

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

July 28, 2008

Port of Oakland  
Mr. John Prall  
530 Water Street, 4<sup>th</sup> 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 document entitled, "Response to Comments," received February 11, 2008. As stated previously in a correspondence from ACEH dated March 2006, the limits of soil contamination were unable to be determined after the UST removal. Residual contamination in soil boring B-2 and C-2 detected TPHd at concentrations up to 3,600 ppm and 1,600 ppm, at 9.5 feet bgs. Therefore, ACEH requests that additional soil samples be collected in the source area to define the vertical extent of contamination in the source area.

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](mailto: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). We request that one soil boring be installed between B-2 and C-2 to a depth of 15 feet bgs and soil and samples must be collected at five foot intervals until the total depth of 15 feet.
- 2. Soil and Groundwater Plume Definition.** ACEH agrees that supplemental soil and groundwater data downgradient of RM-5 will be useful to help define the downgradient extent of the dissolved phase contamination plume. We concur with the Port's recommendation to install four soil borings downgradient of RM-5. Report the results of your work in the Soil and Water Investigation Report requested below.
- 3. Soil Sampling and Analysis.** ACEH requests soil samples be collected from all 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 5 feet interval until the total depth of 15 feet bgs has been reached. 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:

- **September 28, 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) require submission of reports in electronic form. The electronic copy replaces paper copies 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 all 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, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

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

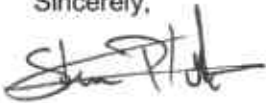
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist



Donna Drogos, PE  
Supervising Hazardous Materials Specialist

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