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Memorandum

To: Tom Lanphar, DTSC **Project No.:** 242327

From: Glenn Young, Senior Project Manager

Subject: Draft Feasibility Study, Operable Unit E
dated May 19, 2017

Date: July 17, 2017

CC: Linda Ruffing & Marie Jones, City of Fort Bragg
Dave Massengill, Georgia Pacific
Jeremie Maehr, Kennedy/Jenks

On behalf of the City of Fort Bragg, TRC reviewed the Draft Feasibility Study (Draft FS), Operable Unit E report dated May 19, 2017 and provides the following comments.

General comments

Discussions throughout the report (Executive Summary, Introduction, Section 1.2.2, Section 2.1.6, etc) refer to Pond 8 as providing stormwater management for the City, making it appear that such is Pond 8's sole purpose. To be clear, Pond 8 was constructed by the mill operators to support mill operations. Stormwater was re-routed to Pond 8 as part of that construction. Please revise the text to clarify that, since mill operations are now shuttered, Pond 8 is currently used to provide stormwater management for the southern portion of the Mill Site as well as a portion of the City.

Implementation of the Remedial Action Workplan (RAW) dated October 2016 for the Southern Ponds will reduce the calculated excess cancer risk, the Southern Ponds will likely be subject to a Land Use Covenant (LUC). Accordingly, the Draft Feasibility Study (Draft FS) should include remediation to an unrestricted land use as part of the Evaluation of Remedial Alternatives. Such an evaluation was not presented in either the RAW or this Draft FS.

For Pond 8, the Draft FS should include filling Pond 8 and establishing a seasonal wetland as a remedial alternative. Additionally, the City requests a more detailed description and evaluation of the vegetated soil cover alternative for Pond 8. The vegetated soil cover alternative should include covering the Pond 8 sediment, redesigning Pond 8 to use as a wetland for surface stormwater management, revegetating the sediment cover, re-routing the flow of Maple Creek to avoid the Mill Pond in its entirety, and daylighting the Maple Creek flow from the Maple Street wetland through the lowland to the beach berm. This alternative should also: 1) consider the reuse of soil from the daylighting effort as sediment cover for Pond 8 in order to reduce soil transportation and disposal costs; and 2) consider the cost savings of no longer needing to undertake dam stabilization.

Specific comments

1. Section 1 Introduction, 3rd paragraph, 5th sentence – This sentence is not correct. Please correct as follows: *The City acquired and improved an 82 acres of land known as Noyo Headlands Park, which extends over the northern and southern coastal bluff at the former mill Site. The project includes 5.4 miles of trails and various other improvements.*
2. Section 1 Introduction, 4th paragraph indicates that “soil was placed in portions of the terrestrial areas to cover foundation in the lowland following building demolition and interim cleanup activities in those areas.” We recommend including an illustration showing the locations of these capped areas in the attached Figures. These should also be referenced in Section 2.2.3 – Interim Remedial Measures. We also recommend illustrating the locations of the remaining concrete slabs, tanks, or other industrial features currently present at the Site as well as the extent of the Pond 8 Fill Area.
3. Section 1 Introduction, 4th paragraph – Insert the following before the last sentence: *However, the Coastal Trail will soon be installed through a portion of OUE. The trail alignment will be separated from the Mill Site with property line fencing that will be appropriately marked with warning signs.*
4. Section 1 Introduction, 4th paragraph – Add the following to the end of this paragraph: *Some commercial land use may occur in Parcel 5, depending on how the planning process proceeds.*
5. Section 1.2.1.3, 6th paragraph – In addition to the presence of the wetland feature, the concrete foundation was not removed due to slope stability concerns at that time.
6. Section 2.1.1, Land Use – After the 5th sentence insert the following: *The trail will be connected through the OUE in 2017. The trail will be constructed in an area for which DTSC issued a comfort letter. Upon completion, the trail corridor will be fenced to exclude trespassing onto the remainder of the Site.*
7. Section 2.1.5.3, Groundwater Use – The second sentence should be revised to indicate that groundwater use in OU-E may promote salinity and the potential to cause saltwater intrusion. Please add the following at the end of the paragraph: *Additionally, the City of Fort Bragg only allows the use of groundwater for non-potable landscaping.*
8. Section 2.2.6.1, Lowland Terrestrial AOC Risk Assessment – Please reference/discussion for all of the lead Removal Areas illustrated on Figure 2-27. Please include a Figure for the OUE-DP-025 hydrocarbon hotspot.
9. Section 2.2.6.2, Aquatic AOC Risk Assessment – Referring to the “under” 50-day exposure frequency can be confusing. Please replace “under” with “using” or “for”. Strike the last sentence of the penultimate paragraph in this Section.
10. Section 2.3.2.1, Ponds 1 through 4 (Southern Ponds) – Please indicate whether a Land Use Covenant is planned or likely, and whether that will impact ecological restoration and maintenance activities for Ponds and Riparian Areas discussed in this section.
11. Section 4.1.3.3, Area for Remedial Alternative Development – Strike “It is assumed that” from the beginning of the 2nd paragraph.
12. Section 4.2.2.2, Area Exceeding Remedial Goals – What is the relevance of the fifth sentence of the 1st paragraph? Recommend striking the second half of this sentence.
13. Section 5.2.2.2, Detailed Screening of Sediment Process Options – The text should indicate that ISM is retained for further evaluation.

14. Section 5.2.3, Description of Selected Process Options – As noted in the Cost Summary Table in Appendix A, please indicate that modifications to the Mill Pond Dam are being evaluated but are not included as part of this Draft FS. Additionally, statements describing relative costs should be presented for each process option.
15. Appendix A, Cost Summary Table for Groundwater Remedial Alternatives -
 - a. The Monitored Natural Attenuation alternative should include 6 events rather than 5.
 - b. The \$500k allocated for Design, Permitting, and System Installation under both the Soil Vapor Extraction (SVE) and Groundwater Extraction and Treatment alternatives is excessive as is the assumed operation of these systems for 30 years.
 - c. Please provide a description of the restoration activities assumed for the Pond AOCs, and the rationale for including \$4.37 million for creek restoration as part of the remedial alternatives presented for the Pond 8 AOC in the Sediment Remediation Alternatives. It is unclear how the 19 acres allocated for restoration was derived or envisioned for this Alternative.
 - d. Footnote 2 should apply to all Pond 8 AOC remediation alternatives.