

From: Roe, Dilan, Env. Health
To: "[Kathleen Waldo](#)"
Cc: "shannon.couch@bp.com"
Subject: FW: Case Evaluation & Justification for No Further Action, RO0000281, RO0000076, RO0000100
Date: Thursday, June 28, 2012 7:41:00 PM

Kate:

Could you please send me electronic files of the historic groundwater monitoring data for the three ARCO sites (RO0000078, RO0000100, and RO0000281) to help facilitate my review of the requests for closures submitted to Alameda County Environmental Health by Closure Solutions. If you have them in Xcel format that would be ideal.

Regards,

Dilan Roe, P.E.

Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510.567.6767; Ext. 36767
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PDF copies of case files can be reviewed/downloaded at:

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

From: Roe, Dilan, Env. Health
Sent: Friday, June 22, 2012 5:08 PM
To: 'Kathleen Waldo'
Cc: 'shannon.couch@bp.com'
Subject: Case Evaluation & Justification for No Further Action, RO0000281, RO0000076, RO0000100

Kate:

I wanted to give you a status update on my review of the Case Evaluation & Justification for No Further Action reports submitted by Closure Solutions, Inc. on behalf of Atlantic Richfield Company. As I discussed in our telephone conversation on May 25, 2011, while I have been reviewing the case files for the three subject sites, I have focused mainly on the Former BP Station No. 11104 (RO_0000281) due to the discovery of free product in recovery well RW-1 located adjacent to the underground storage tank pit in during the Third Quarter 2011 and 1st Quarter 2012 groundwater monitoring events. Although our review of the case is not complete, Alameda Environmental Health (ACEH) has concerns regarding the data, assumptions, and recommendations presented in the following reports:

- Case Evaluation & Justification for No Further Action (January 21, 2011, Closure Solutions, Inc.)

- Third Quarter 2011 Monitoring Report (October 6, 2011, Broadbent & Associates, Inc.)
- Supplemental Information on SPH Fingerprint Analysis (December 12, 2011, Closure Solutions, Inc.)
- First Quarter 2012 Monitoring Report (March 30, 2012, Broadbent & Associates, Inc.)

In August 2011, BAI reportedly collected a sample of the free product in recovery well RW-1 and one sample each from the low, mid, and high octane unleaded gasoline dispensers. The four samples were submitted to Torkelson Geochemistry, Inc. to be analyzed by capillary gas chromatography analysis. Based on the results of the hydrocarbon fingerprint analysis, Torkelson concluded that the chromatogram of the free product in well RW-1 has some of the characteristics of a middle distillate either diesel fuel or fuel oil, and states that although the RW-1 chromatogram is not typical of diesel or fuel oil chromatograms he has seen, it does not rule out the possibility that RW-1 is some unique formulation of diesel fuel or fuel oil.

Based on these results, both Broadbent and Closure Solutions conclude that the free product in well RW-1 cannot be identified and does not appear to be a fuel product from site operations. However, based on a discussion with ACEH CUPA, subsequent to ConocoPhillips sale of the station to United Brothers Enterprise, Inc. (UBE) in 2009, the 6,000 gallon gasoline tank was replaced with a 6,000 gallon steel diesel tank in the same year. ACEH is concerned that in light of the discovery of free product in the well and the existence of a diesel tank at the site, that neither Broadbent nor Closure Solutions has made recommendations for interim corrective actions and that Closure Solutions contends that the site is still a candidate for low-risk closure. I will be submitting a formal directive letter requesting further site investigation, however advise Atlantic Richfield Company to be proactive in this matter.

In order to help expedite and facilitate review of the three cases and move them towards case closure consideration, please ensure that the ACEH ftp site and the State Water Resource Control Board GeoTracker website contain a complete and accurate electronic database including:

- complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO_REPORT files);
- analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation (EDF files);
- surveyed elevation measurements to the top of well casings (GEO_Z files);
- the latitude and longitude (GEO_XY files) of any permanent monitoring well for which data is reported in EDF format;
- depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event (GEO_WELL files);
- stand alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO_MAP files);
- stand alone boring logs with depth to the screened interval and the length of screened interval for any permanent monitoring well installed (GEO_BORE files);

Please do not hesitate to contact me should you have any questions or concerns regarding this e-mail correspondence .

Regards,

Dilan Roe, P.E.

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