

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

ADDENDUM NO. 2 TO ORDER NO. R9-2016-0069

**AN ADDENDUM TO ADD DIRECTIVE NO. 12 TO ORDER NO. R9-2016-0069, STYLE CLEANERS,
9640 MISSION GORGE ROAD, SANTEE, CALIFORNIA**

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

1. **INVESTIGATIVE ORDER NO. R9-2016-0069.** Except as contradicted or superseded by the findings and directives set forth in this Addendum No. 2 to Investigative Order No. R9-2016-0069 (Order), all of the previous findings and directives of the Order and Addendum No. 1 remain in full force and effect.
2. **ADDITIONAL DATA COLLECTION IN SUPPORT OF VAPOR INTRUSION INVESTIGATION.** Directive No. 1 of the Order required the Dischargers to submit a Soil Vapor Sampling Report of Results describing and interpreting the results of implementation of the Revised Soil Vapor Sampling Work Plan by June 27, 2016. In a meeting on April 14, 2016, the San Diego Water Board and the Dischargers agreed that indoor air samples should be collected to provide additional information on vapor intrusion risk. The Dischargers submitted a Soil Gas and Indoor Air Sampling Report on May 31, 2016, in fulfillment of Directive No. 1. The San Diego Water Board provided comments on this report on July 19, 2016, one of which was a requirement to collect a second set of indoor air samples in the winter in accordance with Department of Toxic Substances Control (DTSC) guidance. The DTSC Vapor Intrusion Guidance¹ recommends that if subsurface data indicate an unacceptable human health risk then indoor air samples should be collected at least twice to evaluate seasonal variability of vapor migration, indoor air concentrations, and resulting exposure before making a final risk determination. The Dischargers agreed to the second round of indoor air sampling in an email dated September 9, 2016.
3. **CALIFORNIA ENVIRONMENTAL COMPLIANCE ACT.** 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 pursuant to section 15321(a)(2), chapter 3, title 14 of the California Code of Regulations.

IT IS HEREBY ORDERED that, pursuant to Water Code sections 13267 and 13304, Order No. R9-2016-0069 is amended as follows:

1. Directive No. 12, consisting of the following, is added:
 12. **INDOOR AIR SAMPLING.**
 - a. **Indoor Air Data Collection.**

¹ DTSC. 2011. Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance). October.

- i. Conduct a building survey to identify preferential migration pathways and building characteristics, among other aspects as described in the DTSC guidance. The building survey must identify the possible pathways for vapor intrusion such as foundation seams or cracks, voids, utility ports, pipes, sumps, and drain holes. The building survey results will provide information to determine where sample canisters should be placed. These locations may differ from those chosen for the May 2016 indoor air sampling event.
 - ii. Record the results of the building survey on field forms and submit these forms to the San Diego Water Board along with a map of proposed sampling locations for approval prior to mobilization.
 - iii. Notify the Board of the intention to begin field work at least one week prior to mobilization.
 - iv. Collect indoor air samples by **March 31, 2017**. During the sampling event, record on field sampling forms the following information: canister ID, flow controller ID, sample height, starting and ending vacuum readings, starting and ending sampling times, vacuum readings collected during sample collection period, and any other information pertinent to sample collection. Indoor air samples shall be collected under conservative conditions as described in the DTSC guidance. At a minimum, windows and doors of the Style Cleaners suite shall be closed while samples are being collected.
- b. **Indoor Air Sampling Report of Results.** The Dischargers shall prepare and submit an Indoor Air Sampling Report of Results (Report). The Report must be received by the San Diego Water Board for review and approval by **5:00 p.m. on April 28, 2017**. The report shall contain, at a minimum:
- i. **Summary of Previous Investigations.** The Report shall provide a summary of previous data collection efforts related to the vapor intrusion investigation, including tables of previously collected soil vapor and indoor air data.
 - ii. **Building Survey.** The Report shall include the results of the building survey.
 - iii. **Field Methodologies.** The Report shall describe the field methodologies used for indoor air sampling and any other field sampling-related activities.
 - iv. **Laboratory Analyses.** The Report shall present results of all analyses performed including laboratory analytical methods and quality assurance/quality control sample results. All sampling data shall be presented in tabular format that includes the sample location, concentration, and sampling date.
 - v. **Sample Locations and Number.** The Report shall describe the locations and number of samples collected and include a map showing sample locations.
 - vi. **Human Health Risk Assessment.** The Report shall include a screening-level human health risk assessment including descriptions of assumptions and results.
 - vii. **Conclusions and Recommendations.** The Report shall include conclusions based on the results of the indoor air sampling and risk assessment and provide

recommendations for additional work or remedial measures and a schedule for implementation, if needed.

2. Directive No. 5 is replaced with the following:

5. **COMPLIANCE DATES.** For easy reference, the compliance dates for the reports required by this Order are repeated below.

Directive	Directive Requirement	Due Date
1	Soil Vapor Sampling Report of Results	June 27, 2016
2	Groundwater Investigation Work Plan	Suspended
3	Groundwater Investigation Report of Results	Suspended
4	Semiannual Groundwater Monitoring Reports	Each June 30 and December 31
12b	Indoor Air Sampling Report of Results	April 28, 2017

An extension of due date(s) may be granted by the San Diego Water Board for good cause.

ORDERED BY

/s/
JAMES G. SMITH
Assistant Executive Officer

2 December 2016
DATE