

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0426

August 10, 1999
StID #102

Mr. Scott Hooton
BP Exploration & Oil Inc.
295 SW 41st 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



RO# 426

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 41st 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

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO#426

April 16, 1997

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Timothy Johnson
Environmental Compliance
The Circle K Company
Division of Tosco Company
601 Union Street, suite 250
Seattle, Washington 98101

STID # 102

Re: BRITISH PETROLEUM STATION, 4280 FOOTHILL BLVD., OAKLAND,
CALIFORNIA 94601

Dear Mr. Timothy Smith:

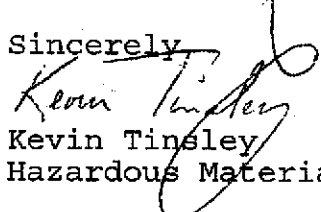
I have received your correspondence requesting our office to waive soil sampling during the abandonment of the waste oil tank's remote fill line. After thorough consideration of your concerns regarding leaving the service bay flooring intact and the sampling which occurred in October 1994, our office will permit fewer sampling points.

Based upon the construction of the waste oil tank piping and spill basin, sampling will be required underneath the pipeline connection with the waste oil tank. Subsequent sampling required inside the service bay may be omitted at this time. A note will be placed in your file to remove the abandoned line and complete the sampling should the station be sufficiently remodeled or demolished.

A representative of this office will witness the field activities. You should be aware, submission of a workplan with \$180.00 deposit is required to recover oversight costs. Notify this office at least 48 hours prior to commencing field activities.

If you have any questions or concerns, do not hesitate to call me at (510) 567-6731.

Sincerely,


Kevin Tinsley
Hazardous Materials Specialist

c, Don Hwang, Hazardous Materials Specialist, Al.Co. E.P.S.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY



DAVID J. KEARS, Agency Director

R0426

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

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



RO 426

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 3, 1994
StID # 102

Mr. Steve Mahoney
30 Northwest St.
Yerlington, NV 89447

**Re: Underground Storage Tank (UST) Local Oversight Program,
Site No. 102, 4280 Foothill Blvd., Oakland CA 94601**

Dear Mr. Mahoney:

Please be advised that as a former property owner of an underground tank site which reported an unauthorized release of petroleum hydrocarbon during your ownership, you are required to remain on the County's list of potential responsible parties for the investigation at the above referenced site. We are aware that you may have an agreement with BP Oil Company, however, as you are aware, any agreement which exists between you and BP must be a civil matter.

If you have any questions, please contact Lori Casias of the State Water Resources Control Board.

Sincerely,

A handwritten signature in cursive script that reads "Barney Chan".

Barney Chan
Hazardous Materials Specialist
Local Oversight Program

cc: S. Hooten, B.P. Oil, 16400 S. Center Parkway #301, Tukwila,
WA 98188

updt4280

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0426

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

July 27, 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 Hooten
B.P. Oil Company
Environmental Resource Management
16400 Southcenter Parkway, Suite 301
Tukwila, Washington 98188

Re: Comment on July 14, 1993 Quarterly Monitoring Report for
BP Station # 11109, 4280 Foothill Blvd., Oakland 94601

Dear Mr. Hooten:

Our office has received and reviewed the above referenced quarterly monitoring report as prepared by your consultant Alisto Engineering Group. We have the following comments and requests:

1. Please provide the status of your proposed groundwater treatment system on each quarterly monitoring report as stated in your 2/2/93 letter. There was no information in this regard in the above referenced monitoring report.
2. Please give the status of the free product recovery from monitoring well, MW-5, in all quarterly reports as stated in your 2/2/93 letter.
3. Please provide evidence of B.P.'s request and denial for the installation of borings on Foothill Blvd. just west of your site. Recall, I requested this information in my 3-26-93 letter to you.
4. Lastly, our office agrees with the termination of the analysis for halogenated volatile organics for MW-2. We concur that the initial detection of methylene chloride appears to have been an anomaly and doesn't require further investigation.

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

Sincerely,

A handwritten signature in cursive script that reads "Barney M. Chan".

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
E. Howell, files 4-4280BP

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0426

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

March 26, 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: Comment on February 2, 1993 Letter Regarding Status at
BP Oil Site No. 11109, 4280 Foothill Blvd., Oakland 94601**

Dear Mr. Hooton:

We have received your February 2, 1993 letter in response to my January 30, 1993 letter regarding the status of the investigation and remediation at the above site. Our office has the following comments to this letter:

1. In your response to my point four, you stated that you believed additional exploratory borings may provide a better understanding of the areal hydrostratigraphy. You also stated that your requests for permission to drill in the street had been denied by the City of Oakland. Please provide evidence of this attempt and identify any persons our office may contact to support your request for off-site drilling or on-site permitting.
2. Our office's requests the resumption of the analysis of halogenated volatile organics based on the groundwater results of your February 14, 1991 sampling which reported 51 ppb methylene chloride, detection limit= 5ppb. Please reinstate HVOC's in your analysis unless you can explain this analytical result.

Please provide written comment to the above issues within 30 days of receipt of this letter.

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
R. Hiatt, RWQCB
B. Oliva, ACHCSA
E. Howell, file
1-4280 FTH1

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0426

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

2-4280bp

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0426

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

Certified Mailer # P869 531 74P

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, 1992
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.

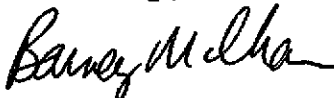
5. Your December 30, 1992 cover letter to the groundwater monitoring report states that you have initiated product recovery in MW-5. Please describe how this is being done. Please include the amounts of free product recovered, quarterly and total, on your future monitoring reports. At what frequency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

2-4280FH

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0426

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 94621

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.

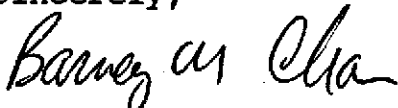
Please respond to these comments in writing to our office within **45 days** of receipt of this letter.

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
E. Howell, files

4280FTHLAdd

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0426

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

Certified Mailer #: P 062 128 220

September 13, 1991

BP Oil Co.
4280 Foothill Blvd.
Oakland, CA 94601
Attn: Chong R. Park

SECOND NOTICE OF VIOLATION

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company, Facility #11109, 4280 Foothill Blvd.
Oakland, California 94601**

Dear Mr. Park:

On July 19, 1991, Young Fong from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

As you are aware, four double-walled underground storage tanks (three product and one waste oil) exist at the subject facility. During this inspection, Ms. Mendoza noted the following violations of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (H&SC):

- 1) Section 2635(b)(6) & (7), CCR and Section 25289(b) of H&SC - This office has not received the initial tank and piping tightness/leak detection test results for all the tanks at the subject facility. Please provide us with a copy of test results;
- 2) We have received a copy of your proposed format of a written monitoring plan and spill/leak response plan for BP stations in Alameda County. This format does not adhere to the requirements of Title 23 which were specified in the first Notice of Violations sent to your office. The following is a summary of comments on the documents you have submitted:

I. Routine Monitoring Plan - A proposed

4280 Foothill Blvd. Oakland, CA.
September 13, 1991
Page 2 of 8

written routine monitoring was submitted although it contains insufficient information. Please be advised that a site specific written routine monitoring plan shall conform with the requirements of Title 23 and shall include the following information:

- a) The frequency of performing the monitoring method;
- b) The methods and equipment to be used for performing the monitoring;
- c) The location(s) where the monitoring will be performed;
- d) The name(s) and title(s) of the person(s) responsible for performing the monitoring and/or maintaining the equipment;
- e) The reporting format;
- f) The preventive maintenance schedule for the monitoring equipment. The maintenance schedule shall be in accordance with the manufacturer's instructions; and
- g) A description of the training needed for the operation of both the tank system and the monitoring equipment.

The following are comments on the proposed written routine monitoring plan submitted:

- a) DESCRIPTION - Provide a better way of defining the underground storage tank systems. Include information on sizes, contents and basic specifications.
- b) MONITORING FREQUENCY - Include information on the presence, function and monitoring frequency of Veeder Root TLS 250 and

4280 Foothill Blvd. Oakland, CA.
September 13, 1991
Page 3 of 8

continuous pipeline leak detectors (e.g. "Red Jacket").

c) METHOD OF MONITORING - Please note that a routine monitoring plan should be site specific and method(s) and monitoring equipment(s) may vary by station. Make the appropriate changes.

d) MONITORING SYSTEM DESCRIPTION -

- 1. Underground Tanks and Piping - This is not part of a routine monitoring procedure and should be deleted from the proposed plan.
- 2. Provide explanation on what is included in the annual inspection of tanks and piping systems to ensure proper operation. Please note that preventive maintenance schedule including calibration of the monitoring equipment(s) shall be in accordance with the manufacturer's instructions;

In addition to the items mentioned above, include the following information in the proposed routine monitoring plan:

- 1. Locations of probes in the interstitial space(s) where electronic monitoring device(s) (e.g. Veeder Root TLS 250, etc.) monitor for leaks - whether probes are installed in the interstitial space of tank(s), piping, sumps, island trench, etc.;
- 2. Description of training needed for operators and BP Maintenance employees or contractors for the routine operation and maintenance of both the tank system and the monitoring equipment(s);
- 3. Reporting format.

II. Spill/Leak Response Plan - The proposed spill/leak response plan submitted contains

4280 Foothill Blvd. Oakland, CA.
September 13, 1991
Page 4 of 8

insufficient information. The following information must be included in the plan:

- a) BP Oil Maintenance Department's phone number (whether 24-hr. or not) and time frame of responding to the call. Include type of calls Maintenance Department respond to and specify extent of BP Maintenance Department's responsibilities. Also, indicate the number of pump-out truck(s) which respond to calls on a 24-hr. basis and availability of back-up truck should one breaks down or numerous emergency calls are received;
- b) Procedures to be followed by BP Maintenance staff should liquid in the interstitial space or secondary containment system be determined to be product, waste oil or water;
- c) Integrity tests schedule, where applicable;
- d) Manager/owner's responsibility as far as determining leak occurrence or that the monitoring device has malfunctioned. Include procedures on what they have to follow in order to conduct this preliminary investigation;
- e) Reporting and recording procedures and/or responsibilities in the event of unauthorized release, per Article 5, Title 23, CCR;

You may utilize the requirements for spill/leak response plan according to Sections 2632(e)(2) or 2634(c) of the revised Title 23, California Code of Regulations (CCR), whichever is applicable. The following requirements are presented for your reference:

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

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that any unauthorized release will be removed from the secondary containment system within the time consistent with the ability of the secondary containment system to contain the hazardous substance, but not more than 30 calendar days. The response plan shall include, but is not limited to, the following:

- a) A description of the proposed methods and equipment(s) to be used for removing and properly disposing of any hazardous substances, including the location and availability of the required equipment(s) if not permanently on-site, and an equipment maintenance schedule for the equipment located on-site;
- b) The name(s) and title(s) of the person(s) responsible for authorizing any work necessary under the response plan.

The requirements mentioned above can be used for new underground storage tanks, both fuel and non-fuel type (including waste oil), constructed according to standards set forth in Section 2631, Title 23, CCR.

2. Section 2634(c), Title 23, CCR - The following requirements can only be implemented if the leak interception and detection system DOES NOT meet the volumetric requirements of subsection 2631(d), Title 23, CCR. The response plan shall consider the following:
 - a) The volume of the leak interception and detection system in relation to the volume of the primary container;
 - b) The amount of time the leak interception and detection system must provide containment in relation to the period of time between detection of an unauthorized release and cleanup of the

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leaked material;

- c) The depth from the bottom of the leak interception and detection system to the highest anticipated level of groundwater;
- d) The nature of the unsaturated soils under the leak interception and detection system and their ability to absorb contaminants or to allow movement of contaminants; and
- e) The methods and scheduling for removing all of the hazardous substances which may have been discharged from the primary container and are located in the unsaturated soils between the primary container and ground water, including the leak interception and detection system sump.

The requirements mentioned above can be utilized for new motor vehicle fuel underground storage tanks only, if they meet the alternate construction requirements, pursuant to Section 2633, Title 23, CCR.

Please be advised that the requirements discussed in Sections 2632(e)(2) and 2634(c) are adopted from the revised Title 23, CCR and were effective August 9, 1991. You may obtain a copy of the regulations by contacting State Water Resources Control Board at (916) 324-1262.

- 3) Section 2635, Title 23, CCR - Our office has not received as-built documents regarding the subject site. Per the above section, you are required to submit these documents to our office and should include at least the following:
 - a) Drawings that show the locations of all tanks, piping, sumps, overfill basins, etc.;
 - b) Materials used for tank and piping (i.e. brands, single or double-walled, steel or PVC, etc.)

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- c) Locations and type of equipment used for continuous leak detection. Include types of probes and probe positions.
- 4) For the double-walled waste oil tank which was installed after 1984, in addition to the requirements mentioned above, you are required to perform the following action:
 - a) Install a continuous electronic leak detection system with audio and visual alarms for the interstitial space.
- 5) Our agency does not have on file current copies of underground storage tank permit applications. Per Section 2711, you are required to submit to our agency correctly and completely filled out Form A for the facility and Form B for each underground storage tank.

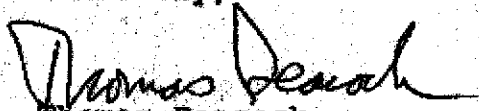
Please note that copies of the documents requested above (except item #4) and other related tank/pipe integrity records shall be maintained on-site for at least three (3) years.

Submit all the required materials to this office within 10 working days, i.e. no later than September 27, 1991. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

Failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code, of not less than five hundred dollars (\$500) or more than five thousand dollars (\$5,000) for each underground storage tank for each day of violation.

Should you have any questions or concerns regarding the contents of this letter, please feel free to contact either Brian Oliva or myself, at (510) 271-4320.

Sincerely,



Thomas Peacock
Sr. Hazardous Materials Spec.

FYF:fyf

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cc: Pete DeSantis, Environmental Coordinator, BP Oil Company
Dale Swain, Alton Geoscience
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division



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

July 31, 1991

Mr. Chong R. Park
BP Oil Co.
4280 Foothill Blvd.
Oakland, CA 94601

NOTICE OF VIOLATION

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company Facility #11109, 4280 Foothill Blvd.
Oakland, California 94601**

Dear Mr. Park:

On July 19, 1991, Young Fong from our office inspected the above premises. The inspection was performed to determine if the requirements to issue a 5-year underground storage permit were being met.

As you are aware, four double walled underground storage tanks (three fuel and one waste oil) exist at the subject facility. Per Title 23, California Code of Regulations (CCR) and California Health and Safety Code (H&SC), you are required to submit the following items:

- a) A written routine monitoring procedure/plan per Section 2632 or 2634, Title 23, CCR. These sections describe the monitoring procedures for new tanks installed after 1984, and new motor vehicle fuel tanks installed after 1984. These procedures should include, where applicable: a description of the electronic monitoring system, the location of the alarm, the location(s) of the monitoring probes, the name(s) or title(s) of the person(s) responsible for performing the monitoring and/or maintaining the equipment, and the reporting format.
- b) In addition, Section 2632 requires that a response plan be developed by the facility that describes how an unauthorized release will be removed from the secondary container within the shortest possible time. It should include at least the following:
 - 1) A description of the proposed methods and equipment to be used for removing the hazardous substances, including the location and availability of the required equipment, if not

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July 31, 1991
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permanently on-site, and an equipment maintenance schedule for the equipment located on-site.

- 2) The name(s) or title(s) of the person(s) responsible for authorizing the work to be performed.
- c) You are required to provide this office with "As Built" drawings indicating underground storage tank and piping specifications per Section 2635 (c) (8), Title 23, CCR.

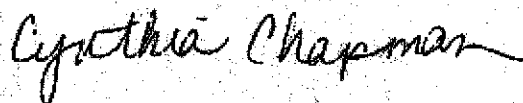
Please note that copies of the documents requested above and other related tank/pipe integrity records shall be maintained on-site for at least three (3) years.

Submit all of the required materials to this office no later than August 19, 1991. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

Failure to respond in a timely manner could result in civil liabilities under Division 20, Chapter 6.7, Section 25299 of the Health and Safety Code.

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

Sincerely,



Cynthia Chapman,
Hazardous Materials Specialist

FYF:fyf

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0426

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

July 17, 1990

Annette Smith
Tait & Associates
7803 Madison Avenue, Suite 700
Citrus Heights, CA 95610

Dear Ms. Tait:

This office has reviewed the installation plans for 4280 Foothill Boulevard, in Oakland. The following items need to be clarified before a permit will be issued:

- * Please provide the manufacturer's specifications for the alarm system that will be used to monitor the annular space and product lines of each tank.
- * The plans need to indicate that product piping and its secondary containment need to be monitored. This is usually done by installing a monitoring device in the piping sump.
- * The plans need to show the location of the audio-visual alarm system.
- * Secondary containment is required on vapor recovery and vent lines if the tank system allows fluid into these pipes. Otherwise, they need to have check valves, and this is not illustrated in the plans.
- * Overfill protection needs to be a minimum of five (5) gallons.

Please respond in writing (or by submitting another set of plans) to address these items. If you have any questions regarding these issues, please call me at 415/271-4320.

Sincerely,

Cynthia Chapman

Cynthia Chapman
Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Director



Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

R0426

Certified Mailer #P 759 896 738

Telephone Number: (415) 271-4320

23 August 1988

Mr. Moody Younger
Mobil Oil Corporation
P. O. Box 127
Richmond, California 94803

Subject: Underground Tank Permit Applications for Mobil Service
Station #10-464, 4280 Foothill Blvd. Oakland

Dear Mr. Younger:

We have reviewed our files on Mobil Service Station #10-464 at 4280 Foothill Blvd. in Oakland and require the following information be submitted to our office within 45 days of the date of this letter:

- 1) Underground Storage Tank Program Form A (one for the site); and
- 2) Underground Storage Tank Program Form B (one for each existing underground tank on site).

Copies of the forms are enclosed. Complete all forms according to instructions and submit all copies of each completed form. If you have any questions, please contact Katherine Chesick, Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid
Rafat A. Shahid, Chief,
Hazardous Materials Division

RAS:kac

cc: John Tofield, Robert H. Lee and Associates
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Katherine Chesick, Hazardous Materials Specialist
Files