

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0367

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

August 29, 2006

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

Subject: Fuel Leak Case No. RO0000367, Shell#13-6019, 1784 150th Avenue, Oakland, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the documents entitled, "First Quarter 2006 Monitoring Report," dated May 1, 2006 and "Subsurface Investigation Report," dated July 26, 2006, and "Underground Storage Tank Removal Report," dated August 4, 2006. The "First Quarter 2006 Monitoring Report," presents the results of ongoing quarterly groundwater monitoring and groundwater extraction from well MW-11. The "Subsurface Investigation Report," presents the results of on and off-site soil and groundwater sampling conducted in May 2006. The "Underground Storage Tank Removal Report," presents results from the removal of a 550-gallon waste oil tank.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Waste Oil Tank.** Based on the results presented in the "Underground Storage Tank Removal Report," dated August 4, 2006, we concur that no further investigation is required for waste oil constituents.
2. **Hydrogeologic Cross Sections.** Three cross sections were previously presented in the Soil and Water Investigation Report dated August 28, 2003. Please update and expand cross sections A-A' (extending from MW-1 to MW-9) and C-C' (extending from MW-5 to MW-10) to include the information collected during more recent investigations and depict analytical results for soil and groundwater samples. Please revise the cross sections to incorporate data from recent soil borings that depict the lateral and vertical extent of soil layers encountered, the location of the tank pit, where groundwater was first encountered in borings and the static water levels, screen intervals for monitoring wells and grab groundwater samples, observations of free product, staining, and odor, and analytical results for soil and groundwater samples. Please present the cross sections in the Quarterly Monitoring Report for the Third Quarter 2006 requested below.

3. **Sampling Results for Wells MW-12 and MW-13.** Analytical data for wells MW-12 and MW-13 were not available for the "Subsurface Investigation Report," dated July 26, 2006. Please include wells MW-12 and MW-13 in ongoing quarterly monitoring. The results are to be presented in the quarterly monitoring reports requested below.
4. **Recommendations for Future Actions at Site.** Following the review of groundwater sampling data from newly installed wells MW-12 and MW-13 as well as previous results and the Site Conceptual Model (October 11, 2005), please present recommendations for future actions at the site. These recommendations are to be presented in the Quarterly Monitoring Report for the Third Quarter 2006.

TECHNICAL REPORT REQUEST

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

- **September 15, 2006** – Quarterly Monitoring Report for the Second Quarter 2006
- **November 15, 2006** – Quarterly Monitoring Report for the Third Quarter 2006 including Hydrogeologic Cross Sections and Recommendations
- **February 15, 2007** – Quarterly Monitoring Report for the Fourth Quarter 2006
- **July 11, 2006** – Subsurface Investigation 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 party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, 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.

UNDERGROUND STORAGE TANK CLEANUP FUND

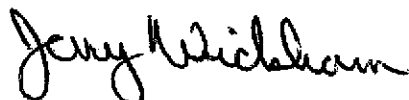
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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
Hazardous Materials Specialist

Denis Brown
August 29, 2006
Page 4

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ana Friel
Cambria Environmental Technology, Inc.
270 Perkins Street
Sonoma, CA 95476

Aubrey Cool
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 2005
	REVISION DATE: May 31, 2006
	PREVIOUS REVISIONS: October 31, 2005, December 16, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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: **ftp Site Coordinator**.
 - 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 at 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)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
03-07-06

ENVIRONMENTAL HEALTH SERVICES

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

March 3, 2006

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

Subject: Fuel Leak Case No. RO0000367, Shell#13-6019, 1784 150th Avenue, Oakland, CA –
Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Subsurface Investigation Work Plan," dated January 9, 2006. A work plan amendment, consisting of a revised map and "Standard Field Procedures for Installing Monitoring Wells," was received by electronic mail on February 28, 2006 and March 1, 2006. Five on-site borings (SB-19 through SB-23) are proposed to investigate the horizontal and vertical extent of fuel hydrocarbons in soil. Two off-site borings (SB-24 and SB-25) are proposed to investigate the horizontal and vertical extent of fuel hydrocarbons in soil and groundwater within the upper 35 feet. ACEH concurs with the proposed scope of work provided that the technical comment 1 below is addressed during the field investigation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Shallow Monitoring Wells.** Shallow monitoring wells to monitor a clayey gravel layer typically encountered between approximately 20 and 25 feet below ground surface (bgs) are to be installed at selected boring locations. ACEH requests that shallow monitoring wells be installed at proposed boring locations SB-20, SB-22, SB-24, and SB-25.
2. **Volatile Organic Compounds in Shallow Soil and Groundwater.** Benzene and other volatile organic compounds have previously been detected at elevated concentrations in soil, soil vapor, and groundwater at various sampling locations across the site. If benzene or other VOCs are detected in soil or groundwater samples collected from the proposed soil and groundwater sampling locations at concentrations that exceed applicable screening levels for potential indoor vapor intrusion, additional soil vapor sampling will be required. Please evaluate the potential for indoor vapor intrusion at the site and off-site locations and present recommendations regarding soil vapor sampling in the Subsurface Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **May 1, 2006** – Quarterly Monitoring Report for the First Quarter 2006
- **July 11, 2006** – Subsurface Investigation 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 party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

Denis Brown
March 3, 2006
Page 3

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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UNDERGROUND STORAGE TANK CLEANUP FUND

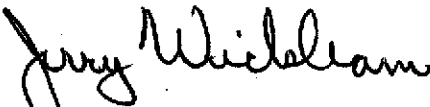
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Gibbs
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
10-27-05

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

October 26, 2005

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

Subject: Fuel Leak Case No. RO0000367, Shell#13-6019, 1784 150th Avenue, Oakland, CA –
Request for Work Plan

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Site Conceptual Model," dated October 11, 2005. The Site Conceptual Model (SCM) summarizes the site background, history, geology, hydrogeology, and investigation results to date for the site. The SCM also presents conclusions and recommendations for future actions. ACEH requests that you prepare a work plan to implement the recommended data collection activities identified in the SCM and the technical comments below.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Groundwater Monitoring.** ACEH concurs with the recommendation to continue groundwater monitoring. Please present your results in the quarterly groundwater monitoring reports requested below.
2. **Continued Groundwater Extraction from Well MW-11.** ACEH concurs with the recommendation to continue groundwater extraction from well MW-11. Please summarize the groundwater extraction activities in the quarterly monitoring reports requested below.
3. **Boring Installation and Grab Groundwater Sample Collection.** ACEH concurs with the recommendation to install a boring and collect grab groundwater samples adjacent to monitoring well MW-9 to evaluate the differences in results between SB-14 and MW-9. However, we request that the soil boring and grab groundwater sampling be continued down to the total depth of MW-9, which is 35 feet below ground surface (bgs), rather than 22 feet bgs. The purpose of extending the boring to 35 feet bgs is to assess the concentration of fuel hydrocarbons in the lower water-bearing layer in which well MW-9 is screened.

4. **Additional Sampling in Source Areas.** ACEH concurs with the recommendation to conduct additional lateral and vertical definition of contamination in assumed source areas. Please propose sampling activities to achieve improved lateral and vertical definition of contamination in the Work Plan requested below.
5. **Corrective Action Plan.** ACEH concurs with the recommendation to complete a corrective action plan. Please propose a schedule for completing the corrective action plan in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **January 13, 2006** – Work Plan
- **February 1, 2006** - Quarterly Monitoring Report for the Fourth Quarter 2005
- **May 1, 2006** – Quarterly Monitoring Report for the First 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 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

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PERJURY STATEMENT

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"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

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UNDERGROUND STORAGE TANK CLEANUP FUND

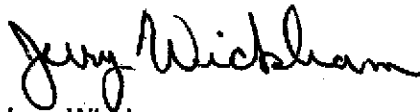
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: David Gibbs, Cambria Environmental Technology, Inc., 5900 Hollis Street, Suite A,
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
7-25-05

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

July 21, 2005

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

Subject: Fuel Leak Case No. RO0000367, Shell#13-6019, 1784 150th Avenue, Oakland, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the documents entitled, "Interim Remediation Report," dated June 23, 2005, "First Quarter 2005 Monitoring Report," dated June 9, 2005, and "Dispenser and Piping Upgrade Sampling Report," dated June 1, 2005. All reports were prepared on your behalf by Cambria Environmental Technology, Inc. The "Interim Remediation Report" presents the results of dual phase extraction conducted temporarily at the site in November 2004. The report also recommends the preparation of a site conceptual model (SCM). Preparation of a SCM was also discussed during a meeting between Shell, Cambria, and ACEH conducted on June 8, 2005. ACEH encourages the use of an electronic SCM format. Please contact me to obtain examples of an electronic SCM format, if needed.

The "First Quarter 2005 Monitoring Report" presents the results of groundwater sampling conducted in March 2005. ACEH is concerned that elevated concentrations of total petroleum hydrocarbons (TPHg) continue to be detected off-site.

Please address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Preparation of Site Conceptual Model.** ACEH concurs with the recommendation to prepare a site conceptual model (SCM). The SCM for this project is to incorporate, but not be limited to, the following:
 - A. A concise narrative discussion of the regional geologic and hydrogeologic setting. Include a list of technical references you reviewed.
 - B. A concise discussion of the on-site and off-site geology, hydrogeology, release source and history, secondary source areas, remediation status, risk assessment, plume migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient receptors. The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site, including potential vertical hydraulic gradients.
 - C. Local and regional maps showing location of sources, extent of soil and groundwater contamination for appropriate depth intervals (i.e., an interpretive drawings and isoconcentration maps—not a plot of laboratory results), rose diagram of recent and

historical groundwater gradients, and locations of receptors. "Receptors" include, but are not limited to, all supply wells and surface water bodies within 2,000 feet of the source area, and all potentially impacted schools, hospitals, daycare facilities, residences, and other areas of heightened concern for vapor impact.

- D. Geologic cross-sections (parallel and perpendicular to the contaminant plume axis) which include subsurface geologic features, depth to groundwater, man-made conduits, soil boring and sampling locations, monitoring well construction, and an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results).
 - E. Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements.
 - F. Exposure evaluation flowchart (similar to Figure 2 in ASTM's Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites) and/or a graphical SCM (similar to Figure 1 in the Central Valley Regional Water Quality Control Board's Appendix A – Reports, Tri - Regional Board Staff Recommendations For Preliminary Investigation And Evaluation Of Underground Tank Sites, 16 April 2004).
 - G. Plots of chemical concentrations vs. time and vs. distance from the source. Plots should be shown for each monitoring well, which has had detectable levels of contaminants.
 - H. Summary tables of chemical concentrations in each historically sampled media (including soil, groundwater and soil vapor).
 - I. Boring and well logs (including construction/screening), and a summary table indicating construction specifications for each monitoring and extraction well.
 - J. Identification and listing of specific data gaps that require further investigation during subsequent phases of work.
 - K. Proposed activities to investigate and fill data gaps identified above.
2. **Interim Remediation.** Operation of the temporary groundwater extraction system has apparently been discontinued due to permitting issues. ACEH requests that interim remediation using groundwater extraction be continued for the site. Please include plans to implement interim remediation or verification that interim remediation has been implemented with the SCM requested below.
 3. **Evidence of Potential Multiple Releases.** This site was initially investigated due to a petroleum release that was discovered in 1986. During recent upgrade activities, total petroleum hydrocarbons as gasoline (TPHg) were detected in 11 soil samples at concentrations up to 4,100 mg/kg. Therefore, the effects of potential for multiple releases are to be included in the SCM. Specifically, the adequacy of existing site data to evaluate contaminant distribution from multiple releases and recent releases is to be considered.
 4. **Hydraulic Gradient.** The hydraulic gradient for the site has appeared to vary between southeast and northwest as shown on the rose diagram on Figure 2 of the First Quarter 2005 Monitoring Report and based on review of previous groundwater elevation contour maps. Groundwater elevations measured in well MW-6 appear to be have been excluded as anomalous data during some events but included in evaluating groundwater elevations in historic events. The groundwater elevations in well MW-6 should be consistently excluded in

assessing the direction of the hydraulic gradient due to the significant variations in groundwater elevations that occur in this well. Therefore, please correct the rose diagram that will appear on future groundwater elevation contour maps to exclude the effects from well MW-6 on historic hydraulic gradients. However, the SCM is to include consideration of possible effects of groundwater monitoring in the area of well MW-6 on contaminant movement.

5. **Well MW-9.** TPHg was detected at a concentration of 67,000 µg/L in a grab groundwater sample collected from boring SB-14 in June 2003. Boring SB-14 is located approximately 25 feet from well MW-9. In contrast, TPHg was detected at a concentration of 100 µg/L in the groundwater sample collected from well MW-9 during the most recent March 2005 monitoring event. This distinct difference in water quality results is to be evaluated in the SCM requested below. Please develop working hypothesis that can be tested by data collection to evaluate groundwater quality off-site in the area of well MW-9.

TECHNICAL REPORT REQUEST

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

- **September 1, 2005** - Quarterly Report for the Second Quarter 2005
- **September 21** – Site Conceptual Model with Plan to Implement Interim Remediation
- **December 1, 2005** – Quarterly Report for the Third Quarter 2005
- **March 1, 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 evaluations and/or judgments be performed under the direction of an appropriately registered or

Mr. Denis Brown
July 21, 2005
Page 4

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

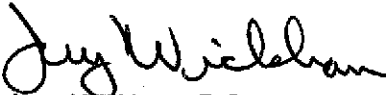
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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: David Gibbs
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-08-03

RO0000367

September 17, 2003

Ms. Karen Petryna
Shell Oil Products US
P.O. Box 7869
Burbank, CA 91510-7869

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

RE: Work Proposal Approval for 1784 150th Ave, San Leandro, CA

Dear Ms. Petryna:

I have completed review of Cambria Environmental Technology, Inc's August 10, 2003 *Soil and Water Investigation Work Plan* report prepared for the above referenced site. This report documented the advancement of seven soil borings to better define the extent of the contaminant plume off-site to the west and northwest of the site, and to determine the best locations and well screen intervals for additional monitoring wells.

Based on the data collected from this phase of investigation, Cambria proposed to install two additional monitoring wells, MW-9 and MW-10, and to install two soil borings, SB-17 and SB-18. And wells MW-7 and MW-8, which were paved over, will be uncover and made accessible for sampling. Cambria's proposal is acceptable.

However, I do not concur that a shorter-screened well is not necessary near MW-2. The boring log for well MW-2 indicates there is 30% fine to coarse sand from 20 feet bgs with gravel to 1" at 25 feet bgs, yet the well is screened from 25 to 45 feet bgs. Please installed another well adjacent to MW-2, but screened from approximately 15 to 25 feet bgs. Too long a screen interval will diluted water samples and may not be representative of groundwater quality. Field work should commence within 45 days of the date of this letter, or by November 10, 2003. Please provide 72 hours advance notice of field activities.

At this time, you may decrease the sampling frequency of well MW-3 from a quarterly to an annual basis. Groundwater sampling should occur in the first quarter of each year.

If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

email: Melody Munz, Cambria
c: Donna Drogos

shell(150Ave)-2

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



05-06-03

RO0000367

May 5, 2003

Ms. Karen Petryna
Shell Oil Products US
P.O. Box 7869
Burbank, CA 91510-7869

ENVIRONMENTAL HEALTH SERVICES

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

RE: Work Plan Approval for 1784 150th Ave, San Leandro, CA

Dear Ms. Petryna:

I have completed review of Cambria Environmental Technology, Inc's March 10, 2003 *Soil and Water Investigation Work Plan and Well Screen Interval Evaluation* report prepared for the above referenced site. Cambria proposed to advance a total of six Geoprobe® soil borings to define the extent of the chemical plume west and northwest of the site. The work plan is acceptable with the following additions/changes:

- Soil samples should also be collected from changes in lithology for field screening, and possibly for laboratory analysis.
- Each boring should be advanced below first encountered water to at least 40 feet bgs to delineate the vertical extent of soil/water contamination. Select soil samples below groundwater elevation should also be submitted for laboratory analysis.
- Two additional borings are recommended; one approximately 25 feet northwest of SVS-9 (on 150th Ave) and another near BH-5 (on Portofino Circle).

If you concur with the above, please acknowledge. Field work should commence within 60 days of the date of this letter, or by July 7, 2003. An investigation report (that is due 60 days upon completion of field activities) should include geologic cross-sections. Based on site lithology and other site data, a determination will be made if a well with a shorter screen interval is required near well MW-2.

Please provide 72 hours advance notice of field activities. If you have any questions, I can be reached at (510) 567-6762 or by email at echu@co.alameda.ca.us.

eva chu
Hazardous Materials Specialist

email: Melody Munz, Cambria
c: Donna Drogos

shell(150Ave)-1

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-20-02

December 19, 2002

RO 367

Ms. Karen Petryna
Shell Oil Products US
P.O. Box 7869
Burbank, CA 91510-7869

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

RE: Shell Station, 1784 – 150th Avenue, San Leandro - Request for Soil and Water Investigation Workplan

Dear Ms. Petryna:

The case file for the referenced site was recently reviewed, up to and including the November 18, 2002 Cambria Environmental Technology report documenting the completion of wells MW-7 and MW-8, and soil boring SB-9, in locations directly across 150th Avenue from the subject site.

These locations are adjacent to the rear yards of a housing development located on Portofino Drive and Portofino Court.

Groundwater samples collected at the time of boring advancement revealed elevated concentrations of fuel hydrocarbons in each sampling location. Up to 2200 micrograms per liter (ug/l) of Benzene and 83,000 ug/l Total Petroleum Hydrocarbons as Gasoline (TPH-G), among other fuel constituents present, were identified in water sampled from SB-9 and MW-8, respectively. The extent of the release from the subject site has not yet been adequately defined within the referenced housing development, as well as northeast of MW-7, towards Freedom Avenue.

Please direct your consultant to prepare a workplan for the next phase of the continuing Soil and Water Investigation (SWI). The scope of this SWI workplan must include, at a minimum, investigation of Portofino Drive and Portofino Circle, and up 150th Avenue towards Freedom Avenue. You may decide to address this phase of work in a two-pronged approach, using push-tool technology to advance temporary sampling points first, followed by the installation of permanent monitoring wells.

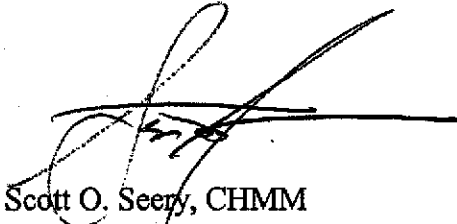
This workplan shall also present a plan to evaluate, and replace where necessary, any excessively long-screened wells (>10' lengths) that were installed in years past in critical locations, but which now do not appear to meet current standards for appropriate construction of wells meant to assess fuel releases.

The cited SWI workplan is due within 60 days of the date of this letter, and shall be submitted under Shell Products US cover.

Ms. Karen Petryna
Re: 1784 - 150th Ave., San Leandro
December 19, 2002
Page 2 of 2

Thank you in advance for the submittal of the requested workplan. Please contact me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Roger Brewer, RWQCB
Robert Weston, ACDEH
Melody Munz, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-23-02

October 22, 2002

RO 367

Ms. Karen Petryna
Shell Oil Products US
P.O. Box 7869
Burbank, CA 91510-7869

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

RE: Shell Station, 1784 – 150th Avenue, San Leandro - Request for Total Fuel Oxygenate Analyses

Dear Ms. Petryna:

The case file for the referenced site was recently reviewed, up to and including the September 2002 Cambria Environmental Technology second quarter 2002 monitoring report. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the various wells within the network. Our review revealed that a number of potential fuel oxygenates may not have been sought historically from samples collected from these wells.

Please direct your consultant to analyze all samples collected during the next scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) and lead scavengers (EDB and 1,2-DCA / EDC) using EPA Method 8260. Such expanded analyses may be required to continue depending upon what is found.

In addition, you are reminded that all reports for this case, *as well as all other Shell Oil Products US cases*, are to be submitted under Shell Oil Products US cover that is signed, under penalty of perjury, by the official Shell Oil Products US project representative.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Robert Weston, ACDEH
Jacquelyn Jones, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608



October 24, 2001

STID 4110 / PR0501256

Bruce Marubashi
Equilon Enterprises, LLC
3468 Claremont
Modesto, CA 95350

Bhushan Bansal
Bayview Shell
1784 - 150th Avenue
San Leandro, CA 94578

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

FINAL NOTICE OF VIOLATION

Re: Inspection of Shell Station, 1784 - 150th Avenue, San Leandro

Dear Messrs. Marubashi and Bansal:

As you are aware, a regulatory compliance inspection was performed at the subject facility on July 31, 2001. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

In follow-up to this inspection, a Notice of Violation was issued by this office dated August 2, 2001. This Notice requested that specific steps be followed to bring your facility into compliance, and requested that you submit a *Corrective Action Plan* (CAP) that addressed each of the items articulated in the Notice. The Notice requested the following items:

- Complete and submit updated UST Registration Forms
- Correct the operation and maintenance problems identified during the 7/31/00 inspection
- Ensure adherence to the UST operating permit and permit conditions (partial)
- Maintain copies of up-to-date employee training, monitoring system annual certification, and monthly tank and line leak detector tests, among others required, at the site at all times

This office is in receipt of Equilon's letter dated August 30, 2001. This letter constitutes Equilon's contribution to the CAP, and addresses many, but not all, of the requested items expected to be addressed in a comprehensive CAP. Only the first two of the noted items were addressed completely by Equilon. We understand that that dealer, Mr. Bansal, was expected by Equilon to respond to the remaining items. This has not occurred.

Consequently, you continue to operate your USTs in violation of your permit.



October 24, 2001

STID 4110 / PR0501256

Bruce Marubashi
Equilon Enterprises, LLC
3468 Claremont
Modesto, CA 95350

Bhushan Bansal
Bayview Shell
1784 - 150th Avenue
San Leandro, CA 94578

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

FINAL NOTICE OF VIOLATION

Re: Inspection of Shell Station, 1784 - 150th Avenue, San Leandro

Dear Messrs. Marubashi and Bansal:

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Consequently, you continue to operate your USTs in violation of your permit.

Messrs. Marubashi and Bansal
Re: 1784-150th Ave., San Leandro
October 24, 2001
Page 2 of 2

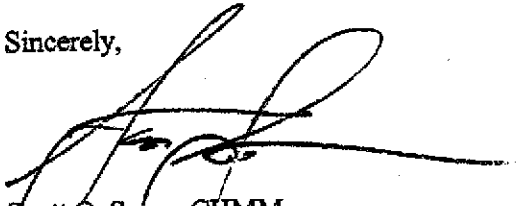
Please be advised that your permit to operate will be revoked on November 7, 2001 unless the outstanding compliance issues have been adequately addressed to the satisfaction of this office.

Permit revocation will require that your USTs be immediately voided of all product, electrical connections severed, and all dispensers secured.

Please be further advised that operation of the USTs after November 7, 2001 absent receipt of a *Return to Compliance Notice* issued from this office will constitute a violation of provisions of HSC Chapter 6.7, and 23CCR, resulting in the referral of your case to the Alameda County District Attorney's Office for civil prosecution.

Please contact me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Susan Torrence, Alameda County District Attorney's Office
Robert Weston, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



8-28-01

20367

August 28, 2001

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

STID 768

Ms. Karen Petryna
Equiva Services LLC
P.O. Box 7869
Burbank, CA 91510-7869

RE: SHELL STATION, 1784 - 150TH AVENUE, SAN LEANDRO

Dear Ms. Petryna:

The July 31, 2001 Cambria Environmental Technology, Inc. (Cambria) *Offsite Monitoring Well Installation Work Plan* for the continued assessment of the underground storage tank release at the subject site has been reviewed. This work plan calls for the installation of two new wells (designated MW-5 and MW-6), one of which (MW-6) will be completed within the adjoining townhouse development located directly south of the site.

The revised work plan is accepted with the following condition:

- Sampling of completed wells shall not occur any sooner than 24 hours following well development, no matter what development technique is employed.

We expect that this workplan will be implemented within 45 days.

Please contact me at (510) 567-6783 when field work has been scheduled.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Chuck Headlee, RWQCB
Melody Munz, Cambria Env. Technology, Inc., 1144-65th St., Oakland, CA 94608



8-04-01

August 2, 2001

STID 4110 / PR0501256

Bruce Marubashi
Equilon Enterprises, LLC
3468 Claremont
Modesto, CA 95350

Bhushan Bansal
Bayview Shell
1784 - 150th Avenue
San Leandro, CA 94578

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

NOTICE OF VIOLATION

Re: Inspection of Shell Station, 1784 - 150th Avenue, San Leandro

Dear Messrs. Marubashi and Bansal:

A regulatory compliance inspection was performed at the subject facility on July 31, 2001. A representative of Service Station Systems, Inc. facilitated the inspection. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- 87 and 91 product fill risers were missing '98 UST compliance upgrade tags
- 91 product (non-remote) fill and vapor riser caps were found to be bad and replaced by the contractor
- 89 product remote fill riser cap was found to be bad and replaced by the contractor
- Both remote vapor riser spill buckets were filled with water
- Water was present in all fill sumps
- All fill and vapor bucket manway rubber interface gaskets were missing
- All STP sumps had accumulated dirt and debris
- A leaky union was observed on the 89 product line within the STP sump
- All dispenser containment pans were dirty
- A leaky coupler was observed beneath the 91 product line under dispenser #3/4
- Overspill bucket of the used oil tank was filled with oil
- Employee training records were not up to date
- Current UST permit was not available at the site at the time of the inspection
- Monthly PLLD test reports indicate periodic back-and-forth reliance on monthly 0.2 gph tests and annual 0.1 gph tests. The UST permit calls for monthly 0.2 gph tests, only.

Messrs. Marubashi and Bansal
Re: 1784-150th Ave., San Leandro
August 2, 2001
Page 2 of 3

Violations of provisions of HSC have been identified, as follows:

- HSC Sec. 25293 – The operator of the underground tank system shall monitor the tank system using the method specified on the permit for the tank system. Records of monitoring.....shall be kept in sufficient detail to enable the local agency to determine whether the underground tank system is in compliance with the applicable provisions of [HSC Chapter 6.7], the regulations....., and the permit issued for the operation of the tank system.

Records documenting product line tests revealed a failure to adhere to those specified in the UST permit (monthly at 0.2 gph). Dispensing of used oil into the used oil tank was not in accordance to permit conditions i.e., was not visually monitored to ensure oil went into the drop tube of the tank. Employee training records were not current. These are violation of the permit to operate the tanks at this site.

Please be advised that HSC Sec. 25299(a) provides for civil liabilities imposed on the tank operator of up to \$5000 per tank per day per violation for:

- (2) Violation of any applicable requirement of the permit
- (3) Failure to maintain records
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

Please be further advised that HSC Sec. 25299(b)) provides for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

- (4) Knowing failure to take reasonable and necessary steps to assure compliance with HSC Chapter 6.7 by the operator
- (5) Violation of any applicable requirement of the permit
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

At this time, Equilon and the operator are required to correct the tank system operation and maintenance, and facility management issues identified in this inspection report, namely:

- Complete and submit the attached updated UST Registration Forms
- Correct the operation and maintenance problems identified during the 7/31/00 inspection
- Ensure adherence to the UST operating permit and permit conditions
- Maintain copies of up-to-date employee training, monitoring system annual certification, and monthly tank and line leak detector tests, among others required, at the site at all times

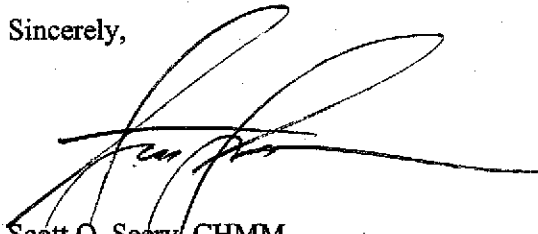
Messrs. Marubashi and Bansal
Re: 1784-150th Ave., San Leandro
August 2, 2001
Page 3 of 3

Pursuant to HSC Sec. 25288(d), you required to submit a *Plan of Correction* **within 60 days**. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so. We will expect that accompanying this plan will be the updated UST Registration Forms. In addition, if Equilon would prefer to modify their current permit to allow for annual 0.1 gph PLLD tests in lieu of the 0.2 gph monthly test specified on the permit, you should request this in writing so that the permit can be modified.

You must certify, once all the necessary repairs and other tasks have been completed, that the tank systems are in full compliance with HSC Chapter 6.7 and UST regulations. We recommend, therefore, that you employ your own inspectors and engineers to ensure that this requirement is met, and to provide the appropriate level of quality control you will likely need to make this certification.

Please contact me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments (Equilon, only)

cc: Susan Torrence, Alameda County District Attorney's Office
Robert Weston, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



06-19-01

R0367

June 18, 2001

STID 768

Ms. Karen Petryna
Equiva Services LLC
P.O. Box 7869
Burbank, CA 91510-7869

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

RE: SHELL STATION, 1784 - 150TH AVENUE, SAN LEANDRO

Dear Ms. Petryna:

This letter is sent in follow-up to a recent meeting with Mr. Chuck Headlee, California Regional Water Quality Control Board, San Francisco Bay region (RWQCB). This meeting was convened to discuss the results of the historic, multi-phase environmental investigations associated with the fuel release(s) at the subject site. Topics of our discussion included the results of the Tier II Risk-Based Corrective Action (RBCA) evaluation and the Corrective Action Plan (CAP) reported and proposed, respectively, by your consultant, Cambria Environmental Technology, Inc. (Cambria), in their September 17, 1999 RBCA report.

The RWQCB and this office have determined that additional wells are necessary to properly define the extent of the dissolved gasoline plume, and to monitor long-term plume stability. At a minimum at this time, one well is required in the area of previously-proposed well MW-7, and another well is required in the area of soil vapor sample points SVS-15/16. The latter well location is within the townhouse development that adjoins the subject site to the south.

At this time, please have your consultant prepare and submit a workplan for the referenced well installations. This workplan is due with 45 days of the date of this letter.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Stephan Bork, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



PO 367, PO 495
PO 2744, PO 254
PO 2745, PO 242

July 13, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Aura Mattis
HS & E Representative
Shell Oil Products
P. O. Box 8080
Martinez CA 94553

Subject: Request for underground storage tank leak detection records for first half of calendar year 1999

Dear Ms. Mattis:

The underground storage tanks (USTs) on the attached list are single wall fiberglass tanks. These tanks are required to be monitored for leaks using an automatic tank gauge. The automatic tank gauge shall test the tank at least once per month after product delivery or when the tank is filled to within 10 % of the highest operating level during the previous month and shall be capable of detecting a release of 0.2 gallon per hour.

This is a formal request for copies of the data from those monthly tests. Please submit all test data for the months of January, February, March, April, May and June of 1999. The reports shall include the calculated leak rate and leak threshold for the automatic tank gauge systems installed after January 1, 1995. Data for all USTs at each site shall be submitted within 10 days of this letter.

Additionally, a year end summary is required to be submitted no later than January 30, 2000.

If you have any questions regarding this letter please contact me at (510) 567-6781.

Sincerely,

Robert Weston
Sr. Hazardous Materials Specialist

enclosure

c: Tom Peacock, ACDEP

Shell Stations with Single Wall Fiberglass USTs

Alcosta Shell 8999 San Ramon Road Dublin CA 94568

Bay Super Shell 1800 Powell Street Emeryville CA 94608

Alameda Shell 1601 Webster Street Alameda CA 94501

Bayview Shell 1784 150th Avenue San Leandro CA 94578

Piedmont Shell 29 Wildwood Avenue Piedmont CA 94610

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0367

May 4, 1999

STID 768

Ms. Karen Petryna
Equiva Services LLC
Science & Engineering, West Coast
P.O. Box 6249
Carson, CA 90749-6249

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

RE: Shell Service Station, 1784-150th Avenue, San Leandro

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Ms. Petryna:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 1784-150th Ave., San Leandro

May 4, 1999

Page 2 of 2

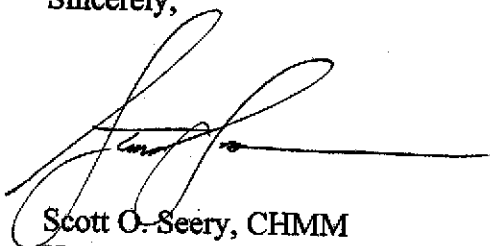
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#367

November 9, 1998

ENVIRONMENTAL HEALTH SERVICES

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

STID 768

Ms. Karen Petryna
Equiva Services LLC
P.O. Box 6249
Carson, CA 90749-6249

RE: SHELL STATION, 1784 - 150TH AVENUE, SAN LEANDRO

Dear Ms. Petryna:

I have reviewed the September 30, 1998 Cambria Environmental Technology, Inc. (Cambria) *Subsurface Investigation Work Plan* for the continued assessment of the subject site. This work plan was subsequently revised November 5, 1998 following a conversation I shared with Cambria's Darryk Ataide on October 23, 1998.

Among other topics, the revised work plan calls for the installation of six (6) Geoprobe borings from which soil, soil gas, and water samples will be collected for specific laboratory analyses. These data will aid in the interpretation of theoretical risk to nearby potential receptor populations. Three (3) of the six borings will be emplaced adjacent to previous borings SVS-2, -3, and -4. The remaining three borings will be emplaced within the adjoining townhouse complex, directly west of the site. Three (3) new wells are also proposed. Two of the 3 (MW-5 and -6) are slated for a first quarter 1999 installation. The revised Cambria work plan indicates the installation of the third well, MW-7, is contingent upon the results of the analyses of water samples collected from Geoprobe borings SVS-14 and -15.

The revised work plan is accepted with the following condition:

- The installation of well MW-7 will be determined after contemplation of the results of the pending phase of work at the site.

I understand fieldwork will begin on Tuesday, November 10, 1998. Please contact me at (510) 567-6783 should this schedule change.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

Ms. Karen Petryna
RE: 1784 - 150th Ave., San Leandro
November 9, 1998
Page 2 of 2

c: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Darryk Ataide, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 367

May 18, 1998

ENVIRONMENTAL HEALTH SERVICES

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

STID 768

Mr. Alex Perez
Shell Oil Products Company
P.O. Box 8080
Martinez, CA 94553

RE: SHELL STATION, 1784 - 150TH AVENUE, SAN LEANDRO

Dear Mr. Perez:

I have reviewed the May 1, 1998 Cambria Environmental Technology, Inc. (CETI) correspondence which presents a summary of our April 28, 1998 meeting, as well as a corrective action work plan addendum. CETI's summary addresses several points we discussed during the April meeting. A more complete response or interpretation is expected for several of these issues once each is further evaluated by CETI, additional calculations are completed, and/or additional field data are collected.

One area of discussion was not addressed, however: the need to perform an additional round of soil vapor collection in an attempt to corroborate the initial soil vapor study (SVS) data. A proposal and schedule for this work should be presented.

The cited work plan addendum supplements the January 9, 1998 CETI Corrective Action Plan (CAP) by proposing three additional "borings" within the townhome development located southwest of the subject Shell site. These additional borings will be advanced using hydraulic push technology, e.g., GeoProbe, CPT, etc., and are intended to assess underlying geology and ground water impact.

I understand that an interpretation of potential preferential vapor flow through geogenic or utility conduits will be presented following completion of the borings within the adjoining townhome development. After completion of the second phase of the SVS and any RBCA evaluations, revisions, or recalculations that may consequently follow, a final corrective action plan (CAP) can then be determined.

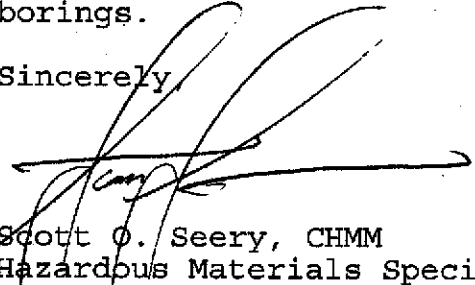
The cited CETI work plan addendum is accepted.

Mr. Alex Perez
RE: 1784 150th Ave., San Leandro
May 18, 1998
page 2 of 2

Please submit a SVS work plan for review. As this work should occur soon after cessation of the rainy season, this work plan should be submitted in a timely fashion.

Please call me at (510) 567-6783 should you have questions or comments. Please also keep this office apprised of your success at gaining off-site access for installation of the additional borings.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Scott MacLeod, Cambria Environmental Technology, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Ro# 367

April 10, 1998

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

STID 768

Mr. Alex Perez
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL STATION, 1784 - 150TH AVENUE, SAN LEANDRO

Dear Mr. Perez:

I have reviewed the January 9, 1998 Cambria Environmental Technology, Inc. *Corrective Action Plan (CAP)*, and the April 21, 1997 Weiss Associates *Tier 2 RBCA Site Evaluation* submitted as Attachment A of the cited Cambria report. These documents were received by this office on January 14, 1998.

I would like to schedule a meeting to discuss the scope of both the RBCA and proposed CAP. I will call you the week of April 12 to schedule a meeting sometime this month.

I may be reached at (510) 567-6783 should you have any questions in the meantime.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Dick Pantages, Chief, Environmental Protection
Chuck Hedley, RWQCB
Tom Fojut, Weiss Associates
Khaled B. Rahman, Cambria Environmental Technology, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DATE: 1 YEAR

RO# 367

December 2, 1997

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
TEL: 567-6711
FAX: 567-1171

STID 768

Mr. Alex Perez
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL STATION, 1784 - 150TH AVENUE, SAN LEANDRO

Dear Mr. Perez:

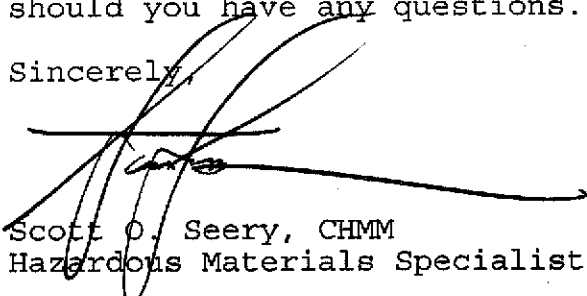
After review of the January 14, 1997 Weiss Associates (WA) report entitled "Soil Vapor Survey Report," I spoke with Mr. Steve Long of WA on February 28, 1997. We discussed certain issues associated with the soil vapor collection field work documented in the referenced report, among other related topics. I was informed during this conversation that a draft RBCA had been submitted to Shell for review just days prior.

On August 21, 1997, I was contacted by Mr. Scott MacLeod of Cambria Environmental Technology, Inc. (CETI) regarding CETI's pending Corrective Action Plan (CAP) proposal for this site that they were at that time reportedly preparing for Shell. Mr. MacLeod and I discussed the need for additional assessment and permanent well points within the adjoining townhome development, among other issues relating to the risk-based CAP.

To date, I have not received a copy of either the RBCA or CAP, in draft or final form.

Please submit these documents to my attention within 30 days of the date of this letter. I may be reached at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Kevin Graves, RWQCB
Larry Blazer, Alameda County District Attorney's Office
Amir Gholami, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO# 367

RAFAT A. SHAHID, Director

February 14, 1997

STID 768

DEPARTMENT OF ENVIRONMENTAL HEALTH
Environmental Protection Division
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577
(510) 567-6700

Aura B. Mattis
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL STATION, 1784 150TH AVENUE, SAN LEANDRO

Dear Ms. Mattis:

Thank you for meeting me at the site today to confirm the presence of overspill buckets on the fuel underground storage tanks (UST). Although our records, including the most recent (March 1995) UST Permit Application A and B forms, do not indicate that such buckets are installed on the subject tanks, our inspection today confirms that they are, in fact, present.

Each of the three (3) fuel tanks appear to have both delivery and vapor overspill buckets (approximately 15 and 5 gallon capacities, respectively) installed over the north (fill) end of each tank. In addition, the two outboard tanks also appear to employ "remote" fill and vapor buckets which are clustered adjacent to the central tank's standard fill/vapor buckets. These remote buckets appear to only be 5 gallon in capacity. As we discussed, these are too small to be acceptable to this agency.

At this time, please comply with the following points:

- 1) Abate use of and render unusable the noted "remote" fill locations for the two outboard USTs unless the capacity of the delivery overspill basins are increased in capacity to a minimum of 15 gallons. Should Shell decide to modify the capacity of the remote fill buckets, appropriate tank modification plans are to be submitted to this agency for approval.
- 2) Submit "as built" plans for the overspill bucket installations, and indicate the date that this work was completed.
- 3) Submit updated UST Permit Application A and B forms (copies attached) to correctly reflect spill and overflow protection status.

Ms. Mattis
RE: 1784 150th Avenue, San Leandro
February 14, 1997
Page 2 of 2

- 4) Confirm the presence or absence of "striker plates" beneath the access ports of the single wall Owens-Corning FRP product tanks.
- 5) Submit an update to the site HMBP to appropriately reflect the presence of overspill protection.

Please continue to ensure that the station dealer strictly adheres to all UST operating permit *and reporting* conditions specified in the permit issued June 1995. Failure of the dealer to adhere to permit conditions in the future may result in enforcement action, which could include the revocation of his permit.

As you requested, attached is a copy of the November 1990 agency memo which discusses the need to employ 15 gallon or greater capacity overspill buckets.

Please call me at (510) 567-6783 should you have any questions about the content of this letter. Compliance questions, as well submittal of your response to the items requested above, should be directed to Amir Gholami of this office. Mr. Gholami's phone number is (510) 567-6876.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

enclosures

cc: Mee Ling Tung, Agency Director
Gordon Coleman, Acting Chief, Environmental Protection
Amir Gholami, ACDEH
Kevin Tinsley, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#367

December 4, 1996

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

STID 768

Mr. Jeff Granberry
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL STATION, 1784 150TH AVENUE, SAN LEANDRO

Dear Mr. Granberry:

This letter follows our telephone conversation today. As we discussed, both product sheen and/or measurable free phase product has appeared in wells MW-1 and MW-3 for at least the last year. The source of this product is unknown at this time. A sample of the product was reportedly collected from MW-1 during March 1996 and sent to Shell's Westhollow laboratory for analysis. This office was advised that the results of this analysis was to have been presented in the 2nd quarter 1996 sampling report. To date, these data have not been presented.

In an attempt to determine whether the discovery of free phase product in site wells was related to underground storage tank (UST) operational failures, I contacted Shell's "compliance" office and requested copies of all UST monitoring records for the last year. This request would encompass all records which demonstrate the scope and results of tank monitoring (e.g., integrity tests, manual or electronic tank level monitoring, SIR, etc.). Confirmation of the presence or absence of overfill protection measures and devices was also requested. To date, these data have also not been presented.

Please submit the aforementioned information within 30 days of the date of this letter. Please be advised that this letter constitutes an official request to furnish information pursuant to California Health and Safety Code Section 25299.78(b).

You may reach me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

Mr. Granberry
RE: 1784 150th Ave., San Leandro
December 4, 1996
Page 2 of 2

CC: Mee Ling Tung, Director, Environmental Protection
Bob Chambers, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Amir Gholami, ACDEH
Kevin Tinsley, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro#367
ARNOLD PERKINS, DIRECTOR
RAFAT A. SHAHID, DEPUTY DIRECTOR

January 24, 1996

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

STID 768

Mr. Jeff Granberry
Shell Oil Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL SERVICE STATION, 1784-150TH AVENUE, SAN LEANDRO -
REQUEST FOR ADDENDUM TO PROPOSED SOIL VAPOR SURVEY IN
PREPARATION OF A RISK-BASED CORRECTIVE ACTION ANALYSIS

Dear Mr. Granberry:

As we recently discussed, I have completed a review of the December 19, 1995 Weiss Associates (WA) *Proposed Corrective Action Plan* in which a soil vapor survey (SVS) is proposed. WA informs that these data are necessary to evaluate potential exposure scenarios as a preliminary step in completion of a risk-based corrective action (RBCA) analysis.

In order for this author to understand how data derived from such a SVS will assist in the RBCA analysis, please present a comprehensive discussion describing, among other topics, the extrapolation of SVS data to plausible exposure scenarios for potential receptors in, for example, the residences adjoining the subject site. In addition, please also present specific information regarding the actual SVS, and why the proposed hardware or techniques were selected over others. Examples of SVS tasks for which additional information is required:

- o sampling techniques
 - * ground probes (large- or small-volume)
 - * surface flux chambers
 - * sorbent samplers (e.g., Petrex tubes)
 - * etc.

- o sample collection
 - * canisters
 - * Tedlar bags
 - * etc.

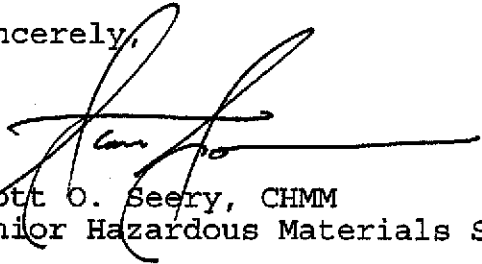
- o analysis methodology

- o sampling QA/QC plans

Mr. Jeff Granberry
RE: 1784 150th Ave., San Leandro
January 25, 1996
Page 2 of 2

Thank you in advance for the requested supplemental information.
Should you have any questions, please contact me at 510/567-6783.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

a
cc: Jun Makishima, Acting Director
Gil Jensen, Alameda County District Attorney's Office
Ravi Arulanantham, RWQCB
Jim Ferdinand, Alameda County Fire Department
Tom Fojut, Weiss Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

STID 768

October 20, 1995

Mr. Dan Kirk
Shell Oil Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL STATION, 1784 150th AVENUE, SAN LEANDRO

Dear Mr. Kirk:

I have completed a review of the case file for this site, up to and including the June 13, 1995 Weiss Associates (WA) *Subsurface Investigation Report and First Quarter 1995 Monitoring Results* and July 28, 1995 WA 2nd quarter 1995 sampling report. The June 13, 1995 WA report documents the results of the phased off-site assessment using Geprobe "push tool" sampling techniques, followed by the installation of well MW-4.

At this time, pursuant to Section 2720 et seq. of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations (CCR), please prepare and submit a CAP which presents an evaluation of the CAP elements required under this article.

Please be advised that, based on the historically high dissolved concentrations of benzene detected in ground water sampled from well MW-2 ($\leq 36,000$ ug/l), similar benzene concentrations in ground water sampled from off-site Geoprobe point BH-3 (25,000 ug/l), and the immediate proximity of residences to the site and, specifically, the noted sample points, an evaluation of the human health risk posed by the release at this site must be completed. The final CAP shall incorporate risk-based corrective action.

The requested CAP is due within 60 days of the date of this letter, or by December 20, 1995.

Please call me at 510/567-6783 should there be any questions or if I may be of assistance.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

Dan Kirk
RE: 1784 150th Ave., San Leandro
October 20, 1995
Page 2 of 2

cc: Jun Makishima, Acting Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ravi Arulanantham, RWQCB
Jim Ferdinand, Alameda County Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, Assistant Agency Director

STID 768

November 16, 1994

Mr. Dan Kirk
Shell Oil Company
P.O. Box 5278
San Ramon, CA 94520

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

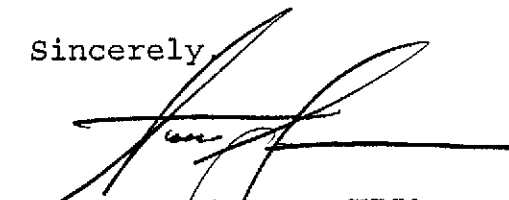
RE: SHELL STATION, 1784-150TH AVENUE, SAN LEANDRO

Dear Mr. Kirk:

I have completed review of the November 8, 1994 Weiss Associates (WA) subsurface investigation work plan for the placement of three (3) additional "hydropunch" survey points. Following consultation with Mr. Tom Howard of WA, this work plan has been approved as submitted.

Please contact me at 510/567-6783, or -6700, when field activities associated with this current phase of work have been scheduled.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Rob Weston, ACDEH
James W. Carmody, Weiss Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, Assistant Agency Director

SECOND MAILING

STID 768

November 16, 1994

Mr. Dan Kirk
Shell Oil Company
P.O. Box 4023
Concord, CA 94524

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320


RE: SHELL STATION, 1784-150TH AVENUE, SAN LEANDRO

Dear Mr. Kirk:

I have completed review of the November 8, 1994 Weiss Associates (WA) subsurface investigation work plan for the placement of three (3) additional "hydropunch" survey points. Following consultation with Mr. Tom Howard of WA, this work plan has been approved as submitted.

Please contact me at 510/567-6783, or -6700, when field activities associated with this current phase of work have been scheduled.

Sincerely



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Rob Weston, ACDEH
James W. Carmody, Weiss Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, Assistant Agency Director

STID 768

October 24, 1994

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
DIV. OF ENVIRONMENTAL PROTECTION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

Mr. Dan Kirk
Shell Oil Company
P.O. Box 5278
San Ramon, CA 94520

RE: SHELL STATION, 1784-150TH AVENUE, SAN LEANDRO

Dear Mr. Kirk:

I have completed review of the October 13, 1994 Weiss Associates (WA) subsurface investigation report documenting the results of the qualitative "hydropunch" survey. It is reported that initial field indications did not suggest that there was any impact to ground water encountered in borings BH-2 and -3. However, fuel constituents were discovered in both, with up to 25,000 ppb benzene, among other constituents, in water sampled from BH-3.

WA has recommended another hydropunch survey prior to siting monitoring wells. This appears to be a sound recommendation.

Please have your consultant prepare and submit a brief work plan presenting the locations of proposed survey points. Please submit this hydropunch survey work plan within 30 days of the date of this letter.

Please contact me at 510/567-6783, or -6700, should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Rob Weston, ACDEH
James W. Carmody, Weiss Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

[REDACTED]
STID 768

October 24, 1994

Mr. Dan Kirk
Shell Oil Company

[REDACTED] 4524

RE: SHELL STATION, 1784-150TH AVENUE, SAN LEANDRO

Dear Mr. Kirk:

I have completed review of the October 13, 1994 Weiss Associates (WA) subsurface investigation report documenting the results of the qualitative "hydropunch" survey. It is reported that initial field indications did not suggest that there was any impact to ground water encountered in borings BH-2 and -3. However, fuel constituents were discovered in both, with up to 25,000 ppb benzene, among other constituents, in water sampled from BH-3.

WA has recommended another hydropunch survey prior to siting monitoring wells. This appears to be a sound recommendation.

Please have your consultant prepare and submit a brief work plan presenting the locations of proposed survey points. Please submit this hydropunch survey work plan within 30 days of the date of this letter.

Please contact me at 510/567-6783, or -6700, should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Rob Weston, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director
STID 768

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0367

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

Mr. Dan Kirk
Shell Oil Company
P.O. Box 5278
San Ramon, CA 94520

RE: SHELL STATION, 1784-150TH AVENUE, SAN LEANDRO

Dear Mr. Kirk:

I have completed review of the December 7, 1993 Weiss Associates (WA) work plan for further assessment of the fuel hydrocarbon impact in shallow ground water on and adjacent to the subject site. The cited WA plan proposes to advance eight soil borings in five locations, both on- and off-site, from which "grab" water samples will be collected using the "hydropunch" method.

We understand that this phase of the assessment is designed to provide a qualitative indication of water quality to aid in the siting of an appropriate array of permanent monitoring wells. With this understanding in mind, this work plan has been accepted with the following clarifications:

- 1) Water samples collected from each of the borings are to be analyzed for the presence of TPH-G, BTEX, and halogenated hydrocarbons.
- 2) Soil samples should be collected from each boring at 5 foot intervals, significant changes in lithology, or where contamination is noted in the field, at a minimum. Boring logs should be generated. Subjective or quantitative field screening should be used to determine which soil samples to analyze, if any. Target analytes shall be the same as for water samples. Particular attention should be paid to materials encountered in those borings advanced on-site (Area B).
- 3) A proposal for permanent well locations should be submitted with the report documenting this phase of the investigation.

Please call me at 510/271-4530 to inform me of when field work is slated to begin.

Sincerely,


Scott C. Seery, CHMM
Senior Hazardous Materials Specialist

Mr. Dan Kirk
RE: 1784-150th Avenue, San Leandro
January 13, 1994
Page 2 of 2

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Scott MacLeod, Weiss Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

STID 768

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

October 26, 1993

Mr. Dan Kirk
Shell Oil Company
P.O. Box 5278
San Ramon, CA 94520

RE: SHELL STATION, 1784-150TH AVENUE, SAN LEANDRO

Dear Mr. Kirk:

I have recently completed a review of the underground storage tank (UST) leak file for this site. This task included the review of monitoring and assessment reports dated up to, and including, the October 15, 1993 Weiss Associates (WA) report documenting the results of the 1993 third quarter monitoring event.

Ground water sampling results indicate all on-site wells have been impacted by fuel hydrocarbons. Ground water sampled from well MW-2, located northwest and adjacent to the UST cluster, has consistently exhibited the highest concentrations of fuel compounds, as compared to wells MW-1 and -3. The calculated gradient at this site has essentially been stagnant from September 1992 through September 1993. Gradients ranged from approximately 0.0001 to 0.008 ft.ft.⁻¹ during this period. An exception to this apparent gradient trend was noted for the February 1993 monitoring event, however, which was calculated to be 0.07 ft.ft.⁻¹, with flow towards the south. There is a strong indication that contaminants have migrated off-site.

The RWQCB and Article 11 of Title 23 Waters, California Code of Regulations (CCR), require additional assessment of sites where the initial stages have identified contamination, but not its extent. Such is the case at this site. Therefore, pursuant to Section 2724 of Article 11, 23CCR, you are required to perform additional investigations in the form of a **Soil and Water Investigation (SWI)**.

A SWI work plan must be developed and submitted to this office for review. Please submit this work plan within 45 days of the date of this letter, or by December 10, 1993. All reports and proposals must be submitted under seal of an California-registered civil engineer or geologist.

Dan Kirk
RE: 1784-150th Ave., San Leandro
October 26, 1993
Page 2 of 2

Please contact me at 510/271-4530 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Jim Ferdinand, Alameda County Fire Department
Scott MacLeod, Weiss Associates
files

Weiss Assoc
5500 Shellmound St
Emeryville
94608-2411

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, Assistant Agency Director

May 17, 1993

Mr. Raymond Malgradi
2035 47th Avenue
Oakland, CA 94601

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

Subject: Complaint of improper disposal of radiator coolant,
Shallos Bayfair Shell, 1784 150th Avenue, San Leandro

Dear Mr. Malgradi:

Thank you for your telephone call on May 13, 1993 regarding the complaint you filed. I visited the Shell station today and spoke to Bhushan Bansal, the owner.

A hazardous waste generator inspection was performed and I have included copies for your records. Mr. Bansal denied that radiator coolant was poured into the sewer grate in the service bay. He stated that the rust stains on the floor were there when he took over the business. He further stated that radiator coolant is recycled by Antifreeze Environmental Services and that the waste container is almost full of spent coolant.

As a follow-up I discussed the proper disposal of spent radiator coolant during my inspection.

Hopefully this addresses your concern about this businesses practice of improper disposal of a hazardous waste. If you have any further questions related to this matter please contact me.

Sincerely,

Robert Weston
Hazardous Materials Specialist

cc: file

enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

STID 768

August 17, 1992

Mr. Kurt Miller
Shell Oil Company
P.O. Box 5278
Concord, CA 94520

RE: SHELL SERVICE STATION, 1784 150TH AVENUE, SAN LEANDRO

Dear Mr. Miller:

This letter follows in the wake of my telephone conversations with Messrs. Tom Fojut and Scott MacLeod of Weiss Associates (WA) on August 12 and 13, 1992. These calls were prompted by my review of the April 27, 29 and July 20, 1992 WA reports. We discussed the distribution of contamination across the site, potential source or sources, well construction criteria for MW-2, and sampling and monitoring schedules, among others.

I brought to their attention that this Department had required that all new wells (i.e., MW-2 and -3) be sampled monthly for the first quarter, reevaluating this schedule after the data is reviewed. Further, the ground water elevations in all wells were also to be measured monthly for 12 consecutive months, reduced to a quarterly schedule thereafter. Neither of these schedules have been adhered to.

These sampling and monitoring requirements were initially memorialized in correspondence dated August 22, 1991 to Mr. Jack Bradstad of Shell. The January 10, 1992 letter addressed to you, stating our acceptance of the WA work plan, referenced the need to adhere to the requirements outlined previously in the referenced August 22, 1991 correspondence. Copies of both letters are enclosed.

This Shell site, adjacent to and above the entrenched Highway 580, and in a region whose hydrogeology is likely influenced by the mechanics of the Hayward Fault Zone, may prove a challenge to understand. Therefore, in addition to immediately instituting a schedule of monthly water elevation measurements for the next 12 months, beginning August 1992, and presenting such water elevation data on water elevation contour maps in the appropriate quarterly reports, the following tasks are to be completed:

- 1) **Construct geologic cross sections from boring log data.** Data generated from each future well installation shall be incorporated into a new series of cross sections;

Mr. Kurt Miller
RE: Shell Station, 1784 150th Ave. San Leandro
August 17, 1992
Page 2 of 2

- 2) Each report is to provide an interpretation of data collected and any recommended future actions;
- 3) Contaminant plume maps are to be generated for each target compound of concern (e.g., TPH, BTEX, 1,2-DCA, etc.).

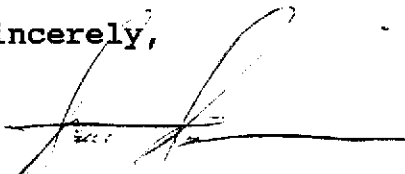
The Department recognizes that this site appears to have experienced releases from both the fuel and waste oil underground storage tank (UST) systems, as evidenced by the elevated levels of fuel and solvent compounds found in ground water sampled from downgradient well MW-2. For example, up to 30,000 ppb benzene and 82 ppb 1,2-DCA was found during the first quarter sampling event.

Please be advised that Shell, pursuant to the requirements set forth under Article 11 of Title 23, California Code of Regulations, should begin developing a **Corrective Action Plan (CAP)** to address the further assessment and cleanup of soil and ground water contamination at this site. Controlling the off-site migration of contaminant plumes should be the first priority.

Please be further advised that this is an official request for technical reports pursuant to California Water Code Section 13267(b). Failure to respond or a late response could result in the referral of this case to the RWQCB or District Attorney's Office for enforcement action.

Please feel free to call me at 510/271-4530 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

enclosures

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health
Gil Jensen, Alameda County District Attorney's Office
Rich Hiatt, RWQCB
Jim Ferdinand, Eden/Castro Valley Consolidated Fire Dist.
Scott MacLeod, Weiss Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0367

RAFAT A. SHAHID, Assistant Agency Director

January 10, 1992

DEPARTMENT OF ENVIRONMENTAL HEALTH
80 Swan Way, Rm. 210
Oakland, CA 94621
(415) 271-4300

Mr. Kurt Miller
Shell Oil Company
P.O. Box 5278
Concord, CA 94520

RE: SHELL SERVICE STATION, 1784-150TH AVENUE, SAN LEANDRO
LOP CASE # 768

Dear Mr. Miller:

This Department is in receipt and has completed review of the December 30, 1991 Weiss Associates (WA) addendum to their September 23, 1991 work plan which proposes the scope of the required additional environmental work at the referenced site. This work plan, as amended, has been accepted, with the following conditions:

- 1) The Site Safety Plan must reflect 29 CFR Part 1910.120 required elements.
- 2) Well purging adequacy should be verified by the apparent stabilization of pH, temperature, and conductance measurements.

Please follow the reporting and sampling frequencies outlined in the August 22, 1991 correspondence from this office. If you so choose, you may include the results of this additional work in the 1992 first quarter report, due May 1st, as opposed to issuing a separate document.

Please call me at 510/271-4320 should you have any questions.

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DTSC
Jim Ferdinand, Eden Consolidated Fire District
Joseph Theisen, Weiss Associates

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R036f

December 26, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH (3)
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Mr. Kurt Miller
Shell Oil Company
Environmental Engineering Division
P.O. Box 5278
Concord, CA 94520

RE: CAL-EPA REGIONAL HYDROGEOLOGY AND CONTAMINATION STUDY, CENTRAL
SAN LEANDRO

Dear Mr. Miller:

The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substance Control (DTSC), has been investigating the presence of several priority pollutants, primarily volatile organic compounds (VOC), heavy metals, and nitrates, in soil and ground water occurring in the central San Leandro area since approximately 1986. Currently, six sites are being investigated with Cal-EPA lead or oversight, as follows:

- o 139th Avenue site (Cal-EPA lead)
- o Factor Avenue site (Cal-EPA lead)
- o Singer-Friden site (Cal-EPA lead)
- o Caterpillar site (Cal-EPA oversight)
- o Hudson ICS (Cal-EPA oversight)
- o Staefa Control System Inc./2481 Washington Avenue (Cal-EPA oversight)

Because of similar contamination found at these sites, DTSC suspects that a larger, regional contamination problem exists that requires further investigation. Presently, DTSC is conducting a Regional Hydrology and Contamination Study in Central San Leandro. The purposes of this study include, among other elements:

- o defining as far as possible the known vertical and horizontal extent of contamination in the area;
- o identifying existing public and/or private wells that can be used by DTSC for monitoring purposes;
- o instituting coordinated sampling; and,
- o defining the hydrogeology of the area.

Mr. Miller
RE: Cal-EPA VOC Study
December 26, 1991
Page 2 of 3

The intent of the DTSC study is to develop the best possible data on the extent of contamination while realizing no unnecessary expenditure of public funds. Following the presentation of the study's final report, DTSC will develop a work plan for conducting further study, targeting potential source areas and "hot spots" identified during the course of this phase of the investigation.

The DTSC has requested Alameda County's assistance in developing this study and report by coordinating ground water sampling efforts for those sites under county lead. To meet this goal, you are requested, on a volunteer basis, to supplement the sampling slated to occur at your site(s), listed below, during **January - March 1992**, in addition to those sampling/monitoring activities already required, as follows:

- 1) Collect and analyze ground water samples from at least one well for VOCs (EPA Method 624, or 601/602). The well sampled for this task is to be chosen based upon its potential for detection of VOCs relative to other wells on-site, i.e., its proximity downgradient of a former waste oil or solvent underground storage tank, VOCs identified in prior analyses, etc.
- 2) Present this data, along with other requisite sampling/monitoring data, in the 1992 first quarter report. Submit a copy of this report directly to the DTSC, at the following address:

California Environmental Protection Agency
Department of Toxic Substance Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710
Attn: Eileen Hughes

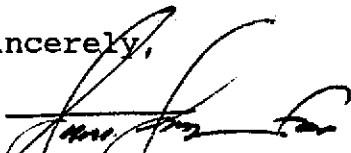
The sites affected by this request are as follow:

- (R0372) ° 15275 Washington Blvd.
- (R0156) ° 1285 Bancroft Ave.
- (R0367) ° 1784-150th Ave.

Mr. Miller
RE: Cal-EPA VOC study
December 26, 1991
Page 3 of 3

Thank you in advance for your cooperation in this matter. Please feel free to contact Mr. Scott Seery of this Division at 510/271-4320, or Ms. Eileen Hughes of DTSC at 510/540-3848, should you have any questions.

Sincerely,



Edgar B. Howell, III
Chief, Hazardous Materials Division

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Eileen Hughes, DTSC
Mike Bakaldin, San Leandro Fire Department
Jim Ferdinand, Eden Consolidated Fire District

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0367

December 11, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Mr. Joseph P. Theisen
Weiss Associates
5500 Shellmound Street
Emeryville, CA 94608

RE: SHELL SERVICE STATION, 1784-150TH AVENUE, SAN LEANDRO, ALAMEDA COUNTY

Dear Mr. Theisen:

This Department is in receipt and has completed review of the September 23, 1991 Weiss Associates (WA) work plan describing proposed additional investigative work at the referenced site. The scope of this additional work was first outlined in correspondence from this Department dated August 22, 1991, and includes the installation of two (2) additional ground water monitoring wells. The opinions expressed in this letter are in concurrence with those of the San Francisco Bay Regional Water Quality Control Board (RWQCB).

The Department's review was performed in context with the technical requirements outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks and the SWRCB LUP Final. The September 23 WA proposal may be approved provided the following points are clarified and the requested technical information submitted to the satisfaction of this Department.

- 1) Submit a site-specific Site Safety Plan which adheres to the requirements of 29 CFR Part 1910.120.
- 2) Provide a schematic well construction diagram.
- 3) Describe well drilling and construction method, including decontamination measures.
- 4) Indicate type, diameter, screen interval, and pack and slot sizing technique. Describe depth and type of seal.
- 5) Describe well development method and criteria for determining adequacy of development.
- 6) Describe water level measurement procedures (e.g., optical probe, steel tape, etc.).

Mr. Joseph P. Theisen
RE: Shell Station, 1784-150th Avenue, San Leandro
December 11, 1991
Page 2 of 2

- 7) Describe methods employed for free product measurement, and the observation of sheen and odor.
- 8) Describe well purging procedures prior to sampling.
- 9) Describe sample collection (both soil and ground water), sample QA/QC, and chain-of-custody procedures, and field screening techniques. Soil samples are to be collected every 5 feet of boring advancement, significant changes in lithology, and at any time there are "hits" on field screening instruments.
- 10) All collected soil and ground water samples submitted to the state-certified laboratory must be analyzed for TPH-G and -D, BTEX, and halogenated volatile organic compounds.

Please submit the requested information within 30 days in the form of an addendum to the original September 23 work plan. Once approved, we will expect work to commence within 30 days of the approval date. Thank you in advance for your timely cooperation in this matter.

Additionally, the August 22, 1991 correspondence also requested the submittal of the boring log for well MW-1, completed during March 1990. This has not been submitted to date. You are required to provide such boring logs. Please be certain that this log is include in your response to this letter. [Note: A similar request for a boring log was made for well MW-1 installed at the Shell Station located at 1285 Bancroft Avenue, San Leandro. The noted boring log should be included with your written response to the November 18, 1991 deficiency letter from this Department.]

Please call me at 510/271-4320 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DTSC
Mike Bakaldin, San Leandro Fire Department
Jack Bradstad, Shell Oil Company
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0367

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

August 22, 1991

Mr. Jack Bradstad
Shell Oil Company
P.O. Box 5278
Concord, CA 94520

RE: SHELL SERVICE STATION, 1784 150TH AVENUE, SAN LEANDRO, ALAMEDA COUNTY

Dear Mr. Bradstad:

This office is in receipt of the April 11, 1991 Weiss Associates (WA) report documenting the results of ground water monitoring and sampling occurring during the first quarter of 1991 at the referenced Shell site.

Review of this report indicates that the chlorinated solvent DCA is found in concentrations (6.7 ppb) an order-of-magnitude above current state MCLs; PCE has also been found, although not since March 1990, in concentrations exceeding its MCL, also by an order-of-magnitude. This data tends to confirm that a release from the former waste oil underground storage tank (UST) had occurred.

The data further suggests that there may have been a fuel release at this site, in addition to the release from the waste oil tank. A potential fuel release is suggested by dissolved concentrations (26 ppb) of the volatile fuel constituent benzene. The current MCL for benzene is 1.0 ppb.

Further, in the absence of definitive ground water gradient data, it is unclear whether well MW-1 is down- or cross-gradient from either the former waste oil tank or the fuel UST cluster. The WA reports "anticipate" that ground water flows to the west, which would place MW-1 downgradient of the former waste oil tank, and cross-gradient from the fuel UST cluster.

Following review of data presented in this and previous WA reports, including the waste oil tank closure and well installation reports dated October 17, 1989 and July 31, 1990, respectively, the Department and RWQCB have concurred that additional work and the submittal of additional information is required to better define the extent of environmental impacts associated with past or present releases from the UST(s) at this site.

Mr. Jack Bradstad
RE: Shell Station, 1784 150th Avenue
August 22, 1991
Page 2 of 4

The required tasks are as follows:

- 1) Submit a work plan for the installation of additional monitoring wells. Such wells are to be in sufficient number and appropriately located to enable calculation of the site-specific ground water gradient and flow direction, and to define the extent, or "zero-line", the contaminant plume;
- 2) Reinstate quarterly sampling for well MW-1;
- 3) Reinstate quarterly report submittal schedule. Such quarterly reports are required by Section 2652(d) of Title 23, California Code of Regulations (CCR);
- 4) Submit the boring log for well MW-1, completed during March 1990.

The work plan submitted in response in Task 1, above, must adhere to the technical requirements outlined in the RWQCB Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks and the SWRCB LUFT manual. This work plan is due within 30 days of the date of this letter, or by September 23, 1991.

A report must be submitted within 45 days after completion of field activities associated with this newest phase of work at the site. Subsequent reports are to be submitted quarterly (Task 3) until this site qualifies for final RWQCB "sign-off." In order to establish a routine reporting schedule, such quarterly reports are due the first day of the second month of each subsequent quarter (i.e., November 1, February 1, May 1, and August 1). Hence, a report documenting activities occurring during the third quarter of 1991 is due for submittal by November 1; that documenting work during the the fourth quarter 1991, February 1, 1992, and so forth.

The referenced reports must describe the status of the investigation and must include, among others, the following elements:

- o Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.

Mr. Jack Bradstad
RE: Shell Station, 1784 150th Avenue
August 22, 1991
Page 3 of 4

- o Status of ground water contamination characterization
- o Interpretation of results: water level contour maps showing gradients, free and dissolved product plume definition maps for each target component, geologic cross sections, etc.
- o Recommendations or plans for additional investigative work or remediation

Further, please adhere to the following minimum schedule for the next year for monitoring/sampling of new and existing wells at this site:

- o Water levels in each well are to be measured and recorded monthly for the next year. This schedule begins when the new wells are completed. This frequency will be reduced to quarterly after the first year;
- o All new wells are to be sampled monthly for the first quarter. Such monthly sampling may be reduced to quarterly after the first three months if concentrations of target compounds remain stable or diminish. Reinstate quarterly sampling of MW-1 (Task 2);

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. Please include a statement of qualifications for each lead professional involved with this project.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Failure to respond or a late response could result in the referral of this case to the RWQCB for enforcement, possibly subjecting the responsible party to civil penalties to a maximum of \$1,000 per day. Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB.

Should you have any questions about the content of this letter, please call me at 415/271-4320.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Mr. Jack Bradstad
RE: Shell Station, 1784 150th Avenue
August 22, 1991
Page 4 of 4

cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
Edgar Howell, Chief, Hazardous Materials Division
Gil Jensen, Alameda County District Attorney's Office
Lester Feldman, RWQCB
Howard Hatayama, DHS
Jim Ferdinand, Eden Consolidated Fire District
Joseph Theisen, Weiss Associates
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0367

November 8, 1990

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Ms. Lisa Foster
Shell Oil Company
P.O. Box 4023
Concord, CA 95424

**RE: Underground Storage Tank Permitting
Bayfair Shell, 1784 150th Ave.
San Leandro, California 94578**

Dear Ms. Foster:

This letter is in regards to the issuance of a five year permit to operate the four underground storage tanks at the above mentioned facility. Our office had requested information pertaining to the quarterly inventory monitoring reports (October thru December 1989), for the four underground tanks. We received the information we requested from Shell Oil Company and Mr. Stephen Volkmar, dealer of Bayfair Shell.

As a reminder, please be aware that you are required to report on your quarterly monitoring report any daily inventory swings which exceed the allowable levels specified in Section 2641 (5)(b) of the California Code of regulations, Title 23, Chapter 3, Subchapter 16, Underground Tank Regulations. An explanation in writing as to the cause of the variation should also be submitted to this office. All records must be maintained on site for the last three years.

Enclosed is a five year permit to operate the four underground tanks.

If you have any question, please contact me at (415) 271-4320.

Sincerely,

Susan L. Hugo

Susan L. Hugo
Hazardous Materials Specialist

Enclosures (2)

cc: Mr. Robert G. Wallin, Shell Area Manager
Mr. Stephen Volkmar, Dealer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0367

September 19, 1990

Stephen Volkmar
Shell Oil Company
1784 -150th Ave.
San Leandro, CA 94578

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Re: Waste Minimization Assessment

Dear Stephen Volkmar:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0156 (1285 Bancroft
V R0367 (1784 150th
Ave)

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

August 8, 1990

Mr. Paul Hayes
Shell Oil Company
P.O. Box 4848
Concord, CA 92803

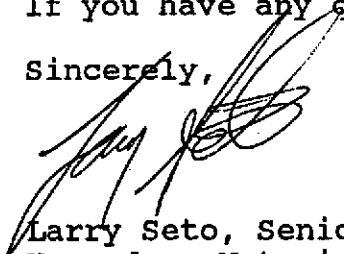
RE: 1784 - 150th Ave., San Leandro, CA
1285 Bancroft Ave., San Leandro, CA

Dear Mr. Hayes:

I have received for review, environmental reports for the two addresses above. Please submit separate deposit/refund checks for \$375.00, made payable to the County of Alameda, for each site to compensate us for our time.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,


Larry Seto, Senior,
Hazardous Materials Specialist

LS:mnc

cc: Karen Sixt, Weiss Associates
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Rafat A. Shahid, Assistant Agency Director, Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0367

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

April 2, 1990

Lisa Foster
Shell Oil Company
P.O. Box 4023
Concord, CA 95424

RE: Underground Tank Issuance of Five Year Permit

Dear Ms. Foster:

An underground tank inspection was conducted at Bayfair Shell located at 1784 150th Ave., San Leandro, CA 94578 on January 31, 1990 by Susan Hugo of our department.

The California Code of Regulations, Title 23, Chapter 3, Subchapter 16, Underground Tank Regulations, Section 2712(c) requires that you submit to this department, a copy of the annual precision test results performed recently. Our records showed that the last precision test was done on March 15, 1989. Your quarterly monitoring report (October thru December 1989) showed inventory swings exceeding the allowable levels specified in Section 2641 (5) (b). Please submit to this office an explanation in writing as to the cause of the variations.

The Five Year permit will be issued as soon as the department receives the above mentioned documents.

Please be advised that all monitoring records must be maintained on site for a period of at least 3 years.

If you have any question, please contact Susan Hugo, Hazardous Materials Specialist at (415) 271-4320.

Sincerely,


Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:SH:sh

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Ken Lottinger, Area Manager, Shell Oil Company
Mr. Stephen Volkmar, Dealer
Susan Hugo, Hazardous Materials Specialist
William Faulhaber, Hazardous Materials Specialist
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0364

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

June 24, 1989

Mr. Joseph P. Theisen, Project Geologist
Weiss Associates
2938 McClure St.
Oakland, CA 94609

Dear Mr. Theisen:

In response to your request for a file search of our records for the Shell Oil Tank Closures for the following locations, the following information is presented to you:

ALAMEDA

2160 Otis Dr.

(R02433)
(R02893)

No records of tank removal available in our files with the exception of a letter from Petroleum Engineering Inc. to T. Gerow of Alameda County Health Care Services for installation plans to replace waste oil tanks.

1601 Webster

(R01042)
(R02745)

Same information

HAYWARD

1097 W. Tennyson

No record of tank pull recommend you contact Hayward Fire Dept.

LIVERMORE

(R0769)
(R02525) 318 S. Livermore

No record of tank pull

1155 Portola

(R01054)
(R02566)

Inspection dated 9/27/88 requested tank closure plan for waste oil tank. No plan received to date

Mr. Joseph P. Theisen
Weiss Associates
Oakland, CA 94609
June 24, 1989
Pages 2 of 2

809 E. Stanley No record of tank pull

(R02524)

SAN LEANDRO

1784 - 150th No record of tank pull

(R0367)

1285 Bancroft No record of tank pull, recommend you contact the
San Leandro Fire Dept.

(R0156)

OAKLAND

510 E. 14th St. No record of tank pull

7915 E. 14th St. No record of tank pull

(R0349)

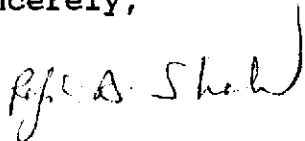
If the above tanks were pulled, we would request that you provide us with copies of any lab results from soil samples taken, manifest of the tanks or contaminated soil removed, etc.

This letter is limited to information available to this department and does not reflect other information, which may be accessible to other agencies or businesses involved with these properties.

Please find enclosed, a copy of the invoice sent to our Billing Unit, Alameda County Environmental Health Dept.

If you have any questions, please call Edgar Howell, Supervising Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:EH:mnc

cc: Edgar Howell, Alameda County Hazardous Materials Program
Files