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Alameda County
MAY 04 2004
Environmental Health

April 28, 2004

Mr. Barney Chan
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

SUBJECT: APRIL 22, 2004 REQUEST FOR ADDITIONAL SAMPLING
1455 5th Street
Oakland, California

Dear Mr. Chan:

On behalf of our clients, please accept this letter as a response to your April 22, 2004 letter requesting groundwater samples at the above-referenced site.

As you are aware, shallow soil containing elevated concentrations of lead and mercury were excavated and removed from the site. Bottom of excavation samples indicated that all of the elevated lead concentrations were removed from the site. No groundwater was encountered in any of the excavations, and it is likely that groundwater was several feet below the bottom of the excavation.

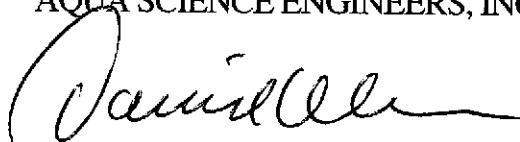
ASE believes there is no need for the sampling of soluble metals in groundwater. There is no evidence of deeper lead and mercury concentrations in soil that may have impacted groundwater. Metals, as you are aware, do not travel readily in soil, especially in low permeability silt and clay such as found in west Oakland. Groundwater is not used in the site vicinity for drinking water, and it is highly unlikely that groundwater will ever be used for drinking water in the site vicinity, especially considering the site's proximity to the bay, the low permeability of soils in this site vicinity, and the large concentration of contaminated sites in the site vicinity. In addition, given the low permeability of soils in the site vicinity and the low mobility of metals in the environment, it would be very unlikely that there could be any off-site impacts to potential drinking water. Since metals are non-volatile, the presence of metals in groundwater, should they exist, would not be detrimental to human health in areas where groundwater is not used for drinking water.

Based on these considerations, ASE feels that it should not be necessary to analyze groundwater at the site for soluble metals. ASE has conducted several other similar remediation projects in the site vicinity and this has never been a requirement. ASE's concern, besides being an unnecessary cost, is that metals occur naturally in the environment and ASE has no information on background metal concentrations in groundwater in the site vicinity. ASE also has a concern that there may be other potential sources in the site vicinity and given the small size of the property it may be necessary to drill off-site in public right of ways to obtain background data, all of which could become expensive should elevated concentrations be found.

ASE requests that you reconsider the need for this sampling. Should you have any questions or if you would like to discuss this issue further, please feel free to call us at (925) 820-9391.

Respectfully submitted,

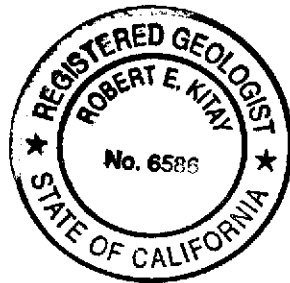
AQUA SCIENCE ENGINEERS, INC.



David Allen
Senior Project Manager



Robert E. Kitay, RG, REA
Senior Geologist



cc: Mr. Andy and Ms. Jean Hall