

Ro 495

Wickham, Jerry, Env. Health

To: Cool, Aubrey
Cc: Baertschi, Dennis; Weston, Robert, Env. Health
Subject: RE: 29 Wildwood, Piedmont - soil and pea gravel results

Based on the results presented, re-use of the pea gravel is acceptable.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 fax
jerry.wickham@acgov.org

From: Cool, Aubrey [<mailto:ACool@croworld.com>]
Sent: Thursday, May 24, 2007 4:25 PM
To: Wickham, Jerry, Env. Health
Cc: Baertschi, Dennis
Subject: 29 Wildwood, Piedmont - soil and pea gravel results

Mr. Wickham:

We removed a waste oil tank at the referenced site on 5/9/07. I attached the soil and pea gravel results. Based on these results, we do not recommend over-excavation and we would like to re-use the pea gravel. Is that acceptable to you?

Regards,
Aubrey

Aubrey Cool, PG
Conestoga-Rovers & Associates (CRA)
5900 Hollis Street, Suite A
Emeryville, CA 94608
P. 510.420.3336
F. 510.420.9170
C. 707.333.0753

CRA has acquired the former Cambria Environmental Technology, Inc.
Visit us at www.croworld.com

5/25/2007

RO 495



CONESTOGA-ROVERS & ASSOCIATES

5900 Hollis St., Suite A
Emeryville, California 94608
Telephone: (510) 420-0700 Fax: (510) 420-9170
www.CRAworld.com

TRANSMITTAL

DATE: 5-22-07

REFERENCE NO.: _____

PROJECT NAME: Shell Oil Products US
29 Wildwood Avenue, Piedmont

TO: Robert Weston

Alameda County Health Care Services Agency

1131 Harbor Bay Parkway

Alameda, CA 94502

Alameda County

MAY 23 2007

Environmental Health

2007 MAY 23 AM 9:25

Please find enclosed: Draft Final
 Originals Other
 Prints

Sent via: Mail Same Day Courier
 Overnight Courier Other

QUANTITY	DESCRIPTION
1	Unauthorized Release Report

As Requested For Review and Comment
 For Your Use _____

COMMENTS:

Copy to: _____

Completed by: Diane Lundquist
[Please Print]

Signed: _____

Filing: **Correspondence File**

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT			
EMERGENCY <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> Yes <input type="checkbox"/> No	
REPORT DATE 5/21/2007		CASE #	
FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25100.7 OF THE HEALTH AND SAFETY CODE.		SIGNED _____ DATE _____	
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Tim Woodson		PHONE (925) 766-3494
	REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> REGIONAL BOARD <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME Shell Oil Products US
RESPONSIBLE PARTY	ADDRESS 20945 S. Wilmington Avenue		CARSON CA 90810 CITY STATE ZIP
	NAME Shell Oil Products US		CONTACT PERSON Denis Brown
SITE LOCATION	FACILITY NAME (IF APPLICABLE) Shell-branded Service Station		OPERATOR Noel Coffin
	ADDRESS 29 Wildwood Avenue		Piedmont Alameda 94610 CITY COUNTY ZIP
IMPLEMENTING AGENCIES	LOCAL AGENCY AGENCY NAME Alameda County Health Care Services Agency - Robert Weston		PHONE (510) 567-6781
	REGIONAL BOARD San Francisco Bay		PHONE (510) 622-2300
SUBSTANCES INVOLVED	(1) TPHg - 1100 ug/l (WO-W), methylene chloride - 99 ug/l (WO-W)		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> Unknown
	(2) TPH as diesel - 1.7 mg/kg (WO-1.5) and 710 ug/l (WO-W) O&G - 17 mg/kg (WO-1.5)		<input checked="" type="checkbox"/> Unknown
DISCOVERY/DATE/TIME/INT	DATE DISCOVERED 5/18/2007		HOW DISCOVERED <input type="checkbox"/> Tank Test <input checked="" type="checkbox"/> Tank Removal <input type="checkbox"/> Nuisance Conditions <input type="checkbox"/> Inventory Control <input type="checkbox"/> Subsurface Monitoring <input type="checkbox"/> Other
	DATE DISCHARGE BEGAN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> Remove Contents <input checked="" type="checkbox"/> Close Tank <input type="checkbox"/> Repair Tank <input type="checkbox"/> Change Procedure <input type="checkbox"/> Replace Tank <input type="checkbox"/> Other <input type="checkbox"/> Repair Piping
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 5/9/2007		
SOURCES/CHARGE	SOURCE OF DISCHARGE <input type="checkbox"/> Tank Leak <input type="checkbox"/> Piping Leak <input checked="" type="checkbox"/> Unknown <input type="checkbox"/> Other		CAUSE(S) <input type="checkbox"/> Overfill <input type="checkbox"/> Corrosion <input type="checkbox"/> Rupture/Failure <input checked="" type="checkbox"/> Unknown <input type="checkbox"/> Spill <input type="checkbox"/> Other
CASE TYPE	CHECK ONE ONLY <input type="checkbox"/> Undetermined <input type="checkbox"/> Soil Only <input checked="" type="checkbox"/> Groundwater <input type="checkbox"/> Drinking Water - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)		
CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> No Action Taken <input type="checkbox"/> Case Closed (Cleanup Completed or Unnecessary) <input type="checkbox"/> Leak Being Confirmed <input type="checkbox"/> Pollution Characterization <input type="checkbox"/> Remediation Plan <input type="checkbox"/> Post Cleanup Monitoring in Progress <input type="checkbox"/> Preliminary Site Assessment Workplan Submitted <input type="checkbox"/> Cleanup Underway <input type="checkbox"/> Preliminary Site Assessment Underway		
RECOMMENDED ACTION	CHECK APPROPRIATE ACTION(S) <input type="checkbox"/> Cap Site (CD) <input type="checkbox"/> Excavate & Treat (ET) <input type="checkbox"/> Treatment At Hookup (HU) <input checked="" type="checkbox"/> Other - pending agency evaluation <input type="checkbox"/> Contamination Barrier (CB) <input type="checkbox"/> No Action Required (NA) <input type="checkbox"/> Enhanced Bio Degradation (IT) <input type="checkbox"/> Vacuum Extract (VE) <input type="checkbox"/> Remove Free Product (FP) <input type="checkbox"/> Replace Supply (RS) <input type="checkbox"/> Excavate & Dispose (ED) <input type="checkbox"/> Pump & Treat Groundwater (GT) <input type="checkbox"/> Vent Soil (VS)		
COMMENTS	Soil and water concentrations were found during waste oil tank removal activities including TPHg, TPHd, BTEX, methylene chloride, oil and grease, chromium, lead, nickel, and zinc. CRA notified Alameda County Health Care Services Agency on 5/18/2007 at 4:45 PM. CRA left a voice mail for inspector Robert Weston. A report documenting the reported findings will be submitted to the agency within 60 days.		

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

December 21, 2005

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

Subject: Fuel Leak Case No. RC [REDACTED] Shell, 29 Wildwood Avenue, Piedmont, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the report entitled, "Site Conceptual Model," dated November 10, 2005. The report was prepared on Shell's behalf by Cambria Environmental Technology, Inc. Fuel hydrocarbons have been detected in groundwater at the site since 1989. Total petroleum hydrocarbons as gasoline (TPHg), benzene, and methyl tert-butyl ether (MTBE) continue to be detected at elevated concentrations in groundwater in the on-site downgradient monitoring well (MW-3) but concentrations are significantly lower to not detectable in off-site wells. Groundwater monitoring data indicate that the concentrations of fuel hydrocarbons are generally decreasing. Based on the long-term groundwater monitoring data, we concur with the recommendations in the SCM to decrease groundwater monitoring frequency.

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

TECHNICAL COMMENTS

1. **Groundwater Beneficial Use.** Groundwater at the site is a potential drinking water source. Therefore, water quality criteria for drinking water are to be considered in site evaluation.
2. **Groundwater Monitoring.** Groundwater monitoring has been ongoing at this site since 1989. Based on the long-term monitoring data available for the site, reductions in monitoring frequency from quarterly to annual are acceptable for all monitoring wells except MW-3. Monitoring frequency for well MW-3 is to be revised from quarterly to semi-annual. Groundwater monitoring results are to be presented in the reports requested below.

TECHNICAL REPORT REQUEST

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

- **May 14, 2006** – Semi-Annual Monitoring Report (First Quarter 2006)

- **November 15, 2006** – Semi-Annual Monitoring Report (Third 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

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).

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.

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

Denis Brown
December 21, 2005
Page 3

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

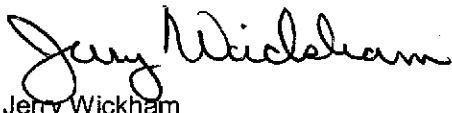
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

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

CAMBRIA

FROM:

~~To:~~ **Mr. Scott Seery - Env. Health Services**

Company: Alameda Co. Health Care Services

Fax: 510.337-9335

Phone: 510.567-6783



TO:

~~From:~~ Matt Derby

Phone: 510.420.3332

Pages: ~~3~~ 2

Date: 6/233

Re: Shell, 29 Wildwood Ave, Piedmont
DWR Well Record Release Form

Fax

Hard Copy to Follow? Yes No

Dear Mr. Seery:

On behalf of Shell, for Cambria to complete the 1/2-mile well survey requested by you in your 5/15/03 letter to Shell, Cambria needs your signature and information completed on the Department of Water Resources "Well Completion Report Release Agreement - Agency".

Would you please complete the blank sections of the form, and return by me by fax at (510) 420-9170 at your earliest convenience? I appreciate your assistance with this project.

Please call me if you have any questions or need additional information.

Sincerely,

Matthew W. Derby
Matthew W. Derby, P.E.
Senior Project Engineer

This fax transmittal is intended solely for use by the person or entity identified above. Any copying or distribution of this document by anyone other than the intended recipient is strictly prohibited. If you are not the intended recipient, please telephone us immediately and return the original transmittal to us at the address listed below.

Cambria Environmental Technology, Inc., 5900 Hollis Street, Suite A, Emeryville, CA 94608 Tel (510) 420-0700 Fax (510) 420-9170

STATE OF CALIFORNIA - THE RESOURCES AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF WATER RESOURCES

CENTRAL DISTRICT
3251 S Street
Sacramento, CA 95816
(916) 227-7632
(916) 227-7600(Fax)

NORTHERN DISTRICT
2440 Main Street
Red Bluff, CA 96080
(530) 529-7300
(530) 529-7322 (Fax)

SAN JOAQUIN DISTRICT
3374 East Shields Avenue
Fresno, CA 93726
(559) 230-3300
(559) 230-3301 (Fax)

SOUTHERN DISTRICT
770 Fairmont Avenue
Glendale, CA 91203
(818) 543-4600
(818) 543-4604 (Fax)

WELL COMPLETION REPORT RELEASE AGREEMENT--AGENCY
(Government and Regulatory Agencies and their Authorized Agents)

Project/Contract No. 29 Wildwood, Piedmont, CA County Alameda

Township, Range, and Section T 1 South, R 3 West, Section 30 Radius 1/2 mile
(Must include entire study area and a map that shows the area of interest.) (See attached map)

Under California Water Code Section 13752, the agency named below requests permission from Department of Water Resources to inspect or copy, or for our authorized agent named below to inspect or copy, Well Completion Reports filed pursuant to Section 13751 to (check one):

Make a study, or,

Perform an environmental cleanup study associated with an unauthorized release of a contaminant within a distance of 1/2 miles.

In accordance with Section 13752, information obtained from these reports shall be kept confidential and shall not be disseminated, published, or made available for inspection by the public without written authorization from the owner(s) of the well(s). The information shall be used only for the purpose of conducting the study. Copies obtained shall be stamped **CONFIDENTIAL** and shall be kept in a restricted file accessible only to agency staff or the authorized agent.

Matthew W. Derby, P.E.

CAMBRIA Environmental Technology
Authorized Agent

Alameda Co. Env. Health
Government or Regulatory Agency

5900 Holtz St, Ste A

Address

1131 Harbor Bay Pkwy

Address

Emeryville, CA 94608

City, State, and Zip Code

Alameda, CA 94502

City, State, and Zip Code

Matthew W. Derby
Signature

[Signature]
Signature

Title Sr. Project Engineer

Title Hazardous Materials Specialist

Telephone (510) 420-3332

Telephone (510) 567-6783

Fax (510) 420-9170

Fax (510) 337-8335

Date 6/23/03

Date 6-24-03

E-mail mderbby@cambria-env.com

E-mail sseery@co.alameda.ca.us

Seery, Scott, Env. Health

From: Seery, Scott, Env. Health
Sent: Tuesday, July 15, 2003 11:16 AM
To: 'Matt Derby'
Cc: KEPetryna@shellopus.com; akreml@cambria-env.com
Subject: RE: Extension Request for submission of Well Survey at Shell Station, 29 Wildwood Ave, Piedmont

An extension until August 15, 2003 for the submittal of the completed SCM and associated elements appears acceptable.

Scott Seery

-----Original Message-----

From: Matt Derby [mailto:mderbby@cambria-env.com]
Sent: Monday, July 14, 2003 2:48 PM
To: sseery@co.alameda.ca.us
Cc: KEPetryna@shellopus.com; akreml@cambria-env.com; mderby@cambria-env.com
Subject: Extension Request for submission of Well Survey at Shell Station, 29 Wildwood Ave, Piedmont

Dear Mr. Seery:

Per your request, this note follows our brief telephone conversation today regarding submittal of the 1/2-mile well survey report for the subject site, and a request for extension.

The Alameda County Health Care Services Agency's (ACHCSA's) May 15, 2003 letter to Shell requested a preferential pathway study, including a conduit/utility survey, well search, and site conceptual model (SCM). The letter specified July 15, 2003 due dates for these items.

With the July 9, 2003 *Second Quarter 2003 Monitoring Report and Agency Response*, Cambria submitted a copy of Cambria's January 20, 2003 *Conduit Study Report* (which had been previously prepared at Shell's request), discussed issues related to the preferential pathway study, and stated that the 1/2-mile well survey results and Site Conceptual Model would be submitted under separate cover.

On June 24, 2003, Cambria submitted a request for well completion reports within 1/2 mile of the site to the Dept of Water Resources. On about June 25, I spoke with Ms. Anne Roth of DWR to determine when the record copies might be received. At that time, she anticipated that, based on her recently reduced availability to perform well records searches and the order in which my request was received, the records might be sent out by July 7th. However, as of today, Cambria has not received the requested records from DWR, and I have inquired today about the status of the request. I am currently awaiting a response from DWR.

At this time, pending word from DWR, I expect to obtain the DWR records and complete the 1/2-mile well survey and Site Conceptual Model report for submission to you no later than **August 15**,

7/15/2003

2003.

If you agree that this revised submittal date is acceptable, I would appreciate a brief e-mail response noting your concurrence for our records. Please call me at (510)-420-3332 if you have any questions or need any additional information regarding this request. Thank you for your consideration.

Sincerely,

Matthew W. Derby, P.E.

Cambria Environmental Technology, Inc.

5900 Hollis Street

Suite A

Emeryville, CA 94608

(510) 420-3332 direct

(510) 448-1276 pgr

(510) 420-9170 fax

mderby@cambria-env.com

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

May 16, 2003

RO 495

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

RE: Shell Station, 29 Wildwood Avenue, Piedmont - Request for Total Fuel Oxygenate Analyses

Dear Ms. Petryna:

Please direct your consultant to continue analyzing all samples collected during future scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) using EPA Method 8260. Please continue with this expanded analysis until further notice.

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
John Speakman, Chief, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94568
Matthew Derby, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608
D. Drogos, R. Weston

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO0000495

May 15, 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: Preferential Pathway Study and SCM for Shell Station, 29 Wildwood Avenue, Piedmont

Dear Ms. Petryna:

This letter follows a review of the historic fuel leak case file for the above referenced site, in response to a request from your consultant, Cambria Environmental Technology, Inc. (Cambria), to reduce the sampling frequency of many of the wells in the limited monitoring well network. This request is denied at this time, as the body of work completed to date appears inadequate to monitor the release(s) from this site. This office is concerned with the continued presence, and periodically elevated concentrations, of the fuel oxygenate Methyl tert-Butyl Ether (MtBE). We are also concerned that the MtBE plume has not been adequately defined. Further, we are concerned about the presence of potential preferential flow pathways, both geogenic and anthropogenic, that may be contributing to the dispersal of contaminants away from the site, skirting the current monitoring network.

This letter presents a request to complete a Preferential Pathway Study and Site Conceptual Model (SCM) for the subject site in accordance with the breadth of California Code of Regulations (CCR), Title 23, Division 3, Chapter 16, Article 11, "Corrective Action Requirements"; State Water Resources Control Board Resolution 9249, "Policies and Procedure for Investigation, Cleanup and Abatement of Discharges Under Water Code Section 13304"; and the Regional Water Quality Control Board (Regional Board) Water Quality Control Plan for the basin.

The following technical comments address investigation and related performance objectives that shall be considered as part of the required technical reports. **We request that you submit a Preferential Pathway Study and SCM.**

TECHNICAL COMMENTS

1. Preferential Pathway Study

Although we understand that Weiss Associates (WA) conducted a limited utility conduit evaluation in 1992 in preparation for the installation of additional off-site wells, few data specific to this current request were actually evaluated. Consequently, a conduit / preferential pathway survey shall be prepared for the site that identifies potential migration pathways and potential conduits (utilities, storms drains, etc.) that may be present in the vicinity of the site. Geogenic pathways need also be evaluated. Professional interpretations shall be rendered. This survey must include, among other components, the submittal of comprehensive map(s) clearly showing the location and depth of all utility lines and trenches identified in the study, utility/trench slope or grade, flow directions, backfill materials present, and how such characteristics may or may not affect plume dispersal from the site.

You shall also identify the presence of all wells within a ½ mile radius of the site (i.e., monitoring and production wells; active, inactive, standby, destroyed, abandoned).

Using the results of the conduit / preferential pathway study, tank operational histories and records, and data from previous investigations at the site, you are to develop the initial three-dimensional *Site Conceptual Model* (SCM) of site conditions.

2. Site Conceptual Model

Starting with a critical review of the pending conduit study and data from previous investigations and tank operational records for this site, you are to develop the initial three-dimensional SCM of site conditions. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point the SCM is considered "validated". The validated SCM forms the foundation for developing the most cost-effective final Corrective Action Plan (CAP). The SCM will also be the basis for determining if additional assessment is warranted and contemplating a reduction in sampling frequencies.

Your attention is directed to "*Strategies for Characterizing Subsurface Releases of Gasoline Containing MtBE*", American Petroleum Institute Publication No. 4699 dated February 2000 as a resource for development of the SCM. Your attention is also directed to the State Water Resources Control Board (SWRCB) "*Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Final Draft*", dated March 27, 2000, as well as the June 2002 ChevronTexaco Energy Research and Technology Company technical bulletin entitled "*Mass Flux Estimates to Assist Decision-Making*" to help in development and strategies for refinement of the SCM.

TECHINCAL REPORT REQUEST

Please submit technical reports according to, or otherwise comply with, the following schedule:

July 15, 2003 – SCM and Preferential Pathway Study report

July 15, 2003 – Quarterly Report for the Second Quarter 2003

October 15, 2003 – Quarterly Report for the Third Quarter 2003

January 15, 2004 – Quarterly Report for the Fourth Quarter 2003

April 15, 2004 – Quarterly Report for the First Quarter 2004

Ms. Karen Petryna
Re: Shell Station, 29 Wildwood Ave., Piedmont
May 15, 2003
Page 3 of 3

These reports and work plans are being requested pursuant to the Regional Board's authority under Section 13267(b) of the California Water Code. **Each technical report shall include conclusions and recommendations for the next phases of work required at the site should more appear necessary to refine the SCM.** We request that all required work be performed in a prompt and timely manner, as suggested by the noted schedule, above. Revisions to this schedule shall be requested in writing with appropriate justification for anticipated delays.

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that all work plans and technical reports containing professional geologic or engineering evaluations and/or judgments be completed under the direction of an appropriately registered or certified professional. This registered or certified professional shall sign and wet stamp all such reports and work plans.

All reports and work plans are to be submitted under cover, signed under penalty of perjury, by the Responsible Party(ies) who have taken a lead role in compliance with corrective action directives.

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 Alameda County District Attorney, for possible enforcement follow up. Enforcement follow up may include administrative action or monetary penalties of up to \$10,000 per day for each day of violation of the California Health and Safety Code, Division 20, Chapter 6.76.

If you have any questions, I can be reached at (510) 567-6783.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Betty Graham, RWQCB
Dave Charter, SWRCB UST Fund
John Speakman, Chief, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94611
Matthew Derby, Cambria Env. Technology, 1144-65th St., Ste. B, Oakland, CA 94608
D. Drogos, R. Weston

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



October 22, 2002

RO 495

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, 29 Wildwood Avenue, Piedmont - 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 third 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
John Speakman, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94568
Jacquelyn Jones, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608

C A M B R I A

November 23, 1999

Ms. Pamela Evans
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, California 94502

Re: Certified List of Record Fee Title Owners for:
Former Shell Service Station
29 Wildwood Ave.
Piedmont, CA
Incident No. 98995822

Dear Ms. Evans:

In accordance with section 25297.15(a) of Chapter 6.7 of the Health Safety Code and on behalf of Equiva Services LLC, we certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site.

Equilon Enterprises LLC c/o Stewart Title Guaranty Company, 1980 Post Oak Blvd.,
Suite 110, Houston, TX 77056

Sincerely,



Ailsa S. Le May, R.G.
Senior Geologist

cc: Karen Petryna, Equiva Services LLC, P.O. Box 6249, Carson, California, 90749-6249

Oakland, CA
Sonoma, CA
Portland, OR
Seattle, WA

**Cambria
Environmental
Technology, Inc.**

1144 65th Street
Suite B
Oakland, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

99 NOV 29 PM 4:48
ENVIRONMENTAL
PROTECTION

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

May 18, 1999

Mr. Dana G. Parry
Law Offices of Dana G. Parry
1200 Concord Avenue, Ste. 200
Concord, CA 94520

RE: Shell Service Station, 29 Wildwood Avenue, and (expanded) Ann Martin
Children's Center, 1246 Grand Avenue, Piedmont

Dear Mr. Parry:

I understand from our conversation and your letter of May 14, 1999 that your client, Mr. Jon Q. Reynolds, is in the process of purchasing a residential property ("Property") located at 1246 Grand Avenue (ASN 051-4638-015-01). The Property immediately adjoins the subject Shell station to the north. I also understand that the Property, once purchased, will be leased to the Ann Martin Children's Center, which currently abuts the Property to the north, to accommodate an expansion of that facility.

The subject Shell Station has been the focus of an environmental investigation since 1984 following the discovery of an apparent gasoline release from the underground storage tanks (UST) formerly at this site. Those early tanks were subsequently replaced in September 1984. I understand that additional station upgrades were completed in early 1998 in order to comply with the December 1998 Federal UST standards. This station is fully permitted to operate.

Since 1984, six (6) groundwater-monitoring wells have been constructed and numerous soil borings advanced in an effort to define the extent of the gasoline release at the subject Shell site. Although soil and groundwater have both been impacted to a noteworthy extent, the data appear to demonstrate that the magnitude of the problem is not as severe as has been witnessed at many similar sites. On-site impacts generally appear to be in the areas adjacent to the dispenser islands and current UST cluster. Wells located across Grand Avenue to the west and southwest have shown periodic evidence of trace concentrations of certain gasoline components. Groundwater is present at shallow depth beneath the site, and appears generally to flow towards the west and southwest.

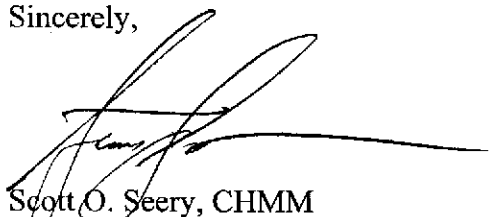
Mr. Dana G. Parry
RE: 29 Wildwood Ave. and 1246 Grand Ave., Piedmont
May 18, 1999
Page 2 of 2

It is possible that soil and groundwater resources beneath the Property have been impacted to some extent by the gasoline release at the subject Shell site. It is not anticipated, however, that such impact, if present, would be significant. Further, potential human health risks for inhabitants at the Property are also not anticipated as a result of the gasoline release at the subject Shell site. This position is based on the technical data presented to date, trends in contaminant distribution and migration controls these data appear to demonstrate, and reported construction characteristics of the Property's residence.

Based on the current information made available to this office, we conclude that groundwater and soil pollution detected on and beneath the subject Shell site is not the likely result of activities or releases from the Property, but, rather, from a release or releases occurring at the subject Shell site. We do not intend to pursue enforcement action against a property owner whose land overlies contaminated soil or groundwater if that contamination is solely the result of the migration of contaminants from an off-site source. Consequently, this office does not intend to name current or future owners of the Property as "responsible parties" with respect to this issue.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Karen Petryna, Equiva Services LLC, P.O. Box 6249, Carson, CA 90749-6249

FACSIMILE FORM

LAW OFFICES OF DANA G. PARRY
1200 CONCORD AVENUE, SUITE 200
CONCORD, CALIFORNIA 94520
TELEPHONE: (925) 825-4424 • FACSIMILE: (925) 689-1535
•E-MAIL ADDRESS: LODGP@AOL.COM

TO: Mr. Scott O. Seery

FROM: Dana G. Parry

COMPANY: Alameda County Health Agency

DATE: May 14, 1999

FAX NO: (510) 337-9335

NUMBER OF PAGES (INCL. COVER): 5

RE: 1246 Grand Avenue, Piedmont, California

Attached, please find letter of even date.

*If you have any questions or experience any difficulty with receipt of this transmission,
please call (925) 825-4424. Thank you.*

This transmission is intended for the sole use of the individual and entity to whom it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. Please be advised that any dissemination, distribution or duplication of this transmission by someone other than the intended addressee or its designated agent is strictly prohibited. If your receipt of this transmission is in error, please notify this firm immediately by collect call and send the original transmission to us by return mail at the above address. Thank you.

LAW OFFICES OF DANA G. PARRY

1200 CONCORD AVENUE, SUITE 200
CONCORD, CALIFORNIA 94520
(925) 825-4424

FACSIMILE:
(925) 689-1535
E-Mail Address: LODGP@AOL.com

May 14, 1999

VIA FACSIMILE: (510) 337-9335

Mr. Scott O. Seery, CHMM
Hazardous Materials Specialist
Alameda County Health Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

Subject: Property at 1246 Grand Avenue, Piedmont, California

Dear Mr. Seery:

Thank you for taking the time to meet with me and Dr. David Theis of the Ann Martin Children's Center. My client, Mr. Jon Q. Reynolds, is currently under contract to purchase the above referenced property (the "Subject Property"). The Subject Property has been used as a residential property and for no other purpose. It is Mr. Reynolds intent to acquire the Subject Property and lease it to the Ann Martin Children's Center, immediately adjacent to the North of the Subject Property. As we discussed, immediately to the South of the Subject Property is a Shell branded service station located the corner of Wildwood Boulevard and Grand Avenue, and otherwise commonly known as 29 Wildwood Avenue, Piedmont (the "Shell Station").

The Shell Station appears to be located down gradient from the Subject Property. It is our understanding that the ground water under the Shell Station contains minor amounts of contaminates below action levels and the ground water is subject to a monitoring program (your case No. 1107). Out of an abundance of caution and in anticipation of the fact that we may need to explain the ground water situation on the Shell Station to a potential lender for the Subject Property, I am writing to request that you please provide us with a comfort letter that states (to the extent possible) that:

1. From your review of the records it would appear that the ground water underneath the Subject Property has not been adversely impacted by the activity on the Shell Station site;
2. The conditions currently existing under the Shell Station appear to be contained and localized under the Shell Station site and that the Shell Station site is down gradient from the Subject Property;
3. The existence of any contaminates in the ground water or soil underneath the Shell Station site do not pose any risk to the health or safety of any person using or occupying the Subject Property; and

Mr. Scott O. Seery, CHMM

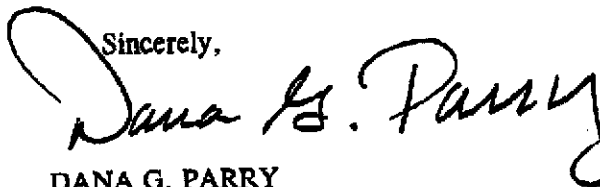
May 14, 1999

Page 2

4. The County will not pursue any enforcement action against the owner or tenant of the Subject Property for remediation of any conditions underlying the Subject Property arising out of the activity on the Shell Station site.

Thank you for your kind attention in this regard. Your efforts on our behalf are greatly appreciated.

Sincerely,



DANA G. PARRY

DGP/ngj

cc: Mr. Jon Q. Reynolds
Dr. David Theis

LEGAL DESCRIPTION

1246 Grand Avenue Piedmont

REAL PROPERTY in the City of Piedmont, County of Alameda, State of California, described as follows:

A portion of Lot 92, as said Lot is shown on the Map entitled "Nova Piedmont, Piedmont, California", filed December 18, 1913, in Book 28 of Maps, at Page 49, in the Office of the County Recorder of Alameda, bounded as follows:

Beginning at a point on the eastern line of Grand Avenue distant thereon north $13^{\circ}45'$ east 85.27 feet from the western extremity of that certain curve having a radius of 25.00 feet, which connects the said line of Grand Avenue with the northwestern line of Wildwood Avenue, as said Avenues and curve are shown on said Map; running thence along the said line of Grand Avenue, north $13^{\circ}45'$ east 53.99 feet; thence northerly along the eastern line of Fairview Avenue, as said Avenue is shown on said Map, along the arc of a curve to the right with a radius of 100.00 feet, tangent to the said last mentioned course, a distance of 2.18 feet; thence south $60^{\circ}08'$ east 80.73 feet to a point on the eastern line of said Lot 92; thence along the said last mentioned line south $17^{\circ}58'$ west 33.85 feet to a point on the southern line of said Lot 92; thence along the said last mentioned line north $76^{\circ}15'$ west 75.09 feet to the point of beginning.

A.P. N

EXHIBIT A

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

May 4, 1999

STID 1107

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

RE: Shell Service Station, 29 Wildwood Avenue, Piedmont

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: 29 Wildwood Avenue, Piedmont

May 4, 1999

Page 2 of 2

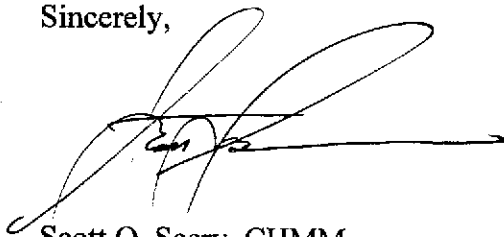
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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,

A handwritten signature in black ink, appearing to read "Scott O. Seery", with a long horizontal flourish extending to the right.

Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

SAMPLE LETTER (2): LIST OF LANDOWNERS FORM

Name of local agency
Street address
City

SUBJECT: CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR (*Site Name and Address*)

(Note: Fill out item 1 if there are multiple site landowners. If you are the sole site landowner, skip item 1 and fill out item 2.)

1. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

2. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (*name of primary responsible party*), certify that I am the sole landowner for the above site.

Sincerely,

Signature of primary responsible party

Name of primary responsible party

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

Name of local agency
Street address
City

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY
FOR *(Site Name and Address)*

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, *(name of primary responsible party)*, certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners



ENVIRONMENTAL HEALTH SERVICES

1121 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 867-6780
TDD: (510) 867-6785 (TAX)

August 17, 1998

STID 1107

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

RE: Shell Service Station, 29 Wildwood Avenue, Piedmont

Dear Mr. Perez:

I have recently taken over management of this case from Ms. Pamela Evens of this office. A cursory review of the case file reveals that downgradient well MW-4 has not been sampled nor monitored since July 1996. The July 28, 1998 Cambria Environmental Technology, Inc. 2nd quarter 1998 report indicates this well was "inaccessible" during the May 1998 sampling event, as well as the January and October 1997 events.

This issue was brought to Shell's attention in correspondence from this office dated April 8, 1998, a full five weeks before the May event. Two years without data from this sample location is unacceptable.

We expect that Shell or their agents will ensure that this well is accessible for all future sampling events.

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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

April 8, 1998

Alex Perez
Shell Oil Products Company
P.O. Box 40223
Concord CA 94524

**RE: Groundwater Investigation and Monitoring
Shell Station, 29 Wildwood Av., Piedmont CA 94611 (our site # 1107)**

Dear Mr. Perez:

I have assumed case responsibility for the above referenced Shell Station. I recently discussed the 1997 fourth quarter sampling report with Maureen Feineman of Cambria Environmental. I have the following comments about Shell's groundwater monitoring and investigation activities:

- TPHg and BTEX concentrations are dropping or at least stabilizing in all wells being tested. However, MW-4 has not been tested in over a year. Is there an access problem, or was testing discontinued by agreement with this Office?
- At this time, MTBE has become a focus of concern. Concentrations have dropped in the two closest down gradient wells (MW-2 and MW-3). However, MTBE was detected for the first time in the up gradient well (MW-1) and in an off site well (MW-5) in October 1997. MW-4 has not been sampled recently. Please continue a semi-annual monitoring schedule for MW-1, MW-5 and, if possible, MW-4. You may drop to a yearly testing schedule for MW-2 and MW-3.
- Chlorinated compounds were mentioned in a June, 1996 letter from Weiss Associates. The letter states that HVOCs were found in MW-4 and MW-5. Additional information about the presence of HVOCs in groundwater beneath the site is needed. I understand that a dry cleaning facility may be located near the station, however, the onsite waste oil tank is another possible source. Our file notes show that shortly after we received a copy of the Weiss Associates letter, we instructed the consultant to include HVOCs in future groundwater analyses. However, our file contains no subsequent reports of HVOC sampling. Please test all wells for HVOCs in the next sampling event.
- Please include a narrative evaluation of the effectiveness of your bioremediation activities in future reports.
- There was a long delay between the last sampling event (October 24, 1997) and the arrival of the monitoring report at this Office (March 25, 1998). Please submit monitoring reports within 45 days after field work is completed.

You may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Dick Pantages, Alameda County Environmental Health Services
Maureen Feineman, Cambria Environmental Technology, 1144 65th St., Suite B, Oakland 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



March 18, 1998

Jeanine Kennedy
Shell Products Co.
P. O. Box 8080
Martinez, California 94553

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

Subject: Revised operating permit for underground storage tanks located at Piedmont Shell, 29 Wildwood Avenue, Piedmont CA 94610

Dear Ms. Kennedy:

This letter is intended to guide, the owner/operators, in the proper management of the underground storage tanks (USTs) and to describe actions necessary for compliance with the permit conditions.

The installed system at the above location includes three -10,000 gallon single wall fiberglass tanks containing motor vehicle fuel. During the recent modification to the system, containment was installed around the three turbines with sensors to shut down the turbine if liquid is detected in the sump. Dispenser containment pans were added in order to contain a release at the dispenser and de-energize the dispenser if liquid is detected. Electronic line leak detectors now monitor the single wall fiberglass pressure piping. The line leak detectors monitor the lines for a release greater than 3.0 gallons per hour and 0.2 gallon per hour monthly. The turbines will automatically shut down if a leak is detected or the monitoring system is de-energized.

The waste oil tank is a 550 gallon double wall fiberglass with an interstitial sensor. All external piping to the waste oil tank was removed. The tank is now filled directly through a vertical drop directly into the tank from a container of less than 25 gallon capacity. Overfill prevention is utilized with the in-tank gauge using the audible/visual alarm.

Compliance with the following conditions is a requirement of the permit to operate:

1. Perform leak detection on the tanks using the in-tank gauge at least monthly. Provide a hard copy print out and maintain on site for three years.
2. Perform annual operational tests on the electronic monitoring equipment by qualified technicians. The anniversary month for certification is March. A copy of the certification shall be submitted to this office.

Piedmont Shell
29 Wildwood Avenue
Piedmont
page 2 of 2

3. Perform monthly monitoring on pressure piping at 0.2 gph and maintain hard copy reports on-site for three years.
4. Maintain a copy of the five year operating permit and operating conditions on-site.
5. Complete employee training and document such training at least annually.
6. Report unauthorized releases to this office within 24 hours of discovery. Provide written reports within 5 working days.
7. Maintain records of **all** maintenance performed on the tank system. All changes in monitoring equipment must be pre-approved by this office prior to implementation.
8. Report changes in facility operator or tank owner on Form A within 30 days of the change.
9. Maintain written records of all alarm conditions resulting from a product release or potential release.
10. Maintain certification of financial responsibility with documentation on-site.

This permit expires on November 18, 1998. Requests for renewal of the permit should be made in writing 30 days prior to expiration. If you have any questions regarding the operation of this tank system please contact me at (510) 567-6781.

Sincerely,



Robert Weston
Sr. Hazardous Materials Specialist

enclosures

c: Noel Coffin, Operator
Ariu Levi, ACDEH
file



ENVIRONMENTAL
PROTECTION
96 JUN 14 AM 8:26

June 12, 1996

Jennifer Eberle
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577

1107

RE: STID #1107
Shell Service Station
WIC #204-6001-0109
29 Wildwood Avenue
Piedmont, California
WA Job #81-0463-106

Dear Ms. Eberle:

On behalf of Shell Oil Products Company, Weiss Associates (WA) is responding to your letter dated May 13, 1996 regarding the Shell service station referenced above. As your letter states, I spoke with Dale Klettke of your agency on October 4, 1995 about future site options. On October 17, 1996, after discussing these options with Shell, I proposed to Mr. Klettke that continued semiannual ground water monitoring was the most appropriate action. He seemed to agree based on the following reasons that we discussed:

- Only ground water from well MW-3, the well adjacent to the underground fuel tanks, consistently contains petroleum hydrocarbons above California Department of Health Services maximum contaminant levels, indicating that the extent of subsurface hydrocarbons is limited only to the area immediately surrounding the tanks;
- Benzene concentrations in ground water from well MW-3 have ranged only up to 610 ~~480~~ parts per billion (ppb). Given the site conditions, these concentrations do not pose a significant threat to human health or regional ground water quality;
- Trichloroethene, tetrachloroethene, and trans-1,2-dichloroethene have been detected in ground water from off site wells MW-4 and MW-5, indicating that shallow ground water beneath Grand Avenue is already degraded by a solvent plume.

In fact, based on WA's recent review of the site's historical data and the current emphasis among state regulatory agencies to reduce action at low risk ground water sites, WA recommends that your agency allow annual ground water monitoring at this site. Shell's 24 sampling events since 1989 have clearly shown that hydrocarbon concentrations are stable and that the extent of dissolved petroleum hydrocarbons is limited to the area around the underground tanks. Therefore, WA

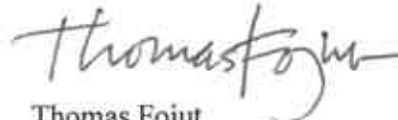
Jennifer Eberle
June 12, 1996

2

believes that future monitoring is only necessary to verify that petroleum hydrocarbons do not migrate further and that concentrations do not increase significantly.

I trust this letter satisfies your request and look forward to discussing WA's request for annual sampling. Please call me at (510) 450-6120 with any questions or comments.

Sincerely,
Weiss Associates



Thomas Fojut
Project Hydrogeologist

TF:tf
K:\office\com\m\m\1181001

cc: R. Jeff Granberry, Shell Oil Products Company, PO Box 4023, Concord, California 94524
Dale Klettke, Alameda County Environmental Health Services, 1131 Harbor Bay Parkway,
#250, Alameda, California 94502-6577

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, DIRECTOR

May 13, 1996
STID 1107

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

Attn: Jeff Granberry
Shell Oil Co.
PO Box 4023
Concord CA 94524

RE: Shell Service Station, 29 Wildwood Ave., Piedmont CA 94610

Dear Mr. Granberry,

Since my last letter to Shell Oil Co., dated 4/11/95, I have received the following documents:

- 1) letter from Tom Fojut of Weiss, dated 7/16/95 (status report);
- 2) Groundwater Monitoring Well Abandonment report, prepared by Weiss, dated 8/21/95;
- 3) Third Quarter 1995 report, prepared by Weiss, dated 9/14/95; and
- 4) First Quarter 1996 report, prepared by Weiss, dated 4/9/96.

Deep water well E-4 has been properly abandoned. The remainder of the wells (MW1 through MW5) are being sampled and monitored during the first and third quarters.

It has been noted that concentrations of TPH-g and BTEX have not shown decreasing trends in MW3 since 7/93, and possibly earlier. This was discussed by telephone between Dale Klettke of this office (during my absence) and Tom Fojut of Weiss on 10/4/95. The file notes indicate that they discussed implementing a low cost system to attenuate concentrations in the vicinity of MW3. File notes also indicate that Tom Fojut would discuss this with Shell Oil Co., and report back to Alameda County. It is unknown what the outcome was. **Please contact me regarding this issue within 30 days.** I can be reached directly at 510-567-6761; our fax number is 510-337-9335.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Tom Fojut, Weiss Associates, 5500 Shellmound St., Emeryville CA 94608
Acting Chief/file

je.1107-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
ALAMEDA COUNTY-ENV. HEALTH DEPT.
ENVIRONMENTAL PROTECTION DIV.
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

April 11, 1995
STID 1107

Attn: Dan Kirk
Shell Oil Co.
PO Box 4023
Concord CA 94524

RE: Shell Service Station, 29 Wildwood Ave., Piedmont CA 94610

Dear Mr. Kirk,

I am in receipt of the Fourth Quarter 1994 report, prepared by Weiss Associates, dated 12/28/94. This report documents the sampling and monitoring activities conducted on 10/6/94. Page 2 of the report indicates a request for a reduced sampling frequency. Table 3 specifies the reduction in the sampling frequency. **This request is acceptable with the exception of MW1; it should also be sampled semi-annually.** (I am also in receipt of the First Quarter 1995 report, prepared by Weiss Associates, dated 3/10/95. Table 3 reflects this change.) **Please bring future requests to my attention by way of cover letter and/or a telephone call. I can respond in a more timely manner, and can prioritize my work appropriately if I am properly informed.**

I contacted Mike Maley of Weiss on 3/7/95 to discuss the sampling frequency reduction. In addition, we discussed the need to properly abandon well E4, because it is screened in the deep aquifer, and may act as a conduit to contamination.

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335.

You are encouraged to submit reports on double-sided paper in order to save trees.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Jennifer Eberle'.

Jennifer Eberle
Hazardous Materials Specialist

cc: Mike Maley, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608
Ariu Levi/file

je.1107

STATE WATER RESOURCES CONTROL BOARD

DIVISION OF CLEAN WATER PROGRAMS

2014 T STREET, SUITE 130

P.O. BOX 944212

SACRAMENTO, CALIFORNIA 94244-2120

(916) 227-4307

(916) 227-4530 FAX



JUN 16 1994

JTB
5740-1107

Shell Oil Company
P. O. Box 4848
Anaheim, CA 92803

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 004990, FOR SITE ADDRESS: 29 Wildwood Avenue,
Piedmont, CA 94610

The State Water Resources Control Board (SWRCB) takes pleasure in issuing the attached Letter of Commitment in an amount not to exceed **\$150,000**. This Letter of Commitment is based upon our review of the corrective action costs incurred to date and your application received on January 17, 1992 and may be modified by the SWRCB in writing by an amended Letter of Commitment.

The SWRCB will take steps to withdraw this Letter of Commitment after 90 calendar days from the date of this transmittal letter unless you proceed with due diligence with your cleanup effort. This means that you must take positive, concrete steps to ensure that corrective action is proceeding with all due speed. For example, if you have not started your cleanup effort, you must obtain three bids and sign a contract with one of these bidders within 90 calendar days. If your cleanup effort has already started and was delayed, you must resume the expenditure of funds to ensure that your cleanup is proceeding in an expeditious manner. You are reminded that you must comply with all regulatory agency time schedules and requirements. We constantly review the status of all active claims, and failure to proceed with due diligence will be grounds for withdrawal of this Letter of Commitment.

You should read the terms and conditions listed in the Letter of Commitment. Also attached you will find:

- A "Reimbursement Request Instructions" package. You should retain this package for future reimbursement requests. Among other information, the package includes instructions for completion of the "Reimbursement Request" form and the "Spreadsheet". These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in these instructions are samples of Reimbursement Request forms and completed Spreadsheets. Within the package also included are:
 - A "Bid Summary Sheet" to document data on bids received.
 - Recommended Minimum Invoice Cost Breakdown.
 - A "Certification of Non-Recovery From Other Sources" which must be returned before any reimbursements can be made.
- "Reimbursement Request" forms which you must use to request reimbursement of costs incurred.
- "Spreadsheet" forms which you must use in conjunction with your Reimbursement Request.
- "Vendor Data Record" (Std. Form 204) which must be completed and returned with your first Reimbursement Request.

If you have any questions regarding the Letter of Commitment or the Reimbursement Request package, please contact Blessy Torres at (916) 227-4535.

Sincerely,

Dave Deaner, Manager
Underground Storage Tank
Cleanup Fund Program

Attachments

cc: California Regional Water Quality
Control Board, San Francisco Bay Region
Attn: Steven Ritchie
2101 Webster Street, Suite 500
Oakland, CA 94612

Alameda County EHD
Attn: Ed Howell
80 Swan Way, Room 200
Oakland, CA 94621

LETTER OF COMMITMENT FOR REIMBURSEMENT OF COSTS

CLAIM NO: 004990

AMENDMENT NO: 0

CLAIMANT: Shell Oil Company

BALANCE FORWARD: \$0

CO-PAYEE: None

THIS AMOUNT: \$150,000

Attn: P. Pugnale

CLAIMANT ADDRESS: P. O. Box 4848
Anaheim, CA 92803

NEW BALANCE: \$150,000

TAX ID / SSA NO.: 13-1299891

Subject to availability of funds, the State Water Resources Control Board (SWRCB) agrees to reimburse Shell Oil Company (Claimant) for eligible corrective action costs at Piedmont Shell 29 Wildwood Avenue, Piedmont, CA 94610 (Site). The commitment reflected by this Letter is subject to all of the following terms and conditions:

1. Reimbursement shall not exceed \$150,000 unless this amount is subsequently modified in writing by an amended Letter of Commitment.
2. The obligation to pay any sum under this Letter of Commitment is contingent upon availability of funds. In the event that sufficient funds are not available for reasons beyond the reasonable control of the SWRCB, the SWRCB shall not be obligated to make any disbursements hereunder. If any disbursements otherwise due under this Letter of Commitment are deferred because of unavailability of funds, such disbursements will promptly be made when sufficient funds do become available. Nothing herein shall be construed to provide the Claimant with a right of priority for disbursement over any other claimant who has a similar Letter of Commitment.
3. All costs for which reimbursement is sought must be eligible for reimbursement and the Claimant must be the person entitled to reimbursement thereof.
4. Claimant must at all times be in compliance with all applicable state laws, rules and regulations and with all terms, conditions, and commitments contained in the Claimant's Application and any supporting documents or in any payment requests submitted by the Claimant.
5. No disbursement under this Letter of Commitment will be made except upon receipt of acceptable Standard Form Payment Requests duly executed by or on behalf of the Claimant. All Payment Requests must be executed by the Claimant or a duly authorized representative who has been approved by the Division of Clean Water Programs.
6. Any and all disbursements payable under this Letter of Commitment may be withheld if the Claimant is not in compliance with the provisions of Paragraph 5 above.
7. Neither this Letter of Commitment nor any right thereunder is assignable by the Claimant without the written consent of the SWRCB. In the event of any such assignment, the rights of the assignee shall be subject to all terms and conditions set forth in this Letter of Commitment and the SWRCB's consent.
8. This Letter of Commitment may be withdrawn at any time by the SWRCB if completion of corrective action is not performed with reasonable diligence.

IN WITNESS WHEREOF, this Letter of Commitment has been issued by the SWRCB this 19th day of May, 1994.

STATE WATER RESOURCES CONTROL BOARD




Weiss Associates

5500 Shellmound Street, Emeryville, CA 94606-2411

Environmental and Geologic Services

Fax: 510-547-5043 Phone: 510-547-5420

FAX TRANSMITTAL

CONFIDENTIALITY NOTICE

This facsimile transmission contains confidential information intended only for use by the individual or entity named below. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or action taken in reliance on the contents of this transmittal is strictly prohibited. If you have received this transmittal in error, please call us immediately to arrange for the return of the original document.

TO: Jennifer Eberle

 FAX PHONE: ⁵⁶⁴⁻⁴⁷⁵⁷~~360-3706~~

 COMPANY: Alameda County Department
of Environmental Health

BUSINESS PHONE: 271-4320

DATE: February 12, 1993

FROM: Tom Fojut

PROJECT #: 81-463-100

 SUBJECT: STID #1107
Shell Service Station
29 Wildwood Avenue
Piedmont, California

 # OF PAGES: 1
(including this cover)

 Hard copy to follow if checked

COMMENTS & ACTIONS REQUIRED:

Jennifer:

This note is to update you on our progress with the proposed monitoring well installation on Grand Avenue for the site referenced above. The Oakland Engineering Services Department is requiring several items, including drawings, a fee, a copy of the grant deed for the station property and a certificate of insurance, before they will grant an encroachment permit. The Department will then draft an agreement for Shell to sign. We expect that obtaining the permit will take some time, and therefore we cannot yet schedule the well installation. I will notify you when we finally obtain the permit. Please call me at 450-6120 if you have any questions or comments.

cc: Dan Kirk, Shell Oil Company (via fax: 675-6172)

How long?

Please call Paul at (510) 547-5420 if you do not receive all the pages.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 23, 1992

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 1107

Shell Oil Co.
PO Box 5278
Concord CA 94520
Attn: Dan Kirk

RE: Shell Service Station
29 Wildwood Av.
Piedmont CA 94610

Dear Mr. Kirk,

We are in receipt of a letter report dated 9/29/92 by your consultant, Weiss Associates (WA). This letter summarizes the site's history and **does not recommend** groundwater or soil remediation for reasons therein stated; only quarterly groundwater monitoring is recommended. We are also in receipt of boring logs for the site; this information was submitted by WA under transmittal letter dated 10/13/92.

We do not agree with your arguments for no remediation in the 9/29/92 letter report for the following reasons:

1. The gasoline detected in MW3 may be the tail end of a larger plume. This plume may be following preferential pathways such as the utility lines in the street(s) and/or the sandy gravelly layers in the site vicinity, which vary from approximately 5 to 15 feet bgs, according to the boring logs. The lateral extent of the plume has not been defined to the satisfaction of this office.
2. The onsite gradient of .03 ft/ft is sufficient to move the plume downgradient and offsite in a direction likely parallel to Grand Avenue.
3. Offsite monitoring wells MW4 and MW5 are not sufficient to characterize a downgradient plume. The groundwater elevation contours are drawn in such a fashion as to direct groundwater from the site to MW4 and MW5. (See Fig. 2 in 9/22/92 letter report). Note that the offsite groundwater elevation contours are dashed, indicating that groundwater flow was deduced by inference. An equally likely scenario for groundwater flow is along the east side of Grand Avenue. Although the presence of utilities in Grand Ave. were cited as a reason for not being able to install another well, it is possible to site a well in the sidewalk of Wildwood Ave. at or near the corner or Grand Ave.

Dan Kirk
STID 1107
Page 2 of 2
October 23, 1992

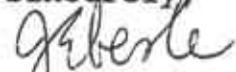
We requested a workplan to define the lateral and vertical extent of soil and groundwater contamination by letter dated 6/29/92. We then requested a remediation workplan for soil and groundwater by letter dated 8/18/92. Your consultant responded by recommending no further assessment or remediation. We have outlined the reasons why we do not agree with WA's rationale for no further assessment or remediation. Shell has not thus far provided any means to prevent migration of the plume offsite. Therefore, we require that you submit a workplan for the delineation of soil and groundwater contamination, including interim plume control measures **within 40 days or by December 3, 1992.**

The information obtained from this investigation will be utilized in a viable Corrective Action Plan, as per Article 11 of 23CCR. As per 23 CCR Section 2653, "owners and operators shall (2) prevent further migration of the released substance into surrounding soils and groundwater." As per 23 CCR Section 2724, "The responsible party shall conduct investigations of the unauthorized release, the release site, and the surrounding area. . .if. . .(4) the regulatory agency requests an investigation. ."

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b).

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State Water Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to Rich Hiett, San Francisco Bay Region, Regional Water Quality Control Board, 2101 Webster St., Ste 500, Oakland CA 94612. If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Scott MacLeod, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608-2411
Rich Hiett, RWQCB
[Redacted] /Pife

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



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

August 18, 1992

STID 1107

Shell Oil Co.
PO Box 5278
Concord CA 94520
Attn: Dan Kirk

RE: Shell Service Station
29 Wildwood Ave.
Piedmont CA 94610

Dear Mr. Kirk,

We are in receipt of a letter dated 8/11/92 from Weiss Associates (WA) in response to our letter dated 6/29/92. WA does not recommend further investigation at this time. They indicate that the extent of hydrocarbons has been defined in previous investigations.

A background review for this site indicates that up to 6,500 ppm TPH-g was detected in soil samples collected at 10 feet bgs from soil borings located adjacent to the existing fuel USTs (Ensco, 1988). Apparently, this soil contamination was never addressed. In addition, elevated concentrations of petroleum hydrocarbons have existed in groundwater since 1990. MW3 contained 6,000 ppb TPH-g and 480 ppb benzene during the second quarter of 1992. Therefore, we request a remediation workplan for soil and groundwater **within 45 days** of the date of this letter, or by **October 3, 1992**.

All reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All proposals, reports, and analytical results pertaining to this investigation and remediation must be sent both to our office and to:

Rich Hiatt
RWQCB, San Francisco Bay Region
2101 Webster St., Suite 500
Oakland CA 94612

If you have any questions, please contact Jennifer Eberle at 510-271-4320.

Dan Kirk
STID 1107
Page 2 of 2
August 18, 1992

Sincerely,

Susan L. Hugo

Susan Hugo
Senior Hazardous Materials Specialist

cc: David Elias, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608-2411
Rich Hiett, RWQCB
~~File~~

je

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

June 29, 1992

STID 1107

Shell Oil Co.
PO Box 5278
Concord CA 94520
Attn: Dan Kirk

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

RE: Shell Service Station
29 Wildwood Ave.
Piedmont CA 94610

Dear Mr. Kirk,

The case file for the above referenced site has been reassigned to Jennifer Eberle, Hazardous Materials Specialist. Please forward future correspondence to her attention.

A subsurface investigation was conducted at this site in July 1989, in which soil borings and groundwater monitoring wells were sampled. Up to 710 ppm TPH was detected in soils. (It is unknown when or why the wells were installed.) Since the third quarter of 1990, groundwater beneath the site has been contaminated with elevated concentrations of TPH-g and benzene. Monitoring well #3 (MW3) has generally shown the highest concentrations. These concentrations have actually been **increasing** since 1990. In the second quarter of 1992, MW3 contained 6,000 ppb TPH-g and 480 ppb benzene.

According to our files, the underground storage tanks on site are single walled and were installed in 1984. Quarterly Inventory records submitted to our office have shown stick readings errors and/or inventory variations which exceeded the allowable limits in the 4th quarter of 1988, 1st, 2nd, 3rd and 4th quarters of 1989, 1st and 2nd quarters of 1990, and 1st and 3rd quarters of 1991.

There seems to be a problem at this site. It may be a leaking UST, pipeline, or an overspill during filling. Therefore, you are requested to submit a workplan addressing measures to adequately define the lateral and vertical extent of soil and groundwater contamination. Please respond to us **within 45 days** or by **August 13, 1992**. Although UST replacement is not mandated until 1998, tank removal in conjunction with remediation may be an option worthy of consideration in light of the situation outlined above.

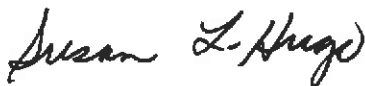
Dan Kirk
STID 1107
Page 2 of 2
June 29, 1992

All reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All proposals, reports, and analytical results pertaining to this investigation and remediation must be sent both to our office and to:

Rich Hiatt
RWQCB, San Francisco Bay Region
2101 Webster St., Suite 500
Oakland CA 94612

If you have any questions, please contact Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo
Senior Hazardous Materials Specialist

cc: David Elias, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608-2411
Rich Hiatt, RWQCB
File

je

UCR attached

Shell Oil Company



90 JUN 21 AM 11:53

EAST BAY
MARKETING DISTRICT

P.O. Box 4023
Concord, CA 94524
(415) 676-1414

June 19, 1990

Mr. Gil Wistar
Hazardous Materials Specialist
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, CA 94621

Subject: Response to June 8, 1990 Letter Requesting Technical Reports
for Shell Sites; 29 Wildwood Ave, Piedmont; 230 West
MacArthur, Oakland; 999 San Pablo, Albany

Dear Mr. Wistar:

In response to your June 8, 1990 letter requesting reports on the
subject sites, the following summary of information is provided.

230 West MacArthur, Oakland

A hydropunch survey was already performed on May 18 - 19 offsite and
downgradient of the site in order to determine the best location for
additional wells. A copy of the plan showing hydropunch locations is
attached. Based on this information a plan will be prepared to complete
the investigation. Shell's consultant, Exeltech, will contact you
directly regarding the specifics of the work plan.

999 San Pablo, Albany

The work proposed by Gettler-Ryan in a January 25, 1990 workplan was
completed on January 29-30, 1990 as previously discussed. The report
you are missing was submitted to your office on April 3, 1990. I have
attached a copy of the cover letter which documents this fact. Another
report is due to be submitted on this site within the next two weeks. A
copy of the earlier report will be provided along with it.

An unauthorized release form was already submitted on December 12, 1989.
A copy of the form is attached. I have notified Gettler-Ryan to pay the
required \$375 deposit.

* 29 Wildwood, Piedmont

The work proposed by Weiss Associates in their September 25, 1989 report was completed on January 24, 1990, after a delay in obtaining encroachment permits from the City of Oakland. All wells were sampled on January 30, 1990 and April 27, 1990. A report detailing these activities will be submitted by June 25, 1990.

An unauthorized release form was submitted by Shell engineer Ray Newsome. A copy of the form is attached. I have notified Weiss Associates to pay the required \$375 deposit.

If you have any questions, please contact me at (415) 676-1414, extension 127.

Very truly yours,



Diane M. Lundquist
District Environmental Engineer

cc: Howard Hatayama, DOHS
Lester Feldman, RWQCB
Gil Jensen, District Attorney, Alameda County
Rafat Shahid, Asst. Agency Director
John Werfal, Gettler Ryan
Randy Stone, Exeltech
Joe Theisen, Weiss Associates

d1017001

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK)/CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO		STATE TANK ID # _____	
REPORT DATE M M D D Y Y		LOCAL CASE # _____		REGIONAL BOARD CASE # _____	
US EPA ID # _____		NAME OF INDIVIDUAL FILING REPORT RAY NEWSOME		PHONE (415) 676-1414	
SIGNATURE <i>(Signature)</i>		REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD		COMPANY OR AGENCY NAME SHELL OIL COMPANY	
ADDRESS P. O. BOX 4023		CITY CONCORD		STATE CALIF.	
STREET		ZIP 94524			
RESPONSIBLE PARTY NAME SHELL OIL COMPANY		<input type="checkbox"/> UNKNOWN CONTACT PERSON RAY NEWSOME		PHONE (415) 676-1414	
ADDRESS P. O. BOX 4023		CITY CONCORD		STATE CALIF.	
STREET		ZIP 94524			
FACILITY NAME (IF APPLICABLE) SHELL STATION		OPERATOR NOEL D. COFFIN		PHONE (415) 654-0512	
ADDRESS 29 WILDWOOD AVE.		CITY PIEDMONT		COUNTY ALAMEDA	
STREET		ZIP 94610			
CROSS STREET		TYPE OF AREA <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> RURAL <input type="checkbox"/> OTHER _____		TYPE OF BUSINESS <input checked="" type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER _____	
LOCAL AGENCY AGENCY NAME		CONTACT PERSON		PHONE	
REGIONAL BOARD SAN FRANCISCO BAY REGION		TOM CALLAGHAN		(415) 464-0787	
TSCD				()	
SUBSTANCE INVOLVED (1)		CAS # (ATTACH EXTRA SHEET IF NEEDED) NAME		QUANTITY LOST (GALLONS) _____ <input checked="" type="checkbox"/> UNKNOWN	
SUBSTANCE INVOLVED (2)				_____ <input type="checkbox"/> UNKNOWN	
DATE DISCOVERED M M D D Y Y		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> ROUTINE MONITORING <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> OTHER: _____			
DATE DISCHARGE BEGAN M M D D Y Y		<input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> REPLACE TANK <input type="checkbox"/> CLOSE TANK	
HAS DISCHARGE BEEN STOPPED? <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE M M D D Y Y		<input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURES <input type="checkbox"/> OTHER _____			
SOURCE(S) OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER (SPECIFY) _____		TANKS ONLY/CAPACITY 550 GAL AGE _____ YRS. <input type="checkbox"/> UNKNOWN MATERIAL <input type="checkbox"/> STEEL <input type="checkbox"/> FIBERGLASS <input type="checkbox"/> OTHER _____		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> CORROSION <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER _____	
RESOURCES AFFECTED AT RISK		WATER SUPPLIES AFFECTED		THREAT- ENED UN- KNOWN # OF WELLS	
AIR (VAPOR) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO THREATENED <input type="checkbox"/> UNKNOWN <input type="checkbox"/>		PUBLIC DRINKING WATER <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input type="checkbox"/> UN- KNOWN <input checked="" type="checkbox"/> # OF WELLS _____			
SOIL (VADOSE ZONE) <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/>		PRIVATE DRINKING WATER <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input type="checkbox"/> UN- KNOWN <input checked="" type="checkbox"/> # OF WELLS _____			
GROUNDWATER <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input type="checkbox"/> UNKNOWN <input checked="" type="checkbox"/>		INDUSTRIAL <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input type="checkbox"/> UN- KNOWN <input checked="" type="checkbox"/> # OF WELLS _____			
SURFACE WATER OR STORM DRAIN <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO THREATENED <input type="checkbox"/> UNKNOWN <input type="checkbox"/>		AGRICULTURAL <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input type="checkbox"/> UN- KNOWN <input checked="" type="checkbox"/> # OF WELLS _____			
BUILDING OR UTILITY VAULT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO THREATENED <input type="checkbox"/> UNKNOWN <input type="checkbox"/>		OTHER (SPECIFY) <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input type="checkbox"/> UN- KNOWN <input type="checkbox"/> # OF WELLS _____			
OTHER (SPECIFY) <input type="checkbox"/> YES <input type="checkbox"/> NO THREATENED <input type="checkbox"/> UNKNOWN <input type="checkbox"/>		GROUNDWATER BASIN NAME <input checked="" type="checkbox"/> UNKNOWN			
COMMENTS: <i>(Signature)</i>					

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

June 8, 1990

Ms. Diane Lundquist
Shell Oil Co.
P.O. Box 4023
Concord, CA 94524

Re: Request for technical reports for three Shell sites: 230
MacArthur Blvd., Oakland; 29 Wildwood Ave., Piedmont; and 999 San
Pablo Ave., Albany

Dear Ms. Lundquist:

In reviewing my files recently, it came to my attention that I do not have the reports and technical information I should on the three sites listed above. I will treat each of the sites, including our requirements for technical submittals, individually.

230 MacArthur Blvd., Oakland

The newest monitoring well installed at this site, MW-4, shows an increasing trend of hydrocarbon contamination. Although only two samples have been taken from this well (January 23 and March 8, 1990), TPH levels have increased from 1.6 ppm to 4.2 ppm. None of the other monitoring wells show any contamination. Well MW-4 appears to be downgradient of the tank cluster and the lower pump island, indicating that one of these areas is likely to be the source of contamination. This warrants further investigation, both to pinpoint the actual source and to define the local limits of a possible plume. Please submit a work plan that addresses these questions within 30 days, i.e., no later than July 9, 1990. This work plan should be submitted to this office and to the Regional Water Quality Control Board (attn: Lester Feldman), and must include a schedule for implementation of various tasks.

29 Wildwood Ave., Piedmont

In a report dated September 25, 1989, Weiss Associates recommended the following actions at this site:

- the installation of three soil borings, as well as downgradient and off-site monitoring wells;
- the sampling of all wells; and
- the preparation of a report summarizing results.

The need for this additional investigative work was reiterated in one of the quarterly meetings between Shell Oil Co. and this office.

Ms. Diane Lundquist
June 8, 1990
Page 2 of 3

According to our files, however, no report has been submitted since September 1989. Therefore, assuming that the work Weiss recommended has in fact been completed, we are requiring that Shell submit a report to this office and to the RWQCB by **June 25, 1990**. This report must summarize results to date, discuss site hydrogeology in some detail, and present recommendations and a schedule for further action. If the work recommended by Weiss has not been accomplished, then such a report is due on **July 23, 1990**. As in all other leak cases, quarterly sampling and reporting of all wells must be done.

In addition, according to the records, Shell has not submitted an Unauthorized Release Report to this office. Please complete and submit this form to our office immediately. Finally, we will need a deposit in the amount of \$375, made out to Alameda County, to cover our costs for site review. Please send this along with the report discussed above, or sooner if possible.

999 San Pablo Ave., Albany

Gettler-Ryan found floating product in observation wells at this site in April 1989. This office advised Shell of the need to act immediately to investigate the situation, and as a result Shell apparently contracted with Gettler-Ryan/GeoStrategies to drill 7 soil borings and 3 monitoring wells at the site (a total of 10 holes). According to the work plan, these tasks were to be completed by February 9, 1990, with a report available by March 30. However, as of the date of this letter, we have not received the report. Please submit this report to this office and to the RWQCB by **June 25, 1990**. This report should include the following elements:

1. a summary of site work and results;
2. a discussion of the likely source(s) of contamination, based on analytical results; and
3. recommendations for further work, including a schedule for implementing this work.

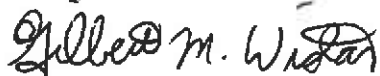
As in the case above, please submit a deposit of \$375 for county oversight of the site, as well as an Unauthorized Release Report.

Because we are overseeing each of these sites under the designated authority of the RWQCB, this letter constitutes a formal request for technical reports, according to Sec 13267 of the Water Code. Additionally, local implementing agencies now have direct authority to require technical reports and implementation schedules, under Sec. 25299.36 of the California Health and Safety Code.

Ms. Diane Lundquist
June 8, 1990
Page 3 of 3

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

cc: Howard Hatayama, DOHS
Lester Feldman, San Francisco Bay RWQCB
Gil Jensen, District Attorney, Alameda County Consumer and
Environmental Protection Agency
Rafat A. Shahid, Asst. Agency Director, Env. Hlth.
files (3 sites)