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Alameda County  
Environmental Health

October 20, 2010

Paresh C. Khatri  
Alameda County Env. Health Services  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502



**ENVIRONMENTAL ENGINEERING, INC.**  
6620 Owens Drive, Suite A • Pleasanton, CA 94588  
TEL (925)734-6400 • FAX (925)734-6401  
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**Re: Request for Expedited Completion of Remedial Excavation at 6501  
Shattuck Avenue, Oakland, CA**

Dear Mr. Khatri:

In light of the approaching rainy season, SOMA Environmental Engineering, Inc. (SOMA) submits this letter to request your approval for expediting the completion of remedial excavation activities at 6501 Shattuck Ave, Oakland site. Figure 1 illustrates the extent of the existing open soil excavation at the site.

As you are aware, in September 2009, the removal of six steel underground storage tanks (USTs) located at the subject site and the subsequent soil excavation activities requested by the Oakland Fire department was initiated. The presence of soil and groundwater contamination was confirmed following the initial soil removal activities. At this time, the excavation pit is still open, and the property owner is awaiting further instructions from your agency.

Due to the presence of residual soil contamination inside the excavation pit, as evidenced by October 2009 and July 2010 sampling, SOMA recommends implementing an interim removal action plan while the excavation pit is still open. Therefore, at this time SOMA seeks your approval for conducting an expedited soil removal and backfilling activities, before the start of major rain in the upcoming season, to avoid creating ponding and storm runoff of contaminated groundwater.

Therefore, SOMA proposes the following action items for timely continuation of remedial excavation, confirmation soil sampling, and backfilling activities.

***Pre-Excavation Activities***

Prior to resuming excavation activities at the site, SOMA will ensure that proper permitting and regulatory agency notifications are in place. Furthermore, a site-specific Health and Safety Plan will be prepared in accordance with Occupational Safety and Health Administration (OSHA), "Hazardous Waste Operation and Emergency Response" guidelines (29 CFR 1910.120) and the California Occupational Safety and Health Administration (Cal/OSHA) "Hazardous Waste Operation and Emergency Response" guidelines (CCR Title 8, section 5192) and implemented prior to initiating field activities. SOMA will notify Underground Service Alert (USA) verifying that excavation areas are clear of underground

utilities. Utility companies will be notified for any utility that may be impacted or located near the excavation work.

### ***Excavation Procedures***

Throughout field activities, SOMA will ensure that all applicable municipal code and best management practices and standards are followed.

- 1) A competent person trained to identify hazardous conditions, with authority to take corrective action, will be in charge of excavation. This person will inspect excavations daily and after every rain event, and ensure that all equipment and materials are in good, working condition.
- 2) Stockpiles of topsoil materials will not be placed within a public right of way, will not obstruct drainage ways, will not be subject to erosion, will not endanger other properties, and will not create a public nuisance or safety hazard. Any catch basin will be protected by silt fencing or other erosion-sedimentation prevention devices at all times. Erosion control devices will not be moved or modified without approval of the project manager
- 3) To ensure a safe working environment, any excavation deeper than 5 feet bgs will be sloped to comply with Cal/OSHA requirements.
- 4) Excavated material and the excavation pit will be monitored by hand-held screening instrumentation, (e.g., photoionization detector [PID]), as well as visual and olfactory indications of soil impact from PHCs (e.g., visible green or gray staining, odor). Observations will be noted on field notes. Excavation activities will be documented by photographs that will be included in the excavation report.

### ***Confirmation Soil Sampling***

PID readings will be utilized to guide the progress of remedial excavation. Once it appears that the majority of contamination has been removed, SOMA will conduct confirmation soil sampling and backfilling activities.

Soil samples will be collected from the bottom and sidewalls of the excavation for analysis at a state-licensed off-site laboratory. SOMA will collect confirmation soil samples from the bottom of the excavation (minimum one sample from 20 x 20 square foot area) and every 20 linear feet from excavation sidewalls (approximately half-way down) for laboratory analysis.

To minimize volatilization, each soil sample will be collected using a slide hammer and a stainless steel tube. Samples will be sealed, labeled, and placed in a chilled ice chest pending delivery to the off-site laboratory under chain-of-custody protocol. Results of this assessment will be documented in SOMA's

remedial excavation report. Confirmation soil samples will be analyzed for the following:

- TPH-g using EPA Method 8260B
- TPH-d using EPA Method 8015B
- BTEX using EPA Method 8260B

### ***Backfilling and Compaction***

Unless otherwise specified by grading permits, excavated areas will be backfilled with imported drain rock up to the groundwater level, and then backfilled with compacted Class II aggregate base rock (AB) to surface.

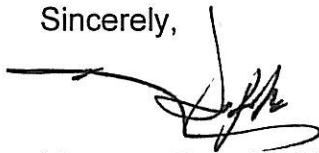
### ***Waste Disposal and Possible Dewatering.***

During excavation activities, any groundwater or rain water accumulating inside the excavation pit, which presents an obstacle to excavation activities, will be extracted and stored onsite in an appropriate storage tank to either be disposed of at an appropriate disposal facility or treated with granulated activated carbon (GAC) and discharged under an appropriate permit to the onsite sewer or storm facilities.

Excavated soil will be disposed of at a suitable disposal facility under appropriate waste manifests. SOMA's final report will document soil and groundwater quantities removed and disposed offsite.

If you have any questions or comments concerning the above activities, please do not hesitate to call me at (925) 734-6400.

Sincerely,

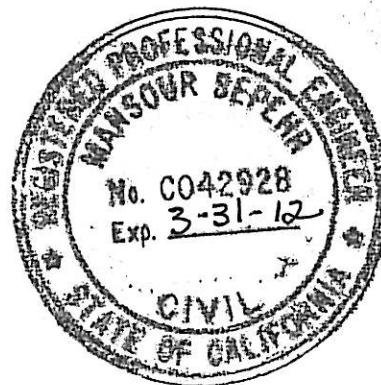


Mansour Sepehr, PhD, PE  
Principal

cc: Mr. Athan Magganas

Attachments:

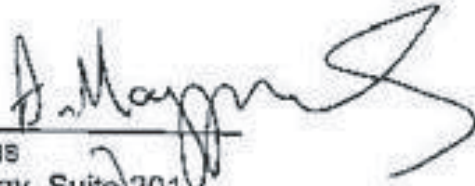
Figure 1: Site Map showing locations of sampling locations, former USTs, and open excavation pit



PERJURY STATEMENT

Site Location: 6501 Shattuck Avenue, Oakland, California

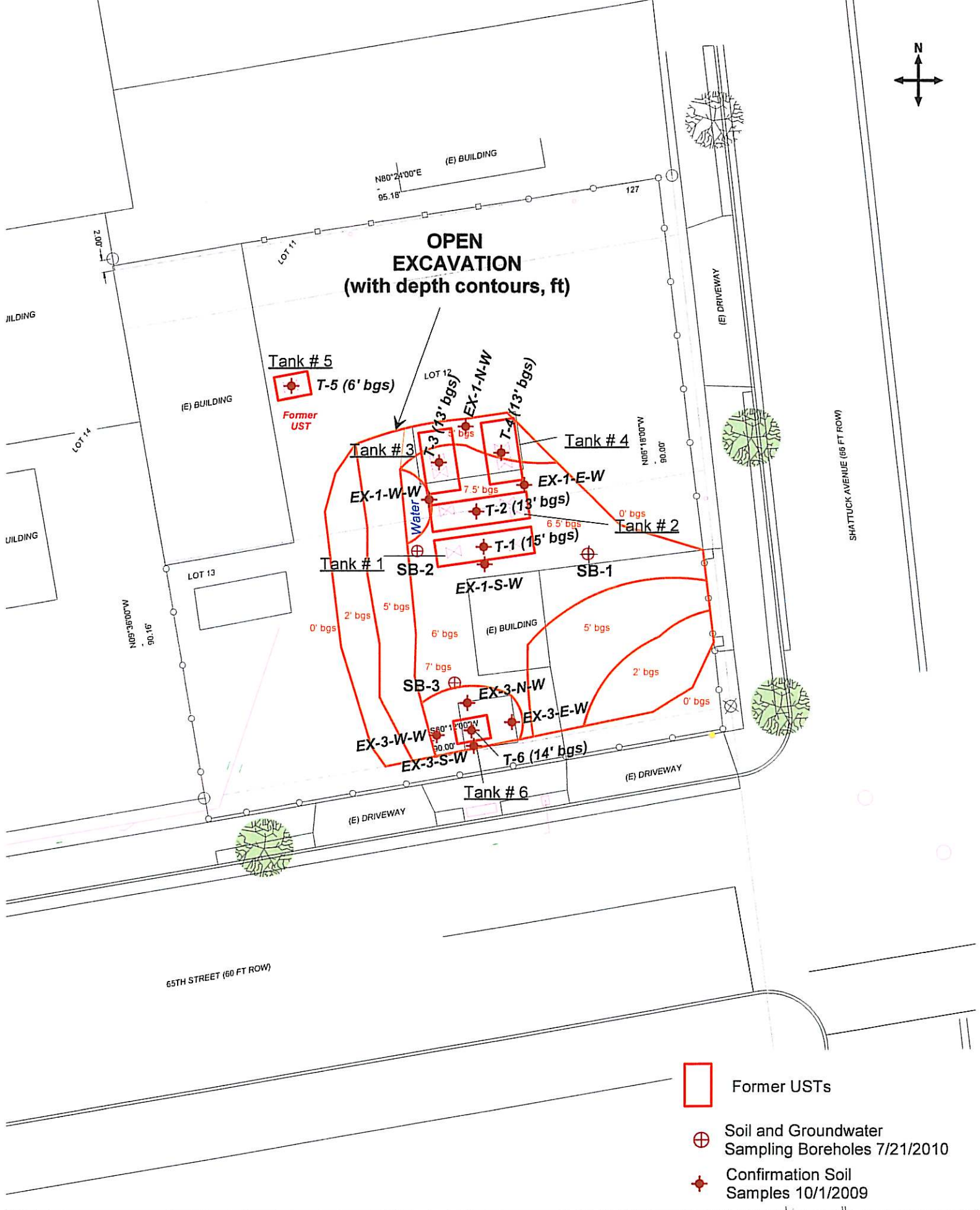
"I declare under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge".



Athan Magganas  
2550 Appian Way, Suite 201  
Pinole, California 94564  
Responsible Party

Manager BAVOER LLC





**OPEN EXCAVATION**  
(with depth contours, ft)

**Tank # 5**  
T-5 (6' bgs)  
Former UST

**Tank # 3**  
T-3 (13' bgs)

**Tank # 4**  
T-4 (13' bgs)

**Tank # 1**  
T-1 (15' bgs)

**Tank # 2**  
T-2 (13' bgs)

**Tank # 6**  
T-6 (14' bgs)

**EX-3-W-W**

**EX-3-S-W**

**EX-3-N-W**

**EX-1-S-W**

**EX-1-W-W**

**EX-1-E-W**

**EX-1-N-W**

**SB-2**

**SB-1**

**SB-3**

**Water**

Former USTs

Soil and Groundwater Sampling Boreholes 7/21/2010

Confirmation Soil Samples 10/1/2009

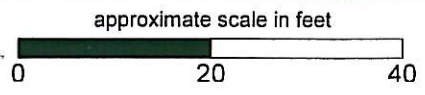


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