



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
Underground Storage Tanks Program Office  
75 Hawthorne Street (WST-8)  
San Francisco, CA 94105

June 10, 2011

Mr. James Newman, P.G.  
Napa County Department of Environmental Management  
Local Oversight Program  
1195 Third Street, Suite 101  
Napa, CA 94559-3082

**Subject: Submission of Final Report – Review of Leaking Underground Storage Tank (LUST) Cases, Non Clean-up Fund, Open > 15 Years, Not Ready for Closure as Follow-up to the May 18, 2011 Meeting.**

Dear Mr. Newman:

We are sending you the enclosed copy of the Final Report – *Review of Leaking Underground Storage Tank (LUST) Cases, Non-Clean-up Fund, Open > 15 years*, for your files. This final report includes revisions to the draft final report based on comments received from your staff. A copy of the final version of this report has also been sent to the State Water Resources Control Board (SWRCB). This report was prepared as an “In-Kind” task and part of a cooperative agreement between USEPA Region 9 and the State Water Resources Control Board (SWRCB).

We appreciate the timeliness and professionalism you and your agency afforded us in the interview and draft report review process.

If you have any questions related to this matter, you can contact me at: (415) 972-3530 or via email at [Coffman.Joel@epa.gov](mailto:Coffman.Joel@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Joel Coffman".

Joel Coffman, P.G.  
Environmental Scientist  
Underground Storage Tanks Program

Attachments: Final Report

Cc: Kevin Graves, California State Water Resources Control Board  
Steven Linder, US EPA Region 9

# **Final**

**June 10, 2011**

**Review of  
Leaking Underground Storage Tank Cases  
Not in Cleanup Fund and Open Over 15 Years  
Napa County Local Oversight Program Agency**

**Prepared as in-kind task as part of Cooperative Agreement LS-  
96934701-1 between U.S. EPA Region 9 and the California State Water  
Resources Control Board**

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## **Executive Summary**

The Draft version of this report was submitted on September 1, 2010, with a request for a follow-up meeting and input from Napa County LOP into the “Next Steps for Agency” column of the case cleanup status spreadsheet.

Napa County LOP met with USEPA Region 9 and Sullivan International Group, Inc. in a teleconference meeting on May 18, 2011 to discuss the draft report and their next steps for each case. The agency acknowledged several challenges with these cases. A few of the challenges mentioned by Napa County LOP is a responsible party that is not motivated to conduct the necessary work in a reasonable timeframe.

During the meeting, Napa County LOP mentioned that one of the cases, City of Napa Soscol Street Sidewalk (T0605575085), was not opened as a LUST case until 2006 so they did not believe that the case qualified as an “aging” case. USEPA and Sullivan explained that the query looked at the leak report date as the day in which GeoTracker realizes the age of cases; not the date in which a particular agency takes oversight responsibility for the case.

# Napa County LOP

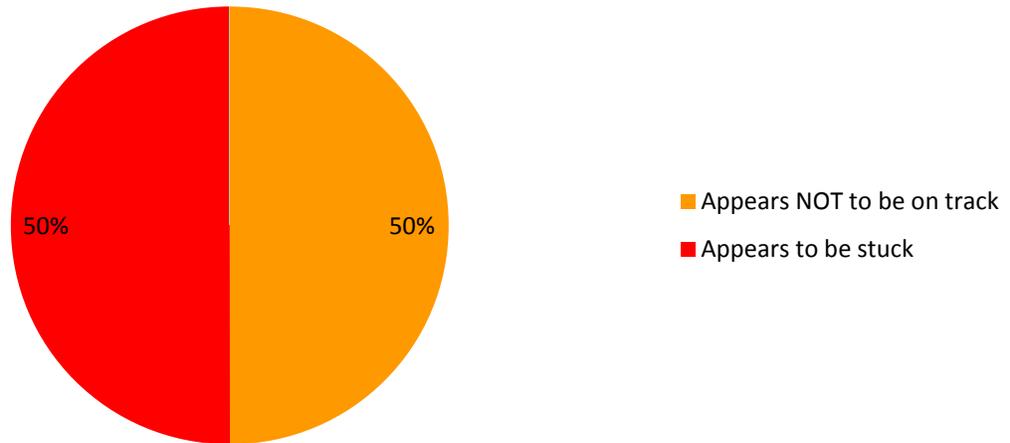
## Apparent Case Status: Initial and After

TOTAL NUMBER OF CASES REVIEWED = 2  
 NUMBER OF ACTIVE LUST CASES ON NOVEMBER 1, 2010 = 47 CASES  
 DRAFT REVIEW REPORT PREPARED AND SENT TO AGENCY ON September 1, 2010  
 MEETING WITH AGENCY ON May 18, 2011

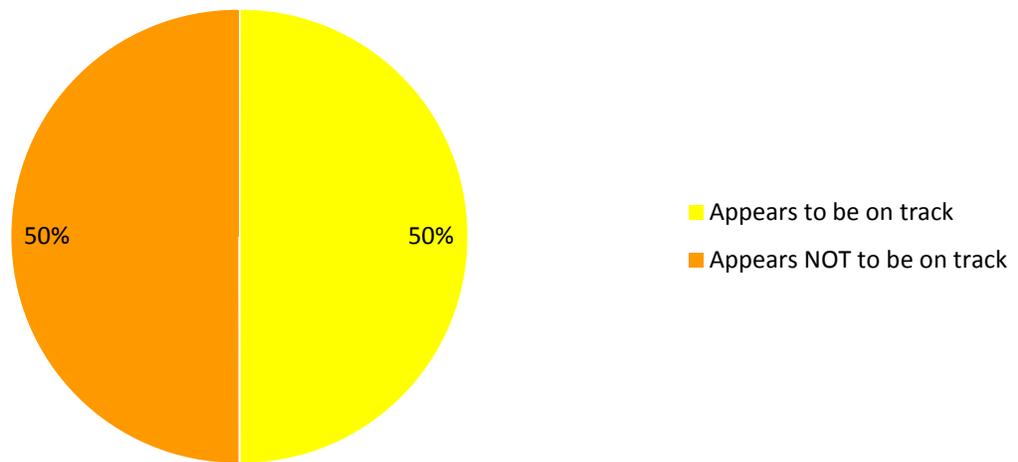
APPARENT STATUS OF CASES REVIEWED – INITIAL REVIEW AND AFTER MEETING TO DISCUSS CASES

Apparent Case Status	Initial Assessment Number of Cases (09-01-2010)	Post Meeting Assessment Number of Cases (05-18-2011)
CASE CLOSED	0	0
Appears near completion within 1-year	0	0
Appears close to completion	0	0
Appears to be on track	0	1
Appears NOT to be on track	1	1
Appears to be stuck	1	0
Unable to determine (Insufficient information in GeoTracker)	0	0
NOT FEDERAL UST CASE	0	0
OTHERS - Not Non-CUF, Older than 15-years Case	0	0

### Initial Assessment Percentage of Cases (09-01-2010)



### Post Meeting Assessment Percentage of Cases (05-18-2011)



Aging Non-CUF Case Summary Review Table

ESTIMATED STATUS IN THE CLEANUP PIPELINE? (09-01-2010)	CHANGE IN STATUS IN THE CLEANUP PIPELINE (BASED ON MEETING/CALL WITH AGENCY) ON 05/18/2011	SITE NAME (CASE LEAD AGENCY: NAPA COUNTY LOP)	GLOBAL ID	CASE WORKER	PRIMARY COC (In GeoTracker)	APPARENT TYPE OF RP	RELEASE DATE	DISCUSSION NOTES FROM MEETING/CALL (05-18-2011)	NEXT STEPS FOR AGENCY
Appears NOT to be on track	Appears to be on Track	CITY OF NAPA SOSCOL STREET SIDEWALK	<a href="#">T0605575085</a>	JTN	Multiple	G - Government Entity (include School, Hospital, Utility)	3/30/1987	Caseworker indicated that he and his agency believed that the official opening of the case was conducted in 2006 which would make this case not qualify for being over 15 years. The case was the Regional Board's responsibility from 1987 through 2005 but the case was dormant until Napa County made this case an active site. The caseworker indicated the the next phase of the site investigation will occur during the first quarter of the State's New Fiscal Year (between July 2011 and September 2011). The caseworker indicated that this case would not qualify for the Cleanup Fund. The caseworker believes this case is on Track but GeoTracker does not show this. The caseworker agreed to ensure that consultant upload the necessary documentation to GeoTracker.	Update missing GT information (data, report, unassigned caseworker etc.)
Appears to be stuck	Appears NOT to be on track	NAPA MILL HATT BUILDING	<a href="#">T0605500098</a>	JTN	Gasoline	O - Other (Individual, Homes etc)	4/28/1987	The Caseworker indicated that he has concerns about VI intrusion at the site. The consultants noted smell of gasoline occasionally. The Caseworker agreed that he did not think this case was on Track, primarily because of the RP who is slow to take action and there are high concentrations of benzene. A recent work plan for a vapor extraction pilot test has been approved. Work is being done at the site but just slower than the caseworker would like. The caseworker also believes that the case should be entered into the FUND and said that the RP claimed that he tried to enter the case into the FUND but that he was not accepted. The caseworker also agreed that he would ensure that the consultant upload all the necessary documentation into GeoTracker. The caseworker noted that if work described in the pilot work plan is conducted then he would consider the case status to be "Appears to be on Track".	Update missing GT information (data, report, unassigned caseworker etc.)

## **Attachment 1:**

### **Case Review Power Point Slides from Draft Report**

The contents of this attachment are provided in electronic format only.

**CITY OF NAPA SOSCOL STREET SIDEWALK (T0605575085)**

645 SOSCOL STREET, NAPA, CA 94559

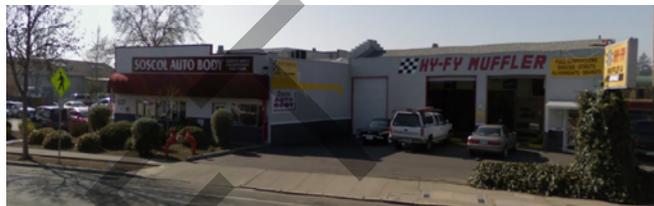


Case Age: 23 Years  
 Primary COC: DIESEL, GASOLINE, WASTE OIL /  
 MOTOR / HYDRAULIC / LUBRICATING  
 RP Identified : Public Works Dept. (City of Napa)  
 Current Land Use: City Right-of-Way

MAP THIS SITE	OPEN - SITE ASSESSMENT
<b>CLEANUP OVERSIGHT AGENCIES</b>	
NAPA COUNTY LOP (LEAD) - CASE #: 0333	
CASEWORKER: <a href="#">James Newman, P.G., C.E.G.</a> - SUPERVISOR: NONE SPECIFIED	
SAN FRANCISCO BAY RWQCB (REGION 2)	
CASEWORKER: <a href="#">KENT AUE</a> - SUPERVISOR: MARY ROSE CASSA	

**Why Is This Case So Old**

- Discovered in 1987, tanks removed in March 1987, initial soil samples were collected from tank excavations after removal.
- No investigation or remedial work was conducted between 1987 and 2008; site remained inactive.
- High concentrations of petroleum hydrocarbons detected at adjacent site: and potential commingled plumes with subject site
- Within a 1000 ft radius of a drinking water well or surface water body used as a source of drinking water.



NOTE: Data queried from GeoTracker and reviewed in August 2010

## Activities Conducted to Date Based on Geotracker Info (T0605575085)

**Assessment last 5 years**

- Shallow Soil gas sampling conducted in March 2008
- Soil and Groundwater sampling conducted in June 2008
- Additional 4 soil borings were advanced in 2009 and three monitoring wells were installed (MW-1, MW-2, and MW-3). Grab groundwater samples were collected from each boring.
- Groundwater samples are collected on a quarterly basis.

**Remediation last 5 years**

- NONE DOCUMENTED

**Assessment older than 5 years**

- Soil sampling was conducted at the time of UST removal

**Remediation older than 5 years**

- Six USTs were removed from the site in 1987

# IMPEDIMENTS TO CLOSURE (T0605575085)

as reported by regulatory agency

## SITE ASSESSMENT INCOMPLETE

- Extent of Contamination Has Not Been Determined - *work plan submitted for further characterization*

## PLUME INSTABILITY

- Groundwater Contamination Plume Not Stable or Decreasing: *Unknown*

## GROUNDWATER IMPACTS

- Groundwater Impacted Above Other Cleanup Goal - *Significant impacts above ESL's*

## BENEFITS OF ADDITIONAL WORK

- Fill-in RI Data Gaps - *site characterization is incomplete*
- Remove / Reduce Source Mass - *significant contamination on site. no remediation is selected at this time*
- Restore Beneficial Uses: *groundwater has high concentrations of TPH range organics.*

### SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTORS	TIME FRAMCE FOR IMPACT	COMMENTS
Groundwater	Already Impacted	"x"

## Review Conclusions T0605575085

- The Site was inactive from the time of tank removal in 1987 until 2008 when site assessment resumed.
- Maximum concentrations of 180,000 mg/kg of TPHd and 84,000 mg/kg of TPHg were detected in grab groundwater samples in 2008.
- Chromatograms of the contaminants indicate that "gasoline does not appear to be the primary source of observed contamination," but rather, "the data strongly suggests the presence of a specialty non-aromatic solvent." The site might better be characterized as a cleanup program site if this is the case.
- Petroleum contamination appears to be degrading
- Consultant recommended that vertical and lateral extent of contamination of the plume be further characterized.
- The plume from this site is potentially co-mingled with the plume associated with the adjacent site at 657 Soscol Ave.

*Discussion: (1) Potentially open up a cleanup program site for potential non-petroleum solvents at site. (2) Consider remediation measures instead of or in addition to monitoring to move case towards closure. (3) Evaluate whether site meets low-risk closure criteria. (4) Schedule meeting between RP, LOP and RWQCB to discuss steps to move site toward closure.*

**NAPA MILL HATT BUILDING (T0605500098)**  
550 Maine St. Napa, CA 94559, Napa County



Case Age: 23  
Primary COC: Gasoline  
RP Identified by Regulator: Napa Mill  
Development Company  
Current Land Use: Commercial

**OPEN - SITE ASSESSMENT**

**CLEANUP OVERSIGHT AGENCIES**

NAPA COUNTY LOP (**LEAD**) - CASE #: 0273

CASEWORKER: [James Newman, P.G., C.E.G.](#) - SUPERVISOR: NONE SPECIFIED

SAN FRANCISCO BAY RWQCB (REGION 2) - CASE #: 28-0106

CASEWORKER: [KENT AUE](#) - SUPERVISOR: MARY ROSE CASSA

**Possible Reasons Why This Case Is So Old**

- Tanks removed in 1986
- Not all reports have been submitted in GeoTracker
- NCDem issued a letter in 2002 indicating no further action or active remediation regarding petroleum hydrocarbons were necessary as long as ground water monitoring for wells MW-7, MW-10, MW-11 & MW-12 would continue.
- No GW data since 2005 and little enforcement from NCDem
- Within a 1000 ft radius of a drinking water well or surface water body used as a source of drinking water.



NOTE: Data queried from GeoTracker and reviewed in August 2010

**Activities Conducted to Date Based on GeoTracker Info  
(T0605500098)**

**Assessment last 5 years**

- GW Monitoring in 2005
- Maintenance of monitoring wells led to discovery of free product within MW-4 and that MW-3 & MW-6 contain electrical wires and sensors.

**Remediation last 5 years**

- No active remediation documented

**Assessment older than 5 years**

- Subsequent to removal of UST's, 12 monitoring wells were installed.
- Inconsistent GWM from time of installation till 2002.

**Remediation older than 5 years**

- Two UST's were closed and removed from the site in 1986
- Injection of Oxygen Release Compound beneath Lot 4 of site to remediate petroleum hydrocarbons.
- Periodic removal of floating product from passive skimmers

# IMPEDIMENTS TO CLOSURE (T0605500098)

as reported by regulatory agency

## SITE ASSESSMENT INCOMPLETE

- Incomplete Conceptual Site Model (CSM): "x"
- Potential Risks, Threats, And Other Environmental Concerns Have Not Been Adequately Identified And Assessed - *Vapor Intrusion may be an issue*

## PLUME INSTABILITY

- Groundwater Contamination Plume Not Stable or Decreasing: *unknown*

## GROUNDWATER IMPACTS

- Groundwater Impacted Above Other Cleanup Goal - *High levels of benzene in GW below building*

## UNACCEPTABLE RISK

- Unacceptable Risks to Human Health from Vapor Intrusion: *unknown*

## PROCEDURAL IMPACTS

- Non-Responsive and / or Recalcitrant Responsible Party - *No response to letter to resume remediation*

## BENEFITS OF ADDITIONAL WORK

- Fill-in RI Data Gaps: "x"
- Complete CSM and Our Understanding of Hydrogeologic Regime and Fate and Transport of Contaminants: "x"
- Restore Beneficial Uses: "x"
- Protect Human Health: "x"

## SENSITIVE RECEPTORS LIKELY TO BE IMPACTED AND TIME FRAME FOR IMPACT

SENSITIVE RECEPTORS	TIME FRAMCE FOR IMPACT	COMMENTS
Groundwater	Already Impacted	"x"
Indoor Air (Residential or Commercial)	Undetermined	"x"

## Review Conclusions T0605500098

- Site was redeveloped during hotel and retail construction on Lot 4 in conjunction with installation of 12 ground water monitoring wells.
- Injected Oxygen Release Compound beneath Lot 4 to remediate petroleum hydrocarbons in gw in this area.
- NCDDEM issued a letter in 2002 indicating no further action or active remediation regarding petroleum hydrocarbons as long as gw monitoring continued. Consultant stated that NCDDEM agreed with monitoring plan only for wells MW-7, MW-10, MW-11, and MW-12. Concurrence letter not in GeoTracker.
- In 2007 NCDDEM requested a full account of the status of all 12 gw monitoring wells.
- GeoTracker does not have all documents and enforcement letters for this case.
- MW-4 has historically contained free product and consultant is required to remove free product from this well on a regular schedule. No update on the status of this well in the last 3 years and if there is remaining free product.
- Work plan was submitted in 2007 for the destruction of monitoring wells 1,2,3,5,6,8,9 by pressure grouting due to construction nearby.
- Flood Wall construction lead to MW-3, MW-6 containing electrical wires and sensors
- 08/2009 NCDDEM issued a directive to resume gw monitoring for all wells related to the site and analyze for TPH-d, TPH-g, BTEX; prepare and submit a report for future activities relating to vapor intrusion, monitoring well sampling frequency, and recommendations to abandon wells; and to submit all monitoring reports to NCDDEM and to upload all reports to GeoTracker. No additional reports have been uploaded into GeoTracker which indicate RP Compliance.
- *Discussion: (1) Improve on Agency Enforcement and RP compliance (2) Next steps for moving this case towards closure; currently not on track for closure, is additional monitoring necessary? (3) Schedule meeting with RP, LOP and RWQCB to discuss additional work required to move site towards closure, including assessment of vapor intrusion, if needed. (4) Consider transferring case to RWQCB for enforcement and oversight.*