

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 88-082

SITE CLEANUP REQUIREMENTS AND RESCISSION OF  
ORDER NO. 85-64 FOR:

MEMOREX CORPORATION  
1200 MEMOREX DRIVE FACILITY  
CITY OF SANTA CLARA  
SANTA CLARA COUNTY

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

1. Memorex Corporation, hereinafter called the discharger, owns and operates a computer tape manufacturing facility on a 10 acre site in the City of Santa Clara, Santa Clara County located at 1200 Memorex Drive, which is approximately 3 miles west of the intersection of Route 880 and Highway 101.
2. The discharger operates a solvent storage and distribution system which includes underground tanks used to store the following chemical compounds: methyl ethyl ketone, xylenes, cyclohexanone, isopropanol, acetone, and diesel fuel.
3. Subsurface investigations initiated in August 1982 detected organic solvents, including methyl ethyl ketone, xylenes, and cyclohexanone, in both soils and groundwater in the vicinity of the tank farm. This contamination appears to be the result of spillage, inadequate chemical handling practices, overflows, and/or leakage from tanks or piping.
4. As of December 1987, discharger monitoring data indicated that the solvent contamination extended vertically to a sand and gravel aquifer at a depth of approximately 30 feet and horizontally a distance of about 550 feet downgradient from the tank farm area. Methyl ethyl ketone has been detected at concentrations of 2000 parts per billion (ppb), and cyclohexanone has been detected at concentrations of 4070 ppb in groundwater samples.
5. Remedial actions to date include the installation of a groundwater extraction and treatment system to contain and cleanup the groundwater pollution.
6. The Board adopted a revised Water Quality Control Plan (Basin Plan) for the San Francisco Bay Region on December 17, 1986. The Basin Plan contains water quality objectives and beneficial uses for South San Francisco Bay and contiguous surface and groundwaters.
7. The existing and potential beneficial uses of the groundwater underlying and adjacent to the facility include:

- a. Municipal and Domestic Water Supply
  - b. Agricultural Water Supply
  - c. Industrial Service Water Supply
  - d. Industrial Process Water Supply
8. The discharger has caused or permitted, and threatens to cause or permit waste to be discharged or deposited where it is or probably will be discharged to waters of the State and creates or threatens to create a condition of pollution or nuisance.
  9. This action is an order to enforce the laws and regulations administered by the Board. This action is categorically exempt from the provisions of the CEQA pursuant to Section 15321 of the Resources Agency Guidelines.
  10. The Board has notified the discharger and interested agencies and persons of its intent under California Water Code Section 13304 to prescribe Site Cleanup Requirements for the discharge and has provided them with the opportunity to submit their written views and recommendations.
  11. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 and 13267 of the California Water Code, that the discharger shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous materials in a manner which will degrade water quality or adversely affect the beneficial uses of the waters of the State is prohibited.
2. Further significant migration of pollutants through subsurface transport to waters of the State is prohibited.
3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of pollutants are prohibited.

B. SPECIFICATIONS

1. The storage, handling, treatment or disposal of polluted soil or groundwater shall not create a nuisance as defined in Section 13050(m) of the California water Code.
2. The discharger shall conduct monitoring activities as needed to define the current local hydrogeological conditions, and the lateral and vertical extent of soil and groundwater pollution. Should monitoring results show evidence of plume migration, additional plume characterization may be required.

C. PROVISIONS

1. The discharger shall submit to the Board technical reports on self-monitoring work performed according to a program prescribed by or amended by the Board's Executive Officer.
2. The discharger shall comply with Prohibitions A.1, A.2, and A.3, and Specifications B.1 and B.2 in accordance with the following time schedule and tasks.

a. **COMPLETION DATE:** September 1, 1988

**TASK: REMEDIATION OF SOURCES AND POLLUTED SOILS**

Submit a technical report acceptable to the Executive Officer containing a proposal for removal of, or other remediation method, for the sources and polluted soils.

b. **COMPLETION DATE:** December 1, 1989

**TASK: COMPLETION OF SOURCE AND POLLUTED SOIL REMEDIATION**

Submit a technical report acceptable to the Executive Officer documenting completion of the necessary tasks identified in the technical report submitted for Provision C.2.a.

c. **COMPLETION DATE:** February 1, 1990

**TASK: PROPOSED FINAL GROUNDWATER CLEANUP OBJECTIVES**

Submit a technical report acceptable to the Executive Officer containing the results of the remedial investigation; an evaluation of the installed interim remedial measures; a feasibility study evaluating alternative final remedial measures necessary to achieve final groundwater cleanup objectives; and the tasks and time schedule necessary to implement the recommended final remedial measures.

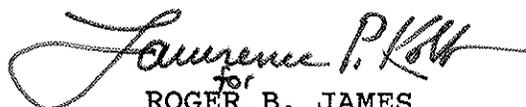
3. The submittal of technical reports evaluating final groundwater remedial measures will include a projection of the cost, effectiveness, benefits, and impact on public health, welfare, and environment of each alternative measure. The remedial investigation and feasibility study shall consider the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300); Section 25356.1 (c) of the California Health and Safety Code; CERCLA guidance documents with reference to Remedial Investigation, Feasibility Studies, and Removal Actions; and the State Water Resource Control Board's Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California."

4. Quarterly technical monitoring reports on compliance with the Prohibitions, Specifications and Provisions of this Order shall be submitted to the Board commencing on August 30, 1988. These reports shall evaluate the adequacy of plume containment measures to prevent further significant migration of pollutants and to achieve the removal of pollutants from the groundwater to meet cleanup objectives. Such evaluations shall include an estimation of the capture zones of extraction wells, verification of the cones of depression by field measurements, and presentation of chemical monitoring data from monitoring wells. Specific corrective measures shall be proposed in the event of non-compliance with plume containment and cleanup objectives.
  5. If the discharger is delayed, interrupted or prevented from meeting one or more of the completion dates specified in this Order, the discharger shall promptly notify the Executive Officer and the Board may consider revision to this Order.
  6. All hydrogeologic plans, specifications, reports, and documents shall be signed by or stamped with the seal of a registered geologist, engineering geologist or professional engineer.
  7. All samples shall be analyzed by State certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control records for Board review.
  8. The discharger shall maintain in good working order, and operate as efficiently as possible, any facility or control system installed to achieve compliance with the requirements of this Order.
  9. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order shall be provided to the following agencies:
    - a. Santa Clara Valley Water District
    - b. Santa Clara County Health Department
    - c. City of Santa Clara
    - d. State Department of Health Services/TSCD
- The Executive Officer may additionally require copies of correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order to be provided to the U.S. Environmental Protection Agency, Region IX, and to a local repository for public use.
10. The discharger shall permit the Board or its authorized

representative, in accordance with Section 13267(c) of the California Water Code:

- a. Entry upon the premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
  - b. Access to copy any records required to be kept under the terms and conditions of this Order.
  - c. Inspection of any monitoring equipment or methodology implemented in response to this Order.
  - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the discharger.
11. The discharger shall file a report on any changes in site occupancy and ownership associated with the facility described in this Order.
  12. If any hazardous substance is discharged in or on any waters of the State, or discharged and deposited where it is, or probably will be discharged in or on any waters of the State, the discharger shall report such discharge to this Regional Board, at (415) 464-1225 on weekdays during office hours from 8 a.m. to 5 p.m., and to the Office of Emergency Services at (800) 852-7550 during non-business hours. A written report shall be filed with the Regional Board within 5 working days and shall contain information relative to: the nature of waste or pollutant, quantity involved, duration of incident, cause of spill, Spill Prevention, Control, and Countermeasure Plan (SPCC) in effect, if any, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and persons/agencies notified.
  13. Order No. 85-64 is hereby rescinded.
  14. The Board will review this Order periodically and may revise the requirements when necessary.

I, Roger B. James, 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 May 18, 1988.

  
for  
ROGER B. JAMES  
EXECUTIVE OFFICER