



July 7, 2017

San Francisco Bay Area Rapid Transit District  
300 Lakeside Drive, 17<sup>th</sup> Floor  
Oakland, CA 94612  
Attention: Gary Jensen (Sent via e-mail to [gjensen@bart.gov](mailto:gjensen@bart.gov))

Subject: Technical Report Request for Fuel Leak Case No. RO0003171 and GeoTracker Global ID T10000007044, BART Maintenance Shop, 601 East 8<sup>th</sup> Street, Oakland, CA 94606-3606

Dear Mr. Jensen:

Alameda County Environmental Health (ACDEH) has reviewed the May 4, 2017 Updated Site Conceptual Model Data Gap Investigation Work Plan prepared and submitted on your behalf by CDM Smith (CDM).

ACDEH has evaluated the data in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACDEH staff review, ACDEH concurs that no further investigation activities are warranted for this case and the case closure process can commence after successful upload and review of the following documents.

Please address the following technical comments and submit the requested reports by the dates provided below.

### **TECHNICAL COMMENTS**

- 1. LTCP General Criteria e (Site Conceptual Model):** ACDEH acknowledges the well survey performed using the Department of Water Resources (DWR) well data base, but requests review of Alameda County Public Works Agency (ACPWA) well data base for a complete inventory of vicinity water supply wells. The ACPWA and DWR data bases can provide considerably different results and therefore warrant review of both data bases. As a part of the SCM, please perform a Sensitive Receptor Study to determine if sensitive receptors such as irrigation, domestic, and/or industrial wells are present within a radius of 1,500 feet of the site. Please provide an SCM Addendum comprised of a figure on which the locations of those types of wells are plotted and a table similar to the figure and table provided in Attachment 2. The Well Survey request form is also included in Attachment 2.
- 2. Site Management Plan for the Management of Petroleum Contaminated Soil and Groundwater:** ACDEH requests submittal of a Site Management Plan (SMP) that describes BART's procedures documenting standard contaminant management methodologies at BART facilities. If an SMP exists for BART facilities, please submit it; however, if a SMP does not exist, please prepare and submit a SMP for this facility which includes, but is not limited to, the following, by the date provided below.
  - Use of Photoionization Detectors (or equivalent) to identify impacted soil and to identify sampling locations;
  - Appropriate sample collection procedures and preservation techniques;

- Appropriate excavation confirmation sampling (at a minimum, bottom sampling intervals mirroring UST removal confirmation sampling and sidewall confirmation sampling mirroring overexcavation sampling intervals [e.g. 20 foot centers and at signs of impacted soil]), and segregation of impacted from non-impacted soil;
- Appropriate stockpile tarping;
- Establishing appropriateness of soil reuse either onsite or offsite through adherence to the draft SF RWQCB guidelines entitled *Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste*, dated October 20, 2006, or other appropriate documents;
- Contaminated groundwater sampling, handling, and management procedures.

Each and all of these future actions, procedures, protocols, and etc. will be requested to be documented in a final future excavation report to be submitted to the County's ftp site and to GeoTracker.

**3. Electronic Submittal of Information (ESI) Compliance:** Currently, site data and documents are maintained in two separate electronic databases – ACDEH's File Transfer Protocol (FTP) site and the SWRCB's Geotracker website. Both databases act as repositories for Portable Document Format (PDF) files of regulatory directives and reports, but only Geotracker has the functionality to store electronic compliance data in Electronic Deliverable Format (EDF) including the following:

- analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation, including influent/effluent water samples from remediation systems (EDF files);
- complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO\_REPORT files);
- stand alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO\_MAP files);
- stand alone boring logs with depth to the screened interval and the length of screened interval for any permanent monitoring well installed (GEO\_BORE files).

The SWRCB is responsible for the overall operation and maintenance of the Geotracker System, and ACDEH, as lead regulatory agency, is responsible to ensure that the Geotracker database is complete and accurate for sites regulated by ACDEH under the Local Oversight Program (LOP) and Site Cleanup Program (SCP) (SWRCB March 2011 document entitled *Electronic Reporting Roles and Responsibilities*). Please upload the requested data in accordance with California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895 to Geotracker.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **September 12, 2017** – ACPWA Well Survey  
File to be named: RO3171\_SCM\_ADDEND\_R\_yyyy-mm-dd

- **September 12, 2017** – Submit Site Management Plan  
File to be named: RO3171\_SMP\_R\_yyyy-mm-dd
- **September 12, 2017** – Electronic Submittal of Information (ESI) Compliance  
File to be named: RO3171\_ESI\_R\_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request. Online case files are available for review at the following website: <http://www.acgov.org/aceh/lop/ust.htm>

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG  
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party(ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

Attachment 2 – Sample Well Survey and Table and Sensitive Receptor Survey plotted  
and Alameda County Public Works Agency's *Well Completion Report Request*

cc: Ryan Wood, CDM Smith, 100 Pringle Avenue, Suite 300, Walnut Creek, CA 94596, (Sent via E-mail to: [woodr@cdmsmith.com](mailto:woodr@cdmsmith.com))  
Karel Detterman, ACDEH, (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))  
Dilan Roe, ACDEH, (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Paresh Khatri, ACDEH, (Sent via E-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Electronic File, GeoTracker

## Attachment 1

### Responsible Party(ies) Legal Requirements / Obligations

#### REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

#### ELECTRONIC SUBMITTAL OF REPORTS

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program File Transfer Protocol (FTP) site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to SCP sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

#### PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional. For your submittal to be considered a valid technical report, you are to present site-specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

#### AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

## REQUIREMENTS

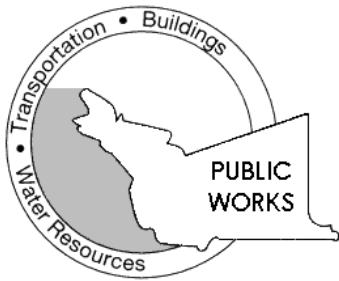
- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

## Submission Instructions

- 1) Obtain User Name and Password
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org).
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

# ATTACHMENT 2



County of Alameda  
Public Works Agency  
Water Resources Section  
399 Elmhurst Street, Hayward, CA 94544-1395  
James Yoo Phone: (510) 670-6633 Fax: (510) 782-1939

FOR GENERAL DRILLING PERMIT INFO.: [www.acgov.org/pwa/wells](http://www.acgov.org/pwa/wells)

## WELL COMPLETION REPORT REQUEST—OWNER

Use this form to request a copy of the Well Completion Report or records on file with the Alameda County Public Works Agency, Water Resources Section, for a well you own. Describe the well below. California Water Code Section 13752 permits release of Well Completion Reports from DWR files on written request by the well owner. DWR requires the township, range, and section where the well is located to start a search. Attach a map or a sketch with north indicated and as much identifying information listed below as possible. Use additional paper if necessary.

Location of well (city or county) \_\_\_\_\_ Year drilled \_\_\_\_\_

Street address \_\_\_\_\_

Distances and directions from cross streets or other landmarks \_\_\_\_\_

Township \_\_\_\_\_, Range \_\_\_\_\_, Section \_\_\_\_\_, Quadrant \_\_\_\_\_, Use \_\_\_\_\_

Owner at time of drilling \_\_\_\_\_ Driller \_\_\_\_\_

Depth of well \_\_\_\_\_ Diameter and type of casing \_\_\_\_\_

Other identifying information, such as assessor's parcel number (on tax statement), subdivision or tract, lot number, well number, well completion report number, driller, date completed, (other) \_\_\_\_\_

I certify that I am the present owner of the well described above.

**Complete this part only if you wish a copy sent to someone other than yourself.** Please send a copy of this Well Completion Report to:

\_\_\_\_\_  
Name (please print)

\_\_\_\_\_  
Name/Company

\_\_\_\_\_  
Address

\_\_\_\_\_  
Address

\_\_\_\_\_  
City, State, and Zip Code

\_\_\_\_\_  
City, State, Zip Code

\_\_\_\_\_  
Telephone ( )

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Telephone ( )

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Fax ( )

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Fax ( )

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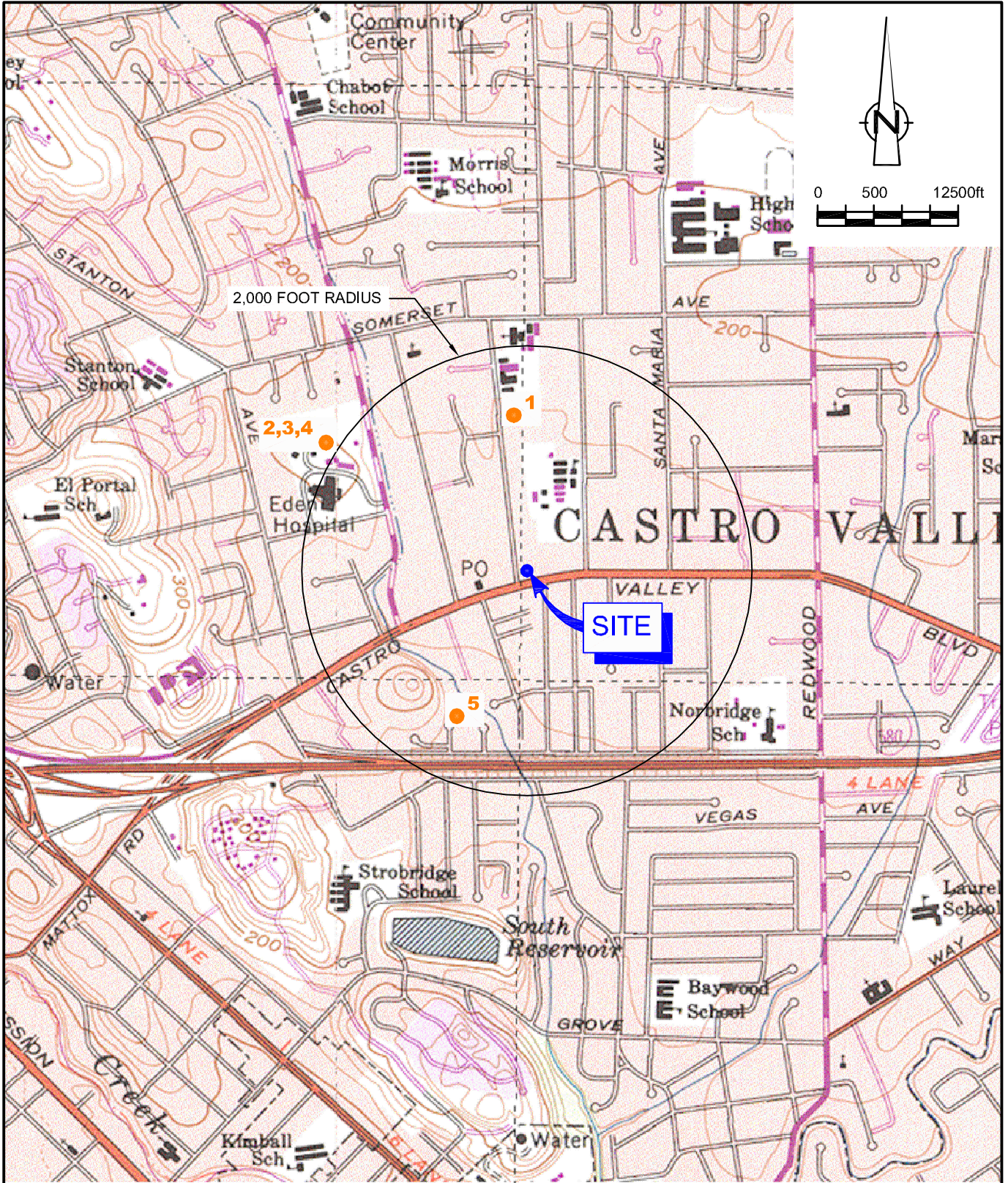
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Owner's Signature Authorizing Release

**WELL SURVEY RESULTS  
CHEVRON STATION 9-6991  
2920 CASTRO VALLEY BOULEVARD  
CASTRO VALLEY, CALIFORNIA**

<i>Well No./ Figure ID</i>	<i>Well Owner</i>	<i>Well Address Street</i>	<i>City</i>	<i>Total Well Depth (ft)</i>	<i>Date Installed</i>	<i>Distance/Direction from Site (ft) (approx)</i>	<i>Well Use</i>
1	Private	20036 Anita Avenue Lake Chabot Road	Castro Valley	51	2/19/1953	1,400 N	Domestic
2	Eden Township Hospital	1,000' south of Williams	Castro Valley	150	9/30/1953	2,000 NW	Test well
3	Eden Township Hospital	Eden Township Hospital	Castro Valley	250	9/9/1952	2,000 NW	Domestic
4	Eden Township Hospital	Eden Township Hospital	Castro Valley	60	7/11/1952	2,000 NW	Cooling system return
5	Sam Wallace	Tyee Court	Castro Valley	52	7/3/1953	1,400 S-SW	Domestic





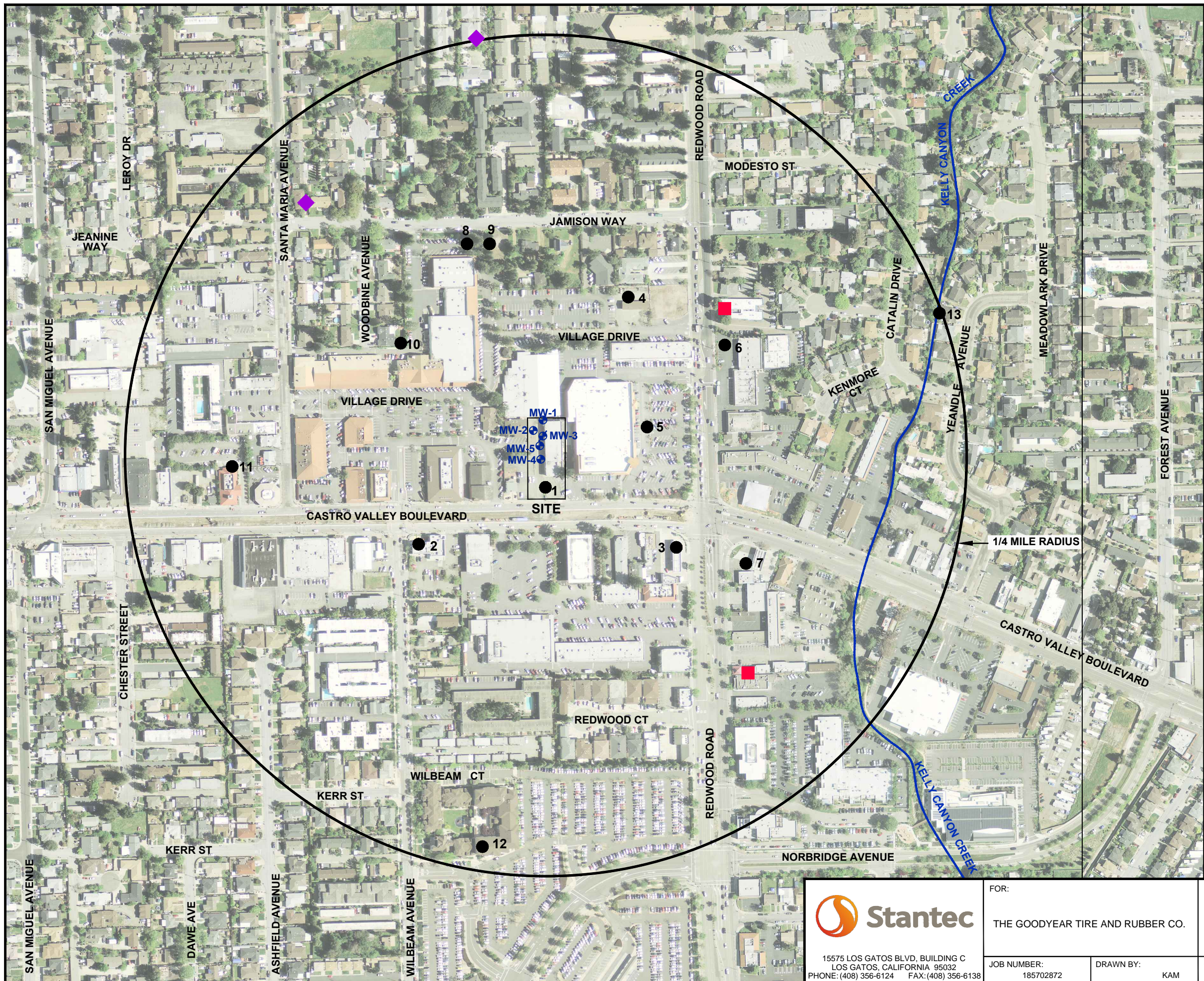
SOURCE: TOPO! MAPS.

**LEGEND**

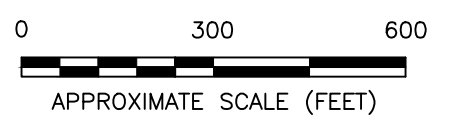
- APPROXIMATE WELL LOCATION



**WELL SURVEY MAP**  
**CHEVRON SERVICE STATION 9-6991**  
**2920 CASTRO VALLEY BOULEVARD**  
*Castro Valley, California*



- LEGEND:**
- PROPERTIES WITH WELLS WITHIN 1/4-MILE OF SITE
  - MEDICAL OFFICES WITHIN 1/4-MILE OF SITE
  - ◆ SCHOOLS WITHIN 1/4-MILE OF SITE
  - ⊕ ACTIVE GROUNDWATER MONITORING WELL LOCATION
  - ⊕ DESTROYED GROUNDWATER MONITORING WELL LOCATION



**Stantec**  
 15575 LOS GATOS BLVD, BUILDING C  
 LOS GATOS, CALIFORNIA 95032  
 PHONE: (408) 356-6124 FAX: (408) 356-6138

FOR: THE GOODYEAR TIRE AND RUBBER CO.	
JOB NUMBER: 185702872	DRAWN BY: KAM

<b>WELL &amp; SENSITIVE RECEPTOR SURVEY</b>	
GOODYEAR DEX #9578	
3430 CASTRO VALLEY BOULEVARD	
CASTRO VALLEY, CALIFORNIA	
CHECKED BY: KM	APPROVED BY: GM

FIGURE: <b>6</b>
DATE: 01/08/15