



# PORT OF OAKLAND

September 1, 1999

Mr. Barney Chan  
Alameda County Health Care Services Agency  
Department of Environmental Health  
1131 Harbor Bay Parkway, 2nd Floor  
Alameda, California 94502

**Subject: Pacific Dry Dock Yard II, Potential Residual Ecological Risk**

Dear Mr. Chan:

It was a pleasure meeting with you on August 12, 1999, to discuss a revised work plan for the remediation of two underground storage tank sites at Pacific Dry Dock Yard II (Crowley), 321 Embarcadero Road, Oakland. At the meeting you agreed that the Port will submit a work plan that follows a more risk based approach for remediating the areas impacted by the underground storage tanks. In addition to the underground storage tank issues, Port consultant Ms. Yane Nordhav of Baseline Environmental Consulting, and I discussed with you the ecological risk evaluation conducted by Crowley's consultant Risk-Based Decisions, Inc. We indicated that Crowley's risk assessment only pertained to isolated areas of the site formerly occupied by sand blast grit, and did not address other areas of the property.

As we discussed in the meeting, the Port of Oakland is concerned that it may be held responsible for remediation of pollutants that may be encountered as a result of tenant activities. Specifically, this site is identified in the City of Oakland and Port of Oakland Estuary Policy Plan as an area slated for a Park. As such, this letter describes issues that may be of concern regarding future ecological and human health risks, based on the reviewed data:

- PCBs were identified in the northern portion of the site, in an area where supposedly bilge water had been discharged. Sixteen soil samples were collected from depths of 0.5 to 1.5 feet below ground surface (bgs). Seven of the 16 samples contained PCBs above the laboratory reporting limit of 0.10 mg/kg in the range of 0.72 to 18.00 mg/kg. The park use action level from the Regional Water Quality Control Board Order No. 98-072 for upland areas is 1.5 mg/kg and the cancer endpoint PRG for residential use is 0.2 mg/kg. Therefore, the PCBs identified in the near surface soils in the northern portion of the site would likely be a concern and require remediation prior to a park land use at the site. The extent of the affected soils have not been defined in the horizontal and vertical direction; it is therefore not possible to assess the extent at which remediation would be required (i.e., removal of soils or placement of soil cover up to two feet in thickness), but may be on the order of at least 2,000 square feet extending to depths of at least 1.5 feet bgs.

*is this a residential cleanup level?*

*industrial 1.3*

- Significant Total Recoverable Petroleum Hydrocarbons (TRPH) have been identified on near surface soils as well as at depths. It is uncertain whether this would represent a human health or ecological risk since no speciation of hydrocarbons has been performed and PAH analyses have been limited. Although action levels for petroleum hydrocarbons are relatively high and PAHs have limited mobility, solubility, and volatility, it is still the case that human and ecological risks while limited, are unknown at this time and should be accounted for.

*highest one  
B143.6'  
mw 4.5' 1700 TRPH  
1600 TRPH*

*• There are higher TRPH come in soils from beneath former USTs,*

5/8/96 Great  
MD for Cu & Pb.

- Seven groundwater monitoring wells were installed at the site. Groundwater from each well was analyzed for metals. The copper concentrations exceeded ten times the surface water quality criterion for saltwater aquatic species in all wells, and ten times the surface water quality criterion for saltwater aquatic species for lead in one well. It is unlikely that remediation of copper and lead in groundwater would be required at this site, but fate and transport modeling may be necessary to assess actual concentrations of these metals reaching the ecological receptors.
- It should be noted that Figure 11 in the GEOMATRIX Draft Work Plan for Additional Environmental Investigation, submitted to the Alameda County Health Care Services Agency (ACHCSA) in November 1997, indicates a "Plate Shop" on-site. Crowley's reports do not discuss this land use nor has Crowley analyzed soil for cyanide, often associated with plate shops. Perhaps other historical documents provide further information that would indicate that the former plate shop did not use cyanide.

Based on the issues presented above the Port of Oakland respectfully requests that the ACHCSA require Crowley Maritime to address the potential ecological risks posed by contaminants remaining on-site. Thank you for your attention in this matter. If you have any questions concerning the information provided above, please contact me at 510-272-1184.

Sincerely,



Douglas P. Herman  
Assistant Port Environmental Scientist

Cc: Neil Werner  
Joyce Washington  
Stephen Wilson, Crowley Maritime  
Karen Taberski, RWQCB  
Yane Nordhav, Baseline Environmental Consultants