



October 2, 2023

State Water Resources Control Board
Underground Storage Tank Program, 15th Floor
P.O. Box 2231
Sacramento, CA 95814
Attention: Dayna Cordano

Sent via email:

USTClosuresComments@waterboard.ca.gov,
Dayna.Cordano@waterboards.ca.gov,
Laurent.Meillier@waterboards.ca.gov

RE: Case Number 21-0030 Chevron 5810 Nave Drive, Novato, Marin County

Dear Dayna Cordano and Laurent Meillier:

The North Marin Water District (NMWD) has received the Public Notice for the referenced Site, reviewed the Case Closure Summary and the Draft Order, and conducted limited review of the documents available in the GeoTracker data management system. Based on that review, NMWD is providing important background information and comments for consideration by the Water Board.

Background Information

1. NMWD provides potable and recycled water to the greater Novato area, including the location of the former Chevron facility (opened in 1963 and closed in 1983) and the surrounding development. A 12-inch diameter potable water main pipeline is located in Nave Drive and the adjoining Roblar Drive. In addition, several water services and appurtenances (e.g. fire hydrants) are connected to the water main as shown on the attached Exhibit A. Note that a 30-inch transmission main, owned and operated by Marin Municipal Water District (MMWD) is also located in this area as shown in the exhibit.
2. The existing 12-inch water main described above is asbestos cement pipe and was originally installed in 1962. As part of the NMWD Water Master Plan¹, as well as NMWD engineering procedures for the Capital Improvement Program (CIP), replacement of this pipeline will be performed sometime in the next 10 to 15 years due to overall age and material type. The pipeline was installed at a depth of approximately 5 feet (measured from the bottom of the pipe).
3. Since the 12-inch water main is located within public right of way, NMWD would apply for a project-specific encroachment permit from the City of Novato (City) prior to any excavation associated with a pipeline replacement or major repair. However, each year, NMWD secures an "annual utility encroachment permit" from the City for use in emergencies or minor maintenance work. Based on prior experience, asbestos cement pipe of the age of this pipeline is subject to unplanned breakage or leakage prior to full planned replacement.
4. NMWD is subject to numerous state and federal regulations, engineering and operational standards, and general and specific best practices regarding its potable water distribution system. These include Section 64572 of CCR Title 22 (California

¹ <https://nmwd.com/wp-content/uploads/2020/04/2018WMP.pdf>

“Waterworks Standards”) which requires not only specific pipeline materials, design, and construction standards, but most importantly, physical separation of water mains from certain hazards, such as a “...sanitary landfill, wastewater disposal pond, or hazardous waste disposal site...” as well as an “...underground hazardous material storage tank...” (see Section 64572(42), underlining for emphasis). In addition, NMWD’s engineering standards comply with or are based on various American Water Works Association (AWWA) standards and practices that assume that all water pipeline bedding or trench material are free of contamination.

Comments

NMWD’s concerns with the planned closure of the referenced Site has two basic elements: 1) the health and safety of our construction and maintenance crews (as well as contracted construction firms) working on the pipelines and appurtenances within or near the Site; and 2) impacts to the nearby water distribution system (see Exhibit A) and overall compliance with state requirements for separation and protection of the pipelines from various hazards. Due to documented past contamination events at sites similar to the referenced Site, it is assumed that there is a risk of contaminants in the groundwater and soils surrounding drinking water distribution and transmission mains entering those pipelines. As previous described above, this concern is generally reflected in state regulations which require minimum separation distances, specific pipe materials, design standards, and construction standards for drinking water mains in relation to sources of contaminants in their vicinities. Additional requirements exist for backflow protection due to the tendency of pipelines to draw in foreign fluids that results from changes in pressures which can create negative pressure (vacuum conditions).

Given the overall concerns described above and based on NMWD’s limited review of the prior soil and groundwater sampling and site characterization of the contamination at the referenced Site, the following specific comments are provided:

1. NMWD is concerned that under certain circumstances, the existing potable distribution system would be a possible sensitive receptor of any residual contamination. These conditions exist when there is a depressurization of the pipeline due to system pressure fluctuations or loss, a pipeline breakage, or other circumstances which are not necessarily unusual or extreme. As previously described, these conditions could create a negative pressure or vacuum conditions that could draw contamination into NMWD’s pipelines from surrounding groundwater.
2. NMWD feels that additional soil and groundwater characterization by the Responsible Party is needed within our pipeline alignment to gauge if additional protective provisions are needed in the Soil and Groundwater Management Plan ahead of a planned or, more importantly, an unplanned excavation for pipe maintenance or repair.
3. NMWD is concerned that the planned or unplanned future excavation of its water facilities in this area (within or near the Site) could directly encounter contamination (either soil or shallow groundwater). Please clarify that the Chevron Environmental Management Company (CEMC) or its successor or replacement entity must be available and responsible for profiling of the encountered soil or groundwater within the trench excavation.
4. Please clarify that CEMC (or its successor or replacement entity) will be responsible for the handling and disposal of any subsequently confirmed contaminated soil or groundwater encountered during NMWD’s excavation activities associated with water facilities repair or replacement activities within or near the Site, including the cost of such handling and disposal.

5. Soil and Groundwater Management Plan notifications: In addition to notifying the City of Novato, please also notify NMWD if CEMC is replaced by a successor or some other entity:

North Marin Water District
Attention: Engineering Department
P.O. Box 146
Novato, CA 94948

Thank you for consideration of these comments. At NMWD, the safety of our staff is paramount. Our overall mission is to provide high quality potable water to our customers at reasonable rates. Maintaining and upgrading the above and below ground water distribution system is a critical element of that mission, including assurances that our delivery systems are protected from negative environmental or anthropogenic impacts as well as compliance with all applicable state and federal regulations.

If you have any questions please contact me at 415-897-4133 or twilliams@nmwd.com.

Sincerely,



Pablo Ramudo
Water Quality Supervisor

Sincerely,

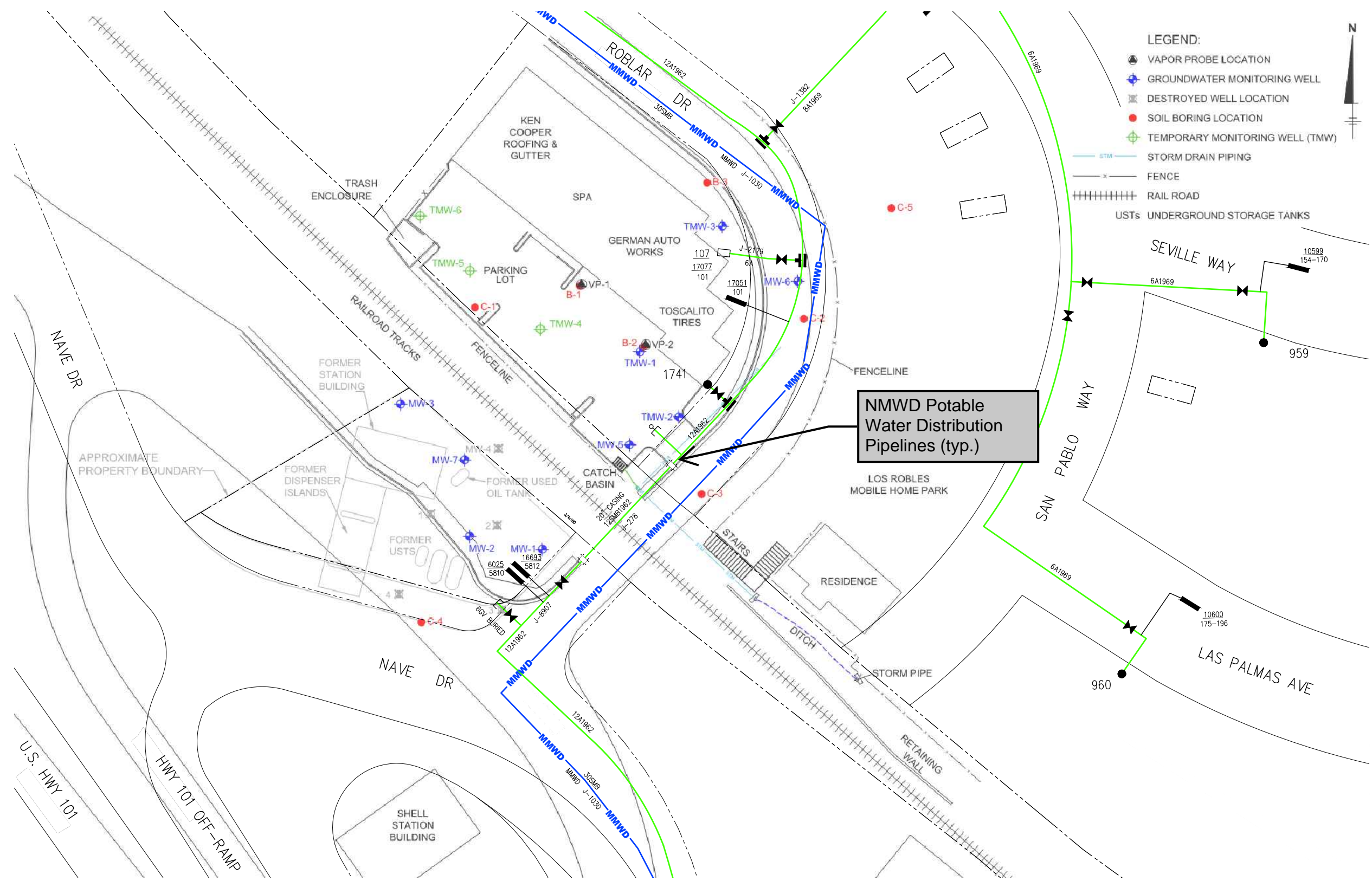


Anthony Williams, P.E., QSD
General Manager

Attachment: Exhibit A (Site Plan)

- c: Elena Joy Pelen, Marin District Division of Drinking Water
Craig Judson, Bold Polisner, Maddow, Nelson & Judson (NMWD Counsel)
Paul Sellier, Marin Municipal Water District
Chris DeGabriele, Interim Public Works Director, City of Novato
David Dammuller, Engineering Services Manager, City of Novato

Aug 14, 2023 - 2:36pm W:\JOB\FACILITY\Former Chevron Station_Site Map.dwg User: SDOVE



- LEGEND:**
- VAPOR PROBE LOCATION
 - GROUNDWATER MONITORING WELL
 - DESTROYED WELL LOCATION
 - SOIL BORING LOCATION
 - TEMPORARY MONITORING WELL (TMW)
 - STORM DRAIN PIPING
 - FENCE
 - RAIL ROAD
 - USTs: UNDERGROUND STORAGE TANKS



- LEGEND:** ("T" TANK, GRAVITY ZONES)
- ZONE 1
 - ZONE 2
 - ZONE 3
 - ZONE 4

- ("R" REGULATED ZONES)
- ZONE 1
 - ZONE 2
 - ZONE 3
 - ZONE 4

- ("H" HYDROPNEUMATIC ZONES)
- ZONE 1
 - ZONE 2
 - ZONE 3
 - ZONE 4

- RECYCLED WATER ABANDONED PIPE
- MMWD PIPELINE
- SCWA PIPELINE

NORTH MARIN WATER DISTRICT NOVATO, CALIFORNIA			
FORMER CHEVRON STATION SITE MAP			
DRAWN BY: SD	DATE: 8/14/23	DESIGNED BY: TW	DATE: 8/14/23
REVISED BY:	DATE:	DRAWING NO. FIGURE 1	