

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
9-26-06

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

September 22, 2006

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

Russell J. Bruzzone, Inc.
899 Hope Lane
Lafayette, CA 94549

Montrose Investment Co.
242 Rivera Circle
Greenbriar Marina
Larkspur, CA 94939
Attn: Jim Graham

Subject: Fuel Leak Case No. RO0000469, Shell#13-5885, 6039 College Avenue, Oakland, CA 94618

Dear Mr. Brown, Mr. Bruzzone, and Mr. Graham:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Investigation Report and Second Quarter 2006 Groundwater Monitoring Report," dated August 11, 2006, prepared on your behalf by Cambria Environmental Technology, Inc. The report presents results from the installation of one additional groundwater monitoring well (MW-7) immediately downgradient of the western fuel dispenser. The Work Plan concludes that well MW-7 will be added to the quarterly monitoring program to assess groundwater conditions downgradient of the westernmost dispenser island. ACEH concurs with the proposed addition of well MW-7 to the quarterly groundwater monitoring program. Please present the results in the quarterly monitoring reports requested below.

TECHNICAL REPORT REQUEST

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

- 45 days following End of Quarter - Quarterly Monitoring Reports

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.

Mr. Denis Brown
Mr. Russell Bruzzone
Mr. Jim Graham
September 22, 2006
Page 2

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.

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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
Mr. Russell Bruzzone
Mr. Jim Graham
September 22, 2006
Page 3

AGENCY OVERSIGHT

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

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

Sincerely,


Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
03-22-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
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March 21, 2006

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

Russell J. Bruzzone, Inc.
899 Hope Lane
Lafayette, CA 94549

Montrose Investment Co.
242 Rivera Circle
Greenbriar Marina
Larkspur, CA 94939
Attn: Jim Graham

Subject: Fuel Leak Case No. RO0000469, Shell#13-5685, 6039 College Avenue, Oakland, CA –
Work Plan Approval

Dear Mr. Brown, Mr. Bruzzone, and Mr. Graham:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the document entitled, "Well Installation Work Plan," dated March 3, 2006, prepared on your behalf by Cambria Environmental Technology, Inc. The Work Plan proposes the installation of one additional groundwater monitoring well immediately downgradient of the western fuel dispenser. ACEH concurs with the proposed scope of work and requests that you perform the proposed work and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **May 15, 2006** - Quarterly Monitoring Report for the Second Quarter 2006
- **August 15, 2006** – Well Installation Report and Quarterly Monitoring Report for the Third Quarter 2006

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

Mr. Denis Brown
Mr. Russell Bruzzone
Mr. Jim Graham
March 21, 2006
Page 2

ELECTRONIC SUBMITTAL OF REPORTS

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

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.

Mr. Denis Brown
Mr. Russell Bruzzone
Mr. Jim Graham
March 21, 2006
Page 3

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham, P.G.
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
01-09-06

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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January 9, 2006

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

Russell J. Bruzzone, Inc.
899 Hope Lane
Lafayette, CA 94549

Montrose Investment Co.
242 Rivera Circle
Greenbriar Marina
Larkspur, CA 94939
Attn: Jim Graham

Subject: Fuel Leak Case No. RO0000469, Shell#13-5685, 6039 College Avenue, Oakland, CA

Dear Sirs:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Investigation Report," dated December 14, 2005, prepared on your behalf by Cambria Environmental Technology, Inc. The report presents the results of soil borings completed in September 2005 to assess current on-site conditions in the vicinity of fuel dispensers and USTs and off-site conditions downgradient of the site. Based on these results, the report also recommends the installation of one groundwater monitoring well downgradient of the western fuel dispensers near the location of boring B-2. ACEH concurs with this recommendation and requests that you submit a work plan by **March 10, 2006** to conduct this work. ACEH requests that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **Cross Sections.** The "Subsurface Investigation Report," dated December 14, 2005, includes a discussion of the soil types observed at various depths in borings, depths of samples collected, and depths of various monitoring wells along with an evaluation of conditions. This discussion and evaluation were useful to understanding site conditions but should be supplemented by the use of cross sections. We request that you prepare a minimum of two cross sections for the site with one cross section oriented in the downgradient direction. The cross sections are to include the lateral and vertical extent of soil layers, depths where groundwater was first encountered in borings and the static water levels, observations of free product, staining, or odor, the approximate location of the groundwater table, USTs and dispensers (including the tank pit backfill), and analytical data from soil samples and groundwater samples for each of the borings and wells shown on the cross sections. In

addition, please show the total depth and screen intervals for all wells. Please present these cross sections in the Work Plan requested below.

2. **Table of Well Construction Details.** Please include a table that summarizes well construction details in the Work Plan requested below. The table should include the well ID, date installed, top of casing elevation, total depth, borehole diameter, screened interval, slot size, filter pack interval, filter pack material, bentonite seal interval, and grout seal interval.

TECHNICAL REPORT REQUEST

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

- **February 15, 2006** - Quarterly Report for the Fourth Quarter 2005
- **March 10, 2006** – Work Plan for Monitoring Well Installation
- **May 15, 2006** - Quarterly Report for the First Quarter 2006

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the 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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In order to facilitate electronic correspondence, we request that you provide up to date electronic mail addresses for all responsible and interested parties. Please provide current electronic mail

addresses and notify us of future changes to electronic mail addresses by sending an electronic mail message to me at jerry.wickham@acgov.org.

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.

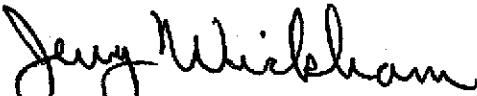
AGENCY OVERSIGHT

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Mr. Denis Brown
January 9, 2006
Page 4

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

Sincerely,



Jerry Wickham, P.G.
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

Matthew Derby
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



SOVT
7-8-05

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

July 8, 2005

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

Russell J. Bruzzone, Inc.
899 Hope Lane
Lafayette, CA 94549

Montrose Investment Co.
242 Rivera Circle
Greenbriar Marina
Larkspur, CA 94939
Attn: Jim Graham

Subject: Fuel Leak Case No. RO0000469, Shell#13-5685, 6039 College Avenue, Oakland, CA

Dear Sirs:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Investigation Work Plan Amendment 3," dated June 30, 2005, prepared by Cambria Environmental Technology, Inc. The work plan proposes advancing nine soil borings to provide additional characterization of soil and groundwater contamination at the site. In correspondence dated May 13, 2005, ACEH previously provided technical comments on "Subsurface Investigation Work Plan Amendment 2." ACEH's May 13, 2005 technical comments have been addressed and the Work Plan is approved for implementation. We request that you perform the proposed work, and send us the reports described below.

TECHNICAL REPORT REQUEST

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

- **November 8, 2005** – Subsurface Investigation Report
- **October 17, 2005** - Quarterly Report for the Third Quarter 2005
- **January 17, 2006** - Quarterly Report for the Fourth Quarter 2005

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

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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, 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

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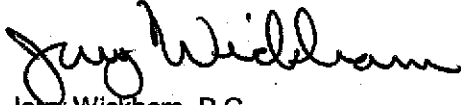
AGENCY OVERSIGHT

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Mr. Denis Brown
July 8, 2005
Page 3

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

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

Matthew Derby
Cambria Environmental Technology, Inc.
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
5-13-05

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

May 13, 2005

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

Dear Mr. Brown:

Subject: Fuel Leak Case No. RO0000469, Shell#13-5685, 6039 College Avenue, Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the subject site and the report entitled, "Subsurface Investigation Work Plan Amendment 2," dated November 30, 2003, prepared by Cambria. The work plan proposes advancing nine soil borings to provide additional characterization of soil and groundwater contamination at the site. Based on staff review of the document referenced above, we request that you address the following technical comment, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. We concur with the proposed soil boring locations, criteria for soil sampling, and analytical parameters for additional characterization of the site. Please see comment 2 regarding the depth of borings at the site and depth-discrete groundwater sampling.
2. The work plan currently proposes that depth-discrete groundwater sampling be conducted in proposed borings SB-2, SB-3, SB-6, and SB-7, which are to extend to a depth of approximately 15 feet below the water table. Based on review of the stratigraphy encountered in monitoring wells MW-5 and MW-6, only fine-grained layers (ML and CL) were encountered within the screened interval of these wells. Therefore, we request that borings SB-2, SB-3, SB-6, and SB-7 be extended to 20 feet below the water table to assess whether more permeable layers may be present at these locations. Please include the results of the investigation in the report 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
- **September 15, 2005** - Subsurface Investigation Report
- **October 17, 2005** - Quarterly Report for the Third Quarter 2005
- **January 17, 2006** - Quarterly Report for the Fourth Quarter 2005

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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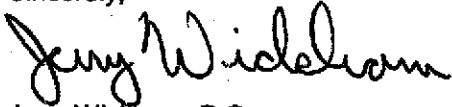
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Mr. Denis Brown
May 13, 2005
Page 3

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

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

Russell J. Bruzzone, Inc.
899 Hope Lane
Lafayette, CA 94549

Montrose Investment Co.
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Larkspur, CA 94939
Attn: Jim Graham

Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



3-24-03

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

March 21, 2003

Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91501-7869

Dear Ms. Petryna:

Subject: Fuel Leak Case No. RO0000469, Shell Service Station, 6039 College Ave.,
Oakland, CA

Alameda County Environmental Health (ACEH) staff has reviewed "Subsurface Investigation Work Plan" dated January 6, 2003, "Site Conceptual Model (SCM) & Well Receptor Survey" dated August 9, 2001, "4th Quarter 2002 Monitoring Report", all prepared by Cambria Environmental Technology. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1) Site Characterization - The lateral and vertical extent of your dissolved contaminant plumes is undefined. Up to 67,100 microgram (ug/l) Total Petroleum Hydrocarbons- Gasoline (TPH-G), 1,650 ug/l Benzene, and 78,000 ug/l Methyl Tertiary-Butyl Ether (MTBE), have been detected in onsite monitoring wells. Up to 59,000 ug/l MTBE had been detected at a property boundary well and up to 4,460 ug/l had been detected at an offsite well indicate that your plume has migrated offsite. Although we concur with the locations of proposed SB-1 and SB-2 the remainder of the boring locations proposed in your work plan are inadequate to define the plume at your site. Please propose additional sampling locations to define the plumes associated with your site in the work plan addendum requested below. Include geologic cross-sections and show soil and groundwater analytical results, utility conduits, well screens, etc., and explain your rationale for additional sampling locations. You may want to consider performing an investigation to quickly define the location of the contaminant plume downgradient from the release site prior to installing the permanent monitoring network. That will allow you to optimize the location and depth of the permanent wells, thereby reducing the cost of the monitoring work. Collection of groundwater samples using a one-time direct push water sampling tool would be appropriate for this investigation.

2) Source Characterization - Up to 78,000 ug/l dissolved phase MTBE been detected in onsite monitoring wells indicating the potential presence of Non Aqueous Phase Liquids (NAPL) in the source area. However, onsite soil samples have never been analyzed for MTBE. We

request that you propose borings to delineate the lateral and vertical extent of soil contamination at your site. Also, rather than analyzing soil samples only at 5 ft. intervals as proposed, we request that you use discretion when selecting samples for analysis, such as considering changes in lithology, areas of obvious contamination, soil/groundwater interface, etc. Include your proposal for defining the lateral and vertical extent of soil contamination in the Work Plan Addendum requested below.

- 3) **Utility Survey and Utility Trench Sampling** - We generally concur with sampling in the utility trenches. However, the information provided to date (plan view) is insufficient to properly assess appropriate sampling locations. Please include cross sections showing utility locations, site stratigraphy, etc., and explain your rationale for sampling locations with the utility trenches in the work plan addendum requested below. Additionally, please explain the changes in TOC (MSL) since November 26, 2002.
- 4) **Migration Control/Source Remediation** - The remedial actions implemented thus far, dual-phase vacuum extraction (DVE) and total fluid extraction by vacuum truck operations (TFE VacOps) do not appear to have resulted in a significant reduction in contaminant concentrations. Please evaluate the effectiveness of your remedial efforts and provide recommendations for future remediation of soil and groundwater contamination at your site in the report requested below.
- 5) **Historical Hydraulic Gradient** - The latest rose diagram depicts gradients from 1st quarter 2000 to 4th quarter 2002 only. Please provide rose diagrams, which include cumulative groundwater gradients in all future reports submitted for this site.
- 6) **Risk Evaluation** - We concur with using a risk-based decision-making approach when evaluating the impacts of contamination at your site and proposing corrective actions. However, you have submitted a Risk-Based Corrective Action (RBCA) analysis before characterization and definition of your contaminant plumes have been completed. Also, TPH pollution was not considered. Additionally, please note that we judge the RBCA process to be inappropriate for MTBE but instead use a resource protection goal of 5 ppb. Risk-based decision-making tools may be an option for residual plume management at MTBE sites that exceed final corrective action cleanup goals following completion of all of the plume definition tasks through Corrective Action Plan (CAP) implementation. A risk-based analysis may be appropriate after you have a validated Site Conceptual Model (SCM) for this site.
- 7) **Groundwater Analyses** - We request that you analyze grab groundwater and monitoring well samples for TPH-G, Benzene, Toluene, Ethyl Benzene, Xylene (BTEX), and Methyl Tertiary-Butyl Ether (MTBE). Also, include the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and the lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC). If any of the latter compounds are detected, and

Ms. Petrynia
March 21, 2003
Page 3 of 3

are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.

Please note, some laboratories may set detection limits for oxygenates that are higher than regulatory reporting limits, particularly for TBA. Additionally, sample preservation techniques have been reported to hydrolyze ethers (e.g., formation of TBA from MTBE hydrolysis) during some laboratory analysis procedures. Please work with your laboratory to meet the regulatory reporting standards for California and to determine appropriate sample preservation techniques.

TECHNICAL REPORT REQUEST

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

April 4, 2003 – "4th Quarter 2002 Monitoring Report"
April 4, 2003 – Workplan Addendum
April 18, 2003 – Evaluation of Migration Control/Source Remediation
60 days after Work Plan approval – Soil and Water Investigation Report
April 30, 2003 – "1st Quarter 2003 Monitoring Report"
July 31, 2003 – "2nd Quarter 2003 Monitoring Report"
October 31, 2003 – "3rd Quarter 2003 Monitoring Report"
January 31, 2004 – "4th Quarter 2003 Monitoring Report"

These reports are being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist
Local Oversight Program

C: Melody Munz, Cambria Environmental Technology, Inc., 1144-65th St., Suite B,
Oakland, CA 94608
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



08-17-01

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

August 16, 2001

Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91501-7869

Dear Ms. Petryna:

Subject: Shell Service Station, 6039 College Ave., Oakland, CA
RO0000469

"2nd Quarter 2001 Monitoring Report" dated July 18, 2001 prepared by Cambria Environmental Technology for the referenced site was reviewed. Only monitoring wells MW-3, MW-5, and MW-6, were sampled during the 2nd Quarter 2001, on May 29, 2001. MW-4 was not sampled due to finding separate-phase hydrocarbons (SPH). MW-3's analyte concentrations, 1,800 Total Petroleum Hydrocarbons-Gasoline (TPPH), 130 ug/l Benzene, <5.0 ug/l Toluene, 84 ug/l Ethylbenzene, 100 ug/l Xylenes (BTEX), and 1,900 ug/l Methyl Tertiary-Butyl Ether (MTBE) (EPA Method 8260), were within the range of recent samples for that monitoring well. MW-5 and MW-6 both were Not Detected (ND) for all contaminants except for MTBE. MTBE (EPA Method 8260) concentrations were 1,300 ug/l and 2,000 ug/l, for MW-5 and MW-6, respectively.

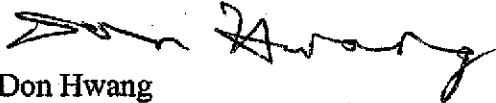
Melody Munz of Cambria brought to my attention that the table of a historical compilation of TRPH/oil and grease concentrations for MW-3 and MW-4 requested, was included in "1st Quarter 2001 Monitoring Report and Remediation Pilot Testing" dated June 14, 2001. The 178 mg/l found on February 11, 2000 in MW-4 was significant. The concentrations may be higher due to positive interferences from hydrocarbons from suspended particles and colloids, and polar, biogenic hydrocarbons. Therefore, the groundwater samples should be filtered and treated with silica gel. If this is done, then the sampling frequency may be reduced. Submit the sample results for the current monitoring event so the frequency may be evaluated. A table of a historical compilation of PCB, PCP, PNA, and creosote (EPA Method 8270) is still needed to determine if their frequency should be reduced.

Ms. Petryna
August 16, 2001
Page 2 of 2

"1st Quarter 2001 Monitoring Report and Remediation Pilot Testing" dated June 14, 2001 also included the results of remediation pilot testing by Cambria to determine the effectiveness of dual-phase vacuum extraction (DVE) and soil vapor extraction (SVE). Although the water recovery rate during DVE was greater than that from previous total fluid extraction by vacuum truck operations (TFE VacOps), TFE VacOps was recommended by Cambria due to the possibility that improper methodology was used. Cambria proposes monthly TFE VacOps, with a reevaluation in the fourth quarter of 2001. Can this method be evaluated sooner?

If you have any questions, call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist

C: Melody Munz, Cambria Environmental Technology, Inc., 1144-65th St., Suite B,
Oakland, CA 94608

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



07-26-01

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

July 25, 2001

Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91501-7869

Dear Ms. Petryna:

Subject: Shell Service Station, 6039 College Ave., Oakland, CA
RO0000469

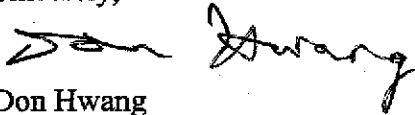
"1st Quarter 2001 Monitoring Report and Remediation Pilot Testing" dated June 14, 2001 prepared by Cambria Environmental Technology for the referenced site was reviewed. Only monitoring wells MW-3, MW-4, MW-5, and MW-6, were sampled during the 1st Quarter 2001. Sampling took place in February 2001. MW-3's analyte concentrations were within the range of recent samples for that monitoring well. MW-3's concentrations were 5,880 Total Petroleum Hydrocarbons-Gasoline (TPPH), 563 ug/l Benzene, <50.0 ug/l Toluene, 282 ug/l Ethylbenzene, and 472 ug/l Xylenes (BTEX), 8,960 ug/l Methyl Tertiary-Butyl Ether (MTBE). MW-4's MTBE (EPA Method 8260) concentration of 20,300 ug/l increased significantly compared to the concentrations found during the last samples, of 4,280 ug/l (hold time exceeded) on November 30, 2000 and 3,950 ug/l (EPA Method 8020) on August 31, 2000 but much less than the concentrations of 31,200 ug/l (hold time exceeded) and 30,300 ug/l (hold time exceeded) prior to those, on May 4, 2000 and February 11, 2000. The concentrations for the other constituents: 16,200 ug/l TPPH, 909 ug/l, <50.0 ug/l, 514 ug/l, and 2,390 ug/l BTEX, were within the range of recent samples. MW-5's concentrations of <50.00 ug/l TPPH, <0.500 ug/l, <0.500 ug/l, <0.500 ug/l BTEX, and 2,440 ug/l MTBE, were within their historical ranges. However, the prior MTBE concentrations were 15,700 ug/l (hold time exceeded, EPA Method 8260) on August 31, 2000 and <2.50 ug/l on February 11, 2000. MW-6's concentrations of <500 ug/l TPPH, <0.500 ug/l, <0.500 ug/l, <0.500 ug/l, <0.500 ug/l BTEX, and 3,910 ug/l MTBE, were within their historical ranges. However, on February 11, 2000, the MTBE concentration was also <2.50 ug/l.

Remediation pilot testing to determine the effectiveness of dual-phase vacuum extraction (DVE) and soil vapor extraction (SVE) was conducted by Cambria on March 15, 2001. Cambria then recommended total fluid extraction by vacuum truck operations (TFE VacOps).

Ms. Petryna
July 25 2001
Page 2 of 2

Was it determined that TFE VacOps would likely be more feasible than DVE or SVE? Can TFE VacOps be evaluated after one month? As requested in our previous letter of January 23, 2001, we still do not have a historical compilation of TRPH and oil and grease concentrations for MW-3 and MW-4. Submit. If you have any questions, call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist

C: Melody Munz, Cambria Environmental Technology, Inc., 1144-65th St., Suite B,
Oakland, CA 94608

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



06-14-01

June 12, 2001

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

Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91501-7869

Dear Ms. Petryna:

Subject: Shell Service Station, 6039 College Ave., Oakland, CA
RO0000469

"4th Quarter 2000 Monitoring Report" dated February 22, 2001 prepared by Cambria Environmental Technology for the referenced site was reviewed. Monitoring wells MW-3, MW-5, and MW-6 were not sampled during the 4th Quarter 2000. Analytes were found within the range of recent quarters for monitoring well MW-4. On November 30, 2000, the following concentrations were identified in groundwater from MW-4: 20,700 ug/l Total Petroleum Hydrocarbons-Gasoline (TPH-G), 525 ug/l Benzene, <50.0 ug/l Toluene, 447 ug/l Ethylbenzene, and 1,570 ug/l Xylenes (BTEX), 2,440 ug/l Methyl Tertiary-Butyl Ether (MTBE) by EPA Method 8020, 4,280 ug/l MTBE as defined by EPA Method 8020, 40,600 ug/l Total Recoverable Petroleum Hydrocarbons (TRPH), 210 ug/l naphthalene, and 89 ug/l 2-methyl naphthalene.

The frequencies for monitoring and sampling of MW-3, MW-5, and MW-6, will be increased to quarterly beginning the 1st Quarter 2001. Before we can decide whether to allow decreasing the frequencies for monitoring and sampling of MW-3 and MW-4 for TRPH and oil and grease as requested, we need a historical compilation of these concentrations to be submitted for review. We will also review the workplan for vapor extraction and dual-phase vacuum extraction tests to assess their suitability for remediation of hydrocarbons in soil and groundwater upon its submission. However, please be advised that vapor extraction would not be feasible for remediating MTBE in groundwater. Therefore, include in the workplan, other proposals to reduce MTBE concentrations in groundwater. If you have any questions, please call me at (510) 567-6746.

Sincerely,

Don Hwang
Hazardous Materials Specialist

C: Stephan Bork, Cambria Environmental Technology, Inc., 1144-65th St., Suite B, Oakland, CA 94608

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



01-24-01
20469

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

January 23, 2001

Karen Petryna
Equiva Services LLC
PO Box 7869
Burbank, CA 91501-7869

Dear Ms. Petryna:

Subject: Shell Service Station, 6039 College Ave., Oakland, CA
StId 3719

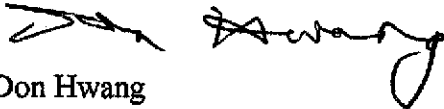
"3rd Quarter 2000 Monitoring Report" dated November 9, 2000 prepared by Cambria Environmental Technology for the aforementioned site was reviewed. Monitoring wells, MW-3 and MW-4, have shown decreases in concentrations since the previous sampling events, which was on February 11, 2000, and on May 4, 2000, respectively. On August 31, 2000, the following concentrations were identified in groundwater from MW-3: 2,560 ug/l Total Petroleum Hydrocarbons-Gasoline (TPH-G), 165 ug/l Benzene, 7.19 ug/l Toluene, 77.6 ug/l Ethylbenzene, and 183 ug/l Xylenes (BTEX), and 4,090 ug/l Methyl Tertiary-Butyl Ether (MTBE). And MW-4 contained: 5,470 ug/l TPH-G, 366 ug/l, <10 ug/l, 296 ug/l, 834 ug/l BTEX, and 3,950 ug/l MTBE. Monitoring wells, MW-5 and MW-6, found MTBE in the August 31, 2000 samples whereas the previous sampling events on February 11, 2000 had all hydrocarbon concentrations including MTBE at below detection limits. On August 31, 2000, monitoring well, MW-5, had MTBE at 13,000 ug/l and monitoring well, MW-6, had MTBE at 4,460 ug/l.

MW-3, MW-4, MW-5, and MW-6, are all downgradient of previous and current underground tanks and pump islands. Note that although MW-3 and MW-4 are closer to the underground tanks and pump islands than MW-5 and MW-6, hydrocarbon concentrations decreased from the previous sampling event. And, MW-5 and MW-6 although further from the underground tanks and pump islands than MW-3 and MW-4, MTBE was found when none was found previously. Does this indicate that the plume is moving offsite? The hydrocarbon concentrations particularly, MTBE, are at levels which need to be closely monitored. Only MW-4 is monitored quarterly.

Ms. Petryna
January 23, 2001
Page 2 of 2

At this time, monitoring frequencies should be increased to quarterly for all recently sampled wells, MW-3, MW-4, MW-5, and MW-6. If groundwater samples from wells, MW-5 and MW-6, continue to exhibit elevated MTBE concentrations, then further delineation of the plume and/or a Corrective Action Plan (CAP) for control of the plume may be required. If you have any questions, please call me at (510) 567-6746.

Sincerely,



Don Hwang
Hazardous Materials Specialist

C: Darryk Ataide, Cambria Environmental Technology, Inc., 1144-65th St., Suite B,
Oakland, CA 94608

File

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0469

July 19, 1999

STID 3719

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

ENVIRONMENTAL HEALTH SERVICES

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

RE: Shell Service Station, 6039 College Avenue, Oakland

Dear Ms. Petryna:

The case file for the referenced site was recently reviewed and the current sampling frequencies evaluated. This review include file entries up to and including the July 14, 1999 Cambria Environmental Technology, Inc. (Cambria) report documenting the sampling and monitoring activities that occurred during the first quarter of 1999.

Elevated concentrations of methyl tert butyl ether (MtBE), among other constituents, were identified in samples collected during the 1st quarter 1999 from well MW-3. MtBE was detected at a reported concentration of 27,600 ug/l, an order-of-magnitude increase from the February 1997 event, but down from the 59,000 ug/l reported for January 1998. Off-site well MW-5 also continues to show elevated concentrations of MtBE (2850 ug/l). Well MW-6, located off-site and formerly on an annual schedule, was not sampled as due to an unspecified accessibility problem.

(Note: Several irregularities appear in tabulated data and associated figures in the 1st quarter 1999 report for this well, and perhaps for others, making case review difficult. For example, the data tables indicate MW-3 had not been sampled since February 1997, yet the report documenting the 1st quarter 1998 sampling indicates that, in fact, it had been. Likewise, Figure 1 of the 1999 report incorrectly portrays the 1998 data instead of the 1999 data.)

At this time, please adhere to the following sampling schedule changes (**changes appear in bold type**):

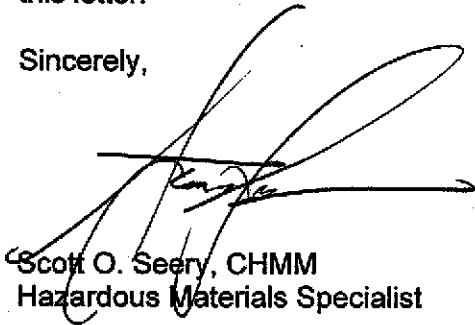
| <u>Well</u> | <u>Schedule</u> | <u>Quarters</u> |
|-------------|-------------------|-------------------------------|
| MW-1 | Discontinued | NA |
| MW-2 | " | " |
| MW-3 | Semiannual | 1st and 3rd |
| MW-4 | Quarterly | All |
| MW-5 | Semiannual | 1st and 3rd |
| MW-6 | Semiannual | 1st and 3rd |

Ms. Karen Petryna
RE: Shell Station, 6039 College Ave., Oakland
July 19, 1999
Page 2 of 2

Please be aware that this revised sampling schedule is effective immediately until further notice. Normal well gauging/monitoring shall continue on a quarterly schedule as before. In addition, all future reports shall include copies of the field sheets that are completed by the sampler at the time the wells are sampled, gauged, or monitored.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Leroy Griffin, Oakland Fire Department
Derek Ataide, Cambria Environmental Technology, Inc.,
1144 - 65th St., Ste. B, Oakland, CA 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0469

May 5, 1999

STID 3719

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

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

RE: Shell Service Station, 6039 College Avenue, Oakland

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Ms. Petryna:

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

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

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

LANDOWNER NOTIFICATION

Re: 6039 College Avenue

May 5, 1999

Page 2 of 2

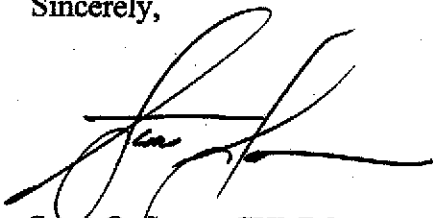
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB
Leroy Griffin, Oakland Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#469

March 18, 1998

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

STID 3719

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

RE: SHELL STATION, 6039 COLLEGE AVENUE, OAKLAND

Dear Mr. Perez:

I just completed review of the February 24, 1998 Cambria Environmental Technology, Inc. 4th quarter 1997 well sampling and monitoring report for the referenced site. This report was received in this office on March 11, 1998. Presented data indicate a marked increase in dissolved fuel components, including MtBE and benzene, in water sampled from well MW-4, located adjacent to the underground storage tank (UST) complex and the only well sampled during the reported period. MtBE concentrations jumped from 31,000 to 78,000 ug/l, and benzene from 150 to 1100 ug/l. There were similar results for the remaining target analytes. These data demonstrate indirect evidence of a recent release associated with the USTs.

The subject sampling and monitoring activities reportedly occurred November 3, 1997, yet this report and these data were received more than four months after-the-fact. This is not acceptable.

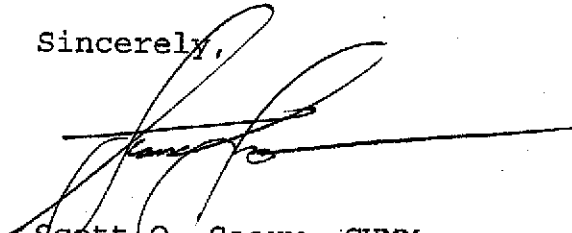
In the future, sample results for any site which clearly indicate a subsequent release or other noteworthy characteristic are to be communicated in a more timely fashion. Section 2652(b) of Title 23, California Code of Regulations, requires such notification of the local agency within 24 hours after an unauthorized release was or should have been detected.

For the subject site, Shell or its representative are to notify the Oakland Fire Department, the local CUPA, in these situations. This timely communication will facilitate whatever action the agency may deem appropriate at the time to abate the problem.

Mr. Perez
RE: 6039 College Ave., Oakland
March 18, 1998
Page 2 of 2

At this time, please transmit to my attention the 1st quarter 1998 data for this site as soon as possible. Please call me at 510/567-6783 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott O. Seery', written over a horizontal line.

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Agency Director
Dick pantages, Chief, Environmental Protection
Larry Blazer, Alameda County District Attorney's Office
Stephen Hill, RWQCB
Leroy Griffin, Oakland Fire Department
N. Scott MacLeod, Cambria Environmental Technology, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO#469

February 19, 1997

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

STID 3719

Aura B. Mattis
Shell Oil Products Company
P.O. Box 4023
Concord, CA 94524

RE: SHELL STATION, 6039 COLLEGE AVENUE, OAKLAND

Dear Ms. Mattis:

You may recall when we met last week I mentioned to you that our records for the College Avenue site reflect that no overspill buckets are installed on the single-wall fuel underground storage tanks (UST). Both the most recent (August 1994) UST permit B forms and the HMBP indicate the absence of such overspill protection.

Clarification of this issue has become paramount in our attempt to explain the occurrence of up 13,000 parts per billion (ppb) MTBE in water sampled August 1996 from *off-site* wells located some 100' from the UST cluster. Such represents an *increase* in concentrations from the previous sampling event. Both phenomena indicate a recent release.

At this time, please comply with the following points:

- 1) Confirm the presence or absence of overspill buckets and *overflow* protection.
- 2) If overspill buckets are installed, submit "as built" plans for their installations, indicate capacities and manufacturer, and indicate the date that this work was completed.
- 3) Submit updated UST Permit Application A and B forms (copies attached) to correctly reflect spill and overflow protection status if applicable.
- 4) Confirm the presence or absence of "striker plates" beneath the access ports of the single wall Owens-Corning FRP product tanks.
- 5) Submit an update to the site HMBP to appropriately reflect the presence of overspill protection if applicable.

Ms. Mattis
RE: 6039 College Avenue, Oakland
February 19, 1997
Page 2 of 2

You may be well advised to review the records for all the Shell stations in Alameda County to ensure that these issues are appropriately clarified and updated where necessary.

Please call me at (510) 567-6783 should you have any questions about the content of this letter. Compliance questions, as well as submittal of your response to the items requested above, should be directed to Pamela Evans of this office. Ms. Evans's phone number is (510) 567-6770.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

enclosures

cc: Mee Ling Tung, Agency Director
Gordon Coleman, Acting Chief, Environmental Protection
Larry Blazer, Alameda County District Attorney's Office
Kevin Graves, RWQCB
Pamela Evans, ACDEH
Kevin Tinsley, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0469

STID 3719

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

April 12, 1995

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

RE: SHELL STATION, 6039 COLLEGE AVENUE, OAKLAND

Dear Mr. Kirk:

I have completed a review of the case file for this site, up to and including the December 19, 1994 Weiss Associates (WA) 4th quarter 1994 sampling report. The cited report, as well as those WA reports issued since October 1993, have recommended continued sampling of all wells for the presence of dissolved hydrocarbons. However, a previous WA report dated January 3, 1994 which documents the results of the off-site soil and ground water study, indicates that a feasibility study, applicable clean-up levels, and a schedule for future work at the site would be forthcoming. To date, such has not been presented.

As has been indicated in past correspondence from this office, a corrective action plan (CAP), pursuant to Article 11, *Corrective Action Requirements*, Title 23, California Code of Regulations, is required for this site. Please develop and submit a comprehensive CAP for this site, incorporating, among other elements, the referenced feasibility study and applicable clean-up levels.

The requested CAP is due within 60 days of the date of this letter, or by June 12, 1995.

Please call me at 510/567-6783 should there be any questions or if I may be of assistance.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Agency Director
Gil Jensen, Alameda County District Attorney's Office

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0469

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

STID 3719

October 28, 1992

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

RE: SHELL SERVICE STATION, 6039 COLLEGE AVENUE, OAKLAND

Dear Mr. Kirk:

This office is in receipt and has completed review of the October 12, 1992 Weiss Associates (WA) subsurface work plan describing the proposed scope of work for the continued off-site environmental investigation associated with the referenced site. This most recent WA work plan was submitted in response to the September 24, 1992 correspondence from this office.

The October 12, 1992 WA work plan has been accepted with the following conditions:

- 1) Proposed locations for initial soil borings advanced on the adjoining Olund property appear appropriate. Please bear in mind, however, that the purpose for these borings is to define the limit of subsurface contamination associated with the release at the referenced Shell site. Should one or more of the proposed borings advanced at the adjoining property identify the presence of significant subsurface soil contamination, additional "step-out" borings are to be advanced to the point where the contamination limit is reasonably delineated. In terms of "time and material" costs, it is strongly suggested that, should additional borings appear prudent, such work commence while the drill rig is already mobilized at the site.
- 2) All soil samples chosen for analyses from borings advanced during this phase of the investigation, are to be analyzed for the complete suite of compounds identified previously under item 4 of the cited September 24, 1992 correspondence from this office.
- 3) Ground water sampling shall not occur the same day a well is drilled, constructed, or developed, no matter the well development or construction method. A minimum period of 24, and preferably 72, hours must pass between well development and the first purge/sampling sequence. However, the merit of WA's proposed well construction and development sequence appears acceptable.

Mr. Dan Kirk
RE: 6039 College Avenue, Oakland
October 28, 1992
Page 2 of 3

Your attention is directed to Article 11, Corrective Action Requirements, of Title 23, California Code of Regulations (CCR), beginning with Section 2720. This phase of the investigation essentially meets the requirements of a soil and water investigation (SWI) pursuant to Section 2724 et seq. of this article. As a reminder, information obtained during the investigation is to be used to propose a Corrective Action Plan (CAP), which shall include, among other elements, the following:

- o **assessment of the impacts** in accordance with Sec. 2725(e), 23CCR
- o **feasibility study** in accordance with Sec. 2725(f), 23CCR
- o **applicable cleanup levels** in accordance with Sec. 2725(g), 23CCR
- o **proposed schedule** for completion of proposed actions

Shell Oil Company, as well as the consultant's project manager responsible for making the day-to-day calls in the field, should keep in mind that the purpose of all tasks associated with this investigation are meant to be interconnected: the results of each aspect of the investigation are the underpinnings of those following. No one task is to be considered independent of another. Each is a step towards the goal of site investigation and restoration, and it is from this perspective Shell and their agents should be viewing this project.

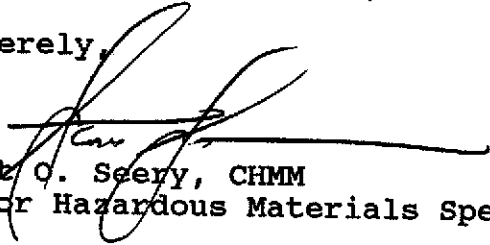
Shell is solely responsible for complying with the laws and regulations of the state. The laws and regulations which address the issue of site investigations and cleanup, in addition to the ground water protection requirements of the San Francisco Bay RWQCB Basin Plan, are clear. Hence, Shell ultimately bears the burden for deciding when, where, or if the scope of work must be expanded to meet their regulatory responsibilities.

Please keep this office closely informed as work progresses, particularly during that portion of the investigation occurring at the adjoining Olund property, so that we may assist Shell with their responsibility in determining the next best appropriate action.

Mr. Dan Kirk
RE: 6039 College Avenue, Oakland
October 28, 1992
Page 3 of 3

Please contact me when the access agreement between Mr. Olund and Shell Oil Company has been signed and work is scheduled to begin. I may be reached at 510/271-4530, or -4320.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency director
Gil Jensen, Alameda County District Attorney's Office
Rich Hiett, RWQCB
Larry Olund
Montrose Property Management
Joseph Theisen, Weiss Associates
Ed Howell - files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

STID 3719

September 24, 1992

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

R0469

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

RE: SHELL SERVICE STATION, 6039 COLLEGE AVENUE, OAKLAND

Dear Mr. Kirk:

This letter follows Tuesday's (September 22) telephone conversation and my review of the September 14, 1992 Weiss Associates (WA) work plan submitted in response to the August 19, 1992 correspondence from this office. This work plan is the second in a series of such plans and, to date, the third WA document to be submitted on Shell's behalf following the initial June 2, 1992 request from this office that the scope of the environmental investigation be expanded at this site.

WA's first document, dated June 30, 1992, was submitted in response to the Department's June 2 request for additional work at the site. This WA document concluded that no additional assessment was required, and that the "vertical" extent of contamination was fully defined. No mention of the adequacy of horizontal delineation was discussed.

In a subsequent letter from this office dated July 20, 1992, the Department outlined those areas proximal to the site which were not yet adequately evaluated for impacts associated with the releases from the underground storage tanks at this site: specifically, soil and ground water in the area southeast through west of well MW-4. Further, the requirement to evaluate potential impacts to the adjoining property to the south was indicated.

In response, WA submitted a limited work plan dated August 17, 1992. No permanent off-site wells were proposed downgradient (west-to-southwest) of the site, only temporary soil borings and grab water samples. All borings were to be destroyed following the collection of these one-time samples. The proposal went on to indicate that should dissolved hydrocarbons be discovered beneath Claremont Avenue "...WA will evaluate the need for a crossgradient well west of the site." This work plan was not accepted based on its limited scope. No assessment of the Olund property to the south was proposed.

Mr. Dan Kirk
RE: 6039 College Avenue, Oakland
September 24, 1992
Page 2 of 5

Following review of the August 17 WA work plan, we discussed by telephone *in detail* on August 19 why the referenced work plan was unacceptable as submitted. We discussed the need for permanent off-site well points to verify gradient and continually monitor for the presence of contaminants in ground water. We also discussed the rationale behind the Department's requirement for assessment of the Olund property: up to 110,000 parts per million of petroleum-based contaminants were discovered in soil between a depth of 15 and 23 feet below grade in those wells and borings advanced on the Shell site directly adjacent to the Olund property. The extent that this contamination has impacted the Olund property has not been evaluated, a task Shell is required to fulfill. You described the difficulty Shell had experienced in the past gaining access to the Olund property. I indicated that I would try to contact Mr. Olund to assist Shell in accessing the property.

The outcome of our discussion was memorialized in the August 19, 1992 correspondence from this office. This letter **specifically** defined the areas needing further evaluation, as we discussed earlier that day. Further, this letter also advised Shell that the information gathered by this investigation is to be used in the development of a viable Corrective Action Plan (CAP), pursuant to Article 11, Title 23, California Code of Regulations.

In the wake of a telephone conversation I shared with Mr. Olund, Mr. Gerard Glass, Mr. Olund's attorney, submitted a letter dated September 1, 1992, indicating that Mr. Olund was ready and willing to cooperate with the Department in the investigation. You confirmed during our telephone conversation September 22 that you had received a copy of this letter.

WA's latest work plan, dated September 14, 1992, submitted in response to the Department's August 19 letter, still fails to meet the required objectives. During our September 22 conversation, we (again) discussed the rationale behind the required scope work at the site. As we further discussed, the Department will accept the September 14 work plan **only** under the conditions presented below:

- 1) An access agreement shall be entered into by Shell Oil Company and Mr. Olund or his agent to allow Shell to access the referenced Olund property, 6074 and 6076 Claremont Avenue, Oakland, to investigate soil and ground water underlying that site.

Mr. Dan Kirk
RE: 6039 College Avenue, Oakland
September 24, 1992
Page 3 of 5

- 2) A minimum of three (3) borings, the locations of which are to be approved by this Department in advance of initiating work, are to be advanced into the referenced Olund property in locations adequately spaced and appropriately placed as to clearly define the extent of subsurface soil contamination underlying this site. Should significant soil contamination be discovered in any of these borings, a decision will be made by this Department whether one or more of these borings should be completed as ground water/vapor extraction or monitoring wells.

Please submit a map showing the locations of the proposed borings, and the locations of structures and other improvements on this site.

- 3) Soil samples shall be collected from all borings, including those completed as monitoring wells, at a minimum 5 foot intervals, significant changes in lithologies, and where field screening techniques (e.g., PID/OVA, odors, staining, etc.) indicate the presence of contamination. All samples exhibiting "hits" during field screening shall be analyzed. Should field screening techniques fail to identify contamination in a given boring, that sample collected from the saturated/ unsaturated interface zone will be analyzed.
- 4) Soil samples submitted for analysis shall be analyzed for the following suite of compounds:
- o TPH as gasoline and diesel (DHS/LUFT method)
 - o Total oil and grease (Method 5520 series)
 - o BTEX (Method 8020 or 8240)
 - o Semivolatile organic compounds (Method 8270)
- 5) Water samples collected from all new wells, including "grab" samples, in addition to all future samples collected from current wells MW-3 and -4, shall adhere to the suite of analytes described in item 4, above. A reduction in target compounds being sought will be based on the results of analyses over the next several monitoring events. Please note that semivolatile organic compounds have never been sought, contrary to RWQCB requirements for waste oil tank investigations.

Mr. Dan Kirk
RE: 6039 College Avenue, Oakland
September 24, 1992
Page 4 of 5

- 6) Well seals are to be allowed to set up a minimum of 72 hours prior to development should mechanical development methods be used. Purging/sampling shall not occur for a minimum of 24 hours, and preferably 72 hours, after well development.

Additionally, in review of the documents submitted since this investigation began in 1990, the following omissions were noted:

- A) Initial and stabilized depths-to-water (DTW) encountered in well borings MW-1 through -5 are not clearly defined in the provided boring logs. Please submit any other data that may clarify this information.
- B) Copies of laboratory report sheets and sample chain-of-custody forms are missing in reports documenting the initial results for samples collected from borings B-1 through -6 and wells MW-1 through -5. Please submit this information.

Please submit the boring location map for the Olund property requested in item 1, above. This map is expected within 15 days of the date of this letter. Upon approval from this office, work may commence at that site, provided, of course, Shell has entered into an access agreement with Mr. Olund or his agent. The Department expects that such an agreement will be signed by both affected parties within 30 days of the date of this letter. Shell shall supply this office with a copy of the signed agreement as soon as it has been finalized.

The information requested in items A and B, above, shall be submitted in a timely fashion.

Please call me at 510/271-4530 should you have any additional questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health
Gil Jensen, Alameda County District Attorney's Office

Mr. Dan Kirk
RE: 6039 College Avenue, Oakland
September 24, 1992
Page 5 of 5

cc: (con't.)

Rich Hiett, RWQCB
Aaron Stewart, Claremont Sheetmetal
Larry Olund
Joseph Theisen, Weiss Associates
Ed Howell - files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0469

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

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

August 19, 1992

STID 3719

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

RE: SHELL SERVICE STATION, 6039 COLLEGE AVENUE, OAKLAND

Dear Mr. Kirk:

This letter follows today's telephone conversation and my reconnaissance of the subject site. As we discussed, the August 17, 1992 Weiss Associates (WA) work plan does not adequately address the scope of work requested by this department for the continued evaluation of soil and ground water contamination associated with the release or releases at the subject site. The scope of this required additional work was outlined in correspondence from this department dated July 20, 1992.

At this time, please submit an amended work plan which addresses the following points:

- 1) A **appropriate** number of permanent well points are to be installed west/southwest of MW-3 to continually evaluate ground water gradients and detect the presence of contamination.
- 2) Soil borings are to be advanced south, southwest and southeast of well MW-4 to evaluate the extent of contamination extending onto the adjoining property. One or more of these borings should be considered for conversion into monitoring wells.

As we further discussed, the property directly south of the subject site is not Claremont Sheetmetal as I had originally understood through my reading of the reports submitted to date. The property adjoining the site actually lies between the Shell station and Claremont Sheetmetal. Structures on this site have the street addresses of 6074 and 6076 Claremont Avenue.

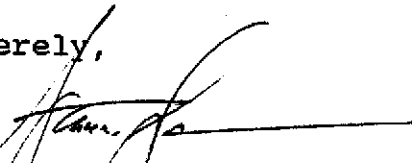
This amended work plan will be expected within 15 days of the date of this letter. Please copy this department and RWQCB on any correspondence between Shell and the adjoining property owner regarding access for the installation of the requisite borings.

Mr. Dan Kirk
RE: Shell Station, 6039 College Avenue, Oakland
August 19, 1992
Page 2 of 2

Please recognize that the focus of this investigation is to evaluate the extent of contamination at this and adjoining sites. Such information is to be used to devise the best means to affect a timely and cost effective cleanup, both soil and ground water. Plume control and product recovery should be at the top of Shell's list of priorities. Data gaps standing in the way of these goals must be identified and addressed quickly in route to the development of a Corrective Action Plan (CAP), required pursuant to Article 11 of Title 23, California Code of Regulations.

Please call me or Tom Peacock at 510/271-4530 should you have any questions.

Sincerely,



Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director
Gil Jensen, Alameda County District Attorney's Office
Rich Hiatt, RWQCB
Aaron Stewart, Claremont Sheetmetal
Larry Olund, 6023 College Avenue, Oakland 94613

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

R0469

RAFAT A. SHAHID, Assistant Agency Director

July 20, 1992

STID # 3719

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

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

RE: SHELL SERVICE STATION, 6039 COLLEGE AVENUE, OAKLAND

Dear Mr. Kirk:

The Department is in receipt of the June 30, 1992 Weiss Associates (WA) letter report summarizing and interpreting the results of the environmental investigation performed to date at the referenced site. The cited WA letter report, submitted on Shell Oil Company's behalf, was in response to a June 2, 1992 request from Mr. Tom Peacock of this office that the environmental investigation at this site be expanded.

Mr. Peacock, following a review of this case which included the May 20, 1992 WA First Quarter 1992 sampling report, concluded that the vertical and horizontal extent of both soil and ground water contamination at this site had not been fully characterized. Unfortunately, the words "and horizontal" were inadvertently omitted from the cited June 2 correspondence. We apologize for this oversight if this omission prompted the WA rebuttal to the Department's request for further work.

However, review of the data generated since the investigation began in January 1990 clearly indicates that the extent of soil and ground water contamination stemming from the unauthorized release(s) at this site has not been adequately defined, particularly to the west and southwest of the site. Harding Lawson Associates (HLA) first realized the need for additional work following the completion of the initial six (6) borings and three (3) monitoring wells at the site. The results of this work were documented in their April 13, 1990 report.

In this report, **severe** (up to 110,000 parts per million [ppm] of total petroleum hydrocarbons [TPH]) latent soil contamination was discovered in the 19-23 foot depth of borings B-3 and -6, and the 15-21 foot depth of wells MW-3 and -4. Significant (170 ppm) TPH was discovered at the 18.5 foot depth of boring B-4, advanced through the area of the 1957-era pump islands. Both MW-3 and B-4 are at the western edge of the site, fronting along Claremont Avenue. Ground water was initially encountered at depths ranging from 16-18 feet below grade (BG).

Mr. Kirk
RE: Shell Station, 6039 College Avenue
July 20, 1992
Page 2 of 3

Ground water sampled from three of the four wells, particularly wells MW-3 and -4, was also significantly impacted, as evidenced by benzene levels up to 320 parts per billion (ppb) in MW-3, and TPH as gasoline up to 4,700 ppb (MW-3).

As a result of this initial data, HLA proposed to construct two (2) additional wells on the adjoining property, south and southwest of the current underground storage tank (UST) location and area of the most severe soil contamination (B-3/MW-3,-4). The report indicated that these wells would be installed during the second quarter of 1990.

The July 10, 1990 HLA second quarter 1990 report again documented the high concentrations of dissolved petroleum hydrocarbon compounds in ground water (up to 40,000 ppb TPH), particularly in those two wells south and west of the current UST pit, MW-3 and -4. The report concluded by proposing the installation of not two, but three (3) wells: an additional well was to be sited at the western edge of Claremont Avenue, approximately 90 feet west of the present UST pit. The report proposed that all three wells would be installed during the next quarter.

This three-well proposal would appear again in the next three HLA quarterly reports (October 12, 1990; January 9 and April 9, 1991). This HLA well installation proposal was never implemented, even though the scope of work was approved by this Department on December 2, 1990.

The July 1, 1991 HLA second quarter 1991 report concludes by modifying the original (and approved) scope of work proposed in the four previous HLA reports, proposing instead the installation of not three, but one (1) off-site well. This well was to be installed during the subsequent (3rd) quarter, and be constructed approximately 60 feet southwest of the subject site, on property apparently owned and operated by Claremont Sheetmetal.

The October 10, 1991 HLA third quarter 1991 report (revised October 22, 1991) indicates that this off-site well, designated MW-5, was eventually installed approximately 80 feet southwest of the site on the Claremont Sheetmetal property. Minor soil contamination was discovered in soil sampled at the 16 foot depth. Detectable concentrations (80 ppb) of TPH were also found in ground water initially sampled from this well. Subsequent analyses of ground water collected from this well during March 1992 have been nondetectable for target compounds.

Mr. Dan Kirk
RE: Shell Station, 6039 College Avenue
July 20, 1992
Page 3 of 3

Review of historical ground water gradient information, compiled from eight elevation measurements collected between February 1990 and March 1992, indicates that, although gradient has been shown to be primarily to the southwest, there is a strong westerly component to the flow.

Such gradient data, in addition to the soil and ground water sampling data accumulated to date, strongly support the need to extend the scope of the ground water and soil investigation to the west and southwest of boring B-4 and well MW-3. Further, additional soil borings are needed south, southwest and southeast of MW-4 to fully evaluate the extent of soil contamination extending onto the adjoining property. Such borings should be at a moderate distance from MW-3 (<40 feet).

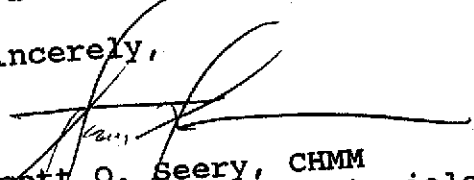
At this time, pursuant to Section 2720 et seq. of Article 11, Title 23, California Code of Regulations, you are hereby directed to submit a work plan tailored to meet the objectives cited above. Data generated during the implementation of this work plan will be used by Shell to propose a Corrective Action Plan (CAP). The CAP shall include, among other elements, those listed in Section 2725(d) et seq. of 23CCR.

The cited work plan is due within 30 days of the date of this letter, or by the close of business on August 19, 1992.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this Department or the RWQCB.

Please call the undersigned or Mr. Peacock at 510/271-4530 should you have any questions about the content of this letter.

Sincerely,


Scott O. Seery, CHMM
Senior Hazardous Materials Specialist

cc: Rafat A. Shahid, Assistant Agency Director, Env. Health
Gil Jensen, Alameda County District Attorney's Office
Tom Peacock, LOP, ACDEH
Rich Hiett, RWQCB
Sandra Malos, SWRCB
Claremont Sheetmetal, 6066 Claremont Ave., Oakland

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0469
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program

RAFAT A. SHAHED, Assistant Agency Director

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

June 2, 1992

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

Re: 6039 College Ave., Oakland, 94618
STID # 3719

Dear Mr. Kirk:

This office has reviewed the First Quarter 1992 Activities as described in a report dated May 20, 1992 by Weiss Associates. It is surprising that fuel had to be bailed from MW4 (1/2nd). There was also significant contamination in MW3. This would indicate that the verticle extent of contamination has not been defined, specifically to the west and the southeast of the areas of contamination.

You did not mention in this report any change in the current activities. You must do further investigation to define the extent of contamination. Please submit a proposal within 30 days on how to broaden the area of investigation to adequately define the contaminated zone. This may be done concurrently with you Second Quarter report.

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

Sincerely,

Thomas Peacock, Supervising HMS
Hazardous Material Division

cc: Lester Feldman, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0469

February 4, 1991

Ms. Lisa Waters
Shell Oil Company
PO Box 4023
Concord, CA 95424

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

Re: College Shell Station, 5 year permit to operate
Mr. Ben Magsoudi
6039 College Ave.
Oakland, CA 94618

Dear Ms. Waters:

Alameda County Environmental Health Department, Hazardous Materials Division has conducted site inspections at the above facility and has determined that, at this time, all conditions necessary for the issuance for a 5 year permit are being met. Enclosed is a 5 year permit for the facility to operate.

Please contact me at 415/271-4320 if you have any questions.

Sincerely,

Paul M. Smith

Paul M. Smith
Hazardous Materials Specialist

Enclosures (1)

cc:

Mr. Ben Magsoudi, College Shell

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0469

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

December 7, 1990

Mr. Ray Newsome
Shell Oil Company
P.O. Box 4023
Concord, CA 94524

RE: Shell Station, 6039 College Ave., Oakland, CA

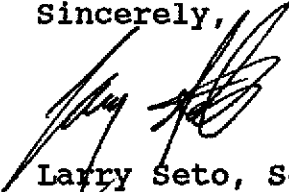
Dear Mr. Newsome:

I have reviewed your "Quarterly Technical Report", that was prepared by Harding Lawson Associates. I concur with the recommended activities for the fourth quarter as proposed by your consultant.

Please submit a deposit/refund check for \$375.00, made payable to the County of Alameda, that will be used to compensate this office for the time we spend working on this site.

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

Sincerely,


Larry Seto, Senior,
Hazardous Materials Specialist

LS:mnc

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency

RWQCB

Howard Hatayama, DOHS

Rafat A. Shahid, Assistant Agency Director, Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0469

June 7, 1990

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

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

Attn: Lisa Foster and Bob Wallin

RE: 5 Year Permit Requirements for Underground Storage Tanks
6039 College Ave., Oakland, 94618

Dear Mr. Magsoudi:

We have received the information (dated 5/10/ and 5/25/90) that we had requested regarding the monthly inventory summaries and also an explanation for past inventory disparities at the above facility. We are encouraged by the efforts which you have made to improve your inventory reconciliation by employee training and doing the stick readings when gas pumps are not being operated.

This office will issue a 5 year permit after you demonstrate a trend which proves to our satisfaction that an actual improvement in your inventory has actually occurred.

Please send us a copy of the monthly inventory summary for the month of May, 1990.

We look forward to receiving this information from you. If you have any questions direct them to Paul Smith, Hazardous Materials Specialist at 271-4320.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edgar B. Howell III', is written over a horizontal line.

Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:PMS: pms

cc: Gil Jensen, Alameda County District Attorney Consumer and
Environmental Protection Division
Ben Magsoudi, Dealer
Bob Wallin, Shell Area Manager

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0469

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

May 22, 1990

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

Attn: Lisa Foster and Ken Lottinger

RE: 5 Year Permit Requirements for Underground Storage Tanks
6039 College Ave., Oakland, 94618

Dear Mr. Magsoudi,

We have received the information that we had requested regarding the monthly inventory summaries for the months of January, February, March, and April 1990. Based upon the reported figures we are unable to issue a 5 year permit for your underground storage tanks at your College Ave facility.

In a brief note from Sandy (Station Manager) on the last quarterly report (Jan 15th- April 15th) form she mentioned that all over/ short variations were due to incorrect stick readings by new employees.


What specifically was done to correct the large daily fluctuations leading to the large monthly inventory losses for each of the months mentioned above? In other words how were you able to make the claim on the quarterly report that the inventory loss on each fuel tank over the 3 month period was not due to an unauthorized release?

How did you arrive at the conclusion that the employees were making improper stick readings?

Mr. Ben Magsoudi
6039 College Ave.
Oakland, CA 94618
Page 2 of 2

You are currently in violation of the underground storage tank permit requirements specified in Title 23 of the CA Code of Regulations. Please address the above concerns within 15 days of the receipt of this letter. If you have any questions direct them to Paul Smith, Hazardous Materials Specialist at 271-4320.

Sincerely,


for Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:PMS: pms

Enclosures (1)

cc: Gil Jensen, Alameda County District Attorney Consumer and
Environmental Protection Division
Ben Magsoudi, Dealer
Ken Lottinger, Shell Area Manager

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0496

March 30, 1990

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

Robert Rosen
Guarantee Forklift, Inc.
699 4th St.
Oakland CA 94607

Dear Mr. Rosen:

On January 29, 1990, Hazardous Materials Specialist Pamela Evans performed an inspection of your facility. Violations were observed and you have since taken steps to correct them. Below is a summary of the violations, corrective measures taken and documented by you, and items that have yet to be resolved:

| Violation | Action Taken | Action Required |
|--|--|---|
| Waste oil spillage | Clean up March 6, 1990 | |
| Failure to monitor underground fuel tank | Tank tightness test done 3/2/90. Results received by this office 3/9/90 show tank passed test. | Submit description of inventory reconciliation and tank gauging activities. |
| No Business Plan submitted | Incomplete Business Plan received by this office 3/9/90. | Supply required information. See description below. |

The information items required to complete your Business Plan include the following:

Item G: Name of an alternate emergency contact person who could be called in the event that the primary person was not available.

Items H-1 and H-2: Inventory information on hazardous materials and wastes, in addition to parts cleaning solvent, kept at your facility. The January 1990 inspection report shows that hazardous wastes generated also include waste oil and steam cleaning fluid. Hazardous materials stored on site include the fuel in the underground tank, oil, unused solvent, and the Dynamist product used with the steam cleaner.

Item I: Facility and site layout diagram that includes features such as surrounding streets, storm and sewer drains, containment systems, hazardous material handling and storage areas (including whether these are above or below ground) and location of emergency response equipment such as fire extinguishers.

Robert Rosen
March 30, 1990

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Item L: Emergency Response and Evacuation Plan that includes notification procedures, measures to prevent release of hazardous substances or to minimize damage in the event of an accidental release, as well as evacuation plans.

Item M: Training Plan that would familiarize employees with procedures to follow in the event of a hazardous materials emergency.

A detailed description of the requirements for items I, L, and M can be found on pages 5 - 6.1 of the instructions attached to the Business Plan.

The steps you have already taken to correct the noted violations indicate your willingness to comply with hazardous materials requirements. Please contact Pamela Evans at 271-4320 regarding any unresolved violations by April 15th, 1990. She can assist you with any questions you may have.

Sincerely,



Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:PJE

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0469

Telephone Number: (415)

March 27, 1990

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

Attn: Lisa Foster & Ken Lottinger

RE: Underground storage tank permit requirements
Mr. Ben Maghsoudi, 6039 College Ave, Oakland 94618

Dear Ms. Foster:

This letter is in regards to the inspection which was done at your facility on January 31, 1990, by Paul Smith of our department. The inspection was performed to evaluate whether the conditions for the 5 year underground storage permit were being met.

Upon inspection of your records, daily inventory swings appeared to be over the allowable daily limits. Upon reviewing the quarterly reports submitted to this office no listings of inventory which exceeded the allowable levels were recorded on the report form. We are aware that the College Ave. facility as of Dec. 1, 1989 has come under new management. Therefore, your 5 year underground storage permit will be issued upon the following conditions:

A monthly inventory will be sent to our office each month for the months of February, March, and April 1990 showing a summary of the balance between the pump registers and the tank stick readings for each fuel tank.

Any inventory swings which exceed the allowable levels specified in Title 23 Section 2640(5)(b) will be justified as to the cause of the variations

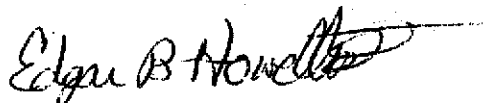
On future quarterly monitoring reports list any inventory level which exceeds the Title 23 allowable level.

Shell Oil Company
March 22, 1990
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Please note that the Business Plan at your College Avenue facility needs to reflect the current ownership of the facility. Please send a copy of the revised plan to our office.

If you have any questions please direct them to Paul Smith with our department at 271-4320.

Sincerely,



Edgar B. Howell III, Chief,
Hazardous Materials Division

EBH:PMS:pms

Enclosure (2)

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Ben Maghsoudi, Dealer
Ken Lottinger, Shell Area Manager