ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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March 18, 2008

Mr. Robert E. Zimmermann
Roadway Express Inc.
P.O. Box 471
Akron, OH 44309-0471

Subject: Fuel Leak Case No. RO0000039 and Geotracker Global ID T0600102107,
Roadway Express, 1708 Wood Street, Oakland, CA 94607

Dear Mr. Zimmermann:

This letter is sent in response to our meeting with Mr. Ruben Byerley and your environmental consultants Mr. Patrick Bratton and Mr. Gary Messerotes with Burns & McDonnell, on Tuesday, March 18, 2008 at our office. The meeting was to discuss the findings summarized in the document entitled, "Site Investigation" [Report], dated February 5, 2008, which was prepared by Burns & McDonnell, and discuss the next appropriate course of action for the site. Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted above-mentioned Report. The report details the installation of six direct push borings in the vicinity of the central eastern portion of the site where the former fuel and waste oil USTs had been removed and the installation of 3 boring surrounding the abandoned-in-place USTs, located in the northwest portion of the site. Elevated concentrations of total petroleum hydrocarbons (TPH) as diesel (d), motor oil (mo) and total oil and grease (TOG) were detected in several "grab" groundwater samples collected from the site.

ACEH generally concurs with Burns & McDonnell's recommendation to prepare a work plan and requests that you address the following technical comments and send us the technical reports described below.

TECHNICAL COMMENTS

1. **Monitoring Wells and Hydrogeologic Setting** – Monitoring well MW-2 is installed to a depth of approximately 9.2 feet bgs with a screened interval from 0.5 feet to 9.2 feet bgs. Monitoring wells MW-3, MW-4, and MW-5 are installed to a depth of 30 feet below the ground surface (bgs) with a screened interval from 10 feet to 30 feet bgs. Depth to groundwater at the site ranges from approximately 3.66 feet bgs to 5.45 feet bgs. Since groundwater elevation is above the screened interval for monitoring wells MW-3, MW-4, and MW-5 and petroleum hydrocarbons have a specific gravity that is lower than water (therefore, float on water); concentrations of contaminants may not be representative of actual site conditions. Therefore, the monitoring wells MW-3, MW-4, and MW-5 appear to be incorrectly constructed, which may affect the contaminant concentrations detected in groundwater. Another concern is regarding the shallow screened interval of groundwater monitoring well

MW-2, which is reported to be from 0.5 feet to 9.2 feet bgs. Specifically, the sanitary seal for MW-2 may not be constructed in accordance with California Well Standards and may pose a potential preferential pathway for surface contaminants to the subsurface. Please evaluate and discuss the effect that groundwater elevations rising above monitoring well screens have on hydrocarbon concentrations for each monitoring well at the site as well as the shallow screen interval and construction of MW-2. It may be advantageous to collect depth discrete groundwater samples or install multi-level monitoring wells, monitoring well clusters, or systems capable of monitoring multiple depths. Please address the above-mentioned concerns and include your analysis in the work plan requested below.

2. **Preferential Pathway Study** – The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

   Discuss your analysis and interpretation of the results of the preferential pathway study and report your results in the soil and groundwater investigation work plan requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

   a. Utility Survey

   An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

   b. Well Survey

   The preferential pathway study shall include a detailed well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a ¼ mile radius of the subject site. As part of your detailed well survey, please perform a background study of the historical land uses of the site and properties in the vicinity of the site. Use the results of your background study to determine the existence of unrecorded/unknown (abandoned) wells, which can act as contaminant migration pathways at or from your site. Please review and submit copies of historical maps, such as Sanborn maps, aerial photographs, etc., when conducting the background study.

3. **Soil and Groundwater Characterization** – The vertical and lateral extent of the hydrocarbon plume in groundwater appears uncharacterized at this time. The groundwater flow direction has been reported in September 1999 to be in a southeasterly direction. However, more recent calculations indicate a northwesterly groundwater flow direction.

   Elevated concentrations of petroleum hydrocarbons have been detected in "grab" groundwater samples collected at the site. Analytical results from "grab" groundwater

samples collected from boring BM-8 and BM-9, located in the northwest portion of the site, detected 61,000 µg/L TPH-d and 1,200 µg/L TPH-d, respectively. In the central portion of the site, 28,000 µg/L TPH-d was detected in a "grab" groundwater sample collected from BM-2. A lower concentration of TPH-d (120 µg/L) was detected in a groundwater sample collected from monitoring well MW-2. In summary, the analytical results, compounded with a significantly varied groundwater flow direction, have made it difficult to determine whether the hydrocarbon plume is adequately assessed. Please address the above-mentioned concerns and submit a work plan.

4. **GeoTracker Compliance** – A review of the case file and the State Water Resources Control Board's (SWRCB) GeoTracker website indicate that electronic copies of analytical data have not been submitted, rendering the site to non-compliance status. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please complete the surveying and upload all applicable electronic submittal types such as the analytical data (EDF), survey data (GEO_XY and GEO_Z), and PDF reports from July 1, 2005 to current to GeoTracker. Electronic reporting is described below.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains only the electronic reports as listed on our website (http://www.acgov.org/aceh/lop/ust.htm). You are requested to submit copies of all other reports related to environmental investigations for this property (including Phase I and Phase II reports) by **April 30, 2008**.

TECHNICAL REPORT REQUEST

Please submit a Work Plan, FS/CAP, and technical reports to Alameda County Environmental Health (Attention: Paresh Khatri), according to the following schedule:

- **April 30, 2008** – Quarterly Monitoring Report (1st Quarter 2008,)
- **May 6, 2008** – Soil and Water Investigation Work Plan (including Preferential Pathway evaluation)
- **July 30, 2008** – Quarterly Monitoring Report (2nd Quarter 2008)

- **October 30, 2008** – Quarterly Monitoring Report (3rd Quarter 2008)
- **January 30, 2009** – Quarterly Monitoring Report (4th Quarter 2008)

These reports are 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.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to

present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at Paresh.Khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ruben Byerley, YRC North American Transportation, Inc., 10990 Roe Avenue, Overland Park, KS 66211
Gary Messerotes, Burns & McDonnell, 393 East Grand Avenue, Suite J, South San Francisco, CA 94080
Patrick Bratton, Burns & McDonnell, 393 East Grand Avenue, Suite J, South San Francisco, CA 94080
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032
Donna Drogos, ACEH
Paresh Khatri, ACEH
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