

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
9-19-06

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

September 19, 2006

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

Mr. Roland C. Malone, Jr.  
P.O. Box 2744  
Castro Valley, CA 94546

Subject: Fuel Leak Case No. RO0000486, Shell#13-5701, 4255 MacArthur Blvd., Oakland, CA

Dear Mr. Brown and Mr. Malone:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the report entitled, "Well Installation Report," dated September 6, 2006. The report was prepared on your behalf by Cambria Environmental Technology, Inc. The "Well Installation Report," presents the results from the installation of four monitoring wells (MW-6 through MW-9) at the site to improve the groundwater monitoring network.

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

**TECHNICAL COMMENTS**

1. **Quarterly Groundwater Monitoring.** The "Well Installation Report," recommends that wells MW-6, MW-7, MW-8, and MW-9 be added to the existing groundwater monitoring program. We concur with adding the newly installed wells to the quarterly groundwater monitoring program. Please present the results in the quarterly monitoring reports requested below.

**TECHNICAL REPORT REQUEST**

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

- 45 days following the end of each quarter - Quarterly Monitoring Reports

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](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.

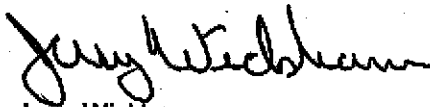
Mr. Denis Brown  
Mr. Roland C. Malone, Jr.  
September 19, 2006  
Page 3

**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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ana Friel  
Cambria Environmental Technology, Inc.  
270 Perkins Street  
Sonoma, CA 95406

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
04-06-06

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

April 6, 2006

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

Mr. Roland C. Malone, Jr.  
P.O. Box 2744  
Castro Valley, CA 94546

Subject: Fuel Leak Case No. RO0000486, Shell#13-5701, 4255 MacArthur Blvd., Oakland, CA –  
Work Plan Approval

Dear Mr. Brown and Mr. Malone:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the document entitled, "Well Installation Work Plan," March 24, 2006, prepared on your behalf by Cambria Environmental Technology, Inc. The Work Plan proposes the installation of three on-site and one off-site monitoring well. We concur with the proposed scope of work and request that you perform the proposed work and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)) prior to the start of field activities.

**TECHNICAL REPORT REQUEST**

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

- **May 15, 2006** - Quarterly Monitoring Report for the First Quarter 2006
- **August 15, 2006** – Well Installation Report and Quarterly Monitoring Report for the Second Quarter 2006

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Mr. Denis Brown  
Mr. Roland Malone  
April 6, 2006  
Page 2

### 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](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

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](mailto: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.

### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

Mr. Denis Brown  
Mr. Roland Malone  
April 6, 2006  
Page 3

**UNDERGROUND STORAGE TANK CLEANUP FUND**

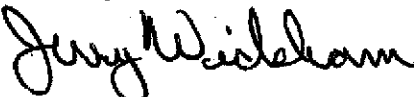
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**AGENCY OVERSIGHT**

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

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

Sincerely,



Jerry Wickham, P.G.  
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  
01-19-06

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

January 19, 2006

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

Mr. Roland C. Malone, Jr.  
P.O. Box 2744  
Castro Valley, CA 94546

Subject: Fuel Leak Case No. RO0000486, Shell#13-5701, 4255 MacArthur Blvd., Oakland, CA

Dear Mr. Brown and Mr. Malone:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Investigation Report," dated December 14, 2005, prepared on your behalf by Cambria Environmental Technology, Inc. The report presents the results of soil borings completed in October 2005 to perform soil and depth-discrete groundwater sampling to assess the site stratigraphy and vertical extent of hydrocarbons. Due to unexpected subsurface conditions, not all of the stratigraphic information was collected and no depth-discrete groundwater samples were collected.

The "Subsurface Investigation Report," recommends the installation of three on-site and one off-site groundwater monitoring well. ACEH concurs with this recommendation and requests that you submit a work plan to conduct this work by **March 24, 2006**. ACEH requests that you address the following technical comments and send us the reports described below.

**TECHNICAL COMMENTS**

1. **Cross Sections.** The conclusions of the "Subsurface Investigation Report," dated December 14, 2005, includes a discussion of soil stratigraphy, fuel hydrocarbon impacts at various depths, and possible migration pathways. Please supplement future discussions of this nature with the use of cross sections. A significant amount of detailed stratigraphic information has been collected for this site. We request that you prepare a minimum of one cross section oriented in the downgradient direction. Please prepare additional cross sections as necessary to illustrate site conditions. The cross sections are to include the lateral and vertical extent of soil layers, depths where groundwater was first encountered in borings and the static water levels, observations of free product, staining, or odor, the approximate location of the groundwater table, USTs and dispensers (including the tank pit backfill), and analytical data from soil samples and groundwater samples for each of the borings and wells shown on the cross sections. In addition, please show the total depth and screen intervals for all wells. Please present these cross sections in the Work Plan requested below.

Mr. Denis Brown  
Mr. Roland Malone  
January 19, 2006  
Page 2

2. **Table of Well Construction Details.** Please include a table that summarizes well construction details in the Work Plan requested below. The table should include the well ID, date installed, top of casing elevation, total depth, borehole diameter, screened interval, slot size, filter pack interval, filter pack material, bentonite seal interval, and grout seal interval.

#### **TECHNICAL REPORT REQUEST**

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

- **February 15, 2006** - Quarterly Report for the Fourth Quarter 2005
- **March 24, 2006** – Work Plan for Monitoring Well Installation
- **May 15, 2006** - Quarterly 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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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](mailto:jerry.wickham@acgov.org).



Mr. Denis Brown  
Mr. Roland Malone  
January 19, 2006  
Page 3

#### PERJURY STATEMENT

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#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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#### UNDERGROUND STORAGE TANK CLEANUP FUND

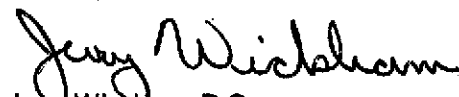
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### AGENCY OVERSIGHT

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

Sincerely,



Jerry Wickham, P.G.  
Hazardous Materials Specialist

Mr. Denis Brown  
Mr. Roland Malone  
January 19, 2006  
Page 4

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Matthew Derby  
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  
8-8-05

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

August 8, 2005

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

Dear Mr. Brown:

Subject: Fuel Leak Case No. RO0000486, Shell, 2455 MacArthur Boulevard, Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the work plan entitled, "Subsurface Investigation Work Plan," dated July 27, 2005, prepared on Shell's behalf by Cambria Environmental Technology. We concur with the work proposed. We request that you perform the proposed work and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)) prior to the start of field activities.

**TECHNICAL REPORT REQUEST**

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

- **November 1, 2005** - Quarterly Report for the Third Quarter 2005
- **December 19, 2005** - Subsurface Investigation Report
- **February 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 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

Matthew Derby  
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



12-18-02

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

December 16, 2002

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

Dear Ms. Petryna:

Subject: Fuel Leak Case RO0000486, UST Closure Sampling Plan, 4255 MacArthur Blvd.,  
Oakland, CA 94619

Our office has received and reviewed the December 9, 2002 Underground Storage Tank Closure Sampling Plan for the referenced site prepared by Cambria Environmental, your consultant. As you are aware, the City of Oakland Fire Department is responsible for overseeing the removal of the underground tank system and the required regulatory sampling. Our office is overseeing the soil and groundwater investigation under the Local Oversight Program (LOP). Our office would be interested in observing and commenting on any additional excavation and sampling of areas of obvious contamination, groundwater removal and remediation. To that end, please inform our office prior to performing work outside that of done at "typical" tank removals.

One technical comment: Please ensure that your analysis of ether oxygenates includes the entire suite of oxygenates plus ethanol and the lead scavengers.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Ms. M. Munz, Cambria, 1144 65<sup>th</sup> St., Suite B, Oakland, CA 94608  
Mr. L. Griffin, City of Oakland Fire Dept.

USTremsampling4255MacArthurBlvd

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



07-17-01

July 16, 2001  
StID#3769/ RO0000486

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: First Quarter 2001 Monitoring Report, Sensitive Receptor Survey and Site Conceptual Model, 4255 MacArthur Blvd., Oakland CA 94619**

Dear Ms. Petryna:

Our office has received and reviewed the report for the above referenced Shell-branded service station prepared by Cambria, your consultant. I would like to comment on the following observations noted in this report:

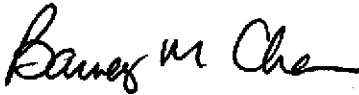
- Groundwater TPH concentrations are consistent with past results, however, the extent of the MTBE plume has not yet been defined. This may be clarified once the off-site, down-gradient well is installed and monitored. The 1/15/2001 MTBE results for MW-2 needs further evaluation since the results by EPA Method 8020 (44,400 ppb) and that by EPA Method 8260 (5,080 ppb) differ by one order of magnitude. This is unusual particularly since the other contaminants, TPHg and BTEX, are comparable to last quarter's and last quarter's MTBE concentrations were 61,200 and 66,600 ppb by EPA 8020 and 8260, respectively.
- Oxygen Releasing Compound (ORC) socks have been placed in wells MW-1 through MW-3. It was noted that three well volumes were purged prior to sampling. Please comment on the validity of sampling these wells in this manner and how representative these results are.
- Dual Phase Extraction was performed on wells MW-2 and TB-2. Significant TPH and MTBE mass was removed, however, it is not possible to estimate the effectiveness of this remediation. Future remediation will include groundwater extraction from MW-3 and TB-1. Please include the sampling and analysis of groundwater from the tank back-fill wells, TB-1 and TB-2. This can help determine if the tanks represent an on-going source of contamination. Monthly DPE is scheduled.
- A receptor and utility survey was performed. No down-gradient domestic wells were identified. Those utilities which may be at depths, which could intercept seasonal groundwater are located up-gradient to the site and therefore, are not likely being impacted. It is noted, however, that an active Unocal station exists up-gradient to this site. The Unocal station has also experience a significant MTBE release, however, as mentioned in this report, the utilities may be acting as a partial barrier to its migration towards the Shell site. It may be prudent to install an additional monitoring well immediately down-gradient of the Unocal site to determine if an off-site source exists. Past investigations in this area did not analyze for MTBE in soil or groundwater.

Ms. Karen Petryna  
StID#3769/ RO0000486  
4255 MacArthur Blvd., Oakland 94619  
July 16, 2001  
Page 2

Please comment on these observations **within 30 days or no later than August 20, 2001.**

You may contact me at (510) 567-6765.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files  
Ms. M. Munz, Cambria, 1144 65<sup>th</sup> St., Suite B, Oakland, CA 94608  
Comment4255MacArthur

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



07-02-01

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

June 29, 2001  
StID # 37697 RO0000486

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

**Re: Shell Branded Service Station, 4255 Mac Arthur Blvd., Oakland CA 94619**

Dear Ms. Petryna:

Our office has received and reviewed the June 26, 2001 Second Quarter 2001 Monitoring Report for the above referenced site. As you are aware, this site has had an on-going problem with elevated TPHg and MTBE in groundwater. These contaminants have migrated off-site beneath and beyond the adjacent trailer park and likely towards Interstate 580. An off-site well is waiting Cal-Trans right-of-way permission before drilling can proceed. In the meanwhile, remediation at the site consists of monthly dual-phase and groundwater extraction from monitoring and tank backfill wells, respectively. The results of this remediation has not resulted in significant reduction of dissolved hydrocarbon and MTBE concentration as evidenced in MW-2 monitoring results. Perhaps this is a result of an on-going release or just normal for this type of remediation since TPH and MTBE mass is being removed.

Please consider more frequent than monthly treatment of the wells. This is recommended since it was noticed that the concentration in tank backfill well TB-2 is elevated and the vacuum truck was reported filled in only 45 minutes when extracting groundwater from this well.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files  
Mr. S. Bork, Cambria Environmental, 1144 65<sup>th</sup> St., Suite B, Oakland CA 94608

gwext4255MacArthur



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-8-00

20486

December 7, 2000  
StID # 3769

Ms. Karen Petryna  
Equiva Services LLC  
P.O. Box 7869  
Burbank, CA 91501-7869

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

**Re: Shell Branded Station, 4255 MacArthur Blvd., Oakland CA 94612**

Dear Ms. Petryna:

This letter provides comments on your November 16, 2000 Third Quarter 2000 Monitoring Report for the above referenced service station as prepared by Cambria Environmental Technology, Inc. (Cambria). It further clarifies the County's opinion and requests regarding the on-going environmental investigation.

I would also like to revisit some of the points in my prior August 22, 2000 letter. Please let me know if you'd like another copy of this letter. These items include the following:

- Your Second Quarter 2000 monitoring report dated September 1, 2000 stated that Cambria would re-initiate monthly extraction from wells MW-2, TB-1 and TB-2. It appears that this was not done since the third quarter 2000 report states they will re-initiate active remediation on November 16, 2000 and it does not indicate any hydrocarbons were removed during the quarter.
- My August 22<sup>nd</sup> letter noted that dissolved oxygen was low in the wells with ORC socks (MW-1, MW-3, MW-4 and TB-1). The Second Quarter report stated that ORC replacement would be performed by September 2000 and replaced every six months thereafter. The Equiva Well Monitoring Data Sheets for MW-4 indicate a pre-purge D.O. reading of 1.4 mg/l. Why is the D.O. still low and where are the other data sheets for wells MW-1 and MW-3? In addition, the TPHg/BTEX/MTBE analytical report sheets from Sequoia Analytical are missing for MW-1, MW-2 and MW-3 in the monitoring report.
- My August 22<sup>nd</sup> letter requested timelier submission of monitoring reports. Cambria stated the third quarter 2000 report would be submitted by September 30, 2000. Our office received the November 16, 2000 Third Quarter 2000 on November 20, 2000.
- The Second Quarter 2000 report stated that Cambria was evaluating alternative locations for a previously proposed monitoring well, ie the down-gradient well on Cal Trans property. The Third Quarter 2000 report states that an additional well is not warranted at this time. The rationale is that prior data already exists in the area of a well, which would be relocated on closer trailer park location. Cambria also states that benzene and MTBE attenuation is being observed in wells MW-2 and MW-4. I assume that Cambria still believes the up-gradient well that they previously proposed is still warranted. A down-gradient well is necessary to determine the limit of the TPH and MTBE plume. The grab groundwater data, which previously exists does not do this, nor does it adequately estimate the down-gradient extent of groundwater contamination. Our office recommended moving the down-gradient well to trailer park area to reduce the current delay experienced due to Cal Trans. Be advised, this

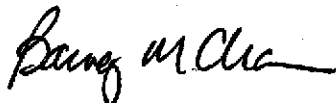
Ms. K. Petryna  
StID # 3769  
4255 MacArthur Blvd., Oakland 94619  
December 7, 2000  
Page 2.

- data is necessary regardless of the existence of a receptor. Upon review of data, it appears that MW-4 is not immediately down-gradient of MW-2, therefore it is not reasonable to compare the contaminant concentrations in these wells to show natural attenuation. In fact, looking at the concentration of MTBE in these wells independently, you see they are actually not attenuating.

As you may be aware, the SWRCB issued their final draft of Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates (3/27/00). They recommend interim remedial action for sites with free product or persistent concentrations of MTBE over 10,000 ppb such as this. Therefore, we recommend dual-phase extraction from TB-1 and MW-3 in addition to MW-2 and TB-2. To reduce the potential of spreading contamination from the source, please treat MW-3 last, after the other well concentrations have been reduced. Please also analyze samples from the tank back-fill wells to estimate TPH removal amounts. **Our office concurs with Cambria's recommendation of performing a site conceptual model (SCM) including a well survey and conduit study in addition to the additional well investigation not in lieu.**

Please contact me at (510) 567-6765 if you have any comments or questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files  
Mr. T. Buggle, Cambria Environmental Technology, Inc., 1144 65<sup>th</sup> Ave., Suite B,  
Oakland CA 94608

2-4255MacArthur

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 8-23-2000

RO# 486

August 22, 2000  
StID # 3769

Ms. Karen Petryna  
Equiva Services LLC  
P.O. Box 7869  
Burbank, CA 91501-7869

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

**Re: Shell Branded Station, 4255 MacArthur Blvd., Oakland CA 94619**

Dear Ms. Petryna:

Our office has received and reviewed the August 16, 2000 **First Quarter 2000 Monitoring Report** for the above referenced site as prepared by Cambria Environmental Technology (Cambria), your consultant. I have the following observations and comments:

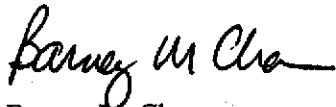
- This site continues to display a significant MTBE release, which has impacted groundwater. Monitoring well MW-4, the most down-gradient well exhibited a substantial increase in MTBE going from 539 to 12,000 ppb, the highest ever reported concentration in this well.
- On February 28, 2000 approximately 4,700 gallons of groundwater was extracted from MW-2 and tank backfill well TB-2. Although groundwater extraction has been going on since April 1999, there hasn't been a noticeable decrease in concentration in MW-2. Can you extract from additional wells such as MW-3, MW-4 and tank backfill well TB-1? Please indicate your future schedule planned for groundwater extraction.
- It was noted that the figures in Table 2, **Petroleum Hydrocarbon Mass Removal** may be incorrect owing to the incorrect conversion factor used, 1g/1e9 ug instead of 1g/1e6 ug. Therefore, the pounds of mass are off by a factor of 0.001. As you are aware, expressing the amount of MTBE removed in pounds minimizes the impact of such the release. One pound of MTBE is enough to contaminate 10,000,000 gallons of water at the MCL.
- It was noticed that although ORC socks have been added to MW-1, MW-3, MW-4 and TB-1, the dissolved oxygen level in the impacted wells are low, 1-4 ppm, while the non-impacted well was reported as high as 16.9 ppm. Please determine if and when the socks need replacement.
- There continues to be a significant delay from the time the wells are sampled to the time our office receives the monitoring report. For instance, the January 2000 sampling event was finally submitted in August of 2000. This delay can, at times, prevent our office from being aware of a potential problem and at the least prevents our office from making any timely constructive observations regarding the site. What can be done to prevent such a delay from sampling date to submittal date? Your quarterly monitoring report should be submitted prior to the next quarterly sampling event ie minimum of every 3 months.
- Our office concurs with Cambria's recommendation to evaluate an alternative location for the off-site down-gradient well. Delays have occurred in obtaining access to the Cal Trans property near the interstate 580 freeway, therefore, you should consider relocating the proposed well on the trailer park. Please initiate negotiation to gain access for this alternative well location.

Ms. Karen Petryna  
4255 MacArthur Blvd., Oakland CA 94619  
August 22, 2000  
StID # 3769  
Page 2.

**Please respond in writing to the above items within 30 days or no later than September 25, 2000.**

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files  
Mr. T. Buggle, Cambria Environmental, 1144 65<sup>th</sup> St., Suite B, Oakland CA 94608  
4255 MacArthur

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 486

March 30, 1999  
StID # 3769

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

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

**Re: Work Plan Addendum for Shell-branded Service Station, 4255 MacArthur Blvd.,  
Oakland CA 94619**

Dear Ms. Petryna:

Our office has received and reviewed the March 22, 1999 Work Plan Addendum as prepared by your consultant, Cambria Environmental Technology, Inc. (Cambria). Their letter further clarifies items brought out in my February 19, 1999 letter which, in turn, commented on the June 29, 1998 Cambria work plan. At this time, it is hoped that all comments from our office have been resolved so remediation and additional investigation can be initiated.

Cambria reply to the items in my February 19, 1999 letter by proposing the following:

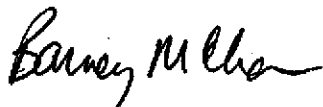
- The bio-attenuation parameters; dissolved oxygen, total alkalinity, ferrous iron, nitrate, sulfate and oxidation reduction potential will be run on an annual basis during the third quarter of the year. Please run dissolved oxygen and oxidation reduction potential on a quarterly basis. This will be an immediate check on the success of the addition of the ORC socks. An interpretation of these results should be included in your monitoring report.
- The presence of MTBE will be confirmed using EPA Method 8260 in all wells during the second quarter 1999 monitoring event and then subsequently only on the highest MTBE sample detected by EPA Method 8020.
- ORC socks are proposed to be placed in wells MW-1, MW-3, MW-4 and the UST backfill wells.
- Groundwater extraction will be performed on MW-2 and the two tank backfill wells on a monthly basis for three months and then the results will be evaluated to determine if this is an effective approach.
- The two previously proposed monitoring wells will be installed as soon as the permits are received.

If and when groundwater extraction is complete from the wells, you should determine if enough ORC is being added to the tank pit based upon the residual soil contamination assumed in the tank pit soils. You may want to contact Regenesys for their input in estimating the amount of ORC required for the tank pit.

Ms. Karen Petryna  
StID # 3769  
4255 MacArthur Blvd., Oakland CA 94619  
March 30, 1999  
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files  
Mr. B. Busch, Cambria Environmental, 1144 65<sup>th</sup> St., Suite B, Oakland CA 94608

2wpap4255

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#486

February 19, 1999  
StID # 3769

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

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

Re: Work Plan for Shell-branded Service Station, 4255 MacArthur Blvd., Oakland CA  
94619

Dear Ms. Petryna:

This letter serves to formally respond to the June 29, 1998 Cambria **Additional Investigation Work Plan** for the above site. Our office had been in correspondence with Mr. Alex Perez of Shell. My May 7, 1998 letter expressed my concerns over potential elevated residual concentrations of gasoline, benzene and MTBE in soil and groundwater. It appeared that the site would fail a Tier 1 ASTM Risk Assessment. The historic presence of free product in monitoring wells MW-2 and MW-3 was also a concern. These conditions may be the result of the limited success of over-excavation of petroleum contamination at the time of the original underground tank removals.

In response to the County's May 7, 1998 letter, Cambria provided the June 29, 1998 work plan. This work plan proposed the installation of two additional monitoring wells, one near the northern pump island and one further down-gradient in the Caltrans right-of-way. I spoke with Mr. Brian Busch of Cambria regarding my concerns for additional requirements on July 7, 1998 and he was to have spoken with Mr. Perez. Apparently, this never happened. At this time, our office formally approves the installation of the two additional monitoring wells and requests the following requirements:

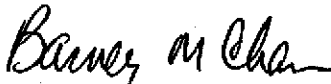
- Please run the following bio-attenuation parameters on your future monitoring events; dissolved oxygen, oxygen-reduction potential, nitrate, sulfate, ferrous iron and alkalinity.
- Because natural attenuation was recommended for this site, please have your consultant estimate the amount of oxygen (therefore, the amount of ORC) needed to treat the petroleum contaminant plume. A recommendation for the addition of oxygen either through ORC injection and/or the addition of ORC "socks" should be made.
- EPA Method 8260 should be run to confirm the highest MTBE values reported in groundwater.
- Because an apparent petroleum source is the existing tank pit, consideration will be given to either extracting groundwater or treating this area.

Please add the above items to the original work plan and provide a schedule for the implementation of the work plan within 30 days or by March 22, 1999.

Ms. Karen Petryna  
StID # 3769  
4255 MacArthur Blvd., Oakland CA 94619  
February 19, 1999  
Page 2.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files  
Mr. B. Busch, Cambria Environmental, 1144 65<sup>th</sup> St., Suite B, Oakland CA 94608  
Wpap4255



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0#486

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

May 7, 1998  
StID # 3769

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

**Re: Remedial Action Plan for Shell Service Station, 4255 MacArthur Blvd., Oakland CA 94619**

Dear Mr. Perez:

Our office has recently received and reviewed the following reports for the above site:

- Cambria Soil Vapor Extraction Test Report, February 23, 1998
- Cambria First Quarter 1998 Monitoring Report, April 13, 1998 and
- Cambria Remedial Action Plan, April 15, 1998.

Upon review of these reports, our office has the following comments, observations and requirements:

- The December 1985 UST replacement report states that approximately 810 cubic yards of soil was disposed, however, up to 22,000 ppm TVH and 500 ppm benzene were detected in soil samples. Because no confirmatory excavation samples were taken, residual contamination up to these levels may still exist within the tank pit.
- Up to 1700 ppm TPHg and 3.3 ppm benzene was detected in soil borings from MW-3 indicating the extent of potential soil contamination.
- The November 1995 dispenser and piping removal report detected shallow soil contamination up to 7300 ppm TPHg. The report further states that no benzene above 1 ppm was detected in any of the 15 soil samples, however, the detection limit for benzene in soil samples, S-1, S-2, S-3 and S-8 was <5, 15, 12 and 5 ppm, respectively. This means up to 15 ppm could have been in soil sample S-2. It is unclear whether any overexcavation occurred, so our office assumes these represent conservative residual concentrations. Note that soil boring BH-E @5' bgs, near S-1, S-2 and S-8, exhibited 5900 ppm TPHg and 23 ppm benzene. It is, therefore, reasonable that these soil samples did in fact contain benzene, just at levels below the extremely high detection limits.

These facts indicate that residual soil contamination may lie within the underground tank pit and beneath the dispensers with elevated benzene concentration.

Mr. Alex Perez  
4255 MacArthur Blvd.  
StID # 3769  
May 7, 1998  
Page 2.

The Remedial Action Plan (RAP) states that the hydrocarbon plume is apparently stable as demonstrated by the historical groundwater concentration of benzene in MW-4, however, MW-4 does not represent all downgradient groundwater from this site. In addition, though TPH concentrations may be stabilizing off-site, the same cannot be said about the MTBE concentration. Perhaps indicative of a MTBE plume which has detached from the TPH plume, MTBE is actually increasing in the downgradient well. The grab groundwater sample from SB-2, the most directly downgradient boring from the USTs, detected 46,000 ppb MTBE. Although our office does not yet have a formal policy for MTBE, we're confident it must be defined to much lower concentrations than at this site. Its presence should also be confirmed by analyzing for MTBE via EPA Method 8260. Our office anticipates receiving RWQCB recommendation for oxygenate monitoring soon.

The **Risk to Human Health** section of the RAP identifies hydrocarbon volatilization from groundwater to outdoor air as the only potential exposure pathway. This is based upon impacted soil and groundwater being below 10'. However, it is clear that shallow soil contamination exists in at least the area beneath the dispensers. Residual soil contamination exists within the tank pit, which is typically filled with permeable fill allowing for preferential vapor migration. Groundwater elevation is variable at the site with depth to water varying from 7-14' bgs in the latest monitoring event.

The potential exposure pathways cannot be limited to the existing site usage. It is reasonable to consider future scenarios with buildings being located above contaminated soil or groundwater. In fact, employees working in the kiosk at the site, are near the dispensers where shallow soil contamination was identified. Both soil and groundwater volatilization to indoor air must also be evaluated in your Tier 1 RBCA. Cambria is correct when it states that health-based risk assessments are not usually done on sites with free product. The site must also be adequately characterized.

Upon evaluation of various remedial approaches, Cambria recommends:

- Manual bailing of wells for free product recovery,
- Installation of ORC compounds in all wells except MW-2. ORC would be added to MW-2 when free product is gone, and
- Dissolved oxygen would be added to the quarterly monitoring program to verify the result of ORC addition.

Mr. Alex Perez  
4255 MacArthur Blvd.  
StID # 3769  
May 7, 1998  
Page 3.

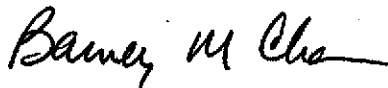
Our office would like to see a more aggressive approach for site remediation. Please address the following:

- How will the extent of MTBE contamination be verified and what if any remediation is recommended for its elevated concentrations? Are additional monitoring well(s) needed for site characterization?
- Since the tank pit appears to be acting as a source of dissolved and free product, what will be done to remove or remediate this contamination? Can groundwater be extracted from the tank pit? Can oxygen or other supplements be added to the tank pit?
- There is a need to determine background levels of analytes indicative of biodegradation. You should analyze each well for the following parameters: dissolved oxygen, oxygen-reduction potential (ORP), nitrate, sulfate, ferrous iron and alkalinity. Based upon these results, you may need to add other supplements in addition to ORC.
- Please verify that the addition of ORC only in the existing monitoring wells will provide enough dissolved oxygen to impact the **entire** site. Note that an array of ORC probes is often necessary to treat a large plume. A software program, available from the ORC supplier, exists which generates a recommended array of ORC probes to adequately affect a given site.
- Please contact Ms. Madhulla Logan to discuss the specific details of an appropriate human health risk assessment. You may need to incorporate a risk evaluation of MTBE in your RBCA.

Please respond to the above items within 30 days or by June 8, 1998.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Mr. K. Rahman, Cambria Environmental, 1144 65<sup>th</sup> St., Ste. B,  
Oakland CA 94608

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

Ro# 486

February 18, 1998  
StID # 3769

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

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

**Re: Work Plan for Site Investigation at Shell Service Station,  
4255 MacArthur Blvd., Oakland CA 94619**

Dear Mr. Perez:

Our office has received and reviewed the January 27, 1998 Fourth Quarter 1997 Monitoring Report for the above referenced site. We also acknowledge that Shell proposes to implement their work plan for the advancement of two offsite geoprobe borings during the first quarter of 1998. You are reminded to analyze at least one of the borings within the vadose zone for the following: permeability, moisture content, total porosity and organic carbon content for future use in your risk assessment.

Based upon the existing site conditions, our office has the following additional questions/requests:

\* Please analyze for MTBE using both EPA modified 8020 and 8260 as recommended by the SFRWQCB. Noticeable differences in MTBE concentration have been observed in these two methods.

\* Our office was informed that a Soil-Vapor Extraction Pilot test was scheduled for the site in September 1997, please provide a copy of the results of this test.

\* Based upon the results of the SVE pilot test, please provide a work plan for site remediation. It is clear that the presence of free product and an undefined groundwater plume would require some type of remediation.

Please provide a work plan and the requested technical report within 30 days or by March 19, 1998. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

c: B. Chan, files

Mr. K. Rahman, Cambria Environmental, 1144 65th St., Ste.  
B, Oakland CA 94608 wp4255

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 486

December 5, 1997  
StID # 3769

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

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

**Re: Work Plan for Site Investigation at Shell Service Station,  
4255 MacArthur Blvd., Oakland CA 94619**

Dear Mr. Perez:

As a result of Environmental Health's reorganization I have assumed the oversight of your subsurface investigation at the above referenced site. I have reviewed the case file up to the **September 25, 1997 Third Quarter 1997 Monitoring Report** from Cambria. I am aware of Ms. Juliet Shin's previous requests for this site. Upon review, it appears that you may not have received a written approval for the advancement of the two Geoprobe borings within the trailer park adjacent to this site.

Therefore, this letter serves to approve the advancement of the two temporary borings in the locations indicated on Figure 1 of Cambria's July 22, 1997 work plan. As stated in the work plan, both soil and grab groundwater samples will be taken from each boring to be analyzed for TPHg, BTEX and MTBE. As you screen the soil samples from each boring, please analyze all samples which exhibit elevated field screening results. You may use professional discretion and analyze one soil sample should no sample exhibit any volatile vapor. Please insure that the soil sample(s) taken for permeability, moisture content, total porosity and organic carbon content be taken from native soils within the vadose zone. You should proceed with this field work as soon as possible.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

c: B. Chan, files

Mr. Scott MacLeod, Cambria Environmental, 1144 65th St., Ste.  
B, Oakland CA 94608

wpap4255

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

R0#486

June 25, 1997

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

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

STID 3769

Re: Work plan for investigations at Shell Service Station WIC #204-5510-0600, located at  
4255 MacArthur Blvd., Oakland, CA

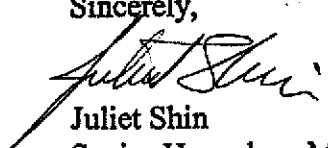
Dear Mr. Perez,

This office has reviewed CAMBRIA's Workplan Addendum, dated June 13, 1997, for the above site. The workplan proposes to evaluate possible dual-phase extraction for the site based on a Soil Vapor Extraction (SVE) test they propose to conduct at the site during the third quarter of 1997. This SVE test is acceptable to this office. A report, including recommendations based on the SVE test, should be submitted to this office within 45 days after completing these tests.

Due to the fact that the severity of petroleum impact to the trailer park, which is immediately downgradient of the site, is unknown, this office is requesting that the next phase of work include an assessment of contaminant concentrations beneath the trailer park site. If free product is identified beneath this trailer park, then remediation will need to be considered (possibly SVE, if it is feasible). Otherwise, a risk assessment, or soil vapor sampling, will need to be conducted on the concentrations found at that site. Until the trailer park is better characterized, no risk assessment for this site will be required. Additionally, due to Shell's intentions for remediating the plume beneath the Shell site, no risk assessment is currently required for this site. An addendum to the workplan, addressing the characterization of the trailer park, should be submitted to this office within 30 days of the date of this letter (i.e., by July 23, 1997).

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

  
Juliet Shin  
Senior Hazardous Materials Specialist

cc: N. Scott MacLeod, Cambria Environmental Technology, Inc., 1144 65th Street, Suite B,  
Oakland, CA 94608

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#486

June 12, 1997

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

ENVIRONMENTAL HEALTH SERVICES

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

STID 3769

Re: Investigations at Shell Service Station WIC #204-5510-0600, located at 4255 MacArthur Blvd., Oakland, CA

Dear Mr. Perez,

This office has reviewed Cambria's First Quarter 1997 Groundwater Monitoring Report, dated May 16, 1997, for the above site. Per the County's request, groundwater samples were analyzed for chromium, copper, and lead, in this last quarterly sampling event. Based on the lab analysis results, the chromium concentration in Well MW-4 exceeded the California drinking water threshold of 50 parts per billion. Per my conversation with Peggy Penner, Sequoia Analytical, on June 12, 1997, these groundwater samples were not filtered prior to the metals analysis. Although it is unclear whether these concentrations are attributable to the site, this office is requesting that one more round of analysis for dissolved chromium, and not total chromium, be conducted in the next quarterly sampling event.

Additionally, based on the great variation in depth-to-water identified from the monitoring wells, this office is requesting that a couple of cross-sections be prepared for these wells and included in the next monitoring report. This will be a helpful tool in understanding the geology and hydrology at the site.

Lastly, per our conversation on June 10, 1997, an addendum to the June 21, 1996 workplan will be submitted to this office by sometime next week, i.e., by June 20, 1997.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin  
Senior Hazardous Materials Specialist

cc: Scott MacLeod, Cambria Environmental Tech., Inc., 1144 65th St., Ste B,  
Oakland, CA 94608

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#486

October 31, 1996

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

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

STID 3769

Re: Investigations at Shell Service Station WIC #204-5510-0600, located at 4255 MacArthur Blvd., Oakland, California

Dear Mr. Granberry,

The case files for the above site have recently been transferred to a new Alameda County Hazardous Materials Specialist, Juliet Shin, for oversight of investigations and corrective action.

Free product and elevated levels of TPHg and BTEX have consistently been identified in on-site wells MW-2 and MW-3 since monitoring of these wells began in November 1993. Additionally, elevated levels of benzene have been consistently identified in the off-site, downgradient well, MW-4.

The contaminant concentrations in Well MW-2 and MW-3 appear to have increased from elevated dissolved hydrocarbons to the presence of separate phase hydrocarbons, which is indicative of an on-going source. Although, some excavation was conducted around the underground storage tank area during the tank replacement in 1985, it appears that the excavation work may not have removed all of the source. In an effort to contain the plume from further migration and prevent further impact to the groundwater, and potentially to human health, this office is requesting that a corrective action proposal be submitted addressing these concerns. Although Weiss Associates submitted a Soil Vapor Extraction (SVE) Test Workplan, dated June 21, 1996, it appears that this system alone would not address the contaminants in Well MW-4, located over 80 feet from the site, and the groundwater contamination lying beneath the trailer park property located between Well MW-4 and the site. Although the SVE test is acceptable to this office, an addendum to the workplan needs to be submitted addressing greater containment measures for the off-site, downgradient extent of the contaminant plume beneath the trailer park and around Well MW-4.

Based on the separate phase hydrocarbons located at the downgradient property boundary, this office is concerned about the health of the people residing at the trailer park. This office is requesting that adequate risk assessment information be submitted to address this concern.



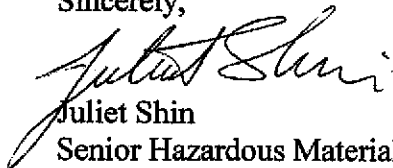
Jeff Granberry  
Re: 4255 MacArthur Blvd.  
October 31, 1996  
Page 2 of 2

Analytical results of the soil samples collected in and around the underground storage tanks in 1985 identified elevated levels of chromium, copper, and lead exceeding ten times the STLCS given in Title 22 California Code of Regulations. Since that time, no additional analysis for metals appear to have been conducted. This office is requesting that you include an analysis for heavy metals in the next quarterly groundwater monitoring event.

In the last groundwater sampling event, elevated detection limits were used for the analysis of TPHg for samples collected from MW-1 and MW-4. If possible, please try and utilize the lower detection limit of 50ppb for this analysis.

This office is requesting that the above requested workplan, and the risk assessment information, be submitted to this office **within 45 days of the date of this letter (i.e., by December 12, 1996)**. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin  
Senior Hazardous Materials Specialist

cc: Scott MacLeod  
Cambria Environmental Tech., Inc.  
1144 65th Street, Ste B  
Oakland, CA 94608

Acting Chief-File

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY  
DAVID J. KEARS, Agency Director



RO# 486

Alameda County CC4580  
Environmental Health Services  
1131 Harbor Bay Pkwy., #250  
Alameda CA 94502-6577  
(510)567-6700 FAX(510)337-9335

May 7, 1996

**Jeff Granberry**  
Shell Oil Products  
P.O. Box 4023  
Concord, CA - 94524

**Ref: Shell Service Station, 4255 Macarthur Boulevard, Oakland, California**

Dear Mr. Granberry:

I am in receipt of the documents "Displacement Replacement Sampling" dated April 1, 1996 and the most recent quarterly monitoring report dated January 11, 1996 for the above referenced site. Groundwater monitoring of the wells, MW-1, MW-2 and MW-3 have been performed since November 1993 and monitoring well, MW-4 has been sampled since November 1994. This Department requires that a workplan be submitted to address the following issues:

- Based on the results submitted to this Department, significant concentrations of gasoline and benzene have been detected in monitoring well, MW-4 and free product has been noted in both monitoring wells, MW-2 and MW-3 for the past 2 quarters of monitoring. Since the extent of contamination has not been fully defined, at least one additional monitoring well at a minimum should be installed down gradient to monitoring well, MW-2 and MW-3.
- Subsequent to the removal of the dispensers and product piping at the referenced property, a total of 15 soil samples were collected. Significant concentrations of gasoline up to 7800 ppm and benzene up to 0.85 ppm were found in the soil samples collected beneath the dispensers and product piping. Since the report does not document the occurrence of any overexcavation in contaminated areas and the source has not been removed, include in your workplan, a cleanup strategy for the contaminated soils.
- Include a proposal to remediate the existing petroleum hydrocarbon free product and to control further migration of the contamination in groundwater.
- The samples collected from the stockpiled soils were found to contain significant concentrations of metals. Please submit the results of this analysis in a tabulated form and discuss the potential source of the metal contamination based on the past use of the property.

**The workplan addressing the above mentioned requirements should be submitted within 45 days of receiving this letter. This is a formal request for technical reports pursuant to California Water Code Section 13267 (b). If you have any questions, you may reach me at (510) 567-6764.**

Sincerely,

A handwritten signature in cursive script that reads "Madhulla Logan".

Madhulla Logan  
Hazardous Material Specialist

CC: Tim Utterback, Weiss Associates, 5500 Shellmound Street, Emeryville, CA - 94608-2411

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#486

ALAMEDA COUNTY HEALTH AGENCY  
DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 HARBOR BAY PARKWAY, SUITE 250  
ALAMEDA, CA 94502-6577 (cc 430-451)  
Ph (510) 567-6700 FAX (510) 337-9335

January 31, 1996

A & S Engineering  
45 Quail Court #303  
Walnut Creek, CA 94596

Dear Mr. Padilla:

Subject: Shell Service Station, 4255 MacArthur Blvd., CA 94619

The initial deposit of \$603.00 for our Agency to review plans, and to make inspections for the removal of existing piping and the installation of new piping, secondary containment, and monitoring system for the subject facility was depleted.

Please submit a check payable to "Alameda County" for an additional \$801.90 to pay for work required to complete this project. Enclosed is an accounting of the time spent on this project.

In addition, please complete and return "Form C".

If you have questions, you may contact me at 510-567-6746.

Sincerely,

Don Hwang  
Hazardous Materials Specialist

DH:cmb

wp/A:Padilla

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0486

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

June 1, 1994

Mr. Dan Kirk  
Shell Oil Company  
P.O. Box 5278  
Concord, CA 94520-9998

STID 3769

Re: Work plan for investigations at Shell Service Station WIC  
#204-5510-0600, located at 4255 MacArthur Blvd., Oakland,  
California

Dear Mr. Kirk,

This office has reviewed Weiss Associates' work plan, dated May 19, 1994, for the above site. This work plan is acceptable with the following conditions/reminders:

- o All three on-site monitoring wells have consistently identified very elevated levels of TPHg and BTEX, with the lowest concentrations being identified in the upgradient well, MW-1. Although an off-site survey will be conducted to identify any potential off-site sources, it appears that the Shell site may be a primary contributor, if not the sole contributor, to the observed on-site contamination. **Per Article 11 Title 23 California Code of Regulations and RWQCB's guidelines, you are required to fully characterize and delineate the extent of both soil and ground water contamination at the site, and permanent monitoring wells and quarterly monitoring are required to be employed to delineate the extent of the ground water contaminant plume. However, the proposed work does not address all these issues. It is the understanding of this office that this phase of work will only be used as a screening tool to determine adequate locations for permanent monitoring wells.**

The proposed work, along with the off-site survey, shall be performed **within 45 days** of the date of this letter. **Within 45 days** after completing field activities, a report documenting the work, and a work plan proposing the installation of permanent monitoring wells to delineate the extent of the plume, shall be submitted to this office.

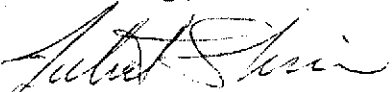
Mr. Dan Kirk  
Re: 4255 MacArthur  
June 1, 1994  
Page 2 of 2

- o A minimum of one soil sample from each boring location shall be analyzed at a certified laboratory, in an effort to delineate the extent of soil contamination at the site.

Lastly, although you submitted the laboratory analysis results for soil samples collected from the past overexcavation, it is still unclear where these soil samples were collected from and how much contaminated soil was left in place. Please make additional efforts to obtain more detailed information about the tank removals and overexcavation.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Janet MacDonald  
Weiss Associates  
5500 Shellmound St.  
Emeryville, CA 94608-2411

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0486

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

March 23, 1994

Mr. Dan Kirk  
Shell Oil Company  
P.O. Box 5278  
Concord, CA 94520-9998

STID 3769

Re: Investigations at Shell Service Station WIC #204-5510-0600,  
located at 4255 MacArthur Blvd., Oakland, California

Dear Mr. Kirk,

This office has reviewed Weiss Associate's Subsurface Investigation Report, dated March 15, 1994, addressing the installation and sampling of three monitoring wells. Ground water samples collected from these wells identified very elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg), as high as 31,000 parts per billion (ppb) and benzene, toluene, ethylbenzene, and xylenes (BTEX) as high as 9,400 ppb. Soil samples collected from one of the downgradient wells, MW-3, identified 1,700 ppm TPHg at 11.3 feet below ground surface (bgs) and 610 ppm TPHg at 16 feet bgs. Low levels of TPHg and BTEX were also identified from the soil samples collected from the other wells.

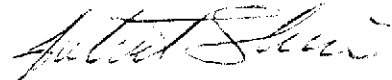
Based on the above results, you are required to conduct further investigations to delineate the extent and severity of both soil and ground water contamination at the site. A work plan addressing this work shall be submitted **within 60 days** of the date of this letter. Although the report proposes that the contamination observed in MW-1 is potentially the result of upgradient sources, it appears that the site is, at least, the primary source of the observed contamination, since the downgradient wells, MW-2 and MW-3, identified contaminant concentrations that were two orders of magnitude greater than the upgradient well. Additionally, there is not yet enough evidence to confirm that the contamination observed in MW-1 is coming from off site.

Lastly, this office has no records of the 1985 tank replacement and sampling by Gettler-Ryan. Please submit any documentation of this work to this office with the work plan.

If you have any questions or comments, please contact me at (510) 271-4530.

Mr. Dan Kirk  
Re: 4255 MacArthur Blvd.  
March 23, 1994  
Page 2 of 2

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Janet K. MacDonald  
Weiss Associates  
5500 Shellmound St.  
Emeryville, CA 94608-2411

James R. Malone  
MacArthur-High Trailer Park  
P.O. Box 1204  
Manteca, CA 95336

Edgar Howell-File(JS)



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0486

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

June 11, 1993

Mr. James Malone, et al  
c/o Ms. Susan Parrish  
P.O. Box 5561  
Eugene, Oregon 97405

STID 3769

Re: Access permission for the installation of one monitoring well by Shell Service Station, located at 4255 MacArthur Blvd., Oakland

Dear Mr. Malone,

As you may be aware, an environmental investigation has been in progress at the referenced Shell Service Station (Shell) neighboring your site. The investigation was warranted as a result of an unauthorized release of petroleum products from the underground storage tanks into the soil beneath the site.

Shell is required to conduct ground water investigations to determine whether this release has impacted the ground water. Shell has proposed to install three monitoring wells on the site in the projected downgradient direction from the release. The most crucial location of the three proposed wells is the one that Shell proposed on your property. If Shell was correct in estimating the regional ground water gradient direction, this well would be located immediately downgradient of the underground storage tanks, which is required by the Regional Water Quality Control Board (RWQCB). Shell could not install this well on their property due to overhead electrical lines and sewer lines.

Shell has attempted to gain access to your property for the installation of this well since October 1992. Shell submitted a Right of Entry request to you on October 29, 1992, and another one on December 29, 1992. To this date, it appears that you have not granted access.

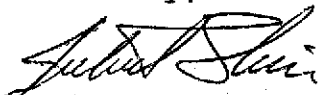
Please be advised that should an agreement not soon be reached between the parties involved in this issue, this case will be referred to RWQCB for action. The RWQCB, pursuant to their authority under Section 13267 of the California Water Code, will require the party or parties responsible for the referenced parcel to conduct their own investigation, **at their expense**. Failure to meet RWQCB investigation and reporting schedules could result in the imposition of fines of up to \$1,000 per day of delinquency.

Mr. James Malone  
Re: Right of Entry Request  
June 11, 1993  
Page 2 of 2

Within 45 days of the date of this letter, this Department will expect to be informed by Shell that a License Agreement for site access has been signed. Should such an agreement not be reached within this time frame, this aspect of the case will be turned over to the RWQCB for action.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,



Juliet Shin  
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Tim Walker  
GeoStrategies Inc.  
2140 West Winton Avenue  
Hayward, CA 94545

Dan Kirk  
Shell Oil Company  
P.O. Box 5278  
Concord, CA 94520-9998

Edgar Howell-File(JS)

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0486

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

October 16, 1992  
STID 3769

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

Re: 4255 MacArthur Blvd., Oakland, CA 94619

Dear Dan Kirk:

This office has received and reviewed the Work Plan for the above site submitted by GeoStrategies dated September 30, 1992. The plan is acceptable as written, with the work scheduled to be done in the 4th quarter of 1992.

If you have any questions please call this office at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Peacock".

Thomas F. Peacock, Supervising HMS  
Hazardous Material Division

cc: R. Hiatt, RWQCB  
Edgar Howell, Chief - File  
Roland Malone, Jr., P.O Box 2099, Houston, TX 77252

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0486  
State Water Resources Control Board  
Division of Clean Water Programs  
UST Local Oversight Program

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) ~~271-4299~~ 271-4530

June 30, 1992

Dan Kirk  
Shell Oil Company Corp.  
P.O. Box 5278  
Concord, CA 94520-9998

Re: 4255 MacArthur Blvd., Oakland, 94619  
STID # 3769

Dear Mr. Kirk:

This office has reviewed information on the above site. A report from Emcon Associates in July 1985 mentions a water sample in well # S-1 was tested to have 840 ppb of dissolved gasoline. The report also mentions a soil sample of 15,800 ppm of gasoline. A letter from shell to this office mentions these samples and said that level would require soil removal. The letter was signed by R. G. Newsome. This office has no record of any soil removal. The station was notified by this office in August 1988 that a leak report had to be filed. This office has no leak report. Apparently the tanks at the site were removed and replaced some time in late 1985 or in 1986. This office has no record of tank removal or replacement. None of our inspectors weat the site and there are no plans.

Because of the level of contamination discovered you must begin a groundwater investigation at this site. Please submit a proposal within 30 days to this office. Attached is a description of work plan requirements and also information needed for case closure.

If you have any questions please contact this office, at 271-4530.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Peacock'.

Thomas Peacock, Supervising HMS  
Hazardous Material Division

cc: Lester Feldman, RWQCB  
Mark Thomson, Alameda County District Attorney

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0486

June 4, 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  
Shivan Shell, 4255 MacArthur Blvd.,  
Oakland, CA 94619

Dear Ms. Foster:

This letter is in regards to the issuance of a 5 year permit to operate the three underground storage tanks at the above mentioned facility. Our office had requested information pertaining to the precision test results performed on the tanks. We received the information we requested from Shell Oil Company.

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 three underground tanks.

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

Enclosures (2)

cc: Ken Lottinger, Shell Area Manager  
Ms. Vanita Bindal, Dealer

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0486

April 2, 1990

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

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 Shivan Shell located at 4255 Macarthur Blvd., Oakland, CA 94619 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 precision test results performed on the tanks.

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

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  
Ms. Vanita Bindal, Dealer  
Susan Hugo, Hazardous Materials Specialist  
Cynthia Chapman, Hazardous Materials Specialist  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



Department of Environmental Health  
Hazardous Materials Division  
80 Swan Way, Room 200  
Oakland, CA 94621

R0486

Telephone Number: (415) 271-4320

August 31, 1988

Shell Service Station  
4255 MacArthur Blvd.  
Oakland, CA 94619

SUBJECT: UNDERGROUND STORAGE UNAUTHORIZED RELEASE (LEAK)  
CONTAMINATION SITE REPORT

Dear Sir:

Our office received a report of a failed underground storage tank test from Hunter Environmental Services, Inc. The California Administrative Code, Title 23, requires all unauthorized releases to be reported. Section 2652(b) requires within 5 working days of detecting the release, the operator or permittee shall submit to the local agency (Alameda County Hazardous Materials Division) a full written report to include all of the following information which is known at the time of filing the report:

- 1) List of type and quantity of hazardous substances released.
- 2) The results of all investigations completed at that time to determine the extent of soil or groundwater or surface water contamination due to the release.
- 3) Method of cleanup implemented to date, proposed cleanup actions, and approximate cost of actions taken to date.
- 4) Method and location of disposal of the released hazardous substance and any contaminated soils or groundwater or surface water (indicate whether a hazardous waste manifest(s) is utilized).
- 5) Proposed method of repair or replacement of the primary and secondary containers.
- 6) Facility operator's name and telephone number.

Shell Service Station  
4255 MacArthur Blvd.  
Oakland, CA 94619  
Page 2 of 2  
August 31, 1988

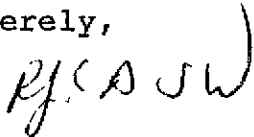
Until cleanup is complete, the operator or permittee shall submit reports to the County and the Regional Water Quality Control Board (RWQCB) every 3 months or at a more frequent interval if specified by either agency. The reports shall include the information requested in 2, 3, and 4 of the above. The report requested above shall be prepared in accordance with the San Francisco Regional Water Quality Control Board's "Guidelines for Addressing Fuel Leaks," September 1985. The initial investigation report shall be submitted within 30 days and shall include a site safety plan.

Soils contaminated at hazardous waste concentrations shall be transported by a licensed hazardous hauler and disposed of or treated at a California Department of Health Services approved facility. Soils contaminated below hazardous waste concentrations may be managed as non-hazardous but are subject to waste discharge requirements of the Regional Board.

Enclosed in an "Underground Storage Tank Unauthorized Release (Leak)/ Contamination Site Report" which should be completed and returned within 5 working days.

Should you have any questions regarding this letter, please contact Lowell Miller, Senior Hazardous Materials Specialist at 415/271-4320.

Sincerely,



Rafat A. Shahid, Chief  
Hazardous Materials Division

RAS:LM:mam

Enclosure