



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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December 10, 2015

Mr. John Prall  
Port of Oakland  
530 Water Street  
Oakland, CA 94607  
(Sent via Email to [jprall@portoakland.com](mailto:jprall@portoakland.com))

Subject: Report Review and Work Plan Request for Site Cleanup Program Case No. RO0000470 and GeoTracker Global ID T0600101969, Port of Oakland/ APL/ Berths 60-63, 1395 Middle Harbor Road, Oakland, CA 94612

Dear Mr. Prall:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject fuel leak case including the document entitled, *Post-Construction Field Investigation Report*, dated August 7, 2015, and prepared by Amec Foster Wheeler Environment and Infrastructure, Inc. (AMEC) for the subject site.

The referenced report documented the investigation of five areas of potential environmental concern-designated Case 002, Case 004, Case 005, Case 009, and Case 010- in order to delineate residual contamination identified in previous investigations. Additionally, three groundwater monitoring wells were installed around the former location of underground storage tanks (USTs) EF-6, EF-7, EF-8, and EF-9, located to the east of (former) Building E-221, to replace wells destroyed for site redevelopment.

ACEH agrees the AMEC evaluation that soil concentrations of potential chemicals of concern (PCOCs) identified for this case should be evaluated for ESLs under a Commercial/Industrial land use scenario.

AMEC evaluated the suitability of groundwater beneath the site as a municipal or domestic water supply (MUN) based on the criteria in the July 21, 2013 San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan) issued by the San Francisco Bay Region Regional Water Quality Control Board (SFBR-RWQCB). Based on total dissolved solid (TDS) concentrations exceeding 3,000 milligrams per liter (mg/L) (5,000 microSiemens per centimeter,  $\mu\text{S}/\text{cm}$ , electrical conductivity), AMEC found that water quality beneath all but one of the areas investigated did not meet MUN water quality requirements and that groundwater at the site is not currently a potential drinking water resource. Therefore, AMEC proposed and evaluated the site using SFBR-RWQCB Environmental Screening Levels (ESLs) where groundwater is not a current or potential drinking water resource.

ACEH notes that, after a preliminary review of the data, there may be a bimodal distribution of the TDS concentrations. The rationale for the TDS concentration delineation has not been adequately explained. Additionally, one of three groundwater monitoring wells recently installed at the site contains TDS levels below the 5,000  $\mu\text{S}/\text{cm}$  threshold concentration. ACEH considers the TDS data from the monitoring wells a more accurate representation of groundwater conditions. Therefore, the evaluation that groundwater as a potential drinking water source may be re-evaluated as additional data becomes available.

ACEH is in general agreement with the conclusions of the report which determined all six areas of investigation require further investigation to delineate vertical and horizontal extent of contamination.

Therefore, ACEH requests that you prepare a work plan that addresses the Technical Comments provided below.

## **TECHNICAL COMMENTS**

### **1. CASE 002**

- A. SOIL** – Two of the four soil bores advanced in this area were reported to contain several VOCs exceeding ESLs listed in Summary Table B- Shallow Soil where Groundwater is not a Current or Potential Drinking Water Resource. The two soil bores, APLB-3 and APLB-4, are located to the south and southwest, respectively, of the location of the previously advanced soil bore P1A-007-E5. The volatile organic compound (VOC) concentrations in soil collected from the northern and eastern soil bores, APLB-1 and APLB-2, respectively, were reported below their respective ESLs. Additionally, the laboratory reporting limits for semi-volatile organic compound (SVOC) fluorene were higher than its ESL for soil samples collected from soil bore APLB-3.

ACEH considers the soil contamination in this area to be undefined.

- B. GROUNDWATER** – All four grab groundwater samples collected from this area contained at least one VOC compound at a concentration exceeding ESLs (Summary Table B- Groundwater is not a Current or Potential Drinking Water Source).

ACEH considers the groundwater contamination in this area to be undefined.

### **2. CASE 004**

- A. SOIL** – The two of the three soil bores advanced at this location, soil bores APLB-5 and APLB-6, located to the north and west, respectively, of the location of the previously advanced soil bore P1A-004-N4, contained total petroleum hydrocarbons as diesel (TPHd) concentrations exceeding ESLs in Table B. With the exception of toluene at a concentration of 0.0047 milligrams per kilogram (mg/kg) in soil sample APLB-5(2.5), VOC and SVOC concentrations were reported below the laboratory reporting limits for the soil samples recovered from this area.

ACEH considers the TPH soil contamination in this area to be undefined.

- B. GROUNDWATER** – Grab groundwater samples from APLB-5 and APLB-6 were reported to contain TPHd and TPHmo concentrations exceeding their respective ESL on Table B. The third soil bore, APLB-7, did not produce an adequate quantity of water for the TPHd, TPHmo and SVOC analyses, hence groundwater in the direction of APLB-7 remains undefined. VOC analysis of water samples from APLB-5, APLB-6, and APLB-7 did not find concentrations exceeding appropriate ESLs, and water samples from APLB-5 and APLB-6 were reported to contain SVOCs at concentrations below the laboratory reporting limit.

ACEH considers the groundwater contamination in this area to be undefined.

### **3. CASE 005**

- A. SOIL** – Soil samples recovered from two of the four borings (APLB-8 and APLB-11) in this location were reported to contain TPHd and TPHmo concentrations exceeding their respective ESLs. Additionally, concentrations of the SVOCs fluorene and phenanthrene were reported above their respective ESLs on Table B in soil bore APLB-8. Concentrations of VOCs and SVOCs were reported below their respective ESLs in borings APLB-9, APLB-10, and APLB-11.

ACEH considers soil contamination in this area to be undefined.

- B. GROUNDWATER** – The grab groundwater sample recovered from the northern soil bore, APLB-8, was reported to contain TPHd and TPHmo at concentrations exceeding their respective ESLs. The remaining three water samples were reported to contain TPHd and TPHmo at concentrations below their respective ESL. Low concentrations of methyl tertiary butyl ether (MTBE) were reported in samples from APLB-8 and APLB-11. Concentrations of other VOCs and SVOCs were reported at or below the laboratory reporting limit.

ACEH considers the groundwater contamination for this area undefined.

#### 4. CASE 009

- A. SOIL** – All five borings advanced in this location contained at least one PCOC at a concentration exceeding the ESL. The PCOCs include TPHd, TPHmo, lead and zinc. Arsenic may not be a PCOC as the reported concentrations, though exceeding its ESL, may be within background concentrations for soil in this region. Additional analysis may be appropriate within the regional context for arsenic.

ACEH considers soil contamination in this area to be undefined.

- B. GROUNDWATER** – Grab groundwater samples for four of the five samples were reported to contain TPHd and TPHmo at concentrations exceeding their respective ESL. The fifth sample, collected from the eastern-most boring APLB-21, contained a reported concentration of barium exceeding the barium ESL. Elevated barium concentrations were reported in four of the five water samples. The source of the barium is unknown. Selenium was reported at a concentration exceeding its ESL in boring APLB-13. The selenium laboratory reporting limit for the remaining four water samples was higher than the ESL, therefore the distribution of selenium ESL exceedances could not be evaluated.

ACEH considers the extent of groundwater contamination for this area to be undefined.

#### 5. CASE 010

- A. SOIL** – Two of five borings advanced in this location were reported to contain TPHd and TPHmo concentrations exceeding their respective ESLs. The two soil bores are APLB-19- the northwestern bore- and APLB-15- the northern bore.

ACEH considers the TPH soil contamination in this area to be undefined.

- B. GROUNDWATER** – Grab groundwater samples for all five bores were reported to contain TPHd, TPHmo, and/or TPHg at concentrations exceeding their respective ESL. Additionally, chlorobenzene was reported at a concentration exceeding its ESL in the sample collected from bore APLB-19, with other VOC concentrations reported below their respective laboratory reporting limits. Concentrations of SVOCs were reported below their respective laboratory reporting limits for samples collected from APLB-16, APLB-17, APLB-18 and APLB-19, and reported below their respective ESLs in boring APLB-15.

ACEH considers the groundwater contamination in this area to be undefined at this location.

## 6. **BUILDING E-221**

- A. SOIL** – Soil samples recovered from each of the three soil bore locations were reported to contain TPHd and/or TPHmo concentrations exceeding their respective ESLs. Several SVOCs were reported for soil from APLMW-2 and APLMW-3 at concentrations exceeding their respective ESLs. Additionally, SVOC concentrations reported in soil from APLMW-3 exceed the Table 1 concentration for benzo(a)pyrene toxicity equivalent (BaPe) presented in the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) Media Specific Criteria for Direct Contact and Outdoor Air Exposure.

ACEH considers the TPH and SVOC contamination to be undefined at this location.

- B. GROUNDWATER** – Groundwater sampled from the two southern monitoring wells were reported to contain TPHd and TPHmo at concentrations exceeding their respective ESL. The reported low concentrations of SVOCs indicate these compounds are not present at levels requiring further investigation.

ACEH considers the TPH groundwater contaminant plume to be undefined in this area.

- C. UNDERGROUND FUEL STORAGE TANKS** – ACEH requests that future data presentation using Figure 8 also depict the locations of the USTs.

Please prepare a work plan to delineate the areas of contamination addressing the Technical Comments above. Submit the work plan by the date specified below.

### **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:

- **February 8, 2016** – Work Plan (File to be named: WP\_YYYY-mm-dd)

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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)

Sincerely,

Keith Nowell, P.G., C.HG.  
Hazardous Materials Specialist

Mr. Prall  
RO0000470  
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Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &  
ACEH Electronic Report Upload (ftp) Instructions

cc: David Nanstad, Amec Foster Wheeler Environment and Infrastructure, Inc., 180 Grand Avenue, Suite  
1100, Oakland, CA 94612 (Sent via E-mail to: [david.nanstad@amec.com](mailto:david.nanstad@amec.com))

Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Keith Nowell, ACEH (Sent via E-mail to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org))

GeoTracker, file

## Attachment 1

### Responsible Party(ies) Legal Requirements / Obligations

#### REPORT REQUESTS

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.

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies 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 all 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, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### 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.

#### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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.

## REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

## Submission Instructions

- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.