

Plunkett, Steven, Env. Health

From: Yane Nordhav [yane@baseline-env.com]
Sent: Friday, October 17, 2008 2:27 PM
To: Plunkett, Steven, Env. Health
Cc: jrubin@portoakland.com; Jim McCarty
Subject: Harbor Facilities Meeting, Port of Oakland, 10/15/08

Steven.

The Port requested that we summarize our discussions during the 15 October 2008 meeting at Harbor Facilities with you, Jeff Rubin (Port), Jim McCarty (BASELINE), and myself. The meeting was prompted by the 30 September 2008 letter from you to the Port requesting additional work at the site.

The 30 September 2008 letter approved the installation of four monitoring wells, proposed by the Port in a 31 January 2007 workplan, with certain conditions. The 30 September 2008 letter also requested that the Port provide a Conceptual Site Model, identification of data gaps, recommendations for filling in data gaps through additional investigations, presentation of the geologic and hydrologic regimes (including flow patterns and vertical groundwater gradients), temporal changes in plume geometry, definition of cleanup levels and cleanup goals, and the time frame for reaching the goals.

In our meeting on 15 October 2008, the Port discussed that the site has been exhaustively characterized and that a conceptual site model has previously been developed in association with a risk assessment, prepared by IRIS in 2002; and that the risk assessment identified risks at the site to indoor air.

We discussed that it was unlikely that cleanup goals (e.g., ESLs) would be reached in the plume area in the short-term. The Port goal is to achieve closure at the site, but in the absence of eliminating free product in the short-term, the Port would be interested in managing the site from a risk perspective.

To that end, the Port has previously prepared a draft deed restriction at the site (the draft has already been submitted to the County for review); the Port is committed to preparing a risk management plan with a health and safety plan; and the Port will be conducting another year of monitoring and adjusting the treatment system operations. At that time, the Port would be evaluating the possibility of turning the treatment system off and implementing institutional and engineering controls to manage the site, assuming that the water quality in new wells were consistent with the existing monitoring well network data (showing no exceedances of ESLs for groundwater that is not a drinking water source), thus demonstrating that the product plume is stable and that there is no off-site migration of contaminants above ESLs.

You indicated that closure would be unlikely with the presence of free product, but that engineering and institutional controls could possibly be a way of managing the site.

The Port committed to address the County's request for technical studies (as requested in the 30 September 2008 letter) in the next report (March 2008) and demonstrate that what the County has requested in the 30 September 2008 letter has generally been already addressed in previous reports. You indicated that if we could show that your concerns, as expressed in the 30 September 2008 letter had already been covered, the County would be willing to consider our request for managing the site based on engineering and institutional controls.

We also discussed the deadlines identified in the 30 September 2008 letter for various submittals and suggested some revisions to those deadlines; the Port's requested changes were submitted to the you in an email on 16 October 2008 from Jeff Rubin.

Next Steps:

1. Install 4 new monitoring wells in November/December 2008.
2. Perform semi-annual groundwater monitoring including the four new wells, in November/December 2008.
3. Adjust treatment system operations (evaluate effects of shutting down system for an extending period to see groundwater/product response) and start pumping product from MW-3 on a regular schedule.
4. Finalize a risk management plan for inclusion in the March 2009 submittal to the County. That report would include discussion of the points in the 30 September 2008 County letter and present the actions for 2009 that would potentially lead to shutting down the system at the end of 2009 or beginning of 2010.

If you have any additions or deletions to this summary, please feel free to edit. We look forward to moving forward on this site with with you.

Yane