

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

**ORDER NO. 00-107
REVISED SITE CLEANUP REQUIREMENTS FOR:**

**PHILLIPS PETROLEUM COMPANY
TEXACO, INC.
JAMES AND VICTORIA ASBURY**

for the property located at

**901 EIGHTH STREET
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 Phillips Petroleum Company property (hereinafter referred to as the Site) is approximately 27,500 square feet in area, and is located at 901 Eighth Street in Napa County (see Figure 1). The Site is bordered on the north by industrial development, on the south by undeveloped land, on the east by the Wine Train Property, and on the west by the Napa River. Land use within a half-mile of the Site is a mix of commercial/ industrial and residential, interspersed with undeveloped and agricultural properties.
2. **Site History:**
 - a. From July 11, 1924 until July 16, 1966, the Site was owned and operated by Associated Oil as a bulk fuel distribution facility. Five above ground fuel storage tanks ranging from 17,000 to 165,000 gallons in capacity were located on the southern part of the Site.
 - b. Some time prior to 1966 Tidewater Oil acquired the property from Associated Oil. Tidewater Oil was reportedly acquired by Getty Oil Company, which in turn was acquired by Texaco, Inc.
 - c. On July 16, 1966, Phillips Petroleum Company acquired ownership of the property and continued operation of the bulk fuel distribution and above ground tank facilities. On April 7, 1974, Phillips Petroleum Company removed the five above ground storage tanks from the property.
 - d. The Site was occupied by Bell Products from 1974 to 1975, the Napa County Council of Equal Opportunity from 1975 to 1977, Consolidated Landscape Services from 1977 to 1985, Associated Roofing from 1986 to 1989, and Industrial Plumbing from 1989 to the present.

- e. On December 1, 1987 James L. and Victoria E. Asbury acquired title to the property.
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 an innovative project designed to bring flood protection, watershed management, and environmental restoration to the entire Napa River Valley and enhance the 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 restoring 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 approach 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. **Named Dischargers:** Phillips Petroleum Company and Texaco, Inc. are named as dischargers because they are the prior owner and operator of the facility and based upon past chemical usage and operations described in finding 2 above.

James and Victoria Asbury are named as dischargers because they are the current property owners. James and Victoria Asbury will be responsible for compliance only if the Board or Executive Officer finds that other named dischargers (Phillips Petroleum Company and Texaco, Inc.) have 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.

5. **Regulatory Status:** This Site is currently not subject to Board order. However, the Site is conducting an interim remedial action under the requirements of a Section 13267 letter, which was issued to Phillips Petroleum Company on July 28, 1999.
6. **Site Hydrogeology/ Geology:** Shallow groundwater underlying the Site occurs at approximate depths of 10 to 22 feet. A tidal study for the Site was conducted on November 9, 1999 to evaluate the fluctuation in groundwater elevation in relation to the tidal variations in the Napa River. Data was collected over a twelve hours period to include both high and low tide changes in the river. The study indicated that a 3.7 feet difference between the high and the low tide cycles. A review of the boring logs for the four monitoring wells and the Fluor Daniel-GTI borings was performed. The lithology encountered at the Site consisted primarily of silt to the total depth of the borings (20 to 25 feet below grade). A notable increase in clay content was observed with depth.
7. **Remedial Investigation:** During January 1993, Kleinfelder, Inc. conducted a site investigation for the U. S. Army Corps of Engineers that included drilling four soil borings at various locations at the Site. Total petroleum hydrocarbons as diesel were detected in two of the borings at concentrations ranging from 80 to 230 ppm. Benzene was detected in two of the borings at concentrations ranging 0.00741 to 0.0453 ppm.

During March 1997, Fluor Daniel GTI conducted a limited soil and groundwater investigation at the Site, and concluded that the southern half of the Site was impacted by hydrocarbons. Soil samples collected from the three borings contained TPHg concentrations ranging from 5.8 to 18 ppm, benzene concentrations ranging from ND to 0.14 ppm, and TPHd concentrations form 9 to 74 ppm. Groundwater collected form each of the three borings contained TPHg concentrations ranging from ND to 14,000 ppb, and benzene concentrations ranging from ND to 40 ppb. The results of this investigation are documented in the Fluor Daniel GTI Report (April 1997, Subsurface Investigation Report, Former Bulk Terminal, 901 Street, Napa, California).

During March 2000, Cambia Environmental Technology, Inc. investigated the Site, and submitted its findings in a report titled "Site Investigation Report and Remedial Action Plan" to the Board. The report showed that groundwater beneath the property has been impacted with petroleum hydrocarbons. The highest concentrations of total petroleum hydrocarbon in the diesel and gasoline ranges in groundwater were up to 363,000 ppb and 2,860,000 ppb, respectively. The report also indicated that Benzene was detected in boring SB-8 up to 4,210 ppb. The concentration of total petroleum hydrocarbon in the diesel range in soil was reported to be up to 1,550 ppm. In accordance with the investigative reports, which have been submitted to the Board, the extent of plume has been defined, and groundwater data are indicative of contaminant plume migration off-site. The groundwater plume originating at this site is impacting the water quality of the Napa River and groundwater quality of the neighboring properties especially those located to the south.

8. **Nearby Sites:** The Napa Valley Wine Train property is located adjacent to the east and southeast of the former Phillips Oil Terminal. The former Basalt Rock (now known as the Dillingham Construction of North America, Inc.) is located to the north of the property.
9. **Interim Remedial Measures:** In accordance with the approved scope of work in the Corrective Action Plan dated March 24, 2000, two rounds of excavation activities were performed at this Site. The proposed areas were excavated to 10 feet below grade, and confirmation sidewall samples were collected.

Based on the first round of excavation, it was decided that the excavations should extend primarily in the northerly and southerly directions. Thus, the southern excavation was extended to the south, about ten additional feet (to 5 ft below grade), the area between the two original areas was excavated (to 5ft below grade) and the area to the north of the northern pit was extended about 10 feet (to 5 ft below grade). The additional excavation was only extended to a depth of 5 feet below grade in an effort to remove impacted surface soils that exists above the "smear zone". Basically, confirmation sidewall samples from a depth of 5 feet below grade showed: benzene was not detected in any of the sidewall samples. TPH-g concentrations ranged from <1.0 up to 330 ppm. TPH-d concentrations ranged from <1.0 up to 6,800 ppm. A total of approximately 450 cubic yards of impacted soil was hauled to Forward Landfill for disposal and the excavation areas were backfilled. Despite these interim remedial activities high levels of residual hydrocarbon constituents are still present in soil and groundwater beneath the property. The residuals, which are left behind in the subsurface are currently impacting quality of waters of the State, and migrating off-site.

10. **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 ground waters.

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
- i. Preservation of rare and endangered species

11. **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.

12. **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.

13. **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:

Medium	TPHg	TPHd
a. 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.

14. **Adverse Effects on Beneficial Uses of the Napa River:** Petroleum hydrocarbons are found at high concentrations in shallow groundwater at this site. These constituents are able to migrate readily in groundwater. 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.
15. **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.
16. **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.
17. **CEOA:** 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.

18. **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.
19. **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 2 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. 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").

- 3. 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).

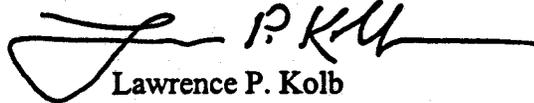
7. **Technical Documents:** All technical reports submitted in compliance with this Order shall be satisfactory to the Executive Officer, and, if necessary, the Dischargers may be required to submit additional information.
8. **Document Distribution:** Copies of all correspondence, technical reports, 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

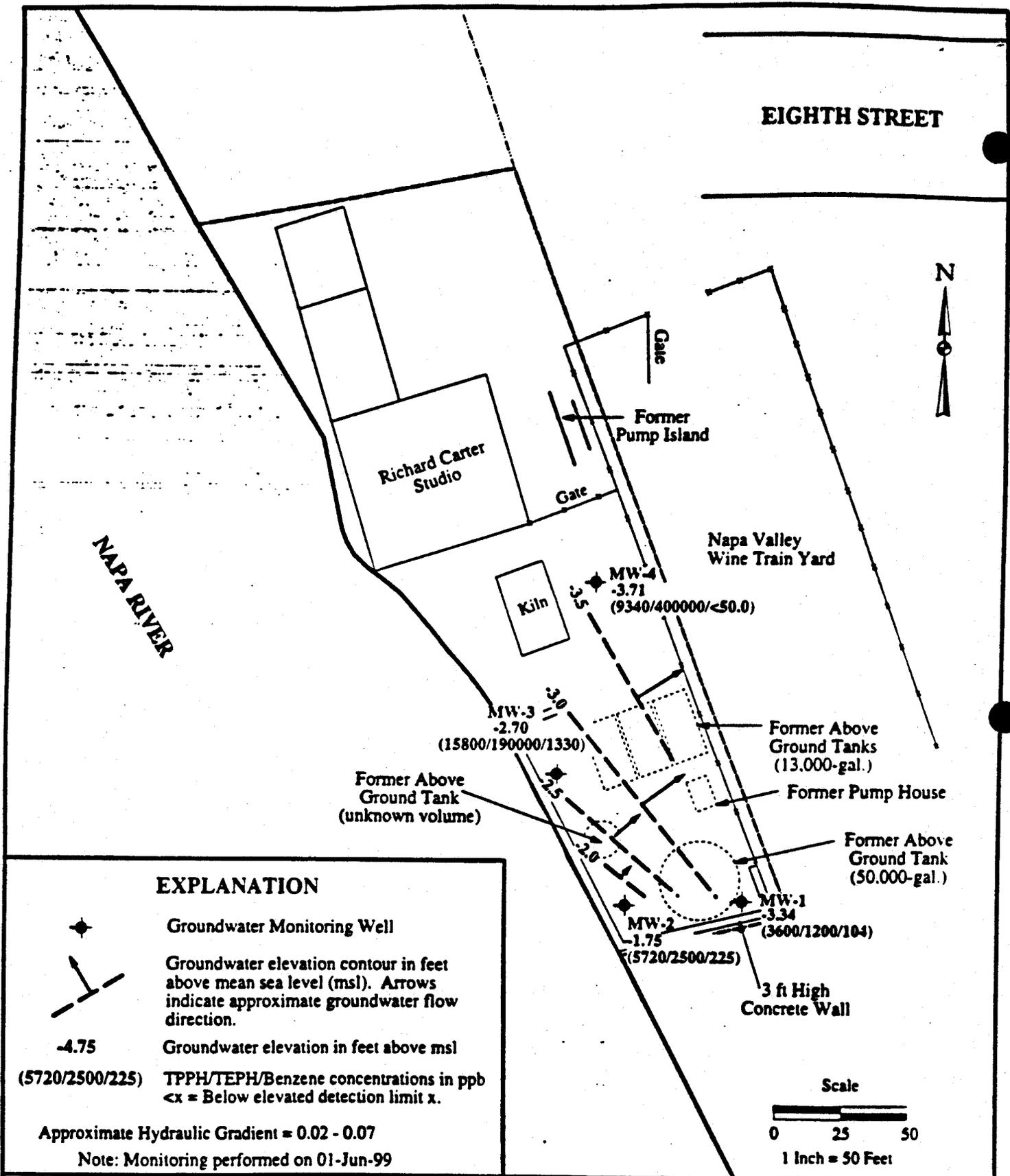


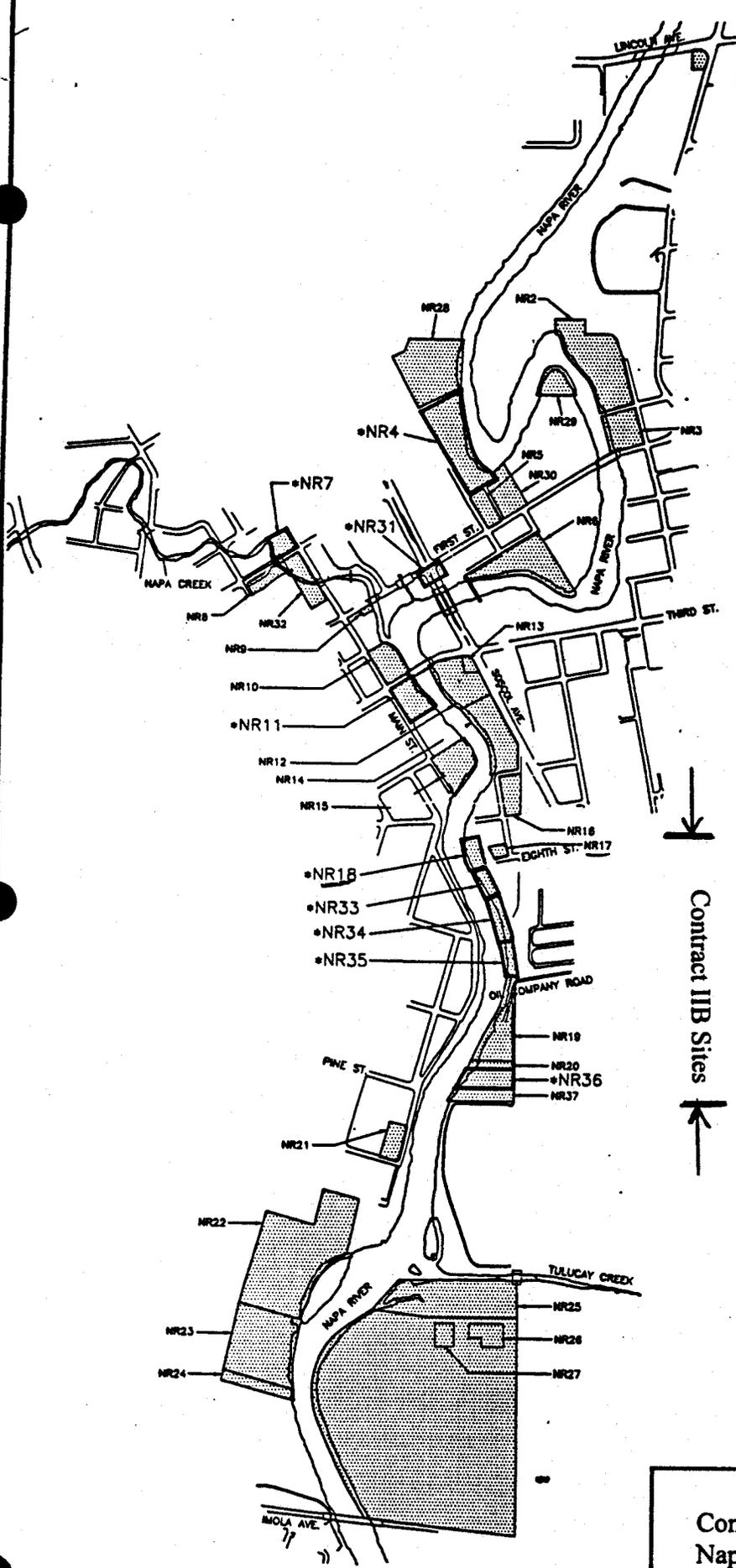
Figure 1

Site Location Map
Former Phillips Petroleum Terminal
901 Eighth Street
Napa, California

CAMBRIA
241-1375

Drawn By: AKC Date: 28-Jun-99

Approved By: _____ Date: _____



SITES

- NR1 UNION 78 GAS STATION (FORMER SITE)
1855 SILVERADO TRAIL
- NR2 NAPA BARBQUE SERVICE
400 CLAY STREET
- NR3 J.V. WAREHOUSE
428 FIRST STREET
- NR4 AL'S AUTO DISMANTLERS
1274 McCONSTRY
- NR5 VALLEY TIRE AND BRAKE
844 FIRST STREET
- NR6 NAPA COUNTY CORPORATION YARD
833 WATER STREET
- NR7 REDEVELOPMENT AGENCY
(FORMER P.M. GLENN PROPERTY)
1201 MAIN STREET
- NR8 BUS TRANSFER STATION
1181 PEARL STREET
- NR9 RIVERSIDE SERVICE
847 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 HOYES LUMBER COMPANY
828 THIRD STREET
- NR13 CHEVRON GAS STATION (FORMER SITE)
795 BOSCOL
- NR14 BIG "J" PRODUCTS
705 BOSCOL AVENUE
- NR15 A. HATT BUILDING
850 MAIN STREET
- NR16 NAPA VALLEY ICE COMPANY
845 SOUTH STREET
- NR17 PALZIS PROPERTY
301 RIVER STREET
- NR18 END OF EIGHTH STREET
(FORMER BASALT ROCK CO. OIL TERMINAL)
803 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
68 S. COOMBS STREET
- NR23 TANNERY ROW PROPERTIES
101 S. COOMBS STREET
- NR24 KRANERT HEATING & AIR CONDITIONING CO.
162 S. COOMBS STREET
- NR25 NAPA COUNTY ANIMAL SHELTER
842 MIOLA AVENUE
- NR26 NAPA SANITATION DISTRICT
850 MIOLA AVENUE
(DREDGE SPILLAGE)
- NR27 NAPA SANITATION DISTRICT
850 MIOLA AVENUE
(FORMER LANDFILL)
- NR28 SLINSEN CONSTRUCTION COMPANY
1314 McCONSTRY STREET
- NR29 OX-BOW INVESTMENT ASSOCIATION
840 FIRST STREET
(UNREPORTED LANDFILL)
- NR30 ACT CONSTRUCTION COMPANY
822 FIRST STREET
- NR31 FORMER PGE YARD AND MACHINE SHOP
SOSCOL AVENUE AND FIRST STREET
- NR32 FORMER BLACKSMITH SHOP
1161 MAIN STREET
- NR33 FORMER PHILLIPS OIL TERMINAL
801 EIGHTH STREET
- NR34 NAPA VALLEY WINE TRAIN PROPERTY
800 EIGHTH STREET
- NR35 FORMER TEXACO OIL TERMINAL
808 OIL COMPANY ROAD
- NR36 FORMER ARCO OIL TERMINAL
100 OIL COMPANY ROAD
- NR37 FORMER EXXON OIL TERMINAL
385 OIL COMPANY ROAD

Contract IIB Sites

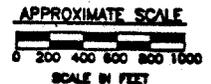
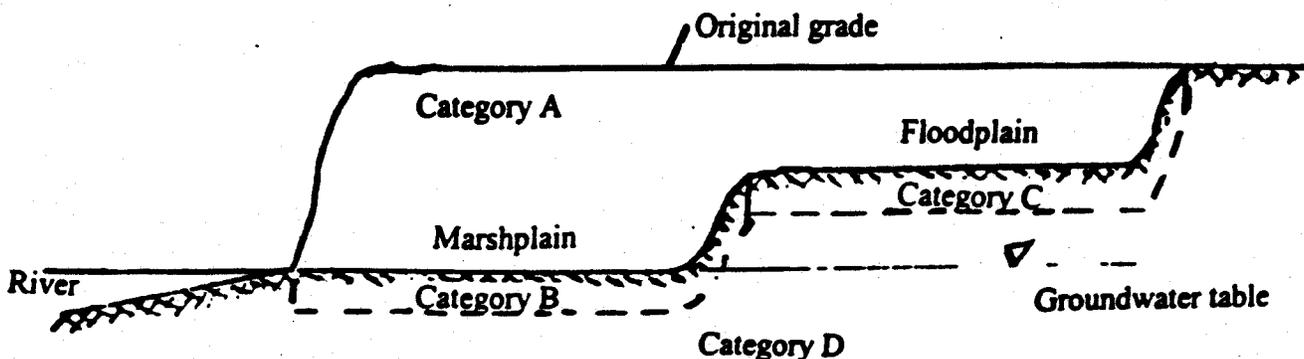


Figure 2
Contract IIB Site Location Map
Napa County Flood Control &
Water Conservation District
Napa, California

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