



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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December 8, 2020

Mr. David G. Massengill  
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OPERABLE UNIT E DRAFT REMEDIAL ACTION PLAN AND CONFIRMATION OF NO FURTHER ACTION FOR OPERABLE UNIT E SOIL AND PONDS 5 AND 9, FORMER GEORGIA-PACIFIC WOOD PRODUCTS FACILITY, FORT BRAGG, CALIFORNIA

Dear Mr. Massengill,

The Department of Toxic Substances Control (DTSC) has received the *Operable Unit - E (OU-E) draft Remedial Action Plan (RAP)* dated October 14, 2020. Although DTSC has initiated internal review of the RAP, DTSC will not begin the formal public review period until the City of Fort Bragg completes their draft Environmental Impact Report (EIR) for the Mill Pond Dam Repair Project scheduled for late 2021. Repair of Mill Pond Dam is a central element of the proposed containment remedial action for Pond 8 at the Former Mill Site. The City of Fort Bragg is the lead agency for implementing the California Environmental Quality Act (CEQA) for the project. As a Responsible Agency under CEQA, DTSC will provide input into the scope and preparation of the draft EIR and rely on a final EIR when considering approval of the OU-E RAP. DTSC will provide comments on the draft OU-E RAP next year (early 2021).

### **No Further Action for Ponds 5 and 9**

The draft OU-RAP recommends No Further Action (NFA) for the Pond 5 Area of Interest (AOI) and Pond 9 AOI. Sediment in Pond 5 and Pond 9 was evaluated in the Baseline Human Health and Ecological Risk Assessment (BHHERA). As described in the BHHERA, occasional adult recreator hazard indices (HIs) and excess lifetime cancer risks (ELCRs) for Pond 5 and Pond 9 are below 1 and  $1 \times 10^{-6}$  respectively, considering a 50 day per year exposure frequency. DTSC accepted this conclusion in the BHHERA when DTSC approved the BHHERA on August 20, 2015. As presented in the OU-E Feasibility Study (FS), dated September 12, 2019 (Section 2.2.6.2), Pond 5 AOI and Pond 9 AOI were not evaluated in the OU-E FS because the ELCRs for Pond 5 and

Pond 9 are below the risk management threshold of  $1 \times 10^{-6}$ . DTSC again agreed with this conclusion and approved the OU-E FS on October 24, 2019. DTSC agrees with the recommendation of NFA in the draft OU-E RAP for the Pond 5 AOI and Pond 9 AOI. Because of the anticipated extended schedule for the OU-E RAP and in support for possible redevelopment of the Former Mill Site, DTSC approves NFA for the Pond 5 and Pond 9 AOIs. The draft OU-E RAP can be amended to reflect this approval.

### **No Further Action for OU-E Soil**

As presented in the Removal Action Completion Report (RACR) dated March 12, 2018, residual contaminant of concern (COC) concentrations at the Riparian Area AOI are below the residential screening criteria at each confirmation sample point; therefore, NFA was recommended for the Riparian Area AOI in the RACR. The Lowland Terrestrial Area of Concern (AOC) includes several AOIs: Water Treatment and Truck Dump AOI, Powerhouse and Fuel Barn AOI, Sawmill #1 AOI, and the Compressor House and Lath Building AOI. The Exposure Point Concentrations (EPCs) for soil in the Lowland Terrestrial AOC meet residential screening criteria, and therefore, the Lowland Terrestrial AOC was also recommended for NFA for soil in the RACR. DTSC approved the RACR and NFA for OU-E Lowland Terrestrial Soil AOC and Riparian AOI on June 27, 2018. DTSC confirms that the OU-E Lowland Terrestrial AOC and Riparian AOI soil are approved for NFA.

Other OU-E AOIs previously approved for NFA for soil include Pond 8 Fill Area AOI, West of Interim Remedial Measure (IRM) AOI, and IRM AOI. DTSC approved NFA for Pond 8 Fill Area AOI on February 7, 2013 with the approval of the OU-E Remedial Investigation Report. DTSC approved NFA for West of IRM AOI and IRM AOI on April 12, 2011 with the approval of the Operable Units C and D Remedial Investigation Report.

NFA soil and sediment areas are shown on Figure 1-5 of the draft OU-E RAP. I hope this letter clarifies areas of OU-E approved for NFA by DTSC.

If you have any questions regarding this letter, please contact Tom Lanphar at [Tom.Lanphar@dtsc.ca.gov](mailto:Tom.Lanphar@dtsc.ca.gov).

Sincerely,



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cc: continued next page

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