PORT OF OAKLAND

August 10, 2011

Ms. Julie Straub
UPS Corporate Plant Engineering
55 Glenlake Parkway NE
Atlanta, GA 30328

RE: UPS- Oakland Hub
Groundwater Monitoring Report

Dear Ms. Straub:

We are in receipt of the document *"Groundwater Monitoring Report, UPS Oakland Hub,"* prepared by your consultant Arcadis, and dated July 20, 2011. Please see below a list of concerns that we have regarding the report:

- Arcadis indicates that monitoring well 16 (MW-16) had free product and, therefore, was not purged or sampled, however, Arcadis does not show the location of MW -16 in the figures provided in the current report or previous *"Summary of Soil and Groundwater Investigations Report,"* dated February 15, 2011. Please revise the report to include MW-16 in Figures 3, 4, and 5 of the document.

- Arcadis indicates that heavy-range diesel detected at the site, outside of the immediate vicinity of the former underground storage tanks ("USTs"), is related to the historic fill instead of weathered diesel. However, diesel contamination caused by UPS has existed at the site since at least 1989, and has migrated away from the source site. Arcadis has not provided soil boring data that would indicate the fill at the site contained creosote-containing hydrocarbons prior to the release by UPS. Please conduct baseline soil borings outside of the area of contamination to assess the quality of the fill material in the vicinity of the site.

- In a letter from Barbara Jakub of the Alameda County Health Care Services Agency ("ACHCSA"), dated March 10, 2009 (enclosed for your convenience), she requests a preferential pathway study in the area of the former USTs. Although you show the utilities in the area, please have your consultant collect soil or groundwater samples immediately adjacent to the utilities to confirm they are not a preferential pathway for off-site migration of the diesel contamination.

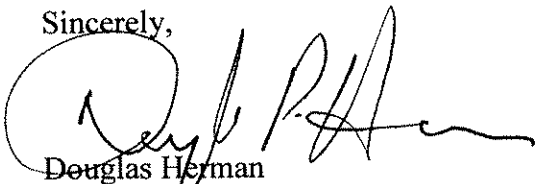
- The report indicates that purge water was poured through granulated activated carbon in a five gallon buckets and then disposed to the asphalt pavement on-site.

Please provide the Port with all analytical data collected for the purge water which was treated on-site. In addition, the Port requests copies of all regulatory permit(s) required to perform the on-site treatment and disposal of this waste stream. In the future, please direct Arcadis to store all purge water in DOT-approved hazardous waste containers, and properly dispose of the purge water off Port property. In addition, please provide the Port copies of the analytical data and any hazardous waste manifest(s) or other waste profile sheets for the disposal of the purge water in all future groundwater monitoring reports.

- In the report, Arcadis recommends that diesel-impacted soil and groundwater be allowed to remain on-site and concentrations be reduced through natural attenuation. Arcadis has failed to provide sufficient evidence that the groundwater plume is stable, is receding, and that natural attenuation can effectively remediate the groundwater plume in a timely manner. Ms. Jakub also indicates in her letter that separate phase hydrocarbons are still present in OW-1 despite remediation via oxygen release compounds and monthly product bailing. Monthly product bailing has been on-going since 2003. The Port requests that UPS provide a detailed work plan for active remediation of the soil and groundwater at the site, which should include excavation and removal of contaminated soil and/or groundwater. Please provide the work plan by September 16, 2011.

We look forward to your response to the items indicated above. If you have any questions, please do not hesitate to contact me at (510) 627-1184 or dherman@portoakland.com.

Sincerely,



Douglas Herman
Environmental Scientist
Port of Oakland
Division of Environmental Programs and Planning

Encl.: Letter from Barbara Jakub, ACHCSA to Julie Straub of FedEx and dated March 10, 2009.

Cc w/o encl: Barbara Jakub, ACHCSA
Hugh Devery, Arcadis
Michele Heffes
Michael Lee
Christine Noma
Deborah Ballati