

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 00-113

SITE CLEANUP REQUIREMENTS FOR:

TEXACO, INC.
CLYDE AND ANAVON ANDERSON

for the property located at

506 OIL COMPANY ROAD
NAPA, NAPA COUNTY, CALIFORNIA

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

1. **Site Location:** The former Texaco, Inc. Oil Terminal property (hereinafter referred to as the Site) is approximately 0.4 acres in area, and is located at 506 Oil Company Road in Napa County (see Figure 1). The Site is flat and is located on the eastern bank of the Napa River, approximately 0.5 miles from downtown Napa. Two buildings occupy the site, and a dock extends westward into the Napa River from the main building. Surrounding land use is mixed, commercial/industrial and residential.
2. **Site History:**
 - a. In January 1929, Texaco, Inc. acquired ownership of the property (Texaco, Inc. hereinafter is called the dischargers). The site was utilized as a bulk oil distribution center until about 1974. Three vertical tanks and a pump island were located on the property between 1940 and 1974.
 - b. In June 1980, Clyde and Anavon Anderson acquired the property and remain the current owners. The site is currently used for storage of miscellaneous equipment and material.
3. **Napa River Flood Control Project:** The Napa River Flood Management Plan, designed by the Community Coalition of Napa Flood Management, and sponsored by the Napa County Flood Control and Water Conservation District, is a creative and successful cooperation project to bring flood protection, watershed management, and environmental restoration to the entire Napa River Valley and economic revitalization to the City of Napa. The Napa County Flood Control and Water Conservation District is implementing a \$250 million plan which provides flood protection through reconnecting the Napa River to its historical floodplain and the restoration of over 650 acres of tidal wetlands of the San Francisco Bay Estuary while protecting 2700 homes, 350 businesses, and over 50 public properties from 100 year flood levels. The implementation of the project requires substantial soil excavation and channel widening along approximately seven

miles of the Napa River. Construction will occur in stages, first in the southern reaches, next in the vicinity of the City of Napa, and lastly in the northern reaches (contracts I through III).

The site is one of eight petroleum-impacted sites within the contract II.B area. The eight sites are located in areas between Eighth/River Streets and Oil Company Road (see Figure 2). The majority of these sites involved the storage, handling, and distribution of diesel, heating oil and gasoline. Beginning in the north and moving southward, they are as follows:

NR17- The Palzis Property; NR18-The Dillingham Construction North America, Inc.; NR19-The North Bay Oil Company; NR20-Fraser-Edward Paving Company (Formerly Mobil Bulk Plant 99-NB); NR33-Former Phillips Oil Terminal; NR35-Former Texaco, Inc. Oil Terminal; NR36 Former ARCO Oil Terminal, and NR37-the Former Exxon Oil Terminal.

The U.S. Army Corps of Engineers, which will fund and execute the construction of the flood control project, requires that polluted properties be acquired by the District and remediated before construction begins. Construction has already begun on the early contracts, and is scheduled to begin in the summer of 2002 for contract II.B. Significant delay in remediation of petroleum contamination at the eight sites is likely to delay the Corps' construction work and jeopardize federal funding for the flood control project. The District has proposed a consolidated remediation project for the eight sites, in order to hasten remediation and reduce remediation costs. The District has indicated its willingness to provide polluted-soil treatment and disposal capability as part of a consolidated remediation project.

4. **Reason for Re-evaluation of the Site:** On October 23, 1996, Board staff issued a No Further Action letter to the dischargers, and the case was deemed closed. The letter was based on information obtained from 3 borings on the facility. In one boring a ground water sample was taken, in the others the nature of the soil matrix was such that no groundwater was present to be sampled. The No Further Action Letter, however, contained language, which informed the dischargers that Board staff could re-open the case if new information was obtained which supporting such action.

Such information was obtained pursuant to a recent review of an April 2000 technical report prepared by Montgomery Watson, consultants for the Napa Flood Control District. A boring taken on the site showed substantial concentrations of diesel and gasoline in groundwater at levels of 19,000 ug/l and 14,000 ug/l, respectively. Petroleum hydrocarbons in vadose-zone soils were substantially less.

Characterization of this site has been based on very limited information. Additional work needs to be done on the site for the following reasons:

- 1) The property immediately adjacent to the new boring is the Wine Train Right-of-Way. The very high concentrations of petroleum hydrocarbons in the groundwater suggest that the pollution is due to a major release somewhere on the site. On the other hand, the modest pollution of the vadose zone in the vicinity of the boring suggests that the boring location is not the actual site of the pollution itself (e.g., offsite railroad spill or other type of railroad accident occurring in this vicinity).
 - 2) Other operations adjacent to the property do not appear likely sources of the high levels of petroleum pollution discovered in groundwater at the new boring, located approximately midway and in the easterly portion of the property.
 - 3) The property has a long history of being used for the storage of petroleum hydrocarbons.
 - 4) Migration of petroleum hydrocarbons along buried stream channels is a likely mechanism of pollutant transport. This phenomena has been illustrated at other sites to the south of this site. Releases occurring from the former aboveground tanks and/or their appurtenant piping network into the subsurface could be transported a substantial distance from their original point of release.
 - 5) The extent of soil and groundwater pollution at the site remains to be fully delineated. Given this new analytical information, the possibility exists that areas offsite, including the Napa River, are being affected.
5. **Named Dischargers:** Texaco, Inc. is a discharger, because it is the past owner and operator of the facility and is based upon past chemical usage and operations described in finding 2 above.

Clyde and Anavon Anderson are named as dischargers because they are the current property owners. Clyde and Anavon Anderson will be responsible for compliance only if the Board or Executive Officer finds that other named discharger (Texaco, Inc.) has failed to comply with the requirements of this order.

If additional information is submitted indicating that other parties caused or permitted any waste to be discharged on the Site where it entered or threatened to enter waters of the state, the Board will consider adding that party's name to this order.

6. **Regulatory Status:** This site is currently not subject to Board order. However, on July 31, 2000, the Board issued a Section 13267 letter to Equiva Services, LLC (subsidiary of Equilon), requesting submittal of a workplan for the delineation of the extent of petroleum hydrocarbon pollution in soil and groundwater. Equiva conducts environmental engineering services for any properties formerly owned by Texaco, Inc.
7. **Site Hydrogeology:** Shallow groundwater underlying the site occurs at an approximate depth of 10 feet below ground surface. Groundwater beneath the property is affected by the daily tidal fluctuations of the Napa River.
8. **Remedial Investigation:** Kleinfelder, Inc., consultants on behalf of the U.S. Army Corps of Engineers, prepared a Preliminary Site Assessment for the Site, dated August 20, 1993. The pollutants of concern identified at the site include benzene, toluene, ethyl-benzene, xylenes (BTEX), and total petroleum hydrocarbons as gasoline (TPH-g) and diesel (TPH-d). Investigations performed by them at the time, did not reveal any releases of petroleum hydrocarbons to soil or groundwater.

In December 1999, at the request of the Napa Flood Control and Water Conservation District, the District's consultant, Montgomery Watson, conducted a follow-up soil and groundwater investigation at the Site with one boring and submitted the results of its findings to the Board in a report dated April 2000. Groundwater beneath the Site has been impacted with elevated concentrations of total petroleum hydrocarbons in the diesel and gasoline ranges at up to 19,000 ug/l and 14,000 ug/l, respectively. Concentrations of total petroleum hydrocarbon in the gasoline range in vadose-zone soil was about 210 mg/kg.

Elevated concentrations of petroleum hydrocarbon are present in the subsurface and impacting quality of water in the Napa River environment; and despite the work performed, the extent of pollutants in soil and groundwater need to be fully delineated.

9. **Nearby Sites:** Adjacent sites include the Napa Valley Wine Train property, located north of the site, and the North Bay Oil Company, located to the south. The Napa Valley Wine Train (NR34) site is part of the larger Napa Valley Wine Train property located at 800 Eighth Street in Napa, Napa County. The property was inspected by a Kleinfelder on December 16, 1992. The purpose for the property inspection was to gather information regarding the land use, storage or handling of hazardous chemicals at the property. During the December 16, 1992 inspection, Kleinfelder observed the following items at the NR34 property:
 - Creosote on the railroad ties
 - Area of possible soil staining between the railroad tracks, near the loading platform.
 - Black soil staining between the railroad tracks.

- Small quantities of cleaners stored in a railroad car east of the site.

Regardless, none of these constituents were found on the site. Further, offsite sources in the south, notably at the former North Bay Oil property, appear too far south and downgradient to affect the property.

10. **Interim Remedial Measures:** No interim remedial measures have been implemented at the site.
11. **Basin Plan:** The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on June 21, 1995. This updated and consolidated plan represents the Board's master water quality control planning document. The revised Basin Plan was approved by the State Water Resources Control Board and the Office of Administrative Law on July 20, 1995, and November 13, 1995, respectively. A summary of regulatory provisions is contained in 23 CCR 3912. The Basin Plan defines beneficial uses and water quality objectives for waters of the State, including surface waters and groundwaters.

The potential beneficial uses of groundwater underlying and adjacent to the site include:

- a. Municipal and domestic water supply
- b. Freshwater replenishment to surface waters
- c. Industrial process water supply
- d. Agricultural water supply

The existing and potential beneficial uses of the Napa River, San Pablo Bay, and contiguous surface waters include:

- a. Water contact and non-water Contact recreation
- b. Fresh water replenishment
- c. Wildlife habitat
- d. Preservation of areas of special biological significance
- e. Fish migration and spawning
- f. Navigation
- g. Estuarine habitat
- h. Ocean commercial and sport fishing, Preservation of rare and endangered species

12. **Other Board Policies:** Board Resolution No. 88-160 allows discharges of extracted, treated groundwater from site cleanups to surface waters only if it has been demonstrated that neither reclamation nor discharge to the sanitary sewer is technically and economically feasible.

Board Resolution No. 89-39, "Sources of Drinking Water," defines potential sources of drinking water to include all groundwater in the region, with limited exceptions for areas of high TDS, low yield, or naturally-high contaminant levels.

13. **State Water Board Policies:** State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters In California," applies to this discharge and requires attainment of background levels of water quality, or the highest level of water quality which is reasonable if background levels of water quality cannot be restored. Cleanup levels other than background must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of such water, and not result in exceedance of applicable water quality objectives.

State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304, applies to this discharge. This order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

14. **Preliminary Cleanup Goals:** The dischargers will need to make assumptions about future cleanup standards for soil and groundwater, in order to determine the necessary extent of remediation investigation and the scope of the remedial action plan. Pending the establishment of cleanup standards, the following preliminary cleanup goals should be used for this purpose:

Media	TPHg	TPHd
b. Soils		
Category A (excavated)	n/a	n/a
Category B (marsh plain)	12 mg/kg	144 mg/kg
Category C (flood plain)	629 mg/kg	518 mg/kg
Category D (deeper soils)	n/a	n/a
b. Groundwater		
Category B (marsh plain)	n/a	n/a
Category C (flood plain)	3,700 ug/l	640 ug/l

Note: See attached Figure 3 for definitions of categories and a schematic of how they would be applied.

15. **Adverse Effects on Beneficial Uses of the Napa River:** Petroleum hydrocarbons are found at high concentrations in shallow groundwater at this site, including free product near the water table. These constituents are able to migrate readily in groundwater, particularly in the more transmissive sands and gravels found in the subsurface. These constituents are found in groundwater near the Napa River at levels substantially above applicable surface water objectives and discharge to the Napa River following dilution and attenuation. This discharge threatens beneficial uses of the Napa River.
16. **Basis for 13304 Order:** The dischargers have caused or permitted waste to be discharged or deposited where it is or threatens to be discharged into waters of the State and creates or threatens to create a condition of pollution or nuisance.
17. **Cost Recovery:** Pursuant to California Water Code Section 13304, the dischargers are hereby notified that the Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this order.
18. **CEQA:** This action is 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.
19. **Notification:** The Board has notified the dischargers and all 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 to submit their written comments.
20. **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 the dischargers (or their agents, successors, or assigns) shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous substances in a manner, which will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.
2. Further significant migration of wastes or hazardous substances through subsurface transport to waters of the State is prohibited.

3. Activities associated with the subsurface investigation and cleanup, which will cause significant adverse migration of wastes or hazardous substances, are prohibited

B. TASKS

1. **NOTICE OF INTENT FOR PARTICIPATION IN A CONSOLIDATED REMEDIATION APPROACH FOR THE NAPA FLOOD CONTROL PROJECT**

- a. **COMPLIANCE DATE: November 1, 2000**

Submit a Notice of Intent (NOI) indicating whether the dischargers are or are not participating in the consolidated remediation approach proposed by the District. This selection will determine the task 3 deadline and will allow the District to plan its consolidated project.

- b. **COMPLIANCE DATE: December 15, 2000**

If the dischargers elect to participate in the consolidated remediation approach in Task 1.a, then by this date they must submit a signed copy of their agreement with the District.

2. **COMPLETION OF SITE ASSESSMENT**

COMPLIANCE DATE: December 15, 2000

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the workplan previously approved by the Executive Officer. The technical report shall define the vertical and lateral extent of pollution down to concentrations at or below typical cleanup standards for soil and groundwater.

In the event that the discharger discovers that the pollution herein referred to is not the result of past operations at the site, and the Executive Officer concurs with the discharger's interpretation of the results of the site assessment investigation, then the dischargers will not be required to complete Task 3 of this order.

3. PROPOSED FINAL REMEDIAL ACTIONS AND CLEANUP STANDARDS

COMPLIANCE DATE: March 1, 2001*

This compliance date shall be January 1, 2001, if the discharger submits a copy of the signed agreement to participate in the consolidated remedial approach (pursuant to Task 1.b). The Executive Officer may approve a delay of up to 3 months in this deadline if compliance is delayed due to factors reasonably beyond the dischargers' control.

Submit a technical report acceptable to the Executive Officer containing:

- a. Results of the site assessment
- b. Feasibility study evaluating alternative final remedial actions, with one alternative should include cooperative cleanup with neighboring parties
- c. Risk assessment for current and post-cleanup exposures at the discharger's option
- d. Recommended final remedial actions and cleanup standards
- e. Implementation tasks and time schedule such that cleanup is achieved by June 30, 2002.

Item b should include projections of cost, effectiveness, benefits, and impact on public health, welfare, and the environment of each alternative action.

Items a through c should be consistent with the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), CERCLA guidance documents with respect to remedial investigations and feasibility studies, Health and Safety Code Section 25356.1 (c), and State Board Resolution No. 92-49 as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304").

- 4. Delayed Compliance:** If the dischargers are delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the dischargers shall promptly notify the Executive Officer and the Board may consider revision to this Order.

C. PROVISIONS

1. **No Nuisance:** The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in California Water Code Section 13050(m).
2. **Good O&M:** The dischargers 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.
3. **Cost Recovery:** The dischargers shall be liable, pursuant to California Water Code Section 13304, to the Board for all reasonable costs actually incurred by the Board to Investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the site addressed by this Order is enrolled in a State Water Resources Control Board managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised by the dischargers over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.
4. **Access to Site and Records:** In accordance with California Water Code Section 13267(c), the dischargers shall permit the Board or its authorized representative:
 - a. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
 - b. Access to copy any records required to be kept under the requirements of this Order.
 - c. Inspection of any monitoring or remediation facilities installed in response to this Order
 - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the dischargers.
5. **Contractor/Consultant Qualifications:** All technical documents (plans, specifications, and reports) shall be signed by and stamped with the seal of a California registered geologist, a California certified engineering geologist, or a California registered civil engineer.

6. **Lab Qualifications:** 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 (QA/QC) records for Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g. temperature).
7. **Technical Documents:** All technical reports submitted in compliance with this Order shall be satisfactory to the Executive Officer, and, if necessary, the Dischargers may be required to submit additional information.
8. **Document Distribution:** Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following agencies:
 - a. City of Napa Department of Public Works
 - b. Napa County Department of Environmental Management
 - c. Napa County Flood Control and Water Conservation District
9. **Reporting of Changed Owner or Operator:** The dischargers shall file a technical report on any changes in site occupancy or ownership associated with the property described in this Order.
10. **Reporting of Hazardous Substance Release:** If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is discharged or threatens to be discharged in or on any waters of the State, the dischargers shall report such discharge to the Regional Board by calling (510) 622-2300 during regular office hours (Monday through Friday, 8:00 to 5:00).

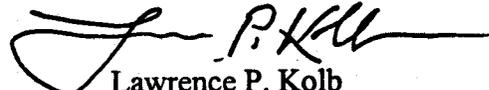
A written report shall be filed with the Board within five working days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/agencies notified.

This reporting is in addition to reporting to the Office of Emergency Services required pursuant to the Health and Safety Code.

11. **Secondarily Responsible Discharger:** Within 60 days of being notified by the Executive Officer that other named dischargers have failed to comply with this order, Clyde and Anavon Anderson as property owners shall then be responsible for complying with this order. Task deadlines will be automatically adjusted to add 60 days.

12. **Periodic SCR Review:** The Board will review this Order periodically and may revise it when necessary.

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 October 18, 2000.

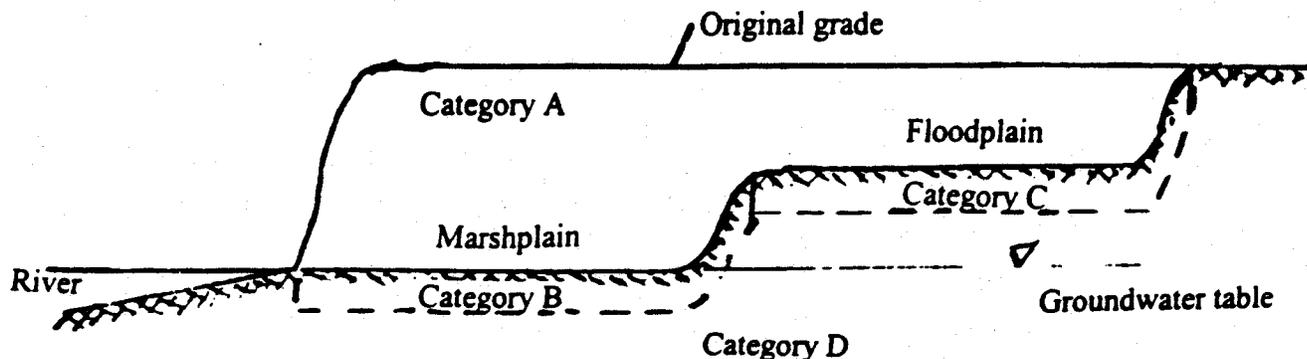

Lawrence P. Kolb
Acting Executive Officer

- Figures: (1) Site Location Map
(2) Contract II.B Sites Location Map
(3) Preliminary Cleanup Goals Schematic

**FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY
SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED
TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER
CODE SECTIONS 13267 OR 13350, OR REFERRAL TO THE ATTORNEY
GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY**

Figure 3

Risk-based TPH cleanup goals for sites affected by Napa River flood control project



	TPHg (1)	TPHd (1)	Units / Source
SOILS			
Category A – removed for project			see note (2)
Category B – marshplain	12	144	mg/kg SF Presidio
Category C – floodplain	629	518	mg/kg SF Airport
Category D – deeper soils			see note (3)
GROUNDWATER			
Category B – below marshplain	n a	n a	
Category C – below floodplain	3,700	640	ug/l SF Airport

Notes:

1. These cleanup goals may be adjusted for site-specific soil type, provided that elutriate toxicity test(s) acceptable to the Board are conducted to confirm the protectiveness of the adjusted goals. The TPHg marshplain value of 12 mg kg would need to be adjusted upward to ambient concentrations (about 93 mg kg).
2. Category A TPH goal depends on reuse/disposal of soil. For onsite reuse, refer to category B-D goals. For offsite reuse/disposal, see WDR for details.
3. Category D TPH goal is to removal free product or demonstrate to Board satisfaction that TPH will not migrate to areas B or C (shallow soils) under post-construction conditions, either with or without engineering controls.

Definitions:

- Category A – soils to be excavated to create marshplain and floodplain
- Category B – marshplain soils (0 to 5* feet below final grade)
- Category C – floodplain soils (0 to 5* feet below final grade)
- Category D – soils more than 5* feet below final grade

* option of a different value if justified to Board satisfaction based on engineering controls, contingency plan, or site-specific "fate and transport" analysis

108 Map 234.07801 FILE: h:\projects\map\mapfig1a.dgn DATE: 3/10/08 SCALE: 30.000000:1.000000



NR35-4	Depth (ft bgs)		
	4.25	7.5	10.0
TRPH	ND	ND	ND
TPH-GASOLINE	ND	ND	ND
TPH-DIESEL	ND	ND	ND
BTEX	ND	ND	ND
PCBs	ND	ND	ND

NR35-5	Depth (ft bgs)	
	9.0	10.5
TRPH	ND	ND
TPH-GASOLINE	ND	ND
TPH-DIESEL	ND	ND
BTEX	ND	ND
PCBs	ND	ND

S-M	Depth (ft bgs)	
	5.0	13
TPH-GASOLINE	(0.10)	210
TPH-DIESEL	30	15
TPH-MOTOR OIL	150	38
BTEX	(0.001)	2.68

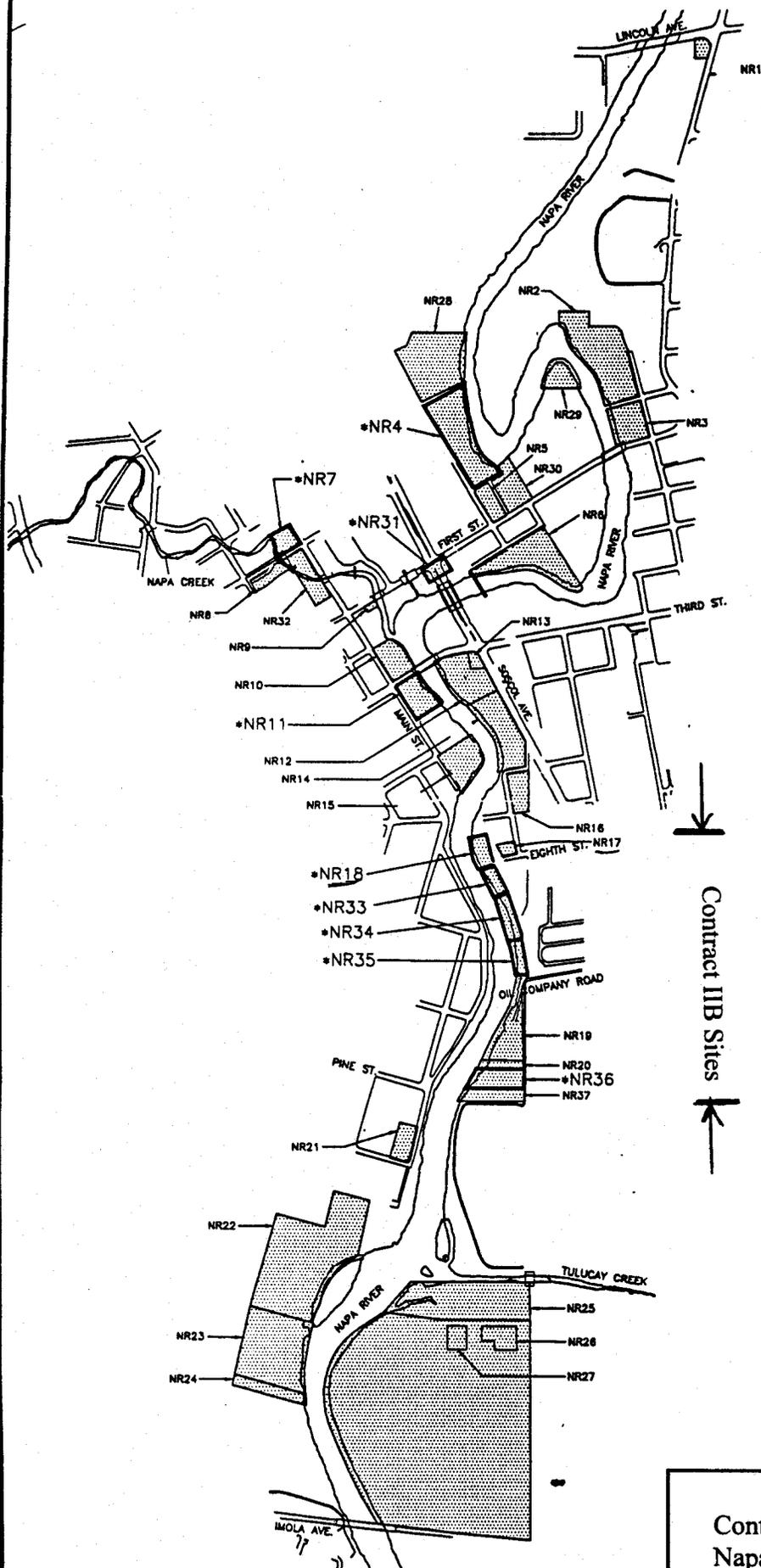
NR35-2	Depth (ft bgs)		
	6.5	12.0	12.5
TRPH	ND	ND	ND
TPH-GASOLINE	ND	ND	ND
TPH-DIESEL	ND	ND	ND
BTEX	ND	ND	ND
PCBs	ND	ND	ND
PESTICIDES	ND	ND	ND

- LEGEND:**
- - - - - PROPOSED MARSH EXCAVATION LINE
 - - - - - EXCAVATION LINE
 - - - - - PROPERTY BOUNDARY
 - ==== WHE TRAIN RAILWAY
 - GROUNDWATER MONITORING WELL
 - SOIL BORING
 - SURFACE ELEVATION CONTOUR
 - ND NOT DETECTED AT OR ABOVE METHOD DETECTION LIMITS
 - TPH TOTAL PETROLEUM HYDROCARBONS
 - BTEX BENZENE, TOLUENE, ETHYLBENZENE, AND XYLENES
 - TRPH TOTAL RECOVERABLE PETROLEUM HYDROCARBONS
 - PCBs POLYCHLORINATED BIPHENYLS
 - ft bgs FEET BELOW GROUND SURFACE
 - mg/kg MILLIGRAMS PER KILOGRAM
- NOTES:**
1. SOIL CONCENTRATIONS IN mg/kg.
 2. LOCATIONS OF NR35-4 AND NR35-5 ARE APPROXIMATE.

SOURCES:
 KLENFELDER, 1994.
 KLENFELDER, 1995.
 MONTGOMERY WATSON, 2000

MONTGOMERY WATSON
 NR 38
 FORMER TEXACO OIL COMPANY TERMINAL
 508 OIL COMPANY ROAD
 ORGANIC CONSTITUENTS
 IN SOIL
 FIGURE 3

FIGURE #1



SITES

- NR1 UNION 76 GAS STATION (FORMER SITE)
1655 SILVERADO TRAIL
- NR2 NAPA GARBAGE SERVICE
400 CLAY STREET
- NR3 J.V. WAREHOUSE
428 FIRST STREET
- NR4 AL'S AUTO DISMANTLERS
1274 MCKINSTRY
- NR5 VALLEY TIRE AND BRAKE
844 FIRST STREET
- NR8 NAPA COUNTY CORPORATION YARD
833 WATER STREET
- NR7 REDEVELOPMENT AGENCY
(FORMER P.M. OUSEN PROPERTY)
1201 MAIN STREET
- NR8 BUS TRANSFER STATION
1151 PEARL STREET
- NR9 RIVERSIDE SERVICE
867 FIRST STREET
- NR10 VETERAN'S MEMORIAL PARK
800 MAIN STREET
- NR11 NAPA COUNTY FLOOD CONTROL AND
WATER CONSERVATION DISTRICT
EAST SIDE MAIN STREET BETWEEN
THIRD AND FOURTH STREETS
- NR12 NOYES LUMBER COMPANY
829 THIRD STREET
- NR13 CHEVRON GAS STATION (FORMER SITE)
795 SOSCOL
- NR14 BIG "O" PRODUCTS
705 SOSCOL AVENUE
- NR15 A. HATT BUILDING
550 MAIN STREET
- NR16 NAPA VALLEY ICE COMPANY
985 SIXTH STREET
- NR17 PALZIS PROPERTY
301 RIVER STREET
- NR18 END OF EIGHTH STREET
(FORMER BASALT ROCK CO. OIL TERMINAL)
903 EIGHTH STREET
- NR19 NORTH BAY OIL COMPANY
477 OIL COMPANY ROAD
- NR20 FRASER-EDWARDS PAVING COMPANY
415 OIL COMPANY ROAD
- NR21 FORMER COAL GASIFICATION PLANT
NW CORNER OF ELM AND RIVERSIDE
- NR22 SAWYER OF NAPA TANNERY
88 S. COOMBS STREET
- NR23 TANNERY ROW PROPERTIES
101 S. COOMBS STREET
- NR24 KRAINERT HEATING & AIR CONDITIONING CO.
182 S. COOMBS STREET
- NR25 NAPA COUNTY ANIMAL SHELTER
942 IMOLA AVENUE
- NR26 NAPA SANITATION DISTRICT
950 IMOLA AVENUE
(DREDGE SPILLAGE)
- NR27 NAPA SANITATION DISTRICT
950 IMOLA AVENUE
(FORMER LANDFILL)
- NR28 SUNSEN CONSTRUCTION COMPANY
1314 MCKINSTRY STREET
- NR29 OX-BOW INVESTMENT ASSOCIATION
540 FIRST STREET
(UNREPORTED LANDFILL)
- NR30 ACT CONSTRUCTION COMPANY
822 FIRST STREET
- NR31 FORMER PG&E YARD AND MACHINE SHOP
SOSCOL AVENUE AND FIRST STREET
- NR32 FORMER BLACKSMITH SHOP
1101 MAIN STREET
- NR33 FORMER PHILLIPS OIL TERMINAL
901 EIGHTH STREET
- NR34 NAPA VALLEY WINE TRAIN PROPERTY
800 EIGHTH STREET
- NR35 FORMER TEXACO OIL TERMINAL
508 OIL COMPANY ROAD
- NR36 FORMER ARCO OIL TERMINAL
100 OIL COMPANY ROAD
- NR37 FORMER EXXON OIL TERMINAL
385 OIL COMPANY ROAD

Contract IIB Sites

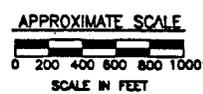


Figure 2
Contract IIB Site Location Map
Napa County Flood Control &
Water Conservation District
Napa, California