

Morrison, Gina@Waterboards

From: April Ingram <April.Ingram@lpcorp.com>
Sent: Wednesday, October 12, 2016 8:39 AM
To: Morrison, Gina@Waterboards
Subject: Draft WDR for Samoa Class III SWDS

Hi, Gina. I have a comment for the draft WDR R1-2017-0001 that is currently out for public notice. A correction needs to be made on p. 5 under "Groundwater," in paragraph 30. The fourth sentence says MW-2 is located southeast of the landfill, but this should instead be southwest.

Also, the Section 48 signatory requirement (c) requires a lengthy certification statement to be on every required document. It may not be a big deal, and might not be enforced against, but this is contradictory to the financial assurance submittal requirements, which mandate the precise wording as specified in the regs for each financial instrument, and which do not include the certification text. Like I said, it may not be a big deal.

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Morrison, Gina@Waterboards

From: Bob Simpson <simpsonbob@live.com>
Sent: Thursday, September 29, 2016 3:41 PM
To: Morrison, Gina@Waterboards
Subject: RE: Samoa SWDS

Hi Gina: The property Charles is speaking with you about no longer belongs to Freshwater Tissue. That parcel belongs exclusively to Charles and Jan Benbow. Freshwater distributed its two remaining parcels. The office complex and approx. 22 acres went to Charles. The remaining 28.4 acres that includes a chip yard and the former chip screen room was distributed to Robert (me) & Jamie Simpson.

Regards,
Bob

From: Gina.Morrison@waterboards.ca.gov
To: charlesbenbow@gmail.com
CC: gerickson@shn-engr.com; April.Ingram@lpcorp.com; simpsonbob@live.com; jcrider@humboldtby.org; rrueber@shn-engr.com; mfoget@shn-engr.com; Charles.Reed@waterboards.ca.gov
Subject: Samoa SWDS
Date: Wed, 28 Sep 2016 21:32:54 +0000

Hi Charles,

First off the figure you requested had gotten mixed up with something else and had not been brought in yet. Staff will be bring it in to the copiers tomorrow. You can expect to be contacted by Digital Prints and Imaging of Santa Rosa for payment of your copy.

As for the status of Freshwater Tissue's portion of the Samoa SWDS facility. The property must be treated as if waste exists on this property. Operations were permitted on the entire facility and at the time of the closure of the other 4 waste management units they did not investigate the status of your property. The consultant did conclude that any older units would be considered closed, and since we do not see exposed waste in that area, we support that conclusion. I have not seen any specific records on operations or closure of units in this area (and you have done your own file review), but that is not uncommon for sites of this age.

Going forward. Any proposed land use other than the current non-irrigated open space would need to go through this office for approval prior to the new use. We would be most interested in assuring that activities would not disturb the cover, change the drainage in a way that would add water to the site, or add irrigation. Any damage repair to a capped area of waste would need to meet the specifications listed in the WDRs or be an approved engineered alternative.

You could also go forward with an investigation to prove that there is not any waste on your property. Any work plan would need to be approved by this office prior to implementation. If a properly licensed professional concluded that waste does not currently exist on this property and we concur with this conclusion, we can then remove your property from the facility.

If you have any questions feel free to contact me.

Gina