

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 99-015

AMENDMENT OF SITE CLEANUP REQUIREMENTS (ORDER NO. 98-018) FOR:

PUREX INDUSTRIES, INC.;  
BARON-BLAKESLEE, INC., A DELAWARE CORPORATION;  
ALLIEDSIGNAL, INC.; AND  
W. HOWARD AND CATHERINE JONES

for the property located at

511 O'NEILL AVENUE  
BELMONT  
SAN MATEO COUNTY

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

1. **Regional Board Orders:** The Board adopted site cleanup requirements for this site on March 18, 1998 (Order No. 98-018). This Order was adopted pursuant to Water Code Section 13304.
2. **Reason for Amendment**
  - a. **Remedial Investigation:** Task B.3.b of Order No. 98-018 requires the dischargers to submit a technical report documenting completion of off-site remedial investigation by April 1, 1999. The dischargers have conducted three phases of investigations since March 1998, but have not fully defined the lateral and vertical extent of the plume. The off-site investigation has not been completed due to phased investigations and difficulties in obtaining access agreements from multiple downgradient property owners.

The dischargers submitted a status report on February 5, 1999. This report summarized project status, potentially applicable remedial technologies, and data needed to implement remedial actions. The dischargers also submitted a workplan for phase four remedial investigation on April 12, 1999 to delineate the off-site plume. Board staff conditionally approved this workplan on April 14, 1999. The detected trichloroethene and cis-1,2-dichloroethene concentrations in groundwater suggest the presence of dense nonaqueous phase liquid (DNAPL) at and near the site. It is very difficult to remove residual DNAPL by conventional pump and treat system. Additional investigation

efforts and feasibility studies are needed to determine the potential DNAPL areas and evaluate appropriate remedial measures. It is also possible that the plume has migrated further off-site, and the dischargers may need additional time to fully define the extent of the off-site plume.

- b. **Workplan for Interim Remedial Action:** Task B.4 of Order No. 98-018 requires the dischargers to submit a workplan to evaluate interim remedial action alternatives and to recommend one or more alternatives for implementation by October 1, 1998. The dischargers did not submit a workplan for interim remedial actions because the remedial investigation is not finished, for reasons noted above. Due to the size of the plume, presence of DNAPL, and hydrogeological complexity of the site, interim remedial actions for groundwater are not required. Instead, the dischargers will propose two separate remedial action plans (RAP #1 for the area west of 260-498 Harbor Blvd. western property boundary and RAP #2 for the area east of 260-498 Harbor Blvd. western property boundary ). RAP #1 will be submitted in the next nine months after the dischargers identify the preferential pathways and perform pump tests for the area west of 260-498 Harbor Blvd. western property boundary.
  - c. **Interim Remedial Actions Implementation:** Task B.5 of Order No. 98-018 requires the dischargers to submit a technical report documenting implementation of interim remedial actions by April 1, 1999. For the reasons cited in findings 2.a and 2.b above, interim remedial actions for groundwater are not required.
  - d. **Proposed Final Remedial Actions and Cleanup Standards:** Task B.6 of Order No. 98-018 requires the dischargers to propose final remedial actions and cleanup standards for the site by April 1, 2000. The dischargers have not finished remedial investigation and will need more time to identify the preferential pathways and determine the lateral and vertical extent of the plume. The dischargers will propose RAP #1 for the area west of 260-498 Harbor Blvd. western property boundary in the next nine months. The dischargers will also propose RAP #2 when they finish remedial investigation for the remaining off-site plume, the area east of 260-498 Harbor Blvd. western property boundary.
3. **CEQA:** This action is an amendment of an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.
  4. **Notification:** The Board has notified the dischargers and all interested agencies and persons of its intent under California Water Code Section 13304 to amend site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.

**IT IS HEREBY ORDERED**, pursuant to Section 13304 of the California Water Code, that Order No. 98-018 shall be amended as follows:

A. Task 3.b. is revised as follows:

**COMPLETION OF OFF-SITE REMEDIAL INVESTIGATION  
(INCLUDING 260-498 HARBOR BLVD.)**

**COMPLIANCE DATE: September 30, 1999**

Submit a technical report acceptable to the Executive Officer documenting completion of an additional off-site remedial investigation to define the lateral and vertical extent of the plume as proposed in the April 12 workplan as conditionally approved on April 14, 1999. The technical report should document installation of monitoring wells (proposed in October 13, 1998, workplan addendum as conditionally approved on December 2, 1998) and results of pump testing as proposed in the February 5, 1999, technical report. This technical report should include a workplan for further off-site remedial investigation if the latest investigation results warrant an additional off-site investigation to delineate the plume.

B. Tasks B.4 and B.5 are deleted.

C. Task B.6 is revised as follows:

**a. PROPOSED REMEDIAL ACTION PLAN AND CLEANUP  
STANDARDS (RAP #1) FOR THE AREA WEST OF 260-498 HARBOR  
BLVD. WESTERN PROPERTY BOUNDARY**

**COMPLIANCE DATE: December 31, 1999**

Submit a technical report acceptable to the Executive Officer containing:

- a. Results of the remedial investigation
- b. Feasibility study evaluating alternative final remedial actions
- c. Risk assessment for current and post-cleanup exposures
- d. Recommended final remedial actions and cleanup standards
- e. Implementation tasks and time schedule

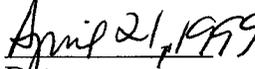
Item "b" should include projections of cost, effectiveness, benefits, and impact on public health, welfare, and the environment of each alternative action.

Items "a" and "c" should be consistent with the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), CERCLA guidance documents with respect to remedial



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.

  
Loretta K. Barsamian  
Executive Officer

  
Date