



PORT OF OAKLAND

Alameda County

MAR 08 2010

Environmental Health

March 5, 2010

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

**RE: UPS- Oakland Hub
Underground Storage Tank Removal Field Activities Observation
Report**

Dear Ms. Straub:

Please find enclosed the report entitled *Underground Storage Tank Removal Field Activities Observations, UPS Facility, 8400 Pardee Drive, CA* ("Report") dated June 11, 2009 and prepared by URS Corporation on behalf of the Port of Oakland ("Port"). The Report documents observations made during field activities associated with the removal of three underground storage tanks ("USTs") at the UPS facility located at 8400 Pardee Drive, Oakland, California. The USTs were owned and operated by UPS, and removed by UPS's consultant Arcadis. UPS leases the property from the Port.

In the Report, URS notes:

"Tank removal field activities were conducted in general accordance with the Work Plan (prepared by Arcadis and dated March 26, 2009). However, URS observed several inconsistencies with respect to adherence to the Work Plan and the standard of care employed by professionals conducting similar work in this industry."

The major inconsistencies with respect to the Work Plan were the following:

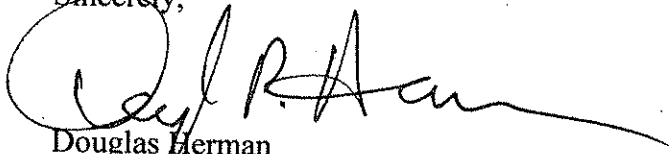
- The USTs were not observed by URS to have been washed prior to off-site disposal;
- Because it was unclear whether all backfill sources were sampled and analyzed, it cannot be confirmed that all backfill was clean;
- Backfilling was not performed in 12-inch lifts, as prescribed in the Work Plan, and no compaction testing was performed during backfilling; therefore, it cannot be confirmed that backfill was compacted to 90 percent;
- Stockpile sampling was not conducted in accordance with City of Oakland Office of the Fire Marshal requirements, as described in the Work Plan (i.e., one four-point composite for every 75 to 100 cubic feet);

- Sidewall sampling was not conducted in accordance with the Work Plan, because the UST bottoms were submerged in groundwater;
- Impacted soil was left in place and was not over-excavated; and
- Stockpile 2 may not have been sampled and analyzed prior to use as backfill or off-site disposal.

At your earliest convenience, but no later than March 22, 2010, please respond to each of the discrepancies noted above, and how they will be remedied during future site activities.

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
Environmental Programs and Planning

Encl.: Underground Storage Tank Removal Field Activities Observations, UPS Facility,
8400 Pardee Drive, CA

Cc w/o encl: Barbara Jakub, ACHCSA
Hugh Devery, Arcadis