



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

June 18, 2013

Pargat Singh & Rawandiep Sran  
19125 Redwood Rd  
Castrol Valley, CA 94546

Mirazim & Afsar Shakoori  
Former Castro Valley Chevron  
4313 Mansfield Drive  
Danville, CA 94506

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

Paul Supple  
Atlantic Richfield Company  
(A BP Affiliated Company)  
P.O. Box 1257  
San Ramon, CA 94583  
(Sent via E-mail to: [paul.supple@bp.com](mailto:paul.supple@bp.com))

Subject: Fuel Leak Case No. RO0000346 and GeoTracker Global ID T0600100920, BP #11105 /  
Shell 17-1445, 3519 Castro Valley Boulevard, Castro Valley, CA 94546

Dear Mr. Singh, Mr. Sran, Mr. and Mrs. Shakoori, Mr. Brown, and Mr. Supple:

Thank you for the recently submitted document entitled *Draft Corrective Action Workplan for Soil Gas Study, Excavation Design and Implementation Activities* (Draft CAP Workplan), dated January 10, 2013, and prepared SOMA Environmental Engineering, Inc. (SOMA) on your behalf for the subject site.

Alameda County Environmental Health (ACEH) conditionally approved the Draft Corrective Action Plan (CAP) for implementation in a letter dated June 14, 2013. Conditional approval is contingent on completion of the public participation notification comment period. Therefore, ACEH requests that you address the following technical comments and send us the reports described below.

### **TECHNICAL COMMENTS**

- 1. Public Participation** – Public participation is a requirement for the Corrective Action Plan process. Therefore, you are required to notify potentially affected stakeholders who live or own property in the surrounding area of the proposed remediation described in the Draft CAP Work Plan through the mailing of a Fact Sheet. ACEH has reviewed the draft Fact Sheet prepared by SOMA for the subject site and has attached a final Fact Sheet for distribution (Attachment A). Please distribute the Fact Sheet to the attached List of Recipients (Attachment B). Following distribution of the Fact Sheet, please provide your personal certification by e-mail or letter, that the Fact Sheet was distributed by U.S. Mail to the attached mailing list no later than July 1, 2013.

Public comments on the proposed remediation will be accepted for a period of thirty days. Following the thirty day public comment period, the comments received, and ACEH's technical comments described in our letter dated June 14, 2013, must be addressed and incorporated into a Final CAP.

- 2. Landowner Notification** - Pursuant to Section 25297.15 (a), ACEH, the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy the above-mentioned requirement, please complete the Attachment B, "List of Landowners Form," and mail it back to ACEH by the date specified below.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Dilan Roe), according to Attachment 1 and the following naming convention and schedule:

- **July 15, 2013** – Certification of Distribution of Fact Sheet  
(File to be named: RO346\_CAP\_PPRP\_CERT\_L\_yyyy-mm-dd)
- **July 15, 2013** – Landowner Notification Form  
(File to be named: RO346\_LNDOWNR\_F\_yyyy-mm-dd)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6767 or send me an electronic mail message at dilan.roe@acgov.org.

Sincerely,

Dilan Roe, P.E.  
Local Oversight Program Manager

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations &  
ACEH Electronic Report Upload (ftp) Instructions

Attachment A – Public Notification Fact Sheet on Corrective Action

Attachment B – List of Recipients

Attachment C – List of Landowners Form

cc: Mansour Sepehr, SOMA Environmental Engineering, Inc., 6620 Owens Drive, Suite A,  
Pleasanton, CA 94588 (Sent via E-mail to: [msepehr@somaenv.com](mailto:msepehr@somaenv.com))

Matthew Herrick, Broadbent & Associates, Inc., 2000 Kirman Avenue, Reno, NV 89502  
(Sent via E-mail to: [mherrick@broadbentinc.com](mailto:mherrick@broadbentinc.com))

Colleen Winey, Zone 7 Water Agency, (Sent via E-mail to: [cwiney@zone7water.com](mailto:cwiney@zone7water.com))

Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

GeoTracker

File

**ATTACHMENT 1**

**Responsible Party(ies) Legal Requirements/Obligations  
& ACEH Electronic Report Upload (ftp) Instructions**

## Attachment 1

### Responsible Party(ies) Legal Requirements/Obligations

#### REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

#### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements. ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/))

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 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, late 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> July 25, 2012
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) require submission of all reports in electronic form to the county's FTP site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

## REQUIREMENTS

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

RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

## Submission Instructions

- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [.loptoxic@acgov.org](mailto:.loptoxic@acgov.org)
  - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses,** and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [.loptoxic@acgov.org](mailto:.loptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload.** (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

**ATTACHMENT A**

**Public Notification Fact Sheet on Corrective Action**



**June 18, 2013**

## **FACT SHEET ON ENVIRONMENTAL ASSESSMENT**

### **BP #11105/Shell 17-1445**

3519 Castro Valley Boulevard, Castro Valley, CA 94546  
Fuel Leak Case No. RO0000346  
GeoTracker Global ID T0600100920

#### Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at the Shell Gas Station located at 3519 Castro Valley Boulevard, Castro Valley, California. Mr. Shakoori, the lead responsible party for the fuel leak case is proposing excavation as the remediation method to clean up the site.

#### Site Background

The site is located at the corner of Redwood Road and Castro Valley Boulevard in Castro Valley. The site has previously been operated as a British Petroleum gasoline station and is now operated as a Shell gasoline station. Petroleum hydrocarbon contamination has been detected in soil and groundwater beneath the site and in groundwater in downgradient areas and is related to a historical unauthorized release from the underground storage tank system at the site.

#### Proposed Remediation Activities: Soil Excavation and Removal

Soil excavation and off-site disposal is proposed to remediate the soil and groundwater beneath the site. Soil excavation is a well-proven and readily implementable technology, and a common method of removing hazardous materials from a site. Contaminated material is removed and transported to permitted off-site treatment and/or disposal facilities. Excavation and off-site disposal is applicable to the complete range of contaminant groups with no particular target group. Groundwater extracted during excavation activities will be treated utilizing granular activated carbon and discharged to the local sewer system under a temporary discharge permit. Clean backfill material will be imported as necessary to restore the site to match existing grade. This method is

effective because it will remove contaminated soil, which will be confirmed by soil and groundwater sampling and analysis.

The remediation proposal includes application of oxygen reducing compounds (ORC) in the excavation pits prior to backfilling to address post-excavation residual hydrocarbon impacts to groundwater beneath the site, if appropriate. Application of ORC enhances biodegradation activities in the subsurface by releasing oxygen to the subsurface environment. If confirmation soil samples in the excavation pits indicate that the concentrations of remaining chemicals in soil are above environmental screening levels, ORC will be applied in the bottom of the pits prior to backfilling with clean soil.

Dissolved fuel contaminants off-site will be remediated by natural processes, including naturally occurring microbes. This process is expected to become more efficient over time because additional contaminants are not expected to migrate off-site because of source removal at the Shell Service Station.

#### Next Step

Mr. Shakoori is working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. Prior to conducting the proposed remedial activities, a soil gas study will be conducted to evaluate the potential for vapor intrusion to indoor air in adjacent commercial facilities. Based on the results of the soil gas investigation, the proposed excavation limits may be modified if appropriate. The proposed alternative is described in the *Draft Corrective Action Workplan for Soil Gas Study, Excavation Design and Implementation Activities*, dated January 10, 2013, prepared by SOMA Environmental Engineering, Inc. on behalf of Mr. Shakoori. The public is invited to review and comment on the cleanup action proposed in this report.



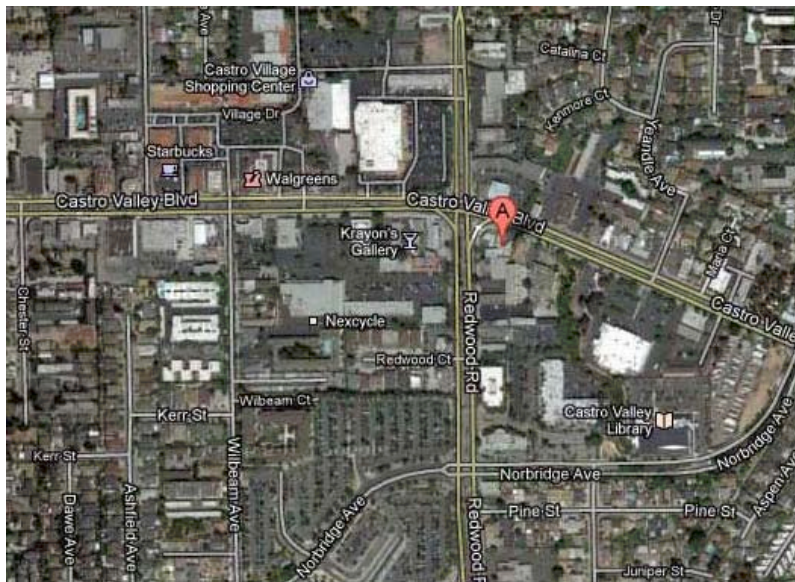
The *Draft Corrective Action Workplan for Soil Gas Study, Excavation Design and Implementation Activities* is available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control board's GeoTracker website (<http://getotracker.waterboards.ca.gov>). The report is also available for review at ACEH, located at 1131 Harbor Bay Parkway in Alameda, California.

Please send a fax to 510-337-9335 to request a date and time to review the case file. Please send written comments regarding the proposed corrective action to Dilan Roe at the address below. All written comments received by **July 31, 2013**, will be forwarded to the Responsible Party, and will be considered and responded to prior to a final determination on the proposed cleanup.

*For additional information, please contact:*

Dilan Roe  
Alameda County Environmental Health  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502  
Phone: 510-567-6767  
E-mail: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)

Mansour Sehyr  
SOMA Environmental Engineering, Inc.  
6620 Owens Drive, Suite A  
Pleasanton, CA 94588  
Phone: 925-734-6400  
E-mail: [msepehr@somaenv.com](mailto:msepehr@somaenv.com)



**Aerial View of Property (Google Earth, 2013)**

**ATTACHMENT B**

**List of Recipients - Fact Sheet Distribution**



LEGEND		
	selected	 Water Body
	Landmark	 Railroad
<b>Landmark Name</b>		 Street Centerline
<b>County Buildings</b>		 Parcel
		 Concrete Channel
		 Closed Conduit
		 Improved Creek
		 Natural Creek
		 Park



Printed: 6/18/2013

Disclaimer: The data, information, and maps provided herein are derived from various sources and are dynamic and in an ongoing state of maintenance, correction and update, and are subject to verification by the user and/or Alameda County. The mapped data depicted herein does not constitute a legal survey. The County of Alameda makes no warranty, representation or guarantee as to the content, accuracy, timeliness or completeness of any of the information implied herein. The County of Alameda explicitly disclaims any representation and warranties, including, without limitation, the implied warranties of merchantability and fitness for a particular purpose.

AHERN MICHAEL & AHERN  
Parcel #: 84C-618-11  
402 SUGAR MAPLE DR  
DANVILLE CA 94506

BECKERLEG ERNEST E &  
Parcel #: 84C-618-3-8  
2477 MIKEMARY CT  
CASTRO VALLEY CA 94546

CHENG JENSEN F & JADE TRS  
Parcel #: 84A-64-8-8  
PO BOX 20188  
CASTRO VALLEY CA 94546

DIEP JENNIE T TR  
Parcel #: 84C-618-3-10  
PO BOX 210738  
SAN FRANCISCO CA 94121

ETS REALTY LLC  
Parcel #: 84A-64-5-4  
2307 PACIFIC AVE  
ALAMEDA CA 94501

FANG FLORENCE P  
Parcel #: 84C-618-10  
980 PARROTT DR  
HILLSBOROUGH CA 94010

GOLDEN WEST SAVINGS &  
Parcel #: 84C-773-5-3  
P.O. BOX 36246  
CHARLOTTE NC 28236

LIN WUNAN & MAGGIE C TRS  
Parcel #: 84C-773-6  
6390 GRASSLAND DR  
CASTRO VALLEY CA 94552

RESIDENT  
Parcel #: 84C-773-5-3  
3538 CASTRO VALLEY BLVD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84C-773-6  
3550 CASTRO VALLEY BLVD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84A-64-5-4  
3495 CASTRO VALLEY BLVD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84A-64-8-8  
20855 REDWOOD RD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84C-618-1-4  
20835 REDWOOD RD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84C-618-3-10  
20860 REDWOOD RD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84C-618-10  
3549 CASTRO VALLEY BLVD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84C-618-3-8  
20880 REDWOOD RD  
CASTRO VALLEY CA 94546

RESIDENT  
Parcel #: 84C-618-11  
3553 CASTRO VALLEY BLVD  
CASTRO VALLEY CA 94546

SINGH PARGAT & SRAN  
Parcel #: 84C-618-1-4  
19125 REDWOOD RD  
CASTRO VALLEY CA 94546

**ATTACHMENT C**

**Landowner Notification Form**

# LIST OF LANDOWNERS FORM

County of Alameda  
Environmental Health Services  
Environmental Protection  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

## CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: BP #11105/Shell 17-1445

Address: 3519 Castro Valley Boulevard

City, State, Zip: Castro Valley, CA 94546

Record ID #: RO0000346

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, \_\_\_\_\_ (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I \_\_\_\_\_, certify that I am the sole landowner for the above site.

Sincerely,

\_\_\_\_\_  
Signature of Primary Responsible Party

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
E-mail Address