

February 28, 2003

Alameda County

MAR 10 2003

Barney M. Chan
Hazardous Materials Specialist
Environmental Health Services Environmental Protection
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California, 94502-6577

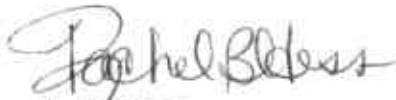
Environmental Health

Response to Comments for
Additional Limited Site Characterization Work Plan for Site Closure for Former USTs
Alameda County Fuel Leak Case RO0000470, 1395 Middle Harbor Road, Oakland, California

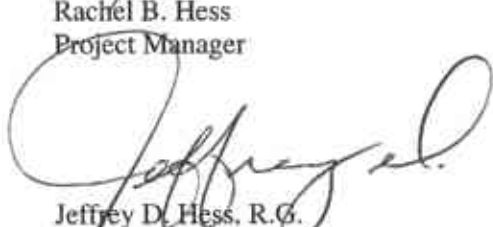
Dear Mr. Chan:

This letter is in response to your February 6, 2003 comments to the above referenced work plan prepared by Innovative Technical Solutions, Inc. (ITSI) on behalf of the Port of Oakland's Environmental Health and Safety Compliance (EH&SC) Department. During our February 10th discussion of your comments, you indicated that as long as your comments were implemented and ITSI issued a letter with the signature and stamp of our project Registered Geologist (R.G.) attesting to the work plan's contents, no re-submittal of the work plan would be necessary. This letter acknowledges that your comments will be implemented (see attached Response to Comments) and provides the approval of the project's R.G., with the following clarification: 1) identification of the former UST locations are based solely on previous investigations' maps; and 2) ITSI makes no guarantee of precisely locating the former UST locations if Port buildings or other surface features identified in the previous investigation maps are no longer present due to recent site improvements. If you have any questions or comments, please contact me at either 510-715-7842 or 925-946-3105.

Sincerely,



Rachel B. Hess
Project Manager



Jeffrey D. Hess, R.G.
Senior Geologist

CC: J. Prall, EH&SC, Port of Oakland



Alameda County Comment 1. Please have one of your registered professional sign, stamp and attest the contents of this report. I think that J. Prall might not want to use his registration for your work plan.

Response to Comment 1: A letter attesting to the contents of the work plan and, signed and stamped by an ITSI Registered Geologist will be provided.

Alameda County Comment 2. Looking at the proposed boring locations for USTs EF6-9 it appears that there is no need for the borings north of MW-1. However, I would like two additional borings. One within the former tank pit, near the center of the former 10k diesel tank, to estimate the residual soil and gw concentration and one additional boring just south (~20') of former sample APL-7, the highest residual location.

I don't have any problems with the proposed borings, # and locations, for the other UST locations. I'd request that at least one soil sample be taken from each borehole, in an attempt to determine the limits of the release.

Response to Comment 2: The figure has been revised as recommended and is attached. One soil sample will be collected from each borehole drilled.

Alameda County Comment 3. Please run total petroleum hydrocarbons as motor oil instead of TOG by method 5520. Also, it is best to run MTBE by 8260 since if it is detected by 8021, it will need to be confirmed by GC/MS.

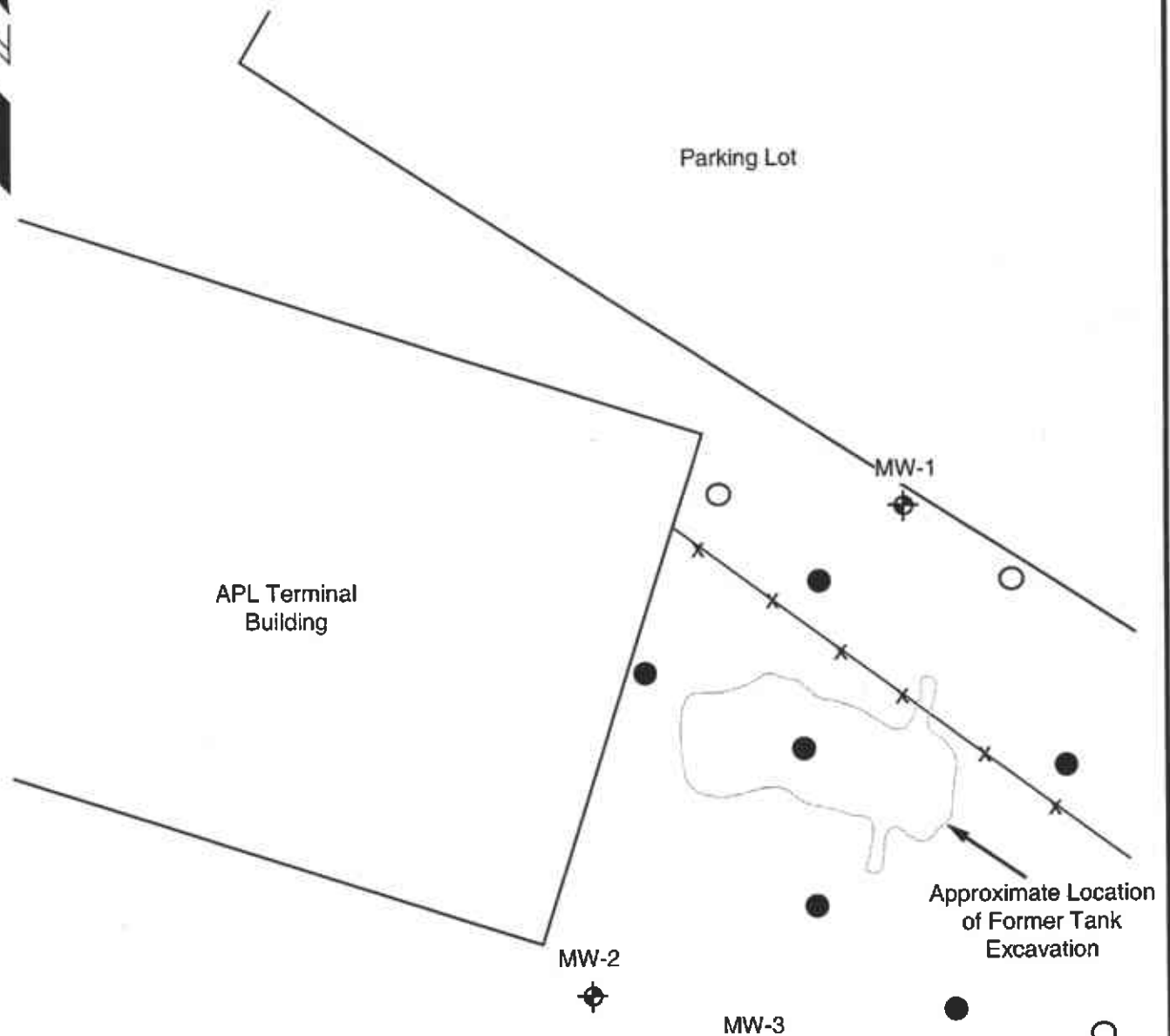
Response to Comment 3: The analyses will be changed as requested.




Alameda County Comment 4. For the samples investigating EF-14, please add the analytes BTEX. You may eliminate the analysis of metals. Note it might be easier to run BTEX and MTBE by 8021 to eliminate the need to run MTBE later if ^{no} significant BTEX is found initially.

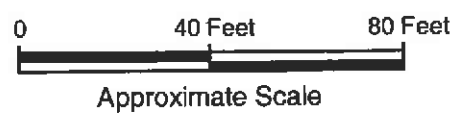
Response to Comment 4: The analyses will be changed as requested.

Alameda County Comment 5. As requested in my 9/10/02 letter, the location and depths of utilities should be provided in a site map and a risk assessment (Tier 1 or 2) should be provided after this investigation, presumably justifying closure.

Response to Comment 5: The comment is acknowledged.



- Legend**
-  Monitoring Well
 -  Proposed ITSI Boring Location
 -  Proposed Step-out Boring Location



Source: Adapted from Figure 3, Concentrations of Petroleum Hydrocarbons in Groundwater, September 25, 1995, Alisto Engineering Group.



1395 Middle Harbor Road
Oakland, California

Port of Oakland

Figure 3
Proposed Boring Locations
for EF6 through EF9