



Infrastructure, environment, facilities

Attn: Ms. Lourdes Gonzales
NPDES Wastewater Division
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, California 94612
VOC General NPDES Permit No. CAG912003

Subject:

Notification of Overflow Discharge, Self Monitoring Program for the Discharge of Treated Groundwater under NPDES Permit No. CAG912003, Former Teledyne-Singer Site, CIWQS Place ID 202385, 3176 Porter Drive, Palo Alto, California

Dear Ms. Gonzales:

ARCADIS U.S., Inc. (ARCADIS) has prepared this letter to report an unintentional discharge that occurred at the Former Teledyne-Singer Site located at 3176 Porter Drive, Palo Alto, California (Site). According to the guidelines stipulated in the National Pollutant Discharge and Elimination System (NPDES) permit, ARCADIS is required to provide telephone notification to the California Regional Water Quality Control Board (RWQCB) within 24 hours of the occurrence, followed by a written report within five working days. The written report is required to provide information relative to the size and scope of the overflow event, and corrective action(s) used to return the system to normal operating condition. This overflow did not result in a discharge of the volatile organic compounds (VOCs) to the creek above discharge criteria, as detailed further below.

ARCADIS was notified about the discharge on Monday, May 17, 2010, at 9:25 a.m. by Mr. Chris Walsh of Cameron-Cole, LLC. ARCADIS shut down the groundwater extraction and treatment system (GETS) by remote control at 9:32 a.m. on May 17, within ten minutes of receiving notice of the discharge. ARCADIS left a voice-mail message for you at approximately 1:25 p.m. on May 17, and for Mr. Xavier Bryant of the California Department of Toxic Substances Control (DTSC) immediately following the message to you.

ARCADIS personnel arrived at the Site at approximately 12:20 p.m. on May 17, and noted the discharge had been coming from the MW-11D vault located on a sidewalk portion of the parking lot located at the University Club, 3277 Miranda Avenue. ARCADIS personnel identified the source of the discharge as a broken extraction

Imagine the result

ARCADIS
1900 Powell Street, 12th Floor
Emeryville
California 94608
Tel 510.652.4500
Fax 510.652.4906
www.arcadis-us.com

ENVIRONMENT

Date:
24 May 2010

Contact:
Neill Morgan-Butcher

Phone:
415.374.2744 x12

Email:
neill.morgan-butcher@arcadis-us.com

Our ref:
RC000456.0029.MD010

water conveyance pipe connection. The connection to MW-11D was replaced, and the extraction system was restarted at approximately 3:52 p.m. on May 17. ARCADIS personnel then checked the connections and confirmed that there were no leaks from the repair. The water from the vault was pumped into the GETS equalization tank.

During a conversation with Mr. Troy Lowry, the head maintenance operator for the University Club, another employee, Mr. Esquipas, noticed the discharge when he began work at 5:30 a.m. on May 15, 2010. The employee attempted to make notifications to ARCADIS, but did not have the correct information. The University Club contacted the City of Palo Alto Fire Department (Fire Department) and Able Septic Tank Service. These organizations were unable to turn off the GETS; however, the Fire Department collected a water sample from the discharge water and a soil sample from a nearby landscaped area. On May 17, 2010, Mr. Paul Johnson of the Fire Department and Ms. Denise Kato of Lockheed Martin met the ARCADIS technician at the Site. After discussing the historic VOC concentrations of the extracted water, Mr. Johnson deemed the water not a hazard and disposed of his samples. Mr. Lowry and Mr. Johnson also noted that the discharged water did flow down the parking lot driveway, but not into the storm drain (see attached report).

The extraction rate of MW-11D is approximately 3.5 gallons per minute. Assuming all of the water being pumped from well MW-11D entered the vault and then discharged to the sidewalk, we have estimated the volume of water discharged as follows. Using the first observation of the discharge as the start, the leak occurred for 52 hours and 2 minutes, or 3,122 minutes. At 3.5 gallons per minute, approximately 10,927 gallons of water would have been pumped during this time. Taking into account the well vault volume, approximately 10,650 gallons were discharged to the surface. Note that ARCADIS was on Site on May 14, 2010, and did not observe any leaks or discharges at that time.

Groundwater from MW-11D contains very low concentrations of VOCs. ARCADIS sampled MW-11D during the semiannual monitoring event on May 7, 2010. This analysis indicated concentrations of tetrachloroethene (PCE) at 0.8 micrograms per liter ($\mu\text{g/L}$), trichloroethene (TCE) at 4.2 $\mu\text{g/L}$, and chloroform at 1.1 $\mu\text{g/L}$. These concentrations are below the maximum daily effluent limitations for discharge to drinking water areas as well as other surface water areas, which is our permit condition set forth in the NPDES permit for discharge to Matadero Creek (Section A.1). ARCADIS also sampled the water in the MW-11D well vault and Matadero

Creek on May 17. The PCE and TCE concentrations in the vault sample were below their respective effluent limitations, and VOCs were not detected in the creek sample.

On Wednesday, May 19, 2010 at 11:08 p.m., ARCADIS was notified by the Mr. Lowry of the University Club that the wellhead of MW-11D was observed to be leaking within the vault. ARCADIS walked Mr. Lowry through the process to shut down the GETS system by hand, and the GETS system was shut down at 11:10 p.m. within two minutes of receiving notice of the discharge. ARCADIS left a voice-mail message for you at approximately 1:50 p.m. on May 20, and for Mr. Xavier Bryant of the DTSC immediately following the message to you. Mr. Lowry called ARCADIS when the discharge was noticed, and no groundwater is believed to have overflowed from the vault.

ARCADIS personnel arrived at the Site at approximately 11:30 a.m. on May 20 to investigate this second problem. The technician noted that the discharge was from a broken section of the conveyance pipe connection, in a different portion of the piping than had failed on Monday. The GETS system was turned back on at approximately 12:00 p.m. on May 20 although well MW-11D remained off-line until May 21 to allow the PVC glue and connections to dry and set. At 2:45 p.m. on May 21, well MW-11D was returned to service with no leaks.

ARCADIS has sent updated contact information to the University Club and Lockheed Martin to help ensure timely system shutdown in case of any future problems. ARCADIS will replace most, if not all the PVC piping in all the vaults on the University Club property in the near future. All pipes, fittings, hoses, and other GETS hardware are inspected for defects monthly, and a site walk is conducted twice a month to observe and listen to the equipment in the vaults. All questionable components noted during the inspection are replaced or repaired as necessary.

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Palo Alto Fire Department Hazardous Materials Program
250 Hamilton Avenue, Palo Alto, CA 94301 PO Box 10250 CA 94303 (650) 329-2184

FPB-8HM Rev 11/05

Page 1 of 4

Facility ID: 43-006-001845 Facility Name: UNIVERSITY CLUB Address: 3277 MIRANDA AV

Inspection type: <input type="checkbox"/> Routine ('annual') <input type="checkbox"/> Re-inspection 1 2 3 4 + <input type="checkbox"/> Invoice (check if yes) _____ <input checked="" type="checkbox"/> Other <u>RELEASE INVEST.</u>	Program: <input type="checkbox"/> HMBP <input checked="" type="checkbox"/> <u>CFC/PAMC</u> & HMR Form <input type="checkbox"/> UST <input type="checkbox"/> AST/SPCC <input type="checkbox"/> Other _____	Inspector: Online Validation <input type="checkbox"/> Owner/Operator Page Updated <input type="checkbox"/> Owner/Operator Page Resubmitted <input type="checkbox"/> Inventory Updated <input type="checkbox"/> Maps Updated <input type="checkbox"/> UST Updated <input type="checkbox"/> Facility Closed/Archive Records
Min _____ Sig _____ (HMBP/UST)		

Hazardous Materials Compliance Requirements <small>(Based on PAMC 15 & 17, California Fire Code, and California Health and Safety Code, Chapters 6.7 and 6.95)</small>		<input type="checkbox"/> No Violations Observed	Date Corrected	Initial
1 Hazardous Materials Business Plan (HMBP) & Hazardous Materials Registration Form (HMR)				
	<input type="checkbox"/> Submit New HMBP <input type="checkbox"/> Submit new HMR Online or Hard Copy (circle one) Update/Submit: <input type="checkbox"/> Business Activities Page <input type="checkbox"/> Owner/Operator Section/Certification <input type="checkbox"/> Hazardous Materials Inventory (HMIS) <input type="checkbox"/> Emergency Response Contingency Plan <input type="checkbox"/> Facility Site Plan/Storage Map <input type="checkbox"/> Recordkeeping <input type="checkbox"/> Training Plan <input type="checkbox"/> see page Other: _____			
2 Inspection Observations/Correction Requirements				
Location:	Secondary Containment: <input type="checkbox"/> Provide <input type="checkbox"/> Permit required (submit plans) <input type="checkbox"/> Repair <input type="checkbox"/> Maintain Clean & Dry <input type="checkbox"/> Monitoring <input type="checkbox"/> Documentation Other: _____ see page			
Location:	Separation of Incompatibles: <input type="checkbox"/> Remove incompatible material(s) <input type="checkbox"/> Provide separation by structure (wall/cabinet, etc) or by distance Other: _____ see page			
Location:	Monitoring UST Other Both (circle one) <input type="checkbox"/> Provide visual / continuous monitoring (circle) <input type="checkbox"/> Repair <input type="checkbox"/> Provide Maintenance Reports <input type="checkbox"/> Provide written description/equipment information Other: _____ see page			
Location:	Labeling, Placarding and Marking: <input type="checkbox"/> Label containers properly <input type="checkbox"/> Provide signs for room or area <input type="checkbox"/> Provide Placards for room or building <input type="checkbox"/> Label piping (contents & flow direction) Other: _____ see page			
Location:	Hazardous Materials Storage: <input type="checkbox"/> Reduce Quantities below H Occupancy threshold <input type="checkbox"/> Properly dispose of hazardous materials/ hazardous waste <input type="checkbox"/> Submit Plans for upgrading Hazmat Storage Area <input type="checkbox"/> Provide MSDS for specified materials (see page _____) Other: _____ see page			
Location:	Other: <input type="checkbox"/> Remove hazardous materials spillage, containers, debris. <input type="checkbox"/> Floors must be free from spillage <input type="checkbox"/> Service fire extinguishers annually <input type="checkbox"/> Discontinue use of extension cords <input type="checkbox"/> Upgrade wiring/permit required <input type="checkbox"/> Provide exit signs / emergency lighting <input type="checkbox"/> Clear exit pathway/corridor <input type="checkbox"/> Secure all gas cylinders and dewars Other: _____ see page			

Violations shall be corrected immediately and may be subject to enforcement action (PAMC 17.48). A dated and initialed copy of this report or a signed letter shall be returned to the Palo Alto Fire Department within _____ days confirming the items have been corrected. A re-inspection to verify compliance may be conducted within _____ days from the initial date of this inspection. All re-inspections after the first re-inspection shall be charged at the rate specified in the Municipal Fee Schedule.

Print name & phone # _____ Print PAUL JOHNSON
 Sign _____ Sign [Signature] 05/17/18
 Authorized Facility Representative/Owner/Operator Inspector/Rescue 2 Shift A/B/C Inspection Date

White Copy: FPB File Yellow Copy: Station File Pink Copy: Facility Contact
 - 30 DAYS - REINSPECT UPDATED CONTACT BINDER AT UNIV CLUB
 - 30 DAY - PLAN FOR LABELING GRIND WATER VAULTS.

Palo Alto Fire Department Hazardous Materials Program
 250 Hamilton Avenue, Palo Alto, CA 94301 PO Box 10250 CA 94303 (650) 329-2184

Facility ID: 43-006- 001840

Page: 2 of 4

Facility Name: University Club
 Address: 3277 Miranda Ave., Palo Alto
 Inspection Date: 05/17/2010

Contact with: Troy Lowry (University Club - (650) 493-3872 x23)
Denise Kato (Lockheed EH&S - (408) 756-9595)

Arcadis project contact: Neill Morgan-Butcher (Arcadis - 415-374-2744 x 12, cell (510) 685-2011
 Inspector: P Johnson (650) 329-2198

Hazardous Materials Investigation / Follow-up- cont'd

Item #	Comment	Assigned to / Status	Date Corrected
1)	<p>Background: PAFD inspection bureau was contacted approx 08:30 am Monday 5/17/2010 by PAFD Rescue 2 regarding a groundwater well that was leaking / overflowing into the parking lot at 3277 Miranda Ave. Rescue 2 had responded Sunday evening at approx 19:30 hours, found the monitoring well vault overflowing into the parking lot and used field test strips to determine if it had various hazardous materials characteristics. Negative on field test strips (ph, fluorides, oxidizer, hydrocarbons, etc).</p>		
2)	<p>Bureau Site Inspection: Paul Johnson (PAFD Hazardous Materials Inspector) went to the site arriving at approx 9:15 am. Upon arrival found 1 x monitoring well vault overflowing with water (approx 1 - 3 gallons per minute). The water was traveling south on the parking lot (flowing slope) to the end of the asphalt, where it enter the soil. Note: Water from this well did not enter the surface of the storm drain approx 2-3 feet away from the end of the asphalt driveway (swale and storm drain were dry - dry leaves and cob webs visible). I contacted Troy Lowry (University Club Maintenance Manager). Troy informed me he had been trying to contact someone from Arcadis since the overflow condition occurred Saturday. Troy indicated the binder regarding the site monitoring wells that the University club was given by Arcadis had phone numbers that were disconnected. Troy had just spoken to Denise Kato of Lockheed and Denise was able to provide an updated phone number for Arcadis. Troy was able to contact Jennifer Ely of Arcadis (510) 596-9506, Cell (510)409-31296. Jennifer stated she could shut down the well remotely. After about 5 minutes water ceased to flow from the vault. (Approx 9:30 - 10:00am). I requested Troy place additional traffic cones in the parking lot to prevent vehicles and pedestrians from crossing into the water. Due to the concern of impeding rain, I obtained a water grab sample and a shallow soil sample at the south end of the parking lot near where the water was entering the dirt. The water sample (Sample #1) was obtained by using a precleaned poly jar and directly scooping water from a large puddle near the end of the asphalt.</p>		

Page 4/4			
Item #		Assigned to / Status	Date Corrected
	<p>E) Corrections:</p> <p>i) <u>Arcadis to update their project binder with the University Club.</u> * Note: updated / current contact phone numbers had been already posted at the 3176 Porter Ave., ground water treatment compound)</p> <p>ii) <u>Arcadis to devise a plan/ method to label all monitoring well vaults in Palo Alto as to easily identify the site and who to contact.</u></p> <p>F) Misc.</p> <p>iii) Bill to be sent to Arcadis for PAFD Rescue 2 and inspector investigation time.</p> <p><u>Arcadis Project Engineer:</u> Neill Morgan-Butcher, PE Arcadis 100 Montgomery, Suite 300 San Francisco, CA 94104 (415) 374-2744 x 12</p> <p>-end-</p>		