



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
700 Heinz Avenue
Berkeley, California 94710-2721



Gavin Newsom
Governor

June 27, 2019

Michael Brosgart
1815 Seventh Street
Berkeley, California 94705

Dear Mr. Brosgart:

The Department of Toxic Substances Control (DTSC) met with you on June 13, 2019 to discuss the property located at 1691 Glendale Drive in McKinleyville, California where a cannabis facility is planned. This property, also identified by assessor parcel number (APN) 516-111-064 and hereafter referred to as "the Property", is a former portion of the McNamara and Peepe Lumber Mill site ("Site"), which is listed on DTSC's Envirostor database. You have been working with the Humboldt County Planning and Building Department (County) for the necessary permits to establish a cannabis facility. In our June 13, 2019 meeting, we discussed a letter the County received from the Thomas Law Group on behalf of the Humboldt Bay Municipal Water District (District) expressing concern about approving the Property for development. The District is concerned that construction and operation associated with the cannabis facility will result in pentachlorophenol-contaminated soil and groundwater flowing into Hall Creek to the Mad River and ultimately into the District's downstream water intake wells.

At your request, DTSC reviewed the environmental assessment report you provided and our historical files. DTSC has reviewed the environmental assessment report you provided and historical reports from the Site. DTSC focused its review on the following:

- Interim Remedial Investigation Report, American Environmental Management Corporation, August 1987
- Final Remedial Investigation Report, American Environmental Management Corporation, June 1989
- Report of Findings for Phase II Investigation, Blue Lake Forest Products/Aalfs Property, Winzler & Kelly, October 2003

The McNamara and Peepe Lumber Mill (Mill) processed and treated lumber from the 1940s to May 1984, when it filed for bankruptcy. From April 1967 to May 1984, processed lumber was treated with chemical fungicides to prevent wood staining in dip

tanks at the green chain building or by direct spraying at the planer chain building. The chemical fungicides contained pentachlorophenol (PCP) and 2,3,5,6-tetrachlorophenol (TCP). In 1981, a PCP spill occurred at the green chain building. Following this spill, the dip tank operation and the planer spray operation were discontinued by December 1981. A new dip tank was installed in August 1981 in an existing building south of Glendale Drive. In 1986, Blue Lake Forest Products resumed operations at the Mill. Blue Lake Forest Products did not use PCP- or TCP-containing solutions in its operations.

Remedial investigation activities at the Site took place between June 1987 and May 1989. Soil and surface water samples were collected from four suspected areas of contamination on the Site: the landfill area, the dip tank building, the planer chain building, and the green chain building. No suspected areas of contamination were identified on the Property during the remedial investigation. Sampling showed that the PCP and TCP contamination were confined to the soil near the green chain building. The Final Remedial Action Plan that DTSC approved for the Site focused the remedial action efforts on the areas at and near the green chain building and the dip tank building.

A Phase II environmental investigation was conducted at the former Mill and surrounding areas, by Winzler & Kelly in 2003. APNs 516-101-002, -059, -063; 516-101-006, -017, -040, -041, -060, -064, -068; 516-111-004, -005, -006, -015, -033; and 516-151-019 were sampled. The Property was included in this investigation. Twenty soil borings were drilled on these parcels and sampled. Soil samples were analyzed for PCP and TCP. Grab groundwater samples were collected from 11 borings and analyzed for PCP and TCP as well. Borings B-10 and B-11 were drilled on the Property. Two soil samples were collected at a depth of 6 inches and one soil sample was collected a depth of 5 feet. All three soil samples did not contain detectable concentrations of PCP or TCP. A grab groundwater sample was collected from B-11 and did not contain detectable concentrations of PCP or TCP.

PCP and TCP were not detected in samples collected from the Property during the 2003 sampling event. DTSC did not find any documentation of the use of PCP and TCP at the Property during our review of historical documents. Based on our review of the submitted documents, DTSC concludes the Property is not impacted by PCP-contaminated soil or groundwater.

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If you have any questions, please contact Nicole Yuen by phone at (510) 540-3881 or email at Nicole.Yuen@dtsc.ca.gov.

Sincerely,



Mark E. Piros, P.E.
Unit Chief
Site Mitigation and Restoration Program – Berkeley Office

cc:

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