Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Thursday, March 05, 2015 11:08 AM
To: Doug Herman (DHerman@PortOakland.com)
Cc: dheinze@portoakland.com; Lydia Huang (lydia@baseline-env.com); Roe, Dilan, Env. Health
Subject: Site Cleanup Program case RO414 - MOIA, UNITED AIRLINES MF35/36, 1100 Airport Drive, Oakland

Dear Mr. Herman,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Technical Memorandum* (TM) dated November 14, 2014, which was prepared by Baseline Environmental Consulting (Baseline) for the subject site. The TM was prepared to respond to ACEH's request, dated October 15, 2014, to explain why it is acceptable to have exceedances for ecological receptor environmental screening levels (ESLs) for total petroleum hydrocarbons (TPH) in AOC 1, AOC 2, and AOC 3 and for metals in AOC 1, AOC 2, AOC 3, AOC 5, AOC 7, AOC 8, AOC 9, AOC 14, and AOC 17. The referenced exceedance concentrations were adjusted using dilution attenuation factors (DAFs) based on distance to the nearest storm water drainage ditches.

The approach presented in the TM is to switch the ESLs from the formerly used screening levels found in ESL Table F-2c, Surface Water Screening Levels – Estuary Habitats to the less conservative Fresh Water Habitats (ESL Table F-2a). Justification for the change in receptor habitat was based on electrical conductivity measurements from the most recent comprehensive sampling event for the groundwater monitoring well network conducted in June 2006.

ACEH is of the opinion the electrical conductivity data does not support a fresh water determination and disagrees with the approach used to raise the ESLs to meet the data. The pre- and post- purged electrical conductivity data presented in Table 1 ranged from 430 microSiemens per centimeter (mS/cm) to 22,4000 mS/cm. These concentrations are indicative of brackish to salty water; hence, do not support a fresh water habitat determination. However, they do support the estuary habitat determination.

It has been demonstrated that residual petroleum hydrocarbon and metal contamination remain in the subsurface. As the site is covered with either pavement or structures, it is ACEH's opinion that the question to be addressed is the mobility of the contamination. DAFs aside, if it can be demonstrated that the residual contamination is not migrating off site, or if migrating, at concentrations not adversely affecting ecological receptors, it is ACEH's position the site may be eligible for closure.

Therefore at this junction, ACEH requests a data review be performed in order to evaluate plume stability in the direction of the storm water channels to the northeast of the site. This may best be achieved by reviewing the contaminant concentrations in the interior monitoring wells and in the perimeter monitoring wells in order to establish if off site migration is occurring. A data comparison relative to concentration found in interior wells may aid in the evaluation. Please evaluate the site for plume stability and submit your findings and recommendations in the report requested below. Include a discussion of other site conditions that may support your conclusions.

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **May 5, 2015– Plume Stability Evaluation** (file name: RO0000414_STAT_R_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.

Regards,
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

http://www.acgov.org/aceh/lop/ust.htm