
San Francisco Bay Regional Water Quality Control Board

March 5, 2015
File No. 43S0124 (dib)

Honeywell, Inc.
Benny DeHghi
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SUBJECT: Approval of Additional Vapor Intrusion Evaluation Report, Former Synertek #1 Site, Santa Clara, Santa Clara County

Dear Mr. DeHghi:

This letter responds to the October 31, 2014, *Additional Vapor Intrusion Evaluation Report* (report) submitted by Honeywell, Inc. As explained below, I approve this report with the condition that Honeywell will submit an addendum to the report for a vapor intrusion evaluation for one offsite building.

Background

Honeywell submitted a May 31, 2013, vapor intrusion evaluation that was approved by the Regional Water Board. In a December 16, 2013, letter, the Regional Water Board required an additional vapor intrusion evaluation for the site including any offsite buildings that overlay areas of the groundwater pollutant plume exceeding 5 µg/L of trichloroethene (TCE). Honeywell submitted an April, 15, 2014, additional vapor intrusion evaluation workplan. Our June 20, 2014, letter approved the workplan and required a completion report.

Report Summary

The report presents the results of the indoor air and sub-slab vapor sampling done at the site in June and July 2014, and a vapor intrusion evaluation of the onsite building based on the sampling results. Honeywell has been unable to work out an access agreement with the owner and tenant of an offsite building identified for evaluation. Work is ongoing to reach an access agreement. When an agreement is reached and the evaluation of the offsite building is complete, Honeywell plans to submit the offsite building vapor intrusion evaluation as an addendum to the report.

Eight sub-slab soil vapor samples, eight indoor air samples, and one outdoor air background sample were collected at the site during a ten-hour period with the building HVAC system off for 36 hours prior to sampling and during the sampling period. Indoor air was also sampled using a portable sampling device before and during the ten-hour sampling period. The sample results were evaluated by comparing the results for the chemicals found in groundwater at the site to the Regional Water Board Environmental Screening Levels (ESLs) and the U.S. Environmental

Protection Agency's Regional Screening Levels (RSLs), for a commercial/industrial site. The ESLs were re-calculated based on a ten-hour workday exposure scenario to account for ten-hour work days common in the tech industry.

TCE was found in indoor air in one sample ($2.5 \mu\text{g}/\text{m}^3$ in the sample taken in the clean room) at a level slightly exceeding the commercial/industrial ESL and RSL ($2.4 \mu\text{g}/\text{m}^3$). The sample exceeding the commercial/industrial ESL was in a location where two empty bottles used to carry TCE were inadvertently left in place until discovered half-way through the sampling period. A bottle containing TCE had previously been removed prior to sampling. The TCE source was discovered when the portable monitoring device detected TCE in the area of the clean room at the Crystal Solar tenant space. The bottles were removed and a subsequent sampling with the portable device did not detect TCE. The exceedance of the commercial/industrial ESL for TCE in the ten-hour sample is attributed to this TCE source. The sub-slab sample taken near this area was non-detect for TCE (detection limit $2.6 \mu\text{g}/\text{m}^3$). This is an additional line of evidence that the TCE bottles were the source of TCE in the indoor air sample.

The report concludes vapor intrusion from VOCs in groundwater at the onsite building is not adversely affecting indoor air and that the vapor intrusion pathway is not significant under current building use or in worse case situations created by turning HVAC systems off.

Report Approval

The report does not fully comply with the requirements of the Regional Water Board's June 20, 2014, letter for a vapor intrusion evaluation report. The letter approved a workplan for a vapor intrusion evaluation of both the onsite building and the offsite building overlying the TCE plume where TCE concentrations exceed $5 \mu\text{g}/\text{L}$. A vapor intrusion evaluation of the offsite building still needs to be performed. Honeywell intends to submit the vapor intrusion evaluation for the offsite building identified as meeting this criterion as an addendum when it is completed after resolution of the access issue.

I hereby approve the report subject to the condition that Honeywell submits an addendum to the report containing a vapor intrusion evaluation for the offsite building by **November 30, 2015**.

If you have any questions, please contact David Barr of my staff at (510) 622-2313 [e-mail dbarr@waterboards.ca.gov].

Sincerely,

Bruce H. Wolfe
Executive Officer

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