

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT 12-21-05

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

December 21, 2005

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

Subject: Fuel Leak Case No. RO0000495, Shell, 29 Wildwood Avenue, Piedmont, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the report entitled, "Site Conceptual Model," dated November 10, 2005. The report was prepared on Shell's behalf by Cambria Environmental Technology, Inc. Fuel hydrocarbons have been detected in groundwater at the site since 1989. Total petroleum hydrocarbons as gasoline (TPHg), benzene, and methyl tert-butyl ether (MTBE) continue to be detected at elevated concentrations in groundwater in the on-site downgradient monitoring well (MW-3) but concentrations are significantly lower to not detectable in off-site wells. Groundwater monitoring data indicate that the concentrations of fuel hydrocarbons are generally decreasing. Based on the long-term groundwater monitoring data, we concur with the recommendations in the SCM to decrease groundwater monitoring frequency.

Please address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

1. **Groundwater Beneficial Use.** Groundwater at the site is a potential drinking water source. Therefore, water quality criteria for drinking water are to be considered in site evaluation.
2. **Groundwater Monitoring.** Groundwater monitoring has been ongoing at this site since 1989. Based on the long-term monitoring data available for the site, reductions in monitoring frequency from quarterly to annual are acceptable for all monitoring wells except MW-3. Monitoring frequency for well MW-3 is to be revised from quarterly to semi-annual. Groundwater monitoring results are to be presented in the reports requested below.

TECHNICAL REPORT REQUEST

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

- **May 14, 2006** – Semi-Annual Monitoring Report (First Quarter 2006)

- **November 15, 2006 – Semi-Annual Monitoring Report (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.

ELECTRONIC SUBMITTAL OF REPORTS

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

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

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

Denis Brown
December 21, 2005
Page 3

present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

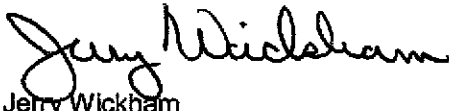
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-23-02

October 22, 2002

RO 495

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

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

RE: Shell Station, 29 Wildwood Avenue, Piedmont - Request for Total Fuel Oxygenate Analyses

Dear Ms. Petryna:

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

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

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

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Robert Weston, ACDEH
John Speakman, Piedmont Fire Dept., 120 Vista Ave., Piedmont, CA 94568
Jacquelyn Jones, Cambria Env. Technology, Inc., 1144-65th St., Ste. B, Oakland, CA 94608



08-040/

R0# 495

August 2, 2001

STID 4110 / PR0501274

Bruce Marubashi
Equilon Enterprises, LLC
3468 Claremont
Modesto, CA 95350

Noel Coffin
Piedmont Shell
29 Wildwood Drive
Piedmont, CA 94610

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

NOTICE OF VIOLATION

Re: Inspection of Shell Station, 29 Wildwood Avenue, Piedmont

Dear Messrs. Marubashi and Coffin:

A regulatory compliance inspection was performed at the subject facility on August 1, 2001. A representative of Service Station Systems, Inc. facilitated the inspection. The purpose of the inspection was to determine compliance with conditions of the facility underground storage tank (UST) operating permit, as well as provisions of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HSC) Chapter 6.7.

The following is a summary of non-compliant and other conditions noted at the time of the inspection:

- 87 and 91 product vapor riser spill buckets were filled with water
- A few bolts were missing from the bolt-down steel surface covers
- A small amount of water/fuel was present in the 87 product STP sump
- Overspill bucket of used oil tank was filled with oil and leaves, and the drain was clogged
- Monthly PLLD test reports indicate periodic back-and-forth reliance on monthly 0.2 gph tests and annual 0.1 gph tests. The UST permit calls for monthly 0.2 gph tests, only.

Violations of provisions of HSC have been identified, as follows:

- HSC Sec. 25293 – The operator of the underground tank system shall monitor the tank system using the method specified on the permit for the tank system. Records of monitoring.....shall be kept in sufficient detail to enable the local agency to determine whether the underground tank system is in compliance with the applicable provisions of [HSC Chapter 6.7], the regulations....., and the permit issued for the operation of the tank system.

Messrs. Marubashi and Coffin
Re: 29 Wildwood Ave., Piedmont
August 2, 2001
Page 2 of 3

Records documenting product line tests revealed a failure to adhere to those specified in the UST permit (monthly at 0.2 gph). Dispensing of used oil into the used oil tank was not in accordance to permit conditions i.e., was not visually monitored to ensure oil went into the drop tube of the tank. These are both violations of the permit to operate the tanks at this site.

Please be advised that HSC Sec. 25299(a) provides for civil liabilities imposed on the tank operator of up to \$5000 per tank per day per violation for:

- (2) Violation of any applicable requirement of the permit
- (3) Failure to maintain records
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

Please be further advised that HSC Sec. 25299(b)) provides for civil liabilities imposed on the tank owner of up to \$5000 per tank per day per violation for:

- (4) Knowing failure to take reasonable and necessary steps to assure compliance with HSC Chapter 6.7 by the operator
- (5) Violation of any applicable requirement of the permit
- (6) Violation of any applicable requirements of HSC Chapter 6.7
- (7) Failure to perform any monitoring, testing, and reporting

At this time, Equilon and the operator are required to correct the tank system operation and maintenance, and facility management issues identified in this inspection report, namely:

- Complete and submit the attached updated UST Registration Forms
- Correct the operation and maintenance problems identified during the 8/1/00 inspection
- Ensure adherence to the UST operating permit and permit conditions

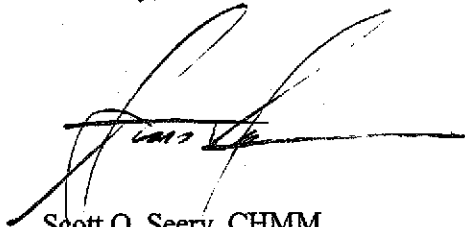
Pursuant to HSC Sec. 25288(d), you required to submit a *Plan of Correction* **within 60 days**. This plan shall indicate the tasks to be completed, or those that have been completed already, and the schedule for doing so. We will expect that accompanying this plan will be the updated UST Registration Forms. In addition, if Equilon would prefer to modify their current permit to allow for annual 0.1 gph PLLD tests in lieu of the 0.2 gph monthly test specified on the permit, you should request this in writing so that the permit can be modified.

You must certify, once all the necessary repairs and other tasks have been completed, that the tank systems are in full compliance with HSC Chapter 6.7 and UST regulations. We recommend, therefore, that you employ your own inspectors and engineers to ensure that this requirement is met, and to provide the appropriate level of quality control you will likely need to make this certification.

Messrs. Marubashi and Coffin
Re: 29 Wildwood Ave., Piedmont
August 2, 2001
Page 3 of 3

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

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

Attachments (Equilon, only)

cc: Susan Torrence, Alameda County District Attorney's Office
Robert Weston, ACDEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



FO367, R0495
R02744, R0254
R02745, R0242

July 13, 1999

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

Aura Mattis
HS & E Representative
Shell Oil Products
P. O. Box 8080
Martinez CA 94553

Subject: Request for underground storage tank leak detection records for first half of calendar year 1999

Dear Ms. Mattis:

The underground storage tanks (USTs) on the attached list are single wall fiberglass tanks. These tanks are required to be monitored for leaks using an automatic tank gauge. The automatic tank gauge shall test the tank at least once per month after product delivery or when the tank is filled to within 10 % of the highest operating level during the previous month and shall be capable of detecting a release of 0.2 gallon per hour.

This is a formal request for copies of the data from those monthly tests. Please submit all test data for the months of January, February, March, April, May and June of 1999. The reports shall include the calculated leak rate and leak threshold for the automatic tank gauge systems installed after January 1, 1995. Data for all USTs at each site shall be submitted within 10 days of this letter.

Additionally, a year end summary is required to be submitted no later than January 30, 2000.

If you have any questions regarding this letter please contact me at (510) 567-6781.

Sincerely,

Robert Weston
Sr. Hazardous Materials Specialist

enclosure

c: Tom Peacock, ACDEP

Shell Stations with Single Wall Fiberglass USTs

Alcosta Shell 8999 San Ramon Road Dublin CA 94568

Bay Super Shell 1800 Powell Street Emeryville CA 94608

Alameda Shell 1601 Webster Street Alameda CA 94501

Bayview Shell 1784 150th Avenue San Leandro CA 94578

Piedmont Shell 29 Wildwood Avenue Piedmont CA 94610

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



(29 WILDWOOD AVE)
RO# 495

May 18, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Dana G. Parry
Law Offices of Dana G. Parry
1200 Concord Avenue, Ste. 200
Concord, CA 94520

RE: Shell Service Station, 29 Wildwood Avenue, and (expanded) Ann Martin
Children's Center, 1246 Grand Avenue, Piedmont

Dear Mr. Parry:

I understand from our conversation and your letter of May 14, 1999 that your client, Mr. Jon Q. Reynolds, is in the process of purchasing a residential property ("Property") located at 1246 Grand Avenue (ASN 051-4638-015-01). The Property immediately adjoins the subject Shell station to the north. I also understand that the Property, once purchased, will be leased to the Ann Martin Children's Center, which currently abuts the Property to the north, to accommodate an expansion of that facility.

The subject Shell Station has been the focus of an environmental investigation since 1984 following the discovery of an apparent gasoline release from the underground storage tanks (UST) formerly at this site. Those early tanks were subsequently replaced in September 1984. I understand that additional station upgrades were completed in early 1998 in order to comply with the December 1998 Federal UST standards. This station is fully permitted to operate.

Since 1984, six (6) groundwater-monitoring wells have been constructed and numerous soil borings advanced in an effort to define the extent of the gasoline release at the subject Shell site. Although soil and groundwater have both been impacted to a noteworthy extent, the data appear to demonstrate that the magnitude of the problem is not as severe as has been witnessed at many similar sites. On-site impacts generally appear to be in the areas adjacent to the dispenser islands and current UST cluster. Wells located across Grand Avenue to the west and southwest have shown periodic evidence of trace concentrations of certain gasoline components. Groundwater is present at shallow depth beneath the site, and appears generally to flow towards the west and southwest.

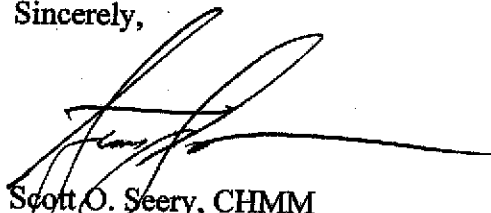
Mr. Dana G. Parry
RE: 29 Wildwood Ave. and 1246 Grand Ave., Piedmont
May 18, 1999
Page 2 of 2

It is possible that soil and groundwater resources beneath the Property have been impacted to some extent by the gasoline release at the subject Shell site. It is not anticipated, however, that such impact, if present, would be significant. Further, potential human health risks for inhabitants at the Property are also not anticipated as a result of the gasoline release at the subject Shell site. This position is based on the technical data presented to date, trends in contaminant distribution and migration controls these data appear to demonstrate, and reported construction characteristics of the Property's residence.

Based on the current information made available to this office, we conclude that groundwater and soil pollution detected on and beneath the subject Shell site is not the likely result of activities or releases from the Property, but, rather, from a release or releases occurring at the subject Shell site. We do not intend to pursue enforcement action against a property owner whose land overlies contaminated soil or groundwater if that contamination is solely the result of the migration of contaminants from an off-site source. Consequently, this office does not intend to name current or future owners of the Property as "responsible parties" with respect to this issue.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB
Karen Petryna, Equiva Services LLC, P.O. Box 6249, Carson, CA 90749-6249

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ROAS

May 4, 1999

STID 1107

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, 29 Wildwood Avenue, Piedmont

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: 29 Wildwood Avenue, Piedmont
May 4, 1999
Page 2 of 2

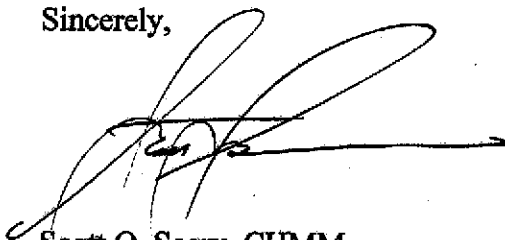
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

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

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

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

Attachments

cc: Chuck Headlee, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#495

August 17, 1998

ENVIRONMENTAL HEALTH SERVICES

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

STID 1107

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

RE: Shell Service Station, 29 Wildwood Avenue, Piedmont

Dear Mr. Perez:

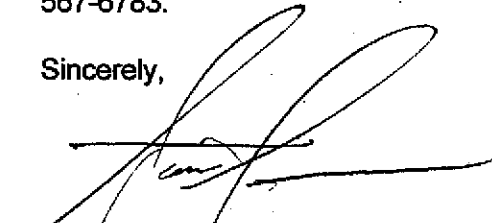
I have recently taken over management of this case from Ms. Pamela Evens of this office. A cursory review of the case file reveals that downgradient well MW-4 has not been sampled nor monitored since July 1996. The July 28, 1998 Cambria Environmental Technology, Inc. 2nd quarter 1998 report indicates this well was "inaccessible" during the May 1998 sampling event, as well as the January and October 1997 events.

This issue was brought to Shell's attention in correspondence from this office dated April 8, 1998, a full five weeks before the May event. Two years without data from this sample location is unacceptable.

We expect that Shell or their agents will ensure that this well is accessible for all future sampling events.

Should you have any questions about the content of this letter, please contact me at (510) 567-6783.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Maureen Feineman, Cambria Environmental Technology, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#495

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

April 8, 1998

Alex Perez
Shell Oil Products Company
P.O. Box 40223
Concord CA 94524

RE: Groundwater Investigation and Monitoring
Shell Station, 29 Wildwood Av., Piedmont CA 94611 (our site # 1107)

Dear Mr. Perez:

I have assumed case responsibility for the above referenced Shell Station. I recently discussed the 1997 fourth quarter sampling report with Maureen Feineman of Cambria Environmental. I have the following comments about Shell's groundwater monitoring and investigation activities:

- TPHg and BTEX concentrations are dropping or at least stabilizing in all wells being tested. However, MW-4 has not been tested in over a year. Is there an access problem, or was testing discontinued by agreement with this Office?
- At this time, MTBE has become a focus of concern. Concentrations have dropped in the two closest down gradient wells (MW-2 and MW-3). However, MTBE was detected for the first time in the up gradient well (MW-1) and in an off site well (MW-5) in October 1997. MW-4 has not been sampled recently. Please continue a semi-annual monitoring schedule for MW-1, MW-5 and, if possible, MW-4. You may drop to a yearly testing schedule for MW-2 and MW-3.
- Chlorinated compounds were mentioned in a June, 1996 letter from Weiss Associates. The letter states that HVOCs were found in MW-4 and MW-5. Additional information about the presence of HVOCs in groundwater beneath the site is needed. I understand that a dry cleaning facility may be located near the station, however, the onsite waste oil tank is another possible source. Our file notes show that shortly after we received a copy of the Weiss Associates letter, we instructed the consultant to include HVOCs in future groundwater analyses. However, our file contains no subsequent reports of HVOC sampling. Please test all wells for HVOCs in the next sampling event.
- Please include a narrative evaluation of the effectiveness of your bioremediation activities in future reports.
- There was a long delay between the last sampling event (October 24, 1997) and the arrival of the monitoring report at this Office (March 25, 1998). Please submit monitoring reports within 45 days after field work is completed.

You may contact me at (510)567-6770 with any questions.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

c: Dick Pantages, Alameda County Environmental Health Services
Maureen Feineman, Cambria Environmental Technology, 1144 65th St., Suite B, Oakland 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 495

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

May 13, 1996
STID 1107

Attn: Jeff Granberry
Shell Oil Co.
PO Box 4023
Concord CA 94524

RE: Shell Service Station, 29 Wildwood Ave., Piedmont CA 94610

Dear Mr. Granberry,

Since my last letter to Shell Oil Co., dated 4/11/95, I have received the following documents:

- 1) letter from Tom Fojut of Weiss, dated 7/16/95 (status report);
- 2) Groundwater Monitoring Well Abandonment report, prepared by Weiss, dated 8/21/95;
- 3) Third Quarter 1995 report, prepared by Weiss, dated 9/14/95; and
- 4) First Quarter 1996 report, prepared by Weiss, dated 4/9/96.

Deep water well E-4 has been properly abandoned. The remainder of the wells (MW1 through MW5) are being sampled and monitored during the first and third quarters.

It has been noted that concentrations of TPH-g and BTEX have not shown decreasing trends in MW3 since 7/93, and possibly earlier. This was discussed by telephone between Dale Klettke of this office (during my absence) and Tom Fojut of Weiss on 10/4/95. The file notes indicate that they discussed implementing a low cost system to attenuate concentrations in the vicinity of MW3. File notes also indicate that Tom Fojut would discuss this with Shell Oil Co., and report back to Alameda County. It is unknown what the outcome was. **Please contact me regarding this issue within 30 days.** I can be reached directly at 510-567-6761; our fax number is 510-337-9335.

Sincerely

Jennifer Eberle
Hazardous Materials Specialist

cc: Tom Fojut, Weiss Associates, 5500 Shellmound St., Emeryville CA 94608
Acting Chief/file

je.1107-A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0495

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

April 11, 1995
STID 1107

Attn: Dan Kirk
Shell Oil Co.
PO Box 4023
Concord CA 94524

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

RE: Shell Service Station, 29 Wildwood Ave., Piedmont CA 94610

Dear Mr. Kirk,

I am in receipt of the Fourth Quarter 1994 report, prepared by Weiss Associates, dated 12/28/94. This report documents the sampling and monitoring activities conducted on 10/6/94. Page 2 of the report indicates a request for a reduced sampling frequency. Table 3 specifies the reduction in the sampling frequency. **This request is acceptable with the exception of MW1; it should also be sampled semi-annually.** (I am also in receipt of the First Quarter 1995 report, prepared by Weiss Associates, dated 3/10/95. Table 3 reflects this change.) **Please bring future requests to my attention by way of cover letter and/or a telephone call. I can respond in a more timely manner, and can prioritize my work appropriately if I am properly informed.**

I contacted Mike Maley of Weiss on 3/7/95 to discuss the sampling frequency reduction. In addition, we discussed the need to properly abandon well E4, because it is screened in the deep aquifer, and may act as a conduit to contamination.

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335.

You are encouraged to submit reports on double-sided paper in order to save trees.

Sincerely,

Jennifer Eberle
Hazardous Materials Specialist

cc: Mike Maley, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608
Ariu Levi/file

je.1107

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0495

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 23, 1992

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 1107

Shell Oil Co.
PO Box 5278
Concord CA 94520
Attn: Dan Kirk

RE: Shell Service Station
29 Wildwood Av.
Piedmont CA 94610

Dear Mr. Kirk,

We are in receipt of a letter report dated 9/29/92 by your consultant, Weiss Associates (WA). This letter summarizes the site's history and **does not recommend** groundwater or soil remediation for reasons therein stated; only quarterly groundwater monitoring is recommended. We are also in receipt of boring logs for the site; this information was submitted by WA under transmittal letter dated 10/13/92.

We do not agree with your arguments for no remediation in the 9/29/92 letter report for the following reasons:

1. The gasoline detected in MW3 may be the tail end of a larger plume. This plume may be following preferential pathways such as the utility lines in the street(s) and/or the sandy gravelly layers in the site vicinity, which vary from approximately 5 to 15 feet bgs, according to the boring logs. The lateral extent of the plume has not been defined to the satisfaction of this office.
2. The onsite gradient of .03 ft/ft is sufficient to move the plume downgradient and offsite in a direction likely parallel to Grand Avenue.
3. Offsite monitoring wells MW4 and MW5 are not sufficient to characterize a downgradient plume. The groundwater elevation contours are drawn in such a fashion as to direct groundwater from the site to MW4 and MW5. (See Fig. 2 in 9/22/92 letter report). Note that the offsite groundwater elevation contours are dashed, indicating that groundwater flow was deduced by inference. An equally likely scenario for groundwater flow is along the east side of Grand Avenue. Although the presence of utilities in Grand Ave. were cited as a reason for not being able to install another well, it is possible to site a well in the sidewalk of Wildwood Ave. at or near the corner of Grand Ave.

Dan Kirk
STID 1107
Page 2 of 2
October 23, 1992

We requested a workplan to define the lateral and vertical extent of soil and groundwater contamination by letter dated 6/29/92. We then requested a remediation workplan for soil and groundwater by letter dated 8/18/92. Your consultant responded by recommending no further assessment or remediation. We have outlined the reasons why we do not agree with WA's rationale for no further assessment or remediation. Shell has not thus far provided any means to prevent migration of the plume offsite. Therefore, we require that you submit a workplan for the delineation of soil and groundwater contamination, including interim plume control measures within 40 days or by December 3, 1992.

The information obtained from this investigation will be utilized in a viable Corrective Action Plan, as per Article 11 of 23CCR. As per 23 CCR Section 2653, "owners and operators shall (2) prevent further migration of the released substance into surrounding soils and groundwater." As per 23 CCR Section 2724, "The responsible party shall conduct investigations of the unauthorized release, the release site, and the surrounding area. . .if. . .(4) the regulatory agency requests an investigation. ."

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b).

All work should adhere to a) the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated 8/10/90; b) the State Water Resources Control Board LUFT Field Manual; and c) Article 11 of Title 23, California Code of Regulations. Reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All reports and documents pertaining to this investigation should also be sent to Rich Hiatt, San Francisco Bay Region, Regional Water Quality Control Board, 2101 Webster St., Ste 500, Oakland CA 94612. If you have any questions, please contact me at 510-271-4530.

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Scott MacLeod, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608-2411
Rich Hiatt, RWQCB
Ed Howell/File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0495

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 18, 1992

STID 1107

Shell Oil Co.
PO Box 5278
Concord CA 94520
Attn: Dan Kirk

RE: Shell Service Station
29 Wildwood Ave.
Piedmont CA 94610

Dear Mr. Kirk,

We are in receipt of a letter dated 8/11/92 from Weiss Associates (WA) in response to our letter dated 6/29/92. WA does not recommend further investigation at this time. They indicate that the extent of hydrocarbons has been defined in previous investigations.

A background review for this site indicates that up to 6,500 ppm TPH-g was detected in soil samples collected at 10 feet bgs from soil borings located adjacent to the existing fuel USTs (Ensco, 1988). Apparently, this soil contamination was never addressed. In addition, elevated concentrations of petroleum hydrocarbons have existed in groundwater since 1990. MW3 contained 6,000 ppb TPH-g and 480 ppb benzene during the second quarter of 1992. Therefore, we request a remediation workplan for soil and groundwater within 45 days of the date of this letter, or by October 3, 1992.

All reports and proposals must be submitted under seal of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All proposals, reports, and analytical results pertaining to this investigation and remediation must be sent both to our office and to:

Rich Hiett
RWQCB, San Francisco Bay Region
2101 Webster St., Suite 500
Oakland CA 94612

If you have any questions, please contact Jennifer Eberle at 510-271-4320.

Dan Kirk
STID 1107
Page 2 of 2
August 18, 1992

Sincerely,



Susan Hugo
Senior Hazardous Materials Specialist

cc: David Elias, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608-2411
Rich Hiatt, RWQCB
File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0495

RAFAT A. SHAHID, Assistant Agency Director

June 29, 1992

STID 1107

Shell Oil Co.
PO Box 5278
Concord CA 94520
Attn: Dan Kirk

RE: Shell Service Station
29 Wildwood Ave.
Piedmont CA 94610

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

Dear Mr. Kirk,

The case file for the above referenced site has been reassigned to Jennifer Eberle, Hazardous Materials Specialist. Please forward future correspondence to her attention.

A subsurface investigation was conducted at this site in July 1989, in which soil borings and groundwater monitoring wells were sampled. Up to 710 ppm TPH was detected in soils. (It is unknown when or why the wells were installed.) Since the third quarter of 1990, groundwater beneath the site has been contaminated with elevated concentrations of TPH-g and benzene. Monitoring well #3 (MW3) has generally shown the highest concentrations. These concentrations have actually been increasing since 1990. In the second quarter of 1992, MW3 contained 6,000 ppb TPH-g and 480 ppb benzene.

According to our files, the underground storage tanks on site are single walled and were installed in 1984. Quarterly Inventory records submitted to our office have shown stick readings errors and/or inventory variations which exceeded the allowable limits in the 4th quarter of 1988, 1st, 2nd, 3rd and 4th quarters of 1989, 1st and 2nd quarters of 1990, and 1st and 3rd quarters of 1991.

There seems to be a problem at this site. It may be a leaking UST, pipeline, or an overspill during filling. Therefore, you are requested to submit a workplan addressing measures to adequately define the lateral and vertical extent of soil and groundwater contamination. Please respond to us within 45 days or by August 13, 1992. Although UST replacement is not mandated until 1998, tank removal in conjunction with remediation may be an option worthy of consideration in light of the situation outlined above.

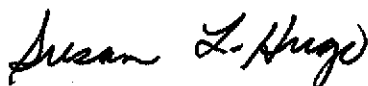
Dan Kirk
STID 1107
Page 2 of 2
June 29, 1992

All reports and proposals must be submitted **under seal** of a California-Registered Geologist, -Certified Engineering Geologist, or -Registered Civil Engineer. All proposals, reports, and analytical results pertaining to this investigation and remediation must be sent both to our office and to:

Rich Hiatt
RWQCB, San Francisco Bay Region
2101 Webster St., Suite 500
Oakland CA 94612

If you have any questions, please contact Jennifer Eberle at 510-271-4320.

Sincerely,



Susan Hugo
Senior Hazardous Materials Specialist

cc: David Elias, Weiss Associates, 5500 Shellmound St.,
Emeryville CA 94608-2411
Rich Hiatt, RWQCB
File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0495

September 19, 1990

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

Noel Coffin
Piedmont Shell
29 Wildwood Dr.
Piedmont, CA 94610

Re: Waste Minimization Assessment

Dear Noel Coffin:

Your business has been selected to receive a hazardous waste minimization assessment. As you are probably aware, hazardous waste reduction has become a statewide, if not a national, issue. To address this issue at a county level, Alameda County is establishing its own Hazardous Waste Minimization Program and is planning to conduct waste minimization assessments for all hazardous waste generating facilities in the County.

We have chosen businesses in the auto repair industry to receive the first round of waste minimization assessments. It is our hope that these assessments will assist participating businesses in minimizing their hazardous wastes - and will give us further information on the best way to structure our minimization program.

One of our Hazardous Materials Specialists will be contacting you during the week of September 24 to arrange a meeting with you for an assessment of your business. During this meeting and assessment, the Specialist will work with you in examining your business's hazardous waste generating practices. The Specialist will then provide you with materials on waste reduction technology and assist you in setting up appropriate hazardous waste minimization practices.

We look forward to working with you in reducing the amount of hazardous waste your business generates. Of course, your comments and suggestions are encouraged; we need your input in order to best serve you! Please direct any comments and questions to Katherine Chesick at 415/271-4320.

Sincerely,

A handwritten signature in black ink that reads "Edgar B. Howell". The signature is written in a cursive style and is positioned above the typed name.

Edgar B. Howell, Chief,
Alameda County Hazardous Materials Division

EBH:kac

cc: Fire Department
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RC495

~~RC~~

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

June 8, 1990

Ms. Diane Lundquist
Shell Oil Co.
P.O. Box 4023
Concord, CA 94524

Re: Request for technical reports for three Shell sites: 230
MacArthur Blvd., Oakland; 29 Wildwood Ave., Piedmont; and 999 San
Pablo Ave., Albany

Dear Ms. Lundquist:

In reviewing my files recently, it came to my attention that I do not have the reports and technical information I should on the three sites listed above. I will treat each of the sites, including our requirements for technical submittals, individually.

(R0303) 230 MacArthur Blvd., Oakland

The newest monitoring well installed at this site, MW-4, shows an increasing trend of hydrocarbon contamination. Although only two samples have been taken from this well (January 23 and March 8, 1990), TPH levels have increased from 1.6 ppm to 4.2 ppm. None of the other monitoring wells show any contamination. Well MW-4 appears to be downgradient of the tank cluster and the lower pump island, indicating that one of these areas is likely to be the source of contamination. This warrants further investigation, both to pinpoint the actual source and to define the local limits of a possible plume. Please submit a work plan that addresses these questions within 30 days, i.e., no later than July 9, 1990. This work plan should be submitted to this office and to the Regional Water Quality Control Board (attn: Lester Feldman), and must include a schedule for implementation of various tasks.

(R0495) 29 Wildwood Ave., Piedmont

In a report dated September 25, 1989, Weiss Associates recommended the following actions at this site:

- the installation of three soil borings, as well as downgradient and off-site monitoring wells;
- the sampling of all wells; and
- the preparation of a report summarizing results.

The need for this additional investigative work was reiterated in one of the quarterly meetings between Shell Oil Co. and this office.

Ms. Diane Lundquist
June 8, 1990
Page 2 of 3

According to our files, however, no report has been submitted since September 1989. Therefore, assuming that the work Weiss recommended has in fact been completed, we are requiring that Shell submit a report to this office and to the RWQCB by **June 25, 1990**. This report must summarize results to date, discuss site hydrogeology in some detail, and present recommendations and a schedule for further action. If the work recommended by Weiss has not been accomplished, then such a report is due on **July 23, 1990**. As in all other leak cases, quarterly sampling and reporting of all wells must be done.

In addition, according to the records, Shell has not submitted an Unauthorized Release Report to this office. Please complete and submit this form to our office immediately. Finally, we will need a deposit in the amount of \$375, made out to Alameda County, to cover our costs for site review. Please send this along with the report discussed above, or sooner if possible.

(R0121) 999 San Pablo Ave., Albany

Gettler-Ryan found floating product in observation wells at this site in April 1989. This office advised Shell of the need to act immediately to investigate the situation, and as a result Shell apparently contracted with Gettler-Ryan/GeoStrategies to drill 7 soil borings and 3 monitoring wells at the site (a total of 10 holes). According to the work plan, these tasks were to be completed by February 9, 1990, with a report available by March 30. However, as of the date of this letter, we have not received the report. Please submit this report to this office and to the RWQCB by **June 25, 1990**. This report should include the following elements:

1. a summary of site work and results;
2. a discussion of the likely source(s) of contamination, based on analytical results; and
3. recommendations for further work, including a schedule for implementing this work.

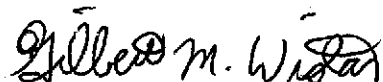
As in the case above, please submit a deposit of \$375 for county oversight of the site, as well as an Unauthorized Release Report.

Because we are overseeing each of these sites under the designated authority of the RWQCB, this letter constitutes a formal request for technical reports, according to Sec 13267 of the Water Code. Additionally, local implementing agencies now have direct authority to require technical reports and implementation schedules, under Sec. 25299.36 of the California Health and Safety Code.

Ms. Diane Lundquist
June 8, 1990
Page 3 of 3

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,



Gil Wistar
Hazardous Materials Specialist

cc: Howard Hatayama, DOHS
Lester Feldman, San Francisco Bay RWQCB
Gil Jensen, District Attorney, Alameda County Consumer and
Environmental Protection Agency
Rafat A. Shahid, Asst. Agency Director, Env. Hlth.
files (3 sites)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0495

Telephone Number: (415)

March 22, 1990

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

Attn: Lisa Foster & Ken Lottinger

RE: Underground storage tank permitting
Noal Coffin, 29 Wildwood Ave, Piedmont, CA 94610

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 with regard the 5 year underground storage tank permit. Enclosed is a 5 year permit to operate.

If you have any questions please contact Paul Smith with our department.

Sincerely,

Edgar B. Howell III, Chief,
Hazardous Materials Division

EBH:PMS:pms

Enclosures (1)

cc: Ken Lottinger, Shell Area Manager
Noal Coffin, Dealer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



R0495

Telephone Number: (415)

March 22, 1990

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

Attn: Lisa Foster & Ken Lottinger

RE: Underground storage tank permitting
Noal Coffin, 29 Wildwood Ave, Piedmont, CA 94610

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If you have any questions please contact Paul Smith with our department.

Sincerely,

Edgar B. Howell III, Chief,
Hazardous Materials Division

EBH:PMS:pms

Enclosures (1)

cc: Ken Lottinger, Shell Area Manager
Noal Coffin, Dealer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

May 9, 1989

Ms. Karen M. Singer
Aqua Terra Technologies
2950 Buskirk Ave., Suite 120
Walnut Creek, CA 94596

Subject: File Search For Piedmont, CA

Dear Ms. Singer:

As requested, we have searched our files for AB2185, Underground Tank and Prop. 65 reports. The following is a compilation of this search.

Name & Address	2185 Filed	UGT PERMIT	PROP. 65
Montclair Cleaners 6122 LaSalle Ave.	yes	-0-	none
R0495) Piedmont Shell 29 Wildwood Ave.	yes	4	none
Chevron R0269) 340 Highlands	no	4	none
S.D. Gross 90 Inverleith Terr.	no	1	none
Piedmont Corp. Yard 898 Redrock Rd.	no	1	none
→ Piedmont City Hall 120 Vista Ave.	no	2	none

This letter is limited to the information which is in our files and does not include any information which may be available to other agencies or businesses involved with these sites.

If you have any questions please call Edgar Howell, Program Administrator at (415) 271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:EH:mnc

cc: Ed Howell
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0495

May 9, 1989

Ms. Karen M. Singer
Aqua Terra Technologies
2950 Buskirk Ave., Suite 120
Walnut Creek, CA 94596

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

Subject: File Search For Piedmont, CA

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Name & Address	2185 Filed	UGT PERMIT	PROP. 65
Montclair Cleaners 6122 LaSalle Ave.	yes	-0-	none
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(R0269) Chevron 340 Highlands	no	4	none
S.D. Gross 90 Inverleith Terr.	no	1	none
Piedmont Corp. Yard 898 Redrock Rd.	no	1	none
→ Piedmont City Hall 120 Vista Ave.	no	2	none

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If you have any questions please call Edgar Howell, Program Administrator at (415) 271-4320.

Sincerely,

Rafat A. Shahid, Chief,
Hazardous Materials Program

RAS:EH:mnc

cc: Ed Howell
Files