

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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January 18, 2008

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

Bhushan K. Bansal
Bansal, Inc.
1784 150th Avenue
San Leandro, CA 94578-1826

Subject: Fuel Leak Case No. RO0000367 and Geotracker Global ID T0600101230, Shell#13-6017, 1784 150th Avenue, San Leandro, CA 94578

Dear Mr. Brown and Mr. Bansal:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the documents entitled, "Supplemental Subsurface Investigation Report," dated December 17, 2007 and "Groundwater Monitoring and Remediation Report - Third Quarter 2007," dated November 9, 2007. Both reports were prepared on Shell's behalf by Conestoga-Rovers & Associates.

The Supplemental Subsurface Investigation Report presents results from five cone penetration test (CPT) borings, one direct push soil boring, and five soil vapor probes. Total petroleum hydrocarbons as gasoline (TPHg) were detected in soil vapor from three of the five soil vapor probes at concentrations that exceed Environmental Screening Levels (San Francisco Bay Regional Water Quality Control Board November 2007) for residential land use. TPHg, benzene, and MTBE were detected in grab groundwater samples collected from the CPT borings at concentrations up to 3,600, 41, and 1,100 micrograms per liter ($\mu\text{g/L}$), respectively. The Supplemental Subsurface Investigation Report recommends destruction and replacement of wells MW-1 and MW-2, installation of a shallow zone monitoring well near boring B-1, and re-sampling vapor probes SVP-1 through SVP-5. As discussed in the technical comments below, we generally concur with these recommendations.

Interim groundwater extraction was conducted periodically at the site from July 2002 to August 2007. Periodic groundwater extraction was discontinued at the site because periodic extraction was not effective in reducing the concentrations of dissolved hydrocarbons and oxygenates. ACEH concurred with discontinuation of periodic groundwater extraction on August 14, 2007. During the most recently reported groundwater sampling event on September 11, 2007, TPHg, benzene, and MTBE were detected in groundwater at concentrations up to 45,000, 8,100, and 5,700 $\mu\text{g/L}$, respectively. Remediation is required for this site in order to address the elevated concentrations of fuel hydrocarbons and oxygenates that persist in soil and groundwater at the site. We request that you submit a Pilot Test Work Plan or Draft Corrective Action Plan **by April 25, 2008**.

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

TECHNICAL COMMENTS

1. **Destruction and Replacement of Wells MW-1 and MW-2.** We concur with the proposed destruction and replacement of long screen wells MW-1 and MW-2. Please present plans for these activities in the Work Plan for Well Decommissioning and Well Installation requested below.
2. **Installation of Additional Monitoring Well near Boring B-1.** We have no objection to installation of an additional monitoring well to monitor shallow groundwater near boring B-1. Please present plans for well installation in the Work Plan for Well Decommissioning and Well Installation requested below.
3. **Re-Sampling of Soil Vapor Probes.** Based on the elevated concentrations of TPHg detected in soil vapor samples from probes SVP-1 through SVP-5, additional sampling of soil vapor probes SVP-1 through SVP-5 is required. Please present the results from re-sampling of the probes **no later than March 28, 2008.**
4. **TPHg Concentration in Soil Vapor from SVP-5.** We do not agree with the conclusion in the Executive Summary of the Supplemental Subsurface Investigation Report that the UST system at the site is not the likely source of the elevated concentration of TPHg detected in soil vapor from probe SVP-5. The Supplemental Subsurface Investigation Report postulates that an unknown source of petroleum contamination exists in the vadose zone in the area of MW-12. In reviewing historical data for the site, we find little indication of a separate source of contamination in this area. Five soil samples were collected on May 26, 2006 from soil boring SB-24, which is the soil boring associated with well MW-12. The highest concentration of TPHg (848 mg/kg) was detected in the soil sample collected from the capillary fringe at a depth of 24 feet bgs. Soil samples collected at shallower depths contained less than 2.39 mg/kg of TPHg. These results indicate that soil contamination in this off-site area is more likely the result of groundwater migration from the site. Elevated concentrations of BTEX were detected in soil vapor samples previously collected from locations SVS-7 through SVS-9 in the off-site area west of 150th Avenue. Soil vapor samples were collected from four depths in SVS-9. The highest concentrations of benzene were detected in the two lowermost soil vapor samples. These results are also consistent with contamination that has migrated with groundwater rather than a separate vadose zone source.
5. **Site Remediation.** Interim groundwater extraction has not reduced the concentrations of dissolved hydrocarbons at the site. Based on both historic and recent site assessment activities, a significant source of fuel hydrocarbons and oxygenates remains at the site. Therefore, we request that you submit a Pilot Test Work Plan or Draft Corrective Action Plan **by April 25, 2008** to initiate site cleanup.

TECHNICAL REPORT REQUEST

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

- **March 28, 2008** – Work Plan for Well Decommissioning and Well Installation and Sampling Results from Soil Vapor Probes SVP-1 through SVP-5
- **April 25, 2008** – Pilot Test Work Plan or Draft Corrective Action Plan
- **45 days after end of each quarter** – Quarterly Monitoring Reports

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).

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.

Denis Brown
Bhushan K. Bansal
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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

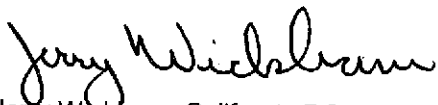
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Sincerely,



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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Peter Schaefer, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A
Emeryville, CA 94608

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
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