

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



11-1-01

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

October 31, 2001
StID # 1771/RO000051

BP Oil Company
Mr. Scott Hooten
Bld. 13, Suite N
295 SW 41st St.
Renton, WA 98055

**SUBJECT: INTENT TO MAKE A DETERMINATION THAT NO FURTHER ACTION IS REQUIRED
OR ISSUE A CLOSURE LETTER FOR 3255 McCartney Rd., Alameda, CA 94501**

Dear Mr. Hooten:

This letter is to inform you that Alameda County Environmental Protection (LOP) intends to make a determination that no further action is required at the above site or to issue a closure letter. Please notify this agency of any input and recommendations you may have on these proposed actions within 20 days of the date of this letter.

In accordance with section 25297.15 of Ch. 6.7 of the Health & Safety Code, you must provide certification to the local agency that all of the current record fee title owners have been informed of the proposed action. You may use the enclosed Example letter #3 as a guide. Please provide this certification to this office within 20 days of the date of this letter.

If you have any questions about this, please contact me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

Enclosure (sample letter #3)

c: B.Chan,files

SAMPLE LETTER 3: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

SUBJECT: NOTICE OF PROPOSED ACTION SUBMITTED TO LOCAL AGENCY (FOR NAME AND ADDRESS OF SUBJECT SITE)

In accordance with section 25297,15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. Check space for applicable proposed action(s):

- cleanup proposal (corrective action plan)
- site closure proposal
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

Sincerely,

Signature of primary responsible party

Name of primary responsible party

cc: Names and addresses of all record fee title owners

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



03-08-07

20611

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

March 6, 2001
StID # 1771

Mr. Scott Hooton
BP Amoco Oil Corporation
295 SW 41st St., Bld 13, Suite N
Renton, WA 98055

Re: Former BP Oil, 3255 McCartney Road, Alameda, CA 94501

Dear Mr. Hooton:

Please be aware that Mr. Larry Seto has been transferred to another program within our office and I will be the new case worker. I have reviewed the case file and discussed the site with Mr. Seto and would like to clarify our office's opinion. There has been disagreement as to whether additional off-site characterization is necessary. In consultation with Mr. Roger Brewer of the Water Board, he suggested that the extent of the TPHg and MTBE be determined, in addition to performing an evaluation of indoor air exposure to nearby buildings, potential impact to aquatic life and the potential of nuisance conditions. This may be done by using the Water Board document, Application of Risk-Based Screening Levels and Corrective Action to Sites With Contaminated Soil and Groundwater. Even though the groundwater is not considered potable, these items still need consideration.

In lieu of performing additional off-site groundwater and vapor sampling, continued semi-annual monitoring must be performed on wells MW-6, MW-7 and XW-3 along with groundwater elevation and gradient determination using data from all wells. Your next monitoring event should be performed in March 2001.

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

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

C: B. Chan, files

Ms. Tina Berry, Tosco, 2000 Crow Canyon Place, Suite 400, San Ramon, CA 94583

Stat3255McCartney

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



508 8-14-2m
Ro# 511

August 14, 2000

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

Mr. Scott Hooton
BP Amoco Oil Corporation
295 SW 41st Street
Building 13, Suite N
Renton, WA 98055
STID 1771

RE: Former BP Oil, 3255 McCartney Road, Alameda, CA 94501

Dear Mr. Hooton:

I was at the above site on August 3, 2000 and noticed that the cover for monitoring well MW-7 was not bolted down. (See enclosed photograph) In addition, the area around the cover has been damaged. Please have your contractor inspect this well, repair any damages, and bolt down the cover to this well.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Enclosure (1) Photograph of damaged monitoring well

Cc: Francis Thie, Blaine Tech Services, 1680 Rogers Avenue, San Jose, CA
95112-1105

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



SENT 7-20-2000

ROSII

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

July 19, 2000

Mr. Scott Hooton
BP Amoco Oil Corporation
295 SW 41st Street
Building 13, Suite N
Renton, WA 98055
STID 1771

RE: Former BP Oil, 3255 McCartney Road, Alameda, CA 94501

Dear Mr. Hooton:

In your letter dated May 30, 2000 you mentioned the average total dissolved solids (TDS) concentrations in the groundwater at the site are over two times higher than the 3,000 mg/l TDS ceiling that defines a present or future beneficial use aquifer. It was unclear to you why this office requested a workplan to define the extent of the methyl tertiary butyl ether (MTBE) plume before site closure could be obtained.

Regional Water Quality Board San Francisco Bay Region will not sign off to close a site until the plume beneath the site has been fully characterized, and has stabilized or is shrinking in size. In addition, there is a surface body of water approximately 500 feet downgradient from the site as identified in your sensitive receptor survey. Ecological receptors must be protected.

Monitoring wells MW-6, MW-7 and XW-3 should be monitored and sampled on a semi-annual schedule as per my letter dated March 21, 2000. The Regional Board requires that groundwater samples be tested for the presence of oxygenates. Commencing in the next round of sampling, please test for the presence of MTBE, tertiary butyl alcohol (TBA), tertiary amyl methyl ether (TAME) and ethyl tertiary butyl ether (ETBE) using EPA Method 8260. (Significant interference and false positives for MTBE can occur in the presence of petroleum hydrocarbons using EPA Method 8020/8021).

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto

Sr. Hazardous Materials Specialist

Mr. Scott Hooton
BP Amoco Oil Corporation
295 SW 41st Street
Building 13, Suite N
Renton, WA 98055
Page 2 of 2

Cc: Tina Berry, Tosco, 2000 Crow Canyon Place, Suite 400, San Ramon,
CA 94583
Chuck Headlee, RWQCB, 1515 Clay Street, Suite 1400, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



SENT INCLD cc IS
3-22-2000

20511

March 21, 2000

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

Mr. Scott Hooton
BP Oil
Environmental Remediation Management
295 SW 41st Street, Building 13, Suite N
Renton, WA 98055-0689
STID 1771

RE: Former BP Oil Station, 3255 McCartney Road, Alameda, CA 94502

Dear Mr. Hooton:

I have reviewed your 1st Quarter 2000 monitoring report for the above site and request for site closure. Semi-annual sampling for the presence of TPH(gas), BTEX, and MTBE in monitoring wells MW-6, MW-7 and XW-3 should continue. The MTBE concentrations in the most recent samplings have declined, but this trend has to continue for a longer length of time. In addition, before site closure status can be obtained the MTBE plume has to be completely defined. A method that can be used to meet this requirement is by collecting a series of groundwater samples downgradient from the site using the hydropunch technique.

Please submit your workplan to define the extent of the MTBE plume.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Tina Berry, Tosco, 2000 Crow Canyon Place, Suite 400, San Ramon,
CA 94583
Chuck Headlee, RWQCB, 1515 Clay Street, Suite 1400, Oakland, CA 94612
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Sent 11-8-99
Including cc's

20511

November 8, 1999

ENVIRONMENTAL HEALTH SERVICES

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

Mr. Scott Hooton
BP Oil
Environmental Remediation Management
295 SW 41st Street
Building 13, Suite N
Renton, WA 98055-4931
STID 1771

RE: Former BP Oil, 3255 McCartney Road, Alameda, CA 94501

Dear Mr. Hooton:

Mr. Chuck Headlee with the Regional Water Quality Control Board and I have reviewed the Third Quarter 1999 Groundwater Monitoring Report prepared by Blaine Tech Services for the above site. At this time, there is no evidence that the MTBE plume has stabilized, or has been completely defined. In order to obtain closure at this site, at a minimum the following is required:

- 1) Proof that the MTBE plume has stabilized. Further investigation may be necessary;
- 2) A graph with concentration vs. time must be plotted for all contaminants;
- 3) A graph with concentration vs. distance must be plotted for all contaminants; and
- 4) Determination if there are any downgradient sensitive receptors, and their distance from the site

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Chuck Headlee, RWQCB, 1515 Clay Street, Suite 1400, Oakland, CA 94612
Tina Berry, Tosco, 2000 Crow Canyon Place, Suite 400, San Ramon,
CA 94583

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RO# 511

April 1, 1999

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

Ms. Tina Berry
Tosco Marketing Company
2000 Crow Canyon Place, Suite 400
San Ramon, CA 94583

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

RE: 3255 McCartney Road, Alameda, CA

Dear Ms. Berry and Mr. Hooton:

I have reviewed the most recent Groundwater Monitoring and Sampling Report submitted to this office dated July 16, 1998 that was prepared by Alisto Engineering Group. Groundwater samples from monitoring wells MW-6, MW-7 and XW-3 historically contains very high levels of MTBE. Quarterly monitoring and sampling of these three wells must commence immediately, and continue until further notice. The samples must be tested for the presence of TPH(gas), BTEX and MTBE.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,


Larry Seto
Sr. Hazardous Materials Specialist

Cc: Alameda Fire, 1300 Park Street, Alameda, CA 94501
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



RO#511

November 23, 1998

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

Ms. Tina Berry
Tosco Marketing Company
2000 Crow Canyon Place, Suite 400
San Ramon, CA 94583

RE: Tosco BP Service Station, 3255 McCartney Road, Alameda, CA 94501

Dear Ms. Berry:

I have reviewed the underground storage tank (UGT) removal report dated October 23, 1998 prepared by Environmental Resolutions for the 1,000 gallon used oil UGT that was removed on July 9, 1998. At this time, this office is not requiring a subsurface investigation.

If you have any questions, please contact me at (510)567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Robert Weston, Alameda County Environmental Health
Scott Hooton, BP Oil Company, 295 SW 41st Street, Building 13, Suite N,
Renton, WA 98055-4931

Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

RO# 511

Certified Mailer # P 143 589 379

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

August 19, 1998

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

Ms. Tina Berry
Tosco
2000 Crow Canyon Place, Suite 400
San Ramon, CA 94583
STID 1771

RE: Former BP Oil Site # 11270, 3255 McCartney Road, Alameda, CA

Dear Ms. Berry and Mr. Hooton:

I have reviewed the Groundwater Monitoring and Sampling Report dated July 16, 1998 that was prepared by Alisto Engineering Group. Groundwater samples from monitoring wells, MW-6, MW-7 and XW-3 continues to have very high concentrations of MTBE. The concentrations of MTBE increased in MW-7 and XW-3 from the last quarter of monitoring from 920 ppb to 3,600 ppb and 990 ppb to 4,800 ppb respectively.

Please submit a subsurface investigation workplan within 30 days of the receipt of this letter to determine the lateral and vertical extent of the contamination on this site.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0# 511

Certified Mailer # P 143 589 378

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

August 19, 1998

~~Mr. Scott Hooton~~

BP Oil Company
Environmental Remediation Management
295 SW 41st Street
Renton, WA 98055-4931

Ms. Tina Berry
Tosco
2000 Crow Canyon Place, Suite 400
San Ramon, CA 94583
STID 1771

RE: Former BP Oil Site # 11270, 3255 McCartney Road, Alameda, CA

Dear Ms. Berry and Mr. Hooton:

I have reviewed the Groundwater Monitoring and Sampling Report dated July 16, 1998 that was prepared by Alisto Engineering Group. Groundwater samples from monitoring wells, MW-6, MW-7 and XW-3 continues to have very high concentrations of MTBE. The concentrations of MTBE increased in MW-7 and XW-3 from the last quarter of monitoring from 920 ppb to 3,600 ppb and 990 ppb to 4,800 ppb respectively.

Please submit a subsurface investigation workplan within 30 days of the receipt of this letter to determine the lateral and vertical extent of the contamination on this site.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Files

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

R0#511

ENVIRONMENTAL HEALTH SERVICES

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

May 4, 1998

Mr. Scott Hooton
BP Oil Company
Environmental Remediation Management
295 SW 41st St.
Renton, WA 98055-4931
STID 1771

Ms. Tina Berry
Environmental Compliance
2000 Crow Canyon Place
Suite 400
San Ramon, CA 94583

RE: Former BP Oil, Site #11270, 3255 McCartney Road, Alameda, CA

Dear Mr. Hooton and Ms. Berry:

I have reviewed the Groundwater Monitoring and Sampling Report dated March 12, 1998 for the above site that was prepared by Alisto Engineering Group. Water samples collected on January 27, 1998 from MW-6 and MW-7 contained MTBE at concentrations of 38,000 ppb and 920 ppb respectively. (These concentrations are the highest concentrations detected in each well). MTBE, unlike other hydrocarbons in gasoline, is very water soluble. Thus, it moves with the groundwater flow, largely unretarded and resist biodegradation. Monitoring wells MW-6, MW-7 and XW-3 must be sampled on a quarterly basis and tested for the presence of TPH-G, BTEX and MTBE.

Please be aware that the San Francisco Bay Region, Regional Water Quality Control Board will have a policy concerning MTBE in the very near future. A groundwater investigation to determine the lateral and vertical extent of contamination relating to MTBE maybe required for the above site.

Please submit copies of annual precision test for the underground tanks at the above site for 1996 and 1997.

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Rob Weston, Environmental Health
Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0# 511

January 16, 1998

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

STID 1771

RE: 3255 McCartney Road (at Island Dr.), Alameda, CA 94501

Dear Mr. Hooton:

I have reviewed your Groundwater Monitoring and Sampling Report dated November 4, 1997 that was prepared by Alisto Engineering. The monitoring schedule at the site can be modified using the following schedule:

MW -5 - Okay to discontinue monitoring

MW - 6 - Continue monitoring for a minimum of two additional quarters (MTBE)
increased in 9/97 to 1400 ppb from 150 ppb in 1/96

MW -7 - Continue monitoring for a minimum of one additional quarter

XW - 1 - Okay to discontinue monitoring

XW - 2 - Okay to discontinue monitoring

XW -3 - Continue monitoring for a minimum of one additional quarter

If you have any questions, please contact me at (510) 567-6774.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

Cc: Files

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0#511

June 9, 1997

Mr. Scott Hooton
BP Oil Company
Environmental Resources Management
Building 13, Suite N
295 SW41st 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)

STD 1771

Re: MTBE concerns at BP Oil Site No. 11270, located at 3255 McCartney Road, Alameda, CA

Dear Mr. Hooton,

In the process of reviewing this site for closure, this office noted that groundwater samples collected from the site during the last two monitoring events, October 12, 1995 and January 8, 1996, were analyzed for Methyl Tertiary Butyl Ether (MTBE), and that MTBE was identified in MW-6 and XW-3 at concentrations exceeding the currently proposed threshold values for drinking water. Due to the fact that concentrations of MTBE increased in Well XW-3 from 480ppb in October 1995 to 1100ppb in January 1996, and the insufficient data we currently have on human health protective threshold values for this constituent, this office is requesting one additional round of groundwater samples be collected from all the monitoring wells associated with the site and analyzed for MTBE. If the analysis results indicate that the MTBE concentrations are stable or decreasing, this office will resume our review for case closure. However, if concentrations appear to be increasing, or we observe significant migration of the plume, further assessments may be warranted to assure that there are no potential receptors or on-going releases.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,


Juliet Shin

Senior Hazardous Materials Specialist

cc: Kevin Graves, RWQCB

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0#511

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

June 2, 1997

Mr. Scott Hooton
BP Oil Company
Environmental Resources Management
Building 13, Suite N
295 SW 41st Street
Renton, Washington 98055-4931

STID 1771

Re: Risk Assessment and closure for BP Oil Site No. 11270, located at 3255 McCartney Road, Alameda, California

Dear Mr. Hooton,

This office has reviewed Foster Wheeler Environmental Corporation's "Tier 2 RBCA Evaluation", dated November 1, 1996, for the above site. This risk assessment evaluation is acceptable to this office. Based on the conclusion that residual soil contaminant concentrations are not posing a threat to current site use, and that groundwater contaminant concentrations lie below the 10^{-5} excess cancer risk threshold for a residence in the Tier 1 table of ASTM's "Standard Guide for Risk-Based Corrective Action Applied at Petroleum Release Sites (E1739-95)", this office will assess the site for closure consideration.

Due to the fact that the above referenced risk assessment was not developed for potential construction worker scenarios or an indoor inhalation exposure pathway, further assessments of risk will be required in the future if a building is built on top of the contaminated soil or if construction work is conducted down to 4.5 feet below ground surface.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin

Senior Hazardous Materials Specialist

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0511

RAFAT A. SHAHID, Assistant Agency Director

June 12, 1995

Mr. Scott Hooton
BP Oil Company
Environmental Resources Mgmt.
Building 13, Suite N
295 SW 41st St.
Renton, Washington 98055-4931

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

STID 1771

Re: Investigations at BP Oil Site No. 11270, located at 3255
McCartney Road, Alameda, California

Dear Mr. Hooton,

This office has reviewed the March 22, 1995 Subsurface Investigation Report and the May 9, 1995 Groundwater Monitoring Report for the above site. In response to your question in the May 8, 1995 cover letter, high TDS levels do not imply that no corrective action is required at a site. Per Resolution No. 88-63 of the State Water Resources Control Board, TDS levels exceeding 3,000 mg/L only implies that the water should not be used for municipal or domestic purposes. Contaminated sites with TDS levels exceeding 3,000 mg/L could still have adverse impacts to aquatic life or even humans, depending on the ability for those contaminants to migrate or vaporize.

Quarterly ground water monitoring and water level measurements shall continue at the site.

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

cc: Acting Chief

File

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0511

RAFAT A. SHAHID, Assistant Agency Director

November 4, 1994

Mr. Scott Hooton
BP Oil Company
Building 13, Ste N
295 SW 41st St.
Renton, WA 98055-4931

ALAMEDA COUNTY CC4580
DEPT. OF ENVIRONMENTAL HEALTH
ENVIRONMENTAL PROTECTION DIVISION
1131 HARBOR BAY PKWY., #250
ALAMEDA CA 94502-6577

STID 1771

Re: Required investigations at BP Oil Facility (BP) #11270,
located at 3255 McCartney Road, Alameda, California

NOTICE OF VIOLATION

Dear Mr. Hooton,

This office sent you a letter on July 21, 1994 requiring that well construction information for the pre-existing Mobil-installed wells (MW-1 through MW-4) and the three neighboring wells (XW-1 through XW-3) be submitted to this office by September 1, 1994 (Refer to attached copy of July 21, 1994 letter). If this information could not be provided, this office required the installation of additional wells to confirm that the ground water samples and water level measurements collected from these wells were an accurate reflection of ground water conditions. To this date, this office has not received any well construction information or proposals for the installation of additional wells.

This office also requested, in the July 21, 1994 letter, that BP submit a report documenting the installation of Well MW-5 by August 18, 1994. To this date, this report has not been submitted to this office.

You are required to submit the above information to this office **within 30 days** of the date of this letter. As stated in previous correspondence, if well construction data cannot be generated on the existing on-site and off-site wells, a work plan will be required addressing the installation of additional/replacement wells for monitoring and gradient determinations.

If you have any questions or comments, please contact me at (510) 567-6700.

Sincerely,

Juliet Shin
Senior Hazardous Materials Specialist

Mr. Scott Hooton
Re: 3255 McCartney Road
November 4, 1994
Page 2 of 2

ATTACHMENT

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

Edgar Howell

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0511

RAFAT A. SHAHID, Assistant Agency Director

July 21, 1994

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

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

STID 1771

Re: Required investigations at BP Oil Facility (BP) #11270,
located at 3255 McCartney Road, Alameda, California

Dear Mr. Hooton,

Per Hydro-Environmental Technologies' (Hydro) Preliminary Site Assessment Report, dated January 7, 1993, for the above site, ground water samples collected from pre-existing Mobil-installed monitoring wells in October 1992 identified free product sheen and up to 2,600 ppb TPHg, 3,900 ppb TPHd, and 250ppb benzene. Consequently, this office required the submittal of a work plan addressing the delineation of the observed contamination, and well construction information for all the sampled monitoring wells, including the wells on the neighboring property, to assure that these wells are adequately constructed and screened for use in the site's ground water investigations.

Hydro submitted a work plan in April 1993 addressing the installation of one additional monitoring well for purposes of delineating the ground water contaminant plume. On May 7, 1993, this office sent a letter approving this work plan on the condition that BP obtain information on the construction of the existing on-site wells, and the neighboring off-site wells, to confirm that the ground water samples and water level measurements collected from these wells are an accurate reflection of actual ground water conditions.

To this date, this office has not received any information on the construction of the site's wells. As outlined in the County's May 7, 1993 letter, if well construction information cannot be obtained, replacement monitoring wells will have to be installed. You are required to submit the information on the construction of the on and off-site wells or submit a work plan addressing the installation of replacement wells **within 45 days** of the date of this letter.

Mr. Scott Hooton
Re: 3255 McCartney Rd
July 21, 1994
Page 2 of 2

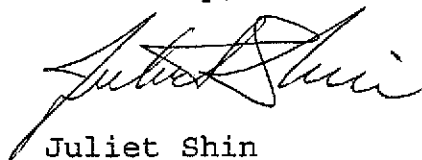
Per Article 5 Title 23 California Code of Regulations and the Regional Water Quality Control Board's guidelines, you are required to conduct quarterly ground water monitoring and reporting until the site qualifies for case closure. Prior to the most recent ground water sampling event in April 1994, the last ground water sampling event was conducted out at the site in June 1993. Therefore, BP was delinquent in conducting the required quarterly sampling by over three quarters. Please be reminded that the next quarterly ground water monitoring report is due in August/September 1994.

It was noted in the recent June 1993 Ground water Monitoring Report that the well proposed in the April 1993 work plan has been installed at the site. However, this office has no report documenting the installation and sampling of this well. Please submit a copy of this report **within 30 days** of the date of this letter.

Lastly, the June 1994 ground water sampling report was mistakenly directed to the incorrect Hazardous Materials Specialist, Brian Oliva. Please be reminded to direct any reports or correspondence regarding this site to Juliet Shin.

If you have any questions or comments, please contact me at (510) 337-2874 or (510) 337-2864.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

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

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

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0511

RAFAT A. SHAHID, Assistant Agency Director

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

October 4, 1993

Mr. Simon Kim
Harbor Bay BP Oil
3255 Mecartney Road
Alameda, CA 94501

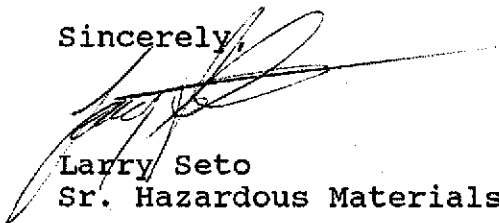
RE: 3255 Mecartney Road, Alameda, CA

Dear Mr. Kim:

On October 1, 1993, I performed an underground tank inspection at the above site with Chris Jonas and Don Atkinson-Adams from my office. At that time, you indicated to us a precision test was recently performed on your underground tanks. Please submit to our office a copy of your test results when they become available. Once we verify your underground tanks and pipelines are tight, we will issue you a new Five-Year Permit.

If you have any questions, please contact me at 271-4320.

Sincerely,



Larry Seto
Sr. Hazardous Materials Specialist

cc: Ed Howell, Chief, Hazardous Materials
Chris Jonas, Environmental Health
Don Atkinson-Adams, Environmental Health

GREEN COPY

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0511

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 7, 1993

Ms. Pauline Reith
BP Oil Company
16400 Southcenter Pkwy., Ste 301
Tukwila, Washington 98188

STID 1771

Re: BP Oil #11270, located at 3255 McCartney Road, Alameda

Dear Ms. Reith,

This office has received your letter, dated May 4, 1993, and Hydro-Environmental Technologies' work plan, dated April 28, 1993, addressing the installation of one additional monitoring well. The installation of this monitoring well is acceptable to this office with the following requirements/reminders:

- o This well must be screened adequately above and below the water table to account for fluctuations in the water table.
- o This well must be properly developed, with a minimum of 72 hours waiting period prior to sampling the well.
- o The soil and ground water samples collected must be analyzed for the appropriate constituents, using the appropriate methods, pursuant to the RWQCB's guidelines.
- o This well must be surveyed to an established benchmark with an accuracy of 0.01 foot.

Additionally, according to your letter of May 1993, no information is available on the construction of the existing wells on site. It is unclear whether the construction of these wells is adequate for current monitoring purposes at the site. Consequently, this office is reluctant to have these wells used as part of the monitoring requirements out at the site, and is requesting that you eventually install additional wells in place of these wells.

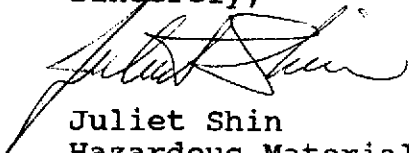
Lastly, if the construction details of the Harbor Bay Landing property are located and these wells are found to be adequate to be used for monitoring purposes, it is suggested that you collect samples from Well XW-3 in an attempt to determine the extent of the ground water contamination being identified in Well MW-4. If the Harbor Bay wells are determined to be inadequate for monitoring purposes, then you will be required to install

Ms. Pauline Reith
Re: 3255 McCartney Road
May 7, 1993
Page 2 of 2

additional wells at a later date to delineate the extent of the ground water contaminant plume at the site.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiett, RWQCB

Markus B. Niebanch, R.G.
Hydro-Environmental Technologies, Inc.
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



R0511

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

April 7, 1993

Scott Hooton
BP Oil Company
Environmental Resource Mgmt.
16400 Southcenter Pkwy., Ste 301
Tukwila, WA 98188

STID 1771

Re: BP Oil Facility #11270, located at 3255 McCartney Road,
Alameda, California

Dear Mr. Hooton,

This office has recently received a completed Underground Storage Tank Unauthorized Release (Leak) Contamination Site Report form, and HydroEnvironmental Technology's Preliminary Site Assessment Report (PSA), dated January 7, 1993, for the above site. According to the PSA results, elevated levels of Total Petroleum Hydrocarbons (TPH) as gasoline, TPH as diesel, and Benzene, Toluene, Xylenes, and Ethylbenzene (BTEX) were identified from the ground water samples collected from Wells MW-2 and MW-4, the only two wells sampled. Additionally, a free product sheen was observed on the purge water from the monitoring wells.

Per Section 2725, Article 11, Title 23 California Code of Regulations (CCR), you are required to conduct further investigations at the site to determine the nature and vertical and lateral extent of both soil and ground water contamination at the site. A work plan addressing this phase of work shall be submitted to this office within 60 days of the date of this letter. Please be advised that this is a formal request for a work plan pursuant to Section 2722 (c)(d) of Title 23 CCR.

Quarterly monitoring and reporting shall also continue at the site, per Section 2652, Article 5, Title 23 CCR. All ground water samples collected shall be analyzed for TPH as gasoline (TPHg) and BTEX, using the appropriate detection limits (50 ppb for TPHg and 0.5 ppb for BTEX). In the former ground water sample analysis, 1000 ppb and 10 ppb were used as the detection limits for TPHg and BTEX, which is unacceptable to RWQCB. Ground water samples collected from Well MW-2, located nearest to the waste oil underground storage tank (UST), shall also be analyzed for Total Oil and Grease, TPH as diesel, metals (Cd, Cr, Pb, Zn, and Ni), and PCB, PCP, PNA, and creosote using Method 8270.

Additionally, this office has no information on the history of the site. Please submit any additional information you may have on the site, including locations of any possible former USTs and

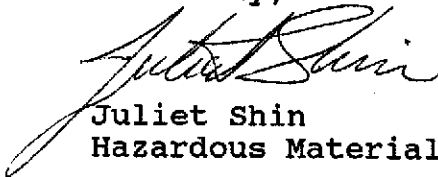
Scott Hooton
Re: 3255 McCartney Rd.
April 7, 1993
Page 2 of 2

pump islands and their uses, well logs for the four existing wells on site, and details of any former investigations at the site (e.g., information on the installation of the existing wells and why they were installed, etc.).

Lastly, it is unclear to this office whether the recently installed Harbor Bay Landing monitoring wells in the vicinity of the site are being used to determine the ground water gradient at the site. If this is so, than please submit the well logs for these wells to this office.

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

Sincerely,



Juliet Shin
Hazardous Materials Specialist

cc: Richard Hiatt, RWQCB

Mr. Markus Niebanck
Hydro Environmental Tech., Inc.
2363 Mariner Square Drive, Ste 243
Alameda, CA 94501

Edgar Howell-File(JS)

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0511

RAFAT A. SHAHID, Assistant Agency Director

September 17, 1992

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

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

RE: Permit cover letters for three British Petroleum Oil
facilities, located at, 1541 Park St., Alameda;
3255 McCartney Road, Alameda and 1617 Webster St., Alameda.

Dear Mr. Bennett:

Enclosed are three new permit cover letters to replace those
which incorrectly addressed British Petroleum Stations under the
Exxon Corporation. Please substitute the new cover letters for
the ones received earlier. Our file has already been corrected.
I regret any inconvenience which may have resulted from this
error.

If you have questions or additional concerns regarding the
permits, call me at (510) 271-4320.

Sincerely,


Kevin Tinsley
Hazardous Materials Specialist

cc; Brian Oliva, Hazardous Materials Specialist, Alameda County
Hazardous Materials Division

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



RAFAT A. SHAHID, Assistant Agency Director

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

April 22, 1992

Chester Bennett
Tait & Associates
2880 Sunrise Blvd., Suite 206
Rancho Cordova, CA 95742

Subject: BP Oil Co. Sites in Alameda County

Dear Mr. Bennett:

Enclosed you will find copies of the Alameda County, Department of Environmental Health, "Inspection Form" for the following sites:

(R054) 1)	BP Oil #11270, 3255 McCartney, Alameda, CA
(R056) 2)	BP Oil #11128, 4707 First Street, Livermore, CA
(R0403) 3)	BP Oil #11133, 2220 98th Ave., Oakland, CA
(R0346) 4)	BP Oil #11105, 3519 Castro Valley Blvd, Castro Valley, CA

Please feel free to contact this office if you have any questions concerning the above sites or any other BP Oil facilities under the authority of the Alameda County Division of Hazardous Materials. The telephone number is (510) 271-4320

Sincerely,

Brian P. Oliva, REHS
Hazardous Materials Specialist

cc: Mark Thomson, Alameda County DA's Office
Pete DeSantis, BP Oil Co.

TFP

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



R0511

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

September 13, 1991

Mr. Simon Kim
B P Oil Company
3255 McCartney Road
Alameda, CA 94501

SECOND NOTICE OF VIOLATION

**SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company Facility #11270, 3255 McCartney Road,
Alameda, California 94501**

Dear Mr. Kim:

On July 18, 1991, Maria Mendoza from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

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

- 1) Section 2641 and 2644, Title 23, CCR and Section 25292.4) of H&SC - Per Section 2641, CCR, all owners of existing underground storage tanks are to select an appropriate monitoring alternative. If monitoring alternative #5 is selected, the following activities are required: daily inventory reconciliation, annual tank testing and continuous pipeline leak detection.
 - a) Inventory records are currently not maintained properly. Monitoring alternative in Section 2641 which specifies inventory reconciliation shall take into account: separate daily underground storage tank quantity measurements for both the stored hazardous substance and any water layer, and daily meter readings for underground storage tank input and withdrawal.

3255 Mecartney, Alameda
September 13, 1991
Page 2 of 3

Begin performing daily inventory reconciliation and keep records starting from the date of inspection (July 18, 1991). Compare inputs and metered throughputs to a stick reading and keep track of variations.

Submit copies of monthly inventory reconciliation records to our office for the month of July and August only (by September 27, 1991), then for the month of September only within 10 days of completion (by October 10, 1991).

- b) Quarterly summary reports have not been submitted to our office. The owner or operator, per Section 2644(e), CCR, shall on a quarterly basis, submit a summary report to the local agency, under penalty of perjury, that either: the data is within allowable variations or a listing of the dates and variations that exceed the allowable variations.

Submit quarterly summary report for the months of July and August only (by September 27, 1991), then for the month of September only (by October 10, 1991). You may use the quarterly summary report provided to you during the inspection.

- 2) Section 2643, CCR and Section 25292 of H&SC - This office has no information regarding installation of an automatic line leak detection system nor copies of the annual tightness test for pressurized piping. Per the above sections, the underground storage tank owner is required to install an automatic line leak detector and have the underground pressurized piping tightness tested annually. Additionally, the last integrity tests on the product tanks is dated July 2, 1990. Please provide our office with the results of tank tightness tests and pipeline leak detection tests. Also, provide us with a time schedule regarding the installation of an automatic line leak detector at the subject facility.
- 3) For the waste oil tank which was installed in 1982, you may utilize monitoring alternative #7, per Section 2641(c)(7), which includes the following activities: weekly tank gauging and annual tank testing. Currently, monitoring for waste oil (tank gauging and annual tank testing) was not being done by the operator. Records of

3255 Necartney, Alameda
September 13, 1991
Page 3 of 3

annual waste oil tank integrity test have not been received by our office.

Start performing weekly tank gauging and record tank waste oil level measurements. If the liquid level varies by more than 1% of the tank's volume or 5 gallons, whichever is less between measurements, an unauthorized release shall assumed to have occurred and shall be the cause for further investigation. Also, please submit annual tank test results to this office.

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 working days, i.e. no later than September 27, 1991 and other documents within the time frame specified. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

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

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

Sincerely,



Thomas Peacock
Sr. Hazardous Materials Spec.

MAM:man

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

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0511

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

July 25, 1991

Mr. Simon Kim
B P Oil Company
3255 McCartney Road
Alameda, CA 94501

NOTICE OF VIOLATION

SUBJ: Five-Year Permit to Operate Four Underground Storage Tanks
at BP Oil Company Facility #11270, 3255 McCartney Road,
Alameda, California 94501

Dear Mr. Kim:

On July 18, 1991, Maria Mendoza from our office inspected the above premises. The inspection was performed to evaluate whether the conditions for the 5-year underground storage permit were being met prior to its issuance.

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

- 1) Section 2641 and 2644, Title 23, CCR and Section 25292(4) of H&SC - Per Section 2641, CCR, all owners of existing underground storage tanks are to select an appropriate monitoring alternative. If monitoring alternative #5 is selected, the following activities are required: daily inventory reconciliation, annual tank testing and continuous pipeline leak detection.
 - a) Inventory records are currently not maintained properly. Monitoring alternative in Section 2641 which specifies inventory reconciliation shall take into account: separate daily underground storage tank quantity measurements for both the stored hazardous substance and any water layer, and daily meter readings for underground storage tank input and withdrawal.

3255 McCartney Rd., Alameda
July 25, 1991
Page 2 of 3

Begin performing daily inventory reconciliation and keep records starting from the date of inspection (July 18, 1991). Compare inputs and metered throughputs to a stick reading and keep track of variations. Submit copies of monthly inventory reconciliation records to our office within 10 days of completion until further notice.

- b) Quarterly summary reports have not been submitted to our office. The owner or operator, per Section 2644(e), CCR, shall on a quarterly basis, submit a summary report to the local agency, under penalty of perjury, that either: the data is within allowable variations or a listing of the dates and variations that exceed the allowable variations. Submit quarterly summary report to our office. Please find enclosed a sample of a quarterly summary report for your reference.
- 2) Section 2643, CCR and Section 25292 of H&SC - This office has no information regarding installation of an automatic line leak detection system nor copies of the annual tightness test for pressurized piping. Per the above sections, the underground storage tank owner is **required to install an automatic line leak detector** and have the underground pressurized piping tightness tested annually. Additionally, the last integrity tests on the product tanks is dated July 2, 1990. Please provide our office with the results of tank tightness tests and pipeline leak detection tests. Also, **provide us with a time schedule regarding the installation of an automatic line leak detector at the subject facility.**
- 3) For the waste oil tank which was installed in 1982, you may utilize monitoring alternative #7, per Section 2641(c)(7), which includes the following activities: weekly tank gauging and annual tank testing. Currently, monitoring for waste oil (tank gauging and annual tank testing) was not being done by the operator. Records of annual waste oil tank integrity test have not been received by our office.

Start performing weekly tank gauging and record tank waste oil level measurements. If the liquid level varies by more than 1% of the tank's volume or 5 gallons, whichever is less between measurements, an unauthorized release shall assumed to have occurred and shall be the cause for further investigation. Also, please submit annual tank test results to this office.

3255 McCartney Rd., Alameda
July 25, 1991
Page 3 of 3

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 working days, i.e. no later than August 8, 1991**. A follow-up inspection will be conducted upon receipt and review of the required documents, and a five-year operating permit will be issued when the above requirements are met.

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

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

Sincerely,



for Thomas Peacock, Sr. HazMat Specialist
Hazardous Materials Division

MAM:mam

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

enclosure

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0511

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

Certified Mailer #: P 062 127 806

June 1, 1990

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

Re: **Soil Contamination at B. P. Station at 3255 McCartney Road,
Alameda, California**

Dear Mr. Parisi:

Soil contamination was discovered at 3255 McCartney Road during the excavation of existing underground storage tank piping and dispensers. This contamination, caused by gasoline leaks or tank over fills, must be cleaned up. We wish to inform you that all soil contaminated with greater than 1,000 parts per million (ppm) total petroleum hydrocarbons (TPH) must be excavated or remediated. We strongly urge you to clean up the soil to levels below 100 ppm TPH - and even down to non-detectable levels - for the following reasons:

The Regional Water Quality Control Board (RWQCB) requires extensive and long term ground water monitoring of sites where soil is not excavated or remediated below 100 ppm TPH;

The RWQCB requires well-documented, strong justifications for not excavating or remediating soil to contaminant levels below 100 ppm TPH;

It is the RWQCB's preference that contamination be cleaned up to non-detectable levels; and

The sites whose contaminated soil is excavated or remediated to low or non-detectable levels more quickly meet case closure requirements than those sites which are not cleaned up in this fashion.

We also recommend that the contaminated soil be cleaned up by excavation - the most direct clean up method - and that excavation be done at the present time while the station is closed for underground tank modifications and while excavation for piping replacement is already in progress. The full vertical and lateral extent of the existing soil contamination must be determined. We will not permit new tank piping to be installed before clean up is addressed.

Page 2 of 2
Mr. Lou Parisi
3255 McCartney Road
June 1, 1990

Should you have any questions, please contact me at 415/271-4320.

Sincerely,



Katherine A. Chesick,
Senior Hazardous Materials Specialist

cc: W. J. Hollis, Environmental Coordinator, B. P. Oil Company
Hagop Kevork, Kaprealian Engineering, Inc.
Tony Miller, Paradiso Construction
Lester Feldman, Regional Water Quality Control Board
Steve McKinley, Alameda Fire Department
Howard Hatayama, State Department of Health Services
Gil Jensen, Alameda County District Attorney, Consumer and
Environmental Protection Division
Rafat A. Shahid, Alameda County Environmental Health Department
Files