

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

ORDER NO. R2-2020-00XX

**RESCISSION OF SITE CLEANUP REQUIREMENTS ORDER NO. R2-1990-0147 for:
THE FORMER NAPA PIPE FACILITY**

for the property located at:

**1025 KAISER ROAD
NAPA, NAPA COUNTY**

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

SITE DESCRIPTION AND DISCHARGER

1. The former Napa Pipe Facility (facility) is located on a 150-acre site approximately three miles south of the city of Napa along the east bank of the Napa River (Figure 1). Industrial uses began at the site in the 1930s, including shipbuilding and manufacturing of steel, which ended when Napa Pipe Corporation ceased pipe fabrication in 2005. In late 2005, Napa Pipe Corporation sold the property to Napa Redevelopment Partners, LLC , who plan to redevelop the facility for mixed residential, commercial and open space uses.

SITE CONTAMINATION, CLEANUP ORDER, AND INVESTIGATIONS

2. The former facility operations resulted in contaminants of concern (COC) impacting soil and groundwater with total petroleum hydrocarbons in the diesel and motor oil/ hydraulic oil range, volatile organic compounds (VOCs), and localized elevated metals.
3. In 1990 the Regional Water Board issued Site Cleanup Requirements (SCR) Order No. 90-0147, which required Napa Pipe Corporation to submit a series of reports detailing actions proposed and implemented to contain and/or treat polluted groundwater and address the horizontal and vertical extent of soil contamination for treatment and/or disposal.
4. For purposes of investigation, the facility was divided into Sites 1 through 7 as described below:
 - a. Site 1 is maintained as a Class II waste management unit that is permitted and regulated under Waste Discharge Requirements Order No. R2-2005-0012. Site 1 is not subject to this Rescission and no remediation of Site 1 has been proposed as part of the site redevelopment plans.
 - b. Site 2/3 housed the external coating building (ECB) and an aboveground diesel fuel tank, which was connected to the former ECB via an underground pipeline. A release of diesel fuel occurred in this area in 1991, resulting in excavation of approximately 36 cubic yards of impacted soil. In 1993, a 40-foot long groundwater extraction trench was installed to

- hydraulically control groundwater flow and to prevent the migration of diesel fuel in groundwater.
- c. Site 4 was the location of a former wastewater treatment pond (WWTP), two former underground storage tanks, a maintenance garage, the former pipe mill building, and a paint storage building that was used as a combined equipment storage and hazardous materials/hazardous waste staging and storage area.
 - d. Site 5 was the location of a paint storage and structural fabrication building.
 - e. Site 6 includes the former machine shop area, the former drum storage area (including the former assembly bay, warehouse, and electrical/plumbing shop), and portions of the fabrication buildings. A 45-foot long groundwater extraction trench was installed on the north side of the former machine shop in October 1997 to hydraulically control groundwater flow and to prevent migration of COCs in groundwater.
 - f. Site 7 was never developed and is hydraulically upgradient of former site operations.
5. Soil and groundwater investigations and/or prior remedial activities at Site 5, Site 7, portions of Site 2/3 and the WWTP area of Site 4 have indicated that these areas did not have significant environmental impacts and no remedial actions were required.

RECENT REMEDIAL ACTIONS

6. A Remedial Action Plan was prepared by PES Environmental, and approved by the Regional Water Board in 2007, proposing cleanup of soil and groundwater to both residential and commercial standards based on proposed redevelopment plans. The Regional Water Board approved its Environmental Screening Levels (ESLs) as the cleanup standards for soil and groundwater. A subsequent Remedial Design and Implementation Plan (RDIP) was submitted in 2010 and updated in 2013, detailing methods by which soil and groundwater contamination would be remediated.
7. In accordance with the RDIP, remedial excavation and dewatering was implemented in areas with known impacts to soil and groundwater. Impacted groundwater was pumped and treated in the onsite WWTP prior to discharge to the sewer system and/or reused on-site as dust suppression under permit from the Regional Water Board. Excavated soils were segregated based on the type(s) of contaminants present. Soils that met residential cleanup goals were used as excavation backfill and/or stockpiled in facility areas zoned for residential development, and soils that only met commercial cleanup goals were used as excavation backfill or stockpiled in areas zoned for commercial development. Facility soils with residual chemical concentrations that exceeded commercial ESLs were characterized for waste disposal and transported to Class I & II state-licensed disposal facilities.
8. Implementation of the RDIP began at the facility in July 2017 and was completed in February 2018. During that time, a total of 156,645 cubic yards of soil were excavated, segregated, and stockpiled for landfarming, reuse, and offsite disposal. A total of 2,545,000 gallons of groundwater were removed and treated by the onsite wastewater treatment system. Post-remediation sampling and analysis confirmed that all contaminants in soil and soil vapor were at concentrations below their respective cleanup goals at the time the work was completed (October 2018).

9. The Regional Water Board issued a No Further Action (NFA) determination for the facility's soil and soil gas on May 29, 2019. In June 2019, additional groundwater samples were collected to determine if sitewide groundwater conditions met the appropriate cleanup standards per the approved RDIP. The Regional Water Board issued a second NFA letter for groundwater on September 3, 2019, with the conditions explained below.
10. In July 2019, new ESLs were established for many COCs that were present at the site. Concentrations of some VOCs in soil gas that were below the residential ESLs that were in effect at the time of cleanup now exceed the new, more stringent ESL numbers. Therefore, to ensure public and environmental health and safety are not compromised and as a condition of granting no further action, the Regional Water Board required installation of a vapor barrier under each residential unit to be constructed over locations (portions of the former Site 4 and 6, EX4-1 and EX-OA2- see Figure 2) where chemical concentrations in soil vapor and/or groundwater exceed the 2019 ESLs. Also, because of the presence of some residual groundwater contamination, the Regional Water Board required a deed restriction that prohibits the use of shallow groundwater. When future construction is taking place at the site, any remaining groundwater monitoring wells that were not previously destroyed prior to the soil excavations will be located and properly destroyed under permit from Napa County.
11. Napa Redevelopment Partners, LLC, prepared a deed restriction and filed it with Napa County in March 2020, recording the conditions required by our September 3, 2019 NFA letter.

CEQA, NOTIFICATION, AND PUBLIC COMMENT

12. Rescission of the Site Cleanup Requirements Order No. R2-1990-0147 for this site will have no potential for causing a significant effect to the environment and is therefore not subject to the California Environmental Quality Act (Public Resources Code § 21000 et seq.) pursuant to Title 14, Cal. Code Regs., § 15061(b)(3).
13. The Water Board has notified all stakeholders and interested agencies and persons of its intent to rescind site cleanup requirements contained in Order No. R2-1990-0147 and has provided them with an opportunity to submit their written views and recommendations, which have been considered.

NOW, THEREFORE, IT IS HEREBY ORDERED that Site Cleanup Requirements Order No. R2-1990-0147 is rescinded except for enforcement purposes.

I, Michael Montgomery, 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 Region on XXXXXX.

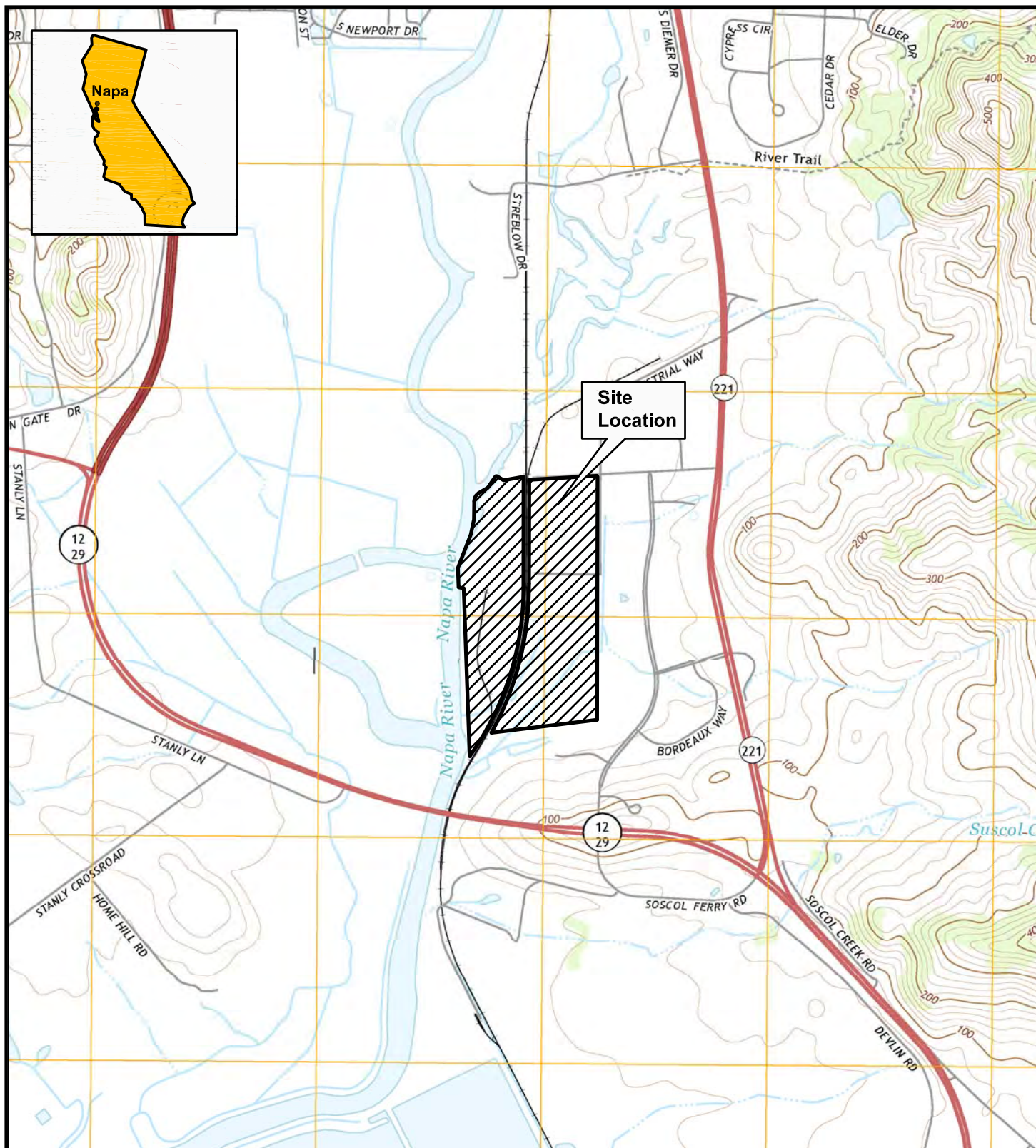
Michael Montgomery
Executive Officer

Order No. R2-2020-00XX
Rescission of Site Cleanup Requirement Order No. R2-1990-0147
Former Napa Pipe Facility

Attachments:

Figure 1- Site Location Map

Figure 2- Site and Excavation Plan



SOURCE: USGS 7.5' QUADRANGLES, NAPA/CUTTINGS WHARF, CALIFORNIA, 2015



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Site Location Map
Former Napa Pipe Facility
1025 Kaiser Road
Napa, California

Figure

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