



January 16, 2018

Equilon Enterprises LLC dba Shell Oil Products US  
Attn.: Andrea Wing  
20945 S. Wilmington Ave.  
Carson, CA 90810  
Sent Via E-Mail to: [andrea.wing@shell.com](mailto:andrea.wing@shell.com)

Roland C Malone, Jr., Trust  
Attn.: Erik Parrish  
3167 Riverbend Ave.  
Eugene, OR 97408

Phua Hoi L & Lee LinLi Trust  
Attn.: Hoi (Bill) Phua & LinLi Lee, Trustees  
141 Woodland Way  
Piedmont, CA 94611  
Sent Via E-Mail to: [billphua@yahoo.com](mailto:billphua@yahoo.com)

**Subject: Request for Technical Reports**  
**Case No. RO0000486**  
**GeoTracker Global ID T0600101261**  
**Shell #13-5701**  
**4255 MacArthur Blvd.**

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the following technical reports: *Corrective Action Plan* (CAP) dated 13 February 2015 and prepared by Conestoga-Rovers & Associates (CRA); *Subsurface Investigation Report* (SIR) dated 12 December 2013 and prepared by CRA; and *Second Semiannual 2017 Groundwater Monitoring Report* (SAMR) dated 17 October 2017 and prepared by AECOM Technical Services., Inc. In addition, ACDEH met with you and your consultants on 17 July 2017 to discuss development and future cleanup plans for the property.

In July 2017, AECOM reported light non-aqueous phase liquid (LNAPL) floating on groundwater in onsite well MW-3 and offsite wells MW-2 and MW-4. The LNAPL is presumed to be weathered gasoline; however, the product in the downgradient wells has not been tested to verify this assumption. Well MW-2 is located in the adjoining mobile home park, and well MW-4 is located southeast (downgradient) of the mobile home park, between the residence at 4240 Redding Street and Interstate 580. In its February 2015 CAP, CRA concluded that LNAPL at the site and on downgradient properties did not pose any unacceptable risks to potential receptors, pending future development. If development were planned, CRA identified excavation as the likely most effective remedial technology for the site.

The site is entered into the Underground Storage Tank Cleanup Fund's Commingled Plume Account program in conjunction with the upgradient Unocal site at 4276 MacArthur Blvd. The Shell site was occupied by an automotive service station since at least 1950. Chlorinated solvents have been detected at the upgradient Unocal site and the magnitude and extent of the subsurface impacts are being investigated. Unocal's consultant recently reported buried debris and the historical presence of a paint shop in the area adjoining the service station operations.

Equilon and Bill Phua, the owner of the property at 4255 MacArthur Blvd. met with the ACDEH in July 2017 to discuss development at the site. At the meeting, Mr. Phua described his planned construction of a commercial building intended for use as a retail coffee shop at the site. To evaluate potential health risks to future occupants from vapor intrusion, Equilon proposed to prepare a workplan for additional investigation of soil vapor. The investigation results will be compiled in an updated Conceptual Site Model, describing subsurface contamination and potential human and environmental receptors that could be affected by migration of the contamination.

## **TECHNICAL COMMENTS**

ACDEH requests that you submit a workplan for investigation of soil gas at the site and address the following comments:

1. **Sample Analysis for VOCs.** All soil gas and groundwater samples collected pursuant to the workplan must be analyzed for the 51 Common Organic Compounds listed in Section 6.1 of the DTSC Active Soil Gas Investigations- Advisory, July 2015, in addition to other potential chemicals of concern at the site. The DTSC Advisory list includes chlorinated solvents and 1,4-dioxane.
2. **Mobile LNAPL at the Site and Downgradient Properties.** The 2013 and 2015 evaluations of risk to human health and the environment from the petroleum release need to be updated to include recent investigation findings and current land uses. In particular, the risk evaluations need to be updated for properties where mobile LNAPL is observed. Any new data needed to complete an updated risk assessment must be identified in the workplan. At a minimum, the workplan must include re-sampling of soil gas at downgradient properties. Please state in the workplan if wells SVP-13, SVP-14, and SVP-23 may be used to assess VOC concentrations in soil gas. These soil gas wells overlie the area where Equilon has reported free product; however, it is unknown if these wells have been damaged, or if they were constructed to current DTSC standards for soil gas investigations.
3. **LNAPL Evaluation.** Equilon removed LNAPL from downgradient wells MW-2, MW-3, and MW-4 using absorbent socks retrieved in July 2017. Well MW-2 is located on the downgradient mobile home park property; well MW-3 is located on-site; and well MW-4 is located on a third property, downgradient of the mobile home park. A fourth property, the residence at 4240 Redding Street, is located between the mobile home park and the property containing well MW-4. In October 2017, Equilon agreed to temporarily suspend use of the absorbent socks, to allow mobile LNAPL to accumulate in each of the affected wells. Any accumulated LNAPL in each of these wells needs to be sampled and analyzed for gasoline compounds.

As discussed, a corrective action plan (CAP) needs to be developed to address onsite vapor intrusion concerns and free product, if present. Prior to developing a CAP to remove the free product, ACDEH recommends that you evaluate the chemical composition and nature of the free product to support future corrective action planning. At a minimum, free product samples should be evaluated for dynamic viscosity (ASTM D445), density (ASTM D1481) and surface and interfacial tension (ASTM D971) and using the PIANO analysis (ASTM D5134 or modified EPA Method 8260).

4. **LUFT Manual.** Please refer to the Leaking Underground Fuel Tank Guidance Manual (LUFT Manual), prepared by the California State Water Resources Control Board, and revised December 2015 for guidance in preparing an acceptable workplan. The LUFT Manual may be downloaded at: [https://www.waterboards.ca.gov/ust/luft\\_manual/manual\\_dec2015.pdf](https://www.waterboards.ca.gov/ust/luft_manual/manual_dec2015.pdf).

As described in the LUFT Manual, your workplan is required to include the following elements:

- A. Proposed Work
  - B. Technical Approach
  - C. Assumptions
  - D. Analytes and Methods
  - E. Reporting
  - F. Performance Measures
  - G. Work Notice
  - H. Implementation Schedule
5. **Performance Measures.** This section of a workplan is critical to the successful execution and progress of a site toward cleanup and closure. Identify the standards to be used to evaluate the sample results,

and subsequent response actions. Your discussion must consider multiple scenarios to accommodate all likely investigation results.

- 6. Semi-Annual Groundwater Monitoring.** Semi-annual groundwater monitoring is required at this site until further notice from the ACDEH. The next groundwater monitoring event must be conducted no later than 31 January 2018 and the 1<sup>st</sup> Half 2018 Semi-Annual Monitoring Report (SAMR) must be submitted no later than 15 April 2018. Subsequent groundwater monitoring events shall be conducted during the 1<sup>st</sup> month of the 1<sup>st</sup> and 3<sup>rd</sup> Quarters of each year (i.e., January and July), and reports must be submitted by the 15<sup>th</sup> day of the following quarter. Written notice to the ACDEH 72 hours prior to groundwater sampling is required for each monitoring event. Groundwater monitoring at this site must be coordinated with the Unocal #1156 site, as required by the USTCF Commingled Plume program.

### **SUBMITTAL ACKNOWLEDGEMENT STATEMENT**

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. The language for the Submittal Acknowledgement Statement is as follows:

*I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker Website.*

### **TECHNICAL REPORT REQUEST**

Please submit the following technical reports to the ACDEH via the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- 28 February 2018 – Additional Investigation Workplan  
File to be named: RO0486\_WP\_R\_YYYY-mm-dd
- 15 April 2018 – Groundwater Monitoring Report – 1<sup>st</sup> Half 2018  
File to be named: RO0486\_GWM\_R\_YYYY-mm-dd
- 15 April and 15 October Each Year – Semi-Annual Groundwater Monitoring Report  
Files to be named: RO0486\_GWM\_R\_YYYY-mm-dd

If you have any questions, please call me at (510) 567-6721 or send me an e-mail at [robert.schultz@acgov.org](mailto:robert.schultz@acgov.org).  
Online case files are available for review at the following website: <https://geotracker.waterboards.ca.gov>.

Sincerely,



Robert W. Schultz, CHG  
Senior Hazardous Materials Specialist  
Local Oversight and Site Cleanup Program

Attachment: Attachment 1 - Responsible Party(ies) Legal Requirements / Obligations

Cc: Kenneth Williams, MacArthur/High Trailer Park, 332 Peyton Drive, Hayward, CA 94544

**Shell #13-5701**

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Jessica Ching, 4240 Redding Street, Oakland, CA 94619

Shane Olton, AECOM (*Sent via E-mail to: [shane.olton@aecom.com](mailto:shane.olton@aecom.com)*)

Peter McIntyre, AEI Environmental (*Sent via E-mail to: [pmcintyre@aeiconsultants.com](mailto:pmcintyre@aeiconsultants.com)*)

Robert W. Schultz, ACDEH (*Sent via E-mail to: [robert.schultz@acgov.org](mailto:robert.schultz@acgov.org)*)

Dilan Roe, ACDEH, Chief Land, Water Division (*Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)*)

Electronic File, GeoTracker

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

**REPORT & DELIVERABLE REQUESTS**

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO\_MAP, GEO\_XY, GEO\_Z, GEO\_BORE, GEO\_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/))

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values<sup>1</sup> as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

**GeoTracker Upload Table Example**

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

<sup>1</sup> GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: [https://www.waterboards.ca.gov/water\\_issues/programs/ustcf/](https://www.waterboards.ca.gov/water_issues/programs/ustcf/)

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.