

June, 2013

Response to Alameda County LOP Comments

Claim 10630

Summary

This Site is located in downtown Oakland, across the street from a Kaiser Permanente Hospital and associated parking structure. The parking structure has a groundwater dewatering and ventilation system that is operated continuously in order to keep the lower portion of the parking structure dry (30+ feet) and the carbon monoxide vapors from accumulating in the structure. Groundwater historically ranges between 14 to 19 feet below grade and the dewatering system collects, treats and discharges to the East Bay Municipal Utility District (EBMUD) sanitary sewer. The discharged water is treated a second time by EBMUD prior to discharge to the Bay. Groundwater flow in the area has consistently flowed toward the parking structure since constructed.

Alameda County's Summarized Comments to Closure Summary

1. Unidentified Creek

RESPONSE: The creek is in an underground concrete culvert that extends at least 1,000 feet northeast and southwest of the hospital and parking structure. It is located on the northwest side of the KP property and was not seen during our evaluation. The RSR has been revised as the result of this new information. After further evaluation, instead of using Class 2, the Site meets the Policy criteria for Class 5.

The bottom of the culvert (creek) is located at 12 feet bgs (Oakland Public Works, 2013) and groundwater is at 19 feet bgs prior to the dewatering associated with the parking structure that maintains groundwater at a depth in excess of 30 feet bgs.. The minimum historical groundwater depth was 14 feet bgs. Groundwater dewatering beneath the parking structure has to be maintained or the lower levels of the structure will flood. Therefore, the contaminated groundwater and the surface water body will never come into hydraulic contact.

2. The CSM is incomplete

RESPONSE: Although not compiled into one single document, the CSM is complete, as defined by the Policy. This site has been overseen by Alameda County LOP for about 20 years. Many phases of assessments have been approved by the LOP and completed.

3. Plume is undefined

RESPONSE: Data from routine monitoring of groundwater from the Site's established monitoring system define the plume, which is limited in size, stable, and declining in concentration. The County's comment relies on unreliable data from a grab groundwater sample collected in a temporary boring. Grab samples from a boring, although often useful for qualitative assessment, do not compare well quantitatively with groundwater data collected from properly constructed monitoring wells. Grab groundwater samples, with the entrainment of possibly contaminated soil particles, commonly overestimate

dissolved contaminant concentrations and do not meet any industry quality control standards.

4. Groundwater/Vapor Intrusion Issues

RESPONSE: The structures of concern to the County are the Kaiser Permanente facility. However, potential impacts are insignificant. The concentrations are extremely low in groundwater. In addition, the groundwater in the area is captured by the dewatering of the lower levels of the garage 24-hours per day. The extracted groundwater is treated and discharged to the EBMUD sanitary sewer and treated a second time prior to discharge to the Bay.

In addition, the garage has a ventilation system that operates constantly to prevent carbon monoxide (vehicle exhaust) from accumulating in the structure. Any vapors from petroleum hydrocarbons from the Site would not only be over-shadowed by emissions from exhaust but would be captured by the ventilation system. Both the groundwater and ventilation systems have emergency generators to maintain operation in the event of a power outage.