

From: [Ravi Nandwana](#)
To: [Roe, Dilan, Env. Health](#)
Cc: [Shawn Munger](#); [Morgan Johnson](#)
Subject: RE: RO2918, Jordan Ranch
Date: Friday, September 28, 2012 10:54:37 AM

Dear Ms. Roe,

Thank you for the feedback and for sharing your perspective on the status of the petroleum remediation at the Jordan Ranch property. I have had the opportunity to speak to Mr. Munger at length and I have given your message, and my interpretation of the status of our project, much thought this week. I needed to give your message some thought, and spend some time reviewing Engeo's draft reports, prior to a response.

Please understand, in the brief time I have known you, I have come to respect your intelligence, professional experience, and style, and while I truly appreciate your effort with this project, I feel we are simply not able to satisfy your technical requests at this time. Given Engeo's experience, the relatively small scope and zone of contamination due to a leak from an underground fuel storage tank that was removed years ago, I am perplexed by our inability to meet your needs. Please trust that it is not intentional and not due to a lack of effort on Engeo's part. As we have discussed, and given my nearly 20 year relationship and experience working with Engeo and its staff, I am completely committed to them. In my experience, they are an outstanding firm by every measure and I have found them without peer.

Assigning responsibility for delays to all of us as professionals, I feel it important that we keep sight of the overall goals and I am hopeful you can see the merit of allowing the proposed trench/groundwater extraction operation to proceed while weather conditions permit. I apologize that the analysis and paperwork may not be up to your standard and it is not my intent to minimize your comments and concerns with the draft reports that you provided in such a timely fashion, as you promised. I realize some of your concerns with the quality of the paperwork are for my protection and the protection of my property and I appreciate that. Since we are comfortable with the proposed approach and as we are responsible for all costs of pursuing this method, I see no downside to the Alameda County Environmental Health Department in allowing this to proceed immediately.

In the meantime and until you have had a chance to respond to this message, we will work within the confines of the existing approved Corrective Action Plan and weigh other alternatives to achieve our goals as our interpretation of the test results direct us over the next several months. We remain committed to the full remediation and closure of the site and we will continue to make our best efforts in doing so.

Respectfully,

Ravi Nandwana

From: Roe, Dilan, Env. Health [mailto:Dilan.Roe@acgov.org]

Sent: Tuesday, September 25, 2012 4:03 PM
To: Ravi Nandwana
Cc: Shawn Munger; Morgan Johnson
Subject: RO2918, Jordan Ranch

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

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