



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

June 15, 2010

Mr. Stanley Hoffman  
Developers Diversified Realty  
455 East 500 South, Suite 300  
Salt Lake City, UT 84111

Dear Mr. Hoffman:

Subject: Area 9 Fuel Oil Investigation

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

Regional Water Board staff reviewed the April 28, 2010 *Workplan for Area 9 TPH Investigations* ("Workplan") for the former Masonite site in Ukiah submitted by Erler & Kalinowski, Inc. This Workplan focuses on the area of the former 1,000,000 gallon fuel oil above ground storage tank (AST), the former 225,500 gallon diesel AST, and the pipelines in Investigational Area 9. The Workplan was prepared in response to a May 11, 2009 letter from this office requesting that you submit a plan that would provide additional information about the extent of petroleum hydrocarbon contamination in Area 9.

In the May 11, 2009 letter, Regional Water Board staff stated that additional sampling to investigate the Area 9 contamination would be required – at least one sample every 20 linear feet along the transfer and unloading pipelines and from at least four locations around each tank. If contamination was discovered, step-out samples would be required. The Workplan proposes to drill and collect samples at 27 initial locations – 14 along the former transfer pipeline trench. The Workplan proposes to collect step-out samples when TPH impacts are noted. The presence of TPH impacts will be ascertained by visual observation and an organic vapor meter. The Workplan proposes to drill each sampling borehole to a depth of 3 to 5 feet below first encountered groundwater, which is expected to be found at about 15 feet below ground surface. The Workplan states that three soil samples will be collected from each borehole, and the samples *may* be submitted for laboratory analysis. The Workplan states that samples of any free-phase hydrocarbons that are discovered *may* be collected for laboratory analysis. The Workplan states that, if no free-phase hydrocarbons are seen in the

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groundwater, up to 16 groundwater samples *may* be collected, but it is not clear under what conditions the samples would be submitted to a laboratory for analysis.

The purpose of the Workplan is to address the vertical and lateral extent of contamination in Investigational Area 9. The number and location of the initial sampling points and the strategy for selecting step-out points should be sufficient to establish the area of contamination, but the Workplan does not provide assurance that the vertical extent of contamination will be defined. As explained in the May 11, 2009 letter, "At a minimum, samples need to be collected from just below the base of the former pipeline. If contamination is identified in the field at the shallow depths, then sufficient additional samples will need to be collected in order to define the vertical extent of contamination." The proposal to stop each borehole at five feet below first encountered groundwater, regardless of whether there is contamination at the bottom of the boring, is of concern. If there is contamination remaining at the bottom of the borehole, the vertical extent of contamination will not be determined. Additionally, the Workplan includes no criteria for submittal of samples to the analytical laboratory, which is needed in order to confirm field observations.

Regional Water Board staff will not concur with the Workplan unless the following changes are made:

1. Laboratory Analyses: Provide criteria for submittal of soil and groundwater samples to an analytical laboratory. At a minimum, include:
  - The soil sample from each borehole that shows evidence of the greatest contamination, unless there is no indication of contamination in a borehole.
  - At least one groundwater sample from each borehole with evidence of contamination in the saturated zone.
2. Depth of Borehole: Do not terminate a borehole at five feet below first encountered groundwater, unless there is no evidence of soil contamination at that point. Continue to investigate the borehole until you reach the depth at which there is no evidence of contamination. Obtain a verification sample to be submitted to an analytical laboratory to demonstrate that there is no contamination at the bottom of the borehole.

Please submit a revised workplan to include the items required in this letter. If you have any questions, please contact me at [cwoodhouse@waterboards.ca.gov](mailto:cwoodhouse@waterboards.ca.gov) or at (707) 576-2701.

Sincerely,

Original signed by

Caryn Woodhouse  
Staff Environmental Scientist

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