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10:12 am, Jul 28, 2011

Alameda County
Environmental Health

July 20, 2011

Ms. Donna Drogos
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Dear Ms. Drogos:

**Subject: Perjury Statement:
Appeal of ACEH Directive**

**Reference: Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606**

PSC Industrial Outsourcing LP, has submitted this Appeal on behalf of Earthgrains Baking Companies, Inc.

I declare to the best of my knowledge at the present time, that the information and/or recommendations contained in the attached document are true and correct.

Respectfully,

PSC INDUSTRIAL OUTSOURCING, LP

Handwritten signature of John R. Carrow in blue ink.

John R. Carrow, P.G.
Senior Geologist

Handwritten signature of Matthew Gabris in blue ink.

Earthgrains – Authorized Agent
Matthew Gabris

Handwritten signature of the Director in blue ink.

Director – Safety, Environment, & Claims



July 20, 2011

Ms. Donna Drogos
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Dear Ms. Drogos:

Subject: Appeal of ACEH Directive

**Reference: Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606
RO #0002569**

On behalf of Earthgrains Baking Companies, Inc. (Earthgrains), PSC Industrial Outsourcing, LP is submitting an appeal to Alameda County Environmental Health (ACEH) and San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) regarding their directive from the *Corrective Action Completion Report, dated April 19, 2011*. In accordance with SFBRWQCB procedures, PSC has completed the complaint record for this appeal process and included it as Attachment A.

ACEH June 2, 2011 response to Earthgrains generally agreed with PSC's conclusion in the above-mentioned report that active remediation at the site was complete; however, post remediation monitoring was required. ACEH went on to specify that the post closure monitoring be conducted in monitoring wells installed in the shallow permeable zone encountered in the source area removal excavation. This would require new wells installed in the source area and down gradient. The source area was backfilled with roller compacted aggregate base course, grade 8 limestone gravel, a geo-synthetic liner and resurfaced with 12-18 inches of concrete reinforced with 5/8-inch rebar set on 12-inch centers. The ACEH comment letter is also included as Attachment B.

PSC accepts the directive that post closure monitoring should be conducted. However, PSC disagrees that installation of additional wells are required. PSC and their subcontractors, on behalf of Earthgrains, have drilled over 55 soil borings, collected 275 soil samples, collected 52 grab groundwater samples and installed 10 groundwater monitoring wells with numerous groundwater-sampling events conducted. The permeable zone encountered in the excavation at approximately 10 feet below ground surface (bgs) was not found to be laterally continuous across the site. Boring logs of the two existing down-gradient wells, MW-101, and MW-102 encountered clay with estimated 10 to 25% sand from the surface to a depth of 18 feet bgs. This interval was logged as moist but was not considered the first occurrence of groundwater by our field geologist. The boring logs for MW-101, MW-102, MW-103, and MW-104 as well as

geological cross sections presented in previous reports by PSC and their subcontractor are included as Attachment C.

PSC observed a permeable layer along the northeast wall of the open excavation at approximately 10 feet bgs. The material encountered on the southern end of the excavation consisted of gravel and clay fill. The excavation filled with water to the approximate 10-foot bgs depth when de-watering pumps were shut down. This water did exhibit a sheen of free phase product; however, the excavated fill material encountered in the source area contained significant concentrations of diesel fuel. Disturbance of this material obviously increased the amount of free phase product on groundwater in the excavation.

As stated in PSC's previous Closure Request and the Corrective Action Completion Report, PSC believes the site should be granted "No Further Action".

- The surface of the Site is covered by either buildings, asphalt or concrete pavement.
- The Site is and will likely remain a commercial/industrial property for the near future.
- Groundwater is not suitable for a drinking water resource.
- No significant groundwater impact has been observed above the ESLs except the water encountered in the former diesel USTs gravel filled excavation.
- Direct exposure to TPH-d by industrial workers is not probable due to the depth of contamination and concrete or asphalt cover.
- Direct exposure to TPH-d by construction workers is limited to deep trench work (>10 feet).
- Migration to surface water of TPH-d is not probable based on the silty clay soils and the length of any potential migration pathway.

Groundwater impact in the aquifer does not exceed the commercial industrial ESL for sites where groundwater is not a current or potential drinking water resource. Post-source removal concentrations of TPH-d in groundwater were only slightly lower than pre-source removal samples. These levels are below the Commercial ESL of 210 µg/L. PSC anticipates reductions in the concentrations of TPH-d in groundwater in the future due to contaminant mass removed during the source area removal.

ACEH also required Quarterly Remediation Reports for the fourth quarter 2010 and first quarter 2011 in their review letter. PSC presented reports for the sampling conducted in these quarters in the Corrective Action Completion Report. PSC will prepare Quarterly Remediation Reports for the third quarter 2011 after semi-annual groundwater monitoring results are received. ACEH also requested a Monitoring Well Installation Work Plan. PSC has attempted to contact ACEH numerous times to discuss the request for installation of additional wells. After these attempts to

contact ACEH by telephone and e-mail, PSC recommended that Earthgrains not provide the Monitoring Installation Work Plan and instead file this appeal to ACEH.

It is PSC's opinion that based on the very low risk that the residual diesel fuel in soil and groundwater posed to human health and the environment, additional wells would not be a benefit. Since investigations and corrective actions at this site are reimbursable by the California UST Fund, additional well installations would not be a prudent use of Earthgrains or the State of California funds. PSC formally requests closure for the LUFT incident at the Site. If you have any questions concerning this document, please contact me at (618) 792-2468.

Respectfully,

PSC INDUSTRIAL OUTSOURCING, LP



John R. Carrow, PG
Senior Project Manager

cc: Mary Rose Cassa, PG – San Francisco Bay Regional Water Quality Control Board
Matt Gabris – Earthgrains Baking Companies, Inc.
Gary McKinney – Earthgrains Baking Companies, Inc.
Karen Aldenhuisen – Earthgrains Baking Companies, Inc.

Attachments: A – SFBRWQCB Complaint Record for UST and SCP Cases
B – ACEH June 2, 2011 Directive Letter
C – Boring Logs and Cross Sections

Attachment A

SFBRWQCB Complaint Record for UST and SCP Cases

**San Francisco Bay Regional Water Quality Control Board
Complaint Record for UST and SCP Cases**

Please fill out this form and tell us what you are disputing, who is involved, the affected site or sites, the outcome you are seeking, and the level of communication you have had with the involved agency. We will work to resolve your complaint in a timely manner.

Complaint date: 6/23/11
Submitted by: John R. Carrow, PG
Contact phone: 618-792-2468 **e-mail** jcarrow@pscnow.com
address: 210 West Sand Bank Road; Columbia, IL 62236

Regulatory agency involved: Alameda County Environmental Health
Site name & address: 955 South Kennedy Street; Oakland, CA 94606
Local agency case #: RO0002569 **Type of site:** UST **SCP/Non-Fuel**

Summary of Dispute: PSC, on behalf of Sara Lee Bakery Group, disputes the ACEH, June 2, 2011 comment letter regarding the Corrective Action Completion Report, dated April 19, 2011. ACEH requested post remediation groundwater monitoring from the shallow groundwater interval encountered in the excavation. The ACEH requirement for post closure monitoring also included installation of new wells in the source area and down gradient. PSC and Sara Lee do not dispute the requirement for post remediation groundwater monitoring, however it is our opinion that installation of new wells is not warranted and is not a prudent use of Sara Lee and the State UST (over)
List staff you have contacted about the dispute, as appropriate, for local agency:

Caseworker: <u>Mr. Paresh Katri</u>	Date: <u>June 2011</u>
Program Manager: <u>Ms. Donna Drogos</u>	Date: <u>June 2011</u>
Chief: _____	Date: _____
Director: _____	Date: _____

Date issue(s) first raised with local agency: June 13, 2011
Number of times you tried to resolve the issue(s) with local agency: _____

Desired outcome of the dispute: Limited post closure groundwater monitoring, No Further Action.

Other agencies contacted? Yes No (If yes, please explain)

Additional comments: State Water Resources Control Board - Mr. Chuck Headlee

Internal Water Board Use Only: Complaint received by staff: _____ Date: _____
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Summary of Dispute (Continued):

funds. PSC has provided more detailed rationale for this opinion with figures and tables to support the rationale in the attached letter.

Attachment B

ACEH June 2, 2011 Directive Letter



ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

June 2, 2011

Mr. Melvin Siegel (*Sent via E-mail to: melvin.siegel@saralee.com*)
Environmental Manager
Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, CA 94606

Subject: Corrective Action Plan For Fuel Leak Case No. R00002569 and GeoTracker Global ID T0600177342, Earthgrains Baking Company, Inc., 955 Kennedy Street, Oakland, California, 94606

Dear Mr. Siegel:

Thank you for the recently submitted document entitled, "Corrective Action Completion Report," dated April 19, 2011, which was prepared by PSC Industrial Outsourcing, LP (PSC) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report for the above-referenced site. PSC has completed an over-excavation and based on soil and groundwater sampling, has recommended no further action for the site. ACEH generally concurs with PSC that active remediation is completed, however, in order to evaluate remedial effectiveness, post remediation monitoring must be conducted.

We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Post Remediation Monitoring** – As mentioned above, in order to evaluate remediation effectiveness, post remediation groundwater monitoring is necessary. Since the zone of contamination that was remediated was shallow, groundwater monitoring wells must be installed with screened intervals that intersect this shallow zone only, and do not exhibit submerged screens. Monitoring well should be installed in locations within the source area(s) and down-gradient to adequately monitor the contaminant plume. Please note that demonstrating plume stability, as well as demonstrating that concentrations of contaminants will ultimately achieve cleanup goals, are some of the criteria necessary to achieve case closure consideration.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **July 23, 2011** – Monitoring Installation Work Plan
- **Due within 30 Days of Sampling** – Quarterly Remediation Report (4th Quarter 2010)
- **Due within 30 Days of Sampling** – Quarterly Remediation Report (1st Quarter 2011)
- **Due within 30 Days of Sampling** – Quarterly Remediation Report (2nd Quarter 2011)
- **Due within 30 Days of Sampling** – Quarterly Remediation Report (3rd Quarter 2011)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,



Digitally signed by Paresh C. Khatri
DN: cn=Paresh C. Khatri, o=Alameda
County Environmental Health
Department, ou,
email=paresh.khatri@acgov.org,
c=US
Date: 2011.06.02 10:04:00 -0700'

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: Public Participation Fact Sheet
List of Fact Sheet Recipients
Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: John Carrow, PSC Environmental Services, 210 West Sand Bank Road, Columbia, Illinois,
62236 (Sent via E-mail to: JCarrow@pscnow.com)
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA
94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)
Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Paresh Khatri, ACEH (Sent via E-mail to: paresh.khatri@acgov.org)
GeoTracker
File

Responsible Party(ies) Legal Requirements/Obligations

REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and [other](#) data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
 - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

Attachment C

Boring Logs and Geological Cross Sections



Project: Earthgrains Baking Companies Inc. Boring No.: MW-101 Page(s): 1 of 2

Client: Sara Lee Bakery Group, Inc. Project #: 62402797 / 024530 Date: 1/19/2009

Location: 955 Kennedy St. Oakland, CA Coordinates: LAT 37.7786814 LON -122.2400025 Datum: NAD 83

BORING/WELL CONSTRUCTION LOG

Drilling Company: Gregg Drilling & Testing, Inc. Driller: Jason Weff Logger: Brendon J. Wilder

Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY					Flush Mount Vault
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)	Casing and Screen	Depth (ft)	Annulus	Surface Completion	
0-1							0 to 18	2" PVC Sch. 40	0 to 14	Type II-IV Cement			
1-2							18 to 28	2" PVC 0.01" Slot Sch. 40	14 to 16	3/8" Bentonite Chips			
2-3									16 to 28	#2/12 Sand			
Description													
<small>Modifier and Main Soil, minor soil components, color, consistency/density, moisture, odor, staining</small>													
1													
2													
3													
4													
5		10:30											
6	S.S.		3	4	5	CL	<5						
7													
8													
9		10:35											
10	S.S.		4	6	6	CL	<5						
11													
12													
13													
14		10:40											
15	S.S.		5	5	6	CL	<5						
16													
17													
18		10:50											
19	S.S.		4	4	5	CL	<5						
20													

Notes: Drilled borehole using 8" hollow-stem augers with California Modified Split-Spoon Sampling. Brass sample tubes = 6" in length.

Reviewed By:
John R. Carrow, PG



Project: Earthgrains Baking Companies Inc.	Boring No.: MW-101	Page(s): 2 of 2
Client: Sara Lee Bakery Group, Inc.	Project #: 62402797 / 024530	Date: 1/19/2009
Location: 955 Kennedy St. Oakland, CA	Coordinates: LAT 37.7786814 LON -122.2400025	Datum: NAD 83

BORING/WELL CONSTRUCTION LOG

Drilling Company: Gregg Drilling & Testing, Inc.	Driller: Jason Weff	Logger: Brendon J. Wilder
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Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY					Flush Mount Vault
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)	Casing and Screen	Depth (ft)	Annulus	Surface Completion	
21-						CL		0 to 18	2" PVC Sch. 40	0 to 14	Type II-IV Cement		
22-								18 to 28	2" PVC 0.01" Slot Sch. 40	14 to 16	3/8" Bentonite Chips		
23-										16 to 28	#2/12 Sand		
24-	S.S.	10:55	5	5	5	CL	<5						
25-													
26-													
27-	S.S.	11:00	4	7	10	CL	<5						
28-													
29-													
30-													
31-													
32-													
33-													
34-													
35-													
36-													
37-													
38-													
39-													
40-													

Notes: Drilled borehole using 8" hollow-stem augers with California Modified Split-Spoon Sampling. Brass sample tubes = 6" in length.

Reviewed By:
John R. Carrow, PG



Project: Earthgrains Baking Companies Inc. Boring No.: MW-102 Page(s): 1 of 2

Client: Sara Lee Bakery Group, Inc. Project #: 62402797 / 024530 Date: 1/20/2009

BORING/WELL CONSTRUCTION LOG Location: 955 Kennedy St. Oakland, CA Coordinates: LAT 37.7789004 LON -122.2400355 Datum: NAD 83

Drilling Company: Gregg Drilling & Testing, Inc. Driller: Jason Weff Logger: Brendon J. Wilder

Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY				
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)	Casing and Screen	Depth (ft)	Annulus	Surface Completion
								0 to 18	2" PVC Sch. 40	0 to 14	Type II-IV Cement	
								18 to 28	2" PVC 0.01" Slot Sch. 40	14 to 16	3/8" Bentonite Chips	
										16 to 28	#2/12 Sand	

Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Top 6"	Middle 6"	Bottom 6"	USCS	PID Readings	Description		Flush Mount Vault
								Modifier and Main Soil; minor soil components, color, consistency/density, moisture, odor, staining		
1-2								Top 14" concrete		
2-5								Air knifed/hand augered to 5' below ground surface. Drilled borehole using 8" hollow-stem augers with California Modified Split-Spoon Sampling.		
5-6	S.S.	9:30	4	5	7	CL	<5	Silty CLAY; very dark greyish-brown (2.5 YR 3/2), mottled dark yellowish brown (10 YR 3/4), soft to medium stiff, damp.		
6-9	S.S.	9:35	3	4	5	CL	<5	Coarse-grained angular sand, dark brown (5 YR 3/1), stiff, moist.		
9-14	S.S.	9:40	5	7	7	CL	<5	With less silt %, medium stiff, moist to very moist.		
14-18	S.S.	9:45	3	6	6	CL	<5	Sandy CLAY; dark brown mottled dark grey (5 YR 5/1), stiff, moist, no odor.		

Notes: Brass sample tubes = 6" in length. Sand #2/12 Monterey 50# bags:5.5. Type II-IV cement 94# bags. Bentonite chips 3/8" 50 lbs bags.

Reviewed By:
John R. Carrow, PG



Project: Earthgrains Baking Companies Inc.	Boring No.: MW-102	Page(s): 2 of 2
Client: Sara Lee Bakery Group, Inc.	Project #: 62402797 / 024530	Date: 1/20/2009
Location: 955 Kennedy St. Oakland, CA	Coordinates: LAT 37.7789004 LON -122.2400355	Datum: NAD 83

BORING/WELL CONSTRUCTION LOG

Drilling Company: Gregg Drilling & Testing, Inc.	Driller: Jason Weff	Logger: Brendon J. Wilder
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Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY				
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)	Casing and Screen	Depth (ft)	Annulus	Surface Completion
21-						CL		0 to 18	2" PVC Sch. 40	0 to 14	Type II-IV Cement	
22-								18 to 28	2" PVC 0.01" Slot Sch. 40	14 to 16	3/8" Bentonite Chips	
23-										16 to 28	#2/12 Sand	
24-	S.S.	9:50	3	5	6	CL	<5					
25-												
26-												
27-	S.S.	10:00	9	7	6	SP	<5					
28-								Terminate borehole at 28' bgs @ 10:00				
29-												
30-												
31-												
32-												
33-												
34-												
35-												
36-												
37-												
38-												
39-												
40-												

Notes: Brass sample tubes = 6" in length. Sand #2/12 Monterey 50# bags:5.5. Type II-IV cement 94# bags. Bentonite chips 3/8" 50 lbs bags.

Reviewed By:
John R. Carrow, PG



Project: Earthgrains Baking Companies Inc. Boring No.: MW-103 Page(s): 1 of 2
 Client: Sara Lee Bakery Group, Inc. Project #: 62402797 / 024530 Date: 1/19/2009
 Location: 955 Kennedy St. Oakland, CA Coordinates: LAT 37.7789437 LON -122.2399131 Datum: NAD 83

BORING/WELL CONSTRUCTION LOG

Drilling Company: Gregg Drilling & Testing, Inc. Driller: Jason Weff Logger: Brendon J. Wilder

Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY						
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)	Casing and Screen	Depth (ft)	Annulus	Surface Completion		
0							0	to 10	2" PVC Sch. 40	0	to 6	Type II-IV Cement		
10							10	to 25	2" PVC 0.01" Sch. 40	6	to 8	3/8" Bentonite Chips		
										8	to 25	#2/12 Sand		
Description													Flush Mount Vault	
Modifier and Main Soil; minor soil components, color, consistency/density, moisture, odor, staining														
1									Top 1' concrete					
2									Air knifed/hand augered to 5' below ground surface. Drilled borehole using 8" hollow-stem augers with California Modified Split-Spoon Sampling					
3														
4														
5														
6	S.S.	13:15	4	5	5	CL	<5		Silty CLAY ; trace sand, dark brown (5 YR 2.5/1), mottled grey (7.5 YR 5/1), soft to firm, damp					
7														
8														
9	S.S.	13:20	2	2	3		<5		Sandy, very soft, wet					
10														
11														
12						SM			Silty SAND , dark brown (5 YR 2.5/1), loose, wet, no petroleum odor					
13														
14	S.S.	13:25	2	1	0		<5		NO RECOVERY					
15														
16														
17														
18														
19	S.S.	13:30	5	8	14	CL	<5		Sandy CLAY ; some gravel (sub-angular), dark brown (5 YR 2.5/1), stiff to hard, wet.					
20														

Notes: Brass sample tubes = 6" in length. Sand #2/12 Monterey 50# bags:5.5. Type II-IV cement 94# bags. Bentonite chips 3/8" 50 lbs bags.

Reviewed By:
John R. Carrow, PG



Project: Earthgrains Baking Companies Inc.	Boring No.: MW-103	Page(s): 2 of 2
Client: Sara Lee Bakery Group, Inc.	Project #: 62402797 / 024530	Date: 1/19/2009
Location: 955 Kennedy St. Oakland, CA	Coordinates: LAT 37.7789437 LON -122.2399131	Datum: NAD 83

BORING/WELL CONSTRUCTION LOG

Drilling Company: Gregg Drilling & Testing, Inc.	Driller: Jason Weff	Logger: Brendon J. Wilder
--	-------------------------------	-------------------------------------

Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY					Flush Mount Vault
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)		Annulus		Surface Completion	
								0 to 6	6 to 8	Type II-IV Cement	3/8" Bentonite Chips		
								0 to 10	2" PVC Sch. 40	0 to 6	Type II-IV Cement		
								10 to 25	2" PVC 0.01" Sch. 40	6 to 8	3/8" Bentonite Chips		
										8 to 25	#2/12 Sand		
Description								Modifier and Main Soil; minor soil components, color, consistency/density, moisture, odor, staining					
21-								Sandy CLAY ; some gravel (sub-angular), dark brown (5 YR 2.5/1), stiff to hard, wet.					21-
22-													22-
23-													23-
24-	S.S.	13:40	10	15	25		<5	Gravelly SAND , sub-angular gravels up to 1", dense, moist, no petroleum odor.					24-
25-								Terminate borehole at 25' bgs @ 13:40, 15' PVC screen with .010 slot, 10' PVC riser.					25-
26-													26-
27-													27-
28-													28-
29-													29-
30-													30-
31-													31-
32-													32-
33-													33-
34-													34-
35-													35-
36-													36-
37-													37-
38-													38-
39-													39-
40-													40-

Notes: Brass sample tubes = 6" in length. Sand #2/12 Monterey 50# bags:5.5. Type II-IV cement 94# bags. Bentonite chips 3/8" 50 lbs bags.

Reviewed By:
John R. Carrow, PG



Project Earthgrains Baking Companies Inc.	Boring No.: MW-104	Page(s): 1 of 2
Client: Sara Lee Bakery Group, Inc.	Project #: 62402797 / 024530	Date: 1/20/2009
Location: 955 Kennedy St. Oakland, CA	Coordinates: LAT 37.7788276 LON -122.2399077	Datum: NAD 83

BORING/WELL CONSTRUCTION LOG

Drilling Company: Gregg Drilling & Testing, Inc.	Driller: Jason Weff	Logger: Brendon J. Wilder
--	-------------------------------	-------------------------------------

Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY				Flush Mount Vault	
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)	Casing and Screen	Depth (ft)	Annulus		Surface Completion
0-1							0 to 10	2" PVC Sch. 40	0 to 6	Type II-IV Cement			
1-2							10 to 25	2" PVC 0.01" Sch. 40	6 to 8	3/8" Bentonite Chips			
2-3									8 to 25	#2/12 Sand			
3-4													
4-5													
5-6	S.S.	7:50	1	2	5	CL	<5						
6-7													
7-8													
8-9													
9-10	S.S.	7:55	2	2	3		<5						
10-11													
11-12													
12-13													
13-14													
14-15	S.S.	8:00	3	4	6		<5						
15-16													
16-17													
17-18													
18-19	S.S.	8:10	6	11	12	GC	<5						
19-20													

Notes: Brass sample tubes = 6" in length. Sand #2/12 Monterey 50# bags:5.5. Type II-IV cement 94# bags. Bentonite chips 3/8" 50 lbs bags.

Reviewed By:
John R. Carrow, PG



Project: Earthgrains Baking Companies Inc.	Boring No.: MW-104	Page(s): 2 of 2
Client: Sara Lee Bakery Group, Inc.	Project #: 62402797 / 024530	Date: 1/20/2009
Location: 955 Kennedy St. Oakland, CA	Coordinates: LAT 37.7788276 LON -122.2399077	Datum: NAD 83

BORING/WELL CONSTRUCTION LOG

Drilling Company: Gregg Drilling & Testing, Inc.	Driller: Jason Weff	Logger: Brendon J. Wilder
--	-------------------------------	-------------------------------------

Depth (ft)	SAMPLE TYPE	SAMPLE TIME	Blow Counts			USCS	PID Readings	WELL CONSTRUCTION SUMMARY					Flush Mount Vault
			Top 6"	Middle 6"	Bottom 6"			Depth (ft)	Casing and Screen	Depth (ft)	Annulus	Surface Completion	
								0 to 10	2" PVC Sch. 40	0 to 6	Type II-IV Cement		
								10 to 25	2" PVC 0.01" Sch. 40	6 to 8	3/8" Bentonite Chips		
										8 to 25	#2/12 Sand		
								Description					
								Modifier and Main Soil, minor soil components, color, consistency/density, moisture, odor, staining					
21-						GC		Clayey GRAVEL; with sand, dark greyish brown Mottled dark grey (10 YR 4/2) and dark yellowish brown, dense, moist.					21-
22-													22-
23-													23-
24-	S.S.	8:15	3	4	5		<5						24-
25-								Terminate borehole at 25' bgs @ 8:20, 15' PVC screen with .010 slot, 10' PVC riser.					25-
26-													26-
27-													27-
28-													28-
29-													29-
30-													30-
31-													31-
32-													32-
33-													33-
34-													34-
35-													35-
36-													36-
37-													37-
38-													38-
39-													39-
40-													40-

Notes: Brass sample tubes = 6" in length. Sand #2/12 Monterey 50# bags:5.5. Type II-IV cement 94# bags. Bentonite chips 3/8" 50 lbs bags.

Reviewed By:
John R. Carrow, PG

**Table 2
Historical Monitoring Well Construction Data**

**Earthgrains Baking Companies, Inc.
955 Kennedy Street
Oakland, California 94606**

Monitoring Well	Date Installed	Casing Elevation ¹ (feet MSL)	Casing Material	Boring Depth (feet bgs)	Well Depth (feet bgs)	Boring Diameter (inches)	Casing Diameter (inches)	Slot Size (inches)	Screened Interval (feet bgs)	Filter Pack Interval (feet bgs)	Filter Pack Sand
MW-1	8/27/1992	10.64 ¹	PVC	31.0	25	8	2	0.010	18.0-25.0	15.5-25.0	#2/12
MW-2	8/27/1992	11.20 ¹	PVC	29.5	29.5	8	2	0.010	18.0-29.5	16.0-29.5	#2/12
MW-3	8/26/1992	10.92 ¹	PVC	27.0	27.0	8	2	0.010	7.0-27.0	6.5-27.0	#2/12
MW-4	8/27/1992	12.04 ¹	PVC	34.0	34.0	8	2	0.010	19.0-34.0	16.0-34.0	#2/12
MW-5	8/26/1992	14.39 ¹	PVC	34.0	34.0	8	2	0.010	24.0-34.0	22.0-34.0	#2/12
MW-101	1/19/2009	13.90 ²	PVC	28.10	28.05	8	2	0.010	18-28	16-28	#2/12
MW-102	1/20/2009	14.19 ²	PVC	28.40	28.35	8	2	0.010	18-28	16-28	#2/12
MW-103	1/19/2009	13.75 ²	PVC	25.00	24.92	8	2	0.010	10-25	8-25	#2/12
MW-104	1/20/2009	13.65 ²	PVC	25.15	25.10	8	2	0.010	10-25	8-25	#2/12
DW-1	1/20/2009	14.05 ²	PVC	14.65	14.60	12	6	0.020	5-15	3-15	#2/12

Notes:

MW-1 through MW-5 were properly abandoned in 1996

bgs - below ground surface

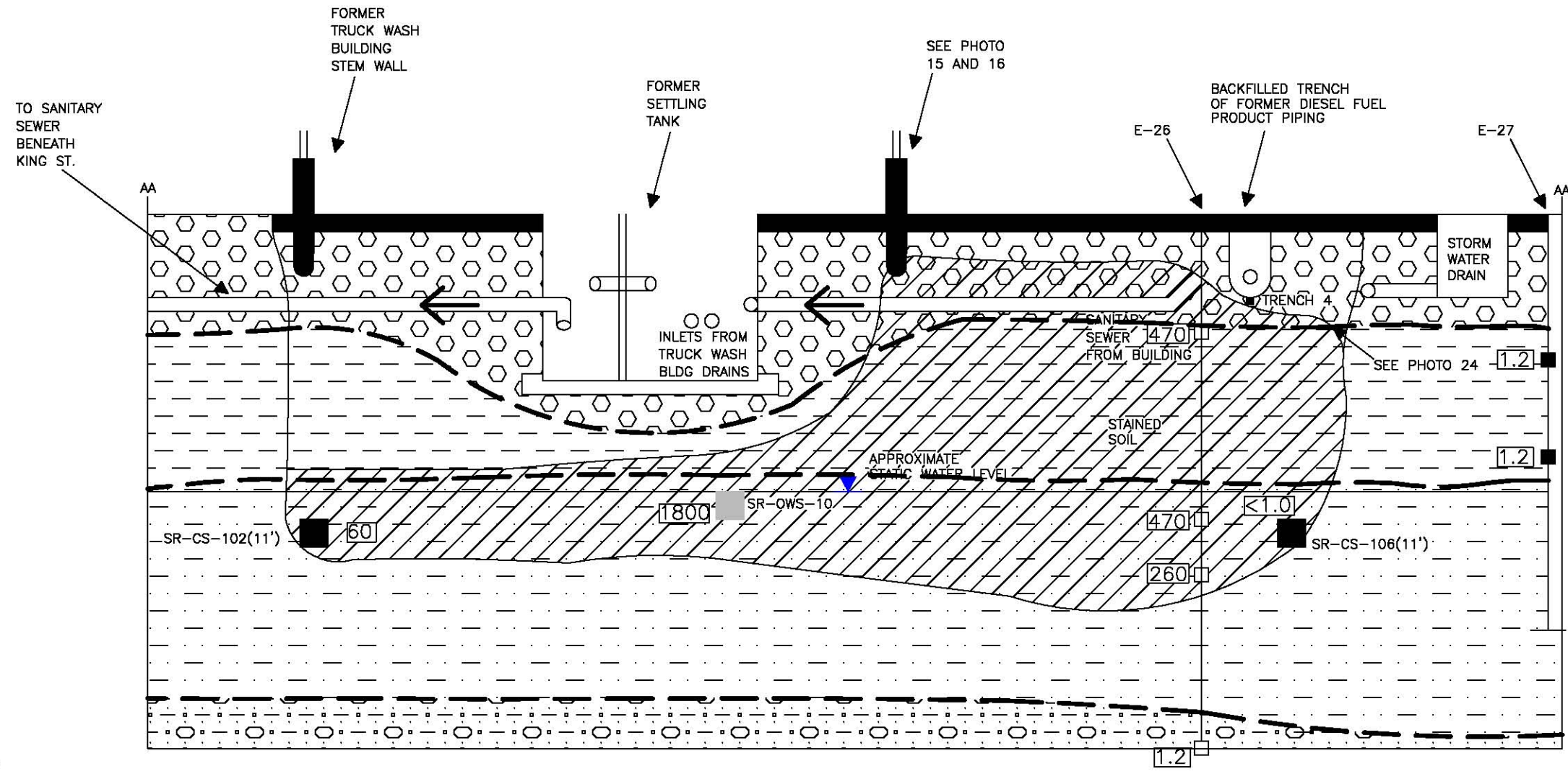
DW - dewatering well

MSL - mean sea level









PVC - poly-vinyl chloride (Schedule 40)

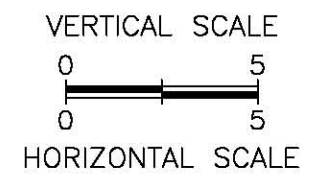
1 - Well casing elevations surveyed on January 26, 1994.

2 - Well casing elevations surveyed on January 28, 2009 by PLS Surveys, Inc. according to NAVD88 datum



LEGEND

-  STAINED SOIL
-  SOURCE REMOVAL VERIFICATION AND CONFIRMATION SAMPLES SHOWING TPH-d CONCENTRATIONS IN SOIL (mg/kg), VERIFICATION SAMPLES SHOWN AS GRAY
-  HISTORICAL SOIL SAMPLE LOCATIONS SHOWING TPH-d CONCENTRATIONS IN SOIL (mg/kg)
-  FILL
-  GRAVEL, SAND, AND CLAY MIXTURES
-  SILT AND CLAY
-  SAND, SILT AND CLAY MIXTURES
-  APPROXIMATE STATIC WATER LEVEL



C002 H:\Drafting\624\02797E-AA TO AA'

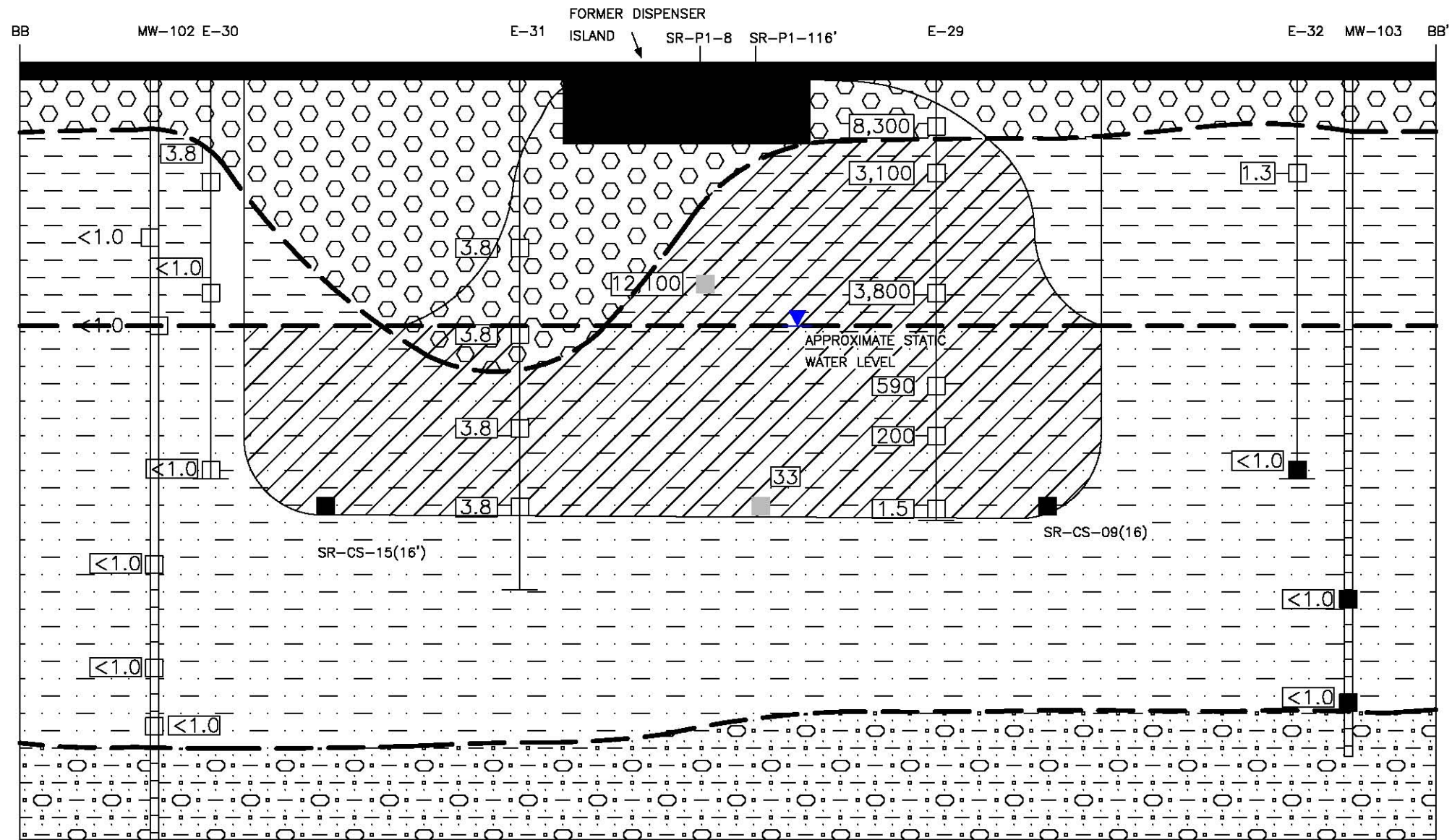


TITLE:
SOURCE REMOVAL CROSS SECTION AA-AA'

DWN: MMK	DES: JC
CHKD:	APPD:
DATE: 4/6/11	REV:

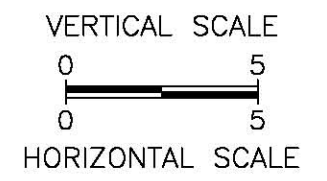
PROJECT NO: 624.0908.0118
EARTHGRAINS
OAKLAND CA

FIGURE 5



LEGEND

- STAINED SOIL
- SOURCE REMOVAL VERIFICATION AND CONFIRMATION SAMPLES SHOWING TPH-d CONCENTRATIONS IN SOIL (mg/kg), VERIFICATION SAMPLES SHOWN AS GRAY
- HISTORICAL SOIL SAMPLE LOCATIONS SHOWING TPH-d CONCENTRATIONS IN SOIL (mg/kg)
- FILL
- SILT AND CLAY
- SAND, SILT AND CLAY MIXTURES
- GRAVEL, SAND, AND CLAY MIXTURES
- APPROXIMATE STATIC WATER LEVEL



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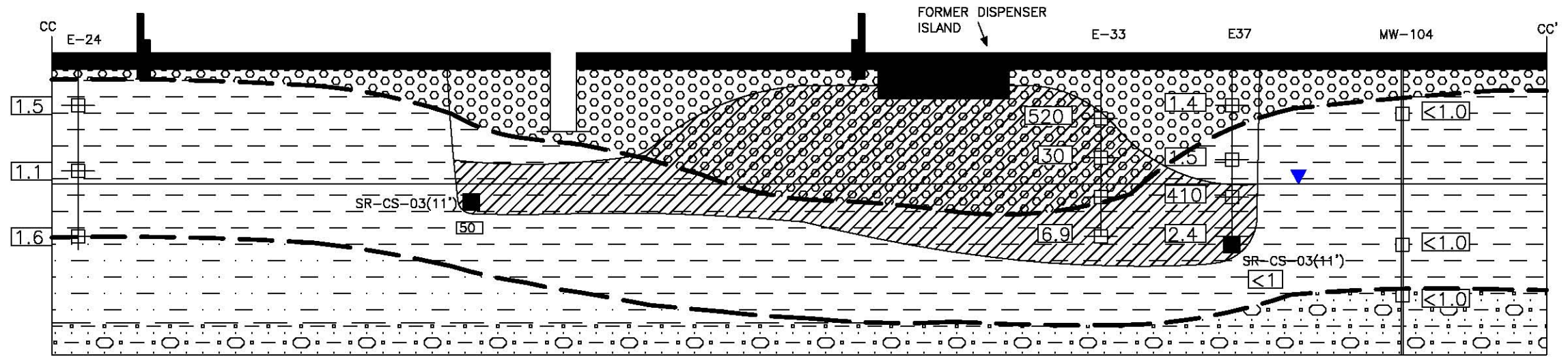


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







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DATE: 4/6/11	REV:

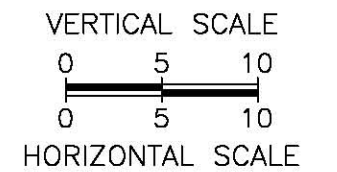
PROJECT NO: 624.0908.0118
OAKLAND
OAKLAND CA

FIGURE 6



LEGEND

-  STAINED SOIL
-  SOURCE REMOVAL VERIFICATION AND CONFIRMATION SAMPLES SHOWING TPH-d CONCENTRATIONS IN SOIL (mg/kg)
-  HISTORICAL SOIL SAMPLE LOCATIONS SHOWING TPH-d CONCENTRATIONS IN SOIL (mg/kg)
-  FILL
-  SILT AND CLAY
-  SAND, SILT AND GRAVEL MIXTURES
-  APPROXIMATE STATIC WATER LEVEL
-  GRAVEL, SAND, AND CLAY MIXTURES



C002 H:\Drafting\624\02797E-CC TO CC

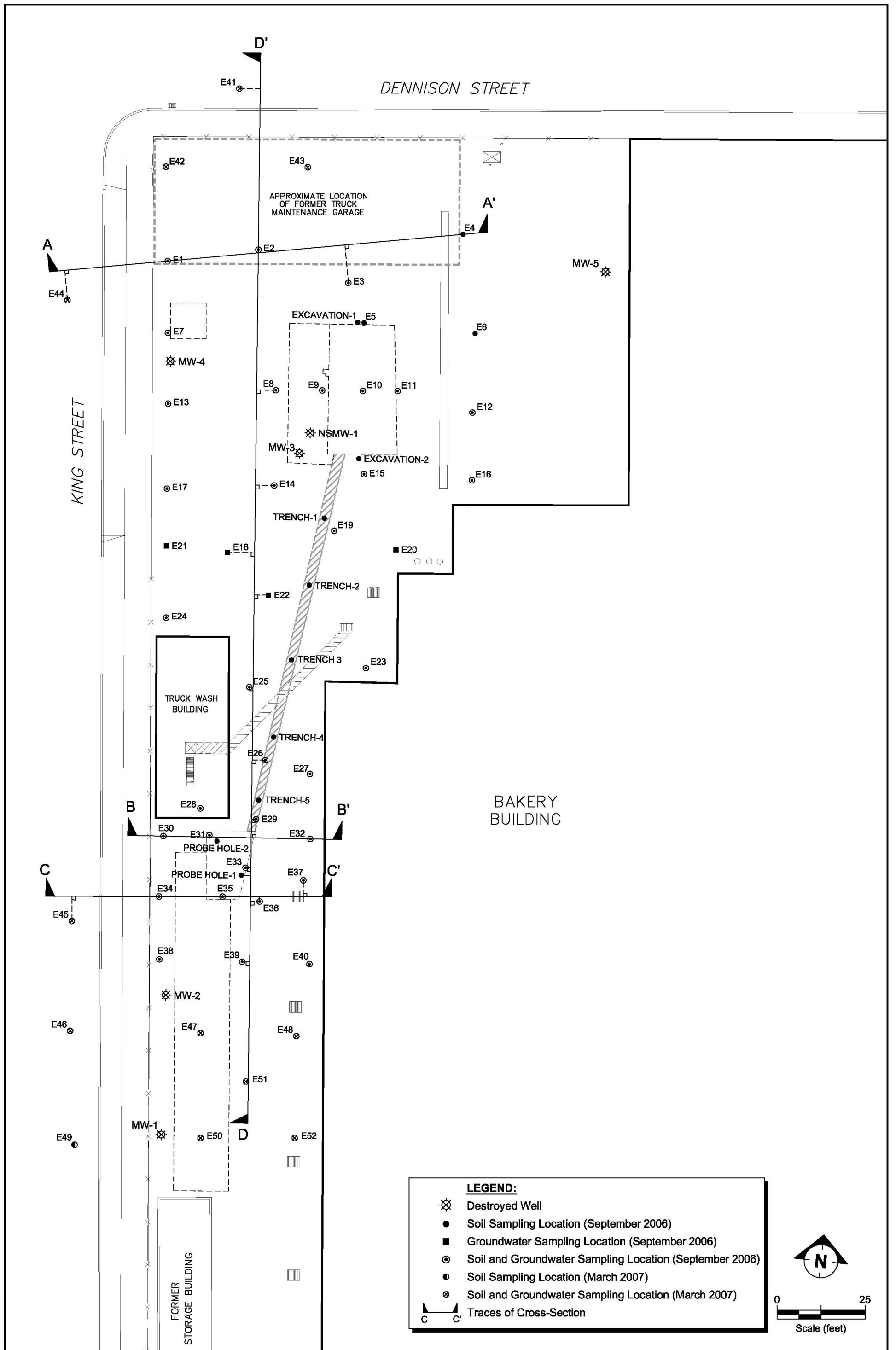


TITLE:
SOURCE REMOVAL CROSS SECTION CC-CC'

DWN: MMK	DES: JC
CHKD:	APPD:
DATE: 4/6/11	REV:

PROJECT NO: 624.0908.0118
EARTHGRAINS
OAKLAND CA

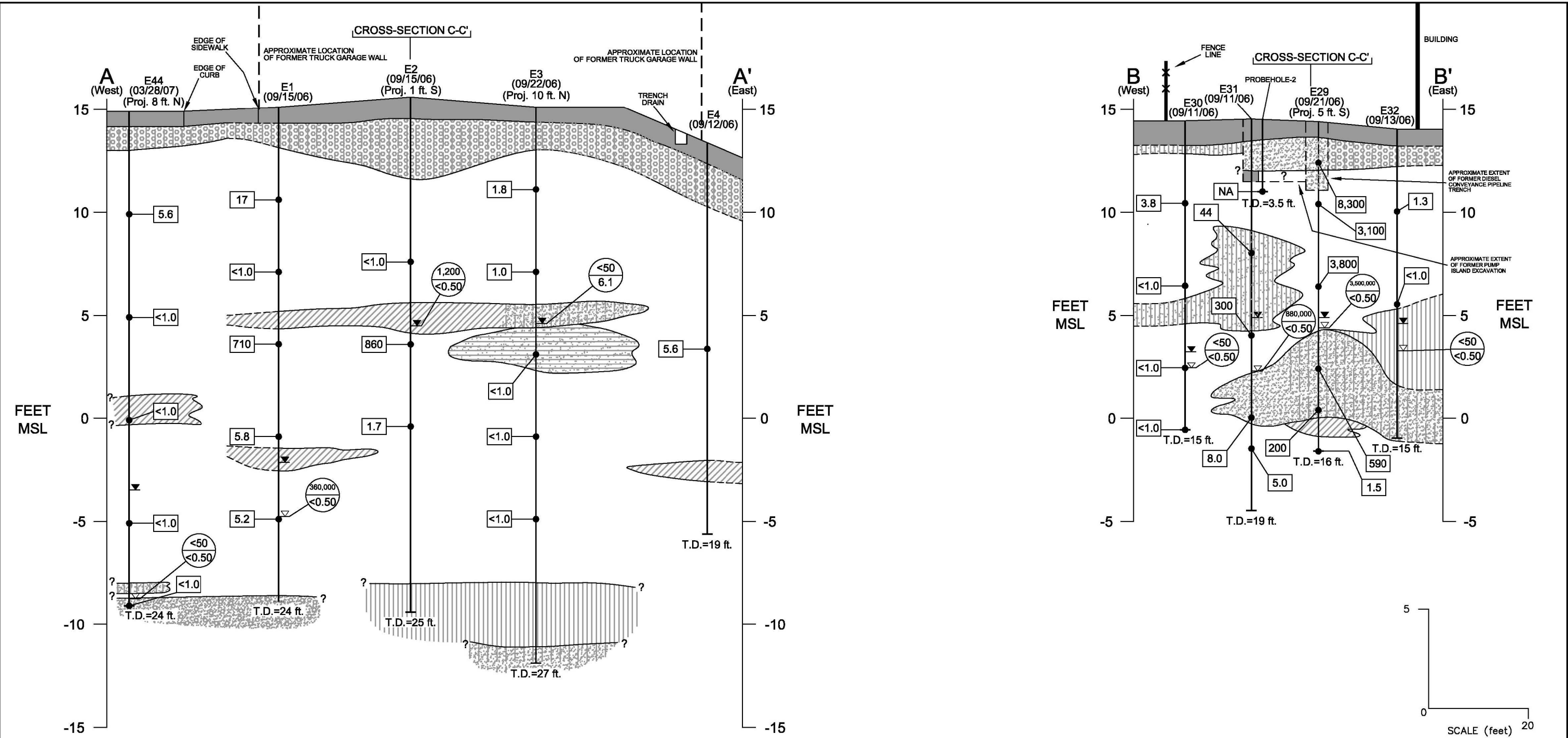
FIGURE 7



SITE MAP SHOWING SAMPLING LOCATIONS AND TRACES OF GEOLOGIC CROSS-SECTIONS
 EARTHGRAINS BAKING COMPANIES, INC.
 955 KENNEDY STREET
 OAKLAND, CALIFORNIA 94606

FIGURE:
3

FILENAME: SITE1106.DWG 11/30/06



LEGEND

Boring — Boring ID

Soil Sample — [Symbol] Analytical Data for Soil

Static Groundwater Level — [Symbol]

First Encountered Groundwater (during drilling) — [Symbol]

Bottom of Boring — [Symbol]

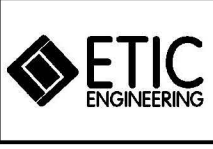
TPH-d Analytical Data for Groundwater

TPH-d
MTBE

[Symbol] Concrete	[Symbol] Predominantly Silt
[Symbol] Silty Gravel	[Symbol] Silty Sand
[Symbol] Clay and Silty Clay	[Symbol] Gravelly Sand
[Symbol] Clayey Silt	[Symbol] Predominantly Sand
[Symbol] Sandy Silt	[Symbol] Sandy Clay

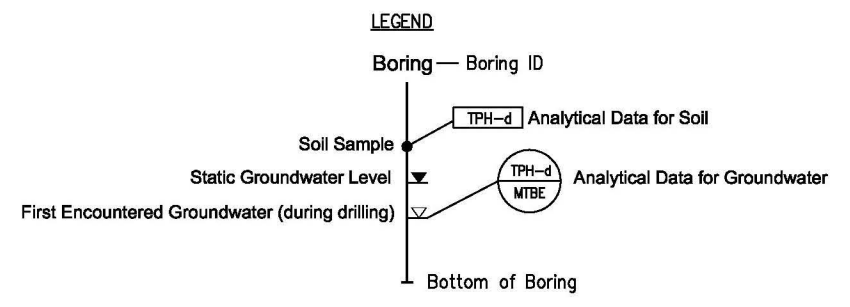
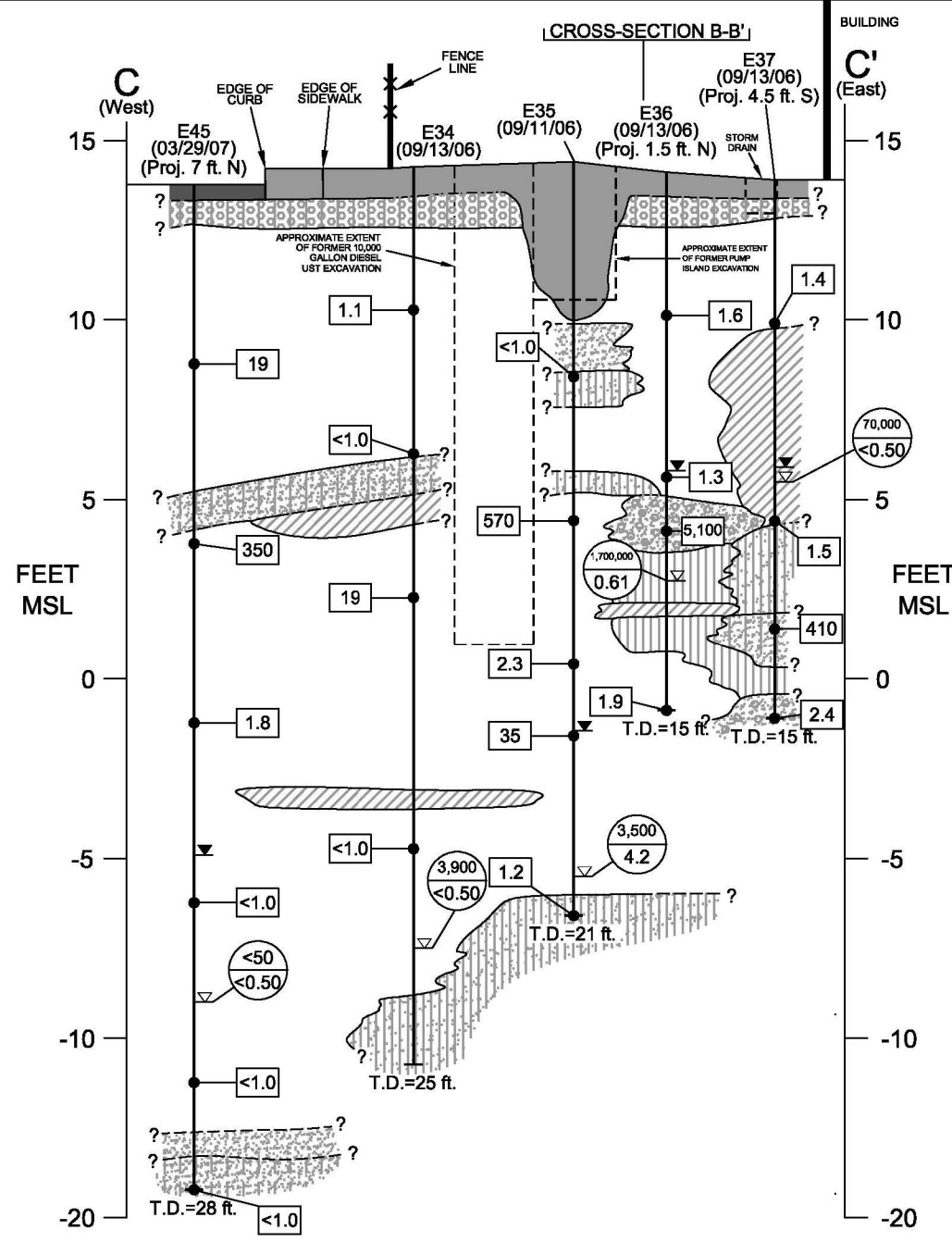
TPH-d Total Petroleum Hydrocarbons quantified as diesel
 MTBE Methyl Tertiary Butyl Ether
 NA Not Analyzed
 T.D. Total Depth of Boring
 MSL Mean Sea Level
 Proj. Projected

Notes:
 Soil analytical data in milligrams per kilogram (mg/kg).
 Groundwater analytical data in micrograms per liter (ug/L).
 Elevations are relative to North American Vertical Datum of 1988.



GEOLOGIC CROSS-SECTIONS A-A' AND B-B'
 EARTHGRAINS BAKING COMPANIES, INC.
 955 KENNEDY STREET
 OAKLAND, CALIFORNIA 94606

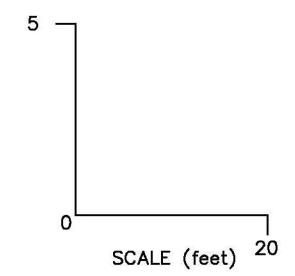
FIGURE:
4



	Concrete		Predominantly Silt
	Silty Gravel		Silty Sand
	Clay and Silty Clay		Gravelly Sand
	Clayey Silt		Predominantly Sand
	Sandy Silt		Sandy Clay

- TPH-d Total Petroleum Hydrocarbons quantified as diesel
- MTBE Methyl Tertiary Butyl Ether
- NA Not Analyzed
- T.D. Total Depth of Boring
- MSL Mean Sea Level
- Proj. Projected

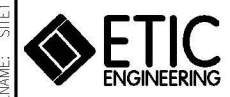
Notes:
 Soil analytical data in milligrams per kilogram (mg/kg).
 Groundwater analytical data in micrograms per liter (ug/L).
 Elevations are relative to North American Vertical Datum of 1988.

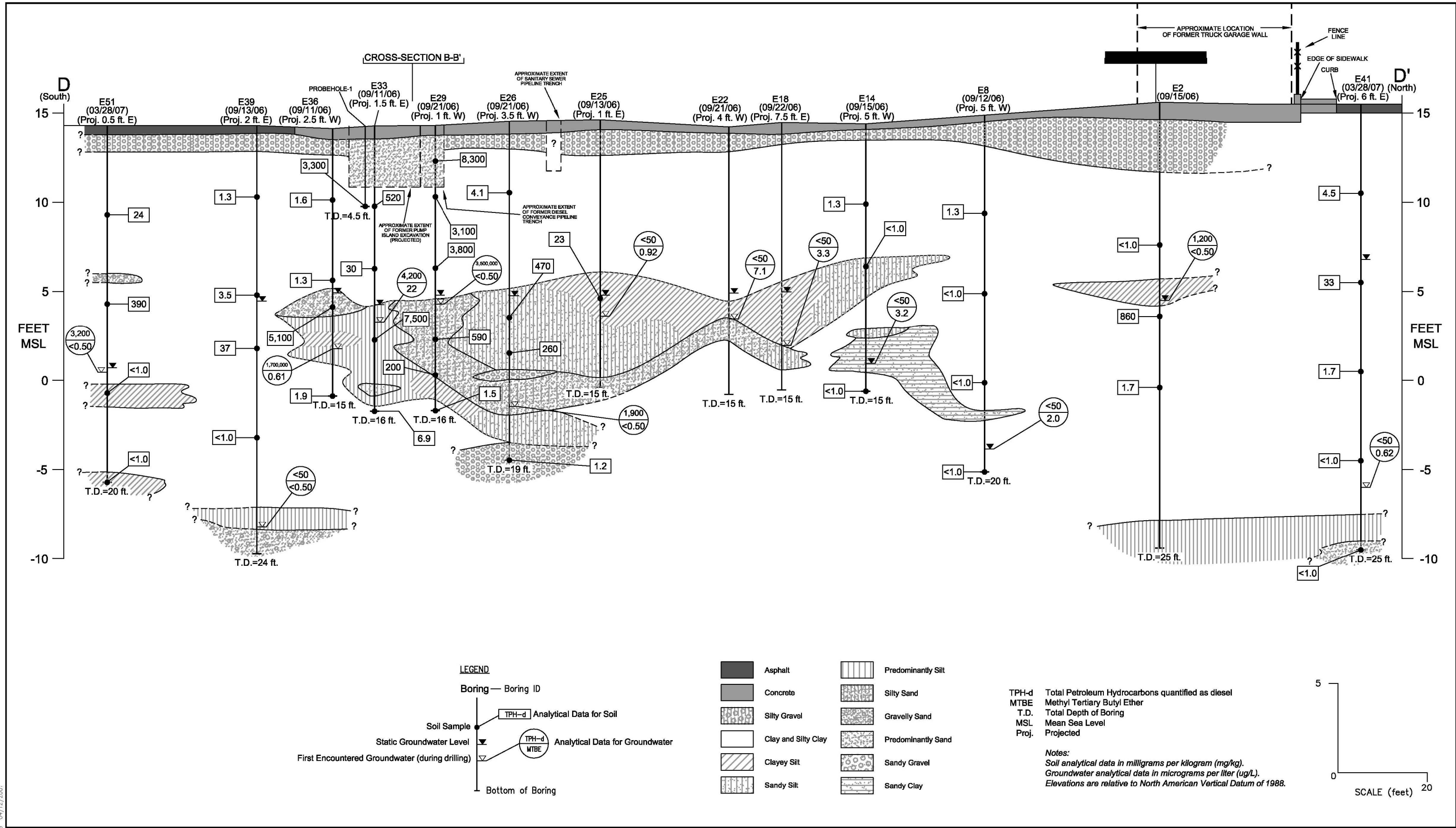


GEOLOGIC CROSS-SECTION C-C'
 EARTHGRAINS BAKING COMPANIES, INC.
 955 KENNEDY STREET
 OAKLAND, CALIFORNIA 94606

FIGURE:
5

FILENAME: SITE1106.DWG 11/30/06





GEOLOGIC CROSS-SECTION D-D'
EARTHGRAINS BAKING COMPANIES, INC.
 955 KENNEDY STREET
 OAKLAND, CALIFORNIA 94606

FIGURE:
6

FILENAME: 102007.DWG 04/12/2007

