



PORT OF OAKLAND

December 5, 2011

Ms. Donna Drogos, P.E.
LOP Program Manager
Alameda County Environmental Health Department
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

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8:41 am, Dec 06, 2011

Alameda County
Environmental Health

Mr. Parish Khatri,
Hazardous Materials Specialist
Alameda County Environmental Health Department
Environmental Protection
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

**Subject: Former Underground Storage Tank Site
2700 Seventh Street, Oakland, CA
Fuel Leak Case No. RO0000059**

Dear Ms. Drogos & Mr. Khatri:

The Port of Oakland ("Port") acknowledges receipt of a letter from Alameda County Environmental Health ("ACEH") dated September 30, 2010, requesting methyl tertiary butyl ether ("MTBE") analysis for soil and groundwater at the former underground storage tank ("UST") site ("Site") known to the Port as CF-31 or 2700 Seventh Street, Oakland, California and also requesting that electronic copies of all relevant reports associated with environmental investigations for this Site be uploaded on GeoTracker. The Port uploaded the reports to GeoTracker on November 22, 2010.

The Site and Regulatory History

The former UST was a 15,000-gallon steel tank that was removed by the Port in November 1988 prior to redevelopment of the Site and surrounding area from a grain milling, storage, and shipping facility operated by Albers Milling Company into a marine cargo terminal. The UST was removed as part of the overall demolition activities of the former grain mill. The UST formerly contained diesel fuel which was used for refueling trucks and heavy equipment. During the UST removal in 1988, hydrocarbon odors were

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detected at the southern end of the Site. However, no evidence of UST integrity compromise such as corrosion, punctures or leaks was noted. Four soil samples were collected: one from under each end of the UST and two sidewall samples. The analytical results for the soil samples indicated the presence of Total Petroleum Hydrocarbons ("TPH") as gasoline at 3,800 milligrams per kilogram ("mg/kg") in one location along with Benzene at 1.1 micrograms per kilogram ("µg/kg"), Toluene at 7.4 µg/kg, Xylenes at 116.0 µg/kg, and Ethylbenzene at 2.5 µg/kg. A heavier hydrocarbon in the C12 to C14 range was also detected at 2,600 mg/kg. By a letter dated January 11, 1989, ACEH directed the Port to excavate all soils exceeding 1,000 mg/kg TPH and dispose of the soil as hazardous waste at an approved disposal facility. Port consultant, Baseline Environmental Consulting ("Baseline"), completed the soil removal which was documented in a report dated March 1989 ("Baseline Report").

ACEH's letter to the Port dated March 19, 1996 indicated that the Site had been transferred on December 6, 1995 to the Alameda County Local Oversight Program ("LOP") and directed the Port to submit a work plan designed to define the extent of the petroleum hydrocarbon contamination release. In June 1996, the Port submitted a Soil and Water Investigation Work Plan prepared by Port consultant, Innovative Technical Solutions Inc. ("ITSI"), which included a task to locate the former UST Site. In September 1996, the Port attempted to locate the Site through a combination of examination of old aerial photographs and the scaling of position from the location figure from the Baseline Report followed by a geophysical investigation utilizing a magnetometer and ground penetrating radar ("GPR") to verify the location. ITSI reported that the survey work was inconclusive for identifying the Site location.

Currently the former UST Site is still developed as a marine cargo terminal and will remain as such for the foreseeable future.

Proposed Limited MTBE Soil and Groundwater Investigation

The Port, through its consultant, AECOM Technical Services ("AECOM"), is proposing to conduct a limited soil and groundwater investigation designed to meet the requirements of ACEH's letter dated September 30, 2010 for evaluation of Site closure. The ACEH letter states that "According to Section 25299.37.1 no closure letter pursuant to this chapter shall be issued unless the soil and groundwater, or both, where applicable, at the site have been tested for MTBE and the results of that testing are known to the regional board".

AECOM will, with the Port's assistance and based on the ITSI geophysical investigation, try and locate the location of the former UST excavation Site. Once a location has been agreed upon by AECOM and the Port, the Site will be cleared for underground utilities

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and AECOM will advance a total of three (3) soil borings to sample first encountered groundwater, collect soil grab samples and analyze the soil and groundwater samples for MTBE. Two of the soil borings will be advanced near the southern end of the former UST excavation pit and the third will be advanced in the middle of the excavation.

The Port would like to schedule a meeting with you, the Port, and AECOM to discuss our approach in order to satisfy the requirements of ACEH's letter dated September 30, 2010 and proceed with obtaining Site closure of Fuel Leak Case No. RO0000059.

Please contact me at 510-627-1373 to discuss an appropriate time to meet. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink that reads "John Prall". The signature is written in a cursive, flowing style.

John Prall PG, Port Associate Environmental Scientist
Port of Oakland Environmental Programs & Planning Division

I declare under penalty of perjury that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge.

CC: Luis Fraticelli, AECOM Technical Services
Anne Whittington, Port of Oakland
Michele Heffes, Port of Oakland
Deborah Ballati, Farella Braun + Martel