



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 25, 2011

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

Shahriar Almasi
Portola Valley Shell
965 Laurel Glen Drive
Palo Alto, CA 94304

Subject: Case File Review for Fuel Leak Case No. RO0000006, Shell#13-9619, 3420 San Pablo Avenue, Oakland, CA 94608

Dear Denis Brown and Shahriar Almasi:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the most recent report entitled, "*Groundwater Monitoring Report – Second Quarter 2011*," dated July 5, 2011. The report was prepared on Shell's behalf by Conestoga-Rovers & Associates. This site was also discussed during a meeting held on February 17, 2011 between Mr. Denis Brown of Shell Oil Products, Mr. Peter Schaefer of Conestoga-Rovers & Associates, and Mr. Jerry Wickham of ACEH.

Elevated concentrations of petroleum hydrocarbons remain in groundwater within on-site and off-site monitoring wells. The highest concentrations of dissolved phase hydrocarbons are generally detected in groundwater from wells MW-2 and MW-6R, which are located along the northern margin of the site adjacent to 35th Street. Based on our review of the case file, we request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Soil Vapor Sampling.** In October 2006, soil vapor samples were collected from three locations in the area of the on-site station building due to elevated concentrations of fuel hydrocarbons detected in groundwater and the intermittent presence of separate phase hydrocarbons in well MW-6R. Petroleum hydrocarbons were not detected in the three soil vapor samples; however, the reporting limits for the analyses were elevated and the samples were analyzed beyond holding times. We request that you propose additional soil vapor sampling in the Work Plan requested below to confirm the previous conclusions that vapor intrusion does not pose a potential risk for the site.

2. **Lead in Soil.** Lead was detected at a concentration of 2,000 milligrams per kilogram (mg/kg) in a soil sample (P-7-2.0) collected beneath the former dispenser island along 35th Street. Lead was also detected at elevated concentrations in soil samples from SB-1 and SB-2, which were also advanced in the area of the former dispensers. Selected soil samples from boring SB-1, SB-2, and SB-3 also contained elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg). In the Work Plan requested below, please evaluate whether the extent of elevated concentrations of TPHg and lead in soil has been defined to the extent necessary to make decisions regarding potential remedial options. If additional investigation is needed, please present plans for the additional investigation in the Work Plan requested below.
3. **Hydraulic Gradient and Plume Stability.** Groundwater mounding in the interior and northwestern portions of the site have not allowed clear definition of groundwater flow directions across the site. The uncertainty in groundwater flow directions and the potential for multiple releases from different areas of the site also make it difficult to assess plume stability. Elevated concentrations of TPHg continue to be detected in groundwater monitoring well MW-10, which is the only off-site well in a downgradient direction. In the Work Plan requested below, please evaluate whether downgradient plume extent has been sufficiently defined and whether data from well MW-10 are sufficient to evaluate natural attenuation of the plume. If additional investigation is needed, please present plans for the additional investigation in the Work Plan requested below.
4. **Separate Phase Hydrocarbons (SPH).** Separate-phase hydrocarbons (SPH) have been observed historically in wells MW-1, MW-2, MW-4, MW-5, MW-6, MW-6R, and MW-7. During the past year, SPH has been observed only in monitoring well MW-6R. A SPH-absorbent canister has been placed in well MW-6R. The "*Groundwater Monitoring Report – Second Quarter 2011*," dated July 5, 2011 recommends replacing the SPH-absorbent canister in MW-6R quarterly. We have no objections to the SPH monitoring and recovery at this time.
5. **Groundwater Monitoring.** Please include analysis for ethylene dibromide and 1,2-dichloroethane during future semiannual groundwater monitoring events.

TECHNICAL REPORT REQUEST

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

- **September 29, 2011** – Work Plan
- **February 10, 2012** – Fourth Quarter 2011 Groundwater Monitoring Report
- **July 10, 2012** – Second Quarter 2012 Groundwater Monitoring Report

Responsible Parties
RO0000006
July 25, 2011
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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

Attachment: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Peter Schaefer, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A
Emeryville, CA 94608 (*Sent via E-mail to: pschaefer@croworld.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)

GeoTracker, e-File

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

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 deh.loptoxic@acgov.org
 - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - 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 deh.loptoxic@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.