



# PORT OF OAKLAND

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September 29, 1993

Mr. Ed Howell, Chief of Hazardous Materials  
Alameda County Health Agency  
Division of Hazardous Materials  
Department of Environmental Health  
80 Swan Way, Room 200  
Oakland, California 94621

**Subject: Annual Environmental Compliance Report**

Dear Mr. Howell:

Enclosed for your information is a copy of an annual environmental compliance report of Port programs. The report highlights what we have done during the last fiscal year and what we hope to achieve during the current year.

If you, or any of your staff, have any questions regarding this report, please feel free to call me at 272-1176.

Very truly yours,

*Neil Werner*

Neil Werner  
Port Environmental  
Compliance Supervisor

enclosure

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# PORT OF OAKLAND

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**ENVIRONMENTAL COMPLIANCE**  
**HAZARDOUS MATERIALS MANAGEMENT**  
**FISCAL YEAR 1992-1993**  
**PROGRAM REPORT**



**Prepared by:**  
**Port of Oakland**  
**Environmental Department**

## INTRODUCTION

The main purpose of this report is to present an overview and status report on the various hazardous materials management programs of the Port of Oakland as of the end of the Port's fiscal year, June 30, 1993. (PART I). This report will also address future activities for new and ongoing programs (PART II).

The Environmental Department is one of eight departments of the Engineering Division of the Port and it includes the Environmental Assessment Section and the Environmental Compliance Section. The Environmental Assessment Section evaluates the environmental impacts of proposed Port activities. The Environmental Compliance Section obtains permits from agencies that regulate the Port's activities, ensures compliance with those permits, and oversees the management of hazardous materials for the Port. This report focuses on the management of hazardous materials because those materials are of concern to agencies regulating public health and water quality, and because the management of hazardous substances is a critical fiscal issue for the Port.

There are three different sources of funds for environmental compliance activities--operating budget, capital budget and liability accounts. The costs of contracted environmental services that result from ongoing operations are set aside in an annual operating budget. For the year ending June 30, 1993, the contractual services element of the operating budget was \$357,300. Actual expenses, \$257,592, were less due to the fact that most work was charged to the capital or liability accounts.

The Port also expects to discover and remediate environmental problems when it builds new projects; those costs are part of the capital budget for new construction projects. Capital expense for contracted environmental compliance activities conducted during the fiscal year ending June 30, 1993 totalled \$1,391,053.70.

Further, the Port has booked as liabilities those expenses for environmental programs and clean-ups that it determines probably will be required in the foreseeable future; the Port took this action in accordance with standard financial accounting rules. The Port first booked environmental liabilities in 1991 and, since that time, it has spent significant sums to reduce environmental liabilities. During the fiscal year ending June 30, 1993, the Port reduced booked environmental liabilities by \$1,412,830.16. In addition, staff identified and added \$3,168,253 in new environmental liabilities when it became apparent that the expense was probable. The new environmental liabilities consisted of: \$1.2 million for Superfund remediation; \$1,118,253 for the tank compliance program (consulting, additional tank removals, tank retrofitting, bioremediation and labor); \$100,000 for investigation and cleanup at a North Field training site; and \$750,000 for investigating and cleaning up a large diesel spill. On 6/30/93 the total environmental liability in all accounts was \$5,419,100.

**PART I: FY 92-93 HAZARDOUS MATERIALS PROGRAMS AND PROJECTS**

**A. Underground Storage Tank Program**

Underground storage tanks are a major source of subsurface contamination and expose the Port to potential economic liabilities. Between 1987 and 1990, 21 tanks throughout the Port Area were removed from the ground as part of redevelopment projects. In 1990, the Environmental Compliance Section Developed a tank management strategy to address compliance for the remaining tanks in the Port Area (137 in total including 66 tenant owned tanks) and put into place a comprehensive program to achieve compliance with local, state and federal underground storage tank laws and regulations.

The program was first identified as a liability on the financial statement for the year ending June 30, 1991, when the Port recognized the importance of the program and established a liability account to assure funding for compliance. Compliance generally consists of obtaining permits to operate or close a tank. Since most tanks are not up to current code, it has been the Port's policy to remove all tanks not essential for continued Port operations. Six Port-owned tanks were removed during FY90-91. During Fy 91-92, the Port completed tank removal projects for 15 additional tanks. During the year ending June 30, 1993 the Port continued to remove tanks albeit at a slower pace. Five tanks were removed (four at the Amtrak Station construction site and one at Keep on Trucking). Plans scheduled for future nearterm activity include five removals (tanks CF17-20, and PF01) and six replacements (BF07-09, CF01, CF02 and CF04) in the early part of FY93-94. During FY 92-93 \$544,154.61 was deleted from the tank liability account. The following table summarizes the current status of the program:

<b>Tank Activity Description</b>	<b>Number</b>
Historic Number of All Tanks in Port Area (1986)	158
Historic Number of Tenant Owned Tanks (1986)	66
Historic Number of Port Owned Tanks (1986)	92
Port Tanks Removed with Development 1987-1990	21
Port Tanks Removed During FY 90-91	6
Port Tanks Removed During FY 91-92	15
Port Tanks Removed During FY 92-93	5
Number of Port Tanks in Ground on 6/30/93	45
Number of Port Tanks Scheduled for Future Removal or Replacement (Within next 3 years)	23

The 22 remaining tanks are in compliance and have been issued permits to operate.

## **B. Soil Remediation**

Removal of an underground storage tank does not end the compliance story if the tank has leaked. Contaminated soils must be removed or remediated. An important element of the underground storage tank program is the establishment of a central facility to biologically treat contaminated soils from tank excavations and other sites. The process of biologically treating contamination is known as bioremediation. The Port established an area on Port property near the intersection of Langley and Doolittle Drive at the North Airport for this purpose. During the past fiscal year the facility was enlarged and treatment of 3500 cubic yards of soil was initiated.

## **C. Groundwater Monitoring**

Even after tanks have been removed and soil remediated, it may be necessary to monitor groundwater to make sure that fuels have not contaminated ground or found their way to surface waters. The Port has installed over 200 wells and is continually monitoring groundwater quality. This monitoring activity continued during the fiscal year. Five new wells were installed during the fiscal year and many others will be installed in the future.

## **D. Storm water Discharge Program**

In 1987 amendments to the Clean Water Act (CWA) established a framework for regulating industrial and municipal storm water discharges under the National Pollutant Discharge Elimination System (NPDES). On November 16, 1990, the Environmental Protection Agency (EPA) published final regulations that established requirements for storm water discharge permits for specific categories of industrial facilities, including shipping, trucking and air transport facilities. These regulations, and the State of California's matching requirements, are implemented by the San Francisco Bay Regional Water Quality Control Board (RWQCB).

In order to help tenants and others comply with the regulations, the Port of Oakland organized a Working Group (Group) to prepare a Storm Water Monitoring Program (SWMP). The proposed Group SWMP was submitted to the RWQCB on December 28, 1992. As the permit process evolved, the Port also aided in the preparation of a required Storm Water Pollution Prevention Plan (SWPPP). The Port/Tenant SWPPP was submitted to the RWQCB on June 29, 1993 along with the following three documents: 1) final Group SWMP, 2) the Port of Oakland Group Storm Water Monitoring Report 1992/1993, and 3) an Amended General Industrial Activities Storm Water Permit.

## **E. Asbestos Management Program**

The Environmental Department provides a number of services related to asbestos management at the Port. Federal regulations require that buildings be surveyed for asbestos prior to demolition or major renovation. The surveys are coordinated by the Department. The Department also reviews construction plans and specifications

for all projects which call for disturbance or removal of asbestos, and works with consultants to provide air sampling and project management on asbestos projects. Finally, the Department prepares notifications to Port employees regarding the presence of asbestos in Port-owned buildings. During FY92-93, the Department managed asbestos surveys of approximately eight buildings; provided input on specifications for asbestos removal at three buildings (including a major asbestos removal project to accommodate the Oakland Tribune staff in the former Port Building at 66 Jack London Square); and prepared required asbestos notifications.

#### **F. Spill Management Program**

State and Federal law require that a Spill Prevention, Control and Countermeasure (SPCC) Plan be prepared for all aboveground fuel storage facilities that, due to their location, could potentially discharge harmful quantities of oil into navigable waters. In FY91-92 a SPCC Plan for the fuel farm at the Airport was submitted. The Port does not operate other aboveground fueling facilities that require a SPCC. In FY92-93 the Port requested a time extension to submit an Oil Spill Response Plan as required by the Oil Pollution Act (OPA) of 1990. The Response Plan will upgrade the SPCC to incorporate the specific requirements of the OPA.

During the fiscal year ending 6/30/93, the Port environmental staff discovered a major underground leak from a tenant's diesel tank supply line. The leak apparently had gone undetected for a considerable time. The leak became evident in October, 1992, when the first storm water of the winter season flushed the diesel (from the storm water pipes where it had accumulated) into the Oakland Estuary. More than 20,000 gallons of product were recovered from the Estuary. The Port took responsibility for reporting and cleaning up the spill even though the US Coast Guard determined the tenant was the primary responsible party. The Environmental Department recommended that the Port establish an environmental liability account in the amount of \$750,000 to address the cost of investigating and cleaning up this spill. The Port followed this recommendation and successfully concluded cleanup during the fiscal year. The Port is seeking reimbursement from the tenant.

#### **G. Superfund Project**

At the corner of Embarcadero and Dennison Street is a vacant lot that once was a packaging plant for wood preservatives and other hazardous chemicals. The site is contaminated with residues from the former plant and has been listed by the State of California as a hazardous waste site. The lead agency regulating the remedial investigation and cleanup is the Cal EPA, Department of Toxic Substances Control (DTSC). The Regional Water Quality Control Board (RWQCB) is also actively regulating the site since groundwater contamination is present. The Port has created a liability account for work related to investigating and cleaning up this site. The account considers that the Port is sharing costs equally with a former tenant. It is estimated that approximately \$65,000 has been expended by the Port for its share during the fiscal year on this project.

The Port submitted a Draft Feasibility Study in March, 1993, and a Preliminary Draft Remedial Action Plan in April, 1993. The recommended remedial alternative is to place a multi-media cap over the site, install a HDPE curtain wall around the site and monitor groundwater to determine if contaminants are moving off site. The Regional Water Quality Control Board may impose further requirements.

#### **H. Berth 30 Soil Contamination**

During the 1992-1993 fiscal year the Port began construction of the first new marine terminal project in the last ten years. As part of the project specifications the Contractor was required to excavate the shoreline and dispose of the soils off site. In order to dispose (the contractor intended to sell) the soil had to be analyzed for the presence of any hazardous wastes. Soluble lead in hazardous concentrations was discovered and the Environmental Department was suddenly engaged in a major new effort to delineate and manage the contaminated soils. Extraordinary efforts were necessary to keep the construction project on schedule. The Port characterized the soils and instructed the Contractor to segregate and stockpile the soils. Special equipment had to be installed on site to remove large rocks from the soil mass so that proper characterization of the soil could be performed. Thousands of samples were collected and analyzed. Eventually a Report of Waste Discharge was obtained from the RWQCB and DTSC reclassified the hazardous soils so that they could be accepted in a landfill.

It is estimated that the total amount expended for the environmental investigation of the Berth 30 soils, including a smaller problem with hydrocarbons apparently associated with a former tank farm, is \$809,489. The estimate includes consulting costs, laboratory costs, and permit fees. It does not include Port labor costs, or construction change orders as a result of the soil contamination.

#### **I. Training**

During the fiscal year the staff of the Environmental Compliance Section received training in hazardous waste operations and emergency response as required by 29 CFR 1910.120. In addition staff received training from seminars and "brown-bag" noontime presentations.

#### **J. Miscellaneous Compliance**

The Port undertakes property audits and compliance audits during the year. Property audits are used in analyzing new development projects, or renewals of leases, and are primarily intended to provide financial and scheduling information about the feasibility of new development projects. Compliance audits are undertaken when the Port believes that activities may be creating environmental problems. Both kinds of audits plus previous investigations and regulatory agency directions result in clean-up projects. The

following audits and clean-up projects are organized by Revenue Division of the Port.

### Airport Environmental Compliance

- EBMUD Compliance: The Port has a permit from the EBMUD to discharge sanitary waste into the sewer at the Oakland Airport. The permit requires the Port to monitor the discharge for various contaminants to confirm that these are below permitted thresholds. During the fiscal year 1992-1993, no violations of the limits were detected.

In addition to monitoring the discharge effluent, the Port is required to conduct a facilities audit of all airport tenants that use and store hazardous materials. The annual audit was conducted in May, 1993. The purpose of the inspections is to 1) identify tenants whose hazardous materials/waste handling, storage, and disposal practices could cause unauthorized releases to the sanitary sewer, 2) to identify the general classes of hazardous materials used by each tenant so that any future unauthorized release will be easier to trace back to an individual tenant, 3) to educate tenants about new regulations, such as the NPDES stormwater program, and 4) to distribute information on waste reduction techniques.

All facilities audited are aware of the benefits of waste minimization and recycling, mostly due to the cost savings advantages. All the facilities contract with a waste oil and/or solvent recycler to dispose of these wastes on a regular or as-needed basis. Although the larger facilities have a sophisticated knowledge of environmental compliance, the smaller facilities still were not aware of the specific threshold levels for preparing a Hazardous Materials Business Plan or time limits for accumulation of wastes. Several of the facilities lacked secondary containment for hazardous waste as well as properly labeled drums. In addition, many of the facilities do not have adequate spill prevention and clean-up procedures and due to their size requested that the Port organize some kind of a spill clean-up consortium.

-PCB Clean-up: During the fiscal year the Port and EPA finalized an agreement to address a number of violations of the Toxic Substances Cleanup Act (TSCA) pertaining to PCB's at the Oakland Airport. Contract documents were prepared to dispose of the contaminated concrete floor of a storage facility for transformers containing PCB's. The concrete will be removed in the Fall of 1993. Record keeping of PCB information was improved.

-OSHA Audit: The Oakland Airport was inspected by OSHA during the fiscal year 1992-1993. The inspection resulted in a number of citations regarding hazardous materials/wastes. The Environmental Compliance Section staff assisted management with asbestos removals, hazardous materials labeling and storage modifications and training.

-Lease Vacation Audits: At the request of Airport Properties, Environmental Department staff conducted site walks of facilities



whose tenants had either vacated their lease or notified the Port of their intention to vacate the lease premises. Staff inspected properties for hazardous materials abandoned by the tenants and commenced phase II sampling in a number of instances.

#### Commercial Real Estate Compliance

- Crowley Maritime: Crowley Maritime is planning to vacate leased properties at 321 Embarcadero and 1441 Embarcadero. Both sites have significant contamination problems. Environmental Department Staff reviewed environmental studies conducted by Crowley at both sites and provided input to Legal and Commercial Real Estate. Environmental Department Staff also participated in negotiations on an Environmental Agreement between Crowley and the Port.

-Seabreeze Marina: The Port submitted a workplan for further investigation at the Seabreeze site to the County in March, 1992. As of the end of FY92-93, the Port was still awaiting a response from the County.

-Oakport Land Transfer: Environmental Department staff worked with City of Oakland staff and EPA to conduct a sampling program at the Oakport site. A report of the results of the sampling effort was provided to EPA and the City in April. Based on the results, the City went ahead with the purchase of the property.

-County Household Hazardous Waste Facility Site: Environmental Department staff provided input during negotiations between Alameda County and the Port regarding the proposed sale to the County of a parcel at Kennedy and Embarcadero.

- Cryer Boatworks: Environmental staff prepared an audit of a former boatworks facility that is partly privately owned and partly Port owned. The facility was a commercial boatyard for about one hundred years. Field sampling has been recommended.

#### Marine terminal Environmental Compliance

- Former Mobil Oil Bulk Terminal Remediation: This project is proceeding in accordance with the schedule that was agreed upon during the Port's March, 1993 meeting with Mobil, Alameda County Department of Health, Regional Water Quality Control Board, and Alameda County District Attorney. Mobil's consultant (Alisto Engineering) has installed a number of properly constructed wells in order to determine the extent of the product and dissolved phase contaminant plumes.

Subsurface hydrocarbon contamination is widespread at the Maersk Terminal (Berth 24), with some contamination at TBCT (Berth 25) and SSA (Berth 23) Terminals. The severity of the contamination is not nearly as bad as previously reported. It also appears that the contamination is now contained and that the free product consists of thin sheens of fuel (unmeasurable thickness) in very few spots, rather than large pockets of product with thicknesses greater than one foot, as previously reported. A total of 10 gallons of product

has been recovered from all the wells on the site during the last year of monitoring.

- Maintenance Dredging: Marine Terminals Division requested that the Environmental Department obtain permits to conduct maintenance dredging in 16 areas that the Port is authorized to maintain. These areas include Berths 7, 8, 9, 22, 25, 26, 30, 32, 33, 34, 35, 36, 37, and the Berth 26 Connecting Channel, the Berth 26/30 Triangle, and the Outer Harbor Channel (OHC). Permits have been obtained, or are expected in the immediate future for all areas except half of Berth 9, Berth 24, Berth 30, and two small mounds along the banks of the OHC.

## **PART II: FY 93-94 HAZARDOUS MATERIALS PROGRAMS AND PROJECTS**

Programs that are underway are expected to be continued during FY 1993-1994. The financial means to continue these activities has been obtained through adoption of the operating budget and identification of environmental liabilities. Contingencies to fund projects not yet identified, but which must be addressed at the time they are identified, are in place. The Environmental Department is renewing its contractual arrangements with consultants and laboratories to provide services on an "as-needed" basis.

### **A. Underground Storage Tank Program**

For the underground tank program, scheduled removal and replacements are in the pipeline. During FY 93-94, it is expected that eleven removals will occur (BF07-BF09, CF01, CF02, CF04, CF17-CF20, and PF01). Five of these tanks (BF07, BF08, CF01, CF02, CF04) will be replaced with either aboveground or belowground tanks. Underground waste oil tank BF09 will be removed and replaced with a an aboveground tank. Pacific Dry Dock will remove tank GF01. Retrofitting and permitting will continue. At least eight tank removals will be deferred beyond the FY93-94 fiscal year.

### **B. Groundwater Monitoring**

Groundwater monitoring wells will continue to be installed, primarily at tank sites and monitoring will be conducted quarterly unless the data suggests that less frequent monitoring is justified.

### **C. NSC Oakland**

The Environmental Department will provide technical assistance to characterize and remediate lands at the Naval Supply Center that will be redeveloped for commercial maritime uses.

### **D. Union Pacific RR Roundhouse Land**

The Environmental Department will assist the Commercial Real Estate Division in characterizing the environmental condition of a

proposed 40 acre parcel acquisition.

#### **E. Oakport Parcel--Lead Cleanup**

The Environmental Department will oversee removal of lead-containing soils from the 22 acre parcel at Oakport so that the City can proceed with development plans. The remediation is estimated to be about 165 cubic yards of soil. The project will proceed when EPA approval is secured.

#### **F. Middle Harbor Road to Seventh Street Connector**

To serve as a bypass road while portions of Seventh Street are closed during construction of an alternate to the Cypress Section of the 880 freeway, an improved four lane road will be constructed on top of the existing two land private SP roadway. During construction the environmental Department will be working closely with Construction and SP and will assist with proper handling of any contamination encountered.

#### **G. Superfund Project**

The Embarcadero Cove Project is expected to move into the remedial phase during the fiscal year 93-94. Approval of the Remedial Action Plan by DTSC has been obtained and the Port and Monsanto Company will be negotiating to obtain approval from the RWQCB as well.

#### **H. Lot 12, Jack London Square**

Lot 12 at Jack London Square is known to be contaminated with coal gassification residues. A Preliminary Environmental Assessment (PEA) is under preparation and is being jointly funded by the Port and Pacific Gas and Electric Company. The PEA will be used to determine what measures will be necessary to remediate the site so that development can occur.

#### **I. Seabreeze Marina**

County approval of the workplan to remediate the site is expected during the fiscal year 93-94. Once approval is obtained, the Environmental Department will implement the plan. Coordination with the Port Attorney Office and insurance companies will be necessary.

#### **J. Fire Training Pit**

The Environmental Department is expecting to commence investigation of the fire training area on the Oakland Airport during the fiscal year 93-94.

#### **K. Former Mobil Bulk Loading Terminal**

Mobil and the Port have agreed to pursue an Environmental Risk Analysis to show that the product is degrading and that no further work is warranted. In addition, Mobil will propose to destroy the

existing well recovery system which has not been effective for a number of years. Mobil has agreed, in principle, to enter into an agreement with the Port to take liability for contamination encountered on-site (within the delineated contaminant plume) through perpetuity.

#### **L. Maintenance Dredging**

Berths 7, 8, 24 (except for one mound that will be removed this year), 25, 35, and 36 have already been dredged. Dredging of the remaining berths are scheduled to begin on 4 October 1993. Some dredging will continue into the December herring closure period, if environmentally feasible. As long as dredging will not adversely impact the herring, the Environmental staff will request and obtain a waiver to continue dredging as long as possible.