SENT
5-13-05

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

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

May 11, 2005

Kyle Christie
Atlantic Richfield Company
6 Centerpointe Drive, LPR6-161
La Palma, CA 90623-1066

Liz Sewell
ConocoPhillips
76 Broadway
Sacramento, CA 95818

Subject: Fuel Leak Case No. RO0000403, BP #11133, Former Service Station at 2220 98th Avenue, Oakland, California – Workplan Approval

Dear Mr. Christie, and Ms. Sewell:

Alameda County Environmental Health (ACEH) has reviewed your April 28, 2005, *Soil and Water Investigation Workplan* prepared by URS Corporation, Inc., and the case file for the above-referenced site. We concur with your workplan provided the following conditions are met:

1. If deemed necessary by your geologist or engineer to fully define the vertical and lateral extent of contamination, additional soil or groundwater samples will be collected as part of the current investigation efforts. ACEH will be informed via telephone or email of any additions to the sampling and analysis plan. Any additional work will follow the workplan-specified procedures. Dynamic investigations are consistent with USEPA protocol for expedited site assessments, which are scientifically valid and offer a cost-effective approach to fully define a plume and to help progress a case toward closure.
2. 72-hr advance written notification (email preferred) will be provided to ACEH prior to field sampling activities.

Please implement the proposed investigation and submit technical reports following the schedule below. In addition, we request that you address the following technical comments in your report.

TECHNICAL COMMENTS

1. Contaminants of Concern

URS proposes sample analysis for TPHg, BTEX, MTBE, TBA, ETBE, TAME, DIPE, 1,2-DCA, EDB and ethanol. Based on our review of the recent groundwater data, contaminants of concern (COCs) at the site include: TPHg, BTEX, MTBE, TBA, and TAME only (TBA is a COC due to its potential occurrence as a MTBE degradation product). Ongoing analysis for DIPE, ETBE, EDB and 1,2-DCA may not be necessary. Prior to conducting the proposed investigation, we request that you review all historical analytical data for the site in order to 1) confirm compliance with the minimum verification analyses listed in the Tri-Regional Guidelines, and 2) confirm the COCs at the site. Please identify appropriate COCs for the site in the report requested below.

2. Feasibility Study Workplan

Please specify the procedures for nitrate and sulfate injection in your feasibility study workplan. The workplan needs to propose groundwater monitoring procedures and other sampling activities, including specification of analytes, to ensure that pre-injection and post-injection geochemical conditions are well documented and understood. Please submit your Feasibility Study Workplan following the schedule specified below.

3. Corrective Action Plan

In accordance with 23 CCR 2725, an assessment of the impacts, a feasibility study, and applicable cleanup levels need to be included in your CAP. We request that 1) your assessment summarize all subsurface investigation performed at the site, 2) your feasibility study evaluate at least three potentially feasible remedial technologies, and 3) your CAP propose cleanup goals and cleanup levels for the site. Your cleanup goals need to be consistent with water quality objectives for the basin. Soil and groundwater cleanup levels for the site need to be protective of human health and the environment. Prior to discontinuation of active remediation, the appropriate cleanup levels will need to be achieved. Please submit your CAP following the schedule specified below.

REPORT REQUEST

Please submit reports according to the following schedule:

Feasibility Study Workplan	July 11, 2005
Soil and Water Investigation Report	August 11, 2005
Corrective Action Plan	90 days after FS approval

ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Lynelle Onishi, URS Corporation, 1333 Broadway, Ste. 800, Oakland, CA 94612-1924
Donna Drogos, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

SCAT 01-26-05

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

January 25, 2005

Kyle Christie
Atlantic Richfield Company
6 Centerpointe Drive
LPR6-161
La Palma, CA 90623-1066

Subject: Fuel Leak Case No. RO0000403, BP #11133, Former Service Station at 2220 98th Avenue, Oakland, California – Workplan Approval

Dear Mr. Christie:

Alameda County Environmental Health (ACEH) has reviewed your October 29, 2004, *Additional Investigation Workplan* prepared by URS Corporation, Inc., for the above-referenced site. URS proposes a comprehensive well sampling event, bioparameter (including microbial) evaluation, determination of additional sampling locations north and east-southeast of the site, and corrective action planning. We concur with your workplan. Please implement the proposed comprehensive well sampling event and submit technical reports following the schedule below. In addition, we request that you address the following technical comments in your report.

TECHNICAL COMMENTS

1. Offsite Investigation

Up to 1.38 ft of separate phase hydrocarbons (SPH) have been detected in onsite well RW-1, and the groundwater concentrations detected in boring B-6 exceed 10% of the pure component solubility of benzene. Accordingly, your proposed scope of work needs to include tasks that will evaluate the potential presence of LNAPL beneath the downgradient residence(s). URS proposes depth-discrete groundwater sampling between borings A-4 and A-8. Please identify specifically how your proposed sampling will address our concern in the workplan requested below.

2. Preferential Pathway Sampling

URS states that the depth to the Springfield Street storm drain invert is approximately 6.5 ft. Higher permeability backfill sands and/or gravels are frequently used in utility construction to underlie and protect subsurface utilities. Considering the potential cumulative thickness of the storm drain line (~6 inches) and the storm drain trench backfill (~1 to 2 ft), the data presented to date suggests that higher permeability materials beneath the Springfield Street storm drain could intersect the groundwater table. Please propose tasks to collect soil and groundwater samples within the Springfield Street storm drain trench backfill in the workplan requested below.

3. Feasibility Study

URS proposes tasks to collect and evaluate data relative to intrinsic and enhanced biodegradation at the site. Previously, a groundwater extraction system was installed at the site. It may be cost-effective to retrofit this system for future use. Accordingly, it may be necessary to

include operation of an extraction system (soil vapor or dual-phase) in a future feasibility study for the site. Please evaluate the condition of the existing system in the workplan requested below.

REPORT REQUEST

Please submit your *Soil and Water Investigation Workplan,* which addresses the comments above by **April 25, 2005**. ACEH makes this request pursuant to California Health & Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2778 outline the responsibilities of a responsible party for an unauthorized release from an UST system, and require your compliance with this request.

Professional Certification and Conclusions/Recommendations

The California Business and Professions Code (Sections 6735 and 7835.1) requires that workplans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

Perjury Statement

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested we will consider referring your case to the County District Attorney or other appropriate agency, for enforcement. California Health and Safety Code, Section 25299.76 authorizes ACEH enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

Please contact me at (510) 567-6719 or at robert.schultz@acgov.org with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Leonard Niles, URS Corporation, 500 12th St., Ste. 200, Oakland, CA 94607-4014
Liz Sewell, ConocoPhillips, Risk Management & Remediation, 76 Broadway, Sacramento, CA 95818
First Interstate Bank of California, c/o Property Tax Dept. DC-17, P.O. Box 52085, Phoenix, AZ 85072
Donna Drogos, ACEH
Robert W. Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

SENT 9-1-04

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

August 30, 2004

Kyle Christie
Atlantic Richfield Company
6 Centerpointe Drive
LPR6-161
La Palma, CA 90623-1066

Subject: Fuel Leak Case No. RO0000403, BP No. 11133, Former Automobile Service Station at 2220 98th Avenue, Oakland, California

Dear Mr. Christie:

Alameda County Environmental Health (ACEH) has reviewed your recent groundwater monitoring report and the case file for the above-referenced site. Previous correspondence from BP suggested that the site would be redeveloped as a carwash. More recently, ACEH has received requests concerning residential redevelopment of the site. We request that you submit a site conceptual model and workplan for additional characterization by the due date specified below.

TECHNICAL REQUESTS

1. Site Conceptual Model

ACEH requests a Site Conceptual Model (SCM) that illustrates the relationship between contaminants, retention/transport media, and receptors. The SCM shall incorporate all aspects of the contaminant release investigation, including site geology, hydrogeology, release and cleanup history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is developed using readily available (existing) data and is used to identify data gaps that are subsequently filled as the investigation proceeds. Investigations continue until the SCM does not significantly change upon collection of additional information, and the SCM is said to be "validated." By clarifying major site issues, the validated SCM forms the foundation for developing the most cost-effective corrective action plan, and will help progress the case towards closure.

Technical guidance for developing SCMs is presented in ASTM 1689-95(2003)e1 *Standard Guide for Developing Conceptual Site Models for Contaminated Sties;* American Petroleum Institute Publication No. 4699 *Strategies for Characterizing Subsurface Releases of Gasoline Containing MTBE*, dated February 2000; EPA 510-B-97-001 *Expedited Site Assessment Tools for Underground Storage Tank Sites: A Guide for Regulators*, dated March 1997; and State Water Resources Control Board's *Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C,* dated March 27, 2000.

At a minimum, the SCM for this project is to include the following:

A. A concise narrative discussion of the regional geologic and hydrogeologic setting. Include a list of technical references you reviewed.

B. A concise discussion of the on-site and off-site geology, hydrogeology, release source and history, secondary source areas, remediation status, risk assessment, plume migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient receptors. The SCM shall include an analysis of the hydraulic flow system at and downgradient from the site, including potential vertical hydraulic gradients.

C. Local and regional maps showing location of sources, extent of soil and groundwater contamination for appropriate depth intervals (i.e., an interpretive drawings and isoconcentration maps—not a plot of laboratory results), rose diagram of recent and historical groundwater gradients, and locations of receptors. "Receptors" include, but are not limited to, all supply wells and surface water bodies within 2,000 feet of the source area, and all potentially impacted schools, hospitals, daycare facilities, residences, and other areas of heightened concern for vapor impact.

D. Geologic cross-sections (parallel and perpendicular to the contaminant plume axis) which include subsurface geologic features, depth to groundwater, man-made conduits, soil boring and sampling locations, monitoring well construction, and an interpretive drawing of the vertical extent of soil and groundwater contamination (i.e., an interpretive drawing—not a plot of laboratory results).

E. Exposure evaluation flowchart (similar to Figure 2 in ASTM's Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites).

F. Plots of chemical concentrations vs. time and vs. distance from the source. Plots should be shown for each monitoring well which has had detectable levels of contaminants.

G. Summary tables of chemical concentrations in each historically sampled media (including soil, groundwater and soil vapor).

H. Boring and well logs (including construction/screening), and a summary table indicating construction specifications for each monitoring and extraction well.

I. Identification and listing of specific data gaps that require further investigation during subsequent phases of work.

J. Proposed activities to investigate and fill data gaps identified above.

2. Conduit Study

The objectives of the conduit study are to 1) locate potential migration pathways and 2) evaluate the potential for contaminant migration via the identified pathways. We request that you perform a conduit study that details the potential migration pathways and potential conduits (utilities, storm drains, etc.) that may be present in the vicinity of the site. Provide a map showing the location and depth of all utility lines and trenches including sewers and storm drains within and near the plume area. The conduit study shall include a detailed survey of all wells (monitoring and production wells: active, inactive, standby, destroyed (sealed with concrete), abandoned (improperly destroyed); and dewatering, drainage, and cathodic protection wells) within a 2,000 ft radius of the site. The results of your conduit study shall contain all information required by 23 CCR, Section 2654(b). Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. We recommend that you obtain well information from the State of California Department of Water Resources, at a minimum. Please include an analysis and interpretation of your findings, and report your results in the site conceptual model requested above.

3. Site Characterization

In October 2001, Cambria Environmental advanced soil borings B-1 through B-6 and detected up to 30,600 ug/L benzene and 1,500 ug/L MTBE in groundwater near the property boundary between the site and adjacent residences. At that time, local groundwater was thought to flow to the northwest or the north[1,2]. Since mid-2003, reports prepared by URS Corporation have indicated that groundwater flows from the site toward the southwest[3,4]. Based on the current understanding of flow direction, no subsurface investigation has been performed downgradient of borings B-1 through B-6. Offsite well AW-8 is located approximately 140 ft east-northeast (crossgradient or upgradient) of boring B-6. Offsite well AW-4 is located approximately 40 ft south (upgradient and crossgradient) of boring B-6. We request that you prepare a workplan for additional downgradient investigation.

Up to 1.38 ft of separate phase hydrocarbons (SPH) have been detected in onsite well RW-1. In addition, the groundwater concentrations detected in boring B-6 exceed 10% of the pure component solubility of benzene. Accordingly, your proposed scope of work should include tasks that will evaluate the potential presence of LNAPL beneath the downgradient residences.

The workplan must also propose tasks which investigate potential contaminant migration via preferential pathways identified in the conduit study requested above (Comment #2). Depending on the depth of subsurface utilities relative to historical groundwater depths, sampling within utility backfill and within conduits such as storm drains may be necessary. If necessary or prudent based on the findings of your conduit study, your workplan should propose tasks which will evaluate the potential for the storm drains beneath Springfield Street to influence dissolved contaminant migration from the site.

REPORT REQUEST

Please submit an *Additional Investigation Workplan* containing the SCM and conduit study requested above by **September 30, 2004**. CCR, Title 23, Chapter 16 requires your compliance with this request. If it appears as though significant delays are occurring or reports are not submitted as requested we will consider referring your case to the County District Attorney or other appropriate agency, for enforcement. Under California Health and Safety Code, Section 25299.76, you may be subject to civil penalties of up to $10,000 per day for each day of violation.

[1] Blaine Tech Services, 3rd Quarter 2001 Monitoring at 11133, September 25, 2001.
[2] Cambria Environmental Technology, First Quarter 2002 Groundwater Monitoring Report, April 30, 2002.
[3] URS Corporation, *Second 2003 Semi-Annual Groundwater Monitoring Report*, August 15, 2003.
[4] URS Corporation, *First 2004 Semi-Annual Groundwater Monitoring Report*, March 4, 2004.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,

Robert W. Schultz, R.G.
Hazardous Materials Specialist

cc: Scott Robinson, URS Corporation, 500 12th St., Ste. 200, Oakland, CA 94607-4014
Liz Sewell, ConocoPhillips, Risk Management & Remediation, 76 Broadway, Sacramento, CA 95818
First Interstate Bank of California, c/o Property Tax Dept. DC-17, P.O. Box 52085, Phoenix, AZ 85072
Donna Drogos, ACEH
Robert W. Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

9-4-01

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

RO0000403

August 31, 2001

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

RE: Work Plan Approval for Former BP 11133 at 2220 98th Ave, Oakland, CA

Dear Mr. Hooton:

I have completed review of Cambria's August 2001 *Supplemental Investigation Work Plan* prepared for the above referenced site. The proposal to advance six onsite soil borings to collect soil, soil vapor, and groundwater samples is acceptable. Soil vapor samples should be collected with Summa canisters.

Field activities should commence within 60 day of the date of this letter. Please provide 72 hours advance notice of field work. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

c: Khaled Rahman, Cambria, 1144 65th St., Suite B, Oakland, CA 94608

bp11133-5

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

05-10-01

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

RO0000403

May 9, 2001

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

RE: Former BP Facility No. 11133, at 2220 98th Ave, Oakland, CA

Dear Mr. Hooton:

I have completed review of Newfields' May 2001 *Groundwater Comment Resolution for the Risk-Based Corrective Action Evaluation* prepared for the above referenced site. Newfields proposed to use TPH and benzene concentration contours to demonstrate steady-state conditions at the site. And a revised RBCA evaluation will be prepared using new data from grab groundwater samples planned at the property line adjacent to off-site residents.

Newfields' proposals are acceptable. Please submit a workplan for the advancement of hydro-punches at the property line. When the new data and revised RBCA becomes available, I will review if a no further action finding with no future monitoring is warranted for the site. In the meantime, please continue with semi-annual sampling of wells MW-1, MW-3, AW-1, AW-4, AW-5 and RW-1, and annual sampling of AW-2 and AW-6. Groundwater should have been sampled in April 2001.

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

eva chu
Hazardous Materials Specialist

email: Mark Jones (mjones@newfields.com)

bp11133-4

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

01-03-01

R0403

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

StID 3877

January 2, 2001

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

RE: Groundwater Sampling Frequency at Former BP Station No. 11133, at 2220 98th Avenue, Oakland, CA

Dear Mr. Hooton:

I have completed review of the *Fourth Quarter 2000 Groundwater Monitoring* report prepared for the above referenced site by Blaine Tech Services, Inc. Only wells RW-1 and MW-1 were sampled in October 2000.

This letter is to inform you that the following sampling frequency should be implemented for the site:

- Semi-annual sampling of wells MW-1, MW-3, AW-1, AW-4, AW-5, and RW-1; and,
- Annual sampling of wells AW-2 and AW-6.

Please adhere to the above sampling frequency until further notice. For the next groundwater sampling event, groundwater should also be analyzed for all ether oxygenates using EPA Method 8260. If you have any questions, I can be reached at (510) 567-6762.

eva chu
Hazardous Materials Specialist

bp11133-3

Sent 6/7/2000
well cc's

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0403

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

StID 3877

June 7, 2000

Mr. Clifford Hoskins
Emerging Star Enterprises, Inc.
655 So. Fair Oaks Ave., B215
Sunnyvale, CA 94086

RE: 2220 98th Avenue, Oakland, CA

Dear Mr. Hoskins:

I am in receipt of a risk assessment (*the Risk-Based Corrective Action (RBCA) Evaluation for BP Oil Facility 11133)* prepared for BP Oil to address residual petroleum hydrocarbon contamination at the above referenced site. That report is currently under review by this agency and by the SF-RWQCB.

I am also in receipt of a site plan for the proposed car wash. At this time, this agency has no objection to the development of this site into a full service car wash. Bear in mind that BP Oil will need to continue to sample existing groundwater monitoring wells and possibly install replacement wells at the site upon completion of the car wash.

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

eva chu
Hazardous Materials Specialist

c: Scott Hooton, BP Oil, 295 SW 41st Street, Bldg. 12, STE N, Renton, WA 98055-4931

bp11133-1

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RO# 403

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

May 14, 1996

Mr. Larry Silva
Environmental Officer
Tosco Marketing Company
601 Union Street, suite #2500
Seattle, Washington 98101

Site # 3848

Re: FIVE YEAR UNDERGROUND STORAGE TANK PERMIT AT, BRITISH PETROLEUM STATION # 11133, 2220 98TH STREET, OAKLAND, CALIFORNIA, 94603

Dear Mr. Silva:

Enclosed is your five year permit to operate three underground storage tanks, at the above referenced facility. Two of the tanks are 10,000 gallon capacity and the third is 12,000 gallon which contains regular gasoline. Each of these tanks are double-walled with fiberglass or plastic coating. Their associated piping is also double-walled.

To operate under a valid permit, you are required to comply with the conditions in Title 23 of the California Code of Regulations (CCR). Based on these requirements, each tank and its piping has interstitial monitoring by an electronic alarm system. In addition, the piping has pressure loss flow restrictors. Liquid leak detection sensors monitor the tanks annular spaces and the piping access wells. The probes are wired to a Pollulert FD 103 alarm unit located inside the facility. When a sensor detects liquid the audible alarm will sound. The fuel dispenser is then shut-off until an investigation as to the cause of the alarm is determined and the system is found to be tight.

You may consult the revised Title 23, CCR for additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916) 657-0917.

Please, do not hesitate to contact me with any questions at (510) 567-6731, Tuesday through Friday.

Sincerely,

Kevin Tinsley
Hazardous Materials Specialist

c, Larry Seto, Senior Hazardous Materials Specialist, Al.Co.
E.P.S.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RO# 403

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6777

March 15, 1996

Mr. Larry Silva
Tosco Northwest Prop. II, Inc.
601 Union Street, Suite 2500
Seattle, WA 98101

RE: BP Oil Facility #11133, 2220-98th Avenue,
Oakland, CA 94603

Dear Mr. Silva:

An underground tank inspection was performed at the above facility on March 14, 1996. During my inspection, Mr. Sidhu, the Dealer did not know how to perform a self test for the underground tank monitoring system, and could not locate the operating manual. The operations manual for the monitoring system should be at the site at all times. Before an operating permit can be issued to the underground tanks at the above site, the following information must be submitted to my office for review and approval:

1. Completed Underground Storage Tank Permit, Form A
2. Spill Response Plan
3. Underground tank monitoring plan

If you have any questions, please contact me at (510) 567-6774.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

cc: Tarlochan Sidhu, BP Oil Dealer
Don Atkinson-Adams, Environmental Protection
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RO#403

RAFAT A. SHAHID, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

StID 3877

March 1, 1996

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

RE: Delineation of Contaminant Plume at 2220 98th Ave, Oakland CA 94603

Dear Mr. Hooton:

I have completed review of Alisto's February 1996 Groundwater Monitoring and Sampling Report for the above referenced site. After 17 sampling events groundwater monitoring well AW-4 continues to exhibit elevated levels of benzene. At this time additional investigations are required to delineate the extent of the contaminant plume. A workplan for this phase of the investigation is due within 45 days of the date of this letter, or **by April 19, 1996.**

In addition, a risk assessment workplan to determine if groundwater vapor intrusion from groundwater to buildings poses a risk to the inhabitants of the adjacent residential building is required. This workplan proposal is also due within 45 days of the date of this letter.

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

eva chu
Hazardous Materials Specialist

cc: files

DK

bpoak5

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

R0403

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

June 26, 1995

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

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

R0403

RAFAT A. SHAHID, Assistant Agency Director

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

StID 3877

December 28, 1994

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

RE: Additional Investigations at BP Service Station 11133, 2220 98th Ave, Oakland 946003

Dear Mr. Hooton:

I have completed review of Alisto Engineering's November 1994 Groundwater Monitoring and Sampling Report for the above referenced site. Well RW-1 continues to show the presence of free product. Downgradient well AW-4 continues to show elevated levels of hydrocarbons. The extent of the contaminant plume has not been delineated downgradient of AW-4. At this time, an additional well(s) is required southeast of AW-4. Please submit a workplan for the required investigation to this office by **February 20, 1995.**

Also, provide an update of the status of the remediation system, whether a pilot test has been completed, the estimated time when system will be in full operation, etc.

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

eva chu
Hazardous Materials Specialist

cc: files

bpoak4

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0403

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

StID 3877

March 14, 1994

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

SECOND NOTICE OF VIOLATION

Dear Mr. Hooton:

On March 4, 1993, the Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter approving RESNA's January 1993 Remedial Action Plan (RAP) for the removal of residual hydrocarbons from soil, removal of free product and dissolved hydrocarbons from ground water underlying the site and adjacent properties, and prevention of further migration of hydrocarbons at **2220 98th Ave., Oakland.** The RAP was to be implemented by April 20, 1993. As of the date of this letter, however, we have not received any communication from you that field work has begun. Therefore, this letter constitutes a **Second Notice** that you are in violation of specific laws.

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, you, as the responsible party are 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. Also, failure to furnish technical reports regarding documented or potential groundwater contamination violates Section 13267(b) of the California Water Code. The Regional Water Quality Control Board (RWQCB) can impose civil penalties of up to $1,000 per day that such a violation continues.

Also, we are not in receipt of reports documenting any interim action taken to abate the potential effects of an unauthorized release of petroleum hydrocarbons with free product in groundwater. Please be advised, pursuant to Section 2655 of Article 5, Title 23 of the California Code of Regulations, the owner or operator shall conduct free product removal in a manner that will minimize the spread of contamination into previously uncontaminated zones. Free product removal reports must be prepared in compliance with said section and be submitted within 45 days upon completion of interim remediation.

The last quarterly report (QMR) we have is dated October 1993, presenting results of the July 1993 sampling event. Future reports should be submitted in a timely manner, usually within 45 days upon completion of field activities. QMRs of the October 1993 and January 1994 sampling events should be submitted to this office **within 15 days of the date of this letter.** Also, field activities for the implementation of the RAP should commence within 30 days of the date of this letter, or by **April 16, 1994.**

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) 271-4530.

Sincerely,

eva chu
Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office
files

BPoak3

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0403

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

StID 3877

March 4, 1993

Mr. Scott Hooton
BP Oil
16400 Southcenter Parkway, Suite 301
Tukwila, WA 98188

Subject: RAP for BP Oil Site No. 11133, 2220 98th Ave., Oak

Dear Mr. Hooton:

This office has reviewed RESNA's Remedial Action Plan, dated January 20, 1993, for the above referenced site. The plan is acceptable and field work should commence within 45 days of the date of this letter. Groundwater sampling should continue on a quarterly basis.

If you have any questions or comments, I can be reached at (510) 271-4530.

Sincerely,

Eva Chu
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB
Keith Romstad, RESNA, 73 Digital Dr., Suite 108, Novato, CA 94949-5704
Edgar Howell/files

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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0403

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

StID 3877

October 14, 1992

Pete DeSantis
BP Oil
16400 S. Center Pkwy., Suite 301
Tuckwilla, WA 98188

Subject: Corrective Action Plan for BP Station 11133, 2220 98th Ave., Oakland 94603

Dear Mr. DeSantis:

This office has reviewed the file for the above referenced site. Quarterly monitoring reports dating back to January 1990 consistently show wells MW-1 and RW-1 to have free product. Other monitoring wells have had up to 57,000 ppb benzene.

A letter dated February 20, 1992, from Mr. Brian Oliva of this office, requested that interim remediation be taken for product removal. To date we are not in receipt of reports documenting any interim action taken to abate the potential effects of an unauthorized release of petroleum hydrocarbons with free product in groundwater.

Please be advised, pursuant to Section 2655 of Article 5, Title 23 of the California Code of Regulations, the owner or operator shall conduct free product removal in a manner that will minimize the spread of contamination into previously uncontaminated zones. Free product removal reports must be prepared in compliance with said section and be submitted within 45 days upon completion of interim remediation.

At this time, **you are hereby requested to develop a Corrective Action Plan (CAP) for further investigation of this site, and to identify and evaluate all feasible alternatives for cleanup of soil and groundwater, both on- and off-site, caused by the unauthorized release of petroleum products.**

The referenced CAP is due in this office **within 45 days of the date of this letter.** Include a time schedule for the completion of each aspect of the remediation process, as well as a proposal for the determination of the lateral extent of soil contamination at this site. Interim remedial action can occur concurrently with any phase of corrective action, that is, free product removal should begin as soon as possible.

Please be advised that this is a formal request for technical reports pursuant to California Water Code Section 13267(b). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency or the RWQCB. Failure to respond or a late response may result in referral of this case to the RWQCB or Alameda County District Attorney to consider for enforcement action.

If you have any questions or comments on the content of this letter, please contact me at (510) 271-4530.

Sincerely,

Eva Chu
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB
Gil Jensen, Alameda County District Attorney's Office
Edgar Howell/files
Brian Oliva, ACEHD

bpoak

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

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

(4)

April 22, 1992

Chester Bennett
Tait & Associates
2880 Sunrise Blvd., Suite 206
Rancho Cordova, CA 95742

Subject: BP Oil Co. Sites in Alameda County

Dear Mr. Bennett:

Enclosed you will find copies of the Alameda County, Department of Environmental Health, "Inspection Form" for the following sites:

(R0511) 1) BP Oil #11270, 3255 MecCartney , Alameda, CA
(R0560) 2) BP Oil #11128, 4707 First Street, Livermore, CA
(R0403) 3) BP Oil #11133, 2220 98th Ave., Oakland, CA
(R0346) 4) BP Oil #11105, 3519 Castro Valley Blvd, Castro Valley, CA

Please feel free to contact this office if you have any questions concerning the above sites or any other BP Oil facilities under the authority of the Alameda County Division of Hazardous Materials. The telephone number is (510) 271-4320

Sincerely,

Brian P. Oliva

Brian P. Oliva, REHS
Hazardous Materials Specialist

cc: Mark Thomson, Alameda County DA's Office
Pete DeSantis, BP Oil Co.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0403

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

Certifed Mailer #: P 367 604 328

September 13, 1991

BP Oil Co.
2220 - 98th Avenue
Oakland, CA 94603
Attn: Fara Parkzad

SECOND NOTICE OF VIOLATION

SUBJ: Five-Year Permit to Operate Three Underground Storage Tanks at BP Oil Company, Facility #11133, 2220 - 98th Avenue, Oakland, California 94603

Dear Mr. Pakzad:

On July 18, 1991, Young Fong 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, three double-walled underground storage tanks exist at the subject facility. During this inspection, Mr. Fong noted the following violations of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (H&SC):

1) Section 2635(b)(6) & (7), CCR and Section 25289(h) of H&SC - This office has not received the initial tank and piping tightness/leak detection test results for all the tanks at the subject facility. Please provide us with a copy of test results;

2) 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:

   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 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 Pollualert and continuous pipeline leak detectors (e.g. "Red Jacket").

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. Pollualert, 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. <u>Spill/Leak Response Plan</u> - 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 5, Title 23, CCR;

You may utilize the requirements for spill/leak response plan according to Sections 2632(e)(2) 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.

<u>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.</u>

2. <u>Section 2634(c), Title 23, CCR</u> - 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:

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.

<u>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.</u>

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.

3) <u>Section 2635, Title 23, CCR</u> - Our office has not received as-built documents regarding the subject site. Per the above section, you are required to submit these documents to our office and should include at least the following:

a) Drawings that show the locations of all tanks, piping, sumps, overfill basins, etc.;

b) Materials used for tank and piping (i.e. brands, single or double-walled, steel or PVC, etc.)

c) Locations and type of equipment used for continuous leak detection. Include types of probes and probe positions.

4) Our agency does not have on file current copies of underground storage tank permit applications. Per Section 2711, you are required to submit to our agency correctly and completely filled out Form A for the facility and Form B for each underground storage tank.

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 the required materials to this office within 10 working days, i.e. no later than September 27, 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 ($5,000) 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 Oliva or myself, at (510) 271-4320.

Sincerely,

Thomas Peacock
Sr. Hazardous Materials Spec.

FYF:fyf

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

R0403

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

July 26, 1991

Mr. Fara Pakzad
BP Oil Co.
2200 - 98th Avenue
Oakland, CA 94603

NOTICE OF VIOLATION

SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks at BP Oil Company Facility #11133, 2200 - 98th Avenue Oakland, California 94603
2220

Dear Mr. Pakzad:

On July 18, 1991, Young Fong 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, three underground storage tanks exist at the subject facility. During this inspection, Mr. Fong noted the following violations of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (H&SC):

1) 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 under-ground storage tank owner is required to have the automatic line leak detector and underground pressurized piping tightness tested annually. Please provide our office with the results of annual tank tightness tests, automatic line leak detection tests and pipeline leak detection tests.

2) The double-walled tanks which were installed in 1986, you are required to submit the following items:

a) Correctly completed underground storage tank permit application - Form B for each tank.

b) 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 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;

c) 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 30 days, i.e. no later than August 29, 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.

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

Sincerely,

for

Thomas Peacock, Sr. Hazmat Specialist
Hazardous Materials Division

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

enclosures