

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

**ATTACHMENT TO CAO NO. R9-2010-0007**

**SUMMARY OF REGIONAL BOARD ENFORCEMENT HISTORY FOR THE  
FORMER HEBDON ELECTRONICS FACILITY  
2250 MEYERS AVENUE, 655 OPPER STREET, 665 OPPER STREET  
ESCONDIDO, CALIFORNIA 92069**

1. On June 12, 1997; this Regional Board issued CLEANUP AND ABATEMENT ORDER NO. 97-46 for FORMER HEBDON ELECTRONICS FACILITY, 655 OPPER STREET, ESCONDIDO, SANDIEGO COUNTY (hereinafter "CAO 97-46") based upon unauthorized discharges of wastes to groundwater from former circuit board manufacture, in violation of Water Code Section 13304 . Wastes attributable to operations at the Former Hebdon Facility included: 1,1,1-TCA; TCE and its chemical breakdown products; Methyl Ethyl Ketone (MEK); Acetone; Methylene Chloride; Gasoline (TPH); Lead; Chromium; Chloride; Sulfate; and Total Dissolved Solids.
2. On June 27, 1997, Addendum No. 1 to CAO 97-46 was issued, correcting the address of the referenced property in Directive No. 1.
3. On April 20, 1998, Notice of Violation 98-59 (hereinafter NOV 98-59) was issued for failure to submit a technical report as directed in CAO 97-46.
4. On May 13, 1998, CAO 97-46 and Addendum No. 1 to CAO 97-46 were rescinded and CLEANUP AND ABATEMENT ORDER NO. 98-58 for FORMER HEBDON ELECTRONICS FACILITY, 655 OPPER STREET, ESCONDIDO, SAN DIEGO COUNTY (hereinafter CAO 98-58) was issued. The new CAO named additional parties and set a new compliance schedule, in response to concerns raised in a public hearing.
5. On September 10, 1998, Notice of Violation (NOV) 98-103 was issued for failure to submit a technical report as directed in CAO 98-58.
6. On November 25, 1998, Addendum No. 1 to CAO 98-58 was issued, extending the original compliance dates and rescinding NOV 98-103.
7. On January 15, 1999, the Dischargers submitted a *Groundwater Monitoring Program Workplan* in compliance with Directive No.5 of CAO 98-58.
8. On February 1, 1999, the Dischargers submitted a *Site Investigation Workplan* in compliance with Directive No. 1 of CAO 98-58.

9. On February 11, 1999, Addendum No. 2 to CAO 98-58 was issued, revising analytic requirements for groundwater samples.
10. On April 20, 1999, Notice of Violation 99-29 was issued for failure to submit a technical report as directed in Directive 15 of Addendum No. 1 to CAO 98-58.
11. On April 27, 1999, the Dischargers submitted a quarterly groundwater monitoring report, First Site Monitoring Report, Spring 1999, Meyers-Opper Site, Escondido, CA in response to NOV 99-29.
12. On August 30, 1999, the Dischargers submitted a combined report, *Site Investigation and Second (Quarterly GW) Site Monitoring Report* in compliance with Directive 3 (Soil and Groundwater Investigation Report) and Directive 15 of CAO 98-58.
13. On October 15, 1999, the Dischargers submitted an Interim Removal Action Plan (IRAP) for Clarifier/Solution Separating Sumps in compliance with Directive 16 of CAO 98-58.
14. On June 9, 2000, the Dischargers submitted a Logistics Plan for Interim Removal Action Plan for the Meyers/Opper Site for excavation and removal of contaminated soils in compliance with Directive 16 of CAO 98-58.
15. On September 18, 2000, Addendum No. 3 to CAO 98-58 was issued, setting deadlines for completion of the IRAP and revising the submission deadline for a Feasibility Study as required by Directive No. 4.
16. On March 1, 2001, the Dischargers submitted the Interim Removal Action Report, Former Hebdon Electronics Facility, Escondido, California, in response to Addendum No. 3.
17. On April 27, 2001, the Dischargers submitted a Focused Feasibility Study in compliance with Directive 4 of CAO 98-58 and the new deadline set in Addendum No. 3.
18. On April 8, 2002, the Regional Board (Peter Peuron) reviewed and commented on the December 2001 Groundwater Monitoring Report, Former Hebdon Electronics Facility. Based upon high levels of 1,1,1-TCA contamination reported in MW-1B and MW-28, the Regional Board added the contaminant 1,4-dioxane to the sampling plan, and requested that the Discharger propose corrective measures to address the high VOC levels in groundwater. The CAO was not amended at that time.
19. On August 28, 2002, the Dischargers submitted their Final: June 2002 Groundwater Monitoring Report for the Meyers/Opper Site, Escondido California. The maximum value for 1,4-dioxane was found in MW-10 at 5,600 ug/L while the

maximum for 1,1,1-TCA occurred in MW-28 at 30,000 ug/L . Natural attenuation parameters were analyzed but MNA was determined to be infeasible as a remedial alternative. A pilot study for Enhanced Anaerobic Biodegradation (EAB) was recommended. (Appendix D-1).

20. On June 30, 2003, the Dischargers submitted a Groundwater Remedial Action Plan for the Former Hebdon Electronics Facility to address groundwater impacts from VOCs including TCE, 1,1,1-TCA and 1,4-dioxane. The Regional Board concurred with this limited pump and treat system for four wells in the source zone in a staff letter dated July 9, 2003.
21. On January 18, 2006, the Dischargers submitted a Technical Memorandum to Evaluate Alternative Groundwater Remediation Technologies as the pump and treat system was found to have extracted only 0.22 lbs of total VOCs after operating for 18 months. A pilot study was proposed to test the effectiveness of chemical oxidation for mass destruction, using persulfate injected into downgradient well MW-9 and off-site well MW-25.
22. On April 27, 2006, Notice of Violation No. R9-2006-0060 was issued for failure to file reports electronically in accordance to section 13195, Chapter 3 of the Porter-Cologne Water Quality Control act. The Dischargers outlined steps taken to correct this omission in a response letter to the Regional Board dated June 19, 2006.
23. On February 2, 2007, the Dischargers submitted *Final: 3rd Q 2006 Groundwater Monitoring and Remedial Progress Report, Meyers-Opper Site, Escondido, CA*. This report presented results from the pilot test conducted August 16 and 18, 2006 and requested deletion of the first quarter 2007 GW monitoring program based on relative plume stability.
24. In 2007, the Dischargers submitted three quarterly groundwater (GW) monitoring reports. They further requested reducing the GW monitoring program from quarterly to semi-annually.
25. On November 8, 2007, the Dischargers submitted a letter entitled: *Proposal and Workplan for In-Situ Treatment—Phase 2 Program, Former Hebdon/Meyers Opper Site in Escondido, California*.
26. On March 10, 2008, the Dischargers submitted: *Workplan for In-Situ Groundwater Sampling to delineate the downgradient plume extent of 1,4-dioxane and VOCs the upper zone*. This included plans for new well installation off-site. The Regional Board concurred with this Workplan in a reply letter dated March 26, 2008.
27. On July 2, 2008, the Regional Board sent a letter to the property owner at 2250 Micro Place requesting access to the Mesa Power Systems property for the

purpose of off-site plume investigation. The owner gave his consent in a reply letter dated July 31, 2008.

28. Data from the Hebdon on-site GW monitoring program was not collected in 2008 pending implementation of the March 2008 downgradient workplan.
29. On March 3, 2009, the Dischargers submitted a report entitled *Downgradient Plume Characterization Activities, Former Hebdon/Meyers Oppen site in Escondido*. The report described 1,4-dioxane detections in two shallow zone off-site wells above the CDPH health-based notification level of 3.0 ug/L. (No MCL exists for 1,4-dioxane.)
30. On May 22, 2009, the Dischargers submitted a report entitled *Proposed In-Situ Chemical Oxidation (ISCO) Phase 2 Treatment Program, Former Hebdon/Meyers Oppen Site in Escondido, California*. They proposed revising the Phase 2 injection program by reducing the coverage to 6 wells from an earlier plan (2007) for 17 wells.
31. On July 16, 2009, the Regional Board sent a comment letter to the Dischargers requesting additional technical information and clarification of their March 3, 2009 downgradient characterization results. A response within 30 days was required.
32. On August 10, 2009, the Dischargers submitted a response entitled: *Subject: Regional Board July 16, 2009 Letter Regarding the Report of "Downgradient Plume Characterization Activities—Former Hebdon/Meyers Oppen Site in Escondido*.
33. On October 13, 2009, the Regional Board responded to the May 22, 2009 Phase 2 proposal in a letter entitled: *Comments on Proposed In-Situ Chemical Oxidation (ISCO) Phase 2 Treatment Program*. This letter directed the Dischargers to implement the Phase 2 plan as an interim remedial action (IRA), and also required a Feasibility Study to be submitted after 60 days past completion of the verification monitoring for the IRA.