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> October 28, 2003 Project SJ67-50S-1.000S

Mr. Scott O. Seery Alameda County Health Care Services Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 Alameda County

OCT 3 1 2003

Environmental Health

Re:

Site Conceptual Model, Sensitive Receptor Study and Site Assessment Work Plan

Shell Service Station 6750 Santa Rita Road Pleasanton, California

Dear Mr. Seery:

KHM Environmental Management, Inc. (currently Delta), on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell), submitted a site conceptual model, sensitive receptor study and a soil and groundwater assessment work plan for the site referenced above to the Alameda County Health Care Services Agency (ACHCSA), dated May 15, 2003. The work plan and associated tasks were prepared in response to a request from the ACHCSA, in a letter to Shell dated March 24, 2003. To date, Delta Environmental Consultants, Inc. (Delta) has not received any review comments or a work plan approval letter from the ACHCSA regarding the proposed assessment activities.

According to California Code of Regulations, Title 23, Section 2722, a regulatory agency has 60-days to respond to proposed site assessment activities. The above referenced work plan was submitted to the ACHCSA more than 150-days ago. This letter is to inform the ACHCSA that Delta plans to proceed with proposed soil and groundwater investigation (SWI) activities during November 2003.



SOIL AND GROUNDWATER INVESTIGATION

Delta will use cone penetration testing (CPT) to initially define site stratigraphy to a depth of approximately 110 feet bgs. CPT equipment will also be used to obtain discrete groundwater samples at various depths within the sand and gravel aquifer beneath the site. The CPT will be followed with installation of a series of multilevel groundwater monitoring wells.

CPT BORINGS

Delta will perform CPT on-site and in the shopping center parking lot south (downgradient) of the service station (Figure 1). Delta will obtain drilling permits from the Zone 7 Water Agency prior to commencement of any fieldwork. Delta has selected three locations for CPT (CPT-1 through CPT-3). At each location, the CPT equipment will initially be advanced to a depth of approximately 110 feet bg. The log from the initial CPT boring will be reviewed and groundwater sampling depths selected based on the thickness of clay, silt, sand, and gravel shown on the CPT boring log.

Subsequent CPT borings will be drilled at each location to obtain a discrete water sample at a specific depth. A small diameter bailer will be lowered through the drilling rods and the body of the CPT sampler to collect one discrete groundwater sample in each borehole. Delta anticipates obtaining groundwater from at least three depth intervals at each location. Each borehole will be filled with cement grout upon completion.

Chemical analysis will be performed on the groundwater samples from each CPT borehole. Groundwater samples will be analyzed for TPH-g, TPH-d, benzene, toluene, ethylbenzene, and xylene (BTEX compounds) and fuel oxygenates by EPA Method 8260B.

SWI REPORT

Delta will prepare a soil and water investigation (SWI) report describing field methods and summarizing the results of chemical analyses of soil and groundwater. The report will contain boring logs, certified analytical reports, chain of custody documentation, and waste disposal information. The SWI report will contain proposed well locations and screen depths/lengths based on the results of the SWI and a refined Site Conceptual Model (SCM). Incorporated into the SWI will be detailed clearly-scaled cross-sections. Cross-sections will clearly illustrate subsurface lithologies, including the locations of stringers and other zones of relatively high-permeability. Approximately 60 days after the completion of the SWI, the SWI report including the revised SCM will be submitted. The well installation process will begin as soon as the SWI report has been reviewed by the ACHCSA and well types and locations accepted. Upon completion of the installation of the offsite monitoring wells a groundwater pumping test will be done to further advance the SCM.

If you have any questions regarding this site, please contact Debbie Arnold or Lee Dooley (Delta) at (408) 224-4724.

Sincerely,

Delta Environmental Consultants, Inc.

Debbie Arnold Project Geologist

cc:

R. Lee Dooley, CHG 183 Senior Hydrogeologist

ATTACHMENTS: Figure 1 – Extended Site Map

Ms. Karen Petryna, P.E., Shell Oil Products US, Burbank, CA

