

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-20-06

September 19, 2006

Mr. John Prall
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Dear Mr. Prall:

Subject: RO0000470, Berths 60-63 Redevelopment Project, 1395 Middle Harbor Rd.,
Oakland, CA 94607

Alameda County Environmental Health (ACEH) has reviewed the file for the subject site including the August 30, 2006 Revised Soil Management and Contingency Plan APL Terminal Redevelopment Project Port of Oakland, Oakland, California by ETIC Engineering. The plan provides the approach and guidance for handling impacted soil and water, which may be encountered during the reconstruction of the APL Terminal (Berths 60-63). The revised SMCP responds to technical comments in the County's 6/30/06 letter. We concur with the revised SMCP and have the following technical comments to observe when performing the development work.

TECHNICAL COMMENTS

1. Screening for Contaminants of Concern- PAHs and metals are among the COCs. PAHs at this site are found within the samples having elevated TPH, therefore, the screening methods for TPH, visual, odor and PID readings, will be appropriate to identify potential PAH impacted soils. Metals, except for an isolated area near boring B-20, are below soil reuse levels. Therefore, the B-20 area will be excavated and re-sampled and the rest of the site need not be screened for metals.
2. Sampling of any non-impacted soil not reused onsite will be done at a frequency stated in 6.4.3 of the Revised SMCP, which is consistent with the SFRWQCB draft document, November 2002, Characterization & Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste. The COCs analyzed should be determined based on historic data and site usage.
3. The proposed soil cleanup levels are based upon the following hierarchy: 1. SFRWQCB ESLs for commercial/industrial sites or for soil leaching to groundwater where groundwater is not considered potable, 2. US EPA Region 9 PRGs for commercial/industrial properties and 3. The 95% upper confidence limit of the background concentration range for metals in soil (LBNL, 1995). These concentrations are provided in the revised Table 1 in the August 30th document.
4. The removal of free product and highly impacted soil should be done to the extent possible, since this represents a potential on-going source of contamination to soil and groundwater. We understand that contamination will not be delineated at this

time, however, discretionary in-situ soil samples will be collected to document contaminants left in-place and identify the COPC present.

5. Either groundwater or runoff water will be generated during the development. Surface water that is not contaminated will be discharged to the storm drain in accordance SWRCB permit requirements. All other disposed water must have proper disposal documentation. The presence of potential organic compounds in water must be done by sampling and chemical analysis, not estimated from monitoring well data or soil data.
6. Two areas formerly under the SFRWQCB oversight have been temporarily transferred to Alameda County for oversight. The Port shall continue to observe Water Board recommendations for investigation (Berths 57-59, Former Union Pacific Motor Freight Area) and the previously existing site management plan (UP Roundhouse site). As noted, soil reuse in these areas is restricted to returning such soil to its same property boundaries.

TECHNICAL REPORT REQUEST

- Please provide your Post-Construction report within 90 days of completion of site activities.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

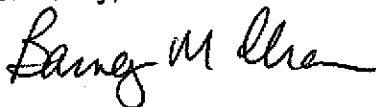
All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos, A. Levi

Ms. Roberta Reinstein, Port of Oakland, 530 Water St., P.O. Box 2064, Oakland,
CA 94607-2064

Messrs. Max Shahbazian and Roger Papler, SFRWQCB

Mr. Alan Anselmo, ETIC Engineering, 1333 Broadway, Ste. 1015, Oakland, 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

July 6, 2006

Mr. John Prall
Port of Oakland
530 Water St.
Oakland, CA 94604-2064

Dear Mr. Prall:
Subject: SLIC Case RO0000470, Port of Oakland/APL, 1395 Middle Harbor Road,
Oakland, CA 94607

Please be informed that the subject site has been taken out of the Local Oversight Program (LOP) and put into our SLIC program.

In order for ACEH to continue to review reports for your site, we will require an oversight account for the above-referenced site. To set up your account, please send a check in the amount of \$6000.00 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$166.00 per hour.

Please write "SLIC" (the type of project), the site address on your check.

If you have any questions, please contact me at (510) 567-6862.

Sincerely,


Ariu Levi
Division Chief

cc: D. Drogos, J. Jacobs, B. Chan

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
07-06-06

July 5, 2006

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Mr. John Prall
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604

Dear Mr. Prall:

Subject: RO0000470, Berths 60-63 Redevelopment Project, 1395 Middle Harbor Rd.,
Oakland, CA 94607

Alameda County Environmental Health (ACEH) has reviewed the file for the subject site including the May 17, 2006 Soil Management and Contingency (SMC) Plan APL Terminal Redevelopment Project Port of Oakland, Oakland, California by ETIC Engineering. The plan provides the approach and guidance for handling impacted soil and water, which may be encountered during the reconstruction of the APL Terminal (Berths 60-63). It is understood that this plan is not a remediation plan rather a management plan to handle expected impacted soil and groundwater. As such, residual contamination is expected to be left in place and will be dealt with after the completion of the project. We have the following technical comments.

TECHNICAL COMMENTS

1. Under the Previous Investigations section of the SMC plan seven areas of potential environmental concern are noted along with the suspected contaminants in these areas. It is noted that PAHs and metals are among the COCs. Please describe how these contaminants will be screened in the field since they are not detected visually, by odor or by a PID instrument. If these COCs are not proposed for analysis, please provide justification.
2. Sampling of any non-impacted reused soils must be done at a frequency consistent with the SFRWQCB draft document, November 2002, Characterization & Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste. The chemicals of concern, COCs, analyzed may be determined based on historic data and site usage. The proposed sampling frequency, which is in accordance with DTSC October 2001 Information Advisory, Clean Imported Fill Material, is not appropriate since using fill material from sites undergoing environmental cleanup like this, is not recommended. The sampling frequency recommended in the SFRWQCB document is the most appropriate.
3. The proposed soil cleanup levels based upon the SFRWQCB ESLs for commercial/industrial sites or for soil leaching to groundwater where groundwater is not considered potable, US EPA Region 9 PRGs and the upper end of the background concentration range for metals in soil (LBNL, 1995) are potential cleanup sources, however, there appears to be a lack of consistency for the basis of selecting those listed in Table 1. Some of the proposed reuse levels are based upon the soil leaching to groundwater ESL, some based upon background and some based upon

Mr. John Prall

July 5, 2006

Page 2 of 3

C/I Direct Exposure ESL. Please provide your justification for the specific selection of cleanup levels for all chemicals listed in Table 1. This should take into account all complete exposure pathways and selection of the lowest cleanup level. If this is not the case, please explain your discrepancy. Please provide a copy of the reference for the background metal concentrations in Table 1.

4. Unimpacted materials are proposed to be removed, stockpiled in unlined areas and/or reused onsite. Prior to reuse, the soil must be sampled and analyzed to verify it meets the proposed reuse criteria and sampling frequency should be in accordance with the referenced SFRWQCB document. Field observation alone does not appear sufficient.
5. Either groundwater or runoff water will be generated during the development. Water that is not contaminated must meet NPDES standards and must be discharged under permit or variance from the Water Board. All other disposed water must have proper disposal receipts.
6. The removal of free product and highly impacted soil should be done to the extent possible, since this represents a potential on-going source of contamination to soil and groundwater. We concur that an in-situ sample should be taken after excavation to verify the residual contaminant concentration.
7. Two areas formerly under the SFRWQCB oversight have been temporarily transferred to Alameda County for oversight. We request that you continue to observe Water Board recommendations for investigation (Berths 57-59, Former Union Pacific Motor Freight Area) and any previously existing site management plan (UP Roundhouse site).

TECHNICAL REPORT REQUEST

- Please provide your written response to the technical comments by August 5, 2006.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have

Mr. John Prall

July 5, 2006

Page 3 of 3

been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan

Hazardous Materials Specialist

cc: files, D. Drogos, A. Levi

Ms. Roberta Reinstein, Port of Oakland, 530 Water St., P.O. Box 2064, Oakland,
CA 94607-2064

Messrs. Max Shahbazian and Roger Papler, SFRWQCB

Mr. Alan Anselmo, ETIC Engineering, 1333 Broadway, Ste. 1015, Oakland, 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

June 29, 2006



SENT
06-30-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Mr. John Prall
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604

Dear Mr. Prall:

Subject: RO0000470, Berths 60-63 Redevelopment Project, 1395 Middle Harbor Rd.,
Oakland, CA 94607

Alameda County Environmental Health (ACEH) has reviewed the file for the subject site including the March 1, 2006 Well Destruction Work Plan by ETIC Engineering. As you are aware, the decommissioning of these wells is required to facilitate the redevelopment of the site. Since the development overlaps two Water Board sites as well as one overseen by the County, you have received written concurrence for Alameda County's temporary oversight of these overlapping areas. The wells proposed for decommissioning are wells MW6, MW7, MW8 and extraction well EW-5 at Berth 59, wells APL/UP-W1 and APL/UP-W2 at Berth 60, wells DSMW1-DSMW3, installed as a result of a diesel spill from a railroad car derailment and wells MW-1 through MW-3, located near former underground tanks EF6-9. It appears unclear whether all wells currently exist, however, part of your proposal should include the confirmation of any previously closed well from those listed above. The County approves the decommissioning of these wells. However, we require that you satisfy the Water Board recommendations for Berth 57-59 ie additional temporary well or boring between former boring B60 and AL/UP-W2 for groundwater sampling and confirmation of the inertness of the landfill backfill. In addition, post development groundwater sampling in the areas of these well must be considered.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: files, D. Drogos, A. Levi

Ms. Roberta Reinstein, Port of Oakland, 530 Water St., P.O. Box 2064, Oakland,
CA 94607-2064

Messrs. Max Shahbazian and Roger Papler, SFRWQCB
Mr. Alan Anselmo, ETIC Engineering, 1333 Broadway, Ste. 1015, Oakland, 94612

6_29_06 1395 Middle Harbor Rd

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

SCW JB-B-07

March 2, 2006

Mr. John Prall
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Dear Mr. Prall:

Subject: RO0000470, Berths 60-63 Redevelopment Project, 1395 Middle Harbor Rd.,
Oakland, CA 94607

Alameda County Environmental Health (ACEH) has reviewed the file for the subject site including the *January 6, 2006 Response to Comments from Alameda County Health Services* dated November 14, 2005 by ETIC Engineering. We have also considered the information presented during the February 2, 2006 meeting with ETIC and the Port at the County offices. We expect that our meeting, discussion and ultimate concurrence on relevant environmental issues will allow the proposed development to proceed without delay, while satisfying the environmental needs of our office. Because our office is concerned with both protection of human health and the environment and the administrative oversight and closure of sites, although we concur with the proposed commercial development of the site and the conclusion of the Construction Worker Risk Assessment, additional information may be required to adequately characterize the site and make a no further action determination. We believe that if additional information or investigation is warranted, this work would be done during and after development. With the noted historical uses of this and neighboring sites, it is currently unclear whether all the potential areas of concern have been adequately addressed.

We have the following observations and technical comments for the site and to the ETIC Memorandum, which we request that you address.

TECHNICAL COMMENTS

We have reviewed the information and results of previous soil and groundwater investigations to determine if this data has adequately characterized the areas of concern. We note that even though no unacceptable risk is foreseen for the construction worker and nearby neighbors during site development, numerous administrative controls must be observed to prevent future contaminant exposure. Also, as noted in the risk assessment, risk may change as additional data is obtained. Our initial concern is to identify the potential areas of concern and identify any data gaps that may be present. We offer the following technical observations for your comment and response.

1. **Municipal Debris Landfill-** We are aware that this area is currently being overseen by the RWQCB. ETIC's Memorandum states that a report is being prepared for submission to the Water Board to examine the feasibility of remediation of the free product at the site believed to be Bunker C. The Port, during our meeting, informally inquired whether the County would be willing to provide oversight of this area if the

Water Board concurred, the rationale being that the project will extend onto this site and that the County is currently providing oversight to the majority of the proposed re-development. We also understand that the Port will also be requesting the Water Board transfer oversight of a small portion of the Union Pacific Roundhouse site, which they currently oversee, also within the redevelopment footprint. We would be willing to include County oversight of these areas, however, we cannot comment on these two areas until oversight is formally transferred to the County in writing.

2. The Boring B20 Area- Located in the southeast corner of the site, this area was formerly occupied by Sherex Chemical and the El Dorado Oil Facility. The site formerly had four USTs, one gasoline, two methanol and one containing nitrile residue. There was no closure report for these tanks, nor was there any report on the closure of the plants. Figure 3 of the June 10, 2002 Iris Environmental report indicates the following potential areas of concern; fuel oil, oil tank, tanks, tank farms, solvent extraction plant, drum storage and amine reactor. Monitoring wells SMW-1 through SMW-4 and MW-1 were installed in this area. Please provide any information on the closure of the USTs, the closure of the plants, sampling data from these wells and soil and water sampling in these areas of concern. What additional data is necessary to characterize the site?
3. Investigation of former USTs EF6-9- The Geomatrix tank removal report details that significant TPHd, up to 11,000 ppm, was left in-place in soil after the removal of the diesel, gasoline and waste oil tanks. Physical constraints prevented the removal of additional soil contamination. Soil borings and three monitoring wells were installed to define the release, however, it appears that contamination migrated beneath the nearby building, E-221. Monitoring wells MW-1 through MW-3 were installed and sampled, however, they do not define the petroleum and HVOC plumes, particularly towards the west. Groundwater gradient has been variable and appears opposite of the assumed gradient ie towards the estuary. Additional groundwater definition and soil excavation should be considered when the former physical constraints are removed. In the absence of additional soil removal, replacement wells will be required.
4. Investigation of former USTs EF-11 through EF-13- The County expressed concern over the presence of TPH contamination that appeared to increase with depth. ETIC explained that this was not an uncommon result of dissolved TPH being spread in a smear zone as historical water depths vary. They also point out that groundwater has been minimally impacted. The County's concern is two-fold, whether higher concentrations or submerged product may exist and what is the thickness of the smear zone ie how much residual contamination is left in-place? In order to answer these questions, additional sampling and analysis appears necessary.
5. Diesel Spill/ Railyard Area- In this northern portion of the site, numerous areas of concern exist. A railroad diesel spill occurred in 1995 and three monitoring wells were installed. It is unclear if this release was ever resolved (closed). Please provide clarification as to what occurred, what remediation was performed, what monitoring results exist and what additional investigation is required for closure. In this area, numerous tanks are known to have been present including two fuel oil tanks, an oil tank, a sludge tank and USTs excavated in 1975. Are there any reports

on these tank removals? Do they pose any health risk? A machine shop, plating shop, wash area, boiler and compressor house and blacksmith and boiler shop are also noted in this area. Have these shops been inspected? Will they be sampled as necessary prior to demolition? The 2005 Kinder Morgan release from their pipeline occurred just northwest of this area. The release and investigation was overseen by the USEPA. The release impacted the storm drain and migrated across the entire APL site through the storm drains and impacted the Oakland estuary. Numerous wells were installed, free product recovered and storm drains washed and inspected. It is uncertain whether this release continues to present an environmental risk to the APL site. Please provide a copy of the EPA report so we are able to make this determination.

6. **Other Impacted Areas-** This area consists of the remainder of the site not previously mentioned. Iris' Historical and Present Areas of Concern, Figure 3 notes the following areas of potential concern within this area: fuel facility (excavated 1972), machine shop substation, machine shop E-207, electric shop, refuse burner, mock-up engine building, paint shop and a series of transformer substations. These areas should be inspected and possibly investigated prior to development.
7. **Preferential Pathways –** As noted, we request a copy of the EPA report of the Kinder Morgan pipeline release, which will be used to determine if the storm drains still pose an environmental risk.
8. **Co-ordination with Other Agencies-** We await written confirmation from the Water Board of oversight transfer before commenting.
9. **Risk Assessment/ Environmental Risk Assessment -** The risk assessment provided only evaluated risk to the construction worker. Multiple areas of concern exist with little to no groundwater evaluation. Therefore, the absence of this data prevents proper evaluation of groundwater impacts and their risk to the Oakland Inner Harbor. Please compile site groundwater data and determine what additional data is necessary to determine groundwater impacts and environmental risk. We agreed with the scope and approach of evaluating exceeds of ESLs, however, this is contingent on the existence of adequate data evaluating the many areas of concern.
10. **Grading Contingency Plan-** We have been requested to review and approve the GCP, which addresses how contaminated soil and groundwater will be documented and handled during the development. Although some contamination may be remediated during development, such removal of contamination will be coincidental as opposed to focused remediation and we do not consider this a remediation plan.
11. **Well Destruction Work Plan-** We understand a well destruction plan will be submitted prior to March 10, 2006. Please consider if additional monitoring is necessary from these wells prior to decommissioning. Your plan and evaluation should include all known wells at the site.
12. **Geotracker and Electronic Submission of Reports-** Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper

copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at barney.chan@acgov.org.

TECHNICAL REPORT REQUEST

Please submit the following technical reports according to the following schedule:

- March 24, 2006- Technical response to address concerns of Boring 20 Area, USTs EF6-9, USTs EF-11 through EF-13, the Diesel Spill/ Railyard Area, and the Other Impacted Areas.
- March 24, 2006- Copy of EPA Report of Kinder Morgan Pipeline Release
- March 24, 2006- Grading Contingency Plan
- March 10, 2006- Well Decommissioning Work Plan

PERJURY STATEMENT

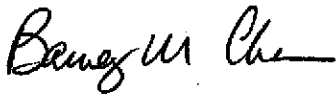
All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos, A. Levi

Ms. Roberta Reinstein, Port of Oakland, 530 Water St., P.O. Box 2064, Oakland,
CA 94607-2064

Messrs. Max Shahbazian and Roger Papler, SFRWQCB

Mr. Alan Anselmo, ETIC Engineering, 1333 Broadway, Ste. 1015, Oakland, 94612

2_24_06 1395 Middle Harbor Rd

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
11/15/05

November 14, 2005

Mr. John Prall
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94607-2064

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Dear Mr. Prall:

Subject: Berths 60-63 Redevelopment Project, Including 1395 Middle Harbor Rd., Oakland, CA 94607, RO0000470

This letter follows up ACEH's September 30, 2005 letter where the County agreed to accept the oversight of the planned Berths 60-63 Redevelopment Project. Within this area several contaminant areas were identified in addition to the underground storage tank releases from former tanks, EF6-9, EF11-13 and EF14, collectively called 1395 Middle Harbor Rd., RO0000470, by our agency. To provide consistency and coordination with the proposed site development and environmental investigation of this project, we agreed that this would be best done under one agency. It is further understood that adjacent properties have been affected by contaminants, which may have impacted the proposed development site and that other agencies may be the lead on these investigations. The County will work with these agencies, collaboratively.

Our office has received and reviewed the following reports:

- Treadwell and Rollo, 2005, Underground Storage Tank Assessment, Berth 60-63, 1395 Middle Harbor Road, Oakland California, 2 May.
- Treadwell and Rollo, 2005, Redevelopment Planning Report, Environmental Subsurface Assessment, Berths 60-63 Yard and Gate Redevelopment Project, Oakland, California, 30 March.
- ETIC and SAIC, 2005, Construction Worker Risk Assessment, Berth 60-63 Yard and Gate Redevelopment Project Area, Port of Oakland, 21 March.
- Iris Environmental, 2002, Planning Scale Environmental Site Assessment, American Presidents Lines Terminal, Port of Oakland, Oakland, California, 10 June

Please address the following technical comments when performing the proposed project.

TECHNICAL COMMENTS

1. **Well Decommissioning-** we approve of the decommissioning of wells MW1-MW3 installed for the investigation of former USTs, EF6-9.
2. **UST Area EF6-9-** This UST area will require additional investigation post-development. The lateral and vertical extent of petroleum in soil and groundwater should be investigated, particularly in the direction of building E-221, which will be

accessible after this building is demolished. Replacement wells will also be necessary to demonstrate plume stability. The significance of HVOCs detected in soil will also need investigation. Please provide a work plan for soil and groundwater investigation and replacement wells as requested below. We concur with the referenced report, ie no building should be built above this area without County concurrence.

3. **UST Area EF-11 through EF-13-** The presence of TPHd and TPHmo contamination, which increases with depth should be investigated and explained. Please provide your response in the work plan requested below.
4. **UST Area EF-14-** We concur that no further work appears necessary for this former UST.
5. **Other Impacted Areas-** The listed reports identify other impacted areas within the planned redevelopment including the Municipal Debris Fill Area to the west, the Diesel Spill/Railyard Area to the north, the B20 Area, named for the impacted boring in an area believed impacted by historic industrial use and the General Area, representing the rest of the site, which has also been impacted by historic uses. Within these areas, sample locations exceeding ESLs have been identified. These areas should be evaluated for remediation or additional investigation and any work should be performed prior to the proposed redevelopment. Areas of free product should be remediated to the extent possible. Groundwater impact should be determined and monitoring wells should be considered in significantly impacted areas. The threat of contamination to the nearby surface water should be evaluated. Provide your investigation work plan as requested below.
6. **Preferential Pathways-** Storm drains have been identified as potential preferential pathways. In addition, new utilities associated with the development may encounter impacted soils. A recent release from a Kinder Morgan pipeline is suspected of impacting a storm drain running north-south through the General Area. The threat of these releases and their impact to the estuary should be evaluated prior to redevelopment.
7. **Co-ordination with other agencies-** Please identify the nearby and neighboring sites, which may have some impact on the proposed development area and provide the name of the overseeing agency and their contact information. We will copy them with correspondences and hope they will reciprocate. Provide this information as requested below.
8. **Provide a schedule for the Re-development –** As soon as possible, please provide a schedule for the development.
9. **Geotracker EDF Submittals -** A review of the case file and the State Water Resources Control Board's (SWRCB) Geotracker website indicate that electronic copies of analytical data have not been submitted for your site. Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB

Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format).

In order to remain in regulatory compliance, please upload all LUFT analytical data (collected on or after September 1, 2001, to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please perform the electronic submittals for applicable data and submit verification to this Agency by December 15, 2005.

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

TECHNICAL REPORT REQUEST

Please submit the following technical reports according the following schedule:

- Well Decommissioning report- 30 days after completion of well decommissioning.
- Work plan for USTs EF6-9 and EF-11 through EF-13 – 60 days after completion of redevelopment of these areas.
- Work plan for Other Impacted Areas- 60 days after completion of redevelopment of site.
- Preferential Pathway evaluation/work plan- 60 days after completion of site redevelopment.
- December 15, 2005- Nearby, adjacent site data.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

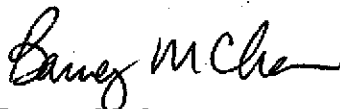
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

If you have any questions, please call me at (510) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos, A. Levi

Ms. Roberta Reinstein, Port of Oakland, 530 Water St., P.O. Box 2064, Oakland,
CA 94607-2064

Mr. Grover Buhr, Treadwell & Rollo, Inc., 501 14th St., Third Floor, Oakland, 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



3-13-03

March 12, 2003

Mr. John Prall
Port of Oakland
530 Water St.
P.O. Box 2064
Oakland, CA 94604-2064

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Dear Mr. Prall:

Subject: Fuel Leak Case RO0000470, 1395 Middle Harbor Road, Oakland CA 94607

Alameda County Environmental Health, Local Oversight Program (LOP) staff have reviewed the case files for the referenced site including the November 2002 Additional Site Characterization Work Plan for Site Closure and the February 28, 2003 Response to Comments for this work plan both prepared by ITSI, your consultant. Based upon the February 28, 2003 Response, our office approves the work plan which includes the technical comments, which follow.

Technical Comments

- In regards to the investigation for USTs EF6-9, there appears no need for additional borings north of MW-1. However, two additional borings will be advanced, one within the former tank pit, near the center of the former 10k diesel tank and one approximately 20' south of former boring AP-7.
- Total Petroleum Hydrocarbons as motor oil will be run instead of TOG and MTBE will be run by 8260 to avoid additional confirmation analysis, if warranted.
- For samples investigation EF-14, the analysis of metals will be eliminated. Our office recommended running BTEX and MTBE by EPA Method 8021. BTEX is a required analyte for diesel tank investigations, but MTBE is not required for USTs, which have only contained diesel or jet fuel. However, in the event BTEX is detected during this investigation, indicating potential gasoline use, MTBE would then be required. So the most cost effective analysis for diesel tank investigations would be BTEX and MTBE by EPA Method 8021.
- A utilities survey will be included in your future risk assessment for this site.

Please notify our office when this field work is scheduled. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos, files
Ms. R. Hess, ITSI, 2730 Shadelands Drive, Suite 100, Walnut Creek, CA 94598

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



9-11-02

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

September 10, 2002

Mr. John Prall
Port of Oakland
P.O. Box 2064
Oakland, CA 94604-2064

Dear Mr. Prall:

Subject: Fuel Leak Case RO0000470, 1395 Middle Harbor Road, Oakland, CA 94607

Alameda County Environmental Health, Local Oversight Program (LOP), has reviewed the case file for the subject site in response to your consultant's inquiry on site status and determined that additional information is needed at this site prior to site closure consideration. Please address the following technical comments and submit the technical reports as requested below.

Technical Comments

USTs EF6-EF9 (1-10k and 1-5k diesel, 1-1k gasoline and 1-550 gallon waste oil)

Observations during tank removals:

- Floating product in the diesel tank pit area at ~10', one obvious hole in 500 gallon waste oil tank. Considerable TPHd left in place, APL7@5.8-11,000 ppm, APL2-1 @5.5'-5,000 ppm, APL2@4.2'-2100 ppm
- Failed to analyze soil samples for SVOCs for waste oil tank and MTBE for all tanks
- Grab groundwater sample analyzed for only VOCs not TPHg, d, mo, metals, semi volatiles and MTBE.

Observations after soil borings and MW installed

- Did not run soil sample from B-9 because of elevated PID readings
- Plume not defined in north, east or west directions
- No gw samples analyzed from any of the borings
- No MW down gradient/within 10' of tank pit to monitor highest impacted area & to estimate impact to building occupants
- Chlorinated compounds detected in gw
- Gradient is flat and variable but is likely sw towards inner harbor
- TDS is well > than 3000 ppm, therefore, gw is not potable

Site Management Plan

- Utilities stated as not located in vicinity of former tank excavation. Need to provide a utilities map and receptor survey including nearby wells and other conduits.
- Do we need to look at borings to verify that bay mud is continuous?
- They need a formal ecological and human health risk assessment where Water Board RBSLs or other appropriate cleanup levels are evaluated against site concentrations. If residential use is possible, it must also be evaluated. The risk associated with TPH was not evaluated.

Mr. John Prall
1395 Middle Harbor Road, Oakland, CA 94607
RO0000470
September 10, 2002
Page 2

USTs EF11-EF14

Observations during tank removals

- EF14, 10k diesel UST, obvious holes in tanks and water in excavation, fuel dispensed from hose and reel pit 67' west of tank. Diesel not analyzed on water sample from pit.
- Were any of the soil samples from native or were they all sand (fill)?
- Need native soil samples and gw analysis for all required analytes including MTBE, other oxygenates and lead scavengers
- GW sample GW6/GW7 contained 5.8 mg/l diesel and 9, 8 ppb toluene and xylenes.

Concerns: soil samples not taken from native since concrete slab encountered beneath tanks. Probably can define extent of contamination using temporary borings.

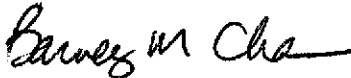
Technical Report Request

Please submit the following technical reports to our office according to the following schedule:

- October 10, 2002- Written response to this letter
- November 12, 2002- Work plan to complete site investigation

Please contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. R. Hess, ITSI, Inc., 2730 Shadelands Drive, Ste. 100, Walnut Creek, CA 94598

Req1395MiddleHarborRd

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



✓ R0470

R0720

R02885

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

StId 2485/lop
February 4, 1997

Changed StID

Mr. John Prall
Port of Oakland
PO Box 2064
Oakland CA 94604-2064

Re: American President Lines, 1395 Middle Harbor Rd., Oakland CA 94607
(USTs No. EF-06, EF-07, EF-08, EF-09, EF-11, EF-12, EF-13, EF-14)

Dear Mr. Prall:

The purpose of this letter is to inform you that this office is transferring all site information and site management hours in regard to the investigations for the referenced underground storage tanks (USTs) from Site Identification No. 3777 (1579 Middle Harbor Rd.) to Site Identification No. 2485 (1395 Middle Harbor Rd.). Per my telephone conversation with you on February 3, 1997, all underground storage tanks (USTs) listed above are located at 1395 Middle Harbor Rd. and *not* 1579 Middle Harbor Rd.. In addition, you indicated that 1579 Middle Harbor Road is the location of the guard house/back gate to 1395 Middle Harbor Road and there are no USTs associated with that address.

Although this office issued a Remedial Action Completion Certificate (RACC) for UST #EF-10 on May 7, 1996 for Site Identification No. 2485 (1395 Middle Harbor Rd.), this site will be reopened until a RACC is issued for USTs No. EF-06, EF-07, EF-08, EF-09, EF-11, EF-12, EF-13, EF-14.

If you have questions concerning this matter, please call me at (510)567-6755 if you have questions.

Sincerely,

Amy Leech
Hazardous Materials Specialist

c: American President Lines, 1395 Middle Harbor Rd., Oakland CA 94607
Lori Casias, SWRCB
Kevin Graves, RWQCB
Connie Matys
ALL-file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



STID ?
✓ R0470

UA
R02720

STID 2485
R02885

StId 3777/lop
January 31, 1997

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Mr. John Prall
Port of Oakland
PO Box 2064
Oakland CA 94604-2064

Subject: American President Lines, 1395 Middle Harbor Rd., Oakland CA 94607

Dear Mr. Prall:

Thank you for your letter dated January 2, 1997, regarding the above described site. As you know, this office has recently reviewed the case file for this property to determine if sufficient soil and groundwater investigations and remedial actions have been completed in respect to the leaky underground storage tanks (EF-6, EF-7, EF-8, and EF-9) that were removed in 1992.

Subsequent to tank removal activities, halogenated volatile organic hydrocarbons (HVOCs) were detected in groundwater from the tank pit. Most notably, 300 ppb vinyl chloride, among other HVOCs, were detected in groundwater after the the tank pit had been pumped and allowed to recharge. Three groundwater monitoring wells were emplaced around the tank pit; MW-2 and MW-3 are located ~ 60 feet to the south and MW-1 is located ~ 60 feet to the north of the tank pit. Over a three year period of sampling (1993-1995), low levels (<2.0 ppb) of vinyl chloride have been detected in monitoring MW-1. In addition, low levels (<3.0 ppb) of DCA, DCE, and DCB have been detected in one or all of the wells.

It appears that groundwater at this site is not a viable drinking water source, and therefore, groundwater quality need not meet drinking water standards at this site in order to qualify for closure status. However, the potential for a health and safety risk from exposure to chemicals of concern left in place at this site must be evaluated, eliminated, and/or reduced as a prerequisite to closure status.

Please submit to this office a map of this site that includes a description of the land-use in the area of concern (e.g. parking lot, container storage, etc.). An evaluation should also be included with the map that identifies any potential human or ecological receptors that may be exposed to residual contamination left in groundwater at this site. Exposure via direct contact and/or inhalation of vapors should be considered when identifying a potential receptor. Finally, a site management plan must be developed and submitted to this office. The site management plan should describe how the risk of the identified exposures will be evaluated, eliminated, and/or reduced.

Thank you for your assistance with this matter. Please call me at (510)567-6755 if you have questions.

Sincerely,

Amy Leech
Hazardous Materials Specialist

c: ALL-file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02885
✓ R02720
R0470

RAFAT A. SHAHID, Assistant Agency Director

April 29, 1993

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Mr. Dan McBride
Eagle Marine Services
American President Lines
1395 Middle Harbor Road
Oakland CA 94607

RE: February 16, 1993 Transformer Oil Spill at the loading
docks of American President Lines

Dear Mr. McBride:

Please find enclosed a billing statement for services provided by our Emergency Response Unit during the initial stages of the PCB oil spill, at 1395 Middle Harbor Road, Oakland, Ca 94607. As you are aware our Unit provided onsite technical assistance for proper handling of the spilled oil.

In order to recover costs, County Ordinance, Section 3-141.6, authorizes the Department to bill responsible parties for reimbursement of expenses incurred at their site for special services.

Please remit the total charge of \$420.00 as listed on the billing statement. If you have any questions concerning this matter, do not hesitate to contact me at (510) 271-4320.

Sincerely,

Kevin Tinsley
Hazardous Materials Specialist

c, Ariu Levi, Supervising Hazardous Materials Specialist
Don Hwang, Hazardous Materials Specialist
Jim Trolan, Alameda County Finance Officer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02885 (LOP)
✓R0470 (SLIC)
R02720 (SLIC)

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Feb. 19, 1993

Daniel McBride, Manager Safety & Labor Relations
Eagle Marine Services, Ltd.
1395 Middle Harbor Rd.
Oakland, Ca. 94607

Re: Polychlorinated biphenyls (PCB) released at Eagle Marine
Services, Ltd., 1395 Middle Harbor Rd., Oakland, Ca. 94607

Dear Mr. McBride:

On February 16, 1993, polychlorinated biphenyls (PCB) was
released from a transformer at the above location. Laboratory
analyses confirmed that the transformer oil was PCB.

You are required to provide this Agency with the following items:

- 1) A written report of the incident.
- 2) A work plan to determine the extent of the contamination and
for the cleanup and disposal of contaminated materials. For
guidance, you may use the enclosed document, "Appendix A,
Workplan for Initial Subsurface Investigation, August 20, 1991".
- 3) Check for \$750 to "County of Alameda", for Agency cost to
oversee this project (Alameda Co. Ord. Code, Sec. 3-140-5).
Time spent will be debited against this deposit at a rate of
\$75.00 per hour. Any funds remaining will be refunded to you
after this case has been closed.

Sincerely,

Don Hwang
Hazardous Materials Specialist

Enc.

1395mi

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R02885 (LOP)
R02720 (SUC)

✓ R0470 (SUC)
~~R0156~~

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

November 13, 1992

STID 3777 2485

Port of Oakland
530 Water St.
Oakland CA 94607
Attn: Neil Werner

RE: American President Lines Terminal
1395 Middle Harbor Rd.
Oakland CA 94607

Dear Mr. Werner,

We have received the "Work Plan for the Site Investigation" for the above referenced site, prepared by Geomatrix Consultants, dated October 1992. This workplan is acceptable, and may be implemented with the following modifications:

1. Section 3.1--standard method 5520 E & F should be utilized for Total Oil & Grease (instead of TPH as oil by EPA Method 8015) for soil samples
2. Section 3.1--EPA Method 8270 should be included for soil samples taken from the boring closest to the former waste oil tank in the downgradient direction
3. Section 3.3--standard method 5520 C & F should be utilized for Total Oil & Grease (instead of TPH as oil) for water samples

Be advised that soil cuttings and purged groundwater must be properly characterized and disposed accordingly. Hazardous wastes may not be stored onsite for more than 90 days without a storage permit.

If you have any questions, please contact me at 510-271-4530.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Elizabeth Wells, Geomatrix Consultants, Inc., 100 Pine St.,
10th Floor, San Francisco CA 94111
Rich Hiatt, RWQCB
Ed Howell/File

je