



California Regional Water Quality Control Board Central Valley Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

12 October 2006

CERTIFIED MAIL
7004 0750 0001 7892 9892

Mr. Mike Sommers
Winemucca Trading Company Limited, Inc.
P. O. Box 4261
Incline Village, NV 89450

ORDER TO SUBMIT INFORMATION PURSUANT TO CALIFORNIA WATER CODE SECTION 13267, WINEMUCCA TRADING COMPANY LIMITED, INC., FORMER SHASTA PAPER COMPANY FACILITIES AND PROPERTIES INCLUDING THE SHASTA PULP AND PAPER MILL WASTEWATER TREATMENT LAGOONS, SHASTA COUNTY

On 29 October 2004, the California Regional Water Quality Control Board, Central Valley Region (hereafter Regional Water Board) Executive Officer issued Cleanup and Abatement Order (CAO) No. R5-2004-0717 to Winemucca Trading Company Limited, Inc. (Winemucca) requiring cleanup of wastes at the former Shasta Paper Company facilities and properties including the Shasta Pulp and Paper Mill, Shasta County. This CAO ordered Winemucca to sample and characterize paper pulp sludge by 1 April 2005; submit a plan to properly dispose of the sludge by 1 April 2005; submit a plan to clean-close the holding basins, clarifiers and wastewater treatment lagoons by 1 April 2005; and to complete closure activities associated with wastewater treatment lagoons, holding basins, and clarifiers at the Shasta Pulp and Paper Mill by 1 October 2006. **These items listed above were not completed as required by the CAO.**

On 5 October 2006, the Regional Water Board Assistant Executive Officer ordered Winemucca to provide by 10 October 2006:

- 1) Results of the sludge characterization performed at the wastewater treatment lagoons, holding basins, and clarifiers at the former Shasta Pulp and Paper Mill;
- 2) A Feasibility Study to address disposal of residual sludge in the wastewater treatment lagoons, holding basins and clarifiers and final closure of those containment structures in accordance with Title 27 – California Code of Regulations, Section 21400;
- 3) Parcel owner name and contact information, recorded grant deeds, current parcel maps, and any other information regarding parcel boundary adjustments since September 2004 for the parcels included in the CAO; and
- 4) A cost estimate for completing closure and post-closure maintenance activities associated with capping and closing the paper pulp sludge wastes in place at the wastewater treatment lagoons.

Winemucca submitted the 10 October 2006 *Feasibility Study Wastewater Treatment Facility, Winemucca Trading Company, Former Shasta Paper Mill, Anderson, California* to the Redding office of the Regional Water Board on 11 October 2006. Sludge characterization results and ownership information for the parcels included in CAO No. R5-2004-0717 were also submitted at that time. **These submittals are incomplete.**

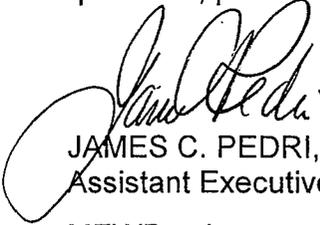


Winemucca is therefore required, pursuant to California Water Code (CWC) Section 13267, to provide the following by **18 October 2006**:

- A summary of work done to date by Winemucca or affiliated companies to develop sludge and pond reuse options (under Alternative 5). Specifically, provide information regarding the growth of catfish in the sludge lagoons and the biodiesel study being performed by the University of California (both discussed in our 4 October 2006 meeting with you). Include any related sampling results and discussions regarding on-going, planned, or completed treatability studies.
- Basis and assumptions for the cost estimates provided in the Feasibility Study.
- Information regarding any parcel boundary adjustments since September 2004 for each of the parcels included in CAO No. R5-2004-0717. This information is not provided in Appendix C, Parcel Deed Information, nor on Parcel Map A in this same appendix; its omission does not demonstrate reasonable care.
- A statement signed by an authorized representative of Winemucca certifying under penalty of law that the representative has examined and is familiar with the 11 October 2006 submittals, and that to his knowledge these submittals are true, complete, and accurate. The statement must also indicate that Winemucca endorses the information and conclusions provided in each submittal. Include this statement in all subsequent submittals, including those required in this letter.

This Order to submit technical reports or information is made pursuant to CWC Section 13267. CWC Section 13267(b) authorizes the Regional Water Board to require any person who has discharged waste to submit technical reports as may be required to investigate discharges of waste. The above requested report is necessary to determine the extent of pollution and to develop corrective actions protective of public health, the environment, and water quality. The persons named in this letter own the site on which waste has been discharged, and/or caused or permitted the discharges of waste at the site, and are therefore responsible for cleaning it up. Failure to comply with this Order or other Regional Water Board Orders may result in enforcement actions, including penalties. Failure or refusal to furnish the technical report or information required by CWC Section 13267(b) may result in administrative civil liability not to exceed one thousand dollars (\$1,000) per day for each day it is late pursuant to CWC Section 13268 or additional enforcement pursuant to CWC Section 13308, or both.

Feasibility study review comments will be transmitted under separate cover. If you have any questions, please contact Mey Bunte of my staff at (530) 224-4788 or the letterhead address.



JAMES C. PEDRI, P.E.
Assistant Executive Officer

MEWB: mb

cc: Clint Snyder, VESTRA Resources, Redding
Jim Smith, Shasta County Environmental Health Division, Redding
Russ Mull, Shasta County Planning Division, Redding
Jack Reese, Reese Smalley Wiseman & Schweitzer, Redding

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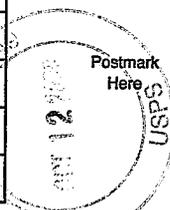
California Environmental Protection Agency



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PS Form 3800, June 2002 See Reverse for Instructions											