

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
7-14-05

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

July 13, 2005

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

Subject: Fuel Leak Case No. RO0002441, Shell, 9750 Golf Links Road, Oakland, CA

Dear Mr. Brown:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the reports entitled, "Site Investigation Report," dated May 5, 2005 and "Groundwater Monitoring Report – First Quarter 2005," dated June 7, 2005 prepared for the above referenced site on behalf of Shell by Cambria Environmental Technology, Inc. The "Site Investigation Report" presents soil sampling results from four soil borings and the "Groundwater Monitoring Report – First Quarter 2005," presents results for groundwater samples collected on March 23, 2005. Groundwater monitoring at the site has detected elevated concentrations of methyl tert-butyl ether (MTBE) in groundwater samples collected at the site. Based on staff review of the documents referenced above, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **Proposed Well S-3.** The "Site Investigation Report" indicates that well S-3 could not be installed and that well S-4 was relocated midway between the original locations for wells S-3 and S-4. Only a brief comment is provided in Table 1 regarding attempts to install well S-3. Please provide additional descriptions of the difficulties encountered in installing well S-3. The text of the report refers to "underground lithologic conditions, and/or underground utilities, and pea-gravel," interfering with well installation. In the revised report requested below, please fully describe the encountered conditions and how they affected well installation.
2. **Locations of Storm Drains and Culvert.** Figure 2 in each of the two above referenced reports shows the approximate location of a 6-foot by 10-foot culvert beneath Golf Links Road. Previous reports and the work plan for this well installation ("Site Investigation Report and Well Installation Work Plan" dated July 19, 2004) have shown the culvert in a significantly different location along the western side of the site. The location of the culvert is a factor in assessing site characterization and groundwater sampling results. Previous reports ("Subsurface Investigation Report" dated June 7, 2000) have observed that fill material near the culvert may act as a conduit to Arroyo Viejo Creek. Please clarify in the revised report requested below, which is the correct location for the culvert and revise the site maps, if necessary.

3. **Surface Water Sampling from Arroyo Viejo Creek.** Collection of surface water samples from Arroyo Viejo Creek was proposed in the document entitled, "Agency Response and Well Installation Work Plan Addendum," dated December 5, 2002; however, no sampling results appear to have been presented in subsequent reports. Please confirm whether surface water samples have been collected from Arroyo Creek. If surface water sampling has not been conducted and future sampling is not planned, present the rationale for not collecting these samples. This information is to be presented in the revised report requested below.
4. **Cross Sections.** The revised report is to include one north-south and one east-west cross section. Each cross section should include the following:
 - Surface topography. The cross sections should be extended off-site where necessary to show significant breaks in slope.
 - Soil descriptions for all borings and wells along the line of section.
 - Screen and filter pack intervals for each monitoring well.
 - Sampling locations and results for soil and grab groundwater samples.
 - Site features such as the tank pit, dispensers, etc.
5. **Groundwater Monitoring.** Quarterly groundwater monitoring is to be implemented for the four groundwater monitoring wells at the site. Groundwater samples are to be analyzed for total petroleum hydrocarbons, benzene, toluene, ethylbenzene, xylenes, MTBE, and fuel oxygenates using EPA Method 8260B. 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: Mr. Jerry Wickham), according to the following schedule:

- **August 30, 2005** - Quarterly Report for the Second Quarter 2005
- **September 13, 2005** - Revised Site Investigation Report
- **November 30, 2005** - Quarterly Report for the Third Quarter 2005
- **February 28, 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

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

Denis Brown
July 13, 2005
Page 3

letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

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

UNDERGROUND STORAGE TANK CLEANUP FUND

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

AGENCY OVERSIGHT

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

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

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Ana Friel
Cambria Environmental Technology, Inc.
270 Perkins Street
Sonoma, CA 95406

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT
04-06-04

April 5, 2004

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

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

Dear Ms. Petryna:

Subject: Fuel Leak Case No. RO0002441, Shell Service Station, 9750 Golf Links Rd.,
Oakland, CA

Thank you for your "Notice of Intent to Implement Work Plan" dated March 17, 2004. You intend to implement a portion of the scope of work presented in the *Agency Response and Well Installation Work Plan Addendum* dated December 4, 2002, prepared by Cambria Environmental Technology, by installing one pilot boring hole to 100 feet below grade. Then based on the results of the pilot boring, additional work will be proposed. Alameda County Environmental Health staff has reviewed "Agency Response and Well Installation Work Plan Addendum" dated December 4, 2002, prepared by Cambria Environmental Technology. We generally agree with your proposal. We request that you send us the technical report requested below.

TECHNICAL REPORT REQUEST

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

June 5, 2004 - Soil and Groundwater Investigation

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

C: Ana Friel, Cambria Environmental Technology, Inc., 270 Perkins St., P.O. Box 259,
Sonoma, CA 95476
Donna Drogos
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



10-10-02

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

October 9, 2002

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

Dear Ms. Petryna:

Subject: Fuel Leak Case No. RO0002441, Shell Service Station, 9750 Golf Links Rd., Oakland, CA

Alameda County Environmental Health staff has reviewed "Well Installation Work Plan" dated May 17, 2002, prepared by Cambria Environmental Technology, and generally concur with the work proposed. We request that you address the following technical comments and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Monitoring Well Depths – The only groundwater samples yielded thus far were from soil borings SB-2 at 12 feet below grade (fbg) and SB-3 at 20 fbg. Both were attributed to a perched water zone. The depths for onsite wells ranged from 16 to 48 fbg. In 2000, a sensitive receptor survey found only one well within a 1/4-mile survey radius. This was a cathodic protection well located approximately 1,150 feet north-northwest of the site with a depth of 120 fbg. No depth to groundwater was available. Include your proposal for determining monitoring well depths in the revised workplan requested below.
2. Monitoring Well Locations - We do not concur with one of the locations proposed, south of the former fuel tanks. We feel that this location may miss downgradient flow from the former fuel tanks although we do want a well within 10 feet of the former fuel tanks and another one within 10 feet of the former dispensers in the downgradient direction. Include your proposal to meet these requirements in the revised workplan requested below.
3. Arroyo Viejo Creek Sampling – Include a map showing your proposed sample locations in the revised workplan requested below.
4. Soil and Groundwater Analyses – Please analyze all soil and groundwater samples for Total Petroleum Hydrocarbons-Gasoline (TPH-G), Benzene, Toluene, Ethyl Benzene, Xylene (BTEX), and MTBE. Additionally, for groundwater samples, analyses for the fuel oxygenates MTBE, Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether

Ms. Petryna
October 9, 2002
Page 2 of 2

8260, is required. After the initial round of sampling, sample for any of these contaminants found in subsequent quarters. Include these analyses in the revised workplan requested below.

5. B1 Boring - Missing log. Submit.
6. Legitimacy Statement - All technical reports shall be accompanied by a letter signed by an officer or legally authorized representative of the responsible party that states, at a minimum: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached proposal or report is true and correct to the best of my knowledge."
7. Vicinity hydrogeologic setting - Include in the revised workplan requested below.

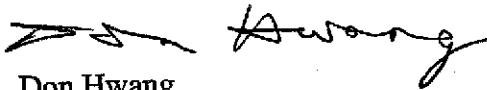
TECHNICAL REPORT REQUEST

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

December 9, 2002 - Revised Workplan.

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: Jacquelyn Jones, Cambria Environmental Technology, Inc., 1144-65th St., Suite B,
Oakland, CA 94608

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



04-02-02

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

March 29, 2002

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

Dear Ms. Petryna:

Subject: Fuel Leak Case No. RO0002441, Shell Service Station, 9750 Golf Links Rd.,
Oakland, CA

Alameda County Environmental Health staff has reviewed "Subsurface Investigation Report" dated June 7, 2000, prepared by Cambria Environmental Technology. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. Groundwater Monitoring - The extent of groundwater contamination at your site is undefined. There are no groundwater monitoring wells onsite. Five borings, SB-1b, SB-2, SB-3, SB-4, and SB-5 were installed on August 25, 1999. Groundwater samples were collected from two borings, SB-2 and SB-3, at 12 feet below grade (fbg) and 20 fbg, respectively, with up to 11,800 u/g of Methyl Tertiary Butyl Ether (MTBE) detected. Groundwater was not found in borings, SB-1b, SB-4, and SB-5, drilled to a maximum depth of 30 feet below ground surface. Characterization of groundwater contamination is required at your site. Please include your proposal for completing this work in the workplan requested below.
2. Arroyo Viejo Creek - Arroyo Viejo Creek is located approximately 650 feet southeast in the apparent downgradient direction of your site. Due to the presence of significant levels of MTBE, a compound that is more mobile in soil and groundwater than the typical petroleum hydrocarbon compounds at your site, we request that you collect and analyze water samples from the creek. Please include your proposal for creek sampling in the workplan requested below.

Ms. Petryna
March 29, 2002
Page 2 of 2

3. Soil and Groundwater Analyses – Please analyze all soil and groundwater samples for Total Petroleum Hydrocarbons-Gasoline (TPH-G), Benzene, Toluene, Ethyl Benzene, Xylene (BTEX), and MTBE. . Additionally, for groundwater samples, analyses for the fuel oxygenates MTBE, Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), by EPA Method 8260, is required.

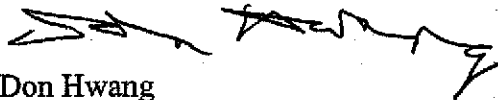
TECHNICAL REPORT REQUEST

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

May 29, 2002 - Workplan.

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

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



R0244

July 6, 1999

ENVIRONMENTAL HEALTH SERVICES

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

STID 3672

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

RE: Shell Station, 9750 Golf Links Road, Oakland – Soil and Water Investigation

Dear Ms. Petryna:

I have reviewed the June 29, 1999 Cambria Environmental Technology, Inc. (Cambria) *Additional Investigation Work Plan* for the continuing assessment of this site. The cited Cambria work plan was prompted by the initial discovery of elevated fuel compound concentrations in soil sampled during dispenser upgrade work that occurred in early 1998, and a subsequent limited assessment performed during July 1998.

The cited Cambria work plan has been accepted as submitted.

I expect that this work plan will be implemented within 45 days of the date of this letter.

Please contact me at (510) 567-6783 should you have any questions and to inform me when field activities will begin.

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Chuck Headlee, RWQCB
Leroy Griffin, Oakland Fire Department
Darryk Ataide, Cambria Environmental Technology, Inc.
1144 65th Street, Ste. B, Oakland, CA 94608

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO 2441

May 5, 1999

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

STID 3672

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

RE: Shell Service Station, 9750 Golf Links Road, 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: 9750 Golf Links Road, Oakland
May 5, 1999
Page 2 of 2

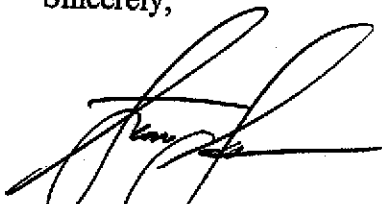
In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 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



1202441

STID 3672
202889

December 3, 1998

STID 3672

Ms. Karen Petryna
Equiva Services LLC
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 Station, 9750 Golf Links Road, Oakland

Dear Ms. Petryna:

I have reviewed the November 24, 1998 Cambria Environmental Technology, Inc. (Cambria) *Subsurface Investigation Report* for the limited assessment of an area adjacent to the northeastern-most dispenser at this site. This work was prompted by the elevated concentrations of fuel compounds detected in soil sampled during upgrade work performed on or adjacent to this dispenser.

The cited Cambria report presents the results of intrusive work performed in the area of the subject dispenser during July 1998. A single boring was advanced in two efforts to a reported depth of 30' below grade (BG). Up to 14,000 parts per million (ppm) total petroleum hydrocarbons as gasoline (TPH-G) and 100 ppm benzene were detected in soil at the 13' depth. This depth appears consistent with a silty sand layer reported between 12 and 15' BG. "Perched" water was reportedly encountered within this silty sand layer.

The extent and severity of this release has not yet been determined. Therefore, additional assessment work is required before consideration for case closure may be given.

At this time, and consistent with provisions of Article 11, Title 23, California Code of Regulations, please have your consultant submit a Soil and Water Investigation (SWI) work plan for the continued assessment of the fuel release at this site. The SWI work plan is due for submittal within 45 days of the date of this letter.

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

Sincerely,


Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Leroy Griffin, Oakland Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



STID 3672
202441 / 202889

December 3, 1998

STID 3672

Ms. Karen Petryna
Equiva Services LLC
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 Station, 9750 Golf Links Road, Oakland

Dear Ms. Petryna:

I have reviewed the November 24, 1998 Cambria Environmental Technology, Inc. (Cambria) *Subsurface Investigation Report* for the limited assessment of an area adjacent to the northeastern-most dispenser at this site. This work was prompted by the elevated concentrations of fuel compounds detected in soil sampled during upgrade work performed on or adjacent to this dispenser.

The cited Cambria report presents the results of intrusive work performed in the area of the subject dispenser during July 1998. A single boring was advanced in two efforts to a reported depth of 30' below grade (BG). Up to 14,000 parts per million (ppm) total petroleum hydrocarbons as gasoline (TPH-G) and 100 ppm benzene were detected in soil at the 13' depth. This depth appears consistent with a silty sand layer reported between 12 and 15' BG. "Perched" water was reportedly encountered within this silty sand layer.

The extent and severity of this release has not yet been determined. Therefore, additional assessment work is required before consideration for case closure may be given.

At this time, and consistent with provisions of Article 11, Title 23, California Code of Regulations, please have your consultant submit a Soil and Water Investigation (SWI) work plan for the continued assessment of the fuel release at this site. The SWI work plan is due for submittal within 45 days of the date of this letter.

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

Sincerely,



Scott O. Seery, CHMM
Hazardous Materials Specialist

c: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Leroy Griffin, Oakland Fire Department

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Ro#2441

ENVIRONMENTAL HEALTH SERVICES

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

July 2, 1998

STID 3672

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

RE: Shell Service Station, 9750 Golf Links Road, Oakland

Dear Mr. Perez:

I have taken over current management of this case from Pamela Evans of this office.

I recently completed review of the May 14, 1998 Cambria Environmental Technology, Inc. (Cambria) work plan entitled "*Investigation Work Plan*," and map revisions dated May 28 and July 2, 1998. This work plan and revisions are intended to corroborate the results of soil samples collected during the February 1998 dispenser upgrade activities.

The cited Cambria work plan is accepted as revised. I understand fieldwork is slated to begin July 6.

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

Sincerely,

Scott O. Seery, CHMM
Hazardous Materials Specialist

cc: Mee Ling Tung, Director, Environmental Health
Chuck Headlee, RWQCB
Leroy Griffin, Oakland Fire Department
Maureen Feineman, Cambria Environmental Technology, Inc.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO# 2889

RO#2441

April 10, 1998

Jeff Granberry
Shell Oil Company
P.O. Box 4023
Concord CA 94520

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

RE: **Fuel Contamination of Soil at Shell Station**
9750 Golf Links Road, Oakland CA 94605 (our site # 3672)

Dear Mr. Granberry:

In February 1998, soil samples were taken in the course of a tank system upgrade at the above referenced Shell station. Total petroleum hydrocarbons as gasoline were present at levels up to 7,800 ppm and benzene was present at up to 37 ppm in soil. These benzene levels exceed human health protective levels given in the Tier 1 Table of the ASTM Risk-Based Corrective Action Guidelines (E 1739-95).

At this time, additional investigation is required to define the extent and severity of the release. The investigation shall be in the form of a Soil and Water Investigation, or SWI. The information gathered through the SWI will be used to choose an appropriate course of action to remediate the site, if deemed necessary. The SWI must be done in accordance with the Regional Water Quality Control Board (RWQCB) Staff Recommendations for the Initial Evaluation and Investigation of Underground Tanks, and Article 11 of Title 23, California Code of Regulations. The major elements of the SWI are summarized in the enclosed Appendix A.

The SWI proposal is due **within 45 days** of the date of this letter (**by May 25, 1998**). Once the proposal is approved, field work should commence within 60 days. A report must be submitted within 45 days after the completion of this phase of work at the site. Subsequent reports are to be submitted quarterly until this site qualifies for RWQCB "sign off." All reports and proposals must be submitted under seal of a California Registered Geologist, Certified Engineering Geologist, or Registered Civil Engineer. **Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be requested in writing and agreed to by this agency.**

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

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

Enclosure
Appendix A

c: Dick Pantages, Alameda County Environmental Health Services
Alex Perez, Shell Oil Co.

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓ R02441

R02889

RAFAT A. SHAHID, DIRECTOR

September 28, 1995

Mr. Dan Kirk
Shell Oil Company
P.O. Box 4023
Concord, CA 94520

DEPARTMENT OF ENVIRONMENTAL HEALTH

1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

STID 3672

Re: Work plan for investigations at Shell Service Station WIC #204-5508-2808, located at 9750 Golf Links Road, Oakland, California

Dear Mr. Kirk,

This office has reviewed Weiss Associates' Subsurface Investigation and Site Closure Workplan, dated September 18, 1995, for the above site. This work plan is acceptable to this office with the following additional requirements:

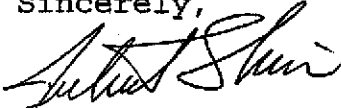
- o The work plan states that no further analysis for chromium needs to be conducted, based on Section 66261.24(a)(2)(A), Chapter 11, Division 4.5, Title 22, California Code of Regulations. However, in order for this Section of Title 22 to apply to this site, both a TCLP and WET (STLC) analysis needs to be conducted for chromium, which have not yet been conducted at the site. If a TCLP analysis is not conducted, than the California default value to be utilized would be the 5 mg/l value listed in Table II, Section 66261.24(a)(2)(A). Based on the fact that a TCLP analysis for chromium has not yet been conducted at the site, and the level of chromium in the site soil has exceeded ten times the STLC of 5 mg/l, this office is requesting that the future groundwater sample(s) be analyzed for dissolved chromium, as well as Oil & Grease, TPHg, TPHd, and BTEX.
- o What references were used to obtain the "assumed" groundwater gradient direction? Please provide this office with the references or more explanation as to why the groundwater is most likely flowing to the west.

Please submit an addendum to the work plan, addressing the above concerns, within 30 days of the date of this letter.

If you have any questions or comments, please contact me at (510) 567-6763.

Mr. Dan Kirk
Re: 9750 Golf Links Rd.
September 28, 1995
Page 2 of 2

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: Tim R. Utterback
Weiss Associates
5500 Shellmound St.
Emeryville, CA 94608-2411

Peter McKereghan
Weiss Associates
5500 Shellmound St.
Emeryville, CA 94608-2411

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



✓ R02441 (LOP)
R02889 (LOP)

RAFAT A. SHAHID, DIRECTOR

October 31, 1995

Mr. Dan Kirk
Shell Oil Company
P.O. Box 4023
Concord, CA 94520

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

STID 3672

Re: Subsurface Investigation Workplan Addendum for Shell
Service Station WIC #204-5508-2808, located at 9750 Golf
Links Road, Oakland, California

Dear Mr. Kirk,

This office has reviewed over Weiss Associates' Subsurface Investigation Workplan Addendum, dated October 24, 1995, for the above site. To iterate the meaning of Section 66261.24 (a) (2) (A), Chapter 11, Division 4.5, Title 22 California Code of Regulations, if the TCLP analysis result is less than 5 mg/l and the STLC result is less than 560 mg/l, the concentrations of chromium in soil would not be considered a threat to groundwater. However, if you have STLC results exceeding 560 mg/l, the chromium concentrations would be considered non-RCRA hazardous waste (i.e., California hazardous waste).

If elevated contaminant levels are identified in the soil or groundwater in the proposed phase of work, additional investigations may be required.

Field work shall commence within 45 days after the date of this letter. A report documenting the work shall be submitted to this office within 45 days after completing field activities.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,


Juliet Shin
Senior Hazardous Materials Specialist

cc: ^{TRH} Tim R. Utterback
Weiss Associates
5500 Shellmound St.
Emeryville, CA 94608-2411

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



✓ R02441 (LOP)

R02889 (LOP)

RAFAT A. SHAHID, Assistant Agency Director

August 8, 1995

Mr. Dan Kirk
Shell Oil Company
P.O. Box 4023
Concord, CA 94520

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

CC4586

Re: Investigations at Shell Service Station WIC #204-5508-2808,
located at 9750 Golf Links Road, Oakland, California

Dear Mr. Kirk,

This office has reviewed Weiss Associate's (Weiss) Tank Removal Closure Report, dated July 6, 1995, for the above site. Per the report, a 550-gallon waste oil tank was removed from the site on March 7, 1995. Per Alameda County's inspection report, several holes, up to 1/2-inch in diameter, were noted on the sides, bottom, and top of the tank. Additionally, stained soils and strong odors were noted down to at least 9-feet below ground surface (bgs) in the tank pit. The results of the initial soil sample, collected from beneath the tank at 7-feet bgs, identified up to 12,000 parts per million (ppm) Oil & Grease, 3,900 ppm TPH as diesel, 190 ppm TPH as gasoline, and 0.43 ppm toluene. After overexcavation down to 11-feet bgs, upto 62 ppm Oil & Grease and 0.083 ppm toluene were identified in a confirmatory soil sample.

Based on the above information, you are required to conduct investigations at the site to confirm that groundwater has not been impacted. You will be required to analyze future samples for Oil & Grease, TPH as gasoline and diesel, BTEX, and PCBs. Additionally, based on the fact that soil samples collected from the former tank pit identified levels of chromium exceeding ten times the STLC, you will be required to analyze future samples for heavy metals.

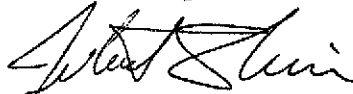
Although the report states that a total of 75 cubic yards of soil was hauled off site, this office has not yet received copies of the manifests that document this disposal. Please submit these manifests within 30 days of the date of this letter.

A work plan addressing groundwater investigations at the site shall be submitted to this office within 45 days of the date of this letter.

If you have any questions or comments, please contact me at (510) 567-6763.

Mr. Dan Kirk
Re: 9750 Golf Links Rd.
August 8, 1995
Page 2 of 2

Sincerely,



Juliet Shin
Senior Hazardous Materials Specialist

cc: Tim R. Utterback
Weiss Associates
5500 Shellmound St.
Emeryville, CA 94608-2411

Acting Chief-File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02889
✓ R02441

November 8, 1990

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

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

**RE: Underground Storage Tank Permitting
M and S Shell, 9750 Golf Links Road
Oakland, California 94605**

Dear Ms. Foster:

This letter is in regards to the issuance of a five year permit to operate the three underground storage tanks at the above mentioned facility. Our office had requested information pertaining to the quarterly inventory monitoring reports (October thru December 1989), for the three underground tanks. We received the information we requested from Shell Oil Company.

As a reminder, please be aware that you are required to report on your quarterly monitoring report any daily inventory swings which exceed the allowable levels specified in Section 2641 (5) (b) of the California Code of regulations, Title 23, Chapter 3, Subchapter 16, Underground Tank Regulations. An explanation in writing as to the cause of the variation should also be submitted to this office. All records must be maintained on site for the last three years.

Enclosed is a five year permit to operate the four underground tanks.

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

Sincerely,

Susan L. Hugo
Hazardous Materials Specialist

Enclosures (2)

cc: Mr. Robert G. Wallin, Shell Area Manager
Mr. Mohammad Mashoon, Dealer

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R02889
✓ R02441

April 5, 1990

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

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

RE: Underground Tank Issuance of Five Year Permit

Dear Ms. Foster:

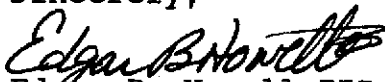
An underground tank inspection was conducted at M & S Shell located at 9750 Golf Links Rd., Oakland, CA 94605 on February 1, 1990 by Susan Hugo of our department.

The California Code of Regulations, Title 23, Chapter 3, Subchapter 16, Underground Tank Regulations, Section 2641 (5) (b) requires that any inventory swings which exceed the allowable levels must be justified as to the cause of the variations. Upon reviewing your quarterly monitoring report (October thru December 1989), it showed inventory swings exceeding the allowable levels. Please submit to this office an explanation in writing as to the cause of the variations.

The Five Year permit will be issued as soon as the department receives the above mentioned document.

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

Sincerely,


Edgar B. Howell III, Chief
Hazardous Materials Division

EBH:SH:sh

cc: Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Ken Lottinger, Area Manager, Shell Oil Company
Mohammad Mashoon, Dealer
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

R02889
✓R02441

Telephone Number: (415) 271-4320

August 31, 1988

Shell Service Station
9750 Golf Link Rd.
Oakland, CA 94605

SUBJECT: UNDERGROUND STORAGE UNAUTHORIZED RELEASE (LEAK)
CONTAMINATION SITE REPORT

Dear Sir:

Our office received a report of a failed underground storage tank test from Hunter Environmental Services, Inc. The California Administrative Code, Title 23, requires all unauthorized releases to be reported. Section 2652(b) requires within 5 working days of detecting the release, the operator or permittee shall submit to the local agency (Alameda County Hazardous Materials Division) a full written report to include all of the following information which is known at the time of filing the report:

- 1) List of type and quantity of hazardous substances released.
- 2) The results of all investigations completed at that time to determine the extent of soil or groundwater or surface water contamination due to the release.
- 3) Method of cleanup implemented to date, proposed cleanup actions, and approximate cost of actions taken to date.
- 4) Method and location of disposal of the released hazardous substance and any contaminated soils or groundwater or surface water (indicate whether a hazardous waste manifest(s) is utilized).
- 5) Proposed method of repair or replacement of the primary and secondary containers.
- 6) Facility operator's name and telephone number.

R02889

R02441

Shell Service Station
9750 Golf Link Rd.
Oakland, CA 94605
Page 2 of 2
August 31, 1988

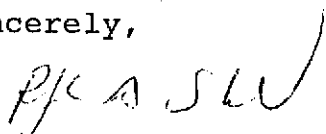
Until cleanup is complete, the operator or permittee shall submit reports to the County and the Regional Water Quality Control Board (RWQCB) every 3 months or at a more frequent interval if specified by either agency. The reports shall include the information requested in 2, 3, and 4 of the above. The report requested above shall be prepared in accordance with the San Francisco Regional Water Quality Control Board's "Guidelines for Addressing Fuel Leaks," September 1985. The initial investigation report shall be submitted within 30 days and shall include a site safety plan.

Soils contaminated at hazardous waste concentrations shall be transported by a licensed hazardous hauler and disposed of or treated at a California Department of Health Services approved facility. Soils contaminated below hazardous waste concentrations may be managed as non-hazardous but are subject to waste discharge requirements of the Regional Board.

Enclosed in an "Underground Storage Tank Unauthorized Release (Leak)/ Contamination Site Report" which should be completed and returned within 5 working days.

Should you have any questions regarding this letter, please contact Lowell Miller, Senior Hazardous Materials Specialist at 415/271-4320.

Sincerely,



Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:LM:mam

Enclosure