

**California Regional Water Quality Control Board
North Coast Region**

Monitoring and Reporting Program Order No. R1-2018-0049

(Rescinds and Replaces Monitoring and Reporting Program No. R1-2013-0057)

For

International Paper Company

and

Diablo Commercial Properties

Former Masonite Wood Treatment Facility
Cloverdale

Case No. 1NS0266

Sonoma County

This Monitoring and Reporting Program Order is issued pursuant to California Water Code Section 13267(b) and requires monitoring of groundwater and submission of technical reports. The objective of monitoring conducted under this monitoring program is to provide the Discharger and the Regional Water Board with information concerning groundwater quality for the final remedy at the former Masonite Wood Treatment Facility located in Cloverdale, necessitated by the historic discharge of waste to the subsurface. The burden, including costs, of these reports bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.

This Monitoring and Reporting Program rescinds and replaces Monitoring and Reporting Program No. R1-2013-0057.

The failure to furnish any of the required reports, or the submittal of substantially incomplete reports or false information, is a misdemeanor, and may result in additional enforcement actions being taken against the Discharge, including issuance of an Administrative Civil Liability (ACL) Complaint pursuant to Water Code section 13268. Liability may be imposed pursuant to Water Code section 13268 in an amount not to exceed one thousand dollars (\$1,000) for each day in which the violation occurs.

Under the authority of California Water Code section 13267, the Discharger is required to comply with the following:

MONITORING

1. Prior to purging, the depth to groundwater shall be determined to at least 0.01-foot increments in the groundwater monitoring wells to be sampled during each sampling event.
2. Groundwater monitoring wells shall be sampled according to the schedule in Appendix 1 of this Monitoring and Reporting Program.
3. Each well shall be measured in the field (or by a certified laboratory, if appropriate) for parameters including dissolved oxygen, pH, groundwater temperature, oxidation-reduction potential, and specific conductance during purging activities, and sampling shall occur once parameter variance is within 5-10% difference.
4. The groundwater monitoring well samples shall be analyzed as specified Appendix 1 of this Monitoring and Reporting Program.
5. All laboratory analyses shall be performed at a California certified laboratory. Analytical methods for sample analyses shall achieve practical quantitation limits that are adequate for evaluating regulatory action levels for each constituent.

REPORTING

1. Annual monitoring reports shall be submitted to the Regional Water Board by January 30 of each year.
2. Monitoring data and reports shall be submitted to the Regional Water Board via the State Water Resources Control Board's Geographic Environmental Information Management System database (GeoTracker) as specified in Title 23, Division 3, Chapter 30, Article 2, Sections 3890-3895 of the California Code of Regulations.
3. Monitoring reports shall be prepared by or under the supervision of a California Professional Civil Engineer or Geologist.
4. The annual reports shall include the following elements:
 - a. A narrative description of the work conducted.
 - b. Interpretation of the data including a discussion on the effectiveness of the MNA remedy, and any proposed changes to the sampling program.
 - c. Field notes and/or sampling logs documenting such activities as well purging, aquifer parameter testing, and well recharge prior to sampling.
 - d. Chain-of-custody documentation.
 - e. Laboratory reports, including QA/QC data.

- f. An accurately scaled site plan showing all sampling points in relation to significant site features.
 - g. Post groundwater elevation on a site map.
 - h. Pentachlorophenol and breakdown product concentrations posted on site plan.
 - i. Data tables summarizing all historical analytical data for the site constituents of concern for each sampling station.
6. The results of the depth to groundwater measurements shall be reported in tabular form indicating the surveyed elevations of each 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 GeoTracker.

Ordered by _____

Matthias St. John
Executive Officer

September 7, 2018

Appendix 1

Well ID. (water-bearing zone type & screening interval)	Pentachlorophenol (U.S. EPA* Method 8151A)	Pentachlorophenol & other Chlorophenols¹ (U.S. EPA* Method 8151A)	Monitored Natural Attenuation Parameters²
Railroad Area Operable Units			
MW-12 – shallow (6-22 feet)	Semiannually, between October and December, and between April and June	Biennially (every second year) between April and June beginning in 2018	Biennially (every second year) between April and June beginning in 2018
Pond/LP Well Area Operable Units			
MW-27 – bedrock (80-90 feet)	Semiannually, between October and December, and between April and June	Biennially (every second year) between April and June beginning in 2018	Biennially (every second year) between April and June beginning in 2018
MW-37 – bedrock (77-87 feet)	Semiannually, between October and December, and between April and June	Biennially (every second year) between April and June beginning in 2018	Biennially (every second year) between April and June beginning in 2018

* United States Environmental Protection Agency

¹ 3,4-Dichlorophenol; 3,5-Dichlorophenol; 2,4,6-Trichlorophenol; 2,4,5-Trichlorophenol; 3,4,5-Trichlorophenol; 2,3,5,6-Tetrachlorophenol; and 2,3,4,5-Tetrachlorophenol.

² Nitrate, Nitrite, and Sulfate by EPA Method 9056; Sulfide, Standard Methods (SM) 4500S-F; Fe⁺² and Mn⁺² by EPA Method 7199 or equivalent IC method. Carbon Dioxide and Methane, AM20GAX; and Total Alkalinity, SM 2320B.