



San Diego Regional Water Quality Control Board

November 7, 2017

In reply refer to / attn:
T10000002362:Bmcdaniel

Mr. A. Martin Morgenstern
MV Universal, LLC
2100 Main Street, Suite 240
Irvine, CA 92614

Mr. Terry Etter
Unisys Corporation
3199 Pilot Knob Road
Eagan, MN 55121

Subject: Addendum No. 1 to Cleanup and Abatement Order No. R9-2011-0029, An Order Directing MV Universal LLC and Unisys Corporation to Cleanup and Abate the Effects of Pollution and Submit Technical Reports Pertaining to Corrective Actions at the Former Unisys Facility, 25725 Jeronimo Road, Mission Viejo, California (Site ID #2090041)

Messrs. Morgenstern and Etter:

Enclosed is a copy of Addendum No. 1 to Cleanup and Abatement Order No. R9-2011-0029, An Order Directing MV Universal LLC and Unisys Corporation to Cleanup and Abate the Effects of Pollution and Submit Technical Reports Pertaining to Corrective Actions at the Former Unisys Facility, 25725 Jeronimo Road, Mission Viejo, California. The compliance dates for reports required by this Addendum are **July 30th** of each year.

In the subject line of any response, please include the reference number **T10000002362:bmcdaniel**. For questions or comments, please contact Brian McDaniel at (619) 521-5897 or by email at Brian.McDaniel@waterboards.ca.gov.

Respectfully,

Julie Chan, PG
Supervising Engineering Geologist
Groundwater Protection Branch

JAC:jpa:bkm

cc: Mr. Andy Simons, asimons@geosyntec.com

Tech Staff Info & Use	
Geotracker ID	T10000002362
Cost Recovery ID	2090041

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

ADDENDUM NO. 1 TO CLEANUP AND ABATEMENT ORDER NO. R9-2011-0029

**AN ORDER DIRECTING MV UNIVERSAL LLC AND UNISYS CORPORATION TO
CLEANUP AND ABATE THE EFFECTS OF POLLUTION, AND SUBMIT
TECHNICAL REPORTS PERTAINING TO CORRECTIVE ACTIONS AT
THE FORMER UNISYS FACILITY, 25725 JERONIMO ROAD,
MISSION VIEJO, CALIFORNIA**

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

1. Except as contradicted or superseded by the findings and directives set forth in this Addendum No. 1 to Cleanup and Abatement Order No. R9-2011-0029 (CAO), all of the previous findings and directives of the CAO remain in full force and effect.
2. On, May 15, 2017, Geosyntec Consultants on behalf of MV Universal LLC and the Unisys Corporation (collectively referred to as the Discharger) requested that the San Diego Water Board modify groundwater monitoring requirements in CAO No. R9-2011-0029 to reduce sampling frequency and the number of wells in the monitoring network at the former Unisys facility. Groundwater monitoring data collected since 2011 have shown that groundwater elevations, gradient and flow direction have been consistent over the data collection period. Sample data collected to date indicate that dissolved VOC concentrations in groundwater are contained on Site, primarily located under the footprint of the existing building, and vertically limited to the uppermost water bearing units.
3. With the changes proposed by the Discharger, the revised groundwater monitoring program will continue to adequately evaluate the hydraulic containment effectiveness at the Site, monitor post In-Situ Chemical Oxidation injection conditions, assess progress towards groundwater cleanup goals, and reduce overall costs for the Discharger.
4. Addendum No. 1 revises Directives E (Groundwater Monitoring Program), G (Document Submittals), and I (Violation Reports).
5. The issuance of this addendum is an enforcement action taken by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), chapter 3, title 14 of the California Code of Regulations. This action is also exempt from the provisions of CEQA pursuant to section 15061(b)(3), chapter 3, title 14 because it can be seen with certainty that there is no possibility the activities undertaken to comply with this Order will have a significant effect on the environment.

6. The San Diego Water Board has notified the Discharger and all known interested parties of the intent to modify CAO No. R9-2011-0029.

IT IS HEREBY ORDERED, that pursuant to Water Code sections 13267 and 13304, CAO No. R9-2011-0029 is amended as follows:

1. **Directive E.1 is revised as follows:**

Monitoring: The Dischargers must measure groundwater elevations in the selected monitoring wells listed in Table 1. Groundwater samples shall be collected from monitoring wells according to the sampling frequency in Table 1, and shall be analyzed for the corresponding constituents indicated in Table 1. The sampling frequency and the constituents to be analyzed for each monitoring well are specified with an "X" in Table 1. ~~The Dischargers must measure groundwater elevations quarterly in all monitoring wells. Groundwater samples collected from all current groundwater monitoring wells shall be collected and analyzed on a quarterly basis using U.S. Environmental Protection Agency (USEPA) method 8260b for the full scan of volatile organic compounds and on an annual basis for the CAM-17 Metals using USEPA methods 6010, 6020, and 7470.~~

~~The Dischargers must sample any new groundwater monitoring wells quarterly and analyze groundwater samples for all volatile organic compounds quarterly and metals annually.~~

The San Diego Water Board may consider changing the groundwater monitoring requirements based on data submitted, delineation of the groundwater plume, remediation methods, rebound effect, and numerous other conditions that can arise during mitigation and remediation of the groundwater pollution. The Dischargers may provide a written proposal to change the sampling requirements in this Order. The Dischargers shall not implement proposed changes to groundwater monitoring requirements without San Diego Water Board approval.

**Table 1. Groundwater Monitoring Requirements for the Former
Unisys Facility - Mission Viejo, CA**

Well ID	Parameters					
	Sampling Frequency		Field Parameters	Volatile Organic Compounds by EPA 8260B	Hexavalent Chromium by EPA 7196	Water Level Only
	Annual	Biennial				
MW-16RA	X		X	X	X	
MW-16RB	X		X	X	X	
MW-29RA	X		X	X	X	
MW-29RB	X		X	X	X	
MW-30RA	X		X	X	X	
MW-30RB	X		X	X	X	
MW-31RA	X		X	X		
MW-31RB	X		X	X		
MW-35A	X		X	X		
MW-35B	X		X	X		
MW-36A	X		X	X		
MW-36B	X		X	X		
MW-37A ²	X					X
MW-37B ²	X					X
MW-38A	X		X	X		
MW-38B	X		X	X		
MW-39A	X		X	X		
MW-39B	X		X	X		
MW-41A	X		X	X	X	
MW-41B	X		X	X	X	
MW-52A ²	X					X
MW-52B ²	X					X
MW-53A ¹		X	X	X		
MW-53B ¹		X	X	X		
MW-56A ¹		X	X	X		
MW-56B ¹		X	X	X		

Notes:

1 - Proposed for Biennial Monitoring Only. The purpose of monitoring these wells biennially is to confirm plume geometry.

2 - Proposed for Water Level Only. Sample for analysis of VOCs only if concentrations increase in nearby wells or groundwater gradient shifts.

2. Directive E.2 is revised as follows:

Groundwater Monitoring Reports: The Dischargers must submit groundwater monitoring reports annually ~~quarterly~~. Annual ~~The quarterly~~ groundwater monitoring reports must be received by the San Diego Water Board ~~shall commence with the third calendar quarter, due by no later than 5:00 p.m. on July 30th of each year, 2014.~~

Subsequent reports must be received by the San Diego Water Board no later than 30 days following the end of the monitoring period according to the following schedule:

Monitoring Period	Report Due Dates
First Quarter (Jan-Mar)	Due no later than 5 p.m., April 30
Second Quarter (Apr-Jun)	Due no later than 5 p.m., July 30
Third Quarter (July-Sept)	Due no later than 5 p.m., Oct 30
Fourth Quarter (Oct-Dec)	Due no later than 5 p.m., January 30

The San Diego Water Board may consider changing the groundwater monitoring requirements based on data submitted, delineation of the groundwater plume, remediation methods, rebound effect, and numerous other conditions that can arise during mitigation and remediation of the groundwater pollution. The Dischargers shall not implement proposed changes to the monitoring frequency without San Diego Water Board approval.

The groundwater monitoring reports must include the following minimum information:

- a. Transmittal Letter with Penalty of Perjury Statement. The transmittal letter must discuss any violations during the reporting period and actions taken or planned to correct the problem. The letter must be signed by the Discharger's principal executive officer or their duly authorized representative, and must include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.
- b. Groundwater Elevations. Groundwater elevation data must be presented in tabular format with: depth to groundwater (in feet below ground surface), top of casing elevations, depths to the top of well screens, length of well screens and total depth for each well included in the monitoring program. A groundwater elevation map must be prepared for each monitored water bearing zone with the groundwater flow direction and calculated hydrologic gradients(s) clearly indicated in the figures(s). A complete tabulation of historical groundwater elevations must be included in the fourth quarterly report each year.
- c. Reporting Groundwater Results. All monitoring reports must:
 - i. Present all groundwater sampling data in tabular format. Isoconcentration map(s) must be prepared for constituents of concern (COCs) for each monitored water-bearing zone, as appropriate. Time versus concentration plots and distance versus concentration plots that also show groundwater elevations must be prepared for all constituents of concern at appropriate wells.
 - ii. Provide a Site plot plan which clearly illustrates the locations of monitoring wells, the former location(s) of industrial processes and equipment, former locations of liquid storage and conveyance systems, and buildings located on the property and immediately adjacent to the property lines of the facility.

- iii. Provide a Site plot plan with the most recent concentrations of chemicals of concern.
 - iv. Provide a text discussion and technical interpretations of the groundwater data, and describe any significant increases in pollutant concentrations since the last report, any measures proposed to address the increases, any changes to the site conceptual model, and any conclusions and recommendations for future action with each report.
 - v. Describe analytical methods used, detection limits obtained for each reported constituent, and a summary of Quality Assurance/Quality Control (QA/QC) data.
 - vi. Describe sample collection protocol(s), how investigation derived wastes are managed at the facility, and include documentation of proper disposal of contaminated well purge water and/or soil cuttings removed from the facility.
 - vii. List historical groundwater sampling results in tabular form and include them in the fourth-quarterly report each year.
- d. Remediation. If applicable, the report must include an estimate of the mass of contaminant(s) removed via soil vapor or groundwater extraction results, reported in a tabular format, for each extraction well and for the Site as a whole. The report must also include contaminant removal results, from all extraction wells and from other cleanup and abatement systems (e.g. skimmers), expressed in units of chemical mass per day and total mass removed during the reporting period. A tabulation of historical annual contaminant mass removal results must be included in the ~~second semiannual~~ report each year.
- e. Status Report. Each quarterly report must describe relevant work completed during the reporting period (e.g. Site investigation, interim remedial measures) and a description of work planned for the following monitoring period.

3. Directive G is replaced with the following text:

DOCUMENT SUBMITTALS: All documents prepared in compliance with the CAO shall be submitted to the San Diego Water Board via the Geotracker database. The Board may also request hard copies and/or electronic copies on a CD or other appropriate media, including electronic mail (email).

1. **Geotracker Database.** The Dischargers shall submit all documents electronically to the Geotracker database located at:

<https://geotracker.waterboards.ca.gov/esi>

The Electronic Reporting Regulations require electronic submission of any report or data required by a regulatory agency from a cleanup site after July 1, 2005.¹ The electronic data shall be uploaded on or prior to the regulatory due dates set forth in the Order or addenda thereto. Upon receipt of the documents, the San Diego Water Board shall use the email date and time to determine compliance with the regulatory due dates specified in this Order. Note the following regarding email document submittals:

- a. Addressee. All documents shall include the following addressee information on the cover letter and/or document title page unless otherwise directed by the Executive Officer:

Executive Officer
California Regional Water Quality Control Board, San Diego Region
2375 Northside Drive, Suite 100
San Diego, California 92108-2700
Attn: Site Restoration Unit

- b. Geotracker Global ID. All documents submitted to the San Diego Water Board shall include the following Geotracker Global ID in the header or subject line:
T10000002362.
- c. Document Size. Documents larger than 400 megabytes (MB) shall be divided into separate files at logical places in the report to keep the file sizes under 400 MB.

To comply with these requirements, the Dischargers shall upload all documents, including the following minimum information, to the Geotracker database:

- d. Laboratory Analytical Data. Analytical data (including geochemical data) for all soil, groundwater, soil vapor, and indoor air samples in Electronic Deliverable Format (EDF).
- e. Locational Data. The latitude and longitude of all permanent sampling locations for which data are reported in EDF.
- f. Site Map. The site map shall be a stand-alone document and can be submitted in various electronic formats. An updated site map may be uploaded at any time.

¹ California Code of Regulations title 23, chapter 30, division 3 and title 27, division 3

2. **Hard Copies and CDs.** If requested by the San Diego Water Board, the Dischargers shall also provide any or all of the following to the Board: a hard copy of the complete document, a hard copy of the cover/transmittal letter, a hard copy of oversized drawings or maps, and an electronic copy (on a CD or other appropriate media) of the complete document.
3. **Electronic Mail.** If requested by the San Diego Water Board, the Dischargers shall also submit a complete copy (in a text-searchable PDF file) of all documents including signed transmittal letters, professional certifications, and all data presented in the documents to:

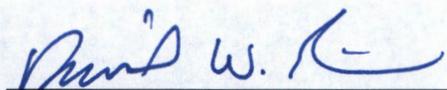
sandiego@waterboards.ca.gov

Upon receipt of the documents, the Board shall use the email date and time to determine compliance with the regulatory due dates specified in this Order.

4. Directive I is revised as follows:

VIOLATION REPORTS: If the Dischargers violate any requirement of this Order, then the Dischargers must notify the San Diego Water Board office by telephone and fax (FAX 858-574-6972) as soon as practicable once the Dischargers have knowledge of the violation. The San Diego Water Board may, depending on violation severity, require the Dischargers to submit a separate technical report on the violation within five working days of telephone notification.

Ordered by:



DAVID W. GIBSON
Executive Officer