

**Dale Stultz - 24 August 2010 Meeting Summary, Winemucca Trading Co.**

---

**From:** Dale Stultz  
**To:** Crandall, Robert; Johnston, Wendy; Johnston, Wendy L.; jscharff@scharff.us; ktraugh@scharff.us; Pulupa, Patrick; Wilson, Angela  
**Date:** 8/25/2010 9:59 AM  
**Subject:** 24 August 2010 Meeting Summary, Winemucca Trading Co.

---

To all,

Thanks for you time and constructive comments yesterday regarding cleanup of the Winemucca Trading Company's properties (former Shasta Paper Company Mill properties) in Anderson, California.

This message is provided to summarize action items from the meeting and emphasize compliance dates agreed to during our discussions.

Please note in Number 1 below, that my review of the 15 April 2008 Tank Inventory Report (checked after our meeting today) finds that white liquor is stored in **two tanks (Tank Nos. 42 and 56)**. I believe that Darryl Johnson has been treating the white liquor in Tank No. 56, but white liquor in Tank No. 42 should also be addressed at this time, which may also save money in the long run.

1. **By 27 August 2010**, provide a work plan proposing proper removal and disposal of white liquor wastes currently stored in aboveground storage tanks (ASTs) at the facility (Tank Nos. 42 & 56) and liquid waste currently stored in holding basin #3. The 15 April 2008 Tank Inventory Report indicates that white liquor is stored in Tank No. 42 and Tank No. 56 (white liquor clarifier). I believe that Darryl Johnson has been working with Tank No. 56. Please confirm tank numbers in the work plan. Provide MSDS for white liquor (Darryl has a copy). Characterize liquid waste in holding basin #3 and residual waste in the ASTs. Provide estimate of remaining waste volume in holding basin #3 and the ASTs. **By 31 October 2010**, complete white liquor waste removal from holding basin #3 and the ASTs. I suggest consolidating the white liquor wastes from both ASTs (Tank Nos. 42 and 56) to save costs of disposal. Have professional consultant certify clean closure of ASTs and holding basin #3 and contact RWQCB staff for inspection. **By 30 November 2010**, provide final clean closure report, including disposal receipts, shipping papers, and manifests for white liquor (similar to Black Liquor Tank Clean Closure Report).
2. **By 31 October 2010**, complete clean closure of holding basin #2 and properly dispose of all holding basin and clarifier wastes. Provide any new analytical data obtained during disposal process. Have professional consultant certify clean closure of holding basin #2 and contact RWQCB staff for inspection. **By 30 November 2010**, provide final clean closure report for holding basin #2 and a summary of all holding basin and clarifier waste disposal actions, including submittal of disposal receipts.
3. **By 27 August 2010**, provide proposal for removal of lime in Tank No. 40. **By 31 October 2010**, complete removal and clean closure of lime in Tank No. 40. Have professional consultant certify clean closure of Tank No. 40 and contact RWQCB staff for inspection.

**By 30 November 2010**, provide final clean closure report for lime stored in Tank No. 40.

4. **On 14 September 2010**, conduct technical consultation meeting to discuss concept of cleaning properties as Operable Units. VESTRA to provide draft 5-Year Work Plan using cleanup as Operable Units concept. Consider including schematic of facility with locations of all ASTs containing chemicals/wastes. If possible, bring working draft of trust agreement or at least an update on the status of the draft trust agreement. **NOTE**, Bob Crandall and Angela Wilson will not be available for this meeting.
5. **By 17 September 2010**, provide updated property title search report for all properties included in Cleanup and Abatement Order (CAO) No. R5-2004-0717 (and any others that may be impacted by former Shasta Paper Company operations that may not have been included in the original CAO). Include complete history regarding parcel transactions or transfers to other entities and list each corporation involved and the hierarchy and contact information of their corporate officers. List any parcel numbers that have changed or been dissolved since issuance of CAO No. R5-2004-0717. Provide parcel map(s) overlaid onto map of facility.
6. **By 15 October 2010**, provide final 5-Year Work Plan that addresses all remaining cleanup issues included in CAO No. R5-2004-0717 and any other investigation or cleanup issues that may be identified through a Phase II Site Investigation. The 5-Year Work Plan must include compliance dates for completing specific actions. Actions and compliance dates included with the 5-Year Work Plan will be incorporated into a new CAO.
7. **By 15 October 2010**, Jeff and Patrick to have final Trust Agreement (see Jamestown Agreement) for proceeds from any potential revenue generation associated with property sales, rents, or other arrangements. Possible development of MOU to capture these agreements. **NOTE: Jeff and Patrick, is this date reasonable for providing the final Trust Agreement?**

Please review the summary above and contact me with any comments or clarifications.

Please understand our need to have qualified professional oversight of the cleanup process in order for our agency to rescind enforcement orders and issue No Further Action letters. In regards to these concerns, please do not begin any new removal actions or treatments that have not already been reviewed and approved by RWQCB staff. As discussed during the 24 August 2010 meeting, failure to continue with necessary cleanup actions in accordance with compliance schedules will result in further enforcement and potential imposition of additional penalties.

Jeff, please forward this message to Mike Sommers, as I do not have his e-mail address.

Thanks,

Dale Stultz

Dale Stultz  
Regional Water Quality Control Board, Central Valley Region  
415 Knollcrest Drive, Suite 100  
Redding, CA 96002  
Office: (530) 224-4786

Fax: (530) 224-4857  
dstultz@waterboards.ca.gov