

May 6, 1994

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Ms. Jennifer Eberle Hazardous Materials Division Department of Environmental Health Alameda County Health Services Agency 80 Swan Way, Room 200 Oakland, CA 94621

SUBJECT: Meeting Regarding Port of Oakland Projects

Dear Ms. Eberle:

As we discussed on May 5, 1994, I believe it would be beneficial for the Port to meet with representatives of the ACDEH to discuss and update issues related to a number of Port sites. I understand that you and Barney Chan will be dividing oversite duties on Port projects. I believe it would be beneficial to have Barney present along with Paul Smith, the previous County representative to add continuity to the discussion.

The Port site that is most pressing for me to discuss with you is the Port Bioremediation Site at the Oakland North Airport (Langley and Dolittle Streets). Our contract with Bay Area Tank and Marine (BATM) is currently on hold until we can resolve with you the issue of Oil and Grease being used as the determining factor of when the soil is clean. BATM's treatment method requires the use of linseed oil which will increase the concentration of oil and grease. Both the Port and BATM believe that specific analysis for the constituents of concern including gasoline, diesel, BTEX, and motor oil analysis are more appropriate for determining when the soil is clean.

Other sites that we should discuss include the former Mobil, and Ashland Oil sites (909 Ferry Street), Keep on Trucking (370 8th Avenue), CAN Transport (196 Burma Rd.), Union Pacific Rail Road tank site and spill remediation project (1717 Middle Harbor Rd.), Sealand Services (1425 Maritime Street), and any other marine terminal site that you would like to discuss. Dan Shoenholz of the Port Environmental Department will also be attending the meeting. He will also have a number of sites to discuss with you.

You can reach Dan with any questions regarding the sites that he is managing at 272-1220. I can be reached at 272-1184. I would like to meet as soon as we can schedule it. Monday, Wednesday, or Friday would be the best days to meet. I will be out of town from May 18 through May 30, 1994. If possible, I would like to schedule the meeting prior to going on vacation. Please let me know where you would like to meet and at what time. Thank you for your help.

Sincerely,

Jon Amdur

Environmental Scientist

cc: Paul Smith ACDEH, 30 Swan Way, Suite 200, Oakland, CA 94621 Barney Chan ACDEH, 80 Swan Way, Suite 200, Oakland, CA 94621

Neil Werner (Environmental)
Dan Shoenholz (Environmental)
James McGrath (Environmental)

DWIGHT R. HOENIG

Vice President Western Regional Director

San Francisco Regional Office

1252 Quarry Lane P.O. Box 9019 Pleasanton, CA 94566 (510) 426-2686 Fax (510) 426-1057 Clayton
ENVIRONMENTAL
CONSULTANTS

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Port of Oakland 530 Water Street Oakland, CA 94607 Telephone (510)272-1174 Fax (510)465-3755

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DEPARTMENT OF TOXIC SUSTANCES CONTROL HARLING CO.

400 P Street, 4th Floor P.O. Box 806 Sacramento, CA 95812-0806

(916) 323-6042

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REGINE TO. 1993

Ms. Patricia Murphy Port of Oakland 530 Water Street Oakland, California 94607

PORT OF OAKLAND - BERTH 30 WASTE CLASSIFICATION REQUEST (WEU File #F-133)

Dear Ms. Murphy:

The Department of Toxic Substances Control (Department) has completed its review of the March 4, 1993, application prepared by Geomatrix consultants, Incorporated (Geomatrix) on behalf of the Port of Oakland, the owner of the Berth 30 site (Berth 30). The application is a request to classify lead-contaminated material which was excavated from Berth 30 as nonhazardous per the provisions of Section 66260.200(f), Title 22, California Code of Regulations (22 CCR). Wastes which are non-RCRA hazardous wastes may be classified, pursuant to the provisions of Section 66260.200(f), 22 CCR, as nonhazardous, upon approval from the Department if the waste can be shown to possess mitigating physical and/or chemical characteristics which render it insignificant as a hazard to human health and safety, livestock, and wildlife. This letter is a notification that the Department approves your application to classify and manage the lead-contaminated material as nonhazardous waste pursuant to Section 66260.200(f), 22 CCR, provided it is disposed at the Class II landfill, as stated in your application, which will be constructed at the Port of Oakland.

BACKGROUND

Your application states that the contaminated material was excavated during the Fall of 1992 during construction of a new terminal and loading berth. The material consists of a heterogeneous mixture of rubble, boulders, cobbles, gravel, sand, clay, brick, timber, and other miscellaneous materials. The material was moved to another location at the Port where the hazardous portions of the material were combined into one pile consisting of a volume of approximately 26,700 cubic yards.

The March 4, 1993, application prepared by Geomatrix Consultants stated that the waste material was contaminated with lead which had an average soluble lead extract concentration which exceeded the Soluble Threshold Limit Concentration (STLC) of 5.0 mg/l



Ms. Patricia Murphy June 10, 1993 Page 2 pursuant to Section 66261.24(a)(2)(A), 22 CCR. On May 11, 1993, the Department requested that additional information be provided relating to the characteristics of reactivity, corrosivity, and ignitability and for additional information regarding the mitigating physical and/or chemical characteristics of the waste material which renders the wastestream insignificant as a hazard to human health and safety, livestock, and wildlife. On May 18, 1993, Geomatrix submitted data to the Department which addressed the request for additional information. ANALYTICAL TESTING Sampling activities from the Berth 30 site were completed by Geomatrix in December, 1992. Collected samples were subjected to the following analytical testing: 12 samples were analyzed for pH pursuant to Section 1) 66261.22, 22 CCR; 12 samples were analyzed for ignitability by a modified 2) ignitability test method pursuant to Section 66261.21, 22 CCR; 12 samples were analyzed for the presence of reactive 3) sulfides and cyanides pursuant to Section 66261.23, 22 CCR; 120 samples were subjected to the Toxicity 4) Characteristic Leaching Procedure (TCLP) for soluble lead pursuant to Section 66261.24(a)(1), 22 CCR; 12 samples were subjected to an acute aquatic bioassay 5) pursuant to Section 66261.24(a)(6), 22 CCR; 120 samples were analyzed for soluble lead as measured 6) by the Waste Extraction Test (WET) pursuant to Section 66261.24(a)(2), 22 CCR; 3 samples were analyzed for soluble mercury as measured 7) by the Waste Extraction Test (WET) pursuant to Section 66261.24(a)(2), 22 CCR; 120 samples were analyzed for total concentrations of 8) inorganic persistent and bioaccumulative substances pursuant to Section 66261.24(a)(2)(A), 22 CCR; 12 samples were analyzed for total concentrations of 9) organic persistent and bioaccumulative substances pursuant to Section 66261.24(a)(2)(B), 22 CCR.

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ANALYTICAL RESULTS

Results from the above analytical procedures, combined with generator knowledge of the wastestream, have yielded the following results:

- The waste material does not exhibit the characteristics of corrosivity, reactivity, or ignitability;
- 2) Acute Oral, Dermal, Inhalation, and Aquatic Toxicity:
 The waste does not exhibit the characteristics of acute
 oral, dermal, or inhalation toxicity and is not
 aquatically toxic.
- Persistent and Bioaccumulative Toxic Substances WET-soluble lead was found at a mean concentration of 6.9 mg/l with an 80 percent upper confidence level (UCL) of 7.48 mg/l. Both the mean and 80 percent UCL of WET-soluble lead concentrations are above the STLC of 5 mg/l. Other than WET-soluble lead, no other inorganic or organic persistent or bioaccumulative substances were found above their respective hazardous waste regulatory thresholds listed in Section 66261.24 subsections (a) (1) (B), (a) (2) (A), or (a) (2) (B) 22 CCR.

DISCUSSION

Geomatrix has demonstrated to the Department that the lead in the waste material has a low mobility because of the presence of oxides, the percent of organic matter, and the grain size. The Department established the STLC regulatory levels to protect public health and the environment by safeguarding sensitive aquifers from contamination by persistent and bioaccumulative substances, including lead. The Department believes that the relative immobility of the lead in the Berth 30 waste material, combined with a management scenario which includes the disposal of the material in a Class II landfill, will afford the necessary protection.

CONCLUSION

The Department has determined that, based upon the evaluation of the data submitted with your application, the material excavated from the Berth 30 site possesses mitigating physical and/or chemical characteristics which render it insignificant as a hazard to human health and safety, livestock, and wildlife. The Department, therefore, grants approval to the Port of Oakland to classify and manage the approximately 26,700 cubic yards of lead-contaminated material excavated from the



November 12, 1992

Mr. Don Hwang Alameda County Health Care Services Agency Hazardous Materials Division 80 Swan Way, Rm. 200 Oakland, CA 94621

Dear Mr. Hwang:

SUBJECT: DEPOSIT/REFUND ACCOUNT FOR COUNTY OVERSIGHT OF PETROLEUM HYDROCARBON CLEANUP AT BERTH 30/POWERINE

Enclosed please find a check for \$1065 which constitutes the deposit requested by the County for review and oversight of the Port's cleanup of hydrocarbon contamination at the old Powerine Oil site.

If you have any questions, please contact me at 272-1220.

Sincerely,

Dan Schoenholz

Assistant Port Environmental Scientist

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Enclosure

pc/powerine.chk/wp51



Ariu Levi Division of Hazardous Materials Alameda County Department of Environmental Health 80 Swan Way, Room 200 Oakland, CA 94621

Dear Mr. Levi:

The Port has obtained analytical results from soil sample composites that were obtained from a portion of the Berth 30 shoreline that show levels of lead exceeding the California Code of Regulations' Title 22 threshold for hazardous waste. The attached site map shows the location of Berth 30 and the specific location where sampling took place.

The first round of sample analysis showed that Sample Areas B and D had elevated levels of lead based on one sample composite, per sample area, made up of twelve and ten discrete samples respectively. These results showed lead was the only contaminant above background levels. A second round of analysis was performed on the individual samples from Areas B and D. Sample analysis from Area B showed soluble lead levels below the Title 22 threshold; all ten samples from Area D showed lead levels exceeding the Title 22 threshold.

The Port is currently preparing a sampling plan that will constitute a more statistically representative characterization of the lead levels present in Area D. Further sampling will take place within the next two weeks. We will transmit the analytical results of this sampling effort to you as soon as they are available.

If you have any questions regarding this issue, please do not hesitate to contact me at 272-1175, or Patricia Murphy of my staff at 272-1373.

Sincerely,

James McGrath

Manager, Environmental Department

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Enclosures: 1) Site Map and Sample Plan

2) Laboratory Results

cc: Steve Ritchie, RWQCB

ALAMEDA COUNTY HAZARDOUS MATERIALS DIVISION DEPOSIT / REFUND ACCOUNT SHEET

printed05/19/97

REPORT: WrkShtC (Continued balance

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Port Of Oakland			PROJECT#: 1255A PROJECT TYPE:*** M ***		
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Site Contact: Site Phone :			ACCI. SHEET PG #:		
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