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Alameda County
Environmental Health

3 June 2009

Project No. 06-88-615

Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502
Submitted via ACEH ftp Site

Attn.: Mr. Paresh Khatri

Re: Ground-Water Monitoring and Remediation System Summary Report Deadlines
Atlantic Richfield Company Station No.2111 1156 Davis Street, San Leandro, California;
ACEH Case #RO0000494

Dear Mr. Khatri:

On behalf of Atlantic Richfield Company (a BP affiliated company), Broadbent & Associates, Inc. (BAI) has prepared this letter to address recent changes in the deadline for submittal of ground-water monitoring and remediation system summary reports for Atlantic Richfield Company Station No.2111 (herein referred to as Station No.2111) located at 1156 Davis Street, Oakland, California. Ground-water monitoring and remediation system summary reporting is currently completed on a quarterly basis at Station No.2111.

The previous deadline for submittal of quarterly ground-water monitoring and remediation system summary reports at Station No.2111 was within 30 days following the close of the calendar quarter. Your recent Alameda County Environmental Health (ACEH) letter dated 24 April 2009 authorized reduction of ground-water monitoring/sampling from quarterly to semi-annually (specifically first and third calendar quarters), but continuing with quarterly submittal of remediation system summary reports. Be they either remediation system summary reports or combined semi-annual ground-water monitoring with remediation system summary reports, your 24 April 2009 letter went on to request that these reports be submitted within 30 days of sampling at Station No.2111. It is our understanding that the ACEH has implemented this change in an effort to spread out report submittals received.

As you are aware, Atlantic Richfield Company currently has two suppliers working on the environmental case at Station No.2111. Stratus Environmental, Inc. (Stratus) completes the field work and BAI generates the final reports for submittal to the ACEH. Typically, Stratus receives a laboratory analytical report two weeks following completion of a quarterly or semi-annual ground-water monitoring/sampling event. Stratus then generates a certified data package that includes field data sheets, non-hazardous waste transportation bill of lading, completed chain-of-custody documentation, laboratory analytical results, and field procedures for ground-water monitoring/ sampling, which BAI typically receives one month following completion of the sampling event. Similarly, Stratus receives laboratory analytical reports two weeks following completion of the monthly remediation system monitoring/sampling events (usually at least two per month). Stratus then generates a certified monthly operation and maintenance (O&M) data package that includes field data sheets and laboratory analytical reports, which BAI typically

receives three weeks following the last remediation system monitoring/sampling event of the month. Three monthly O&M data packages are accumulated for the calendar quarter's report.

As detailed above, the timing of when BAI receives the necessary information to facilitate generation of the requested reports makes it generally not feasible to meet the stipulated deadline of within 30 days following the sampling date. Furthermore, these reports serve to summarize all environmental work completed at Station No.2111 through the end of the given quarter. Therefore, submittal of a report before the close of the quarter is not logical. BAI currently generates approximately 50 reports for Atlantic Richfield Company and former BP stations in Alameda County each quarter. Report deadlines based on a specific number of days since sampling is not cost effective as reports are generated, reviewed, and processed in batch format. As you are aware, BAI is currently working with you on a mutually-agreeable deadline for submittal of monitoring reports in accordance with the California Code of Regulations Title 23 Section 2727. However, for Station No.2111 in particular, it is proposed that quarterly remediation system summary reports and combined semi-annual ground-water monitoring reports/quarterly remediation system summary reports still be due within 30 days following the end of each calendar quarter.

It is respectfully requested that the ACEH provide a response to this letter and our request for revision of the submittal deadline for the quarterly remediation system summary reports and combined semi-annual ground-water monitoring reports/quarterly remediation system summary reports for Station No.2111. Should you have questions, please do not hesitate to contact us at (530) 566-1400.

Sincerely,

BROADBENT & ASSOCIATES, INC.



Thomas A. Venus, P.E.
Senior Engineer

cc: Mr. Paul Supple, Atlantic Richfield Company (Submitted via ENFOS)
Mr. Karl Busche, City of San Leandro Environmental Services Division (Electronic copy uploaded to GeoTracker)