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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

July 6, 2005

Mr. Mark Inglis Chevron Env. Mgmt. Company 6001 Bollinger Cyn. Rd., Room K2256 San Ramon, CA 94583-2324

Dear Mr. Inglis:

Subject: Fuel Leak Case RO0000427, Chevron Service Station #9-0076, 4265 Foothill

Blvd., Oakland, CA 94601

Alameda County Environmental Health staff has received and reviewed the August 26, 2004 *Soil Vapor Assessment Workplan* prepared by Cambria for the subject site. It is approved with the following technical comments. Please submit your technical report 60 days after completion of your investigation.

TECHNICAL COMMENTS

 We concur with the installation of 3 soil vapor probes with 3 discrete sampling points at each location. Please include the analysis of the ether oxygenates, ethanol and the lead scavengers in the vapor chemical analysis.

2. Please insure that any samples collected for physical parameters are taken in a non-impacted area.

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

Sincerely.

Barney M. Chan

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Hazardous Materials Specialist

C: files, D. Drogos

Mr. Robert Foss, Cambria Environmental, 5900 Hollis St., Suite A, Emeryville, CA 94608

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DAVID J. KEARS, Agency Director



SCNT 8-17- 2000-

RO # 427

August 15, 2000 StID # 103

Mr. Tom Bauhs Chevron Products Co. P.O. Box 6004 San Ramon, CA 94583 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Site Conceptual Model and Risk-Based Corrective Action Plan for Chevron Station 9-0076, 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Bauhs:

Our office has received and reviewed the July 28, 2000 Site Conceptual Model and Risk-Based Corrective Action Plan for the above site prepared by Delta Environmental Consultants (Delta). I have also spoke with Mr. Benjamin Heningburg, Project Geologist for Delta. As you are aware, this site formerly operated a groundwater extraction system from 1991-1993 from well C-2. This remediation had limited success in reducing the TPHg, BTEX and MTBE concentrations in this well. A sheen has recently been observed on this well, even with the addition of ORC socks to this well since 1998. The petroleum plume has migrated off-site, perhaps beneath the adjacent residential homes, across Bond St. and High St. and beneath the Albertson's Market parking lot.

Our office has discussed and raised the following issues and questions regarding the referenced report:

- Surface soil samples were not evaluated in the risk assessment. What soil samples were evaluated to arrive at this conclusion? Are there any surface soil sample results?
- How were the representative soil samples listed on the table Onsite Risk-Based Level and Site Specific Target Level Summary determined (1.2 mg/kg for benzene et al)?
- Given the current and expected future use of this site, why wasn't a commercial exposure pathway examined for on-site workers?
- The previously proposed utility survey should be performed. Please include this in your work plan.
- The residual soil area shown in Figure 5 may be significantly larger than what is shown.

The following comments are made regarding the recommendations in this report:

- A forthcoming work plan should be submitted to address the three recommendations. A
 figure should be sent showing the locations of the proposed soil vapor survey. The exact
 methodology of this sampling should be described as well as proposed soil vapor clean-up
 levels for the analytes sought.
- The method for over-purging the wells should be discussed. Will this include dual phase extraction of vapor and liquids? If so, how can you estimate the radius of influence of the extraction? Will you consider installing temporary borings to monitor the influence of the extraction?

Mr. Tom Bauhs 4265 Foothill Blvd., Oakland CA Chevron Station #9-0076 August 15, 2000 Page 2.

Your work plan should describe the method of adding ORC to the wells. Keep in mind, the past addition of ORC has not been successful. How will the treated wells be monitored to insure an unbiased sample?

It should be understood that should this remediation be shown to be ineffective, you will be requested to propose a more aggressive approach. Please submit your work plan for the proposed remediation to our office within 30 days or no later than September 18, 2000.

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

Sincerely,

Daug M Cha-Barney M. Chan

Hazardous Materials Specialist

C: B. Chan, files

Mr. B. Heningburg, Delta Environmental Consultants, 3164 Gold Camp Drive, Suite 200 Rancho Cordova, CA 95670

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

Mr. Dave DeWitt, Tosco Marketing Co., 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583

Ms. E. Myran, Albertson's Inc. P.O. Box 20, Boise, ID 83726

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RO427

ENVIRONMENTAL HEALTH SERVICES

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

August 5, 1999 StID # 103

Mr. Phil Briggs Chevron Products Co. 6001 Bollinger Canyon Rd. Building L, Room 1080 P.O. Box 6004 San Ramon, CA 94583-0904

Re: Chevron Station #9-0076, 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Briggs:

I have reviewed the recent monitoring results for the above site and your accompanying letter dated May 20, 1999. I have also received and reviewed Chevron's CRTC group interpretation of the bio-parameter charts. Although the anticipated trends may exist which are indicative of intrinsic bio-remediation, the concentrations of gasoline, BTEX and MTBE in groundwater have not stabilized or decreased. As you are aware, the levels of dissolved benzene on-site failed your Tier 2 RBCA, therefore, oxygen-releasing compound socks were added into a number of wells.

At this time, our office would like Chevron to consider enhancing the existing conditions for intrinsic bio-remediation. As a start, please determine whether the amount of oxygen being released from the ORC socks is sufficient to treat the estimated petroleum mass. If not, you might consider either adding additional ORC or removing mass.

Our office acknowledges the possibility that off-site sources may exist. Please investigate whether this potential exists by determining if preferential migration of contamination through existing conduits. At this time, the up-gradient service stations are or will be asked to address their own release aggressively.

Please respond to this letter within 30 days or by September 7, 1999.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, files

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

Mr. D. Dewitt, Tosco Oil Co., 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583

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AGENCY DAVID J. KEARS, Agency Director



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May 8, 2000 StID # 103

Mr. Brett Hunter Chevron USA Products 6001 Bollinger Canyon Rd., Bld L P.O. Box 6004 San Ramon, CA 94583-0804

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

Re: Former Chevron Service Station 9-0076, 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Hunter:

I have received and reviewed the April 28, 2000 1st Quarter 2000 Monitoring report for the above site as prepared by Blaine Tech Services. This report documents the March 9, 2000 sampling event. It appears that conditions at this site have changed from that when our office concurred with groundwater monitoring only as the recommended remedial approach. Significant changes have occurred in groundwater elevation, contaminant concentrations and bio-indicator measurements. This situation may have been recognized had your consultant provided a recommendation and conclusion section within their quarterly reports. Our office has on several occasions requested this information from you to no avail.

The following observations are of particular concern:

- From 12/99 to 3/00, groundwater elevation has increased significantly in wells, no well exhibiting a greater change than C-1, which increased nearly 8'. The resulting increase in TPHg, BTEX and MTBE is indicative of shallow soil contamination.
- There has been an increase in benzene concentration in well C-4, the well closest to the nearby residences. Please determine if this presents a risk to the these residents under the exposure pathway, volatilization to indoor air.
- The concentration of TPHg and BTEX in C-7 increased significantly, indicating that natural attenuation may not be occurring as anticipated.
- The concentration of dissolved oxygen in wells C-2 and C-4, the well with ORC socks, is not any higher than the non-ORC wells, indicating that these socks are spent. Please evaluate the need to add additional ORC socks, ORC injection or other type of enhanced bioremediation chemical. You are aware that Equiva Services is considering some type of chemical oxidant addition to address their own TPH release, a potential off-site source to this Chevron site.

Please respond to this letter in writing within 30 days or no later than June 9, 2000.

Mr. Brett Hunter 4265 Foothill Blvd., Oakland 94601 May 8, 2000 StID # 103 Page 2.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Baues Un Cha

C: B. Chan, files

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

Mr. D. Dewitt, Tosco Oil Co., 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583

Ms. Barbara Russell, American Stores Properties, Inc., 299 South Main St., Salt Lake City, UT 84111-2203

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HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

February 2, 1999 StID # 103

Mr. Phil Briggs Chevron Products Co. 6001 Bollinger Canyon Rd. Building L, Room 1110 P.O. Box 6004 San Ramon, Ca 94583-0904 Ro#427

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

Re: Chevron Service Station #9-0076, 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Briggs:

This letter serves to comment on the recent evaluation of the bio-parameters and request further clarification on the previously submitted risk assessment for the above site. As you are aware, Chevron states that current risk to human health does not exist as concluded in the December 1997 RBCA from your risk assessment group. In addition, the recent interpretations of bio-parameters concludes that intrinsic bio-remediation is occurring. Although this very well may be the case, our office has additional requests and comments, prior to our agreement to these conclusions.

In reference to the RBCA, County risk assessor, Ms. Madhulla Logan, has reviewed the report and I later spoke with Mr. Curt Peck of Chevron regarding her concerns. It appears that these items may not yet have been addressed in the form of a revised RBCA. I would like to recount Ms. Logans concerns:

- Please insure that the California slope factor for benzene is used in your calculations.
- It appears that you used the average benzene concentration from all wells (C-1 through C-9) and then compared it to the cleanup levels for a residential scenario. Only the concentrations from C-2, C-3, C-4 and C-5 should be averaged, since these are the wells close to residences. This applies to the exposure pathway, on-site residential exposure.
- The off-site wells should be averaged and compared separately for the off-site residential exposure pathway.
- Note if the RBSL is exceeded for on-site exposure pathways, a deed restriction or further site investigation will be required.
- In regards to the evaluation of soil data, in screen 7.3, it appears that two spoils samples, SP1A-D and SP2-A-D were included in the evaluation. Please recalculate the soil concentration without this data.
- Please insure that the average concentration is used in the GSI evaluation, not the geometric mean.

In regards to the charts of bio-parameter indicator versus BTEX concentrations, it appears that you have not graphed the two parameters indicative of aerobic bio-degradation, dissolved oxygen and oxidation-reduction potential. Please include these graphs in the future. In addition, it should be noted that the alkalinity by itself is not a definitive indicator parameter as it can be

Mr. Phil Briggs StID # 103 4265 Foothill Blvd., #9-0076 February 2, 1999 Page 2.

the result of subsurface soil dissolution. A more telling chart would be the concentration of BTEX and TPHg over time for the most impacted wells versus dissolved oxygen and ORP. I would also recommend looking at a statistical approach to verify plume stability when it is reached. Please indicate how the concentrations of the specific parameters used in the graphs were derived.

Please submit your revised RBCA and your response to my questions regarding the analysis for the bio-parameters to our office within 45 days or by March 16, 1999.

If you have any questions, please contact me at (510) 567-6765 or Ms. Logan at (510) 567-6764.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C: B. Chan, files

M. Logan, ACEH

Mr. S. Hooten, BP Oil Co., 295 SW 41st St., Renton, WA 98055-4931

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

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DAVID J. KEARS, Agency Director

May 6, 1998 StID # 103

Mr. Phil Briggs Chevron Products Co. 6001 Bollinger Canyon Rd., Bld. L San Ramon, CA 94583 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RO#427

Re: Chevron Service Station #9-0076, 4265 Foothill Blvd.,

Oakland CA 94601

Dear Mr. Briggs:

Our office has received and reviewed the first quarter groundwater monitoring report for the above site. One observation which was made was the continuing elevated TPHg, BTEX and MTBE concentrations in well C-2 and C-4. I also noticed that even though oxygen-releasing compounds were added to these wells and well C-6, only well C-6 had the elevated dissolved oxygen which would be expected with the addition of ORC. Therefore, please consider replenishing the ORC in wells C-2 and C-4. The high concentration of petroleum is likely consuming the dissolved oxygen faster than in well C-6.

In addition, the concentration of TPH, BTEX and MTBE also increased in well C-1. This may be the result of the increased groundwater elevation or may be a result of the recent detection of free product in MW-5 on the neighboring BP station. Groundwater gradient has not previously indicated BP as a potential direct up-gradient source, however, the most recent monitoring report for BP indicates this potential. You may want to also consider the addition of ORC into this well.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C: B. Chan, files

Mr. Alex Perez, Shell Oil Co., P.O. Box 8080, Martinez, CA 94553 Mr. Scott Hooton, BP Oil Co., 295 SW 41st St., Renton, WA 98055-4931

ORC4265

HEALTH CARE SERVICES

DAVID J. KEARS, Agency Director



RO# 427

January 2, 1998

Mr. Phil Briggs Chevron Products Co. 6001 Bollinger Canyon Rd., Bld. L Room 1110 P.O. Box 5004 San Ramon, CA 94583-0804

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

Re: Update on Chevron sites

Dear Mr. Briggs:

I recently wrote you about several Chevron or former Chevron sites which we previously discussed in our 8/21/97 meeting. This letter serves to update you on progress and needs of those sites where a specific letter has not been written.

StID # 607 , Former Signal Bulk Plant (RO#636) 2001 Versailles Ave. Alameda CA 94501

Our office has received and is currently reviewing the Risk Management Plan (RMP) for this site. Ms. Madhulla Logan, staff toxicologist, is discussing questions she has regarding the RMP with your consultant. As you may recall, groundwater monitoring should be put on hold. It is anticipated that after the approval and implementation of the approved RMP, the site will be recommended to the Water Board for closure. It appears that we are still missing the items mentioned in my September 15, 1997 letter, ie the monitoring well installation reports for all wells with the exception of the five wells installed on December 1984 and the one installed on May 1994. Please clarify the exact number and locations of all monitoring wells at this site.

StID # 838, Former Chevron Service Station, # 9-4340 (R0#1085) 2681 Fruitvale Ave. Oakland CA 94601

Our office has received a copy of RBCA/Closure Request from Cambria. This document is currently being reviewed by Ms. Logan. Upon completion of her review, it will be determined if a Risk Management Plan will be necessary. We have been notified that the title for monitoring well MW-13 has been transferred to the City of Oakland and remains part of their monitoring schedule. When the site has been approved for closure by our office and the RWQCB, it would be adviseable to resample those wells where ORC has been added to obtain the actual concentration of hydrocarbons left in-place. This information will be included in the transmittal letter for future notification purposes.

Mr. P. Briggs Update on Chevron sites January 2, 1998 Page 2.

StID # 4249, Former Chevron Station #9-4612 (Ro#233) 3616 San Leandro St. Oakland CA 94601

Our office has written a separate letter to you regarding this site.

StID # 541, Chevron Service Station # 9-1851 (Ro# 464) 451 Hegenberger Rd. Oakland CA 94621

Our office has written a separate letter to you regarding this site.

StID # 103, Chevron Service Station #9-0076 (R0#427) 4265 Foothill Blvd. Oakland CA 94601

Our office has received the RBCA for this site. I have recently provided this report to Ms. Logan along with a copy of Chevron/Shell's basement and well survey for this area for her review. We have also received the raw data for the soil samples taken from the recent piping and overspill protection upgrade at this site. We received the report of the installation of ORC in monitoring wells C-2, C-4 and C-6. At this point please continue to monitor the wells according to the existing schedule, ie quarterly for all wells except wells C-5, C-8 and C-9 which are sampled annually. After County review of the RBCA either additional remediation or a modified monitoring schedule may be appropriate.

As it has become more common to measure for bioremediation parameters, please have your consultant determine the need to establish a trend in the analysis of these results. Most analytical measurements should be routinely run during each monitoring event until a trend is illustrated. Your consultant should provide interpretation of the results. The addition of ORC to each impacted well should not be assumed to be the correct approach.

Please provide the requested information and provide a written comment to this letter within 30 days or by February 4. 1998.

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

Mr. P. Briggs Update on Chevron sites January 2, 1998 Page 3.

Sincerely,

Barney W Chan

Hazardous Materials Specialist

c: B. Chan, files

Mr. C. Mapes, 14 Grass Valley Ct., Oakland CA 94605 John & Molly King, King Petroleum, Inc., P.O. Box 137, Woodacre, CA 94973

Ms. M. Guensler, Exxon Co. USA, P.O. Box 4032, Concord, CA 94524-2032

Ms. G. Alie, 3032 Davis St., Oakland CA 94601

Ms. Linda M. and Laura A. Morn, c/o John Morn, 69 La Espiral Orinda, CA 94563

Ms. T. Arrowood, Cambria Env. Tech., Inc., 1144 65th St., Suite B, Oakland CA 94608

Mr. A. Perez, Shell Oil Co., P.O. Box 8080, Martinez, CA 94553

Ms. B. Russell, American Stores Properties, Inc., 348 E. South Temple St., Salt Lake City, UT 84111

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DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250 Alamada, CA 99502-6577 15101-567-6700 (510) 337-9385 (FAX)

September 17, 1997

ATTN: John P. Werfal

Gettler - Ryan Inc 2150 W Winton Ave Hayward CA 94545

RE: Project # 1572A - Type I

at 4265 Foothill Blvd in Oakland 94601

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$300.00, payable to Alameda County, Environmental Health Services.

We must receive this deposit so that future regulatory oversight on the subject site can procede in a timely fashion. At the completion of this project, any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following on the check to identify your account: - project #,

- type of project and

- site address (

(see RE: line above).

If you have any questions, please contact Pam Evans at (510) 567-6770.

Sincerely,

Ariu Levi Manager

Environmental Protection

c: files/inspector

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0#427

(4)

August 21, 1997

Mr. Phil Briggs Chevron Products Co. 6001 Bollinger Canyon Rd., Bld. L Room 1110 P.O. Box 5004 San Ramon, CA 94583-0804

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

Re: Summary of Meeting with Alameda County on August 21, 1997

Dear Mr. Briggs:

This letter serves to summarize the items discussed today in our meeting at the County's offices regarding the status of a number of Chevron or former Chevron sites. Please review my comments and respond to the following agreements or requests:

(RO#636) StID # 607 , Former Signal Bulk Plant 2001 Versailles Ave. Alameda CA 94501

This site has been adequately evaluated and monitored. Site closure will be initiated. Groundwater monitoring may be put on hold. You may wish to also put on hold the closure of all wells pending RWQCB closure concurrence. Be aware that well closure within the City of Oakland is now permitted through Alameda County Public Works. Their contact is Mr. Andreas Godfrey, (510) 670-5575. Because I will initiating the closure process, I may still need to request any additional information missing from our file.

Because residual soil contamination has been left in-place, a risk management plan must be implaced in the property's deed. This plan must include a health and safety plan to protect workers in the event of future construction or excavation activities. It should meet OSHA requirements. Alameda County must be notified and we must review the health and safety plan prior to future subsurface activities. A copy of the risk management plan should be sent to our offices for our files.

(R0#1085) StID # 838, Former Chevron Service Station, # 9-4340 2681 Fruitvale Ave. Oakland CA 94601

> At this time, groundwater monitoring may be put on hold pending the submission of your Human Health Risk Assessment (HHRA). Please evaluate residual soil and groundwater contamination based upon all future potential exposure pathways.

Mr. P. Briggs August 21, 1997 Chevron sites Page 2.

Keep in mind that the closure of wells at this time assumes some risk prior to RWQCB concurrence for site closure. Monitoring well MW-13 should not be closed as it is the City of Oakland's responsibility to continue monitoring this well as part of their on-going investigation of 2662 Fruitvale Ave. The introduction of ORC into MW-5 and MW-10 is acceptable as a means of enhancing bioremediation. You may also want to investigate other means of bioremediation enhancement. This includes the analysis of parameters indicative of natural attenuation ie dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and iron +2. Please provide your HHRA within 30 days or by September 23, 1997.

(RO#233) StID # 4249, Former Chevron Station #9-4612 3616 San Leandro St. Oakland CA 94601

This site is not adequately characterized. There is not any analytical data from the area around the three former USTs within the warehouse building. Please explore the possibility of collecting soil and groundwater samples in the area of the former fuel tanks. Additional characterization should attempt to delineate groundwater contamination downgradient of VH-1 and MW-2.

MTBE has been detected at this site as high as 530 ppb in MW-2. This result is inconsistent with a release from tanks which were removed in February 1976. Please continue to monitor this site quarterly for same current suite of chemicals. Please submit a work plan for further site characterization within 30 days or by September 23, 1997.

(R0#464) StID # 541, Chevron Service Station # 9-1851 451 Hegenberger Rd. Oakland CA 94621

This site has had a significant recent release as indicated by the MTBE levels. A work plan for the investigation of migration pathways and possible delineation of MTBE has been requested and should be provided to our office as soon as possible. Groundwater monitoring should continue at the site on a quarterly basis. Future groundwater monitoring analyses should meet the detection limits within the August 10, 1990, "Tri-Regional Board" Guidelines. Please insure your analytical laboratory meets these requirements. It appears that one possible source of the MTBE may be a dispenser leak. Please investigate this potential source.

Mr. P. Briggs Chevron sites August 21, 1997 Page 3.

(Ro#427) StID # 103, Chevron Service Station #9-0076 4265 Foothill Blvd. Oakland CA 94601

Chevron's request to reduce the monitoring of wells C-5,C-8 and C-9 to annually is approved. Please insure that this monitoring event occurs during the first quarter of each year. Our office was informed that a human health risk assessment will be prepared by CRCT by September 15, 1997. Please provide us a copy when received.

Your July 14, 1997 letter informed our office that product piping replacement and installation of overspill protection would occur at the site starting July 14. Please give a report of the observations and/or sampling results in your next monitoring report.

This site has the potential of a commingled plume along with the Shell Service station at 4411 Fruitvale Ave. Both Chevron and Shell were requested to perform a survey of the neighboring residents looking for domestic wells and basements. This was to be done by looking for permits and doing a physical site survey. Please provide a report of your findings.

Please consider the enhancement of bioremediation within significantly impacted wells; C2, C4 and C6 and please submit a copy of the monitoring well installation report for wells C-1 through C-4.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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c: B. Chan, files

T. Peacock, LOP Manager

Chev-mtg

AGENCY



DAVID J. KEARS, Agency Director

S+ID #/03 November 4, 1996

Mr. Philip Briggs Chevron Products Co. P.O. Box 5004 San Ramon, CA 94583-0804 Ro#427

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

Re: Request for Tier 2 Risk Assessment for 4265 Foothill Blvd. Oakland CA 94601

Dear Mr. Briggs:

Our office has received and reviewed the October 2, 1996 Off-site Monitoring Well Installation Report performed by Pacific Environmental Group. This report details the installation of a second monitoring well, C-9, in the parking lot of Lucky's Supermarket downgradient to the Chevron located at the above referenced address. It appears that the petroleum hydrocarbon plume has not migrated to this far as yet.

At this time our office requests that Chevron prepare a Tier 2 RBCA for this site. Based upon a conservative evaluation of the highest detected groundwater concentrations, this site exceeds the Tier 1 level for the Groundwater-Vapor Intrusion from Groundwater to Buildings exposure pathway for residential receptor at a one in ten thousand excess cancer risk for the chemical compound of benzene. Because residential homes exist next to this service station significant risk to human health may exist. Your risk assessment should also include the results of your survey of homes downgradient to this site to determine the presence of basements, water wells or other preferential pathways. It was previously agreed upon by both Shell and Chevron predecessors (Mr. Dan Kirk and Mr. Mark Miller) that this survey would be done downgradient to their respective service stations.

Please be aware that Mr. Jeff Granberry of Shell Oil has also been requested to prepare a similar RBCA risk assessment. Should you desire to exchange or combine information for consistency please do so.

Please submit a work plan for your Tier 2 RBCA evaluation within 45 days or by December 16, 1996.

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

Mr. Philip Briggs 4265 Foothill Blvd. StID # 103 November 4, 1996 Page 2.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: Mr. J. Granberry, Shell Oil Co., P.O. Box 4023, Concord CA 94524

Ms. Barbara Russell, American Stores Properties, Inc., 348
East South Temple St., Salt Lake City, UT 84111
RBCA4265

DAVID J. KEARS, Agency Director



R042子 RAFAT A. SHAHID, Director

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

July 12, 1995 StID # 103

Mr. Mark Miller Chevron USA Products Co. P. O. Box 5004 San Ramon, CA 94583-0804

Re: Work Plan Approval for Installation of Off-Site Well for 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Miller:

Thank you for the submission of July 3, 1995 work plan prepared by your consultant, Pacific Environmental Group, for the installation of the off-site monitoring well, C-9. Our office has reviewed the work plan and the well's location and they are acceptable. In order to expedite the well installation, you should proceed as soon as possible obtaining all required permits. Please contact me at least 48 hours prior to well installation so I may arrange to witness the field work if possible.

In another issue with this site, through conversation and voice message with you, we are aware that a qualitative risk assessment is being performed by your consultant group. Please inform us when we might receive a copy of this report.

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

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

cc: Mr. Steven Krcik, Pacific Environmental Group, 2025 Gateway
Place, Suite 440, San Jose, CA 95110
Mr. Dan Kirk, Shell Oil Co., P. O. Box 4023, Concord 94524
J. Makishima, files
well4265



DAVID J. KEARS, Agency Director

180415 - 4411 Foothill Blud.

(510) 567-6700

RAFAT A. SHAHID, DIRECTOR

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

May 19, 1995 StID # 103 and 113

Mr. Mark Miller Chevron USA Products Co. 6001 Bollinger Canyon Rd., Building L San Ramon, CA 94583-0804

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

Dear Sirs:

This letter serves to recount our May 17th meeting at the County's office where we discussed the subsurface investigations at both the Chevron site at 4265 Foothill Blvd. and the Shell station at 4411 Foothill Blvd. Without making any decisions regarding responsibility, we determined that additional investigation is necessary and that each of your respective companies would perform the following work:

Shell and Chevron: would continue to perform quarterly groundwater monitoring during the same time. Apparently, the groundwater sampler is now the same company and this arrangement may not be difficult. Should either of you feel the need to include the BP station station you are encouraged to contact Scott Hooten to attempt to co-ordinate their monitoring too.

Shell: Shell's work plan included in its April 25, 1995 report was approved in the County's April 28, 1995 letter. Recall, a Geoprobe study was proposed to verify the extent of soil and groundwater plus better determine the hydrogeological cross-section beneath and surrounding the Shell station. The specific location of GP-1 was proposed to be moved out to the edge of Bond St. given the access problem anticipated in the original location. In addition, another Geoprobe boring was requested by Chevron at the extreme southwest end of the proposed A-A' cross-section. This would help determine the extent of the gasoline plume.

Shell also volunteered to make a survey for any subsurface structures in the homes on the south side High St. downgradient to their station.

All reports were agreed to be shared with Chevron. It was anticipated that the Geoprobe investigation would occur sometime in August of 1995. Please keep our office informed of any delays from this schedule.

Mssrs. Miller and Kirk 4265 and 4411 Foothill Blvd. May 19, 1995 Page 2.

Chevron: At least one additional permanent monitoring well was to be installed downgradient to monitoring well C-7 in the Lucky parking lot. A work plan for this well will be submitted in June, however, its actual installation will be determined by the when an access agreement can be negotiated with Lucky. Should Chevron be limited to specific locations for a permanent well, temporary borings may be appropriate.

Chevron was to perform a Health Risk Evaluation using the concentration of contaminants being found in well C-4 and their effects on the residences next door. As an initial approach the Risk Based Screening Levels in the ASTM ES-38 document would be used for comparison. Chevron would be in contact with this office within two weeks to notify us of their actions.

Chevron was to perform or have perform a subsurface structure survey o the north side of High St. similar to Shell's.

Based on the results of the items mentioned, further work may be requested of either or both parties.

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

Sincerely,

Barney M. Chan

Barner M Cha

Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office

M. Cooke, Weiss Associates, 5500 Shellmound St., Emeryville, CA, 94608

Mr. R.Tinline, Pacific Environmental Group, Inc., 2025 Gateway Place, Suite 440, San Jose, CA 95110

B. Raynolds, files

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DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR
DEPARTMENT OF ENVIRONMENTAL HEALTH

R0427

March 14, 1995 StID # 103

Mr. Mark Miller
Chevron USA Products Co.
6001 Bollinger Canyon Rd., Building L
San Ramon CA 94583-0804

ENVIRONMENTAL PROTECT:
1131 HARBOR BAY PKWY.
ALAMEDA CA 94502-6577
(510)567-6700

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

Re: Status of Site Investigation at 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Miller:

The ongoing investigation at this operating Chevron station and that of the adjacent Shell station (4411 Foothill Blvd.) has provided interesting information which hopefully has clarified the sources of groundwater contamination coming from both sites. Our office has been patient in reviewing the groundwater gradient information and now requests that Chevron perform a Remedial Action Plan (RAP) inclusive of a feasibility study for the petroleum contamination on and offsite. Please provide your RAP to our office within 45 days or by April 28, 1995.

A joint meeting was proposed at one time with Mr. Dan Kirk of Shell, however, I'm not sure of the advantage of this type of meeting unless there will be some type of joint remedial approach performed by both parties. The extent of Chevron's groundwater plume must be determined and offsite contamination must be addressed. Currently, insufficient information exists to state that Chevron is being impacted by the Shell station's release.

I would like to make you aware that BP, which operates the other service station at 4280 Foothill Blvd. has been operating their groundwater extraction system since February of 1994. It appears that they are addressing their own petroleum release independently and need not get involved with either the Shell or Chevron sites.

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

Sincerely,

Barney M. Chan

Barney M Chan

Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office Mr. Mike Cooke, Weiss Associates, 5500 Shellmound St., Emeryville, CA 94608

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

G. Coleman, RAP4265

DAVID J. KEARS, Agency Director

R0427

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR DEPARTMENT OF ENVIRONMENTAL HEALTH

May 6, 1994

Mr. Mark Miller Chevron USA Products 2410 Camino Ramon San Ramon, CA 94583

Re: Chevron Station # 9-0076 4265 Foothill Blvd., Oakland 94601 StID # 103

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

Re: Shell Station
4411 Foothill Blvd., Oakland 94601
StID # 113

Mr. Scott Hooten
British Petroleum Oil Company
Environmental Resources Management
295 S. W. 41st St.
Building 13, Suite N
Renton, WA

Re: BP Station # 11109
4280 Foothill Blvd., Oakland 94601
StID # 102

Dear Sirs:

As part of your on-going investigation of petroleum fuel releases from your respective active underground storage tanks, each of you have been monitoring your wells for some time, some of you, much longer time than others. It has come to the concerned parties attention that a co-operative approach will be necessary to address the investigatin/remediation of these sites. It may prove more productive to look at these sites in a collective fashion and then investigate the most appropriate remedial approaches. The purpose of this letter is to come to some common decision as to what the short and long term outlook for these sites will be, ie when the data collection phase will conclude, when a joint feasibility study will be performed and what and when additional work must be done.

Division of Clean Water Programs UST Local Oversight Program 80 Swan Way, Rm 200 Oakland, CA 94621 (510) 271-4530

State Water Resources Control Board

Mssrs. Kirk, Miller and Hooten May 9, 1994 StID #s 102, 103, 113 Page 3.

Of course, each service station may choose to handle their site individually, but is appears that at least Chevron and Shell have been working together. I propose a meeting at the County's office with those parties interested in working jointly.

Please inform our office in writing within 30 days or by June 6, 1994 if you are willing to meet jointly to discuss the above concerns. Once the participants have been identified, I will solicit an agenda from each party and settle on an agreeable date for meeting(s).

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office

K. Graves, RWQCB

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E. Howell, files

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DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST, AGENCY DIRECTOR

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July 29, 1993 StID # 103

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

Mr. Mark Miller Chevron USA Products Company 2410 Camino Ramon San Ramon, CA 94583

Re: Comment on May 12, 1993 Quarterly Monitoring Report for Chevron Service Station 9-0076, 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Miller:

Our office has received and reviewed the above referenced report as prepared by Groundwater Technology. The results continue to indicate high levels of gasoline and BTEX concentration on and I look forward to proposals to address this contamination as mentioned in your June 17, 1993 letter. As you may be aware, the Shell site across from Chevron has completed the installation of wells. The gradient determined at this site is northwesterly ie towards the Chevron site, not southerly as found on the Chevron site. Because of this, the offsite contamination being found in wells C-6 and C-7 may be solely from the Chevron site.

It therefore appears that your remedial strategies should also include offsite contamination and further offsite investigation. I have copied you with my July 28, 1993 letter to Mr. Dan Kirk requesting co-operation between Chevron and Shell to facilitate the remedial investigation of both sites. In this letter, I have offered our office and the RWQCB as facilitators of a joint meeting if desired.

Please inform our office of your future intentions of meetings and remedial investigations for this site.

You may contact me at (510) 271-4530 if you have any questions.

sincerely, Barres W Che_

Barney M. Chan

Hazardous Material Specialist

cc: G. Jensen, Alameda County District Attorney Office

D. Kirk, Shell Oil Co., P.O. Box 5278, Concord CA 94520

E. Howell, files 3-4265FtHl

DAVID J. KEARS, Agency Director

R0427

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 5, 1993 StID# 103

Mr. Mark Miller Chevron USA Products Company P. O. Box 5004 San Ramon, CA 94583-0804 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

Re: Comment on April 29, 1993 Work Plan for Further Subsurface Investigation at 4265 Foothill Blvd., Oakland CA 94601, former Chevron Station #9-0076

Dear Mr. Miller:

Our office has received and reviewed the above referenced work plan for initiating in-situ bioremediation at this former Chevron site. The plan proposes to provide air injection into well C-2 and measure the bacteria count, nitrogen and phosphorous concentrations in the monitoring wells. This approach is not much more than "passive bioremediation" previously proposed for this site, which was consider inadequate. You are aware that such remediation is normally allowed when contamination has been confined to the limits of the property, which is not the case here.

Our office does recognize the potential of offsite migration of contamination from the Shell station across the street. There is merit in waiting until the gradient and hydrocarbon plume from this site has been defined. However, point 2 of my March 25, 1993 letter remains the County's concern ie the control of the migration of the petroleum hydrocarbon plume should be given the highest priority. With this in mind, our office would like some type of active remediation performed from well C-4 or beyond in addition to the in-situ bioremediation you propose for well C-2. This letter serves as conditional work plan approval as long as some type of active remediation is performed to prevent offsite contaminant migration. Please provide a remedial measure to accomplish containment to our office within 30 days of receipt of this letter.

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office

R. Hiett, RWQCB

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

E. Howell, files

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DAVID J. KEARS, Agency Director

R0427

(510) 271-4530

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 26, 1993 StID # 103 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

Mr. Mark Miller Chevron USA Products Company P.O. Box 5004 San Ramon, CA 94583-0804

Re: Status of Subsurface Investigation at 4265 Foothill Blvd., Oakland CA 94601, former Chevron Service Station #9-0076

Dear Mr. Miller:

After reviewing your March 3, 1993 groundwater monitoring and sampling report, our office has concerns whether the items previously discussed and detailed in letters were still being given priority and being acted upon. Your letter states that your consultant is preparing a work plan for enhanced in-situ bioremediation for the removal of dissolved hydrocarbons from well C-2. This is not consistent with what was outlined in your February 10, 1993 letter and what was discussed in our January 19, 1993 meeting.

Your February 10, 1993 letter contained the following observations and work plan proposals:

- 1. The groundwater being monitored on and off-site is apparently one continuous water bearing zone. Therefore, it may not be necessary to install on-site borings to a "deeper" aquifer depth.
- 2. The current groundwater extraction system was to be enhanced by including an extraction well located in the vicinity of well C-4.
- 3. In addition, recall in the January 19, 1993 meeting with you and Mr. John Randall, after investigating the Shell site, Chevron was going to install additional offsite wells on the Lucky Market site and perform groundwater recovery from these wells.
- 4. Chevron is still uncertain as to their liability for the groundwater contamination being found in monitoring wells, C-6 and C-7.

Mr. Mark Miller StID #103 4265 Foothill Blvd. March 25, 1993 Page 2.

Our office would like to clarify our opinion of what we would like to see occurring at this site.

- Monitoring well C-2, which is the well connected to the groundwater extraction system, should be continually extracted. Your quarterly reports should give the status of the amounts of water which has been extracted from this well during that quarter.
- Either C-4 or another well in its vicinity should be installed or enhanced to perform additional groundwater extraction. The control of the migration of the petroleum hydrocarbon plume should be given the highest priority.
- Groundwater contamination being found in well C-7 is potentially from the Shell station, however, is is just as likely that the contamination being found in well C-6 is originating from the Chevron site. Because you are required to delineate the extent of groundwater contamination emanating from the Chevron site, additional offsite monitoring well(s) are required plus a groundwater remediation plan.

Please provide a work plan for above items within 30 days and address the other preceding comments. Please update your progress on all proposed actions on all future quarterly monitoring reports.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

G. Jensen, Alameda County District Attorney Office cc:

R. Hiett, RWQCB

D. Kirk, Shell Oil Co., P.O. Box 4023, Concord CA 94524 E. Howell, files

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RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

December 1, 1992 STID # 103

DAVID J. KEARS, Agency Director

Mr. Mark Miller Chevron USA Products Co. P.O. Box 5004 San Ramon, CA 94583-0804 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

Re: Comment on November 16, 1992 Letter Regarding Subsurface Investigation at Chevron Service Station #9-0076, 4265 Foothill Blvd., Oakland CA 94601

Dear Mr. Miller:

I have received and reviewed your November 16, 1992 letter in response to my October 7, 1992 letter requesting further investigation at the above site. It is apparent that there are still points which need clarification. If you would like to meet with me after I summarize my concerns in this letter, you may contact me to set up an agreeable time and date. To a large extent, it appears that we both recognize the potential soil and groundwater contamination which is on and offsite. We do, however, have disagreements as to the identification of responsible parties and what will be done to remediate offsite contamination. In response to your letter I have the following concerns:

- 1. I am anticipating receiving an October 1992 groundwater sampling report. Upon review of the August 28, 1992 sampling report, it appears that TPHg and BTEX levels have not been reduced in monitoring well C-4 and in off-site wells, C-6 and C-7. You have stated that the extraction system in well C-2 has been running continously since May 92, but there has not been sufficient time to reflect the removal of dissolved hydrocarbons. What is the anticipated timeframe when you'd expect to see significant decrease in dissolved hydrocarbons and how do you explain this? Please provide the expected area of influence for the C-2 extraction well.
- 2. I understand that well C-4 cannot sustain an acceptable flow rate and therefore will not be used as an extraction well. How then do you intend to prevent the off-site migration of dissolved hydrocarbons without the use of this well as an extraction well?
- 3. Your letter states that it is unclear what responsibility, if any, Chevron has to the groundwater contamination currently being found in wells C-6 and C-7. You also state that BP is an upgradient source for this contamination. I find this hard to believe given the southwesterly gradient found on this site and the north-northwesterly gradient being found on the BP site.

Mr. Mark Miller STID # 103 4265 Foothill Blvd. December 1, 1992 Page 2.

There had been disagreement as to the source of the dissolved contamination in C-1, which is less than 100 feet from the BP site and is more downgradient than wells C-6 or C-7. Therefore, I do not believe that the BP site is responsible for the crossgradient contamination nearly 400 feet away. It is possible that the subsurface geology could account for a pathway from the BP Station towards wells C-6 and C-7, but this is unlikely since the same shallow groundwater zone is apparently being monitored at both sites.

4. To better understand the potential effects of offsite sources you will need to do more than data gathering. Groundwater elevation data will be needed from off and on-site wells to verify gradients to the east and south of your site. It may be beneficial to you to know that an offsite well near C-1 exists as part of BP's well network and that a well in the assumed downgradient direction to the former waste oil tank will be installed on the Shell site. Without evidence of gradient in these sites, Chevron is the responsible party for dissolved hydrocarbons in wells C-6 and C-7 and must provide a workplan to remediate this contamination.

Lastly, I would like to comment on Chevron's plans for further investigation.

- 1. Chevron proposes to review existing boring logs to determine if the two water bearing zones are connected. Clearly your consultants have indicated their interpretation of the connection of these areas by putting a series of question marks where these areas meet. Additional borings must be installed to determine if any connection exists between the shallow and deep aquifers.
- 2. Chevron proposes to explore the extent of soil contamination by drilling additional boring at the site. As mentioned in my October 7, 1992 letter, soil contamination has been identified in borings from C-A, C-2 and C-4. Additional borings are an acceptable means to determine the extent of this contamination.
- 3. Chevron proposes allowing the existing remediation system to operate for a period of time sufficient to evaluate its performance. This is acceptable if it can be shown that the operation of the system will have some affect in well C-4 and prevent migration of dissolved hydrocarbons from this site. Still, the contamination appearing in C-6 and C-7 will need to be remediated.

Mr. Mark Miller STID # 103 4265 Foothill Blvd. December 1, 1992 Page 3.

- 4. Chevron proposes to continue quarterly monitoring and sampling and determine changes in groundwater elevations and gradient directions. Along with this information, please include in all future quarterly monitoring reports: a. isoconcentration maps showing TPHg and Benzene concentrations b. all previous gradient and groundwater elevation data and c. all analytical results of previous samplings.
- 5. Chevron proposes to perform off-site investigations of the adjacent BP and Shell sites to determine what environmental work has been performed. This information is available at both our office and that of the RWQCB as required by the California Water Code Section 13267 (b). Some of this information has been previously provided to you in this and other letters from this office.
- 6. Lastly, a meeting can be arranged with Chevron and this office if there are items which still need to be clarified.

Please provide a written response to the above issues to our office within 30 days of receipt of this letter. You may contact me at (510) 271-4530 should you have any questions.

Sincerely,

Barney M. Chan

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Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office

R. Hiett, RWQCB

S. Hooton, B. P. Oil, Env. Resources Mgmt., 16400 Southcenter Parkway, Suite 301, Tukwila, WA 98188

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

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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

October 7, 1992 STID # 103

Mr. Mark Miller Chevron USA Products Co. P.O. Box 5004 San Ramon, CA 94583-0804

Re: Request for Work Plan Addendum for Chevron Service Station #9-0076, 4265 Foothill Boulevard, Oakland CA 94621

Dear Mr. Miller:

Thank you for the submittal of your recent, September 16, 1992 groundwater monitoring report. Please be advised that the oversight of the remediation of this site has been transferred to the Local Oversight Program (LOP) section of Alameda County Environmental Health, Hazardous Materials Division. The new case worker is the undersigned specialist.

Upon review of the files, it appears that significant groundwater and potential soil contamination still exists at this site. Offsite contamination as evidenced by groundwater concentrations in monitoring wells C-6 and C-7 also exists. The offsite contamination will need to be remediated and at this time no information exists to identify another responsible party other than Chevron.

I would like to address the assessment and remediation onsite Free product and high dissolved gasoline and BTEX has been known to exist since 1989. Your groundwater extraction system was started up in November of 1991. My observation is that to date, this system has not been successful in reducing levels of dissolved gasoline and BTEX constituents. High levels of these contaminants still exist in monitoring wells C-2, C-4, C-6 and C-7 at levels still as high as when the wells were initially installed. From our records, the pump test data was used to estimate groundwater recharge rates but did not provide any information in regards to estimating the expected capture zone of the extraction system. In fact, our office has no information in regards to an actual pump test having been performed. In addition, as was stated in a Weiss Associates report, well C-4 would not be expected to be able to sustain an acceptable flow rate for an extraction system. Therefore, it appears that an alternative or additional remediation method will be needed to reduce the contaminant levels. The 7/14/92 levels of 40,000 ppb TPHg and 14,000 ppb benzene found in well C-4 certainly require immediate remediation.

R0427

Mr. Mark Miller STID 103 October 7, 1992 4265 Foothill Blvd. Page 2.

It also appears that the groundwater contamination has migrated offsite. The southwesterly gradient is likely causing groundwater contamination in the direction of wells, C-6 and C-7. You must consider remediation from these wells until there has been agreement from our office or that of the Regional Board, that this contamination is from another source. As was noted in previous reports, there is a Shell station located potentially upgradient to these wells. Please be advised that the Unauthorized Release at this site was from a waste oil underground tank with fairly low levels of oil and grease contamination detected.

It is noted that well C-1, the upgradient onsite well, has recently detected significantly higher TPHg and BTEX levels and this location is potentially downgradient to the British Petroleum station at 4280 Foothill Blvd. Be aware that groundwater gradient on the BP site is complex and that well C-1 is potentially crossgradient to the BP site. Your concern that the high concentrations in C-1 are from offsite is noted and will be communicated to BP in our next correspondence. Given the area that may be affected by this contamination, it may be prudent to consider extending or adding this well to the existing remediation system in order to control the contamination's migration, while concurrently investigating the offsite source potential.

Additionally, the extent of soil contamination at this site has not been determined. Potential soils may still exist onsite which may continue to contribute to the groundwater contamination. Soil borings from C-A, C-2 and C-4 indicate high TPHg in the 8.5-10 feet depth range. Our office will require the determination of the extent of soil and groundwater contamination.

The offsite wells, C-6 through C-8 were installed in August of 1990 into a deeper aquifer. With the high concentrations of gasoline and BTEX in C-6 and C-7, it is necessary to determine the connection of the shallow aquifer onsite with that of the deep offsite aquifer. One method to do this would be to drill an exploratory well with a double casing, onsite, to determine if the deep aquifer exists and to sample groudwater if it does. This action should be given a priority and will be required even if another responsible party is identified. Once the connection of the two aquifers is determined a work plan will be required to control and remediate the offsite contamination in addition to that found onsite.

Mr. Mark Miller STID # 103 4265 Foothill Blvd. October 7, 1992 Page 3.

Please include in future quarterly monitoring reports a summary of the amounts of hydrocarbons removed during that quarter and a total amount since the initiation of the extraction system.

Please submit a workplan addendum to augment the existing system onsite, within 45 days of receipt of this letter. You should also give a time schedule for the determination of the connection of the shallow and deep aquifers found on and offsite.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested documents may subject you to civil liabilities. You may contact me at (510) 271-4530 should you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office

R. Hiett, RWQCB E. Howell, files

WP-4265FtHill

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

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

February 21, 1992

Mr. Mike Vomund Chevron USA, Inc. P.O. Box 5004 San Ramon, CA 94583-0804

SUBJECT: FIVE YEAR UNDERGROUND STORAGE TANK OPERATING PERMIT 4265 Foothill Blvd., Oakland, CA 94601

Dear Mr. Vomund:

Please find enclosed a five year underground storage tank permit to operate three double walled tanks with double walled pressure piping at the subject facility. To operate under a valid permit, you are required to comply with the conditions as described in the revised Title 23, California Code of Regulations (CCR) adopted effective August 9, 1991. The conditions are summarized below:

- The owner or operator shall comply with the reporting and recording requirements for unauthorized releases, specified in Article 5.
- 2) Written records of all monitoring and maintenance performed shall be maintained for a period of at least three (3) years. These records must be made available, upon request within 36 hours, to a representative of this office.
- an operating permit may be transferred to a new underground storage tank owner if all of the following are met: the new owner does not change any conditions of the permit; the transfer is registered with this office within 30 days of the change in ownership; and the tank permit application forms are completed to show the changes. Upon receiving the ownership transfer request this office may review, modify, or terminate the permit to operate the underground storage tank(s).

4265 Foothill Blvd., Oakland February 21, 1992 Page 2 of 3

Title 23, specifies that non-visual monitoring/quantitative release detection be performed. The following methods may be utilized:

- a) DOUBLE WALLED UNDERGROUND STORAGE TANKS, Section 2643 (c) (2) (A&B);
 - annual tank integrity test, AND
 - monthly inventory reconciliation
- b) PRESSURIZED PIPING, Section 2643(d);
 - hourly automatic line leak detector, AND
 - annual line tightness test

You may utilize other release detection methods for tanks and piping as outlined in Appendix IV of Title 23, CCR. Enclosed is a copy of Appendix IV for your reference. You are required to send written notification to this office regarding any changes in the current monitoring methods.

Inventory reconciliation is an integral part of the non-visual monitoring/quantitative release detection method. The following summary is taken from Title 23, Section 2646.

- a) The daily variation in inventory reconciliation shall be the difference between the physically measured inventory in storage and the calculated inventory in storage. Daily variations shall be summed for a period of one month. Monthly variations exceeding a variation of 1% of the monthly tank delivery plus 130 gallons must be investigated in accordance with this section. Please find enclosed a sample worksheet to perform inventory reconciliation.
- b) You are required to submit on an ANNUAL basis, a statement to this office which states that all inventory reconciliation data are within allowable variations or, submit a list of the days and corresponding variations which exceeded the allowable variations. Said statement shall be executed under penalty of perjury.

Please note that after January 1, 1993, inventory reconciliation, and any other leak detection method that utilizes manual stick readings, shall NOT be used as part of non-visual monitoring for

4265 Foothill Blvd., Oakland February 21, 1992 Page 3 of 3

existing underground storage tanks, where the ground water level or the highest anticipated ground water level is less than 20 feet below the bottom of the tank. If this applies to tanks you operate then you are required to then select another release detection method(s) for tanks and piping as out-lined in Appendix TV.

Consult the revised Title 23, CCR for additional requirements. To obtain a copy of the amended regulations, you may contact the State Water Resources Control Board at (916) 322-3132.

Should you have any questions or concerns regarding the contents of this letter, please contact Robert Weston at (510) 271-4320.

Sincerely,

Dennis Byrne Dennis Byrne

Senior Hazardous Materials Specialist

DB:RW:rw

c: Loi Van Le Files

enclosures



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

August 12, 1991

Mr. Loi Le 4265 Foothill Blvd. Oakland, CA 94601

Re: Chevron #90076, 4265 Foothill Blvd., Oakland

Dear Mr. Le,

On August 7, 1991, Cathy Gates from this office inspected the above premises with regard to issuance of a 5-year permit to operate three underground storage tanks (UST's). Our records indicate that the above facility is operating without any Underground Storage Tank Permits. In order to comply with California Hazardous Material and UST laws, and attain valid UST permits, you must comply with the following:

- 1) Section 2710(b). 2711, Title 23, CCR Submit an updated Tank Application Form "A" to reflect ownership change by September 1, 1991. This form was provided to manager Michael Tran during the inspection.
- 2) Section 25504, CH&S Submit a Hazardous Material Management Plan (HMMP) by September 1, 1991. Enclosed is a form to use to prepare the plan. Please also note that Chevron may have a copy of the previous owner's plan, which you may modify. Also send verification that your Hazardous Materials Management Plan is available on-site, and that your employees are familiar with how to respond in an emergency.
- 3) Section 2632(d)(1), 2634(d)(2), Title 23, CCR Submit a written routine monitoring plan that is also available on-site by September 1, 1991. This plan must describe each monitoring method that is used at this station. Be sure to include verification that the Ronan electronic leak detection system has probes for both the tanks AND the pipelines. Also provide verification that this system is calibrated every six months as specified by the manufacturer.

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Mr. Loi Le August 12, 1990 Page 2 of 2

A 5-year permit will be issued when the above items are received. Please submit all of the required materials in the time frame specified. Failure to respond in a timely manner could result in civil liabilities under the Health and Safety Code.

Should you have any questions regarding this letter, please feel free to contact Cathy Gates at (415) 271-4320.

Sincerely,

Cynthia Chapman, HMS

Hazardous Materials Division

Cynthia Chapman

cc: Gil Jensen, Alameda County District Attorney, Consumer and Environmental Protection Division Mike Vomund, Chevron U.S.A. files

enclosure CC:CG:cg mem21

R0427

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

August 1, 1991

Ms. Nancy Vukelich Chevron, USA, Inc. PO Box 5004 San Ramon, CA 94583-0804

4265

Re: Chevron Service Station 9-0076, 4625 Foothill Boulevard, Oakland

Dear Ms. Vukelich:

As I stated in my letter of July, 15, I went through our files on this site to list the reports/documents that we have. They are:

BlaineTech Sampling reports, June 1987

May 24, 1989: Weiss Associates groundwater sampling report for sampling event April 28, 1989

September 13, 1989: Weiss Associates groundwater sampling report for sampling event August 8, 1989

Subsurface Investigation at Chevron Service Station #9-0076, 4265 Foothill Boulevard, prepared by Weiss Associates, December 1990

June 13, 1991, Groundwater Remediation Workplan

July 18, 1991, Groundwater Monitoring Report, prepared by Weiss Associates

The Subsurface Investigation report references a Pacific Environmental Group's report, dated September 23, 1987, that was prepared for Gettler Ryan. Apparently this report contains the information for the original borings and wells, and mentions that well C-2 had two feet of floating product. We do not have this report in our file.

It also seems that there is an information gap in the files regarding the pump tests mentioned in the 1991 groundwater remediation workplan. Pumping rates were supplied in this report without any qualifying data, or a summary of activities, or reasons for making this determination. Please bear in mind that in order for our agency and the RWQCB to adequately assess the

Ms. Nancy Vukelich Re: 4265 Foothill August 1, 1991 Page 2

success of the system and the remediation, Chevron will need to supply us with this background information.

At your earliest convenience, please send us copies of these and any other "missing" reports. If you have any questions, feel free to call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Hazardous Materials Specialist

Cynthia Chapman

c: Eddie So, RWQCB



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

July 15, 1991

Ms. Nancy Vukelich Chevron, U.S.A. Inc. P.O. Box 5004 San Ramon, CA 94583-0804

4265

Re: Chevron Service Station #9-0076, 4625 Foothill Boulevard, Oakland

Dear Ms. Vukelich:

I've reviewed the Weiss Associates June 13, 1991, ground water remediation proposal. My notes from the February 14, 1991, Regional Board meeting state that there has been offsite migration of the contamination, and this is confirmed in the proposal. It is if the extraction system will in the proposal clear offsite migration of existing contain/prevent any further Preventing offsite migration of the hydrocarbon contamination. plume is a priority with both this agency and the Regional Board. Since I don't have the pump test information, I will accept the proposed extraction system with the condition that Chevron address how offsite migration will be contained.

Our files on this site are painfully brief. The Weiss Associates report references reports that are not in the file. I will be sending you a list of reports that we do have, so that you can send us copies of the remaining reports.

As I stated in my phone message to you today, we will need to open a deposit/refund account for this site to cover our oversight costs. Please remit \$670.00, payable to Alameda County, to our address.

If you have any questions, please call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Hazardous Materials Specialist

Lynthia Chapman

c: Rich Hiett, RWQCB