



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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May 18, 2015

Western Dealer Holding Company LLC  
DBA Platinum Energy  
30343 Canwood St., Ste 200  
Agoura Hills, CA 91301-4329  
Attn.: Shane Nolan  
(Sent via E-mail to: [snolan@platinum-energy.net](mailto:snolan@platinum-energy.net))

Phillips 66  
76 Broadway  
Sacramento, CA 95818  
Attn.: Ed Ralston  
(Sent via E-mail to: [Ed.C.Ralston@p66.com](mailto:Ed.C.Ralston@p66.com))

Charanjeer Kaur and Kulwant Minhas  
PO Box 3545  
Yuba City, CA 95992-3545

Sam and Wendy Ng  
3220 Lakeshore Avenue  
Oakland, CA 94610

Subject: Add Responsible Party, Fuel Leak Case No. RO0000229 and Geotracker Global ID T0600101463, UNOCAL #5325, 3220 Lakeshore Avenue, Oakland CA 94610

Dear Responsible Parties:

In an earlier Notice of Responsibilities (NORs), Union Oil Company of California, ConocoPhillips, Western Dealer Holding Company LLC, and Charanjeer Kaur and Kulwant Minhas were notified that the above referenced site had been placed in the Local Oversight Program and that they had been named as Responsible Parties for the fuel leak case. An additional party has been named as Responsible Party for the fuel leak case in the attached updated NOR, as defined under 23 C.C.R Sec. 2720. Please see Attachment A – Responsible Parties Data Sheet, which identifies all Responsible Parties and provides background on the unauthorized release and Responsible Party Identification.

If your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Should you have any questions, please contact me at (510) 567- 6764 or send me an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Sincerely,

Keith Nowell, PG, CHG  
Hazardous Materials Specialist

Enclosures: Attachment A – Responsible Parties Data Sheet

cc: Dilan Roe, ACEH, (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Keith Nowell, ACEH, (sent via electronic mail to [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org))  
Geotracker, Electronic File

ALAMEDA COUNTY ENVIRONMENTAL HEALTH  
LUFT LOCAL OVERSIGHT PROGRAM

ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET

May 18, 2015

Site Name & Address:

**UNOCAL #5325  
3220 LAKESHORE AVE.  
OAKLAND, CA 94610**

**Local ID: RO0000229  
Related ID: 1059  
RWQCB ID: 01-1588  
Global ID: T0600101463**

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**All Responsible Parties**

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**RP has been named a Primary RP - UNION OIL COMPANY OF CALIFORNIA  
c/o UNOCAL 76 PROP TAX  
PO BOX 7600 | LOS ANGELES, CA 90051 | No Phone Number Listed**

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**RP has been named a Primary RP - PHILLIPS 66  
ATTN: ED RALSTON  
76 BROADWAY | SACRAMENTO, CA 95818 | (916) 558-7633**

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**RP has been named a Primary RP - WESTERN DEALER HOLDING CO LLC  
ATTN.: SHANE NOLAN  
DBA PLATINUM ENERGY  
30343 CANWOOD ST., SUITE 200 | AGOURA HILLS, CA 91301 | (818) 206-5704**

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**RP has been named a Primary RP - CHARANJEER KAUR & KULWANT MINHAS  
PO BOX 3545 | YUBA CITY, CA 95992-3545 | No Phone Number Listed**

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**RP has been named a Primary RP - NG SAM S & WENDY W  
3220 LAKESHORE AVE. | OAKLAND, CA 94610 | (510) 836-9888**

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## ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET (Continued)

May 18, 2015

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### **Responsible Party Identification Background**

Alameda County Environmental Health (ACEH) names a "Responsible Party," as defined under 23 C.C.R Sec. 2720. Section 2720 defines a responsible party 4 ways. An RP can be:

1. "Any person who owns or operates an underground storage tank used for the storage of any hazardous substance."
  2. "In the case of any underground storage tank no longer in use, any person who owned or operated the underground storage tank immediately before the discontinuation of its use."
  3. "Any owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred."
  4. "Any person who had or has control over an underground storage tank at the time of or following an unauthorized release of a hazardous substance."
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## ATTACHMENT A - RESPONSIBLE PARTIES DATA SHEET (Continued)

May 18, 2015

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### **Existence of Unauthorized Release**

An active service station operates at the subject property located at 3220 (aka 3200) Lakeshore Avenue in Oakland, CA. In 1990 three soil borings were advanced adjacent to two 10,000-gallon and one 550-gallon underground storage tanks (USTs) at the property. Soil sample analyses revealed the presence of up to 7,500 milligrams per kilogram (mg/Kg) total petroleum hydrocarbons as gasoline (TPH-g) and 13 mg/kg benzene. These concentrations indicate an unauthorized release has occurred from the underground storage tank system at this site.

### **Responsible Party Identification**

Union Oil Company of California (Union Oil) acquired title of the property in September 1988. On July 13, 1992, Union Oil was notified that the above referenced site had been placed in the Local Oversight Program and that Union Oil Company of California was identified as a Responsible Party for the fuel leak case as it met Definition 1 as business owner and tank operator, Definition 3 as property owner, and Definition 4 as having control of a UST at the time or following a release.

Through a series of mergers, acquisitions, and spin offs, Union Oil divested certain refining and marketing assets to Tosco (including the Union 76 brand), which was acquired by Phillips Petroleum. Phillips Petroleum merged with Conoco to form ConocoPhillips and most recently spun-off Phillips 66 Company. On August 29, 2012, ConocoPhillips was notified that it met the definition of a Responsible Party, having met Definition 1, as a person who owns or operates an underground storage tank used for the storage of any hazardous substance as owned the property where an unauthorized release occurred, and Definition 3, as owner of property where an unauthorized release of a hazardous substance from an underground storage tank has occurred. Phillips 66 Company, as a successor to ConocoPhillips, meets the definition of a responsible party for the site because it owned or operated underground storage tanks used for the storage of any hazardous substance (Definition 1) and owned the property where an unauthorized release occurred (Definition 3).

On August 29, 2012, Western Dealer Holding Company LLC, dba Platinum Energy, was notified that it met the definition of a Responsible Party having acquired the property in July 2010. Western Dealer Holding Company LLC, dba Platinum Energy, acquired the property in July 2010. Western Dealer Holding Company LLC meets the definition of a responsible party for the site because it owned the property where an unauthorized release occurred (Definition 3).

Charanjeer Kaur and Kulwant Minhas acquired the property in May 2011. On August 29, 2012, Charanjeer Kaur and Kulwant Minhas were notified that they met the definition of a responsible party for the site because they owned the property where an unauthorized release occurred (Definition 3).

Sam S. and Wendy W. Ng acquired the property in February 2015. Sam S. and Wendy W. Ng meet the definition of a responsible party for the site because they owned the property where an unauthorized release occurred (Definition 3).