

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 90-147

SITE CLEANUP REQUIREMENTS FOR:

NAPA PIPE CORPORATION
NAPA, NAPA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region hereinafter called the Board, finds that:

1. Napa Pipe Corporation, a wholly-owned subsidiary of Oregon Steel Mills, Inc. (hereinafter called the discharger) owns and operates a 152 acre site at 1025 Kaiser Road. The site is bounded by the Napa River to the west and south, open land to the east and by business complexes to the north.
2. The site occupies a flat, marshy area near sea-level, on the east bank of the Napa River, at the end of the Napa Valley. Much of the facility is build on fill. The northern one-third of the site rests directly upon stream channel and alluvial fan deposits consisting of interbedded gravel, sand, silt, and clay deposits. The southern two-thirds of the site are underlain by fill above peat, clay, silt, fine-grained sand, and clayey gravel flood plain deposits of the Napa River and the mud flats of San Pablo Bay. Mud flat and fine grained-flood plain deposits interfinger beneath the site.
3. The discharger operates a steel pipe manufacturing facility which discharges wastewater from the pipe mill, the pipe internal coating operations and a portion of the surface storm water discharges into mechanical oil/water separator, which in turn discharges into the Napa Sanitation District's publicly owned treatment works. Storm drains from the facility discharge into the Napa River and its tributaries. The discharger operates several dry docks, which may have discharges to the Napa River.
4. Soil and ground water contamination has been identified at the site. Concentrations of barium and zinc in soils of the site exceeded hazardous levels as defined by Title 22 CCR. Concentrations of lead, barium, and chromium in ground water exceeded maximum contaminant level (MCL) concentrations as defined for drinking water standards in Title 22 CCR. Vinyl chloride was measured in ground water in excess of MCL and 1,1 Dichloroethane was detected in concentrations in excess of the proposed MCL. Concentrations of total petroleum hydrocarbons (TPH) was detected as great as 27,000 mg/kg in

soil and in excess of 71 mg/l in ground water. Trichloroethane was detected in groundwater in excess of the California MCL.

5. The discharger has proposed bioremediation of soil contaminated with organic compounds and/or stabilization of the soil contaminated with metals. In addition the discharger has proposed trenching, collection and discharge of the contaminated groundwater to the discharger's wastewater pretreatment system. Currently at the site, the discharger is attempting to bioremediate and/or stabilize soil contaminated with hydrocarbons and metals excavated during the closure of a surface impoundment.
6. The Board revised the Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) on December 17, 1986 and amended it on August 19, 1987, and on July 18, 1989. This Order implements water quality objectives contained in that Basin Plan.
7. Ground water is utilized for drinking water purposes in the area; there are two existing industrial process and service supply water wells on the site.
8. The potential beneficial uses of the ground water in the area are:
 - a. Municipal Supply;
 - b. Industrial Process and Service Supply; and,
 - c. Agricultural Supply.
9. The existing and potential beneficial uses of the Napa River are:
 - a. Municipal and Domestic Supply;
 - b. Agricultural Supply;
 - c. Navigation;
 - d. Water Contact Recreation;
 - e. Non-Contact Recreation;
 - f. Warm Fresh Water Habitat;
 - g. Cold Fresh Water Habitat;
 - h. Wildlife Habitat;
 - i. Preservation of Rare and Endangered Species;
 - j. Fish Migration; and,
 - k. Fish Spawning.
10. The discharger has caused or permitted, and threatens to cause or permit, waste to be discharged or deposited where it is or threatens to be discharged to waters of the State and creates or threatens to create a condition of pollution or nuisance. Final control and/or containment and remediation measures need to

be implemented to alleviate the threat to the environment posed by the plume of pollutants.

11. The discharger is liable for all reasonable costs incurred by the State Water Resources Control Board and this Board in the activities related to cleanup, abatement, or remedial action at the site undertaken pursuant to this Order.
12. This action is an order to enforce the laws and regulations administered by the Regional Board. This action is categorically exempt from the provisions of the CEQA pursuant to Section 15321 of the Resources Agency Guidelines.
13. The Board has issued Waste Discharge Requirement Order No. 89-070 to the discharger on May 17, 1989. The WDR related to the closure of a pretreatment impoundment, conducting a Site Investigation, developing a Corrective Action Plan and establishing a Self-Monitoring Program. This Site Cleanup Requirements are based on information developed from the discharger's Site Investigation and proposed Corrective Action Plan.
14. The Board has notified the discharger and interested agencies and persons of its intent under California Water Code Section 13304 to prescribe Site Cleanup Requirements for the discharge and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.
15. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, pursuant to Sections 13304 and 13267 of the California Water Code, that the discharger shall cleanup and abate the effects described in the above findings as follows:

A. Prohibitions

1. The discharge of wastes or hazardous materials in a manner which will degrade water quality or adversely affect the beneficial uses of the water of the State of California is prohibited.
2. The treatment or storage of waste shall not degrade the quality of any usable ground water.
3. The discharge of wastewater into surface waters is prohibited unless the discharge is into an approved publicly owned treatment works.

4. Further significant migration of pollutants through subsurface transport to waters of the State of California is prohibited.
5. Activities, associated with the subsurface investigation and site cleanup, that cause significant adverse migration of pollutants are prohibited.

B. Specifications

1. The storage, handling, treatment or disposal of soil or ground water containing pollutants shall not create a nuisance as defined in Section 13050(m) of the California Water Code.
2. The discharger shall conduct monitoring activities as needed to define the current local hydrogeologic conditions, and the lateral and vertical extent of ground water pollution. Should monitoring results show evidence of plume migration, additional plume characterization of pollutant extent may be required.

C. Provisions

1. The discharger shall, in a timely manner, submit work descriptions and draft technical reports to Board staff for all technical reports required in these Provisions. The discharger may be assessed monetary penalties for late or incomplete technical reports required by these Provisions.
2. The discharger shall comply with the Prohibitions and Specifications above, in accordance with the following time schedule and tasks:
 - (1). Submit a series of interim technical reports and a final technical report, acceptable to the Executive Officer. The interim reports shall include actions taken and proposed to control and/or contain, treat and/or dispose of all polluted ground water. The final technical report shall certify full hydraulic containment. Full hydraulic containment shall be as described in the Corrective Action Plan and as approved by the Executive Officer.
Interim Reports Due: May 1, 1991; December 1, 1991; and May 1, 1992.
Final Report Due: No later than December 1, 1992.
 - (2). Submit a series of interim technical reports and a final technical report, acceptable to the Executive Officer. The interim reports shall include actions taken and proposed that address the horizontal and vertical extent of soil contamination as identified in the Site Investigation Report and Corrective Action Plan. The

effectiveness of the bioremediation and/or stabilization method will be included as well as a schedule for treatment and/or disposal of all contaminated soil. The final technical report shall certify treatment and proper disposal of the contaminated soil and the schedule for treatment and/or disposal of all remaining contaminated soil.

Interim Reports Due: May 1, 1991; December 1, 1991; and, May 1, 1992.

Final Report Due: No later than December 1, 1992.

3. The discharger shall reimburse the State Water Resources Control Board and this Board for all reasonable costs incurred by the State Water Resources Control Board and this Board in the activities related to cleanup, abatement, or remedial action at the site undertaken pursuant to this Order.
4. The discharger shall maintain a copy of this order at the site so as to be available at all times to site operating personnel.
5. Technical reports, submitted by the discharger, in compliance with the Prohibitions, Specifications, and Provisions of this Order shall be submitted to the Board on the schedule specified herein. These reports shall consist of a letter report that includes the following:
 - (1) A summary of work completed since submittal of the previous report and work projected to be completed by the time of the next report;
 - (2) Identification of any obstacles which may threaten compliance with the schedule of this Order and what actions are being taken to overcome these obstacles;
 - (3) In the event of non-compliance with any Prohibition, Specification or Provision of this Order, written notification which clarifies the reasons for non-compliance and which proposes specific measures and a schedule to achieve compliance. This written notification shall identify work not completed that was projected for completion, and shall identify the impact of non-compliance on achieving compliance with the remaining requirements of this Order; and,
 - (4) In the first self-monitoring report, an evaluation of the current ground water monitoring system and a proposal for modifications as appropriate.

6. All submittals of hydrogeological plans, specifications, reports, and documents (except quarterly progress and self-monitoring reports), shall be signed by and stamped with the seal of a registered geologist, registered engineering geologist, or registered professional engineer.
7. All samples shall be analyzed by State certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control records for Board review.
8. The discharger shall maintain in good working order, and operate as efficiently as possible, any facility or control system installed to achieve compliance with the requirements of this Order.
9. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order, submitted by the discharger, shall also be provided to the following agencies:
 - (1) Napa County Department of Environmental Health; and,
 - (2) State Department of Health Services.
10. The discharger shall permit the Board or its authorized representative, in accordance with Section 13267 (c) of the California Water Code, the following:
 - (1) Entry upon premises in which any pollution sources exist, or may potentially exist, or in which any required records are kept, which are relevant to this Order;
 - (2) Access to copy and records required to be kept under the terms and conditions of this Order;
 - (3) Inspection of any monitoring equipment or methodology implemented in response to this Order; and
 - (4) Sampling of any ground water or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the discharger.
11. The discharger shall remove and relocate any wastes which are discharged at this site in violation of these requirements.

12. The discharger shall file with this Board a report of any material change or proposed change in the character, location, or quantity of this waste discharge. For the purpose of these requirements, this includes any proposed change in the boundaries, contours, or ownership of the disposal areas.
13. The Board considers the property owner and site operator to have a continuing responsibility for correcting any problems within their reasonable control which arise in the future as a result of this waste discharge or water applied to this property during subsequent use of the land for other purposes.
14. These requirements do not authorize the commission of any act causing injury to the property of another or of the public, do not convey any property rights, do not remove liability under federal, state or local laws, and do not authorize the discharge of waste without the appropriate federal, state or local permits, authorizations, or determinations.
15. If any hazardous substance is discharged in or on any waters of the state, or discharged and deposited, or probably will be discharged in or on any waters of the state, the discharger shall report such discharge to the following:
 - (1) This Regional Board at (415) 464-1255 on weekdays during office hours from 8 a.m. to 5 p.m.; and,
 - (2) The Office of Emergency Services at (800) 852- 7550.

A written report shall be filed with the Regional Board within five working days and shall contain information relative to the following:

- (a) The nature of waste or pollutant;
- (b) The quantity involved and the duration of incident;
- (c) The cause of spill;
- (d) The estimated size of affected area;
- (e) The corrective measures that have been taken or planned, and a schedule of these measures; and,
- (f) The persons/agencies notified.

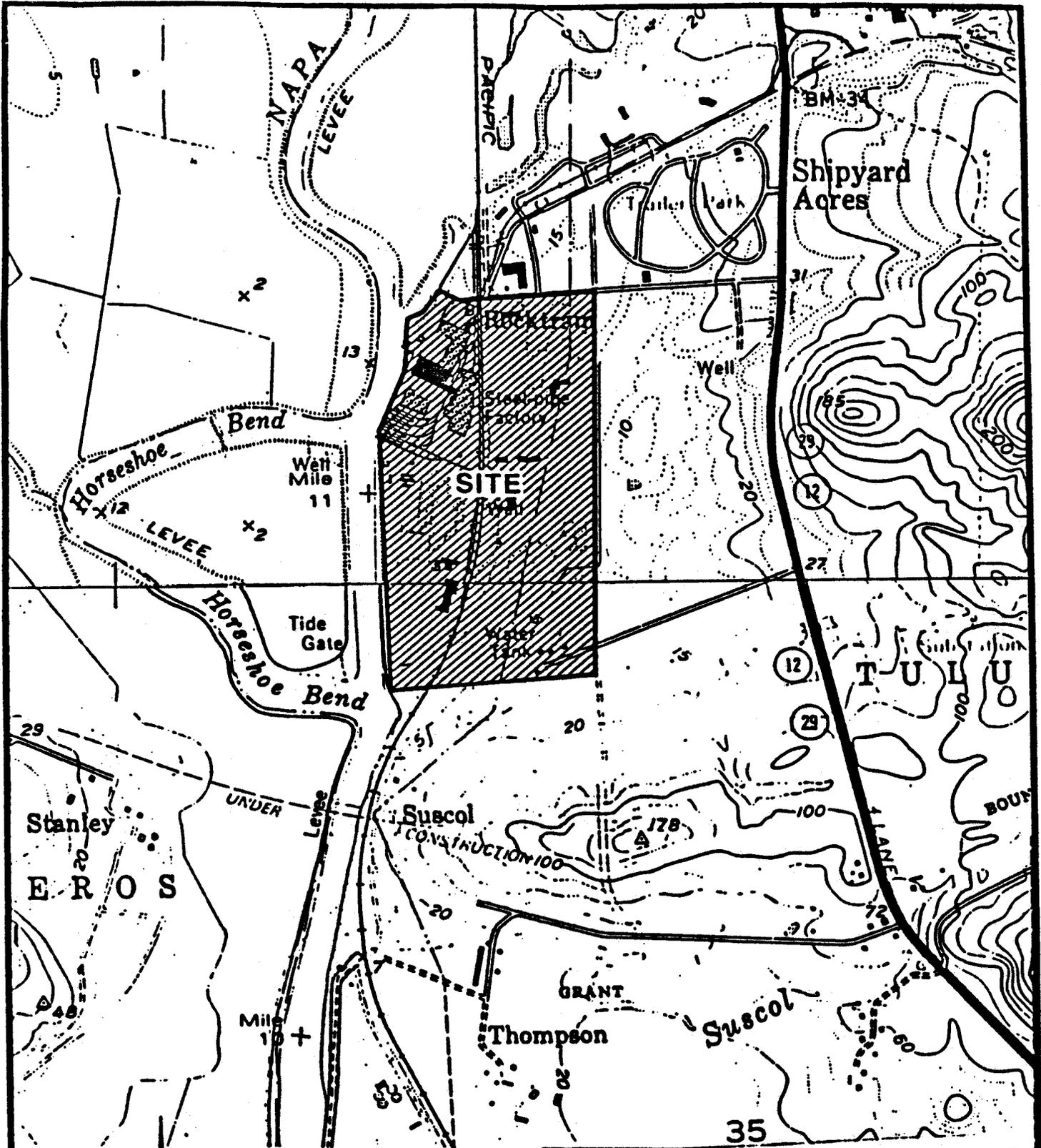
16. The Board will review this Order periodically and may revise the requirements when necessary.
17. If the discharger is delayed, interrupted or prevented from meeting one or more of the completion dates specified in this Order, the discharger shall promptly notify the Executive Officer and the Board shall consider revision to this Order.

I, Steven R. Ritchie, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region on November 14, 1990.



Steven R. Ritchie
Executive Officer

Attachments:
Figure 1: Location Map



Napa and
Cuttings Wharf
U.S.G.S.
7 1/2' Quadrangle
Base Map

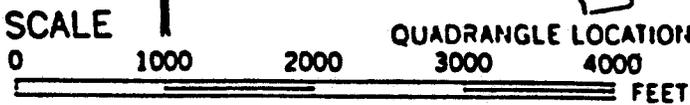


FIGURE 1

SITE LOCATION MAP

NAPA PIPE CORPORATION - Napa, California

DRAWN BY: JAV	DATE: 07/17/90	PROJECT NO. 82420
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