

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
8-24-06

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

August 24, 2006

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

Subject: Fuel Leak Case No. RO0000173, Shell#13-5675, 2120 Montana Avenue, 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, "Remediation System Expansion and Off-Site Investigation Status Report," dated August 17, 2006. The report, which was prepared on Shell's behalf by Cambria Environmental Technology, Inc., describes the expansion and operation of the groundwater extraction system (GWE). We concur with the continued operation of the GWE system. Please present GWE system data with the quarterly groundwater monitoring reports requested below.

We request that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- 100 days following Execution of Access Agreement – Results of Additional Soil Vapor Investigation
- August 30, 2006 - Quarterly Monitoring Report for the Second Quarter 2006
- November 30, 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).

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.

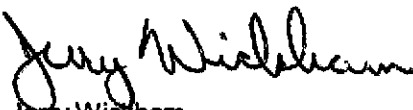
Denis Brown
August 24, 2006
Page 3

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
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ENVIRONMENTAL HEALTH SERVICES
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FAX (510) 337-9335

June 23, 2006

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

Subject: Fuel Leak Case No. RO0000173, Shell#13-5675, 2120 Montana Avenue, 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 documents entitled, "Groundwater Extraction Well Installation Report," dated June 12, 2006, and "First Quarter 2006 Groundwater Monitoring Report," dated May 30, 2006. Both reports were prepared on Shell's behalf by Cambria Environmental Technology, Inc. The "Groundwater Extraction Well Installation Report," describes the installation of two groundwater extraction wells in the southwestern portion of the site. The "First Quarter 2006 Groundwater Monitoring Report," presents the results of quarterly groundwater sampling conducted on March 3, 2006.

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

TECHNICAL COMMENTS

1. **Extraction Wells.** Please present the results of the expansion of the groundwater extraction system to include additional groundwater extraction wells EW-1 and EW-2 in the "Results of Additional Soil Vapor Investigation and Expansion of Groundwater Extraction System," report requested below.
2. **Access Agreement for Soil Vapor Sampling.** Soil vapor sampling, as proposed in a work plan dated January 23, 2006, is to be conducted off-site at 2110 Montana Street, subject to the completion of an access agreement with the adjacent property owner. Please present the results of the soil vapor sampling in the "Results of Additional Soil Vapor Investigation and Expansion of Groundwater Extraction System," report requested below.
3. **Resampling of Wells.** As discussed in the Groundwater Extraction Well Installation Report," groundwater samples may have been labeled incorrectly during the March 2, 2006 sampling event. Please present the results of the May 10, 2006 sampling of the monitoring wells and discuss your conclusions regarding the March 2, 2006 analytical results in the Quarterly Monitoring Report for the Second Quarter 2006 requested below. Please footnote the March 2, 2006 results on future analytical data tables accordingly.

TECHNICAL REPORT REQUEST

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

- **August 15, 2006** – Results of Additional Soil Vapor Investigation and Expansion of Groundwater Extraction System
- **August 30, 2006** - Quarterly Monitoring Report for the Second Quarter 2006

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

ELECTRONIC SUBMITTAL OF REPORTS

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PERJURY STATEMENT

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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UNDERGROUND STORAGE TANK CLEANUP FUND

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AGENCY OVERSIGHT

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

Sincerely,


Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cynthia Vasko
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 2005
	REVISION DATE: May 31, 2006
	PREVIOUS REVISIONS: October 31, 2005, December 16, 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: **ftp Site Coordinator**.
 - 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



SENT 2-06-06

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

February 3, 2006

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

Subject: Fuel Leak Case No. RO0000173, Shell#13-5675, 2120 Montana Avenue, 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 document entitled, "Remedial Action and Additional Site Investigation Work Plan," dated January 23, 2006, prepared on Shell's behalf by Cambria Environmental Technology, Inc. The Work Plan proposes the installation and sampling of four off-site vapor probes and the expansion of the groundwater extraction system to include two additional wells. ACEH concurs with the proposed scope of work.

Please perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **May 31, 2006** - Quarterly Monitoring Report for the First Quarter 2006
- **June 15, 2006** - Results of Additional Soil Vapor Investigation and Expansion of Groundwater Extraction System

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

ELECTRONIC SUBMITTAL OF REPORTS

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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UNDERGROUND STORAGE TANK CLEANUP FUND

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

Denis Brown
February 3, 2006
Page 3

AGENCY OVERSIGHT

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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: Cynthia Vasko
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 11-14-05

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

November 10, 2005

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

Subject: Fuel Leak Case No. RO0000173, Shell#13-5675, 2120 Montana Avenue, 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 Vapor Sampling Report," dated October 24, 2005, prepared on Shell's behalf by Cambria Environmental Technology, Inc. The report presents the results of recent investigation activities at the site that included four soil borings using cone penetrometer testing (CPT) and ultraviolet induced fluorescence (UVIF) and installation and sampling of two soil vapor probes. The report also includes the results of a door-to-door survey conducted in August 2005.

ACEH concurs with the conclusions and recommendations in the report regarding the expansion of the groundwater extraction system and additional soil vapor investigation. Please submit a Work Plan(s) by **January 26, 2006** to implement these recommendations. Please address the following technical comments, perform the proposed work and send us the reports described below.

TECHNICAL COMMENTS

1. **Adjacent Property.** The report text (Door to Door Survey) describes the property west of and adjacent to the site as 2110 Montana Street. The base map for the site shows the address for the adjacent property as 2116 Montana Street. Please clarify whether 2110 Montana Street is directly adjacent to the site by revising the base map in the Work Plan(s) requested below and future reports to show the approximate location and address of the building on the immediately adjacent property to the west of the site.

TECHNICAL REPORT REQUEST

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

- **January 26, 2006** – Work Plan(s) for Expansion of Groundwater Extraction System and Additional Soil Vapor Investigation

- February 28, 2006 - Quarterly Report for the Fourth Quarter 2005

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

ELECTRONIC SUBMITTAL OF REPORTS

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PERJURY STATEMENT

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PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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UNDERGROUND STORAGE TANK CLEANUP FUND


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

AGENCY OVERSIGHT

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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June 10, 2005

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

Subject: Fuel Leak Case No. RO0000173, Shell#13-5675, 2120 Montana Avenue, Oakland, CA –
Revised Figure 3 Proposed Soil Boring Locations

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the revised proposed soil boring locations on Figure 3. Revised Figure 3 was presented to ACEH staff during a meeting between Shell, Cambria, and ACEH conducted on June 8, 2005. Figure 3 was originally presented in the report entitled, "Interim Remediation Report," dated January 18, 2005, prepared by Cambria. ACEH staff previously presented technical comments on the report in correspondence dated May 16, 2005. Based on staff review of the revised Figure 3 and discussions during the June 8, 2005 meeting between Shell, Cambria, and ACEH, we have the following technical comments. Please perform the proposed work and send us the reports described below. Please provide 72-hour advance notification to ACEH prior to initiating field sampling activities.

TECHNICAL COMMENTS

1. **Relocation of Proposed Soil Vapor Sampling Points.** Due to the presence of utilities beneath the originally proposed locations, the soil vapor sampling points have been relocated to the east as shown on revised Figure 3. The proposed locations on revised Figure 3 are acceptable.
2. **Soil Borings.** The May 16, 2005 correspondence from ACEH requested that the field investigation be continued to the extent necessary to fully define the extent of SPH prior to demobilization. Due to restricted access along the western portion of the site, it may not be possible to complete additional borings for delineation of SPH prior to demobilization from the site. Therefore, the results of the proposed investigation will be evaluated to assess whether additional borings will be necessary to define the extent of SPH.

TECHNICAL REPORT REQUEST

The schedule for submittal of technical reports is unchanged from the May 16, 2005 ACEH correspondence. Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **July 15, 2005** - Quarterly Report for the Second Quarter 2005

- **September 15, 2005** – Site Assessment Report
- **October 17, 2005** - Quarterly Report for the Third Quarter 2005
- **January 17, 2006** - Quarterly Report for the Fourth Quarter 2005

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

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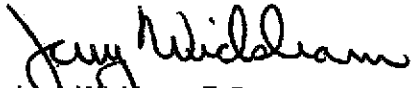
AGENCY OVERSIGHT

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Mr. Denis Brown
June 10, 2005
Page 3

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
5-17-05

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

May 16, 2005

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

Dear Mr. Brown:

Subject: Fuel Leak Case No. RO0000173, Shell#13-5675, 2120 Montana Avenue, Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Interim Remediation Report," dated January 18, 2005, prepared by Cambria. The report summarizes results from soil vapor extraction (SVE) conducted from July 26 through July 29, 2004, at 2120 Montana Avenue in Oakland, CA. The Interim Remediation Report also includes recommendations for soil vapor sampling and further assessment of the lateral extent of separate phase hydrocarbons (SPH). Based on staff review of the document referenced above, we request that you address the following technical comments, perform the proposed work, and send us the reports described below. The technical comments are to be addressed prior to conducting the work and documentation is to be provided in the site assessment report requested below. Please provide 72-hour advance notification to ACEH prior to initiating field sampling activities.

TECHNICAL COMMENTS

1. **Drawdown In Monitoring Wells during SVE.** The report indicates that Cambria periodically monitored the depth to groundwater in all wells throughout the period of SVE and that drawdown was observed in all wells. The depths to water during the period of SVE are not tabulated in the report. Please tabulate the depths to water measured in each well during the periods of SVE and the estimated rate of groundwater extraction during these periods. Please present this tabulation in the site assessment report requested below.
2. **Soil Vapor Sampling.** We concur with the proposed plan for soil vapor sampling. Please include the results of the investigation in the report requested below.
3. **Soil Borings.** We concur with the proposed plan to use cone penetrometer test (CPT) borings drilled to a depth of 25 feet below grade at the five locations proposed. However, the investigation is to be continued to the extent necessary to fully define the extent of SPH. Therefore, we request that additional CPT borings be drilled to fully define the extent of SPH if interpretation of the CPT data by the qualified geologist or engineer for the project indicates that the full extent of SPH has not been defined by data from the five proposed locations. Expedited site assessment techniques that analyze the field data as it is collected, and modify the sampling and analysis program as needed to fill data gaps and resolve anomalies prior to demobilization, are a scientifically valid and cost-effective approach to fully define the three-dimensional extent of contamination. Technical protocol for expedited site

assessments are provided in the U.S. Environmental Protection Agency's (EPA) "Expedited Site Assessment Tools for Underground Storage Tank Sites: A Guide for Regulators" (EPA 510-B-97-001), dated March 1997.

4. **Soil and Groundwater Sampling.** The criteria for selecting depths for soil and groundwater sampling are not discussed in detail in the work tasks for the proposed investigation. ACEH requests that soil samples be collected immediately above the water table in each boring and at depths where UVIF readings indicate that petroleum hydrocarbons are present in the soil. As noted in the work tasks for the proposed investigation, the laboratory analytical results will be compared to the UVIF readings. Depth-discrete groundwater samples are to be collected from coarse-grained layers in the subsurface and depths below the water table where UVIF readings are elevated. Results are to be presented in the Site Assessment Report requested below.

TECHNICAL REPORT REQUEST

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

- **July 15, 2005** - Quarterly Report for the Second Quarter 2005
- **September 15, 2005** – Site Assessment Report
- **October 17, 2005** - Quarterly Report for the Third Quarter 2005
- **January 17, 2006** - Quarterly Report for the Fourth Quarter 2005

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

PERJURY STATEMENT

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

Mr. Denis Brown
May 16, 2005
Page 3

present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

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

Donna Drogos, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



9-25-02

R013

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

STID 4022

September 19, 2002

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I have received and reviewed "Subsurface Investigation, Soil Vapor Extraction Pilot Test Report, and Interim Remediation Work Plan", dated September 4, 2002, regarding the above referenced site submitted by Ms. Jacquelyn L. Jones of Cambria Environmental.

I have discussed the above document with Ms. Jones, Cambria Environmental as well. Per this document and my discussions with Ms. Jones, Cambria is recommending installment of GWE system, which will remove constituent in the plume via carbon absorption and hydraulically control plume migration.

Additionally Cambria recommend installment of underground SVE piping to be utilized if and when future data warrants it.

Per my discussion with Ms. Jones I concur with the proposals made within this document. However, modification to the GWE system and or full installment and operation of SVE system might be deemed necessary upon receipt of future data gathered from the operation of the above system.

Please design and submit the drawings for GWE/SVE system to this office as discussed.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



05-29-02

20173

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

Stid 4022

May 23, 2002

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I am in receipt of the faxed copy of the proposed workplan regarding the above referenced site dated March 25, 2002 submitted by Ms. Jacquelyn L. Jones of Cambria Environmental. Thank you for submittal of the workplan. Per this document and my discussion with Ms. Jones, Cambria Environmental is proposing to install two monitoring wells, on and one off-site, at the above referenced site in order to define the existing plume. Additionally a five-day SVE Pilot test will be performed to assess the viability of such technique as a remedial alternative. TBW-S backfill well will be used for the test since it is located in the most downgradient of the three dry tank backfill wells and is the deepest well as well. Additionally, MW-1 well will be used as the monitoring point during the test.

I concur with the above approach proposed by Cambria Environmental. However, the location of the proposed MW-5 should be moved closer to the source area per my discussion with Ms. Jones.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



03-28-02

20173

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

March 18, 2002

STID 4022

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

This office is in receipt of "Fourth Quarter 2001 Monitoring Report" dated February 26, 2002, submitted by Ms. Jacquelyn L. Jones of Cambria Environmental Technology, Inc. regarding the above referenced site. I would like to make the following comments regarding this document:

- Per this document, periodical extraction from monitoring well MW-1 and tank backfill well TBW-N has been stopped due to absence of separate phase hydrocarbons (SPH).
- GWE has so far removed 5.34 and 3.67 pounds of total petroleum hydrocarbon as gasoline and MTBE respectively. Additionally manual bailing and GWE have removed 2.68 pounds of SPH.
- Groundwater flow gradient is southwest through northwest at 0.02 ft/ft while depth to groundwater was from 10.13 to 11.51ft bgs.
- The highest concentration of constituents were found within BTW-N at 76,000ppb, 1,600ppb, and 30,000ppb of TPPH, Benzene, and MTBE
- I concur with the work proposed by Ms. Jacquelyn L. Jones, Cambria Environmental regarding onsite and offsite plume delineation as well as Soil Vapor Extraction test in order to determine the most appropriate remediation technique.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in cursive script that reads "Amir K. Gholami".

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-19-01

20173

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

December 18, 2001

STID 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I am in receipt of "Third Quarter 2001 Monitoring Report" dated November 30, 2001 as well as Remediation Summary document, submitted by Ms. Jacquelyn L. Jones of Cambria Environmental Technology, Inc. regarding the above referenced site.

I would like to make the following comments concerning each document indicated above:

Regarding the Remediation Summary:

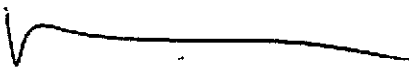
- According to this report, weekly groundwater extraction started in August 2001 from MW-1 and TBW-N using a Vacuum truck to transfer the pumped groundwater to an approved facility
- An estimated total mass of 1.70 and 1.69 pounds of TPHg and MTBE respectively has been removed so far.
- About 2.68 pounds of SPH have been removed at the site.
- I understand that the frequency of mobile GWE may alter depending on the need, presence, and or absence of SPH in the wells.

Regarding the Third Quarter 2001 Monitoring Report:

- MW-1 well was not analyzed due to presence of SPH. However, MW-2, and TBW-N wells both indicated high concentrations of contaminants as well. MW-2 well revealed up to 41ppb and 6,400ppb of Benzene and MTBE respectively. TBW-N well revealed up to 3,200ppb and 31,000ppb of Benzene and MTBE respectively. MW-3 well did not reveal any concentration of contaminants (<0.050).
- Per figure 2 within this report groundwater flow indicates a westerly flow at 0.02 ft/ft.

If you have any questions and or concerns, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami', with a long horizontal stroke extending to the right.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-18-01

20173

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

December 17, 2001

STID 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I have received the document dated 12/17/01 regarding the above referenced site. This document was submitted to clarify my previous correspondence dated November 29, 2001 concerning missing information regarding Interim Remedial Activity (IRA), which was to be performed to mitigate the recently noticed separate phase hydrocarbon at the above referenced site.

Per this document and our conversation today weekly Mobile Ground Water Extraction from MW-1 well as well as four existing tank backfill wells are used to remove and transfer groundwater to a proper disposal facility. I understand that the back fill wells are slotted well with no sand pack such as those used in usual monitoring wells.

The groundwater is in a westerly direction, historically from Southwest to Northwest, at 0.02 ft/ft per figure 2 within Third Quarter Monitoring Report.

As discussed today, I have not received the "Sensitive Receptor Survey" document yet. Please forward a copy of this document to this office.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-4-01
20173

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

November 29, 2001

STID 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

This office is in receipt of faxed copy of document dated September 11, 2001 faxed October 25, 2001, submitted by Ms. Jacquelyn L. Jones of Cambria Environmental Technology, Inc. regarding the above referenced site. This document was submitted due to the request made by this office in a correspondence dated August 30, 2001. This was to address missing information regarding Interim Remedial Activity (IRA), which was to be performed to mitigate the recently noticed separate phase hydrocarbon at the above referenced site.

As you are aware, a "weekly Mobile Ground Water Extraction" from MW-1 well as well as some tank backfill wells will be used and the removed groundwater will be taken to a proper disposal facility. However, I am unclear regarding which of the backfill wells will be used during this process. You can provide further information after the initial groundwater extraction work.

Additionally, please perform groundwater gradient calculations along with sensitive survey and preferential pathway studies per my request previously.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-5-01

20113

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

November 2, 2001

STID 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I am in receipt of "Sensitive receptor Survey and Conduit Study Report" dated September 24, 2001, submitted by Ms. Jacquelyn L. Jones of Cambria Environmental Technology, Inc. regarding the above referenced site. Thank you for submittal of this report. I have also discussed the case with Ms. Jones and would like to make the following comments:

1. Per my discussion with Ms. Jones, I find the above report acceptable .
2. I understand that "weekly Mobile Ground Water Extraction" from wells using a Vacuum truck and removing the groundwater extract to a proper disposal facility has caused elimination of Separate Hydrocarbon from MW-1
3. Per my request to Ms. Jones, I understand that the extraction will be performed using MW-1 well and a tank backfill well, which has not been identified on the plot plan at the present time. You may use this approach and determine its effectiveness periodically to ensure proper method for removal of SPH is being performed.
4. Please submit a plot plan to include all available wells per my discussion with Ms. Jones.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



8-31-01

20173

August 30, 2001

STID 4022

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

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I have been recently informed that you have not received my previous letter, which was sent to your consultant. Please accept my apology for the error. In my previous correspondence I pointed out the following comments regarding "Agency Response" document submitted by Ms. Jacquelyn L. Jones of Cambria Environmental Technology, Inc. regarding the above referenced site.

1. I had formerly requested that some form of Interim Remedial Activity (IRA) be performed in order to mitigate the recently noticed separate phase hydrocarbon at the above referenced site. Cambria Environmental, your consulting firm, is suggesting a "weekly Mobile Ground Water Extraction" from wells using a Vacuum truck and removing the groundwater extract to a proper disposal facility. I understand that the extraction will be performed using MW-1 well and a tank backfill well, which has not been identified on the plot plan at the present time. You may use this approach and determine its effectiveness periodically to ensure proper method for removal of SPH is being performed.
2. Please submit a plot plan to include all available wells per my discussion with Ms. Jones. I understand that you will be performing groundwater gradient calculations along with sensitive survey and preferential pathway studies per my request previously.

Additionally, please be advised that I have discussed the above issues with Ms. Jones of Cambria Environmental as well.

Should you have any questions and or concerns, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



8-22-01

20173

August 21, 2001

STID 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I am in receipt of faxed copy of "Agency Response" document dated August 15, 2001 submitted by Ms. Jacquelyn L. Jones of Cambria Environmental Technology, Inc. regarding the above referenced site. I have reviewed the above document and have discussed the case with Ms. Jones of Cambria Environmental as well.

This office requested some form of Interim Remedial Activity (IRA) be performed in order to mitigate the recently noticed separate phase hydrocarbon at the above referenced site. Cambria Environmental, your consulting firm, is suggesting a "weekly Mobile Ground Water Extraction" from wells using a Vacuum truck and removing the groundwater extract to a proper disposal facility. I understand that the extraction will be performed using MW-1 well and a tank backfill well, which has not been identified on the plot plan at the present time. You may use this approach and determine its effectiveness periodically to ensure proper method for removal of SPH is being performed.

Please include a plot plan to include all available wells per my discussion with Ms. Jones. I understand that you will be performing groundwater gradient calculations along with sensitive survey and preferential pathway studies per my request previously.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



08-15-01

RO173

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

August 14, 2001

STID 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

This office is in receipt of "Second Quarter 2001 Monitoring Report" dated July 23, 2001 submitted by Ms. Jacquelyn L. Jones of Cambria Environmental Technology, Inc. regarding the above referenced site. Please consider the following comments:

- Per this report the analytical results for MW-1 and MW-3 were not consistent with the previous analysis. On June 27th visit there was 0.15 and 0.31 feet of Separate Phase Hydrocarbon (SPH) detected within MW-1 well on two separate visits. The MW-1 well is situated down gradient of the plume. Please submit a workplan as Interim Remedial Action (IRA) to address the Separate Phase Hydrocarbon.
- MW-1 well was not analyzed due to presence of SPH. However, MW-2 and MW-3 both indicated high concentrations of contaminants as well. MW-2 well revealed up to 610ppb and 47,000ppb of Benzene and MTBE respectively. MW-3 well revealed up to <.50ppp and <.50ppb of Benzene and MTBE respectively in contrast to 1,000ppb and 54,000ppb of Benzene and MTBE respectively during the last analysis.
- Per figure 1 within this report groundwater flow indicates a westerly flow. Please calculate the slope of groundwater flow and submit it with the next report.
- As indicated previously quarterly monitoring, sensitive receptor survey, and preferential pathway investigation must be performed. Additionally an adequate form of active remediation must take place due to the fact that there is high degree of contaminants present at the site. Please submit a workplan to address the above within 30 days.

Should you have any questions, please call me at (510) 567-6876.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Jacquelyn L. Jones, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-25-01

PO173

July 23, 2001

STID 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

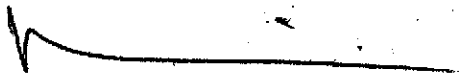
Dear Ms. Petryna:

I am in receipt of "Groundwater Monitoring Well Installation Report" dated May 22, 2001 submitted by Mr. James Loetterle of Cambria Environmental Technology, Inc. regarding the above referenced site. I would like to make the following comments regarding this report:

- I am fully aware of the fact that RMP is required, for instance, during and when an excavation is taking place and to prevent any potential worker exposure to the residual contaminants left at the site.
- Per this report there has been high degree of contaminants found at both soil and groundwater including Benzene and MTBE of up to 0.0666 ppm and 5.2 ppm respectively in soil and as high as 753ppb and 27,500ppb in groundwater at the above referenced site. There were other contaminants present as reported by laboratory analysis as well.
- The MW-1 well is the immediate down gradient well with the highest concentrations of the contaminants followed by MW-2 well. MW-3 well, the most upgradient well, contained minute amount of contaminants.
- Groundwater flow indicates a southwesterly flow. However, the slope of groundwater was not calculated. Please calculate and submit it with the next report.
- I concur with quarterly monitoring as well as sensitive receptor survey. However, a preferential pathway investigation as well as some sort of active remediation must take place due to the fact that there is high degree of contaminants present at the site. Please submit a plan of action regarding the above within 30 days or by August 23rd, 2001.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, consisting of a stylized initial 'A' followed by a long horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. James Loetterle, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-37-00

Ro#173

Stid 4022

October 27, 2000

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

This office is in receipt of the proposed workplan regarding the above referenced site dated June 7 2000 submitted by Mr. Darryk Ataide, Cambria Environmental. Thank you for submittal of the workplan. Per this report the soil boring SB-2-10 revealed up to 0.27ppm of MTBE and SB-2-15 revealed 0.019ppm of Benzene. These soil borings represented the highest concentrations of MTBE and Benzene. Groundwater sample of SB-3-W revealed 3,210ppb of MTBE and SB-2-W ground water sample indicated 10.6ppb of Benzene. These groundwater samples represented the highest concentrations of MTBE and Benzene. The groundwater flow gradient is estimated to be southwesterly.

I concur with the Mr. Ataide's proposal made in the workplan. However, Please ensure proper development of monitoring wells including screening levels to extend 5 feet above and 15 feet below groundwater level.

I understand that items 1 through 4 of my previous correspondence will be addressed properly.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



*SENT 6/5/2000
incl cc's*

20173

June 2, 2000

Stid 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I just discussed the above referenced site with Mr. Darryk Ataide of Cambria Environmental. In our discussion he requested an extension of submittal of some documents, which I had previously asked for in my letter dated May 1, 2000. The extension for the submittal of the documents is granted. **Please submit and or address all the required items within 14 days by June 16th, 2000:**

1. A copy of the site plan that reveals where the borings will be placed revealing the newly proposed location for soil sample SB-2.
2. The test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC will be performed.
3. A "Risk Management Plan, RMP", will be completed and submitted upon completion of site investigation. The RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place.
4. Pending the results of the investigation, more investigation including soil/groundwater samplings, etc. may be necessary.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 5-4-2000
Inheld co

20173

May 1, 2000

Stid 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I sent a letter to you earlier regarding the above referenced site. I informed you regarding a missing site plan, which was supposed to be attached with your latest proposed workplan. In his letter, Mr. Ataide refers to a site plan, which I actually never received. Please send a copy of the site plan that reveals where the borings will be placed.

Additionally, I requested that you respond to the issues raised in my letter dated October 6th, 1999 within two weeks. I have not yet received any document from you addressing the pending issues. I would like to remind you of your legal obligation to comply with these issues.

I would like to remind you of the following issues:

1. Mr. Ataide, is proposing a revised location for soil sample SB-2. However, the copy of the site plan revealing the newly proposed location needs to be faxed in.
2. The test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC will be performed.
3. A "Risk Management Plan, RMP", will be completed and submitted upon completion of site investigation. The RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place.
4. Pending the results of the investigation, more investigation including soil/groundwater samplings, etc. may be necessary.

Please address the above issues by June 1, 2000.

Should you have any questions and or concerns, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to be 'Amir K. Gholami', written over a horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 5-4-2000
mald dals

20173

May 1, 2000

Stid 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I sent a letter to you earlier regarding the above referenced site. I informed you regarding a missing site plan, which was supposed to be attached with your latest proposed workplan. In his letter, Mr. Ataide refers to a site plan, which I actually never received. Please send a copy of the site plan that reveals where the borings will be placed.

Additionally, I requested that you respond to the issues raised in my letter dated October 6th, 1999 within two weeks. I have not yet received any document from you addressing the pending issues. I would like to remind you of your legal obligation to comply with these issues.

I would like to remind you of the following issues:

1. Mr. Ataide, is proposing a revised location for soil sample SB-2. However, the copy of the site plan revealing the newly proposed location needs to be faxed in.
2. The test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC will be performed.
3. A "Risk Management Plan, RMP", will be completed and submitted upon completion of site investigation. The RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place.
4. Pending the results of the investigation, more investigation including soil/groundwater samplings, etc. may be necessary.

Please address the above issues by June 1, 2000.

Should you have any questions and or concerns, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to be 'Amir K. Gholami', written over a horizontal line.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 10-8-99

20173

October 6, 1999

Stid 4022

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I am in receipt of the fax copy of the letter dated September 22, 1999 by your consultant, Mr. Darryk Ataide of Cambria Environmental in response to my comments made earlier regarding the proposed workplan at the above referenced site. In his letter, Mr. Ataide refers to a site plan, which I actually never received. Please send a copy of the site plan that reveals where the borings will be placed


I would like to remind you of the following issues:

- I understand that Mr. Ataide, is proposing a revised location for soil sample SB-2. However, the copy of the site plan revealing the newly proposed location needs to be faxed in.
- I understand that the test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC will be performed.
- Per our previous discussion, a "Risk Management Plan, RMP", will be completed and submitted upon completion of site investigation. The RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place.
- Pending the results of the investigation, more investigation including soil/groundwater samplings, etc. may be necessary.

Please address the above issues by October 19th, 1999.

If you have any questions and or concerns, please call me at (510) 567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 9-10-99
(1) DARRYK ATAIDE
(2) K. PETRYNA
(3) AMIR

R0173

Stid 4022

September 8, 1999

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I had a discussion regarding the "Investigation Work Plan Addendum" dated May 27th, 1999 with your consultant, Mr. Darryk Ataide of Cambria Environmental. As indicated previously, the overall amendment to the plan is acceptable. **However, please ensure that the following items are addressed:**

- Per my discussion with Mr. Ataide, on figure 1 of the proposed plan: take soil sample SB-2 further west to the assumed downgradient location.
- Test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC.
- Per our previous discussion, a "Risk Management Plan, RMP", will be completed and submitted upon completion of site investigation. The RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place.
- Pending the results of the investigation, more investigation including soil/groundwater samplings, etc. may be necessary.

Please address the above issues by September 22nd, 1999. This is a formal request for technical information and hence any delays should be requested in writing.

Please call me at (510) 567-6876, if you have any questions.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0173

Stid 4022

July 30, 1999

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

ENVIRONMENTAL HEALTH SERVICES

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

I am in receipt of a copy of "Investigation Work Plan Addendum" dated May 27th, 1999 submitted by Mr. Darryk Ataide of Cambria Environmental. The overall amendment to the plan is acceptable. **However, please inform me how the decision regarding the sampling locations were made and resubmit Figure 1 revealing the area where the contaminants were found.**

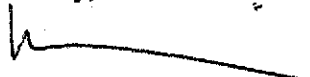
I understand that the test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC will be performed.

Additionally, a "Risk Management Plan, RMP", will be completed and submitted upon completion of site investigation. The RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place

Please address the above issues by August 12th, 1999. This is a formal request for technical information and hence any delays should be requested in writing.

You may call me at (510) 567-6876, should you have any questions.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

R0173

Stid 4022

July 28, 1999

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

ENVIRONMENTAL HEALTH SERVICES

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear MS. Petryna:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 2120 Montana Ave., Oakland

July 28, 1999

Page 2 of 2

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

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6876 if you have any questions about the content of this letter.

Sincerely,



Amir K. Gholami, REHS
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to Alameda County.

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R073

Stid 4022

July 13, 1999

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

ENVIRONMENTAL HEALTH SERVICES

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

At the request of Mr. Darryk Ataide of Cambria Environmental, this office extended the submittal of a required workplan to May 28th, 1999. This workplan is to address to several issues, which were indicated in my letter dated May 4th, 1999. However, to this date no workplan has been submitted to this office as it had been agreed on.


Please address the following issues in the revised workplan:

- The investigation of the surrounding properties to evaluate groundwater flow gradient prior to determination of the actual sample locations. As you are aware, the limited number of samples must be placed correctly in order to reveal the actual subsurface condition. You may contact this office regarding the available data regarding the surrounding properties.
- Testing for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- A Risk Management Plan, RMP, will be completed and submitted upon completion of site investigation. The RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place

Please submit the revised work plan by July 27th, 1999. This is a formal request for technical information and hence any delays should be requested in writing.

You may call me at (510) 567-6876, should you have any questions.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0173

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

Stid 4022

May 4, 1999

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

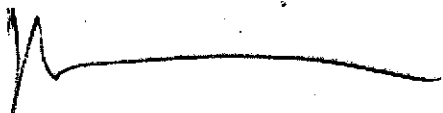
As you are aware, I sent you a letter dated April 21, 1999 regarding the Investigation Work Plan dated April 16, 1999 submitted by Mr. Darryk Ataide of Cambria Environmental Technology, Inc. There were some issues, which were to be addressed prior to implementation of the plan by May 7, 1999. However, Mr. Darryk Ataide of Cambria Environmental Technology, Inc. contacted this office and requested an extension for addressing the issues to be postponed to May 28, 1999. The request for an extension is acceptable. However, the following are to be addressed:

- The need to investigate the surrounding properties to evaluate groundwater flow gradient prior to determination of the actual sample locations. As you are aware, the limited number of samples must be placed correctly in order to reveal the actual subsurface condition. You may contact this office regarding the available data regarding the surrounding properties.
- The need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- As mentioned previously, I understand that a RMP will be completed and submitted upon completion of site investigation. As indicated previously, the RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place

Please submit a work plan regarding the above concerns by May 28, 1999. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'M' followed by a long horizontal line that tapers to the right.

**Amir K. Gholami, REHS
Hazardous Materials Specialist**

**C: Mr. Darryk Ataide, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
Files**

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO # 173

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

Stid 4022

April 21, 1999

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

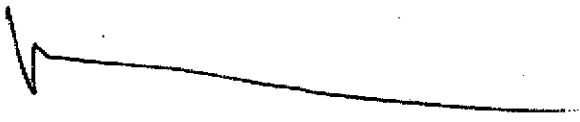
I am in receipt of the Investigation Work Plan dated April 16, 1999 submitted by Mr. Darryk Ataide of Cambria Environmental Technology, Inc. The submitted work plan is acceptable. However the following issues should be addressed prior to commencement of the actual work:

- You need to investigate the surrounding properties to evaluate groundwater flow gradient prior to determination of the actual sample locations. As you are aware, the limited number of samples must be placed correctly in order to reveal the actual subsurface condition. You may contact this office regarding the available data regarding the surrounding properties.
- Additionally, according to Cal /EPA and Regional Water Quality Control Board (RWQCB) guidelines, you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.
- I understand that a RMP will be completed and submitted upon completion of site investigation. As indicated previously, the RMP is requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place

Please submit a work plan within 14 days from the date of this letter or by May 7, 1999. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, consisting of a vertical line on the left, a small hook at the top, and a long horizontal line extending to the right.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Diane Lundquist, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 173

Stid 4022

March 22, 1999

Ms. Karen Petryna
Equilon Enterprises LLC
PO Box 6249
Carlson, CA 90749

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

RE: Former Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Ms. Petryna:

Ms. Diane Lundquist of Cambria Environmental informed me that the newly merged Shell and Texaco are now operating under Equilon Enterprises LLC. She also informed me of the reason for the delay regarding the requests made previously by this office. As you are aware, I had sent a letter dated February 10, 1999 to Mr. Perez of Shell Oil Company and discussed several items, which were to be addressed in 30 days or by March 10, 1999. Among the issues discussed were the request for few grab ground water samples and a Risk Management Plan (RMP). The grab groundwater samples were requested to reveal the condition present at the above site with laboratory analysis looking for TPH (G), TPH (D), BTEX, and MTBE. The RMP was requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place.

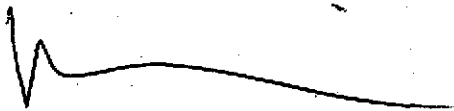
To this date, this office has not received any response regarding the made request from Mr. Perez.

Please submit a work plan within 30 days from the date of this letter or by April 17, 1999. This is a formal request for technical information and hence any delays should be requested in writing.

Furthermore, Ms. Lundquist of Cambria Environmental requested that I send a copy of our "Notice of Requirement to Reimburse" letter which had been issued to Shell Oil company on 1/7/94. Attached please find a copy of this letter for your review.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amir K. Gholami'. The signature starts with a vertical line, followed by a small peak, then a long horizontal line that tapers slightly to the right.

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: Ms. Diane Lundquist, Cambria Environmental, 1144 - 65th Street, Oakland, CA 94608
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#173

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

Stid 4022

March 16, 1999

Mr. Perez
Shell Oil Company
PO Box 8080
Martinez, CA 94553

RE: Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Mr. Perez:

I sent you a letter dated February 10, 1999 and discussed several items, which were to be addressed in 30 days or by March 10, 1999. Among the issues discussed were the request for few grab ground water samples and a Risk Management Plan (RMP). The grab groundwater samples were requested to reveal the condition present at the above site with laboratory analysis looking for TPH (G), TPH (D), BTEX, and MTBE. The RMP was requested to address the risk posed during any earth-moving activities, foundation and utility trenching, water impoundment, etc. and to specifically address the risk to the construction workers (health and safety) with site development map showing areas where contaminants are left in place.

To this date, this office has not received any response from you.

Please submit a work plan within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, please do not hesitate to call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS
Hazardous Materials Specialist

C: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 173

Stid 4022

February 10, 1999

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

ENVIRONMENTAL HEALTH SERVICES

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

RE: Shell Station located at 2120 Montana Ave., Oakland, CA 94602

Dear Mr. Perez:

This office has assigned me to review the above referenced site. Having reviewed and discussed this case with other staff members, we concluded that there are several issues at hand at the present time. **Please address the following:**

1. A couple of grab ground water samples must be taken to reveal the groundwater condition present at the above site. State certified lab analysis should look for the following constituents: TPH(G), TPH(D), BTEX, and MTBE
2. Provide a Risk Management Plan (RMP), to address the risk posed during any earth moving activities, foundation and utility trenching, water impoundments, etc. and specifically address the risk to the construction workers (health and safety). The RMP should also include a site development map showing areas where contaminants are left in place.

Please submit a work plan within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, please call me at (510) 567-6876.

Sincerely,


Amir K. Gholami, REHS
Hazardous Materials Specialist

C: files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0173

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

March 27, 1990

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

Attn: Lisa Foster & Ken Lottinger

RE: Underground storage tank permit requirements
Mr. Bhushan Bansall 2120 Montana Street, Oakland 94603

Dear Ms. Foster:

This letter is in regards to the inspection which was done at your facility on January 31, 1990 by Paul Smith of our department. The inspection was performed to evaluate whether the conditions for the 5 year underground storage permit were being met. The 5 year permit will be issued upon receipt of the following in accordance with Title 23 of the California Code of Regulations:

Section 2641 requires that you maintain daily inventory records at the tank facility. Records for only this past year were available upon inspection. Obtain the previous 2 years worth of records and keep them at the tank facility.

Upon inspection of your records, daily inventory swings appeared to be over the allowable limits. If the inventory swings exceed the allowable amount according to Section 2641(5)(b) the operator is required to investigate the reason for these swings and to notify all responsible parties if applicable; [Sect 2644(e&f)].

It is noted that on June 27th, 1989 all tanks at your facility passed the annual precision test. Please explain the reason, in writing, for the large inventory swings which you reported in your quarterly monitoring report and explain how greater accuracy can be attained in the future.

R0173

Shell Oil Company
March 21, 1990
Page 2 of 2

Please respond within 10 days of the receipt of this letter.
If you have any questions please direct them to Paul Smith with our
department at 271-4320.

Sincerely,



Edgar B. Howell III, Acting Chief,
Hazardous Materials Division

EBH:PMS:pms

Enclosures (2)

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Ken Lottinger, Shell Area Manager
Bhushan Bansal Dealer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0173

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

March 27, 1990

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

Attn: Lisa Foster & Ken Lottinger

RE: Underground storage tank permit requirements
Mr. Bhushan Bansall 2120 Montana Street, Oakland 94603

Dear Ms. Foster:

This letter is in regards to the inspection which was done at your facility on January 31, 1990 by Paul Smith of our department. The inspection was performed to evaluate whether the conditions for the 5 year underground storage permit were being met. The 5 year permit will be issued upon receipt of the following in accordance with Title 23 of the California Code of Regulations:

Section 2641 requires that you maintain daily inventory records at the tank facility. Records for only this past year were available upon inspection. Obtain the previous 2 years worth of records and keep them at the tank facility.

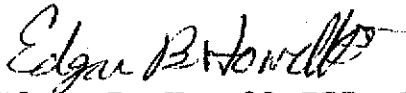
Upon inspection of your records, daily inventory swings appeared to be over the allowable limits. If the inventory swings exceed the allowable amount according to Section 2641(5)(b) the operator is required to investigate the reason for these swings and to notify all responsible parties if applicable; [Sect 2644(e&f)].

It is noted that on June 27th, 1989 all tanks at your facility passed the annual precision test. Please explain the reason, in writing, for the large inventory swings which you reported in your quarterly monitoring report and explain how greater accuracy can be attained in the future.

Shell Oil Company
March 27, 1990
Page 2 of 2

Please respond within 10 days of the receipt of this letter.
If you have any questions please direct them to Paul Smith with our
department at 271-4320.

Sincerely,



Edgar B. Howell III, Acting Chief,
Hazardous Materials Division

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