

TECHNICAL ANALYSIS

FOR

ADDEDNUM NO. 3

TO

CLEANUP AND ABATEMENT ORDER NO. R9-2005-0017

**TRUSTEES OF THE BULEN FAMILY TRUST
LA CAZE ESCONDIDO PARTNERSHIP
EMIL ROSE PARTNERS II, L.P.
BENEFICIAL STANDARD PROPERTIES, INC.
LEON W. PARMA AND BARBARA B. PARMA
LA JOLLA CAPITAL, INC.
KHOSROU TAHBAZ
VERN LOVETT
WAYNE TERRY**

**LOVETT'S ONE HOUR DRY CLEANERS
1378 EAST GRAND AVENUE
ESCONDIDO, CALIFORNIA
SAN DIEGO COUNTY**

June 2007

STATE OF CALIFORNIA

ARNOLD SCHWARZENEGGER, Governor
LINDA S. ADAMS, Secretary, California Environmental Protection Agency



**California Regional Water Quality Control Board
San Diego Region**

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John H. Robertus, *Executive Officer*
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by

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I. INTRODUCTION

This technical analysis provides a summary of factual evidence supporting issuance of Addendum No. 3 to Cleanup and Abatement Order (CAO) R9-2005-0017 to the Trustees of the Bulen Family Trust, La Caze Escondido Partnership, Emil Rose Partners II, L.P., Beneficial Standard Properties, Inc., Leon W. Parma and Barbara B. Parma, La Jolla Capital, Inc., Khosrou Tahbaz, Vern Lovett, and Wayne Terry for discharges from Lovett's One Hour Dry Cleaners. A copy of Cleanup and Abatement Order (CAO) R9-2005-0017, Addendum No. 3, Addendum No. 2, and Addendum No. 1 are posted on the Regional Board website at <http://www.waterboards.ca.gov/sandiego> and on the State's Geotracker database at <http://geotracker.swrcb.ca.gov/>. To locate the information for this release case, interested parties can search Geotracker using the site's address of 1378 East Grand Ave or by global identification number **T0608101408**.

Chlorinated hydrocarbon waste (tetrachloroethylene (PCE) and trichloroethylene (TCE)) was discharged to soil and ground water from the Lovett's One Hour Dry Cleaners. During efforts to monitor impacts to ground water from this release of waste elevated concentrations of contaminants were discovered in MW-10. Discovery of such concentrations are evidence that the plume has migrate further to the north.

II. BACKGROUND

Lovett's One Hour Dry Cleaners is located at 1378 East Grand Avenue in Escondido (the Site) on property owned by the trustees of the Bulen Family Trust, since 1961. The parcel encompasses approximately 1,800 square feet. The Site has operated as a dry cleaner facility since the mid-1960s, but it was not until 1994, during activities to upgrade the dry cleaning machine(s) that stained concrete was identified and an environmental investigation launched. On August 23, 2005 the Regional Board issued Cleanup and Abatement Order (CAO) R9-2005-0017, *Bulen Family Trust, Lovett's One Hour Dry Cleaners, 1387 East Grand Avenue, Escondido, California, San Diego County*.

The responsible parties' consultant regularly monitors ground water at the Site. During the March 2007 monitoring event elevated concentrations of TCE were discovered in MW-10. Elevated contaminant concentrations in this area are evidence that the plume has migrated north of the dry cleaner site. Addendum No. 3 to CAO R9-2005-0017 requires additional plume characterization in the area near and downgradient of MW-10.

In response to the recent plume discovery and the current level of data collected for this Site, it is appropriate that the owners and tenants of the property(ies) affected be notified that action to characterize and remediate a release of waste from the Lovett's Dry Cleaners is ongoing.

III. BASIS FOR FINDINGS IN ADDENDUM NO. 3 TO CAO R9-2005-0017

The text of each finding of Cleanup and Abatement Order Addendum No. 3 is presented below followed by a summary of the rationale and factual evidence supporting the finding.

1. **CLEANUP AND ABATEMENT ORDER NO. R9-2005-0017.** Except as contradicted, amended, or superceded by the findings set forth in this Cleanup and Abatement Order Addendum No. 3, all of the previous findings of Cleanup and Abatement Order No. R9-2005-0017 (CAO) and Addendum No. 1 and 2 are incorporated herein by reference.

Basis For Finding No. 1:

On August 23, 2005 the Regional Board issued Cleanup and Abatement Order (CAO) R9-2005-0017, *Bulen Family Trust, Lovett's One Hour Dry Cleaners, 1387 East Grand Avenue, Escondido, California, San Diego County*. The rationale and factual evidence supporting the findings of the Cleanup and Abatement Order is contained in Technical Analysis for Cleanup and Abatement Order No. R9-2005-0017 dated August 23, 2005. On April 18, 2006, the Regional Board issued Addendum No. 1 to CAO R9-2005-0017. The rationale and factual evidence supporting the findings of Addendum No. 1 is contained in Technical Analysis for Addendum No. 1 to CAO R9-2005-017. On January 8, 2007, the Regional Board issued Addendum No. 2 to CAO R9-2005-0017. The rationale and factual evidence supporting the findings of Addendum No. 2 is contained in Technical Analysis for Addendum No. 2 to CAO R9-2005-017.

2. **NEW INFORMATION.** Ground-water sampling data collected during the December 2006 ground-water monitoring event revealed the presence of PCE and TCE in MW-10 at significantly higher concentrations than previous monitoring events. High concentrations of PCE and TCE indicate movement of the chlorinated solvent plume north of the historical release location. Concentrations of PCE and TCE in MW-10 are 14,000 ug/l and 6,900 ug/l respectively.

Basis For Finding No. 2:

Pursuant to the technical data submitted in the Groundwater Monitoring Report March 2007 Event data April 2007. Concentrations of PCE in MW-10 increased from 2 ug/l (Dec 2006 sampling event) to 14,000 ug/l (March 2007 sampling event). Concentrations of TCE in MW-10 increased from non detectable levels in December 2006 to 6,900 ug/l in March 2007. Concentrations of cis-1,2-DCE increased from 39 ug/l in August 2006 to 150,000 ug/l during the December 2006 and 130,000 ug/l March 2007 sampling event.

3. **EXTENDED SITE INVESTIGATION.** Elevated concentrations of contaminants were recently found in the ground water near MW-10. To assess the extent of

contamination, extended site investigation activities are required. Extended site investigation activities shall include, but not be limited to, additional soil, ground water, and soil vapor data collection in the area surrounding and downgradient of MW-10.

Basis For Finding No. 3:

Concentrations of PCE in MW-10 increased from 2 ug/l (Dec 2006 sampling event) to 14,000 ug/l (March 2007 sampling event). Concentrations of TCE in MW-10 increased from nondetectable levels in December 2006 to 6,900 ug/l in March 2007. Concentrations of cis-1,2-DCE increased from 39 ug/l in August 2006 to 150,000 ug/l during the December 2006 and 130,000 ug/l in the March 2007 sampling event. The maximum contaminant level for PCE and TCE is 5 ug/l, and cis-1,2-DCE is 6 ug/l. Pursuant to State Water Resources Control Board Resolution No. 92-49, "*Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304,*" additional site investigation in the area near and downgradient from MW-10 is required to determine the horizontal and vertical extent of the discharge.

4. **COMMUNITY RELEATIONS/PUBLIC NOTIFICATION.** The discharge of chlorinated solvents from the Lovett's One Hour Dry Cleaners has migrated beneath the Escondido Union School District Offices and the shopping mall located to the northwest. Recent ground-water sampling data indicate that the plume has migrated towards the north and may be located under the Home Depot. The owners and tenants in any building located above the footprint of the plume shall be notified of the plume and kept informed of site investigation and remediation efforts as directed by the Regional Board.

Basis For Finding No. 4:

The State Water Resources Control Board and Regional Water Quality Control Board's Public Participation at Cleanup Sites Guidance April 2005. State Water Resources Control Board Resolution No. 92-49 "*Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304.*"

5. **MONITORING WELL(S) DESTRUCTION.** Monitoring wells can provide a pathway for the movement of poor-quality water, pollutants, and contaminants. Because monitoring wells provide a direct conduit to groundwater, they pose an especially significant threat to ground-water quality if they are not properly constructed, altered, maintained, and destroyed. To avoid potential impacts to ground water quality, monitoring wells must be properly destroyed after they are no longer needed for monitoring or remediation purposes.

Basis For Finding No. 5: Pursuant to standards for the construction, repair, reconstruction or destruction of water wells are set forth in Chapter II of State Department of Water Resources Bulletin No. 74-81 and Bulletin No. 74-90; Porter-Cologne Water Quality Control Act Section 13267 giving the Regional Board authority to request a technical report describing the monitoring well

destruction report; and San Diego County Code of Regulatory Ordinances, Title 6 Health and Sanitation, Division 7 Water and Water Supplies, Chapter 4. The San Diego County Code of Regulatory Ordinances, Chapter 4 provide for the construction, repair and reconstruction of wells so that the ground water of this County will not be polluted or contaminated and that water obtained from such wells will be suitable for the purpose for which used and will not jeopardize the health, safety or welfare of the people of this County.

This concludes the Technical Analysis Report.
