

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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(510) 567-6700
FAX (510) 337-9335

May 9, 2007

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

Subject: Fuel Leak Case No. RO0002524 and Geotracker Global ID T0600162519, Shell#13-5442, 809 East Stanley Boulevard, Livermore, CA 94550

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the recently submitted reports entitled, "Semi-Annual Fourth Quarter 2006 Groundwater Monitoring Report," dated January 15, 2007 and "Request for Case Closure Letter," dated April 2, 2007. Both reports were prepared on Shell's behalf by Delta Environmental Consultants, Inc. The Quarterly Monitoring Report presents the results from groundwater sampling conducted on November 7, 2006. During a previous semi-annual groundwater sampling event on January 10, 2006, tert-butyl alcohol (TBA) was detected in wells MW-1 and MW-2 at concentrations of 1,000 and 24 micrograms per liter ($\mu\text{g/L}$), respectively. TBA was not detected in site wells during the November 7, 2007 groundwater sampling event. No further groundwater monitoring is required at this time.

The "Request for Case Closure Letter," concludes that there are no apparent releases of petroleum hydrocarbons at the site, no impacts to groundwater, and there are no known nearby sensitive receptors. The report requests closure of the fuel leak case for the site. Based on our review of the case file and "Request for Case Closure Letter," further documentation on the removal of the former fuel USTs in the southern portion of the site and additional information on water supply wells is required prior to considering case closure. We request that you address the technical comments below, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Tank Removals in Southern Portion of Site.** Sometime after 1989, the fuel USTs were apparently relocated from the southern portion of the site to their current location near the corner of Murietta and Stanley Boulevards. The "Request for Case Closure Letter," indicates that no reports that describe removal and location of the fuel USTs after 1989 could be located. We request that you review your files and files from Livermore-Pleasanton Fire Department in order to confirm the removal of these tanks and provide information on the conditions encountered during removal. As requested below, please submit this information along with a copy of the Kaprealian Engineering, Inc. report that describes the fuel and waste oil UST removal in November 1986.

2. **Fuel Releases at the Site.** There is evidence of fuel releases at the site prior to 1986 in the area of the former USTs. Product odors were noted in boring logs for all three soil borings advanced in 1986 in the area of the former UST (Emcon Associate September 8, 1986); however, no soil samples were collected from the intervals where product odors were observed. Analytical results from soil boring SB-5 which was advanced in the area of the former USTs on June 23, 2006 indicate that the petroleum hydrocarbons are present in soil between depths of 25 to greater than 68.5 feet bgs with total petroleum hydrocarbons as gasoline being detected at concentrations up to 1,460 milligrams per kilogram (mg/kg).
3. **Detailed Well Survey.** Previous well surveys for the site appear to only include public drinking water supply wells located on Geotracker. Consideration of only public supply wells is not sufficient to assess whether there are receptors for the site. We request that you conduct a well survey to locate all water supply wells (active, inactive, standby, decommissioned, and abandoned wells) within a 2,000-foot radius of the site. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please provide a table that includes the well designation, location, total depth, diameter, screen interval, date of well installation, current status, historic use, and owner of the wells. In addition, please provide well logs and completion records for any wells downgradient from the site that are potential receptors for the site. We recommend that you obtain well information from the Zone 7 Water Agency and State of California Department of Water Resources, at a minimum. Please report your results in the Well Survey Report requested below.

TECHNICAL REPORT REQUEST

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

- **July 30, 2007** – Tank Removal Reports and Detailed Well Survey 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

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).

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

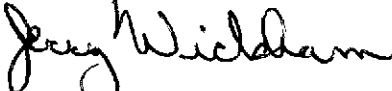
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety

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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) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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

R. Lee Dooley
Delta Environmental Consultants, Inc.
175 Bernal Road
San Jose, CA 95119

Donna Drogos, ACEH
Jerry Wickham, ACEH
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