YRC Freight 10990 Roe Avenue Overland Park, KS 66211



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By Alameda County Environmental Health at 2:41 pm, Aug 26, 2014

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To Whom it May Concern:

Attached is the "Request for Closure– Well Search" for the former YRC Inc. (formerly known as Roadway Express) d.b.a. YRC Freight, property located at 1708 Wood Street in Oakland, CA 94607, Fuel Leak Case No. R00000039.

I declare, under penalty of perjury, that the information and/or recommendations contained in the attached report are true and correct to the best of my knowledge.

YRC Freight is a subsidiary or YRC Worldwide Inc., as Manager -Environmental Services and Properties of YRC Freight, I have been charged by YRC Worldwide Inc., to represent YRC Freight.

Sincerely,

Ruben Byerley Manager -Environmental Services and Properties August 25, 2014

Keith Nowell Hazardous Materials Specialist Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502-6577

Re: Request for Case Closure – Well Search Former Roadway Express Facility 1708 Wood Street, Oakland, CA GeoTracker ID#: TO600102107 LOP Case #: RO0000039, RB LUSTIS Case #: 01-2291

Dear Mr. Nowell:

On behalf of YRC Worldwide, Inc. (YRC), Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) has completed the well search and receptor survey requested by Alameda County Environmental Health (ACEH) for the Former Roadway Express Facility located at 1708 Wood Street, Oakland, CA (Site) (Fig. 1). Well searches were performed using a 2,000-foot radius from the center of the Site using well records from the Alameda County Public Works Authority (ACPWA) and the California Department of Water Resources (DWR). The results of the well search were tabulated to include the state well ID, well location, distance from the site, well type, and well depth (Table 1). The groundwater wells and sensitive receptors within 2,000 feet of the Site were plotted on an aerial map of the Site (Fig. 2). The well search and sensitive receptor survey were intended to better characterize the northwest area of the Site to obtain closure status.

1.0 JUSTIFICATION OF PLUME LENGTH

The plume length and risk to receptors around the Site were evaluated using the *Technical Justification for Groundwater Plume Lengths, Indicator Constituents, Concentrations, and Buffer Distances* (*Separation Distances*) to Receptors (LTCP Guidance; SWRCB 2012). The most recent monitoring well data included in the Burns & McDonnell 2014 Request for Closure report were analyzed to correlate contaminant concentrations with LTCP Guidance for maximum plume length at the site. Benzene, methyl tert-butyl ether (MTBE), and total petroleum hydrocarbons (TPH) as gasoline range organics (TPHg) were not detected above their respective detection limits of 0.5 ug/L, 0.5 ug/L, and 50 ug/L for all monitoring wells. In all monitoring wells, concentrations of all other VOCs were also below detection limits.

The extremely low (non-detectable) concentrations at the Site support designation of the Site as a LTCP Groundwater Specific Scenario 1. The Site is most accurately classified under Class 1 because the plume is short and stabilized, has no free product, and has a small or depleted source. For this Site, the suspected

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source(s) were "depleted" when the remaining USTs, leaking underground pipe, and impacted soil were excavated by Burns & McDonnell in 2011. Given the non-detectable concentrations of the constituents of concern, the site is expected to have an almost negligible groundwater plume, if any.

2.0 SENSITIVE RECEPTORS

2.1 SURVEY OF SENSITIVE RECEPTORS

The site is surrounded by a combination of commercial and residential sites, and there are three parks and a school within the 2,000 foot radius. There are two open remediation sites, listed in GeoTracker as the Osagie Property (GeoTracker ID T0600191668) and the Grand and Poplar property (GeoTracker ID SL0600117897), which contain monitoring wells that are regularly monitored. These two sites could potentially serve as "sensitive receptors" if there was a plume beneath the YRC Site. However, these two sites could also be a potential source of contaminants to the YRC Site.

Industrial and commercial facilities are located to the southwest, southeast, and north of the site. Residential areas are located to the south and southeast of the site. The west border of the site is near the vacant Oakland Central Station, also known as 16th Street Station, and the northeast border of the site is adjacent to Raimondi Park. Willow Park lies approximately 1,000 feet southwest of the site, and DeFremery Park lies within 2,000 feet to the southeast. Ralph J. Bunche High School lies partially within 2,000 feet of the site.

2.2 SENSITIVE RECEPTORS WITHIN BUFFER DISTANCE

Assuming the maximum Class 1 plume length of 100 feet, receptors within 250 feet of the plume boundary potentially could be at risk in the event of future plume migration. The only receptor within 250 feet of the maximum 100-foot plume length is Raimondi Park, which is believed to use irrigation water from the East Bayshore Recycled Water Project Recycling Plant rather than groundwater (SWRCB 2008). Any migration of a contaminant plume toward this location would have minimal impact, given that the receptor may have no beneficial use for groundwater.

The next-closest receptor is Oakland Central Station, which is currently in disuse except for occasional community events. It has been the center of plans for a future community development project since 2002, but the finished building would use water from the public water system (16th Street Station). Residential areas exist within 350 feet of the site on the south and east sides, but it is believed that these locations use water from the public water system, which is provided to this area by East Bay Municipal Utilities District (EBMUD). Any migration of a contaminant plume toward these locations would have minimal impact, given that neither receptor currently has a beneficial use for groundwater.

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Based on the site conceptual model created by Burns & McDonnell in 2008, the direction of groundwater flow is east and northeast. Potential migration of the plume would be expected to occur in the eastern direction, which would not impact Oakland Central Station and would primarily impact the southeast corner of Raimondi Park's subsurface.

3.0 NEARBY WELLS

A search of the DWR online Water Data Library (http://www.water.ca.gov/waterdatalibrary/) was performed, and no public supply wells regulated by the California Department of Public Health (CDPH) were found within 2,000 feet of the Site. Using the well data compiled from ACPWA and DWR records in Table 1, ten monitoring wells at four different sites were found within 1,000 feet of the site, and 50 monitoring wells at 14 different sites were found to be within 2,000 feet of the site. All of the wells within 2,000 feet of the site are monitoring wells except for one industrial well. Based on their shallow depths and their associations with other UST cleanup sites, the monitoring wells are not used for supplying water for sensitive uses such as drinking or irrigation. Based on its relatively shallow 200-foot depth and industrial designation, and the fact that this well is not on the CDPH database of public water supply wells, from the industrial well is not likely used for public water supply. These wells would not be impacted significantly by plume migration because they are further away from the site than the 250-foot buffer distance that is recommended in the LTCP Guidance.

4.0 CONCLUSION

The LTCP Guidance maximums for Class 1 plume lengths and receptor buffer distances have assisted Burns & McDonnell in more fully characterizing the Site with conservative estimates of affected receptors. Raimondi Park and Oakland Central Station are the only potential receptors within 250 feet of the estimated maximum plume length of 100 feet, and their water usage would not likely be affected by a the potential migration, if any, of groundwater from any subsurface plume.

There are no public supply wells regulated by the CDPH near the Site. No domestic wells have been identified. Shallow groundwater is not currently being used as a source of drinking water. Water is provided to water users near the Site by the EBMUD. It is highly unlikely that any groundwater that may potentially be impacted will be used as a source of drinking water or other beneficial use in the foreseeable future.

The petroleum release is limited to the shallow soil and groundwater in the immediate vicinity of the former tanks. Any residual impact appears to be laterally limited by biodegradation, as all monitoring well concentrations are below detection limits for constituents of concern. Subsurface conditions indicate no mechanism for petroleum transport vertically due to the presence of the low-permeability Bay Mud. The low permeability of the upper groundwater zone clay soil in the immediate area will act as an inhibitor to horizontal petroleum transport. The affected groundwater is not currently being used as a source of drinking water or for any other beneficial use, and it is highly unlikely that the affected

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groundwater will be used as a source of drinking water or for any other beneficial use in the foreseeable future. Public supply wells are constructed with competent sanitary seals and intake screens that are generally in deeper, more permeable and more protected aquifers.

Other designated beneficial uses of impacted groundwater are not threatened. Remaining petroleum hydrocarbon constituents are limited, stable, and declining in concentration to non-detectable levels. Remedial actions have been implemented and further remediation would be ineffective and expensive. Additional assessment/monitoring will not likely change the conceptual model. Any remaining petroleum hydrocarbon constituents do not pose significant risk to human health, safety or the environment. The corrective action performed is protective of human health, safety, and the environment.

Burns & McDonnell reiterates the request for closure made in the 2014 *Request for Closure* report. The Site has been characterized, the plume source and secondary source(s) removed, and NFA status is warranted.

If you have any questions or comments regarding the well search results or sensitive receptor evaluation for the YRC Freight, Inc. facility located at 1708 Wood Street, Oakland, CA, please contact Chris D'Sa, Project Manager (310) 570-7069.

Sincerely,

Anne McPeters Staff Engineer

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Galen Kenoyer PhD P.G Principal Geologist



cc: Ruben Byerley, YRC Martin Ward, PSAI Realty Partners

Attachments:

- Figures
- Figure 1: Site Location
- Figure 2: Wells and Receptors Within 2,000-foot Radius of Site
- Table 1: Well Search Results



REFERENCES

- ACC Environmental Consultants. 2013. *Phase II ESA Limited Soil and Groundwater Investigation*, October 15, 2013.
- BRIDGE Housing, 16th Street Station, <16thstreetstation.com>. Retrieved August 11, 2014.
- Burns & McDonnell Engineering Company, Inc., 2008, Additional Site Assessment Report, September 5, 2008.
- Burns & McDonnell Engineering Company, Inc., 2011, Underground Storage Tank and Oil Water Separator Removal Report. March 2012.
- Burns & McDonnell Engineering Company, Inc., 2014, Request for Closure Site Conceptual Model, February 28, 2014.
- California Regional Water Quality Control Board San Francisco Bay Region, 2008, *Executive Officer's Report, A Monthly Report to the Board and Public* http://www.waterboards.ca.gov/rwqcb2/board_info/agendas/2008/june/eoreport.pdf
- State Water Resources Control Board (SWRCB), 2012, Technical Justification for Groundwater Plume Lengths, Indicator Constituents, Concentrations, and Buffer Distances (Separation Distances) to Receptors.

FIGURES





SITE MAP, dwholder 8/25/2014

TABLES

STATE OF CALIFORNIA DWR WELL COMPLETION REPORT (WELL LOGS)

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