PENSKE

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By Alameda County Environmental Health 1:38 pm, Jul 20, 2017

July 20, 2017

Ms. Karel Detterman
Hazardous Materials Specialist
Alameda County Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502

Re: Technical Review of Scoping Ecological Risk Assessment
Former Penske Truck Leasing Facility
725 Julie Ann Way, Oakland, California
Alameda County Site ID R00000354
Stantec PN: 185702640.200.0003

Dear Ms. Detterman:

Enclosed with this cover letter is the Technical Review of Scoping Ecological Risk Assessment prepared by AECOM for the above-referenced former Penske Truck Leasing location.

As an authorized representative of Penske Truck Leasing Co, LP, I offer the following statement:

> I, Chris Hawk, declare, under penalty of perjury, that the information and/or recommendations contained in the enclosed Report are true and correct to the best of my knowledge

Should you have any questions, please contact me at 610-775-6123.

Best Regards,

Chris Hawk
Environmental Engineer

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VIA EMAIL TO christopher.hawk@penske.com

Christoper Hawk
Environmental Engineer
Penske Truck Leasing Co., L.P.
PO Box 7635
Reading, PA 19603

July 10, 2017

Subject: Technical Review of *Scoping Ecological Risk Assessment for the Penske Site at 725 Julie Ann Way Oakland, California* (Stantec 2016), Alameda County Site ID R00000354

Dear Mr. Hawk,

AECOM Technical Services Inc. (AECOM) is pleased to submit technical comments on the *Scoping Ecological Risk Assessment for the Penske Site at 725 Julie Ann Way Oakland, California* prepared by Stantec and dated December 1, 2016. This ecological risk assessment (ERA) was prepared in accordance with state guidance to evaluate the potential for adverse effects to upland and aquatic organisms from petroleum-related chemicals released from the Penske site in Oakland. The ERA report contains an ecological scoping assessment, which is the first phase in the ERA process and answers the question as to whether or not potentially completed ecological exposure pathways are present at a site. Since potentially complete ecological exposure pathways were identified, the ERA report also includes elements of the next phase of the ERA process by providing a screening-level assessment of the available soil and groundwater data.

General Comments

1. Overall, the report is well written and provides all of the components of a Scoping ERA. The evaluation is thorough and addresses both potential on-site and off-site ecological exposure pathways. Comments on the report are provided as tracked changes in the MSWord version of the text, and most serve to clarify or strengthen statements and concepts conveyed.

2. Clarification is needed regarding the potential for site groundwater COPEC transport to Seminary Creek either through direct discharge of site groundwater to the creek or via the unnamed drainage ditch at low tide (water from the ditch could come in contact with exposed sediments or mudflats in the creek).

3. Comparison of the soil and groundwater data against the San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) is difficult to follow in the text due to the lack of tables or figures to accompany this comparison. Please include figures and/or tables that show actual comparisons of the data against the ESLs, locations with exceedances, and the magnitude of these exceedances.

Specific Comments

4. **Section 1.3, last paragraph.** Were the samples analyzed with or without Silica Gel Cleanup (SGC)? If SGC was not used, please mention it and note that is consistent with current ESL recommendations from the Water Board. If SGC was used, please note whether there were paired SGC and non-SGC data or perhaps note that the proposed analytical methods were approved by ACEH in the work plan.
5. **Section 3.2.1, Table 3 (On-Site Field Water Quality).** What do these water quality parameters indicate in terms of habitat conditions and suitability for aquatic life?

6. **Section 3.2.1, last paragraph.** Please note whether or not any bird species have been observed in the drainage ditch. Also, based on the description in this paragraph, it sounds like Seminary Creek could also provide an invertebrate prey base for birds. Please verify if any birds have been observed foraging in the creek.
7. **Section 4.1.** Please define "Primary Uptake Route" and "Secondary Uptake Route" in the context of the CSM. Are these terms analogous to "potentially complete and significant" and "potentially complete but minor" such that only primary uptake routes (potentially complete and significant pathways) would be included in the quantitative screening assessment?
8. **Section 4.1.1, last bullet.** Sediment and porewater are shown as exposure media on Figure 11. Why are exposure pathways for sediment shown as secondary uptake routes? Under the assumption that aquatic invertebrates are primarily exposed to contaminants in the water column and benthic invertebrates are primarily exposed to contaminants in sediment porewater, should benthic invertebrates be added to the ecological receptors and pathways for sediment porewater be shown as potentially complete? If this is an accurate portrayal of site conditions, screening levels for surface water can also be used to evaluate the potential for ecological hazard to benthos exposed to porewater.
9. **Section 4.1.2.** Should this also say "and Seminary Creek"? Should this paragraph and Figure 11 (CSM) indicate potentially complete pathways for both the drainage channel and Seminary Creek? Please clarify whether or not Seminary Creek is included in the CSM. It is not clear whether the presence of the flap gate is interpreted as preventing transport of site COPECs from the ditch to the Creek, or if site groundwater could be directly released into Seminary Creek.
10. **Section 4.1.2.** For aquatic invertebrates, dermal contact with surface water is a primary uptake route that is reflected in the surface water screening criteria. Given the types of contaminants present (TPH) and the community level receptors potentially present (i.e., lower trophic level receptors), prey ingestion would likely be an insignificant pathway. Please add a short discussion of the bioaccumulation potential for petroleum-related contaminants. This discussion will also further address the reason exposure by aquatic-dependent birds via ingestion of aquatic or benthic invertebrates is not shown on the CSM.
11. **Section 4.2, first paragraph.** Please add text to describe the basis of these soil leaching ESLs and the uncertainty with using them to predict risk to aquatic receptors. Are they likely to over- or under-predict risk for the site-specific COPECs?
12. **Section 4.2, second paragraph.** Maximum concentrations of benzene in 4.5-6.5 ft bgs and 7.5-9 ft bgs soils are higher than the soil ESLs by 96 times and 56 times, respectively. Please add this finding and associated discussion. How are these notable exceedances interpreted for eco risk? (Note: benzene detected in shallow groundwater is below both freshwater and saltwater ESLs.)
13. **Section 4.2, third paragraph.** Given the variability in the salinity measurements shown in Table 3 (4.6 ppt to 29.5 ppt), agree with using both freshwater and saltwater ESLs, but do not necessarily agree with emphasis on freshwater values. The low tide salinity measurement of 4.6 ppt is the only measurement below 20 ppt (remaining 3 measurements are 24 ppt and greater).
    The *San Francisco Basin Water Quality Control Plan* (Basin Plan) (RWQCB 2015) provides the following definitions based on salinity content:

    - Freshwater: salinity level ≤1 parts per trillion (ppt)
    - Estuarine: salinity level between 1 ppt and 10 ppt
    - Marine: salinity level >10 ppt

    Under these definitions, surface water of the drainage channel and Seminary Creek may be considered more marine than estuarine or freshwater. We agree with using the lower of the two screening levels (freshwater and saltwater) for these habitats.
14. **Section 4.2, Table 6.** For completeness, please provide ESLs for acetone, TCE, and tert-butyl alcohol to compare to the groundwater concentrations shown in Table 1. Maximum detections of these COPECs in shallow groundwater are below the ESLs.
15. **Section 4.2, last paragraph.** Please add text to interpret the meaning of these exceedances – e.g., VOCs like benzene are not expected to persist in surface water, reducing the potential for exposure. Also add text to interpret risks to TPHg and TPHd using chemical indicator approach – e.g., few exceedances of ESLs for chemical indicators (toxic components of TPH mixtures, i.e.,

VOCs and PAHs) supports idea that TPH-related risk may be over-estimated based on TPH ESL exceedances alone.

16. **Section 4.2, last two paragraphs.** Please rectify the counts of exceedances of the ESLs (see embedded comments). For example, looking at Appendix B, AECOM did not see any exceedances of the groundwater ESLs for benzene and naphthalene. However, maximum concentrations of fluorene (shallow gw) and toluene (deep gw) exceed the freshwater ESLs (assuming 190 ug/L is the maximum/only detection of toluene – Table 1 shows max cell as blank). Please discuss.
17. **Section 4.3, second bullet.** Please add text regarding outcome of screening assessment for TPH and chemical indicators.
18. **Section 4.3, third bullet.** What about direct groundwater discharge to Seminary Creek?

We agree with the overall findings of the Scoping Assessment that there are no potentially complete pathways in the terrestrial portion of the site, and although potentially complete pathways may exist via shallow site groundwater discharge to the aquatic habitats that border the site, these pathways may also be insignificant. However, tables and/or figures are needed to better understand the outcome of the screening comparison to ESLs, i.e., COPECs in exceedance of ESLs, locations of exceedances, and magnitude of exceedances. In addition, documentation of the absence of bird foraging observed in these aquatic habitats and minimal presence of a viable benthic community, as well as the lack of bioaccumulative COPECs, will strengthen the conclusions made regarding the lack of potentially complete and significant exposure pathways for Seminary Creek and the drainage ditch.

Thank you for the opportunity to review this report. If you have any questions regarding our comments, please contact Usha Vedagiri at (510) 874-3123 or Heather Loso at (727) 258-7540.

Yours sincerely,

AECOM Technical Services, Inc.

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Attachments

Electronic copy of tracked changes and comments made on MSWord version of text