

DEPARTMENT OF HEALTH SERVICES

2151 BERKELEY WAY
BERKELEY, CA 94704

File
Port of Oakland
Embarcadero Cove

March 24, 1988

CERTIFIED MAIL

Mr. Charles Roberts
Port of Oakland
P.O. Box 2064
Oakland, CA 94604

Dear Mr. Roberts:

EMBARCADERO COVE - REVISIONS TO THE PROPOSED PHASE II
REMEDIAL INVESTIGATION WORKPLAN AND PROJECT STATUS

Thank you for submittal of the changes to the proposed remedial investigation (RI) workplan, the outline for the proposed community relations plan (CRP), the monthly reports, and the historical information obtained by the Port.

Our comments on the CRP will be provided to you within a few weeks.

After the following comments are addressed through appropriate changes in the workplan, the revised RI workplan will be considered acceptable for implementation:

1. Dioxin/Furan Analyses.

a. The laboratory to run the analyses must be experienced in dioxin/furan analyses (EPA method 8280) and must conduct all required QA/QC measures, including running required spikes and standards. In addition, at least one duplicate analysis should be run.

b. The locations proposed in Steve Nelson's March 15 letter for dioxin/furan sampling should be modified as follows:

o Omit location W21, which is off-site and is not expected to contain pentachlorophenol (PCP) or dioxins/furans.

o Omit W22 and B27 and substitute other locations in areas which are more likely to contain dioxins and furans.

- o Add location B24. This boring is located near the railroad spur. It appears from historical photos that there was spillage in this area.
- o Add W20. This is in a former tank farm area and near W9, which contained high levels of PCP.
- o Add W19. This is near B10, which contained 1600 ppm of PCP at a depth of 4-5'.

These changes still result in a good areal sampling distribution, and most of the samples will be taken in areas previously identified as being contaminated with PCP.

2. Proposed Schedule (Table 6-1).

a. The text of the workplan proposes sampling of groundwater monitoring wells every two months for the first six months. Please add these sampling dates to Table 6-1.

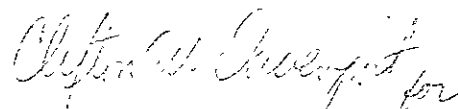
b. As required by Section V.D of the Remedial Action Order, submittal of reports which have been revised in response to comments provided by the Department are required within thirty days of receipt of the Department's comments. Table 6-1 should be revised to reflect this fact.

c. To make the schedule easier to interpret, please revise and resubmit the schedule using monthly dates, rather than quarterly dates, on the horizontal axis of the table. The revisions should reflect the actual start work date for field activities.

Please submit the required changes and begin implementation of the project within 10 working days from receipt of this letter.

If you have any questions or comments, please contact Denise Kato at (415)540-3413.

Sincerely,



Howard K. Hatayama, Chief
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

Mr. Charles Roberts

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cc: Neil Werner, The Port
Bill Van den Berg, The Port
Greg Tomlin, The Port
Stephen Krchma, Monsanto
Rafat Shahid, Alameda County Health Dept.
Lt. Mike Moore, USCG
Robert Ekedahl, Sonoma Pacific

HKH:dk:dk

ERM-West

Suite 260 • 1777 Botelho Drive • Walnut Creek, California 94596-5042 • (415) 946-0455 • Fax 415-946-9968

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Howard K. Hatayama
Toxic Substances Control Division
California Department of Health Services
2151 Berkeley Way, Annex 7
Berkeley, CA 94704

Attention: Denise Kato

Dear Mr. Hatayama:

Enclosed is a summary of additional changes and modifications to the proposed Phase II Remedial Investigation (RI) Workplan for the Embarcadero Cove State Superfund site in Oakland. These comments address items discussed in your letter of March 24, 1988 to Mr. Charles Roberts of the Port of Oakland. Some recommendations in the letter were modified during a telephone conversation April 8, 1988 between Ms. Denise Kato of the Department of Health Services and Mr. Stephen J. Nelson of ERM-West.

The laboratory selected to run the dioxin and furan analyses is California Analytical Laboratories, Inc. of West Sacramento, California. This laboratory is experienced in dioxin/furan analyses (EPA method 8280). They will conduct all required QA/QC measures, including spikes and standards. At least one duplicate analysis will be run.

Six soil samples from different borings will be analyzed for dioxins and furans. The selection of the six samples for analysis will be based upon the results of the soil sample pentachlorophenol (PCP) analyses. Samples with high PCP will be candidates for the dioxin/furan analysis since the dioxins and furans at the site occur as an impurity of PCP. The

sample selection will be coordinated with the Department of Health Services. Table 2-1 (attached) has been revised to reflect this change.

Several improvements have been made to the workplan schedule (Table 6-1). Monthly dates are used to make the table more readable. It is now based on a project implementation date of April 18, 1988 with field work scheduled to begin one month later. Sampling dates for the groundwater monitoring wells have been added. Finally, the time interval for resubmittal of reports in response to the Department's comments has been shortened to thirty days.

In order to help meet this timetable, it is recommended a meeting between the Department, the Port and ERM-West be held midway through each of the Department's review and approval periods. Such meetings should expedite the entire project as they would allow some concerns to be addressed earlier and work would be of a more continuous nature.

We look forward to continuing to work with you on this important project. If you have questions please contact me or Stephen Nelson.

Yours truly,

ERM-WEST



Richard R. Knapp
Project Geologist

Attachments

cc: Denise Kato, DOHS
Neil Werner, The Port
Bill Van den Berg, The Port
Gregory Tomlin, The Port
Stephen Krchma, Monsanto Company
Rafat Shahid, Alameda County Health Department
Lt. Mike Moore, USCG
Robert Ekedahl, Sonoma Pacific

TABLE 2-1
Rev. 4-10-88

SOIL BORING INFORMATION

BORING/WELL NUMBER	PROPOSED DEPTH, FT	SOIL SAMPLING SCHEDULE		PURPOSE/RATIONALE
		DEPTHS	ANALYTICAL METHODS*	
W12R	20	NONE	NA	REPLACE DESTROYED WELL W12
W16	20	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080	MONITOR SHALLOW AQUIFER IN SOUTHWEST CORNER OF SITE
W17	20	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080	MONITOR SHALLOW AQUIFER UNDERLYING FORMER DRUM STORAGE AREA WEST OF W6
W18	20	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080,	MONITOR SHALLOW AQUIFER ALONG THE WATERFRONT ON THE WEST SIDE OF THE SITE
W19	20	5 FT. INTERVALS STARTING @ SURF	8010, 8020, 8040, 8080	PROVIDE INFORMATION ON SHALLOW AQUIFER IN FORMER DRUM STORAGE AREA BETWEEN WELLS 6 AND 9
W20	50	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080	MONITOR DEEPER AQUIFER IN THE VICINITY OF WELL 9
W21	20	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080,	ESTABLISH OFF-SITE UPGRADIENT MONITORING WELL
W22	20	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080,	MONITOR SHALLOW AQUIFER ON SOUTH EDGE OF PROPERTY DOWNGRADIENT FROM W6

*Six soil samples will be selected for Method 8280 Analysis (Dioxins and Furans) based on results of PCP analyses.

TABLE 2-1
Rev. 4-10-88

SOIL BORING INFORMATION

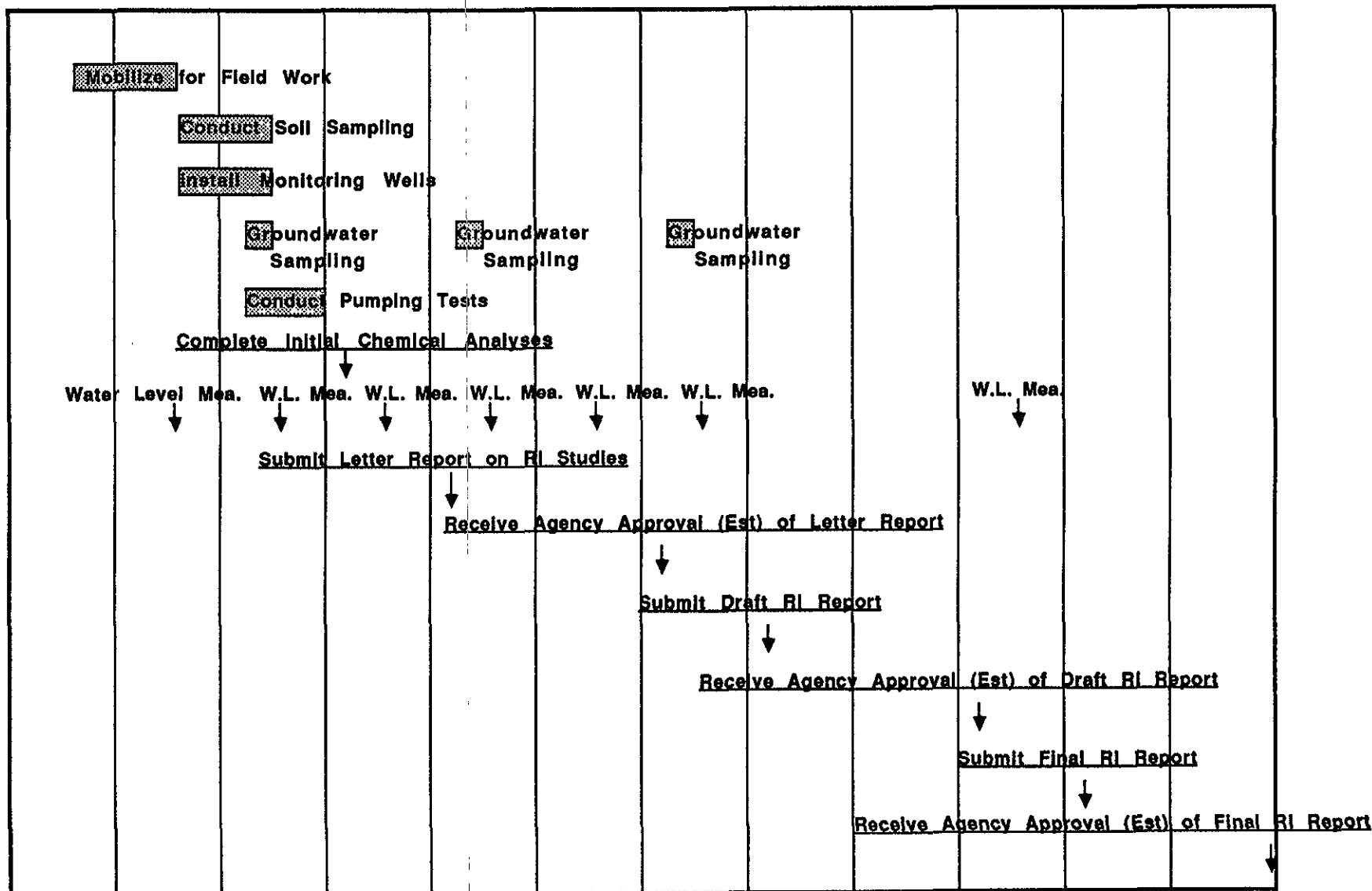
BORING/WELL NUMBER	PROPOSED DEPTH, FT	SOIL SAMPLING SCHEDULE		PURPOSE/RATIONALE
		DEPTHS	ANALYTICAL METHODS*	
B23	50	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080,	PROVIDE DEEP LITHOLOGY AND SOIL SAMPLES FROM FORMER DRUM STORAGE AREA NEAR SOUTHWEST CORNER OF SITE
B24	20	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080	COLLECT SOIL SAMPLES IN FORMER GRID NUMBER 11
B25	50	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080	COLLECT DEEP SOIL SAMPLES NEAR W6
B26	20	5 FT. INTERVALS STARTING @ SURF	8020, 8040, 8080,	PROVIDE SOIL SAMPLES IN VICINITY OF FORMER SMALL TANKS
B27	20	5 FT. INTERVALS STARTING @ SURF	8010, 8020, 8040, 8080,	PROVIDE SOIL SAMPLES AT LOCATION OF FORMER DRUM CLEANING BUILDING

*Six soil samples will be selected for Method 8280 Analysis (Dioxins and Furans) based on results of PCP analyses.

TABLE 6-1
PROPOSED PROJECT SCHEDULE

Rev. 4-11-88

4/1/88 5/1/88 6/1/88 7/1/88 8/1/88 9/1/88 10/1/88 11/1/88 12/1/88 1/1/89 2/1/89 3/1/89 4/1/89

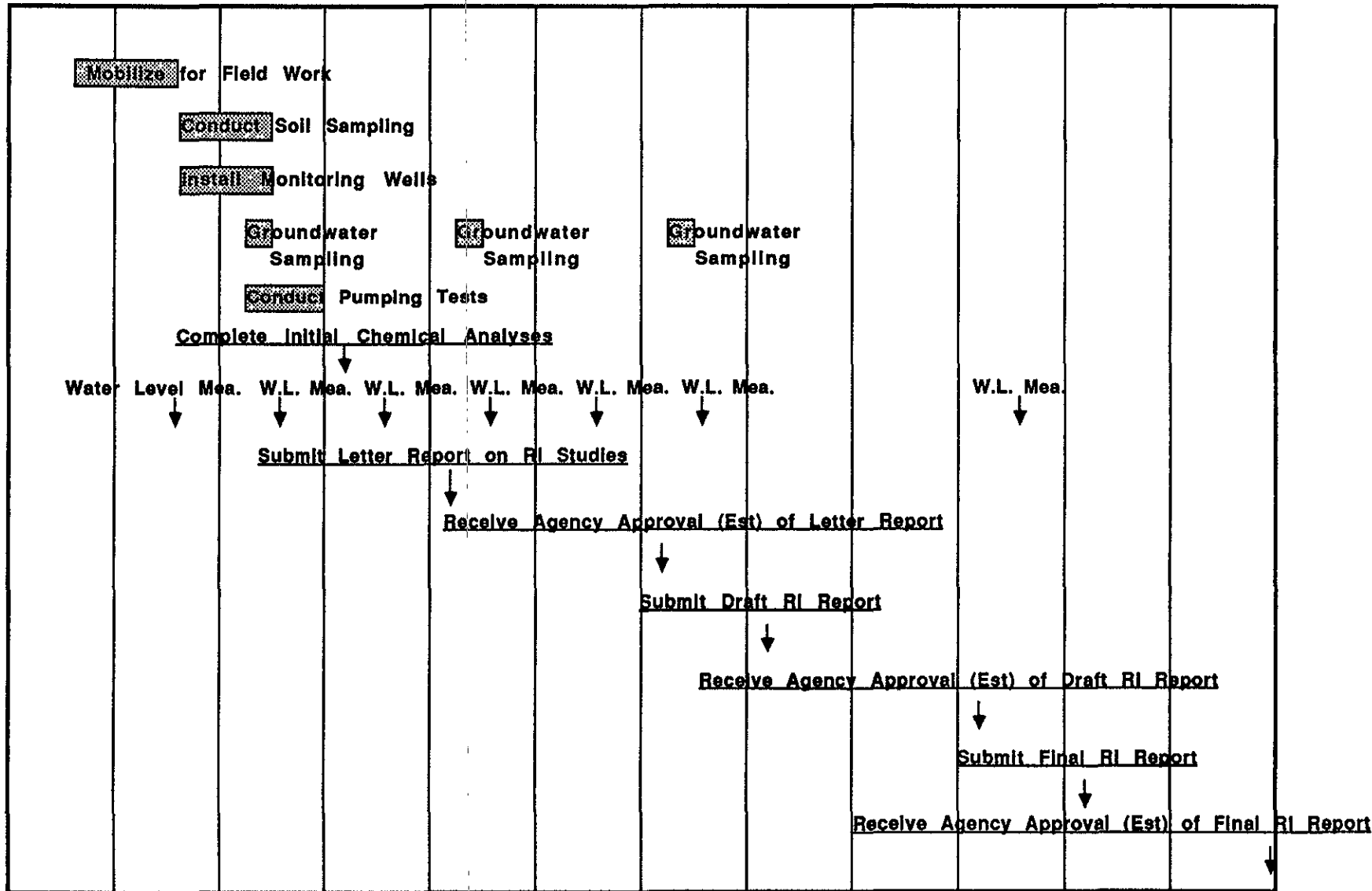


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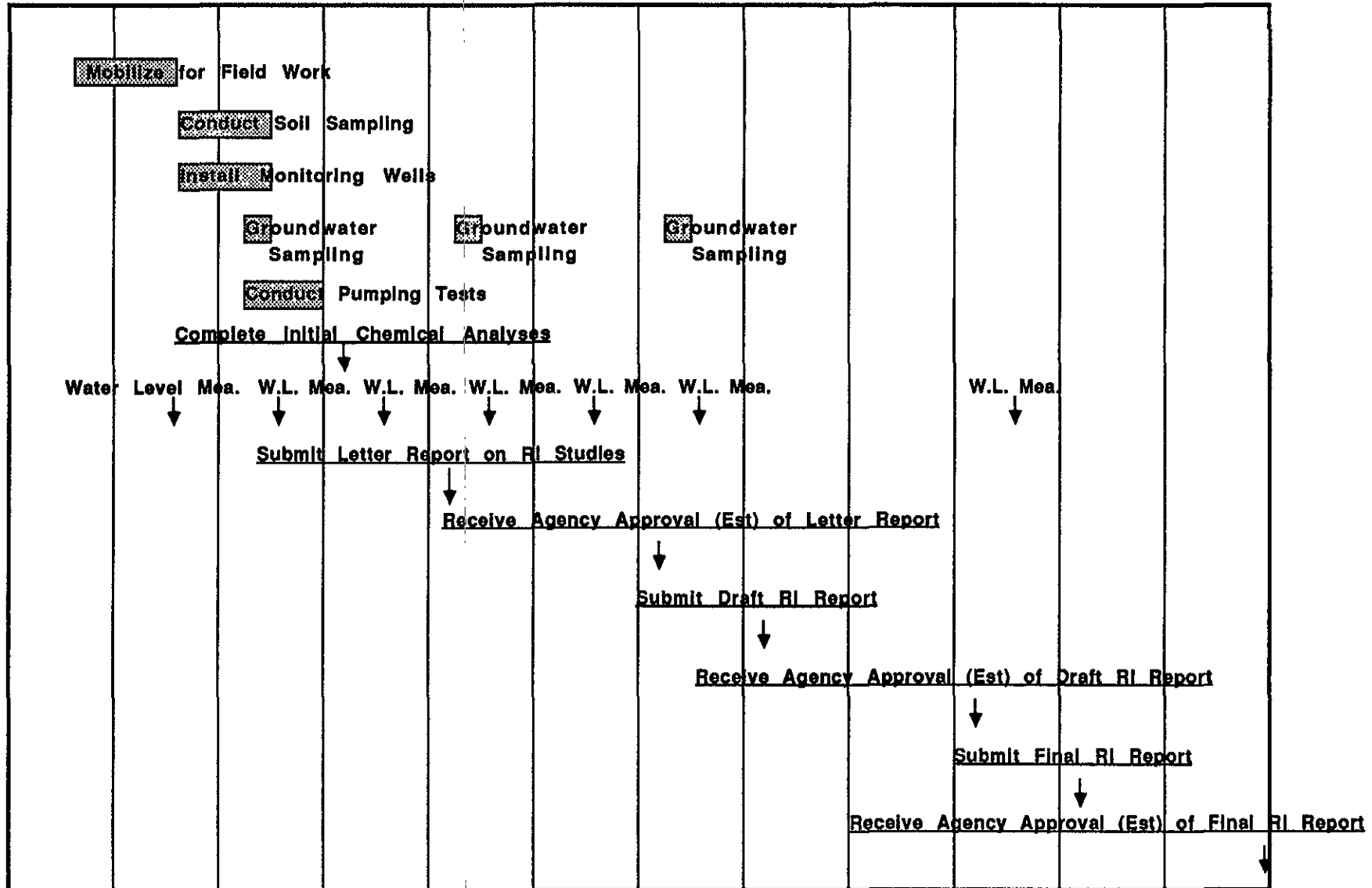


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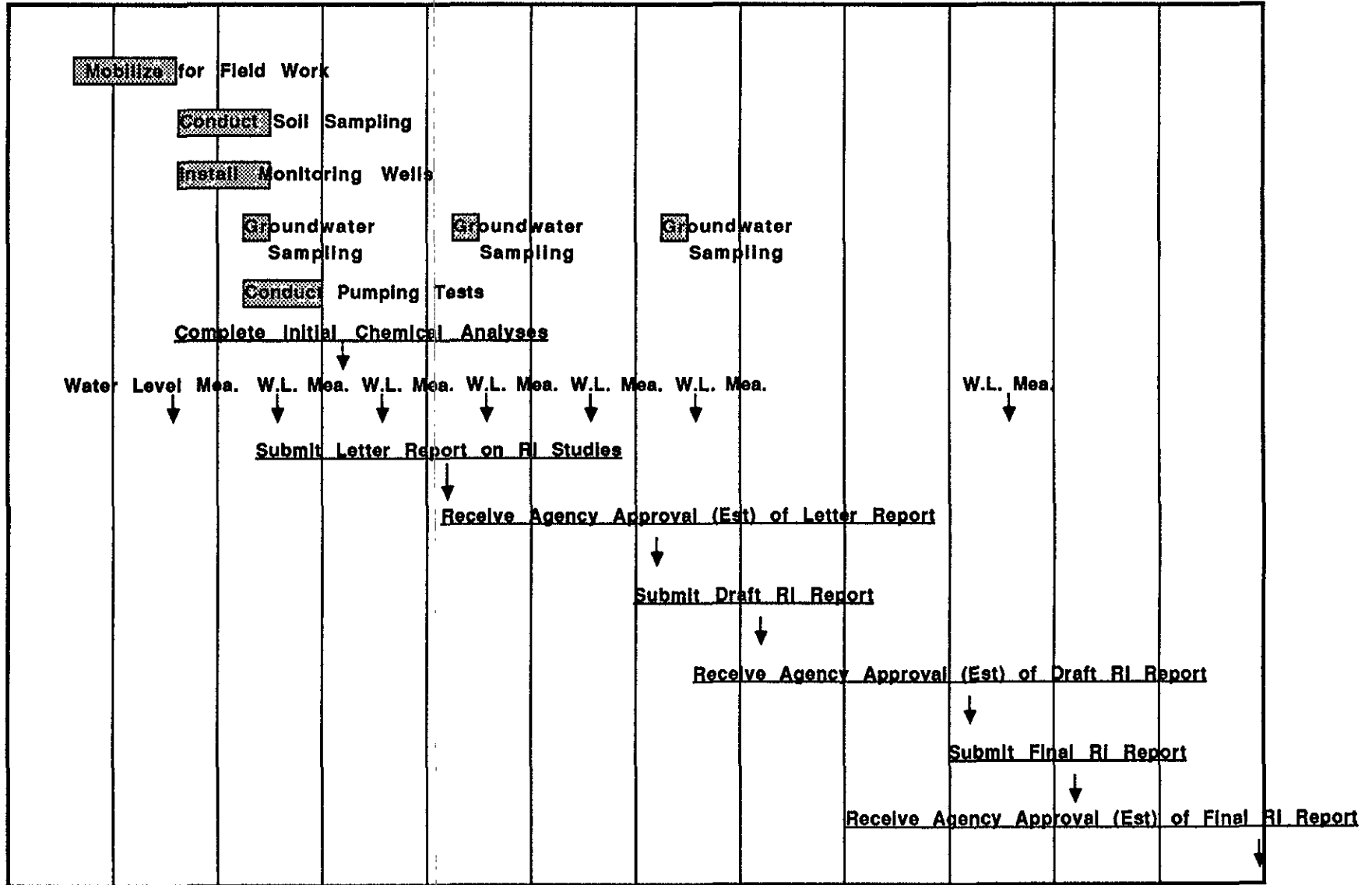


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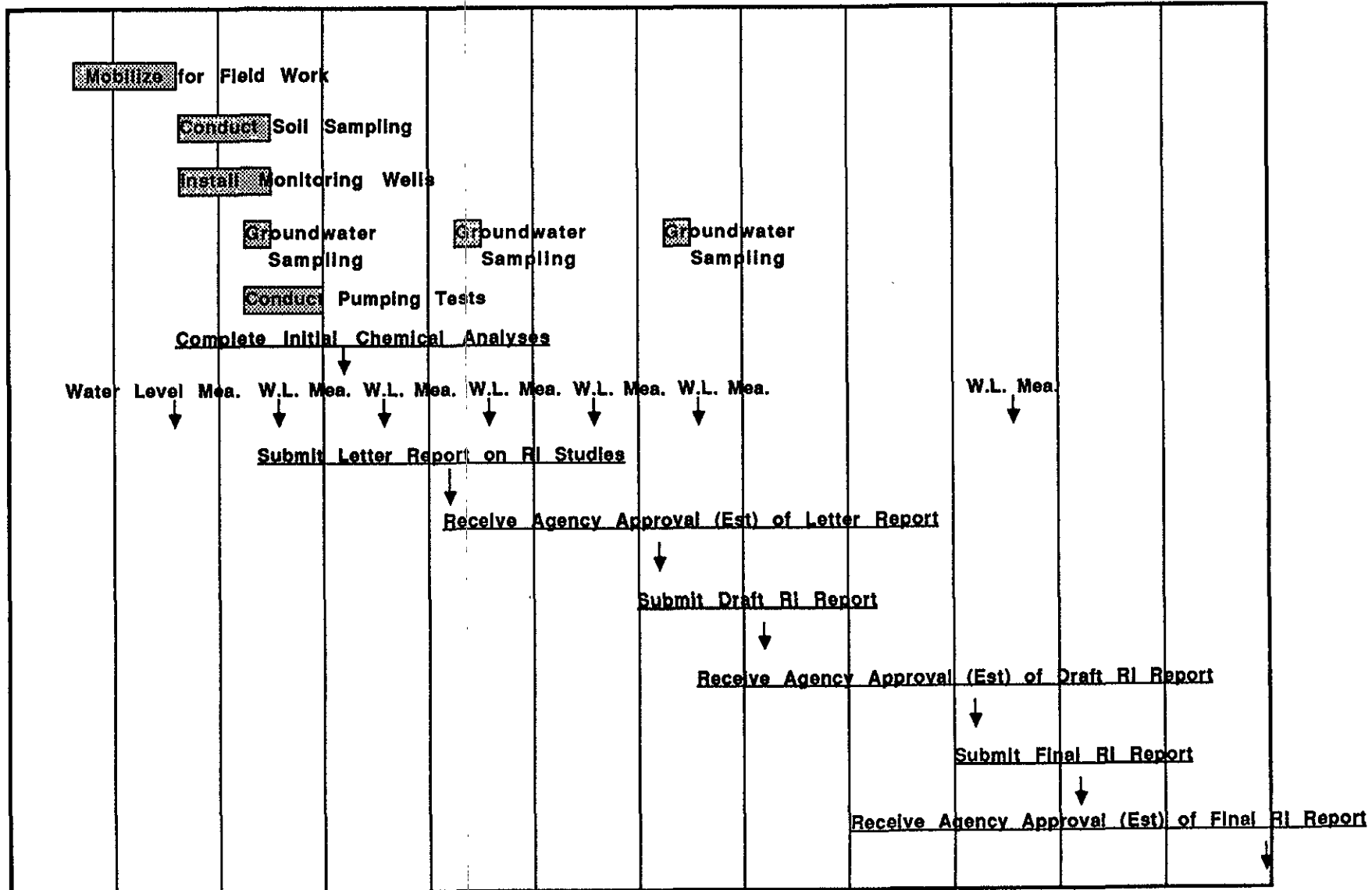


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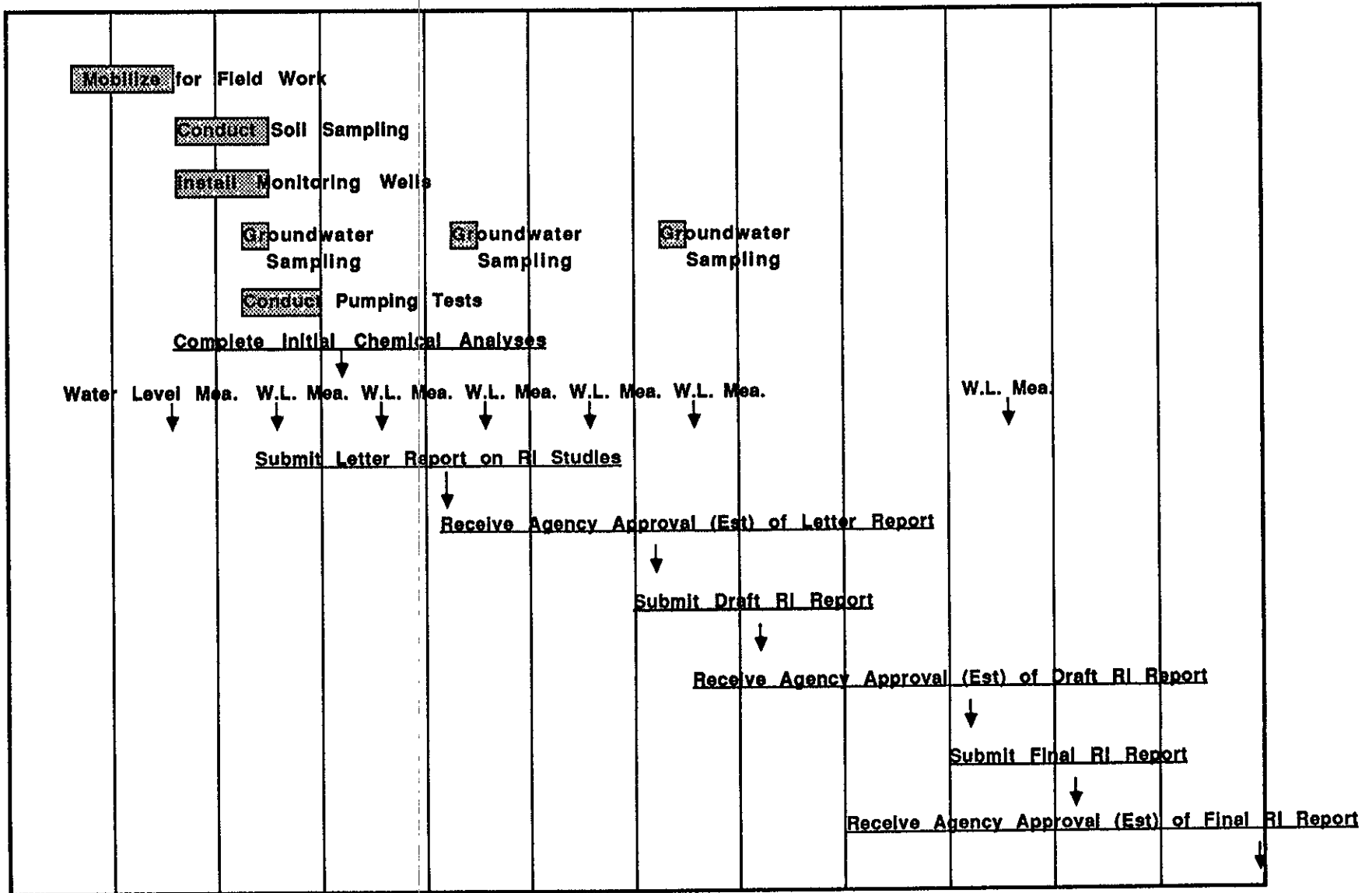


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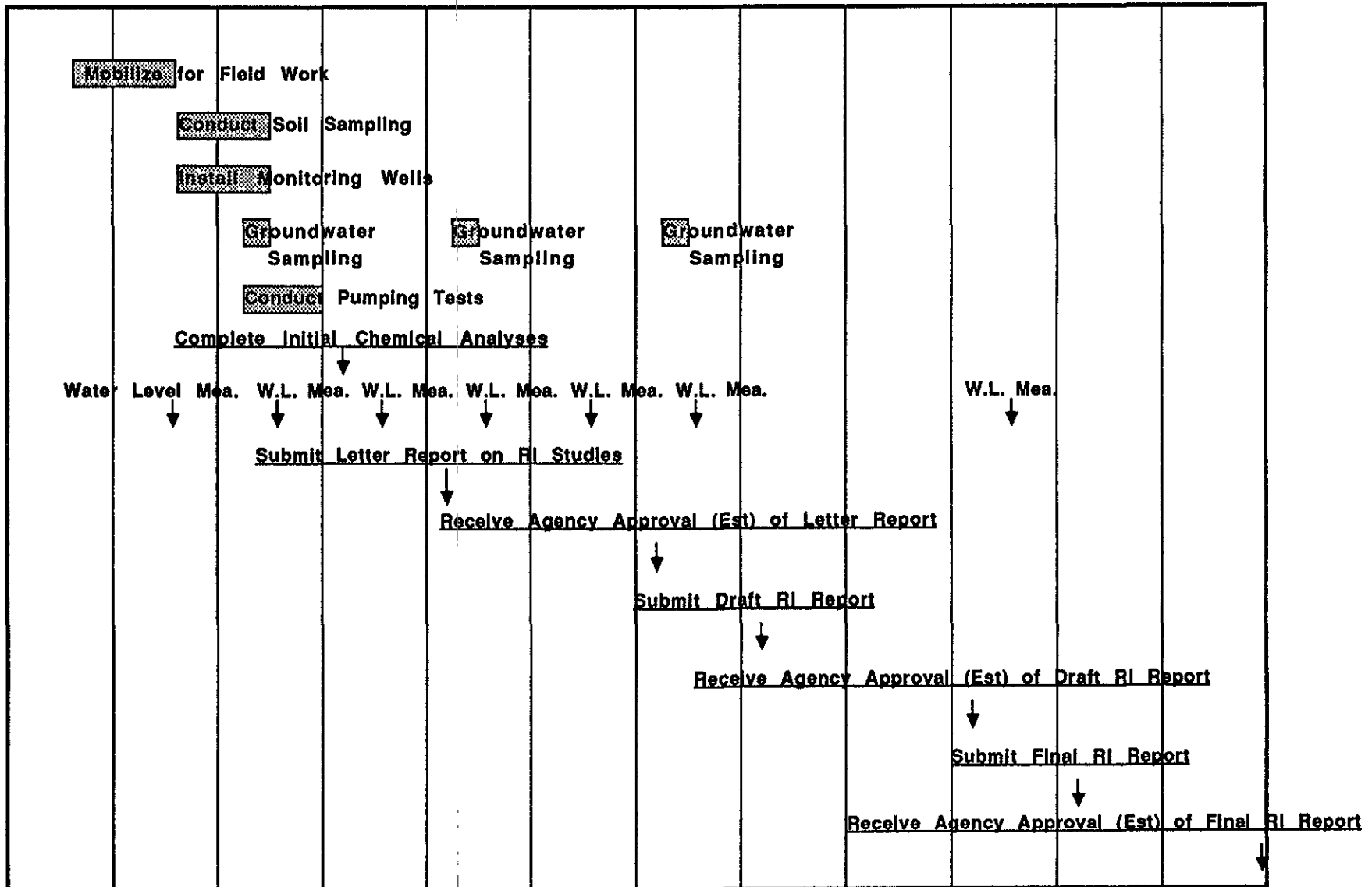


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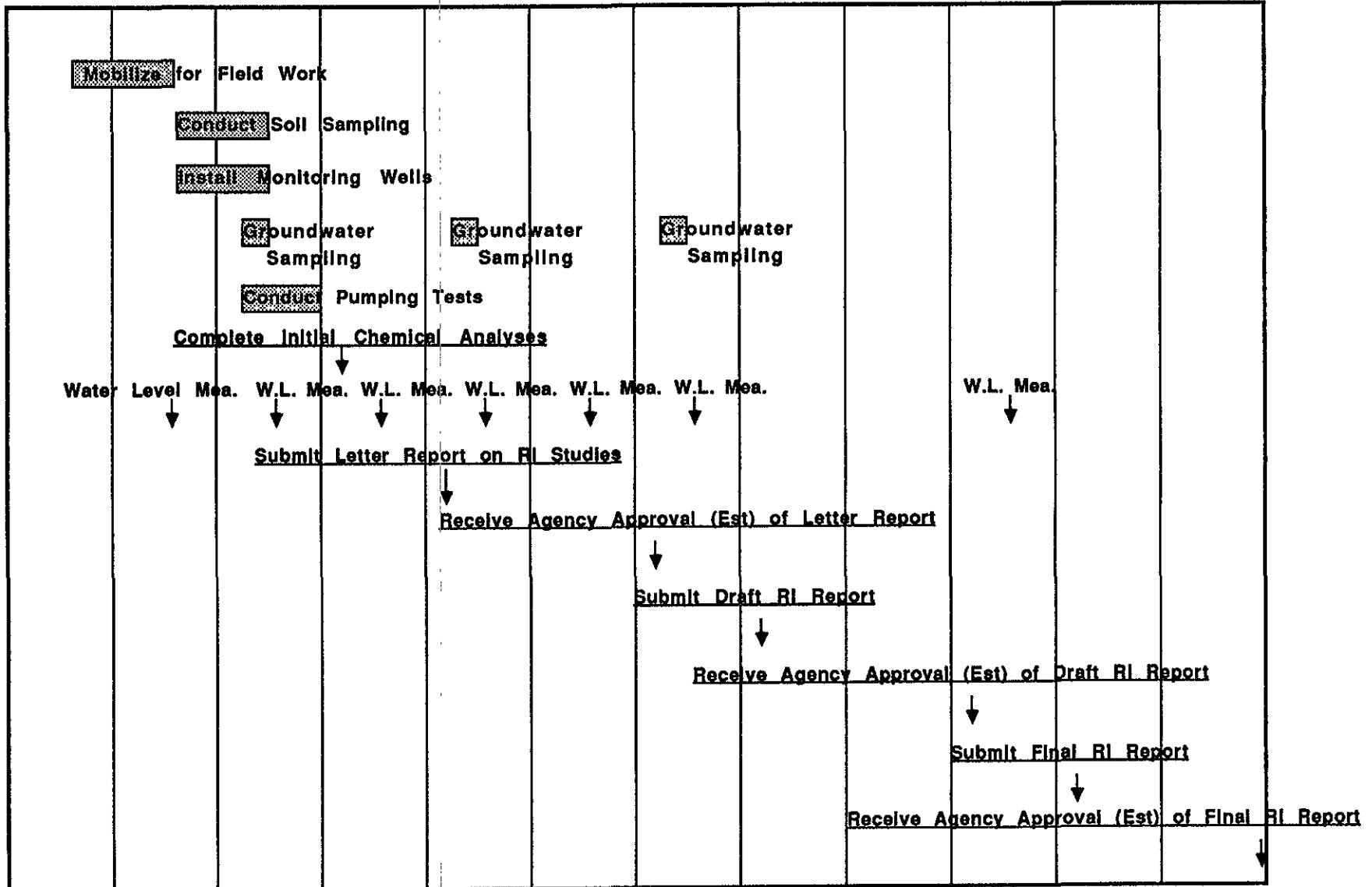


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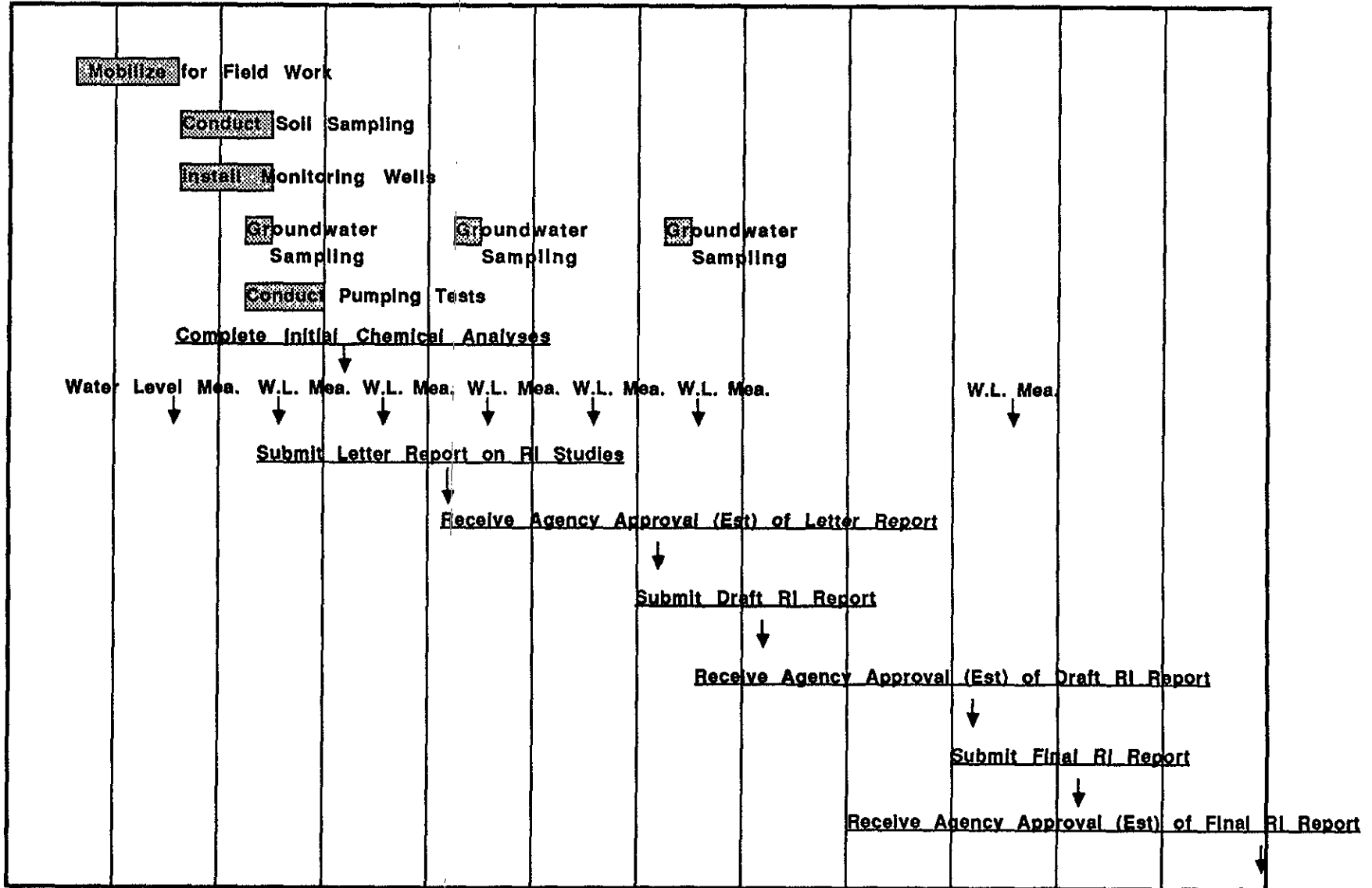


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