

From: Roe, Dilan, Env. Health
To: "[Couch, Shannon L. \(URS\)](#)"
Cc: [Skance, John](#); [Drogos, Donna, Env. Health](#)
Subject: RE: BP-ACEH Meeting Summary - March 28, 2013, ARCO Station #601, RO0000309
Date: Monday, April 15, 2013 9:29:00 AM

Hi Shannon:

I have reviewed the document entitled "Conceptual Site Model and Case Closure Request" dated January 31, 2013 for the ARCO Station #601, Alameda County Environmental Health Case No. RO0000309. I would like to provide feedback on the format of the document as well as my findings. Please call to discuss when you get a chance.

Thanks,

Dilan Roe, P.E.

Supervising Hazardous Materials Specialist

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510.567.6767; Ext. 36767
QIC: 30440
dilan.roe@acgov.org

PDF copies of case files can be reviewed/downloaded at:

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

From: Couch, Shannon L. (URS) [mailto:Shannon.Couch@bp.com]
Sent: Friday, March 29, 2013 11:18 AM
To: Roe, Dilan, Env. Health; Drogos, Donna, Env. Health
Cc: Skance, John
Subject: BP-ACEH Meeting Summary - March 28, 2013

Hello Dilan and Donna,

Thank you for meeting with me and John Skance yesterday. We believe the meeting was productive, and we now feel we have some additional guidance and direction which we hope will allow our BP/ARCO projects to move forward more efficiently and effectively.

A number of important items were discussed during our meeting, and it's our understanding that the following key items were agreed-upon:

- 1) For ARCO 2111 (ACEHD RO0000494), prior to ACEH reviewing the revised work plan BP will complete ACEH's Data Gap Identification Tool (DGIT) and will email a draft to Dilan Roe for comment. Dilan- when you get an opportunity, will you please send me the latest electronic version of the DGIT?

- 2) In all future reports and work plans BP will more clearly articulate the basis (or foundation) regarding it's understanding of existing site conditions and any additional work that is being proposed to fill remaining data gaps, and will provide an adequate discussion of the Site data.
- 3) ACEH's SCM "tables" will be included as a separate Appendix to each work plan and report submitted. We will also attempt to improve the organization of our documents by including appropriate supporting items as separate appendices.
- 4) All site-related communications between the ACEH and BP shall be with Shannon Couch, the primary BP representative. The exception to this would be brief calls/communications with Suppliers as appropriate to confirm field work schedules, etc. All technical comments, decisions, approvals, or rejections shall be captured in directive letters/emails, or otherwise documented in writing, by the ACEH.
- 5) As appropriate, consider BP/ARCO's open/active LUFT sites for low risk UST Case Closure using all pathways for doing so, including (and in no particular order):
 - a. Low Threat Closure Policy (SWRCB Resolutions 2012-0016 and 2012-0062),
 - b. SWRCB Closure Precedent (stemming from Closure Denial Petitions, Fund 5 Year Reviews, etc.),
 - c. Other related SWRCB Policies and Resolutions (such as 1988-0063, 1992-0049, 2009-0042 and 2009-0081), and,
 - d. In the context of Site and local-area background conditions (including non-BP/ARCO anthropogenic sources and plumes, existing designated non-attainment zones, etc.) .

If I have left out anything material, or if you or Donna do not have the same understanding of the above, please let me know so we can ensure we are aligned on our path forward.

Thanks,
Shannon

Shannon Couch
Operations Project Manager
Remediation Management
Atlantic Richfield Company
O: 925.275.3804
C: 510.798.8314