

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT
5-5-05

May 4, 2005

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

Jennifer Sedlachek
ExxonMobil Refining and Supply Co.
7096 Piedmont Ave., #194
Oakland, CA 94611

Liz Sewell
ConocoPhillips
76 Broadway
Sacramento, CA 95818

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

Subject: Fuel Leak Case No. RO0000456, BP #11102, 100 MacArthur Blvd., Oakland, California – Workplan Approval

Dear Mr. Christie, Ms. Sedlachek, and Ms. Sewell:

Alameda County Environmental Health (ACEH) has reviewed your April 28, 2005, *Revised Soil and Groundwater Investigation Workplan* prepared by URS Corporation, Inc., and the case file for the above-referenced site. URS proposes: 1) depth-discrete groundwater sampling from three soil borings immediately upgradient of the storm drain line beneath MacArthur Blvd., 2) two soil borings adjacent to the dispenser islands and USTs, and 3) two onsite soil borings to further characterize the site. The site is located near ACEH case No. RO-455, Unocal #1871. We concur with your workplan provided the following conditions are met:

1. The technical comments listed below will be addressed prior to conducting field work, and documentation will be provided in the report requested below.
2. Soil borings SB-4 and SB-5 will be drilled as close as practicable to the dispenser islands and USTs, and to the total depth of apparent source area contamination. ACEH typically recommends that soil samples be collected and analyzed from a boring within the footprint of a former UST field (or point of fuel release) to at least 10 ft below the total depth of contamination, as identified by field screening of samples.
3. 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.
4. 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.

TECHNICAL COMMENTS

1. Investigation Sequence

Due to the typically high rate of natural attenuation of petroleum hydrocarbons away from the source area, and to the significantly higher horizontal vs. vertical hydraulic conductivity of naturally occurring sediments (i.e. native soils), the downgradient vertical distribution in groundwater is likely to be 1) dependent on lithology, and 2) closely related to the depth(s) of source area contamination. Accordingly, ACEH recommended in our January 27, 2005, letter that the groundwater investigation consider the results of source area delineation. URS proposes sample collection from borings SB-1 through SB-3 at depths of 12, 15 and 18 ft bgs. ACEH provisionally concurs with this proposal; however, the actual depths of groundwater sampling from borings SB-1 through SB-3 and SB-6 through SB-8 need to be determined in the field based on observations of vertical contamination distribution in the source area (borings SB-4 and SB-5). Please confirm the investigation sequence in the report requested below.

2. 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 in part due to its potential occurrence as a MTBE degradation product). Analysis for lead scavengers, ETBE, and DIPE 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.

REPORT REQUEST

Please submit your *Soil and Water Investigation Report* by **August 4, 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

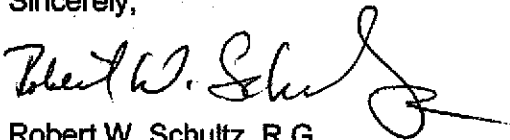
Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

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 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, 500 12th St., Ste. 200, Oakland, CA 94607-4014
Donna Drogos, ACEH
Don Hwang, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sewell
1-31-05

January 27, 2005

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

Jennifer Sedlachek
ExxonMobil Refining and Supply Co.
7096 Piedmont Ave., #194
Oakland, CA 94611

Liz Sewell
ConocoPhillips
76 Broadway
Sacramento, CA 95818

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Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

Subject: Fuel Leak Case No. RO0000456, BP #11102, 100 MacArthur Blvd., Oakland, California – Workplan Approval

Dear Mr. Christie, Ms. Sedlachek, and Ms. Sewell:

Alameda County Environmental Health (ACEH) has reviewed your April 16, 2004, *Soil and Groundwater Investigation Workplan* prepared by URS Corporation, Inc., and the case file for the above-referenced site. We have also discussed the site with URS; a copy of URS' email to ACEH is attached to this letter. ACEH concurs that, based on review of groundwater data for ConocoPhillips wells MW-10 and MW-11, associated with the nearby service station at 96 MacArthur Blvd., proposed groundwater sampling locations SB-2, SB-5 and SB-6 do not appear necessary. As recommended by URS in the attached email, please revise your workplan and submit technical reports following the schedule below. In addition, we request that you address the following technical comments in your revised workplan.

TECHNICAL COMMENTS

1. Preferential Pathways

URS states that the storm drain beneath MacArthur Blvd. may be submerged or partially submerged during seasonal increases in groundwater elevation. ACEH is concerned that 1) contaminated groundwater may be entering the storm drain or migrating via higher permeability backfill surrounding the storm drain, and 2) groundwater flow direction may be seasonally influenced by infiltration into the storm drain. The storm drain flows to Lake Merritt (a tidal estuary) or the San Francisco Bay. Please propose tasks to evaluate this potential risk in the revised workplan requested below.

2. Delineation of Source Area Contamination

In accordance with 23 CCR 2725(a), we require that you define the likely vertical extent of contamination. As a preliminary step in defining the vertical extent of source area contamination, ACEH typically recommends that soil samples be collected and analyzed from a boring within the footprint of a former UST field (or point of fuel release) to at least 10 ft below the total depth of contamination, as identified by field screening of samples. Please include tasks to vertically define the source area in the revised workplan requested below.

3. Delineation of Groundwater Plume

ACEH requires that sufficient data be collected to define the likely three-dimensional extent of your groundwater plume. Significantly, your findings relative to vertical distribution of soil contamination (Comment 2, above), need to be considered in your groundwater evaluation. ACEH requires that grab groundwater sampling be depth-discrete with a maximum screening interval of 5 ft and that monitoring wells sand pack be 5 ft thick or less. Please propose investigation tasks to fully define your groundwater plume in the revised workplan requested below.

REPORT REQUEST

Please submit your *Revised Soil and Water Investigation Workplan* by **April 27, 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

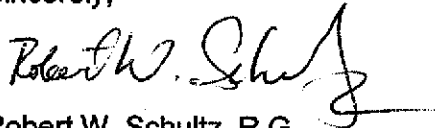
Please note that delays in investigation, late reports or enforcement actions by ACEH may result in you becoming ineligible to receive cleanup cost reimbursement from the state's Underground Storage Tank Cleanup Fund (senate Bill 2004).

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 call me at (510) 567-6719 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
Donna Drogos, ACEH
Don Hwang, ACEH
Robert W. Schultz, ACEH

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



8-01-01

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

July 31, 2001

Scott Hooton
BP Oil Co.
Midwest Environmental Services
295 SW 41st St.
Bldg. 13, Suite N
Renton, WA 98055

Dear Mr. Hooton:

Subject: Former BP Oil Site No. 11102, 100 MacArthur Blvd., Oakland, CA
RO0000456

Your letter of May 15, 2001 indicated that Tosco would be responsible for the tasks listed in our letter of July 18, 2001. However, we have received a copy of a letter dated June 22, 2001 to you from David De Witt of Tosco disputing this. We hope that the two of you will be able to resolve differences so that the tasks requested can proceed. If I may be of any assistance, please don't hesitate to call me at 510/567-6746.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Hwang". The signature is written in a cursive, somewhat stylized font.

Don Hwang
Hazardous Materials Specialist

C: David De Witt, Tosco Marketing Co., 2000 Crow Canyon Pl., Suite 400,
San Ramon, CA 94583

file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



05-04-01

May 3, 2001

Scott Hooton
BP Oil Co.
Midwest Environmental Services
295 SW 41st St.
Bldg. 13, Suite N
Renton, WA 98055

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

Dear Mr. Hooton:

Subject: Former BP Oil Site No. 11102, 100 MacArthur Blvd., Oakland, CA
RO0000456

"3rd Quarter 2000 Monitoring..." dated November 15, 2000 prepared by Blaine Tech Services was reviewed. These samples were collected on September 28, 2000. Methyl Tertiary-Butyl Ether (MTBE) concentrations found in monitoring wells MW-1 and MW-2 were 28,000 ug/l and 15,000 ug/l, respectively. Total Petroleum Hydrocarbons-Gasoline (TPH-G) concentrations found in MW-1 and MW-2 were 2,700 ug/l and 1,600 ug/l, respectively.

If the results for MTBE for the next round of sampling are consistent with those obtained recently, then the sampling frequencies will need to increase to quarterly and a Corrective Action Plan, which includes an assessment of impacts, a feasibility study, and applicable cleanup levels will be required. Additionally, further delineation of the plume may be necessary. As stated in our letter dated May 19, 1999, because MW-1 was installed in the gravel backfill of the former waste oil tank pit, the determination of gradient using groundwater levels from this well may be inaccurate. Therefore, groundwater flow directions and gradients may need to be confirmed by an acceptable method, which could include the installation of another well in native soil or using wells adjacent to the site. If you have any questions, you may call me at 510/567-6746.

Sincerely,


Don Hwang
Hazardous Materials Specialist

a
C: David DeWitt, Tosco Marketing Co., 2000 Crow Canyon Pl., Suite 400, San Ramon, CA 94583

file

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RD456

ENVIRONMENTAL HEALTH SERVICES

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

May 19, 1999

Scott Hooton
BP Oil Company
Environmental Remediation Management
295 SW 41st Street
Renton, Washington 98055-4931

STID: 1108

Re: Investigations at Former BP Oil Site No. 11102, located at 100 MacArthur Blvd.,
Oakland, CA

Dear Mr. Hooton,

This office has reviewed Blaine Tech Services' First Quarter 1999 Groundwater Monitoring Report. The following is a list of comments and requirements in response to our review:

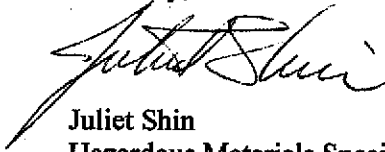
- MTBE and TPHg concentrations in the "downgradient" well MW-2 increased dramatically, after 1.5 to 2 years of NonDetect. This concerns our office, because it is suggestive of plume migration or a recent release. If these concentrations persist, efforts must be made to further delineate and characterize this plume. If further delineation work is eventually conducted, the groundwater flow direction at the site must be confirmed. Per our meeting on March 16, 1999, one of my concerns was that Well MW-1 was installed in the gravel backfill of the former waste oil tank pit and that the water levels collected from this well may be inaccurate and producing erroneous gradient determinations. Therefore, as part of possible future delineation work, groundwater flow directions and gradients will need to be confirmed by an acceptable method, which could include the installation of another well in native materials to tie into.
- Well MW-3 was not sampled in this last monitoring event. No mention was made in Blaine Tech's report as to why this well was not analyzed. In future monitoring events, this well is required to be sampled with the other two on-site monitoring wells. If a vehicle is obstructing this well, arrangements must be made with the operator to come out at a time when this well is accessible.
- This report's chain-of-custody did not include an explanation as to which wells correlated to the Sample IDs "A" and "B". Therefore, there is no way for this office to confirm whether the concentrations provided in the laboratory analytical results correlate to the wells indicated in the report. Future chain-of-custody forms should make clear which samples correlate to which wells.

Lastly, per your April 24, 1999 cover letter, the next monitoring event in September 1999 will include the analysis for chlorinated solvents using Method 8010, oxygenates using Method 8260, and TPHd for Wells MW-1 and MW-2. As stated above, Well MW-3 should continue to be included in the monitoring events. Additionally, per your letter, work is currently underway to perform on-site and off-site utility line surveys and slug tests on all three monitoring wells.

Scott Hooton
Re: 100 MacArthur Blvd.
May 19, 1999
Page 2 of 2

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

Cc: Leroy Griffin
City of Oakland Hazardous Materials
505 14th St., Ste 702
Oakland, CA 94612

Files-JMS

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

Ro# 456

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250
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(510) 567-6700
(510) 337-9335 (FAX)

January 05, 1999

Mr. Scott Hooton
BP Oil Company
Environmental Remediation Management
295 SW 41st Street
Renton, Washington 98055-4931

STID: 1108

Re: Required investigations at BP Oil Company Service Station No. 11102, located at
100 MacArthur Boulevard, Oakland, California

Dear Mr. Hooton,

Investigations were initiated at the site in 1988 with Mobil Oil Company's (Mobil) removal of a 550-gallon waste oil underground storage tank (UST). One soil sample was collected from below the UST at approximately 9-feet below ground surface (bgs) and another soil sample was collected from the 15-cubic yards of soil excavated from the UST pit which was stockpiled on site. These two soil samples were analyzed for Total Petroleum Hydrocarbons as Diesel (TPHD), Total Oil & Grease (TOG), and Volatile Organic Compounds (VOCs) using Method 8240. Although no apparent holes or cracks were noted in the UST and low levels of TPHD and TOG were detected in the soil sample collected from below the UST, elevated levels of TPHD at 1,700 parts per million (ppm) and TOG at 65,000 ppm were identified in the stockpiled soil sample which warranted further investigations.

In October 1989, three monitoring wells, MW-1 through MW-3, were installed at the site. The initial analysis of samples collected from these wells identified very low levels of benzene, toluene, and total xylenes in soil samples collected from Wells MW-2 and MW-3, and up to 6.5 parts per billion (ppb) benzene, 0.6ppb toluene, and 0.9ppb 1,2-Dichloroethane (DCA) in groundwater samples collected from Wells MW-1 and MW-2.

Mobil Oil Company conducted quarterly groundwater monitoring at the site until mid-1992, when BP Oil Company purchased the business. Quarterly groundwater monitoring of these wells has continued to the present time, with Well MW-1, located closest to the former waste oil UST, being analyzed for TPH as Gasoline (TPHG), TPHD, TOG, BTEX, and Halogenated Volatile Organic Compounds (HVOCs). Wells MW-2 and MW-3 were analyzed for the same constituents as Well MW-1, except analyses for HVOCs and TPHD were intermittent and appear to have been discontinued in and around 1991/1992. The observed peaks of higher contaminant concentrations in all three wells appear to have correlated with shallower groundwater depths at roughly 11- to 12-feet bgs. This could be due to the leaching of residual soil contamination at these depths.

Although the most elevated levels of DCA have been identified in samples collected from Well MW-2 in 1991 and 1992, no further analyses for this constituent has been conducted on groundwater samples from this well. The levels of DCA observed in Well MW-2 may be coming

Scott Hooton
Re: 100 MacArthur Blvd.
January 05, 1999
Page 2 of 3

from the former waste oil UST, since Well MW-2 is located downgradient from this location. Consequently, **this office is requiring that analysis for DCA be conducted for this well in the next sampling event.** Additionally, levels of TPHD appear to have increased in upgradient Well MW-1 since monitoring began in 1989, however, downgradient Well MW-2 has never been analyzed for TPHD and downgradient Well MW-3 has not been analyzed for TPHD since 1992. **The next round of groundwater sampling must include analyses for TPHD in both these wells.**

Analysis for Methyl Tertiary Butyl Ether (MTBE) began for Wells MW-1 and MW-2 in 1994, and for Well MW-3 in 1995. **Due to the elevated levels of MTBE being identified in Wells MW-1 and MW-2, additional work must be conducted to delineate the extent of the MTBE plume in the downgradient directions which vary from westerly to southerly.** Additionally, there is some concern that a more permeable sandy lense may be transporting groundwater and contaminants such as MTBE in other directions. Based on the boring logs for MW-1 through MW-3, significantly more permeable soils of sand and gravel were noted in Well MW-1, as opposed to the strikingly different soil types of silt and clay in Wells MW-2 and MW-3, which suggests a sandy lense, whose size is unknown, that could be influencing local groundwater flow to be different than those already noted at the site. **Therefore, the characterization of the MTBE plume should include delineation in the "upgradient" directions to the north/northeast.** Although you mentioned in a May 18, 1993 letter to this office that no further investigations were possible upgradient of MW-1 due to a retaining wall, I would like to meet with you or your consultant out at the site to consider what potential there may be to work around this retaining wall.

Based on the results of research conducted by Lawrence Livermore National Laboratory on MTBE analyses, the San Francisco Bay Regional Water Quality Control Board (RWQCB) has issued guidelines stating that "it is recommended that at least one groundwater sample per site which was positive for MTBE by EPA Method 8020A (or 8021B) be analyzed by EPA method 8240B (or 8260A) to verify the correct identification of MTBE (i.e., split samples from a minimum of one well from each site). We recommend that confirmation analysis be performed for the sample containing the highest MTBE concentration from the site based on Method 8020A (or 8021B) values. For these samples the 8240B (or 8260A) value should be reported." Additionally, per the request of RWQCB, you are required to include the analysis for the following additional oxygenates and lead scavengers in the next round of sampling using Methods 8260 and 8010: Tertiary Amyl Methyl Ether (TAME), Diisopropyl Ether (DIPE), Ethyl Tertiary Butyl Ether (ETBE), Tertiary Butyl Alcohol (TBA), and Ethylene Dibromide (EDB).

According to the December 1989 Well Installation Report, the site's three monitoring wells were surveyed to an arbitrary benchmark on site. Per RWQCB guidelines, these wells must be surveyed to Mean Sea Level to an accuracy of 0.01 foot.

Per the Oakland Museum's "Creek and Watershed Map of Oakland and Berkeley", there appears to be a stormwater culvert running along MacArthur Boulevard immediately adjacent to the downgradient boundary of the site. Apparently this culvert discharges into Lake Merritt. Please

Scott Hooton
Re: 100 MacArthur Blvd.
January 05, 1999
Page 3 of 3

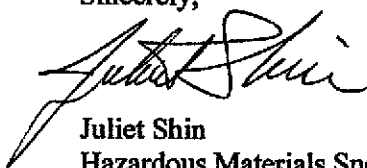
provide information to this office on the details of this culvert, (such as the depth, type of backfill material, diameter of culvert, slope, etc) to assist us in determining whether this culvert could be influencing the migration of the plume.

Currently, the site's wells are on a semi-annual sampling frequency, with the last groundwater sampling event being conducted on June 18, 1998. The next groundwater sampling event should have taken place in December 1998, and a report documenting the work should be submitted within the next month. All future groundwater monitoring reports shall include, among others, the following elements:

- Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- Status of groundwater contamination characterization
- Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- Recommendations or plans for additional investigative work or remediation

A workplan addressing the above plume delineation work shall be submitted to this office within 60 days of the date of this letter, (i.e., by March 02, 1999). A report documenting the work shall be submitted to this office within 45 days after completing field activities. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

Cc: Tina Berry
TOSCO Marketing Company
2000 Crow Canyon Place, Ste 400
San Ramon, CA 94583

Leroy Griffin
Oakland Hazardous Materials
505 14th Street, Ste 702
Oakland, CA 94612

Files-JMS

ALAMEDA COUNTY
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DAVID J. KEARS, Agency Director



R0#456

ENVIRONMENTAL HEALTH SERVICES

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(510) 337-9335 (FAX)

January 05, 1999

Tina Berry
TOSCO Marketing Company
2000 Crow Canyon Place, Ste 400
San Ramon, CA 94583

STID: 1108

Re: Required investigations at BP Oil Company Service Station No. 11102, located at
100 MacArthur Boulevard, Oakland, California

Dear Ms. Berry,

Recently I have been designated as the case worker for the above site. Although you stated in an earlier communication that BP Oil Company (BP) is currently the primary responsible party at the site, BP has stated that the issues of responsibility have not yet been established between TOSCO Marketing Company (TOSCO) and BP. Currently TOSCO is listed as a Responsible Party for investigations at the above site along with BP, based on the fact that TOSCO purchased the property from BP after the observed release. Therefore, this letter is being directed to both TOSCO and BP.

Investigations were initiated at the site in 1988 with Mobil Oil Company's (Mobil) removal of a 550-gallon waste oil underground storage tank (UST). One soil sample was collected from below the UST at approximately 9-feet below ground surface (bgs) and another soil sample was collected from the 15-cubic yards of soil excavated from the UST pit which was stockpiled on site. These two soil samples were analyzed for Total Petroleum Hydrocarbons as Diesel (TPHD), Total Oil & Grease (TOG), and Volatile Organic Compounds (VOCs) using Method 8240. Although no apparent holes or cracks were noted in the UST and low levels of TPHD and TOG were detected in the soil sample collected from below the UST, elevated levels of TPHD at 1,700 parts per million (ppm) and TOG at 65,000 ppm were identified in the stockpiled soil sample which warranted further investigations.

In October 1989, three monitoring wells, MW-1 through MW-3, were installed at the site. The initial analysis of samples collected from these wells identified very low levels of benzene, toluene, and total xylenes in soil samples collected from Wells MW-2 and MW-3, and up to 6.5 parts per billion (ppb) benzene, 0.6ppb toluene, and 0.9ppb 1,2-Dichloroethane (DCA) in groundwater samples collected from Wells MW-1 and MW-2.

Mobil Oil Company conducted quarterly groundwater monitoring at the site until mid-1992, when BP purchased the property. Quarterly groundwater monitoring of these wells has continued to the present time, with Well MW-1, located closest to the former waste oil UST, being analyzed for TPH as Gasoline (TPHG), TPHD, TOG, BTEX, and Halogenated Volatile Organic Compounds (HVOCs). Wells MW-2 and MW-3 were analyzed for the same constituents as Well MW-1, except analyses for HVOCs and TPHD were intermittent and appear to have been discontinued in and around 1991/1992. The observed peaks of higher contaminant

Ms. Tina Berry
Re: 100 MacArthur Blvd.
January 05, 1999
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concentrations in all three wells appear to have correlated with shallower groundwater depths at roughly 11- to 12-foot bgs. This could be due to the leaching of residual soil contamination at these depths.

Although the most elevated levels of DCA have been identified in samples collected from Well MW-2 in 1991 and 1992, no further analyses for this constituent has been conducted on groundwater samples from this well. The levels of DCA observed in Well MW-2 may be coming from the former waste oil UST, since Well MW-2 is located downgradient from this location. **Consequently, this office is requiring that analysis for DCA be conducted for this well in the next sampling event.** Additionally, levels of TPHD appear to have increased in upgradient Well MW-1 since monitoring began in 1989, however, downgradient Well MW-2 has never been analyzed for TPHD and downgradient Well MW-3 has not been analyzed for TPHD since 1992. **The next round of groundwater sampling must include analyses for TPHD in both these wells.**

Analysis for Methyl Tertiary Butyl Ether (MTBE) began for Wells MW-1 and MW-2 in 1994, and for Well MW-3 in 1995. **Due to the elevated levels of MTBE being identified in Wells MW-1 and MW-2, additional work must be conducted to delineate the extent of the MTBE plume in the downgradient directions which vary from westerly to southerly.** Additionally, there is some concern that a more permeable sandy lense may be transporting groundwater and contaminants such as MTBE in other directions. Based on the boring logs for MW-1 through MW-3, significantly more permeable soils of sand and gravel were noted in Well MW-1, as opposed to the strikingly different soil types of silt and clay in Wells MW-2 and MW-3, which suggests a sandy lense, whose size is unknown, that could be influencing local groundwater flow to be different than those already noted at the site. **Therefore, the characterization of the MTBE plume should include delineation in the "upgradient" directions to the north/northeast.** Although Mr. Hooton mentioned in a May 18, 1993 letter to this office that no further investigations were possible upgradient of MW-1 due to a retaining wall, I would like to meet with you or your consultant out at the site to consider what potential there may be to work around this retaining wall.

Based on the results of research conducted by Lawrence Livermore National Laboratory on MTBE analyses, the San Francisco Bay Regional Water Quality Control Board (RWQCB) has issued guidelines stating that "it is recommended that at least one groundwater sample per site which was positive for MTBE by EPA Method 8020A (or 8021B) be analyzed by EPA method 8240B (or 8260A) to verify the correct identification of MTBE (i.e., split samples from a minimum of one well from each site). We recommend that confirmation analysis be performed for the sample containing the highest MTBE concentration from the site based on Method 8020A (or 8021B) values. For these samples the 8240B (or 8260A) value should be reported." Additionally, per the request of RWQCB, you are required to include the analysis for the following additional oxygenates and lead scavengers in the next round of sampling using Methods 8260 and 8010: Tertiary Amyl Methyl Ether (TAME), Diisopropyl Ether (DIPE), Ethyl Tertiary Butyl Ether (ETBE), Tertiary Butyl Alcohol (TBA), and Ethylene Dibromide (EDB).

According to the December 1989 Well Installation Report, the site's three monitoring wells were

Ms. Tina Berry
Re: 100 MacArthur Blvd.
January 05, 1999
Page 3 of 3

surveyed to an arbitrary benchmark on site. Per RWQCB guidelines, these wells must be surveyed to Mean Sea Level to an accuracy of 0.01 foot.

Per the Oakland Museum's "Creek and Watershed Map of Oakland and Berkeley", there appears to be a stormwater culvert running along MacArthur Boulevard immediately adjacent to the downgradient boundary of the site. Apparently this culvert discharges into Lake Merritt. Please provide information to this office on the details of this culvert, (such as the depth, type of backfill material, diameter of culvert, slope, etc) to assist us in determining whether this culvert could be influencing the migration of the plume.

Currently, the site's wells are on a semi-annual sampling frequency, with the last groundwater sampling event being conducted on June 18, 1998. The next groundwater sampling event should have taken place in December 1998, and a report documenting the work should be submitted within the next month. All future groundwater monitoring reports shall include, among others, the following elements:

- Details and results of all work performed during the designated period of time: records of field observations and data, boring and well construction logs, water level data, chain-of-custody forms, laboratory results for all samples collected and analyzed, tabulations of free product thicknesses and dissolved fractions, etc.
- Status of groundwater contamination characterization
- Interpretations of results: water level contour maps showing gradients, free and dissolved product, plume definition maps for each target component, geologic cross sections, etc.
- Recommendations or plans for additional investigative work or remediation

A workplan addressing the above plume delineation work shall be submitted to this office within 60 days of the date of this letter, (i.e., by March 02, 1999). A report documenting the work shall be submitted to this office within 45 days after completing field activities. If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

Cc: Mr. Scott Hooton, BP Oil Company, Environmental Remediation Management
295 SW 41st Street, Renton, Washington 98055-4931

Leroy Griffin, Oakland Hazardous Materials
505 14th Street, Ste 702, Oakland, CA 94612

Files-JMS

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0# 456

December 19, 1997

Tina Berry
TOSCO
2000 Crow Canyon Place, Suite 400
San Ramon CA 94583

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

RE: BP Oil Facility #11102, 100 MacArthur Blvd., Oakland CA 94610 (Our site #1108)

Dear Ms. Berry:

Recently I assumed case review responsibility for the above referenced site from Jennifer Eberle. I have reviewed reports of groundwater monitoring as well as of tank system monitoring. The tank system monitoring reports do not indicate a leak in the tanks or piping. Nonetheless, groundwater monitoring data show that concentrations of methyl tertiary butyl ether (MTBE) have increased in two wells (MW-1 and MW-2). Also, total petroleum hydrocarbons as gasoline (TPHg) have increased in MW-1 and have fluctuated in MW-2. **This letter serves to notify TOSCO and BP that further investigation is required to determine the source of the increasing MTBE and TPHg in groundwater.**

A number of potential sources exist. The tanks are not known to be outfitted with overfill prevention systems or dispenser pans. Hence, a possible cause of the contamination is past and/or ongoing overfilling of the tanks. Other possible sources or contributing factors are leaks at the dispensers, either below ground or from the surface. Also, piping trenches could be acting as conduits from the tank or dispenser areas.

Please submit a work plan to investigate and correct releases of hydrocarbon contamination at the site. At a minimum, your work plan should include steps you will take to investigate the sources outlined above, as well as other sources you may suspect. Please submit your **work plan to this Office by January 19, 1997**. Groundwater monitoring should continue and **should take place during the first and third quarters of the year, at a minimum.**

As you are aware, certain upgrade requirements must be implemented for this tank system by December 22, 1998 if the station is to continue operation. I advise that TOSCO approach the upgrade work in concert with the investigation of the MTBE sources. Due to environmental contamination concerns and to expected intense competition for qualified contractors and proper 1998 upgrade equipment, I advise you to go forward with this project as soon as possible. Depending upon the scope of work planned for the site, the investigation and source removal should be completed within three to six months of my approval of your workplan.

You may contact me with any questions about this letter at (510)567-5770.

Sincerely,

Pamela J. Evans
Senior Hazardous Materials Specialist

C: Leroy Griffin, Oakland Fire Department
Scott Hooten, BP Oil Company, 295 SW 41st St., Renton WA 98055-4931
William Howell, Alisto Engineering Group, 1575 Treat Blvd, Suite 201, Walnut Creek CA

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

RO#456

October 22, 1996

STID 1108

page 1 of 2

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP)

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

Attn: Scott Hooton
BP Oil Co.
295 SW 41st St., suite N
Renton WA 98055

RE: BP Oil station #11102, 100 MacArthur Blvd., Oakland CA 94610

Dear Mr. Hooton,

Since my last letter, dated 2/23/93, the following documents have been received in this office:

- 1) letter from BP Oil dated 5/18/93, signed by Scott Hooton;
- 2) "Groundwater Monitoring and Sampling Report," prepared by Alisto, dated 8/16/93;
- 3) "Groundwater Monitoring and Sampling Report," prepared by Alisto, dated 1/27/94;
- 4) letter from Tosco Northwest Company, dated 7/12/94;
- 5) "Groundwater Monitoring and Sampling Report," prepared by Alisto, dated 8/18/94;
- 6) "Groundwater Monitoring and Sampling Report," prepared by Alisto, dated 3/10/95;
- 7) "Groundwater Monitoring and Sampling Report," prepared by Alisto, dated 8/2/95; and
- 8) "Groundwater Monitoring and Sampling Report," prepared by Alisto, dated 3/8/96.

It appears that the sampling frequency has been reduced to biannual (twice per year). Since the BTEX concentrations in all wells have decreased to ND for the past two sampling events, this reduction is acceptable. However, standard procedure for biannual sampling is during the first and third quarters. The reason is to accomodate the cyclical hydrological highs and lows. **You are therefore requested to change the sampling schedule from the second and fourth quarters to the first and third quarters.**

If you have any questions, please contact me at 510-567-6700, ext 6761; our fax number is 510-337-9335. **The RWQCB does not need to receive copies of these sampling reports. They have delegated file-keeping responsibilities to the County.**

October 22, 1996
STID 1108
page 2 of 2
Attn: Scott Hooton

Sincerely,



Jennifer Eberle
Hazardous Materials Specialist

cc: Bob Dunn, Tosco Corp., 2130 Professional Dr., Suite 100, Roseville CA 95661
Tim Johnson, Tosco Corp., 601 Union St., Suite 2500, Seattle WA 98101
Attn: Michele Fear, Mobil Oil Corp, 3225 Gallows Rd., Fairfax VA 22037-0001
Brady Nagle, Alisto Engineering, 1575 Treat Blvd., suite 201, Walnut Creek CA 94598
Jennifer Eberle/file

je.1108

SENT OUT ON APRIL 22, 1997 PER JENNIFER EBERLE.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO 456

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

February 23, 1993
STID 1108

Scott Hooton
BP Oil Co.
Environmental Resource Mgmt
16400 Southcenter Parkway, Suite 301
Tukwila WA 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

RE: BP Oil Site #11102
100 MacArthur Blvd.
Oakland CA

Dear Mr. Hooton,

We are in receipt of your letter dated 1/26/93, and the accompanying "Groundwater Monitoring and Sampling Report," prepared by Alisto, dated 1/6/93. As you know, this report documents the sampling and monitoring of three groundwater wells on 11/11/92. The highest concentrations of contaminants are as follows: 260 ppb TPH-g, 92 ppb TPH-d, and 30 ppb benzene (MW1).

Your letter requests case closure, based on the belief that the source of groundwater contamination is upgradient and offsite. We would consider this request valid if there was supporting evidence, which could be in the form of additional investigations along your (onsite) property border, plus identification of the source of contamination. This would avoid drilling on Oakland Ave., which was one of your stated concerns. I would also like to note a discrepancy with paragraph 2 of your 1/26/93 letter. It states that the MCL for benzene was only exceeded once in MW2 and MW3, on 7/30/90. A review of the data indicate that the MCL was exceeded on 7/22/92 (1.3 ppb) and also on 11/11/92 (2.8 ppb), both times in MW2.

Therefore, we regret to deny your request for case closure, until you have determined the source of contamination in a manner that meets the approval of the County. In the meanwhile, you are required to continue quarterly monitoring and sampling of groundwater. This means that the next quarterly event should be scheduled for the first quarter 1993. If you have any questions, please contact me at 510-271-4530.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Eberle".

Jennifer Eberle
Hazardous Materials Specialist

Scott Hooton
STID 1108
February 23, 1993
page 2 of 2

cc: Brady Nagle, Alisto Engineering Group, 1000 Burnett Ave.,
Suite 420, Concord CA
Michele Fear, Mobil Oil Corp., 3225 Gallows Rd., Fairfax VA
22037-0001
Rich Hiatt, RWQCB
Ed Howell/File

je

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0456

Certified Mailer #: P 062 128 214

September 12, 1991

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

Mr. Myong H. Son
BP Oil Co.
100 MacArthur Blvd.
Oakland, CA 94610

SECOND NOTICE OF VIOLATION

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company Facility #11102, 100 MacArthur Blvd.
Oakland, California 94610**

Dear Mr. Son:

On July 22, 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, four underground storage tanks (three single-walled product and one double-walled waste oil) 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 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 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

100 MacArthur Blvd., Oakland
September 12, 1991
Page 2 of 4

- a) Inventory records are currently 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.
- 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.

Submit quarterly summary reports for the previous last two quarters of daily inventory reconciliation.

- 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 are dated March 9, 1990. 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 1988, you are required to submit the following items:
 - a) Correctly completed underground storage tank permit application - Form B.
 - b) Initial tank 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

100 MacArthur Blvd., Oakland
September 12, 1991
Page 3 of 4

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;

- d) With regard to the monitoring requirements for the waste oil tank, you are required to implement one of the following options:
- 1) Install a continuous monitoring probe with an audible/visual detection system.
 - 2) Monitor the annular space daily and maintain records on site for three years.
 - 3) Conduct daily inventory reconciliation similar to that which you conduct for your existing single walled underground storage tanks and maintain records on site.
- e) You are required to provide this office with "As built" drawing indicating underground storage tank and piping specifications. With reference to option #3 (above), please indicate the presence of a striker plate.
- f) 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.

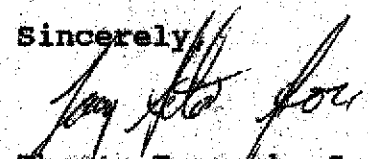
100 MacArthur Blvd., Oakland
September 12, 1991
Page 4 of 4

Submit all of the required materials to this office within 10 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 (\$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 Oliva or myself, at (415) 271-4320.

Sincerely,



Thomas Peacock, Sr. Hazmat Specialist
Hazardous Materials Division

FYF:fyf

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



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

July 25, 1991

Mr. Myong H. Son
BP Oil Co.
100 MacArthur Blvd.
Oakland, CA 94610

NOTICE OF VIOLATION

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company Facility #11102, 100 MacArthur Blvd.
Oakland, California 94610**

Dear Mr. Son:

On July 22, 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, four underground storage tanks (three single-walled product and one double-walled waste oil) 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 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 maintained properly for the three product tanks. Monitoring alternative in Section 2641 which specifies inventory reconciliation shall take into account: separate daily

100 MacArthur Blvd., Oakland
July 25, 1991
Page 3 of 4

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.

- 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.

Submit quarterly summary reports for the previous two quarters of daily inventory reconciliation.

- 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 are dated March 9, 1990. 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 1988, you are required to submit the following items:
- a) Correctly completed underground storage tank permit application - Form B.
 - 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 29, 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;

- d) With regard to the monitoring requirements for the waste oil tank, you are required to implement one of the following options:
 - 1) Install a continuous monitoring probe with an audible / visual detection system.
 - 2) Monitor the annular space daily and maintain records on site for 3 years.
 - 3) Conduct daily inventory reconciliation similar to that which you conduct for your existing underground storage tanks and maintain records on site.
- e) You are required to provide this office with "As built" drawings indicating underground storage tank and piping specifications. With reference to the implementation of option #3 (above), please indicate the presence of a striker plate.
- f) 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 28, 1991. A follow-up inspection will be conducted upon receipt and review of the required

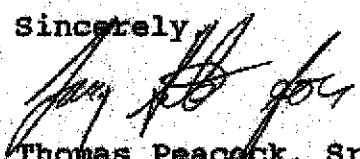
100 MacArthur Blvd., Oakland
July 25, 1991
Page 4 of 4

Submit all of the required materials to this office within 30 days, i.e. no later than August 28, 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,



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
CS

enclosures

Schultz, Robert, Env. Health

From: Leonard_Niles@URSCorp.com
Sent: Thursday, January 27, 2005 12:14 PM
To: Schultz, Robert, Env. Health
Cc: Kyle Christie (E-mail); Robert_Horwath@URSCorp.com
Subject: Re: ro-456 - 100 MacArthur Blvd, Oakland

Bob,

The 5/3 & 7/18/03 ACEH letter references in the workplan are erroneous, they were from a different site workplan used as a template. I apologize for the error. The 7/31/01 letter is the most recent ACEH correspondence we have for this site (other than a teleconference with Don Hwang on 8/12/03); I have no record of receiving an e-mail on 3/19/04. Since we submitted the subsurface investigation workplan for this site (former BP #11102), we have obtained additional information regarding subsurface investigations performed at the adjacent Quickstop (former Tosco) service station at 66/96 MacArthur Boulevard. Numerous offsite borings have been drilled and monitoring wells installed at this site, some of which are directly downgradient of our BP site #11102 along the I-580 right-of-way and under the I-580/Harrison Street overpass. Groundwater hydrocarbon concentrations in those wells and borings immediately downgradient of our site are very low to non-detect. We believe that this data adequately delineates the downgradient extent of the dissolved hydrocarbon plume from the former BP #11102 site, and that no further offsite investigation is necessary. As a result of this recently discovered data, we are planning to submit an addendum to the previous workplan modifying the proposed scope of work to include only four onsite monitoring well installations, to be constructed also as potential extraction wells for future feasibility studies and remediation. One of these wells will replace current MW-1 near the waste oil tank. We will include the Quickstop data in this workplan addendum as justification for eliminating the proposed offsite borings.

We request that you postpone review of the previous workplan until the addendum is submitted, which we anticipate within 60 days. Also, our ACEH site prioritization spreadsheet is being reviewed by our client, we will request submittal to you as soon as possible.

Thank you,

Leonard P. Niles, R.G./C.H.G
Senior Geologist / Project Manager
URS Corporation
1333 Broadway, Suite 800
Oakland, CA 94612
Direct: 510.874.1720
Fax: 510.874.3268

<leonard_niles@urscorp.com>
<chriska@bp.com>
Oakland

"Schultz, Robert,
Env. Health"
<robert.schultz@a
cgov.org>

To: "Leonard Niles (E-mail)"
cc: "Kyle Christie (E-mail)"
Subject: ro-456 - 100 MacArthur Blvd,

01/26/2005 05:34
PM

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0456

October 4, 1989

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

Mr. David M. Noe
Environmental Advisor
Mobil Oil Corp.
3800 W. Alameda Ave., Suite 700
Burbank, CA 91505-4331

RE: Scope of work for former Mobil Oil Corp. service station
10-E6A, 100 MacArthur Blvd., Oakland

Dear Mr. Noe:

The Alameda County Department of Environmental Health, Hazardous Materials Division, has reviewed the work plan for the above site in Oakland. The work plan, providing for the installation of three monitoring wells, is acceptable, and work should proceed immediately. Water levels in the wells will need to be logged on a monthly basis, and samples collected and analyzed on at least a quarterly basis, with regular reports prepared for both this office and the San Francisco Bay Regional Water Quality Control Board.

We will expect the well installation and sampling and analysis report to be submitted to this office within 60 days, i.e., no later than December 4, 1989. If you have any questions about this letter, please contact the undersigned at (415) 271-4320.

Sincerely,

Gil Wistar
Hazardous Materials Specialist

c: Lester Feldman, RWQCB
Bill Hollis, BP Oil Co.
Rafat A. Shahid, Director Env. Hlth.
files



Certified Mailer:P 833 981 504

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

August 4, 1989

Mr. R.J. Edwards
Region Environmental Manager
Mobil Oil Corp.
3800 W. Alameda Ave., Suite 700
Burbank, CA 91505-4331

NOTICE OF VIOLATION

Dear Mr. Edwards:

This notice of violation regards Mobil service station #10-E6A, located at 100 MacArthur Blvd. in Oakland. The Alameda County Department of Environmental Health, Hazardous Materials Division, sent you a letter on November 16, 1988 regarding the removal and replacement of a 550-gallon waste oil tank at this location. In this letter, we requested the following items:

1. An unauthorized release report to be filed immediately, because of the confirmed release from the waste oil tank. This release was substantiated by a hole documented in the tank; by visual oil contamination on the west wall of the excavation; and by stockpile soil sample results of up to 6.5% hydrocarbons.
2. A waste manifest to be submitted documenting the proper disposal of the stockpiled soil as a hazardous waste.
3. The installation of monitoring wells around the waste oil tank to assess the effects, if any, of released oil on groundwater.
4. The results of a precision test on the new waste oil tank before this tank could be placed in service legally. As I'm sure you're aware, this test is required by Div. 20, Chap. 6.7, Sec. 25291(g) of the California Health and Safety Code.

As of the date of this letter, we have received the precision test results on the new tank; however, we have received none of the other items specified above. As a result, Mobil is in violation of Sec. 25299(a)(4) of the H&SC, which specifies penalties for the failure to report an unauthorized release. This section of Code prescribes civil fines of up to \$5,000 for each day the violation continues.

Mr. R. J. Edwards
August 4, 1989
Page 2 of 2

An unauthorized release report must be completed immediately, and sent to this office. Additionally, copies of waste manifests documenting the disposal of contaminated soil and of the old tank must be sent to this office no later than September 3, 1989.

In addition, we have no records of any precision tests on the other three underground tanks at this facility during 1987. Please submit copies of 1987 tank testing results within 30 days, and the 1989 test results as soon as possible after completion of these tests.

As discussed in our November 16 letter, Mobil needs to install monitoring wells around the waste oil tank pit. Three wells must be installed, unless the direction of groundwater flow in the immediate vicinity of the site can be verified to the Division's satisfaction, in which case one well in the downgradient direction would be sufficient. During the drilling of the monitoring wells, soil samples should be collected every five feet down to the water table, beginning at the surface, and analyzed for total oil and grease and TPH-D at a state-certified laboratory. Groundwater samples collected after the wells are properly developed should be analyzed for these same parameters as well as for BTEX. Please submit a report documenting well construction and sampling techniques, as well as analytical results, by **Friday, October 6, 1989.**

If you have any questions about the contents of this letter, please contact Gil Wistar, Hazardous Materials Specialist, at 415/271-4320.

Sincerely,


Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:GW:gw

cc: Tom Callahan, San Francisco Bay RWQCB
Gil Jensen, District Attorney, Alameda County Consumer and
Environmental Protection Division
Doug Krause, DOHS
Myong Hwan Son, owner of business
files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Dept. of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

R0456

November 16, 1988

Telephone Number: (415) 271-4320

R. J. Edwards
Mobil Oil Corporation
3800 West Alameda Ave., Suite 700
Burbank, CA 91505-4331

Dear Mr. Edwards:

This letter is in response to your letter dated November 2, 1988 concerning the Mobil Station located at 100 MacArthur Blvd. in Oakland, CA.

On page 1 of the soil sampling report it said that there were no apparent holes in the tank. In fact there was a hole that was seen by the truck driver and photographed by me. There was also an obvious petroleum odor and petroleum was oozing out of the southwest sidewall of the excavation.

A subsurface investigation is required at all sites having confirmed releases from underground storage tanks containing hazardous substances. Of immediate concern is the possibility of floating product and the potential for migration into underground structures such as basements, utility vaults, sewers, and storm drains. In order to address these concerns, it is necessary to install ground water monitoring well(s) where confirmed releases have occurred. The California Water Quality Control Board, San Francisco Bay Region (RWQCB) "Guidelines for Addressing Fuel Leaks" document should be followed for site investigation and mitigation.

The California Code of Regulations, Title 23, Section 2652 requires all unauthorized releases to be reported. An initial report should be filed within 5 days of detecting a release. An initial report form is enclosed for your use.

A hazardous waste manifest must be submitted to this office as evidence of proper disposal of the contaminated soil.

The new waste oil tank requires a precision test before it is placed into service or permitted. This test is defined in NFPA Pamphlet 329 "Recommended Practice for Handling Underground Leakage of Flammable and Combustible Liquids" and required by the California Health and Safety Code, Division 20, Chapter 6.7, 25291(f).

R. J. Edwards
Mobil Oil Corporation
(100 MacArthur, Oakland)
November 16, 1988

If you have any questions regarding this matter, please contact Thomas Peacock, Senior Hazardous Material Specialist, at (415) 271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief
Hazardous Materials Division

RAS:tfp

cc: Christine Meyers, RWQCB