



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
700 Heinz Avenue  
Berkeley, California 94710-2721



**Gavin Newsom**  
Governor

November 4, 2021

Mr. Robert Jason Pinoli  
Mendocino Railway  
Foot of Laurel Street  
Fort Bragg, California 95437  
[rijp@mcn.org](mailto:rijp@mcn.org)

REQUEST SUBMITTAL RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) FACILITY INVESTIGATION (RFI) WORKPLAN ADDENDUM, CALIFORNIA WESTERN RAILROAD (SKUNK TRAIN), FOOT OF LAUREL STREET, FORT BRAGG, CALIFORNIA (SITE CODE: 520041)

Dear Mr. Pinoli:

In 2013 Mendocino Railway completed a Resource Conservation and Recovery Act (RCRA) Facility Investigation Report (RFI Report) in accordance with terms of the June 2005 Corrective Action Consent Agreement (Docket HWCA: P1-04/05-011) for the California Western Railroad Site. On May 3, 2013, the Department of Toxic Substances Control (DTSC) approved the RFI Report while indicating that additional further soil or groundwater characterization investigation is required at the Site. The required additional investigation includes:

- Additional soil investigation to better characterize the extent of lead in all parts of SWMU #35;
- Analysis for arsenic in all future soil samples;
- Additional investigation of groundwater to better identify groundwater gradients and delineate dissolved contaminant concentrations.

In 2013, DTSC required that Mendocino Railway submit an RFI Workplan Addendum, addressing the additional work listed above, by July 1, 2013. The RFI Workplan Addendum would also include a Conceptual Site Model and a discussion of field and laboratory quality assurance and quality control (QA/QC), as well as the other necessary elements of an RFI Workplan.

Submittal of the draft RFI Workplan Addendum was postponed because of financial hardship experienced by Mendocino Railway. However, in 2018, DTSC's analysis indicated that Mendocino Railway financial standing had improved to point where DTSC's oversight cost could again be paid and investigation work resume. Further delay in submittal of the requested RFI Workplan Addendum could negatively impact public health and the environment. DTSC therefore requires that Mendocino Railway, under the provisions set forth in Section 6.1 of the Corrective Action Consent Agreement (Docket HWCA: P1-04/05-011), submit a draft RFI Workplan Addendum within 60 days of receipt of this letter.

If you have any questions regarding this letter, please contact me at (510) 540-3776 or at [Tom.lanphar@dtsc.ca.gov](mailto:Tom.lanphar@dtsc.ca.gov).

Sincerely,

*Thomas P. Lanphar*

Thomas P. Lanphar  
Senior Hazardous Substance Scientist  
Site Mitigation and Restoration Program – Berkeley Office  
Department of Toxic Substances Control

cc: (via email)

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