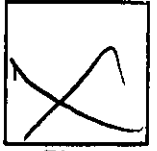


B

Type



Plans

GRD05-0165

Permit Number

100

Street Number

Kelly Rd

Street Name

CLO

Community Code

117-050-016

APN

COUNTY OF SONOMA - PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

2550 Ventura Avenue, Santa Rosa, CA 95403 (707) 565-1900 FAX (707) 565-1103

Please Print Your Name: <u>Ryan Spight Properties II LLC c/o Tyris Corporation</u>	Date Applied: <u>6-3-05</u>
--	------------------------------------

INFORMATION WITHIN HEAVY LINE TO BE COMPLETED BY APPLICANT

SITE LOCATION INFORMATION - PRINT CLEARLY			
Site Address: <u>100 Kelly Road</u>	City: <u>Cloverdale</u>	ZIP: <u>95425</u>	
Cross-Street: <u>Asti Road</u>	APN: <u>117-050-016</u>	Project Phone #: <u>707 894-0302</u>	Project Fax #: ()
Directions: <u>Hwy. 101 north to S. Cloverdale Blvd.</u>	Subd. Name: <u>n/a</u>	Unit #	Lot #
Describe Project: <u>exit Wood waste remediation former Louisiana-Pacific site</u>		Living Area _____	Contract Price: _____
Garage _____		Decks _____	

OWNER NAME AND ADDRESS			APPLICANT NAME AND ADDRESS		
Name: <u>Spight Properties II LLC c/o Tyris Corp.</u>			Name: _____		
Mailing Address: <u>1220 Diamond Way, Suite 100</u>			Mailing Address: _____		
City: <u>Concord</u>	State: <u>CA</u>	ZIP: <u>94521</u>	City: _____	State: _____	ZIP: _____
Day Ph: <u>925 288-9200</u>	Fax: <u>925 288-9202</u>		Day Ph: ()	Fax: ()	

CONTRACTOR INFORMATION

Company Name: _____

Address: _____

City: _____ State: _____ ZIP: _____

Day Ph: () Fax: ()

OTHER PERSONS (ARCHITECT, ENGINEER, ETC.)

Name: Curt Nichols (Carlile Macy)

Address: 15 Third Street

City: Santa Rosa State: CA ZIP: 95401

Day Ph: 707 542-6451 Fax: 707 542-5212

License No: RCE 17211 Exp. Date: 6-30-05

WORKER'S COMPENSATION DECLARATION

I hereby affirm under penalty of perjury one of the following declarations:

I have and will maintain a certificate of consent to self-insure for worker's compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

I have and will maintain worker's compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My worker's compensation insurance carrier and policy number are:

Carrier: _____
Policy No: _____

(This section need not be completed if the permit is for one hundred dollars (\$100) or less.)

I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the worker's compensation laws of California, and agree that if I should become subject to the worker's compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

Exp. Date: _____ Applicant: _____

CONSTRUCTION LENDING DECLARATION

I hereby affirm under penalty of perjury that there is a construction lending agency for the performance of the work for which this permit is issued. (Sec. 3097, Civ. C.)

Lenders Name: _____

Lenders Address: _____

FOR DEPARTMENT USE

Zoning: M3 File No: _____ Acres: _____

Existing Use/Structures: FORMER MILLS SITE

Proposed Use/Structures: GRADING FOR WOOD WASTE REMEDIATION

Zoning Min. Yard Requirements: Front _____ Left _____ Right _____

NOTE: Fire Safe Standards require all parcels greater than 1 Acre to have a min. 30' setback unless mitigated. Mitigation Required Address subject to change

Approval for Permit Issuance: _____

By: Michael Date: 6/22/05

Conditions: MUST comply with all UPE conditions

OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractor's License Law for the following reason (Sec. 7031.5, Business and Professions Code: Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractor's License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500).):

I, as owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044 Business and Professions Code: The Contractor's License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year of completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale.)

I, as owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business and Professions Code: The Contractor's License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractor's License Law.)

I am exempt under Sec. _____, B & P.C. for this reason _____

Date: 6/22/05 Owner: Justin L. Madala

Sewer Connection: Available Fees Paid

Approved by: _____ Date: _____

Road Encroachment: Fees Paid

Approved by: _____ Date: _____

Septic System Permit/Clearance # SEP 04-1197

Approved by: Jonathan Tracy Date: 6-22-05

Flood Zone: Yes No 100 Year Flood Elevation: _____

Site Review

Drainage Review:

Approved by: _____ Date: _____

Fire:

Approved by: _____ Date: _____

Code Enforcement Violation Yes No Violation # _____

This permit is limited to _____ days.

LICENSED CONTRACTOR'S DECLARATION

I hereby affirm under penalty of perjury that I am licensed under provisions of Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect.

Lic. Class _____ Lic. No. _____

Exp. Date _____ Contractor _____

ASBESTOS DECLARATION

Written asbestos notification pursuant to Part 61 of Title 40 of the Code of Federal Regulations is required when asbestos exists in buildings, or portions thereof, undergoing demolition. I hereby declare that demolition authorized by this permit is from construction that does does not contain asbestos, or that no demolition is authorized by this permit.

I certify that I have read this application and affirm under penalty of perjury that the above information is correct. I agree to comply with all local Ordinances and State laws relating to building construction. I hereby authorize representatives of the County of Sonoma to enter upon the above-mentioned property for inspection purposes. If, after making the Certificate of Exemption for the Worker's Compensation provision of the Labor Code I should become subject to such provisions, I will forthwith comply. In the event I do not comply with the Workman's Compensation law, this permit shall be deemed revoked.

PERMITTEE SIGNATURE: Justin L. Madala

15 Third Street Santa Rosa 95401
ADDRESS CITY ZIP

Contractor Owner Other Licensed Professional

Work Authorized: GRADING FOR WOOD WASTE REMEDIATION

<input checked="" type="checkbox"/> Plans Approved	<input type="checkbox"/> Post FIRM	<input type="checkbox"/> Alquist Priolo Report Available
<input type="checkbox"/> No Plans Subject to Field Inspection	<input type="checkbox"/> Pre FIRM	<input type="checkbox"/> Geotechnical report Available
Plancheck Cleared by: <u>[Signature]</u> Date: <u>6/21/05</u>	Type of Construction: _____	Occupancy: _____
Permit Cleared for Issuance by: <u>[Signature]</u> Date: <u>6/22/05</u>	Auto. Fire Sprinkler Req'd: _____	No. of Units: _____
Machine Space for Permit Fee		Certificate of Occupancy: _____

11/26 2 2005

Final Date: 9/11/08 Inspector: Karl [Signature]

THIS PERMIT SHALL EXPIRE IN THREE(3) YEARS FROM DATE FEES ARE PAID UNLESS OTHERWISE NOTED BY CODE ENFORCEMENT

JOB ADDRESS: 100 Kelly Rd
PERMIT NUMBER: GRD05-0165
INSPECTION AREA: 9

131)	SPECIAL INSPECTION REQUIRED	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	IF YES, SEE ADDITIONAL SHEET,
	INSPECTION RECORD	DATE	NAME	REMARKS
101)	ROUGH GRADING			Phase 2 Wood Remediation
103)	FOUNDATION			
	FORMS/SETBACK			
	FOOTING			
	WALLS			
106)	UFER GROUND #			
104)	CAISSONS/PIERS			
105)	SLAB			
107)	UNDERGROUND UTILITIES			
110)	MASONRY			
109)	RETAINING WALLS			
113)	FIREPLACE			
	FOOTING			
	HEARTH/PROTECTION			
	THROAT			
114)	CHIMNEY			
120)	UNDERFLOOR/UNDERSLAB			
115)	HYDRONICS			
116)	U/F ELECTRICAL			
117)	U/F MECHANICAL			
118)	U/F PLUMBING			
119)	U/F FRAMING			
139)	U/F INSULATION			
126)	SHEAR WALLS			
	<input type="checkbox"/> INTERIOR		<input type="checkbox"/> EXTERIOR	
127)	DIAPHRAGMS			
	<input type="checkbox"/> ROOF		<input type="checkbox"/> FLOOR	
134)	SIDING/SHEATHING			
125)	HOLD DOWNS			
132)	CLOSE-IN			
122)	ROUGH ELECTRICAL			
123)	ROUGH MECHANICAL			
124)	ROUGH PLUMBING			
128)	ROUGH FRAME			
160)	SMOKE DETECTORS			
139)	INSULATION			
142)	WALLBOARD			
143)	FIREWALLS			
135)	STUCCO/PLASTER			
	<input type="checkbox"/> LATH		<input type="checkbox"/> SCRATCH	
137)	ROOFING			
130)	TUB/SHOWER PAN			
162)	FIRE DAMPERS/DOORS			
164)	SUSPENDED CEILING			
	<input type="checkbox"/> ROUGH ELEC.		<input type="checkbox"/> ROUGH MECH.	
165)	EXITING - RAMPS/STAIRS			
163)	HANDRAILS/GUARDRAILS			
	CORRIDORS/DOORS			
166)	ACCESSIBILITY COMPLIANCE			
144)	WATER TANKS			
	<input type="checkbox"/> SLAB		<input type="checkbox"/> WALLS	
170)	TEMPORARY OCCUPANCY			
171)	TEMPORARY ELECTRICAL			
172)	TEMPORARY GAS			
174)	ELECTRIC METER AUTHORIZATION			
152)	PANEL BOARDS/SERVICE			
189)	SEPTIC ELECTRIC FINAL			
175)	GAS METER AUTHORIZATION			
153)	GAS PRESSURE TEST			
	HOUSE		YARD	
190)	MANUF. HOME FOUNDATION			
191)	MANUF. HOME INSTALLATION			
	CONTINUITY			
	STAIRS/SKIRTS			
	RIDGE BOLTING			
193)	MANUF. HOME COND. FINAL			
	SWIMMING POOLS			
194)	PRE-GUNITE			
195)	PRE-DECK			
196)	PRE-PLASTER/FENCE			
197)	VINYL/FIBERGLASS POOL EXCAVATION			
102)	GRADING FINAL			
176)	ELECTRICAL FINAL			
177)	MECHANICAL FINAL			
178)	PLUMBING FINAL			
199)	FINAL	9/1/08	RCL	
	OCCUPANCY (OK TO OCCUPY)			
650)	SUSMP INSPECTION			
651)	NPDES EROSION COMPLIANCE			
652)	NPDES SEDIMENT COMPLIANCE			
653)	NPDES DOCS/SWPPP			
	FIRE INSPECTION REQUIRED			
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
759)	KNOX BOX			
760)	PROPANE TANK HOLD DOWNS			
770)	SPRINKLER FINAL			
771)	ABOVEGROUND HYDROSTATIC			
772)	UNDERGROUND HYDROSTATIC			
773)	UNDERGROUND FLUSH			
774)	THRUST BLOCKS			
775)	PIPE WELD			
776)	HYDRANTS/APPLIANCES			
777)	PUMP ACCEPTANCE			
778)	WATER SUPPLY/TANK			
779)	ALARM SYSTEM			
780)	HOOD & DUCT SYSTEM			
781)	ABOVEGROUND TANK/DISPENSER			
198)	FIRE FINAL			
	CLEARANCES:			
	FIRE	<input type="checkbox"/> Local	<input type="checkbox"/> County	
	HEALTH DEPARTMENT			
	ZONING			
	SANITATION			
	PLAN RETENTION REQUIRED?			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			

PERMIT # GR205-0165

Required Cut/Fill Table For Grading Permits

BPC-008

Applicant Owner Architect \ Engineer

Project Site Information

Name Carlisle . Macy

Address(es) 100 Kelly Road

Mailing Address 15 Third st.

City/Town Clowardale

City/Town Santa Rosa CA 95401

Assessor's Parcel Number(s) 117-050-018

Phone (707) 542-6451 State/Zip 542-5212

Project Name (if applicable) Wood Waste Remediation

Signature [Handwritten Signature] Fax 06/08/2005

Former Louisiana - Pacific Site

Signature _____ Date _____

Please do not write in the shaded areas.

Cut	-		740,000 Cu. Yds.
Fill	+	1,060,000 Cu. Yds.	
Export	-		0 Cu. Yds.
Import	+	140,000 Cu. Yds.	
Shrinkage	-		0 Cu. Yds.
Totals		1,200,000 Cu. Yds.	740,000 Cu. Yds.

Purpose or use of grading:

The purpose of this projects grading is to Mitigate 600,000 C.Y. of wood waste by mixing the woodwaste with Soil at a 1:1 Ratio

Geotechnical report available? Yes No

Geotechnical report included with application? Yes No

Will more than 1 acre be denuded? Yes No

DO NOT WRITE BELOW THIS LINE - To Be Completed by PRMD Staff

Total volume used for fee calculations Cu. Yds.

For excavation and fill on the same site, the fee shall be based on the volume of excavation or fill, whichever is greater. (Reference is 1998 California Building Code Section 3310.2)

Activity No. GRD05-0165

Sonoma County Permit and Resource Management Department

2550 Ventura Avenue ❖ Santa Rosa, CA ❖ 95403-2829 ❖ (707) 565-1900 ❖ Fax (707) 565-1103

Development Submittal Information for Drainage Review

DRN-002

Please type or print the following information:			
Name of Development: Wood Waste Remediation (former Louisiana-Pacific site)			
Property Address: 100 Kelly Road		City, Zip: Cloverdale 95425	
Nearest Cross Street: Asti Road			
Assessor's Parcel Number: 117-050-018		Developer: Spight Properties II LLC c/o Tyris Corporation	
Design Engineer: Carlile Macy Address: 15 Third Street City, State, Zip: Santa Rosa, CA 95401 Phone No.: (707) 542-6451		Applicant Name: same as above Address: 1220 Diamond Way, Suite 100 City, State, Zip: Concord, CA 94520 Phone No.: (925) 288-9200	
Land Use (Planning) File #:		Permit Application # GRD05-0165	
Number of Units: 0		Disturbed Area: 59 acres	
U To Be Completed by Drainage Review U			
File/Unique #:		Quad Maps:	
Major Dev. (MJS/UP/DR): Minor Dev. (MNS/UP/DR):	Permit Referral: Public Project:		Flood Zone:
Fee based on: _____ base fee, _____ Units @ _____ per unit = _____			
Permit Referral Fee: _____ Flood Zone Fee _____ Date: _____ Receipt #: _____			
MJS/UP/DR Fee:	Amount	Date	Receipt #:
Base/minimum	_____	_____	_____
Balance or Total	_____	_____	_____
Review Engineer/Technician:		Final Letter Date:	
Comments:			



July 28, 2004

RETAIN

Sonoma County Permit & Resource
Management Department
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: Authorization to Sign Applications for Owner/Applicant
Wood Waste Landfill Remediation - 100 Kelly Road, Cloverdale, CA

To Whom It May Concern:

Spight Properties II LLC is the owner of the properties (APN: 117-050-016, -017, -018 and -019) for which a use permit for the remediation of a wood waste landfill is requested.

The purpose of this letter is to authorize Curtis L. Nichols of Carlile-Macy to sign the necessary applications on behalf of the owner/applicant, Spight Properties II LLC, c/o Tyris Corporation, for these permits.

Should you have any questions regarding this, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. H. Sexton", written in a cursive style.

Robert H. Sexton
President

Project Narrative
Wood Waste Landfill Remediation
Former Louisiana-Pacific Site
Cloverdale, CA
November 16, 2004

The proposed project involves the remediation of a wood waste landfill on the former Louisiana-Pacific sawmill site located at 100 Kelly Road at the southerly edge of the City of Cloverdale. The wood waste landfill to be remediated consists of two (2) areas totaling approximately 400,000 to 600,000 cubic yards. For purposes of this proposal, we are planning for remediation of 600,000 cubic yards. Accordingly, the east wood waste area is estimated to contain approximately 152,000 cubic yards of material and the west wood waste area is estimated to contain approximately 448,000 cubic yards. While the mixture of wood waste and soil is not toxic, its classification as a landfill requires remediation to be approved by the Regional Water Quality Control Board. PES Environmental has prepared a Draft Report of Waste Discharge dated February 6, 2003 for the Regional Board's approval and Carlile Macy has prepared a grading plan to implement the remediation. The proposed wood waste landfill remediation is independent of the planned Alexander Valley Resort project and will go forward regardless of any future resort project.

The remediation plan calls for excavation of the wood waste mounds and screening of the material to separate out the larger pieces of wood and bark. The screened material will be hauled to the old sawmill / log deck area easterly of the railroad where it will be mixed at an approximate 1:1 ratio with clean borrow soil and placed and compacted as fill. It is anticipated that the majority of the wood waste will be suitable for mixing without need for further grinding. The remaining larger pieces of wood are anticipated to be ground up into smaller fragments and mixed as outlined above. Approximately 600,000 cubic yards of clean borrow soil is anticipated to be required to achieve a 1:1 mix with the wood waste material. This borrow soil will come from three sources. Approximately 390,000 cubic yards will be excavated from the old log deck area below the area where the mixed material is to be placed (Borrow Area I). Approximately 70,000 cubic yards of soil will be excavated from the previously graded plateau area of the site (Borrow Area II) and approximately 140,000 cubic yards of soil will be imported from offsite. The combined 1:1 mixture of soil and wood waste to be placed as compacted fill on the old log deck area is anticipated to comprise approximately 1,200,000 cubic yards. The grading plans show the locations of the east and west wood waste landfill areas, the proposed borrow areas I and II, and the proposed fill area. The proposed fill area has been designed to create a rounded, contoured form to appear more natural than a typical engineered fill.

A Delineation of Wetlands and Other Waters of the United States was performed by Jane Valerius and Zander Associates and verified by Philip Shannin of the U.S. Army Corps of Engineers on May 29, 2003. All waters found on the site were determined to be "isolated waters" or "isolated wetlands" with the exception of Porterfield Creek, the Russian River, and a small drainage near Asti Road near the westerly boundary of the site. While not determined to be "waters of the U.S.," the isolated wetlands are still

considered to be "waters of the state" and potentially subject to regulation by the State of California. Accordingly, the fill and borrow grading activities associated with the proposed wood waste landfill remediation are located outside of all wetland areas as shown the Overall Site Plan (Dwg. 3 of 8) in order to avoid disturbance of the wetland areas.

There are several existing groundwater monitoring wells on the site as shown on the Overall Site Plan (Dwg. 3 of 8). Four are associated with the wood waste landfill and the remainder are associated with the former Masonite wood treatment facility. All existing monitoring wells are located outside of proposed grading areas and will not be disturbed.

The remediation is planned to occur during the construction season from approximately March to October. Work hours are anticipated to be 7:00 AM to 5:30 PM Monday through Saturday. Portable toilets will be installed onsite for the construction workers. Water storage tanks will be provided onsite to provide sufficient water for suppression of potential equipment fires as well as to supply water trucks for dust control.

The grading taking place on this site to complete the Wood Waste Remediation will not significantly change any current drainage patterns or increase the amount of runoff which comes from the project. No storm drain systems are proposed nor do the plans indicate the addition of any new impervious surfaces, thus the time of concentration and the runoff coefficient (C-Value Rational formula) will not significantly change after the grading is completed.

DRAINAGE REVIEW

CARLILE • MACY

15 Third Street
Santa Rosa, CA 95401
Tel: 707 542 6451
Fax: 707 542 5212

July 29, 2008

Ms. Kirsten Larsen
SONOMA COUNTY PERMIT & RESOURCE MANAGEMENT DEPT.
2550 Ventura Avenue
Santa Rosa, CA 95403

SUBJECT: UPE04-0098 – Wood Waste Landfill Remediation
GRD04-0317 and GRD05-0165 – Grading Permits
100 Kelly Road
Cloverdale, CA

Dear Kirsten:

This letter is intended to follow up our earlier conversation and provide materials you requested to close out the grading permits associated with the clean closure of the wood waste landfill on the subject property. The following materials are being submitted with this letter:

1. Chronology and Summary of Permit Process for Clean Closure of Wood Waste Landfill – a chronology and summary of the permit process providing the background and context for the subject grading permits
2. Wood Waste Remediation Phase II Erosion Control Plans dated November 2007 (6 Sheets) – these plans reflect the grading as constructed and the erosion control measures installed in Fall 2007
3. Engineer's Grading Conformance Letter from Carlile • Macy dated 7/28/08 – this letter indicates that the grading was constructed in substantial conformance to the grading plans prepared by Carlile • Macy
4. Summary Report of Compaction Test Results prepared by SHN Consulting Engineers and Geologists dated 6/18/08 – this report summarizes the geotechnical services provided by SHN in support of the grading
5. Summary Report prepared by RGH Geotechnical and Environmental Consultants dated 6/12/08 – this report summarizes the geotechnical services provided by RGH in support of the grading

Ms. Kirsten Larsen
SONOMA COUNTY PERMIT & RESOURCE MANAGEMENT DEPT.
July 29, 2008
Page 2

With these materials we believe the files on the subject grading permits can now be closed out. Your assistance with this is very much appreciated. If there is anything further you need or anything I can do to assist you with this, please don't hesitate to call.

Very truly yours,

CARLILE • MACY



CURTIS L. NICHOLS

CLN:bc
N:2000006.A0/Gen Corres/Larsen Ltr 072908

Attachments

cc: Michele McCarthy, Tyris Corporation

Chronology and Summary of Permit Process for Clean Closure of Wood Waste Landfill Former Louisiana-Pacific Site - 100 Kelly Road, Cloverdale

June 2008

On April 11, 2003, Spight Properties II, LLC ("SPII") submitted a Work Plan for a Pilot Test of the Wood Waste Landfill Clean Closure Process with the Regional Water Quality Control Board, North Coast Region ("Regional Board"). The purpose of the Pilot Test was to evaluate various excavation and processing methodologies and procedures for clean closure of the landfill. An addendum to the Work Plan was submitted on September 4, 2003 and both the Work Plan and Addendum were approved by the Regional Board on September 9, 2003. The Pilot Test was authorized by PRMD by Zoning Permit ZPE03-0016.

Grading permits [GRD03-0024 (8,000 cy of cut) and GRD03-0025 (16,000 cy of fill)] for the Pilot Test were approved for permit issuance on September 11, 2003 and the work commenced. A Completion Report for the Pilot Test was submitted to the Regional Board on December 9, 2003. Applicant was advised by letter from PRMD on May 10, 2007 that GRD03-0025 had expired, and advised on August 7, 2007 that GRD03-0024 had expired.

On July 30, 2004 SPII submitted a Use Permit application (UPE04-0098) for remediation of the wood waste landfill. On March 24, 2005 the Board of Zoning Adjustments adopted a Mitigated Negative Declaration and granted the requested use permit, subject to conditions. Condition #1 required SPII to obtain site review and grading permits from PRMD.

Condition #4 of UPE04-0098 required documentation from the Regional Board. On March 29, 2005 SPII filed an Application/Report of Waste Discharge with the Regional Board for the remediation of the wood waste landfill. On June 22, 2005 the Regional Board adopted Closure Waste Discharge Requirements which were submitted to PRMD as evidence of compliance with Condition #4.

Grading Permit GRD04-0317 was approved for permit issuance on June 10, 2005 which allowed initial grading in areas of the site which did not contain wood waste piles. On June 22, 2005, after adoption of the WDRs by the Regional Board, Grading Permit GRD05-0165 (plans referenced as Phase II) was approved for permit issuance for grading of the remaining areas.

Following completion of site preparation activities, full-scale clean closure activities commenced in late June of 2005. The wood waste landfill clean closure activities were conducted between June 2005 and October 2005 at both the eastern and western wood waste units; between May 2006 and October 2006 at the western wood waste unit; and from May 2007 through July 2007 at both the western and eastern wood waste units. Complete removal of both the western and eastern units was accomplished by the end of July 2007.

Currently, approximately 15,000 cubic yards of petroleum hydrocarbon-impacted wood waste material, which was generated during clean closure of the eastern waste unit, is stockpiled on-site. The existing stockpiled wood waste material is placed on and covered with plastic sheeting and is awaiting potential off-site disposal at a landfill (pending landfill profiling and approval). The RWQCB is overseeing the management and final disposition of the stockpiled petroleum hydrocarbon-impacted wood waste material since the impacted wood waste material was generated during the landfill clean closure process. As required by the WDRs, a wood waste landfill clean closure report is currently being prepared and will be submitted to the RWQCB for approval of the entire project. Pending the RWQCB's approval of the clean closure efforts, the WDRs will be rescinded.



15 Third Street
 Santa Rosa, CA 95401
 Tel: 707 542 6451
 Fax: 707 542 5212

July 28, 2008

Ms. Kirsten Larsen
 Sonoma County Permit & Resource Management Dept.
 2550 Ventura Avenue
 Santa Rosa, CA 95403

SUBJECT: Grading in Conformance with Plans
 Grading Permits - GRD04-0317 and GRD05-0165
 100 Kelly Road, Cloverdale, CA

Dear Kirsten:


We prepared grading plans in support of the clean closure of the wood waste landfill on the subject property. We prepared an initial set of plans dated 6/3/05 for which permit GRD04-0317 was issued on 6/10/05. These plans provided for initial grading of areas that did not contain wood waste and this initial permit allowed grading to commence in these areas prior to the Regional Water Quality Control Board's ("RWQCB") adoption of Closure Waste Discharge Requirements. We also prepared another set of plans (referenced as Phase II) dated 6/9/05 which encompassed grading of the remaining areas containing wood waste and for which permit GRD05-0165 was issued on 6/22/05 following the RWQCB's adoption of Closure Waste Discharge Requirements.

We conducted a topographic survey of the east and west wood waste areas following construction and this data is incorporated into our Phase II Erosion Control Plans dated November 2007, a copy of which is included with this letter. Additionally, Tyrus Corporation supplied us with topographic data they compiled for "Fill and Borrow Area I" which shows that the top of the fill is at elevation 305 in compliance with the plans. The top of the fill has a slightly flatter slope in some areas than shown on the plans.

Based on the above, we believe the grading has been accomplished in substantial conformance to the plans we prepared.

Very truly yours,

CARLILE • MACY


 David C. Hanson, PE
 Project Manager



DCH:bc
 N:2000006.A0/Gen Corres/Larsen grading Ltr 072508

Attachments

cc: Michele McCarthy, Tyrus Corporation



Reference: 406008

June 18, 2008

Attn: Chuck Bartelson
Tyris Corporation
320 Santana Drive
Cloverdale, Ca 95425

**Subject: Summary of Compaction Test Results, Proposed Golf Course Grading,
Between Asti Road and the Russian River, Cloverdale, California**

Dear Mr. Bartelson:

In accordance with your request, we have performed geotechnical services in conjunction with compaction testing for the proposed golf course grading. Our services to date have consisted of field density testing, laboratory testing, and presentation of test result summaries.

A total of 20 relative compaction tests were conducted during grading operations from 5/26/06 to 10/2/07. Density tests were performed in accordance with American Society for Testing and Materials (ASTM) D: 1556 (Sand Cone Method) and ASTM D: 2922 (Portable Nuclear Device). Composite samples were collected for maximum dry density determination by the modified Proctor method ASTM D: 1557. Results of the density tests are presented on the attached Summary of Field Density Tests, Table I. Maximum dry density and optimum moisture content determinations are presented on the attached Summary of Maximum Dry Density/ Optimum Moisture Content Tests, Table II. Approximate locations and elevations of the field density tests are described on the attached Summary of Field Density Tests, Table I.

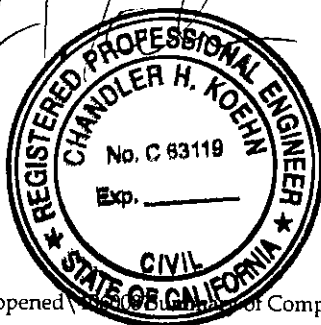
Our services were performed using the degree of care and skill ordinarily exercised, under similar circumstances, by reputable Soils Engineers and Geologists practicing at this time in this or similar localities.

This opportunity to be of service is appreciated. If you have any questions, please call.

Sincerely,

SHN Consulting Engineers and Geologists, Inc.

Chandler H. Koehn, PE
Civil Engineer 63119
(Expiration 6/30/08)



Gerald B. Barringer
Engineering Technician

Summary of Compaction Test Results

Project No. 406008

June 18, 2008

Page 2 of 3

**TABLE I
SUMMARY OF FIELD DENSITY TESTS
(ASTM D: 1556 & 2922)**

Test No.	Density Test Location	Test Date	Soil No.	Elev. (feet)	Dry Density (pcf)	Moist. Content (%)	Relative Compaction (%)
1-06 Sc	Lat. 38d 47.09'N Long. 122d59.84'W	5/26/06	1	275.1	121.3	14.4	95.5
2-06 Sc	Lat. 38d 49.06'N Long. 122d59.88'W	6/08/06	1	285.0	112.0	15.3	88.2
3-06 Sc	Lat. 38d 47.09'N Long. 122d59.85'W	6/23/06	2	290.1	123.0	13.0	91.1
4-06 Sc	Lat. 38d 47.08'N Long. 122d59.93'W	7/11/06	3	300.3	120.4	10.5	95.6
5-06 Sc	Lat. 38d 47.19'N Long. 122d59.93'W	8/01/06	4	277.3	77.5	21.8	73.8
6-06 Nu	Trummel Site Lat. 38d 46.855'N Long. 123d 00.278'W	8/16/08	6	385	123.0	12.5	93.5
7-06 Sc	Trummel Site Lat. 38d 46.855'N Long. 123d 00.278'W	8/16/08	6	388	124.4	12.1	94.6
8-06 Sc	Trummel Site Lat. 38d 46.855'N Long. 123d 00.278'W	8/16/08	6	391	122.5	13.0	93.2
9-06 Sc	Lat. 38d 47.15'N Long. 122d59.91'W	8/31/06	5	292.2	107.3	11.6	97.5
10-06 Sc	Lat. 38d 47.15'N Long. 122d59.938'W	9/20/06	2	300.9	124.3	14.1	92.1
11-06 Sc	Lat. 38d 47.23'N Long. 122d59.944'W	10/16/06	8	281.5	100.3	13.1	89.2
1-07 Sc	Lat. 38d 47.123'N Long. 122d59.95'W	5/23/07	5	289.5	105.5	18.6	95.9
2-07 Nu	Lat. 38d 46.882'N Long. 123d00.066'W	9/27/07	7	334	124.3	13.0	99.4
3-07 Nu	Lat. 38d 46.885'N Long. 123d00.081'W	9/27/07	7	334	115.7	11.5	92.6
4-07 Nu	Lat. 38d 46.841'N Long. 123d00.212'W	9/27/07	7	357	115.8	16.2	92.6
5-07 Nu	Lat. 38d 46.879'N Long. 123d00.255'W	9/27/07	7	347	110.7	16.6	88.6

Summary of Compaction Test Results

Project No. 406008

June 18, 2008

Page 3 of 3

**TABLE I
SUMMARY OF FIELD DENSITY TESTS
(ASTM D: 1556 & 2922)**

Test No.	Density Test Location	Test Date	Soil No.	Elev. (feet)	Dry Density (pcf)	Moist. Content (%)	Relative Compaction (%)
6-07 Nu	Lat. 38d 46.874'N Long. 123d00.081'W	10/2/07	7	329	116.4	13.8	93.1
7-07 Nu	Lat. 38d 46.880'N Long. 123d00.068'W	10/2/07	7	328	118.4	13.5	94.7
8-07 Nu	Lat. 38d 46.850'N Long. 123d00.235'W	10/2/07	7	352	114.7	16.3	91.8
9-07 Nu	Lat. 38d 46.885'N Long. 123d00.256'W	10/2/07	7	351	112.4	15.4	89.9

- i) Sc - denotes density by Sand Cone Method (ASTM 1556).
- ii) Nu - denotes density by Portable Nuclear Gauge Method (ASTM 2922).
- iii) Density Test Location and Elevation (Elev.) obtained with a hand held GPS unit.

**TABLE II
SUMMARY OF MAXIMUM DRY DENSITY/OPTIMUM MOISTURE
CONTENT TESTS
(ASTM D: 1557)**

Soil No.	Description	Maximum Dry Density (pcf)	Optimum Moisture Content (%)
1	Dark brown to gray brown clayey sand	127.0	11.0
2	Gray brown gravelly clayey sand	135.0	7.5
3	Dark brown gravelly clayey sand	126.0	11.5
4	Olive gray highly organic silty clay	105.0	15.0
5	Dark gray gravelly silty clay	110.0	11.5
6	Dark brown sandy clayey gravel	131.5	7.0
7	Dark brown clayey gravelly sand	125.0	10.0
8	Dark brown to dark gray highly organic sandy and clayey silt	112.5	13.0



CONSULTANTS, INC.

*Geotechnical
Geological
and Laboratory Services*

June 12, 2008

Tyris Corporation
Attn: Michele McCarthy
1220 Diamond Way, Suite 100
Concord, CA 94521
Email: mmccarthy@tyriscorp.com

RE: Field and Laboratory Testing Services
During Grading
Alexander Valley Resort
Wood Waste Remediation
100 Kelly Road
Cloverdale, California

Project Number: 1999.02.00.1

This report documents the field and laboratory testing services we provided during grading for the wood waste remediation landfill at 100 Kelly Road in Cloverdale, California. The results of a preliminary geologic/geotechnical feasibility study for the project were presented in a report by Kleinfelder, Inc. dated August 29, 2002. Supplemental recommendations were presented in our letter dated February 14, 2003.

Project Description

The improvement plans by Carlile Macy dated July and September, 2004 indicate that this phase of the project involves the construction of a landscape fill pad on the northeast side of the property between the railroad tracks and the Russian River with a total of about 1.2 million cubic yards of fill. Prior to fill placement, the fill area will be excavated up to about 8 feet deep. The material generated from this excavation, soil from two other on-site borrow areas, and import fill will be mixed at a 1:1 ratio (unless otherwise specified by the geotechnical engineer) with wood waste material from two existing stockpiles on the southeast side of the property. The grading plans show fill thicknesses up to about 32 feet and cuts of up to 13 feet for the borrow areas and fills up to 72 feet for the wood waste landfill area.


Field and Laboratory Testing Services During Construction

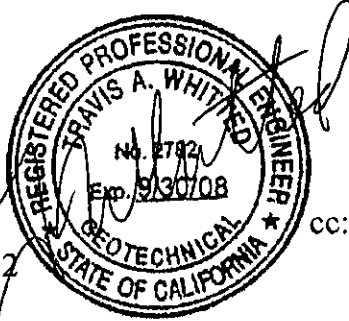
Our field engineer was at the site on an intermittent, on-call basis at the direction of the client to perform field density tests in the fill. Bulk samples of the fill material were tested in our laboratory to determine the optimum moisture content and maximum dry density

in accordance with the ASTM Test Method D1557. The field densities were compared with the corresponding maximum density to evaluate the degree of compaction achieved. Between September 2003 and October 2005 we performed a total of nine field density tests with relative compactations ranging from 85 to 96 percent. The results of the field density tests were transmitted to the client after each visit.

We trust this provides the information you require at this time. If you have questions or wish to discuss this further, please call.

Very truly yours,
RGH Consultants, Inc.


Travis A. Whitted
Geotechnical Engineer - 2782



cc: Carlile Macy
Attn: Curt Nichols
Email: cnichols@carlilemacy.com

TAW:KSG:tw:sm
Two Copies Submitted

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GRD05-0165

100 Kelly Rd, Clo

#199 (P) FINAL GEOTECH. REPORT REQUIRED, WOOD WASTE
STOCK PILES ON-SITE & NOT SHOWN ON PLANS. ON-SITE
STOCK PILES OF POSSIBLE CONTAMINATED SOILS NOT SHOWN
ON PLANS. COND. # 16 (TPW) STATES ENTRANCE TO BE
IMPROVED. - MEASURED W/REP. APPEARS TO MEET COND. CLEAR
LOWER LIMBS OF TREE & SHAVE BACK ENBANKMENT. ^{MAY HAVE ENG. PROVIDE} EXHIBIT SHOWING LPS, MET.
REP. STATES NO WORK FOR REST OF YEAR, PROTECTIVE
FENCING TO BE REMOVED & PROPERLY DISPOSED OF OR
RESTORED PER PERMITTED PLANS. 4/9/08 KCL

#199 (A) REC'D FINAL REPORTS & HAVE APPROVAL FROM J. TRACY
TO FINAL W/O REMOVAL OF WOOD WASTE STOCKPILES.

KCL 9/11/08

CHECK ON

GRD03-0024

GRD03-0025

EXPIRED



March 25, 2003

829.001.01.003

California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, #A
Santa Rosa, California 95403

Attention: Ms. Jan Goebel

**WORK PLAN
PETROLEUM HYDROCARBON-AFFECTED SOIL AND LIMITED
GROUNDWATER REMEDIATION
FORMER LOUISIANA-PACIFIC CORPORATION FACILITY
CLOVERDALE, CALIFORNIA**

Dear Ms. Goebel:

PES Environmental, Inc. (PES) is pleased to present this work plan to address soil and groundwater impacted by petroleum hydrocarbons at the former Louisiana-Pacific Corporation (L-P) facility located in Cloverdale California (the site; Plate 1). This work plan is being submitted to the California Regional Water Quality Control Board, North Coast Region (RWQCB) on behalf of Spight Properties II, LLC (Spight), the current owner of the property. As presented below, Spight plans to conduct remedial actions to address the petroleum hydrocarbon-affected soil and groundwater that was previously discovered by L-P within the former sawmill complex (Plate 2).

Soil and groundwater quality investigations have been conducted at the former sawmill complex by PES and others, indicating that subsurface soils and groundwater have been affected primarily by petroleum hydrocarbons, specifically total petroleum hydrocarbons quantified as diesel (TPHd) and as motor oil (TPHmo). The scope of work outlined in this work plan has been developed to remediate petroleum hydrocarbon-affected soil and groundwater in the vicinity of the former sawmill head rig and mechanic's shop (Plates 3 and 4). Remedial actions are proposed to mitigate potential effects to future site occupants and groundwater.

Ms. Jan Goebel
March 25, 2003
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BACKGROUND

Site Description

The former L-P site is comprised of approximately 251 acres located approximately 2 miles southeast of the City of Cloverdale. A vicinity map showing the location of the property is presented as Plate 1. A site plan showing former structures associated with the sawmill complex is presented on Plate 2. The sawmill head rig and mechanic's shop were formerly located in the eastern portion of the property, as shown on Plates 3 and 4.

Summary of Previous Investigations

On behalf of L-P, SHN Consulting Engineers and Geologists (SHN) of Eureka, California conducted a Phase I Environmental Site Assessment (ESA) in 1995 to evaluate potential sources of hazardous materials throughout the L-P facility including the sawmill complex (SHN, 1995). Based on the results of their ESA, SHN conducted a few phases of soil and groundwater sampling and analysis at potential hazardous material release areas in February and September 1996 (SHN, 1997).

Review of SHN's previous investigation results indicate that shallow soils in the vicinity of the former sawmill head rig and steam cleaner pad contain elevated concentrations of heavy fraction petroleum hydrocarbons (greater than 100 milligrams per kilogram [mg/kg]), reported as TPHd and TPHmo. Elevated concentrations of petroleum hydrocarbons were also observed in shallow soil samples collected from four other locations including SMHOS-101 located west of the former head rig, SMOS-103 located within the former oil storage area, and SW14 and SMSCP-103 located near the former steam cleaner (Plate 3). Based on the limited number of soil samples with elevated petroleum hydrocarbon concentrations relative to the area covered by SHN's investigation, and the lack of petroleum hydrocarbons present in groundwater, petroleum hydrocarbon-affected soil in these other areas appears to be limited in lateral and vertical extent. Several soil samples were also analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX). No detectable concentrations of these analytes were observed. Analytical results of historical soil sampling conducted by SHN are presented in Table 1 and graphically shown on Plate 3.

SHN collected two grab groundwater samples at the sawmill complex at borings WP-SWHR104 and WP-SW105. The grab groundwater samples were analyzed for the presence of TPHd, TPHmo, and BTEX. Only toluene was detected in the samples, and at a very low concentration (0.78 micrograms per liter [$\mu\text{g/L}$]). The groundwater sample from boring WP-SWHR105, which was located immediately south of the steam-cleaning pad adjacent to the mechanic's shop, was also submitted for analysis of volatile organic compounds

Ms. Jan Goebel
March 25, 2003
Page 3

(VOCs). No VOCs were detected in the sample. Analytical results of historical groundwater sampling conducted by SHN are presented in Table 3 and graphically shown on Plate 4.

Based on the results of SHN's investigations, PES conducted an additional subsurface soil and groundwater investigation in February 2000. The purpose of the investigation was to further assess the horizontal and vertical extent of petroleum hydrocarbons in shallow soils and groundwater in the vicinity of the former head rig and mechanic's shop. The results of PES' investigation are presented in PES' report entitled *Soil and Groundwater Investigation* dated August 14, 2000 that was previously submitted to the RWQCB (PES, 2000). PES' investigation included drilling six soil borings (VCB-1 through VCB-3 and VCB-7 through VCB-9), five of which were advanced into groundwater to facilitate the collection of groundwater samples (all except boring VCB-8). Soil and groundwater samples collected during the investigation were analyzed for total petroleum hydrocarbons quantified as gasoline (TPHg), TPHd, BTEX, VOCs, arsenic, and chromium.

PES collected ten soil samples for laboratory analyses from the six soil borings from depths ranging from 4.0 to 10.5 feet below ground surface (bgs). TPHg was only detected in soil samples from two of the six borings at concentrations of 7.51 mg/kg and 23.6 mg/kg (borings VCB-2 and VCB-3, respectively). TPHd was only detected in soil samples from two of the six borings at concentrations of 7,040 mg/kg and 30,500 mg/kg (borings VCB-3 and VCB-2, respectively). Benzene was not detected in any of the soil samples. Toluene was detected in five samples ranging in concentration from 0.56 micrograms per kilogram ($\mu\text{g}/\text{kg}$) from boring location VCB-8 to 92 $\mu\text{g}/\text{kg}$ from boring location VCB-2. Additionally, ethylbenzene, total xylenes, and other VOCs were detected in the sample collected from boring location VCB-2 at relatively low concentrations. Arsenic was not detected in any of the soil samples collected, while chromium was detected in all of the soil samples within expected background concentrations. Soil sampling analytical results from PES' investigation are presented in Tables 2 and 3 for organic and inorganic constituents, respectively. Soil sampling locations and graphical representation of the organic analytical results are provided on Plate 3.

Groundwater was encountered during PES' investigation between 10.5 and 12 feet bgs. PES collected five groundwater samples for laboratory analyses from borings VCB-1 through VCB-3, VCB-7, and VCB-9. TPHg was detected in only one groundwater sample collected from boring location VCB-3 at a concentration of 50.6 milligrams per liter (mg/L). TPHd was detected in two groundwater samples at concentrations of 15.3 mg/L and 1,290 mg/L (borings VCB-2 and VCB-3, respectively). Toluene was detected in two groundwater samples at concentrations of 0.51 mg/L and 0.63 mg/L (borings VCB-1 and VCB-7, respectively). No other VOCs were detected in groundwater. Additionally, pentachlorophenol was not detected in any of the five groundwater samples. Arsenic was detected in two groundwater samples at a maximum concentration of 19.3 $\mu\text{g}/\text{L}$, well within expected background concentrations. Chromium was detected in the samples collected from each boring sampled at a maximum

Ms. Jan Goebel
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concentration of 39.1 $\mu\text{g/L}$ (boring location VCB-3), also well within expected background concentrations. Groundwater sampling analytical results from PES' investigation are presented in Tables 3 and 4. Groundwater sampling locations and graphical representation of the organic analytical results are provided on Plate 4.

REMEDIAL OBJECTIVES AND PROPOSED TARGET CLEANUP GOALS

The remedial objectives for the petroleum hydrocarbon-affected soil and groundwater east of the former head rig and north of the former log ramp are: (1) source removal; and (2) to minimize future impacts to groundwater. In accordance with the *Water Quality Control Plan for the North Coast Region* (Basin Plan; RWQCB, 1993), the proposed soil and groundwater target cleanup goals are the "Water Quality Objectives." Hence, the proposed target cleanup goals for TPHg, TPHd, TPHmo, and toluene are 50 $\mu\text{g/L}$, 100 $\mu\text{g/L}$, 100 $\mu\text{g/L}$, and 42 $\mu\text{g/L}$, respectively, for both groundwater and soluble fractions of contaminants soil (analyzed using deionized water as the extract). Additional VOCs detected during PES' February 2000 investigation were limited to one soil sample collected in the center of the proposed remediation area at approximately 6 feet bgs. Because the area of soil in which the VOC detection was located will be removed during petroleum hydrocarbon-affected soil remediation activities, and because no VOCs, other than toluene as indicated above, have been detected in groundwater, no soil or groundwater target cleanup goals for VOCs are necessary. Additionally, due to observed concentrations of arsenic and chromium well within expected background concentrations, no soil or groundwater target cleanup goals for these metals are necessary.

Although four other sampling locations investigated by SHN had concentrations of motor oil-range petroleum hydrocarbons greater than 100 mg/kg (as discussed above), subsequent soil and/or groundwater investigations near these locations suggest that the petroleum hydrocarbons in these areas are very limited in horizontal and vertical extent. Spight's future site redevelopment plans include placing approximately 8 to 10 feet of fill over these areas as part of a golf course development. In PES' opinion, the identified hydrocarbons typically exhibit low mobility and toxicity in the environment and do not represent a significant environmental or human health risk under current conditions or anticipated future land use. Consequently, based on the observed limited extent of heavy fraction petroleum hydrocarbons in these areas and the anticipated future site use, no remediation is proposed.

PROPOSED SCOPE OF WORK

The scope of work to address the petroleum hydrocarbon-affected soil and groundwater in the vicinity of the former head rig and mechanic's shop includes the following activities:

Ms. Jan Goebel
March 25, 2003
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(1) planning and site preparation activities; (2) excavation of petroleum hydrocarbon-affected soil; (3) removal of petroleum hydrocarbon-affected groundwater; (4) post-removal verification sampling and analysis; and (5) data evaluation and reporting. These tasks are described in detail below.

Planning and Site Preparation Activities

Prior to conducting remediation activities, the existing site-specific Health and Safety Plan (HSP) will be modified to comply with Occupational Safety and Health Administration, 29 CFR 1910.120 and California Code of Regulations Title 8 CCR G150 5192. Additionally, any remediation subcontractors selected to perform remedial work on-site will be required to prepare an HSP for their activities. Any permits required for the excavation activities will be obtained prior to beginning work.

Underground Service Alert (USA) will be contacted prior to conducting the remediation to schedule visits by public and private utility companies. Additionally, a private underground utility locating service may be hired to clear the proposed excavation of subsurface utilities.

Site preparation activities prior to implementation of the remedial actions will include removal of any existing ground cover, including asphalt and/or concrete, from the excavation area and stockpiling the materials for off-site disposal or on-site reuse.

Excavation of Petroleum Hydrocarbon-Affected Soil

As shown on Plates 3 and 4, an area of approximately 3,300 square feet, located to the east of the former head rig and north of the former log ramp, is proposed to be excavated due to the presence of elevated concentrations of petroleum hydrocarbons in soil, which are anticipated to exceed the soil target cleanup goals. The petroleum hydrocarbon-affected soil was observed to extend from near ground surface to groundwater, which was encountered during previous investigations at depths ranging from approximately 10.5 to 12 feet bgs. Soil will be excavated an additional one to three feet below the encountered groundwater depth, if feasible, for a total excavation depth of approximately 11.5 to 15 feet bgs, in order to remove elevated petroleum hydrocarbon-affected soil located beneath the groundwater table as well as to facilitate the removal of a limited amount of impacted groundwater from this localized area. Based upon an areal extent of affected soil of approximately 3,300 square feet and a total excavation depth of approximately 12 feet, the in-place volume of soil proposed to be excavated, not including additional soil excavation associated with sloping the excavation sidewalls, is estimated to be approximately 1,500 bank cubic yards. The final limits of the excavation will be determined based upon a comparison of additional sample analyses collected during implementation of remedial actions with the soil target cleanup goals.

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Soil excavation will be conducted using a track-mounted excavator or rubber-tired backhoe. The excavated soil will either be temporarily placed on and covered with plastic sheeting or placed in lined, covered, roll-off bins and stored on-site pending characterization for off-site disposal and/or recycling or on-site reuse as clean fill material. An effort will be made during excavation activities to segregate minimally impacted soil (soil potentially suited for reuse as on-site fill) from more heavily impacted soil (soil potentially requiring off-site disposal and/or recycling). Soil segregation will be accomplished utilizing one or more of the following methods: (1) visual observations made in the field; (2) use of a photoionization detector (PID); (3) immuno-assay or other field tests (i.e., PetroFlag); and/or (4) laboratory chemical analysis.

All soil samples submitted to the laboratory for chemical analysis of extractable hydrocarbons will be prepared for analysis by the laboratory using a silica gel cleanup and analyzed in accordance with U.S EPA Test Method 3630M. The purpose of the silica gel cleanup is to remove naturally occurring biogenic material that could generate false positive analytical results. Soil samples used for off-site disposal and/or recycling profiling purposes will be collected at an approximate frequency of one 4-point composite sample per 500 cubic yards of soil, while soil samples collected to evaluate potential reuse as on-site fill will be collected at an approximate frequency of one 4-point composite sample per 100 cubic yards of soil.

The excavated soil for potential reuse as on-site fill will be analyzed using the modified Toxicity Characteristic Leaching Procedure (TCLP) with deionized water and U.S. EPA Test Method 8015M with a silica gel cleanup (U.S. EPA Test Method 3630M) for TPHg, TPHd, and TPHmo, and the modified TCLP with deionized water and U.S. EPA Test Method 8021B for BTEX. If soluble chemical concentrations in the excavated soil are below the soil target cleanup goals, the soil will be used as backfill for the excavation. Excavated soil for characterization for off-site disposal and/or recycling will be analyzed for total petroleum hydrocarbons using U.S. EPA Test Method 8015M with a silica gel cleanup (U.S. EPA Test Method 3630M) and BTEX using U.S. EPA Test Method 8021B.

Removal of Petroleum Hydrocarbon-Affected Groundwater

The results of the previous site investigations indicate that impacts to groundwater are limited to the vicinity of the former head rig and log ramp. As such, a limited amount of groundwater from within the excavation will be removed to quickly and effectively reduce residual groundwater chemical concentrations. Based upon an areal extent of the excavation bottom of approximately 3,300 square feet and a groundwater depth within the excavation of approximately 1-foot thick, the volume of groundwater to be extracted would be approximately 25,000 gallons; however, the final volume of groundwater extracted for offsite disposal will be determined based upon field observations and/or laboratory analyses during implementation of remedial actions.

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Removal of groundwater will be accomplished using either of the following two methods: (1) the groundwater will be sampled from within the excavation for laboratory analysis and then profiled for off-site disposal and/or recycling, followed by pumping the groundwater from the excavation directly into tanker trucks for subsequent hauling to the appropriate facility; or (2) the groundwater will be pumped from the excavation and temporarily stored in holding tanks pending laboratory analysis and profiling for off-site disposal and/or recycling, followed by pumping the groundwater from the holding tanks into tanker trucks for subsequent hauling to the appropriate facility. Groundwater samples collected from either the excavation or the holding tanks will be analyzed for total petroleum hydrocarbons using U.S. EPA Test Method 8015M with a silica gel cleanup (U.S. EPA Test Method 3630M) and BTEX using U.S. EPA Test Method 8021B for characterization for off-site disposal and/or recycling.

In addition to collecting groundwater samples for disposal and/or recycling profiling purposes, samples of the groundwater from within the excavation will be collected both prior to and following completion of pumping activities to evaluate the effectiveness of the groundwater extraction activities. Groundwater samples collected both prior to and following completion of pumping activities will be analyzed for total petroleum hydrocarbons using U.S. EPA Test Method 8015M with a silica gel cleanup (U.S. EPA Test Method 3630M) and BTEX using U.S. EPA Test Method 8021B. If chemical concentrations encountered in groundwater exceed the cleanup goals after conducting the limited groundwater extraction activities, an evaluation will be performed to determine the viability of instituting additional remedial measures, such as monitored natural attenuation of groundwater.

Post-Removal Verification Sampling and Analysis

After the lateral limits of the excavation have been reached based upon field screening, verification soil samples will be collected from the excavation for laboratory analysis to confirm that the soil target cleanup levels have been achieved. Sidewall samples will be collected at a frequency of approximately one soil sample per 20 linear feet of sidewall. Based on the limits of the proposed excavation, approximately 12 verification soil samples will be collected from the sidewalls.

Soil samples submitted for laboratory chemical analysis from the sidewalls will be collected directly from the sidewalls of the excavation or from a portion of soil in the excavator bucket from depths corresponding to areas exhibiting field indications of potential contamination and/or from depths where previous samples indicated contaminants were present. For each sampling point, a stainless steel sample sleeve will be prepared for submittal to the analytical laboratory by pushing the sample sleeve directly into a freshly exposed surface of soil. The sample sleeve will then be sealed using Teflon sheeting and capped with plastic end caps. Each sample will be labeled for identification, placed in a resealable plastic bag, and immediately

Ms. Jan Goebel
March 25, 2003
Page 8

placed in a chilled, thermally insulated cooler (containing bagged ice or blue ice) for delivery, under chain-of-custody protocol, to a state-certified laboratory.

The sidewall soil samples will be analyzed using the modified TCLP with deionized water and U.S. EPA Test Method 8015M with a silica gel cleanup (U.S. EPA Test Method 3630M) for TPHg, TPHd, and TPHmo, and the modified TCLP with deionized water and U.S. EPA Test Method 8021B for BTEX. If the confirmation sample analyses indicate that the soil target cleanup levels have been achieved, no further excavation will be conducted, and the excavation will be backfilled as described below. If the confirmation sample analyses indicate that the soil target cleanup level for any one of the analytes has not been attained, further excavation will be conducted, to the extent practicable, until the soil target cleanup goal(s) is achieved.

Decontamination Procedures

All equipment contacting excavation materials and groundwater will be cleaned prior to leaving the remediation area. Excavation equipment will be cleaned using a stiff bristled broom or wire brush and, if necessary, a hot water wash or a mild phosphate-free detergent solution followed by a clean water rinse. Verification and disposal characterization sampling equipment will be cleaned with a mild phosphate-free detergent solution and double rinsed with deionized water prior to beginning sampling and between each sample location. Decontamination fluids will be temporarily stored in 55-gallon drums or in the holding tanks with the groundwater removed from the excavation. Decontamination rinsate will be profiled for off-site disposal and/or recycling along with the extracted groundwater.

Excavation Backfilling Procedures

Upon completion of excavation activities, the excavation area will be backfilled using on-site soil, imported select fill material, and/or reusable soil removed from the excavation containing soluble chemical concentrations below the soil target cleanup goals. The backfill material will be placed and compacted in lifts, and the excavation area will be regraded to match the existing grade and promote drainage.

Remedial Action Completion Report

The results of the remedial activities will be presented in a post-remediation report. A Remedial Action Completion Report will be prepared to describe remedial activities and document compliance with this plan. The report will provide the following information:

- A summary of remedial activities and description and basis for deviations, if any, from this work plan;

Ms. Jan Goebel
March 25, 2003
Page 9

The Remedial Action Completion Report will be presented to the RWQCB for review and approval of the project.

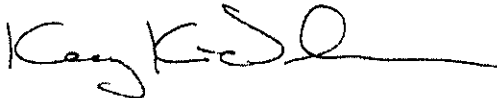
SCHEDULE

Spight proposes to proceed with implementation of this work plan during the Spring or Summer of 2003. The estimated time to complete this scope of work is approximately six to nine weeks. The planning and site preparation activities are anticipated to occur within one to two weeks. The soil excavation and limited groundwater removal activities are anticipated to require approximately two weeks to complete, with up to one to two additional weeks required for sample analyses, excavation backfilling, and off-site disposal and/or recycling of affected soil and groundwater. Upon receipt of the laboratory analytical data, the remedial action completion report is expected to be prepared within three weeks and will be submitted to the RWQCB.

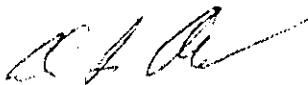
If you have any questions or require additional information regarding this work plan, please call either of the undersigned at (415) 899-1600.

Yours very truly,

PES ENVIRONMENTAL, INC.



Keary Knickerbocker
Project Environmental Scientist



Alan J. Anselmo, P.E.
Associate Engineer

cc: Mr. Robert Sexton, Tyris Corporation
Mr. Keith Howard, Cooper, White & Cooper

Ms. Jan Goebel
March 25, 2003
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Attachments: Table 1 - Summary of Soil Analytical Results - Organic Constituents
Table 2 - Summary of Soil Analytical Results - Inorganic Constituents
Table 3 - Summary of Groundwater Analytical Results - Organic Constituents
Table 4 - Summary of Groundwater Analytical Results - Inorganic Constituents
and Pentachlorophenol
Plate 1 - Vicinity Map
Plate 2 - Site Plan
Plate 3 - Previous Soil Sampling Locations, Analytical Results for Organic
Compounds, and Proposed Area of Excavation
Plate 4 - Previous Groundwater Sampling Locations, Analytical Results for
Organic Compounds, and Proposed Area of Excavation

REFERENCES

- California Regional Water Quality Control Board, North Coast Region (RWQCB), 1993. *Water Quality Control Plan for the North Coast Region*. December 9.
- PES Environmental, Inc. (PES), 2000. *Soil and Groundwater Investigation, Louisiana-Pacific Corporation, Sawmill Property, Cloverdale, California*. August 14.
- SHN Consulting Engineers and Geologists (SHN), 1995. *Phase I Environmental Site Assessment, Louisiana-Pacific Corporation Cloverdale Sawmill and Truck Shop Properties, Cloverdale, California*. June.
- SHN, 1997. *L-P Cloverdale Sawmill and Truck Shop Report of Investigation Summary and Remediation Work Plan*. May 12.

Table 1
Summary of Soil Analytical Results - Organic Constituents
Former Louisiana-Pacific Corporation Facility
Cloverdale, California

Boring/Sample Designation	Date Sampled	Sample Depth (feet bgs)	TPHg (mg/kg)	TPHd (mg/kg)	TPHmo (mg/kg)	Benzene (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Xylenes (mg/kg)	Other VOCs
SW-1	02/06-08/1996	2	na	1	29	na	na	na	na	na	na
SW-3	02/06-08/1996	4.0	na	2.5	63	na	na	na	na	na	na
SW-4	02/06-08/1996	4	na	<1.0	<10	na	na	na	na	na	na
SW-5	02/06-08/1996	5	na	<1.0	<10	na	na	na	na	na	na
SW-6	02/06-08/1996	3.5	na	<1.0	<10	na	na	na	na	na	na
SW-7	02/06-08/1996	14	na	3	27	na	na	na	na	na	na
SW-8	02/06-08/1996	12	na	10	160	na	na	na	na	na	na
SW-9	02/06-08/1996	3	na	190	1300	na	na	na	na	na	na
SW-10	02/06-08/1996	1.5	na	10	72	na	na	na	na	na	na
SW-11	02/06-08/1996	2	na	<1.0	<10	na	na	na	na	na	na
SW-12	02/06-08/1996	3	na	<1.0	17	na	na	na	na	na	na
SW-13	02/06-08/1996	2.5	na	<1.0	37	na	na	na	na	na	na
SW-14	02/06-08/1996	2.5	na	58	1600	na	na	na	na	na	na
SW-15	02/06-08/1996	1.5	na	2.5	29	na	na	na	na	na	na
SW-16	02/06-08/1996	5	na	<1.0	<10	na	na	na	na	na	na
SW-17	02/06-08/1996	5	na	<1.0	<10	na	na	na	na	na	na
SW-18	02/06-08/1996	5	<1.0	<1.0	<10	<0.010	<0.010	<0.010	<0.010	<0.010	na
SW-19	02/06-08/1996	4.5	<1.0	<1.0	<10	<0.010	<0.010	<0.010	<0.010	<0.010	na
SW-20	02/06-08/1996	4	na	<1.0	<10	na	na	na	na	na	na
SW-21	02/06-08/1996	4.5	na	<1.0	<10	na	na	na	na	na	na
SMSCP-101	09/16-19/1996	4.0	na	<1.0	<10	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	nd ⁽¹⁾
SMSCP-102	09/16-19/1996	4.0	na	<1.0	<10	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	nd ⁽¹⁾
SMSCP-103	09/16-19/1996	3.75	na	4	130	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	nd ⁽¹⁾
SMSCP-104	09/16-19/1996	4.0	na	<1.0	<10	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	nd ⁽¹⁾
SMSCP-105	09/16-19/1996	3.5	na	8.5	54	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	nd ⁽¹⁾
SMHR-101	09/16-19/1996	4.0	na	38	120	na	na	na	na	na	na
SMHR-102	09/16-19/1996	4.0	na	23	150	na	na	na	na	na	na
SMHR-103	09/16-19/1996	4.0	na	6.3	74	na	na	na	na	na	na
SMHR-104	09/16-19/1996	5.5	na	760	3300	na	na	na	na	na	na
SMHR-105	09/16-19/1996	5.0	na	1000	12000	na	na	na	na	na	na
SMHR-106	09/16-19/1996	4.0	na	56	110	na	na	na	na	na	na
SMHR-107	09/16-19/1996	5.0	na	2.6	35	<0.050	<0.050	<0.050	<0.050	<0.050	nd ⁽¹⁾
SMOS-101	09/16-19/1996	4.4	na	<1.0	<10	na	na	na	na	na	na
SMOS-102	09/16-19/1996	4.0	na	<1.0	<10	na	na	na	na	na	na
SMOS-103	09/16-19/1996	7.0	na	13	400	na	na	na	na	na	na
SMHOS-101	09/16-19/1996	2.0	na	19	260	na	na	na	na	na	na
SMHOS-102	09/16-19/1996	3.5	na	<1.0	12	na	na	na	na	na	na
Oil Storage	09/16-19/1996	9.0	na	16	300	na	na	na	na	na	na
SMS-101	09/16-19/1996	2.5	na	<1.0	<10	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	nd ⁽¹⁾
VCB-1-6	2/24/2000	6	<1.00	<10.0	na ⁽²⁾	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	nd
VCB-1-8.5	2/24/2000	8.5	<1.00	<10.0	na ⁽²⁾	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	nd
VCB-2-6	2/24/2000	6	7.51	30,500	na ⁽²⁾	<0.0100	92	0.092	0.0104	0.0722	nd ⁽³⁾
VCB-3-10.5	2/24/2000	10.5	23.6	7,040	na ⁽²⁾	<0.0100	12	0.012	<0.0100	<0.0100	nd
VCB-7-4	2/24/2000	4	<1.00	<10.0	na ⁽²⁾	<0.000500	0.6	0.0006	<0.000500	<0.000500	nd
VCB-7-8	2/24/2000	8	<1.00	<10.0	na ⁽²⁾	<0.000500	0.85	0.00085	<0.000500	<0.000500	nd
VCB-8-6	2/24/2000	6	<1.00	<10.0	na ⁽²⁾	<0.000500	0.56	0.00056	<0.000500	<0.000500	nd
VCB-8-7.5	2/24/2000	7.5	<1.00	<10.0	na ⁽²⁾	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	nd
VCB-9-5	2/24/2000	5	<1.00	<10.0	na ⁽²⁾	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	nd
VCB-9-8.5	2/24/2000	8.5	<1.00	<10.0	na ⁽²⁾	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	nd

Notes:

TPHd = Total petroleum hydrocarbons quantified as diesel
 TPHg = Total petroleum hydrocarbons quantified as gasoline
 TPHmo = Total petroleum hydrocarbons quantified as motor oil
 mg/kg = milligrams per kilogram
 µg/kg = micrograms per kilogram
 na = not analyzed
 nd = not detected at or above respective laboratory reporting limits
 <1.0 = compound not detected at or above the specified laboratory reporting limit
 bgs = below ground surface
 VOCs = volatile organic compounds

Samples were analyzed by EPA Test Method 8015 Modified for TPHg, TPHd, and TPHmo and for VOCs by EPA Test Methods 602, 8021, and/or 8260. All other chlorinated and volatile organic compounds were not present at or above respective laboratory reporting limits.

- (1) = The sample was also analyzed for methyl tertiary butyl ether (MTBE), and the results indicate that MTBE was not detected at or above the laboratory reporting limit of 0.050 µg/kg.
 (2) = According to the analytical laboratory, the TPHd analysis includes petroleum hydrocarbons in the motor oil range (TPHmo).
 (3) = Detections of VOCs include: isopropylbenzene at 114 µg/kg; n-propylbenzene at 211 µg/kg; 1,3,5-trimethylbenzene at 246 µg/kg; 1,2,4-trimethylbenzene at 670 µg/kg; sec-butylbenzene at 356 µg/kg; 4-isopropyltoluene at 426 µg/kg; n-butylbenzene at 362 µg/kg; and naphthalene at 23.4 µg/kg.

Table 2
Summary of Soil Analytical Results - Inorganic Constituents
Former Louisiana-Pacific Corporation Facility
Cloverdale, California

Boring/Sample Designation	Date Collected	Sample Depth (feet bgs)	Arsenic (mg/kg)	Chromium (mg/kg)	Cadmium (mg/kg)	Nickel (mg/kg)	Zinc (mg/kg)	Lead (mg/kg)
SMSCP-103	09/16-19/1996	3.75	na	56	<2.0	75	87	16
SMHR-104	09/16-19/1996	5.5	na	46	<2.0	52	47	13
SMHR-105	09/16-19/1996	5.0	na	77	<2.0	88	55	13
SMOS-103	09/16-19/1996	7.0	na	110	<2.0	110	56	4.9
VCB-1-6	2/24/2000	6	<5.0	89	na	na	na	na
VCB-1-8.5	2/24/2000	8.5	<5.0	65.8	na	na	na	na
VCB-2-6	2/24/2000	6	<5.0	6.8	na	na	na	na
VCB-3-10.5	2/24/2000	10.5	<5.0	39.2	na	na	na	na
VCB-7-4	2/24/2000	4	<5.0	45.2	na	na	na	na
VCB-7-8	2/24/2000	8	<5.0	95.1	na	na	na	na
VCB-8-6	2/24/2000	6	<5.0	73.2	na	na	na	na
VCB-8-7.5	2/24/2000	7.5	<5.0	61.1	na	na	na	na
VCB-9-5	2/24/2000	5	<5.0	39.0	na	na	na	na
VCB-9-8.5	2/24/2000	8.5	<5.0	53.4	na	na	na	na
Background ⁽¹⁾			60	180	na	na	na	na

Notes:

feet bgs = feet below ground surface

mg/kg = milligrams per kilogram

<5.0 = compound not detected at or above the stated laboratory reporting limit

na = not analyzed/not applicable

Samples collected during the September 1996 sampling event were analyzed by EPA Test Method 200.7.

Samples collected during the February 2000 sampling event were analyzed by EPA Test Method 3050/6020.

(1) Background concentrations for nearby Masonite facility, per OHM, *Groundwater Remediation Plan*, March 1995.

Table 3
Summary of Groundwater Analytical Results - Organic Constituents
Former Louisiana-Pacific Corporation Facility
Cloverdale, California

Boring/Sample Designation	Date Collected	TPHg (mg/l)	TPHd (mg/l)	TPHmo (mg/l)	Benzene (µg/l)	Toluene (µg/l)	Ethylbenzene (µg/l)	Total Xylenes (µg/l)	Other VOCs
WP-SW105	09/16-19/1996	na	<0.050	<0.500	<1.0	<1.0	<1.0	<1.0	na
WP-SWHR104	09/16-19/1996	na	<0.050	<0.500	<1.0	0.78	<1.0	<1.0	na
VCB-1	2/24/2000	<0.050	<0.050	na ⁽¹⁾	<0.500	0.51	<0.500	<0.500	nd
VCB-2	2/24/2000	<0.050	15.3	na ⁽¹⁾	<0.500	<0.500	<0.500	<0.500	nd
VCB-3	2/24/2000	50.6	1,290	na ⁽¹⁾	<10.0	<10.0	<10.0	<10.0	nd
VCB-7	2/24/2000	<0.050	<0.050	na ⁽¹⁾	<0.500	0.63	<0.500	<0.500	nd
VCB-9	2/24/2000	<0.050	<0.050	na ⁽¹⁾	<0.500	<0.500	<0.500	<0.500	nd

Notes:

TPHg = Total petroleum hydrocarbons quantified as gasoline

TPHd = Total petroleum hydrocarbons quantified as diesel

TPHmo = Total petroleum hydrocarbons quantified as motor oil

mg/l = milligrams per liter

µg/l = micrograms per liter

<0.050 = compound not detected at or above the stated laboratory reporting limit

na = not analyzed

nd = not detected at or above respective laboratory reporting limits

VOCs = volatile organic compounds

Samples were analyzed by EPA Test Method 8015 Modified for TPHg, TPHd, and TPHmo, and for VOCs by EPA Test Method 8260.

All other chlorinated and volatile organic compounds were not present at or above respective laboratory reporting limits.

(1) = According to the analytical laboratory, the TPHd analysis includes petroleum hydrocarbons in the motor oil range (TPHmo).

Table 4
Summary of Groundwater Analytical Results - Inorganic Constituents and Pentachlorophenol
Former Louisiana-Pacific Corporation Facility
Cloverdale, California

Boring/Sample Designation	Date Collected	Pentachlorophenol (µg/l)	Arsenic (µg/l)	Chromium (µg/l)
VCB-1	2/24/2000	<60.0	<2.00	7.17
VCB-2	2/24/2000	<64.0	19.3	9.61
VCB-3	2/24/2000	<77.0	17.1	39.1
VCB-7	2/24/2000	<100	<2.00	5.52
VCB-9	2/24/2000	<77.0	<2.00	4.46

Notes:

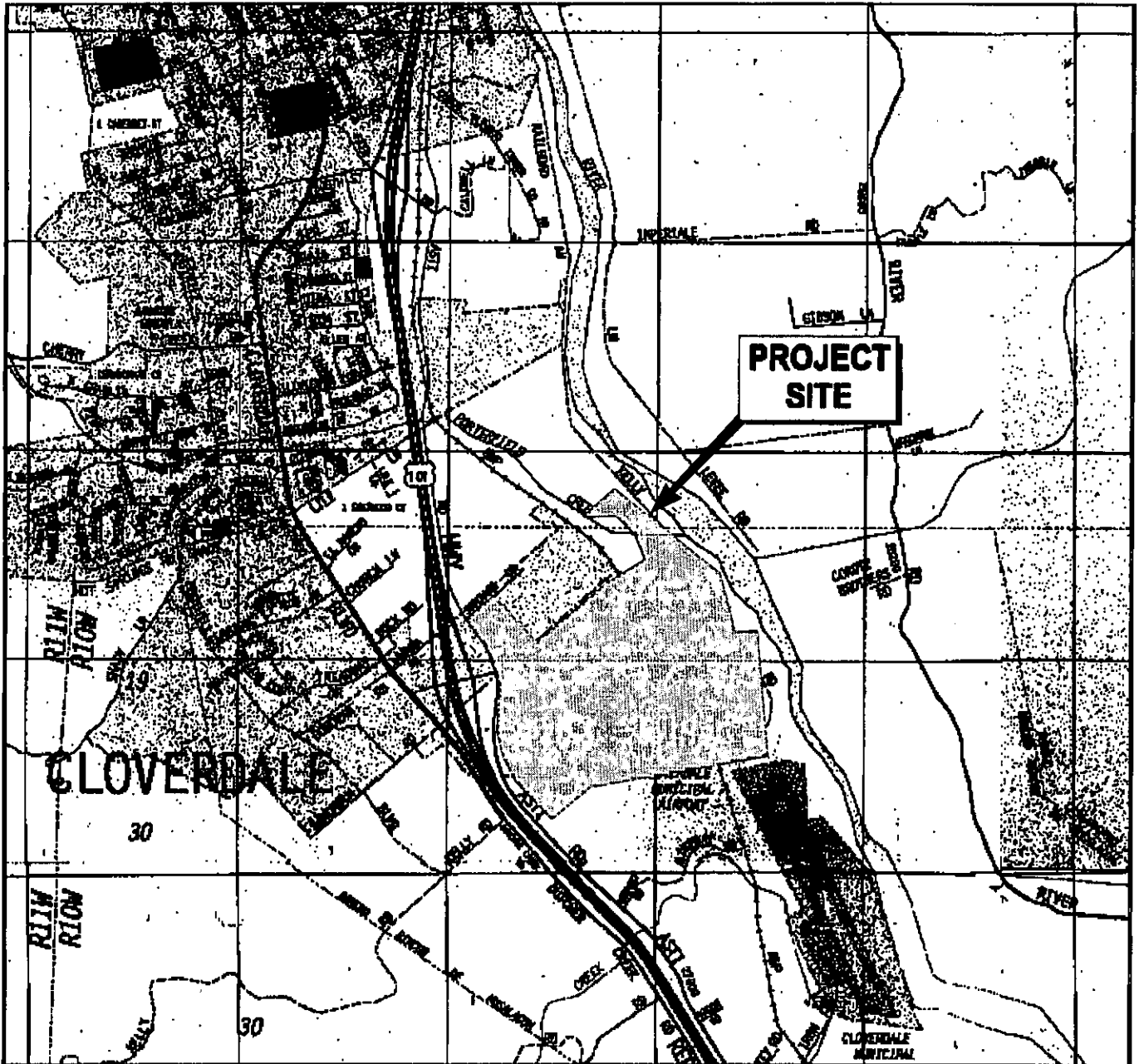
µg/l = micrograms per liter

<60.0 = compound not detected at or above the stated laboratory reporting limit

Samples were analyzed for Pentachlorophenol by EPA Test Method 8270.

Samples were analyzed for Arsenic and Chromium by EPA Test Method 200.8.

PLATES

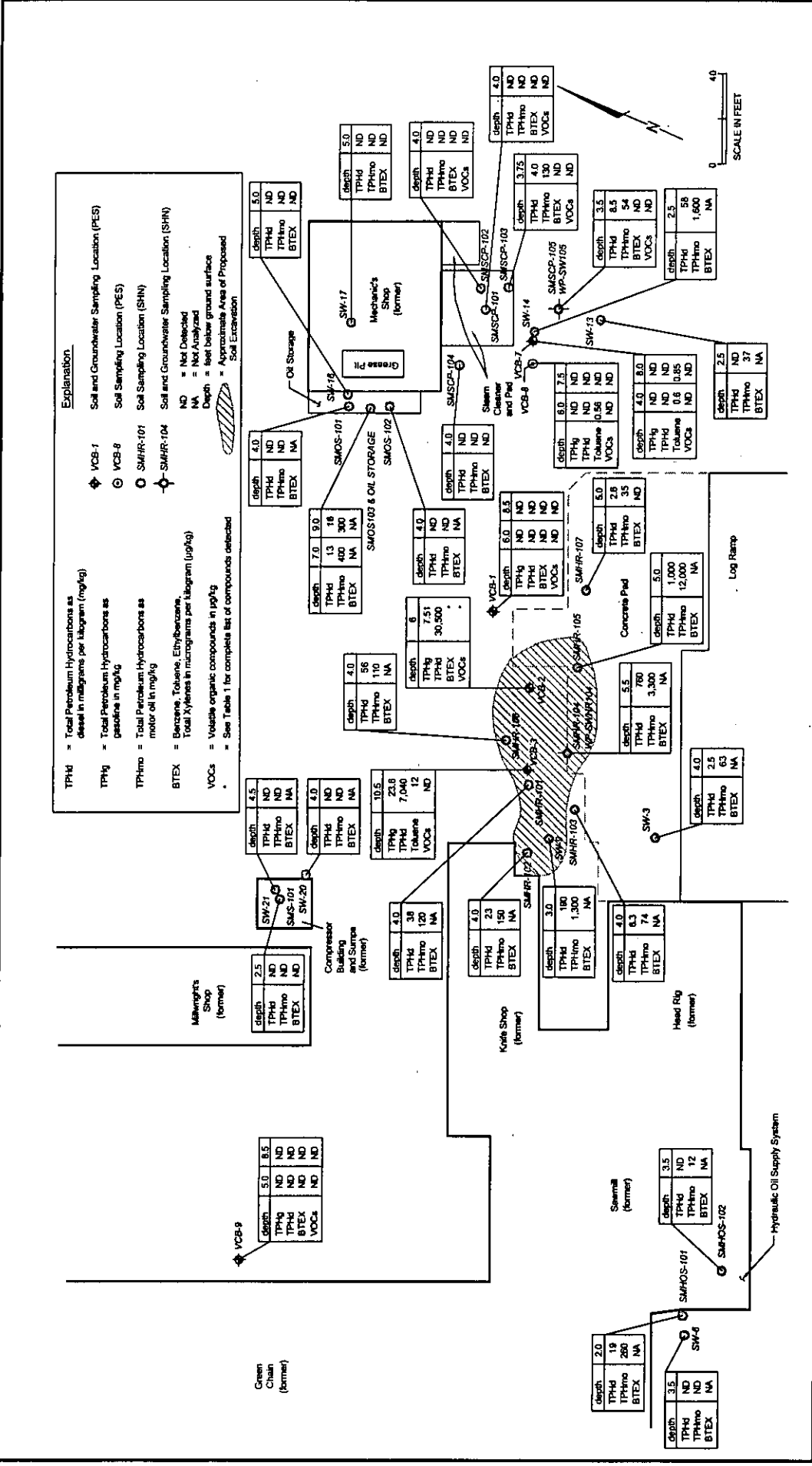


Ref: "The Thomas Guide- Napa and Sonoma County Street Guide and Directory" 2001 Edition



Vicinity Map
 Former Louisiana-Pacific Corporation Facility
 Cloverdale, California

PLATE
1



TPHd = Total Petroleum Hydrocarbons as diesel in milligrams per kilogram (mg/kg)
TPHg = Total Petroleum Hydrocarbons as gasoline in mg/kg
TPHmo = Total Petroleum Hydrocarbons as motor oil in mg/kg
BTEX = Benzene, Toluene, Ethylbenzene, Total Xylenes in micrograms per kilogram (µg/kg)
VOCs = Volatile organic compounds in µg/kg
 * See Table 1 for complete list of compounds detected

Explanation
 Soil and Groundwater Sampling Location (PES)
 Soil Sampling Location (PES)
 Soil Sampling Location (SHN)
 Soil and Groundwater Sampling Location (SHN)
 ND = Not Detected
 NA = Not Analyzed
 Depth = feet below ground surface
 [Hatched Area] = Approximate Area of Proposed Soil Excavation

Previous Soil Sampling Locations, Analytical Results for Organic Compounds, and Proposed Area of Excavation
 Former Louisiana-Pacific Corporation Facility
 Cloverdale, California





April 11, 2003

829.001.01.002

California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, #A
Santa Rosa, California 95403

Attention: Ms. Terri Kinney

WORK PLAN

**PILOT TEST OF THE WOOD WASTE LANDFILL CLEAN CLOSURE PROCESS
FORMER LOUISIANA-PACIFIC CORPORATION FACILITY
CLOVERDALE, CALIFORNIA**

Dear Ms. Kinney:

PES Environmental, Inc. (PES) has prepared this work plan on behalf of Spight Properties II, LLC (Spight) for conducting a two-week pilot test of the wood waste landfill clean closure process (pilot test) at the former Louisiana-Pacific Corporation (L-P) sawmill property near Cloverdale in Sonoma County, California (the site; Plate 1). As you know, Spight owns the sawmill property, including the approximately 500,000 cubic yard wood waste landfill located on the site. In order to clean close the landfill, Spight has been evaluating various excavation and processing methodologies and procedures for clean closure of the landfill. Implementation of this work plan will provide data necessary to determine wood waste material excavation, processing, handling and on-site placement and blending equipment productivity. As a result, a more definitive timeline will be established for completion of clean closure activities. Additionally, samples of the wood waste, borrow soils and/or blended materials will be collected for potential physical and/or chemical analyses.

BACKGROUND

The former L-P site is comprised of approximately 251 acres located approximately 2 miles southeast of the City of Cloverdale. A vicinity map showing the location of the property is presented as Plate 1. The wood waste landfill footprint is approximately 22 acres and consists of a western waste unit and an eastern waste unit containing on the order of approximately 400,000 to 600,000 cubic yards of non-hazardous wood chips, bark, sawdust, soil, and rock. A site plan showing the location of the wood waste landfill is presented as Plate 2.

Since its acquisition, and regardless of the future use of the property, Spight has been committed to the clean closure of the disposal site, which in contrast with closure in place for perpetuity, has the benefits of: (1) removing potential future environmental liability associated

Ms. Terri Kinney
April 11, 2003
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with ground water and surface water quality issues; (2) eliminating future monitoring and maintenance activities associated with the disposal site cap and drainage controls; (3) removing the facility from regulatory oversight and eliminating expenditure of future regulatory resources; (4) reusing the materials for beneficial purposes; and (5) preparing the site for future uses.

Because of the non-hazardous characteristics of the materials within the landfill, it is anticipated that the reclaimed processed wood waste will have multiple potential uses including use as a soil amendment/additive throughout the site and sale to outside users including operators of boilers and landscapers. The processed materials can be incorporated with clean fill and used as fill for low-lying portions of the site. Excess materials recovered during the processing of the wood waste landfill may also be made available for purchase by outside markets. Previous wood waste characterization data collected from the site indicate that 100 percent processed wood waste materials are suitable for use as a soil amendment/additive throughout the site (PES, 2000). A detailed description of the site characteristics and proposed clean closure plan is presented in PES' *Draft Report of Waste Discharge* (draft RWD) dated February 6, 2003 (PES, 2003), which was previously submitted for review to the California Regional Water Quality Control Board, North Coast Region (RWQCB) and the Sonoma County Environmental Health Department.

PROPOSED SCOPE OF WORK

The scope of work for the pilot test includes the following activities: (1) field preparation activities; (2) excavation of borrow material from the former sawmill area; (3) wood waste landfill excavation and processing activities; (4) placement, blending and compaction of the processed wood waste and borrow material; (5) sampling and analysis of materials; and (6) evaluation of the pilot test and reporting. These tasks are described in detail below.

Task 1 - Field Preparation Activities

Prior to implementation of this work plan, any necessary grading permits from the County of Sonoma will be obtained. Before processing equipment is mobilized to the proposed processing area, a processing pad will be excavated and leveled. The processing pad will cover an area of approximately 22,500 square feet (150 feet by 150 feet). Although unlikely due to the proposed schedule for performing the work during the summer of 2003, surface water that may collect on the processing area will be diverted to the closest existing sedimentation basin. The locations of the sedimentation basins and processing pad area are shown on Plate 3.

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Task 2 – Excavation of Borrow Material

As indicated above, the previous wood waste characterization data supports utilizing the processed wood waste materials as a soil amendment/additive throughout the site without the addition of blending soils. However, to further protect groundwater or surface water quality, a conservative 1:1 blending ratio of processed wood waste to on-site borrow soil will be utilized for performing this pilot test. The borrow material required for blending with the processed wood waste will be excavated from the former sawmill complex log deck area and stockpiled nearby prior to commencing the two-week pilot test (Plate 3). The borrow material area will be excavated to a depth of approximately 4 to 5 feet below the existing ground surface over an anticipated area of approximately 50,000 to 60,000 square feet, based on the anticipated wood waste processing rates, as described in more detail below. However, the final excavation area will be determined in the field based upon the actual wood waste processing productivity achieved. The borrow material excavation will then be backfilled using a 1:1 blend of processed wood waste material generated during the two-week pilot test with the previously excavated, stockpiled borrow soil, as discussed in more detail below.

Task 3 – Wood Waste Landfill Excavation and Processing Activities

The principal method for the clean closure of the landfill will be to recycle the recovered wood waste materials by blending the processed materials with on-site soils and subsequently using this blended mix of materials as fill for low-lying portions of the site. The clean closure process involves excavating and separating the wood waste materials based on size using a screening process followed by utilizing the recovered materials. In order to simulate the clean closure process and collect realistic performance data, the pilot study will be conducted over a two-week period, consisting of 8-hour workdays, five days per week. The processing rate of the wood waste material during the pilot test is anticipated to be approximately 100 cubic yards per hour, for a total volume of approximately 8,000 cubic yards of wood waste material over the two-week pilot test. However, the final processing rate and total volume of processed wood waste will be determined in the field based upon the actual wood waste processing productivity achieved.

Wood waste material for the pilot test will be excavated from the eastern wood waste unit (Plate 3). Prior to beginning excavation activities, the existing landfill cover materials will be removed from a portion of the eastern waste unit and stockpiled nearby. Following removal of the landfill cover, wood waste material will be excavated from the eastern wood waste unit using an excavator or bulldozer and processed utilizing screening equipment at the processing pad area, as shown on Plate 3. After processing, the material will be transported to the former sawmill complex log deck area for placement, blending and compaction. Upon completion of the pilot test, the landfill cover material will be replaced and compacted over the portion of the landfill exposed during the pilot test.

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April 11, 2003
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Health and Safety Monitoring

In addition to standard health and safety practices that will be implemented during site work, a gas-monitoring program will be employed at the site during the course of the pilot test to protect site workers, public health and the environment. Monitoring at the site of excavation, the processing pad area and the placement, blending and compaction location will be performed by qualified personnel to ensure that gas concentrations do not create hazardous operating conditions.

Portable gas monitoring equipment such as a Lower Explosive Limit (LEL) meter, flame-ionization detector (FID) or infrared gas analyzer will be used to monitor methane concentrations on periodic basis. Additionally, a photoionization detector (PID) or FID will be used to monitor the air for possible volatile organic compounds (VOCs) on a periodic basis.

Task 4 - Placement, Blending and Compaction of Processed Wood Waste and Borrow Material

Layers of borrow soil and processed wood waste materials will be placed in equal, loose lifts up to 12 inches in combined thickness, blended and compacted in-place. Compaction will be accomplished using a self-propelled, segmented wheel compactor. It is estimated, based on expected processing rates (as discussed above), that the blended material will be placed to a finish height of approximately 4 to 5 feet above grade over the entire footprint of the borrow soil excavation area.

Task 5 - Sampling and Analysis Plan

While the blending ratio of processed wood waste materials with on-site soils is not expected to exceed 1:1, sampling and analysis of various blending ratios of processed wood waste materials and on-site borrow soil will be conducted during the pilot test to determine the appropriate final mixing ratio for use during clean closure of the landfill. Samples collected for chemical analyses will be collected in pre-cleaned containers, labeled, and placed in a chilled cooler for transport to a State of California certified analytical laboratory under chain-of-custody protocol. The blended wood waste and soil samples will be analyzed for the following wood preserving contaminant indicators: (1) pentachlorophenol by U.S. EPA Test Method 8270; and (2) arsenic and chromium by U.S. EPA Test Method 200.8. Analytical results will be compared to the applicable U.S. EPA Region 9 Preliminary Remediation Goals (PRGs). If PRGs are exceeded, solubility tests may be performed on the samples and the results will then be compared to applicable water quality objectives for the region.

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Additionally, the blended mix of processed wood waste materials and on-site borrow soil may be sampled upon completion of placement and compaction activities to assess final in-place physical or chemical characteristics. The final in-place materials may be analyzed to determine compaction, moisture content, organic content, and/or other physical or chemical properties.

Task 6 - Pilot Test Evaluation and Reporting

Following completion of field activities, production rates will be evaluated to assess the efficiency of the wood waste processing equipment. Additionally, any physical or chemical sample analyses from the pilot test will be reviewed. The results of the pilot test activities will be presented to the RWQCB in a brief letter report.

SCHEDULE

Spight proposes to proceed with implementation of this work plan during the months of July and/or August 2003. The estimated time to complete the fieldwork outlined in this workplan is approximately three weeks. The field preparation activities (Task 1) and borrow material excavation activities (Task 2) are expected to be completed in one week prior to beginning the pilot test. Wood waste landfill excavation, processing, and blending activities (Task 3) and placement, blending, and compaction activities (Task 4) are anticipated to be conducted within a two-week period. Laboratory sample analyses will require an additional one to two weeks (Task 5). The results of the pilot test will be evaluated and a brief letter report summarizing the results will be submitted to the RWQCB within one month following completion of field activities (Task 6).

We trust this work plan provides you with the information required at this time and meets your approval. If you have any questions or require additional information, please call either of the undersigned at (415) 899-1600.

Yours very truly,

PES ENVIRONMENTAL, INC.

Original Signed by Keary Knickerbocker

Keary Knickerbocker
Project Environmental Scientist

Original Signed by Alan J. Anselmo

Alan J. Anselmo, P.E.
Associate Engineer

Ms. Terri Kinney
April 11, 2003
Page 6

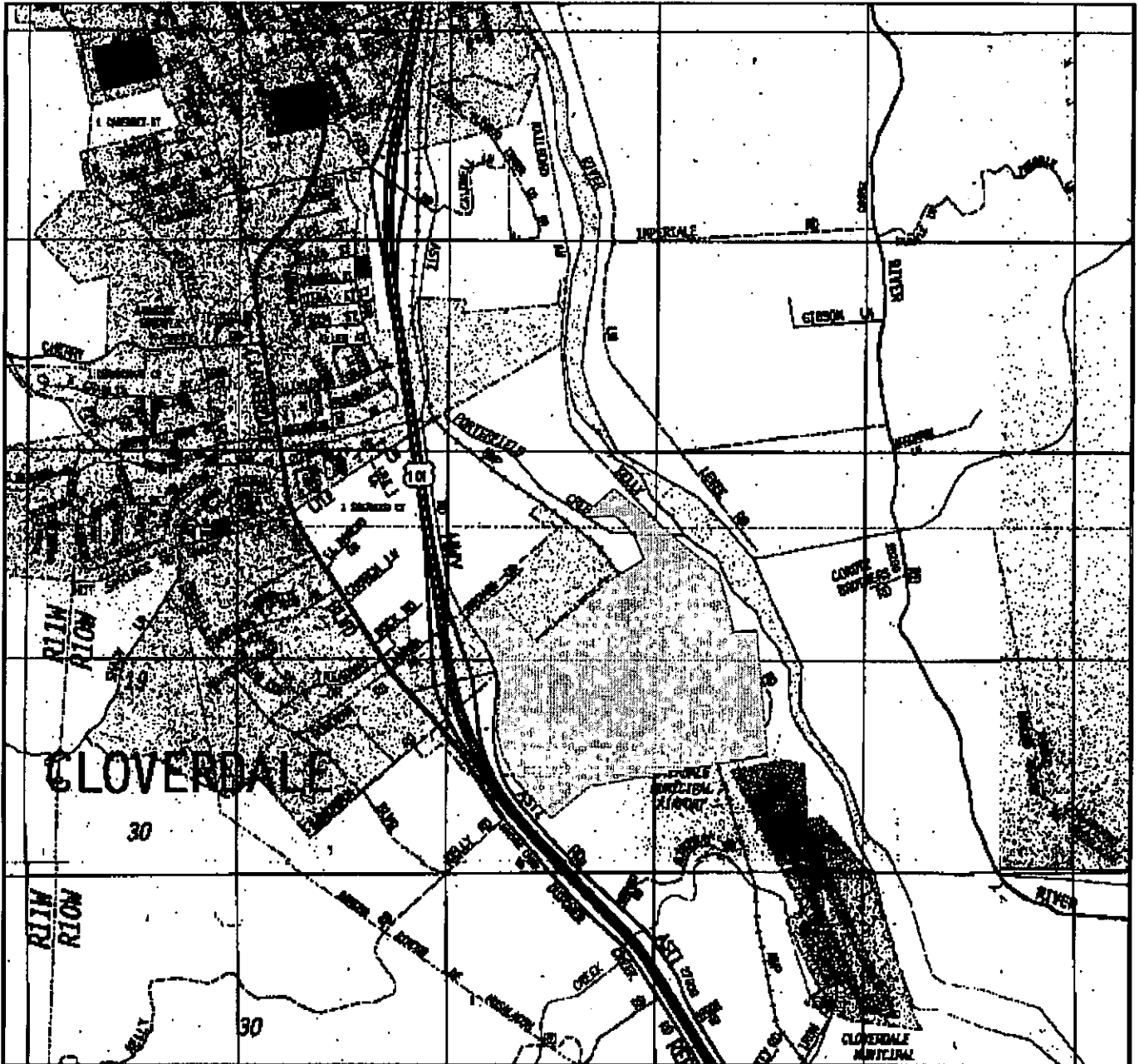
Attachments: Plate 1 - Vicinity Map
Plate 2 - Site Map
Plate 3 - Pilot Test Site Features

cc: Mr. Robert Sexton, Tyris Corporation
Mr. Keith Howard, Cooper, White & Cooper
Mr. Bob Swift, Sonoma County Environmental Health Department

REFERENCES

PES Environmental Inc. (PES), 2000. *Wood Waste Landfill Characterization Report, Wood Waste Disposal Site, Louisiana-Pacific Corporation Facility, Cloverdale, California.* April 14.

PES, 2003. *Draft Report of Waste Discharge, Wood Waste Landfill, Former Louisiana-Pacific Corporation Facility, Cloverdale, California.* February 6.



Ref: "The Thomas Guide- Napa and Sonoma County Street Guide and Directory" 2001 Edition



Vicinity Map
Former Louisiana-Pacific Corporation Facility
Cloverdale, California

PLATE
1



Legend

- Approximate Site Boundary
- - - - - Approximate Extent of Existing Waste Placement
- Sedimentation Basin
- ▨ Proposed Processing Pad Area
- Surface Water Flow Direction
- ▤ Proposed Area from which Borrow Material will be Excavated, and Processed Wood Waste Materials Blended with Borrow Materials will be Placed and Compacted

Pilot Test Site Features
 Former Louisiana-Pacific Corporation Facility
 Cloverdale, California

PES Environmental, Inc.
 Engineering & Environmental Services



California Regional Water Quality Control Board North Coast Region



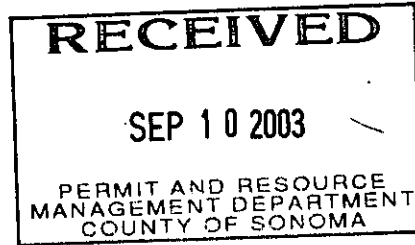
Winston H. Hickox
Secretary for
Environmental
Protection

William R. Massey, Chairman

Gray Davis
Governor

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

September 9, 2003



Mr. Robert H. Sexton
Tyris Corporation
1220 Diamond Way, Suite. 100
Concord, CA 94520

Dear Mr. Sexton:

Subject: Former LP-Cloverdale WWDS, Pilot Test Work Plan/Addendum No. 1 and General Industrial Storm Water NPDES Notice of Intent

File: Former LP-Cloverdale WWDS, 100 Kelly Road, Cloverdale, Sonoma County, Landfill, WDID No. 1B84064OSON

We have received and reviewed the PES Environmental Work Plan/Addendum No.1 and Notice of Intent for coverage under the General Industrial Storm Water Permit. The submitted plans outline a short-duration pilot project for reclaiming and screening waste sawmill materials contained within the Former LP-Cloverdale landfill. After the waste materials are processed, Tyris will determine the nature and extent of any re-usable soil amendment for the greater golf course development project. We concur with the submitted plans, with the following changes:

1. Soil leachability for pentachlorophenol, tetrachlorophenol and the full range of semivolative organic compounds (SVOCs) will be conducted using low-level detection limits. Field and chemical analyses will be performed on processed materials, from which unsuitable or contaminated materials, inappropriate for use with this project, have been screened. Please be advised that any field-generated wastes and contaminated materials must be properly disposed of at a legal point of disposal.
2. Landfill projects are required to have coverage under the General Industrial Storm Water NPDES Permit. You have submitted a Notice of Intent (NOI) for coverage under this permit to the State Water Resources Control Board Storm Water Unit in Sacramento. You should be receiving your processed NOI and unique permit identification number from that department soon. Thank you for providing me with a copy of the NOI application.

California Environmental Protection Agency

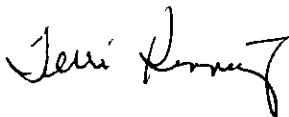


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3. The General Industrial Storm Water NPDES Permit requires that you develop a Storm Water Pollution Prevention Plan (SWPPP) to address landfill and construction related storm water concerns. You will need to submit a copy of the SWPPP to this office and to the Sonoma County Permit and Resource Management Department, attention Kevin Doble, concurrent with project implementation. Prior to the rainy season, you will need to ensure that all necessary erosion control materials are available on-site for use in accordance with the plan.
4. The monitoring wells associated with the Masonite/IP groundwater investigation and remediation project are near the proposed excavation site for the pilot project. Please ensure that these wells are properly protected from earthmoving equipment.
5. The plan indicates that following the pilot test excavation work, you will recontour and place adequate intermediate cover. Intermediate cover is to be compacted earthen material of at least 1 foot thick placed on all fill surfaces to minimize percolation. Please note that throughout the rainy season, you will need to regularly inspect the landfill slopes, in accordance with WDR Order No. 84-64, in order to identify potential (or actual) erosion control, slope stability problems or leachate seep development. In the event that you identify a problem, you will need to implement appropriate corrective actions.
6. Please incorporate all conclusion and recommendations from this pilot project into a report of field activities and submit a copy of the report to this office.

We appreciate your cooperation in developing this pilot project and we look to working with you on the landfill closure and project development plans. If you have any questions or concerns regarding this matter, please feel free to contact me at (707) 576-2668.

Sincerely,



Terri Kinney
Engineering Geologist

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California Environmental Protection Agency



Recycled Paper



**California Regional Water Quality Control Board
North Coast Region
Beverly Wasson, Chairperson**



Alan C. Lloyd, Ph.D.
Agency Secretary

<http://www.waterboards.ca.gov/northcoast>
5550 Skylarc Boulevard, Suite A, Santa Rosa, California 95403
Phone: 1 (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Arnold
Schwarzenegger
Governor

March 17, 2005

State Clearinghouse
Attention Scott Morgan
1400 Tenth Street, Room 222
Sacramento, CA 95814

Dear Mr. Morgan:

Subject: Comments on Mitigated Negative Declaration, SCH 2005022080

File: Former Louisiana-Pacific Sawmill and Landfill, Cloverdale

Regional Water Board staff has reviewed the Mitigated Negative Declaration on the proposed remediation of the woodwaste landfills at the former Louisiana-Pacific Facility in Cloverdale. The proposal calls for placement of the processed woodwaste on the former log deck and sawmill (Fill and Borrow Area 1) where residual soil contamination with petroleum hydrocarbons exists. The processed woodwaste would be mixed with soils on the log deck and mill site, and placed as fill material. Soils will be removed from approximately one half of the Borrow Area 1, mixed with woodwaste, and then placed and graded back to where it came from.

Residual soils contaminated with total petroleum hydrocarbons as motor oil and diesel remains in the area of the former head rig. The contamination left in place is at depths greater than five feet, with a few exceptions at location ES-12-3.0, ES-02-4.0, and ES-01-4.0. At locations ES-12-3.0, ES-02-4.0, and ES-01-4.0, total petroleum hydrocarbons as diesel were detected at 2.5, 3.6, and 3.4 mg/kg, respectively. The excavation of borrow soils should not be below five feet in these areas. The operations plan needs to identify the areas where digging below five feet is prohibited. Once the project is completed, groundwater monitoring wells are required to evaluate the impacts to groundwater from the contamination in this area.

The Borrow and Fill Area No. 1 and Borrow Area No. 2 should be screened using visual inspection and organic vapor analysis using a FID or PID. The visual inspection and organic vapor analysis should be conducted by someone with experience in this field. The person/persons responsible should be identified in the operations plan along with their qualifications. This property is an old industrial site where contamination could be discovered

State Clearinghouse

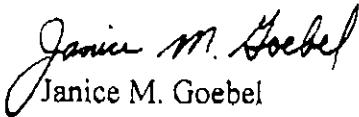
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March 17, 2005

when excavating such a large area. A plan for removal, characterization and disposal of contamination discovered should be in place prior to commencement of the project.

If you have any questions, please call me at (707) 576-2676.

Sincerely,



Janice M. Goebel
Sanitary Engineering Associate

031705_JMG_tmk_woodwaste

cc: CIWMB, Closure Branch
Sonoma County Environmental Health Dept., LEA, Robert Swift, 475 Aviation Boulevard,
220, Santa Rosa, CA 95403
Michelle McCarthy, Tyris Corporation, 1220 Diamond Way, Suite 100,
Concord, CA 94520
Nick Chase, Sonoma County PRMD, 2550 Ventura Avenue, Santa Rosa, CA 95403
Alan Anselmo, PES Environmental, 1682 Novato Boulevard, Suite 100,
Novato, CA 94947-7021
Bruce Kibby, City of Cloverdale, 126 North Cloverdale Boulevard, Cloverdale, CA 95425
Baseline Environmental Consulting, 5900 Hollis Street, Suite D, Emeryville, CA 94608
Mr. John Wanger, City Engineer, City of Cloverdale, P.O. Box 217,
Cloverdale, CA 95425