RO-2511

January 14, 2005
Report 0278.R5
RGA Job # PRD11396

Mr. Robert Miller
Pacific Rolling Door Company
P.O. Box 647
Diablo, CA 94528

RGA
ENVIRONMENTAL INC.

SUBJECT: SUBSURFACE INVESTIGATION REPORT (B54 to B59)
Pacific Rolling Door Company
15900 Worthley Drive
San Lorenzo, CA

Dear Mr. Miller:

RGA Environmental, Inc. (RGA) is pleased to present this report documenting the drilling of six soil borings designated as B54 through B59 to further investigate the extent of zinc impact to soil in the yard to the east of the building at the subject site. Each of the six soil borings were excavated on January 6, 2005 to a total depth of 2.0 feet below the ground surface. Soil samples were collected from the intervals of 0.5 to 1.0 feet and 2.0 to 2.5 feet below the ground surface and analyzed for total zinc. A Site Plan Detail showing the soil boring locations and total zinc results for the soil samples collected on January 6, 2005 is attached as Figure 1. A Site Plan Detail showing all total zinc results in the yard at the 0.5-foot depth for investigations performed in 1995, 2002 and 2005 is attached as Figure 2.

BACKGROUND

A detailed discussion of historical site investigations is provided in RGA's Soil Management Report (document 0278.R4) dated June 18, 2004.

FIELD ACTIVITIES

On January 6, 2005 soil samples from the intervals of 0.5 to 1.0 feet and 2.0 to 2.5 feet below the ground surface were collected into brass tubes and analyzed for total zinc in accordance with procedures set forth for previous borehole B40 through B53 in RGA's Subsurface Investigation Report – B40 to B53 (document 0278.R3) dated October 7, 2003. A Site Plan Detail showing the soil sample collection locations and total zinc results for soil samples collected at the depths of 0.5 and 2.0 feet on January 6, 2005 is attached as Figure 1.

GEOLOGY AND HYDROGEOLOGY

A detailed discussion of the site geology and hydrogeology is provided in RGA's Subsurface Investigation Report – B40 to B53 (document 0278.R3) dated October 7, 2003. The subsurface materials encountered in the boreholes consisted of gray silty gravel to a depth of 12 to 20 inches

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1466 66th Street ● Emeryville, CA 94608 ● 510-547-7771 ● Fax 510-547-1983

below the ground surface. The gray silty layer was underlain by brown silty clay with minor amounts of small gravel to the total depth explored of 2.5 feet below the ground surface. No groundwater was encountered in any of the boreholes.

LABORATORY ANALYSIS

All of the soil samples were analyzed at McCampbell Analytical, Inc. in Pacheco, California for Total Threshold Limit Concentration (TTLC) values of zinc using EPA Method 3050B in conjunction with EPA Method 6010C. McCampbell Analytical, Inc. is a state-accredited hazardous waste testing laboratory.

Total zinc concentrations in all of the samples collected at the 0.5-foot depth from boreholes B54 to B59 ranged from 84 to 290 mg/kg, with the exception of the samples from boreholes B54 and B55, where total zinc concentrations of 600 and 1100 mg/kg were detected, respectively. Total zinc concentrations in all of the samples collected at the 2.0-foot depth from boreholes B54 to B59 were 110 mg/kg, with the exception of the sample from borehole B54, where a total zinc concentration of 130 mg/kg was detected. Review of the laboratory surrogate spike recovery data and discussions with the laboratory analyst for the samples indicates that the sample results for the samples collected at the 2.0-foot depth are not erroneous. The zinc sample results for soil samples collected at the subject site on January 6, 2005 are summarized in Table 1. Zinc concentrations for soil samples collected at the subject site prior to January 6, 2005 are summarized in the attached Table 2.

DISCUSSION AND RECOMMENDATIONS

Zinc concentrations detected in soil samples at the subject site are summarized in Tables 1 and 2 of this report, and are documented in this report as well as the following reports prepared by RGA:

- Preliminary Subsurface Investigation dated May 1, 1995,
- Subsurface Investigation Report (0278.R1) dated August 19, 2002,
- Subsurface Investigation Report (0278.R2) dated May 16, 2003.

Site Plan Details showing soil boring locations and total zinc results for soil samples collected in the yard to the east of the building at the subject site on January 6, 2005 (Figure 1) and during investigations in 1995, 2002 and January 6, 2005 (Figure 2) are attached with this report. The locations of boreholes B15 through B23 inside the building (the boreholes were drilled on April 8, 2003 and are documented in RGA's Subsurface Investigation Report (document 0278.R2) dated May 16, 2003) are not shown on Figure 2 of this report.

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In May, 2004 MARCOR Remediation, Inc., of San Leandro, California excavated and disposed of approximately 235 cubic yards of lead-impacted soil from the yard to the east of the building at the subject site. Soil excavation and disposal and excavation confirmation sample results are documented in RGA's Soil Management Report (document 0278.R4) dated June 29, 2004. The locations of the areas of excavation are shown on Figure 2, attached. In addition, Table 2 identifies if excavation was performed at the different sample collection locations, and also identifies the sample collection locations that were beneath the building at the site.

Review of Figure 2 and Table 2 shows that following excavation in 2004, the only samples in the yard to the east of the building with zinc concentrations at or above the San Francisco Bay Regional Water Quality Control Board (RWQCB-SF) Environmental Screening Level (ESL) for commercial/industrial land use of 600 mg/kg are at the 0.5-foot depth in TB1, TB3, B54 and B55 with total zinc concentrations of 2,000, 960, 600 and 1,100, respectively. A total zinc isoconcentration contour for 600 mg/kg is shown on Figure 2.

Based on the absence of elevated concentrations of zinc in the six samples collected at the 2.0-foot depth, zinc does not appear to be migrating vertically and appears to be confined to portions of the silty gravel layer that is approximately 12 to 20 inches thick in the vicinity of the former paint racks.

Assessment of the risk posed by the zinc concentrations remaining at the site can be expedited by comparison to the threshold zinc concentrations that follow. Each threshold concentration is for shallow soil at industrial/commercial sites:

USEPA Region IX Preliminary Remediation Goal	100,000 mg/kg
RWQCB-SF Human Health Screening Level	61,000 mg/kg
RWQCB-SF Ceiling Value	2,500 mg/kg
RWQCB-SF Urban Area Ecotoxicity Criteria	600 mg/kg (same as residential threshold)

The ecotoxicity threshold for zinc of 600 mg/kg is not an appropriate remediation goal at this site. As explained in Appendix 6 of the RWQCB-SF July 2003 Update to Environmental Screening Levels, ecotoxicity concerns are lower for on-site ecological receptors at an industrial site than at a residential site. Both the current and projected land use for the subject site is industrial. Additionally, the likelihood that off-site ecological receptors will be exposed to zinc from the subject site is low. The first reason that the likelihood of off-site exposure is low is that no direct runoff is expected from the area of the site with elevated zinc concentrations in soil. The second reason is that leaching of zinc into groundwater is not expected, because elevated zinc concentrations have not migrated to the 2.0-foot depth and appear to be confined to the 12 to 20-inch thick silty gravel surface layer (see Table 1).

All detected zinc concentrations in soil remaining at the subject site are below the USEPA Region IX Preliminary Remediation Goal of 100,000 mg/kg, the RWQCB-SF Human Health Screening Level of 61,000 mg/kg, and the RWQCB-SF Ceiling Value of 2,500 mg/kg. RGA recommends that no further remediation be performed at the subject site, and that case closure be granted in accordance with recommendations set forth in RGA's Soil Management Report (0278.R4) dated June 18, 2004.

LIMITATIONS

This report was prepared solely for the use of Pacific Rolling Door Company. The content and conclusions provided by RGA in this assessment are based on information collected during our investigation, which may include, but not be limited to, visual site inspections; interviews with site owner, regulatory agencies and other pertinent individuals; review of available public documents; subsurface exploration and our professional judgement based on said information at the time of preparation of this document. Any subsurface sample results and observations presented herein are considered to be representative of the area of investigation; however, geological conditions may vary between borings and may not necessarily apply to the general site as a whole. If future subsurface or other conditions are revealed which vary from these findings, the newly revealed conditions must be evaluated and may invalidate the findings of this report.

This report is issued with the understanding that it is the responsibility of the owner, or his representative, to ensure that the information contained herein is brought to the attention of the appropriate regulatory agencies, where required by law. Additionally, it is the sole responsibility of the owner to properly dispose of any hazardous materials or hazardous wastes left onsite, in accordance with existing laws and regulations.

This report has been prepared in accordance with generally accepted practices using standards of care and diligence normally practiced by recognized consulting firms performing services of a similar nature. RGA is not responsible for the accuracy or completeness of information provided by other individuals or entities which is used in this report. This report presents our professional judgement based upon data and findings identified in this report and interpretation of such data based upon our experience and background, and no warranty, either express or implied, is made. The conclusions presented are based upon the current regulatory climate and may require revision if future regulatory changes occur.

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Should you have any questions, please do not hesitate to contact us at (510) 547-7771.

Sincerely,

Dan Fairer for

Karin Schroeter
Project Manager

Paul H. King

Paul H. King
California Registered Geologist #5901
Expires: 12/31/05

Attachments: Table 1: Analytical Results Summary, Samples Collected Prior to January 6, 2005
Table 2: Analytical Results Summary, Samples Collected January 6, 2005
Figure 1: Site Plan Detail - Soil Sample Zinc Results, January 6, 2005
Figure 2: Site Plan Detail – 1995, 2002 and 2005 Zinc Results
Laboratory Reports
Chain of Custody Documentation

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0278.R5

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TABLE 1
SUMMARY OF LABORATORY ANALYTICAL RESULTS
TOTAL ZINC - SOIL SAMPLES
(Samples Collected January 6, 2005)

Sample No.	Total Zinc (mg/kg)
B54-0.5	600
B55-0.5	1100
B56-0.5	130
B57-0.5	140
B58-0.5	290
B59-0.5	84
B54-2.0	130
B55-2.0	110
B56-2.0	110
B57-2.0	110
B58-2.0	110
B59-2.0	110

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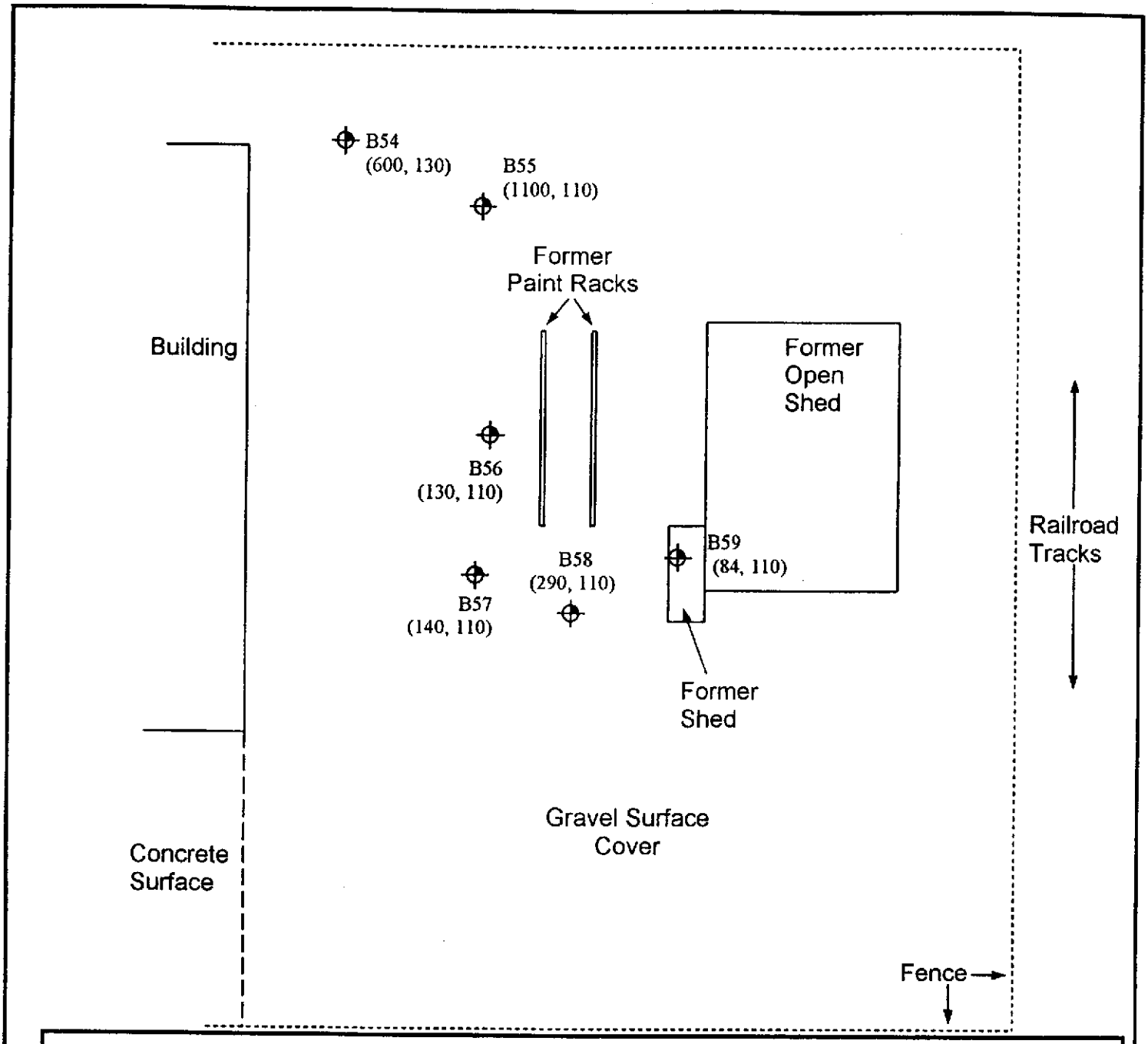
TABLE 2
SUMMARY OF LABORATORY ANALYTICAL RESULTS
TOTAL ZINC - SOIL SAMPLES
(Samples Collected Prior to January 6, 2005)

Sample No.	Total Zinc (mg/kg)	Date Collected	Excavated Area? (Y/N)
TB1	2000	04/19/95	N
TB2	5100	04/19/95	Y
TB3	960	04/19/95	N
TB4	280	04/19/95	N
TB5	340	04/19/95	N
B6-0.5	110	07/18/02	N
B7-0.5	190	07/18/02	N
B8-0.5	29	07/18/02	N
B9-0.5	310	07/18/02	N
B10-0.5	350	07/18/02	N
B11-0.5	420	07/18/02	Y
B12-0.5	55	07/18/02	Y
B13-0.5	1400	07/18/02	Y
B14-0.5	140	07/18/02	N
B15-0.5	110	04/08/03	N*
B16-0.5	20	04/08/03	N*
B17-0.5	55	04/08/03	N*
B18-0.5	44	04/08/03	N*
B19-0.5	41	04/08/03	N*
B20-0.5	57	04/08/03	N*
B21-0.5	42	04/08/03	N*
B22-0.5	63	04/08/03	N*
B23-0.5	940	04/08/03	N*

Notes:
* Borehole locations B15 to B23 drilled 04/08/03 were underneath the building at the subject site.



LEGEND

Soil Boring Location - 1/6/05 Investigation

(1100, 110) Total Zinc Concentration, mg/kg (at 0.5, then 2.0 ft.)

FIGURE 1
Site Plan Detail - Soil Sample Zinc Results, January 6, 2005
Pacific Rolling Door
15900 Worthley Drive
San Lorenzo, California

N

Base Map From:
RGA Environmental
July, 2002

RGA Environmental, Inc.
4701 Doyle Street
Suite 14
Emeryville, CA 94608

0 15 30
SCALE IN FEET

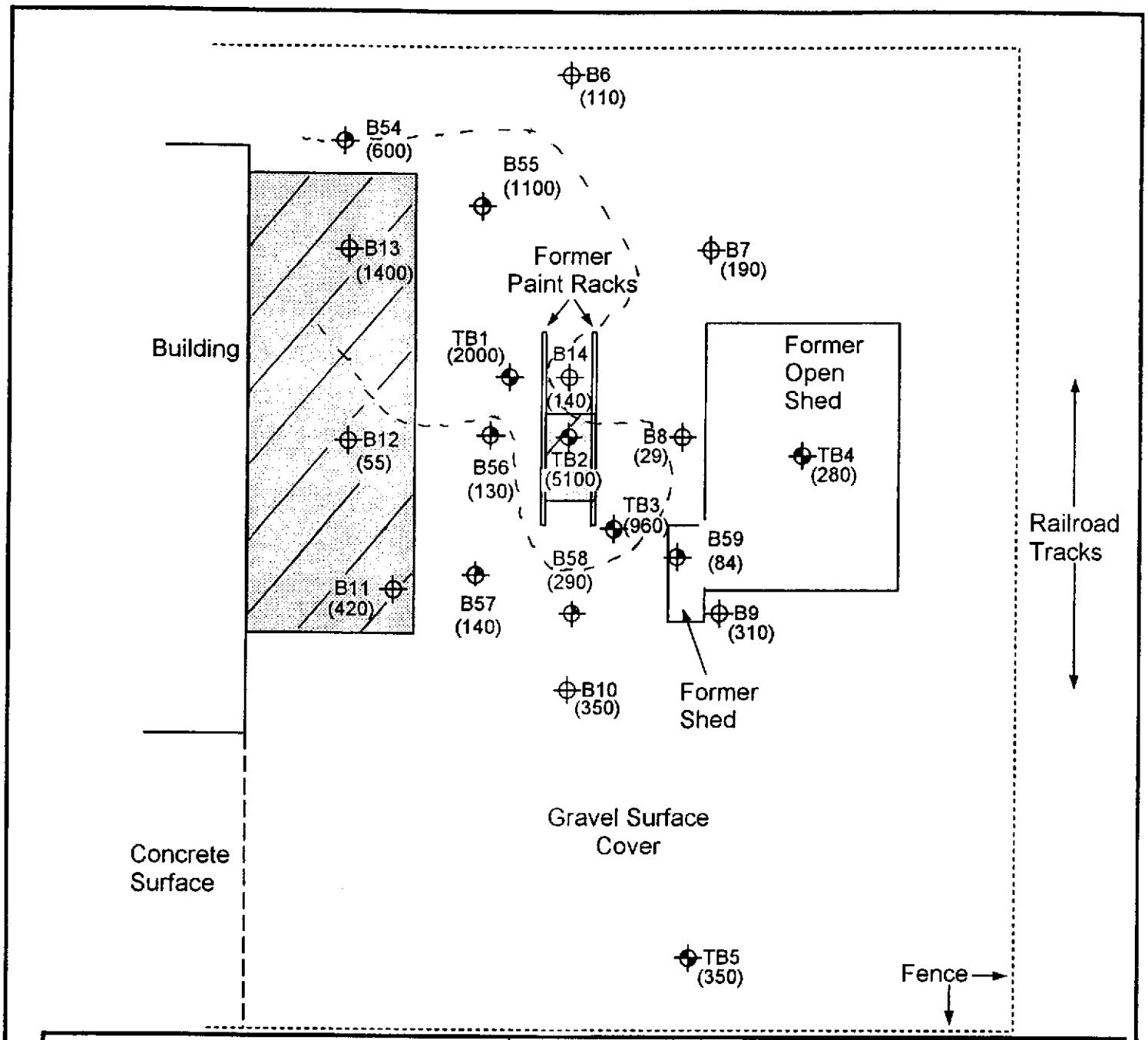


FIGURE 2
Site Plan Detail - Current and Historical Zinc Results
Pacific Rolling Door
15900 Worthley Drive
San Lorenzo, California

N

Base Map From:
RGA Environmental
July, 2002

RGA Environmental, Inc.
4701 Doyle Street
Suite 14
Emeryville, CA 94608

0 15 30
SCALE IN FEET

McCampbell Analytical, Inc.

110 2nd Avenue South, #D7, Pacheco, CA 94553-5560
Telephone : 925-798-1620 Fax : 925-798-1622
Website: www.mccampbell.com E-mail: main@mccampbell.com

RGA Environmental 1466 66th Street Emeryville, CA 94608	Client Project ID: #0278; Pacific Rolling Door	Date Sampled: 01/06/05
		Date Received: 01/06/05
	Client Contact: Eric Olson	Date Extracted: 01/06/05
	Client P.O.:	Date Analyzed: 01/07/05

Metals*

Extraction method: SW3050B Analytical methods: 6010C Work Order: 0501043

Lab ID	Client ID	Matrix	Extraction	Zinc	DF	% SS
0501043-001A	B54-0.5	S	TTLC	600	1	110
0501043-002A	B55-0.5	S	TTLC	1100	1	111
0501043-003A	B56-0.5	S	TTLC	130	1	105
0501043-004A	B57-0.5	S	TTLC	140	1	112
0501043-005A	B58-0.5	S	TTLC	290	1	111
0501043-006A	B59-0.5	S	TTLC	84	1	103
0501043-007A	B54-2.0	S	TTLC	130	1	113
0501043-008A	B55-2.0	S	TTLC	110	1	109
0501043-009A	B56-2.0	S	TTLC	110	1	113
0501043-010A	B57-2.0	S	TTLC	110	1	110
0501043-011A	B58-2.0	S	TTLC	110	1	112
0501043-012A	B59-2.0	S	TTLC	110	1	120

Reporting Limit for DF =1; ND means not detected at or above the reporting limit	W	TTLC	NA	mg/L
	S	TTLC	5.0	mg/Kg

*water/product/oil/non-aqueous liquid samples and all TCLP / STLC / DISTLC / SPLP extracts are reported in mg/L, soil/sludge/solid samples in mg/kg, wipe samples in µg/wipe, filter samples in µg/filter.

means surrogate recovery outside of acceptance range due to matrix interference; & means surrogate diluted out of acceptance range; ND means not detected above the reporting limit; N/A means not applicable to this sample or instrument.

Analytical Methods: EPA 6010C/200.7 for all elements except: 200.9 (water/liquid- Sb, As, Pb, Se, Tl); 245.1 (Hg); 7010 (sludge/soil/solid/oil/product/wipe/filter - As, Se, Tl); 7471B (Hg).

i) liquid sample that contains greater than ~1 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations; j) reporting limit raised due to insufficient sample amount; k) results are reported by dry weight; y) estimated values due to low surrogate recovery; z) reporting limit raised due to matrix interference.

DHS Certification No. 1644

Angela Rydelius, Lab Manager

McCampbell Analytical, Inc.
110 Second Avenue South, #D7
Pacheco, CA 94553-5560
(925) 798-1620

CHAIN-OF-CUSTODY RECORD

WorkOrder: 0501043 **ClientID: RGAE**

Report to:
Eric Olson
RGA Environmental
1466 66th Street
Emeryville, CA 94608
TEL: (510) 547-7771
FAX: (510) 547-1983
ProjectNo: #0278; Pacific Rolling Door
PO:

Bill to:
Accounts Payable
RGA Environmental
1466 66th Street
Emeryville, CA 94608

Requested TAT: 1 day
Date Received: 01/06/2005
Date Printed: 01/06/2005

Sample ID	ClientSampID	Matrix	Collection Date	Hold	Requested Tests (See legend below)														
					1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
0501043-001	B54-0.5	Soil	1/6/05	☐	A														
0501043-002	B55-0.5	Soil	1/6/05	☐	A														
0501043-003	B56-0.5	Soil	1/6/05	☐	A														
0501043-004	B57-0.5	Soil	1/6/05	☐	A														
0501043-005	B58-0.5	Soil	1/6/05	☐	A														
0501043-006	B59-0.5	Soil	1/6/05	☐	A														
0501043-007	B54-2.0	Soil	1/6/05	☐	A														
0501043-008	B55-2.0	Soil	1/6/05	☐	A														
0501043-009	B56-2.0	Soil	1/6/05	☐	A														
0501043-010	B57-2.0	Soil	1/6/05	☐	A														
0501043-011	B58-2.0	Soil	1/6/05	☐	A														
0501043-012	B59-2.0	Soil	1/6/05	☐	A														

Test Legend:

1	METALS_S	2		3		4		5	
6		7		8		9		10	
11		12		13		14		15	

Prepared by: Melissa Valles

Comments:

NOTE: Samples are discarded 60 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at client expense.

pdf

1466 66th Street
Emeryville, CA 94608
510-547-7771
510-547-1983 fax
www.rgaenv.com

RUSH

0501043

CHAIN OF CUSTODY RECORD

PAGE 1 OF 1

PROJECT NUMBER:	PROJECT NAME:
0278	Pacific Rolling Door

SAMPLED BY: (PRINTED AND SIGNATURE) Paul H. King Paul H. King

SAMPLE NUMBER	DATE	TIME	TYPE	SAMPLE LOCATION	NUMBER OF CONTAINERS	ANALYSIS(ES): Total Zinc	PRESERVATIVE	REMARKS
B54-0.5	1/6/05		Soil		1	X	ICE	24 Hour RUSH
B55-0.5	"		"		1	X	"	"
B56-0.5	"		"		1	X	"	"
B57-0.5	"		"		1	X	"	"
B58-0.5	"		"		1	X	"	"
B59-0.5	"		"		1	X	"	"
B54-2.0	"		"		1	X	"	"
B55-2.0	"		"		1	X	"	"
B56-2.0	"		"		1	X	"	"
B57-2.0	"		"		1	X	"	"
B58-2.0	"		"		1	X	"	"
B59-2.0	"		"		1	X	"	"

RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)
Paul H. King	1-6-05	1630	
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)
	1-6-05	1710	
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED FOR LABORATORY BY: (SIGNATURE)

REMARKS:

ICE ✓
GOOD CONDITION ✓
HEAD SPACE ABSENT
DECHLORINATED IN LAB
PRESERVATION VOAS | O&G | METALS | OTHER

APPROPRIATE CONTAINERS ✓
PRESERVED IN LAB

TOTAL NO. OF SAMPLES (THIS SHIPMENT)	12
TOTAL NO. OF CONTAINERS (THIS SHIPMENT)	12

LABORATORY: McCampbell Analytical

LABORATORY CONTACT: Angela Rydelius

LABORATORY PHONE NUMBER: (925)798-1620

SAMPLE ANALYSIS REQUEST SHEET ATTACHED: ( )YES (X)NO