

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
8-30-06

R0343

August 29, 2006

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

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

Dear Mr. Brown:

Subject: Fuel Leak Case RO0000343, Shell, 461 8th St., Oakland, CA 94612

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the subject site including the June 7, 2006 Subsurface Investigation Work Plan prepared by Cambria Environmental. It appears this work plan replaces the December 16, 2003 Cambria work plan, which was approved but only completed as one hand auger sample, HA-1. This sample was located on the opposite (east) side of the BART tunnel and only shows that low levels of MTBE in groundwater have migrated to this location from an up-gradient source. The former USTs at the former Chevron station were removed well prior to the use of MTBE in gasoline. Access for on-site borings was not received and attempts for borings and well installation were unsuccessful.

It appears this new work plan concentrates on on-site investigation only. No additional attempt to determine off-site delineation of plume or other potential sources of the off-site contamination is proposed. We request that you address the following technical comments when performing the proposed work and submit the technical reports requested below.

TECHNICAL COMMENTS

1. Technical Report Request- Please submit a copy of the May 2004 Treadwell and Rollo reports mentioned in your work plan.
2. We request that all borings be advanced to groundwater and the borings be minimally screened with a PID instrument at 5-foot intervals, at changes in lithology, signs of contamination and at the soil-water interface. Those samples indicating contamination should be analyzed by a certified laboratory and should include the soil-water interface sample at a minimum. They should be analyzed for TPHg, BTEX, MTBE, TAME, ETBE, TBA, EDB and EDC by EPA Method 8260. Although the work plan proposes groundwater sampling from borings B-20 through B-23 only, we request that groundwater samples be collected from each boring. Chemical analysis on groundwater samples other than B-20 through B-23 should be based upon the results of screening of the soil samples, the presence of sheen and the presence of petroleum odors.
3. We believe that no other source of petroleum release have been identified which could be responsible for the off-site contamination in wells S-5 and S-6. We recommend off-site sampling to delineate the petroleum plume and to identify

other off-site sources as alluded to by your consultant. This information is required prior to site closure.

4. **Electronic Submittal of Reports-** We have noticed that although your reports and correspondences have been submitted to the Geotracker database they have not all been submitted to the County ftp site. 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](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

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

5. **On-site Access Agreement-** We understand that the new property owner is amenable to the proposed work. Please notify our office if you have not received a signed access agreement within 30 days of this letter so we may help you gain access.

TECHNICAL REPORT REQUEST

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

- September 29, 2006- Upload copy of Treadwell & Rollo report.
- September 29, 2006- Upload reports/correspondences post 1/31/06 for site to the County ftp site.
- November 29, 2006- Soil and Groundwater Investigation report.

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.

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) 567-6765.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Ms. Ana Friel, Cambria Environmental, 270 Perkins St., Sonoma, CA 95476
A.F. Evans Company, c/o Greg Lunkes, 1000 Broadway, Ste. 300, Oakland,
CA, 94507

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



06-12-02

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

June 11, 2002

Ms. Karen Petryna
Shell Oil Products US
P.O. Box 7869
Burbank, CA 91510-7869

Dear Ms. Petryna:

Subject: Fuel Leak Case No. RO0000343, 461 8th St., Oakland CA 94607

Alameda County Environmental Health, Local Oversight Program (LOP), has received and reviewed the June 7, 2002 Agency Response and Work Plan Addendum for the referenced site prepared on your behalf by Cambria. This letter report responds to our office's May 6, 2002 letter responding to your proposed scope of work for this site. It appears that you have addressed all the County concerns expressed in our letter. We, therefore, summarize the items of concern and offer comment as follows.

Technical Summary and Comments to Work Plan Addendum

- Figure 2 provided indicates all proposed locations of borings and monitoring wells
- The on-site boring locations are in the same general location as the earlier borings, which did not take deeper samples, borings B-4 and B-7. Our office will not require samples deeper than 30' unless vertical extent of contamination is an issue.
- Continuous coring will be used in a number of strategic well and boring locations to see if permeable lenses exist.
- Borings and wells have been added in suggested locations, between wells S-9 and S-5 and between S-6 and the most down-gradient proposed well.
- Our office respects your opinion that permanent wells near potential off-site sources of fuel releases will provide much more information and evidence than temporary borings. The other potential sources are viable given the suggested scenario of potential dewatering in the cut and cover portion of the BART tunnel during construction activities.

Please notify our office prior to performing your subsurface investigation. You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Rory Cambell, Hanson, Bridgett, Marcus, Vlahos & Rudy, 333 Market St., Suite 2300, SF,
CA 94105-2173
Wells Fargo Bank, Tr., c/o Pacific Property, 364 Bush St., SF, CA 94104-2805
R. Casteel & Co., P.O. Box 6839, Moraga, CA 94570

Wpadd461 8thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



05-07-02

ENVIRONMENTAL HEALTH SERVICES

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

May 6, 2002
RO0000343

Mr. Karen Petryna
Shell Oil Products US
P.O. Box 7869
Burbank, CA 91510-7869

Re: Fuel Leak Case RO0000343, 461 8th St., Oakland, CA 94607

Alameda County Environmental Health, Local Oversight Program, (LOP), has reviewed the case file for the referenced site including the April 30, 2002 Agency Response and Investigation Work Plan prepared by Cambria Environmental, your consultant. Your response to my March 12, 2002 letter states the following:

- The rose diagram of historical gradient indicates a consistent southerly gradient
- The site conceptual model does not offer a possible scenario for the migration of petroleum from onsite to the BART tunnel or to the down-gradient wells. As additional information is gathered from your proposed investigation, a SCM should be developed.
- The groundwater flow rate estimated by Cambria offers little clarification since flow velocity ranging from 0 and 17,250 feet per year is estimated. At some point, a migration pathway must be suggested to explain the observed contamination. This seemingly would have to include some type of preferential pathway for migration.
- No information could be obtained to explain why Westhollow laboratory identified the released product as a Shell product. Perhaps there are specific tests or practices used historically to distinguish the various branded fuels.
- The proposed work plan addresses the need for additional sampling to evaluate the source and migration pathway and delineate the hydrocarbon plume.

Technical Comments to Investigation Work Plan

- A total of seven wells and two borings are indicated on Figure 2 of your proposed investigation work plan, contrary to the eight borings and six wells mentioned in your work plan.
- One of the County concerns is the lack of deep soil samples onsite. This leaves the possibility that the early release from the product line to soil may have been over-excavated and therefore not detected in subsequent soil investigations. If the exact location of the line leak can be determined, a deep boring should be advanced there. If the location cannot be determined, please explain why the proposed boring locations are appropriate. It appears that there has been only one deep soil sample collected from the dispenser areas.
- The proposed well locations on-site are approved. Our office recommends the use of continuous coring and logging to possibly identify permeable lenses for preferential migration. Soil samples should be screened at least every five foot interval.
- Our office recommends at least one additional boring between wells S-9 and S-5 for site characterization.
- The wells proposed adjacent to the former Chevron Station may not be necessary. Temporary borings should be considered instead and permanent wells only if contamination observed.
- Please explain the logic for the location of the proposed well southwest of S-6. Do you assume the plume is funneled in this direction by the BART tunnel? Please consider adding another boring between S-6 and this proposed well for site characterization.

Mr. Karen Petryna
461 8th St., Oakland, CA 94607
May 6, 2002
RO0000343
Page 2

- Please include the additional analysis for the following compounds by EPA Method 8260; TAME, ETBE, DIPE, TBA, EDB and EDC. Monitoring wells S-8, S-5 and S-6 should be sampled for these analytes once minimally.
- Once the migration pathway is determined an appropriate remediation approach should be proposed. Considering the amount of product collected from BART in the past, the release from the former Shell site must have been much greater than the initial amount assumed.

Please provide your written response and work plan addendum to our office within 30 days or no later than June 10, 2002.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. J. Jones, 1144 65th St., Suite B, Oakland, CA 94608

Rory Campbell, 333 Market St., Suite 2300, San Francisco, CA 94105-2173

Wells Fargo Bank National Association, Tr., c/o Pacific Property, 364 Bush St., San Francisco, CA
94104-2805

R. Casteel & Co., P.O. Box 6839, Moraga, CA 94570

InvWP461 8thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



B-1302

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

March 12, 2002
RO0000343

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

RE: Meeting on Former Shell Service Station, 461 8th St., Oakland, CA 94607

Dear Ms. Petryna:

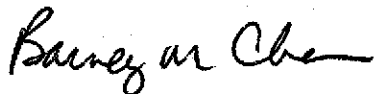
This letter serves to recount our meeting on 3/11/02 at the County offices regarding the referenced site. Although no additional clarity resulted in our meeting, the following items required attention:

- Please provide a rose diagram for the historic groundwater gradient
- Please provide a site conceptual model to explain the fate and transport of the historic catastrophic fuel release from the piping at this site.
- Please determine the groundwater flow rate at this site. This typically requires a pumping test or another aquifer testing method. This data should assist in your calculations to determine the feasibility of fuel migration from this site to the BART tunnel location and in developing your site conceptual model.
- Please research the referenced Westhollow laboratory results, which identified on several occasions the fuel release as Shell product and provide us with a copy of the results.
- Please discuss the appropriateness of additional soil and groundwater sampling and propose an investigation if warranted. Consideration of temporary sampling should be done not only onsite, but off-site to give more evidence of an off-site source of the down-gradient petroleum contamination. In addition, the extent of the plume is undefined and a work plan to complete delineation was previously requested of you in my April 11, 2001 letter.
- The release scenario for the alleged down-gradient sources has not been provided, as such, we do not concur with your recommendation to suspend groundwater extraction from wells S-5 and S-6. Please continue to gauge all wells on a semi-annual basis, monitor all wells except S-4 on a semi-annual basis and remove product and over-purge wells S-5 and S-6 during these events.

Ms. Karen Petryna
March 12, 2002
RO0000343
461 8th St., Oakland 94607
Page 2

Please provide your written response to this letter within 30 days or no later than April 15, 2002.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

D. Drogos, ACEH

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

Rory Campbell, Law Offices, 333 Market St., Suite 2300, San Francisco,
CA 94104-2173

Wells Fargo Bank National Association, Tr., c/o Pacific Property, 364 Bush St.,
San Francisco, CA 94104-2805

R. Casteel & Co., P.O. Box 6839, Moraga, CA 94570

02-461 8thSt

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



07-03-01

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

July 2, 2001
StID 4254/ RO0000343

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

Mr. Thomas Bauhs
Chevron Products Company
P.O. Box 6004
San Ramon, CA 94583

Re: Subsurface Investigation of Former Shell Station, 461 8th St., Oakland CA 94607

Dear Ms. Petryna and Mr. Bauhs:

Our office has received the May 14, 2001 Agency Response letter report by Cambria Environmental which addresses my April 11, 2001 letter. In my letter, I requested additional information regarding the likelihood of the former Shell station being the source of the off-site groundwater contamination being found in wells S-5 and S-6 located on the northwest and southwest corners of 7th and Broadway, respectively. In Cambria's response letter, they recommend the following on your behalf:

- Performing an extensive utility conduit survey adjacent to this site and along the BART line.
- Performing a sensitive receptor survey within a ½ mile radius of the site and
- Preparing cross-sectional diagrams including the utility information researched.

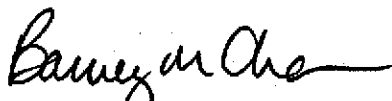
This work is approved.

In response to my request to further delineate the hydrocarbon plume, Cambria argues that there is no technical basis to believe the former Shell site is the source of the free product and elevated dissolved contamination being found in either of the mentioned wells. They state that the location of the past fuel release into the BART tube is close to the former Chevron station located at 636 Broadway. Our office concurs that there is enough evidence to request information regarding the proper closure of underground tank(s) at this site. Therefore, as authorized by Section 25289 (b) of Chapter 6.7 of the Health and Safety Code, our office requests any relevant information regarding testing and monitoring for the underground tank(s) closed at the former Chevron station at 636 Broadway. **Please submit this information within 30 days or no later than August 3, 2001.**

Ms. Petryna and Mr. Bauhs
StID #4254/RO0000343
461 8th St., Oakland CA 94607
July 2, 2001
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

Ms.J. Jones, Cambria, 1144 65th St., Suite B, Oakland CA 94608
Rory Campbell, Law Offices, 333 Market St., Suite 2300, San Francisco, CA 94104-2173
Wells Fargo Bank National Association, Tr., c/o Pacific Property, 364 Bush St., San Francisco,
CA 94104-2805

R. Casteel & Co., P.O. Box 6839, Moraga, CA 94570

2-461 8thSt.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-12-01

20343

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

April 11, 2001
StID # 4254

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

Re: Former Shell Station Station, 461 8th St., Oakland CA 94607

Dear Ms. Petryna:

The above referenced site is not thoroughly understood and therefore, its oversight and direction has not been easy. As your are aware, this former Shell station was implicated as a source of free product gasoline which leaked into the Bay Area Rapid Transit (BART) tunnel in 1979. Somehow, the product was "identified" as Shell gasoline. This theory was supported when a test of the product lines at this station indicated a leak. The station replaced the fuel lines and the station operated until 1980 when the underground tanks were removed. Shell installed monitoring wells on and off-site with BART review and concurrence. No records or reports exist describing the tank removals or any sampling results. Additional on-site investigation at the assumed locations of the former underground tanks, piping and dispensers was done and no indication of significant soil contamination was observed.

However, further down-gradient from this site in wells S-5 and S-6, free product or elevated gasoline and BTEX concentrations has been observed. Equiva Services has done extensive historical research including looking at various state and federal data bases, adjacent property use and underground utility surveys in an attempt to identify other possible sources of this contamination. Although other sites have been identified, no releases or suspected releases are documented. Therefore, although the onsite data for this site indicates relatively little soil and groundwater contamination and elevated gasoline and free product has been observed off-site, no other responsible parties have been identified.

The presence of BART running below Broadway adjacent to this site also complicates the understanding of this release. It is assumed that fuel release up-gradient of BART would eventually be intercepted by the subsurface walls of BART. It is not known what amount of the release is diverted and what amount proceeds around or beneath the BART tunnel. This uncertainty tends to lessen the likelihood that former service stations on the east side of the BART tunnel could be the source of free product or elevated gasoline found in wells on the west side.

The extent of remediation so far has been the over-purging of wells S-5 and S-6 since 1993 and 1997, respectively. A grand total of 6737 gallons has been removed from these wells up to February 2001. Although the amount of free product has been reduced, gasoline and BTEX concentrations remain elevated, with no indication of declining.

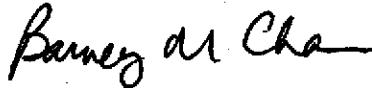
Ms. Karen Petryna
StID # 4254
461 8th St., Oakland CA 94607
April 11, 2001
Page 2

At this time, our office requests additional site investigation and characterization. This should include such things as presenting cross-sectional diagrams, interpretation of utilities including the BART tunnel and their potential to convey contamination, performing a sensitive receptor survey and providing a work plan to delineate the extent of the petroleum plume.

Please submit a work plan for these items within 30 days or no later than May 14, 2001.

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. T. Buggle, Cambria Environmental, 1144 65th St., Suite B, Oakland CA 94608
Rory Campbell, Law Offices, 333 Market St., Suite 2300, San Francisco, CA 94104-2173
Wells Fargo Bank National Association, Tr., c/o Pacific Property, 364 Bush St., San Francisco,
CA 94104-2805

R. Casteel & Co., P.O. Box 6839, Moraga, CA 94570

461 8th St

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



12-29-00

20343

December 28, 2000

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

Ms. Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91510-7869
STID 4254

RE: Former Shell Station, 461 8th Street, Oakland, CA 94607

Dear Ms. Petryna:

A letter from my office dated November 15, 2000 was sent to you requesting information concerning the above site. I requested the information be sent to me by December 8, 2000. As of this date, I have not received this information. Please submit this information to this office within 10 days of the receipt of this letter.

As previously mentioned in earlier letter, I have been transferred to another position within my Department and will begin my duties there on a full-time basis on January 2001. The new caseworker for this site is Mr. Barney Chan.

If you have any questions, please contact me at (510) 567-6774, or Mr. Chan at (510) 567-6765.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Enclosure (1) Letter dated November 15, 2000 addressed to Karen Petryna

Cc: Barney Chan, Alameda County Environmental Health
Leah Goldberg, Hanson Bridgett, 333 Market Street, Suite 2300,
San Francisco, CA 94105
Troy Buggle, Cambria, 1144 65th Street, Suite B, Oakland, CA 94608
Leroy Griffin, City of Oakland Fire Services, 1605 Martin Luther King,
Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



11-16-00

R0343

November 15, 2000

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

Ms. Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91510-7869
STID 4254

RE: Former Shell Station, 461 8th Street, Oakland, CA 94607

Dear Ms. Petryna:

I have reviewed the site file for the above address with Ms. Leah Goldberg, counsel for the present property owner. During the file review, I could not locate documents that address the following questions:

- 1) What is the status of the original monitoring wells S-1, S-2 and S-3? If they are closed, how and when were they closed?
- 2) Were the underground storage tanks and the associated piping removed from the site?
- 3) Were any soil or groundwater samples taken during the tank removal? Were the samples analyzed by a State certified laboratory? Please provide me with copies of any laboratory results.
- 4) When were monitoring wells S-4, S-5 and S-6 installed? Please submit a copy of the well logs and monitoring well construction design to this office.
- 5) Are all the monitoring wells screened at the same depths?
- 6) Has a conduit survey been performed for this site?

Please address these concerns by December 8, 2000. This information will assist this office in ascertaining whether the contamination detected in monitoring well S-5 and S-6 is from the former Shell station. It appears from the map that Shell provided me of possible sites that maybe source of the contamination detected in well S-5 and S-6, the sites are cross-gradient with the Shell station. Do you have any knowledge of any upgradient site from the Shell station that maybe a potential source?

This site will be eligible for site closure pending either (1) cleanup of the contamination in wells S-5 and S-6; or (2) sufficient information identifying another source of the contamination in S-5 and S-6, in the event that it is not coming form the former Shell Station.

Ms. Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91510-7869
November 15, 2000
Page 2 of 2

I have been transferred to another position within my Department and will begin my duties there on a full-time basis on January 1, 2001. Please contact Tom Peacock at (510) 567-6782 in January 2001 to identify the new caseworker for this project.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leah Goldberg, Hanson Bridgett, 333 Market Street, Suite 2300,
San Francisco, CA 94105
Troy Buggle, Cambria. 1144 65th Street, Suite B, Oakland, CA 94608
Leroy Griffin, City of Oakland Fire Services, 1605 Martin Luther King,
Oakland, CA 94612

Files

SENT 7-18-2000

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

20343

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

July 17, 2000

Ms. Karen Petryna, P.E.
Equilon Enterprises LLC
PO Box 6249
Carson, CA 90749-6249
STID 4254

RE: Former Shell Station, 461 8th Street, Oakland, CA 94607

Dear Ms. Petryna:

I have reviewed the Second Quarter 2000 Monitoring Report dated July 7, 2000 that was prepared by Cambria Environmental Technology. MTBE was detected in groundwater samples collected on April 11, 2000 from S-6 and S-8 at concentrations of 621 ppb and 21.4 ppb respectively. In the past, MTBE was detected in groundwater samples collected from monitoring wells S-5, S-9 and S-10. To assist us in our endeavor to determine whether the gasoline detected in downgradient wells S-5 and S-6 is from a recent release, commencing the next monitoring event groundwater samples containing MTBE should be confirmed using EPA Method 8260.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

Cc: Troy Buggle, Cambria, 1144 65th Street, Suite B, Oakland, CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 11-17-99
Including cc's

PO343

November 16, 1999

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9432

Ms. Karen Petryna, P.E.
Equilon Enterprises LLC
P.O. Box 6249
Carson CA 90749-6249
STID 4254

RE: Former Shell Station, 461 8th Street, Oakland, CA

Dear Ms. Petryna:

This letter is to confirm that I received the following documents from Cambria Environmental:

- 1) Site map identifying location of former underground storage tanks, and assumed locations of the former service islands and product lines
- 2) Site map identifying location of 9 (nine) soil borings and their analytical results
- 3) Technical data, Groundwater Technology, Inc. dated 10-19-81
- 4) Considerations on Infiltration of Gasoline into BART K E Line, Groundwater Technology, Inc., no date
- 5) Brief History, Shell Oil Company, 7th & Broadway, Oakland, 1/9/89
- 6) BART RECOVERY PROJECT LOG, Shell Oil Co., East Bay District
- 7) Phase I Preliminary Site Assessment, GeoStrategies Inc., June 30, 1993
- 8) Site Investigation, Enviros, August 16, 1994
- 9) Site Investigation Report and Quarterly Monitoring Report – First Quarter 1995, 2-14-95
- 10) Off-Site Source Investigation, Enviros, 8-12-96

I have reviewed these reports, and the source of the hydrocarbons currently detected in the groundwater samples from downgradient monitoring wells S-5 and S-6 is not apparent. The information available to this office concerning the investigation and remediation efforts subsequent to the pipeline failure at the subject site that resulted with gasoline leaking into the BART line in 1979 is incomplete.

In accordance to Title 23, California Code of Regulations, Article 11, A Soil and Water Investigation must be implemented to define the extent of soil and groundwater contamination. This workplan must be prepared by a State of California-Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, City of Oakland Fire Services, 1603 Martin Luther King, Oakland,
CA 94612
Troy Buggle, Cambria Environmental, 1144 65th Street, Suite B, Oakland,
CA 94608
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 10-19-99
including cc's

00343

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

Certified Mailer

October 18, 1999

Ms. Karen Petryna, P.E.
Equilon Enterprises LLC
P.O. Box 6249
Carson, CA 90749-6249

RE: Former Shell Station, 461-8th Street, Oakland, CA

Dear Ms. Petryna:

A letter addressed to you dated March 26, 1999 from this office request information concerning the underground tank removal at the above site. The letter asked that you forward the following information to my office:

- 1) Documentation of the removal of the underground tanks and associated piping
- 2) Analytical results of the soil and groundwater samples taken during the underground tank removal in 1980
- 3) Site map identifying the locations of the former underground tank, piping and dispenser islands
- 4) Copy of the manifests and receipts for the disposal of the underground tanks and associated piping
- 5) Documentation of the subsurface investigations(s) subsequent to the product line leak discovered in 1979 when the product pipeline leaked, and gasoline migrated into the BART tunnel near the intersection of 7th and Broadway.

As of this date, this information has not been received. Please forward this information to my office with 30 days of the receipt of this letter.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto

Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, 505-14th Street, 7th Floor, Oakland, CA 94612
Joe Neely, Cambria Environmental, 270 Perkins Street, P.O. Box 259,
Sonoma, CA 95476

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0# 343

March 26, 1999

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

Ms. Karen Petryna, P.E.
Equilon Enterprises LLC
P.O. Box 6249
Carson, CA 90749-6249
STID 4254

RE: Former Shell Station, 461-8th Street, Oakland, CA

Dear Ms. Petryna:

I have received your letter dated January 15, 1999. I contacted Chevron concerning their former station at 7th & Broadway. Monitoring well S-5, which has a history of containing floating product, is located upgradient from the former Chevron site. Monitoring well S-6 is located crossgradient and somewhat upgradient of the former Chevron site.

Methyl-Tert Butyl Ether (MTBE) has been detected in wells S-5 and S-6. This Chevron site, and the Former Flying A station at 629 Franklin street went out of business in the 1960's, before MTBE was added to gasoline. In addition, it does not appear hydrogeological possible for the hydrocarbon constituents and MTBE detected in monitoring wells S-5 and S-6 to be coming from the former Chevron and former Flying A sites.

Please forward to this office the following information:

- 1) Documentation of the removal of the underground tanks and associated piping
- 2) Analytical results of the soil and groundwater samples taken during the underground tank removal in 1980
- 3) Site map identifying the locations of the former underground tank, piping and dispenser islands
- 4) Copy of the manifests and receipts for the disposal of the underground tanks and associated piping
- 5) Documentation of the subsurface investigation(s) subsequent to the product line leak discovered in 1979 when the product pipeline leaked, and gasoline migrated into the BART tunnel near the intersection of 7th and Broadway.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto

Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, 505-14th Street, 7th Floor, Oakland, CA 94612
Joe Neely, Cambria Environmental, 270 Perkins Street, PO Box 259,
Sonoma, CA 95476

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20343

ENVIRONMENTAL HEALTH SERVICES

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

December 3, 1998

Ms. Karen Petryna, P.E.
Equilon Enterprises LLC
P.O. Box 6249
Carson CA 90749-6249
STID 4254

RE: Former Shell Station, 461-8th Street, Oakland, CA

Dear Ms. Petryna:

I have reviewed the semi-annual Monitoring Report – Third Quarter 1998, dated August 31, 1998 that was prepared by Cambria Environmental. Benzene concentrations increased from 14,000 to 26,000 ppb and 790 to 1,800 ppb in monitoring wells S-6 and S-8 respectively from the previous sampling event. Monitoring well S-5 has a history of containing separate phase hydrocarbons. Commencing the First Quarter 1999, sampling of monitoring wells S-5, S-6, and S-8 should be performed on a quarterly basis.

The extent of the groundwater plume at the above site has not been delineated. The groundwater sample taken from well S-6 in July 1998, the further downgradient well contained 26,000 ppb of benzene.

In accordance to Title 23, California Code of Regulations, Article 11, A Soil and Water Investigation must be implemented to define the extent of soil and groundwater contamination. This workplan must be prepared by a State of California-Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer. Please submit a soil and groundwater investigation workplan for the above site within 45 of the receipt of this letter.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, City of Oakland Fire Department
Leah Goldberg, Hanson & Bridgett Law Firm, 333 Market Street, Suite 2300,
San Francisco, CA 94105

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



20343

December 3, 1998

Ms. Karen Petryna, P.E.
Equilon Enterprises LLC
P.O. Box 6249
Carson CA 90749-6249
STID 4254

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

RE: Former Shell Station, 461-8th Street, Oakland, CA

Dear Ms. Petryna:

I have reviewed the semi-annual Monitoring Report – Third Quarter 1998, dated August 31, 1998 that was prepared by Cambria Environmental. Benzene concentrations increased from 14,000 to 26,000 ppb and 790 to 1,800 ppb in monitoring wells S-6 and S-8 respectively from the previous sampling event. Monitoring well S-5 has a history of containing separate phase hydrocarbons. Commencing the First Quarter 1999, sampling of monitoring wells S-5, S-6, and S-8 should be performed on a quarterly basis.

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If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Leroy Griffin, City of Oakland Fire Department
Leah Goldberg, Hanson & Bridgett Law Firm, 333 Market Street, Suite 2300,
San Francisco, CA 94105

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0343

October 6, 1994
STID 4254

Wells Fargo Bank
PO Box 63939
San Francisco CA 94163
ATTN: Steve Schulman

Shell Oil Co.
PO Box 5278
Concord CA 94520-9998
ATTN: Lynn Walker

RE: Former Shell Station, 461-8th St., Oakland CA 94607

Dear Mr. Schulman and Mr. Walker,

I am in receipt of the 10/4/94 Quarterly Monitoring Report and the 10/3/94 Work Plan, both prepared by enviros. As you probably know, the Work Plan involves the drilling of three onsite groundwater monitoring wells. This workplan is acceptable for implementation, on the condition that soils will be sampled and analyzed from the capillary fringe in each boring.

Please notify me at least 2 business days in advance of field activities, so that I may be present if possible. If you have any questions, please contact me at 510-567-6700, ext 6761. This is our new permanent phone number; our new fax number is 510-337-9335. Feel free to submit reports on double-sided paper in order to save precious trees. You need not copy the RWQCB any longer.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
Diane Lundquist, Enviros, Inc., 19411 riverside Dr., PO Box
259, Sonoma CA 95476-0259
Ed Howell/file

je 4254-B

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0343

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

June 6, 1994
STID 4254

Wells Fargo Bank
PO Box 63939
San Francisco CA 94163
ATTN: Steve Schulman

Shell Oil Co.
PO Box 5278
Concord CA 94520-9998
ATTN: Lynn Walker

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

RE: Former Shell Station, 461-8th St., Oakland CA 94607

Dear Mr. Schulman and Mr. Walker,

I am in receipt of a letter from Lynn Walker, dated 6/2/94. This letter summarizes the site history as reflected in Shell's records. I am also in receipt of a letter from Mr. Walker to Mr. Schulman, dated 4/25/94, regarding the disputed right of entry agreement. Attached to this letter is a copy of the agreement with Mr. Walker's suggested revisions.

I have had several conversations with Mr. Walker regarding the status of the 11/2/93 "Workplan for Soil and Groundwater Sampling," by enviros. It is my understanding that the right of entry issue has not been settled due to disputed insurance requirements.

In the meantime, free product continues to be detected in at least one well (S-5), located offsite and downgradient. Well S-5 has contained free product on and off since 1989. It is possible that well S-5 is located inside a larger plume of groundwater contamination. In order to determine the source of this problem, the onsite soil and groundwater investigation proposed by Shell must be implemented.

Title 23 of the California Code of Regulations (CCR), Division 3, Chapter 16, Articles 5 and 11 mandate site characterization (Sect. 2652, 2654, 2724, 2725), quarterly reporting (Sect. 2652), and abatement actions (Sec. 2653, 2655, 2722).

Therefore, you are required to come to an agreement to implement the workplan herein mentioned within 30 days, or by July 6, 1994. This means that the field work must be completed by July 6, 1994. A report documenting field activities and laboratory findings must be submitted to this office within 45 days of completion of field activities, or by August 21, 1994.

June 6, 1994
STID 4254
ATTN: Steve Schulman
ATTN: Lynn Walker
page 2 of 2

Please be advised that "no person shall close an underground tank system unless that person . . . demonstrates to the appropriate agency . . . that the site has been investigated to determine if there are any present, or were past releases, and if so, that appropriate corrective or remedial actions have been taken," as per Section 25298 (c) (4) of the California Health & Safety Code, (CH&SC) Division 20, Chapter 6.7. Further, "any operator of an underground tank system shall be liable for a civil penalty of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5,000) for each underground storage tank for each day of violation for. . . failure to properly close an underground tank system," as per Section 25299 (a) (5) of CH&SC, Division 20, Chapter 6.7.

As per the Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304, dated June 1992, from the State Water Resources Control Board Resolution No. 92-49, "the Regional Water Board has the authority to require uncooperative landowners and tenants of property affected by the discharge to cooperate or, if necessary, to participate in investigation, cleanup, and abatement."

Please notify me at least 3 business days in advance of field activities, so that I may be present if possible.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
Diane Lundquist, Enviros, Inc., 19411 riverside Dr., PO Box
259, Sonoma CA 95476-0259
Ed Howell/file

je 4254-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0343

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 5, 1994
STID 4254

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

Attn: Steve Schulman
Wells Fargo Bank TREO
PO Box 63939
San Francisco CA 94163

Attn: Lyn Walker
Shell Oil Co.
PO Box 5278
Concord CA 94520-9998

RE: former Shell station, 461-8th St., Oakland CA 94607

Dear Mr. Schulman and Mr. Walker,

We are in receipt of the 11/2/93 Work Plan, prepared by enviros, for the above referenced site. As you know, this workplan involves the installation of several soil borings to determine the presence of onsite soil and groundwater contamination. This workplan is acceptable on the following conditions:

- 1) Not one, but two borings will be located in the former fuel UST area.
- 2) Since it is likely that any gasoline contamination would be weathered, TPH-diesel will be added to the sampling matrix.
- 3) At least 2 soil samples will be analyzed per boring.

These conditions were discussed and agreed to between myself and Diane Lundquist of enviros today.

Please note that with the exception of closure reports, routine reports and documents no longer need to be copied to the Regional Water Quality Control Board. Kindly submit a cover letter with your consultant's reports. If you have any questions, please contact me at 510-271-4530. Please notify me at least 2 business days in advance of field activities so that I may arrange to be onsite.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Diane Lundquist, Enviros, Inc., 19411 Riverside Dr., PO Box
259, Sonoma CA 95476-0259
Ed Howell/file (je)