



# PORT OF OAKLAND

June 9, 1994

Ms. Jennifer Eberle  
Hazardous Materials Specialist  
Hazardous Materials Division  
Alameda County Health  
Care Services Agency  
80 Swan Way, Rm 200  
Oakland, CA 94621

**Subject:** *Response to Comments Regarding Work Plan for Additional Site Investigation Activities at 801 Maritime Street, Oakland, CA 94607*

Dear Ms. Eberle:

Enclosed, you will find a copy of the Response to Comments Regarding Work Plan for Additional Site Investigation Activities at 801 Maritime Street, Port of Oakland, Oakland, California. The letter of response was prepared by our consultant ERM West. The work plan addressed the installation and monitoring of one well at the former tank site. The Port and its consultant ERM West believes that one well is adequate because of the extensive amount of groundwater data collected from the adjacent down gradient site (the former Ashland Oil and Mobil Oil Sites).

We understand that the ACDEH prefers three wells in order to determine groundwater direction. In this case there are a sufficient number of nearby wells (approximately 35) that additional wells are not necessary. Please review the enclosed response and notify the Port as soon as possible if you feel the letter addresses your concerns.

Please call me at 272-1184 if you have any questions or comments.

Sincerely,

Jon Amdur  
Port Environmental Scientist

CC: Neil Werner (Environmental Department)

Files

enclosure

ALCO  
HAZMAT  
91 JUN 10 PM 12:11

June 7, 1994

Mr. Jon Amdur  
Port of Oakland  
530 Water Street  
Oakland, CA 94607

Subject: Response to Comments  
Regarding 801 Maritime Street  
Oakland, California



Dear Mr. Amdur:

This letter addresses comments received from Ms. Jennifer Eberle, Alameda County, Health Care Services, Department of Environmental Health regarding a workplan previously submitted for the 801 Maritime site. Presented below are the verbatim comments in italics followed by ERM-West's response.

*1) Preliminary Remediation Goals (PRGs) are designed for Superfund sites, and are therefore not appropriate for this site (page 2).*

PRGs provide a conservative health-risk-based screening mechanism for determining whether additional investigation may be required. Thus, while the 801 Maritime Street site is not a Superfund site, using PRGs in the way they are intended (i.e., as screening criteria) ensures that conditions at the site are subjected to as high a level of protection as a Superfund site. It should be noted that EPA uses conservative assumptions in developing PRGs, and that PRGs are not cleanup levels; cleanup levels are frequently higher than PRGs because PRGs are so conservative. ERM believes that it is entirely appropriate to use health-based screening criteria to assess whether a potential concern exists at this site.

*2) Since you propose one well based on groundwater flow direction from the nearby Mobil Oil site, please submit a map showing the location of the Mobil Oil site (and its wells) in relation to the 801 Maritime St. site (page 3).*

A map is enclosed.

*3) Please specify what the groundwater direction at the Mobile site is, in terms of N, S, E, and W. The past two quarterly reports indicate a variable flow direction (Alisto, April and January 1994) (page 3).*

*I disagree -  
must use  
environmental  
values  
also*

Mr. Jon Amdur  
June 7, 1994

Page 2

The overall groundwater flow direction is from the land toward the outer harbor. The groundwater maps show, however, variability due to tidal influence from the harbor that lies adjacent to the Mobil Oil site. *ok*

4) A minimum of 72 hours should lapse between well installation and development, as per 23 CCR Div. 3, Chapter 16, Section 2649 (d) (8) (page 4). ~~the new section is~~

Assuming the top of the monitoring well screen will be approximately 5 feet below the ground surface, the sand pack will extend approximately 2 feet above the top of the well screen, a bentonite pellet layer will be approximately 2 feet in thickness, and the grout seal will be approximately 1 foot in thickness. It seems unnecessary to wait for a minimum of 72 hours to expire for a 1 foot layer of cement-bentonite grout to set. *how long then? immediately*

5) Soil and groundwater samples should be analyzed for TPH-g, TPH-d, and BTEX (page 4).

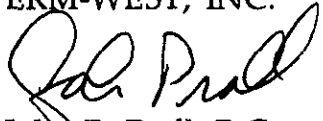
The analyses were specified in the proposed workplan under the subsection titled Laboratory Analyses. For clarification, the EPA Method 8015-M will include characterization as gasoline and diesel fuels. *ok*

6) Soil cuttings and purge/development water should be properly characterized and disposed, not left on site indefinitely.

The intent was not to leave the cuttings and purge water on site indefinitely. The disposal of these items has been the responsibility of the Port of Oakland. *ok*

If you have any questions regarding these responses, please do not hesitate to contact the undersigned.

ERM-WEST, INC.



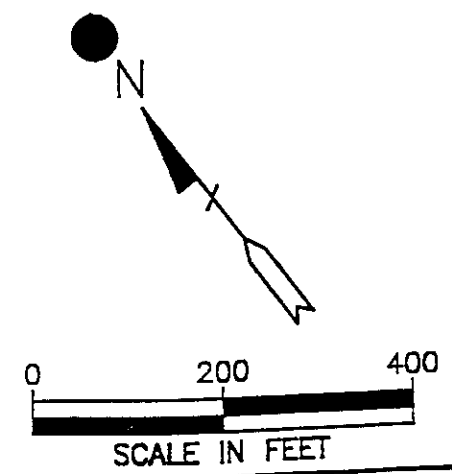
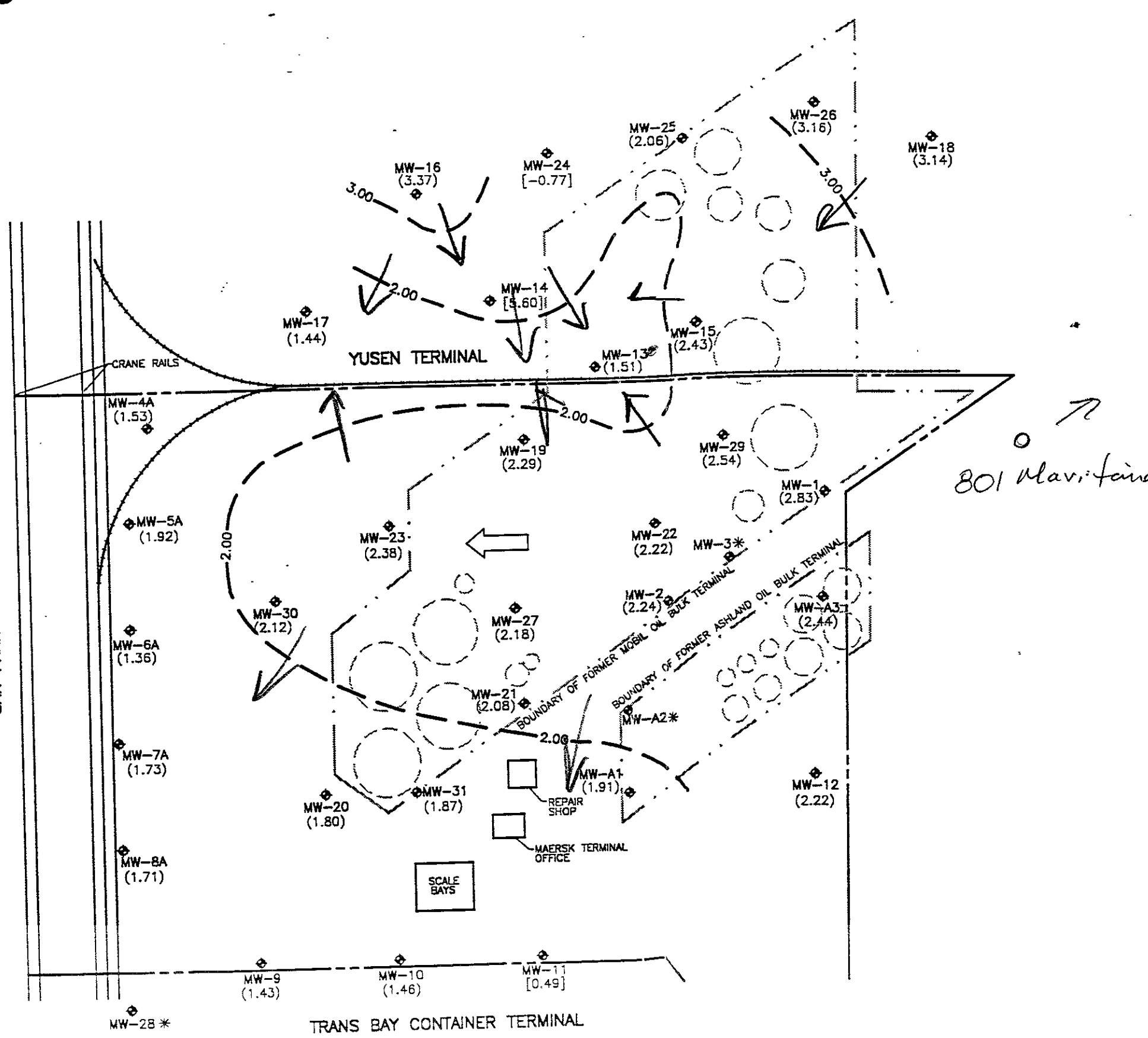
John R. Prall, R.G.  
Senior Geologist

JRP/SMvR/jrp/2162.13

Enclosure noted



SAN FRANCISCO BAY

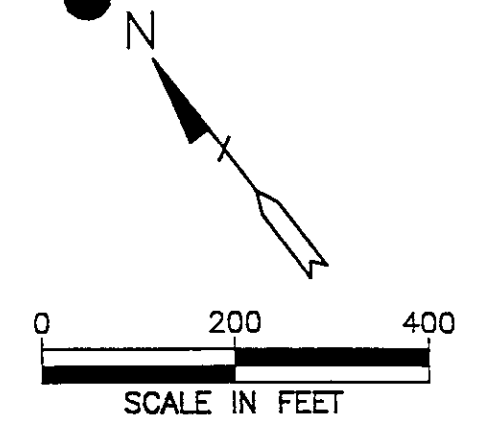
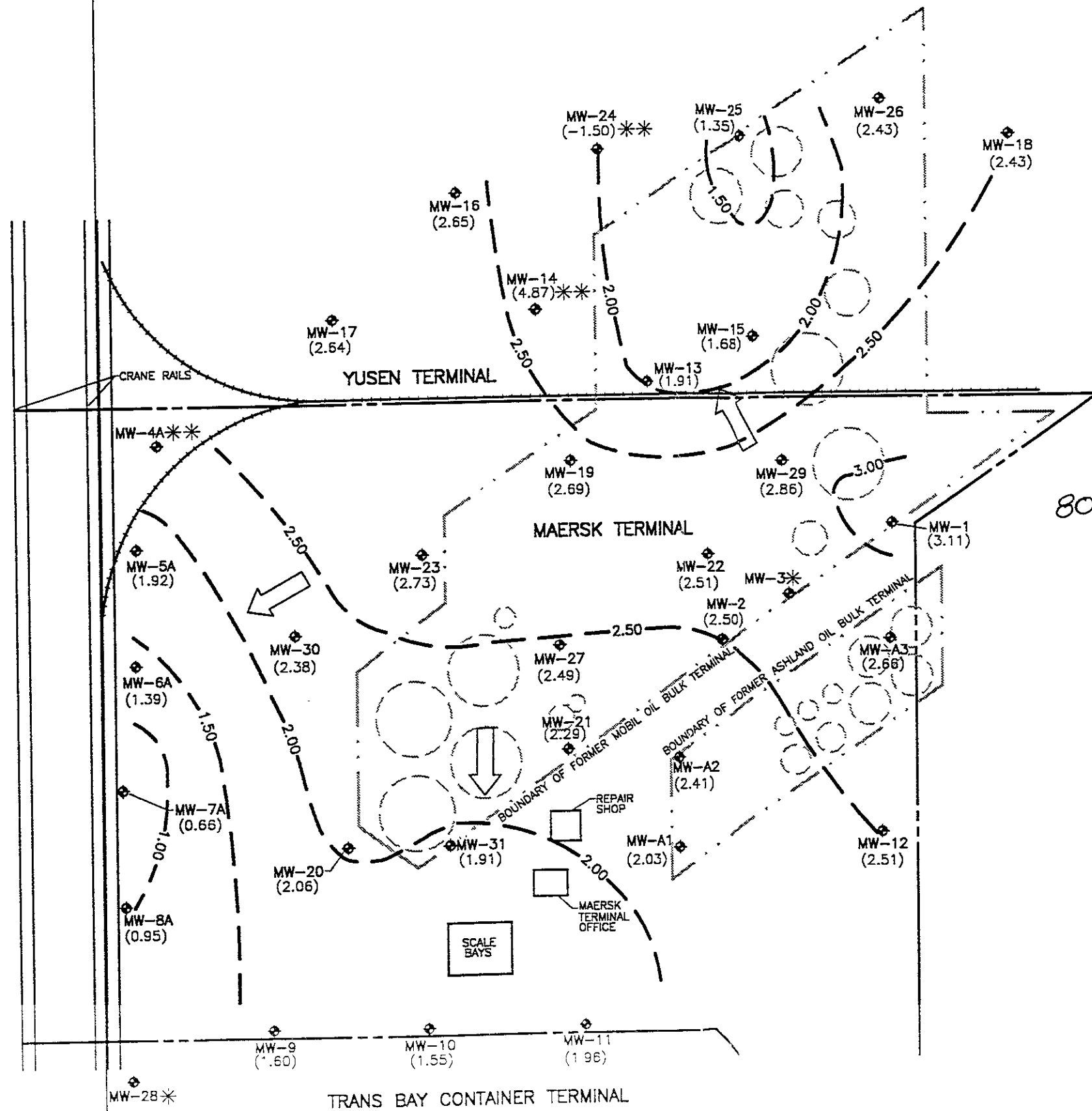


- LEGEND**
- ◆ GROUNDWATER MONITORING WELL
  - FORMER ABOVE GROUND PRODUCT STORAGE TANK
  - (3.14) GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL
  - 3.00 - GROUNDWATER ELEVATION CONTOUR IN FEET ABOVE MEAN SEA LEVEL (CONTOUR INTERVAL - 1.00 FOOT)
  - ← GROUNDWATER GRADIENT DIRECTION
  - [0.49] ANOMALOUS DATA NOT USED IN PREPARING CONTOURS
  - \* WELL INACCESSIBLE

**FIGURE 2**  
**POTENTIOMETRIC GROUNDWATER ELEVATION CONTOUR MAP**  
**DECEMBER 7, 1993**  
 FORMER MOBIL OIL BULK PLANT  
 PORT OF OAKLAND  
 OAKLAND, CALIFORNIA  
 PROJECT NO. 10-098

100881-11 DMC 1-18-84 REV 1-200

SAN FRANCISCO BAY



- LEGEND**
- ◆ GROUNDWATER MONITORING WELL
  - FORMER ABOVEGROUND PRODUCT STORAGE TANK
  - (2.43) GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL
  - 2.00 - GROUNDWATER ELEVATION CONTOUR IN FEET ABOVE MEAN SEA LEVEL (CONTOUR INTERVAL - 0.50 FOOT)
  - ← INTERPRETED GROUNDWATER GRADIENT DIRECTION
  - \* WELL INACCESSIBLE
  - \*\* ANOMALOUS DATA NOT USED IN PREPARING CONTOURS

**FIGURE 2**  
**POTENTIOMETRIC GROUNDWATER ELEVATION CONTOUR MAP**  
**MARCH 2, 1994**  
 FORMER MOBIL OIL BULK TERMINAL  
 909 FERRY STREET  
 OAKLAND, CALIFORNIA  
 PROJECT NO. 10-098

100800-10W2 4-20-94 RHW 11-200