

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 18, 2006

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

Subject: Fuel Leak Case No. RO0002855, Shell #13-5693, 3600 Park Blvd., Oakland, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the report entitled, "Subsurface Investigation and Groundwater Monitoring Report," dated March 27, 2006. The report presents the results of soil and groundwater sampling conducted in January 2006 from eight soil borings and four monitoring wells. The report states that hydrocarbon impact to soil is minimal except in the vicinity of the northwestern dispensers (D-1 and D-2). MTBE was detected in grab groundwater samples collected from boring SB-8 at concentrations of 3,400 micrograms per liter ($\mu\text{g/L}$) at a depth of 32 feet bgs and 3,800 $\mu\text{g/L}$ at a depth of 50 feet bgs. Boring S-8 and monitoring well MW-8, which was installed in boring SB-8, are downgradient of the USTs and dispensers. A groundwater sample collected from monitoring well MW-8 also contained MTBE at a concentration of 592 $\mu\text{g/L}$. The report recommends the continuation of groundwater monitoring on a quarterly basis at the site. ACEH concurs with the continuation of quarterly groundwater monitoring in order to evaluate TPHg and MTBE concentrations in the shallow groundwater and in the deeper interval from 40 to 50 feet bgs. The quarterly groundwater monitoring data are to be used to assess the need for additional site characterization.

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

TECHNICAL COMMENTS

1. **Groundwater Monitoring.** The four monitoring wells are to be sampled on a quarterly basis and analyzed for total petroleum hydrocarbons as gasoline, BTEX, fuel oxygenates, 1,2-dichloroethane, and ethanol. Please present the results of the groundwater sampling in the quarterly monitoring reports requested below.
2. **Vertical Hydraulic Gradient and Vertical Delineation.** Well MW-8, which is screened from 40 to 50 feet bgs, is 12 to 20 feet deeper than the other three monitoring wells at the site. Static water levels in well MW-8 are 9 to 10 feet lower than water levels in the other wells, indicating that the vertical hydraulic gradient is likely downward. Additional vertical delineation may be required due to the detection MTBE at a concentration of 3,800 $\mu\text{g/L}$ in the lowest grab groundwater sample, collected at 50 feet bgs from boring SB-8. Please use the quarterly monitoring data to assess fuel hydrocarbon concentrations in the deeper interval

and the need for additional vertical delineation at the site. Please present this assessment and recommendations no later than the Quarterly Monitoring Report for the Fourth Quarter 2006 requested below.

3. **Grab Groundwater Sampling Results.** Groundwater samples collected from wells should not be assumed to be, "more accurate indicators of impact to site's groundwater," as stated in the report. Empirical studies as well as three-dimensional numerical simulations have shown that the groundwater samples collected from wells represent groundwater flux from the entire length of the well screen with higher permeability zones having a higher flux. Water entering the well from different zones may have a range of contaminant concentrations. Therefore, the contaminant concentration measured in the sample represents the averaging effects due to vertical mixing throughout the screen interval. In addition, where a well partially penetrates an aquifer, the zone that is monitored extends above and below the screen. Grab groundwater samples are collected from shorter intervals and therefore, typically represent less vertical mixing. The contaminant concentrations measured in grab groundwater samples most likely are accurate with respect to the actual groundwater concentration within the targeted interval of the aquifer. Therefore, the concentrations measured in grab groundwater samples should not be discounted as less accurate when compared to concentrations measured in samples from monitoring wells. The vertical heterogeneity of the aquifer and the vertical distribution of water flowing into a well screen must be considered.

TECHNICAL REPORT REQUEST

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

- **August 15, 2006** - Quarterly Monitoring Report for the Second Quarter 2006
- **November 15, 2006** - Quarterly Monitoring Report for the Third Quarter 2006
- **February 15, 2007** - Quarterly Monitoring Report for the Fourth 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 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.

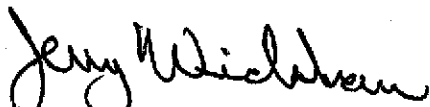
Denis Brown
April 18, 2006
Page 4

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

| | |
|---|---|
| Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) | ISSUE DATE: July 5, 2006 |
| | REVISION DATE: December 16, 2005 |
| | PREVIOUS REVISIONS: October 31, 2005 |
| SECTION: Miscellaneous Administrative Topics & Procedures | SUBJECT: Electronic Report Upload (ftp) Instructions |

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is preferable that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements must be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in Excel format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



BENT
9-22-05

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

September 22, 2005

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

Subject: Fuel Leak Case No. RO0002855, Shell #13-5693, 3600 Park Blvd., Oakland, CA –
Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Subsurface Investigation and Monitoring Well Installation Work Plan," dated September 14, 2005. The Work Plan proposes eight borings and monitoring well installation to investigate the lateral and vertical extent of petroleum hydrocarbons in soil and groundwater beneath the site. ACEH concurs with the proposed scope of work.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL REPORT REQUEST

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

- **February 16, 2006 – Soil and Groundwater Investigation Report**

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

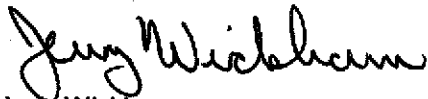
AGENCY OVERSIGHT

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

Denis Brown
September 22, 2005
Page 3

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
7-28-05

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

July 27, 2005

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

Subject: Fuel Leak Case No. RO0002855, Shell#13-5689, 3600 Park Boulevard, Oakland, CA –
Request for Work Plan

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the report entitled, "Dispenser and Piping Upgrade Sampling Report," dated October 15, 2004, prepared for the above referenced site on behalf of Shell by Cambria Environmental Technology, Inc. The report summarizes the results from soil samples collected on August 20, 2004 during a dispenser upgrade. Soil samples were collected beneath four dispensers at depths of 4 to 5 feet below grade. Soil sample D-1-5, collected beneath dispenser D-1, contained 180 milligrams per kilogram (mg/kg) of total petroleum hydrocarbons (TPH) as gasoline and 2.3 mg/kg total xylenes. TPHg was not detected in soil samples collected beneath dispensers 2 and 3 and was detected at 30 mg/kg in the soil sample collected beneath dispenser 4.

The report also includes results from soil samples collected on February 20, 1998 during a previous dispenser upgrade. TPHg was detected at concentrations ranging from 180 to 2,703 mg/kg in three soil samples collected beneath dispensers 1 and 2 in 1998. In addition, benzene, toluene, ethylbenzene, and methyl tert-butyl ether (MTBE) were detected in all three soil samples collected beneath dispensers 1 and 2. MTBE was detected in 1998 at concentrations ranging from 1.6 up to 49 mg/kg. Based on the ability of MTBE to readily leach to groundwater, the detection of MTBE at relatively high concentrations in soil indicates the potential for groundwater at the site to be contaminated.

Please submit a work plan detailing your proposal to define the extent of soil and groundwater contamination by **September 28, 2005**. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

REQUEST FOR INFORMATION

ACEH's case files for the subject site contains only the report entitled, "Dispenser Upgrade Sampling Report," dated October 15, 2004. We request that you submit copies of any other reports you have documenting additional investigation activities or other work related to this UST system/site with the work plan requested below.

TECHNICAL REPORT REQUEST

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

- **September 28, 2005** – Work Plan for Soil and Groundwater Investigation

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.

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site.

At this time, we require that you submit a complete mailing list of all record fee title owners of the site by **June 27, 2005**, which states, at a minimum, the following:

A. *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:*

- OR -

B. *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.*

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

A. In accordance with Section 25297.15(a) 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)
 request for case closure
 local agency intention to make a determination that no further action is required
 local agency intention to issue a closure letter

- OR -

B. 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.

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

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 be aware that you may be eligible for reimbursement of the costs of investigation from the California Underground Storage Tank Cleanup Fund (Fund). In some cases, a deductible amount may apply. If you believe you meet the eligibility requirements, I strongly encourage you to call the Fund for an application.

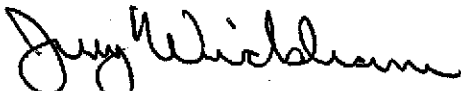
Mr. Denis Brown
July 27, 2005
Page 4

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2855

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02855

May 10, 1990

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

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

RE: Underground Storage Tank Permitting
Park Blvd. Shell, 3600 Park Blvd.,
Oakland, CA 94610

Dear Ms. Foster:

This letter is in regards to the issuance of a 5 year permit to operate the three underground storage tanks at the above mentioned facility. Our office had requested information pertaining to the quarterly inventory monitoring report (October thru December 1989) for the three underground tanks. We received the information we requested from Ms. Teena Smith of the Park Blvd. Shell.

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

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

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

Sincerely,


Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:SH:sh

Enclosures (2)

cc: Ken Lottinger, Shell Area Manager
Mr. Robert Smith, Dealer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R02855

April 5, 1990

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

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

RE: Underground Tank Issuance of Five Year Permit

Dear Ms. Foster:

An underground tank inspection was conducted at Park Blvd. Shell located at 3600 Park Blvd., Oakland, CA 94610 on January 30, 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 maintain daily inventory records on-site. The daily inventory records were not available upon inspection. Obtain the previous three years records and keep them in the facility.

Upon reviewing your quarterly monitoring report (October thru December 1989), it showed inventory swings exceeding the allowable levels specified in Section 2641 (5) (b). Please submit to this office an explanation in writing as to the cause of the variations and provide us copies of the summary of your last three months inventory records

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

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

Sincerely,


Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:SH:sh

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Ken Lottinger, Area Manager, Shell Oil Company
Robert Smith, Dealer
Files