



BP OIL

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HAZMAT
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BP Oil Company
Environmental Resources Management
Building 13, Suite N
295 SW 41st Street
Renton, Washington 98055-4931
(206) 251-0667

October 13, 1994

Alameda County Health Care Services Agency
Attention Ms. Juliet Shin - Hazardous Materials Specialist
1131 Harbor Bay Parkway, #250
Alameda, CA 94502-6577

10/25/94
① offense WP
②

RE: BP Oil Site No. 11104
1716 Webster Street
Alameda, CA

Dear Ms. Shin:

I am writing in response to your August 18, 1994, letter, and to follow-up our conversation on August 16, 1994.

First, thank you for your concurrence with our plan to sample monitoring wells MW-2, MW-3, MW-4, and MW-5 on a semi-annual basis. As noted in your letter, prior analyses have shown that fuel constituents have not been detected, or that concentrations are very low. By copy of this letter to Alisto Engineering Group, one of the sampling events should be conducted when lower water table elevations are anticipated. Please note that I have been in contact with Mark Miller of Chevron so that we may perform joint groundwater monitoring. My intention is that our consultants work out the logistics of this work without further involvement on my part.

As we discussed on August 16, I have solicited competitive bids for the investigation of backfill around the sewer lines in Webster Street and Buena Vista Avenue. A contract was recently let to Fugro West, Inc. I have attached a copy of the resulting workplan for your review and approval. Please give me a call if you have any questions or comments regarding this submission. My direct dial extension is (206) 251-0689.

Sincerely,


Scott T. Hooton
Environmental Resources Management

attachment

cc: site file
Brady Nagle - Alisto

See
10/30



BP OIL

ALCO
HAZMAT
94 OCT 17 PM 3:24

BP Oil Company
Environmental Resources Management
Building 13, Suite N
295 SW 41st Street
Renton, Washington 98055-4931
(206) 251-0667

October 13, 1994

Alameda County Health Care Services Agency
Attention Ms. Eva Chu
1131 Harbor Bay Parkway #250
Alameda, CA 94502-6577

RE: Notice of Violation
Former BP Site 11104
1716 Webster Street
Alameda, CA

Dear Ms. Chu:

This letter responds to a Notice of Violation (NOV), dated October 3, 1994, and received by my office on October 7, 1994. The NOV pertains to an investigation requested by Ms. Juliet Shin during a telephone conversation on May 5, 1994. Since that time, BP has submitted cross-sections depicting the orientation of sewer lines relative to soil types and historical groundwater elevations documented at the site, and proposed a scope of work to the Alameda County Health Care Services Agency in a letter to Ms. Juliet Shin dated August 2, 1994. Ms. Shin called on August 16, and informed me that she was in agreement with the proposed approach. I subsequently issued a request for proposal, and let a contract for this work to Fugro West, Inc., of Roseville, CA.

*WSP requested
in May - this
was not until
until approval
was received.*

First, There is some confusion on my part as to whom I should be corresponding with regarding this matter. The NOV referred to correspondence from the county dated July 13 and August 18, but does not acknowledge my response, or the efforts undertaken by BP to respond to the concerns previously raised by Ms. Shin. I have attempted to reach you to discuss this matter personally, but you were not available.

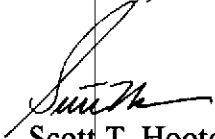
Attached is a copy of the workplan that you have requested. Please note that I have also forwarded a copy of the workplan to Ms. Shin. BP will implement the workplan upon approval by Alameda County.

With respect to enforcement issues, BP has complied with all of the due-dates requested in prior correspondence from the Alameda County Health Care Services Agency. Frankly, we do not understand how Alameda County can issue a NOV when we have complied with all of the due dates requested, unless you were not aware of our previous submittals to Ms. Shin.

In addition, your letter asserts that BP is in violation of section 25298 of the California Health and Safety Code regarding closure of underground storage tanks. We cannot agree with this assertion. As you know, section 25298 requires operators of underground storage tanks to perform an investigation for residual contamination and corrective action if contamination is detected. As you know, the assessment of the sewer lines should complete the site investigation. It is not the law, and indeed cannot be the law, that an owner of underground storage tanks is in violation of section 25298 while it conducts the investigation required by the statute!

In the future, I would prefer that you give me a call if you have any questions or concerns regarding the status of any site investigation prior to sending formal notice letters. In that way, we can resolve any problems quickly and efficiently. Please give me a call if you have any questions or concerns. My direct dial extension is (206) 251-0689.

Sincerely,



Scott T. Hooton
Environmental Resources Management

attachment

cc: site file
Juliet Shin - ACHCSA



FUGRO WEST, INC.

October 12, 1994
Project No. 9447-8592

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

1050 Melody Lane, Suite 160
Roseville, California 95678
Tel: (916) 782-2110
FAX: (916) 786-7830

OCT 12 1994

Subject: Limited Subsurface Investigation Workplan
BP Facility No. 11104
1716 Webster Street
Alameda, California

Dear Mr. Hooton:

Fugro West, Inc., (Fugro), is pleased to provide BP Oil Company (BP) this workplan to conduct a limited subsurface investigation at the subject site (Figure 1).

Purpose

The purpose of the investigation is to obtain subsurface information and groundwater samples to assess whether petroleum hydrocarbons in groundwater have preferentially migrated along the sewer line backfill in the middle of Webster Street (California State Highway 61) and Buena Vista Avenue (Figure 2).

Proposed Work

The proposed scope of work will be conducted according to the Fugro standard operating procedures (SOP) included as Attachment 1, and the site safety plan included as Attachment 2.

Four 2-inch-diameter soil borings will be created by advancing drilling rods with a cone penetrometer (CPT) rig in the sewer line trenches located in Webster Street and Buena Vista Avenue (Figure 2). The borings will be advanced to first encountered groundwater. Using a Hydropunch™ tool or equivalent, a grab groundwater sample will be collected from each boring. Groundwater is expected to be found approximately 5 to 7 feet below grade. Because of the shallow groundwater and the boring locations in the backfill material of the sewer trench, no soil samples will be collected. Soil types and properties will be assessed from in-situ CPT measurements.

To avoid drilling into or through the sewer lines, a utility locating company and Underground Service Alert will be used to clear the proposed boring locations of any obstructions. Also the first five feet of each boring may be augered by hand.



Mr. Scott Hooton
October 12, 1994 (9447-8592)

No soil cuttings or waste water will be generated. After removing the drilling rods, the holes will be grouted and finished to grade with a bentonite/cement slurry. The work is expected to be completed within several hours.

Laboratory Analyses and Practical Quantitation Limits (PQL)

Groundwater samples will be delivered under chain-of-custody to Pace Inc. of Novato, California, a State-certified analytical laboratory, for chemical analysis. The suite of analyses and PQL, or detection limits, to be used are as follows:

For water -

- a) TPH, as gasoline, by EPA Method 8015 (PQL = 0.05 ppm);
- b) BTEX, by EPA Method 8020 (PQL = 0.0005 ppm); and

Laboratory quality assurance and control is addressed in Fugro SOP-5.

Permitting and Project Contacts

Prior to beginning work, encroachment permits will be required from the California Department of Transportation (Caltrans) and the City of Alameda. Traffic control may require working in off hours (e.g., 3:00 to 5:00 am). Drilling permits will have to be obtained from the Water Resources Management Zone 7 Water Agency.

Project contacts and representatives include the following:

Auro Bustillo
Caltrans District 4-Permits
Post Office Box 23660
Oakland, California 94623-0660

Wyman Hong
Zone 7 Water Agency
5997 Parkside Drive
Pleasanton, California 94588

Bill Mary
City of Alameda
Central Permit Office
2263 Santa Clara Ave, Room 204
Alameda, California 94501

Paul Graff and Steve Osborn
Fugro West, Inc.
1050 Melody Lane Suite 160
Roseville, California 95678

Juliet Shin
Alameda County Environmental Health Department
UST Local Oversight Program
80 Swan Way, Room 200
Oakland, California 94621



Mr. Scott Hooton
October 12, 1994 (9447-8592)

Remarks/Signatures

The information contained within this workplan reflects our professional opinions, and was developed in accordance with currently available information and accepted geologic, hydrogeologic, and/or engineering practices at this time and for this site. This workplan has been prepared solely for the use of BP Oil Company. Any reliance on this workplan by parties other than BP shall be at such parties' sole risk.

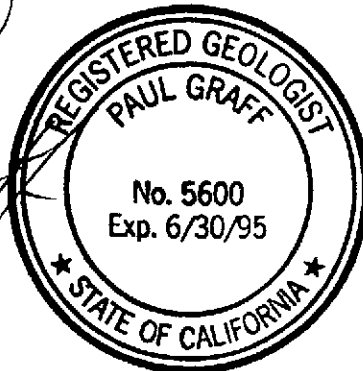
The work proposed herein shall be conducted under the review and supervision of the professional geologist, registered with the State of California, whose signature appears below.

Sincerely,

FUGRO WEST, INC.

Paul Graff
FOR
Steven J. Osborn
Staff Geologist

Paul Graff
Paul Graff
Senior Geologist
CRG # 5600



10/12/94
Date

SJO/PKG:sdh

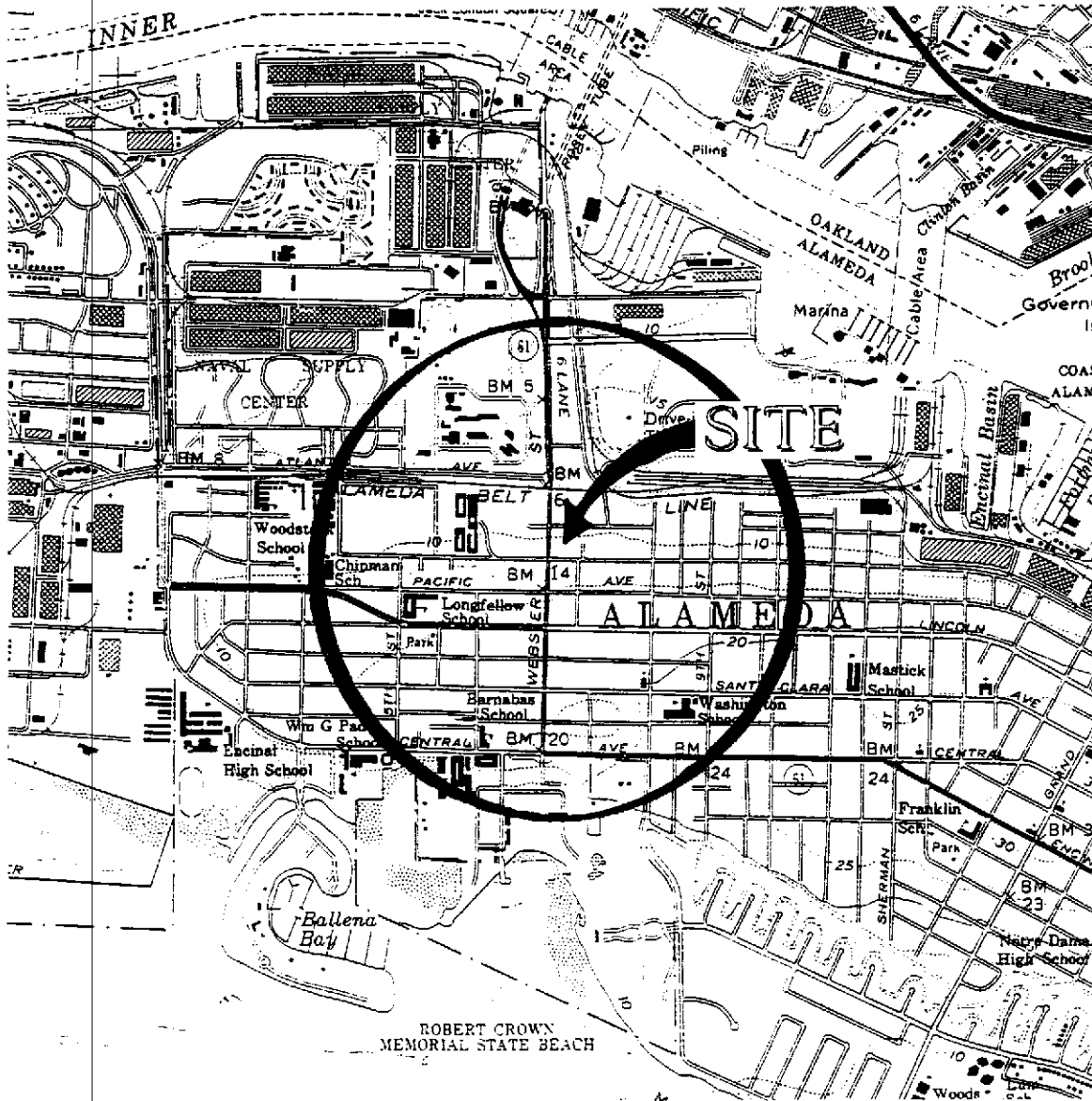
Attachments

FIGURES

FIGURE 1 SITE LOCATION MAP
FIGURE 2 SITE MAP WITH PROPOSED
BORING LOCATIONS

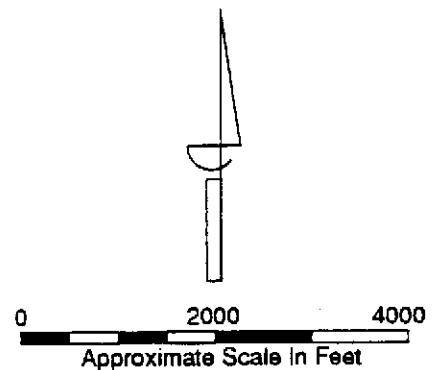
ATTACHMENTS

ATTACHMENT 1 STANDARD OPERATING PROCEDURES
ATTACHMENT 2 SITE SAFETY PLAN



GENERAL NOTES:

BASE MAP FROM USGS
7.5 MINUTE TOPOGRAPHIC
OAKLAND WEST, CA



DRAWN BY:
J. Paradis

DATE:
September 21, 1994

REVISED BY:

DATE:

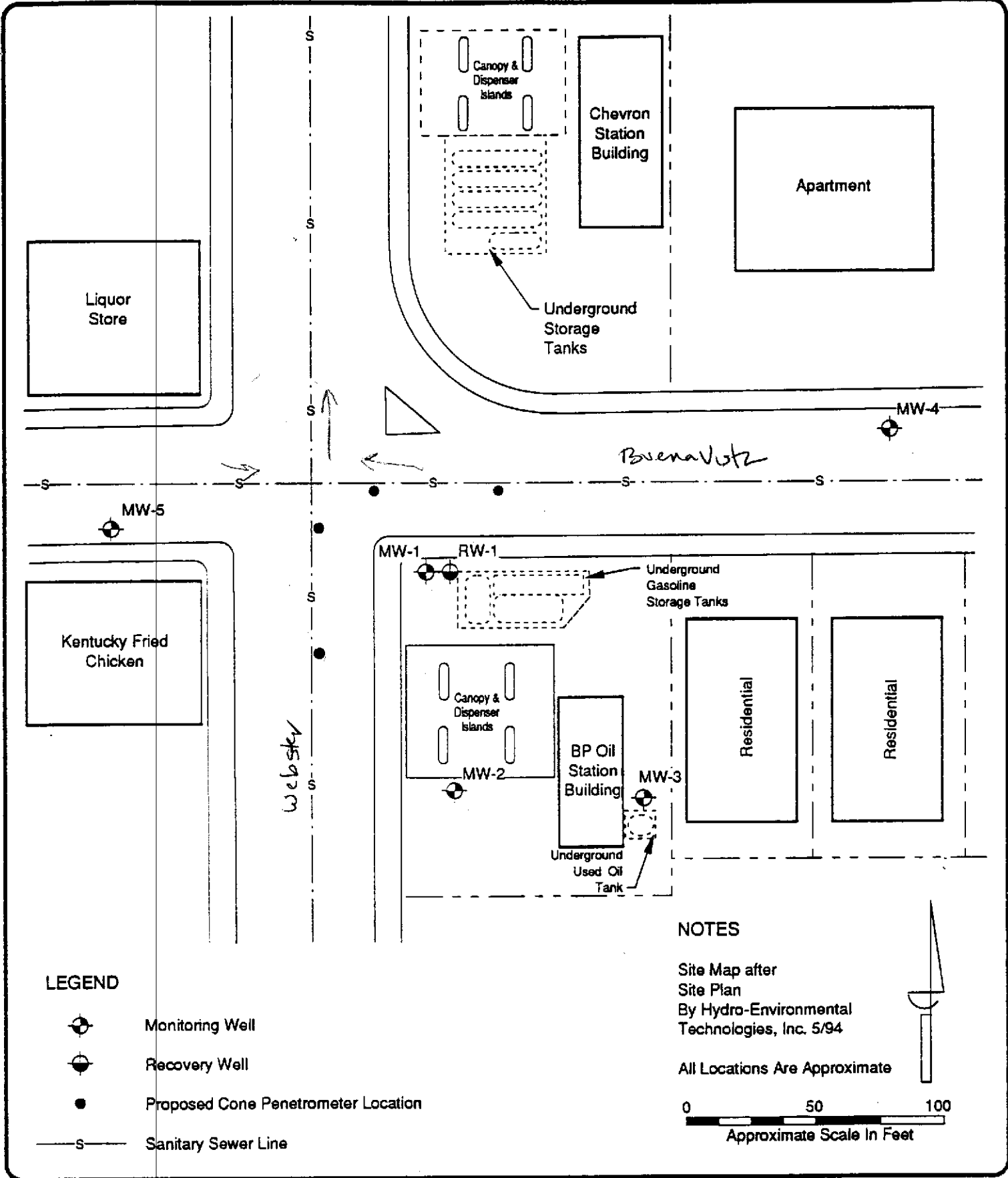
SITE LOCATION MAP

BP Oil Facility NO. 11104
1716 Webster Street
Alameda, CA





FIGURE

1

PROJECT NUMBER:
94-47-8592



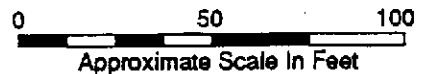
LEGEND

-  Monitoring Well
-  Recovery Well
-  Proposed Cone Penetrometer Location
-  Sanitary Sewer Line

NOTES

Site Map after
Site Plan
By Hydro-Environmental
Technologies, Inc. 5/94

All Locations Are Approximate



DRAWN BY: J. Paradis
DATE: September 21, 1994
REVISED BY:
DATE:

**SITE MAP
WITH PROPOSED BORING LOCATIONS**

BP Oil Facility NO. 11104
1716 Webster Street
Alameda, CA

**FIGURE
2**

PROJECT NUMBER:
94-47-8592

ATTACHMENT 1
STANDARD OPERATING PROCEDURES

FUGRO WEST, INC.
STANDARD OPERATING PROCEDURES
RE: SOIL CLASSIFICATION
SOP-3

Soil samples are classified according to the Unified Soil Classification System. Representative portions of the samples may be submitted under strict chain-of-custody to an analytical laboratory for further examination and verification of the in-field classification, and analysis of soil mechanical and/or petrophysical properties. The soil types are indicated on logs of either excavations or borings together with depths corresponding to the sampling points, and other pertinent information.

FUGRO WEST, INC.
STANDARD OPERATING PROCEDURES
RE: SAMPLE IDENTIFICATION AND CHAIN-OF-CUSTODY PROCEDURES
SOP-4

Sample identification and chain-of-custody procedures ensure sample integrity and document sample possession from the time of collection to its ultimate disposal. Each sample container submitted for analysis is labeled to identify the job number, date, time of sample collection, a sample number unique to the sample, any in-field measurements made, sampling methodology, name(s) of on-site personnel and any other pertinent field observations also recorded on the field excavation or boring log.

Chain-of-custody forms are used to record possession of the sample from time of collection to its arrival at the laboratory. During shipment, the person with custody of the samples will relinquish them to the next person by signing the chain-of-custody form(s) and noting the date and time. The sample-control officer at the laboratory will verify sample integrity, correct preservation, confirm collection in the proper container(s), and ensure adequate volume for analysis.

If these conditions are met, the samples will be assigned unique laboratory log numbers for identification throughout analysis and reporting. The log numbers will be recorded on the chain-of-custody forms and in the legally-required log book maintained in the laboratory. The sample description, date received, client's name, and any other relevant information will also be recorded.

FUGRO WEST, INC.
STANDARD OPERATING PROCEDURES
RE: LABORATORY ANALYTICAL QUALITY ASSURANCE AND CONTROL
SOP-5

Replicates, spikes, blanks, spiked blanks, and certified reference materials are routinely analyzed at method-specific frequencies to monitor precision and bias. Additional components of the laboratory Quality Assurance/Quality Control program include routine instrument calibration and:

1. Participation in state and federal laboratory accreditation/certification programs;
2. Participation in both U.S. EPA Performance Evaluation studies (WS and WP studies) and inter-laboratory performance evaluation programs;
3. Standard operating procedures describing routine and periodic instrument maintenance;
4. "Out-of-Control"/Corrective Action documentation procedures; and,
5. Multi-level review of raw data and client reports.

FUGRO WEST, INC.
STANDARD OPERATING PROCEDURE
RE: HYDROPUNCH SAMPLING
SOP-14

Starting from the capillary fringe, the hydropunch is pushed so that the tip is approximately 3 feet below the water table. The sleeve protecting the 4-foot PVC screened interval is then pulled up 3.5 feet, exposing the screened interval to the capillary fringe and the saturated zone. The system is left undisturbed for approximately 15 minutes to allow formation water to infiltrate the screen, and fines to settle out.

The sampling equipment consists of either a "Teflon" or stainless steel bailer. In general and depending on the intended laboratory analysis, 40-milliliter glass, volatile organic analysis (VOA) vials, with "Teflon" septa, are used as sample containers.

The groundwater sample is decanted into each VOA vial in such a manner that there is no meniscus at the top of the vial. A cap is quickly secured to the top of the vial. The vial is then inverted and gently tapped to see if air bubbles are present. If none are present, the vial is labeled and refrigerated for delivery, under strict chain-of-custody, to the analytical laboratory. Label information includes a unique sample identification number, job identification number, date, time, type of analysis requested, and the sampler's name.

For quality control purposes, a field blank may be prepared in the field. The field blank is prepared after a bailer has been either steam cleaned or properly washed, prior to use in the next well, and is analyzed along with the other samples. The field blank analysis demonstrates the effectiveness of the in-field cleaning procedures to prevent cross-contamination.

To minimize the potential for cross-contamination between wells, all well development and water sampling equipment not dedicated to a well is either steam cleaned or properly washed between use.

In the event the water samples cannot be submitted to the analytical laboratory on the same day they are collected (e.g., due to weekends or holidays), the samples are temporarily stored until the first opportunity for submittal either on ice in a cooler, such as when in the field, or in a refrigerator at Fugro's office.

ATTACHMENT 2
SITE HEALTH AND SAFETY PLAN

Job No: 94-47-8592

SITE SAFETY PLAN

Job Title: BP Service Station #11104
Job Address: 1716 Webster Street
Alameda, CA
Project Manager: Paul Graff Home Phone: (916) 632-7701
Fugro Office Phone: (916) 782-2110 (Roseville)

Introduction

The purpose of this site safety plan is to establish requirements for protecting the health and safety of site workers for the above listed project. It contains safety information, instructions, and procedures.

Organization

The following personnel are designated to carry out the stated job functions pertaining to the site work. All site personnel have read this safety plan and are familiar with its provisions.

	<u>Name</u>	<u>Company</u>	<u>Signature</u>	<u>Date</u>
Site Safety Officer:	Steven J. Osborn	Fugro West, Inc.		
Project Team Leader:	Paul Graff	Fugro West, Inc.		
Field Team Leader:	Steven J. Osborn	Fugro West, Inc.		
Field Personnel: (print name)		Gregg Insitu		

Work was accomplished in accordance with the site safety plan, with the following exceptions:

Site Safety Officer: _____

Date: _____

(RETURN ORIGINAL COPY TO JOB FILE WITH SIGNATURES)

Emergency Response (Dial 9-1-1)

Nearest phone location:

Closest Emergency Facility: Alameda Hospital
Address: 2070 Clinton
Map Attached Alameda CA

Phone: (510) 522-3700

Ambulance response time: Approximately 10 to 15 minutes

Fire and Police may also be contacted by dialing 911. Ambulance service is to be used in emergencies if the injured person can not safely be transported by a Fugro West, Inc. vehicle. When in doubt as to the severity of the situation, call 911.

Site Description

Location: 1716 Webster Street (State Highway 61)
Hazards: Petroleum Hydrocarbons
Area Affected: Unknown
Surrounding Land Use: Commercial
Topography: Generally flat
Weather Conditions Expected: Sunny (70°-80°)

Project Objective

The objective of this project is to determine if petroleum hydrocarbons in groundwater have preferentially migrated along the sewer line backfill in Webster Street and Buena Vista Avenue.

Agency Representative(s)

Name: Juliet Shin
Federal/State/Local: Local
Department/Program: Alameda County Environmental Health Department
Phone Number: (510) 567-6700

Name: Bill Mary
Federal/State/Local: Local
Department/Program: City of Alameda Public Works Department
Phone Number: (510) 748-4518

Site Setup

A safe perimeter will be established at the work site. Traffic control equipment and procedures will be used if necessary. The area will be restricted to required personnel only. No unauthorized personnel will be allowed within the safe perimeter. Control boundaries will be marked with caution tape if necessary to maintain the established safe perimeter. The on-site command post will be established at the Fugro West, Inc. vehicle on-site.

Hazard Evaluation

Chemicals On-site. The following substance(s) suspected to be on site. The primary hazards of each are identified along with their concentrations, if known.

<u>Substance Involved</u>	<u>Primary Hazard</u>	<u>Concentration (ppm)</u>	
		<u>Soil</u>	<u>Groundwater</u>
Gasoline and diesel (in soil and groundwater)	Toluene	unknown	unknown
	Benzene	unknown	12
	Ethylbenzene	unknown	unknown
	Xylenes	unknown	unknown

Physical Hazards On-site. Normal physical hazards are present from drilling activities. Personnel are required to follow Fugro West, Inc.'s general health and safety plan, a copy of which is kept at Fugro West, Inc.

General Safety Rules

1. There will be no eating, drinking or smoking within the safe perimeter set up.
2. Fire extinguishers should be on site on or near Fugro West, Inc.'s vehicle.
3. A first aid kit is located at the on-site command post, within the Fugro West, Inc. vehicle.

Equipment

Personal Protective Equipment. Based on the evaluation of potential hazards, the level of protection deemed appropriate for this site is Level D. If organic vapor concentrations in the breathing zone exceed 50 ppmv, EPA level C personal protective equipment will be used. These concentrations are based on permissible exposure limits (PELs) and threshold limit values (TLVs) of the various contaminants anticipated, with some consideration given to possible contaminants encountered in combination.

Level D equipment includes, as required:

- hard hat
- steel toe and shank boots
- safety glasses or goggles
- long sleeve shirt or coveralls

Level C equipment includes:

- full or half face respirator equipped with dual filters appropriate for suspected\known contaminants
- and if required,
- steel toe neoprene boots
- Tyvek suits
- latex inner gloves
- PVC outer gloves
- duct tape

Decontamination Procedures

Personnel and equipment leaving the job site shall be decontaminated. The following procedures shall be followed:

1. Equipment contacting potentially hazardous materials will be cleaned prior to beginning work and between uses. Most equipment will either be steam cleaned or washed with detergent and rinsed in clean water.
2. Personnel will wash as soon as possible after completion of work and prior to eating, drinking, smoking, etc.

Safety Monitoring

1. The designated Site Safety Officer is responsible for safety recommendations on site during the investigation.
2. A safety meeting will be conducted on-site by the Site Safety Officer prior to initiation of activities. The scope of work will be discussed and any other topic considered relevant by the Site Safety Officer.

Environmental Monitoring

1. The following environmental monitoring instruments shall be used during site activities:

Organic Vapor Analyzer - discrete soil samples shall be measured for organic vapors. Occasional measurements will be taken of soils being removed. The soils on the site may contain contamination from volatile organic compounds. Organic vapor measurements in excess of 1,000 ppmv will require immediate cessation of the drilling and use of a combustible gas indicator to determine if explosive conditions are present.

Organic vapor measurements within the breathing zone exceeding 50 ppmv will require the use of EPA level C personal protective equipment.

2. The Site Safety Officer shall be notified of any on-site emergencies or potential hazards noticed by other site personnel. The Site Safety Officer is responsible for determining whether it is safe to proceed. If the Site Safety Officer does not or can not make the determination, then the Project Manager shall be contacted prior to continuing with the investigation.
3. If any equipment on site fails to operate properly, the Field Team Leader and Site Safety Officer shall be notified. The effect of this failure on continuing operations at the site will be assessed. If the failure affects the safety of personnel or prevents completion of the workplan tasks, all personnel shall leave the job site until the situation is evaluated and appropriate actions taken.

Personal Monitoring

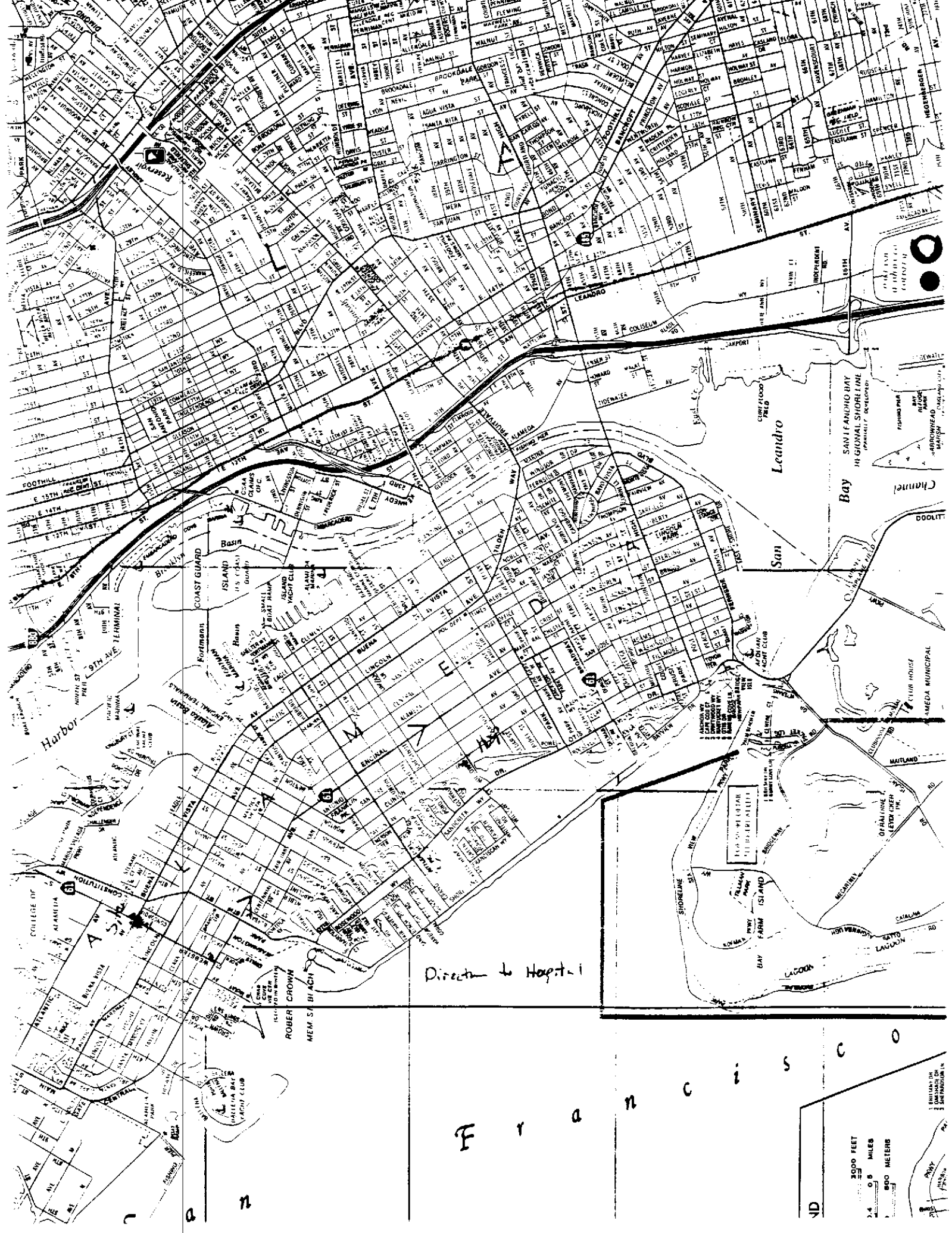
The following personal monitoring will be in effect on site:

Site personnel will be observed by the Site Safety Officer to determine whether they are operating in a safe manner. Special attention will be given to potential heat stress and unsafe behavior around equipment.

Training Requirements

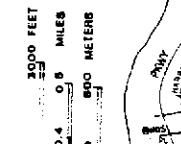
All personnel will be up-to-date on the OSHA requirements set forth in 29 CFR 1910.120.

HOSPITAL MAP ATTACHED



Direct to Hospital

Francisco



BRITISH OR
AMERICAN OR
METRIC