

California Regional Water Quality Control Board
North Coast Region

MONITORING AND REPORTING PROGRAM
Order No. R1-2007-0025

FOR

MENDOCINO FOREST PRODUCTS COMPANY, LLC
FORMER FORT BRAGG SAWMILL
32600 HOLQUIST LANE
FORT BRAGG, CALIFORNIA

Mendocino County

MONITORING

1. Groundwater Elevations

The depth to groundwater in each monitoring well shall be measured semiannually, during the first and third quarters (January-March and July-September, respectively) of the year, to at least 0.01 foot increments. The results of the semiannual elevations shall be reported in tabular form indicating the surveyed elevation of each well reference point, depth to groundwater from the reference point, and the actual groundwater elevation. The data generated from the elevation readings must be referenced to the same elevation datum used for the electronic GeoTracker survey values.

2. Private Well Sampling

The private water supply wells along the western boundary of the mill property (designated PW-1, PW-2, PW-3, PW-4, PW-5, PW-6, PW-7, and PW-9) shall be sampled semiannually, during the first and third quarters (January-March and July-September, respectively) of the year. The constituents to be analyzed for are TPH-g, TPH-d, 8260¹, and PCP/TCP.

Influent, post primary-filter, and post secondary-filter water samples shall be collected from the well-head treatment systems at every domestic well. The influent water samples shall be analyzed as specified in the table above. The post primary-filter water samples shall be analyzed if detectable levels of the constituents of concern are found in the influent water samples. The post secondary-filter water samples shall be analyzed if detectable levels of the constituents of concern are found in the post primary-filter water samples. The analyses shall be performed at a California State certified laboratory. Notification of analytical results shall be provided within 24 hours to the property owner, Mendocino County Health Department, and

¹ EPA Methods 8260, 524.2, or an equivalent GC/MS EPA Method may be used for the analysis of the groundwater. The analysis should be for all detectable parameters of the analysis method.

Regional Water Quality Control Board staff when detectable levels of any constituent of concern are found in influent or effluent samples at any domestic well.

3. Groundwater Monitoring

The groundwater monitoring well sampling program for the site is intended to verify that natural attenuation is occurring in the groundwater on the east side of the slurry wall and confirm that containment of contaminated groundwater is occurring. The program has contingencies for additional sampling if groundwater quality on the west side of the "Funnel and Gate" system is threatened. Accordingly, groundwater samples shall be collected and analyzed as follows:

a. East of Wall

<u>Well I.D.</u>	<u>Frequency²</u>	<u>Method³/Analytes</u>
MW-1	Annual	8260, gasoline
MW-2	Annual	8260
MW-6	Annual	8260, PCP/TCP, gasoline and diesel
MW-12	Annual	8260, PCP/TCP, diesel
MW-13	Biennial	8260, PCP/TCP
MW-14	Biennial	8260
MW-15	Biennial	8260
MW-18	Annual	8260, PCP/TCP, diesel

Annual and biennial sampling shall occur during the third quarter (July-September) of the year. The results of all analyses from the sampling of the above monitoring wells shall be evaluated in an annual report. Based on declining trends and supporting gradient data, changes in contaminant sampling frequency may be considered.

b. West of Wall

Sampling of monitoring wells MW-3, MW-4, MW-8, MW-9, MW-10, and MW-19 is suspended, unless the Executive Officer determines that a gate breach is threatened.

² The Executive Officer may require increased monitoring frequency if the groundwater flow pattern is changed indicating a gate breach is threatened and contaminants can by-pass the containment system. In addition, immediate sampling of MW-3, MW-4, MW-8, and MW-19 shall occur if any breach in the gate is detected by contaminants found in the out-gates.

³ The analysis by the listed method should be for all detectable parameters of the listed method.

c. Funnel and Gate Sentry Wells

Each upgradient, midgate, and downgradient sentry monitoring well at each of the four gates of the "Funnel and Gate" system shall be sampled semiannually, during the first and third quarters (January-March and July-September, respectively) of the year. The samples from the upgradient sentry monitoring wells (SW-1 In, SW-2 In, SW-3 In, SW-4 In) shall be analyzed. If a constituent of concern is detected above its detection limit in a sample from an upgradient sentry monitoring well, then the sample from the midgate sentry monitoring well (SW-1 Mid, SW-2 Mid, SW-3 Mid, SW-4 Mid) shall be analyzed for the same constituent. If a constituent of concern is detected at the midgate sampling point, the sample from the downgradient sentry monitoring well (SW-1 Out, SW-2 Out, SW-3 Out, SW-4 Out) shall be analyzed. If a constituent of concern is detected at the midgate sampling point, a plan for confirmation sampling and replacement of the carbon bed shall be submitted to the Executive Officer. Samples collected from the sentry monitoring wells at Gate 1 and 2 shall be analyzed for PCP/TCP, diesel, and all detectable parameters in an EPA Method 8260 analysis. Samples collected from the sentry monitoring wells at Gate 3 and 4 shall be analyzed for diesel and all detectable parameters in an EPA Method 8260 analysis.

4. Any newly installed groundwater monitoring well shall be sampled quarterly for at least one hydrologic cycle and analyzed for diesel, gasoline, all detectable parameters in an EPA Method 8260 analysis, pentachlorophenol and tetrachlorophenol.
5. All laboratory analyses shall be performed at a laboratory certified by the California Department of Health Services.

REPORTING

1. Monitoring reports, in paper form, shall be submitted to this office in accordance with the following schedule:

<u>Reporting Period</u>	<u>Due Date</u>
January, February, March	May 1
April, May, June	August 1
July, August, September	November 1
October, November, December	February 1

2. The monitoring reports and monitoring data shall also be submitted electronically to the State Water Resources Control Board's GeoTracker database as required by title 23, division 3, chapter 30 of the California Code of Regulations.

3. A groundwater elevation contour map shall be submitted for each monitoring well monitoring event. The facility layout, groundwater flow direction including groundwater gradient, and the locations of the wells shall be indicated on the map.
4. Each report shall contain copies of the well purging and sampling field logs; chain of custody documents showing the time and date of collection and person collecting; and signed laboratory sheets including quality control data and explanations of analytical anomalies, if any. These supporting documents may be included as appendices to the report.

5. Signatory Requirements

- a. All reports or information submitted to the Regional Water Board Executive Officer shall be signed by either a principal executive officer, ranking elected official, or a responsible corporate officer. For purposes of this provision, a responsible corporate officer means:
 - i. a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or
 - ii. the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- b. Reports and other information requested by the Regional Water Board may be signed by a duly authorized representative provided:
 - i. the authorization is made in writing by a person described in paragraph (a) of this provision;
 - ii. the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company; and
 - iii. the written authorization is submitted to the Regional Water Board prior to or together with any reports, information, or applications signed by the authorized representative.

- c. Any person signing a document under paragraph (a) or (b) of this provision shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Ordered by _____

Catherine E. Kuhlman
Executive Officer

June 14, 2007