



**CONESTOGA-ROVERS
& ASSOCIATES**

19449 Riverside Drive, Suite 230, Sonoma, California 95476
Telephone: 707-935-4850 Facsimile: 707-935-6649
www.CRAworld.com

RECEIVED

1:23 pm, May 22, 2007

Alameda County
Environmental Health

To Whom it May Concern,

We are pleased to announce that effective April 2, 2007, Cambria Environmental Technology, Inc (Cambria) was acquired by Conestoga-Rovers & Associates (CRA) and will be conducting all future work under this new name. Our project managers, business addresses, and telephone contact numbers will remain the same. Our e-mail addresses change to *****@craworld.com. Please contact me if you would like to discuss this transition and CRA.

Sincerely,

Diane M. Lundquist
Vice President

Equal
Employment
Opportunity Employer



Denis L. Brown

Shell Oil Products US

HSE -- Environmental Services
20945 S. Wilmington Ave.

Carson, CA 90810-1039

Tel (707) 865 0251

Fax (707) 865 2542

Email denis.l.brown@shell.com

Jerry Wickham
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: Former Shell Service Station
1285 Bancroft Avenue
San Leandro, California
SAP Code 136017
Incident No. 98996067
ACHCSA Case No. 988

Dear Mr. Wickham:

The attached document is provided for your review and comment. Upon information and belief, I declare, under penalty of perjury, that the information contained in the attached document is true and correct.

If you have any questions or concerns, please call me at (707) 865-0251.

Sincerely,

A handwritten signature in black ink, appearing to read "Denis L. Brown", is located below the "Sincerely," text.

Denis L. Brown
Project Manager



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May 22, 2007

Mr. Jerry Wickham
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: **Site Investigation Work Plan**
Shell-branded Service Station
1285 Bancroft Avenue
San Leandro, California
Sap Code 136017
Incident No. 98996067
RO0000156

Dear Mr. Wickham:

Conestoga-Rovers & Associates, Inc. (CRA) prepared this work plan on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell) to further delineate the lateral and vertical extent of soil and groundwater impacts of the site. The proposed scope of work was proposed in Cambria Environmental Technology, Inc.'s (Cambria) February 9, 2007 *Agency Response and Proposed Future Actions* document, and approved in the Alameda County Health Care Services Agency (ACHCSA) correspondence dated March 9, 2007 (Attachment A).

SITE DESCRIPTION AND HISTORY

Site Location: The operating Shell-branded service station is located at the northwest corner of Bancroft and Estudillo Avenues in San Leandro, California (Figures 1 and 2). There are three underground storage tanks (USTs) on site, two dispenser islands, and one station building with three automobile service bays.

Project History: A detailed chronologic description of historical investigative and remedial activities at this site was provided in the above-referenced February 9, 2007 submittal.

Surrounding Land Use: The area surrounding the site is primarily residential.

Local Topography: The site is approximately 65 feet above mean sea level and slopes very gently to the west, toward San Francisco Bay. San Leandro Creek is located approximately 500 feet northwest of the site.

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Local Geology: Sediments beneath the site are Quaternary alluvial deposits derived from sedimentary and igneous rocks of the Diablo Range from the Holocene formation. The Hayward Fault Zone lies approximately one mile east of the site. The site is underlain by low estimated permeability sediments (clay) with interspersed moderate estimated permeability sediments. During recent investigations at the site, soil consisted of silty clay, clayey silts, and clayey sandy silt interlaid with sands and gravels to the total explored depth of 60.0 feet below grade (fbg).

Groundwater: Groundwater beneath the site typically flows in a south-southwesterly direction with seasonal variations to both the southwest and northwest. Depth to water beneath the site has historically ranged between 32 and 38 fbg.

TECHNICAL RATIONALE FOR PROPOSED SCOPE OF WORK

The ACHCSA's October 20, 2006 correspondence discussed concerns about elevated concentrations of petroleum constituents in groundwater near onsite well MW-5 and southwest of the USTs. The ACHCSA stated that more aggressive remediation of the source area is required due to the presence of numerous water producing wells within 2,000 feet of the site. However, based on the risk evaluation results, Cambria concluded that the conditions beneath the subject site do not pose a threat to onsite or offsite receptors, but that additional investigation and evaluation are necessary. Cambria made recommendations for investigation which were approved by ACHCSA in their March 9, 2007 correspondence. The work consists of:

- Advance borings CPT-1 through CPT-4 to obtain continuous lithologic information along the direction of groundwater flow, and collection of depth-discrete groundwater samples from the shallow coarse-grained zone, the deeper coarse-grained zone, and deeper still, for vertical assessment. As depicted on Figure 2, proposed CPT locations are located upgradient (CPT-4) of the site, near well MW-2 (CPT-2), near well MW-1 (CPT-3), and downgradient (CPT-1) of the site. The upgradient location is warranted to evaluate whether other sources are contributing to the plumes beneath the site.
- To delineate the vertical and lateral extent near the UST complex, CRA proposes advancing hollow-stem auger borings SB-13 through SB-16 for obtaining shallower soil samples than previously collected at MW-2, and to collect deeper samples for comparison of degradation of soil concentrations over time. Proposed locations are shown on Figure 2.



WORK TASKS

Access Agreement: On behalf of Shell, CRA will obtain an access agreement from the owner of the property or properties where the offsite CPT boring locations are proposed.

Permits: Once an access agreement has been secured, CRA will obtain the required drilling permit from ACHCSA for the boring locations.

Site Safety Plan: CRA will prepare a comprehensive Site-Specific Safety Plan to protect site workers. The plan will be reviewed and signed by each site worker and kept on the site during field activities.

Utility Clearance: CRA will mark the proposed drilling locations and will clear the locations through Underground Service Alert (USA) prior to drilling. A private utility locating service will be used to verify clearance of subsurface obstructions. Additionally, the first five feet of each boring will be cleared to a diameter of three inches larger than the lead auger using an air-knife or similar-type equipment to minimize potential damage to underground structures not identified through USA.

Site Investigation: Eight soil borings (SB-13 through SB-16, and CPT-1 and CPT-4) are proposed at the locations shown on Figure 2. Soil borings SB-13 through SB-16 will be drilled using hollow-stem auger (HSA) equipment to approximately 35 fbg. Borings CPT-1 through CPT-4 will be extended to a maximum depth of approximately 90 fbg using Cone Penetration Testing (CPT) equipment and will be used to assess the lithology and the vertical extent of impacted soil and groundwater on and offsite.

A CRA geologist will supervise the drilling and describe encountered soils in borings SB-13 through SB-16 using the Unified Soil Classification System and Munsell Soil Color Charts. The CPT borings will be electronically logged using CPT equipment logging techniques. During the HSA work, soil samples will be collected continuously from 5 fbg to the bottom of the boring for lithologic description. Soil samples will be screened in the field for organic vapors using a photo-ionization detector (PID). Exploratory boring logs will be prepared for each boring. PID measurements will be recorded on the boring logs.

Soil samples designated for chemical analyses will be retained at five-foot intervals from all HSA borings in steel, brass, or plastic tubes. The tubes will be covered on both ends with Teflon sheets and plastic end caps. No soil sampling is proposed from the CPT borings. Rather, upon review of the electronic CPT logs, discreet groundwater samples will be targeted from at least three water bearing zones: the shallow coarse-grained zone, the deeper coarse-grained zone, and deeper still for vertical groundwater assessment. The actual intervals sampled will be determined based on a review of the



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electronic lithologic log. Groundwater samples from the CPT borings will be collected using Hydropunch ® or similar sampling equipment and will be contained in appropriate sample containers supplied by the laboratory. Up to 20 minutes will be allowed for collection of a water sample from each interval.

Upon their collection, each soil and groundwater sample will be labeled, entered onto a chain-of-custody record, and placed into a cooler with ice for transport to a State of California certified laboratory for analysis. A standard two week turn-around time will be requested for laboratory results.

Chemical Analyses: Based on the results of previous samples, the groundwater and selected soil samples will be analyzed for TPHg and BTEX by either EPA Method 8015M or 8260B , and MTBE, tertiary butyl alcohol (TBA), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and di-isopropyl ether (DIPE) by EPA Method 8260B.

Report Preparation: Following the receipt of analytical results from the laboratory, CRA will prepare a written report which will include a description of the field procedures, a presentation of the analytical results, tabulated data, figures showing sample locations, the complete analytical laboratory reports, CPT electronic logs, boring logs with well construction details, findings and conclusions, and recommendations.

CERTIFICATION

The scope of work described in this work plan will be performed under the supervision of a California professional geologist or engineer.

SCHEDULE

CRA is prepared to begin work upon approval of this work plan by ACHCSA and receipt of executed access agreement(s) and approved drilling permit(s). The technical report of findings will be submitted approximately 60 days of receipt of analytical data.



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CLOSING

If you have any questions regarding the scope of work outlined in this work plan, please call Ana Friel at (707) 268-3812.

Sincerely,
Conestoga-Rovers & Associates, Inc.

Celina Hernandez
Senior Staff Geologist

Ana Friel, PG
Associate Geologist

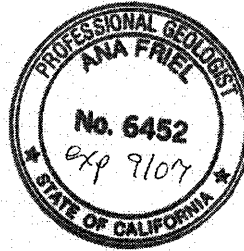


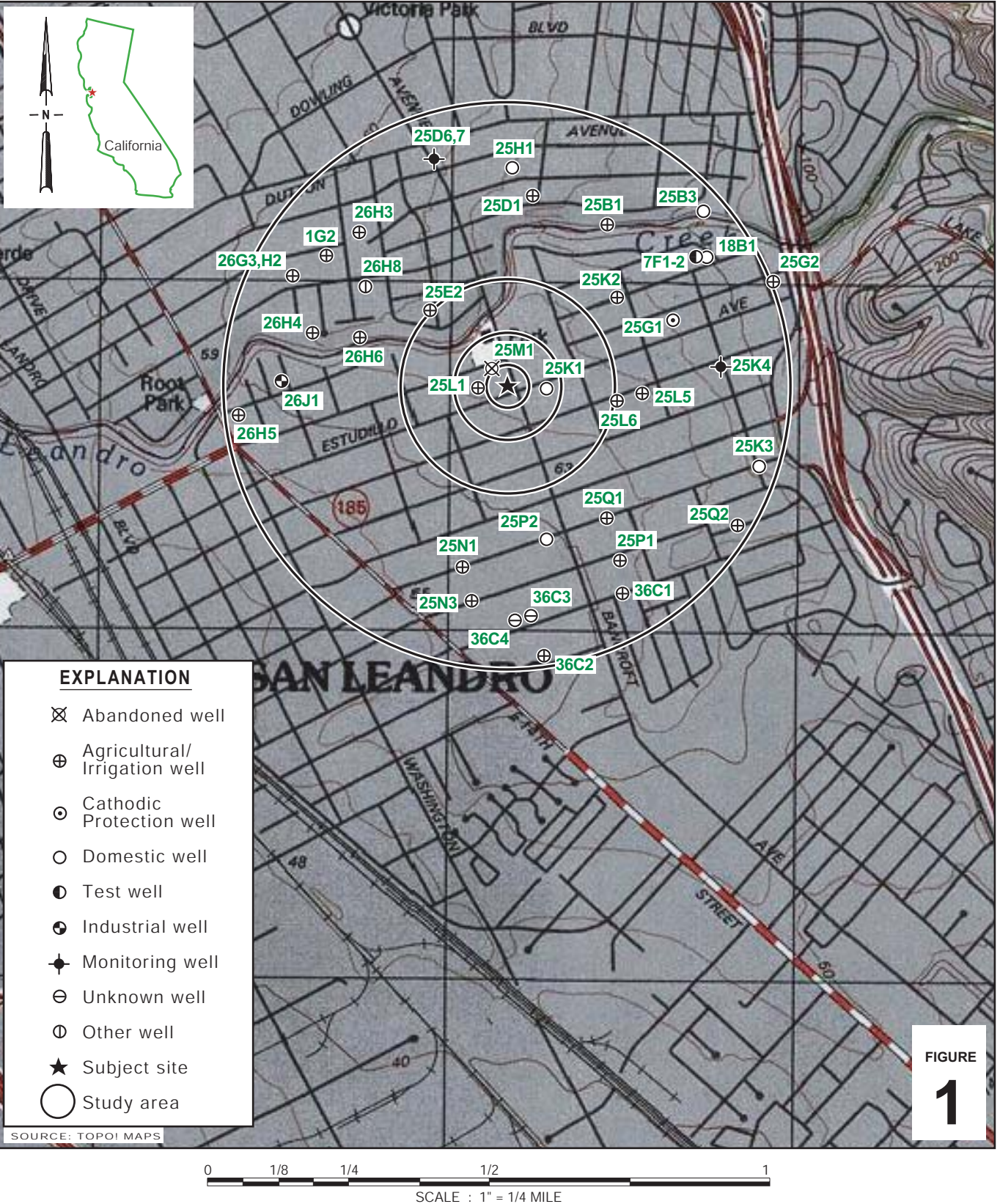
Figure 1. Site Vicinity Map
Figure 2. Proposed Boring Location Map

Attachment A. Regulatory Correspondence

cc: Denis Brown, Shell Oil Products US, 20945 S. Wilmington Ave., Carson, CA 90810
Ivan G. and Joanne Cornelius, 198 Juana Avenue, San Leandro CA 94577

Conestoga-Rovers & Associates (CRA) prepared this document for use by our client and appropriate regulatory agencies. It is based partially on information available to CRA from outside sources and/or in the public domain, and partially on information supplied by CRA and its subcontractors. CRA makes no warranty or guarantee, expressed or implied, included or intended in this document, with respect to the accuracy of information obtained from these outside sources or the public domain, or any conclusions or recommendations based on information that was not independently verified by CRA. This document represents the best professional judgment of CRA. None of the work performed hereunder constitutes or shall be represented as a legal opinion of any kind or nature.

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FIGURE
1

Shell-branded Service Station

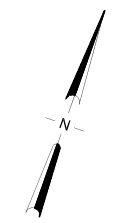
1285 Bancroft Avenue
San Leandro, California



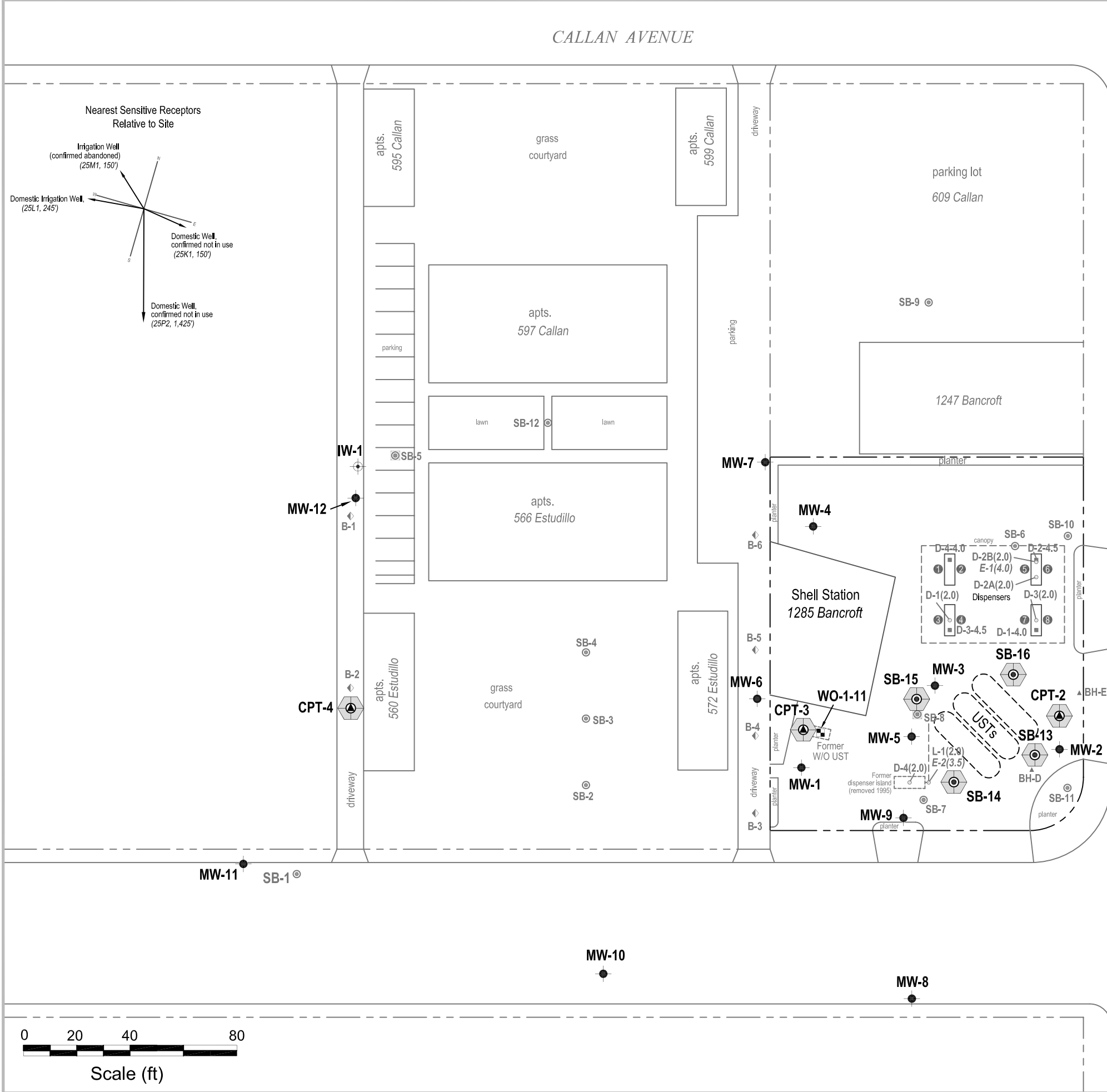
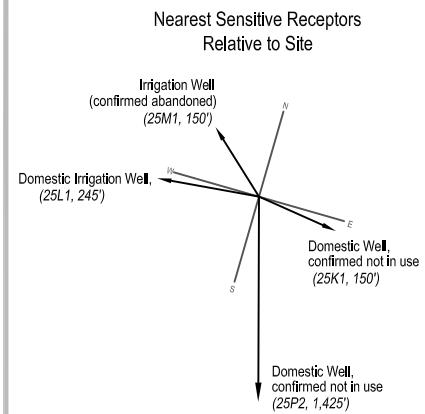
**CONESTOGA-ROVERS
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Vicinity Map

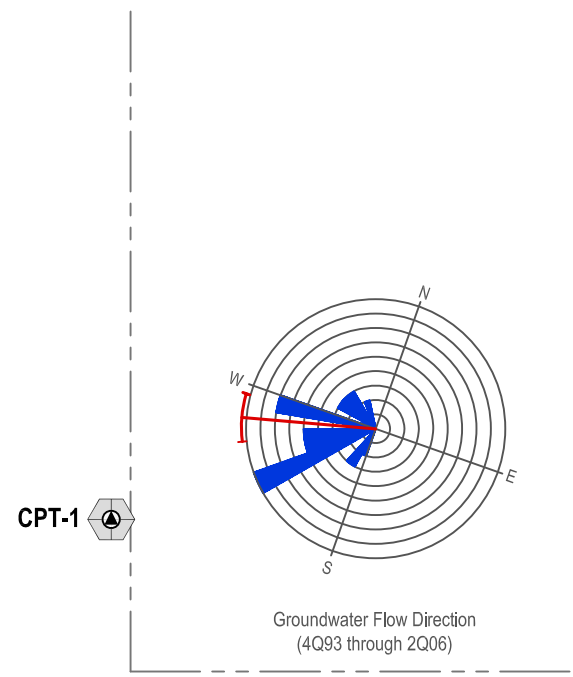
CALLAN AVENUE



EXPLANATION	
SB-13	Proposed soil boring
CPT-1	Proposed CPT boring
WO-1-11	Soil sample location (7/19/06)
MW-1	Monitoring well location
IW-1 (25L1)	Irrigation well location
D-1-4.0	Dispenser soil sample location (1/31/05)
SB-9	Soil boring location (2/04)
SB-1	Soil boring location (8/03)
SB-5	Attempted soil boring location (8/03)
B-1	Soil vapor survey location (6/00)
E-1	Confirmation soil sample location (WA, 10/9/95)
D-1	Soil sample location (WA, 10/4/95)
BH-D	Soil boring location (WA, 1994)
①	Product dispenser number



BANCROFT AVENUE



ESTUDILLO AVENUE

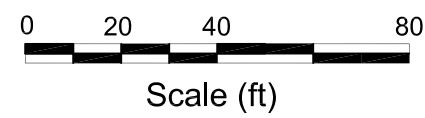


FIGURE 2

Proposed Boring Location Map



Shell-branded Service Station
1285 Bancroft Avenue
San Leandro, California

I:\SON-S\1\SHARED\SONOMA.SHELL\ISAN LEANDRO 1285 BANCROFT\FIGURES\SITE PLAN.DWG

Attachment A

Regulatory Correspondence

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

March 9, 2007

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

MAR 19 2007
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Subject: Fuel Leak Case No. RO0000156 and Geotracker Global ID T0600101224, Shell#13-6017, 1285 Bancroft Avenue, San Leandro, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted report entitled, "Agency Response and Proposed Future Actions," dated February 9, 2007. The report proposes performing a CPT investigation to 90 feet bgs and shallow soil sampling near the UST complex. The proposal to conduct additional investigation near the USTs to evaluate source area remediation is acceptable. We request that you present detailed plans for the investigation in the Work Plan requested below.

The recommendation to continue quarterly groundwater monitoring and to analyze groundwater samples for one hydrologic cycle is also acceptable. Please present the results in the groundwater monitoring reports requested below. ACEH appreciates the hydrogeologic cross sections presented in the "Agency Response and Proposed Future Actions," report. As additional data are collected near the USTs, please update these cross sections and include them in future reports as appropriate.

We request that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **May 23, 2007 – Work Plan**
- **30 days following the end of each quarter – Quarterly 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.

Denis Brown
RO0156
March 9, 2007
Page 2

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) now 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.


Denis Brown
RO0156
March 9, 2007
Page 3

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: Ana Friel
Cambria Environmental Technology, Inc.
270 Perkins Street
Sonoma, CA 95476

John Camp
City of San Leandro
Environmental Services Division
Civic Center
835 East 14th Street
San Leandro, CA 94577

Donna Drogos, ACEH
Jerry Wickham, ACEH
File