Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Monday, December 22, 2014 2:32 PM
To: Ruben D. Byerley (ruben.byerley@yrcfreight.com)
Cc: D'Sa, Christopher P (Chris); 'MWard@psai-cre.com'
Subject: FUEL LEAK CASE RO39 - ROADWAY EXPRESS, 1708 WOOD ST., OAKLAND , CA 94607

Dear Mr. Byerley,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the draft *Site Management Plan* (SMP) dated December 12, 2014 and prepared by Burns and McDonnell Engineering Company (Burns and McDonnell) for the subject site. Please keep in mind the purpose of the SMP when revisiting the document. Following are general and specific comments regarding the SMP:

General Comments:

1. Page 1, 2nd paragraph: As of this writing, ACEH is *in the process of granting* regulatory closure of the Site after Burns & McDonnell has conducted cleanup to commercial standards as required by ACEH. *In the process of granting* should be changed to *In the process of granting regulatory closure contingent upon ACEH approval of an SMP*.

2. Page 1, 2nd paragraph: "There is also potential for residual metals to remain as a result of *historical industrial activities*, possibly, unrelated to YRC." Should be changed to "… *historical industrial activities and potential contaminants in import fill*."

3. Page 1, Area 1: identifies one of the USTs as a waste oil (WO) tank. As this tank has been referenced as a UST, a motor oil tank, and a waste oil tank, please provide supporting documentation for the tank being a WO UST.

4. Page 2, un-filled bullet item: "There are no groundwater monitoring wells located in Area 1" should be changed to "There are no groundwater monitoring wells located in Area 1 *to document the potential for residual groundwater contamination in this area*.

5. Page 2, last paragraph: "…The Owner's consultant ACC (Phase II ESA- Limited Soil and Groundwater Investigation - ACC, 2013) - this document has not yet been uploaded to the State GeoTracker or County FTP websites. Therefore, please upload the document to the State GeoTracker and County FTP websites.

6. Page 2, last paragraph: "During the purchase of the Site, the Owner's consultant ACC … also identified other COCs, including metals and other analytes, in the soil and groundwater below the Site potentially originating from *historical industrial use* at the Site, unrelated to YRC and the ACEH Case*." "*Also identified other COCs, including metals and other analytes" – Please list the other COCs.

7. Page 2, last paragraph: *Historical industrial activities* –see bullet item 2 above.

8. Page 6, Item 4.3: "Grab groundwater sample BM-8 (2008) previously indicated the presence of TPHg and TPHd at concentrations of 54,000 micrograms per liter (µg/L) and 61,000 µg/L, respectively, adjacent to the abandoned-in-place USTs (Figure 3). **The location of BM-8 and the surrounding soil were excavated during UST removal in 2011**.

   Unless I'm mistaken, BM-8 provided the only groundwater sample in this area. One of the purposes of the SMP is provide information regarding the potential of encountering impacted soil and groundwater during subsurface activities. Hence, the paragraph should be expanded to address the lack of delineation of groundwater contamination in this area.

The comment "**The location of BM-8 and the surrounding soil were excavated during UST removal in 2011"** has the implication that all the contamination in the vicinity of BM-8 was removed. This comment should state The location of BM-8 and the surrounding soil were excavated *to a depth of five (5) feet* during UST removal in 2011.

9. Page 6, Item 4.3 Last paragraph: "A grab "water" sample was collected from inside each UST (post sand/slurry removal), Analytical results indicated concentrations of TPHg at 182 µg/L and 598 µg/L, TPHd at 2,180 µg/L and 2,250 µg/L, and TPHmo at 128 µg/L and 368 µg/L). Note that these results are not indicative of…." Please expand upon or provide rationale for including this statement as the concentrations reported in BM-8 are an order of magnitude above the concentrations of the contents of the USTs.

10. Page 7, Area 2, 2nd paragraph: This should be rewritten to address Area 2. BM-8 was in area 1.

SMP- Section 5.0 Comments:

Direct contact with metals in soil and how to manage metals-impacted groundwater.

11. Page 11, subsection 5.1: "It is possible that impacted soil and groundwater will be encountered in areas outside of the "area of concern." While this statement is accurate, it is also true that impacted soil and groundwater may also be encountered in areas inside of the "area of concern." Please expand discussion.

12. Page 11, subsection 5.1: "In addition, if contractors or their subcontractors observe conditions indicative of contamination anywhere on the Site, they will follow the protocols presented in this document." Rewrite to include the field screening methods used to identify elevated metals. Lead has been documented at concentrations exceeding the Direct Contact (Commercial/Industrial) ESLs.

13. Page 12, 1st paragraph: Spell check and punctuation.

14. Page 12, Subsection 5.3, 1st paragraph: This paragraph addresses structures encountered during excavation activities, not soil management. Nowhere in the SMP does it state soil should be placed on and/ or covered with plastic. The SMP must include protocols for stockpiling excavated soil.

15. Page 12, Subsection 5.3, 2nd paragraph: Rewrite to include the field screening methods used to identify elevated metals. Lead has been documented at concentrations exceeding the Direct Contact (Commercial/Industrial) ESLs.

16. Page 12, Subsection 5.3, last paragraph: Describe how you propose to protect workers in areas of elevated metals?

17. Page 13 subsection 6.1, 1st paragraph:

    The draft SMP contains several references to the low permeability soils at the site and the lack of groundwater recharge. Groundwater is shallow at the site, having been reported as shallow as 0.4-feet below top of casing (btoc), indicating even shallow excavations may encounter groundwater. However, the availability of water in excavations is due not only to groundwater infiltration, but to surface water runoff entering open, unbermed excavations. The SMP must include protocols for dewatering excavations. Revise the SMP to address the effect that weather, e.g. a recent storm event or a concurrent one, in addition to anticipated groundwater levels based on historic data and selecting the size of the excavation dewatering containment vessel(s) for management of the excavation water.

Thank you for your cooperation. 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.

Respectfully,
Keith Nowell

Keith Nowell PG, CHG
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http://www.acgov.org/aceh/lop/ust.htm