

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Wednesday, June 04, 2014 4:39 PM  
**To:** jprall@portoakland.com  
**Cc:** Yane Nordhav (yane@baseline-env.com); Roe, Dilan, Env. Health  
**Subject:** ACEH SCP Case File RO470, Port of Oakland / APL / Berths 60-63, 1395 Middle Harbor Road, Oakland

Dear Mr. Prall,

Thank you for providing the documents Alameda County Environmental Health (ACEH) requested at our meeting held on May 21, 2014. ACEH has reviewed the recently submitted documents entitled *Post Construction Closure Report (PCCR)*, dated August 13, 2013, and the *Underground Storage Tank Closure Request (RFC)*, dated June 13, 2013, prepared by Baseline Environmental Consulting (Baseline) for the subject site. The PCCR identified four areas of concern and proposed characterization activities for these areas. The RFC requested closure of two underground storage tank (UST) sites located on the property. As discussed in our meeting of May 21, 2014, ACEH considers it premature to close the UST portion of the case as the closure process would require significant administrative effort and the site would still remain open as a Site Cleanup Program (SCP) case.

Based on our review of the PCCR, please address the following technical comments and provide ACEH a work plan addendum as requested below.

### Technical Comments

The PCCR reviewed seventeen potential areas of concern and identified four areas, referred to as Cases, warranting further investigation. These cases are addressed below.

- Case 002

Proposed Action: Advance four soil borings for the collection of soil samples at depths of 2 feet and 5 feet below the ground surface (bgs), and at the ground water interface. One of the borings, located in the down gradient direction, would be converted into a temporary well for the recovery of a groundwater sample.

ACEH Response: Four soil borings are adequate for an initial characterization of Case 002 and the scope of analysis is appropriate for the investigation. However, the groundwater flow at the site has been described as “very flat” in groundwater monitoring events conducted prior to well abandonment for site redevelopment. Please recover groundwater samples from each of the four borings for laboratory analysis.

- Case 004

Proposed Action: Advance one soil boring for the collection of soil samples at depths of 2 feet and 5 feet bgs, and at the ground water interface. The boring would be converted into a temporary well for the recovery of a grab groundwater sample.

ACEH Response: Although the scope of analysis is appropriate for the investigation, ACEH is concerned that one soil boring may not be adequate to characterize this area. Please advance a minimum of three soil borings for an initial characterization of Case 004. Please recover soil and groundwater samples from each of the three borings in the manner prescribed in the PCCR for laboratory analyses.

- Case 009

Proposed Action: Advance one soil boring for the collection of soil samples at depths of 2 feet and 5 feet bgs, and at the ground water interface. The boring would be converted into a temporary well for the recovery of a grab groundwater sample.

ACEH Response: Although the scope of analysis is appropriate for the investigation, ACEH is concerned that one soil boring may not be adequate to characterize this area. Please advance a minimum of three soil borings for an initial characterization of Case 009. Please recover soil and groundwater samples from each of the three borings in the manner prescribed in the PCCR for laboratory analyses.

- Other Area- Oil/water by Building E-221

Proposed Action: Install three groundwater monitoring wells in area of former USTs designated EF-6 through EF-9. Soil samples are proposed to be recovered at depths of 5-feet and 10-feet bgs (or above the groundwater interface) and, if shallow groundwater is encountered below 10 feet, an additional soil sample will be collected at the groundwater interface.

ACEH Response: ACEH notes that the oil/water sample was collected at a depth of 4 feet bgs. ACEH requests that soil samples be collected at depths of 4 feet bgs and in the interval of 5- to 10 feet bgs (or above the groundwater interface) and, if shallow groundwater is encountered below 10 feet, an additional soil sample should be collected at the groundwater interface. Please develop the wells a minimum of three days after well installation and allow two additional days prior to well sampling. The wells should be surveyed using the North American Vertical Datum of 1988 (NAVD 88).

Based on ACEH's review of the PCCR document, ACEH additionally recommends the following areas also be considered for investigation:

- Case 005

The laboratory analysis report appears inconsistent with the photograph of the trench water at this location, which shows at least a film of free phase product on the water. Please advance four soil borings in the vicinity of Case 005 for an initial characterization of this area. Collect soil samples at depths of 2 feet and 5 feet bgs, and at the ground water interface. Additionally convert the borings to temporary wells for the recovery of groundwater samples. The scope of analysis for both the soil and groundwater samples should include total petroleum hydrocarbons (TPH) as gasoline (TPHg), diesel (TPHd), motor oil (TPHmo), volatile organic compounds (VOCs) by EPA test method 8260B and semi-volatile organic compounds (SVOCs) by EPA test method 8270.

Alternatively, provide justification to support investigation of Case 005 is not warranted.

- Case 010

Soil sample P1A-010 was reported to contain 150 milligrams per kilogram (mg/kg) TPHd and 1,000 mg/kg TPHmo, 460 mg/kg naphthalene, and carcinogenic PAHs having a sum of 29.88 benzo(a)pyrene toxicity equivalent. ACEH is of the opinion this area is not adequately characterized. Please advance four soil borings in the vicinity of Case 010 for an initial characterization of this area. Collect soil samples at depths of 2 feet and 5 feet bgs, and at the ground water interface. Additionally convert the borings to temporary wells for the recovery of a groundwater samples. The scope of analysis for both the soil and groundwater samples should include TPHg, TPHd, TPHmo, VOCs by EPA test method 8260B and SVOCs by EPA test method 8270.

Alternatively, provide justification to support investigation of Case 010 is not warranted.

- Case 011

It is unclear to ACEH that analysis of soil and groundwater was performed in the vicinity of the oil water separator or if Case 012 and 013 are part of the oil/water separator investigation. Please elaborate on the investigation in this area and whether or not it appears complete. If incomplete, propose a soil and groundwater investigation to characterize the area in the work plan addendum requested below.

- Additionally, please provide the location of boring B97 on a figure of the work plan addendum. Alternatively, please redevelop and sample extraction well EW5.

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:

- **July 19, 2014– Work Plan Addendum** (file name: RO0000470\_WP\_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](mailto: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>