

Jurek, Anne, Env. Health

From: Jurek, Anne, Env. Health
Sent: Monday, August 08, 2016 5:27 PM
To: 'andrea.wing@shell.com'; 'sunny@vintnersdist.com'
Cc: 'Heikkila, Sara'; 'rachel.sultan@aecom.com'; 'Aubrey.Cool@aecom.com'; 'jeff.bullen@shell.com'; 'mark.williams@us.bureauveritas.com'; John Ellis; Roe, Dilan, Env. Health
Subject: Fuel Leak Case No. RO0000254 and GeoTracker Global ID T0600101231, Shell # 13-5266, 1800 Powell Street, Emeryville, CA 94608

Dear Ms. Wing and Mr. Goyal:

Thank you for meeting with Alameda County Department of Environmental Health (ACDEH) on July 28, 2016 to discuss the above referenced fuel leak case. The case concerns two unauthorized releases: 1) the release in September 1982 of 3,200 gallons of super unleaded gasoline due to a leak from damaged fiberglass piping connected to an underground storage tank (UST) that occurred during Shell Oil Products US's ownership of the site; and 2) the release of diesel in September 2013 due to a product rupture that occurred during on-site investigative drilling that was conducted by the current property owner, Au Energy LLC.

Investigation of the September 1982 release was performed until 2015 on the behalf of Shell. Investigation and excavation of the September 2013 release on behalf of Au Energy was performed between September 30, 2013 and June 16, 2014. Although both Shell and Au Energy are responsible parties (RPs) for the 1982 fuel leak, Au Energy is the primary/active RP for the 2013 diesel release, as Shell was not the property owner, tank owner, or tank operator at the time of the release.

During our meeting, representatives from Shell stated their belief that all criteria for the State Water Resources Control Board's (State Water Board) Low-Threat Underground Storage Tank Case Closure Policy (LTCP) have been met by Shell for the 1982 release. Representatives for Au Energy stated their belief that soil contaminated from the 2013 diesel release has been excavated as much as was feasible given the extent of the landfill subsurface material and believe that residual TPH may be due to historical industrial waste debris. They also stated that further downgradient characterization of the diesel release is impeded due to the following: 1) extensive utility lines at Powell Street; and 2) inability to install any monitoring wells downgradient due to the California Coastal Commission and the East Bay Regional Park District (EBRPD) not granting permission for access to EBRPD land that is adjacent south of Powell.

Based on our review of the case file and our discussion during the meeting, ACDEH requests the following from each RP in order for us to determine the next course of action:

Shell Oil Products US:

A compilation of the following information pertaining to the 1982 release and the 2004 piping and dispenser upgrade:

Tables that summarize historical analytical data for soil, grab groundwater, and groundwater from monitoring wells. Of note, although groundwater monitoring analytical data is documented in previous reports to have begun on October 24, 1984, the most recent groundwater monitoring report, "Groundwater Monitoring Report- First Quarter 2015," dated April 27, 2015 and prepared by Conestoga-Rovers and Associates, includes historical groundwater analytical data between October 27, 1988 to February 27, 2015. Please include all monitoring well analytical data.

All boring logs for all borings advanced and well construction details for monitoring wells.

Figures delineating the extent of the remaining gasoline and diesel plumes both before and after the 2013 diesel release, which include rose diagrams for groundwater flow direction.

A discussion of historical plume migration of total petroleum hydrocarbons as gasoline (TPH-g) and as diesel (TPH-d).

Hydrographs of water levels and contaminant concentration trends based on monitoring well data.

A review the analytical records of your reports to confirm whether or not naphthalene was analyzed in groundwater and soil. In our review of the case file, including laboratory analytical results, it did not appear that naphthalene was tested in any media except for soil samples collected in 1996, as documented in the report by Weiss Associates entitled "Subsurface Investigation Report" dated August 14, 1996.

A complete map of the utility lines at the site and at Powell Street, including the utility locations identified and discussed in the report by Conestoga-Rovers and Associates entitled, "Attempted Well Reinstallation," dated January 13, 2012. Include all storm drains and outfalls from the site.

Cross-sections that show borings, wells, any excavation, fill, etc.

Verification as to whether or not there were previous generations of tanks at the site.

A discussion of how much residual TPH is due to the 1982 release as compared to historical industrial waste debris at the site.

A discussion comparing current site conditions to LTCP criteria.

Technical Report Request

Please upload technical reports to the ACDEH ftp site (Attention: Anne Jurek), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- September 16, 2016 – Status Report
- File to be named: STAT_R_YYYY-mm-dd RO254

In addition, the 2006 work plan completed by Cambria for installing monitoring wells S-15 and S-16 on the property south of Powell Street is not on file on ACDEH's ftp and the State Water Board's GeoTracker. In addition, all site maps and boring logs have not uploaded onto GeoTracker. Please upload this data, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1.

Au Energy LLC:

A compilation of the following information pertaining to the 2013 release and the 2014 redevelopment:

A complete timeline and discussion of investigation and remediation.

A figures of boring and sampling locations which includes the locations of the current USTs that were installed during May and June 2014 in relation to the former USTs.

Tables of all soil analytical results, including those collected during due diligence when the property was purchased to establish baseline conditions. Of note, a table and a laboratory report of the analytical results for samples collected at borings BV-1 through BV-4 that were advanced on September 30, 2013, are not in our case file.

A table of separate phase hydrocarbon (SPH) measurements that were collected using an oil/water separator probe from the UST backfill observation wells in October 2013.

Waste manifests for the 5,000 gallons of water/SPH mixture removed from the UST backfill area for offsite disposal.

A table of groundwater monitoring measurements for SPH taken on October 2,3,4,7,9,15, and 23, 2013, and weekly groundwater monitoring of measureable SPH for monitoring wells S-8, S-10, and S-13. This work is discussed in "Work Plan for Subsurface Investigation at Shell-Branded Gasoline Station," dated October 31,2013, and prepared by Bureau Veritas North America, Inc. (BVNA) but there are not associated tables.

Boring logs for all borings advanced.

Cross-sections that show borings, wells, any excavation, fill, etc.

A discussion of the extent of diesel contamination from the 2013 spill, including a figure delineating the extent of the plume from the remaining diesel.

A discussion of how much residual TPH is due to the 2013 release as compared to historical industrial waste debris at the site.

A discussion comparing current site conditions to LTCP criteria.

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In addition, please upload all documents related to the State Water Board's GeoTracker website including reports, borehole logs, site map, and analytical data (EDF format), and photos pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895. Details of the submission requirements are discussed in the attachments.

I will be sending out a separate emails by next week to coordinate a tentative meeting date between September 12 and September 23, 2016.

If you have any concerns or questions, please contact me. Thank you.

Sincerely,

Anne Jurek, M.S.

Professional Technical Specialist II (Geology)

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