

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY

ALEX BRISCOE, Director



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

November 17, 2010

Charles Carmel (*Sent via E-mail to: [charles.carmel@bp.com](mailto:charles.carmel@bp.com)*)  
Atlantic Richfield Company  
(A BP Affiliated Company)  
P.O. Box 1257  
San Ramon, CA 94583

Bill Borgh (*Sent via E-mail to [Bill.Borgh@conocophillips.com](mailto:Bill.Borgh@conocophillips.com)*)  
Conoco Phillips  
76 Broadway Street  
Sacramento, CA 95818

Steve Mahoney  
30 Northwest Street  
Yerlington, NV 89447

Khalid & Romana Usman  
3670 Ralston Avenue  
Hillsborough, CA 94010

Subject: Corrective Action Plan Approval & Public Participation for Fuel Leak Case No. RO0000426 and GeoTracker Global ID T0600100217, BP #11109, 4280 Foothill Boulevard, Oakland, CA 94601

Dear Mr. Carmel, Mr. Borgh, Mr. Mahoney & Mr. & Mrs. Usman:

Thank you for the recently submitted document entitled, "Revised Feasibility Study and Corrective Action Plan," dated October 11, 2010, which was prepared by ARCADIS U.S., Inc. (ARCADIS) for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned report/work plan for the above-referenced site. ARCADIS determined that combined Dual-phase Extraction (DPE) would be the most cost-effective remedial alternative to clean up the site. To that end, ARCADIS recommends installing a mobile DPE treatment system at the site.

The remediation alternative presented in the above-mentioned report is acceptable provided that the technical comments presented below are incorporated into a Final CAP. Please note that public participation is a requirement for the CAP process. Therefore, you are required to notify potentially affected stakeholders who live or own property in the area surrounding of the proposed remediation, described in the above-mentioned Feasibility Study, through the mailing of a fact

sheet (enclosed). Please send us your personal certification that the fact sheet has been mailed to addresses listed in the enclosed List of Recipients.

Public comments on the proposed remediation will be accepted for a period of thirty days beginning Monday, November 22, 2010 through Wednesday, December 22, 2010. Following the public comment period, the comments received, including ACEH's technical comments described below, must be addressed and incorporated into a Final CAP.

### **TECHNICAL COMMENTS**

1. **GeoTracker Compliance** – A review of the case file and the State Water Resources Control Board's (SWRCB) GeoTracker website indicate that an electronic copy of the CAP has not been submitted, rendering the site to non-compliance status. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please upload all applicable electronic submittal types such as the analytical data (EDF), survey data (GEO\_XY and GEO\_Z), and PDF reports from July 1, 2005 to current to GeoTracker by the date specified below. Electronic reporting is described below.
2. **Verification Soil, Soil Vapor and Groundwater Sampling** – As mentioned above, ARCADIS proposes to operate a DPE system to remediate the site. Although ARCADIS proposed cleanup goals and groundwater sampling, ARCADIS did not discuss verification sampling at the conclusion of the remedial action. Please note that verification sampling is required to determine treatment system effectiveness.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **November 30, 2010** – Personal Certification verifying Fact Sheet Mailing
- **December 22, 2010** – End of 30-day Public Participation Period
- **January 15, 2011** – Final CAP
- **Due within 30 Days of Sampling** – System Start-up Report

Mr. Carmel, Mr. Borgh, Mr. Mahoney & Mr. & Mrs. Usman  
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Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,

Paresh C. Khatri  
Hazardous Materials Specialist

Enclosure: Public Participation Fact Sheet  
List of Recipients  
Responsible Party(ies) Legal Requirements/Obligations  
ACEH Electronic Report Upload (ftp) Instructions

cc: Hollis Phillips, ARCADIS, 2033 North Main Street, Suite 340, Walnut Creek, CA 94596  
(Sent via E-mail to: [hollis.phillips@arcadis-us.com](mailto:hollis.phillips@arcadis-us.com))  
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland,  
CA 94612-2032 (Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com))  
Donna Drogos, ACEH (Sent via E-mail to: [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Paresh Khatri, ACEH (Sent via E-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
GeoTracker  
File



## FACT SHEET ON ENVIRONMENTAL ASSESSMENT

### BP #11109 (CURRENTLY HIGH STREET GASOLINE)

4280 Foothill Boulevard, Oakland, CA 94601

Fuel Leak Case No. RO0000426 and

GeoTracker Global ID T0600100217

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

#### Site Remediation Summary

This fact sheet has been prepared to inform community members and other interested stakeholders regarding the status of a proposed soil and groundwater cleanup at the British Petroleum (BP) Station #11109 located at 4280 Foothill Boulevard, Oakland, California. BP, the lead responsible party for the fuel leak case is proposing in-situ dual-phase extraction (DPE) as the remediation technology to clean up the site.

#### Site Background

The site is currently in use as an independently operated service station located on the north corner of Foothill Boulevard and High Street in a mixed commercial and residential area of Oakland. The site was operated by Mobil Oil Corporation as Mobil Service Station No. 10-H69 since at least the early 1970's. BP acquired the station from Mobil in May 1989 and operated the station under the BP brand. BP sold the station in 1994 to Tosco, which was acquired by ConocoPhillips who operated a 76-branded station for some time. Currently, the station operates under the independent brand High Street Gasoline. A church borders the station to the northeast and single family residences border the station to the northwest. Fremont High School's paved recreation courts and playing field are located across High Street to the southeast.

Gasoline contamination was discovered during a subsurface investigation conducted in 1989. In the early 1990's, several investigations, consisting of soil boring and monitoring well installations, were conducted at the site. Consecutive groundwater sampling has been conducted dating back to 1991.

#### Remediation Alternative: Multi-Phase Extraction

Dual-phase extraction (DPE) is proposed to remediate the soil and groundwater at the site. DPE removes vapor phase, dissolved phase, and separate phase contaminants from the soil and groundwater. In DPE, vapor and liquid are removed from each well using a high vacuum, with the liquids stored into a holding

tank. The resulting separate phases (liquid and vapor) are treated by passing through granular activated carbon (GAC) (i.e. charcoal), internal combustion engine (ICE), catalytic oxidizer (CatOx) and air stripper, or other method to further remove contamination from liquid and vapor, which is then discharged to ambient air, and/or to the sanitary or storm sewer. DPE systems typically require permanently-installed high-amperage electrical service, as well as natural gas or propane to operate.

#### Next Step

BP is working with Alameda County Environmental Health (ACEH) to implement a soil and groundwater cleanup at the site. The proposed alternative is described in a report prepared by ARCADIS on behalf of BP: "Revised Feasibility Study and Corrective Action Plan," dated October 11, 2010. The public is invited to review and comment on the cleanup action proposed in the Report. The report is available on ACEH's website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State Water Resources Control Board's GeoTracker website (<http://www.geotracker.waterboards.ca.gov/>). The report and case file are also available for review at the ACEH located at 1131 Harbor Bay Parkway in Alameda, California. Please send a fax to 510-337-9335 to request a date and time to review the case file. Please send written comments regarding the corrective action to Paresh Khatri at the address below. All written comments received by **December 22, 2010** will be forwarded to the Responsible Party and will be considered and responded to prior to a final determination on the proposed cleanup.

*For Additional information, please contact:*

Paresh Khatri	Hollis Phillips
Alameda County Environmental Health	ARCADIS U.S., Inc.
1131 Harbor Bay Parkway, Ste 250	100 Montgomery Street, Suite 300
Alameda, CA 94502	San Francisco, CA 94104
Phone: 510-777-2478	Phone: 415-374-2744
E-mail: <a href="mailto:paresh.khatri@acgov.org">paresh.khatri@acgov.org</a>	E-mail: <a href="mailto:Hollis.Phillips@arcadis-us.com">Hollis.Phillips@arcadis-us.com</a>



List of Recipients  
RO0000426  
November 17, 2010

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AGUIRRE ROBERT J TR & LEIGHKENDAL  
KEITH A TR  
1967 COURTLAND AVE  
OAKLAND CA 94601

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OAKLAND CA 94601

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6151 CHEVY CHASE DR  
LAUREL MD 20707

CASTELLANOS AMADEO & HORALIA  
4236 FOOTHILL BLVD  
OAKLAND CA 94601

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P.O. BOX 3288  
SAN JOSE CA 95156

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OAKLAND CA 94601

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879 HILLSIDE AVE  
ALBANY CA 94706

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OAKLAND CA 94619

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141 WOODLAND WAY  
PIEDMONT CA 94611

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OAKLAND CA 94601

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2501 CHANNING WAY  
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OAKLAND CA 94601

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1933 COURTLAND AVE  
OAKLAND CA 94601

List of Recipients  
RO0000426  
November 17, 2010

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RESIDENT  
4246 FOOTHILL BLVD  
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RESIDENT  
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OAKLAND CA 94601

RESIDENT  
4215 FOOTHILL BLVD  
OAKLAND CA 94601

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1723 HIGH ST  
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RESIDENT  
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OAKLAND CA 94601

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RESIDENT  
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RESIDENT  
4411 FOOTHILL BLVD  
OAKLAND CA 94601

RESIDENT  
4610 FOOTHILL BLVD  
OAKLAND CA 94601

SINGA DEVELOPMENT LLC  
P O BOX 10664  
OAKLAND CA 94610

SWARTZ LEONARD R TR & HUNT NORLENE  
A TR  
105 TUSCANY WAY  
DANVILLE CA 94506

USMAN KHALID & ROMANA TRS  
3670 RALSTON AVE  
HILLSBOROUGH CA 94010

## Responsible Party(ies) Legal Requirements/Obligations

### REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and [other](#) data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)).

### 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.

### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans 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.

### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

### 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 Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.