

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
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April 2, 2008

Mr. Denis Brown
Shell Oil Products US
20945 S. Wilmington Ave.
Carson, CA 90810-1039

Mr. Bob Farrell
Bob Farrell Shell
1285 Bancroft Avenue
San Leandro, CA 94577

Subject: Fuel Leak Case No. RO0000156 and Geotracker Global ID T0600101224, Shell#13-6017, 1285 Bancroft Avenue, San Leandro, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted reports entitled, "*Subsurface Investigation Report*," dated February 6, 2008 and "*Groundwater Monitoring Report – Fourth Quarter 2007 and Request for Extension*," dated January 31, 2008. The "*Subsurface Investigation Report*," presents the results from soil and groundwater sampling conducted in November 2007. Four cone penetration testing (CPT) borings were advanced as planned; however, only one of four proposed soil borings was completed.

Elevated concentrations of fuel hydrocarbons continue to be detected in groundwater within the area southwest of the USTs and the former dispenser area. The persistent detection of elevated concentrations of TPHg, MTBE, and TBA indicate that a significant source of residual contamination remains in this area of the site. The three proposed soil borings that were not completed were in this area of the site and were intended to delineate shallow soil contamination in the area of the tank pit and to provide data for an evaluation of the rate of degradation of petroleum hydrocarbons in deeper soils.

We concur with the recommendation to decommission monitoring well MW-3 due to the potential for cross contamination of different water-bearing zones. In addition, we request that three additional wells with similar construction also be decommissioned. We request that you prepare a work plan that addresses the following technical comments.

TECHNICAL COMMENTS

1. **Potential Cross Contamination.** We concur with the recommendation to decommission long screen well MW-3 because it is screened across more than one coarse-grained layer. The CPT data indicate that the stratigraphy is relatively consistent across the site. Wells MW-1, MW-2, and MW-4 have 20-foot screen lengths and also appear to be screened across more than one coarse-grained layer. Therefore, we request that you prepare a work plan for decommissioning wells MW-1, MW-2, MW-3, and MW-4. The work plan is also to include plans for well replacement. Additional wells are to be proposed to adequately monitor water quality in the first water-bearing layer and the continuous coarse-grained layer typically encountered approximately 50 feet bgs downgradient from the tank pit.

2. **Hydrographs.** In order to help assess possible ambient flow and cross contamination between water-bearing layers in the existing long screen wells, we request that you plot existing groundwater elevation data on one or more hydrographs. Please present the hydrograph(s) in the Work Plan requested below.
3. **Soil Vapor.** A soil vapor survey was conducted on the adjacent property to the west in June 2000. However, the methods use or collection of soil vapor samples is not described. During the June 2000 soil vapor sampling, total petroleum hydrocarbons (C5+ range) were detected in soil vapor samples collected at 5 feet bgs at concentrations up to 12 micrograms per liter. No soil vapor samples appear to have been collected on site. We request that you propose additional soil vapor sampling on site and to confirm previous off-site results. Please include plans for soil vapor sampling in the Work Plan requested below.
4. **VOC Analysis.** Based on the groundwater monitoring results to date, ongoing analysis for chlorinated solvents is not required during quarterly groundwater monitoring.
5. **Quarterly Groundwater Monitoring.** Please continue quarterly groundwater monitoring for the site and present the results in the Quarterly Monitoring Reports requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **June 13, 2008 – Work Plan**
- **30 days following the end of each quarter – Quarterly Monitoring Report**

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) now 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.

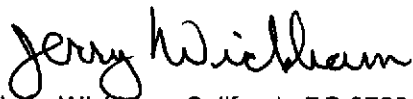
AGENCY OVERSIGHT

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.

Denis Brown
RO0156
April 2, 2008
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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ana Friel, Conestoga-Rovers & Associates, 19449 Riverside Drive, Suite 230
Sonoma, CA 95476

Peter Schaefer, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A
Emeryville, CA 94608

John Camp, City of San Leandro, Environmental Services Division, Civic Center
835 East 14th Street, San Leandro, CA 94577

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
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 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)