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FUGRO WEST, INC.

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August 5, 2004
Project No. 609.004

Alameda County Environmental Protection
Local Oversight Program
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Attention: Mr. Don Hwang, Hazardous Materials Specialist

Subject: February 2004 Work Plan Addendum, Additional Site Study
2250 Telegraph Avenue, Oakland, California

Dear Mr. Hwang:

On behalf of the Buttner Properties, Fugro West, Inc. (Fugro) presents this Addendum to the Work Plan for Additional Site Study dated February 2004. The purpose of this Addendum is to (1) acknowledge receipt of the Technical Comments provided by the Alameda County Environmental Protection Local Oversight Program (LOP) in a letter dated June 9, 2004 and (2) revise the Work Plan by addressing each of the LOP Technical Comments.

Technical Comments Raised in June 9, 2004 LOP Letter

Comment 1 – Site Characterization

... most of the sampling locations proposed appear to be suitable for groundwater sampling for site characterization. However, the proposed location near G12 maybe unnecessary since another location further downgradient is also proposed. Also, the proposed location north of the waste oil tank excavation may be moved southeast 20 feet. Include your proposal for collecting groundwater samples to define the lateral and vertical extent of the dissolved contaminant plumes in the Work Plan Addendum requested below.

Response: Groundwater samples will be obtained from geoprobe holes co-located with the proposed soil vapor sampling locations presented in the February 2004 Work Plan, revised as described herein to meet the requirements of defining the lateral extent of the contaminant plumes. No vertical characterization of the contaminant plumes is currently planned.

A few additional geoprobe locations will be installed to facilitate the collection of additional groundwater samples as deemed appropriate to provide characterization of the lateral extent of the contaminant plumes. The geoprobe samples and the collection of groundwater samples from the existing wells should be sufficient to characterize the contaminant plumes. The new probe locations are as shown on the attached revised Plate 5.

Groundwater samples will be obtained from the existing monitoring wells following well rehabilitation activities. Rehabilitation of the wells will include locating each well, re-securing the wellheads and locking caps, and redeveloping the wells until measurements of pH, temperature and conductivity parameters are stabilized. Once water levels have recovered to within approximately 80 percent of their original level, the wells will be sampled with new disposable bailers. Purge water will be contained in DOT approved 55-gallon drums, stored onsite for later disposal pending the results of the analytical testing program.

Groundwater samples from the geoprobe holes will be obtained from pre-cleaned 1-inch diameter machine slotted well screens placed into the holes. Depending of field conditions, Fugro will attempt to remove one casing volume prior to sample collection Water samples will be obtained using new disposable bailers. Following sample collection, the casings will be removed and the borings will be backfilled with cement grout and patched to match existing conditions.

Comment 2 – Source Characterization

We feel that soil sampling ought to be used for defining the source area prior to [soil vapor] sampling. Nevertheless, the locations proposed adjacent to the waste oil tank excavation can be used for this purpose. However, more sampling locations are required by the waste oil tank excavation as well as in the area of the dispenser islands. Include your proposal for soil sampling to define the lateral and vertical extent of soil contamination sampling in the in the Work Plan Addendum requested below.

Response: The February 2004 Work Plan includes collection and analysis of one soil sample from the vadose zone from geoprobe holes co-located with the proposed soil vapor sampling locations and are presented in the attached revised Plate 5, as described in the response to Comment 1. In addition, soil samples will also be obtained from the dispenser island locations to complete the characterization of these two previous source areas. Up to two soil samples will be obtained from the dispenser area geoprobes. The proposed sample locations in the dispenser areas are shown on the revised Plate 5.

Nine soil samples have already been collected from two different sidewall depths as well as from the bottom of the waste oil tank excavation. These previous samples already provide a preliminary characterization of the lateral and vertical extent of soil contamination in the vicinity of the waste oil tank. During geoprobe installation, soil samples from the geoprobe holes will be observed and frequently screened for the presence of organic vapors. In the event that potentially petroleum hydrocarbon impacted soils above the groundwater surface are detected representative soil samples will be obtained to document contaminant concentrations.

Comment 3 – Preliminary Risk Evaluation

..."Drinking water beneficial use" and Merritt Sand Defaults" ought to have been used.

Response: The same Fugro staff has been onsite throughout this project. Based on our their geotechnical observation of the vadose zone soil type encountered during tank removal, and the soil type encountered during drilling of the 6 temporary wells and 6 existing monitoring wells, it is our opinion that the soil type is more representative of the City of Oakland Sandy Silt default

than the Merritt Sand default. However, acknowledging the need to justify this position, Section 10.3 of the February 2004 Work Plan indicates that 6 soil samples from the vadose zone will be obtained and analyzed for various soil properties, and Section 10.4 of the Work Plan further indicates that the soil property data will be evaluated to characterize the vadose soil type in accordance with both the RWQCB ESL and City of Oakland URL default definitions.

With respect to the use of the "non-drinking water beneficial use" versus "drinking water beneficial use" defaults in the Preliminary Risk Evaluation, we will collect 4 groundwater samples that will be analyzed for Total Dissolved Solids (TDS). If the TDS values are greater than 3,000 mg/kg we will petition the LOP and RWQCB to consider the shallow groundwater under the site as non-potable.

Comment 4 – Soil and Groundwater Analysis

Include the lead scavengers, Ethylene Dibromide (EDB) and Ethylene Dichoride (EDC) for soil and groundwater analyses. Groundwater Analyses – We request that you include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE) and Tertiary Butyl Alcohol (TBA) and Ethanol by EPA Method 8260 for analyses of grab and monitoring well groundwater samples. If any of the latter compounds are detected, and are determined to be of concern... it is to be incorporated into your regular monitoring plan.

Response: The requested analyses will be incorporated into the testing program for the proposed study and subsequent monitoring program.

Comment 5 – Historical Hydraulic Gradients

Please show using a rose diagram with magnitude and direction; include cumulative groundwater gradients in all future reports submitted for this site.

Response: These requests regarding presentation of the groundwater gradient information will be included in all future site reports.

Comment 6 – Groundwater Monitoring Frequency

Please initiate quarterly monitoring for a year.

Response: Groundwater monitoring will be conducted on a quarterly basis for one year commencing with the site study outlined in the February 2004 Work Plan, as modified through this Addendum, once approval is received from the LOP.

We believe the noted response to comments address the concerns of the LOP. Field activities will be scheduled once LOP approval is received. Once approved, this Addendum will become part of the Work Plan for the Additional Site Study for the 2250 Telegraph Avenue site.

If you should have any questions or comments, please feel free to contact the undersigned at (510) 267-4401.

Sincerely,

FUGRO WEST, INC.

Jeriann Alexander, P.E., R.E.A.
Associate Engineer

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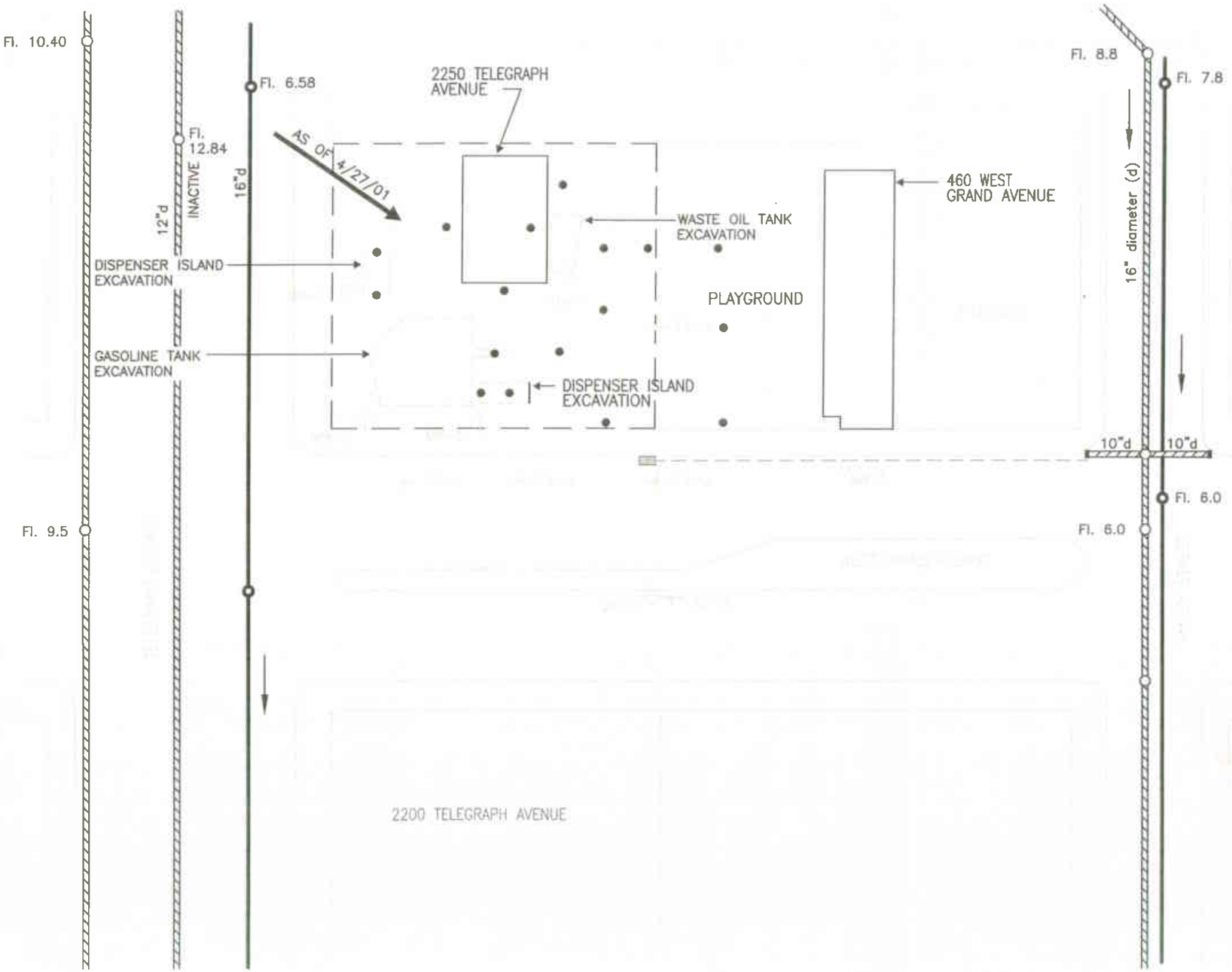
STATE OF CALIFORNIA

JNA/rp

Attachments: Revised Plate 5

Distribution: (1) Addressee
(2) Ms. Marianne Robison, Buttner Properties

July 2004
Project No. 609.004



EXPLANATION

- PROPOSED SAMPLING LOCATIONS, 2004
- STRUCTURE
- LIMITS OF EXCAVATION
- MONITORING WELL LOCATION
- SHALLOW CURB DRAIN
- PREVIOUS TEMPORARY WELL LOCATION
- APPROXIMATE GROUNDWATER FLOW DIRECTION
- STORM DRAIN
- SHALLOW CURB PIPE
- SANITARY SEWER
- Fl. 10.40 PIPELINE FLOW LINE DEPTH REFERENCE TO CITY OF OAKLAND DATUM NGVD ELEVATIONS +3FT MEAN SEA LEVEL

NORTH

0 40 80

FEET

PROPOSED SAMPLING LOCATIONS 2004
2250 Telegraph Avenue
Oakland, California

Revised 7/2004
PLATE 5

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