



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



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Secretary for
Environmental Protection

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March 25, 2009

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

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

Dear Mr. Rabe and Mr. Richardson:

Subject: Further Comments on the Evaluation of Monitored Natural Attenuation

File: Masonite Corporation, 300 Ford Road, Ukiah, California
Case No. 1NMC042, 1TMC042

Regional Water Board staff has reviewed the July 13, 2007 SCS Engineers document *Response to NCRWQCB comments dated May 30, 2007 on Evaluation of Monitored Natural Attenuation for Masonite Corporation, 300 Ford Road, Ukiah, California* (Response). That document was in response to Regional Water Board staff's May 30, 2007 letter, which was in response to the SCS Engineers March 22, 2007 document *Results of the 1st Quarter 2007 Groundwater Monitoring and Sampling Event with Evaluation of Monitored Natural Attenuation* (Evaluation). Regional Water Board staff apologizes for our delay in responding and regrets any inconvenience this may have caused. Regional Water Board staff has the following comments on the Response:

- Concerning the Response sections labeled "NCRWQCB ITEM #1" and "NCRWQCB ITEM #6" and the responses to those items, the prior Regional Water Board staff comments regarding water quality objectives still stand. However, for PCE, groundwater analytical results of non-detect, using a reasonable reporting limit, would be sufficient. Regional Water Board staff considers 0.5 µg/l to be a reasonable reporting limit/practical quantitation limit for PCE. That reporting limit is regularly achieved by many of the analytical laboratories working on North Coast Regional Water Board sites.
- In the Response, estimated times for PCE and 1,1-DCA to reach water quality objectives were provided, along with a sample calculation. However, no reference or calculations were given for the assumed degradation constants, nor was a justification given for assuming first-order decay in this situation. Without sound

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technical justification for these assumptions, Regional Water Board staff would not consider those calculations in evaluating the need for further action.

- The Response section "SCS RESPONSE TO NCRWQCB ITEM #2" did not directly address the Regional Water Board staff technical comment, which regarded a potential flaw in one of the supporting arguments made in the Evaluation for evidence of reductive dechlorination. If that supporting argument is to be kept as part of the natural attenuation evaluation, the potential flaw will need to be directly addressed.
- In "SCS RESPONSE TO NCRWQCB ITEM #3", it was written that monitoring well MW-A13-08 was not included in the Evaluation's analysis of the degradation rate of 1,1,1-trichloroethane because that monitoring well "was screened in a different geologic unit." However, the presence of 1,1,1-trichloroethane in this deeper well at higher concentrations than in the deeper well MUF-A13-04, which is much closer to the source area, suggests the possibility that the groundwater water in MUF-A13-08 is in communication with the groundwater in the other monitoring wells used in the degradation evaluation.

It was also written in the Response that the concentrations of 1,1,1-trichloroethane in MUF-A03-06 are higher than those in MUF-A13-08, contrary to Regional Water Board staff's comment ("ITEM #3"). However, Regional Water Board staff's comment was based on just the February 13, 2007 monitoring data, when the concentration in MUF-A13-08 was higher, as the degradation evaluation was performed only on the February 13, 2007 data.

In "SCS RESPONSE TO NCRWQCB ITEM #3", it was also written that, for this situation, "it is very difficult to track any real trends or degradation from one point to another...". With the limited data set used in the 1,1,1-trichloroethane degradation evaluation, Regional Water Board staff concurs with the comment. For the 1,1,1-trichloroethane degradation evaluation to be used in the overall natural attenuation evaluation, the data set would need to be more substantial.

- Further comment or response regarding "NCRWQCB ITEM #4" is not needed.
- Regional Water Board staff had written in its May 30, 2007 letter "Only biological reductive dechlorination was considered in the natural attenuation evaluation. Natural attenuation can also include abiotic destruction of contaminants and non-destructive mechanisms for contaminant concentration reduction." In the Response's section on this item ("ITEM #5"), it was written that "Conclusively, the principle destructive mechanisms at work within Site wells, in our opinion, are biologically mediated anaerobic processes." Regional Water Board staff recommends that other processes that can contribute to natural attenuation not be discounted in the evaluation.

- A demonstration that all impacted groundwater will achieve water quality objectives in a reasonable period of time was not satisfactorily made in the Evaluation or the Response. It also appears that the additional groundwater monitoring that Regional Water Board staff requested in its May 30, 2007 letter has not been performed. Please resume chlorinated hydrocarbon monitoring, on at least a semiannual basis with monitoring performed in the first and third quarters. Considering that the first quarter is almost over, the next monitoring event should be completed by the end of April. The laboratory reporting limits for VOC analyses should not be greater than 0.5 µg/l. A Monitoring and Reporting Program order can be issued, if need be.

Regional Water Board staff did receive investigation reports for the Area 6 diesel investigation and the dioxin investigation. Those reports are under review.

In summary, you need to submit a groundwater monitoring report by June 1, 2009, for a groundwater sampling completed by the end of April, 2009. Section 13267 of the California Water Code contains the authority for this request.

If you have any questions or want to discuss this matter, you may reach me at (707) 570-3767 or at CHunt@waterboards.ca.gov.

Sincerely,



Craig Hunt
Water Resource Control Engineer

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