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Alameda County  
Environmental Health



3 June 2009

Project No. 06-88-634

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

Attn.: Mr. Paresh Khatri

Re: Semi-Annual Ground-Water Monitoring Report Deadlines, Former Atlantic Richfield Company Station No.6002, 6235 Seminary Avenue, Oakland, California;  
ACEH Case #RO0000163

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 reports for former Atlantic Richfield Company Station No.6002 (herein referred to as Station No.6002) located at 6235 Seminary Avenue, Oakland, California. Ground-water monitoring is currently completed on a quarterly basis at Station No.6002.

The deadline for submittal of past quarterly ground-water monitoring reports at Station No.6002 was 30 days following the close of the calendar quarter. However, your recent Alameda County Environmental Health (ACEH) letter dated 22 May 2009 authorized reduction of ground-water monitoring/sampling from quarterly to semi-annually (specifically first and third quarters) and specified that the semi-annual ground-water monitoring reports must be submitted within 30 days of sampling at Station No.6002. 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.6002. Stratus Environmental, Inc. (Stratus) completes the field work and BAI generates the final reports for submittal to the ACEH. Typically, Stratus receives the laboratory report two weeks following completion of the 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.

As detailed above, the timing of when BAI receives the necessary information to facilitate generation of a monitoring report makes it not possible to meet the stipulated deadline of within 30 days following the sampling date. Furthermore, monitoring reports serve to summarize all environmental work completed at Station No.6002 through the end of the given quarter, or semi-annual period as the case may be. Therefore, submittal of a report before the close of the semi-annual period is not logical. BAI currently generates approximately 50 reports for Atlantic

Richfield Company and former BP stations in Alameda County each quarter. A report deadline based on a specific number of days since sampling is not cost effective as reports are generated, reviewed, and processed in batch format.

Understanding your objective to spread out report submittals received, it is alternatively proposed that a given calendar quarter be split into two halves. If Station No.6002 is sampled in the first half of the calendar quarter, the deadline for submittal of the report would be five business days following close of the quarter (e.g., for Third Quarter 2009 the report deadline would be no later than 7 October 2009). If Station No.6002 is sampled in the second half of the calendar quarter, the deadline for submittal of the report would be 30 days following close of the quarter (e.g., for Third Quarter 2009 the report deadline would be no later than 30 October 2009). The most recent sampling events for Station No.6002 were completed near the middle of the calendar quarter. Therefore, the deadline for submittal of future semi-annual monitoring/sampling reports would be either within five business days following the close of the calendar quarter or within 30 days following the close of the calendar quarter, depending upon the sampling dates. The deadline for submittal of future status reports for quarters not sampled (i.e., second and fourth quarters) would be within five business days following the close of the calendar quarter.

In addition to being a cost effective and achievable deadline for Atlantic Richfield Company, this revision will also spread out report submittals received by ACEH and serve to provide reports encompassing the entire quarter. It is respectfully requested that the ACEH provide a response to this letter and our request for revision on the deadline of submittal of quarterly ground-water monitoring reports for Station No.6002. 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)  
Electronic copy uploaded to GeoTracker