

California Regional Water Quality Control Board

San Francisco Bay Region

Linda S. Adams
Secretary for
Environmental Protection

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Date: April 20, 2010 File No. 48S0042 (KA)

| Certified Mail No. | |
|------------------------|--|
| Mr. Robert W. Dittmer | |
| 5320 Delos Court | |
| Fairfield, CA 94534 | |
| Certified Mail No. | |
| Mr. Michael L. McInnis | |
| 409 Calle De Caballo | |
| Suisun, CA 94585 | |

SUBJECT: Transmittal of New Tentative Order – Site Cleanup Requirements for Mr. Robert

Dittmer and Mr. Michael McInnis, for the Property Located at 625 Jackson Street

and 901-915 Texas Street, Fairfield, Solano County

Dear Mr. Dittmer and Mr. McInnis:

Attached is a new Tentative Order (Site Cleanup Requirements) for the subject site. The Tentative Order requires the dischargers to complete a site investigation and prepare a remedial action plan, and sets a schedule for its implementation. It also requires implementation of a self monitoring program for groundwater sampling.

This matter will be considered by the Regional Water Board during its regular meeting on Wednesday, June 9, 2010. The meeting will start at 9:00 am and will be held in the first floor auditorium of the Elihu Harris Building, 1515 Clay Street, Oakland, California. Any written comments by you or interested persons must be submitted to the Regional Water Board offices by Wednesday, May 12, 2010. Comments submitted after this date will not be considered by the Regional Water Board.

Pursuant to section 2050(c) of Title 23 of the California Code of Regulations, any party that challenges the Regional Water Board's action on this matter through a petition to the State Water Board under Water Code section 13320 will be limited to raising only those substantive issues or objections that were raised before the Regional Water Board at the public hearing or in timely submitted written correspondence delivered to the Regional Water Board (see above).



If you have any questions, please contact Kent Aue of my staff at (510) 622-2446 [e-mail kaue@waterboards.ca.gov].

Sincerely,

Bruce H. Wolfe Executive Officer

Attachment

cc with attachment:

 $\begin{array}{ll} \text{Mr. Thomas DeArth} & \underline{\text{tdearth@gercorp.com}} \\ \text{Dr. Victor Fisher} & \underline{\text{vfisher@gercorp.com}} \end{array}$

Genesis Engineering & Redevelopment

Mr. David R. Isoladisola@isolalaw.comMr. Jeffrey W. Hawkinsjhawkins@isolalaw.comMr. Stephen B. Ardissardis@isolalaw.co

Isola Law Group, L.L.P.

Ms. Carol Jones Carol.Jones@aig.com

AIG Consultants, Inc., Environmental Claims Division

Mr. David White <u>dwhite@ci.fairfield.ca.us</u>

City of Fairfield Office of the City Manager

Mr. Matthew Geisert mgeisert@solanocounty.co

Solano County Department of Resource Management

REVIEW DRAFT

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN FRANCISCO BAY REGION

TENTATIVE ORDER

ADOPTION OF SITE CLEANUP REQUIREMENTS FOR:

MR. ROBERT W. DITTMER AND MR. MICHAEL L. MCINNIS

for the property located at 625 Jackson Street and 901 - 915 Texas Street Fairfield, Solano County

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Regional Water Board), finds that:

- 1. **Site Location:** The site is a half-acre property located on the corner of Texas and Jackson Streets occupied by several attached buildings housing different businesses. The approximate dimensions of the site are about 100 feet along Texas Street and approximately 150 feet along Jackson Street. The buildings at 625 Jackson Street (the former Fairfield Cleaners location) and at 901 915 Texas Street are within the downtown commercial district of the City of Fairfield. Texas Street is the main street through downtown and Jackson Street is a primary cross-street. A residential neighborhood is located approximately one block south of 625 Jackson Street.
- 2. **Site History:** Fairfield Cleaners conducted dry cleaning operations at 625 Jackson Street for about fifty years beginning in the mid 1950s, then briefly served as a drop-off/pickup location for cleaning in the past several years, and is now vacant. The adjoining buildings at 901 915 Texas Street have been used for a variety of businesses over a period of many years, including a car dealership and a gasoline station with auto repair facilities. This Order has been adopted because soil and groundwater at the site and in the vicinity of Fairfield Cleaners are significantly impacted by the dry cleaning solvent perchloroethylene (PCE) and related volatile organic compounds (VOCs).
- 3. **Named Dischargers:** Mr. Robert W. Dittmer is named as a discharger because he is a current owner of the property on which there has been a discharge of pollutants, has knowledge of the discharge or the activities that caused the discharge, and has the legal ability to control the discharge. Mr. Michael L. McInnis is named as a discharger because he is also a current owner of the property on which there has been a discharge of pollutants, has knowledge of the

discharge or the activities that caused the discharge, and has the legal ability to control the discharge. Mr. Dittmer and Mr. McInnis have co-owned this property together since April 19, 1965.

There was a family-owned dry cleaner operating on the property in 1965 when Mr. Dittmer and Mr. McInnis purchased the property. The dry cleaning business occupying the property changed owners several times over the 50-year period of operation. Information available to the Regional Water Board indicates that all of these owner-operators were small business proprietors and their whereabouts are currently unknown. For these reasons they have not been named as dischargers in this Order.

If additional information is submitted indicating that other parties caused or permitted any waste to be discharged on the site where it entered or could have entered waters of the State, the Regional Water Board will consider adding those parties' names to this Order.

- 4. **Regulatory Status:** This site is currently not subject to a Regional Water Board Order.
- 5. **Site Hydrogeology:** The site is in an area of low relief at 10 feet above mean sea level (msl) about one-half mile north of Suisun Slough. Unconfined groundwater is encountered during drier months at a depth of about 3 to 4 feet below ground surface (bgs), rising to about 2 to 3 feet bgs during the winter. Groundwater flows southeast beneath the site with a gradient of about 0.002 to 0.005 ft/ft. The shallow gradient reflects the low elevation of the site and its proximity to Suisun Slough. Groundwater recharge occurs principally in undeveloped areas to the north and west of the City of Fairfield, through unlined drainage channels, and on undeveloped parcels throughout the city. There is no evidence that groundwater at the site is tidally influenced.

The thick sequence of sediment at the site was deposited by streams flowing southeast from the hills northwest of the site toward Suisun Slough, along with periodic flood deposits from the Sacramento River. Shallow soil at the site is predominately silt and clay flood deposits interspersed with occasional thin sand stringers that represent buried channel deposits from small intermittent streams. With increasing depth, the sand units become more abundant and are generally coarser in texture, thicker, and laterally more continuous. Groundwater beneath the site preferentially flows through the coarser-textured strata. Genesis Engineering and Redevelopment (Genesis), an environmental consulting firm representing the dischargers, has designated shallow, intermediate, and deeper water bearing zones beneath the site based primarily on the occurrence and abundance of coarse-textured strata. These zones are not well defined and laboratory analytical data indicate that there is hydraulic communication between these zones.

6. **Remedial Investigation:** A report of unauthorized release was made for this site in July 2000 as a result of a limited site assessment completed in June 2000. The Regional Water Board opened a case file on the site in November 2000, and the results of a preliminary site characterization were reported in December 2001. Laboratory analytical reports for samples from shallow groundwater monitoring wells installed for this characterization work show high concentrations of the VOCs PCE, trichloroethylene (TCE), dichloroethylene (DCE), and vinyl chloride, and significant concentrations of petroleum hydrocarbons.

Over the next seven years three subsequent consulting firms conducted limited soil gas surveys and installed additional groundwater monitoring wells in the shallow, intermediate, and deep water bearing zones near the site. Currently there are a total of 27 groundwater monitoring wells associated with this site: 17 shallow zone wells; 8 intermediate zone wells; and 2 deep zone wells. Laboratory analytical reports for groundwater samples collected from these wells indicate that PCE, TCE, DCE, and vinyl chloride are present in the shallow and intermediate zones at concentrations up to three orders of magnitude above California maximum contaminant levels (MCLs) for these contaminants. PCE has been reported in groundwater samples collected from a deep zone well at a concentration below the MCL for this compound.

The fourth quarter 2009 groundwater monitoring report for the site indicates that contaminant plumes in shallow and intermediate groundwater zones extend offsite to the southeast. Groundwater samples from the farthest downgradient shallow well approximately 350 feet from the site contained 1,340 micrograms per liter (ug/L, equivalent to parts per billion (ppb)) PCE, 60 ug/L TCE, 72 ug/L total DCE, and 1.5 ug/L vinyl chloride. The corresponding contaminant concentrations reported in the intermediate zone at this location are: 2,440 ug/L PCE, 89 ug/L TCE, 112 ug/L total DCE, and 3.4 ug/L vinyl chloride. For reference, the MCL for PCE is 5 ug/L. These data indicate that these contaminants are migrating downward and away from the site. Based on the high concentrations of the contaminants reported at a considerable distance from the site, these contaminant plumes may actually extend several additional hundreds of feet downgradient.

- 7. **Interim Remedial Measures:** No interim remedial measures have been undertaken at this site.
- 8. **Adjacent Sites:** On behalf of the dischargers, Genesis has identified several nearby properties where previous businesses used chemicals similar to those found in soil and groundwater near this site. A printing shop that may have used these chemicals previously operated downgradient across the street at 622 Jackson Street for approximately 10 years. Other dry cleaners previously operated crossgradient across the street at 630 Jackson Street and about one block upgradient at 712 Madison Street. These dry cleaners operated for approximately 10 years and 40 years, respectively. Based on currently available hydrogeologic data and laboratory analytical reports of samples from groundwater monitoring wells near

the site, the potential impact on groundwater at this site from other sources is uncertain. No release of contaminants has been confirmed at any of these sites.

9. **Basin Plan:** The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Board, U.S. EPA, and the Office of Administrative Law where required.

The potential beneficial uses of groundwater underlying and adjacent to the site include:

- a. Municipal and domestic water supply
- b. Industrial process water supply
- c. Industrial service water supply
- d. Agricultural water supply
- e. Freshwater discharge to Suisun Slough

At present there is no known use of groundwater directly underlying the site, however, a detailed search for private wells downgradient of the site has not been conducted.

10. **Other Regional Water Board Policies:** Regional Water Board Resolution No. 88-160 allows discharges of extracted, treated groundwater from site cleanups to surface waters only if it has been demonstrated that neither reclamation nor discharge to the sanitary sewer is technically and economically feasible.

Regional Water Board Resolution No. 89-30, "Sources of Drinking Water", defines potential sources of drinking water to include all groundwater in the region, with limited exceptions for areas of high TDS, low yield, or naturally high contaminant levels.

11. **State Water Board Policies:** State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California", applies to this discharge and requires attainment of background levels of water quality, or the highest level of water quality which is reasonable if background levels of water quality cannot be restored. Cleanup levels other than background must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of such water, and not result in exceedance of applicable water quality objectives. Given the Regional Water Board's past experience with groundwater pollution cases of this type, it is unlikely that background levels of water quality can be restored. This initial conclusion will be verified when a remedial action plan is prepared. This order and its requirements are consistent with Resolution No. 68-16.

State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304", applies to this discharge. This order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

- 12. **Preliminary Cleanup Goals:** The discharger will need to make assumptions about future cleanup standards for soil and groundwater in order to determine the necessary extent of remedial investigation, interim remedial actions, and the draft remedial action plan. Pending the establishment of site-specific cleanup standards, the following preliminary cleanup goals should be used for these purposes:
 - a. Groundwater: Applicable screening levels such as the Regional Water Board's Environmental Screening Levels (ESLs) document. Groundwater screening levels should incorporate at least the following exposure pathways: groundwater ingestion, inhalation, and vapor intrusion to indoor air. For groundwater ingestion, use applicable water quality objectives (e.g., lower of primary or secondary maximum contaminant levels, MCLs) or, in the absence of a chemical-specific objective, equivalent drinking water levels based on toxicity and taste and odor concerns.
 - b. Soil: Applicable screening levels such as the Regional Water Board's ESLs document. Soil screening levels are intended to address a full range of exposure pathways, including direct exposure, nuisance, and leaching to groundwater. For purposes of this subsection, the discharger should assume that groundwater is a potential source of drinking water.
 - c. Soil gas: Applicable screening levels such as the Regional Water Board's ESLs document. Soil gas screening levels are intended to address the vapor intrusion to indoor air pathway.
- 13. **Basis for 13304 Order:** California Water Code Section 13304 authorizes the Regional Water Board to issue orders requiring a discharger to clean up and abate waste where the discharger has caused or permitted waste to be discharged or deposited where it is or probably will be discharged into waters of the State and creates or threatens to create a condition of pollution or nuisance.
- 14. **Cost Recovery:** Pursuant to California Water Code Section 13304, the dischargers are hereby notified that the Regional Water Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Regional Water Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, and other remedial action, required by this order.

- 15. **CEQA:** This action is an order to enforce the laws and regulations administered by the Regional Water Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.
- 16. **Notification:** The Regional Water Board has notified the dischargers and all interested agencies and persons of its intent under the California Water Code Section 13304 to prescribe site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.
- 17. **Public Hearing:** The Regional Water Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the discharger (or its agents, successors, or assigns) shall clean up and abate the effects described in the above findings as follows:

A. **PROHIBITIONS**

- 1. The discharge of wastes or hazardous substances in a manner which will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.
- 2. Further significant migration of wastes or hazardous substances through subsurface transport to waters of the State is prohibited.
- 3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of wastes or hazardous substances are prohibited.

B. TASKS

1. WORKPLAN TO DELINEATE SOURCES

COMPLIANCE DATE: August 13, 2010

Submit a workplan acceptable to the Executive Officer to identify and laterally and vertically delineate all the sources of pollution on the site. The workplan shall specify objectives, investigation methods and rationale, and a proposed time schedule.

2. COMPLETION OF SOURCE DELINEATION

COMPLIANCE DATE: December 31, 2010

Submit a technical report acceptable to the Executive Officer documenting procedures and completion of the scope of work described in the Task 1 workplan. The technical report shall identify and describe confirmed and potential on-site sources of pollution.

3. RISK ASSESSMENT WORKPLAN

COMPLIANCE DATE: March 31, 2011

Submit a workplan acceptable to the Executive Officer for preparation of a site-specific risk assessment. The workplan shall incorporate the conceptual site model (i.e., identify pathways and receptors where site contaminants pose a potential threat to human health or the environment). The workplan shall propose methods and procedures for assessing risk that incorporate current standards of practice at the time the work is performed. This task shall be performed concurrently with Task 4.

4. REMEDIAL INVESTIGATION WORKPLAN

COMPLIANCE DATE: March 31, 2011

Submit a workplan acceptable to the Executive Officer to delineate and describe the lateral and vertical extent of soil and groundwater pollution on and downgradient of the site, and define potential contaminant migration pathways. The workplan shall specify objectives, investigation methods and rationale, and a proposed time schedule. Regional Water Board staff may allow the work proposed in this document to be phased to allow investigation to proceed efficiently, provided that this does not delay compliance. This task shall be performed concurrently with Task 3.

5. INTERIM REMEDIAL ACTION WORKPLAN

COMPLIANCE DATE: July 1, 2011 or 45 days following a requirement letter from the Executive Officer, whichever date is earlier

Submit a workplan acceptable to the Executive Officer to evaluate interim remedial action alternatives and to recommend one or more alternatives for implementation. The workplan shall specify remedial objectives and propose a time schedule. Regional Water Board staff may allow work to be phased to enable the investigation to proceed efficiently. If groundwater extraction is selected as an interim remedial action, then one aspect of this task will be the completion of an NPDES permit application for discharge of extracted, treated groundwater to waters of the State. The application must demonstrate that neither reclamation nor discharge to the sanitary sewer is technically or economically feasible.

6. COMPLETION OF INTERIM REMEDIAL ACTIONS

COMPLIANCE DATE: 90 days following acceptance of Task 5 workplan

Submit a technical report acceptable to the Executive Officer documenting completion of the scope of work identified in the Task 5 workplan. For ongoing actions, such as soil vapor extraction or groundwater extraction, the report(s) shall document start-up, operation, and maintenance, as opposed to completion. Depending upon the type of interim remedial action implemented and the results, additional activities and additional reports may be required by the Executive Officer.

7. COMPLETION OF REMEDIAL INVESTIGATION

COMPLIANCE DATE: September 2, 2011

Submit a technical report acceptable to the Executive Officer documenting procedures and completion of the scope of work described in the Task 4 workplan. The technical report shall include a well-documented conceptual site model supported by hydrogeological and chemical data developed during the investigation. The report shall also delineate and describe the lateral and vertical extent of pollution down to concentrations at or below typical cleanup standards for soil and groundwater. Based on the results of the investigation described in the report, the Executive Officer may determine that additional work under Task 4 and Task 7 of this Order is necessary to complete the remedial investigation.

8. COMPLETION OF RISK ASSESSMENT

COMPLIANCE DATE: September 2, 2011

Submit a technical report acceptable to the Executive Officer documenting completion of the scope of work identified in the Task 3 risk assessment workplan. The report shall comprise a fully documented site-specific human health and ecological risk assessment. The results of this report will help establish acceptable exposure levels, to be used in developing remedial alternatives in Task 9 below.

9. **DRAFT REMEDIAL ACTION PLAN INCLUDING DRAFT CLEANUP STANDARDS**

COMPLIANCE DATE: 60 days following Executive Officer approval of Task 8 report

Submit a technical report acceptable to the Executive Officer containing:

- a. Summary of remedial investigation
- b. Summary of risk assessment
- c. Evaluation of the installed interim remedial actions
- d. Feasibility study evaluating alternative final remedial actions
- e. Recommended final remedial actions and cleanup standards
- f. Implementation tasks and time schedule

Item d shall include projections of cost, effectiveness, benefits, and impact on public health, welfare, and the environment of each alternative action.

Items a through d shall be consistent with the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), CERCLA guidance documents with respect to remedial investigations and feasibility studies, Health and Safety Code Section 25356.1(c), and State Water Board Resolution No. 92-49 as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304").

Item e shall consider the preliminary cleanup goals for soil and groundwater identified in finding 12 and shall address the attainability of background levels of water quality (see finding 11).

10. **Delayed Compliance**: If the discharger is delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the discharger shall promptly notify the Executive Officer, and either the Regional Water Board or Executive Officer may consider revision of this Order.

C. PROVISIONS

- 1. **No Nuisance**: The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in California Water Code Section 13050(m).
- 2. **Good Operation and Maintenance (O&M)**: 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. **Cost Recovery**: The discharger shall be liable, pursuant to California Water Code Section 13304, to the Regional Water Board for all reasonable costs actually incurred by the Regional Water Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the site addressed by this Order is enrolled in a State Water

Board-managed reimbursement program, reimbursement shall be made in a timely manner pursuant to this Order and according to the procedures established in that program. Any disputes raised by the discharger over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.

- 4. **Access to Site and Records**: In accordance with California Water Code Section 13267(c), the discharger shall permit the Regional Water Board or its authorized representative:
 - a. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
 - b. Access to copy any records required to be kept under the requirements of this Order.
 - c. Inspection of any monitoring or remediation facilities installed in response to this Order.
 - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the discharger.
- 5. **Self-Monitoring Program**: The discharger shall comply with the Self-Monitoring Program as attached to this Order and as may be amended by the Executive Officer.
- 6. **Contractor / Consultant Qualifications**: All technical documents shall be signed by and stamped with the seal of a California registered geologist or a California registered civil engineer.
- 7. **Lab Qualifications**: All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Regional Water Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control (QA/QC) records for Regional Water Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g., temperature).
- 8. **Uploading Documents to the Geotracker database**: Electronic copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be uploaded to the State Water Board's Geotracker database within five business days after submittal to the Regional Water Board. Guidance for electronic information submittal is available at:

http://www.waterboards.ca.gov/cwphome/ust/cleanup/electronic_reporting/index.html

9. **Document Distribution**: An electronic copy and one paper copy of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the Regional Water Board. An electronic copy of all documents submitted to the Regional Water Board shall also be provided to the following agency:

County of Solano, Department of Resource Management, Environmental Health Division

The Executive Officer may modify this distribution list.

- 10. **Reporting of Changed Owner or Operator**: The discharger shall submit a technical report to the Regional Water Board on any changes in site occupancy or ownership associated with the property described in this Order within 30 days of the change.
- 11. **Reporting of Hazardous Substance Release**: If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, the discharger shall report such discharge to the Regional Water Board by calling (510) 622-2369.

A written report shall be submitted to the Regional Water Board within five business days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/agencies notified.

This reporting is in addition to reporting to the Office of Emergency Services required pursuant to the Health and Safety Code.

12. **Periodic SCR Review**: The Regional Water Board will review this Order periodically and may revise the requirements of the Order. The discharger may request revisions, and upon review the Executive Officer may recommend that the Regional Water Board revise these requirements.

| I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, t | rue |
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| and correct copy of an Order adopted by the California Regional Water Quality Cor | ntro] |
| Board, San Francisco Bay Region, on | |

| Bruce H. Wolfe |
|-------------------|
| Executive Officer |

FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY

Attachments: Site Map

Self-Monitoring Program

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM FOR:

MR. ROBERT W. DITTMER and MR. MICHAEL L. MCINNIS

for the property located at

625 JACKSON STREET and 901 - 915 TEXAS STREET CITY OF FAIRFIELD SOLANO COUNTY

- 1. **Authority and Purpose**: The Regional Water Board requests the technical reports required in this Self-Monitoring Program pursuant to Water Code Sections 13267 and 13304. This Self-Monitoring Program is intended to document compliance with Regional Water Board Order No. <u>XX-XXX</u> (Site Cleanup Requirements).
- 2. **Monitoring**: The discharger shall measure groundwater elevations in all monitoring wells, and shall collect and analyze representative samples of groundwater according to the following schedule:

| Well # | Sampling Frequency | Analyses | Well # | Sampling Frequency | Analyses |
|--------|-----------------------|----------|--------|-----------------------|----------|
| MW-1 | SA | 8260 | MW-11I | SA | 8260 |
| MW-1I | SA | 8260 | MW-12 | SA | 8260 |
| MW-2 | SA | 8260 | MW-12I | SA | 8260 |
| MW-3 | SA | 8260 | MW-13 | SA | 8260 |
| MW-4 | SA | 8260 | MW-14I | SA | 8260 |
| MW-5 | SA | 8260 | MW-14D | SA | 8260 |
| MW-6 | SA | 8260 | MW-15 | SA | 8260 |
| MW-7 | SA | 8260 | MW-16 | SA | 8260 |
| MW-7I | SA | 8260 | MW-16I | SA | 8260 |

| MW-8 | SA | 8260 | MW-17 | SA | 8260 |
|--------|----|------|--------|----|------|
| MW-9 | SA | 8260 | MW-18 | SA | 8260 |
| MW-10 | SA | 8260 | MW-18I | SA | 8260 |
| MW-10I | SA | 8260 | MW-18D | SA | 8260 |
| MW-11 | SA | 8260 | | | |

Key: Q = Quarterly 8020 = EPA Method 8020 or equivalent SA = Semi-Annually 8260 = EPA Method 8260 or equivalent

A = Annually

The discharger shall sample the existing monitoring wells shown in the table semi-annually and new monitoring and extraction wells quarterly for at least the first year following installation. Wells on a semi-annual sampling schedule shall be sampled during the first and third quarters to provide data on groundwater elevation changes. Groundwater samples shall be analyzed using the USEPA method(s) shown in the above table. The discharger may propose changes in the sampling and analytical program; any proposed changes are subject to Executive Officer approval.

- 3. **Groundwater Monitoring Reports**: The discharger shall submit routine monitoring reports to the Regional Water Board no later than 30 days following the end of the quarter (e.g., report for first quarter of the year due April 30) in which the monitoring even occurred. The first semi-annual monitoring report required under this Order shall be due within 30 days following the end of either the first or third quarter after this Order is adopted; whichever occurs first. As noted above, new wells shall initially be sampled each quarter for the first year, and a monitoring report shall be submitted within 30 days following the end of each quarter. Each report shall be a stand-alone document and shall include, at a minimum:
 - a. Transmittal Letter: The transmittal letter shall discuss any deviations or violations during the reporting period and actions taken or planned to correct the problem. The letter shall be signed by the discharger or his/her duly authorized representative, and shall 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. The report shall be signed and stamped by a California registered geologist or California registered engineer.
 - b. Groundwater Elevations: Groundwater elevation data shall be presented in tabular form, and a groundwater elevation map shall be prepared for each monitored water-bearing zone. A graph and a table showing

- historical groundwater elevations shall be included in the fourth quarterly report each year. Groundwater elevations shall be measured from a surveyed point at each well established by a California licensed surveyor.
- c. Groundwater Analyses: Groundwater elevation and analytical data shall be presented in tabular form, and isoconcentration maps shall be prepared for one or more key contaminants for each monitored water-bearing zone, as appropriate. The report shall indicate the analytical method(s) used, detection limits obtained for each reported constituent, and a summary of QA/QC data. A graph and a table showing historical groundwater sampling results shall be included in the fourth quarterly report each year. The report shall describe any significant changes in contaminant concentration or changes in groundwater elevation since the last report, and any measures proposed to address any increases observed. Supporting data, such as lab data sheets, need not be included (however, see record keeping below).
- d. Groundwater Extraction: If applicable, the report shall include groundwater extraction results in tabular form, for each extraction well and for the site as a whole, expressed in gallons per minute and total groundwater volume for the quarter. The report shall also include contaminant removal results, from groundwater extraction wells and from other remediation systems (e.g., soil vapor extraction), expressed in units of chemical mass per unit of groundwater extracted, mass per day and mass for the quarter. Historical mass removal results shall be included in the fourth quarterly report each year. Mass removal results shall also be displayed graphically.
- e. Project Status Report: The monitoring report shall describe relevant work completed during the reporting period (e.g., site investigation, interim remedial measures) and work planned for the following quarter.
- 4. **Violation Reports**: If the discharger violates requirements in the Site Cleanup Requirements, then the discharger shall notify the Regional Water Board office by telephone and email as soon as practicable once the discharger has knowledge of the violation. Regional Water Board staff may, depending on violation severity, require the discharger to submit a separate technical report on the violation within five working days of notification. Regional Water Board staff shall specify the content and scope of this report.
- 5. **Other Reports**: The discharger shall notify the Regional Water Board in writing a minimum of five business days prior to any site activities, such as construction or underground tank removal, which have the potential to cause further migration of contaminants or which would provide new opportunities for site investigation.

- 6. **Record Keeping**: The discharger or his/her agent shall retain data generated for the above reports, including lab results and QA/QC data, for a minimum of six years after origination and shall submit copies of these documents to the Regional Water Board upon request.
- 7. **SMP Revisions**: Revisions to the Self-Monitoring Program may be ordered by the Executive Officer, either on his/her own initiative or at the request of the discharger. Prior to making SMP revisions, the Executive Officer will consider the burden, including costs, of associated self-monitoring reports relative to the benefits to be obtained from these reports.
- 8. **Uploading Reports to the Geotracker database:** All monitoring reports shall be uploaded to the State Water Board's Geotracker database within five business days of submittal to the Regional Water Board. An electronic copy and one paper copy of all reports shall be submitted to the Regional Water Board, and an electronic copy submitted to the Solano County Department of Resource Management, Environmental Health Division.

