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June 11, 2012

Mr. Steven Hill
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612
(sent via electronic mail to: SHill@waterboards.ca.gov)

Subject: Notice of Case Referral; Fuel Leak Case No. RO0000453; (Global ID # T0600101794); Celis Service Station, 4000 San Pablo Avenue, Emeryville, CA 94608

Dear Mr. Hill:

This is a notice of case referral for the subject site. Alameda County Environmental Health (ACEH) is transferring oversight of the subject case to the San Francisco Bay Regional Water Quality Control Board.

The subject site is one of seven sites with a co-mingled soil and groundwater contaminant plumes sites (Oakland National Engravers; RO0000079; Dunne Quality Paints; RO0000073; San Francisco French Bread Company; RO0000171; Celis Service Station; RO0000453; SNK Andante; RO0002530; Oak Walk; RO0002733, and Magnolia Terrace; RO0003004). The groundwater contaminant plume extends a minimum distance of approximately 1,200 feet in length (see attached paleochannel figure). The soil and groundwater plumes appear to have moved through a series of granular paleochannels (with significant interconnectivity) that is present beneath the sites.

The subject site appears to have contributed significant residual contamination to the Oak Walk site (RO0002733). A Corrective Action Plan (CAP) had previously been generated and fully implemented for the Oak Walk site after a required 30-day public participation period was conducted. Unfortunately the remedial efforts at Oak Walk were not successful in meeting the stated CAP objectives and ACEH requested further a further remedial effort in November 2011. Groundwater concentrations on the adjacent Oak Walk site in September 2010 were up to 1,800 µg/l TPHd, 3,400 µg/l TPHms, 49,000 µg/l TPHg, and 14,000 µg/l benzene (and included other standard fuel related compounds). In March 2012, concentrations up to 2,200 µg/l TPHd, 3,500 µg/l TPHms, 26,000 µg/l TPHg, and 9,500 µg/l benzene were present. These groundwater concentrations indicate that a significant residual source remains at, or in proximity to, the Oak Walk site.

Please be aware that the extent of contaminant migration from the Celis Service Station site on to the adjacent SNK Andante Project site (RO0002530) appears to have been partly controlled by very old abandoned foundational elements that apparently allowed free-phase and groundwater with elevated concentrations to migrate into and beneath that site. While speculative, this may have been an element of contaminant migration into the Oak Walk site (RO0002733) from the Celis site. Please also be aware that the presence of MTBE beneath Oak Walk may tie this contamination to the Celis Service Station as MTBE is generally not seen at the San Francisco Bread Company (RO0000171) site. Finally please be aware that rather than the submittal of an updated CAP, a risk assessment was submitted for the Oak Walk site in response to the request for further remedial efforts.

Recently ACEH undertook conversations with the consultant of a potential buyer for the Oak Walk property. The buyer's consultant expressed the general opinion that remediation of the remaining contamination would be most beneficial to the site properties, rather than to propose to leave elevated residual contamination in-place beneath residential housing stock (identified as the most vulnerable of onsite residential units by existing reports) with the use of a risk assessment. This is in-line with the general view of ACEH.