

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO281

June 11, 2001

STID 3723

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

Janette M. Thompson
Regional Compliance Specialist
Tosco Marketing Company
2000 Crow Canyon Place, Ste 400
San Ramon, California 94583

Steven Lau
Operator
TOSCO #30163
1716 Webster Street
Alameda, California 94501

Subject: Underground storage tank operating permit, 1716 Webster Street, Alameda CA 94501

Dear Ms. Thompson and Mr. Lau:

This letter is intended to guide you in the proper management of the underground storage tanks (USTs) located at the subject site and to describe actions necessary for compliance with the permit conditions.

The installed system at the above location includes three single wall fiberglass reinforced plastic (FRP) motor vehicle fuel tanks (MVF). The double wall FRP pressurized piping is monitored continuously at the submersible turbine sump (STP). Tank leak detection is performed using an automatic tank gauge which continuously gathers product elevation data in each of the three tanks. The data is analyzed by the monitoring console and reported as a hard copy printout on a monthly basis.

All components of the fuel delivery system are continuously monitored for releases. The electronic monitor, Veeder Root TLS 350, is configured to shut down the appropriate turbine(s) if the monitor is in alarm as a result of a product detection in the STP. The turbine(s) will also shut down if power to the monitor is disconnected. Dispenser containment is equipped with mechanical shear valve shutdown of product lines if liquid is detected in the containment.

The used oil tank is double wall FRP with continuous leak detection in the annular space. The tank is filled directly through a straight drop into the tank and visually monitored to prevent overfilling.

Compliance with the following conditions is a requirement of the permit to operate:

1. Perform leak detection using the sensors and monitoring system as described above. Maintain a copy of the printouts of the monthly tests for all three tanks for three years. At the end of each calendar year prepare and organize a report for the preceding twelve months listing all three MVF tanks, with the passing test report. If a tank fails the monthly test you are required to notify this office within 24 hours.
2. Provide a qualified maintenance contractor for the annual inspection of the entire UST system. System certification by your contractor may take place concurrently.

1716 Webster Street
June 11, 2001
page 2

3. Annually perform operational tests on the electronic monitoring equipment employing factory certified technicians. Maintain records of all maintenance performed on the tank system for no less than five years.
4. Maintain written records of all liquid alarm conditions and their resolution. Maintain certification of financial responsibility with documentation on-site.
5. Provide employee training and document such training necessary to operate a retail fueling station including but not limited to responding to fuel spills and emergencies.
6. Report unauthorized releases to this office within 24 hours of discovery. Provide a written report within five working days.
7. All changes in monitoring equipment must be pre-approved by this office prior to implementation.
8. Report changes in facility operator or tank owners within 30 days of the change.
9. Maintain a copy of the operating permit and operating conditions on-site.

This permit expires on November 3, 2004. If you have any questions regarding the operation of this tank system please contact me at (510) 567-6781.

Sincerely,



Robert Weston
Sr. Hazardous Materials Specialist

enclosures

c: Susan Hugo, ACDEH
Tosco Corporation, P.O. Box 52085, Phoenix, AZ 85072

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#281

Alameda County CC4580
Environmental Health Services
1131 Harbor Bay Pkwy., #250
Alameda CA 94502-6577
(510)567-6700 FAX(510)337-9335

StID 3723

May 10, 1996

Mr. Scott Hooton
BP Oil-Bldg 13, Suite N
295 SW 41st Street
Renton, WA 98055-4931

RE: BP Oil Facility #11104, 1716 Webster St, Alameda, CA

Dear Mr. Hooton:

Upon review of site specific data collected to date, it is not necessary at this time to install a soil and groundwater remediation system at the above referenced site. This decision is based on:

1. adequate source removal at dispenser/pump island;
2. site has been adequately characterized;
3. the dissolved plume is not migrating, and
4. no sensitive receptors are likely to be impacted.

The monitoring/sampling frequency of wells MW-1 and RW-1 may be reduced to a semi-annual basis (to be collected in the spring and fall quarters). The remaining wells should be sampled annually, in the spring quarter. Additional data (bio-indicators) should also be collected to verify that natural bioattenuation is occurring at the site. If oxygen is demonstrated to be a limiting factor, you may consider using an Oxygen Releasing Compound (ORC) in well MW-1.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0281

RAFAT A. SHAHID, Assistant Agency Director

June 26, 1995

Mr. Scott Hooton
BP Oil, Bldg 13, Suite N
295 SW 41st Street
Renton, WA 98055-4931

Alameda County Environmental Health Dept.
Environmental Protection Division ⑥
1131 Harbor Bay Parkway, Room 250
Alameda CA 94502-6577
(510) 567-6700

RE: BP Service Stations in Alameda County

Dear Mr. Hooton:

To date, many of the quarterly monitoring reports are being sent to our former address, and to the wrong case workers. For your information, the following sites are currently handled by me:

- (R0318) 1. BP Station #11126 at 1541 Park Street, Alameda,
- (R0281) 2. BP Station #11104 at 1716 Webster Street, Alameda,
- (R02431, R02888) 3. BP Station #11120 at 6400 Dublin Blvd, Dublin,
- (R0211) 4. BP Station #11116 at 7197 Village Pkwy, Dublin, and
- (R0403) 5. BP Station #11133 at 2220 98th Ave, Oakland.

Our "permanent" address is: 1131 Harbor Bay Parkway, Alameda, CA 94502-6577.

Hopefully, reports will reached me in a more timely manner, now.

eva chu
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

StID 3723

October 25, 1994

Mr. Scott Hooton
BP Oil
295 SW 41st Street
Renton, WA 98055-4931

RE: Workplan Approval for BP #11104, 1716 Webster St, Alameda

Dear Mr. Hooton:

I have completed review of Fugro West's October 1994 Limited Subsurface Investigation Workplan for the above referenced site. The proposal to advance four borings using a cone penetrometer to collect groundwater grab samples along the sewer lines on Webster Street and Buena Vista Avenue is acceptable. Field work should commence within 45 days of the date of this letter, or by **December 19, 1994**. Please notify this office at least 72 hours prior to the start of field activities.

If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

cc: Paul Graff, Fugro, 1050 Melody Ln, #160, Roseville, CA
95678
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, Assistant Agency Director

StID 3723

October 3, 1994

Mr. Scott Hooton
BP Oil
295 SW 41st Street
Renton, WA 98055-4931

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577
(510)567-6700

NOTICE OF VIOLATION

Dear Mr. Hooton:

On July 13 and again on August 18, 1994 the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter requesting a timetable for the implementation, and a proposal detailing the work intended in the vicinity of utility lines to determine if the backfill around the sewer lines is acting as a preferential pathway for the migration of petroleum hydrocarbons away from **1716 Webster Street, Alameda**. As of the date of this letter, however, we have not received the requested workplan or timetable. Therefore, this letter constitutes a **Notice** that you are in violation of specific laws and that the technical report is due.

According to Section 25298 of the California Health and Safety Code, underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Therefore, BP Oil, as the responsible party is in violation of this section of the Code, for which Section 25299 specifies civil penalties of up to \$5,000, for each day of violation, upon conviction.

You are required to submit the technical reports for the site to this office **within 21 days** from the date of this letter. **Failure to respond may result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action.** Modification of required tasks or extensions of stated deadlines must be confirmed in writing by either this agency or the RWQCB.

If you have any questions, I can be reached at (510) 567-6762.

A handwritten signature in cursive script, appearing to read "eva chu".

eva chu
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
Kevin Graves, RWQCB
files (bpwbster.1)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, Assistant Agency Director

August 18, 1994

Mr. Scott Hooton
BP Oil Company
Environmental Resource Mgmt.
295 Southwest 41st St., Ste N
Renton, WA 98055

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

STID 3723

RE: Investigations at BP Oil Site No. 11104, located at 1716
Webster St., Alameda, California

Dear Mr. Hooton,

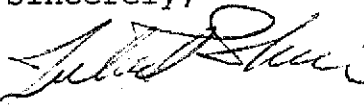
This office has received your letter dated August 2, 1994 regarding the anticipated utility line investigations, and Alisto Engineering's Quarterly Ground Water Report, dated June 7, 1994, for the above site. Per your request, the sampling frequencies for monitoring wells MW-2, MW-3, MW-4, and MW-5 may be switched to a semi-annual basis, due to the fact that ground water samples collected from these wells have identified very low to Non Detect levels of contaminants. However, it was noted that the screened intervals for Wells MW-2 and MW-3 are generally below the water table (screened from 7- to 17-feet below ground surface). Therefore, one of the semi-annual sampling events should be conducted when lower water tables are anticipated.

In your cover letter to the monitoring report, you expressed interest in performing at least one quarterly ground water monitoring event in conjunction with the neighboring Chevron site. The Chevron contact for that site is Mark Miller, whose phone number is (510) 842-8134.

Lastly, per our conversation on August 16, 1994, BP will begin preparing a work plan to address utility line investigations near the site. It is the understanding of this office that BP will submit a timetable outlining the submittal date of the work plan and implementation schedule.

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

Sincerely,


Juliet Shin
Hazardous Materials Specialist

cc: Edgar Howell

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

July 13, 1994

Scott Hooton
BP Oil Company
Environmental Resource Mgmt.
16400 SouthCenter Pkwy., Ste 301
Tukwila, WA 98188

STID 3723

RE: BP Oil Site No. 11104, located at 1716 Webster St., Alameda,
California

Dear Mr. Hooton,

Per our conversation on May 5, 1994 this office requested you to submit a timetable for projected work related to the utility investigations for the above site. In your letter, dated May 5, 1994, you stated that cross-sections of the utility lines, which will be used to develop a scope of work, would be submitted by the end of May 1994. To this date this office has not received a timetable and details of projected work related to the utility lines, nor the cross-sections.

Please submit the above information **within 30 days** of the date of this letter. Lastly, please be reminded that the quarterly ground water report for the May 1994 sampling event is currently due to this office.

The Alameda County Health Department has recently moved to a new office. Our new address is: 1131 Harbor Bay Parkway, Ste 250, Alameda, California 94502. Unfortunately, the County does not yet have a phone system in place. However, we do have some temporary phone numbers that will be in use until about mid-August. My temporary phone number is (510) 337-2874.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Juliet Shin'.

Juliet Shin
Hazardous Materials Specialist

cc: Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

October 14, 1993

Scott Hooton
BP Oil Company
Environmental Resource Mgmt.
16400 SouthCenter Pkwy., Ste 301
Tukwila, Washington 98188

STID 3723

Re: BP Oil Station No. 11104, located at 1716 Webster St.,
Alameda, California.

Dear Mr. Hooton,

It has recently come to our attention that an 8" sewer main runs along the center of Buena Vista Avenue. The top of this sewer main is located at approximately 5 feet to 6 feet below ground surface in the vicinity of the above site, according to the Alameda Public Works Dept. According to our files, the depth to ground water at the site averages about 5 to 6 feet below ground surface, therefore, this office is concerned that this sewer main may be acting as a conduit for some of the contaminants migrating off the site.

You are required to confirm whether this sewer main is or isn't providing a conduit for the migration of the ground water contaminant plume, in order to adequately address the delineation of ground water contamination resulting from the site.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin
Hazardous Materials Specialist

cc: Brian Gwinn
HydroEnvironmental Tech., Inc.
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

July 22, 1993

Scott Hooton
BP Oil Company
Environmental Resource Mgmt.
16400 SouthCenter Pkwy., Ste 301
Tukwila, Washington 98188

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

STID 3723

Re: BP Oil Station No. 11104, located at 1716 Webster St.,
Alameda, California

Dear Mr. Hooton,

Per our conversation on June 7, 1993, it appears that quarterly ground water monitoring has not been conducted out at the site since July 1992. No explanations have been given to date as to why quarterly monitoring has not been regularly conducted at the site. Strangely enough, depth-to-water has been measured on a quarterly basis from the site wells, according to Hydro Environmental's Problem Assessment Report, dated June 10, 1993. You are required to immediately start-up quarterly monitoring at the site. Please contact this office with an explanation as to why quarterly monitoring was ever discontinued at the site.

This office has received and reviewed Hydro Environmental's work plan for aquifer and soil vapor extraction testing, dated July 9, 1993. This work plan is acceptable to this office, and subsequent to obtaining appropriate permits, the proposed work can be implemented as scheduled.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,


Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiatt, RWQCB

Francis Maroni
HydroEnvironmental Tech., Inc.
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
80 Swan Way, Rm 200
Oakland, CA 94621
(510) 271-4530

December 23, 1992

Scott Hooton
BP Oil Company
Environmental Resource Mgmt.
16400 SouthCenter Pkwy., Ste 301
Tukwila, Washington 98188

STID 3723

RE: Work plan for BP Oil Station No. 11104, located at 1716
Webster St., Alameda, California

Dear Mr. Hooton,

This office has received and reviewed Hydro Environmental Technologies' work plan, dated December 15, 1992, for the above site. The work plan is acceptable to this office with the following requirements:

- 1) There must be a minimum waiting period of 24 hours after developing the monitoring wells before you can collect ground water samples;
- 2) Since ground water levels have been observed to be as shallow as 5.9 feet below ground surface, it is advisable that the upper well screen limit be changed to 4 feet below ground surface.

Additionally, please be reminded that you will eventually be required to address the further delineation and remediation of the soil contamination observed at the site in 1990 beneath the area of the former dispensers.

Lastly, please be reminded to copy Richard Hiett, San Francisco Bay Region-Water Quality Control Board, on all correspondence and reports regarding the site.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read "Juliet Shin".


Juliet Shin
Hazardous Materials Specialist

Mr. Scott Hooton
RE: 1716 Webster St.
December 23, 1992
Page 2 of 2

cc: Richard Hiett, RWQCB

Brian Gwinn
HydroEnvironmental Tech., Inc.
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Edgar Howell-File (JS)



ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0281

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

August 21, 1992

Exxon Corporation
c/o Mr. Chester Bennett, Project Manager
Tait and Associates, Inc.
2880 Sunrise Blvd., Suite 206
Rancho Cordova, CA. 95742

Re: British Petroleum Oil Facility, 1716 Webster Street, Alameda

Dear Mr. Bennett;

Please find enclosed a five-year underground storage tank operating permit certificate. This permit is being issued for the facility noted above, contingent upon the facility's compliance with all applicable underground tank monitoring requirements. These conditions are described in the revised Title 23, California Code of Regulations (C.C.R.) which became effective August 9, 1992. In order to maintain a valid permit, any deficiencies noted on the final underground tank inspection report or subsequent inspections, must be corrected. Below is a summary of the monitoring requirements for your facility:

1. Sections 2645 and 2646 - Inventory Reconciliation

- a) Record the daily variation in inventory reconciliation. This is the difference between the measured inventory in the tank and the calculated inventory. The calculated inventory shall be determined by adding the fuel inputs from deliveries and subtracting the day's sales withdraws from the physically measured inventory of the day before.

Meters or gauges used to measure the in tank inventory must be approved by this office. Commercial gauges and measuring devices should meet the standards in Title 4, Chapter 9, of the California Code of Regulations (C.C.R.) and be inspected by the County Department of Weights and Measures.

Handwritten:
Sent
DW
8/24/92

You are advised that after January 1, 1993, using manual stick readings to measure the physical inventory, requires your inventory reconciliation data to be evaluated by a third party certified statistical analyst. This rule applies where the highest anticipated ground water may come to less than 20 feet below the bottom of the tank.

Daily variations shall be summed for a period of one month. If monthly variations exceed 1% per cent of the monthly tank delivery plus 130 gallons, this office must be notified. An investigation as to the cause of excess variations must be conducted and reported to this office.

- b) Submit an annual statement to this office which states that all inventory reconciliation data are within allowable limits or list the times and corresponding variations when allowable limits were exceeded. This statement shall be executed under penalty of perjury.

2. Section 2643 - Non-visual Monitoring

- a) Monitoring of piping shall be conducted at least hourly, which is capable of alerting the operator when 3 gallons have leaked or a leak rate of three gallons per hour at 10 p.s.i. exists; and

Annual piping system integrity testing shall be conducted which is capable of detecting a minimum release of 0.1 gallon per hour at 1.5 (one and a one half times) normal operating pressure.

- b) Annual tank integrity testing shall be conducted which is capable of detecting a release of 0.1 gallon per hour at or above the maximum product level of the tank.

3. Section 2663 - Overfill Prevention

- a) Onsite personnel or the operator's agent must ensure that the volume available in the tank is greater than the volume of product or waste oil to be transferred into the tank before the transfer is made. Also the transfer process must be watched to prevent overfilling and spilling.

4. Section 2632 - New Underground Tank Monitoring

- a) Operate a continuous interstitial space monitoring device for the double-walled waste oil tank. This system must be capable of detecting the presence of the hazardous substance and shall be connected to a visual and audible alarm system as approved by this agency.

- b) Maintain the monitoring equipment in good repair and service in accordance with the manufacturer's instructions. In a written plan, describe the training needed for the operation of both the tank system and monitoring equipment. Maintain the plan on site for review.

5. Section 2712 - Permit Conditions

- a) Retain all monitoring and maintenance records on-site or at a readily available location off-site, if approved by this agency, for a period of at least 3 years. These records must be made available, upon request within 36 hours, to the local agency or the Regional Water Quality Control Board.

The above listed requirements reflect the information currently on file and may not include deficiencies disclosed during routine inspections or changes that will result from tank and piping upgrading required by December 22, 1998. You may utilize other release detection methods for tanks and pipelines as outlined in the revised Title 23, C.C.R.. Please send a letter to this office notifying us of any changes in the monitoring methods.

Consult the revised Title 23, C.C.R. regarding any additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916)323-1262.

Should you have any questions or concerns regarding the contents of this letter, please call me at (510)271-4320.

Sincerely,

Kevin Tinsley
Hazardous Materials Specialist

cc: Pam Evans, Senior Haz. Mat. Specialist, AlCo. E.H.D.
Brian Oliva, Haz. Mat. Specialist, AlCo. E.H.D.



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

September 13, 1991

Mr. David Kim
BP Oil Co.
1716 Webster Street
Alameda, CA 94501

SECOND NOTICE OF VIOLATION

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company Facility #11104, 1716 Webster St.,
Alameda, California 94501**

Dear Mr. Kim:

On July 23, 1991, Maria Mendoza from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

As you are aware, four underground storage tanks (three single-walled product and one double-walled waste oil) exist at the subject facility. During this inspection, Ms. Mendoza noted the following violations of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (HASC):

- 1) Section 2641 and 2644, Title 23, CCR and Section 2529244 of HASC - Per Section 2641, CCR, all owners of existing underground storage tanks are to select an appropriate monitoring alternative. If monitoring alternative #5 is selected, the following activities are required: daily inventory reconciliation, annual tank testing and continuous pipeline leak detection.
 - a) Inventory records are currently not maintained properly for the three product tanks. Monitoring alternative in Section 2641 which specifies inventory reconciliation shall take into account: separate daily underground storage tank quantity measurements for both the stored hazardous substance and any water layer, and daily meter readings for underground storage tank input and withdrawal.

1716 Webster St., Alameda
September 13, 1991
Page 2 of 8

Begin performing daily inventory reconciliation and keep records starting from the date of inspection (July 23, 1991). Compare inputs and metered throughputs to a stick reading and keep track of variations.

Submit copies of monthly inventory reconciliation records for the months of July and August only (by September 27, 1991), then within 10 days of completion for the month of September only (by October 10, 1991).

- b) Quarterly summary reports have not been submitted to our office. The owner or operator, per Section 2644(e), CCR, shall on a quarterly basis, submit a summary report to the local agency, under penalty of perjury, that either: the data is within allowable variations or a listing of the dates and variations that exceed the allowable variations.

Initially submit quarterly summary report for July and August only (by September 27, 1991), then for the month of September only (by October 10, 1991). You may use the quarterly summary report which was provided to you during the inspection.

- 2) Section 2643, CCR and Section 25292 of H&C - This office has not received copies of annual automatic line leak detector test and annual tightness test results for pressurized piping. Per the above sections, the underground storage tank owner is required to have the automatic line leak detector and underground pressurized piping tightness tested annually. Additionally, the last integrity tests on the product tanks is dated December 12, 1989. Please provide our office with the results of annual tank tightness tests, automatic line leak detector tests and pressurized pipeline leak detection tests.
- 3) For the double-walled waste oil tank which was installed in 1987, you are required to submit the following items:
- a) Correctly completed underground storage tank permit application - Form B. An application form was provided to you on the First Notice of Violation sent on July 25, 1991;

1716 Webster St., Alameda
September 13, 1991
Page 3 of 8

- b) Initial tank integrity test results, per Section 2635(7), CCR and Section 25289(b) of the Health and Safety Code;
- c) We have received a copy of your proposed format of a written monitoring plan and spill/leak response plan for BP stations in Alameda County. This format does not adhere to the requirements of Title 23 which were specified in the first Notice of Violations sent to your office. The following is a summary of comments on the documents you have submitted and will apply only to double-walled waste oil tank (not product tanks) at this station:

I. Routine Monitoring Plan - A proposed written routine monitoring was submitted although it contains insufficient information. Please be advised that a site specific written routine monitoring plan shall conform with the requirements of Title 23 and shall include the following information:

- a) The frequency of performing the monitoring method;
- b) The methods and equipment to be used for performing the monitoring;
- c) The location(s) where the monitoring will be performed;
- d) The name(s) and title(s) of the person(s) responsible for performing the monitoring and/or maintaining the equipment;
- e) The reporting format;
- f) The preventive maintenance schedule for the monitoring equipment. The maintenance schedule shall be in accordance with the manufacturer's instructions; and
- g) A description of the training needed for the operation of both the tank system

1715 Webster St., Alameda
September 13, 1991
Page 4 of 8

and the monitoring equipment.

The following are comments on the proposed written routine monitoring plan submitted:

- a) DESCRIPTION - Provide a better way of defining the underground storage tank systems. Include information on sizes, contents and basic specifications.
- b) MONITORING FREQUENCY - Include information on the presence, function and monitoring frequency of Pollulert system.
- c) METHOD OF MONITORING - Please note that a routine monitoring plan should be site specific and method(s) and monitoring equipment(s) may vary by station. Make the appropriate changes.
- d) MONITORING SYSTEM DESCRIPTION -
 1. Underground Tanks and Piping - This is not part of a routine monitoring procedure and should be deleted from the proposed plan.
 2. Provide explanation on what is included in the annual inspection of tanks and piping systems to ensure proper operation. Please note that preventive maintenance schedule including calibration of the monitoring equipment(s) shall be in accordance with the manufacturer's instructions.

In addition to the items mentioned above, include the following information in the proposed routine monitoring plan:

1. Locations of probes in the interstitial space(s) where electronic monitoring device(s) (e.g. Pollulert, etc.) monitor for leaks - whether probes are installed in the interstitial space of tank(s), piping, sumps, island trench, etc.;

2. Description of training needed for operators and BP Maintenance employees or contractors for the routine operation and maintenance of both the tank system and the monitoring equipment(s);
3. Reporting format.

II. Spill/Leak Response Plan - The proposed spill/leak response plan submitted contains insufficient information. The following information must be included in the plan:

- a) BP Oil Maintenance Department's phone number (whether 24-hr. or not) and time frame of responding to the call. Include type of calls Maintenance Department respond to and specify extent of BP Maintenance Department's responsibilities. Also, indicate the number of pump-out truck(s) which respond to calls on a 24-hr. basis and availability of back-up truck should one breaks down or numerous emergency calls are received;
- b) Procedures to be followed by BP Maintenance staff should liquid in the interstitial space or secondary containment system be determined to be product, waste oil or water;
- c) Integrity tests schedule, where applicable;
- d) Manager/owner's responsibility as far as determining leak occurrence or that the monitoring device has malfunctioned. Include procedures on what they have to follow in order to conduct this preliminary investigation;
- e) Reporting and recording procedures and/or responsibilities in the event of unauthorized release, per Article 3, Title 23, CCR;

1715 Webster St., Alameda
September 13, 1991
Page 6 of 8

You may utilize the requirements for spill/leak response plan according to Sections 2632(e)(3) or 2634(c) of the revised Title 23, California Code of Regulations (CCR), whichever is applicable. The following requirements are presented for your reference:

1. Section 2632(e)(2), Title 23, CCR - The spill/leak response plan should demonstrate that any unauthorized release will be removed from the secondary containment system within the time consistent with the ability of the secondary containment system to contain the hazardous substance, but not more than 30 calendar days. The response plan shall include, but is not limited to, the following:
 - a) A description of the proposed methods and equipment(s) to be used for removing and properly disposing of any hazardous substances, including the location and availability of the required equipment(s) if not permanently on-site, and an equipment maintenance schedule for the equipment located on-site;
 - b) The name(s) and title(s) of the person(s) responsible for authorizing any work necessary under the response plan.

The requirements mentioned above can be used for new underground storage tanks, both fuel and non-fuel type (including waste oil), constructed according to standards set forth in Section 2631, Title 23, CCR.

2. Section 2634(c), Title 23, CCR - The following requirements can only be implemented if the leak interception and detection system DOES NOT meet the volumetric requirements of subsection 2631(d), Title 23, CCR. The response plan shall consider the following:

1716 Webster St., Alameda
September 13, 1991
Page 7 of 8

- a) The volume of the leak interception and detection system in relation to the volume of the primary container;
- b) The amount of time the leak interception and detection system must provide containment in relation to the period of time between detection of an unauthorized release and cleanup of the leaked material;
- c) The depth from the bottom of the leak interception and detection system to the highest anticipated level of groundwater;
- d) The nature of the unsaturated soils under the leak interception and detection system and their ability to absorb contaminants or to allow movement of contaminants; and
- e) The methods and scheduling for removing all of the hazardous substances which may have been discharged from the primary container and are located in the unsaturated soils between the primary container and ground water, including the leak interception and detection system sump.

The requirements mentioned above can be utilized for new motor vehicle fuel underground storage tanks only, if they meet the alternate construction requirements, pursuant to Section 2633, Title 23, CCR.

Please be advised that the requirements discussed in Sections 2632(e)(2) and 2634(c) are adopted from the revised Title 23, CCR and were effective August 9, 1991. You may obtain a copy of the regulations by contacting State Water Resources Control Board at (916) 324-1262.

1716 Webster St., Alameda
September 13, 1991
Page 8 of 8

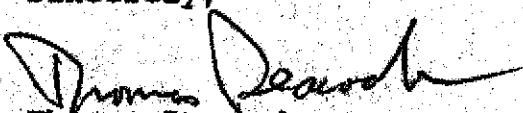
Please note that copies of the documents requested above and other related tank/pipe integrity records shall be maintained on-site for at least three (3) years.

Submit all of the required materials to this office within 10 working days, i.e. no later than September 27, 1991 and other documents within the time frame specified. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

Failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code, of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5000) for each underground storage tank for each day of violation.

Should you have any questions or concerns regarding the contents of this letter, please feel free to contact either Brian Clive or myself, at (510) 271-4320.

Sincerely,



Thomas Peacock
Sr. Hazardous Materials Spec.

NAM:mam

cc: Pete DeSantis, Environmental Coordinator, BP Oil Company
Dale Swain, Alton Geoscience
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0281

July 25, 1991

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

Mr. David Kim
BP Oil Co.
1716 Webster Street
Alameda, CA 94501

NOTICE OF VIOLATION

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company Facility #11104, 1716 Webster St.,
Alameda, California 94501**

Dear Mr. Kim:

On July 23, 1991, Maria Mendoza from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

As you are aware, four underground storage tanks (three single-walled product and one double-walled waste oil) exist at the subject facility. During this inspection, Ms. Mendoza noted the following violations of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (H&SC):

- 1) Section 2641 and 2644, Title 23, CCR and Section 25292(4) of H&SC - Per Section 2641, CCR, all owners of existing underground storage tanks are to select an appropriate monitoring alternative. If monitoring alternative #5 is selected, the following activities are required: daily inventory reconciliation, annual tank testing and continuous pipeline leak detection.
 - a) Inventory records are currently not maintained properly for the three product tanks. Monitoring alternative in Section 2641 which specifies inventory reconciliation shall take into account: separate daily underground storage tank quantity measurements for both the stored hazardous substance and any water layer, and daily meter readings for underground storage tank input and withdrawal.

Begin performing daily inventory reconciliation and keep records starting from the date of inspection (July 23, 1991). Compare inputs and metered throughputs to a stick reading and keep track of variations.

1716 Webster, Alameda
July 25, 1991
Page 2 of 4

Submit copies of monthly inventory reconciliation records within 10 days of completion until further notice is given by our office.

- b) Quarterly summary reports have not been submitted to our office. The owner or operator, per Section 2644(e), CCR, shall on a quarterly basis, submit a summary report to the local agency, under penalty of perjury, that either: the data is within allowable variations or a listing of the dates and variations that exceed the allowable variations.

Initially submit quarterly summary report for the first month of doing daily inventory reconciliation until further notice is given by our office. Please find enclosed a sample of a quarterly summary report for your reference.

- 2) Section 2643, CCR and Section 25292 of H&SC - This office has not received copies of annual automatic line leak detector test and annual tightness test results for pressurized piping. Per the above sections, the underground storage tank owner is required to have the automatic line leak detector and underground pressurized piping tightness tested annually. Additionally, the last integrity tests on the product tanks is dated December 12, 1989. Please provide our office with the results of annual tank tightness tests, automatic line leak detection tests and pipeline leak detection tests.
- 3) For the double-walled waste oil tank which was installed in 1987, you are required to submit the following items:
- a) Correctly completed underground storage tank permit application - Form B. An application form is enclosed for your use;
- b) Initial tank and pipeline precision test results, per Section 2635(7), CCR and Section 25289(b) of the Health and Safety Code;
- c) A written routine monitoring procedure/plan per Section 2632(d)(1) or 2634(d)(2), Title 23, CCR, which includes, where applicable: the frequency of performing the monitoring method, the methods and equipment to be used for monitoring, where monitoring

1716 Webster, Alameda
July 25, 1991
Page 3 of 4

will be performed, the location(s) from which the monitoring will be performed, the name(s) or title(s) of the person(s) responsible for performing the monitoring and/or maintaining the equipment, and the reporting format;

Please be advised that the written monitoring plan should include information about calibration and/or maintenance of continuous electronic leak detection system and automatic line leak detector.

- d) A written spill/leak response plan per Section 2632(d) (2), Title 23, CCR. This plan should demonstrate that in the event of an unauthorized release, product would be removed from the secondary container within the shortest possible time. It should include at least the following:
- 1) A description of the proposed methods and equipment to be used for removing the waste oil, including the location and availability of the required equipment, if not permanently on-site, and an equipment maintenance schedule for the equipment located on-site.
 - 2) The name(s) or title(s) of the person(s) responsible for authorizing the work to be performed.

Please note that copies of the documents requested above and other related tank/pipe integrity records shall be maintained on-site for at least three (3) years.

Submit all of the required materials to this office within 10 working days, i.e. no later than August 8, 1991. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

Failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code, of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5000) for each underground storage tank for each day of violation.

1716 Webster, Alameda
July 25, 1991
Page 4 of 4

Should you have any questions or concerns regarding the contents of this letter, please feel free to contact either Maria Mendoza or myself, at (415) 271-4320.

Sincerely,

Lyntha Chapman

for Thomas Peacock, Sr. Hazmat Specialist
Hazardous Materials Division

MAM:mam

cc: Lou Parisi, BP Oil Company
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Files

enclosures

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0281

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

Certified Mailer #:P 062 128 204

June 27, 1990

Mr. Lou Parisi
BP Oil Company
2868 Prospect Drive, Suite 360
Rancho Cordova, California 95670

Re: **Five-Year Permits for Operation of Four Underground Storage Tanks at BP Oil Company Facility #11104, 1716 Webster Street, Alameda, California 94501**

Dear Mr. Parisi:


We have recently reviewed and accepted the plans for the replacement of the dispensers - and of associated piping as is needed - for three underground gasoline storage tanks (sized 12,000 gallons, 10,000 gallons, and 6,000 gallons) at the above facility. To obtain five-year operating permits for these tanks and for the 1,000 gallon waste oil tank also on site, you must submit the following information to our office:

- 1) Tank and piping as-builts for the above described work. As-builts must be submitted within 30 days project completion;
- 2) Correctly completed, up-dated underground storage tank permit applications. Copies of these applications are enclosed for your convenience. One Part A application must be completed per facility. One Part B application must be completed per tank;
- 3) For the three gasoline tanks, documentation of the monitoring alternative selected for each tank per the California Code of Regulations (CCR), Title 23, Section 2641 (a). If Monitoring Alternative 5 has been selected, inventory reconciliation performance and the allowable error must be in accordance with Sections 2641(c)(5) and 2644 of the CCR Title 23. Tanks monitored by Alternative 5 must be tested annually at a minimum; and
- 4) For the waste oil tank, which was installed in 1987, submit the following two items:
 - a) A written routine tank monitoring procedure per Title 23, Section 2632 (d)(1); and
 - b) A written response plan per Title 23, Section 2632 (d)(2).

Page 2 of 2
Mr. Lou Parisi
1716 Webster Street
June 27, 1990

Please note that underground storage tanks may not be used without a permit. Should you have any questions, please feel free to contact me at (415) 271-4320.

Sincerely,



Katherine Chesick,
Senior Hazardous Materials Specialist

enclosures

cc: W. J. Hollis, Environmental Coordinator, BP Oil Company
A. G. Mulligan, Facility Operator
Drew Bardett, Majors Engineering
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Alameda County Environmental Health
Department
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