

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

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

July 7, 2006

Mr. Paul Supple  
Atlantic Richfield Company  
PO Box 6549  
Moraga, CA 94570

Ms. Shelby Lathrop  
Conoco Phillips  
76 Broadway  
Sacramento, CA 95818

Mr. Raymond Yeung  
1541 Park Street  
Alameda, CA 94501-2933

Dear Messers: Supple and Yeung and Ms. Lathrop

Subject: Fuel Leak Case No. RO0000318; BP Station # 11266, 1541 Park Street, Alameda, CA

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the "First Quarter Status Report," dated April 5, 2006," and prepared by URS Corporation Inc (URS). ACEH has also reviewed the report, "Request for Site Closure, BP Service Station #11266, 1541 Park Street, Alameda, CA," and submitted by URS in February 2003. To continue the site closure process, ACEH requests that additional groundwater monitoring and sampling be completed at the site. Our request is based on the conclusion that the most recent groundwater monitoring data available in our files dates back to 2001. Considering the length of time since the site closure request was proposed, and in the interest of moving your site through the regulatory process we offer the following observations in the Technical Comments below.

Based on ACEH staff review of the case file, we request that you address the following technical comments and prepare a work plan detailing work to be performed, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENTS**

- 1. Monitoring Well Rehabilitation and Redevelopment.** ACEH requests that prior to monitoring well sampling, all onsite monitoring wells should be rehabilitated and/or redeveloped; thus allowing the collection of a representative sample of formation groundwater. Note that well redevelopment may require additional well volumes may need to be removed to assure that water quality parameters are satisfied. Please describe and present the results of the well redevelopment and rehabilitation activities in the report requested below.
- 2. Groundwater Sampling.** Groundwater monitoring has not been conducted at the site since 2001. Please sample the existing monitoring wells in order to determine current groundwater conditions throughout the site. The water samples are to be analyzed for TPHg and TPHd by EPA Method 8015M or 8260, BTEX, EDB, EDC, MtBE, TAME, ETBE, DIPE, TBA and EtOH by EPA Method 8260 and total lead.

If water quality data indicate that groundwater conditions are similar to historical conditions it is likely that the site will be moved toward closure. However, if current groundwater quality data

indicate that elevated concentrations of petroleum hydrocarbons exist further investigation may be warranted. Please present the results from groundwater monitoring and sampling in the report requested below. If water quality data indicate that groundwater conditions are similar to historical conditions it is likely that the site will be moved to closure. However, if current groundwater quality data indicate that elevated concentrations of petroleum hydrocarbons exist further investigation may be warranted.

### **TECHNICAL REPORT REQUEST**

Please submit technical reports to Alameda County Environmental Health (Attention: Steven Plunkett), according to the following schedule:

- **August 15, 2006** – Groundwater Monitoring Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

### **ELECTRONIC SUBMITTAL OF REPORTS**

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting)).

### **PERJURY STATEMENT**

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document

Messers. Supple, Lathrop and Yeung  
July 7, 2006  
Page 3

or report is true and correct to the best of my knowledge." An officer or legally authorized representative of your company must sign this letter. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

**PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS**

The California Business and Professions Code (Sections 6735 and 7835.1) require that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

**AGENCY OVERSIGHT**

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist

cc: Mr. Matt Herrick  
Broadbent & Associates  
1324 Mangrove  
Oakland, CA 94607

Ms. Lynelle Onishi  
URS Corporation Inc.  
1333 Broadway Ave.  
Oakland, CA 94610

Donna Drogos, ACEH  
Steven Plunkett, ACEH  
File

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>ISSUE DATE:</b> July 5, 2005
	<b>REVISION DATE:</b> May 31, 2006
	<b>PREVIOUS REVISIONS:</b> October 31, 2005, December 16, 2005
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

#### REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:  
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

#### Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

#### Submission Instructions

- 1) Obtain User Name and Password:
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)  
or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of: **ftp Site Coordinator**.
  - b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape and Firefox browsers will not open the FTP site.
  - b) Click on File, then on Login As.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto:firstname.lastname@acgov.org))
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

R0318

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



R0318

RAFAT A. SHAHID, Assistant Agency Director

ALAMEDA COUNTY-ENV. HEALTH DEPT.  
ENVIRONMENTAL PROTECTION DIV.  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577  
(510)567-6700

StID 624

May 5, 1995

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

RE: Groundwater Extraction at BP Oil Site #11266, 1541 Park St,  
Alameda 94501

Dear Mr. Hooton:

This office has been informed that the remediation system at the above referenced site has been shut down since October 1994. Contaminant concentrations appear to be increasing. Please provide an update on the status of the remediation system and any plans to modify your approach to remediation at this site.

In October 1994 I requested a report of the installation of recovery well RW-1. To date, I am not in receipt of this report. Please submit this report at your earliest convenience.

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

eva chu  
Hazardous Materials Specialist

cc: Peter Beaver, Alisto, 1777 Oakland Blvd, Suite 200, Walnut  
Creek, CA 94596  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0318

RAFAT A. SHAHID, Assistant Agency Director

StID 624

October 3, 1994

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

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
1131 HARBOR BAY PKWY., #250  
ALAMEDA CA 94502-6577  
(510)567-6700

**RE: QMR for BP Oil Site #11266, 1541 Park St, Alameda 94501**

Dear Mr. Hooton:

For the near future I shall be the case worker for the above referenced site. Having completed review of the case file, I would like the addition of the analysis for MTBE from well MW-2 on an annual basis. MTBE was detected in June 18, 1993 from wells RW-1, MW-1, and MW-2. Increasing concentrations of MTBE may suggest migration of the contaminant plume.

Also, this office is not requesting "speculations" of data provided, rather, that your consultants render their professional interpretation or conclusions, if any, of data provided, including anomalies noted. Conclusions/recommendations should be included in all future technical and quarterly monitoring reports.

Our file is missing the installation report for recovery well RW-1. Please submit this at your convenience. For your information, quarterly reports need not be send to the RWQCB if this agency is overseeing cleanup of the site.

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

eva chu  
Hazardous Materials Specialist

cc: Brady Nagle, Alisto, 1777 Oakland Blvd, Suite 200, Walnut  
Creek 94596  
files

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



R0318

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

June 20, 1994

Mr. Scott Hooton  
BP Oil Company  
Environmental Resource Mgmt.  
295 Southwest 41st St., Ste N  
Renton, WA 98055

STID 624

Re: Investigations at the BP Oil Facility #11266 (BP), located  
at 1541 Park St., Alameda, California

Dear Mr. Hooton,

This office has reviewed Alisto Engineering Group's last two quarterly reports, dated February 24, 1994 and May 3, 1994. This office is requesting that an Interpretation/Conclusion Section be included in the quarterly reports when anomalous behavior is noted, such as extreme fluctuations in contaminant concentrations or ground water gradients, etc. For example, in the March 1994 sampling event, a substantial rise in contaminant concentrations was observed in the ground water sample collected from Well MW-1. This office is interested in hearing the explanation for such behavior from an experienced, certified consultant.

Additionally, per our past conversations, this office requested that BP submit copies of the site's sanitary sewer district reports, which discuss the effectiveness of the active extraction system. This office has not yet received copies of these reports. Please submit the sanitary sewer district reports with the quarterly monitoring reports.

If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

  
Juliet Shin  
Hazardous Materials Specialist

cc: William Howell  
Alisto Engineering Group  
1777 Oakland Blvd., Ste 200  
Walnut Creek, CA 94596

Edgar Howell-File(JS)



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0318

RAFAT A. SHAHID, Assistant Agency Director

December 28, 1993

CERTIFIED MAILER #: P 386 338 232

BP Oil Co. Site #11266  
1541 Park St.  
Alameda, 94501  
UGTID: 624

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

**Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S)  
1541 Park St. Alameda, 94501**

Dear Owner/Operator:

According to our records your facility referenced above has not received a five-year permit to operate UST's. In order to obtain a permit you must complete the following items marked below and return them within 30 DAYS. The necessary forms are enclosed. You may complete a "Consolidated Underground Tank Management Plan" which will assist you in preparing a monitoring plan, site plot plan and spill response plan for your tank(s). If supplemental information or forms are required, please submit it to this office with the completed questionnaire and application forms:

- \_\_\_ 1. An accurate and complete plot plan.
- \_\_\_ 2. A written spill response plan. (enclosed)
- \_\_\_ 3. A written tank monitoring plan. (enclosed)
- \_\_\_ 4. Results of precision tank test(s), (initial and annual).
- \_\_\_ 5. Results of precision pipeline leak detector tests (initial and annual).
- \_\_\_ 6. Complete UST PERMIT FORM A-one per facility. (enclosed)
- \_\_\_ 7. Complete UST PERMIT FORM B-one per tank. (enclosed)
- \_\_\_ 8. Complete UST PERMIT FORM C-one per tank if information is available. (enclosed)
- \_\_\_ 9. Letter stating how the tank is to be maintained during one year closure.

Be advised that Title 23 of the California Code of Regulation prohibits the operation of "ANY" UST without a permit. If our records are in error, you must contact this office immediately TO AVOID POSSIBLE ENFORCEMENT ACTION. Please feel free to contact this office at (510) 271-4320; to answer any questions which may arise in completing the mandatory five-year permit process. Be prepared to provide your zip code to speak with the Hazmat Specialist handling your case.

Sincerely,

*Cynthia Manji for LARRY SETO.*

LARRY SETO  
Sr HazMat Specialist

c: Edgar Howell, Chief, Hazardous Materials Div. (files)

ALAMEDA COUNTY  
**HEALTH CARE SERVICES**

AGENCY  
DAVID J. KEARS, Agency Director



R0318

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

August 21, 1992

Exxon Corporation  
c/o Mr. Chester Bennett, Project Manager  
Tait and Associates, Inc.  
2880 Sunrise Blvd., Suite 206  
Rancho Cordova, CA. 95742

**Re: British Petroleum Oil Facility, 1541 Park Street, Alameda**

Dear Mr. Bennett;

Please find enclosed a five-year underground storage tank operating permit certificate. This permit is being issued for the site noted above, contingent upon the facility's compliance with all applicable underground tank monitoring requirements. These conditions are described in the revised Title 23, California Code of Regulations (C.C.R.) which became effective August 9, 1991. In order to maintain a valid permit, any deficiencies noted on the final underground tank inspection report or subsequent inspections, must be corrected. Below is a summary of the monitoring requirements for your facility:

**1. Section 2643 - Non-Visual Monitoring**

- a) Monitoring of piping shall be conducted at least hourly, which is capable of alerting the operator when 3 gallons have leaked or when a leak rate of three gallons per hour at 10 p.s.i. exist; and

Piping system integrity testing shall be conducted annually which is capable of detecting a minimum release of 0.1 gallon per hour at 1.5 times the (one and a one half times) normal operating pressure.

**2. Section 2663 - Overfill Prevention**

- a) Onsite personnel or the operator's agent must ensure that the volume available in the tank is greater than the volume of product or waste oil to be transferred into the tank before the transfer is made. Also the transfer process must be watched to prevent overfilling and spilling.
- b) Tank systems must maintain the approved spill container in good repair. Each spill container shall meet the requirements specified in section 2635 (c), of this regulation.

**3. Section 2632 et. seq., Monitoring Requirements for  
New Underground Storage Tanks**

- a) Owners or operators shall maintain the monitoring program approved by the local Agency which utilizes interstitial space monitoring as describe in subsection (c) 2 of the regulation noted above.
- b) Maintain the monitoring equipment in good repair and service in accordance with the manufacturer's instructions. In a written plan, describe the training needed for the operation of both the tank system and monitoring equipment. Maintain the plan on site for review.
- c) Maintain a spill response plan which demonstrates, to the satisfaction of the local agency, that any unauthorized release will be removed from the secondary containment system within the time consistent with the ability of the secondary containment system to contain the hazardous substance, but not more than 30 days. The plan shall include the names and titles of persons who can act under the response plan; and describe the method and equipment to be used for removing and properly disposing of any hazardous substances.

Page 3 of 3

**5. Section 2712 - Permit Conditions**

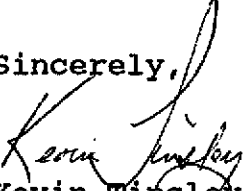
- a) Retain all monitoring and maintenance records on-site or at readily available location off-site, if approved by this agency, for a period of at least 3 years. These records must be made available, upon request within 36 hours, to the local agency or the Regional Water Quality Control Board.

The above listed requirements reflect the information currently on file and may not include deficiencies disclosed during routine inspections or changes that will result from tank and piping upgrading required by December 22, 1998. You may utilize other release detection methods for tanks and pipelines as outlined in the revised Title 23, C.C.R.. Please send a letter to this office notifying us of any changes in the monitoring methods.

Consult the revised Title 23, C.C.R. regarding any additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916)323-1262.

Should you have any questions or concerns regarding the contents of this letter, please call me at (510)271-4320.

Sincerely,



Kevin Tinsley

Hazardous Materials Specialist

cc: Pam Evans, Senior Haz. Mat. Specialist, AlCo. E.H.D.  
Brian Oliva, Haz. Mat. Specialist, AlCo. E.H.D.

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



Roals

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH  
Hazardous Materials Division  
80 Swan Way, Rm. 200  
Oakland, CA 94621  
(510) 271-4320

March 25, 1992

STID# 624

Mr. Peter DeSantis  
BP Oil Co.  
2868 Prospect Park Dr.,  
suite 360  
Rancho Cordova, CA 95679

Subject: BP Oil Facility #11266, 1541 Park St., Alameda, CA

Dear Mr. DeSantis:

This office is in receipt of a Remedial Action Plan dated February 28, 1992, for the aforementioned site, submitted by Hydro Environmental Technologies Inc., (HETI), your consultant of record. Thank you for the prompt attention to the January 30, 1992 request for such a plan.

Upon review of the plan, and a subsequent phone conversations with Fred Moss (HETI), this office concurs with the plan as submitted with the following clarifications:

- 1) Please provide additional information concerning the bioremediation system for the contaminated water. Please include the type of organisms, either natural to the area, or an introduced strain. This office would prefer the use of naturally occurring bacteria.
- 2) Provide copies of the permit for the recovery well to this office.
- 3) Provide a site safety plan for the well installation and also for the remediation system installation.
- 4) Indicate to this office the criteria used in the control of the activated carbon drum, in terms of usage or non-usage, and specifically when it will be utilized.
- 5) This office agrees with HETI regarding the daily sampling of the groundwater for the first week. Alameda County will review the data as it is presented to this office concerning the necessary amount of monitoring. Until further notice, the monitoring of the removed groundwater samples shall be done monthly.

6) Following consistency in terms of levels of hydrocarbons in the sampling of the groundwater, Alameda County will lower the required sampling to quarterly intervals.

If you have any questions concerning the above site, please call this office at (510) 271-4320.

Please respond to this letter by April 20, 1992.

Sincerely,

*Brian P. Oliva*

Brian P. Oliva, REHS  
Hazardous Materials Specialist

ARA

cc: Rich Hiett, RWQCB  
Fred Moss, Hydro Environmental Technologies, 2363 Mariner  
Square Drive, #243, Alameda, CA 94501  
Mark Thomson, Alameda Co, DA's office.  
EBMUD

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



ROSIA

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

September 13, 1991

Mr. Ho Park  
B P Oil Company  
1541 Park Street  
Alameda, CA 94501

**SECOND NOTICE OF VIOLATION**

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks  
at BP Oil Company Facility #11266, 1541 Park Street,  
Alameda, California 94501**

Dear Mr. Park:

On July 16, 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 underground storage tanks 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 2711, Title 23, CCR and Section 25286 (c) of H&SC - Three sets of tank permit applications were submitted to our office but bear conflicting information regarding the underground storage tanks (specifically piping information) at the referenced establishment. The most recent application states that the facility operates only three double-walled product tanks.

You are required to submit correctly completed, updated underground storage tank permit applications to our office. Blank copies of these application forms were provided during the time of inspection. One Part A application must be completed per facility. One Part B application must be completed per tank. Also, submit piping as-builts determining the type of construction, i.e. single-walled, double-walled, etc.;



1541 Park St., Alameda  
September 13, 1991  
Page 2 of 7

2) Section 2635(b)6 & 7, CCR and Section 25289(b) of H&C - No initial tank and piping tightness/leak detection test result was submitted to our office. Please provide us with a copy of test results;

3) Section 2632(d)(1) or 2634(d)(2), Title 23, CCR - 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 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.



1541 Park St., Alameda  
September 13, 1991  
Page 3 of 7

The following are comments for 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 Pollulert FD-103 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. Pollulert FD-103, 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

1541 Park St., Alameda  
September 13, 1991  
Page 4 of 7

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:

- 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.
- 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(e)(2) or 2634(c) of Title 23, California Code of Regulations (CCR), whichever is applicable. The following requirements are presented for your reference:

1. Section 2632(e)(2), Title 23, CCR - The spill/leak response plan should demonstrate that any

1541 Park St., Alameda  
September 13, 1991  
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unauthorized release will be removed from the secondary containment system within 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 types (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;

1541 Park St., Alameda  
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- 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.

Please note that copies of the documents requested above and other related tank/pipe integrity records shall be maintained on-site for at least three (3) years.

Submit all the required materials to this office within 10 working days, i.e. no later than September 27, 1991. A followup 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

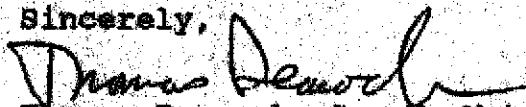


1541 Park St., Alameda  
September 13, 1991  
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Health and Safety Code, of not less than five hundred dollars or more than five thousand dollars for each underground storage tank for each day of violation.

Should you have any questions or concerns regarding the contents of this letter, please don't hesitate to contact Brian Oliva or myself at (510) 271-4320.

Sincerely,



Thomas Peacock, Sr. HazMat Specialist  
Hazardous Materials Division

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  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0318

Certified Mailer #: P 367 604 438

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

July 23, 1991

Mr. Ho Park  
B P Oil Company  
1541 Park Street  
Alameda, CA 94501

**NOTICE OF VIOLATION**

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks  
at BP Oil Company Facility #11266, 1541 Park Street,  
Alameda, California 94501**

Dear Mr. Park:

On July 16, 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 <sup>tank</sup> permit were being met prior to its issuance.

As you are aware, four underground storage tanks 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 2711, Title 23, CCR and Section 25286 (c) of H&SC - Three sets of tank permit applications were submitted to our office but bear conflicting information regarding the underground storage tanks (specifically piping information) at the referenced establishment. The most recent application states that the facility operates only three double-walled product tanks.

You are required to submit correctly completed, updated underground storage tank permit applications to our office. Blank copies of these application forms were provided during the time of inspection. One Part A application must be completed per facility. One Part B application must be completed per tank. Also, submit piping as-builts determining the type of construction, i.e. single-walled, double-walled, etc.;

1541 Park St., Alameda  
July 23, 1991  
Page 2 of 3

- 2) Section 2635(b)6 & 7, CCR and Section 25289(b) of H&SC - No initial tank and piping tightness/leak detection test result was submitted to our office. Please provide us with a copy of test results. Additionally, underground pressurized piping shall be tightness tested annually and results be sent to our office;
- 3) Section 2632(d)(1) or 2634(d)(2), Title 23, CCR - No written routine monitoring plan/procedure has 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;
- 4) Section 2632(d)(2), Title 23, CCR - No written spill/leak response plan has been submitted to this agency. 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.

Also, please note that copies of the documents requested above and other related tank/pipe integrity records shall be maintained on-site for at least three (3) years.

In order for your tanks to be properly permitted and operating legally, you are required to submit all of the required materials to this office within 10 working days, i.e. no later than August 2, 1991. The five-year operating permit will be issued when the above requirements have been rectified. A follow-up inspection will be conducted upon receipt of the required documents.

1541 Park St., Alameda  
July 23, 1991  
Page 3 of 3

Failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code, of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5000) for each underground storage tank for each day of violation.

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

Sincerely,

*Thomas Peacock Sr. for*  
Thomas Peacock, Sr. Hazmat Specialist  
Hazardous Materials Division

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



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



R0318

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

Certified Mailer #: P 062 127 742

July 3, 1990

Mr. Lou Parisi  
BP Oil Company  
2868 Prospect Drive, Suite 360  
Rancho Cordova, California 95670

Re: **Five-Year Permits for Operation of Four Underground Storage Tanks at BP Oil Company Facility #11266, 1541 Park Street, Alameda, California 94501**

Dear Mr. Parisi:

We have recently reviewed and accepted the plans for the replacement of the dispensers - and of associated piping as is needed - for three underground gasoline storage tanks (sized 12,000 gallons, 10,000 gallons, and 10,000 gallons) at the above facility. To obtain five-year operating permits for these tanks and for the 600 gallon waste oil tank also on site, you must submit the following information to our office:

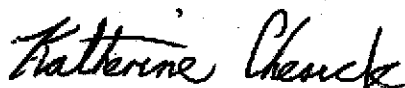
- 1) Tank and piping as-builts for the above described work. As-builts must be submitted within 30 days project completion;
- 2) Correctly completed, up-dated underground storage tank permit applications. Copies of these applications are enclosed for your convenience. One Part A application must be completed per facility. One Part B application must be completed per tank;
- 3) A written routine tank monitoring procedure per Title 23, Section 2632 (d)(1); and
- 4) A written response plan per Title 23, Section 2632 (d)(2).

Please note that underground storage tanks may not be used without a

Page 2 of 2  
Mr. Lou Parisi  
1541 Park Street  
July 3, 1990

permit. Should you have any questions, please feel free to contact me at (415) 271-4320.

Sincerely,



Katherine Chesick,  
Senior Hazardous Materials Specialist

enclosures

cc: W. J. Hollis, Environmental Coordinator, BP Oil Company  
Drew Bardett, Majors Engineering  
Bill Gard, Delta Bay Builders, Inc.  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A. Shahid, Alameda County Environmental Health  
Department  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0318

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

Certified Mailer #:P 062 128 188

May 9, 1990

W. J. Hollis, Environmental Coordinator  
BP Oil Company  
2868 Prospect Drive Suite 360  
Rancho Cordova, California 95670

Re: Contamination at BP Facility #11266, 1541 Park Street,  
Alameda, California

Dear Mr. Hollis:

We have reviewed our file on 1541 Park Street and discovered deficiencies in our file relating to investigation of soil and ground water contamination at this site. Per our records, four tanks were removed from this site in 1987. Soil contamination of up to 3,200 ppm total petroleum hydrocarbons (TPH) was detected at that time. Three ground water monitoring wells were installed and sampled in 1988: ground water samples contained 95 ppm TPH in February, 1988; 14 ppm in October, 1988; and 2.8 ppm in December, 1988.

Our records do not indicate if any contaminated soil was excavated. Our records indicate three additional wells were installed and further quarterly ground water sampling has been conducted; however, we have no reports or results from these sampling episodes.

To facilitate our review of this site and ensure we have complete and accurate site information, please send us copies of all site investigation and remediation reports generated to date. Copies of these reports must also be sent to Lester Feldman at the Regional Water Quality Control Board.

Should you have any questions, please feel free to contact me at (415) 271-4320.

Sincerely,

Katherine A. Chesick  
Senior Hazardous Materials Specialist

cc: Captain Marvin Helms, Alameda Fire Department  
Lester Feldman, S.F. Bay Regional Water Quality Control Board  
Howard Hatayama, State Department of Health Services  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A. Shahid, Alameda County Environmental Health Department  
Files

ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



R0318

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

Certified Mailer #:P 062 128 188

May 9, 1990

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BP Oil Company  
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Sincerely,

Katherine A. Chesick  
Senior Hazardous Materials Specialist

cc: Captain Marvin Helms, Alameda Fire Department  
Lester Feldman, S.F. Bay Regional Water Quality Control Board  
Howard Hatayama, State Department of Health Services  
Gil Jensen, Alameda County District Attorney, Consumer and  
Environmental Protection Division  
Rafat A. Shahid, Alameda County Environmental Health Department  
Files