Killam
Associates □ Consulting Engineers

27 Bleeker Street
Millburn, NJ 07041-1008
Telephone: 201-379-3400
Fax: 201-912-2400
Telex: 64-2057

May 15, 1993

Mr. Joe Novak
Case Manager
Industrial Site Evaluation Element
New Jersey Department of Environmental
Protection and Energy
CN 028
401 East State Street, Floor 5
Trenton, New Jersey 08625-0028

RE: April 1993 Monthly Progress Report on Remedial Activities at the Former Hexcel Site
205 Main Street, Lodi Borough
Bergen County, New Jersey
ECRA Case No. 86009

Dear Mr. Novak:

On behalf of Hexcel Corporation, Killam Associates (Killam), has prepared this summary report of remedial activities performed at the above referenced site during the period of April 16, 1993 to May 15, 1993. This report satisfies the requirements of Paragraph 36 of the New Jersey Department of Environmental Protection and Energy (NJDEPE) conditional approval letter of July 31, 1990.

A. GROUNDWATER

Collection of Basement Seepage Water

The air stripping towers and incinerator were operated during the month of April 1993 in order to treat approximately 4,050 gallons of basement seepage water collected during the month of March 1993.

Upper Overburden Aquifer

No additional work was performed relating to the upper overburden aquifer during the month of April.

Lower Overburden Aquifer

No additional work was performed relating to the lower overburden aquifer during the month of April.

B. SOILS

No additional work was performed relating to soils during the month of April.

SDMS Document
88381

C. GROUNDWATER TREATMENT SYSTEM OPERATION

The 4,050 gallons of basement seepage water collected in the month of March and treated during April 1993, has not been discharged to the Passaic Valley Sewerage Commissioners (PVSC) as the PVSC Permit for Hexcel under Fine Organics (Permit #17405042) expired on November 30, 1992. Killam has applied for an extension to this permit with the PVSC.

Although Hexcel did not discharge during the month of April, it is still necessary to file the appropriate PVSC MR-2 form and the NJPDES SIU Permit Discharge Monitoring Report (DMR). Copies of these forms are included in Appendix A of this report.

As stated in last month's progress report, a temporary 6,500 gallon storage tank with a 7,500 gallon containment berm was installed at the Hexcel site. Approximately 4,000 gallons of water were pumped into this tank for storage. On April 20, 1993, the 4,000 gallons in the temporary tank, plus the 4,050 gallons treated during the month of April, were transported to E. I. Dupont de Nemours, Inc. of Deepwater, New Jersey for final disposal. The manifests from this activity are included in Appendix B of this report.

D. DENSE NON-AQUEOUS PHASE LIQUID (DNAPL)

No additional work was performed relating to the DNAPL monitoring plan during the month of April. According to the Groundwater/DNAPL/LNAPL Monitoring Plan of October, 1992, DNAPL measurements will be collected for the first three months after start-up of the groundwater recovery system occurs.

E. LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL)

No additional work was performed relating to the LNAPL monitoring plan during the month of April. Hexcel is currently planning to obtain LNAPL/Groundwater measurements for the month of May before the end of this month.

F. STATUS OF PERMITS

Air Control Apparatus
No activity occurred during this time period.

PVSC Sewer Connection Permit
Hexcel submitted a conceptual design draft to the PVSC for the installation of a separate sewer connection line on March 23, 1993. The PVSC issued a verbal approval with comments on April 6, 1993. Hexcel has prepared a finalized version of this permit application and expects to submit it by the end of May.

NJPDES Discharge to Groundwater Permit
No additional work was performed relevant to the NJPDES DGW Permit during the month of April.

NJPDES Discharge to Surface Water Permit
No additional work was performed relevant to the NJPDES DSW Permit during the month of April.

TWA Sewer Connection Permit
Hexcel is currently finalizing the TWA Sewer Connection Permit application. A letter was sent to the Borough of Lodi requesting access to Main Street for the installation of the sewerline on March 26, 1993. Approval for access to the street was granted. On May 3, 1993, Hexcel sent the finalized CP-1 form to the Borough of Lodi. Hexcel is currently awaiting approval from the Borough of Lodi.

Stream Encroachment Permit
A Stream Encroachment Permit is required to install the sewerline connection since the Hexcel facility is located in a flood plain. This permit application is finalized and is expected to be submitted at the end of this month.

NJPDES SIU Permit
In a letter dated April 30, 1993 from the NJDEPE, Wastewater Facilities Regulation Program to the Hexcel Corporation, NJPDES/SIU Permit No. NJ0081507 has been terminated effective June 1, 1993 in accordance with the "Regulations Concerning the New Jersey Pollutant Discharge Elimination System" (N.J.A.C. 7:14A), which were promulgated pursuant to the authority of the New Jersey "Water Pollution Control Act" (N.J.S.A. 58:10a-1 et. seq.). A copy of this letter can be found in Appendix C of this report.

G. RESPONSE TO MAY 4, 1993 LETTER FROM THE NJDEPE

Killam, on behalf of Hexcel, offers the following response to the NJDEPE letter dated May 4, 1993. For clarity of discussion, the item numbers in the NJDEPE letter are referenced below.

I. JANUARY 26, 1993 SUMMARY OF SOILS INVESTIGATION AND CONCEPTUAL CLEANUP PLAN PROPOSAL

The Department has expressed concern over the length of time proposed for the submittal of a final soil remediation plan. A revised time schedule, containing a detailed breakdown of tasks, has been requested by the Department and will be provided in the report due on or before June 15, 1993.

Hexcel would like to take this opportunity to highlight a number of issues related to soil cleanup at this site. As the NJDEPE is aware, the most significant issues

associated with this case are related to groundwater, most notably the presence of Dense Non-Aqueous Phase Liquids (DNAPLs) and Light Non-Aqueous Phase Liquids (LNAPLs). The LNAPL and DNAPL product is present in the saturated soils, and has been noted to accumulate in selected monitoring wells. Efforts to recover these free phase liquids from the subsurface are underway and will continue in the future. Hexcel considers this effort, along with the hydraulic control of contaminated groundwater in the shallow aquifer, to be uppermost on its agenda of remedial objectives and priorities. We believe these priorities to be in line with the Department's concerns. As the Department is aware, Hexcel has expended, and continues to expend, considerable time, effort and financial resources in achieving these objectives. In contrast, the soil quality at the site does not present an immediate concern. In the areas where soils exceeding cleanup standards have been identified, asphalt pavement exists. As such, there is no direct contact, dermal, ingestion, or inhalation exposure risk associated with these soils. The soils which exhibit contaminant concentrations above cleanup standards are contaminated with volatile organics, and the standards exceeded in these soils are subsurface standards, which are based on the protection of potable groundwater resources. Not withstanding the fact that the affected aquifer is not a potable water use aquifer (an issue previously brought to the Department's attention), the threat to groundwater quality from unsaturated vadose zone soils is inconsequential given the presence of LNAPL and DNAPL product in the saturated zone. Furthermore, the contaminated soils are covered by asphalt, therefore the amount of infiltrating water which mobilizes contaminants into groundwater is negligible. Given these considerations, we feel that a rational and balanced approach to site remediation undoubtedly places groundwater and free product issues at the head. While Hexcel is aware that the eventual remediation of these soils is desired by the Department, the commitment of financial resources has to be, by necessity, prioritized on the basis of human health and environmental risk. It is Hexcel's position that the contaminated soil presents a low human health and environmental risk, and that the schedule presented for the soils component of the cleanup plan is adequately responsive.

In response to the Department's comments regarding the remedial alternatives presented in the January, 1993 report, Hexcel offers the following observations. The Department's concerns regarding the implementability of the excavation and thermal desorption alternative are well taken. The Department states that the advantage offered by this alternative in terms of expediting cleanup time should be weighed against disruption of facility operations, delays associated with additional permitting, etc. These issues are the very factors that would inform the selection of the preferred cleanup alternative. To further add to this discussion, the limiting factors mentioned above would be considered in conjunction with the feasibility of other alternatives. In-situ soil vapor extraction (SVE), which was identified as the other potentially feasible technology, also has a number of limitations. As the Department is aware, the cleanup levels achieved by this technology are much less controllable than those achieved by thermal treatment.

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Hexcel is encouraged by the Department's recognition of the limitations of excavation/thermal treatment, and hopes that it will take into consideration the practical limits of the other feasible alternative, SVE technology, in approving site-specific cleanup levels to be achieved at this site.

Hexcel's plan for investigating the feasibility of SVE was detailed in the January, 1993 report. As the Department correctly observes, the application of Air Sparging technology (which is actively being considered to address dissolved groundwater contamination) requires that SVE be simultaneously applied, to withdraw the sparged contaminants from the subsurface in a controlled fashion. In Section 4.3.3 of the January, 1993 report, a description of the typical Air Sparging system was provided, which identified SVE as a necessary component of this technology. The Department has apparently misunderstood Hexcel's point with regard to applying SVE to soil contaminants only after groundwater Air Sparging is complete. As a clarification, an Air Sparging system would almost certainly include SVE, and both systems would be installed and operated at the same time. During this phase of the project, however, a significant reduction in soil contamination levels cannot be expected, because contaminants will continually be introduced to the vadose soil zone by the Air Sparging system. Only after the mass transfer from the saturated zone into unsaturated soils becomes negligible, can the SVE be expected to start extracting contaminants sorbed onto vadose zone soil particles and dissolved in soil pore water. Thus, the SVE soil cleanup phase (targeted to the reduction of contaminant levels in vadose zone soils), must follow the completion of groundwater Air Sparging/SVE.

As mentioned in the January 1993 report, the feasibility of applying Air Sparging/SVE will be investigated during a 12-month pilot test. Because groundwater pumping will draw the water table down to an extent and expose additional vadose zone soils to the effects of soil vapor extraction, initiation of this pilot test is most appropriate when hydraulic control of the shallow groundwater is achieved. The 12-month duration of the pilot test is considered necessary to ascertain the end point of effective soil and groundwater treatment. In this respect, the pilot test represents an application of the technology carried from start to finish, but on a much smaller physical scale than the actual system that would be required to address the entire affected area. Clearly, if the results of the pilot test are encouraging and a full scale Air Sparging/SVE system is proposed for groundwater, this will almost certainly control the selection of the preferred soil cleanup alternative. We must again reiterate, however, that the contaminant reduction achieved by SVE in soils may not meet the current NJDEPE cleanup standards in every location. We suggest that the Department review soil quality data obtained at the end of the SVE soil cleanup phase in conjunction with the achieved reduction in contaminant levels and reconsider the target soil cleanup levels at that time.

In regards to soil sampling location G-3, the proposed soil gas survey will include this location.

A. AOC 9,10, and 11

No comment necessary.

B. AOC 5

The Department's comments regarding boring 508 are evidently based on a misunderstanding with respect to the area of concern that this boring was intended to address. The misunderstanding appears to stem from the December 23, 1991 letter (Please refer to Appendix D for a copy of this letter.) from the Department in which the following comments were made (Item B.1.b.iii):

> "Area-5: The proposal to install a boring approximately 15 ft. north of the industrial sewer is unacceptable. Hexcel shall install a boring immediately adjacent to the industrial sewer in the location depicted on the attached site map...."

These comments were made in response to a letter dated August 9, 1991 from Hexcel (Please refer to Appendix E for a copy of this letter.) which described additional sampling activities. Please note that Hexcel did not propose any additional borings for Area-5. Furthermore, there are no industrial sewers in and around Area 5. We conjecture that the NJDEPE was actually referring to Area 6 and boring 613 (see figure attached to the Aug. 9 letter) in making these comments. Boring 613 was eventually installed by Heritage Remediation and Engineering (in response to the Department's comments in Item B.1.b.iv) in Area 6. There is no mention of boring 508 in the August 9, 1991 letter. Boring 508 was installed by Heritage at a later date in Area 5, probably in compliance with a verbal request from the Department during the March 17, 1992 meeting.

In regards to the PHC result for sample 508-004A, this result was submitted in the May 1992 Monthly Progress Report (Attachment A, Vol. 2, pg. 5). In regards to VO+15 analysis for samples taken at boring 508, contrary to the Department's understanding, Heritage did not report that this analysis was performed (please refer to the Chain of Custody sheets and Table 4 in the May 1992 Monthly Project Status report).

Boring 508 in Area 5 did not reveal contamination above cleanup standards. Area of Concern 6, Area of Concern 7, and portions of Area of Concern 13 have been combined into remedial Area 3 (Figure 14 of the February 1993 report). An adequate number of samples have been obtained to provide the estimated limits of this affected area. Additional refined delineation has been proposed in the form of a soil gas survey. Post-remediation confirmatory soil samples will be collected after the soil cleanup phase is completed. Hexcel does not consider any additional delineation sampling to be warranted at this time and does not propose same.

C. AOC 7: Gasoline Underground Storage Tank Northeast of Bldg. 6

The information requested by the Department has already been submitted by Heritage in the December 1991 Monthly Project Status Report.

D. AOC 13

As mentioned before, Area of Concern 6, Area of Concern 7, and portions of Area of Concern 13 have been combined into Remedial Area 3 (Figure 14 of the February 1993 report). An adequate number of samples have been obtained to provide the estimated limits of this affected area. Additional refined delineation has been proposed in the form of a soil gas survey. The soil gas survey results will also be utilized to assess potential migration of free product along the sewer lines. Post-remediation confirmatory soil samples will be collected after the soil cleanup phase is completed. Hexcel does not consider that boring 1304 is warranted at this time and does not propose same.

E. Storm Sewer Outfall

The sampling will be completed and the results will be reported in the July 1993 progress report.

II. MARCH 1, 1993 CORRESPONDENCE

A. In regard to the installation of a bedrock monitoring well at the location of MW-1, Killam, on behalf of Hexcel, has previously communicated to the Department our most serious reservations regarding the potential of a deep well in this location to provide a vertical pathway for contamination to move into the deeper stratum. We take this opportunity to repeat our reservations once again for the record regarding the installation of a bedrock well in this location. In light of the serious concerns to all parties concerned in this matter, we request a meeting with the Department to discuss this issue. Killam will be available to meet with the Department at your earliest convenience. Please also refer to our comment in Section II. E.

B. No comment necessary.

C. The seven wells that are equipped with pumps are CW-3, CW-5, CW-9, CW-11, CW-15, CW-19 and CW-21, as shown on drawings provided by both Heritage and Killam. Hexcel and Killam are not aware of any previous plans to install a pump in CW-18.

D. Continuous operation of the DNAPL recovery system is not planned at this time because the amount of DNAPL in the discharge diminishes to zero within a few hours of continuous pumping. It is expected that frequent but discontinuous pumping of the DNAPL wells will yield the best results.

E. Please note that the design capacity of the treatment system is 15 gpm not 15 gpd as stated in the Department's letter. Hexcel is cognizant of the NJDEPE's concern regarding the issue of recovery rates. As mentioned in previous communications, the hydraulic performance of the recovery system will be evaluated and the issue of permit discharge volume limits will be dealt with, if necessary, at the appropriate time.

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On the same subject, the NJDEPE remarks "Also, recovery from the lower overburden and recovery from bedrock would constitute additional withdrawals." We must take this opportunity to repeat Hexcel's reservations regarding pumping of these two units. Hexcel has not proposed pumping of these two deeper hydraulic units. The primary consideration in not making this recommendation is the fact that reducing pressure in these two relatively cleaner hydraulic units is likely to induce vertical downward flow of contaminated groundwater through the aquitard, from the contaminated upper overburden aquifer to the lower overburden and bedrock units. In this situation, groundwater pumping may not be an appropriate response, and in fact may seriously aggravate the situation. These issues will be discussed further when the hydraulic performance of the recovery system is evaluated. It is important, however, for the Department to take note of this issue at this time.

III. GENERAL COMMENTS

A. Please refer to Section II., A. for this discussion.

B. No comment necessary.

C. No comment necessary.

In closing, Killam requests that a meeting be scheduled between the Department and Killam personnel. Please contact Killam at your earliest convenience with a date and time for the meeting. If you have any questions or comments regarding this report, please do not hesitate to contact me at (201) 912-2489.

Very truly yours,

KILLAM ASSOCIATES

Gary K. Walker

Gary K. Walker
Senior Project Scientist

cc: A. William Nosil, Hexcel Corporation
James Higdon, Fine Organics
Lisa Bromberg, Esq.
Essam Saleh, Hexcel Corporation

APPENDIX A

MR-2 and DMR for April, 1993

NAME HEXCEL CORPORATION CONTRIBUTION TO FINE ORGANICS DISCHARGE

ADDRESS 205 MAIN STREET

FACILITY LOCATION LODI, NJ 07644

OUTLET DESIGNATION (17 DIGITS) 17405041-37430-0171 OUTLET #INDUSTRIAL S.

MONITORING PERIOD					
04	01	93	04	30	93
MO.	DAY	YR	MO.	DAY	YR
START			END		

VOL DISCHARGED THIS PERIOD
NONE GALS
CU. FT. X 7.48 = GALLONS
4050
EFFLUENT METER READING LAST DAY THIS PERIOD

DATE	BOD 0310	TSS 0530						
	NODI							
	NO DISCHARGE DURING THIS PERIOD							

SIGNATURE OF PRINCIPAL OR AUTHORIZED AGENT	TYPE NAME AND TITLE	TELEPHONE NO.
	DAVID H. KNOWLES	201-912-2584
		DATE 5/17/93

PVSC FORM MR-2 REV.2. 1/86

883810010

Day of Month," "	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Licensed Operator																															
Permit Noncompliance																															
Day of Month," "	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Licensed Operator																															
Permit Noncompliance																															
Day of Month," "	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Licensed Operator																															
Permit Noncompliance																															

FOR SIU ONLY (Attach necessary explanations):

I. Notification of Changed Discharge (Since your last Monitoring Report):

(a) Has any process, operation or method of wastewater at your facility changed? If yes, provide an explanation. ___ Yes ✓ No

(b) Has there been a substantial change in the volume or character of pollutants in your discharge, including the listed or characteristic hazardous wastes for which initial notification has been submitted under 40 CFR 403.12(p)? If yes, provide an explanation. ___ Yes ✓ No

II. One Time Notification:

(a) Has your facility discharged a substance into the POTW not already reported under the self monitoring requirements of 40 CFR 403.12(b), (d), and (e) which if otherwise disposed of would be a hazardous waste under 40 CFR Part 261? ___ Yes ___ No

(b) Has your facility discharged more than 15 kg of non-acute hazardous wastes and/or any acute hazardous wastes as specified in 40 CFR 261.30(d) and 40 CFR 261.33(e) into the POTW during any calendar month in the reporting period? ___ Yes ___ No

(c) Has your facility not previously submitted notification in accordance with 40 CFR 403.12(p)? ___ Yes ___ No

Submit the following information if you have answered "yes" to (a), (b), and (c) of this Section:

Name of hazardous waste_____ EPA hazardous waste no._____

Type of discharge (batch, continuous, or other)_____

(d) Has your facility discharged more than 100 kg of hazardous waste to the POTW during any calendar month in the reporting period? If yes, attach the following information to the extent such information is known and readily available to you: ___ Yes ___ No

(1) Identity of hazardous constituents contained in wastes _____

(2) Estimate of mass and concentration of such constituents in the wastestream discharging during the applicable month. _____ kg _____ m

(3) Estimate of mass of constituents in the wastestream expected to be discharged during the following 12 months. _____ kg

(e) If your answer to any of the items noted in Section II. is "yes", then attach a copy of the program required under 40 CFR 403.12(p)(4) in place to reduce the volume and toxicity of hazardous wastes generated to the degree which you have determined to be economically practical.

Noted program is: ___ Attached ___ Not Attached ___ Not Applicable

CERTIFICATION (ALL PERMITTEES):

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

WASTEWATER TREATMENT SYSTEM LICENSED OPERATOR (If Applicable)

Name (Print) DAVID H. KNOWLES

Class & Registry No. N-4 N0027

Signature _____ Date 4/7/93

as defined in 40 CFR 403.12(e)

PRINCIPAL EXECUTIVE OFFICER or DULY AUTHORIZED REPRESENTATIVE *

Name (Print) JOHN F. O'FLAHERTY

Title (Print) VICE PRESIDENT

Signature _____ Date _____

883810011

EE NAME/ADDRESS (Include ne/Location if different)
HEXCEL CORPORATION
11711 DUBLIN ROAD
DUBLIN, CA 94566

Y FINE ORGANICS CORPORATION
N LODI, NJ 07644
UMBER: 93021704

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

(2-16) NJ0081507 — PERMIT NUMBER
(17-19) 001 — DISCHARGE NUMBER

Form Approved.
OMB No. 2040-0004.
Approval expires 6-30-91.

883810012

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	93	04	01	TO	93	04	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

MINOR
METRO REGION

BERGEN

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
ER, TOTAL (AS CU)	SAMPLE MEASUREMENT								0		
2 1 0 UENT GROSS VALUE	PERMIT REQUIREMENT					360.00000 MNTH AVG	1100.0000 DLY MAX	UG/L		ONCE/ MONTH	COMP24
, TOTAL (AS PB)	SAMPLE MEASUREMENT								0		
1 1 0 UENT GROSS VALUE	PERMIT REQUIREMENT					48.00000 MNTH AVG	110.00000 DLY MAX	UG/L		ONCE/ MONTH	COMP24
EL, TOTAL (AS NI)	SAMPLE MEASUREMENT								0		
7 1 0 UENT GROSS VALUE	PERMIT REQUIREMENT					170.00000 MNTH AVG	360.00000 DLY MAX	UG/L		ONCE/ MONTH	COMP24
, TOTAL (AS ZN)	SAMPLE MEASUREMENT								0		
2 1 0 UENT GROSS VALUE	PERMIT REQUIREMENT					660.00000 MNTH AVG	2200.0000 DLY MAX	UG/L		ONCE/ MONTH	COMP24
1016 (CHLOR 1016)	SAMPLE MEASUREMENT								0		
1 1 0 UENT GROSS VALUE	PERMIT REQUIREMENT					REPORT MNTH AVG	1.00000 DLY MAX	UG/L		ONCE/ MONTH	GRAB
CS, TOTAL (TTO)	SAMPLE MEASUREMENT								0		
1 1 0 UENT GROSS VALUE	PERMIT REQUIREMENT					REPORT MNTH AVG	2.13000 DLY MAX	MG/L		ONCE/ MONTH	COMP24
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

TITLE PRINCIPAL EXECUTIVE OFFICER
HN F. O'FLAHERTY
CE PRESIDENT
TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: AREA CODE 510 — NUMBER 847-9500

DATE: YEAR 93 — MO 5 — DAY

IT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

NODI

N/A

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RMITTEE NAME/ADDRESS (Include
ility Name/Location if different)
ME HEXCEL CORPORATION
DRESS 11711 DUBLIN ROAD
DUBLIN, CA 94566

CILITY FINE ORGANICS CORPORATION
CATION LODI, NJ 07644
MR NUMBER: 93021704

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
NJ0081507	001L

Form Approved.
OMB No. 2040-0004.
Approval expires 6-30-91.

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MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	93	04	01	TO	93	04	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

MINOR
METRO REGION

BERGEN

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
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1032 1 0 EFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	**** ****	******	60.00000 MNTH AVG	110.00000 DLY MAX	UG/L		ONCE/ MONTH	GRAB
HROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******		******				0		
1034 1 0 EFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	**** ****	******	120.00000 MNTH AVG	230.00000 DLY MAX	UG/L		ONCE/ MONTH	COMP2

ME/TITLE PRINCIPAL EXECUTIVE OFFICER
JOHN F. O'FLAHERTY
VICE PRESIDENT
TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE AREA CODE	NUMBER	DATE YEAR	MO	DAY
510	847-9500	93	5	

MENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

NODI

THIS FORM TO AND WHICH MAY NOT BE USED.

PAGE _ OF _

MONITORING REPORT - TRANSMITTAL SHEET

Total pages in this submittal including cover form: 4

NJPDES NO. 0,0,8,1,5,0,7

REPORTING PERIOD MO. 04 YR 93 THRU MO. 04 YR 93

PERMITTEE: Name Hexcel Corporation

Address P.O. Box 8181, 5794 West Las Positas Blvd.
Pleasanton, California 94588-8781

Owner _____

FACILITY: Name Fine Organics Corporation

Address 205 Main Street

Lodi, NJ 07644 (County) Bergen

Telephone (201) 472-6800 Contact Person Essam A. Saleh

FORMS ATTACHED (*Indicate Quantity of Each*)

SLUDGE REPORTS - Sanitary

[ ] T-VWX-007 [ ] T-VWX-008 [ ] T-VWX-009

SLUDGE REPORTS - Industrial

[ ] T-VWX-010A [ ] T-VWX-010B

WASTEWATER REPORTS

[ ] T-VWX-011 [ ] T-VWX-012 [ ] T-VWX-013

GROUNDWATER REPORTS

[ ] T-VWX-015 [ ] T-VWX-015B [ ] T-VWX-017

[ ] T-VWX-015A [ ] T-VWX-016 [ ] T-VWX-018

NPDES DISCHARGE MONITORING REPORT

[1] EPA FORM 3320-1 [ ] OTHER

	YES	NO
PERMIT NONCOMPLIANCE	[ ]	[X]
OPERATING EXCEPTIONS		
DYE TESTING	[ ]	[ ]
TEMPORARY BYPASSING	[ ]	[ ]
DISINFECTION INTERRUPTION	[ ]	[ ]
MONITORING MALFUNCTIONS	[ ]	[ ]
UNITS OUT OF OPERATION	[ ]	[ ]
OTHER	[X]	[ ] NODI

(Detail any "YES" in appropriate space, attach sheets if needed.)

NOTE: The "Hours Attended at Plant/ Permit Noncompliance on the reverse of this sheet must also be completed for the applicable month and day.

LABORATORY CERTIFICATION:

Name of NJDEP certified laboratory performing analysis: N/A NODI

Certified laboratory identification number: _____

OPERATING EXCEPTIONS/PERMIT NONCOMPLIANCE DETAILED/COMMENTS

If you checked "yes" for permit noncompliance, explain the reason(s) for being out of compliance and what measures are being taken to achieve compliance. Provide a schedule for any corrective action.

NODI

(over)

883810014

APPENDIX B

Hazardous Waste Manifests for Treated Basement Seepage Water

April 20, 1993

State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 028, Trenton, NJ 08625-0028

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD198165841 Manifest Document No. 134 00006

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Excel Corporation, 205 Main Street, Lodi, New Jersey 07644

4. Generator's Phone (201) 473-6800

A. State Manifest Document Number: **NJA 1666221**

B. State Generator's ID: Same

5. Transporter 1 Company Name: Direct Environmental Inc

6. US EPA ID Number: NJD981218151

C. State Trans. ID: NJDEP 105175

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (201) 677-1800

E. State Trans. ID

9. Designated Facility Name and Site Address: E.I. Dupont de Nemours + Co Inc, Chambers Work - Route 130, Deepwater, New Jersey 08023

10. US EPA ID Number: NJD002185730

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (609) 540-2534

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Chemical Process Liquid NON RCRA/ NON DOT Regulated Material		XX	TT	4000	G	X910
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above: Water 100% L

K. Handling Codes for Wastes Listed Above: a. c. b. d.

15. Special Handling Instructions and Additional Information: NJDEP 74 DEI JOB 120143 PO# 2477 Contract# ON03571 Release# 16 24hr Emergency Contact# 2016771800

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] Signature: [illegible] Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: AGUSTIN CEPERO Signature: [illegible] Month Day Year: 5 4 8 9 3

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name Signature Month Day Year

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

6 — GENERATOR MAIL TO - TSD'S STATE

883810016

State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 028, Trenton, NJ 08625-0028

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD986581413 Manifest Document No. 000005

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Hexcel Corporation
205 Main Street
Lodi, New Jersey 07644

4. Generator's Phone (201) 472-6200

A. State Manifest Document Number **NJA 1666220**

B. State Generator's ID Same

5. Transporter 1 Company Name: Laidlaw Express Inc.

6. US EPA ID Number: NJD014655513

C. State Trans. ID NJDEP581193

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (609) 297-2569

E. State Trans. ID

9. Designated Facility Name and Site Address
E.I. dupont de Nemours + Co, Inc.
Chambers Work-Route 130
Deepwater, New Jersey 08023

10. US EPA ID Number: NJD002385730

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (609) 540-2584

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Waste Chemical Process Liquid NON RCRA/NONDOT Regulated Material	XX11	TT	4000	G	X9010
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
Water 100% L
a. c.
b. d.

K. Handling Codes for Wastes Listed Above
a. c.
b. d.

15. Special Handling Instructions and Additional Information
DEI Job# 920145
PO# 2471
Contract# CW0331, Release# 15
NJ DEC# 47613
24hr Emergency Contact # 201-477-1800

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Eugene Sales | Signature | Month Day Year: 09 4 2015

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Gary Nelson | Signature | Month Day Year: 09 4 2015

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month Day Year

NJA 1000770

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

6 — GENERATOR MAIL TO - TSD'S STATE

883810017

APPENDIX C

Letter from Wastewater Facilities Regulation Program

April 30, 1993

State of New Jersey
Department of Environmental Protection and Energy
Environmental Regulation
Wastewater Facilities Regulation Program
CN 029
Trenton, NJ 08625-0029

Scott A. Weiner
Commissioner

Dennis Hart
Administrator

MAY 17 1993

CERTIFIED MAIL P 489 282 411
RETURNED RECEIPT REQUESTED

APR 30 1993

Hexcel Corporation
11711 Dublin Road
Dublin, CA 94566

Dear Permittee:

Re: NJPDES/SIU Permit No. NJ0081507 Termination
Fine Organics Corporation, Lodi, New Jersey
Bergen County
Effective Date:

Enclosed is a final TERMINATION notice concerning the Discharge Activity Code L: New Jersey Pollutant Discharge Elimination System/Significant Indirect User (NJPDES/SIU) Permit to discharge into a delegated local agency's sewage treatment plant.

The New Jersey Department of Environmental Protection and Energy (Department) has determined that your facility does not fall under any of the criteria for individual NJPDES/SIU permit pursuant to N.J.A.C. 7:14A-10.5(a); therefore, the Department has determined to terminate your individual NJPDES/SIU permit pursuant to N.J.A.C. 7:14A-7.5(c).

After the termination the permittee may continue to discharge in accordance with the delegated local agency's approved pretreatment program requirements. In addition, the permittee shall be deemed to posses a NJPDES/SIU Permit-by-Rule pursuant requirements as specified in N.J.A.C. 7:14A-13.5.

Within 30 calendar days following your receipt of this notice under N.J.A.C. 7:14A-8.6 you may submit a request for an adjudicatory hearing to reconsider or contest this action to each party listed under Part III-I of the enclosed Administrative Hearing Request Checklist and Tracking Form for Permits (Tracking Form). Regulations regarding the format and requirements for requesting an adjudicatory hearing may be found in N.J.A.C. 7:14A-8.9 through 8.13.

To request a hearing, the permittee must complete the enclosed Tracking Form and supply all the information specified in Part III of the Tracking Form. A copy of the completed, signed and dated Tracking Form, together with all the information required by Part III of the Tracking Form, including attachments where specified, must be submitted to:

Administrator
Wastewater Facilities Regulations Program
CN-029
Trenton, New Jersey 08625

Richard J. McManus, Director
Office of Legal Affairs
Trenton, New Jersey 08625

If you have any questions on this action, please contact Nilesh Naik of my staff at (609) 633-3823.

Sincerely,

Mary Jo M. Aiello

Mary Jo M. Aiello, Chief
Bureau of Pretreatment and Residuals
Wastewater Facilities Regulation Program

WFM213:nn

Enclosure

c: Final Termination Notice Distribution List

Admi ltrative Hearing Request Check
and Tracking Form for Permits

I. Permit Being Appealed:

_____
Title and Type of Permit

_____ _____
Issuance Date of Permit Permit Number

II. Person Requesting Hearing:

_____ _____
Name/Company Name of Attorney (if applicable)

_____ _____

_____ _____
Address Address of Attorney

III. Please Include the Following Information as Part of Your Request:

A. The date the permittee received the final permit;
B. A copy of the permit, list of all permit conditions and issues contested;
C. The legal and factual questions at issue;
D. A statement as to whether or not the permittee raised each legal and factual issue during the public comment period on the permit;
E. Suggested revised or alternative permit conditions;
F. An estimate of the time required for the hearing;
G. A request, if necessary, for a barrier-free hearing location for physically disabled persons;
H. A clear indication of any willingness to negotiate a settlement with the Department prior to the Department's processing of your hearing request to the Office of Administrative Law; and
I. This form, completed, signed, and dated with all of the information listed above, including attachments, to:

1. Office of Legal Affairs
ATTENTION: Adjudicatory Hearing Requests
Department of Environmental Protection and Energy
401 East State Street
CN 402, Trenton, New Jersey 08625-0402

2. Administrator
Wastewater Facilities Regulation Program
CN 029, Trenton, New Jersey 08625-0029

3. All co-permittees (w/attachments)

IV. Signature:_____ Date:_____

883810021

APR 30 1993

PUBLIC NOTICE

New Jersey Department of Environmental Protection and Energy
Wastewater Facilities Regulation
Notice of Revocation of NJPDES/SIU permits

Take notice that the New Jersey Department of Environmental Protection and Energy (Department) is terminating the individual New Jersey Pollutant Discharge Elimination System (NJPDES)/ Significant Indirect User (SIU) permits previously noticed in 25 N.J.R. 599(b), February 1, 1993.

The subject NJPDES/SIU permits were issued for wastewater discharges to delegated local agencies, which have Departmentally approved industrial pretreatment programs in accordance with 40 CFR 403 and N.J.A.C. 7:14A-13.1(a). The above facilities may continue discharging after this termination in accordance with the delegated local agencies' approved industrial pretreatment program requirements. In addition, the permittee shall be deemed to possess a NJPDES/SIU Permit-by Rule consistent with requirements as specified in N.J.A.C. 7:14A-13.5.

It was the Department's original intent not to issue individual permits to industries discharging to those local agencies with approved pretreatment programs. However, due to the delegated local agencies' limited permit enforcement authority, the Department issued individual NJPDES/SIU permits to selected SIUs, which the local agencies felt had the potential for the greatest impact on their facilities.

With the passage of the Clean Water Enforcement Act, L.1990, c.28, local agencies now have sufficient enforcement powers, and dual permitting is no longer necessary. As a result, the Department is terminating the previously noticed permits pursuant to N.J.A.C. 7:14A-2.13(a)7 and 10.5(g).

This notice is being given to inform the public that the Department is terminating the previously noticed individual NJPDES/SIU permits effective June 1, 1993 in accordance with the "Regulations Concerning the New Jersey Pollutant Discharge Elimination System" (N.J.A.C. 7:14A), which were promulgated pursuant to the authority of the New Jersey "Water Pollution Control Act" (N.J.S.A. 58:10A-1 et seq.).

Dennis Hart, Administrator
Wastewater Facilities Regulation Program
CN 029
Trenton, NJ 08625

883810022

New Jersey Pollutant Discharge Elimination System

The New Jersey Department of Environmental Protection hereby restricts and controls the discharge of pollutants to waters of the State from the subject facility/activity in accordance with applicable laws and regulations. The permittee is responsible for complying with all terms and conditions of this authorization and agrees to said terms and conditions as a requirement for the construction, installation, modification or operation of any facility for the collection, treatment or discharge of any pollutant to waters of the State.

PERMIT NUMBER NJ0081507

Permittee	Co-Permittee
HEXCEL CORPORATION 11711 DUBLIN ROAD DUBLIN CA 94566	

Property Owner	Location of Activity
HEXCEL CORPORATION 11711 DUBLIN ROAD DUBLIN CA 94566	FINE ORGANICS CORPORATION 205 MAIN STREET LODI NJ 07644

Current Authorization Covered By This Approval And Previous Authorization	Issuance Date	Effective Date	Expiration Date
L :INDIRECT DISCH TO POTW (SIU)	10/01/1992	11/01/1992	TERMINATED

By Authority of:
Commissioner's Office

DEPE AUTHORIZATION
Dennis Hart, Administrator
Wastewater Facilities Regulation Program

(Terms, conditions and provisions attached hereto)

State of New Jersey Department of Environmental Protection Division of Water Resources

NJPDESNJPDESNJPDESNJPDESNJPDESNJPDESNJPDESNJPDESNJPDESNJPDESNJPDESNJPDE

APPENDIX D

Letter from NJDEPE

December 23, 1991

State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
CN 028
Trenton, NJ 08625-0028
Tel. # 609-633-1408
Fax. # 609-633-1454

Scott A. Weiner
Commissioner

Karl J. Del
Dire

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 23 1991

Mr. Edward Hogan, Esq.
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

Dear Mr. Hogan:

RE: Hexcel Corp. - Industrial Chemicals Group ("Hexcel")
Lodi Borough, Bergen County
ECRA Case #86009

This letter is to address several out standing issues that have arisen during the Environmental Cleanup Responsibility Act (ECRA) review of the above referenced case. Hexcel shall submit to this office, with the Progress Report due on or before January 15, 1992, a revised time schedule, prepared in accordance with the attached guidelines, to include all actions necessary to address the comments listed below. The results of additional samples required below shall be submitted with the Progress Report due on or before March 15, 1992. Hexcel shall comply with all other timeframes set forth in the requirements below.

A. Ground Water

The New Jersey Department of Environmental Protection and Energy (NJDEPE) is currently reviewing the outstanding ground water issues which remain at the above referenced site. Upon completion of the review, the NJDEPE will present its comments to Hexcel.

B. Soils

1. Cleanup Plan Amendment

The NJDEPE has reviewed the Cleanup Plan Amendment dated August 9, 1991 and finds it acceptable as conditioned below:

a. Hexcel shall submit, with the Progress Report due February 15, 1992, a contaminant iso-concentration map depicting all soils samples which have been collected to date.

b. Soil Delineation Sampling

i. Alleyway - The proposal to complete the delineation to the east of sample location H/S-2and H/S-3 through the installation of boring 507 is conditionally acceptable. Hexcel shall collect continuous

done

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Recycled Paper

883810025

split spoon samples during the installation of the boring. The samples shall be field analyzed with a photoionization detector (PID). Laboratory samples shall be collected at intervals where PID readings are two times greater than background. In addition, Hexcel shall collect a sample for laboratory analysis at the six inch interval within the clay layer. The boring shall be cased-off above the clay layer, prior to completing the boring as a monitor well.

ii. Area South of Maintenance/Product Storage Building - The proposal to install two borings and collect a sample from each boring at 5.5 to 6 feet to be analyzed for total petroleum hydrocarbons (TPHC) is conditionally acceptable. Hexcel shall sample boring number 113 for priority pollutants plus 40 (PP+40), unless documentation can be provided on the former storage tanks' contents and/or area use which would confirm TPHC as the only appropriate sampling parameter. Hexcel shall collect a sample for volatile organic compounds with a forward library search (VO+15) at 0-6 inches above the water table. Samples for the remaining parameters shall be collected from an intermediate depth or as guided by field readings, visible evidence of contamination or changes in lithology. The location, sample depths and analyses for boring 114 is acceptable.

iii. Area 5 - The proposal to install a boring approximately 15 feet north of the industrial sewer is unacceptable. Hexcel shall install a boring immediately adjacent to the industrial sewer in the location depicted on the attached site map. Hexcel shall collect continuous split spoon samples during the installation of the boring to the top of clay layer, provided that the clay layer is present and the pipe invert is above the clay layer. The samples shall be analyzed with a PID. Should the clay layer not exist at in this area, or the pipe invert be below the clay layer, the boring shall be advanced to the water table and split spoon samples shall be field screened utilizing the PID. If the PID readings are greater than those identified in sample location H/S-2, Hexcel shall collect a sample(s) for VO+15 analysis from the interval(s) beneath the pipe exhibiting the highest PID reading(s).

iv. Area 6 - The proposal to install boring 613 to address the NJDEPE's requirement for a boring outside Building II is unacceptable. The proposed location of boring 613 is unacceptable for delineation of Area 6, however, this location will satisfy, in part, the requirement for delineation of Area C-3. Hexcel shall install a boring adjacent to Building II in location depicted on the attached site map. The sample depth and analysis as proposed are acceptable.

v. PAS Boring C-3 - The proposal for delineation in this area is conditionally acceptable. Hexcel shall install boring 613 to delineate this area. The sample depths and analysis as proposed is acceptable.

2. Notification

Hexcel shall notify the case manager at least two weeks before implementation of any remedial activities.

3. Reporting Requirements

Hexcel shall submit, with the Progress Report due March 15, 1992, a report detailing the soil delineation activities on the site. The report shall include, but not be limited to:

a. A narrative summary of all delineation activities, including a discussion of analytical results and conclusions.

b. A scaled site map depicting the location of all soil samples collected to date. The site map shall list the concentrations of contaminants at all sample locations. The labeling of data shall be keyed to facilitate interpretation. This labeling shall reference contaminant type, contaminant concentration, sample location and sample depth. In addition, Hexcel shall construct a contaminant iso-concentration map depicting all soils samples which have been collected to date.

c. Detailed boring logs for the soil boring/ monitor wells. The boring logs shall include: soil color and type, approximate grain size, physical characteristics (i.e., moisture, visible contamination), horizon depth and thickness, depth to ground water and/or bedrock, if encountered.

d. A summary of all field PID readings and field observations including odors and staining.

e. The analytical results of sampling shall be provided in a tabular format. Information shall include the sample number, location, interval and depth of sample, and the sample matrix.

f. Tier II laboratory deliverables shall be submitted for all samples collected and/or identified in this report.

B. Tank Closure Report

The NJDEPE has completed the review of the Tank Closure Report, dated August 27, 1991 and finds the report unacceptable. In general, the report failed to propose any additional delineation sampling and/or remediation of contaminated soils encountered in the abandonment of the two fuel oil and one gasoline Underground Storage Tank (UST) at the site.

1. Fuel Oil USTs East of Boiler Room

a. Hexcel shall fully delineate the extent of the TPHC contamination in this area. Hexcel shall install soil borings within one foot of the perimeter of the excavation, at a frequency of two per each sidewall. Samples shall be collected from a depth of 0-6 inches below the inverts of the former tanks. If the water table is deeper than two feet below the tank inverts samples shall be collected at 0-6 inches above the water table. Samples shall be analyzed for TPHC.

b. Although site-wide remediation of soil contamination via soil flushing, bioremediation or vapor stripping has been proposed, it is not clear if soil contamination in this area will be remediated as part of this proposal. Hexcel shall submit, with the Progress Report

due February 15, 1992, a proposal for soil remediation in this area.

c. Based upon the review of the aforementioned report, it appears that samples may have been collected at or below the water table, as groundwater reportedly entered the excavation. Hexcel shall submit with the Progress Report due February 15, 1992, an accurate description of the relationship between the depth below ground surface (bgs) that post-excavation samples were collected, tank inverts and depth to ground water. The description shall include:

i. The depths (bgs) that post-excavation samples were collected.

ii. The depths (bgs) of the tank inverts.

iii. The depth (bgs) to ground water.

This information is necessary to provide some indication of the depth and thickness of the contaminated vadose zone soils. In addition, if the post-excavation samples were collected below the water table, additional post excavation samples will be required.

d. The aforementioned report states that piping was removed, however, during an inspection of the site, conducted on October 16, 1991, two tank vent pipes and feed/return lines were observed against the east wall of the boiler room. Hexcel shall clarify the information regarding the removal of the aforementioned tank lines. In addition, Hexcel shall submit, with the Progress Report due February 15, 1992, a proposal for the removal of the two tank vent pipes and feed/return lines.

2. Gasoline UST Northeast of Bldg. 6

a. Post-excavation samples were reported collected from within the pit, however, sample depths were not provided. Hexcel shall submit, with the Progress Report due February 15, 1992, an accurate description of the collection of post-excavation samples. The description shall include:

i. The depths (bgs) that post-excavation samples were collected.

ii. The depths (bgs) of the tank and sewer line inverts.

iii. The depth (bgs) to ground water.

This information is necessary to provide some indication of the depth and thickness of the contaminated vadose zone soils. In addition, if the post-excavation samples were collected below the water table, additional post excavation samples, including samples along the sewer lines, will be required.

b. Although site-wide remediation of soil contamination via soil flushing, bioremediation or vapor stripping has been proposed, it is not clear if soil contamination in this area will be remediated as part of this proposal. Hexcel shall submit, with the Progress Report due February 15, 1992, a proposal for soil remediation in this area.

3. Quality Assurance/Quality Control (QA/QC) Data

APPENDIX E

Response Letter to NJDEPE

August 9, 1991

August 9, 1991

Mr. Gary Sanderson
Bureau of Environmental Evaluation and
Cleanup Responsibility Assessment
New Jersey Department of Environmental Protection
CN 028
Trenton, NJ 08625-0028

Re: Proposed Remedial Investigation Activities at the Former Hexcel Facility
Lodi Borough, Bergen County, New Jersey
ECRA Case #86009

Dear Mr. Sanderson:

The purpose of this letter is to respond to your request for additional field at the former Hexcel Industrial Chemicals Group ("Hexcel") facility located in Lodi, New Jersey, as outlined in your letter of July 12, 1991. The following letter describes investigation activities which we believe are sufficient to address those issues pertaining to soil and ground water sampling.

The site investigation activities described below, which are proposed as the final stage of remedial investigation, are intended to satisfy the requirements and recommendations set forth in your July 12, 1991 letter. The locations of all proposed monitoring wells and soil borings are indicated on Figure 1. The proposed analyses and sampling depths are summarized in Table 1. It is emphasized that some of the items in your letter request drilling of wells or borings in areas in which data have already been gathered and submitted or areas in which physical access is not possible. We are not, therefore, proposing further sampling activities in these areas, although this is certainly an area we should discuss at our upcoming meeting. In order that you understand our rationale for exclusion of these specific requests from our sampling plan, we have formulated responses to each of the items in your letter. For clarity of presentation, each item in your July 12, 1991 letter which pertains to sampling is restated below in its original form, followed by our response to the item.

A - SOILS

1. *Item 20 - Soil Delineation Sampling*

a. *Hexcel has failed to adequately delineate the full horizontal extent of soil contamination. Locations having photoionization detector (PID) readings as high as 3000 part per million (ppm) [HS2-003] have not been horizontally delineated. This delineation sampling is required, with laboratory samples taken at the horizontal clean zone and analyzed for area specific contaminants. Horizontal delineation shall occur in all 4 direction from each contaminated boring. In addition, Hexcel failed to laboratory analyze soil sample numbers HS8, HS9, HS10 for priority pollutants +40 peaks (PP+40) and total petroleum hydrocarbons (TPH).*

RESPONSE

Samples were collected from borings H/S-2, H/S-3, H/S-4, and H/S-5, as reported in the Interim Report, for the purpose of providing horizontal delineation of chemicals to the north of the alleyway. Analytical results indicated nondetectable levels of volatile organic compounds (VOCs) in borings H/S-4 and H/S-5, which establishes that the boundary of VOCs in soil is between borings H/S-3 and H/S-4. Further refinement of this delineation is not necessary for the design of the remediation program. Samples from numerous borings to the south and to the west were collected during the earlier ECRA investigation, although complete delineation in these directions was restricted by buildings. Further refinement of the delineation of VOCs in soil in an easterly direction may be possible. It is proposed, therefore, that soil samples be collected during the installation of well MW35 (discussed below) and analyzed for VOCs in order to provide delineation to the east. The boring will be designated as boring 507.

507

Samples collected from borings H/S-8, H/S-9, and H/S-10 were analyzed for VOCs only. These samples were not analyzed for PP+40 because borings 104 (MW18) and BG1 (MW01), located west and east, respectively, of these borings, did not contain detectable levels of parameters other than VOCs and TPH. In addition, only VOCs were detected in ground water in wells, with the exception of 31 μg/l of base/neutral extractable compounds detected in MW01. (It should be noted that the base/neutral compounds detected were phthalate compounds, which are common laboratory contaminants, and some of the phthalate compounds were also detected in the laboratory blanks.)

Because samples collected from borings H/S-8, H/S-9, and H/S-10 were analyzed only for VOCs, it is proposed that a new boring (designated as boring 113) be drilled immediately north of H/S-9 and that a sample be

113

collected from this boring and analyzed for TPH. Because these borings have already delineated VOCs and TPH in soils to the west and to the east, as discussed above, and delineation to the north is limited by the presence of the maintenance and product storage buildings, it is proposed that one additional boring be drilled for delineation to the south. The proposed boring, designated as boring 114, will be drilled at the Molnar Road property border, and samples collected from this boring will be analyzed for VOCs and TPH.

d. *Hexcel failed to implement Conditions 21C.1 of the Cleanup Plan Approval letter dated July 31, 1990 (Cleanup Plan Approval) for investigation of Areas 1, 5, 6, 8, and 13.*

RESPONSE

Area 1: Samples were collected from this area by Heritage Remediation/Engineering, Inc. following removal of the underground storage tanks. The samples were analyzed for TPH and polychlorinated biphenyls (PCBs). Analytical results will be submitted by Heritage in the Tank Closure Report. An additional soil boring, designated as boring 111, will be drilled in this area at the corner of the boiler room and the aboveground tank. Samples will be collected from approximately 2 feet below ground surface (BGS) and just above the water table and analyzed for VOCs. In addition, a soil boring designated as boring 112 will be drilled near the southeast corner of the aboveground tank. Samples will be collected at the top of clay only and will be analyzed for VOCs, TPH, and PCBs. It is proposed that this boring will be completed as an oil recovery well, as discussed in the forthcoming Tank Closure Report.

Area 5: Soil boring HS/2 satisfies the soil sampling requirements for this area. Analytical results for this boring were presented in the Interim Report.

Area 6: A soil boring designated as boring 613 will be drilled just outside Building II at the corner of the tank farm. Samples will be collected from depths of approximately 2 feet and 6 feet (or just above the water table) and analyzed for TPH, VOCs, and PCBs in accordance with the sampling schedule indicated in Table 1.

Area 8: Soil boring 1401 has already been drilled on the building side of the sewer pit and appears to satisfy this requirement. The locations of the boring and the sewer are indicated in Figure 1.

Area 13: Soil boring H/S-1 has already been drilled in this area. Samples collected from a depth of 13 feet BGS were analyzed for VOCs. An additional boring designated as Boring 1304 will be drilled in this area.

Samples collected from this boring from just above the water table and from approximately 2 feet BGS will be analyzed for TPH, VOCs, and PCBs. A sample collected from the top of clay will be analyzed for TPH and PCBs. Because there are numerous abandoned underground utility lines in that area, there is a possibility that one or more pipes running from Building I to manhole MH01 may be severed during drilling. If this should occur, it is proposed that the boring hole be left open in order to monitor whether or not any oily discharges enter the hole from the pipe(s). The purpose of this monitoring would be to attempt to identify the source of oil which appears sporadically in manhole MH01.

e. *Hexcel failed to collect delineation samples at PAS boring C3 (at GL-HS6), as required by the Cleanup Plan Approval.*

RESPONSE

PAS boring C3 was located at the southwest corner of the tank farm (AEC 6). The Final Cleanup Plan approval requires that a boring be drilled in this area and that delineation samples be collected around the boring. Boring 601 satisfies the requirement for a soil boring in this area. Delineation samples that have already been collected and analyzed include boring 1302 to the south, boring 701 to the west, and borings 703 and 901 to the north. Boring 613, discussed above under A.1.d, will provide delineation of chemical distributions to the east.

2. *Item 21 - Storm Sewer Outfall*

a. *Hexcel failed to collect sediment samples for PCBs, as required by the Cleanup Plan Approval. Although the interconnection between the industrial sewer and the storm sewer was closed in March 1990, impacts from previous discharges shall be documented. Because of the long time period (nearly one year) that has elapsed since the sealing of the discharge, downstream sediment samples are required in addition to sediment samples at the discharge point. Hexcel shall, within 30 days of receipt of this letter, sample the sediments at a depth of 0-2 inches at the discharge point and at intervals of 10 feet, 20 feet, and 30 feet downstream. Additionally, all stained or discolored areas in the vicinity of the discharge point shall be sampled. Hexcel shall collect all samples in accordance with the methods specified in the Department's Field Sampling Procedures Manual dated February 1988. In addition, Hexcel shall notify the case manager at least two weeks before implementation of sampling.*

RESPONSE

Hexcel agrees to collect the sediment samples for PCB analysis as requested.

2. *Determining Off-Site Receptors*

The Department has completed the review of the Proposal to Determine Off-Site Receptors, dated October 15, 1990, and finds the proposal acceptable with the following comment. As stated in the Cleanup Plan Approval, the Department recommends that piezometers be installed in the stream bed and screened in both aquifers. The installation of the piezometers, in conjunction with the staff gages and the sediment samples, would present more conclusive evidence concerning the head relationships between the aquifers and the river in determining whether the lower consolidated aquifer discharges into the stream bed.

RESPONSE

Installation of piezometers in both aquifers in the stream bed is not considered feasible because of anticipated difficulties with access and drilling. Alpine Geophysical recently conducted an investigation for the Army Corps of Engineers which required collection of samples from borings in Saddle Brook. In the course of this investigation, it was determined that borings could not be drilled in Saddle Brook because the current was too strong. In addition, even in the event that wells could be drilled in Saddle Brook, the well heads would likely be damaged during storm flooding, potentially creating a conduit from the stream into the aquifers. We anticipate that the study discussed in our October 15, 1990 proposal will provide adequate evidence that the relationship between the river and the aquifers is as shown in the conceptual cross section shown in Figure 2.

3. *Progress Report Dated November 12, 1990 - Off-Site Monitor Wells*

In order to fully delineate the extent of ground water contamination at the site, it is recommended that Hexcel install the following monitor wells. Wells MW33 and MW34 should be installed off-site, across Main Street. Well MW35 should be installed on-site, behind Vincenzo's Restaurant. Well MW36 should be installed off-site, in front of Vincenzo's. Well MW37 should be installed on-site, north of well MW21. All well locations are shown on the attached plot plan. Drilling, spooning, and well completion specifications are as stated above for MW32.

5 wells selected for

RESPONSE

Hexcel has unsuccessfully attempted to gain access rights from the residents across Main Street for installation of wells MW33 and MW34. Because permission was not granted by the owners of the properties, these wells cannot be installed as shown. Well MW35 will be installed as requested. Well MW36 cannot be installed because overhead power lines, underground utility lines, and limited space prohibit the use of a drill rig in this area. In addition, construction of a

well in this area would require closing off Main Street, which may not be acceptable to the Borough of Lodi. Well MW37 will be installed as requested.

4. *Site Inspection of December 12, 1990*

During the site inspection conducted on December 20, 1990, it was noted that dense nonaqueous phase liquid (DNAPL) fumes from monitor well MW07 melted the well cap. The Department is concerned over the possibility of the DNAPL fumes degrading the inner PVC casing of the well. Therefore, Hexcel shall conduct an inspection to determine the integrity of the well. Should the integrity of the the well be threatened, Hexcel shall seal the well using tremie groat. Please be advised that wells must be abandoned by a New Jersey licensed well driller certified to abandon wells. Hexcel shall submit the well abandonment forms to the Bureau of Water Allocation, with copies to be submitted to this office. Should you have any questions regarding well abandonment, pelase contact the Bureau of Water Allocation at 609-29202957 for guidance. Should the integrity of the well be threatened, Hexcel shall propose a replacement well which would be compatible with the DNAPL fumes.

RESPONSE

Because degradation of the well casing by DNAPL would likely result in the presence of either DNAPL or high concentrations of solubilized chemicals in the deep aquifer, it is proposed that the concern over the integrity of these deep wells be addressed by collection of ground water samples from the deep aquifer from wells MW07 and MW09. It is emphasized that low concentrations of VOCs in these wells are not indicative of deterioration of the well casings, as VOCs were already detected in these wells immediately following well completion.

5. *Additional Ground Water Requirements*

b. *Hexcel shall, within 30 days of receipt of this letter, install one additional DNAPL delineation/recovery well approximately 30 feet south-southeast of RW7-8, as shown on the attached plot plan. Specifications should be consistent with the other RW7 series wells.*

RESPONSE

Approximately 1,100 gallons of DNAPL have been extracted since the implementation of the DNAPL recovery system and the thickness of the DNAPL layer has been reduced substantially. In June 1991, there was no measurable DNAPL in well RW7-8 or in well RW7-2, the nearest accessible well at that time, as reported in the June Monthly Project Status Report. Product thicknesses in all accessible wells in that area were again measured on August 6, 1991 in order to determine the current lateral extent of DNAPL at the site. The results, which will be reported in the September 15, 1991 progress report, were similar to those reported in the

June Monthly Project Status Report. DNAPL was identified in only three wells. Well RW7-8 was not accessible, but there was no measurable DNAPL in well RW7-1, located less than 20 feet to the north. Because the product thickness measurements in June and August 1991 indicate that the DNAPL layer in this area is negligible, installation of an additional well is not warranted.

c. *Hexcel shall submit, with each Progress Report, ground water contour maps of the static water level from all monitor wells and any recovery wells which allow access in both aquifers. These measurements shall be secured monthly, at a minimum. While the cleanup contractor is conducting continuous work at the site, the static water level measurements shall be collected weekly, at a minimum. This data are critical as a base line for evaluating the hydraulic response of both aquifers to pumping and reinjection. Ground water elevation contour maps shall be produced for each data set for each aquifer and shall be included in the monthly Progress Reports. Additionally, static or pumping water level measurements shall be recorded for the bedrock supply well on the same schedule.*

RESPONSE

Because the static ground water level at the site is not expected to vary significantly prior to the startup of the ground water extraction system, it is proposed that, beginning in September 1991, water level measurements in all wells be conducted on a quarterly basis until the extraction system is in operation. More frequent measurements would be conducted during startup of the ground water recovery system in order to monitor the hydraulic response of the aquifers to pumping.

g. *Hexcel shall determine the static water level in the deep on-site suupply well (non-pumping conditions), and the typical pumping water level. Additionally, the integrity and length of the casing and the total depth of the well shall be determined. The caliper, natural gamma, spontaneous potential and resistivity logs that were run on the top 250 feet of the well in November 1988 should be evaluated to determine if permeable zones exist. Productive zones seem to occur at depths of 62-64 feet and at 125-127 feet. Water samples from discrete relatively productive zones, obtained through packers, should be collected for VO+15 analysis using Method 624. Results of these investigations on the supply well shall be reported in the Progress Report due September 15, 1991.*

RESPONSE

Hexcel is currently contacting drillers in order to determine the feasibility of collecting water samples as specified above. If it is determined that these activities are feasible, Hexcel will conduct the sampling as requested.

6. *Additional Ground Water Concerns*

a. *In order to determine whether the ground water contaminant plume has moved in an easterly direction it is necessary that Hexcel install one additional well (MW32) at the intersection of Main Street an Molnar Road, as indicated on the attached plot plan. In support of this delineation strategy, it is recommended that Hexcel target the total depth of the well to the top of clay, expected at a depth of about 10 feet. Continuous split spoons should be collected from 7 feet to the terminal depth. The screen length should extend from the top of the clay up to within 3 feet of the ground surface. If the clay is not encountered, tremie grout the bottom 10 feet of the borehole and then install five feet of screen. The top of screen should be set at least one foot above the water table, field conditions permitting.*

RESPONSE

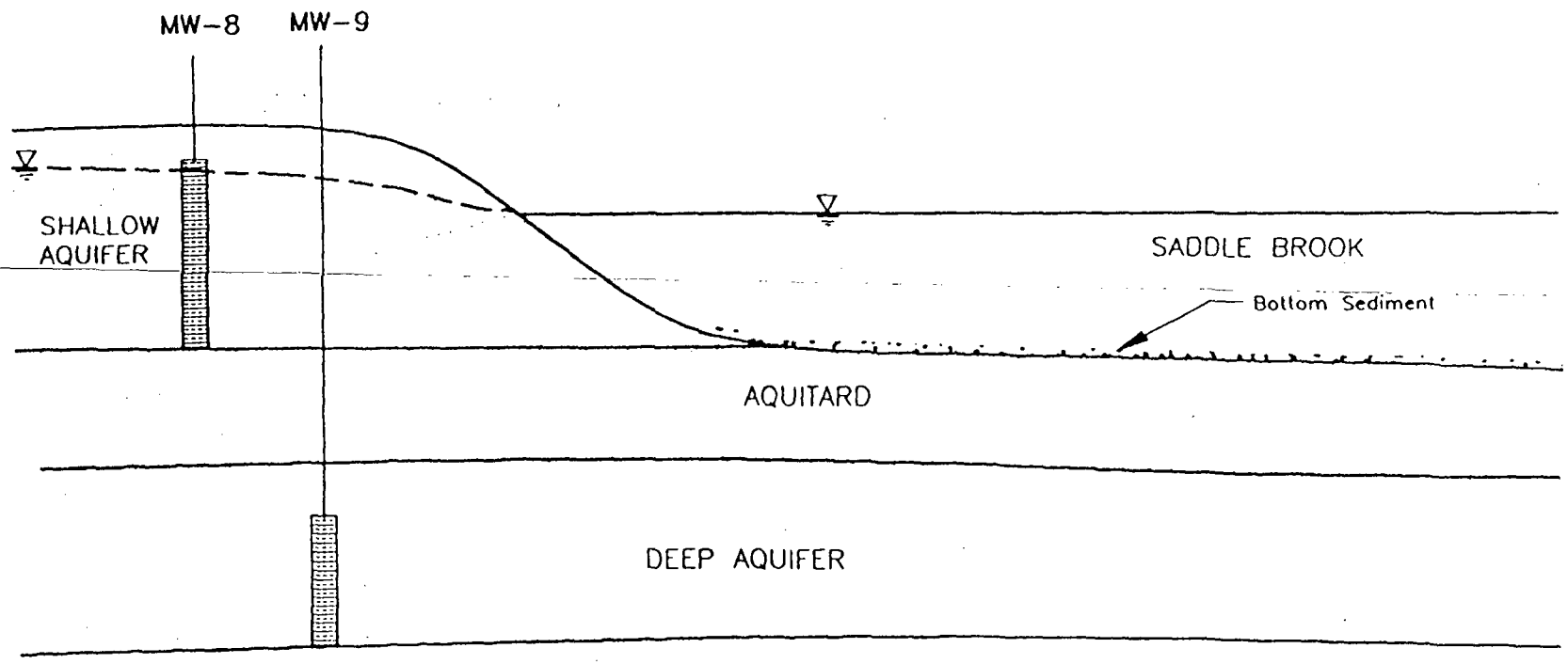
Hexcel has installed a monitoring well, designated MW22, on Molnar Road approximately 20 feet west of the Main Street intersection. It is not possible to install a well closer to the intersection because overhead power lines prohibit the use of a drill rig in that area.

We look forward to discussing this sampling plan with you at our meeting the week of August 19, 1991.

Sincerely,

A. William Nosil

cc: Brian Sogorka, BEECRA
Karen Fell, BGWDC



NOT TO SCALE

ENVIRON
Counsel in Health and Environmental Science

Conceptual Cross Section
Aquifer/River Configuration
Former HEXCEL Facility
Lodi, NJ

Drafter: RS | Date: 8/91 | Contract Number: 03 0536A | Approved | Revised:

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