



Linda S. Adams
Secretary for
Environmental Protection

**California Regional Water Quality Control Board
North Coast Region
Geoffrey M. Hales, Chairman**

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Arnold
Schwarzenegger
Governor

February 16, 2010

Mr. James R. Rabe
Masonite Corporation
1955 Powis Road
West Chicago, IL 60185

Mr. Jeff Adams
Developers Diversified Realty
1401 Willow Pass Road, Suite 850
Concord, CA 94520

Mr. Thomas C. Richardson
International Paper
6400 Poplar Avenue
Memphis, TN 38197

Dear Messrs. Rabe, Richardson, and Adams:

Subject: Comments on Report: *Results of PCB Investigation on the Masonite Property*

File: Masonite Corporation, 300 Ford Road, Ukiah, California
Case No. 1NMC042

Regional Water Board staff reviewed the December 2, 2009 document, *Results of PCB Investigation on Masonite Property* (Report), prepared by SCS Engineers for the former Ukiah Masonite facility and have the following comments.

The Report states that transformers with fluid containing polychlorinated biphenyls (PCBs) were removed from the former Masonite property prior to 1999. New transformers, containing non-PCB mineral oil, were then installed. The new transformers were vandalized resulting in the release of non-PCB transformer fluid. Due to the vandalism, the potential for PCB contamination was assessed around the area where transformers had been located and vandalized. A workplan to investigate possible PCB contamination was prepared, and Regional Water Board staff concurred with the workplan with the provision that groundwater sampling would also be required if PCB contamination was discovered.

The Report describes the collection of soil samples at 12 locations around the concrete pad where the pad-mounted transformer was located. From the 12 locations, 17 soil samples were analyzed for PCBs. PCBs were detected in only one sample at 0.010 mg/kg (this level is equivalent to the laboratory method detection level). For

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comparison purposes, the California Human Health Screening Level¹ (CHHSL) for PCBs in soil for residential exposures is 0.089 mg/kg and for commercial exposures is 0.30 mg/kg. CHHSLs are levels that have no regulatory authority, but can be used to indicate whether a health risk exists from exposure to chemicals. Under most circumstances it can be assumed that there is a negligible human health risk to people who live or work at the site if a chemical is present in soil at a level lower than the corresponding CHHSL. The PCB levels presented in the Report are significantly below both the residential and commercial CHHSLs. Since PCB contamination was not found (with the exception of one sample detected at the level of detection, well below the most protective CHHSL) groundwater analyses for PCBs is not required.

The data that you have provided in the Report allow us to agree that the investigation of possible PCB contamination in the area described by the Report is complete. This determination is based on a review of the data submitted in the Report and assuming that the data reviewed are accurate and representative of site conditions. Please be advised that case closure for the site will be evaluated only after all areas of the site have been investigated and remediated.

You requested concurrence with a proposal to thinly spread cuttings from the soil borings generated in this investigation. You did not present any information characterizing the cuttings apart from the PCB analyses. Given the variety of contaminants found in different areas of the site, unless you support the request with additional, more extensive analysis, you may return the soil cuttings only to the immediate vicinity of the PCB investigation area. You are required to ensure that the cuttings are placed in a manner so that they are not subject to erosion, do not come into contact with groundwater, and are not placed in a location where they could impact surface water. You must notify this office at least five business days before the spreading occurs.

You also requested concurrence with a proposal to use the decontamination water (currently stored on-site in a UN/DOT 55-gallon drum) for dust control. You presented no information characterizing the decontamination water. Without such information, I am unable to evaluate with your request and cannot concur with your proposal.

If you have any questions, please contact me at **cwoodhouse@waterboards.ca.gov** or at (707) 576-2701.

Sincerely,

Original signed by

Caryn Woodhouse
Staff Environmental Scientist

¹ CalEPA. 2005. *Human-Exposure-Based Screening Numbers Developed to Aid Estimation of Cleanup Costs for Contaminated Soil*. Office of Environmental Health Hazard Assessment. Found online at: <http://www.oehha.ca.gov/risk/pdf/screenreport010405.pdf>

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cc: Ms. Carmel Angelo, Director, Mendo Co Health and Human Services Agency,
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