



PORT OF OAKLAND

November 15, 1999

Mr. Barney Chan
Hazardous Materials Specialists
Alameda County Health Care Services Agency
Department of Environmental Health
1131 harbor bay Parkway, suite 250
Alameda, CA 94502-6577

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ENVIRONMENTAL
PROTECTION

Subject: Addendum to the September 7, 1999 Work Plan for Pacific Dry Dock Yard II, 321 Embarcadero Road, Oakland

Dear Mr. Chan:

In response to your letter dated October 18, 1999 and our conversation of October 25, 1999, we hereby amend our September 7, 1999 Work Plan for the subject site. The purpose of this revision is to respond to your request that the previously excavated soils at each of the former UST locations, which was placed back into the excavations following tank removals, be removed and disposed off-site. To accomplish this, we propose to implement the following activities:

1. Identify the former tank excavation areas using the best available maps and remaining on-site landmarks. The perimeter of the tank excavation will be marked and a backhoe will be used to remove previously back filled soil.
2. The extent of excavation will be the following: UST GF-11: 20 x 11 x 6 feet (assuming that the groundwater is encountered at 6.0 feet below ground surface); UST GF-12: 19 x 13 x 7.5 feet (assuming groundwater is encountered at a depth of 7.5 feet below ground surface). If groundwater is encountered at shallower or greater depths, the excavation depth will be adjusted accordingly. Any obvious free product on the groundwater surface will be skimmed and disposed off site.
3. The excavated soils will be placed on and under plastic until sampled and characterized for off-site disposal. The former tank excavation areas will be back-filled with clean soil from off-site vendors.

As indicated in the Work Plan, dated September 7, 1999, the Port is proposing additional site characterization through installation of three groundwater monitoring wells. Well installation activities will include collection of soil samples from the bore holes, as requested by the County. As we have previously indicated, one of the wells will be near the existing MW-1, and a second well will be located south of UST GF-11, as requested by the County.

Following receipt of soil and groundwater data obtained from the investigation outlined herein and in the previous Work Plan of September 7, 1999, the Port will review the data to assess fulfillment of the County and the RWQCB requirements for site closure. The data results will determine the ability of the Port of Oakland to request for site closure or the need to develop a Work Plan for additional site investigation/remediation activities for County review, comment, and or concurrence.

We understand from our conversations that it is acceptable to the County to remove the pipelines at the time of site demolition (we anticipate demolition in 2-3 years). However, the County is requesting that the pipelines, if they remain in place be flushed and capped. At this time the extent and terminus of the pipelines are unknown and we are, therefore, hesitant to introduce fluids into the pipelines for flushing. Instead if acceptable to the County, we propose that after the soil has been excavated and the pipes exposed, a vacuum truck hose (used for removing any floating product or groundwater in the excavations) will be applied to the ends of the pipelines to draw any fluids out. Any liquids collected will be transported off-site. Thereafter, the pipe-ends will be sealed with grout.

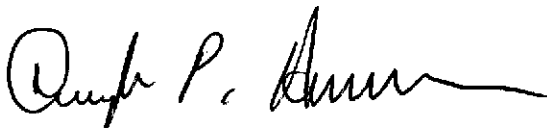
Your letter of October 18, 1999 indicates the Port may have been mistaken in its interpretation of the County's determination of the Crowley Yard II Human Health and Ecological Risk Assessment. We understand the UST releases were not part of the human health and ecological risk evaluations performed by Crowley. Our only point was that the UST investigation moves away from the former tank locations, and TRPH concentrations were identified at other locations of the yard, including higher TRPH concentrations than those identified at the UST sites. For this reason the Port proposed in the original September 7, 1999 Work Plan, not to collect soil samples away from the former UST locations. However, as the County believes that soil samples from the monitoring well locations can provide additional data for the UST sites, the Port has agreed to collect such samples in this Work Plan addendum.

We hope that this addendum to the September 7, 1999 Work Plan addresses the County's concerns and responds to your comments in the October 18, 1999 letter to the Port. If the County concurs with the Work Plan and the enclosed amendments, please advise us at your earliest convenience.

As an aside, the Port will submit under separate cover our comments on the October 5, 1999 letter from Crowley Marine Services for your review and information.

If you should have additional comments or concerns, please contact me at 510-627-1184.

Sincerely,



Douglas P. Herman
Assistant Port Environmental Scientist

cc: Michele Heffes
Joyce Washington
Jeff Jones
Yane Nordhav