

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



76-2B-02

October 22, 2002

RO 372

Ms. Karen Petryna
Shell Oil Products US
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 Station, 15275 Washington Avenue, San Leandro - Request for Total Fuel Oxygenate Analyses

Dear Ms. Petryna:

The case file for the referenced site was recently reviewed, up to and including the September 2002 Cambria Environmental Technology third quarter 2002 monitoring report. This review was primarily conducted to identify the current suite of target compounds sought in water samples collected from the various wells within the network. Our review revealed that a number of potential fuel oxygenates may not have been sought historically from samples collected from these wells.

Please direct your consultant to analyze all samples collected during the next scheduled sampling event for the presence of total fuel oxygenates (MtBE, TAME, EtBE, DIPE, and TBA) and lead scavengers (EDB and 1,2-DCA / EDC) using EPA Method 8260. Such expanded analyses may be required to continue depending upon what is found.

In addition, you are reminded that all reports for this case, *as well as all other Shell Oil Products US cases*, are to be submitted under Shell Oil Products US cover that is signed, under penalty of perjury, by the official Shell Oil Products US project representative.

Please contact me at (510) 567-6783 should you have any questions.

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Jacquelyn Jones, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



02-03-01

20372

February 9, 2001

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

STID 1507

Ms. Karen Petryna
Equiva Services LLC
Science & Engineering, West Coast
P.O. Box 7869
Burbank, CA 91501-7869

RE: (Former) Shell Service Station, 15275 Washington Avenue, San Leandro

Dear Ms. Petryna:

Thank you for our receipt of the November 8, 2000 Cambria letter report sent in response to the October 5, 2000 correspondence from this office regarding the operation of the soil vapor extraction (SVE) system and well SR-1.

Cambria reports that their personnel visited the site on three occasions in October 2000 to restart and troubleshoot the SVE system. Cambria indicates the system would not remain running. The cause of this problem was not determined. Cambria also presents the results of influent concentration analyses for a vapor sample collected during their final site visit in October. This sample appears to confirm an earlier assertion of low influent concentrations. In addition, reported benzene concentrations were <0.0314 ppmv (<0.1 ug/l), the laboratory reporting limit for this analyte.

Cambria also presents an argument for not restoring the function of well SR-1. Cambria offers that nearby wells S-3, -5, and -7 should provide adequate coverage in vicinity of SR-1. This is a reasonable perspective provided the noted wells, in addition to well S-8, remain accessible during each scheduled sampling and/or monitoring event. Please be aware that upon closure of this case, well SR-1 must be properly destroyed under permit from Alameda County Public Works Agency.

Operation of the SVE system is not required at this time pending reevaluation of potential human health risks.

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Ms. Karen Petryna
Re: 15275 Washington Ave., San Leandro
February 9, 2001
Page 2 of 2

cc: Chuck Headlee, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Darren Croteau, Cambria Env. Technology, 1144 65th St., Ste. B, Oakland, CA 94608
Jonathan Redding, Fitzgerald, Abbot & Beardsley LLP, 1221 Broadway, 21st Floor,
Oakland, CA 94612
Richard Waxman, Wendell, Rosen, Black & Dean, P.O. Box 2047,
Oakland, CA 94604-2047
John Verber, Larson & Burnham, 1901 Harrison St., Oakland, CA 94604

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



10-6-00

RO # 372

October 5, 2000

STID 1507

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
Science & Engineering, West Coast
P.O. Box 7869
Burbank, CA 91501-7869

RE: (Former) Shell Service Station, 15275 Washington Avenue, San Leandro

Dear Ms. Petryna:

I have completed a recent evaluation of this case in order to determine its current status with respect to the operation of the soil vapor extraction (SVE) system. The four latest Cambria Environmental Technology, Inc. (Cambria) reports, dated February 28, March 29, September 1, and September 22, 2000, were reviewed to determine SVE operation during the 4th quarter of 1999, and the 1st, 2nd, and 3rd quarters of 2000.

It appears that the SVE system has not been in operation since August 1999.

Cambria states in their 4th quarter 1999 report that intermittent shut downs of the SVE system have resulted in poor run-time efficiencies. Consequently, the SVE system was reportedly not operated during the 4th quarter 1999 due to a reported decrease in influent concentrations. The report goes on to indicate "...[t]he system was pulsed on October 7, 1999, and influent and effluent samples were collected. However, the samples were not picked up by Sequoia Laboratories, therefore, lab data for the October 7, 1999 sampling event is not available". Cambria indicates that the system will be restarted in April or May 2000 to confirm low influent concentrations.

Cambria's 1st quarter 2000 report states "...[s]ince influent concentrations have decreased, the system was not operated during the first quarter of 2000". No mention of the October 7, 1999 influent and effluent sample analyses is made, nor are the laboratory results for such provided. Cambria informs that they will troubleshoot the intermittent shut downs of the SVE system during the second quarter of 2000, and reiterates that the system will be restarted in April or May of 2000.

Cambria's 2nd quarter 2000 report indicates that the system was not operated during that quarter. No mention is made of previous plans to restart the system in April or May and troubleshoot the reported problems. However, the report now states that "...[t]he SVE system will remain off due to low influent concentrations". As before, no laboratory data are provided to support this determination.

Ms. Petryna
Re: 15275 Washington Ave., San Leandro
October 5, 2000
Page 2 of 2

Cambria's 3rd quarter 2000 report essentially restates, with respect to the status of the SVE system, the conclusions of the previous report. Although attached to this report are graphical representations of reported SVE influent and effluent concentrations over the operative life of the system, the October 1999 data do not appear to be represented. In the absence of documentation supporting the expenditure of resources to "troubleshoot" the system, it appears that the earlier proposals to do so have never been fulfilled.

At this time Equilon is directed to reinstate the operation of SVE system before the onset of the rainy season in order to evaluate its efficacy as a viable remediation alternative at this site.

Upon receipt of several quarters of laboratory data, be it from continuous or pulsed operation of the SVE system, a determination can be made with consultation with this office whether or not it is appropriate to shut down the system. Such concurrence was not sought from this office previously.

In addition, Cambria has also reported that well SR-1 has had an "obstruction" first noticed approximately 6 months ago. Cambria reports that this obstruction appears to be sand that fills the well casing up to ~ 1.5' from grade. No explanation for the presence of this sand had been provided, nor has there been any apparent effort to remedy the problem.

Please submit your plans to salvage well SR-1 to regain full use of it as a sampling and monitoring point prior to the next scheduled sampling and monitoring event.

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Tom Peacock, ACDEH
Chuck Headlee, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Jonathan Redding, Fitzgerald, Abbot & Beardsley LLP, 1221 Broadway, 21st Floor,
Oakland, CA 94612
Richard Waxman, Wendell, Rosen, Black & Dean, P.O. Box 2047,
Oakland, CA 94604-2047
John Verber, Larson & Burnham, 1901 Harrison St., Oakland, CA 94604

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ROSN

May 4, 1999

STID 1507

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
Equiva Services LLC
Science & Engineering, West Coast
P.O. Box 6249
Carson, CA 90749-6249

RE: (Former) Shell Service Station, 15275 Washington Avenue, San Leandro

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Ms. Petryna:

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

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

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

LANDOWNER NOTIFICATION

Re: 15275 Washington Ave., San Leandro

May 4, 1999

Page 2 of 2

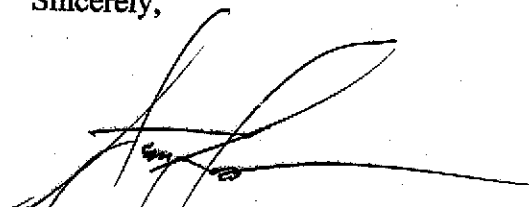
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

Please call me at (510) 567-6783 should you have any questions about the content of this letter.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#372

April 14, 1998

STID 1507

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

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

RE: (FORMER) SHELL SERVICE STATION, 15275 WASHINGTON AVENUE,
SAN LEANDRO - WELL INSTALLATION WORK PLAN

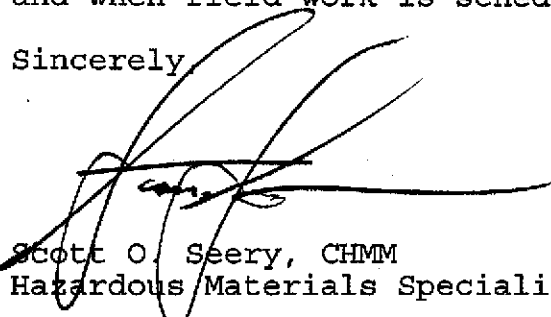
Dear Mr. Perez:

I have reviewed the April 13, 1998 Cambria Environmental Technology, Inc. (Cambria) *Monitoring Well Installation Work Plan*, transmitted the same date via facsimile. The work plan calls for the installation of an additional ground water monitoring well at the adjoining mobil home park, located west of the site. The new well will be constructed adjacent to former soil vapor sample location SG-5.

The cited Cambria work plan is accepted as submitted.

Please call me at (510) 567-6783 should you have any questions and when field work is scheduled to begin.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director
Chuck Hedley, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Diane Lundquist, Cambria Environmental Technology, Inc.
P.O. Box 259, Sonoma, CA 94576-0259
Jonathan Redding, Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, CA 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO# 372

January 12, 1998

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 350
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

STID 1507

Mr. Alex Perez
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: (FORMER) SHELL SERVICE STATION, 15275 WASHINGTON AVENUE,
SAN LEANDRO - CORRECTIVE ACTION PLAN

Dear Mr. Perez:

I have completed a review of the case file for this site with respect to implementation of the pending corrective action plan (CAP). Such review included, among other documents, the June 23, 1997 Weiss Associates (WA) document entitled "Vadose Zone Characterization Report and Tier 2 Risk-Based Corrective Action Evaluation," the August 13, 1997 Enviros, Inc. Site Investigation Report, and June 24, 1997 Enviros, Inc. Corrective Action Plan.

This office accepts, with conditions, the June 24, 1997 Enviros CAP recommendation to use soil vapor extraction (SVE) as a means to 1) mitigate theoretical benzene inhalation risks of occupants of the former station building, and 2) reduce overall benzene concentrations in soil gas and, therefore, benzene mass underlying the southern portion of the site. The proposed SVE CAP includes the installation of one additional SVE well, SV-1.

This acceptance is conditioned upon:

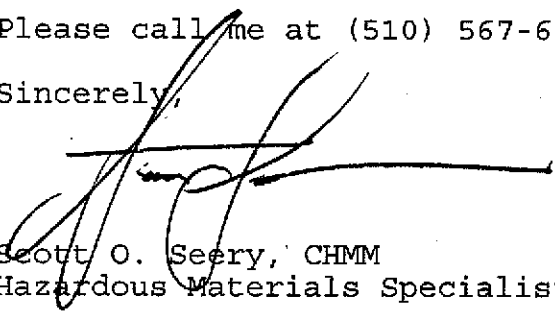
- 1) Regular system performance monitoring to, among other elements, determine the efficacy of the pre-existing ground water monitoring wells (S-1, -3, -5, -7, and -8) as vapor extraction points;
- 2) Should the performance of the proposed SVE system not meet expectations, evaluate the use of and, where appropriate, install supplemental system components - e.g., "passive" air inlet wells, air injection, ground water depression pumps, and/or additional horizontal well galleries; and,
- 3) The installation of, at a minimum, one additional ground water monitoring well within the adjoining mobil home park in proximity to soil boring SG-5 (Note: Benzene was identified previously at a concentration of 20,000 ug/m³ in soil gas collected at 4' depth).

Mr. Perez
RE: 15275 Washington Ave., San Leandro
January 12, 1998
Page 2 of 2

I understand that final system design, which includes selection of the initial airstream abatement equipment (e.g., thermal oxidation, carbon absorption, etc.), will be completed upon receipt of this acceptance letter. Therefore, please submit your final system design within 90 days of the date of this letter. You may include your well installation work plan at that time.

Please call me at (510) 567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director
Stephen Hill, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Diane Lundquist, Cambria Environmental Technology, Inc.
P.O. Box 259, Sonoma, CA 94576-0259
Brad Boschetto, Shell Oil Products Company
P.O. Box 25370, Santa Ana, CA 92799
Jonathan Redding, Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, CA 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#372

July 23, 1997

STID 1507

Mr. Alex Perez
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

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

RE: (FORMER) SHELL SERVICE STATION, 15275 WASHINGTON AVENUE,
SAN LEANDRO - ADDITIONAL ASSESSMENT WORK PLAN

Dear Mr. Perez:

I have completed review of the July 22, 1997 Enviros, Inc. letter work plan entitled "Response to ACHCSA Correspondence dated July 17, 1997." The cited Enviros document proposes a limited soil boring and soil vapor survey (SVS) in the northern portion of the site to augment that recently completed elsewhere about the site by others.

The scope of the cited Enviros work plan has been accepted with the following changes:

- 1) The locations of soil borings and SVS points have been modified to reflect expected potential receptor locations (SEE attached map and photograph).
- 2) One additional soil boring/SVS point has been added to provide additional coverage.

Please contact me at (510) 567-6783 when field work has been scheduled to begin.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

attachment

cc: Mee Ling Tung, Director
Kevin Graves, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Steve Long, Weiss Associates
Diane Lundquist, Enviros, Inc. (w/attachment)
Brad Boschetto, Shell Oil Products Company (w/attachment)
Jonathan Redding, Fitzgerald, Abbott & Beardsley (w/attachment)

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0#372

July 17, 1997

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

STID 1507

Mr. Alex Perez
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: (FORMER) SHELL SERVICE STATION, 15275 WASHINGTON AVENUE,
SAN LEANDRO - CORRECTIVE ACTION PLAN AND RESULTS OF RISK-
BASED CORRECTIVE ACTION EVALUATION

Dear Mr. Perez:

I have completed review of the June 23, 1997 Weiss Associates (WA) document entitled "*Vadose Zone Characterization Report and Tier 2 Risk-Based Corrective Action Evaluation*" and June 24, 1997 Enviros, Inc. *Corrective Action Plan*. The cited WA document reports the results of the recent soil vapor survey (SVS) and soil sampling field work at the site, and evaluates the theoretical risk to receptors at both the former Shell site and adjoining mobile home park. The cited Enviros document proposes corrective action intended to remediate latent fuel contamination at the site and mitigate the perceived risk.

The WA Tier 2 Risk-Based Corrective Action (RBCA) evaluation included the determination of site specific target levels (SSTL) for several potential exposure pathways based on concentrations of target compounds (e.g., benzene, etc.) in soil, soil vapor, and ground water media. The result of this evaluation is:

- o Benzene concentrations exceed calculated SSTLs for volatilization to indoor air from soil and ground water source media at the *residential* 1E-5 target risk level.
- o Benzene levels in ground water exceed the SSTLs and maximum contaminant levels (MCL) for drinking water.

As you are aware, the *residential* exposure scenario was chosen to reflect the presence of the mobile home park adjacent to the former Shell site, and to accommodate uncertainties with respect to future land use of the contiguous property as a whole. The drinking water determination appears strictly academic, however, due to the reported absence of drinking water wells near the site, because affected ground water is present at shallow (<10 foot) depth, and the fact that homes and businesses in this area of San Leandro are connected to municipal supplies.

Mr. Perez
RE: 15275 Washington Ave., San Leandro
July 17, 1997
Page 2 of 3

Enviros, in turn, evaluated site geology, historical site assessment data, and the results of the Tier 2 RECA evaluation in development of their proposed corrective action plan (CAP). Enviros has proposed the use of soil vapor extraction (SVE) as a means to mitigate potential exposure risk to occupants of the former station building and reduce benzene soil concentrations through use of several existing wells at the site, the installation of a dedicated SVE well, and installation of an array of horizontal "wells" around the perimeter of the station building. Extracted vapors would be treated by a suitable method housed in an above-ground treatment enclosure. In order to ensure SVE's ultimate effectiveness at this site, Enviros indicates a SVE test will be performed to aid final system design.

This office concurs that SVE may have potential as a suitable remediation and risk mitigation technology for this site, and that the SVE test should be performed. Therefore, approval to perform this test is hereby given. Approval for the final CAP will occur only upon favorable review of the SVE test and proposed system design.

On a related issue, recent SVS data from points SG-5 and SG-9, in addition to shallow soil analytical data from well S-16, indicate concentrations of both soil vapor and soil (S-16 @ 5') exceed SSTLs for benzene. These data, consequently, warrant the performance of a limited SVS/soil sampling program in the northern portion of the site to:

- o Identify >SSTL benzene concentrations and potential receptors
- o Identify and delineate potential vapor pathways (e.g., coarse-grained fill materials, etc.)
- o Fully encompass all areas of the site which may require incorporation into the final CAP scope

Therefore, this office requests the submittal of a brief scope-of-work for this additional assessment task. As time is of the essence due to pending lease negotiations at the site, please submit this plan as soon as possible so that the field work associated with this project may occur concurrently with the SVE tests and final system design.

Mr. Perez
RE: 15275 Washington Ave., San Leandro
July 17, 1997
Page 3 of 3

Please call me at (510) 567-6783 should you have any questions. Incidentally, I will be away from the office between July 24 and July 30, 1997. However, I will make time to review any submittals which may arrive by Tuesday, July 22nd.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Mee Ling Tung, Director
Kevin Graves, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Steve Long, Weiss Associates, 5500 Shellmound Street
Emeryville, CA 94608-2411
Diane Lundquist, Enviros, Inc.
P.O. Box 259, Sonoma, CA 94576-0259
Brad Boschetto, Shell Oil Products Company
P.O. Box 25370, Santa Ana, CA 92799
Jonathan Redding, Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, CA 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Ro# 372

April 30, 1997

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

(510) 337-9335 (FAX)

STID 1507

Mr. Alex Perez
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: (FORMER) SHELL SERVICE STATION, 15275 WASHINGTON AVENUE,
SAN LEANDRO - WORK PLAN FOR RISK-BASED CORRECTIVE ACTION /
SOIL VAPOR SURVEY

Dear Mr. Perez:

I have completed review of the April 21, 1997 Weiss Associates (WA) work plan describing steps to collect soil gas, ambient outdoor air, and soil core samples from and adjacent to the subject site. This work plan is a revision of the previous WA work plan dated August 20, 1997, reflecting changes discussed during our meeting on April 10, 1997.

I understand that the collection of data in the fashion proposed is necessary to complete the pending Tier 2 Risk-Based Corrective Action (RBCA) evaluation. I also understand that a second round of data collection will occur within 6 months to account for potential temporal variations at the site, and to corroborate the initial datasets. I further understand that the scope of the next round will be substantially based on the results of the initial work, and will also include an evaluation of potential preferential vapor pathways (e.g., utility conduits, etc.) that may affect subsurface vapor transport to receptor locations remote to site source areas.

The cited revised WA work plan has been accepted as submitted and as clarified above. I understand that field work is scheduled to begin May 5, 1997. Please call me at (510) 567-6783 should this schedule change.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

Mr. Perez
RE: 15275 Washington Ave., San Leandro
April 30, 1997
Page 2 of 2

cc: Mee Ling Tung, Director
Kevin Graves, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Steve Long, Weiss Associates, 5500 Shellmound Street
Emeryville, CA 94608-2411
Brad Boschetto, Shell Oil Products Company
P.O. Box 25370, Santa Ana, CA 92799
Jonathan Redding, Fitzgerald, Abbott & Beardsley
1221 Broadway, 21st Floor
Oakland, CA 94612

ALAMEDA COUNTY
HEALTH CARE SERVICES



R0#372

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 20, 1996

STID 1507

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

RE: (FORMER) SHELL SERVICE STATION, 15275 WASHINGTON AVENUE,
SAN LEANDRO - REQUEST FOR HUMAN HEALTH RISK-BASED
CORRECTIVE ACTION EVALUATION

Dear Mr. Granberry:

This letter is in follow-up to my telephone conversations last week with both you and Brad Boschetto of Shell Oil Products Company (Shell). Our conversations were regarding the need to evaluate possible human health risks due to exposure to latent fuel compounds in soil and ground water by receptors located both at the subject site and adjoining properties.

This subject was one topic of discussion at our meeting February 22, 1996 at Shell's Concord office with Mr. Kevin Graves of the California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), among others present. As you may recall, the consensus of the group that day was: 1) a risk evaluation was clearly needed for this case; 2) due to uncertainties associated with the future use of the former Shell station site and current adjoining property uses, residential exposure scenarios would be employed during the risk evaluation; and, 3) should, following this evaluation, it be concluded that a theoretical exposure risk exists, Shell would propose means of eliminating, reducing, or otherwise mitigating such risk.

Please submit a work plan which clearly describes the process Shell plans to follow during their evaluation of human health risk associated with the release at this site, including what additional information is needed, if any, and the means of acquiring it. This work plan is due within 90 days of the date of this letter.

Please contact me at 510/567-6783 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

Mr. Granberry
RE: 15275 Washington Ave., San Leandro
May 20, 1996
Page 2 of 2

cc: Mee Ling Tung, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Ravi Arulanantham, RWQCB
Kevin Graves, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Brad Boschetto, Shell Oil Products Company
P.O. Box 4848, Anaheim, CA 92803

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#372

ARNOLD PERKINS, DIRECTOR
RAFAT A. SHAHID, DEPUTY DIRECTOR

February 1, 1996

Alameda County Environmental Health Dept.
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510)567-6700 fax: (510)337-9335

STID 1507

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

RE: (FORMER) SHELL SERVICE STATION, 15275 WASHINGTON AVENUE,
SAN LEANDRO - REQUEST FOR HUMAN HEALTH RISK-BASED
CORRECTIVE ACTION ANALYSIS

Dear Mr. Granberry:

I have completed review of the November 29, 1995 Enviros, Inc. *Corrective Action Plan - Addendum* and supplemental reports submitted under shared cover. This addendum was submitted in response to a request for additional information following my review of the original Enviros *Corrective Action Plan (CAP)* dated April 17, 1995.

As we recently discussed, in response to the October 16, 1995 Lawrence Livermore National Laboratory (LLNL) report entitled "Recommendations to Improve the Cleanup Process for California's Leaking Underground Fuel Tanks (LUFTs)," the California State Water Quality Control Board (SWRCB) has requested that local agencies evaluate LUFT cases with respect to human and environmental risk, and rank them according to such risk (i.e., "low" vs. "high" risk). On January 5, 1996, supplemental instructions were issued by the San Francisco Bay Regional Water Quality Control Board (RWQCB) in order to assist those agencies responsible for oversight of LUFT sites in their determination of such risks, among other topics. We have been instructed to incorporate the methodologies described in the American Society of Testing and Materials (ASTM) standard for Risk Based Corrective Action (RBCA), ASTM E-1739-95, in this risk-evaluation process.

I have evaluated the subject case in context with this recent shift in the way LUFTs are now to be prioritized. I was assisted in the final stages of review by Dr. Ravi Arulanantham, Staff Toxicologist with the RWQCB. We have concluded that this site requires a human health risk-based analysis in order to determine how this site should be prioritized, and whether the Enviros CAP as amended provides adequate protection from potential exposure to nearby receptors.

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The determination for requiring further RBCA analysis is based on the following issues:

- o Residential property (mobil home park) lies *directly* adjacent to and hydraulically downgradient of the site, UST excavation, and western-most dispenser island area
- o Little or no documented source removal has occurred with respect to both the UST excavation and dispenser island areas
- o Previous environmental assessments indicate encountered sediments (SAND) were "saturated" with gasoline at approximately 5' below grade (BG) in borings S-3 and S-4, located adjacent to the western-most dispenser area; exploratory trenches excavated to evaluate the lateral extent of the release in the unsaturated zone indicate elevated levels of fuel compounds (e.g., 10 ppm benzene) in material encountered at shallow depth (< 10' BG) very proximal to the adjoining mobil home property, ~ 40' from the UST excavation, and beyond the apparent western limits of the western-most dispenser area
- o Boring logs for S-8 and S-9, located west of the western-most dispenser area and site in general, respectively, suggest fuel contaminants from the western-most dispenser area may be exploiting shallow fill materials which appear to trend towards the west, in the direction of and which underlie portions of the mobil home park
- o Both a previous soil vapor survey and on-going monitoring program have identified elevated concentrations of gasoline compounds in both soil gas and sampled ground water from sampling points located on the mobile home site, among others; historic high fuel compound concentrations have been identified in water sampled from wells SR-1, S-3, and S-5 located directly proximal to the adjacent mobil home park
- o Ground water depth is very shallow, historically ranging in depth between approximately 5 and 9' BG

Comparison of data accumulated during the course of the investigation with ASTM E-1739-95 Tier 1 risk-based screening level (RBSL) values for specific exposure scenarios indicates that, under certain scenarios, the RBSL values are exceeded. Under such circumstances, you must either: 1) determine site-specific target levels (SSTL) and appropriate points of

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compliance if you decide the Tier 1 RBSLs are not appropriate, typically based on an analysis of the cost of achieving Tier 1 RBSLs with the cost of a Tier 2 (or 3) analysis, considering the probability that the Tier 2 (or 3) site-specific goals will be significantly less costly to achieve than Tier 1 goals, or 2) perform the corrective action necessary to achieve Tier 1 RBSL values.

The benefit of moving to higher tiers is that it allows you to develop more cost-effective corrective action plans because the conservative assumptions of earlier tiers are replaced with more realistic site-specific information. Some additional assessment work may be needed, however, in order to determine site-specific parameters for evaluating plausible exposure scenarios and consequent risk to receptors.

I understand that you are planning to meet with staff of the RWQCB, tentatively scheduled for February 22, to discuss many of the Alameda County sites. I would suggest that this meeting may present a good opportunity to discuss, and even *brainstorm*, these issues in more detail so that, as a team, we can determine the best approach. Hence, unless you feel otherwise, I would be willing to wait until that time to finalize resolution to these issues.

Please call me at 510/567-6783 should you have any questions or would like to discuss this case.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Jun Makishima, Acting Director
Gil Jensen, Alameda County District Attorney's Office
DK Ravi Arulanantham, RWQCB
Kevin Graves, RWQCB
Mike Bakaldin, San Leandro Hazardous Materials Program
Dianne M. Lundquist, Enviros, Inc.
P.O. Box 259
Sonoma, CA 94576-0259

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0372

STID 1507

Alameda County CC4580
Environmental Protection Division
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577

February 16, 1995

Mr. Lynn Walker
Shell Oil Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL STATION, 15275 WASHINGTON AVENUE, SAN LEANDRO

Dear Mr. Walker:

I have completed a review of the case file for this site, up to and including the January 5, 1995 EMCON 4th quarter 1994 sampling report. The cited report proposes a reduction of sampling frequencies in a number of the wells in the multi-well network associated with this investigation. However, in the absence of a comprehensive corrective action plan (CAP) associated with this sampling frequency reduction, this proposal is denied at this time.

Data presented in the June 29, 1990 GeoStrategies, Inc. (GSI) aquifer test report indicates both "step (draw-) down" and "slug" tests were performed on the on-site recovery well (SR-1) and nine monitoring wells, respectively, during March 1990. GSI reports a wide range of K and T values and lack of linearity following their evaluation of these test data, a symptom of the heterogeneity and complexity of underlying sedimentary units.

GSI indicated their follow-up plan to use, what was termed as, the Shell Oil Company "Simulated Benzene Transport Model" to evaluate the effect of "natural attenuation" as a viable remediation alternative and element of a *remedial action plan*, or RAP. To date, no further mention of the RAP or benzene model evaluation has been presented.

At this time, pursuant to Section 2720 et seq. of Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations (CCR), please prepare and submit a CAP which presents an evaluation of the CAP elements required under this article. Certainly, intrinsic bioremediation/attenuation should be one of the evaluated alternatives.

The requested CAP is due within 60 days of the date of this letter, or by April 17, 1995.

Mr. Lynn Walker
RE: 15275 Washington Avenue, San Leandro
February 16, 1995
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Please call me at 510/567-6783 should there be any questions or if I may be of assistance.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office
Mike Bakaldin, San Leandro Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0372

December 26, 1991

DEPARTMENT OF ENVIRONMENTAL HEALTH (3)
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

Mr. Kurt Miller
Shell Oil Company
Environmental Engineering Division
P.O. Box 5278
Concord, CA 94520

RE: CAL-EPA REGIONAL HYDROGEOLOGY AND CONTAMINATION STUDY, CENTRAL
SAN LEANDRO

Dear Mr. Miller:

The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substance Control (DTSC), has been investigating the presence of several priority pollutants, primarily volatile organic compounds (VOC), heavy metals, and nitrates, in soil and ground water occurring in the central San Leandro area since approximately 1986. Currently, six sites are being investigated with Cal-EPA lead or oversight, as follows:

- o 139th Avenue site (Cal-EPA lead)
- o Factor Avenue site (Cal-EPA lead)
- o Singer-Friden site (Cal-EPA lead)
- o Caterpillar site (Cal-EPA oversight)
- o Hudson ICS (Cal-EPA oversight)
- o Staefa Control System Inc./2481 Washington Avenue (Cal-EPA oversight)

Because of similar contamination found at these sites, DTSC suspects that a larger, regional contamination problem exists that requires further investigation. Presently, DTSC is conducting a Regional Hydrology and Contamination Study in Central San Leandro. The purposes of this study include, among other elements:

- o defining as far as possible the known vertical and horizontal extent of contamination in the area;
- o identifying existing public and/or private wells that can be used by DTSC for monitoring purposes;
- o instituting coordinated sampling; and,
- o defining the hydrogeology of the area.

Mr. Miller
 RE: Cal-EPA VOC Study
 December 26, 1991
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The intent of the DTSC study is to develop the best possible data on the extent of contamination while realizing no unnecessary expenditure of public funds. Following the presentation of the study's final report, DTSC will develop a work plan for conducting further study, targeting potential source areas and "hot spots" identified during the course of this phase of the investigation.

The DTSC has requested Alameda County's assistance in developing this study and report by coordinating ground water sampling efforts for those sites under county lead. To meet this goal, you are requested, on a volunteer basis, to supplement the sampling slated to occur at your site(s), listed below, during January - March 1992, in addition to those sampling/monitoring activities already required, as follows:

- 1) Collect and analyze ground water samples from at least one well for VOCs (EPA Method 624, or 601/602). The well sampled for this task is to be chosen based upon its potential for detection of VOCs relative to other wells on-site, i.e., its proximity downgradient of a former waste oil or solvent underground storage tank, VOCs identified in prior analyses, etc.
- 2) Present this data, along with other requisite sampling/monitoring data, in the 1992 first quarter report. Submit a copy of this report directly to the DTSC, at the following address:

California Environmental Protection Agency
 Department of Toxic Substance Control
 700 Heinz Avenue, Suite 200
 Berkeley, CA 94710
 Attn: Eileen Hughes

The sites affected by this request are as follow:

(R0372) ° [REDACTED]

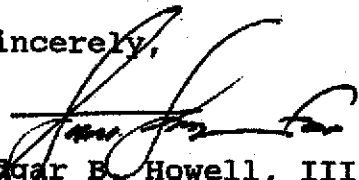
(R0156) ° [REDACTED]

(R0367) ° [REDACTED]

Mr. Miller
RE: Cal-EPA VOC study
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Thank you in advance for your cooperation in this matter. Please feel free to contact Mr. Scott Seery of this Division at 510/271-4320, or Ms. Eileen Hughes of DTSC at 510/540-3848, should you have any questions.

Sincerely,



Edgar B. Howell, III
Chief, Hazardous Materials Division

- cc: Rafat A. Shahid, Assistant Agency Director, Environmental Health
- Gil Jensen, Alameda County District Attorney's Office
- Lester Feldman, RWQCB
- Eileen Hughes, DTSC
- Mike Bakaldin, San Leandro Fire Department
- Jim Ferdinand, Eden Consolidated Fire District

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0372

Certified Mail #P 062 127 662

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

October 6, 1989

Mr. Ray Newsome
Senior District Engineer
Shell Oil
P.O. Box 4023
Concord, CA 94524

RE: Former Shell Station, 15275 Washington Ave., San Leandro

Dear Mr. Newsome:

We have received the quarterly monitoring report dated July 13, 1989, that was prepared by Geo Strategies, Inc., for the above site. We do not have a deposit/refund for the investigation/remediation at this site. Please send us a deposit/refund check for \$450.00, made payable to the County of Alameda, within ten (10) days of the receipt of this letter.

If you have any questions, please contact me at (415) 271-4320.

Sincerely,

Larry Seto, Sr. Hazardous
Materials Specialist

LS:mnc

cc: San Leandro Fire
RWQCB
Howard Hatayama
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Rafat A. Shahid, Assistant Agency Director, Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0372

Certified Mail # P 833 981 306

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

April 10, 1989

SHELL STATION
15275 WASHINGTON AVE.
SAN LEANDRO, CALIFORNIA 94577

DEAR MANAGERS:

Dames & Moore, an Environmental Consulting Co., located at 221 Main St., San Francisco, CA has requested information concerning all the environmental information we have on your site. In accordance to Section 25511(c), California Health & Safety Code, Division 20, we are notifying you of this request.

For your information, part of this section states, "The administrative agency shall release the information to the public, but not earlier than 30 days after the date of mailing the notice of the request for information, unless prior to the expiration of the 30 day period, the handler files an action in an appropriate court for a declaratory judgement that the information is subject to protection under subdivision (b) or for an injunction prohibiting disclosure of the information to the public and promptly notifies the administering agency of that action".

If our office does not receive any of these documents within 30 days, we will assume all the information we have on your company is not confidential.

If you have any questions, please contact Larry Seto, Senior Hazardous Materials Specialist, at 271-4320.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rafat A. Shahid'.

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:LS:mnc

cc: Larry Seto
Files