



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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March 27, 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 Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Site Conceptual Model and Workplan to Address Data Gaps," dated March 9, 2009, which was prepared by SOMA Environmental Engineering, Inc. (SOMA) for the subject site. SOMA proposes to install nine direct push borings to collect soil and groundwater samples to address data gaps identified in the Site Conceptual Model (SCM). Five borings are proposed on the western property boundary to further define the lateral extent of on-site contamination as well as determine whether the hydrocarbon contaminant plume from the station located on the west side of the Redwood Road is impacting the subject site, one boring is proposed between the new USTs and the station building, and three borings are proposed to delineate contamination detected at boring B-3.

ACEH conceptually concurs with the proposed scope of work, but requests that you address the following technical comments and send us work plan addendum described below.

#### **TECHNICAL COMMENTS**

1. **Western Property Boundary & Current USTs** – SOMA states at that "[t]he extent of off-site migration of the MtBE/TBA plume, as well as the origin of the TPH-g contamination along the western border of the property is not fully delineated and represents a current data gap." SOMA also identifies the lack of characterization in the vicinity of boring B-1 as a current data gap. As mentioned above, a total of five borings (DP-1, DP-2, DP-4, DP-5, and DP-6) are proposed to be installed in the western property boundary to address this data gap. Although there appears to be a valid data gap, the five borings proposed may be excessive. Considering that monitoring well ESE-5 is located in the vicinity of proposed borings DP-4, DP-5, and DP-6, the data may not provide any additional utility. It appears the borings DP-1, DP-2, DP-6 may provide the most utility in addressing the apparent data gaps and ACEH

recommends eliminating borings DP-4 and DP-5. Please address the above-mentioned concerns and submit a work plan addendum due by the date specified below.

2. **Monitoring Wells and Hydrogeologic Setting** – ACEH identified in our January 8, 2009 correspondence that many groundwater monitoring wells at the site have submerged screened intervals and some wells have excessively lengthy screened intervals. ACEH requested that the effect that groundwater elevations rising above monitoring well screened intervals have on hydrocarbon concentrations for each monitoring well at the site be evaluated. SOMA states that “[a]n 18 to 22 foot thick bed of confining silty clay and clayey silt overlies the WBZ” and that “initial groundwater was encountered at depths of 18 to 25 feet bgs. Depth to stabilized groundwater in the monitoring wells has historically ranged between 2.36 feet to 12.02 feet bgs.” SOMA concluded that “...the WBZ is considered a semi-confined to confined aquifer and the wells on- and off-site appear to be screened appropriately within the First WBZ.”

ACEH disagrees with SOMA's conclusions regarding the appropriateness of the groundwater monitoring wells at the site. If groundwater conditions are semi-confined to confined, then some of the monitoring wells would be screened through the confining unit. The excessively long well screened intervals would allow potentially clean groundwater to come into contact with hydrocarbon impacted soil in the vadose zone and introduce contamination to the water-bearing zone. Conversely, if groundwater conditions are unconfined, the concentrations of contaminants detected in groundwater may not be representative of actual site conditions in monitoring wells with excessively long screened intervals since the concentrations of contaminants detected may be diluted. Therefore, determining whether the groundwater is semi-confined to confined or unconfined appears to be a valid data gap. At this time, please propose a scope of work to address the above-mentioned concerns and submit a work plan addendum due by the date specified below. It may be advantageous to install a shallow well in the vadose zone, (within the confining unit and above the water-bearing permeable zone), and screened through the potentiometric surface. Preferably, this well should be located next to an existing well at the site. This data may aid in determine hydrogeologic characteristics at the site.

#### **TECHNICAL REPORT REQUEST**

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

- **May 26, 2009** – Soil and Water Investigation Work Plan Addendum

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](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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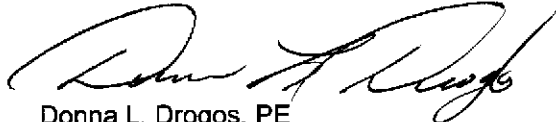
Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto: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  
Donna Drogos, ACEH  
Paresh Khatri, ACEH  
GeoTracker  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> March 27, 2009
	<b>PREVIOUS REVISIONS:</b> December 16, 2005, October 31, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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](mailto:dehloptoxic@acgov.org)  
Or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
  - 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](mailto: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 @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) If site is a new case without an RO# use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.