

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

June 11, 2008

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

Mr. John Ward, Trust Real Estate
Wells Fargo Bank
P.O. Box 693939
San Francisco, CA 94163

Mr. Anye Spivey
AFE Broadway 8LLC
EF Evans
1000 Broadway, Ste. 300
Oakland, CA 94507

Subject: Fuel Leak Case No. RO0000343 and Geotracker Global ID T0600101263, Shell, 461 8th Street, Oakland, CA 94607 – Request for Additional Monitoring during In-situ Chemical Oxidation

Dear Mr. Brown, Mr. Spivey, and Mr. Ward:

The purpose of this correspondence is to request additional monitoring during and following the proposed in-situ chemical oxidation events for the above referenced site. Our previous correspondence of June 10, 2008 indicated that the excavation and in-situ chemical oxidation proposed in the "Agency Response and Work Plan Addendum," dated June 9, 2008 may be implemented as an interim remedial action provided that the technical comments in the June 10, 2008 correspondence were addressed and incorporated during the proposed field activities. Based on further review of site conditions and the proposed chemical oxidation, we now request that you expand the proposed monitoring during and following the chemical oxidation events in order to assure that the chemical reactions do not generate unexpected pressures, temperatures, or off-gassing and that in-situ chemical oxidation is effective in treating the residual contamination. In addition, we request that you consider the phasing or sequencing of injections, particularly during the initial injection event to allow the collection and evaluation of monitoring data prior to injection of the total volume of oxidant.

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

TECHNICAL COMMENTS

1. **Monitoring along Broadway.** Well S-14, which was located along the eastern edge of the excavation, was decommissioned during excavation. As a result, no vapor or groundwater monitoring points are present between the excavation and Broadway. Due to the presence of numerous utilities beneath Broadway, including the BART tube, we request that you install two additional monitoring wells to monitor the effects of the chemical oxidant injections. We request that you install two monitoring wells east of the excavation to monitor temperature, pressure, off-gassing, and water quality. One well should be installed to replace well S-14

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and one well should be installed approximately between former well S-14 and existing well S-9. Please include these plans in the Monitoring Work Plan Addendum requested below.

2. **Monitoring Parameters.** We request that the proposed monitoring be expanded to include measurements of temperature, pressure, volatile organic compounds, and lower explosive limit using the available groundwater monitoring wells and soil vapor probes. These parameters are to be measured continuously or nearly continuously during the initial application of hydrogen peroxide solution and should continue for a minimum of two hours after the last application of the day. Based upon the parameters observed during the initial injection application, the frequency may be decreased during subsequent applications. Please include these plans in the Monitoring Work Plan Addendum requested below.
3. **Increased Groundwater Monitoring.** We request that you sample groundwater monitoring wells at the site prior to the initial injection event and approximately one week after completion of each of the three chemical oxidation events in order to assess whether the oxidant injection has significantly increased dissolved phase concentrations and/or resulted in an expansion of the contaminant plume. In addition to the chemicals of concern, the groundwater samples are to be analyzed for dissolved iron, manganese, chromium, nitrate, and sulfate. Please include these plans in the Monitoring Work Plan Addendum requested below. The groundwater monitoring data are to be reviewed prior to implementing subsequent injection events.
4. **Sequencing of Applications.** Based upon the proposed injection pipe layout diagram, it appears that three injection galleries will be installed in the base of the excavation. Please consider conducting the initial injection applications in the area of the excavation furthest from Broadway to monitor the chemical reactions near the center of the site prior to moving towards the site boundary.
5. **Contingent Measures.** In the Monitoring Work Plan Addendum requested below, please include plans for soil vapor extraction as a contingent measure to control pressure and off-gassing in the event that chemical injections result in unexpected pressures, temperatures, or off-gassing.

TECHNICAL REPORT REQUEST

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

- **June 25, 2008** – Monitoring Work Plan Addendum
- **July 15, 2008** – Work Plan for Vertical Delineation
- **August 20, 2008** – Well Decommissioning and Well Installation Report
- **October 29, 2008** – Interim Remediation Report

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- **45 days following end of each quarter** – Quarterly Groundwater 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.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.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.

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UNDERGROUND STORAGE TANK CLEANUP FUND

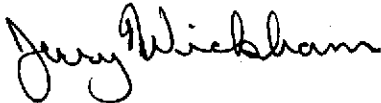
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032

Leah Goldberg, Meyers Nave, 555 12th Street, Suite 1500, Oakland, CA 94607

Jacquelyn England, Conestoga-Rovers & Associates, 19449 Riverside Drive, Suite 230, Sonoma, CA 95476

Ana Friel, Conestoga-Rovers & Associates, 19449 Riverside Drive, Suite 230, Sonoma, CA 95476

Grover Buhr, Treadwell & Rollo, 501 14th Street, 3rd Floor, Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)