

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-8577  
(510) 567-6700  
FAX (510) 337-9335

RO0000211

October 25, 2001

Mr. Scott Hooton  
BP Oil  
295 SW 41<sup>st</sup> St, Bldg 13 Ste N  
Renton, CA 98055

Mr. David DeWitt  
Phillips 66  
2000 Crow Canyon Rd  
San Ramon, CA 94583

**RE: Well Decommission at 7197 Village Pkwy, Dublin, CA**

Dear Messrs. Hooton and DeWitt:

This office and the San Francisco RWQCB have reviewed the case closure summary for the above referenced site and concur that no further action related to the underground tank release is required at this time. Before a remedial action completion letter is sent, the onsite monitoring wells (MW-1 through MW-3, AW-4 and Tank Cavity well) should be decommissioned, if they will no longer be monitored. Please notify this office upon completion of well destruction so a closure letter can be issued.

Well destruction permits may be obtained from Alameda County Flood Control and Water Conservation, Zone 7. They can be reached at (925) 484-2600.

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

Sincerely,

eva chu  
Hazardous Materials Specialist

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



06-20-01

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

RO0000211

June 19, 2001

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

Mr. Dave DeWitt  
Tosco  
2000 Crow Canyon Rd  
San Ramon, CA 94583

**SUBJECT: INTENT TO MAKE A DETERMINATION THAT NO FURTHER ACTION IS REQUIRED  
OR ISSUE A CLOSURE LETTER FOR 7197 VILLAGE PKWY, DUBLIN, CA**

Dear Messrs. Hooton and DeWitt:

This letter is to inform you that Alameda County Environmental Protection (LOP) intends to make a determination that no further action is required at the above site or to issue a closure letter. Please notify this agency of any input and recommendations you may have on these proposed actions within 20 days of the date of this letter.

In accordance with section 25297.15 of Ch. 6.7 of the Health & Safety Code, you must provide certification to the local agency that all of the current record fee title owners have been informed of the proposed action. Please provide this certification to this office within 20 days of the date of this letter.

If you have any questions about these proposed actions, please contact me at (510) 567-6762.

Sincerely,

A handwritten signature in black ink, appearing to read 'eva chu', written in a cursive style.

eva chu  
Hazardous Materials Specialist

c: Chuck Headlee, RWQCB  
William McCammon, Alameda County Fire Dept, QIC Code 41401

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



12-5-00

PO211

StID 2043

December 4, 2000

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

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

**RE: MTBE Plume Delineation at 7197 Village Parkway, Dublin, CA**

Dear Mr. Hooton:

In July 1998, the underground storage tanks (USTs) and associated piping and dispensers at the former BP station #11116, located at the above referenced address, were removed. Hydrocarbon impacted soil was removed to the extent practical. Confirmation soil samples contained low to moderate levels of petroleum hydrocarbons. Moderate levels of contaminants remain mostly in the vicinity of sample S-6 (540ppm TPHg, and 1.8, 0.96, 8.7 and 23.6ppm BTEX, respectively).

Between July 31 and August 27, 1998, approximately 28,200 gallons of groundwater in the tank excavation was removed. A grab groundwater sample (W-1) collected from the tank pit in August 2, 1998 contained 4,400ppb MTBE. Before the pit was filled, an extraction well was installed in the northwest corner of the excavation, to facilitate groundwater extraction, if deemed necessary, in the future. The tank cavity well was sampled in November 1999. At that time, groundwater contained 1,500ppb MTBE (EPA Method 8260).

On a couple of occasions after the USTs were removed, you requested that no further action and case closure be granted for the site. As you are aware, the SF-RWQCB does not approve of case closure if sites contain elevated MTBE, as is the case with this site. At this time, the extent of the MTBE plume must be delineated. And groundwater sampling of the tank cavity well should continue on an annual basis until further notice. To delineate the MTBE plume, you may sample the Shell wells (MW-5, MW-7, and MW-11). The next sampling event should be conducted no later than January 2001.

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

eva chu  
Hazardous Materials Specialist

bp11116-1

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0211  
RAFAT A. SHAHID, DIRECTOR

September 28, 1995

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

Mr. Darryl Green  
TOSCO Representative  
206 Lone Oak Drive  
Vacaville, CA 95688

**Subject: Site visit at BP Station #11116, 7197 Village Parkway,  
Dublin, CA 94568**

Dear Mr. Green:

This letter is intended to memorialize our telephone conversation of this evening. The purpose of my visit today was for review of the site management related to the underground storage tanks and the Hazardous Materials Business Plan (HMBP).

Upon arriving at the station I introduced myself to the operator. We talked about the training he was given in order to deal with emergencies. He described telephone notification of the station owner's and 911. I asked the operator to demonstrate the Veeder-Root TLS250 functions and provide a printout of the current status of the tank system. He told me that he only knew how to print out the daily inventory. In fact he said that he was afraid to touch the machine because he might damage something in the system. I explained to him that it was very important that he be trained in the operation of the leak detection monitor and be able to demonstrate the functions. His lack of training and ability to use the leak detection system concerns me because if a release of product occurred he would be unable to act swiftly.

The HMBP is **not** on site and the file copy is **not** current. The plan was requested during a site visit last year. I will follow-up with Ms. Chun in Seattle.

To summarize, my visit did not instill me with confidence that the site is being managed properly.

Sincerely,

Robert Weston  
Senior Hazardous Materials Specialist

c: Bill Reynolds, East Team Manager, ACDEH  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0211

June 26, 1995

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

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

**RE: BP Service Stations in Alameda County**

Dear Mr. Hooton:

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

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

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

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

eva chu  
Hazardous Materials Specialist

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0211

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 2043

March 10, 1994

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

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

**Subject: Groundwater Assessment Adjacent to AW-6 at BP #11116,  
7197 Village Parkway, Dublin, CA 94568**

Dear Mr. Hooton:

I have completed review of Alisto's January 1994 Groundwater Monitoring and Sampling Report for the above referenced site. Water samples collected from monitoring well AW-6 in November 1993 show a substantial increase in the level of TPH-G and benzene, as compared to the previous quarter.

In a recent meeting (January 1994) with BP Oil, Alameda County District Attorney's Office (Michael O-Conner) and this agency (Scott Seery), it was determined that further assessment of the source and extent of water contamination next to monitoring well AW-6 is necessary. A workplan for this investigation is due within 45 days of the date of this letter, or by April 29, 1994.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

eva chu  
Hazardous Materials Specialist

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

bpdublin.6

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0211

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 2043

September 23, 1993

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

**Subject: Groundwater Contamination at Monitoring Well AW-6, 7197  
Village Parkway, Dublin 94568**

Dear Mr. Hooton:

I have completed review of Alisto's July 26, 1993 Groundwater Monitoring and Sampling Report and your letter of July 1, 1993 for the above referenced site. Groundwater elevations measured during the May 1993 monitoring episode show the water level in monitoring well AW-6 to be at 7.64 feet. And as expected, fuel constituents detected in this well was as high as 7,900 ppb TPH-G and 900 ppb benzene. The source of fuel contamination in this well has not been determined.

Since documentation of the removal of the former Mobil underground storage tanks from this site is lacking, it cannot be ruled out that this contamination was not due to an on-site source. Under these circumstances, BP Oil should conduct investigations to determine the source of this contamination, and the preferential pathways which may cause the contamination to migrate off-site in the downgradient direction. Upon review of the monitoring well logs, AW-5 and AW-6 do not appear to be screened in the same aquifer, therefore, it cannot be said that AW-5 is downgradient from AW-6.

Please submit to this office within 30 days of the date of this letter a proposal for the required investigation. The information gathered by the investigation will be used to determine an appropriate course of action to remediate the site, if deemed necessary.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by either this agency.

Mr. Scott Hooton  
BP Oil  
re: 7197 Village Pkwy, Dublin  
September 23, 1993

Page 2

Should you have any questions about the content of this letter,  
please contact me at (510) 271-4530.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

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

bpdublin.5



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0211

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 2043

July 19, 1993

Mr. Joe Abel  
Mobil Oil  
3225 Gallows Rd., Room 1W401  
Fairfax, VA 22037

**Subject: Closure Report for Former Mobil Station 10 KNK at  
7197 Village Parkway, Dublin CA 94568**

Dear Mr. Abel:

This office is overseeing site cleanup due to leaking underground storage tanks (USTs) for the County of Alameda. The above referenced site has soil and groundwater contamination as a result of former leaking USTs. We are not in receipt of all site assessment reports, including the tank closure report for USTs removed in 1983 from this site. As these reports will help to further characterize the site, we are requesting that copies of all such reports, of work performed prior to 1989, be sent to this office within 30 days of the date of this letter.

We appreciate your cooperation in handling this matter. If you have any questions, please contact me at (510) 271-4530.

Sincerely,

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

eva chu  
Hazardous Materials Specialist

cc: files

bpdublin.4

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0211

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 2043

June 8, 1993

Mr. Scott Hooton  
BP Oil  
16400 Southcenter Pkwy, 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

**Subject: Additional Groundwater Investigation at BP Service  
Station No. 1116, 7197 Village Parkway, Dublin, CA  
94568**

Dear Mr. Hooton:

I have completed review of Alisto's Groundwater Monitoring and Sampling Report, dated April 27, 1993, for the above referenced site. This report documents groundwater sampling activities performed on February 10, 1993. Analysis of water from monitoring well AW-6 exhibited 14,000 ppb TPH-G and 610 ppb benzene. This well continues to exhibit anomalous results, where contaminant levels vary in great magnitudes from one quarter to the next.

At this time, additional investigation is required to determine the source of contamination and any preferential pathways which may contribute to its transport on- and/or off-site. As noted in Alton Geoscience's Site Investigation Report, dated January 1991, "The stratigraphy encountered in boring AW-6 was silty to poorly graded sand at a depth of four feet below grade, which continued to a depth of 15.5' below grade. This shallow, permeable zone, which may represent a buried stream channel deposit..." Please submit to this office within 45 days of the date of this letter a workplan documenting work intended for this investigation.

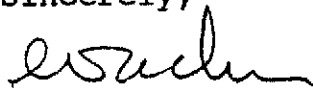
Groundwater monitoring of wells MW-1, MW-2, and MW-3 should continue as specified in my letter of March 3, 1993, however, analysis for chlorinated hydrocarbons may be discontinued. Future quarterly monitoring reports should be submitted in a more timely manner, 45 days after completion of field activities is acceptable.

Our files show the existing underground storage tanks (USTs) were installed in 1983. However, we are not in receipt of a final tank closure report of any former fuel USTs removed. Please provide such reports to this office within 30 days of the date of this letter.

Scott Hooton  
BP Oil, 7197 Village Parkway  
June 8, 1993

If you have any questions or comments, I can be reached at the above number.

Sincerely,



eva chu  
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB  
Brady Nagle, Alisto, 1777 Oakland Rd., Suite 301,  
Walnut Creek, CA 94596  
Tom Hathcox, Dougherty Regional Fire Authority  
files

BPDublin.3

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0211

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 2043

March 3, 1993

Scott Hooton  
BP Oil  
16400 Southcenter Pkwy, Suite 301  
Tukwila, WA 98188

**Subject: Groundwater Monitoring at BP Oil Site No. 11116,  
7197 Village Parkway, Dublin CA 94568**

Dear Mr. Hooton:

This office has received the January 27, 1993 Groundwater Monitoring and Sampling Report and your request to decrease sampling from a quarterly to a semi-annual basis all monitoring wells except AW-6, which will continue to be sampled quarterly.

After reviewing the case file for the above referenced site, the sampling frequency can be changed as follows:

1. Sample on a quarterly basis monitoring wells MW-3, AW-5, and AW-6
2. Sample on a semi-annual basis monitoring wells MW-1, MW-2, and AW-4.

This new sampling schedule can begin as soon as possible and continue until further notice. If you have any questions or comments about the content of this letter, I may be contacted at (510) 271-4530.

Sincerely,

Eva Chu  
Hazardous Materials Specialist

cc: Rich Hiett, RWQCB  
Brady Nagle, Alisto, 1777 Oakland Blvd., Walnut Cr., 94596  
Edgar Howell/files

BPDublin.2

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



R0211

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

StID 2043

DEPARTMENT OF ENVIRONMENTAL HEALTH

State Water Resources Control Board

Division of Clean Water Programs

UST Local Oversight Program

80 Swan Way, Rm 200

Oakland, CA 94621

(510) 271-4530

October 30, 1992

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

**Subject: Ground Water Contamination at BP Station #11116,  
7197 Village Parkway, Dublin, 94568**

Dear Mr. Hooton:

This office has reviewed the file for the above referenced site. When a waste oil underground storage tank (UST) was removed in December 1988 soil analyses confirmed an unauthorized release of petroleum hydrocarbons have occurred at this site. The pit was overexcavated until soil analysis exhibited 6 ppm oil and grease. Three monitoring wells were installed around the waste oil UST pit in August 1989. Water samples exhibited up to 140 ppb TPH-D, 110 ppb TPH-G and 8,100 ppb TOG.

In October 1990 additional subsurface investigation began with the advancement of three additional soil borings for the installation of monitoring wells AW-4, 5 and 6. A qualitative shallow ground water survey was also conducted with the installation of 8 temporary wells to collect ground water samples.

Ground water sampling data collected since October 1990 show AW-6 to detect TPH-G and benzene at concentrations which vary by orders-of-magnitude with the fluctuation of water levels (see data from February 1992 where depth to water was at 8 feet). Although it is unclear as to the source of this contamination, such water level fluctuations and subsequent increases or decreases in dissolved contaminant concentrations are suggestive of latent soil contamination at and above the capillary fringe.

You are directed at this time to review your inventory record for any discrepancies for the past 5 years, and any records which document repairs to tank/piping, and of any fuel leak cleanup. Please submit a summary of your findings. Further, product line and tank tightness test certificates from the past 5 years should also be sent to this office for review. Both are to be submitted **within 15 days of the date of this letter.**

Continue with the quarterly ground water monitoring schedule. Substantial increases in concentration of TPH-G or benzene contamination will require additional investigation on- and offsite. Efforts should be made to continue concurrent monitoring of wells with the neighboring UNOCAL, former Shell,

Scott Hooton  
7197 Village Pkway, Dublin  
October 30, 1992

Page 2

and ARCO service stations. All sites should be using a common benchmark to determine ground water elevation.

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. Copies of all proposals and reports must also be sent to Mr. Richard Hiatt of the RWQCB.

Should you have any questions about the content of this letter, please contact me at (510) 271-4530.

Sincerely,



Eva Chu  
Hazardous Materials Specialist

cc: Rich Hiatt, RWQCB  
Gil Jensen, Alameda County District Attorney's Office  
Tom Hathcox, Dougherty Regional Fire Authority  
Brady Nagle, Alisto, 1000 Burnett Ave., Suite 420, Concord  
Edgar Howell/files

BPdublin

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Room

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

September 13, 1991

BP Oil Co.  
7197 Village Pkwy.  
Dublin, CA 94568  
Attn: Kulbhushan Gill

**SECOND NOTICE OF VIOLATION**

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks at BP Oil Company, Facility #11116, 7197 Village Parkway, Dublin, California 94568**

Dear Mr. Gill:

On July 30, 1991, Maria Mendoza from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

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

- 1) Section 2635(b)(6) & (7), CCR and Section 25289(b) 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 Veeder Root TLE 250 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. Veeder Root TLE 350, etc.) monitor for leaks - whether probes are installed in the interstitial space of tank(s), piping, sumps, island trench, etc.;
2. Description of training needed for operators and BP Maintenance employees or contractors for the routine operation and maintenance of both the tank system and the monitoring equipment(s);
3. Reporting format.

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

7197 Village Pkwy., Dublin  
September 13, 1991  
Page 4 of 7

- 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(a)(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(a)(2), Title 23, CCR - The spill/leak response plan should demonstrate that any unauthorized release will be removed from the secondary containment system within

7197 Village Pkwy., Dublin  
September 13, 1991  
Page 5 of 7

the time consistent with the ability of the secondary containment system to contain the hazardous substance, but not more than 30 calendar days. The response plan shall include, but is not limited to, the following:

- a) A description of the proposed methods and equipment(s) to be used for removing and properly disposing of any hazardous substances, including the location and availability of the required equipment(s) if not permanently on-site, and an equipment maintenance schedule for the equipment located on-site;
- b) The name(s) and title(s) of the person(s) responsible for authorizing any work necessary under the response plan.

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

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

- 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;

7197 Village Pkwy., Dublin  
September 13, 1991  
Page 6 of 7

- c) The depth from the bottom of the leak interception and detection system to the highest anticipated level of groundwater;
- d) The nature of the unsaturated soils under the leak interception and detection system and their ability to absorb contaminants or to allow movement of contaminants; and
- e) The methods and scheduling for removing all of the hazardous substances which may have been discharged from the primary container and are located in the unsaturated soils between the primary container and ground water, including the leak interception and detection system sump.

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

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

- 3) Section 2635, Title 23, CCR - 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, overflow basins, etc.;
  - b) Materials used for tank and piping (i.e. brands, single or double-walled, steel or PVC, etc.)

7197 Village Pkwy., Dublin  
September 13, 1991  
Page 7 of 7

- c) Locations and type of equipment used for continuous leak detection. Include types of probes and probe positions.
- 4) For the double-walled waste oil tank which was installed in 1985, in addition to the requirements mentioned above, you are required to perform the following action:
  - a) Install a continuous electronic leak detection system with audio and visual alarms for the interstitial space.

Please note that copies of the documents requested above (except item #3) 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.

MAM:mam

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



R0211

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

August 5, 1991

BP Oil Co.  
7197 Village Pkwy.  
Dublin, CA 94568  
Attn: Kulbhushan Gill

**NOTICE OF VIOLATION**

SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks  
at BP Oil Company, Facility #11116, 7197 Village Parkway,  
Dublin, California 94568

Dear Mr. Gill:

On July 30, 1991, Maria Mendoza from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

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

- 1) Section 2635(b)(6) & (7), CCR and Section 25289(b) 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) Section 2632(d)(1) or 2634(d)(2), CCR - A site specific written routine monitoring plan/procedure has not been submitted to this office. You are required to submit this plan to our agency. This plan 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) and title(s) of the person(s) responsible for monitoring/ maintaining the equipment, and the reporting format.

7197 Village Pkwy., Dublin  
August 5, 1991  
Page 2 of 3

Please be advised that the written monitoring plan should include calibration and/or maintenance schedule for the monitoring equipment(s), e.g. continuous electronic leak detection system, automatic line leak detector, etc. The maintenance schedule shall be in accordance with the manufacturer's instructions. Also, as part of the monitoring plan, please include a description of training needed for the operation of the monitoring equipment(s).

- 3) Section 2632(d)(2), Title 23, CCR - This office has not received a site specific written spill/leak response plan. Per the above section, you are required to submit this plan to our office. The written spill/leak response 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:
  - a) A description of the proposed methods and equipment to be used for removing the gasoline or 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.
  - b) The name(s) or title(s) of the person(s) responsible for authorizing the work to be performed.
  
- 4) Section 2635, Title 23, CCR - 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, overflow 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.

7197 Village Pkwy., Dublin  
August 5, 1991  
Page 3 of 3

- 5) For the double-walled waste oil tank which was installed in 1985, in addition to the requirements mentioned above, you are required to perform the following actions:
  - a) Install a continuous electronic leak detection system with audio and visual alarms for the interstitial space, OR
  - b) Perform daily manual monitoring of the interstitial space. Please be advised that a strike plate should be located directly under the monitoring opening in order to protect "sticking" the interstitial space of the waste oil tank.

Please note that copies of the documents requested above (except item #4) 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 August 16, 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 the Health and Safety Code.

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

Sincerely,

*R. Arulanantham*  
 Ravi Arulanantham, Hazmat Specialist  
 Hazardous Materials Division

MAN:mam

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



ALAMEDA COUNTY  
HEALTH CARE SERVICE

AGENCY

DAVID J. KEARS, Agency Director



November 27, 1989

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

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Fifth Floor  
Oakland, CA 94621  
(415) 763-2000

Re: Preliminary groundwater investigation at former Mobil  
station #10-KNK (BP #11116), 7197 Village Pkwy., Dublin

Dear Mr. Noe:

The Alameda County Department of Environmental Health, Hazardous Materials Division, has reviewed the consultant's report prepared for the above site. (Even though this service station is now operated by BP Corp., Mobil retains the responsibility for identifying and correcting pre-existing contamination at this site.) The report indicates that three monitoring wells were installed around the former waste oil tank pit. Soil samples collected during their drilling showed TOG levels of up to 4,000 ppm, and in one case, TPH as diesel. Soil samples were collected from depths of 5, 10, and about 13 feet, but the 5-foot samples were not analyzed. Water samples indicated the presence of dissolved TOG, diesel, and gasoline, at levels of up to 140 ppb.

With respect to groundwater levels, the calculated gradient was towards the northwest. According to Zone 7 of the Alameda County Flood Control and Water Conservation District, the general flow of groundwater in this area is in just the opposite direction, i.e., towards the southeast. Therefore, monitoring well MW-2 would be considered directly downgradient if the measured September 1989 water levels are anomalous and flow is in fact to the southeast. However, if water does flow northwest at this site, another monitoring well must be installed to ensure that groundwater conditions directly downgradient of the former tank pit can be monitored. To this end, we are requiring groundwater levels to be measured on a monthly basis at the site; if data from the next two months' measurements confirm the northwest groundwater flow, Mobil must at that point install another well. Otherwise, monthly water level measurements and quarterly sampling and analysis must be conducted at the site.

Another unexpected result of the preliminary investigation was the 110 ppb of TPH-G found in the water sample from monitoring well MW-3. Further investigation is needed to determine the source of this gasoline, which did not turn up in any of the other water or soil samples analyzed. This result suggests that there may be a source of gasoline from someplace other than the former waste oil tank pit.

Mr. David Noe  
November 27, 1989  
Page 2 of 2

The soil sample results show levels of hydrocarbons above hazardous waste thresholds. Additional unsaturated zone sampling must take place so that the plume of soil contaminated above 1,000 ppm can be defined. This should include analysis of the 5-foot samples currently on hold (from the drilling of the monitoring wells), as well as further borings around the former pit. Remediation will be required for all soil with hydrocarbon contamination above 1,000 ppm.

A report documenting the results of these additional site activities and outlining remedial recommendations is due in this office and to the San Francisco Bay Regional Water Quality Control Board (RWQCB) no later than January 15, 1990. The RWQCB is unable to manage the large number of fuel leak remediation cases within Alameda County, and has therefore delegated this responsibility to our office. Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, according to Sec. 13267(b) of the California Water Code. Failure to respond fully or in a timely manner to this request could result in civil liabilities under the Water Code of up to \$5,000 per day. Other violations of California law may also be cited.

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,

*Gilbert M. Wistar*

Gil Wistar  
Hazardous Materials Specialist

cc: Bill Hollis, BP Oil Co.  
Lester Feldman, RWQCB  
Rafat A. Shahid, Asst. Agency Director, Environmental Health  
files



Certified Mailer: P 833 981 505

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

August 11, 1989

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

**NOTICE OF VIOLATION**

Dear Mr. Noe:

This notice of violation regards former Mobil service station #10-KNK, located at 7197 Village Pkwy. in Dublin. According to Bill Hollis of BP Oil, this is one of the new BP stations for which Mobil retains responsibility for pre-existing environmental monitoring and remediation requirements. The Alameda County Department of Environmental Health, Hazardous Materials Division, sent you letters on April 24 and May 3, 1989 regarding the removal and replacement of a 280-gallon waste oil tank at this location. In these letters, we requested the following items:

1. Waste manifests documenting the proper disposal of the removed 280-gallon tank, as well as disposal of contaminated soil from overexcavation (exclusive of soil from stockpiles "A" and "B," which was permitted to go to a Class III landfill).
2. The installation of monitoring wells around the waste oil tank to assess the effects, if any, of released oil on groundwater.
3. A deposit of \$330 made payable to Alameda County to cover additional county costs for overseeing this project.

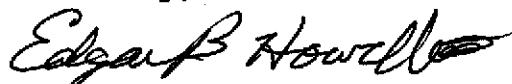
As of the date of this letter, this office has received no communication from Mobil regarding these items. As a result, Mobil is in violation of Sec. 25298 of the California Health and Safety Code, which states that underground storage tank closure is incomplete until the responsible party characterizes and remediates the contamination resulting from product discharge. Sec. 25299 specifies civil penalties of up to \$5,000 for each day of violation.

Mr. D. M. Noe  
August 11, 1989  
Page 2 of 2

Please send to this office a deposit of \$330 as soon as possible. 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 11, 1989. Additionally, as discussed, 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 13, 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* Rafat A. Shahid, Chief  
Hazardous Materials Division

RAS:GW:gw

cc: Lester Feldman, San Francisco Bay RWQCB  
Gil Jensen, District Attorney, Alameda County Consumer and  
Environmental Protection Division  
Doug Krause, DOHS  
Tom Hathcox, Dougherty Regional Fire District  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0211

Certified Mailer # P 833 981 387

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415) 271-4320

3 May 1989

David Noe  
Environmental Adviser  
Mobil Oil Corporation  
3800 West Alameda Avenue, Suite 700  
Burbank, Ca. 91505-4331

Subject: Underground Storage Tank Removal at 7197 Village Parkway,  
Dublin, Project #U524538.

Dear Mr. Noe:

A review of our records indicates that the balance of the deposit submitted in regards to the underground storage tank removal conducted at the above location is insufficient to cover remaining costs anticipated for this project. Please submit to our office a check made payable to the County of Alameda for \$330.00.

This deposit is authorized by Section 3-141.6 of the Ordinance Code of the County of Alameda and is used to cover expenses incurred by Alameda County personnel in the discharge of their oversight duties associated with this project. Records are maintained of the time County employees commit to a project and the deposit is charged at an hourly rate. Upon the completion of the project the balance of the deposit will be returned to you.

In accordance with Section 3-141.6(a) of the Ordinance Code of the County of Alameda, we request that this additional deposit be paid within ten days of the date upon which you receive this notification. Failure to meet this deadline could void all prior approval and render any further construction or activity at this site unlawful.

If you have any questions concerning this matter, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rafat A. Shahid".

Rafat A. Shahid, Chief,  
Hazardous Materials Division

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0211

24 April, 1989

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Program  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(415) 271-4320

David Noe  
Environmental Advisor  
Mobil Oil Corporation  
3800 West Alameda Avenue  
Suite 700  
Burbank, Ca. 91505-4331

Subject: Underground Storage Tank Removal at Station # 10-KNK, 7197  
Village Parkway, Dublin.

Dear Mr. Noe:

Thank you for the analytical report prepared by Kaprealian Engineering in regards to the tank removal conducted at the above location. Following a review of the report, the Alameda County Department of Environmental Health, Hazardous Materials Division, concurs with the proposed actions articulated in the Kaprealian report of 11 January, 1989.

- 1) The excavations conducted at this site have been sufficiently thorough.
- 2) The soil stockpile represented by composite samples "A" and "B" can be disposed of as a nonhazardous waste. The remaining stockpile, however, must be manifested for disposal or be subjected to further analysis to document it's level of hydrocarbon contamination.
- 3) Guidelines established by the San Francisco Bay Regional Water Quality Control Board require that a groundwater monitoring well be installed whenever soil contamination of up to 100 parts per million is discovered in regards to an underground storage tank. This well is to be situated within ten feet of the former tank location and oriented downgradient relative to groundwater flow direction. The guidelines specify that the data from three wells must be used to determine groundwater flow direction. This installation is to be directed by a registered engineer/geologist and all boring logs and analytical data must be submitted to this office for review.

David Noe  
Mobil Oil Corporation  
3800 West Alameda Avenue  
Suite 700  
Burbank, Ca. 91505-4331  
24 April, 1989  
Page 2 of 2.

4) Please submit a copy of the hazardous waste manifest for the tank so that we may include it in our records.

If you have any questions or require further clarification concerning the actions which need to be taken in regards to this matter, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,

*Rafat A. Shahid*

Rafat A. Shahid, Chief,  
Hazardous Materials Division

RAS:DB

cc: Dyan Whyte, SFBRWQCB  
Gary Johnson, Kaprealian Engineering, Inc.  
P.O. Box 913  
Benicia, Ca. 94510

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Director



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

R0211

Telephone Number: (415) 271-4320

12 December, 1988

Gary Johnson  
Kaprealian Engineering, Inc.  
P.O. Box 913  
Benicia, Ca. 94510

Subject: Underground Tank Removal at 7197 Village Parkway, Dublin

Dear Mr. Johnson:

Thank you for the telephone report concerning the soil analysis data measured at the underground storage tank removal project at 7197 Village Parkway in Dublin. Please submit a copy of the data and a Chain of Custody Form to our office so that we can include them in our files.

Your client intends to install a new tank within this same excavation at the earliest opportunity. It is the opinion of the Alameda County Department of Environmental Health, Hazardous Materials Division that a cautious approach may, in the long run, lead to a more successful completion of the project.

Total Oil and Grease readings of up to 110 parts per million were measured in the excavation to a depth of eighteen feet. This datum coupled with the observation of holes in the tank upon examination lead to the conclusion that a leak may have occurred. Further soil analysis is pending, from samples collected in closer proximity to the tank. Contamination readings at least as high as that already reported can be anticipated. It may be prudent to attempt additional soil excavation before installing the new tank.

We recommend that the excavation be extended in all directions to a depth lower than that of the tank. This action may serve to remove all contaminated soil and determine if, and in what direction, a contamination plume may be present. Additional soil samples will verify the success of this process. Include this removed soil with that which was stockpiled from the original excavation for proper disposal at a later date. Installing the new tank without this additional excavation may lead to further delay in project completion due to remediation measures which may be required.



Gary Johnson  
Kaprealian Engineering, Inc.  
P.O. Box 913  
Benicia, Ca. 94510  
Dublin Tank Removal  
Page 2 of 2

An Unauthorized Release Report was left with Mr. Broderick, the owner of the station for completion and submittal to our office as required by law. Please inform your client that guidelines established by the San Francisco Bay Regional Water Quality Control Board specify that a monitoring well must be sunk within ten feet of the location of the underground storage tank whenever soil contamination levels reaching 100 parts per million are encountered. This well is to be located in a downgradient direction relative to ground water flow, and must be sunk to a depth of fifteen feet below ground water depth. The data from three wells must be used to identify ground water flow direction. During installation, soil samples must be collected at five foot depth intervals for laboratory analysis. This operation must be supervised by a registered engineer/geologist and boring logs and all derived data must be submitted to our office for review.

If you have any questions or require further clarification concerning the mitigation measures needed to address this underground tank removal project, please contact, Dennis Byrne, Hazardous Materials Specialist, at (415) 271-4320.

Sincerely,



Rafat A. Shahid, Chief,  
Hazardous Materials Division

RAS:DB

cc: Lisa McCann, RWQCB