



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-93

November 13, 2008

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

Mr. Frank Salel
Salel Enterprises
P.O. Box 5099
Oakland, CA 94605

Subject: Fuel Leak Case No. RO0000372 and Geotracker Global ID T0600101226,
Shell#129460, 15275 Washington Avenue, San Leandro, CA 94579

Dear Mr. Brown and Mr. Salel:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "*Soil Vapor Investigation Report*," dated October 7, 2008. The report, which was prepared on Shell's behalf by Delta Environmental, presents the results of soil vapor sampling at the site. Total petroleum hydrocarbons as gasoline and benzene were detected in soil vapor at concentrations up to 9,000,000 $\mu\text{g}/\text{m}^3$ and 12,000 $\mu\text{g}/\text{m}^3$, respectively. A Site Conceptual Model (SCM) and Tier I and Tier II RBCA assessment was included as an appendix to the report. The Tier II RBCA assessment concluded that TPHg and benzene concentrations in soil, soil vapor, and groundwater posed a risk to indoor air quality at the site and adjacent trailer park. Based on these results, the report included a recommendation to evaluate soil and groundwater remedial measures for the site and adjacent trailer park. We concur with the recommendation to evaluate remedial measures and request that you address the technical comments below and submit a Pilot Test Work Plan or Feasibility Study **by January 28, 2009**.

As discussed in technical comment 2 below, we also request that you review and revised the groundwater monitoring procedures for the site. Please submit a Groundwater Sampling Work Plan for future groundwater monitoring **by January 28, 2009**.

TECHNICAL COMMENTS

1. **Base Maps.** The base map presented on Figures 2 through 4 of the "*Soil Vapor Investigation Report*," dated October 7, 2008 are different than the base map presented in previous reports including the most recent, "*Third Quarter 2008 Groundwater Monitoring Report*," dated September 19, 2008. The building locations are also different than the building locations on Figure 3 – Aerial Photograph of the Site Area in the SCM. In addition, Figures 2 through 4 are difficult to read at a normal page size because the area of interest is

reduced to a small area in the central portion of the figure. In future reports, please use a larger scale for site figures that expands the area of interest and minimizes blank spaces on the page. In the Pilot Test Work Plan or Feasibility Study requested below, please present an accurate Site Plan that shows the following:

- Clearly labeled current and former building configurations
- Former USTs and dispensers
- Lewelling Boulevard and Washington Avenue
- Trailer park fences and structures
- Soil vapor sampling locations
- Monitoring wells

2. **Groundwater Monitoring.** Groundwater monitoring has been ongoing at the site since 1989. Selected wells are currently sampled on a semi-annual basis. It appears that the monitoring wells are sampled without purging although ORC socks were added to wells S-3 and S-9 from 2003 to 2006. Monitoring wells S-1, S-3, S-5, S-7, S-8, and SR-1 were also used as soil vapor extraction wells from May 1998 to March 1999. Given these conditions, no purge sampling does not appear to be appropriate for these wells. We request that you review the groundwater monitoring procedures and results and present revised plans for groundwater monitoring in the Groundwater Sampling Work Plan requested below. At a minimum, the Groundwater Sampling Work Plan is to include the following:

- Groundwater Sampling Procedures
- Table of well construction details
- Graphs of water levels and concentrations versus time with notations regarding purging or not purging and remediation
- Table with schedule for sampling each well and analytes
- Sufficient data to support the rationale for the proposed sampling schedule

TECHNICAL REPORT REQUEST

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

- **January 28, 2009** – Pilot Test Work Plan or Feasibility Study
- **January 28, 2009** – Groundwater Sampling Work Plan

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities.

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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.

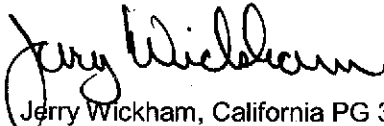
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AGENCY OVERSIGHT

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: Richard Garlow, Delta Environmental, 312 Piercy Road, San Jose, CA 95138

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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

REQUIREMENTS

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

Additional Recommendations

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

Submission Instructions

1) Obtain User Name and Password:

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

2) Upload Files to the ftp Site

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

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

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