

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
8-14-06

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
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. RO0000415, 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](mailto: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.

### **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](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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
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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. RO0000415, 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 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@accgov.org](mailto:jerry.wickham@accgov.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**

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### **PERJURY STATEMENT**

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**PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

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**UNDERGROUND STORAGE TANK CLEANUP FUND**

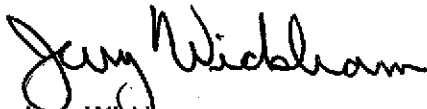
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**AGENCY OVERSIGHT**

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

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DAVID J. KEARS, Agency Director



SENT  
9-14-05

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September 14, 2005

Denis Brown  
Shell Oil Products US  
20945 S. Wilmington Ave.  
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J.T. and Elizabeth Watters  
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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](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



SENT 9-9-05

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September 9, 2005

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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

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](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**

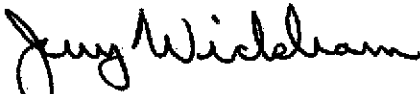
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

**AGENCY OVERSIGHT**

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

Sincerely,



Jerry Wickham  
Hazardous Materials Specialist

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Bill Phua, C/o Jay Phares, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-  
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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](mailto: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.

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### 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  
File

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



SENT  
8-23-05

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. 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," 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](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

Denis Brown and Bill Phua  
August 22, 2005  
Page 3

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



SENT  
6-13-05

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. RO0000415, 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.

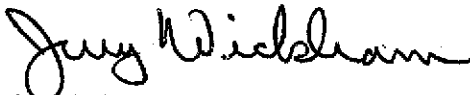
Mr. Denis Brown  
June 10, 2005  
Page 3

**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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



03-08-02  
ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-8577  
(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

C: B. Chan, files  
Mr. J. Loetterle, Cambria Environmental, 1144 65<sup>th</sup> 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 65<sup>th</sup> 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



11-21-01

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:

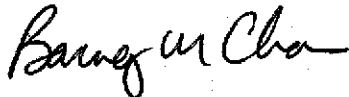
- The Cambria work plan recommends soil excavation action levels of 1000 ppm by the PID or until physical constraints prevent additional excavation. Although I agree with the second half of this statement, PID readings can only serve as an estimate of petroleum contamination. Actual analytical test results 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 65<sup>th</sup> St., Suite B,  
Oakland, CA 94608

CAPap4411FoothillBlvd

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



8.22-01

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 65<sup>th</sup> St., Suite B, Oakland CA 94608

2Q01 4411 Foothill Blvd

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



04-04-01

20415

April 3, 2001  
StID # 113

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

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

**Re: Shell-branded 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. Loettle, Cambria Environmental, 1144 65<sup>th</sup> 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

2-4411Foothill

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



12-12-00

2045

ENVIRONMENTAL HEALTH SERVICES

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

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:

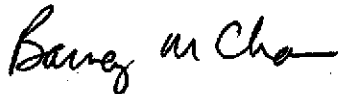
Our office has received and reviewed the November 17, 2000 Cambria Site Investigation Report for the above referenced site. This report, as you are aware, contains the installation report for MW-4 and the investigation of boring SB-4. It also discusses the results of a sensitive receptor and utility 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 65<sup>th</sup> 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 41<sup>st</sup> St., Bld, 13, Suite N, Renton WA 98055-4931

2stat4411 Foothill

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 8-2-2000  
RO# 415

August 1, 2000  
StID # 113

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

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

**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

C: B. Chan, files

Mr. D. Ataide, Cambria, 1144 65<sup>th</sup> 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 41<sup>st</sup> St., Bld. 13, Suite N, Renton WA 98055-4931

Stat4411Foothill

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Sent 1/5/00  
Including cc's

20415

January 5, 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  
Alameda, CA 94502-6577  
(510) 567-6700  
(510) 337-9432

**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.

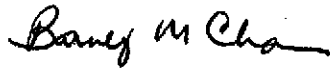
As you are aware, this site in addition to likely having a commingled plume from a nearby service station, has a significant MTBE problem. My November 10, 1999 letter requested that you develop a site conceptual model (SCM) to attempt to understand the release and its potential impact. On your behalf, 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 65<sup>th</sup> St., Suite B,  
Oakland 94608

4411Foothill



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



Sent 11-10-99  
Including cc's

20415

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.

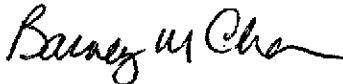
Ms. K. Petryna  
4411 Foothill Blvd., Oakland CA 94601  
StID # 113  
November 10, 1999  
Page 2.

- 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 65<sup>th</sup> St., Suite B, Oakland CA 94608

1MTBE4411Foothill

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



FOA-15

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-3 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

C: B. Chan, files  
Mr. D. Ataide, Cambria Environmental, 1144 65<sup>th</sup> St., Suite B, Oakland CA 94608

Wpap4411

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

Ro# 415

April 30, 1999  
StID # 113

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

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

**Re: 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 65<sup>th</sup> St., Suite B, Oakland 94608

Wprsp-4411 Foothill

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



20415

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  
SID # 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.

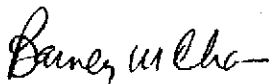
The results of recent monitoring of natural attenuation parameters indicate that conditions do not support aerobic bio-degradation. The dissolved oxygen is low and the oxidation-reduction potential is either negative or less positive than previously noted. Please provide a plan to enhance the dissolved 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  
4411ftbill

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RO#415

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

Ro# 415

November 4, 1996  
StID # 113

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

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

**Re: Request for Tier 2 Risk Assessment for 4411 Foothill  
Boulevard, Oakland CA 94601**

Dear Mr. Granberry:

Our office has received and reviewed the October 28, 1996 Third Quarter 1996 groundwater monitoring report for the above referenced site. Continued elevated TPHg and BTEX has been detected in the three wells since their installation in late 1992 and early 1993.

At this time our office requests that Shell prepare the previously requested Remedial Action Plan (RAP) for the site. Recall, I previously requested a RAP in my March 14, 1995 letter to Mr. Dan Kirk. The RAP was put on hold pending the additional site assessment performed by Pacific Environmental Group (PEG) on June 1995. As part of a RAP you must investigate viable alternatives for remedial action. One alternative is that of relying on natural bioremediation and confirmatory monitoring. As you are aware, this alternative can be used when a site is deemed as a "Low Risk Groundwater Case". This designation requires: removal or stoppage of the ongoing source, adequate site characterization, a stabilized plume, and no significant risk to human health or the environment.

Offsite groundwater migration has occurred from this site. Residential areas lie immediately downgradient to the site. Offsite characterization has not been definitive probably because of the unique site specific geology both on and offsite. The subsurface geology is still not well understood. Significant difference in groundwater elevation is found onsite and offsite at the Chevron station (4265 Foothill Blvd.) across High St. There is a high likelihood of commingled plumes from at least the Shell and Chevron sites. There is less evidence of commingled plumes from the BP station at 4280 Foothill Blvd. since BP station has operated a groundwater extraction system which should have controlled offsite migration as well as decrease the petroleum mass load.



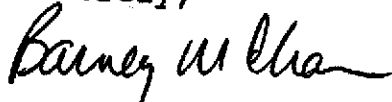
Mr. Jeff Granberry  
4411 Foothill Blvd.  
StID # 113  
November 4, 1996  
Page 2.

In order to verify that this site qualifies as a "Low Risk Groundwater Case", our office will need to be sure that no significant risk to human health exists. In order to do this, it appears that a Tier 2 RBCA evaluation will be necessary for your site. Upon comparison, a conservative evaluation of the highest detected groundwater concentrations at this site exceed the Tier 1 levels for the Groundwater-Vapor Intrusion from Groundwater to Buildings exposure pathway for residential receptor at a 1 in 10<sup>5</sup> (one in ten thousand) excess cancer risk for the chemical compound of benzene. Elevated levels of TPHg also exist, though specific health risk values are not yet accepted for this compound. As part of your risk assessment, please provide the results of your review of the homes in the area. Recall Shell was to perform a survey of the homes downgradient of this site to determine the presence of basements, water wells or other conduits which might affect a risk assessment.

Please submit a work plan for your Tier 2 RBCA evaluation for this site within 45 days or by December 16, 1996.

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

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

c: Mr. N. Scott MacLeod, Cambria Environmental Technologies, 1144  
65th St., Suite B, Oakland CA 94608  
Mr. Philip Briggs, Chevron Products Co., P.O. Box 5004,  
San Ramon, CA 94583-0804

RBCA4411

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0427 - 4265 Foothill Blvd

✓ R0415 - 4411 Foothill Blvd.

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

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

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.

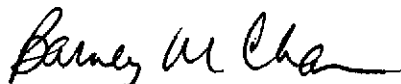
Chevron was to perform a Health Risk Evaluation using the concentration of contaminants being found in well C-4 and their effects on the residences next door. As an initial approach the Risk Based Screening Levels in the ASTM ES-38 document would be used for comparison. Chevron would be in contact with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



R0415

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.

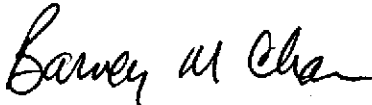
Upon review of the above referenced report, it appears that Shell Oil would like to perform additional site assessment prior to considering the need for a RAP. This assessment would be in the form of a Geoprobe study both onsite and offsite in directions toward the Chevron station and towards monitoring 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



R0415

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 R4P4411

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0415

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.

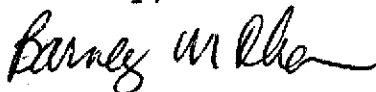
In addition, please perform all subsequent monitoring well events at the same time for all three wells. It would also be advantageous to sample your wells either at the same time or within a short time as when Chevron samples their wells. You should also insure that the groundwater elevation and gradient 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



R0415

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,

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  
E. Howell, files

2-wp4411

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

R0415

November 4, 1992  
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  
Attn: Mr. Dan Kirk  
P.O. Box 5278  
Concord, A 94520-9998

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. Hiatt, 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



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

R0415

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 # ~~4411~~ 113

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0415

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

January 26, 1992  
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. Hiett, 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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



R0415

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

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0415

April 12, 1990

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

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

RE: Underground Tank Issuance of Five Year Permit

Dear Ms. Foster:

An underground tank inspection was conducted at Marvin Picha Shell located at 4411 Foothill Blvd., Oakland, CA, 94601 on January 31, 1990 by Susan Hugo of our department.

The facility at the above mentioned location has been issued a five year permit to operate the four underground tanks.

Enclosed is the five year permit.

If you have any question, please contact Susan Hugo, Hazardous Materials Specialist at (415) 271-4320.

Sincerely,

Edgar B. Howell III, Chief  
Hazardous Materials Division

EBH:SH:sh

cc: Ken Lottinger, Shell Area Manager  
Marvin Picha, Dealer  
Files