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Alameda County Environmental Health

September 9, 2007

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Alameda County Environmental Health 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502

Attention: Mr. Jerry Wickham

Response to ACEH Comments in Letter Dated February 27, 2007 Sparkle Cleaners Eastmont Town Center 7000 Bancroft Avenue Oakland, California SLIC Case RO0002942

Dear Mr. Wickham:

On behalf of SKB-Eastmont Oakland Associates, LLC, current owner of the subject site, PES Environmental, Inc. (PES) has prepared this response to comments presented in the Alameda County Environmental Health (ACEH) letter dated February 27, 2007. The ACEH provided approval for the recently completed remedial action at the Sparkle Cleaners dry-cleaning facility located at the subject property. In particular, this letter responds to ACEH Technical Comments 5 and 6. The remaining comments in this letter were either addressed during: (1) the recent soil remediation activities and monitoring well installation/sampling activities at Sparkle Cleaners (the site); or (2) are not of concern based on the results of the remedial activities. The results of the remedial activities are present in the PES' Post-Remediation Report (PES, 2007)¹. Details of the monitoring well installation and sampling activities will be presented under separate cover in the quarterly report that is due to the ACHCS by the end of October 2007. The location of Sparkle Cleaners within the Eastmont Town Center is shown on Plate 1.

¹ PES, 2007. Post-Remediation Report, Voluntary Soil Remediation, Sparkle Cleaners, Eastmont Town Center, 7000 Bancroft Avenue, Oakland, California. September 9.

Mr. Jerry Wickham September 9, 2007 Page 2

RESPONSES TO COMMENTS

Comment 5: On-site Industrial Well. A Site Map labeled Figure 2, which appears to be from a report by Artesian Environmental Consultants dated August 27, 1993 and is attached to the work plan, identified an industrial water well southeast of Sparkle Cleaners. A review of a Water Well Driller's report in ACEH files, indicates that an industrial well was installed at the site in 1951. The well, which was perforated from 90 to 393 feet bgs, was 12 inches in diameter. A notation on the Well Driller's Report indicates that the well was located 250 feet east of Bancroft Avenue and 650 feet north of 73rd Avenue, which would place the well south of Sparkle Cleaners. Please indicate whether this well was decommissioned and discuss the potential for this well to be a receptor for groundwater contamination from the site.

Response to Comment 5: Based on review of available information for the historical "industrial well", it appears that the well was abandoned approximately 45 years ago. No details of the abandonment process were identified. The information reviewed is summarized below:

- A water well drillers report dated September 1962 indicates that the "industrial well" was not in use because "it sanded in 1953-54". The well use category on the report is identified as "abandoned"; no further details are provided. In addition, the drillers report identifies the well location as 450 feet north of 73rd Avenue and 550 feet east of Bancroft. Because the well completion date (March 9, 1951) matches the 1951 drillers report, this appears to be a different mapped location of the same well. The 1951 water well drillers report for the installation of the "industrial well" and the 1962 drillers report are included as Appendix A.
- The "Industrial well" is labeled as abandoned on the Artesian Environmental Consultants Site Map reference above by the ACEH (see Appendix B). This map shows the well beneath the former IGA Market, which is the current location of Gazzali's Market.
- A phase I Environmental Site Assessment (ESA) Report prepared by EBI Consulting (EBI, 2004)² indicated that the property representative, Mr. Bridwell, informed EBI that a search for the suspected "industrial well" was unsuccessful.
- Mr. Paul Bernard, representative for Eastmont Town Center, was interviewed regarding knowledge of the "industrial well". Mr. Bernard has been associated with the subject property for approximately 2 years. Mr. Bernard stated that he has no

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² EBI Consulting, 2004. Phase I Environmental Site Assessment Report, Eastmont Town Center, 7200 Bancroft Avenue, Oakland, California. October 31.

Mr. Jerry Wickham September 9, 2007 Page 3

knowledge of the existence of an industrial well at the site. In addition he noted that recent and prior property owners had searched for historical site development and construction plans. It was his understanding that such plans maintained at the site were previously destroyed in a sprinkler flood, and files maintained by the City of Oakland were destroyed in a fire.

With regard to the potential for the "industrial well" to be a receptor for groundwater contamination at the site, PES has reviewed recent groundwater level data. Based on the August 7, 2007 depth-to-water measurements the four newly installed wells MW-1 through MW-4 (i.e., installed in July 2007), shallow groundwater at the site flows toward the west. Groundwater elevation data and contours are presented on Plate 2. In addition, analytical results for samples collected from these wells on August 7, 2007 also support a westward flow direction. As noted above, the results for this sampling event will be present under separate cover in a quarterly monitoring report that is due to the ACEH by the end of October 2007.

Based on the reported abandonment of the historical "industrial well", the location of the well at the subject property with regard to the Sparkle Cleaners facility, and the groundwater flow data, the "industrial well" is not a potential receptor for groundwater contamination associated with the site.

Comment 6: Assembly Plant USTs. A Phase II Limited Subsurface Investigation Report, dated December 22, 2004 and prepared by EBI Consulting, indicates that a Chevrolet Fisher Body Plant occupied the site from 1916 to 1965 and that five USTs were in use at the site. Please describe the locations of the former assembly plant USTs in relation to the Sparkle Cleaners.

Response to Comment 6: The approximate locations of the former underground storage tanks (USTs) at the Chevrolet Fisher Body Plant are shown on Sanborn Fire Insurance maps for 1917, 1925, 1950, 1952, 1959, and 1960. Copies of the Sanborn maps are provided in Appendix C. Notations regarding the tank size and contents (where available) have been added to the Sanborn maps to facilitate interpretation. The approximate locations of the former USTs in relation to Sparkle Cleaners are shown on Plate 1.

No files documenting the removal of the USTs were identified. However, it is likely that the USTs were removed prior to the construction of the mall buildings in the late 1960s and early 1970s so they would not interfere with subsurface construction activities such as grading, utility construction, and the installation of foundation footings.

Mr. Jerry Wickham September 9, 2007 Page 4

We trust that this is the information that you require at this time. Please contact us with any further questions.

Yours very truly,

PES ENVIRONMENTAL, INC.

Gary Thomas

Senior Geologist

William W. Mast, P.G.

Associate Engineer

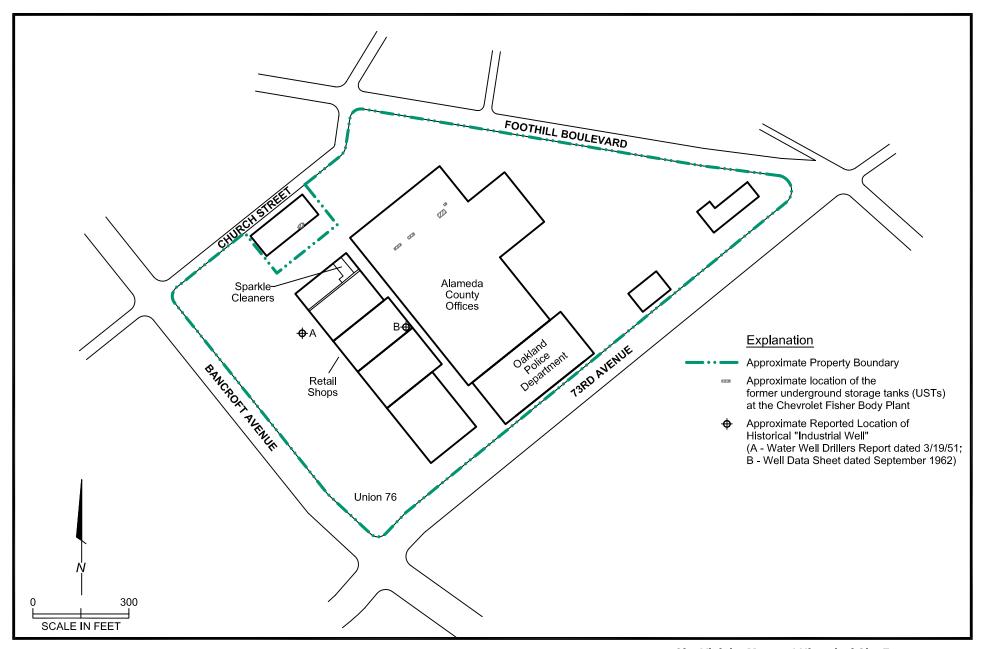
cc: Ms. Kathleen Schulz - SKB - Eastmont Oakland Associates, LLC

Attachments: Plate 1 - Site Vicinity Map and Historical Site Features

Plate 2 - Groundwater Potentiometric Surface Map - August 7, 2007

Appendix A - 1951 and 1962 Water Well Drillers Reports for "Industrial Well"

Appendix B – Artesian Environmental Site Map Appendix C – Sanborn Fire Insurance Maps **PLATES**



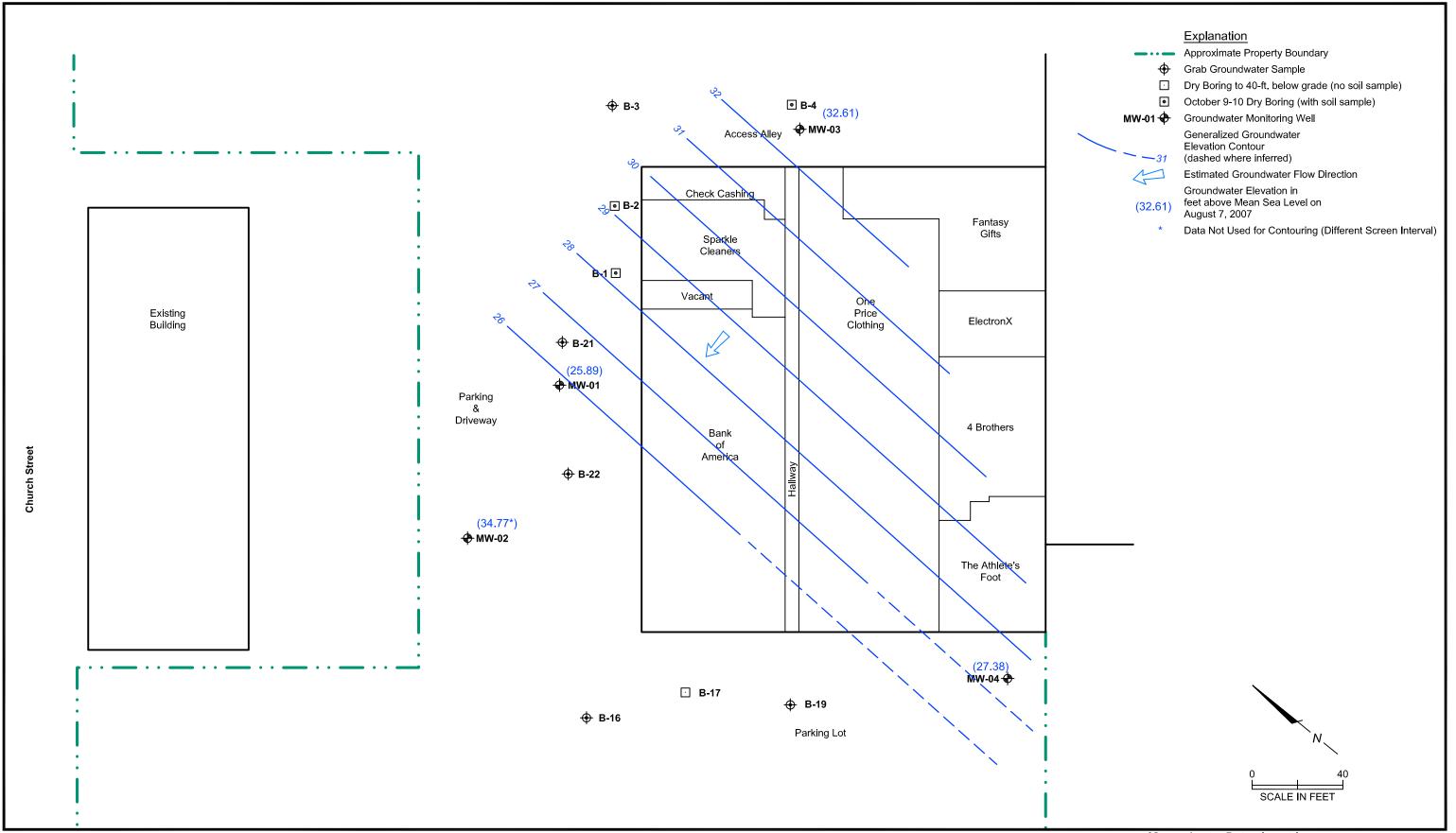


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REVIEWED BY

Site Vicinity Map and Historical Site Features
Eastmont Town Center
7200 Bancroft Avenue
Oakland, California

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PES Environmental, Inc.
Engineering & Environmental Services

iGroundwater Potentiometric Surface Map - August 7, 2007 Eastmont Town Center 7200 Bancroft Avenue Oakland, California

PLATE

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APPENDIX A

1951 AND 1962 WATER WELL DRILLERS REPORTS FOR "INDUSTRIAL WELL"

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P. O. BOX 1070
SACRAMENTO S. CALIFORNIA

STATE OF CALIFORNIA DEPARTMENT OF PUBLIC WORKS

DIVISION OF WATER RESOURCES

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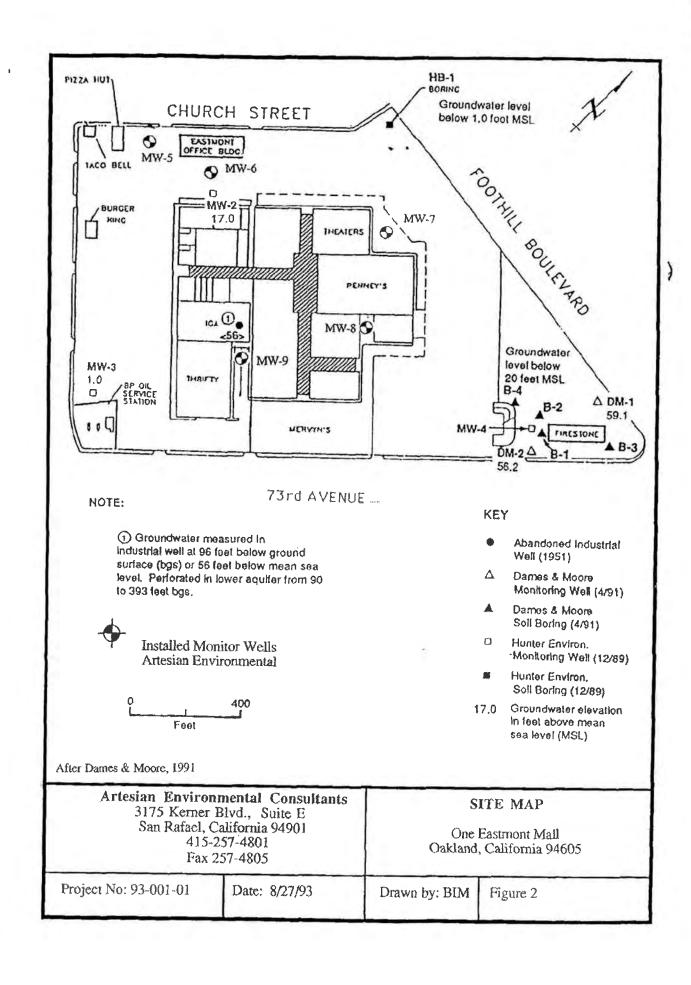
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APPENDIX B

ARTESIAN ENVIRONMENTAL SITE MAP



APPENDIX C

SANBORN FIRE INSURANCE MAPS

