

Wickham, Jerry, Env. Health

From: Wickham, Jerry, Env. Health
Sent: Tuesday, January 16, 2007 4:25 PM
To: 'Debra_Stott@URSCorp.com'
Subject: RE: well abandonment Bridgeside Shopping center SLIC case R00002738

Debra,

For any wells such as MW-3 which you cannot locate, you must make all reasonable attempts to locate and decommission.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

-----Original Message-----

From: Debra_Stott@URSCorp.com [mailto:Debra_Stott@URSCorp.com]
Sent: Friday, January 12, 2007 2:29 PM
To: Wickham, Jerry, Env. Health
Subject: Fw: well abandonment Bridgeside Shopping center SLIC case R00002738

This e-mail and any attachments are confidential. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.

Mr. Wickham,

Thank you for your assistance with this project.

Based on the letter dated January 3, 2007, URS is arranging for the abandonment of the 2-inch monitoring wells at the Bridgeside shopping center. This is to inform you that that well MW-3 was inadvertently damaged beyond our ability to relocate during the construction process.

URS was able to protect well MW-1 and will include it in the decommissioning. URS will soon be meeting with the site construction manager to attempt to locate well MW-2.

We will keep you informed of the results and provide a decommissioning report soon.

Thank you

Debbie Stott

URS Corporation
915 Wilshire Boulevard, Suite 700
Los Angeles, CA 90017
213-996-2441, fax 213-996-2456
debra_stott@urscorp.com

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ALAMEDA COUNTY
HEALTH CARE SERVICES



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AGENCY

DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

January 3, 2007

Mr. Scott Kyman
Regency Centers
1850 Mt. Diablo Boulevard, Suite 225
Walnut Creek, CA 94596

Subject: SLIC Case No. RO0002738, Bridgeside Shopping Center, 2523-2691 Blanding Avenue, Alameda, CA – Request for Well Decommissioning

Dear Mr. Kyman:

Alameda County Environmental Health (ACEH) and California Regional Water Quality Control Board staff have reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file and case closure summary for the above-referenced site and concur that no further action related to the SLIC case is required at this time. Prior to issuance of a case closure letter, the monitoring wells at the site are to be properly decommissioned, should the monitoring wells have no further use at the site. Please decommission the monitoring wells and provide documentation of the well decommissioning to this office. A case closure letter will be issued following receipt of the documentation and receipt of regulatory oversight funds as requested in our December 21, 2006 correspondence, which is attached.

Well destruction permits may be obtained from the Alameda County Public Works Agency (<http://www.acgov.org/pwa/wells/index.shtml>). If you have any questions, please call me at (510) 567-6791.

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Attachment: ACEH Correspondence Dated December 21, 2006

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Jung Hwan Jeff Paik, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612-1924

Debra Stott, URS Corporation, 915 Wilshire Boulevard, Suite 700, Los Angeles, CA 90017

Donna Drogos, ACEH
Jerry Wickham
ACEH File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

December 21, 2006

Mr. Scott Kyman
Regency Centers
555 South Flowers Street, Suite 3500
Los Angeles, CA 90071

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

Subject: SLIC Case No. R00002738, Bridgeside Shopping Center, 2523-2691 Blanding Avenue, Alameda, CA

Dear Mr. Kyman:

Our records indicate that the current balance on the above-referenced SLIC oversight account is a negative \$478.60. In order to complete regulatory oversight, we are requesting the submittal of a check made payable to Alameda County Environmental Health in the amount of \$1,000.00. Please send your check to the attention of our Finance Department.

This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address, and the AR# 0312477 on your check.

If you have any questions, please contact Jerry Wickham at (510) 567-6791.

Sincerely,



Arri Levi
Division Chief

cc: D. Drogos, J. Jacobs, Jerry Wickham

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
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(510) 567-6700
FAX (510) 337-9335

September 27, 2006

Mr. Scott Kyman
Regency Centers
1850 Mt. Diablo Boulevard, Suite 225
Walnut Creek, CA 94596

Subject: SLIC Case No. [REDACTED] Bridgeside Shopping Center, 2523-2691 Blanding Avenue,
Alameda, CA

Dear Mr. Kyman:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and correspondence entitled, "Response to Comments, SLIC Case RO0002738," dated September 11, 2006. The correspondence, which was prepared on your behalf by URS Corporation, presents responses to technical comments contained in ACEH correspondence dated August 10, 2006. The responses are generally acceptable; however, we require clarification of the revised location of the excavation in the former Dry Cleaner Area as discussed in technical comment 1 below. Upon clarification of the information requested in the technical comments below, the case will be further reviewed for potential case closure.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Revised Figure 5.** The September 11, 2006 Response to Comments includes a revision of Figure 5, which shows Confirmation Soil Samples in the Former Dry Cleaner excavation. Figure 5 was revised to show the excavation limits and confirmation sample locations on an aerial photograph of the site. The orientation of the excavation and the locations of confirmation soil samples have apparently changed from previous versions of Figure 5. These changes are not discussed in the text of the Response to Comment 3, which discusses Revised Figure 5. Please verify that the revised orientation of the excavation and the confirmation soil sample locations is correct as shown on the current version of Figure 5 provided in the September 11, 2006 Response to Comments.
2. **Units for VOC Concentrations in Legend of Figure 5.** Please verify that the concentrations for VOCs shown on Figure 5 are in milligrams per kilogram rather than g/kg as shown in the legend.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **October 30, 2006** – Verification of Revised Excavation Orientation on Figure 5

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

Effective **January 31, 2006**, 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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

Scott Kyman
September 27, 2006
Page 3

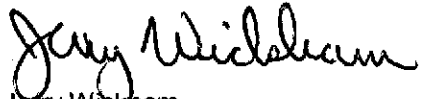
present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

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.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Jung Hwan Jeff Paik, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612-1924

Debra Stott, URS Corporation, 915 Wilshire Boulevard, Suite 700, Los Angeles, CA 90017

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

To: Debra_Stott@URSCorp.com
Cc: Jung-Hwan_Paik@URSCorp.com; Lois_Autie@URSCorp.com
Subject: RE: SLIC case RO0002738 Bridgeside Shopping Center

Ms. Stott,

We replied to the September 11, 2006 comments in correspondence dated September 27, 2006. We have received your more recent response to comments uploaded on October 3, 2006. I have reviewed those responses and have no comments at this time. The site is under review for possible closure.

Regards,
Jerry Wickham
Alameda County Environmental Health

-----Original Message-----

From: Debra_Stott@URSCorp.com [mailto:Debra_Stott@URSCorp.com]
Sent: Thursday, November 02, 2006 11:53 AM
To: Wickham, Jerry, Env. Health
Cc: Jung-Hwan_Paik@URSCorp.com; Lois_Autie@URSCorp.com
Subject: SLIC case RO0002738 Bridgeside Shopping Center

Mr. Wickham,

I am following up to make sure that you received the URS response to comments uploaded September 11, 2006 for the Brisgeside Shopping Center. Do you have additional questions or comments?

Debbie Stott
URS Corporation
915 Wilshire Boulevard, Suite 700
Los Angeles, CA 90017
213-996-2441, fax 213-996-2456
debra_stott@urscorp.com

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ALAMEDA COUNTY
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
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(510) 567-6700
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August 10, 2006

Mr. Scott Kyman
Regency Centers
555 South Flowers Street, Suite 3500
Los Angeles, CA 90071

Subject: SLIC Case No. ~~RO0002738~~ Bridgeside Shopping Center, 2523-2691 Blanding Avenue,
Alameda, CA

Dear Mr. Kyman:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and correspondence entitled, "Response to Comments, SLIC Case RO0002738," dated July 14, 2006 and received by ACEH on August 1, 2006. The correspondence, which was prepared on your behalf by URS Corporation, provides referenced reports and presents responses to technical comments contained in ACEH correspondence dated April 27, 2006. The ACEH correspondence dated April 27, 2006 indicated that further information was required prior to making a determination regarding case closure. The information in the July 14, 2006 Response to Comments does not fully address our April 27, 2006 comments and does not provide sufficient information to support case closure. As discussed in greater detail in the technical comments below, we request that you survey the locations of the excavations and submit a revised Response to Comments that includes revised figures by **September 15, 2006**.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Other Potential Sources of Hydrocarbon.** Based on the currently available information, no further investigation of reports of "periodical dumping on the site," is required at this time.
2. **Revised Figure 4 and Documentation of UST Excavation.** Figure 4 was revised by simplification of the displayed analytical data and by adding the locations of water lines at the edges of the excavation. However, Figure 4 does not include any site features or reference points for orientation and no analytical data or sampling locations from previous site investigations to allow a comparison of the limits of the excavation to the extent of contamination identified during previous sampling. The explanation that the location of site features in relation to the UST excavation cannot be shown because the site landmarks were demolished prior to the start of excavation is not sufficient justification for the location of the excavation remaining uncertain and brings into question how the excavation was located in the field.

The Response to Comments indicates that the excavated area included the locations of borings GP-7, GP-8, GP-9, GP-10, and GP-12 but it is not clear how this was determined since the limits of the excavation were not referenced to site features. A comparison of the general outline of the excavations on the Site Plan (Figure 2 of the CAP) to the locations of borings GP-7, GP-8, GP-9, GP-10, and GP-12 shown on Figure 3 of the CAP suggests that borings GP-7, GP-8, GP-10, and GP-12 may be outside the excavation or may be at the edge of the excavation.

Based on the limited information presented in the CAP and Response to Comments, the UST excavation appears to have been poorly documented. There is no description of observations or screening during excavation or how confirmation soil sampling locations were selected. The CAP indicates that confirmation samples were collected at approximately 10-foot intervals along the sidewalls; however, inspection of Figure 4 indicates that several sidewall samples are more than 20 feet apart. The depth at which the confirmation soil samples were collected is generally described as 8 feet below ground surface. The apparent collection of confirmation soil samples at a standard depth and lack of descriptions of contaminated soil or screening brings into question whether soil contamination, which occurred at depths other than 8-feet bgs, was left in place and excluded from confirmation sampling. The depths at which soil samples were collected from the bottom of the excavation were not specified. It is not clear whether the excavation was extended to a uniform depth and what that depth was or whether the excavation was extended to greater depths in areas of heavier contamination. Review of the 2003 Northgate boring logs, indicates that soil contamination in this area extended below depths of 8 feet bgs. The effectiveness of the excavation cannot be evaluated due to the generally poor documentation of the excavation along with the uncertainty of the location for the excavation. Therefore, we request that the location of the excavation be verified by surveying the corners of the UST excavation, at a minimum. The outline of the UST excavation is to be plotted on a revised UST excavation figure that shows the surveyed location of the UST excavation, outlines of demolished buildings, outlines of planned buildings, and locations of subsurface utilities. The revised UST Excavation figure is to be submitted along with a revised Response to Comments.

- 3. Revised Figure 5 and Documentation of Dry Cleaner Excavation.** The Dry Cleaner excavation was apparently extended to a depth of four to five feet bgs. Confirmation samples were apparently collected at the bottom of the excavation (assumed to be four to five feet bgs) but no depths are indicated for individual samples. No sidewall samples were collected although the highest concentrations of VOCs detected during previous investigations were collected at depths of less than 1.5 feet bgs. The highest concentrations of VOCs were previously detected at depths of 1 to 1.5 feet bgs at sampling locations GP-16 and GP-17. No soil samples were collected below a depth of 5 feet at either sampling location; therefore, the vertical extent of contamination in one likely source area has not been determined.

The Response to Comments presents an assumption that the excavation would have included at least a portion of the sewer line since the excavation was "rather large." Since the location of the excavation is apparently uncertain and the sanitary sewer line may be more than four to five feet below ground surface, the assumption that the sewer line would have been excavated does not appear to be a good assumption. Therefore, it appears that the sewer line, which is a potential source of VOCs, was not investigated and probably was not part of the excavation.

Since the location of the excavation is apparently uncertain, there is no documentation of the use of screening to determine the extent of excavation, confirmation samples were apparently collected from a uniform depth, the vertical extent of contamination is not known in the source area, and the sewer line was not investigated or excavated, it is not possible based on the information presented to assess the effectiveness of the excavation. We request, at a minimum, that the location of the Dry Cleaner Excavation be verified by surveying the corners of the excavation and the sanitary sewer manhole shown on Figure 3 of the July 2003 Northgate report. The outline of the Dry Cleaner Excavation is to be plotted on a revised figure that shows the surveyed location of the Dry Cleaner Excavation, sanitary sewer manhole, outlines of demolished buildings (particularly the walls of the former dry cleaners), outlines of planned buildings, and locations of subsurface utilities. The revised Dry Cleaner Excavation Figure is to be submitted along with a revised Response to Comments. The need for additional investigation or cleanup of the Dry Cleaner area will be evaluated based upon the information presented.

4. **UST Contents and Laboratory Analyses for Soil Samples in the UST Area.** Based on the discussion in the Response to Comments, the history of use and contents of the former UST are apparently not known. The site was not listed as a fuel leak case by ACEH.
5. **Site Grading in Railroad Right-of-way.** Please present the results of the planned stockpile sampling and describe the disposition of surface soils from the railroad right-of-way in the Revised Response to Comments below. The surface soils from the railroad right-of-way should not be mixed with soils from other areas of the site prior to stockpile sampling in order to dilute concentrations of chemicals in soils from the railroad right-of-way.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **September 15, 2006** – Revised Response to Comments with UST Excavation and Dry Cleaner Excavation Figures Showing Surveyed Locations of Excavations

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

Effective **January 31, 2006**, 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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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.

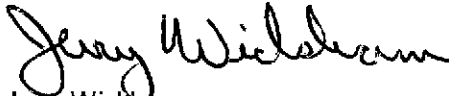
AGENCY OVERSIGHT

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.

Scott Kyman
August 10, 2006
Page 5

If you have any questions, please call me at (510) 567-6791.

Sincerely,

A handwritten signature in black ink that reads "Jerry Wickham". The signature is written in a cursive style with a large, prominent "J" and "W".

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Jung Hwan Jeff Paik, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612-1924

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

To: Jung-Hwan_Paik@URSCorp.com
Cc: Debra_Stott@URSCorp.com; Lois_Autie@URSCorp.com
Subject: RE: BridgeSide Shopping Center Response to Comments Extension Request

Jeff,

Based upon your request, the schedule for submittal of a response to comments for case R02738 is extended to July 14, 2006.

Regards,
Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

-----Original Message-----

From: Jung-Hwan_Paik@URSCorp.com [mailto:Jung-Hwan_Paik@URSCorp.com]
Sent: Tuesday, June 27, 2006 11:08 AM
To: Wickham, Jerry, Env. Health
Cc: Debra_Stott@URSCorp.com; Lois_Autie@URSCorp.com
Subject: BridgeSide Shopping Center Response to Comments Extension Request

Jerry,

This e-mail is a follow-up to our phone conversation from this morning regarding the BridgeSide Shopping Center site. URS would like to request an extension for the response to your Request for Information dated April 27, 2006. The original due date was June 30, 2006. We request an extension until July 14, 2006. Please confirm in a reply e-mail.

Thank you,
Jeff Paik

Jung Hwan Jeff Paik
Environmental Engineer
URS Corporation
1333 Broadway, Suite 800
Oakland, CA 94612
Direct: 510.874.3043
Fax: 510.874.3268
jung-hwan_paik@urscorp.com

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

April 27, 2006

Mr. Scott Kyman
Regency Centers
555 South Flowers Street, Suite 3500
Los Angeles, CA 90071

Subject: SLIC Case N [REDACTED] Bridgeside Shopping Center, 2523-2691 Blanding Avenue,
Alameda, CA

Dear Mr. Kyman:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the report entitled, "Corrective Action Report, Bridgeside Shopping Center, Alameda, California," dated February 13, 2006 and received by ACEH on February 16, 2006. The report was prepared on your behalf by URS Corporation and discusses the results of soil excavation in two areas of the site and soil sampling in the area of a former railroad right-of-way. The Corrective Action Report also includes a request for site closure.

Based upon our review of the case file and the Corrective Action Report, we request additional information prior to making a determination regarding case closure. We request that you address the technical comments below in a Response to Comments and provide the items listed below in the Request for Information **by June 30, 2006**.

REQUEST FOR INFORMATION

ACEH's case files for the subject site only contain the reports entitled, "Corrective Action Report, Bridgeside Shopping Center, Alameda, California," prepared by URS Corporation and dated February 13, 2006 and "Phase II Environmental Investigation, Bridgeside Shopping Center, Alameda, California," Prepared by Northgate and dated July 18, 2003. Several additional reports including unspecified environmental reports prepared in 1987, 1990, and 1995 are referenced in these reports. We request that you submit copies of the reports listed below along with other reports or documents you have documenting additional investigation activities or other environmental work related to this site:

- Phase I Environmental Site Assessment (E2C, April 10, 1995)
- Additional Soil Testing and Preliminary Investigation of Groundwater Quality, Alpha Beta #541, Alameda, California (Kaldveer 1988)
- Letter Recommending that Soils be Excavated and Removed (Kaldveer, August 9, 1990).

TECHNICAL COMMENTS

1. **Previous Site Data.** Analytical data from previous site investigations are not included in the Corrective Action Report. A base map showing sampling locations (not referenced) from the Phase II Environmental Investigation (Northgate, July 18, 2003) is included as Figure 3 but no supporting information is presented. Please describe in the Response to Comments how previous site data were considered in making the recommendations in section nine of the Corrective Action Report.
2. **Other Potential Sources of Hydrocarbons.** The Site History section of the "Phase II Environmental Investigation, Bridgeside Shopping Center, Alameda, California," dated July 18, 2003, contains a reference to a 1988 Kaldveer Associates report that, "cites unconfirmed reports from several sources that waste hydrocarbons may have periodically been dumped on the site." Please provide any additional background information on these unconfirmed reports. Please also describe the suspected location of these releases, if known, and whether the investigations and excavations conducted at the site have addressed these possible releases.
3. **Proposal Dated May 26, 2005.** Section one of the Corrective Action Report indicates that the soil removal was conducted in accordance with a proposal dated May 26, 2005. No proposal or Work Plan is in the ACEH files. Please confirm whether a Work Plan was or was not submitted to ACEH for the corrective action.
4. **Figure 4 in Corrective Action Report.** Figure 4 does not include any site features or reference points for orientation. No analytical data or sampling locations from previous site investigations are shown on the figure to allow a comparison of the limits of the excavation to the extent of contamination identified during previous sampling. Please revise Figure 4 to include analytical data from previous investigations and site features that provide some reference points for the figure. The presentation of all analytical detections on Figure 4 is not necessary; the figure may be simplified to show only TPHg, TPHd, BTEX, and naphthalene for clarity. Please see comment 7 regarding laboratory analyses for soils in the UST area. A 6-inch water main is included in the Legend but not shown on the figure. The revised figure is to be included in the Response to Comments.
5. **Figure 5 in Corrective Action Report.** Please revise Figure 5 to include analytical data from previous investigations and site features that provide some reference points for the figure. Specifically, the locations of the former building walls, floor drain, boiler room, dry cleaning machine, and sewer line are to be shown on the revised figure. Please revise the Legend to indicate the correct units for the VOCs. Table 3 and the laboratory analytical reports in the appendix report the VOC concentrations in mg/kg but the Legend indicates the VOC concentrations are in µg/kg.
6. **Limits of Excavation.** The limits of excavation are shown as a single line on Figures 4 and 5 and the report does not describe the angle of the sidewalls. Please describe in the Response to Comments or show on revised Figures 4 and 5, the configuration of the excavation sidewalls.

7. **UST Contents and Laboratory Analyses for Soil Samples in the UST Area.** The history of use and contents of the former UST are not described in the Corrective Action Plan. Please indicate whether the history of use and contents of the former UST are known. Soil samples from the UST excavation were analyzed for TPHg, TPHd, and full scan VOCs by EPA Method 8260. If the tank history and contents were unknown, please indicate why the Recommended Minimum Verification Analyses for Underground Fuel Tank Leaks for Unknown Fuel or Waste, Used, or Unknown Oil (Water Board, April 16, 2004) were not performed for selected soil samples from the UST Area.
8. **Site Grading in Railroad Right-of-way.** Please expand the discussion of site grading to indicate the final disposition of surface soils in the railroad right-of-way. Please identify the area(s) where these soils were graded, the area(s) where graded soils were moved to, and whether the graded areas are currently covered by pavement or other surfaces. In addition, please describe why the soluble lead present in soil and ballast at concentrations exceeding the soluble limit for hazardous waste does not pose a risk to groundwater.
9. **Site Plans.** Please describe in the Response to Comments, the temporal differences or other reasons why the Site Plan (Figure 2) in Appendix A is significantly different than the Site Plans (Figures 2 and 3) in the Corrective Action Report. Figures 2 and 3 in the Corrective Action Plan appear to be copies of a base map used in the Northgate (July 18, 2003) report but are presented with different orientations and scales. The use of a consistent base map or base maps with temporal labels is preferred.
10. **Geotracker EDF Submittals** - A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data and copies of reports post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency with the requested Response to Comments.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **June 30, 2006** – Response to Comments

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

Effective **January 31, 2006**, 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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

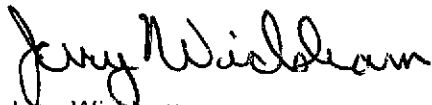
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

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.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Lois Autie, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612-1924

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



December 3, 2004

Scott Kyman
Regency Centers
555 South Flower St.
Los Angeles, CA 90071

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

Subject: Toxics Case RO0002738, Bridgeside Shopping Center, 2523-691 Blanding Avenue, Alameda, California - Request for Funds

Dear Mr. Kyman:

Pursuant to your request for input regarding site investigation and the potential need for mitigation to address volatile organic compounds (VOCs) detected in the site subsurface, Alameda County Environmental Health is submitting this request for funds. Under California Health and Safety Code Sections 25187, 25187.1 and 101480, ACEH has the authority to establish site cleanup goals and to certify cleanup of a contaminated site. In order for ACEH to review reports and oversee environmental work at the site, we require an oversight account for the above-referenced site. To set up your account, please send a check for \$6,000 to Alameda County Environmental Health, attn. Finance Department. Please make your check payable to Alameda County Environmental Health.

This deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized by Section 6.92.040 of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$160.00 per hour.

Please write "Toxics" (the type of project), the site address and AR# 312 477 on your check.

If you have any questions regarding this request, please call Bob Schultz at (510) 567-6719.

Sincerely,


Ariu Levi
Division Chief

cc: Donna Drogos, ACEH
Bob Schultz, ACEH

REGENCY CENTERS
555 South Flower Street, Suite 3500
Los Angeles, CA 90071
213-553-2241

May 12, 2004

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, California 94502-6577

Attention: Ms. Donna Drogos
Supervising Hazardous Materials Specialist

Subject: Request for Report Review and Site Closure Evaluation
Bridgeside Shopping Center
2523 – 2691 Blanding Avenue
Alameda, California
URS Project No. 29403030.00001

Alameda County
MAY 14 2004
Environmental Health

Introduction

This transmittal presents a summary of environmental investigations performed at the Bridgeside Shopping Center in Alameda, California (the "site"). The site consists of an approximate 8.5-acre parcel developed as a neighborhood shopping center. Regency Centers (Regency) and our environmental consultant URS Corporation (URS) are providing this summary and the attached environmental reports for ACEH's review and to solicit an opinion as to the completeness of the investigation to date and any further work necessary to obtain closure for the site. Regency understands that ACEH will coordinate with the Regional Water Quality Control Board in issuing an opinion on the project site status.

The approximately 8.5-acre parcel is developed as a neighborhood shopping center with three single-story buildings that range in size from about 12,300 to 49,980 square feet. Current and former businesses at the site include a grocery store, a drug store, a dry cleaner and laundry, a photo-processing shop, and other small shops. An underground fuel storage tank was reportedly removed from the site during construction of the shopping center in 1974. Regency Centers recently purchased the site. Some of the existing buildings will be demolished, and a new commercial development constructed at the site. Addresses at the site range from 2523 to 2691 Blanding Avenue.

Background

The existing shopping center, originally named the Ferndale Shopping Center, was constructed in 1974. Prior to that time, the site was reportedly occupied by a lumberyard and a concrete batch plant. The site is bordered on the north by a dry dock and boat repair yard and on the east by the Oakland Estuary Tidal Canal. An easement and rail line for the Southern Pacific Transportation Company borders the site on the south.

Northgate Environmental Management, Inc. (Northgate), performed a subsurface investigation of the site, a limited asbestos survey, and conducted portions of a Phase I Environmental Site Assessment. Northgate's findings are presented in the attached report entitled *Phase II Environmental Investigation, Bridgeside Shopping Center, Alameda, California*, dated July 18, 2003. In its review of environmental reports from 1987, 1990, and 1995 and its own investigation, Northgate found that:

- Petroleum hydrocarbons were present in the soil beneath the southeastern portion of the site near the south corner of the grocery store. The presence of petroleum hydrocarbons was attributed to a UST that had reportedly been removed during development of the shopping center in 1974. Previous consultants found total petroleum hydrocarbons in the soils at concentrations up to 1,246 parts per million (ppm). TPH was not detected in groundwater at that time in three monitoring wells that were installed in 1988.
- Because of the former UST, the site was and is listed on the Cortese list for a leaking UST; however the LUST listing is old and the site is not found on current LUST lists. The case is considered closed by the Alameda County Health Services Agency (ACHSA); however no closure letter has been identified.
- A drycleaner operated onsite from 1974 through 1993 or 1995. The drycleaner is listed as a small quantity generator of a hazardous material; however no violations are listed in regulatory agency databases that were reviewed.
- A former onsite film processing business is also listed as a small quantity generator of metallic sludge and inorganic solid waste, also with no violations reported.

Based on Northgate's review of regulatory agency files and prior environmental and geotechnical reports, three areas of potential environmental concern were identified:

- Sitewide Groundwater Quality
- Former Onsite Drycleaning Operations
- Former Onsite Fuel UST

Environmental Investigations

Northgate subsequently collected soil and groundwater samples from 17 direct push borings from depths of up to 16 feet below ground surface (bgs). Northgate also sampled three existing onsite monitoring wells. The results of this subsurface sampling found:

Sitewide Groundwater Impacts

- Groundwater levels ranging from 7 to 13 feet bgs.
- Groundwater samples were collected and analyzed for TPH using EPA 8015 and volatile organic compounds (VOCs) using EPA 8260B from three monitoring wells installed across the site in 1988. The only compound found in groundwater sampled from the three monitoring wells was a very low concentration of MTBE in groundwater from GP-2. Since the former onsite UST was removed in 1974, this constituent is unlikely to be from the onsite UST release.
- Based on these results, the investigation did not indicate the presence of a significant potential for the presence of undiscovered soil or groundwater contamination at the site.

Drycleaner

- Six borings were drilled in the vicinity of the drycleaner; two adjacent to the sewer line, one outside the back door, and three inside the building. Soil samples were collected at depths ranging from 1.5 to 11.5 feet bgs and analyzed for VOCs. Tetrachloroethene (PCE) was detected at a maximum concentration of 130 parts per billion (ppb), cis-1,2-Dichloroethene (1,2-DCE) at a maximum concentration of 7900 ppb, and trichloroethene (TCE) at a maximum concentration of 150 ppb in the soil. Concentrations were highest in the soil samples collected above 5 feet bgs.
- Groundwater samples were also collected from most of the borings in the vicinity of the drycleaner and also analyzed for VOCs. The data indicate the presence of VOCs in groundwater beneath the drycleaner and adjacent to the sewer line. The maximum concentrations detected in groundwater were cis-1,2 DCE at 510 ppb, PCE at 1.7 ppb, and TCE at 37 ppb.

- The concentrations of VOCs measured in soil and groundwater at this location do not appear to represent a significant environmental concern.

Former UST

- The evaluation of the former UST area involved drilling five borings around the south corner of the grocery building and two borings inside the building to help define the lateral and vertical extent of impacted soil. Soil samples were collected from 7.5 and 11 feet bgs and analyzed for TPH, BTEX, and MTBE. TPH as gasoline was detected at a maximum concentration of 1,120 ppm, toluene was detected at a maximum concentration of 1,300 ppb, ethylbenzene was detected at a maximum concentration of 7,400 ppb, and xylenes were detected at a maximum concentration of 3,700 ppb.
- Groundwater samples were also collected from most of the borings near the former UST area and also analyzed for TPH, BTEX and MTBE. TPH as gasoline was detected at a maximum concentration of 3.13 ppm, benzene was detected at a maximum concentration of 6.3 ppb, toluene was detected at a maximum concentration of 3.4 ppb, ethylbenzene was detected at a maximum concentration of 45 ppb, and xylenes were detected at a maximum concentration of 6.4 ppb. One groundwater sample was also analyzed for VOCs with concentrations of 1,3,5-trimethylbenzene (7.5 ppb), isopropyl benzene (9.4 ppb), naphthalene (57 ppb), and n-propylbenzene (17 ppb) detected. The extent of impact in the former UST location has been delineated.
- Although the concentrations of gasoline hydrocarbons measured in soil and groundwater in the vicinity of the former UST locally exceed certain RBSLs or the primary drinking water standards, the general area of impact appears to be relatively limited. In addition, hydrocarbons do not appear to be migrating to the Oakland Estuary Tidal Canal.

Recommendations

Based on the results of the soil and groundwater investigations conducted by Northgate, URS has already recommended to Regency Centers that the identified contaminated soil encountered during redevelopment of the site be excavated and removed from the site. None of the sources that supposedly created the impacted soils remain in operation, and in fact, have not operated onsite for at least eight years. It is also Regency's and URS' opinion that based on the results of the investigations performed to date and the type of development, that groundwater remediation is not necessary.

ACEH
Bridgeside Shopping Center
May 12, 2004
Page 5 of 5

Thank you for the time and consideration paid to this project. We look forward to your response.

Sincerely,

REGENCY CENTERS



Mr. Scott Kyman
Senior Financial Analyst
213-553-2241

URS Corporation



Ms. Debra B. Stott, R.G.
Principal Geologist
213-996-2441

DELETE 04/08

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R02738
AWJ

AC-8
GSZ

FFKR

Architects/Planners II

132 Pierpont Avenue
Suite 200
Salt Lake City, Utah
84101
Tel 801 521-6186

Consulting Founder
Robert A. Fowler, AIA

Principals
Franklin T. Ferguson, FAIA
M. Ray Kingston, AIA
Edward Joe Ruben, AIA
Kenneth E. Linder, AIA
Kip K. Harris, AIA
M. Louis Ulrich, AIA
Christopher R. Nelson, AIA
Jeffrey L. Fisher, AIA

December 23, 1987

Ms. Robin Bruer
California Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6000
Oakland, California 94607

Re: Alpha Beta Store #541
Alameda, California
Project No. 8755

CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
DEC 28 1987
ff RMB

Received
12-28-87
RMB

Dear Robin:

We are an Architectural Firm in Salt Lake City, Utah doing an expansion of an existing business located northeast of the intersection of Blanding Avenue and Broadway in the City of Alameda. After completing a foundation investigation and a soils testing program, it has come to our attention that there is a high content of petroleum hydrocarbons in a small area of our site. Our client has secured further testing to determine the extent of the hydrocarbons and whether the ground water has indeed been contaminated. We hope to receive this report around the first of the year.

Alameda

Enclosed is a copy of the Preliminary Soil Testing Program completed by Kaldveer Associates.

We would request a copy of "Guidelines for Addressing Fuel Leaks" so we can become aware of some possible options for remediation.

Sent copy
12-28-87
RMB

Please call if you have any questions.

Thank you,

David Giles

David Giles, Project Manager
FFKR Architects/Planners II

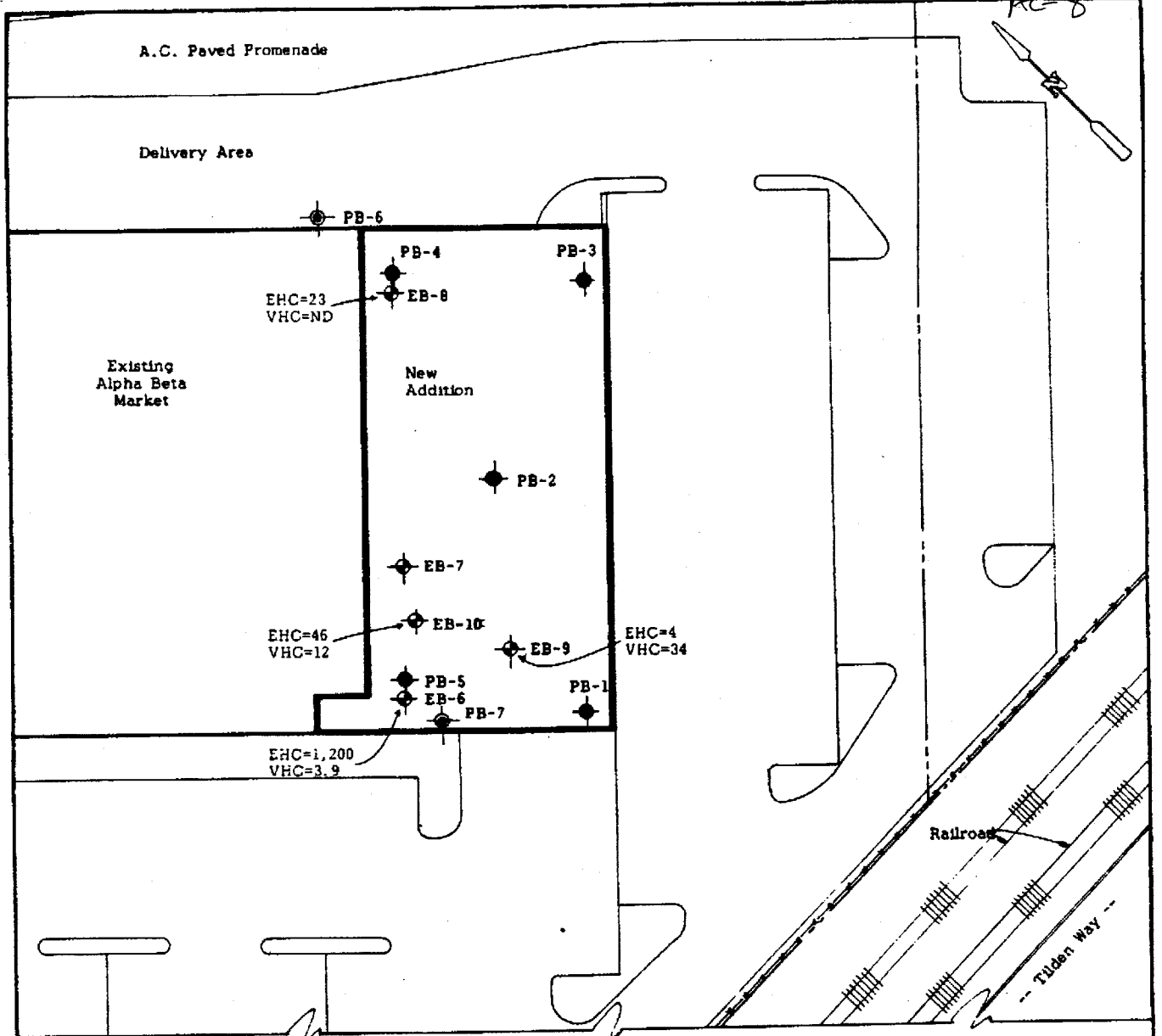
B3
GSZ

DG/dy

2/18/88

cc: Gordon Powers
Ronald Bajuniemi
Nic Dempsey
Jeff Fisher

* Date corresponds to date "Leak Discovery," "Leak Reported," & "Leak stopped"
of 12/28/1987



LEGEND

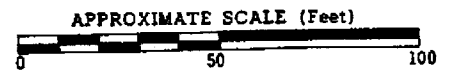
- EB-10 Approximate Location of Exploratory Borings
- PB-5 Approximate Location of Previous Borings drilled on October, 1987.
- PB-7 Approximate Location of Previous Borings drilled on April, 1972.

EHC — Total Concentrations of Extractable Hydrocarbons in ppm

VHC — Total Concentrations of Volatile Hydrocarbons in ppm

ND — Not Detected Above Detection Limits

Base: "Site Plan", by James W. Foug & Associates, dated November 26, 1987.



Kaldveer Associates
Geoscience Consultants
A California Corporation

SITE PLAN

ALPHA BETA #541 ADDITION
Alameda, California

PROJECT NO.

KE998-1

DATE

December 1987

Figure 1

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200 Oakland, CA 94621 (415) 271-4320

Hazardous Materials Division Inspection Form

Make Copy for Operator

Site ID# 1277 Site Name Classic Cleaners Today's Date 11/21/93
Site Address 2631 Blanding Ave. EPA ID# CAP 982 414921
City Alameda Zip 94501 Phone 814-9100

MAX Amt. Stored > 500lbs/55g/200cf? Hazardous Waste generated per month? Y N

- Inspection Categories:
[X] I. Haz. Mat/Waste GENERATOR/TRANSPORTER
[] II. Business Plans, Acute Hazardous Materials
[] III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Table with columns for violation categories (LA GENERATOR, LB TRANSPORTER) and codes (1-41). Includes sub-sections for Manifest, Misc., Prevention, Conflic. gency, Containers, Tanks, and Manifest/Conflic's.

Comments:

"Peric" is used in their dry cleaning operation. Waste "peric" is stored in 2-15 gal drums. Last disposal of "peric" waste was on 10-29-93 by Safety Clean.

Rev 6/88

Contact:
Title:
Signature: [Signature]

Inspector: [Signature] Don Arkinson-Adams
Signature: [Signature]