ALAMEDA COUNTY HEALTH CARE SERVICES



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

January 11, 2007

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

Subject: Fuel Leak Case No. RO0000223 and Geotracker Global ID T0600102123, Shell, 540 Hegenberger Road, Oakland, CA 94621

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent report entitled, "Groundwater Monitoring Report – Third Quarter 2006," dated November 20, 2006. The report presents the results of quarterly groundwater monitoring conducted in August 2006. Groundwater extraction (GWE) was conducted on either an interim or continuous basis at the site from July 1999 until November 8, 2005. Mobile dual-phase vacuum extraction was also performed at the site from July 1999 to June 2000. The fixed groundwater extraction system was shut down on November 8, 2005 due to low concentrations of dissolved fuel hydrocarbon and oxygenates in the GWE system influent. Groundwater monitoring has been conducted on a quarterly basis at the site since August 1998.

The "Groundwater Monitoring Report – Third Quarter 2006," concluded that, "no significant rebound of contaminants has been observed in four post-remediation sample events." On January 4, 2007, Shell Oil Products requested concurrence that operation of the groundwater extraction system was not required due to declining dissolved phase concentrations. We concur that the trend in dissolved phase concentrations of fuel hydrocarbons and oxygenates have not changed significantly since the GWE system was shutdown on November 8, 2005. Therefore, continued active remediation by groundwater extraction is not required for the site.

Based on the stable trend observed in contaminant concentrations, a reduction in the frequency of sampling may be appropriate. Please present recommendations regarding sampling frequency in the groundwater monitoring report requested below.

TECHNICAL REPORT REQUEST

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

February 28, 2007 – Groundwater 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

Denis Brown January 11, 2007 Page 2

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

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.

Denis Brown January 11, 2007 Page 3

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,

Jerry Wickham

Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Ana Friel
Cambria Environmental Technology, Inc.
19449 Riverside Drive, Suite 230

Sonoma, CA 95476

Sunil Ramdass SWRCB Cleanup Fund 1001 I Street, 17th floor Sacramento, CA 95814-2828

Donna Drogos, ACEH Jerry Wickham, ACEH File

Wickham, Jerry, Env. Health

To:

Friel, Ana

Cc:

denis.l.brown@shell.com

Subject: RE: 540 Hegenberger Rd, Oakland (RO 0223) Request Agency Concurrence to Decommission

Remediation System

Ana and Denis,

Based on the trend in groundwater concentrations during the time period from shut down of the groundwater extraction system until the most recent groundwater monitoring event in the third quarter of 2006, active remediation by groundwater extraction is not required at the site. Future operation of the system would not be anticipated unless there was another fuel release or there was a significant increase in fuel hydrocarbon concentrations in groundwater that indicated changed conditions. I plan to send a letter with this same conclusion.

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

From: Friel, Ana [mailto:afriel@cambria-env.com] Sent: Thursday, January 04, 2007 11:16 AM

To: Wickham, Jerry, Env. Health Cc: denis.l.brown@shell.com

Subject: 540 Hegenberger Rd, Oakland (RO 0223) Request Agency Concurrence to Decommission Remediation

System

Importance: High

Jerry,

In our November 2006 3Q06 QMR document we wrote: "Since the shut down of the groundwater extraction system at this site in November 2005, no significant rebound of contaminants has been observed in four postremediation sample events."

At this time, we would like to terminate Shell's discharge permit with EBMUD, since we believe that operation of the system will not be needed in the future. Prior to notifying EBMUD of the permit termination, Shell would like concurrence from your agency that operation of the remediation system is not needed currently, nor anticipated in the future. The system effectively reduced the elevated MTBE concentrations at this site, and residual concentrations are declining and do not warrant active remediation.

Please respond at your earliest convenience, as termination of the EBMUD discharge permit will reduce unnecessary expenses required by the permit. Once we receive your concurrence and confirmation of permit termination by EBMUD, we will coordinate the decommissioning of the system.

Please contact me if you have any questions. Regards.

Ana Friel, PG Associate Geologist



Wickham, Jerry, Env. Health

Vasko, Cynthia [cvasko@cambria-env.com] From:

Friday, November 04, 2005 2:27 PM Sent:

To: Mena, Deirdre; dmcmulle@ebmud.com

Wickham, Jerry, Env. Health; Brown, Denis L SOPUS-OP-COR-H Cc:

Subject: 540 Hegenberger, Oakland - GWE System Shutdown - 11/10/05

Deirdre,

On behalf of Shell, I am sending this e-mail to notify you that the GWE System located at 540 Hegenberger, Oakland (EBMUD Permit # 50517531) will be shut down during out next site visit, currently scheduled for November 10, 2005, in order to assess rebound. Please pass this information on to all interested parties at EBMUD. You will be notified if we decide to restart the system. Do not hesitate to contact me at 510-420-3344 or Treysa Jackson at 510-420-3341 if you have any questions.

Regards,

Cynthia Vasko Project Engineer Cambria Environmental Technology, Inc. 5900 Hollis Street, Suite A Emeryville, CA 94608 phone: (510) 420-3344

fax: (510) 420-9170 cell: (510) 385-0137

Wickham, Jerry, Env. Health

From:

Vasko, Cynthia [cvasko@cambria-env.com]

Sent:

Wednesday, July 27, 2005 4:51 PM

To:

Wickham, Jerry, Env. Health

Cc:

Brown, Denis L SOPUS-OP-COR-H; Derby, Matt; Jackson, Treysa

Subject: FW: 540 Hegenberger Road, Oalkand - GWE System Shutdown

Mr. Wickham,

FYI, Cambria is scheduled to restart the GWE system located at 540 Hegenberger, Oakland, pumping from well MW-3 only, on Friday July 29, 2005. This decision is in response to an increase in MTBE concentrations during the second quarter 2005 monitoring event compared to the previous two quarters. The analytical data will be included in our next quarterly monitoring report. In the meantime, feel free to contact me if you have any questions.

Regards,

Cynthia Vasko

Project Engineer

Cambria Environmental Technology, Inc.

5900 Hollis Street, Suite A, Emeryville, CA 94608

phone: 510-420-3344

fax:

510-420-9170

cell:

510-385-0137 (change)

----Original Message----

From: Vasko, Cynthia [mailto:cvasko@cambria-env.com]

Sent: Monday, April 18, 2005 10:13 AM

To: Roseanna E. Garcia-LaGrille

Cc: Brown, Denis L SOPUS-OP-COR-H; Derby, Matt; Lescure, Daniel Subject: 540 Hegenberger Road, Oalkand - GWE System Shutdown

Ms. Garcia-LaGrille,

FYI, the groundwater extraction system at 540 Hegenberger Road, Oakland was intentionally shut down on 3/2/05 to assess rebound. This information was reported in our Fourth Quarter 2004 Monitoring Report, dated April 8, 2005. Cambria will continue to notify you of future changes to the operational status of the GWE system at this site. Please contact me at 510-420-3344 if you have any questions or require additional information.

Regards,

Cynthia Vasko

Project Engineer

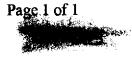
Cambria Environmental Technology, Inc.

5900 Hollis Street, Suite A, Emeryville, CA 94608

phone: 510-420-3344 510-420-9170 fax:







Garcia-La Grille, Roseanna, Env. Health

From: Vasko, Cynthia [cvasko@cambria-env.com]

Sent: Monday, April 18, 2005 10:13 AM

To: Garcia-La Grille, Roseanna, Env. Health

Cc: 'Brown, Denis L SOPUS-OP-COR-H'; 'Derby, Matt'; 'Lescure, Dan'

Subject: 540 Hegenberger Road, Oalkand - GWE System Shutdown

Ms. Garcia-LaGrille,

FYI, the groundwater extraction system at 540 Hegenberger Road, Oakland was intentionally shut down on 3/2/05 to assess rebound. This information was reported in our Fourth Quarter 2004 Monitoring Report, dated April 8, 2005. Cambria will continue to notify you of future changes to the operational status of the GWE system at this site. Please contact me at 510-420-3344 if you have any questions or require additional information.

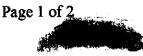
Regards,

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

phone: 510-420-3344 fax: 510-420-9170







Garcia-La Grille, Roseanna, Env. Health

From: Vasko, Cynthia [cvasko@cambria-env.com]

Sent: Monday, April 18, 2005 10:51 AM

To: 'Brown, Denis L SOPUS-OP-COR-H'; Garcia-La Grille, Roseanna, Env. Health

Cc: 'Derby, Matt'; 'Lescure, Dan'

Subject: RE: 540 Hegenberger Road, Oakland - GWE System Shutdown

No problem. I agree that we should err on the side of over-notification; if they don't want to hear about what we're doing at the site, they can say so, but we don't anyone to say later that we didn't keep them informed.

Cynthia Vasko

Project Engineer

Cambria Environmental Technology, Inc.

5900 Hollis Street, Suite A, Emeryville, CA 94608

phone: 510-420-3344 fax: 510-420-9170

----Original Message----

From: Brown, Denis L SOPUS-OP-COR-H [mailto:denis.l.brown@shell.com]

Sent: Monday, April 18, 2005 10:14 AM

To: Vasko, Cynthia; Roseanna E. Garcia-LaGrille

Cc: Derby, Matt; Lescure, Dan

Subject: RE: 540 Hegenberger Road, Oakland - GWE System Shutdown

Thanks

Thanks,

Denis

Denis L. Brown

Sr. Environmental Engineer

Shell Oil Products US

HSE - Environmental Services

20945 S. Wilmington Ave.

Carson, CA 90810-1039

Bus. 707-865-0251

Fax. 707-865-2542

Cell 707-290-9101

denis.l.brown@shell.com

----Original Message----

From: Vasko, Cynthia [mailto:cvasko@cambria-env.com]

Sent: Monday, April 18, 2005 10:13 AM

To: Roseanna E. Garcia-LaGrille

Cc: Brown, Denis L SOPUS-OP-COR-H; 'Derby, Matt'; 'Lescure, Dan' Subject: 540 Hegenberger Road, Oalkand - GWE System Shutdown





FYI, the groundwater extraction system at 540 Hegenberger Road, Oakland was intentionally shut down on 3/2/05 to assess rebound. This information was reported in our Fourth Quarter 2004 Monitoring Report, dated April 8, 2005. Cambria will continue to notify you of future changes to the operational status of the GWE system at this site. Please contact me at 510-420-3344 if you have any questions or require additional information.

Regards,

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

phone: 510-420-3344 fax: 510-420-9170

ALAMEDA COUNTY HEALTH CARE SERVICES







ENVIRONMENTAL HEALTH SERVICES

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

April 29, 2002 StID 3646/ RO0000223

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

Re: Work Plan for Shell-branded Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

Our office has received and reviewed the February 27, 2002 Subsurface Investigation Work Plan for the referenced site prepared by Cambria, your consultant. This proposes the installation of a monitoring well down-gradient of MW-1. This work plan is approved and you should schedule this work as soon as possible. Per your prior reports, groundwater extraction will continue from wells MW-1 and MW-3 and backfill well, BW-D. Please sample from each of the backfill wells and perform your extraction from the highest impacted well.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Barney on Cha

C: B. Chan, files

Ms. D. Lundquist, Cambria Environmental, 1144 65th St., Suite B., Oakland, CA 94608

540Heg

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

January 4, 2002 StID 3646/ RO0000223

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

Re: Shell-branded Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

Our office has received and reviewed the December 18, 2001 Cambria report for the referenced site. As you are aware, this station has historically exhibited elevated MTBE levels in groundwater. In this report, the nearest potential receptor, the canal located northwest of the site was sampled and did not detect gasoline, BTEX or MTBE. The storm drain was identified as a potential conduit that could be a preferential pathway. The storm drains, which could also possibly collect and direct contaminated groundwater because of its permeability was scheduled for sampling at two points, however, the storm drains were dry.

During inspection of the UST system, performed as part of the SWRCB's Appendix D recommendations for handling MTBE releases, a leak from the dispenser containment boot was observed and repaired. Perhaps this was the source(s) of the MTBE release. It seems reasonable, since MW-1 with the highest MTBE concentrations is immediately down-gradient of the dispensers. As a side-note, it appears that elevated MTBE concentrations were also found recently beneath dispensers at the 4411 Foothill Blvd. Former Shell station in Oakland. This could be more than a co-incidence.

Since the mass of MTBE removed from DVE is small relative to that from GWE, Cambria proposes to continue solely GWE in MW-2, MW-1 and a selected tank back-fill well. Because of the absence of TPH in the sample from the nearby canal, and because the storm drain main job is to direct surface water, our office sees no reason to sample the storm drains or the canal. We do request that an additional on-site well be installed between MW-1 and prior boring SB-F. This well would be immediately down-gradient of the highest known MTBE impacted area, possibly used for groundwater extraction, used to monitor the affect of remediation from MW-1 and provide better groundwater characterization.

Ms. Karen Petryna January 4, 2002 StID 3646/ RO0000223 540 Hegenberger Rd., Oakland 94621 Page 2

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Barney M Cha

∨C: B. Chan, files

Ms. Diane Lunquist, Cambria Environmental, 1144 65th St., Oakland, CA 94608 MWrq540HegRd



To: Barney Chan

Voice Phone Number:

From: Tim Woodson (SH&E Compliance Coordinator)

Company: Equiva Services LLC

Fax Number: 707 428 5762

Voice Number: 925-766-3494

MESSAGE

Barney, per our phone conversation, I am sending you a copy of the UST Unauthorized Release (Leak) Contamination Site Report. Please contact me if you have any questions.

Thank You,

Tim Woodson SH&E Compliance Coordinator Equiva Serives LLC (925) 766-3494

Approlix D. being ased-

Date: 11/28/01

Pages: 1 of 1

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ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

September 18, 2001 RO0000223

Ms. Karen Petryna Equiva Services LLC P.O. Box 7869 Burbank, CA 91510-7869 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Shell-branded Station, 540 Hegenberger Rd., Oakland, CA 94621

Dear Ms. Petryna:

This letter serves to comment on the recent First and Second Quarters 2001 Monitoring Reports for the referenced site. As you are aware, this site located near the Oakland Coliseum, has exhibited and continues to exhibit elevated MTBE concentrations in groundwater. Dual-vacuum extraction (DVE) from specific monitoring and tank back-fill wells is being performed with uncertain success. Groundwater concentrations have fluctuated in TPHg concentrations, however, MTBE concentrations have remained elevated, particularly in well MW-3 and MW-1. The tank back-fill wells also have continual elevated MTBE concentrations. Such observations are consistent with an on-going release.

The off-site well MW-4 has not detected the same elevated MTBE levels, however, it is not realistic to believe that the MTBE plume has not migrated off-site. It was presumptuous to stop DVE when this off-site well did not detect elevated concentrations of MTBE. Because you cannot determine where the MTBE has gone does not mean there is no potential risk to the environment. As you are aware, the SWRCB final draft of the Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates recommends interim remedial actions for sites with persistent MTBE concentrations over 10,000 ppb as a way to preserve water quality and financial resources. Therefore, you should continue your DVE on a regular schedule and also include extraction from the tank back-fill wells, such as BW-B, which exhibited 40,000 ppb MTBE during the second quarter monitoring event.

Our office disagrees with the proposed strategy to determine if the sanitary sewer down-gradient of the site is acting as a preferential pathway to the nearby canal. Cambria proposes to collect samples from the canal and also collect samples from the storm drains near and down-gradient of the site, which empty into the canal. Such information would not tell anything about the MTBE plume migrating from this site. It would only tell what contribution is possible from the storm drains and what is impacting the canal. The source of any contamination would not necessarily be from this site and would likely be affected by dilution. It would be much more informative to collect groundwater samples near the porous back-fill near the sanitary sewer. Such sampling was performed at the Shell-branded station at 285 Hegenberger Rd. Please reconsider sampling from other more appropriate locations.

Ms. Karen Petryna September 18, 2001 RO0000223 540 Hegenberger Rd., Oakland Page 2

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Barrey M. Cho

C: B. Chan, files

Ms. D. Lundquist, Cambria Environmental Technology, 1144 65th St., Suite B, Oakland 94608

Prefpath540HegRd

AGENCY



DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

March 13, 2001 StID # 3646

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

Re: Offsite Subsurface Investigation Report for Shell-branded Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

Our office has received and reviewed the February 15, 2001 Offsite Subsurface Investigation Report prepared by Cambria, your consultant. This report includes the following:

- Comments to the County's November 19, 1999 letter
- Results of the August 29, 2000 advancement of off-site borings SB-E, SB-F and SB-G
- Results from the September 5, 2000 installation of MW-4
- Results from the December 15, 2000 groundwater sampling of MW-1 through MW-4
- Site Conceptual Model and
- Sensitive Receptor Survey.

Cambria determined that since the plume is defined and there are no observed sensitive receptors, the dual phase extraction from the monitoring and tank back-fill wells could be discontinued. Quarterly monitoring is recommended for the site since Cambria concludes the site poses a low risk to the environment and human health.

Please keep in mind that the evaluation of human health and environmental risk are only one component of evaluating and characterizing a site as a "low risk groundwater case". The other conditions that must be met are insuring that the leak has been stopped, characterizing the site adequately, verifying the plume is not migrating and no surface water or sensitive receptors are impacted in addition to evaluating risk to human health and the environment. In addition, the State Water Resources Control Board and the San Francisco Regional Water Quality Control Board have issued their own guidelines in handling MTBE and TPH, respectively.

Cambria states that the leak observed in the piping between the USTs and the western dispenser was repaired in 1998, therefore, the source of the leak has been stopped. This may or may not be true. Significant MTBE in groundwater was found in MW-1 and the sample from SB-G, which are down-gradient of the eastern dispensers. It is not likely that the only release at this site occurred from the 1998 piping leak. Had this been the case, groundwater concentrations should have stabilized and decreased down-gradient of the release. Cambria states in their Site Conceptual Model that the BTEX and MTBE plumes are not stabilize. This is apparent when looking at the historical MTBE concentration in MW-1.

Ms. K. Petryna StID # 3646 540 Hegenberger Rd., Oakland CA 94621 March 13, 2001 Page 2

The site has not been adequately characterized. Again, the Site Conceptual Model states that the BTEX and MTBE plume definition status is "undefined". It is clear that both the up-gradient and down-gradient TPH concentrations have not been defined. In the case of MTBE, an elevated concentration (136,000 ppb) has been found in MW-1 and in the grab groundwater sample from SB-G (76,400 ppb), however, MW-4 about forty feet further down-gradient is non-detectable for MTBE. Surely the MTBE plume has not attenuated from these levels as it goes an additional 40 feet. One explanation is that stated in the Site Conceptual Model, which states that the sewer or storm drain trenches may be acting as a preferential pathway for groundwater migration. If this is the case, one could not say that the hydrocarbon plume is not migrating. As you are aware, if the storm or sewer trenches are acting as preferential pathways, the unlined drainage ditch and surface waters could be impacted.

Therefore, the site is not, at this time, a low risk groundwater case. It would appear that additional work is necessary to verify that no additional sources of releases exist, to further characterize the extent of the BTEX and MTBE plumes and to determine if utilities may be acting as a preferential pathway.

The SWRCB in their 3/00 Final Draft for Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates recommends that Interim Remedial Action be taken at sites where the MTBE concentration over 10,000 ppb persists. The SFRWQCB in their Application of Risk-Based Screening Levels and Corrective Action to Sites With Contaminated Soil and Groundwater suggests an aquatic cleanup level of 8000 ppb and a nuisance and odor threshold of 180 ppb. Thus there is rationale for continued remediation at this site. Please continue dual phase extraction from impacted wells, particularly MW-1 and MW-3 until the MTBE concentration at the site has stabilized and decreased below applicable cleanup levels. Please also respond to our observation as to the need to perform addition site characterization.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Barney mi Cla

C: B. Chan, files

Mr. S. Bork, Cambria Environmental Technology, 1144 65th St., Suite B., Oakland CA 94608

Mr. L. Griffin, City of Oakland OES, 1605 MLK Jr. Dr., Oakland CA 94612

540HegRd



State Water Resources Control Board

Division of Clean Water Programs

1001 I Street • Sacramento, California 95814 P.O. Box 944212 · Sacramento, California · 94244-2120 (916) 341-5714 • FAX (916) 341-5806 • www.swrcb.ca.gov/cwphome/ustcf

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Governor

Protection The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.

MAR - 2 2001

Deborah Pryor % Equiva Services LLC Shell Oil Company P O Box 7869 Burbank, CA 91510-7869

LUT 3646 PC

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), NOTICE OF ELIGIBILITY DETERMINATION: CLAIM NUMBER 016222; FOR SITE ADDRESS: 540 HEGENBERGER RD, **OAKLAND**

Your claim has been accepted for placement on the Priority List in Priority Class "D" with a deductible of \$10,000.

We have completed our initial review. The next step in the claim review process is to conduct a compliance review.

Compliance Review: Staff reviews, verifies, and processes claims based on the priority and rank within a priority class. After the Board adopts the Priority List, your claim will remain on the Priority List until your Priority Class and rank are reached. At that time, staff will conduct an extensive Compliance Review at the local regulatory agency or Regional Water Quality Control Board. During this Compliance Review, staff may request additional information needed to verify eligibility. Once the Compliance Review is completed, staff will determine if the claim is valid or must be rejected. If the claim is valid, a Letter of Commitment will be issued obligating funds toward the cleanup. If staff determine that you have not complied with regulations governing site cleanup, you have not supplied necessary information or documentation, or your claim application contains a material error, the claim will be rejected. In such event, you will be issued a Notice of Intended Removal from the Priority List, informed of the basis for the proposed removal of your claim, and provided an opportunity to correct the condition that is the basis for the proposed removal. Your claim will be barred from further participation in the Fund, if the claim application contains a material error resulting from fraud or intentional or negligent misrepresentation.

Record keeping: During your cleanup project you should keep complete and well organized records of all corrective action activity and payment transactions. If you are eventually issued a Letter of Commitment, you will be required to submit: (1) copies of detailed invoices for all corrective action activity performed (including subcontractor invoices), (2) copies of canceled checks used to pay for work shown on the invoices, (3) copies of technical documents (bids, narrative work description, reports), and (4) evidence that the claimant paid for the work performed (not paid by another party). These documents are necessary for reimbursement and failure to submit them could impact the amount of reimbursement made by the Fund. It is not necessary to submit these documents at this time; however, they will definitely be required prior to reimbursement.

Compliance with Corrective Action Requirements: In order to be reimbursed for your eligible costs of cleanup incurred after December 2, 1991, you must have complied with corrective action requirements of Article 11, Chapter 16, Division 3, Title 23, California Code of Regulations. Article 11 categorized the

corrective action process into *phases*. In addition, Article 11 requires the responsible party to submit an *investigative workplan/Corrective Action Plan* (CAP) before performing any work. This phasing process and the workplan/CAP requirements were intended to:

- 1. help the responsible party undertake the necessary corrective action in a cost-effective, efficient and timely manner;
- 2. enable the regulatory agency to review and approve the proposed cost-effective corrective action alternative before any corrective action work was performed; and
- 3. ensure the Fund will only reimburse the most cost-effective corrective action alternative required by the regulatory agency to achieve the minimum cleanup necessary to protect human health, safety and the environment.

In some limited situations *interim cleanup* will be necessary to mitigate a demonstrated immediate hazard to public health, or the environment. Program regulations allow the responsible party to undertake interim remedial action after: (1) notifying the regulatory agency of the proposed action, and; (2) complying with any requirements that the regulatory agency may set. Interim remedial action should only be proposed when necessary to mitigate an immediate demonstrated hazard. *Implementing interim remedial action does not eliminate the requirement for a CAP and an evaluation of the most cost-effective corrective action alternative.*

Three bids and Cost Preapproval: Only corrective action costs required by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. You must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work. If you do not obtain three bids and cost preapproval, reimbursement is not assured and costs may be rejected as ineligible.

If you have any questions, please contact me at (916) 341-5714.

Sincerely,

ORIGINAL SIGNED BY

Shari Knieriem Claims Review Unit Underground Storage Tank Cleanup Fund

cc: Mr. Steve Morse RWQCB, Region 2 1515 Clay Street, Ste. 1400 Oakland, CA 94612 Ms. Susan Hugo Alameda County EHD 1131 Harbor Bay Pkway, 2nd Fl. Alameda, CA 94502-6577

ALAMEDA COUNTY HEALTH CARE SERVICES



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

June 29, 2000 StID # 3646

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

Re: Investigation Work Plan for 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

I received and reviewed the June 19, 2000 Cambria response letter responding to my May 15, 2000 letter. Two items affecting Cambria's original work plan were in contention. I have discussed these items with Mr. Derek Ataide of Cambria and we have come to the following understanding:

- Although our office will not require an additional data point on the west side of the site, it is
 understood that prior to site closure, additional groundwater sampling in this area will be
 necessary to verify that the petroleum plume has not migrated in this direction.
- The proposed borings on the down-gradient edge of the property will not need groundwater elevation measurements since the installation of MW-4, the proposed down-gradient well, will be used to confirm the site's gradient.

You may proceed with the original work plan as proposed with the above items understood. Mr. Ataide mentioned that Cambria might proceed with the three down-gradient borings if the encroachment permit for the off-site well is not shortly received.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C.B. Chan, files

Mr. D. Átaide, Cambria Environmental Technology, Inc., 1144 65th St., Suite B, Oakland CA 94608

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ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

May 15, 2000 StID # 3646

Ms. Karen Petryna Equiva Services LLC P.O. Box 7869 Burbank, CA 91510-7869 ENVIRONMENTAL HEALTH SERVICES

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

Re: Subsurface Investigation Work Plan, Shell-branded Service Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

Our office has received and reviewed the May 8, 2000 Subsurface Investigation Work Plan for the above referenced site as prepared by Cambria, your consultant. As you are aware, this work plan proposes the advancement of three temporary borings in addition to one previously approved permanent well. Soil and grab groundwater samples will be collected from the temporary borings. The additional borings will further characterize the extent of the fuel (mainly MTBE) release to soil and groundwater. Cambria also proposes to review the files of the neighboring ARCO site northeast of this site to better understand the hydrogeology. A cross-section in this direction should eventually be produced to evaluate potential off-site migration.

Because of the obvious MTBE release from the western dispenser, our office requests at least two additional borings be advanced on the western perimeter of the site. I would recommend borings to the west of the underground tank pit and west of the west dispenser area. In addition, please install slotted casing in the borings and determine the water elevation in the borings after equilibration to estimate the gradient. I am aware that the existing wells indicate a north-northeast gradient, however, gradient is known to vary in this area and this information is critical in developing appropriate remediation. After this investigation, please confirm the location of the additional monitoring well.

Our office concurs with the interim remediation being done at this site and recommends continued extraction of groundwater from the four tank backfill wells and MW-1 and MW-3. This interim action should continue as long as MTBE concentrations remain as high as they are currently, in excess of 10,000 ppb. Please provide written comment to this letter within 30 days or no later than June 16, 2000.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Larvey M Che

C. B. Chan, files

Mr. D. Ataide, Cambria, 1144 65th St., Suite B, Oakland CA 94608

Ssiwp540Heg

AGENCY



DAVID J. KEARS, Agency Director

April 6, 2000 StID # 3646

Ms. Karen Petryna Equiva Services LLC P.O. Box 7869 Burbank, CA 91501-7869 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

Re: Shell-Branded Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

It appears that our office has not yet received the letter response work plan responding to my November 19, 1999 letter. This report was initially requested by December 20, 1999. The deadline was later extended to the first quarter 2000 after a request by Cambria was made. The response was to consist of an evaluation of preferential pathways, the report on the installation of a down-gradient off-site well and the determination of what additional investigation is necessary to define the extent of the MTBE plume.

Your March 30, 2000 monitoring report states that the encroachment permit for the off-site well is expected by early April and the installation of the well is anticipated by mid-April. The report also states that a separate report will present the results of your preferential pathway investigation and the two additional borings. It is uncertain whether these two items have been already performed or not. We are not aware of the two additional onsite borings. Please provide our office with a figure indicating the location of these two borings and the logic behind their locations.

As you are aware, this site typifies the "new" MTBE release sites ie a release, which apparently consists mainly of MTBE and lesser concentrations of TPHg and BTEX. It is unknown how this situation occurs and whether this represents an old or current release. The prolonged elevated MTBE concentrations may suggest an ongoing problem. The initial remediation approach consists of the high vacuum extraction of groundwater from the tank backfill wells and wells MW1 and MW3 on a regular basis. Since recent concentrations of MTBE in groundwater from the tank backfill wells has been low, Cambria has initiated a weekly purging of MW1 and MW3. Please be aware, this is **not a sufficient remediation approach** given the continued elevated MTBE concentrations in these wells. It is, therefore, imperative to complete your site characterization so as to have enough information for your feasibility study.

The new final version of the SWRCB Guideline for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates recommends several remediation approaches including soil removal, groundwater purging, soil vapor extraction, in-situ bioremediation, groundwater extraction and reactive barriers. This site will likely require the use of a combination of these recommended approaches.

Ms. K. Petryna 540 Hegenberger Rd., Oakland 94621 StID # 3646 April 6, 2000 Page 2.

Please provide those items requested above which exist and a schedule for those items which are expected for your future work plan within 30 days or no later than May 8, 2000.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C. B. Chan, files

Mr. D. Átaide, Cambria Environmental Technology, 1144 65th St., Suite B., Oakland CA 94608

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CAMBRIA



To:	Barney Chan	_
Company:	ACHCSA	_
Fax:	(510) 337-9335	_
Phone:	(510) 567-6765	_

From:	Darryk Ataide	
Phone:	(510) 420-3339	
Pages:	2	
Date:	Dec. 16, 1999	
Re:	540 Hegenberger, Oakland	

Hard Copy to Follow?

Yes 🔲

No D

Barney,

Fax

Following is a Request for Work Plan Extension for the referenced site.

Thank you for your patience and continued assistance with this project.

Darryk Ataide

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

CAMBRIA



VIA FACSIMILE

December 16, 1999

Barney Chan Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: Request for Work Plan Extension
Shell-branded Service Station
540 Hegenberger Road
Oakland, California
Incident #98995752
SAP #135694
Cambria Project #240-0414



Dear Mr. Chan:

On behalf of Equiva Services LLC (Equiva), Cambria Environmental Technology, Inc. (Cambria) is submitting this Request for Work Plan Extension in response to the Alamdea County Health Care Services Agency (ACHCSA) letter to Equiva dated November 19, 1999. Cambria proposes to submit a letter response and work plan during the first quarter of 2000.

We appreciate your continued assistance with this project. Please call me at (510) 420-3339 if you have any questions or comments.

Sincerely,

Cambria Environmental Technology, Inc

Darryk Ataide

Project Manager

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

Cambria Environmental Technology, Inc. cc: Karen Petryna, Equiva Services LLC, P.O. Box 7869 Burbank, California 91501-7869

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1144 65th Street Suite B Oakland, CA 94608 Tel (516) 420-9700 Fax (510) 420-9170





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November 23, 1999

Mr. Barney Chan Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, 2nd Floor Alameda, California 94502

Re: Certified List of Record Fee Title Owners for:

Shell-branded Service Station 540 Hegenberger Rd. Oakland, CA Incident No. 98995752

Dear Mr. Chan:

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

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

Sincerely,

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

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

Ok

Oakiand, CA Sonoma, CA Portland, OR

Seattle, WA

Cambria Environmental Technology, Inc.

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

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



November 19, 1999 StID # 3646

Ms. Karen Petryna Equiva Services LLC P.O. Box 6249 Carson, CA 90749-6249 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700 (510) 337-9432

Re: Shell-Branded Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

Our office has received and reviewed the November 3, 1999 Second Quarter 1999 Monitoring Report prepared by Cambria for the above referenced site. This report provides information on the sampling of the three monitoring wells, the removal of groundwater from monitoring and tank back fill wells and a well survey. It is evident that the presence of elevated MTBE in groundwater poses the greatest immediate threat at this site. Our office is pleased that groundwater removal was done from the two monitoring and four tank back fill wells. This weekly groundwater removal was initiated on 7/29/99 and continued up to 8/30/99. Will this action continue on a regular basis?

Our office recommends that you sample and analyze these wells after groundwater removal to 1) estimate the amount of chemical removed and to 2) see if any remediation of groundwater is occurring. It appears that on an interim basis, groundwater removal should continue as long as concentrations of MTBE remain high. This, however, may be only treating the result of an ongoing problem, not the problem itself.

Please determine the source(s) of the MTBE release and attempt to provide an iso-concentration profile in soil and groundwater. Is the source of the MTBE from past or present releases? What is your theory to explain the apparent release of MTBE and the relative absence of TPHg and BTEX? This phenomenon is an alarming yet common situation at many newly installed and upgraded service stations. Obviously, we are interested in understanding the cause of the release to determine the appropriate remediation.

I have previously written to you regarding the evolving requirements for handling MTBE releases and you are now aware of the requirement for a site conceptual model, SCM. Most of these requirements have been or will be addressed shortly by your consultant. Cambria stated in their report that they are working on their evaluation of preferential pathways and will soon install the down-gradient well, previously proposed. There may be a need for additional borings or wells to define the lateral extent of MTBE. Please comment on this. You will also need to determine the vertical extent of MTBE by advancing and sampling a deep boring. In addition, please evaluate your remediation options and determine whether the interim groundwater removal will be your remediation of choice.

Ms. Karen Petryna 540 Hegenberger Rd., Oakland 94621 StID # 3646 November 19, 1999 Page 2.

Please provide a written response to this letter within 30 days or no later than December 20, 1999.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C: B. Chan, files

Mr. D. Átaide, Cambria Environmental Technology, 1144 65th St., Suite B., Oakland CA 94608

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ENVIRONMENTAL HEALTH SERVICES

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

April 30, 1999 StID # 3646

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

Re: Shell-branded Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

Our office has received and reviewed the Fourth Quarter 1998 Monitoring Report for the above site as prepared by your consultant, Cambria. This site is similar to other Shell-branded sites under my oversight, ie releases from dispensers may have contributed to a MTBE plume which has yet to be delineated. As you are aware, an off-site well is being proposed, following a utility and sensitive receptor survey. In an attempt to provide some consistency in handling these MTBE sites, I have been requesting items such as determining the integrity of the underground tank system, the above mentioned receptor survey and the delineation of the MTBE plume. When possible, the source of the contaminant should be removed. To this end, I remind you of my prior request to sample and analyze the groundwater from the tank pit. Previous evidence indicated releases from the dispenser and piping. The gravel backfill of the piping run may have acted as a preferential pathway for contamination.

One puzzling item was observed in the monitoring report; the large difference in the reported MTBE concentration for MW-1 run by Method 8020 vs. that run by 8260. You should contact your laboratory and request an explanation for this significant difference (153,000 ppb vs 33000 ppb).

Please sample and analyze the groundwater from the tank pit during your next sampling event. Your evaluation of data should comment on whether the removal of groundwater from the tank pit would be beneficial.

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: B. Chan, files

Mr. D. Ataide, Cambria Environmental Technology, 1144 65th St., Suite B, Oakland 94608 mon540Heg

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

March 2, 1999 StID # 3646

Ms. Karen Petryna Equiva Services LLC P.O. Box 6249 Carson, CA 90749-6249 **ENVIRONMENTAL HEALTH SERVICES**

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

Re: Subsurface Investigation Work Plan for Shell-branded Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Ms. Petryna:

Thank you for the submission of the February 25, 1999 work plan for the above referenced site as prepared by your consultant, Cambria Environmental Technology, Inc. (Cambria). This work plan responds to my January 4, 1999 letter, which expressed the County's concerns over the elevated MTBE concentrations in soil and groundwater at this site. Our office requested that items be addressed consistent with the Water Board's draft MTBE Road Map to Compliance.

To further characterize the site, Cambria proposes to install an off site monitoring well, tentatively located on the north side of Edes Ave., just south of the existing ARCO station. The location of this well is based on the groundwater gradient found in the 3rd and 4th Quarter 1998 monitoring events. This location is acceptable, since the gradient is consistent with that of the ARCO site and would make this well up-gradient of ARCO. In addition, the ARCO site is near closure as that site has been determined to be of low risk.

An evaluation of preferential pathways will be done by contacting underground service alert (USA) and the local Department of Public Works. A map indicating the location and depths of utilities should be provided. Should potential conduits exist, sampling along the conduit should be proposed and the location of the off-site well reconsidered. In addition, a sensitive receptor survey will be performed. Surface water bodies and irrigation and drinking water wells will be sought.

Because of the elevated concentrations of MTBE found on-site, our office also requests the following actions:

- Please verify that the current underground tank system is tight through evaluation of recent tank and piping test results. Please provide the results of this evaluation in your upcoming monitoring report.
- Please continue to sample tank backfill groundwater. Consideration should be given for the removal of groundwater from the tank pit since it is a potential "sink" for groundwater and releases.

You may perform the preferential pathways and sensitive receptor survey as soon as possible. Please inform our office if the location of the off-site well is change and when it will be installed.

Ms. K. Petryna StID # 3646 Shell-branded station, 540 Hegenberger Rd., Oakland March 2, 1999 Page 2.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

Barrey M Cha

C: B. Chan, files

Mr. D. Ataide, Cambria, 1144 65th St., Suite B, Oakland, CA 94608

WpMTBE540Heg

January 4, 1999 StID # 3646

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

Re: Shell-branded Service Station, 540 Hegenberger Rd., Oakland CA 94621 WIC #204-5508-5900

Dear Ms. Petryna:

Our office has recently received and reviewed the November 9, 1998 and November 19, 1998 Well Installation Report and Third Quarter 1998 Monitoring Report, respectively, for the above site as prepared by Cambria Environmental Technology (Cambria). The results of these investigations confirm the release of gasoline and MTBE that have impacted the shallow groundwater beneath the site. These results are predictable given the results from sampling from recent borings and samples from piping repair and station upgrade.

My first impression of the site is that the main chemical of concern is MTBE. Elevated levels of MTBE, from 12,000 to 31,000 ppb, were reported in the backfill monitoring well and monitoring wells MW-1 and MW-3 in the initial sampling event on July 15, 1998. The more recent August 26, 1998 sampling event reported even higher MTBE concentrations, up to 75,000 ppb in the post-purge sample from MW-3. This site should be handled in a manner consistent with the SFRWQCB recommendation for their MTBE Road Map to Compliance.

The following items should be adequately addressed:

- Has the site been adequately characterized? If not, what additional investigation is proposed?
- Have the sources been determined and have they been removed if possible?
- Are there any current or future public health or ecological threats?
- Do you have a stable plume?
- Is a risk management plan in place?

When the above items are addressed, you should proceed with a Risk-Based Evaluation. This should include a site conceptual model (SCM) which identifies all major source areas, all major exposure pathways and all current and future receptors. To aid in developing the SCM, a well and receptor survey and a conduit study should be performed. When long term monitoring demonstrates a stable plume, site closure may be recommended along with institutional controls, if necessary within an acceptable risk management plan.

Please address the above items in writing within 45 days or by February 22, 1999.

Ms. K. Petryna StID # 3646 540 Hegenberger Rd., WIC #204-5508-5900 January 4, 1999 Page 2.

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

Sincerely,

Barney M. Chan Hazardous Materials Specialist

C: B. Chan, files
Mr. D. Ataide, Cambria, 1144 65th St., Suite B, Oakland CA 94608

540 Heg-MTBE

510 420 9170 P.01/01

FACSIMILE

To:

Barney Chan

Organization: Alameda County Department of

Environmental Health

Fax #:

(510) 337-9335

Re:

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11.

540 Hegenberger Drilling

Date:

July 13, 1998

Pages:

1, including this cover sheet.

Mr. Chan:

I am sending this fax to inform you that I intend to install three monitoring wells and one soil boring Tuesday July 14, 1998, as proposed in Cambria's May 14, 1998 Work Plan and approved in your May 26, 1998 letter. If you foresee any problems with this schedule, please page me at (510) 805-7915 at your earliest convenience.

Thank you for your assistance with this project.

Maureen Feineman

From the desk of...

Maureen D. Feineman Geologist Cambria Environmental Technology, Inc. 1144 65th Street, Suite C Oakland, CA 94608

> (510) 420-0700 Fax: (510) 420-9170

ALAMEDA COUNTY

HEALTH CARE SERVICES





DAVID J. KEARS, Agency Director

May 26, 1998 StID # 3646 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

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

Re: Investigation Work Plan for Shell Service Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Mr. Perez:

Our office has received and reviewed the May 14, 1998 Investigation Work Plan for the above site as prepared by Cambria. This work plan responds to my April 23, 1998 request for further investigation of the petroleum release from the above site. Three monitoring wells and one boring are proposed. In addition, a water sample from the tank backfill will be collected and analyzed. It is anticipated that one soil sample will be collected from each boring for chemical analysis. The proposed analytes are TPHg, BTEX and MTBE. MTBE in groundwater will be confirmed by EPA Method 8260. The boring sample will be located near the existing cashier building and be analyzed for the specific parameters useful for risk assessment purposes; dry bulk density, moisture content, porosity and fraction organic carbon.

This work plan is accepted with the following conditions:

- Please move the location of the western boring/well northward to align with the former locations of D-1 and SB-5.
- Please inform our office 72 working hours prior to this field work.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

C: B. Chan, files

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Ms. M. Feineman, Cambria Environmental, 1144 65th St., Suite B, Oakland, CA 94608

Wpap540

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY





April 23, 1998 StID #3646

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

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

Re: Subsurface Investigation Report for Shell Service Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Mr. Perez:

Our office has received and reviewed the April 15, 1998 Subsurface Investigation Report for the above referenced site prepared by Cambria Environmental Technology, Inc. (Cambria). This report summarizes the results of the recent March 1998 Geoprobe boring investigation at the This investigation follows these past investigations:

- The detection of soil contamination beneath piping at dispenser 1 in August 1996;
- The detection of free product in the piping run between one of the dispensers and the gasoline tank; and
- The detection of TPHg, TPHd and BTEX beneath dispensers 1,2 and 6 during the 1998 station upgrade.

Because of the rainy conditions during the station upgrade, no remediation was done after the detection of the free product.

In March 1998, soil borings SB-1 through SB-5 were advanced around the areas of known petroleum release, dispenser 1 and the repaired piping run. Both soil and grab groundwater samples were taken for chemical analysis. Additional parameters including porosity, moisture content, fractional organic carbon and bulk density were also determined on specific samples. These results indicate the major petroleum release to be TPHg, BTEX and MTBE and its location is near dispenser 1 and the underground tank pit. The southernmost borings, SB-4 and SB-1 did not detect appreciable contamination. At this time, our office requests additional site characterization along with a groundwater investigation. Your work plan should determine the extent of both soil and groundwater contamination. The extent of free product, if present, should also be determined. The high concentration of TPHg detected in SB-5 and the observed free product within the piping run indicate the likelihood of free product.

Mr. Alex Perez StID # 3646 540 Hegenberger Rd. April 23, 1998 Page 2.

Although regional and anticipated groundwater flow is southwesterly towards the bay, it has been found that site specific gradient is variable in this area. The fill material in shallow soil may give rise to preferential groundwater flow pathways.

Our office recommends additional site investigation and the conversion of selected borings into permanent monitoring wells. Should free product be present, please indicate how it will be remediated. Boring(s) should be advanced near the noted Existing Building for future risk evaluation. You should also collect and analyze a water sample from the existing underground storage tank pit.

Please submit a work plan to address the above concerns within 30 days or by May 25, 1998.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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Ms. M. Feineman, Cambria Environmental, 1144 65th St., Suite B Oakland, CA 94608

S**s**1540

To:

Barney Chan

Organization: Alameda County Dept of

Environmental Health

Fax #:

(510) 337-9335

Re:

540 Hegenberger

Date:

March 5, 1998

Pages: .

2, including this cover sheet.

FACSIMILE

SNO 3646

Barney:

Here is the site plan for the revised boring locations. If you need to reach me tomorrow, my pager number is 805-7915.

Maureen

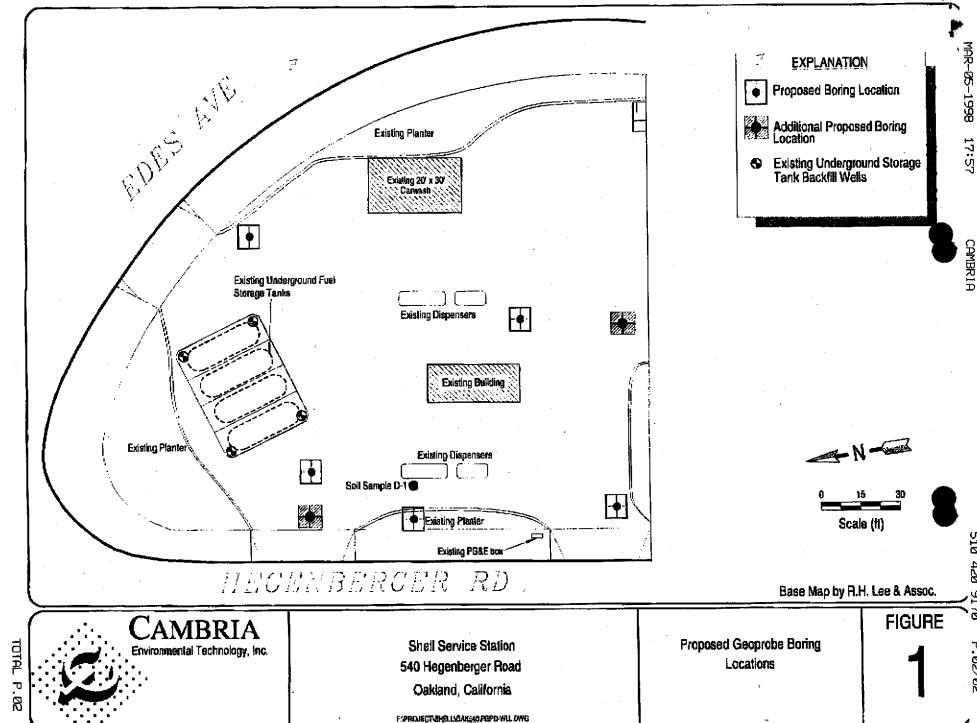
3/9/98 - Spope w/ Maureen Frieman, She said just the 5 ougrail bourge were advanced on 3/6/98. Some oder notreoble en bourge near despenses/tenhe & none upg towards the south. Expert report W/i ~ 45 days.

From the desk of ...

Maureen D. Feineman Geologist Cambria Environmental Technology, Inc. 1144 65th Street, Suite C Oakland, CA 94608

> (510) 420-0700 Fax: (510) 420-9170

17.



CAMBRIA

2/6/98 Mike Paves - Cantria stated that the contractor performing the dispenser/pipeline apgrade at 320 Hag Rd encountered some free product The trench slopes towards the tank pit. The Deak has been repaired With the onsoring storm, it's unreamable to excavate the pying line or remove largeants of water I agreed that as long as free preduct is removed, Cambria Could encorporate addn't target geoprobes in areas of hum release in addnt to the lowting approved up

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

February 26, 1997 StID # 3646

Mr. R. Jeff Granberry Shell Oil Products Co. P.O. Box 4023 Concord, CA 94524-4023 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Re: Investigation Work Plan, Shell Service Station, 540 Hegenberger Rd., Oakland CA 94621

Dear Mr. Granberry:

Our office has received and reviewed the January 9, 1997 Investigation Work Plan for the above referenced site as prepared by Cambria. This work plan is in response to the County's request for site characterization subsequent to detecting contamination in a soil sample beneath the westernmost dispenser at the site.

The work plan proposes advancing ten (10) Geoprobe borings covering the entire site, with specific borings for soil and groundwater samples and specific borings for soil sampling only. My general impression of the work plan is that it appears excessive if the only confirmed release is from beneath the western dispenser area. If this area is the only area of suspected fuel release, I recommend advancing the four proposed Geoprobe borings in the four major compass directions around the western dispenser and take both soil and groundwater samples from each of these borings. Should field screening indicate contamination in any of these borings, another boring further downgradient would be recommended. You may also choose to take a grab groundwater sample from one of the existing observation wells within the tank pit for chemical analysis. Samples should be run for TPHg, BTEX and MTBE.

You may assume a west-northwesterly gradient at this site based upon the gradient at the Arco Station at 566 Hegenberger Rd.

Please comment on my observations and notify me prior to your field work. I may be reached at (510) 567-6765.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: B. Chan, files

N. S. MacLeod, Cambria, 1144 65th St., Suite B, Oakland 94608 wpap530

ALAMEDA COUNTY

HEALTH CARE SERVICES







DAVID J. KEARS, Agency Director

November 7, 1996 StID # 3646

Mr. Jeff Granberry Shell Oil Products Co. P.O. Box 4023 Concord, CA 94524

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 Work Plan for Subsurface Investigation at 540 Hegenberger Rd., Oakland CA 94621

Dear Mr. Granberry:

Our office has received and reviewed a copy of the analytical report for a soil sample taken beneath a repaired dispenser at the above referenced site. The report was sent by Mr. Paul Waite of Cambria Environmental Technology to Mr. Don Hwang of our The analytical results of the soil sample (3400 ppm office. Total Purgeable Petroleum Hydrocarbons, 720 ppm MTBE and 17, 280, 84, 450 ppm BTEX respectively) indicate that a release of petroleum hydrocarbons has occurred, the extent of which must be determined and potentially remediated. We have also received an Unauthorized Release (Leak) Report dated 8/21/96 completed by Mr. Brett Hovland of Shell Oil. The leak reports state that a site investigation is planned. Our office agrees with this recommendation.

Therefore, please submit a work plan for both soil and groundwater characterization of the above site. Your work plan for this site within 45 days or by December 16, 1996.

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

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

c: B. Chan, files

anes W El

Mr. P. Waite, Cambria Environmental Technologies, 1144 65th St., Suite B, Oakland CA 94608

Mr. D. Hwang, ACEDH

wprq540

Transfer of Eligible Local Oversight Case Shell o'cl Co. P.o Box 2099 Houston Tx 77252 STID 3/46 Date of input/By: From: B.CHAN Shell Service Statum To be eligible for LOP, case must meet 3 qualifications: 1. Y (N) Tanks Removed? # of removed? _____ Date removed: ____ Samples received? Contamination level: 3400 ppm 17, 280,84, 45 upm

Type of test 714 q B1EY 2. Y N Contamination should be over 100 ppm TPH to quality for LOP Petroleum? Circle Type(s): • Avgas •leaded •fuel oil •jet •waste oil •kerosene •solvents diesel Procedure to follow should your site meet all the above qualifications: _ Close the deposit refund case. 1. Account for ALL time you have spent on the case. Turn in account sheet to Leslie. If there are funds still remaining it is still better to transfer the case to LOP as the rate for LOP allows more overhead. DO NOT attempt to continue to oversee the site simply because there are funds remaining! Remaining DepRef \$'s: DepRef Case Closed with Candyce/Leslie? Y N (If no, explain why below.) Submit the completed A and B permit application forms to NORMA. 2.

Give the entire case to the proper LOP staff.

3.

ALAMEDA COUNTY -ENVIRONMENTAL HEALTH



08/19/96

UNDERGROUND STORAGE TANK CLEANUP SITE

AGENCY#: 10000 SOURCE OF FUNDS: F-FEDERAL INSPECTOR: JE

StID: 1120 SUBSTANCE: 8006619 -Gasoline

SITE NAME: Unocal SS#1871

DATE REPORTED : 05/14/92

ADDRESS : 96 MacArthur Blvd DATE CONFIRMED: 05/14/92

CITY/ZIP : Oakland, CA 94610 MULTIPLE RP's : N

CASE TYPE: S CONTRACT STATUS: 4 PRIOR:1C3 EMERGENCY RESPONSE:

RP SEARCH : S

DATE END: 07/08/92

PRELIM ASSESSMENT : DATE BEGIN:

DATE BEGIN:

DATE END: DATE END:

REMEDIAL INVESTIG : REMEDIAL ACTION :

DATE BEGIN:

DATE END: DATE END:

POST REMED MONITOR:

DATE BEGIN:

TYPE ENFORCEMENT ACTION TAKEN: 1 DATE OF ENFORC. ACTION: 07/08/92

UNDERGROUND STORAGE TANK CLEANUP SITE - SCREEN #2

LUFT FIELD MANUAL CONSIDERATION:

CASE CLOSED: on:

DT EXC START:

REMEDIAL ACTIONS TAKEN:

RP #1: CONTACT: Robert Boust

RP COST:

RP COMPANY NAME: Unocal

ADDRESS: P O Box 5155

Ph:

CITY/STATE: San Ramon C A 94583

△TeMENT:

HBC 05 (8/90)

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY DAVID J. KEARS, Agency Director



Alameda County CC4580 Environmental Health Services 1131 Harbor Bay Pkwy., #250 Alameda CA 94502-6577 (510)567-6700 FAX(510)337-9335

May 22, 1996

Dear sir:

The attached "Notice of Reimbursement" is not a bill. It is required by our contract with the State Water Resources Control Board that we send this letter to all responsible parties involved in a leaking petroleum underground tank site. A responsible party may be the operator of the tank or the property owner. You fall into the following category:

The site is contaminated and the Alameda County Local Oversight Program will be overseeing the cleanup through to a closure of the case. This letter says that you will be billed for the time that our technical staff spends on your case after the work has been accomplished.

We will work with you to expedite the remediation of your site.

If you have any questions please call this office at 567-6700 and ask for the specialist noted in the accompanying notice.

Sincerely,

Thomas F. Peacock, Supervising HMS

Environmental Health Services