01-1369 No Further Action package, Shell, 4695 Thornton Ave. Fremont

Lambert, Ralph@Waterboards <ralph.lambert@waterboards.ca.gov>

Thu 3/16/2017 9:04 AM

Inbox

To: Andrea.wing@shell.com <Andrea.wing@shell.com>; jnhproperties@hotmail.com <jnhproperties@hotmail.com>; sara.heikkila@aecom.com <sara.heikkila@aecom.com>;

Cc: Reich, Micah@Waterboards <Micah.Reich@waterboards.ca.gov>; jswardenski@fremont.gov <jswardenski@fremont.gov>; Rangarajan.sampath@acwd.com <Rangarajan.sampath@acwd.com>; Michelle Myers (Michelle.Myers@acwd.com) <Michelle.Myers@acwd.com>;

1 attachments (7 MB)

01-1369 - NFA package 3-16-17.pdf;

Please see the attached NFA package.

Ralph Lambert, PG, CHg
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay St., Suite 1400
Oakland, CA 94612

(510) 622-2382

March 16, 2017
File No. 01-1369 (RAL)
ACWD No. 0100

Equilon Enterprises LLC
Attn: Ms Andrea Wing
20945 South Wilmington Avenue
Carson, CA 90810
Sent via email to Andrea.wing@shell.com

SUBJECT: **Transmittal of Closure Letter for Former Shell Station, 4695 Thornton Avenue, Fremont, Alameda County**

Dear Ms. Wing:

Attached please find the uniform underground storage tank closure letter and the case closure summary for the subject Site. The current record fee title owners were notified of the proposed closure in accordance with Section 25296.20 of Chapter 6.7 of the health and Safety Code. We sent a public notification of the proposed case closure to all interested parties, which included a 60-day public comment period. No comments were received.

Based on the site-specific information and data available in GeoTracker and the Regional Water Board's case file, we conclude that this case meets all the criteria of the State Water Board's *Low-Threat Underground Storage Tank Case Closure Policy*[1] (Policy) and that a No Further Action determination is appropriate.

There may be residual petroleum-contaminated soil, soil vapor, and groundwater at this site that could pose an unacceptable risk as a result of future construction/redevelopment activities, such as onsite excavation activities, the installation of water wells at or near the site, or change to a more sensitive land use. Contractors performing subsurface activities at the site should be prepared to encounter soil, vapor, and groundwater contaminated with petroleum hydrocarbons, and any encountered pollution should be managed properly to avoid threats to human health or the environment. Proper management may include sampling, risk assessment, additional cleanup work, mitigation measures, or some combination of these tasks.

[1] See State Water Resources Control Board webpage: http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

If you have any questions, please contact Mr. Ralph Lambert of my staff at (510) 622-2382 [e-mail ralambert@waterboards.ca.gov].

Sincerely,

Digitally signed by Stephen Hill
Date: 2017.03.16 08:43:21 -07'00'

Bruce H. Wolfe
Executive Officer

Attachments:
Case closure letter
Case closure summary

Copy sent via email with attachments:
Mr. James Hardwick
Property Owner
Email: Jnhproperties@hotmail.com

State Water Resources Control Board
UST Cleanup Fund Unit
Attn.: Mr. Micha Reich
E-mail: Micah.Reich@waterboards.ca.gov

City of Freemont
Attn.: Mr. Jay Swardenski
Email: JSwardenski@fremont.gov

Alameda County Water District
Attn.: Mr. Ranga Sampath
Email: Rangaraian.Sampath@acwd.com

AECOM
Attn.: Ms. Sara Heikkila
Email: Sara.Heikkila@aecom.com

Water Boards

San Francisco Bay Regional Water Quality Control Board

March 16, 2017
File No. 01-1369 (RAL)
ACWD No. 0100

Equilon Enterprises LLC
Attn: Ms Andrea Wing
20945 South Wilmington Avenue
Carson, CA 90810
Sent via email to: Andrea.wing@shell.com

SUBJECT: Closure Letter for Former Shell Station, 4695 Thornton Avenue, Fremont, Alameda County

Dear Ms. Wing:

This letter confirms the completion of a site investigation and corrective action for the underground storage tank(s) formerly located at the above-described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former underground storage tank(s) are greatly appreciated. Based on information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your underground storage tank(s) site is in compliance with the requirements of subdivisions (a) and (b) of Section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to Section 25299.3 of the Health and Safety Code and that no further action related to the petroleum release(s) at the site is required.

This notice is issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code.

Please be aware that claims for reimbursement of corrective action costs submitted to the Underground Storage Tank Cleanup Fund more than 365 days after the date of this letter or issuance or activation of the Fund's Letter of Commitment, whichever occurs later, will not be reimbursed unless one of the following exceptions applies:

- Claims are submitted pursuant to Section 25299.57, subdivision (k) (reopened UST case); or
- Submission within the timeframe was beyond the claimant's reasonable control, ongoing work is required for closure that will result in the submission of claims beyond that time period, or that under the circumstances of the case, it would be unreasonable or inequitable to impose the 365-day time period.

Case Closure Summary
Leaking Underground Fuel Tank Program

I. Agency Information — Date: March 2, 2017

Agency Name:	*Alameda County Water District*	Address:	*43885 South Grimmer Boulevard*
City, State, ZIP:	*Fremont, CA 94538*	Phone:	*(510) 668-4442*
Staff Person:	*Thomas J. Berkins*	Title:	*Groundwater Resources Engineer*

II. Site Information

Site Facility Name: *Shell Station - 4695 Thornton Avenue*			
Site Facility Address: *4695 Thornton Avenue, Fremont, CA 94536 (See Figure 1)*			
Local Case No: *0100*	Regional Board Case No: *01-1369*	GeoTracker ID: *T0600101264*	
Unauthorized Release Form Filing Date: *September 27, 1990*		Cleanup Fund Number: *Not Applicable (NA)*	
Responsible Party	Address	Phone Number	Email Address
Equilon Enterprises LLC dba Shell Oil Products US Contact: Andrea Wing	*20945 S. Wilmington Avenue Carson, CA 90810*	*(714) 731-1050*	*andrea.wing@shell.com*
Property Owner	Address	Phone Number	Email Address
James Hardwick	*4673 Thornton Avenue, Suite A Fremont, CA 94536*	*(510) 791-9048*	*jnhproperties@hotmail.com*

Tank Number	Size (gallons)	Contents	Type of Underground Storage Tank (UST)	Closed In Place/ Removed/Existing	Date
1	*7,500*	*Diesel*	*Single-Walled Steel*	*Removed*	*January 1985*
2	*5,000*	*Diesel*	*Single-walled steel with fiberglass lining*	*Removed*	*December 1, 2003*
3	*5,000*	*Gasoline*	*Single-walled steel with fiberglass lining*	*Removed*	*December 3, 2003*
4	*7,500*	*Gasoline*	*Single-walled steel with fiberglass lining*	*Removed*	*December 3, 2003*
5	*10,000*	*Gasoline*	*Double-walled fiberglass*	*Removed*	*March 5, 2004*

III. Release and Site Characterization Information

Cause and Type of Release: *Leaking Fuel Tank System*		
Site Characterization Complete? *Yes*	Investigative Methods Appropriate? *Yes*	
Monitoring Wells Installed? *Yes*	Total No: *13*	Proper Screened Interval? *Yes*
Highest Groundwater Depth Below Ground Surface (bgs): *20.98 feet*	Lowest Groundwater Depth Below Ground Surface: *39.64 feet*	Flow Direction: *West-Southwest*
Most Sensitive Current Groundwater Use: *Potential drinking water source*		
Most Sensitive Potential Groundwater Use: *Drinking water source* Probability of Use: *Undetermined*		
Summary of Water Wells In Vicinity: *The closest water supply well is an agricultural well located approximately 550 feet to the northeast (upgradient) of the Site.*		
Are Drinking Water Wells Affected? *No*	Aquifer Name: *Shallow Water-Bearing Zone*	
Is Surface Water Affected? *No*	Nearest Surface Water Name: *Alameda County Flood Control Channel Zone 5, Line F-1 is located approximately 1,500 feet to the southeast of the site.*	
Report(s) on file? *Yes*	Where is report filed? *Alameda County Water District (ACWD) and the State Water Resources Control Board's (State Board) GeoTracker database: http://geotracker.waterboards.ca.gov Case ID: T0600101264*	

II. Release and Site Characterization Information (Continued)

Treatment and Disposal of Affected Material			
Material	Amount (Units)	Action (Treatment or Disposal w/Destination)	Date
Free Product	*None*	*N/A*	*N/A*
Soil	*80 cubic yards*	*Soil excavated during removal of three USTs in December 2003 was disposed at Forward Landfill in Manteca, CA.*	*December 23 & 24, 2003*
Soil	*40 cubic yards*	*Soil removed during over-excavation of contaminated soil beneath the USTs and dispensers in September 2004 was disposed at Forward Landfill in Manteca, CA.*	*September 20 & 21, 2004*
Soil and Water	*Eight 55-gallon drums and 8 cubic yards*	*Soil cuttings and decontamination water from the destruction of nine monitoring wells were disposed at Altamont Landfill in Livermore, CA; DeMenno/Kerdoon facility in Compton, CA; and US Ecology in Beatty, NV*	*September 7 & 8, 2016, and November 22, 2016*
Groundwater	*61,380 gallons*	*Periodic groundwater pumping (using a vacuum truck) from select monitoring wells during October 2002 through December 2004 was disposed of at Shell Oil's refinery in Martinez, CA.*	*October 2002 – December 2004*

Maximum Documented Contaminant Concentrations---Before and After Cleanup									
Contaminant	Soil (mg/kg)		Groundwater (µg/l)		Contaminant	Soil (mg/kg)		Groundwater (µg/l)	
	Before	After	Before	After		Before	After	Before	After
TPH-gasoline	*9,900*	*2,100*	*130,000*	*830*	Toluene	*210*	*<0.20*	*4,200*	*1.3*
TPH-diesel	*6,000*	*1,200*	*1,500,000*	*520*	Ethylbenzene	*180*	*6.9*	*1,300*	*8.3*
Benzene	*10*	*<0.20*	*6,000*	*1.7*	Xylenes	*1,300*	*17*	*5,800*	*25*
MTBE	*42*	*<0.50*	*22,000*	*0.96*	TBA	*--*	*<10*	*17,000*	*<10*
Naphthalene	*--*	*8.6*	*1.6*	*1.6*					

Notes: TPH = Total petroleum hydrocarbons; mg/kg = milligrams per kilogram; µg/l = micrograms per liter; -- = Not analyzed. MTBE = Methyl tertiary butyl ether; TBA = Tertiary butyl alcohol
"Before" concentrations in soil are from soil sample TP-11, which was collected beneath the USTs at a depth of 20 feet bgs in 2004, except for TPH-diesel, which was from a sample collected from borehole SB-4 at a depth of 18.5 feet bgs in 2007.
"After" concentrations in soil are from soil samples collected from boring SB-9, which were collected beneath the southernmost former dispenser at depths of 15.5 to 29 feet bgs in 2015.
"Before" concentrations in groundwater are from samples collected from monitoring wells S-1 and S-4 during 1989 through 1992, except for MTBE and TBA, which are from samples collected during 2002 through 2005.
"After" concentrations in groundwater are from samples collected from borehole SB-9 on April 22, 2015, except for MTBE, which is from a sample collected from monitoring well S-4 on July 23, 2015.
The analytical results of all the soil and groundwater samples collected to date, as well as the figures showing sample locations, are contained in Conestoga-Rovers & Associates' "Subsurface Investigation Report" dated June 26, 2015, and GHD Services Inc.'s "Groundwater Monitoring Report - Third Quarter 2015" dated September 15, 2015, which have been uploaded to GeoTracker.

Comments:

Site History: The Site is a former Shell service station that was in operation from approximately the early 1960s to 1998. Currently, the Site is occupied by a vacant Mini Mart building with the remaining parcel consisting of an asphalt parking lot. The former service station consisted of four fuel USTs, three fuel dispenser islands, and a station building. In December 1984, a 7,500-gallon UST reportedly failed a pressure

III. Release and Site Characterization Information (Continued)

Comments (Continued):

test and was replaced with a 10,000-gallon UST in January 1985. Two groundwater monitoring wells (S-1 and S-2) and two vadose zone monitoring wells (SV-1 and SV-2) were installed at the Site in May 1985, and contamination was first discovered during sampling of the monitoring wells at that time. In December 1998, the station was closed, and fuel was removed from the USTs; however, the USTs were not removed at that time. The USTs, piping, and fuel dispensers were removed in December 2003 and March 2004. Monitoring wells S-1, S-2, and SV-1 were destroyed prior to removal of the USTs. During removal of the USTs, elevated concentrations of petroleum hydrocarbons were detected in the sidewalls of the UST pit and beneath the USTs at depths of 14 to 15 feet bgs. Therefore, in October 2004, soil excavation was conducted beneath the former USTs to a depth of approximately 20 feet bgs to remove elevated concentrations of petroleum hydrocarbons previously detected in this area. However, confirmation soil samples collected from the bottom of the excavation documented elevated concentrations of petroleum hydrocarbons remaining in soil beneath the former USTs and the southwestern dispenser. Further excavation to depths greater than 20 feet was not conducted due to the limits of the excavation equipment, on-site structures (station building and canopy), and the nearby sidewalk. The locations of all the soil samples collected beneath the USTs, dispensers, and piping, along with the soil sample results, are shown on Figure 2.

The Site has been vacant since the station closed in 1998; however, the Mini Mart building was remodeled and expanded in 2007. From 1985 to 2015, multiple investigations were conducted at the Site, including the installation of nine additional groundwater monitoring wells (S-3 through S-11), and the drilling of nineteen soil borings (S-A through S-E, and SB-1 through SB-14). The locations of all the soil borings and monitoring wells are shown on Figure 3. During these investigations, impacted soil and groundwater were primarily encountered in the vicinity of the USTs and southwestern pump island; however, groundwater contamination migrated off-site to the property across Cabrillo Drive. Groundwater monitoring and sampling has been conducted from 1985 to 2015. Based on the most recent groundwater samples collected from the monitoring wells on July 23, 2015, residual groundwater contamination is limited to an area on-site in the vicinity of monitoring well S-4 and borehole SB-9, as shown on the attached Figure 4.

IV. Low-Threat UST Case Closure Policy Review

In accordance with the State Water Resources Control Board's (State Board) "Low-Threat UST Case Closure Policy" (Policy), ACWD reviewed the case files for this site and determined that the site meets all eight General Criteria and all three Media-Specific Criteria of the Policy and is eligible for closure, as follows:

General Criteria:

a. *The unauthorized release is located within the service area of a public water system (Alameda County Water District);*
b. *The unauthorized release consists only of petroleum;*
c. *The unauthorized ("primary") release from the UST system has been stopped (All USTs have been removed;*
d. *Free product has been removed to the maximum extent practicable (No free product is currently observed at the site);*
e. *A conceptual site model that assesses the nature, extent, and mobility of the release has been developed;*

IV. Low-Threat UST Case Closure Policy Review (Continued)

General Criteria (Continued):

f. Secondary source has been removed to the extent practicable (contaminated soil beneath the USTs and piping was excavated and disposed off-site);
g. Soil and groundwater have been tested for MTBE and results reported in accordance with Health & Safety Code Section 25296.15; and
h. Nuisance as defined by Water Code Section 13050 does not exist at the site.

Media-Specific Criteria:

1. *Groundwater: The site satisfies the media-specific criteria for groundwater since the contaminant plume that exceeds water quality objectives is stable and decreasing in areal extent, and meets all of the other additional characteristics of Class 1, as follows: a) the contaminant plume that exceeds water quality objectives is less than 100 feet in length; b) there is no free product; and c) the nearest existing water supply well or surface water body is greater than 250 feet from the defined plume boundary.*

2. *Petroleum Vapor Intrusion to Indoor Air: The site satisfies the media-specific criteria for petroleum vapor intrusion to indoor air based on site-specific conditions that satisfy all of the characteristics and criteria of Scenario 3, including benzene concentrations less than 100 µg/l in groundwater, and a) the bioattenuation zone (0 - 5 feet bgs) provides a separation of at least 5 feet vertically between the dissolved phase benzene and the foundation of existing or potential buildings; and b) total TPH (gasoline and diesel combined) are less than 100 mg/kg in soil throughout the entire depth of the bioattenuation zone.*

3. *Direct Contact and Outdoor Air Exposure: The site satisfies media-specific criteria 3.a. for direct contact and outdoor air exposure since the current maximum concentrations of benzene, ethylbenzene, and naphthalene detected in soil samples collected at depths less than 10 feet bgs were all less than the Residential, Commercial/Industrial and Utility Worker thresholds listed in Table 1 of the Policy.*

Residual Contamination:

Although this Site satisfies the media-specific criteria of the Policy (i.e., groundwater, vapor intrusion to indoor air, and direct contact and outdoor air exposure), the Policy allows elevated concentrations of petroleum hydrocarbons to remain at the site provided that the criteria in the Policy are satisfied at the time of closure. The following is a summary of the contaminants remaining at the site, which may require the implementation of the "Site Management Requirements" outlined in Section V., Closure:

Soil: The concentrations of all petroleum hydrocarbons detected in soil at depths less than 10 feet bgs are less than the criteria in the Policy for direct contact and outdoor air exposure; however, the concentrations of petroleum hydrocarbon constituents detected in soil samples collected at depths of 15 to 30 feet bgs may pose a threat for groundwater protection (see Groundwater discussion below).

Vapor: Although the site satisfies the media-specific criteria for petroleum vapor intrusion to indoor air, no soil gas samples have ever been collected at the site. Therefore, if the site is redeveloped for residential use, a vapor intrusion investigation is recommended.

IV. Low-Threat UST Case Closure Policy Review (Continued)

Residual Contamination (Continued):

Groundwater: Despite meeting the Policy's groundwater criteria, groundwater samples collected from boreholes drilled at the Site on April 22, 2015, documented a concentration of benzene at 1.7µg/l, which exceeds the State of California's drinking water standard of 1 µg/l for benzene. In addition, concentrations of TPH-gasoline (830 µg/l) and TPH-diesel (520 µg/l) were detected in groundwater, which exceed the taste and odor threshold (100 µg/l) for groundwater. Therefore, prior to any proposed use of shallow groundwater (e.g., use of a water well) at the site, groundwater samples should be collected to confirm that groundwater is not impacted by petroleum hydrocarbons, which could impact its intended use.

V. Closure

Does the completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? *Yes*

Does the completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? *Yes*

Site Management Requirements: *Residual contamination in both soil and groundwater remains at the Site that could pose an unacceptable risk under certain development activities such as grading, excavation, or installation of water wells. Therefore, the impact of the disturbance of any residual contamination or the installation of a water well near the residual contamination should be assessed and appropriate action taken so that there is no significant impact to human health, safety or the environment. This could necessitate additional sampling, health risk assessment, and mitigation measures. ACWD and the appropriate planning and building department should be notified prior to any changes in land use, grading activities, excavation, and installation of water wells. This notification should include a statement that residual contamination exists on the property and list all mitigation actions, if any, necessary to ensure compliance with this site management requirement. The levels of residual contamination and any associated site risks are expected to reduce with time.*

Should corrective action be reviewed if land use changes? *Yes*

Monitoring wells destroyed? *Yes*	Number destroyed: *15*	Number remaining: *0*
List Enforcement Actions Taken: *None*	List Enforcement Actions Rescinded: *N/A*	

Were all of the current record fee title owners notified of the proposed closure in accordance with Section 25297.15(a) of Chapter 6.7 of the Health and Safety Code? *Yes. In addition, on February 26, 2016, a public notification of the proposed case closure was distributed to all interested parties in accordance with the requirements of the Low-Threat Closure Policy, which included a 60-day public comment period. No comments were received regarding the proposed closure. All of the remaining monitoring wells (S-2 through S-11, and SV-2) were properly destroyed on June 14-16, 2016, except for well S-6, which was destroyed on October 18, 2016. All waste piles, drums, debris, and other investigation or remediation derived materials were removed from the site during September 2016 through November 2016, and disposed at three separate waste disposal facilities in California and Nevada.*

VI. Local Agency Representative Data

Prepared by: *Thomas J. Berkins*	Title: *Groundwater Resources Engineer*
Signature: D. Ranger / for	
Reviewed by: *Michelle A. Myers*	Title: *Groundwater Resources Manager*
Signature: Michelle A. Myers	

ALAMEDA COUNTY WATER DISTRICT
43885 SOUTH GRIMMER BOULEVARD • P.O. BOX 5110, FREMONT, CALIFORNIA 94537-5110
(510) 668-4200 • FAX (510) 770-1793 • www.acwd.org

March 2, 2017

Mr. Bruce H. Wolfe
Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Attention: Ralph Lambert

Subject: Recommendation for Leaking Underground Fuel Tank Case Closure of Shell Station, 4695 Thornton Avenue, Fremont (ACWD Site #0100)

After reviewing the Alameda County Water District (ACWD) file on the fuel release which occurred at the former Shell Service Station site located at 4695 Thornton Avenue, Fremont, it does not appear that further monitoring, investigation, or remedial actions are necessary to protect the beneficial uses of our groundwater basin. Therefore, as specified in our June 27, 1996, Cooperative Agreement, ACWD recommends that no further action be required and that the Regional Water Quality Control Board close this case with a case closure letter.

Enclosed is our Leaking Underground Fuel Tank Case Closure Summary for this site. It should be noted that in the enclosed summary, site management requirements for vapor and groundwater are recommended. If you have any questions regarding this matter, please contact Michelle Myers at (510) 668-4454.

Sincerely,

Steven D. Inn
Manager of Water Resources

tb/tf
Enclosure
cc: Jay Swardenski, Fremont Fire Department
James Hardwick, Property Owner
Andrea Wing, Equilon Enterprises LLC (dba Shell Oil Products US)
Michelle A. Myers, ACWD
Thomas J. Berkins, ACWD

RECYCLED PAPER