

CALIFORNIA ENVIRONMENTAL QUALITY ACT  
NEGATIVE DECLARATION

Department of Toxic Substances Control  
Site Mitigation & Restoration Program  
8800 Cal Center Drive  
Sacramento, CA 95826

Subject:     DRAFT  FINAL         MITIGATED

Project Title: Former Napa-1 Manufactured Gas Plant Remedial Action Plan

State Clearinghouse No.: 2021070071

Project Location: Operable Unit 1 – 201-267 Riverside Drive, and Operable Unit 2 – 1050 Elm Street, Napa, CA 94559

County: Napa

Project Description: The Department of Toxic Substances Control (DTSC) is proposing to approve a Feasibility Study and Remedial Action Plan (FSRAP) for the Former Napa-1 Manufactured Gas Plant (MGP) Site (Site) located at 201, 211, 221, 241, 251 and 267 Riverside Drive, Napa, California pursuant to regulatory authority granted under Chapter 6.8, Division 20, sections 25323.1 and 25356.1, California Health and Safety Code (H&SC). The FSRAP addresses impacts to soil and groundwater from previous operations at the Site. The Site and surrounding areas have been separated into three operable units (OU) as shown on Figure 1 to facilitate remedial action planning, cleanup activities, post remedial action certification, and closure of the project. OU-1 includes the on-site area encompassing the current PG&E property and virtually all of the former Napa-1 MGP footprint. OU-2, also part of the project, is an off-site area that includes a portion of the Elm Street Townhomes property adjacent to the west of the Site. OU-3, also an off-site area, includes the public right-of-way (ROW) along the Napa River including Riverside Drive, and the adjacent Riverside Park (upper riverbank area) to the east of the Site.

Although Operable Unit 3 is addressed in the draft FSRAP and Initial Study, OU-3 is no longer considered part of the project and will be removed from the final FSRAP. DTSC has determined that selection of the final remedy for OU-3 should be deferred until after Napa County Flood Control and Water Conservation District (District) finalizes its plans for the component of the Napa River/Napa Creek Flood Protection Project that includes the OU-3 area. Consequently, OU-3 is no longer considered part of the project.

The Site (OU-1) covers approximately 1.3 acres northwest of the intersection of Elm Street and Riverside Drive (Attachment B- Figure 1) and is comprised of two relatively flat parcels with Assessor's Parcel Numbers (APN's) 005-123-006-000 and 005-123-011-000. The physical

address for the Site is 201, 211, 221, 241, 251, and 267 Riverside Drive, Napa, California. The Site is owned by PG&E, currently vacant, and surrounded by chain link fencing covered with sound proofing blankets. Current Site use is primarily limited to infrequent sampling activities. Ground surface elevations vary from about 14 to 18 feet above mean sea level (amsl) based on the North American Vertical Datum of 1988 (NAVD88). The Site is bounded by multi-family residential buildings to the north and west, Riverside Drive to the east and Elm Street to the south. South of Elm Street, single and multi-family residential buildings are present. Immediately east of Riverside Drive is Riverside Park, an existing narrow linear City-owned park that runs along the west side of the Napa River from the downtown area to south of the Site. The portion of Riverside Park adjacent to the Site is considered the upper riverbank, and there is a steep embankment from the upper riverbank down to the Napa River.

OU-2 consists of multifamily homes and is located adjacent to the west side of the Site. It includes 1060, 1062, 1064, 1066, 1068, and 1070 Elm Street within APN 005-123-013-000. The parcel is privately owned.

The former MGP operated from approximately 1889 to 1924. The MGP initially used coal as its feedstock, but in 1902 the plant was replaced with an oil-gas facility that operated until 1924, when the MGP shut-down. PG&E, formerly California Gas and Electric Company, owned the Site from 1903 through 1961, when PG&E sold the property. An apartment complex consisting of 40 units was constructed in 1963. PG&E re-acquired ownership of the Site in 2010, at which time PG&E entered into a voluntary cleanup agreement with DTSC, and the apartment complex tenants were re-located. The apartment complex was demolished in 2011. The current ground cover at the Site is mainly concrete and asphalt, with some limited areas of exposed soil. Since 2011, the Site has been vacant and unoccupied with activities limited to environmental assessments by PG&E and their consultants.

Environmental assessment of the Site began in 1986 and has included multiple investigations to evaluate subsurface soil, soil vapor, and groundwater conditions at the Site and immediate vicinity. Data collected during these investigations provided the necessary information to perform a human health risk assessment (HHRA) and a Screening Level Ecological Risk Assessment, as well as an evaluation of potential remedial measures in the FSRAP.

### **Project Activities**

The FSRAP proposes the following remedial actions to address the contaminants of concern in soil and groundwater at the Site:

- Targeted soil excavation will be conducted at OU-1 in localized hot spots to depths up to 15 feet below ground surface (bgs), and at OU-2 in select backyard and the common area to depths up to 4 feet bgs in areas where impacted soil has been detected. Excavated soil will be hauled off-site and disposed at a permitted disposal facility. The excavated areas will be backfilled with clean material to restore existing grades (or similar). In-situ chemical oxidation and in-situ soil stabilization (ISCO/ISS) will be used

to treat areas at OU-1 where deep groundwater is impacted with MGP-related chemicals to oxidize and immobilize chemicals that are a potential source of impacts to groundwater and the Napa River.

- ISCO/ISS will be conducted by mixing soil amendments including cement, water, and sodium persulfate into the subsurface to depths up to 60 feet using large diameter rotary augers, jet grouting, or an excavator with mixing tool attachment, depending on the desired depth of treatment and other site conditions. Over the area where ISCO/ISS treatment is utilized, the upper 4 feet will be backfilled with clean fill material.
- The remainder of OU-1 will be capped with clean soil up to 4 feet thick or asphalt/concrete.
- The total amount of material that will be exported and imported is estimated to be approximately 42,000 cubic yards. It is estimated that approximately 2,500 truck trips will be required in and out of the work areas for the export of all wastes and import of backfill materials.
- Remedial activities for OU-1 are scheduled to be begin in Fall/Winter 2023 and are expected to take approximately twelve to sixteen months.
- Remedial activities for OU-2 are scheduled to be begin in Fall/Winter 2023 and are expected to take approximately four months.
- Following remediation, soil gas probes will be installed and sampled approximately six months after the completion of remedial activities. Additionally, a network of post-remediation groundwater monitoring wells will be installed and monitored for a minimum of five years.
- The selected remedial alternative will include institutional controls including LUCs restricting land uses preventing installation of groundwater wells, specifying cap-maintenance requirements, and restricting activities that could compromise the integrity of the cap.

Soil Management Plans will also be prepared for each OU would be required to manage potentially impacted soil in the event intrusive subsurface work is needed in the future (e.g., underground utilities, new construction, etc.).

Finding of Significant Effect on Environment: DTSC has determined that this project, as proposed, will not have a significant effect on the environment as that term is defined in Public Resources Code Section 21068. *(An Initial Study supporting this finding is attached.)*

Mitigation Measures: No mitigation measures have been identified.



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Branch Chief's Signature

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09/30/2022

Date

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