



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 5, 2008

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

Mr. Richard Burge
Burge-Pacific Enterprises, Inc.
490 Grand Avenue, Suite 200
Oakland, CA 94610

Subject: Fuel Leak Case No. RO0000505 and Geotracker Global ID T0600102237, 7-Eleven #20009, 2350 Harrison Street, Oakland, CA 94612

Dear Mr. Brown and Mr. Burge:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site including the recently submitted document entitled, "*Sensitive Receptor Survey and Subsurface Investigation Work Plan*," dated November 12, 2008 and prepared by Conestoga-Rovers & Associates on behalf of Shell Oil Products. The Subsurface Investigation Work Plan proposes a site investigation that addresses technical comments in our September 12, 2008 correspondence.

The proposed scope of work is generally acceptable and may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

1. **Soil Sampling in Waste Oil Borings.** We concur with the proposal in the Work Plan to collect continuous soil samples for lithologic description and screening from 5 feet bgs to the bottom of the three proposed soil borings adjacent to the former waste oil tank. Field screening is to be conducted by a qualified field geologist using visual observations, odor, and measurements using a field photoionization detector (PID) fitted with an appropriate lamp and calibrated for the chemicals of concern. Soil samples are to be extracted from the continuous cores at frequent intervals and placed in sealed jars or plastic bags for measurement and recording of VOC concentrations in the headspace using the PID. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed, soil samples are to be collected at fixed intervals of 5 feet bgs from each boring.

2. **Soil Sample Analysis for Waste Oil Borings.** The Work Plan proposes that soil samples from the waste oil borings be analyzed for 1,1,2,2-tetrachloroethane using EPA Method 8260B. In addition to 1,1,2,2-tetrachloroethane, TPH as gasoline, TPH as diesel, and oil and grease were detected in soil samples from boring S-2. Therefore, we request that soil samples from the three proposed waste oil borings be analyzed for TPH as gasoline, TPH as diesel, and oil and grease. We also request that the soil samples be analyzed for the full scan of VOCs using EPA Method 8260B and not limited to reporting of one analyte. Please present these results in the Site Investigation Report requested below.
3. **Soil Vapor Sampling and Analysis.** The Work Plan proposes that soil vapor samples will be analyzed for 1,1,2,2-tetrachloroethane using EPA Method TO-15. We request that the soil vapor samples be analyzed for the full scan of VOCs using EPA Method TO-15 and not limited to reporting of one analyte. Please present these results in the Site Investigation Report requested below.
4. **Proposed Downgradient Sampling Locations.** The proposed grab groundwater sampling locations and methods to evaluate the potential for discharge of contaminated groundwater to surface water are acceptable as proposed.
5. **Soil Sampling in Proposed Borings B-4 and B-5.** We concur with the proposal in the Work Plan to collect continuous soil samples for lithologic description and screening from 5 feet bgs to the bottom of the boring in soil borings B-4 and B-5. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are observed, the collection of soil samples are to be collected at fixed intervals of 5 feet bgs from each boring.
6. **Groundwater Monitoring.** We concur with the proposal to gauge and sample the six existing monitoring wells on a quarterly basis. We request that groundwater samples from wells S-1 and S-6 be analyzed for VOCs using EPA Method 8260B in addition to the proposed analytes. In reviewing previous VOC analytical results for groundwater, Table 3 of the "*Subsurface Investigation Report*," dated July 9, 2008 presents analytical results for VOCs in groundwater for all six wells. However, the laboratory analytical results are not included in the report appendices. Please confirm these VOC analytical results for the June 11, 2008 sampling in the Site Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **May 13, 2009** – Site Investigation Report
- **May 13, 2009** – First Quarter 2009 Groundwater Monitoring Report
- **July 13, 2009** – Second Quarter 2009 Groundwater Monitoring Report

- **October 13, 2009 – Third Quarter 2009 Groundwater Monitoring Report**

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.

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.

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UNDERGROUND STORAGE TANK CLEANUP FUND

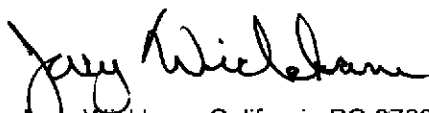
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032

Peter Schaefer, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A
Emeryville, CA 94608

David Siegel, ERAS Environmental, 1533 B Street, Hayward, CA 94541

Donna Drogos, ACEH
Jerry Wickham, 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)