



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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January 12, 2010

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

Allan A. and Beverly M. Sebanc Trs
2805 Ralston Avenue
Hillsborough, CA 94010-6547

C&H Development Company
3744 Mt. Diablo Blvd.
Lafayette, CA 94549-3694

Subject: Fuel Leak Case No. RO0002971 and Geotracker Global ID T0619714590, Shell, 2301-2307 Lincoln Avenue, Alameda, CA 94502 – Conditional Work Plan Approval

Dear Mr. Brown, C&H Development Company, and Allan A. and Beverly M. Sebanc:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above referenced site including the documents entitled, "*Revised Subsurface Investigation Work Plan*," dated November 23, 2009. The Work Plan, which was prepared by Conestoga-Rovers & Associates on behalf of Shell Oil Products, proposes one off-site soil boring, installation of one additional monitoring well, and installation and sampling of soil vapor probes.

The proposed scope of work is conditionally approved and may be implemented provided that the technical comments below are addressed during implementation of the site investigation. Submittal of a revised Work Plan or Work Plan Addendum is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Off-site Soil Boring B-6.** The proposed location and sampling method for proposed off-site soil boring B-6 is generally acceptable. However, given that the boring is being advanced in an area that is potentially affected by a separate release, we request that you include additional chemical analyses that may help to differentiate the releases. In addition to the proposed analysis for TPHg and BTEX in soil samples, we request that you also include analysis of TPHd and TPHmo using EPA Method 8015, fuel oxygenates including 1,2-dichloroethane and ethylene dibromide using EPA Method 8260B, and lead using EPA Method 6010. In addition to the proposed analysis for TPHg and BTEX, in the grab groundwater sample, we request that you also include analysis of TPHd using EPA Method 8015 and fuel oxygenates including 1,2-dichloroethane and ethylene dibromide using EPA Method 8260B. Please present these results in the Site Investigation Report requested below.
- 2. Proposed Monitoring Well MW-9.** The proposed location for monitoring well MW-9 is acceptable. In addition to the proposed analysis for TPHg and BTEX in soil samples, we request that you also include analysis of TPHd and TPHmo using EPA Method 8015, and lead using EPA Method 6010. Soil samples are to be collected for laboratory analysis from any zones where visible staining, odor, or elevated PID readings are observed. If no visible staining, odor, or elevated PID readings are

observed in the borings, the collection of soil samples for laboratory analysis at depths of 5 and 8 feet bgs is acceptable. Please present soil sampling results in the Site Investigation Report requested below.

3. **Soil Vapor Sampling.** The Work Plan proposes installing soil vapor probes at depths of 2 and 5 feet bgs at locations SVP-4 through SVP-8. Collection of soil vapor samples at depths less than 5 feet bgs is generally not advisable due to the potential effects of breakthrough from ambient air and the effects of temperature and barometric pressure changes. Given these limitations, the results from the deeper soil vapor probes are likely to be of greater value to assess the potential for vapor intrusion. Nevertheless, you may proceed with installing vapor probes at two depths as proposed for comparison purposes. .
4. **Soil Vapor Sampling and Analysis.** We request that all soil vapor samples be analyzed for naphthalene and TPH as gasoline using EPA Method 8260B and not limited to reporting of BTEX. All soil vapor samples are also to be analyzed for oxygen, carbon dioxide, methane, and helium using ASTM D1946. We also request that proposed soil vapor probe SVP-7 be analyzed for a full scan of VOCs including chlorinated solvents due to the proximity to a former oil sump. Please present these results in the Site Investigation Report requested below.
5. **Alternative Screening Levels.** We do not concur with the proposed alternative soil vapor screening levels. The commercial ESL for benzene is $280 \mu\text{g}/\text{m}^3$ and the proposed alternative screening level is $6,800 \mu\text{g}/\text{m}^3$. The alternative screening levels are based on a target risk of 10-05 versus the commercial ESL for soil vapor which uses a target risk of 10-06 and target hazard quotient of 0.2. The commercial ESLs incorporate these factors in part to account for cumulative risk. The commercial ESLs are to be used for screening purposes.
6. **Groundwater Monitoring.** Groundwater monitoring is to be conducted on a semiannual basis with sampling conducted during the second and fourth quarters. Please include analyses for TPHd and TPHmo using EPA Method 8015 during the second quarter 2010 semiannual sampling event. If TPHd and TPHmo are not detected at concentrations greater than 210 micrograms per liter ($\mu\text{g}/\text{L}$) in any groundwater samples collected, analysis for TPHd and TPH mo may be discontinued..

TECHNICAL REPORT REQUEST

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

- **May 21, 2010** – Site Investigation Report
- **July 22, 2010** – Second Quarter 2010 Groundwater Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible

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party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

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

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

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AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Peter Schaefer, Conestoga-Rovers & Associates, 5900 Hollis Street, Suite A
Emeryville, CA 94608 (*Sent via E-mail to: pschaefer@croworld.com*)

Jake Torrens, Geomatrix, 2101 Webster Street, 12th Floor, Oakland, CA 94612-3066 (*Sent via E-mail to: jtorrens@geomatrix.com*)

Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Jerry Wickham, ACEH
Geotracker, File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
 - Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for**.

- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO# use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.