

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 13, 2007

Port of Oakland
Mr. John Prall
530 Water Street, 4th floor
Oakland, CA 94607-3524

Subject: Fuel Leak Case No. RO000019 (Global ID # T0600101102), Port of Oakland, 801
Maritime Street, Oakland CA

Dear Mr. Prall:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "Work Plan for Additional Site Investigation," and "Additional Site Investigation", dated February 27, 2007 and August 27, 2007. Results from the recent soil and groundwater investigation detected low levels of contamination in soil at concentrations of up to 36 ppm TPHg and 150 ppm TPHd. Additionally, low levels of dissolved phase petroleum hydrocarbon contamination was detected in groundwater at concentrations of up to 73 ppb, 57 ppb and 4 ppb TPHg, TPHd and MtBE respectively. The Port of Oakland has also recommended the installation of two additional groundwater monitoring wells. Prior to the installation of monitoring wells, additional characterization in the source area is required.

ACEH is concerned that no soil analytical data has been collected in the source area below 9.5 feet bgs. However, soil data collected during the UST removal detected TPHd concentrations of up to 3,600 ppm at 9.5 feet bgs. Currently, the vertical extent of contamination in the source area beneath your site is undefined.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Source Area Characterization.** Currently, the vertical extent of contamination in the source area is undefined. Residual contamination beneath the former USTs was detected at 9.5 feet bgs, which was the maximum depth of the excavation. The purpose of contaminant source characterization is to determine the nature and extent of petroleum impacted soils (residual phase), and hydrocarbons dissolved in groundwater (aqueous phase). Please provide your proposal for source area characterization in the work plan requested below. Report the results of your work in the Soil and Water Investigation Report requested below.
2. **Soil Borings RM-1 through RM-10.** The investigation completed in August 2007 collected soil and groundwater data to a maximum depth of 11 feet bgs. Groundwater elevation

fluctuations could have resulted in the distribution of contamination in soil below the water table, resulting in soil contamination below the maximum depth explored during the investigation. Additional soil sampling below 11 feet is essential to determine the vertical distribution of residual contamination in soil. Please propose additional soil boring locations immediately downgradient of the source area in the work plan requested below.

3. **Soil Sampling and Analysis.** ACEH requests soil samples be collected from soil borings at changes in lithology, areas of obvious hydrocarbon contamination or when elevated PID readings occurs. If no changes in lithology, obvious contamination or elevated PID reading occurs, soil samples shall be collected at the capillary fringe and approximately 5 feet interval until the total depth of 25 feet bgs has been reached. Soil samples collected below 20 feet should be placed on laboratory hold pending results from the overlying sample. All soil samples are to be submitted for the following laboratory analysis; TPHg, TPHd, BTEX and MtBE. Please present results from soil sampling in the Soil and Groundwater Investigation Report requested below.
4. **Groundwater Sampling and Analysis.** The water samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260. Please present the results from groundwater sampling in the Soil and Groundwater Investigation Report requested below.
5. **Hydrogeologic Cross Sections.** Please incorporate historical soil boring and monitoring well data including soil and groundwater analytical data, static water level and first water encountered, well screen interval, distinct geologic contacts and the location of former UST tank pit and appurtenance into a minimum of two cross sections that are parallel and perpendicular to groundwater flow. Please present the cross sections in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Steve Plunkett), according to the following schedule:

- **January 15, 2008** – Work Plan
- **April 15, 2008** – Soil and Groundwater Investigation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the

attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "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." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please feel free to call me at (510) 383-1767.

John Prall
December 12, 2007
Page 4

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Plunkett", with a long horizontal stroke extending to the right.

Steven Plunkett
Hazardous Materials Specialist

cc: Masood Ghassemi
R & M Environmental and Infrastructure Engineering, Inc.
7996 Capwell Drive
Oakland, Ca 94612-2015

Donna Drogos, ACEH, Steven Plunkett, ACEH, File