



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



Linda S. Adams  
Secretary for  
Environmental Protection

www.waterboards.ca.gov/northcoast  
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403  
Phone: (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Arnold  
Schwarzenegger  
Governor

May 11, 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: Area 9 Fuel Oil Investigation

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

Regional Water Board staff reviewed the December 30, 2008 *Workplan for Area 9 TPH Investigations* ("Workplan") for the former Masonite site in Ukiah submitted by Eler & Kalinowski, Inc. The Workplan was prepared in response to an October 31, 2008 letter from this office requesting that you submit a plan that would provide additional information about the extent of fuel oil contamination in Area 9. Comments on the Workplan are detailed below. I apologize for the delay in reviewing the Workplan and regret any inconvenience that this delay has caused you.

The Workplan proposes to drill and collect samples at ten "initial" and 19 "step-out" locations along the pipeline trench and the two above ground fuel storage tanks to the north of Fuel Oil Tank #6. The two tanks to the north are a 1,000,000 gallon tank and a 225,000 gallon tank.

From the information presented in the Workplan, it appears that the former underground fuel oil conveyance piping trench between Fuel Oil Tank #6 and the 1,000,000 gallon tank is about 250 feet in length. The Workplan proposes three boring locations in the former pipeline trench. This is not sufficient to investigate this area. You need to sample every 20 linear feet of the former pipeline. At a minimum, samples need to be

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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. Additionally, step-out samples may need to be collected to define the lateral extent of contamination.

The five proposed initial locations to verify discharges from the 1,000,000 gallon and 225,000 gallon above ground storage tanks to the north of Tank #6 are not sufficient. At a minimum, you need to collect four samples uniformly distributed around each tank, with additional step-out samples if contamination is discovered. You also need to collect samples at 20 foot intervals along the unloading pipeline located near the two tanks.

Please submit an amendment to the Workplan to address these issues. California Water Code section 13267 contains the authority for this request. If you have any questions, please contact me at [cwoodhouse@waterboards.ca.gov](mailto:cwoodhouse@waterboards.ca.gov) or at 707-576-2701.

Sincerely,



Caryn Woodhouse  
Staff Environmental Scientist

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cc: Ms. Carmel Angelo, Director, Mendocino Co. Health and Human Services Agency, 1120 S. Dora Street, Ukiah, CA 95482  
Mr. Phil Baldwin, Mayor, City of Ukiah, c/o City Clerk's Office, 300 Seminary Avenue, Ukiah, CA 95482  
Mr. James Camp, McKenna, Long & Aldridge, 300 South Grand Avenue, 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, P.O. 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 Boulevard, 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 Moreley, Mendocino County Environmental Health Division, 501 Low Gap Road, Room 1326, Ukiah, CA 95482  
Mr. Charles Sawyer and Mrs. Nancy Sawyer, 1305 Rafello Drive, Ukiah, CA 95482

Mr. Dan Thomas, Moreno & Company, P.O. Box 748, Ukiah, CA 95482  
Mr. Keith Uland, Lanahan & Reilley LLP, 600 Bicentennial Way, Suite 300,  
Santa Rosa, CA 95403  
Ms. Meca Wawona, P. O. Box 206, Ukiah, CA 95482-0206

"Antonio Andrade" <asand@pacific.net>  
"Christina Aanestad" <christina@kzyx.org>  
"Cliff Paulin" <cliffpaulin@hotmail.com>  
"Gene Tienken" <gtienken@envirocon.com>  
"James Camp" <jcamp@mckennalong.com>  
"Jason Gray" <jason.gray@erm.com>  
"Jimmy Rickel" <jim.rickel@yahoo.com>  
mcaqmd@co.mendocino.ca.us  
"Rachel Howlett" <rach@sonic.net>  
"Richard Johnson" <richard@mendocinocountry.com>  
"Robert Perkey" <r.perkey@att.net>  
"Ronald K. Rinehart" <rkrinehart@comcast.net>  
"Roseanne Ibarra" <Roseanne.Ibarra@asm.ca.gov>  
"Ruth Valenzuela" <Ruth.Valenzuela@asm.ca.gov>  
"Sherry Glavich" <s\_glavich@pacbell.net>  
"Steve Scalmanini" <sscalmanini@yahoo.com>  
"Tony Shaw" <shawt@co.mendocino.ca.us>  
"UVSGC" <smartgrowthuk@yahoo.com>