

From: Roe, Dilan, Env. Health
To: [Couch, Shannon L. \(URS\) \(Shannon.Couch@bp.com\)](mailto:Shannon.Couch@bp.com); "[Skance, John](#)"
Cc: "[Kristene Tidwell](#)"; "[Tom Venus](#)"; [Matt Herrick](#)
Subject: Fuel Leak Case No. RO0000307 (BP Station 402), Fuel Leak Case No. RO0002526 (BP Station 2107), Fuel Leak Case No. RO0000494 (BP Station 2111), Fuel Leak Case No. RO0000190 (BP Station 2162), Fuel Leak Case No. RO0000078 (BP Station 374)
Date: Thursday, February 21, 2013 5:32:00 PM
Attachments: [BP Workplans.docx](#)

Shannon and John:

Alameda County Environmental Health has reviewed the five work plans recently submitted by Broadbent & Associates, Inc. (BAI) for the subject sites (see attached file for details). ACEH has evaluated the data and recommendations presented in the work plans in conjunction with information contained in the case files and the State Water Resources Control Board's Low Threat Closure Policy (LTCP) criteria.

Due to the extensive nature of our comments on the work plans, I scheduled several lengthy teleconference calls with BAI staff last month on January 2, January 11, and January 28 to discuss the inadequacy of the proposed scopes of work. My concerns include but are not limited to the lack of site conceptual models for the site that justify the proposed scope of work, the failure to address data gaps that are critical to advancing your sites towards closure under the LTCP, a lack of understanding of the LTCP criteria, and the lack of inclusion of standard elements in the work plans that address goals and objectives, data quality objectives, and standard operating procedures/sampling and analysis plan.

Local Oversight Agencies are under mandate by the SWRCB to conduct evaluations of all sites using the LTCP, identify data gaps and impediments to closure, and work with responsible parties to develop a Path to Closure Plan by December 31, 2013. 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.

Therefore, I would like to schedule a meeting with you both as well as Matt Herrick, Kristine Tidwell, and Tom Venus to discuss our comments and a more efficient path forward. I would like to schedule a four hour meeting as my comments are extensive and the goal of this meeting is for everyone to come away with a thorough understanding of each of the sites and a plan to efficiently move them towards closure.

Please propose some times in the near future when your team could be available to meet, with the exception of next week.

Thank you,

Dilan Roe, P.E.

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

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

BP Station Number	Fuel Leak Case Number	Work Plan Title	Prepared By	Date Received	ACEH Response
Station 402	RO0000307	Revised Workplan for Monitoring Well Installation and Vapor Intrusion Assessment	Tom Venus, BAI	11/8/2012	Teleconference call and email correspondence with Tom Venus on 1/2/2013 to discuss ACEH comments on work plan including proposed locations of groundwater monitoring wells (plume delineation due to variable groundwater flow directions, proposed long screen intervals (purpose of monitoring – gravel aquifer, clay layers, water table fluctuations, etc.), collection of soil samples in the vadose zone only, and attempts to locate monitoring wells MW-1, MW-2, and MW-3.
Station 2107	RO0002526	Work Plan for Groundwater Investigation	Kristine Tidwell, BAI	11/08/2012	Teleconference call on 1/11/2013 to discuss ACEH's concerns with proposed off-site investigation without an updated SCM that discusses vertical gradients observed in nested monitoring wells.
Station 2111	RO0000494	Revised Soil & Groundwater Investigation Work Plan	Kristine Tidwell, BAI	11/08/2012	Teleconference call with Kristine Tidwell on 1/11/2013 and email correspondence on 1/14/2013 to discuss ACEH comments on work plan including soil boring locations, soil and groundwater sample collection and analysis methods, well survey evaluation, evaluation of monitoring well MW-8 and validation of data, confirmation sampling, and vapor intrusion to indoor air in adjacent off-site buildings.
Station 2162	RO0000190	Revised Work Plan for Off-Site Groundwater Investigation	Tom Venus, BAI	1/3/2013	ACEH review complete – work plan not supported by a SCM and data gaps not addressed.
Station 374	RO0000078	Soil Vapor Investigation WP	Kristine Tidwell, BAI	11/21/2012	Teleconference call on 1/28/2013 to discuss ACEH's comments on work plan including adequacy of proposed soil vapor investigation in light of shallow groundwater conditions, migration in utility corridors, and potential vapor intrusion in adjacent buildings.