CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 97-010

SITE CLEANUP REQUIREMENTS FOR:

PARKSIDE PLAZA CLEANERS, INC., KB SAN MATEO, K. ASSOCIATES, BLACK EQUITIES, AND KB PARKSIDE PLAZA INVESTMENT COMPANY

for the property located at

1870 SOUTH NORFOLK STREET
SAN MATEO
SAN MATEO COUNTY

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

1. **Site Location**: The site is located at the Parkside Plaza Shopping Center, 1870 South Norfolk Street in the southeast region of the City of San Mateo, San Mateo County, in the western portion of the San Francisco Bay Area. The site is situated at the northeast corner of the South Norfolk Street-19th Street intersection and at the northern side of the intersection of Highway 101 and Highway 92. The site vicinity is a commercial area.

2. **Site History**: KB San Mateo, K. Associates, Black Equities, and KB Parkside Plaza Investment Company, California general partnerships, purchased this property from Zev Ben Simon and Taldan Investment Company in 1993. Mr. Leroy Burch (deceased 1992) started a dry-cleaning business, "Parkside Plaza Cleaners, Inc." at the subject site in 1956. The dry-cleaning facilities have been upgraded over the years; however, the business name still remains the same and is operational to the present time. The operation of the business includes prespotting, wet-cleaning, dry-cleaning and finishing all wearable garments. Chemicals used at the site includes tetrachloroethene (PCE), methylene chloride, 1,1,1-trichloroethane, chloroform, and various inorganic chemicals.

   Volatile organic compounds releases discovered in soils and groundwater underneath the dry-cleaning facility. KB Management (property manager), on behalf of the property owners, conducted a Phase I site assessment and a limited Phase II

subsurface investigation as part of obtaining new financing for the property in 1995. Initial soil and groundwater samples underneath the dry-cleaning and sump area detected up to 810 ppm and up to 870,000 ppb of total chlorinated VOCs, respectively. The primarily VOCs detected at the site include PCE and its breakdown products such as TCE, cis-1,2-DCE, and vinyl chloride.

3. **Named Dischargers**: Parkside Plaza Cleaners, Inc. is named as discharger based on its chemical usage history in its dry-cleaning business during its occupancy of the site from 1956 to the present and distribution of soil and groundwater contamination at the 1870 South Norfolk Street facility. KB San Mateo, K. Associates, Black Equities, and KB Parkside Plaza Investment Company (California general partnerships) are named as dischargers because they are the current owners of the property.

   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 Board will consider adding that party's name to this order.

4. **Regulatory Status**: This site is currently not subject to Board order.

5. **Site Hydrogeology**: The site hydrogeological formation consists of unconsolidated alluvium deposited by streams draining the Santa Cruz Mountains to the west, which is overlain by estuarine deposits that have formed along the shores of the San Francisco Bay. The subsurface lithology at the site has been described as consisting of about 3 to 4 feet of sandy silt, silty clay, and silty sand fill, with some gravel, extending from the approximate existing ground surface to the underlying blue-gray clay of the Bay Mud encountered at depths of approximately 3 to 4 feet below the ground surface (bgs). The shallow water-bearing zone beneath the site is encountered between 4 to 10 feet bgs. The shallow groundwater flow direction is generally to east and northeast toward Seal Slough (aka Marina Lagoon) and the San Francisco Bay, but local groundwater depths and flow directions may be subject to seasonal fluctuation and/or tidal influences.

6. **Remedial Investigation**: KB Management conducted an environmental site assessment and a limited subsurface investigation in 1995. The preliminary soil and groundwater investigation results revealed high VOC concentrations underneath the subject site. Soil samples detected up to 370 ppm, 300 ppm, and 140 ppm of PCE, TCE and cis-1,2-DCE, respectively. Groundwater samples detected up to 330,000 ppb, 88,000 ppb, 400,000 ppb and 49,000 ppb of PCE, TCE, cis-1,2-DCE and vinyl chloride, respectively. Based on the investigation results, the dry-cleaning facility is the presumed source of the contamination.

   The vertical and lateral extent of the VOC contamination is not delineated, and further site characterization is required for the on-site area. On August 22, 1996, KB Management submitted a workplan for additional soil and groundwater investigation

for the off-site migration of VOCs at the site.

7. **Interim Remedial Measures**: The source area is identified, and a source control measure is necessary while further investigation for full site characterization is underway. Interim remedial measures should be implemented at this site to reduce the threat to water quality, public health, and the environment posed by the discharge of waste and to provide a technical basis for selecting and designing final remedial measures.

8. **Adjacent Sites**: At this point, there is no evidence of VOC releases from adjacent sites.

9. **Basin Plan**: The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on June 21, 1995. This updated and consolidated plan represents the Board's master water quality control planning document. The revised Basin Plan was approved by the State Water Resources Control Board and the Office of Administrative Law on July 20, 1995, and November 13, 1995, respectively. A summary of regulatory provisions is contained in 23 CCR 3912. The Basin Plan defines beneficial uses and water quality objectives for waters of the State, including surface waters and groundwaters.

   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

   At present, there is no known use of groundwater underlying the site for the above purposes.

10. **Other Board Policies**: 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.

    Board Resolution No. 89-39, "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.

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 dischargers 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 cleanup plan. Pending the establishment of site-specific cleanup standards, the following preliminary cleanup goals should be used for these purposes:

    a. Groundwater: Applicable water quality objectives (e.g. maximum contaminant levels, or MCLs) or, in the absence of a chemical-specific objective, risk-based levels (e.g. drinking water equivalent levels).

    b. Soil: 1 mg/kg total volatile organic compounds (VOCs), 10 mg/kg total semi-volatile organic compounds (SVOCs), and background concentrations of metals.

13. **Basis for 13304 Order**: The dischargers have 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 Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the 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.

15. **CEQA**: This action is an order to enforce the laws and regulations administered by the 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 Board has notified the dischargers and all interested agencies and persons of its intent under 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 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 dischargers (or their agents, successors, or assigns) shall cleanup 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. **REMEDIAL INVESTIGATION WORKPLAN**

COMPLIANCE DATE: February 21, 1997

Submit a workplan acceptable to the Executive Officer to define the vertical and lateral extent of soil and groundwater pollution. The workplan should specify investigation methods and a proposed time schedule. Work may be phased to allow the investigation to proceed efficiently.

2. **COMPLETION OF REMEDIAL INVESTIGATION**

COMPLIANCE DATE: July 1, 1997

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task 1 workplan. The technical report should define the vertical and lateral extent of pollution down to concentrations at or below typical cleanup standards for soil and groundwater.

3. **INTERIM REMEDIAL ACTION WORKPLAN**

COMPLIANCE DATE: April 1, 1997

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 should specify a proposed time schedule. Work may be phased to allow the investigation to proceed efficiently. If groundwater extraction is selected as an interim remedial action, then one 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.

4. **COMPLETION OF INTERIM REMEDIAL ACTIONS**

COMPLIANCE DATE: September 30, 1997

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task 3 workplan. For ongoing actions, such as soil vapor extraction or groundwater extraction, the report should document start-up as opposed to completion.

5. **PROPOSED FINAL REMEDIAL ACTIONS AND CLEANUP STANDARDS**

COMPLIANCE DATE: September 30, 1998

Submit a technical report acceptable to the Executive Officer containing:

a. Results of the remedial investigation
b. Evaluation of the installed interim remedial actions
c. Feasibility study evaluating alternative final remedial actions
d. Risk assessment for current and post-cleanup exposures
e. Recommended final remedial actions and cleanup standards
f. Implementation tasks and time schedule

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

Items a through c should 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 Board Resolution No. 92-49 as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under

Water Code Section 13304").

Items a through e should consider the preliminary cleanup goals for soil and groundwater identified in finding 12.

6. **Delayed Compliance**: If the dischargers are delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the dischargers shall promptly notify the Executive Officer and the Board may consider revision to 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 dischargers 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 dischargers shall be liable, pursuant to California Water Code Section 13304, to the Board for all reasonable costs actually incurred by the 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 Board-managed reimbursement program, reimbursement shall be made 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 dischargers shall permit the 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 dischargers.

5. **Self-Monitoring Program**: The dischargers 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, a California certified engineering geologist, or a California registered civil engineer.

7. **Lab Qualifications**: All samples shall be analyzed by State-certified laboratories or laboratories accepted by the 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 Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g. temperature).

8. **Document Distribution**: Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following agencies:

   a. City of San Mateo Fire Department
   b. County of San Mateo Department of Environmental Health Services

   The Executive Officer may modify this distribution list as needed.

9. **Reporting of Changed Owner or Operator**: The dischargers shall file a technical report on any changes in site occupancy or ownership associated with the property described in this Order.

10. **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 dischargers shall report such discharge to the Regional Board by calling (510) 286-1255 during regular office hours (Monday through Friday, 8:00 to 5:00).

    A written report shall be filed with the Board within five working 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.

11. **Periodic SCR Review:** The Board will review this Order periodically and may revise it when necessary. The dischargers may request revisions and upon review the Executive Officer may recommend that the Board revise these requirements.

I, Loretta K. Barsamian, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on January 15, 1997.

Loretta K. Barsamian
Executive Officer

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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

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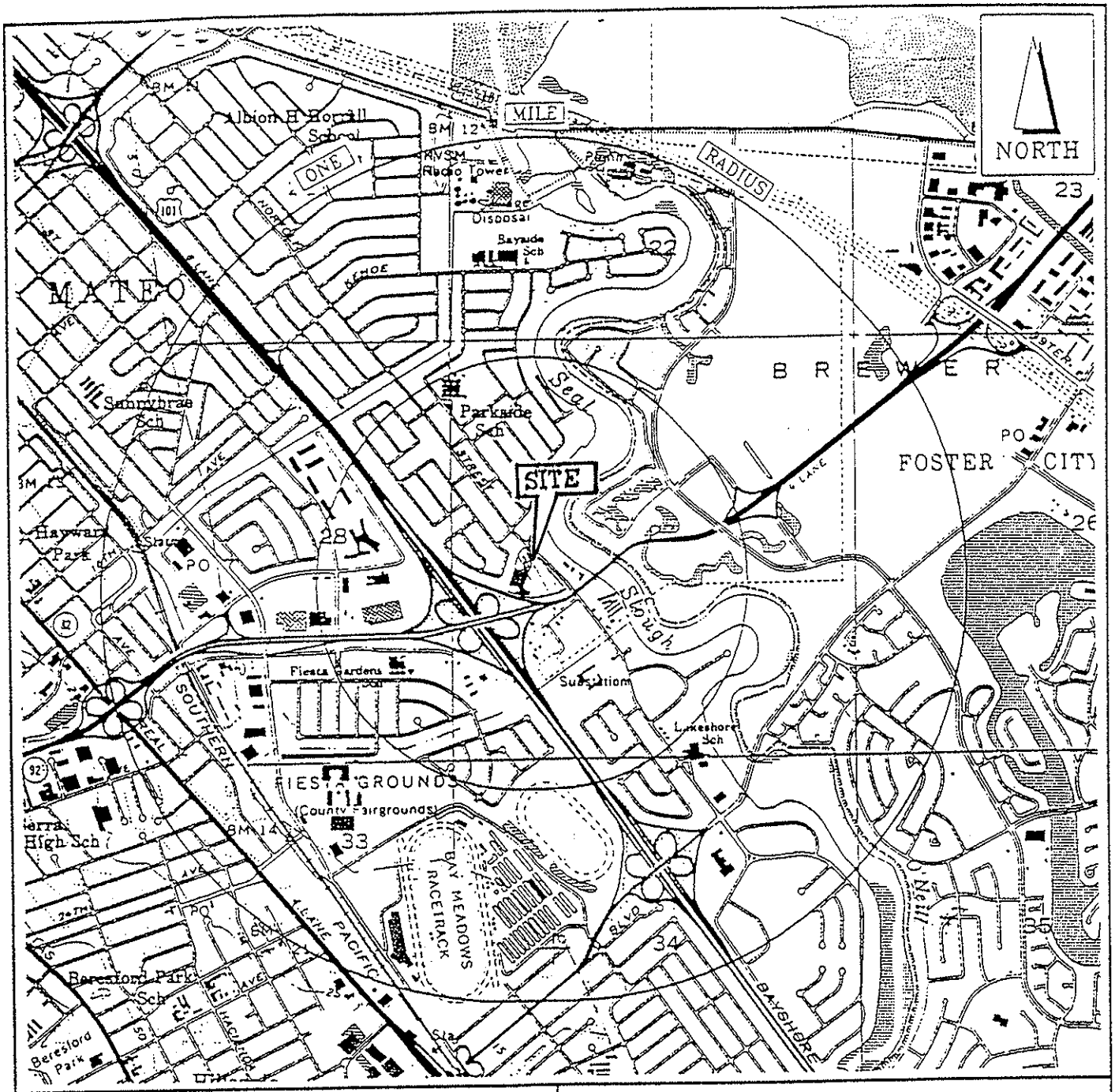
Attachments: Site Map
Self-Monitoring Program



Notes:

1) All locations and dimensions are approximate.

2) Base map from USGS San Mateo Quadrangle (1956) Photorevised 1980, 7.5-Minute Series.

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SCALE (MILES)

APPLIED GEOSCIENCES INC.

Environmental Consultants

SITE LOCATION MAP
PARKSIDE PLAZA
SAN MATEO, CALIFORNIA

PROJECT NO. A953238A | FIGURE 1

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM FOR:

PARKSIDE PLAZA CLEANERS, INC., KB SAN MATEO, K. ASSOCIATES, BLACK EQUITIES, AND KB PARKSIDE PLAZA INVESTMENT COMPANY (CALIFORNIA GENERAL PARTNERSHIPS)

for the property located at

1870 SOUTH NORFOLK STREET
SAN MATEO
SAN MATEO COUNTY

1. **Authority and Purpose**: The 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 Board Order No. 97-010 (site cleanup requirements).

2. **Monitoring**: The dischargers shall measure groundwater elevations quarterly in all monitoring wells, and shall collect and analyze representative samples of groundwater once monitoring wells are installed at the site. The dischargers shall analyze samples using EPA Methods 8010/8020 or equivalent and EPA Method 8240 in lieu of 8010/8020 or equivalent for fourth quarter.

   The dischargers shall sample any new monitoring or extraction wells quarterly and analyze groundwater samples for the same constituents as shown in the above table. The dischargers may propose changes in the above table; any proposed changes are subject to Executive Officer approval.

3. **Quarterly Monitoring Reports**: The dischargers shall submit quarterly monitoring reports to the Board no later than 30 days following the end of the quarter (e.g. report for first quarter of the year due April 30). The first quarterly monitoring report shall be due on April 30, 1997. The reports shall include:

   a. Transmittal Letter: The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct the problem. The letter shall be signed by the dischargers' principal executive officer or their 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.

b. Groundwater Elevations: Groundwater elevation data shall be presented in tabular form, and a groundwater elevation map should be prepared for each monitored water-bearing zone. Historical groundwater elevations shall be included in the fourth quarterly report each year.

c. Groundwater Analyses: Groundwater sampling data shall be presented in tabular form, and an isoconcentration map should be prepared for one or more key contaminants for each monitored water-bearing zone, as appropriate. The report shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical groundwater sampling results shall be included in the fourth quarterly report each year. The report shall describe any significant increases in contaminant concentrations since the last report, and any measures proposed to address the increases. 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 day and mass for the quarter. Historical mass removal results shall be included in the fourth quarterly report each year.

e. Status Report: The quarterly 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 dischargers violate requirements in the Site Cleanup Requirements, then the dischargers shall notify the Board office by telephone as soon as practicable once the dischargers have knowledge of the violation. Board staff may, depending on violation severity, require the dischargers to submit a separate technical report on the violation within five working days of telephone notification.

5. **Other Reports**: The dischargers shall notify the Board in writing 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 dischargers or their 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 make them available to the 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 dischargers. 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.

I, Loretta K. Barsamian, Executive Officer, hereby certify that this Self-Monitoring Program was adopted by the Board on January 15, 1997.

Loretta K. Barsamian
Executive Officer