CALIFORNIA WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER # 88-012
SITE CLEANUP REQUIREMENTS FOR:

H.B. Fuller Company
6925 Central Avenue
Newark, Alameda County

The California Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter called the Board) finds that:

1. The H.B. Fuller Company facility,at 6925 Central Avenue in Newark, California, is owned and operated by H.B. Fuller Company, 2400 Energy Park Drive, St. Paul, Minnesota. H.B. Fuller Company is hereinafter called the discharger.

2. H.B. Fuller Company produces industrial adhesives for uses in commercial packaging. The H.B. Fuller Company site is located in the southwestern portion of the city of Newark, about 2.5 miles from San Francisco Bay. The local topography is generally flat to gently sloping, and the site elevation is between 15 and 20 feet above sea level. The area north of the site is generally developed for low density residential, commercial and light industrial occupancy. The area to the south of the site is only partially developed,with the San Francisco Bay National Wildlife Refuge bordering the bay at this location.

3. The parcel of land at 6925 Central Avenue was vacant until 1959 when the Paisley Products Company began construction of their plant foundation. In April 1962, Paisley Products (which later became part of Nabisco Brands) began production at this site. H.B. Fuller Company moved on to the 6925 Central Avenue site in 1975.

4. In 1982, the discharger responded to the Board's Industrial Facility Questionnaire. Subsequent to review of this questionnaire, the RWQCB staff requested that the discharger investigate the possibility of soil and ground water pollution due to leakage and/or spillage of organic chemicals used and stored at the site. The discharger has reported the use of toluene, tetrachloroethene, trichloroethene, and 1,1,1-trichloroethane at the facility. The discharger also reported that benzene was part of the raw materials handled by Paisley Products during their operations on the site.

5. Wahler and Associates performed the preliminary investigatory work for the discharger and indicated in their May 1983 report that further investigation was warranted. Camp, Dresser and McKee, Inc. was subsequently employed and released the results of their investigation in a February, 1984 report. This report concluded that the distribution of the pollutant concentrations suggested that the pollution was the result of

isolated spills. Subsequent sampling results appear to confirm this. The discharger has released five additional reports since 1984.

6. Water quality monitoring has been performed approximately once a year since 1983. There are currently twelve monitoring wells monitored for this site.

7. Benzene, Chloroethane, 1,1-DCA, 1,1-DCE, Trans 1,2-DCE, Ethylbenzene, PCE, TCE, 1,1,1-TCA, Xylene and Chloroform have been reported in the shallow ground water at depths of 10 to 25 feet. The discharger reported that the detection of benzene in the shallow saturated zone is a result of isolated spills from the previous owner of the site, Paisley Products.

8. The analytical results for two off-site fringe wells have indicated that the ground water pollution has not migrated laterally off-site. The Alameda County Water District (ACWD) maintains two 2-inch diameter wells near the site for monitoring the hydraulic saltwater intrusion barrier project. These wells (E-65 and E-66) are screened in the Newark Aquifer, which underlies the site, at depths of about 70 to 90 feet. The analytical results for water quality samples from these wells indicate that no pollutants currently exist in the Newark Aquifer.

9. Ground water elevation data collected during ACWD salinity project pump tests in the vicinity of the H.B. Fuller site indicate that there is no significant hydraulic connection between the Newark Aquifer and the polluted shallow water bearing zones at the discharger's site.

10. Benzene concentrations of up to 32000 ug/l were found in monitoring well F-1. Air stripping treatment of ground water extracted from two 27" x 26' caissons installed on each side, slightly down gradient of well F-1, began on May 19, 1986. Benzene concentrations at the inlet of the treatment system have been reduced to about 4000 ug/l. Pretreatment and sediment removal is accomplished with three Culligan industrial water softener units. In accordance with Union Sanitary District permit # T86-002, the effluent from the treatment system is used for plant washdown water. The Bay Area Air Quality Management District (BAAQMD) approved the air stripping operation via permit # 31310. The Board finds that the current ground water extraction and cleanup system has been effective in reducing the levels of pollution in the ground water and that this ground water extraction program should continue.

11. The Board finds that the requirements of Subchapter 15 of the California Administrative Code (Title 23, Chapter 3) do not apply in this matter. The Board considers that the remedial work implemented by the discharger involving ground water extraction and treatment are consistent with the Provisions of Subchapter 15. As such, the Board finds that these remedial actions exempt the discharger from the requirements of Subchapter 15 in accordance with Section 2511(d) of that Subchapter.

12. The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on December 17, 1986, and the State Water Resources Control Board approved it on May 21, 1987. The Basin Plan contains water quality objectives for the Newark Aquifer and ground water underlying and adjacent to the facility.

13. The existing and potential beneficial uses of the Newark Aquifer and ground water underlying and adjacent to the facility are:

a. Municipal Supply
b. Industrial Process Water Supply
c. Industrial Service Supply
d. Agricultural Uses

14. Discharge Prohibitions, Specifications, and Provisions of this Order are based on the Basin Plan, State and Regional Board policies, and best engineering judgment.

15. The project involves ground water extraction, cleanup and monitoring at the site as required by the laws and regulations administered by the Regional Board. This action is categorically exempt from the provisions of the CEQA pursuant to Section 15321 of the Resources Agency Guidelines.

16. The Board has notified the discharger and 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 for a public hearing and an opportunity to submit their written views and recommendations.

17. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that H.B. Fuller Company, pursuant to Section 13304 of the California Water Code, shall cleanup and abate the effects described in the above findings at its Newark facility:

A. Prohibitions

1. The discharge of pollutants in any manner which will degrade the water quality or adversely affect the beneficial uses of the surface waters of the State is prohibited.

2. The migration of pollutants through subsurface transport to deeper water bearing zones is prohibited.

3. The lateral migration of pollutants through subsurface transport offsite is prohibited.

B. Specifications

1. Should monitoring results show evidence of pollution migration, additional characterization of the vertical and lateral extent of pollution may be required.

2. The cleanup or disposal of polluted ground water shall not create a nuisance as defined by Section 13050 (m) of the California Water Code.

C. Provisions

1. The discharger shall comply with all sections of this Order immediately upon adoption.

2. The discharger shall submit to the Board technical reports on self-monitoring work performed according to a program prescribed by or amended by the Board's Executive Officer.

3. On an annual basis, commencing January 15, 1989, the discharger shall file a technical report with the Board which discusses the results of the past year's efforts towards cleanup of the polluted ground water and the projections for next year's cleanup efforts. This report shall include, but need not be limited to, updated water table and piezometric surface contour maps, pollution concentration contour maps for all affected water bearing zones, cross-sectional geological maps describing the hydrogeological setting of the site, and appropriately scaled and detailed base maps showing the location of all monitoring wells, extraction wells and adjacent facilities and structures.

4. All hydrogeological plans, specifications, reports, and documents shall be signed by or stamped with the seal of a registered geologist, engineering geologist or professional engineer.

5. 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 records for Board review.

6. The discharger 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.

7. The discharger shall permit the Board or its authorized representative, in accordance with Section 13267(c) of the California Water Code:

a. Entry upon premises in which any pollution sources exist, 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 terms and conditions of this Order.
c. Inspection of any monitoring equipment or methodology implemented 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 discharger.

8. The discharger shall file a report on any changes in site occupancy, use or ownership associated with the facility described in this Order.

9. The discharger shall file a report on any changes in deed restrictions and/or uses of the site as described in this Order.

10. If any hazardous substance is discharged in or on any waters of the state, or discharged and deposited where it is, or probably will be discharged in or on any waters of the state, the discharger shall report such discharge to this Regional Board, at (415) 464-1255 on weekdays during office hours from 8 a.m. to 5 p.m., and to the Office of Emergency Services at (800) 852-7550

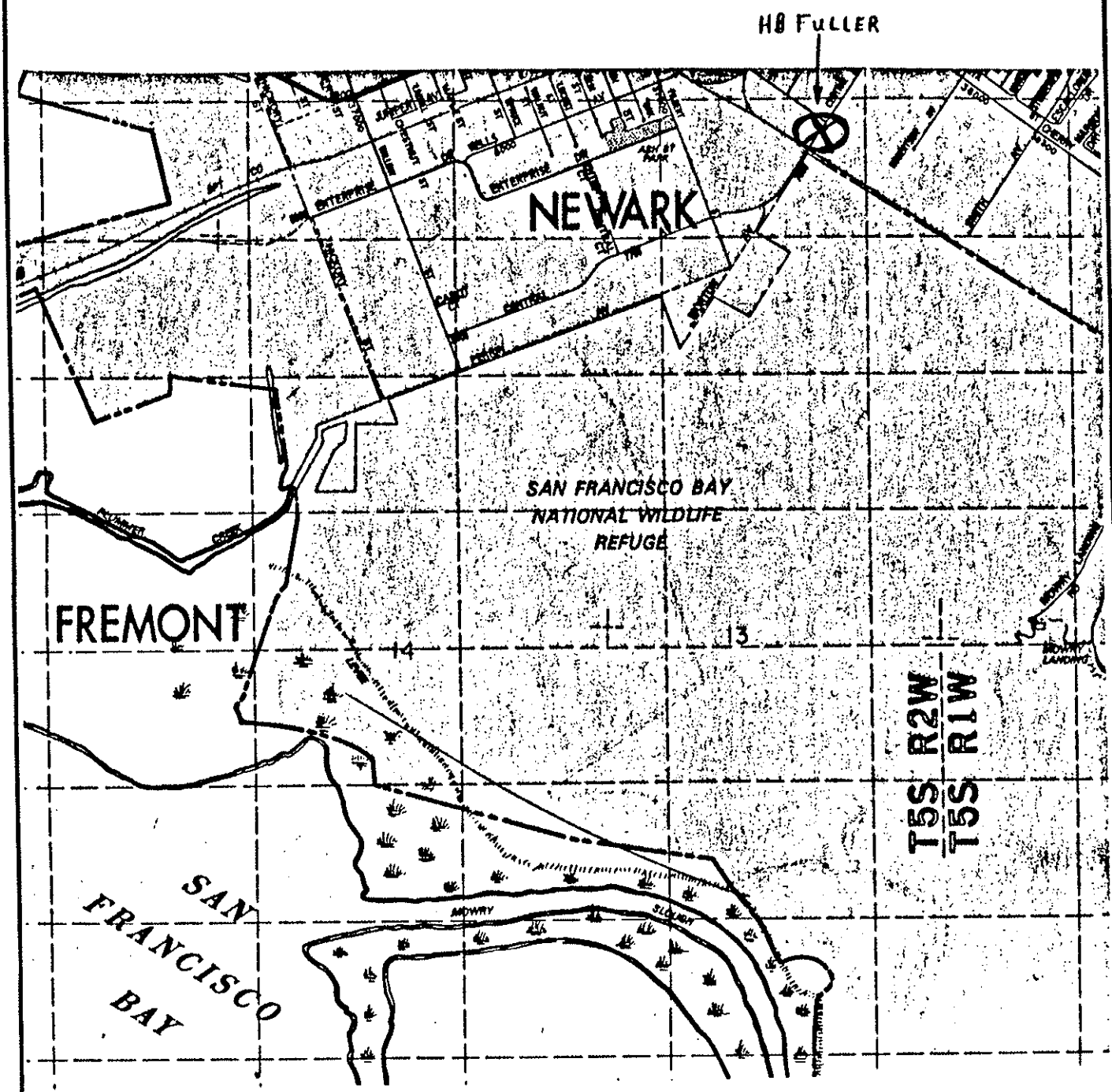
during non-business hours. A written report shall be filed with the Regional Board within five (5) working days and shall contain information relative to: the nature of waste or pollutant, quantity involved, duration of incident, cause of spill, Spill Prevention, Control, and Countermeasure Plan (SPCC) in effect, if any, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and persons/agencies notified.

11. The Board will review this Order periodically and may revise the requirements as necessary.

I, Roger B. James, 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 January 20, 1988.

Lawrence P. Kolb
for
Roger B. James
Executive Officer

APPENDIX D. LOCATION MAP



STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

H.B. FULLER COMPANY
6925 Central Avenue
Newark, CA

DRAWN BY:	DATE: 12/23/8	DRWG. NO. 001