

## Nowell, Keith, Env. Health

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**To:** jrubin@portoakland.com  
**Cc:** jjones@portoakland.com; Hollis.Phillips@arcadis-us.com; Roe, Dilan, Env. Health  
**Subject:** Fuel Leak Cases RO0000010-Port of Oakland- and RO0000187- Port of Oakland/ Nations Way Transport, both addressed as 651 Maritime Street, Oakland

Dear Mr. Rubin,

Thank you, Jeffrey Jones of the Port of Oakland, and Hollis Phillips of ARCADIS U.S. Inc. (ARCADIS) for participating in the meeting today regarding fuel leak cases for Port of Oakland and Port of Oakland/ Nations Way Transport, 651 Maritime Street, Oakland, Alameda County Environmental Health (ACEH) case numbers RO0000010 and RO0000187 (collectively referred to as the Site). ACEH staff has reviewed the case files including the *Low-Threat Closure Policy Summary* (PS-RFC) dated October 7, 2013, which was prepared by ARCADIS for the subject Site. The PS-RFC document indicates the Site is adequately characterized, that there are no data gaps, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) general and media specific criteria are satisfied. As discussed in the meeting today, ACEH does not concur with the PS-RFC closure request and the analysis supporting plume stability and vapor intrusion risk.

ACEH requests you perform a file review and present your findings as part of a Focused Site Conceptual Model to address the following:

1. Timeline addressing building demolition (including lead and asbestos survey findings), fill placement (fill source and analytical data), on-site building construction, and proposed off-site redevelopment;
2. Documentation of the soil-gas vapor intrusion system including methane sensor installation and system performance (if applicable);
3. A list of monitoring and remediation wells and former wells at the Site. Include well construction details, well status, and a well screen evaluation;
4. A narrative of well identification nomenclature as the duplicate well identification numbers from the adjoining Port of Oakland (RO0000010) and Port of Oakland/ Nation Ways Transport (RO0000187) were combined into one case file;
5. A cumulative table presenting groundwater monitoring data, including depth-to-water, laboratory analysis, presence/absence of free product, and well screen submergence;
6. An analysis of the varying groundwater flow directions reported at the Site and a rose diagram;
7. A summary of the history of free product removal at the Site, including cumulative product removal tables;
8. An assessment of dissolved metals concentrations;
9. Verification of the adequacy of Risk Assessment against current standards (including model version and inputs and outputs);
10. Sub-slab and vent soil gas data (if available);
11. Figures using an aerial photograph base showing boring and well locations and an overlay with former building, current buildings, and former tank locations;

As discussed in the meeting, provide ACEH with a due date for the submittal of a Focused Site Conceptual Model to address the afore-mentioned data gaps. Additionally please upload the Port of Oakland Health and Safety Plan to the case electronic database

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. 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/top/ust.htm>