



**California Regional Water Quality Control Board  
North Coast Region  
Bob Anderson, Chairman**



**Linda S. Adams**  
Secretary for  
Environmental Protection

[www.waterboards.ca.gov/northcoast](http://www.waterboards.ca.gov/northcoast)  
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**Arnold  
Schwarzenegger**  
Governor

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

Mr. Dan Thomas  
Moreno & Company  
P.O. Box 1028  
Ukiah, CA 95482

Dear Messrs. Rabe, Richardson, Adams, and Thomas:

Subject: Confirmation Sampling of Masonite Property Pond Liners for Former  
Stormwater Ponds 10 and 11

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

Regional Water Board staff reviewed the October 8, 2009 SCS Engineers document titled *Liner Confirmation Sampling of Masonite Property Former Ponds 10 and 11, Kunzler Ranch Road, Ukiah, California* (Report), submitted for the Ukiah Masonite site.

The Report describes the results of the confirmation sampling for the liners for former stormwater Ponds 10 and 11. The sediments in those ponds had previously been removed to former stormwater Pond 9 for bioremediation as allowed under General Waste Discharge Requirements, Order No. 92-66. The liners for Ponds 10 and 11 were sampled in accordance with the *Report of Waste Discharge for Masonite Property Former Storm Water Ponds* dated August 15, 2008. Eight samples were taken from each pond – each sample consisting of four sub-samples from various depths that were composited. The samples were analyzed for total petroleum hydrocarbons (TPH) – diesel and motor oil range – and for polynuclear aromatic hydrocarbons (PNAs).

The analytical results show that no TPH contamination is present in the pond liners above the laboratory reporting limits of 5.0 mg/kg for diesel-range TPH and 50 mg/kg for motor oil-range TPH, using Method 8015M. The data that you have provided, along with the removal of the sediments from Ponds 10 and 11, allow us to agree that the investigation and remediation of the TPH contamination in Ponds 10 and 11 is complete. This conclusion is based on a review of the data submitted in the Report and assuming that the data reviewed are accurate and representative of conditions in the pond liners.

**California Environmental Protection Agency**

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The data regarding PNAs are not as clear. Since the liners may be left in place rather than being treated and removed to a permitted facility, the requirement to protect human health and the environment leads to the necessity for lower detection levels for PNAs. The analytical methodology used to screen for PNAs (Method 8015M) does not result in laboratory reporting levels that allow a meaningful comparison to human or ecological risk-based target concentrations for PNAs. Please reanalyze the samples using an appropriate laboratory method that would yield a lower reporting level.

Additionally, please ensure that the documents and reports that you submit to this office are uploaded to the Geotracker website in a timely manner. This is important for public access to the information. The October 8, 2009 document regarding the pond liner confirmation sampling is not on the website.

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

cc: Ms. Carmel Angelo, Director, Mendocino County Health and Human Services Agency, 1120 S. Dora St., Ukiah, CA 95482  
Mr. Phil Baldwin, Mayor, City of Ukiah, c/o City Clerk's Office, 300 Seminary Avenue, Ukiah, CA 95482  
Mr. James C. Camp, McKenna Long & Aldridge, 300 South Grand Ave, 14<sup>th</sup> Floor, Los Angeles, CA 90071-3124  
Mr. Mathew Clark, Masonite Corporation, 1 N Dale Mabry Hwy, Suite 950, Tampa, FL 33609  
Ms. Ellen Faulkner, PO Box 351, Redwood Valley, CA 95470  
Mr. Tyler Griffith, URS Corporation, Century Square, 1501 4th Avenue, Suite 1400, Seattle, WA 98101-1616  
Mr. Earl D. James, Erler & Kalinowski, Inc., 1870 Ogden Drive, Burlingame, CA 94010  
Mr. Stephen Knuttel, SCS Engineers, 3843 Brickway Blvd, Suite 208, Santa Rosa, CA 95403-8226  
Ms. Pinky Kushner, 504 N. Oak Street, #1, Ukiah, CA 95482  
Mr. Tom Mitchell, CEO, County of Mendocino, 501 Low Gap Road, Room 1010, Ukiah, CA 95482  
Mr. John Morely, Mendocino County Environmental Health Division, 501 Low Gap Rd, Room 1326, Ukiah, CA 95482  
Mr. Charles Sawyer and Mrs. Nancy Sawyer, 1305 Rafello Dr., Ukiah, CA 95482

**California Environmental Protection Agency**

Mr. Keith Uland, Lanahan & Reilley LLP, 600 Bicentennial Way, Suite 300, Santa Rosa, CA 95403

Via email:

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