



# PORT OF OAKLAND

8 February 2011

Mr. Paresh Khatri  
Alameda County Department of Public Health  
1131 Harbor Bay Parkway, Suite 200  
Alameda, CA 94502-6577

**RECEIVED**

9:34 am, Feb 10, 2011

Alameda County  
Environmental Health

**Subject: Port of Oakland Comments on Second Annual 2010 Event, Groundwater Monitoring and Sampling Report, Rolls-Royce Engine Services Test Facility, 6701 Old Earhart Road, Oakland, California, Alameda County Site #RO0002606**

Dear Mr. Khatri:

Enclosed please find a letter, dated 7 February 2011 prepared on the behalf of the Port of Oakland by BASELINE Environmental Consulting. The letter presents comments on *Second Annual 2010 Event, Groundwater Monitoring and Sampling Report, Rolls-Royce Engine Services Test Facility, 6701 Old Earhart Road, Oakland, California, Alameda County Site #RO0002606* ("Report"), prepared by Gettler-Ryan on behalf of Rolls-Royce Engine Services-Oakland, Inc. ("RRESO").

I declare under penalty of perjury that the information and/or recommendations contained in the attached letter is true and correct to the best of my knowledge.

Sincerely,

Diane Heinze, Port Environmental Assessment Supervisor  
Port of Oakland  
Environmental Programs and Planning

cc: Donna Drogos, Alameda County Department of Environmental Health  
Michele Heffes, Port of Oakland  
Dale Klettke, Port of Oakland  
Colleen Liang, Port of Oakland  
Chris Noma, Wendel Rosen Black & Dean  
David Goldberg, RRESO

**BASELINE**  
ENVIRONMENTAL CONSULTING

7 February 2011  
Y7335-01

Mr. Paresh C. Khatri  
Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway, Suite 200  
Alameda, CA 94502-6577

**Subject: Port of Oakland Comments on Second Annual 2010 Event, Groundwater Monitoring and Sampling Report, Rolls-Royce Engine Services Test Facility, 6701 Old Earhart Road, Oakland, California, Alameda County Site #RO0002606**

Dear Mr. Khatri:

On behalf of the Port of Oakland (“Port”), BASELINE Environmental Consulting (“BASELINE”) is submitting this comment letter for your consideration concerning the *Second Annual 2010 Event, Groundwater Monitoring and Sampling Report, Rolls-Royce Engine Services Test Facility, 6701 Old Earhart Road, Oakland, California, Alameda County Site #RO0002606* (“Report”), prepared by Gettler-Ryan on behalf of Rolls-Royce Engine Services-Oakland, Inc. (“RRESO”) regarding the test cell facility (“site”). The Port, the owner of the site which is leased to RRESO, had not reviewed the Report prior to RRESO’s submittal of it to the Alameda County Department of Environmental Health (“ACEH”). Upon our review of the Report on behalf of the Port, we have the following comments:

- The Report concludes that the groundwater analytical results show a stable to decreasing concentration of Total Petroleum Hydrocarbons (“TPH”) as diesel, motor oil, and jet fuel. While it is true that since the initial sampling events in 2007 and 2008, the concentrations of these compounds have been reduced, some wells have shown a significant increase in concentrations, particularly TPH diesel and motor oil, from previous monitoring events. For example, in MW-7, TPH as diesel increased from less than reporting limit to 1,800 ug/L and TPH as motor oil from less than reporting limit to 6,800 ug/L since December 2008. Similarly, in MW-9, TPH diesel increased from 600 ug/L to 1,900 ug/L and TPH as motor oil increased from 1,100 ug/L to 4,500 ug/L since September 2009. This indicates that the concentrations in certain wells on the site, specifically in the western portion, are neither stable nor decreasing.

**BASELINE recommends that the ACEH not approve RRESO’s request to reduce the monitoring frequency from semi-annually to annually. In addition, BASELINE recommends that RRESO further investigate and explain the increasing trend for concentrations of compounds that have increased in September 2010 from previous monitoring events.**

Donna Drogos  
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- The Report includes results from analysis of dissolved methane from some on-site wells (MW-1, MW-4 to MW-7, and MW-9), one of the Port's off-site well located northwest of the site (NPROD MW-3), and one RRESO well located just outside the site in a drainage channel area (MW-8). The dissolved methane concentrations in all on-site wells and the RRESO well in the drainage ditch near the site boundary had concentrations of dissolved methane in the groundwater several orders of magnitude greater than the Port off-site well. This suggests that the methane in groundwater may be related to on-site operations (and releases of TPH). In a letter from Dale Klettke of the Port to Wing Yan Suen with ACEH, dated 1 November 2010 (with a copy to Paresh C. Khatri of ACEH), the Port indicated its intent to request that all TPH-related contamination at the site be overseen by the Alameda County Local Oversight Program ("LOP").

**BASELINE respectfully requests that soil gas issues at the site be regulated by the LOP instead of by the Alameda County Office of Solid and Medical Waste Management.**

- The Report also recommends discontinuing analyses for naphthalene in all monitoring wells except MW-10, MW-13, and MW-14 due to the limited or lack of presence of naphthalene in groundwater from these wells for several years.

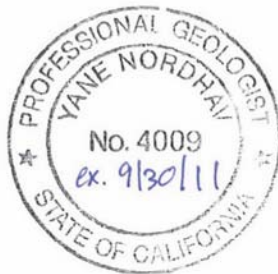
**BASELINE concurs with this recommendation.**

BASELINE and the Port appreciate your consideration of these comments as you review the Report. Should you have any questions regarding these comments, please contact Colleen Liang at the Port ([cliang@portoakland.com](mailto:cliang@portoakland.com) or 510-627-1198) or myself ([yane@baseline-env.com](mailto:yane@baseline-env.com) or 510-420-8686) at your convenience.

Sincerely,



Yane Nordhav, P.G.  
Principal



cc: Donna Drogos, Alameda County Department of Environmental Health  
Michele Heffes, Port of Oakland

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