

## Nowell, Keith, Env. Health

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**To:** Diane Heinze  
**Cc:** APB1@pge.com; Bailey.Blosser@erm.com; Roe, Dilan, Env. Health  
**Subject:** Fuel Leak Case RO2962, 205 Brush St, Oakland, Port of Oakland / Downtown Oakland CNG Station

Dear Ms. Heinze,

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site in conjunction with the *Port of Oakland Phase II Environmental Site Investigation Work Plan for 205-209 Brush Street* (work plan) in Oakland dated January 16, 2014. The work plan was submitted to ACEH by ERM as a courtesy to ACEH to inform ACEH of a due diligence Phase II investigation on behalf of PG&E. ACEH considers the area addressed in the work plan as part of the open ACEH case file RO0002962 as the areas of investigation are abutting and are situated on Assessor's Parcel Number (APN) 1-111-5-1 which is the parcel of record for the subject site.

ACEH's review of the work plan was not comprehensive as ACEH has not been provided a copy of the Phase I Environmental Site Assessment conducted for the site as referenced in the work plan. ACEH also has not received environmental reports associated with the removal of the underground storage tanks located on the parcel, or other contamination referenced in the work plan, such as the reference to contamination at the location of boring SB-3.

Based on our review of documents available to ACEH at this time, ACEH conditionally approves the work plan providing the following technical comments are addressed:

### Technical Comments

- Advance all borings to at least first water for recovery of grab groundwater samples;
- Add the fuel oxygenates methyl tertiary butyl ether (MTBE), diisopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA), and the lead scavengers 1,2-dibromroethane (EBD) and 1,2-dichloroethane (1,2-DCA) to the scope of analyses for both soil and groundwater samples;
- Advance boring SB-1 to a depth sufficient to pass through the tank backfill material for a recovery of a native soil sample at this location. Please note that this may not vertically define the contamination in this area.
- ACEH recommends that soil samples should be collected and analyzed at intervals of no more than five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the vertical delineation of contamination within this interval.
- Collection and analysis of the tank backfill material at boring location SB-1;
- Analysis of soil gas should include naphthalene by method TO-17.

A more complete review of the work plan would include a review of the Phase I Environmental Assessment conducted for the site. Please upload all reports documenting environmental conditions at the referenced fuel leak case, including the results of this current investigation.

### Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **February 21, 2014– Phase I Environmental Assessment** (file name: RO0002962\_PHASE1\_R\_yyyy-mm-dd)

- **March 28, 2014– Soil, Groundwater, and Soil Gas Investigation** (file name: RO0002962\_SWI\_R\_YYYY-MM-DD)

Thank you for your cooperation. 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](mailto:keith.nowell@acgov.org).

Respectfully,

Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>