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By Alameda County Environmental Health at 2:06 pm, Dec 11, 2013

## Atlantic Richfield Company

**Chuck Carmel**

Remediation Management Project Manager

PO Box 1257  
San Ramon, CA 94583  
Phone: (925) 275-3804  
Fax: (925) 275-3815  
E-Mail: shannon.couch@bp.com

November 29, 2013

Re: Additional Site Sampling Activities  
Former BP Service Station #11104  
1716 Webster Street  
Alameda, California  
ACEH Case #RO0000281

"I declare, that to the best of my knowledge at the present time, that the information and/or recommendations contained in the attached document are true and correct.

Submitted by,



Chuck Carmel  
Remediation Management Project Manager

Attachment



875 Cotting Ln., Suite G, Vacaville, CA 95688

[T] 707-455-7290 [F] 707-455-7295

broadbentinc.com

**CREATING SOLUTIONS. BUILDING TRUST.**

November 29, 2013

Project No. 06-88-644

Atlantic Richfield Company  
P.O. Box 1257  
San Ramon, CA 94583  
Submitted via ENFOS

Attn.: Mr. Chuck Carmel

Re: Additional Site Sampling Activities, Former BP Station No. 11104, 1716 Webster Street.  
Alameda, California; ACEH Case No. RO0000281

Dear Mr. Carmel

Broadbent & Associates, Inc. (Broadbent) is pleased to submit this letter documenting recent activities concerning potential Site Closure for the former BP station No. 11104 located at 1716 Webster Street, Alameda, California (Site). This letter has been prepared to document activities conducted by Broadbent and BP in attempting to work with the current Site owner and consultant (United Petroleum, Mr. Terry Grayson, and Alfa Environmental Remediation, Inc. [Alfa]) since a meeting that took place between all BP, Broadbent, United Petroleum, Mr. Grayson, Alfa, and the Alameda County Environmental Health Agency (ACEH) on October 16, 2013. Two recent Site activities were discussed at that meeting and it was agreed that an additional coordinated effort would be made by all parties involved to conduct additional sampling regarding the following current Site conditions:

- The recent presence of light non aqueous phase liquid (LNAPL) in well RW-1 that fuel fingerprint testing has indicated is diesel product
- Recent soil and water testing conducted by Alfa that indicates a release from the former waste oil tank

A discussion of BP and Broadbent's position regarding these recent Site conditions are presented below. A closure request was recently submitted by Broadbent for the Site with a document entitled *Conceptual Site Model and Case Closure Request* dated August 21, 2013 (CCR and CSM; Broadbent, 2013). This document summarized current Site conditions and evaluated these conditions for Site Closure under the Low Threat UST Closure Policy (LTCP; CRWQCB, 2012). Ultimately, case closure was recommended because the areas where the Site did not meet LTCP requirements were not the responsibility of BP, but instead the current property owners.

During the October 16, 2013 meeting with all parties agreed that well RW-1, which had historically contained LNAPL, would be sampled by Broadbent with Alfa present to collect a split sample. Additionally, Broadbent would provide access to additional wells onsite that day for Alfa personnel to sample in order the further evaluate the presence of dissolved-phase diesel in groundwater and impacts from the waste oil tank. The following section documents correspondence and activities regarding attempts by Broadbent to carry out this joint sampling.

### Additional Sampling at Site

On October 25, 2013 Ms. Kristene Tidwell of Broadbent inquired with Mr. Grayson if the morning of October 31, 2013 would accommodate everyone's schedule for Site sampling activities. As noted above, it was Broadbent's and BP's understanding that United representatives would be taking a split sample from Broadbent technicians and that Broadbent would be providing access to the remaining wells. On October 25, 2013 Mr. Grayson indicated via email that this date would be acceptable. On Wednesday October 30, 2013 Mr. Constantinescu of Alfa asked for a name and phone number of the technician that would be onsite, which was then provided along with information that Broadbent staff would be onsite at 8:00 AM. Broadbent technicians arrived at the Site at 8:00 AM on October 31, 2013, as scheduled.

At the time of arrival to the Site Broadbent technicians noted that no representatives from Alfa were onsite and a call was placed to Mr. Constantinescu to inquire as to their estimated time of arrival. Broadbent was informed by Mr. Constantinescu that he was only interested sampling well MW-3, and no one would arrive onsite until 11:00 AM. Broadbent technicians continued in sampling of RW-1, as scheduled. The well contained approximately 0.02 feet of LNAPL, and sampling was therefore not conducted. A field data sheet from the sampling event is attached.

After performing the scheduled activities at well RW-1, Broadbent technicians waited for staff from Alfa to arrive to sample well MW-3. At approximately 11:30 AM when Alfa personnel had yet to arrive, Broadbent technicians called Mr. Constantinescu and asked if they were on their way, and Mr. Constantinescu stated that they would be there 'maybe' by 2:00 PM, and that they had other jobs.

At that time, Kristene Tidwell of Broadbent (myself), personally called Mr. Constantinescu to determine if Broadbent technicians should continue to wait for Alfa personnel to arrive. It was requested that Broadbent should 'leave the well open' (MW-3) and Alfa personnel would come by when they could. Ms. Tidwell responded that it was agreed upon to provide access to the Site wells requested, but not leave them open. It was further explained that unattended wells could not be left open due to safety and security concerns, and BP requires the observation of all sampling activities regarding these wells. Ms. Tidwell informed Mr. Constantinescu that Broadbent technicians would be leaving the Site. Ms. Tidwell told Mr. Constantinescu that staff would be available the following week, and if an exact date and time that his staff would like to sample the well(s) is provided, Broadbent would accommodate them. Mr. Constantinescu responded that he would respond once he spoke to Mr. Grayson regarding this matter.

After summarizing these activities in an email and sending it to all parties involved, Mr. Grayson responded that they would be 'waiting to see our results' before performing any other sampling activities.

As summarized above, Broadbent and BP have attempted in good faith to perform the activities agreed to in the October 16, 2013 meeting. As the only tasks remaining that are keeping the Site open are to be performed by United Petroleum, we request that United Petroleum be directed by the ACEH to continue this work. We hereby request Case Closure and, if additional activities need to be carried out to characterize the recent diesel and/or waste oil tank releases, the ACEH can direct the current property owners to do so by opening a new case. The following section summarizes the position of BP regarding the current case as it relates to the BP gasoline release during BP operation of the Site.

### Justification for Case Closure

The Site meets the criteria for Closure under the Low Threat UST Closure Policy (LTCP; SWRCB, 2012) with the exception of recently measured (since 2011) diesel free-product in well RW-1 and the results of recent waste oil tank removal data. However, these exceptions are not the responsibility of BP to investigate and/or remediate. Justification as to why BP is not responsible for these Site conditions is presented below.

#### Recent Diesel Free Product in Well RW-1

BP sold the Site to ConocoPhillips in 1994. During the time of BP operations, diesel was never dispensed or stored at the Site. In 2009, when United Petroleum bought the station and began its operation, one of the existing site USTs was converted to a diesel UST. In 2011, a maximum of 0.06 feet of free product was measured in well RW-1, directly adjacent to the UST that had been recently converted to a diesel UST. Fuel fingerprinting analysis of the free product collected from well RW-1 indicated that the pattern most closely resembled a diesel product. Directly prior to the free product being observed in RW-1, gasoline analytes (benzene, gasoline range organics, etc.) were not detected in this well.

Although Diesel Range Organics (DRO) have not been analyzed in Site wells (because diesel was never dispensed by BP), DRO has been analyzed at the adjacent Chevron station (Drawing 1). Specifically, well B-6 at the Chevron station is located downgradient of Site well RW-1, but somewhat upgradient of the Chevron plume. Upon review of DRO concentration trends in Chevron well B-6, maximum of 2,740 micrograms per liter ( $\mu\text{g/L}$ ) DRO was detected in 1998. Since that time, DRO had been declining in concentrations and was near or at detection limits in 2008. In 2010 (shortly after United Petroleum converted the gasoline UST to diesel), DRO increased in well B-6 to 480  $\mu\text{g/L}$ . Current concentrations of DRO in Chevron well B-6 indicate no current DRO remaining impacts. The increase in DRO concentrations in well B-6 shortly after the conversion of the upgradient gasoline UST to diesel further indicates a potential diesel release from the converted UST.

The data presented above clearly indicates that BP is not liable to investigate or remediate any soil or groundwater as a result of DRO contamination.

#### Recent Waste Oil Tank Removal Data

In 1992 BP installed well MW-3 near the waste oil tank. Soil sample were collected from this location at 6 feet bgs and no constituent concentrations, including petroleum compounds, volatile organic compounds, or select metals above background levels (Appendix C of the CSM and CCR) were detected. BP sold the station to ConocoPhillips in 1994, shortly after the soil sampling described above (1992). Groundwater monitoring data from well MW-3 in 1992 and 1993, while BP still operated the station, does not indicate a petroleum release from the waste oil tank (Table 2 of the CSM and CCR).

All data related the environmental case indicates that BP is not responsible for investigating or remediating impacted soil or groundwater related to the recent waste oil tank operated and then removed by United Petroleum.

### Closing

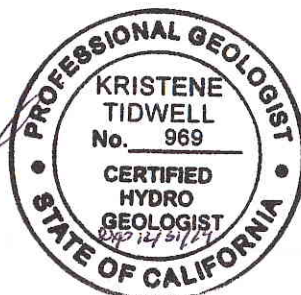
The data and Site evaluation presented in this letter as well as the Closure Request indicate that this Site meets the criteria of the Low Threat Closure UST Policy, with the exceptions of what is not the responsibility of BP (as described above). We recommend that the current environmental case be closed and, if the ACEH deems necessary, a new case be open for the current Site owners/operators. We would like to request a meeting with the ACEH discuss the appropriate path forward towards Site Closure.

Should you have questions or require additional information, please do not hesitate to contact us at (707) 455-7290.

Sincerely,  
BROADBENT & ASSOCIATES, INC.



Kristene Tidwell, P.G., C.Hg.  
Senior Geologist



### Attachment

Drawing 1: Site Map  
Field Data sheet

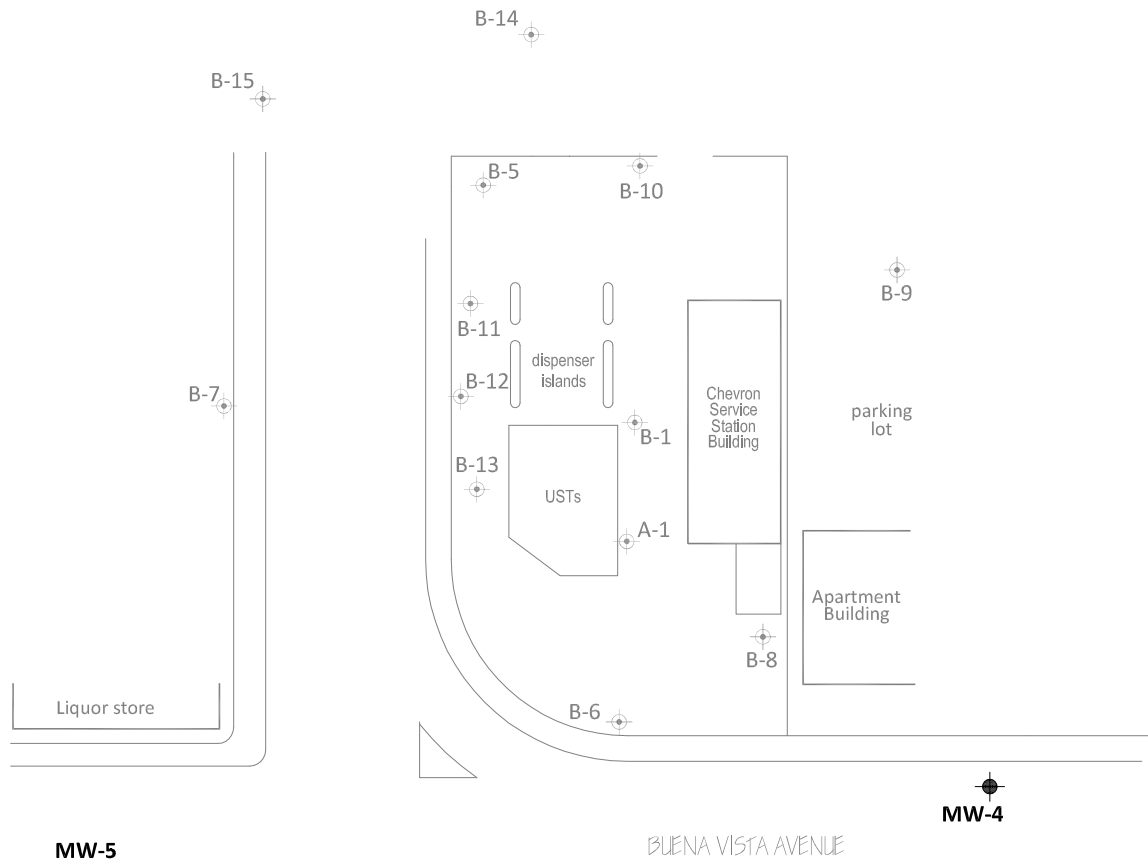
cc: Ms. Dilan Roe, PE, Alameda County Environmental Health (Submitted via ACEH ftp site)  
Electronic copy uploaded to GeoTracker

### References




Broadbent & Associates (Broadbent), 2013. Case Closure Request and Conceptual Site Model, August 21.

State Water Resources Control Board (SWRCB), 2012. Low-Threat Underground Storage Tank Case Closure Policy, August 17.

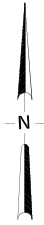
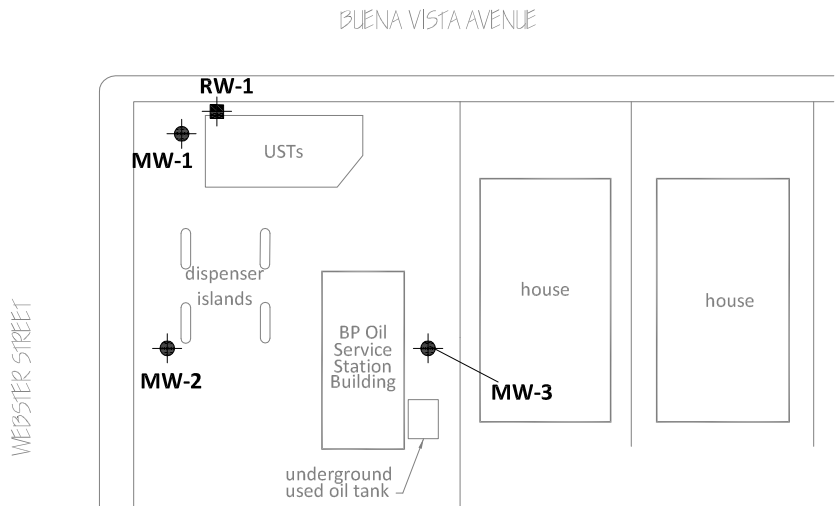
## ATTACHMENTS



**LEGEND**

-  Monitoring well
-  Groundwater recovery well
-  Chevron monitoring well

NOTE: SITE MAP ADAPTED FROM CAMBRIA ENVIRONMENTAL FIGURES. SITE DIMENSIONS AND FACILITY LOCATIONS NOT VERIFIED.



**BROADBENT**  
875 Cotting Lane, Suite G  
Vacaville, California 95688  
Project No.: 06-88-644 Date: 7/9/2013

Station #11104  
1716 Webster Street  
Alameda, California

Site Map

Drawing

**1**



DAILY REPORT

Page 1 of 1

Project: BP 11104 Project No.: 06-88-644

Field Representative(s): A. Martinez / A. Hernandez Day: Thursday Date: 10/31/13

Time Onsite: From: 0800 To: 1200 ; From: To: ; From: To:

- Signed HASP Safety Glasses Hard Hat Steel Toe Boots Safety Vest
UST Emergency System Shut-off Switches Located Proper Gloves
Proper Level of Barricading Other PPE (describe)

Weather: Sunny

Equipment In Use: Interface probe, peristaltic pump

Visitors: None

Table with 2 columns: TIME and WORK DESCRIPTION. Contains handwritten entries for 0800, 0915, 0930, 1030, and 1200.

Signature: [Handwritten Signature]





