

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Monday, April 13, 2015 5:27 PM  
**To:** 'lamancus@up.com'  
**Cc:** 'sapearso@up.com'; 'scott.hackman@arcadis-us.com'; Roe, Dilan, Env. Health  
**Subject:** Site Clean Up case RO3169 - Diesel locomotive released, 1408 Middle Harbor Road, Oakland

Dear Ms. Mancuso,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Updated Soil Excavation Work Plan* (Work Plan), dated April 8, 2015, which was prepared by Arcadis U.S. Inc. (Arcadis). for the subject site. The Work Plan proposes using a photoionization detector (PID) and general field observations to determine the extent of excavation limits following the release of red-dyed diesel fuel. On March 26, 2015, ACEH was notified by CalOES spill notification center that a diesel locomotive released approximately 4,000 gallons of diesel fuel on to the ground at 1408 Middle Harbor Road, Oakland. The diesel has impacted soil in an area of the rail yard approximately 200 feet by 30 feet on track 58.

The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

### Technical Comments

1. Sample Density- The Work Plan proposes sampling at an approximate rate of one sample per 100 linear feet of excavation sidewall.

The standard protocol for excavation sampling is one sample for every 20 linear feet of sidewall. Therefore, ACEH requests that one sample be collected for every 20 linear feet of sidewall. However, you may submit every other sample for laboratory analysis. Should concentrations above the laboratory detection limit be reported, please submit the adjoining samples for analysis.

2. Sample Bias- When recovering sidewall samples for analysis, ACEH requests the samples collected should be positively biased toward areas of suspected contamination.
3. Analysis Scope- The Work Plan proposes analyzing for total petroleum hydrocarbons (TPH) in the C4-C40 range using EPA test method 8015B.

In addition to the C4-C40 TPH analysis, ACEH requests that samples submitted for laboratory analysis include benzene, toluene, ethylbenzene, and xylenes (BTEX) and naphthalene using EPA test method 8260B.

4. Groundwater- During a phone conversation on April 13, 2015 with Mr. Scott Hackman of Arcadis, Mr. Hackman indicated the depth of the excavation was one-foot below the depth to water. ACEH requests a grab groundwater sample be recovered for laboratory analysis.
5. Import Fill- Please provide ACEH with documentation demonstrating the cleanliness of the import material used to backfill the excavation. The documentation should be included in the report requested below.
6. Report Submittal- Please provide a report, by the date specified below, documenting site activities associated with the investigative and remedial activities associated with the response to the diesel fuel release.

## 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:

- **May 14, 2015– Soil and Groundwater Investigation** (file name: RO0003169\_SWI\_R\_yyyy-mm-dd)

This report is 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.

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>