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HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
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REBECCA GEBHART, Interim Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
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March 17, 2017

Ms. Andrea Wing
Shell Oil Products US
20945 S. Wilmington Ave.
Carson, CA 90810
(*Sent via E-mail to:* mailto:andrea.wing@shell.com)

Rodney and Janet Kwan
1834 Alameda Ave.
Alameda, CA

Subject: Approval to prepare a Pilot Study Work Plan, and Request for Additional Documents - Fuel Leak Case No. RO0000145 and GeoTracker Global ID T06000101876, Shell/Auto Tech West, 2703 Martin Luther King Jr., Oakland, CA 94612

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACEH) staff has reviewed the fuel leak case files for the above referenced sites including the *Revised Corrective Action Plan* (Revised CAP), dated May 27, 2016; the *Second Quarter 2016 Groundwater Monitoring Report*, dated July 18, 2016; and the *Second Semiannual 2016 Groundwater Monitoring Report,* dated January 17, 2017, prepared by AECOM on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Equilon). The Revised CAP summarizes the site conditions and evaluated five currently applicable remedial approaches (no action, monitored natural attenuation [MNA], excavation, bio-sparge system, and pulsed oxygen injection) for addressing the petroleum hydrocarbon and oxygenate impacts identified beneath the site. Note that in the previous Site Conceptual Model and Feasibility Study/Corrective Action Plan (SCM/FS/CAP), dated February 5, 2008, prepared by CRA, excavation was recommended with a bio-sparge component. Based on the comparative analysis of the five remedial alternatives, AECOM recommends a pilot study to evaluate pulsed oxygen injection to remediate the impacted capillary fringe and groundwater. The pilot study data will be used to characterize the oxygen generation and determine design parameters including radium of influence (ROI), injection pressure and oxygen injection interval. The proposed pilot study location will be in the vicinity of MW-4 and MW-5 where one of the highest concentrations of benzene and TPH-gasoline and benzene reside. The proposal to prepare a Pilot Study Work Plan is acceptable.

Additionally, ACDEH has evaluated the data and recommendations presented in the above-mentioned reports, in conjunction with the case files, to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, we have determined that the site fails to meet the LTCP General Criteria e (Site Conceptual Model); and the Media-Specific Criteria for Groundwater and the Media-Specific Criteria for Vapor Intrusion to Indoor Air.

Additional data may be available that ACDEH is not aware of, or may not have been submitted, and therefore has not been incorporated in to ACDEH's review. If additional data is made available, the data can be incorporated in future LTCP reviews. The evaluation of the site under the LTCP that is presented below is intended to initiate further discussions, submittal of other available documents, or the collection of additional data in order to determine if or when the site can be closed under the LTCP and to document current LTCP data gaps.