

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



F

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

October 25, 2007

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

Subject: Fuel Leak Case No. RO0000363 and Geotracker Global ID T0600101257, Shell#13-5784, 3790 Hopyard Road, Pleasanton, CA 94566

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the quarterly groundwater monitoring reports submitted in 2006 and 2007. Quarterly monitoring reports submitted in 2006 and 2007 are dated January 26, 2006, May 15, 2006, July 15, 2006, October 15, 2006, January 15, 2007, April 15, 2007, July 15, 2007, and October 10, 2007. All reports were prepared on Shell's behalf by Delta Environmental Consultants, Inc. (Delta).

A plume of MTBE and TBA extends more than 170 feet south from the site. MTBE and TBA have been detected in groundwater on-site at concentrations up to 18,000 micrograms per liter ( $\mu\text{g/L}$ ) and 17,000 micrograms per liter  $\mu\text{g/L}$ , respectively. MTBE and TBA have been detected in well S-9, which is the furthest downgradient well in the quarterly monitoring program, at concentrations up to 340 micrograms per liter ( $\mu\text{g/L}$ ) and 25  $\mu\text{g/L}$ , respectively. A groundwater extraction system operated on site from July 2003 to May 2006 to limit plume migration and provide some groundwater cleanup.

Based on groundwater concentrations over time, Delta Environmental concluded that hydraulic control of MTBE migration was no longer needed and requested a trial shutdown of the groundwater extraction system in a document entitled, "Remediation System Shutdown Request," dated April 3, 2006. In correspondence dated April 26, 2006, ACEH concurred with trial shutdown of the groundwater extraction system and requested that an evaluation of plume migration and the need to re-start the groundwater extraction system be included in quarterly monitoring reports. As discussed in the technical comments below, the evaluations of plume stability have been abbreviated since the trial shutdown of the groundwater extraction system.

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

**TECHNICAL COMMENTS**

1. **Missing Figures.** The electronic version of the July 15, 2007 and October 10, 2007 Quarterly Monitoring and Remediation Status Reports did not include Figures 2 through 7. Figures 2 through 7 were included in the April 15, 2007 Quarterly Monitoring and

Remediation Status Report but were not legible. Please submit revised electronic versions of these three quarterly monitoring reports that include Figures 2 through 7.

2. **Time Concentration Graphs.** Time concentration graphs for wells S-4, SR-2, S-6, and S-7 were included in the "Remediation System Shutdown Request," dated April 3, 2006. We request that you update these time concentrations graphs in the future and present them in quarterly monitoring reports on a semi-annual basis. We also request that you prepare a time concentration graph for well S-9 and present the graph in future quarterly monitoring reports on a semi-annual basis.
3. **Evaluations of Plume Stability.** Comments in the quarterly monitoring reports currently consist of one to two sentences regarding increases or decreases in concentration and plume stability. We request that you include a more comprehensive evaluation of plume stability and monitored natural attenuation in the quarterly monitoring reports on a semi-annual basis.

#### **TECHNICAL REPORT REQUEST**

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

- 30 days following 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**

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](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**

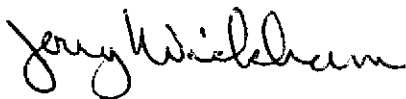
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**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 Wickham  
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Denis Brown  
RO0000363  
October 25, 2007  
Page 4

cc: Richard Garlow  
Delta Environmental Consultants, Inc.  
175 Bernal Road  
San Jose, CA 95119

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

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File



**Shell Oil Products US**

October 15, 2007

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Station  
7399 Johnson Drive  
Pleasanton, California 94588

**Subject: Shell-branded Service Station**  
3790 Hopyard Road  
Pleasanton, California  
*September 2007 Ground Water Discharge Self-Monitoring Report*  
Dublin San Ramon Services District Permit No. 02030

Dear Ms. Cigliuti:

During the current reporting period, the ground water treatment and extraction system at the subject site operated in compliance with the conditions specified in the above-referenced Dublin San Ramon Service District Industrial Wastewater Discharge Permit.

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my enquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I further certify that the sampling and analyses performed for and submitted with this report are representative of normal work cycles and expected pollutant discharges.

As always, feel free to contact me directly at (707) 865-0251 with any questions or concerns.

Sincerely,

**Shell Oil Products US**

A handwritten signature in black ink, appearing to read "Denis L. Brown", is written over a horizontal line.

Denis L. Brown  
Sr. Environmental Engineer  
HSE/Environmental Services

October 15, 2007  
Project Number: SJ37-90H-1.2007  
SAP # 98995842

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Section  
7399 Johnson Drive  
Pleasanton, California 94588

Re: **September 2007 Groundwater Discharge Self-Monitoring Report  
Shell-branded Service Station  
3790 Hopyard Road  
Pleasanton, California  
Incident # 98995842**



Dear Ms. Cigliuti:

Delta Environmental Consultants, Inc. (Delta), on behalf of Shell Oil Products US (Shell), has prepared the following *September 2007 Groundwater Discharge Self-Monitoring Report* for the above referenced site. The following is a summary of the groundwater extraction and treatment (GWET) system's performance during the month of September 2007. The GWET system was shutdown on May 4, 2006 on a trial basis with the approval the Alameda County Health Care Services Agency (see letter provided in the "April 2006 Groundwater Discharge Self-Monitoring Report"). Analytical results taken upon shutdown of the GWET system were presented in the "April 2006 Groundwater Discharge Self-Monitoring Report."

#### **ANTICIPATED FOURTH QUARTER 2007 ACTIVITIES**

Delta will prepare a fourth quarter 2007 groundwater monitoring report and continue shutdown of GWET system.

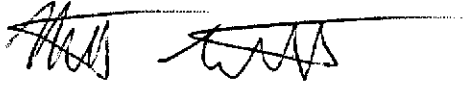
#### **REMARKS**

The recommendations and conclusions contained in this report represent Delta's professional opinions based upon the currently available information and are arrived at in accordance with currently acceptable professional standards. This report is based upon a specific scope of work requested by the client. The Contract between Delta and its client outlines the scope of work, and only those tasks specifically authorized by that contract or outlined in this report were performed. This report is intended only for the use of Delta's Client and anyone else specifically listed on this report. Delta will not and cannot be liable for unauthorized reliance by any other third party. Other than as contained in this paragraph, Delta makes no express or implied warranty as to the contents of this report.

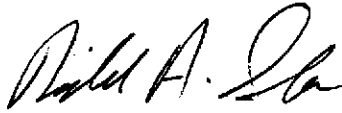
Ms. Ann Cigiuti  
Dublin San Ramon Services District  
October 15, 2007  
Page 2

Please call Denis L. Brown at (707) 865-0251 or Richard Garlow at (408) 826-1880 if you have any questions or comments.

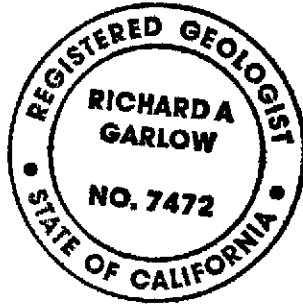
Sincerely,  
**Delta Environmental Consultants, Inc.**



Matt Lambert  
Staff Scientist



Richard Garlow, PG 7472  
Project Manager



cc: Denis L. Brown, Shell Oil Products US, Carson, CA  
Jerry Wickham, ACHCSA

20363

**TRANSMITTAL**

**TO:** Ms. Ann Cigliuti  
**COMPANY:** Dublin San Ramon Services District, Environmental Compliance Station  
**Address:** 7399 Johnson Drive, Pleasanton, CA 94588  
**DATE:** Oct 10, 2007

**PROJECT LOCATION:** 3790 Hopyard Road, Pleasanton, CA

**DELTA PROJECT NUMBER:** SJ37-90H-1.2007  
**ENCLOSED:**

1	Sept 2007 Groundwater Discharge Self-Monitoring Report dated Oct 10, 2007
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**SENT VIA:**

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<input type="checkbox"/>	Hand Delivery	First Priority Overnight	2-Day
<input type="checkbox"/>	Courier	Priority Overnight	Saver (3-day)
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**THESE ARE FOR:**

<input checked="" type="checkbox"/>	Use/Files
<input type="checkbox"/>	Approval
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<input type="checkbox"/>	Information

**MESSAGE:**

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Thank you,  
Rich Garlow

cc: Denis Brown, Shell Oil Products US  
Jerry Wickham, ACHCSA

**RECEIVED**

OCT 12 2007

ENVIRONMENTAL HEALTH SERVICES







**Shell Oil Products US**

September 15, 2007

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Station  
7399 Johnson Drive  
Pleasanton, California 94588

**Subject: Shell-branded Service Station**  
3790 Hopyard Road  
Pleasanton, California  
*August 2007 Ground Water Discharge Self-Monitoring Report*  
Dublin San Ramon Services District Permit No. 02030

Dear Ms. Cigliuti:

During the current reporting period, the ground water treatment and extraction system at the subject site operated in compliance with the conditions specified in the above-referenced Dublin San Ramon Service District Industrial Wastewater Discharge Permit.

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my enquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I further certify that the sampling and analyses performed for and submitted with this report are representative of normal work cycles and expected pollutant discharges.

As always, feel free to contact me directly at (707) 865-0251 with any questions or concerns.

Sincerely,

**Shell Oil Products US**

A handwritten signature in black ink, appearing to read "Denis L. Brown", is written over a horizontal line.

Denis L. Brown  
Sr. Environmental Engineer  
HSE/Environmental Services

September 15, 2007  
Project Number: SJ37-90H-1.2007  
SAP # 98995842

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Section  
7399 Johnson Drive  
Pleasanton, California 94588

Re: **August 2007 Groundwater Discharge Self-Monitoring Report  
Shell-branded Service Station  
3790 Hopyard Road  
Pleasanton, California  
Incident # 98995842**



Dear Ms. Cigliuti:

Delta Environmental Consultants, Inc. (Delta), on behalf of Shell Oil Products US (Shell), has prepared the following *August 2007 Groundwater Discharge Self-Monitoring Report* for the above referenced site. The following is a summary of the groundwater extraction and treatment (GWET) system's performance during the month of August 2007. The GWET system was shutdown on May 4, 2006 on a trial basis with the approval the Alameda County Health Care Services Agency (see letter provided in the "April 2006 Groundwater Discharge Self-Monitoring Report"). Analytical results taken upon shutdown of the GWET system were presented in the "April 2006 Groundwater Discharge Self-Monitoring Report."

#### **ANTICIPATED THIRD QUARTER 2007 ACTIVITIES**

Delta will prepare a third quarter 2007 groundwater monitoring report and continue shutdown of GWET system.

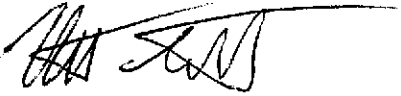
#### **REMARKS**

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Ms. Ann Cigiuti  
Dublin San Ramon Services District  
September 15, 2007  
Page 2

Please call Denis L. Brown at (707) 865-0251 or Tom Hargett at (408) 826-1868 if you have any questions or comments.

Sincerely,  
**Delta Environmental Consultants, Inc.**



Matt Lambert  
Staff Scientist



Tom Hargett, PG 5510  
Project Geologist



cc: Denis L. Brown, Shell Oil Products US, Carson, CA  
Jerry Wickham, ACHCSA

RO 363

**TRANSMITTAL**

SEP 18 2007

**TO:** Ms. Ann Cigliuti **Environmental Health**  
**COMPANY:** Dublin San Ramon Services District, Environmental Compliance Station  
**Address:** 7399 Johnson Drive, Pleasanton, CA 94588  
**DATE:** September 14, 2007

2007 SEP 18 09:45 AM '07

**PROJECT LOCATION:** 3790 Hopyard Road, Pleasanton, CA

**DELTA PROJECT NUMBER:** SJ37-90H-1.2007  
**ENCLOSED:**

1	Aug 2007 Groundwater Discharge Self-Monitoring Report dated Aug. 15, 2007
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**THESE ARE FOR:**

<input checked="" type="checkbox"/>	Use/Files
<input type="checkbox"/>	Approval
<input type="checkbox"/>	Review
<input type="checkbox"/>	Information

**MESSAGE:**

Thank you,  
Tom Hargett

cc: Denis Brown, Shell Oil Products US  
Jerry Wickham, ACHCSA





**Shell Oil Products US**

August 15, 2007

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Station  
7399 Johnson Drive  
Pleasanton, California 94588

**Subject: Shell-branded Service Station**  
3790 Hopyard Road  
Pleasanton, California  
*July 2007 Ground Water Discharge Self-Monitoring Report*  
Dublin San Ramon Services District Permit No. 02030

Dear Ms. Cigliuti:

During the current reporting period, the ground water treatment and extraction system at the subject site operated in compliance with the conditions specified in the above-referenced Dublin San Ramon Service District Industrial Wastewater Discharge Permit.

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my enquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

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As always, feel free to contact me directly at (707) 865-0251 with any questions or concerns.

Sincerely,

**Shell Oil Products US**

A handwritten signature in black ink, appearing to read "Denis L. Brown", is written over a horizontal line.

Denis L. Brown  
Sr. Environmental Engineer  
HSE/Environmental Services

August 15, 2007  
Project Number: SJ37-90H-1.2007  
SAP # 98995842

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Section  
7399 Johnson Drive  
Pleasanton, California 94588

**Re: July 2007 Groundwater Discharge Self-Monitoring Report  
Shell-branded Service Station  
3790 Hopyard Road  
Pleasanton, California  
Incident # 98995842**

Dear Ms. Cigliuti:

Delta Environmental Consultants, Inc. (Delta), on behalf of Shell Oil Products US (Shell), has prepared the following *July 2007 Groundwater Discharge Self-Monitoring Report* for the above referenced site. The following is a summary of the groundwater extraction and treatment (GWET) system's performance during the month of July 2007. The GWET system was shutdown on May 4, 2006 on a trial basis with the approval the Alameda County Health Care Services Agency (see letter provided in the "April 2006 Groundwater Discharge Self-Monitoring Report"). Analytical results taken upon shutdown of the GWET system were presented in the "April 2006 Groundwater Discharge Self-Monitoring Report."

#### **ANTICIPATED THIRD QUARTER 2007 ACTIVITIES**

Delta will prepare a third quarter 2007 groundwater monitoring report and continue shutdown of GWET system.

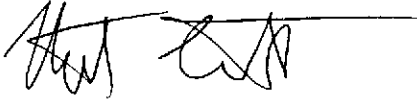
#### **REMARKS**

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Ms. Ann Cigiuti  
Dublin San Ramon Services District  
August 15, 2007  
Page 2

Please call Denis L. Brown at (707) 865-0251 or Tom Hargett at (408) 826-1868 if you have any questions or comments.

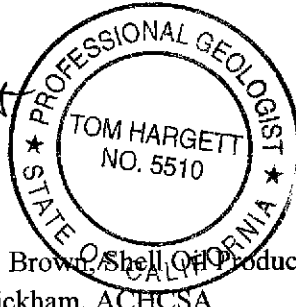
Sincerely,  
**Delta Environmental Consultants, Inc.**



Matt Lambert  
Staff Scientist



Tom Hargett, PG 5510  
Project Geologist



cc: Denis L. Brown, Shell Oil Products US, Carson, CA  
Jerry Wickham, ACHCSA

RO 363

**TRANSMITTAL**

2007 AUG 14 09:11:00

**TO:** Ms. Ann Cigliuti  
**COMPANY:** Dublin San Ramon Services District, Environmental Compliance Station  
**Address:** 7399 Johnson Drive, Pleasanton, CA 94588  
**DATE:** Aug 14, 2007

**PROJECT LOCATION:** 3790 Hopyard Road, Pleasanton, CA

**DELTA PROJECT NUMBER:** SJ37-90H-1.2007

**ENCLOSED:**

1	July 2007 Groundwater Discharge Self-Monitoring Report dated Aug. 15, 2007
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**SENT VIA:**

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<input type="checkbox"/>	Other	Standard Overnight	Ground

**THESE ARE FOR:**

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<input type="checkbox"/>	Approval
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<input type="checkbox"/>	Information

**MESSAGE:**

\_\_\_\_\_  
\_\_\_\_\_

Thank you,  
Matt Lampert

cc: Denis Brown, Shell Oil Products US  
Jerry Wickham, ACHCSA



RO 363

**TRANSMITTAL**

**TO:** Ms. Ann Cigliuti  
**COMPANY:** Dublin San Ramon Services District, Environmental Compliance Station  
**Address:** 7399 Johnson Drive, Pleasanton, CA 94588  
**DATE:** May 15, 2007

**PROJECT LOCATION:** 3790 Hopyard Road, Pleasanton, CA

**DELTA PROJECT NUMBER:** SJ37-90H-1.2007

**ENCLOSED:**

1	March 2007 Groundwater Discharge Self-Monitoring Report dated May 15, 2006
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**SENT VIA:**

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<input type="checkbox"/>	Other	Standard Overnight	Ground

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**MESSAGE:**

\_\_\_\_\_  
 \_\_\_\_\_

Thank you,  
Joe Rounds

cc: Denis Brown, Shell Oil Products US  
Jerry Wickham, ACHCSA

**RECEIVED**  
 MAY 15 2007

ENVIRONMENTAL HEALTH SERVICES

May 15, 2007

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Station  
7399 Johnson Drive  
Pleasanton, California 94588

**Subject: Shell-branded Service Station**  
3790 Hopyard Road  
Pleasanton, California  
*April 2007 Ground Water Discharge Self-Monitoring Report*  
Dublin San Ramon Services District Permit No. 02030

Dear Ms. Cigliuti:

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As always, feel free to contact me directly at (707) 865-0251 with any questions or concerns.

Sincerely,

**Shell Oil Products US**



Denis L. Brown  
Sr. Environmental Engineer  
HSE/Environmental Services

May 15, 2007  
Project Number: SJ37-90H-1.2007  
SAP # 98995842

Ms. Ann Cigliuti  
Dublin San Ramon Services District  
Environmental Compliance Section  
7399 Johnson Drive  
Pleasanton, California 94588

Re: **April 2007 Groundwater Discharge Self-Monitoring Report**  
**Shell-branded Service Station**  
**3790 Hopyard Road**  
**Pleasanton, California**  
**Incident # 98995842**



Dear Ms. Cigliuti:

Delta Environmental Consultants, Inc. (Delta), on behalf of Shell Oil Products US (Shell), has prepared the following *April 2007 Groundwater Discharge Self-Monitoring Report* for the above referenced site. The following is a summary of the groundwater extraction and treatment (GWET) system's performance during the month of April 2007. The GWET system was shutdown on May 4, 2006 on a trial basis with the approval the Alameda County Health Care Services Agency (see letter provided in the "April 2006 Groundwater Discharge Self-Monitoring Report"). Analytical results taken upon shutdown of the GWET system were presented in the "April 2006 Groundwater Discharge Self-Monitoring Report."

#### **ANTICIPATED SECOND QUARTER 2007 ACTIVITIES**

Delta will prepare a second quarter 2007 groundwater monitoring report and continue shutdown of GWET system.

#### **REMARKS**

The recommendations and conclusions contained in this report represent Delta's professional opinions based upon the currently available information and are arrived at in accordance with currently acceptable professional standards. This report is based upon a specific scope of work requested by the client. The Contract between Delta and its client outlines the scope of work, and only those tasks specifically authorized by that contract or outlined in this report were performed. This report is intended only for the use of Delta's Client and anyone else specifically listed on this report. Delta will not and cannot be liable for unauthorized reliance by any other third party. Other than as contained in this paragraph, Delta makes no express or implied warranty as to the contents of this report.

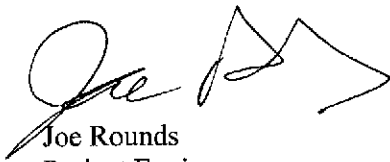
Ms. Ann Cigiuti  
Dublin San Ramon Services District  
May 15, 2007  
Page 2

Please call Denis L. Brown at (707) 865-0251 or Joe Rounds at (408) 826-1871 if you have any questions or comments.

Sincerely,  
**Delta Environmental Consultants, Inc.**



Matt Lambert  
Staff Scientist



Joe Rounds  
Project Engineer

cc: Denis L. Brown, Shell Oil Products US, Carson, CA  
Jerry Wickham, ACHCSA



May 14, 2007

Jerry Wickham  
Alameda County Health Care Services Agency  
Division of Environmental Protection, Local Oversight Program  
Department of Environmental Health  
1131 Harbor Bay Parkway, 2<sup>nd</sup> Floor  
Alameda, CA 94502

**Subject: Underground Tank Closure, one 550 gallon waste oil tank, Downtown Hopyard Shell #135784, 3790 Hopyard Rd., Pleasanton, CA 94588**

Dear Mr. Wickham:

I am requesting that your office oversee the site investigation and mitigation of contamination from Total Petroleum Hydrocarbons as Gasoline (TPHg) at 0.88 mg/kg, toluene at 0.0017 mg/kg, ethylbenzene at 0.010 mg/kg, xylene at 0.057 mg/kg, chromium at 52 mg/kg, lead at 8.0 mg/kg, nickel at 53. mg/kg, and zinc at 56 mg/kg detected in soil.

A ground water grab sample indicated: benzene at 0.67 ug/l, toluene at 0.75 ug/l, ethylbenzene at 0.73 ug/l, chromium at 47 ug/l, lead at 9.4 ug/l, nickel at 130. ug/l and benzoic acid at 32. ug/l in the tank excavation at the above site collected following removal of a waste oil tank.

I understand that this site has an active pump and treatment system to address a ground water problem at this location. We have received the results from the May 3, 2007 Underground Storage Tank Removal Report which indicate that contamination to soil and ground water is present and further investigation and mitigation may be needed. Please find a copy of the tank closure inspection report and unauthorized release contamination report from the consultant.

Thank you for your assistance on this project. If you have any questions, please feel free to contact me at (925) 454-2339.

Sincerely,

Paul M. Smith  
Hazardous Materials Inspector

cc:

- Bill Merchant, Shell Oil Products US, 4801 Laguna Blvd, Suite 105-290, Elk Grove, CA 95758
- Dennis Brown, Shell Oil Products US, 20945 S. Wilmington Ave, Carson, CA 90810
- Aubrey K. Cool, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A, Emeryville, CA 94608

3560 Nevada Street, Pleasanton, CA 94566

Administration & Suppression  
(925) 454-2361  
Fax 249-2397

CM.3.11.1 UST Closure Letter, Further Action  
Fire Prevention Bureau  
(925) 454-2361  
Fax 454-2367  
Rev. Date: 5/14/2007

**Wickham, Jerry, Env. Health**

---

**To:** Tom Hargett  
**Cc:** Rich Garlow  
**Subject:** Geotracker uploads

Tom,

Could you please check on Geotracker uploads for recent groundwater monitoring reports on the following Shell cases:

R02522  
~~R0363~~ 6750 Santa Rita Road, Pleasanton ACEH ftp upload but not on Geotracker  
R0363 C4226 First Street, Pleasanton ACEH ftp upload but not on Geotracker  
R0288 Z1801 Santa Rita Road, Pleasanton ACEH ftp upload but not on Geotracker  
R0363 3790 Hopyard Road, Pleasanton not on ACEH ftp or Geotracker

For clarification, report upload in electronic format to both the ACEH ftp site and Geotracker is required. Hard copy submittals are not required. I personally use hard copies for review and appreciate getting them but they do not go into our files.

Thanks,  
Jerry Wickham  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
510-567-6791 phone  
510-337-9335 fax  
[jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)

R0363

**Wickham, Jerry, Env. Health**

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**To:** Cool, Aubrey**Subject:** RE: 3790 Hopyard, Pleasanton - waste oil tank removal

Aubrey,

Based on the attached preliminary results, re-use of the pea gravel without overexcavation appears acceptable to me.

Regards,

*Jerry Wickham*

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502-6577

510-567-6791 phone

510-337-9335 fax

[jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)

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**From:** Cool, Aubrey [mailto:[ACool@croworld.com](mailto:ACool@croworld.com)]**Sent:** Tuesday, April 10, 2007 4:33 PM**To:** Wickham, Jerry, Env. Health**Subject:** 3790 Hopyard, Pleasanton - waste oil tank removal

Jerry:

We removed a waste oil tank at the referenced site on 2/14/07. I attached the soil and pea gravel results. Based on these results, we do not recommend over-excavation and we would like to re-use the pea gravel. Is that acceptable to you?

Regards,

Aubrey

**Aubrey Cool, PG****Conestoga-Rovers & Associates (CRA)**

5900 Hollis Street, Suite A

Emeryville, CA 94608

P. 510.420.3336

F. 510.420.9170

C. 707.333.0753

**CRA has acquired the former Cambria Environmental Technology, Inc.****Visit us at [www.croworld.com](http://www.croworld.com)**

4/12/2007

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT			
EMERGENCY <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> Yes <input type="checkbox"/> No	
REPORT DATE 3/7/2007		CASE #	
NAME OF INDIVIDUAL FILING REPORT Laura Sibley		PHONE (916) 240-1610	
REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> REGIONAL BOARD <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME Shell Oil Products US	
ADDRESS 20945 S. Wilmington Avenue Carson CA 90810			
NAME Shell Oil Products US		CONTACT PERSON Denis Brown	
ADDRESS 20945 S. Wilmington Avenue Carson CA 90810		PHONE (707) 865-0251	
FACILITY NAME (IF APPLICABLE) Shell-branded Service Station		OPERATOR Robert J. Wood	
ADDRESS 3790 Hopyard Road Pleasanton Alameda 94588		PHONE (925) 846-3223	
CROSS STREET Las Positas Boulevard			
LOCAL AGENCY AGENCY NAME Alameda County Health Care Services Agency		PHONE (510) 567-6791	
REGIONAL BOARD San Francisco Bay Region 2		PHONE (510) 622-2300	
(1) NAME Benzene - 0.67 ug/l (WO-W)		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> Unknown	
(2) NAME MTBE - 1.6 ug/l (WO-W)		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> Unknown	
DATE DISCOVERED 3/5/2007		HOW DISCOVERED <input type="checkbox"/> Tank Test <input checked="" type="checkbox"/> Tank Removal <input type="checkbox"/> Nuisance Conditions <input type="checkbox"/> Inventory Control <input type="checkbox"/> Subsurface Monitoring <input type="checkbox"/> Other	
DATE DISCHARGE BEGAN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> Remove Contents <input checked="" type="checkbox"/> Close Tank <input type="checkbox"/> Repair Tank <input type="checkbox"/> Change Procedure <input type="checkbox"/> Replace Tank <input type="checkbox"/> Other <input type="checkbox"/> Repair Piping	
HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 2/14/2007		<input checked="" type="checkbox"/> UNKNOWN	
SOURCE/CAUSE <input type="checkbox"/> Tank Leak <input type="checkbox"/> Piping Leak <input checked="" type="checkbox"/> Unknown <input type="checkbox"/> Other		CAUSE(S) <input type="checkbox"/> Overfill <input type="checkbox"/> Corrosion <input type="checkbox"/> Rupture/Failure <input checked="" type="checkbox"/> Unknown <input type="checkbox"/> Spill <input type="checkbox"/> Other	
CHECK ONE ONLY <input type="checkbox"/> Undetermined <input type="checkbox"/> Soil Only <input checked="" type="checkbox"/> Groundwater <input type="checkbox"/> Drinking Water - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)			
CHECK ONE ONLY <input checked="" type="checkbox"/> No Action Taken <input type="checkbox"/> Case Closed (Cleanup Completed or Unnecessary) <input type="checkbox"/> Leak Being Confirmed <input type="checkbox"/> Pollution Characterization <input type="checkbox"/> Remediation Plan <input type="checkbox"/> Post Cleanup Monitoring In Progress <input type="checkbox"/> Preliminary Site Assessment Workplan Submitted <input type="checkbox"/> Cleanup Underway <input type="checkbox"/> Preliminary Site Assessment Underway			
CHECK APPROPRIATE ACTION(S) <input type="checkbox"/> Cap Site (CD) <input type="checkbox"/> Excavate & Treat (ET) <input type="checkbox"/> Treatment At Hookup (HU) <input checked="" type="checkbox"/> Other - pending agency evaluation <input type="checkbox"/> Contamination Barrier (CB) <input type="checkbox"/> No Action Required (NA) <input type="checkbox"/> Enhanced Bio Degradation (IT) <input type="checkbox"/> Vacuum Extract (VE) <input type="checkbox"/> Remove Free Product (FP) <input type="checkbox"/> Replace Supply (RS) <input type="checkbox"/> Excavate & Dispose (ED) <input type="checkbox"/> Pump & Treat Groundwater (GT) <input type="checkbox"/> Vent Soil (VS)			
COMMENTS Soil and groundwater concentrations were found during waste oil tank removal activities including TPH gasoline, benzene, toluene, ethylbenzene, xylenes, MTBE, chromium, lead, nickel, and zinc. Cambria Environmental Technology, Inc. notified the Livermore-Pleasanton Fire Department on 3/6/2007 at 11:05 AM. Cambria left a voice mail for inspector Paul Smith. A report documenting the reported findings will be submitted to the agency within 60 days.			



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



7

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

April 26, 2006

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

Subject: Fuel Leak Case No. [REDACTED] Shell#13-5784, 3790 Hopyard Road, Pleasanton, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Remediation System Shutdown Request," dated April 3, 2006, prepared on Shell's behalf by Delta Environmental Consultants, Inc. The report summarizes the performance of the groundwater extraction system and assesses the distribution of MTBE and TBA in groundwater. Based on the low concentrations of fuel hydrocarbons detected in on-site monitoring and extraction wells, the report concludes that hydraulic control of MTBE migration is no longer needed. The report also concludes that the off-site MTBE and TBA plumes are stable or shrinking. A trial shutdown of the groundwater extraction system is requested by Delta on behalf of Shell. ACEH concurs with the trial shutdown of the groundwater extraction system. Please maintain all operating and discharge permits as active until permanent shutdown of the groundwater extraction system is requested and approved. An evaluation of plume migration and the need to re-start the groundwater extraction system is to be included in each quarterly monitoring report requested below.

ACEH requests that you perform the proposed work and send us the reports described below.

**TECHNICAL REPORT REQUEST**

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

- **August 15, 2006** – Quarterly Monitoring Report for the Second Quarter 2006
- **November 15, 2006** – Quarterly Monitoring Report for the Third Quarter 2006
- **February 15, 2007** – Quarterly Monitoring Report for the Fourth Quarter 2006

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

### 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](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](mailto: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**

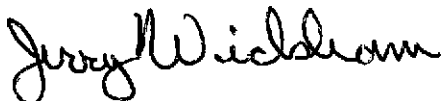
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**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  
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

R0363

**Wickham, Jerry, Env. Health**

---

**To:** Lee Dooley  
**Cc:** denis.l.brown@shell.com; Heather Buckingham  
**Subject:** RE: Shell Service Station, 3790 Hopyard Road, Pleasanton

Lee,

Thanks for sending the data over. Good results on the deeper samples! The proposed depths for the S-9 well cluster and the first sand layer in well MW-5 look good. Based on CPT-05a, I suggest moving the screen interval for the second sand layer in the MW-5 well cluster up about 3 feet to 73-77 feet bgs as noted below.

Regards,

*Jerry Wickham*

Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Suite 250  
Alameda, CA 94502-6577  
510-567-6791 phone  
510-337-9335 Fax  
[jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)

---

**From:** Lee Dooley [<mailto:ldooley@deltaenv.com>]  
**Sent:** Monday, October 03, 2005 4:19 PM  
**To:** Wickham, Jerry, Env. Health  
**Cc:** denis.l.brown@shell.com; Heather Buckingham  
**Subject:** Shell Service Station, 3790 Hopyard Road, Pleasanton

Lee Dooley  
Senior Engineer, CE  
Delta Environmental  
3790 Hopyard Road  
Pleasanton, CA 94566  
510-337-9335

Jerry,

I would appreciate your review and approval of our well cluster proposal outlined below. In our work plan dated June 24, 2005, Delta proposed to install two well clusters (one onsite and one offsite downgradient). The depths and wells screens of the clusters were to be based on a deep CPT boring located adjacent to on-site Well MW-5 and a shallower CPT adjacent to Well S-9. The CPT S-5 was drilled on September 9, 2005. The CPT logs from both borings are attached. Groundwater samples were collected from the S-5 CPT boring at depths of 65 and 78 feet below grade (bg). Laboratory reports are attached. MTBE was found in the 65 foot sample at 1.4 ug/l and was below the laboratory reporting limit in the deeper sample.

I propose the following well cluster construction;

**MW-5 WELL CLUSTER**

- Existing Well S-5 screened in first encountered groundwater from 6 to 36 feet bg (current depth to gw is 19.71 feet)
- New monitoring well screened from 58 to 62 feet bg across first sand layer (see CPT-5A) Ok
- New monitoring well screened from 76 to 80 feet bg across the second sand layer (see CPT-5A) Suggest 73-77 feet bg

**S-9 WELL CLUSTER**

- Existing Well S-9 screened in first encountered groundwater from 10 to 35 feet bg (current depth to gw is 20.09 feet)

10/4/2005

- New monitoring well screened from 56 to 60 feet bg across first sand layer (see CPT-10) OK
- New monitoring well screened from 73 to 77 feet bg across the second sand layer (see CPT-10) OK

Groundwater samples from CPT-10 at 62-64 feet bg and 76 to 80 feet bg did not contain any petroleum hydrocarbons or fuel oxygenates. We are also proceeding with getting the permits for installation of the three wells along Arroyo Macho Canal. Well installations (clusters and canal wells) are scheduled for the week of October 23, 2005. Thanks for your help on this!

R. Lee Dooley  
DELTA ENVIRONMENTAL CONSULTANTS, INC.  
175 Bernal Road, Suite 200  
San Jose, CA 95119  
Phone: 408.224.4724  
Cell: 408.656.2505

**Confidentiality Notice:** This email and document(s) accompanying this email contains confidential information that is legally privileged. This information is intended for the use of the intended recipient(s) named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this email and its attachments, except its direct delivery to the intended recipient(s) named above, is strictly prohibited. If you have received this email in error, please notify us immediately by telephone.

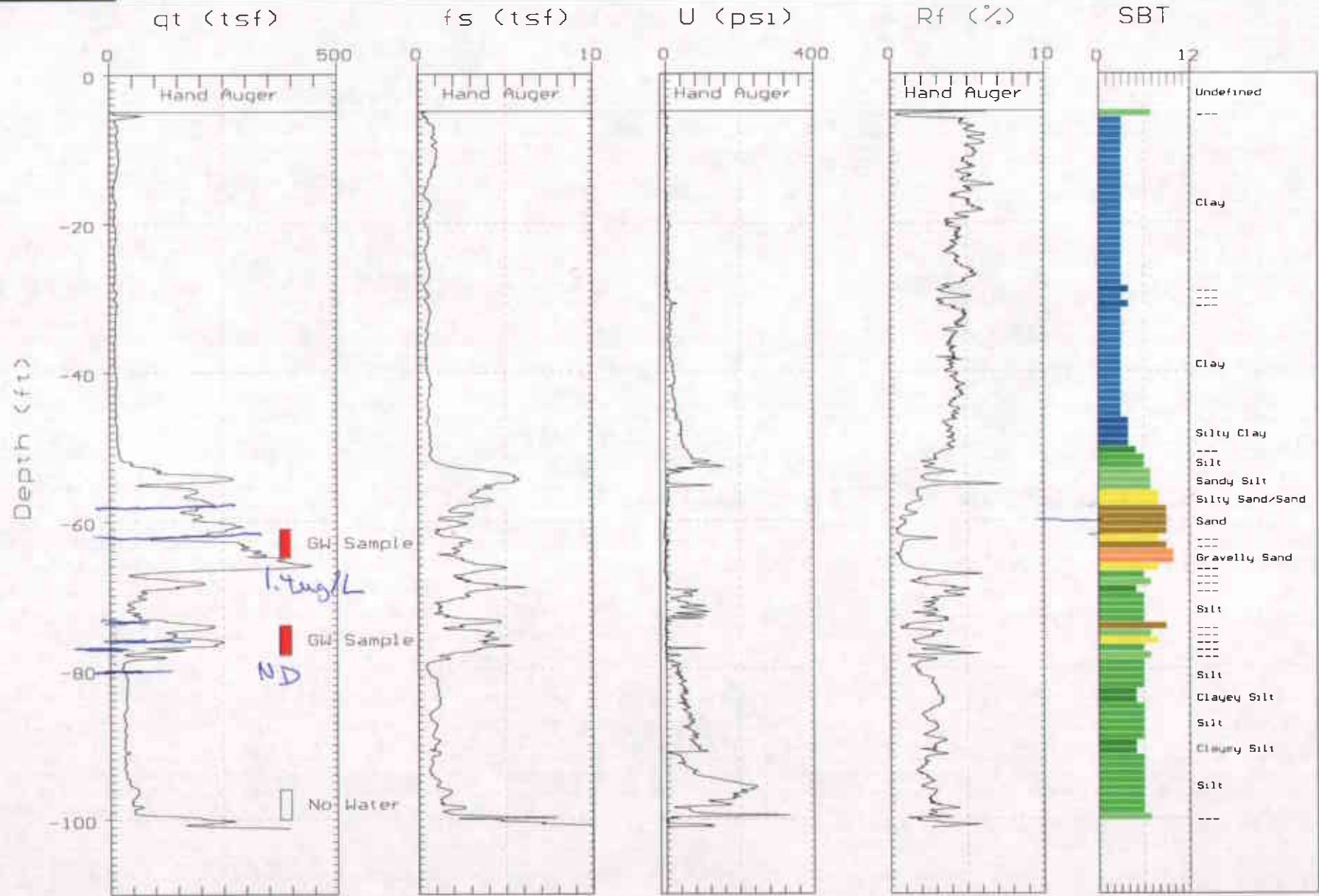
10/4/2005



DELTA ENV.

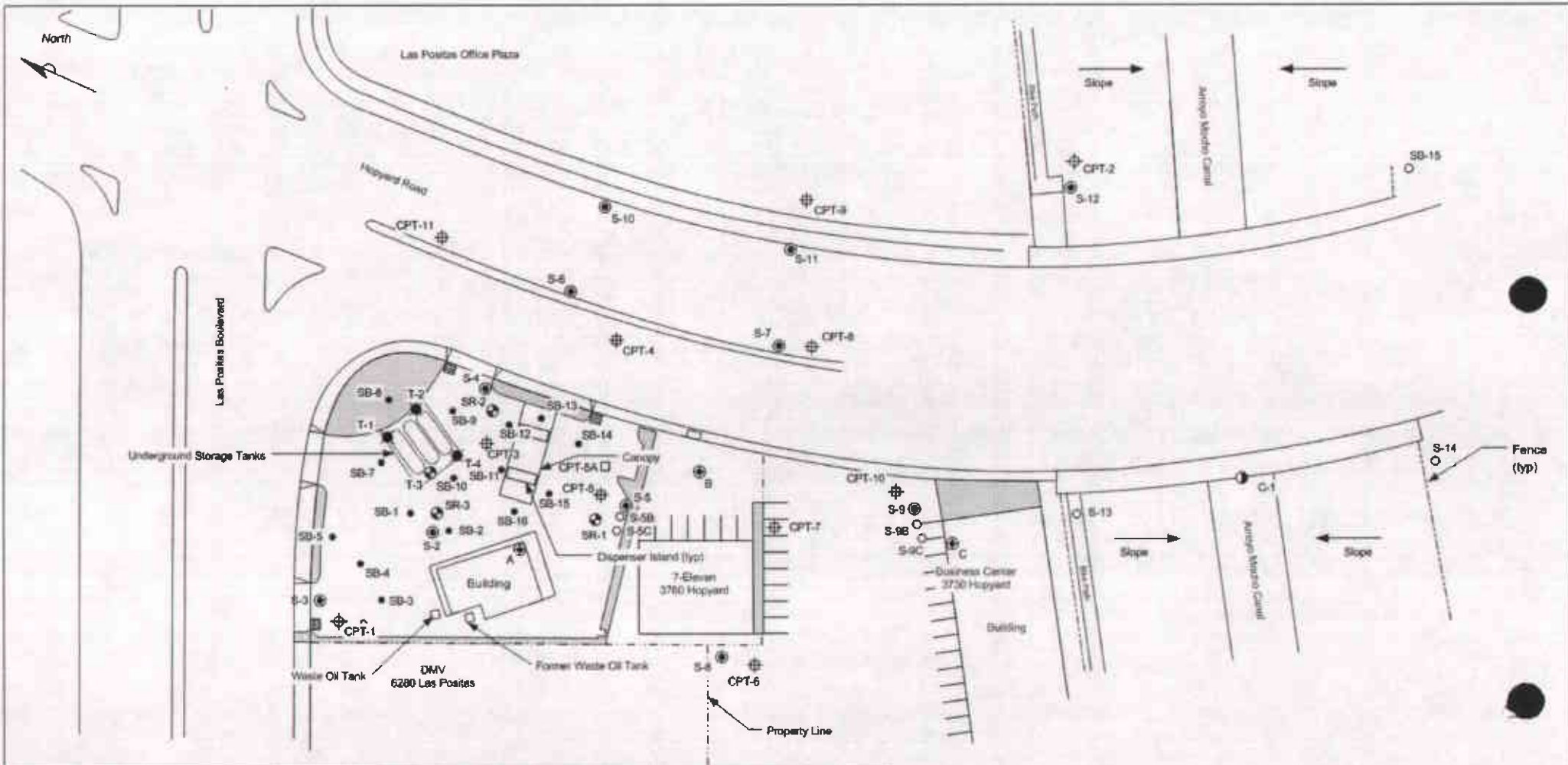
Site: 3790 HOPYARD RD.  
Location: CPT-05a

Engineer: H.BUCKINGHAM  
Date: 09:09:05 10:15



Max. Depth: 101.25 (ft)  
Depth Inc.: 0.066 (ft)

SBT: Soil Behavior Type (Robertson 1990)



**LEGEND**

- SB-3 ● SOIL BORING LOCATION (OCTOBER 2004)
- S-6 ● GROUNDWATER MONITORING WELL
- SR-1 ● GROUNDWATER RECOVERY WELL
- T-1 ● TANK BACKFILL WELL
- C-1 ● CREEK GAUGING LOCATION
- CPT-1 ⊕ CPT SAMPLING LOCATION (CPT-1 7/28/02; CPT-2 11/25/02)
- CPT-5 ⊕ CPT SAMPLING LOCATION, FEBRUARY 2005

- ⊕ APPROXIMATE LOCATION OF ABANDONED IRRIGATION WELL 3S21E-7Q1
- PROPOSED CPT SAMPLING LOCATION
- PROPOSED WELL LOCATIONS
- A ● LOCATION FROM ZONE 7 WATER AGENCY WELL LOCATION MAP, DATED 5/1/02
- B ● LOCATION BASED ON USGS DUBLIN 7 1/4 MINUTE TOPOGRAPHIC QUADRANGLE
- C ● LOCATION BASED ON DESCRIPTION FROM CALIFORNIA DEPARTMENT OF WATER RESOURCES, WELL DATA FORM, DATED 10/22/59



FIGURE 2  
CPT BORING, SOIL BORING, AND WELL LOCATION MAP  
SHELL-BRANDED SERVICE STATION  
3790 Hopyard Road  
Pleasanton, California

PROJECT NO. SUT-SOH-1-2005	DRAWN BY V. F. 2/05
FILE NO. SUT-SOH-1-2005	PREPARED BY V. F.
REVISION NO. 2	REVIEWED BY



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



7

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

July 28, 2005

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

Subject: Fuel Leak Case No. ~~AC00000263~~, Shell #13-5784, 3790 Hopyard Road, Pleasanton, CA  
– Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Agency Response and Revised Work Plan," dated June 24, 2005 and "Quarterly Groundwater Monitoring Report – Second Quarter 2005," dated July 15, 2005 for the Shell service station at 3790 Hopyard Road, Pleasanton. Both documents were prepared on behalf of Shell by Delta Environmental Consultants, Inc. The Work Plan presents responses to technical comments provided by ACEH in correspondence dated April 26, 2005. The Work Plan proposes additional CPT borings, a well cluster in the area of existing well S-5, a well cluster in the area of existing well S-9, installation of three monitoring wells along the Arroyo Mocho Canal, development and sampling of all new wells, and surveying of the wells. The Quarterly Monitoring Report – Second Quarter 2005 presents results from groundwater monitoring conducted on April 24, 2005 and provides results from operation of the groundwater extraction (GWE) system at the site.

We concur with the scope of work proposed in the Work Plan. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance notification to ACEH prior to initiating field sampling activities.

**TECHNICAL COMMENTS**

1. **Proposed Sampling Locations.** We concur with the CPT, boring, and well locations as proposed in the Work Plan.
2. **GWE System Operation and TBA Concentrations in System Influent.** The Work Plan requests discontinuing GWE on a trial basis. Because the GWE system provides hydraulic control to limit the migration of MTBE in groundwater and continues to remove TPH and oxygenates, ACEH does not concur with discontinuing groundwater extraction at this time. Discontinuing GWE may be considered following completion of site characterization and evaluation of the need for continued hydraulic control of MTBE plume migration. Therefore, please continue operation of the GWE system and analyze the system influent for TBA. These results are to be presented in the Quarterly Monitoring Reports requested below.



3. **Well Screen Intervals.** Based on the responses provided, modifications of existing wells are not required at this time.

### **TECHNICAL REPORT REQUEST**

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

- **November 15, 2005** - Quarterly Monitoring Report for the Third Quarter 2005
- **November 22, 2005** – Soil and Groundwater Investigation Report
- **February 15, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2005

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.

### **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 that all technical reports submitted for this fuel leak case meet this requirement.

### **UNDERGROUND STORAGE TANK CLEANUP FUND**

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

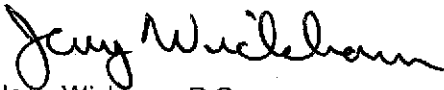
Mr. Denis Brown  
July 28, 2005  
Page 3

**AGENCY OVERSIGHT**

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

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

Sincerely,



Jerry Wickham, P.G.  
Hazardous Materials Specialist

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

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

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

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES



7

AGENCY

DAVID J. KEARS, Agency Director

April 26, 2005

Denis L. Brown  
Sr. Environmental Engineer  
Shell Oil Products US  
20945 S. Wilmington Ave.  
Carson, CA 90810

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. [REDACTED] Shell Service Station #13-5784, 3790 Hopyard Rd., Pleasanton, California - Response to Reports

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) has reviewed the recent reports and the case file for the above-referenced site. Recent reports for the site include:

- Your December 8, 2004 letter;
- *Fourth Quarter 2004 Groundwater Monitoring Report*, dated January 14, 2005, prepared by Cambria Environmental Technology, Inc.;
- *Subsurface Investigation Report*, dated February 8, 2005, prepared by Cambria Environmental Technology, Inc.;
- *CPT Soil and Groundwater Investigation Report*, dated March 24, 2005, prepared by Delta Environmental Consultants, Inc.; and
- *Quarterly Groundwater Monitoring Report - First Quarter 2005*, dated April 15, 2005, prepared by Delta.

As described in the above-listed reports, Delta advanced 8 CPT soil boring pairs to 80 ft bgs and one CPT soil boring pair to 35 ft bgs at and downgradient of the site to evaluate the site lithology and to collect groundwater samples for TPHg, BTEX, MTBE and TBA analysis. Cambria advanced 15 onsite soil borings to help constrain the locations of source area contamination. Completion of the multi-level investigation and submittal of the referenced reports represents significant improvement in site characterization. In response to the recent findings, Delta recommends drilling and sampling of one soil boring to 120 ft and installation of two well clusters (or multi-level monitoring wells). We concur with Delta's recommendations in the March 24, 2005, report. Please submit a workplan for soil and groundwater investigation following the schedule below. In addition, we request that your workplan address the following technical comments.

#### TECHNICAL COMMENTS

On April 25, 2005, Shell, Delta and ACEH discussed investigation and remediation needs at the site. This letter memorializes key aspects of the telephone conversation. Completion of the groundwater sampling recommended by Delta in the March 24, 2005, report and protection of deeper groundwater is the highest priority; however, additional evaluation of shallow groundwater is also required. MTBE at 340 ug/L was detected in downgradient well S-9 during the most recent monitoring event on January 6, 2005. ACEH is concerned by the distance

MTBE has traveled from the site and by the apparent rate of travel through what Delta has characterized as an extensive clay layer.

#### 1. Downgradient Groundwater Investigation

MTBE concentrations increase with distance downgradient of your site. MTBE has been detected in wells S-9 (230 ft from the site) and in well S-12 (350 ft from the site). Both well S-9 and well S-12 are screened within the shallow clay zone identified by Delta. The downgradient increase in dissolved MTBE concentrations is anticipated because Shell has performed groundwater extraction onsite to reduce groundwater concentrations. However, further delineation of the lateral extent of groundwater contamination appears necessary. As discussed on April 25, 2005, grab groundwater sampling and installation of at least one additional monitoring well across the Arroyo Mocho Canal and on the west side of Hopyard Road is recommended. Please submit a sampling and analysis plan which addresses this concern in the workplan requested below.

#### 2. Biodegradation of MTBE and TBA

In Shell's December 8, 2004, letter to ACEH, you state that the increase in TBA concentrations is sufficient evidence that biological degradation of MTBE is occurring. ACEH agrees that MTBE in the source area appears to be degrading to TBA. Due to the presence of TPHg and BTEX in the source area, source area geochemical conditions may be different from downgradient conditions where TPHg and BTEX have not been detected.

In downgradient well S-9, MTBE concentrations have ranged from 210 ug/L to 340 ug/L since March 2003. No TBA has ever been detected in this well; however, 11 ug/L TBA was detected in CPT-10 between 20 and 38 ft bgs. MTBE has been detected in well S-12, but no TBA has ever been detected in this well. Please evaluate TBA concentration trends downgradient of the site and propose any necessary sampling or analysis to verify that MTBE is degrading downgradient of the source area.

Shell's November 3, 2004, presentation to the LARWQCB states that under methanogenic conditions TBA appears recalcitrant. Since onsite TBA concentrations remain high (6,500 ug/L TBA was detected in well S-4 on January 6, 2005) and because Shell would like to discontinue active remediation at the site, confirmation that TBA is biodegrading is necessary. Please present an analysis of TBA concentrations and propose any necessary tasks to confirm TBA degradation in the workplan requested below.

#### 3. TBA Concentrations in System Influent

Please analyze groundwater extraction system influent for TBA during future routine sampling events. The results will be used to assess the efficacy of the remediation system. Please report your results in the future quarterly reports.

#### 4. Well Screening Intervals

A number of monitoring wells at this site have long well screens. The sand pack interval for certain wells is over 30 ft. ACEH has the following concerns regarding long-screened wells:

- Longer well screens could potentially intercept two water bearing horizons, leading to potential cross-contamination or a diluted groundwater sample,

- Long-screened wells, even when screened within a hydraulically distinct unit, may experience vertical gradients and consequently produce faulty potentiometric surface data and/or faulty concentration data; and
- Long-screened wells produce composite samples that may not be representative of the zone that poses a potential threat to receptors (i.e. for the indoor air pathway, water table surface concentrations are of greater concern than submerged zone concentrations, and for well impacts the zone exhibiting highest velocity may be of primary concern).

These concerns are based on the County staff's experience and have been detailed in a number of academic and professional studies, including Elci et al, 2001; Elci, 2003; Robbins, 1997; and Mcilvrde & Rector, 1988.

Please evaluate well screening intervals for all wells at this site. If necessary to address ACEH's concerns listed above, please propose appropriate well modifications or replacements in the workplan requested below. In all future quarterly reports, please include well screening intervals in your summary groundwater data table.

#### REPORT REQUEST

Please submit your *Soil and Water Investigation Workplan* which addresses the comments above, by **June 26, 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

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

Sincerely,



Robert W. Schultz, P.G.  
Hazardous Materials Specialist

Cc: Lee Dooley, Delta Environmental Consultants, Inc., 175 Bernal Road, Ste. 200, San Jose, CA 95476  
Matt Katen, Zone 7 Water District, QIC 90201  
Donna Drogos, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

December 20, 2004

Harold N. Sweet  
C. Antionette Sweet Blankenship  
P.O. Box 4174  
Modesto, CA 95352

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

Subject: Property Access by the Parties Responsible for the Investigation and Cleanup of Petroleum Hydrocarbon and Fuel Oxygenate Pollution at Fuel Leak Case No. RO0000363, Shell Service Station #13-5784, 3790 Hopyard Rd., Pleasanton, California

Dear Property Owner:

Alameda County Environmental Health (ACEH) is overseeing the investigation and cleanup of gasoline, including the gasoline compounds Methyl tert-Butyl Ether (MTBE) and benzene, released from fuel underground storage tanks at the subject site. We are uncertain as to how far the contamination from those tanks has moved.

ACEH is requiring Shell Oil Products US to investigate and clean up contaminated soil and groundwater at the site to prevent the gasoline, MTBE, and benzene contamination from spreading to other properties or to drinking water sources, and to reduce the potential threat to human health and the environment. To properly determine the extent of that contamination in groundwater, Shell must perform additional off-site investigation. Therefore, we need your help in allowing access to your property by Shell to properly define the extent of contamination.

If you have any questions, please contact Karen Petryna of Shell Oil Products US at (559) 645-9306. Thank you for your cooperation.

Sincerely,

Robert W. Schultz, R.G.  
Hazardous Materials Specialist

cc: Karen Petryna, Sr. Environmental Engineer, Shell Oil Products US, 20945 S. Wilmington Ave., Carson, CA 90810  
D. Drogos, R. Schultz

ALAMEDA COUNTY  
~~Schultz, Robert, Env. Health~~  
~~HEALTH CARE SERVICES~~



From: Holli Adams [mailto:Holli.Adams@strasburger.com]  
Sent: Monday, December 20, 2004 12:13 PM  
To: DAVID J. KEARNS, Agency Director; Schultz, Robert, Env. Health  
Cc: KHilli01@7-11.com; KEPetryna@ShellOPUS.com; AGENCY ENVIRONMENTAL HEALTH SERVICES  
Subject: Re: 3760 Hopyard, Pleasanton

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

Dear Mr. Schultz:

Thank you for your e-mail. We have not been in contact with the property owner, Mr. Sweet, other than to forward the information from Shell to him. 7-Eleven generally relies on the party seeking access to contact and follow-up with the property owner on sites that 7-Eleven leases. We certainly would have no objection to you calling Mr. Sweet to explain the situation to him, and had assumed that Shell had been in contact with him already. 7-Eleven has not heard anything from Mr. Sweet in this case, but has already signed the access agreement. We do not have a phone number for the property owner, but the address we have is:

Harold N. Sweet  
C. Antionette Sweet Blankenship  
P.O. Box 4174  
Modesto, CA 95352

Please feel free to contact me should you have additional questions. Thanks and have a great holiday season!!

Holli Adams  
Legal Assistant  
Strasburger & Price, LLP  
214/651-4570 (phone)  
214/651-4330 (fax)  
holli.adams@strasburger.com

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>>> "Schultz, Robert, Env. Health" <robert.schultz@acgov.org> 12/15/04 01:19PM >>>

Dear Ms. Adams:

As you are aware, Shell Oil Products US is in the process of investigating groundwater contamination from their service station at 3790 Hopyard Rd. Shell's consultant forwarded your contact information to me as part of their weekly updates on efforts to obtain access to perform offsite investigation. I understand that 7-11 and Shell have agreed on terms of access to the property at 3760 Hopyard Rd., however, you may be awaiting response/input from the property owner, Harold N. Sweet of Modesto, CA. Would you please email me an update on the status of Mr. Sweet's response to your requests? If necessary, I am available to assist in educating Mr. Sweet of the project's objectives and in obtaining his approval.

Thank you,  
Bob Schultz

\*\*\*\*\*  
Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



December 9, 2004

Cranbrook Realty Investment Fund LP  
Attn. Jim Davenport  
4701 Sisk Rd., Ste. 101  
Modesto, CA 95356

ENVIRONMENTAL HEALTH SERVICES

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

Subject: Property Access by the Parties Responsible for the Investigation and Cleanup of Petroleum Hydrocarbon and Fuel Oxygenate Pollution at Fuel Leak Case No. RO0000363, Shell Service Station #13-5784, 3790 Hopyard Rd., Pleasanton, California

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ACEH is requiring Shell Oil Products US to investigate and clean up contaminated soil and groundwater at the site to prevent the gasoline, MTBE, and benzene contamination from spreading to other properties or to drinking water sources, and to reduce the potential threat to human health and the environment. To properly determine the extent of that contamination in groundwater, Shell must perform additional off-site investigation. Therefore, we need your help in allowing access to your property by Shell to properly define the extent of contamination.

If you have any questions, please contact Karen Petryna of Shell Oil Products US at (559) 645-9306. Thank you for your cooperation.

Sincerely,

Robert W. Schultz, R.G.  
Hazardous Materials Specialist

cc: Karen Petryna, Sr. Environmental Engineer, Shell Oil Products US, 20945 S. Wilmington Ave., Carson, CA 90810  
D. Drogos, R. Schultz





*Via electronic mail—hardcopy to follow by U.S. mail*

December 8, 2004

Alameda County  
DEC 18 2004  
Environmental Health

Donna L. Drogos, P.E.  
Supervising Hazardous Materials Specialist  
Department of Environmental Health  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577

**RE: Shell-ACEH Meeting on November 4, 2004**

Dear Ms. Drogos:

This letter is offered to document the requests and statements made at the subject meeting and also to inform you we are in the process of producing a prioritized list of our cases in Alameda County Environmental Health (ACEH) jurisdiction.

You requested the following:

1. Shell is to provide you with a list of our open environmental cases in ACEH's jurisdiction in the order that Shell would like them addressed by ACEH.
2. Shell is to provide ACEH with a regularly updated spreadsheet of all our open environmental cases' site data and status, the format for which has not yet been established, pending completion of an ACEH database.
3. Shell is to provide 2-3 day notification, by email, of scheduled field work.<sup>1</sup>
4. Shell is to provide a list of property owners whose real property we propose accessing for investigation purposes as soon as we receive work plan approval from ACEH.
5. In the case of closure requests, ACEH would like a "package" with confirmation from Shell that the subject case is Shell's number one priority for closure.
6. ACEH caseworkers assigned to Shell sites do not want to be contacted by phone for inquiries regarding the status of review of submitted work plans and reports.
7. Requests for extensions to due dates for reports and work plans should be made via email to the ACEH caseworker. These requests may be made by Shell's consultant who must copy Shell.
8. All reports submitted to ACEH should include recommendations and plans for future work.

In our meeting, you indicated you would provide Shell with the following:

1. Standard form that we should attach to future submittals which identifies the type of report enclosed as well as the site's real property owner, who should also be copied.
2. List of fields you will be populating in the database you are developing.

---

<sup>1</sup> Please let us know who we should notify by email and, if it is the ACEH-assigned caseworker, who we should notify when none is assigned.

*Via electronic mail—hardcopy to follow by U.S. mail*

December 8, 2004

Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Department of Environmental Health  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502-6577

Alameda County  
DEC 18 2004  
Environmental Health

**RE: Shell-branded Service Station at 3790 Hopyard Road, Pleasanton, California**

Dear Mr. Schultz:

Thank you for taking the time to meet with my supervisor, Karen Lyons, and me on November 4, 2004. As agreed at that meeting, this correspondence was to be prepared in order to describe the work that Shell is planning to perform for the subject location's environmental case. In addition, a chronology of correspondence and activities and a detail Shell's position for this case is provided.

While preparing this correspondence, I received your November 13, 2004 *Technical Report Late Letter*. I was surprised to receive this letter, as Cambria had requested an extension on behalf of Shell in correspondence dated September 30, 2004 for the work proposed in the June 30, 2004 work plan conditionally approved in your August 13, 2004 letter. In the September 30, 2004 correspondence, and in subsequent written and verbal communication with you, Cambria and Shell have stated that the offsite work cannot be completed until access agreements with offsite property owners have been executed. Shell cannot legally enter private properties to perform any activities without explicit permission from the property owner. The onsite portion of the investigation was scheduled as early as possible once we received agency approval. However, based on the lack of availability of Shell-approved contractors, the earliest date we could schedule the performance of the onsite work was the week of October 4 – 8, 2004. Given that the work would not be performed until the week prior to the due date, it was obvious that the submittal date could not be met and an extension would be needed.

In the September 30, 2004 letter requesting an extension, Cambria did propose submitting a report of findings for the onsite work by December 7, 2004. They stated that since the offsite CPT work could not be performed until access agreements had been executed, they could not provide a timeframe for completing or reporting that work. In an email response on October 6, 2004, you

stated that no rationale had been provided supporting the delay. However, the information in Cambria's letter made clear that, due to scheduling difficulties, there would be no analytical data to report by the report submittal date of October 13, 2004. An alternate submittal date for the technical report of the portion of the fieldwork that could legally be performed, was then provided - December 7, 2004. Also, the letter made it clear that without executed access agreements to offsite parcels, the offsite work could not be completed, or even scheduled; therefore, Cambria did not make a recommendation for submittal of the report for the CPT work.

After receiving your October 6, 2004 email, I responded on October 14, 2004, and let you know that the onsite work had indeed been completed, and again stated that we could provide the technical report of these activities by December 7, 2004. I notified you that we had not heard from any of the three offsite property owners regarding our request for access. I also informed you that one of the access agreements was returned to Cambria because the owner information listed at the Assessor's office was incorrect. The correct owner information was obtained during the October 4 - 8 field activities by visiting the parcel in person. A new access agreement for that property owner was forwarded the following week. I also stated that we would keep you updated as to the progress of the access agreements, the latest of which was forwarded to you on December 2, 2004.

In an October 18, 2004 email from you, you stated that you did not want a report of the onsite activities, but preferred a single report including both onsite source area investigation and down gradient groundwater investigation.

It was at this point, based on your August 13, 2004 conditional approval of our proposed work and in subsequent communications regarding access issues, that it became obvious to me that a meeting to discuss this project would be beneficial, and I requested a meeting with Shell, Cambria, Alameda County Environmental Health (ACEH), Zone 7 Water Agency, and the Regional Water Quality Control Board be conducted. Instead, at ACEH's request, a meeting including only Shell and ACEH was scheduled (November 4, 2004) with the intent, according to ACEH, of establishing a list of all of Shell's cases in their jurisdiction. In my email on November 3, 2004, Shell again requested that a meeting be held specifically to discuss the subject site. We requested that the meeting include not only Shell and ACEH, but also our consultant (Cambria), and representatives from Zone 7 and the RWQCB. In response, you stated that you wanted to develop a better understanding of Shell's position and then evaluate the need for a follow-up site-specific meeting. Then, during our November 4, 2004 meeting, ACEH declined to participate in such a meeting, and stated that Shell had an approved work plan. As Shell stated in the November 4 meeting, we are ready and willing to perform the work we proposed in our June 30, 2004 work plan, but we do not agree with the conditions ACEH imposed with work plan approval or with conducting additional work previously contemplated or requested.

### **Summary of Correspondence between February 2003 and Present**

In your email correspondence dated October 6, 2004, and again in your letter dated November 13, 2004, you reference that Shell is to complete all of the work outlined in directives dating back to February 27, 2003. ACEH's February 27, 2003 letter requested a number of items and that a work plan be prepared to address the technical comments. On behalf of Shell, Cambria submitted the requested work plan dated April 30, 2003. In addition to addressing each of the technical comments, Cambria recommended a phased approach to the investigation by first performing CPT borings (8 clusters to 40 fbg, and 2 clusters to 75 fbg). Cambria stated that the installation of requested groundwater monitoring wells in multiple zones would be decided upon after the initial investigation had been completed. Shell and Cambria were prepared to move forward on this scope of work; however, Shell did not receive a response from the ACEH for more than a year.

In the meantime, Shell proceeded with interim remediation activities by installing the groundwater extraction (GWE) system currently in operation at the station. Routinely submitted quarterly reports documented the effectiveness of the periodic groundwater extraction that had previously been performed by vacuum truck operations (May 2001 – March 2003) as well as the operation of the GWE system. Further, each quarterly report referenced the April 2003 work plan, stating that Shell would implement the scope of work upon concurrence by the ACEH.

Because the contaminant concentrations had steadily and significantly declined with the remedial efforts employed in the previous twelve months, and because no response to the work plan had ever been received, we recommended proceeding with a portion of the scope previously proposed; specifically, the installation of 2 CPT clusters to 75 fbg to assess the vertical extent of MTBE near S-5 and S-9. This recommendation was made in the first quarter 2004 groundwater monitoring report dated April 12, 2004. The work was actually scheduled to occur in July.

In a letter dated May 5, 2004, the ACEH responded, but to the original work plan from April 2003. This letter listed several technical comments, and then requested that the originally proposed 10 CPT pairs be increased to a total 13 CPT pairs, extending beyond the recommended depths to 120 fbg. Further, the ACEH requested investigation of the onsite source areas, preparation of large format (2' x 3') regional maps, additional chemical analyses during ongoing quarterly monitoring events and a few other items.

With the exception of the request for large scale regional maps, which are being provided separately, Cambria addressed all of ACEH's technical comments and requests, submitted a revised site conceptual model, discussed the occurrence of TBA as an intermediate biological degradation product from the biodegradation of MTBE, and proposed a modified scope of work (9 CPT pairs to 80 fbg and 16 onsite borings to 20 fbg for soil sampling, with analyses of TPHg, BTEX, MTBE and TBA).

You approved this scope of work in correspondence dated August 13, 2004, with the following conditions:

- Increase the analytical suite for both soil and groundwater samples to include TPHg, BTEX, MTBE, TAME, ETBE, DIPE, TBA, ethanol, EDB and 1,2-DCA.
- Increase the analytical suite for groundwater samples to include bioparameters (DO, ORP, sulfate, nitrate, and dissolved methane).
- Increase the scope of work for the onsite borings to extend to groundwater for collection of a groundwater sample from each.

### **Shell's Position**

In general, Shell believes that the conditions at the subject site do not pose a significant threat (if any) to down gradient receptors. The remedial efforts performed over the past 2.5 years have been very successful at reducing concentrations of MTBE in groundwater at this site from 100,000 ppb down three orders of magnitude to less than 100 ppb. Since the implementation of the full-time GWE system (July 2003), we have maintained hydraulic control of the contaminant plume. We agree that some vertical assessment should be performed and have proposed such work.

Following a meeting in February of 2003 with your agency, Cambria submitted an April 2003 Site Investigation Work Plan to install numerous CPT borings, to provide additional vertical and lateral delineation of the plume as well as confirm lithologic conditions. Shell was ready to implement that investigation; however, as mentioned above, we did not receive approval from your agency to proceed, and we did not want to implement the scope without ACEH's concurrence. It appeared to us that perhaps your agency was also noticing the significant decline in contaminant concentrations and that the urgency of investigation at this site had been downgraded accordingly. After a year had passed, and concentrations in groundwater had been greatly reduced by the GWE system, Shell and Cambria decided that some vertical investigation would still be appropriate. Thus, we notified your agency of our intent to implement a modified scope of work to assess vertical conditions near S-5 and S-9. The fieldwork was cancelled when we received the May 5, 2004 letter from ACEH that requested even more investigative work than had been proposed a year earlier.

The level of investigative effort that has been, and is being requested by your agency is very costly and, in our opinion, excessive. While we agree that additional vertical assessment is appropriate, we disagree with the level of effort that should be performed. Further, the collection of large amounts of data presumably for the purpose of performing mass flux calculations to estimate the potential threat posed by this site to nearby receptors, is not warranted.

As described in the ChevronTexaco Technical Bulletin ACHSES provided to Shell at our November 4, 2004 meeting, the potential, theoretical uses of max flux calculations are to:

- 1 – prioritize the need for site remediation
- 2 – determine individual contributions from multiple sources to a receptor well
- 3 – properly scale a remediation system
- 4 – evaluate the performance of a remediation system

None of the listed uses apply for the subject case. Interim remediation was initiated in April 2002, and a groundwater extraction system has already been installed and operated for more than a year; therefore items 1 and 3 do not apply. There is no known other source that is co-mingled with the Shell plume, and therefore item 2 does not apply. Regarding item 4, there are more economical ways, and in the subject case much simpler ways, to evaluate the performance of the remediation system than by mass flux calculations. It is not clear how establishing a theoretical mass flux of the contaminant plume at this point in time will change anything about our current approach to this project. Nor does it provide data that is comparable to any screening levels or cleanup goals.

One of the primary purposes of investigation of a petroleum release is to identify any current or potential future receptors that may be impacted by the release, and to remediate the release to the extent necessary to provide protection of those receptors. There are many methods available to perform this work. The State Water Resources Control Board requires that the level of work effort performed at a site be "reasonable and necessary" in order for the work to be considered for reimbursement. For several reasons, Shell does not agree that the approach being requested by ACEH is reasonable or necessary to achieve the goal of protecting receptors from this release.

The two nearest receptors to this site are a municipal well (Hop-6) and the Arroyo Mocho Canal, both of which are drinking water sources.

Hop-6 is located over 1/4-mile down gradient from this site. The well extends to 580 feet below grade (fbg) and its shallowest screened interval is 215 fbg. In November 2002, on behalf of Shell, Cambria installed one deep CPT boring down gradient of the subject site and in a direct line between the Shell site and Hop 6, to assess whether the MTBE plume which has been present at this since at least the year 1996 when analysis for MTBE was initiated. CPT-2 was located near well S-12, which monitors the shallowest water-bearing unit. Groundwater samples at CPT-2 were obtained from 26, 47, 60, 68, and 88 fbg. These five water samples were non-detect for TPHg, benzene and MTBE. Thus, it was established that, at this location and in the direction of Hop-6, the MTBE plume had not dove below the water zone monitored by the monitoring well network. Given the absence of MTBE with depth down gradient of the site, the lateral distance from the site to Hop-6 (> 1/4 mile), and the vertical separation of the shallow impacted zone (<30 fbg) and the first screened interval in Hop-6 (215 fbg), we believe that the MTBE plume originating from the Shell station poses no threat to the

municipal well. During the February 2003 meeting held at Zone 7's office with Shell, Cambria and our ACEH caseworker at that time, Zone 7 personnel agreed.

With respect to the Arroyo Mocho Canal, the shallow groundwater in this area does appear to be discharging to the Arroyo Mocho, based on the groundwater elevation data and water elevation in the canal. Monitoring at S-12 has not indicated MTBE at concentrations above the MCL of 13 ppb. In fact, concentrations of MTBE in S-12 have not exceeded 5 ppb. Shell has proposed collecting periodic samples directly from the Arroyo Mocho to assess whether it is impacted by MTBE, rather than perform expensive tests and theoretical calculations to assess potential impact to the canal. Regardless of what the results of the mass flux calculations would show, Environmental Screening Levels are based on direct measurements either in groundwater, soil, surface water, or soil vapor. Thus, even after performing the excessive field and analytical work requested, and generating a theoretical mass flux result, a sample from the canal would still be needed to measure the actual impact in the canal. This could be achieved for less than \$200 on a quarterly basis. It should be noted that storm water run-off from the surrounding area is discharged directly into the canal via storm drains, and likely contains significant concentrations of petroleum constituents, including MTBE.

Thus, it is Shell's position that a large portion of the work being requested by your agency is not "reasonable or necessary". The following describes the work that we believe is reasonable and necessary and which we intend to perform.

#### **Shell's Plans for the Site**

Shell intends to proceed with the scope of work described in the Cambria document titled *Agency Response, Revised SCM & Modified Work Plan* (June 30, 2004). In your August 13, 2004 response, you conditionally approved the proposed scope of work with several conditions. The following describes how Shell is responding to and addressing these conditions:

The first condition included increasing the proposed analytical suite for both soil and groundwater samples to include TPHg, BTEX, MTBE, TAME, ETBE, DIPE, TBA, ethanol, EDB and 1,2-DCA. As presented in our third quarter groundwater monitoring report submitted in October 2004, this condition is not justified since groundwater monitoring data has shown only very low levels (<5 ppb) of TAME in onsite well T-2 in December 2002 and 1,2-DCA in offsite wells S-7 and S-9 in December 2002. The primary chemicals of concern are BTEX, MTBE, and TBA. The additional analyses increased the proposed analytical costs by over \$10,000 for the onsite soil borings alone. Thus, Cambria requested the expanded analytical suite only on one or two samples from each boring. This achieved the objective of assessing the presence of these constituents in soil, while limiting the financial impact of the request.

Also, analyzing any of the groundwater samples for these constituents is not deemed necessary based on the data from the numerous groundwater monitoring wells onsite and offsite. Shell intends to analyze soil and groundwater samples from the CPT borings for the specific chemicals of concern (TPHg, BTEX, MTBE, and TBA), as proposed in the June 30, 2004 work plan.

The second condition included increasing the analytical suite for groundwater samples to include bioparameters (DO, ORP, sulfate, nitrate, and dissolved methane). These parameters are used as a secondary line of evidence to show whether the aquifer has the potential for biological degradation of the contaminants in the groundwater. But the quarterly groundwater analytical data shows evidence that biological degradation of MTBE is occurring, resulting in the increase in TBA concentrations observed at many sample points. Thus, collection of the bioparameters is not necessary. Since analysis for these parameters would necessitate significantly increased volumes of sample water collected, and thus significantly increase field time necessary to collect the samples, collection of the bioparameters is not reasonable.

The third condition stated that the onsite borings be extended to groundwater for collection of a groundwater sample from each. In order to comply with this condition, at each of the 16 boring locations, a groundwater sample was attempted; however, recharge into the sampling equipment was very slow, and in numerous cases, water was not retrieved. At five locations groundwater was successfully sampled and analyzed as requested.

Shell asserts that the June 30, 2004 work plan, as written, is adequate to meet the County's objectives with the exception of the performance of mass flux calculations, which we believe is not necessary. After 17 years of investigating and monitoring this site, there is no reason to suspect that significant contaminant migration is occurring via unidentified preferential flow paths. Given the consistent groundwater gradient, the lithologic data available thus far, and the trends in contaminant concentrations in the groundwater monitoring wells, there is nothing that suggests that the current interpretation of the plume is incorrect. Thus, Shell believes that the borings proposed by Cambria are adequate to meet the objective of providing lithologic data to identify preferential flow pathways. If the data from these borings shows a drastic change in the current conceptual site model and that additional borings would be beneficial to the interpretation, then additional borings will be proposed. The only other reason to increase the number of borings is because a closer spacing is suggested in order to calculate mass flux, and as stated above, Shell does not believe that these calculations are necessary.

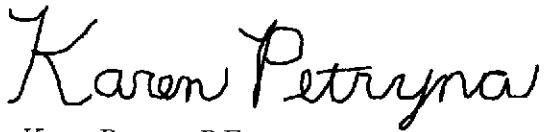
A portion of the June 2004 work plan has already been completed. The access agreements for the offsite properties are in progress. As soon as all access agreements are obtained, we will propose a new deadline for submittal of all onsite and offsite results from our June 30, 2004 work plan.



Mr. Robert Schultz  
December 8, 2004  
Page 8

Shell remains ready to meet with ACEH, our consultant, Zone 7 and the RWQCB, as soon as practical in order to discuss the risks, issues and data interpretation associated with the subject case. Please call me at (559) 645-9306 if you'd like to schedule a meeting or just to discuss this case further.

Best Regards,  
Shell Oil Products US



Karen Petryna, P.E.  
Sr. Environmental Engineer  
HSEQ/Science & Engineering

cc: Ms. Betty Graham, Regional Water Quality Control Board-San Francisco Bay Region  
Mr. Matthew Katen, Zone 7 Water District  
Ms. Karen Lyons, Shell Oil Products US  
Mr. Tim Franceschini, Shell Global Solutions (US) Inc.  
Ms. Ana Friel, Cambria Environmental Technology, Inc.

CAMBRIA

November 22, 2004

Kirk F. Sniff  
7-Eleven, Inc.  
c/o Holli Adams  
Strasburger & Price, LLP  
901 Main Street, Suite 4300  
Dallas, Texas 75202

Re: **3760 Hopyard Road, Pleasanton, California - Access Agreement**  
Shell-branded Service Station  
3790 Hopyard Road  
Pleasanton, California

Dear Ms. Adams:

On behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell), Cambria Environmental Technology, Inc. (Cambria) has enclosed 3 copies of the access agreement for the property located at 3760 Hopyard Road in Pleasanton, California along with requested Certificates of Insurance from both Cambria and Shell naming 7-Eleven as additionally insured.

Please keep the Certificates and sign and forward all copies of the Access Agreement to the property owner for his signature in the enclosed addressed envelope. Enclosed is a cover letter to the property owner with handling instructions (sign all three, keep one for himself, mail one to 7-Eleven, and mail one to Cambria).

Please call Ana Friel at 707-442-2700 or Karen Petryna with Shell at 559-645-9306 with any questions or comments.

Sincerely,  
Cambria Environmental Technology, Inc.

Jason Gerke  
Senior Staff Scientist

*Jason Gerke*  
Alameda County  
Environmental Health  
DEC 15 2004

*Mailed 11/30/04*

Cambria  
Environmental  
Technology, Inc.

5900 Hollis Street  
Suite A  
Emeryville, CA 94608  
Tel (510) 420-0700  
Fax (510) 420-9170

Post-it® Fax Note	7671	Date	12-15-04	# of pages	2
To	R. Schultz	From	K. Petryna		
Co./Dept.	ACHA	Co.	Shell		
Phone #		Phone #	559-645-9306		
Fax #	510-337-9335	Fax #			

— FYI —


C A M B R I A

November 22, 2004

Harold N. Sweet  
C. Antionette Sweet Blankenship  
P.O. Box 4174  
Modesto, CA 95352.

Re: **3760 Hopyard Road, Pleasanton, California - Access Agreement**  
Shell-branded Service Station  
3790 Hopyard Road  
Pleasanton, California

Dear Mr. Sweet:

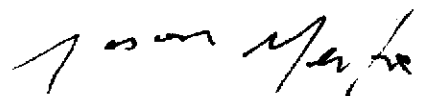


On behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell), Cambria Environmental Technology, Inc. (Cambria) is submitting the attached request for access agreement for the property located at 3760 Hopyard Road in Pleasanton, California. The purpose of this agreement is to obtain access to this property in order to conduct the environmental related work described in the attached document. Currently, the work scope consists of installing soil boring CPT-6 on your property (see attached Figure) to collect subsurface soil and groundwater information. This work is being driven by the Alameda County Health Services Agency and is related to the open environmental case for the Shell-branded Service Station located at 3790 Hopyard Road in Pleasanton. 7-Eleven has already reviewed and signed the agreement.

Please sign all agreement copies, keep one for your records, mail the second to 7-Eleven, and mail the third to Cambria. Stamped and addressed envelopes have been enclosed for your convenience.

Please call Ana Friel at 707-442-2700 or Jason Gerke at 510-420-3320 with any questions or comments.

Sincerely,  
**Cambria Environmental Technology, Inc.**



Jason Gerke  
Senior Staff Scientist

Cambria  
Environmental  
Technology, Inc.

5900 Hollis Street  
Suite A  
Emeryville, CA 94608  
Tel (510) 420-0700  
Fax (510) 420-9170

**Schultz, Robert, Env. Health**

---

**From:** Gerke, Jason [jgerke@cambria-env.com]  
**Sent:** Friday, November 19, 2004 11:20 AM  
**To:** Schultz, Robert, Env. Health  
**Cc:** 'Friel, Ana'; Karen Petryna  
**Subject:** 3790 Hopyard Road, Pleasanton - Access Agreement Status Update 11-19-04

Mr. Schultz,

On behalf of Shell, Cambria is currently pursuing three separate access agreements to conduct off-site CPT borings. Below is the status of each agreement:

1)  
3730 Hopyard, Pleasanton – For the installation of CPT-7 and CPT-10.  
Property owner: Church of God, Pleasanton, CA

Cambria received a signed ROE/Access Agreement from the property owner contact on 11/15/04.

2)  
3760 Hopyard, Pleasanton – For the installation of CPT-6.  
Property owner: Harold N. Sweet, Modesto, CA  
Tenant: 7-Eleven

Shell approved 7-Eleven's revised access agreement on November 9, 2004. 7-Eleven requested certificates of insurance from Shell and Cambria. Required insurance has been secured and the access agreement will be forwarded to Shell for signing on November 19, 2004, then to 7-Eleven for signing. 7-Eleven will then forward to the property owner for the final signature.

3)  
5976 W. Los Positas Blvd, Pleasanton – For the installation of CPT-9  
Property owner: Cranbrook Realty Investment Fund LP

Cambria received edits from property owner for the 10/22/04 access agreement. Edits were approved by Shell and the edited access agreement was mailed to the property owner on November 15, 2004 with the additional Certificate Insurance required.

Please do not hesitate to call Ana Friel (707-442-2700) or Jason Gerke (510-420-3320) with any questions or comments.

Jason Gerke  
Cambria Environmental Technology  
Phone: 510-420-3320  
Fax: 510-420-9170

11/19/2004

**Schultz, Robert, Env. Health**

**From:** Schultz, Robert, Env. Health  
**Sent:** Monday, October 18, 2004 8:55 AM  
**To:** 'Petryna, Karen E SOPUS'  
**Cc:** Ana Friel (E-mail); Drogos, Donna, Env. Health  
**Subject:** RE: RO-363: 3790 Hopyard Rd., Pleasanton

Karen:

That sounds good. Please let me know if I can help with offsite access - we have several form letters that we use to help offsite property owners understand the process.

Thank you,  
Bob

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

**From:** Petryna, Karen E SOPUS [mailto:KEPetryna@ShellOPUS.com]  
**Sent:** Monday, October 18, 2004 7:54 AM  
**To:** Schultz, Robert, Env. Health  
**Cc:** Drogos, Donna, Env. Health; Betty Graham (E-mail); 'dcharter@cwpswrcb.ca.gov'; 'Ana Friel'; Franceschini, Tim OGUS-OGCH/8  
**Subject:** RE: RO-363: 3790 Hopyard Rd., Pleasanton

Bob,

Thanks for your response. Donna called me on Friday and suggested that in lieu of meeting on this site, my supervisor and I meet with you and her and Barney Chan to discuss all Shell cases in ACEH's jurisdiction. Donna suggested the afternoon of October 25, 26 or 27 at your office, and I agreed to find out if my supervisor is available any of those days. Hopefully we can include Betty Graham, as it should be a good opportunity for all of us to establish priorities, etc.

Regarding 3790 Hopyard, I hope we can meet to discuss the details of this site soon. In the meantime, I will confer with my consultant to determine a reasonable date to report on recent onsite as well as not yet scheduled offsite work and request your approval. I will also continue to keep you informed on our progress for offsite access.

I don't know that my proposal to sample the canal quarterly would have any use in evaluating the total contaminant mass entering the canal, if any. My thought was that it would be useful to know if there was any measurable contaminant mass entering the canal before proceeding with calculating mass flux estimates. At this point, based on the non-detect results of offsite investigation to date in the vicinity of the canal, I do not have reason to believe that any contaminant mass is entering the canal. However, I will confer with my consultants and determine what is the best way to confirm that-- which I will then propose for your consideration.

Karen

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

**From:** Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]  
**Sent:** Friday, October 15, 2004 10:44 AM  
**To:** Petryna, Karen E SOPUS  
**Cc:** Drogos, Donna, Env. Health; Betty Graham (E-mail); 'dcharter@cwpswrcb.ca.gov'  
**Subject:** RE: RO-363: 3790 Hopyard Rd., Pleasanton

Karen:

10/18/2004

In response to your extension request, ACEH has not yet but is willing to extend the deadline for submittal of the interim soil and water investigation report. Your report is currently past due. As explained in my previous email, the interim report was initially requested in a letter dated February 27, 2003. You have requested indefinite extension of the deadline for submittal of the interim soil and groundwater report, and proposed submittal of a partial report by December 7, 2004. We would prefer that you present a single report that includes both onsite source area investigation and downgradient groundwater investigation. Accordingly, please propose a reasonable estimated date for submittal of your interim report. I understand that due to access agreement issues your estimate may be subject to change. If access agreement issues appear likely to further delay the investigation beyond your estimated date, you may request further extension at that time.

Regarding your proposal for quarterly sampling of the canal, please explain how your approach would be useful in evaluating the total contaminant mass entering the canal. If you believe that contaminant concentrations in canal water may increase and exceed the appropriate screening levels as a result of groundwater infiltration from your plume, then quarterly canal sampling needs to be implemented immediately. Please explain your concern. As an alternative to the mass flux approach for receptor protection, others have performed depth-discrete groundwater sampling in stream bed sediments and soils underlying the potentially impacted waterway. Please revise your proposal to clearly identify the potential impacts (including pathways, receptors, and sensitivity of receptors) and explain how your approach will evaluate the potential impact.

With respect to your meeting request, I would be glad to meet with you on 10/29/04.

Sincerely,  
Bob

\*\*\*\*\*

Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6719 (direct)  
510-337-9335 (facsimile)

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

**From:** Petryna, Karen E SOPUS [mailto:KEPetryna@ShellOPUS.com]  
**Sent:** Thursday, October 14, 2004 2:45 PM  
**To:** Schultz, Robert, Env. Health  
**Cc:** 'afriel@Cambria-env.com'; 'mkatzen@zone7water.com'; 'cwiney@zone7water.com'; Drogos, Donna, Env. Health; 'bg@rb2.swrcb.ca.gov'  
**Subject:** RE: RO-363: 3790 Hopyard Rd., Pleasanton

Bob,

Thanks for consideration of our request and the opportunity to provide some additional information.

Shell recently completed all onsite field work. We will be able to report results for that by December 7 (approximately 45 days after field work).

We are still in the process of gaining access for some of the offsite work. Although we have submitted an agreement to Southland Corporation to access their 7-Eleven property, if they're anything like Shell, they will have quite a few hoops for us to jump through before they sign an agreement.

The access agreement for the other offsite property was sent to the owner identified by the Assessor's office. But it turns out that was wrong. I expect to send out a new agreement yet this week to the correct owner. Although I don't anticipate this second agreement will take as long as the first, we will keep you updated on the progress of both.

As soon as we have access to both offsite properties we can schedule the field work. We'll let you know as soon as we have a date. We will be able to report results for the offsite field work 45 days after it is completed.

Regarding the request to calculate mass flux of contaminants leaving the Shell station property that may be entering the canal, we propose a more direct approach-- to simply begin quarterly sampling of the canal.

Since you are relatively new to the project, Shell would like to meet with you, Zone 7 and the Regional Board to discuss it. We propose Friday, the 29th, at Zone 7's office, if everybody is willing and available, around 10 a.m.

Karen

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

From: Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]  
Sent: Wednesday, October 06, 2004 10:12 AM  
To: Petryna, Karen E SOPUS  
Cc: 'afriel@cambria-env.com'; 'mkatzen@zone7water.com';  
'cwiney@zone7water.com'; Drogos, Donna, Env. Health;  
'bg@rb2.swrcb.ca.gov'  
Subject: RO-363: 3790 Hopyard Rd., Pleasanton

Karen:

ACEH's February 27, 2003 directive to Shell required:

1. interim soil and water investigation report  
-60 days after workplan approval
2. SWI Completion Report, including installation of new monitoring wells  
-90 days after workplan approval

After revision of the original workplan, workplan approval was on August 13, 2004, and ACEH requested an interim investigation report by October 13, 2004. Your September 30, 2004 extension request proposes submittal of a portion of the interim investigation by December 7, 2004. No rationale supporting the delay was provided. In order to consider your request, ACEH requires:

- A. Proposed dates for completion of all work outlined in ACEH's February 27, 2003; May, 5, 2004; and August 13, 2004 directives.
- B. Rationale supporting your request for extension.

If rationale for delay includes difficulty in securing offsite access agreements, we require written documentation such as copies letters or emails from property owners.

Sincerely,  
Bob Schultz

\*\*\*\*\*

Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6719 (direct)  
510-337-9335 (facsimile)



**Schultz, Robert, Env. Health**

**From:** Petryna, Karen E SOPUS [KEPetryna@ShellOPUS.com]  
**Sent:** Thursday, October 14, 2004 2:45 PM  
**To:** Schultz, Robert, Env. Health  
**Cc:** 'afriel@cambria-env.com'; 'mkatn@zone7wter.com'; 'cwiney@zone7water.com'; Drogos, Donna, Env. Health; 'bg@rb2.swrcb.ca.gov'  
**Subject:** RE: RO-363: 3790 Hopyard Rd., Pleasanton

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Since you are relatively new to the project, Shell would like to meet with you, Zone 7 and the Regional Board to discuss it. We propose Friday, the 29th, at Zone 7's office, if everybody is willing and available, around 10 a.m.

Karen

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

**From:** Schultz, Robert, Env. Health [mailto:[robert.schultz@acgov.org](mailto:robert.schultz@acgov.org)]  
**Sent:** Wednesday, October 06, 2004 10:12 AM  
**To:** Petryna, Karen E SOPUS  
**Cc:** 'afriel@cambria-env.com'; 'mkatn@zone7wter.com'; 'cwiney@zone7water.com'; Drogos, Donna, Env. Health; 'bg@rb2.swrcb.ca.gov'  
**Subject:** RO-363: 3790 Hopyard Rd., Pleasanton

Karen:

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1. interim soil and water investigation report  
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10/14/2004

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A. Proposed dates for completion of all work outlined in ACEH's February 27, 2003; May, 5, 2004; and August 13, 2004 directives.

B. Rationale supporting your request for extension.

If rationale for delay includes difficulty in securing offsite access agreements, we require written documentation such as copies letters or emails from property owners.

Sincerely,  
Bob Schultz

\*\*\*\*\*

Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6719 (direct)  
510-337-9335 (facsimile)

**Schultz, Robert, Env. Health**

**To:** Petryna, Karen E SOPUS  
**Cc:** Drogos, Donna, Env. Health; Betty Graham (E-mail); dcharter@cwpswrcb.ca.gov  
**Subject:** RE: RO-363: 3790 Hopyard Rd., Pleasanton

Karen:

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Sincerely,  
Bob

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Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6719 (direct)  
510-337-9335 (facsimile)

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

**From:** Petryna, Karen E SOPUS [mailto:KEPetryna@ShellIOPUS.com]  
**Sent:** Thursday, October 14, 2004 2:45 PM  
**To:** Schultz, Robert, Env. Health  
**Cc:** 'afriel@cambria-env.com'; 'mkatens@zone7water.com'; 'cwinney@zone7water.com'; Drogos, Donna, Env. Health; 'bg@rb2.swrcb.ca.gov'  
**Subject:** RE: RO-363: 3790 Hopyard Rd., Pleasanton

Bob,

10/15/2004

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Karen

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

From: Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]

Sent: Wednesday, October 06, 2004 10:12 AM

To: Petryna, Karen E SOPUS

Cc: 'afriel@Cambria-env.com'; 'mkatzen@zone7water.com';

'cwinney@zone7water.com'; Drogos, Donna, Env. Health;

'bg@rb2.swrcb.ca.gov'

Subject: RO-363: 3790 Hopyard Rd., Pleasanton

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-60 days after workplan approval
2. SWI Completion Report, including installation of new monitoring wells  
-90 days after workplan approval

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A. Proposed dates for completion of all work outlined in ACEH's February 27, 2003; May, 5, 2004; and August 13, 2004 directives.

B. Rationale supporting your request for extension.

If rationale for delay includes difficulty in securing offsite access agreements, we require written documentation such as copies letters or

10/15/2004

emails from property owners.

Sincerely,  
Bob Schultz

\*\*\*\*\*

Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6719 (direct)  
510-337-9335 (facsimile)

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

November 13, 2004

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

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. RO0000363, Shell Service Station #13-5784, 3790 Hopyard Rd., Pleasanton, California –Technical Report Late Letter

Dear Ms. Petryna:

Alameda County Environmental Health (ACEH) requested an interim soil and water investigation report by October 13, 2004. The interim report was initially requested in a letter dated February 27, 2003. Your September 30, 2004 extension request and subsequent email correspondence request indefinite extension of the deadline for submittal of this report, and propose submittal of a partial report by December 7, 2004. No rationale supporting the delay has been provided. We reiterate our request for completion of all work outlined in ACEH's February 27, 2003; May, 5, 2004; and August 13, 2004 directives.

Your interim soil and water report is currently 30 days late, and your fuel leak site is not in compliance with ACEH directives. We request that you submit your report as soon as possible. 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.

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 note that further delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive cost reimbursement from the State's Underground Storage Tank Cleanup Fund.

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

Sincerely,

Robert W. Schultz, R.G.  
Hazardous Materials Specialist

cc: Matt Derby, Cambria Environmental Technology, Inc., 5900 Hollis St., Ste. A, Emeryville,  
CA 94608  
Matt Katen, Zone 7 Water District, QIC 80201  
Betty Graham, RWQCB-SFBR, 1515 Clay St., Ste. 1400, Oakland, CA 94612  
Dave Charter, SWRCB-USTCF, P.O. Box 944212, Sacramento, CA 94244  
Donna Drogos, ACEH  
Robert W. Schultz, ACEH

RO-363

**Schultz, Robert, Env. Health**

---

**From:** Schultz, Robert, Env. Health  
**Sent:** Friday, November 05, 2004 11:17 AM  
**To:** 'afriel@cambria-env.com'  
**Cc:** Karen Petryna  
**Subject:** RE: Property owner information for 3730 Hopyard Road, Pleasanton

Thank you for the update. Please cc ACEH on Shell's responses to the owners of 3760 Hopyard and 5976 Las Positas.

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

**From:** Friel, Ana [mailto:afriel@cambria-env.com]  
**Sent:** Friday, November 05, 2004 11:15 AM  
**To:** Schultz, Robert, Env. Health  
**Cc:** Karen Petryna  
**Subject:** Property owner information for 3730 Hopyard Road, Pleasanton

November 5, 2004

RE: Shell station at 3790 Hopyard, Pleasanton: Offsite Access Issues

Bob,

Karen Petryna asked me to forward to you the contact information for the owner of property at 3730 Hopyard Rd, Pleasanton. The initial owner information that we received from the Assessor's office was not correct. During our field work (Oct 4 - 8), we were able to visit the property and obtain the correct owner information. The request for access was forwarded to them the week of October 11.

Owner Info for 3730 Hopyard Road:

The Church in Pleasanton  
3730 Hopyard Road  
Pleasanton, CA 94588  
Care of: T.C. Sun

Mr. Sun's contact phone number is 925-422-1277.

FYI, we received comments back from two other offsite property owners (3760 Hopyard Road and 5976 Las Positas Blvd) regarding the access agreements. The requested revisions and demands of these owners are being forwarded to Shell's legal department for review.

Regards,

Ana Friel  
Senior Project Geologist  
Cambria Environmental Technology, Inc.  
(707) 442-2700

11/5/2004



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



November 5, 2004

The Church in Pleasanton  
c/o T.C. Sun  
3730 Hopyard Road  
Pleasanton, CA 94588

ENVIRONMENTAL HEALTH SERVICES

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

Subject: Property Access by the Parties Responsible for the Investigation and Cleanup of Petroleum Hydrocarbon and Fuel Oxygenate Pollution at Fuel Leak Case No. RO0000363, Shell Service Station #13-5784, 3790 Hopyard Rd., Pleasanton, California

Dear Property Owner:

Alameda County Environmental Health (ACEH) is overseeing the investigation and cleanup of gasoline, including the gasoline compounds Methyl tert-Butyl Ether (MTBE) and benzene, released from fuel underground storage tanks at the subject site. We are uncertain as to how far the contamination from those tanks has moved.

ACEH is requiring Shell Oil Products US to investigate and clean up contaminated soil and groundwater at the site to prevent the gasoline, MTBE, and benzene contamination from spreading to other properties or to drinking water sources, and to reduce the potential threat to human health and the environment. To properly determine the extent of that contamination in groundwater, Shell must perform additional off-site investigation. Therefore, we need your help in allowing access to your property by Shell to properly define the extent of contamination.

If you have any questions, please contact Karen Petryna of Shell Oil Products US at (559) 645-9306. Thank you for your cooperation.

Sincerely,

Robert W. Schultz, R.G.  
Hazardous Materials Specialist

cc: Karen Petryna, Sr. Environmental Engineer, Shell Oil Products US, 20945 S. Wilmington Ave., Carson, CA 90810  
D. Drogos, R. Schultz

**Schultz, Robert, Env. Health**

---

**From:** Schultz, Robert, Env. Health  
**Sent:** Wednesday, October 06, 2004 10:12 AM  
**To:** Karen Petryna (E-mail)  
**Cc:** 'afriel@cambria-env.com'; 'mkaten@zone7water.com'; 'cwiney@zone7water.com'; Drogos, Donna, Env. Health; 'bg@rb2.swrcb.ca.gov'  
**Subject:** RO-363: 3790 Hopyard Rd., Pleasanton

Karen:

ACEH's February 27, 2003 directive to Shell required:

1. interim soil and water investigation report  
-60 days after workplan approval
2. SWI Completion Report, including installation of new monitoring wells  
-90 days after workplan approval

After revision of the original workplan, workplan approval was on August 13, 2004, and ACEH requested an interim investigation report by October 13, 2004. Your September 30, 2004 extension request proposes submittal of a portion of the interim investigation by December 7, 2004. No rationale supporting the delay was provided. In order to consider your request, ACEH requires:

- A. Proposed dates for completion of all work outlined in ACEH's February 27, 2003; May, 5, 2004; and August 13, 2004 directives.
- B. Rationale supporting your request for extension.

If rationale for delay includes difficulty in securing offsite access agreements, we require written documentation such as copies letters or emails from property owners.

Sincerely,  
Bob Schultz

\*\*\*\*\*  
Robert W. Schultz, R.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6719 (direct)  
510-337-9335 (facsimile)

September 30, 2004

Robert W. Schultz  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502-6577

Re: **Status Update and Report Extension Request**  
Shell-branded Service Station  
3790 Hopyard Road  
Pleasanton, California  
SAP Code 135784  
Incident #98995842  
ACHCSA # RO0000363

Alameda County  
UL, 05 2004  
Environmental Health



Dear Mr. Schultz:

Cambria Environmental Technology, Inc. (Cambria) prepared this correspondence on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell) to provide an update of activities to the Alameda County Health Care Services Agency (ACHCSA) and to request an extension for the document submittal requested in your letter dated August 13, 2004.

### STATUS UPDATE

Permits have been received and pre-field activities are completed for the on-site borings (SB-1 through SB-16). The field work is scheduled for October 4 through 8, 2004.

Cambria is in the process of obtaining right-of-entry agreements for offsite private properties where CPT borings are proposed. Also, the encroachment permitting has been initiated for CPT borings positioned on City of Pleasanton property. Although it is subject to change (depending on receipt of access agreements and encroachment permits), the CPT work is currently scheduled to occur the week of November 15, 2004.

### REQUEST FOR REPORT EXTENSION

In the letter referenced above, the ACHCSA requested submittal of a technical report by October 13, 2004. Since the onsite borings will not be installed until the week of October 4<sup>th</sup> and the CPT work will not occur until mid-November at the earliest, an extension for the report submittal is hereby requested. Because the completion of the CPT work is contingent upon obtaining access and permit conditions, Cambria recommends submitting an interim report documenting the onsite soil boring investigation activities and results to your office by **December 7, 2004**, which is 40 business days following completion of the field activities.

**Cambria  
Environmental  
Technology, Inc.**

270 Perkins Street  
P.O. Box 259  
Sonoma, CA 95476  
Tel (707) 935-4850  
Fax (707) 935-6649

C A M B R I A

**CLOSING**

If you have any questions regarding this correspondence, please call Ana Friel at (707) 442-2700.

Sincerely,  
**Cambria Environmental Technology, Inc.**



*Ana Friel*  
*for*

Ana Friel, RG  
Senior Project Geologist



cc: Karen Petryna, Shell Oil Products US  
Betty Graham, RWQCB  
Danielle Stefani, Livermore-Pleasanton Fire Department  
Matthew W. Katen, Zone 7 Water Agency  
Tri-Valley Management

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY

DAVID J. KEARS, Agency Director



August 13, 2004

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

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. RO0000363, Shell Service Station #13-5784, 3790 Hopyard Rd., Pleasanton, California

Dear Ms. Petryna:

Alameda County Environmental Health (ACEH) has reviewed your June 30, 2004 *Agency Response, Revised SCM & Modified Work Plan* prepared by Cambria Environmental Technology, Inc. for the above-referenced site. We concur with your modified workplan provided the following conditions are met:

1. All samples be analyzed for TPHg, BTEX, and fuel oxygenates/additives (MTBE, TAME, ETBE, DIPE, TBA, ethanol, EDB and 1,2-DCA);
2. Groundwater samples be analyzed for bioparameters, including DO, ORP, sulfate, nitrate, and dissolved methane; and
3. All onsite borings be advanced to at least first-encountered groundwater (approximately 20 to 25 ft bgs) and a depth discrete groundwater sample analyzed from each onsite boring.

Please implement the proposed investigation and submit the requested report following the schedule below. In addition, we request that you address the following technical comments in your report.

#### TECHNICAL COMMENTS

##### 1. Mass Flux Approach

Your April 30, 2003 *Subsurface Investigation Work Plan* prepared by Cambria included a discussion of mass balance approach. Cambria's arguments showed lack of understanding of the mass flux approach requested by ACEH in our February 27, 2003 letter. Please see the attached June 2002 ChevronTexaco technical bulletin "Mass Flux Estimates to Assist Decision-Making," for a summary of mass flux estimation using sampling transects.

ACEH's May 5, 2004 letter requested six borings within the southern-most transect with no more than 40 to 45 ft between borings. The objectives of the transects are to:

- Provide sufficient lithologic data perpendicular to the plume axis so that preferential flow paths may be identified, and
- Characterize contaminant concentrations with sufficient detail to accurately bracket contaminant mass flux from the site.

Cambria's planned CPT boring locations are spaced 85 to 95 ft apart. This spacing interval will not provide sufficient confidence that the investigation has met the objectives specified above.

## 2. Impact to Arroyo Mocho Canal

The Groundwater Contour Map in Cambria's June 28, 2004 monitoring report shows the water surface elevation within the Arroyo Mocho Canal as 302.79 ft above msl. The groundwater elevations in nearby wells S-12, S-9 and S-11 are respectively 305.91, 307.83 and 309.00 ft above msl. Cambria's groundwater contour map shows the groundwater gradient to be toward the canal. Based on this data, Shell's release may be migrating from the site and into the Arroyo Mocho Canal. The hydraulic connectivity between the Arroyo Mocho Canal and groundwater in the site vicinity needs to be understood. MTBE-contaminated groundwater was first detected in well S-12 on May 9, 2003. The laboratory detection limit was reduced from 5.0 ug/L to 1.0 ug/L for that monitoring event, so earlier impacts to the Arroyo Mocho Canal may have occurred undetected. Quantification of mass flux of the contaminants of concern from the site appears needed to assess the potential for impact to drinking water resources via the canal.

## 3. Downgradient Impact

The April 7, 2004 detection of 380 ug/L MTBE appears to be the highest ever detected in monitoring well S-7 (the September 17, 2001 result is suspect). MTBE concentrations in well S-9 are also near the historical maximum concentration for this well. Additional downgradient investigation and evaluation of the potential impact to water supply wells is necessary. Quantification of mass flux of the contaminants of concern from the site appears needed to perform this evaluation.

## 4. Groundwater Remediation

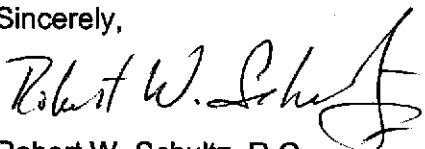
Your June 28, 2004 *Groundwater Monitoring Report – Second Quarter 2004* stated that groundwater extraction (GWE) will be performed from monitoring wells S-7 and S-9 and that the results will be reported in the third quarter monitoring report. ACEH requests that the results of the batch GWE from the existing downgradient long-screened wells also be included in the report requested below. We request that your report consider the lithologic and groundwater concentration data obtained from borings CPT-8 and CPT-9 in evaluating the efficacy of continued downgradient GWE.

## REPORT REQUEST

Please submit your *Interim Soil and Groundwater Investigation Report*, including a workplan for the installation of new monitoring wells, which addresses the comments above, by **October 13, 2004**. Pursuant to Section 25297 of the California Health and Safety Code, ACEH requests this report utilizing the Regional Water Quality Control Board's authority defined under Section 13267 of the California Water Code.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,



Robert W. Schultz, R.G.  
Hazardous Materials Specialist

Attachment: ChevronTexaco technical bulletin, "Mass Flux Estimates to Assist Decision-Making," June 2002.

Cc: Ana Friel, Cambria Environmental Technology, Inc., P.O. Box 259, Sonoma, CA 95476  
Matt Katen, Zone 7 Water District, QIC 80201 (w/o attachment)  
Donna Drogos, ACEH (w/o attachment)  
Robert W. Schultz, ACEH (w/o attachment)

**Seery, Scott, Env. Health**

---

**From:** Seery, Scott, Env. Health  
**Sent:** Thursday, May 20, 2004 3:39 PM  
**To:** 'Friel, Ana'  
**Cc:** kepetryna@shellopus.com  
**Subject:** RE: Request for Extension/3790 Hopyard Road, Pleasanton, CA

Hello Ana

I can certainly understand the time/staff constraints you are likely experiencing, the amount of additional preparatory work we have requested for the SWI work plan addendum, and appreciate you contacting me about an extension to the due date for submittal of this addendum.

Your request for an extension is certainly acceptable, and so please submit the addendum by July 1, 2004, as you've requested (well, actually you said *July 1, 2005*, but I'm certain you meant 2004!).

I also now understand that you had already sampled during Q2, and so please begin the sampling changes beginning Q3. However, please do implement, beginning in the Q2 report, the request for tabulation/presentation of all historic sampling data and specific isoconcentration maps, as indicated in the May 5 letter.

If you have any other questions that may arise, feel free to call me at 510-567-6783, or e-mail here.

Scott

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

**From:** Friel, Ana [mailto:afriel@cambria-env.com]  
**Sent:** Thursday, May 20, 2004 3:23 PM  
**To:** sseery@co.alameda.ca.us  
**Cc:** kepetryna@shellopus.com  
**Subject:** Request for Extension/3790 Hopyard Road, Pleasanton, CA  
**Importance:** High

Scott -

Cambria received a copy of your May 5, 2004 letter to Shell requesting a revised SCM and SWI Work Plan for the above referenced site. We are currently in the process of responding to your request. However, due to Cambria's/Shell's internal review process for draft documents and currently scheduled vacation of key reviewers, we respectfully **request an extension** for submittal of the technical report from June 5, 2004 to **July 1, 2005**.

Also, since the second quarter groundwater sample event occurred in early April, the additional chemical analyses that you requested in your May 5, 2004 letter will not be included with the second quarter monitoring report. We will address your request and include the additional analyses in the third quarter sample event.

Please note that Matt Derby is no longer managing this project for Cambria. I am now the Cambria Project Manager for this Shell project. Please direct future correspondence to my attention at the address shown below.

If you have any questions or concerns regarding this request for an extension, or if you need us to forward a hard-copy written request, please contact me at your earliest convenience at



(707) 442-2700.

Regards,

Ana Friel, RG  
Senior Project Geologist

Cambria Environmental Technology, Inc.  
270 Perkins Street  
Sonoma, California 95476

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

RO0000363

May 5, 2004

Ms. Karen Petryna  
Shell Oil Products Company US  
P.O. Box 7869  
Burbank, CA 91510-7869

**RE: SWI and SCM for Shell Station, 3790 Hopyard Road, Pleasanton, CA**

Dear Ms. Petryna:

This letter follows a review of the fuel leak case file for the above referenced site, up to and including the April 12, 2004 Cambria Environmental Technology, Inc. (Cambria) first quarter 2004 groundwater monitoring report, and, in particular, the April 30, 2003 Cambria subsurface investigation work plan (i.e., Soil and Water Investigation [SWI] work plan) with incorporated Site Conceptual Model (SCM).

This letter presents a request to revise the SCM and SWI work plan scope, submit additional technical information, and augment routine quarterly sampling and monitoring tasks and subsequent reports to reflect additional data collection and reporting requirements. These requests are in accordance with provisions of the California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be considered as part of the required SWI and SCM. **We request that you prepare and submit an SWI work plan addendum by June 5, 2004, and augment future sampling and monitoring activities and reports, that address the following technical issues.**

#### TECHNICAL COMMENTS

1. Site Conceptual Model

Oxygenate occurrence, genesis and distribution

- Concentrations of MtBE in sampled wells appear, overall, on a trend of decline since Fall 2003. However, detectable concentrations of MtBE began appearing in off-site wells S-11 and S-12 in May 2003, approximately 8 months after the installation of these wells. Well S-12 is located on the service road on the north bank of Arroyo Mocho, approximately 400' from the site's current tank complex.

TBA was also identified in at least one monitoring well (S-2) as far back as September 2001, the first time TBA was sought in a select few wells in the network. TBA was also discovered at markedly high concentrations in off-site well S-6. TBA was first sought in S-6 during September 2001 and was found to be below a detection limit of 50 ug/l at that time. The next time TBA was sought was 15 months later, during December 2002, at which time the TBA concentration in S-6 jumped to 10,000 ug/l. In May 2003 the TBA concentration rose to 12,000 ug/l; in July 2003, 8400 ug/l; in October 2003, 10,000 ug/l; and in January 2004, 7600 ug/l. More recently, TBA was detected in on-site well SR-2 during January 2004 at a concentration of 17,000 ug/l.

The SCM does not discuss the presence or significance of TBA discovered in both on- and off-site wells in terms of either its genesis or the hydrogeology and preferential pathways, whether geogenic or otherwise, that may have contributed to its distribution in directions that, in some cases, appear inconsistent with published groundwater flow. In particular, off-site well S-6 is located outside the "Downgradient Flow Zone" diagram presented in Figure 2 of the referenced April 30, 2003 Cambria SWI work plan, yet the concentrations of TBA identified in this off-site well are comparable to the highest historic concentrations detected in other wells located on site, and have appeared at those concentrations in a very short period of time.

The SCM must be revised to reflect exploration of this issue.

#### Arroyo Mocho

- Text appearing on page 6 of the cited April 30, 2003 Cambria work plan, under an SCM heading, indicates the Arroyo Mocho is considered a "losing" stream based calculated ground water elevations derived from measurements of project monitoring wells and canal base elevations provided by Zone 7 Water Agency. However, the SCM presented as Item 4.6 of Appendix B of that document indicates the arroyo is a "gaining" canal. In both instances, these interpretations, whether considered a gaining or losing stream, are used as a means to argue that the arroyo will not be impacted by releases from the site.

This apparent conflict in interpretation must be resolved and the SCM revised accordingly.

## 2. Contaminant Plume Definition – Soil and Groundwater Investigation

The purpose of contaminant plume definition is to determine the *three-dimensional* extent of contamination in soil and groundwater, including a determination of 3-D extent of impacts in the source area(s) and released contaminant mass, and a demarcation of potential geogenic and anthropomorphic flow pathways. As you know, both MtBE and TBA are present in wells located both on- and off-site. As recently as May 2003, TBA was reported at concentrations of 18,000 ug/l in on-site well S-4 and 12,000 ug/l in off-site well S-6. MtBE has been detected since May 2003 in well S-12, installed during September 2002. The most recent data from the January 2004 sampling event indicate TBA concentrations at 9800 ug/l in S-4 and 7600 ug/l in S-6. Note that nearly all wells completed in the shallow water-bearing formation have screen intervals of between 20 and 30-feet in length. Such long

screens do not lend confidence in the sampling data; hence, ambient TBA and MtBE concentrations may actually be higher than what is being reported.

The referenced Cambria SWI work plan proposes a phased approach to investigate soil and groundwater conditions. In general, the work proposed would involve the advancement of 10 paired CPT borings to 1) Determine lithologies, and 2) Facilitate targeted soil and groundwater sampling from specific depths and lithologies identified during the completion of the initial CPT borings. This work would then be followed by the installation of well clusters with screen depths and intervals based on preliminary CPT work.

**We request that the proposed SWI scope and approach be modified, and a work plan addendum submitted, as follows.**

CPT Transects:

- The Cambria SWI work plan proposes the completion of 10 paired CPT borings, seven of which are proposed along two distinct transects trending roughly east-west. Four (4) CPT pairs are currently proposed along the transect generally defined by wells S-8, S-7, and S-11. Three (3) additional CPT pairs are proposed on the station property. One CPT pair is proposed near the current tank complex, and two other CPT pairs are proposed adjacent or relevant to well S-9. Cambria proposes to advance all CPT pairs to 40' below grade (bg), except for the two CPT pairs located adjacent to well S-9, each proposed for completion depths of 75' bg.

We request that six (6) additional CPT pairs be completed along the southern-most transect, for a total of ten (10) CPT pairs, and that each pair be on centers of ~ 40 - 45'. Hence, five (5) CPT pairs would be completed on the west side, four (4) on the east side, and one near the center median of Hopyard Road. Three (3) of these additional CPT pairs would be completed beyond the CPT pair proposed adjacent to well S-11, continuing along the same trend into the parking lot of the office complex located on the east side of Hopyard Road. We also request that one (1) additional CPT point be completed further west of the CPT point proposed adjacent to well S-8 along the same trend as others in that transect.

- All CPT pairs are to be advanced to a minimum of 120' bg.
- The proposed northern-most transect may be omitted from the scope of work at this time.

Source investigation

- The Cambria work plan currently proposes a single CPT pair near the southern end of the current tank complex. No plans to assess the former tank complex, current and former product/vapor/vent piping, nor current and former dispenser areas and associated drive slabs have been proposed.

We request that all potential source areas, as noted above, be investigated. We request that you submit a proposal in your SWI addendum to accommodate this request. We suggest, as a cost saving measure, that you consider use of direct-push/direct-read tools (e.g., laser induced

fluorescence, membrane interface probe, etc.) to measure relative hydrocarbon concentrations with depth in both soil and groundwater, in addition to determining lithologies, followed by judicious sampling of soil and ground water in targeted areas. You may also consider, however, use of CPT pairs for the source area investigation, as are proposed elsewhere for this project.

#### Regional maps

- Large format (e.g., 2 x 3') regional maps of the site and surrounding area are to be provided at a scale suitable for clearly showing salient features of the site and adjoining properties, such as buildings and other structures, streams, streets, bridges, sidewalks, municipal well fields, and all wells (production, test, irrigation, and monitoring wells, whether active, destroyed, or abandoned). A base map with the surface features noted, above, along with layer maps illustrating regional groundwater gradients and capture zones associated with production wells of the Hopyard well field shall be presented, at a minimum.

Please submit these large format maps with the SWI work plan addendum. Zone 7 Water Agency may already have 1:1200 scale base maps of the area that you might use to begin the development of your maps.

### 3. Routine sampling reports

#### Oxygenate reporting

- All routine sampling events shall include analysis and reporting of the full suite of potential fuel oxygenates. Review of recent sampling data reveals that analysis for several oxygenates, including EtOH, has not been performed for nearly 3 years in some cases (i.e., EtOH). Only MtBE and TBA have been sought on a regular basis.

Testing shall resume and the results reported for all Oxygenates (MtBE, DIPE, ETBE, TAME, TBA, EtOH) beginning with the 2<sup>nd</sup> quarter 2004 sampling event.

#### Tabulation of reported data

- Tabulated analytical data presented in routine quarterly reports does not present all sampling data collected historically. Tabulated sampling data only goes as far back as March 1991.

Tabulation of all historic (and current) sampling data shall be incorporated into routine quarterly reports beginning with the 2<sup>nd</sup> quarter 2004 report.

#### Isoconcentration maps

- Please present isoconcentration maps in all routine quarterly monitoring reports for the following target compounds: Benzene, TPH-g, and all detected Oxygenates.

4. Additional issues

Some of the historic soil analytical data presented in Table 1 of the cited April 30, 2003 Cambria document are in error. For example, the tabulated collection dates for soil samples collected during the advancement of well borings S-11 and S-12 are erroneously indicated as occurring during August 1998. We understand that wells S-11 and S-12 were actually drilled during September 2002.

Please review and verify these data and submit a revised table with submission of the requested SWI work plan addendum.

#### **TECHINCAL REPORT REQUEST**

Please submit technical reports according to, or otherwise comply with, the following schedule:

**June 5, 2004** – Work plan addendum for Soil and Water Investigation

**July 15, 2004** – Quarterly Report for the Second Quarter 2004

**October 15, 2004** – Quarterly Report for the Third Quarter 2004

**January 15, 2005** – Quarterly Report for the Fourth Quarter 2004

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately-registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

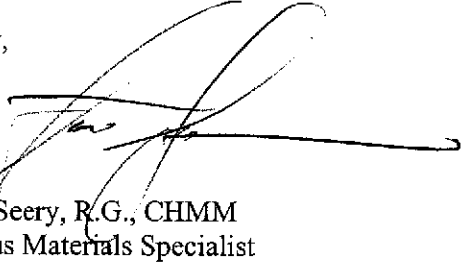
#### **AGENCY OVERSIGHT**

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

Ms. Karen Petryna  
Re: Shell Station, 3790 Hopyard Road, Pleasanton  
May 5, 2004  
Page 6 of 6

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, R.G., CHMM  
Hazardous Materials Specialist

c: Betty Graham, RWQCB  
Dave Charter, SWRCB UST Fund  
Matt Katen, Zone 7 Water Agency  
Danielle Stefani, Livermore-Pleasanton Fire Department  
Matthew W. Derby, Cambria Env. Technology, Inc., 5900 Hollis St. Emeryville, CA 94608  
D.Drogos

**Seery, Scott, Env. Health**

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**From:** Seery, Scott, Env. Health  
**Sent:** Tuesday, April 15, 2003 10:12 AM  
**To:** 'Petryna, Karen E SOPUS'  
**Cc:** 'Jacquelyn Jones'  
**Subject:** Shell Site - 3790 Hopyard Road, Pleasanton

Karen

I received a call from Jacqueline last week requesting an extension to the due date for the SWI workplan and SCM. Cambria's April '03 "Agency Response and Extension Request" also requests an extension until May 30, 2003 for submittal of these items.

I discussed this issue with my supervisor, Donna Drogos, this morning. We have agreed to provide an extension until May 1, 2003.

Scott

4/15/2003



**Seery, Scott, Env. Health**

---

**From:** Seery, Scott, Env. Health  
**Sent:** Tuesday, April 15, 2003 10:29 AM  
**To:** 'Jacquelyn Jones'  
**Subject:** Shell Site - 3790 Hopyard Road, Pleasanton

Jacquelyn

I understand that Cambria will be submitting the 1st quarter '03 QMR due April 15 in mid-May, and that future sampling schedules will be modified such that QMRs will be submitted according to the schedule outlined in the 02/27/03 ACDEH correspondence.

I also wanted to clarify my earlier e-mail regarding submittal of the SWI workplan and SCM: your call to me last week was NOT about an extension for the due date for submittal of these documents. You called asking for an extension for submittal of the 1st quarter '03 QMR. I apologize for confusing these two separate issues.

Please forward this message on to Karen Petryna. Thanks!

Scott

4/15/2003

**Seery, Scott, Env. Health**

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**From:** Seery, Scott, Env. Health  
**Sent:** Thursday, February 13, 2003 9:25 AM  
**To:** Matt Katen (E-mail); Colleen Winey (E-mail)  
**Subject:** Shell station - 3790 Hopyard Rd.

Matt, Colleen

Just wanted to send you a few notes before our meeting today, with concerns and issues I hope to discuss.

Here's the big issue:

Recent CPT work only revealed how little we know about the geology at the site. Although mostly characterized as CLAY (CL), clearly there are more permeable stringers/lenses of silt, sand, and, in some cases, gravel that are likely contributing to MtBE transport away from the source. There appear to be gradational facies relationships at comparable depths as far out as CPT-2 that are consistent with both initial and stabilized DTW. In others, there appear to be discontinuous lenses in more remote locations (e.g., S-9) of coarse grained sediments where MtBE impacts are also noted. These relationships need to be further investigated through completion of additional CPT or Geoprobe transects normal to general GW flow. Until this is done, the Site Conceptual Model (SCM) is really unknown. Before this is completed, in my view, I cannot feel too comfortable with a single multi-level "sentinel" well site as we have originally contemplated near CPT-2 if we are really sure the actual path(s) we should be tracking.

However, there appear to be as many as 7 discrete zones that CPT-2 identified that should be considered for depth-discrete, short-screened monitoring. This may be better refined once the SCM is better understood and we can pare down these potential zones once we have the 3-D characterization of the site completed. I guess it is up for discussion whether we throw hardware in the ground now, or wait until the transects and profiling are completed.

Other thoughts:

Need to put Shell to task to identify the location of the abandoned irrigation well. This has been a topic since last May, and we should not allow a half-hearted attempt to locate it when the contractor is out there preparing the pad for the interim remediation compound, as is now the planned course of action according to Cambria. We should request a discrete task to pothole in search for this well, not an aside task as it now appears to be.

X-sections lack adequate resolution, inconsistent with logs, too generalized; on-site well section profiles fail to show the (relatively) coarser-grained lithologies seen in the original logs as silty/sandy stringers and gravelly zones; these appear consistent in some cases with initial or stabilized DTW measurements (Ex: S-7 @ 15' bg; S-10 @ 10' and 24' bg)

Historic wells are built with excessive screen lengths (20 - 30'). These "traditional" wells are lousy at deducing depth-specific occurrence of MtBE (dilution), and can introduce MtBE to deeper zones that might not have otherwise been impacted. Need to be replaced with multi-level screened wells. The to-be-requested CPT work may help locate good sites for these new replacement wells.

Need vertical gradient determinations

Need source area investigation; depth-discrete sampling (soil/water); vertical profiling; mass calculations; etc.

Rose diagrams for GW flow need to go back further in time (only go as far back as 1997 thus far), yet there are data as far back as 1988.

Scott

2/13/2003

**Seery, Scott, Env. Health**

---

**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Tuesday, February 11, 2003 8:57 AM  
**To:** Seery, Scott, Env. Health  
**Cc:** dlundquist@cambria-env.com; mkaten@zone7water.com; cwiney@zone7water.com; Drogos, Donna, Env. Health; KEPetryna@shellopus.com  
**Subject:** Re: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

**Lost Irrigation Well:** We completed an aerial photograph review to locate the metal and wooden tanks noted in the DWR well form. We obtained photographs from 1954 (earliest available for the area) and 1957, as well as a more recent 1992 photograph for comparison. Both the 1954 and 1957 photographs show the area to be primarily agricultural. Both photographs also have an indeterminate object located in a field which corresponds to the location of the metal and wooden tanks noted adjacent to the well as drawn on the DWR form. When overlain with the more recent aerial photograph, the object shown on the historic aerial photographs appears to be currently beneath a building. I will bring the aerial photographs we obtained to the meeting with me.

We also completed a search for historical Sanbourn maps which typically show above ground tank locations, but no coverage was available for that area.

In addition, we contacted a utility locator to mark the potential location provided by Zone 7. Using this information and a metal detector, Virgil Chavez Land Surveying marked out a potential location behind the station building which corresponds with the location of the compound for the fixed groundwater extraction system we are currently installing at the site. We are planning to have the system installation subcontractor excavate the location marked by the surveyor for any sign of the abandoned irrigation well.

**Sanitary Sewer Lines:** We obtained a map of the sanitary sewer lines in the vicinity of the site and determined that the lines for the site vicinity are located upgradient from the site beneath Las Positas Road west of Hopyard Road. The location and available flow line data for these lines are shown on the site plan I faxed to you last week. Virgil Chavez Land Surveying field verified that no sanitary sewer manholes are present beneath Hopyard Road south of Las Positas Boulevard in the site vicinity.

Jacquelyn

At 04:48 PM 2/10/2003 -0800, Seery, Scott, Env. Health wrote:

>>>>

2/11/2003

Hi Jacquelyn

In reviewing the case in prep for our Thursday meeting, I was reminded of a couple of issues.

Any updates on the search for the long-lost irrigation well 3S/1E-7Q1 ?

Was there a survey completed to locate the sanitary sewers lines in vicinity to the site?

Any updates will be appreciated. Thanks!

Scott

<<<<

Jacquelyn L. Jones

Project Geologist

Cambria Environmental Technology, Inc.

5900 Hollis Street, Suite A, Emeryville, CA 94608

Direct Line: (510) 420-3316

Fax: (510) 420-9170

**Seery, Scott, Env. Health**

---

**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Wednesday, February 05, 2003 4:36 PM  
**To:** sseery@co.alameda.ca.us; KEPetryna@shellopus.com  
**Cc:** dlundquist@cambria-env.com; mderby@cambria-env.com; mkaten@zone7water.com; cwiney@zone7water.com; ddrogos@co.alameda.ca.us  
**Subject:** Re: Fwd: meeting schedule: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

As requested, Cambria prepared a cross-section showing the site wells, CPT-1 and CPT-2, and wells Hop1 and Hop6. Due to the scale of this cross-section, Cambria also prepared a zoomed-in version showing the site wells and the CPT borings only. I've attached a site map, a regional map and the two noted cross-sections. I have also attached the CPT-2 boring log (installed 11/25/02, inadvertently labelled CPT-1), and an excel file which contains tables detailing soil sample analytical results (from S-11 and S-12) and grab groundwater sample analytical results (from CPT-1 and CPT-2). This new information coupled with the information sent to you in October should include everything from the current investigation. Please let me know if you can not open any of the attached documents.

Also, I would like to confirm Cambria's attendance and Karen Petryna's attendance to the below mentioned meeting scheduled for February 13th at 11:00 am at the Zone 7 office in Pleasanton. Please call me if you have any questions or comments, or if you need any further information from me before the meeting.

Thank you,

Jacquelyn Jones

>>>>

>>>>

From: "Seery, Scott, Env. Health"

To: "mkaten@zone7water.com" ,

"cwiney@zone7water.com" ,

"kepetryna@equiva.com" ,

"jjones@cambria-env.com"

2/6/2003



RO0000363

February 27, 2003

Ms. Karen Petryna  
Shell Oil Products Company 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: SWI, SCM and CAP for Shell Station, 3790 Hopyard Road, Pleasanton, CA**

Dear Ms. Petryna:

This letter follows a review of the fuel leak case file for the above referenced site, and our 13 February 2003 meeting with representatives of Zone 7 Water Agency and your consultant, Cambria Environmental Technology, Inc. (Cambria). As we discussed, this office is concerned with the presence of the gasoline oxygenate Methyl tert-Butyl Ether (MtBE) at the site, the site's location above the primary, producing drinking water basin in Pleasanton, and its proximity to active municipal drinking water wells. This letter presents a request to complete a Soil and Water Investigation (SWI), Site Conceptual Model (SCM), and prepare a Corrective Action Plan (CAP) for the subject site in accordance with California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be considered as part of the required SWI, SCM and CAP. **We request that you prepare and submit a work plan for the SWI by April 14, 2003, that addresses each of the following comments.**

#### TECHNICAL COMMENTS

##### 1. Preferential Pathway Study

A utility conduit study was previously prepared for the site, the results of which were published in a Cambria report entitled *Sensitive Receptor Survey Report*, dated April 9, 2002. This report provided professional interpretation of the data and a set of annotated maps showing certain utility locations and reported depths. We have since received updated maps that show the utilities in locations that are in significant conflict with their depiction in the referenced Cambria report. A professional interpretation of these new data has not been rendered, and the updated maps remain incomplete in their level of detail. We request that these new data be confirmed for accuracy, the maps accurately completed, and a professional interpretation presented.

You may present the requested professional interpretation and final utility conduit map(s) in the pending SWI workplan.

In addition, a long-abandoned ~172-foot deep irrigation well has been the subject of a records review and survey effort by Cambria since early last year. Its exact location, however, is still in question. Cambria's survey work potentially places this well behind the current station building, yet other data shared at the recent meeting places this well (or another) beneath a commercial building on another property some 300-feet to the SSE (3730 Hopyard Rd.). As you know, an abandoned irrigation well with unknown perforation intervals in proximity to a fuel release site could pose a risk to deeper aquifers. It is unknown as of this writing whether this abandoned irrigation well will be discovered during planned excavation work at the site. This issue needs to be resolved quickly and the well properly destroyed, if at all possible.

Please refer to the document entitled "*Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE*", American Petroleum Institute Publication No. 4699, dated February 2000. Section 3.3.2.4 of this document discusses how one may map hydraulic heads in shallow aquifers to note areas of groundwater flow convergence that may correspond to an abandoned well acting as a flow conduit between aquifers.

Please present your final plan of action to address the irrigation well issue in the pending SWI workplan.

## 2. Site Conceptual Model

Starting with a critical review of the updated conduit study and data from previous investigations and tank operational records for this site, you are to develop the initial three-dimensional SCM of site conditions. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP).

We have identified, based on review of existing data, what we see as key data gaps and have described in this letter several tasks we believe will provide useful new data in pursuit of refinement to the initial SCM.

Your attention is directed to the cited API Publication No. 4699 as a resource for development of the SCM. Your attention is also directed to the State Water Resources Control Board (SWRCB) "*Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft*", dated March 27, 2000, as well as the June 2002 ChevronTexaco Energy Research and Technology Company technical bulletin entitled "*Mass Flux Estimates to Assist Decision-Making*" to help in development and strategies for refinement of the SCM, among other related tasks. I can provide copies of any of these documents if you need them.

You are requested to use this initial SCM to help you determine the appropriate configuration for samplings points in the pending SWI phase of work at this site. Please discuss in the SWI workplan your analysis and interpretation of the results of the conduit study and SCM, and explain your rationale for the configuration of proposed sampling points.

### 3. Contaminant Plume Definition – Soil and Groundwater

The purpose of contaminant plume definition is to determine the *three-dimensional* extent of contamination in soil and groundwater, including a determination of 3-D extent of impacts in the source area(s) and released contaminant mass, and a demarcation of potential geogenic and anthropomorphic flow pathways. As you know, up to 100,000 parts per billion (ppb) MtBE was detected in tank excavation well T-2 as recently as June 2002. MtBE has also been detected at concentrations as high as 11,000 ppb and 8300 ppb in off-site wells S-6 and S-7, respectively. MtBE has also been detected consistently in off-site well S-9.

Note that nearly all wells completed in the shallow water-bearing formation have screen intervals of between 20 and 30-feet. Such long screens do not lend confidence in the sampling data for a variety of reasons, and do not assist in determining the depth-discrete concentration gradients necessary to appropriately evaluate the distribution of MtBE at this site. Therefore, monitoring at multiple depths is required at and downgradient of your site.

Recent cone penetrometer (CPT) work revealed the presence of interbeds of silty clay / clayey silt in materials encountered in CPT-2 at depths that appear consistent with initial and stabilized groundwater noted in adjacent well S-12. Sediments logged as "clay" are found both above and below these two silty intervals. Clearly, these silty layers are not what one would expect to be "classic" water bearing sediments, but may reflect the relative permeability differentials that contribute to fluid movement through the formation in this localized environment. These silty layers were not identified in CPT-1, as it was logged as penetrating clay to ~53' below grade (bg), with a single interbed of "organic soil" between ~13 and 16' bg. However, logs of various other historic wells did identify occasional coarser-grained (silt, sand, gravel) horizons and stringers in an otherwise fine-grained suite of sediments. A few lenses of "peat" were also identified locally.

Based on reviewed boring logs, encountered sedimentary sequences appear somewhat inconsistent from one boring location to another. Because of these characteristics, further assessment is necessary to better understand site geology and hydrogeology. We therefore request a three-dimensional MtBE investigation of both the source area(s) and as transect(s) oriented normal to the trend of apparent groundwater flow. The vertical distribution of impacts is to be determined. Mass-balance calculations are to be completed for the source area(s). Vertical groundwater gradients are also to be determined. The SWI workplan should present your plan to accomplish these tasks.

Conventional investigation techniques and monitoring well networks currently used at fuel leak sites, including this one, are generally insufficient to adequately characterize MtBE impacts. It is recommended that your investigation initially incorporate expedited site assessment techniques and borings. The borings are to be continuously cored and logged, with close attention paid to changes in lithologies that might facilitate solute transport (e.g., silty/sandy stringers in otherwise fine grained sediments). The methodology employed should minimize the potential for cross-contamination.



Soil samples should be collected for laboratory analysis at 5 foot intervals, areas of obvious contamination, the soil/groundwater interface, and at each lithologic change noted during boring advancement, at a minimum. Water samples are to be collected at discrete depths to total depth explored. Detailed cross-sections, fence diagrams, structural contours and isopachs, and rose diagrams for groundwater flow (incorporating all historic data), should be subsequently incorporated into the interim *and* final SWI reports, as appropriate. Cross-sections should be scaled to clearly illustrate subsurface lithologies, including the locations of stringers and other zones of relatively-higher permeability, particularly in those areas where such zones may be intercepted by buried utilities.

Final well locations and screen depths will be substantially based on the results of the SWI and refined SCM. The monitoring of multiple discrete water-bearing zones with short screened intervals is anticipated. Generally, these screened intervals should not be greater than 2' in length. We will expect that the Interim SWI Report will propose the locations of such wells, the anticipated well screen depths, their configurations (e.g., well cluster or multi-level), and the reasoning behind the location and configuration of each.

Discuss your proposal for performing this work outlined, above, in the SWI work plan. The updated results of the conduit study, and the initial SCM, are to be presented and discussed in the SWI work plan to justify your proposed scope of work.

Expedited site assessment tools and methods are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of the plume. Technical protocol for expedited site assessments are provide in the US EPA "*Expedited Site Assessment Tools for Underground Storage Tank Sites: A guide for Regulators*" (EPA 510-B-97-001), dated March 1997.

#### 4. Corrective Action Plan

The purpose of the CAP is to use the information obtained during investigation activities to propose cost-effective **final cleanup objectives and remedial alternatives for both soil and groundwater impacts, including those caused by MtBE and other fuel oxygenates**, that will adequately protect human health and safety, the environment, eliminate nuisance conditions, and protect water resources.

A final CAP for the soil and groundwater impacts caused by an unauthorized release at the site will be requested upon completion of the SWI in accordance with the schedule specified below. The CAP shall address at least two technically and economically feasible methods to restore and protect beneficial uses of water and to meet the cleanup objectives for each contaminant established in the CAP. The CAP must propose verification monitoring to confirm completion of corrective actions and evaluate CAP implementation effectiveness.

### TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

**April 14, 2003** – Work plan for Soil and Water Investigation

Ms. Karen Petryna  
Re: 3790 Hopyard Rd., Pleasanton  
February 27, 2003  
Page 5 of 6

**60 Days from SWI Work Plan Approval – Interim Soil and Water Investigation Report** (which contains the results of the initial SWI assessment work, and a proposal for the installation of new monitoring wells)

**90 Days from Completion of Soil and Water Investigation – Soil and Water Investigation Completion Report** (which incorporates all data generated during completion of SWI, including the installation of the new monitoring wells)

**90 Days after Submittal of Soil and Water Investigation Completion Report - Corrective Action Plan**

**April 15, 2003** – Quarterly Report for the First Quarter 2003

**July 15, 2003** – Quarterly Report for the Second Quarter 2003

**October 15, 2003** – Quarterly Report for the Third Quarter 2003

**January 15, 2004** – Quarterly Report for the Forth Quarter 2004

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately-registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

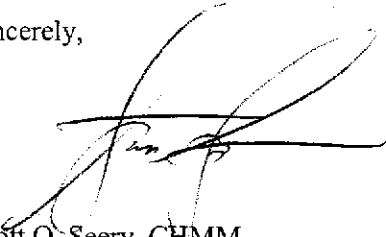
#### **AGENCY OVERSIGHT**

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

Ms. Karen Petryna  
Re: 3790 Hopyard Rd., Pleasanton  
February 27, 2003  
Page 6 of 6

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott O. Seery". The signature is stylized with a large, sweeping initial "S" and a horizontal line across the middle.

Scott O. Seery, CHMM  
Hazardous Materials Specialist

c: Betty Graham, RWQCB  
Dave Charter, SWRCB UST Fund  
Matt Katen, Zone 7 Water Agency  
Danielle Stefani, Livermore-Pleasanton Fire Department  
Jacqueline Jones, Cambria Env. Technology, Inc., 1144 - 65<sup>th</sup> St., Ste. B, Oakland, CA 94608



November 8, 2002

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

Alameda County

NOV 14 2002

Environmental Health

Re: **Agency Response**  
Shell-branded Service Station  
3790 Hopyard Road  
Pleasanton, California

Dear Ms. Stephani:

Equilon Enterprises LLC dba Shell Oil Products US (Shell) is submitting this *Agency Response* in regards to an October 15, 2002 Alameda County Health Care Services Agency (ACHCSA) letter addressed to the Livermore-Pleasanton Fire Department

As your agency is aware, SB-989 upgrades were completed at the site during late July and early August 2002. The upgrade work consisted of the following:

- Replacement of existing fiberglass lines to double-wall fiberglass product, vapor return, and vent lines
- Installation of EVR-approved fill and Phase 1 vapor recovery system
- Installation of sumps for containment of tank fill/vapor risers
- Replacement of containment sumps on turbine side of tanks
- Replacement of existing dispenser containment to deep FG dispenser containment

Shell also offers the following information regarding the subject location also in response to inquires by ACHCSA. Based on asset ledger information, the service station was constructed in 1970, and the current tanks were installed in 1989. The tanks are double-wall fiberglass, and the vapor recover system at the site is a vacuum-assisted system.

Please call me at (925) 957-0203 if you have any questions or comments.

Sincerely,  
Shell Oil Products US

Perry Pineda  
Facility Engineer

Danielle Stefani  
November 8, 2002  
Page 2

cc: Chuck Headlee, RWQCB, 1515 Clay Street, Suite 1400, Oakland, CA 94612  
Scott Seery, Alameda County Health Care Services Agency, 1131 Harbor Bay  
Parkway, Suite 250, Alameda, CA 94502-6577  
Paul Smith, Livermore-Pleasanton Fire Department, 4550 East Avenue, Livermore,  
CA 94550  
Matthew W. Katen, Zone 7 Water Agency, 5997 Parkside Drive, Pleasanton, CA  
94588-5127

cc by email: Karen Petryna, Shell Oil Products US  
Aura Sibley, Shell Oil Products US

**Seery, Scott, Env. Health**

**From:** Seery, Scott, Env. Health  
**Sent:** Wednesday, November 06, 2002 4:08 PM  
**To:** 'Jacquelyn Jones'  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); KEPetryna@equiva.com; Drogos, Donna, Env. Health; dlundquist@cambria-env.com; mderby@cambria-env.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

<b>Tracking: Recipient</b>	<b>Delivery</b>
'Jacquelyn Jones'	
Matt Katen (E-mail)	
Colleen Morf (E-mail)	
KEPetryna@equiva.com	
Drogos, Donna, Env. Health	Delivered: 11/6/2002 4:08 PM
dlundquist@cambria-env.com	
mderyby@cambria-env.com	

Hi Jacqueline

Thank you for your series of detailed discussions. I appreciate that you have been staying on top of this case as rigorously as you have. During the days and weeks since the first CPT was advanced at the site, and the first and second off-site wells completed, I've been discussing the case at various times with Matt and Colleen at Zone 7, including just this afternoon.

In response to your request for what we should do next, I offer the following:

- First, the second CPT must be scheduled ASAP and completed as originally contemplated.
- Second, once the preliminary field work (i.e., CPTs) is complete, the lithologic data are to be presented on a set of x-sections that incorporate, at a minimum, the Shell monitoring wells, the CPTs, and muni wells Hop1 and Hop 6.
- Third, once the field work and x-sections have been completed, we will all need to meet to strategize well screen intervals for the planned deeper off-site well(s). Once we have all had the chance to determine appropriate well screen(s), the (hopefully) final field mobilization and well construction(s) may be completed.

Please let me know when the CPT work has been scheduled. Thanks, again, for your attention this project!

Scott

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**Seery, Scott, Env. Health**

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**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Wednesday, November 06, 2002 4:57 PM  
**To:** Seery, Scott, Env. Health  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); KEPetryna@equiva.com; Drogos, Donna, Env. Health; dlundquist@cambria-env.com; mderby@cambria-env.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

The second CPT boring installation has been scheduled for November 25, 2002, pending encroachment permit approval. As requested, once we've completed that boring, we will prepare a cross-section showing the site wells, the CPT borings and the municipal wells Hop1 and Hop6.

Thank you,

Jacquelyn Jones

At 04:07 PM 11/6/2002 -0800, Seery, Scott, Env. Health wrote:

>>>>

Hi Jacqueline

Thank you for your series of detailed discussions. I appreciate that you have been staying on top of this case as rigorously as you have. During the days and weeks since the first CPT was advanced at the site, and the first and second off-site wells completed, I've been discussing the case at various times with Matt and Colleen at Zone 7, including just this afternoon.

In response to your request for what we should do next, I offer the following:

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**Seery, Scott, Env. Health**

**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Wednesday, November 06, 2002 11:59 AM  
**To:** Seery, Scott, Env. Health  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); KEPetryna@equiva.com; Drogos, Donna, Env. Health; dlundquist@cambria-env.com; mderby@cambria-env.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

Cambria has not put together formal cross-sections for the site. We were, however, provided during the May 23, 2002 meeting with cross-sectional diagrams put together by Exxon following an extensive investigation at their nearby site. The Exxon cross-sections also include the City of Pleasanton municipal wells. The purpose of proposing our CPT borings was to evaluate lithology in the vicinity of the Shell site to use in design of the screen intervals for deep well installation. Originally we proposed two CPT borings, but were initially delayed in drilling the offsite boring due to the City of Pleasanton's work. **We have done a side-by-side comparison of our onsite CPT log with the cross-sections prepared by Exxon, and determined that the lithologies correlate reasonably consistently.** Therefore we felt that we had sufficient data for installation of the deep wells, and that the offsite CPT boring would not provide enough additional useful information to justify delaying the deep well installation offsite in the downgradient direction.

Available data from Shell's shallow wells, S-2 through S-12 and SR-1 through SR-3, shows consistent clays to a depth of 35 feet below grade (fbg). The onsite CPT boring showed a consistent clay unit to a depth of approximately 53 fbg, underlain by interbedded silts and sands to approximately 81 fbg, underlain by silts to the total explored depth of 120 fbg. The plan I discussed with you during our September 23, 2002 telephone conversation was to install at least one downgradient deep well across Hopyard Road from the site between the site and the nearest municipal well. We would install a conductor casing to approximately 30 fbg, and continuously-core the deep well in order to determine the best screen interval at that location. **Based on the CPT log, (on-site CPT log) we'd plan on screening the well between 70 and 80 fbg, where the sand units were detected most frequently.** The exact screen interval would be determined in the field.

Our reasoning on this is not that the second CPT boring is unnecessary, but rather that, in light of the proximity of the active municipal wells, and using data already available to us, we'd prefer to move forward with deep well installation sooner rather than later. The information we collected from onsite CPT installation coupled with the information we would collect by continuous-coring the deep well, would be sufficient for determining an appropriate screen interval for a deep well.

It was my understanding after our telephone conversation on September 23, 2002 that you wanted to review the data we had collected so far and then coordinate a meeting between Cambria, Shell, Zone 7 and the ACHCSA prior to determining a set plan for future work, whether it be deep well installation or completing the offsite CPT boring. I sent this information to you on October 16, 2002 as soon as initial groundwater results were received from new wells S-11 and S-12. We'd be glad to



meet with you and Zone 7, or to move forward with the second CPT installation prior to deep well installation if you feel that is necessary, or to complete cross-sectional diagrams showing our onsite CPT boring and the nearest municipal well. Alternatively, we are prepared to move forward with deep well installation as described above and can provide you and Zone 7 with a work plan.

Please let me know how you would like us to proceed.

Jacquelyn Jones

At 01:36 PM 11/1/2002 -0800, Seery, Scott, Env. Health wrote:

>>>>

Hi Jacqueline

Thank you for the recent data for this site. You mentioned that you were thinking the second CPT unnecessary due to an interpretation that lithologies logged while advancing the CPT were a pretty good match to lithologies noted in logs for one or more muni wells you got from Zone 7.

I wondered, first, if Cambria has put together x-sections illustrating that correlation, and if so, two, whether they are in a format that you could easily mail to this office and Zone 7?

Please let me know. We'd like to take a look at these x-sections before deciding that the second CPT is unnecessary. Thanks!

Scott

<<<<

Jacquelyn L. Jones

Project Geologist

Cambria Environmental Technology, Inc.

1144 65th Street, Suite B, Oakland, CA 94608

Direct Line: (510) 420-3316

Fax: (510) 420-9170

**Seery, Scott, Env. Health**

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**From:** Seery, Scott, Env. Health

**Sent:** Friday, November 01, 2002 1:37 PM

**To:** 'Jacquelyn Jones'

**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); KEPetryna@equiva.com; Drogos, Donna, Env. Health

**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

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Please let me know. We'd like to take a look at these x-sections before deciding that the second CPT is unnecessary. Thanks!

Scott

**Seery, Scott, Env. Health**

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**From:** Seery, Scott, Env. Health  
**Sent:** Monday, October 28, 2002 4:19 PM  
**To:** 'Colleen Morf'; 'Matt Katen'  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Colleen, Matt

I've received the log (among other data) from Cambria for the CPT boring that was installed at the station several weeks ago. You might recall that Cambria (Jacquelyn Jones) claimed that the need for the second CPT, planned for installation on the arroyo levee, may be unnecessary now. They felt there was a good correlation between the CPT and the Zone 7 well logs, so the second CPT would be redundant.

I haven't seen any x-sections illustrating that correlation, but I wondered what ya'll thought would be the next appropriate step. Request the 2nd CPT? Request a x-section showing the correlations (as did the consultant for the Exxon project)? Or just meet to discuss?

Please let me know your thoughts.

Scott

**Seery, Scott, Env. Health**

---

**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Wednesday, October 23, 2002 11:10 AM  
**To:** Seery, Scott, Env. Health  
**Cc:** dlundquist@cambria-env.com; mderby@cambria-env.com; KEPetryna@shellopus.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

The CPT log included was for the boring installed onsite in the northwest corner near well S-3. ~~The CPT boring proposed adjacent to the Arroyo canal has not been installed.~~

Jacquelyn

At 02:37 PM 10/17/2002 -0700, Seery, Scott, Env. Health wrote:

>>>>

Thanks for the data set, Jacquelyn. I did have trouble opening the site map, but no matter. Just let me know this, please: which CPT boring did you include here - the one emplaced on-site, or the one along the arroyo? Was the other CPT log available?

--S.

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

**From:** Jacquelyn Jones [mailto:jjones@cambria-env.com]  
**Sent:** Wednesday, October 16, 2002 5:23 PM  
**To:** Seery, Scott, Env. Health; 'Diane Lundquist'  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); KEPetryna@equiva.com; mderby@cambria-env.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

Attached is the following:

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



October 22, 2002

RO 363

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, 3790 Hopyard Road, Pleasanton - Request for Total Fuel Oxygenate Analyses

Dear Ms. Petryna:

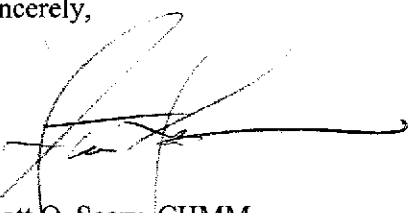
The case file for the referenced site was recently reviewed, up to and including the September 2002 Cambria Environmental Technology second quarter 2002 monitoring report. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the 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., 1144-65<sup>th</sup> St., Ste. B, Oakland, CA 94608

**Seery, Scott, Env. Health**

**From:** Seery, Scott, Env. Health  
**Sent:** Thursday, October 17, 2002 2:37 PM  
**To:** 'Jacquelyn Jones'  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Thanks for the data set, Jacquelyn. I did have trouble opening the site map, but no matter. Just let me know this, please: ~~which CPT boring did you include here - the one emplaced on-site, or the one along the arroyo?~~  
 Was the other CPT log available?

--S.

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

**From:** Jacquelyn Jones [mailto:jjones@cambria-env.com]  
**Sent:** Wednesday, October 16, 2002 5:23 PM  
**To:** Seery, Scott, Env. Health; 'Diane Lundquist'  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); KEPetryna@equiva.com; mderby@cambria-env.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

Attached is the following:

- the most recent quarterly monitoring results (from Blaine),
- tabulated soil analytical results from wells S-11 and S-12 and grab groundwater analytical results from the CPT boring,
- the CPT boring log,
- S-11 and S-12 boring logs / well diagrams,
- and a site plan.

Please let me know if you have trouble with any of the attached files. I will be out of the office starting tomorrow, returning next Wednesday, but you can contact Diane Lundquist in my absence.

Jacquelyn Jones

At 02:47 PM 10/10/2002 -0700, Seery, Scott, Env. Health wrote:

>>>>

Hi Jacqueline and Diane

I wondered if you had the chance to generate a data packet, as was discussed a couple weeks ago.

Scott

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

**From:** Seery, Scott, Env. Health

**Sent:** Monday, September 23, 2002 10:52 AM

**To:** 'Colleen Morf'; Matt Katen

**Cc:** kepetryna@equiva.com; 'Diane Lundquist'; 'jjones@cambria-env.com'; Drogos, Donna, Env. Health

**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Colleen, Matt

Jacqueline (Cambria) informed me today that the shallow wells proposed for installation on the east side of Hopyard (S-11) and along the Arroyo Mocho levee (S-12) have been completed. Water sample results are pending. The on-site CPT (one of two proposed) has also been completed. She was suggesting that the second CPT, initially planned for completion along the levee near S-12, may not be necessary, now, because of apparent close correlation of on-site lithologies to logs of muni wells supplied by Zone 7. I requested that we all receive a data summary packet to review, and then arrange to meet face-to-face at your office to mull over the next step, be it more CPT data, deep well(s) installations, or ?

I'll keep you informed.

Scott

<<<<

**Seery, Scott, Env. Health**

---

**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Wednesday, October 16, 2002 5:23 PM  
**To:** Seery, Scott, Env. Health; 'Diane Lundquist'  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); KEPetryna@equiva.com; mderby@cambria-env.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

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- the CPT boring log,
- S-11 and S-12 boring logs / well diagrams,
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**Sent:** Monday, September 23, 2002 10:52 AM



**To:** 'Colleen Morf'; Matt Katen

**Cc:** kepetryna@equiva.com; 'Diane Lundquist'; 'jjones@cambria-env.com'; Drogos, Donna, Env. Health

**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

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I will keep you informed.

Scott

<<<<

2/7/2003

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



October 15, 2002

RO 363

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

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, 3790 Hopyard Road, Pleasanton

Dear Ms. Stefani:

This letter is sent in follow-up to review of the recent sampling report for the subject Shell site. Recent laboratory data for ground water samples show a marked increase in methyl tert butyl ether (MtBE) concentrations when compared to previous sampling events.

MtBE was identified during the September 2001 sampling event at concentrations of up to 29,000 ug/l in underground storage tank (UST) backfill well T-2 using EPA Method 8260. In June 2002, the concentration of MtBE in samples collected from this well increased to 100,000 ug/l. This marks the highest MtBE concentration observed at this site to date.

These data appear to demonstrate that releases from the UST system continue to occur at this site. This information is being brought to your attention as a courtesy in order to assist the city in its role to ensure UST compliance by the operator.

Equilon Enterprises LLC dba Shell Oil Products has been employing periodic mobile remediation measures. A plan to construct an interim remediation system has already been approved by this office. Additional off-site wells have recently been installed, with one or more additional wells planned once the results of cone penetrometer testing are reviewed and deeper aquifer lithologies determined.

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

Sincerely,

Scott O. Seery, CHMM  
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB  
Matt Katen, Zone 7 Water Agency  
Steve Cusenza, Pleasanton Public Works Agency  
Karen Petryna, Shell Oil Products US, P.O. Box 7869, Burbank, CA 91510-7869

Shell  
3790 Hopyard Rd., Pleasanton

9-30-02



well S-11



well S-12



well S-12

**Seery, Scott, Env. Health**

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**From:** Seery, Scott, Env. Health  
**Sent:** Monday, September 23, 2002 10:52 AM  
**To:** 'Colleen Morf'; Matt Katen  
**Cc:** kepetryna@equiva.com; 'Diane Lundquist'; 'jjones@cambria-env.com'; Drogos, Donna, Env. Health  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	'Colleen Morf'	
	Matt Katen	
	kepetryna@equiva.com	
	'Diane Lundquist'	
	'jjones@cambria-env.com'	
	Drogos, Donna, Env. Health	Delivered: 9/23/2002 10:52 AM

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I'll keep you informed.

Scott

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



September 9, 2002

RO 363

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, 3790 Hopyard Road, Pleasanton – Interim Remediation Work Plan

Dear Ms. Petryna:

This letter is sent following our review of the August 28, 2002, *Interim Remediation Work Plan*, submitted by Cambria Environmental Technology, Inc. (Cambria). The referenced Cambria work plan proposes pumping shallow groundwater from existing extraction wells SR-1, SR-2, and SR-3, and tank backfill well T-3. Extracted water will be routed through subgrade piping to a storage tank located in a treatment compound to be constructed behind the station building. Extracted water will eventually be pumped from the storage tank and through a series of carbon vessels prior to being discharged to the sanitary sewer under permit from the local sanitary district.

This interim remediation plan is accepted as submitted.

Please provide this office with copies of the final extraction system / treatment compound engineering drawings, reduced in size to standard 11x17" format.

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

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

c: Chuck Headlee, RWQCB  
Matt Katen, Zone 7 Water Agency  
Steve Cusenza, Pleasanton Public Works Agency  
Danielle Stefani, Livermore-Pleasanton Fire Department  
Jacquelyn Jones, Cambria Env. Technology, Inc.  
1144 – 65<sup>th</sup> St., Ste. B, Oakland, CA 94608

**Seery, Scott, Env. Health**

---

**From:** Seery, Scott, Env. Health  
**Sent:** Thursday, August 22, 2002 10:48 AM  
**To:** 'jjones@cambria-env.com'  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail)  
**Subject:** FW: ~~3790 Hopyard Road, Pleasanton~~ - work status

Jacquelyn

Do you have any updates for me on the project schedule? I understand from a City of Pleasanton contact that the paving appears to be completed on that portion of the arroyo levee in the area where we were planning to have both CPT and wells installed.

Scott

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

**From:** Jacquelyn Jones [mailto:jjones@cambria-env.com]  
**Sent:** Thursday, August 01, 2002 4:35 PM  
**To:** sseery@co.alameda.ca.us  
**Cc:** KEPetryna@equiva.com; dlundquist@cambria-env.com; mderby@cambria-env.com  
**Subject:** 3790 Hopyard Road, Pleasanton - work status

Scott,

As requested during our telephone conversation today, the below is a quick summary of the status of the investigation proposed at the site. The scope of work for this investigation was detailed in our June 12, 2002 *Investigation Work Plan* and the addendum I submitted to you via e-mail on July 22, 2002. A more detailed summary of the site activities will be submitted next week.

The onsite CPT boring was installed on July 26, 2002 near upgradient monitoring well S-3 as planned in the addendum.

The proposed monitoring well installation (well S-11 on the figure submitted with our June 12, 2002 work plan) within Hopyard Road east of the site was attempted on Monday, July 29, 2002, but was not completed due to field complications. We will reschedule this monitoring well installation for the earliest available drilling date and inform you of the schedule.

The proposed work within the easement of the Arroyo Mocho Canal will be postponed pending completion of the City of Pleasanton's current construction activities. We anticipate scheduling the field work in that area in mid-September.

8/22/2002

Jacquelyn

Jacquelyn L. Jones

Project Geologist

Cambria Environmental Technology, Inc.

1144 65th Street, Suite B, Oakland, CA 94608

Direct Line: (510) 420-3316

Fax: (510) 420-9170

**Seery, Scott, Env. Health**

---

**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Thursday, August 22, 2002 11:44 AM  
**To:** Seery, Scott, Env. Health  
**Cc:** Matt Katen (E-mail); Colleen Morf (E-mail); dlundquist@cambria-env.com; KEPetryna@equiva.com; mderby@cambria-env.com  
**Subject:** Re: FW: 3790 Hopyard Road, Pleasanton - work status

Scott,

I was going to call you today to let you know that we will be installing the monitoring well across Hopyard Road (labelled S-11 on our figure) this Monday, August 26th.

As for the well and CPT boring near Arroyo Canal, I believe the City wanted us to wait for installation until after their planned ribbon-cutting ceremony, but I will check in with them and get back to you on the schedule for that.

Jacquelyn

At 10:48 AM 8/22/2002 -0700, Seery, Scott, Env. Health wrote:

>>>>

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8/27/2002



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Cc: **KEPetryna@equiva.com; dlundquist@cambria-env.com; mderby@cambria-env.com**

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Project Geologist

8/27/2002

Cambria Environmental Technology, Inc.

1144 65th Street, Suite B, Oakland, CA 94608

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**Seery, Scott, Env. Health**

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Jacquelyn L. Jones

Project Geologist

Cambria Environmental Technology, Inc.

1144 65th Street, Suite B, Oakland, CA 94608

Direct Line: (510) 420-3316

Fax: (510) 420-9170

**Seery, Scott, Env. Health**

---

**From:** Jacquelyn Jones [jjones@cambria-env.com]  
**Sent:** Monday, July 22, 2002 5:30 PM  
**To:** sseery@co.alameda.ca.us  
**Cc:** KEPetryna@equiva.com; ddrogos@co.alameda.ca.us; cmorf@zone7water.com; mkaten@zone7water.com; dlundquist@cambria-env.com  
**Subject:** Shell-branded Service Station, 3790 Hopyard Road, Pleasanton - DRAFT e-mail addendum

Scott Seery,

In response to our telephone conversation on July 8, 2002 concerning Cambria's June 12, 2002 *Subsurface Investigation Work Plan* submitted for the referenced site, attached is an amended figure indicating an alternate boring location for the onsite CPT boring proposed.

As discussed, you were concerned with the potential for draw-down of chemicals of concern occurring while probing to the total proposed depth of 120 fbg in the southwest (downgradient) portion of the site. Cambria proposes to address this concern, while collecting accurate lithologic information from the targeted depth interval, by CPT probing in an upgradient location that is known not to contain chemical concentrations of concern in the shallow groundwater. We'd like to propose moving the CPT boring location to the northwest and upgradient corner of the station near monitoring well S-3. Monitoring well S-3 was added to the groundwater monitoring program in 1991. Maximum historical TPHg, benzene and MTBE concentrations of 70 ppb, 4.1 ppb and 0.66 ppb (by EPA Method 8260) have been detected in well S-3. Well S-3 has not contained TPHg, BTEX and MTBE since December 2001. Based on the lack of contamination in this portion of the property, concerns about draw-down of chemicals of concern should not be an issue drilling in this location. The installation of the onsite CPT boring and offsite well S-11 is currently scheduled for July 25th and 26th, which is Thursday and Friday of this week.

Per your voice mail, I understand that you are currently out of the office and have been out of the office since July 15, 2002. This morning, I spoke with Donna Drogos, the listed contact on your voice mail, who indicated that no one was available to review this addendum prior to the scheduled drilling dates. She recommended that I contact you via e-mail, as you may be checking your messages. She also indicated that your return date is expected to be July 29, 2002, but may change. Since this site is such a high priority and due to the difficulty of rescheduling drilling contractors during this busy season, we'd like to move forward with the drilling as scheduled. If you could get back to me prior to these dates with your comments on the amended CPT location and the location of proposed well S-11, we would greatly appreciate it. If we do not hear from you, Shell Oil Products US (Shell) has requested that we move forward with the scheduled installation of the CPT boring in the amended location and with the installation of offsite well S-11. We understand that this may mean that the Alameda County Water District will request additional work to be performed at the site.

In addition, we've contacted Zone 7 in reference to obtaining an encroachment permit for the installation adjacent to Arroyo Mocho Canal of an offsite CPT boring and proposed monitoring well S-12. They indicated that the City of Pleasanton is currently constructing an upgraded bicycle path

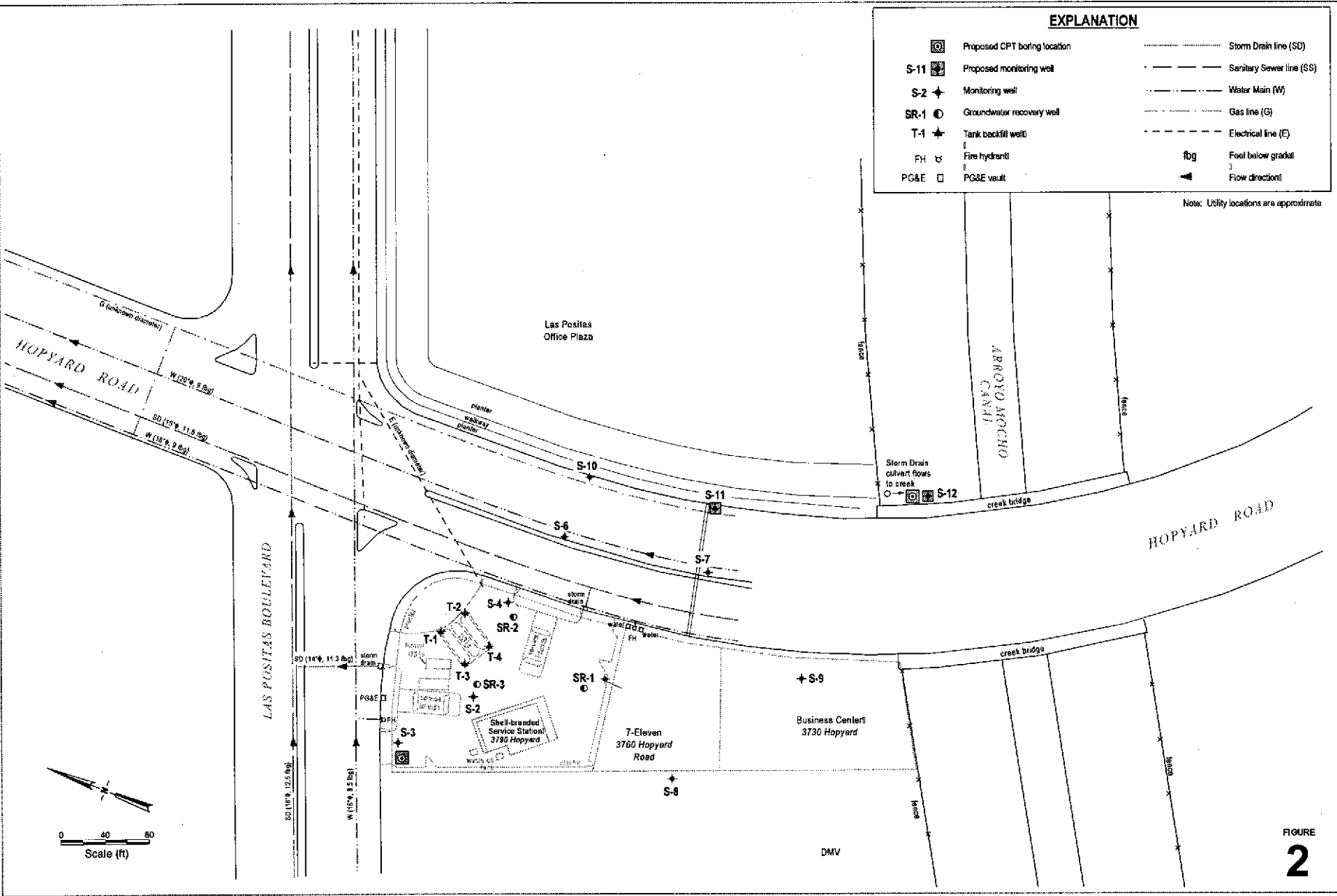
7/29/2002

along the northern bank of the Arroyo Mocho Canal where the boring and well were proposed. According to the City of Pleasanton, we will be unable to access this location until at least the middle of September 2002. We understand that this site is a high priority and would like to get your feedback as to whether an amended location for that CPT boring and for proposed monitoring well S-12 would be more suitable based on the delayed schedule. Please call to discuss this scheduling matter at your earliest convenience.

Thank you for your time and cooperation.

Jacquelyn Jones

07/16/02



EXPLANATION	
	Proposed CPT boring location
	Proposed monitoring well
	Monitoring well
	Groundwater recovery well
	Tank backfill well
	Fire hydrant
	PG&E vault
	Storm Drain line (SD)
	Sanitary Sewer line (SS)
	Water Main (W)
	Gas line (G)
	Electrical line (E)
	Feel below grade
	Flow direction

Note: Utility locations are approximate

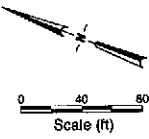


FIGURE 2

G:\PLEASANTON\3780HOPYARD\FIGURE\SITEPLAN-7-02.dwg

Siteplan



C A M B R I A

Shell-branded Service Station

3780 Hopyard Road  
Pleasanton, California  
Incident #98995842

**Seery, Scott, Env. Health**

---

**From:** Diane Lundquist [dlundquist@cambria-env.com]  
**Sent:** Monday, June 17, 2002 10:31 AM  
**To:** Seery, Scott, Env. Health; mkaten@zone7water.com; cmorf@zone7water.com  
**Cc:** kepetryna@equiva.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Scott,

Collen Morf provided information to me regarding the well on the Hacienda property. It is 41.5 feet deep piezometer. No water quality data is available for it. She also provided me with a copy of the boring log.

We have asked our surveyor to provide a benchmark for creek elevations, although Matt Katen mentioned that they have a benchmark we can also use. Colleen also provided information on the canal; I have copied her email below.

You should have the work plan for review, which was submitted last week. I'm sure we'll talk soon after your review. Please call me with any questions you may have in the meantime.

From Colleen's email:

>Here is the information about the stretch of Mocho and the monitoring well

>we discussed in our meeting on May 23. The stretch of Mocho south of the

>Shell station site is a gaining stream. This is due to the discharge of

the

>storm drains into the arroyo in this area. There is also no recharge along

>this stretch. We do own the access channels off of Hopyard. If you need

>access to the Mocho just let me know and I can arrange something.

>

>We don't have a lot of information on well 3S/1E 7Q 3, located northeast

of

2/7/2003

>the site. The well is a 41.5 foot deep piezometer installed for Hacienda  
>Business Park. We don't have any water level or water quality data for  
this

>well. The well was reported as unlocatable November 12, 1986. There is a  
>boring log which I can mail over to you.

At 11:59 AM 6/10/02 -0700, Seery, Scott, Env. Health wrote:

>>>>

Thanks for the summary, Dianne. I have just a couple of points to add, summarized below:

\* There was mention of a desire to also search for an off-site well referred to as □Hacienda B.P.□ (I think that is the designation)

\* I see a mention in my notes about a request for a survey point in the Mocho canal to understand if it gains or loses

That□s it!

Scott

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

**From:** Diane Lundquist [mailto:dlundquist@cambria-env.com]

**Sent:** Friday, June 07, 2002 4:11 PM

**To:** sseery@co.alameda.ca.us; mkaten@zone7water.com; cmorf@zone7water.com

**Cc:** kepetryna@equiva.com

**Subject:** Shell Site - 3790 Hopyard Road, Pleasanton

2/7/2003



**Seery, Scott, Env. Health**

---

**From:** Seery, Scott, Env. Health  
**Sent:** Monday, June 10, 2002 12:00 PM  
**To:** 'Diane Lundquist'; mkaten@zone7water.com; cmorf@zone7water.com  
**Cc:** kepetryna@equiva.com  
**Subject:** RE: Shell Site - 3790 Hopyard Road, Pleasanton

Thanks for the summary, Dianne. I have just a couple of points to add, summarized below:

- There was mention of a desire to also search for an off-site well referred to as "Hacienda B.P." (I think that is the designation)
- I see a mention in my notes about a request for a survey point in the Mocho canal to understand if it gains or loses

That's it!

Scott

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

**From:** Diane Lundquist [mailto:dlundquist@cambria-env.com]  
**Sent:** Friday, June 07, 2002 4:11 PM  
**To:** sseery@co.alameda.ca.us; mkaten@zone7water.com; cmorf@zone7water.com  
**Cc:** kepetryna@equiva.com  
**Subject:** Shell Site - 3790 Hopyard Road, Pleasanton

The following is a summary of the meeting held among representatives of ACHCSA, Zone 7, Shell, and Cambria on May 23, 2002 regarding the Shell site at 3790 Hopyard Road.

The Shell site is located in close proximity to several active Zone 7 production wells. Due to MTBE levels identified on the Shell site, parties agreed that a number of actions would be undertaken.

Attempt to locate well 3S/1E-7Q1

This is a "lost" 172-ft agricultural well located near the Shell site. Its screened interval and seal construction are unknown. It has not been located since 1966. Shell is currently attempting to locate the well based on survey coordinates provided by Zone 7, (which we understand are rough). We will also review historic aerial photos to attempt to locate this well. If the well is located, Shell will properly abandon it to remove the potential vertical conduit.

Site Investigation

Shell will prepare a work plan to perform site investigation to establish a network of sentry wells to protect the municipal wells. We will submit this work plan for review by June 14, 2002.

Site Remediation

Shell will prepare a corrective action plan to address elevated levels of MTBE identified onsite. This corrective action plan will be prepared when site investigation activities are completed. In the interim, twice-monthly mobile groundwater extraction events will continue.

Conduit Study

Shell is currently having sanitary sewer locations surveyed and mapped to complete the conduit study. This will be presented as an addendum when complete.

Please let me know if you have any comments or additions to this summary.

**Seery, Scott, Env. Health**

---

**From:** Diane Lundquist [dlundquist@cambria-env.com]  
**Sent:** Friday, June 07, 2002 4:11 PM  
**To:** sseery@co.alameda.ca.us; mkaten@zone7water.com; cmorf@zone7water.com  
**Cc:** kepetryna@equiva.com  
**Subject:** Shell Site - 3790 Hopyard Road, Pleasanton

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Shell Station  
3790 Heyward Rd  
Pleasanton

5-15-02

memo to K6:

I met yesterday with Matt Kater and Colleen Mont of Zone 7 Water Agency. We discussed the history and nature of this case, and in particular the "missing" deep irrigation well located on the subject property, as well as the appropriate placement and construction of sentinel wells in locations off site.

We plan to arrange a meeting w/ Shell/Equilon to scope out these tasks.

SOS

**Seery, Scott, Env. Health**

**From:** Colleen Morf [cmorf@zone7water.com]  
**Sent:** Tuesday, May 14, 2002 6:53 PM  
**To:** Scott Seery (E-mail)  
**Cc:** Matt Katen  
**Subject:** Well Survey

Hi Scott,  
I was nice to meet you in person.

I have made some progress on the well survey. The abandoned well, 3S/1E 7Q 1, was last sampled for water quality on 10/11/60. The last water level measurement we collected was on 11/1/67. The well was reported as buried on 12/6/67. I have a well data report that I'm going to send to you via QIC. It doesn't have the best map and the description references Hwy 50 so I'm not sure how helpful it will be. It does have distances from Hopyard and from the canal.

On the first well survey from 1988, well number 2, 3S/1E 18A2, was Zone 7's Hopyard 2 muni well. It was actually drilled in 1943 to 233 feet and destroyed in 1983. This well was located near the NE corner of Hopyard Road and Pleasanton Canal.

Well number 3 from the 1988 well survey, 3S/1E 18A 4, was a test hole for the Pleasanton 7 well. The test hole was drilled in 1967 to 750 feet and has been destroyed.

Well number 4, 3S/1E 18A5, is Pleasanton 7. The well was completed in 1967 to 440 feet. It is still inactive.

Item 1 on the 2002 well survey, 3S/1E-72, is actually 3S/1E 18A 1 (Hopyard 1). The first number was from an old numbering system. The well was installed in Oct. 1943 to a depth of 387 ft. The well has been destroyed. Item 2, 3S/1E-71 is actually 3S/1E 7R 2 (Hopyard 3). The well was completed on the date and depth indicated on the table. The screened intervals were 95-103;106-120;139-147;166-183. The well was destroyed in 1983. The well had been located NE of Hopyard Road, SE of the Mocho Bridge. For item number 5 on the 2002 survey, the installation date was Feb. 1987 and the depth is 500. This is our Hopyard 6 well. This should cover all the discrepancies. Let me know if you need any more information.

Colleen

Colleen V. Morf  
Hydrogeologist  
Zone 7 Water Agency  
5997 Parkside Drive  
Pleasanton, CA 94588-5127  
(925)484-2600 x258

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



September 14, 2000

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

STID 1673

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

RE: Shell Station, 3790 Hopyard Road, Pleasanton

Dear Ms. Petryna:

This letter is sent in follow-up to review of the recent annual sampling report for the subject Shell site. Laboratory data for ground water samples show a marked increase in methyl tert butyl ether (MtBE) concentrations, among other fuel components, when compared to previous sampling events.

MtBE was identified during the June 2000 sampling event at concentrations of up to 13,500 ug/l in well S-2 (confirmed at 9850 ug/l using EPA Method 8260), and up to 12,200 ug/l in well S-4. During the previous sampling event (June 1999), MtBE concentrations were identified at 147 and 1780 ug/l, respectively. This marks the second time since 1997 that MtBE spikes have been identified in well S-4. This is the first time such spikes have been identified in well S-2. Other wells associated with this investigation (e.g., S-6) have also shown increases in MtBE since June 1999.

These data appear to demonstrate that a subsequent release of gasoline from the underground storage tank (UST) system has occurred at this site. Consequently, Equiva is required at this time to reinstate quarterly sampling and monitoring at this site. This revised schedule is to be implemented during the 4<sup>th</sup> quarter 2000 and continued until notified otherwise.

Please be advised that the Livermore-Pleasanton Fire Department (L-PFD), the local UST permitting agency, has been advised of this development. The L-PFD may require that some additional steps be taken by Equiva to further evaluate the current operation of the USTs in compliance with your permit.

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

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

Ms. Petryna  
Re: Shell Station, 3790 Hopyard Rd., Pleasanton  
September 14, 2000  
Page 2 of 2

c: Tom Peacock, ACDEH  
Chuck Headlee, RWQCB  
Matt Katen, Zone 7 Water Agency  
Steve Cusenza, Pleasanton Public Works Agency  
Stephen Bork, Cambria Environmental Technology, Inc.  
1144 - 65<sup>th</sup> St., Ste. B, Oakland, CA 94608

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



September 13, 2000

STID 1673

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

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, 3790 Hopyard Road, Pleasanton

Dear Ms. Stefani:

This letter is sent in follow-up to review of the recent annual sampling report for the subject Shell site. Laboratory data for ground water samples show a marked increase in methyl tert butyl ether (MtBE) concentrations when compared to previous sampling events.

MtBE was identified during the June 2000 sampling event at concentrations of up to 13,500 ug/l in well S-2 (confirmed at 9850 ug/l using EPA Method 8260), and up to 12,200 ug/l in well S-4. During the previous sampling event (June 1999), MtBE concentrations were identified at 147 and 1780 ug/l, respectively. This marks the second time since 1997 that MtBE spikes have been identified in well S-4. This is the first time such spikes have been identified in well S-2.

These data appear to demonstrate that a subsequent release from the underground storage tank (UST) system has occurred at this site. This is being brought to your attention as a courtesy in order to assist the city in its role to ensure UST compliance and operator adherence to requirements of the UST permit. At this time, Equiva will be required to reinstate quarterly sampling and monitoring at this site.

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

Sincerely,



Scott O. Seery, CHMM  
Hazardous Materials Specialist

c: Tom Peacock, ACDEH  
Chuck Headlee, RWQCB  
Matt Katen, Zone 7 Water Agency  
Steve Cusenza, Pleasanton Public Works Agency  
Karen Petryna, Equiva Services LLC, P.O. Box 6249, Carson, CA 90749-6249



# C A M B R I A

November 23, 1999

Mr. Tom Berkins  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway, 2nd Floor  
Alameda, California 94502

**Re: Certified List of Record Fee Title Owners for:**  
Shell-branded Service Station  
3790 Hopyard Rd.  
Pleasanton, CA  
Incident No. 98995842



Dear Mr. Berkins:

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

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

Sincerely,

Ailsa S. Le May, R.G.  
Senior Geologist

cc: Karen Petryna, Equiva Services LLC, P.O. Box 6249, Carson, California, 90749-6249  
Mr. Bill Stiles, 516 McGrath Court, Pleasant Hill, CA 94523  
Steven Hill, RWQCB - SFBR, 1515 Clay St., Ste. 1400, Oakland, CA 94612  
Ted Klenk, Pleasanton Fire Dept., 4444 Railroad St., Pleasanton, CA 94566

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

**Cambria  
Environmental  
Technology, Inc.**

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

May 5, 1999

STID 1673

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

RE: Shell Service Station, 3790 Hopyard Road, 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: 3790 Hopyard Road, Pleasanton

May 5, 1999

Page 2 of 2

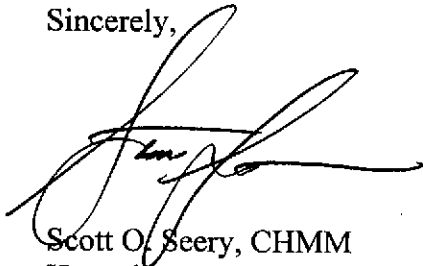
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

---

Name of local agency  
Street address  
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(Note: Fill out item 1 if there are multiple site landowners. 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 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:
  
2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

---

Name of local agency  
Street address  
City

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY  
FOR *(Site Name and Address)*

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, *(name of primary responsible party)*, certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners

**SHELL OIL PRODUCTS COMPANY**  
**CALIFORNIA WATER QUARTERLY REPORT**  
**CALIFORNIA REGIONAL WATER QUALITY CONTROL**  
**SAN FRANCISCO BAY REGION**

Fourth Quarter 1997

**WIC# 204-6138-0501**  
**3790 Hopyard Rd.**  
**City of Pleasanton**  
**County of Alameda**

---

**Remedial Action Status:**

No remedial action is anticipated at this site.

**Actions planned next 3 months:**

This site is currently monitored annually in the fourth quarter.

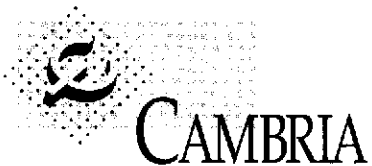
Soil Contamination Defined?	Yes
Soil Cleanup in Progress?	No
Free Product Plume Defined?	NA
Free Product Cleanup in Progress?	NA
Dissolved Constituent Plume Defined?	Yes

Contractor: **Cambria Environmental Technology, Inc.**

---

NA = Not applicable.

12/30/97



# 1673  
(SOS)

CALIFORNIA REGIONAL  
PROTECTION  
97 DEC -3 PM 3:46

**SHELL OIL PRODUCTS COMPANY**  
**CALIFORNIA WATER QUARTERLY REPORT**  
**CALIFORNIA REGIONAL WATER QUALITY CONTROL**  
**SAN FRANCISCO BAY REGION**

Third Quarter 1997

**WIC# 204-6138-0501**  
**3780 Hopyard Rd.**  
**City of Pleasanton 94566**  
**County of Alameda**

**Remedial Action Status:**

No remedial action is anticipated at this site.

**Actions planned next 3 months:**

This site is currently monitored annually in the second quarter.

Soil Contamination Defined?	Yes
Soil Cleanup in Progress?	No
Free Product Plume Defined?	NA
Free Product Cleanup in Progress?	NA
Dissolved Constituent Plume Defined?	Yes

**Consultant: Cambria Environmental Technology, Inc.**

NA = Not applicable: no groundwater monitoring wells exist on site.

12/1/97

CAMBRIA  
ENVIRONMENTAL  
TECHNOLOGY, INC.  
1144 65TH STREET,  
SUITE B  
OAKLAND,  
CA 94608  
PH: (510) 420-0700  
FAX: (510) 420-9170



**Ca/EPA**

**State Water  
Resources  
Control Board**

**Division of  
Clean Water  
Programs**

Mailing Address:  
P.O. Box 944212  
Sacramento, CA  
94244-2120

2014 T Street,  
Suite 130  
Sacramento, CA  
95814  
(916) 227-4307  
FAX (916) 227-4530

World Wide Web:  
<http://www.swrcb.ca.gov/~cwphome/fundhome.htm>

STID # 1673

SAS



Pete Wilson  
Governor

ENVIRONMENTAL  
PROTECTION

97 MAR 31 PM 3:35

MAR 26 1997

P. PUGNALE  
SHELL OIL COMPANY  
P O BOX 25370  
SANTA ANA, CA 92799

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 005003, FOR  
SITE ADDRESS: 3790 HOPYARD RD, PLEASANTON

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$110,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

**It is very important that you read the terms and conditions in the LOC. The State Board will take steps to withdraw this LOC after 90 calendar days from the date of this letter unless you proceed with due diligence with your cleanup effort.**

NOTE: You must also submit your first reimbursement request for the costs that you reported to have incurred within 90 calendar days from the date of this letter or submit a written explanation as to the status of the cleanup and when a reimbursement request can be expected. Failure to submit a request or an approved explanation may result in the removal of committed funds. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is important that you make use of the funding that has been committed to your cleanup in a timely manner.

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call Steve Marquez, our engineer assigned to claims in your Region, at (916) 227-0746. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.



Recycled Paper

*Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.*



MAR 26 1997


The following documents needed to submit your reimbursement request are enclosed:

- "Reimbursement Request Instructions" package. **Retain this package for future reimbursement requests.** These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are samples of completed reimbursement request forms and spreadsheets.
- "Bid Summary Sheet" to list information on bids received which **must be completed and returned.**
- "Certification of Non-Recovery From Other Sources" which **must be returned before any reimbursements can be made.**
- "Reimbursement Request" forms which you **must use to request reimbursement of costs incurred.**
- "Spreadsheet" forms which you **must use in conjunction with your reimbursement request.**
- "Claimant Data Record" (Std. Form 204) which **must be completed and returned with your first reimbursement request.**

We continuously review the status of all active claims. If you do not submit a reimbursement request or fail to proceed with due diligence with the cleanup, we will take steps to withdraw your LOC.

If you have any questions regarding the enclosed documents, please contact Cheryl Gordon at (916) 227-4539.

Sincerely,

  
Dave Deaner, Manager for  
UST Cleanup Fund Program

Enclosures

cc: Mr. Steve Morse  
RWQCB, Region 2  
2101 Webster St., Ste. 500  
Oakland, CA 94612

Mr. Thomas Peacock  
Alameda County EHD  
1131 Harbor Bay Pkway, 2nd Fl.  
Alameda, CA 94502-6577



LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 005003

AMENDMENT NO: 0

CLAIMANT: SHELL OIL COMPANY

BALANCE FORWARD: \$0

CO-PAYEE: NONE

THIS AMOUNT: \$110,000

JOINT CLAIMANT: NONE

NEW BALANCE: \$110,000

ATTN: P. PUGNALE  
CLAIMANT ADDRESS: P O BOX 25370  
SANTA ANA, CA 92799

TAX ID/SSA NO: 13-1299891

Subject to availability of funds, the State Water Resources Control Board (SWRCB) agrees to reimburse SHELL OIL COMPANY (Claimant) for eligible corrective action costs at SHELL SERVICE STATION 3790 HOPYARD RD, PLEASANTON, CA 94569 (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$110,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the SWRCB, the SWRCB shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the SWRCB. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the SWRCB's consent.
8. This Letter of Commitment may be withdrawn at any time by the SWRCB if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the SWRCB this 5th day of March, 1997.

STATE WATER RESOURCES CONTROL BOARD

BY *Douglas*  
Manager, Underground Storage Tank Cleanup Fund Program

BY *Susan Horn*  
Chief, Division Administrative Services

STATE USE:  
CALSTARS CODING:  
0550 - 569.02 - 30530

\$ \_\_\_\_\_

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

Alameda County CC4586  
Environmental Protection Division  
1131 Harbor Bay Parkway, Room 250  
Alameda CA 94502-6577

July 31, 1996

STID 1673

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

RE: SHELL SERVICE STATION, 3790 HOPYARD ROAD, PLEASANTON

Dear Mr. Granberry:

This letter is in follow-up to our meeting July 26, 1996. You may recall that we discussed historic ground water (GW) analytical results generated since 1991.

In particular, tabulated sampling data report a significant reduction in fuel compound concentrations in water sampled from well S-5 between March 1991 and February 1993, including a two order-of-magnitude drop in benzene, among other target compounds, in a ~2 month period (December 1992 to February 1993). None of the pre-December 1993 ground water elevation data have been incorporated into data tables presented in those reports presented since, making attempts to interpret possible correlations between chemical concentrations and GW fluctuations difficult. Understanding GW hydrology will assist in evaluating possible exposure risks to nearby receptors (e.g., 7-11 employees, etc.) on the adjoining, downgradient site.

As was agreed, please present an evaluation and interpretation of historic GW data and hydrology. Although current data would suggest exposure risk is minimal to nearby potential receptors, please expand your evaluation to include a discussion regarding this topic as well. This additional task should evaluate the current well coverage and its ability to provide the information necessary to make such a risk determination.

Please submit the requested evaluation before the end of 1996.

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

Sincerely,



Scott O. Seery, CHMM  
Senior Hazardous Materials Specialist

Mr. Granberry  
RE: Shell Station, 3790 Hopyard Road  
July 31, 1996  
Page 2 of 2

cc: Mee Ling Tung, Agency Director  
Gil Jensen, Alameda County District Attorney's Office  
Kevin Graves, RWQCB  
William Halvorsen, Pleasanton Fire Department

STATE OF CALIFORNIA - CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF CLEAN WATER PROGRAMS

2014 T STREET, SUITE 130

P.O. BOX 944212

SACRAMENTO, CALIFORNIA 94244-2120



FAX TRANSMITTAL

DATE: 2-2-96

TO: Tom Peacock

FAX #: (510) 337-9335

FROM: Cheryl Gordon

UST CLEANUP FUND PROGRAM

FAX #: (916)-227-4530

PHONE #: (916) 227-4539



NUMBER OF PAGES (including this page): \_\_\_\_\_

- For your information
- Per your request
- For your review and comment

Tom, as per my phone message, please sign the attached corrective action chronology for Shell Oil in Pleasanton. I have discussed the site with Scott Seery and it is o.k. Thank You. Please fax it back to me after you sign it.

(Revised 7/94)

CLAIM NO. 5003

LOCAL AGENCY NO.

SITE ADDRESS 3790 Hopyard Rd., Pleasanton, CA 94569

CORRECTIVE ACTION COMPLIANCE DOCUMENTATION

PAGE 3

DATE	ACTION REQUIRED/RESPONSE
4-21-88	Ltr from FD to Shell Oil - because of significant leak at this site, must submit submit closure plan by 7/15/88.
2/16/92	Fuel spill when customer drove off w/ fueling nozzle still in the vehicle. Emergency response unit was at the site.
5/8/92	Quarterly GW monitoring rept submitted by Geo Strategies.
8/7/92	" " " " " " " "
11/6/92	" " " " " " " "
2/8/93	" " " " " " " "
5/7/93	" " " " " " " "
10/30/93	" " " " " " " "
9/9/93	Ltr from Hydro Environmental Tech - requesting to eliminate 4 MW's.
9/22/93	Quarterly GW sampling conducted in July '93 submitted by Geo Strategies.
9/13/93	Ltr from Hydro - withdrawing earlier request to eliminate MW's.
2/1/96	Per telephone call from Scott Seery with Alameda County: Claimant has been doing qtrly monitoring from 1983 through 1995. In 7/93, site renovation took place and they re-piped some areas and removed me of the dispenser islands. During the process, contaminated soil was excavated 7 1/2' below grade. Approx 25 cu. yds of soil removed. 11/93 - the Dept. allowed a reduction in well sampling from 12 to 8. In 1995, Shell self-appointed themselves to do annual sampling. County will be meeting w/claimant 2/96 to discuss site.

CONFIRMATION OF CORRECTIVE ACTION COMPLIANCE

After reviewing the lead agency site file, the claim reviewer has determined that the claimant is in substantial compliance with corrective action requirements.

Cheryl Dordon

2/2/96

REVIEWER'S SIGNATURE

DATE SIGNED

LEAD AGENCY CONCURRENCE:

As of this date, the lead agency representative concurs with the determination that the claimant is in compliance with applicable corrective action requirements.

Drews Beach

2-5-96

SIGNATURE

DATE SIGNED

STAFF RECOMMENDATION: ( ) APPROVED

( ) REFERRED TO TEAM LEADER - See Comments, Page 2.

REVIEWER'S SIGNATURE:

DATE SIGNED

revised 10/92

01-1362

## STATE WATER RESOURCES CONTROL BOARD

DIVISION OF CLEAN WATER PROGRAMS

2014 T STREET, SUITE 130

P.O. BOX 944212

SACRAMENTO, CALIFORNIA 94244-2120

916/227-4532

FAX 227-4530



July 6, 1994

Mr. Bill Halvorson  
Batallion Chief  
Pleasanton Fire Dept.  
P.O. Box 520  
Pleasanton, CA 94566-0802

I am asking for your assistance in sending out "90 day compliance letters" for a contaminated UST site under your jurisdiction that appears to have stopped remediation procedures. The claimant's name and site address is:

Shell Oil Co.  
3790 Hopyard Rd.  
Pleasanton  
(Mailing Address: P.O. Box 4848  
Anaheim, CA 92803, ATTN: P. Pugnale)  
Claim No. 5003

As the claimant does not appear to be in corrective action compliance, this will require that your office send him a "90-day compliance letter". I have enclosed, for your reference, copies of the UST Cleanup Fund's initial correspondence sent to all local regulatory agencies on October 2, 1992, regarding the procedures and basic format for the letter. The 90-day letter format may be modified to fit your requirements. I have also enclosed a copy of a letter initiated by our Region 2, which is a good sample of a 90-day letter. When you send the 90-day letter, please send me a copy for our file.

I would appreciate your sending this letter to the claimants as soon as possible, but within 30 days. If you have any questions regarding this process, please call me at 916/227-4532. Thanks for your help.

Sincerely,

Donna L. Turcotte, Review Analyst  
Underground Storage Tank  
Cleanup Fund

Enclosures (2)

cc: ✓ Mr. Steve Morse  
California Regional Water Quality  
Control Board, San Francisco Bay Region  
2101 Webster Street, Suite 500  
Oakland, CA 94612



112-112  
112-112

# CITY OF PLEASANTON

P.O. BOX 520 • PLEASANTON, CALIFORNIA 94566-0802

CITY OFFICES  
123 MAIN STREET

CITY COUNCIL  
484-8001

CITY MANAGER  
484-8008

CITY ATTORNEY  
484-8003

CITY CLERK  
484-8235

FINANCE  
484-8033

PERSONNEL  
484-8012

CITY OFFICES  
200 OLD BERNAL AVE.

PLANNING  
484-8023

ENGINEERING  
484-8041

BUILDING INSPECTION  
484-8015

COMMUNITY SERVICES  
484-8160

WATER - BILLING  
484-8038

FIELD SERVICES  
3333 BUSCH ROAD

PARKS  
484-8056

SANITARY SEWER  
484-8061

STREET  
484-8066

SUPPORT SERVICES  
484-8067

WATER  
484-8071

FIRE  
4444 RAILROAD AVE.  
484-8114

POLICE  
4833 BERNAL AVE.  
P.O. BOX 909  
484-8127

November 8, 1993

Hydro Environmental Technologies, Inc.

Attn: Markus Niebanck

2363 Mariner Square Drive, Suite 243

Alameda, CA 94501

RE: ~~2363~~ Hopyard Rd. - Shell Station

Dear Mr. Niebanck:

Based on the documentation accompanying your letter of November 2, 1993, I concur that continued monitoring of wells S-3, S-7, S-8 and S-10 may be eliminated from the quarterly monitoring program. While not specifically mentioned in your letter, the designated wells will need to be maintained and secured until final closure.

Sincerely,

Theodore R. Klenk  
Pleasanton Fire Marshal



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**  
SAN FRANCISCO BAY REGION  
1111 JACKSON STREET, ROOM 6040  
OAKLAND 94607

Phone: Area Code 415  
464-1255



June 28, 1988 (LHM)

Mr. Stan Roller  
Shell Oil Co.  
P.O. Box 4023  
Concord, CA 94524

RE: Shell Service Station; Hopyard and Los Positas, Pleasanton

Dear Mr. Roller,

My staff has reviewed the reports submitted for the above referenced site. These reports indicate that fuel constituents are present in the soil and ground water beneath this site. The investigative work to date has not adequately defined the extent of the soil contamination nor the horizontal and vertical extent of the ground water pollution plume. Therefore, pursuant to Section 13267(b) of the California Water Code, I request that you submit a report that includes the results of the following work:

1. DETERMINATION OF THE EXTENT AND MAGNITUDE OF SOIL CONTAMINATION.
  - A. Soil sample analyses indicate soil contamination at depths of 19 to 20.5 feet in S-5. Additional borings and sampling are required to define the horizontal and vertical extent and the magnitude of soil contamination.
2. DEFINITION OF THE HORIZONTAL AND VERTICAL EXTENT OF THE GROUND WATER POLLUTION PLUME, BOTH ON- AND OFF-SITE.
  - A. Ground water sample analyses indicate that the pollution plume in the uppermost clay layer has migrated to the downgradient edge of the property. Additional monitoring wells, both on and off-site, are required to define the extent of the pollution plume in and beyond the clay zone.

JUL 6 1988

Construction of monitoring and extraction wells should be consistent with the guidelines of the RWQCB. Filter pack and slot sizes for all wells should be based on particle analysis (ASTM D-422) from each stratigraphic unit in at least one boring on the site. All wells should be surveyed to mean sea level (MSL).

- C. Monitoring wells should be sampled for free product and dissolved constituents monthly until a remediation plan is underway. It may be appropriate to sample more or less frequently following the initiation of ground water remediation. In no case should the monitoring frequency be less than quarterly. The samples should be analyzed for the appropriate constituents as listed in Attachment 1.

### 3. INTERPRETATION OF HYDROGEOLOGIC DATA.

- A. Water levels should be monitored in all wells on site according to the constituent sampling schedule discussed above. Water level records, contour maps, and gradient determination should be submitted with other sampling results.
- B. The geologic characteristics of the aquifer have not been adequately described. Borings drilled in the vicinity of the site suggest that there is a more permeable, water transmitting strata underlying the polluted clay layer. Additional borings are required to determine the depth and vertical extent of the aquifer immediately underlying the clay. Geologic cross-sections should be prepared. A list of information required on cross-sections is enclosed (Attachment 2). The cross-sections should be interpreted to explain pollution migration patterns, specifically the effect of the pollution on this lower, undefined aquifer.

### 4. DETERMINATION OF THE POTENTIAL SHORT- AND LONG-TERM IMPACTS OF THE POLLUTION PLUME ON THE BENEFICIAL USES OF GROUND AND SURFACE WATER IN THE AREA.

- A. The local ground water provides a critical drinking water source. Therefore, the potential impacts of this site's pollution on the ground water must be addressed.
- B. The protection of other beneficial uses has not been addressed. Examples of beneficial uses include ground water recharge, fresh water habitat, and fish migration. Identification of additional beneficial uses which might be impacted by this site is necessary. Evaluation of the actual or potential short-and long-term impacts of this site on these beneficial uses is also required.

### 5. DEVELOPMENT OF A REMEDIATION PLAN.

- A. In addition to the above investigative work, a remediation plan for the site should be developed. This plan should include a time schedule and must address at least the following issues:
  - i. All free product must be removed by an appropriate remediation system. Dissolved constituents and contaminated soils must be remediated such that beneficial uses of the ground and surface water

are restored and/or protected as required by the policy on "maintaining high quality of waters in California" (Attachment 3).

- ii. The design of remedial action systems should be based on appropriate review of hydrogeologic and water quality data. Pump test data should be used to determine aquifer characteristics and the capture zone(s) of extraction system(s). Manual bailing of fuel product is not acceptable as a recovery system. The overall effectiveness of the remedial program should be verified by an appropriate monitoring program.

At the present time, Regional Board staff are handling higher priority cases and projects. Therefore, only limited review of this case will be feasible in the near future. Staff will be able to provide general guidance on the direction and objectives of required investigation and clean-up, but not specific guidance on this case. However, you are nonetheless responsible for diligent actions to protect waters of the State.

A plan including a time schedule for performing the above investigative actions (items 1-4) and for developing a remediation plan (item 5) should be submitted within thirty days from the date of this letter. A report which contains the results of the above investigative actions (items 1-4) should be submitted no later than 90 days from the date of this letter. Implementation of remedial plans for polluted soils, free product, and dissolved constituents may be appropriate prior to full definition of the extent of pollution. If remedial action is to be postponed pending further investigation, a rationale for this proposal should be included. Status reports on the investigation and clean-up should be submitted quarterly (beginning in October, 1988) unless results indicate that a significant change or water quality impact has occurred. A copy of each report should be forwarded to the Alameda County Flood Control and Conservation District (attn:Craig Mayfield) at 5997 Parkside Drive, Pleasanton, CA, 94566; and to the City of Pleasanton Water Laboratory (attn:Jerry Taylor) at P.O. Box 520, Pleasanton, CA, 94566-0802.

If you have any questions please contact Lisa McCann of my staff at 415-464-1036.

Sincerely,



Steven R. Ritchie  
Executive Officer

Enclosures

cc w/o Enclosures: Craig Mayfield  
Alameda Co. Flood Control and Water  
Conservation District

Jerry Taylor  
City of Pleasanton Water Laboratory

Rick Mueller  
City of Pleasanton Fire Department

Christa Lopez  
Gettler-Ryan, Inc.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION  
1111 JACKSON STREET, ROOM 6040  
OAKLAND 94607

Phone: Area Code 415  
464-1255



June 27, 1988 (LHM)

Mr. Stan Roller  
Shell Oil Co.  
P.O. Box 4023  
Concord, CA 94524

RE: Shell Service Station; Hopyard and Los Positas, Pleasanton

Dear Mr. Roller,

My staff has reviewed the reports submitted for the above referenced site. These reports indicate that fuel constituents are present in the soil and ground water beneath this site. The investigative work to date has not adequately defined the extent of the soil contamination nor the horizontal and vertical extent of the ground water pollution plume. Therefore, pursuant to Section 13267(b) of the California Water Code, I request that you submit a report that includes the results of the following work:

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  - B. Construction of monitoring and extraction wells should be consistent with the guidelines of the RWQCB. Filter pack and slot sizes for all wells should be based on particle analysis (ASTM D-422) from each stratigraphic unit in at least one boring on the site. All wells should be surveyed to mean sea level (MSL).
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less frequently following the initiation of ground water remediation. In no case should the monitoring frequency be less than quarterly. The samples should be analyzed for the appropriate constituents as listed in Attachment 1.

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If you have any questions please contact Greg Zentner of my staff at 415-464-0840.

Sincerely,

Steven R. Ritchie  
Executive Officer

Enclosures

cc w/o Enclosures: Craig Mayfield  
Alameda Co. Flood Control and Water  
Conservation District

Jerry Taylor  
City of Pleasanton Water Laboratory

April 21 , 1988

Mr. Stan Roller  
Shell Oil Company  
P.O. Box 4023  
Concord, Calif 94524

Re: Plan of Closure for Tanks and Piping at 3790 Hopyard Rd,  
Pleasanton, Calif

Dear Stan ,

I have just completed reading the most recent report on the 3790 Hopyard Rd groundwater contamination investigation. Upon close examination of all of the information your report presented, I believe the levels of contamination discovered at the 3790 Hopyard Rd site exceed acceptable limits for accurate monitoring of existing tanks/product lines by the aspirated vadose system recently installed .

Referencing your report of January 25,1988, a level of 1800 ppm gasoline was found in sample ST-2, which is one of your vadose monitoring wells. Since vadose wells require a clean background to function correctly, I also find this result to be unacceptable to permit monitoring of existing systems to continue.

By all the results you have presented , I believe that a leak of significant magnitude appears to have occurred at 3790 Hopyard Rd sometime in the past.

In light of these facts, and that Zone 7's well is in close proximity to your Station at 3790 Hopyard Rd, I am directing Shell to prepare a plan of closure for all existing underground tanks and piping on this site. The closure timetable is as follows :



1. On or before June 15th, 1988, an acceptable closure plan will be **filed and approved** for removal of all existing underground tanks and product lines at 3790 Hopyard Rd.

2. Closure will begin no later than July 15th, 1988 or a maximum of 30 days from closure plan approval, whichever is less. Beginning closure means that demolition of existing tanks and lines must begin no later than 8:00 am 30 days following closure plan approval or on July 15th, 1988, assuming an approved closure plan has been filed, and a permit for tank excavation has been issued by the Pleasanton Fire Dept.

3. Failure to comply with the above stated timetable will result in all actions allowed by law to gain compliance, including the possible referral of this case to the Alameda County District Attorney's Office for enforcement.

For your information, a set of closure plan forms and guidelines have been included with this letter to expedite the closure process.

Sincerely,

---

Rick Mueller  
City of Pleasanton Fire Dept  
Chemical Specialist

cc: City Attorney's Office  
Greg Zentner, Regional Water Board  
Chief Hill, Pleasanton Fire Dept

Shell Oil Company



EAST BAY  
MARKETING DISTRICT

P.O. Box 4023  
Concord, CA 94524  
(415) 676-1414

March 25, 1988

Mr. Greg Zentner  
Regional Water Quality Control Board  
San Francisco Bay Region  
1111 Jackson Street, Room 6040  
Oakland, California

SUBJECT: SHELL SERVICE STATION  
3790 HOPYARD ROAD & LAS POSITAS  
PLEASANTON, CALIFORNIA

Dear Mr. Zentner:

Enclosed is a copy of the report issued by Pacific Environmental Group, Inc., dated March 10 1988, which documents the findings of a soil and groundwater investigation conducted at the subject location. Based upon the information provided in this report, we feel that the Arroyo Mocho Canal will act as a hydraulic barrier between the subject site and the water-supply wells located to the southeast.

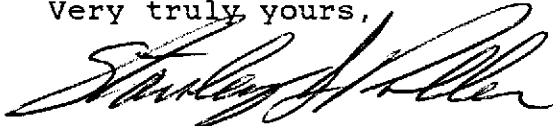
As such, Shell Oil Company proposes the following course of action in respect to the subject site.

- Install one additional groundwater monitoring well between the subject site and Arroyo Mocho Canal to obtain additional information about the downgradient water quality.
- Initiate a quarterly groundwater sampling and analysis program for all project wells.
- Submit semi-annual reports to include any analytical results and updated groundwater contour maps.
- After a 1 year period from the initiation of this program, review all available data pertaining to this project and modify the above program if warranted.

CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
MAR 30 1988  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
MAR 30 1988

If you have any questions, please call me at (415) 676-1414  
ext. 127

Very truly yours,



Stanley J. Roller

SJR/jpw

enclosure

cc: Mr. J. Ryan, Gettler-Ryan Inc.  
Mr. R. Mueller, Pleasanton Fire Department  
Mr. B. Wilkins, City of Pleasanton  
Mr. C. Mayfield, ACFCWCD



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT  
5997 PARKSIDE DRIVE    PLEASANTON, CALIFORNIA 94566    (415) 484-2600

January 25, 1988

CERTIFIED MAIL

Mr. Stanley J. Roller  
Area Environmental Engineer  
Shell Oil Company  
P.O. Box 4023  
Concord, CA 94520

Subject: Shell Service Station  
Hopyard Road at West Las Positas, Pleasanton

Dear Mr. Roller:

In a recent letter to Rick Mueller of the Pleasanton Fire Department, you transmitted the results of a soil and groundwater investigation by Pacific Environmental Group, Inc., at the location referenced above.

This report made it clear that gasoline has leaked into the soil and localized groundwater from the subsurface gasoline storage system. Both Zone 7 and the City of Pleasanton have municipal wells nearby that could potentially become contaminated by this leak. We have tested our wells for purgeable halocarbons (EPA Method 601) and purgeable aromatics (EPA Method 602), and no detectable levels of any of the compounds have been discovered. However, unless there is remedial action by Shell Oil Company, the potential still exists for contamination of the municipal wells.

We are very concerned about this situation and therefore request that Shell Oil Company complete any necessary remedial action as soon as possible. Please advise us as to your schedule for this action. Please feel free to call me with any comments or questions that you may have on this matter.

Very truly yours,

Mun J. Mar  
General Manager

By   
James P. Horen, Chief  
Water Systems Engineering

JPH:bkm

cc: Harris Teshima, Zone 7  
J. Killingstad, Zone 7  
Mitch Baker, Zone 7  
Pierre Petrovitch, Zone 7  
Bill Wilkins, City of Pleasanton  
Rick Mueller, City of Pleasanton  
Greg Zentner, Regional Water Quality Control Board

Possible Unauthorized Discharge  
Report

1987?

Location: Hacienda shell  
3790 Hopyard Rd

Information source: Zone 7 Water District  
Craig Mayfield  
484-2600

Leak Source: Monitoring well installed  
approx 1/86 between Regular  
Leaded & Super Unleaded Tanks.  
Gasoline smelled in Water Sample.

---

Week of July 3<sup>rd</sup>, Zone 7  
Water District contacted my office to  
inquire about any information we  
might have re. a report of gasoline  
being smelled in a monitoring well  
installed at 3790 Hopyard Rd.

I was unaware of the situation or  
the presence of a monitoring well at  
this site. Told Zone 7 I would  
investigate.

On July 9 I did a brief inspection of the station, looking for monitoring wells. In the process I discovered a leaking "Red Jacket" pipeline leak detector. Informed Station employees of the situation. July 11 spoke with Station Manager Marilyn Burton re. situation. She said she would contact Shell & get fix initiated on "Red Jacket".

On July 14<sup>th</sup>, Marilyn called to let me know Central Petroleum was coming to fix the Red Jacket. I made inspection of the working being done. Central Petroleum made a 15 minute static test of line pressure to check to be sure no lines from Super Unleaded Tank were leaking - it was Super Unleaded Red Jacket that was leaking.

In the process of waiting for the static test to be finished, Central Petroleum employees assisted me in checking a water sample from Monitoring Well for product. Upon bringing up a sample for quick sniff test, a very distinct odor of gasoline was detected from the water.

Sample. Further investigation is needed  
at this time.

MEMORANDUM



**EMCON**  
ASSOCIATES

Consultants in Wastes  
Management and  
Environmental Control

RECEIVED

SEP 19 1986

September 18, 1986  
Project 800-02.02

GETTLER-RYAN INC.  
GENERAL CONTRACTORS

To: Gettler-Ryan Inc.  
1992 National Avenue  
Hayward, California 94545

Attn: Mr. Jeffrey M. Ryan

#9427

Job Copy

Re: Temporary Monitoring Well S-C at Shell Service Station, West Las  
Positas Boulevard, Pleasanton.

EMCON Associates conducted a soil and ground-water investigation at the Shell station located at West Las Positas Boulevard and Hopyard Road in Pleasanton on January 22, 1986. During that investigation, ground water stabilized at a depth of approximately 9 feet in Temporary Monitoring Well S-C. The well was constructed accordingly, with the bottom of the well at 12-1/2 feet. However, when the well was sampled on September 8, 1986, static water was measured at 10.40 feet. During sampling, the well was evacuated to dryness and did not recharge. On September 9, 1986, the well had still not recharged, and was recorded as a dry well. Additionally, the bottom of the well had silted up to a depth of 11.75 feet. EMCON believes that the drop in water level reflects a seasonal fluctuation in the ground-water table. Therefore, this well should have sufficient water to sample during the wet season. We have attached a copy of the Exploratory Boring Log and location map.

Susan Willhite

Headquarters:

1921 Ringwood Avenue, San Jose, California 95131, (408) 275-1444

Branch office: 445 W. Garfield Avenue, Glendale, California 91204