16 December 2025

Robert Haden
Haden Company, Inc.
2241 N Street
Merced, CA 95340

[TENTATIVE] NOTICE OF APPLICABILITY FOR ORDER NO. R5-2015-0012, WASTE DISCHARGE REQUIREMENTS, GENERAL ORDER FOR IN-SITU GROUNDWATER REMEDIATION AND DISCHARGE OF TREATED GROUNDWATER TO LAND, FORMER DINUBA CLEANERS, TULARE COUNTY, GEOTRACKER GLOBAL ID T10000007303

Provost & Pritchard Consulting Group on behalf of the Haden Company, Inc. (hereafter Discharger) submitted documents that included plans for conducting a groundwater in-situ remediation pilot test. The documents included a *Revised Notice of Intent Application* (Revised NOI) dated 3 June 2025, and a letter dated 11 July 2025 regarding *Contingency Measures for Initial Interim Remedial Measures Pilot Study*. A pilot test is proposed for performing a design verification test (DVT) for evaluating a future permeable reactive barrier (PRB) injection groundwater remedy. The DVT will be performed by injecting potable water into the saturated zone through injection points advanced using a direct-push drill rig. The pilot study PRB injection will involve using a reagent mixture which includes 3-D Microemulsion, sulfidated zero-valent iron, and Bio-Dechlorinoculum. Based on information in the submittals, it is the Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff's (Staff) determination that the proposed discharges are permittable under General Order No. R5-2015-0012 *Waste Discharge Requirements, General Order for In-situ Groundwater Remediation and Discharge of Treated Groundwater to Lan*d (General Order), subject also to the conditions specified below. All of the requirements contained in the General Order are applicable to the proposed pilot test. The proposed pilot test is assigned Order No. **R5-2015-0012-XXXX** (NOA).

Project Location:

The former Dinuba Cleaner is located at 331 East Tulare Street, Dinuba, California 93618 (Site). The proposed pilot test is to be implemented southwest of the Site on K Street.

Project Description:

The Site was used for dry cleaning from 1929 to 1992. Investigations at the Site have identified tetrachloroethene as the key constituent of concern in soil and groundwater.

The DVT will be performed by injecting potable water into the subsurface through injection points that are to be installed using a direct-push drill rig. The injection tests will be carried out using a direct-push injection rig, which will deliver potable water into the subsurface at controlled depths and flow rates at each designated location. The recorded injection rates will help inform the planning of future reagent injections. Additionally, pre-injection groundwater samples will be collected to establish baseline water quality conditions.

As currently proposed, the PRB injections involve using a reagent mixture which includes 3-D Microemulsion (3DME), sulfidated zero-valent iron (SMZVI), and Bio-Dechlorinoculum (BDI). The reagent will be injected at seven injection points near the vicinity of monitoring well MW-7 spaced at 6-foot intervals to form a 40-foot PRB segment. The top depth of the PRB segment will be 90 feet below ground surface (bgs) and the bottom depth of the PRB segment will extend to 115 feet bgs. The total treatment zone volume will be 13,000 cubic feet. The pilot test will consist of injecting 4,527 gallons of 3DME, 166 gallons of SMZVI, 18 liters of BDI, and 6,064 gallons of potable water. Sodium bisulfite, which will also be injected, will be dosed at 60-100 milligrams per liter, and is intended to create anaerobic conditions in the groundwater and will be monitored as a tracer in the nearby wells. The reagent mixture will be injected at a rate of 3-10 gallons per minute with the maximum rate being 20 gallons per minute. Well MW-7 and four proposed performance monitoring wells downgradient of the injection points will be installed to monitor the DVT, including the PRB injections. The injections will be performed using a REGENESIS Inline Blending and Injection System (IBIS). The IBIS system will be used for combining water with remediation reagents to produce a final blended solution for direct application at its discharge or injection points.

Provost & Pritchard Consulting Group staff submitted the *Contingency Measures for Initial Interim Remedial Measures Pilot Study, Former Dinuba Cleaners, SCAP Agreement No. D2210003, Project No. SC003* (Contingency Plan) dated 11 July 2025 to address potential adverse effects. If chemical concentrations in any compliance well exceeds its Water Quality Objective in Table 1 of the Contingency Plan (Attachment H in the Revised NOI) or if a chemical concentration exceeds its background level by 20 percent or more, the Discharger will need to:

- Notify Staff within 48 hours.
- Re-sample at the compliance well with the exceedance within 30 days. If the sampling confirms the exceedance, conduct sampling for three consecutive quarters in the well to evaluate the trend.
- Evaluate the risks/hazards to potential receptors.

- Identify a corrective measure, if warranted, which may include additional sampling of the existing monitoring wells in the network or collecting grab groundwater samples to establish the extent of the exceedance.
- Implement corrective measures.
- Conduct performance monitoring for the selected remedy.

Conditions of Approval:

1. The proposed pilot test will be performed in accordance with the requirements contained in the General Order and in accordance with the information submitted in the *Interim Remedial Measures Work Plan* dated 6 December 2024, Contingency Plan, Revised NOI and specified in this NOA.
2. The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) is remitted until this NOA is officially revoked.
3. Injection of any material other than those specified above into the proposed injection points is prohibited.
4. A Contingency Plan for corrective actions has been submitted should water quality exceed the requirements of this NOA at the points of compliance as required by the General Order. The General Order prohibits concentrations of metals, total dissolved solids, or electrical conductivity more than 20 percent greater than their respective baseline levels. The Discharger will implement one or more of the corrective action measures outlined in the Contingency Plan as deemed necessary by the Central Valley Water Board.
5. Enforcement action as authorized by provisions of the California Water Code could result by failure to abide by the conditions of the General Order.
6. The Discharger complies with the attached Monitoring and Reporting Program No. **R5-2015-0012-XXXX**, and any revisions thereto as ordered by the Executive Officer.

Any changes to the planned pilot testing need to be submitted to Staff for review and approval prior to their implementation. A revised NOA will need to be submitted to Staff and a revised NOA issued prior to implementation of a full-scale PRB remedy.

If you have any questions regarding the information in this letter or regarding the technical aspects of this proposed pilot test, you may contact Michael Pfister, the Central Valley Water Board's project manager, at (559) 444-2418 or michael.pfister@waterboards.ca.gov .

For Patrick Pulupa
Executive Officer

Attachment and ccs Next Page:

Attachment: Monitoring and Reporting Program No. **R5-2015-0012-XXXX**

cc: Tulare County, Environmental Health Department, Tulare
David Norman, Provost and Pritchard Consulting Group, Fresno