

ALTA BUILDING MATERIAL COMPANY

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Alameda County
Environmental Health

October 30, 2007

Mr. Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health Department
Division of Environmental Protection
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 93402

Attached with this letter, is the proposal of a "Work Plan" as related to the ongoing Soil and Groundwater Investigation at our address of 745 50th Avenue, Oakland, CA (SLIC Case No. RO0002746). This work plan was prepared by LFR Environmental Management & Consulting Engineering at our request.

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.

Sincerely,

Jack Krause
Alta Properties, LLC

October 30, 2007

002-11134-00

Mr. Jerry Wickman, P.G.
Hazardous Materials Specialist
Alameda County Environmental Health Department
Division of Environmental Protection
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 93402

Subject: Workplan for Assessment of Dichlorobenzene in Soil and Groundwater,
Former AAA Equipment Company Property, 745 50th Street, Oakland, California
(SLIC Case No. RO0002746 Geotracker Global ID SL0600186350)
and Learner Investment Company Property, 768 46th Avenue, Oakland, California
(SLIC Case No. RO0002478 Geotracker Global ID SLT20150156)

Dear Mr. Wickman:

LFR Inc. (LFR) is pleased to submit to the Alameda County Environmental Health Department (ACEH) this workplan for the assessment of dichlorobenzene (DCB) in soil and groundwater (“the Workplan”) at the former AAA Equipment Company property located at 745 50th Street, Oakland, California, and the Learner Investment Company property located at 768 46th Avenue, Oakland, California. This Workplan is being submitted in response to the letter dated July 11, 2007 from the ACEH to Alta Properties, LLC (the current owner of the former AAA Equipment Company property, henceforth referred to as “the Alta Property”) and Richard Neu (the current owner of the Learner Investment Company property, henceforth referred to as “the Learner Property”). This Workplan was prepared on behalf of both the Alta and Neu parties, whose properties have adjacent property lines (Figure 1). The Site referred to in this Workplan encompasses both the Alta and Learner Properties.

The ACEH’s letter of July 11, 2007 indicated that petroleum hydrocarbons and volatile organic compounds (VOCs), including DCB (this term will be used in this Workplan to include chlorobenzene [CB], 1,2-dichlorobenzene [1,2-DCB], 1,3-dichlorobenzene [1,3-DCB], and 1,4-dichlorobenzene [1,4-DCB]), had been detected in groundwater samples collected from monitoring wells on the adjacent Pacific Gas and Electric Company (PG&E) property, which is located in a downgradient direction from the Site (Figure 2). The letter further indicates that DCBs have been detected in soil and groundwater at the Site and at the former Superior Plaster Casting property (“the Superior Property”) located adjacent to the Site (Figure 2). The letter suggests that there is a single plume of DCB-impacted groundwater from a common source of historic releases that occurred on each of the four properties. The objective of this Workplan is to further characterize the extent of DCB in both soil and groundwater on the Site, and if possible provide data to help understand the source area for the DCBs in groundwater.



Background

Historical Property Uses

Alta Property (former AAA Equipment Company Property)

Based on LFR's historical research, the Alta Property was vacant in 1925, with the exception of two residences (addressed as 755 and 765 50th Street, respectively) located on that portion of the property that borders 50th Street. By 1939, the Independent Construction Company began operation on the back portion of the property. By 1950, the Independent Construction Company was operating an asphalt batch plant on the property, which included the use of two belowground storage vessels made of steel sides and concrete bottoms. The vessels were used to store petroleum product that was used in the making of asphalt. Apparently product was shipped by rail car on rail tracks located approximately 80 feet to the west of the vessels and transferred to the vessels via underground pipelines. The vessels were removed by Alta in September and October 2003, and a report of the removal activities was prepared by LFR (formerly LFR Levine·Fricke) and submitted to the ACEH on April 27, 2004. Closure of the tank removal activities is still pending.

By 1961, Independent Construction Company still occupied the property addressed as 741 50th Street (the residences were no longer present); however, the asphalt batch plant was no longer present. Between 1961 and 1969, records show that Independent Construction Company's use of the property included the storage of equipment, sand blasting, and a paint shop with a pipe painting operation. The city directories researched indicated that AJ McCosker Company office and yard was listed at 741 50th Street in 1955, and West Coast Painting Contractor was listed at that address in 1962. It is believed that these companies may have been subsidiary companies to Independent Construction Company or co-located at the property. It is also believed that operations under these company names were similar to those described above.

By 1967, AAA Equipment Company occupied the property; they conducted operations there until 2002, when Alta purchased the property. There is very little information about the AAA Equipment Company operations other than those observed at the time Alta purchased the property. AAA Equipment Company operated as a "junkyard" and is believed to have acquired old automobiles and other machinery for resale of the parts. There were many racks of used automobile and machinery parts (mostly if not all made of metal) located across the property in 2002. Several 55-gallon drums that held used machinery parts were also located throughout the property.

At the time Alta took ownership of the property, AAA Equipment had removed all the parts, racks, and drums from the site. Alta has since regraded the property, covered the entire property with concrete, built two new buildings, and refurbished and expanded an existing building. The site is currently used as a building materials supply yard. Building materials are stored there prior to loading onto trucks for delivery to construction sites.



Learner Property

Based on LFR's historical research, the Learner Property was vacant in 1925. By 1939, it appears that a scrap metals yard had begun operations. By 1956, the Learner Company was operating a scrap metal yard that included an office building, scales, a hydraulic press, and a storage building. This operation continued through the mid 1990s. The property has not been in use since the scrap metal yard ceased operations.

Prior investigations conducted in the vicinity of the scrap metal operational features have detected elevated levels of metals in soil. These operations occurred several hundred feet from the boundary of the Learner Property and the Atlas Property. ACEH has requested a workplan to further characterize the extent of metals impacts on the Learner Property. The metals impacts on the Learner Property is considered to be a separate issue from the DCB issue for the subject Site, and a separate workplan to address the metals impacts on the Learner Property will be provided under separate cover.

Geology and Hydrogeology

The Site is located just north of the San Leandro Bay inlet of San Francisco Bay, and is underlain by Bay Mud and fluvial deposits. According to Woodward-Clyde Consultants (WWC), the Bay Mud ranges in thickness from less than 1 foot to more than 120 feet and is characterized by its saturation with salt water and low permeability.

The groundwater quality has been described as brackish and of no practical use. The first 6 feet of soils beneath the site include fining layers of gravel, sand, silt, and clay, according to a Dames & Moore description documented during test pit excavations in 1988. Based on previous investigations on neighboring properties, depth to groundwater in the site vicinity is 7 to 8 feet below ground surface (bgs), and the groundwater flow direction is to the southwest.

Prior Environmental Investigations

Several prior environmental investigations have been conducted on the Site and on neighboring properties. LFR conducted an agency file review of the ACEH file, and the information provided in this section is based on reports currently on file with the agency. As many of the prior investigations focused on total petroleum hydrocarbons (TPH) and/or metals, a lot of the prior samples collected were not analyzed for VOCs. Only the investigations and analytical results that include VOCs are included in the discussion below.

Figure 3 provides a relationship of the subject Site to the neighboring properties of concern, and includes plotting of borings and well locations of interest. Figure 4 provides an expanded scale and centers on the area of the Site and the Superior Property where DCBs have been detected in soil or groundwater.



Alta Property (former AAA Equipment Company Property)

Environmental Investigation (Revised) 745 50th Avenue, Oakland, CA, by Harding ESE, May 30, 2002

Prior to purchasing the property, Westside Building Materials Corporation (the parent company of Alta) contracted with Harding ESE to conduct a subsurface investigation at the Alta Property. The program included the collection of 24 soil samples and 5 groundwater samples from 12 borings. The boring locations are shown on Figure 3. All samples were analyzed for total petroleum hydrocarbons as diesel (TPHd) and VOCs; selected samples were also analyzed for semivolatile organic compounds (SVOCs) and metals. Borings B-2, B-3, B-11, and B-12 were in the northern portion of the property. The DCB results for the analysis of soil and groundwater samples collected from these borings are presented on Figures 5 and 6, respectively. DCB was only detected in one groundwater sample collected from Boring B-2 (located near the western edge of the property) at concentrations of 4.8 micrograms/liter ($\mu\text{g/l}$) of 1,4-DCB and 2.0 $\mu\text{g/l}$ of 1,3-DCB.

Underground Storage Tank Removal Report, Former AAA Equipment Company Site, 745 50th Avenue, Oakland, California, by LFR, April 27, 2004

Two steel structures with concrete bottoms were discovered during the development of the Alta Property and a portion of the Learner Property referred to as the Flag Lot (developed as part of the Alta Property through a lease agreement). These structures were removed under the underground storage tank (UST) regulations in September and October 2003 (Figure 4). The USTs were part of the prior asphalt batch plant. The northernmost UST was the larger of the two and has been referred to as "the Large UST" and numbered as UST-L. The other UST has been referred to as "the Small UST" and numbered as UST-S. The soil in and around the USTs was impacted with various petroleum hydrocarbons. Approximately 2,960 tons of hydrocarbon-affected soil was excavated from around and under the USTs and adjoining areas and disposed of offsite in a permitted landfill. Figure 4 shows the approximate locations of the UST excavations, and the approximate extent and depth of the adjoining areas around the UST excavations where soil was removed. Several soil samples collected from the material in the USTs and the adjoining soil areas were analyzed for VOCs. The approximate locations and laboratory analytical results of those samples are shown on Figure 5.

After the UST excavations were completed, the depth of the excavations extended below the water table. Groundwater collected in the excavation pits, and free hydrocarbon product was observed on the water. Water was pumped from the pits until the free hydrocarbon product no longer appeared and to dewater the pits for backfill. A total of approximately 65,000 gallons of water was pumped from the tank pits and disposed of offsite. After the pumping was completed, a sample of the groundwater from each pit was collected and analyzed for VOCs. Analytical results are shown on Figure 6. DCB was not detected in the groundwater sample collected from the pit for UST-L. Groundwater analytical results for the sample collected from the pit for UST-S indicated 1,4-DCB,



1,3-DCB, 1,2-DCB, and CB were detected at concentrations of 360 $\mu\text{g/l}$, 210 $\mu\text{g/l}$, 24 $\mu\text{g/l}$, and 74 $\mu\text{g/l}$, respectively.

Learner Property

Previous investigations conducted for the owners of the Learner Property focused on prior site activities involving the scrap metal yard. Sampling and analysis focused on TPH and metals impacts. No analysis for VOCs was found. A workplan to further characterize those metals impacts will be prepared under separate cover.

As one of the USTs discovered during the development of the Alta Property was partially located on the Learner Property, soil samples were collected from the Learner Property as part of that program and analyzed for VOCs. That program is discussed above, and the DCB results from the soil samples are presented on Figure 5.

Superior Plaster Castings Property

Report on Phase II Site Assessment, Superior Plaster Castings, 4800 Coliseum Way, Oakland, California, by Simon-EEI, Inc., May 1991

This program focused on TPH and metals in soil and groundwater. No analyses for VOCs were included.

Report on Supplemental Phase II Site Assessment, Superior Plaster Castings, 4800 Coliseum Way, Oakland, California, by Simon-EEI, Inc., June 1991

This program focused on TPH and metals in soil and groundwater. No analyses for VOCs were included.

Limited Subsurface Soil Chemistry Analysis, 4800 Coliseum Way, Oakland, California, by Earth Metrics Inc., May 8, 1992

This program focused on TPH and metals in soil and groundwater. No analyses for VOCs were included.

Limited Phase II Site Assessment, 4800 Coliseum Way, Oakland, California, by Woodward-Clyde Consultants, March 24, 1993

This program included the collection of soil and groundwater samples that were analyzed for TPH, metals, and VOCs. The soil samples that were analyzed for VOCs were collected from two different borings. One boring was located north of the building on the property and approximately midway between the eastern and western property lines. VOCs were not detected in that soil sample. The other boring was located between the building on the Superior Property and the



boundary with the Learner Property, in an area where an old rail line existed. This boring was converted to a groundwater monitoring well (WCC-1A; Figure 4) and a groundwater sample (the only one collected as part of this program) was collected from this well. 1,3-DCB and 1,4-DCB were detected in the soil sample from this location at concentrations of 2.0 micrograms per kilogram ($\mu\text{g}/\text{kg}$) and 4.8 $\mu\text{g}/\text{kg}$, respectively (Figure 5). CB, 1,2-DCB, 1,3-DCB, and 1,4-DCB were detected in the groundwater sample from well WCC-1A at concentrations of 270 $\mu\text{g}/\text{l}$, 290 $\mu\text{g}/\text{l}$, 1,400 $\mu\text{g}/\text{l}$, and 1,500 $\mu\text{g}/\text{l}$, respectively (Figure 6).

Phase II Environmental Site Investigation Report, Metalcast Engineering Facility, 4800 Coliseum Way, Oakland, California, by ATC Associates Inc., November 24, 1998

This program included drilling nine borings between the building on the Superior Property and the property line with the Learner and Alta Properties (Figure 4), an area where an old rail line was located. One soil sample and one groundwater sample were collected from each boring, and one groundwater sample was collected from monitoring well WCC-1A. Each soil and groundwater sample was analyzed for VOCs. 1,4-DCB concentrations in soil ranged from non-detect (ND) to 33,000 $\mu\text{g}/\text{kg}$, with the highest concentration detected in the sample collected from boring ATC-3 at a depth of 3 feet bgs. 1,4-DCB concentrations in groundwater ranged from ND to 1,500 $\mu\text{g}/\text{l}$, with the highest concentration detected in the sample collected from WCC-1A. Soil and groundwater analytical results for DCBs are presented on Figures 5 and 6, respectively.

Soil Remediation, 4800 Coliseum Way, Oakland, California, by ERAS Environmental, Inc., June 26, 2000

This program included the excavation of DCB-impacted soil in the vicinity of ATC boring ATC-3 (Figure 4). The excavation was approximately 23 feet long, 3 to 6 feet wide, and 4.5 feet deep. The excavated soil was transported offsite for disposal. Confirmation soil samples were collected at various locations within the excavated area. DCB analytical results of the confirmation soil samples are shown on Figure 5.

PG&E Property

Semiannual Groundwater Monitoring report, April 2007 Sampling Event, Pacific Gas and Electric Company, Oakland General Construction Yard, 4930 Coliseum Way, Oakland, California, by Innovative Technical Solutions, Inc., May 2007

PG&E has conducted groundwater monitoring and collected samples from a groundwater monitoring well network on their property (Figure 3) from approximately April 1989 to the present. The results of this groundwater monitoring and sampling program are included in the above-referenced report ("ITS Report"). The groundwater flow direction predicted in the ITS Report is from north to south, with some variation in flow direction in the northern corner of the PG&E property. This flow direction is toward the San Leandro Bay, which is located



approximately 2,700 feet south southwest of the Site. It is reasonable to assume that this groundwater flow direction is consistent at the Superior Property and the Site.

DCB data for groundwater samples collected from the PG&E wells in December 1998 are plotted on Figure 6 for comparison purposes. Data from this timeframe were plotted because the samples were collected on a date as close as possible to the date that groundwater samples were collected from the Superior Property. The equal concentration contours plotted on Figure 6 are therefore an approximation of the conditions that existed in 1998. These contours do not include the elevated detection of DCBs in the sample collected from the UST-S excavation pit in 2003, as it is believed this result was influenced by the pumping of 65,000 gallons of water from the tank pits prior to collection of the sample.

Workplan

Pre-Field Activities

Prior to commencement of field activities, LFR will coordinate field activities with the Site operator and notify the ACEH.

LFR will prepare a site-specific Health and Safety Plan (HSP) for all LFR personnel and subcontractors, in accordance with applicable federal and state regulations (29 Code of Federal Regulations [CFR] 1910.120 and 8 California Code of Regulations [CCR] 5192, respectively) that will be reviewed and approved by an LFR Certified Health Professional. The HSP will address the potential for exposure to hazardous constituents, and delineate the general safety procedures required for the safe operation of mechanical equipment to be used while conducting field operations at the Site. All proposed sampling locations will be marked as required by Underground Service Alert (USA). LFR will contact USA at least three days before commencement of the field work to obtain a utility clearance ticket number. LFR may also subcontract with a subsurface utility locator to screen the proposed sampling locations.

Soil and Groundwater Investigation

Using a direct-push drilling rig, a total of six borings (DCB-P1 through DCB-P6) will be advanced to approximately 8 feet bgs. LFR's proposed boring locations are shown on Figure 7. Soil samples will be collected from these borings at a depth of 4 feet bgs. All soil samples will be analyzed by a state-certified laboratory for VOCs using EPA Method 8260. The soil samples from borings DCB-P1 through DCB-P4 will also be analyzed for Title 22/California Assessment Manual (CAM) 17 metals using EPA Methods 6010/7470.

Groundwater is anticipated to be encountered at a depth of approximately 6 feet bgs. Upon reaching groundwater, a groundwater sample will be collected from each of the six boreholes by either the hydropunch method or by installing a temporary well. If a temporary well is installed, a



polyvinyl chloride (PVC) casing will be lowered into the borehole, then a bailer will be lowered into the well and a groundwater sample will be collected.

The groundwater samples collected from each of the boreholes will be analyzed by a state-certified laboratory for VOCs using EPA Method 8260. In addition, the four samples collected from boreholes DCB-P1 through DCB-P4 will be analyzed for Title 22/CAM 17 metals.

To reduce the potential for cross contamination between borings, downhole drilling tools and sampling equipment will be cleaned prior to use at each drilling location. The samples will be properly sealed, labeled, and placed in a cooled chest for chain-of-custody transport to a fixed laboratory for analysis. The four groundwater samples collected for metals analysis from boreholes DCB-P1 through DCB-P4 will be filtered at the laboratory prior to analysis.

If laboratory results indicate the presence of any metals concentrations in soil exceeding ten times their respective soluble threshold limit concentration (STLC), then a waste extraction test (WET) will be performed.

Soil cuttings and any other derived wastes will be containerized in 55-gallon drums and temporarily stored onsite pending receipt of laboratory analytical results. The contents of the drums will be disposed of at an approved disposal facility.

Reporting

LFR will submit a report to the ACEH summarizing the investigation and presenting the laboratory analytical results. All work will be performed under the supervision of an LFR California registered Professional Geologist, who will sign the report.

If you have any questions, please contact either of the undersigned at (714) 444-0111.

Sincerely,

Thomas S. Chandler
Principal Engineer

Tony Marino, P.G.
Senior Associate Geologist
California Professional Geologist No. 8304

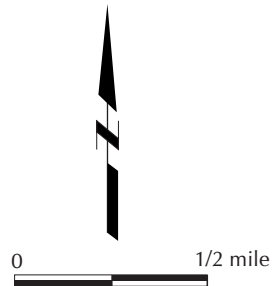
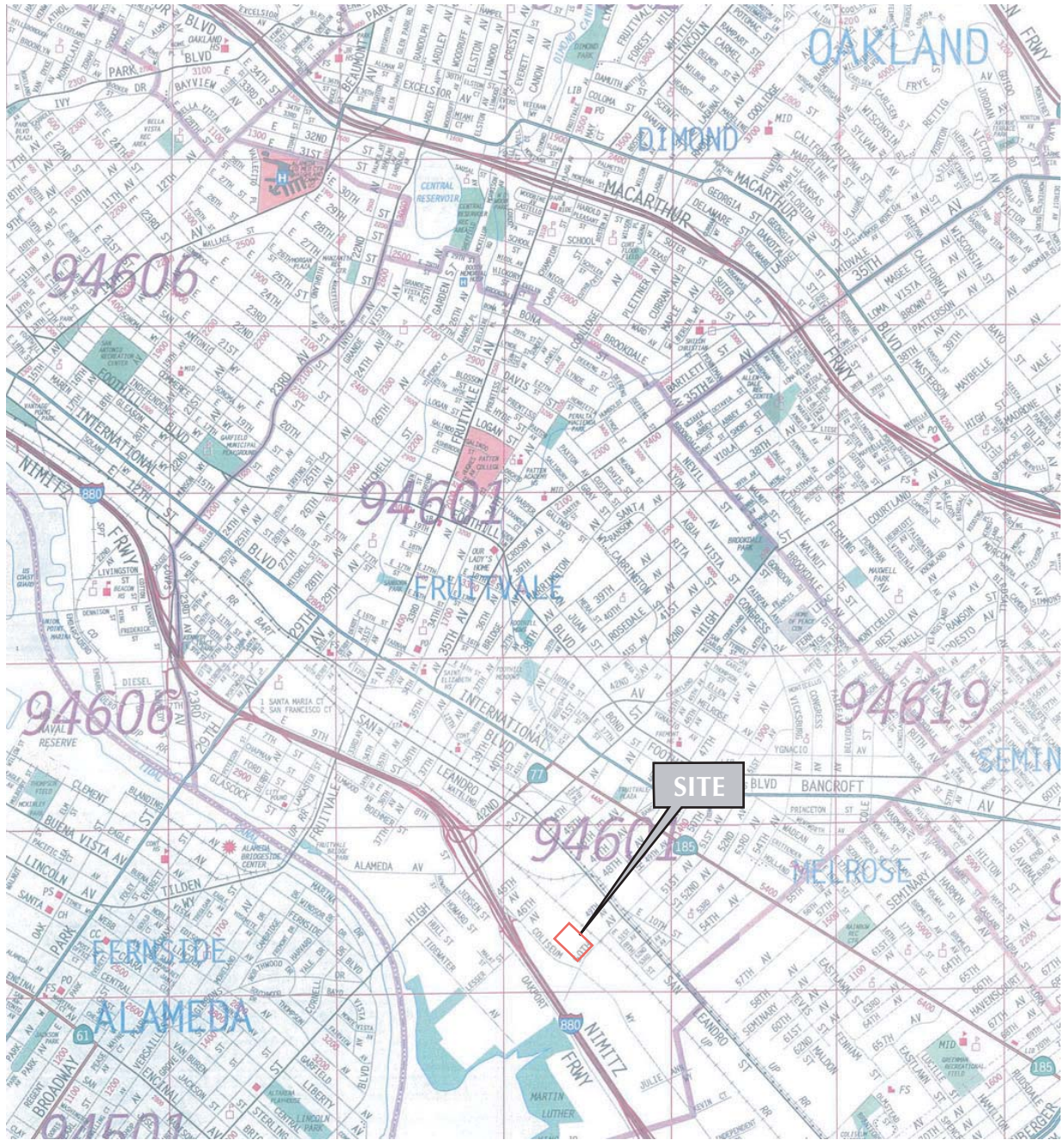


cc: Dick Peckham – Westside Building Materials Corporation
Jack Krause – Westside Building Materials Corporation
Marcella Harrison – GVA Kidder Mathews



Attachments

FIGURES



Site Location Map

745 50th Avenue, Oakland, CA – 002-11134-00



Figure 1

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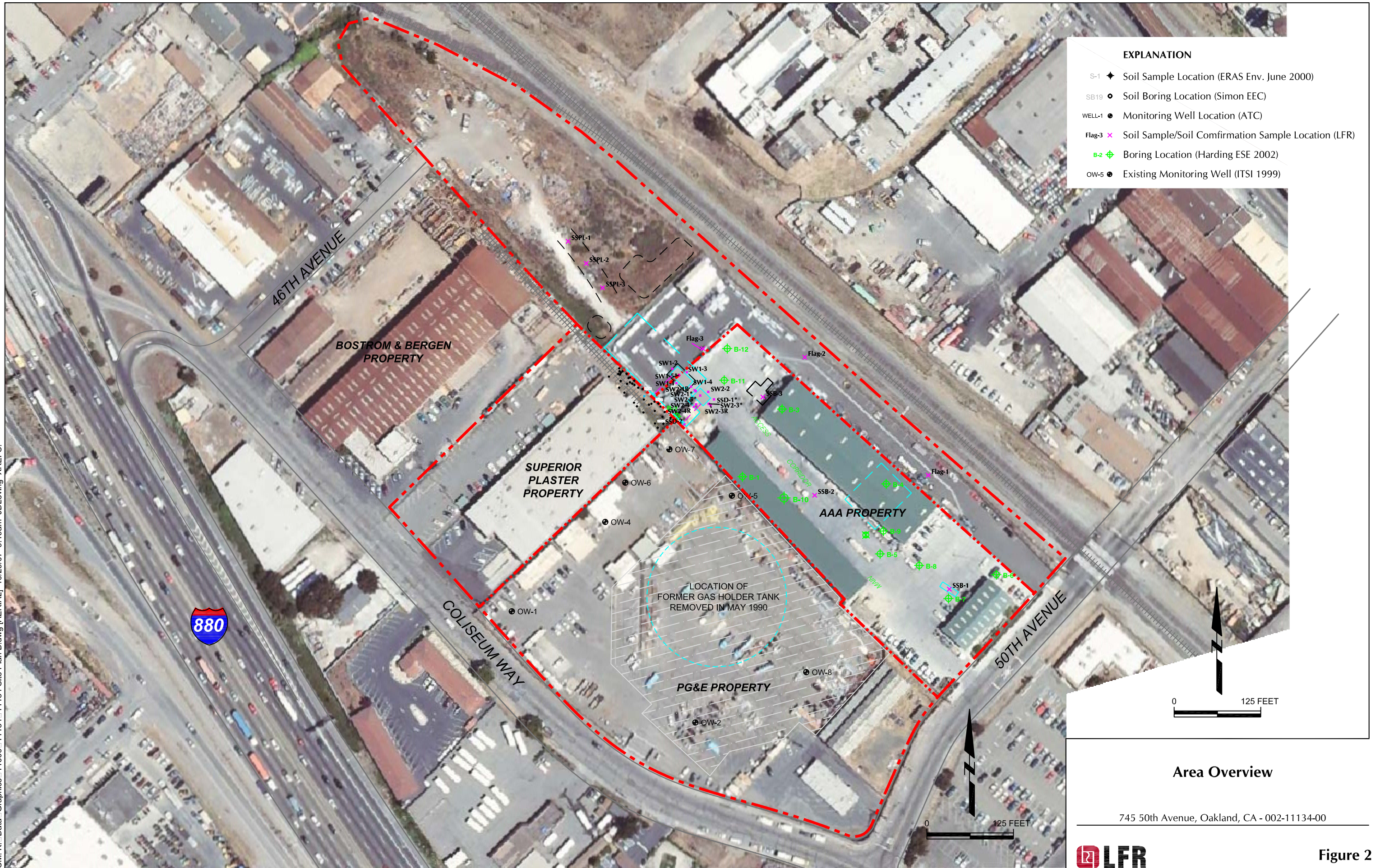
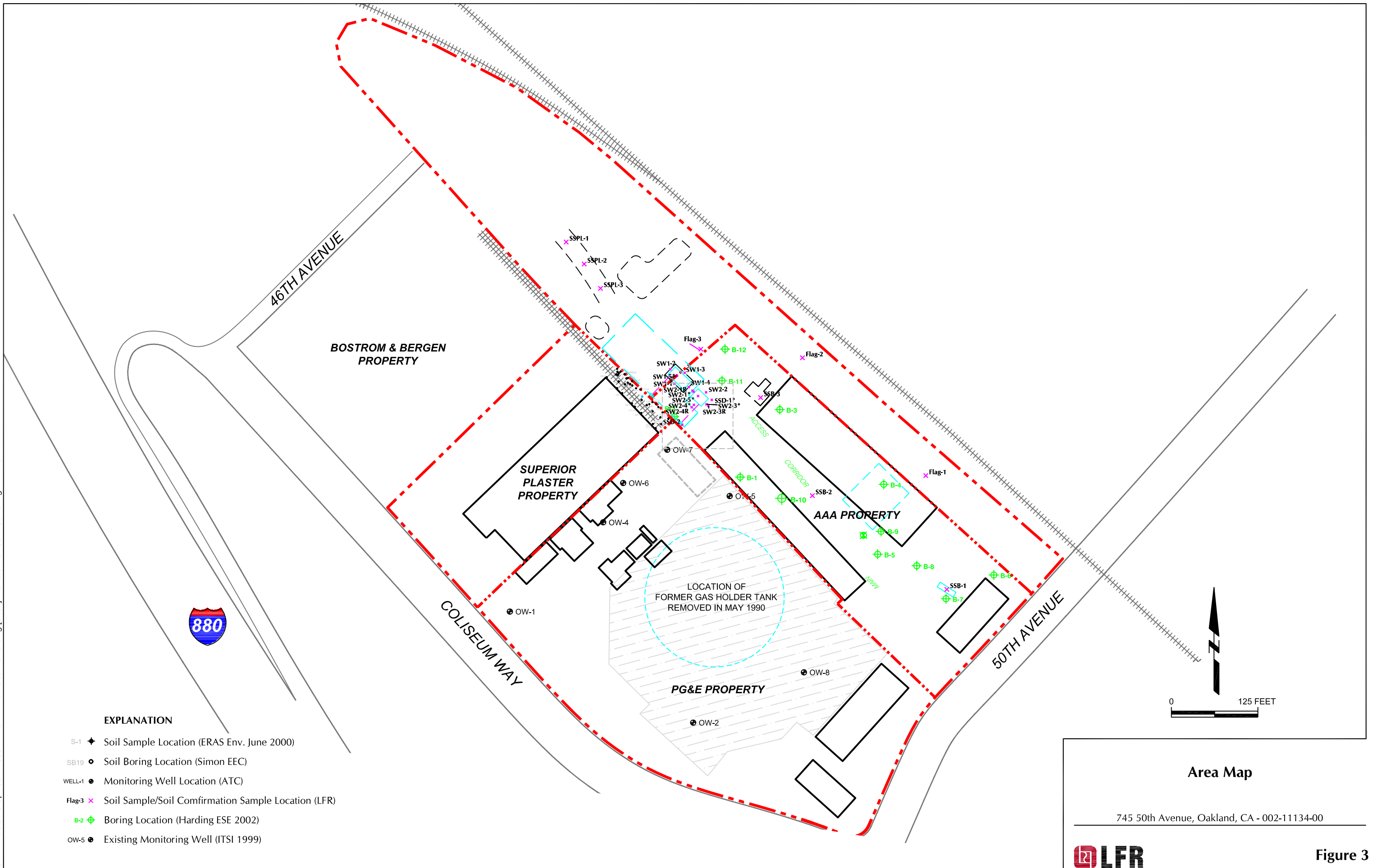
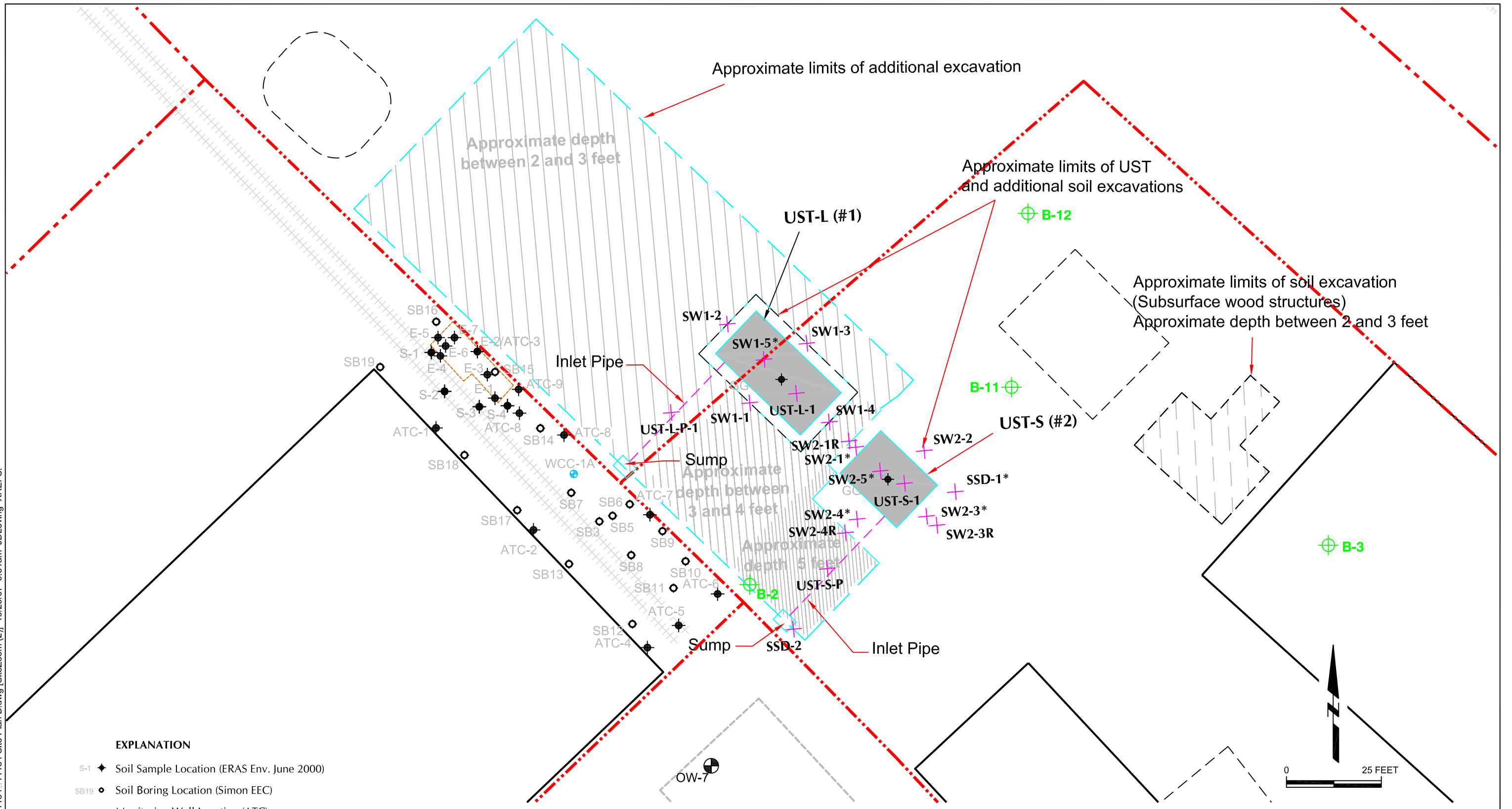


Figure 2



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EXPLANATION

- S-1 ◆ Soil Sample Location (ERAS Env. June 2000)
- SB19 ● Soil Boring Location (Simon EEC)
- WELL-1 ● Monitoring Well Location (ATC)
- Flag-3 ✕ Soil Sample/Soil Confirmation Sample Location (LFR)
- B-2 ⊕ Boring Location (Harding ESE 2002)
- OW-5 ● Existing Monitoring Well (ITSI 1999)
- Excavated Soil Limits (ERAS Env. June 2000)
- - - Tank Pit Excavation (LFR, September 2003)
- Excavated Soil Limits (LFR, September 2003)

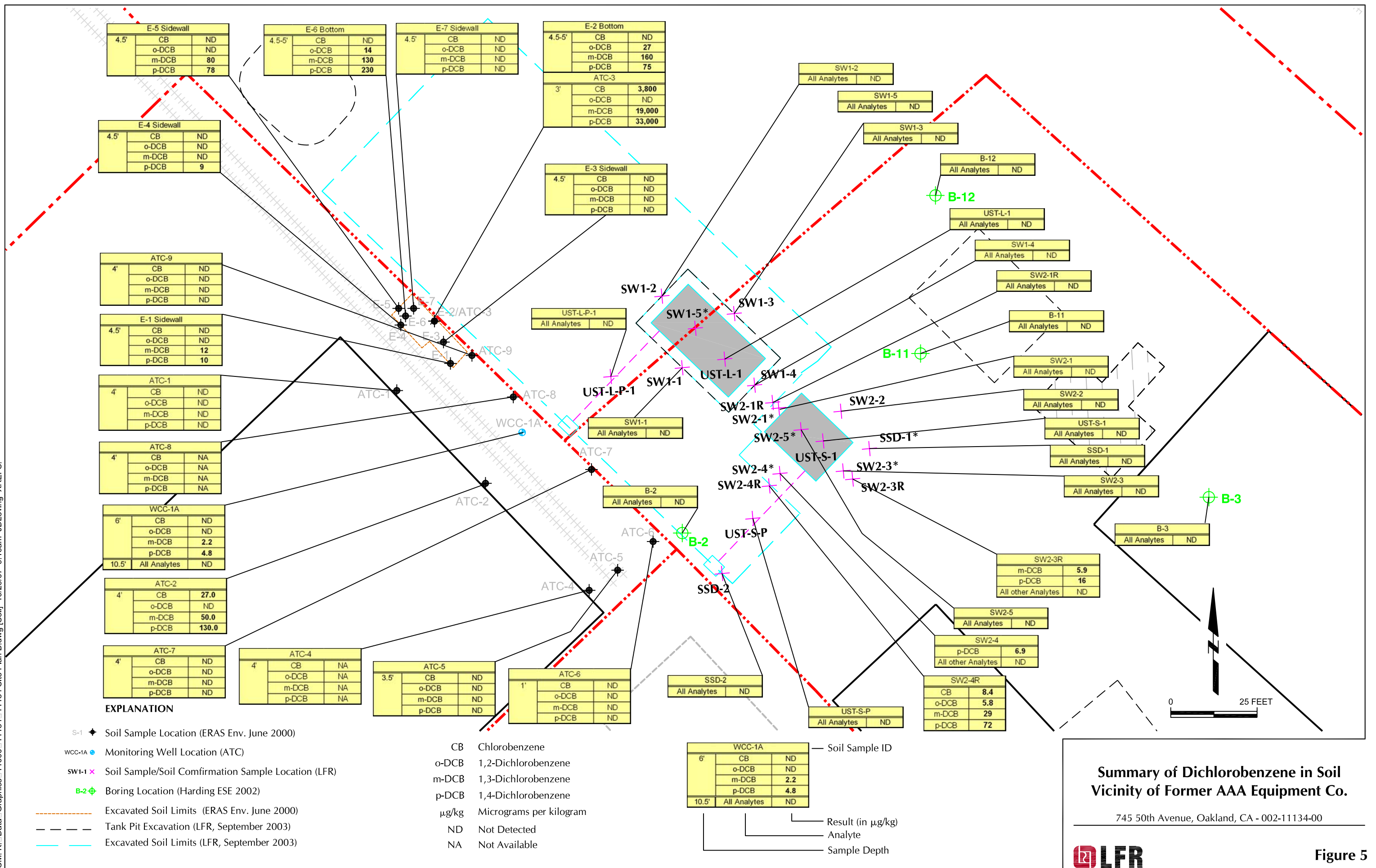
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Area Detail Map

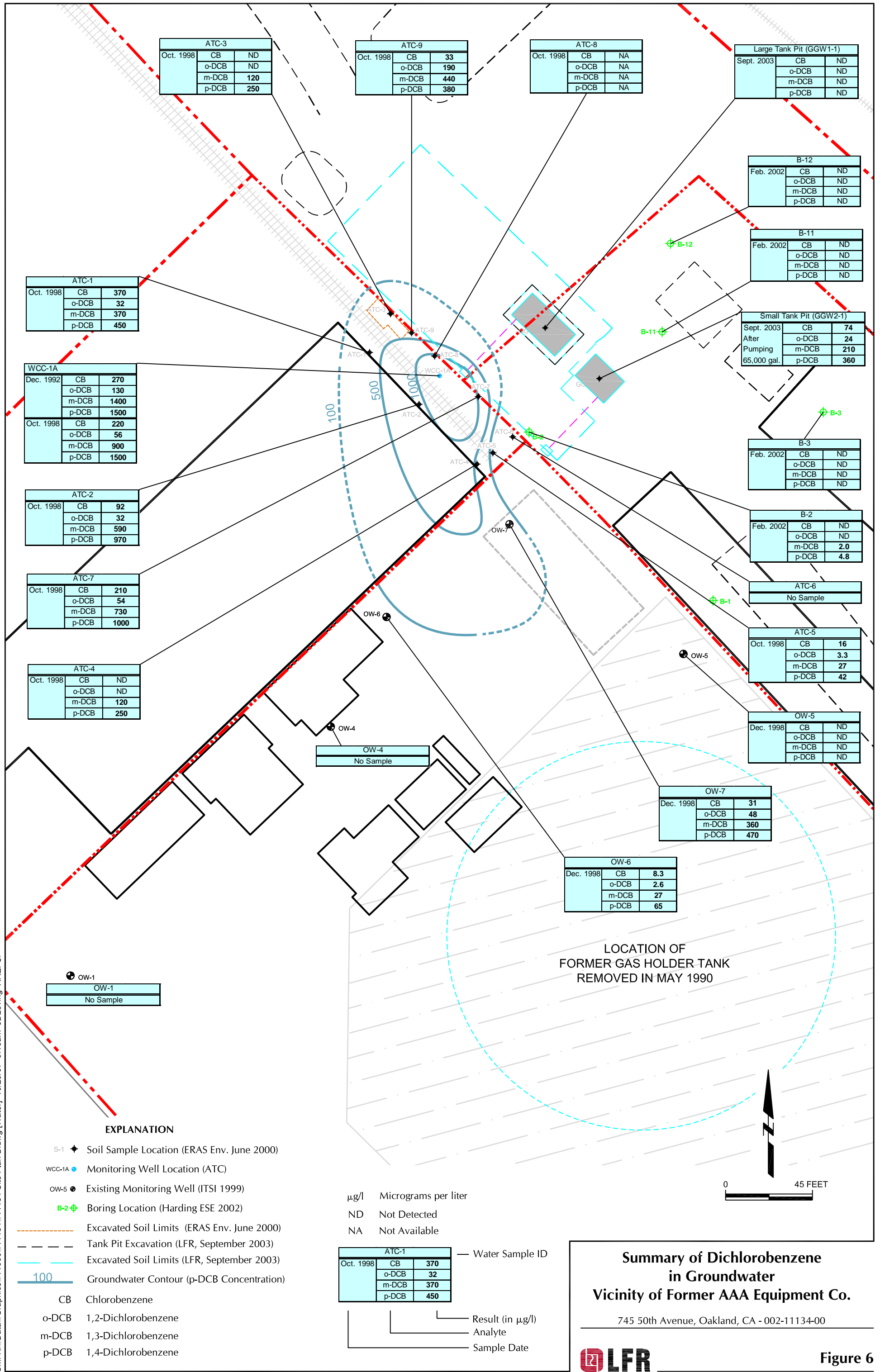
745 50th Avenue, Oakland, CA - 002-11134-00



Figure 4



Summary of Dichlorobenzene in Soil Vicinity of Former AAA Equipment Co.
 745 50th Avenue, Oakland, CA - 002-11134-00
Figure 5



ATC-3		
Oct. 1998	CB	ND
	o-DCB	ND
	m-DCB	120
	p-DCB	250

ATC-9		
Oct. 1998	CB	33
	o-DCB	190
	m-DCB	440
	p-DCB	380

ATC-8		
Oct. 1998	CB	NA
	o-DCB	NA
	m-DCB	NA
	p-DCB	NA

Large Tank Pit (GGW1-1)		
Sept. 2003	CB	ND
	o-DCB	ND
	m-DCB	ND
	p-DCB	ND

B-12		
Feb. 2002	CB	ND
	o-DCB	ND
	m-DCB	ND
	p-DCB	ND

B-11		
Feb. 2002	CB	ND
	o-DCB	ND
	m-DCB	ND
	p-DCB	ND

Small Tank Pit (GGW2-1)		
Sept. 2003	CB	74
After Pumping 65,000 gal.	o-DCB	24
	m-DCB	210
	p-DCB	360

ATC-1		
Oct. 1998	CB	370
	o-DCB	32
	m-DCB	370
	p-DCB	450

WCC-1A		
Dec. 1992	CB	270
	o-DCB	130
	m-DCB	1400
	p-DCB	1500
Oct. 1998	CB	220
	o-DCB	56
	m-DCB	900
	p-DCB	1500

ATC-2		
Oct. 1998	CB	92
	o-DCB	32
	m-DCB	590
	p-DCB	970

ATC-7		
Oct. 1998	CB	210
	o-DCB	54
	m-DCB	730
	p-DCB	1000

ATC-4		
Oct. 1998	CB	ND
	o-DCB	ND
	m-DCB	120
	p-DCB	250

B-3		
Feb. 2002	CB	ND
	o-DCB	ND
	m-DCB	ND
	p-DCB	ND

B-2		
Feb. 2002	CB	ND
	o-DCB	ND
	m-DCB	2.0
	p-DCB	4.8

ATC-6		
No Sample		

ATC-5		
Oct. 1998	CB	16
	o-DCB	3.3
	m-DCB	27
	p-DCB	42

OW-5		
Dec. 1998	CB	ND
	o-DCB	ND
	m-DCB	ND
	p-DCB	ND

OW-4		
No Sample		

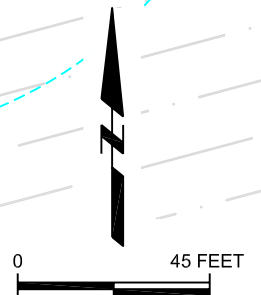
OW-7		
Dec. 1998	CB	31
	o-DCB	48
	m-DCB	360
	p-DCB	470

OW-6		
Dec. 1998	CB	8.3
	o-DCB	2.6
	m-DCB	27
	p-DCB	65

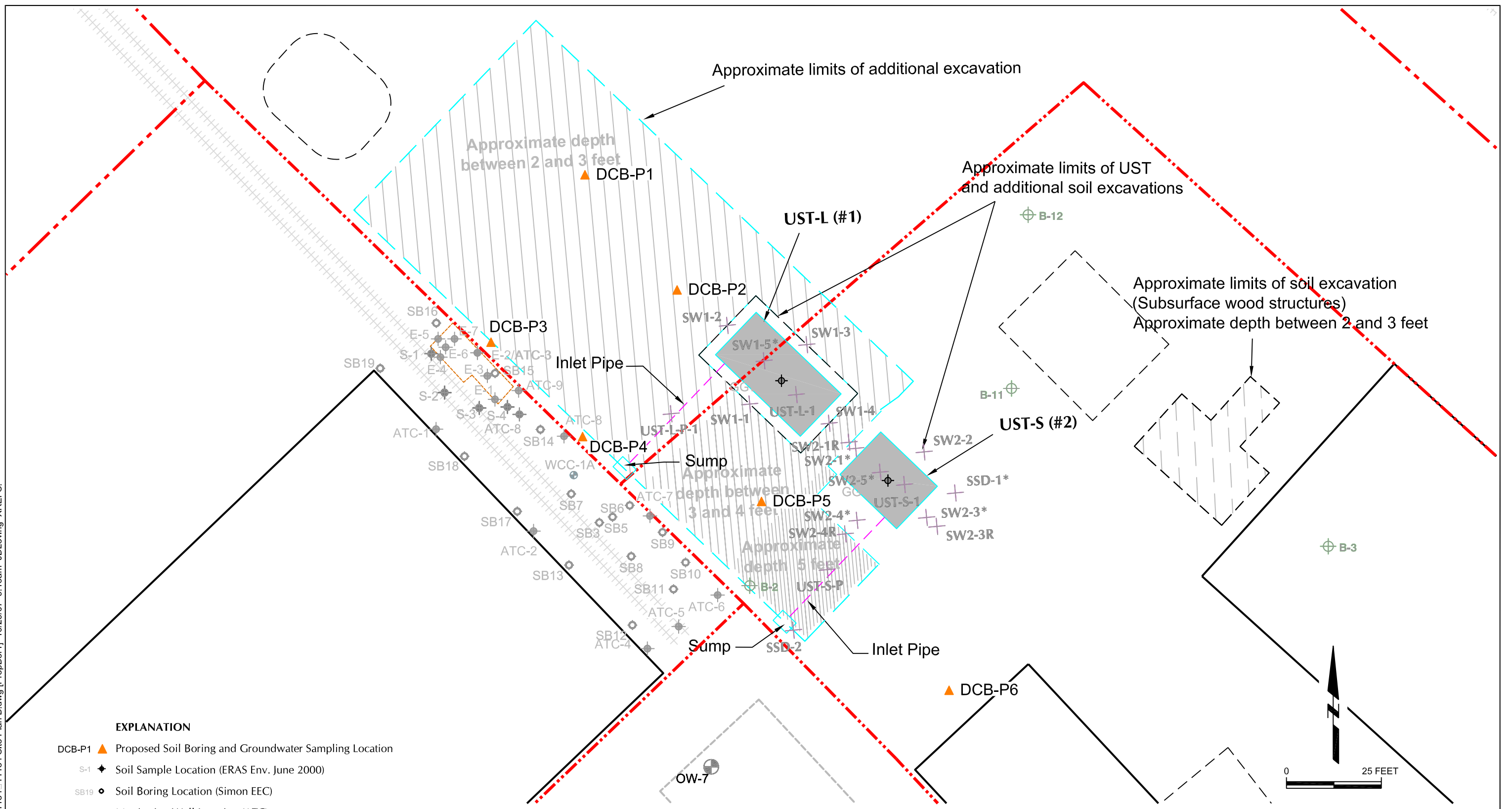
OW-1		
No Sample		

ATC-1		
Oct. 1998	CB	370
	o-DCB	32
	m-DCB	370
	p-DCB	450

LOCATION OF FORMER GAS HOLDER TANK REMOVED IN MAY 1990



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- DCB-P1 ▲ Proposed Soil Boring and Groundwater Sampling Location
- S-1 ◆ Soil Sample Location (ERAS Env. June 2000)
- SB19 ● Soil Boring Location (Simon EEC)
- WELL-1 ● Monitoring Well Location (ATC)
- Flag-3 ✕ Soil Sample/Soil Confirmation Sample Location (LFR)
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- Excavated Soil Limits (ERAS Env. June 2000)
- - - Tank Pit Excavation (LFR, September 2003)
- Excavated Soil Limits (LFR, September 2003)

Area Detail Map with Proposed Boring Locations

745 50th Avenue, Oakland, CA - 002-11134-00



Figure 7