

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-2102

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

February 17, 2006

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

Subject: Fuel Leak Case No. RO0002522, Shell#13-5786, 6750 Santa Rita Road, Pleasanton, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the reports entitled, "Site Conceptual Model/Soil and Groundwater Investigation," dated January 18, 2006 and "Quarterly Groundwater Monitoring and Remediation Status Report – Fourth Quarter 2005," dated January 18, 2006. Both reports were prepared on behalf of Shell by Delta Environmental Consultants, Inc. The Site Conceptual Model/Soil and Groundwater Investigation, report presents results from soil sampling in the source area and boring logs from two additional off-site monitoring wells. The Quarterly Groundwater Monitoring and Remediation Status Report – Fourth Quarter 2005, presents water level measurements and analytical results from sampling activities conducted on October 20, 2005 for monitoring wells MW-1 through MW-5.

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

TECHNICAL COMMENTS

1. **Source Area Characterization.** The source area characterization indicates that two residual source areas are present on site (UST complex and western dispenser island). Based on the results presented, no further investigation is required at this time in the source area.
2. **Quarterly Groundwater Monitoring and Interim Groundwater Extraction.** ACEH concurs with the recommendations to continue quarterly groundwater monitoring and groundwater extraction activities. Additional wells MW-6 and MW-7 are to be included in future quarterly groundwater monitoring. Groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and fuel oxygenates methyl tert-butyl ether and tert-butyl alcohol (TBA) using EPA Method 8260B. Please include results from the quarterly groundwater monitoring and interim groundwater extraction in the reports requested below.

TECHNICAL REPORT REQUEST

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

- **May 15, 2006** - Quarterly Monitoring and Remediation Status Report for the First Quarter 2006
- **August 15, 2006** - Quarterly Monitoring and Remediation Status Report for the Second Quarter 2006
- **November 15, 2006** - Quarterly Monitoring and Remediation Status Report for the Third Quarter 2006

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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).

In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Mr. Denis Brown
February 17, 2006
Page 4

cc: Debbie Arnold
Delta Environmental Consultants, Inc.
175 Bernal Road
San Jose, CA 95119

Matt Katen, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-7-05

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

September 7, 2005

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

Subject: Fuel Leak Case No. RO0002522, Shell#13-5786, 6750 Santa Rita Road, Pleasanton, CA – Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents provided on CD entitled, "Initial Site Conceptual Model and Work Plan," submitted on August 22, 2005, prepared on your behalf by Delta Environmental Consultants, Inc. The work plan proposes a scope of work to advance eleven soil borings and install two monitoring wells to further define the extent of petroleum hydrocarbons in soil and groundwater. The work plan also proposes batch groundwater extraction on a quarterly basis. ACEH concurs with the proposed scope of work provided that the technical comment below is addressed. The Initial Site Conceptual Model (SCM) summarizes site conditions, identifies data gaps, and includes recommendations for additional investigation. The electronic SCM was concise and well written. We received a hard copy and the electronic files include a signed perjury statement. On future electronic technical documents, please also include the certification by a licensed professional.

We request that you address the following technical comment, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Boring B-4.** We request that boring B-4 be extended in depth to a depth of approximately 45 feet below ground surface to collect a groundwater sample, similar to the groundwater sampling proposed for borings B-1, B-7, and B-11.

TECHNICAL REPORT REQUEST

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

- **November 15, 2005** - Quarterly Monitoring and Remediation Status Report for the Third Quarter 2005
- **January 19, 2006** - Updated Site Conceptual Model with Soil and Groundwater Investigation Results
- **February 15, 2006** - Quarterly Monitoring and Remediation Status Report for the Fourth Quarter 2005

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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board 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.

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.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Debbie Arnold, Delta Environmental Consultants, 175 Bernal Road, San Jose, CA 95119

Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway, Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
6-13-05

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

June 13, 2005

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

Subject: Fuel Leak Case No. RO0002522, Shell#13-5786, 6750 Santa Rita Road, Pleasanton, CA – Comments on CPT Groundwater Investigation

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the reports entitled, "Cone Penetration Test (CPT) Groundwater Investigation," dated March 3, 2004, and "Quarterly Groundwater Monitoring and Remediation Status Report – First Quarter 2005," dated April 15, 2005. Both reports were prepared on behalf of Shell by Delta Environmental Consultants, Inc. The CPT Groundwater investigation report presents the results from three CPT borings drilled in December 2003. The purpose of the CPT borings was to provide lateral and vertical definition of fuel oxygenates and total petroleum hydrocarbons in groundwater.

Based on staff review of the documents referenced above, we request that you prepare a work plan for additional characterization of the site. Please address the following technical comments, perform the proposed work, and send us the reports described below. The technical comments are to be addressed in the work plan requested below.

TECHNICAL COMMENTS

1. **Source Area Characterization.** The extent of soil and groundwater contamination within the area of the USTs and dispensers has not been characterized. Therefore, please propose an investigation to characterize the extent of contamination within the source area. Please present plans for the source area investigation to include soil and groundwater sampling in the work plan requested below.
2. **Groundwater Samples in Boring CPT-1.** Two groundwater samples were collected from boring CPT-1 at depths of 56 and 70 feet below ground surface (bgs), respectively. A sand layer that extends from 43 to 49 feet bgs was the shallowest and thickest coarse-grained zone encountered in boring CPT-1. ACEH requests that a depth-discrete groundwater sample be collected from this sand interval within the central portion of the plume.
3. **Monitoring Well MW-1.** Figure 2 of the report shows the concentration of MTBE in the "50-foot groundwater zone." Wells MW-2 and MW-3, which have the highest concentrations of MTBE detected at the site, appear to be screened within a clayey sand unit at the base of the wells (the wells extend to depths of 42.5 and 44 feet bgs, respectively. Well MW-1, which extends to a depth of 42 feet bgs does not appear to intersect a coarse-grained layer near

the base of the well. Please include plans to investigate the extent of groundwater contamination below 42 feet bgs in the area of MW-1.

4. **Well MW-5.** Well MW-5 was installed on January 26, 2005. ACEH concurs with the installation of well MW-5 as a downgradient monitoring well. However, due to the variations in the apparent groundwater flow direction at the site, ACEH requests that a downgradient monitoring well also be installed east of CPT-3. Plans for monitoring well installation are to be presented in the work plan requested below.
5. **Groundwater Elevation Contour Map.** Please present the most recent groundwater elevation contour map in the work plan requested below. The groundwater elevation contour map is to include a rose diagram to show the variations in groundwater flow direction over time.
6. **Interim Groundwater Remediation.** Please include plans for interim groundwater extraction or remediation in the work plan requested below.

TECHNICAL REPORT REQUEST

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

- **July 15, 2005** - Quarterly Report for the Second Quarter 2005
- **August 16, 2005** - Work Plan for Additional Soil and Groundwater Investigation
- **October 17, 2005** - Quarterly Report for the Third Quarter 2005
- **January 17, 2006** - Quarterly Report for the Fourth Quarter 2005

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.

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

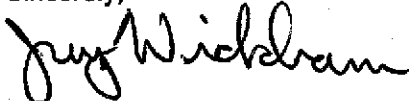
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Debbie Arnold
Delta Environmental Consultants, Inc.
175 Bernal Road
San Jose, CA 95119

Matt Katen, Zone 7 Water District, QIC 80201
Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



B-25-03

RO0002522

March 24, 2003

Ms. Karen Petryna
Shell Oil Products Company US
P.O. Box 7869
Burbank, CA 91510-7869

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

RE: SWI and SCM for Shell Station, 6750 Santa Rita Road, Pleasanton, CA

Dear Ms. Petryna:

This letter follows a review of the fuel leak case file for the above referenced site. This office is particularly concerned with the presence of the gasoline oxygenates Methyl tert-Butyl Ether (MtBE) and tert-Butanol (TBA) at the site, and the site's location within the recharge zone of the groundwater basin. This letter presents a request to complete a Soil and Water Investigation (SWI) and prepare a Site Conceptual Model (SCM) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be considered as part of the required SWI and SCM. **We request that you prepare and submit a work plan for the SWI by May 9, 2003, that addresses each of the following comments.**

TECHNICAL COMMENTS

1. Preferential Pathway Study

A conduit and well survey shall be prepared for the site. This survey will include, among other components, the submittal of map(s) showing the location, within ½ mile of the site, of all wells (monitoring and production wells: active, inactive, standby, destroyed, abandoned), surface water (creeks, flood control channels), and location and depth of all utility lines and trenches (e.g., sewer and storm drain lines) identified in the study.

The conduit study and data from the previous investigation at the site will aid you in the development of the initial three-dimensional SCM of site conditions. You are to use this initial SCM to determine the appropriate configuration for samplings points in the SWI phase of work at this site. Discuss your analysis and interpretation of the results of the conduit study and explain your rationale for the configuration of sampling points in the SWI work plan. **You shall also evaluate the probability of the contaminant plume encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper aquifers, and discuss this in the work plan.**

You may present the preferential pathway study in the pending SWI workplan.

2. Site Conceptual Model

Starting with a critical review of the completed conduit study and data from the previous investigation and tank operational records for this site, you are to develop the initial three-dimensional SCM of site conditions. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP).

Your attention is directed to "*Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE*," American Petroleum Institute Publication No. 4699, dated February 2000 as a resource for development of the SCM. Your attention is also directed to the State Water Resources Control Board (SWRCB) "*Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft*", dated March 27, 2000, as well as the June 2002 ChevronTexaco Energy Research and Technology Company technical bulletin entitled "*Mass Flux Estimates to Assist Decision-Making*" to help in development of the SCM, among other related tasks. I can provide copies of any of these documents if you need them

You are requested to use this initial SCM to help you determine the appropriate configuration for samplings points in the pending SWI phase of work at this site. Please discuss in the SWI workplan your analysis and interpretation of the results of the conduit study and SCM, and explain your rationale for the configuration of proposed sampling points.

3. Contaminant Plume Definition – Soil and Groundwater

The purpose of contaminant plume definition is to determine the *three-dimensional* extent of contamination in soil and groundwater, including a determination of 3-D extent of impacts in the source area(s) and released contaminant mass, and a demarcation of potential geogenic and anthropomorphic flow pathways. As you know, up to 8,000 parts per billion (ppb) MtBE and 1500 ppb TBA were detected in well MW-3 as recently as December 2002.

Conventional investigation techniques and monitoring well networks currently used at fuel leak sites are generally insufficient to adequately characterize impacts posed by MtBE and other fuel oxygenates. It is recommended that your investigation initially incorporate expedited site assessment techniques and borings. The borings are to be continuously cored and logged, with close attention paid to changes in lithologies that might facilitate solute transport. The methodology employed should minimize the potential for cross-contamination.

Soil samples should be collected for laboratory analysis at 5 foot intervals, areas of obvious contamination, the soil/groundwater interface, and at each lithologic change noted during boring advancement, at a minimum. Water samples are to be collected at discrete depths to total depth explored. Detailed cross-sections, fence diagrams, structural contours and isopachs, and rose diagrams for groundwater flow (incorporating all historic data), should be subsequently incorporated into the SWI report, as appropriate. Cross-sections should be scaled to clearly illustrate subsurface lithologies, including the locations of stringers and other zones of relatively-higher permeability, particularly in those areas where such zones may be intercepted by buried utilities.

Final well locations and screen depths/lengths will be substantially based on the results of the SWI and refined SCM. The monitoring of multiple discrete water-bearing zones with short-screened intervals may be anticipated. Generally, these screened intervals should not be greater than 2' in length when assessing fuel oxygenate releases. We will expect that the SWI Report will propose the locations of such wells, the anticipated well screen depths, their configurations (e.g., single, well cluster or multi-level), and the reasoning behind the location and configuration of each.

Discuss your proposal for performing this work outlined, above, in the SWI work plan. The results of the conduit study, and the initial SCM, are to be presented and discussed in the SWI work plan to justify your proposed scope of work.

Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of the plume. Technical protocol for expedited site assessments are provide in the US EPA "*Expedited Site Assessment Tools for Underground Storage Tank Sites: A guide for Regulators*" (EPA 510-B-97-001), dated March 1997.

4. Corrective Action Plan

The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective **final cleanup objectives and remedial alternatives for both soil and groundwater impacts, including those caused by MtBE and other fuel oxygenates**, that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

A final CAP for the soil and groundwater impacts caused by an unauthorized release at the site will be requested upon completion of the final phase of the SWI in accordance with a schedule to be specified at a later time. The CAP shall address at least two technically and economically feasible methods to restore and protect beneficial uses of water and to meet the cleanup objectives for each contaminant established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

May 9, 2003 – Work plan for Soil and Water Investigation

Ms. Karen Petryna
Re: 3790 Hopyard Rd., Pleasanton
February 27, 2003
Page 4 of 5

60 Days from SWI Work Plan Approval – Soil and Water Investigation Report

April 15, 2003 – Quarterly Report for the First Quarter 2003

July 15, 2003 – Quarterly Report for the Second Quarter 2003

October 15, 2003 – Quarterly Report for the Third Quarter 2003

January 15, 2004 – Quarterly Report for the Fourth Quarter 2003

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately-registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

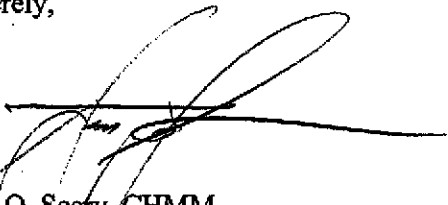
All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Ms. Karen Petryna
Re: 3790 Hopyard Rd., Pleasanton
March 24, 2003
Page 5 of 5

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
Matt Katen, Zone 7 Water Agency
Danielle Stefani, Livermore-Pleasanton Fire Department