Nowell, Keith, Env. Health

From: Schaefer, Peter [pschaefer@craworld.com]
Sent: Tuesday, October 01, 2013 10:50 AM
To: Nowell, Keith, Env. Health
Cc: Cool, Aubrey; marvin.katz@shell.com; Roe, Dilan, Env. Health
Subject: RE: RO2745 - Shell 1601 Webster Street

Keith,

Per our telephone conversation this morning, your request (below) arrived too late for CRA to coordinate a third quarter 2013 groundwater monitoring event. Per your request, we will resume groundwater monitoring in coordination with the adjacent former 76 Station No. 0834 located at 1629 Webster Street, Alameda in first quarter 2014.

I understand that Dilan Roe will be coordinating a meeting with Unocal, Shell, and ACEH to discuss a joint investigation to delineate groundwater impacts and move both sites toward closure.

Regards,

Peter Schaefer
(510) 420-3319

From: Nowell, Keith, Env. Health [mailto:Keith.Nowell@acgov.org]
Sent: Thursday, September 26, 2013 12:20 PM
To: 'marvin.katz@shell.com'; Schaefer, Peter
Cc: Roe, Dilan, Env. Health
Subject: RO2745 - Shell 1601 Webster Street

Dear Mr. Katz and Mr. Schaefer:

Thank you for coming to meet with us on September 19, 2013 at our office to discuss site Shell #13-5032, 1601 Webster Street in Alameda, Alameda County Environmental Health (ACEH) case file # RO0002745. It was a pleasure to put a face to the names ACEH has been working with. Items for discussion included the *Site Conceptual Model and Closure Request* submittal by Conestoga-Rovers & Associates (CRA) dated November 14, 2012 and the ACEH Directive Letter dated August 21, 2013.

Technical Comments

1. **Methyl Tertiary Butyl Ether (MTBE) Groundwater Assessment –**
ACEH's review of the case file indicates a lack of lateral delineation of the MTBE plume in an intermediate groundwater zone at approximately 24- to 28-feet below the ground surface (bgs) in the northeastern site area. ACEH agrees the shallow groundwater zone monitored by the existing well network appears to be delineated and does not need to addressed further. However, an intermediate zone has been identified at 24- to 28-feet below the ground surface (bgs) that is not monitored by the current well network. Please assess the groundwater flow direction for the justification of down gradient boring locations proposed to delineate the leading edge of the MTBE contaminant plume.

    - Please provide proposed locations, and alternate locations should access to the proposed locations be hindered, for the borings used to delineate the MTBE contaminant plume. Ideal boring locations should be located along transects to intercept the plume.

    - Please collect depth-discrete soil and grab groundwater samples at depths above and below the intermediate groundwater depth to demonstrate the contaminant plume resides chiefly within the 24- to 28-foot zone. Include total petroleum hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and xylenes (BTEX), and the fuel oxygenates MTBE, diisopropyl ether

(DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA) in the suite of analytes for both soil and groundwater.

2. TPH/Benzene Assessment –
ACEH's review of the case file indicates elevated benzene concentrations are located in the south-southwestern portion of the site. Please update the Site Conceptual Model (SCM) and consider the variable groundwater flow direction when assessing the distribution of residual TPHg and benzene in groundwater at the site. Please evaluate the immediate risk to sensitive receptors, the existing data to determine if the general and media specific criteria of the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) are met, and whether additional assessment is needed to evaluate data gaps associated with this area of the site.

3. Data Gap Investigation Work Plan and SCM –
Please provide a focused SCM with data gap identification and submit a work plan to address Items 1 and 2. An example of a SCM with data gap identification is provided as an attachment.

4. Groundwater Monitoring –
Please continue to monitor shallow groundwater until the deeper groundwater investigation is complete. Please document activities and findings in a semi-annual groundwater monitoring assessment report in accordance to the schedule provided below. Please continue to coordinate the groundwater monitoring with the former Unocal #0843 site located at 1629 Webster Street in Alameda, CA.

Schedule

Please provide the draft technical report addressing Items 1, 2, and 3, to the attention of Keith Nowell (keith.nowell@acgov.org), cc'ing Dilan Roe (dilan.roe@acgov.org) and upload finalized technical reports (Item 4) to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **November 1, 2013- Draft Work Plan and Site Conceptual Model**
- **November 1, 2013- Semi-annual Groundwater Monitoring Report** - (file name: RO0002745_GWM_R_yyyy-mm-dd)
- **May 16, 2014- Semi-annual Groundwater Monitoring Report** - (file name: RO0002745_GWM_R_yyyy-mm-dd)

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,
Keith Nowell

Keith Nowell PG, CHG
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PDF copies of case files can be reviewed/downloaded at:

http://www.acgov.org/aceh/lop/ust.htm