

California Regional Water Quality Control Board
North Coast Region

Cleanup and Abatement Order 98-128

for

Shell Oil Company
Equilon Enterprises LLC

255 Dutton Avenue
Santa Rosa, California

Sonoma County

The Regional Water Quality Control Board, North Coast Region, (hereinafter RWQCB) finds that:

1. In 1962, Shell Oil Products Company (hereinafter Shell) purchased property located at 255 Dutton Avenue in Santa Rosa, Sonoma County, California. Shell constructed a bulk petroleum facility at the site on 257 Dutton Avenue in 1962, and constructed a service station at 255 Dutton Avenue sometime prior to 1970.
2. In 1996, Shell purchased a 25-foot wide strip of land on the former bulk petroleum facility property at 257 Dutton Avenue. This strip of land is located along the western edge of the former bulk petroleum facility property, along the boundary between the 257 Dutton Avenue property and the service station at 255 Dutton Avenue.
3. Prior to 1987, Shell operated the facility as a motor vehicle repair facility and service station. In 1984, a waste oil tank was removed, and in 1986 a pipeline leak was reported. Hydrocarbons were detected in soils at the service station in 1986 when the service station island was updated and rebuilt. In October 1998, two 5,000 gallon and two 7,500 gallon underground tanks were removed and replaced with three 10,000 gallon underground tanks.
4. Discharges of waste from operations at the service station were deposited on and about the parcel at 255 Dutton Avenue. Due to ownership of the property or operation of facilities, Shell had control of the discharges at 255 Dutton Avenue and is hereinafter referred to as a discharger. In 1998, Shell Oil Products Company and Texaco Refining and Marketing Incorporated merged to form Equilon Enterprises LLC (Equilon). As the successor to Shell, Equilon is hereinafter referred to as a discharger. The facility is currently operated as a retail fuel station.
5. Shell Oil Company commenced an investigation of the petroleum releases at the 255 Dutton site in 1988. Since that time, eighteen monitoring wells and one extraction well were installed to investigate and monitor contamination at the site. Monitoring data indicates that free floating gasoline product is present in groundwater at the site. Dissolved diesel and motor oil are also present in groundwater. Benzene has been detected in concentrations as high as 19,000 Tg/L (parts per billion, ppb). The maximum contaminant level for benzene established for drinking water for the protection of public health is 1 ppb. Methyl tert-Butyl Ether (MTBE) has been detected in concentrations as

high as 100,000 ppb. The United States Environmental Protection Agency's health advisory for MTBE is 35 ppb.

6. Groundwater contamination originating on or about 255 Dutton Avenue is co-mingled with groundwater contamination originating on or about 257 Dutton Avenue. Cleanup work at the two sites needs to be coordinated to ensure complete definition of the extent of contamination and adequate cleanup.
7. Nearby domestic wells, including wells at 258 and 270 Dutton Avenue have been contaminated with carbon tetrachloride at up to 19 ppb, which is in excess of the maximum contaminant level of 0.5 ppb established for drinking water for the protection of public health.
8. The site overlies shallow groundwater which at times is less than five feet below ground surface.
9. The beneficial uses of areal groundwaters include:
 - a. municipal and domestic supply
 - b. agricultural supply
 - c. industrial service supply
10. Carbon tetrachloride and benzene are carcinogenic substances, and the maximum contaminant levels developed by the State Department of Health Services for protection of public health are 0.5 ppb and 1.0 ppb respectively. Discharges of petroleum products and chlorinated solvents are in violation of the Water Quality Control Plan for the North Coast Region. The discharge and threatened discharge of petroleum products, solvents and other wastes have unreasonably affected water quality in that it is deleterious to the above described beneficial uses, and threatens to impair water quality to a degree which has created or may create a condition of pollution or nuisance and which threatens to continue unless the discharge or threatened discharge is permanently abated or cleaned up.
11. This enforcement action is being taken for the protection of the environment and, therefore, is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with Section 15308, Chapter 3, Title 14, of the California Code of Regulations.

THEREFORE, IT IS HEREBY ORDERED that Order No. 94-67 is rescinded and it is further ordered that, pursuant to California Water Code Section 13304, the discharger shall cleanup and abate the discharge and threatened discharge and shall comply with the provisions of this Order:

1. The discharger shall conduct all work under the direction of a California registered engineer or geologist familiar with soil and groundwater investigations.
2. Monitoring wells MW-16, MW-17, and MW-18 are positioned for the purpose of monitoring the downgradient extent of groundwater contamination. MTBE has been detected in monitoring well MW-18 at concentrations as high as 62 ppb. MTBE has been

detected in monitoring well MW-12, within 50 feet and upgradient of MW-18, at concentrations as high as 9,300 ppb. The rapid decline of MTBE, gasoline and related compounds detected between monitoring wells MW-12 and MW-18 requires assessment. The decline in concentration may indicate that a preferential pathway exists in this area, the vertical extent of the contamination is not adequately defined, and/or MW-16, MW-17 and MW-18 are not adequate downgradient monitoring wells. A technical assessment related to the attenuation and extent of groundwater contamination shall be submitted to the Executive Officer on or before March 15, 1999.

3. The discharger shall submit to the Executive Officer on or before June 15, 1999, a remedial action plan that summarizes all interim cleanup actions completed to date, presents a proposal for any additional interim cleanup actions and presents a proposal for the final cleanup remedy. The remedial action plan shall include a work schedule for implementation. Due to the level of contamination at this site it appears unlikely that natural attenuation will be capable of cleanup to water quality objectives within a reasonable amount of time, however, natural attenuation with verification monitoring should be considered as one of the final cleanup remedies. At least two other cleanup options should be presented in the remedial action plan. An assessment of the site specific feasibility for each option should also be presented.
4. If, for any reason, the discharger is unable to perform any activity or submit any documentation in compliance with the work schedule submitted pursuant to this Order and approved by the Executive Officer, the discharger may request, in writing, an extension of the time as specified. The extension request shall include justification for this delay. An extension may be granted for good cause, in such case this Order will be accordingly revised.

Ordered by _____

Lee A. Michelin
Executive Officer

December 22, 1998