

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

August 30, 2006

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

Subject: Fuel Leak Case No. 2000 Phell#13-5243, 11989 Dublin Blvd., Dublin, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site and the document entitled, "Off-Site Well Installation Report," dated August 24, 2006, prepared on behalf of Shell by Delta Environmental Consultants, Inc. The Off-Site Well Installation Report presents the results from installation of two monitoring wells (MW-6 and MW-7) on property east of the site and San Ramon Road. The report indicates that well MW-6 is beyond the downgradient edge of the dissolved-phase hydrocarbon plume and provides a sampling point with which to monitor to be used to monitor the downgradient portion of the plume. Well MW-7 is screened within a deeper groundwater zone and is to be used to monitor the vertical stability of the plume. The report concludes that plume delineation is complete and recommends that wells MW-6 and MW-7 be added to the quarterly monitoring program. We concur that wells MW-6 and MW-7 are to be added to the quarterly groundwater monitoring program in order to confirm plume stability.

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: Mr. Jerry Wickham), according to the following schedule:

- October 16, 2006 Quarterly Monitoring Report for the Third Quarter 2006
- January 15, 2007 Quarterly Monitoring Report for the Fourth Quarter 2006
- April 15, 2007 Quarterly Monitoring Report for the First Quarter 2007

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.

Mr. Denis Brown August 30, 2006 Page 2

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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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, 7835, 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.

Mr. Denis Brown August 30, 2006 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, P.G.

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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

Sunil Ramdass SWRCB Cleanup Fund 1001 I Street, 17th floor Sacramento, CA 95814-2828

Donna Drogos, ACEH Jerry Wickham, ACEH File









ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

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

April 11, 2006

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

Subject: Fuel Leak Case No.

Shell#13-5243, 11989 Dublin Blvd., Dublin, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site and the document entitled, "Initial Site Conceptual Model (February 2006)," dated February 21, 2006, prepared on behalf of Shell by Delta Environmental Consultants, Inc. The Initial Site Conceptual Model includes recommendations and a work plan to install, develop, and sample one monitoring well in first-encountered groundwater and one monitoring well in a water-bearing zone approximately 60 feet below ground surface. ACEH concurs with the proposed scope of work.

We request that you 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 REPORT REQUEST

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

- July 17, 2006 Quarterly Monitoring Report for the Second Quarter 2006
- August 24, 2006 Monitoring Well Installation Report
- October 16, 2006 Quarterly Monitoring Report for the Third Quarter 2006
- January 15, 2007 Quarterly Monitoring Report for the 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.

Mr. Denis Brown April 11, 2006 Page 2

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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.

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Mr. Denis Brown April 11, 2006 Page 3

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

Sincerely,

*le*rry Wiekham, P.G.

Hazardous Materials Specialist .

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: R. Lee Dooley 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

Donna Drogos, ACEH Jerry Wickham, ACEH File





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ENVIRONMENTAL HEALTH SERVICES

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January 17, 2006

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

Subject: Fuel Leak Case No



Shell#13-5243, 11989 Dublin Blvd., Dublin, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the document entitled, "Quarterly Monitoring Report – Fourth Quarter 2005," dated January 15, 2006, prepared on behalf of Shell by Delta Environmental Consultants, Inc. The report presents the results of quarterly groundwater monitoring conducted in November 2005. The report also requests that the fuel oxygenates DIPE, ETBE, and TAME be eliminated as analytes from future monitoring. Based on the absence of detections of these chemicals in previous groundwater results, ACEH concurs with eliminating DIPE, ETBE, and TAME as analytes during future groundwater monitoring.

TECHNICAL REPORT REQUEST

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

- February 21, 2006 Soil and Groundwater Investigation Report (presentation of results in the site conceptual model format is encouraged)
- May 17, 2006 Quarterly Report for the First 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.

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

Sincerely,

Jerry Wiskham, P.G.

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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

Donna Drogos, ACEH Jerry Wickham, ACEH · File



Wickham, Jerry, Env. Health

From:

Wickham, Jerry, Env. Health

Sent:

Thursday, November 03, 2005 6:35 PM

To:

'Lee Dooley'

Cc:

Brown, Denis L SOPUS-OP-COR-H; Rebecca Wolff

Subject: RE: Shell Station, 11989 Dublin Blvd., Dublin

Lee,

Putting the on and off-site data together in one update would be better. Let's extend the due date for the submittal to February 21, 2006.

Regards,

Jerry Wickham Hazardous Materials Specialist Alameda County Environmental Health 1131 Harbor Bay Parkway Suite 250 Alameda, CA 94502-6577 510-567-6791 phone 510-337-9335 Fax jerry.wickham@acgov.org

From: Lee Dooley [mailto:ldooley@deltaenv.com] Sent: Thursday, November 03, 2005 4:25 PM

To: Wickham, Jerry, Env. Health

Cc: Brown, Denis L SOPUS-OP-COR-H; Rebecca Wolff Subject: FW: Shell Station, 11989 Dublin Blvd., Dublin

We have finally obtained access to the "Hooter's" property downgradient of the Shell station. We have completed CPT-1, CPT-4, and CPT-6 and will drill GP-3 tomorrow. We also drilled four borings adjacent to the UST complex prior to its removal/replacement. CPT drill rigs are hard to schedule. The first open date for Gregg's CPT rig is December 19 and 20. We will install Well MW-5 on December 19th. CPT borings CPT-2, CPT-3, and CPT-5, located on the Hooters property, will be drilled on December 19 and 20.

My question is, do you want me to update the e-SCM with the current data by the report due date of 12/2/05 or should we wait and submit one updated e-SCM with all the on- and off-site data in late January 2006? Call me if you have any questions. Thanks.

R. Lee Dooley DELTA ENVIRONMENTAL CONSULTANTS, INC. 175 Bernal Road, Suite 200 San Jose, CA 95119 Phone: 408.826.1880 [Note New Number]

Cell: 408.656.2505

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----Original Message----

From: Lee Dooley

Sent: Monday, October 24, 2005 12:49 PM **To:** Jerry Wickham (jerry.wickham@acgov.org)

Cc: 'Brown, Denis L SOPUS-OP-COR-H'; Rebecca Wolff Subject: Shell Station, 11989 Dublin Blvd., Dublin

In my email to you dated 9/7/05, I indicated that we were having problems getting access to the property across San Ramon Road from the station ("Hooters" property). We have made progress but I still do not expected a signed agreement from all parties for at least two weeks. I am going ahead with the other work and then will later submit an addendum to our November 22, 2005 report for work on the Hooter's property. We are scheduled to drill CPT-1, CPT-4, and CPT-6 on November 1 and GP-3 on November 4 (see attached map). In addition, our report will contain the logs for the four borings drilled adjacent to the USTs before they were removed in September. We will also summarize the soil analytical results from the UST, piping, and dispenser removals.

Please call if you have any questions or would like to meet on site during drilling. Thanks.

R. Lee Dooley DELTA ENVIRONMENTAL CONSULTANTS, INC. 175 Bernal Road, Suite 200 San Jose, CA 95119 Phone: 408.826.1880 [Note New Number]

Cell: 408.656.2505

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Wickham, Jerry, Env. Health

From:

Lee Dooley [Idooley@deltaenv.com]

Sent:

Monday, October 24, 2005 12:49 PM

To:

Wickham, Jerry, Env. Health

Cc:

Brown, Denis L SOPUS-OP-COR-H; Rebecca Wolff

Subject:

Shell Station, 11989 Dublin Blvd., Dublin

Attachments: Figure 2 - Boring Location Map.pdf

In my email to you dated 9/7/05, I indicated that we were having problems getting access to the property across San Ramon Road from the station ("Hooters" property). We have made progress but I still do not expected a signed agreement from all parties for at least two weeks. I am going ahead with the other work and then will later submit an addendum to our November 22, 2005 report for work on the Hooter's property. We are scheduled to drill CPT-1, CPT-4, and CPT-6 on November 1 and GP-3 on November 4 (see attached map). In addition, our report will contain the logs for the four borings drilled adjacent to the USTs before they were removed in September. We will also summarize the soil analytical results from the UST, piping, and dispenser removals.

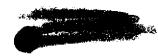
Please call if you have any questions or would like to meet on site during drilling. Thanks.

R. Lee Dooley DELTA ENVIRONMENTAL CONSULTANTS, INC. 175 Bernal Road, Suite 200 San Jose, CA 95119

Phone: 408.826.1880 [Note New Number]

Cell: 408.656.2505

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Wickham, Jerry, Env. Health

From:

Wickham, Jerry, Env. Health

Sent:

Monday, October 17, 2005 5:30 PM

To:

'Debbie Arnold'

Subject: RE: 11989 Dublin Blvd., Dublin - Tank Pull Over-Ex

Hi Debbie.

Since the soil contamination is probably related to a URR already on file, I do not see a need to prepare a new URR.

Regards,

Jerry Wickham Hazardous Materials Specialist Alameda County Environmental Health 1131 Harbor Bay Parkway Suite 250 Alameda, CA 94502-6577 510-567-6791 phone 510-337-9335 Fax

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Friday, October 14, 2005 4:35 PM

To: Wickham, Jerry, Env. Health

jerry.wickham@acgov.org

Subject: 11989 Dublin Blvd., Dublin - Tank Pull Over-Ex

Hi Jerry -

Should Shell/Delta file a Leak Report (URR) for the contaminated soil excavated from the base of the UST

I did not previously file one during the over-ex activities in August as the site is already a LUFT case managed by the County, and the observed soil contamination likely represents the same release as the groundwater case.

At your request, I can retroactively file a URR citing the soil data from the tank pit samples.

Please let me know what you would prefer.

Thank you,

Please note my new direct line phone number below

Debbie Arnold **Project Geologist**

Delta Environmental Consultants, Inc.

Ph: 408-826-1873 Fax: 408-225-8506

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

June 1, 2005

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

Subject: Fuel Leak Case No. [

iell#13-5243, 11989 Dublin Blvd., Dublin, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the work plan entitled, "Soil and Groundwater Investigation Work Plan," dated February 28, 2005, prepared on behalf of Shell by Delta Environmental Consultants, Inc. The work plan was submitted in response to correspondence from ACEH dated December 29, 2004 that requested definition of the horizontal and vertical extent of petroleum hydrocarbons and fuel oxygenates in groundwater beneath and downgradient of the site. The work plan was also discussed during a meeting on May 31, 2005 in the ACEH offices between Denis Brown of Shell, Lee Dooley and Debbie Arnold of Delta Environmental Consultants, Inc., and Donna Drogos and Jerry Wickham of ACEH.

Based on staff review of the document referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below. The technical comments are to be addressed prior to conducting the work and documentation is to be provided in the Soil and Groundwater Investigation Report requested below. Please provide 72-hour advance notification to ACEH prior to initiating field sampling activities.

TECHNICAL COMMENTS

1. Groundwater in Well MW-1. Groundwater elevations are approximately 15 feet higher in upgradient well MW-1 than in downgradient well MW-2. Shallow groundwater in well MW-1 is described in the work plan as an "anomalous perched groundwater zone." No contaminants have been detected in well MW-1 since groundwater monitoring began in 1999. The source and extent of the apparent perched water zone is unknown; however, this zone was apparently not encountered in the eastern portion of the site. Well MW-1 is located west (upgradient) of the dispenser island. ACEH is concerned with the potential for shallow groundwater from the apparent perched zone to move vertically through the vadose zone in the source area and cause increased contaminant flux to groundwater in the source area. The increased contaminant flux would likely result in greater horizontal and vertical expansion of the plume. ACEH requests that the potential for the shallow perched zone to affect contaminant transport at the site be assessed. The steps described in comments 2 through 4 are to be implemented to help assess the significance of the perched zone.

- CPT Boring at Proposed Location of Geoprobe Boring GP-2. ACEH requests that a CPT boring be completed at the proposed location of Geoprobe boring GP-2 in lieu of Geoprobe boring GP-2. We request that the CPT boring be used to assess whether perched groundwater is present between approximately 8 and 23 feet below ground surface. If the CPT data indicate that perched groundwater is present, we request that a groundwater sample be collected from the first encountered groundwater and at a depth approximately 10 feet below the first encountered groundwater. Stratigraphic intervals with coarser grained soils should be targeted for sampling. ACEH requests that the CPT boring be completed to a minimum depth of 30 feet below ground surface (bgs). If perched groundwater is not encountered at this location, a groundwater sample is to be collected from a zone between the first encountered groundwater and the total depth of 30 feet bgs. The groundwater samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and fuel oxygenates using EPA method 8260B and TPH as diesel (TPHd) using EPA method 8015M. If a groundwater sample is collected from a potential perched water zone between 8 and 23 feet below ground surface, ACEH requests that the sample also be analyzed for trihalomethanes. The results are to be presented in the Soil and Groundwater Investigation Report requested below.
- 3. Water Lines. As discussed during the May 31 meeting, ACEH concurs that water lines on the site be located and plotted on a map to assess the potential for leaking water lines to discharge water to the perched zone detected in well MW-1. In addition, please research and report on other evidence of water line leakage such as excessive water usage on site. Please present these results in the Soil and Groundwater Investigation Report requested below.
- 4. Sampling for Trihalomethanes. ACEH requests that a groundwater sample be collected from well MW-1 and analyzed for trihalomethanes to assess whether water treatment byproducts are present in the perched groundwater zone. Please present these results in the Soil and Groundwater Investigation Report requested below.
- 5. CPT Borings to Replace Proposed Geoprobe Borings GP-4 and GP-5. ACEH requests that CPT borings be completed in lieu of proposed Geoprobe borings GP-4 and GP-5. As discussed during the May 31, 2005 meeting, the CPT borings should be moved in a west southwest direction and placed as close as practicable to San Ramon Road to form a transect with proposed boring CPT-2 that is perpendicular to groundwater flow. The CPT borings are to be completed and groundwater samples collected as described in Task 5 Cone Penetration Test Boring of the work plan.
- Hydrogeologic Cross Sections. Please incorporate data from the CPT borings into a
 minimum of two cross sections that are parallel and perpendicular to groundwater flow.
 Please present the cross sections in the Soil and Groundwater Investigation Report
 requested below.
- 7. Quarterly Groundwater Monitoring. ACEH concurs with the recommendation to sample wells MW-2, MW-3, MW-4, and proposed well MW-5 on a quarterly basis. ACEH also concurs that quarterly groundwater monitoring of well MW-1 should be discontinued. However, well MW-1 should not be destroyed until the assessment of the perched zone described in steps 2 through 4 is completed.

 Site Conceptual Model. As discussed during the May 31, 2005 meeting between ACEH, Shell, and Delta Environmental, ACEH encourages application of an electronic site conceptual model format for reporting. The use of this format, which was provided on CD to Delta Environmental Consultants during the May 31, 2005 meeting, is encouraged but not mandatory.

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
- October 14, 2005 Soil and Groundwater Investigation Report (presentation of results in the site conceptual model format is encouraged)
- October 17, 2005 Quarterly Report for the Third Quarter 2005
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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.

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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: R. Lee Dooley
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 **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

December 29, 2004

Karen Petryna Shell Oil Products US 20945 S. Wilmington Ave. Carson, CA 90810

Subject:

Fuel Leak Case No. RO0000213, Shell #13-5243, Active Service Station at

11989 Dublin Blvd., Dublin, California – Workplan Request

Dear Ms. Petryna:

Alameda County Environmental Health (ACEH) has reviewed your November 3, 2004 *Unauthorized Release Report* and the case file for the above-referenced site. On October 29, 2004, a recent release was reported by Shell. According to the URR, Shell emptied a site UST on October 26, 2004; the Afforda-Test report attached to the URR states that the UST had "an obvious leak." Subsurface investigation, including quarterly groundwater monitoring, has been ongoing at the site since August 1997. A release was first discovered at the site on July 2, 1997, when petroleum hydrocarbons were detected in soil beneath former fuel piping and dispenser locations. The most recent phase of investigation was in April 2003 when Shell performed downgradient groundwater sampling at multiple discrete depths. Up to 3,000 ug/L TPHg and 38 ug/L MTBE were detected downgradient of the site. The downgradient discrete-depth groundwater sample results suggest that contaminant concentrations increase with depth. During the most recent monitoring event conducted on July 22, 2004, up to 4,900 ug/L TPPH, 32 ug/L benzene, 19 ug/L ethylbenzene, 180 ug/L MTBE, and 7,100 ug/L TBA were detected in groundwater. Please submit a workplan for soil and groundwater investigation which addresses the technical comments below.

TECHNICAL COMMENTS

1. Release Assessment

We request that you propose investigation tasks to assess the magnitude and extent of the recent release and evaluate impact to soil and groundwater. As part of your workplan, include a scaled figure indicating the locations of the recent UST failures (both the overfill containment and UST recently required repairs) and the relative locations of your sampling points. Due to the shallow depth to groundwater and consideration of MTBE and TBA as contaminants of concern at the site, we request that you evaluate the potential impact to groundwater. We require that you define both the vertical and horizontal extent of source area contamination. Please present your evaluation and sampling plan in the workplan requested below.

2. Soil and Water Investigation

We request that you propose investigation tasks to fully define the three-dimensional extent of contamination in groundwater. Due to the observed increase in groundwater concentrations with depth in boring SB-3, additional vertical delineation is required both onsite and downgradient. Please describe your proposal for performing this investigation in the workplan requested below.

3. Regional Geologic and Hydrogeologic Study

We request that you perform a study of the regional geologic and hydrogeologic setting of your site by reviewing the available technical literature for the area. References for your review need to include regional geologic maps, United States Geological Survey (USGS) technical reports and documents, Department of Water Resources (DWR) Bulletins, Regional Water Quality Control Board reports on the groundwater basin, data from contaminant investigations in the area, etc. Please provide: 1) a concise narrative discussion of the regional geologic and hydrogeologic setting, 2) figure(s) summarizing your findings, and 3) synthesis and interpretation of regional data with the site-specific data. We request that you appropriately reference your findings, and that you present photocopies of regional geologic maps, groundwater contour maps, cross-sections, etc., to illustrate your results. Please report your results in the workplan requested below.

4. Groundwater Monitoring

No petroleum hydrocarbons or fuel oxygenates have been detected during quarterly monitoring of well MW-1; sampling and analysis was conducted for over 6 years. We recommend that you propose a modified sampling schedule, and that you consider discontinuing gauging and sampling of this well. After considering the results of your release assessment and soil and water investigation (Comments 1 and 2, above), we also recommend that you consider and propose modification of the monitoring frequency for wells MW-2 through MW-4. Please present your proposed monitoring frequency in the workplan requested below.

REPORT REQUEST

Please submit your *Soil and Water Investigation Workplan*, which addresses the comments above by **February 28, 2005**. ACEH makes this request pursuant to California Health & 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 a reportable unauthorized release from a petroleum UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735 and 7835.1) requires that workplans 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.

Perjury Statement

All workplans, 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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 or contact me via email at robert.schultz@acgov.org with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.

Robert W. S. Cu

Hazardous Materials Specialist

cc: Ana Friel, Cambria Environmental Technology, Inc., P.O. Box 259, Sonoma, CA 95476

Matt Katen, Zone 7 Water District, QIC 80201

Donna Drogos, ACEH Robert W. Schultz, ACEH

Afforda-Test 🗞

PO Box 36

26515 N. Sacramento Blvd

Thornton, Ca. 95686

209 794-0102

Fax 209 794-0112

Site Name	SHELL	OIL =	± 511722
Address	11989	DUBUN	BLVD
2	Dubun	, Cx	94568

(925) 828-2770

Equipment:

EZY 3 LOCATOR PLUS

Test Date 12/13 / 04

Tank #

Tank Product 89

Phone

Ullage 9728 Volume Tank Size 9728

PRESSURE SENSOR CALCULATION

Prod.	X	Prod. Wt ,026	_ ⇒	PSI (1)	
" Water				PSI	

<u>(3)</u> – 🔿 (1) + (2) = Positive Head Pressure in Tank = PSI

Outside Tank 75" X .036 (4) *\(\partial\)* .70

PSI - 2.70 +/-(3)Hd Pressure - (4) Outside Water Pressure =

 $(5)^{-}$ $\frac{7}{2}$ $\frac{7}{2}$ + .5 PSI

 $= \frac{RSI}{(7)} - 2 \cdot 20 + /-$ TEST PRESSURE If (6) is less than .5 PSI, (7) shall be .5 PSI ,50

WATER SENSOR CALIBRATION

Cal #1 ____ Cal #2 ____ Cal #3 ____ AVERAGE:

Began 1048 ,7 Water Intrusion Test Period: Ended 118 ,6,

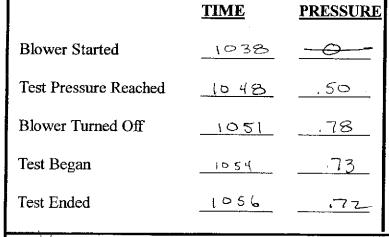
Test Period Calculation:

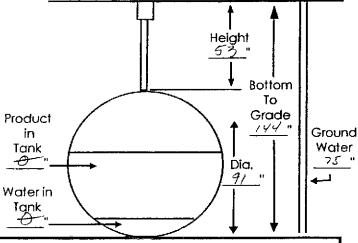
$$\frac{1}{Avg}$$
 / 3780 = $\frac{1}{Avg}$ / .05 = $\frac{30 \text{ m/s}}{Test Time}$

Groundwater Depth Determination:

By: TESTER

Where or How: WATER WELL





PASS	PERFECT	-Y Qui	Ke mit
FAIL	W/No	WATER	1 NTV K STOR
U	lage (Dry)		

Product Level (Wet)

INCONCLUSIVE

Water Intrusion____No Water_ Technician: Zane Nimmo

Water Sensor Indication:

Signature: / / 7 OTTL# 04/1676

Schultz, Robert, Env. Health

From:

Hugo, Susan, Env. Health

Sent:

Thursday, November 04, 2004 2:09 PM

To:

Drogos, Donna, Env. Health; Schultz, Robert, Env. Health; Chan, Barney, Env. Health; Weston,

Robert, Env. Health

Cc:

Levi, Ariu, Env. Health

Subject:

RE: 11989 dublin, Dublin - Afforda Test

Importance: High

I have revised our tank modification application form page 2 item # 13 (comply with Article 5 and 11). Comments ?

----Original Message----

From: Hugo, Susan, Env. Health

Sent: Thursday, November 04, 2004 12:35 PM

To: Drogos, Donna, Env. Health; Schultz, Robert, Env. Health; Chan, Barney, Env. Health

Cc: Levi, Ariu, Env. Health

Subject: FW: 11989 dublin, Dublin - Afforda Test

Importance: High

FYI

11989 DUBLIM RO # 213.

-----Original Message-----

From: Sibley, Aura B SOPUS [mailto:ABSibley@ShellOPUS.com]

Sent: Wednesday, November 03, 2004 3:09 PM

To: Weston, Robert, Env. Health; Hugo, Susan, Env. Health

Cc: Merchant, Bill R SOPUS

Subject: 11989 dublin, Dublin - Afforda Test

Importance: High

Susan - per our discussion today...

Rob - per my phone messages, we followed up with a presion tank test at 11989 Dublin Blvd., Dublin. Afforda-Test was not able to get to the site to test until Friday late afternoon on 10/29/04. According to Afforda-Test, the test failed on the Regular Tank. We still have it out of service and are reviewing correction options at this time. Our Engineer, Bill Merchant should be contacting you or one of his Contractors upon your return from vacation.

Also, I went ahead a completed a form 5 due to the results on Friday - please see the attached Form 5 and Afforda-Test for your review.

Hope your having a great vacation. Call me when you return! Take care.

<<11989 Dublin135243 Form 5 signed 03NOV04.pdf>> <<04.pdf>>

Aura Sibley Sr. Compliance Coordinator - East Bay 1635 Pacheco Blvd., Martinez, Ca 94533 916-240-1610 cell and office 707-452-8947 fax

UNDERGROU	ND STORAGE TANK UNAUTHORIZ	ED RELEASE (LEAK) CONTAMINATION SITE REPORT
EMENCIENCY CO X NC	HEPORT SEEMPLED : YES (MO	FOR LOCAL AGENCY USE ONLY 1 HEREBY CERTEY THAT I MANE O'STRIBUTED THIS IMPORTATION ACCORDING TO THE DISTRIBUTION SHOWN CONTHE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.
I AL OF ON NOVINALE		SGATE!
	SIBLEY 910 PROMEMOREHADIN TO REGIONAL BOARD	5/240-1610 Stua Schlief for Sories Shell Och Products U3
MANUE STILL	Del Product L'Sunknown	CURSON CUSTON 90810 CONTAST MERSON PHENE PRINE 1916/210-1610
FACILITY NAME (F APP ACCURES: 11 9 8 9 15 CHOSES STRUCT	Runded Service State Runded Service State Ramin Road	Ben Marphond 915 878-2778 Dullen Damoda
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Busid on Borferma Afforda Jes	preliminary Vero tion pricision text it could not do fest r	entil 10/29; tank was sometied on 10/16

INCONCLUSIVE

Afforda-Test		Site Name SHEW OLL 51172Z
		Address 11989 Dublin Bun
	515 N. Sacramento Bl	vd
 	, Ca. 95686 Fax 209 794-013	DuBLIN, CA 94568
		Phone 925 - 878 - 2770
Equipment: EZY 3 LOC	CATOR PLUS	Test Date 10 129 104
Tank # Tank P	150 LATED Troduct TANK 89 VIllag	re 9074 Volume 654 Tank Size 9728
PRESSURE SENS	OR CALCULATION	WATER SENSOR CALIBRATION
Prod. 5" X Wt	ochect track pro- 1976= 5 1026 = (1) 13	Cal #1 Cal #2 Cal #3
in Tank O X	$.036 = {}^{PSI}_{(2)} - {}^{O}$	AVERAGE: NA
(1) + (2) = Positive Head Pressu	DCT	Water Intrusion Test Period: Began
Outside Tank 75 X	.036 = (4) 2.70	Ended
(3)Hd Pressure - (4) Outside War	$_{\text{ter Pressure}} = \frac{PSI}{(5)} - 2.57$	+/- Test Period Calculation:
(5) $-2.57 + .5 PSI$	PSI + (6) ,50	$\frac{\cancel{Avg}}{Avg} / 3780 = \frac{\cancel{30mid}}{\text{"A" Factor}} / .05 = \frac{\cancel{30mid}}{\text{Test Time}}$
TEST PRESSURE If (6) is less than .5 PSI, (7)		
	(.50	Where or How: Surthant Syon tank, water we
	TIME PRESSU	
Blower Started	1419 -	Ouer, Height 53."
Test Pressure Reached	1423 50	Boltom
Blower Turned Off	1424 52	Product Grade in Ground Water
Test Began	1424 .48	Dia. 75
Test Ended	1426 .31	Water in Tank
PASS TANK H	LEAK DOESN'T STATE 31 PSI, LEAK ALSO SE LIKE IT IS ABOVE TABLE BY TANK	Water Sensor Indication: /Nconccus; VE
Ullage (Drv)	LIKE IT IS ABOVE	WATER Intrusion No Water N/A
Product Leve	TABLE PT TANK	Technician: Zane Nimmo

Signature: / a / OTTL# 04-1676

MEMORANDUM

September 30, 2004

To: Mr. Bob Schultz, Alameda Health Care Services Agency

From: Tom Graf, Jennifer Patterson

Subject: Toxic Case No. RO0002619, 4226 Halleck Street, Emeryville, CA

Holliday Development received your letter of September 7, 2004 detailing Technical Comments on reports submitted to you for the subject site. In order to complete the requested summary report of site assessment and cleanup results and address the Technical Comments, we believe that additional sampling will be required. The following outlines how we anticipate addressing the Technical Comments, including additional sampling and analyses.

1. Documentation

All available documents, including boring logs, analytical reports, manifests, etc. will be included in the summary report.

key point – Tom Graf is using previously generated information to characterize the site. Some of the information that supports Mr. Graf's conclusions has not been presented in final format. The final report needs to be very clear about which data is considered in the final evaluation and which data can not be substantiated. Unsubstantiated data which point towards interpretations other than those proposed by Mr. Graf cannot be discarded, and instead must be reconfirmed in the field.

2. Source and Lateral Definition

Based on available data, it is unlikely that the source of the black sand fill will be identified.

Please present a spatial description of the fill. Was the fill metals/PNA impacted when it was emplaced? Does the data indicate that the fill was well-mixed, so that PNAs and metals were uniformly distributed throughout the black sand? A conceptual model of how the contaminated fill was emplaced (e.g. series of truck loads? spread/graded?

Three borings will be located along the western excavation boundary to provide additional data documenting the extent of excavation. Samples will be collected just above the organic clay layer at a depth of approximately 2.5 to 3 feet. Eight borings will be advanced along the eastern and southeastern boundary of excavation to document removal of the black sand and to address questions regarding arsenic and lead concentrations in the eastern portion of the site (see #6). Samples will be collected at depths of 2.5 to 3 feet, or just above the organic clay layer.

3. Confirmation Sample Analytes

Review of previous sample analysis results for the black sand indicates six metals with elevated concentrations. These six metals, As, Ba, Cd, Cu, Pb, and Zn will be included in sample analyses. Since PAHs were in the fill, and since there is no analysis of the distribution of the various chemicals within the fill (i.e. we do not

know if arsenic concentrations are consistently proportional to PAH cones) there is concern that fill sands containing low arsenic, but high PAHs could remain at the site. References for documentation of the limited ability for PNAs to leach under site conditions will be provided in the summary report.

4. Representative Concentrations

Evaluation of the variability of soil data and potential for any of the chemicals of concern to exceed the cleanup levels will be evaluated in the summary report.

5. Excavation Backfill Removal

Backfilled overburden was removed down to the organic clay layer after sampling indicated that it contained concentrations of arsenic above allowable levels. We are concerned that all of the backfill may not have been removed, please address this concern. Additional information detailing field activities and subsequent backfilling will be provided in the summary report.

6. Arsenic and Lead Concentrations in East Site

As indicated in #2 above, 8 borings will be advanced along the eastern and southeastern excavation boundary, addressing samples S-1, S-2, And S-3, and sample grid A4.

Memorandum to Bob Schultz Alameda County Health Care Services Agency September 30, 2004 Page 2

7. Cleanup Goals

We have recently received RWQCB-approved cleanup concentrations for a nearby site in Oakland along Wood Street. Information on the selection of cleanup concentrations will be included in the summary report. Please provide this data as soon as possible so we have time to review it. ACEH is overseeing this site cleanup under authority of Health & Safety Code. In determining appropriate cleanup goals for the site, we look to multiple guidance sources, including RWQCB, DTSC and USEPA.

8. Hydrocarbons and Metals in Groundwater

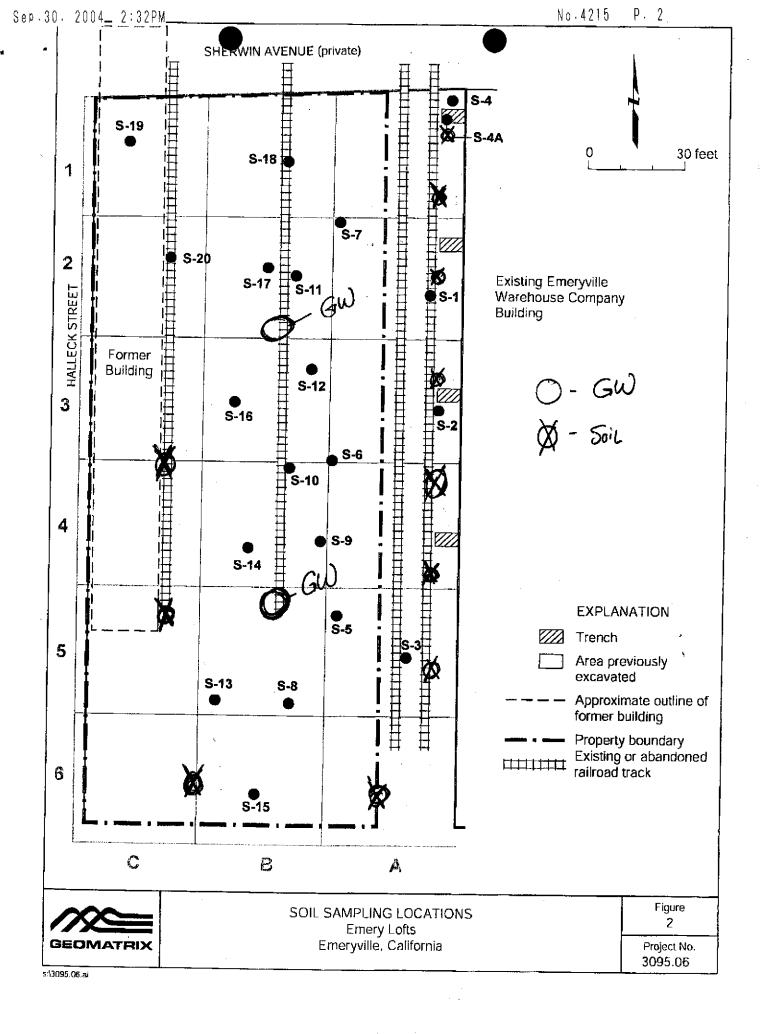
Given the previous detection of a low concentration of TPH-g in groundwater at the northwestern corner of the site, two groundwater samples will be collected to assess the potential for concentrations of BTEX, the toxic constituents of gasoline. Since the future likely use of shallow groundwater in Emeryville is highly unlikely, and the concentrations of metals found in site groundwater to-date are relatively low, additional analysis of groundwater for metals is not recommended for the summary report. This response is not sufficient. We recommend that you evaluate the distribution of the detected contaminants.

A figure showing recommended sampling locations is included with this Memorandum by fax. As we have discussed, we would appreciate your input on our approach prior to proceeding with the sampling program. If you have any questions, please call me at (415) 290-5034, or Jennifer Patterson at (510) 663-4167.

To: Company: Fax:	Bob Schu ACHCSA		From: Tom Graf	
	pages including co	over page: 2 (If you did	not receive all pages please call)	
□Urgent	For Review	☐ Please Comment	☐Please Reply By:	

Figure to go along with sampling memo

The documents in this telecopy transmission contain information which is confidential and privileged. The information is intended to be for the use of the individual or entity named on this transmission sheet. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this telecopied information is prohibited. If you received this telecopy in error, please notify us so that we can arrange for the retrieval of the documents at no cost to you.



ALAMEDA COUNTY HEALTH CARE SERVICES





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

RO0000213

August 30, 2002

Ms. Karen Petryna Equiva Services P.O. Box 7869 Burbank, CA 91501-7869

RE: Work Plan Approval for 11989 Dublin Blvd., Dublin, CA

Dear Ms. Petryna:

I have completed review of Cambria's July 2002 *Subsurface Investigation Work Plan Addendum* and Cambria's August 2002 *Second Quarter 2002 Monitoring Report* prepared for the above referenced site. The proposal to install three soil borings downgradient of well MW-4 to determine the best location for a potential downgradient monitoring well is acceptable with the following changes/additions:

- Groundwater samples should also be collected at each change in lithology
- The depth explored should delineate the vertical extent of the MTBE plume (you may need to explore beyond the proposed 35 feet bgs)
- There is a fault running north/south of the site, which accounts for the discrepancy in groundwater elevation east and west of the property. Would the proposed boring in the vicinity of well MW-1 provide needed information?

Field work should commence within 60 days of the date of this letter, **or by November 4, 2002.** A report documenting this work should include geologic cross sections. If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Jacquelyn Jones (Cambria)

shell11989-10



June 5, 2002

Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502



î.

RE: EQUILON ENTERPRISES LLC / Equiva Services LLC dba SHELL OIL PRODUCTS US

Dear Sir or Madam:

The Shell purchase of Texaco's interest in Equilon Enterprises LLC and Equiva Services LLC has been approved by government authorities and was completed in early February.

Please be advised that effective March 1, 2002, Equilon Enterprises LLC and Equiva Services LLC will begin doing business as (DBA) "Shell Oil Products US." Since Equilon Enterprises LLC will remain the owner and/or the responsible Party of remediation activities at 11989 Dublin Boulevard, Dublin, California, no changes are needed or requested for permits.

If you have any questions please contact Ms. Karen Petryna at 559.645.9306.

Yours truly,

Karen Petryna

Sr. Environmental Engineer



State Water Resources Control Board

Division of Clean Water Programs

1001 I Street • Sacramento, California 95814 P.O. Box 944212 • Sacramento, California • 94244-2120 (916) 341-5714 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf



Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.

September 18, 2001

Shell Oil Company Equiva Services LLC Deborah Pryor P O Box 7869 Burbank, CA 91510-7869

SEP 2 4 2001

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), NOTICE OF ELIGIBILITY DETERMINATION: CLAIM NUMBER 016724; FOR SITE ADDRESS: 11989 DUBLIN BLVD, DUBLIN

Your claim has been accepted for placement on the Priority List in Priority Class "D" with a deductible of \$10,000.

We have completed our initial review. The next step in the claim review process is to conduct a compliance review.

Compliance Review: Staff reviews, verifies, and processes claims based on the priority and rank within a priority class. After the Board adopts the Priority List, your claim will remain on the Priority List until your Priority Class and rank are reached. At that time, staff will conduct an extensive Compliance Review at the local regulatory agency or Regional Water Quality Control Board. During this Compliance Review, staff may request additional information needed to verify eligibility. Once the Compliance Review is completed, staff will determine if the claim is valid or must be rejected. If the claim is valid, a Letter of Commitment will be issued obligating funds toward the cleanup. If staff determine that you have not complied with regulations governing site cleanup, you have not supplied necessary information or documentation, or your claim application contains a material error, the claim will be rejected. In such event, you will be issued a Notice of Intended Removal from the Priority List, informed of the basis for the proposed removal of your claim, and provided an opportunity to correct the condition that is the basis for the proposed removal. Your claim will be barred from further participation in the Fund, if the claim application contains a material error resulting from fraud or intentional or negligent misrepresentation.

Record keeping: During your cleanup project you should keep complete and well organized records of all corrective action activity and payment transactions. If you are eventually issued a Letter of Commitment, you will be required to submit: (1) copies of detailed invoices for all corrective action activity performed (including subcontractor invoices), (2) copies of canceled checks used to pay for work shown on the invoices, (3) copies of technical documents (bids, narrative work description, reports), and (4) evidence that the claimant paid for the work performed (not paid by another party). These documents are necessary for reimbursement and failure to submit them could impact the amount of reimbursement made by the Fund. It is not necessary to submit these documents at this time; however, they will definitely be required prior to reimbursement.

Compliance with Corrective Action Requirements: In order to be reimbursed for your eligible costs of cleanup incurred after December 2, 1991, you must have complied with corrective action requirements of Article 11, Chapter 16, Division 3, Title 23, California Code of Regulations. Article 11 categorized the

California Environmental Protection Agency



corrective action process into *phases*. In addition, Article 11 requires the responsible party to submit an *investigative workplan/Corrective Action Plan* (CAP) before performing any work. This phasing process and the workplan/CAP requirements were intended to:

- 1. help the responsible party undertake the necessary corrective action in a cost-effective, efficient and timely manner;
- 2. enable the regulatory agency to review and approve the proposed cost-effective corrective action alternative before any corrective action work was performed; and
- 3. ensure the Fund will only reimburse the most cost-effective corrective action alternative required by the regulatory agency to achieve the minimum cleanup necessary to protect human health, safety and the environment.

In some limited situations *interim cleanup* will be necessary to mitigate a demonstrated immediate hazard to public health, or the environment. Program regulations allow the responsible party to undertake interim remedial action after: (1) notifying the regulatory agency of the proposed action, and; (2) complying with any requirements that the regulatory agency may set. Interim remedial action should only be proposed when necessary to mitigate an immediate demonstrated hazard. *Implementing interim remedial action does not eliminate the requirement for a CAP and an evaluation of the most cost-effective corrective action alternative*.

Three bids and Cost Preapproval: Only corrective action costs required by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. You must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work. If you do not obtain three bids or a waiver of the three bid requirement, reimbursement is not assured and costs may be rejected as ineligible.

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

ORIGINAL SIGNED BY

Shari Knieriem Claims Review Unit Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse RWQCB, Region 2 1515 Clay Street, Ste. 1400 Oakland, CA 94612 Ms. Susan Hugo Alameda County EHD 1131 Harbor Bay Pkway, 2nd Fl. Alameda, CA 94502-6577

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

R00000213

April 20, 2001

Ms. Karen Petryna Equiva Services P.O. Box 7869 Burbank, CA 91501-7869

RE: Work Plan Approval for 11989 Dublin Blvd., Dublin, CA

Dear Ms. Petryna:

I have completed review of Cambria's April 2001 report, *Offsite Investigation Work Plan*, prepared for the above referenced site. An offsite monitoring well is proposed across San Ramon Road that will help to delineate the extent of the contaminant plume. The work plan is acceptable, but it is recommended that the well be relocated approximately 60 to 80 feet south of the proposed location. This recommendation is based on the consistent easterly groundwater flow direction at the site.

The work plan should be implemented within 90 days of the date of this letter, or by July 23, 2001. Please provide 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Barbara Jakub, Cambria

Chu, Eva, Public Health, EHS

From:

Barbara Jakub[SMTP:bjakub@cambria-env.com] October 11, 2000 9:26 AM Chu, Eva, Public Health, EHS 'kepetryna@equiva.com'; sbork@cambria-env.com Re: 11989 Dublin Blvd., Dublin, CA

Sent: To:

Cc:

Subject:

eva,
We ran 8260 for oxygenates in the second quarter.
MTBE was confirmed at 28,000 ppb, tert-butyl alcohol was detected at 10,500 ppb and tert_Amyl methyl ether was detected at 32.7 ppb. No other oxygenates were detected. Barbara Jakub

At 11:35 AM 10/4/00 -0700, Chu, Eva, Public Health, EHS wrote: >Hi Barbara,

>For the next groundwater sampling event, please confirm oxygenates (TBA, >DIPE, TAME, etc) using Method 8260 on water from Well MW-2. Thanks.

>

Chu, Eva, Public Health, EHS

From: Sent:

To:

Chu, Eva, Public Health, EHS October 04, 2000 11:35 AM 'bjakub@cambria-env.com' 'kepetryna@equiva.com' 11989 Dublin Blvd., Dublin, CA

Cc: Subject:

Hi Barbara,

For the next groundwater sampling event, please confirm oxygenates (TBA, DIPE, TAME, etc) using Method 8260 on water from Well MW-2. Thanks.

AGENCY





ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

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

DAVID J. KEARS, Agency Director

StID 4109

September 6, 2000

Ms. Karen Petryna **Equiva Services** P.O.Box 7869 Burbank, CA 91501-7869

RE: Offsite Investigation for 11989 Dublin Blvd., Dublin, CA

Dear Ms. Petryna:

I have completed review of Cambria's August 2000 Second Quarter 2000 Monitoring Report prepared for the above referenced site. Groundwater monitoring conducted in April 2000 revealed that Well MW-2 contained 28,000ppb MTBE, 10,500ppb TBA, and 32.7ppb TAME using EPA Method 8260. MTBE concentrations appear to be increasing at Well MW-2.

At this time, an offsite investigation should be conducted to delineate the extent of the contaminant plume. A workplan for the next phase of investigation is due within 60 days of the date of this letter, or by November 9, 2000. In addition, to confirm the detection of oxygentates, the next sampling event should again include the analysis for oxygenates using Method 8260.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Barbara Jakub (bjakub@cambria-env.com)

AGENCY



DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

StID 4109

March 6, 2000

Ms. Karen Petryna Equiva Services P.O.Box 7869 Burbank, CA 91501-7869

RE: Oxygenate Analysis for 11989 Dublin Blvd., Dublin, CA

Dear Ms. Petryna:

I have completed review of Cambria's February 2000 reports entitled Fourth Quarter 1999 Monitoring Report and Well Installation Report prepared for the above referenced site. The quarterly monitoring report summarized the groundwater sampling event that took place in October 1999. Groundwater from Well MW-2 contained MTBE at concentrations that is one order of magnitude greater than the previous sampling quarter. For the next sampling event, please analyze/confirm MTBE and other oxygenates using Method 8260.

The well installation report summarized the installation of three groundwater monitoring wells at the site in June 1999. Be advised that technical reports should be submitted in a timely manner, no later than 90 days upon completion of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

email: Darryk Ataide (dataide@cambria-env.com)

CAMBRIA

November 23, 1999

Ms. Eva Chu Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, 2nd Floor Alameda, California 94502

Re: Certified List of Record Fee Title Owners for:

Shell-branded Service Station 11989 Dublin Blvd. Dublin, CA Incident No. 98995328

Dear Ms. Chu:

In accordance with section 25297.15(a) of Chapter 6.7 of the Health Safety Code and on behalf of Equiva Services LLC, we certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site.

Equilon Enterprises LLC c/o Stewart Title Guaranty Company, 1980 Post Oak Blvd., Suite 110, Houston, TX 77056

Sincerely,

Ailsa S. Le May, R.G.

Senior Geologist

cc: Karen Petryna, Equiva Services LLC, P.O. Box 6249, Carson, California, 90749-6249

Oakland, CA Sonoma, CA Portland, OR Seattle, WA

Cambria Environmental Technology, Inc.

1144 65th Street Suite B Oakland, CA 94608 Tel (510) 420-0700 Fax (510) 420-9170





Zone 7 Alameda County Flood Control Sz Water Conservation District

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Sour Restaids Osive Pleasanton, California 94588-5127	Phone	(925)	484-2600	_	FAX	(323)	#0Z-0#17	•

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		Call: (925) 484-2600, Extension: Z90 Return Fax: (925) 462-3914	
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CONFIDENTIAL

STATE OF CALIFORNIA DWR WELL COMPLETION REPORT (WELL LOGS)

REMOVED

AGENCY



DAVID J. KEARS, Agency Director

StID 4109

April 26, 1999

Ms. Karen Petryna Equiva Services P.O.Box 6249 Carson, CA 90749-6249 ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

ENVIRONMENTAL HEALTH SERVICES

RE:

Work Plan Approval for 11989 Dublin Blvd, Dublin, CA

Dear Ms. Petryna:

I have completed review of Cambria's April 1999 *Monitoring Well Installation Work Plan* prepared for the above referenced site. The proposal to install three ground water monitoring wells to determine the extent of the contaminant plume at the site is acceptable. Field work should commence within 60 days of the date of this letter, or **by June 30**, 1999. Please notify me at least 72 hours prior to the start of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

c:

Darryk Ataide Cambria 1144 65th Street, Suite B Oakland, CA 94608

AGENCY





ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

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

DAVID J. KEARS, Agency Director

StID 4109

February 8, 1999

Ms. Karen Petryna Equiva Services P.O. Box 6249 Carson, CA 90749-6249

RE: Groundwater Monitoring Wells At 11989 Dublin Blvd, Dublin, CA

Dear Ms. Petryna:

I have completed review of Cambria's February 1999 Secondary Subsurface Investigation Report prepared for the above referenced site. Two Geoprobe borings were advanced southeast of the onsite tank complex. Soil and groundwater samples were collected from each boring. Elevated hydrocarbon concentrations were identified in the groundwater samples.

At this time, permanent groundwater monitoring wells are required to monitor groundwater quality beneath this site. Please submit a workplan detailing locations, and drilling, development, and sampling protocols for the planned monitoring wells. The workplan is due within 60 days of the date of this letter, or by April 16, 1999.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

shell 1-5

AGENCY





StID 4109

June 24, 1998

Mr. Alex Perez **Shell Oil Products** 501 Shell Ave Martinez, CA 94553 **ENVIRONMENTAL HEALTH SERVICES**

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

RE: Workplan Approval for 11989 Dublin Blvd, Dublin, CA

Dear Mr. Perez:

I have completed review of Cambria's June 1998 "Secondary Subsurface Investigation Workplan" for the above referenced site. The proposal to advance a Geoprobe boring downgradient of the underground storage tank complex to collect soil and groundwater samples is acceptable. If separate phase product or if field observations detect significant petroleum hydrocarbons in soil, then an additional boring will be advanced. Soil and groundwater will be analyzed for TPHg, TPHd, BTEX, and MTBE.

Field activities should commence within 60 days of the date of this letter. If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

c: Diane Lundquist

Cambria

1144 65th Street, Suite B

Oakland, CA 94608

AGENCY



DAVID J. KEARS, Agency Director

StID 4109

April 20, 1998

Mr. Alex Perez Shell Oil Products 501 Shell Ave Martinex, CA 94553 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700

FAX (510) 337-9335

Re: Groundwater Monitoring Well for 11989 Dublin Blvd, Dublin, CA

Dear Mr. Perez:

I have completed review of Cambria's February 1998 Subsurface Investigation Report for the above referenced site. This report documented the results of soil and groundwater samples collected from four soil borings (SB-1 through SB-4) advanced in the vicinity of the existing pump islands. Groundwater was encountered in only one of the borings, SB-2, at about 22 feet bgs.

The highest hydrocarbon concentration (300 ppm TPHd, 11 ppm TPHg, 0.005 ppm benzene, and 0.069 ppm MTBE) detected in soil was at ~25' bgs (at the capillary fringe or below groundwater elevation) from boring SB-3. Trace to non-detect levels of petroleum hydrocarbons were identified at 10' bgs (the vadose zone), suggesting that the source of contamination may not necessarily be from the dispenser or product lines. The grab groundwater sample contained 4,900 ppb TPHd, 470 ppb TPHg, 17 ppb benzene, and 370 ppb MTBE.

At this time, a permanent groundwater monitoring well should be installed downgradient (ESE) of the tank complex to verify that the USTs are not the source of groundwater contamination and to delineate the extent of the contaminant plume. A workplan for this phase of investigation is due to this office within 60 days of the date of this letter, or by June 20, 1998.

If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

c:

Scott MacLeod Cambria 1144 65 Street, Suite B Oakland, CA 94608

shell1-3



SHELL OIL PRODUCTS COMPANY

CALIFORNIA WATER QUARTERLY REPORT CALIFORNIA REGIONAL WATER QUALITY CONTROL

SAN FRANCISCO BAY REGION

Fourth Quarter 1997

WIC# 204-2277-0204 11989 Dublin Avenue City of Dublin County of Alameda

Remedial Action Status:

Only very low concentrations of TPHg have been detected in soil samples previously collected at this site.

Actions planned next 3 months:

No further activities are planned at this time.

Soil Contamination Defined?

Yes

Soil Cleanup in Progress?

No

Free Product Plume Defined?

NA

Free Product Cleanup in Progress?

NA

Dissolved Constituent Plume Defined?

NA

Contractor:

Cambria Environmental Technology, Inc.

NA = Not applicable.

3/11/98

Cambria

ENVIRONMENTAL

TECHNOLOGY, INC.

1144 65TH STREET,

SUITE B

OAKLAND,

CA 94608

Рн: (510) 420-0700

Fax: (510) 420-9170

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AGENCY



DAVID J. KEARS, Agency Director

StID 4109

October 21, 1997

Mr. Alex Perez Shell Oil Products 501 Shell Ave Martinez, CA 94553 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Workplan Approval for 11989 Dublin Blvd, Dublin CA

Dear Mr. Perez:

I have completed review of Cambria's October 1997 Preliminary Site Assessment Work Plan for the above referenced site. The proposal to advance at least four borings in the vicinity of the pump islands to collect soil and groundwater samples is acceptable. The following correction/addition should be noted:

- 1. the legend noted on Figure 1 should be reversed, ie, the initial borings should be nearest the pump islands and additional borings, if needed, are near the perimeter of the site; and,
- 2. analysis for PAHs should be performed if TPHd exceeds 5,000ppm in soil and 5,000ppb in groundwater.

Field work should commence within 60 days of the date of this letter. Please notify this office at least 72 hours prior to the start of field activities. If you have any questions, I can be reached at (510) 567-6762.

wanh

eva chu

Hazardous Materials Specialist

c: Khaled Rahman, Cambria, 1144 65th Street, Suite B, Oakland, CA 94608

shell1.2

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director-



StID 4109

August 27, 1997

Mr. Jeff Granberry Shell Oil P.O. Box 4023 Concord, CA 94524 ENVIRONMENTAL HEALTH SERVICES

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

RE: PSA for Dublin Shell Food Mart at 11989 Dublin Blvd, Dublin, CA

Dear Mr. Granberry:

I have completed review of Cambria's August 1997 Stockpile, Piping, and Dispenser Soil Sampling Report. This report documents soil sampling activities following the removal of four gasoline and two diesel dispensers and their associated piping. Elevated TPHg/TPHd were identified in sample TS-7 and elevated MtBE was identified in samples P1 and D-2.

At this time additional investigations are require to delineate the extent and severity of the fuel release at the site. Such an investigation shall be in the form of a Preliminary Site Assessment, or PSA. The information gathered by the PSA will be used to determine an appropriate course of action to remediate the site, if deemed necessary. The PSA must be conducted in accordance with the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and Article 11 of Title 23, California Code of Regulations. The major elements of such an investigation are summarized in the attached Appendix A.

The PSA proposal is due within 45 days of the date of this letter. If you have any questions, I can be reached at (510) 567-6762.

eva chu

Hazardous Materials Specialist

enclosure

c: William McKammon, Alameda County Fire Ben Maghsoudi, 11989 Dublin Blvd, Dublin, CA 94568

shell1.1

Transfer of Eligible Local Oversight Case

STID 4109 Date transferred 8/27/97 70

Date: 8/27/57 From: Eva Clan
Site Name: prasp Dublin Block Shell Fool Mant
Address: 11989 Dublin Blod City: Dublin Zip: 94568
To be eligible for LOP, case must meet 3 qualifications:
1. Y N Tanks Removed? # of removed? Date removed: 2. Y N Samples received? Contamination level: 12000 ppm TPHD Type of test Contamination should be over 100 ppm TPH to qualify for LOP 3. Y N Petroleum? Circle Type(s): • Avgas •leaded •fuel oil •jet • diesel •waste oil •kerosene •solvents
Procedure to follow should your site meet all the above qualifications:
 a Close the deposit refund case will be done shortly by K. wastreb. b Account for ALL time you have spent on the case. c Turn in account sheet to Leslie. If there are funds still remaining it is still better to transfer the case to LOP as the rate for LOP allows more overhead. DO NOT attempt to continue to oversee the site simply because there are funds remaining! Remaining DepRef \$'s: DepRef Case Closed with Candyce/Leslie? Y N (If no, explain why below.)
2. Submit the completed A and B permit application forms to NORMA.
3. Give the entire case to the proper LOP staff.

Jee

-	UNDERGROUND STORAGE TANK UNAUTHORIZE	ED RELEASE (LEAK) / CONTAMINATIO	ON SITE REPORT
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IMPLEMENTING AGENCIES	Alameda Co, Env. Health	Rob Westomn	(510)567-6781
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INSTRUCTIONS

EMERGENCY

Indicate whether emergency response personnel and equipment were involved at any time. If so, a Hazardous Material Incident Report should be filed with the State Office of Emergency Services (OES) at 2800 Meadowview Road, Sacramento, CA 95832. Copies of the OES report form may be obtained at your local underground storage tank permitting agency. Indicate whether the OES report has been filed as of the date of this report.

LOCAL AGENCY ONLY

To avoid duplicate notification pursuant to Health and Safety code Section 25180.5, a government employee should sign and date the form in this block. A signature here does not mean that the leak has been determined to pose a significant threat to buman health or safety, only that notification procedures have been followed if required.

REPORTED BY

nter your name, telephone number, and address. Indicate which party you epresent and provide company or agency name.

RESPONSIBLE PARTY

Enter name, telephone number, contact person, and address of the party responsible for the leak. The responsible party would normally be the tank owner.

SITE LOCATION

Enter information regarding the tank facility. At a minimum, you must provide the facility name and full address.

IMPLEMENTING AGENCIES

Enter names of the local asency and Regional Water Quality Control Board involved.

SUBSTANCES INVOLVED

Enter the name and quantity lost of the hazardons substance involved. Room is provided for information on two autstances if appropriate. If more than two substances leaked, list the two of most concern for cleanup.

DISCOVERY/ABATEMENT

Provide information regarding the discovery and abatement of the leak.

COHRCE/CAUSE

dicate source(s) of leak. Check box(es) indicating cause of leak.

CASE TYPE

Indicate the case type category for this leak. Check one box only. Case type is based on the most sensitive resource affected. For example, if both soil and ground water have been affected, case type will be "Ground Water". Indicate "Drinking Water" only if one or more manicipal or domestic water wells have actually been affected. A "Ground Waher" designation does not imply that the affected water cannot be, or is not, used for drinking water, but only that water wells have not yet been affected. It is understood that case type may change upon further investigation.

CURRENT STATUS

Indicate the category which best describes the current status of the case. Check one box only. The response should be relative to the case type. For example, if case type is "Ground Water", then "Current Status" should refer to the status of the ground water investigation or cleanup, as opposed to that of soil. Descriptions of options follow:

No Action Taken - No action has been taken by responsible party beyond initial report of leak.

Leak Being Confirmed - Leak suspected at site, but has not been confirmed. Preliminary Site Assessment Workplan Submitted - workplan/proposal. requested of/submitted by responsible party to determine whether ground water has been, or will be, impacted as a result of the release. Preliminary Site Assessment Underway - implementation of workplan. Pollution Characterization - responsible party is in the process of fully defining the extent of contamination in soil and ground water and assessing impacts on surface and/or ground water.

Remediation Plan - remediation plan submitted evaluating long term remediation options. Proposal and implementation schedule for appropriate remediation options also submitted.

Cleanup Underway - implementation of remediation plan.

Post Cleanup Mouitoring in Progress - periodic ground water or other monitoring at site, as necessary, to verify and/or evaluate effectiveness of remedial activities.

Case Closed - regional board and local agency in concurrence that no further work is necessary at the site.

IMPORTANT: THE INFORMATION PROVIDED ON THIS FORM IS INTENDED FOR GENERAL STATISTICAL PURPOSES ONLY AND IS NOT TO BE CONSTRUED AS REPRESENTING THE OFFICIAL POSITION OF ANY GOVERNMENTAL AGENCY

REMEDIAL ACTION

Indicate which action have been used to cleanup or remediate the leak. Descriptions of options follow:

Cap Site - install horizontal impermeable layer to reduce rainfall infiltration.

Containment Barrier - install vertical dike to block horizontal movement of contaminant.

 $\underline{\underline{\mathtt{Excavate}}}$ and $\underline{\mathtt{Dispose}}$ - remove contaminated soil and dispose in approved site.

Excavate and Treat " remove contaminated soil and treat (includes spreading or land farming).

Remove Free Product - remove floating product from water table.

Pump and Treat Groundwater - generally employed to remove dissolved contaminants.

Enhanced Biodegradation - use of any available technology to promote bacterial decomposition of contaminants.

Replace Supply - provide alternative water supply to affected parties.

Treatment at Hookup - install water treatment devices at each dwelling or other place of use.

Vacuum Extract - use pumps or blowers to draw air through soil, Vent Scil - bore holes in soil to allow volatilization of contaminants. No Action Required - incident is minor, requiring no remedial action.

COMMENTS - Use this space to elaborate on any aspects of the incident.

SIGNATURE - Sign the form in the space provided.

DISTRIBUTION

If the form is completed by the tank owner or his agent, retain the last copy and forward the remaining copies intact to your local tank permitting agency for distribution.

1. Original - Local Tank Fermitting Agency

- State Water Resources Control Board, Division of Clean Water Programs, Underground Storage Tank Program, P.O. Box 944212, Sacremento, CA 94244-2120
- 3. Regional Water Quality Control Board
- 4. Local Realth Officer and County Board of Supervisors or their designes to receive Proposition 65 notifications.
- 5. Owner/responsible party.