

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 5-31-06

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

May 30, 2006

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

Subject: Fuel Leak Case No. RO0002745, Shell#13-5032, 1601 Webster Street, Alameda, CA –
Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the document entitled, "Risk Evaluation and Work Plan," dated May 17, 2006, prepared on Shell's behalf by Cambria Environmental Technology. The "Risk Evaluation and Work Plan," recommends the installation of two shallow groundwater monitoring wells (S-8 and S-9) and one deeper monitoring well (S-4B). Screening of utility corridors and the kiosk using a photoionization detector are also proposed. ACEH concurs with the proposed scope of work.

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

TECHNICAL COMMENTS

1. **Geologic Cross Sections.** Geologic cross section A-A', which was presented in the "Soil and Groundwater Investigation Report," dated January 31, 2006, was useful in presenting the site stratigraphy and three-dimensional distribution of contamination in a direction generally perpendicular to the groundwater flow direction. Please present Cross section A-A' and one additional cross section, oriented approximately parallel to the groundwater flow direction, in the Soil and Groundwater Investigation Report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to the Alameda County Environmental Health ftp site as described below, according to the following schedule:

- **August 15, 2006** - Quarterly Monitoring Report for the Second Quarter 2006
- **October 10, 2006** – Soil and Groundwater Investigation Report
- **November 15, 2006** - Quarterly Monitoring Report for the 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).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

Mr. Denis Brown
May 30, 2006
Page 3

UNDERGROUND STORAGE TANK CLEANUP FUND

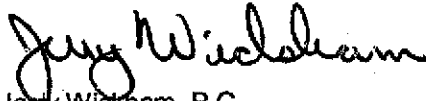
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Ana Friel
Cambria Environmental Technology, Inc.
270 Perkins Street
Sonoma, CA 9540

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
02-23-06

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

February 22, 2006

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

Subject: Fuel Leak Case No. RO0002745, Shell#13-5032, 1601 Webster Street, Alameda, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the report entitled, "Soil and Groundwater Investigation Report," dated January 31, 2006, prepared on Shell's behalf by Cambria Environmental Technology. The report describes the results of a site investigation conducted between October 31 and November 3, 2005 to characterize the extent of soil and groundwater contamination. Based on results from six soil borings and six cone penetrometer (CPT) borings, the report concluded that the maximum concentrations of total petroleum hydrocarbons as gasoline (TPHg) are centered near the UST complex, maximum benzene concentrations are found south of the dispenser islands, and maximum MTBE concentrations are found at the northeastern property boundary. The report concluded that the dissolved fuel hydrocarbons found on-site and off-site are the result of multiple releases. Dissolved fuel hydrocarbons were detected at elevated concentrations in depth-discrete groundwater samples collected off-site beneath Webster Street. MTBE was also detected at elevated concentrations in an off-site well (MW-6) approximately 225 feet northeast of the site. The report included several recommendations for additional work, which are discussed in the technical comments below.

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

TECHNICAL COMMENTS

1. **Well MW-1 on Unocal Site.** ACEH concurs with the recommendation to include well MW-1, located on the Unocal site to the north, in quarterly monitoring for the Shell site. Please include the results in the quarterly monitoring reports requested below.
2. **Geologic Cross Sections.** Geologic cross section A-A' was useful in presenting the site stratigraphy and three-dimensional distribution of contamination in a direction generally perpendicular to the groundwater flow direction. Following further plume delineation, please consider the preparation of one additional cross section oriented approximately parallel to the groundwater flow direction.

3. **Monthly Extraction.** ACEH does not object to discontinuing monthly vacops from well TBW-N. Continued monthly gauging for separate phase hydrocarbons (SPH) and sampling of TBW-N will take place for a minimum of one quarter. If the SPH returns or if the concentrations of fuel hydrocarbons increase significantly in well TBW-N or downgradient wells, monthly vacops or another interim remedial option is to be implemented.
4. **Screening-Level Risk Evaluation and Work Plan.** ACEH concurs with the recommendation to perform a screening-level risk evaluation and to prepare a work plan to complete plume delineation as requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to the Alameda County Environmental Health ftp site as described below, according to the following schedule:

- **May 1, 2006** - Quarterly Monitoring Report for the First Quarter 2006
- **May 10, 2006** – Screening-Level Risk Evaluation and Work Plan
- **August 1, 2006** - Quarterly Monitoring Report for the Second Quarter 2006

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

ELECTRONIC SUBMITTAL OF REPORTS

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

Mr. Denis Brown
February 22, 2006
Page 4

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

Sincerely,

A handwritten signature in cursive script that reads "Jerry Wickham".

Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Ana Friel
Cambria Environmental Technology, Inc.
270 Perkins Street
Sonoma, CA 9540

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-8-05

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

August 8, 2005

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

Dear Mr. Brown:

Subject: Fuel Leak Case No. RO0002745, Shell#13-5032, 1601 Webster Street, Alameda, CA

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the work plan entitled, "Site Investigation Work Plan," dated July 13, 2005, prepared on Shell's behalf by Cambria Environmental Technology. We generally concur with the work proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Depth-discrete Groundwater Samples.** The Work Plan indicates that targeted intervals for groundwater sampling in the proposed soil borings may be adjusted based on the soil types. We request that the CPT data be used to target zones with higher hydraulic conductivity for groundwater sampling in each of the proposed borings.

TECHNICAL REPORT REQUEST

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

- **November 1, 2005** - Quarterly Report for the Third Quarter 2005
- **December 19, 2005** - Subsurface Investigation Report
- **February 1, 2006** - Quarterly Report for the Fourth Quarter 2005

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

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following:

Mr. Denis Brown
August 8, 2005
Page 2

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

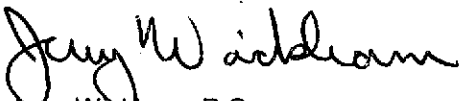
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Ana Friel
Cambria Environmental Technology, Inc.
270 Perkins Street
Sonoma, CA 9540

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

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5-13-05

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

May 13, 2005

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

Dear Mr. Brown:

Subject: Fuel Leak Case No. RO0002745, Shell#13-5032, 1601 Webster Street, Alameda, CA

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Soil and Groundwater Investigation Report," dated February 18, 2005, prepared by Cambria. An electronic copy of this report was received on the Geotracker website. Please submit one hard copy of this report for ACEH files. The Soil and Groundwater Investigation Report presented the results of soil and groundwater sampling conducted between November 30, 2004 and February 4, 2005. Soil and groundwater samples were collected from eight of ten proposed soil borings on site. The soil and groundwater sampling was conducted in accordance with the "Soil and Groundwater Investigation Work Plan and Agency Response," dated November 30, 2004 with the variances discussed below.

The investigation at the subject site is being conducted in response to an unauthorized fuel release that occurred at the site on August 19, 2004. Interim remediation activities that include product removal and groundwater extraction have been ongoing since August 19, 2004. Groundwater extraction is currently conducted monthly.

Based on ACEH staff review of the documents referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Conclusions – Impact to Soils.** The conclusion stated in the Soil and Groundwater Investigation Report, that the August 2004 fuel release did not significantly impact soils requires qualification based on the data presented. Although, total petroleum hydrocarbons as gasoline (TPHg) were not detected in the soil samples collected downgradient from the USTs, soil samples have not been collected from the immediate vicinity of the tank pit. Based on the release and recovery of product from the tank pit, a significant impact to soils in the immediate area of the tank pit is likely to have taken place. TPHg has been detected in groundwater samples from tank backfill well TBW-N at concentrations ranging from 57,000 to 160,000 micrograms per liter ($\mu\text{g/L}$). Based on these relatively high concentrations in groundwater and typical sorption properties for soil, TPHg can be expected to be sorbed to soil in the immediate vicinity of the tank pit. Although GWE has been conducted periodically for several months from the tank backfill wells, high concentrations of TPHg, toluene, and

xylene have continued to be detected in groundwater samples from well TBW-N, indicating that a source of TPHg is present in the immediate vicinity of the tank pit.

- 2. Conclusions - Vertical Characterization.** We agree with the conclusion in the Soil and Groundwater Investigation Report that the vertical distribution of hydrocarbons in groundwater cannot be fully described based on existing data. Due to refusal for hand-auger clearance on several attempts, two of the proposed borings could not be advanced. Depth-discrete groundwater samples were to have been collected at first encountered groundwater, 10 feet below grade (fbg), and 15 fbg from each boring. Due to slow recharge, groundwater samples were collected from 10 fbg at only one location. Depth-discrete groundwater samples were not collected from first encountered groundwater. Instead, groundwater samples were collected from the top of the water column in well screens that extended to a depth of approximately 15 fbg.

The highest concentration of methyl tert-butyl ether detected in groundwater was 24,000 µg/L in the sample collected 15 fbg from boring SB-1. Since groundwater samples were not collected at depths greater than 15 fbg, additional vertical delineation is needed to define the vertical extent of contamination. Please include your plans for defining the vertical extent of contamination in the Work Plan requested below.

- 3. Conclusions - Source of MTBE.** Since the hydraulic gradients previously observed at the site are generally consistent with an on-site source for the TPHg and MTBE observed in boring SB-1, discussion of an off-site source of MTBE does not appear to be supported by site conditions.
- 4. Installing Monitoring Wells On-site.** We agree with the recommendation to install monitoring wells on-site since the only existing monitoring wells at the site are within the tank backfill. Please include your plans to install monitoring wells on-site in the Work Plan requested below.
- 5. Collecting Additional Samples from Borings for the Proposed Wells.** We agree with the recommendation to collect soil samples from all borings for the proposed wells and depth discrete groundwater samples from first encountered groundwater in all locations and at 15 fbg at locations where samples were not previously collected at 15 fbg. Please include your plans for conducting these activities in the Work Plan requested below.
- 6. Surveying and Concurrent Gauging.** Surveying all wells and conducting concurrent groundwater gauging and monitoring to assess area-wide gradients and concentrations is to be conducted as recommended. Please include your plans to conduct these activities in the Work Plan requested below.
- 7. Preferential Pathways.** We agree with the recommendation in the Soil and Groundwater Investigation Report that the potential for off-site migration via the 8-inch sanitary sewer in Webster Street requires evaluation. However, we do not agree that the evaluation of potential preferential pathways should be conducted after groundwater gradient and chemical data from the monitoring wells are available. Previous data at the site have consistently shown a hydraulic gradient to the north to northeast. Sufficient chemical data are available from the Soil and Groundwater Investigation Report to plan an investigation of preferential pathways. ACEH requests that other utilities along Webster Street in addition to the 8-inch

sanitary sewer be considered. A sanitary sewer line is shown on the site plan for the site extending from the station building beneath the USTs to Webster Street. Please provide additional information on the potential for this sanitary sewer line to be a preferential pathway for contamination from the UST tank pit. Please include your plans to conduct the evaluation of preferential pathways in the Work Plan requested below. We request that you immediately pursue off-site access agreements that you may need to complete your investigation activities.

8. **Conducting Groundwater Extraction and Sampling Well TBW-N.** We agree that monthly GWE and sampling of well TBW-N should be continued until a further evaluation of site conditions is conducted.
9. **Off-site Characterization.** The highest concentration of MTBE detected in groundwater at the site was detected in the groundwater sample collected at 15 fbg from boring SB-1 in the northeastern corner of the site. Please provide your plans for delineating the lateral and vertical extent of MTBE in groundwater.

TECHNICAL REPORT REQUEST

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

- **July 15, 2005** - Work Plan for Subsurface Investigation
- **July 15, 2005** - Quarterly Report for the Second Quarter 2005
- **October 17, 2005** - Quarterly Report for the Third Quarter 2005
- **January 17, 2006** - Quarterly Report for the Fourth Quarter 2005

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

PERJURY STATEMENT

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Mr. Denis Brown
May 13, 2005
Page 4

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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UNDERGROUND STORAGE TANK CLEANUP FUND

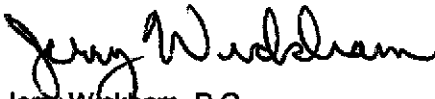
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AGENCY OVERSIGHT

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Mr. Matthew Derby
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
10-27-04

October 28, 2004

Ms. Karen Petryna
20945 S. Wilmington Ave.
Carson, CA 90810

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

Dear Ms. Petryna:

Subject: Fuel Leak Case RO0002745, Alameda Shell #13-503, 1610 Webster St.,
Alameda, CA 94502

Alameda County Environmental Health staff is aware of the accidental release of approximately 2084 gallons of petroleum fuel from the rupture of an underground storage tank, occurring on August 19, 2004 at the referenced site. We are aware that immediate emergency response activities were performed to collect the fuel, which had discharged to the shallow groundwater beneath the site. Because of the emergency status of this site and other potential risks the release may have caused, our office requested an informational update in my September 2, 2004 e-mail. Five items, consistent with Article 5 of CCR, Title 23, Division 3, Chapter 16, UST Regulations, Release Reporting and Initial Abatement Requirements, were requested. It appears that there was confusion as to the due date for the requested information. You apparently were waiting for a formal request for this information, presumably with specified due dates. Although no written request was sent by our office, reports required by Article 5 apparently have not been submitted to our office ie 2652 (c) requires a full written report within five working days of detecting an unauthorized release and 2655 (e) requires a free product removal report within 45 calendar days of release confirmation.

In response to our office's e-mail inquiry regarding the requested items, your October 21, 2004 e-mail provided all information to date from your consultant. Unfortunately, the e-mails were limited to a collection of data, lacking any discussion or interpretation and it is unacceptable in its current state.

We request that you address the following technical comments in the technical report, which you have committed to submit by November 30, 2004.

TECHNICAL COMMENTS

List of items initially requested and clarification:

1. Summary of estimates of release and recovery volumes of gasoline. Supporting data, calculations and manifests for free product disposal should be provided.
2. Summary of amounts of groundwater removed from the site and estimated future removal amounts. Manifests for disposal should be presented. Groundwater

October 28, 2004
Ms. Karen Petryna
1610 Webster St., Alameda, CA 94502
Page 2

analyses has consisted of TPHg, BTEX and MTBE. Please also include the analysis of the other ether oxygenates, lead scavengers and ethanol. Please confirm the formulation of the fuel currently being used at this site.

3. Utilities and preferential pathway survey. Could storm, sanitary or other utility lines be acting as preferential pathways? Submit a map and cross-section(s) showing the depth and location of all utility lines and trenches within and near the site and anticipated plume are.
4. Sensitive receptor survey, any nearby homes, basements, domestic or municipal wells? The survey should also include any destroyed or environmental wells within a ½ radius of the site. Your initial results failed to supply this information for known UST sites within this radius. The monitoring wells at the former Tosco station at 1629 Webster would be of particular interest to see if the release was detected as an increase in concentrations in their monitoring well network.
5. What other interim remediation can be done at the site? (We) suggest at least cleaning out and extracting from the other tank backfill wells. It appears that the previous groundwater extraction has been from the north backfill well only. Can the other wells be used for extraction? How often and for how long will this interim remediation continue?

Contaminant Plume Definition

6. We request that you perform a detailed, expedited site assessment using depth discrete sampling techniques on borings installed along transects to define and quantify the full three dimensional extent of MTBE, TPHg, BTEX and other contaminants. Please pursue any off-site access agreements necessary to complete your investigation. Based upon the results of your assessment, your investigation report should recommend an appropriate monitoring well network.

Local Hydrogeology and Groundwater Flow Conditions

7. Please provide a summary of the groundwater flow conditions at the site. This should include past data from this site and neighboring sites and include such things as cross sections and rose diagrams.

Technical Report Request

Please submit the following technical reports according to the following schedule:

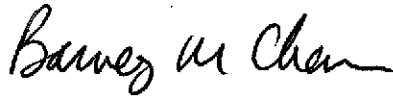
- November 30, 2004- Summary report addressing all items (1-7) including your work plan for plume definition.

October 28, 2004
Ms. Karen Petryna
1610 Webster St., Alameda, CA 94502
Page 3

- 180 days after work plan approval- Soil and Groundwater Investigation report.
- February 28, 2005 – Quarterly update of site

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, D. Drogos, R. Weston, B. Schultz
M. Derby, Cambria Environmental, 5900 Hollis St., Suite A, Emeryville, CA 94608
1601Webster 10_28_04

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



PO 367, PO 495
PO 2744, PO 254
PO 2745, PO 1042

July 13, 1999

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

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

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

Dear Ms. Mattis:

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

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

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

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

Sincerely,

Robert Weston
Sr. Hazardous Materials Specialist

enclosure

c: Tom Peacock, ACDEP

Shell Stations with Single Wall Fiberglass USTs

Alcosta Shell 8999 San Ramon Road Dublin CA 94568

Bay Super Shell 1800 Powell Street Emeryville CA 94608

Alameda Shell 1601 Webster Street Alameda CA 94501

Bayview Shell 1784 150th Avenue San Leandro CA 94578

Piedmont Shell 29 Wildwood Avenue Piedmont CA 94610

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R01042

✓ R02745

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

February 5, 1993

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

STID 3014

RE: 1601 Webster St., Alameda, California

Dear Mr. Kirk,

This office has received and reviewed your letter, dated February 2, 1993, proposing the installation of an additional monitoring well. The proposed location for this well is acceptable to this office. It is the understanding of this office that this well will be installed within the next 60 days. A work plan, documenting the details of the work performed, shall be submitted within 45 days after completing field activities.

This well shall be installed, developed, and sampled in the same manner as the existing wells have been. This includes the requirement for soil samples to be collected at 5-foot intervals and lithologic changes, with a minimum of one soil sample being analyzed.

Weiss Associates has proposed to conduct a literature search to identify any existing off-site monitoring wells nearby the site. If no existing wells are identified and accessible for sampling south of the former pump island, you will be required to address the further delineation, of the contamination identified in MW-2, BH-F, BH-E.

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

Sincerely,

A handwritten signature in cursive script, appearing to read 'Juliet Shin'.

Juliet Shin
Hazardous Materials Specialist

Mr. Dan Kirk
Re: 1601 Webster St.
Page 2 of 2
February 5, 1993

cc: Richard Hiatt, RWQCB

Scott MacLeod
Weiss Associates
5500 Shellmound Street
Emeryville, CA 94608-2411

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



✓ R02745

R01042

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 19, 1992

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

STID 3014

RE: Response to work plan for the site located at 1601 Webster Street, Alameda, California

Dear Mr. Kirk,

This office received the work plan, dated August 17, 1992, regarding the proposal for drilling six to ten soil borings at the site to investigate the extent of soil and ground water contamination near the trench and to determine whether or not this area is the possible source of observed ground water contamination at the site. Locations for only three out of the six to ten proposed soil borings were given in the work plan. These three boring locations are acceptable for evaluating whether the re-paved area is a source of contamination. However, pursuant to Section 2724 and 2725 of Article 11, Title 23 California Code of Regulations, you are also required to determine the full vertical and lateral extent of all soil and ground water contamination resulting from the site. Therefore, it is advised that some of the additional three to seven proposed soil borings be placed in areas that may aid in determining the full extent of soil and/or ground water contamination. Areas that would appear to warrant further investigations, other than the trench area, would appear to be the area around MW-1, the area downgradient of the current pumps, product lines, and underground storage tanks, and the area near the former pump island.

The soil and ground water samples collected must be analyzed for cis-1,2-dichloroethene, methylene chloride, 1,1,1-trichloroethane, and 1,2-dichloroethane, in addition to Total Petroleum Hydrocarbons as gasoline, Total Oil and Grease, and benzene, toluene, ethylbenzene, and xylenes. The above VOCs were observed in ground water samples formerly collected from on-site monitoring wells.

This office has understood the proposed soil borings to be an intermediate step in the soil and water investigation phase of the required corrective action at the site. Please keep in mind that additional monitoring wells will be required for the delineation of the ground water contaminant plume.

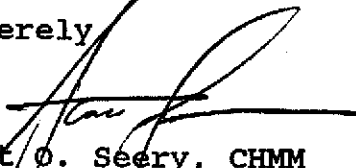
Mr. Dan Kirk
Re: 1601 Webster St.
August 19, 1992
Page 2 of 2

Additionally, you were requested by this office in a previous letter, dated June 17, 1992, to address the remediation of the contaminant plume and to include a timetable giving the schedule of work events. These points were not addressed in the above work plan. You are required to submit a work plan addressing these points and proposals for additional investigative work to delineate the extent of soil and ground water contamination resulting from the site. This work plan will be due within 60 days after implementing the soil boring proposal and obtaining the sampling results. In this way, the soil boring investigation can aid in determining a strategy for subsequent investigative and remedial activities.

Field work should commence within 60 days of the receipt of this letter. Please be reminded that a report documenting the results from work performed is due to this office within 45 days of completion of field activities. Quarterly monitoring and reporting is to be continued for all three monitoring wells.

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

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Robert La Grone, Alameda Fire Dept.

Scott MacLeod
Weiss Associates
5500 Shellmound Street
Emeryville, CA 94608-2411

Mark Thompson, Alameda County District Attorney's Office

Edgar Howell-File (JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



✓ R02745

✓ R01042

RAFAT A. SHAHID, Assistant Agency Director

June 17, 1992

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

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

STID 3014

RE: Investigations at the currently active Shell Service Station,
located at 1601 Webster Street, Alameda, California

Dear Mr. Kirk,

In 1987, a 550-gallon waste oil tank was removed from the site. A soil sample collected from the native soil beneath the tank identified 113 parts per million (ppm) Total Oil and Grease (TOG). Additionally, a ground water sample collected from the tank pit exhibited 132 ppm Total Petroleum Hydrocarbons (TPH) and 244 ppm TOG.

Since the time of the tank pull, a total of three wells have been installed at the site and monitored quarterly for over two years. Although ground water samples collected from Well S-1, located immediately downgradient of the former tank pit, has never exhibited concentrations of contaminants above detection limits, ground water samples collected from Well MW-2, located upgradient of the former tank pit, has consistently identified elevated concentrations of TPH as gasoline and benzene as high as 8,100 ppb and 450 ppb on site. Additionally, Well MW-1, another upgradient well, has consistently exhibited concentrations of 1,2-dichloroethene as high as 7.9 ppb.

You are required to submit a work plan to this office within 45 days of the receipt of this letter addressing the delineation and remediation of the contaminant plume beneath the above site. Please include a timetable giving the schedule of work events. These proposals must adhere to the Regional Water Quality Control Board's (RWQCB) Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, the State Water Board's LUFT manual, and be consistent with the corrective action requirements set forth under Article 11, Section 2670 et seq., of Title 23, California Code of Regulations. Copies of all plans and proposals should be sent to this office for approval.

Please be aware that you must continue to prepare quarterly ground water monitoring reports and submit them to this office.

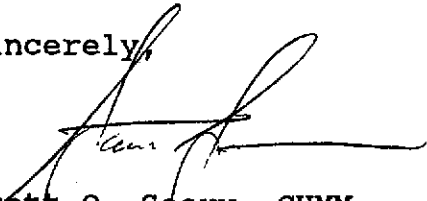
Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267 (b). Any

Dan Kirk
RE: 1601 Webster St.
June 17, 1992
Page 2 of 2

extensions of the stated deadlines or modifications of the required tasks must be confirmed in writing by either this agency or RWQCB.

If you have any questions or comments, please contact Ms. Juliet Shin at (510) 271-4320.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Richard Quarante, Alameda Fire Dept.

David Elias
Weiss Associates
5500 Shellmound Street
Emeryville, CA 94608-2411

Ed Howell-File (JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



VR02745
R01042

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

April 2, 1990

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

RE: Underground Tank Issuance of Five Year Permit

Dear Ms. Foster:

An underground tank inspection was conducted at Kin's Shell located at 1601 Webster Street, Alameda, CA 94501 on February 1, 1990 by Susan Hugo of our department.

The California Code of Regulations, Title 23, Chapter 3, Subchapter 16, Underground Tank Regulations, Section 2712(c) requires that you submit to this department, a copy of the quarterly inventory monitoring report (October thru December, 1989).

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

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

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

Sincerely,

Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:SH:sh

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Ken Lottinger, Area Manager, Shell Oil Co.
Mr. Kin Chan, Dealer
Susan Hugo, Hazardous Materials Specialist
Katherine Chesick, Hazardous Materials Specialist
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02745

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

(12)

June 24, 1989

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

Dear Mr. Theisen:

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

ALAMEDA

2160 Otis Dr.

(R02433)
(R02893)

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

1601 Webster

(R01042)
(R02745)

Same information

HAYWARD

1097 W. Tennyson

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

LIVERMORE

(R0769)
(R02525) 318 S. Livermore

No record of tank pull

1155 Portola

(R01054)
(R02566)

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

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

809 E. Stanley No record of tank pull

(R02524)

SAN LEANDRO

1784 - 150th No record of tank pull

(R0367)

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

(R0156)

OAKLAND

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

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

(R0349)

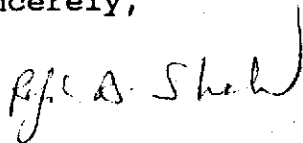
If the above tanks were pulled, we would request that you provide us with copies of any lab results from soil samples taken, manifest of the tanks or contaminated soil removed, etc.

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

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

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

Sincerely,



Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:EH:mnc

cc: Edgar Howell, Alameda County Hazardous Materials Program
Files