

July 8, 2004

Ms. Diane Heinze
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604-2064

Dear Ms. Heinze:

Subject: Ninth Avenue Terminal, Proposed Monitoring Schedule, October 13, 2003.

Alameda County Environmental Health staff has recently reviewed the case file for the subject site and the October 13, 2003 Port of Oakland letter proposing specific monitoring changes, well closures, LOP site closure and work plans. We have the following technical comments to this letter.

TECHNICAL COMMENTS

Regional Case Approach

- The Ninth Avenue Terminal site consists of Port of Oakland properties in the areas bordered by the Embarcadero, 7th Avenue, 10th Avenue and the Oakland-Alameda estuary. Impacted parcels and areas have been identified from authoritative sampling of UST areas, aboveground tank locations, subsurface utilities and former surface release and hazardous materials storage areas. The County has approved the investigations of the suspected impacted areas, however, heretofore, investigations have been directed by the Port and their consultants. The work was done to identify source areas related to past operations and storage of hazardous materials. Initially, other sources were investigated to determine if they could have contributed to the historic release observed from the "Keep-On-Trucking" site. Most sites identified were determined not to have contributed to this historic release. However, additional RPs were identified by the Port as owners and/or operators of USTs in locations where petroleum contamination had been detected. Those sites associated with the USTs were put into the County LOP. Apparently, the Port has settled responsibility issues with these RPs, since it has accepted primary RP status for the entire site, collectively and commonly known as the Ninth Ave. Terminal. Although some of the sites have been investigated more than others, much of the investigation was performed treating the multiple sites using a regional site-wide approach. Remediation has consisted solely of free product removal from areas where it has collected, ie manholes and wells, and USTs and soil removal.

The Port requested, in their July 29, 2003 letter, that work at the entire site be suspended until the close of escrow with Oakland Harbor Partners (OHP), projected to be between September 2005 and September 2007. The assumption was that OHP would develop a Regional Approach for the remediation of this site, which is part of the Oak to Ninth project encompassing approximately 62 acres. The County, in our September 11, 2003 letter, stated they did not concur with this proposal since this would not be protective of human health and the environment, nor in compliance with environmental regulations.

The Port's responded to the County's letter in their October 13, 2003, Ninth Avenue Terminal letter, which the County addresses below.

The County has decided to combine all existing and all future release areas at this site into one site, which is consistent with the Regional Approach. This decision is based upon the following observations:

1. Site information has previously been presented individually or consolidated into a site-wide monitoring report. Several of the LOP sites within the Ninth Ave. Terminal area have been proposed for no further action by the Port. Data is scattered among seven sites, six LOP and one SLIC. Consolidation of sites and data will allow for easier data presentation, review and interpretation. No further action can be given to specific tank locations while the other areas of concern continue to be investigated, with site closure as the ultimate objective.
2. Cost apportionment has been completed between the Port and RPs and no others are expected to be identified.
3. Given the expected most conservative future residential use of the site, it makes sense to use a regional approach and consolidate all sites.
4. Additional contamination is likely to be identified given the historic industrial site use and the presence of solvent contamination. Petroleum contamination has been identified in areas remote from known UST releases indicating the potential of additional surface releases. Contamination may be discovered during the demolition of buildings during development. Under the single site scenario, no new sites would need to be established.

Work Plan Review

- Based upon the assumption that OHP would develop a regional approach, the Port suspended monitoring and proposed work plan activities. However delays in the sales has made this regional approach unpredictable. Several site-specific work plans have been submitted to the County, which the Port has recently committed to implement. The County will be providing comment on the submitted work plans addressing specific UST release areas. The County will also be requesting work plan(s) for additional site characterization ~~of UST and SLIC investigations~~ *of continuation of site*

Professional Registration Requirement

- It is noted that the Port has made specific observations and recommendations for this site in the October 13, 2003 Response Letter. The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately-registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans. Therefore, please resubmit your response letter under your registered professional stamp.

Plume Characterization

- The Port's letter states that groundwater impacts remain relatively consistent and plumes are stable, however, no specific data was provided to support this claim. In addition, most sites have not been completely characterized, therefore, it is not yet appropriate to discuss plume stability.

Human Health and Ecological Risk Assessment

- A formal human health or environmental risk assessment has not been performed for the site, therefore, it is premature to suggest that the site currently poses minimal risk to human health and the environment. The County notes that a prior soil vapor study performed at the site identified numerous locations where soil vapor samples exceeded 10% of the LEL of methane, indicative of a potential hazardous condition.

Comments to Technical Proposals

- The Port has made a number of proposals in reference to the investigation, remediation and monitoring of this site. The County has the following technical response to the proposed changes in monitoring and recommendations for UST investigation and closure.

1. Monitoring and Well Closure Recommendations

Monitoring Well ID	Port of Oakland Proposal	County Comment/Rationale
MW-2	Discontinue TEHd,mo	KOT UST area. Perimeter well around FP. Continue annual TEHd,mo w/silica gel
MW-3	Discontinue BTEX, MTBE, Continue annual TEHd,mo	Concur
MW-4	Discontinue all analysis, remove FP annually	Bailing not sufficient, propose remediation method, analyze FP for TPHg, d, mo, BTEX and MTBE.
MW-5	Discontinue	KOT UST area. Perimeter well around FP. Continue annual TEHd,mo w/silica gel
MW-6	Discontinue	Bailing not sufficient, propose remediation method, analyze FP for TPHg, d, mo, BTEX and MTBE.
MW-7	Destroy well	Continue DTW annually. County will consider Port's closure request for no further work
SCIMW-1	Discontinue	Continue DTW annually.
SCIMW-2	Annual TEHd,mo w/silica gel, discontinue metals	Concur, perimeter well, near former ASTs, historic TEHd, mo impact, up to 2001, currently 120 ppb diesel.
SCIMW-3	Continue annual TEHd,mo	Concur, down gradient of former AST farm
SCIMW-4	Water level readings only	Concur, up gradient perimeter well
SCIMW-6	Water level readings only	Concur, perimeter well, not impacted
SCIMW-7	TEHd,mo,VOCs,pesticides annually	Solvent, TPH, pesticides release. Sample qtrly for TPHg, BTEX,VOCs, TPHd, mo and pesticides. Area will require additional investigation & possible remediation, WP will be requested.
SCIMW-8	TEHd,mo w/silica gel annual	Concur, along bulkhead, TEHd, mo ND since 1998
SCIMW-9	Continue annual TEHd,mo	Concur, former AST area, up to 7000ppb TEHmo (1/2003)
SCIMW-10	Discontinue TEHd,mo	Concur, annual water elevation readings
SCIMW-11	TVH, BTEX, TEHd, mo	Concur, well down gradient of UST

	SA to A	
SCIMW-13	Discontinue annual TEHd,mo	Well within former AST area with historic release, continue annual TEHd, mo
SCIMW-15	SA to A, TEHd, mo	Concur, well along bulkhead
SCIMW-16	Water level only	Concur, TEHd low to ND
SCIMW-18	Discontinue TEHd, mo	Concur, annual DTW level, down gradient of former ASTs, near storm drain
SCIMW-19	Water level only	Concur, up gradient perimeter well, TEHd, mo ND
SCIMW-21	Discontinue	Annual DTW level, outside of Bld H-229, TEHd, mo ND since 1998
SCIMW-22	Discontinue	Solvent area well, run VOCs annually
SCIMW-23	Destroy well	Concur, well has low to ND TEHd,mo, and is at risk from potential surface releases due to no surfacing and high vehicle traffic
SCIMW-24	BTEX, TVH and TEHd,mo SA to A	Monitoring should remain as SA. Elevated concentrations present (1997-2003). Will review Port's 11/7/03 second phase investigation wp
SCIMW-26	Discontinue BTEX, MTBE, continue A TEHd, mo	Concur, but run TVH annually since it has been analyzed only once, well is up gradient & at perimeter of FP area.
SCIMW-28	Heavy metals SA to A	Concur, also run VOCs annually, well is near the solvent release area along RR track & down gradient of Lakeside Metal UST
SCIMW-29	Discontinue BTEX and MTBE	Concur, but run TEHd, mo annually, this well is near impacted well MW-6, in the KOT UST area.
SCIMW-30	Discontinue all analyses	Well was installed in VOC release area, monitor for VOCs annually
SCIMW-31D	VOCs SA to A	Concur, County will request additional invest. wp for the VOC release, including possible additional deep gw sampling
SCIMW-32	No monitoring proposed	Well is within the solvent release area, run VOCs annually, gradient appears radial
SCIMW-33	TEHd,mo, VOCs and pesticides annually	Concur, well is monitoring solvent release area
SCIMW-34	Discontinue BTEX, MTBE, TVH, PNAs and metals, TEHd, mo SA to A	Concur, also add TVH annually along with TEHd, mo, well was installed for the investigation of diesel and gasoline USTs, County to review 5/03 wp
SCIMW-35	Discontinue BTEX and TVH	Analyze for TVH, BTEX and TPHd annually, monitoring is subject to results of future investigation, County to review 5/03 wp

2. UST Removal and Closure Status

LOP Number	UST Name	Bld Location	Current Status	County Response
RO0000106	HF-03	H-107	Closure requested	County will review site for potential no further action
-----	HF-02	H-213	Port submitted wp, 5/2003	County will review wp
RO0000109	HF-12 & HF-13	H-211	11/02 wp approved, Port requests suspension, Bld above UST occupied by OPD	Concur, Port should evaluate data and propose investigation of area outside of building.
RO0000108	HF-14 & HF-15	H-209	USTs closed-in-place, closure requested	County will review closure report and NFA request
RO0000485	HF-16	H-204	8/2003 invest report submitted to County, Port submitted 11/7/03 addnl s&gw wp	County will review 8/03 report and 11/7/03 wp
-----	HF-17	H-227	8/2003 invest report submitted to County	County will review 8/03 report, provide comments & respond to request to put site invest on hold.
RO0000244	HF-19	H-314	Port submitted wp 5/03.	County will review 5/03 wp
RO0000110	HF-20&HF-21	H-317	Port submitted wp 5/03.	County will review 5/03 wp
RO0002492	Solvent release area, surface release areas, HF-02, HF-17	Entire site	SLIC case for entire 9 th Ave. Terminal site, wp and reports exist for USTs, HF-02 and HF-17	a specific wp request will be sent for the solvent area

As previously mentioned, the County will be responding to investigation work plans and reports for each individual referenced site. We will also be responding to the Port recommendations to put some investigations on hold. At this time, we request that you proceed with groundwater monitoring according to the proposed and County Response schedule.

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos
B. Graham, RWQCB

NinthAve7_8_04