



# California Regional Water Quality Control Board

## San Francisco Bay Region



Linda S. Adams  
Secretary for  
Environmental  
Protection

1515 Clay Street, Suite 1400, Oakland, California 94612  
(510) 622-2300 • Fax (510) 622-2460  
<http://www.waterboards.ca.gov/sanfranciscobay>

Arnold Schwarzenegger  
Governor

Date: May 11, 2009  
File No. 43S0225 (MS)

Pilkington North America, Inc.  
Attn: Pamela A. Rygalski  
[pamela.rygalski@us.pilkington.com]  
140 Dixie Highway  
Rossford, Ohio 43460

SUBJECT: Tentative Order for Rescission of Site Cleanup Requirements (Order No. 95-034) for former Pilkington Barnes Hind facility located at 895 Kifer Road, Sunnyvale, Santa Clara County

Dear Ms. Rygalski:

Attached please find the Tentative Order for rescission of Site Cleanup Requirements Order No. 95-034 (Order) for the subject property.

This matter will be considered for adoption at the Regional Water Board's monthly public meeting on July 8, 2009. The meeting will start at 9:00 a.m. and will be held at the Elihu Harris State Building (1st Floor Auditorium) at 1515 Clay Street in Oakland. Any written comments on the Tentative Order by you or interested persons must be submitted to Regional Water Board staff by **June 11, 2009**, in order to be considered by the Regional Water Board.

Pursuant to section 2050(c) of Title 23 of the California Code of Regulations, any party that challenges the Regional Water Board's action on this matter through a petition to the State Water Board under Water Code section 13320 will be limited to raising only those substantive issues or objections that were raised before the Regional Water Board at the public hearing or in timely submitted written correspondence delivered to the Regional Water Board (see above).

If you have any questions regarding this letter, please contact Max Shahbazian of my staff at (510) 622-4824, or by e-mail [MShahbazian@waterboards.ca.gov].

Sincerely,

Bruce H. Wolfe  
Executive Officer

Attachment: Tentative Order  
cc with attachment: Mailing List

## MAILING LIST

Former Pilkington Barnes Hind  
895 Kifer Road, Sunnyvale, CA 94086

### Via E-mail:

Frank Dellechaie (fdellech@dtsc.ca.gov)  
Department of Toxic Substances Control

George Cook (GCook@ValleyWater.org)  
Santa Clara Valley Water District

Ron Staricha  
(RStaricha@ci.sunnyvale.ca.us)  
City of Sunnyvale, Public Safety  
Department

Shahid Waheed [swaheed@rtsusa.com]  
Reliance Technical Services  
895 Kifer Road  
Sunnyvale, CA 94086

Van Wolf (vwolf@swlaw.com)  
Snell & Wilmer, LLP

Philip Smith (pgsmith@treadwellrollo.com)  
Joshua Graber (jdgraber@treadwellrollo.com)  
Treadwell & Rollo, Inc.

Nick Walchuk  
(nwalchuk@environcorp.com)  
Environ International Corporation

Lucian Popescu  
(Lucian.Popescu@zodiacaerospace.com)  
Icore International, Inc.

Sid McDonald (sidmcdonald@yahoo.com)  
Former Royal Auto Body

Gail Jones (gail@eras.biz)  
ERAS Environmental, Inc.

Ken Schiffer (kschiffer@spang.com)  
Spang & Company  
Edward Sangster (esangster@kln.com)  
Attorney for Spang & Company

Jack Hardin (jack.hardin@stantec.com)  
Stantec Consulting Corporation

Don Mederios  
(don@fabtech-mechanical.com)  
154 San Lazaro Avenue  
Sunnyvale, 94086

James Hawley (jhr@hogefenton.com)  
Attorney for John Travis

Mike Near (mnear@NCH.com)  
Mohawk Laboratories

Kirsten Duey (kduey@thesourcegroup.net)  
The Source Group, Inc.

### Via U.S. mail:

Bill Garlock  
Garlock & Company  
1450 El Camino Real  
Menlo Park, CA 94025

Susan Gagner  
162 North Wolfe Road  
Sunnyvale, CA 94086

David and Maria Crowninshield  
Elaine Gallus  
165 San Lazaro Avenue  
Sunnyvale, CA 94086

John Travis  
162 San Lazaro Avenue  
Sunnyvale, CA 94086

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

TENTATIVE ORDER

RESCISSION OF SITE CLEANUP REQUIREMENTS (ORDER NO. 95-034) FOR:

PILKINGTON BARNES HIND

for the property located at

895 KIFER ROAD  
SUNNYVALE, SANTA CLARA COUNTY

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

1. **Regional Water Board Orders:** The Regional Water Board adopted site cleanup requirements for this site on February 15, 1995 (Order No. 95-034).
2. **Summary of Investigation and Remediation Activities:**  
The former Pilkington Barnes Hind (PBH) facility (site) is located at 895 Kifer Road in Sunnyvale, south of the Central Expressway, near the intersection of San Lazaro Avenue and Kifer Road (see site location map). Land use in this area is generally industrial and commercial. PBH historically manufactured contact lens solutions, including saline and cleaning solutions. Volatile organic compounds (VOCs) were used in the manufacturing operations at the site. Manufacturing operations at the site ceased in 1990, and PBH sold the site to Reliance Technical Services in 1995.

Soil and groundwater investigations conducted at and near the PBH facility indicate that shallow groundwater beneath the site is impacted with trichloroethene (TCE). PBH initiated water quality investigations at the site in the late 1980s. Five groundwater monitoring wells have been used for monitoring the VOC plume beneath the site since 1994. The current (April 2008) maximum concentration of TCE in onsite monitoring wells BHW-3 and BHW-5 are 110 micrograms per liter (ug/L) and 230 ug/L, respectively.

Several adjacent properties have had known or suspected VOC releases, including the former Magnetics facility (located west of PBH at 158 San Lazaro Avenue) and Fabtech Mechanical (located west of PBH at 154 San Lazaro Avenue). The Regional Water Board has required investigation and remediation of these adjacent sites. In 2007,

Magnetics excavated and removed a sump and the VOC-impacted soil from 158 San Lazaro Avenue, and injected permanganate beneath the site to break down the VOCs in groundwater.

PBH operated an onsite groundwater pump and treatment system (GWPTS) from 1994 through 1998. The GWPTS was shut down at that time because it was believed that the pumping was pulling in contaminated groundwater from other sites. Monitored natural attenuation of the remaining VOCs in groundwater is the current cleanup approach for the site.

3. **Basis for Rescission:** Rescission of Order No. 95-034 is appropriate for the following reasons:
- Contaminant sources have been evaluated. Several soil and groundwater investigations were performed at and around the site. Over two dozen soil borings were drilled and more than four dozen soil and two dozen groundwater samples were collected and tested for VOCs. The results did not identify a clear source of VOCs at the site.
  - The site has been adequately characterized. Five monitoring wells were installed. The wells were monitored for VOCs for five to fifteen years. The results indicate that the shallow water-bearing zone beneath the site is impacted with VOCs.
  - Exposure pathways, receptors, and potential risks, threats, and other environmental concerns have been adequately evaluated. Shallow groundwater beneath the site is not currently used for drinking water.
  - Sources of onsite pollution have been remediated to the extent practicable. PBH pumped and treated the impacted groundwater beneath the site for five years and then monitored groundwater concentrations for another ten years.
  - The groundwater plume is stable to retreating. TCE and PCE concentrations in shallow groundwater have gradually decreased and reached asymptotic levels for the past five years. The current maximum concentration of TEC in onsite groundwater monitoring well BHW-5 is 230 ug/L. This concentration represents a reduction of 95% from the high concentration of 5,100 ug/L detected in 1994.
  - Cleanup standards will be met within a reasonable timeframe. Natural attenuation is expected to reduce TCE concentrations in shallow groundwater to below drinking water standards before the groundwater will be used as a source of drinking water.

- There are no unacceptable risks to human health, ecological health, and sensitive receptors, considering current and reasonable future land and water uses. TCE and PCE concentrations in groundwater are below the Regional Water Board's environmental screening levels for potential vapor intrusion into indoor air. There are no unacceptable threats to groundwater and surface water resources, considering current and reasonable future beneficial uses.
4. **Next Steps Prior to Case Closure:** Monitoring wells owned by the discharger need to be properly closed before case closure so that they do not become abandoned wells or act as vertical conduits for any new releases.
  5. **CEQA:** This action rescinds an Order to enforce the laws and regulations administered by the Regional Water Board. All actions mandated by the Order have been completed and no further action will occur. As such, the Regional Water Board finds that the rescission of the Order is not a project as defined in the California Environmental Quality Act (CEQA).
  6. **Notification:** The Regional Water Board has notified the discharger and all interested agencies and persons of its intent under California Water Code Section 13304 to rescind site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.
  7. **Public Hearing:** The Regional Water Board, at a public meeting, heard and considered all comments pertaining to this discharge.

**IT IS HEREBY ORDERED**, pursuant to Section 13304 of the California Water Code, that Order No. 95-034 is rescinded.

**IT IS FURTHER ORDERED** that the discharger shall properly close all groundwater monitoring wells consistent with applicable local agency requirements, and shall document such closure in a technical report to be submitted to the Regional Water Board by October 31, 2009.

I, Bruce H. Wolfe, 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 \_\_\_\_\_.

\_\_\_\_\_  
Bruce H. Wolfe  
Executive Officer

=====

**FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY**

=====