

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

June 5, 2008

Andrew Saberi
Sabek, Inc.
1045 Airport Blvd.
South San Francisco, CA 94080

Som Gupta
c/o Carmerlengo & Johnson
500 Airport Blvd., Suite 230
Burlingame, CA 94010

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

Subject: Fuel Leak Case No. RO0000433 and Geotracker Global ID T0600101691, Shell/Sabek Inc, 1230 14th Street, Oakland, CA 94607

Dear Mr. Saberi, Mr. Brown, and Mr. Gupta:

Following review of the "Draft Corrective Action Plan and Pilot Test Work Plan," dated January 18, 2008 (Draft CAP), Alameda County Environmental Health (ACEH) staff notified potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP through mailing of a fact sheet. Public comments on the proposed remediation were accepted for a 30-day period from February 15, 2008 to March 15, 2008. No comments were received from the public.

Therefore, the Draft Corrective Action Plan is conditionally approved, provided that the technical comments below are incorporated during field implementation. Preparation of a Final CAP is not required. The technical comments below were also presented in our previous correspondence on the Draft CAP dated February 5, 2008. We request that you address the technical comments below, perform the proposed work, and send us the reports requested below.

TECHNICAL COMMENTS

- 1. Additional Soil Vapor Monitoring Well.** We request that you install one additional soil vapor monitoring well in the approximate location shown on Attachment B – Additional Soil Vapor Monitoring Well. The purpose of the additional soil vapor monitoring well is to monitor possible effects from air sparging near the property boundary. A soil vapor monitoring well that complies with the guidance for a permanent/semi-permanent gas probe contained in the California Department of Toxic Substances and California Regional Water Quality Control Board, Los Angeles Region joint guidance document entitled, "Advisory – Active Soil Gas Investigations," dated January 28, 2003 is to be installed to a depth of 5 feet bgs at the approximate location shown on Attachment B. The soil vapor monitoring well is to be sampled prior to pilot testing to establish baseline soil vapor concentrations using sampling methods and analyses that are consistent with guidance contained in, "Advisory – Active Soil Gas Investigations," dated January 28, 2003. Soil vapor samples are also to be collected following SVE/AS testing and DPE/AS testing. Soil vapor samples are to be analyzed for

Andrew Saberi
Denis Brown
Som Gupta
RO0000433
June 5, 2008
Page 2

TPHg, BTEX, and MTBE. Please present the results from the soil vapor sampling in the Pilot Test Report requested below.

2. **Continuous Soil Sampling.** We request that soils be continuously sampled for logging and screening during installation of the three new air sparging wells in order to identify any potential finer-grained layers that may affect the performance of the sparging system. Please present boring logs for the soil borings in the Pilot Test Report requested below.

TECHNICAL REPORT REQUEST

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

- **Pilot Test Report** – September 1, 2008
- **System Design** – October 1, 2008
- **45 days following the end of each quarter** – Quarterly Monitoring and Remediation Reports (System start up to be reported in Fourth Quarter 2008 Quarterly Monitoring and Remediation Report)

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

ELECTRONIC SUBMITTAL OF REPORTS

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

Andrew Saberi
Denis Brown
Som Gupta
RO0000433
June 5, 2008
Page 3

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

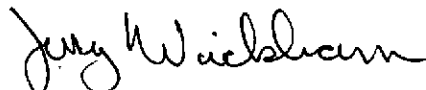
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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 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

Andrew Saberi
Denis Brown
Som Gupta
RO0000433
June 5, 2008
Page 4

Attachment A: Additional Soil Vapor Monitoring Well

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Robert Clark-Ridell, Pangea, 1710 Franklin Street, Suite 200, Oakland, CA 94612

Joan Mack, Caldwell, Leslie, Proctor & Pettit, PC, 1000 Wilshire Blvd., Suite 600, Los Angeles, CA 90017-2463

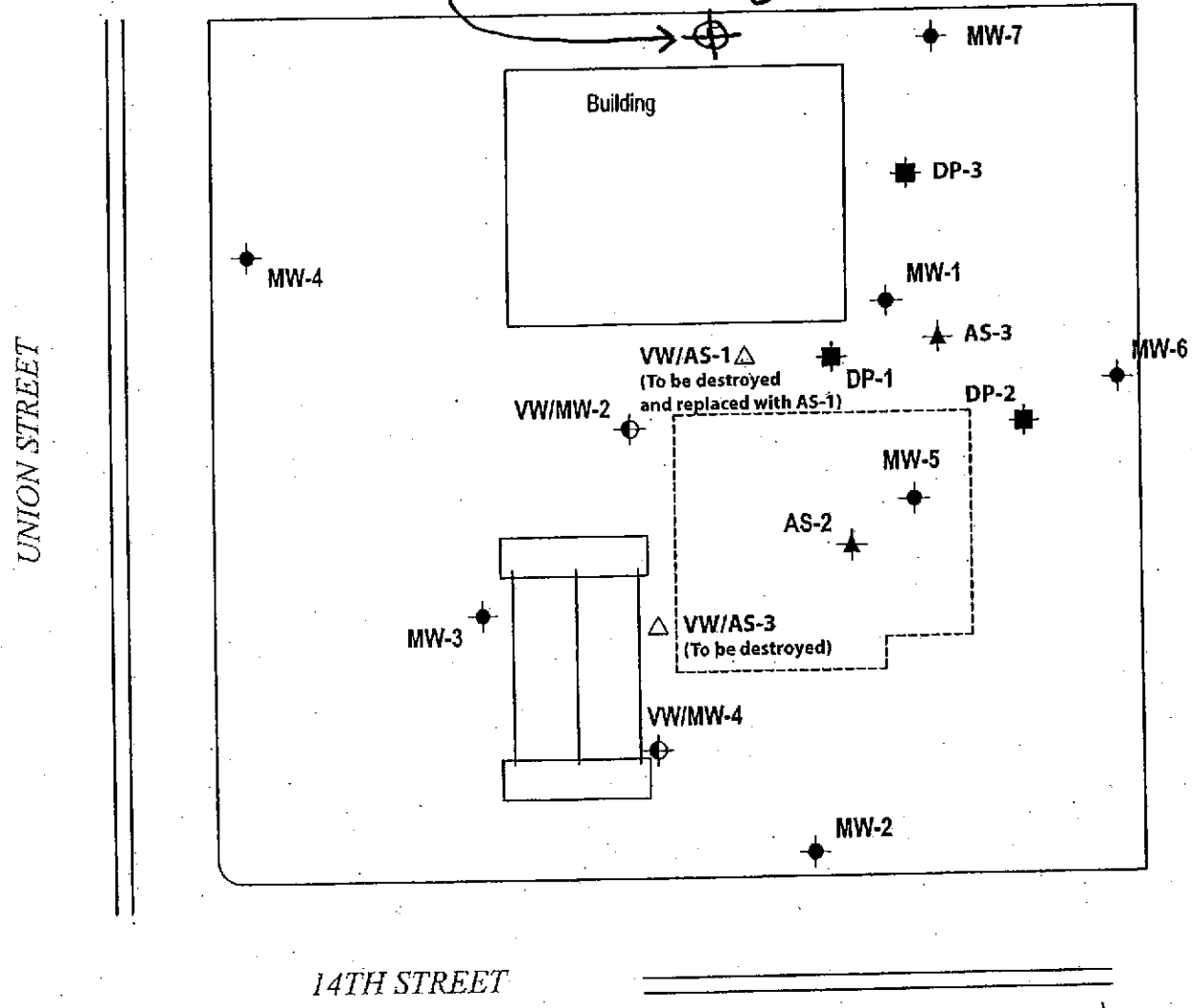
Ellen Wyrick-Parkinson, 1420 Magnolia Street, Oakland, CA 94607

M. Willingham, 1418-1420 Union Street, Oakland, CA 94607

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Attachment A Additional Soil Vapor Monitoring Well



EXPLANATION

- DP-1 ■ Proposed dual phase extraction (DPE) well
- AS-1 ▲ Proposed air sparge well (AS)
- Groundwater monitoring well
- ⊕ Combination soil vapor extraction well/monitoring well
- △ Combination soil vapor extraction well/air sparge well (to be destroyed)
- GW → Estimated groundwater flow direction

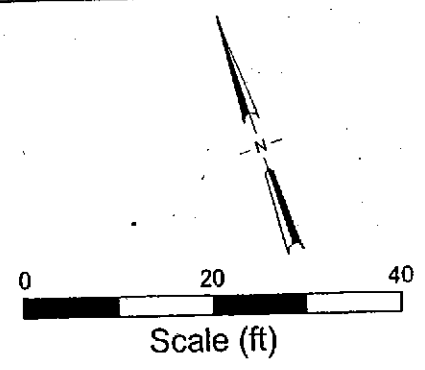


Figure 4

Former Shell Service Station
 1230 14th Street
 Oakland, California



Proposed Test Well Locations

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)