

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Thursday, December 15, 2016 9:59 AM  
**To:** 'Jacob Levy'  
**Cc:** Ed.C.Ralston@p66.com; Roe, Dilan, Env. Health; Khatri, Paresh, Env. Health  
**Subject:** Responsible Party identification, Fuel leak case RO356 - BP-11117, 7210 Bancroft Ave., Oakland, GeoTracker Global ID T0600100201

Jacob,

Thank you for speaking with me this morning. As I indicated in our phone conversation, all entities meeting the definition of an Responsible Party (RP) are technically equally liable. When multiple RPs are identified, Alameda County Department of Environmental Health (ACDEH) does not distinguish between RPs, leaving it to the RPs to determine the degree to which individual RPs share in the liability.

Prior to distribution my Directive letter dated December 7, 2016, I updated the Notice of Responsibility (NOR). The additions to the NOR RP listing include oil companies which have acquired, merged, or spun off assets that involved operating the former BP station and previous and current fee title owners.

Currently, the environmental liability associated with the operation of the former BP station has been passed to Phillips 66 through a private agreement between the oil companies. ACDEH is in contact with representatives of Phillips 66 and their consultants to address residual contamination at the site and move the case toward closure.

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

Regards,  
Keith Nowell

Keith Nowell PG, CHG  
Hazardous Materials Specialist  
Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6540  
phone: 510 / 567 - 6764  
fax: 510 / 337 - 9335  
email: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)

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<http://www.acgov.org/aceh/lop/ust.htm>