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3 April 2008

Ms. Janice Goebel  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., Suite A  
Santa Rosa, California 95403

Mr. Ross Walker, City Manager  
City of Willits  
111 East Commercial Street  
Willits, California 95490

**SUBJECT: Review of Interim Remedial Action Workplan, Former Remco Hydraulics Facility, Prepared by Geomatrix, Inc for the Willits Environmental Remediation Trust, Dated 28 November 2008, City of Willits, Mendocino County, California (EKI A00014.00)**

Dear Ms. Goebel and Mr. Walker:

The City of Willits Department of Public Works is the Lead Public Agency ("LPA"), identified in the Amended Consent Decree responsible for reviewing and commenting on all aspects of the Work required to be performed by the Willits Trust to conduct an environmental investigation and remediation of the Remco Site. On behalf of the City of Willits ("City") and the LPA, Erler Kalinowski Inc. ("EKI") initially reviewed the Interim Remedial Action Work Plan for In-Situ Treatment of VOCs in Shallow Groundwater ("IRA Work Plan") at the former Remco Hydraulics Facility, and the immediate area presently owned by the Willits Trust ("Trust-owned Property"). The results of EKI's initial review of the IRA Work Plan were provided to the City by letter dated January 8, 2008 which was subsequently forwarded to the Willits Trust.

Based on its preliminary review of the IRA Work Plan, and as set forth in its January 8, 2008 letter, EKI offered the following comments and conclusions:

1. "vinyl chloride generation during in-situ enhanced bioremediation is a concern . . . and . . . groundwater extraction and treatment may be a more human health protective method of remediation;"



2. “the costs analyses presented in the IRA Work Plan likely overstate costs for groundwater extraction and ex-situ treatment and understate costs for in-situ enhanced bioremediation;” and

3. “with appropriate controls and land use restrictions, most of the Remco Site is currently remediated to the extent necessary for commercial/industrial land use.”

EKI’s initial review of the IRA Work Plan relied on the report entitled “Report of Additional Data Collection and Final Data Summary - VOC Area #2 Pilot Study Area” (Geomatrix, March 2007). Based upon the October 2006 sampling results set forth this March 2007 Geomatrix report, EKI concluded in its January 8, 2008 initial review that “While vinyl chloride concentrations in select individual wells appear to have decreased, overall, concentrations in the pilot study area appear to be increasing. . . . In some cases, the in-situ bioremediation creates conditions where the degradation processes stall at vinyl chloride . . .” (p.3, ¶ 3).

On January 16, 2008, the Willits Trust responded to EKI’s letter dated January 8, 2008. In the Willits Trust’s response, it was pointed out that the data that EKI relied on to evaluate the IRA Work Plan (data in the March 2007 report), were collected only through October 2006. EKI has now reviewed the Willits Trust’s January 16, 2008 response, including all the data collected in relation to in-situ VOC degradation studies conducted at the Site, and spoken further with Trust representatives regarding the Trust’s assumptions and conclusions in support of the proposed IRA. Based on this additional information, EKI, on behalf of the City, agrees that:

1. The additional in-situ bioremediation proposed in the IRA Work Plan may be an effective method to eliminate remaining VOCs in shallow groundwater within Trust-owned Property boundaries;

2. Data provided by the Trust through June 2007 (including figures attached to the Willits Trust’s response dated January 16, 2008) indicate that average vinyl chloride concentrations continue to decrease significantly within Trust-owned Property boundaries, presumably as a result of enhanced bioremediation (e.g. prior molasses injections in these areas);

3. The information provided by the Trust supports the conclusion that implementation of the proposed IRA will not create unacceptable or significant risk to human health or the environment during implementation of the IRA assuming that appropriate engineering controls and/or land use restrictions are put in place as part of any reuse or redevelopment;

4. The proposed in-situ treatment appears to be a potentially effective alternative to groundwater extraction and treatment remediation at Trust-owned Property; and

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5. The Trust has reasonably responded to EKI's questions regarding costs associated with implementation of the alternative remedial alternatives in the IRA Work Plan.

Ultimately, the Trust will remain responsible for remediating VOCs in groundwater. If the IRA proves ineffective at meeting goals, then alternative methods must be implemented. Accordingly, EKI, on behalf of the City, supports RWQCB approval of the IRA Work Plan, including issuance of all permits necessary for its operation.

Please call if you have questions or concerns.

Very truly yours,

ERLER & KALINOWSKI, INC.

A handwritten signature in black ink, appearing to read 'Earl D. James'.

Earl D. James, P.G.  
Project Manager

Cc: Stuart Block, Esq. – Cox, Castle & Nicholson  
H. James Lance, Esq. – City of Willits