



ALAMEDA COUNTY  
**HEALTH CARE SERVICES**  
AGENCY  
ALEX BRISCOE, Agency Director



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

August 19, 2015

Raj Mulkh & Bhatia Kulwinder, et. al.  
4445 Pinewood Drive  
Union City, CA 94587-4824

Vintners Distributors, Inc  
28456 Century Street  
Hayward, CA 94545-4800  
(Sent via email to: [vintnersdist.com](mailto:vintnersdist.com))

Hollis Phillips  
ARCADIS U.S., Inc  
100 Montgomery, Suite 300  
San Francisco, CA 94104  
(Sent via email to:  
[Hollis.Phillips@arcadis-us.com](mailto:Hollis.Phillips@arcadis-us.com))

Jim Smith  
BP Contracts Manager  
201 Helios Way, Sixth Floor  
Houston, TX, 77079  
(Sent via email to:  
[Jim.Smith2@bp.com](mailto:Jim.Smith2@bp.com))

Subject: Request for Brief Data Gap Work Plan; Fuel Leak Case No. RO0000076 and GeoTracker  
Global ID T0600100110, ARCO #04931, 731 W Macarthur Blvd, Oakland, CA 94609

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Site Investigation Report*, dated June 26, 2015. The document was prepared and submitted by ARCADIS, U.S., Inc. (ARCADIS). The referenced report documents the installation of soil bore SB-7 downgradient and across the street from the subject property to define the downgradient extent of the groundwater plume, a sensitive receptor survey (wells, basements, and etc.) and the installation of vapor wells SV-7 and SV-8 in proximity to the upgradient property line in order to investigate the potential for vapor intrusion to an offsite residential structure that is known to contain a partial basement.

ACEH has evaluated the additional data and recommendations presented in report to determine if the site is eligible for closure as a low risk site under the State Water Resource Control Board's Low Threat Closure Policy (LTCP). Based on ACEH staff review, ACEH is in partial agreement with the report, and the site now appears to meet the LTCP Media-Specific Criterias for Groundwater as well as the Direct Contact and Outdoor Air; however, with the additional data the site does not meet the Media-Specific Criteria for Vapor Intrusion to Indoor Air (see Geotracker for details). Specifically, the presence of a partial basement at the immediately adjacent residential structure, the collection of a soil vapor sample at a depth of 5 feet below grade surface (bgs) rather than at 5 feet below the foundation depth, the assumed 5 foot bioattenuation zone, the presence of less than 4% oxygen (1.3%) in this zone, coupled with an elevated benzene detection limit (non detectable at < 180 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ]) and not less than the 85  $\mu\text{g}/\text{m}^3$  LTCP criteria) at a vapor well location approximately 15 to 20 feet from the residence, does not support selection of Scenario 4a of the LTCP at the site.

Therefore, at this juncture ACEH requests that you prepare a brief Data Gap Work Plan that is supported by a focused Site Conceptual Model (SCM) for data collection to address the Technical Comments provided below.

#### **TECHNICAL COMMENTS**

- 1. LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – As discussed above, our review of the case files indicates that the site data collection and analysis fail to support the requisite characteristics of one of the four scenarios. At this time it appears appropriate to submit a brief Data Gap Work Plan, utilizing existing, previously accepted, standard protocols used at the site to, at a