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Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

Re: Shell-branded Service Station
3750 International Boulevard
Oakland, California
SAP Code 135682
Incident No. 98995743
ACHCSA No. RO0002986

Dear Mr. Wickham:

The attached document is provided for your review and comment. Upon information and belief, I declare, under penalty of perjury, that the information contained in the attached document is true and correct.

If you have any questions or concerns, please call me at (707) 865-0251.

Sincerely,

Denis L. Brown
Project Manager

CONESTOGA-ROVERS
& ASSOCIATES

5900 Hollis Street, Suite A, Emeryville, Calfornia 94608
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May 12, 2009 Reference No. 060364

Mr. Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Dear Mr. Wickham:

Re: Closure Request
Shell-branded Service Station
3750 International Boulevard
Oakland, California
SAP Code 135682
Incident No. 98995743
Agency No. RO0002986

Conestoga-Rovers & Associates (CRA) prepared this letter on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell) to request that Alameda County Environmental Health (ACEH) review this case for closure.

Following a phase II environmental assessment conducted at the subject site during August 2008, ACEH requested that a work plan proposing a soil and groundwater investigation be submitted by May 12, 2009 in their February 26, 2009 letter. Based on our review of historical soil and groundwater data for the site, CRA believes that no further action is warranted.

A summary of previous work performed at the site and additional background information is presented in Attachment A.

Data collected during the recent phase II investigation indicate that none of the soil samples contained any constituent concentrations exceeding the San Francisco Bay Regional Water Quality Control Board (RWQCB) environmental screening levels (ESLs)[1] for shallow or deep soil where groundwater is a current or potential drinking water source for residential land use.

None of the grab groundwater samples collected during the phase II investigation contained concentrations of any constituents exceeding ESLs with the following exceptions:

- Total petroleum hydrocarbons as gasoline (TPHg) concentrations in borings B-1 (200 micrograms per liter [µg/l]), B-2 (3,900 µg/l), and B-5(180 µg/l);
- A single benzene concentration from boring B-2 (17 µg/l); and
- A single methyl tertiary butyl ether (MTBE) concentration from boring B-1 (5.8 µg/l).

These TPHg and benzene concentrations are within historical ranges observed during groundwater monitoring in the 1990s, suggesting that these detections do not represent a new release. MTBE was not analyzed previously (the case was closed in 1997). RWQCB guidance[1] advises that, "TPH ESLs must be used in conjunction with ESLs for related chemicals (e.g., BTEX, PAHs, oxidizers, etc.)." CRA notes that the single benzene concentration that exceeds ESLs is located in the center of the subject site, near the former and existing underground storage tanks, and that this detection is delineated on site in the down gradient direction by boring B-1. The MTBE detection in B-1 is very close to the ESL (5.0 µg/l). Since MTBE has been removed from gasoline, it is likely that it will continue to decrease to concentrations below the ESL within a reasonable time frame. The phase II investigation did not identify any potential sensitive receptors or water wells in the vicinity of the site.

Based on the data from the phase II investigation, historical data, and the lack of potential receptors, CRA requests closure of this environmental case.

Please call Peter Schaefer at (510) 420-3319 if you have any questions or comments.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Peter Schaefer, CEG, CHG

Aubrey K. Cool, PG


PS/aa/1
Encl.

c.c.: Denis Brown, Shell Oil Products US, 20945 S. Wilmington Avenue, Carson, CA 90810

1 *Screening for Environmental Concerns at Sites With Contaminated Soil and Groundwater*, California Regional Water Quality Control Board, Interim Final - November 2007 [Revised May 2008]

# ATTACHMENT A

# SITE HISTORY

## SITE HISTORY

***1981 Tank Replacement:*** Shell installed three fiberglass underground storage tanks (USTs) which apparently replaced three former steel USTs. No information is available concerning the tank removal.

***1986 Waste Oil UST Replacement:*** Petroleum Engineering of Santa Rosa, California removed a steel 550-gallon waste oil UST and installed a 550-gallon fiberglass waste oil UST. Blaine Technical Services of San Jose, California (BTS) collected a soil sample from the middle of the tank excavation at a depth of 7 feet below grade (fbg) which contained a concentration of 117.4 milligrams per kilogram (mg/kg) of total oil and grease (TOG). BTS's November 2, 1986 *Sampling Report* provides these results.

***1989 Subsurface Investigation:*** Weiss Associates (WA) of Emeryville, California installed monitoring wells MW-1 through MW-3. Soil samples from the well borings contained concentrations of total petroleum hydrocarbons as gasoline (TPHg) up to 130 mg/kg and of benzene up to 0.032 mg/kg. Total petroleum hydrocarbons as diesel (TPHd), volatile organic compounds (VOCs), and TOG were not detected in the soil samples. WA's July 18, 1990 *Subsurface Investigation* details these results.

***1990 Well Survey:*** WA conducted a well survey which identified an irrigation well located approximately 1 block east (up- and cross-gradient). No domestic or municipal wells were identified within one-half mile of the site. WA's July 18, 1990 *Subsurface Investigation* summarizes the survey results.

***1991 UST Unauthorized Release (Leak)/Contamination Site Report (URR):*** On February 6, 1991 Shell filed a URR based on the waste oil UST investigation results.

***1992 Well Installation:*** WA installed groundwater monitoring well MW-4 immediately down gradient of the UST complex. Soil samples from the well boring contained concentrations of TPHg up to 6.4 mg/kg. No benzene was detected in the soil samples. WA's September 8, 1992 *Subsurface Investigation* provides details of the well installation.

***Groundwater Monitoring:*** Groundwater monitoring was conducted between 1990 and 1996. Depth to groundwater varied from 6 to 16 fbg. The highest concentration of TPHg detected was 12,000 micrograms per liter (µg/l) in MW-3 (first quarter 1994) and the highest level of benzene detected was 210 µg/l in MW-4 (third quarter 19920). Concentrations in the first quarter of 1996 had dropped to 1,500 µg/l of TPHg and 4.1 µg/l of benzene.

***1997 Environmental Case Closure:*** Alameda County Health Care Services Agency's (ACHCSA's) October 3, 1997 granted closure of the UST fuel leak case. The closure was requested in WA's April 2, 1996 *Case Closure Request.*

***2004 Dispenser Replacement Soil Sampling:*** During July of 2004 Paradiso Mechanical Inc. (Paradiso) upgraded the facility's fuel system. Cambria Environmental Technology, Inc. (Cambria) collected soil samples from beneath each dispenser. No TPHg, benzene, toluene, ethylbenzene, xylenes, and methyl tertiary-butyl ether (MTBE) were detected in the soil samples. Cambria's November 23, 2004 *Dispenser Upgrade Sampling Report* details these results.

***2006 Waste Oil UST Removal:*** In May 2006 Wayne Perry Inc. removed one 550-gallon dual-wall fiber glass waste oil UST. One soil sample was collected from the excavation contained concentrations up to 28 mg/kg TOG and 7.5 mg/kg TPHd. Based on these results Cambria filed a UST unauthorized release report on June 6, 2006. CRA's July 31, 2006 *UST Removal Report* summarizes the tank removal activities and sampling results.

***2008 Phase II Environmental Site Assessment:*** In August of 2008 Delta Consultants, Inc. (Delta) drilled five borings to collect grab groundwater samples. Three of the five samples contained concentrations of TPHg ranging from 180 to 3,900 µg/l. Benzene (17 µg/l) and MTBE (5.8 µg/l) were each detected in one grab groundwater sample. Details of the investigation are provided in Delta's October 1, 2008 *Phase II Environmental Site Assessment.*