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**San Francisco Bay Regional Water Quality Control Board**

October 6, 2016  
File Nos. 43S0051 & 43S0188 (RWP)

Hewlett Packard Company  
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Dear Mr. Paschke and Mr. Palter:

**SUBJECT:** Approval of *Additional Vapor Intrusion Assessment* and No Further Action on Vapor Intrusion for properties at 640 Page Mill Road and 601 California Avenue, Palo Alto, Santa Clara County

Dear Mr. Paschke and Mr. Palter:

This letter responds to the July 29, 2015, *Additional Vapor Intrusion Assessment* (Followup Report). As explained below, I approve the Followup Report and require no further action on vapor intrusion evaluation.

### **Background**

Our March 12, 2012, letter (Letter 1) conditionally approved the February 17, 2012, *Revised Work Plan for Indoor Air Testing* (Workplan 1a) and required a completion report. You submitted the January 13, 2014, *Addendum to the February 17, 2012 Revised Work for Indoor Air Testing* (Workplan 1b) in response to new requirements from USEPA and the Regional Water Board. Our January 23, 2014, letter approved Workplan 1b and also required a completion report. You submitted the September 19, 2014, *Indoor Air Testing and Supplemental Vapor Intrusion Assessment Report* (Report) that documented the implementation of Workplans 1a and 1b and addressed the condition of approval in Letter 1. The Report concluded that there are no current unacceptable short- or long-term health risks to residential and commercial occupants from vapor intrusion within the designated vapor intrusion evaluation area.

Our January 8, 2015, letter (Letter 2) approved the Report and required you to further evaluate those buildings where levels of chlorinated volatile organic compounds (CVOCs) might be of concern due to the presence of preferential pathways. Although previous testing results described

in the Report showed no evidence of unacceptable vapor intrusion in occupied areas, sampling results of some non-occupied areas with preferential pathways, including a floor drain in one of the sub-grade garages, showed elevated TCE levels of up to 130 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ). You submitted the January 30, 2015, *Work Plan for Additional Vapor Intrusion Assessment* (Workplan 2) in response to Letter 2, and voluntarily implemented mitigation activities to further reduce CVOC levels at the preferential pathways. Our February 15, 2015, letter (Letter 3) approved Workplan 2 and required you to submit a report documenting the completion of Workplan 2.

### **Followup Report Summary**

The Followup Report documents the results of additional residential and commercial indoor air testing in selected buildings. Residential indoor air samples were collected during warm and cold weather. Commercial indoor air samples were collected with the heating, ventilation, and air conditioning systems turned off and on. The Followup Report compares indoor air testing results with USEPA's respective long- and short-term Regional Screening Levels (RSLs) for trichloroethene (TCE) as follows:

- Residential:  $0.43 \mu\text{g}/\text{m}^3$  and  $2 \mu\text{g}/\text{m}^3$
- Commercial:  $3 \mu\text{g}/\text{m}^3$  and  $9 \mu\text{g}/\text{m}^3$

The Followup Report indicates that no TCE and tetrachloroethene were detected in the residential breathing zone and that TCE was detected in the commercial breathing zone at levels of up to  $0.22 \mu\text{g}/\text{m}^3$ . This level is below the commercial RSL by more than an order of magnitude. The Followup Report confirms the conclusions of the Report.

### **Regional Water Board Approval**

The Followup Report satisfies the requirements of Letter 3. I hereby approve it and require no further action on vapor intrusion in buildings currently present in the designated vapor intrusion evaluation area.

If you have any questions, please contact Roger Papler of my staff at (510) 622-2435 [e-mail [roger.papler@waterboards.ca.gov](mailto:roger.papler@waterboards.ca.gov)].

Sincerely,

Bruce H. Wolfe  
Executive Officer

cc: Mailing List

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