

ARCO Products Company

2000 Alameda de las Pulgas
Mailing Address: Box 5811
San Mateo, California 94402
Telephone 415 571 2400



August 17, 1990

Certified Mail
P338472177

Mr. Javad Rooshan
ARCO Facility #2112
1260 Park Street
Alameda, CA 94501

→ 1260 PARK ST.
ALAMEDA, CA

**RE: HAZARDOUS MATERIALS MANAGEMENT PLAN FOR
COUNTY OF ALAMEDA**

Dear Mr. Rooshan:

Enclosed is a copy of the Hazardous Materials Management Plan which was submitted to the County of Alameda for your facility. Please carefully review this plan, as you are required to abide by the provisions contained therein. Your employees also need to be trained for emergency response. Any significant changes (example: telephone numbers) must be reported to the County of Alameda and ARCO.

You must keep this plan at your station at all times and have it readily accessible. It should be filed in the manuals which your sales representative has distributed and explained to you.

If you have any questions, kindly contact your sales representative or the implementing agency.

Sincerely,

Elaine J. Lavine
Environmental Compliance Administrator

Enclosure

cc: J.M. Mazzotti

7-25-89
Date

BUSINESS RESPONSE PLAN

ARCO RETAIL FACILITY # 2112
1260 PARK STREET
ALAMEDA CA 94501
(Address)

I. Objectives

This plan is designed to minimize hazards to employees, customers, the environment, and the general public from fires, explosions, or any unplanned sudden or non-sudden unauthorized release of hazardous materials from this retail gasoline facility. Provisions include procedures for handling hazardous materials-related emergencies, emergency contact telephone numbers, an inventory of the kinds and amounts of hazardous materials handled by this station, and a synopsis of the employee training program. Additionally, the plan is designed to set procedure for reporting all releases or threatened releases of hazardous materials.

An "Unauthorized Release" is defined as spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, unless permitted or authorized by a regulatory agency. A "Threatened Release" means a condition creating a substantial probability of harm, when the probability and potential extent of harm make it reasonably necessary to take immediate action to prevent, reduce, or mitigate damages to persons, property or the environment.

II. Emergency Coordination Responsibility

General. The primary responsibility for handling hazardous materials-related emergencies will be with the facility's designated On-Scene Emergency Coordinator. Normally, this will be the Lessee Dealer, Franchisee, Station Manager, or the person in charge of the facility. This person, or his/her designated alternate, should act immediately in the event of fires, spills, or leaks involving gasoline or diesel fuel (including vapor leaks), or the imminent threat of spills or leaks involving gasoline or diesel fuel.

The On-Scene Emergency Coordinator has the primary responsibility to notify the proper emergency response personnel and secure the area until the arrival of Police and/or Fire personnel. Additionally, the coordinator is responsible for providing technical assistance to fire and/or police personnel. The Alternate On-Scene Emergency Coordinator will perform these duties in the absence or delay of the Emergency Coordinator.

Employees of the facility will be trained in the proper emergency procedures outlined in this plan (Section III) and, in the absence of or prior to the arrival of the Emergency Coordinator or Alternate, will be expected to implement these procedures to swiftly mitigate emergency situations.

B. Responsibilities of On-Scene Facility's Emergency Coordinator. It is the responsibility of the On-Scene Emergency Coordinator (or Alternate Emergency Coordinator) to respond immediately to all hazardous materials incidents by:

1. Making sure that necessary notifications to emergency response agencies are made and notifying the County Health Department and the Office of Emergency Services of any unauthorized releases.
2. Determining if evacuation of employees or the general public is warranted.
3. Following response procedures, as outlined in Section III.
4. Secure the area until relieved by agencies that have jurisdictional responsibility to mitigate the problem and complete the necessary reports of the incident.
5. Providing assistance to fire, police, or paramedic emergency response personnel, as requested.

C. Responsibilities of all Facility Personnel. It is the responsibility of all facility employees to:

1. Be knowledgeable of the provisions of this Business Response Plan, including:
 - a. Who to contact in the event of an emergency and how to initiate a 911 emergency call.
 - b. Where to find on-site emergency equipment.

- c. How to shut off valves and electricity to the pumps.
 - d. How to sound fire alarm.
2. Conduct their jobs in a safe manner and in accordance with all safety and health rules.

III. Response Procedures to Hazardous Materials Emergencies and Releases

In the event of fires, spills, or leaks of gasoline or diesel fuel (including vapor leaks), or threatened spills or leaks of gasoline or diesel fuel, the following response procedures should be followed.

A. Leaks or Spills

1. STOP FLUID FLOW--close valves and shut off electricity to the pumps.
2. THE ON-SCENE EMERGENCY COORDINATOR or designee should contact 911 (Emergency Center) and the County Health Department and explain the emergency. When necessary, the On-Scene Emergency Coordinator or designee should also request an ambulance or other medical assistance.
3. EVACUATION--If deemed necessary by the On-Scene Emergency Coordinator or his designee, all traffic on site will be halted, and all employees and customers will be moved to a safe, upwind area.
4. CONTAIN THE LIQUID by constructing soil berms and/or by covering the spill with an absorbent material. Prevent liquid from entering storm drains whenever possible.
5. SCENE MANAGEMENT shall be the responsibility of the On-Scene Emergency Coordinator or his designees until the arrival of fire or police personnel. Upon arrival of these personnel, the Emergency Coordinator will cooperate with and offer any assistance that is requested.
6. IMMEDIATELY FOLLOWING AN EMERGENCY--The On-Scene Emergency Coordinator will provide for the storage or removal and disposal of contaminated soil as directed by the local Fire Department or County Health Agency. If neither gives such direction, disposal should be done under direction of a qualified Registered Engineer by a licensed hauler at an approved disposal facility.

B. Fires

1. SOUND FIRE ALARM and call 911 (Emergency Center). Be sure to relate that gasoline is involved in the fire and, if needed, ask for medical assistance.
2. STOP FLUID FLOW--close valves and shut off electricity to the pumps.
3. EVACUATION--stop all traffic on site and move all personnel and customers to a safe, upwind area.
4. SCENE MANAGEMENT is the responsibility of On-Scene Emergency Coordinator or designee until the arrival of public safety response personnel. Upon the arrival of these personnel, the On-Scene Emergency Coordinator will cooperate with and offer assistance, as requested.

IV. Employee Training Program

- A. General. The On-Scene Coordinator or designee will train all new employees of this facility about the following procedures for the safe handling of hazardous materials, procedures for emergency response coordination, and use of emergency response equipment and supplies. Additionally, the On-Scene Coordinator or designee will conduct a refresher training program for all employees on a yearly basis.
- B. Procedures for the Safe Handling of Hazardous Materials.
 1. Employees will be informed of the health and safety hazards involved with the handling of gasoline and diesel fuel.
 2. Employees will be careful not to spill gasoline, diesel fuel, or waste oil onto themselves or the ground.
 3. Employees will not smoke, light matches, cause sparks, or take actions which could ignite flammable liquids or vapors.
- C. Procedures for Emergency Response Coordination.
 1. Employees will be familiar with the emergency response procedures outlined in the Business Response Plan.
 2. Employees will know the location and operation of pump shutoff valves and electrical shutoff switches.

3. Employees will know the location of and how and when to use dry chemical fire extinguishers that are located on the premises. Employees will not attempt to fight large fires under any circumstances.
4. Employees will know the location and proper use of first aid kit(s), fire extinguishers, and absorbent materials that are located on the premises.
5. Employees will know the location of the nearest storm drain(s) and location of absorbent materials to be used to prevent spills reaching the storm drain(s).
6. Employees will be familiar with the kinds of emergency situations which will warrant immediate evacuation of premises. Circumstances include:
 - a. Any gasoline, diesel fuel, or other type of fire.
 - b. Any spill, fuel leak, or vapor leak that has the potential for igniting or exploding.
 - c. Any spill or leak where employees or customers notice gasoline vapors.

V. Employee Training Records

The facility On-Scene Emergency Coordinator will be responsible for documenting and retaining the types and dates of the "training" that each facility employee has completed (initial and refresher) as described under Section IV of this Business Response Plan. These documentation records will be retained at the facility for at least 3 years from the date an employee last worked at the facility. Subject training records will be made available to Governmental Agency or ARCO Products Company (ARCO) personnel upon request. The retention period (3 years) will not apply if the facility is permanently closed.

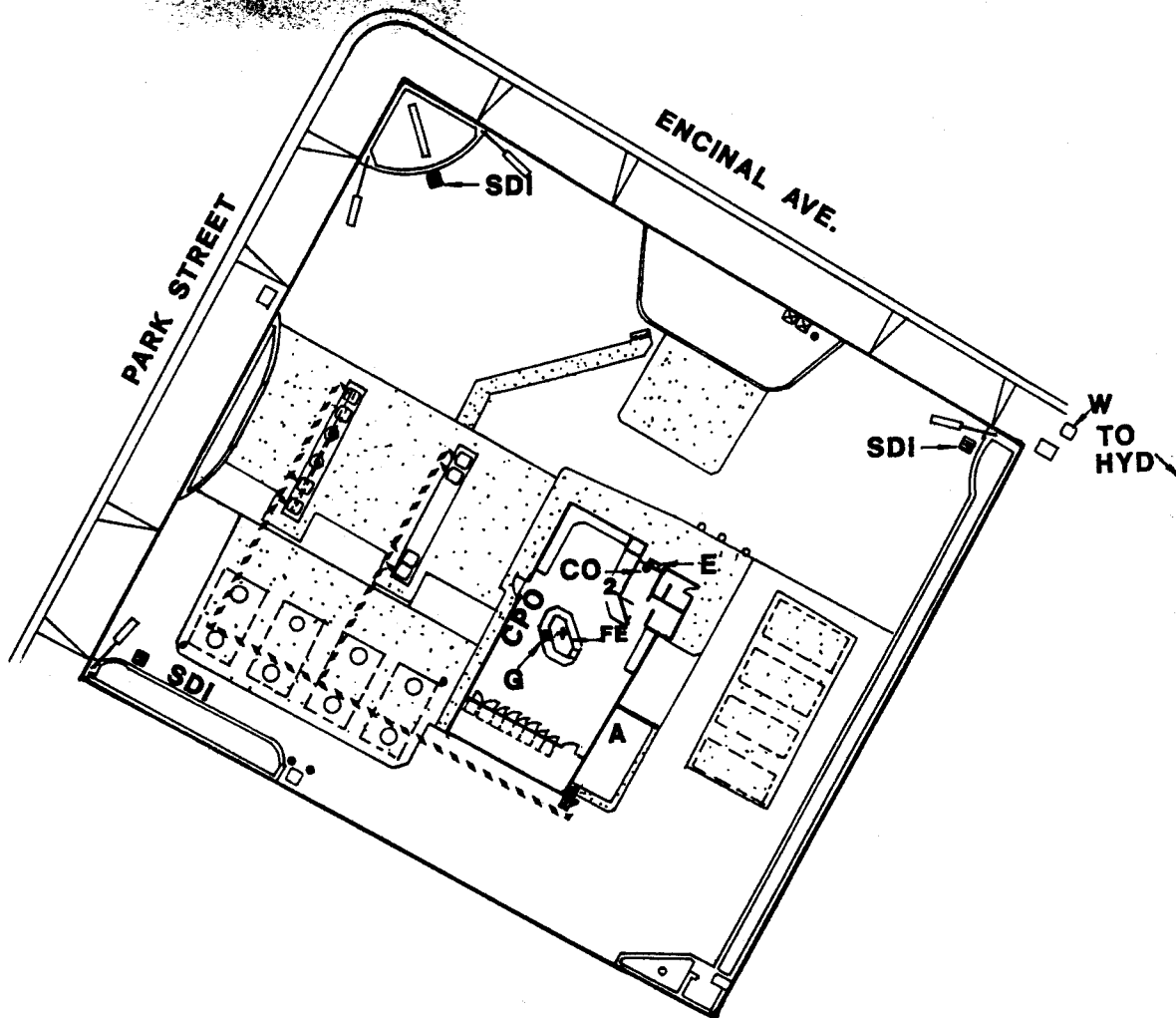
VI. Consent to Report Unauthorized Releases

ARCO Retail Facility # 2112 will, upon discovery, immediately report any release or threatened release of a hazardous material to the ALAMEDA COUNTY DEPT. OF ENVIRONMENTAL HEALTH (415) 271-4320. ARCO Service Station # 2112 will, furthermore, provide all state, city, county, fire, or public health or safety personnel and emergency rescue personnel with access to this facility.

VIII. Other Actions and Follow-up Reporting

In the event you suspect a leak or other possible release and there is no apparent, immediate hazard to the public or the environment, the On Scene Emergency Coordinator will call the ARCO maintenance number (415) 571-2427 ; (800) 451-9442 AFTER HRS for this facility and report all details relevant to the suspected problem.

Where any response action was taken under this Business Plan, the On-Scene Emergency Coordinator or designee is to report, within 24 hours, the incident to the ARCO maintenance organization responsible for this facility; the phone number is (415) 571-2427.



LEGEND

- A - ABSORBENT MATERIAL
- CPO - CONSUMER PACKAGED OIL
- CO₂ - CARBON DIOXIDE GAS CYLINDERS
- E - ELECTRICAL SHUT-OFF
- F - FIRE EXTINGUISHER
- G - EMERGENCY PUMP SHUT-OFF

- MW - MONITORING WELL
- SDI - STORM DRAIN INLET
- W - WATER SHUT-OFF
- HYD - FIRE HYDRANT



**BUSINESS PLAN
SITE ARRANGEMENT**

FACILITY NO. 2112
ADDRESS 1260
PARK STREET
ALAMEDA, CA

**EXHIBIT
A**