

MENDOCINO RAILWAY

Foot of Laurel Street
Fort Bragg, California 95437

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24 February 2025

Morgan Bigelow
Department of Toxic Substances Control
700 Heinz Avenue, Suite 100
Berkeley, California 94710

Subject: Alternatives Descriptions, OU-E Feasibility Study Addendum
Former Georgia-Pacific Wood Products Facility (Site Code: 202276)
KJ 1965021*21

Dear Ms. Bigelow:

The Department of Toxic Substances Control (DTSC) has requested preparation of an Operable Unit E (OU-E) Feasibility Study (FS) Addendum (DTSC 2024a,2024b). This FS Addendum expands on the work presented in the Final OU-E FS (Kennedy Jenks 2019; DTSC 2019) and Draft OU-E Remedial Action Plan (RAP; Kennedy Jenks 2020a, DTSC 2020a). Preparation of the FS Addendum is in progress.

A draft list of alternatives was shared in a letter to DTSC on 30 August 2024 (Mendocino Railway 2024). DTSC subsequently shared the letter with the Regional Water Quality Control Board (RWQCB), the California Coastal Commission (CCC), Division of Safety of Dams (DSOD), and the City of Fort Bragg (City). The list of alternatives to be included in the OU-E FS Addendum considers feedback from lead and responsible agencies under the California Environmental Quality Act (CEQA), including, but not limited to, DTSC¹ (with input from the RWQCB), CCC, and the City that was shared in meetings on 9 April 2024, 26 April 2024, and 17 December 2024. As documented in the 17 December 2024 meeting minutes (Kennedy Jenks 2025), the list of alternatives to be evaluated in the OU-E FS Addendum was refined in response to agency feedback and consists of the following:

- Excavation and filling of Pond 8 west, disposal of excavated sediment, and dam modifications
- Institutional controls/containment with dam modifications, including north dam improvements, cutoff wall, and rock slope protection on the interior of Pond 8 at the cribwall (alternative to current proposed rock slope protection design; herein termed “Interior Rock Slope Protection Alternative”)
- Institutional controls/containment with dam modifications, including north dam improvements, cutoff wall, and a seawall at the cribwall (alternative to current proposed rock slope protection design; herein termed “Seawall Alternative”)

¹ DTSC is the lead agency for activities associated with the OU-E FS, whereas the City is the lead agency for CEQA.

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The following alternatives will be described in the OU-E FS Addendum but screened out prior to the evaluation:

- On-site terrestrial treatment and consolidation
- Institutional controls/containment with dam modifications, including north dam improvements, cutoff wall, and construction of a secant pile wall at the cribwall (alternative to current proposed rock slope protection design)
- Institutional controls/containment with dam modifications, including north dam improvements, cutoff wall, and jet grouting at the cribwall (alternative to current proposed rock slope protection design)

To continue communication and collaboration efforts, a more detailed description of each conceptual alternative is provided below for review in advance of the OU-E FS Addendum. The descriptions provided herein are intended to confirm a shared understanding of the alternatives that will be evaluated in the OU-E FS Addendum. A description of the on-site terrestrial treatment and consolidation alternative is also included below.

Alternative Descriptions

Excavation and filling of Pond 8 west, disposal of excavated sediment, and dam modifications

This alternative involves the excavation and offsite disposal of sediment in the western portion of Pond 8 until confirmation sampling indicates remaining concentrations of COCs in sediment allow for unrestricted use classification of Pond 8 West.

Sediment would be excavated from Pond 8 West using conventional construction equipment and would be either temporarily stockpiled and managed to control dust and odors or directly loaded into truck beds. Dewatering and or stabilization with Portland cement may be necessary for excavated material with free draining water that cannot be dried within a reasonable space and time. Immediately after loading, the truck beds would be covered with a tarp and transported to an appropriate non-hazardous waste disposal facility. The final condition of the excavated area (e.g., backfilled with clean soil, cribwall removal) will be evaluated during design development and engineering feasibility and agency permit requirements will be taken into consideration.

Modifications to the Mill Pond Dam would be required. The existing spillway would remain, and a new spillway would be constructed at the approximate middle point of Pond 8, where the pond is narrow, which would also divide the remaining Pond 8 into two smaller ponds. To address DSOD requirements, the Mill Pond Dam would be modified to add a soil buttress at the northeast end. Pond 8 would continue to receive and treat stormwater from the site and the City of Fort Bragg. The beach berm would continue to protect the Mill Pond Dam from damage due to ocean intrusion in the lowland and

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would provide sediment containment for Pond 7, Pond 6, and the North Pond. The beach berm would continue to protect the Mill Pond Dam from damage due to ocean intrusion in the lowland. This alternative would require regular inspection and maintenance of both the Mill Pond Dam and the beach berm. This alternative would require significant sediment removal and removal/destruction of habitat in Pond 8 West.

Sediment in Pond 8 East, Pond 7, Pond 6, and the North Pond would remain in place. Institutional controls would be implemented for Pond 8 East, Pond 7, Pond 6, and the North Pond to provide land use controls (LUCs) for future site use which limit land use and control activities in areas where the risk from one or more exposure pathways is deemed unacceptable. The LUCs would provide requirements for development within the restricted area, such as development of a comprehensive SMP that provides detailed procedures for sediment-disturbing activities and describes required sampling and criteria for reuse of disturbed sediment. The LUCs and SMP would be consistent with future site use.

Institutional controls/containment with dam modifications, including north dam improvements, cutoff wall, and rock slope protection on the interior of Pond 8 at the cribwall

This alternative is consistent with the current recommended alternative for Pond 8, North Pond, Pond 6 sediments in the Final OU-E FS and the preferred alternative in the Draft OU-E RAP but proposes an alternative design element at the cribwall.

Sediment in Pond 8, Pond 7, Pond 6, and the North Pond would remain in place. Institutional controls would be implemented for Pond 8, Pond 7, Pond 6, and the North Pond to provide LUCs for future site use which limit land use and control activities in areas where the risk from one or more exposure pathways is deemed unacceptable. The LUCs would provide requirements for development within the restricted area, such as development of a comprehensive SMP that provides detailed procedures for sediment-disturbing activities and describes required sampling and criteria for reuse of disturbed sediment. The LUCs and SMP would be consistent with future site use.

Containment of sediment in Pond 8, Pond 7, Pond 6, and the North Pond would be provided by the existing Mill Pond Dam and beach berm. To address DSOD requirements, the Mill Pond Dam would be modified to add a soil buttress at the northeast end and rock slope protection on the interior of Pond 8 at the crib wall near the ocean. A cutoff wall would also be installed near the center of Pond 8 to divide into two smaller ponds. Pond 8 would continue to receive and treat stormwater from the site and the City of Fort Bragg. The beach berm would continue to protect the Mill Pond Dam from damage due to ocean intrusion in the lowland. This alternative would require regular inspection and maintenance of both the Mill Pond Dam and the beach berm.

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Institutional controls/containment with dam modifications, including north dam improvements, cutoff wall, and a seawall at the cribwall

This alternative is consistent with the current recommended alternative for Pond 8, North Pond, Pond 6 sediments in the Final OU-E FS and the preferred alternative in the Draft OU-E RAP but proposes an alternative design element at the cribwall.

Sediment in Pond 8, Pond 7, Pond 6, and the North Pond would remain in place. Institutional controls would be implemented for Pond 8, Pond 7, Pond 6, and the North Pond to provide LUCs for future site use which limit land use and control activities in areas where the risk from one or more exposure pathways is deemed unacceptable. The LUCs would provide requirements for development within the restricted area, such as development of a comprehensive SMP that provides detailed procedures for sediment-disturbing activities and describes required sampling and criteria for reuse of disturbed sediment. The LUCs and SMP would be consistent with future site use.

Containment of sediment in Pond 8, Pond 7, Pond 6, and the North Pond would be provided by the existing Mill Pond Dam and beach berm. To address DSOD requirements, the Mill Pond Dam would be modified to add a soil buttress at the northeast end and a seawall at the crib wall near the ocean. The seawall is assumed to be a new structure on the beach side of the existing Mill Pond Dam at the cribwall. A cutoff wall would also be installed near the center of Pond 8 to divide into two smaller ponds. Pond 8 would continue to receive and treat stormwater from the site and the City of Fort Bragg. The beach berm would continue to protect the Mill Pond Dam from damage due to ocean intrusion in the lowland. This alternative would require regular inspection and maintenance of both the Mill Pond Dam and the beach berm.

On-site terrestrial treatment and consolidation

This alternative involves the excavation and on-site consolidation of sediment from Pond 8, Pond 6, North Pond, and Pond 7. Excavation of sediment would be completed until confirmation sampling indicates remaining concentrations of COCs in sediment allow for unrestricted use classification of Pond 8, Pond 6, North Pond, and Pond 7.

Sediment would be removed and dewatered and/or stabilized with Portland cement if needed. A new Title 27 landfill would be constructed on-site for consolidation of treated sediment. The excavation areas may be backfilled with clean imported soil or the pond depth may be allowed to increase depending on the resulting geometry and agency permit requirements. Institutional controls would be implemented for the new Title 27 landfill and an operation and maintenance plan would be developed.

Although not required to comply with DTSC requirements, the Mill Pond Dam would remain and modifications would be required in this alternative. To address DSOD requirements, the Mill Pond Dam would be modified to add a soil buttress at the northeast end and rock slope protection at the crib wall near the ocean. A cutoff wall would also be installed near the center of Pond 8 to divide into two smaller ponds. Pond 8 would continue to receive and treat stormwater from the site and the City of Fort Bragg. The beach berm would continue to protect the Mill Pond Dam from damage due to ocean intrusion in

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the lowland. Require regular inspection and maintenance of both the Mill Pond Dam and the beach berm would be required.

As discussed in the December 2024 meeting and documented in the meeting minutes, the on-site terrestrial treatment and consolidation alternative will be discussed but screened out prior to the FS evaluation in the OU-E FS Addendum.

Conclusion

As described above, the alternatives discussed in the 17 December 2024 agency meeting have been further developed and presented herein, and are shared in advance of the OU-E FS Addendum to continue communication and collaboration efforts. The descriptions provided herein are intended to confirm a shared understanding of the alternatives that will be presented in the OU-E FS Addendum. The OU-E FS Addendum is in progress and is expected to be submitted by the deadline.

Very truly yours,

Mendocino Railway



Mike Buck
Project Manager

References

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- DTSC. 2024a. Letter from Morgan Bigelow, DTSC, to Mike Buck, Mendocino Railway, RE: Requirement to Complete Feasibility Study Addendum for Former Georgia-Pacific Mill Site, 90 West Redwood Avenue, Fort Bragg, Mendocino County, California (Site Code 202276). March 28.
- DTSC. 2024b. Letter from Morgan Bigelow, DTSC, to Mike Buck, Mendocino Railway, RE: Requested Extension for Feasibility Study Addendum, Former Georgia-Pacific Mill Site, 90 West Redwood Avenue, Fort Bragg, Mendocino County, California (Site Code 202276). May 16.
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Kennedy Jenks. 2019. Final Feasibility Study, Operable Unit E, Former Georgia-Pacific Wood Products Facility, Fort Bragg, California. 12 September.

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Kennedy Jenks. 2025. Email from Rachel Morgan, Kennedy Jenks, to Morgan Bigelow, DTSC, RE: Former Georgia-Pacific Mill Site - Mill Pond Dam. January 8.

Mendocino Railway. 2024. Letter from Mike Buck, Mendocino Railway, to Morgan Bigelow, DTSC, RE: Draft Alternatives List, OU-E Feasibility Study Addendum. August 30.

cc: Kim Walsh, DTSC
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