



November 1, 2010

Ms. Wing Yan Suen, Sr. REHS  
Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502

RE: North Port of Oakland Refuse Disposal (NPORD) Site

Dear Ms. Suen,

In response to the concerns in your letter dated October 6, 2010 which are re-stated below, the Port of Oakland ("Port") has the following responses:

1. *Per CCR Title 27, §20921, an area of concern:*

*Gas monitoring results of methane is above 5% by volume at the vapor well (VW) VW-1 since 2006 (The reading at VW-1 during the second quarter of 2010 gas monitoring report was about 45%.)*

*Conduct sampling to determine the origin of the methane by a reputable company (3<sup>rd</sup> party consultant). Provide action plans to remediate CH4 below 5% by volume at VW-1. (During the July 29, 2010 joint inspection, D. Boldberg (actually Goldberg) mentioned that there was a fuel storage tank spill in 90's, near the VW-1 area)*

Since 2008, MSE Environmental ("MSE") has been conducting the routine vapor monitoring at the North Port of Oakland Refuse Disposal (NPORD) site ("the Site") on behalf of the Port. After our joint meeting on July 29, 2010, I instructed MSE to collect vapor samples in monitoring well MW-7 and vapor wells VW-1 and later VM-9 in order to determine whether the source of the methane in well VW-1 could be associated with the jet fuel storage tank release(s). The results of these analyses will be documented in the next MSE quarterly methane report.

2. *Per CCR Title 27 §20919, an area of concern:*

*The gas monitoring program shall not be discontinued until authorized to do so in writing by the requiring agency (i.e., LEA and Department of Resources Recycling and Recovery, CalRecycle). Provide a justification of decommissioning of vapor well VW-6, VW-7, VW-8, VW-10, VW-11, and VW-12 since September 2008.*

In a letter dated October 21, 2008, the Port notified Ms. Eva Chu that a number of methane monitoring wells had been inadvertently destroyed, and requested that going forward, only vapor wells VW-1 and VW-9 be monitored for %LEL/methane concentrations. In that letter, the Port provided justification for not reinstalling these wells, because with the exception of VW-11 (reported as 0.2% lower explosive limit-LEL on January 31, 2008), no detectable levels of %LEL/methane had been documented in these inadvertently destroyed vapor wells since November 29, 2007. The Port also advised Ms. Chu that the former landfill has been closed for over 50 years, as that no debris has been placed at the former landfill site since approximately 1959-60.

In addition, the Port provided justification for not reinstalling these vapor wells in MSE's cover letter addressed to Ms. Chu dated February 3, 2009, and the Port's cover letter dated February 9, 2009. I have attached these documents for your review.

***Those destroyed VWs mentioned above need to be re-installed soon.***

*(No writing documents in our records support that LEA has approved decommission of VW mentioned above. They were inadvertently destroyed by SCA which decommissioned the groundwater monitoring wells in the records.)*

The Port respectfully requests that based on the results of the historical %LEL/methane monitoring, that reinstallation of the inadvertently destroyed wells not be required by Alameda County. Reinstallation and continued monitoring of these vapor wells will not result in any added benefit or reduction of risk to either human health or the environment. As such, the Port believes that no hazard or nuisance is being or will be created by landfill gas in the areas where the vapor wells were inadvertently destroyed.

The Port has performed numerous investigations at the Site, of particular interest is the Site Investigation report prepared by ETIC Engineering, Inc., dated June 7, 2005. As part of this investigation, thirty-six (36) soil gas borings were installed on a grid basis at the Site. The highest % methane concentration reported during the 2005 study was 12% by volume in boring SG-6, located near the restrooms at the Soccer Field (see Figure 5 of the June 2005 ETIC report-included). No other concentrations exceeding 5.8% methane by volume (SG-31) were reported during this investigation. This in itself suggests that the high concentrations of methane gas (about 45%) detected in vapor well VW-1 is not associated with the former NPORD landfill.

The Port believes that the high %LEL/methane concentrations consistently reported in vapor well VW-1 are not the result of landfill gas, but the anaerobic degradation of fuel hydrocarbons in the vicinity of monitoring well MW-7 and vapor well VM-1. If the analytical results for the vapor samples recently collected from groundwater monitoring well MW-7 and vapor wells VW-1 and VW-9 document that the reported concentrations of %LEL/methane are not associated with landfill gas, Sections §20919 & §20921 would not seem to apply.

Alameda County's Local Oversight Program (LOP) is the lead agency for oversight of the adjacent Rolls-Royce Test Cell facility, where vapor well VW-1 is located. Therefore, it is the

Port's intent to have any fuel hydrocarbon releases regulated by Alameda County's LOP, and not the Office of Solid and Medical Waste Management.

Please feel free to contact me directly at 510-627-1118 with any questions concerning this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale Klettke". The signature is fluid and cursive, with the first name "Dale" written in a larger, more prominent script than the last name "Klettke".

Dale Klettke, CHMM  
Associate Environmental Scientist  
Port of Oakland  
530 Water Street  
Oakland, CA 94607  
510-627-1118

C: David Goldberg, Rolls-Royce Engine Services, Oakland  
Michele Heffes, Acting Assistant Port Attorney  
Ariu Levi, Director, Alameda County Health Care Services Agency  
Sabra Ambrose, CalRecycle  
Paresh C. Khatri, Alameda County, LOP Program  
Chris Noma, Wendel, Rosen, Black, and Dean, LLP