AGENCY

DAVID J. KEARS, Agency Director



SCN-22-012

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

May 19, 2006

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

Douglas and Mary Safreno 1627 Vineyard Avenue Pleasanton, CA 94566-6389

Subject: Fuel Leak Case No. RO0000360, Shell#13-5782, 4226 First Street, Pleasanton, CA

Dear Mr. Brown and Mr. and Ms. Safreno:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Revised Work Plan for Soil and Groundwater Assessment," dated May 8, 2006 and prepared on Shell's behalf by Delta Environmental Consultants, Inc. The Revised Work Plan proposes the advancement of three CPT borings and installation of two monitoring wells. The Revised Work Plan adequately addresses the technical comments in our March 9, 2006 correspondence and is approved.

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

TECHNICAL COMMENTS

1. Cross Sections. Please update and expand the two existing cross sections for the site to include the information collected during the proposed investigation. Please incorporate data from the proposed and existing soil borings into hydrogeologic cross sections that depict the lateral and vertical extent of soil layers encountered, where groundwater was first encountered in borings and the static water levels, screen intervals in the monitoring wells, observations of free product, staining, and odor, and analytical results for soil and groundwater samples. Please present the cross sections in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

August 11, 2006 – Quarterly Monitoring Report for the Second Quarter 2006

September 29, 2006 – Site Investigation 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

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.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

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 Wickbam

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: R. Lee Dooley
Delta Environmental Consultants, Inc.
175 Bernal Road, Suite 200
San Jose, CA 95119

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

Danielle Stefani Livermore-Pleasanton Fire Department 3560 Nevada Street Pleasanton, CA 94566

Donna Drogos, ACEH Jerry Wickham, ACEH File

AGENCY



03-10-04

DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

March 9, 2006

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

Douglas and Mary Safreno 1627 Vineyard Avenue Pleasanton, CA 94566-6389

Subject: Fuel Leak Case No. RO0000360, Shell#13-5782, 4226 First Street, Pleasanton, CA

Dear Mr. Brown and Mr. and Ms. Safreno:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the electronic document entitled, "Initial Site Conceptual Model (December 2005), which was received by ACEH on February 27, 2006. The "Initial Site Conceptual Model," includes a work plan, dated January 24, 2006, to advance two CPT borings and collect depth-discrete groundwater samples off-site. The "Initial Site Conceptual Model" and "Work Plan" were prepared on Shell's behalf by Delta Environmental Consultants, Inc. Based on our review of these documents, we request that you submit a revised work plan and proposed boring location map to address the technical comments below on the Work Plan. An update of the site conceptual model is not requested at this time. ACEH has also reviewed the report entitled, "Soil and Water Investigation Report," dated July 11, 2005. The "Soil and Water Investigation Report," presents results from investigation of the waste oil tank backfill behind the service station.

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

TECHNICAL COMMENTS

1. CPT Boring Locations. ACEH concurs with the proposed location of boring CPT-2, which is downgradient of the site and upgradient of a Unocal-branded service station at 4191 First Street. Please note that CPT borings (to depths of approximately 90 feet) have been proposed for the Unocal-branded service station at 4191 First Street. These off-site CPT borings may provide supplemental information to help evaluate the hydrogeology in the downgradient direction. Please review these data from the adjacent site as appropriate in evaluating the site hydrogeology.

We request that CPT-1 be moved from the proposed cross gradient location northwest of the site to an on-site location. We believe that the collection of depth-discrete groundwater

samples on-site is needed to supplement data from the existing long-screen monitoring wells. Please propose a revised location for CPT-1 in the revised Work Plan requested below.

- 2. Former USTs. ACEH requests that a monitoring well be installed on-site in a location northeast of the "Former UST Complex." Soil and groundwater contamination has been detected within and downgradient from the "Former UST Complex," which is located northeast of the station building. The apparent hydraulic gradient at the site is to the northeast as shown on Figure 2 Groundwater Elevation Contour Map (November 22, 2005). Based on the apparent groundwater flow direction to the northeast, existing monitoring wells MW-1 and MW-2 are downgradient of the current UST complex and the dispensers but are not downgradient from the "Former UST Complex." Please present plans to monitor water quality downgradient from the "Former UST Complex," in the revised Work Plan requested below.
- 3. Proposed Deep Monitoring Well. The installation of a deep monitoring well was proposed as a modification to the Work Plan in an electronic mail message from Delta Environmental Consultants, Inc., dated February 21, 2006. ACEH concurs with the installation of a deeper monitoring well on-site to monitor the water-bearing zone beneath the fine-grained layer encountered from 59 to 99 feet below grade in boring SB-7. Please include plans to install a deep monitoring well in the revised Work Plan requested below.
- 4. Cross Sections. Please update and expand the two existing cross sections for the site to include the information collected during the proposed investigation. Please incorporate data from the proposed and existing soil borings into hydrogeologic cross sections that depict the lateral and vertical extent of soil layers encountered, where groundwater was first encountered in borings and the static water levels, screen intervals in the monitoring wells, observations of free product, staining, and odor, and analytical results for soil and groundwater samples. Please present the cross sections in the Soil and Groundwater Investigation Report requested below.
- 5. Waste Oil Tank Backfill. The Soil and Water Investigation Report," dated July 11, 2005, summarizes the background and site history related to discharge of a liquid through a second port into the waste oil tank backfill behind the service station. The report also presents sampling results from one soil boring (WO-1) advanced to a depth of 37 feet below grade immediately adjacent to the waste oil tank backfill. The report indicates that petroleum hydrocarbons probably introduced into the waste oil tank backfill have not migrated into the underlying native soil and recommends no further action. ACEH concurs that no further action related to the waste oil tank backfill is necessary at this time.
- 6. Groundwater Monitoring. Please continue quarterly groundwater monitoring for the site. Based on the age of fuel releases at the site, there is a potential for lead scavengers to be present in soil and groundwater. Please review previous soil and groundwater data for the site to determine whether any analyses have been performed for the lead scavengers, ethylene dibromide (EDB) and 1,2-dichloroethane (EDC). If analyses have been conducted historically, please review the results to assess the need for analyses of lead scavengers. If no analyses have been conducted for lead scavengers, please analyze the groundwater samples collected during the next semi-annual groundwater monitoring event for EDB and EDC. If the lead scavengers are not detected in groundwater samples collected during one

semi-annual groundwater monitoring event, no additional analyses for lead scavengers will be required. Please present results in groundwater monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- May 9, 2006 Revised Work Plan
- May 15, 2006 Quarterly Monitoring Report for the First Quarter 2006
- 120 days following ACEH approval of revised Work Plan Soil and Groundwater Investigation Report
- August 11, 2006 Quarterly Monitoring Report for the Second 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 compilance with this request.

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.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic reporting).

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.

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

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: R. Lee Dooley
Delta Environmental Consultants, Inc.
175 Bernal Road, Suite 200
San Jose, CA 95119

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

Danielle Stefani Livermore-Pleasanton Fire Department 3560 Nevada Street Pleasanton, CA 94566

Donna Drogos, ACEH Jerry Wickham, ACEH File





SUNT -05

DAVID J. KEARS, Agency Director

April 7, 2005

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

Douglas Safreno 1627 Vineyard Avenue Pleasanton, CA 94566

Rick Branchini First Street Shell 4226 First Street Pleasanton, CA 94566 **ENVIRONMENTAL HEALTH SERVICES**

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

Subject:

Fuel Leak Case No. RO0000360, Shell #13-5782, Active Service Station at 4226

First Street, Pleasanton, California - Workplan Approval

Dear Ms. Petryna, Mr. Safreno and Mr. Branchini:

Alameda County Environmental Health (ACEH) has reviewed your March 16, 2005 Work Plan for Waste Oil Tank Investigation prepared by Toxichem Management Systems, Inc., for the above-referenced site. We concur with your workplan provided the following conditions are met:

- The soil sample exhibiting the highest field indication of contamination and the
 groundwater sample from the proposed boring will be analyzed for waste oil minimum
 verification analyses as identified in the RWQCB-CVR April 16, 2004, Appendix A –
 Reports Tri Regional Board Staff Recommendations For Preliminary Investigation And
 Evaluation Of Underground Tank Sites.
- 2. If deemed necessary by your geologist or engineer to fully define the vertical and lateral extent of contamination, additional soil or groundwater samples will be collected as part of the current investigation efforts. ACEH will be informed via telephone or email of any additions to the sampling and analysis plan. Any additional work will follow the workplan-specified procedures. Dynamic investigations are consistent with USEPA protocol for expedited site assessments, which are scientifically valid and offer a cost-effective approach to fully define a plume and to help progress a case toward closure.
- As required by 23 CCR 2729, 2729.1 and 3890 through 3895, all analytical data, monitoring well locations and top-of-casing elevations will be uploaded to the State Geotracker database. Confirmation will be submitted to ACEH in the report requested below.
- 72-hr advance written notification (email preferred) will be provided to ACEH prior to field sampling activities.

Please implement the proposed investigation and submit technical reports following the schedule below.

REPORT REQUEST

Please submit your Soil and Water Investigation Report, which addresses the comments above by **July 8, 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, 6835, 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.

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, P.G.

Roberth Scho

Hazardous Materials Specialist

cc: Ross Tinline, Toxichem Management Systems, Inc., 11 Kenton Ave., San Carlos, CA 94070

Paul Smith, Livermore-Pleasanton Fire Dept., 3560 Nevada St., Pleasanton, CA 94566

Matt Katen, Zone 7 Water District, QIC 80201

Donna Drogos, ACEH

File

AGENCY



10-23-02

DAVID J. KEARS, Agency Director

October 22, 2002

RO 360

Ms. Karen Petryna Shell Oil Products US P.O. Box 7869 Burbank, CA 91510-7869 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Shell Station, 4226 First Street, Pleasanton - Request for Total Fuel Oxygenate Analyses

Dear Ms. Petryna:

The case file for the referenced site was recently reviewed, up to and including the October 2002 Cambria Environmental Technology third quarter 2002 monitoring report. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the various wells within the network. Our review revealed that a number of potential fuel oxygenates may not have been sought historically from samples collected from these wells.

Please direct your consultant to analyze all samples collected during the next scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) and lead scavengers (EDB and 1,2-DCA / EDC) using EPA Method 8260. Such expanded analyses may be required to continue depending upon what is found.

In addition, you are reminded that all reports for this case, as well as all other Shell Oil Products US cases, are to be submitted under Shell Oil Products US cover that is signed, under penalty of perjury, by the official Shell Oil Products US project representative.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM

Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Danielle Stefani, Livermore-Pleasanton Fire Department

Jacquelyn Jones, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608

SONT 7-18-2000

ALAMEDA COUNTY HEALTH CARE SERVICES





DAVID J. KEARS, Agency Director

120360

July 17, 2000

STID 1646

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

Ms. Karen Petryna Equiva Services LLC Science & Engineering, West Coast P.O. Box 7869 Burbank, CA 91510-7869

RE: SHELL SERVICE STATION, 4226 FIRST STREET, PLEASANTON

Dear Ms. Petryna:

I have completed review of the June 23, 2000 Cambria Environmental Technology, Inc. (Cambria) subsurface investigation report documenting the recent installation, sampling, and monitoring of two (2) additional monitoring wells at the subject site.

At this time, please adhere to a quarterly schedule of well sampling, monitoring and reporting. Reports are due for submittal to this agency within 60 days of the completion of field activities for each quarterly event. This case will be tracked over a period of time, and the direction or scope of the project revised based on the nature of the data submitted.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM

Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Danielle Stefani, Livermore-Pleasanton Fire Department

Mat Katen, Zone 7 Water Agency, 5997 Parkside Dr., Pleasanton, CA 94588-5127

Barbara Jakub, Cambria Environmental Technology, Inc.

1144-65th Street, Ste. B, Oakland, CA 94608

AGENCY

DAVID J. KEARS, Agency Director



Sent 12/29/99 Including ccs

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577

(510) 567-6700 (510) 337-9432 20366

December 28, 1999

STID 2400

•

Mr. David De Witt Tosco Marketing Company 2000 Crow Canyon Place, Ste. 400 San Ramon, CA 94583

RE: UNOCAL SERVICE STATION #3292, 15008 EAST 14TH STREET, SAN LEANDRO

Dear Mr. De Witt:

Thank you for our recent receipt of the November 24, 1999 Gettler-Ryan Inc. (GRI) report documenting the May 1998 Geoprobe® investigation of the subject site and surrounding area. This work appears to have substantially adhered to the scope of work outlined in the Kaprealian Engineering, Inc. (KEI) work plan dated November 5, 1996.

The data presented in the cited GRI report augment the compilation of similar data acquired through many years of sampling from the 13-well network completed in locations both on- and off-site. These data assist in the evaluation of dissolved-phase plume geometry, well network adequacy, and interpretation of potential human health risks to nearby receptor populations. The sampling data appear, in general, to demonstrate a stable or diminishing trend in overall concentrations for the dissolved-phase hydrocarbon plume. Plume geometry also appears adequately defined.

The exceptions to this overall trend are the methyl tert-butyl ether (MtBE) "spikes" identified in groundwater samples collected from well MW-1 beginning in November 1998 (8,650 - 21,000 ug/l [EPA 8260]). Well MW-1 is located directly adjacent to the fuel underground storage tank (UST) cluster. It is unclear what may have caused these MtBE spikes as, on December 30, 1998, after completion of UST upgrade work, the tank systems were certified "compliant" with the 1998 UST standards. New operating permits were also issued on that date. Progression of the MtBE plume will be closely monitored by this office in both the source and downgradient wells, as will any indication of subsequent MtBE releases.

Environmental sampling data generated during and since the 1991 UST replacements have been reviewed in context with the E 1739-95 American Society for Testing and Materials (ASTM) Standard Guide for Risk-Based Corrective Action (RBCA) Applied at Petroleum Release Sites in contemplation of potential health risks to nearby receptor populations.

Maximum target compound concentrations in both soil and groundwater samples were considered, and plausible exposure scenarios determined.

Mr. DeWitt

RE: 15008 E.14th Street, San Leandro

December 28, 1999

Page 2 of 3

Benzene was determined to be the primary and risk-driving chemical of concern (CoC) in this case. Potential complete exposure pathways appear limited to the intrusion of vapors into buildings and volatilization to outdoor air from both soil and groundwater under a commercial/industrial receptor scenario.

Assumptions used to derive a California-modified ASTM Tier 1 Risk-Based Screening Level (RBSL) Look-up table were reviewed and appear valid for initial use in this case to make conservative risk comparisons. Review of the RBSLs for both exposure pathways indicates the vapor intrusion to buildings pathway to be the most restrictive and, hence, was used to complete this initial evaluation. A comparison of Tier 1 RBSLs with <u>maximum</u> historic benzene concentrations reveals an exceedence of the Tier 1 soil RBSLs at the 10⁻⁴ excess cancer risk level for the soil vapor intrusion to buildings exposure pathway.

It appears appropriate at this time to complete a Tier 2 evaluation to better define potential exposure risks based on more site-specific parameters, while still achieving similar levels of protection (e.g., 10⁻⁴ to 10⁻⁶ risk levels). In order to facilitate this task, I request that a meeting be scheduled in January 2000 so that we may determine an appropriate set of input parameters to go into your Tier 2 evaluation.

In addition, I have considered your request for reduction of sampling frequencies for this project. After review of this case and project objectives, the following sampling schedule modifications appear warranted and may be instituted beginning the first quarter of 2000:

WELL	FREQUENCY	SCHEDULE
MW-1	Quarterly	
MW-2	a	
MW-3	Discontinue	
MW-4	cc.	
MW-5	Semi-annual	May and November
MW-6	Discontinue	,
MW-7	Semi-annual	May and November
MW-8	и	at .
MW-9	Quarterly	
MW-10	u	
MW-11	u	
MW-2(sp)	Semi-annual	May and November
MW-3(sp)		

Mr. DeWitt

RE: 15008 E.14th Street, San Leandro

December 28, 1999

Page 3 of 3

Please call me at (510) 567-6783 to set up the RBCA Tier 2 scoping meeting or should you have any questions.

Sincerely,

-Scott Ø./Seery, CHMM

Hazardous Materials Specialist

cc: Ariu Levi, Chief, Environmental Protection

Chuck Headlee, RWQCB

Doug Lee, Gettler-Ryan Inc., 6747 Sierra Ct., Ste. J, Dublin, CA 94568





Sent 12/1/49 Including ccs

R0360

DAVID J. KEARS, Agency Director

December 1, 1999

STID 1646

Ms. Karen Petryna Equiva Services LLC Science & Engineering, West Coast P.O. Box 6249 Carson, CA 90749-6249 ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700 (510) 337-9432

RE: SHELL SERVICE STATION, 4226 FIRST STREET, PLEASANTON

Dear Ms. Petryna:

I have completed review of the November 15, 1999 Cambria Environmental Technology, Inc. (Cambria) soil and water investigation (SWI) workplan, submitted in response to a September 14, 1999 request from this office that a SWI be performed and a workplan presented. The Cambria work plan calls for the installation of two additional monitoring wells at the site, and the collection of both soil and groundwater samples from each.

The cited Cambria workplan is accepted as submitted with the following clarifications:

- 1. Sampling of groundwater from completed wells shall not occur any sooner than 24, and preferably 72, hours after well development.
- Proposed well MW-2, to be completed near the current tank complex, shall be <u>continuously cored</u> to aid in the interpretation of underlying geology.
- 3. Of those soil samples collected during boring advancement for eventual laboratory analysis, one such sample from each borehole shall be from the apparent capillary zone.

This workplan is to be implemented within 60 days of the date of this letter.

Please call me at (519) 567-6783 to advise when field work has been scheduled.

Sincerely,

Scott O. Seery, CHMM

Hazardous/Materials Specialist

cc: Chuck Headlee, RWQCB

Danielle Stefani, Livermore-Pleasanton Fire Department

Mat Katen, Zone 7 Water Agency, 5997 Parkside Dr., Pleasanton, CA 94588-5127

Barbara Jakub, Cambria Environmental Technology, Inc.

1144-65th Street, Ste. B. Oakland, CA 94608

DAVID J. KEARS, Agency Director

RO360

September 14, 1999

STID 1646

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

Ms. Karen Petryna Equiva Services LLC Science & Engineering, West Coast P.O. Box 6249 Carson, CA 90749-6249

RE: SHELL SERVICE STATION, 4226 FIRST STREET, PLEASANTON

Dear Ms. Petryna:

I have completed review of the August 12, 1999 Cambria Environmental Technology, Inc. (Cambria) report documenting the limited subsurface investigation conducted at this site during April 1999. Borings SB-6 and -7 were advanced adjacent to the driveway leading onto the site from Vineyard Avenue. Monitoring well MW-1 was constructed within boring SB-6.

Up to 10,000 ug/l total petroleum hydrocarbons as gasoline (TPH-G) and 4500 ug/l benzene were identified in grab water samples collected from boring SB-6. Target compound concentrations were reduced by a factor of 10⁻² in grab samples collected from SB-7. Methyl tert-butyl ether (MtBE) was reportedly not detected in grab samples collected from either boring above a laboratory limit of 250 and 2.5 ug/l, respectively. These data appear to indicate an historic (pre-1992) release at this site based on the preliminary MtBE results.

Logs from borings SB-6 and -7 illustrate the complex nature of the interbedded sedimentary geology underlying this site, particularly at depths below 15' below grade (BG). Although these two borings are but 25' apart, and in the same general direction from the former underground storage tank complex, their logs differ markedly below this depth. This recent work augments previous investigations that also identified laterally-discontinuous sedimentary layers across the site. Such heterogeneity impedes a straightforward interpretation of contaminant distribution away from the source area. Consequently, further investigation and well installations are necessary.

In order to better understand groundwater flow and contaminant distribution, a soil and water investigation (SWI) work plan for the installation of additional monitoring wells is requested. The SWI work plan shall propose a minimum of 2, and preferably 3, additional wells. This number of wells is necessary to calculate groundwater flow direction and gradient. The SWI work plan must be endorsed by a California-registered geologist or civil engineer. The request for a SWI is pursuant to provisions of Article 11, Title 23, California Code of Regulations.

The SWI work plan is due within 60 days of the date of this letter.

Karen Petryna RE: 4226 First Street, Pleasanton September 14, 1999 Page 2 of 2

In the meanwhile, monitoring well MW-1 shall be monitored and sampled following a quarterly schedule. This work shall commence beginning the 4th quarter of 1999, and continue until notified otherwise. Groundwater samples shall be analyzed for the standard target compounds: TPH-G, MtBE, and BTEX.

Reports are also due on a quarterly basis, and must be submitted within 60 days of completion of field activities for each quarterly event. Each report shall include, among other elements, depth-to-water measurements with conversions to elevations above mean sea level (MSL), and groundwater gradient and chemical isoconcentration maps. Sampling data shall also be tabulated for ease of review.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,

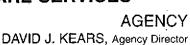
Seott Ø. Seery, CHMM

Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Danielle Stefani, Livermore-Pleasanton Fire Department Mat Katen, Zone 7 Water Agency, 5997 Parkside Dr., Pleasanton, CA 94588-5127

Barbara Jakub, Cambria Environmental Technology, Inc. 1144-65th Street, Ste. B, Oakland, CA 94608





RO362,363 194, 1151,439

July 22, 1999

ENVIRONMENTAL HEALTH SERVICE

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

Ms. Danielle Stefani Livermore-Pleasanton Fire Department 4550 East Avenue Livermore, CA 94550

RE:

MtBE-impacted sites in Pleasanton

Dear Ms. Stefani:

This letter is sent in response to your recent request for an update on sites located in Pleasanton that are impacted by the gasoline additive methyl-tert butyl ether, or MtBE.

Following is a brief summary for each of the active fuel tank cases currently overseen by this agency. Please note that not all retail service station or other underground storage tank (UST) sites in Pleasanton are listed. Data for closed or otherwise inactive cases are not presented in this summary, nor are data for cases not yet managed by this office. Both the highest historic MtBE concentrations (and date) as well as the highest concentrations in the last 12 months are given where these data are available.

Unocal Station, 4191 First Street

This site was historically used for warehousing, but was developed into a retail fueling station in ~1976. Several gasoline releases were documented in the 1980's. Several phases of investigation have been completed, beginning in the late 1980's and continuing up to the present. More work is currently pending. An 8 well network is established both on- and off-site, with more wells planned.

Highest MtBE:

6200 micrograms per liter, or ug/l (6/98)

12 month high:

4800 ug/l

Shell Station, 4226 1st Street (RO# 360)

Although a preliminary assessment of the original UST complex was completed in 1985 prior to tank replacement, the results were somewhat inconclusive due to limited project scope. Two additional phases of work occurred in 1990, the results of which, again, were somewhat inconclusive. MtBE was not sought during these prior investigations. A recent phase of assessment was performed in April 1999, and included the installation of a permanent monitoring well. The final report of this recent work is pending; however, preliminary data indicate that, although underlying groundwater has been impacted, MtBE was not identified.

Highest MtBE:

<250 ug/l (4/99)

12 month high:

as above

Ms. Danielle Stefani RE: MtBE report for Pleasanton sites July 22, 1999 Page 2 of 4

Henry Moller & Sons Meat Packing Plant, 5710 Foothill Road

A small gasoline UST was removed in 1990. Six monitoring wells were eventually installed and monitored over several years due to a release from this tank. Although underlying groundwater was impacted to some extent by gasoline compounds, MtBE was not detected (ND) above laboratory reporting limits. Potential impact to Gold Creek was also evaluated and dismissed. The site is currently under review for case closure.

Highest MtBE:

ND

12 month high:

65

Steve's Exxon, 2991 Hopyard Road

This site, located on the corner of Hopyard Road and Valley Avenue, appears to be the most critical release site in Pleasanton due to its close proximity to both the City's and Zone 7's well fields. There is a current network of 11 wells located both on- and off-site, including two wells (MW-5D, MW-8) which monitor deeper water bearing zones of the underlying aquifer. The data appear to demonstrate that impacts are substantially constrained to the site. Exxon operated a soil-vapor extraction (SVE) system at the site up to the early 1990s, and reinstated its use in early 1998 but with limited success so far due to water infiltration into the vapor extraction wells. A request for an additional well and modification to the SVE system has been made.

Highest MtBE:

4950 ug/l (3/99)

12 month high:

same

Shell Station, 3790 Hopyard Road

An apparent release was discovered during routine monitoring of the USTs in 1987. These tanks were removed in 1988 and new tanks installed elsewhere on the site. Several phases of investigation followed with the eventual construction of 10 shallow monitoring wells, located both on- and off-site, and 3 recovery wells, installed at a time when active remediation was being considered. Nine of the monitoring wells are now sampled and monitored yearly.

Highest MtBE:

6900 ug/l (6/97)

12 month high:

1780 ug/l

Shell Station, 5251 Hopyard Road

A release was first discovered at this site in 1987 during installation of one shallow groundwater and 3 vadose zone wells intended to provide indirect monitoring of the UST system. Four additional shallow on-site wells were installed in 1989, followed by 3 more in 1990 installed in off-site locations. The fuel release appears to be substantially constrained to the site. All wells are currently monitored on a yearly schedule.

Ms. Danielle Stefani

RE: MtBE report for Pleasanton sites

July 22, 1999 Page 3 of 4

Highest MtBE:

3200 ug/l (5/97)

12 month high:

374 ug/l

Chevron Station, 5280 Hopyard Road

It has been reported that the original USTs were replaced in 1981. A gasoline release was identified during routine tank monitoring in 1989 and lead to the eventual installation of 3 shallow monitoring wells. In ~1991 the station was reconfigured and new tanks were installed in another location at the site. The three original wells were destroyed in the process and replaced. Three additional off-site wells were installed in 1997 for a total of 6 active wells.

Highest MtBE:

680 ug/l (6/96)

12 month high:

290 ug/l

(Former) Exxon Station, 349 Main Street

A release was discovered during the 1989 replacement of the original USTs at this former service station site. These replacement tanks were subsequently removed in 1993, and the site and later redeveloped. Several phases of environmental investigation followed the 1989 tank replacement, resulting in the eventual installation of 8 monitoring wells, on both on- and off-site locations, and 3 SVE wells. No active remediation occurred. Only two wells survive to this day. The site is currently being considered for closure.

Highest MtBE:

11 ug/l (6/96)

12 month high:

ND

(Former) Mobil Station, 1024 Main Street

A release from the USTs was discovered during 1989 tank removals. Since that time several phases of investigation have been performed, with the eventual installation of 12 monitoring wells located both on- and off-site, and 3 groundwater and 4 SVE wells. SVE and groundwater treatment systems have operated nearly continuously at the site since 1995, with the cumulative removal of over 4000 gallons of product from the unsaturated soils and 3.9 million gallons of groundwater treatment system throughput. Although MtBE was "tentatively" identified (EPA Method 8020) in samples collected in the past from wells at the site, its presence was either not confirmed using more definitive laboratory methodologies (EPA Method 8260), or the actual concentrations were insignificant.

Highest MtBE:

1000 ug/l (Method 8020); ND (Method 8260) (8/97)

12 month high:

25 ug/l (Method 8260)

Ms. Danielle Stefani

RE: MtBE report for Pleasanton sites

July 22, 1999 Page 4 of 4

Can-Am Plumbing, 151 Wyoming Street

Although not yet a "case" overseen by this office, preliminary data collected during the June 1999 tank removals indicate up to 100,000 ug/l MtBE in shallow water within the tank pit. It is unknown if the sampled water represents true groundwater or an isolated "perched" zone. Awaiting final report and a determination of next appropriate steps in confirmation of this apparent release.

Highest MtBE:

100,000 ug/l (6/99)

12 month high:

as above

I trust this report provides the information you were seeking. Please contact me at (510) 567-6783 should you need further assistance.

Sincerely,

∽Sqott O. \$eery, CHMM

Hazardous Materials Specialist

CC:

Thomas Peacock, ACDEH LOP

Chuck Headlee, RWQCB Craig Mayfield, Zone 7

Steve Cusenza, City of Pleasanton, P.O. Box 520, Pleasanton, CA 94566-0802

AGENCY



DAVID J. KEARS, Agency Director

ROZLO

May 5, 1999

STID 1646

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

Ms. Karen Petryna Equiva Services LLC Science & Engineering, West Coast P.O. Box 6249 Carson, CA 90749-6249

RE: Shell Service Station, 4226 1st Street, Pleasanton

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Ms. Petryna:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 4226 1st Street, Pleasanton

May 5, 1999 Page 2 of 2

In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,

Scott O. Seery, CHMM

Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

Danielle Stefani, Livermore-Pleasanton Fire Department

AGENCY

DAVID J. KEARS, Agency Director



Ro# 360

February 18, 1999

STID 1646

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

ENVIRONMENTAL HEALTH SERVICES

Ms. Karen Petryna Equiva Services LLC Science & Engineering, West Coast P.O. Box 6249 Carson, CA 90749-6249

RE: SHELL SERVICE STATION, 4226 FIRST STREET, PLEASANTON

Dear Ms. Petryna:

In correspondence dated February 20, 1997, a Cambria Environmental Technology, Inc. site assessment work plan dated January 2, 1997, as revised February 19, 1997, was accepted by this office. Attached is a copy of the referenced letter from this office. Please note that acceptance of the cited work plan was conditional upon a modified approach.

I understand that this work has not yet been performed. At this time you are directed to implement the scope of work outlined in the modified work plan within 45 days of the date of this letter.

I request that you contact me at (510) 567-6783 when fieldwork is scheduled to begin.

Sincerely,

Scott O/ Seery, CHMM

Hazardous Materials Specialist

Enclosure

cc: Chuck Headlee, RWQCB

Danielle Stefani, Livermore-Pleasanton Fire Department

ALAMEDA COUNTY

HEALTH CARE SERVICES





DAVID J. KEARS, Agency Director

RO#360

February 20, 1997

STID 1646

Mr. Jeff Granberry Shell Oil Products Company P.O. Box 4023 Concord, CA 94524

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

SHELL SERVICE STATION, 4226 FIRST STREET, PLEASANTON RE:

Dear Mr. Granberry:

I am in receipt of the January 2, 1997 Cambria Environmental Technology, Inc. ("Cambria") work plan for the limited assessment of the subject Pleasanton site. After conversations with Mr. Paul Waite, Cambria's Project Engineer, regarding boring locations and project scope, a work plan revision dated February 19, 1997 was transmitted via facsimile on that same date.

The cited work plan, as revised, has been accepted for this phase of work at the site with the following change:

Soil samples are to be collected beginning at the 15' depth (instead of beginning at 40' as proposed) in each boring following the protocol outlined in the revised work plan. samples which show evidence of hydrocarbon impact (i.e., odors, vapor analyzer deflection, etc.) are to be submitted for chemical analysis.

Please contact me at (510) 567-6783 when field work is scheduled to begin.

Sincerely,

βееу∕у, СНММ

Senior Hazardous Materials Specialist

Mee Ling Tung, Agency Director

Kevin Graves, RWQCB

Bill Halvorsen, Pleasanton Fire Department

Paul Waite, Cambria Environmental Technology, Inc. 1144-65th St., Ste. B, Oakland, CA 94608

AGENCY DAVID J. KEARS, Agency Director



RO# 360

February 20, 1997

STID 1646

Mr. Jeff Granberry Shell Oil Products Company P.O. Box 4023 Concord, CA 94524

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

RE: SHELL SERVICE STATION, 4226 FIRST STREET, PLEASANTON

Dear Mr. Granberry:

I am in receipt of the January 2, 1997 Cambria Environmental Technology, Inc. ("Cambria") work plan for the limited assessment of the subject Pleasanton site. After conversations with Mr. Paul Waite, Cambria's Project Engineer, regarding boring locations and project scope, a work plan revision dated February 19, 1997 was transmitted via facsimile on that same date.

The cited work plan, as revised, has been accepted for this phase of work at the site with the following change:

Soil samples are to be collected beginning at the 15' depth (instead of beginning at 40' as proposed) in each boring following the protocol outlined in the revised work plan. samples which show evidence of hydrocarbon impact (i.e., odors, vapor analyzer deflection, etc.) are to be submitted for chemical analysis.

Please contact me at (510) 567-6783 when field work is scheduled to begin.

Sincerely,

Scott Ø. Seery, CHMM Senior Hazardous Materials Specialist

cc: Mee Ling Tung, Agency Director

Kevin Graves, RWQCB

Bill Halvorsen, Pleasanton Fire Department

Paul Waite, Cambria Environmental Technology, Inc.

1144-65th St., Ste. B, Oakland, CA 94608

AGENCY



20360

DAVID J. KEARS, Agency Director

July 31, 1996

STID 1646

Alameda County CC4580 Environmental Protection Division 1131 Harbor Bay Parkway, Room 250 Alameda CA 94502-6577

Mr. Jeff Granberry Shell Oil Products Company P.O. Box 4023 Concord, CA 94524

RE: SHELL SERVICE STATION, 4226 FIRST STREET, PLEASANTON

Dear Mr. Granberry:

This letter is in follow-up to our meetings July 26 and February 22, 1996. You may recall that we discussed the statutory requirement to perform an investigation at the referenced Pleasanton site to determine whether ground water has been affected by apparent releases from the former underground storage tank (UST) complex.

The county is receptive to a limited project scope in the form of soil borings and "grab" water samples or, similarly, the use of so-called "push tool" technology (e.g., GeoProbe, etc.) to accomplish project goals. However, the county, will allow Shell to determine whether permanent well installations would better meet Shell's long-term objectives for the site.

Please submit a soil and water investigation (SWI) work plan presenting the proposed scope of work for this phase of the investigation at the subject site <u>before the end of 1996</u>.

You may reach me at 510/567-6783 should you have any questions.

Sincerely,

Scot/t o. See/ry, CHMM

Senior Hazardous Materials Specialist

cc: Mee Ling Tung, Agency Director

Gil Jensen, Alameda County District Attorney's Office

Kevin Graves, RWQCB

William Halvorsen, Pleasanton Fire Department

AGENCY

DAVID J. KEARS, Agency Director



ROBGO RAFAT A. SHAHID, DIRECTOR

November 14, 1995

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway

Alameda, CA 94502-6577 (510) 567-6777

STID 1646

Mr. Jeff Byram Shell Oil Products Company P.O. Box 4023 Concord, CA 94524

RE: SHELL SERVICE, 4226 FIRST STREET, PLEASANTON, CALIFORNIA

Dear Mr. Byram:

The Alameda County Department of Environmental Health (ACDEH), Environmental Protection Division, recently contracted with the City of Pleasanton ("City") for oversight of environmental investigations associated with leaking underground storage tank (UST) sites in the City. This agency has become aware that releases from the UST system have occurred at the referenced Shell site, the earliest of which was documented during 1985. We are also aware that some investigative work has been completed since that time.

As ACDEH will be the lead agency for this case until "case closure" is granted, it is important that all technical documents published to date be forwarded to this office. Therefore, please provide all such documents within 45 days of the date of this letter.

Should you have any questions, please contact me at 510/567-6783.

Sincerely,

Scott O. Seeny, CHMM

Senior Hazardous Materials Specialist

Jun Makishima, Acting Director, Environmental Health

Gil Jensen, Alameda County District Attorney's Office William Halvorsen, Pleasanton Fire Department Kevin Graves, RWQCB

Thomas Fojut, Weiss Associates