



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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January 8, 2009

Paul Supple
Atlantic Richfield Company
(A BP Affiliated Company)
P.O. Box 1257
San Ramon, CA 94583

Mirazim & Afsar Shakoori
Former Castro Valley Chevron
3519 Castro Valley Boulevard
Castro Valley, CA 94546

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

Subject: Fuel Leak Case No. RO0000346 and GeoTracker Global ID T0600100920, BP #11105 /
Shell 17-1445, 3519 Castro Valley Boulevard, Castro Valley, CA 94546

Dear Mr. Supple, Mr. and Mrs. Shakoori, and Ms. Campagna:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Fourth Quarter 2008 Groundwater Monitoring Report," dated November 17, 2008, which was prepared by SOMA Environmental Engineering, Inc. for the subject site. Due to decreasing concentrations of contaminants detected in groundwater samples collected from the site, SOMA recommends "[a]doption of No Further Action (NFA) status for the site...." Although concentrations of contaminants appear to exhibit a decreasing trend, there appears to be potential data gaps at the site that need to be addressed prior to case closure consideration.

ACEH requests that you address the following technical comments and send us the technical work and reports requested below.

TECHNICAL COMMENTS

1. **Monitoring Wells and Hydrogeologic Setting** – Depth to groundwater at the site is typically measured at approximately 10 feet below the groundwater surface (bgs). Groundwater monitoring wells MW-1 and MW-2 have screened intervals from 10 to 30 feet bgs, MW-5 has a screened interval from 9 to 24 feet bgs, MW-8 has a screened interval from 9 to 20 feet bgs, and SOMA-3 has a screened interval from 10 to 15 feet bgs. Groundwater monitoring wells MW-6 and MW-7 have screened intervals from 18 to 30 feet bgs, SOMA-1 has a screened interval from 22 to 30 feet bgs, and SOMA-2 and SOMA-4 have screened intervals from 16 to 23 feet bgs. Since groundwater elevation is above the screened intervals for monitoring wells MW-6, MW-7, SOMA-1, SOMA-2, and SOMA-4, and petroleum hydrocarbons have a specific gravity that is lower than water (therefore, float on water); concentrations of contaminants detected may not be representative of actual site conditions. Therefore, the monitoring well network does appear to adequately evaluate the water bearing zone(s) that may be present at the site, which may affect currently known site conditions.

Please evaluate and discuss the effect that groundwater elevations rising above monitoring well screened intervals have on hydrocarbon concentrations for each monitoring well at the site. Please address the above-mentioned concerns and include your analysis in the Site Conceptual Model (SCM) and data gap work plan requested below.

2. **Soil and Groundwater Characterization** – Shell Oil Products US submitted an Unauthorized Release Form dated September 24, 2008, which cited TPH-g concentrations detected at 720 mg/kg in soil and 900 µg/L in groundwater. However, a summary report and/or figures illustrating the sampling location(s) were not found in our files. Prior to case closure consideration, the extent of the unauthorized release and its impact to soil and groundwater must be characterized. Please propose a scope of work to address the above-mentioned concerns and include it in the data gap work plan due by the date specified below. Also please submit a sampling summary report detailing the sampling activities that prompted the Unauthorized Release Form submittal, due by the date specified below.
3. **Site Conceptual Model** – Above are two examples of potential data gaps identified at the site during our case review. Therefore, at this time, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:
 - (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
 - (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
 - (3) Plots of chemical concentrations versus time;
 - (4) Plots of chemical concentrations versus distance from the source;
 - (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor);
 - (6) Well logs, boring logs, and well survey maps; and
 - (7) Discussion of likely contaminant fate and transport.

If additional data gaps (i.e. potential contaminant volatilization to indoor air since benzene was detected in soil at a concentration of 1.4 mg/kg in boring ESE-3.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in this correspondence and all data gaps identified in the SCM.

4. **Groundwater Contaminant Plume Monitoring** – Quarterly groundwater sampling is currently being conducted at the site. Since many quarters of groundwater analytical data exists, your consultant may propose and justify an alternate groundwater monitoring plan for

review (i.e. semi-annual sampling, etc.). This may be incorporated into the above requested SCM and data gap work plan due by the date specified below.

REQUEST FOR INFORMATION

ACEH's case file for the subject site contains the following electronic reports as listed on our website (<http://www.acgov.org/aceh/lop/ust.htm>). You are requested to submit copies of all other reports related to environmental investigations for this property (including Phase I and Phase II reports) by **February 5, 2009**.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **January 30, 2009** – Quarterly Monitoring Report (4th Quarter 2008)
- **March 9, 2009** – SCM & Data Gap Work plan
- **April 30, 2009** – Quarterly Monitoring Report (1st Quarter 2009) Tentative due date, subject to change based on pending Groundwater Monitoring Plan
- **July 30, 2009** – Quarterly Monitoring Report (2nd Quarter 2009) Tentative due date, subject to change based on pending Groundwater Monitoring Plan
- **October 30, 2009** – Quarterly Monitoring Report (3rd Quarter 2009) Tentative due date, subject to change based on pending Groundwater Monitoring Plan

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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

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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.

Sincerely,



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A,
Pleasanton, CA 94588
Matthew Herrick, Broadbent & Associates, Inc., 2000 Kirman Avenue, Reno, NV 89502
Kevin McCarthy, Delta Environmental Consultants, 4640 SW Macadam Avenue, Suite 110,
Portland, OR 97239-4283
Donna Drogos, ACEH
Paresh Khatri, 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)