

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY  
ALEX BRISCOE, Acting Director



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November 17, 2009

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

Subject: Fuel Leak Case No. RO0002985 and Geotracker Global ID T10000000423, Shell #16-5112, 4895 Hacienda Drive, Dublin, CA 94568 – Conditional Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site, including the recent work plan entitled, "*Soil and Groundwater Investigation Work Plan, Shell-branded Service Station, 4895 Hacienda Drive, Dublin, California,*" dated September 28, 2009. The September 28, 2009 Work Plan proposes the installation of monitoring wells at six locations across the site.

Four soil borings were advanced at the site on August 20, 2008 as part of a Phase II Environmental Site Assessment. Soil samples from two of the four soil borings contained MTBE at concentrations up to 0.073 milligrams per kilogram. Groundwater samples were collected from two of the four soil borings. Total petroleum hydrocarbons as gasoline (TPHg) were detected in one of the two groundwater samples at a concentration of 320 micrograms per liter ( $\mu\text{g/L}$ ). MTBE was detected in both groundwater samples at concentrations of 2.3 and 370  $\mu\text{g/L}$ . The source of the TPHg and MTBE is unknown. The September 28, 2009 Work Plan proposes the installation of monitoring wells at six locations across the site.

Four of the six proposed well locations are outside the general area of the suspected sources, the dispensers, piping, and USTs. Therefore, it is likely that an additional phase of investigation will be required to define the nature and extent of contamination using sampling locations that are more proximal to the suspected sources of contamination. However, we do not object to the proposed scope of work as an initial phase of investigation to assess general site conditions.

The proposed scope of work is conditionally approved and may be implemented provided that the technical comments below are addressed during the proposed field 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 comment 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. **Proposed Well Locations.** The proposed well locations are generally acceptable; however, we request one modification to the proposed well locations as shown on the attached figure entitled, "Modified Site Plan." We request that well MW-3 be moved to a location that is more likely to be downgradient from the fuel system. Please present the soil boring logs, well completion diagrams, screening results, and analytical results from the wells in the Well Installation and Destruction Report requested below.

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](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

#### 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.

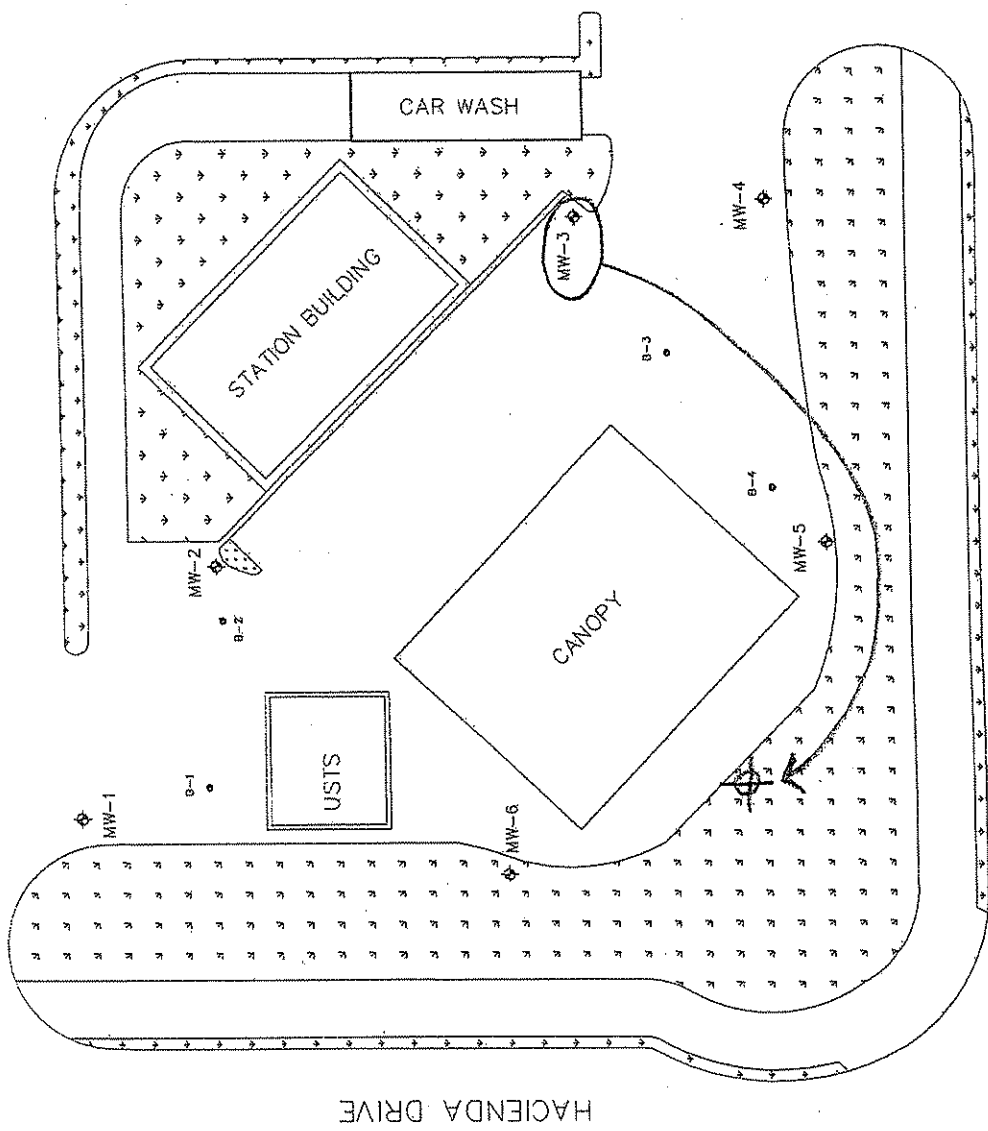
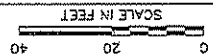
#### UNDERGROUND STORAGE TANK CLEANUP FUND

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.

#### 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.

PROJECT NUMBER	SCA4895H1
DRAWN BY	AD
CHECKED BY	SEP 7, 2009
APPROVED BY	



**LEGEND**

- SOIL BORING (AUGUST 20, 2009)
- ◆ PROPOSED GROUNDWATER MONITORING WELL LOCATION AND DESIGNATION

**DELTA CONSULTANTS**

SHELL OIL PRODUCTS US  
SHELL SERVICE STATION  
CAPITOLA, CALIFORNIA

FIGURE 2

SITE MAP  
4895 HACIENDA DRIVE  
DUBLIN, CALIFORNIA

Attachment: Modified Site Plan