

Nowell, Keith, Env. Health

To: 'Douglas Herman'; Diane Heinze
Cc: Lydia Huang; Roe, Dilan, Env. Health
Subject: Site Cleanup Program Case RO414 - MOIA, United Airlines MF35/36, 1100 Airport Drive, Oakland CA

Dear Mr. Herman and Ms. Heinze,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Technical Memorandum* dated February 7, 2014, which was prepared by Baseline Environmental Consulting for the subject site. The Technical Memorandum was prepared to address concerns expressed by ACEH regarding file review for case closure. Based on ACEHs review, the case appears to meet closure requirements under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) although elevated dissolved metals concentrations are present in groundwater beneath the site, the northern-most groundwater monitoring well demonstrates the metals may not be affecting the nearest storm water drainage ditches located north of the MOIA, United Airlines (MOIA-UA) site.

Item 4 of the Technical Memorandum addressed updating the San Francisco Bay Regional Water Quality Control Board (SFRWQCB) Environmental Screening Levels (ESLs) to current values. The previous ESLs used for the Tier 2 screening by URS in their October 31, 2012 report entitled *Closure Documentation for the Former Oakland Maintenance Center* (OMC) prepared for the subject site were updated May 2008. The current ESLs were updated December 2013. The Tier 2 groundwater screening for ecological receptors, provided as Attachment E in the Technical Memorandum, also applied a different logic from the corresponding screening done in the 2012 URS report. For Tier 2 groundwater screening for ecological receptors, URS applied a dilution attenuation factor ("DAF") of 27.5 to the ESLs for the protection of estuarine aquatic habitat. This was done based on the assumption that the nearest surface water discharge point is 2,750 feet away. The DAF is equal to the distance divided by 100 feet (as used in the San Francisco International Airport site cleanup requirements adopted by the RWQCB). In the updated Technical Memorandum Tier 2 groundwater screening, the distance to the nearest discharge point is assumed to be 700 feet, corresponding to the distance from the MF25/26 area to the nearest storm water drainage ditches located north of the OMC Site.

The greater MOIA-UA site consists of three distinct leaking underground fuel leak cases and 19 areas of environmental concern (AOCs). Attachment E presented data from across the 19 AOCs for the MOIA-UA site evaluating potential chemicals of concern concentration to the DAF of 7 regardless of the actual distance of the AOC to the nearest storm water drainage ditch.

Therefore at this juncture, please address the following technical comments and submit the requested document by the date specified below:

Technical Comments

- Dilution Attenuation Factor – Please update Attachment E of the Technical Memorandum report using the appropriate DAF for each AOC.

ACEH will review the technical comment above in its determination for case closure.

Technical Report Request

Please provide a draft technical report to ACEH (Attention: Keith Nowell), for consideration prior to the next meeting, following specified schedule:

- **May 24, 2014** – Attachment E Table (file name: RO0000414_CORRES_R_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultant to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Respectfully,

Keith Nowell

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