

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
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February 21, 2018

Port of Oakland
530 Water Street
Oakland, CA 94607
Attention: Mr. Eric Englehart
(Sent via electronic mail to eenglehart@portoakland.com)

Subject: Conditional Work Plan Approval, Fuel Leak Case No. RO0000059 and GeoTracker Global ID T0600101098, Port of Oakland/ Albers Mill/ Berth 30, 2700 7th Street, Oakland, CA 94607

Dear Mr. Englehart:

Thank you for the recent submittal of the document entitled *Data Gap Work Plan and Focused Site Conceptual Model- Revised* (Work Plan) dated January 29, 2018 and prepared by Amec Foster Wheeler Environment & Infrastructure (Amecfw) for the subject case. The Work Plan was prepared at the request of Alameda County Department of Environmental Health (ACDEH) staff in our meeting with you and Diane Heinze of the Port of Oakland and Gary Lieberman of Amecfw.

As indicated in the meeting, ACDEH concurs with the methodology used to locate the general location of the underground storage tank (UST) pit. However, uncertainty remains as the UST removal report, entitled *Documentation for the Underground Tank Removal* (UTR) dated March 7, 1989 and prepared by Baseline Environmental Consulting (Baseline), reported an 8-inch waterline along the southern edge of the tank pit. Documents provided at the meeting included utility maps. No waterlines were depicted in the vicinity of the suspect tank pit location. Additionally, the UTR indicated the site may have contained a 10,000-gallon UST. As an attempt to locate the tank was unsuccessful, it is not known if it had been previously removed. Hence, if the geophysical survey identifies a UST pit outside of the suspected location, the pit may not be associated with this case. Contents of the 10,000-gallon UST was not identified.

As presented in the Work Plan, Amecfw proposes two phases of work. The first phase consists of a geophysical survey to refine the suspected UST pit and the former fuel dispenser locations. The survey will consist of three geophysical methods - ground penetrating radar (GPR) and or equivalent, radio-frequency utility location (RF), and electromagnetic metal detection (MD). Following the geophysical survey, Amecfw will discuss the survey findings with ACDEH.

Amecfw has tentatively proposed advancing five soil bores for the second phase of work. The exact number and locations of the bores will be determined based on the findings of the geophysical survey and conversation with ACDEH. The bores will be advanced for the collection of soil and grab-groundwater (GGW) samples.

Amecfw proposes that one soil sample will be collected within the 0- to 5-foot depth interval of each boring based on visual evidence of contamination, petroleum odor, elevated photoionization detector readings, lithologic changes, or at approximately 2.5 feet below the ground surface (bgs) if no evidence of contamination or lithologic changes are observed. A second soil sample will be collected from each boring just above the soil/water interface. A GGW sample will be collected from each of the bores.

Recovered soil and GGW samples will be analyzed for gasoline and diesel range organics (GRO and DRO) by Environmental Protection Agency (EPA) Test Method 8015 and for benzene, toluene, ethylbenzene, and

xylenes (collectively BTEX) and methyl tertiary butyl ether (MTBE) by EPA Test Method 8260. Additionally, GGW samples will be analyzed for naphthalene and polycyclic aromatic hydrocarbons (PAHs) by EPA Test Method 8310.

Alameda County Environmental Health (ACDEH) has reviewed the case file and the Work Plan in conjunction with the State Water Resource Control Board's (SWRCB) *Low-Threat Underground Storage Tank Closure Policy* (LTCP). ACDEH generally concurs with the proposed scope of work and requests that you address the following technical comments, perform the proposed work, and send us the technical reports described below.

TECHNICAL COMMENTS

- 1. Soil Bore Locations** – Following our review of the geophysical survey, ACDEH will request a work plan addendum consisting of a figure depicting the proposed soil bore locations. Execution of the work plan, incorporating our technical comments below, may proceed following our review and approval of the work plan addendum.
- 2. Soil Sample Collection Criteria** – ACDEH requests soil samples be collected within the 0- to 5-foot and 5- to 10-foot bgs intervals for evaluation with the LTCP media specific criteria for Direct Contact and Outdoor Air Exposure. Additionally, ACDEH recommends that soil samples be collected and analyzed at intervals of no more than five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the fuel hydrocarbon concentrations within this interval. Please ensure that the analytical results define the vertical extent of total petroleum hydrocarbon (TPH) impacts at the site.
- 3. Scope of Analyses** – The UTR identifies the UST as used for the storage of diesel fuel. ACDEH notes that GRO was reported at 3,800 milligrams per kilogram (mg/kg) in soil sample TA-1, suggesting the UST may have also been used for the storage of gasoline fuel. The SWRCB Leaking Underground Fuel Tank (LUFT) Guidance Manual (September 2012) identifies the scope of analysis for gasoline fuel as GRO, BTEX, naphthalene, MTBE, and tertiary butyl alcohol (TBA). As the tanks were removed in 1988 when lead was being used as a fuel additive, please include the lead scavengers 1,2-dibromoethane (EDB) and 1,2-dichloroethane (EDC).

The LUFT manual identifies the scope of analysis for diesel fuel as DRO, BTEX, and naphthalene.

Therefore, ACDEH requests the soil and GGW samples be analyzed for GRO, DRO, BTEX, MTBE, TBA, naphthalene, EDB, and EDC.

- 4. Silica Gel Cleanup** – As presented in the Work Plan, Amecfw's proposed scope of analysis includes DRO. However, the use of silica gel cleanup (SGC) for this analysis is not discussed. Therefore, ACDEH would like to present its position regarding SGC.

The San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) does not utilize SGC when evaluating concentrations of DRO with the Environmental Screening Levels (ESLs). For consistency, ACDEH follows the SFBR-RWQCB lead when evaluating cases having DRO concentrations with regard to risks to human or ecological receptors, including our LTCP evaluation. Therefore, DRO analyses should be performed without SGC for evaluation of risks to human or ecological receptors. However, ACDEH acknowledges that useful information may be gathered when comparing TPH concentrations for a sample analyzed both with and without SGC. Therefore and at your discretion, SGC may be used on selected samples for comparison with non-SGC concentrations.

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ACDEH requests that the analysis of DRO reflect this position.

ACDEH requests that you provide the information and/or submit the documents by the dates specified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the SWRCBs GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **March 19, 2018 – Geophysical Survey Report** – Discussion of findings with ACDEH
- **April 2, 2018 – Work Plan Addendum** (figure provided via electronic mail, Attention: Keith Nowell)
- **July 9, 2018 – Soil and Groundwater Investigation Report** (file name: RO0000059_SWI_R_yyyy-mm-dd)

Thank you for your cooperation. ACDEH 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

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements/Obligations

cc: Diane Heinze, Port of Oakland, 530 Water Street, Oakland, CA 94604-206 (*Sent via electronic mail to: dheinze@portoakland.com*)

Gary Lieberman, Amec Foster Wheeler Environment & Infrastructure, Inc., 1670 Corporate Circle, Suite 101, Petaluma, CA 94954 (*Sent via electronic mail to gary.lieberman@woodplc.com*)

Dilan Roe, ACDEH, (*Sent via electronic mail to: dilan.roe@acgov.org*)

Paresh Khatri, ACDEH, (*Sent via electronic mail to: paresh.khatri@acgov.org*)

Keith Nowell, ACDEH (*Sent via electronic mail to: keith.nowell@acgov.org*)

Geotracker, File

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.