

**Schultz, Robert, Env. Health**

*Robert*

**From:** Schultz, Robert, Env. Health  
**Sent:** Wednesday, April 06, 2005 5:57 PM  
**To:** chriska@bp.com; liz.sewell@conocophillips.com  
**Cc:** Robert\_Horwath@urscorp.com; 'Lynelle\_Onishi@URSCorp.com'; Chan, Barney, Env. Health  
**Subject:** RE: BP# 11109, 4280 Foothill Blvd, Oakland

Mr. Christie and Ms. Sewell:

I have reviewed your request for well abandonment (below) and the October 27, 2004 QMR prepared by URS for the site. The QMR indicates that well MW-2 is a downgradient well. While abandonment of this well may be necessary, I recommend that you review site characterization performed to date at the site and prepare a site conceptual model, identifying any data gaps and proposing the appropriate tasks. Review prior to field mobilization could help to reduce the total number of field iterations and reduce lifecycle costs. At this time, insufficient data has been presented for me to concur with your plan to abandon well MW-2. Pending additional review and presentation of the existing data, well MW-2 needs to be replaced.

Notably, free product is present at the site in well MW-5. Hand-bailing of product from well MW-5 is ongoing; however, these efforts do not appear to have been effective at reducing the occurrence of free product. Please let me know if you have any other plans for addressing contamination at your site. To help improve progress of this site toward closure, ACEH plans to review this case and to coordinate oversight efforts with those of the neighboring Shell and Chevron sites.

Sincerely,  
Bob

\*\*\*\*\*  
Robert W. Schultz, P.G.  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6719 (direct)  
510-337-9335 (facsimile)

-----Original Message-----

**From:** Lynelle\_Onishi@URSCorp.com [mailto:Lynelle\_Onishi@URSCorp.com]  
**Sent:** Monday, March 21, 2005 8:50 AM  
**To:** Schultz, Robert, Env. Health  
**Cc:** chriska@bp.com; Robert\_Horwath@urscorp.com  
**Subject:** RE: BP# 11109, 4280 Foothill Blvd, Oakland

Bob,  
Due to the obstruction within the well casing, overdrilling would ensure the well is properly destroyed.

Lynelle Onishi  
URS Corporation  
1333 Broadway, Suite 800  
Oakland, CA 94612  
(510)874-1758 direct  
(510)874-3268 FAX

"Schultz, Robert,  
Env. Health"  
<robert.schultz@  
<Robert\_Horwath@urscorp.com>  
To: <Lynelle\_Onishi@urscorp.com>  
cc: <chriska@bp.com>,"

**Schultz, Robert, Env. Health**

**From:** Lynelle\_Onishi@URSCorp.com  
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"Schultz, Robert,  
Env. Health"  
<robert.schultz@a  
cgov.org>  
To: <Lynelle\_Onishi@urscorp.com>  
cc: <chriska@bp.com>,  
Subject: RE: BP# 11109, 4280 Foothill  
Blvd, Oakland

03/21/2005 08:42  
AM

Do you think it needs to be overdrilled?

-----Original Message-----

From: Lynelle\_Onishi@URSCorp.com [mailto:Lynelle\_Onishi@URSCorp.com]  
Sent: Monday, March 21, 2005 8:28 AM  
To: Schultz, Robert, Env. Health  
Cc: chriska@bp.com; Robert\_Horwath@URSCorp.com  
Subject: BP# 11109, 4280 Foothill Blvd, Oakland

Bob,  
It was discovered during the recent 1Q05 sampling event that well MW-2 had been damaged, possibly by recent station upgrades.  
The well was discovered with an obstruction at a depth of approximately 13 feet below ground surface (bgs). An attempt was made to try to remove the obstruction, which is thought to be a piece of concrete. As a result, we would like to properly destroy well MW-2. Well MW-2 is upgradient and historically has had concentrations reported that are low to not detected above the laboratory reporting limits. Attached is a copy of the historic concentrations of well MW-2.

Please let me know if you have any questions.

(See attached file: Table 2 11109 3Q04.pdf) (See attached file: Table 1 11109 3Q04.pdf)

Lynelle Onishi  
URS Corporation  
1333 Broadway, Suite 800  
Oakland, CA 94612

**Schultz, Robert, Env. Health**

---

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**Subject:** BP# 11109, 4280 Foothill Blvd, Oakland

**Attachments:** Table 2 11109 3Q04.pdf; Table 1 11109 3Q04.pdf



Table 2 11109 3Q04.pdf (5 KB)...  
Table 1 11109 3Q04.pdf (111 K...

Bob,

It was discovered during the recent 1Q05 sampling event that well MW-2 had been damaged, possibly by recent station upgrades.

The well was discovered with an obstruction at a depth of approximately 13 feet below ground surface (bgs). An attempt was made to try to remove the obstruction, which is thought to be a piece of concrete. As a result, we would like to properly destroy well MW-2. Well MW-2 is upgradient and historically has had concentrations reported that are low to not detected above the laboratory reporting limits. Attached is a copy of the historic concentrations of well MW-2.

Please let me know if you have any questions.

(See attached file: Table 2 11109 3Q04.pdf) (See attached file: Table 1 11109 3Q04.pdf)

Lynelle Onishi  
URS Corporation  
1333 Broadway, Suite 800  
Oakland, CA 94612  
(510)874-1758 direct  
(510)874-3268 FAX

Table 1  
Groundwater Elevation and Analytical Data  
Former BP Station #11109  
4280 Foothill Blvd., Oakland, CA

Well No	Date	P/N P	Foot- note s	TOC (feet)	DTW (feet)	Product Thickness (feet)	GWE (feet)	GRO/ TPH-g (ug/L)	Benzene (ug/L)	Toluene (ug/L)	Ethyl- benzen e (ug/L)	Total Xylenes (ug/L)	MTBE (ug/L)	DO (mg/L)	Lab	pH	DRO/ TPH-d (ug/L)	TOG (ug/L)	HVOC (ug/L)
MW-2	2/5/1990	--	--	41.22	21.90	--	19.31	1300	14	<0.1	9	13	--	--	SUP	--	--	--	--
	2/14/1991	--	d	41.22	21.16	--	20.06	<50	<0.3	<0.3	<0.3	<0.3	--	--	SUP	--	<10000	<5000	51
	5/13/1991	--	e	41.22	21.32	--	19.9	<50	<0.3	<0.3	<0.3	<0.3	--	--	SUP	--	<50	6000	0.5
	7/24/1991	--	--	41.22	22.92	--	18.3	--	--	--	--	--	--	--	--	--	--	--	--
	10/3/1991	--	e	41.22	24.90	--	16.32	<50	<0.3	0.8	<0.3	<0.3	--	--	SUP	--	<50	<5000	0.7
	10/15/1991	--	--	41.22	24.10	--	17.12	--	--	--	--	--	--	--	--	--	--	--	--
	12/4/1991	--	f	41.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/16/1991	--	--	41.22	23.95	--	17.27	--	--	--	--	--	--	--	--	--	--	--	--
	1/6/1992	--	--	41.22	23.30	--	17.92	<50	<0.3	<0.3	<0.3	<0.3	--	--	ANA	--	<50	<5000	ND
	1/22/1992	--	--	41.22	23.14	--	18.08	--	--	--	--	--	--	--	--	--	--	--	--
	1/28/1992	--	--	41.22	22.99	--	18.23	--	--	--	--	--	--	--	--	--	--	--	--
	2/5/1992	--	--	41.22	22.63	--	18.59	--	--	--	--	--	--	--	--	--	--	--	--
	2/12/1992	--	--	41.22	22.04	--	19.18	--	--	--	--	--	--	--	--	--	--	--	--
	2/17/1992	--	--	41.22	20.84	--	20.38	--	--	--	--	--	--	--	--	--	--	--	--
	4/3/1992	--	--	41.22	18.29	--	22.93	--	--	--	--	--	--	--	--	--	--	--	--
	4/8/1992	--	--	41.22	18.86	--	22.36	<50	<0.5	<0.5	<0.5	<0.5	--	--	ANA	--	63	<5000	ND
	4/14/1992	--	--	41.22	19.45	--	21.77	--	--	--	--	--	--	--	--	--	--	--	--
	4/29/1992	--	--	41.22	20.35	--	20.87	--	--	--	--	--	--	--	--	--	--	--	--
	5/7/1992	--	--	41.22	20.84	--	20.38	--	--	--	--	--	--	--	--	--	--	--	--
	7/3/1992	--	--	41.22	22.34	--	18.88	<50	<0.5	<0.5	<0.5	<0.5	--	--	ANA	--	--	--	--
	10/8/1992	--	--	41.22	23.73	--	17.49	<50	<0.5	<0.5	<0.5	<0.5	--	--	ANA	--	--	--	--
	12/31/1992	--	--	41.22	21.12	--	20.1	<50	<0.5	<0.5	<0.5	<0.5	--	--	ANA	--	--	--	--
	4/21/1993	--	g, n	41.22	17.68	--	23.54	<50	<0.5	<0.5	<0.5	<0.5	--	--	PACE	--	<50	<5000	ND
	7/7/1993	--	e, n	41.22	20.30	--	20.92	<50	<0.5	<0.5	<0.5	<0.5	--	--	PACE	--	--	--	1
	9/21/1993	--	n	41.22	21.93	--	19.29	<50	0.9	0.7	0.7	2.6	21.54	--	PACE	--	--	--	--
	12/17/1993	--	--	41.22	21.48	--	19.74	--	--	--	--	--	--	--	--	--	--	--	--
	12/23/1993	--	n	41.22	--	--	--	<50	<0.5	<0.5	<0.5	0.7	--	--	PACE	--	--	--	--

Table 1  
Groundwater Elevation and Analytical Data  
Former BP Station #11109  
4280 Foothill Blvd., Oakland, CA

MW-2	4/7/1994	--	n	41.22	20.25	--	20.97	<50	<0.5	<0.5	<0.5	<0.5	12.2	5.9	PACE	--	--	---	---
	7/6/1994	--	n	41.22	20.59	--	20.63	<50	<0.5	<0.5	<0.5	<0.5	--	3.1	PACE	--	--	---	---
	10/7/1994	--	n	41.22	22.04	--	19.18	<50	<0.5	<0.5	<0.5	<0.5	15.2	2.8	PACE	--	--	---	---
	1/27/1995	--	--	41.22	26.12	--	15.1	<50	<0.5	<0.5	<0.5	<1	--	4.8	ATI	--	440	<5000	---
	3/30/1995	--	--	41.22	12.34	--	28.88	<50	<0.50	<0.50	<0.50	<1.0	--	7.2	ATI	--	--	---	---
	6/20/1995	--	--	41.22	16.42	--	24.8	<50	<0.50	<0.50	<0.50	<1.0	--	6	ATI	--	--	---	---
	10/3/1995	--	--	41.22	20.06	--	21.16	<50	<0.50	<0.50	<0.50	<1.0	<5.0	5.7	ATI	--	--	---	---
	12/6/1995	--	--	41.22	21.31	--	19.91	<50	<0.50	<0.50	<0.50	<1.0	46	5.4	ATI	--	--	---	---
	3/21/1996	--	--	41.22	12.28	--	28.94	<50	<0.5	<1.0	<1.0	<1.0	<1.0	7.4	SPL	--	--	---	---
	6/21/1996	--	--	41.22	13.28	--	27.94	<50	<0.5	<1	<1	<1	<10	7.3	SPL	--	--	---	---
	9/6/1996	--	--	41.22	13.94	--	27.28	--	--	--	--	--	--	--	---	--	--	---	---
	9/9/1996	--	--	41.22	---	--	---	<50	<0.5	<1.0	<1.0	<1.0	<10	7.4	SPL	--	--	---	---
	12/19/1996	--	--	41.22	12.19	--	29.03	<50	<0.5	<1.0	<1.0	<1.0	<10	7.9	SPL	--	--	---	---
	3/17/1997	--	--	41.22	11.59	--	29.63	--	--	--	--	--	--	--	---	--	--	---	---
	8/12/1997	--	--	41.22	13.21	--	28.01	--	--	--	--	--	--	--	---	--	--	---	---
	12/10/1997	--	--	41.22	12.34	--	28.88	--	--	--	--	--	--	--	---	--	--	---	---
	3/12/1998	--	--	41.22	11.04	--	30.18	--	--	--	--	--	--	--	---	--	--	---	---
	6/23/1998	--	--	41.22	11.77	--	29.45	--	--	--	--	--	--	--	---	--	--	---	---
	3/31/1999	--	--	41.22	12.38	--	28.84	--	--	--	--	--	--	--	---	--	--	---	---
	8/25/1999	--	--	41.22	17.72	--	23.5	--	--	--	--	--	--	--	---	--	--	---	---
	3/9/2000	--	--	41.22	11.94	--	29.28	--	--	--	--	--	--	--	---	--	--	---	---
	3/8/2001	--	--	41.22	10.31	--	30.91	--	--	--	--	--	--	--	---	--	--	---	---
	3/8/2002	--	--	41.22	14.35	--	26.87	--	--	--	--	--	--	--	---	--	--	---	---
	3/18/2002	--	--	41.22	13.11	--	28.11	--	--	--	--	--	--	--	---	--	--	---	---
	3/11/2003	--	--	41.22	13.24	--	27.98	--	--	--	--	--	--	--	---	--	--	---	---
	12/09/2003	P	q	41.22	18.58	--	22.64	350	<0.50	<0.50	0.56	2.8	24	--	SEQM	6.2	--	--	--
	03/09/2004	P	--	41.22	12.52	--	28.7	74	<0.50	<0.50	0.83	4.7	27	--	SEQM	6.5	--	--	--
	09/17/2004	P	--	41.22	18.05	--	23.17	59	<0.50	<0.50	<0.50	<0.50	21	--	SEQM	6.3	--	--	--

**Table 1**

**Groundwater Elevation and Analytical Data**

Former BP Station #11109  
4280 Foothill Blvd., Oakland, CA

**ABBREVIATIONS:**

TOC Top of Casing  
DTW Depth to Water relative to the NGVD (1929).  
GWE Groundwater Elevation  
TPH-G Total petroleum hydrocarbons as gasoline  
TPH-D Total petroleum hydrocarbons as diesel  
B Benzene  
T Toluene  
E Ethylbenzene  
X Total xylenes  
MTBE Methyl tert butyl ether  
TOG Total oil and grease  
HVOC Halogenated volatile organic compounds  
DO Dissolved oxygen  
ug/l Micrograms per liter  
ppm Parts per million  
-- Not analyzed/measured/applicable  
< Not detected at or above laboratory reporting limit  
SUP Superior Analytical Laboratory  
ANA Anametrix, Inc.  
PACE Pace, Inc.  
ATI Analytical Technologies, Inc.  
SPL Southern Petroleum Laboratories

- (a) Top of casing elevations surveyed in feet above mean sea level.
- (b) Groundwater elevations adjusted assuming a specific gravity of 0.75 for free product.
- (c) Well destroyed during tank removal in November 1990.
- (d) Methylene chloride.
- (e) 1,2-Dichloroethane.
- (f) Well inaccessible.
- (g) Sample collected from MW-2 for TPH-D analysis received in laboratory 7 days after collection; sample exceeded EPA recommended holding time for TPH-D on a water matrix.
- (h) Blind duplicate.
- (i) Top of casing lowered.
- (j) A copy of the documentation for this data is included in Appendix C of Allisto report 10-014-07-001.
- (k) EPA Methods 8020/8260 used.
- (l) Travel blank.
- (m) Gauge only, along with Shell @ 4411 Foothill Blvd.
- (n) A copy of the documentation for this data is included in the Blaine Tech Services, Inc. report 020308-DW-2. The data for samples taken on April 21, 1993, have been destroyed. No chromatograms could be located for the samples taken on:  
July 7, 1993, for well MW-2 and TB; September 21, 1993, for all wells MW-3, MW-4, MW-6, MW-7, MW-8, MW-9,  
the DUP and TB; December 23, 1993, for wells MW-2 and MW-3; and July 6, 1994, for wells MW-2, MW-4, MW-6, and MW-9.
- (o) Please note that beginning in the Fourth Quarter 2003, the laboratory modified the reported analyte list. Total Petroleum Hydrocarbons as Gasoline (TPHg) has been changed to Gasoline Range Organics (GRO). The resulting data may be impacted by the potential inclusion of non-TPHg analytes within the requested fuel range resulting in a higher concentration being reported.

Source: The data within this table collected prior to June 2002 was provided to URS by RM and their previous consultants.  
URS has not verified the accuracy of this information

Table 2  
 Fuel Additives Analytical Data  
 Former BP Station #11109  
 4280 Foothill Blvd., Oakland, CA

Well No	Date	Ethanol (ug/L)	TBA (ug/L)	MTBE (ug/L)	DIPE (ug/L)	ETBE (ug/L)	TAME (ug/L)	1,2 DCA (ug/L)	EDB (ug/L)
MW-2	12/09/2003	<100	<20	24	<0.50	<0.50	<0.50	--	--
	03/09/2004	<100	<20	27	<0.50	<0.50	<0.50	<0.50	<0.50
	09/17/2004	<100	<20	21	<0.50	<0.50	<0.50	<0.50	<0.50

ABBREVIATIONS AND SYMBOLS:

TBA = tert-Butyl alcohol

MTBE = Methyl tert-butyl ether

DIPE = Di-isopropyl ether

ETBE = Ethyl tert butyl ether

TAME = tert-Amyl methyl ether

1,2-DCA = 1,2-Dichloroethane

EDB = 1,2-Dibromoethane

ug/L = micrograms per liter

< = Not detected at or above the laboratory reporting limit

-- = Data not available, not analyzed, or not applicable

NOTES:

All fuel oxygenate compounds analyzed using EPA Method 8260B



Atlantic Richfield Company  
(a BP affiliated company)

Atlantic Richfield Company  
4 Centerpointe Drive, Room 172  
La Palma, CA 90623-1066  
Phone: (714) 670-5303

Alameda County  
AUG 25 2004  
Environmental Health

August 13, 2004

Mr. Robert Shultz  
Alameda County Environmental Health  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502

RE: BP Heritage Sites Environmental Project Responsibility

Dear Mr. Shultz:

The purpose of this letter is to inform you of the recent reorganization of Atlantic Richfield Company's (RM) environmental staff that manages retail facility environmental efforts in Northern California. Former BP retail sites 11102, 11104, 11107, 11109, 11117, 11120, 11126, 11132, 11133, 11266 and 11270 will now be managed by myself. Atlantic Richfield Company heritage sites will continue to be managed by Paul Supple. Please direct all correspondence for retail environmental issues regarding these sites to me at the following address:

Kyle Christie  
Atlantic Richfield Company  
4 Centerpointe Drive, Room 172  
La Palma, CA 90623-1066

I look forward to working closely with you on environmental issues affecting these projects and would appreciate meeting with you to discuss any of these projects at your convenience. Please feel free to call me at (714) 670-5303 with any questions. I can also be reached via email at [chriska@bp.com](mailto:chriska@bp.com).

Sincerely,

Kyle Christie  
Environmental Business Manager  
Remediation Management

cc: Liz Sewell, ConocoPhillips



ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



August 10, 1999  
StID #102

Mr. Scott Hooton  
BP Exploration & Oil Inc.  
295 SW 41<sup>st</sup> St., Bld. 13, STE N  
Renton, WA 98055-4931

ENVIRONMENTAL HEALTH SERVICES

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

**Re: Former BP Oil # 11109, 4280 Foothill Blvd., Oakland CA 94601**

Dear Mr. Hooton:

This letter reflects our recent conversation and the review of the second quarter 1999 monitoring event at the above former BP station. As you will recall, I was evaluating the Chevron claim that off-site sources of gasoline, BTEX and MTBE may be impacting their site. Both the former BP and Shell stations were, therefore, indirectly implicated. Chevron suggested this since their recent addition of oxygen releasing compound socks had shown little affect in reducing petroleum hydrocarbon concentrations in wells C-1, C-2 and C-4. Because of the consistent elevated petroleum concentrations in these Chevron wells and their apparent low dissolved oxygen concentration, I have asked Chevron to consider the addition of more ORC to their site.

I have also approved Shell's work plan to remove groundwater from a tank backfill well and the installation of ORC socks in wells S-1, S-2 and the tank backfill well. I have further requested Shell to verify the depth of the utilities in High St. and determine if there are preferential pathways. The high MTBE in the Shell well S-2 may be a source of MTBE being detected in Chevron wells.

The absence of contamination in BP well MW-3 does not mean that there is no expected contamination in MW-5. Because of the absence of monitoring data in MW-5 and the past presence of free product, I do not agree with your recommendation for annual monitoring of this well. I understand you are going to arrange to sample this well. Please have your laboratory analyze MTBE using a GC/MS method and insure that a reasonable detection limit is obtained if MTBE is not found. I would like to reserve deciding on the monitoring frequency of this well until your sampling results are available. In the meantime, please consider whether remediation from this well is necessary for closure. You may contact me at (510) 567-6765 if you have any questions or comments.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

**C: B. Chan, files**

Mr. P. Briggs, Chevron Products Co., P.O. Box 5004, San Ramon, CA 94583-0804  
Mr. A. Perez, Shell Oil Co. P.O. Box 8080, Martinez, CA 94553  
Mr. D. Dewitt, Tosco Oil Co., 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583  
**Mon4280Foothill**

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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

January 27, 1999  
StID # 102

Mr. Scott Hooten  
BP Oil Co.  
295 SW 41<sup>st</sup> St.  
Renton, WA 98055-4931

**Re: Former BP Oil Site No. 11109, 4280 Foothill Blvd., Oakland CA 94601**

Dear Mr. Hooten:

We have received and reviewed the December 30, 1998 Groundwater Monitoring and Sampling Report for the above site prepared by Alisto Engineering Group. The site conditions remain similar to past, with gasoline contamination present only in a localized area near MW-5. At this time, this sampling and analysis of this well only is appropriate.

Of concern, however, is the historic reporting of MTBE in the groundwater sample from this well. I noticed non-detectable (ND) concentrations reported at quite elevated reporting limits. The most recent event reported a MTBE concentration of <5000 ppb. I spoke to the analytical laboratory and they stated that they can commonly obtain a detection limit twice that of benzene for MTBE. There is a need to obtain the lowest detection limit as possible when analyzing for MTBE because of the health concerns regarding MTBE and the need to illustrate a stable plume prior to recommending site closure. This is not possible when the concentration reported is stated as < a high concentration. Please have all future analysis for MTBE obtain the lowest detection limit possible. As always, MTBE detected should also be confirmed using a GC/MS method.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan  
Hazardous Materials Specialist

C: B. Chan, files

Mr. B. Nagle, Alisto Engineering Group, 1575 Treat Blvd., Suite 201, Walnut Creek,  
CA

MTBE-4280FTHL



**Peter M. Rooney**  
Secretary for  
Environmental  
Protection

# State Water Resources Control Board

**John P. Caffrey, Chairman**



**Pete Wilson**  
Governor

## Division of Clean Water Programs

2014 T Street, Suite 130 • Sacramento, California, 95814 • (916) 227-4539 FAX (916) 227-4530  
Mailing Address: P.O. Box 94212 • Sacramento, California • 94244-2120  
Internet Address: <http://www.swrcb.ca.gov/~cwhome/ulst/fundhome.htm>

86 AUG 13 PM 2:40  
#102  
BC

AUG 11 1998

R.A. (Rita) Miller  
Mobil Oil Corporation  
3700 190th St W -Tpt-2  
Torrance, CA 90509-2929

UNDERGROUND STORAGE TANK CLEANUP FUND, CLAIM NO. 5641, FOR SITE ADDRESS:  
4280 FOOTHILL BLVD, OAKLAND 94601

The State Water Resources Control Board (State Board) is able to issue, pursuant to applicable regulations, the enclosed Letter of Commitment (LOC) in an amount not to exceed \$401,000. This LOC is based upon our review of the corrective action costs you reported to have incurred to date. The LOC may be modified by the State Board.

It is very important that you read the terms and conditions listed in the enclosed LOC. Claims filed with the Underground Storage Tank Cleanup Fund far exceed the funding available and it is very important that you make use of the funding that has been committed to your cleanup in a timely manner.

**Consequently, if you do not submit your first reimbursement request for corrective action costs which you have incurred within ninety (90) calendar days from the date of this letter, your funds will automatically be deobligated. Once deobligated, any future funds for this site will be obligated subject to availability of funds at such time when we receive your reimbursement request.**

You are reminded that you must comply with all regulatory agency time schedules and requirements and you must obtain three bids for any required corrective action. Only corrective action costs *required* by the regulatory agency to protect human health, safety and the environment can be claimed for reimbursement. **Unless waived in writing, you are required to obtain preapproval of costs for all future corrective action work (form enclosed).** If you have any questions on obtaining preapproval of your costs or the three bid requirement, please call David Hallstrom, our Technical Reviewer assigned to claims in your Region, at (916) 227-4519. Failure to obtain preapproval of your future costs may result in the costs not being reimbursed.

The following documents needed to submit your reimbursement request are enclosed:

- "Reimbursement Request Instructions" package. **Retain this package for future reimbursement requests.** These instructions must be followed when seeking reimbursement for corrective action costs incurred after January 1, 1988. Included in the instruction package are samples of completed reimbursement request forms and spreadsheets.
- "Bid Summary Sheet" to list information on bids received which **must be completed and returned.**
- "Reimbursement Request" forms which you **must use to request reimbursement of costs incurred.**

*California Environmental Protection Agency*

- "Spreadsheet" forms which you **must use in conjunction with your reimbursement request.**
- "Claimant Data Record" (Std. Form 204) which **must be completed and returned with your first reimbursement request.**

We continuously review the status of all active claims. If you do not submit a reimbursement request or fail to proceed with due diligence with the cleanup, we will take steps to withdraw your LOC.

If you have any questions regarding the enclosed documents, please contact Anna Torres at (916) 227-4388.

Sincerely,



Dave Deaner, Manager *for*  
UST Cleanup Fund Program

Enclosures

cc: Mr. Thomas Peacock  
Alameda County EHD  
1131 Harbor Bay Pkway, 2nd Fl.  
Alameda, CA 94502-6577





BP OIL

*ROYAL*

ENVIRONMENTAL  
PROTECTION

6-1-97 PM 3:45

BP Oil Company  
Environmental Remediation Management  
295 SW 41st Street  
Renton, Washington 98055-4931  
(425) 251-0667  
Fax No: (425) 251-0736

June 2, 1997

Alameda County Health Care Services Agency  
Attention Mr. Barney Chan  
1131 Harbor Bay Parkway, Room 250  
Alameda, CA 94502-6577

RE: Former BP Oil Site No. 11109  
4280 Foothill Boulevard (at High Street)  
Oakland, CA

*Consider for  
closure*  
*Sand & P program on next*

Dear Mr. Chan:

Enclosed please find 27 May 1997 Groundwater Monitoring and Sampling Report. The report summarizes groundwater monitoring and sampling data obtained since 1990. Upon review of the results reported this quarter, you will note that aromatic petroleum hydrocarbons were detected in three of the wells sampled this quarter (MW-3, MW-5 and MW-7). The highest concentrations were reported for samples obtained from well MW-5, where benzene (1.9 ug/l), toluene (2.4 ug/l) and TPHg (5,500 ug/l) were detected. You will note that MTBE concentrations of 29 ug/l and 28 ug/l were reported.

Based on the data collected during the last seven years, I believe you can agree that:

- the leak has been stopped and ongoing sources, including free product, have been removed or remediated;
- the site has been adequately characterized;
- the dissolved hydrocarbon plume is not migrating;
- no water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted;
- the site presents no significant threat to human health; and,
- the site presents no significant risk to the environment.

Taken in aggregate, I believe that the data supports a determination of "no further action" and a letter of case closure. I will forward a case closure summary form to assist the ACHCSA in responding to this request sometime in the near future. I will assume that further monitoring will not be necessary unless the ACHCSA declines this request for a finding for no further action.

By copy of this letter to Brady Nable at Alisto Engineering Group, please forward a cost estimate to complete the Case Closure Summary Form for the Alameda County Leaking Underground Fuel Storage Tank Program.

Please give me a call if you have any questions, comments or concerns regarding this matter. I can be reached at (206) 251-0689.

Sincerely,



Scott Hooton  
Environmental Remediation Management

attachment

cc: CRWQCB-SFBR, Attention Mr. E. So, 2101 Webster Street, Ste. 500, Oakland,  
CA 94612 (w/attachment)  
site file  
Brady Nagle - Alisto Engineering Group

**BP OIL**

11109-1  
11109-1  
95100-1 11109-1

10426

March 4, 1996

Alameda County Health Care Services Agency  
Attention Mr. Barney Chan  
1131 Harbor Bay Parkway, Room 250  
Alameda, CA 94502-6577

RE: Former BP Oil Site No. 11109  
4280 Foothill Boulevard (at High Street)  
Oakland, CA

Dear Mr. Chan:

Enclosed please find a table summarizing flow and concentration data for a pump & treat remediation system at the above-captioned site. Please note that these summary tables have been reported previously under a permit granted by the East Bay Municipal Utility District. I believe you can agree that it is appropriate to review the operational characteristics of this system, in the context of recently revised guidance<sup>1</sup> from the California Regional Water Quality Control Board, San Francisco Bay Region.

Upon review of the summary data, please note the following:

1. From January 30 1995 to January 31 1996, 238,314 gallons of groundwater were discharged to the sewer. This works out to a little under 0.5 gallons per minute.
2. From January 30 1995 to January 31 1996, 9.6 pounds of petroleum hydrocarbons were removed by pumping groundwater. This works out to about 0.026 pounds of hydrocarbon per day. Since a gallon of gasoline weighs about six pounds, this works out to a little over 1-1/2 gallons of gasoline recovered during 1995.
3. BP will file for reimbursement from the UST fund for costs associated with the operation and maintenance of this pump & treat remediation system. I expect that consulting fees, analytical fees, and discharge fees will total on the order of \$25,000 per annum. Put another way, about \$17,000.00 per gallon of gasoline recovered. I recognize that the costs of operating a pump & treat system does not obviate BP's obligation to perform remediation. However, it also seems that the operation of the system provides little incremental benefit over the reduction in contaminant mass that one would expect from natural attenuation/bioremediation.

<sup>1</sup> January 5, 1996 Memorandum to San Francisco Bay Area Agencies Overseeing UST Cleanups and Other Interested Parties. Subject: Regional Board Supplemental Instructions to State Water Board December 8, 1995, Interim Guidance on Required Cleanup at Low-Risk Fuel Sites.

It seems that the site can be characterized as a "low risk groundwater case". Therefore, a monitoring/natural bioremediation remedial alternative falls within the Regional Boards current guidelines. I will proceed with this approach absent contrary direction from the Alameda County Health Care Services Agency and the Regional Board. If, on the other hand, you believe that there are compelling reasons to do otherwise, please contact me.

Please give me a call if you have any questions, comments or concerns regarding this matter. I can be reached at (206) 251-0689.

Sincerely,



Scott Hooton  
Environmental Remediation Management

attachment

cc: CRWQCB-SFBR, Attention Mr. E. So, 2101 Webster Street, Ste. 500, Oakland,  
CA 94612 (w/attachment)  
site file



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

September 28, 1994  
StID #102

DEPARTMENT OF ENVIRONMENTAL HEALTH

Mr. Scott Hooten  
B.P. Oil Company  
Environmental Resource Management  
Building 13, Suite N  
295 SW 41st St.  
Renton WA 98055-4931

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 HARBOR BAY PARKWAY, 2ND FLOOR  
ALAMEDA, CA 94502-6577

**Re: Request for Technical Reports for Investigation at BP Oil  
Facility #11109, 4280 Foothill Blvd., Oakland CA 94601**

Dear Mr. Hooten:

It has come to my attention that our office was not informed of the start-up of the groundwater treatment system at the above site. Only through recent conversation with Mr. Brady Nagle of Alisto Engineering Group, have I been informed that the groundwater extraction system has been in operation for several months. Please recall my July 27, 1993 letter which requested that the status of the groundwater treatment system be reported in each quarterly monitoring report. In addition, as part of the conditions of your initial work plan proposal, a report indicating the actual area of influence of each extraction well was to be submitted after the start-up of the extraction system.

At this time, our office requests the following reports:

1. Please provide the process flow diagram of the extraction system and a map showing the location and components of the system.
2. Please provide the report which determines the area of influence of each extraction well.
3. Please provide a report which details the amounts of gasoline/dissolved product being removed and having been removed by the extraction system. Include this information on all subsequent monitoring reports.

Please provide the requested documents **within 45 days or by November 15, 1994**. You may contact me at (510) 567-6700 if you have any questions.

Sincerely,

Barney M. Chan, Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
B. Nagle, Alisto, 1777 Oakland Blvd., Suite 200, Walnut  
Creek, CA 94596  
E. Howell, files 5-4280BP

LOP - CHANGE RECORD REQUEST FORM

printed:  
07/18/94

Mark Out What Needs Changing and Hand to LOP Data Entry  
(Name/Address changes go to Annual Programs Data Entry)

AGENCY # : 10000      SOURCE OF FUNDS: F      SUBSTANCE: 8006619  
StID : 102  
SITE NAME: High Street BP Oil Fac. #11109      DATE REPORTED : 07/17/90  
ADDRESS : 4280 Foothill Blvd      DATE CONFIRMED:  
CITY/ZIP : Oakland      94601      MULTIPLE RPs : Y

SITE STATUS

CASE TYPE: S      CONTRACT STATUS: 4      PRIOR CODE:      EMERGENCY RESP:  
RP SEARCH: S      DATE COMPLETED: 04/06/92  
PRELIMINARY ASMNT: U      DATE UNDERWAY:      DATE COMPLETED:  
REM INVESTIGATION:      DATE UNDERWAY:      DATE COMPLETED:  
REMEDIAL ACTION:      DATE UNDERWAY:      DATE COMPLETED:  
POST REMED ACT MON:      DATE UNDERWAY:      DATE COMPLETED:

ENFORCEMENT ACTION TYPE: 1      DATE ENFORCEMENT ACTION TAKEN: 11/04/92  
LUFT FIELD MANUAL CONSID: 2HSCAW  
CASE CLOSED:      DATE CASE CLOSED:  
DATE EXCAVATION STARTED :      REMEDIAL ACTIONS TAKEN:

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: S. Hooten  
COMPANY NAME: British Petroleum  
ADDRESS: 295 SW - 41st St., Ste N  
CITY/STATE: Renton WA 98055

RP#2-CONTACT NAME: Mr. Steve Mahoney  
COMPANY NAME: N/a  
ADDRESS: 30 Northwest St.  
CITY/STATE: Yerlinton, N V 89447

INSPECTOR VERIFICATION:

NAME \_\_\_\_\_ SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

DATA ENTRY INPUT:

Name/Address Changes Only      Case Progress Changes

ANPPGMS \_\_\_\_\_ LOP \_\_\_\_\_ DATE \_\_\_\_\_      LOP \_\_\_\_\_ DATE \_\_\_\_\_

*update changed.*

INVOICE FOR OVERSIGHT COSTS

fin510a  
<< mrp:1 >>

Send Payment to: State Water Resources Control Board  
Underground Storage Tank Local Oversight Program  
PO Box 944212  
Sacramento, CA 94244-2120

Bill Date:  
05/26/94

Local Agency: COUNTY OF ALAMEDA

Site Location:

SITE # 102

BRITISH OIL - LRM  
S HOOTEN  
16400 CENTER PKY S 301  
TUKWILA, WA 98188

HIGH STREET BP OIL FAC 11109  
4280 FOOTHILL BLVD  
OAKLAND, CA  
94601

*295 SW 41st Street  
Renton, WA 98055*

*Per RP*

Total previously billed	\$ 1,835.30
Payment(s) received as of 07/19/93	\$ 1,377.68
**New Charges - Billing Period: 07/01/93 through 12/31/93	\$ 165.48

Total amount due: \$ 623.10

FUND: F

State Health and Safety Code Sections 25297.1 and 25360 and Title 42 of the United States Code Section 6991b(h)(6) require recovery of costs associated with the local oversight program. When your site was put in the local oversight program, you received a letter explaining that the State Water Resources Control Board (State Board) would bill you for public costs of cleanup oversight.

This bill includes site specific and program management charges. Site specific charges directly relate to your site. Examples are sampling for soil and ground water contamination, site inspections, and reviewing reports and workplans. A description of activity codes follows the itemized charges. Program management includes other costs associated with program operation. Such costs may include: space rental, office services and supplies, purchase of sampling equipment, training and the salary and benefits of support personnel (i.e., clerical staff, accountant, program supervisor). Program management charges are calculated at not more than 50 percent of site specific charges. The exact rate is shown on the last page of your bill.

If you received an invoice for a previous billing period, those charges are shown as "Total Previously Billed". Any payments you made on the previous billing are shown as "Payment Received". The total of any unpaid previous balance plus new charges is shown as "Total Amount Due".

\*\* See itemized list of new charges on next page(s).

FOR INFORMATION CALL: LORI CASIAS

(916) 227-4325

-----cut on this line-----  
Return this part with your check made payable to SWRCB. Use the enclosed envelope and send to the address above.

Local Agency: COUNTY OF ALAMEDA

Site #: 102  
Site Location:

HIGH STREET BP OIL FAC 11109  
4280 FOOTHILL BLVD  
OAKLAND, CA  
94601

7-8-94

Post-It™ brand fax transmittal memo 7571 # of pages 1

To: <u>Tom Peacock</u>	From: <u>Lori Casias</u>
Co.	Co.
Dept.	Phone #
Fax # <u>510-337-9335</u>	Fax #

Total amount due: \$ 623.10

Enter amount paid: \$ \_\_\_\_\_

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

May 6, 1994

Mr. Mark Miller  
Chevron USA Products  
2410 Camino Ramon  
San Ramon, CA 94583

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

**Re: Chevron Station # 9-0076**  
**4265 Foothill Blvd., Oakland 94601**  
**StID # 103**

Mr. Dan Kirk  
Shell Oil Company  
P. O. Box 5278  
Concord, CA 94520

**Re: Shell Station**  
**4411 Foothill Blvd., Oakland 94601**  
**StID # 113**

Mr. Scott Hooten  
British Petroleum Oil Company  
Environmental Resources Management  
295 S. W. 41st St.  
Building 13, Suite N  
Renton, WA

**Re: BP Station # 11109**  
**4280 Foothill Blvd., Oakland 94601**  
**StID # 102**

Dear Sirs:

As part of your on-going investigation of petroleum fuel releases from your respective active underground storage tanks, each of you have been monitoring your wells for some time, some of you, much longer time than others. It has come to the concerned parties attention that a co-operative approach will be necessary to address the investigatin/remediation of these sites. It may prove more productive to look at these sites in a collective fashion and then investigate the most appropriate remedial approaches. The purpose of this letter is to come to some common decision as to what the short and long term outlook for these sites will be, ie when the data collection phase will conclude, when a joint feasibility study will be performed and what and when additional work must be done.

Mssrs. Kirk, Miller and Hooten  
May 9, 1994  
StID #s 102, 103, 113  
Page 3.

Of course, each service station may choose to handle their site individually, but it appears that at least Chevron and Shell have been working together. I propose a meeting at the County's office with those parties interested in working jointly.

Please inform our office in writing within 30 days or by June 6, 1994 if you are willing to meet jointly to discuss the above concerns. Once the participants have been identified, I will solicit an agenda from each party and settle on an agreeable date for meeting(s).

You may contact me at (510) 271-4530 if you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
K. Graves, RWQCB  
E. Howell, files

1-Jtmtg

LOP - CHANGE RECORD REQUEST FORM

printed:  
06/21/93

Mark Out What Needs Changing and Hand to LOP Data Entry  
(Name/Address changes go to Annual Programs Data Entry)

AGENCY # : 10000                      SOURCE OF FUNDS: F                      SUBSTANCE: 8006619  
 StID : 102  
 SITE NAME: High Street BP Oil Fac. #11109                      DATE REPORTED : 07/17/90  
 ADDRESS : 4280 Foothill Blvd.                      DATE CONFIRMED:  
 CITY/ZIP : Oakland                      94601                      MULTIPLE RPs : Y

SITE STATUS

CASE TYPE: S                      CONTRACT STATUS: 4                      EMERGENCY RESP:  
 RP SEARCH: S                      DATE COMPLETED: 04/06/92  
 PRELIMINARY ASMNT: U                      DATE UNDERWAY:                      DATE COMPLETED:  
 REM INVESTIGATION:                      DATE UNDERWAY:                      DATE COMPLETED:  
 REMEDIAL ACTION:                      DATE UNDERWAY:                      DATE COMPLETED:  
 POST REMED ACT MON:                      DATE UNDERWAY:                      DATE COMPLETED:  
 ENFORCEMENT ACTION TYPE: 1                      DATE ENFORCEMENT ACTION TAKEN: 11/04/92  
 LUFT FIELD MANUAL CONSID: 2HSCAW  
 CASE CLOSED:                      DATE CASE CLOSED:  
 DATE EXCAVATION STARTED :                      REMEDIAL ACTIONS TAKEN:

RESPONSIBLE PARTY INFORMATION

RP#1-CONTACT NAME: Stephen Mahoney  
 COMPANY NAME: n/a  
 ADDRESS: 30 Northwest St  
 CITY/STATE: Yerington, Nv 89447

RP#2-CONTACT NAME: Scott Hooton  
 COMPANY NAME: B P Oil Co.  
 ADDRESS: 16400 S Center Pkwy #301  
 CITY/STATE: Tukwila W A 98188

INSPECTOR VERIFICATION:			
NAME	SIGNATURE	DATE	
DATA ENTRY INPUT:			
Name/Address Changes Only		Case Progress Changes	
ANNPMS	LOP	DATE	LOP      DATE

**BP OIL**

BP Oil Company  
16400 Southcenter Parkway, Suite 301  
Tukwila, Washington 98188  
(206) 575-4077

February 2, 1993

Alameda County Health Care Services Agency  
Attention Mr. Barney M. Chan - Hazardous Materials Specialist  
80 Swan Way, Room 200  
Oakland, CA 94621

RE: **BP Oil Site No. 11109**  
**4280 Foothill Blvd.**  
**Oakland, CA 94601**  
**St ID # 102**

Dear Mr. Chan:

I am writing in response to your January 30, 1993 letter, which among other purposes, served to clarify concerns raised in your January 8, 1993 letter. You will recall that the January 8, 1993 letter was written because you did not receive my October 21, 1992 letter, which I transmitted via telecopier when I was informed that you had not received it.

I have reviewed your January 8, 1993 letter, and offer the following responses to item numbers 3-5 as requested in your January 30, 1993 letter:

3. By way of cc, Mr. Mark Miller is being informed in an attempt to resolve this issue between Chevron and BP without legal intervention.

Response: I have discussed this matter with Mr. Miller, and he agrees that more information should be obtained to assess the release. It is my understanding that Chevron is not contemplating any legal action against BP.

4. Please comment as to whether you feel monthly groundwater elevations would help to clarify the gradient at this site or do you think that the gradient has been defined adequately? Certainly, gradient determination will be a key in determining the responsibility for contaminated areas of questionable source.

Response: Prior groundwater elevation measurements have consistently shown that the direction of groundwater flow at the BP station is to the Northwest, and nearly 90-degrees opposed to the flow direction at the Chevron station. Accordingly, we believe that the gradient at

*Please provide evidence of this request.*

the BP site has been adequately defined. We believe that additional exploratory borings may provide a better understanding of the areal hydrostratigraphy, as well as the transport and fate of releases from both facilities. Indeed, we attempted to secure permission to drill in the street for this purpose, however, our request was denied by the City of Oakland.

5. Your December 30, 1992 cover letter to the groundwater monitoring report states that you have initiated product recovery in MW-5. Please describe how this is being done. Please include the amounts of free product recovered, quarterly and total, on your future monitoring reports. At what frequency is the product recovery being performed?

Response: In December, 1992, a product recovery canister was installed in MW-5. The product recovery canister allows any present phased-product to continuously drain through an oleophilic filter, into a two-litre receptacle. The product recovery canister is inspected every two weeks, and emptied. As a result of the relatively-low permeability of soils at the site, less than one-gallon has been produced and recovered from the well. By copy of this letter, I ask that Alisto provide an update of product recovery efforts in future quarterly monitoring reports.

I have reviewed your January 20, 1993 letter, and offer the following responses to item numbers 2 and 3 as you have requested in your letter:

2. I assume the groundwater treatment system, which was initially projected to be installed by 1992 is awaiting additional permit(s) approval before its construction. Please specify which permit(s) have not received approval. Our office is not part of the permit approval process and therefore cannot expedite this procedure. Please inform me if you have been requested by any agency for the County's input on this matter and our office will gladly reply.

Response: We have not as yet received a discharge permit from the EBMUD, however, we do not expect this to slow-down construction. Generally, we have found that permits issued by the City of Oakland require the most time to obtain. While I recognize that the City rarely requests input from the Alameda County Health Care Services Agency (ACHCSA) in such matters, it is frustrating that the City apparently does not share the sense of urgency in these matters as we, and the ACHCSA, do. We believe that it is appropriate for the City and the ACHCSA to draft a Memorandum of Understanding in order to expedite the processing of these permit applications.

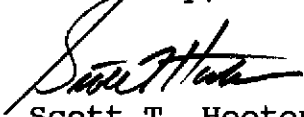


3. The July and November 1992 monitoring reports did not include chlorinated solvents for MW-2 as requested in my October 7, 1992 letter. Please provide reasons for eliminating this parameter from the analyses. In addition, per my October 7, letter, you were requested to provide the status of the implementation of the treatment system in all following monitoring reports. This information was not included in these reports.

Response: Groundwater samples collected from MW-2, in the vicinity of the used-oil tank, were last analyzed for chlorinated solvents during the April, 1992 sampling event. No chlorinated solvents were detected at that time. During the previous four quarters, 1,2-Dichloroethane was detected at concentrations of 0.7 and 0.5 parts per billion ((ppb) the detection limit is 0.5 ppb). As a result, this analysis was not performed during subsequent sampling events. By copy of this letter, I request that Alisto provide an update on the status of the implementation of the treatment system in future quarterly monitoring reports.

Should you have any questions or comments on this, or any other matter, please do not hesitate to write or call.

Sincerely,



Scott T. Hooton  
Environmental Resources Management

cc: site file  
B. Nagle - Alisto

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



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

January 20, 1993  
StID # 102

Mr. Scott Hooton  
B.P. Oil Company  
16400 South Center Parkway, Suite 301  
Tukwila, WA 98188

Re: **Clarification of Correspondence for BP Oil Site No. 11109,  
4280 Foothill Blvd., Oakland 94601**

Dear Mr. Hooton:

This letter serves to summarize our January 14, 1993 phone conversation regarding my October 7, 1992 letter. As you recall, our office had not received a response to this letter though your October 21, 1992 letter was sent to my attention. I have since received a faxed copy of this letter on January 14, 1993. You requested the District Attorney office be made aware that your response to the October letter was timely and not beyond the requested response date. This letter serves to do this.

Our office has read your response and has the following comments to your October 21, 1992 letter:

1. Enclosed please find a copy of Mr. Oliva's letter conditionally approving the groundwater treatment system. You also requested a copy of the minutes of the referenced 6/26/92 meeting. Please be aware that our office took no minutes of this meeting and either your consultant or Mr. DeSantis' notes should be inspected for the proceedings of this meeting.
2. I assume the groundwater treatment system, which was initially projected to be installed by 1992 is awaiting additional permit(s) approval before its construction. Please specify which permit(s) have not received approval. Our office is not part of the permit approval process and therefore cannot expedite this procedure. Please inform me if you have been requested by any agency for the County's input on this matter and our office will gladly reply.
3. The July and November 1992 monitoring reports did not include chlorinated solvents for MW-2 as requested in my October 7, 1992 letter. Please provide reasoning for eliminating this parameter from the analyses. In addition, per my October 7 letter, you were requested to provide a status of the implementation of the treatment system in all following monitoring reports. This information was not included in these reports.

Mr. Scott Hooton  
StID # 102  
4280 Footihill Blvd.  
January 20, 1993  
Page 2.

Lastly, items numbers 3-5 of my January 8, 1993 should also be addressed. You may respond to this letter and the January 8, 1993 letter as one or independently, as you wish.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: G. Jensen, Alameda County District Attorney Office  
R. Hiatt, RWQCB  
B. Nagle, Alisto Engineering Group, 1000 Burnett Ave.,  
Suite 420, Concord, CA 94520  
B. Oliva, ACHCSA  
~~E. Howell~~, files *EBH*

2-4280bp

P 869 631 748



**Certified Mail Receipt**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to	
Street & No.	
P.O., State & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1990

ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Certified Mailer # *P 869 531 748*

January 8, 1993  
StID # 102

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

Mr. Scott Hooton  
B. P. Oil Company  
16400 South Center Parkway, Suite 301  
Tukwila, WA 98188

Re: **Request for Status Update for BP Oil Facility # 11109,  
4280 Foothill Blvd., Oakland CA 94601**

Dear Mr. Hooton:

It appears that you may not have received my October 7, 1992 letter which requested clarification on a number of items discussed during the June 26, 1992 meeting with Mr. Peter De Santis. Enclosed please find a copy of this letter. As you can see, this letter requested written response within 45 days of receipt of this letter, which has obviously passed. Since this meeting, our office has received the quarterly monitoring reports for groundwater samplings occurring in July and November 1992. Some of the items mentioned in the October 1992 letter have since been addressed, however, I would like to reiterate the concerns which our office still has.

1. Please provide a timetable which states realistic dates for the implementation of the proposed groundwater treatment system. The status of the implementation of this system should be given in all subsequent monitoring reports.
2. Chlorinated hydrocarbons was not analyzed on MW-2 in either July and November quarterly monitorings. Please resume the analysis for this parameter for this well in all subsequent groundwater samplings.
3. Please state how the extent of the groundwater contamination will be determined. As you are aware, the groundwater plume downgradient to MW-5, where floating product is currently being found, has yet to be determined. It may be presumptuous to assume that monitoring well MW-8 is the downgradient well to this area. As mentioned in the October 1992 letter, well C-1 on the Chevron site across the street and potentially downgradient to the BP site, has detected high levels of gasoline and BTEX and Chevron is implicating the BP site as the contaminant source. Mr. DeSantis was requested to consider the installation of additional offsite well(s) to clarify gradient. Are there plans for this further work?

Mr. Scott Hooton  
4280 Foothill Blvd.  
STID # 102  
January 8, 199<sup>3</sup>  
Page 2.

3. By way of cc, Mr. Mark Miller is being informed in an attempt to resolve this issue between Chevron and B.P. without legal intervention.

4. Please comment as to whether you feel monthly groundwater elevations would help to clarify the gradient on this site or do you think that the gradient has been defined adequately? Certainly, gradient direction will be key in determining the responsibility for contaminated areas of questionable source.

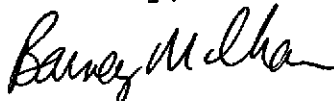
5. Your December 30, 1992 cover letter to the groundwater monitoring report states that you have initiated product recovery in MW-5. Please describe how this is being done. Please include the amounts of free product recovered, quarterly and total, on your future monitoring reports. At what frequency is the product recovery being performed?

Please provide a written response to the above items to our office **within 30 days** of receipt of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested documents may subject British Petroleum to civil liabilities.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

enclosure (Mr. Hooton)

cc: M. Thomson, Alameda County District Attorney Office  
R. Hiatt, RWQCB  
B. Nagle, Alisto Engineering Group, 1000 Burnett Ave., Suite  
420, Concord, CA 94520  
M. Miller, Chevron USA Products Co., P.O. Box 50004, San  
Ramon, CA 94583-0804  
B. Oliva, ACHCSA  
E. Howell, files *EPD*

2-4280FH

11-13-92

EDGAR B. HOWELL III CHIEF  
CONTRACT PROJECT DIRECTOR  
ALAMEDA COUNTY HEALTH CARE SERVICES

Dear Mr Howell,

THE PROPERTY LOCATED AT  
4280 FOOTHILL BLVD., NO LINTON BELONGS  
TO U.S. IT WAS PURCHASED BY  
B.P. OIL CO. ON 7-17-90 IT WAS  
LEASED TO B.P. THE LEASE PROVIDED  
THAT ALL UNDERGROUND MAINTENANCE  
INC. TANKS WAS THE RESPONSIBILITY  
OF B.P. OIL CO.

THIS IS THE SECOND TIME  
I HAVE RESPONDED TO YOUR NOTICE

Sincerely,

Jim Mahoney



BP OIL

BP Oil Company  
16400 Southcenter Parkway, Suite 301  
Tukwila, Washington 98188  
(206) 575-4077

FACSIMILE / TELECOPY TRANSMISSION

DATE: 1/14

TO: Berny Chew 510/569-4757

FROM: Scott Hester

BP OIL COMPANY - NORTHWEST DIVISION OFFICE

NUMBER OF PAGES TO FOLLOW: 3

////// \*\*\*\*\* ////

IN THE EVEN OF AN INCOMPLETE TRANSMISSION  
OR DIFFICULTY IN RECEIVING,

PLEASE CALL:  
(206) 575-4077

OUR FAX NUMBER IS:  
(206) 394-5280

Pauline Peters

33305 First Way

Block B-100

First Way

WA 98003

Job 874-7522

Job 874 8281





BP OIL

BP Oil Company  
18400 Southcenter Parkway, Suite 301  
Tukwila, Washington 98188  
(206) 575-4977

*Jan 10/21*  
*Jan:*  
*Please copy the*  
*attachment for this*  
*letter, and return the*  
*original to the*  
*project f.b. Thank!*

October 21, 1992

Alameda County Health Care Services Agency  
 Attention Mr. Barney M. Chan - Hazardous Materials Specialist  
 Department of Environmental Health  
 UST Local Oversight Program  
 80 Swan Way, Room 200  
 Oakland CA 94621

RE: BP OIL SITE NO. 11109  
 4280 FOOTHILL BLVD.  
 OAKLAND, CA

Dear Mr. Chan:

I am writing in response to your October 7, 1992 letter in which you submitted a formal request for technical reports, and also expressed other concerns. While I have conducted cursory review of the project file, I have not as yet reviewed the matter in great detail. However, I would like to take this opportunity to respond to your concerns.

Just to set the record straight, I was not aware of the June 26, 1992 meeting with Mr. DeSantis and his consultant until I read your letter this morning. Nor did I locate a copy of Mr. Oliva's June 2, 1992 letter of conditional approval. Please send me a copy of the meeting minutes as well as a copy of Mr. Oliva's letter. I will be happy to respond as appropriate.

1. You stated that during the 6/26/92 meeting, Mr. DeSantis was speaking optimistically when he mentioned that the groundwater system was to be initiated "late summer 92." You should note that we submitted our permit applications on June 5, 1992, received the building construction permit on August 15, 1992 and our Bay Area Air Quality Management District permit on October 1, 1992. Perhaps Mr. DeSantis presumed that the LOP would assist in expediting permit approvals so that we could achieve our joint goal of remediating the site. Evidently, this was not the case.

Permitting constraints aside, you should be aware that we have obtained competitive bids for the installation of the groundwater treatment system. We can now move forward with system installation in general accordance with the schedule described in the approved plan.

2. We previously submitted monitoring data for the June

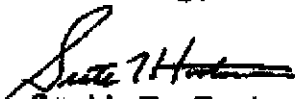
sampling event to Mr. Oliva on September 11, 1992. For your convenience, I have attached a copy of that submittal. I understand that our consultant is currently preparing a report with the most recent monitoring data.

3 & 4 I will take your suggestions under advisement. My initial impression, however, is that space limitations and local hydrogeologic conditions are not well suited for additional assessment. Perhaps our efforts should be focussed on cleaning up the release rather than further study.

5. I have asked our consultant to obtain chemical data from Chevron for inclusion in the next monitoring report. I will be in a better position to evaluate your hypotheses upon review of all of the data.

In closing, I would like to say that I look forward to working with you to resolve this matter. As always, if you have any further questions, comments or concerns, do not hesitate to write or give me a call.

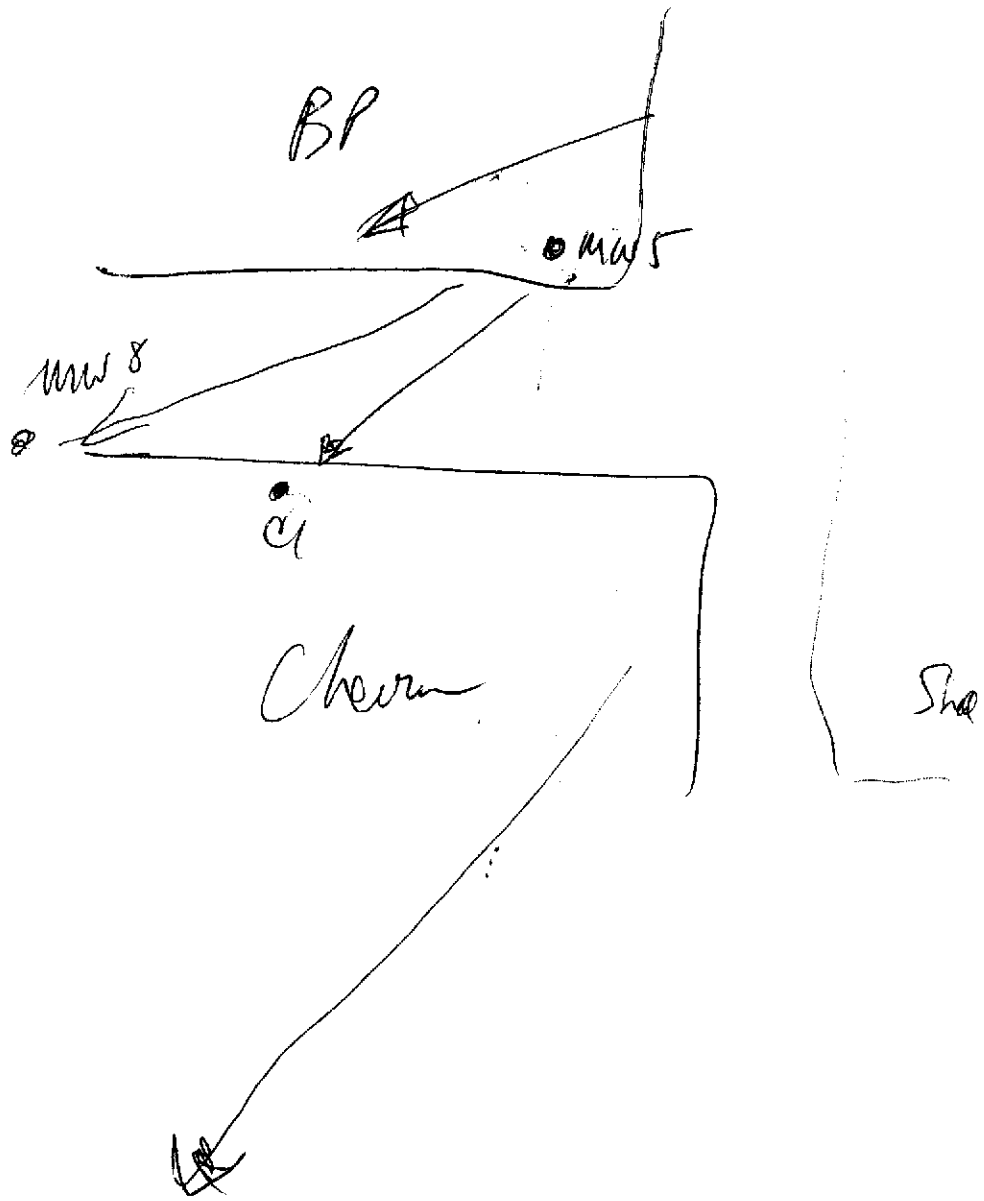
Sincerely,



Scott T. Hooton  
Environmental Resources Management

attachment

cc: site file



ALAMEDA COUNTY  
HEALTH CARE SERVICES  
AGENCY



DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

October 7, 1992  
STID # 102

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

Mr. Scott Hooton  
BP Oil Company  
16400 South Center Parkway, Suite 301  
Tukwila, WA 98188

Re: Request for Status Update for BP Oil Facility # 11109,  
4280 Foothill Blvd., Oakland CA 94601

Dear Mr. Hooton:

I understand that you are the new contact for BP taking over for Mr. Peter DeSantis. As you are aware, representatives of our office met with Mr. DeSantis and his consultant on June 26, 1992 to discuss the various BP sites within Alameda County under our jurisdiction. I am personally, overseeing the above site. Mr. Brian Oliva, of our office, previously gave approval for the installation of the proposed groundwater extraction system as presented in Alton Geoscience's (AG) April 2, 1992 work plan. Please recall his conditional letter of approval dated June 2, 1992 and acknowledge those points of concern in your response to this letter.

I am requesting the submittal of an update on the status of the remediation and monitoring at this station. This update should, in addition to acknowledging the contents of Mr. Oliva's letter, respond to the following County concerns:

1. At the 6-26-92 meeting, perhaps Mr. DeSantis was speaking optimistically, when he stated that he expected the groundwater treatment system to be initiated "late summer 92." Upon closer review of the AG April 2, 1992 work plan, it states it will take approximately 260 days after work plan approval to startup the system. This date would be about 4/93. Please submit a revised time schedule for the startup of the extraction system which is realistic. You should also give the status of implementation of this schedule in all quarterly monitoring reports.
2. Please provide the most current quarterly monitoring report for this site. Our most current data is the contents of the April 3, 1992 AG report. Theoretically, there should be reports for 7/92 and possibly 10/92. Be reminded, you should monitor all wells on and offsite for TPHg and BTEX and additionally MW-2 for chlorinated hydrocarbons.

Mr. Scott Hooton  
BP Station #11109  
STID # 102  
October 7, 1992  
Page 2.

3. As stated in the 4/3/92 report, the extent of petroleum hydrocarbons in the groundwater has not been determined in the southwestern direction ie towards the Chevron station. Because of this, Mr. DeSantis was requested to consider the installation of additional offsite well(s) in that direction. This would also help to explain the varying groundwater gradients being found.

4. As previously mentioned, the gradient at this site is complicated by the occurrence of continuous and discontinuous strata in the east-west and north-south directions respectively. Information from additional offsite wells will help to clarify the actual gradient. It will also help to clarify the source of offsite contamination, if this becomes an issue. Our office highly recommends monthly groundwater elevation readings to help explain ambiguous gradients, such as at this site.

5. Previous reports have alluded to the Chevron station to the southwest of this site as a potential offsite contaminant source. The Chevron site's gradient has been determined to be south-southwesterly and thus would not be expected to be impacting the BP site. On the other hand, the Chevron site is potentially cross-gradient to the BP site and may have been impacted by offsite BP contamination. Be aware that Chevron's monitoring well, C-1, is located near BP's offsite well, MW-8. During a recent monitoring event, exceedingly high concentrations of gasoline and BTEX were found in well, C1. Chevron's implication was that offsite contamination from BP was affecting their site. Your quarterly reports may help to dispell this theory, although I tend to agree with their belief. You should give consideration to the remediation of offsite contamination if this is the case in the area of MW-8.

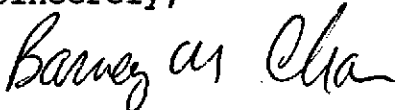
Please respond to these comments in writing to our office within **45 days** of receipt of this letter.

You should consider this a formal request for technical reports pursuant to the California Water Code Section 13267 (b). Failure to submit the requested documents may subject British Petroleum to civil liabilities.

Mr. Scott Hooton  
BP Station #11109  
STID # 102  
October 7, 1992  
Page 3.

You may contact me at (510) 271-4530 should you have any questions.

Sincerely,



Barney M. Chan  
Hazardous Materials Specialist

cc: M. Thomson, Alameda County District Attorney Office  
R. Hiett, RWQCB  
P. Lange, Alton Geoscience, 5870 Stoneridge Drive, Suite 6,  
Pleasanton CA 94566  
B. Oliva, ACHCSA  
B. Howell, files

4280FTHLAdd

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

June 2, 1992

Mr. Peter DeSantis  
BP Oil Company  
2868 Prospect Park Drive  
Rancho Cordova, CA 95670

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

Subject: BP Oil Facility No 11109, 4250 Foothill Blvd., Oakland, CA

Dear Mr. DeSantis,

This office has received and reviewed the "Feasibility Study and Remedial Work Plan", dated April 2, 1992, submitted by Alton Geoscience(AG), your consultant of record. Thank you for having the document prepared for evaluation by this office in a prompt manner.

Upon review of the workplan there are several points in need of clarification prior to the final concurrence by the Alameda County Division of Hazardous Materials:

- 1) This office concurs with the workplan allowing for the installation of monitoring wells in the future if required in a "Vapor Extraction System" as the need is yet to be determined.
- 2) The zone of influence should be carefully determined and reported to this office as soon as the information becomes available.
- 3) Submit all copies of the requisite permits to this office as required by other concerned agencies.
- 4) This office concurs with addressing the "free-floating" product and dissolved phase product at this time. However, in the future it may become necessary to modify the system to remediate any other possible avenues of potential contamination at the site.
- 5) Please provide this office with a workplan that will ensure the QA/QC of the removed and treated groundwater.
- 6) Upon receipt of the addendum to the workplan adequately addressing the issues stated, you may commence construction of the remediation system. Please provide this office with forty-eight (48) hours notice prior to the construction of the proposed system.

7) Please respond to this letter within thirty (30) days.

If you have any questions concerning this or any other of the BP Oil Company sites, please do not hesitate to call our office at (510) 271-4320.

Sincerely,



Brian P. Oliva, REHS  
Hazardous Materials Specialist

cc; Mark Thomson, Alameda County District Attorney's Office  
Rich Hiett, SFBRWQCB  
Jeffery Davies, Alton Geoscience 5870 Stoneridge Drive,  
Suite 6, Pleasanton, CA

*fw*



ALAMEDA COUNTY - ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS DIVISION

MEMORANDUM

DATE: March 23, 1992  
TO : Mark Thomson  
FROM: Brian P. Oliva, HMS  
SUBJ: BP Oil Co Meeting/ Order of sites

---

The sites will be dealt with in the following order:

- SH — 1) BP Oil # 11132 -----3201 35th Ave., Oakland
- JE 2) BP Oil # 11102 -----100 MacArthur, Oakland
- 3) BP Oil # 2486 -----2504 Castro Valley Blvd, C V
- 4) BP Oil # 11117 -----7210 Bancroft, Oakland
- BC 5) BP Oil # 11133 -----2220 98th Ave., Oakland
- SH — 6) BP Oil # 11124 -----3315 High Street, Oakland
- Juliet 7) BP Oil # 11266 -----1541 Park St., Oakland
- SH — 8) BP Oil # 11127 -----M.L.K. Way, Oakland
- EVA — 9) BP Oil # 11116 -----7197 Village Parkway, Dublin
- 10) BP Oil # 11128 -----4707 First St., Livermore
- BC 11) BP Oil # 11109 -----4280 Foothill Blvd, Oakland

The top 11 are Site Remediation cases of sorts

- 12) BP Oil # 11270 -----3255 MecCartney Road, Alameda
- 13) BP Oil # 11107 -----18501 Hesperian, San Lorenzo
- 14) BP Oil # 11126 -----1700 Powell St., Emeryville
- 15) BP Oil # 11122 -----3101 98th Ave., Oakland
- 16) BP Oil # 11105 -----3519 Castro Valley Blvd, C V
- 17) BP Oil # 11106 -----15199 Washington, San Leandro
- Juliet ← 18) BP Oil # 11104 -----1716 Webster St., Alameda
- 19) BP Oil # 11120 -----6400 Dublin Blvd, Dublin
- 20) BP Oil # \_\_\_\_\_ -----1310 Central, Alameda

ALAMEDA COUNTY - ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS DIVISION

MEMORANDUM

DATE: March 11, 1992  
TO : file  
FROM: Brian P. Oliva  
SUBJ: Inspection/Violations at BP Oil Facility # 11109, 4280  
Foothill Blvd, Oakland 94601

On July 19, 1992, Mr. Young Fong from this office inspected this facility.

In July of 1991 a notice of violation was issued requiring documents be forwarded to this office prior to the issuance of permits for the USTs.

In September of 1991 a Second Notice of Violation was sent again requesting documents necessary for the permitting of the USTs.

On inspection of the facility on March 11, 1992, the following violations were noted:

- ✓ 1) There was no updated HMMP submitted, the HMMP was therefore invalid.  
2) There was no permit for the facility, due to the fact that "as built" drawings requested for the subject site.

Note\* The BP Oil Co. sales representative was, according to the operator, at the station the day before relating to him that this department was undertaken inspections of all BP facilities.

The extent of contamination at the facility is not known at the facility as per a December 18, 1989 letter from Mobil Oil Co.

Work plan submitted

F.P.

ALAMEDA COUNTY - ENVIRONMENTAL HEALTH - HAZARDOUS MATERIALS DIVISION

MEMORANDUM

DATE: March 5, 1992  
TO : file  
FROM: Brian P. Oliva  
SUBJ: Inspections/Violations of BP Oil Facility # 11127, 5425 Martin Luther King Way, Oakland, CA 94609

---

On July 24, 1991 Mr. Young Fong from Alameda County inspected the above facility and made the following comments:

- 1) The owner/operator needed to submit the monitoring procedure for the waste oil tank.
- 2) The owner/operator needed to submit a copy of the last servicing of the "Leak Alert" monitoring unit.

On December 4, 1991, this office did a "follow-up" inspection of the facility, including a generator inspection noting the following violations:

- 1) Provide the administering agency with copies of all waste disposal records (manifests) for 1991.
- 2) Provide and maintain copies of all manifests for hazardous wastes generated and removed from the facility.

As of March 5, 1992 no records/information for any of the requested material/items mentioned in the two inspection reports were remitted to the Division of Hazardous Materials.

On March 5, 1992 a third inspection was completed at the facility indicating the following violations:

- 1) The records indicating "fate" of the hazardous wastes removed from the facility were not available.
- 2) Waste oil filters were being improperly disposed of as non-hazardous trash.
- 3) There was no EPA # available to this office. (Note the mechanic did not know what the number was, he was cooperative.)
- 4) There was no hazardous waste labeling on the containers used for the storage of hazardous materials (the anti-freeze).
- 5) There was no documentation for the "Leak Alert" system indicating it had been serviced within a one year period.

- 
- 6) There were no permits for the USTs

**Site Remediation:**

According to the records on the site there were two Unauthorized Releases in 86' and 87'.

In August 1990, BP was requested to investigate by Alameda Co.

Groundwater monitoring has been conducted for the a year by Wiess Associates(WA).

In this time frame, the levels of contamination have increased, from a concentration of 950 ppb TPHg to 1400 ppb TPHg.

The conclusion of the investigation (WA) was that a nearby Chevron Station and an Auto repair shop North and Northeast respectively are the cause of the groundwater problems. However groundwater flow in the area is North/Northwest.??????????????

(7) Provide a plan that will insure the QA/QC of the removed and treated ~~the~~ ground water.

(18) Provide 24 hours notice prior to any work <sup>at</sup> the site

(19) Close respond within 30 days

August 21, 1991

Ms. Cynthia Chapman  
Alameda County Health Agency  
80 Swan Way  
Oakland, California 94621

Subject: Transmittal of Revised Scope of Work  
for Supplemental Site Investigation and  
Remedial Planning Study  
BP Oil Corporation Service Station No. 11109  
4280 Foothill Boulevard  
Oakland, California

Dear Ms. Chapman:

On behalf of BP Oil Corporation, Alton Geoscience is pleased to submit this Revised Scope of Work for Supplemental Site Investigation and Remedial Planning Study, BP Oil Corporation Service Station No. 11109, 4280 Foothill Boulevard, Oakland, California.

Please call us if you have any questions regarding this project.

Respectfully submitted,

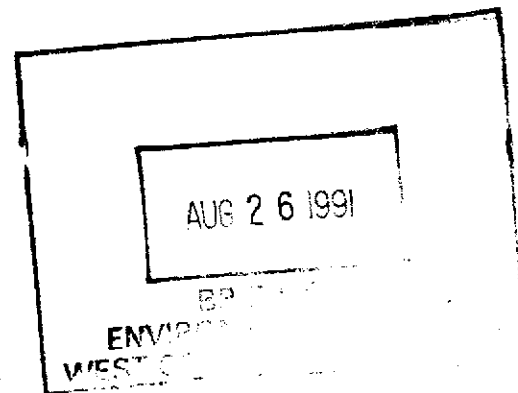
ALTON GEOSCIENCE



Brady Nagle  
Project Manager

Enclosure

cc: Peter DeSantis, BP Oil Corporation (without enclosure)



(6/26/92)

LIST OF BP OIL SITES WITH UGT CLEANUP

<u>STID#</u>	<u>ACHD CONTACT</u>	<u>BP FACILITY#</u>	<u>ADDRESS</u>
3723	Juliet Shin	Station 11104	1716 Webster Street Alameda 94501
624	Juliet Shin	Station 11126	1541 Park Street Alameda 94501
1809	Eva Chu	Station 11128	4707 First Street Livermore 94550
2043	Eva Chu	Station 11116	7197 Village Parkway Dublin 94568
102	Barney Chan	Station 11109	4280 Foothill Blvd. Oakland 94601
3878	Susan Hugo	Station 11132	3201 35th Avenue Oakland 94619
3877	Barney Chan	Station 11133	2220 98th Avenue Oakland 94603
3105	Susan Hugo	Station 11127	5425 Martin Luther King Oakland 94609
1108	Jennifer Eberle	Station 11102	100 MacArthur Blvd. Oakland 94610
1075	Susan Hugo	Station 11124	3315 High Street Oakland 94619
4050	Susan Hugo	Station 11126	1700 Powell Street Emeryville 94608

Mobil  
project

May 89 BP took over Mobil Sites  
Also will be the sampler at all sites this year.

12/14/90

9:15 - 10:00

Primary Piping test at BP 4250 Foothill. Primary piping leaked at two elbows.

2:00 Return to site to check on leaks - they repaired them.

I performed a final inspection on monitoring system on 1/18/91. System checks out O.K.



**ALTON GEOSCIENCE, INC.**

October 3, 1990

Ms. Cynthia Chapman  
Alameda County Health Agency  
80 Swan Way, Room 200  
Oakland, California 94621

*FILE*

OCT - 5 1990  
BP OIL CO.  
ENVIRONMENTAL DEPT.  
WEST COAST REGION OFFICE

30-248

Subject: BP Oil Service Station No. 11109  
4280 Foothill Boulevard, Oakland, California

Dear Ms. Chapman:

Enclosed are copies of the following reports regarding the BP Oil Service Station No. 11109 (formerly the Mobil Oil Service Station No. 10-H69), located at 4280 Foothill Boulevard, Oakland, California.

- Site Investigation Report by Alton Geoscience dated February 16, 1990
- Proposed Scope of Work for Phase II - Supplemental Site Investigation by Alton Geoscience dated August 6, 1990

These copies are being provided to you as per our conversation at the site on September 27, 1990. As we discussed, a revised proposed scope of work based on recent developments will be produced and sent to you under separate cover.

If there are any questions or comments regarding this submittal, please call.

Sincerely,

ALTON GEOSCIENCE, INC.

*Brady Nagle*

Brady Nagle  
Project Geologist

cc: Mr. Peter DeSantis, BP Oil Company

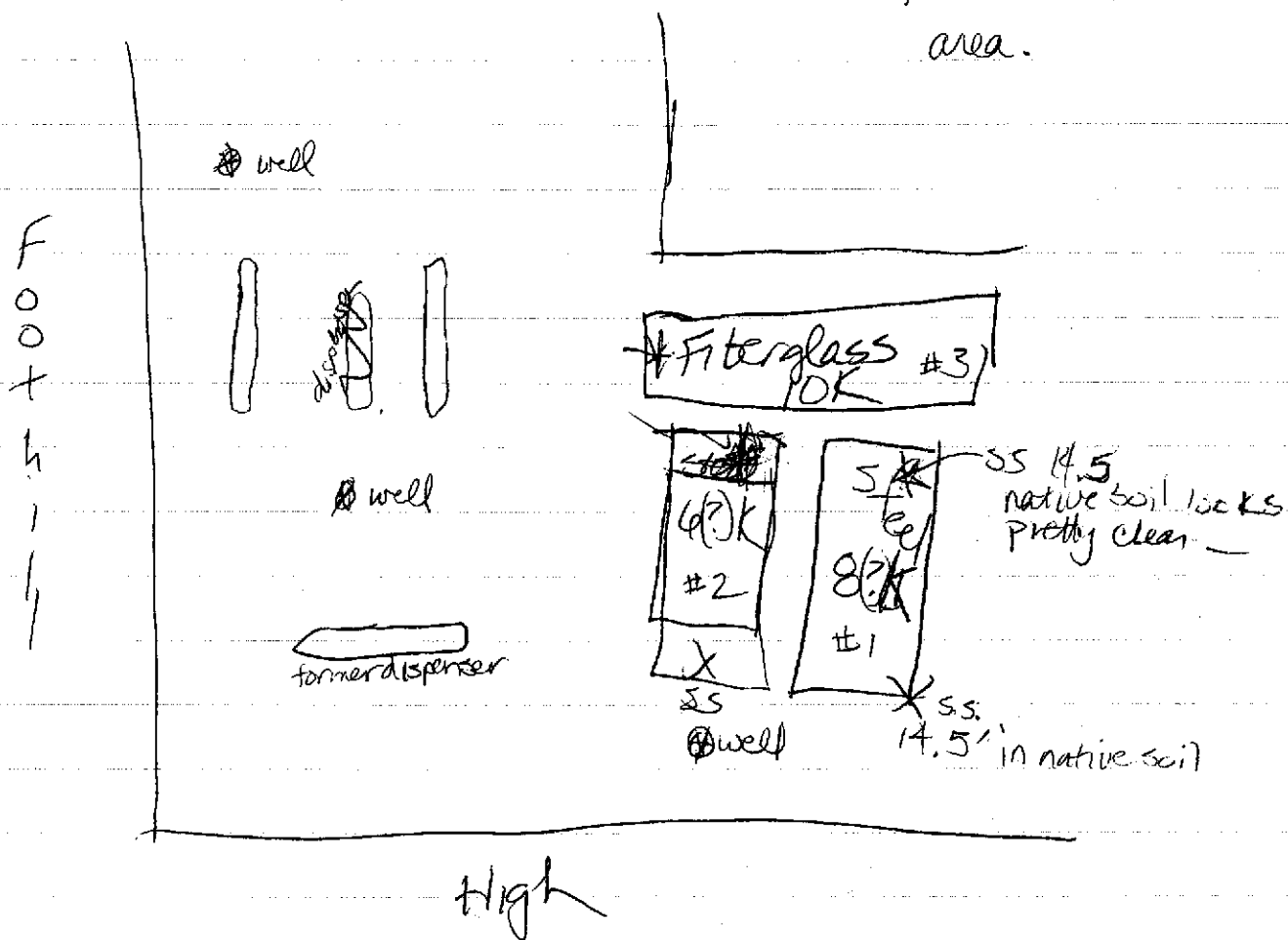
10:45 to 1:30

9/14/90

BP

arrived at site 11:00  
left site at 1:15

- 1) ask about piping excavation
- 2) ask about
- 3) check on new installation area.



3 tanks

2 single walled steel  
1 fiberglass

site smells like gasoline

steel tanks in good shape

obvious soil contamination in the pit  
sand exhibits gray green color

Kaprelian doing soil sampling

Tanks hauled by H&H 4 & 8 on one, 10K on another

using Sequoia

Water present in the pit

Fiberglass tank not in great shape. Not actually leaking but ribs were ~~leaking~~ dripping fluid out. Construction foreman indicated that laminate was coming apart inside the tank.

Pea gravel in the ~~one~~ fiberglass tank fill.

I have some concerns about putting the new tanks in a possibly contaminated hole.

Site has a waste oil tank in the back, and 4 monitoring wells

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY  
DEPARTMENT OF ENVIRONMENTAL HEALTH  
HAZARDOUS MATERIALS DIVISION

80 SWAN WAY, ROOM 200  
OAKLAND, CA 94621  
PHONE NO. 415/271-4320

ACCEPTED

DEPARTMENT OF ENVIRONMENTAL HEALTH  
470 - 27th Street, Third Floor  
Oakland, CA 94612  
Telephone: (415) 874-7237

These plans have been reviewed and found to be acceptable and essentially meet the requirements of State and local health laws. Changes to your plans indicated by this Department are to assure compliance with State and local laws. The project proposed herein is now released for issuance of any required building permits for construction.

One copy of these accepted plans must be on the job and available to all contractors and craftsmen involved with the removal.

Any change or alterations of these plans and specifications must be submitted to this Department and to the Fire and Building Inspection Department to determine if such changes meet the requirements of State and local laws. Notify this Department at least 48 hours prior to the following required inspections:

- Removal of Tank and Piping
- Sampling
- Final Inspection

Issuance of a permit to operate is dependent on plans with accepted plans and all applicable laws and regulations.

THIS IS A PERMANENT RECORD. DO NOT OBTAIN COPIES FROM THIS.

C. Chapman 7/25/90

4568931

\$744.00

6/21/90

Date

UNDERGROUND TANK CLOSURE/MODIFICATION PLANS

1. Business Name BP Oil Company  
Business Owner BP Oil Company
2. Site Address 4280 Foothill Blvd.  
City Oakland Zip 94601 Phone 415)533-1
3. Mailing Address 2862 Prospect Park Dr Ste 360  
City Rancho Cordova Zip 95670 Phone 415)1631-08
4. Land Owner BP Oil Company  
Address 2862 Prospect Park Dr Ste 360 City, State Rancho Cordova zip 95670 CA
5. EPA I.D. No. CAL 000 039 072
6. Contractor Paradise Construction Company  
Address 9220 G Street  
City Oakland, CA 94603 Phone 415)512-551  
License Type BC-8 C61/D23 A C101 259820 EXPI 8/31/91
7. Consultant Tait & Assoc  
Address 7803 Madison Ave, Ste 700  
City Citrus Hts Phone 916)916-9011

8. Contact Person for Investigation

Name Annette Smith/Stan Iverson Title Project Manager  
Phone (415) 916-9011

9. Total No. of Tanks at facility 2

(1 waste oil tank to remain)

10. Have permit applications for all tanks been submitted to this office?  
Yes [X] No [ ]

11. State Registered Hazardous Waste Transporters/Facilities

a) Product/Waste Transporter

Name H & H SHIP SERVICE EPA I.D. No. CAD004771168  
Address 220 CHINA BASIN  
City SAN FRANCISCO State CA zip 94107

b) Rinsate Transporter

Name SAME EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ zip \_\_\_\_\_

c) Tank Transporter

Name SAME EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ zip \_\_\_\_\_

d) Tank Disposal Site

Name \_\_\_\_\_ EPA I.D. No. \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ zip \_\_\_\_\_

e) Contaminated Soil Transporter

Name Oscar Erickson EPA I.D. No. \_\_\_\_\_  
Address 255 Parr Blvd.  
City Richmond State CA zip 94801

12. Sample Collector

Name Marcelo Kaprealian  
 Company Kaprealian Engineering, Inc.  
 Address P.O. Box 913  
 City Bericia state CA zip 94900 Phone (707) 746-691

13. Sampling Information for each tank or area

Tank or Area		Material sampled	Location & Depth
Capacity	Historic Contents (past 5 years)		

14. Have tanks or pipes leaked in the past? Yes  No

If yes, describe. 12-14-87, Unloaded, volume unknown, Mobil Oil Refractor

15. NFPA methods used for rendering tank inert? Yes  No

If yes, describe. GAS FREE TANKS WITH DRY ICE BEFORE REMOVAL PER FIRE DEPARTMENT REQUIREMENTS

An explosion proof combustible gas meter shall be used to verify tank inertness.

16. Laboratories

Name Saguia Analytical Laboratories  
 Address Seaport Center 680 Chesapeake Drive  
 City Redwood City State CA zip 94063  
 State Certification No. \_\_\_\_\_

17. Chemical Methods to be used for Analyzing Samples

Contaminant Sought	EPA, DHS, or Other Sample Preparation Method Number	EPA, DHS, or Other Analysis Number
Soil	EPA 8020	EPA 3550 and 8015
Groundwater	EPA 602 and 6030	EPA 3510 and 8020
(For additional methods see attached)		

18. Submit Site Safety Plan

19. Workman's Compensation: Yes  No [ ]

Copy of Certificate enclosed? Yes [ ] No  ON FILE

Name of Insurer Republic Indemnity Company

20. Plot Plan submitted? Yes  No [ ]

21. Deposit enclosed? Yes  No [ ]

22. Please forward to this office the following information within 60 days after receipt of sample results.

- a) Chain of Custody Sheets
- b) Original Signed Laboratory Reports
- c) TSD to Generator copies of wastes shipped and received
- d) Attachment A summarizing laboratory results

I declare that to the best of my knowledge and belief the statements and information provided above are correct and true. I understand that information in addition to that provided above may be needed in order to obtain an approval from the Department of Environmental Health and that no work is to begin on this project until this plan is approved.

I understand that any changes in design, materials or equipment will void this plan if prior approval is not obtained.

I understand that all work performed during this project will be done in compliance with all applicable OSHA (Occupational Safety and Health Administration) requirements concerning personnel and safety.

I will notify the Department of Environmental Health at least two (2) working days (48 hours) after approval of this closure plan in advance to schedule any required inspections. I understand that site and worker safety are solely the responsibility of the property owner or his agent and that this responsibility is not shared nor assumed by the County of Alameda.

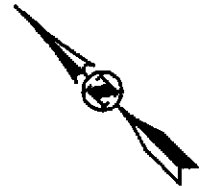
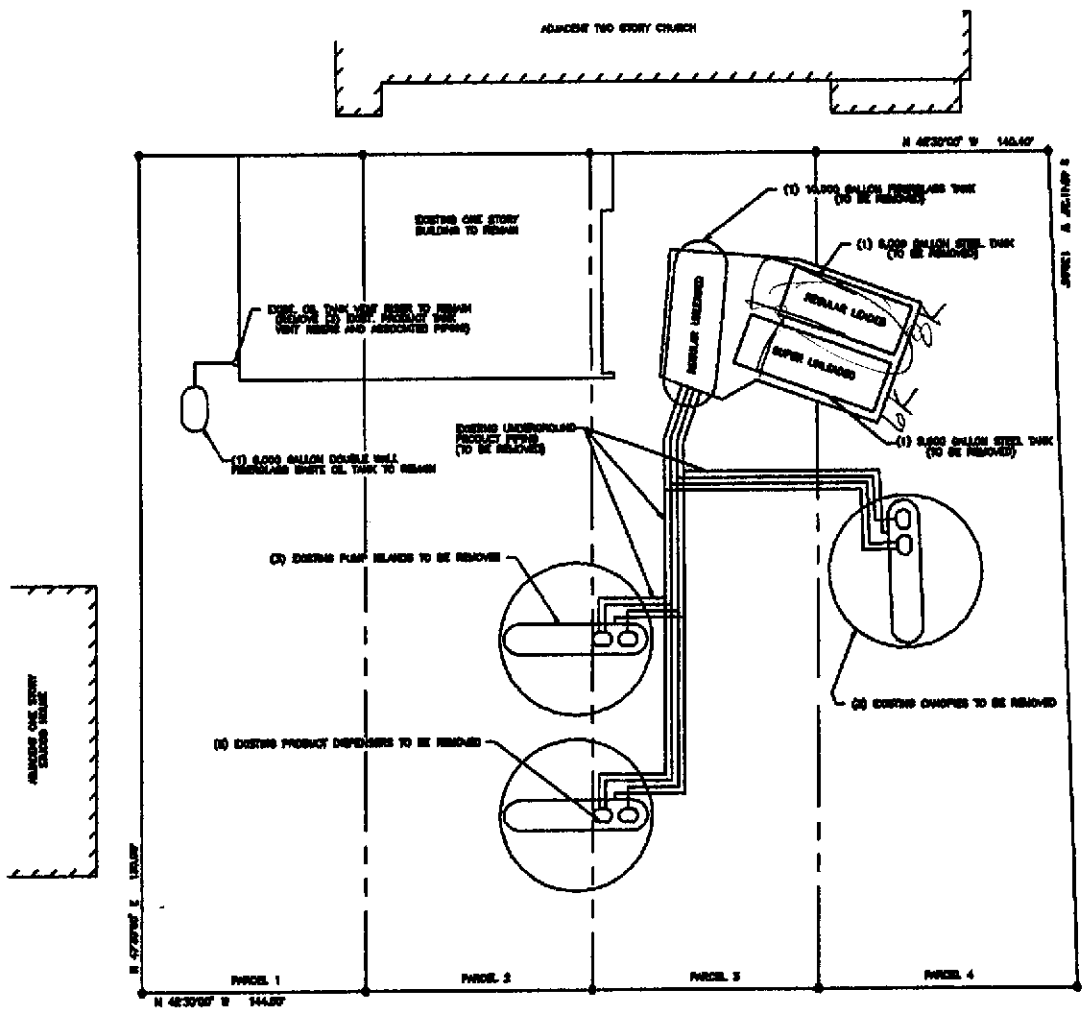
Signature of Contractor

Name (please type) TONY MILLER  
Signature *Anthony Miller*  
Date 7-11-90

Signature of Site Owner or Operator

Name (please type) BRIAN P DUFFY - B P OIL CO.  
Signature *Brian P Duffy*  
Date 7/5/90





HIGH STREET (90.00' R/W)

FOOTHILL BLVD. (70.00' R/W)

BP FACILITY 11109  
 4280 FOOTHILL BLVD.  
 OAKLAND, CALIFORNIA

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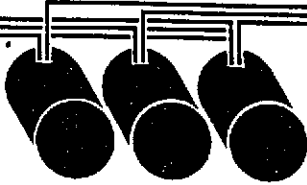
UNDERGROUND TANK CLOSURE PLAN

---

SCALE: 1" = 30'-0"

# PARADISO CONSTRUCTION CO

GENERAL & PETROLEUM CONTRACTORS



LICENSE NO. 259820  
P.O. BOX 6397  
9220 "G" STREET OAKLAND, CA 94603  
(415) 562-5511

## SOIL AND GROUNDWATER SAMPLING PROCEDURE Gasoline, Diesel and Waste Oil Tank Removal

Underground storage tanks require two soil samples per tank of 1000 gallon capacity or greater. Tanks of a smaller capacity require one sample per tank unless otherwise required by local agencies. Samples are collected at a depth of two feet below the tank backfill.

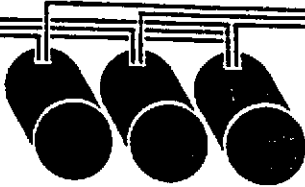
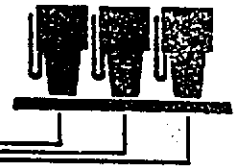
Soil samples from beneath gasoline storage tanks are analyzed for Total Petroleum Hydrocarbons (TPH) as gasoline (low to medium boiling fraction) using EPA method 8020. Samples from beneath diesel fuel storage tanks are analyzed for TPH as diesel (high boiling fraction) using EPA methods 3550 and 8015.

If groundwater is encountered in a fuel tank pit, water sample is collected. The sample is collected in a glass VOA (Volatile Organic Analysis) vial, insuring that no head space remains in the vial. The vial is sealed with a Teflon-lined screw cap. Water from a gasoline tank pit is analyzed for TPH as gasoline and BTX using EPA methods 602 and 5030. Water samples from a diesel tank pit are analyzed for TPH as diesel and BTX using EPA methods 3510 and 8020.

Soil samples collected from beneath waste oil tanks are analyzed for TPH high boiling fraction, using EPA method 3550 and 8015; total oil and grease (TOG) using EPA extraction method 3550 and gravimetric determination method 8010 and 8020 or EPA method 8240. Groundwater samples collected are collected as described above and are analyzed for TPH, high boiling fraction using EPA methods 3510 and 8020, and volatile organic compounds using EPA method 6240.

The analysis for all soil and water samples are done by a state certified lab.

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GENERAL

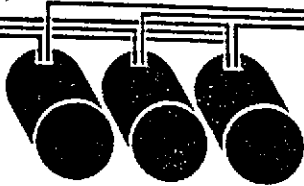
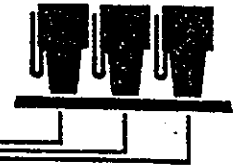
The company will furnish all safety equipment and tools to keep your place of work safe as possible, "use them".

Housekeeping: Keep the jobsite clear of scrap materials and debris especially near the trenches and excavations.

Barricades: The bulk of our work involves underground tanks and piping, so it involves trenching and excavation and a good many sites are kept in operation; we also have to provide safety for the general public. Use an ample amount of barricades and trench covers so that customers that are trying to use the facility are aware of the hazard that exists. Be especially aware of children that come on the site to see what is going on, and keep them well away from the excavation and equipment, or better yet keep them off the site entirely.

# PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS



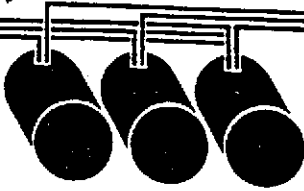
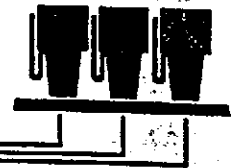
LICENSE NO. 259820  
P.O. BOX 6397  
9220 "G" STREET OAKLAND, CA 94603  
(415) 562-5511

## PERSONAL PROTECTIVE EQUIPMENT

1. EYE PROTECTION: When cutting or burning, chipping or breaking concrete, or anytime you are subjected to eye injury, wear your goggles or safety glasses.
2. HEAD PROTECTION: When you are working in an area where you are subjected to falling objects or the site is a hard hat area, wear your hard hat.
3. BODY PROTECTION: Clothing appropriate for the work must be worn.
4. FOOT PROTECTION: Wear sturdy shoes appropriate to the work you are doing. When using a pavement breaker wear your toe protection devices.
5. HAND PROTECTION: When handling rough materials such as timbers, steel sheets, bars, and scrap; wear your gloves.
6. HEARING PROTECTION: When using a pavement breaker or operating noisy equipment, use your ear protection.
7. RESPIRATORY PROTECTION: Respirators must be worn when working in a confined space where dangerous air contamination exists, when sand blasting where toxic material evolves or when welding where there may be toxic substances.

# PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS



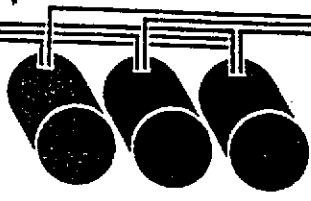
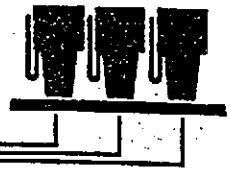
LICENSE NO. 259820  
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(415) 562-5511

## EQUIPMENT

1. Only trained or experienced employees may operate equipment.
2. Equipment operators must be sure other workers are clear before moving or operating this equipment. When changing buckets, be certain that the workers helping to change the bucket is clear before moving the boom. When using the boom for hoisting or moving equipment and or materials be sure the worker is clear before lifting or taking a strain on rigging.
3. Don't use damaged slings or cables, if they are questionable, call the office for replacement.
4. Avoid operations that expose employees to over head loads.

# PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS

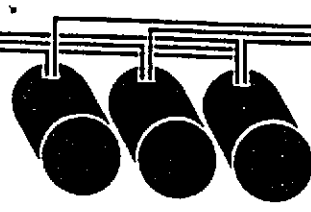


LICENSE NO. 259820  
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(415) 562-5511

## TOOLS

1. Don't use tools and equipment that are not in good repair; notify the office of the repairs that are needed.
2. All power tools are to be grounded.
3. SKILL SAWS: Saw guard must not be blocked open.
4. AIR COMPRESSORS: Air tank must be drained often, safety valve must be popped daily, all hoses to have safety clasp, and don't disconnect under pressure.
5. LADDERS: Defective or unsafe ladders will not be used, they shall be repaired or scrapped.

**PARADISO CONSTRUCTION CO.**  
GENERAL & PETROLEUM CONTRACTORS



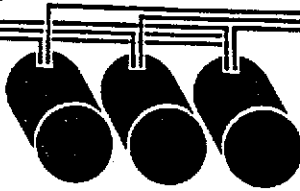
LICENSE NO. 259820  
P.O. BOX 6397  
9220 "G" STREET OAKLAND, CA 94603  
(415) 562-5511

FIRE PROTECTION/PREVENTION

1. SMOKING: No smoking on any service station site except in an approved area away from the islands and tanks.
2. FLAMMABLE LIQUIDS: No sources of ignition are allowed in any work area where there is presence of flammable liquids, gasoling etc...
3. FIRE EXTINGUISHERS: All trucks and heavy equipment are to be equipped with one 5 lb. A.B.C. extinguisher.
4. Gasoline should not be used as a cleaning agent.
5. No burning or welding should be done in an enclosed tank or vessel until it has been determined that there is no possibility of fire or explosion.
6. A gas detection device is available, all persons should be familiar with this device and know how to use it.

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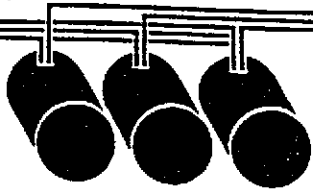
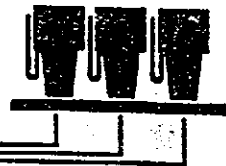
## EXCAVATION

1. Prior to excavating, the location of underground utilities must be determined and utility owners must be notified. This function will normally be done by the office but if you are not sure, call the office, especially, if you are to excavate in the street or sidewalk area.
2. All excavations 5' or more in depth that are to be entered, must be sloped  $3/4$  to 1 foot or shored.
3. All excavation must be inspected and monitored for ground movement on a continuing basis.
4. There must be proper qualified supervision at all times during excavation.
5. Safety provisions must be taken while installing and removing shoring, the work can be extremely dangerous if good practice is ignored.
6. Keep spoils well back 2' or more from the edge of all excavations.
7. Effective barriers and barricades are to be used around all excavations for your protection as well as others that may want to see the work going on. Keep all others not involved in the work well back from the excavations, especially children.
8. Watch for overhead power lines, keep at least 10' away from these conductors.
9. Trench covers: A facility that is to be kept in operation, as many are, set up barricades and cover trenches to reduce the possibility of a customer driving or walking into an open trench. When work is done for the day, insure that you leave the site in a safe condition.



# PARADISO CONSTRUCTION CO.

GENERAL & PETROLEUM CONTRACTORS



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9220 "G" STREET OAKLAND, CA 94603  
(415) 562-5511

## CONFINED SPACES

Before employees are allowed to enter confined spaces:

1. Lines containing hazardous substances must be disconnected, blinded, or blocked.
2. The space must be emptied, flushed or purged.
3. The air must be tested for dangerous contamination or oxygen deficiency. Ventilation is required if testing reveals any hazard.

Working in a confined space where dangerous air contamination exists requires:

1. Appropriate respiratory protection.
2. Safety belt (or harness) protection.
3. One standby employee (with respirator).



BP OIL

BP Oil Company  
Aetna Bldg., Suite 360  
2868 Prospect Park Drive  
Rancho Cordova, California 95670-6020  
(916) 631-0733

April 16, 1990

Mr. Rafat Shahid  
Alameda County  
Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94621

# 11109

Dear Mr. Shahid :

As you are aware, BP Oil Company acquired a number of service station properties from Mobil Oil Corporation on May 1, 1989. As part of this property transfer the service station listed on the attached page was screened for hydrocarbon contamination using a soil gas survey technique. Our records indicate that Mobil Oil submitted this survey to your office on December 1, 1989.

As the current operator of the facility BP Oil has a substantial long term interest in the outcome of your review of the soil gas assessment. Because of this, we respectfully request notification from Alameda County on any decisions which have been made, or are pending with regard to this facility. Specifically, we request notification on any additional environmental assessments or site characterizations which have been or will be required as a result of your review of the soil gas survey.

Please contact me should you have any concerns or questions. I look forward to hearing from you.

Sincerely,

W.J. Hollis  
Environmental Coordinator

WJH:dj

cc: D. Noe: Mobil Oil Corporation  
J.R. Rocco: BP Oil Company

Mr. Rafat Shahid  
Alameda County  
April 16, 1990  
cont.

<u>BP Site #</u>	<u>Mobil Site #</u>	<u>Address</u>
------------------	---------------------	----------------

BP #11109	(MOC 10-H69)-4280	Foothill Blvd., Oakland, CA
-----------	-------------------	-----------------------------

# Mobil Oil Corporation

MAR 2 1990

3800 WEST ALAMEDA AVENUE, SUITE 700  
BURBANK, CALIFORNIA 91505-4331

BP OIL CO.  
ENVIRONMENTAL DEPT.  
WEST COAST REGION OFFICE

*Highlights  
File*

*cc: D. Noe*

February 27, 1990

Mr. Ariu Levy  
Alameda County  
Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94621

*DAVID I RECEIVED RZA  
REPORT BUT  
NOT ALTON (FES '90)  
REPORT, PLS.  
FORWARD  
THANKS  
w/ Hollis*

MOBIL OIL CORPORATION  
FORMER S/S 10-H69  
4280 FOOTHILL BOULEVARD  
OAKLAND, CALIFORNIA  
BP S/S 11109

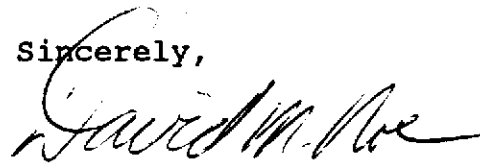
Dear Mr. Levy:

Enclosed for your review is the Site Investigation Report, dated February 16, 1990, for subject location. Free product was encountered in MW-1. Additional investigation will be done to evaluate the extent of the contamination. A work plan for the additional work will follow under separate cover.

Also enclosed is the prior subsurface investigation performed by Rittenhouse-Zeman, dated April 24, 1989.

If you have any questions, please feel free to contact me at (818) 953-2519.

Sincerely,



David M. Noe, P.E.  
Groundwater Projects Engineer

DMN:st

enclosures

April 24, 1989 RZA Report  
February 16, 1990 Alton Report

cc: Mr. Bill Hollis (w/o enclosures)  
BP Oil Company, Aetna Building, Suite 360  
2868 Prospect Park Drive, Rancho Cordova, CA 95670-6020

Mr. Lester Feldman (w/ enclosures)  
RWQCB -S. F. Bay Region  
1111 Jackson Street, Room 6000, Oakland, CA 94607

S. Pao - Burbank (w/o)

# Mobil Oil Corporation

3800 WEST ALAMEDA AVENUE, SUITE 700  
BURBANK, CALIFORNIA 91505-4331

89 DEC 26 AM 10:52

94601

December 18, 1989

Mr. Ariu Levy  
Alameda County  
Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94621

MOBIL OIL CORPORATION  
FORMER S/S 10-H69  
4280 FOOTHILL BOULEVARD  
OAKLAND, CALIFORNIA  
BP S/S 11109

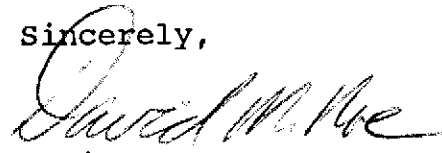
Dear Mr. Levy:

This letter is to confirm our conversation today that further investigation will be conducted at subject location. A site assessment will be submitted to your office by February 18, 1990. It appears from our records that no public water supply wells are within 2500 feet of the site.

The last tank test results, dated October 6, 1988, are attached. As you may notice, the tanks tested tight. Any work done after May 1, 1989 would have been done by BP Oil.

If you have any questions, please feel free to contact me at (818) 953-2519.

Sincerely,



David M. Noe, P.E.  
Environmental Advisor

DMN:st  
attachment

cc: Mr. Bill Hollis (w/o attachment)  
BP Oil Company, Aetna Building, Suite 360  
2868 Prospect Park Drive, Rancho Cordova, CA 95670-6020

Mr. Lester Feldman (w/o attachment)  
RWQCB -S. F. Bay Region  
1111 Jackson Street, Room 6000, Oakland, CA 94607

S. Pao - Burbank (w/o)

# Mobil Oil Corporation

DEC 27 1989

3800 WEST ALAMEDA AVENUE, SUITE 700  
BURBANK, CALIFORNIA 91505-4331

BP OIL CO.  
ENVIRONMENTAL DEPT.  
WEST COAST REGION OFFICE

December 18, 1989

*DS*  
*Do we have*  
*any work at this*  
*80' site?*  
*Bin*

Mr. Ariu Levy  
Alameda County  
Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94621

MOBIL OIL CORPORATION  
FORMER S/S 10-H69  
4280 FOOTHILL BOULEVARD  
OAKLAND, CALIFORNIA  
BP S/S 11109

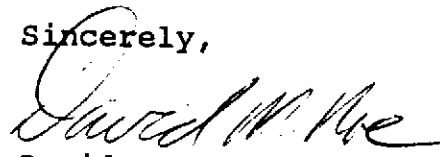
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Sincerely,



David M. Noe, P.E.  
Environmental Advisor

DMN:st  
attachment

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BP Oil Company, Aetna Building, Suite 360  
2868 Prospect Park Drive, Rancho Cordova, CA 95670-6020

Mr. Lester Feldman (w/o attachment)  
RWQCB -S. F. Bay Region  
1111 Jackson Street, Room 6000, Oakland, CA 94607

S. Pao - Burbank (w/o)

# Mobil Oil Corporation

3800 WEST ALAMEDA AVENUE, SUITE 700  
BURBANK, CALIFORNIA 91505-4331

November 29, 1989

Mr. Rafat Shahid  
Alameda County  
Health Care Services  
80 Swan Way, Room 200  
Oakland, CA 94621

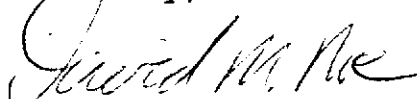
MOBIL OIL CORPORATION  
FORMER S/S 10-H69  
4280 FOOTHILL BOULEVARD  
OAKLAND, CALIFORNIA  
BP S/S 11109

Dear Mr. Shahid:

Enclosed for your review and information is the Soil Gas Survey, dated March 1989, for subject location. The survey was conducted in accordance with the property transfer agreement between Mobil Oil Corporation and British Petroleum Oil Company that was executed in May, 1989.

If you have any questions, please feel free to contact me at (818) 953-2519.

Sincerely,



David M. Noe, P.E.  
Environmental Advisor

DMN:st  
attachment

cc: Mr. Bill Hollis (w/o attachment)  
BP Oil Company, Aetna Building, Suite 360  
2868 Prospect Park Drive, Rancho Cordova, CA 95670-6020

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