



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

Date: April 13, 2009
File No. 43S0974 (MS)

Smiths Group Americas, LLC
Attn: Loren Bowe (loren.bowe@smiths.com)
Valley Brook Corporate Center
101 Lindenwood Drive, Suite 125
Malvern, PA 19355

SUBJECT: Tentative Order for Rescission of Site Cleanup Requirements (Order No. 89-029)
for Icore International, Inc., 170 and 180 North Wolfe Road, Sunnyvale, Santa
Clara County

Dear Mr. Bowe:

Attached please find the Tentative Order for rescission of Site Cleanup Requirements Order No. 89-029 (Order) for the subject property.

This matter will be considered for adoption at the Regional Water Board's monthly public meeting on June 10, 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 **May 14, 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

Icore International, Inc.
170 and 180 North Wolfe Road
Sunnyvale, CA 94086

Via E-mail:

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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. 89-029) FOR:

ICORE INTERNATIONAL, INC.

for the property located at

170 AND 180 NORTH WOLFE 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, 1989 (Order No. 89-029). Icore International, Inc., (Icore) was a subsidiary of Smiths Group Services Corporation (Smiths) until January 5, 2004, when Smiths sold Icore to Zodiac SA. On December 8, 2005, Icore and Smiths jointly requested the Regional Water Board to designate Smiths as the new discharger responsible for cleanup of soil and groundwater at the subject site. The Regional Water Board accepted the joint request in a letter dated December 14, 2005.
2. **Summary of Investigation and Remediation Activities:** The building at 180 North Wolfe Road was constructed in 1971 and was used by Icore to manufacture electrical harness assemblies from 1971 to 1991. The building at 170 North Wolfe Road was constructed in 1975. Icore took over the building at 170 North Wolfe Road in 1980 and operated there until 1991.

Icore used chlorinated volatile organic compounds (VOCs) during the manufacturing processes at this site and stored VOCs in two 550-gallon underground storage tanks (USTs). Icore initiated soil and groundwater investigations in 1987. Soil and groundwater contamination was identified at the site, consisting of VOCs such as trichloroethene (TCE) and tetrachloroethene (PCE). Icore and Smiths have been sampling six groundwater monitoring wells to monitor the VOC plume beneath the site. The current maximum concentrations of TCE and PCE in groundwater are 99 micrograms per liter (µg/L) and 33 µg/L, respectively. VOC groundwater plumes originating from other nearby sites have also commingled with the VOC plume at this site and extend north of the Central Expressway.

The two 550-gallon USTs were removed from the site in 1987. Icore operated a soil vapor extraction (SVE) system from 1991 through 1997 at the site. During installation of the SVE system, 50 cubic yards of VOC-impacted soil was excavated and removed. The VOC concentrations in soil vapor gradually decreased and stabilized in 1997 when asymptotic concentrations were reached. The SVE system removed approximately 530 pounds of VOCs. The SVE system including four SVE wells and eleven air induction wells was decommissioned in 2001.

In 2002, Icore implemented enhanced biological treatment (EBT) at the site. EBT involves injecting a carbohydrate solution into the subsurface as a food source for natural microbes that live in the soil and groundwater beneath the site. These microbes break down the VOCs into carbon dioxide, water and salt.

Based on currently available information, some of the remaining groundwater pollution beneath the site is most likely the result of offsite, up-gradient releases of VOCs. The Former Royal Auto Body located at 150 North Wolfe Road is an up-gradient source. The Regional Water Board has required investigation and remediation of the Former Royal Auto Body site in Order No. 89-060. Other potential up-gradient sources are C & G Tools located at 165 San Lazaro Avenue and Radiation Detection located at 162 North Wolfe Road.

3. **Basis for Rescission:** Rescission of Order No. 89-029 is appropriate for the following reasons:

- Contaminant sources have been identified and fully evaluated. Two 550-gallon USTs were the onsite source of VOC pollution.
- The site has been adequately characterized. Six monitoring wells were installed and monitored for VOCs for over ten years. Over four dozen soil samples were collected and tested for VOCs. Subsurface investigation results indicate that the shallow water-bearing zone beneath the site is impacted. The site monitoring wells are 20 to 30 feet deep.
- 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. The two USTs and the impacted soil surrounding the USTs were excavated and removed. SVE and EBT were implemented to treat the VOCs in soil and groundwater beneath the site. Soil cleanup was verified by post-remediation soil

sampling results in March 2001 (see May 25, 2001, Soil and Groundwater Quality Investigation Report).

- The groundwater plume is stable to retreating. TCE and PCE concentrations in shallow groundwater have gradually decreased. Current maximum concentrations of TEC and PCE in onsite groundwater monitoring wells are 99 ug/L and 33 ug/L, respectively. Natural attenuation is expected to reduce TCE and PCE concentrations in shallow groundwater to below drinking water standards before the groundwater will be used as a source of drinking water. Cleanup standards will be met within a reasonable timeframe.
 - 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 (ESLs) 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 this case is closed by the Regional Water Board.
 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. 89-029 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 September 30, 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

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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

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