

R0415

Wickham, Jerry, Env. Health

To: Baertschi, Dennis**Subject:** RE: Report Extension Request -4411 Foothill, Oakland - Case #RO0000415

Dennis,

Based upon your request, the schedule for submittal of a report on the referenced soil vapor sampling is extended to March 14, 2008.

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: Baertschi, Dennis [mailto:dbaertschi@croworld.com]**Sent:** Tuesday, January 29, 2008 5:35 PM**To:** Wickham, Jerry, Env. Health**Subject:** Report Extension Request -4411 Foothill, Oakland - Case #RO0000415

Mr. Wickham –

Attached is (another) request for an extension for the report for the onsite soil vapor probes at the above site that was mailed to you today – please review this and let me know if this is acceptable w/ you –

Due to the delays caused by the frequent/recent rains, we were (finally) able to collect the soil vapor samples for this site on the 14th of Jan – because of this delay we will consequently now need a little additional time to receive, review & process the lab data into a report – thus are respectfully requesting additional time for this report to be submitted by March 14, 2008 -

Let me know if there are any questions -

Thanks

Dennis Baertschi**Conestoga-Rovers & Associates (CRA)**

408 7th Street, Suite A,

Eureka, CA 95501

Phone: 707.268.3813

Fax: 707.268.8180

Cell: 707.845.8552

1/30/2008

Wickham, Jerry, Env. Health

To: Baertschi, Dennis

Subject: RE: Report Extension Request -4411 Foothill, Oakland - Case #RO0000415

Dennis,

Your proposal regarding scheduling of work in the correspondence referenced below is generally acceptable. As previously approved, a report of findings for the soil vapor investigation (exclusive of V-8 and V-9) is to be submitted by February 16, 2008. We request that you submit a schedule for installation and reporting for on-site vapor probes V-8 and V-9 and off-site wells S-10, S-11, and S-12 by April 15, 2008.

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: Baertschi, Dennis [<mailto:dbaertschi@croworld.com>]

Sent: Thursday, January 03, 2008 3:43 PM

To: Wickham, Jerry, Env. Health

Subject: Report Extension Request -4411 Foothill, Oakland - Case #RO0000415

Importance: High

Mr. Wickham --

Attached is a request for an extension for the report for the installation of the offsite wells at the above site, that was mailed to you today -- please review this and let me know if this proposal and approach is acceptable w/ you

--

Let me know if there are any questions -

Thanks

Dennis Baertschi

Conestoga-Rovers & Associates (CRA)

408 7th Street, Suite A,

Eureka, CA 95501

Phone: 707.268.3813

Fax: 707.268.8180

Cell: 707.845.8552

dbaertschi@croworld.com

Conestoga-Rovers & Associates has acquired the former Cambria Environmental Technology

Visit us at www.croworld.com

1/3/2008

R0415

Wickham, Jerry, Env. Health

To: Baertschi, Dennis**Subject:** RE: Report Extension Request -4411 Foothill, Oakland - Case #RO0000415

Dennis,

Based upon your request, the schedule for submittal of the on-site investigation report referenced in your extension request correspondence is extended to February 16, 2008.

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: Baertschi, Dennis [mailto:dbaertschi@croworld.com]**Sent:** Friday, November 09, 2007 12:00 PM**To:** Wickham, Jerry, Env. Health**Subject:** Report Extension Request -4411 Foothill, Oakland - Case #RO0000415

Mr. Wickham –

Attached is a request for an extension for the report for the onsite soil vapor probes at the above site that was mailed to you today – please review this and let me know if this is acceptable w/ you –

Let me know if there are any questions -

Thanks

Dennis Baertschi**Conestoga-Rovers & Associates (CRA)**

408 7th Street, Suite A,

Eureka, CA 95501

Phone: 707.268.3813

Fax: 707.268.8180

Cell: 707.845.8552

dbaertschi@croworld.com

Conestoga-Rovers & Associates has acquired the former Cambria Environmental Technology

Visit us at www.croworld.com

11/9/2007



**CONESTOGA-ROVERS
& ASSOCIATES**

19449 Riverside Drive, Suite 230, Sonoma, California 95476
Telephone: 707-935-4850 Facsimile: 707-935-6649
www.CRAworld.com

November 9, 2007

Mr. Jerry Wickham
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: **Access Agreement Status and Request for Report Extension**
Former Shell Service Station
4411 Foothill Boulevard
Oakland, California
SAP Code 135686
Incident No. 98995746
Agency Case No. RO0000415

RECEIVED
NOV 13 2007
ENVIRONMENTAL HEALTH SERVICES

Dear Mr. Wickham:

Conestoga-Rovers & Associates (CRA) prepared this letter on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell) to request an extension for the submittal of the report(s) of findings associated with the July 27, 2007 *Soil Gas Survey and Groundwater Assessment Work Plan* for the above site, which proposed both onsite and offsite work.

In your work plan approval letter dated August 16, 2007, you requested that the report of findings for the soil vapor survey investigation be submitted by **November 17, 2007**, and the report of findings for the monitoring well installations be submitted by **January 8, 2008**.

As you are likely aware, the four proposed offsite wells (S-10, S-11, S-12 and S-13) and one of the proposed soil vapor probes (V-12) are located on two separate adjacent properties that are owned by two different parties. We have been negotiating access agreements with each of the respective property owners to secure right-of-entry agreements (ROE's) to allow us to perform the offsite work. To date, although indications are that the respective property owners will potentially agree to the ROE's, we are still addressing various issues and concerns they have, and have not yet secured the ROE signatures.

Our initial intent was to perform all the onsite and offsite work during one drilling mobilization to be more efficient with resources. However, when it became apparent that the delays in securing the ROE's was impacting the implementation of the proposed onsite work, we decided to implement the onsite work first, while we continue to negotiate securing the ROE's for the offsite work.

Equal
Employment
Opportunity Employer



**CONESTOGA-ROVERS
& ASSOCIATES**

Mr. Jerry Wickham
November 9, 2007

Because of recent reductions in available CRA field staff personnel and scheduling constraints with the drillers, the earliest drilling dates available to perform the onsite work is **December 13 and 14, 2007**, and the work to install the eleven onsite soil vapor probes (V-1 through V-11) has been scheduled for these days. Based on the date of scheduled field activities, we will need additional time to receive the lab reports and prepare the technical report. We respectfully request an extension for the submittal of the report for the on site soil vapor probes to no later than **February 16, 2008** (approximately 60 days following receipt of analytical data for the well installations).


We will continue our negotiations with the property owners for the installation of the offsite wells and the soil vapor probe, and will keep you apprised as to securing of the ROE's and the schedule of the associated field activities.

Please let me know as soon as possible if this request is acceptable with you.

CLOSING

If you have any questions regarding the letter, please call Dennis Baertschi at (707) 268-3813.

Sincerely,
Conestoga-Rovers & Associates

for 
Dennis Baertschi
Project Manager

cc: Denis Brown, Shell Oil Products US

RECEIVED
NOV 13 2007
ENVIRONMENTAL HEALTH SERVICES

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

August 16, 2007

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

Linli Lee
Foothill Blvd. LLC
141 Woodland Way
Piedmont, CA 94611-3839

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. RO0000415 and Geotracker Global ID T0600101065, 4411 Foothill Boulevard, Oakland, CA 94601

Dear Denis Brown, Linli Lee, J.T. and Elizabeth Watters, and Walter Watters:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted work plan entitled, "Soil Gas Survey and Groundwater Assessment Work Plan," dated July 27, 2007, prepared on your behalf by Conestoga-Rovers & Associates. The Work Plan proposes a scope of work that includes the installation and sampling of 12 soil vapor probes and 4 groundwater monitoring wells. The proposed scope of work is acceptable and may be implemented as proposed.

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

TECHNICAL REPORT REQUEST

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

- **November 19, 2007** – Soil Vapor Survey Report
- **January 8, 2008** – Monitoring Well Installation Report
- **45 days following end of each quarter** – Quarterly Monitoring Report

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

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
August 16, 2007
Page 2

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
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
August 16, 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, Conestoga-Rovers & Associates, 19449 Riverside Drive, Suite 230, Sonoma, CA 95476

Bill Phua c/o Jay Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260
Attention: H.K. Phares

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



F

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

May 18, 2007

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

Linli Lee
Foothill Blvd. LLC
141 Woodland Way
Piedmont, CA 94611-3839

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. RO0000415 and Geotracker Global ID T0600101065, 4411 Foothill Boulevard, Oakland, CA 94601

Dear Mr. Brown, Linli Lee, J.T. and Elizabeth Watters, and Walter Watters:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted report entitled, "Site Investigation and First Quarter 2007 Groundwater Monitoring Report," dated April 19, 2007, prepared on your behalf by Conestoga-Rovers Associates. The Site Investigation Report presents the results from installation, development, and sampling of four monitoring wells. These four monitoring wells were installed to replace five onsite monitoring wells that were destroyed in July 2005 to accommodate commercial site redevelopment. The concentrations of total petroleum hydrocarbons as gasoline (TPHg) and BTEX detected in the initial groundwater samples collected from three of the four newly installed monitoring wells are significantly higher than the concentrations detected in groundwater samples collected from the previous onsite monitoring wells. Further investigation of the elevated concentrations of fuel hydrocarbons in groundwater is required.

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

TECHNICAL COMMENTS

1. **Hydraulic Gradient.** The historic hydraulic gradient as measured using the five previous onsite monitoring wells was generally to the west to southwest. Based on water level measurements from the four recently installed monitoring wells, the apparent hydraulic gradient is to the east southeast. Please review the hydraulic gradient following the next groundwater gauging and sampling event and comment on the accuracy of the apparent hydraulic gradient and consistency with previous data.
2. **Potential Vapor Intrusion.** The concentrations of total petroleum hydrocarbons as gasoline and BTEX detected in three of the four initial groundwater samples collected on March 2, 2007 from the newly installed monitoring wells (S-6 through S-9) significantly exceeds the

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
May 18, 2007
Page 2

concentrations detected in groundwater samples collected in 2005 from the previous onsite monitoring wells. The concentrations of benzene detected in groundwater from three of the four new monitoring wells exceed Environmental Screening Levels (San Francisco Bay Regional Water Quality Control Board, February 2005) for potential vapor intrusion to indoor air due to volatilization from groundwater. Due to the elevated concentrations of BTEX detected in three of the four newly installed monitoring wells, we request that you conduct soil vapor sampling to investigate the potential for vapor intrusion to indoor air. Please present these plans in the Work Plan for Additional Site Characterization requested below.

3. **Off-Site Investigation.** Previously proposed off-site soil borings and monitoring wells were not completed due to site access issues. We request that you continue efforts to complete the off-site borings and wells. In addition, elevated concentrations of TPHg and benzene were detected in the grab groundwater sample collected from soil boring SB-12. Historic documents also describe contamination observed off-site from the 1958 release. We request that you investigate potential off-site impacts in the area of SB-12.
4. **Quarterly Groundwater Monitoring.** Quarterly groundwater monitoring is to be continued for the site. Please present the results in the monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- **July 27, 2007** – Work Plan for Additional Site Characterization
- **45 days following end of each quarter** – Quarterly Monitoring Report

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

ELECTRONIC SUBMITTAL OF REPORTS

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

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
May 18, 2007
Page 3

requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

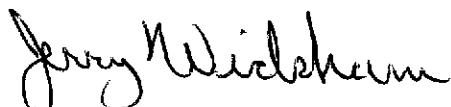
AGENCY OVERSIGHT

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.

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
May 18, 2007
Page 4

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., 270 Perkins Street, Sonoma, CA 95476

Bill Phua c/o Jay Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260
Attention: H.K. Phares

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

November 30, 2006

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

Linli Lee
Foothill Blvd. LLC
141 Woodland Way
Piedmont, CA 94611-3839

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. [REDACTED] Geotracker Global ID T0600101065, 4411 Foothill Boulevard, Oakland, CA – Schedule Extension

Dear Mr. Brown, Linli Lee, J.T. and Elizabeth Watters, and Walter Watters:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and your recent correspondence entitled, "Request for Extension," dated November 21, 2006, prepared on your behalf by Cambria Environmental Technology, Inc. Due to scheduling constraints for drilling the replacement monitoring wells, the November 21, 2006 correspondence requests a schedule extension for submittal of a monitoring well installation and sampling report from February 15, 2007 to April 19, 2007. The proposed schedule extension is acceptable.

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

TECHNICAL REPORT REQUEST

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

- **April 19, 2007** – Monitoring Well Installation and Sampling Report
- **45 days following end of each quarter** – Quarterly Monitoring Report

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

ELECTRONIC SUBMITTAL OF REPORTS

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

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
November 30, 2006
Page 2

longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
November 30, 2006
Page 3

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Dennis Baertschi, Cambria Environmental Technology, Inc., 270 Perkins Street, Sonoma,
CA 95476

Bill Phua c/o Jay Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260
Attention: H.K. Phares

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

RO415
not on file

C A M B R I A

2006 NOV 29 PM 1:41

November 21, 2006

Mr. Jerry Wickham
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California, 94502-6577

Re: **Request for Extension**
Former Shell Service Station
4411 Foothill Boulevard
Oakland, California
SAP Code 135686
Incident #98995746
Agency Site # RO0000415

Alameda County
NOV 29 2006
Environmental Health



Dear Mr. Wickham:

In your work plan approval letter dated August 14, 2006 for the above noted site, you have requested that the report of findings for the site investigation be submitted no later than February 15, 2007. The work plan proposed that the installation of the replacement wells at this site be completed after the site had been developed. The site developer has recently indicated that the installation of the wells can be initiated. Because of the upcoming holiday season and scheduling constraints, the earliest drilling dates available are **February 6 through 8, 2007**.

Based on the revised date of field activities, we will need additional time to receive lab reports and prepare the technical report. We respectfully request an extension for the submittal of this report to **April 19, 2007** (60 days following receipt of analytical data).

Your consideration in this matter is appreciated. Please respond as soon as you are able, and please contact me at (707) 268-3813 if you have any question regarding this matter.

**Cambria
Environmental
Technology, Inc.**

270 Perkins Street
Sonoma, CA 95476
Tel (707) 935-4850
Fax (707) 935-6649

C A M B R I A

Sincerely,
Cambria Environmental Technology, Inc.

Dennis Baertschi
Dennis Baertschi
Project Geologist



cc: Denis Brown, Shell Oil Products US
Bill Phua c/o Jay-Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA
94605-5260, Attention: H.K. Phares

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ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

August 14, 2006

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

Linli Lee
Foothill Blvd. LLC
141 Woodland Way
Piedmont, CA 94611-3839

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. [REDACTED], 4411 Foothill Boulevard, Oakland, CA

Dear Mr. Brown, Linli Lee, J.T. and Elizabeth Watters, and Walter Watters:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Subsurface Investigation Report and Monitoring Well Installation Work Plan," dated July 25, 2006, prepared on your behalf by Cambria Environmental Technology, Inc. The report describes the results of a subsurface investigation conducted May 15 through May 18, 2006 and presents a work plan for installation of replacement monitoring wells at the site. Previous monitoring wells at the site were decommissioned in July of 2005 to accommodate site redevelopment. The Work Plan proposes the installation of four monitoring wells to replace the decommissioned wells. We concur with the proposed scope of work.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Proposed Monitoring Well Locations.** The proposed monitoring well locations are acceptable. Please present the boring logs, well construction diagrams, soil sampling results, and initial groundwater sampling results in the Well Installation and Sampling Report requested below.
2. **Quarterly Groundwater Monitoring.** Following well installation, well development, and the initial groundwater sampling, the wells are to be sampled on a quarterly basis. Please present the results in the quarterly monitoring reports requested below.

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
August 14, 2006
Page 2

TECHNICAL REPORT REQUEST

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

- **February 15, 2007** – Monitoring Well Installation and Sampling Report
- **May 15, 2007** – Quarterly Monitoring Report for the First Quarter 2007
- **August 15, 2007** – Quarterly Monitoring Report for the Second Quarter 2007

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

ELECTRONIC SUBMITTAL OF REPORTS

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

Denis Brown
Linli Lee
J.T. and Elizabeth Watters
Walter Watters
August 14, 2006
Page 3

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

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: Dennis Baertschi, Cambria Environmental Technology, Inc., 270 Perkins Street, Sonoma, CA 95476

Bill Phua c/o Jay Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260
Attention: H.K. Phares

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

To: Gibbs, David; 'Brown, Denis L SOPUS-OP-COR-H'

Subject: Scehdule extension case RO0415

Dave,

Based on your request, the schedule for submittal of a Soil and Groundwater Investigation Report for case RO0415 is extended from June 30, 2006 to July 30, 2006.

Regards,

Jerry Wickham

Hazardous Materials Specialist

Alameda County Environmental Health

1131 Harbor Bay Parkway

Suite 250

Alameda, CA 94502-6577

510-567-6791 phone

510-337-9335 Fax

jerry.wickham@acgov.org

R0415

Wickham, Jerry, Env. Health

To: Gibbs, David; 'Brown, Denis L SOPUS-OP-COR-H'**Subject:** R00415 schedule extension

Dave,

Based upon site development activities at 4411 Foothill Boulevard in Oakland and your request, the schedule for submittal of a subsurface investigation report on case R00415 is extended to June 30, 2006.

Regards,

Jerry Wickham

Hazardous Materials Specialist

Alameda County Environmental Health

1131 Harbor Bay Parkway

Suite 250

Alameda, CA 94502-6577

510-567-6791 phone

510-337-9335 Fax

jerry.wickham@acgov.org

3/14/2006

Wickham, Jerry, Env. Health

From: Gibbs, David [dgibbs@cambria-env.com]
Sent: Thursday, May 11, 2006 11:55 AM
To: Wickham, Jerry, Env. Health
Cc: Denis Brown
Subject: Field Work Notification-4411 Foothill Blvd., Oakland

Jerry,

The subsurface investigation field work at the subject site is scheduled to begin on the morning of May 15th. The project consists of the advancement of four on-site and four off-site borings to provide additional information on the site's lithology and to vertically profile the subsurface contamination. This information will then be used to determine the screened intervals for the replacement wells to be installed. The work will be performed as described in the August 16, 2005 *Subsurface Investigation Work Plan and Site Conceptual Model*. I am currently trying to obtain access to the adjacent property to advance the off-site borings but the property owner is reluctant. I'm going to attempt to get the agreement signed prior to the start of field work but we will proceed with the on-site borings regardless of the outcome of the negotiations. The work should be entirely complete by the end of the day, May 19th.

Please feel free to contact me if you have any questions.

Sincerely,
Dave Gibbs

*David M. Gibbs, P.G.
Project Manager
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608
510.420.3363 tel
510.385.0269 mobile
510.420.9170 fax
dgibbs@cambria-env.com*

5/11/2006

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

November 22, 2005

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

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. [REDACTED] 11 Foothill Boulevard, Oakland, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the report entitled, "Subsurface Investigation and Over-Excavation Work Plan," dated November 16, 2005, prepared on your behalf by Cambria Environmental Technology, Inc. The report describes the results of a subsurface investigation conducted on August 29, 2005 and overexcavation activities conducted on September 20, 23, and 24, 2005. The over excavation removed approximately 370 cubic yards of hydrocarbon-impacted soils to a depth of approximately 20 feet below ground surface within the area of a circa 1958 fuel release prior to redevelopment of the site for commercial use. Soil samples collected from the base and sidewalls of the excavation indicated that chemical concentrations in the remaining soil are below applicable screening levels.

On June 23, 2005, Shell submitted a "Subsurface Investigation Work Plan and Site Conceptual Model" to conduct depth-discrete soil and groundwater sampling prior to installing monitoring wells at the site. ACEH approved the scope of work in the "Subsurface Investigation Work Plan and Site Conceptual Model" in correspondence dated August 29, 2005. The technical comments from the August 29, 2005 ACEH correspondence are also included below. Following completion of the proposed depth-discrete soil and groundwater sampling, a work plan to install monitoring wells and re-initiate groundwater monitoring at the site is to be submitted. ACEH concurs that the current findings in the "Subsurface Investigation and Over-Excavation Work Plan," do not provide cause to alter the proposed investigation.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Analyses for Lead Scavengers.** Please include laboratory analyses for 1,2-dichloroethane and ethylene dibromide by EPA Method 8260 for all soil and groundwater samples.

2. **Analyses for Total Lead.** Please include laboratory analyses for total lead using EPA Method 7421 for all soil samples.

TECHNICAL REPORT REQUEST

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

- **March 31, 2006** – Soil Boring and Grab Groundwater Sampling Results and Work Plan to Install Monitoring Wells

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board 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.

Denis Brown
November 22, 2005
Page 3

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

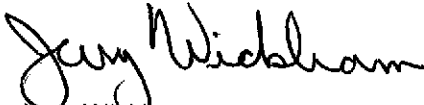
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

H.K Phares Corporation, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260

Bill Phua, P.O. Box 10664, Oakland, CA 94610-0664

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

From: Wickham, Jerry, Env. Health
Sent: Thursday, September 15, 2005 3:48 PM
To: 'Gibbs, David'
Cc: Denis Brown; Derby, Matt
Subject: RE: 4411 Foothill, Oakland Excavation Soil Sample Analysis

Dave,

Because the hydrocarbon release in this portion of the site is known to be a gasoline release, I concur that laboratory analyses for total petroleum hydrocarbons as diesel and motor oil is not required for the soil samples that will be collected during excavation.

Regards,

Jerry Wickham

Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Suite 250
Alameda, CA 94502-6577
510-567-6791 phone
510-337-9335 Fax
jerry.wickham@acgov.org

From: Gibbs, David [<mailto:dgibbs@Cambria-env.com>]
Sent: Thursday, September 15, 2005 3:37 PM
To: Wickham, Jerry, Env. Health
Cc: Denis Brown; Derby, Matt
Subject: 4411 Foothill, Oakland Excavation Soil Sample Analysis

Jerry,

As I told you on the phone earlier this afternoon, both STL and Kiff Laboratories have informed me that they would be unable to complete the requested analysis of the soil samples collected during the excavation at the site due to a current overload of samples requiring diesel analysis. According to the 1958 letter from Shell Oil Company to P.M Lehrman that discusses the detection of the leak in the portion of the site under investigation, it was gasoline that was released. There is no mention of diesel or waste oil. This letter is included in Attachment A of Cambria's August 16, 2005 *Subsurface Investigation Work Plan and Site Conceptual Model*.

In order to complete the excavation field tasks in a time frame that allows for the minimum interruption of on-going construction at the site, I request that diesel and waste oil be removed from the list of analytes.

Sincerely,
Dave Gibbs

David M. Gibbs, P.G.
Project Geologist
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608
510.420.3363 tel
510.385.0269 mobile

9/15/2005

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

September 14, 2005

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

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. ~~RO0000415~~, 4411 Foothill Boulevard, Oakland, CA – Over-Excavation Work Plan Approval

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the work plan entitled, "Over-Excavation Work Plan," dated September 13, 2005, prepared on your behalf by Cambria Environmental Technology, Inc. Over-excavation of soils is proposed to remove soils containing elevated concentrations of fuel hydrocarbons in an area of former USTs (circa 1858). The Work Plan proposes to remove hydrocarbon-impacted soil within the footprint of a proposed commercial building prior to building construction. The Work Plan adequately addresses the technical comments provided by ACEH in correspondence dated September 9, 2005. ACEH concurs with the proposed scope of work. Please perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

ACEH previously requested that the results of the August 29, 2005 soil borings be presented in a subsurface investigation report by December 13, 2005. We request that the results of the over-excavation and proposed confirmation sampling be presented in one report with the results of the August 29, 2005 soil borings. Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **7 days following over-excavation** – Preliminary Confirmation Sampling Results
- **December 13, 2005** – Over-Excavation and Sampling Report (to include results from August 29, 2005 soil borings in area of former USTs)

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

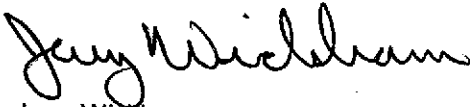
Denis Brown
September 14, 2005
Page 3

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

H.K Phares Corporation, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260

Bill Phua, P.O. Box 10664, Oakland, CA 94610-0664

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

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

September 9, 2005

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

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. ~~RO 000015~~, 4411 Foothill Boulevard, Oakland, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and soil and groundwater data collected from three soil borings in the southern portion of the site. These three soil borings (TB-1 through TB-3) were advanced and sampled on August 29, 2005 in order to assess potential contamination related to a 1958 release from three former underground storage tanks (USTs). Construction of a commercial building is currently planned for the southern portion of the site where the 1958 release apparently occurred. Total petroleum hydrocarbons as gasoline (TPHg) were detected in soil samples from the three soil borings at concentrations up to 1,600 milligrams per kilogram (mg/kg). TPHg was detected in groundwater at concentrations of 30,000 to 180,000 micrograms per liter ($\mu\text{g/L}$). Benzene was detected in soil at concentrations up to 2.2 mg/kg and was detected in groundwater at concentrations of 4,300 to 22,000 $\mu\text{g/L}$. ACEH is concerned with the elevated concentrations of fuel hydrocarbons in soil and groundwater within this area of the site and requires that contamination in this area of the site be addressed prior to construction of the planned commercial buildings.

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

TECHNICAL COMMENTS

1. **Soil Management.** ACEH requests that a plan be prepared that outlines the procedures to deal with any contaminated soil that may be encountered during excavation activities for the planned building construction. Please present your plans for soil management in the Work Plan requested below.
2. **Elevated Concentrations of Fuel Hydrocarbons in Southern Portion of Site.** The concentrations of total petroleum hydrocarbons as gasoline and benzene in soil exceed Environmental Screening Levels (California Regional Water Quality Control Board, Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, February

2005). The concentration of benzene in groundwater exceeds Environmental Screening Levels for evaluation of potential vapor intrusion concerns for commercial/industrial land use. Therefore, ACEH requests that the high concentrations of fuel hydrocarbons in soil and groundwater in the southern portion of the site be addressed prior to construction of a commercial building in this area. Please submit a Work Plan that describes your plans for addressing the elevated concentrations of fuel hydrocarbons in this area of the site.

TECHNICAL REPORT REQUEST

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

- **September 28, 2005 – Work Plan**

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

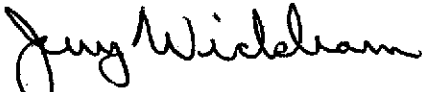
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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

Bill Phua, C/o Jay Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-
5260

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Wickham, Jerry, Env. Health

From: Gibbs, David [dgibbs@cambria-env.com]
Sent: Tuesday, September 06, 2005 1:55 PM
To: Wickham, Jerry, Env. Health
Cc: Denis Brown; Derby, Matt
Subject: 4411 Foothill, Oakland Sampling Results
Attachments: Results-Tbl.XLS; prop-bor 8-05.pdf

Jerry,

Attached please find a sampling results table and site plan for 4411 Foothill in Oakland.

As I told you on the phone this morning, we were unable to advance TB-2 beyond 8 fbg. We moved over close to TB-1 and tried again but, again, were unable to push the soil sampling rods beyond a few feet. We did manage to get the hydropunch down to 32 fbg but there was no water after approximately an hour so no samples were collected at this location.

I spoke with the site owner again after our conversation and he thinks it'll be 3 or 4 days before he'll be ready to do any digging in the area of investigation. Today he's just putting in temporary utility poles and marking locations and, possibly, beginning to dig the foundation for Building A.

Sincerely,
Dave Gibbs

*David M. Gibbs, P.G.
Project Geologist
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608
510.420.3363 tel
510.385.0269 mobile
510.420.9170 fax
dgibbs@cambria-env.com*

9/6/2005

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



File

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

August 29, 2005

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

Bill Phua
C/o Jay Phares
10700 MacArthur Boulevard, Suite 200
Oakland, CA 94605-5260

Subject: Fuel Leak Case No. RO0000415, 4411 Foothill Boulevard, Oakland, CA – Work Plan Approval

Dear Mr. Brown and Mr. Phua:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the work plan entitled, "Subsurface Investigation Work Plan and Site Conceptual Model," dated August 16, 2005, prepared on your behalf by Cambria Environmental Technology, Inc. The work plan proposes a scope of work to advance eight soil borings to further define the extent of petroleum hydrocarbons in soil and groundwater. ACEH concurs with the proposed scope of work provided that the technical comments below are addressed.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to jerry.wickham@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Analyses for Lead Scavengers.** Please include laboratory analyses for 1,2-dichloroethane and ethylene dibromide by EPA Method 8260 for all soil and groundwater samples.
2. **Analyses for Total Lead.** Please include laboratory analyses for total lead using EPA Method 7421 for all soil samples.

TECHNICAL REPORT REQUEST

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

- **January 10, 2006** – Soil Boring and Grab Groundwater Sampling Results and Work Plan to Install Monitoring Wells

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

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,

Denis Brown and Bill Phua
August 29, 2005
Page 3

and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

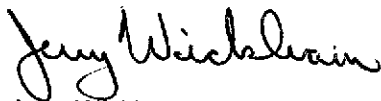
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Donna Drogos, ACEH
Jerry Wickham, ACEH



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



7

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

August 22, 2005

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

Bill Phua
C/o Jay Phares
10700 MacArthur Boulevard, Suite 200
Oakland, CA 94605-5260

Subject: Fuel Leak Case No. [REDACTED] 15, 4411 Foothill Boulevard, Oakland, CA – Work Plan Approval

Dear Mr. Brown and Mr. Phua:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the work plan entitled, "Subsurface Investigation Work Plan," dated August 22, 2005, prepared on your behalf by Cambria Environmental Technology, Inc. The work plan proposes a scope of work to drill and sample three soil borings at the location of a former underground storage tank complex (circa 1958) in the southern portion of the site. ACEH concurs with the proposed scope of work provided that the technical comments below are addressed.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below. We have been informed of the proposed schedule for field activities; therefore, no further notification of field activities is needed.

TECHNICAL COMMENTS

1. **Analyses for Lead Scavengers.** Please include laboratory analyses for 1,2-dichloroethane and ethylene dibromide by EPA Method 8260 for all soil and groundwater samples.
2. **Analyses for Total Lead.** Please include laboratory analyses for total lead using EPA Method 7421 for all soil samples.

TECHNICAL REPORT REQUEST

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

- **September 13, 2005** – Laboratory Results and Boring Logs
- **December 13, 2005** – Subsurface Investigation Report

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

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to 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 Instructions." 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. 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 monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an

appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

ENVIRONMENTAL HEALTH SERVICES

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

June 10, 2005

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

J.T. and Elizabeth Watters
600 Caldwell Rd.
Oakland, CA 94611

Walter Watters
101 Jasmine Creek Drive
Corona Del Mar, CA 92625-1420

Subject: Fuel Leak Case No. RO0001111 Shell#13-5686, 4411 Foothill Boulevard, Oakland, CA
– Comments on Monitoring Well Destruction Work Plan

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the document entitled, "Monitoring Well Destruction Work Plan," dated March 1, 2005, prepared by Cambria Environmental Technology, Inc. The work plan proposes the destruction of five monitoring wells on the site and temporary suspension of groundwater monitoring. The work plan indicates that proper destruction of the wells is necessary in order to prevent damage to the wells during construction. ACEH concurs with the plan to properly destroy the wells prior to construction.

Groundwater at the site is contaminated and groundwater monitoring will be required in the future. Therefore, additional groundwater monitoring wells will need to be installed at the site following construction activities. Based on staff review of the well destruction work plan, please address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Updated Site Conceptual Model and Monitoring Well Installation.** ACEH requests that a site conceptual model incorporating all recent data be completed for the site. The site conceptual model is to describe site-specific conditions and identify existing data gaps. The site conceptual model is to provide the basis for development of a work plan that will describe proposed sampling activities to address any existing data gaps. The work plan is to also describe the installation of monitoring wells for future groundwater monitoring at the site following destruction of the existing wells. Please present the site conceptual model and proposed plans for sampling in the work plan requested below.
2. **Quarterly Groundwater Monitoring.** Quarterly monitoring will be suspended during construction activities but is to be reinstated following construction and additional monitoring well installation. A schedule for resuming groundwater monitoring is to be provided in the work plan requested below.

TECHNICAL REPORT REQUEST

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

- **July 15, 2005** - Quarterly Report for the Second Quarter 2005
- **Site Conceptual Model and Work Plan** – August 19, 2005
- **Well Destruction Report** – 45 days following destruction of the wells

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

PERJURY STATEMENT

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

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

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

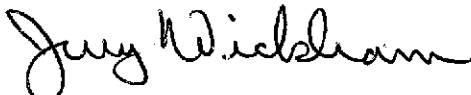
Mr. Denis Brown
June 10, 2005
Page 3

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Bill Phua
P.O. Box 10664
Oakland, CA 94610-0664

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

May 12, 2003

Amir K. Gholami, REHS
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

RO 415

Re: **Certified List of Record Fee Title Holders for:**
Former Shell Service Station
4411 Foothill Boulevard
Oakland, California
Incident #98995746

Alameda County
MAY 14 2003
Environmental Health



Dear Mr. Gholami:

This correspondence identifies the current landowner of the referenced property and is being made on behalf of Shell Oil Products US in compliance with section 25297.15(a) of Chapter 6.7 of the Health Safety Code. Landowner information for the referenced property was researched by using one or more of the following methods:

1. Directly contacting the county assessor's office.
2. Reviewing a private vendor database of assessor information, and/or
3. Reviewing Shell's or Cambria's files.

To the best of my knowledge, the following is a complete list of current fee title owners and their mailing addresses for the referenced property.

Bill Phua, P.O. Box 10664, Oakland, California 94610-0664

Sincerely,

Matthew W. Derby, P.E.
Senior Project Engineer



cc: Karen Petryna, Shell Oil Products US, P.O. Box 7869, Burbank, CA 91510-7869
Bill Phua, P.O. Box 10664, Oakland, CA 94610-0664
Bill Phua c/o Jay-Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260, Attention: H.K. Phares

G:\Oakland 4411 Foothill\Machado 5-12-03.doc

Cambria
Environmental
Technology, Inc.

5900 Hollis Street
Suite A
Emeryville, CA 94608
Tel (510) 420-0700
Fax (510) 420-9170

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

April 5, 2002
RO0000415

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

Re: Monitoring Well Installation Work Plan for Former Shell Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

Our office has received and reviewed the April 2, 2002 referenced work plan for the former Shell service station prepared by Cambria Environmental Technology, Inc., Cambria, your consultant. This well is intended to replace tank backfill well, BW-A, destroyed during the tank removal and excavation performed in January 2002. Our office approves of this work plan and you may proceed with this work as soon as possible. Please incorporate this well with the existing quarterly monitoring schedule.

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. J. Loetterle, Cambria Environmental, 1144 65th St., Suite B, Oakland CA 94608

Mwap4411FoothillBlvd

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

March 7, 2002
RO0000415

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

**Re: Underground Storage Tank Closure Report, Former Shell-branded Service
Station, 4411 Foothill Blvd., Oakland, CA 94601**

Dear Ms. Petryna:

Our office has received and reviewed the February 25, 2002 tank closure report for the referenced site prepared by Cambria Environmental Technology, Inc., your consultant. As you are aware, this report documents the removal of the former fuel tanks, dispensers, piping and hydraulic lifts at this site. In addition, confirmation soil sampling is reported after extensive over-excavation and grab groundwater sampled after dewatering activities. The addition of oxygen releasing compound is also detailed. These actions are expected to have a significant affect on groundwater quality at this site. Our office concurs with Cambria's recommendation for continued groundwater monitoring. Once declining and stable TPHg, BTEX and MTBE concentrations are obtained, site closure can be sought.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

VC: B. Chan, files

Mr. J. Loetterle, Cambria Environmental, 1144 65th St., Suite B, Oakland, CA 94608

02-4411FoothillBlvd

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

February 19, 2002
StID 113/RO0000415

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

Re: Former Shell-branded Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

Our office is aware of the recent (1/02) tank removals, over-excavation, groundwater removal and oxygen releasing compound addition performed at the referenced site and look forward to receiving a copy of the tank closure report. It appears that the tank backfill well, BW-A, may have been destroyed during these activities. In order to monitor the anticipated remediation within the former excavation pit, please install a replacement tank backfill well. An appropriate location might be down-gradient of former backfill well, BW-A.

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. J. Loetterle, Cambria Environmental Technology, 1144 65th St. Suite B,
Emeryville, CA 94608

J.T. & Elizabeth Watters, 600 Caldwell Rd., Oakland CA 94611

02-4411 Foothill Blvd

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

November 19, 2001
StID 113/ RO0000415

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

**Re: Corrective Action Plan for Shell-branded Station, 4411 Foothill Blvd.,
Oakland, CA 94601**

Dear Ms. Petryna:

Our office has received and reviewed the November 12, 2001 Corrective Action Plan for the referenced site as prepared by Cambria Environmental Technology, Inc., (Cambria), your consultant. I have discussed this pending work with both you and your consultant and I concur that after the removal of the underground tank system and site demolition, the most cost effective remediation approach would be over-excavation, removal of impacted groundwater, addition of oxygen release compound to the floor of the excavation and on-going monitoring.

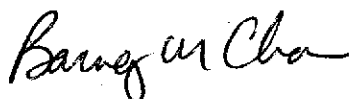
I have the following conditions and recommendations regarding this CAP:

- The Cambria work plan recommends soil excavation action levels of 1000 ppm by the PID or until physical constraints prevent additional excavation. Although I agree with the second half of this statement, PID readings can only serve as an estimate of petroleum contamination. Actual analytical test results should be used to make excavation limit determination. A mobile laboratory may be useful to give real time results. Specific soil and groundwater cleanup levels are not prescribed because they depend on site specific conditions, future property use and need for a deed restriction or risk management plan. However, both City of Oakland and SFRWQCB recommendations may be used as a guideline for soil and water clean-up levels.
- You are encouraged to add an "excess" amount of oxygen releasing compound to the excavation pit floor since its cost is reasonable.
- You are reminded that if ORC socks are added to the perimeter wells, they will need to be removed and wells purged prior to sampling.
- Please notify our office when over-excavation and sampling occurs so someone from this office can witness this work.

Ms. Karen Petryna
November 19, 2001
StID 113/ RO0000415
4411 Foothill Blvd., Oakland CA 94601
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. J. Loetterle, Cambria Environmental Technology, Inc., 1144 65th St., Suite B,
Oakland, CA 94608

CAPap4411FoothillBlvd

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

August 21, 2001
StID # 113/ RO 415

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

Re: Shell Service Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

Our office has received and reviewed the August 8, 2001 Second Quarter 2001 Monitoring Report for the referenced service station. This site has previously been characterized as one with elevated MTBE levels in groundwater primarily near the underground storage tank pit and inexplicably in the northern corner of the site. As with many Shell branded sites with elevated MTBE, regular scheduled dual phase extraction from wells has been the initial remediation approach. At this site, monitoring well S-2 and tank back-fill well BW-A are being evacuated. This approach, at best maintains the status quo and as long as no receptor is adversely affected or potentially affected is acceptable. Likely, an on-going source or leak exists at these sites. These sites are often characterized by elevated MTBE levels with considerably low to ND levels of TPHg. This indicates a selective release of MTBE, perhaps through volatilization and incomplete vapor recovery.

This recent report indicated an additional problem in that elevated TPHg levels were observed in all four wells at the site. Because the wells are basically located in each of the four quadrants of the site, the entire site appears to be impacted with TPHg levels ranging from 10,000-12,000 ppb. Two wells, S-1 and S-2 had not previously detected such elevated TPHg levels. Because this site is located near residences, apartments and single family homes, some with basements, and because groundwater is shallow, there is a potential for the accumulation of hydrocarbon vapors into buildings. Please have your consultant review the monitoring data and comment on these new findings and offer recommendations to reduce the migration of both TPHg and MTBE levels at this site.

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. James Loetterle, Cambria Environmental, 1144 65th St., Suite B, Oakland CA 94608

2Q01 4411 Foothill Blvd

FAX COVER

To: Mr. Barney M. Chan

Company : Alameda Health Care Services Agency

Fax Number : 15103379335

From : Jeanette P. Watters

Company :

Fax Number : (949) 640-1298

Subject : Re: Shell Station, 4411 Foothill Blvd, Oakland, CA

Pages including cover page: 1

Time : 10:45:40 AM

Date : 04/06/2001

MESSAGE

#113

April 6, 2001

Mr. Barney M. Chan
 Alameda Health Care Services
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577

Re: Letter of April 3, 2001 to Ms. Karen Petryna
 Subject: Shell Service Station, 4411 Foothill Blvd, Oakland, CA, 94601

Dear Mr. Chan:

This letter is to inform you that my brother James Watters and I are co-owners of the station at 4411 Foothill Blvd. I would appreciate it if you would copy me in all future correspondence concerning the property. It will also be helpful to receive a copy of Ms. Petryna's response to your letter of April 3, 2001.

As my brother and I live some distance apart, it is necessary as well as convenient for each of us to maintain separate and complete files. It would be most helpful if you would be kind enough to send me a duplicate of any prior correspondence regarding the station.

Very truly yours,

Walter G. Watters
 101 Jasmine Creek Drive
 Corona del Mar, CA 92625-1420
 Tel: (949) 640-0515 Email: jcpwo@aol.com

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

April 3, 2001

StID # 113

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

Re: Shell-branded Service Station, 4411 Foothill Blvd., Oakland, 94601

Dear Ms. Petryna:

Our office has received and reviewed the March 29, 2001 Fourth Quarter 2000 Monitoring Report and Letter Response from Cambria, your consultant. We offer the following observations and requests for this site:

- Please provide an interpretation of the results found from your monitoring events. Significant changes in concentrations are observed, however, no explanation is given. What is happening in respect to the MTBE plume? Bio-parameters are being tested during each monitoring event, but no evaluation is being offered. In respect to the dissolved oxygen and oxidation-reduction potential readings, no evaluation regarding the effectiveness or life-span of the ORC socks is mentioned.
- We understand that monthly dual-vacuum extraction will be implemented from well S-2 and well BW-A for a period of six months. Therefore, it is assumed that groundwater will be sampled and tested from BW-A to estimate the amount of TPH and MTBE removed.
- No contour lines are shown for this site on Figure 1, the area's gradient map. Why weren't they shown?
- It was noted that on 12/12/2000, the depth to water measurement was done for a second time that month, just after the 12/4/2000 sampling event. What was the reason for this?
- It was also noted that the sample from well S-2 was run for MTBE beyond the acceptable hold time. What is the effect of this in the reported results? How did this happen with this sample and not any other?

Please comment and address these observations in your next monitoring report. 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. J. Loettele, Cambria Environmental, 1144 65th St., Suite B, Oakland CA 94608

J.T. & Elizabeth Watters, 600 Caldwell Rd., Oakland CA 94611

Mr. T. Bauhs, Chevron USA, P.O. Box 5004, San Ramon, CA 94583-0804

2-4411 Foothill



State Water Resources Control Board



Winston H. Hickox
Secretary for
Environmental
Protection

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

Gray Davis
Governor

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website at www.swrcb.ca.gov.

MAR - 8 2001

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

UNDERGROUND STORAGE TANK CLEANUP FUND (FUND), NOTICE OF ELIGIBILITY DETERMINATION: CLAIM NUMBER 016088; FOR SITE ADDRESS: 4411 FOOTHILL BLVD, 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

California Environmental Protection Agency



State Water Resources Control Board



Winston H. Hickox
*Secretary for
Environmental
Protection*

Division of Clean Water Programs
1001 J Street • Sacramento, California 95814 • (916) 341-5714
Mailing Address: P.O. Box 944212 • Sacramento, California • 94244-2120
FAX (916) 341-5806 • Internet Address: <http://www.swrcb.ca.gov/cwphome/ustcf>

Gray Davis
Governor

JAN 17 2001

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

UNDERGROUND STORAGE TANK CLEANUP FUND PROGRAM, REQUEST FOR
FURTHER DOCUMENTATION DURING INITIAL REVIEW: CLAIM NUMBER 016088;
FOR SITE ADDRESS: 4411 FOOTHILL BLVD, OAKLAND

After reviewing your claim application to the Cleanup Fund, we find that the following
additional information is needed to determine your eligibility for placement on the Priority List:

Please provide a copy of the Upgrade Certificate.

NOTE: Failure to respond to this request within thirty (30) calendar days from the date of this
letter may result in an ineligibility determination of your claim.

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

Mr. Thomas Peacock
Alameda County EHD
1131 Harbor Bay Pkway, 2nd Fl.
Alameda, CA 94502-6577

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) 337-9535

December 11, 2000
StID # 113

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

Re: Shell Station, 4411 Foothill Blvd., Oakland, CA 94601

Dear Ms. Petryna:

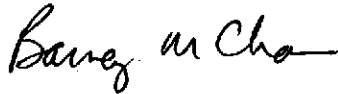
Our office has received and reviewed the November 17, 2000 Cambria Site Investigation Report for the above referenced site. This report, as you are aware, contains the installation report for MW-4 and the investigation of boring SB-4. It also discusses the results of a sensitive receptor and utility survey and documents the groundwater purging from back-fill well BW-A. I have the following comments to this report:

- Even though a monitoring well was not able to be installed at the location of SB-4, adjacent to the existing building, the soil and groundwater results from this boring are elevated and indicate a potential human health risk to the commercial workers at the site. Will remediation be considered in this area? If so, what type?
- The gradient at this site has been from northeast to northwest, however, the reports states a general east to southeast direction. Please compile a rose diagram indicating the historic gradient direction.
- Your receptor survey did not identify any water wells or surface water bodies that might be impacted, however, I was hoping for the survey to corroborate the absence of basements as reported by Chevron's past survey.
- Though your reports present a map of the utilities, your report fails to provide an interpretation of the fate of any preferential groundwater transportation and an evaluation of its risk.
- This report states that a total of 2800 gallons of groundwater was extracted from BW-A on July 30 and August 4, 1999. Groundwater extraction was to be done on **both** wells S-2 and BW-A weekly and its effectiveness evaluated. Because of the long-term elevated TPHg, BTEX and MTBE levels at this site, groundwater extraction should continue to be done on a routine basis, at a minimum. Please indicate your current groundwater extraction schedule. Can well S-4 be added to this remediation?

Please provide your written comment to this letter with your next monitoring report. You may contact me at (510) 567-6765 if you have any questions.

Ms. Karen Petryna
Re: 4411 Foothill Blvd., Oakland CA 94601
StID # 113
December 11, 2000
Page 2

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

✓ C: B. Chan, files

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

Mr. T. Bauhs, Chevron USA, P.O. Box 6004, San Ramon, CA 94583

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

Mr. S. Hooton, BP Oil Co., 295 SW 41st St., Bld, 13, Suite N, Renton WA 98055-4931

2stat4411 Foothill

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



August 1, 2000
StID # 113

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

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

Re: Status of Investigation at Shell-branded Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

Our office has received and reviewed the July 11, 2000 First Quarter 2000 Monitoring Report for the above site, prepared by Cambria Environmental Technology, Inc. (Cambria). This report provides the groundwater sampling results for the 3/9/00 sampling of wells S-1 through S-3 and the 3/31/00 sampling of the newly installed well, S-4. The initial results from S-4 indicate that the TPHg, BTEX and MTBE release has also impacted the eastern part of the site. This may be the result of the previously identified releases from the eastern dispensers and the wide gradient noted at the site.

This quarterly monitoring report did not provide any of the information requested in my January 5, 2000 letter. Some of this information may have been done as part of Chevron's investigation at 4265 Foothill Blvd., however, the Chevron release is not identical to that of Shell. You are reminded that your monitoring reports should not only include a summary of past but also describe what is expected to be done during the next quarter. Your quarterly monitoring report should be submitted in a timely fashion, at a minimum, before the next quarter's scheduled sampling. Please insure that the next quarterly report includes the results of or a schedule for the performing of the following:

- A utility pathway survey, in lieu of sampling along the utilities,
- A sensitive receptor survey,
- Monitoring well installation report for MW-4 and
- The weekly vacuuming of groundwater from well S-2 and backfill well BW-A.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

✓ B. Chan, files

Mr. D. Ataide, Cambria, 1144 65th St., Suite B., Oakland CA 94608
Mr. T. Bauhs, Chevron USA, P.O. Box 6004, San Ramon, CA 94583
Ms. Erica Myran, Albertson's Inc., P.O. Box 20, Boise, ID 83726
Mr. S. Hooton, BP Oil Co., 295 SW 41st St., Bld. 13, Suite N, Renton WA 98055-4931

Stat4411Foothill

C A M B R I A

ENVIRONMENTAL
PROTECTION

May 8, 2000

00 MAY -9 PM 4: 13

Ro 415

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

Re: Certified List of Record Fee Title Holders for:
Shell-branded Service Station
4411 Foothill Blvd.
Oakland, CA
Incident No. 98995746



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.

Walter G. & Jeanette P Watters, Trs., 101 Jasmine Creek Drive, Corona Del Mar, CA
92665

J.T. & Elizabeth G. Watters, Trs., 600 Caldwell Road, Oakland, CA 94611

Sincerely,

Diane Lundquist, P.E.
Principal Engineer

cc: Karen Petryna, Equiva Services LLC, P.O. Box 7869, Burbank, California 91510-7869
Walter G. & Jeanette P Watters, Trs., 101 Jasmine Creek Drive, Corona Del Mar, CA
92665
J.T. & Elizabeth G. Watters, Trs., 600 Caldwell Road, Oakland, CA 94611

Oakland, CA
San Ramon, CA
Sonoma, CA
Portland, OR

**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



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION

1131 Harbor Bay Parkway

Alameda, CA 94502-6577

(510) 567-6700

(510) 337-9432

January 5, 2000

StID # 113

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

Re: Letter Response and Work Plan for 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

This letter serves to respond to the December 13, 1999 letter referenced above, which was prepared by Cambria Environmental Technology, Inc. in response to my November 10, 1999 letter. It additionally revises an earlier work plan for a monitoring well installation, to account for our office's concern over MTBE.

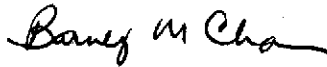
As you are aware, this site in addition to likely having a commingled plume from a nearby service station, has a significant MTBE problem. My November 10, 1999 letter requested that you develop a site conceptual model (SCM) to attempt to understand the release and its potential impact. On your behalf, Cambria has proposed the following to address this letter:

- Cambria will identify potential sensitive receptors within a ¼ mile radius. This information will be provided in a future monitoring report.
- Cambria identified three sewer mains, which through their backfill, could act as preferential pathways. In lieu of sampling along the backfill of these utilities, please follow and identify all potential paths of these utilities and verify that no sensitive receptor would be affected from this release.
- Cambria proposes to sample soil and a grab groundwater sample from the bottom boring from MW-4 in order to define the vertical extent of the MTBE contamination. This is clearly not sufficient to establish the vertical extent of contamination, however, it may give an indication of the extent of the release in the area of this well. Because the RWQCB has not yet issued their recommendations on MTBE investigation, our office agrees to hold off additional "deep" groundwater investigation to such time that there is a Water Board recommendation. However, our office approves of the discrete soil and groundwater sampling of the bottom of the boring. In addition, soil samples should also be taken every five feet for screening purposes using a PID or FID instrument. If any of these samples detect hydrocarbons, the sample should be analyzed for TPHg, BTEX and MTBE.
- In regards to remediating MTBE in groundwater, should the 12/99 sampling results confirm the elevated MTBE concentrations, Cambria proposes weekly vacuum truck extraction from backfill well BW-A and monitoring well S-2. The amount of MTBE removed will be estimated from the concentration and volume of water removed. When this is done, please take groundwater elevations of the nearby wells to estimate the radius of influence from the extracting well. Be aware that additional remediation may still be needed, depending on the success of this action.

Ms. K. Petryna
StID # 113
4411 Foothill Blvd., Oakland CA 94601
January 5, 2000
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 Environmental Technology, Inc., 1144 65th St., Suite B,
Oakland 94608

4411Foothill

C A M B R I A

DONE 12/3/99
Be

November 23, 1999

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

#113 ✓

Re: Certified List of Record Fee Title Owners for:
Shell-branded Service Station
4411 Foothill Blvd.
Oakland, CA
Incident No. 98995746



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.

J.T. & Elizabeth G. Watters, Trs., 600 Caldwell Road, Oakland, CA 94611 ✓

Sincerely,

ASL

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

Barbark ✓

cc: Karen Petryna, Equiva Services LLC, P.O. Box ~~6249~~, ~~Carson~~, California, ~~90749-6249~~ ✓
J.T. & Elizabeth G. Watters, Trs., 600 Caldwell Road, Oakland, CA 94611

Oakland, 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



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

November 10, 1999
StID # 113

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

Re: Shell Service Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

Our office has received and reviewed the Second Quarter 1999 Monitoring Report for the above site prepared by Cambria, your consultant. As you are aware, this station has observed extremely high levels of MTBE in groundwater, particularly in well S-2. The June 14, 1999 monitoring event reported 67,500 ppb. Over the three years where MTBE has been monitored, the concentrations have varied, however, they have never been as high as reported in this recent event. There are certainly scenarios to explain this situation and hopes are that current tank system no longer serves as a source for MTBE. The recent attempt for remediation of MTBE was the installation of oxygen releasing compound (ORC) socks into the wells S-1 and S-2 and backfill well BW-A done on September 30, 1999. This is based on the belief that in the absence of TPHg and BTEX, MTBE will be bio-remediated by the native microbes and they in turn will benefit from the addition of oxygen. Please be aware that if an immediate decrease in MTBE is not observed in well S-2, our office will require a more aggressive approach.

The Water Board is working on a guidance document on the handling of MTBE impacted sites. They have been providing training and will soon be issuing formal guidance. A critical element of their policy will be the requirement of a site conceptual model (SCM). This must provide a good understanding of the hydrogeology, receptors and contaminant concentration trends, all of which, is used for decision making at the site. Some of the items of the SCM already exist for this site, while others do not. The SCM should be presented in form of a comprehensive report, which ultimately will be part of your closure request package.

At this time, our office requests the following required elements of your SCM:

- Provide a map indicating the source(s) of contamination. How can you verify that no on-going sources exist?
- Please identify the receptor(s), if any and their locations, include a well survey.
- Please verify that no preferential pathways exist.
- Please prepare plots of chemical concentration vs. time and chemical concentration vs distance from source.

Ms. K. Petryna
4411 Foothill Blvd., Oakland CA 94601
StID # 113
November 10, 1999
Page 2.

- Define the vertical and lateral extent of contamination. This will require that a deep groundwater sample be taken.
- Provide a work plan for active remediation of the source area if groundwater concentrations remain at current high level.

Please provide the above items, including a work plan for determining the vertical extent of contamination, to our office **within 30 days or no later than December 13, 1999**. Our office encourages you to look at all other Alameda County Shell sites with similar (elevated MTBE in groundwater) conditions to prepare work plans to meet the SCM requirements. I will be addressing these sites in separate correspondences.

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
1MTBE4411Foothill

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

June 18, 1999
StID # 113

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

Re: Letter Response for Shell Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

Our office has received and reviewed the June 15, 1999 response letter to my April 30, 1999 letter from Cambria, your consultant. I also have spoke with Mr. D. Ataide of Cambria regarding the letter's content. The proposed work plan calls for the installation of oxygen releasing compound "socks" in monitoring wells S-2, S-7 and the tank back-fill well. Our office believes that this may not be a very effective method to treat the MTBE plume due to the limited amount of oxygen and the limited area of treatment from these treatment wells, however, we agree to approve this work plan and carefully observe the effectiveness of this treatment.

Please review the monitoring data and replenish the "socks" as frequent as necessary to obtain the optimum conditions for TPH and MTBE degradation. More aggressive remediation will be required if this approach is not effective.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

~~Barney M. Chan~~

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

Wpap4411

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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 # 113

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

Re: Work Plan for Shell-branded Service Station, 4411 Foothill Blvd., Oakland 94601

Dear Ms. Petryna:

Our office has received both the January 11, 1999 Work Plan and the March 18, 1999 Work Plan Addendum for the above site prepared by Cambria Environmental Technology, (Cambria). I have also spoke with Mr. Darryk Ataide of Cambria regarding my comments and concerns regarding both reports. This letter serves to repeat my concerns and request further clarification.

My initial concern questioned whether the amount of oxygen releasing compound to be installed in monitoring and tank backfill wells was sufficient. The printout I received from Cambria indicated the input parameter for the concentration of hydrocarbons should be the BTEX concentration. I questioned why TPHg concentrations were not used since TPHg will also consume oxygen when it is biodegraded aerobically.

My second concern was the recommended use of oxygen releasing compound at this site where elevated MTBE exists in groundwater. I don't believe that MTBE has been shown to be able to be remediated by the addition of only ORC. In addition, the highest MTBE concentrations has been found in monitoring well S-2, which lies down-gradient, beyond the proposed barrier of ORC.

Given the elevated concentrations of MTBE at this site, our office requests a feasibility study be performed to evaluate alternatives to prevent its migration. We would also like an opinion as to the likely source(s) of the MTBE release and an opinion of the likely fate of the MTBE plume(s). Please provide a written response to the above concerns **within 45 days or by June 15, 1999.**

At this time you may schedule the installation of the proposed additional monitoring well, S-4. 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 Environmental Technology, 1144 65th St., Suite B, Oakland 94608

Wprsp-4411 Foothill

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

December 7, 1998
StID # 113

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

Re: Shell Service Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Ms. Petryna:

Our office has received and reviewed the November 20, 1998 Third Quarter 1998 Monitoring Report for the above site as prepared by Cambria, your consultant. A number of observations were made which indicate that additional investigation or remediation may be necessary for this site. Among our observations include the following:

- The TPHg concentration in wells S-1 and S-3 remain high (up to 26 ppm) and the MTBE concentration is very high, 12,000 ppb in well S-2.
- The bio-indicator parameters do not support the theory that natural aerobic bio-degradation is favored.

Because the conditions for using monitored natural attenuation are defined by the Water Board's January 5, 1996 letter and their recommendations for characterizing risk at MTBE impacted sites, it is apparent that this site has not achieved the conditions for MNA. The site has not been adequately characterized, therefore, it is not certain whether the plume, petroleum or MTBE, is migrating. Our office acknowledges that a well and basement survey has been done in neighboring homes and this potential pathway does not appear to be a health risk problem.

Please provide an explanation for the fluctuating concentrations of TPHg and MTBE being observed at this site. Where are the sources of soil and groundwater contamination and is there a need to further characterize the site either on or off-site? The recent dispenser soil sampling report shows signs of gasoline releases beneath the dispenser islands that may act as a source at this site. Cambria suggests that the existing three wells are adequate to monitor the potential releases from beneath the dispensers. Our office disagrees.

The high MTBE being found in well S-2 requires further investigation. How is this plume migrating off-site and are there any preferential migration pathways? Please explain the reoccurring trend of elevated MTBE and low TPHg found in well S-2.

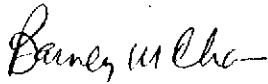
The results of recent monitoring of natural attenuation parameters indicate that conditions do **not** support aerobic bio-degradation. The dissolved oxygen is low and the oxidation-reduction potential is either negative or less positive than previously noted. Please provide a plan to enhance the dissolved oxygen in groundwater.

Your written response to the above items is requested **within 30 days or by January 11, 1999.**

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

Ms. K. Petryna
4411 Foothill Blvd., Oakland CA 94601
StID # 113
December 7, 1998
Page 2.

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files
Mr. D. Ataide, Cambria Environmental, 1144 65th St., Suite B, Oakland CA 94608
4411fthill

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



January 14, 1998
StID # 113

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: Shell Service Station, 4411 Foothill Blvd., Oakland CA 94601

Dear Mr. Perez:

Our office has received and reviewed the Cambria Third Quarter 1997 Monitoring report for the above referenced site. Analytical results are fairly consistent with prior results. It, therefore, appears that natural biodegradation which is anticipated for most sites is not occurring efficiently. Because of this, our office requests that Shell initiate the monitoring for bioremediation parameters. These parameters should include, at a minimum, dissolved oxygen, oxidation-reduction potential, nitrate, sulfate and ferrous iron (+2). Please include these parameters plus an interpretation of these results and recommendations for the addition of supplements (if necessary) on your future monitoring reports.

At this point, it is unclear whether MTBE really exists and to what extent it exists at this site. Although MTBE has been detected in groundwater samples, the one time it was "confirmed" using EPA Method 8260, it was not detected. Therefore, our office requests that future MTBE analysis be run by EPA Method 8260 until a trend in these concentrations is exhibited. At that time you may return to the MBTEX analysis by EPA Method 8020.

Please be aware the neighboring Chevron site at 4265 Foothill Blvd. has added Oxygen Releasing Compound (ORC) in a number of their impacted wells based upon similar chemical analysis.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

c: Mr. Khaled Rahman, Cambria Environmental Technology, 1144 65th St., Suite B, Oakland CA 94608

B. Chan, files
bio4411

white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF
ENVIRONMENTAL HEALTH
Hazardous Materials Inspection Form


1131 Harbor Bay Pkwy
Alameda CA 94502
510/567-6700

II, III

Site ID # _____ Site Name Moran Shell Today's Date 6/27/95
Site Address 444 Janshull Blvd
City _____ Zip 94601 Phone _____

_____ MAX AMT stored > 500 lbs, 55 gal., 200 cft.?
Inspection Categories:
_____ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
_____ II. Hazardous Materials Business Plan, Acutely Hazardous Materials
_____ III. Under ground Storage Tanks

* Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

Comments: Clear 

<u>Bondst</u>		<u>Shell</u>
		<u>○</u>
		<u>○</u>

Only 4 of the globules have been advanced @ ~400 pm
The rest will be drilled on 6/28/95
Boring made drilled to 12', spuds clear down to 20'
+ Bondst 20' (GW not yet encountered)
- Charles Ross of PEG present

Contact _____
Title _____
Signature _____
Inspector B. Chan
Signature _____

II, III

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

May 19, 1995
StID # 103 and 113

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

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

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

Dear Sirs:

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

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

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

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

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

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

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

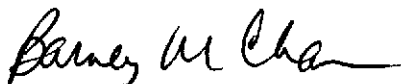
Chevron was to perform a Health Risk Evaluation using the concentration of contaminants being found in well C-4 and their effects on the residences next door. As an initial approach the Risk Based Screening Levels in the ASTM ES-38 document would be used for comparison. Chevron would be in contact with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

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

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

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
M. Cooke, Weiss Associates, 5500 Shellmound St., Emeryville,
CA, 94608
Mr. R. Tinline, Pacific Environmental Group, Inc., 2025
Gateway Place, Suite 440, San Jose, CA 95110
B. Raynolds, files

mtgSh&Ch

**ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY**

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

April 28, 1995
StID # 113

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

**Re: Review of April 25, 1995 Site Assessment Work Plan for Shell
Service Station, 4411 Foothill Blvd., Oakland CA 94601**

Dear Mr. Kirk:

Our office has received and reviewed the above report written in response to my March 14, 1995 letter. Recall, that letter requested that both Shell and Chevron prepare Remedial Action Plans (RAP) to address the significant gasoline and BTEX migrating from each of their gasoline station. Based on the difficult task of determining the specific source of offsite gasoline migration, it appeared that requesting action from both potential responsible parties would be the most productive action. Thus, I wrote the March 14th letter. You should be aware that an upcoming meeting at the County's offices with you and I and Mr. Mark Miller of Chevron should shed light on the way each party is approaching this investigation as well as clarify the County's immediate concerns and requirements. This meeting is tentatively scheduled for May 17, 1995 at 10:00 am pending all parties ability to attend.

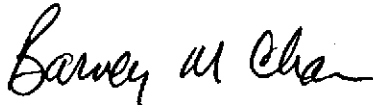
Upon review of the above referenced report, it appears that Shell Oil would like to perform additional site assessment prior to considering the need for a RAP. This assessment would be in the form of a Geoprobe study both onsite and offsite in directions toward the Chevron station and towards monitoring well C-7 on the Lucky's parking lot. Our office has no objections to this work plan and you may proceed as soon as possible on the condition that you add the following analytes to your groundwater samples: Total Petroleum Hydrocarbons as diesel and as motor oil plus semi-volatiles. Recall, these analytes have or were once detected in well S-1 and may give some indication of downgradient contaminant migration from this well. In the same line of thinking, it is advisable to analyze the Chevron offsite wells for these parameters as well.

Please contact me at least 48 working hours prior to any field work so I may arrange to be present if possible.

Mr. Dan Kirk
StID # 113
4411 Foothill Blvd.
April 28, 1995
Page 2.

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
Mr. R. Tinline, Pacific Environmental Group, 2025 Gateway
Place, Suite 440, San Jose, CA 95110
M. Miller, Chevron USA, 2410 Camino Ramon, San Ramon CA
94583
B. Raynolds, files
wp4411

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 14, 1995
StID # 113

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

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

**Re: Status of Site Investigation at 4411 Foothill Blvd.,
Oakland CA 94601**

Dear Mr. Kirk:

The ongoing investigation at this operating Shell station and that of the adjacent Chevron station (4265 Foothill Blvd.) has provided interesting information which hopefully has clarified the sources of groundwater contamination coming from both sites. Our office has been patient in reviewing the groundwater gradient information and now requests that Shell perform a Remedial Action Plan (RAP) inclusive of a feasibility study for the petroleum contamination on and offsite. Please provide your RAP to our office **within 45 days or by April 28, 1995.**

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

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

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
Mr. R. Tinline, Pacific Environmental Group, 2025 Gateway
Place, Suite 440, San Jose, CA 95110
M. Miller, Chevron USA, 2410 Camino Ramon, San Ramon, 94583
G. Coleman, files RAP4411

Shell Oil Company



P. O. Box 5278
Concord, CA 94520-9998
(510) 675-6165

June 1, 1994

Alameda County Health Care Services
Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
Attn: Barney M. Chan

Subject: Shell Service Station
4411 Foothill Blvd.
Oakland, CA 94601

Dear Mr. Chan:

This letter has been prepared to respond to your letter dated May 6, 1994. On behalf of Shell I accept your invitation for a joint meeting for the site referenced above. The consultant working on the Shell site at 4411 Foothill Blvd. and myself will attend.

You may contact me at (510) 675-6168 to discuss the availability of the consultant and myself.

Sincerely,

D. T. Kirk

D. T. Kirk
Area Environmental Engineer
Shell Oil Company

cc: Ross Tinline, Pacific Environmental Group, Inc.
K. Graves, RWQCB-San Francisco Region

R0415

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

August 25, 1993
StID # 113

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

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

**Re: Shell Service Station at 4411 Foothill Blvd., Oakland
CA, 94601**

Dear Mr. Kirk:

Our office has received the August 20, 1993 letter from Mr. Markus Niebanck of HETI. Recall, this letter was in response to my July 28, 1993 letter requesting Shell's plans for further investigation at this site. Because of the difference in groundwater gradient of this site and that of the Chevron site at 4265 Foothill Blvd., HETI stated they were currently in the process of re-surveying all Shell and Chevron monitoring wells to a common datum, allowing for comparison of all water elevation data. Today I spoke with Mr. Tim Watchers of Groundwater Technology, the well sampler for the Chevron site and he confirmed that the groundwater elevation for that site is compared to mean sea level as is at the Shell site. Therefore, it appears that the groundwater elevation measurements are comparable. It would, though, be advantageous to take groundwater elevation and samples the same day for these two sites.

Even though groundwater gradient measurements should be taken over a long period of time to verify directional trends, Shell as well as Chevron must consider the appropriate options for containing on-site and remediating offsite contamination. Again, our office offers a forum for the joint meeting of all potential responsible parties to reach a common goal. Please keep our office informed of your progress with this site and communications with Chevron. You may contact me at (510) 271-4530 if you have any questions.

Sincerely,

Handwritten signature of Barney M. Chan in cursive.

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
M. Niebanck, HETI, 2363 Mariner Square Drive, Suite 243,
Alameda, CA 94501
M. Miller, Chevron USA, 2410 Camino Ramon, San Ramon, CA
94583
E. Howell, files 3-4411

Agree that we should probably
wait for the next few GW monitoring
events where the wells on Shell &
Chevron are measured jointly.
Nevertheless, Chevron and/or Shell must
consider alternatives for offsite
contamination remediation

August 20, 1993

Mr. Barney Chan
Alameda County Department of Environmental Health
80 Swan Way, Room 300
Oakland, CA 94621

12-010

Re: Shell Service Station, WIC No. 204-5508-3400, 4411 Foothill Blvd., Oakland

Dear Mr. Chan,

This letter is with regard to your transmittal to Mr. Dan Kirk of Shell Oil Company dated July 28, 1993 concerning the environmental investigation at the referenced location. On behalf of Shell, the following information addresses the items you listed in your letter.

Ground Water Gradient:

Recent ground water gradient determinations at the Shell site are not consistent with those reported by Chevron (across High Street). As you indicated, a combined Shell-Chevron effort with regard to gradient measurement would certainly be beneficial. We are currently in the process of coordinating a joint sampling/monitoring visit with Chevron. We are planning to re-survey all Shell and Chevron monitoring wells to a common datum, allowing for the comparison of all water level data.

Ground water levels will be monitored in Shell wells on a monthly basis for the next two quarters. We assume that monthly levels will also be measured by Chevron, so as to enable a comprehensive evaluation of flow patterns across the two sites. The utility of continued monthly readings will be assessed at the close of the second quarter.

Additional Monitoring Wells:

Given the uncertainties associated with ground water gradient measurements recorded to date, it would not be prudent to proceed with the installation of any additional monitoring wells at this time. We believe that the upcoming coordinated activities will provide a great deal of useful information regarding the potential need for additional wells. An in-depth evaluation of appropriate investigative methods will be made at this time.

If you have any questions or comments regarding this information, please do not hesitate to contact Mr. Dan Kirk of Shell at (510) 675-6178.

Very truly yours,

HYDRO-ENVIRONMENTAL TECHNOLOGIES, INC.



Markus B. Niebanck, R. G.

Western Regional Manager

cc. Mr. Dan Kirk, Shell Oil Company

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

July 28, 1993
StID # 113

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

**Re: Comment on July 22, 1993 Report Regarding the Installation
of Two Monitoring Wells at 4411 Foothill Blvd., Oakland,
CA 94601.**

Dear Mr. Kirk:

Thank you for the submission of the above referenced report prepared by your consultant, Hydro Environmental Technologies, Inc., HETI. Upon review of this report, it is apparent that there is extensive groundwater contamination beneath this site not readily associated with contaminated soils. The highest soil contamination noticed was 1300 ppm gasoline found in the 11 foot sample from well S-3. The groundwater samples from wells S-1 through S-3 contained up to 39 mg/l gasoline, up to 1.5 mg/l benzene and 6 mg/l diesel. The gas and benzene concentrations are comparable to levels being found on the Chevron station across the street and in the wells downgradient to this site, C-6 and C-7, based on the gradient inferred on the Chevron site.

The gradient determined on the Shell site is towards the northwest. This flow direction is similar to that found on the BP station to the north of the Shell station, but is not consistent with that found on the Chevron station. This, obviously, affects the responsibility which Shell and Chevron will assume for the remediation of groundwater contamination to the south of the Chevron and Shell sites. Certainly, a combined effort should be done to facilitate the investigation and remediation of the petroleum release offsite of all properties. Our office encourages you to contact Mr. Mark Miller of Chevron in an attempt to verify groundwater gradient and identify the source of the petroleum contamination offsite of both properties.

Our office would recommend monthly groundwater elevation readings and gradient calculation for the first year at this site. It will also be necessary for you to determine the extent of groundwater contamination migrating from your site. Additional monitoring wells are necessary. It appears that the Chevron site is down gradient to the Shell site given the current inferred gradient.

Mr. Dan Kirk
StID # 113
4411 Foothill Blvd.
July 28, 1993
Page 2.

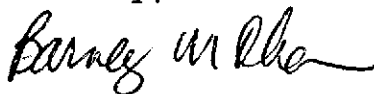
In addition, please perform all subsequent monitoring well events at the same time for all three wells. It would also be advantageous to sample your wells either at the same time or within a short time as when Chevron samples their wells. You should also insure that the groundwater elevation and gradient data from Shell is comparable with that of Chevron. You are reminded that Chevron's assumed a similar gradient to their site's and implies that Shell is the potential source of the groundwater contamination in well C-7, the well within the Lucky supermarket's parking area.

If necessary, our office and the RWQCB will facilitate a meeting of all potential responsible parties to set realistic goals for the overall investigation and remediation.

Please provide a written response the above concerns **within 30 days or August 30, 1993.**

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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
M. Niebanck, HETI, 2363 Mariner Square Drive, Suite 243,
Alameda, CA 94501
M. Miller, Chevron USA, 2410 Camino Ramon, San Ramon, CA
94583
E. Howell, file

2-4411

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

March 3, 1993
StID # 113

Shell Oil Company
Mr. Dan Kirk
P.O. Box 5278
Concord, CA 94520-9998

**Re: Comment on February 23, 1993 Work Plan for Monitoring
Well Installations at 4411 Foothill Blvd., Oakland 94601**

Dear Mr. Kirk:

Our office has received and reviewed the work plan for the installation of two monitoring wells at the above site as provided by GeoStrategies Inc. It is acceptable as a first approach in determining the extent of the soil and groundwater contamination. You may proceed as soon as possible. In addition, you should be preparing a work plan addendum to further investigate soil contamination on your site particularly around the existing underground tanks and pump islands. Given the high concentrations of dissolved gasoline and BTEX being found in monitoring well S-1, additional well(s) will be necessary to define the extent of the groundwater contamination.

You may contact me at (510) 271-4350 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

Barney M. Chan
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
M. Carey, GeoStrategies Inc., 2140 W. Winton Ave., Hayward
CA 94545
S. Hooton, BP Oil Co., 16400 South Center Parkway, Suite 301,
Tukila WA 98188
M. Miller, Chevron USA Products Co., 2410 Camino Ramon, San
Ramon, CA 94583-0804
[Redacted] files *EM*

2-wp4411

Shell Oil Company



P. O. Box 5278
Concord, CA 94520-9998
(510) 675-6165

FEBRUARY 2, 1993

ALAMEDA COUNTY HEALTH CARE SERVICES
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, RM. 200
OAKLAND, CA 94621
ATTN: BARNEY CHAN

SUBJECT: SHELL SERVICE STATION
4411 FOOTHILL BLVD.
OAKLAND, CA 94601

Dear Mr. Chan:

I have reviewed your letter of January 26, 1993. I was in receipt of your letter on February 1, 1993. The letter requested a completed Unauthorized Release Form. Upon review of Shell's file I found a Form-5 that was sent to Alameda County Department of Env. Health previously and I have enclosed an additional copy for your records. A workplan for further investigation will be sent to you under separate cover.

If you have any questions or comments please call me at (510) 675-6168.

Thank you,

D. T. Kirk

D. T. Kirk
Environmental Engineer
Shell Oil Co.

cc: Rich Hiett, RWQCB
Bob Lauritzen, GeoStrategies Inc.

Attachment

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 26, 1993
StID # 113

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

Shell Oil Company
Mr. Dan Kirk
P.O. Box 5278
Concord, CA 94520-9998

**Re: Request for Work Plan for Additional Subsurface Investigation
at Shell Service Station, 4411 Foothill Blvd., Oakland 94601**

Dear Mr. Kirk:

Our office has recently received the January 19, 1993 Well Installation Report from GeoStrategies Inc. detailing the installation of monitoring well, S-1 at the above site. As you are aware, even though limited soil contamination of gasoline, diesel and motor oil was found in soil borings taken from the monitoring well, significant dissolved gasoline, BTEX and motor oil was found in the groundwater sample from S-1. Apparently, this report failed to provide results for total petroleum hydrocarbons as diesel, TPHd. In addition, the semi-volatiles : 2,4-dimethylphenol, 2-methylnapthalene, napthalene, phenol, 2-methylphenol and 4-methylphenol were found in the water sample.

Because of these results, Shell Oil Co. will be required to perform additional subsurface investigation to determine the extent of both soil and groundwater contamination. You are likely aware that both BP and Chevron are undergoing site investigation and remediation. Groundwater gradient on these neighboring sites have shown a westerly and southwesterly gradient on BP and Chevron respectively. Assuming the same gradient as the Chevron site for the Shell site, Chevron's offsite well, C-7, is downgradient to the Shell site. High gasoline and BTEX concentrations have been found in this well in the same order of magnitude as that found in groundwater sample, S-1. It may be premature to implicate Shell as a source for contamination being found in well C-7, but prompt subsurface investigation of Shell's site will clarify how Shell's hydrocarbon plume are migrating. By way of cc, I will be copying Mr. Mark Miller of Chevron and Mr. Scott Hooton of BP on all correspondences with you. I'm sure that Chevron will be hesitant to actively remediate contamination in their well, C-7, until Shell's site has been adequately investigated.

You should continue to monitor well S-1 for TPHg,d, motor oil, BTEX and semi-volatiles on a quarterly basis.

Mr. Dan Kirk
StID #113
4411 Foothill Blvd.
January 26, 1993
Page 2.

Please complete the enclosed Unauthorized Release Form and submit to our office **within 10 days**. Please provide a workplan addendum to perform further subsurface investigation **within 45 days** of receipt of this letter.


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

Sincerely,



Barney M. Chan
Hazardous Materials Specialist

enclosure (Mr. Kirk)

cc: G. Jensen, Alameda County District Attorney Office
R. Hiatt, RWQCB
M. Carey, GeoStrategies Inc., 2140 W. Winton Ave., Hayward,
CA 94545
S. Hooton, BP Co., 16400 South Center Parkway, Suite 301,
Tukila WA 98188
M. Miller, Chevron USA Products Co., 2410 Camino Ramon, San
Ramon, CA 94583-0804
E. Howell  Files, Chief, Hazardous Materials Division

wpadd-4411



GeoStrategies Inc.
 Environmental Consulting,
 Engineering and Geologic Services

RC 972
 ST 10 113

Letter of Transmittal

Date: 12/8/92

From: Geo Strategies Inc.
 To: Alameda County - Zone 7
80 Swan Way Room 200
OAKLAND, CA. 94621
Environmental Health HAZMAT

Project No: 7681
 Subject: Well Completion Report
Shell Service Station
4411 Foothill Blvd.
Oakland, Ca. 94601

The following items are: Enclosed

Sent Separately via _____

Date	Description	No. of Copies
<u>12/7/92</u>	<u>Well Completion Report -</u>	<u>1</u>

These are transmitted:

- At you request
- For your action
- For your approval
- For your files
- For your review
- For your information
- Preliminary
- _____

Comments:

ATTN: Mr. Tom Peacock

Janet J. Kelly
 (Signed)

2140 W. Winton Avenue, Hayward, CA 94545
 (510) 352-4800 - Fax (510) 783-1089

601 University Avenue, Sacramento, CA 95825
 (916) 568-7500 - Fax (916) 568-7504

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

November 4, 1992
STID # 113

Shell Oil Company
Attn: Mr. Dan Kirk
P.O. Box 5278
Concord, A 94520-9998

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: Evaluation of Workplan for Installation of One Monitoring
Well at Shell Service Station, 4411 Foothill Blvd.,
Oakland 94601

Dear Mr. Kirk:

Please be aware that the new contact within our office handling the oversight of this site is the undersigned Hazardous Materials Specialist. I have received and reviewed the October 15, 1992 workplan for the installation of one monitoring well at the above site as prepared by GeoStrategies Inc. This workplan is acceptable and may proceed with the following conditions:

1. Our office requests that the location of the well be within ten feet of the former waste oil tank in the assumed downgradient direction, namely westerly. Prior to drilling the well please provide a map showing the new well location for our office's approval.
2. Soil samples should be taken at every five foot interval during the drilling of the monitoring well. These samples will be field screened for potential submission for laboratory analysis. In addition to those borings which give high screened readings or appear contaminated, you should also run one sample from within the capillary fringe zone for the appropriate compounds.
3. If any detectable semi-volatile compounds are found in the soil sample taken at approximately 11 feet, you will be also required to run semi-volatiles analysis on the groundwater sample. Please notify our office within 48 working hours prior to actual well installation in the event we choose to witness this activity. You may contact me at (510) 271-4350 should you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: R. Hiett, RWQCB
James & Walter Watters, 600 Caldwell Rd., Oakland, CA 94611
E. Howell, files WP-4411FtH1

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

August 27, 1992
STID 113

Shell Oil Co.
ATTN: Dan Kirk
P.O.Box 5278
Concord, CA 94520-9998

RE: Marvin Shell, 4411 Foothill Blvd., Oakland, CA 94601

Dear Dan Kirk,

This office has received and reviewed your letter dated August 19, 1992 concerning the above site. You acknowledge that a soil/groundwater investigation is required and you cite the following mentioned document. In recently reviewing the files for the above site, this office noted that the laboratory results for the native soil samples collected from beneath the tank, the soil samples collected from the excavated soil, and the numerous holes in the tank as reported by our inspector during the removal reveal inconsistent results. Furthermore, the 8270 analysis was not done at all, although a requirement for waste oil tanks.

According to the Regional Water Quality Control Board's **Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks**, if there are nondetectable results in the native soil when obvious contamination was present in the backfill, an assessment of the site in accordance with the factors in **Table 3**, of the above guidelines, must be completed and submitted to the Regulatory Agencies for evaluation (Please refer to the attached Table 3). Please respond to the questions in Table 3 and submit it to this office **within 45 days** of the receipt of this letter.

Thank you for your cooperation. If you have any questions or comments, please contact this office at (510) 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Richard Hiett, RWQCB
James and Walter Watters, 600 Caldwell Rd., Oakland, 94611

Files

Shell Oil Company



AUGUST 19, 1992

92 AUG 21 4:10:22

P. O. Box 5278
Concord, CA 94520-9998
(510) 675-6165

ALAMEDA COUNTY HEALTH CARE SERVICES
DEPARTMENT OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS DIVISION
80 SWAN WAY, RM. 200
OAKLAND, CA 94621
ATTN: THOMAS PEACOCK

STID 113

SUBJECT: SHELL SERVICE STATION
4411 FOOTHILL BLVD.
OAKLAND, CA

Dear Mr. Peacock:

This letter has been prepared in response to your letter to Shell Oil Company dated June 25, 1992 regarding the subject site. In your letter, you requested a Work Plan for further investigation based on a review of the technical report prepared by GeoStrategies Inc., dated March 26, 1992.

Based on the "Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites (Aug. 10, 1990)" a soil/groundwater investigation is required if an obvious system failure is discovered. It is our opinion that the collection of soil samples from the waste oil excavation represents a soil investigation in as much as would the collection of soil samples from a soil boring.

The holes observed in the tank and the Oil and Grease concentrations detected in the backfill (130 ppm) are consistent with an obvious system failure. However, soil remediation was completed by the excavation and removal of the contaminated backfill. The collection of soil sample SW-1 at a depth of 11 feet below the ground surface (within the first two feet of native soil) verified the effectiveness of our remedial efforts. Since Petroleum Hydrocarbons were not detected in the soil sample collected during this investigation, we believe we have satisfied the requirements of the RWQCB Guidelines and that no further work is warranted.

Therefore, Shell Oil Company respectfully requests that Alameda County Health Agency Division of Hazardous Materials recommends case closure for this project.

Very truly yours,

D. T. Kirk

D. T. Kirk
Area Environmental Engineer
Shell Oil Co.

cc: Rich Hiatt, Regional Water Quality Control Board
John Werfal, Gettler-Ryan Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program

RAFAT A. SHAHID, Assistant Agency Director

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

June 25, 1992

Stan Roller
Shell Oil Co.
P.O. Box 4023
Concord, CA 94524

Re: 4411 Foothill Blvd., Oakland, CA 94601
STID # ~~44113~~

Dear Stan Roller:

This office has reviewed the Waste Oil Tank Removal Observation Report dated March 26, 1992 by GSI on the above site. The 130 ppm Oil & Grease found in 1 sample would require a groundwater monitoring well and a groundwater investigation. Furthermore, the inspector, Dennis Byrne of this office, noted numerous holes, especially in the upper portion of the tank, during its removal on February 5, 1992. A workplan is required to be submitted to this office within 60 days. Attached is a sample format for a workplan. You will need to have monitoring wells installed as part of your plan.

Also attached is a format which is required by the Regional Water Quality Control Board for site closure. This format should be considered and followed early in the investigation in order to expedite site closure.

If you have any questions please contact this office, at 271-4530.

Sincerely,

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Richard Hiett, RWQCB
James & Walter Watters, 600 Caldwell Rd., Oakland, 94611

File

DATE: 3/9/92

TO : Local Oversight Program

FROM: ~~RON DW CARZ~~

SUBJ: Transfer of Eligible Oversight Case

Site name: MARVIN'S SHELL STATION

Address: 4411 Foothill Blvd City Oakland Zip 94601

Closure plan attached? Y N DepRef remaining \$ 9500

DepRef Project # 5008 STID #(if any) 113

Number of Tanks: 4 removed? Y N Date of removal 2/5/92

Leak Report filed? Y N Date of Discovery 2/5/92?

Samples received? Y N Contamination: soil

Petroleum Y N Types: Avgas Jet leaded unleaded Diesel
fuel oil waste oil kerosene solvents

Monitoring wells on site Monitoring schedule? Y N

Briefly describe the following:

Preliminary Assessment NA

Remedial Action none yet tank just pulled last month

Post Remedial Action Monitoring none yet, but will need MWDs

Enforcement Action review lab results submitted 2/24/92

Comments: No DLR form in file → Evacuated soil samples were all ND
received Stockpile contamination low - low/med hydrocarbons 52 ppm,
high hydrocarbons 14 ppm, TOG 130 ppm, B 11 ppb, T 8 ppb, E 12 ppb,
X 18 ppb. They will need to submit a work plan.

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

Site ID# _____ Site Name shell station Today's Date 2/5/92
 Site Address 444 High Street EPA ID# _____
 City Oakland Zip 94601 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? **Y N**
 Hazardous Waste generated per month?

- Inspection Categories:**
- I. Haz. Mat/Waste GENERATOR/TRANSPORTER
 - II. Business Plans, Acute Hazardous Materials
 - III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

- I.A GENERATOR (Title 22)**
- 1. Waste ID * 66471
 - 2. EPA ID 66472
 - 3. > 90 days 66508
 - 4. Label dates 66508
 - 5. Biennial 66493
-
- Manifest**
- 6. Records 66492
 - 7. Correct 66484
 - 8. Copy sent 66492
 - 9. Exception 66484
 - 10. Copies Rec'd 66492
-
- Misc.**
- 11. Treatment 66371
 - 12. On-site Disp. (H.S.&C.) 26189.5
 - 13. Ex Haz. Waste 66570
-
- Prevention**
- 14. Communications 67121
 - 15. Aisle Space 67124
 - 16. Local Authority 67126
 - 17. Maintenance 67120
 - 18. Training 67105
-
- Confin. Agency**
- 19. Prepared 67140
 - 20. Name List 67141
 - 21. Copies 67141
 - 22. Emg. Coord. Trng. 67144
-
- Containers, Tanks**
- 23. Condition 67241
 - 24. Compatibility 67242
 - 25. Maintenance 67243
 - 26. Inspection 67244
 - 27. Buffer Zone 67246
 - 28. Tank Inspection 67259
 - 29. Containment 67245
 - 30. Safe Storage 67261
 - 31. Freeboard 67257

Comments:

Observed removal of one 550 gallon waste oil. Numerous holes were observed in the tanks, particularly on the upper portions.

One soil sample collected from under center of tank at a depth of \approx 11'

One composite sample was collected from the spoils pile.

No water was observed in the excavation.

Standard Waste Oil analysis to be conducted on the sampler.

- I.B TRANSPORTER (Title 22)**
- 32. Applic./Insurance 66428
 - 33. Comp. Cert./CHP Insp. 66448
 - 34. Containers 66465
-
- Manifest**
- 35. Vehicles 66465
 - 36. EPA ID #s 66531
 - 37. Correct 66541
 - 38. HW Delivery 66543
 - 39. Records 66544
-
- Confin's**
- 40. Name/ Covers 66545
 - 41. Recyclables 66800

Rev 6/88

Contact: _____
 Title: _____
 Signature: _____

Inspector: _____
 Signature: O. B. [Signature]

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Telephone Number: (415)

28 October 1991

Irene Guerrero
Robert H. Lee & Associates, Incorporated
900 Larkspur Landing Circle
Suite 125
Larkspur, CA 94939

Subject: Underground Storage Tank Closure at 4411 Foothill Blvd.
Oakland, Project # 6063.10.

Dear Ms. Guerrero:

Enclosed please find two copies of the approved closure plan for the project listed above. This plan is being reissued as per your request. Changes from the original plan are written in red ink. Your attention is drawn to the proposed analytical tests to be run on soil samples collected during the closure. To ensure compliance with Regional Board Guidelines, additional tests were added. Specific tests added include; Heavy Metals, Volatile and Semi-Volatile Organics.

Please request that your contractor, Delta Bay Builders, provides as much notice as possible to this agency and the Oakland Fire Prevention Bureau for scheduling this closure. Please feel free to contact me if you have any questions concerning this matter.

Sincerely,

A handwritten signature in cursive script that reads "Dennis J. Byrne".

Dennis J. Byrne
Senior Hazardous Materials Specialist

cc: Dan Kirk, Shell Oil Company



ROBERT H. LEE & ASSOCIATES, INC.
 ARCHITECTURE ENGINEERING PLANNING
 900 LARKSPUR LANDING CIRCLE, STE. 125, LARKSPUR CA. 94939 * (415) 461-8890
 BRIAN F. ZITA, ARCHITECT JAMES H. RAY, CIVIL ENGINEER

Telecopy/Facsimile Cover Page

DATE: 10/25/91
 TO: Name DENNIS BURNS
 Company ALAMEDA CO. ENV. HEALTH DEPT.
 Fax No. 563-3706
 RE: SHELL STATION: 4411 WOTHILL BLVD, OAKLAND
 JOB #: 6003.10
 FROM: IRENE GUSPARD

ROBERT H. LEE & ASSOCIATES, INC.
 900 Larkspur Landing Circle, Suite 125
 Larkspur, California 94939
 (415) 461-8890 FAX (415) 461-8678
 NO. OF PAGES (INCLUDING COVER) 2

FURTHER INSTRUCTIONS:

DENNIS,
 PER OUR PHONE CONVERSATION ON 10/23
 I AM SENDING YOU WOLLENBERG'S COMP. OF
 GEN. CONTE. TO DO WORK AT THE REFERENCED
 STATION. PLEASE MAIL UPDATED ALAMEDA
 CO. APPROVAL TO MY ATTENTION.

THANKS
Irene

10-24-91

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

JOHN SPOERLE INSURANCE AGENCY
NATIONWIDE INSURANCE
15750 WINCHESTER BLVD, #203
LOS GATOS, CA 95030

COMPANIES AFFORDING COVERAGE

NATIONWIDE INSURANCE

COMPANY LETTER A

COMPANY LETTER B

COMPANY LETTER C

COMPANY LETTER D

COMPANY LETTER E

INSURED

DELTA BAY BUILDERS, INC.
PO BOX 99
ANTIOCH, CA 94509

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED. IN ANY EVENT, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LYR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/YY)	POLICY EXPIRATION DATE (MM/YY)	LIMITS
	GENERAL LIABILITY COMMERCIAL GENERAL LIABILITY CLAIM MADE OCCUP OWNER'S & CONTRACTOR'S HOME				GENERAL LIABILITY PRODUCTS-COMMERCIAL PERSONAL & AUTO EACH OCCURRENCE FIRE DAMAGE (per occurrence) MED. EXPENSES (per person)
	AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS LEASED AUTOS NON-OWNED AUTOS GARAGE LIABILITY				OPERATED UNLTD LIMT BODILY INJURY (per person) BODILY INJURY (per accident) PROPERTY DAMAGE
	EXCESS LIABILITY UMBRELLA FORM OTHER THAN UMBRELLA FORM				EACH OCCURRENCE AGGREGATE
A	EMPLOYEE COMPENSATION EMPLOYER'S LIABILITY	74NC-504386-0003	1-1-91	1-1-92	EMPLOYER'S LIABILITY SICK ACCIDENT SCHEDULED EMPLOYEES DEATH-BENEFIT PER YEAR
	OTHER				

DESCRIPTION OF OPERATION(S) LOCATED AT (INDICATE SPECIAL ITEMS)

Job; Shell Service Station 4411 Foothill Blvd., Oakland, Ca.

CERTIFICATE HOLDER(S)

Robert Lee and Associates
900 Larkspur Landing Ct.
Larkspur, Ca. 94939

WHEREBY ANY OF THE ABOVE DESCRIBED POLICIES IS CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL NOTIFY THE CERTIFICATE HOLDER BY MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER BY MAIL. LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE
John Sporele (408) 393-2000

73A
Cynthia

Shell Oil Company



EAST BAY
MARKETING DISTRICT

P.O. Box 4023
Concord, CA 94524
(415) 676-1414

June 6, 1991

Mr. Ed Howell
Alameda County Department of Env. Health
80 Swan Way Rm. 200
Oakland, CA. 94621

Dear Mr. Howell:

SUBJECT: SHELL SERVICE STATION
4411 Foothill Blvd.
Oakland, CA. 94601

Enclosed are an Unauthorized Release Site Report and Underground Storage Tank Financial Responsibility document for the subject site.

Shell and Alameda County are securing permits for tank removal and replacement.

If you have any questions, please contact Dan Kirk at (415) 675-6134.

Very Truly Yours,

Lisa K. Waters
Lisa K. Waters
Environmental Analyst

cc: T.E. Stepp
M.E. Swillo
J.P. Brastad
D.T. Kirk

69-11117 L-NOC 16

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO	FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25100.7 OF THE HEALTH AND SAFETY CODE.
REPORT DATE 0 M 6 M 0 D 4 D 9 Y 1 Y	CASE #	SIGNED _____ DATE _____

REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Lisa Waters	PHONE (415) 676-1414	SIGNATURE <i>Lisa Waters 6/8/91</i>
	REPRESENTING <input type="checkbox"/> LOCAL AGENCY <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> OTHER _____	COMPANY OR AGENCY NAME Shell Oil Company	
	ADDRESS P. O. Box 4023 STREET		

RESPONSIBLE PARTY	NAME Shell Oil Company <input type="checkbox"/> UNKNOWN	CONTACT PERSON Dan Kirk	PHONE (415) 675-6134
	ADDRESS P. O. Box 4023 STREET	Concord CITY	CA STATE 94524 ZIP

SITE LOCATION	FACILITY NAME (IF APPLICABLE) Shell Station	OPERATOR Marvin Picha	PHONE (415) 536-1680
	ADDRESS 4411 Foothill Blvd. STREET	Oakland CITY	Alameda COUNTY 94601 ZIP
	CROSS STREET High Street	TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> OTHER _____	TYPE OF BUSINESS <input checked="" type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> FARM <input type="checkbox"/> OTHER _____

IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda Co. Dept. of Env. Health	CONTACT PERSON Cynthia Chapman	PHONE (415) 271-4320
	REGIONAL BOARD San Francisco Bay Region WQCB	Rich Hiatt	PHONE (415) 465-4359

SUBSTANCES INVOLVED	(1) Waste Oil	NAME	QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> _____
	(2)		<input type="checkbox"/> UNKNOWN

DISCOVERY/ABATEMENT	DATE DISCOVERED M 2 D 1 D 9 Y 1 Y	HOW DISCOVERED <input checked="" type="checkbox"/> TANK TEST <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> TANK REMOVAL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> OTHER _____ <input type="checkbox"/> NUISANCE CONDITIONS
	DATE DISCHARGE BEGAN M M D D Y Y <input checked="" type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input checked="" type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> CLOSE TANK <input type="checkbox"/> OTHER _____
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 0 M 2 M 2 D 1 D 9 Y 1 Y	

SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER _____	TANKS ONLY/CAPACITY 550 GAL. AGE 25 YRS <input type="checkbox"/> UNKNOWN	MATERIAL <input type="checkbox"/> FIBERGLASS <input checked="" type="checkbox"/> STEEL <input type="checkbox"/> OTHER _____	CAUSE(S) <input type="checkbox"/> OVERFILL <input checked="" type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER _____
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CASE TYPE	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
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CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES
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REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input checked="" type="checkbox"/> OTHER (OT) _____
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COMMENTS	Security permits to replace waste oil tank.
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UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input type="checkbox"/> NO	FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE.
REPORT DATE 0 <u>M</u> 6 <u>M</u> 0 <u>D</u> 4 <u>D</u> 9 <u>Y</u> 1 <u>Y</u>	CASE #	SIGNED: _____ DATE: _____

REPORTED BY	NAME OF INDIVIDUAL FILING REPORT Lisa Waters	PHONE (415) 676-1414	SIGNATURE <i>Lisa Waters 6/5/91</i>	
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER	COMPANY OR AGENCY NAME Shell Oil Company		
	ADDRESS P. O. Box 4023 STREET			

RESPONSIBLE PARTY	NAME Shell Oil Company <input type="checkbox"/> UNKNOWN	CONTACT PERSON Dan Kirk	PHONE (415) 675-6134
	ADDRESS P. O. Box 4023 STREET		

SITE LOCATION	FACILITY NAME (IF APPLICABLE) Shell Station	OPERATOR Marvin Picha	PHONE (415) 536-1680	
	ADDRESS 4411 Foothill Blvd. STREET			
	CROSS STREET High Street	TYPE OF AREA <input checked="" type="checkbox"/> COMMERCIAL <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> RURAL <input type="checkbox"/> RESIDENTIAL <input type="checkbox"/> OTHER	TYPE OF BUSINESS <input checked="" type="checkbox"/> RETAIL FUEL STATION <input type="checkbox"/> FARM <input type="checkbox"/> OTHER	

IMPLEMENTING AGENCIES	LOCAL AGENCY Alameda Co. Dept. of Env. Health	AGENCY NAME	CONTACT PERSON Cynthia Chapman	PHONE (415) 271-4320
	REGIONAL BOARD San Francisco Bay Region WQCB		CONTACT PERSON Rich Hiatt	PHONE (415) 465-4359

SUBSTANCES INVOLVED	(1) NAME Waste Oil	QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN
	(2) <i>gasoline (1/26/93 MW results)</i>	<input checked="" type="checkbox"/> UNKNOWN

DISCOVERY/ABATEMENT	DATE DISCOVERED 0 <u>M</u> 2 <u>M</u> 2 <u>D</u> 1 <u>D</u> 9 <u>Y</u> 1 <u>Y</u>	HOW DISCOVERED <input checked="" type="checkbox"/> TANK TEST <input type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS	
	DATE DISCHARGE BEGAN M M D D Y Y <input checked="" type="checkbox"/> UNKNOWN	METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input checked="" type="checkbox"/> REMOVE CONTENTS <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> CLOSE TANK <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> OTHER	
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 0 <u>M</u> 2 <u>M</u> 2 <u>D</u> 1 <u>D</u> 9 <u>Y</u> 1 <u>Y</u>		

SOURCE/CAUSE	SOURCE OF DISCHARGE <input type="checkbox"/> TANK LEAK <input checked="" type="checkbox"/> UNKNOWN <input type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER	TANKS ONLY/CAPACITY 550 GAL AGE 25 YRS <input type="checkbox"/> UNKNOWN	MATERIAL <input type="checkbox"/> FIBERGLASS <input checked="" type="checkbox"/> STEEL <input type="checkbox"/> OTHER	CAUSE(S) <input type="checkbox"/> OVERFILL <input checked="" type="checkbox"/> RUPTURE FAILURE <input type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> SPILL <input type="checkbox"/> OTHER
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CASE TYPE	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)
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CURRENT STATUS	CHECK ONE ONLY <input checked="" type="checkbox"/> SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) <input type="checkbox"/> CLEANUP IN PROGRESS <input type="checkbox"/> SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> NO FUNDS AVAILABLE TO PROCEED <input type="checkbox"/> EVALUATING CLEANUP ALTERNATIVES
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REMEDIAL ACTION	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input checked="" type="checkbox"/> OTHER (OT)
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COMMENTS	Security permits to replace waste oil tank.
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**ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS DIVISION
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 PHONE NO. 415/271-4320**

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH
 80 SWAN WAY, ROOM 200
 OAKLAND, CA 94621
 Telephone (415) 271-4320

Plans have been reviewed and found to be acceptable and essential to meet the requirements of State and local health laws. Changes to your plans indicated by this permit are to comply with State and local health laws. The project proposed herein is not released for construction until all required building permits for construction. A copy of these accepted plans must be on the job and available to all contractors and craftsmen involved with the project.

Any changes or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Inspection Department to determine if such changes meet the requirements of State and local laws. Prior to this Department at least 48 hours prior to the start of any required inspections:

Removal of Tank Filling

Sampling

Final

Receipt of a permit to work on site in accordance with applicable laws and regulations.

NOT

Cynthia Chapman
 5/7/91

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name MARVIN'S SHELL
 Business Owner MARVIN, PICHA
2. Site Address 4411 FOOTHILL BLVD.
 City OAKLAND Zip 94601 Phone (415) 536-1680
3. Mailing Address P.O. 4023
 City CONCORD Zip 94524 Phone (415) 675-6134
4. Land Owner SHELL OIL COMPANY / DAN KIRK
 Address P.O. BOX 4023 CONCORD City, State CA Zip 94524
5. EPA I.D. No. CAD 981402746
6. Contractor ARMER-NORMAN ASSOCIATES *Delta Bay Builders*
 Address 4561 3RD AV. *Antioch* P.O. Box 99
 City WALNUT CREEK CA, 94596 *94589* Phone (415) 937-8501 *(415) 754-4339*
 License Type ANB ~~CONTR. LIC #~~ 256896 *394634*
7. Consultant ROBERT H LEE & ASSOCIATES
 Address 900 LARKSPUR LANDING CIRCLE #125
 City LARKSPUR Phone (415) 461-8890

8. Contact Person for Investigation

Name DAN KIRK / SHELL OIL CO. Title ENGINEER

Phone (415) 675-6134

9. Total No. of Tanks at facility 4

10. Have permit applications for all tanks been submitted to this office? Yes [] No []

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Tranporter

Name CROSBY & OVERTON INC. EPA I.D. No. CAD # 981961067

Address 8430 AMELIA ST.

City OAKLAND State CA Zip 94621

b) Rinsate Transporter

Name CROSBY & OVERTON INC. EPA I.D. No. _____

Address (SAME AS ABOVE)

City _____ State _____ Zip _____

c) Tank Transporter

Name CROSBY & OVERTON INC EPA I.D. No. _____

Address (SAME AS ABOVE)

City _____ State _____ Zip _____

d) Tank Disposal Site

Name ERICKSON INC. EPA I.D. No. CAD 009466393

Address 255 PARK BLVD

City RICHMOND State CA Zip 94801

e) Contaminated Soil Transporter

Name CROSBY & OVERTON EPA I.D. No. _____

Address (SAME AS ABOVE)

City _____ State _____ Zip _____

12. Sample Collector

Name JOHN WERFEL
 Company GEO STRATEGIES
 Address 240 W. WINTON AV.
 City HAYWARD State CA Zip 94545 Phone (415) 783-7500

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		
550 GAL	WASTE OIL	SOIL / WATER (IF APPLICABLE)	(2) CONFIRMATORY SAMPLES BENEATH TANK: ONE SAMPLE AT EACH END AT NATIVE SOIL / BACKFILL INTERFACE.

14. Have tanks or pipes leaked in the past? Yes [] No [X]

If yes, describe. _____

15. NFPA methods used for rendering tank inert? Yes [] No []

If yes, describe. 30 LBS OF DRY ICE (CO2) FOR EVERY 1,000 GAL OF TANK CAPACITY WILL BE PLACED IN THE TANK.

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name I.T. LABS
 Address 2055 JUNCTION AV.
 City SAN JOSE State CA Zip 95131
 State Certification No. 137

17. Chemical Methods to be used for Analyzing samples

* Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
WASTE OIL: TPH-GAS TPH-DIESEL GCFID OIL & GREASE <small>PCB, PCP, PAH, creosote Cd, Cr, Ni, Pb, Zn</small>	5030, SOIL/WATER 3550, SOIL 3510, WATER	503 D&E, SOIL 503 A&E, WATER 8270 177
CHLORINATED HYDROCARBONS BTX+E	5030, SOIL/WATER	8010 -OR- 8240, SOIL 601 -OR- 624, WATER 8020 or 8240

18. Submit Site Safety Plan

19. Workman's Compensation: Yes No

Copy of Certificate enclosed? Yes No

Name of Insurer REPUBLIC INDEMNITY *Nationwide*

20. Plot Plan submitted? Yes No

21. Deposit enclosed? Yes No

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

* IF ANY OF THESE CONTAMINANTS IS DETECTED, TESTS WILL BE RUN FOR THE FOLLOWING METALS: CADMIUM, CHROMIUM, LEAD & ZINC.

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

Signature of Contractor

Name (please type) Alan Edwards Gomez-Norman & Associates

Signature

Alan E. Gomez

Date

4-22-91

Signature of Site Owner or Operator

Name (please type) Dan Kirk (For Shell Oil Company)

Signature

D. T. Kirk for Shell Oil Company

Date

4/22/91

NOTES:

1. Any changes in this document must be approved by this Department.
2. Any leaks discovered must be submitted to this office on an underground storage tank unauthorized leak/contamination site report form within 5 days of its discovery.
3. Three (3) copies of this plan must be submitted to this Department. One copy must be at the construction site at all times.
4. After approval of plan, notification of at least two (2) working days (48 hours) must be given to this Department prior to removal of tank(s).
5. A copy of your approved plan must be sent to the landowner.
6. Triple rinse means that:
 - a) Final rinse must contain less than 100 ppm of Gasoline (EPA method 8020 for soil, or EPA method 602 for water) or Diesel (EPA method 418.1). Other methods for halogenated volatile organics (EPA method 8010 for soil, EPA method 601 for water) may be required. The composition of the final rinse must be demonstrated by an original or facsimile report from a laboratory certified for the above analyses.
 - b) Tank interior is shown to be free from deposits or residues upon a visual examination of tank interior.
 - c) Tank should be labelled as "tripled rinsed; laboratory certified analysis available upon request" with the name and address of the contractor.

If all the above requirements cannot be met, the tank must be transported as a hazardous waste.

7. Any cutting into tanks requires local fire department approval.

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

ATTACHMENT A
SAMPLING RESULTS

Tank or Area	Contaminant	Location & Depth	Results (specify units)

INSTRUCTIONS

2. SITE ADDRESS

Address at which closure or modification is taking place.

5. EPA I.D. NO.

This number may be obtained from the State Department of Health Services, 916/324-1781.

6. CONTRACTOR

Prime contractor for the project.

7. OTHER

List professional consultants here.

12. SAMPLE COLLECTOR

Persons who are collecting samples.

13. SAMPLING INFORMATION

Historic contents - the principal product(s) used in the last 5 years.

Material sampled - i.e., water, oil, sludge, soil, etc.

16. LABORATORIES

Laboratories used for chemical and geotechnical analyses.

17. CHEMICAL METHODS:

All sample collection methods and analyses should conform to EPA or DHS methods.

Contaminant - Specify the chemical to be analyzed.

Sample Preparation Method Number - The means used to prepare the sample prior to analyses - i.e., digestion techniques, solvent extraction, etc. Specify number of method and reference if not an EPA or DHS method.

Analysis Method Number - The means used to analyze the sample - i.e., GC, GC-MS, AA, etc. Specify number of method and reference if not a DHS or EPA method.

NOTE:

Method Numbers are available from certified laboratories.

18. SITE SAFETY PLAN

A plan outlining protective equipment and additional specialized personnel in the event that significant amount of hazardous materials are found. The plan should consider the availability of respirators, respirator cartridges, self-contained breathing apparatus (SCBA) and industrial hygienists.

19. ATTACH COPY OF WORKMAN'S COMPENSATION

20. PLOT PLAN

The plan should consists of a scaled view of the facility at which the tank(s) are located and should include the following information:

- a) Scale
- b) North Arrow
- c) Property Line
- d) Location of all Structures
- e) Location of all relevant existing equipment including tanks and piping to be removed
- f) Streets
- g) Underground conduits, sewers, water lines, utilities
- h) Existing wells (drinking, monitoring, etc.)
- i) Depth to ground water
- j) All existing tanks in addition to the ones being pulled

rev. 9/88
mam

ROBERT H. LEE & ASSOCIATES, INC.
 900 Larkspur Landing Circle
 Suite 125
 LARKSPUR, CALIFORNIA 94939

LETTER OF TRANSMITTAL

91 MAY 7 AM 11:23

DATE 5-2-91	JOB NO. 6063.10
ATTENTION CYNTHIA CHAPMAN	
RE: SHELL STATION AT: 4411 FOOTHILL BLVD. OAKLAND, CA	

TO ALAMEDA CO. ENV. HLTH DEPT.
80 SWAN WAY, ROOM 200
OAKLAND, CA 94621

WE ARE SENDING YOU Attached Under separate cover via EXEC. COURIER the following items:

- Shop drawings Prints Plans Samples Specifications
 Copy of letter Change order _____

COPIES	DATE	NO.	DESCRIPTION
3		A-1	SITE SAFETY PLAN
1			WORKMAN'S COMPENSATION CERTIFICATE
			CAD
			EPA I.D. #^981402746
3			UNDERGROUND TANK CLOSURE APPLICATION

THESE ARE TRANSMITTED as checked below:

- For approval Approved as submitted Resubmit _____ copies for approval
 For your use Approved as noted Submit _____ copies for distribution
 As requested Returned for corrections Return _____ corrected prints
 For review and comment _____
 EQR BIDS DUE _____ 19 _____ PRINTS RETURNED AFTER LOAN TO US

REMARKS

Waste and Used Oil or Unknown

(All analyses must be completed and submitted)

Per 1990 Regional Board Tri-Regional Guidelines

TPH G	GCFID(5030)	TPH G	GCFID(5030)
TPH D	GCFID(3550)	TPH D	GCFID(3510)
TPH AND BTX&E	8260		
O & G	5520 D&F	O & G	5520 C&F
BTX&E	8020 or 8240	BTX&E	602, 624 or 8260
CL HC	8010 or 8240	CL HC	601 or 624
ICAP or AA TO DETECT METALS: Cd, Cr, Pb, Zn, Ni			
METHOD 8270 FOR SOIL OR WATER TO DETECT:			
PCB*		PCB*	
PCP*		PCP*	
PNA		PNA	
CREOSOTE		CREOSOTE	

*If found, analyze for dibenzofurans (PCBs) or dioxins (PCP)

COPY

SIGNED: Irene Guerrero

If enclosures are not as noted, kindly notify us at once. IRENE GUERRERO

No. 25246



This license is the property of the Registrar of Contractors, is not transferable, and shall be returned to the Registrar upon demand when suspended, revoked, or invalidated for any reason. It becomes void if not renewed.

CONTRACTOR'S LICENSE



Pursuant to the provisions of Chapter 9 of Division 3 of the Business and Professions Code and the Rules and Regulations of the Contractors' State License Board, the Registrar of Contractors does hereby issue this license to:

ARMER/NORMAN & ASSOCIATES

to engage in the business or act in the capacity of a contractor in the following classification(s):

- C-27 LANDSCAPING
- A GENERAL ENGINEERING CONTRACTOR
- B GENERAL BUILDING CONTRACTOR

C-21 Wrecking
Sc-44 Solar

[Signature] (OVER)

Signature of licensee

WITNESS my hand and official seal this
2nd day of April, 1981

[Signature: J. Maloney]

Registrar
of Contractors

Signature of person who qualified
on behalf of the licensee

13L-26 (REV. 8-78)

82084-228 6-78 4H DUP O DRP

Building Quality



HAZARDOUS SUBSTANCES REMOVAL AND REMEDIAL ACTIONS CERTIFICATION

Pursuant to the provisions of Section 7058.7 of the Business and Professions Code, the Registrar of Contractors does hereby certify that the following qualifying person has successfully completed the hazardous substances removal and remedial actions examination.



Qualifier: WILLIAM ALLEN ARMER
 License No.: 256896
 Namestyle: ARMER/NORMAN & ASSOCIATES

WITNESS my hand and official seal this
25TH day of MARCH, 1991
[Signature: David R. Ellis]
Registrar of Contractors

13L-36 (7/86)

This certification is the property of the Registrar of Contractors, is not transferable, and shall be returned to the Registrar upon demand when suspended, revoked, or invalidated for any reason.

A3792

ACORD CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

3/26/91

PRODUCER

Pettit-Morry Co. of Calif.
Post Office Box 2481
Truckee, CA 95734

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

916-582-0200

COMPANY LETTER **A**

Republic Indemnity Co.

INSURED

Armer/Norman & Associates
1561 3rd Ave.
Walnut Creek

COMPANY LETTER **B**

COMPANY LETTER **C**

COMPANY LETTER **D**

CA 94596

COMPANY LETTER **E**

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS	
					EACH OCCURRENCE	AGGREGATE
A	GENERAL LIABILITY	PC979516	4/01/91	4/01/92	GENERAL AGGREGATE	\$
	COMMERCIAL GENERAL LIABILITY				PRODUCTS-COMPI/OPS AGGREGATE	\$
	CLAIMS MADE OCCUR				PERSONAL & ADVERTISING INJURY	\$
	OWNER'S & CONTRACTOR'S PROT.				EACH OCCURRENCE	\$
					FIRE DAMAGE (Any one fire)	\$
					MEDICAL EXPENSE (Any one person)	\$
					COMBINED SINGLE LIMIT	\$
					BODILY INJURY (Per person)	\$
					BODILY INJURY (Per accident)	\$
					PROPERTY DAMAGE	\$
	EXCESS LIABILITY					
	OTHER THAN UMBRELLA FORM					
	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY					
	OTHER					
					STATUTORY	
					\$ 1,000 (EACH ACCIDENT)	
					\$ 1,000 (DISEASE-POLICY LIMIT)	
					\$ 1,000 (DISEASE-EACH EMPLOYEE)	

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS
Per State Statute

CERTIFICATE HOLDER

#19

Alameda County Health Care Agency
Dept of Environmental Health
Hazardous Mat. Division
80 Swan Way, Room 200
Oakland, Ca. 94621

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT. BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

[Signature] 026923000

Shell Oil Company

One Shell Plaza
P. O. Box 2463
Houston, Texas 77252

L. E. Sloan
Vice President
Finance and Information Services

April 23, 1991

I am the chief financial officer of Shell Oil Company, P. O. Box 2463, Houston, Texas 77252. This letter is in support of the use of the financial test of self-insurance to demonstrate financial responsibility for taking corrective action and/or compensating third parties for bodily injury and property damage caused by sudden accidental releases and/or nonsudden accidental releases in the amount of at least \$1,000,000 per occurrence and \$2,000,000 annual aggregate arising from operating underground storage tanks.

Underground storage tanks at the following facilities are assured by this financial test or a financial test under an authorized State program by this owner or operator:

All tanks are assured by this financial test:

See Attachment A for Retail Locations;
See Attachment B for Distribution Locations;
See Attachment C for Manufacturing Locations;
See Attachment D for All Other Locations.

A financial test is also used by this owner or operator to demonstrate evidence of financial responsibility in the following amounts under other EPA regulations or state programs authorized by EPA under 40 CFR Parts 271 and 145:

<u>EPA Regulations</u>	<u>California Amount</u>
Closure (Sec. 264.143 and Sec. 265.143)	\$ -
Post-Closure Care (Sec. 264.145 and Sec. 265.145)	\$ -
Liability Coverage (Sec. 264.147 and Sec. 265.147)	\$ -
Corrective Action (Sec. 264.101 (b))	\$ -
Plugging and Abandonment (Sec. 144.63)	\$ -
Closure	\$140,616,203
*Post-Closure Care	\$110,191,900
Liability Coverage	\$ 18,000,000
Corrective Action	\$ 522,990
Plugging and Abandonment	\$ 633,630
Total	<u>\$269,964,723</u>

*30 Year Post-Closure Care

This owner or operator has not received an adverse opinion, a disclaimer of opinion, or a "going concern" qualification from an independent auditor on his financial statements for the latest completed fiscal year*.

Alternative I

1. Amount of annual UST aggregate coverage being assured by a financial test, and/or guarantee.	\$ 2,000,000		
2. Amount of corrective action, closure and post-closure care costs, liability coverage, and plugging and abandonment costs covered by a financial test, and/or guarantee.	\$ 269,964,723		
3. Sum of lines 1 and 2.	\$ 271,964,723		
4. Total tangible assets*.	\$28,496,000,000		
5. Total liabilities*.	\$12,161,000,000		
6. Tangible net worth* (subtract line 5 from line 4).	\$16,335,000,000		
		Yes	No
7. Is line 6 at least \$10 million?		<u>X</u>	_____
8. Is line 6 at least 10 times line 3?		<u>X</u>	_____
9. Have financial statements for the latest fiscal year been filed with the Securities and Exchange Commission*?		<u>X</u>	_____
10. Have financial statements for the latest fiscal year been filed with the Energy Information Administration?		<u>N/A</u>	_____
11. Have financial statements for the latest fiscal year been filed with the Rural Electrification Administration?		<u>N/A</u>	_____
12. Has financial information been provided to Dun and Bradstreet, and has Dun and Bradstreet provided a financial strength rating of 4A or 5A?		_____	<u>X</u>

*Period ended December 31, 1990.

NOT USED

Alternative II

- | | | | |
|--|----|------------|-----------|
| 1. Amount of annual UST aggregate coverage being assured by a test and/or guarantee. | \$ | | |
| 2. Amount of corrective action, closure and post-closure care costs, liability coverage, and plugging and abandonment costs covered by a financial test, and/or guarantee. | \$ | | |
| 3. Sum of lines 1 and 2. | \$ | | |
| 4. Total tangible assets. | \$ | | |
| 5. Total liabilities. | \$ | | |
| 6. Tangible net worth (subtract line 5 from line 4). | \$ | | |
| 7. Total assets in the U.S. | \$ | | |
| | | <u>Yes</u> | <u>No</u> |
| 8. Is line 6 at least \$10 million? | | _____ | _____ |
| 9. Is line 6 at least 6 times line 3? | | _____ | _____ |
| 10. Are at least 90 percent of assets located in the U.S. (if "No", complete line 11)? | | _____ | _____ |
| 11. Is line 7 at least 6 times line 3 (fill in either lines 12-15 or lines 16-18)? | | _____ | _____ |
| 12. Current assets. | \$ | _____ | |
| 13. Current liabilities. | \$ | _____ | |
| 14. Net working capital (subtract line 13 from line 12). | \$ | _____ | |
| | | <u>Yes</u> | <u>No</u> |
| 15. Is line 14 at least 6 times line 3? | | _____ | _____ |
| 16. Current bond rating of most recent bond issue? | | _____ | _____ |
| 17. Name of rating service. | | _____ | _____ |
| 18. Date of maturity of bond. | | _____ | _____ |
| 19. Have financial statements for the latest fiscal year been filed with the SEC, the Energy Information Administration, or the Rural Electrification Administration? | | _____ | _____ |

I hereby certify that the wording of this letter is identical* to the wording specified in 40 CFR Part 280.95(d) as such regulations were constituted on the date shown immediately below.



Signature

L. E. Sloan

Vice President Finance and Information Services

April 23, 1991

Attachments

*Typographical errors have been corrected; Explanatory footnotes have been added where appropriate.

CERTIFICATION OF FINANCIAL RESPONSIBILITY

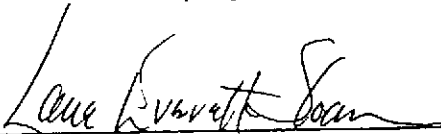
Shell Oil Company hereby certifies that it is in compliance with the requirements of Subpart H of 40 CFR Part 280.

The financial assurance mechanism used to demonstrate financial responsibility under Subpart H of 40 CFR Part 280 is as follows:


Financial test of self-insurance per 40 CFR Sec. 280.95.

The financial test of self-insurance in the amount of \$2,000,000 covers for calendar year 1991 (using year-end financial statements for the latest completed fiscal year ended December 31, 1990), taking corrective action and/or compensating third parties for bodily injury and property damage caused by either sudden accidental releases or nonsudden accidental releases or accidental releases.

Shell Oil Company



By: L. E. Sloan
Vice President Finance and Information Services
April 23, 1991



S. H. Hillman
April 23, 1991