

From: Roe, Dilan, Env. Health
To: [Ravi Nandwana \(Ravi@missionvalleyhomes.com\)](mailto:Ravi.Nandwana@missionvalleyhomes.com)
Cc: [Shawn Munger](#); ["Morgan Johnson"](#)
Bcc: [Drogos, Donna, Env. Health](#)
Subject: RO2918, Jordan Ranch
Date: Tuesday, September 25, 2012 4:03:00 PM

Dear Mr. Nandwana:

This email serves to document a telephone conversation held this afternoon with myself and Shawn Munger and Morgan Johnson with ENGEO regarding the Workplan for Groundwater Assessment dated September 21, 2012. As stated in our meeting on August 20, 2012, Alameda County Environmental Health (ACEH) is committed to working with you and your consultants to move the case towards closure in an efficient and cost effective manner. However, I am concerned about the quality of work that has been submitted to our office by ENGEO, and the lack of presentation of a site conceptual model that supports proposed work to characterize the site. As a courtesy to you, I have reviewed draft documents and met with your consultants to discuss my comments in order to expedite this process. Based on my conversation with Mr. Johnson and Mr. Munger this afternoon, I am concerned that this method is not effective, as I continue to get work plans that are not adequately supported. ACEH is concerned that the proposed scope of work for groundwater assessment will not provide sufficient delineation of the subsurface conditions and groundwater plume and may therefore result in delays to your project. I have asked ENGEO to resubmit the workplan with a site conceptual model in a table format similar to the example I provided previously that justifies the proposed work. In light of the rebound in MTBE and benzene concentrations in groundwater at your site after implementation of the approved Corrective Action Plan, and your proposed development schedule, ACEH recommends use of cone penetrometer testing to adequately delineate the vertical distribution of soil and groundwater impacts.

I was asked today by Mr. Munger what would happen if the proposed groundwater assessment and construction and operation of the groundwater extraction trench proceeds without ACEH approval and I stated that it would delay the case closure process. I have met with you and discussed my strategy for expediting site closure (i.e., through streamlined collection and analysis of data, and cooperative relationships between the responsible parties, consultants and regulatory agencies). This line of questioning by ENGEO is contrary to this approach and makes me think that perhaps I should revert to a more formal regulatory approach. I believe I have demonstrated my willingness to work with you on this project however need to know there is a good faith effort on your side as we move forward.

Please let me know how you would like to proceed.

Regards,

Dilan Roe, P.E.

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