

STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING OF SEPTEMBER 7-8, 2006  
Prepared on July 25, 2006

ITEM NUMBER: 15

SUBJECT: **Status Report, Scotts Valley Dry Cleaners, 272-A Mount Herman Road, Scotts Valley, Santa Cruz County**

**KEY INFORMATION**

Type of Discharge: Unauthorized Release of Tetrachloroethene (PCE)  
Existing Orders: Cleanup or Abatement Order (CAO) No. R3-2005-0081  
Waste Discharge Requirements Order No. 01-134 National Pollutant Discharge Elimination System (NPDES) Permit No. CAG993002  
General Permit for Discharges of Highly Treated Groundwater to Surface Waters  
Monitoring and Reporting Program (MRP) No. R3-2005-0086  
MRP No. R3-2005-0082

**This Action: Status Report Only**

**DISCUSSION**

New information is shown in italics. For additional background information, please refer to the Water Board's May 13, 2005; September 9, 2005; and May 12, 2006 staff reports.

Water Board staff provides regulatory oversight of the Scotts Valley Dry Cleaners site in Santa Cruz County, one of many high priority Spills, Leaks, Investigation, and Cleanup cases in the region.

**Background**

The Dischargers started site remediation of dry cleaning solvent discharges in 1996. The Dischargers initially performed excavation (trenching) and vapor extraction in the source area. In March 1998, Water Board staff required the Dischargers to submit a corrective action plan. Since 1998, the Dischargers conducted several remediation pilot tests/interim remedial actions, including air sparging, aquifer pump testing, and injection of hydrogen releasing

compounds and cheese whey. The Dischargers revised the corrective action plan several times based on pilot test results.

The Dischargers implemented high vacuum, dual-phase extraction in March 2004 for plume containment. In July 2004, the Dischargers submitted a revised Interim Remedial Action Plan proposing installation of additional groundwater monitoring and extraction wells, and a permanent groundwater extraction and treatment system.

The Water Board permitted the treated groundwater discharge from the proposed system under the General National Pollutant Discharge Elimination System (NPDES) Permit for Discharge of Highly Treated Groundwater to Surface Waters on May 5, 2005. The pump and treat system was fully operational by August 10, 2005.

On May 25, 2005 the Water Board issued Cleanup or Abatement Order No. R3-

2005-0081 (CAO) and Monitoring and Reporting Program No. R3-2005-0082 to the responsible parties.

As part of CAO No. R3-2005-0081, the Dischargers were required to submit a work plan to install wells to further investigate the contamination off-site. On July 31, 2005, the Dischargers submitted a work plan to install two shallow wells rather than deep-zone monitoring wells. On August 23, 2005, Water Board staff responded in a letter requiring a work plan for installation of deep-zone monitoring wells unless the responsible parties could demonstrate that they are financially unable to do so. The Dischargers submitted a work plan for deep-well installations on November 30, 2005. From December 2005 through March 2006, Water Board staff discussed the work plan and sent our response letter out as draft to all the stakeholders (Scotts Valley Water District, Scotts Valley Water District's consultants ETIC Engineering, Discharger's consultants Secor Engineering, and Santa Cruz County Environmental Health Agency). After taking into consideration all stakeholder comments, we sent out a final letter on March 28, 2006, requiring the Dischargers to submit a work plan for both on-site and off-site investigation with specified requirements.

### **Recent Progress**

On May 9, 2006, the Discharger submitted a work plan for an off-site monitoring well which fulfilled only part of the requirements set forth in our March 28, 2006 letter. Along with that submittal, the Discharger requested that Water Board staff allow implementation of a chemical oxidation pilot study and allow them to delay the implementation of the off-site work plan. The Discharger submitted a late work plan for on-site investigation on June 14, 2006, fulfilling the rest of our March 28, 2006 requirements. We received two letters from the Pratt Company (Discharger) on May 10, 2006, and May 18, 2006, requesting that Water

Board staff consider withdrawing its requirement to install a deep sentry well (see Attachments 1 and 2). The Pratt Company does not believe there is an imminent threat to Scotts Valley Water District's Well No. 10 because the deep monitoring well MW-13B has not detected contaminants since March 2006. In addition, the Pratt Company explains that they would rather spend their limited resources on implementing active cleanup. After reviewing all submissions and discussing the proposed work with the Scotts Valley Water District and the Santa Cruz County Environmental Health, Water Board staff sent a response letter along with a revised Monitoring and Reporting Program on July 19, 2006 (see Attachment 3). The letter requires implementation of both the proposed off-site and on-site investigative work, submittal of an updated site conceptual model, and repair or destruction and replacement of the missing/damaged monitoring wells. The results of the required work are due by October 30, 2006. A more detailed pilot study work plan is due by August 21, 2006, in lieu of the Corrective Action Plan (CAP) due on August 1, 2006, which was a requirement of CAO No. R3-2005-0081. The CAP is now due by December 15, 2006.

Secor sent an email on August 7, 2006 (see Attachment 4), requesting a two to three month extension on submission of a more detailed pilot study work plan. Water Board staff are considering Secor's request.

The Dischargers submitted their second quarter groundwater monitoring report on July 19, 2006. Based on this recent sampling event in June 2006 (see Attachment 5), groundwater concentrations appear to be stable. Six of the wells' concentrations have decreased and there are increasing concentrations in wells closer towards the pumping wells. These increases are probably a good sign because it indicates good containment.

*MW-17 exhibited a significant increase in cis-1,2-dichloroethene (a breakdown product of PCE) along with a small decline in PCE concentration. MW-18 continues to contain about 1,400 parts per billion (ppb) PCE (the highest PCE concentration observed on the site during first and second quarters 2006). The groundwater extraction and treatment system continues to operate and has removed about 250,000 gallons of contaminated groundwater equaling about 1.7 pounds of PCE since extraction began.*

*The Scotts Valley Water District's Well No. 10 was shut down for approximately one month for annual maintenance and before water demand forced it to go back online on June 21, 2006. The Scotts Valley Water District continues to sample Well No. 10 on a weekly basis and it has not detected PCE or any daughter products during the sampling events.*

#### **ATTACHMENTS**

1. The Pratt Company's May 10, 2006 letter
2. The Pratt Company's May 18, 2006 letter
3. Central Coast Water Board's July 20, 2006 Letter
4. Secor's August 7, 2006 email
5. June 2006 PCE Concentration Site Map

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