ALAMEDA COUNTY HEALTH CARE SERVICES







DAVID J. KEARS, Agency Director

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700

ENVIRONMENTAL HEALTH SERVICES

(510) 567-6700 FAX (510) 337-9335

April 19, 2007

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

Ms. Chris Davidson
City of Livermore Economic Development
1052 S. Livermore Ave.
Livermore, CA 94550

Subject: Fuel Leak Case No. RO0002525 and Geotracker Global ID T0600156427, Shell#13-5440, 318 South Livermore Avenue, Livermore, CA 94550

Dear Mr. Brown and Ms. Davidson:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site. The most recent report in our files is a report entitled, "Historic Document Review and Additional Over-Excavation Activities," dated June 30, 2006. The report, which was prepared by Delta Environmental Consultants, Inc., describes the results of a historic document review and excavation of lead-impacted soils. Five separate over-excavation events were conducted between May 2005 and February 2006. A total of approximately 725 cubic yards of lead-impacted soil was removed and 64 confirmation soil samples were collected and analyzed. The report concluded that soil with lead concentrations above the cleanup goal of 150 milligrams per kilogram had been successfully removed from the site. Based on the results of the soil excavation and confirmation soil sampling, no further excavation of lead-impacted soils is required.

Groundwater monitoring wells at the site were decommissioned in April 2006. Prior to decommissioning, the wells were reportedly sampled in April 2006. To date, we have not received a report presenting the results of the final groundwater sampling event and well decommissioning. Following receipt of these results, the site will be reviewed for case closure. We request that you complete the proposed work and send us the report described below.

TECHNICAL REPORT REQUEST

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

 May 19, 2007 – Groundwater Sampling and Well Decommissioning Report for Second Quarter 2006

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

Mr. Denis Brown Ms. Chris Davidson RO0002525 April 19, 2007 Page 2

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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.

Mr. Denis Brown Ms. Chris Davidson RO0002525 April 19, 2007 Page 3

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.

Sincerely,

Jerry Wiskham, P.G.

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: R. Lee Dooley, Delta Environmental Consultants, 175 Bernal Road, San Jose, CA 95119

Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway, Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566

Donna Drogos, ACEH Jerry Wickham, ACEH File

To:

Davidson, Chris

Subject: RE: Shell Site - 318 Livermore

Chris,

Good Morning back to you! I spoke to Lee Dooley and he indicated that Shell will be getting the closure request with a well decommssioning and groundwater monitoring report over to me probably within next couple days. I can't provide anything regarding a timeline since closure requires review and approval from my management and the Water Board. The best I could do is to write a letter indicating case is under review for closure.

Jerry

From: Davidson, Chris [mailto:cedavidson@ci.livermore.ca.us]

Sent: Thursday, April 19, 2007 8:48 AM

To: Wickham, Jerry, Env. Health

Subject: RE: Shell Site - 318 Livermore

Jerry,

Good Morning! Another stamming day here in L-Town. On the Shell site, we have a purchaser. Is there anything you can send to me that we can forward to the lender regarding the timeline for closure??? Chris

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]

Sent: Wednesday, April 18, 2007 3:51 PM

To: Davidson, Chris

Subject: RE: Shell Site - 318 Livermore

Hi Chris,

Sorry to hear you are behaving today. The status on 318 South Livermore is that Shell has not submitted the last monitoring data collected before the wells were decommissioned along with a request for closure. I spoke with Debbie Bryan a while back and asked Lee Dooley for the data most recently on March 13. I will remind Lee again. Once I get the data, I can complete the documentation and begin to work the request through the system.

Jerry

From: Davidson, Chris [mailto:cedavidson@ci.livermore.ca.us]

Sent: Wednesday, April 18, 2007 3:16 PM

To: Wickham, Jerry, Env. Health **Cc:** Hagebusch, Catherine

Subject: FW: Shell Site - 318 Livermore

Hi Jerry,

I am much better behaved today;) Please, can you tell me what is the status of the closure letter for the Shell site? Thanks ever so much, Chris

From: Debbie Bryan [mailto:DBryan@deltaenv.com]

Sent: Tuesday, March 20, 2007 11:10 AM

To: Davidson, Chris

Subject: RE: Shell Site - 318 Livermore

Hi Chris,

Sorry for the delayed response. I'm having a baby in about 6 weeks (!!!) – and am currently down to a part-time schedule at work (Tues – Thurs).

Anyway, no, there are no wells remaining at the site. We destroyed all 5 monitoring wells last year.

We do not have the final case closure letter from the County yet. I was just speaking with Jerry Wickham at the ACEH a few weeks ago though, and apparently I owe him some data. I will make sure that I get that to him before my maternity leave starts (April 9th), and the County letter should be forthcoming soon afterwards.

I will also let you know who at Delta will be taking over my projects in my absence so you have a direct contact.

Regards,

Debbie Bryan Project Geologist

Delta Consultants, Inc. Ph: 408-826-1873 Fax: 408-225-8506 dbryan@deltaenv.com

----Original Message----

From: Davidson, Chris [mailto:cedavidson@ci.livermore.ca.us]

Sent: Thursday, March 15, 2007 4:57 PM

To: Debbie Bryan Subject: Shell Site

Debbie.

Hi! Did Shell ever get a letter of no further action from the county and please refresh my memory, are there monitoring wells remaining?? I hope this finds you well:) Best, Chris

Chris Davidson
City of Livermore
Economic Development Department
1052 South Livermore Avenue
Livermore, CA 94550
Office: 925.960.4143 FAX 925.960.4149

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To:

Lee Dooley

Subject: RE: Shell; 1155 Portola, Livermore and 809 E Stanley, Livermore

Lee,

The closure for 1155 Portola has been in review since January.

Our last correspondence on 809 E. Stanley indicates that the site would be reviewed following the fourth quarter monitoring. Therefore, submit the request if you believe the site is ready for closure.

One site that I spoke with Debbie about is 318 South Livermore. To facilitate development, the wells were decommissioned in anticipation of site closure. We have not received the monitoring data from the last sampling event before the wells were decommissioned. Therefore, please submit the last 2006 monitoring data and a request for closure if appropriate.

Regards,

Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: Lee Dooley [mailto:ldooley@deltaenv.com]

Sent: Monday, March 12, 2007 1:58 PM

To: Wickham, Jerry, Env. Health

Subject: Shell; 1155 Portola, Livermore and 809 E Stanley, Livermore

Jerry,

I am following up on some of Debbie Bryan's sites as she is going on leave soon. I wanted to check regarding the status of following two sites:

- 1155 Portola, Livermore. The files show that we submitted a NFA request to you on 11/17/06. I assume that is in review or did I miss a reply?
- 809 E. Stanley, Livermore. Our project notes indicate that we would submit a case closure request after review of the 4Q06 QMR data. I have reviewed the QMR and the site still appears ready for closure. If you agree, I will prepare the closure request.

Thanks for your help.

R. Lee Dooley
DELTA CONSULTANTS
175 Bernal Road, Suite 200
San Jose, CA 95119
Phone: 408.826.1880

Cell: 408.656.2505

Toll free: (800) 477-7411

From:

Wickham, Jerry, Env. Health

Sent:

Tuesday, July 25, 2006 8:52 AM

To:

'Debbie Arnold'

Subject: RE: Former Shell: 318 S. Livermore Ave., Livermore

Hi Debbie,

Submitting the Q2 data later with the well destruction report and request for closure is preferred. I have looked at the June 30, 2006 Over-ex report, thanks for highlighting the removed samples in the data table.

Regards,

Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Wednesday, July 19, 2006 12:16 PM

To: Wickham, Jerry, Env. Health

Subject: Former Shell: 318 S. Livermore Ave., Livermore

Hi Jerry,

I just realized that typically I would've submitted a QMR to you on the 17th of this month (Monday).

I had planned to include the final groundwater sampling event data (2Q06) for this site with Delta's report documenting site well destructions and requesting case closure. That should come to you in the next two or three weeks.

Would you prefer that I submit the 2Q06 QMR data separately now? If so, I can get that out to you this week.

On another note, did you see Delta's *Historic Document Review and Additional Over-Excavation Activities* report, dated June 30, 2006?

Thx,

Debbie Arnold Project Geologist

Delta Environmental Consultants, Inc.

State Water Resources Control Board



Division of Financial Assistance

1001 I Street · Sacramento, California 95814 P.O. Box 944212 • Sacramento, California • 94244-2120 (916) 341-5714+ FAX (916) 341-5806+ www.waterboards.ca.gov/cwphome/ustcf



Arnold Schwarzenegger Governor

JUN - 6 2006 SHELL OIL COMPANY SHELL OIL PRODUCTS US - HSE/S&E DEBORAH PRYOR 20945 WILMINGTON AVE S CARSON, CA 90810

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), CLAIM NO. 004994, FOR SITE ADDRESS: 318 LIVERMORE AVE S. LIVERMORE

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$50,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

All invoices must be billed in claimants name and checks paying for invoices must come from the claimant as listed on the application. Any other invoicing and payment arrangements must be received and approved by the Fund or cost may not be reimbursed.

It is very important that you read the terms and conditions listed in the enclosed LOC. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is very important that you make use of the funding that has been committed to your cleanup in a timely manner.

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs required by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. If you have any questions about obtaining preapproval of your costs or the three bid requirement. please call Sunil Ramdass, our Technical Reviewer assigned to claims in your Region, at (916) 341-5757. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.

The following documents needed to submit your reimbursement request are enclosed:

Reimbursement Request Instructions and Information packages. Retain these packages for future reimbursement requests. These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988.

"Reimbursement Request" forms which you must use to request reimbursement of costs incurred.

California Environmental Protection Agency

"Spreadsheet" forms which you must use in conjunction with your reimbursement request.

* THIS IS IMPORTANT TO YOU, PLEASE NOTE:
Signature(s) on the application will be the signature(s) required for all future Fund documents.

You have 90 calendar days from the date of this letter to submit your first reimbursement request for incurred corrective action costs. **NO EXTENSIONS CAN BE GRANTED**. If you fail to do so, your LOC funds will automatically be reduced to zero (deobligated). Once this occurs, any future funds for this site are subject to availability when you submit your first reimbursement request. We continuously review the status of all active claims. You must continue to remain in compliance and submit a reimbursement request every 6 months. Failure to do so will result in the Fund taking steps to withdraw your LOC.

If you have any questions regarding the enclosed documents, please contact Ginny Lagomarsino at (916) 341-5722.

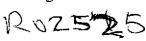
Sincerely,

Ronald M. Duff, Manager

Underground Storage Tank Cleanup Fund

Enclosures

cc: Mr. Chuck Headlee RWQCB, Region 2 1515 Clay Street, Ste. 1400 Oakland, CA 94612 Ms. Donna Drogos Alameda County EHD 1131 Harbor Bay Pkway, 2nd Fl. Alameda, CA 94502-6577



From:

Wickham, Jerry, Env. Health

Sent:

Tuesday, April 18, 2006 2:11 PM

To:

'Debbie Arnold'

Subject: RE: 318 South Livermore Ave, Livermore: Work Plan for Monitoring Well Destructions

Debbie,

No issues with the schedule.

Regards,

Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax

jerry.wickham@acgov.org

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Monday, April 17, 2006 3:46 PM **To:** Wickham, Jerry, Env. Health

Subject: 318 South Livermore Ave, Livermore: Work Plan for Monitoring Well Destructions

Jerry,

Per our recent conversation regarding the situation at this site, Delta has prepared the requested work plan.

I understood from you that Shell could proceed with the destructions, so I went ahead and scheduled a drill date for this week on Wednesday and Thursday (4/19-20).

Please let me know if there are any issues from the County with this schedule.

Thank you,

Debbie Arnold Project Geologist

Delta Environmental Consultants, Inc.

Ph: 408-826-1873 Fax: 408-225-8506 darnold@deltaenv.com

To:

Debbie Arnold

Subject: RE: 318 S. Livermore Ave., Livermore (MPA0485)

Hi Debbie,

Method 8260 is acceptable for EDB going forward.

Regards,
Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Monday, February 06, 2006 10:58 AM

To: Wickham, Jerry, Env. Health

Subject: FW: 318 S. Livermore Ave., Livermore (MPA0485)

Hi Jerry,

I think you recently noted in correspondence for another of Shell's ACEH sites, that EDB by Method 8260 is now acceptable for gw analysis. No longer necessary to run samples by Method 504.1 going forward, correct?

Regarding comments below from testing lab, no need to re-collect and re-run Sample MW-9 for analysis by 504.1 this quarter, correct?

Thx, Debbie

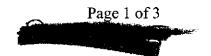
-----Original Message-----

From: Theresa Allen [mailto:tallen@sequoialabs.com]

Sent: Wednesday, January 25, 2006 2:53 PM **To:** Theresa Allen; mninokata@blainetech.com **Cc:** Heather Buckingham; Debbie Arnold

Subject: RE: 318 S. Livermore Ave., Livermore (MPA0485)

By the way, we did not run EDB by 504.1 since we did not receive the required (3) 40 ml-VOA vials (preserved w/sodium thiosulfate) without headspace. We only received HCL VOA vials and EDB is reported with the 8260B analysis. EDF by 504.1 has a 14 day holding time.



From:

Debbie Arnold [darnold@deltaenv.com]

Sent:

Friday, October 21, 2005 3:02 PM

To:

Wickham, Jerry, Env. Health

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Same day.

----Original Message----

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]

Sent: Friday, October 21, 2005 1:54 PM

To: Debbie Arnold

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Debbie,

When do you expect to backfill the excavation?

Jerry

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Friday, October 21, 2005 2:03 PM

To: Wickham, Jerry, Env. Health

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Importance: High

Jerry –

Sorry for the shorter than requested notice on this.....

Delta plans to be back on-site on Monday morning (10/24/05) at 8am to perform the additional over-ex discussed below.

I will be on-site to conduct the sampling.

- Debbie

-----Original Message-----

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]

Sent: Wednesday, October 05, 2005 10:26 AM

To: Debbie Arnold

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Debie.

Thanks for the confirmation. You are good to go.

Jerry

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Wednesday, October 05, 2005 11:04 AM

To: Wickham, Jerry, Env. Health

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Thanks Jerry.

Yes, Delta will conduct the over-ex activities per the previous phases of over-ex at the site in May and August.

Soils will be excavated to a depth of approximately 5 feet bg. At least one sidewall sample will be collected per 20 feet of sidewall, and at least one base sample will be collected from each area of excavation.

The Delta field geologist will target the organic-rich layer previously observed between approx. 2 – 3 feet bg for sidewall sample collection.

----Original Message----

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]

Sent: Wednesday, October 05, 2005 9:26 AM

To: Debbie Arnold

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Hi Debbie.

I concur with the proposed overexcavation. Please confirm that the overexcavation will be conducted as described in the previously approved work plan for excavation.

Regards,

Jerry Wickham

Hazardous Materials Specialist

Alameda County Environmental Health

1131 Harbor Bay Parkway

Suite 250

Alameda, CA 94502-6577

510-567-6791 phone

510-337-9335 Fax

jerry.wickham@acgov.org

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Wednesday, October 05, 2005 9:14 AM

To: Wickham, Jerry, Env. Health

Subject: FW: 318 Livermore Ave, Livermore: Lead Over-Ex

Hi Jerry -

Denis has agreed that Delta should direct further over-ex at this site, as outlined on the attached.

Would you like to review and provide comment as well?

Thx,

Debbie

----Original Message----From: Debbie Arnold

Sent: Tuesday, October 04, 2005 12:50 PM **To:** 'Brown, Denis L SOPUS-OP-COR-H'

Subject: 318 Livermore Ave, Livermore: Lead Over-Ex

Hi Denis,

The last phase of over-ex work to remove lead impacted soils was completed in August.

All of the additional pothole samples contained lead at levels below our approved clean-up goal (150 ppm).

However, two of the sidewall samples from the large over-ex area still contained elevated lead concentrations (max = 480 ppm).

I have attached a map showing the location of the remaining high lead concentrations in red.

In view of case closure, I recommend that we continue to over-ex and dispose of the impacted soils. I have marked out two additional areas of proposed overexcavation on the attached map, which I estimate at another 150 cubic yards approximately.

If you agree with this proposal for additional over-ex, I will forward this email to Jerry Wickham at the County for his input as well.

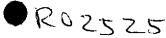
Please review and let me know how you would like to proceed.

Thank you,

Debbie Arnold Project Geologist

Delta Environmental Consultants, Inc.

Ph: 408-224-4724 Fax: 408-225-8506 darnold@deltaenv.com



From:

Debbie Arnold [darnold@deltaenv.com]

Sent:

Wednesday, October 05, 2005 11:04 AM

To:

Wickham, Jerry, Env. Health

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Thanks Jerry.

Yes, Delta will conduct the over-ex activities per the previous phases of over-ex at the site in May and August.

Soils will be excavated to a depth of approximately 5 feet bg. At least one sidewall sample will be collected per 20 feet of sidewall, and at least one base sample will be collected from each area of excavation.

The Delta field geologist will target the organic-rich layer previously observed between approx. 2-3 feet bg for sidewall sample collection.

----Original Message----

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]

Sent: Wednesday, October 05, 2005 9:26 AM

To: Debbie Arnold

Subject: RE: 318 Livermore Ave, Livermore: Lead Over-Ex

Hi Debbie.

I concur with the proposed overexcavation. Please confirm that the overexcavation will be conducted as described in the previously approved work plan for excavation.

Regards,

Jerry Wickham

Hazardous Materials Specialist

Alameda County Environmental Health

1131 Harbor Bay Parkway

Suite 250

Alameda, CA 94502-6577

510-567-6791 phone

510-337-9335 Fax

jerry.wickham@acgov.org

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Wednesday, October 05, 2005 9:14 AM

To: Wickham, Jerry, Env. Health

Subject: FW: 318 Livermore Ave, Livermore: Lead Over-Ex

Hi Jerry -

Denis has agreed that Delta should direct further over-ex at this site, as outlined on the attached.

Would you like to review and provide comment as well?

Thx, Debbie

----Original Message-----From: Debbie Arnold

Sent: Tuesday, October 04, 2005 12:50 PM **To:** 'Brown, Denis L SOPUS-OP-COR-H'

Subject: 318 Livermore Ave, Livermore: Lead Over-Ex

Hi Denis.

The last phase of over-ex work to remove lead impacted soils was completed in August.

All of the additional pothole samples contained lead at levels below our approved clean-up goal (150 ppm).

However, two of the sidewall samples from the large over-ex area still contained elevated lead concentrations (max = 480 ppm).

I have attached a map showing the location of the remaining high lead concentrations in red.

In view of case closure, I recommend that we continue to over-ex and dispose of the impacted soils. I have marked out two additional areas of proposed over-excavation on the attached map, which I estimate at another 150 cubic yards approximately.

If you agree with this proposal for additional over-ex, I will forward this email to Jerry Wickham at the County for his input as well.

Please review and let me know how you would like to proceed.

Thank you,

Debbie Arnold Project Geologist

Delta Environmental Consultants, Inc.

Ph: 408-224-4724 Fax: 408-225-8506 darnold@deltaenv.com

From:

Wickham, Jerry, Env. Health

Sent:

Friday, September 16, 2005 10:43 AM

To:

'Debbie Arnold'

Subject: RE: Former Shell: 318 S. Livermore Ave

Debbie,

I agree that the soil samples can be analyzed for EDB by Method 8260 rather than 504.1.

Regards,
Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Friday, September 16, 2005 10:20 AM

To: Wickham, Jerry, Env. Health

jerry.wickham@acgov.org

Subject: Former Shell: 318 S. Livermore Ave

Jerry -

We completed installation of Well MW-9 on-site yesterday.

During Delta's previous soils investigation in June we analyzed samples for EDB by EPA Method 504.1 in an effort to reach a clean-up goal of 0.05 ug/kg.

However, I believe a clean-up goal of 0.05 ug/L was approved by the ACEH in relation to groundwater..... not soil. Basically, I think Delta went "above and beyond" with the last round of soil analysis. EBD by Method 504.1 for soil proved to be costly and difficult – samples had to be shipped to Florida for the special analysis as our local lab could not do it. Furthermore, the reporting limits varied for each soil sample tested (ranged between 0.067 and 0.070 ug/kg). An RL of 0.05 ug/kg was not achieved.

So.....

I would like to confirm with you that we can run our current set of soil samples from MW-9 for EDB by Method 8260 rather than 504.1.

The reporting limit by Method 8260 is 0.005 mg/kg.

Thank you,

AGENCY







ENVIRONMENTAL HEALTH SERVICES

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

July 18, 2005

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

Subject: Fuel Leak Case No. Shell#13-5440, 318 South Livermore Avenue, Livermore CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Soil and Groundwater Investigation and Over-Excavation Report," dated July 11, 2005, and "Quarterly Monitoring Report – Second Quarter 2005," dated June 10, 2005. Both reports were prepared on behalf of Shell by Delta Environmental Consultants, Inc. The "Soil and Groundwater Investigation and Over-Excavation" report presents the results from three soil borings drilled in June 2005 and overexcavation of fill material containing elevated concentrations of lead. The report includes recommendations for over-excavation of soil in the central portion of the site and additional investigation potholes to define the extent of lead in fill materials in the southern portion of the site. The report also includes a recommendation to install an additional monitoring well between existing wells MW-7 and MW-8. ACEH concurs with the recommendations provided that the conditions identified in the technical comments below are met.

Please address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to ierry.Wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- Over-Excavation. ACEH concurs with the proposed excavation area to remove the fill
 material containing elevated concentrations of lead. Confirmation samples are to be
 collected from the darker (high organic) soil layer at intervals of no greater than 20 feet along
 the sidewalls of the excavation. A minimum of two confirmation soil samples is to be
 collected from the base of the excavation. All soil samples are to be analyzed for total lead
 using EPA Method 6010B. The volumes and weight of soil removed from the site is to be
 documented and reported. Copies of waste manifests are required. All results are to be
 presented in the report requested below.
- Investigation Potholes. ACEH concurs with the proposed locations for additional potholes
 on Figure 3 and collection of soil samples to define the extent of elevated lead concentrations
 in fill material but requests that an additional pothole be excavated and sampled in the area
 of MW-5, north of the proposed excavation area. All results are to be presented in the report
 requested below.

Mr. Denis Brown July 18, 2005 Page 2

- 3. Additional Monitoring Well MW-9. ACEH concurs with the recommendation to install proposed monitoring well MW-9 between existing wells MW-7 and MW-8. During well installation, soil samples are to be collected for laboratory analysis at five-foot intervals. The soil samples are to be analyzed for total petroleum hydrocarbons as gasoline (TPHg), BTEX compounds, MTBE, TBA, and 1,2-DCA by EPA Method 8260B; ethylene dibromide (EDB) by EPA Method 504.1; and total lead by EPA Method 6010B. The well is to have a screened interval of 5 feet, installed within the sand and gravel unit previously encountered approximately 30 feet bgs. Following installation and development, monitoring well MW-9 is to be sampled quarterly for four quarters. Groundwater samples are to be analyzed for TPHg; BTEX compounds; the fuel oxygenates, MTBE, DIPE, ETBE, TAME, and TBA; and 1,2-DCA by EPA Method 8260B; EDB using EPA Method 504.1; and total lead using EPA Method 6010B.
- 4. Groundwater Monitoring for Existing Wells. Based on the consistent monitoring results obtained from existing wells MW-5, MW-6, MW-7, and MW-8, the sampling frequency for the existing wells can be reduced from quarterly to semi-annual during the second and fourth quarters. In addition, the fuel oxygenates DIPE, ETBE, and TAME can be eliminated from the analysis for the existing wells.

TECHNICAL REPORT REQUEST

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

- October 19, 2005 Well Installation and Over-excavation Report
- January 17, 2006 Quarterly Report for the Fourth Quarter 2005

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.

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

Mr. Denis Brown July 18, 2005 Page 3

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.

Sincerely,

Jerry Wickham, P.G.:

Hazardous Materials Specialist

cc: Debbie Arnold, Delta Environmental Consultants, 175 Bernal Road, San Jose, CA 95119

Colleen Winey, QIC 80201

Zone 7 Water Agency, 100 North Canyons Parkway, Livermore, CA 94551

Paul Smith, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street, Pleasanton, CA 94566

Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore Ave., Livermore, CA 94550

Donna Drogos, ACEH Jerry Wickham, ACEH File

From:

Wickham, Jerry, Env. Health

Sent:

Monday, June 06, 2005 11:33 AM

To:

'Debbie Arnold'

Subject: RE: 318 Livermore - potholing

Debbie,

Your proposed locations for potholing look good. I have no suggested changes.

Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Monday, June 06, 2005 11:07 AM

To: Wickham, Jerry, Env. Health **Subject:** 318 Livermore - potholing

Jerry,

Given where we know concrete debris has been encountered in the surficial soils, I have laid out 6 pothole locations to try to determine the extent of the fill material across the site.

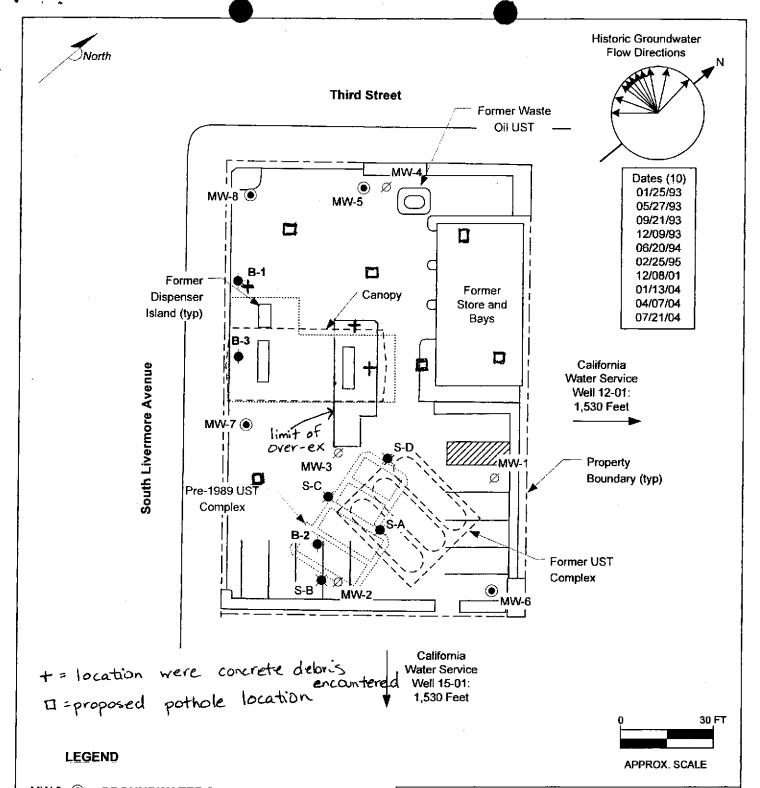
Please take a look at the attached map and let me know if you would suggest any changes.

I have also attached a couple of photos showing the concrete encountered during the over-ex activities. In one of the photos you can see the shallower, darker (lead-impacted) soils, and some small concrete chunks in the trench wall.

Debbie Arnold Project Geologist

Delta Environmental Consultants, Inc.

Ph: 408-224-4724 Fax: 408-225-8506 darnold@deltaenv.com



MW-6 (**GROUNDWATER MONITORING WELL**

PROPOSED SOIL BORING

S-C **SOIL BORINGS, 1989**

FORMER GROUNDWATER MONITORING MW-1 Ø WELL

APPROXIMATE GROUNDWATER FLOW 0.012 R/R **DIRECTION AND GRADIENT (11/11/04)**

FIGURE 1

SITE MAP

FORMER SHELL-BRANDED SERVICE STATION 318 South Livermore Avenue Livermore, California

PROJECT NO. SJ31-8LI-1.2004	DRAWN BY VF 9/25/03	
FILE NO. SJ31-8LI-1.2004	PREPARED BY VF	
REVISION NO.	REVIEWED BY	





From:

Debbie Arnold [darnold@deltaenv.com]

Sent:

Monday, June 06, 2005 11:07 AM

To:

Wickham, Jerry, Env. Health

Subject:

318 Livermore - potholing

Attachments: 318 Livermore - Pothole Map.pdf; Over-ex trench (5-4-05).jpg; over-ex trench (5-18-04).JPG

Jerry,

Given where we know concrete debris has been encountered in the surficial soils, I have laid out 6 pothole locations to try to determine the extent of the fill material across the site.

Please take a look at the attached map and let me know if you would suggest any changes.

I have also attached a couple of photos showing the concrete encountered during the over-ex activities. In one of the photos you can see the shallower, darker (lead-impacted) soils, and some small concrete chunks in the trench wall.

Debbie Arnold Project Geologist

Delta Environmental Consultants, Inc.

Ph: 408-224-4724 Fax: 408-225-8506 darnold@deltaenv.com

From:

Wickham, Jerry, Env. Health

Sent:

Monday, June 06, 2005 10:42 AM

To:

'Debbie Arnold'

Subject: RE: 318 Livermore - hoist pull

Debbie.

I would like TPH D, J, and K by EPA 3550 in addition to TOG for the hoist soil samples.

Jerry

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Monday, June 06, 2005 9:04 AM **To:** Wickham, Jerry, Env. Health

Subject: RE: 318 Livermore - hoist pull

Jerry – do you want to see any specific analyses for the hoist soil samples other than TOG?

----Original Message-----

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]

Sent: Monday, June 06, 2005 8:13 AM

To: Debbie Arnold

Subject: RE: 318 Livermore - hoist pull

Debbie,

Thanks for the update. I have a meeting scheduled for 9:00 am on Tuesday so I won't be out for the hoist removal. I can come out to the site in the afternoon on Tuesday if it looks you will be able to do some potholing on Tuesday.

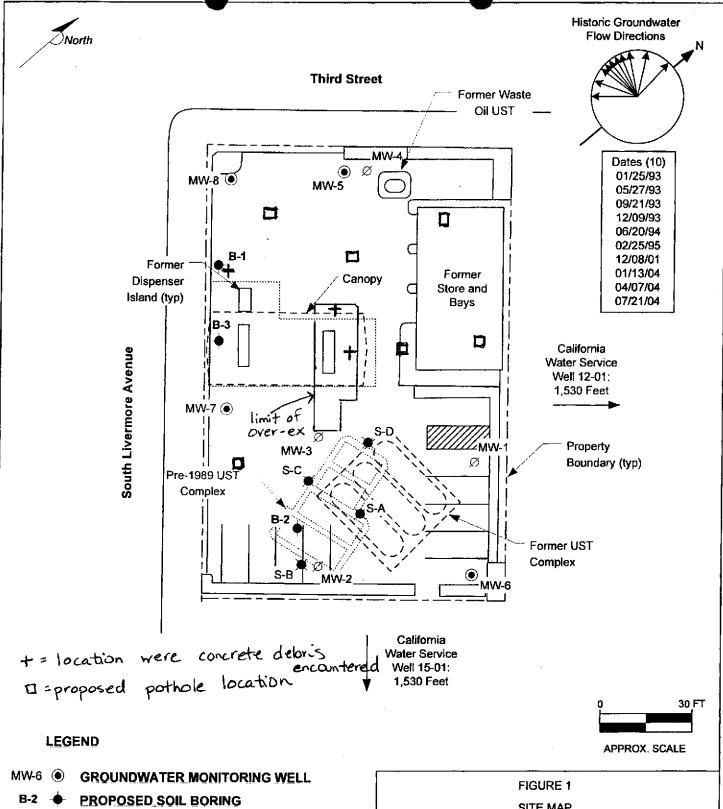
Thanks,

Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Friday, June 03, 2005 3:42 PM **To:** Wickham, Jerry, Env. Health **Subject:** 318 Livermore - hoist pull

Jerry,



S-C **SOIL BORINGS, 1989**

FORMER GROUNDWATER MONITORING MW-1 Ø WELL

APPROXIMATE GROUNDWATER FLOW 0.012 ft/ft **DIRECTION AND GRADIENT (11/11/04)**

SITE MAP

FORMER SHELL-BRANDED SERVICE STATION 318 South Livermore Avenue Livermore, California

PROJECT NO.	DRAWN BY
SJ31-8LI-1.2004	VF 9/25/03
FILE NO.	PREPARED BY
SJ31-8LI-1.2004	VF
REVISION NO.	REVIEWED BY



Drogos, Donna, Env. Health

From:

Drogos, Donna, Env. Health

Sent:

Wednesday, May 18, 2005 6:01 PM

To:

'Smith, Paul'

Cc:

'darnold@deltaenv.com'; Wickham, Jerry, Env. Health

Subject: RE: additional lead soil removal former Shell Station, 318 S. Livermore Ave., Livermore

Tracking: Recipient

Read

'Smith, Paul'

'darnoid@deltaenv.com'

Wickham, Jerry, Env. Health Read: 5/18/2005 6:07 PM

Hi Paul, Jerry Wickham (567-6791) from our office is taking over this project. He is scheduled to be out at the site for fieldwork on 5/23. He is also communicating with Delta but I am not certain he was aware of work today ...? Recc. Delta followup with Jerry (if they haven't already) re: today's & any

future excavation work.

Donna

From: Smith, Paul [mailto:PSmith@lpfire.org] Sent: Wednesday, May 18, 2005 4:48 PM

To: Debbie Arnold

Cc: Drogos, Donna, Env. Health

Subject: Re: additional lead soil removal former Shell Station, 318 S. Livermore Ave., Livermore

Hi Debbie.

Just wondering how it went today? Did any one show up from ACDEH/LOP? I phoned Donna Drogos but haven't heard back yet. Please provide copies of analytical results/reports for the last round if sampling where you got lead results of 390 and 560 mg/kg of lead. Also please keep me in the loop for results/technical report for today's scope of work.

Since the City of Livermore owns or will own this property the Fire Marshall has asked me to keep apprised of this project.

Thanks,

Paul M. Smith

Hazardous Materials Inspector Livermore-Pleasanton Fire Department 3560 Nevada St. Pleasanton, CA 94566 (925) 454-2339 office (925) 454-2367 fax

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Tuesday, May 17, 2005 5:26 PM

To: Smith, Paul

Subject: FW: RO-2525 5/23 drilling schedule RE: Shell Demo @ 318 S. Livermore Ave.

FYI

----Original Message-----

From: Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]

Sent: Monday, May 09, 2005 5:45 PM

To: Debbie Arnold

Cc: Davidson, Chris; Brown, Denis & SOPUS-OP-COR-H; Wickham, Jerry, Env. Health; Young, Glenn

Subject: RO-2525 5/23 drilling schedule RE: Shell Demo @ 318 S. Livermore Ave.

Debbie:

As you know, my last day will be 5/12, so I will not be able to oversee the drilling portion of work at this site. I know that ACEH LOP is looking for a new caseworker. In the interim, I am hopeful that Jerry Wickham may be able to help out on this site; however, assignment will be made by Donna. If this site is given to him, I will encourage him to go out on 5/23 to observe; and hopefully get some background info from you.

Some follow up questions:

Can you email me an update on the lead issue in shallow soils? Do you have more analytical data? Was Friday's removal performed and was it successful? Denis mentioned additional sampling, was this performed? Are you still running lab analyses or have you considered a field test to help guide excavation? Does the source continue to appear to be leaded gasoline from the dispenser piping? I'm asking these questions as I would like to put together as complete a report as possible for the subsequent caseworker. I think that a complete report will facilitate the transfer and help with the case closure efforts.

Thank you, Bob

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Monday, May 02, 2005 12:01 PM

To: Schultz, Robert, Env. Health

Cc: Davidson, Chris

Subject: FW: Shell Demo @ 318 S. Livermore Ave.

Oh, and on another note......

Drilling for the 3 site soil borings has been rescheduled for Monday, May 23rd (this was the first date the driller had available).

We may go into Tuesday, but the driller is confident that we will get the borings done in just one day.

-----Original Message----From: Debbie Arnold

Sent: Monday, May 02, 2005 10:56 AM **To:** 'Schultz, Robert, Env. Health'; Smith, Paul

Cc: 'Davidson, Chris'

Subject: FW: Shell Demo @ 318 S. Livermore Ave.

Paradiso confirmed that canopy is down this morning!!!

Delta plans to be on-site this Wednesday, May 4th, to direct the over-ex and collect confirmation soil samples.

Bob and Paul do either, or both, of you want to observe the excavation and sampling activities?

We will start at 8am. Jim Bobey will be Delta's sampling technician.

- Debbie

From: Debbie Arnold [mailto:darnold@deltaenv.com]

Sent: Monday, April 25, 2005 9:24 AM **To:** Schultz, Robert, Env. Health; Smith, Paul

Cc: Davidson, Chris; Brown, Denis L SOPUS-OP-COR-H **Subject:** FW: Shell Demo @ 318 S. Livermore Ave.

Importance: High

Bob / Denis.

Per Paradiso, demo work at the subject site has been postponed one week.

Canopy demo will now commence on Monday, May 2nd.

I am trying to reschedule the drill rig for the week of May 9th. Will update all when drill date confirmed.

- Debbie

----Original Message-----From: Debbie Arnold

Sent: Thursday, April 21, 2005 8:06 AM

To: 'Schultz, Robert, Env. Health'; Smith, Paul; Scott Polston

Cc: liddy@grinc.com; cedavidson@ci.livermore.ca.us; 'Brown, Denis L SOPUS-OP-COR-H'

Subject: RE: Shell Demo @ 318 S. Livermore Ave.

Bob,

Delta is now able to proceed with fieldwork for the above referenced site, outlined in our January 20, 2005 Investigation and Excavation Work Plan – Second Revision.

The first stage of site activities will involve demo of the existing former service station canopy, and removal of canopy footings.

Canopy demo will be conducted by Paradiso Mechanical Inc., and will begin next Monday, April 25th. Demo and removal activities are anticipated to take approximately 2 days.

Following the demo, Delta will direct Paradiso in over-excavation of impacted soils beneath the former eastern dispenser area.

Excavation and backfill work is anticipated to be complete by approximately Thursday, April 28th. Paradiso will be offsite by the end of the week.

The second stage of site activities (three exploratory borings) will commence on Tuesday, May 3^{rd} – and should be complete by end of day on May 4^{th} .

Please call me if you have any questions or concerns.

Regards,

Debbie Arnold Project Geologist

Delta Environmental Consultants, Inc.

Ph: 408-224-4724 Fax: 408-225-8506 darnold@deltaenv.com

----Original Message-----

From: Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]

Sent: Thursday, April 21, 2005 7:09 AM

To: Smith, Paul; Scott Polston

Cc: liddy@grinc.com; Debbie Arnold; cedavidson@ci.livermore.ca.us

Subject: RE: Shell Demo @ 318 S. Livermore Ave.

Thank you for the heads up. Please call or email if the schedule changes.

Bob

Robert W. Schultz, P.G. Hazardous Materials Specialist Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502 510-567-6719 (direct) 510-337-9335 (facsimile)

From: Smith, Paul [mailto:PSmith@lpfire.org] **Sent:** Thursday, April 21, 2005 8:01 AM

To: Scott Poiston

Cc: liddy@grinc.com; Schultz, Robert, Env. Health **Subject:** RE: Shell Demo @ 318 S. Livermore Ave.

Hi Scott/Liddy,

I got a voice mail from Scott yesterday asking me to email you Liddy.

I approved the project on Tuesday AM with the attached comments. Also I neglected to mention please also let the lead caseworker with ACDEH/LOP Bob Schultz know (510) 567-6719, the particulars of when you'll start. Me too, what time on Tuesday?

Thanks,

Paul M. Smith

Hazardous Materials Inspector Livermore-Pleasanton Fire Department 3560 Nevada St. Pleasanton, CA 94566 (925) 454-2339 office (925) 454-2367 fax

From: Scott Polston [mailto:spolston@grinc.com]

Sent: Wednesday, April 20, 2005 7:50 AM

To: Smith, Paul

Subject: Shell Demo @ 318 S. Livermore ave.

Paul,

We submitted the paperwork to the city and they told us that the only approval they needed was from you. Have you had an opportunity to look at the project.

The contractor would like to start next Tuesday. Would you please let me know what the status is. Thanks

Scott Polston Permit Expeditor Gettler-Ryan, Inc.

Schultz, Robert, Env. Health

From: Brown, Denis L SOPUS-OP-COR-H [denis.l.brown@shell.com]

Sent: Friday, May 06, 2005 1:36 PM

To: Schultz, Robert, Env. Health

Subject: RE: RO-2525: 318 S Livermore - lead in shallow soils

Bob,

Understand issue resolved. Did not get Debbie's e-mail prior to yours. So, we will proceed as outlined.

Thanks,

Denis

Denis L. Brown

Sr. Environmental Engineer

Shell Oil Products US HSE - Environmental Services 20945 S. Wilmington Ave. Carson, CA 90810-1039

Bus. 707-865-0251 Fax. 707-865-2542 Cell 707-290-9101

denis.l.brown@shell.com

----Original Message-----

From: Schultz, Robert, Env. Health [mailto:robert.schultz@acgov.org]

Sent: Thursday, May 05, 2005 4:58 PM **To:** Brown, Denis L SOPUS-OP-COR-H

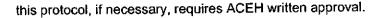
Cc: Debbie Arnold; cedavidson@ci.livermore.ca.us; Young, Glenn; Smith, Paul

Subject: RO-2525: 318 S Livermore - lead in shallow soils

Hi Denis:

I was at the subject site yesterday together with Paul Smith of LPFD to observe overexcavation of lead contaminated soils. Based on the information presented to date, the lead is believed to be the result of leaded gasoline that was previously used at the site and released from piping near a fuel dispenser. Lead was initially detected in a piping upgrade sample and detected yesterday in confirmation sidewall samples collected from approximately 3 ft bgs in clayey gravels. Up to 560 mg/kg lead was detected. According to Delta, samples collected in gravels encountered at 10 ft bgs contained lead consistent with anticipated naturally occurring background concentrations. Analysis of samples of gravels encountered at 5 ft bgs is pending.

To address the detected concentrations and progress toward the objective of an unrestricted closure, it appears that the excavation needs to be expanded in the directions where lead above the site cleanup goal was detected. Currently approved confirmation sampling protocol includes collection of sidewall samples at a frequency of 1 sample per 20 ft of sidewall and bottom samples at 1 sample per 100 sq ft. Modification of



I can not be onsite to observe additional excavation tomorrow; however, I understand that Shell wishes to proceed with work and to minimize standby-related delays to control project costs. Since, based on the information currently available, lead contamination seems to be present in the clayey shallow soils and not detected in the underlying gravels at 10 ft bgs, future sidewall samples need to be collected within the clayey gravels. To ensure that samples locations are appropriately selected, and that all lead-contaminated soils above the cleanup goal are removed, we request that over-excavation be directed by an experienced field geologist, preferably a California Professional Geologist (PG). Differentiation bettween clayey gravels and underlying gravels with lower anticipated organic content appears critical to the successful removal of lead and to the cost-effectiveness of the over-excavation. Provided that work is to be overseen by a qualified field geologist, and that work is performed in compliance with the conditions specified in our 1/21/05 letter to Shell, this office has no objection to your continuing overexcavation of shallow soils tomorrow. Please fax or email all analytical results and sample location maps to me as they are available so that ACEH may continue to actively assist with this project.

Please call me at 510-567-6719 if you have any questions regarding this request or other ACEH requirements for this case.

Sincerely, Bob Schultz

Robert W. Schultz, P.G.
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510-567-6719 (direct)
510-337-9335 (facsimile)



TO-2525

www.deltaenv.com

Solving environment-related business problems worldwide

175 Bernal Road • Suite 200 San Jose, California 95119 USA 408.224.4724 800.477.7411 Fax 408.225.8506

March 10, 2005

Project Number: SJ31-8LI-1.2005

Mr. Robert Schultz
Hazardous Materials Specialist
Alameda County Health Care Services Agency
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: Current Property Owner Former Shell Service Station 318 South Livermore Avenue Livermore, California

Dear Mr. Schultz:

Delta Environmental Consultants, Inc. (Delta) on behalf of Shell Oil Products US (Shell), submits this letter to inform all parties concerned of a property ownership change regarding the property referenced above. The current property owner is identified as:

Redevelopment Agency of the City of Livermore

Attn: Linda M Barton

1052 S. Livermore Avenue

Livermore, CA 94550

The Redevelopment Agency of the City of Livermore will receive copies of all documents related to the existence of petroleum hydrocarbons in soil and groundwater beneath the subject property. Shell will be represented by Ms. Karen Petryna, the Shell environmental engineer for the site area.

If you have any questions regarding this letter, please call me at (408) 224-4724.



Sincerely,

Delta Environmental Consultants, Inc.

Debbie Arnold Project Manager

cc: Karen Petryna, Shell Oil Products US, Carson

Linda M. Barton, Redevelopment Agency of the City of Livermore, Livermore

Eric Uranga, City of Livermore, Economic Development, Livermore Danielle Stefani, Livermore-Pleasanton Fire Department, Pleasanton

AGENCY

DAVID J. KEARS, Agency Director



January 21, 2005

Karen Petryna Shell Oil Products US 20945 S. Wilmington Ave. Carson, CA 90810 ENVIRONMENTAL HEALTH SERVICES

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

Subject:

Fuel Leak Case No. RO0002525, Shell #13-5440, Former Service Station at 318

Livermore Avenue, Livermore, California –Workplan Approval

Dear Ms. Petryna:

Alameda County Environmental Health (ACEH) has reviewed your January 20, 2005, *Investigation and Excavation Work Plan* – Second Revision prepared by Delta Environmental Consultants, Inc., for the above-referenced site. We concur with your workplan provided the following conditions are met:

- 1. As required by 23 CCR 2725(a), sufficient data will be collected to define the likely vertical extent of contamination. To help achieve this goal, and thereby progress the case towards regulatory closure, ACEH requested in our December 20, 2004 letter that you drill boring B-2 to depth sufficient to fully define the vertical extent of residual fuel. Additional discussion of this issue is provided under Technical Comment #1, below.
- A minimum of six excavation confirmation samples will be collected and analyzed. The six samples will include one sample from each of the four sidewalls and two samples from the excavation bottom.
- 3. Soil excavation practices will be compliant with all Bay Area Air Quality Management District rules and regulations.
- 4. Volume and weight of all soil removed from the site as part of the cleanup action will be documented and reported. Copies of waste manifests are required.
- 5. If deemed necessary by your geologist or engineer to fully define the vertical and lateral extent of contamination, additional soil or groundwater samples will be collected as part of the current investigation efforts. ACEH will be informed via telephone or email of any additions to the sampling and analysis plan. Any additional work will follow the workplan-specified procedures. Dynamic investigations are consistent with USEPA protocol for expedited site assessments, which are scientifically valid and offer a cost-effective approach to fully define a plume and to help progress a case toward closure.
- 6. Because detected 1,2-DCA concentrations exceed the applicable cleanup goal, sufficient data will be collected in the field and/or from historical site investigation to evaluate natural attenuation of this compound and the likely time period required for the site to achieve water quality objectives.
- 72-hr advance written notification (email preferred) will be provided to ACEH prior to field sampling activities.

Please implement the proposed investigation and submit technical reports following the schedule below. In addition, we request that you address the following technical comments in your report.

TECHNICAL COMMENTS

1. Vertical Definition

As required by 23 CCR 2725(a), and consistent with State Water Resource Control Board Resolution 92-49 (II,A,1,a&b) *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304*, ACEH requires definition of the likely vertical extent of contamination. We will be unable to close this fuel leak case if the likely vertical extent of contamination is not suitably defined. Due to historical groundwater level fluctuation, and uncertainty regarding the timing of the fuel release, soils currently located below the water table could have been affected by the release.

Typically, as a preliminary step in defining the vertical extent of source area contamination, ACEH recommends that soil samples be collected and analyzed from a boring within the footprint of the former UST field (or point of fuel release) to at least 10 ft below the total depth of contamination, as identified by field screening of samples. We do not share Delta's concern regarding cross-contamination during source area drilling below the water table for the following reasons: 1) no free product has been detected; 2) while groundwater can enter hollow-stem augers during soil sampling and be carried downward inside the augers, this occurrence can be minimized by a combination of purging and introduction of deionized water; 3) an alternative drilling technology may be used; and 4) the boring B-2 will be temporary and will be tremie grouted to ground surface immediately following drilling.

In your investigation report, the nature and vertical and lateral extent of contamination needs to be defined for this site to progress towards case closure. Please submit your evaluation in the report requested below.

2. Case Closure Evaluation

Depending on the results of the proposed investigation, and on the success of the proposed soil excavation, this site may be considered for case closure. If you determine that closure review is warranted, we request that you include, at a minimum, the following documentation as part of your investigation report: 1) comprehensive summary tables for soil and groundwater presenting all historical and current data for the site (analytical data representative of soil which has been removed from the site – i.e. pre-remediation data – should be clearly flagged); 2) maps showing plotted soil and groundwater concentrations; 3) depth-specific isoconcentration maps for key groundwater contaminants of concern where water quality objectives are exceeded; 4) comparison of soil and groundwater concentrations to the cleanup levels and goals; and 5) identification of subsurface utilities and wells potentially affected by the release in accordance with 23 CCR 2654b(2). Please include your evaluation and documentation in the report requested below.

REPORT REQUEST

Please submit your *Soil and Water Investigation Report,* which addresses the comments above by **April 21, 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735 and 7835.1) requires that workplans 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.

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

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 County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely.

Robert W. Schultz, R.G.

Ribert W. Sel

Hazardous Materials Specialist

Cc: Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore,

Livermore, CA 94550

Danielle Stefani, Livermore - Pleasanton Fire Department, 3560 Nevada St., Pleasanton,

CA 94566

Matt Katen, Zone 7 Water District, QIC 80201

Donna Drogos, ACEH

Robert W. Schultz, ACEH

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

December 20, 2004

Karen Petryna Shell Oil Products US 20945 S. Wilmington Ave. Carson, CA 90810 **ENVIRONMENTAL HEALTH SERVICES**

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

Subject:

Fuel Leak Case No. RO0002525, Shell #13-5440, Former Service Station at 318 Livermore Avenue, Livermore, California – Request for Workplan Addendum

Dear Ms. Petryna:

Alameda County Environmental Health (ACEH) has reviewed your November 3, 2004 Revised Investigation and Excavation Work Plan and the case file for the above-referenced site. Petroleum hydrocarbons, MTBE, and DIPE were detected in site groundwater following monitoring well installation in September 2001. During UST system removals in December 2003 and other site decommissioning activities in January 2004, up to 45 mg/kg petroleum hydrocarbons, 0.2 mg/kg toluene, 0.11 mg/kg ethylbenzene, 0.84 mg/kg xylenes, 0.016 mg/kg TBA, 380 mg/kg lead and various concentrations of other VOCs and SVOCs, were detected in site soil. To investigate the extent of contamination and to cleanup the site to unrestricted land use (residential) standards, your consultant, Delta Environmental Consultants, Inc., proposes drilling two exploratory borings and removal of soils from beneath a former fuel dispenser location. ACEH requires that you modify your workplan and propose additional sampling to fully investigate your release. Please revise your workplan and submit an addendum to address the technical comments below. This request is made in the interest of minimizing the number of iterations of field work performed at leaking UST sites, and to thereby reduce both the time period and costs for a case to progress to closure.

TECHNICAL COMMENTS

Downgradient Groundwater Sampling

Due to historical fluctuation in the groundwater flow direction at the site, more than one boring needs to be drilled and sampled downgradient (southwest) of the former dispenser locations (towards South Livermore Avenue). Boring B-1 is insufficient to fully investigate downgradient groundwater quality. We recommend that you locate an additional boring along the investigation transect formed by sampling locations MW-8, B-1 and MW-7, and that the additional boring be located mid-way between well MW-7 and boring B-1. Please revise your sampling plan in the workplan addendum requested below.

2. Depth-Discrete Groundwater Sampling

Due to historical fluctuation in the depth to groundwater beneath the site, the site lithology, and uncertainty regarding the time of the fuel release, two potential water bearing zones need to be evaluated in each downgradient groundwater sampling location. Depth-discrete groundwater samples from 1) the gravel at approximately 28 ft bgs, and 2) the interval screened by wells MW-5 through MW-8, need to be collected and analyzed. Based on Delta's June 15, 2004 *Quarterly Monitoring Report*, water levels beneath the site appear to have risen to within approximately 25 ft of ground surface. If no groundwater samples can be collected from the

gravel at 28 ft bgs at the time of drilling, soil samples from this zone may be analyzed instead. ACEH requires depth-discrete groundwater sampling with screened intervals of no more than 5 ft. Please revise your sampling plan in the workplan addendum requested below.

3. UST Area Sampling

Since no petroleum hydrocarbons were detected in borings S-A through S-D in 1989, and since the source of the detected lead is presumed to be leaded gasoline formerly stored and dispensed at the site, Delta proposes one additional boring within the former first generation UST cavity to determine if residual petroleum hydrocarbons are present and to vertically evaluate any detected contamination. In addition to the sampling depths proposed by Delta, we request that you collect and analyze a soil sample from within the upper two ft of native soil beneath the former USTs. Also, if contamination is detected during field screening, we request that you drill boring B-2 to depth sufficient to fully define the vertical extent of residual fuel. All soil samples need to be analyzed for TPHg, BTEX, MTBE, 1,2-DCA, EDB and total lead. To assess groundwater near the second generation USTs, we request that a depth-discrete groundwater sample be collected from boring B-2 and analyzed for TPHg, BTEX, MTBE, TBA, TAME, DIPE, ETBE, 1,2-DCA, and EDB. Please revise your sampling plan in the workplan addendum requested below.

4. Soil Excavation and Confirmation Sampling

Delta proposes collecting two sidewall samples and two excavation bottom samples. A minimum of one sidewall sample needs to be collected from each sidewall, at a frequency of at least one sample per 20 ft, and at appropriate depths based on field observations of staining and odor. Field screening of soil samples and excavation oversight by a qualified geologist or environmental engineer are required. Please revise your sampling plan in the workplan addendum requested below.

Cleanup Levels and Goals

We concur with the soil and groundwater cleanup goals proposed by Delta, with the following exceptions. The RWQCB-SFBR ESLs (Interim Final – July 2003) specify an EDB screening level of 0.05 ug/L¹. In addition, 1,2-DCA and EDB are considered potential contaminants of concern, and analysis for these compounds is required. Groundwater in site monitoring wells MW-1 through MW-4 was analyzed for total lead in 1992. No lead was detected in wells MW-1 through MW-3. In well MW-4, 3.3 ug/L total lead was detected; however, no lead was detected in this well during the subsequent sampling event conducted on January 25, 1993. The 1992/1993 analytical laboratory detection limit (3 ug/L) was elevated as compared to the current cleanup goal (2.5 ug/L); however, the lead contamination was considered a low risk groundwater impact and ACEH closed the previous case in 1995. The EPA mandated dramatic reductions in gasoline lead concentrations between 1973 and 1986, and it has been illegal to sell leaded gasoline for use in on-road vehicles since December 31, 1995, so no leaded gasoline is likely to have been stored or dispensed at the site since closure of the previous case. Accordingly, lead is no longer a contaminant of concern in groundwater at the site. Please revise your cleanup goals to include EDB in the workplan addendum requested below.

¹ The July 1995 San Francisco Bay Basin Water Quality Control Plan (the Basin Plan) refers to the RWQCB-CVR report A Compilation of Water Quality Goals (most recent version dated August 2003) as a potential source of current water quality numerical objectives (i.e. cleanup goals); these same figures can be found in the RWQCB-ESLs, Tables F-1a, F-3 and I-1.

6. Data Tabulation and Environmental Screening

We reiterate our request that you prepare summary data tables for soil and groundwater. The tables need to include all data collected at the site following the 1995 closure of the previous case. All detected compounds (including VOCs, SVOCs, metals, etc.) need to be tabulated and compared to the appropriate screening levels. Please submit the requested tables in the workplan addendum requested below.

7. Description of Methods

We request that you describe your proposed methods for sample and field data collection. Methods for groundwater sample collection (Comment 2, above) and field screening during excavation (Comment 4, above) must be detailed. Please refer to State Water Resource Control Board Resolution 92-49 (II, A, 6), Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304 for additional guidance and a list of key workplan elements. According to the SWRCB, "An adequate workplan should include or reference, at least, a comprehensive description of proposed investigative, cleanup, and abatement activities, a sampling and analysis plan, a quality assurance project plan, a health and safety plan, and a commitment to implement the workplan." Please describe your sampling methods and reference your health and safety plan in the workplan addendum requested below.

REPORT REQUEST

Please submit your *Workplan Addendum*, which addresses the comments above by **January 20, 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735 and 7835.1) requires that workplans 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.

Perjury Statement

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UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

AGENCY OVERSIGHT

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Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.

Hazardous Materials Specialist

Cc: Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore,

Livermore, CA 94550

Danielle Stefani, Livermore - Pleasanton Fire Department, 3560 Nevada St., Pleasanton,

CA 94566

Matt Katen, Zone 7 Water District, QIC 80201

Donna Drogos, ACEH Robert W. Schultz, ACEH



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Alamada County

DCT 0 7 2004 Environmental Health

www.deltaenv.com

Letter of Transmitta		
To: Alameda C	County Health Care Ser	vices Agency Date: 10/4/2004
1131 Harbo	or Bay Parkway, Suite	250
Alameda, (California 94502-6577	Job No: SJ31-8LI-1
Attn: Roseanna	Garcia-La Grille	
We are sending the	following items:	
Date	Capies -	Description
28-Sep-04	1	Origional URR form
28-Sep-04	1	Signed copy of URR form
<u></u>		
		<u>-</u>
These are transmitte	vd.	
For your	For action	For review For your X As
Information	specified below	and comment use requested
Remarks		
Per your re	quest, here is a retroac	tive URR form for the Shell station at 318 S. Livermore
Ave in Liv	ermore. Please us kno	w if there are any questions.
	Thank you	,
-		Rebecca Wolff
		Delta Environmental Consultants
		(408) 224-4724
The information contained in t	his transmission is confidential	and only intended for the addressee. If you are not the intended recipient, you are her
that any disclosure, copying, d	istribution or action taken in rel	iance on the contents of this facsimile transmittal is strictly prohibited. If you have re
facsimile in error, please call u	s immediately to arrange for the	return of these documents.



UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT			
EMERGENCY HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? YES NO YES NO		FOR LOCAL AGENCY USE ONLY 1 HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMAL DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE	ATION ACCORDING TO THE BACK PAGE OF THIS FORM:
0 4	17 DATE 9 w 2 d 8 d 0 y 4 y	SIGNED TO THE SIGNED	20/19/04
} 6	NAME OF INDIVIDUAL FILING REPORT PHON KAYEN PETYMA (550) REPRESENTING DAY OWNER/OPERATOR REGIONAL BOARD	·	
неровтер	LOCAL AGENCY OTHER	Shell Oil Products US	
	20945 S. Wilmington Ave.	Cavson CA 904	ATE ZIP PHONE
RESPONSIBLE PARTY	Shell Oil Products US _ unknown	Karen Petryna	19591645-9306
HES!	20945 S. Wilmington Ave. (Carson CA 90610	FATE ZIP
Nort	Shell Station		()
SITE LOCATION	318 S. Livermore Ave. 1	livermore, Alameda	94550 SOUNTY ZIP
	Third Street	CONTACT PERSON	PHONE
	Alameda County Env. Health	Bob Schultz	(510)567-6700
1	San Francisco Bay RWQCB	Betty Graham	(510) G22-240 QUANTITY LOST (GALLONS)
SUBSTANCES	MTBE, BTEX Companio		M UNKNOWN
SUBS	TPH-G	A1-00-1-1	UNKNOWN
/ABATEMENT	ON 9 M LO 80 OV LY TANK TEST TA	ANK REMOVAL SUBSURFACE MONITORING OTHER OTHER	NUISANCE CONDITIONS
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CASE S TYPE (CHECK ONE ONLY	CORROSION UNKNOWN	
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SIAL SIN	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETALS) CAP SITE (CD) EXCAVATE & DISPOSE (ENHANCED BIO DEGRADATION (IT) REPLACE SUPPLY (RS)
REMEDIAL	CONTAINMENT BARRIER (CB) NO ACTION REQUIRED (VACUUM EXTRACT (VE) ✓ OTHER (OT) ✓ OUN ✓ OTHER (OT)		vent soil (vs)
NTS	Initial Detection = MTBE 1.2 Ug/	12 = 9/18/01; Max MTBE +00	late = 6.9 YIL
COMMENTS	Max TPH-0 todate = 260 ug/l; A Max Tolvene todate = 2.6 ug/l; M. Max Total xylenes todate = 16 ug	ax ethylbenzene todate = 2.9	ug/L

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT				
	YES NO RÉPORT BEEN FILED ? YES NO	FOR LOCAL AGENCY USE ONLY HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK	ACCORDING TO THE PAGE OF THIS FORM	
0	4942484044	SGNED	20/19/04 DATE	
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š	Shall Gladen	OPERATOR PHO ())	
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Ö	Third Street		·	
NTING	Alameda County ENV. Health	Bob Schultz 15	NE 10)567-6700	
IMPLEMENTING	Gan Francisco Bay RWQCB	Betty Graham 15	ne 10 1622-2460	
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Ψ.	VACUUM EXTRACT (VE) OTHER (OT) COCKY			
ENTS	Initial Detection = MTBE 1-2 0g/L	= 9/18/01; Max MTBE +0 date × Benzene +0 date = 1.5 Ug/	- 6.7 W/L	
COMMENTS	Max TPH-Co todate = 260 ug/l; Max Max Toluene to date = 2.6 ug/l; Max Max Total xylenes to date = 16 ug/	ethylbenzene todate = 2.9 cg	16	

AGENCY





DAVID J. KEARS, Agency Director

September 27, 2004

Karen Petryna Shell Oil Products US 20945 S. Wilmington Ave. Carson, CA 90810 ENVIRONMENTAL HEALTH SERVICES

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

Subject:

Fuel Leak Case No. RO0002525, Shell #13-5440, Former Service Station at 318

Livermore Avenue, Livermore, California

Dear Ms. Petryna:

Alameda County Environmental Health (ACEH) has reviewed your August 26, 2004 Excavation Work Plan, your May 27, 2003 Site Assessment Work Plan, and the case file for the above-referenced site. Both workplans were prepared by Delta Environmental Consultants, Inc. Please prepare and submit a revised workplan to address the technical comments below.

BACKGROUND INFORMATION

ACEH opened the current case following detection of MTBE in groundwater in September 2001. Up to 140 ug/l TPHg, 6.9 ug/l MTBE, and 3.3 ug/l DIPE have been detected in groundwater, and up to 56 mg/kg Total Oil & Grease, 4.9 mg/kg TPHg, and 380 mg/kg lead have been detected in soil since September 2001. The site was previously investigated under case number RO0000769. ACEH closed that case and issued a Remedial Action Completion Certification on December 8, 1995. Shell continued to operate the site as a service station from 1995 until December 2003 when the UST system was removed. The recent reports do not indicate whether the detected concentrations are related to a pre-1995 release or to a more recent release. In response to the recent detections, the May 27, 2003 workplan proposes no further action with respect to the groundwater contamination, and the August 26, 2004 workplan proposes excavation in the area of a former fuel dispenser. ACEH requests a single revised workplan.

TECHNICAL COMMENTS

1. Groundwater Investigation

MTBE was detected in wells MW-6, MW-7 and MW-8. Since 2001, groundwater flow at the site appears to have varied between westward and southwestward. Wells MW-7 and MW-8 are approximately 75 ft apart, and no investigation has been performed downgradient of the fuel dispensers, toward South Livermore Avenue. Additional lateral definition of groundwater is necessary.

Due to historical groundwater elevation fluctuations, additional vertical definition is also necessary. No groundwater elevation data is available for the site prior to 1989 or for the period between 1995 and 2001. However, the relative groundwater elevation trends (rising or falling)

for the site appear to correlate well with the regional data¹. Continuous regional groundwater elevation data is available from the late 1970s through the present, and historical site groundwater elevations can be inferred from the regional data set.

We are concerned that potentially contaminated water-bearing zones at the site have not been investigated. Because a fuel release occurred at the site, and because groundwater was affected, we require that each potentially contaminated water-bearing zone be investigated. Well MW-6 is screened in clays between 38.5 and 53.5 ft bgs; and wells MW-7 and MW-8 are screened in clays between 36.5 and 51.5 ft bgs. At installation in 2001, the wells were screened across the water table. Deducing site groundwater levels from the regional groundwater elevation data, we find that site groundwater levels were likely 10 to 20 ft higher in the mid to late 1990s than in 2001 when wells MW-5 through MW-8 were installed. Further, based on the regional groundwater elevation data presented in the attached hydrographs, the screening intervals of wells MW-5 through MW-8 appear appropriate for a late 1980s or early 1990s release, but a groundwater impact occurring in the late 1970s through the early 1980s or between 1995 and 2000 likely would have affected shallower groundwater. Significantly, the two to three ft thick gravel layer encountered at approximately 28 ft in wells MW-5 through MW-8 has not been investigated.

We request that your revised workplan propose depth-discrete groundwater sampling in locations immediately downgradient of former potential sources and targeting the appropriate depths. Please provide your rationale supporting horizontal location selection and target depths. We recommend that you consider installing a transect of borings along South Livermore Avenue to address these concerns.

2. Source of Lead in Soil

Elevated lead concentrations have been detected in fuel dispenser sample P-1 (380 mg/kg) and in oil water separator sample SUMP EAST (54 mg/kg). In 1989, up to 550 mg/kg lead, 37,000 mg/kg TPHg, and 320 mg/kg benzene were detected in soil near the fill pipe of the regular leaded gasoline tank. The pre-1989 UST cavity was located near the southern corner of the property, while the 1989 to 2003 UST cavity was located near the eastern corner of the property, away from South Livermore Avenue. Previous case RO0000739 was closed based on ongoing use of the site as a service station. Please identify the likely source(s) of the lead. We request that your revised workplan identify all locations where the lead source(s) were handled or stored, and that you propose excavation and/or sampling where appropriate cleanup goals are exceeded or where no sampling has been performed.

3. Soil Excavation Depth and Confirmation Sampling

Delta proposes excavation of a 200 sq. ft area near sample P-1 to 10 ft bgs. No rationale supporting the lateral or vertical extent of excavation is provided. The deepest lead contamination reported in Table 1 of the August 26, 2004 workplan was at 3.75 ft bgs. Please explain why lead contamination is expected to occur at depths greater than 3.75 ft bgs beneath the former dispenser. Sidewall samples or excavation perimeter samples need to be collected at appropriate depths. Please include a scaled site map showing the proposed excavation area and sampling locations as part of the revised workplan requested below.

¹ Hydrographs for Zone 7 Water Agency shallow-zone observation wells 3S/2E 8K2, 3S/2E 16E 4, and 3S/2E 9Q 4 are attached.

4. Sample Analysis

Based on the current data, ACEH recommends that all samples collected as part of the groundwater investigation be analyzed for TPHg, BTEX, MTBE, TBA, ETBE, DIPE, TAME, 1,2-DCA, EDB and total lead. Presuming that leaded gasoline is the likely source of lead in soil, ACEH will require that all soil excavation confirmation samples be analyzed for TPHg, BTEX, MTBE, 1,2-DCA, EDB and total lead at a minimum.

5. Data Tabulation and Environmental Screening

Please include summary data tables for soil and groundwater in your revised workplan. The tables need to include all data collected at the site following the 1995 closure of the previous case. All detected compounds (including VOCs, SVOCs, metals, etc.) need to be tabulated and compared to the appropriate screening levels. Please select appropriate screening levels for the site, such as the RWQCB-SFBR ESLs or the DTSC PRGs, and justify your selection.

6. Cleanup Goals

The August 26, 2004 workplan proposes to excavate soil from an area where lead concentrations exceeded 150 mg/kg. If 150 mg/kg lead is to be used as the cleanup goal, please present rationale supporting this selection. We request that you identify and propose cleanup goals for all contaminants of concern.

7. Groundwater Monitoring

Please analyze groundwater samples from wells MW-5 through MW-8 for TPHg, BTEX, MTBE, TBA, DIPE, ETBE, TAME, TBA, 1,2-DCA and EDB during the next monitoring event. If results are consistent with the historical findings and lead scavenger results are below the appropriate MCLs, no further monitoring will be necessary and a workplan for well abandonment may be submitted.

REPORT REQUEST

Please submit your *Revised Investigation and Excavation Workplan*, which addresses the comments above by **November 5, 2004**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. CCR Title 23, Sections 2722 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Professional Certification and 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.

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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.

AGENCY OVERSIGHT

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Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.

Hazardous Materials Specialist

attachment: hydrographs

Cc: Chris Davidson, City of Livermore, Economic Development, 1052 S. Livermore,

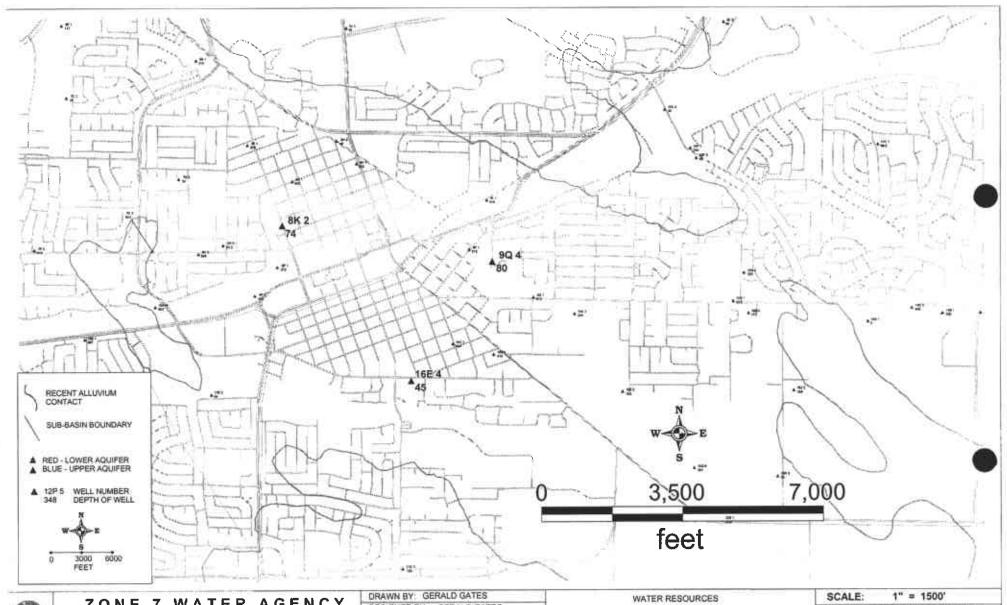
Livermore, CA 94550

Danielle Stefani, Livermore - Pleasanton Fire Department, 3560 Nevada St., Pleasanton,

CA 94566

Matt Katen, Zone 7 Water District, QIC 80201

Donna Drogos, ACEH Robert W. Schultz, ACEH





ZONE 7 WATER AGENCY

5997 PARKSIDE DRIVE, PLEASANTON CA 94588

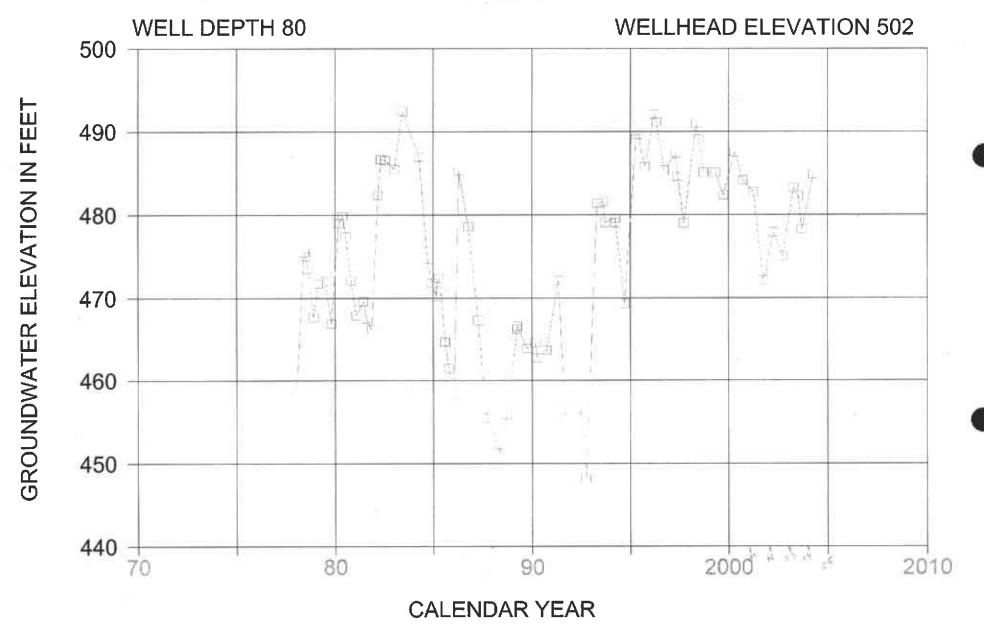
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APPROVED BY:

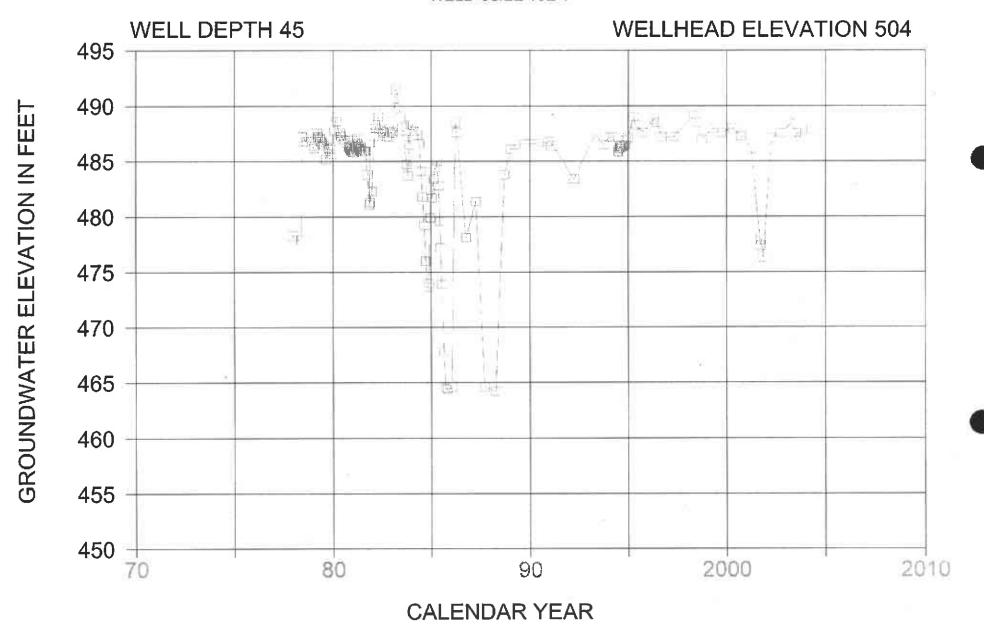
GROUNDWATER MONITORING PROGRAM 2004 WATER YEAR

DATE: 10 SEPTEMBER 2004 FILE NO .: E-WOHITG/FIGWL003WYWGHTHLY WOR

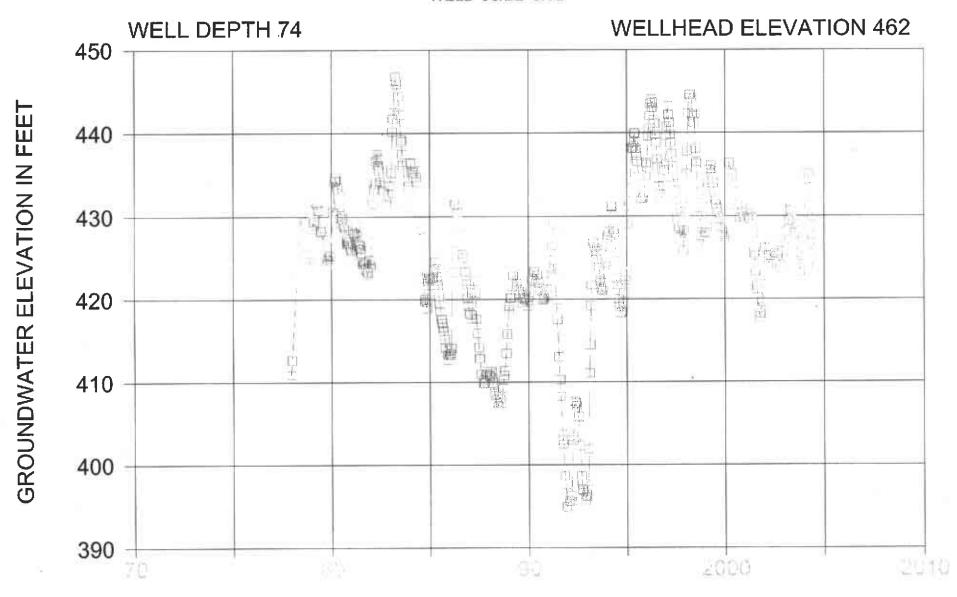
WELL 3S/2E'9Q 4



WELL 3S/2E 16E 4



WELL 3S/2E 8K 2



CALENDAR YEAR

Livermore - Pleasanton



Fire Department

Alamede County

APR 0 -

March 29, 2004

Karen Petryna, Environmental Engineer Shell Oil Products US 20945 South Wilmington Ave. Carson, CA 90810

Re: Former Shell Underground Storage site, 318 S. Livermore Ave., Livermore, Ca 94550, Correction to information provided in Tank Removal Report dated January 16, 2004. Project No. SJ31-8LI-P

Dear Ms. Petryna:

This letter clarifies information reported in and Tank, Piping and Dispenser Removal Report dated January 16, 2004 by Delta Environmental Consultants, Inc.

In page two of this report under Fuel UST Removals, Sampling, and analyses this report states that "Prior to loading the UST's on flat bed trucks for transportation, Mr. Smith required that the UST's be punctured and any residual rinsate be drained into the tank pit excavation."

For the record the tanks were the old style Owens Corning installed in 1990 and contained brine solution in the annular space. The first tank was removed and loaded onto the ECI's truck. While the straps were tightened on the tank a small rupture occurred causing brine solution to begin to leak onto the street. At this point I directed Phil Wright, Field Operations Manager, of Gettler Ryan to empty the brine solution from the interstitial space and limit any fluid from evacuating from the tank enroute to ECI's facility in Richmond. The tank was un-strapped from the truck and suspended over the tank excavation and a couple of holes were bored into the outer wall of the tank to remove the solution. One other tank leaked during the removal and the same procedure was performed prior to loading onto the haulers vehicle. One of the tanks did not leak and was successfully loaded, secured and transported without draining solution.

Please contact me if you have any questions at (925) 454-2339.

Sincerely

Paul M Smith

Hazardous Materials Inspector

Cc:

Perry Pineda, Shell Oil Products US, 1926 Contra Costa Blvd., #166, Pleasant Hill, CA 94523 Dennis Johnson, Shell Oil Products, 15925 Lemolo Shore Dr., Poulsbo, WA 98370 Bill Merchant, Shell Oil Products, 9141 E. Stockton Blvd., Ste 250-321, Elk Grove, CA 95624 Scott Seery, Alameda County Environmental Health, Local Oversight Program, 1131 Harbor Bay Parkway, Alameda, CA 94502

Phil Wright, Gettler Ryan, 6747 Sierra Ct., Suite J, Dublin, CA 94568

Debbie Arnold, Delta Environmental Consultants, Inc, 175 Bernal Rd, Suite 200, San Jose, CA 95119 408-224 - 4724

LOGOUT

UNAUTHORIZED RELEASE FORM WIZARD

-=YOUR URF HAS NOT YET BEEN SUBMITTED TO GEOTRACKER=-CLICK ON "SUBMIT UNAUTHORIZED RELEASE FORM" TO SUBMIT THE URF.

THIS WILL BE YOUR URF TRACKING NUMBER: 5423062980

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE/CONTAMINATION SITE REPORT

REPORT DATE

HAZARDOUS MATERIAL INCIDENT REPORT FILED WITH OES?

03-29-04

I. REPORTED BY -

RESPONSIBLE PARTY CONTACT

CONTACT NAME

INITIALS

ORGANIZATION NAME

EMAIL ADDRESS

KAREN PETRYNA

SHELL OIL PRODUCTS US

ADDRESS P.O. BOX 7869 CONTACT DESCRIPTION

BURBANK, CA 91510-7869

Responsible Party

PHONE TYPE

PHONE NUMBER

EXTENSION

work

(559)-645-9306

II. RESPONSIBLE PARTY -

RESPONSIBLE PARTY CONTACT

CONTACT NAME

INITIALS

EMAIL ADDRESS ORGANIZATION NAME

KAREN PETRYNA

ADDRESS

SHELL OIL PRODUCTS US CONTACT DESCRIPTION

P.O. BOX 7869

BURBANK, CA 91510-7869

Responsible Party

work

PHONE TYPE

PHONE NUMBER (559)-645-9306

EXTENSION

III. SITE LOCATION FACILITY NAME

FACILITY ID

SHELL #13 5440

FACILITY ADDRESS

ORIENTATION OF SITE TO STREET

318 S. LIVERMORE AVE. LIVERMORE, CA 94550

CROSS STREET

ALAMEDA COUNTY

V. SUBSTANCES RELEASED SUBSTANCE RELEASED

DESCRIPTION

QUANTITY LOST

UNKNOWN

VI. DISCOVERY/ABATEMENT

GASOLINE - AUTOMOTIVE

DATE DISCHARGE BEGAN

UNKNOWN

DATE DISCOVERED

HOW DISCOVERED TANK CLOSURE

DESCRIPTION

01-01-04

STUP METHOD

DESCRIPTION

CT

VIL SOURCE/CAUSE

DATE STUPPED

SOURCE OF DISCHARGE

CAUSE OF DISCHARGE

UNK

UNK

DISCHARGE DESCRIPTION

VIII. CASE TYPE CASE TYPE DRINKING WATER AQUIFE	ΕR			
IX. REMEDIAL ACTION				
REMEDIAL ACTION		BEGIN DATE	END DATE	DESCRIPTION
X. GENERAL COMMENTS				
XL CERTIFICATION				
			THE INFORMATION REP TE TO THE BEST OF MY F	
XII. REGULATORY USE ON	NLY			
LOCAL AGENCY CASE NU	<u>IMBER</u>		REGIONAL BOARD	CASE NUMBER
RO0002525				
LOCAL AGENCY - LEAD A	GENCY			
CONTACT NAME	INITI	ALS ORG	SANIZATION_NAME	EMAIL ADDRESS
ROBERT W. SCHULTZ	RWS	ALA	MEDA COUNTY LOP	robert.schultz@acgov.org
ADDRESS CONTACT DESCRIPTION				SCRIPTION
1131 HARBOR BAY PARKWAY Local Agency Caseworker ALAMEDA, CA 94502			Caseworker	
USA				
PHONE TYPE		PHONE NUMBE	R	EXTENSION
direct		(510)-567-6719		
main		(510)-567-6700		
REGIONAL BOARD				
CONTACT NAME	E INITIALS ORGANIZATION NAME		EMAIL ADDRESS	
BETTY GRAHAM	BG SAN FRANCISCO BAY RWQCB (REGION 2)		N 2)	
ADDRESS CONTACT DESCRIPTION				
1515 CLAY ST, STE 1400 OAKLAND, CA 94612				
USA				
PHONE TYPE		PHONE NUMBE	R	EXTENSION
BUSINESS		(510)-622-2358		
< BAC	K		SUBMIT UNAUTI	HORIZED RELEASE FORM

LOGGED IN AS ROSEANNA

LOGOUT

UNAUTHORIZED RELEASE FORM WIZARD

YOUR UNAUTHORIZED RELEASE FORM HAS BEEN SUBMITTED URF CONFIRMATION NUMBER: 5423062980

CLICK HERE TO EDIT THIS CASE IN MANAGE CASES 2.0 CLICK HERE TO CREATE ANOTHER UNAUTHORIZED RELEASE

LOGGED IN AS ROSEANNA

Livermore-Pleasanton Fire Department

3560 Nevada St., Pleasanton, CA 94566

Contaminated Site Case Transfer Form

Site Information

Site Responsible Party(ies)	Shed vil Products US 2255 N. Ontario, Burbank, CA 9150
Site Responsible Party(ies) Phone	Karen Petruna (559) 645-9306
Site Name	Livernize Shell
Site Address	318 S. Livermore Ave Livermore, CA
Site Contractor & Consultant (if available)	KHM Environmental management, 10x 244-4724

Site Conditions

UST		Wat /
Initiating Event	☐ Closure	□ Work on system 🗷 Other Gray Mor
Former Product		14041
Holes, leaks observed	☐ Yes	□ No □ N/A
Contamination observed	☐ Yes	□ No □ N/A
Unauthorized Release Form filed	□ Yes	□ No 10/15 He said ULRing h
Future intended use, if known		piecored
NON-UST		, ,
Former Industrial use?	☐ Yes	□ No
Future intended use, if known		
Type of contamination		

Transferred as:	LOP SLIC	
Level of Update Requested	d: ☐ All meetings ☐ All Documentation ☐ All site visits ☐ Closure sign off ☐ All the above	Fi
Transfer requested by : _	Paul on Ame	(925) 454-2339