



California Regional Water Quality Control Board San Diego Region



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January 23, 2009

In reply refer to:
CGWU: 20-91500:lberlad

Mr. Greg Salo
Environmental Health and Safety
Signet Armorlite, Inc.
1001 Armorlite Drive
San Marcos, CA 92069

Dear Mr. Salo:

**SUBJECT: INVESTIGATIVE ORDER NO. R9-2009-0015 FOR
SIGNET ARMORLITE INC. 130 NORTH BINGHAM DRIVE
SAN MARCOS, CA 92069**

Enclosed is Investigative Order No. R9-2009-0015 regarding unauthorized releases of chemicals to soil and groundwater at the Signet Armorlite, Inc. facility at 130 North Bingham Drive, San Marcos, San Diego County. This Order requires Signet Armorlite Inc. to submit two technical reports to address data gaps in site characterization. This Order is being issued by the California Regional Water Quality Control Board (Regional Board) pursuant to California Water Code section 13267.

The enclosed order directs Signet Armorlite Inc. to submit a comprehensive soil and groundwater investigation work plan by February 28, 2009. The order further directs Signet Armorlite Inc. to submit a comprehensive soil and groundwater investigation report with a proposed corrective action plan based upon those findings by May 30, 2009.

Any person failing to furnish information required by the Order or falsifying information submitted to the Regional Board, pursuant to California Water Code section 13267, is guilty of a misdemeanor and may be subject to civil liability. Under Water Code section 13268, a civil liability may be imposed administratively by the Regional Board in an amount of up to \$1,000 per day of violation (i.e., for each day of delay in submitting all information requested, or for each day that false information remains uncorrected.)

Any person affected by this action of the Regional Board may request an evidentiary hearing before the Regional Board as described in this Order, section H.3. A request for an evidentiary hearing does not stay the effective date of the Order. Any person

California Environmental Protection Agency

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Mr. Greg Salo
Investigative Order No. R9-2009-0015
for Signet Armorlite, Inc.

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January 23, 2009

affected by this action of the Regional Board may petition the State Water Resources Control Board (SWRCB) as described in the Order, Section H.4. A request for an evidentiary hearing does not extend the thirty day period to file a petition with the SWRCB.

Please note that beginning January 1, 2005, all reports submitted to the Regional Board by the Discharger, pursuant to sections 13304 and 13267 of the Water Code, must be submitted in electronic format. The Discharger shall comply with electronic reporting requirements of Title 23 of the California Code of Regulations, Division 3, section 3893, including the provision that complete copies of all reports be submitted in PDF format, and include the signed transmittal letter and professional certification.

The heading portion of this letter includes a Regional Board code number noted after "In reply refer to." In order to assist us in processing your correspondence please include this code number in the heading or subject portion of all correspondence and reports to the Regional Board pertaining to this matter.

If you have any questions, or require additional assistance, please contact Ms. Lynn Berlad of my staff at (858) 238-5363 or by e-mail at lberlad@waterboards.ca.gov.

Respectfully,

Julie Chan

for Michael P. McCann
Assistant Executive Officer

MPM:jac:clc:lgb

Attachment: Investigative Order R9-2009-0015

Cc: Michael A. Palmer
de maximis, inc.
1322 Scott St Suite 101, San Diego Ca 92106

California Environmental Protection Agency

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

INVESTIGATIVE ORDER NO. R9-2009-0015

An Order Directing
Signet Armorlite, Inc.
130 North Bingham Drive
San Marcos, CA 92069

To submit two technical reports for Signet Armorlite, Inc: 1) a comprehensive soil and groundwater investigation work plan, and 2) a site investigation report with a corrective action plan.

Pursuant to its authority in California Water Code section 13627, the California Regional Water Quality Control Board, San Diego Region (Regional Board) finds:

1. Releases

Detectable releases of chemicals to soils and groundwater from an optical lens manufacturing facility doing business as Signet Armorlite Inc. (hereinafter "Signet"), have been documented in multiple site assessments beginning in 1992.¹ Known chemicals or chemical degradation products released at Signet include: petroleum compounds (benzene, toluene, ethylbenzene, xylenes), 1,2,4-trimethylbenzene (1,2,4-TMB), 1,3,5-trimethylbenzene (1,3,5-TMB); volatile organic compounds (VOCs), including methylene chloride (MEK), 1,1,1-trichloroethane (1,1,1,-TCA), trichloroethylene (TCE), 1,1-DCE, 1,1-DCA, vinyl chloride, acetone, and trichlorotrifluoroethane (Freon-113); semi-volatile organic compounds (SVOCs) including 1,4-dioxane; and M-pyrol (N-methyl 2-pyrrolidone).

Maximum concentrations of select contaminants detected in groundwater at Signet prior to remedial activities are described in the table below.²

Chemical	Maximum, ug/L	Calif MCL, ug/L
Benzene	17,000	1.0
Vinyl Chloride	1,100	0.5
Freon-113	2,300	1,200
MEK	560,000	5.0
1,1,1-TCA	84,500	200
1,4-Dioxane	1,100	3.0 ³
1,1-DCE	14,800	6.0

¹ Warzyn. *Phase I Environmental Assessment (1992) and Phase II Environmental Site Assessment for Signet Armorlite Inc, San Marcos, CA (1993)*; Kleinfelder *Limited Environmental Site Assessment, Signet Armorlite Facilities (1993)*; *Environmental Site Assessment (1994)*; *Soil and Water Investigation Status Report (1996)*; *Report on Groundwater Investigation (1997)*.

² Hargis + Assoc. *Semi-Annual Groundwater Monitoring Report for Signet Armorlite (2007)*.

³ An MCL for 1,4-dioxane has not yet been established. The California Department of Health Services has set 3.0 ug/L as the notification level for 1,4-dioxane in drinking water. 1,4-dioxane is classified as a probable human carcinogen by USEPA (1997).

Releases attributable to the use or storage of chemicals and their wastes at Signet have therefore created a condition of pollution affecting beneficial uses of waters of the State.

Other chemicals used in Signet lens manufacturing processes include but are not limited to: di n-octyl phthalate (DOP), CR-39 "monomer" (diallyl diglycol carbonate). Mixed hazardous waste streams containing a percentage of DOP or CR-39 mixed with Freon-113, acetone, and other constituents have also been documented.⁴ An investigation and analysis for DOP and/or CR-39 mixtures in soil and groundwater at Signet has not yet occurred in site assessments to date. However, potential releases of these chemicals may also have created or threaten to create a condition of pollution affecting beneficial uses of waters of the State.

The "Site" for the purposes of this Order includes not only the Signet facility and the environmental media affected by the releases, but the full horizontal and vertical extent of the plume(s) of contamination discharged from the facility, according to California Water Code section 13304, and State Water Resources Control Board (SWRCB) Resolution No. 92-49. For example, analytic reports have documented a plume of Freon-113 from Signet sources that has migrated approximately 500 feet from the southern property boundary to impact groundwater under the North County Factory Outlet (NCFO) site at 1050 Los Vallecitos Blvd.⁵ No documented sources of Freon-113 have been identified at NCFO.

2. Person Responsible for the Releases

Signet Armorlite Inc.
130 North Bingham Drive
San Marcos, CA 92069

Signet Armorlite Inc. is identified as the person responsible for the chemical releases because the corporation has been the owner of the property located at 130 North Bingham Drive, San Marcos, California (APN # 219-163-48) since 1972. The mailing address for this property is: 1001 Armorlite Drive, San Marcos CA 92069. Mr. Bruno Salvadori is the current Chief Executive Officer and President of Signet Armorlite, Inc.

Signet Armorlite, Inc. is referred to as the "Discharger" in this Order.

3. History

From 1972 to the present, an optical lens manufacturing facility doing business as Signet Armorlite, Inc. has operated at 130 N. Bingham Drive in San Marcos, California on land successively owned by Signet Optical (1972-1978), 3-M Optical / Kodak (1978-1983), Jepson Corporation, (1984-89), Eagle Industries, Inc. (1989-1992), and Galileo Industries (Galileo

⁴ USEPA. *RCRA Preliminary Assessment for Signet Armorlite Inc. San Marcos, CA (1991).*

⁵ Hargis + Assoc. *Semi-Annual Groundwater Monitoring Report for Signet Armorlite (2007)*

Industrie Ottiche S.p.A.) of Venice, Italy (1993-present). The facility has over 130,000 feet of floor space and operates 24 hours a day, five days a week.

Product formulation of optical resin lenses is a complex industrial operation involving batch mixes in temperature controlled reaction vessels; cleaning and "curing" in serial dip tanks filled with methylene chloride and hot water; lens wiping with mixed chemical solutions containing a percentage of Freon-113; coating; and grinding. Lens formulation operations were conducted for 34 years at this facility until manufacturing ceased in 2006. The current business at Signet includes subcontracted lens "finishing" (resin lens shaping and coating) in clean rooms, product storage, and distribution.

4. Remedial Activities

Remedial activities at Signet were originally under San Diego County Department of Environmental Health (DEH) authority until the Regional Board took over on April 10, 1995. The following remedial activities have occurred at Signet with Regional Board regulatory oversight: source removal of a diesel above-ground storage tank (AST) and excavation of contaminated soil in 1995; multi-phase extraction for VOC removal in soils and groundwater from 1995-1998; source removal of a methylene chloride AST and gasoline UST, followed by contaminated soil removal in 2004; soil vapor analysis with an indoor air risk assessment for benzene in 2006; downgradient delineation of the 1,1-DCE plume in groundwater, including installation of two off-site wells in 2006-2007.

Data gaps identified and discussed in a series of technical letters and meetings with the Discharger in 2007-2008 provide the basis for some of the directives in this order:

- a. Hargis + Associates, November 15, 2007. "Amended Key Well Sampling Program, Signet Armorlite facility San Marcos."
- b. Hargis + Associates, December 5, 2007 letter. "Additional Soil Assessment, Boneyard area, Signet Armorlite facility, San Marcos"
- c. Regional Board, December 18, 2007 reply letter to Signet Armorlite. "Subject: Additional Soil Assessment, Boneyard Area"
- d. Regional Board, Feb. 25, 2008 reply letter. "Subject: Comments on Amended Key Well Sampling Plan dated November 15, 2007."
- e. Hargis + Associates, March 6, 2008 letter. "Schedule and Status Update, San Marcos, California."
- f. Hargis + Associates, March 14, 2008 letter. "Response to Comments."
- g. Regional Board, March 21, 2008 reply letter: "Subject: Schedule and Status Update, and Response to Regional Board Comments."
- h. Hargis + Associates, April 7, 2008 letter: "Re: Response to California Regional Water Quality Control Board Comments, Signet Armorlite site."
- i. Hargis + Associates, October 28, 2008 transmittal letter and report, "Additional Groundwater Assessment, Signet Armorlite Facility, San Marcos, California."

- j. Regional Board December 18, 2008 reply letter. "Subject: Comments on Additional Groundwater Assessment, Signet Armorlite facility, San Marcos, CA, dated October 28, 2008."
5. **Beneficial Uses:** The Site is within the Escondido Hydrologic Subarea (Basin Number 904.62), which has the following beneficial uses (BUs) of water resources designated in the Water Quality Control Plan for the San Diego Basin (Basin Plan, Tables 2-2 and 2-5):

Hydrologic Unit/Watershed	Hydrologic Subarea Basin No.	Designated Beneficial Use
Groundwater		
Carlsbad HU	Escondido HSA 904.62	Municipal supply (MUN)
		Agricultural supply (AGR)
		Industrial Service supply (IND)
Surface Water		
San Marcos Creek WS	HU 904.62	Municipal supply (MUN)
		Agricultural supply (AGR)
		Contact Water Recreation (REC1)
		Non-contact Water Recreation (REC2)
		Warm Freshwater Habitat (WARM)
		Wildlife Habitat (WILD)

6. **Condition of Pollution and/or Nuisance.** As documented in Finding 1, discharges of contaminants to soil and groundwater have caused and/or threaten to cause conditions of pollution and/or nuisance at the Site; may have adversely affected conditions in the subsurface environment; have caused or threaten to caused the groundwater at or adjacent to the Site to exceed or threaten to exceed water quality objectives (WQOs) that support the beneficial uses listed in Finding 5. Additionally, the discharges may be a violation of prohibitions in the Basin Plan, and the Porter-Cologne Water Quality Control Act (Division 7 of the Water Code), section 13260.
7. **Legal and Regulatory Authority.** This Order is based on (1) section 13267 of the Water Code; (2) all applicable provisions of statewide Water Quality Control Plans adopted by the SWRCB and the Basin Plan adopted by the Regional Board, including Beneficial Uses, WQOs, and implementation plans; (3) SWRCB policies, including SWRCB Resolution

No. 68-16 (Statement of Policy with Respect to Maintaining High Quality of Waters in California) and SWRCB Resolution No. 88-63 (Sources of Drinking Water); and (4) relevant standards, criteria, and advisories adopted by other state and federal agencies.

Water Code section 13267 provides:

"(b) (1) In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

8. Regulatory Basis and Necessity for Submittal of Technical Reports.

Pursuant to Water Code section 13267(a), the Regional Board may investigate the quality of any waters of the state within the Regional Board's boundaries. As part of the water quality investigation, Water Code section 13267(b)(1) authorizes the Regional Board to require the submittal of a technical report with the caveat that the burden of the report bear a reasonable relationship to the need and benefits to be obtained from the report.

Two technical reports are needed from Signet to provide information to the Regional Board: 1) a work plan to characterize the effects of the discharges on water quality and the environment, and 2) a site investigation report to interpret the results of the investigation and discuss the feasibility for remedial action. The benefits to be obtained from these technical reports include enabling the Regional Board to determine if additional environmental cleanup is necessary at the Site to restore water quality that supports beneficial uses, and/or if further enforcement action(s) are warranted. Based on the nature and possible consequences of the discharges (refer to Order Findings No. 1, 3, and 6 above) the burden of providing the required report bears a reasonable relationship to the need for the report and the benefits to be obtained from the reports.

9. California Environmental Quality Act (CEQA) Exemption: This Order, which enforces the laws and regulations administered by the Regional Board,

meets the CEQA (Public Resources Code section 21000, et seq.) Categorical Exemption outlined in section 15321 of CCR Title 14, the CEQA Guidelines.

- 10. Use of Licensed/Appropriately Qualified Professionals.** The Discharger shall provide documentation that the reports required under this Order are prepared under the direction of appropriately qualified professionals. California Business and Professions Code sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgments be performed by or under the direction of licensed professionals. A statement of qualifications and license numbers, if applicable, of the responsible lead professional and all professionals making significant and/or substantive contributions shall be included in the report submitted by the Discharger. The lead professional(s) shall sign and affix his/her license stamp to the report.

IT IS HEREBY ORDERED, pursuant to section 13267 of the Water Code the Discharger is required to submit a Comprehensive Soil and Groundwater Investigation Work Plan **by 5:00 pm on February 27, 2009** that complies with all of the following directives; and, a Comprehensive Soil and Groundwater Investigation Report with Corrective Action Plan **by 5:00 pm on June 30, 2009** that complies with all of the following directives.

- A. COMPREHENSIVE SOIL AND GROUNDWATER INVESTIGATION WORK PLAN:** The Discharger shall submit a Comprehensive Soil and Groundwater Investigation Work Plan (Work Plan) by 5:00 p.m. on February 27, 2009 that includes sufficient scope to determine the vertical and lateral extent of contamination and to fulfill the data requirements for a Site Investigation and Characterization Report with Corrective Action Plan as described in Directive B below. The Work Plan must include sampling for the following areas:

- 1. Boneyard Area.** The investigation in the Boneyard area must include collecting and analyzing a statistically significant number of soil and groundwater samples at all potential source locations.
- 2. Former Hazardous Waste Storage Locker Area.** The investigation in the Former Hazardous Waste Storage Locker area must include soil and groundwater sampling at a minimum of three relevant locations not previously assessed.
- 3. Current Groundwater Monitoring Wells.** The Work Plan must include sampling of 18 wells for 33 site-specific contaminants of potential concern.
- 4. Delineation of the Freon-113 plume.** The Work Plan must detail how the horizontal and vertical extent of the Freon-113 plume will be investigated. This must include sampling of both Signet groundwater monitoring wells and off-site wells south of the property boundary. This delineation may require the installation of additional groundwater monitoring wells. In addition, Signet may consider additional soil and groundwater sampling in off-site areas to determine the existence of other sources of Freon-113.

5. **Updated Site Conceptual Model (SCM).** The Work Plan must include the collection of sufficient data to address data gaps identified in the previously submitted Tech Memo (Hargis + Assoc. August 31, 2007, Attachment 7) and add data interpretations necessary to update the SCM.
6. **Schedule.** The Work Plan must include a schedule for completion of all activities and submission of a Site Investigation Report and Corrective Action Plan as described below.

B. WORK PLAN IMPLEMENTATION. The Discharger shall implement the Work Plan within 60 days after submission of the Work Plan, unless otherwise directed in writing by the Regional Board. Before beginning these activities, the Discharger shall:

1. Notify the Regional Board of the intent to initiate the proposed actions included in the work plan submitted; and
2. Comply with any conditions set by the Regional Board, including mitigation of adverse consequences from cleanup activities.

C. SITE INVESTIGATION REPORT AND CORRECTIVE ACTION PLAN. The Discharger must prepare and submit a Site Investigation Report with Corrective Action Plan (CAP) by 5:00 p.m. on June 30, 2009. The Site Investigation Report shall contain the following:

1. **Soil and Groundwater Sampling Results.** The Site Investigation Report (SIR) shall contain sampling results and interpretation for A1-A5 above that adequately characterizes the source(s), nature and extent (both laterally and vertically) of the Signet discharges and addresses any pollution that has migrated off-site. The information in the Report must provide an adequate basis for determining subsequent cleanup and abatement actions, or if more investigation is necessary, make recommendations for further site characterization activities with rationale for those actions.
2. **Corrective Action Plan.** The SIR must include a Corrective Action Plan that identifies and discusses a range of remedial action alternatives to cleanup Signet wastes, identifies the preferred alternative, and includes a schedule for implementing the preferred alternative.

D. DOCUMENTS TO BE FILED WITH THE REGIONAL BOARD

1. *By 5:00 pm on February 27, 2009, the Discharger is required to submit the Soil and Groundwater Investigation Workplan that complies with all the requirements of this Order.*
2. *By 5:00 pm on June 30, 2009, the Discharger is required to submit the Site Investigation Report with Corrective Action Plan that complies with all the requirements of this Order.*

3. **Electronic Format Reporting Requirements.** Beginning January 1, 2005, all reports submitted to the Regional Board by the Discharger, pursuant to sections 13304 and 13267 of the Water Code, were required by law to be submitted in an electronic format. The Discharger shall comply with electronic reporting requirements of Title 23 of the California Code of Regulations, Division 3, section 3893, including the provision that complete copies of all reports be submitted in text searchable EDF format, and include the signed transmittal letter and professional certification.

E. PROVISIONS

1. **No Pollution, Contamination, or Nuisance.** The storage, handling, treatment, or disposal of soil containing chemical waste or polluted groundwater must not create conditions of pollution, contamination, or nuisance as defined in Water Code section 13050(m). The Discharger must properly manage, treat, and dispose of wastes and polluted groundwater in accordance with applicable federal, state, and local regulations.
2. **Operation and Maintenance.** 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.
3. **Reporting of Changed Owner or Operator.** The Discharger must notify the Regional Board of any changes in site occupancy or ownership associated with the Site described in this Order.
4. **Contractor/Consultant Qualifications.** All reports and documents required under this Order shall be prepared under the direction of appropriately qualified professionals. The lead professional performing engineering and geologic evaluations and judgments shall sign and affix their professional geologist or civil engineering registration stamp to all technical reports, plans or documents submitted to the Regional Board.
5. **Lab Qualifications.** All samples must be analyzed by California State-certified laboratories using methods approved by the U.S. Environmental Protection Agency (USEPA) for the type of analysis to be performed. All laboratories must maintain quality assurance/quality control (QA/QC) records for Regional Board review. Any report presenting new analytical data is required to include the complete laboratory analytical report(s). The laboratory analytical report(s) must be signed by the laboratory director and contain:
 - a. A complete sample analytical report;
 - b. A complete laboratory quality assurance/quality control (QA/QC) report;

- c. A discussion of the sample and QA/QC data; and
 - d. A transmittal letter that shall indicate whether or not all the analytical work was supervised by the director of the laboratory, and contain the following statement, "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services in accordance with current USEPA procedures."
- 6. Penalty of Perjury Statement.** All reports must be signed by the Discharger's principal executive officer or their duly authorized representative, and must include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.
- 7. Regulations.** All corrective actions must be in accordance with the provisions of the California Code of Regulations Title 23, Chapter 16 and the Cleanup and Abatement Policy in the Water Quality Control Plan for the San Diego Basin (Region Nine).

F. NOTIFICATIONS

- 1. Cost Recovery.** Pursuant to Water Code section 13304(c), the Regional Board is entitled to, and may seek reimbursement for, all reasonable costs that may be incurred by the Regional Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, or other remedial action required by the Order.
- 2. Enforcement Discretion.** The Regional Board reserves its right to take any enforcement action authorized by law for violations of the terms and conditions of this Order. This Order does not limit the authority of this Regional Board to institute additional enforcement actions or to require additional investigation and cleanup consistent with the Water Code.
- 3. Enforcement Notification.** Water Code section 13268(a)(1) provides that any person failing or refusing to furnish technical or monitoring report information as required by Water Code section 13267(b), or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly for an administratively imposed liability of up to \$1,000 per day for each day compliance is not achieved with an Order issued in accordance with subdivision 13268(b).
- 4. Requesting Evidentiary Hearing by the Regional Board.** Any person affected by this action of the Regional Board may request an evidentiary hearing before the Regional Board. The Regional Board's Executive Officer may elect to hold an informal hearing or a "paper hearing" in lieu of scheduling a hearing before the Regional Board itself. If you decide to request an evidentiary hearing, send your request to the Regional Board Executive Officer, Attn: Supervisor Central San Diego County Ground

Water Unit, at the address provided on the Order transmittal letter. Please consider the following carefully:

- a. The Regional Board must receive your request within 30 days of the date of this Order.
- b. Your request must include all comments, technical analysis, documents, reports, and other evidence that you wish to submit for the evidentiary hearing. However, please note that the administrative record will include all materials the Regional Board has previously received regarding this site. You are not required to submit documents that are already in the record.
- c. The Executive Officer or Regional Board may deny your request for a hearing after reviewing the evidence.
- d. If you do not request an evidentiary hearing, the SWRCB may prevent you from submitting new evidence in support of a SWRCB petition.
- e. Your request for an evidentiary hearing, if you submit one, does not stay the effective date of the Order, whether or not a hearing is scheduled.
- f. A request for a hearing does not extend the 30-day period to file a petition with the SWRCB (see below). However, we suggest that you ask the SWRCB to hold the petition in abeyance while your request for a hearing is pending. (Refer to CCR Title 23 section 2050.5(d)) Additional information regarding the SWRCB petition process is provided below.

5. Requesting Administrative Review by the SWRCB

Any person affected by this action of the Regional Board may petition the SWRCB to review the action in accordance with section 13320 of the Water Code and CCR Title 23 section 2050. The petition must be received by the SWRCB (Office of Chief Counsel, P.O. Box 100, Sacramento, California 95812) within 30 days of the date of this Order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

I, Michael P. McCann, Assistant Executive Officer, do hereby certify the forgoing is a full, true, and correct copy of a Water Quality Investigation Order issued on January 23, 2009.

Ordered By: Julie Chan
for Michael P. McCann
Assistant Executive Officer
January 23, 2009

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 Street, Apt. No. **1001 Armorlite Drive**
 or PO Box No. **1001**
 City, State, ZIP+4 **San Marcos CA 92069**
 PS Form 3800, August 2006 See Reverse for Instructions

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1. Article Addressed to:

Mr. Greg Said
Environ mental Health and
Safety
Sigret Armorlite, inc.
1001 Armorlite Drive
San Marcos, CA 92069

2. Article Number

(Transfer from service label)

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PS Form 3811, February 2004

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