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April 3, 2006

Mr. Barney Chan
Alameda County Department of Environmental Health
Hazardous Materials Division
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

RE: **WORKPLAN TO CONDUCT ADDITIONAL SITE ASSESSMENT**
Meyer's Plumbing Supply
311 2nd Street
Oakland, California
SECOR Project No.: 04OT.29220.21

Dear Mr. Chan:

SECOR International Incorporated (SECOR) is pleased to submit this work plan for the installation of four temporary groundwater monitoring points at the Jack London Square Site located at 311 2nd Street, in the City of Oakland, California (the Site). This work plan is designed to evaluate the presence, or lack thereof, of offsite migration of contaminants in the subsurface onto the subject property for the purposes of determining if groundwater impact is a result of additional unknown offsite sources.

1.0 SITE BACKGROUND

The Site consists of approximately 1.1 acres of land located at 311 2nd Street in the City of Oakland, County of Alameda, California. The Site consists of 14 contiguous plots in addition to a redistributed portion of Harrison Street which comprise one parcel. Currently, the Site is occupied by Meyer Plumbing Supply.

The Site is located in a commercial/industrial area of Oakland. The Site is bounded to the northwest by the Jack London Square Bath Gallery showroom and offices, a second office building, and an asphalt parking lot followed by Webster Street; to the northeast by 2nd Street then industrial buildings, a parking lot and offices; to the southwest by the Amtrak rail line followed by Embarcadero Street, a parking lot, and then a marina; and to southeast by an asphalt parking lot followed by the Jack London Square Amtrak Station.

The current structure on the Site is used predominantly to store plumbing parts and equipment (i.e. pipe, fittings, and tools). A small portion of the structure is also used as office space. Based on information obtained during this Phase I ESA (see below for additional detail) the Site has been occupied by this warehouse since prior to 1965. According to SECOR's review of historical documents, prior to 1939 until sometime before 1959 the Site was occupied by a smaller commercial structure. This structure is identified on Sanborn fire insurance maps as a steel fabricating and welding shop from sometime prior to 1950 until 1957.

SECOR conducted a Phase I ESA, dated April 22, 2005, which identified the following recognized environmental conditions (RECs) as warranting further investigation:

- According to groundwater monitoring well data near the Site and previous subsurface investigations, groundwater is expected to be encountered at a depth of approximately 7 feet below the ground surface. As in the following text, the EDR reports identify a total of 48 leaking underground storage tank (LUST) facilities within a half-mile radius of the Site. Of these 48 sites, 32 are located up-gradient with respect to groundwater flow of the Site. Given the numerous LUST facilities, SECOR considers it possible that groundwater in the vicinity of the Site is impacted with petroleum hydrocarbons. SECOR recommended as a result of the potential groundwater contamination analyzing groundwater on the up- and down-gradient sides of the Site in order to assess whether contaminants (i.e. petroleum hydrocarbons and volatile organic compounds) are present at levels which exceed the acceptable human health risk criteria for residential development.
- The 1950 through 1957 Sanborn Fire Insurance maps indicate that a steel fabrication and welding shop is located on the Site. Potential contamination of Site soils may have occurred during the time when the shop and associated scrap iron storage yard were located on the Site. SECOR recommended sampling the Site soils for metals and petroleum hydrocarbons in order to assess whether these contaminants at levels which exceed human health risk criteria for residential development.
- According to the EDR report, the Site is listed under the LUST and Cortese databases for having a leaking underground storage tank. SECOR reviewed previous environmental reports supplied by the seller which discussed subsurface investigations relating to this UST under the oversight of the County of Alameda Department Environmental Health (ACDEH). A 1,000-gallon UST was reportedly closed in place prior to 1976 by filling it with concrete. This UST is reportedly still located on the property. It is unknown whether the UST stored gasoline or diesel. Previous soil and groundwater investigations indicated residual petroleum hydrocarbon contamination in the soil and groundwater in the vicinity of the UST, discussed as follows:
 - In September of 1993, two angled soil borings (SB-1 and SB-2) were drilled under the UST by Blymer Engineers, Inc. (BEI). BEI was contracted by Meter Plumbing Supply to perform a closure site assessment for the UST. Soil samples were obtained from SB-1 and SB-2 at 5.5 and 7.0 feet, respectively. Analytical results for borings SB-1 and SB-2 showed that TPH-D was detected at concentrations of 4.2 and 15,000 parts per million (ppm), respectively, and that lead was detected in concentrations of 71 and 84 ppm, respectively. In boring SB-1, TPH-G and BTEX were not detected except for 0.0090 ppm xylenes. In boring SB-2, TPH-G was detected at a concentration of 34 ppm while ethylbenzene and xylenes were detected at concentrations of 0.65 and

0.82 ppm, respectively. The groundwater sample from boring SB-2 showed 5.5 ppm TPH-D, 0.085 ppm TPH-G, and benzene, toluene and xylenes at concentrations of 0.0027, 0.00066, and 0.00051 ppm, respectively.

- After receipt of the BEI report, the Alameda County Department of Environmental Health (ACDEH) indicated that further investigation would be necessary to vertically and laterally delineate the detected contamination. In response to this request, Meyer Plumbing contracted AllPro Environmental Corporation (AllPro) in March of 1996. At this time, AllPro obtained soil and groundwater samples from four borings placed down-, cross-, and up-gradient of the UST identified as B3 & B4, B5, and B6, respectively. All of these borings were placed outside the neighboring warehouse structure. According to the AllPro report, analytical results of soil samples obtained from all the borings showed that TPH-g, BTEX, MTBE and TPH-D were not detected except for the samples obtained from boring B6 at a depth of 4.5 feet, where TPH-D was detected at a concentration of 16 ppm. Lead was detected in the soil samples from borings B3, B4, B5, and B6 at concentrations of 58, 310, 9.3, and 23 ppm, respectively. According to the AllPro report, analytical results of groundwater samples obtained from all the borings showed that TPH-g, BTEX, MTBE and TPH-D were not detected. Lead was detected in the groundwater samples from borings B3, B4, B5, and B6 at concentrations of 0.049, 1.7, 0.68, and 0.49 ppm, respectively.
- In response to the AllPro report, the ACDEH issued a no further action letter dated June 18, 1996 whereupon case closure was granted for the former UST on the Site. This letter does state that any Site modifications such as a change in land use may require a "re-evaluation of the chemical exposure pathways, receptor sensitivities (i.e. residential vs. commercial/industrial), and other applicable criteria which may have been used to assess potential human health risk during the case closure process."
- SECOR recommended that future case closure requirements, if any, be determined through discussions with the ACDEH and Regional Water Board, based on the intended residential land use and in accordance with the department's requirements as set forth during initial case closure. SECOR also recommended additional soil and groundwater sampling be performed adjacent to the UST, including the interior of the warehouse structure where the former fuel dispenser was located, in order to confirm that contaminant levels exist below regulatory guidelines for residential development or to better estimate the volume of soils that must be excavated and the degree of groundwater remediation that may be necessary, if any, prior to such development. SECOR also recommended that the concrete-filled UST be removed as part of Site development.

Based on the results of the Phase I ESA, SECOR conducted the Phase II subsurface soils investigation of the Site on May 3, 2005, to investigate the subsurface soils and groundwater in the areas identified in the Phase I ESA as needing further assessment.

The analytical results of the Phase II ESA indicate that petroleum hydrocarbons (primarily diesel fuels) and lead contamination exist in the majority of the Site at levels which will require further characterization. The detected concentrations of lead are at hazardous levels (based both on total and soluble threshold limit concentration) and will require disposal as a hazardous waste if removed from the Site. For development purposes, a human health risk assessment will be necessary to evaluate options for capping of the Site to manage the lead without removing it from the Site. Government agency interaction and approval will be necessary if the lead is to be left at the Site. It is unclear from the data collected whether the lead in soil is from an onsite source or is a regional problem, resulting from placement of old fill on the Site. Therefore, additional assessment may be necessary to determine the source and extent of lead contamination on the Site.

SECOR recommended that a human health risk assessment (HHRA) be conducted to evaluate if a risk exists with regards to vapor intrusion, due to diesel fuel contamination detected in groundwater at shallow depths (approximately 5 to 6 feet below ground surface). This HHRA could then be used to evaluate whether any clean up is necessary to allow development as residential property and assure future residents no excess health risk exist due to the residual contamination on Site. Another option the HHRA could help evaluate is whether a vapor barrier will be necessary to control potential vapor intrusion created by the diesel fuel in the groundwater in the vicinity of the former UST if that is the driver of risk. In addition, the extent of diesel fuel and, to a lesser extent, gasoline in groundwater and soil are not defined. It is unclear whether the Site is the source of all detected impact on the property or if a regional groundwater plume exists which is also affecting the Site. The ACDEH may require further assessment of this impact as part of the Site revaluation for residential development.

The groundwater sample from boring B-6, which was located in the northern up-gradient corner of the Site, reported a tetrachloroethene (PCE) concentration of 8.2 µg/L. This exceeds the state Maximum Contaminant Level (MCL) for PCE in drinking water of 5.0 µg/L. Given that this PCE appears to originate from an off-site source and that a potable water source is not planned as part of future Site development, SECOR recommended no additional investigation. However, SECOR recommended this detection of PCE be addressed in the recommended HHRA.

The Alameda County Department of Environmental Health (ACDEH) issued a no further action letter dated June 18, 1996, whereupon case closure was granted for the former UST on the Site. This UST still exists on the Site and is filled with concrete. This UST will need to be removed during planned demolition activities. The ACDEH letter states that any Site modifications, such as a change in land use, may require a "re-evaluation of the chemical exposure pathways, receptor sensitivities (i.e. residential vs. commercial/industrial), and other applicable criteria which may have been used to assess potential human health risk during the case closure process."

Based on the planned land use change of the Site, it was recommended that the ACDEH

receive a copy of this report to evaluate if any additional assessment, a HHRA or potential remediation may be necessary to obtain a new case closure for residential use.

In your letter dated February 16, 2006 you provided technical comments concerning the above identified environmental issues. In addition, you requested that a work plan be submitted to address these issues. Based on this request, SECOR is submitting this work plan for your review and approval.

2.0 SCOPE OF WORK

2.1 Up-Gradient Groundwater Contamination Sources File Review

SECOR will provide supporting information collected as part of the Phase I ESA discussing the large number of reported leaking USTs in close proximity to the Site that have reportedly affected groundwater. This will also include conducting file reviews on potential up-gradient contamination sources.

2.2 USA Notification and Marking

As required by law, SECOR will visit the Site to mark the proposed boring locations and acquire a current Underground Service Alert (USA) ticket number prior to commencement of Site drilling activities.

2.3 Pre-Drilling Activities

In accordance with federal OSHA regulations (29 CFR, Section 1910.120), SECOR will develop a site specific Health and Safety Plan (HASP) for the subject property. All SECOR personnel will be required to be familiar with, and comply with, all provisions of the HASP.

SECOR will coordinate site access, attempt to locate subsurface structures to avoid damage during drilling activities, and develop a project schedule with the Olson Company, site owner, and SECOR's subcontractors.

2.4 Boring and Encroachment Permits

As required by the Alameda County Public Works Agency, SECOR will acquire the necessary well permits for the advancement of borings and the necessary encroachment permits to drill in the public right-of-way near the Site.

2.5 Up-Gradient Groundwater Assessment

To evaluate the presence of TPH in the subsurface from up-gradient off-site sources, SECOR is proposing to advance four (4) borings up-gradient of the Site in order to sample the groundwater for petroleum hydrocarbons and VOCs analysis. Hydropunch groundwater samples will be collected at a depth where water is first encountered, estimated to be approximately 5-7 feet bgs. The borings will be located in areas near the Site in an effort to best evaluate the contribution of potential contamination of groundwater

by nearby LUST facilities. All groundwater samples will be submitted to a state certified laboratory for TPH carbon-chain (C6-C40) and VOCs analysis.

Upon reaching the approximate groundwater depth interval of 5-7 feet bgs, a 1.25-inch outer-diameter hydropunch sampling tool will be advanced down the open borehole. Upon reaching the base of the boring, the hydropunch sampling tool will be advanced approximately two feet into undisturbed saturated sediments using a hydraulic ram on the drilling rig. The outer portion of the sampling tool will then be withdrawn approximately four feet to allow the inner slotted stainless steel casing to come into contact with groundwater. Surging and bailing will then be accomplished using a 3/8-inch diameter poly tubing and a 2-foot long by 1/2-inch diameter bailer to induce the creation of native filter pack around the slotted section.

Groundwater sampling at each location will be performed after approximately 500 milliliters (ml) of water is purged from the stainless steel casing. During sampling, groundwater will be transferred directly from the poly tubing into clean, 40mL, glass vials with HCl preservative provided by the laboratory. Once the containers are full, threaded lids will be attached, the containers will be labeled and placed into an iced cooler pending transport, under Chain-of-Custody, to a laboratory for chemical analysis.

2.6 On-Site Lead

Lead has been found in soils on-Site in excess of U.S. EPA region 9 PRGs and in some cases above the California TTLC for definition as a hazardous waste. It is our opinion this lead is from regional sources (old fill). The Alameda County Department of Environmental Health indicated that the county has seen this before in other areas. SECOR proposes no more site characterization of the lead in soil prior to demolition of the building. Our plan, as discussed with you, is to characterize all soil excavated at the site as part of construction and determine from that profiling where regulation requires the soil to be disposed of. Those soils would then be properly disposed of from the site. As part of that construction, additional soil samples will be collected to evaluate where any residual lead contaminated soils exist that will remain on Site after construction. The Olson Company would then desire to leave those lead contaminated soils on-Site below the new building slab. A map will be made depicting the location, concentrations, and depth of the lead in soil. This will be attached to the deed of the property as a notification of the presence of lead. A plan will also be provided to establish procedure for any construction work that may be required in the future that may uncover this lead contaminated soil.

It is SECOR's understanding that this procedure was allowed to occur on other sites (like Mandela Gateway Project) located a few blocks away at 7th and Mandela. In addition, SECOR understands that the ACDEH will forward to us the deed notification/restriction language that the county would like to see on our deed when we follow this procedure.

2.7 Underground Storage Tank Soil and Groundwater Contamination

The abandoned in-place UST will be removed as part of Site re-development activities. When that UST is removed, soil contamination located around the UST will be removed and disposed of from the project Site. In advance of the UST removal, SECOR requests

that the county provide Site specific clean up levels to help determine the extent of excavation and removal required. The Site usage will be parking on the bottom floors (no subsurface parking) and living space in the upper floors of the structure in this development.

If groundwater is encountered during removal of the UST and contamination is identified, removal of this water in the excavation will be undertaken. SECOR requests the County's specific recommendation for clean up criteria to be used for groundwater in this case.

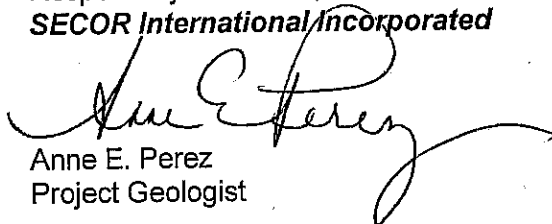
2.8 Reporting

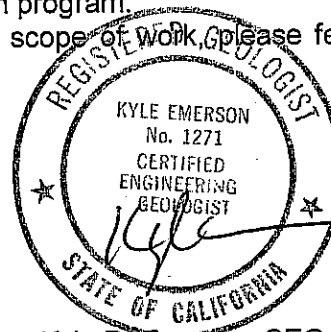
Upon completion of the scope of work and field activities described herein, SECOR will prepare a comprehensive technical report detailing the installation of the temporary groundwater monitoring points, the sampling activities, and the off-site file review. The report will include a description of field methods and the laboratory reports. The report will also contain general findings about subsurface conditions, detected constituent concentrations, and comparison to generally accepted regulatory requirements. The report will provide an opinion of the need for groundwater mitigation in accordance with ACDEH regulations.

3.0 CLOSURE

It has been SECOR's pleasure in providing this work plan for your review. Upon your authorization to proceed, SECOR will immediately obtain the appropriate boring and encroachment permits and schedule the field investigation program. Should there be any questions regarding the proposed scope of work, please feel free to contact the undersigned at (909) 335-6116.

Respectfully submitted,
SECOR International/Incorporated


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