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## Central Valley Regional Water Quality Control Board

31 August 2022

***Via e-mail only***

Mr. Mark Nelson  
2101-2603 Wilbur, LLC  
c/o EnviroAnalytics Group, LLC  
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**NOTICE OF TERMINATION FOR COVERAGE UNDER GENERAL WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2008-0149-009, GAYLORD CONTAINER CORPORATION FACILITY, EAST MILL, 2603 WILBUR AVENUE, ANTIOCH, CONTRA COSTA COUNTY**

Gaylord Container Corporation facility operated as a virgin paper and pulp facility utilizing the Kraft process to manufacture finished paper products between 1947 and 1991. The former facility is located at 2603 Wilbur Avenue in Antioch, Contra Costa County (Site). Most of the aboveground structures associated with the pulp facility were demolished in 2004 and 2005 under Department of Toxic Substances (DTSC) oversight. DTSC is also the lead agency overseeing the environmental cleanup activities at the Site. Groundwater beneath the Site's Non-Processing Area is impacted with the constituent of concern tetrachloroethene (PCE).

On 28 January 2010, the previous property owner, Forestar Real Estate Group (Forestar), submitted a *Notice of Intent* (NOI) requesting coverage of the Site for an In-Situ Chemical Oxidation (ISCO) pilot test using potassium permanganate under General Order No. R5-2008-0149, *General Waste Discharge Requirements for In-situ Groundwater Remediation at Sites with Volatile Organic Compounds, Nitrogen Compounds, Perchlorate, Pesticides, Semi-Volatile Compounds and/or Petroleum Compounds* (General Order). On 26 August 2010, Central Valley Water Board staff issued a Notice of Applicability (NOA) and the Monitoring and Reporting Program No. R5-2008-0149-009 (MRP).

Subsequently, Forestar submitted an additional NOI dated 6 May 2011, requesting coverage of the Site for full-scale ISCO remediation. On 7 November 2011, Central Valley Water Board staff issued an NOA for the Site for the full-scale ISCO remediation and assigned Revised MRP Order No. R5-2008-0149-009 for the full-scale ISCO monitoring. Central Valley Water Board made subsequent revisions to the MRP on 29 May 2012, 7 May 2013, and 24 July 2015.

ISCO injections occurred during several injection events between 2011 and 2012, with the final injection event occurring in June 2012. Groundwater at the Site has been monitored on a semi-annual basis since the issuance of the original NOA in 2010.

On 31 March 2022, Professional Environmental Consultants, LLC (PEC), on behalf of EnviroAnalytics Group, LLC (EAG), submitted the *Request to Rescind NOA R5-2008-0149-009 and Associated MRP* (Request), requesting Central Valley Water Board to rescind the coverage under the General Order since no more injections are planned at the Site. The Request also states that based on the Site conditions, it is unlikely that additional potassium permanganate injections would substantially decrease PCE concentrations at the Site.

Based on the evaluation of the water quality data in the injection and treatment zones, Central Valley Water Board staff concur with the Request to terminate the Site's coverage under the General Order. Therefore, as of the date of this letter, WDR R5-2008-0149-009 is terminated. Invoicing for the WDR will be modified accordingly. Please continue periodic groundwater monitoring and sampling according to the MRP until DTSC or Central Valley Water Board issues a new site-wide monitoring plan.

If you have questions or comments, please contact Sid Sewalia at (916) 464-4658 or by e-mail at [siddharth.sewalia@waterboards.ca.gov](mailto:siddharth.sewalia@waterboards.ca.gov).

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on Date: 2022.08.31 09:23:02-07'00'

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for Patrick Pulupa  
Executive officer

Cc (via e-mail): Mr. Philip Gilchrist, Professional Environmental Consultants, LLC  
Ms. Janelle Brown, Central Valley Water Board, Sacramento