

## Jakub, Barbara, Env. Health

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**From:** Jakub, Barbara, Env. Health  
**Sent:** Friday, March 22, 2013 10:21 AM  
**To:** 'Thomas Neely'; jennifer.c.sedlachek@exxonmobil.com  
**Cc:** Douglas Oram; Christa Marting; Hamidou Barry; Deborah Hensley  
**Subject:** RE: RO2515, ExxonMobil 70234

Dear Ms. Sedlachek,

Your request for an extension is approved. However, please also submit a project plan for the site with the work plan. This baseline environmental project schedule should be prepared as described below.

1. **Baseline Environmental Project Schedule** – The State Water Resources Control Board passed Resolution No. 2012-0062 on November 6, 2012 which requires development of a Path to Closure Plan by December 31, 2013 that addresses the impediments to closure for the site. The Path to Closure must have milestone dates by calendar quarter which will achieve site cleanup and case closure in a timely and efficient manner that minimizes the cost of corrective action. The Project Schedule should include, but not be limited to, the following key environmental elements and milestones as appropriate:

- Preferential Pathway Study
- Soil, Groundwater, and Soil Vapor Investigations
- Initial, Updated, and Final/Validated SCMs
- Interim Remedial Actions
- Feasibility Study/Corrective Action Plan
- Pilot Tests
- Remedial Actions
- Soil Vapor and Groundwater Monitoring Well Installation and Monitoring
- Public Participation Program (Fact Sheet Preparation/Distribution/Public Comment Period, Community Meetings, etc.)
- Case Closure Tasks (Request for closure documents, ACEH Case Closure Summary Preparation and Review, Site Management Plan, Institutional Controls, Public Participation, Landowner Notification, Well Decommissioning, Waste Removal, and Reporting.)

Please include time for regulatory and RP in house review, permitting, off-site access agreements, and utility connections, etc.

Please use a critical path methodology/tool to construct a schedule with sufficient detail to support a realistic and achievable Path to Closure Schedule. The schedule is to include at a minimum:

- Defined work breakdown structure including summary tasks required to accomplish the project objectives and required deliverables
- Summary task decomposition into smaller more manageable components that can be scheduled, monitored, and controlled
- Sequencing of activities to identify and document relationships among the project activities using logical relationships
- Identification of critical paths, linkages, predecessor and successor activities, leads and lags, and key milestones

- Identification of entity responsible for executing work
- Estimated activity durations (60-day ACEH review times are based on calendar days)

Please submit an electronic copy of the Path to Closure Schedule with the work plan.. ACEH will review the schedule to ensure that all key elements are included.

Sincerely,  
Barb Jakub

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**From:** Thomas Neely [<mailto:tneely@eticeng.com>]  
**Sent:** Tuesday, March 19, 2013 4:26 PM  
**To:** Jakub, Barbara, Env. Health  
**Cc:** Douglas Oram; Christa Marting; [jennifer.c.sedlachek@exxonmobil.com](mailto:jennifer.c.sedlachek@exxonmobil.com); Hamidou Barry; Deborah Hensley  
**Subject:** RO2515, ExxonMobil 70234

Hi Barbara:

Thank you for taking the time to discuss this site with me last Friday. During our conversation, you confirmed that the current required submittal is a conceptual site model (CSM) with a work plan, superseding your previous directive for submittal of the DGIT and project plan. As noted below, you requested that the CSM and work plan be submitted by April 15, 2013.

We respectfully request that the deadline for the CSM be extended to Friday, May 10, 2013, and the deadline for the work plan to assess data gaps be extended to Friday, May 24, 2013.

Thank you for your consideration of this request.

Tom  
**Thomas Neely, PG, CHG, QSD**  
**Senior Project Manager**  
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**From:** Jakub, Barbara, Env. Health [<mailto:barbara.jakub@acgov.org>]  
**Sent:** Tuesday, March 05, 2013 4:04 PM  
**To:** [jennifer.c.sedlachek@exxonmobil.com](mailto:jennifer.c.sedlachek@exxonmobil.com)  
**Cc:** Thomas Neely; Douglas Oram  
**Subject:** RO2515, ExxonMobil 7-0234

Dear Ms. Sedlachek,

Please prepare a conceptual site model (CSM) for the site to comply with the Low-Threat Closure Policy. Prepare The CSM in accordance with the State Water Resources Control Board's Leaking Underground Fuel Tank Guidance Manual dated September 2012. Please identify any remaining data gaps and present a work plan to assess the data gaps that are identified.

Present your CSM with data gap work plan by April 15, 2013 (File to be named: SCM\_WP\_R\_yyyy-mm-dd).

Regards,

Barbara Jakub, P.G.  
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PDF copies of case files can be downloaded at:

<http://ehgis.acgov.org/dehpublic/dehpublic.jsp>