LFR ENVIRONMENTAL MANAGEMENT & CONSULTING ENGINEERING

September 14, 2006 001-09359-20

Ms. Barbara Cook, P.E.
Chief, Northern California – Coastal Cleanup
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Subject: Field Sampling Activities, Additional Sample Locations, UC Berkeley Richmond Field Station, Campus Bay, Former Zeneca Facility, Richmond, California

Dear Ms. Cook:

LFR Inc. (LFR) has prepared this letter to summarize the additional field sampling activities required by the Department of Toxic Substances Control (DTSC) at the former Zeneca site, now known as Campus Bay ("the Site"), located at 1391 South 49th Street in Richmond, California. The additional field sampling activities set forth herein were required by the DTSC during a July 13, 2006 meeting held to discuss the preliminary soil and groundwater analytical data collected during the site investigation activities completed from March through June 2006 and submitted to the DTSC in a June 30, 2006 draft data transmittal. LFR will conduct the additional field investigation activities on behalf of Cherokee Simeon Venture I (CSV), Zeneca, Inc., and Bayer CropScience, Inc., collectively known as "the Respondents."

During the July 13, 2006 meeting, the DTSC required Respondents to collect grab groundwater samples on the University of California Richmond Field Station (UC Field Station) property to further characterize the extent of chemicals detected in groundwater samples collected along the Site's western boundary. The DTSC also required collection of one additional shallow groundwater sample in the northwestern portion of Lot 3, one additional shallow groundwater sample in the western portion of Lot 1, and one deep groundwater sample in the eastern portion of Lot 2.

The additional investigation activities will be conducted in accordance with the procedures set forth in the following LFR documents previously approved by the DTSC:

- Revised Quarterly Monitoring, Well Installation/Repair, and Lot 1/Lot 2 Field Sampling and Analysis Plan, Campus Bay Site, Former Zeneca, Inc., Richmond Facility, Richmond, California, dated September 19, 2005 ("the Lots 1 and 2 FSAP");
- Lot 3 Field Sampling and Analysis Plan, Campus Bay Site, Former Zeneca, Inc., Richmond Facility, Richmond, California, dated November 2, 2005 ("the Lot 3 FSAP");

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- Revised Quality Assurance Project Plan Approval, Former Zeneca Property, Campus Bay Site, dated July 18, 2005; and
- Revised Health and Safety Plan, Environmental and Associated Activities, Campus Bay Site, Former Zeneca Inc. Richmond Facility, Richmond, California, dated July 18, 2005.

The following provides the scope of work and rationale for the additional field sampling required by the DTSC.

Scope of Work and Sampling Rationale

UC Field Station

To further characterize the extent of chemicals detected in shallow and deep groundwater along the Site's property boundary within the UC Field Station (the western property boundary), LFR will advance 10 temporary soil borings (UCB-1 through UCB-10) and 2 cone penetration test (CPT) borings (UCB CPT-1 and UCB CPT-2) at the approximate locations illustrated on the attached Figure 1.

LFR has reviewed soil and groundwater data for samples previously collected in the areas to be investigated. The preliminary analytical data was made available to the DTSC and representatives for the University of California. Based on this data, LFR will collect additional groundwater samples to further characterize volatile organic compounds (VOCs) concentrations in groundwater underlying the western property boundary. Based on previous groundwater analytical data, groundwater samples will be collected at proposed sample locations UCB-CPT-2 and UCB-7 to assess the concentration of metals in addition to VOCs in groundwater. Groundwater samples will be submitted to a state-certified analytical laboratory for analysis of VOCs using Environmental Protection Agency (EPA) test method 8260. The grab groundwater samples to be collected from temporary soil borings UCB-7 and UCB CPT-2 will also be analyzed for Title 22 metals using 6000/7000 Series Methods. Groundwater samples collected for Title 22 metals will be field filtered prior to preservation by the laboratory in accordance with the Lot 1 and 2 FSAP and Lot 3 FSAP.

The temporary soil borings will be advanced to approximately 20 feet below ground surface (bgs) for the purpose of collecting shallow grab groundwater samples. Temporary soil borings will be advanced using direct push technology and will be cored continuously, if feasible, for lithologic identification. Soil cores will be screened for visible or olfactory indications of chemically-affected soils (e.g., cinder material or staining). Soil screening will be supplemented with a portable photoionization detector (PID) to monitor the presence and concentrations of organic vapors in the borings. The lithology of the soil will be described using the Unified Soil Classification System and recorded onto field boring logs. The PID readings will also be recorded onto the field boring logs. Soil borings will be advanced and the lithologic information will be recorded under the direction of an LFR California Professional Geologist.

At each temporary soil boring, one grab groundwater sample will be collected at a depth interval of approximately 10 to 20 feet bgs. At each CPT location, a borehole will be advanced to approximately 60 feet bgs to collect lithologic information. The lithologic data generated from the CPT instrumented probe will be reviewed to identify changes in subsurface lithology and aid in identifying an appropriate water-bearing zone in which to collect grab groundwater samples. At each CPT location, one shallow grab groundwater sample will be collected from a depth interval of approximately 10 to 20 feet bgs. The lithology will be assessed to identify a second water-bearing zone deeper than 20 feet bgs. A grab groundwater sample will then be collected from this deeper water-bearing zone.

Campus Bay Site

Following its review of the preliminary groundwater analytical data collected at the Site in 2006, the DTSC required collection of an additional shallow grab groundwater sample in the vicinity of previous sample location Lot 3-51 (Lot 3-55; Figure 1). At previous sample location Lot 3-CPT-1 (Figure 1) trichloroethene (TCE) was reported at a concentration of 340 micrograms per liter (μg/l) in a grab groundwater sample collected at approximately 36.5 feet bgs. Therefore, the purpose of proposed sample location Lot 3-55 will be to investigate whether there is a higher concentration of VOCs in the shallow groundwater upgradient from Lot 3-CPT-1. In addition, at previous sample location Lot 1-CPT-2, TCE was detected at a concentration of 400μg/l in a groundwater sample collected at approximately 25 feet bgs. Based on this analytical result, to assess VOC concentrations in shallow groundwater at this location the DTSC has required an additional shallow groundwater sample (Lot 1-39; Figure 1) to be collected at previous sample location Lot 1-CPT-2. The methods used to advance these borings and collect groundwater samples from Lot 3-55 and Lot 1-39 will be the same as those described above for the investigation to be conducted on the UC Field Station property.

Based on the groundwater analytical data collected at the Site in 2006, the DTSC also required additional characterization of VOCs detected in groundwater in the vicinity of previous sample location Lot 2-27. Therefore, a CPT boring will be advanced near MW-31 to an approximate depth of 60 feet bgs (Lot 2-CPT-9). The lithologic data generated from the CPT instrumented probe will be reviewed to identify changes in subsurface lithology and aid in identifying an appropriate water-bearing zone to collect a lower horizon grab groundwater sample. The grab groundwater sample will be collected from the first water-bearing zone identified deeper than 20 feet bgs.

The grab groundwater samples collected from the Site will be submitted to a state-certified analytical laboratory for VOC analysis using EPA test method 8260.

Waste Management

In accordance with the Lot 1 and 2 FSAP and the Lot 3 FSAP, soils generated during the investigation will be placed into 55-gallon drums. In accordance with University of California requirements provided in the property access agreement, the drums will be removed from the UC

Field Station daily with temporary staging at the Campus Bay facility within the waste staging area illustrated on the attached Figure 1.

LFR has tentatively scheduled the above scope of work for the week of September 25, 2006. Completion of these field sampling activities by that time is contingent upon reaching an agreement on site access between the Respondents and the Regents of the University of California. If you have any questions regarding the information provided above, please do not hesitate to call either of the undersigned at (510) 652-4500.

Sincerely,

Andrew M. Romolo, P.G. (8110)
Senior Geologist

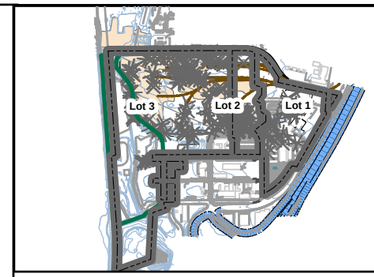
William L. Carson. P.E. (C60735)
Principal Engineer

Attachment: Figure 1: Proposed Additional Sampling Locations

cc: Ms. Lynn Nakashima, DTSC
Mr. Doug Mosteller, Cherokee Investment Partners
Ms. Susan Cronk, Simeon Commercial Properties
Mr. Brian Spiller, Zeneca Inc.
Ms. Michelle King, EKI
Mr. John Edgcomb, Esq
Mr. Bill Wick, Esq.
Mr. Jeff R. Keohane, Esq.

USB CPT-1 Proposed CPT (upper and lower horizons for VOC analysis)

UCB-3 Proposed Geoprobe /Hydropunch (for VOC analysis)



LEGEND

- Lot 1-11 — Location of soil boring
- Lot 1-1 — Location of soil boring w/ grab groundwater sample
- Lot 1 CPT-1 — Location of cone penetrometer test boring with groundwater sample(s)
- HF-1** — Grab groundwater samples collected by representatives retained by the Department of Toxic Substances Control, December 2005 - January 2006
- Process Water Supply-1 — Process Water Supply Well (not in use)
- MW-1 — Location of monitoring well
- P-1 s/d — Location of piezometer (shallow and deep)
- SGT-1 — Location of soil gas point
- SG-1 — Location of soil gas monitoring well
- Railroad spurs removed
- Lot 1, 2, and 3 Boundary
- Arsenic_Excavation
- Excavation Area
- Habitat Enhancement Area Boundary
- Property boundary
- Building
- Road
- Building removed
- 2-ft contour interval

100 0 100 200 Feet

Proposed Additional Sampling Locations

Campus Bay, Richmond, California

LFR

Figure 1

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