

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
06-01-06

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

May 31, 2006

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

Subject: Fuel Leak Case No. RO0002882, Shell, 1801 Santa Rita Road, Pleasanton, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the electronic submittal entitled, "Updated Site Conceptual Model – May 2006," dated May 19, 2006. The Updated Site Conceptual Model was prepared on Shell's behalf by Delta Environmental Consultants, Inc. and presents the results of soil and groundwater sampling conducted in February 2006. Three monitoring wells were installed to monitor shallow groundwater approximately 45 to 55 feet below ground surface (bgs). Water levels have risen approximately 40 feet since existing wells MW-1 through MW-4 were installed in 2002. Based on the results of the February 2006 investigation, we request that quarterly groundwater monitoring be continued as requested in the technical comment below.

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

**TECHNICAL COMMENTS**

1. **Quarterly Groundwater Monitoring.** Please collect groundwater samples on a quarterly basis from each of the monitoring wells. The groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPH-G), total petroleum hydrocarbons as diesel (TPH-D), benzene, toluene, ethylbenzene, total xylenes (BTEX compounds), and five fuel oxygenates, methyl-t-butyl ether (MTBE), diisopropyl ether (DIPE), ethyl-t-butyl ether (ETBE), tert-amyl methyl ether (TAME), and tert-butanol (TBA). Please present the results in the monitoring reports requested below.

### TECHNICAL REPORT REQUEST

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

- **August 15, 2006** – Quarterly Monitoring Report for Second Quarter 2006
- **November 15, 2006** – Quarterly Monitoring Report for Third Quarter 2006
- **February 15, 2007** – Quarterly Monitoring Report for Fourth 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](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**

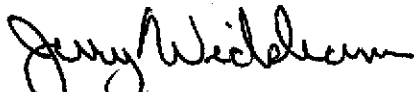
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**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: 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

Denis Brown  
May 31, 2006  
Page 4

Debbie Arnold  
Delta Environmental Consultants, Inc.  
175 Bernal Road, Suite 200  
San Jose, CA 95119

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



*out*  
*12-29-05*

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

December 28, 2005

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

Subject: Fuel Leak Case No. RO0002882, Shell, 1801 Santa Rita Road, Pleasanton, CA – Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the electronic submittal entitled, "Site Conceptual Model – Work Plan," dated December 16, 2005. The Site Conceptual Model – Work Plan was prepared on Shell's behalf by Delta Environmental Consultants, Inc. The Work Plan proposes the installation of soil borings and monitoring wells to investigate the extent of fuel hydrocarbons in soil and groundwater at the site. ACEH concurs with the proposed scope of work provided that the technical comments below are addressed during the field investigation.

ACEH requests that you address the following technical comments, 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](mailto:jerry.wickham@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

1. **Borings B-1 through B-4.** The Work Plan indicates that grab groundwater samples will be collected from each of the proposed soil borings if groundwater is encountered at the proposed depth of 55 to 60 feet below ground surface (bgs). If groundwater is not encountered between 55 and 60 feet bgs, we request that the soil borings be extended beyond the proposed depth of 60 feet in order to collect a grab groundwater sample from each boring. Please present the results in the Soil and Groundwater Investigation Report requested below.
2. **Well Screen Length.** In order to allow for water table fluctuations, we request that the proposed well screen length be increased to 10 feet.
3. **Analytical Methods for Ethylene Dibromide.** EPA Method 8260 is acceptable for analysis of ethylene dibromide in soil. EPA Method 524.2/624 (8260) is acceptable for analysis of ethylene dibromide in groundwater instead of the proposed EPA Method 504.1 analysis. Please present the results in the Soil and Groundwater Investigation Report requested below.

4. **Discussion of Water Level Changes.** Please revise the text in the SCM that discusses the approximately observed changes in depth to water in the monitoring wells. The water level change is currently described as a decrease in depth to water in the Data Gaps column but is described as an increase in depth to water in the adjacent Work Necessary to Fill Data Gaps column. Please present the results in a revised Site Conceptual Model.
5. **Quarterly Groundwater Monitoring.** Following installation of the proposed monitoring wells, please collect groundwater samples on a quarterly basis from each of the monitoring wells. The groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPH-G), total petroleum hydrocarbons as diesel (TPH-D), benzene, toluene, ethylbenzene, total xylenes (BTEX compounds), five fuel oxygenates, methyl-t-butyl ether (MTBE), diisopropyl ether (DIPE), ethyl-t-butyl ether (ETBE), tert-amyl methyl ether (TAME), and tert-butanol (TBA), 1,2-dichloroethane (1,2-DCA), and ethylene dibromide. Please present the results in the monitoring reports requested below.

#### **TECHNICAL REPORT REQUEST**

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

- **May 19, 2006** – Soil And Groundwater Investigation Report with Revised Site Conceptual Model
- **August 15, 2006** – Quarterly Monitoring Report (Second Quarter 2006)
- **November 15, 2006** – Quarterly Monitoring Report (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.

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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](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](mailto: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.

Denis Brown  
December 28, 2005  
Page 4

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: 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

Debbie Arnold  
Delta Environmental Consultants, Inc.  
175 Bernal Road, Suite 200  
San Jose, CA 95119

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File



ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



SENT  
10-4-05

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

October 4, 2005

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

Subject: Fuel Leak Case No. RO0002882, Shell, 1801 Santa Rita Road, Pleasanton, CA –  
Request for Work Plan

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site, including the report entitled, "Soil Sampling Report," dated December 20, 2002 and an Unauthorized Release (Leak)/Contamination Site Report (URF) dated May 5, 2005. The URF dated May 5, 2005 indicates that petroleum hydrocarbons and oil and grease were detected in a soil sample collected from an excavation during hoist replacement. The case file also indicates that petroleum hydrocarbons have been detected in groundwater samples collected from monitoring wells MW-2 and MW-3 at the site.

Please submit a work plan detailing your proposal to define the extent of soil and groundwater contamination by **December 16, 2005**. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

**REQUEST FOR INFORMATION**

ACEH's case files for the subject site contains only the report entitled, "Soil Sampling Report," dated September 2, 2004. We request that you submit copies of any other reports you have documenting additional investigation activities or other work related to this UST system/site with 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:

- **December 16, 2005 – Work Plan for Soil and Groundwater Investigation**

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](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

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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.

### LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site. **ACEH has received a list of current property owners in correspondence dated September 6, 2005 that meets this latter requirement.**

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

*A. In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):*

*cleanup proposal (Corrective Action Plan)*

*request for case closure*

*local agency intention to make a determination that no further action is required*

*local agency intention to issue a closure letter*

- OR -

*B. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.*

**(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)**

#### **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.

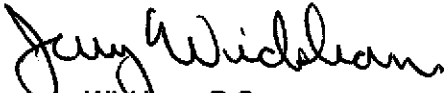
#### **AGENCY OVERSIGHT**

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Mr. Denis Brown  
October 4, 2005  
Page 4

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Debbie Arnold  
Delta Environmental Consultants, Inc.  
175 Bernal Road, Suite 200  
San Jose, CA 95119

Donna Drogos, ACEH  
Jerry Wickham, ACEH