

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

**ADDENDUM NO. 2 TO CLEANUP AND ABATEMENT ORDER NO.  
R9-2017-0041 AN ADDENDUM TO ADD DIRECTIVE P, AMEND  
DIRECTIVE E AND  
REVISE THE DEADLINE FOR DIRECTIVE E FOR ORDER NO.  
R9-2017-0041**

**FORMER ELECTRALAB FACILITY, 1105 SECOND STREET, ENCINITAS,  
CALIFORNIA**

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

1. **INVESTIGATIVE ORDER NO. R9-2017-0041.** Except as contradicted or superseded by the findings and directives set forth in this Addendum No. 2 to Cleanup and Abatement Order No. R9-2017-0041 (Order), all previous findings and directives of the Order and Addendum No. 1 remain in full force and effect.
2. **ADDITIONAL INVESTIGATION NEEDED TO SUPPORT FEASIBILITY STUDY.** Pursuant to Directive D of the Order and Addendum No. 1 to the Order, the Dischargers<sup>1</sup> submitted a Site Investigation Report (Report) on June 28, 2018. The San Diego Water Board approved the Report on November 8, 2018. In accordance with the Order, the Board set a February 8, 2019, deadline for submittal of the Feasibility Study (90 days after approval of the Report). On January 16, 2019, TE Connectivity Inc. (TEC) requested an extension of time for submittal of the Feasibility Study required under Directive E, in accordance with Provision M.9 of the Order,<sup>2</sup> stating that, “the existing body of information was insufficient to effectively evaluate remedial alternatives consistent with the requirements of [Directive] E of the CAO....”

TEC proposed to prepare a work plan addendum for additional investigation activities. The activities would consist of additional investigation to characterize the limits of secondary source material, bench-scale studies to assess the feasibility of reductive dichlorination and chemical oxidation remedial technologies, and collection of hydraulic data

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<sup>1</sup> TE Connectivity Inc., Tyco International (US) Inc., Electralab Printed Electronics Corporation, and Self-Realization Fellowship.

<sup>2</sup> Letter from TE Connectivity Inc. to San Diego Water Board dated January 16, 2019. Request for Extension for the Submittal of the Feasibility Study Report, Former Electralab Printed Electronics Corporation Facility, 1105-1139 Second Street, Encinitas, California, Cleanup and Abatement Order No. R9-2017-0041.

to evaluate feasibility of technologies that may impact cliff stability. TEC requested a due date for the work plan addendum of February 25, 2019, and a due date for the Feasibility Study of April 1, 2020.

Directive C.5 of the Order recognizes “that work plan addenda and supplementary investigations and monitoring may be required to further characterize the site and evaluate remedial alternatives.” According to TEC, the proposed schedule to complete the additional studies was developed in consideration of (1) the need to obtain site access from the Self-Realization Fellowship church and (2) the need for an extended time period during which to perform bench-scale testing as a result of concerns regarding effectiveness and longevity of remedial technologies due to poor water quality that could interfere with remedy success.<sup>3</sup> TEC asserts that data collected during two previous phases of field investigation are inadequate to fully characterize the site in advance of developing remedial alternatives for the Feasibility Study.

Providing the Dischargers until February 25, 2019, to submit a Work Plan Addendum to conduct the work needed to complete additional studies is reasonable in light of the need to prepare an adequate Feasibility Study that addresses all affected media. Providing the Dischargers until April 1, 2020, to submit a Feasibility Study is reasonable in light of the need to properly assess the viability of various remedial technologies to treat affected groundwater, which is a significant secondary source for vapor intrusion at the site. TEC has proposed to submit the results of implementation of the Work Plan Addendum with the Feasibility Study.

3. **CALIFORNIA ENVIRONMENTAL COMPLIANCE ACT.** This action is exempt from the provisions of the California Environmental Quality Act in accordance with section 15061(b)(3) of chapter 3, title 14 of the California Code of Regulations because it can be seen with certainty that there is no possibility that the activity in question will have a significant effect on the environment.

**IT IS HEREBY ORDERED** that, pursuant to Water Code sections 13267 and 13304, Order No. R9-2017-0041 is amended as follows:

1. Directive P is added to the Order:
  - P. **SITE INVESTIGATION WORK PLAN ADDENDUM NO. 2.** The Dischargers shall submit a Site Investigation Work Plan Addendum No. 2 (Work Plan Addendum) describing site investigation work to be performed in support of development of the Feasibility Study. The

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<sup>3</sup> Additional information on the need for and timeframe of bench-scale studies was provided in a January 31, 2019, memorandum from Stantec, on behalf of TEC, to the San Diego Water Board.

scope of activities in the Work Plan Addendum shall provide sufficient data to develop an effective remediation approach in accordance with the requirements of the Order. The San Diego Water Board must receive the Work Plan Addendum for approval no later than **February 25, 2019**, and it shall contain, at a minimum, the following information:

1. **Sampling and Analysis Plan.** The Work Plan Addendum shall include a Sampling and Analysis Plan that describes the proposed sampling methodologies, analytical methods, sampling locations, and quality assurance/quality control (QA/QC) procedures to be followed for the proposed soil, groundwater, and soil vapor sampling for secondary source characterization. Sampling shall not proceed without written concurrence from the San Diego Water Board.
  2. **Bench-Scale Study Plan.** The Work Plan Addendum shall include a description of the bench-scale treatability study. The plan shall include information on the methods to be used for batch testing and column testing, the types of amendments to be tested, a list of analytes, and sampling frequency for the various phases of testing. The plan shall also include criteria for determining when to terminate the testing.<sup>4</sup>
  3. **Hydraulic Study Plan.** The Work Plan Addendum shall include a description of the studies needed to collect additional hydraulic data including slug testing select monitoring wells and any other work anticipated.
  4. **Activity Completion Schedule.** The Work Plan Addendum shall include a schedule for completion of all activities.
2. Directive E of the Order is amended as follows:
- FEASIBILITY STUDY.** The Dischargers shall prepare a Feasibility Study to evaluate cleanup alternatives capable of preventing contaminant migration and protecting human health. The Dischargers shall submit the Feasibility Study to the San Diego Water Board for approval no later than ~~90 calendar days after approval of the Site Investigation Report~~ **April 1, 2020**.
3. The following four components are added to Directive E (Feasibility Study) of the Order:

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<sup>4</sup> The January 31, 2019, memorandum states, "The study will be conducted for a sufficient period to evaluate amendment longevity and passivation rates."

5. **Methodologies.** The Feasibility Study shall describe the methodologies used to implement the Work Plan Addendum. This shall include field methodologies used for soil vapor sampling, soil sampling, groundwater sampling, and any other field sampling-related activities, including drilling and soil logging. This shall also include the methodologies used for bench-scale studies and hydraulic testing.
  6. **Laboratory Analyses.** The Feasibility Study shall present results of all analyses performed in accordance with the Work Plan Addendum including laboratory analytical methods and QA/QC sample results. All sampling data shall be presented in tabular format that includes the sample location, result, depth (if applicable), and sampling date.
  7. **Sample Locations and Number.** The Feasibility Study shall describe the locations and number of samples collected, and include a map showing the new sample locations.
  8. **Conclusions.** The Feasibility Study shall include conclusions based on the results of the additional work performed in accordance with the Work Plan Addendum.
4. Directive L of the Order is replaced with the following:

**COMPLIANCE DATES.** For easy reference, the compliance dates required by the CAO are repeated below.

Directive	Directive Requirement	Due Date
C	Site Investigation Work Plan	60 calendar days after CAO adoption
D	Site Investigation Report	June 30, 2018
E	Feasibility Study	90 calendar days after Site
		<u>Investigation Report approval</u> April 1 2020
G	Notification Plan	Within 60 days of CAO adoption

