

September 23, 2005

Mr. Barney Chan Hazardous Materials Specialist Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577



RE: Status Update – Additional Monitoring Wells and Risk Management Plan — 2225 and 2277 Seventh Street, Oakland, California

Dear Mr. Chan:

This letter provides a status update regarding additional monitoring wells and the risk management plan (RMP) for the Port of Oakland (Port) 2225 and 2277 Seventh Street site (site). This site is the location of the new Harbor Facilities Center (HFC), previously known as the Port Field Support Services Complex (PFSSC). This letter follows up on my previous update letter to you dated July 19, 2005, and is being submitted in accordance with County requirements.

BACKGROUND

Several soil and groundwater investigations have been performed as a result of former underground storage tank releases of diesel and gasoline fuel. As a result of these fuel releases, separate phase petroleum hydrocarbon product has been identified floating on the groundwater table. Petroleum hydrocarbons, volatile organic compounds and methane in soil, soil gas and groundwater were also identified beneath the site. The Port's environmental consultant, Treadwell & Rollo, Inc., designed a soil-gas venting system to mitigate this risk beneath the building. A free product recovery system was also designed by Treadwell & Rollo to recover the product floating on the groundwater table beneath the site.

Final "as built" drawings and an operation and maintenance (O&M) manual were prepared for the soil gas venting and free product recovery systems. The "as built" drawings were submitted to you with previous correspondence dated July 18, 2005.

Installation of Additional Monitoring Wells

The final site remedial action plan prepared in May 2002 by the Port's consultant, Innovative Technical Solutions, Inc. (ITSI), proposed that eight replacement monitoring wells be installed after the new free product recovery system was in place. These monitoring wells were proposed to replace former and existing monitoring wells on site, although the location and number of replacement monitoring wells is

¹ Innovative Technical Solutions, Inc., Additional Site Characterization and Remedial Action Plan for 2275 and 2277 Seventh Street, Oakland, California, May 2002; page 11.

now being reevaluated. Several of the existing monitoring wells that undergo quarterly testing could potentially serve this purpose, thereby limiting the number of new well installations. Before any decisions can be made on the number and placement of any additional wells, site conditions need to be evaluated following a full year of operation, maintenance, and calibration of the free product recovery system. A year of testing and calibration will have elapsed at the end of December 2005. As a result, new monitoring wells will be installed during the first quarter of 2006.

Risk Management Plan

During the planning stages for development of the new HFC, the Port prepared a Human Health Risk Assessment (HHRA), approved by all regulatory agencies. Worker protection during construction of the HFC was described in a Health and Safety Plan, based in part on the final HHRA. In addition, upon completion of the HFC, precautions for subsequent subsurface construction activities were to be described in a Risk Management Plan (RMP) for the entire site. Preparation and submittal of this RMP will be coordinated with the proposed number and placement of additional monitoring wells, as described above during the first quarter of 2006.

If you have any questions, please call me at (510) 627-1134.

Sincerely,

Jeffrey L. Rubin, CPSS, REA

Port Associate Environmental Scientist Environment and Safety Department

Cc:

Rachel Hess, Innovative Technical Solutions, Inc.

Chris Alger, Iris Environmental

Glenn Leong, Treadwell & Rollo, Inc.

Jeff Ludlow, Treadwell & Rollo, Inc.

Yane Nordhav (Baseline Environmental)

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Michele Heffes, Port Legal Department

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Jeff Jones, Port Environment and Safety Department

Roberta Reinstein, Port Environment and Safety Department

² Preparation of a Risk Management Plan ("RMP") - Letter to Barney Chan, Alameda County Health Care Services Agency from Jeff Rubin, dated 7 March 2003.