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HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Director

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July 21, 2015

Perry Pineda
Shell Oil Products US
20945 S. Wilmington Ave.
Carson, CA 90810-1039
(*Sent via E-mail to: perry.pineda@shell.com*)

Rodney and Janet Kwan
1834 Alameda Ave.
Alameda, CA 94501

Subject: Case File Review for Fuel Leak Case No. RO0000145 and GeoTracker Global ID T0600101876, Shell/Auto Tech West, 2703 Martin Luther King, Jr. Way, Oakland, CA 94612

Dear Mr. Pineda and Mr. and Ms. Kwan:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, "*Subsurface Investigation Report,*" dated June 5, 2015 (Report). The Report, which was prepared on Shell's behalf by Conestoga-Rovers & Associates, Inc., presents results from on-site and off-site soil, soil vapor, and groundwater sampling. The scope of work, which was proposed in a work plan dated July 19, 2012, was conditionally approved by ACEH on August 15, 2012. Subsequent to work plan approval, the work was substantially delayed by repeated attempts to obtain access to off-site properties. One groundwater monitoring well and two soil vapor probes proposed in the July 19, 2012 work plan were not installed because property owners would not allow access. On-site soil vapor probes VP-2 at 3 and 5 feet bgs and VP-3 at 3 feet bgs could not be sampled due to water in the probes.

On-site soil vapor samples contained up to 800,000,000 micrograms per cubic meter ($\mu g/m^3$) TPHg and 690,000 $\mu g/m^3$ benzene. Off-site soil vapor samples contained up to 320,000 $\mu g/m^3$ TPHg and 770 $\mu g/m^3$ benzene. These maximum concentrations exceed Environmental Screening Levels (San Francisco Bay Regional Water Quality Control Board December 20134) for both residential and commercial land use. The concentrations of TPHg and benzene detected in off-site soil vapor sample VP-13-3 are higher than the concentrations detected in nearby soil vapor sample VP-12-2 and previously detected at nearby probe VP-7. Further assessment of the potential for vapor intrusion is required. We request that you implement an additional sampling event to evaluate these initial detections. Soil vapor samples are to be collected using approved methods from soil vapor probes VP-3, VP-7, VP-12, VP-13, and VP-14. Sampling of vapor probes VP-2 and VP-3 where samples could not be collected due to water in the probes is to be attempted.

Please present an assessment of the results of the soil vapor sampling in a report no later than October 13, 2015. We have no objection to updating the site conceptual model (SCM) as recommended in the "*Subsurface Investigation Report,*" dated June 5, 2015. The SCM should incorporate the additional soil vapor sampling results and should include the history of remedial actions for the site. Excavation in the area of hydrocarbon-impacted soil followed by biosparging was the remedial alternative selected for this site in 2008. A public comment period on the proposed remedial action took place from September 15, 2008 to October 15, 2008. No