

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

May 29, 2008

Mr. Steve Shinnors  
Senior Manager – Safety, Health and Environmental Services  
YRC Worldwide, Inc.  
10990 Roe Avenue – A605  
Overland Park, Kansas 66211

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

Dear Mr. Shinnors:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Additional Site Assessment Workplan," dated May 6, 2008, which was prepared by Burns & McDonnell for the subject site.

ACEH generally concurs with the proposed scope of work and requests that you address the following technical comments, perform the proposed work, and send us the technical reports described below.

**TECHNICAL COMMENTS**

1. **Groundwater Contaminant Plume Monitoring** – Burns & McDonnell propose to extract groundwater from monitoring well MW-2 and then abandon the well due to its construction, install direct push borings and collect soil and "grab" groundwater samples from the first encountered water bearing zone (shallow groundwater) at the site. Then the boring will be advanced to depths of approximately 25 feet bgs to obtain additional soil and "grab" groundwater samples from the second water-bearing zone (deeper groundwater). According to Burns & McDonnell, groundwater monitoring wells MW-3, MW-4, and MW-5 appear to adequately assess the contaminants that may be present in the deeper water bearing zone. However, elevated concentrations of contaminants have been detected in shallow groundwater monitoring well MW-2, which is proposed to be abandoned. It appears that permanent monitoring points in the shallow water-bearing zone may be necessary to adequately monitor post-remedial concentrations and groundwater contaminant plume stability, based on previously collected analytical data.
2. **Preferential Pathway Evaluation** – The preferential pathway evaluation is presented in Section 6 of the above-mentioned report. However, an adequate discussion on whether preferential pathway(s) exist at the site was not presented and only figures that depict utilities

were provided without an evaluation of potential migration discussed in the text. The discussion at a minimum should include depths of utilities, backfill materials, depth to groundwater and whether those utilities may act as preferential pathways. Please submit a revised discussion in the subsurface investigation report due by the date specified below.

3. **GeoTracker Compliance** – As a reminder, all reports must also be uploaded to the State Water Resources Control Board's (SWRCB) GeoTracker website (in addition to the ACEH ftp website) and that a complete report submittal included the report submittal and all associated and applicable electronic files (i.e. GWM\_R, GEO\_WELL, GEO\_XY and GEO\_Z etc.). Please complete all uploads to GeoTracker within thirty days from the date of this letter. Electronic reporting is described below.

### **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:

- **July 28, 2008** – Soil and Water Investigation Report (including Preferential Pathway evaluation)
- **July 30, 2008** – Quarterly Monitoring Report (2<sup>nd</sup> Quarter 2008)
- **October 30, 2008** – Quarterly Monitoring Report (3<sup>rd</sup> Quarter 2008)
- **January 30, 2009** – Quarterly Monitoring Report (4<sup>th</sup> 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](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.

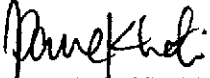
#### AGENCY OVERSIGHT

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.

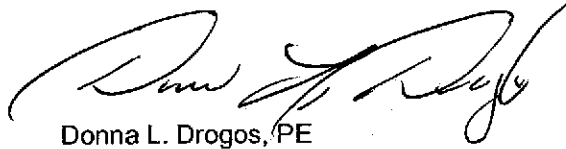
If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [Paresh.Khatri@acgov.org](mailto:Paresh.Khatri@acgov.org).

Mr. Shinnars  
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Sincerely,



Paresh C. Khatri  
Hazardous Materials Specialist



Donna L. Drogos, PE  
Supervising Hazardous Material 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  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> December 16, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective January 31, 2006, 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.

#### REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:  
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

#### Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

#### Submission Instructions

- 1) Obtain User Name and Password:
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
    - or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape and Firefox browsers will not open the FTP site.
  - b) Click on File, then on Login As.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by Report Upload. (e.g., Subject: RO1234 Report Upload)