

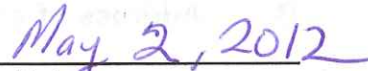
**REMEDIAL ACTION CERTIFICATION
OPERABLE UNIT – A, GEORGIA-PACIFIC
Fort Bragg, Mendocino County**

1. Certification of Remedial Action:


I hereby certify that the following information is true and correct to the best of my knowledge.




Project Manager, Thomas Lanphar
Brownfields and Environmental Restoration Program



Date



Unit Chief, Denise Tsuji
Brownfields and Environmental Restoration Program



Date

2. Certification Statement: Based upon the information which is currently and actually known to DTSC,

DTSC has determined that all appropriate response actions have been completed, that all acceptable engineering practices were implemented and that no further removal/remedial action is necessary.

DTSC has determined, based upon a remedial investigation or site characterization, that the site poses no significant threat to public health, welfare, or the environment and therefore implementation of removal/remedial measures is not necessary.

DTSC has determined that all appropriate removal/remedial actions have been completed and that all acceptable engineering practices were implemented: however, the site requires ongoing operation and maintenance (O&M) and monitoring efforts. The site will be deleted from the "active" site list following (1) a trial operation and maintenance period and (2) execution of a formal written settlement between DTSC and the responsible parties, if appropriate. However, the site will be placed on DTSC's list of sites undergoing O&M to ensure proper monitoring of long-term clean-up efforts.

3. Site Name and Location: (Street address, County, and City)

Georgia-Pacific Former Wood Products Facility, Operable Unit A
90 Redwood Avenue
Fort Bragg, Mendocino, California

A. List any other names that have been used to identify this site:

Georgia-Pacific; Coastal Trail and Parkland Zone; Consolidation Cell

B. Address of site if different from above: N/A

**C. Assessor's Parcel Numbers: 008-020-09, 008-010-26, 018-430-01,
018-430-02**

4. Responsible Parties:

Georgia-Pacific LLC
133 Peachtree Street, NE
P.O. Box 105605
Atlanta, Georgia 30348-5605
Attn: Mr. David G. Massengill, Senior Director
DGMassen@gapac.com

Relationship to Site: Previous owner of property in Operable Unit A (OU A).
OU A is now owned by the City of Fort Bragg

5. Brief Description and History of the Site:

Operable Unit A is one of five operable units of the former Georgia-Pacific mill site. Located along the Pacific Ocean, OU-A is divided into two sections; one north and one south of Soldier Bay (now called Fort Bragg Landing).

Soil removals took place at several locations during the summer of 2009 within two general areas of Operable Unit A, with one general area located in the southern section and the other in the northern section. The remediation of soil in these two areas meets recreational levels and therefore, future land use of these areas, intended for the coastal trail, is restricted to recreational uses by the Operable Unit A Land Use Covenant (LUC). The LUC between Georgia-Pacific and DTSC was recorded with the County of Mendocino on December 10, 2009. The remaining land in Operable Unit A does not require remediation and DTSC has not required any restrictions on future land use.

Approximately 13,000 cubic yards (cy) of dioxin contaminated soil from the five areas was excavated to depths ranging from 2 to 5 feet below ground surface (bgs) and

placed into the 1.5 acre Consolidation Cell located in Operable Unit D of the Georgia-Pacific mill site. Approximately 140 cy of lead contaminated soil was excavated at the Lead Presumptive Remedy Area (PRA) in OU-A North to a depth of approximately 2 feet bgs and removed for offsite disposal. At the Former Scrap Yard area within OU-A North, approximately 990 cy of soil was excavated to a depth of approximately 1 foot bgs.

DTSC approved the OU-A Completion Report on December 9, 2009 and provided partial certification of the Remedial Action. Partial Certification was granted because, although constructed, all remedial actions required to certify the completion of the Consolidation Cell were not completed at that time. An Operation and Maintenance Agreement and a Land Use Covenant for the Consolidation Cell had not been finalized. However, prior to finalizing these documents, excessive amounts of water accumulated in the Consolidation Cell during the winter of 2009/2010 and again in 2010/2011 indicting a failure of the Consolidation Cell cover or drainage system. Georgia-Pacific reconstructed drainage ditches surrounding the Consolidation cell in 2010; however, water continued infiltrating into the Consolidation Cell. Georgia-Pacific submitted, on April 13, 2011, the Consolidation Cell Investigation Conclusions and Phase II Enhancements Plan. Phase II enhancements involved constructing a new cover over the existing cover on the Consolidation Cell. Georgia-Pacific informed DTSC in May 2011 of their intention to remove the Consolidation Cell. The Phase II Enhancement Plan was never approved by DTSC.

Georgia-Pacific submitted a work plan for the Consolidation Cell Removal on June 15, 2011. DTSC approved the work plan, issued an Explanation of Significant Differences and completed a California Environmental Quality Act (CEQA) Initial Study and Negative Declaration on August 31, 2011.

Excavation and removal of the Consolidation Cell was completed on November 8, 2011. About 14,700 cubic yards of both OU-A impacted material and non-OU-A soil was excavated and loaded into trucks for off-site disposal at the Hay Road landfill in Solano County, California (893 total truck trips with an estimated 16 to 17 cubic yards loaded per truck). When direct loading was not possible, material was temporarily stockpiled for subsequent loading and disposal.

The cell was backfilled using material from an onsite stockpile, previously removed cover soil, and about 500 cubic yards of 2,500 cubic yards of soil originally placed under the cover and above the OU-A contaminated soil. This soil was tested and found acceptable for reuse. The excavated area was restored to re-establish pre-cell conditions to the extent possible, tie in to existing surrounding grade, and promote positive drainage and stable conditions. The site was hydro-seeded with native grass and forb species, and a low nitrogen fertilizer and fiber mulch were applied. DTSC approved the March 2012 Consolidation Cell Removal Report on April 11, 2012.

A list of milestone documents and their DTSC approval date is located in Section 11.B.

6. **Type of Site:**

Is the Site included in the Bond Expenditure Plan?

Yes ___ No X

RCRA-Permitted Facility ___ Bond-funded ___
RCRA Facility Closure ___ RP-Funded X
NPL ___ Federal Facility ___
Other (i.e. walk-in) ___ Explain Briefly:

7. **Size of the Site:**

Small ___ Medium ___ Large X Extra-Large ___

8. **Dates of Remedial Action:**

a. Initiated: May 2009 b. Completed: November 2012

9. **Response Action Taken on Site: (check appropriate action)**

- X Remedial Action (satisfactory abatement of site)
- ___ Final Removal Action
- ___ RCRA enforcement/closure action
- ___ No action, further investigation verified that no clean-up action at the site was need.

A. Type of Remedial or Removal Action: (e.g. excavation and disposal, on-site treatment, etc.)

The remedial action involved excavation dioxin, lead and PCB contaminated soil from OU-A. Lead and PCB contaminated soil was excavated and disposed off-site. Dioxin contaminated soil was originally disposed of in an on-site Consolidation Cell. The Consolidation Cell, and all contaminated material was removed in the fall of 2011. All dioxin contaminated material was transported and disposed of at the Class II non-hazardous waste Hay Road Landfill in Solano County, California Class II non-hazardous waste landfill.

B. Estimated quantity of waste associated with the site (i.e., tons/gallons/cubic yards) which was:

treated amount:
 untreated (capped sites) amount:
 removed amount: 16,000 cubic yards

10. Cleanup Levels/Standards:

- a. What were the cleanup standards established by DTSC pursuant to the Final Remedial Action Plan (RAP) or workplan (if cleanup occurred as the result of removal action (RA) prior to development of a RAP)?

Soil cleanup goals:

Dioxin: 53 parts per trillion (ppt) or picograms/gram (pg/g) Toxic Equivalent (TEQ).

Lead: 80 mg/kg

PCB: 1 mg/kg

- b. Were the specified cleanup standards met? yes no

- c. If "no", why not

11. DTSC Involvement in the Removal Action:

A. Did DTSC order the Removal Action?

Yes No Date of Order: February 16, 2007

B. Did DTSC review and approve the following plans/procedures? (indicate date of review/approval, if done):

OU A Remedial Investigation Report Date: February 14, 2008

OU A Remedial Action Plan Date: August 28, 2008

OU A Remedial Action Completion Report Date: December 14, 2009

Consolidation Cell Investigation Conclusions and Phase II Enhancements Plan. Date: not approved by DTSC

Consolidation Cell Removal Work Plan Date: August 31, 2011

Explanation of Significant Differences

Date: August 31, 2011

Consolidation Cell Removal Report

Date: March 11, 2012

C. If site was abated by responsible party, did DTSC receive a signed statement from a licensed professional on all phases of the Remedial Actions? (indicate date of statement)

Yes No

OU A Remedial Action Completion Report

Date: December 14, 2009

Consolidation Cell Removal Report

Date: March 11, 2012

D. Did a registered engineer or geologist verify that acceptable engineering practices were implemented?

Yes No

Name: Michael Flieshner, P.E. Date: March 11, 2012

Name: Kristo Fabian, P.E. Date: December 14, 2009

E. Did DTSC confirm completion of all Remedial Actions?

Yes No Date: January 17, 2012

F. Did DTSC (directly or through a contractor) actually perform the Remedial Action?

Yes No

G. Was there a community relations plan in place?

Yes No

Community Relations Plan for the Georgia Pacific Mill Site was used, including the use of the mailing list.

H. Was a removal/remedial action plan developed for this site?

Yes (Redial Action Plan) No

I. Did DTSC hold public meetings regarding the draft RAP?

Yes No

Two public meetings were held during the public comment period for the OUA RAP. The first was held on March 26, 2008 and the second on April 11, 2008 at the Redwood Elementary School in Fort Bragg.

A Community Workshop was held on August 17, 2011 on the Consolidation Cell Removal and the Explanation of Significant Difference to the OUA RAP.

J. Were public comments addressed?

Yes No

Dates of DTSC analyses/responses: Responsiveness summary on the OUA RAP is Appendix E of the final RAP and dated August 28, 2008.

Response to Public Comments on the Explanation of Significant Differences – Consolidation Cell Removal and draft Initial Study/Negative Declaration is included as Attachment F of the Final Initial Study dated August 30, 2011.

K. Are all of the facts cited above adequately documented in the DTSC files?

Yes No

If no, identify areas where documentation is lacking:

12. EPA Involvement in the Remedial Action;

A. Was EPA involved in the site cleanup?

Yes No

B. If yes, did EPA concur with all remedial actions?

Yes No

C. EPA comments

EPA staff involved in cleanup: (name, title, address, and phone number)

13. Other Regulatory Agency Involvement in the Cleanup Action:

Agency:

Activity:

RWQCB

Reviewed and commented on draft documents

City of Fort Bragg

Concurred OUA RAP and ESD as a Polanco Agency

CHP

Caltrans

Other

California Coastal Commission

Name of contact persons and agency:

Ms. Linda Ruffing
City Manager
City of Fort Bragg

Mr. Bob Merrill
California Coastal Commission
Northern District

Mr. Craig Hunt
North Coast Regional Water Quality Control Board

14. Post Closure Activity:

**A. Will there be post-closure activities at this site?
(e.g. Operation and Maintenance)**

Yes No

An annual inspection report is required by the Land Use Covenant. The new owner of the Coastal Trail and Parkland Zone, the City of Fort Bragg, is responsible for submitting the annual inspection report. The purpose of the report is to confirm that land use restrictions have not been violated, soil has not moved off-site, and soil disturbing activities have not uncovered previously unknown contamination.

B. Have post-closure plans been prepared and approved by DTSC?
Not Applicable

C. What is the estimated duration of post-closure (including Operation and Maintenance) activities?
Not Applicable

D. Are deed restrictions proposed or in place?

Yes No

If "yes", have deed restrictions been recorded with the County recorder?

Yes No

If "no", who is responsible for assuring that the deed restrictions are recorded? NA

Who is the Division contact? _____

E. Has cost recovery been initiated?

Yes No

Georgia-Pacific is an ongoing remediation project with continuing cost recovery. Georgia-Pacific is current on paying DTSC and, as of February 6, 2012, has a zero balance.

F. Were local planning agencies notified of the cleanup action?

Yes No If "yes", the name and address of the agency:

City of Fort Bragg
Planning Department
416 North Franklin Street
Fort Bragg, California 95437

15. Expenditure of Funds and Sources: (Information to be supplied by Toxic Account Unit.) funding source and amount expended:

___ HWCA	\$ _____	___ HSA	\$ _____
___ HSCF	\$ _____	___ RCRA	\$ _____
___ RP	\$ 2.5 million	___ Other	\$ _____

(estimate RP has not provided actual costs)

___ Federal Cooperation Agreement \$ _____

16. **Problems Encountered Which Caused Major Delays:** The failure of the Consolidation Cell resulted in two year delay in certifying the completion of the OU-A Remedial Action Plan.

17. **Accomplishments Unique to this Project:** The removal of contaminants from OU-A, Coastal Trail and Parkland Zone was the first Operable Unit remediated at the former Georgia-Pacific Mill Site. Remediation and partial certification of the OU- A supported the sale of the Coastal Trail and Parkland Zone to the City of Fort Bragg for the development of the Coastal Trail.

Although the removal of the Consolidation Cell was in response to a failure of the cover/drainage system, the removal of the Consolidation Cell eliminated a long term environmental liability and legacy for Georgia-Pacific. Cell removal also allows for unrestricted reuse of the property once occupied by the Consolidation Cell.

18. **Final Use of Site:** OU-A, Coastal Trail and Parkland Zone will be developed by the City of Fort Bragg into a park. The future Coastal Trail will provide public access to an area of the Mendocino Coast that was in private ownership for over 100 years.