

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER No. 00-018

RESCISSION OF SITE CLEANUP REQUIREMENTS (ORDER No. 96-083)

NORTH AMERICAN TRANSFORMER
MILPITAS FACILITY
MILPITAS, SANTA CLARA COUNTY

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

1. **Site Location and Description:** North American Transformer (NAT) has owned and operated the site at 1200 Piper Drive in Milpitas since its 1966 to 1967 development from agricultural use to a manufacturing facility for electrical transformers (see site location map Figure 1).
2. **Regional Board Orders:** North American Transformer (hereinafter referred to as a discharger) was named as a discharger because of its ownership and occupancy of the site during which time one or more chemical releases occurred. The Board has adopted the following orders for this site:

Site Cleanup Requirements (SCR) Order No. 90-073
Revised SCR Order No. 92-085 (rescinding Order No. 90-073)
Final SCR Order No. 96-083 (rescinding Order No. 92-085)

SCR Order No. 90-073 specified tasks to determine whether, or not, the site was a source of chemicals of concern to groundwater. The results of these investigations identified two areas of concern - Bay 1 and the transformer oil pipeline (TOP) area. Clayey soils containing elevated concentrations of VOCs were characterized and excavated from the Bay 1 area. In addition, NAT installed and operated a soil vapor extraction system at Bay 1. Releases from an underground pipeline were discovered in the transformer oil pipeline area (TOP area). Chemicals of concern in soils at the TOP area included polychlorinated biphenyls (PCBs), trichloroethane (TCA), and total petroleum hydrocarbons (TPH) as

transformer oil and petroleum naphtha. Free phase TPH was discovered on the groundwater table in the immediate vicinity of the TOP area.

In SCR Order No. 92-085 NAT was named as a discharger of TPH and TCA due to the release at the TOP area. Order 92-085 required NAT to prepare a Final Cleanup Objectives and Actions (FCOA) Report, evaluate and propose remedial solutions for Bay 1 and the TOP area, and to implement the identified remedies. NAT was in the early stages of free phase product remediation at the time the Board issued Order 92-085. Since then, the additional remedial and monitoring activities conducted at the site indicate that the Bay 1 soil vapor extraction (SVE) has accomplished its remedial objectives, that TCA in groundwater has declined to concentrations well below maximum contaminant levels (MCLs), and the free phase TPH in the TOP area has been removed.

Order 96-083 adopted the cleanup levels and actions proposed in the FCOA Report, affirmed closure of all areas of concern, specified that free phase product recovery in the TOP Area constitutes a final remedial action for TPH, and modified monitoring requirements. In addition, Order 96-083 set a final task for closure of remedial activities in the TOP area when it could be demonstrated that the goal of removal of free phase product had been achieved.

The discharger has demonstrated that this goal has been achieved and the free phase TPH removal system in the TOP area has been decommissioned and removed from the site. Some additional investigation and remediation as part of a business transaction have also taken place. This includes the removal of PCB affected soil under the building slab adjacent to the TOP area and additional PCB removal in the drainage ditch on the west end of the site. In both cases removals were conducted pursuant to the established cleanup standards of 25 mg/kg PCBs set forth in the FCOA report.

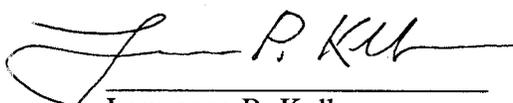
3. **Adjacent Facilities:** Four facilities are located adjacent to NAT: Jones Chemicals Inc. (Jones) operates a facility immediately adjacent upgradient to the east; Milpitas Business Park is located to the south; the Great Mall of the Bay Area (former Ford Motor Company Facility) is downgradient to the west; and a light industrial park to the north (see Figure 1). The RWQCB has issued Site Cleanup Requirements Orders to both Jones and Ford Motor Company. Remedial activities are being or have been conducted by those parties pursuant to the requirements of their respective Orders.
4. **Offsite Plumes:** A plume of chlorinated solvents originating from a 1982 spill on the Jones property has migrated across the NAT and onto the upgradient edge of the Great Mall of the Bay Area property. The Jones remediation system consists of two rows of extraction wells on the NAT property, upgradient of the TOP area and an additional row on the upgradient edge of the Great Mall property. These wells appear to be effective in hydraulically containing the plume as well as reducing the concentration of pollutants in groundwater. It is anticipated that the Jones extraction system will continue in operation

for several more years. Modification to the extraction system (i.e. relocation of extraction wells and piping) may be necessary should additional development occur on any of the affected properties. It is anticipated that the south yard area of the NAT property will be developed in the near future.

5. **CEQA:** This action rescinds an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.
6. **Notification:** The Board has notified the discharger and all interested agencies and persons of its intent under California Water Code Section 13304 to rescind site cleanup requirements for NAT, and has provided them with an opportunity to submit their written comments.
7. **Public Hearing:** The Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that Site Cleanup Requirements, Order No. 96-083 is rescinded.

I, Lawrence P. Kolb, Acting Executive Officer, do hereby certify that 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 March 15, 2000.



Lawrence P. Kolb
Acting Executive Officer

