APPENDIX A

TRC'S WORKPLAN AND RWQCB APPROVAL LETTER

June 23, 2004

Mr. Craig Hunt
California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard
Santa Rosa, California 95403

Workplan for Additional Site Assessment
Georgia Pacific Former Sawmill
90 West Redwood Avenue, Fort Bragg, California

Dear Mr. Hunt:

On behalf of Georgia Pacific Corporation (G-P), TRC submits this workplan for additional assessment activities for the former G-P Fort Bragg Facility located at 90 West Redwood Avenue in Fort Bragg, California (Site), Figure 1. This workplan has been prepared pursuant to recommendations for follow up assessments presented in TRC's *Phase I Environmental Site Assessment*, dated March 2004 (Phase I Report), and *Phase II Environmental Site Assessment,* dated May 14, 2004 (Phase II Report).

The Phase I Report identified several areas of concern that could not be investigated during the Phase II activities due to active operational areas, and power lines. These areas will need to be further evaluated to ensure that there are no impacts to soil and groundwater as a result of past operations. The Phase II Report identified soils impacts with total petroleum hydrocarbons as diesel (TPH-D). Additional assessment has to be performed to identify whether these levels are a potential source of impacts to groundwater. Additionally, the Phase II Report identified elevated concentrations of tebuthiuron and atrazine in grab groundwater from Parcel 9. Further assessment in Parcel 9 needs to be performed to determine potential soil impacts.

In order to complete the Site characterization process, TRC proposes to complete potholes and collect surface soil samples. Potholes will be placed at several locations on the Site in order to assess subsurface anomalies and for the further evaluation of elevated hydrocarbon concentrations detected during previous Site assessment activities. However, in areas identified as containing elevated hydrocarbon concentrations limited to shallow soils, TRC proposes to collect surface soil samples.

1590 Solano Way, Suite A • Concord, California 94520
Telephone 925-688-1200 • Fax 925-688-0388

Select soil samples collected from Parcels 3 through 8 will be analyzed for TPH-D according to the Toxicity Characteristic Leaching Procedure (TCLP) using de-ionized water. This analysis will be used to determine the leaching potential of diesel and it's potential impacts to groundwater. In addition, a duplicate sample from the same location will be analyzed for TPH-D using the silica gel cleanup method (SGCU). The purpose of the SGCU method is to remove non-fuel hydrocarbons, including anthropogenic and naturally occurring organic compounds, from the sample and therefore prevents them from being falsely quantified as diesel.

In addition, Soil samples will be collected from below the floor slab of the Power House. These soil samples will be collected using hand augers, once the concrete floor has been cut.

Select soil samples collected from Parcel 9 will be analyzed for tebuthiuron and atrazine.

1.0 SCOPE OF WORK

The proposed scope of work for this phase of work at the Site involves the following:

- Completion of 14 potholes for the purpose of collecting soil samples from selected Site locations in Parcels 3, and 5 through 9
- Collect 4 surface soil samples at selected Site locations in Parcels 3 and 7.
- Upon the completion of demolition activities in Parcel 4, advance approximately four borings under the foundation of the Power House for the purpose of collecting soil samples and complete the assessment process in this area.
- Investigate subsurface anomaly near the Power House, identified during Phase II geophysical activities, through advancing a single pothole.
- Advance approximately two potholes for the purpose of investigating soils and subsurface anomalies in the Former Bunker Fuel AST Area now that the power lines have been inactivated.

2.0 FOLLOW UP ASSESSMENT ACTIVITIES

2.1 Potholing Activities

As indicated previously, location of the proposed potholes are based on Phase I recommendations, previous Phase II findings, and/or subsurface anomalies detected during Phase II geophysical activities. Fourteen potholes will be completed using a backhoe, to approximately 10 feet below grade (fbg) or until groundwater is encountered. The potholes will be completed at select locations in Parcels 3, 4, 5, 6, 7, and 8. Additional potholes will be installed if further delineation in these areas becomes necessary. All proposed pothole locations are presented in the enclosed Figure 2.

The lithology of the soil in each pothole will be described in accordance with the Unified Soil Classification System (ASTM D-2487). Soil samples will be collected from excavated soils at each pothole. Each soil sample will be screened onsite with a portable photoionization detector (PID). A minimum of two soil samples per pothole will be submitted to a State-certified laboratory for analysis, under appropriate chain-of-custody protocol.

After sampling is completed, all trenches will be backfilled with the excavated soils.

2.2 Soil Sampling

As indicated previously, proposed soil sampling locations are based on elevated hydrocarbon concentrations limited to shallow soils, areas with potential pesticides impacts, and areas within the Power House. Soil samples will be collected in eleven locations using a hand auger. The samples will be collected from select locations in Parcels 3, 4, 7 and 9 (Figure 2).

2.3 Laboratory Testing Program

Curtis and Tompkins Ltd. of Berkeley, California, a state-certified laboratory, will perform the following analyses for select soil samples collected from Parcels 3 through 8:

- Total petroleum hydrocarbons as diesel with silica gel cleanup (TPH-D w/SGCU) (EPA Method 8015 Modified) – Extended Chromatogram.
- Toxicity Characteristic Leaching Procedure by deionized water for TPH-D (TCLP – DI for TPH-D) (EPA Method 1311)

For the soil samples collected within the Power House, the following analysis will be performed for selected soil samples:

- Total petroleum hydrocarbons as diesel with silica gel cleanup (TPH-D w/SGCU) (EPA Method 8015 Modified) – Extended Chromatogram.
- Volatile Organic Compounds (VOCs) (EPA Method 8260) sample collection via EPA Method 5035)
- PCBs (EPA Method 8080)
- Semi-Volatile Organic Compounds (EPA Test Method 8270)
- CAM-17 Metals

For selected samples collected from Parcel 9, North Coast Laboratories of Arcata, California, a state-certified laboratory, will perform the tebuthiuron and atrazine analyses (no EPA methods).

2.4 Survey

Sampling and pothole locations will be surveyed by a licensed land surveyor.

2.5 Follow Up Assessment Report

Upon the completion of follow-up assessment activities, a final report will be prepared which will include pothole logs, laboratory analytical results, survey data, findings, and conclusions.

2.6 Schedule

TRC is scheduled to commence the activities outlined in the Workplan on July 19th 2004, and upon approval by the Regional Water Quality Control Board.

Please call if you have any question or comments.

Sincerely,
TRC

Mohammad Bazargani, P.E.
Senior Associate

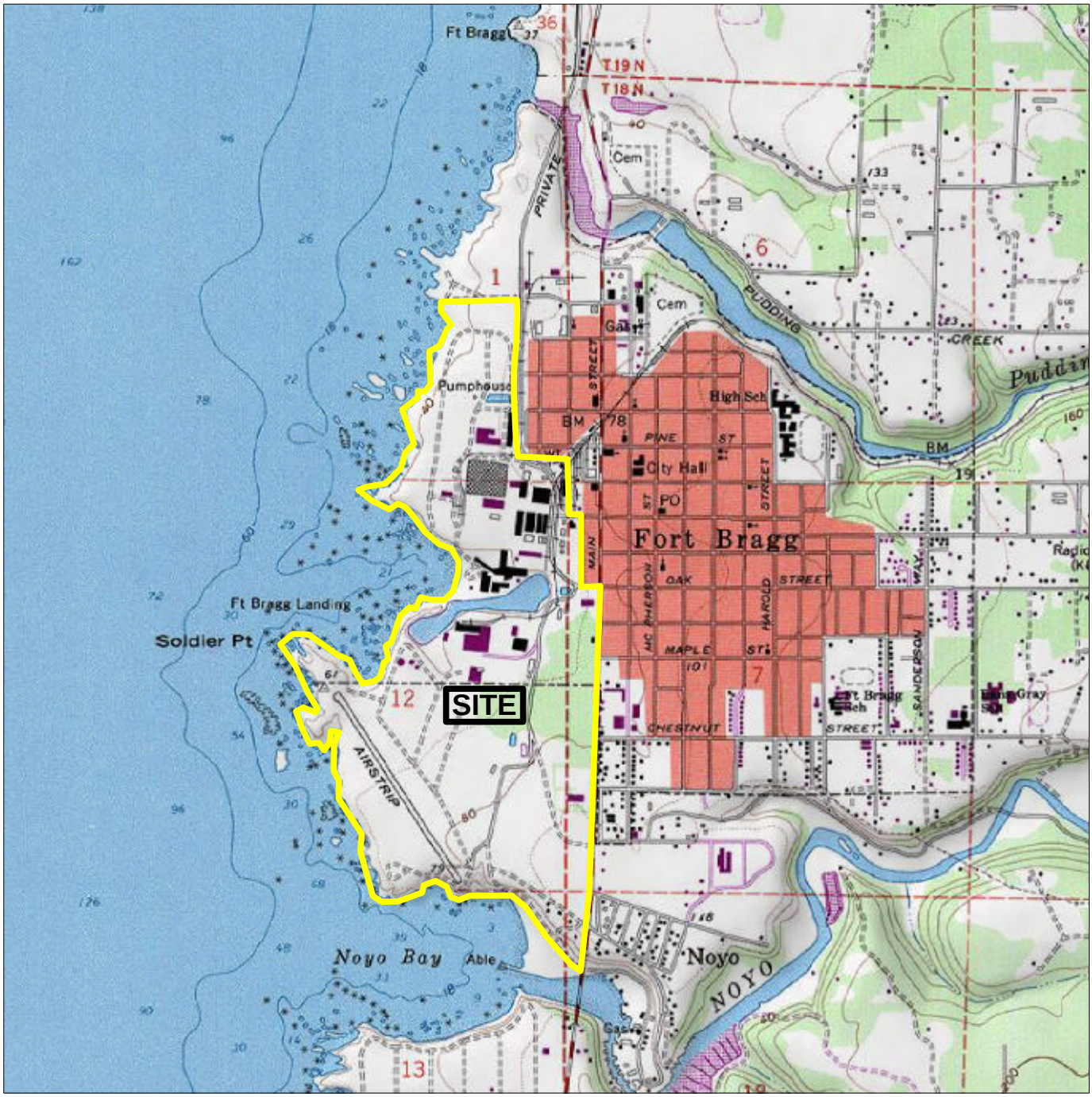
for Steve Kemnitz
Project Scientist

Enclosure

cc: Ms. Julie Raming, Georgia Pacific Corporation
Ms. Linda Ruffing, City of Fort Bragg, Department of Community Development

ATTACHMENT

FIGURES 1 & 2



APPROXIMATE SCALE (FEET)

0 2,000 4,000

LEGEND

Approximate site boundary

N

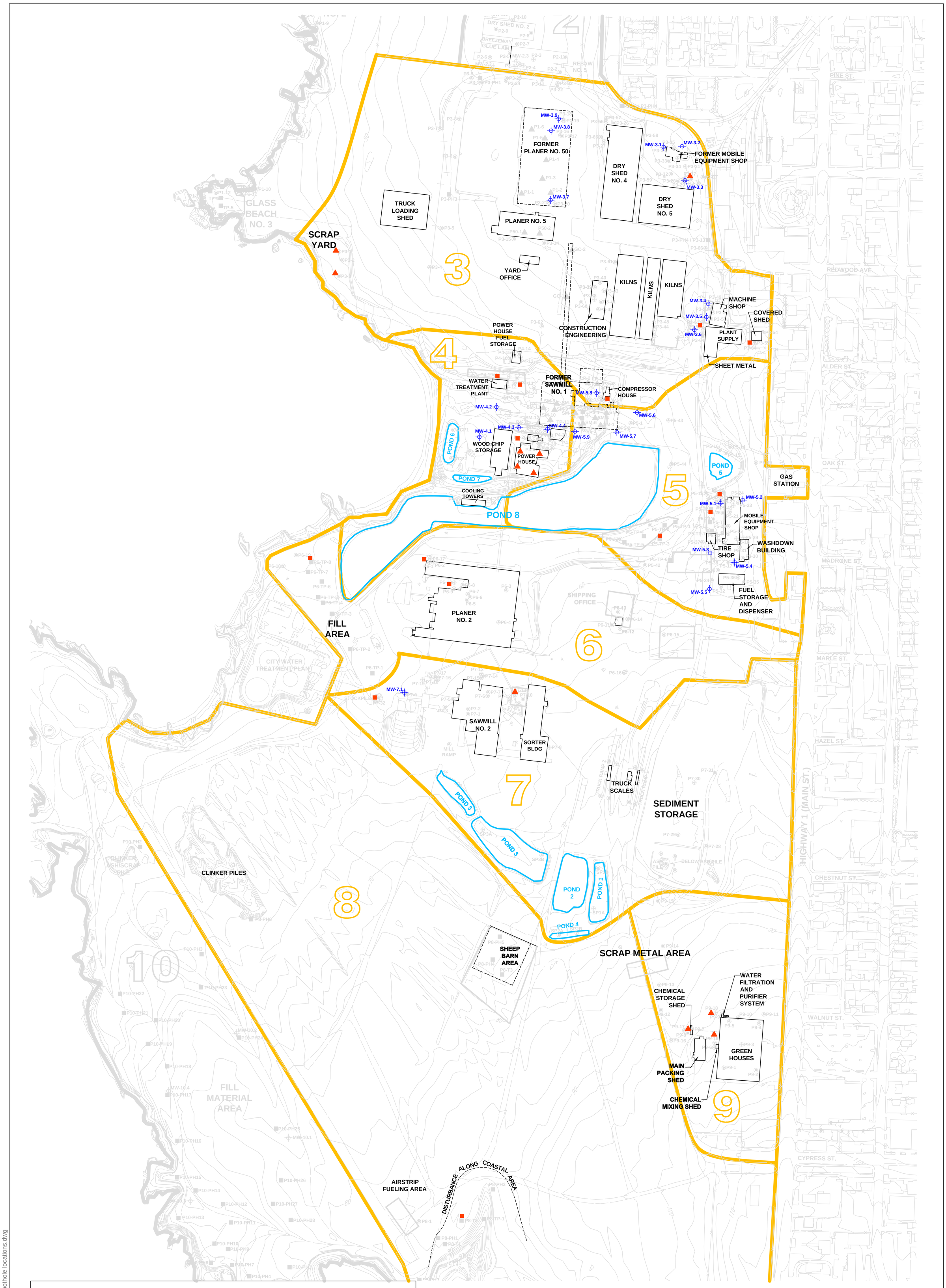
SOURCE:
National Geographic
USGS Topographic Maps on CD–ROM:
Fort Bragg Quadrangle

VICINITY MAP

Georgia-Pacific
California Wood Products
Manufacturing Division
90 West Redwood Avenue
Fort Bragg, California

TRC

FIGURE 1


SCRAP YARD
TRUCK LOADING SHED
FORMER PLANER NO. 50
DRY SHED NO. 4
DRY SHED NO. 5
FORMER MOBILE EQUIPMENT SHOP
PLANER NO. 5
YARD OFFICE
KILNS
KILNS
KILNS
CONSTRUCTION ENGINEERING
MACHINE SHOP
COVERED SHED
PLANT SUPPLY
SHEET METAL
POWER HOUSE FUEL STORAGE
WATER TREATMENT PLANT
FORMER SAWMILL NO. 1
COMPRESSOR HOUSE
WOOD CHIP STORAGE
POWER HOUSE
POND 6
POND 7
COOLING TOWERS
POND 8
POND 5
GAS STATION
MOBILE EQUIPMENT SHOP
TIRE SHOP
WASHDOWN BUILDING
FUEL STORAGE AND DISPENSER
PLANER NO. 2
FILL AREA
SAWMILL NO. 2
SORTER BLDG
TRUCK SCALES
SEDIMENT STORAGE
POND 3
POND 3
POND 2
POND 1
POND 4
CLINKER PILES
SHEEP BARN AREA
SCRAP METAL AREA
CHEMICAL STORAGE SHED
WATER FILTRATION AND PURIFIER SYSTEM
GREEN HOUSES
MAIN PACKING SHED
CHEMICAL MIXING SHED
AIRSTRIP FUELING AREA
DISTURBANCE ALONG COASTAL AREA
GLASS BEACH NO. 3
CITY WATER TREATMENT PLANT
FILL MATERIAL AREA
HIGHWAY 1 (MAIN ST.)
REDWOOD AVE.
ALDER ST.
OAK ST.
MADRONE ST.
MAPLE ST.
HAZEL ST.
CHESTNUT ST.
WALNUT ST.
CYPRESS ST.
PINE ST.
3
4
5
6
7
8
9
10
LEGEND
Sampling Location*
Pothole*
Monitoring Well
TRC Soil Investigation, 1998*
Geophysical Investigation Area
Proposed Pothole Location
Proposed Surface Sampling / Hand Augering Location
* Not all sampling locations are surveyed.
N
GRAPHICAL SCALE (FEET)
0
200
400
600
800
PROPOSED POTHOLE AND SURFACE SAMPLING LOCATIONS
Georgia-Pacific
California Wood Products
Manufacturing Division
90 West Redwood Avenue
Fort Bragg, California
TRC
FIGURE 2
...\fort bragg\prop potholes_jun-july04\fig_proposed pothole locations.dwg

California Regional Water Quality Control Board
North Coast Region

William R. Massey, Chairman

Terry Tamminen
Secretary for Environmental Protection

http://www.swrcb.ca.gov/rwqcb1/
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
Phone 1-877-721-9203 Office (707) 576-2220 FAX (707) 523-0135

Arnold Schwarzenegger
Governor

July 15, 2004

Ms. Julie B. Raming
Georgia-Pacific Corporation
P.O. Box 105605
Atlanta, GA 30348-5605

Dear Ms. Raming:

Subject: Workplan for Additional Site Assessment

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg
Case No. 1NMC462

Thank you for the June 23, 2004 *Workplan for Additional Site Assessment* and the subsequent revised workplan (Workplan) from TRC for this site. As we discussed in our telephone conversation July 13, 2004, I do agree that this proposed work can provide additional useful information. However, since I have not finished my review of the *Phase II Environmental Site Assessment Report* and related material, additional investigation may be necessary in the future. You may proceed with performing the work proposed in the Workplan, with one technical modification:

- Please report the full range for the total extractable petroleum hydrocarbons analyses, not just the diesel range results.

I understand that this work will be performed on July 20 and July 21, 2004. Please submit a report of field findings within 60 days of completing the field work. This includes submittal of the analytical results to the state's GeoTracker database.

If you have any questions or comments, you may contact me at huntc@rb1.swrcb.ca.gov or (707) 570-3767.

Sincerely,

ORIGINAL SIGNED BY

Craig Hunt
Water Resource Control Engineer

CSH:tmk\071504_CSH_GPFB0407WorkplanResponse

cc: Mr. Mohammad R. Bazargani, TRC, 1590 Solano Way, Suite A, Concord, CA 94520-5317
Mr. Doug Heitmeyer, Georgia-Pacific Corporation, 90 West Redwood Avenue, Fort Bragg, CA 95437
Mendocino County Health Department, 501 Low Gap Road, Room 1326, Ukiah, CA 95482
Ms. Linda Ruffing, Community Development Department, City of Fort Bragg, 416 N. Franklin Street, Fort Bragg, CA 95437
Mr. Dave Goble, Public Works Department, 416 N. Franklin Street, Fort Bragg, CA 95437
Mr. Andy Whiteman, City Manager, 416 N. Franklin Street, Fort Bragg, CA 95437
Ms. Loie Rosenkrantz, 17201 Franklin Road, Fort Bragg, CA 95437
Mr. David L. Berry, Department of Toxic Substances Control, P.O. Box 806, Sacramento, CA 95812
Ms. Ashle Crocker, Remy, Thomas, Moose, and Manley, 455 Capitol Mall, Suite 210, Sacramento, CA 95814
e-mail cc list