



Linda S. Adams
Secretary for
Environmental Protection

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

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Arnold
Schwarzenegger
Governor

August 25, 2009

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: Review of Workplan for PCB Investigation on Masonite Property

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

Regional Water Board staff reviewed the July 28, 2009 SCS Engineers *Workplan for PCB Investigation on Masonite Property* (Workplan) for the former Ukiah Masonite facility.

The Workplan explains that transformers containing polychlorinated biphenyls (PCBs) were removed from the property prior to 1999. New transformers, containing non-PCB mineral oil, were then installed. Sometime prior to July 10, 2007, the new transformers were vandalized, resulting in the release of transformer fluid. Due to the vandalism, possible PCB contamination was investigated around the area where transformers had been located and had been vandalized.

A water sample from a concrete sump where transformer oil had leaked was collected and found to be less than the laboratory detection limit of <3.0 µg/L for PCBs. Two wipe samples were obtained from a small pump house where it is believed that the vandalized transformers were dismantled. The results were less than the laboratory detection limits of <5.0 mg/L and <1.0 mg/L for PCBs. (Please note that the narrative in the Workplan describing these samples does not agree with the laboratory report.) A soil sample was obtained adjacent to the concrete pad where a pad-mounted transformer was located. The soil sample showed Aroclor-1248 at 9.6 mg/kg. Since

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the vandalized transformers did not contain PCBs, the Workplan concluded that this contamination is due to a release prior to 1999.

The Workplan proposes to collect soil samples at 12 locations around the concrete pad where the pad-mounted transformer was located in the area where the Aroclor-1248 was found. Five of the 12 locations would be soil borings to about 6.5 feet below ground surface (bgs). Seven of the 12 locations would be shallow soil samples to a depth of 1.5 feet bgs.

In addition to soil sampling, you will be required to sample groundwater as part of the PCB investigation unless all of the proposed soil sample results are below standard laboratory detections limits. In order to expedite the investigation, you may wish to obtain groundwater samples concurrent with the soil investigation phase of the Workplan. If PCBs are found in the proposed soil samples, you must work with the Regional Water Board staff to cleanup and abate the discharge.

With the understanding that groundwater samples may be required in addition to the soil samples, Regional Water Board staff concurs with the proposed activities in the Workplan. Please advise staff at least five days prior to the performance of field activities.

This concurrence is based on a review of the data submitted in the Workplan and assuming that the data reviewed are accurate and representative of site conditions. If you become aware of any other areas of PCB contamination that have not been addressed, or if on-going site activities indicate unanticipated PCB contamination, additional action may be required.

You will need to submit a report of investigation activities to our agency within 60 days of the completion of field activities and no later than December 15, 2009. Section 13267 of the California Water Code contains the authority for this request.

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

Sincerely,

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

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