

R0489

DAVID J. KEARS, Agency Director

STID 780

August 5, 2002

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street Renton, Washington 98055-4931 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I have received and reviewed "Second Quarter 2002 Groundwater Monitoring report" dated June 7, 2002, by Mr. Khaled Rahman of Cambria Environmental Technology, Inc. regarding the above referenced site. I would like to make the following comments regarding this report:

- Groundwater flow gradient is to the northwest at 0.003 ft/ft, Per figure 1 within this
 report.
- Depth to groundwater was calculated at 23.5 to 22.75 fbgs.
- MW-5 well contains the highest concentrations of constituents at 140ppb,0.542bbb, and 75.6ppb of TPH-G, Benzene and MTBE. This reveals a slight increase in Benzene concentration and a slight decrease in MTBE concentration since the last analysis.
- MW-1, MW-2, MW-3, and MW-7 were not sampled since they have historically revealed non-detect concentrations of constituents in the past.

Should you have any questions, please call me at (510)-567-6876.

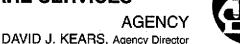
Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Mr. Khaled Rahman of Cambria Environmental Technology, Inc. 1144 65th Street, Suite B, Oakland, CA 94608





STID 780

October 1, 2001

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

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

FAX (510) 337-9335

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I am in receipt of the "Second Quarter 2001 Groundwater Monitoring report" dated June 22, 2001, by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site. I would like to make the following comments regarding this report:

- Per this report the highest concentration of contaminants belonged to MW-5, MW-6, and MW-4 wells respectively.
- MW-1 through MW-3 were not sampled and MW-7 well contained <0.5ppb of contaminants. Therefore, you may discontinue MW-7 and all wells, which historically have revealed nondetect concentrations of constituents, from sampling and monitoring program.
- MW-6 well contained non-detect (<0.5 ppb) of constituents as well with the exception of MTBE at 169ppb, which reveals an increase in this constituent compared to the previous analysis.
- The concentration of Benzene was detected at <0.5ppb in MW-4, MW-5, and MW-6 wells while MTBE concentrations, on the other hand, were detected at 119ppb, 419ppb, and 169ppb in MW-4, MW-5, and MW-6 wells respectively. There seems to be some minor oscillation observed in the concentration of MTBE.
- Groundwater flow gradient is to the northwest at 0.003 ft/ft, according to figure 1 within this report,

If you have any questions and or concerns, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105 Files

AGENCY



DAVID J. KEARS, Agency Director

June 28, 2001

STID 780

P3489

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

Janette M. Thompson Regional Compliance Specialist Tosco Marketing Company 2000 Crow Canyon Place, Ste 400 San Ramon, California 94583

Hassan D. Yeylaghi Dealer, #30164 18501 Hesperian Bouleyard San Lorenzo, California 94580

Subject: Underground storage tank operating permit, 18501 Hesperian Boulevard, San Lorenzo CA 94580

Dear Ms. Thompson and Mr. Yeylaghi:

This letter is intended to guide you as the owner/operators in the proper management of the underground storage tanks (USTs) located at the subject site and to describe actions necessary for compliance with the permit conditions.

The installed system at the above location includes three double wall fiberglass reinforced plastic (FRP) motor vehicle fuel tanks (MVF). The double wall FRP pressurized piping is monitored continuously at the submersible turbine pump sump (STPS) on top of each tank. Tank leak detection is performed using an annular space sensor in each of the tanks..

All components of the fuel delivery system are continuously monitored for releases. The electronic monitor, Veeder Root TLS 350, is configured to shut down the appropriate turbine(s) if the monitor is in alarm as a result of a product detection in the STPS. The turbine(s) will also shut down if power to the monitor is disconnected. Dispenser containment is equipped with mechanical shear valve shutdown of product lines if liquid is detected in the containment.

The fourth UST is a 1,000 gallon double wall FRP used oil tank. The tank is monitored in the annular space for a release. The tank is filled through a straight drop into the tank and visually monitored to prevent overfilling. A container of less than 25 gallons is used to make additions to the tank.

Compliance with the following conditions is a requirement of the permit to operate:

- 1. Perform leak detection using the sensors and monitoring system as described above.
- Provide a qualified maintenance contractor for the annual inspection of the entire UST system.System certification by your contractor may take place concurrently.

- Annually perform operational tests on the electronic monitoring equipment employing factory
 certified technicians. Maintain records of all maintenance performed on the tank system for at
 least three years.
- Maintain <u>written records of all liquid alarm conditions and their resolution</u>. Maintain certification
 of financial responsibility with documentation on-site.
- Provide employee training and document such training necessary to operate a retail fueling station including but not limited to responding to fuel spills and emergencies.
- 6. Report unauthorized releases to this office within 24 hours of discovery. Provide a written report within five working days.
- All changes in monitoring equipment must be pre-approved by this office prior to implementation.
- 8. Report changes in facility operator or tank ownership within 30 days of the change.
- 9. Maintain a copy of the operating permit and operating conditions on-site.

This permit expires on December 14, 2002. If you have any questions regarding the operation of this tank system please contact me at (510) 567-6781.

Sincerely.

Robert Weston

Sr. Hazardous Materials Specialist

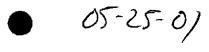
enclosures

c: Susan Hugo, ACDEH Tosco Corporation, P.O. Box 52085, Phoenix, AZ 85072

Alameda County Environmental Health Services STID #780 June 28, 2001 Issue Date-PR0300489 **Underground Storage Tank Operating Permit** Expiration Date- December 14, 2002 UST Facility Name- TOSCO #30164 Address-18501 Hesperian Blvd., San Lorenzo CA 94580 (Tank Location) Phone- 510 481-2161 Tank Operator-Hassan D. Yeylaghi Tank Owner-Tosco Corporation Address-P.O. Box 52085, Phoenix AZ 85072 Phone- 925 277-2404 Total Number of USTs- 4 Emergency Contact Person (day)- Hassan D. Yevlaghi Phone- 510 481-2161 Emergency/Spill Response Plan- Yes Emergency Contact Person (night)- TMC Service Phone- (800)726-2312 24hr Certification of Financial Responsibility- Yes BOE # 44-036244 Current Plot Plan- Yes Owner's Tank ID # ---1- State UST I.D. (01-000-) 1-039553-000001 1-039553-000003 1-039553-000002 1- 039553-000004 2- Capacity (gallons) 2-12,000 2-10,000 2-10,000 2-1,000 3- Hazardous Substance Stored 3-87 Gasoline 3- Úsed oil 3-89 Gasoline 3- 92 Gasoline 4- Monitoring Method for Tank 4- Interstitial 4- Interstitial 4- Interstitial 4- Interstitial 5- Tank Monitoring Frequency 5- Continuous 5- Continuous 5- Continuous 5- Continuous 6- Tank Monitoring Alarm? 6- Audible/Visible 6- Audible/Visible 6- Andible/Visible 6- Audible/Visual 7- Tank Integrity Test (frequency) 7- None 7- None 7- None. 7- None 8- Monitoring Method for Piping 8- Interstitial/LLD 8- Interstitial/LLD 8- Interstitial/LLD 8- NA 9- Piping Monitoring Frequency 9- Continuous 9- Continuous 9- Continuous 9- NA 10- Piping Monitoring Alarm? 10- Audible/Visible 10- Audible/Visible 10- Audible/Visible 10- NA 11- Automatic Pump Shutdown? 11- Yes 11- Yes 11- Yes 11- NA 12- Piping Precision Test (frequency) 12- NA 12- NA 12- NA 12- NA 13- Overfill (device) 13- Drop Tube Shutoff 13- Drop Tube Shutoff 13-Drop Tube Shutoff 13-Visual 14- Spill Container/Size (gallons) 14~ 15 14- 15 14-15 14- 15 15- Corrosion Protection (method) 15-Fiberglass 15-Fiberglass 15-Fiberglass 15- Fiberglass This operating permit is granted subject to the following conditions: All applicable state UST requirements contained in the California Code of Regulations, Title 23, Division 3, Chapters 16 and 18, the California Health & Safety Code, Division 20, Chapters 6.7 and 6.75. The owner or operator must report any unauthorized releases to the environment to Alameda County Environmental Health Services within 24 hours after the release has been detected or should have been detected. [Call (510)567-6700 M-F from 8:30 to 5, and (510)667-7721 after hours] The owner or operator must comply with the approved routine monitoring procedures and response plan submitted to support this permit, Monitoring and maintenance records must be maintained on-site for 3 years. JUN 2 8 2001 Issued by C) 1989 GOES P



DAVID J. KEARS, Agency Director



P0489

Stid 780

May 23, 2001

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street Renton, Washington 98055-4931 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office is in receipt of the "First Quarter 2001 Groundwater Monitoring report" dated April 10, 2001 by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site.

According to this report the highest concentration of contaminants belonged to MW-5, MW-4, and MW-6 wells respectively. MW-1 through MW-3 were not sampled and MW-7 well contained <0.5ppb of contaminants. Therefore, you may discontinue MW-7 well from sampling and monitoring program at this time. MW-6 well contained non-detect (<0.5 ppb) of constituents as well with the exception of MTBE at 2.69ppb. However, it did contain 380ppb of MTBE previously. If this trend continues, you may request to discontinue MW-6 well from sampling and analysis as well. The concentration of Benzene was detected at <0.5ppb in MW-4, MW-5, MW-6 wells while MTBE concentrations, on the other hand, were detected at 176ppb, 585ppb, and 2.69ppb in MW-4, MW-5, and MW-6 wells respectively. There seems to be some minor oscillation observed in the concentration of MTBE.

Per figure 1 within this report, the Groundwater flow gradient is to the northwest.

Should you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Mr. Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-

Mr. Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B, Oakland, CA 94608

AGENCY



DAVID J. KEARS, Agency Director

20489

ENVIRONMENTAL HEALTH SERVICES

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

Stid 780

January 3, 2001

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I am in receipt of the "Fourth Quarter 2000 Groundwater Monitoring report" dated December 22, 2000 by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site. Thank you for the submittal of the report.

Based on this report MW-1 through MW-3 were not sampled as in the past. The highest concentration of contaminants were found in MW-4, MW-5, and MW-6 wells. The concentration of Benzene was detected at <0.5ppb in MW-4, MW-5, MW-6, and MW-7 wells while MTBE concentrations, on the other hand, were detected at 210ppb, 360ppb, and 380ppb in MW-4, MW-5, and MW-6 wells respectively. The concentration of MTBE was detected at <0.5 for MW-7 wells. This indicates general reduction in the concentration of the constituents.

Groundwater flow gradient is to the northwest as indicated on Figure 2 in this report.

If you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Mr. Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105

Mr. Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B, Oakland, CA 94608

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

RO# 489

Stid 780

October 31, 2000

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street Renton, Washington 98055-4931 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I am in receipt of "Second Quarter 2000 Groundwater Monitoring report" dated May 30, 2000 by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site.

Per this report the concentrations of contaminants in most monitoring wells have generally decreased, the contaminant concentration in MW-4, MW-5, and MW-6 wells are higher compared to other wells. The MW-1 through MW-3 were not sampled. The Benzene concentration was found at <0.5ppb in MW-4 through MW-7. However, the MTBE concentrations of 800ppb, 240ppb, and 220ppb were detected in MW-4, MW-5, and MW-6 wells respectively. Additionally the highest concentration of TPHG was observed at 300ppb in MW-4. This shows a bit of increase since the last analysis.

Figure 1 reveals the groundwater flow gradient to be northwesterly.

I will be looking forward for the next quarterly groundwater monitoring report.

If you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105

Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B, Oakland, CA 94608

AGENCY



SCTUT3-24-2m rold ca's

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP)

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

FAX (510) 337-9335

Stid 780

March 23, 2000

Mr. Scott Hooton BP Oil Company **Environmental Remediation Management**

Renton, Washington 98055-4931

DAVID J. KEARS, Agency Director

295 SW 41st Street

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I sent you a letter regarding the receipt of "4th Quarter 1999 Groundwater Monitoring" dated February 3rd, 2000 by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site. I made some comments regarding the above document including the fact that the report indicated the groundwater flow gradients to be northwesterly as portrayed on figure 1.

Additionally I indicated that the concentrations of contaminants in most monitoring wells have generally decreased, and that the contaminant concentration in MW-4, MW-5, and MW-6 wells are still higher compared to MW-7 well. Furthermore, I mentioned that the MTBE concentrations of 410ppb, 550ppb, and 360ppb for MW-4, MW-5, and MW-6 wells were observed respectively and that the concentrations of TPHG decreased in all of the indicated wells to below 50ppb.

I am not sure if you received my letter and whether Mr. Khaled Rahman of Cambria Environmental is still your consultant regarding the above referenced site.

Please inform me as to who your consultant is at the present time.

I will be looking forward for the next quarterly groundwater monitoring report.

If you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105
Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B, Oakland, CA 94608
Files

HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



20489

Stid 780

March 7, 2000

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street Renton, Washington 98055-4931 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office is in receipt of "4th Quarter 1999 Groundwater Monitoring" dated February 3rd, 2000 by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site. I have the following comments regarding the above document:

- The groundwater flow gradients portrayed on figure 1 indicates a northwesterly direction.
- The concentrations of contaminants in most monitoring wells have generally decreased, the contaminant concentration in MW-4, MW-5, and MW-6 wells are still higher compared to MW-7 well. The MTBE concentrations of 410ppb, 550ppb, and 360ppb for MW-4, MW-5, and MW-6 wells were observed respectively. The concentrations of TPHG decreased in all of the indicated wells to below 50ppb.

I will be looking forward for the next quarterly groundwater monitoring report.

Should you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105

Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B, Oakland, CA 94608

Sent 12128/99 Including ccs

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway

Alameda, CA 94502-6577

(510) 567-6700 (510) 337-9432 ROUPA

DAVID J. KEARS, Agency Director

Stid 780

December 22, 1999

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office is in receipt of Removal and Replacement of Product Lines and Dispensers report dated December 17th, 1999, by Mr. Robert Potter of Secor International Incorporated regarding the above referenced site. This letter addresses the above activities to do with the piping and dispensers only. Per this report all the soil samples were taken up to 3.5 feet below grades and did not find significant amount of petroleum hydrocarbon. For instance no benzene were found within any of the collected samples and the highest amount of MTBE detected were at 14.1 ppm at PL-3 at 3.5 feet below grades. I concur with Mr. Potter that no further action is necessary with respect to product line and dispenser replacement only.

As you are well aware, there are still existing issues, which must to be addressed, at the above referenced site per the letter dated November 18th, 1999 from this office.

If you have any questions and or concerns, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105 Mr. Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B. Oakland, CA 94608 files

AGENCY DAVID J. KEARS, Agency Director



PO489

Stid 780

November 18, 1999

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

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6700 (510) 337-9432

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office is in receipt of "Third Quarter 1999 Monitoring" dated June 21st, 1999, by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site. This report reveals the following:

- The groundwater flow gradients portrayed on figure 2 shows to be in northwesterly direction.
- Similar to previous report, the concentrations of contaminants in most monitoring wells have generally decreased while MW-4, MW-5, and MW-6 wells still have higher concentrations of constituents compared to other wells. The concentrations of TPHG remained at less than 50pppb in all of the wells mentioned above. The MTBE concentrations of 590ppb, 490ppb, and 1,400ppb for MW-4, MW-5, and MW-6 wells were observed respectively. This indicates MTBE concentration has increased in MW-5 and MW-6 wells and decreased in MW-4 well.

I will look forward for the next quarterly groundwater monitoring report regarding the above referenced site.

Please call me at (510)-567-6876, If you have any questions and or concerns.

Sincerely.

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105 Mr. Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B. Oakland, CA 94608 files





DAVID J. KEARS, Agency Director

Stid 780

October 7, 1999

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

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

i am in receipt of "2" Quarter 1999 Monitoring" dated June 21st, 1999, as well as the by Mr. Francis Thie of Blaine Tech Services, Inc. regarding the above referenced site. I would like to make the following comments regarding the above document:

- The groundwater flow gradients portrayed on figure 2 indicates a westerly direction in the previous report. However, the groundwater flow gradient is revealed to be northwesterly in this report.
- The concentrations of contaminants in most monitoring wells have generally decreased, the contaminant concentration in MW-4, MW-5, and MW-6 wells are still higher compared to other wells. The MTBE concentrations of 1100ppb, 310ppb, and 310ppb for MW-4, MW-5, and MW-6 wells were observed respectively. The concentrations of TPHG decreased in all of the wells mentioned above.
- Please inform me regarding the implementation of the May 21, 1999 workplan, submitted by Mr. Kahled Rahman of Cambria Environmental, which has been previously approved by this office.

Additionally, Please advise me whether Mr. Kahled Rahman of Cambria Environmental is currently your consultant on this site.

I will be looking forward for the next quarterly groundwater monitoring report and information regarding the status of the pre-approved workplan.

If you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Francis Thie of Blaine Tech Services, Inc. 1680 Rogers Ave., San Jose, CA 95112-1105 Mr. Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B, Oakland, CA 94608 files

AGENCY



DAVID J. KEARS, Agency Director

R0489

Stid 780

August 10, 1999

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street

Renton, Washington 98055-4931

ENVIRONMENTAL HEALTH SERVICES
1131 Harbor Bay Parkway, Suite 250

1131 Harbor Bay Parkway, Suite 2 Alameda, CA 94502-6577 (510) 567-6700 (510) 337-9335 (FAX)

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I am in receipt of "Investigation Work Plan" dated May 21st, 1999, as well as the letter dated August 4, 1999 by Mr. Khaled Rahman of Cambria Environmental, regarding the above referenced site. Per our previous discussion, this office had not received this work plan till August 6, 1999. Anyhow I concur with the overall scope of the proposed work the above referenced site. However, please address the following issues:

- The work plan includes the laboratory analysis of the contaminants present on site since 1992. However, the information regarding the MW-3 well is missing.
- The groundwater flow gradients portrayed on figure 2 indicates a westerly direction. However, the narrative discussion in the beginning indicates the ground water flow gradient to be northwesterly.
- Even though the concentrations of contaminants in most monitoring wells have generally decreased, the contaminant concentration in MW-4 and MW-6 wells have actually increased for TPH-G and MTBE constituents.
- Includes performance of EPA method 8260 test for exclusion of false positive for MTBE, as well as testing for all oxygenated compounds, once, to ensure absence of the TAME, DIPE, ETBE, TBA, EDB, and EDC per our previous discussions.

Please respond to the above by September 10, 1999. Should you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Mr. Kahled Rahman, Cambria Environmental, 1144 65th Street, Suite B, Oakland, CA 94608

files

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0489

Stid 780

August 2, 1999

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

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

Page 1 of 2

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

LANDOWNER NOTIFICATION AND PARTICIPATION REQUIREMENTS

Dear Mr. Hooton:

This letter is to inform you of new legislative requirements pertaining to cleanup and closure of sites where an unauthorized release of hazardous substance, including petroleum, has occurred from an underground storage tank (UST). Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code requires the primary or active responsible party to notify all current record owners of fee title to the site of: 1) a site cleanup proposal, 2) a site closure proposal, 3) a local agency intention to make a determination that no further action is required, and 4) a local agency intention to issue a closure letter. Section 25297.15(b) requires the local agency to take all reasonable steps to accommodate responsible landowners' participation in the cleanup or site closure process and to consider their input and recommendations.

For purposes of implementing these sections, you have been identified as the primary or active responsible party. Please provide to this agency, within twenty (20) calendar days of receipt of this notice, a complete mailing list of all current record owners of fee title to the site. You may use the enclosed "list of landowners" form (sample letter 2) as a template to comply with this requirement. If the list of current record owners of fee title to the site changes, you must notify the local agency of the change within 20 calendar days from when you are notified of the change.

If you are the sole landowner, please indicate that on the landowner list form. The following notice requirements do not apply to responsible parties who are the sole landowner for the site.

LANDOWNER NOTIFICATION

Re: 18501 Hesperian Blvd., San Lorenzo

August 2, 1999 Page 2 of 2

In accordance with Section 25297.15(a) of Ch. 6.7 of the Health & Safety Code, you must certify to the local agency that all current record owners of fee title to the site have been informed of the proposed action before the local agency may do any of the following:

- 1) consider a cleanup proposal (corrective action plan)
- 2) consider a site closure proposal
- 3) make a determination that no further action is required
- 4) issue a closure letter

You may use the enclosed "notice of proposed action" form (sample letter 3) as a template to comply with this requirement. Before approving a cleanup proposal or site closure proposal, determining that no further action is required, or issuing a closure letter, the local agency will take all reasonable steps necessary to accommodate responsible landowner participation in the cleanup and site closure process and will consider all input and recommendations from any responsible landowner.

Please call me at (510) 567-6876 if you have any questions about the content of this letter.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

cc: Chuck Headlee, RWQCB

Attachments: Sample letter 2 and Sample letter 3, which must be filled out by the Responsible Party and mailed to

Alameda County.

ALAMEDA COUNTY

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0489

ENVIRONMENTAL HEALTH SERVICES

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

Page 1 of 2

Stid 780

July 28, 1999

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I am in receipt of your letter dated July 23rd, 1999. As you are well aware, this office has, informed you of your legal obligations regarding the above referenced site on several occasions in the past. I have personally sent you several letters including the letters dated May 18th, 1999, July 19th, 1999, as well as verbal discussion regarding the requirement to submit a workplan. As indicated in my letter dated July 19th, 1999, the submittal of this workplan has been postponed several times in the past due to your requests. This delay in the submittal of the required workplan can not go on. However, I am willing to postpone the submittal of the required workplan, once again, to August 20th, 1999 per your written request.

Please be advised that the case, if not responded to, will be referred to District Attorney's office for enforcement. I will also send a copy of all previous letters to your company's headquarters for their information.

Per our previous discussion, the workplan is necessary for additional assessment regarding the need to perform a grab ground water sample and / or installment of a monitoring well down gradient of well MW-6, which is the most down gradient well on this site, to ensure that MTBE is not moving off site.

The workplan is required pursuant to Title 23, CCR, Section 2722(c). Please submit the required workplan by August 20th, 1999.

Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Should you have any questions, please call me at (510)-567-6876.

HEALTH CARE SERVICES

AGENCY



DAVID J. KEARS, Agency Director

R0489

Stid 780

July 19, 1999

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street Renton, Washington 98055-4931 **ENVIRONMENTAL HEALTH SERVICES**

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

NOTICE OF VIOLATION

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office has attempted to inform you of your legal obligations regarding the above referenced site on several occasions. The letters sent to you dated May 18th, 1999, and July 19th, 1999 required the submittal of a workplan. In fact, the submittal of this workplan has been postponed several times in the past.

Per our previous discussion, the workplan is necessary for additional assessment regarding the need to perform a grab ground water sample and / or installment of a monitoring well down gradient of well MW-6, which is the most down gradient well on this site, to ensure that MTBE is not moving off site.

The workplan is required pursuant to Title 23, CCR, Section 2722(c).

Please submit the required workplan by August 2nd, 1999. Please be advised that the case can be referred to Alameda County District Attorney's office for enforcement.

Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

If you have any questions, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Robert Chambers, Alameda County District Attorney's Office David B. De Witt, Tosco (UNOCAL) Environmental Project Manager Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA files

HEALTH CARE SERVICES





DAVID J. KEARS, Agency Director

RO489

ENVIRONMENTAL HEALTH SERVICES

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

Stid 780

July 7, 1999

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I sent you a letter dated May 18th, 1999, where I extended the due date for the submission of a required workplan to May 21, 1999 per our discussion on May 17th, 1999. To this date, this office has not yet received the required workplan.

The workplan, as you are aware, is necessary for additional assessment regarding the need to perform a grab ground water sample and / or installment of a monitoring well down gradient of well MW-6, which is the most down gradient well on this site, to ensure that MTBE is not moving off site.

Please be advised that this is a formal request for technical reports pursuant to Title 23, CCR, Section 2722(c). Any extensions of the stated deadlines, or modifications of the required tasks, must be confirmed in writing by this agency.

Please submit he required workplan in two weeks or by July 20th, 1999.

Please call me at (510)-567-6876, If you have any questions and or concerns.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files

AGENCY

DAVID J. KEARS, Agency Director



R0489

ENVIRONMENTAL HEALTH SERVICES

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

Stid 780

May 18, 1999

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

As you are aware, I sent you a letter dated April 22nd, 1999. In that letter I acknowledged the receipt of your letter dated April 10, 1999 and the 1st Quarter 1999 Groundwater Monitoring submitted by Blaine Tech Services Inc. As indicated previously, the EPA method 8260 found no other oxygenates beside MTBE in the monitoring wells MW-4, MW-5, and Mw-6.

Per our discussion on May 17th, 1999, I will extend the due date for the submittal of a workplan. The workplan, as you are aware, is necessary for additional assessment regarding the need to perform a grab ground water sample and / or installment of a monitoring well down gradient of well MW-6, which is the most down gradient well on this site, to ensure that MTBE is not moving off site.

Per your request the submission of the workplan can be postponed to May 21, 1999.

If you have any questions and or concerns, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files

AGENCY



DAVID J. KEARS, Agency Director

RO# 489

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

Stid 780

April 22, 1999

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street

Renton, Washington 98055-4931

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office is in receipt of your letter dated April 10, 1999 and the 1st Quarter 1999 Groundwater Monitoring submitted by Blaine Tech Services Inc. Thank you for addressing the "other oxygenates" issue. As you are aware, the submitted report indicates that the EPA method 8260 found no other oxygenates beside MTBE in the monitoring wells MW-4, MW-5, and Mw-6.

Per your letter dated April 10, 1999, and our previous correspondence, I will look forward to receive a workplan for additional assessment regarding the need to perform a grab ground water sample and / or installment of a monitoring well down gradient of well MW-6, which is the most down gradient well on this site, to ensure that MTBE is not moving off site.

I am aware that the submission of workplan was postponed to May 15, 1999 as requested through your previous correspondence.

If you have any questions and or concerns, please call me at (510)-567-6876.

Sincerely,	
W	

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, files

AGENCY DAVID J. KEARS, Agency Director



RO#489

ENVIRONMENTAL HEALTH SERVICES

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

Stid 780

March 29, 1999

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office is in receipt of your letter dated March 24,1999 and the 4th Quarter 1998 Groundwater Monitoring submitted by Blaine Tech Services Inc. This office concurs with your proposal stated in the letter. In addition, you may extend the submission of workplan to May 15, 1999 as requested through your correspondence.

Therefor, please submit a work plan by May 15, 1999. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions and or concerns, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files

AGENCY



DAVID J. KEARS, Agency Director

Ro# 489

Stid 780

March 16, 1999

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street Renton, Washington 98055-4931 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I am in receipt of your letter dated March 12,1999. I concur with your proposal stated in your letter. However, in addition, you need to submit a work plan to address the need to perform a grab groundwater sample and / or to install a monitoring well down gradient of well MW-6, the most down gradient well on this site. This will be necessary in order to confirm that the reduction in MTBE concentration is not due to its moving off site.

Please submit a work plan within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions and or concerns, please call me at (510)-567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files

AGENCY



DAVID J. KEARS, Agency Director

Ro# 489

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

Stid 780

March 8, 1999

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I sent you a letter on December 17, 1998 requesting a work plan to be submitted to this office within 30 days. This work plan was to address the need to perform a grab groundwater sample and / or to install a monitoring well down gradient of well MW-6, the most down gradient well on this site, in order to ensure that MTBE has not moved off site.

Additionally, I informed you of the need to perform EPA method 8260 to rule out false positive for MTBE, and to test for the presence of other oxygenates indicated in my letter dated December 17, 1998.

To this date, this office has not received the requested work plan.

Please submit a work plan within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

Please call me at (510) 567-6876, if you have any questions and or concerns.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files





DAVID J. KEARS, Agency Director R0#489

Stid 780

January 28, 1999

Mr. Scott Hooton BP Oil Company Environmental Remediation Management 295 SW 41st Street Renton, Washington 98055-4931 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office has received your letter dated January 28, 1999. In the letter you questioned the validity of the requested tests in the letter dated December 17, 1998. Enclosed please find "memorandum dated August 22, 1996", and "Guidance on Analytical Methods for Oxygenates and Additives at Gasoline UST Sites dated May 15, 1998" both form Cal/EPA. I believe these two documents will clarify your questions.

Therefor, please comply with the requests made by this office in the letter dated December 17, 1998 which includes performance of EPA method 8260 test for exclusion of false positive for MTBE, as well as testing for all oxygenated compounds, once, to ensure absence of the TAME, DIPE, ETBE, TBA, EDB, and EDC.

Please submit a work plan within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, please call me at (510) 567-6876.

Sincerely.

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files

ag780morinvst3

AGENCY



DAVID J. KEARS, Agency Director

Ro# 489

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700 FAX (510) 337-9335

Stid 780

January 25, 1999

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

I have received and reviewed the Groundwater Monitoring and Sampling Report dated January 8th, 1999. This report indicates that the MW-4, MW-5, MW-6, and MW-7 wells contain 550ppb, 340ppb, 1300ppb, 110 ppb of MTBE and 7.7ppb, 1.8ppb, 2.7ppb, and <0.5ppb of benzene respectively. There were few other contaminants, which were also found in some of the indicated wells. MW-6 well indicates higher MTBE level than the last report. This is probably due to MTBE plume traveling faster than other contaminants. I will be looking forward for the next report.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS

Hazardous Materials Specialist

C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files

ag780morinvst2



DAVID J. KEARS, Agency Director

Ro 489

ENVIRONMENTAL HEALTH SERVICES

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

Sid 780

December 17, 1998

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

RE: Former BP Oil Site No. 11107 at 18501 Hesperian Blvd., San Lorenzo, CA

Dear Mr. Hooton:

This office has assigned me to review the above referenced site. Having reviewed and discussed this case with other staff members, we concluded that there are two main issues at hand at the present time. Please address the following:

- 1. The contaminant concentrations have been diminishing including that of MTBE. Although there is a decrease in the concentration of MTBE, there is a concern about it moving off site especially since MTBE is a persistent chemical. To address this question we should first ensure that indicated MTBE level indicated by the lab analysis is not a false positive by performing "EPA method 8260". Once the MTBE level is accurately assessed using the above method, you need to perform a grab ground water sample and / or install a monitoring well down gradient of well MW-6, which is the most down gradient well on this site, to ensure that MTBE is not moving off site.
- 2. According to Cal /EPA's guidelines and Chuck Headlee of Regional Water Quality Control Board (RWQCB) you need to test for the presence of other oxygenated contaminants such as those of TAME, DIPE, ETBE, TBA, EDB, and EDC at least once to ensure absence of the indicated constituents.

As you are aware, all contaminant concentrations have diminished. However, the MTBE level was still as high as 1200 in MW-4 on 7/8/98, while other chemicals of concerns have diminished to an acceptable value.

Please submit a work plan within 30 days from the date of this letter. This is a formal request for technical information and hence any delays should be requested in writing.

If you have any questions, please call me at (510) 567-6876.

Sincerely,

Amir K. Gholami, REHS Hazardous Materials Specialist

C: Tina Berry, Tosco Marketing Company, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583 files

ag780morinvst

AGENCY



DAVID J. KEARS, Agency Director

Ro#489

ENVIRONMENTAL HEALTH SERVICES

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

May 19, 1998

ATTN: Mr Vince Padilla

A & S Engineering 207 W Alameda #203 Burbank CA 91502

RE: Project # 3818A - Type MOD

at 18501 Hesperian Blvd in San Lorenzo 94580

Dear Property Owner/Designee:

Our records indicate the deposit/refund account for the above project has fallen below the minimum deposit amount. To replenish the account, please submit an additional deposit of \$240.00, payable to Alameda County, Environmental Health Services, within two weeks of receipt of this letter.

It is expected that the amount requested will allow the project to be completed with a zero balance. Otherwise, more money will be requested or any unused monies will be refunded to you or your designee.

The deposit refund mechanism is authorized in Section 6.92.040L of the Alameda County Ordinance Code. Work on this project will be debited at the Ordinance specified rate, currently \$94 per hour.

Please be sure to write the following identifying information on your check: - project #

- type of project and

site address

(see RE: line above).

If you have any questions, please contact Amir Gholami at (510) 567-6876.

Sincerely,

Tom Peacock, Manager Environmental Protection

c: files

AGENCY



DAVID J. KEARS, Agency Director

R0#489

October 2, 1997 STID 780 ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION (LOP) 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Scott Hooton

BP Oil, Environmental Remediation Management 295 SW - 41st St. Renton, WA 98055-4931

re: BP Station, 18501 Hesperian Blvd., San Lorenzo, CA 94580

Dear Scott Hooton:

This office has received and reviewed a Groundwater Monitoring and Sampling Report dated April 21, 1997 by Alisto Engineering Group for the above site. The following comments concern this report:

- 1. There are high levels of MTBE in MW-4, MW-5, and MW-6. MW-5 and MW-6 are off-site wells and do not have other monitoring points downgradient from them. Further investigation may be warranted for the MTBE problem.
 - 2. This office will check our own records to see if there may be other sources of MTBE or monitoring points already installed in the immediate viscinity.

Please contact Brian Oliva, who will be taking over the site, if you have any questions regarding this letter at 567-6700.

Sincerely

Thomas Peacock, Manager

c: William Howell, Alisto Engineering Group, 1575 Treat Blvd., Suite 201, Walnut Creek, CA 94596

Ron Gehrke, Kwik G Enterprises, Inc., 19231 Lake Chabot Blvd., Castro Valley, CA 94612

TOSCO Northwest, 601 Union St., Suite 2500, Seattle, WA 98101

Gordon Coleman - Files

R0489

RAFAT A. SHAHID, Director

November 9, 1995

Tom Piskor, Project Manager A & S Engineering Inc. 45 Quail Ct. Suite 303 Walnut Creek, CA 94596

DAVID J. KEARS, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH Environmental Protection Division 1131 Harbor Bay Parkway, #250 Alameda, CA 94502-6577 (510) 567-6700

Subject:

Dispenser upgrade at BP station at 18501 Hesperian Boulevard, San Lorenzo, CA

되는 사람들은 높임

94580.

Dear Mr. Piskor:

As we discussed in our conversation this afternoon this department requires no permit for the dispenser upgrade as long as the concrete and the piping below the dispensers are not changed. It is my understanding is that the old dispensers will be detached and the new ones will simply be reattached in the same location with no change to the concrete or to the piping.

In accordance with the state this department will require the following if the concrete around the island is broken to install or modify product piping on or after August 1, 1995:

-Install a dispenser pan with a monitoring system that sets off a visible and audible alarm or shuts off the flow of product when it senses the presence of liquid.

As we discussed during our visit to the site with the engineers from Tosco, if the only break in the concrete is to run additional conduit to the dispensers then I will not require the installation of a dispenser pan.

Some additional information relevant to this site:

- The three tank systems are hybrid systems. They were installed during the period between January 1984 and July 1987. The tanks are double walled fiberglass, but the piping is single walled (fiberglass?) with no interstitial space to be monitored. There appears to be some evidence that there is a fiber liner below the piping. However, since it does not appear to direct leaking material to a monitored sump the fiber trench is **not considered secondary containment!**
- 2 The following monitoring is required of the hybrid tank systems:
 - Daily manual inventory control and monthly reconciliation
 - Annual tightness tests of the tanks
 - Annual tightness tests of the piping
 - Continuous monitoring of the interstitial space of the tank
 - Line leak detectors on the piping.

(Note: The tightness testing of the piping and of the tanks would not be required if the piping were double walled with monitoring of the interstitial space.

- 3- This site has contamination which is still showing up in the monitoring wells. There may be value to upgrading the system to assure that there is no additional contamination. For example, the lack of dispenser pans is more likely to allow contamination of the area below the dispensers in the case of a leak.
- 4- Required upgrades. (by December 22, 1998)
 - a- Provide evidence of striker plates below all openings which could be "sounded" with a stick.
 - b- Provide overfill protection on fill points.
 - c- Provide spill containment around the fills. The present galvanized spill buckets may not be adequate for tightness and corrosion protection. Provide 15 gallon containment.
 - d- If the piping is not secondarily contained then the line leak detector must be capable of shutting off the pump when a release occurs. Also the turbine must automatically shut down if the line leak detector fails or is disconnected. [Title 23, sec. 2666(c)]

Please call me at 567-6734 if I can be of further assistance.

Sincerely,

Don Atkinson-Adams

Senior Registered Environmental

Health Specialist #5485

enclosure

cc: Bill Raynolds, East Area Manager, ACDEH
Rob Weston, Senior Hazardous Materials Specialist, ACDEH

--

18501BP1.195

Lynn Chun, Environmental Compliance Specialist, Tosco Northwest Company, 601 Union Street, Suite 2500, Seattle, November 8, 1995 WA 98101

DAVID J. KEARS, Agency Director

R0489

RAFAT A. SHAHID, DIRECTOR

StId 780

October 2, 1995

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program
1131 Harbor Bay Parkway
Alameda, CA 94502-6577
(510) 567-6700

Scott Hooton BP Oil Company 295 SW - 41st St., Suite N Renton WA 98055

Chester Bennett Tosco Corporation 2130 Professional Dr., #100 Roseville CA 95661-3738

Subject: Required investigations at 18501 Hesperian Blvd., San Lorenzo, CA 94580

Dear Messrs. Hooton and Bennett:

This office has reviewed Alisto Engineering Group's Supplemental Site Investigation Report dated April 27, 1995. This investigation included the installation of three additional monitoring wells (MW-5, MW-6, and MW-7) and sampling of all new and pre-existing monitoring wells at the subject site.

As indicated in the report and discussed during a May 17, 1995 meeting with Mr. Hooton, a substantial increase of TPHg and BTEX concentrations were detected in groundwater samples collected from monitoring well MW-4, the well located in close proximity to and down gradient from the UST pit. Benzene was detected at 1,800 ppb at monitoring well MW-4 during March 1995; however, the highest benzene concentrations ever detected for MW-4 prior to this (since November 1992) was 150 ppb. In addition, the two new monitoring wells, MW-5 and MW-6, located down gradient from MW-4 exhibited 150 and 11 ppb benzene, respectively.

We discussed in our May 17th meeting that these results may indicate a new release and that a review of this station's recent UST reconciliation and tightness testing and future groundwater monitoring would confirm the validity of the March 1995 data. Don Atkinson-Adams of our office received "passing" Tank Tightness Testing Reports dated August 31, 1995 from Lynn Chun of Tosco for the subject site. UST manual inventory reconciliation from April 1994 through April 1995 was supplied to the office by Mr. Martig of Tosco. However, this reconciliation does not appear to be based on daily variations as required by California Code of Regulations, Title 23, Section 2646. Therefore, we are unable to confirm if the inventory records for this site reconcile properly. We request that Tosco re-evaluate the subject site's inventory records for the past year to verify if a recent release at this site has occurred and confirm your findings in writing to this office and BP Oil Company no later than October 16, 1995. Please contact Don Atkinson-Adams at (510)567-6734 if you have questions regarding inventory reconciliation requirements.

Hooton/Bennett

Re: 18501 Hesperian Blvd., San Lorenzo

October 2, 1995 Page 2 of 2

In addition, the most recent groundwater monitoring report(s) for this site were requested from BP Oil Company on August 16 and August 23, 1995. To date, we have not received any monitoring data since our receipt of the April 1995 report, or any communication in regard to further investigations at this site. Please be reminded that California Code of Regulations, Title 23, Division 3, Chapter 16, Article 5, Section 2652(d), requires the submittal of quarterly reports every 3 months (quarterly), at a minimum.

You are directed to submit the most recent quarterly monitoring report(s) for this site to this office by October 16, 1995. In the future, please submit a report of each quarterly monitoring event to this office the first day of the second month of each subsequent quarter until this site qualifies for final RWQCB "sign-off".

Thank you for your attention to these matters. Please contact me at (510)567-6755 if you have questions or need additional information.

Sincerely,

Amy Leech

Hazardous Materials Specialist

amy Seech

Hassan Yeylaghi, B.P., 18501 Hesperian Blvd., San Lorenzo, CA 94580
 Don Atkinson-Adams, ACDEH
 Gil Jensen, Alameda County District Attorney's Office

Acting Chief of Environmental Protection - File(ALL)

AGENCY



R0489

RAFAT A. SHAHID, DIRECTOR

August 17, 1995

STID 780

DEPARTMENT OF ENVIRONMENTAL HEALTH 1131 Harbor Bay Parkway Alameda, CA 94502-6577 (510) 567-6777

Lynn Chun, Environmental Compliance Specialist Tosco Northwest Company 601 Union Street Suite 2500 Seattle, Washington 98101

DAVID J. KEARS, Agency Director

Subject:

Annual tightness tests for underground tanks at B.P. Station, 18501 Hesperian

Boulevard, San Lorenzo, CA 94580.

Dear Ms. Chun:

Thank you for your voice mail response today. You are correct that the annual check of the interstitial space monitors was included in the packet from NDE. That requirement has been met for this year.

However, you are incorrect in your assertion that annual tightness tests are not required for the tanks. The San Lorenzo tank systems are classified by the State of California as "Hybrid" Tank Systems and thus additional monitoring is required. I have attached a copy of my explanation of "hybrid" tanks and of the legal path through the law and the regulations. You may contact David Holtry of the California State Water Resources Control Board for additional information (916-227-4332).

Please provide results of the tightness tests for the underground tanks located at the above address to this office by September 20, 1995. These tightness tests are one of the annual requirements of the 5 year permit which has been issued for this site. Please schedule these tests annually along with the line tightness testing.

Please call me at 510-567-6734 if you have any questions.

Sincerely.

Don Atkinson-Adams

Senior Registered Environmental

Health Specialist #5485

enclosure

cc Bill Raynolds, East Area Manager

Robert Weston, Senior Hazardous Materials Specialist

Amy Leech, Local Oversight Program

Hassan Yeylaghi, B.P., 18501 Hesperian Blvd., San Lorenzo 94580

18501HE2.895

DAVID J. KEARS, Agency Director



R0489

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
State Water Resources Control Board
Division of Clean Water Programs
UST Local Oversight Program

February 14, 1995

Scott Hooton BP Oil Company 295 SW - 41st St., Suite N Renton WA 98055

Chester Bennett Tosco Corporation 3100 Zinfandel Dr., #200 Rancho Cordova CA 95670 Alameda County CC458 Environmental Protection Division 1131 Harbor Bay Parkway, Room 250 Alameda CA 94502-6577

Subject: Required investigations at 18501 Hesperian Blvd., San Lorenzo, CA 94580

This office is in receipt of Groundwater Monitoring and Sampling Reports, dated November 8, 1994 and December 21, 1994, and a letter from Scott Hooton of BP Oil Company, dated November 22, 1994 regarding the subject site.

Per Mr. Hooton's letter dated November 22, 1994, BP Oil Company has been granted access to install monitoring wells and conduct periodic groundwater monitoring and sampling at the adjoining downgradient property. BP Company submitted a work plan to this office dated June 3, 1993, prepared by Alisto Engineering which was subsequently approved by this office with conditions on July 16, 1993 (see attached letter). This work plan was submitted to satisfy regulatory requirements to further delineate the extent of groundwater contamination at the subject site.

Mr. Hooton asked this office to review recent sampling data to determine if the work proposed in the June 3, 1993, work plan was still necessary. Based on the data collected thus far, there is no evidence to support how far the contaminant plume has migrated off site. We assume you concur with this fact, since your consultant, Alisto Engineering Group, notified this office today that work will commence as indicated in the proposed work plan on February 15, 1995. A report must be submitted within 45 days after the completion of this phase of work at the site.

This office approves your proposal to decrease sampling of MW-1, MW-2, and MW-3 from quarterly to semi-annual events.

Hooton/Bennett 18501 Hesperian Ave. February 14, 1995 page 2 of 2

However, MW-1, the well located nearest to the used oil tank, must be analyzed for cadmium, chromium, lead, zinc, nickel, PCB, PNA, and creosote, in addition to TPHg, TPHd, BTEX, Chlorinate Hydrocarbons, and Oil and Grease, in the next round of sampling as stipulated in the July 16th letter.

Lastly, this office has previously outlined to you why monthly water level measurements are initially required when assessing the extent of contaminant migration in ground water. The decision to require monthly measurements the first year of monitoring, is not arbitrary. Our experiences have shown that more frequent elevation monitoring assists in revealing subtle, and not so subtle, fluctuations in flow direction across a site that would otherwise not be revealed following a less frequent schedule. The more we know (i.e. the more data we gather) about a site, the better informed our decisions in directing the scope of future work, or evaluating a site for closure. Please find attached a case example that shows how frequent elevation monitoring can reveal dramatic fluctuations in groundwater flow direction that might not otherwise be initially revealed in a quarterly monitoring schedule. Please be reminded that the assigned sampling frequency and monitoring are determined by the regional board or other supporting agency. We would appreciate your cooperation in this matter when conducting initial investigations at future sites.

In regard to this site, progress toward delineating the extent of the contaminant plume has been unusually slow due to the lack of timely compliance to regulatory requirements. For this reason, we have collected data, from five sampling events over a two year period, to show that the direction of groundwater flow has been consistently west-northwest. At this point, this office requires that you conduct water level measurements and corresponding ground water gradient determinations and sampling of MW-4 and the three other proposed wells on a quarterly basis.

If you have questions or comments, please contact me at (510)567-6755.

Singerely,

Hazardous Materials Specialist

ATTACHMENTS

cc: Gil Jensen, Alameda County District Attorney's Office

Ed Howell

DAVID J. KEARS, Agency Director

R0489

RAFAT A. SHAHID, ASST. AGENCY DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH

State Water Resources Control Board Division of Clean Water Programs UST Local Oversight Program

> 80 Swan Way, Rm 200 Oakland, CA 94621

> > (510) 271-4530

June 13, 1994

Mr. Scott Hooten
BP Oil Company
Environmental Resource Management
Building 13, Suite N
295 SW 41st Street
Renton, WA 98055-4951

STID 780

Re: Investigations at BP Oil Site No. 11107, located at 18501 Hesperian Avenue, San Lorenzo, California

Dear Mr. Hooten,

I am in receipt of your June 4, 1994 correspondence (refer to attached copy) submitted in response to the County's May 5, 1994 letter. It is the understanding of this office that BP Oil Company is currently diligently pursuing an access agreement from Mr. Ron Gehrke, in order to implement the required investigations at the above site. Please keep this office updated on BP's efforts to obtain the access agreement and implement the work.

As stated in our May 5, 1994 letter to your office, you are required to conduct monthly water level measurements and corresponding groundwater gradient determinations, in conjunction with the required quarterly monitoring, for twelve consecutive months. Monthly gradient determinations will more accurately characterize the behavior of ground water flow at the site, and, therefore, provide a more accurate characterization of the potential migration pathways of the contaminant plume.

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

Sincerely,

Ĵuliet Shin

Hazardous Materials Specialist

Attachment

Mr. Scott Hooten

Re: 18501 Hesperian Ave.

June 13, 1994 Page 2 of 2

cc: Gil Jensen, Alameda County District Attorney's Office

Ted Moise Alisto Engineering Group 1777 Oakland Blvd., Ste 200 Walnut Creek, CA 94596

Mr. Ron Gehrke 19231 Lake Chabot Road Castro Valley, CA 94546

Roger M. Hughes Bell, Rosenberg & Hughes P.O. Box 70220 Station "D" Oakland, CA 94612-0220

Edgar Howell-File(JS)

DAVID J. KEARS, Agency Director

R0489

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

May 5, 1994

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

STID 780

Re: Required investigations at BP Oil Facility No. 11107, located at 18501 Hesperian Avenue, San Lorenzo, California

Dear Mr. Hooton,

In October 1992, four exploratory soil borings were drilled at the above site and converted into monitoring wells (MW-1 through MW-4). Elevated levels of Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were identified in both the soil and ground water samples collected from MW-3 and MW-4. Consequently, Alisto Engineering (Alisto) submitted a work plan in June 1993, addressing the installation of additional monitoring wells to delineate the extent of soil and ground water contamination.

This office approved the work plan on July 16, 1993, and according to the work plan, a report documenting the work would be submitted within 75 days after the County's approval of the plan. By October 1, 1993, this office had not received this report, or any communication as to the status of work at the site. On October 12, 1993, this office sent you another letter requiring you to submit the report documenting the implementation of the work plan. By March 1, 1994, this report had not been submitted, nor had this office received any communication offering an explanation as to the delinquent report, or information on the status of the site.

Consequently, I contacted your consultant Alisto. Per my conversation with Ted Moise, Alisto, on March 1, 1994, BP was having difficulties obtaining an access agreement from one of the neighboring sites, specifically, Ron Gehrke's property. I contacted Mr. Gehrke by phone and letter on March 1, 1994, and explained the need for BP to install a well on his property. In response to my letter and BP's proposed access agreement, Mr. Gehrke's attorney, Roger Hughes, submitted a letter to BP on March 25, 1994 with comments on some aspects of BP's access agreement (refer to attached copy). To this date, BP has not responded to Mr. Gehrke's letter.

Scott Hooton
Re: 18501 Hesperian Blvd.
May 5, 1994
Page 2 of 2

You are required to diligently pursue resolution of the access agreement, and implement the work plan within 60 days of the date of this letter. A report documenting this work shall be submitted within 45 days after completing field activities.

Lastly, BP is delinquent in complying with the quarterly monitoring and reporting requirements. Per our files, no ground water sampling has been conducted out at the site since the initial round of sampling conducted in October 1992. Per Article 5, Title 23 California Code of Regulations, and the Regional Water Quality Control Board's guidelines, you are required to implement quarterly monitoring and reporting. The next quarterly ground water monitoring report is due to this office within 45 days of the date of this letter. In addition to the quarterly sampling requirements, you are required to conduct monthly water level measurements and corresponding ground water gradient determinations for twelve consecutive months, and quarterly thereafter, to establish the full range of potential ground water gradient directions out at the site.

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Gil Jensen, Alameda County District Attorney's Office

Ted Moise Alisto Engineering Group 1777 Oakland Blvd., Ste 200 Walnut Creek, CA 94596

Mr. Ron Gehrke 19231 Lake Chabot Road Castro Valley, CA 94546

Roger M. Hughes Bell, Rosenberg & Hughes P.O. Box 70220 Stationd "D" Oakland, CA 94612-0220

Edgar Howell-File(JS)

LAW OFFICES

ALCO HAZMAT

BELL, ROSENBERG & HUGHES 21741

1300 CLAY STREET, SUITE 1094 MAR 28 PM 1: 53
P.O. BOX 70220 STATION "D"

OAKLAND, CALIFORNIA 94612-0220

JAMES DUNLAVEY

TELEPHONE (510) 832-8585

TELECOPIER (510) 839-6925

*CERTIFIED SPECIALIST-PROBATE, ESTATE PLANNING & TRUST LAW THE STATE BAR OF CALIFORNIA BOARD OF LEGAL SPECIALIZATION

JENNIFER M. V. BERGSTROM

HOWARD H. BELL

ROLAND NIKLES

JOSEPH A. CREITZ

ROBERT ROSENBERG*

CATHERINE M. FISHER JOHN H. BANISTER

TERESA JENKINS MAIN HOWARD G. CURTIS

ROGER M. HUGHES JAMES C. NELSON

March 25, 1994

VIA FACSIMILE and FIRST CLASS MAIL

H.W. Pearsall Environmental Coordinator BP OIL COMPANY 200 Public Square Cleveland, Ohio 44114-2375

18501 Hasponain Ban Lovenzo

Re: Access Agreement to Property Adjacent to BP Site #11107

Dear Mr. Pearsall:

Bell, Rosenberg & Hughes is counsel to the Gehrke Trust. In that capacity, we have been asked by Mr. Gehrke to respond to your letters of December 3 and December 10, 1993, addressing a proposed agreement to govern BP Oil's desires to conduct work on the trust property.

Mr. Gehrke wishes to be cooperative and allow the work to proceed as expeditiously as possible. To that end, we have restricted our comments to the minimum necessary to achieve a document that we can advise Mr. Gehrke to sign. Our comments correlate to the paragraph numbers of the proposed agreement.

- 1. In the fifth and sixth lines of paragraph 1, strike the words "be permitted to" and at line 10 add the sentence, "Licensee shall not proceed with any portion of the work without (a) providing Licensor with at least 48 hours prior written notice of the work, including the expected start date, completion date and a description of the work intended to be undertaken and (b) receiving Lessor's approval of the proposed work.
- 2. End paragraph 2 with the word "Licensee" and strike the remaining clause which reads "which agreement shall not be unreasonably withheld or delayed." Add as the last sentence to paragraph 2, "The approximate agreed upon location of the monitoring wells shall be identified on a plot map similar to Exhibit "A" and the location will be initialed by representatives of each party prior to the start of work."

H.W. Pearsall March 25, 1994 Page 2

- 3. Paragraph 3 should be changed to read "Licensee shall provide the Licensor, within 10 days after Licensee's receipt of same, copies of reports which result from work on the property."
- 4. In line 4 immediately after the words "personal injury" add the words "damage to business."
- 5. Add as the last sentence of paragraph 5, "Licensee shall reimburse Licensor its attorneys fees incurred in the review and negotiation of this agreement in an amount not to exceed \$500."
- 6. Add at the end of the first sentence of paragraph 6 the words "and Licensee shall take all reasonable steps to minimize impact to or restriction of Licensor's customary business activities and to minimize inconvenience to Licensor's customers."
- 7. After the first clause of paragraph 7 which reads "upon completion of the work and/or remediation," add the words "which in no event shall extend beyond three years of the date of this agreement."

I look forward to bringing this matter to a prompt conclusion.

Very truly yours,

BELL, ROSENBERG & HUGHES

Roger M. Hughes

Roger M. Hughes

RMH:ch

cc: Ron Gehrke Juliet Shin

[6587.001\pear0310.ltr]

DAVID J. KEARS, Agency Director

R0489

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

March 1, 1994

Mr. Ron Gehrke 19231 Lake Chabot Road Castro Valley, CA 94546

STID 780

Re:

Access permission for the installation of one monitroing well by BP Oil Company, located at 18501 Hesperian Blvd., San Lorenzo, California

Dear Mr. Gehrke,

Per our conversation on March 1, 1994, an environmental investigation has been in progress at the referenced BP service station (BP), neighboring your site. The investigation was warranted as a result of an unauthorized release of petroleum products from the underground storage tanks at the BP site into the soil and ground water beneath the site, and possibly off site.

BP is required to conduct investigations to determine the extent and severity of soil and ground water contamination resulting from its site. BP has proposed to install one monitoring well on your property, which lies within the projected downgradient direction from the observed release. Installing this well on your property is crucial to delineating the extent of the observed ground water contaminant plume.

Per our conversation, please be warned that should an access agreement not be reached in the near future, and BP is not given access to investigate your property, you may be shouldered with the responsibility of investigating and remediating any contamination on your property, resulting from the BP site. The Regional Water Quality Control Board (RWQCB), pursuant to their authority under Section 13267 of the California Water Code, could require the party or parties responsible for your parcel to conduct their own investigation, at their expense. Failure to meet RWQCB investigation and reporting schedules could result in the imposition of fines of up to \$1,000 per day of delinquency.

Lastly, the longer it takes to fully investigate the ground water contaminant plume, the more likely it is that the plume may migrate further downgradient and onto your property. Therefore, it is in BP's and your best interest to work out an access agreement as soon as possible.

Mr. Ron Gehrke

Re: 18501 Hesperian Blvd.

March 1, 1994 Page 2 of 2

Thank you for your time and cooperation. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Ted Moise

Alisto Engineering Group 1777 Oakland Blvd., Ste 200 Walnut Creek, CA 94596

Edgar Howell-File(JS)



DAVID J. KEARS, Agency Director

December 28, 1993

CERTIFIED MAILER #: P 422 218 162

BP Oil Co. Site #11107 18501 Hesperian Blvd. San Lorenzo, 94580 RAFAT A. SHARID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH Hazardous (Materials Division 30 Swen Way, Rm. 200 Oakland, CA 94621 (510) 271-4320

Re: FIVE-YEAR PERMITS FOR OPERATION OF UNDERGROUND STORAGE TANK(S) 18501 Hesperian Blvd. San Lorenzo, 94580

Dear Owner/Operator:

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

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

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

Sincerely

PAM EVANS

Sr HazMat Specialist

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

DAVID J. KEARS, Agency Director



R0489

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

October 12, 1993

Mr. Scott Hooton BP Oil Company 16400 SouthCenter Pkwy., Ste 301 Tukwila, Washington 98188

STID 780

Re:

Report for investigations at BP Oil Facility #11107, located at 18501 Hesperian Blvd., San Lorenzo, California

Dear Mr. Hooton,

In a letter dated July 16, 1993, this office approved a work plan for the installation of three additional ground water monitoring wells at the above site. According to the work plan, it was stated that a report documenting the work at the site would be submitted within 75 days after written approval of this plan by To this date, this office has not received this the County. report.

You are required to submit a report documenting the work at the site within 30 days of the date of this letter. If you have any questions or comments, please contact me at (510) 271-4530.

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc:

Brady Nagle

Alisto Engineering Group 1777 Oakland Blvd., Ste 200 Walnut Creek, CA 94596

Edgar Howell-File(JS)

DAVID J. KEARS, Agency Director

R0489 ;

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

July 16, 1993

Mr. Scott Hooton BP Oil Company 16400 SouthCenter Pkwy., Ste 301 Tukwila, Washington 98188

STID 780

Re: Work plan for Supplemental Site Investigations at BP Oil Facility #11107, located at 18501 Hesperian Blvd., San Lorenzo, California

Dear Mr. Hooton,

This office has reviewed Alisto Engineering's work plan, dated June 3, 1993, for investigations at the above site. This work plan is acceptable with the following requirements:

- o Ground water samples collected from Well MW-1, the well located nearest to the used oil tank, are required to be analyzed for cadmium, chromium, lead, zinc, nickel, and PCB, PCP, PNA, and creosote, in addition to TPHg, TPHd, BTEX, Chlorinate Hydrocarbons, and Oil and Grease, using the appropriate methods. If none of these constituents are detected in the next round of ground water sampling, you will not be required to analyze for them in the following sampling events;
- o Wells must screen adequately above the water table; and
- A minimum waiting period of 24 hours is required before wells can be developed.

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

Singerely,

Juliet Shin

Hazardous Materials Specialist

Mr. Scott Hooton

Re: 18501 Hesperian Blvd.

July 16, 1993 Page 2 of 2

cc: Richard Hiett, RWQCB

Brady Nagle Alisto Engineering Group 1777 Oakland Blvd., Ste 200 Walnut Creek, CA 94596

Edgar Howell-File(JS)

DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, ASST, AGENCY DIRECTOR

April 14, 1993

Mr. Scott Hooton BP Oil Company 16400 SouthCenter Pkwy., Ste 301 Tukwila, Washington 98188

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

R0489

STID 780

Investigations at BP Service Station No. 11107, located at Re: 18501 Hesperian Blvd., San Lorenzo, California

Dear Mr. Hooton,

This office has recently received and reviewed Alisto Engineering's Preliminary Assessment Report, dated January 1993, for the above site. According to the investigations documented in this report, Total Petroleum Hydrocarbons as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) have been identified in the soil and ground water beneath the site. analysis of ground water samples collected from Well MW-4 identified 900 ppb TPHg and 150 ppb benzene, and water samples collected from Well MW-3 identified 760 ppb TPHg and 3.7 ppb Additionally, 1,1,1-TCA was detected in the ground water sample collected from Well MW-1, near the waste oil tank, at 2.8 ppb.

Per Section 2724, Article 11, Title 23 California Code of Regulations (CCR), the above unauthorized release requires that you continue to conduct investigations at the site. Per Section 2725 (a)(c), Article 11, Title 23 CCR, these investigations will include the assessment of the nature and vertical and lateral extent of the unauthorized release, and the eventual submittal of a Corrective Action Plan. Per the above regulations, you are required to submit a work plan to this office addressing the further delineation of the extent of ground water contamination at the site within 60 days of the date of this letter.

Lastly, quarterly monitoring and reporting shall continue at the site, per Section 2652, Article 5, Title 23 CCR, until this site qualifies for closure by the Regional Water Quality Control Board (RWQCB).

Please be reminded to copy Richard Hiett, RWQCB, on all correspondence and reports regarding this site.

Mr. Scott Hooton

Re: 18501 Hesperian Blvd.

April 14, 1993 Page 2 of 2

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

Sincerely,

Juliet Shin

Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

> Brady Nagle Alisto Engineering Group 1777 Oakland Blvd., Ste 200

Walnut Creek, CA 94596

Edgar Howell-File(JS)



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

July 8, 1992

Pete DeSantis BP Oil Co. 2868 Prospect Park Dr. #360 Rancho Cordova CA 94560 Attn:

RE: FIVE YEAR UNDERGROUND STORAGE TANK OPERATING PERMIT
BP Oil Facility No 11107, 18501 Hesperian Blvd., San Lorenzo

Dear Mr. DeSantis:

Please find enclosed a five year permit to operate four underground petroleum storage tanks (USTs) at the above referenced facility. These USTs are double walled fiberglass with trench-lined single walled pressure piping. To operate under a valid permit, you are required to comply with the conditions as described in revised Title 23, California Code of Regulations (CCR).

Consult the revised Title 23, CCR for additional requirements. To obtain a copy of the regulations, you may contact the State Water Resources Control Board at (916) 657-0917.

You may contact me with any questions at (510) 271-4320.

Sincerely,

Pamela J. Eváns

Senior Hazardous Materials Specialist

c: Brian Oliva, ACHCSA James Ferdinand, Eden Consolidated Fire Protection District Certifed Mailer #: P 062 128 218

September 13, 1991

DEPARTMENT OF ENVIRONMENTAL MEALTH Hazardous Melevisis Program 80 Swan Way, Tim. 200 Oakland, CA 94521 (415)

BP 0il Co. 18501 Hesperian Blvd. San Lorenzo, CA 94580 Attn: Hassan Yeylaghi

BECOND NOTICE OF VIOLATION

SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks at BP Oil Company, Facility #11107, 18501 Hesperian Blvd. San Lorenzo, California 94580

Dear Mr. Yeylaghi:

On July 24, 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, Mr. Fong 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 HASC 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:
 - Routine Monitoring Plan A proposed written routine monitoring was submitted

18501 Hesperian Blvd. September 13, 1991 Page 2 of 7

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

18501 Hesperian Blvd. September 13, 1991 Page 3 of 7

- routine 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 -
 - Underground Tanks and Piping This is not part of a routine monitoring procedure and should be deleted from the proposed plan.
 - 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:

- Locations of probes in the interstitial space(s) where electronic monitoring device(s) (e.g. Leak Alert , etc.) monitor for leaks - whether probes are installed in the interstitial space of tank(s), piping, sumps, island trench, etc.;
- 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. <u>Spill/Leak Response Plan</u> The proposed spill/leak response plan submitted contains insufficient information. The following information must be included in the plan:

18501 Hesperian Blvd. September 13, 1991 Page 4 of 7

- 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;
- 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:

 Section 2632(e)(2). Title 23. CCR - The spill/leak response plan should demonstrate that any unauthorized release will be removed. 18501 Hesperian Blvd. September 13, 1991 Page 5 of 7

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.

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

18501 Hesperian Blvd. September 13, 1991 Page 6 of 7

- 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
 - 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. Fitle 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.)

18501 Hesperian Blvd. September 13, 1991 Page 7 of 7

- 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 1987, 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 interstital space.

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.

Pailure 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.

Singerely,

Thomas Peacock

Sr. Hazardous Materials Spec.

FYF; fyf

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 NEALTH!
Hazardous Meterials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

July 29, 1991

Mr. Hassan Yeylaghi BP Oil Co. 1850l Hesperian Blvd. San Lorenzo, CA 94580

NOTICE OF VIOLATION

SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks at BP Oil Company Facility #11107, 18501 Hesperian Blvd. San Lorenzo, California 94580

Dear Mr. Yeylaghi:

On July 24, 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 underground storage tanks (three fuel and one double-walled waste oil) exist at the subject facility. During this inspection, Mr. Fong noted the following violations of Title 23, California Code of Regulations (CCR) and California Health and Safety Code (H&SC):

1) Section 2643, CCR and Section 25292 of MASC - This office has not received copies of annual automatic line leak detector test and annual tightness test results for pressurized piping. Per the above sections, the under-ground storage tank owner is required to have the automatic line leak detector and underground pressurized piping tightness tested annually. Please provide our office with the results of automatic line leak detection tests and pipeline leak detection tests.

3315 High Street, Oakland July 29, 1991 Page 2 of 3

- 2) For the double-walled tanks which were installed in 1986, you are required to submit the following items:
 - a) Initial tank and pipeline precision test results, per section 2635(7), CCR and Section 25289(b) of the Health and Safety Code;
 - b) A written routine monitoring procedure/plan per Section 2632(d)(1) or 2634(d)(2), Title 23, CCR, which includes, where applicable: the frequency of performing the monitoring method, the methods and equipment to be used for monitoring, where monitoring will be performed, the location(s) from which the monitoring will be performed, the name(s) or title(s) of the person(s) responsible for performing the monitoring and/or maintaining the equipment, and the reporting format;
 - c) A written spill/leak response plan per Section 2632(d) (2), Title 23, CCR. This plan should demonstrate that in the event of an unauthorized release, product would be removed from the secondary container within the shortest possible time. It should include at least the following:
 - A description of the proposed methods and equipment to be used for removing the waste oil, including the location and availability of the required equipment, if not permanently on-site, and an equipment maintenance schedule for the equipment located on-site.
 - 2) The name(s) or title(s) of the person(s) responsible for authorizing the work to be performed.

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 within 10 days, i.e. no later than August 5, 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.

3315 High Street, Oakland July 29, 1991 Page 3 of 3

Failure to respond in a timely menner 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 either Young Fong or myself, at (415) 271-4320.

Sincerely,

Vhomas Deard

Thomas Peacock, Sr. Hazmat Specialist Hazardous Materials Division

FYF: fyf

cc: Lou Parisi, BP Oil Company

Gil Jensen, Alameda County District Attorney, Consumer and

Environmental Protection Division

Files

DAVID J. KEARS, AGENCY



Department of Environmental Health Hazarders Materials Division 80 Swar Vay, Room 200 Oakland, CA 94621

R0489

CXMXNXXXXX, Agency Director

Certified Mailer #: p 833 981 182

Telephone Number:(415)

271- 4320

February 21, 1989

Mr. H. D. Yeyiaghi, Dealer San Lorenzo Mobil 18501 Hesperian Blvd. San Lorenzo, Ca. 94580

Subject: Underground Tank Permit Applications for San Lorenzo Mobil, 18501 Hesperian Blvd., San Lorenzo

Dear Mr. Yeyiaghi:

We have reviewed our files on San Lorenzo Mobil located at 18501 Hesperian Blvd. in San Lorenzo. Our records indicate a discrepancy as to the type and number of underground storage tanks at this facility. We therefore request 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);
- 2) Underground Storage Tank Program Form B (one for each existing underground tank on site); and
- 3) Documentation of any Underground Storage Tank or Tank piping removals, installations or repairs that have occurred since September 1987.

Copies of the forms are enclosed. Please 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, Chief,

Hazardous Materials Division

RAS: kac

cc: Frank Narciso, Mobil Oil Corporation, Owner
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Agency
Katherine Chesick, A.C. Hazardous Materials Division
Files