

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 31, 2009

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

Mr. Frank Salel
Salel Enterprises
P.O. Box 5099
Oakland, CA 94605

Subject: Fuel Leak Case No. RO0000372 and Geotracker Global ID T0600101226,
Shell#129460, 15275 Washington Avenue, San Leandro, CA 94579

Dear Mr. Brown and Mr. Salel:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted work plans entitled, "*Soil Vapor Extraction Pilot Test Work Plan, Former Shell-Branded Service Station, 15275 Washington Avenue, San Leandro, California,*" dated January 27, 2009 and "*Groundwater Sampling Work Plan, Former Shell-Branded Service Station, 15275 Washington Avenue, San Leandro, California,*" dated January 27, 2009. Both work plans, which were prepared on Shell's behalf by Delta Environmental, were received on the ACEH ftp site on March 17, 2009. The "*Soil Vapor Extraction Pilot Test Work Plan,*" proposes the installation of two horizontal soil vapor extraction (SVE) wells for the purpose of conducting a SVE pilot test. We concur with the proposal to conduct a step test and extended test; however, we request some modifications to the pilot test as described in the technical comments below. Therefore, we request that you address the technical comments below and prepare a Revised SVE Pilot Test Work Plan.

The proposed groundwater sampling in the "*Groundwater Sampling Work Plan,*" may be implemented provided that technical comment 5 below is addressed during field implementation. Please see technical comment 5 below regarding the selected wells in which to implement both purge and no purge sampling.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Horizontal Well Locations.** In general, the highest concentrations of TPH as gasoline and benzene have been detected in soil vapor samples collected in the central and western portions of the site. Elevated concentrations of TPH as gasoline and benzene have also been detected in soil vapor off-site to the west. For the pilot test, two horizontal wells (ET-1 and ET-2) are proposed in the central portion of the site aligned parallel to the eastern edge of the former service station building. The former SVE system that operated on site from May 1998 to October 1999, also included horizontal piping for SVE (see attached Figures A-1 and C-1 from the "*Remediation System Design*," dated March 25, 1998) that apparently ran along the east, west, and south sides of the current building. The aboveground system was removed in 2002; however, we did not find documentation to indicate that the below ground piping was removed. Therefore, it is possible that the horizontal piping remains in place. The currently proposed location of ET-2 appears to be close to the location of the horizontal piping used for the previous SVE system. We request that you review the proposed locations of ET-1 and ET-2 in relation to the former system and propose revised locations as necessary. We recommend that ET-1 be moved further to the west, closer to the locations of 2008 soil vapor sampling locations P-21 and P-23 north of the current building. Please also review the proposed location of well ET-2. Specifically, please consider the proximity of ET-2 to the horizontal SVE piping from the former system and possible effects on SVE pilot test results. Please present revised locations for the horizontal wells as necessary in the Revised SVE Pilot Test Work Plan requested below.
- 2. Soil Vapor Analyses.** The SVE Work Plan currently proposes to analyze soil vapor samples for BTEX using EPA Method TO-15. Analysis for BTEX using EPA Method 8260 is acceptable and is expected to be more cost effective.
- 3. Observation Wells.** The SVE Work Plan proposes to use wells ET-2, S-1, S-3, S-16, and S-18 as observation wells. We request that you include monitoring of off-site wells S-9 and S19. Please include these revisions and other revisions to the monitoring as necessary based on modified extraction well locations requested in technical comment 1.
- 4. Additional Soil Vapor Samples.** As discussed during a recent meeting on March 12, 2009, we request that you review the site assessment data and propose additional soil vapor sampling as necessary. Please include these plans in the Revised SVE Pilot Test Work Plan requested below.
- 5. Proposed Wells for Purge and No Purge Sampling.** The proposal to conduct both purge and no purge sampling in selected wells to assure that representative samples are being collected is generally acceptable. However, we request that purge and no purge sampling be performed during the third quarter 2009 groundwater sampling event in wells S-3, S-5, S-9, and S-16. The Groundwater Sampling Work Plan proposes purge and no purge sampling for wells S-7, S-8, and S-9. We are not requesting purge and no purge sampling in wells S-7 and S-8 at this time. Please present the results of the purge and no purge sampling in the Semi-Annual Groundwater Monitoring Report – Third Quarter 2009 requested below.

TECHNICAL REPORT REQUEST

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

- **April 21, 2009** – Semi-Annual Groundwater Monitoring Report – First Quarter 2009
- **May 29, 2009** – Revised SVE Pilot Test Work Plan
- **October 31, 2009** – Semi-Annual Groundwater Monitoring Report – Third Quarter 2009

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/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.

Denis Brown
Frank Salel
RO0000088
March 31, 2009
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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

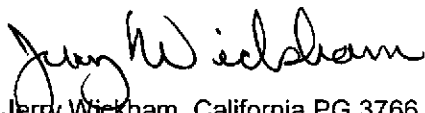
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

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

Attachments: Figures A-1 and C-1 from "*Remediation System Design*," dated March 25, 1998

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Suzanne McClurkin-Nelson, Delta Environmental, 312 Piercy Road, San Jose, CA 95138

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Former Shell Service Station
 15275 Washington Avenue
 San Leandro, California

Site Plan and System Layout

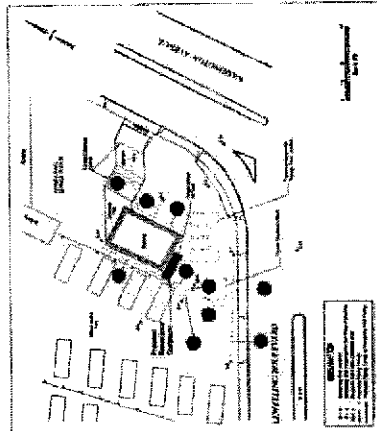
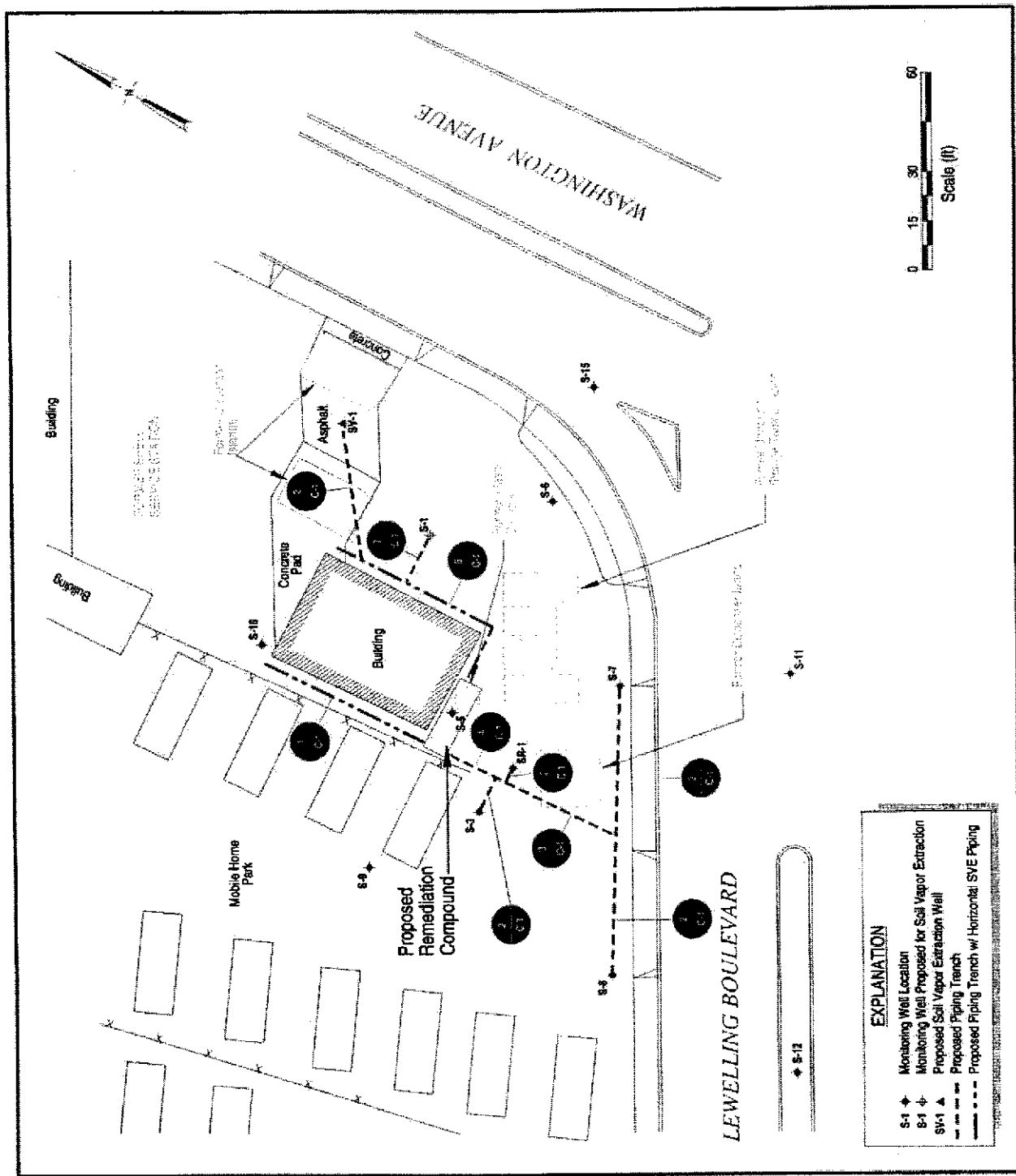


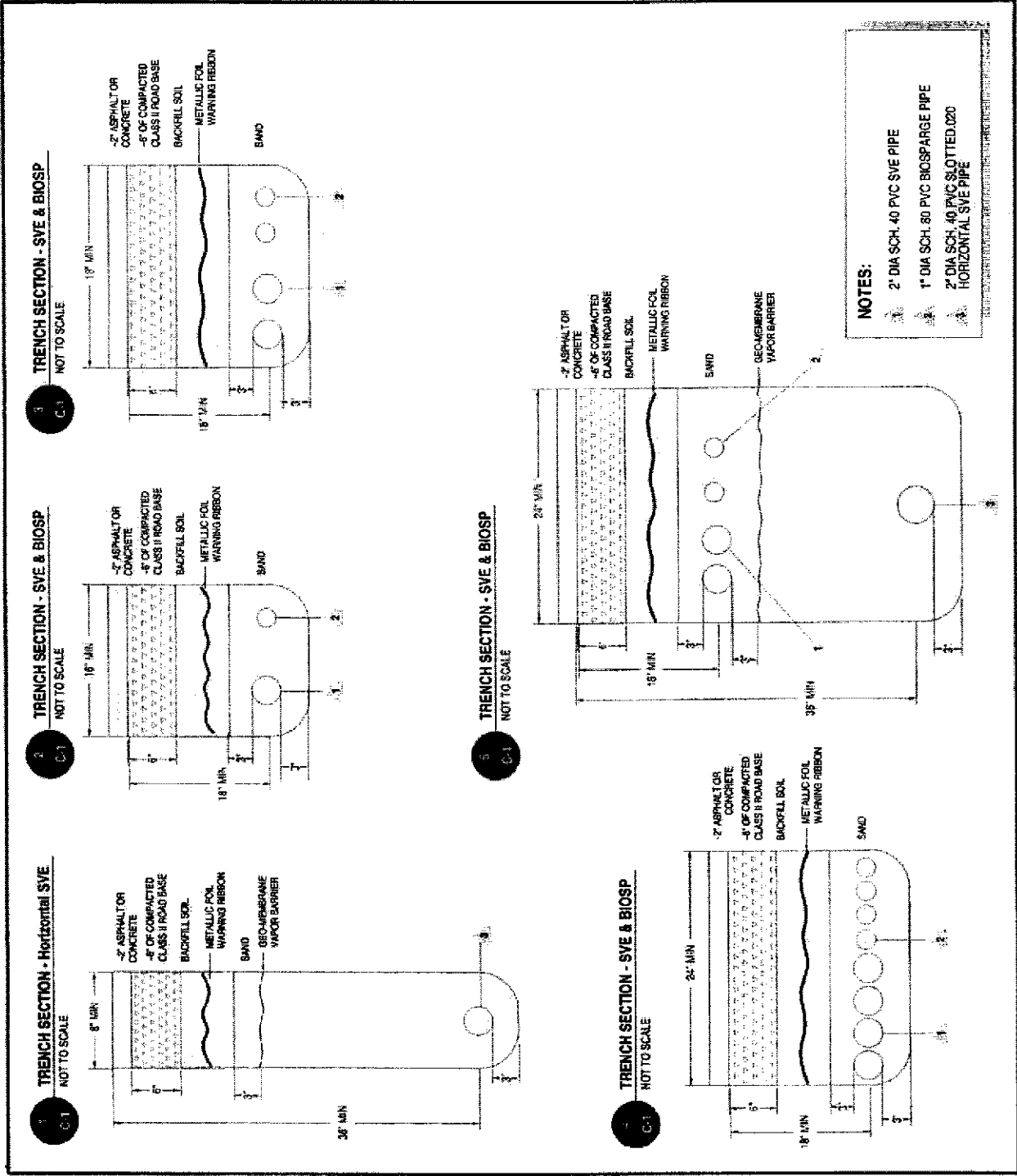
FIGURE A-1



EXPLANATION	
S-1	Monitoring Well Location
S-1	Monitoring Well Proposed for Soil Vapor Extraction
SV-1	Proposed Soil Vapor Extraction Well
---	Proposed Piping Trench
---	Proposed Piping Trench w/ Horizontal SVE Piping

Former Shell Service Station
 15275 Washington Avenue
 San Leandro, California

Trench Sections



NOTES:

- 1. 2" DIA SCH. 40 PVC SVE PIPE
- 2. 1" DIA SCH. 80 PVC BIOSORGE PIPE
- 3. 2" DIA SCH. 40 PVC SLOTTED Ø20 HORIZONTAL SVE PIPE

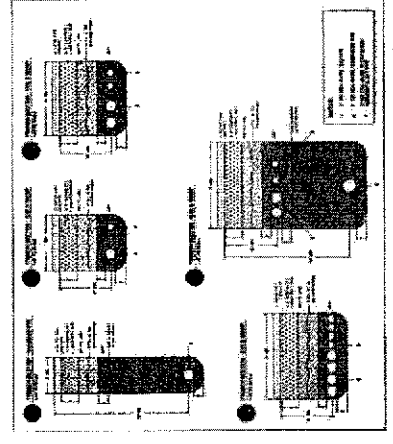


FIGURE C-1

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)