

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Friday, September 26, 2014 5:46 PM  
**To:** Gopal Nair (gnair@oaklandnet.com)  
**Cc:** dheinze@portoakland.com; Charles Pardini (chuck.pardini@arcadis-us.com); 'xtong@otgenv.com'; Roe, Dilan, Env. Health  
**Subject:** FUEL LEAK CASE RO293 - CITY OF OAKLAND MUNICIPAL SERVICE CENTER, 7101 EDGEWATER DRIVE, OAKLAND

Dear Mr. Nair,

Alameda County Environmental Health (ACEH) has reviewed the case file and the recently submitted document entitled *Work Plan to Address Data Gaps* (Work Plan), dated July 31, 2014, and prepared by ARCADIS U.S. Inc. (ARCADIS) for the subject site. The Work Plan was prepared in response to an ACEH directive dated March 26, 2014 following a meeting with you, ARCADIS representative Charles Pardini, Xinggay Tong of OTG, and Port of Oakland representative Diane Heinze held on March 25, 2014.

ACEH 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. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

### Technical Comments

- Well Survey- The Work Plan proposes to survey several wells in the network which have not been previously been surveyed. Additionally, the Work Plan proposes to replace monitoring well MW-16 and to inspect OB-C1 to determine if this well needs to be replaced. ACEH recommends the well survey be delayed until the replacement wells MW-16 and OB-C1, if determined appropriate, are installed.

Well surveys should be conducted in accordance with California State Water Resources Control Board (SWRCB) requirements for uploads to GeoTracker.

- Well Assessment- Several wells identified for sampling in the Work Plan have not been sampled for many years, if sampled at all. ACEH requests a well assessment to determine if it is appropriate for a well in the network be developed or redeveloped prior to sampling. Please review the well construction diagrams prior to tagging the well. If a significant amount of sediment is determined to be present at the base of the well, the well should be redeveloped prior to sampling.
- Plume Delineation- The light non-aqueous phase petroleum hydrocarbon (LNAPL) plume is proposed to be delineated in the field using OIL-IN-SOIL, a field screening tool. The OIL-IN-SOIL test is not an approved EPA test method. In addition to the analytical testing presented in the Work Plan, please analyze a sufficient number of soil samples to verify the outcome of the OIL-IN-SOIL field screening. Verification laboratory analytical testing for soil samples showing no reaction or little reaction to the OIL-IN-SOIL test should also be performed.
- Polycyclic Aromatic Hydrocarbons (PAHs)- Data Gap Item 8a states locations presented in Work Plan on Figures 3a and 3b which are circled in blue will be sampled for PAHs, while the Figures 3a and 3b state that these sample locations *may* be sampled for PAHs. ACEH requests the PAH analysis be performed on the designated blue circled samples depicted on Figures 3a and 3b.
- Report Preparation- Please include a site map using an aerial photographic base showing the site and nearby features. Include on the figure a rose diagram, well and boring locations, existing and former underground

storage tank (UST) locations labeled with tank capacity and contents, and the estimated plume boundary. Identify nearby potential receptors on the site map.

### Technical Report Request

Please upload the requisite data and documents to the SWRCB's Geotracker website and ACEH's FTP site according to the following naming convention and schedule:

- **December 29, 2014** – Geotracker Well Data Electronic Deliverables – (GEO\_BORE, GEO\_XY and GEO\_Z)
- **December 29, 2014** – Soil and Water Investigation Report – RO0000293\_SWI\_yyyy-mm-dd

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>