Central Valley Regional Water Quality Control Board

6 May 2025

Earl L. Enns, Trustee
The Reedley Environmental
Remediation Trust
6315 Avenue 430
Reedley, CA 93654

NOTICE OF APPLICABILITY FOR WASTE DISCHARGE REQUIREMENTS GENERAL ORDER FOR IN-SITU REMEDIATION AND DISCHARGE OF TREATED GROUNDWATER TO LAND, R5-2015-0012, REEDLEY/ FORMER DRY CLEANER, 1340 G STREET, REEDLEY, FRESNO COUNTY (GLOBAL ID 10000000435)

The Reedley Environmental Remediation Trust hereafter (Discharger) submitted a *Notice of Intent to Comply with the Terms of General Water Discharge Requirements Order No. R5-2015-0012*, *Groundwater Remediation Pilot Test Work Plan - G Street PCE Plume Reedley CA* dated 31 May 2024 and prepared by LEA Environmental, Inc. (LEA). A pilot test is proposed to assess the feasibility of remediation of chemicals in soil and groundwater by the injection of microorganisms and food substrates and other compounds intended to create a reducing environment in groundwater near the treatment area. Based on information in the submittal, it is the Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff determination that the project meets the requirements for implementation under Order No. R5-2015-0012, subject also to the conditions specified below. All of the requirements contained in the General Order are applicable to the project. The project is assigned Order No. **R5-2015-0012-088**.

Project Location:
The project is to be implemented at 1340 G Street, Reedley, Fresno County (Site), Fresno County Assessor's Parcel numbers 368-273-05. The proposed remedial activities are to be implemented near the source zone of the Site (Figure 1).

Project Description:
The Site is a former dry cleaner facility that had historical discharges of tetrachloroethylene (PCE). Investigations at the site have identified PCE in indoor air, soil vapor, and groundwater at concentrations exceeding regulatory screening levels. A network of vapor sampling points beneath and around the building detected PCE and the general distribution of vapor concentrations was consistent with a release from the former dry-cleaning machine that had migrated down to groundwater.

The concentration distribution of PCE in groundwater, known from a network of 32 monitoring wells indicates that the Site is the likely source of a groundwater PCE plume which extends approximately 2,200 feet downgradient to the east-southeast. The plume was vertically delineated, with indications that the plume occurs from the water table which is approximately 70 feet below ground surface (bgs) to about 120 feet bgs at the source area but is submerged down-gradient where its upper surface is about 100 feet bgs and lower surface is about 140 feet bgs. The plume is about 400 feet wide at the source area and about 700 feet wide at its down-gradient margin.

A soil vapor extraction system was installed in January 2020 and operated through the end of 2020. The SVE recovered approximately 93 pounds of PCE. In March 2023, the Discharger submitted a Groundwater RI/FS Report to the Central Valley Water Board which detailed hydrogeologic characteristics of the plume area and evaluated remedial alternatives and selected Enhanced Reductive Dechlorination (ERD) which will induce microbial remediation of PCE. Central Valley Water Board staff, in a letter dated 6 May 2024, was in general agreement with the proposed completion of an ERD pilot study and requested a workplan and Notice of Intent.

The plan involves the installation of four injection points aligned as closely perpendicular to the groundwater flow direction within a section of the plume containing PCE concentrations greater than 500 micrograms per liter (µg/L). Two injection points will be permanent wells, and two will use the push method for testing different delivery methods. These points will be spaced 20 to 25 feet apart to assess the effective radius of influence (ROI), ranging from less than 20 feet to greater than 30 feet. Additionally, three new monitoring wells will be installed between the injection points, with two more downgradient wells to monitor the effectiveness of ERD, ROI, and compliance with waste discharge requirements.

Various ERD mixtures will be tested, which includes GEOFORM, a lecithin-based carbon substrate mixed with water that has been treated by low concentrations of sodium or potassium bisulfite or cysteine to scavenge dissolved oxygen. Other components include KB-1 for bioaugmentation, zero-valent iron (ZVI) for creating an anaerobic environment, and sodium bicarbonate for pH buffering. The amounts injected will depend on the size of the treatment zone and its ROI, with up to 11,000 gallons of carbon substrate, 26 liters of bioaugmentation product, and 4,500 pounds of sodium bicarbonate used for larger zones.

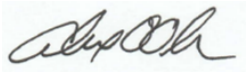
The project will employ tracers to monitor injection sources and monitor the treatment zone for 8-12 months. Results from this pilot test will be used to design a full-scale system for implementation.

A contingency plan has been submitted to address potential adverse effects. If chemical concentrations in compliance wells exceed exceeds its background level by 20% or more, the Discharger will notify the Central Valley Water Board, re-sample within 30 days, and take corrective measures, if necessary, which includes potentially aeration for removal of the injected carbon product. Monitoring will continue to ensure the effectiveness of any corrective actions.

General Information

1. The project will be operated in accordance with the requirements contained in the General Order No. R5-2015-0012 and in accordance with the information submitted in the Work Plan, Notice of Intent, and specified in this Notice of Applicability.
2. The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until this Notice of Applicability is officially revoked.
3. Injection of any material other than those specified above into the proposed injection points is prohibited.
4. The General Order requires a contingency plan for corrective actions should water quality exceed the requirements of the Order at the points of compliance. The General Order prohibits concentrations of metals, total dissolved solids, or electrical conductivity more than 20% greater than their respective baseline levels. The Discharger will implement one or more of the corrective action measures outlined in the contingency plan and as deemed necessary by the Central Valley Water Board.
5. Failure to abide by the conditions of the General Order could result in an enforcement action as authorized by provisions of the California Water Code.
6. The Discharger shall comply with the attached Monitoring and Reporting Program, Order No. **R5-2015-0012-088**, and any revisions thereto as ordered by the Executive Officer.

If you have any questions regarding the information in this letter or regarding the technical aspects of this project, you may contact Paul Dotson, the Central Valley Water Board's project manager, at (559) 445-5525 or paul.dotson@waterboards.ca.gov.



For Patrick Pulupa
Executive Officer

Attachments: Monitoring and Reporting program Order No. R5-2015-0012-088

cc: Fresno County Environmental Health Department, Fresno
Wade Allmon, LEA Environmental, Santa Barbara, CA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM NO. R5-2015-0012-088

FOR

IN-SITU GROUNDWATER REMEDIATION AND DISCHARGE OF TREATED GROUNDWATER TO LAND REEDLEY/FORMER DRY CLEANER 1340 G STREET, REEDLEY FRESNO COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a groundwater remediation system for former dry cleaner facility (Facility) at 1340 G Street in Reedley. This MRP is issued pursuant to Water Code Section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer. As appropriate, California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) staff shall approve specific sample station locations prior to implementation of sampling activities. All samples should be representative of the volume and nature of the discharge or matrix of material sampled. The time, date, and location of each grab sample shall be recorded on the sample chain of custody form.

GROUNDWATER MONITORING

As shown on Figure 1, there are monitoring wells currently at the site. Figure 2 shows the western portion of the Site, with existing monitoring wells, proposed additional monitoring wells, and the proposed direct push injection borings for in-situ groundwater remediation. Monitoring and sampling of these wells and any additional wells installed for the purposes of monitoring the groundwater remediation system subsequent to the issuance of this MRP shall follow the schedule in Table 1 and the samples shall be analyzed by the methods in Table 2. Sample collection and analysis shall follow standard EPA protocol. Currently, semi-annual groundwater monitoring is performed at the site, which should continue to be implemented in addition to the requirements herein. When concurrent sampling for both monitoring programs can meet requirements, a single report can satisfy both reporting objectives.

Table 1:Sampling Frequency

Well Number (1)	Constituent (2)	Frequency	Monitoring Objective
MW-11	See Table 2	Quarterly	Background (3)
IW-2 & IW-2	See Table 2	Quarterly	Treatment Zone (4)
MW-A, MW-B, MW-C	See Table 2	Quarterly	Treatment Zone (4)
MW-D & MW-15	See Table 2	Quarterly	Transition Zone (5)
MW-E	See Table 2	Quarterly	Compliance (6)

1.Well numbers as shown on Figure 2
2.Constuent suite components listed in Table 2
3.Well used to develop background concentrations
4.Wells sampled to evaluate in-situ remediation progress inside the treatment zone.
5.Wells Sampled to evaluate migration of pollutants within the treatment zone.
6.Wells used to determine compliance water groundwater limitations

Table 2: Analytical Methods

Constituent	Method	Maximum Practical Quantitation Limit)
Volatile Organic Compounds	EPA Method 8260B	0.5
Ferrous Iron	SM3500	100
Nitrate	EPA Method 300	300
Dissolved Methane, Ethane, and Ethene	RSK 175M	0.1
Sulfate	EPA Method 300	200
Chloride	EPA Method 300	300
Alkalinity	SM2320B	2000
Manganese	EPA Method 6010	0.93
Total or Dissolved Organic Carbon (TOC/DOC)	EPA Method 9060 or 415.1	300

1. Or an equivalent EPA or Standards Method that achieves the maximum Practical Quantitation Limit.
2 For constituents not detected. All concentrations between the Method Detection Limit and the Practical
Quantitation Limit shall be reported as an estimated value.

Field Sampling

In addition to the above sampling and laboratory analyses, field sampling and analysis shall be conducted each time a monitor well or extraction well is sampled. The sampling and analysis of field parameters shall be as specified in Table 3.

Table 3: Field Sampling

Parameters	Units	Practical Quantitation Limit	Method
pH	pH Units	0.1 units	Field Meter
Water Temperature	ºF/ºC	0.1ºF/ºC	Field Meter
Conductivity	µhmos/cm	50µS/cm^2	Field Meter
Dissolved Oxygen	mg/L	0.2mg/L	Field Meter
Oxidation Reduction Potential	Millivolts	10 millivolts	Field Meter

All wells that are purged shall be purged until pH, temperature, conductivity and dissolved oxygen are within approximately 10% of the previous value.

Field meter usage must include:

1. Operator training in proper use and maintenance of the instruments;
2. Instrument calibration in accordance with the manufacturers specifications prior to each monitoring event;
3. Instrument service and/or calibration by the manufacturer at the recommended frequency; and
4. Submittal of field calibration reports as described in item (b) of the “Reporting” section of this MRP.

IN-SITU DISCHARGE MONITORING

The Discharger shall monitor daily the discharge of water and amendments that are injected into the groundwater according to the requirements specified in Table 4 Each amendment addition shall be recorded individually, along with information regarding the time period over which the amendment was injected into the aquifer.

Table 4: Discharge Monitoring Requirements

Parameters	Units	Type of Sample
Injected Water Volume	Gallons per day/per injection area	Meter
Amendments(s) added	Pounds per day/per injection area	measured

AMENDMENT ANALYSIS

Prior to use, amendments shall be analyzed for the constituents listed in Table 6. The analysis should be done on a mixture of the amendment and deionized water at the estimated concentration that would be injected during the pilot project.

Table 5: Amendment Analytical Requirements

Constituents	Method(1)	Maximum Practical Quantitation Limit (µg/L)(2)
Volatile Organic Compounds	EPA 8020 or 8260B	0.5
General minerals(3)	Various	Various
Metals, Total and Dissolved(4)	EPA 200.7, 200.8	Various
Semi-Volatile Organic Compounds	EPA Method 8270	5
Total Dissolved Solids	EPA 160.1	10,000
pH	Meter	NA
Electrical Conductivity	Meter	NA

1. Or an equivalent EPA Method that achieves the maximum Practical Quantitation Limit.
2 .All concentrations between the Method Detection Limit and the Practical Quantitation Limit shall be reported as an estimated value.
3. General Minerals include: alkalinity, bicarbonate, potassium, chloride, sulfate, total hardness, nitrate, nitrite, ammonia.
4 .Metals include arsenic, barium, cadmium, calcium, total chromium, copper, iron, lead, manganese, magnesium, mercury, molybdenum, nickel, selenium and silica.

ESTABLISHMENT OF BACKGROUND CONCENTRATION VALUES

The Discharger shall develop background groundwater values for c all constituents listed in Table 1 and Table 3, following the procedures found in CCR Section 20415(e)(10). The Discharger shall conduct a baseline sampling event in which all groundwater monitoring wells are sampled prior to implementation of the groundwater remediation. Ongoing monitoring for changes in background concentrations shall be evaluated by conducting four quarters of groundwater monitoring followed by continuing semi-annual monitoring in the background wells.

REPORTING

When reporting the data, the Discharger shall arrange the information in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized in such a manner as to illustrate clearly the compliance with this Order. The results of any monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall also be reported to the Central Valley Water Board.
As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, all reports shall be prepared by a registered professional Civil Engineer or Geologist or their subordinate and signed by the registered professional.

The Discharger shall submit quarterly electronic data reports, which conform to the requirements of the California Code of Regulations, Title 23, Division 3, Chapter 30. The quarterly reports shall be submitted electronically over the internet to the Geotracker database system by the 1st day of the second month following the end of each calendar quarter by 1 February, 1 May, 1 August, and 1 November for the first four quarters. Following the first year of data collection, the frequency of data submittals becomes semi-annually until such time as the Executive Officer determines that the reports are no longer necessary.

Each quarterly and semi-annual report shall include the following minimum information:

(a) a description and discussion of the groundwater sampling event and results, including trends in the concentrations of pollutants and groundwater elevations in the wells, how and when samples were collected, and whether the pollutant plume(s) is delineated;
(b) field logs that contain, at a minimum, water quality parameters measured before, during, and after purging, method of purging, depth of water, volume of water purged, etc.;
(c) groundwater contour maps for all groundwater zones, if applicable;
(d) pollutant concentration maps for all groundwater zones, if applicable;
(e) a table showing well construction details such as well number, groundwater zone being monitored, coordinates (longitude and latitude), ground surface elevation, reference elevation, elevation of screen, elevation of bentonite, elevation of filter pack, and elevation of well bottom;
(f) a table showing historical lateral and vertical (if applicable) flow directions and gradients;
(g) cumulative data tables containing the water quality analytical results and depth to groundwater;
(h) a copy of the laboratory analytical data report;
(i) the status of any ongoing remediation, including an estimate of the cumulative mass of pollutant removed from the subsurface, system operating time, the

effectiveness of the remediation system, and any field notes pertaining to the operation and maintenance of the system; and

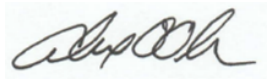
(j) if applicable, the reasons for and duration of all interruptions in the operation of any remediation system, and actions planned or taken to correct and prevent interruptions.

An Annual Report shall be submitted to the Central Valley Water Board by 1 February (1 November for semi-annual monitoring) of each year. This report shall contain an evaluation of the effectiveness and progress of the investigation and remediation. The Annual Report may be substituted for the fourth quarter (or second semi-annual) monitoring report as long as it contains all of the information required for that report plus that required for the Annual Report. The Annual Report shall contain the following minimum information:

(a) both tabular and graphical summaries of all data obtained during the year;
(b) groundwater contour maps and pollutant concentration maps containing all data obtained during the previous year;
(c) a discussion of the long-term trends in the concentrations of the pollutants in the groundwater monitoring wells;
(d) an analysis of whether the pollutant plume is being effectively treated;
(e) a description of all remedial activities conducted during the year, an analysis of their effectiveness in removing the pollutants, and plans to improve remediation system effectiveness; an identification of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program; and
(f) an identification of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program; and
(g) if desired, a proposal and rationale for any revisions to the groundwater sampling plan frequency and/or list of analytes.

A letter transmitting the monitoring reports shall accompany each report. Such a letter shall include a discussion of requirement violations found during the reporting period, and actions taken or planned for correcting noted violations, such as operation or facility modifications. If the Discharger has previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain the penalty of perjury statement by the Discharger, or the Discharger's authorized agent, as described in the Standard Provisions General Reporting Requirements Section B.3 (Attached to the Notice of Applicability).

The Discharger shall implement the above monitoring program on the first day of the month following adoption of this Order.

Ordered by: 

For PATRICK PULUPA
Executive Officer

6 May 2025
Date

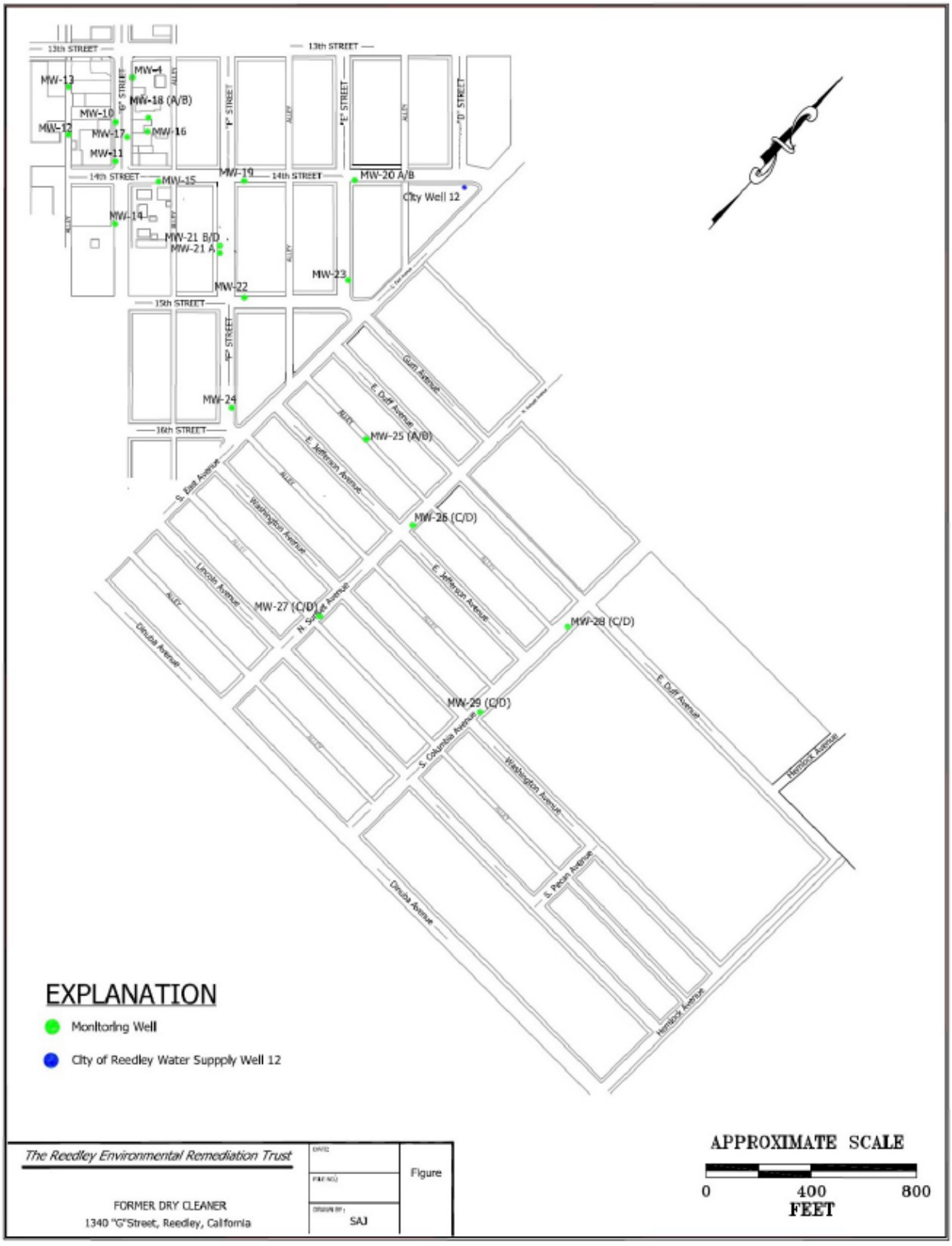


Figure 1:Site Location

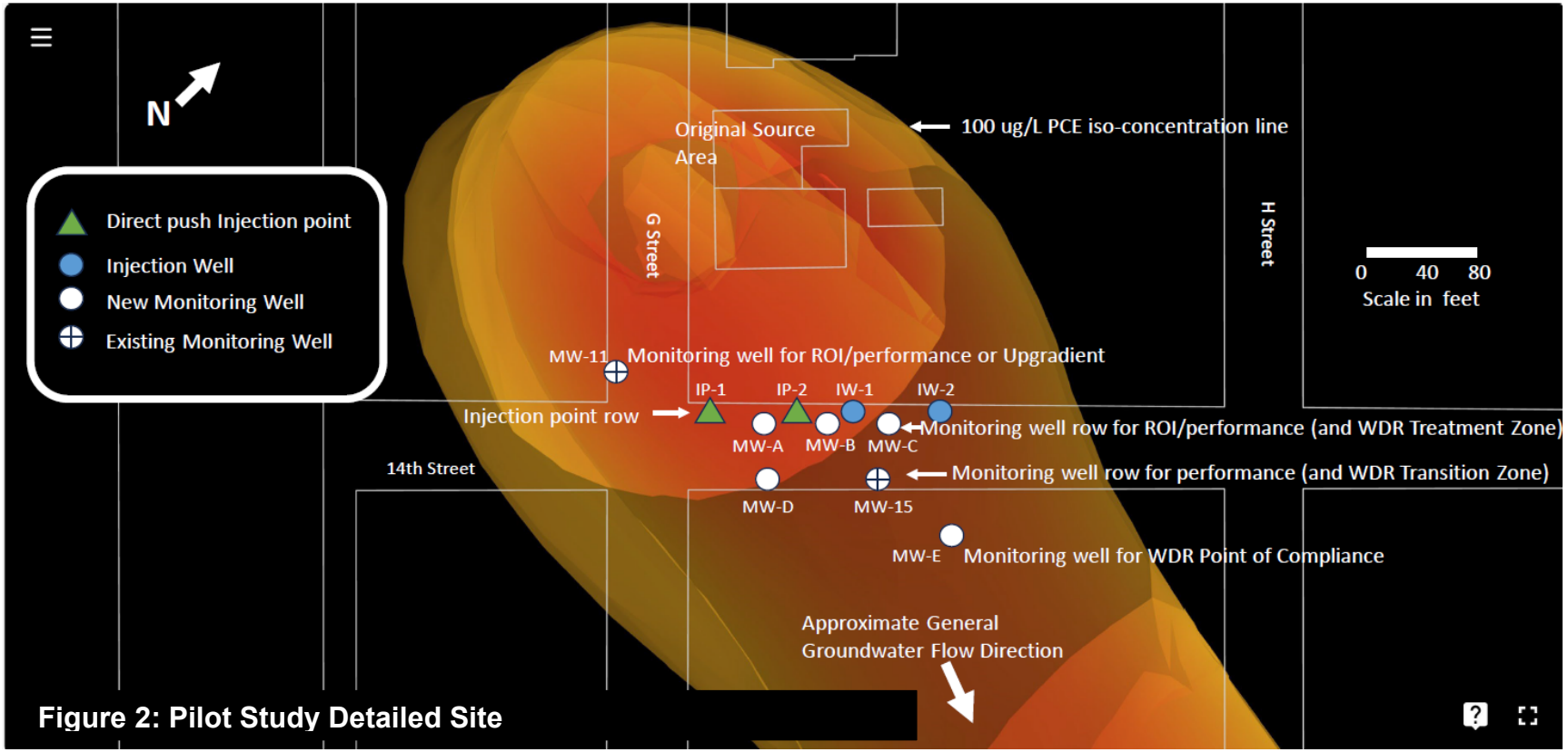


Figure 2: Pilot Study Detailed Site