PACIFIC
CONVENIENCE & FUELS LLC

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March 16, 2010

Mr. Paresh Khatri
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Subject: **Work Plan Addendum – Additional Site Investigation**

Site: **76 Station No. 5748/6419**
6401 Dublin Boulevard
Dublin, California
Fuel Leak Case No. RO0000459

Dear Mr. Khatri;

I declare under penalty of perjury that to the best of my knowledge the information and/or recommendations contained in the attached report is/are true and correct.

If you have any questions or need additional information, please call:

Liz Bermudez
Pacific Convenience & Fuel
2603 Camino Ramon, Suite 350
San Ramon, California 94583
Tel: (925) 884-0860
Fax: (925) 867-4687
lbermudez@pcandf.com

Sincerely,

PACIFIC CONVENIENCE & FUEL

Liz Bermudez

LIZ BERMUDEZ
Senior Paralegal

Attachment

March 15, 2010

Mr. Paresh Khatri
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RE: Work Plan Addendum – Additional Site Investigation
76 Station No. 5748/6419
6401 Dublin Boulevard
Dublin, California
Fuel Leak Case No. RO0000459

DELTA

Dear Mr. Khatri:

Delta Consultants (Delta), has prepared this work plan addendum for additional site investigation as requested in a letter from the Alameda County Health Care Services Agency (ACHCSA) dated February 10, 2010. Delta is proposing the advancement of three cone penetration test (CPT) borings for the horizontal and vertical assessment of the petroleum hydrocarbon impacted soil and groundwater down-gradient of the site. Two CPT borings will be advanced in the vicinity of former monitoring wells MW-8 and MW-9, down-gradient of monitoring well MW-5, and one CPT boring will be advanced down-gradient of former monitoring well MW-6, in Dublin Boulevard. A copy of the ACHCSA letter is presented as **Attachment A**.

Additionally, Delta is proposing the redevelopment of monitoring well MW-1 to assess if this well can be used or will need to be abandoned and replaced.

Based on the data obtained during previous investigations the soil beneath the site does not appear to be impacted by petroleum hydrocarbons at actionable concentrations. However, the groundwater beneath the site is impacted by petroleum hydrocarbons as indicated by the concentrations previously reported in former monitoring well MW-6 and in current monitoring well MW-5. In addition, to date the deepest boring advanced at the site and down-gradient of the site is 20 feet below ground surface (bgs). Due to the shallow depth of the previous borings, Delta proposes that the CPT borings be advanced to a depth of approximately 40 feet bgs while collecting soil and groundwater samples.

a member of: Inogen Environmental Alliance

11050 White Rock Road Suite 110 Rancho Cordova, California 95670 USA
Phone +1 916.638.2085 / USA Toll Free 800.477.7411
Fax +1 916.638.8385 www.deltaenv.com

SITE DESCRIPTION

The subject site is an active 76 station located on the western corner of Dublin Boulevard and Dougherty Road in Dublin, California. The site is bounded to the south by Dublin Boulevard, to the northeast by Dougherty Road, to the north and west by lots currently under construction. Properties in the immediate site vicinity are commercial, including service stations and retail facilities. The site location is shown on **Figure 1**.

Current aboveground site facilities consist of two fuel dispenser islands, a car wash facility, and a station building/convenience store. Two 12,000-gallon gasoline underground storage tanks (USTs) are located in the common pit, east-southeast of the station building. Site features are shown on **Figure 2**.

SITE BACKGROUND AND ACTIVITY

September 1993: Two 10,000-gallon gasoline USTs, one 55-gallon waste-oil UST, and the associated product piping were removed from the site subsequent to confirmation sampling. Groundwater was observed entering the UST excavation. Total petroleum hydrocarbons as gasoline (TPHg) concentrations in the confirmation soil samples beneath the fuel USTs, fuel dispensers, and the product piping ranged from below the laboratory's indicated reporting limits to 9.7 parts per million (ppm). Petroleum hydrocarbon and volatile organic compounds (VOCs) concentrations in confirmation soil samples beneath the waste-oil UST were below the laboratory's indicated reporting limits to low, and concentrations of metals were considered background levels. Soil sample locations are shown on **Figure 2**.

February 1994: Three on-site monitoring wells (MW-1 through MW-3) were installed. Monitoring well locations are shown on **Figure 2**.

June 1999: Four on-site monitoring wells (MW-4 through MW-7) were installed to a depth of approximately 19 feet below ground surface (bgs). Monitoring well locations are shown on **Figure 2**.

November 1999: A four-inch diameter groundwater observation and extraction well (TPW-1) was installed in the gasoline UST pit backfill to allow purging of methyl tertiary-butyl ether (MTBE) impacted groundwater. The well location is shown on **Figure 2**.

September 2001: Two off-site monitoring wells (MW-8 and MW-9) were installed to a depth of 20 feet bgs. Monitoring well locations are shown on **Figure 2**.

October 2003: Site environmental consulting responsibilities were transferred to TRC.

December 2004: Off-site monitoring wells MW-8 and MW-9 were abandoned due to construction activities planned at those locations by Pin Brothers Fine Homes.

January 12, 2006: On-site monitoring wells MW-2, MW-4, MW-6, and MW-7 were abandoned at the request of the City of Dublin in anticipation of street widening on both Dougherty Road and Dublin Boulevard.

SENSITIVE RECEPTORS

July 3, 2007: TRC completed a sensitive receptor survey for the site. According to California Department of Water Resources (DWR) and the Zone 7 Water Agency records, four water supply wells are located within a one-half mile of the site. Three of the wells were listed by the Zone 7 Water Agency as water supply wells and located approximately 1,940 feet east, 2,175 feet north, and 2,070 feet northwest of the site. One well, listed by the Zone 7 Water Agency, as an abandoned water supply well and is located approximately 2,440 feet west-southwest of the site.

Three surface water bodies were identified within a one-half mile of the site. San Ramon Creek is located approximately 2,145 feet northwest of the site, an unnamed canal is located approximately 625 feet southwest of the site, and the Chabot Canal is located approximately 1,650 feet east of the site.

PROPOSED ACTIVITIES

Permitting, Off-Site Access, Utility Notification, and Borehole Clearance

Before commencing field activities, Delta will prepare a Health and Safety Plan in accordance with state and federal requirements.

Drilling permits will be obtained from the Zone 7 Water Agency. In addition, Delta will attempt to gain off-site access from the neighboring property owner for the advancement of the CPT-1 and CPT-2 borings. Delta will also attempt to obtain an encroachment permit from the City of Dublin for the advancement of the CPT-3 boring, in Dublin Boulevard. The proposed boring locations are shown on **Figure 2**. If off-site access and the encroachment permit cannot be obtained from the neighboring property owner or the City of Dublin, respectively, Delta will discuss options with the ACHCSA.

Prior to drilling, Underground Service Alert (USA) will be notified as required by law and a private utility locator will be employed to clear the proposed boring locations for underground utilities. In addition, an air- or water-knife will be used to clear each boring location to a depth of five feet bgs prior to boring advancement.

Cone Penetration Test Borings

To date, the maximum depth of exploration at this site is approximately 20 feet bgs. Based on available boring logs, soil types beneath the site consist of interbedded silt, clay, and sand. To further assess the horizontal and vertical extent of the petroleum hydrocarbon impact to the soil and the groundwater down-gradient of the site, it is proposed that three CPT borings be advanced at the locations shown on **Figure 2** to a depth of approximately 40 feet bgs.

Soil samples collected from the borings will be logged using the Unified Soil Classification System (USCS) for lithologic interpretation and field screened for the presence of VOCs by headspace analysis using a pre-calibrated PID. A maximum of three soil samples will be collected for analysis from field selected depths from each CPT boring. A chain-of-custody will accompany the samples during transportation to the laboratory. The collected soil samples will be analyzed for TPHg, benzene, toluene, ethylbenzene and total xylenes (BTEX), MTBE, di-isopropyl ether (DIPE), ethyl tertiary-

butyl ether (ETBE), tertiary-amyl-methyl ether (TAME), tertiary-butyl alcohol (TBA), 1,2-dichloroethane (1,2-DCA), ethylene dibromide (EDB), and ethanol by Environmental Protection Method (EPA) Method 8260 and total lead by EPA Method 6010.

Grab groundwater samples will be collected at selected depths based on the encountered lithology. Potential sample depths include but are not limited to 20 feet bgs, 30 feet bgs, and 40 feet bgs. Each grab groundwater sample will be collected from a separate boring in the general vicinity of the original CPT boring location. A chain-of-custody will accompany the samples during transportation to the laboratory. The groundwater samples will be analyzed for TPHg, BTEX, MTBE, DIPE, ETBE, TAME, TBA, 1,2-DCA, EDB, and ethanol by EPA Method 8260.

Non-disposable sampling equipment will be decontaminated between samples in a non-phosphate detergent and double rinsed with potable water. Following sample collection, neat cement grout will be pumped through the push rods as they are extracted from the borehole affecting borehole abandonment.

Redevelopment of Monitoring Well MW-1

Currently the measured depth of monitoring well MW-1 is 9.28 feet below the top of casing (TOC). However, the boring log for this monitoring well indicates that it was constructed to a depth of approximately 19 feet bgs. The boring log also indicates that the screen interval in this monitoring well, when constructed, was from 4 feet bgs to 19 feet bgs. This indicates that currently, two-thirds of the well screen is below the measured depth of the well and likely filled with sediment. Therefore, Delta recommends that this monitoring well be redeveloped by bailing, surging, and pumping in an attempt to remove the sediment that appears to be present in the bottom of this monitoring well. If the sediment in the bottom of this monitoring well cannot be removed during redevelopment, Delta will prepare a work plan, under a separate cover, for the abandonment and replacement of this monitoring well.

Disposal of Drill Cuttings and Wastewater

Drill cuttings and decontamination water generated during investigation activities will be placed into properly labeled 55-gallon Department of Transportation (DOT) approved steel drums and temporarily stored on the station property. Samples of the drill cuttings and decontamination wastewater will be collected, properly labeled and placed on ice for submittal to a California-certified laboratory and will be analyzed for TPHg, BTEX, and MTBE by EPA Method 8260 and total lead by EPA Method 6010. A chain-of-custody will accompany the samples during transportation to the laboratory. Subsequent to receiving the laboratory analytical results, the drummed drill cuttings, and decontamination wastewater will be profiled, transported, and disposed of at an approved facility.

Reporting

Following completion of the field work and receipt of analytical results, a site investigation report will be prepared and submitted within 60 days. The report will present the details of the boring activities, including copies of boring permits, and details of disposal activities and copies of disposal documents, and soil and groundwater, including copies of laboratory reports. In the report, Delta will also provide recommendations for the development of a remedial action plan at the site. Required electronic submittals will be uploaded to the State Geotracker database.

Remarks/Signatures

The recommendations contained in this report represent Delta's professional opinions based upon the currently available information and are arrived at in accordance with currently acceptable professional standards. This report is based upon a specific scope of work requested by the client. The Contract between Delta and its client outlines the scope of work, and only those tasks specifically authorized by that contract or outlined in this report will be performed. This report is intended only for the use of Delta's Client and anyone else specifically listed on this report. Delta will not and cannot be liable for unauthorized reliance by any other third party. Other than as contained in this paragraph, Delta makes no express or implied warranty as to the contents of this report.

If you have any questions regarding this project, please contact Dennis Dettloff at (916) 503-1261.

Sincerely,
DELTA CONSULTANTS

Dennis S. Dettloff

Dennis S. Dettloff, P.G.
Senior Project Manger
California Registered Professional Geologist No. 7480

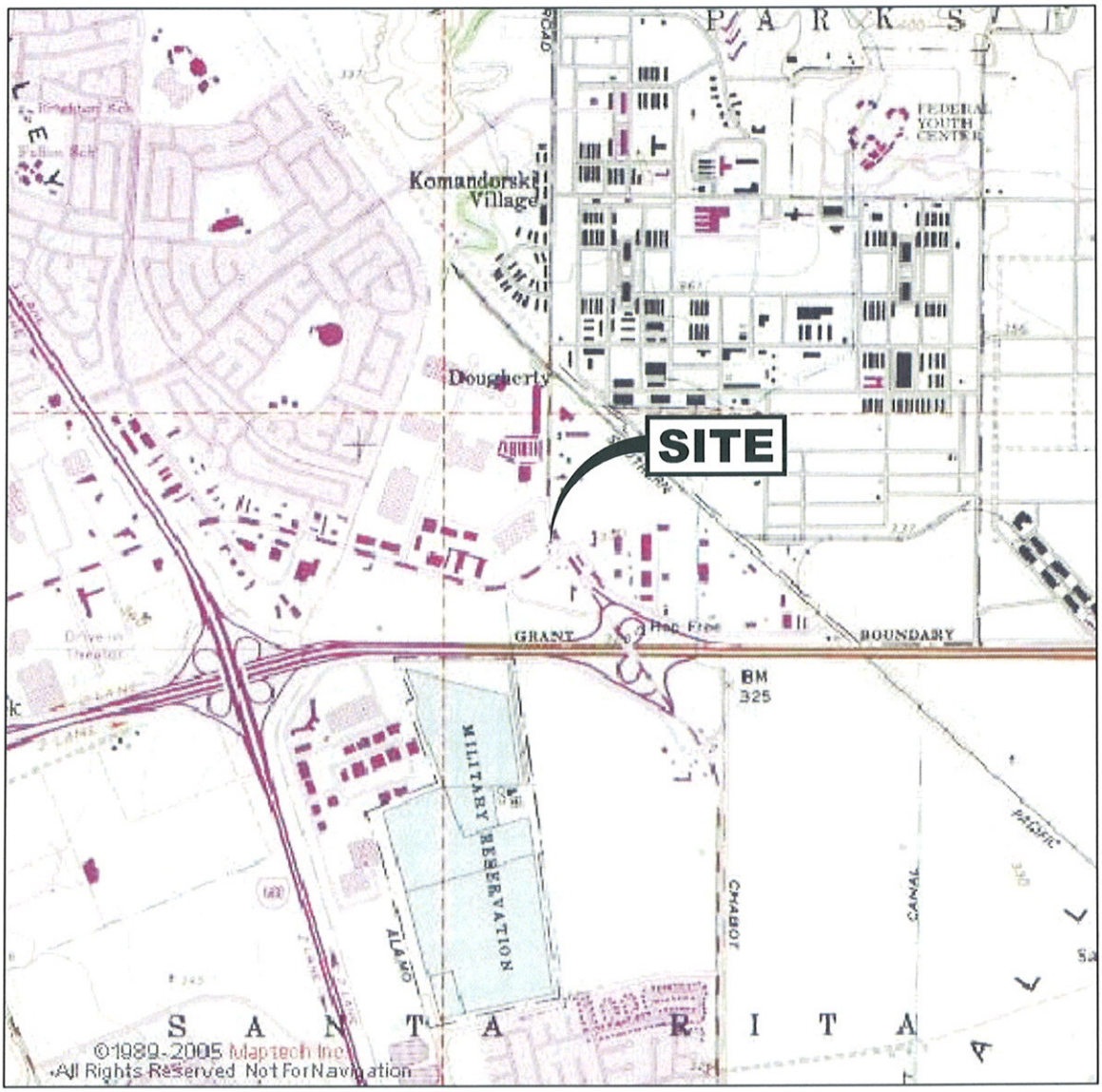
Figures

Figure 1 - Site Location Map
Figure 2 - Site Plan

Attachment

Attachment A - ACHCSA Letter dated February 10, 2010

Figures



North

0 900 1800 FT

SCALE

SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP, DUBLIN (1998) QUADRANGLE

FIGURE 1

SITE LOCATION MAP

76 STATION NO. 5748 / 6419
6401 DUBLIN BOULEVARD
DUBLIN, CALIFORNIA

PROJECT NO. C105748	DRAWN BY DR/JH 03/12/10
FILE NO. 5748-SiteLocator	PREPARED BY JH
REVISION NO.	REVIEWED BY DD

DELTA®

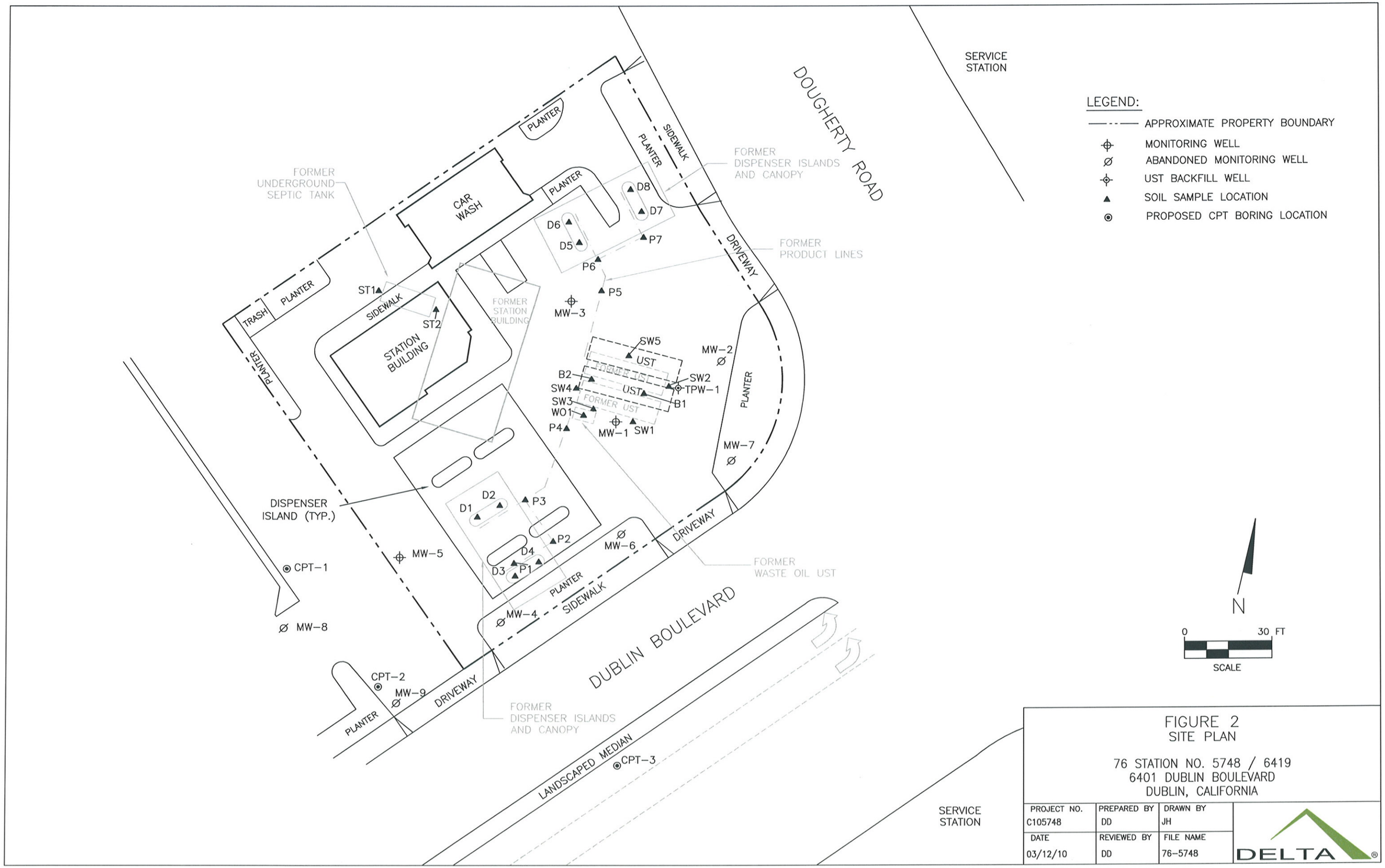


FIGURE 2
SITE PLAN

76 STATION NO. 5748 / 6419
6401 DUBLIN BOULEVARD
DUBLIN, CALIFORNIA

PROJECT NO.	PREPARED BY	DRAWN BY
C105748	DD	JH
DATE	REVIEWED BY	FILE NAME
03/12/10	DD	76-5748

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Attachment A

ACHCSA Letter
Dated
February 10, 2010

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

February 10, 2010

Terry Grayson (*Sent via E-mail to: Terry.L.Grayson@contractor.conocophillips.com*)
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Subject: Fuel Leak Case No. RO0000459 and GeoTracker Global ID T0600101443, UNOCAL #6419, 6401 Dublin Boulevard, Dublin, CA 94568

Dear Mr. Grayson:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Work Plan for Delineation of Vertical and Lateral Extent of Contamination Plume, Addendum," dated November 9, 2009, which was prepared by Delta Environmental for the subject site. The scope of work presented in the above-mentioned work plan addendum consists of installing three groundwater monitoring wells (MW-10, MW-11, and MW-12) and decommissioning and re-installing groundwater monitoring well MW-1. Although the proposed monitoring wells may characterize the lateral extent of groundwater impact down-gradient of the property and address the compromised groundwater monitoring well MW-1, it does not address vertical groundwater contaminant plume characterization since the previously proposed CPT borings are no longer part of the scope of work.

At this time, the proposed scope of work is not approved and ACEH requests that you address the all of the technical comments in previous correspondences (summarized below) and send a comprehensive work plan, due by the date specified below.

TECHNICAL COMMENTS

1. **Soil and Groundwater Characterization** – As stated in our October 16, 2008 correspondence, significantly elevated concentrations of MtBE were detected at the site. Interim remedial action consisting of weekly groundwater extraction appears to have reduced the concentrations of MtBE onsite. However, the vertical and lateral extent of the MTBE contaminant plume in groundwater does not appear defined. Specifically, MTBE was detected at a concentration of 160 µg/L in a groundwater sample collected on January 9, 2006 from monitoring well MW6 prior to the well abandonment on January 12, 2006. Also, it appears from groundwater flow directions calculated at the site that the groundwater contaminant plume that may extend off-site towards former groundwater monitoring well MW-9 and Dublin Boulevard. Therefore, the groundwater contaminant plume appears undefined at this time. Please note that the monitoring well installation scope of work presented in the above-mentioned work plan addendum may not adequately characterize the vertical extent of the groundwater contaminant plume. Considering that the site is located in an active groundwater basin, adequate site characterization is necessary to be protective of human

health, the environment, and ultimately case closure consideration. Therefore, it is recommended that a series of borings are installed prior to installation of permanent groundwater monitoring points. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

2. **Monitoring Well Evaluation** – Also, as stated in our October 16, 2009 correspondence, total depth of groundwater monitoring well MW1 was reported at 9.28 feet below top of casing in the September 19, 2008, "Semi-annual Monitoring Report." However, according to the monitoring well construction details presented in the "Preliminary Groundwater Investigation Report," dated April 7, 1994, the total depth of monitoring well MW1 was reported to be 19 feet. Please evaluate groundwater monitoring well MW1 to ensure that its integrity has not been compromised. Please report your findings in the soil and groundwater investigation work plan due by the date specified below.

TECHNICAL REPORT REQUEST

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

- **April 6, 2010** – Revised Soil and Water Investigation Work Plan
- **Due within 30-days of Sampling** – Semi-Annual Monitoring Report (1st Quarter 2010)
- **Due within 30-days of Sampling** – Semi-Annual Monitoring Report (3rd Quarter 2010)

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 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,

Digitally signed by Paresh Khatri
DN: cn=Paresh Khatri, o=Alameda County Environmental Health, ou=Local Oversight Program, email=Paresh.Khatri@acgov.org, c=US
Date: 2010.02.10 14:23:21 -08'00'

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Tony Perini, Delta Environmental, 312 Piercy Road, San Jose, CA 95138 (*Sent via E-mail to: TPerini@deltaenv.com*)
R. Lee Dooley, Delta Environmental, 312 Piercy Road, San Jose, CA 95138
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (*Sent via E-mail to: cdizon@zone7water.com*)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Paresh Khatri, ACEH (*Sent via E-mail to: paresh.khatri@acgov.org*)
GeoTracker
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	**ISSUE DATE:** July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** 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
         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 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.