

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 9, 2008

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 and Geotracker Global ID T0600101259, Shell#13-5782, 4226 First Street, Pleasanton, CA 94566

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 including the reports entitled, "*Dual-Phase Extraction Feasibility Study and Batch Extraction Workplan, Shell-branded Service Station, 4226 First Street, Pleasanton, California,*" dated March 12, 2008 (Work Plan) and "*Second Quarter 2008 Groundwater Monitoring Report, Shell-branded Service Station, 4226 First Street, Pleasanton, California,*" dated August 13, 2008. Both reports were prepared on Shell's behalf by Delta Environmental Consultants, Inc. Work Plan proposes a 5-day dual-phase extraction (DPE) pilot test and batch groundwater extraction.

The proposal to conduct a DPE pilot test is acceptable; however, we have several technical comments and additions to the proposed methods for the DPE event. The DPE pilot test may be implemented provided that the technical comments below are addressed and incorporated during the proposed activities. Submittal of a revised Work Plan or Work Plan Addendum is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Water Supply Wells.** The "*Second Quarter 2008 Groundwater Monitoring Report, Shell-branded Service Station, 4226 First Street, Pleasanton, California,*" dated August 13, 2008 states that, "No municipal water supply wells were identified within a 1-mile radius of the site. However, a review of the Well Location Map in the, "Initial Site conceptual Model (September 2005) dated February 6, 2006 indicates that a municipal water supply well is located approximately 1,200 feet northwest of the site. A well of unknown use appears to be located approximately 1,000 feet northwest of the site. Please review the sensitive receptor survey

for the site and correct future reports as necessary. In addition, all water supply wells rather than just municipal supply wells should be considered sensitive receptors.

2. **Site Location on Figure 1.** The location of the site on Figure 1 in both reports is incorrect. Please correct the location in future reports.
3. **Extraction Wells.** Well MW-4 is the only well proposed for testing during the DPE pilot test. The concentrations of fuel hydrocarbons and oxygenates are highest in groundwater from well MW-4. Therefore, we have no objection to the DPE event being conducted primarily within well MW-4. However, we request that you also conduct DPE testing for up to 8 hours within wells MW-1 and MW-2.
4. **Vapor Extraction Rate.** The applied vacuum should be incremental increased to determine the optimal extraction rate for maximum air flow. Once determined, the optimal extraction rate should be used to determine induced vacuum and sustained rates of contaminant extraction.
5. **Monitoring Parameters.** Please include measurements of water level drawdown in proximal wells during the DPE testing. In additional, the volume of groundwater extracted should be measured continuously using a totalizing meter.
6. **Analytical Methods.** The proposed analytical methods for soil and groundwater samples are acceptable. The Work Plan proposes analysis of soil vapor samples using method TO-14. We request that you use EPA Method 8260B for analysis of soil vapor samples rather than TO-14. The more current TO-14A or TO-15 analytical methods are also acceptable for analysis of the soil vapor samples.
7. **Proposed Batch Extraction.** Extraction of 20,000-gallons of water is proposed from well MW-1 to reduce off-site migration. We do not believe that batch extraction has very limited effectiveness for this site and is not cost effective. Therefore, unless you provide further technical justification to demonstrate that pumping 20,000 gallons of water from well MW-1 is effective in preventing off-site migration, we do not concur with implementation of batch extraction and recommend that the UST Cleanup Fund not reimburse any future costs for batch extraction.
8. **Groundwater Monitoring.** Please continue quarterly groundwater sampling and present the results in the quarterly monitoring reports requested below.
9. **Report Submittals.** We received hard copies of the "Draft Corrective Action Report," dated November 2, 2007 and "Third Quarter 2007 Groundwater Monitoring Report," dated November 10, 2007. Electronic versions of these reports were uploaded to Geotracker but not uploaded to the ACEH ftp site. Please submit these two reports in electronic form in order to complete the ACEH agency files for this case. The report entitled, "*Site Investigation and Interim Remedial Action Report*," dated June 25, 2007 is missing attachments D, E, F, and G, which includes Pumping Test Data. Please resubmit "*Site Investigation and Interim Remedial Action Report*," dated June 25, 2007 to the ACEH website and Geotracker with all attachments.

TECHNICAL REPORT REQUEST

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

- **January 14, 2009** – DPE Pilot Test Report
- **45 days following the end of each quarter** – Quarterly Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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](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

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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

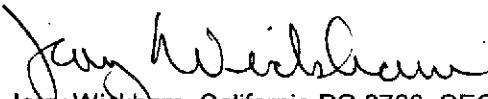
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 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: Cheryl Dizon, 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

Rich Garlow, Delta Environmental Consultants, Inc., 312 Piercy Road, San Jose, CA 95138

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)