

**Response to Orange County Health Care Agency Comments  
Regarding the Closure of Sharda AM/PM, Claim 18013**

**Comment 1:** Secondary source has not been removed to the extent practicable.

**Response 1:** As defined in the Policy the secondary source has been removed to the extent practicable. Additional removal or active remediation shall not be required unless (1) a threat exists to human health or (2) the groundwater plume does not meet the definition in the Policy. Both of these qualifiers are met.

**Comment 2:** The Closure Summary negates the potential risk from soil vapor intrusion that was identified for the Site by stating the area in question is capped with asphalt or concrete. Please note that the modeling conducted by OCLOP takes surface completion into consideration which is reflected in the predicted incremental lifetime cancer risks ranging from  $7.1 \times 10^{-6}$  to  $1.5 \times 10^{-5}$ , that were noted for the Site.

**Response 2:** A naphthalene concentration in soil at 3.66 mg/L in well MW-7 at 10 feet below ground surface and a distance of 40 plus feet from either the mini mart or the building on the neighboring property does not create a vapor intrusion risk. Additionally, the case meets the vapor intrusion exclusion being an active commercial petroleum fueling facility.