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R. William Rudolph, P.E. President

March 26, 1997 SCI 133.005

Mr. Jonathan Redding, Esq. Fitzgerald, Abbott & Beardsley, LLP 1221 Broadway, 21st Floor Oakland, California 94612

Site Investigation Update Ninth Avenue Terminal Area Oakland, California

Dear Mr. Redding:

Subsurface Consultants, Inc. (SCI) has prepared this letter to present significant findings from the current phase of ongoing investigation of the Ninth Avenue Terminal. The current scope of investigation, as approved and required by Alameda County Health Care Services Agency (ACHCSA) in its letter dated January 14, 1997, involved continuing the identification of sources and preliminary evaluation of the extent of impacts. The research, field studies, and analytical testing tasks of the current investigation have been completed and the results are being summarized in a data report for submission to Alameda County in April or May 1997. In the interim, draft analytical tables and a site plan presenting the new data are enclosed for your review.

The results of this phase of the study have revealed new sources and migration pathways. Additional investigation and evaluation of these sources, migration pathways, and extent of contamination is necessary to support the litigation and mediation goals of the Port of Oakland and to comply with ACHCSA¹ requirements. The new findings and the proposed scope of supplemental investigation are presented below.

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Cyanide and hexavalent chromium have been detected in groundwater near previous plating sumps, and hexavalent chromium was detected in soil in the rail loading area of the former Midland-Ross plating facility in Building H-232. The facility was decommissioned in about 1987. It is SCI's understanding that Midland-Ross's wastewater treatment system was operated under a RCRA permit. However, it appears that Midland-Ross received no regulatory agency approval of the facility closure. To confirm and preliminarily evaluate the extent of impacts, monitoring wells should be installed and sampled in the area of the previous improvements, and existing wells in the immediate vicinity should also be sampled. Samples should be analyzed for the contaminants of concern in this area (e.g., cyanide and chromium). In addition, shallow soils in the rail loading area should be evaluated for the presence of cyanide and chromium.

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DDT was detected in groundwater along a rail spur line extending near the former Britz Chemical company property (near former Building H-207), and DDE and DDD were detected in grab groundwater samples in the depressed trackage area near the center of the terminal (near former Building H-215). Groundwater monitoring wells should be installed in these areas to confirm actual concentrations of DDT/DDE/DDD products. In addition, test pits should be excavated to further evaluate the extent of DDT/DDE/DDD products in soils within these areas.

ACHCSA letters containing orders dated August 2, 1996, December 2, 1996 and January 14, 1997.

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Free floating diesel has been observed in the area of the current aboveground storage tank operated by Keep on Trucking (KOT). Test pits should be excavated to further evaluate the source of the diesel and the lateral extent of the separate-phase product.

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The area impacted by solvents appears to correspond to material handling, storage and/or processing areas within the former depressed trackage behind the former Building H-215. Samples should be obtained and analyzed for solvents from this area during the next phase of study to further evaluate source(s) and the lateral extent of impacts.

ACHCSA inspection reports indicated that chemicals were stored at the Lakeside Metals Recycling facility and that an underground storage tank (UST) was used at the site. SCI's preliminary reconnaissance of this facility revealed the location of chemical storage and usage areas, and recently the location of the former UST. Based on our discussions with persons knowledgeable about the property, it appears that the UST was removed without the required permits. Additional investigations are warranted in the former UST area to comply with ACHCSA closure requirements. Initially, a test pit should be excavated in the area of the former UST to evaluate current subsurface conditions.

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The Lakeside Metals area has had a long history of metal recycling uses. Elevated levels of oil and grease, lead, and PCBs have been detected in shallow soils. Elevated lead has also been detected in groundwater. A preliminary evaluation of the extent of shallow soil impacts should be conducted during the next phase of the data gap investigation. Additionally, a well should be installed to evaluate impacts to groundwater as a result of the shallow soil impacts.

Railroad ballast within the buried portion of the depressed trackage has been observed to be saturated with petroleum products. Review of aerial photographs confirms extensive spillage to the ground surface within areas of the trackage associated with the former rail loading/unloading facility installed by American Bitumuls. It is our understanding that American Bitumuls is the predecessor-in-interest to Chevron in this area of the site. Underground piping apparently associated with this fuel loading facility was also revealed in several test pits. Free floating petroleum products were observed in these pits. The ballast and pipe bedding materials are likely to act as preferential pathways for migration of chemicals. Additional test pits should be installed along side and within the trackage area to further evaluate the lateral extent of impacts.

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Research to date indicates that Building H-229 had been used by Marine Terminals Corporation (MTC) for fertilizer bagging, and by KOT, Western Tube & Conduit, and C.D. Ericson for storage and vehicle maintenance. Staining was observed around this building in numerous aerial photographs. The building is currently used by KOT. Various-sized containers of chemicals and wastes were observed in the building during site reconnaissances in 1996. Additional investigation should be performed in and around this building to identify potential contaminants of concern. A monitoring well should be installed near a storm drain catch basin north of the building.

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- Limited records research indicates that there was a fueling facility operated by MTC near Building H-317. Available information indicates that a past release of gasoline from this facility impacted the Oakland Estuary. Documents regarding tank removal have not been reviewed. A test pit should be excavated in the area of the gas pump/tank system to evaluate soil and groundwater conditions.
- Piping was found beneath the existing KOT office trailer which was constructed over the area of the boiler fuel
 oil USTs formerly used by Safeway. This finding also suggests that the USTs may still be in place. SCI noted
 petroleum vapors in the pothole excavated to locate the piping. No additional study is planned in this area at
 this time due to the presence of the building. It may be possible to temporarily move this building to allow for

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investigation of subsurface conditions in this area. However, this will be subject to further discussion between the Port, KOT, and Safeway (the last known operators of the boiler system).

- Review of historical aerial photographs indicates that significant surface staining was present in areas of the site currently being used by several Port tenants. Soil and groundwater conditions should be checked in areas of staining which have not been investigated to date, including the following:
 - Between the American Bitumuls (Chevron) lease area and the wharf, where there may have been aboveground piping from the tanks to the wharf.
 - South of the rollup door for former Building H-215 where staining was observed on photographs taken when AMCO and Groeniger were Port tenants.

Near the northeast rollup door at former Building H-213 adjacent to the loading dock area where staining was observed on photographs taken when Western Tube & Conduit occupied the building.

- Along the Clinton Basin shoreline in the area of the former bulk fuel processing facilities formerly operated by Bay City Fuel Oil Company and East Bay Oil Company.
- Although not fully defined, it is apparent from the studies performed by SCI and others that preferential migration of chemicals within utility pipelines and/or bedding materials is a primary mode of contaminant transport at the site. As such, there should be ongoing investigations to further evaluate utility corridors. Non-destructive investigation of the Cannery Line has been hampered by the presence of liquids within access manholes. Therefore, investigation should include excavating test pits to expose portions of the main storm drain and sanitary sewer lines along 8th Avenue, as well as the Old Cannery Line. Once exposed, the construction of the lines should be checked to evaluate the potential for preferential flow to occur.

The attached site plan shows the planned locations of borings, test pits, and monitoring wells for the next phase of investigation activities.

The investigation outlined herein is in accordance with ACHCSA orders to complete the investigation of sources and impacts of contamination prior to preparing a corrective action plan. SCI has the resources available to conduct the presented study once written approval is obtained from the ACHCSA. Please call at your earliest convenience to discuss our findings to date and the scope of the additional required studies.

Yours very truly,

Subsurface Consultants, Inc.

Jeriann N. Alexander, PE, RE

Project Manager

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Attachment: Site Plan Showing Proposed Investigation Plan

Draft Analytical Tables and Site Plan

5 copies submitted

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