

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



7

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

August 3, 2005

Mark Johnson
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Fuel Leak Case No. RO0002590, Hexcel Corporation, 75 North Mines Road, Livermore, CA

Dear Mr. Johnson:

The Alameda County Environmental Health Local Oversight Program has an open case for a former tank near Building 77 at the Hexcel Facility, 75 North Mines Road, Livermore, CA. When the tank was removed in August, 2003, a one-inch hole was observed in the bottom of the tank. Overexcavation of soil was conducted within the tank pit to a depth of 3.5 feet but was halted to prevent damage to the building foundation. Oil, odor, and staining were observed in soils in the bottom of the overexcavation and under pipes that extend beneath the building foundation. Soil samples from the excavation detected TPH as diesel and oil and grease at elevated concentrations. In addition, the soil sample collected beneath pipes that extend under the building also contained 320 micrograms per kilogram of trichloroethene.

As we previously discussed, since the San Francisco Bay Regional Water Quality Control Board (Water Board) has been extensively involved in oversight of soil and water quality issues at the Hexcel facility and the Water Board will continue to have some oversight role for the facility, it would be more efficient to consolidate oversight for the former tank with other issues under one regulatory agency. Therefore, we are transferring oversight of the investigation and cleanup activities for the former tank near Building 77 from ACEH to the Water Board. I am enclosing all documents and correspondence from our files for this case.

ACEH previously requested that Hexcel Corporation prepare a Work Plan for investigation of the leaking UST in correspondence dated June 29, 2005. That request is rescinded based upon transfer of oversight of the case from ACEH to the Water Board. If you have any questions, please call me at (510) 567-6791.

Sincerely,

Jerry Wickham, P.G.
Hazardous Materials Specialist

Enclosures – RO0002590 File

Mark Johnson
August 3, 2005
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cc: Colleen Winery, QIC 80201 w/o enclosures
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Danielle Stefani w/o enclosures
Livermore-Pleasanton Fire Department
3560 Nevada Street
Pleasanton, CA 94566

Mary Harvey w/o enclosures
Hexcel Corporation
75 North Mines Road
Livermore, CA 94518

Jonathan Redding w/o enclosures
Wendel, Rosen, Black & Dean, LLP
1111 Broadway, Suite 2400
Oakland, CA 94607

Richard Weiss w/o enclosures
Weiss Associates
5801 Christie Avenue, Suite 600
Emeryville, CA 94608-1827

Donna Drogos, ACEH w/o enclosures
Jerry Wickham, ACEH w/o enclosures
File

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June 29, 2005

Mary Harvey
Hexcel Corporation
75 North Mines Road
Livermore, CA 94518

Subject: Fuel Leak Case No. RO0002590, Hexcel Corporation, 75 North Mines Road, Livermore, CA

Dear Ms. Harvey:

Alameda County Environmental Health (ACEH) staff has reviewed the case file and the report "Tank System Closure," dated October 28, 2003 prepared on behalf of Hexcel by Weiss Associates. The report summarizes the results from the tank and piping removal that occurred in August and September, 2003. A 1-inch diameter hole was observed in the bottom of the northwest end of the tank but no staining was observed in the excavation beneath the hole. During tank removal activities, six soil samples were collected from three locations and a soil stockpile. Soil samples collected in the piping area adjacent to the tank contained elevated concentrations of petroleum hydrocarbons. Total petroleum hydrocarbons as diesel were detected at concentrations up to 42,000 milligrams per kilogram (mg/kg) and oil and grease was detected at concentrations up to 63,000 mg/kg. In addition, trichloroethene was detected in one soil sample at a concentration of 320 micrograms per kilogram ($\mu\text{g}/\text{kg}$).

Livermore-Pleasanton Fire Department referred this case to ACEH on March 28, 2004. Based on the observations during the tank removal and the results of the soil sampling, an investigation is required to assess the extent of contamination beneath your site. We recommend that your investigation incorporate expedited site assessment techniques. Therefore, we recommend that you utilize direct push technology to collect soil samples and depth-discrete groundwater samples prior to the installation of groundwater monitoring wells. Sampling locations should be located to assess the extent of soil and groundwater contamination. Other options for additional investigation may be appropriate to define contamination at your site.

Please submit a work plan detailing your proposal to define the extent of soil and groundwater contamination by September 28, 2005. This report is being requested pursuant to the Regional Water Quality Control Board's (Regional Board) authority under Section 13267 of the California Water Code.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **September 30, 2005** – Work Plan for Soil and Groundwater Investigation

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

LANDOWNER NOTIFICATION REQUIREMENTS

Pursuant to California Health & Safety Code Section 25297.15, the active or primary responsible party for a fuel leak case must inform all current property owners of the site of cleanup actions or requests for closure. Furthermore, ACEH may not consider any cleanup proposals or requests for case closure without assurance that this notification requirement has been met. Additionally, the active or primary responsible party is required to forward to ACEH a complete mailing list of all record fee title holders to the site.

At this time, we require that you submit a complete mailing list of all record fee title owners of the site by **July 28, 2005**, which states, at a minimum, the following:

A. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

- OR -

B. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

In the future, for you to meet these requirements when submitting cleanup proposals or requests for case closure, ACEH requires that you:

1. Notify all current record owners of fee title to the site of any cleanup proposals or requests for case closure;
2. Submit a letter to ACEH which certifies that the notification requirement in 25297.15(a) of the Health and Safety Code has been met;
3. Forward to ACEH a copy of your complete mailing list of all record fee title holders to the site; and
4. Update your mailing list of all record fee title holders, and repeat the process outlined above prior to submittal of any additional *Corrective Action Plan* or your *Request for Case Closure*.

Your written certification to ACEH (Item 2 above) must state, at a minimum, the following:

A. In accordance with Section 25297.15(a) of the Health & Safety Code, I, (name of primary responsible party), certify that I have notified all responsible landowners of the enclosed proposed action. (Check space for applicable proposed action(s)):

- cleanup proposal (Corrective Action Plan)
- request for case closure
- local agency intention to make a determination that no further action is required
- local agency intention to issue a closure letter

- OR -

B. In accordance with section 25297.15(a) of Chapter 6.7 of the Health & Safety Code, I, (name of primary responsible party), certify that I am the sole landowner for the above site.

(Note: Complete item A if there are multiple site landowners. If you are the sole site landowner, skip item A and complete item B.)

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

Mary Harvey
June 29, 2005
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AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.
Hazardous Materials Specialist

cc: Colleen Winey, QIC 80201
Zone 7 Water Agency
100 North Canyons Parkway
Livermore, CA 94551

Donna Drogos, ACEH
Jerry Wickham, ACEH
File



Mary Harvey
Hexcel
75 North Mines Road
Livermore, CA

Alameda County March 28, 2004

MAR 31 2004

Environmental Health

Subject: Underground Storage Tank (UST) Removal at 75 North Mines Road

Dear Ms. Harvey,

On August 29, 2003, one, 1,000 gallon UST that last contained heating oil and other hydrocarbons, was removed from the above-mentioned site under the direction of Weiss Associates. Livermore-Pleasanton Fire Department (LPFD) received the Closure Report including analytical results for the soil samples taken during the removal process, and the disposal documents for the system components.

The sampling results submitted indicate a release of various hydrocarbon compounds primarily associated with heating oil from this UST system. These included, diesel, gasoline, kerosene, motor oil and extractable hydrocarbons in concentrations ranging from 140 to 340,000 mg/kg. Many of the related organics (benzene compounds, toluene, and xylenes) were also present. In addition, trichloroethene (not normally found in heating oil) was found in one sample (at 2 feet BGS), with a concentration of 320 ug/kg.

Contamination was observed, and found in samples collected at the surface, and down to 4 feet BGS. The samples collected directly below the tank (at 11 BGS), did not show contamination above the detection limits for the various constituents. The source(s) of concern appeared to be located in the piping areas adjacent to the tank up to the building foundation area.

Based upon the results of the soil sampling at this site, and the observations made during the tank removal process, additional work is, or may be needed with respect to this former underground tank system. This case has been referred to the Alameda County Health Care Services, Environmental Health Division for oversight. For additional information, please contact Ms. Donna Drogos, PE, at:

Alameda County Health Care Services
1131 Harbor Bay Parkway
Alameda, CA 94502
510-567-6700

If you have any questions concerning this letter, please feel free to contact me directly at 925-454-2337. Thank you for your cooperation in this matter.

Sincerely,

John Rigter
Hazardous Materials Inspector
Livermore-Pleasanton Fire Department

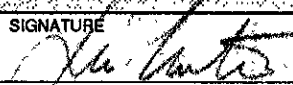
Cc: Joyce Adams, RG, Weiss Associates, 5801 Christie Street, Suite 600, Emeryville, CA 94608
Donna Drogos, PE, Alameda County Health Care Services, Environmental Health Division

3560 Nevada Street, Pleasanton, CA 94566

Administration & Suppression
(925) 454-2361
Fax 249-2397

Fire Prevention Bureau
(925) 454-2361
Fax 454-2367

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		FOR LOCAL AGENCY USE ONLY I HEREBY CERTIFY THAT I HAVE DISTRIBUTED THIS INFORMATION ACCORDING TO THE DISTRIBUTION SHOWN ON THE INSTRUCTION SHEET ON THE BACK PAGE OF THIS FORM.		
REPORT DATE 9 9 9 3 9 3		CASE # Alameda County SEP 15 2003		SIGNED: _____ DATE: _____		
REPORTED BY	NAME OF INDIVIDUAL FILING REPORT JIM MARTIN Environmental Health		PHONE (510) 450-6126		SIGNATURE 	
	REPRESENTING <input checked="" type="checkbox"/> OWNER/OPERATOR <input type="checkbox"/> REGIONAL BOARD <input type="checkbox"/> LOCAL AGENCY <input type="checkbox"/> OTHER		COMPANY OR AGENCY NAME WEISS ASSOCIATES			
	ADDRESS 5801 CHARSTIE AVE, # 600, EMERYVILLE, CA 94608					
RESPONSIBLE PARTY	NAME HEXCEL CORP <input type="checkbox"/> UNKNOWN		CONTACT PERSON MARY HARVEY		PHONE (925) 447-9667 1001 X 282	
	ADDRESS 75 N. MINES RD., LIVERMORE, CA 94550					
SITE LOCATION	FACILITY NAME (IF APPLICABLE) Same as RP		OPERATOR		PHONE ()	
	ADDRESS STREET CITY STATE ZIP					
	CROSS STREET					
IMPLEMENTING AGENCIES	LOCAL AGENCY LIVERMORE-PLEASANTON FIRE DEPT		CONTACT PERSON JOHN RIGTER		PHONE (925) 454 2337	
	REGIONAL BOARD SAN FRANCISCO STATE REGION		CONTACT PERSON BETTY GRAYSON		PHONE (510) 632-2350	
SUBSTANCES INVOLVED	(1) NAME HEATING OIL		QUANTITY LOST (GALLONS) <input checked="" type="checkbox"/> UNKNOWN			
	(2)		<input type="checkbox"/> UNKNOWN			
DISCOVERY/ABATEMENT	DATE DISCOVERED 9 9 3 9 0 9 3		HOW DISCOVERED <input type="checkbox"/> INVENTORY CONTROL <input type="checkbox"/> SUBSURFACE MONITORING <input type="checkbox"/> NUISANCE CONDITIONS <input type="checkbox"/> TANK TEST <input checked="" type="checkbox"/> TANK REMOVAL <input type="checkbox"/> OTHER			
	DATE DISCHARGE BEGAN M M D D Y Y <input checked="" type="checkbox"/> UNKNOWN		METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY) <input checked="" type="checkbox"/> REMOVE CONTENTS <input checked="" type="checkbox"/> CLOSE TANK & REMOVE <input type="checkbox"/> REPAIR PIPING <input type="checkbox"/> REPAIR TANK <input type="checkbox"/> CLOSE TANK & FILL IN PLACE <input type="checkbox"/> CHANGE PROCEDURE <input type="checkbox"/> REPLACE TANK <input type="checkbox"/> OTHER			
	HAS DISCHARGE BEEN STOPPED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DATE 9 8 3 9 0 9 3					
SOURCE/CAUSE	SOURCE OF DISCHARGE <input checked="" type="checkbox"/> TANK LEAK <input type="checkbox"/> UNKNOWN <input checked="" type="checkbox"/> PIPING LEAK <input type="checkbox"/> OTHER		CAUSE(S) <input type="checkbox"/> OVERFILL <input type="checkbox"/> RUPTURE/FAILURE <input type="checkbox"/> SPILL <input checked="" type="checkbox"/> CORROSION <input type="checkbox"/> UNKNOWN <input type="checkbox"/> OTHER			
	CHECK ONE ONLY <input checked="" type="checkbox"/> UNDETERMINED <input type="checkbox"/> SOIL ONLY <input type="checkbox"/> GROUNDWATER <input type="checkbox"/> DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)					
CURRENT STATUS	CHECK ONE ONLY <input type="checkbox"/> NO ACTION TAKEN <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT WORKPLAN SUBMITTED <input type="checkbox"/> POLLUTION CHARACTERIZATION <input checked="" type="checkbox"/> LEAK BEING CONFIRMED <input type="checkbox"/> PRELIMINARY SITE ASSESSMENT UNDERWAY <input type="checkbox"/> POST CLEANUP MONITORING IN PROGRESS <input type="checkbox"/> REMEDIATION PLAN <input type="checkbox"/> CASE CLOSED (CLEANUP COMPLETED OR UNNECESSARY) <input type="checkbox"/> CLEANUP UNDERWAY					
	CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS) <input type="checkbox"/> CAP SITE (CD) <input type="checkbox"/> EXCAVATE & DISPOSE (ED) <input type="checkbox"/> REMOVE FREE PRODUCT (FP) <input type="checkbox"/> ENHANCED BIO DEGRADATION (IT) <input type="checkbox"/> CONTAINMENT BARRIER (CB) <input type="checkbox"/> EXCAVATE & TREAT (ET) <input type="checkbox"/> PUMP & TREAT GROUNDWATER (GT) <input type="checkbox"/> REPLACE SUPPLY (RS) <input type="checkbox"/> VACUUM EXTRACT (VE) <input type="checkbox"/> NO ACTION REQUIRED (NA) <input type="checkbox"/> TREATMENT AT HOOKUP (HU) <input type="checkbox"/> VENT SOIL (VS) <input type="checkbox"/> OTHER (OT)					
COMMENTS	TANK EXCAVATION STILL OPEN					
	CITY ESTIMATED TO ALCO, LOP FOR FOLLOWUP ACTION					