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SCS ENGINEERS

March 17, 2008
Project Number: 01205501.17

Copy No. ____

Mr. Jerry Wickham
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Technical Comments - Response to Alameda County Health Care Service (ACHCS) Letter dated February 29, 2008

Site: Assessor's Parcel Number (APN) 045-6302-010-05
555 98th Avenue
Oakland, California

Dear Mr. Wickham:

Pursuant to our recent conversation, and in response to your letter dated February 29, 2008, SCS Engineers (SCS) is presenting this letter on behalf of our client, Mr. Leo Puig, of AMCAL Multi-Housing, Inc., to address your technical comment.

BACKGROUND

The ACHCS prepared a letter entitled, *SLIC Case RO0002958 and Geotracker Global ID SLT19701216, AMCAL Multi-Housing Development, 555 98th Avenue, Oakland, CA 94603*, dated February 29, 2008. The technical comment in connection with environmental conditions at the Site was as follows:

- The Phase I report entitled, 'Limited Phase I Environmental Site Assessment, 9755 Edes/593 98th, Oakland, California', which was dated August 28, 1997 and prepared by Gettler-Ryan, Inc., indicated that, 'Two hydraulic hoists and an oil water separator were present on the concrete floor pad,' in the former auto service station building. A later Phase I Report entitled, 'Phase I Environmental Site Assessment, Assessor's Parcel Number (APN) 045-5302-101-05, 555, 591, 594, and 599 98th Avenue, Oakland, California', which was dated November 8, 2006 and prepared by SCS Engineers, refers to the previous historic observations of the hydraulic hoists and oil water separator but does not indicate whether the hydraulic hoists remain at the site or were removed. Please clarify whether the two hydraulic hoists and oil water separator located in the concrete pad of the former service station building are still present or were removed. If the hydraulic hoists were removed,

please provide documentation of the removal and environmental conditions surrounding the soil."

SCS has prepared Figure 1, which presents a Site plan including the interpreted location of the former gasoline service station building, former inground hydraulic lifts, former inground oil water separator, soil sampling locations and laboratory results adjacent to the former lifts and oil water separator, soil vapor locations and laboratory results at the Site (including soil vapor samples collected within the interpreted footprint of the former gasoline service station building), and proposed Site building locations. The proposed Site development is based on a Site plan prepared by R.L. Davidson Architecture and Planning, dated September 11, 2007. The locations of the former gas station building, hydraulic lifts and oil water separator, and soil samples are based on a Site plan included in a report titled *Limited Phase I Environmental Site Assessment at 9755 Edes Avenue/593 98th Avenue Oakland, California,* dated August 28, 1997, and prepared by Gettler-Ryan, Inc. (Gettler-Ryan).

GETTLER-RYAN, INC. SOIL SAMPLING ACTIVITIES (1997)

Based on a report entitled, *Well Installation and Soil Boring Report,* dated October 9, 1997, prepared by Gettler-Ryan, Inc., five exploratory borings were drilled and sampled at the Site on September 17, 18 and 19, 1997. Two of these borings (B-3 and B-4) were reportedly advanced in the immediate vicinity of the hydraulic hoists and oil water separator. The reported boring locations and sample results are presented on Figure 1. Soil samples were collected at 6 feet below grade in these borings and analyzed for total petroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as diesel (TPHd), benzene, toluene, ethylbenzene, total xylenes (BTEX), and methyl tertiary butyl ether (MTBE), oil and grease (O&G), halogenated volatile organic compounds (HVOCs), and semi-volatile organic compounds (SVOCs). TPHg, TPHd, BTEX, MTBE, O&G, HVOCs, and SVOCs were reported not to be present at concentrations above the laboratory reporting limits in soil samples collected from borings B3 and B4.

SCS PHASE I ENVIRONMENTAL SITE ASSESSMENT (2006)

SCS prepared a report entitled, *Phase I Environmental Site Assessment, Assessor's Parcel Number (APN) 045-5302-010-05, 555, 591, 594, and 599 98th Avenue, Oakland, California*, which was dated November 8, 2006. This report recommended the following in connection with the former hydraulic lifts and oil water separator:

- "We also recommend a geophysical survey be performed at the Site to confirm that typical underground structures associated with the operation of a service station and car wash (e.g., lifts, clarifiers, additional USTs, dispenser piping/islands, etc.) are no longer present at the Site. If these features are found, additional investigation may be required."

SCS GEOPHYSICAL SURVEY (2007)

Based on the above-referenced SCS recommendation (2006), on May 30, 2007, SCS subcontracted Subt
ronic Corporation (Subtronic) to perform a geophysical survey of the Site, which was summarized in the report entitled, *Summary Report, Additional Site Investigation Activities, 555 98th Avenue, Oakland, California*, which was dated June 19, 2007. This report provided the following conclusion in connection with the geophysical survey:

- "Results of the geophysical survey did not reveal any large anomalies on the Site, but instead discovered two small anomalies. The geophysical survey did not find any evidence of underground storage tanks (USTs) in the majority of the property, but the presence of a UST cannot be ruled out in the areas of construction and metallic debris piles."

SCS SOIL VAPOR SURVEY AND HUMAN HEALTH RISK ASSESSMENT (2007)

On May 31, 2007, SCS subcontracted Transglobal Environmental Geochemistry (TEG) to perform a soil vapor survey of the Site, which was summarized in the report entitled, *Summary Report, Additional Site Investigation Activities, 555 98th Avenue, Oakland, California*, which was dated June 19, 2007. Methylene chloride and toluene were the only two volatile organic compounds (VOCs) detected during the soil vapor survey. This report provided the following conclusion in connection with the soil vapor survey:

- "Methylene chloride was detected in 1 of the 10 soil vapor samples at a concentration of 0.10 micrograms per liter (ug/L) of vapor. This concentration is below the 2.4 ug/L residential ESL (Environmental Screening Levels established by the San Francisco Bay Regional Water Quality Control Board for residential soils) established for methylene chloride in soil vapor. Toluene was detected in 1 of the 10 soil vapor samples at a concentration of 0.12 ug/L of vapor. This concentration is below the 63 ug/L residential ESL established for toluene in soil vapor. All other remaining EPA Method 8260B VOCs were not detected in soil vapor

samples. In summary, VOCs were not detected in soil vapor at concentrations exceeding residential ESLs."

Based on the above-referenced soil vapor concentrations detected at the Site, SCS prepared a human health risk assessment in general accordance with California Department of Toxic Substances Control guidelines. The health risk assessment is summarized in a report entitled, *Letter Report to Alameda County Department of Environmental Health (ACDEH), Assessor's Parcel Number (APN) 045-6302-010-05, 555 98th Avenue, Oakland, California*, which was dated October 11, 2007. This report provided the following conclusion in connection with the human health risk assessment:

- "A human health risk assessment using the results fo the soil vapor survey and conducted in general accordance with California Department of Toxic Substances Control (DTSC) guidelines for residential Site land use indicated that there is a low likelihood that a significant human health risk exists at the Site in connection with vapor intrusion into the proposed Site buildings."

Please note the two of the soil vapor samples were collected within the interpreted footprint of the former gasoline service station building where the inground hydraulic lifts and oil water separator were formerly located. The laboratory reported that no VOCs were detected above laboratory detection limits in these two soil vapor samples.

CONCLUSIONS

Based on the information provided above, and our experience, we believe that the former inground hydraulic lifts and oil water separator at the Site will not have an impact on the redevelopment of the Site for residential purposes for the following reasons.

- Soil samples were collected adjacent to the inground hydraulic lifts and oil water separator and no detectable concentrations of total petroleum hydrocarbons as gasoline (TPHg), total petroleum hydrocarbons as diesel (TPHd), benzene, toluene, ethylbenzene, total xylenes (BTEX), and methyl tertiary butyl ether (MTBE), oil and grease (O&G), halogenated volatile organic compounds (HVOCs), and semi-volatile organic compounds (SVOCs) were reported.

- A geophysical survey performed at the Site did not indicate obvious indications of the presence of subsurface anomalies associated with the possible presence of inground hydraulic lifts or oil water separators.

- Soil vapor samples were collected within the interpreted footprint of the former gasoline service station and no detectable concentrations of volatile organic compounds (VOCs) were reported.

- A human health risk assessment was completed for the Site, which indicated that there is a low likelihood of a significant human health risk.

- The Site is proposed to be redeveloped with on-grade structures and soil will reportedly not be excavated and exported from the Site as part of Site redevelopment.

- Based on the assessment and subsurface assessment activities discussed above, it is our professional opinion that there is a low likelihood that the former presence of inground hydraulic lifts and an oil water separator will impact the proposed redevelopment of the Site.

RECOMMENDATION

Based on the assessment and subsurface assessment activities conducted at the Site and our conclusions discussed above, we recommend that the Alameda County Health Care Service (ACHCS) concur that there is a low likelihood that the former presence of inground hydraulic lifts and an oil water separator will impact the proposed redevelopment of the Site.

We greatly appreciate your time and attention to this matter. We look forward to your response at your earliest convenience. If we may assist you in any way, now or in the future, please do not hesitate to call our office at (858) 571-5500.

Respectfully,
SCS ENGINEERS.

Sean Roy
Project Professional

Ryan T. Marcos
Project Manager

Robert Q. Gutzler, Ph. D., P.G. 5571
Senior Project Professional

SR
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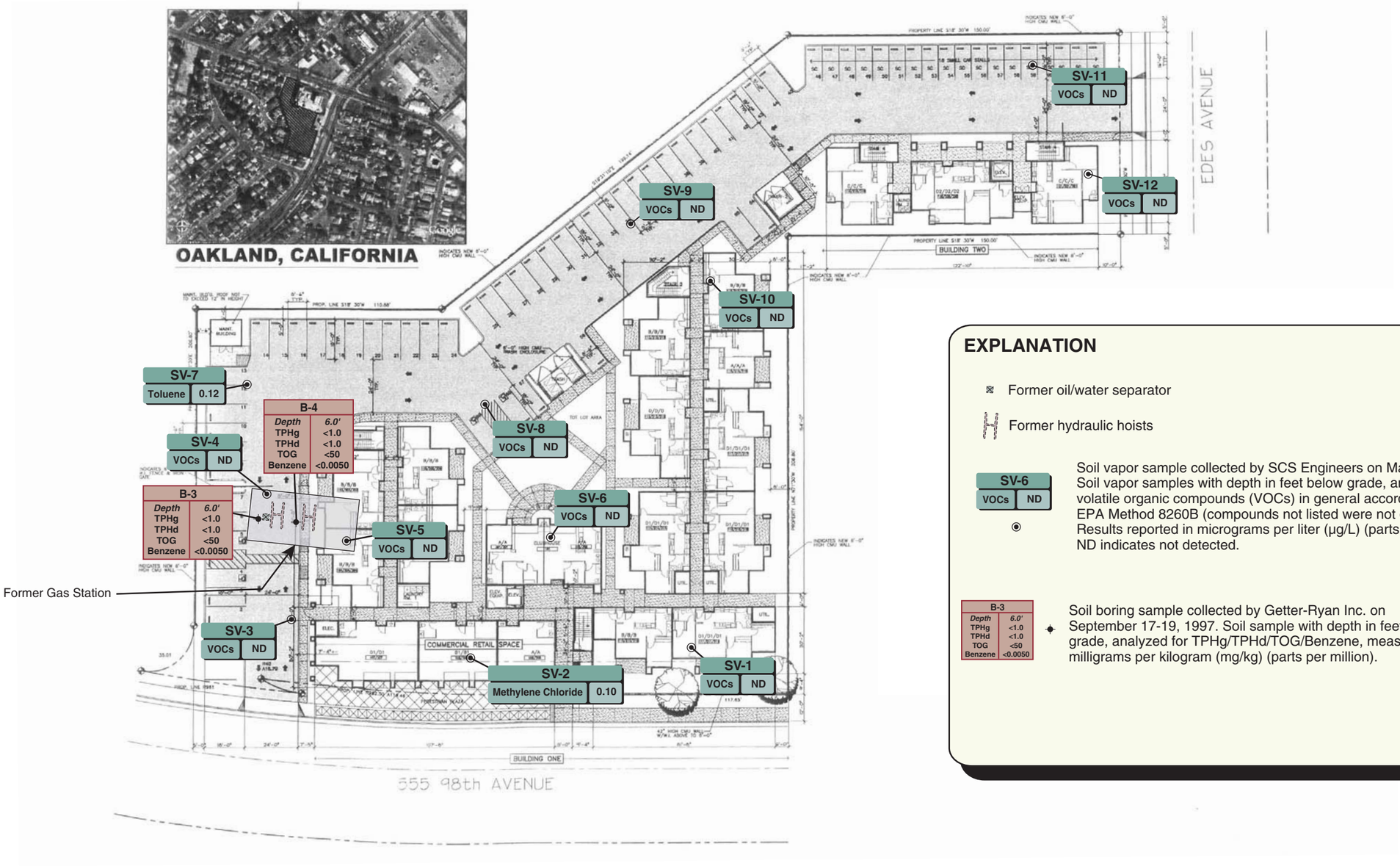

EXPLANATION

- Former oil/water separator
- Former hydraulic hoists

SV-6 | VOCs | ND

Soil vapor sample collected by SCS Engineers on May 31, 2007, Soil vapor samples with depth in feet below grade, analyzed for volatile organic compounds (VOCs) in general accordance with EPA Method 8260B (compounds not listed were not detected). Results reported in micrograms per liter (µg/L) (parts per billion). ND indicates not detected.

B-3	
Depth	*6.0'*
TPHg	<1.0
TPHd	<1.0
TOG	<50
Benzene	<0.0050

Soil boring sample collected by Getter-Ryan Inc. on September 17-19, 1997. Soil sample with depth in feet below grade, analyzed for TPHg/TPHd/TOG/Benzene, measured in milligrams per kilogram (mg/kg) (parts per million).

0 25 50 75
Approximate Graphic Scale in Feet

North

Disclaimer: This figure is based on available data. Actual conditions may differ. All locations and dimensions are approximate.

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SITE PLAN WITH PREVIOUS SELECTED SAMPLE LOCATIONS AND PROPOSED DEVELOPMENT

AMCAL
555 98th Avenue
Oakland, California

Project No.: 01205501.17

Figure 1

Date Drafted: 3/18/08