January 11, 1999

SECOR
International Incorporated

Ms. Madhulla Logan
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

LETTER OF CLARIFICATION, SUBSURFACE INVESTIGATION AND SITE CLOSURE TASKS, FORMER SEARS BUILDING, 2633 TELEGRAPH AVENUE, OAKLAND, CALIFORNIA, FOR THE ALEXANDER HAAGEN COMPANY, INC.

Dear Ms. Logan:

SECOR International Incorporated (SECOR) has prepared this letter based upon our conversation of January 7, 1999 regarding our investigation of the southeastern corner of property located at 2633 Telegraph Avenue in Oakland, California (the Site). As you know, we performed those tasks described in our October 27, 1998 Work Plan, which was approved by the Alameda County Health Care Services Agency (ACHSA) on October 29, 1998. Our December 2, 1998 Summary Report presented the results of our investigation. The investigation was performed to further investigate the extent of and likely source(s) for stoddard solvent found in one soil and one grab groundwater sample at the southern portion of the Site (see attached Figure). To that end, SECOR's investigation included analysis of samples for total petroleum hydrocarbons as stoddard solvent (TPHs) and benzene, toluene, ethylbenzene, and xylenes (BTEX).

During our recent discussion, you requested clarification regarding the types of analyses performed on soil and grab water samples collected from the Site as well as the analytical results. Please find attached, revised Tables presenting a more comprehensive listing of the analyses performed and the analytical results. As shown, the majority of soil and grab water samples, such as those collected on November 9, 1998, were analyzed on-site by a mobile laboratory operated by Mobile Chem Labs. The remaining soil and grab water samples (those collected on November 10, 1998) were analyzed by Chroma Lab at their fixed location in Pleasanton, California for TPHs, BTEX, and in some instances for volatile organic compounds (VOCs) and/or for the petroleum hydrocarbon range. The additional analyses were performed on selected samples to further investigate or confirm the presence of compounds apparently related to the dry cleaning operation.

The analytical results, including those previously reported by Lowney & Associates, reveal TPHs in only one of the analyzed soil samples, collected from boring EB-5 at a concentration of 280 milligrams per kilogram (or mg/kg). TPHs was not reported in any other soil sample analyzed. Groundwater in the immediate vicinity of the dry cleaning facility also yielded TPHs. The greatest TPHs concentration (9,100 parts per billion or ppb) was reported in the water sample collected from boring EB-4 located adjacent to the southern Site boundary. The water sample collected from boring EB-14 located approximately 15 feet northeast of boring EB-4 yielded the only other reported TPHs concentration of 2,300 ppb. None of the other analyzed water samples yielded TPHs in concentrations at or above the laboratory reporting limits. Low concentrations of trichloroethene (TCE) and tetrachloroethene (PCE) were respectively reported in the grab water and soil samples collected from borings EB-14 and EB-13. Additional analyses were not possible, due to sample holding time limitations and the limited volume of water sample collected.
Table only shows EB-14 as being analyzed

The data indicate groundwater near the dry cleaning facility has been impacted by TPHs, with lesser amounts of related compounds such as TCE and PCE present in water and soil nearby. The presence of TPHs does not appear to be related to the presence of bunker oil, diesel, and other hydrocarbon compounds found in the subsurface beneath the northern and western portions of the Site. We believe that the lack of TPHs concentrations in on-site soil samples and the lack of a documented on-site source for TPHs, coupled with significant TPHs concentrations in water samples collected immediately adjacent to the most likely source, a dry cleaner, justify that any further request for investigation and/or mitigation be directed toward the party responsible for the dry cleaning facility.

A

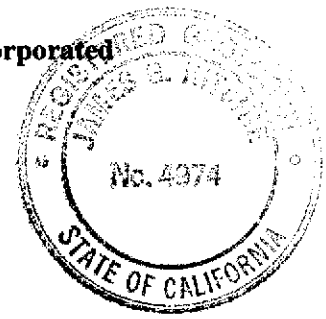
1225 Pear Avenue, Suite 110, Mountain View, CA 94043 (650) 691-0131 (650) 691-9837 Fax www.secor.com

Thank you for your attention to this project. We trust that this letter adequately addresses your concerns and we would appreciate your advising us as to our request for no further action of our client. Please do not hesitate to contact us at (650) 691-0131 with any questions or comments.

Sincerely yours,

SECOR International Incorporated

James G. Ritchie, R.G.
Principal Geologist



Attachments:
Table 1 - Soil Analytical Results - Petroleum Hydrocarbons
Table 2 - Soil Analytical Results - Volatile Organic Compounds
Table 3 - Groundwater Analytical Results - Petroleum Hydrocarbons/Volatile Organic Compounds
Figure 2 - Site Plan

TABLE 1
SOIL ANALYTICAL RESULTS
Petroleum Hydrocarbons
(EPA Methods 5030, 8015 Modified, and 8260)
2633 Telegraph Ave.
Oakland, CA.

Sample Number and Depth	Date	TPHs[1] (mg/kg)[2]	TPHb[3] (mg/kg)	TPHo[4] (mg/kg)	TPHd[5] (mg/kg)
EB-13-7	11/9/98	N.D.[a]	N.A.[b]	N.A.	N.A.
EB-13-16	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-14-4	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-14-7	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-15-6	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-15-13	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-16-7	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-16-13	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-18-4	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-18-16	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-18-22	11/9/98	N.D.	N.A.	N.A.	N.A.
EB-19-22	11/10/98	N.D.	N.D.	N.D.	5.8
EB-20-7	11/10/98	N.D.	N.D.	70	160
EB-20-13	11/10/98	N.D.	N.D.	N.D.	140
EB-20-22	11/10/98	N.D.	N.D.	N.D.	4.0
EB-21-22	11/10/98	N.D.	N.D.	N.D.	4.7

1. Total Petroleum Hydrocarbons as Stoddard Solvent.

2. Milligrams per kilogram.

3. Total Petroleum Hydrocarbons as bunker oil.

4. Total Petroleum Hydrocarbons as motor oil.

5. Total Petroleum Hydrocarbons as diesel.

---

[a] N.D.: not detected above specified laboratory reporting limits.

[b] N.A.: not analyzed.

H:\HAAGEN\TBL1.WPD

TABLE 2
SOIL ANALYTICAL RESULTS
Volatile Organic Compounds
(EPA Methods 8020 and 8260)
2633 Telegraph Ave.
Oakland, CA.

Sample Number and Depth	Date	Benzene (μg/kg)[1]	Toluene (μg/kg)	Ethylbenzene (μg/kg)	Total Xylenes (μg/kg)	Isopropyl-benzene (μg/kg)	PCE[2] (μg/kg)
EB-13-7	11/9/98	N.D.[a]	N.D.	N.D.	N.D.	N.D.	**19**
EB-13-16	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.[b]	N.A.
EB-14-4	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-14-7	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-15-6	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-15-13	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-16-7	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-16-13	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-18-4	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-18-16	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-18-22	11/9/98	N.D.	N.D.	N.D.	N.D.	N.A.	N.A.
EB-19-22	11/10/98	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
EB-20-7	11/10/98	N.D.	N.D.	**44**	N.D.	**45**	N.D.
EB-20-13	11/10/98	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
EB-20-22	11/10/98	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.
EB-21-22	11/10/98	N.D.	N.D.	N.D.	N.D.	N.D.	N.D.

1. Micrograms per kilogram.

2. Tetrachloroethene.

---

[a] N.D.: Not detected above specified laboratory reporting limits of 5.0 μg/kg.

[b] N.A.: Not analyzed.

H:\HAAGEN\TBL2.WPD

TABLE 3
GROUNDWATER ANALYTICAL RESULTS
Petroleum Hydrocarbons / Volatile Organic Compounds
(EPA Methods 5030, 8015 Modified, and 8020)
2633 Telegraph Ave.
Oakland, CA.

Sample Number	Date	TPHs[1] (µg/L)[2]	Naph-thalene (µg/L)	TCE[3] (µg/L)	IPB[4] (µg/L)	Ben-zene (µg/L)	Toluene (µg/L)	Ethyl-benzene (µg/L)	Total Xylenes (µg/L)
EB-13	11/9/98	N.D.[a]	N.A.[b]	N.A.	N.A.	N.D.	N.D.	N.D.	N.D.
EB-14	11/9/98	**2,300 (1,200)[c]**	**11**	**5.7**	**62**	N.D.	N.D.	**3.2 (5.9)**	**6.1** (N.D.)
EB-15	11/9/98	N.D.	N.A.	N.A.	N.A.	N.D.	N.D.	N.D.	N.D.
EB-18	11/9/98	N.D.	N.A.	N.A.	N.A.	N.D.	N.D.	N.D.	N.D.

1. Total Petroleum Hydrocarbons as Stoddard Solvent.

2. Micrograms per liter.

3. Trichloroethene.

4. Isopropylbenzene.

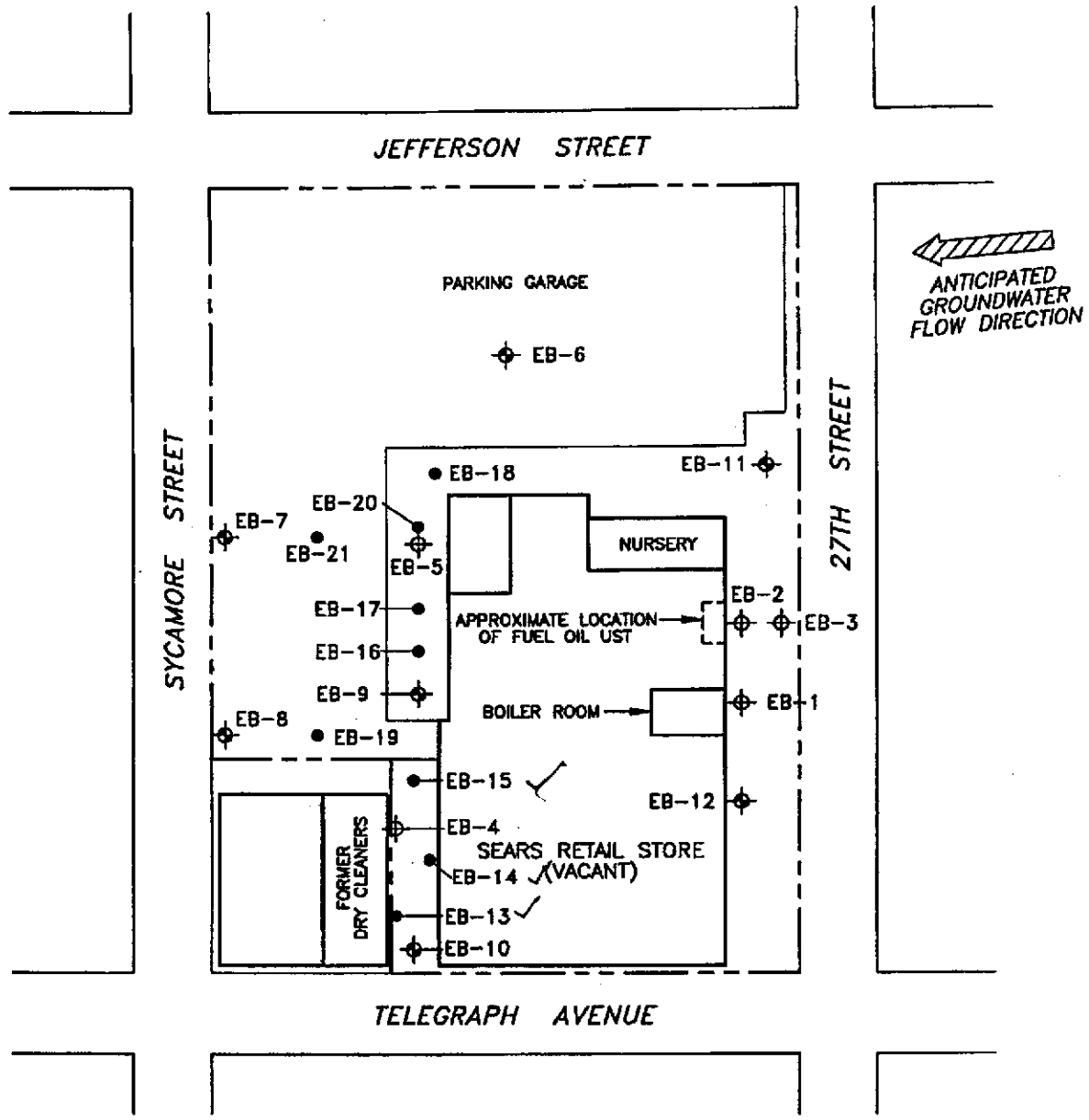
---

[a] N.D.: not detected above specified laboratory reporting limits.

[b] N.A.: not analyzed.

[c] Results in parentheses from Chromalab.

H:\HAAGEN\TBL3.WPD



LEGEND:

- ⊕ EB-1 APPROXIMATE LOCATION OF EXPLORATORY BORING (4/98)
- ⊕ EB-11 APPROXIMATE LOCATION OF EXPLORATORY BORING (5/98)
- ● EB-13 APPROXIMATE LOCATION OF EXPLORATORY BORING (11/98)
- — — — APPROXIMATE PROPERTY BOUNDARY

NOTES:
1. GROUNDWATER GRAB SAMPLES AT EB-13, EB-14, EB-15, AND EB-18.
2. SOIL AND GROUNDWATER ANALYTICAL RESULTS PRESENTED IN TABLES 1-3.

REFERENCE: THIS FIGURE IS TAKEN FROM LOWNEY ASSOCIATES, AND IS INTENDED FOR ILLUSTRATION ONLY.

0 100 200
APPROXIMATE SCALE FEET

SECOR INTERNATIONAL INCORPORATED

DRAWN	CCR
APPR	RP
DATE	19NOV98
JOB NO.	60057-001-01

FIGURE 2
HAAGEN – OAKLAND
2633 TELEGRAPH AVENUE
OAKLAND, CALIFORNIA

SITE PLAN

199811.191829 X:\JOBS\HAAGEN\81TEPLAN