



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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(510) 567-6700

February 5, 2015

Mr. Doug Debs (Sent via e-mail to [dougdebs2472@yahoo.com](mailto:dougdebs2472@yahoo.com))  
Niles Canyon Railway  
6 Kilkare Road  
Sunol, CA 94586

Subject: Technical Report Request for Site Cleanup Program Case No. RO0003141 and  
GeoTracker Global ID T10000006021, Niles Canyon Railway, 6 Kilkare Road, Sunol, CA  
94586

Dear Mr. Debs:

ACEH has evaluated the data presented in the draft *Report of Soil Remediation Activities* (Report) dated August 18, 2014 in conjunction with the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) adopted in 2012. The draft Report was intended to transmit preliminary site data prior to finalization of the Report. Thank you for submitting the draft Report, which details an oil spill, identified in the Report as No. 6 Fuel Oil, also known as Bunker C oil, from a Niles Canyon Railway steam locomotive along approximately 46 feet of railroad track adjacent to the Sunol Depot.

As a result of discussions during our February 2, 2015 call, it was apparent to ACEH that sufficient site data was presented to eliminate data gaps concerning the Vapor Intrusion to Indoor Air Media Specific Criteria, but there was insufficient data presented to eliminate data gaps concerning the Groundwater Media Specific Criteria and the Direct Contact to Outdoor Air Media Specific Criteria. The Vapor Intrusion to Indoor Air Media Specific Criteria appears to be satisfied because the spill is comprised of Bunker C oil, which, according to the Leaking Underground Fuel Tank (LUFT) Manual, September 2012, is a middle-distillate fuel which tends to be denser, much less volatile, and much less soluble than gasoline, and contains trace amounts of aromatic compounds (including benzene, toluene, ethylbenzene and xylenes [BTEX]). The six soil samples collected from a depth of 0.5 foot did not detect BTEX.

Therefore, ACEH requests that you address the Technical Comments provided below in a revised Report. Please e-mail the revised Report to my attention by April 6, 2015. I will send comments to facilitate finalization of the Report including uploading the Report to ACEH's ftp site and Geotracker.

**Technical Comments:**

1. **Groundwater Media Specific Criteria** – Because the oil spill occurred in the Sunol Valley, and the Sunol Valley is an existing beneficial use area, please perform a Sensitive Receptor Study to determine if the oil spill could potentially impact groundwater. Our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of the plume length. Please revise the Report to include the following:
  - a. Please locate and plot on a figure storm drains and outfalls in the vicinity of the oil spill;

- b. The groundwater flow direction at the site is unknown at the site because of the lack of site data. Please utilize ACEH's ftp site and Geotracker to locate nearby sites with groundwater data to provide an estimate of the local groundwater flow direction and depth to groundwater. Plot the adjacent sites on a figure and in a table list the adjacent site addresses, groundwater direction(s), depth to groundwater, and date.
  - c. Please perform a Preferential Pathway and Sensitive Receptor Study to determine if sensitive receptors are present in a radius of 1,500 feet of the site. ACEH requests review of both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) well data sources for a complete inventory of vicinity water supply wells. ACEH requests the identification and location on a site vicinity figure all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including irrigation, water supply, industrial, dewatering, and cathodic protection wells within a 1,500-foot radius of the site. Additionally, please identify on the same figure beneficial resources and other sensitive receptors including, but not limited to, groundwater classification, wetlands, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc. Please plot the numbered well locations on an aerial photography-based figure and provide a table with the same numbered well locations and their distance from the site, similar to the example provided in the Attachment 2.
- 2. Direct Contact to Outdoor Air Media Specific Criteria** – The draft Report identified the oil spill as No. 6 Fuel Oil, also known as Bunker C oil, and according to the LTCP, where soil is affected by either is waste oil or Bunker C oil, sampling and analysis for naphthalene and polyaromatic hydrocarbons (PAHs) are necessary. Please collect soil samples from two depths, 0 to 5 feet and 5 to 10 feet below ground surface from the vicinity of SS-2, where 600 milligrams per kilogram (mg/kg) total petroleum hydrocarbons as diesel (TPHd) and 4,200 mg/kg TPH motor oil (TPHmo) were detected at a depth of 0.5 feet in fine grained soil. ACEH agrees that the result from sample SS-6 may not be representative because the sample was comprised of ballast rock. Please analyze each soil sample for TPH gasoline, TPHd, TPHmo, BTEX, MTBE (required by LTCP), and PAHs including naphthalene (by 8270-SIM), summarize the results in a table and document sampling and analytical procedures in the Report.
- 3. Disposal Documentation:** Please include all disposal documentation in the Report.

**TECHNICAL REPORT REQUEST:**

- **April 6, 2015** – E-mailed revised Report to [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)

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.

Mr. Doug Debs  
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Sincerely,

Karel Detterman, PG  
Hazardous Materials Specialist

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

Attachment 2 - Preferential Pathway and Sensitive Receptor Study Figure and Table

cc: James Gribi, Gribi Associates (Sent via E-mail to: [jgribi@gribiassociates.com](mailto:jgribi@gribiassociates.com))  
Dilan Roe, ACEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Karel Detterman, ACEH (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))  
GeoTracker, Electronic Case File

## 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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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 6735, 6835, and 7835.1) 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 registered 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 fuel leak case meet this requirement.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later 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 SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<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
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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:

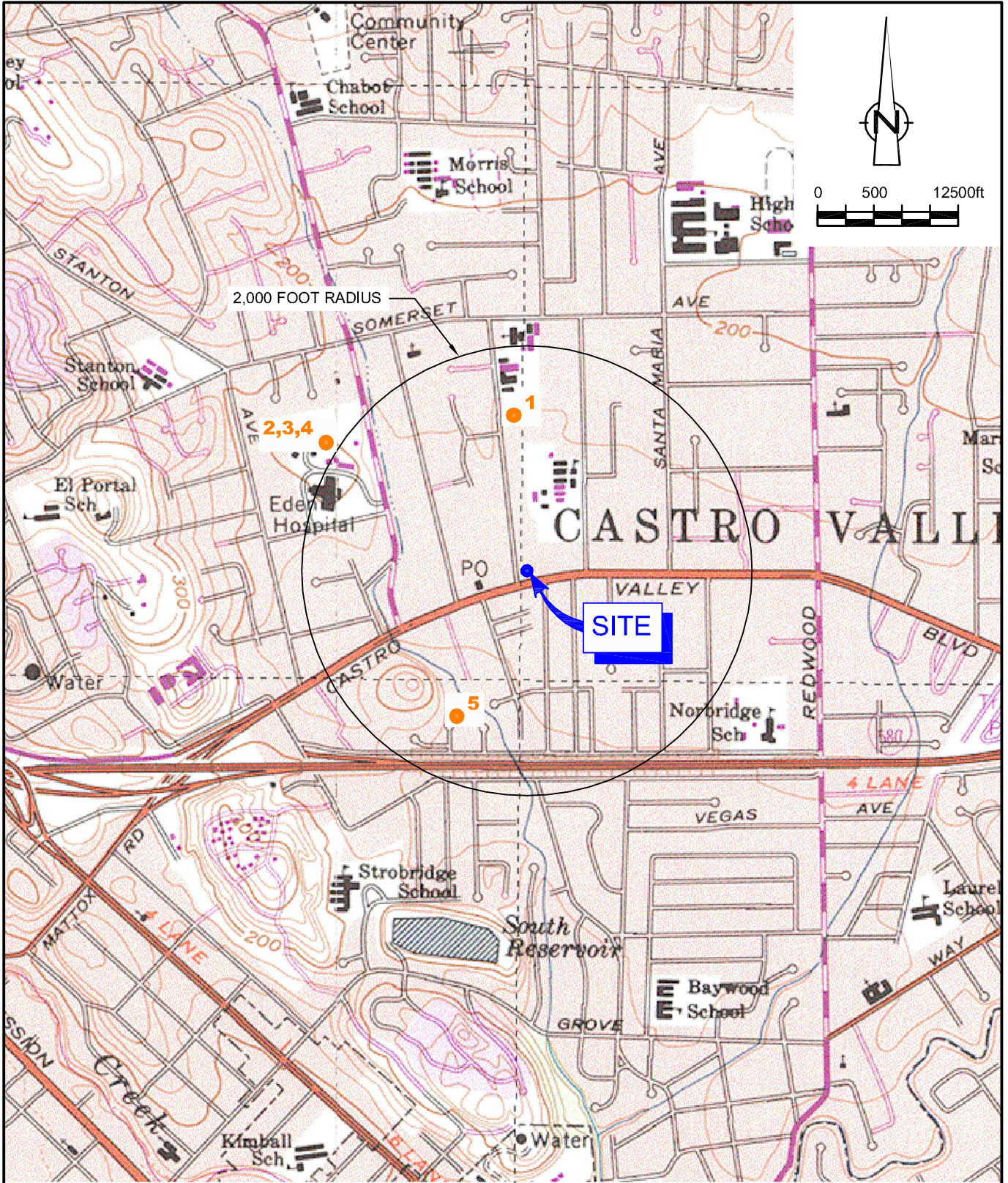
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

## 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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) 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





SOURCE: TOPO! MAPS.

**LEGEND**

- APPROXIMATE WELL LOCATION



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

**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