



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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FAX (510) 337-93

April 21, 2009

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, "*Soil Vapor Probe Sampling Report*," dated February 17, 2009, and "*Aquifer Pumping Test and Multi-Phase Extraction Pilot Test Report*," dated February 5, 2009. Both documents were prepared on Shell's behalf by Conestoga-Rovers & Associates.

The "*Soil Vapor Probe Sampling Report*," dated February 17, 2009, presents results from one round of soil vapor sampling conducted on January 17, 2009. Soil vapor samples were collected from three on-site and one off-site soil vapor probes.

The "*Aquifer Pumping Test and Multi-Phase Extraction Pilot Test Report*," dated February 5, 2009 presents results from an aquifer pumping and multi-phase extraction (MPE) pilot test conducted between November 5 and 19, 2008. The Pilot Test Report concludes that dissolved-phase migration can be controlled through groundwater extraction but DPE will not be an effective method for removing the hydrocarbon mass remaining in saturated soils in the source area. The results of the pilot test were also discussed during a meeting held on March 19, 2009 between Denis Brown of Shell Oil Products, Peter Schaefer of Conestoga-Rovers & Associates, Donna Drogos of ACEH, and Jerry Wickham of ACEH.

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

TECHNICAL COMMENTS

1. **Additional Soil Vapor Sampling.** We concur with the recommendation in the "*Soil Vapor Probe Sampling Report*," dated February 17, 2009, to collect an additional soil vapor sample from off-site probe SVP-5. We concur that additional sampling of soil vapor probes SVP-1 through SVP-4 is not required at this time. Please present the results from soil vapor sampling of probe SVP-5 in a separate report or in a quarterly groundwater monitoring report **no later than August 17, 2009.**

2. **Vertical Hydraulic Gradient.** The Pilot Test Report stated that there is an upward vertical gradient at the site. However, review of water levels from the four piezometer clusters installed in September 2008 indicates that the vertical hydraulic gradient appears to fluctuate between slightly upward to downward. During the most recent sampling event on December 19, 2008, water levels in the A zone piezometers were higher than water levels in the B-zone piezometers in three of the four piezometer clusters. Therefore, there is a potential for downward migration of contaminants, at least seasonally.
3. **Mass Removal Rates.** The Pilot Test Report concludes that vapor phase concentrations and mass removal rates dropped significantly during the test. In reviewing the pilot test data, we did not see a consistent decline in vapor concentrations or mass removal rates during the pilot test. Mass removal rates measured near the beginning and end of the test are shown below:

MPT Test	Mass Removal Rate at Start of Pilot Test	Mass Removal Rate at End of Pilot Test
EW-1	TPHg = 15.9 lbs/day Benzene = 0.005 lbs/day	TPHg = 15.1 lbs/day Benzene = 0.025 lbs/day
EW-2	TPHg = 10.3 lbs/day Benzene = 0.006 lbs/day	TPHg = 13.4 lbs/day Benzene = 0.028 lbs/day
Combined EW-1 and EW-2	TPHg = 32.8 lbs/day Benzene = 0.045 lbs/day	TPHg = 27.2 lbs/day Benzene = 0.087 lbs/day

4. **Feasibility Study.** The Pilot Test Report concludes that MPE will not be an effective method for removing the hydrocarbon mass remaining in saturated soils in the source area. We request that you prepare a Feasibility Study that reviews MPE along with additional remedial alternatives in a Feasibility Study. Please review the estimated mass removal rates in evaluating the feasibility of MPE for the site. In addition, please review the potential for air sparging to increase the rate of mass removal.

TECHNICAL REPORT REQUEST

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

- **July 20, 2009** – Feasibility Study Report
-
- **August 17, 2009** – Sampling Results from Soil Vapor Probe SVP-5
- **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

Denis Brown
Bhushan K. Bansal
RO0000367
April 21, 2009
Page 3

party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

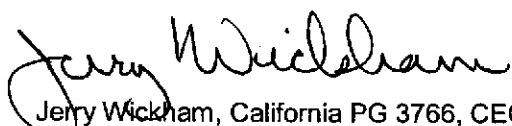
Denis Brown
Bhushan K. Bansal
RO0000367
April 21, 2009
Page 4

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

**Alameda County Environmental Cleanup
Oversight Programs
(LOP and SLIC)**

ISSUE DATE: July 5, 2005

REVISION DATE: December 16, 2005

PREVIOUS REVISIONS: October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted**.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

1) Obtain User Name and Password:

- a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
 - or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**

2) Upload Files to the ftp Site

- a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
- b) Click on File, then on Login As.
- c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
- d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
- e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs

- a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
- b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
- c) The subject line of the e-mail must start with the RO# followed by Report Upload. (e.g., Subject: RO1234 Report Upload)