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MISSION LINEN SUPPLY

STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

In the Matter of:

MONITORING AND REPORTING
PROGRAM ORDER R3-2008-0027,
REVISED JULY 22, 2026, OF THE
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD CENTRAL
COAST REGION, AND RESPONSE TO
REQUEST FOR NO FURTHER ACTION
DETERMINATION CONCERNING
FORMER AMBASSADOR LAUNDRY, 201
EAST HALEY STREET, SANTA
BARBARA, CALIFORNIA 93101

SWRCB/OCC File No.:

**MISSION LINEN SUPPLY'S PETITION
FOR REVIEW AND REQUEST FOR
STAY; DECLARATION OF DONALD W.
MOORE IN SUPPORT OF REQUEST TO
STAY REGIONAL BOARD'S ORDER;
EXHIBITS**

[Water Code, § 13320]

Pursuant to Water Code section 13320, subdivision (a), and Title 23 of the California Code of Regulations, section 2050, Mission Linen Supply hereby petitions the State Water Resources Control Board ("State Board") for review of revised Monitoring and Reporting Program Order R3-2008-0027, issued by the Central Coast Regional Water Quality Control Board ("Regional Board") on July 22, 2026, and the Regional Board's decision not to grant Petitioner's request for a No Further Action determination for off-Site soil, soil vapor, and groundwater. A copy of the Order is attached to this Petition as **Exhibit 1**. The cover letter to that order is attached as **Exhibit 2**. A copy of the Regional Board's response to the Petitioner's request for a No Further Action determination

1 is attached to this Petition as **Exhibit 3**.

2 **1. Name, Address, Telephone Number, and Email Address of the Petitioner**

3 The Petitioner is Mission Linen Supply (“Mission” or “Petitioner”), 702 East Montecito
4 Street, Santa Barbara, CA 93101. Notices for the Petitioner should be directed to Petitioner’s
5 Counsel:

6 Jan A. Greben
7 Price, Postel & Parma LLP
8 200 E. Carrillo Street, Suite 400
9 Santa Barbara, CA 93101
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10 **2. The Specific Action or Inaction of the Regional Board which the State Board Is**
11 **Requested to Review**

12 Petitioner seeks review of the Regional Board’s revised Monitoring and Reporting Program
13 Order R3-2008-0027 (“Order”), and the Regional Board’s decision not to grant Petitioner’s request
14 for a No Further Action (“NFA”) determination for off-Site soil, soil vapor, and groundwater
15 associated with the Mission property located at 201 East Haley Street in Santa Barbara, California
16 (“the Site”).

17 **3. The Date on which the Regional Board Acted or Refused to Act or on which the**
18 **Regional Board was Requested to Act**

19 The Regional Board issued its Order on July 22, 2026. The Regional Board’s decision not
20 to grant the NFA determination is dated July 22, 2026.

21 **4. A Full and Complete Statement of the Reasons the Action or Failure to Act Was**
22 **Inappropriate or Improper**

23 The Regional Board’s decision not to grant Petitioner’s request for an NFA determination
24 for off-Site soil, soil vapor, and groundwater, and to require continued monitoring and reporting,
25 was inappropriate and improper for three reasons:

26 1. The Regional Board’s decision is inconsistent with its prior site closure determinations
27 in violation of the State Board’s Water Quality Enforcement Policy and does not consider the
28 extensive tetrachloroethene (“PCE”) contamination in groundwater, related to both known and
unknown sources, that has been accepted by the Regional Board as background conditions in the

1 vicinity of the Site.

2 2. The Regional Board's decision is inconsistent with the Assessment Tool for Closure of
3 Low-Threat Chlorinated Solvent Sites prepared by the California Regional Water Quality Control
4 Board, San Francisco Bay Region, on July 31, 2009.

5 3. The Order is inappropriate and improper because the Regional Board is holding Mission
6 responsible for contamination unrelated to Mission and failing to name known responsible parties,
7 including the City of Santa Barbara.

8 Petitioner's Statement of Points and Authorities in Section 7 below is incorporated herein
9 by reference, and includes citations to facts and law demonstrating that the Regional Board's action
10 was inappropriate and improper.

11 **5. The Manner in which the Petitioner is Aggrieved**

12 By (1) improperly naming Petitioner as the responsible party for the technical reporting
13 requirements of Water Code section 13267; (2) not acknowledging existing groundwater conditions
14 that it has accepted related to prior site closures; and (3) not adhering to the Assessment Tool for
15 Closure of Low-Threat Chlorinated Solvent Sites prepared by the California Regional Water
16 Quality Control Board, San Francisco Bay Region, on July 31, 2009, the Regional Board
17 improperly requires Petitioner to incur extensive costs responding to the Order. The financial
18 burden will have a severe impact on Petitioner.

19 **6. The Specific Action by the State or Regional Board which Petitioner Requests**

20 Petitioner requests the following actions by the State Board:

21 1. That the State Board rescind revised Monitoring and Reporting Program Order R3-2008-
22 0027, issued by the Regional Board on July 22, 2026.

23 2. That the State Board issue a formal NFA determination for off-Site soil, soil vapor, and
24 groundwater, and approve destruction of all groundwater monitoring wells proposed in Petitioner's
25 NFA request.

26 3. That the State Board designate the utility corridor in the Garden Street area with the
27 heavily damaged City of Santa Barbara sewers and other utilities with transmissive backfill material
28 that acts as a preferential pathway for non-Mission volatile organic compounds ("VOCs") a separate

1 Site Cleanup Program case with the City of Santa Barbara and upgradient dischargers as responsible
2 parties.

3 **7. A Statement of Points and Authorities in Support of Legal Issues Raised in the Petition**

4 **A. Factual Background**

5 Work conducted at Mission's the former Ambassador Laundry facility, located at 201 East
6 Haley Street, Santa Barbara, California ("the Site") and downgradient areas has been performed
7 under the oversight of the Regional Board for nearly 40 years, at a cost of more than \$10 million.
8 PCE and VOC impacts to groundwater underlying the Site are a result of former dry-cleaning
9 operations at the Site. Site investigations began in 1985 when groundwater samples collected from
10 Upper Producing Zone water supply wells were found to contain PCE. Remedial actions to mitigate
11 Site-related VOC impacts were initiated in 1988 and are continuing today in on-Site areas.
12 Remedial actions have eliminated or significantly reduced VOC concentrations in groundwater
13 such that current and future unacceptable risks to human health, ecological health, and sensitive
14 receptors have been mitigated.

15 Detailed technical reports and related Regional Board correspondence summarizing nearly
16 40 years of assessment, remedial and mitigation actions, monitoring and related technical
17 evaluation are available through the Geotracker website at:
18 https://geotracker.waterboards.ca.gov/profile_report?global_id=SL203061244.

19 The Site is located in downtown Santa Barbara in an area with numerous non-Petitioner
20 PCE and VOC sources in up-, cross-, and down-gradient areas relative to the Site. Additionally, a
21 heavily damaged sewer system beneath Garden Street operated by the City of Santa Barbara is
22 present near the termination of the dissolved phase plume. The sewer system and up-sewer flow
23 PCE dischargers have distributed non-Petitioner PCE along the sewer system and related utility
24 corridor that provides a preferential pathway for spreading and exacerbating the PCE
25 contamination. Additionally, an upgradient, unknown PCE source in shallow water-bearing zone
26 SZ3 has been contributing to PCE impacts beneath the Site for at least 30 years. Petitioner's
27 extensive remedial and mitigation efforts over more than 35 years have reduced Petitioner-related
28 VOCs to levels below or similar to the residual non-Petitioner VOC impacts in the area.

1 On January 13, 2026, Petitioner submitted a low-threat closure evaluation and off-Site NFA
2 request (“NFA Request”) to the Regional Board that was prepared by Apex Companies, LLC
3 (“Apex”) and is attached to this Petition as **Exhibit 4**. The results of the low-threat closure
4 evaluation indicated that additional work is warranted in limited on-Site areas to meet the criteria
5 set forth in the Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites prepared by
6 the California Regional Water Quality Control Board, San Francisco Bay Region, on July 31, 2009
7 (“LTC Guidance”); however, all Petitioner-related off-Site VOC impacts meet the LTC Guidance
8 criteria and no longer pose an unacceptable risk to human health or water resources.

9 On July 22, 2026, the Regional Board informed Petitioner that an NFA determination for
10 off-Site soil, soil vapor, and groundwater is premature. The Regional Board also issued a revised
11 Monitoring and Reporting Program Order R3-2008-0027 (“Order”) in response to Petitioner’s NFA
12 Request. The Order was issued pursuant to Water Code section 13267. (**Exhibit 1** at p. 4.)

13 **B. Standard of Review**

14 The State Board is not subject to the exact standards which bind a court. Water Code
15 Section 13320, which provides for State Board review of Regional Board action sets
16 forth a standard of review which is different from ordinary judicial review in two
17 important ways. First, under Section 13320(b) the State Board shall consider both
18 the Regional Board record and “any other relevant evidence” which it wishes in
19 reviewing the order. Second, if the State Board decides the Regional Board action
20 is “inappropriate or improper”, the State Board has several options, including
21 remanding or reversing the Regional Board or taking the appropriate action itself.
22 The scope of review thus appears to be closer to that of independent review.

23 However, any findings made by an administrative agency in support of an action
24 must be based on substantial evidence in the record. (See, e.g. *Topanga Association*
25 *for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 113
26 Cal.Rptr. 836.)

27 (*In the Matter of the Petition of Exxon Company, U.S.A., et al.*, SWQCB Order No. WQ 85-7
28 (August 22, 1985), 1985 WL 20026, at *6; See also *In the Matter of the Petition of the Department*
of Fish and Game For Review of Action of the California Regional Water Quality Control Board,
Central Valley Region, Regarding Discharge of Wastewater By Pacific Mine To The North Fork
of the Middle Fork of the American River, SWQCB Order No. WQ 80-1 (June 5, 1980), 1980 WL
590835, at *6 (“Water Code § 13320 clearly indicates that we are to exercise an independent review

1 of Regional Board actions and that we can consider any relevant evidence necessary to effectuate
2 and implement the policies of the State’s water quality laws.”.)

3 **C. Action on Petition**

4 (a) The state board may:

5 (1) At any time, refuse to review the action or failure to act of the regional board if
6 the petition fails to raise substantial issues that are appropriate for review, or

7 (2) After review of all or part of the regional board’s records pertaining to the matter,
8 including the transcript of any hearing held by the regional board:

9 (A) Deny the petition upon a finding that the action or failure to act of the regional
10 board was appropriate and proper or that the petition fails to raise substantial issues
11 that are appropriate for review; or

12 (B) Set aside or modify the regional board order; or

13 (C) Direct the regional board to take appropriate action.

(Cal. Code Regs., tit. 23, § 2052(a); see also Wat. Code, § 13320(c).)

14 **D. Analysis**

- 15 **i. The Regional Board’s decision is inconsistent with its prior site closure**
16 **determinations in violation of the State Board’s Water Quality Enforcement**
17 **Policy and does not consider the extensive PCE contamination in**
18 **groundwater, related to both known and unknown sources, that has been**
19 **accepted by the Regional Board as background conditions in the vicinity of**
20 **the Site.**

21 The State Board’s Water Quality Enforcement Policy requires fair, firm, consistent, and
22 transparent enforcement. It recognizes that formal enforcement should be used as a tool to maintain
23 a level-playing field for those who comply with their regulatory obligations. It also recognizes the
24 need to provide consistent treatment for violations that are similar in nature and have similar water
25 quality impacts.

26 In 2013, Environmental Risk Solutions, Inc. (“ERS”) prepared a summary of off-Site
27 properties with known PCE and VOC contamination located in an up- or cross-gradient
28 groundwater flow direction relative to the Site. (**Exhibit 4** at Figure 5 & Appendix A.) The
summary included information obtained from the Regional Board’s Geotracker database and hard
copy files reviewed at the Regional Board’s office in April 2012. The purpose of the summary was

1 to evaluate: (1) PCE impacts at nearby properties relative to the Section 5.5 Background Evaluation
2 included in the URS Corrective Action Plan dated August 2010; and, (2) criteria used by the
3 Regional Board and other agencies for issuing closure to other PCE and VOC impacted properties
4 in the vicinity of the Site. Six confirmed PCE impacted properties within 600 feet of the Site were
5 identified and described in the ERS 2013 summary. A review of the Geotracker database in 2025
6 yielded five additional properties with known PCE impacts that are likely current or past
7 dischargers of PCE into the City of Santa Barbara sewer system, in an up-flow direction relative to
8 the Garden Street sewer between East Cota and East Haley Streets. (See **Exhibit 4** at Section 3.1.)
9 The Regional Board closed: (1) 221 East Gutierrez Street; (2) 401 Santa Barbara Street; (3) 104
10 East Haley Street; (4) 526 Anacapa Street; and (5) 201 East Figueroa Street. These closed sites had
11 PCE impacts similar to or much higher than the Site at the time of their closure by the Regional
12 Board. (**Exhibit 4** at Figure 5 & Appendix A.)

13 The Regional Board's response to Petitioner's NFA Request fails to recognize the PCE and
14 VOC background levels that they have approved and accepted in the vicinity of the Site, even
15 though all of this information is available in its Geotracker database. This includes the nearby 104
16 East Haley property with more than 500 ug/L in groundwater at the time of closure, where the
17 Regional Board attributed these impacts to a regional PCE groundwater plume. (See **Exhibit 4** at
18 Appendix A.) The Regional Board is not being equitable with its past closure determinations or
19 acknowledging existing PCE background concentrations in groundwater from both known and
20 unknown sources.

21 Petitioner is requesting that the State Board consider an updated ERS technical
22 memorandum that was prepared in support of this Petition, and that was not presented to the
23 Regional Board. It is attached as **Exhibit 5** to this Petition. This ERS update, using only information
24 available in the public record from the Regional Board's Geotracker website, supplements and
25 expands on the prior ERS submittal to the Regional Board dated May 3, 2013, which is attached as
26 Appendix A to **Exhibit 4**, Petitioner's NFA Request. The Regional Board closed numerous VOC
27 and Leaking Underground Storage Tank (LUST) sites with PCE and other VOC concentrations
28 ranging from about 20 ug/L to more than 100 ug/L between about 1990 and 2010 that are in the

1 immediate vicinity and in the nearby downtown area relative to the Site. Based on these site closures
2 by the Regional Board, these PCE concentrations represent background levels that are known to
3 and have been acceptable to the Regional Board. Examples of PCE impacts at sites closed by the
4 Regional Board or known PCE conditions that have not been addressed by the Regional Board
5 include:

- 6
7 • The Regional Board closed the former Tidewater Marine facility at 104 East Haley
8 Street in 1996 with 510 ug/L of PCE in groundwater and attributed it to “regional
9 groundwater contamination” with no further investigation despite referencing
10 investigation data gaps and a solvent parts washer that was located on this property.
11 This site is located ~400 feet in an up- to- cross gradient relative to the Site.
12
- 13 • The Regional Board closed the Paseo Nuevo Mall (651 Paseo Nuevo at State Street)
14 in 2002 with more than 100 ug/L of PCE in groundwater in two on-Site monitoring
15 wells with limited sampling in 1988 and 1989 that was attributed to off-site sources.
16 This site is located ~1,500 feet up-gradient of the Site.
17
- 18 • The Regional Board closed the 401 Santa Barbara Street LUST site in 1990 with 79
19 ug/L of PCE in groundwater. This site is located ~300 feet cross-gradient from the
20 Site.
21
- 22 • The Regional Board closed the former GTE VOC site located at 221 E. Gutierrez
23 Street in 2001 with 49 ug/L of PCE in groundwater. This site is located ~300 feet
24 cross-gradient of the Site.
25
- 26 • The Regional Board closed the Sanchez Property LUST site located at 526 Anacapa
27 Street in 2010 with 21 ug/L of PCE in groundwater. This site is located ~400 feet
28 upgradient of the Site.

- A 2002 ATC Associates, Inc. report related to the Paseo Nuevo Mall development project, in an effort to support their statement of “City-wide PCE impacted groundwater,” identified 15 sites with PCE concentrations in groundwater above 18 ug/L on a list of 60 sites with known or potential VOC contamination in the vicinity of the Site and nearby areas. These are more examples that can be added to the list above.
- It’s not clear that the Regional Board ever followed up on investigating the Star Rug Cleaners site located at 26 East Cota Street that was reportedly illegally discharging liquid wastes into a planter. The site is located ~400 feet upgradient of the Site.
- As stated in Petitioner’s NFA Request (**Exhibit 4** at Section 3.1), there is “clear evidence of an upgradient, off-Site unknown source that has been contributing PCE to SZ3 groundwater beneath the Site since the early 1990s ranging from 16 to 24 µg/L based on data at SZ-3 well 41-02 located at Vera Cruz Park.” This is additional evidence of the PCE background levels that have been acceptable to the Regional Board dating back to the 1990s.

(Exhibit 5.)

Petitioner has reduced its PCE levels to well within the PCE background levels for this area established by prior Regional Board closure determinations and unknown sources. In order to comply with its policy of fair and consistent enforcement, the State Board must either issue an off-Site NFA determination to Petitioner and approve destruction of all wells proposed in its NFA Request, or reopen and investigate numerous closed sites with PCE levels much higher than can be attributed to the Site.

ii. The Regional Board’s decision is inconsistent with the Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites.

At considerable expense and effort, Petitioner contracted with Apex to conduct a low-threat

1 closure evaluation in accordance with the LTC Guidance. The LTC Guidance was designed to close
2 sites that pose minimal threat to human and ecological health, water quality, and beneficial uses,
3 but do not yet meet cleanup standards at all locations. The LTC Guidance is based on the
4 understanding that cleanup standards can be met under natural conditions within a reasonable
5 timeframe once adequate source control and plume remediation are complete. The LTC Guidance
6 includes nine narrative criteria which need to be addressed prior to Site closure. Based on this
7 evaluation, no further action was requested for all off-Site areas as the groundwater and soil vapor
8 conditions meet the LTC Guidance criteria for VOCs. (See **Exhibit 4** at Section 4.) Within the off-
9 Site dissolved phase plume, a review of the historical data set indicates that remediation has been
10 performed to the extent feasible and practicable with the best available technologies available at the
11 time in consultation with and with approval from the Regional Board. The Site has already been
12 progressing in this direction with the Regional Board approving destruction of twenty-two
13 groundwater monitoring wells and two vapor probes in 2022 and 2024 that were primarily located
14 in off-Site areas. Targeted groundwater and soil vapor remedial actions and/or monitoring are still
15 warranted in limited on-Site areas. (See **Exhibit 4** at Section 4.)

16 The Regional Board's response to Petitioner's NFA Request states:

17 Abandonment of the full list of wells proposed in the Closure Evaluation is not
18 appropriate at this time. This is because there are numerous wells proposed for
19 destruction that still demonstrate elevated, increasing, or unstable concentrations of
20 VOCs. These trends are supported in the Monitoring and Remediation Optimization
21 Software (MAROS) analysis included in Table 3.

22 Abandonment of proposed off-Site vadose zone monitoring infrastructure is
23 appropriate if it is understood that these monitoring points are no longer needed for
24 SVE operation and performance monitoring. SG-13 must not be destroyed so that it
25 may be available for future sampling to monitor observed rebound. HSVE06 must
26 also not be destroyed until the SVE system is completely finished operating. The
27 reason for this is to preserve the option of operation at this point should it be
28 necessary.

25 (**Exhibit 3** at p. 4.)

26 Instead of evaluating risk and the multiple lines of evidence, the Regional Board "cherry
27 picked" one line of evidence, the MAROS statistical analysis, as its basis for requiring Petitioner
28 to continue monitoring 25 wells. The Regional Board also misunderstood the significance of the

1 MAROS analysis included in Table 3. As explained in Apex’s evaluation: “As shown in Table 3,
2 some of the well locations evaluated are flagged with ‘Probably Increasing’ or ‘Increasing’ trends;
3 however, these increases are largely related to dechlorination or have low detections, many of which
4 are below the MCL.” (**Exhibit 4** at Section 4.3.1.) Additionally, the Regional Board failed to
5 recognize that the MAROS analysis was only one line of evidence conducted over a limited, post-
6 remediation timeframe, meaning that it did not capture the significant PCE and VOC reductions
7 realized based on Petitioner’s multiple phases of remediation from 1988 through 2014.

8 Apex prepared a technical memorandum attached to this Petition as **Exhibit 6** to show that
9 the Regional Board did not evaluate its off-Site NFA Request prepared on behalf of the Petitioner
10 in accordance with the LTC Guidance. Petitioner is requesting that the State Board consider **Exhibit**
11 **6** even though it was not presented to the Regional Board. Apex concluded that the Regional Board
12 focused on only one line of evidence rather than evaluating all nine narrative criteria included in
13 the LTC Guidance. The Regional Board also failed to recognize that the context of the one line of
14 evidence they evaluated was a limited, post-remediation dataset. Consideration of the full ~35-year
15 dataset as presented in **Exhibit 6** provides the appropriate context for interpreting the statistical
16 analysis provided in the NFA Request. Statistical analysis of the full data set demonstrates an
17 overall collapsing plume and decreasing concentration trends over time.

18 **iii. The Order is inappropriate and improper because the Regional Board is**
19 **holding Petitioner responsible for contamination unrelated to Petitioner and**
20 **failing to name known responsible parties, including the City of Santa**
21 **Barbara.**

22 Through multiple lines of evidence developed by Petitioner between 2021 and 2025 at the
23 request of the Regional Board, it is clear that the responsible parties for current VOC impacts within
24 and along the utility corridor beneath Garden Street are (1) the City of Santa Barbara based on its
25 heavily damaged sewer lines and (2) numerous known and potential up-flow PCE dischargers into
26 the City sewers. (**Exhibit 4** at Appendix B; see also **Exhibit 6**.)

27 There is no evidence that suggests any of the PCE impacts at any well in the Garden Street
28 area other than well 62-01 were ever related to Petitioner as they were out of the groundwater flow
path from the Site. Prior to the sewer-related spikes in VOC concentrations that started in 2015,

1 Petitioner-related PCE impacts ranged from about 10 to 30 µg/L. Based on the overwhelming non-
2 Petitioner VOC impacts that have impacted that location over the past 10 years in conjunction with
3 the preferential pathway utility corridor, it is unclear if any Petitioner-related impacts remain in that
4 area. Further, the wells in the Garden Street area are located north and adjacent to the heavily
5 damaged City of Santa Barbara sewer lines and a preferential pathway utility corridor that is at least
6 12 feet in depth. In the absence of the sewer-related discharges, if any Petitioner-related PCE still
7 remained in the 10 to 30 µg/L range at well 62-01, those levels would meet the LTC Guidance
8 criteria. (See **Exhibit 4** at Section 3.3.)

9 In the Regional Board’s response to Petitioner’s off-Site NFA Request, the Regional Board
10 explained that it did not agree with Petitioner’s position regarding residual VOCs in groundwater
11 from the Garden Street area:

12 Groundwater data from the Garden Street area show elevated concentrations of
13 VOCs, including tetrachloroethene (PCE). Previous communications from Mission
14 Linen Supply have asserted a position that there are additional sources contributing
15 to these concentrations of VOCs in groundwater and that the sewer has created a
16 conduit to allow for the migration of VOCs. To the extent to which additional
17 sources are found or confirmed, the VOC plume would be considered commingled;
18 therefore, Mission is still considered responsible for the impacts in this area.

19 The Central Coast Water Board is in communication with the City of Santa Barbara
20 to improve conditions of sewer lines in the Garden Street area and will evaluate if
21 repairs will affect PCE concentrations in groundwater in the area. Continued
22 monitoring to document VOC trends (including the potential decrease) is required
23 per Monitoring and Reporting Program (MRP) No. R3-2008-0027. If concentrations
24 attenuate, monitoring data could support the argument that active remediation might
25 not be warranted in this area.

26 (See **Exhibit 3** at p. 3.) The Regional Board refused to make an NFA determination for off-Site
27 soil, soil vapor, and groundwater in part because of VOCs in groundwater in the Garden Street area.
28 (**Exhibit 3** at p. 3.) Over the past five years, the Regional Board has never disputed the technical
positions and facts established and presented by Apex and the Mission team with respect to this
area. (**Exhibit 4**, Section 3.3.) The Regional Board’s position regarding “commingled”
contamination is unsupported by any technical response, has been refuted by the Mission team, and
appears to be the Regional Board’s attempt to “keep Mission on the hook” rather than pursuing the
actual responsible parties.

1 The Order was issued pursuant to Water Code section 13267. This section provides the
2 Regional Board with authority to require a suspected discharger to submit technical or monitoring
3 reports, studies, or other information needed to investigate a discharge. In contrast, a cleanup and
4 abatement order is issued pursuant to Water Code section 13304. This section provides the Regional
5 Board with authority to require a discharger to clean up and abate waste where they caused or
6 permitted waste to be discharged into waters of the State. Cleanup and abatement orders are
7 sometimes combined with 13267 authority.

8 Water Code section 13304, subdivision (d), requires the Regional Board to make
9 “reasonable efforts . . . to identify the person responsible for the discharge of waste or the condition
10 of pollution or nuisance” In the context of cleanup and abatement orders issued pursuant to
11 Water Code section 13304, the State Board has a well-settled policy of naming all parties for which
12 there is reasonable evidence of responsibility. (See *In the Matter of the Petition of Exxon Company,*
13 *U.S.A., et al.*, SWQCB Order No. WQ 85-7 (August 22, 1985), 1985 WL 20026, at *6 (“Generally
14 speaking it is appropriate and responsible for a Regional Board to name all parties for which there
15 is reasonable evidence of responsibility, even in cases of disputed responsibility.”); *In the Matter*
16 *of the Petition of U.S. Cellulose and Louis J. and Shirley D. Smith*, SWQCB Order No. WQ 92-04
17 (March 19, 1992), 1992 WL 12622776, at *2 (“In cases involving several potentially responsible
18 parties, it is appropriate to name in cleanup orders all parties for which there is reasonable evidence
19 of responsibility.”).) The reason for this policy is clear. “[F]ewer parties named in an order may
20 well mean no one is able to clean up a demonstrated water quality problem. To the extent possible,
21 [the State Board] believe[s] that multiple parties should properly be named in cases of disputed
22 responsibility.” (*In the Matter of the Petition of Stinnes-Western Chemical Corporation*, SWQCB
23 Order No. WQ 86-16 (September 18, 1986), 986 WL 25523, at *6; see also *In the Matter of the*
24 *Petition of Stinnes-Western Chemical Corporation*, SWQCB Order No. WQ 86-16 (September 18,
25 1986), 1986 WL 25523, at *6 (“As we discussed in *Exxon*, fewer parties named in an order may
26 well mean no one is able to clean up a demonstrated water quality problem. To the extent possible,
27 we believe that multiple parties should properly be named in cases of disputed responsibility.”); *In*
28 *the Matter of the Petition of Mehdi Mohammadian*, SWQCB Order No. WQO 2002-0021

(November 19, 2002), 2002 WL 31694368, at *6 (“[O]ur well-established policy of ensuring that, when there is reasonable evidence of responsibility, multiple parties be named in order to promote cleanup of a demonstrated water quality problem.”).) “Moreover, a balancing of the equities dictates that, whenever possible, a responsible party should not be left to clean up constituents attributable to a different release for which that party is not responsible.” (*In the Matter of the Petition of Mehdi Mohammadian*, SWQCB Order No. WQO 2002-0021 (November 19, 2002), 2002 WL 31694368, at *6.)

Pursuant to regulations adopted by the State Board, it is clear that this duty to identify and name all dischargers applies to monitoring and reporting orders issued pursuant to Water Code section 13267. Title 23, section 2907 of the California Code of Regulations provides, in relevant part:

I. The procedures Regional Water Boards shall implement in making decisions as to when a person may be required to undertake an investigation related to a discharge or threat of a discharge subject to WC § 13304.

The Regional Water Board shall:

- Use any relevant evidence to identify dischargers;
- Make reasonable efforts to identify dischargers;
- Require identified dischargers to investigate; and
- Coordinate with other agencies.

II. The policies Regional Water Boards shall apply in overseeing: (a) investigations to determine the nature and horizontal and vertical extent of a discharge and (b) appropriate cleanup and abatement measures.

The Regional Water Board shall:

- Require a progressive sequence: site assessment; investigation (soil and water); cleanup and abatement action development; cleanup and abatement action; and effectiveness verification;
- Approve concurrent action under site-specific circumstances; emergency, imminent threat, protracted investigation causing delay, and small discharges which can be cleaned up quickly;
- Require cleanup and abatement of all affected locations;
- Name other dischargers as permitted by law;

- Require adequate workplans;
- Review and approve workplans as practicable;
- Require documentation of activities;
- Require reliance on qualified professionals;
- Prescribe consistent standards for similar circumstances; and
- Identify activities that do not require supervision.

Accordingly, the State Board should designate the utility corridor in the Garden Street area with the heavily damaged City of Santa Barbara sewers and related VOCs a separate Site Cleanup Program case with the City of Santa Barbara and upgradient dischargers as responsible parties pursuant to any 13267 or 13304 order.

8. A Statement that the Petition Has Been Sent to the Appropriate Regional Board and to the Discharger, if not the Petitioner

A copy of this Petition was sent to the Regional Board by email to:

centralcoast@waterboards.ca.gov

daniel.pelikan@waterboards.ca.gov

greg.bishop@waterboards.ca.gov

9. A Statement that the Substantive Issues or Objections Raised in the Petition Were Raised Before the Regional Board, or an Explanation of Why the Petitioner Was Not Required or Was Unable to Raise these Substantive Issues or Objections Before the Regional Board

Petitioner raised before the Regional Board the substantive issues and objections raised in this Petition, as reflected in the low-threat closure evaluation and off-site no further action request submitted to the Regional Board and attached as **Exhibit 4** to this Petition.

10. Request that the State Board Consider Evidence Not Previously Provided to the Regional Board

Pursuant to 23 CCR § 2050.6, Petitioner requests that State Board consider additional evidence that provides a technical response to the Regional Board's July 22, 2026 actions that are presented for review in this Petition. Specifically, Petitioner requests that the State Board consider **Exhibit 5** and **Exhibit 6**, which are attached to this Petition. These exhibits are based on

1 information from the Regional Board's Geotracker database.

- 2 • **Exhibit 5** is a technical memorandum that supplements and expands on the ERS
3 submittal to the Regional Board dated May 3, 2013, which is attached as Appendix
4 A to the low-threat closure evaluation and off-Site NFA Request submitted to the
5 Regional Board and attached as **Exhibit 4** to this Petition. It provides additional
6 details regarding sites closed by the Regional Board that further demonstrate that
7 Petitioner's Site is being held to a higher standard than other sites in the area.
- 8 • **Exhibit 6** is a technical memorandum explaining how the Regional Board failed to
9 follow the LTC Guidance criteria and how it misunderstood the context of the
10 MAROS statistical analysis.

11 Because **Exhibit 5** and **Exhibit 6** are responsive to the technical conclusions of the Regional Board,
12 they will assist the State Board in evaluating the legal arguments presented in this Petition.
13 Petitioner therefore requests that the State Board consider **Exhibit 5** and **Exhibit 6** in taking action
14 on this Petition.

15 **11. Request for Stay Pursuant to 23 CCR § 2053**

16 Pursuant to 23 CCR § 2053, Petitioner requests that the State Board stay the Order issued
17 by the Regional Board on July 22, 2026. There is good cause for the stay based on the totality of
18 the circumstances when the factors are taken together. This request is supported by the declaration
19 of Donald W. Moore, as well as the Exhibits to this Petition.

20 **(1) There will be substantial harm to Petitioner if a stay is not granted.**

21 The Order requires Petitioner to expend a considerable amount of money to monitor and
22 report VOC levels in an area where it has demonstrated that the contamination is the responsibility
23 of other parties, including the City of Santa Barbara and numerous known and potential up-flow
24 PCE dischargers into the City's sewers. This is a substantial harm to Petitioner, which has already
25 spent more than \$10 million in investigating, remediating, and monitoring the contamination for
26 which it was responsible, and is now being placed at a competitive disadvantage by being treated
27 inconsistently with other dischargers in the area.

(2) There is a lack of substantial harm to other interested persons and to the public interest if a stay is granted.

Petitioner has no ability to control contamination for which it is not responsible. Therefore, requiring Petitioner to monitor that contamination serves no useful purpose. The first step in protecting water quality is for the State Board or the Regional Board to order the City of Santa Barbara to fix its sewers.

(3) There are substantial questions of fact and law regarding the disputed action.

As described in the Statement of Points and Authorities in Section 7 of this Petition, the Regional Board failed to follow well-settled law and policy, and misinterpreted and ignored facts in issuing the Order and denying the request for an off-Site NFA determination.

Therefore, given the totality of the circumstances as to the factors above, a stay is proper to prevent substantial harm to Petitioner. The State Board should grant the request.

Respectfully submitted,

Dated: August 19, 2026

PRICE, POSTEL & PARMA LLP

By: 
 JAN A. GREBEN
 LINA F. SOMAIT
 ERIK B. MATHISON
 Attorneys for Petitioner
 MISSION LINEN SUPPLY

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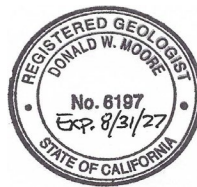
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background conditions in the vicinity of the Site.

5. As described in the Point and Authorities in Section 7 of the Petition, the Regional Board failed to follow well-settled law and policy, and misinterpreted and ignored facts in issuing the Order and denying the request for an off-Site NFA determination.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 19th day of August 2026 in San Francisco, California.



W. J. Mann

Donald W. Moore, PG

EXHIBIT 1

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

**MONITORING AND REPORTING PROGRAM ORDER R3-2008-0027
*Revised July 22, 2026***

**CONCERNING
FORMER AMBASSADOR LAUNDRY
201 EAST HALEY STREET, SANTA BARBARA
SANTA BARBARA COUNTY**

GROUNDWATER MONITORING

This Monitoring and Reporting Program (MRP) is issued to Mission Linen Supply (Mission) and applies to groundwater monitoring and reporting at the former Ambassador Laundry site located at 201 East Haley Street, Santa Barbara, California.

Mission must retain a qualified person, trained in proper procedures for collecting representative samples to be analyzed for volatile organic compounds (VOCs). Mission must submit requests for changes in monitoring frequency and analyte analysis in writing for Water Board staff review and Executive Officer approval. These requests must receive Executive Officer approval prior to implementation.

Mission must incorporate all new monitoring wells immediately into the sampling schedule following well completion and development activities and place the wells on an appropriate monitoring schedule, as approved by the Executive Officer. The location and reference point elevation for each monitoring well must be surveyed using conventional survey methods or a global positioning system survey.

Sampling Frequency

Mission must analyze groundwater samples from the following groundwater monitoring wells as described in Table 1 (attached). The first quarter is from January to March and the third quarter is from July to September of each calendar year.

Monitoring Parameters

Mission must measure depth to groundwater (to 0.01-foot accuracy) in each monitoring well semiannually before sampling. Depth-to-groundwater must also be measured semiannually in the Upper Producing Zone (UPZ) monitoring wells.

In wells to be sampled using purge methods, Mission must purge until measurements of these parameters have stabilized in the field: temperature, pH, specific conductance, turbidity, and dissolved oxygen. Mission must collect groundwater samples from each well after the groundwater level in the well has recovered sufficiently to ensure the collection of representative groundwater samples. In wells sampled using passive diffusion bags (PDBs), Mission shall not purge the well. Mission must stage PDBs within the screened interval of each well a minimum of two weeks prior to sample

collection. For sampling, Mission will remove PDBs from the well and Mission will collect the sample directly from the PDB.

At a minimum, Mission must analyze groundwater samples for tetrachloroethene (PCE), trichloroethene, *cis*-1,2-dichloroethene, *trans*-1,2-dichloroethene, 1,1-dichloroethene, vinyl chloride, and other standard VOCs using USEPA Method 8260B. A summary of monitoring parameters and detection limits are included below.

Table 2. Monitoring Parameters

Compound	Units	Sample Type	EPA Method ^a	Practical Quantitation Limit
Water Elevation	Feet	Measured	n/a	n/a
VOCs	micrograms/liter (µg/L)	Grab	8260B	0.5

a. Alternative laboratory methods may be used, with the Executive Officer's prior approval, provided that they produce data with detection limits, precision, and accuracy that are equal to or better than data produced by the referenced methods for identical sample matrices.

A laboratory certified for analyses by the Environmental Laboratory Accreditation Program (ELAP) or laboratories approved by the Executive Officer must conduct the analyses. Unless otherwise noted, all sampling, sample preservation, and analyses must be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, United States Environmental Protection Agency, and analyzed as specified herein by the analytical methods and detection limits indicated herein.

REPORTING

Mission must submit monitoring reports semiannually by the following due dates for the two sampling periods.

Table 3. Reporting Dates

REPORT	SAMPLING PERIOD	DUE DATE
1 st Semiannual	January through March	April 20
2 nd Semiannual	July through September	October 20

The monitoring reports shall include:

1. Results of field and laboratory sampling required by this program in tabular form. Tables presenting analytical data shall indicate the analytical method(s) used.
2. A table with well completion information, including top of well casing elevation, total depth, and screen interval with respect to both mean sea level and ground surface for all monitoring wells.

3. A table of vertical gradients calculated from monitoring well clusters across each adjacent aquifer zone.
4. Scaled maps showing the site and the locations of all monitoring wells.
5. Maps showing calculated potentiometric elevations at each monitoring well and interpreted potentiometric surfaces for Shallow Zones 1 through 4 and the UPZ.
6. All previous data in tabular form to allow comparison of historic data.
7. An evaluation and interpretation of all available data, including PCE concentration versus time graphs for selected performance monitoring wells.
8. An evaluation of the cleanup effort and recommendations for further work (i.e. identification of possible data gaps, interim corrective actions), as necessary to complete site assessment and cleanup of the site.
9. Maps showing PCE, TCE, *cis*-1,2-dichloroethene, and vinyl chloride concentrations for Shallow Zones 1 through 4 and an interpretation of the contaminant distribution in each of these zones.
10. A hydrograph of groundwater elevations in the UPZ monitoring wells.
11. The signature and stamp of a licensed geologist or engineer with applicable experience attesting, under penalty of perjury, that the report is true and accurate.
12. Narrative description of sample collection protocols and summary of analytical results for all detected compounds; and
13. Certified laboratory analytical reports and chain-of-custody records for current monitoring data.

If Mission conducts any monitoring or sampling more frequently than is required by this Monitoring and Reporting Program, Mission must include results of such monitoring in the monitoring reports.

In accordance with Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 through 3895 of the California Code of Regulations, Mission must submit monitoring reports and associated data in Portable Data Format (PDF) and Electronic Data Deliverable (EDD) format to the State Water Resources Control Board (State Water Board) GeoTracker database over the Internet. Please refer to the State Water Board web page Policy Statement-Electronic Reporting Requirements:¹

¹ State Water Board's Policy Statement Electronic Reporting Requirements:
http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal

LEGAL REQUIREMENTS

The Central Coast Water Board's requirement that you submit groundwater monitoring reports is made pursuant to section 13267 of the California Water Code. Pursuant to section 13268 of the Water Code, a violation of a Water Code section 13267 requirement may subject you to civil liability of up to \$1,000 per day for each day in which the violation occurs.

The Central Coast Water Board needs the required information to evaluate the extent of VOCs in groundwater beneath and downgradient of the subject site, and the performance of source area and groundwater remediation. Mission is required to submit this information because groundwater has been impacted by VOCs and, based on the available data, Mission is responsible for the discharge. Mission is named as a responsible party because it is the current property owner, it conducted operations that caused VOC discharges, and it owned the property during the time the VOCs were discharged. The evidence supporting this requirement is included in Mission's semi-annual groundwater monitoring reports and site characterization reports available on GeoTracker: <http://geotracker.waterboards.ca.gov/?gid=SL203061244>.

The cost to prepare the semi-annual monitoring reports is estimated to be in the range of \$7,000 to \$26,000. The benefit of completing the work is that it will provide the Central Coast Water Board with information to evaluate if further investigation, remediation, or site closure is appropriate, which will ensure protection of groundwater quality and human health.

Any person affected by this action of the Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The petition must be received by the State Board, Office of Chief Counsel, P. O. Box 100 Sacramento, CA 95812 within 30 days of the date of this order.²

The Executive Officer may rescind or revise this MRP at any time.

Ordered by,

for Ryan E. Lodge
Executive Officer

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² State Water Board's website for Water Quality:
https://www.waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.shtml

Table 1. Monitoring Frequency

Water bearing Zone	Well ID	Monitoring Frequency	1st Quarter (Jan. to Mar.)	3rd Quarter (July to Sept.)
SZ1	06-01	annual		x
	17-02	annual		x
	18-02	annual		x
	53-01	semiannual	x	x
	61-01	annual		x
	07-03	annual		x
	21-02	semiannual	x	x
	23-03	semiannual	x	x
	29-02	annual		x
	38-01	semiannual	x	x
	55-01 ^a	annual		x
	62-01 ^a	semiannual	x	x
SZ2	05-01	annual		x
	07-02	annual		x
	17-01	annual		x
	21-01	semiannual	x	x
	29-01	annual		x
SZ3	07-01	annual		x
	19-03	annual		x
	23-02	annual		x
	42-03	annual		x
	21-03	semiannual	x	x
	29-03	annual		x
SZ4	06-03	annual		x
	15-03	annual		x
UPZ	11-01	annual, gauge only		x
	22A2	annual, gauge only		x
	VCP-2	annual, gauge only		x

^a These wells are screened in both SZ1 and SZ2 water-bearing zones.

EXHIBIT 2

Central Coast Regional Water Quality Control Board

July 22, 2026

Tony Mancuso
Mission Linen Supply
702 East Montecito Street
Santa Barbara, CA 93103
Email: tmancuso@missionlinen.com

via Electronic Mail

Dear Tony Mancuso:

SITE CLEANUP PROGRAM: MISSION LINEN, FORMER AMBASSADOR LAUNDRY SITE, 201 E. HALEY STREET, SANTA BARBARA – TRANSMITTAL OF REVISED MONITORING AND REPORTING PROGRAM ORDER R3-2008-0027

Please find attached the revised Monitoring and Reporting Program (MRP) Order R3-2008-0027. The revised MRP applies to groundwater performance monitoring and reporting at the Mission Linen, Former Ambassador Laundry Site.¹ This MRP supersedes MRP R3-2008-0027 dated July 5, 2022. Based on our review of the information included in Mission's January 13, 2026 Low-Threat Closure Evaluation and Off-Site No Further Action Request (Closure Evaluation)² Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff revised monitoring requirements of wells included in Table 1 of the MRP.

In summary, many wells were recommended to be removed from the monitoring program and to be destroyed. The Central Coast Water Board concurs with the removal of some of the recommended wells; however, some of the wells still need to be sampled to track concentrations of volatile organic compounds (VOCs) in groundwater.

Wells that have been removed from the monitoring program include 54-01, 63-01, R-1, 12-01, 13-01, 36-02, 72-01, 16-01, 42-02, 73-01,³ 18-03, 56-01, 41-02, 16-03, 36-04, 52-03, and 47-01. The Central Coast Water Board concurs that these wells can be removed (and destroyed) because they demonstrate low-level, decreasing, or continued stable concentrations of VOCs.

Wells that remain in the monitoring program must continue to be monitored because they fit one or more of these criteria:

- Increasing or unstable concentrations of one or more VOCs.

¹ GeoTracker case file: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL203061244

² January 13, 2026 Low-Threat Closure Evaluation and Off-Site No Further Action Request: <https://geotracker.waterboards.ca.gov/?surl=ixf8q>

³ Well 73-01 is not listed in the well destruction request table but it may be destroyed if Mission wishes.

- Located in an area where additional assessment and/or remediation is needed (Garden Street or 23-03 areas).
- Annual gauging data are necessary to confirm hydraulic gradient separating contamination from the Upper Producing Zone (UPZ).

Mission may re-evaluate removing more wells in the future once concentrations in remaining wells have been confirmed to be lower, decreasing, or more stable. The revised MRP showing the reduced program is attached.

If you have any questions, please contact Daniel Pelikan at (805) 549-3880 daniel.pelikan@waterboards.ca.gov or Greg Bishop at (805) 549-3132 greg.bishop@waterboards.ca.gov.

Sincerely,

for Ryan E. Lodge
Executive Officer

Enclosure: Monitoring and Reporting Program Order R3-2008-0027, Revised July 22, 2026

cc via electronic mail:

Don Moore, Clean Financials, dmoore@cleanfinancials.com

Norm Colby, CGC Environmental, ncolby@cgcenvironmental.com

Rebecca Bjork, City of Santa Barbara, rbjork@santabarbaraca.gov

Hillary Hauser, Heal the Ocean, hillary@healtheocean.org

Jason Johnston, Santa Barbara County Public Health Department,
jason.johnston@sbcphd.org

Greg Bishop, Central Coast Water Board, greg.bishop@waterboards.ca.gov

Daniel Pelikan, Central Coast Water Board, daniel.pelikan@waterboards.ca.gov

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Haley - Mission\MRP\MRP 2026\2026 MRP Cover Letter.docx

Global ID: SL203061244

CR Site ID: 2030600

EXHIBIT 3

Central Coast Regional Water Quality Control Board

July 22, 2026

Mr. Tony Mancuso
Mission Linen Supply
702 East Montecito Street
Santa Barbara, CA 93103
Email: tmancuso@missionlinen.com

via Electronic Mail

SUBJECT: RESPONSE TO LOW-THREAT CLOSURE EVALUATION AND OFF-SITE NO FURTHER ACTION REQUEST WITH REQUIREMENTS FOR WELL DESTRUCTION WORK PLAN AND ON-SITE FEASIBILITY STUDY (SITE CLEANUP PROGRAM)

SITE: MISSION LINEN, FORMER AMBASSADOR LAUNDRY SITE, 201 E. HALEY STREET, SANTA BARBARA

Dear Tony Mancuso:

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) reviewed Mission Linen Supply's January 13, 2026 Low-Threat Closure Evaluation and Off-Site No Further Action Request (Closure Evaluation)¹ for the Ambassador Laundry site (Site).

The Closure Evaluation describes remediation progress of volatile organic compounds (VOCs) across the Site in soil, soil vapor, and groundwater. The Central Coast Water Board acknowledges the extensive cleanup work that has been completed by Mission Linen Supply over the previous decades at the Site. While significant progress has been made, there are still areas that may require additional actions before decisions of full case closure can be made.

Closure Evaluation Summary

The Closure Evaluation states that "remedial actions have eliminated or significantly reduced VOC concentrations in groundwater such that current and future unacceptable risks to human health, ecological health, and sensitive receptors have been mitigated." Additionally, the following low threat closure topics are described in more detail:

¹ Low-Threat Closure Evaluation and Off-Site No Further Action Request:

<https://geotracker.waterboards.ca.gov/?surl=ixf8q>

JANE GRAY, CHAIR | RYAN E. LODGE, EXECUTIVE OFFICER

- Pollutant Sources Are Identified and Evaluated
- The Site is Adequately Characterized
- Exposure Pathways, Receptors, Potential Risks, Threats, and Other Environmental Concerns are Identified and Assessed
- Pollutant Sources are Remediated to the Extent Feasible
- Unacceptable Risks to Human Health, Ecological Health, and Sensitive Receptors, Considering Current and Future Land and Water Uses, are Mitigated
- Unacceptable threats to Groundwater and Surface Water Resources, Considering Existing and Potential Beneficial Uses, are Mitigated
- Groundwater Plumes are Decreasing
- Cleanup Standards Can be Met within a Reasonable Timeframe
- Risk Management Measures are Appropriate, Documented and Do Not Require Future Water Board Oversight

The Closure Evaluation states that these criteria have been met, with the exception of the last point, and concedes that Soil Vapor Extraction System (SVE) operation/rebound testing still needs to be conducted and that groundwater monitoring also needs to be done in the area surrounding well 23-03. The Closure Evaluation does not commit to additional actions in the Garden Street area.

The Closure Evaluation includes the following recommendations (summarized here):

1. No Further Action (NFA) is recommended for all off-Site areas and the Central Coast Water Board issues a formal NFA decision for off-Site soil, soil vapor, and groundwater.
2. Prepare a work plan for destruction of all groundwater monitoring wells except for SZ1 well 23-03 and all off-Site soil vapor probes.
3. Continued groundwater monitoring at on-Site SZ1 well 23-03 to further evaluate the residual cis-1,2-DCE and vinyl chloride at this location.
4. Continue operating the SVE system targeting on-Site soil vapor probe SG-35 where elevated VOCs remain.
5. Prepare a draft Land Use Covenant (LUC) for the Mission property.

Central Coast Water Board Comments

Soil

Soil impacts were not described in detail in the Closure Evaluation. However, it is understood that soil impacts have been largely addressed with on-Site source area excavation work completed in 2011. Residual soil impacts should be described in future LUC(s) as appropriate to protect human health and the environment.

Soil Vapor

The Closure Evaluation states that “Off-Site vapor intrusion risk has been determined to be either within or below the risk management range and the Central Coast Water Board has approved suspension of the vapor intrusion monitoring program.” The Central Coast Water Board concurs with this assessment of vapor conditions and further review of on-Site vapor conditions will be made once the SVE system operation is complete (VOCs in soil vapor remain elevated near the former source and excavation area – e.g., near SG-35, SG-43, and SG-44R). Further directives regarding vapor conditions will be made under separate cover in the future and an official statement of completion of vapor monitoring may be made at that time.

Groundwater

The Central Coast Water Board concurs with much of the Closure Evaluation regarding groundwater conditions and progress except for residual VOCs in groundwater near the Garden Street and 23-03 areas.

Groundwater data from the 23-03 area (on-Site) show elevated concentrations of VOCs including *cis*-1,2 dichloroethene and vinyl chloride. The Closure Evaluation states that “targeted groundwater and soil vapor remedial actions and / or monitoring are still warranted in limited on-Site areas” and “the results of the LTC evaluation indicate that additional work is warranted in limited on-Site areas to meet the RWQCB LTC criteria.” The Central Coast Water Board agrees with this assessment. Because of this, an on-Site feasibility study must be conducted to address these residual VOC concentrations.

Groundwater data from the Garden Street area show elevated concentrations of VOCs, including tetrachloroethene (PCE). Previous communications from Mission Linen Supply have asserted a position that there are additional sources contributing to these concentrations of VOCs in groundwater and that the sewer has created a conduit to allow for the migration of VOCs. To the extent to which additional sources are found or confirmed, the VOC plume would be considered commingled; therefore, Mission is still considered responsible for the impacts in this area.

The Central Coast Water Board is in communication with the City of Santa Barbara to improve conditions of sewer lines in the Garden Street area and will evaluate if repairs will affect PCE concentrations in groundwater in the area. Continued monitoring to document VOC trends (including the potential decrease) is required per Monitoring and Reporting Program (MRP) No. R3-2008-0027. If concentrations attenuate, monitoring data could support the argument that active remediation might not be warranted in this area.

Review of Recommendations

Responses to the recommendations included in the Closure Evaluation are:

1. A No Further Action (NFA) determination for off-Site soil, soil vapor, and groundwater is premature. VOCs in groundwater in the Garden Street area need to be addressed.

2. Preparation of a work plan for abandonment of wells no longer part of the updated MRP is appropriate. The list of wells removed from the previous version of the MRP include 54-01, 63-01, R-1, 12-01, 13-01, 36-02, 72-01, 16-01, 42-02, 73-01, 18-03, 56-01, 41-02, 16-03, 36-04, 52-03, and 47-01. The updated MRP is being issued for the Site.

Abandonment of the full list of wells proposed in the Closure Evaluation² is not appropriate at this time. This is because there are numerous wells proposed for destruction that still demonstrate elevated, increasing, or unstable concentrations of VOCs. These trends are supported in the Monitoring and Remediation Optimization Software (MAROS) analysis included in Table 3.

Abandonment of proposed off-Site vadose zone monitoring infrastructure is appropriate if it is understood that these monitoring points are no longer needed for SVE operation and performance monitoring. SG-13 must not be destroyed so that it may be available for future sampling to monitor observed rebound. HSVE-06 must also not be destroyed until the SVE system is completely finished operating. The reason for this is to preserve the option of operation at this point should it be necessary.

3. The Central Coast Water Board agrees that continued monitoring is necessary in the on-Site 23-03 area.
4. The Central Coast Water Board agrees that continued operation of the SVE system is warranted.
5. Preparation of a draft LUC for any areas either on or off-Site is premature time. There are several areas that require additional monitoring or assessment. A LUC can be discussed in the future once remediation occurs and/or concentrations have been demonstrated to stabilize.

The Central Coast Water Board concurs with much of the Closure Evaluation except for topics identified in this letter. The well destruction work plan to abandon wells no longer listed in the updated MRP must be submitted to the Central Coast Water Board by **September 17, 2026**. The on-Site feasibility study to address residual VOCs in the area of 23-03 must be submitted to the Central Coast Water Board by **December 2, 2026**. Previous directives pertaining to submission of a SVE completion report and vapor conditions summary document remain in full effect.

Legal Requirements

Failure to comply with these requirements may subject Mission to enforcement action by the Central Coast Water Board, including issuance of an order under Water Code Sections 13267 and/or 13304, and potential administrative civil liabilities.

² Proposed groundwater and vapor monitoring point destruction lists:
<https://geotracker.waterboards.ca.gov/?surl=awdmk>

If you have any questions, please contact Daniel Pelikan at (805) 549-3880 daniel.pelikan@waterboards.ca.gov or Greg Bishop at (805) 549-3132 greg.bishop@waterboards.ca.gov.

Sincerely,

for Ryan E. Lodge
Executive Officer

cc via electronic mail:

Don Moore, Clean Financials, dmoore@cleanfinancials.com

Norm Colby, CGC Environmental, ncolby@cgccenvironmental.com

Erik Harz, Apex Companies, erik.harz@apexc.com

Rebecca Bjork, City of Santa Barbara, rbjork@SantaBarbaraca.gov

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Hillary Hauser, Heal the Ocean, hillary@healtheocean.org

Jason Johnston, Santa Barbara County Public Health Department,
jason.johnston@sbcphd.org

Greg Bishop, Central Coast Water Board, greg.bishop@waterboards.ca.gov

Daniel Pelikan, Central Coast Water Board, daniel.pelikan@waterboards.ca.gov

Global ID: SL203061244

CR Site ID: 2030600

EXHIBIT 4

**LOW-THREAT CLOSURE EVALUATION AND
OFF-SITE NO FURTHER ACTION REQUEST**

**Former Ambassador Laundry Site
201 East Haley Street
Santa Barbara, California 93101**

Prepared For:
Mission Linen Supply



Prepared By:



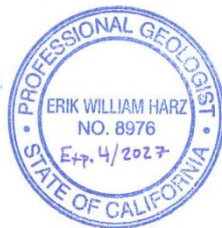
Apex Companies, LLC
10775 Pioneer Trail, Suite 210
Truckee, CA 96161

January 13, 2026

Prepared By:



Erik Harz, P.G.
Principal Geologist



Reviewed By:



Dan Grasmick, P.E.
Principal Chemical Engineer



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EXECUTIVE SUMMARY

This *Low-Threat Closure Evaluation and Off-Site No Further Action Request* (LTC Evaluation and Off-Site NFA Request) has been prepared by Apex Companies, LLC (Apex) on behalf of Mission Linen Supply (Mission). Geosyntec contributed to the vapor intrusion-related portions of this document and is in agreement with the conclusions and recommendations related to vapor intrusion. Environmental Risk Solutions, Inc. (ERS) is also a key contributor to this document.

The purpose of this LTC Evaluation and Off-Site NFA Request was to evaluate the current conditions in conjunction with the more than 35 years of remedial actions, mitigation measures and monitoring data associated with the former Ambassador Laundry facility, located at 201 East Haley Street, Santa Barbara, California (the Site) owned by Mission relative to the Regional Water Quality Control Board (RWQCB) *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites* (RWQCB – San Francisco Bay Region, July 31, 2009) (Low Threat Closure [LTC] Guidance). Based on this Low-Threat Closure (LTC) evaluation, no further action (NFA) is recommended for all off-Site areas as the groundwater and soil vapor conditions meet the RWQCB LTC criteria for volatile organic compounds (VOCs). The Site has already been progressing in this direction with the RWQCB approving destruction of twenty-two (22) groundwater monitoring wells and two vapor probes in 2022 and 2024 that were primarily in off-Site areas. Targeted groundwater and soil vapor remedial actions and / or monitoring are still warranted in limited on-Site areas.

The Site conditions were evaluated against the three general criteria from the LTC Guidance as follows:

1. Pollutant sources are identified and evaluated, Site is adequately characterized, and environmental risks are identified and assessed

Investigation activities beginning in the mid-1980s indicated that VOCs, primarily tetrachloroethene (PCE) were released into the subsurface through spills at the former Ambassador Laundry facility. PCE was released in the vicinity of a private water supply well at the facility (Ambassador Well). The Ambassador Well borehole annular space was reportedly sealed with gravel which created a conduit for PCE to migrate through five water-bearing zones not used for drinking water. Low levels of PCE also reached the Upper Producing Zone (UPZ) that has been used as a water resource.

Mitigation and remedial efforts were initiated soon after discovery of the release including destruction and sealing of the Ambassador Well in 1988. This eliminated the conduit for further PCE migration to the deeper water bearing zones. Characterization of the impacted water-bearing zones was completed over an approximate ten-year period between 1988 and 1998. More than 35 years of data from a robust network of groundwater monitoring wells and soil vapor probes has adequately characterized the lateral and vertical extent of subsurface VOCs. Additionally, the stability of the dissolved phase VOC plume in six water-bearing zones known as shallow water-bearing zones 1 through 5 (SZ1 through SZ5). The historic PCE impacts to the UPZ have declined to below the Maximum Contaminant

Level (MCL) and the migration pathway has been sealed so there is no further risk to public water supply.

Vapor intrusion (VI) risk related to Site impacts has been characterized using more than 15 years of monitoring data and six years of human health risk assessment (HHRA) which demonstrate that current off-Site VI risk levels are either within or below the risk management range. Off-Site VI monitoring was suspended in 2025 following RWQCB concurrence with Geosyntec's 2024 recommendation. Off-Site VI risk is expected to continue declining over time since the SZ1 groundwater impacts, which were the source of the off-Site VOC vapors, have been effectively remediated.

2. Pollutant sources have been remediated to the extent feasible and practicable

The pollutant source was PCE releases from the former dry-cleaning operations on the Mission property with the Ambassador Well serving as a secondary release mechanism that allowed VOC impacts to migrate to deeper water-bearing zones. The Ambassador Well secondary releases were mitigated by the destruction and sealing of the well which eliminated the conduit for the vertical migration of PCE. Source area soil impacts within the vadose zone and the entire SZ1 saturated interval were excavated and treated via ex-situ thermal desorption.

Multiple phases of remedial actions have been completed under RWQCB oversight over a 40-year period to treat the VOC impacts using the best available technologies at the time to reduce or eliminate VOCs in the immediate source area and within the extent of the dissolved phase plumes underlying commercial and residential properties and city streets. These technologies have included groundwater extraction and treatment, soil vapor extraction (SVE), ex-situ thermal desorption, and multiple phases of in-situ chemical oxidation (ISCO), in-situ chemical reduction (ISCR), and enhanced in-situ bioremediation (EISB). The RWQCB-approved 2010 Corrective Action Plan (CAP) included the ex-situ thermal desorption and EISB technologies followed by monitored natural attenuation (MNA) that have been successfully implemented and documented with ongoing MNA. Sub-slab depressurization (SSD) mitigation was initiated in 2021 at an adjacent property to address vapor intrusion concerns and a second phase of SVE was initiated in 2022 which has met cleanup objectives off-Site and is nearing completion on-Site.

Within the off-Site dissolved phase plume, a review of the historical data set indicates that remediation has been performed to the extent feasible and practicable with the best available technologies available at the time in consultation with and approval from RWQCB within the off-Site dissolved phase plume.

3. Groundwater plumes are decreasing, cleanup standards can be met within a reasonable time frame, and unacceptable risks have been mitigated

The termination point of the dissolved phase plume has been observed based on long term-term groundwater monitoring data to be in the vicinity of Garden and East Haley Streets.

The plume is stable and not expanding. The magnitude of impacts within the plume are decreasing as a result of the above-listed remedial actions and MNA. The majority of residual VOC impacts are limited to shallow water-bearing zones SZ1 and SZ2 and VOC concentrations are near or below MCLs with stable to decreasing trends that have been verified with the Air Force Center for Environmental Excellence's (AFCEE) Monitoring and Remediation Optimization Software (MAROS) statistical analysis. Aquitards between shallow water-bearing zones SZ3 through SZ5 inhibit vertical movement of VOCs between SZ1 through SZ4 and a 70-foot-thick aquitard between SZ5 and the UPZ further impedes any remaining VOCs from reaching the UPZ. Groundwater monitoring has shown that PCE has been below the MCL or non-detect at all UPZ monitoring wells installed in the vicinity of the Site for the past 20 years. In January 2025, the RWQCB approved suspension of the Site-wide vapor intrusion monitoring program. VOC-impacts in soil vapor and groundwater have been reduced to levels that no longer pose an unacceptable risk to human health or water resources.

The Site is located in downtown Santa Barbara in an area with numerous non-Mission PCE sources in up- or cross-gradient areas relative to the Site. Additionally, a heavily damaged sewer system beneath Garden Street operated by the City of Santa Barbara is present near the termination of the dissolved phase plume. The sewer system and up-sewer flow PCE dischargers have distributed non-Mission PCE along the sewer system and related utility corridor. Additionally, an upgradient, unknown PCE source in SZ3 has been contributing to PCE impacts beneath the Mission property for at least 30 years. The extensive remedial and mitigation efforts over more than 35 years have reduced Mission-related VOCs to levels below or similar to the residual non-Mission VOC impacts in the area.

Geosyntec recommended NFA related to off-Site VI monitoring and vadose zone remediation in October 2024 and the RWQCB approved the suspension of these activities in January 2025. Geosyntec recommended no further action related to off-Site VI mitigation in July 2025 and the RWQCB approved suspension of VI mitigation in August 2025. A formal NFA determination for off-Site VI investigation, VI mitigation and vadose zone remediation has not been issued.

The results of the LTC evaluation indicate that additional work is warranted in limited on-Site areas to meet the RWQCB LTC criteria; however, all Mission-related off-Site VOC impacts meet the LTC criteria and the off-Site groundwater monitoring well and vapor probe network can be destroyed along with on-Site monitoring wells that meet the LTC criteria. Below are Mission's recommendations:

1. NFA is recommended for all off-Site areas and the RWQCB issues a formal NFA decision for off-Site soil, soil vapor and groundwater.
2. Prepare a work plan for destruction of all groundwater monitoring wells except for SZ1 well 23-03 and all off-Site soil vapor probes. Geosyntec will prepare a work plan for decommissioning the SSD system and off-Site HSVE well. Transfer of SZ1 monitoring wells

to appropriate responsible parties located along the heavily damaged City sewer system and related utility corridor with non-Mission VOCs can be facilitated by the RWQCB, if needed.

3. Continued groundwater monitoring at on-Site SZ1 well 23-03 to further evaluate the residual cis-1,2-DCE and vinyl chloride at this location.
4. Continue operating the SVE system targeting on-Site soil vapor probe SG-35 where elevated VOCs remain. When asymptotic VOC concentrations are observed at SG-35, shut down the SVE system and conduct a rebound test at that location. If no significant rebound occurs, prepare and submit an SVE Implementation Completion Report pursuant to the RWQCB's January 31, 2025, *Revised Response to Summer 2024 Annual Vapor Intrusion Monitoring and Risk Management Report and Requirements for Submittals* (January 2025 Letter) (RWQCB, 2025).
5. Prepare a draft Land Use Covenant for the Mission property with supporting documents including a Site Management Plan for review by the RWQCB in anticipation of redevelopment of the property, similar to the 219 East Haley development that is nearing completion. The HSVE Implementation Completion Report and Vapor Conditions Report requested by the RWQCB in the January 2025 Letter will be prepared once on-Site HSVE is complete. Geosyntec will begin preparation of the off-Site portion of the Vapor Conditions Report, including a figure(s) showing the most recent COPC results in soil vapor at each off-Site location, to be finalized and submitted once on-Site HSVE is complete.

1.0 INTRODUCTION

Apex Companies, LLC (Apex) on behalf of Mission Linen Supply (Mission) has prepared this *Low-Threat Closure Evaluation and Off-Site No Further Action Request* (LTC Evaluation and Off-Site NFA Request) for the former Ambassador Laundry facility (the Site) located at 201 East Haley Street in Santa Barbara, California (Figures 1 through 3) with contributions from Geosyntec Consultants, Inc. (Geosyntec) and Environmental Risk Solutions, Inc. (ERS). Work conducted at the Site and downgradient areas has been performed under the oversight of the Central Coast Regional Water Quality Control Board (RWQCB) for more than 35 years.

This LTC Evaluation and Off-Site NFA Request provides information and rationale in support of Mission's request for the RWQCB to issue a formal off-Site no further action (NFA) determination based on the extensive remediation and monitoring activities that have led to the current soil vapor and groundwater conditions beneath the Site and downgradient areas. This LTC Evaluation and Off-Site NFA Request is based on a comparison of current volatile organic compound (VOC) conditions relative to:

1. The remedial actions performed pursuant to the RWQCB-approved Corrective Action Plan (2010 CAP) dated January 29, 2010 and numerous prior interim remedial actions and mitigation measures conducted by Mission since 1988; and
2. Closure criteria presented in the RWQCB's low-threat closure (LTC) guidance, *Draft Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites*, dated July 31, 2009 (LTC Guidance).

This LTC Evaluation and Off-Site NFA Request demonstrates that Mission-related VOC impacts in off-Site areas meet RWQCB VOC LTC guidance criteria and no longer pose an unacceptable risk to human health or water resources. Mission will continue targeted monitoring and remedial actions related to residual elevated VOC impacts in soil vapor and groundwater in two on-Site areas. Monitored natural attenuation (MNA) is the final remedy component pursuant to the RWQCB-approved 2010 CAP that is appropriate in conjunction with a land use covenant (LUC) documenting any residual elevated on-Site VOC impacts and tailored for property redevelopment.

2.0 BACKGROUND

The former Ambassador Laundry Site was operated as a commercial laundry and dry-cleaning facility beginning in the 1920s. Mission acquired the Site in 1970 and continued laundry and dry-cleaning operations until 1986. The historic operations resulted in unintentional releases of tetrachloroethene (PCE) to soil and groundwater from spills and releases that occurred over decades. PCE that was released in the vicinity of a private water supply well at the facility (Ambassador Well) migrated through five water bearing zones not used for drinking water. Low levels of PCE also reached the Upper Producing Zone (UPZ) that has been used as a water resource. This occurred as a result of the Ambassador Well reportedly being sealed with gravel which created a conduit for PCE to migrate vertically. Land use in the vicinity of the Site is both residential and commercial.

In 1985, groundwater samples collected from wells completed in the UPZ, which is used for water supply by the City of Santa Barbara (City) were analyzed and found to contain PCE. The sampled wells included several supply wells owned by the City and a supply well owned and operated by Mission at the site. Some of the samples contained concentrations of PCE above the Federal and State of California (State) standards. The current maximum contaminant level (MCL) for PCE published by the United States Environmental Protection Agency (USEPA) and the RWQCB is 5 micrograms per liter (µg/L) for drinking water.

Groundwater extraction and soil vapor extraction (SVE) and treatment systems were constructed inside the former Ambassador building in 1990. During 1996 and 1997, the former laundry and dry-cleaning building at the Site was demolished. Prior to this demolition, these treatment systems were moved to a new treatment compound that was constructed on the Site in 1996. After operating for a period of almost 12 years, the groundwater extraction and treatment system at the Site was shut down in late 2003. These systems were replaced in 2003 by the ongoing in situ remediation program along with the 2011 source area corrective action.

The initial in situ remediation program was conducted between September 2003 and December 2004 and included injection of modified Fenton's reagent and potassium permanganate in three separate injection events. An Emulsified Oil Substrate (EOS) injection pilot test was conducted in April 2007. The most recent remedial actions were conducted in accordance with the source area Remedial Design and Implementation Plan (RDIP; URS, 2010d) and 2010 CAP. These documents selected an appropriate remedy to address soil and groundwater contamination at and in the vicinity of the Site. Remediation subsequent to these RWQCB approved documents included source area excavation, treatment and backfill conducted during late 2011 using the evaporative desorption technology (EDT) and application of a bioremediation amendment with the backfill, followed by enhanced in-situ bioremediation (EISB) injection events in accordance with the groundwater RDIP (The Source Group, Inc., 2011) that were performed in April 2012, November 2014, and August 2017. An additional EISB injection event was completed in July 2023 in accordance with the *Phase*

IV Enhanced In-Situ Bioremediation Implementation Work Plan (Apex, 2023). SVE was implemented again at the Site in June 2022 as described further in Section 2.4 (Geosyntec, 2022).

2.1 Hydrogeology

The geologic and hydrogeologic settings are complex in the vicinity of the Site. The vadose zone typically extends from surface to approximately 10 feet below ground surface (bgs). Below this, from 10 feet to approximately 140 feet bgs, make up the hydrologic unit typically referred to as the Shallow Zone, which overlies the UPZ. The Shallow Zone generally consists of relatively low-permeability sand, silt and clay that yield little water to wells. Municipal pumping wells do not draw water from this interval. Water-bearing intervals within the Shallow Zone are typically laterally discontinuous, resulting from the estuarine depositional environment (URS, 2010a).

In the Shallow Zone immediately beneath the Site, five water-bearing intervals exhibiting highly variable hydraulic properties, thickness, and lateral continuity have been identified to-date. These intervals, from shallowest to deepest, are generally referred to as Shallow Zones (SZ) 1, 2, 3, 4, and 5, respectively. SZ1 through SZ5 and the UPZ are illustrated in cross-section on Figure 4.

SZ1 contains groundwater under unconfined (water table) conditions throughout the Site, and in most areas the water-table surface in Shallow Zone 1 is approximately 10 feet bgs. Shallow Zone 2 is considered to be a semi-confined unit, and the top of this interval is encountered at approximately 20 feet bgs. Beneath a large portion of the Site, Shallow Zone 1 and Shallow Zone 2 are separated by a 5- to 10-foot-thick layer of clay or silty clay. Where present, this unit predominantly acts as a confining layer but is semi-confining or leaking in some locations. The confining layer is generally characterized by a mottled olive-green/gray/blue clay to silty clay that is often described as dry, moist, or tight, and containing dark organic material and small fragments of red siltstone. Approximately 200 feet east of the Site, the confining layer is interpreted to pinch out, and Shallow Zone 1 and Shallow Zone 2 merge to form a single unconfined unit. Shallow Zone 1 and Shallow Zone 2 typically contain silty sand interbedded with silt and clayey sand and silt. Some gravel is found in the sequence but is of limited thickness and extent.

Shallow Zone 3 is typically separated from Shallow Zone 2 by a clay aquitard of variable thickness. The depth of the base of Shallow Zone 3 is believed to range from approximately 40 to 65 feet bgs, where another confining clay layer has been encountered.

Shallow Zone 3 and Shallow Zone 4 appear to be separated by a clay, silt, and silty sand aquitard approximately 20 feet thick. The top of Shallow Zone 4 was encountered at approximately 70 to 75 feet bgs at several locations across the Site.

Shallow Zone 5 is defined by a single well (52-03) installed near the historical source area that is screened in a thin water-bearing zone beneath Shallow Zone 4 at approximately 120 feet bgs. The purpose of this well is to evaluate the vertical limit to the Shallow Zone contamination from the Site.

The Mission well, historically used to supply water for laundry operations at the Site, was properly abandoned at the direction of the RWQCB in 1988. Prior to destruction and sealing, this well may have acted as a conduit for the observed impacts encountered in the deeper Shallow Zone intervals and the UPZ. In the vicinity of the Site, the top of the confined UPZ is present at approximately 220 feet bgs, which is approximately 70-feet below the base of Shallow Zone 5, and is isolated by an approximately 70-foot-thick competent aquitard. The thickness of the UPZ beneath the Site is thought to average approximately 65 feet. The UPZ is one of a series of deep water-bearing units of relatively high transmissivity that in the past have been used for water supply by the City through a series of production wells within the City limits. However, the City had not used its well field in the vicinity of the Site for municipal production on a regular basis since October 1990 (URS, 2010a) until regular pumping resumed in 2014.

In general, the regional groundwater flow direction is toward the northeast. A strong upward-oriented hydraulic gradient is typically observed between the UPZ and the Shallow Zone as well as between the individual units within the Shallow Zone when the City's wells in the vicinity of the Site are not in routine operation. This upward gradient limits the movement of contaminants in the Shallow Zone to the deeper UPZ.

2.2 Constituents of Interest

Groundwater contamination remaining beneath the Site consists of VOCs, or more specifically, chlorinated ethenes. The most prevalent VOC is PCE. Other VOCs of interest include trichloroethene (TCE), cis-1,2-dichloroethene (cis-1,2-DCE), and vinyl chloride.

2.3 Groundwater Monitoring Well Network and Monitoring Requirements

The Site groundwater monitoring well network monitors SZ1 through SZ5 and the UPZ and has fluctuated in the past and has included up to approximately 81 well locations. The well network has been reduced through time as a result of remedial progress, redevelopment, and/or remedial system decommissioning. 22 wells have been destroyed between 2002 and 2024 with approval from the RWQCB. The current groundwater monitoring network consists of 44 wells. Groundwater well locations are shown on Figure 2.

Monitoring is conducted pursuant to Monitoring and Reporting Program (M&RP) R3-2008-0027 dated March 21, 2008, issued by the RWQCB. The M&RP was revised by the RWQCB on September 21, 2015, February 28, 2018, February 17, 2022 and again on February 21, 2024 based on the reductions and overall stability of VOCs in groundwater. Per the revised M&RP, groundwater sampling is conducted on a semi-annual basis in the first and third quarters of each calendar year. UPZ wells were gauged on a monthly basis through the end of 2018; a reduction in gauging frequency of UPZ wells to semi-annual was approved by the RWQCB beginning in January 2019.

2.4 Vapor Intrusion Monitoring and Mitigation and Vadose Zone Remediation

This section summarizes vapor intrusion (VI) monitoring, VI mitigation and vadose zone remediation activities performed at the Site and off-Site areas. In response to recommendations made by Geosyntec in the reports referenced below, the RWQCB has approved suspension of all off-Site activities related to VI monitoring, VI mitigation and vadose zone remediation; however, a formal NFA approval has not yet been issued.

VI Monitoring Status

VI monitoring was implemented on-Site and at off-Site properties overlying the SZ1 groundwater plume beginning in 2009 that continued through summer 2024. A total of 53 soil vapor probes and 24 indoor air or subfloor air locations were sampled over this 15-year period to assess VI risk (Figure 3). Details of the VI monitoring program are discussed in Geosyntec's *Summer 2024 Annual Vapor Intrusion Monitoring and Risk Management Report* (2024 VI Monitoring Report) (Geosyntec, 2024). The results of each VI monitoring event were used to update Site-specific attenuation factors and screening levels and conduct a quantitative VI human health risk assessment (HHRA). Based on criteria defined in the *Vapor Intrusion Risk Management Implementation Plan* (VIRMIP) (Geosyntec, 2019), VI monitoring locations were removed from the VI monitoring program if concentrations were below San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs) (SFBRWQCB, 2019) or Site-specific screening levels for two consecutive monitoring events.

Following the 2024 VI monitoring event, Geosyntec recommended that the VI monitoring program be discontinued because estimated cumulative cancer risks for the remaining ten (10) VI monitoring locations (nine soil vapor locations and one subfloor air location) were below or within the target cancer risk (CR) management range (i.e., 1×10^{-6} to 1×10^{-4}) and cumulative hazard index (HI) estimates for the remaining locations were below the target HI of 1 (Geosyntec, 2024).¹ In their response letter, the RWQCB approved the suspension of the VI monitoring and reporting program pending the following conditions (RWQCB, 2025):

- Submission of a sub-slab depressurization (SSD) implementation completion report for 528 Santa Barbara Street following shut-down and rebound testing of the system.
- Submission of a horizontal soil vapor extraction (HSVE) implementation completion report following rebound testing of the HSVE system.
- Submission of a standalone Vapor Conditions Report describing current vapor conditions of the VI monitoring area to serve as a reference point for future users and the public to understand post-remediation vapor conditions.

¹ Cumulative CR and HI risks were estimated using ESLs for the indoor air and subfloor air locations and site-specific screening levels for soil gas locations. Either residential or commercial screening levels were used for estimating risk based on the

HSV) Remediation Status

HSVE was initiated on June 20, 2022, targeting the former source area where residual elevated soil vapor VOC concentrations remained. Details of HSVE implementation and operation are included in the *Horizontal Soil Vapor Extraction System Implementation and Construction Report* (Geosyntec, 2022), and the *Horizontal Soil Vapor Extraction System Annual Monitoring Report for 2024* (Geosyntec, 2025a).

Following six months of HSVE rebound testing conducted between January 31 and July 25, 2024, significant rebound was limited to on-Site soil vapor monitoring probes SG-35 and SG-43. Rebound was not observed in off-Site soil vapor monitoring probe SG-13 located near the off-Site 528 Santa Barbara Street unit. The HSVE system was restarted on August 20, 2024, targeting on-Site areas near SG-35 and SG-43. In accordance with Geosyntec's recommendations in the 2024 VI Monitoring Report and the RWQCB response letter (RWQCB, 2025), no further HSVE operation off-Site is warranted. HSVE remediation is continuing on-Site and is targeting vapors in the vicinity of soil vapor probe SG-35 where elevated levels of PCE were detected. VOCs continue to be observed following the most recent 6-month rebound test.

SSD Mitigation at 528 Santa Barbara Street Status

SSD was implemented to mitigate vapor intrusion risk at the off-Site 528 Santa Barbara Street unit on July 21, 2021. Details of SSD implementation are included in Geosyntec's *Sub-Slab Depressurization System Installation Report* (Geosyntec, 2021). The off-Site HSVE operations resulted in a two-fold order-of-magnitude decrease in soil vapor VOC concentrations in the vicinity of 528 Santa Barbara Street. Consequently, Geosyntec evaluated the SSD system for permanent shutdown beginning in August 2024. Results of the SSD shutdown evaluation and rebound testing were presented in the *Sub-Slab Depressurization Implementation Completion Report for 528 Santa Barbara Street* (Geosyntec, 2025b) and in a follow-up email to the RWQCB dated July 25, 2025, which presented the final rebound testing results. Based on the results of the SSD rebound testing, Geosyntec recommended permanent shutdown of the SSD system. The RWQCB agreed that the SSD system could remain off in an email dated August 1, 2025; however, a final RWQCB decision regarding permanent shutdown of the SSD system is pending.

3.0 NON-MISSION PCE SOURCES IN THE SITE VICINITY

3.1 PCE Impacts in the Vicinity of the Site

In 2013, ERS prepared a summary of off-Site properties with known PCE and VOC contamination located in an up- or cross-gradient groundwater flow direction relative to the Site. This summary is titled *Off-Site Tetrachloroethene (PCE) Impacts in the Vicinity of the Former Ambassador Laundry Facility, 201 East Haley Street, Santa Barbara, CA* dated May 3, 2013. The summary included information obtained from the RWQCB Geotracker database and hard copy files reviewed at the Central Coast RWQCB office in April 2012. The purpose of the summary was to evaluate: (1) PCE impacts at nearby properties relative to the Section 5.5 Background Evaluation included in the URS Corrective Action Plan dated August 2010; and, (2) criteria used by the RWQCB and other agencies for issuing closure for other PCE impacted properties in the Site vicinity. Six confirmed PCE-impacted properties within 600 feet of the Site were identified and described in the ERS 2013 summary. A review of the Geotracker database in 2024 yielded five additional properties with known PCE impact that are likely current or past dischargers of PCE into the City sewer system. Based on review of the data and available reports, the PCE impacts at these properties appear to be related to both on-Site sources and PCE impacts from other unknown sources in the Site vicinity.

There is also clear evidence of an upgradient, off-Site unknown source that has been contributing PCE to SZ3 groundwater beneath the Site since the early 1990s ranging from 16 to 24 µg/L based on data at SZ-3 well 41-02 located at Vera Cruz Park.

A summary of nearby PCE impacted properties relative to the Site and the Garden Street sewer system is included as Figure 5. A copy of the 2013 ERS Summary is included as Appendix A.

3.2 VOC Impacts Beneath Garden Street

This section has been prepared and progressively developed from 2021 to 2025 in response to a RWQCB request for a technical response related to the elevated VOC impacts along Garden Street aligned with the City's heavily damaged sewer line and related utility corridor. The Mission team compiled multiple lines of evidence from numerous sources and is now largely captured in the December 23, 2024 technical submittal prepared by ERS that is included as Appendix B. The ERS submittal summarizes the collaborative effort between ERS, CGC Environmental and Apex that includes information from the City and various other sources. Through multiple lines of evidence developed over this four year period, it has become clear that the responsible parties for current VOC impacts within and along the utility corridor beneath Garden Street are (1) the City based on their heavily damaged sewer lines and (2) numerous known and potential up-flow PCE dischargers into the City sewers.

3.3 Garden Street VOC and Sewer Line Evaluation, RWQCB 2021 - 2025 Meetings and Technical Submittals

The following summarizes meetings and correspondence between RWQCB, Mission, ERS, and Apex between 2021 to 2025.

Topics discussed during these meetings and related correspondence include: 1) Mission's evaluation of PCE impacts along Garden Street which included a review of City sewer records; 2) non-Mission PCE impacts in the vicinity of the Site including cases closed by the RWQCB; and, 3) transition from active remediation to MNA, the final remedial component of the RWQCB approved 2010 CAP.

- **December 15, 2022 Meeting** – between RWQCB, ERS, and Apex where the evaluation of PCE impacts along Garden Street included in the 2021 and 2022 Semi-Annual Monitoring Reports were discussed in response to the 2021 RWQCB comment for a technical evaluation of this area. Topics included: the evolution of the PCE plume between 2000-2022, the condition of the City sewer system and City-wide sewer issues; the City's emergency 2018 sewer repair at the intersection of Garden and Haley Street and VOC trends in nearby well 62-01; non-Mission PCE sources and VOC impacts in the area; and, Mission's interest in moving towards MNA pursuant to the RWQCB approved 2010 CAP.
- **February 23, 2023 RWQCB Follow Up** – the RWQCB responded to the sewer evaluation in a February 23, 2023 letter. In the letter, the RWQCB indicated at the time of letter preparation, there was not sufficient evidence to name additional responsible parties; and, continued monitoring along Garden Street was needed to evaluate concentration trends.
- **December 19, 2024 Meeting** – between the RWQCB, Mission, ERS, and Apex where a more detailed evaluation of PCE impacts along Garden Street included in the 2024 Semi-Annual Groundwater Report was discussed. Further research identified multiple up sewer flow PCE sources along Garden Street, and VOC spikes within the groundwater well network that correspond to the 2023-2024 winter storm season and pulsing sewer flow conditions. Mission highlighted that the City is no longer responding to Mission's requests for further information about the integrity of the sewer system and that the RWQCB has not disagreed with any of Mission's positions and multiple lines of evidence presented since 2021. Mission explained that their position is that any remedy along Garden Street begins with the City repairing their sewers and accepting responsibility for cleanup and addressing the up-flow dischargers.

Mission explained that their position is that the utility corridor and related impacts should be designated as a separate Site Cleanup Program case with the City as the primary responsible party. Mission documented this meeting in the December 24, 2024, ERS technical submittal.

- **November 6, 2025 Discussion** – between RWQCB and ERS where the City sewer issues and related VOC impacts detailed in the ERS technical submittal were discussed. ERS summarized the meeting in an email dated November 7, 2025.

- **November 12, 2025 RWQCB Follow Up** – the RWQCB responded in an email dated November 12, 2025, indicating that they are planning to contact the City to discuss the sewer issues along Garden Street. The RWQCB acknowledged the non-Mission impacts but indicated they considered this area to be comingled and highlighted that Mission’s Monitoring and Reporting Program 2008-0027 was still in effect.
- **December 4, 2025 ERS Follow Up** – ERS responded in an email dated December 4, 2025 that concluded, “We recognize that the Water Board position regarding commingled impacts ‘keeps Mission on the hook’ but this is not a Mission problem – pursuant to our stated position, there is nothing more for Mission to do in this area. This analysis will be further detailed in Mission’s Low-Threat Closure Evaluation and Request to be submitted later this month. We appreciate your attention to this subject and look forward to hearing about your discussions with the City.”

Potential Mission-related PCE impacts at well 62-01 prior to the sewer-related spikes in VOC concentrations that started in 2015 ranged from about 10 to 30 µg/L. Based on the overwhelming non-Mission VOCs impacts that have impacted that location over the past 10 years in conjunction with the preferential pathway utility corridor, it is unclear if any Mission-related impacts remain in that area. There is no evidence that suggests any of the PCE impacts at wells 53-01 and 38-01 were ever related to Mission as they are well out of the SZ1 flow path from the former Mission source area that is well established. Further, these wells are located north and adjacent to the heavily damaged sewer lines and preferential pathway utility corridor that is at least 12 feet in depth that intercepts the upper half of SZ1. In the absence of the sewer-related discharges, if any Mission-related PCE still remained in the 10 to 30 µg/L range at well 62-01, those levels would meet the RWQCB LTC criteria.

4.0 LOW THREAT CLOSURE EVALUATION

This low threat closure evaluation has been completed using the framework provided in the San Francisco Bay - RWQCB's 2009 LTC Guidance and largely focuses on groundwater. As reflected in the background section above, the RWQCB approved suspension of off-Site VI-related activities based on Geosyntec's conclusion that remaining off-Site vapor intrusion risk is either within or below the risk management range. The LTC Guidance was designed by the RWQCB to close sites that pose minimal threat to human and ecological health, water quality, and beneficial uses, but do not yet meet cleanup standards at all locations. LTC is based on the understanding that cleanup standards can be met under natural conditions within a reasonable timeframe once adequate source control and plume remediation are complete. The LTC Guidance includes nine narrative criteria which need to be addressed prior to Site closure.

As discussed in Section 2.0 above, VOC impacts to groundwater underlying the Site are a result of former dry-cleaning operations at the Site. Site investigations began in 1985 when groundwater samples collected from UPZ water supply wells were found to contain PCE. Remedial actions to mitigate Site-related VOC impacts were initiated in 1988 and have been conducted through 2025. The VOC impacted groundwater was the primary source of VOC impacts to soil vapor, so the groundwater remedial actions have also reduced the soil vapor levels. Remedial actions have eliminated or significantly reduced VOC concentrations in groundwater such that current and future unacceptable risks to human health, ecological health, and sensitive receptors have been mitigated. Residual concentrations of VOCs in these media are evaluated below based on the nine narrative LTC criteria and site-specific conditions and limitations.

Detailed reports summarizing nearly 40 years of assessment, remedial and mitigation actions, monitoring and related technical evaluation are available at the Geotracker website via the link below:

https://geotracker.waterboards.ca.gov/profile_report?global_id=SL203061244

4.1 Develop a Complete Conceptual Site Model (CSM)

4.1.1 Pollutant Sources Are Identified and Evaluated

YES – The pollutant source was PCE releases from spills associated with the former dry-cleaning operations on the Mission property. PCE was also released in the vicinity of the Ambassador Well. The Ambassador Well borehole annular space was reportedly sealed with gravel which created a secondary release mechanism that allowed VOC impacts to migrate to the deeper shallow water bearing zones SZ1 through SZ5 and the UPZ which is used for public water supply. These two release mechanisms resulted in a dissolved phase PCE groundwater plume extending downgradient of the Site approximately 400 feet north-northeast where it terminates in the vicinity of the intersection of Garden and East Haley Street. Partitioning of vapors off the groundwater plume resulted in a soil vapor plume with a similar spatial distribution and chemical signature to SZ1. The Site is shown on Figures 1, 2, and 3.

4.1.2 The Site is Adequately Characterized

YES - Previous investigations have identified and characterized the horizontal extent of VOC impacts to the vadose zone, SZ1 through SZ5 and the UPZ. The hydrogeology and five water bearing zones (SZ1 through SZ5) as well as the UPZ are described in Section 2.1. Figure 4 illustrates SZ1 through SZ5 and the UPZ in cross-section.

There has been a robust monitoring network with more than 100 sampling locations for indoor air, sub-floors, soil vapor and groundwater over the past nearly 40 years since groundwater monitoring was first conducted. This network has provided sufficient horizontal and vertical delineation of air, soil vapor and groundwater.

4.1.3 Exposure Pathways, Receptors, Potential Risks, Threats, and Other Environmental Concerns are Identified and Assessed

YES – A CSM was developed for the Site to identify VOC sources and exposure pathways to potential human receptors and the environment. The CSM has been updated and refined during Site assessment which was initiated in 1985. The most recent CSM was presented in the 2010 CAP. The CSM has been updated and included as Tables 1 and 2. Table 1 shows three potential exposure pathways as they existed prior to remediation and mitigation. These potential exposure pathways have been closed or minimized due to pollutant remediation and vapor intrusion mitigation controls as shown on Table 2. Potentially complete exposure pathways include the following:

- Soil vapor migration from the subsurface to indoor air and vapor inhalation by future commercial workers on-Site; and
- Potential ingestion and dermal contact of groundwater and soil by construction workers completing excavation for subsurface construction work.

4.2 Control Sources and Mitigate Risks and Threats

4.2.1 Pollutant Sources are Remediated to the Extent Feasible

YES - Multiple phases of remedial actions have been completed under RWQCB oversight over a 40-year period to treat the VOC impacts using the best available technologies at the time to reduce or eliminate VOCs in the immediate source area and within the extent of the dissolved phase plumes underlying commercial and residential properties and city streets. These technologies have included destruction and sealing of the poorly constructed Ambassador Well, groundwater extraction and treatment, SVE, ex-situ thermal desorption, and multiple phases of in-situ chemical oxidation (ISCO), in-situ chemical reduction (ISCR), and EISB. The RWQCB-approved 2010 CAP included the ex-situ thermal desorption and EISB technologies followed by MNA that have all be successfully implemented and documented. A review of the historical data set and current Site conditions indicates that remediation has been performed to the extent feasible and practicable with the best available technologies at the time in consultation and approval from RWQCB within the off-Site dissolved phase plume.

SSD mitigation was implemented at 528 Santa Barbara Street in 2021 to address vapor intrusion concerns. SSD rebound testing performed in 2025 demonstrated that further SSD mitigation is not necessary and permanent shutdown of the SSD system was recommended by Geosyntec in a July 25, 2025, email to RWQCB. The RWQCB agreed that the SSD system could remain off in an August 1, 2025 email response, but a final decision on permanent shutdown is pending.

A second phase of SVE remediation targeting residual vadose zone impacts on-Site and directly north of the Site at 528 Santa Barbara Street was initiated in 2022. Remediation of the off-Site areas was completed in 2024, as discussed in Section 2.4, and targeted remediation of the on-Site area is continuing.

4.2.1.1 Summary of Groundwater Remediation Actions

To effectively summarize the extensive chronology of remedial actions performed at the Site, remedial actions are summarized in chronological order in a “flip book” format, on Figures 6 through 17.

A historical summary of remedial actions typically included in semi-annual groundwater reports prepared by CGC Environmental is also included as Appendix C.

4.2.1.2 Analysis of Pollutant Sources Remediated to the Extent Practicable

4.2.1.2.1. SZ1 through SZ3

To determine whether the pollutant sources have been remediated to the extent practicable in groundwater, the following evaluations were completed:

1. The maximum VOC concentration at each groundwater well was compared to the current VOC concentrations at each well. Figures 18 through 20 provide these comparisons and illustrate the dramatic reduction in all VOCs, most notably PCE. These figures also indicate that daughter products such as TCE, cis-1,2-DCE, and vinyl chloride are not always being generated as a result of PCE degradation. This suggests that abiotic and biotic degradation of PCE play a role in complete transformation of PCE to nontoxic byproducts.
2. The total estimated average VOC mass (summation of PCE, TCE, cis-1,2-DCE, and vinyl chloride) in the SZ1 through SZ3 was calculated at select snapshots in time using the zeroth moment of the spatial moment analysis module included in the software program Monitoring and Remediation Optimization System (MAROS) (AFCEE, 2006). Total estimated VOC mass is a function of the available wells within the groundwater monitoring well network available at a given point in time. It should be noted that the number of groundwater monitoring wells at the Site has changed as VOC impacts to groundwater have been assessed and characterization has been completed. The VOC mass summation for SZ1 through SZ3 is illustrated on Figure 21. Average total estimated dissolved phase CVOC mass was calculated three times for SZ1 through SZ3:

- a. 1991 - Post destruction and sealing of the former Ambassador Laundry supply well, pre-active remediation / maximum VOC mass / approximate time when the construction of the SZ1 through SZ3 groundwater monitoring network was generally completed);
- b. 2012 - Pre-implementation of four phases of EISB treatment pursuant to the 2010 CAP; and,
- c. 2025 - Current total VOC mass post-four phases of EISB treatment pursuant to the 2010 CAP.

Based on these calculations, the following observations are highlighted:

- The maximum total dissolved phase VOC mass combined in SZ1 through SZ3 was 10.7 kilograms (kg) in 1990.
 - In 2012 it was reduced to 1.26 kg.
 - In 2025 it was reduced to approximately 0.87 kg, an estimated order of magnitude reduction in total dissolved phase VOC mass since 1990.
3. To illustrate remediation to the extent practicable, Figures 18 through 20 compare maximum PCE concentrations to current concentrations. Wells located northeast of Garden Street were excluded from the evaluation based on the rationale provided in Section 3.3. These include wells 38-01, 53-01, 54-01, 55-01, 62-01, and R-1. The most significant reductions by zone are shown in the table below:

Water Bearing Zone	Maximum PCE Concentration	Current PCE Concentration	Location
SZ1	9,200 µg/L	Non-Detect <500 µg/L	23-03 (source area)
SZ2	42,000 µg/L	Non-Detect <0.5 µg/L	13-01 (source area)
SZ3	2,400 µg/L	Non-Detect <0.5 µg/L	18-03 (down gradient)

4. The table below summarizes the current PCE concentrations compared to the MCL of 5 µg/L within SZ1, SZ2, and SZ3:

Water Bearing Zone	Number of wells below MCL/Non-Detect	Total number of wells monitored	Location and Max Concentration
SZ1	7	9	17 µg/L - down gradient well 61-01

Water Bearing Zone	Number of wells below MCL/Non-Detect	Total number of wells monitored	Location and Max Concentration
SZ2	7	12	17 µg/L - source area well 16-01
SZ3	2	10	99 µg/L - down gradient well 21-03

4.2.1.2.2. SZ4, SZ5 and UPZ

The sole remedial action performed in lower shallow water-bearing zones SZ4, SZ5, and the deeper water-bearing UPZ was the destruction and sealing of the former Ambassador Well, which eliminated the primary source and conduit for PCE to migrate to these water bearing zones. In order to determine whether the pollutant sources have been remediated to the extent practicable in groundwater, the maximum PCE concentration at each groundwater well was compared to the current PCE concentrations at each well. This comparison is shown on Figures 22 through 24. The comparison shows that daughter products such as TCE, cis-1,2-DCE, trans-1,2-DCE, and vinyl chloride are not being generated as a result of PCE degradation. This suggests that abiotic degradation of PCE plays a role in complete transformation of PCE to nontoxic products. Natural processes such as dilution and dispersion likely also play a role in the reduction of PCE.

Three wells monitor SZ4 groundwater and the current maximum PCE concentration in SZ4 wells is 32 µg/L at cross gradient well 36-04. One well monitors SZ5 groundwater (52-03) and PCE is below the MCL at a concentration of 3.9 µg/L. Four wells monitor the UPZ groundwater and all of them are below the MCL. The highest UPZ PCE concentration is 2.8 µg/L at 47-01. Wells in the UPZ are no longer sampled per the revised M&RP. The last PCE detection above the MCL in the UPZ was 20 years ago in 2005 from well 47-01 at 5.6 µg/L.

4.2.1.2.3. Remediation to the Extent Feasible and Practicable Summary

The magnitude of impacts within the plume are decreasing as a result of remedial actions and MNA. The majority of residual VOC impacts are limited to SZ1 and SZ2 and are near or below the MCL with stable or decreasing trends. Aquitards between SZ3 through SZ5 inhibit vertical movement of VOCs between the shallow zone and the UPZ and a 70-foot-thick aquitard between SZ5 and the UPZ further impedes any remaining VOCs from reaching the UPZ. Further, an upward hydraulic gradient has persisted for most of the past 30 years. Groundwater monitoring has shown that PCE has been below MCL or non-detect at all UPZ monitoring wells for the past 20 years.

4.2.2 Unacceptable Risks to Human Health, Ecological Health, and Sensitive Receptors, Considering Current and Future Land and Water Uses, are Mitigated

YES – Ecological health and sensitive receptors are not applicable to this Site as the VOC impacted groundwater underlies commercial and residential areas. VOC impacted groundwater could pose a

risk to human health through dermal contact, ingestion, and volatilization. Given the depth to groundwater which at approximately eight to ten feet bgs is generally below typical soil disturbance depths for construction, the low residual remaining VOC concentrations that are generally limited to the source area, and low likelihood of prolonged exposure, dermal contact and ingestion pathways are not considered significant routes of exposure.

Inhalation risks have largely been mitigated by remedial actions such as groundwater pump and treat, ISCO, ISCR, and EISB injections, and by ex-situ thermal soil, and SVE treatment within the vadose zone. Further, inhalation risks have been addressed through substantial human health risk assessments based on decades of vapor intrusion monitoring performed by URS, AECOM, and Geosyntec. An LUC with supporting documents including a Site Management Plan will be prepared and submitted to the RWQCB for review to manage vapor intrusion risks that could arise as a result of redevelopment at the Site.

4.2.3 Unacceptable threats to Groundwater and Surface Water Resources, Considering Existing and Potential Beneficial Uses, are Mitigated

YES – Surface water resources are not at risk as a result of VOC impacts originating from the Site. Groundwater within the UPZ is used by the City for public drinking water purposes. The UPZ is protected based on the following:

1. Prior Mitigation and Remedial Actions – the destruction and sealing of the Ambassador Well eliminated the vertical conduit for downward migration of VOCs to the UPZ. Historical remedial actions have reduced or eliminated the majority of VOC impacts within the shallow water bearing zones which further reduces the risk to the UPZ.
2. 40-years of Groundwater Analytical Data - analytical data show low (below MCL) or non-detect concentrations of PCE for the past 20 years or more in the four UPZ wells. The last PCE detection above the MCL was in 2005 from well 47-01 at 5.6 µg/L, 20 years ago.
3. Predominant Upward Hydraulic Gradient - an upward hydraulic gradient between the UPZ and shallow zones that has persisted for most of the past 30 years.
4. Hydrostratigraphy – the presence of a 70-foot-thick aquitard between the bottom of Shallow Zone 5 (SZ5) groundwater and the top of the UPZ that serves to isolate the UPZ from shallow groundwater. Aquitards also separate each of the four water-bearing zones above SZ5.

Given the above rationale, the RWQCB approved no further sampling of the four UPZ wells in the 2024 revised MRP. The largest risk to the UPZ is the conduit that these wells provide for a potential release at ground surface to reach the UPZ directly.

4.3 Demonstrate that Residual Pollution in All Media Will Not Adversely Affect Present and Anticipated Land and Water Uses

4.3.1 Groundwater Plumes are Decreasing

YES – As shown in CGC’s Select VOCs & Interpreted PCE Distribution Figures for SZ1 through SZ4 included as Appendix D, the residual plume is stable and decreasing or collapsing as a result of remedial actions. To demonstrate plume decrease and confirm the final MNA component of the 2010 CAP is effective, MAROS, a statistical analysis software program, has been utilized since 2018 to understand groundwater concentration trends observed at the Site. The focus of the MAROS analysis is to organize concentration trends of groundwater analytical data collected at the Site and assess contaminant plume behavior trends in each groundwater zone (SZ1, SZ2, SZ3, SZ4 and the UPZ) over time. SZ5 was not analyzed as there is not a sufficient number of monitoring wells to run the analysis. The MAROS software is equipped with a module that performs statistical concentration trend analysis using both Mann-Kendall (a non-parametric statistical method) and Linear Regression (a parametric statistical method) analyses. The concentration trend analytical module allows for concentration trend analysis of data gathered from individual groundwater monitoring wells.

Based on the strength of statistical results derived by either statistical method, the concentration trend results are separated into six categories:

1. Decreasing (D);
2. Probably Decreasing (PD);
3. Stable (S);
4. No Trend (NT);
5. Probably Increasing (PI); and
6. Increasing (I).

A complete statistical trend analysis is provided in Appendix E. A brief summary of the results of CVOC trends between 2016 and 2025 in the 41 wells (11 in SZ1, 13 in SZ2, 10 in SZ3, three in SZ4 and four in UPZ) that were evaluated by groundwater zone is provided as Table 3. Garden Street well 38-01, 53-01, and 62-01 were excluded from Table 3 based on the rationale provided in Section 3.3. Overall, the Mann-Kendall and Linear Regression statistical analytical results generally show concentration trends that indicate significant ‘decreasing’, ‘probably decreasing’ or ‘stable’ trends over time.

As shown in Table 3, some of the well locations evaluated are flagged with “Probably Increasing” or “Increasing” trends; however, these increases are largely related to dechlorination or have low detections, many of which are below the MCL.

4.3.2 Cleanup Standards Can be Met within a Reasonable Timeframe

YES –21 of 40 wells within SZ1 through SZ5 and the UPZ included in this evaluation are below the MCL for PCE.

As documented in the RWQCB approved 2010 CAP, ex-situ evaporative desorption treatment was the preferred remedial remedy to treat the source and bioremediation followed by MNA was the preferred remedial remedy for groundwater. Based on the high level of effectiveness of ex-situ evaporative desorption treatment and EISB remedial actions, the project has transitioned to MNA which is the final component of the 2010 CAP.

As part of the 2010 CAP, groundwater modeling was performed to evaluate the long-term effects of MNA treatment technology after source removal and EISB were performed within accessible areas. MNA components simulated through modeling included biodegradation as well as retardation, dilution, and dispersion. The forecasted PCE plume within SZ1 and SZ2 was illustrated on a series of time series plume simulations prepared using the United States Geological Survey's (USGS) MODFLOW modeling software. Figures 25 and 26 compare the predicted plume in 2030 to the current plume based on fall 2025 data. These figures indicate that the 2010 groundwater model accurately predicted the SZ1 and SZ2 groundwater plumes following source area remediation, EISB treatment and MNA indicating that the 2010 groundwater model is another line of evidence demonstrating that cleanup goals have been met or will be reached within a reasonable time frame under MNA conditions.

During semi-annual groundwater monitoring events, Mission has monitored eight to nine groundwater monitoring wells within SZ1 to SZ3 to demonstrate that groundwater conditions in the vicinity of the EISB treatment footprint are supportive of anaerobic biotic dechlorination under MNA conditions. The majority of field geochemical parameters measured during monitoring including pH, DO, and ORP have historically and recently been at levels that indicate groundwater conditions continue to be supportive of anaerobic biotic dechlorination.

4.3.3 Risk Management Measures are Appropriate, Documented and Do Not Require Future Water Board Oversight

NOT AT THIS TIME – On-Site risk management measures will be developed as part of a draft Land Use Covenant for RWQCB review that will be finalized at the conclusion of SVE rebound testing and groundwater monitoring at SZ1 well 23-03. No risk management measures or RWQCB oversight are required for off-Site areas.

5.0 CONCLUSIONS

The Site conditions were evaluated against the three general criteria from the LTC Guidance as follows:

1. Pollutant sources are identified and evaluated, Site is adequately characterized, and environmental risks are identified and assessed

Investigation activities began in the mid-1980s that indicated VOCs, primarily PCE, were released into the subsurface through spills at the Site. PCE was released in the subsurface largely through the Ambassador Well, a private water supply well at the Site. The Ambassador Well annular space was reportedly sealed with gravel that created a conduit for PCE to migrate through five water-bearing zones not used for drinking water. Low levels of PCE did reach the UPZ that has been used as a water resource.

Mitigation and remedial efforts were initiated soon after discovery of the release and the Ambassador Well was destroyed and sealed. This eliminated the conduit for further PCE migration to the deeper water bearing zones. Characterization of the affected water bearing zones was completed over an approximate ten-year period between 1988 and 1998. Approximately 40 years of monitoring from a robust groundwater monitoring well, soil vapor probe and indoor air sampling network have assessed the lateral and vertical extent, and reduction of VOCs in six water bearing zones, the vadose zone and indoor air. The VOC reductions are based in multiple and extensive remedial and mitigation efforts utilizing the best available technologies over decades. The exposure pathway to the UPZ was eliminated decades ago. Off-Site vapor intrusion risk has been determined to be either within or below the risk management range and the RWQCB has approved suspension of the VI monitoring program.

2. Pollutant sources have been remediated to the extent feasible and practicable

The pollutant source was PCE releases from historic dry-cleaning operations at the Site. Further, the Ambassador Well served as a secondary release mechanism that allowed VOC impacts to migrate to the deeper water-bearing zones. The Ambassador Well-related releases were mitigated by the destruction and sealing that eliminated the conduit for PCE vertical migration. Source area soil impacts within the vadose zone and the entire SZ1 saturated interval was excavated and treated via ex-situ thermal desorption pursuant to the RWQCB-approved 2010 CAP.

Multiple phases of remedial actions have been completed under RWQCB oversight over a nearly 40-year time interval. The best remedial technologies available at the time were used to reduce or eliminate VOCs in the immediate source area and within the extent of the dissolved phase plumes underlying commercial and residential properties and City right-of-ways. These remedial technologies have included groundwater extraction and treatment, SVE, ex-situ thermal desorption, and multiple phases of ISCO, ISCR and EISB.

The RWQCB-approved 2010 CAP included the ex-situ thermal desorption and EISB technologies followed by MNA. These remedial technologies have been successfully implemented and documented over the past 15 years along with the prior interim remedial actions (GWET, SVE, ISCO and ISCR). SSD mitigation was initiated in 2021 at an adjacent property to address vapor intrusion concerns. The RWQCB approved suspension of SSD in 2025 following rebound testing results demonstrating that further SSD operation is not necessary. A second phase of SVE was initiated in both on-Site and off-Site areas in 2022. The RWQCB approved suspension of off-Site SVE in 2025 after soil vapor rebound testing demonstrated that VOC concentrations in the off-Site target area had been reduced to stable concentrations well below site-specific cleanup goals. A review of the historical data set and current Site conditions indicate that remediation has been performed to the extent feasible and practicable with the best available technologies available at the time in consultation with, and approvals from, the RWQCB for all Mission-related VOC impacted media.

3. Groundwater plumes are decreasing, cleanup standards can be met within a reasonable time frame and unacceptable risks have been mitigated

The termination point of the dissolved phase plume has been observed based on long term-groundwater monitoring data to be in the vicinity of Garden and East Haley Streets. The plume is not expanding and stable. The magnitude of VOC impacts is decreasing and will continue to decrease as a result of the extensive remedial actions and ongoing MNA. The majority of residual VOC impacts are limited to SZ1 and SZ2 and are near or below the MCL with stable or decreasing trends that have been evaluated with MAROS statistical analysis. Groundwater modeling performed for SZ1 and SZ2 as part of the 2010 CAP forecasted the residual PCE plumes for these zones after source area remediation, EISB treatment and MNA. A comparison of the current plume in 2025 to the modeled plume in 2030 on Figures 25 and 26 indicates that the 2010 model was representative of the residual plume after source area remediation, EISB treatment and MNA. This groundwater modeling is another line of evidence supporting that cleanup goals in SZ1 and SZ2 already have or will be reached within a reasonable time frame under MNA conditions.

Aquitards between SZ3 through SZ5 inhibit vertical movement of VOCs between SZ1 through SZ4 and a 70-foot thick aquitard between SZ5 and the UPZ further impedes any remaining VOCs from reaching the UPZ. Further, an upgradient hydraulic gradient has persisted for most of the past 30 years. Groundwater monitoring has shown that PCE has been below MCL or non-detect at all UPZ monitoring wells for the past 20 years. The RWQCB approved discontinued sampling of the UPZ wells after the 2023 monitoring event. In January 2025, the RWQCB approved discontinuation of the Site-wide vapor intrusion monitoring program. VOC-impacts in indoor air, soil vapor and groundwater have been reduced to levels that no longer pose an unacceptable risk to human health or water resources.

The Site is located in downtown Santa Barbara in an area with numerous non-Mission PCE sources exist in up- or cross-gradient areas relative to the Site. Additionally, the heavily damaged sewer system is present near the termination of the dissolved phase plume. The sewer system and up-sewer flow PCE dischargers have distributed non-Mission PCE and VOCs along the sewer system and related utility corridor. Additionally, an ongoing, unknown upgradient PCE source in SZ3 has been contributing to PCE impacts beneath the Mission property for at least 30 years. The extensive remedial and mitigation efforts over the past nearly 40 years have reduced Mission-related VOCs to levels below or similar to the residual non-Mission VOC impacts in the area.

Remedial efforts have been challenged based on the fact that VOC impacts are beneath City right-of-ways, and numerous mixed residential and commercial properties. Mission has worked cooperatively with off-Site property owners to apply remedial technologies in all accessible area at considerable effort and cost including identifying innovative remedial technologies, designing treatment footprints and substrate dosage, and negotiating access agreements to perform the extensive remedial actions documented in this report. Knowing the challenges of addressing off-Site VOC impacts, Mission was proactive at implementing remediation as properties being transferred or redeveloped which allowed increased access for remedial work. Examples of such actions are EISB and ISCR actions performed at 219 and 235 East Haley Street and 513 Garden Street.

Multiple phases of investigation, remediation, and mitigation actions have significantly reduced VOC mass in soil and groundwater underlying the Site. The performance of these actions has been assessed by the groundwater monitoring program which began in 1988 and vapor monitoring program that began in 2009. Approximately 40 years of groundwater monitoring data and MNA evaluation have shown that the off-Site groundwater plume has been remediated to the extent feasible and practicable and human health risks have been mitigated. All actions have been performed with consultation and approval from the RWQCB, which has provided regulatory oversight of this project. As described in Section 2.4, Geosyntec recommended no further action related to off-Site VI monitoring, VI mitigation and vadose zone remediation and the RWQCB has approved the suspension of these activities, but a formal NFA determination has not been issued.

6.0 RECOMMENDATIONS

The results of the LTC evaluation documented herein indicate that additional work needs to be conducted on-Site to meet the RWQCB low-threat closure criteria, but that all off-Site areas meet LTC criteria and the off-Site groundwater monitoring well and soil vapor probe network can be destroyed along with on-Site monitoring wells that meet the LTC criteria. Below are Mission's recommendations:

1. NFA is recommended for all off-Site areas and the RWQCB issues a formal NFA decision for off-Site soil, soil vapor and groundwater.
2. Prepare a work plan for destruction of all groundwater monitoring wells except for SZ1 well 23-03 and all off-Site soil vapor probes. Geosyntec will prepare a work plan for decommissioning the SSD system and off-Site HSVE well. Transfer of SZ1 monitoring wells to appropriate responsible parties located along the heavily damaged City sewer system and related utility corridor with non-Mission VOCs can be facilitated by the RWQCB, if needed. Figures 27 and 28 show the groundwater monitoring wells and soil gas sampling locations proposed for destruction.
3. Continued groundwater monitoring at on-Site SZ1 well 23-03 to further evaluate the residual cis-1,2-DCE and vinyl chloride at this location.
4. Continue operating the SVE system targeting on-Site soil vapor probe SG-35 where elevated VOCs remain. When asymptotic VOC concentrations are observed at SG-35, shut down the SVE system and conduct a rebound test at that location. If no significant rebound occurs, prepare and submit an SVE Implementation Completion Report pursuant to the RWQCB's January 2025 Letter.
5. Prepare a draft Land Use Covenant for the Mission property with supporting documents including a Site Management Plan for review by the RWQCB in anticipation of redevelopment of the property, similar to the 219 East Haley development that is nearing completion. The HSVE Implementation Completion Report and final Vapor Conditions Report requested by the RWQCB in the January 2025 Letter will be prepared once on-Site HSVE is complete. Geosyntec will begin preparation of the off-Site portion of the Vapor Conditions Report, including a figure(s) showing the most recent COPC results in soil vapor at each off-Site location, to be finalized and submitted once on-Site HSVE is complete.

7.0 REFERENCES

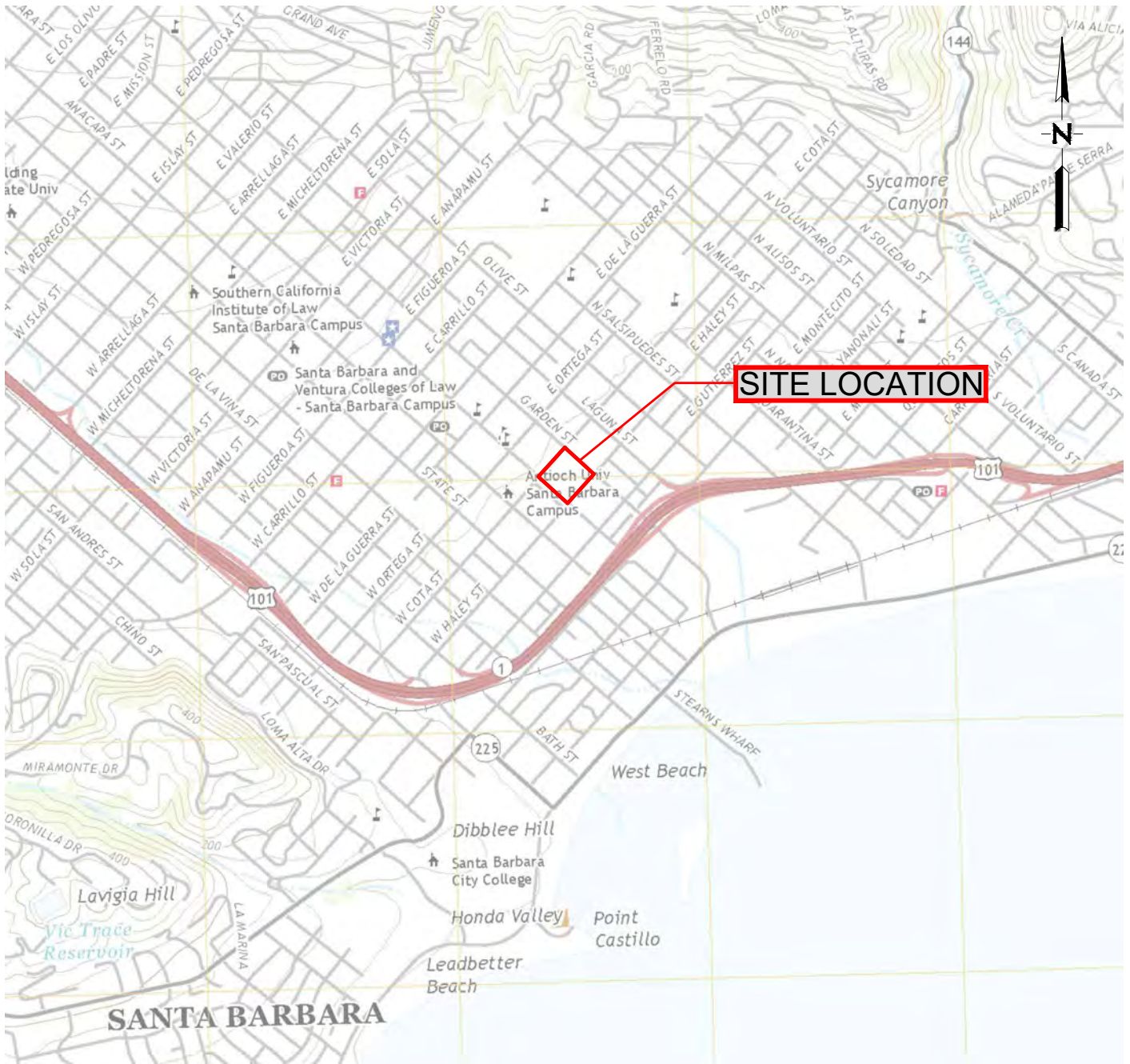
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8.0 LIMITATIONS

This document was prepared for the exclusive use of Mission and the RWQCB, and for the express purpose of complying with a client or regulatory directive for environmental investigation or restoration. Apex and Mission must approve any re-use of this work product in whole or in part for a different purpose or by others in writing. If any such unauthorized use occurs, it shall be at the user's sole risk without liability to Apex or Mission. To the extent that this report is based on information provided to Apex by third parties, including Mission, their direct contractors, previous workers, and other stakeholders, Apex cannot guarantee the completeness or accuracy of this information, even where efforts were made to verify third-party information. Apex has exercised professional judgment to collect and present findings and opinions of a scientific and technical nature. The opinions expressed are based on the conditions of the Site existing at the time of the field investigation, current regulatory requirements, and any specified assumptions. The findings and recommendations presented in this report are intended to be taken in their entirety to assist Mission and the RWQCB personnel in applying their own professional judgment in making decisions related to the property. Apex cannot provide conclusions on environmental conditions outside the completed scope of work. Apex cannot guarantee that future conditions will not change and affect the validity of the presented conclusions and recommended work. No warranty or guarantee, whether expressed or implied, is made with respect to the data or the reported findings, observations, conclusions, and recommendations.

FIGURES



REFERENCE LOCATION



Santa Barbara, California
 United States Geological Survey
 7.5 Minute Series Topographic Map
 Contour Interval: 40 feet
 Scale: 1 inch = 24,000 feet
 Date: 2022

SITE LOCATION MAP

MISSION LINEN SUPPLY
 FORMER AMBASSADOR LAUNDRY SITE
 SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	DECEMBER 2025	JP	EH

0 2,000 4,000
 HORIZONTAL SCALE IN FEET



3480 Buskirk Avenue, Suite 210
 Pleasant Hill, CA 94523



FIGURE
1

I:\Client\Mission Linen\93-25011167 Santa Barbara\02_05 Site Plan, PCE Impacts.dwg Modified 1/9/2026 by JPoore



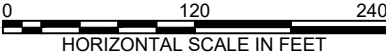
- LEGEND**
- Former Ambassador Building Outline (201 East Haley Street)
 - 61-01 Shallow Zone 1 Monitoring Well Location
 - 72-01 Shallow Zone 2 Monitoring Well Location
 - 56-01 Shallow Zone 3 Monitoring Well Location
 - 15-03 Shallow Zone 4 Monitoring Well Location
 - 52-03 Shallow Zone 5 Monitoring Well Location
 - 11-01 Upper Producing Zone Monitoring Well Location

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

**SITE PLAN WITH GROUNDWATER
MONITORING WELL LOCATIONS**

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	DECEMBER 2025	JP	EH

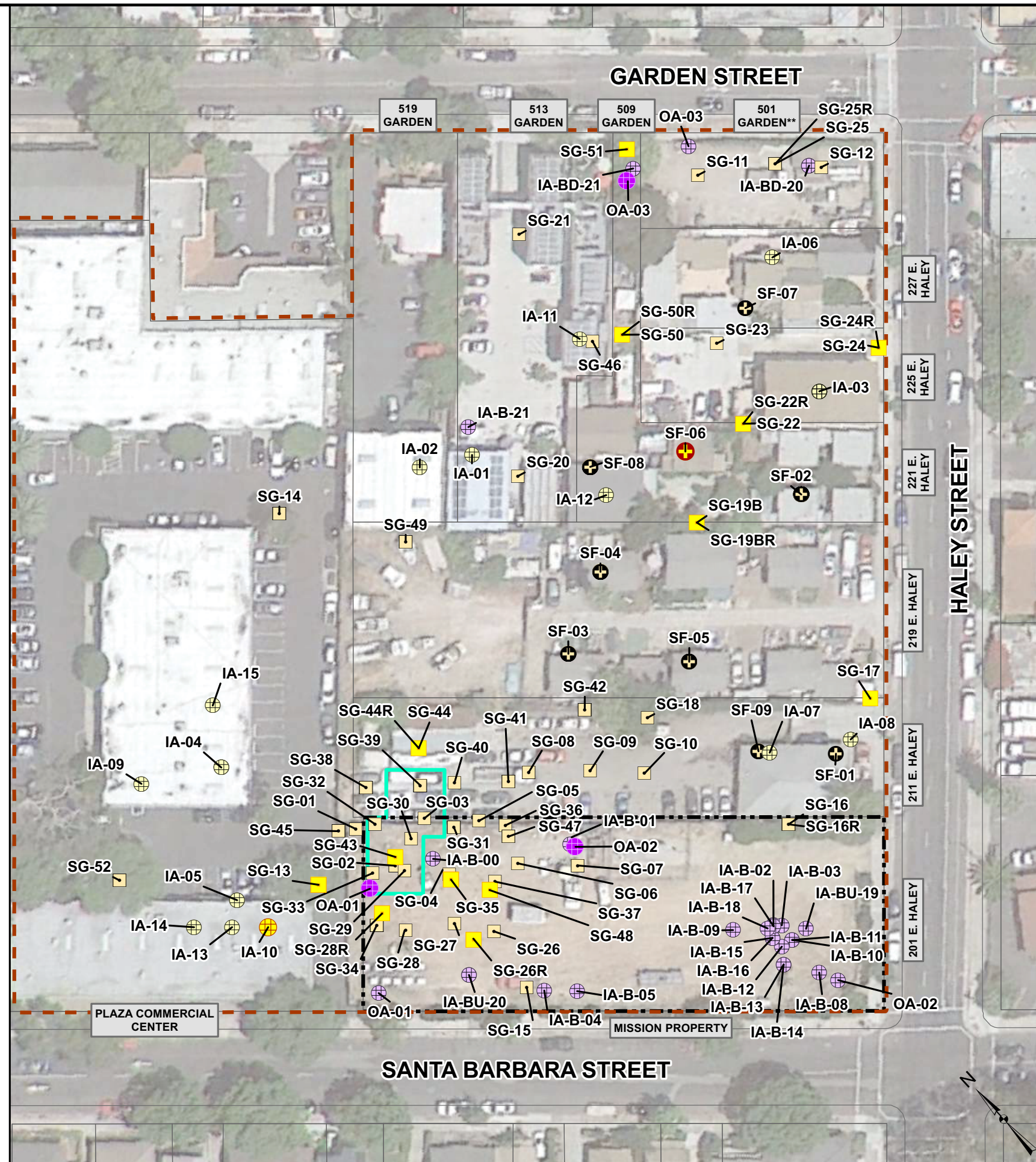


10775 Pioneer Trail, Suite 210
Truckee, CA 96161



**FIGURE
2**

I:\Client\Mission Linen\93-25011167 Santa Barbara\Figure 03 - Current and Historic Samples.dwg



Legend

- Summer 2024 Indoor Air Sampling Location
- Summer 2024 Subfloor Sampling Location
- Summer 2024 Soil Gas Sampling Location
- Summer 2024 Background Air Sampling Location
- Historic Indoor Air Sampling Location
- Historic Subfloor Sampling Location
- Historic Soil Gas Sampling Location
- Historic Background Air Sampling Location
- Excavation Area Limits
- Mission Property (201 East Haley Street)
- Site Boundary

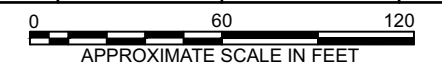
NOTES:

** : Previously 235 E. Haley Street

CURRENT AND HISTORIC VAPOR INTRUSION SAMPLING LOCATIONS

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	JANUARY 2026	Geosyntec	EH

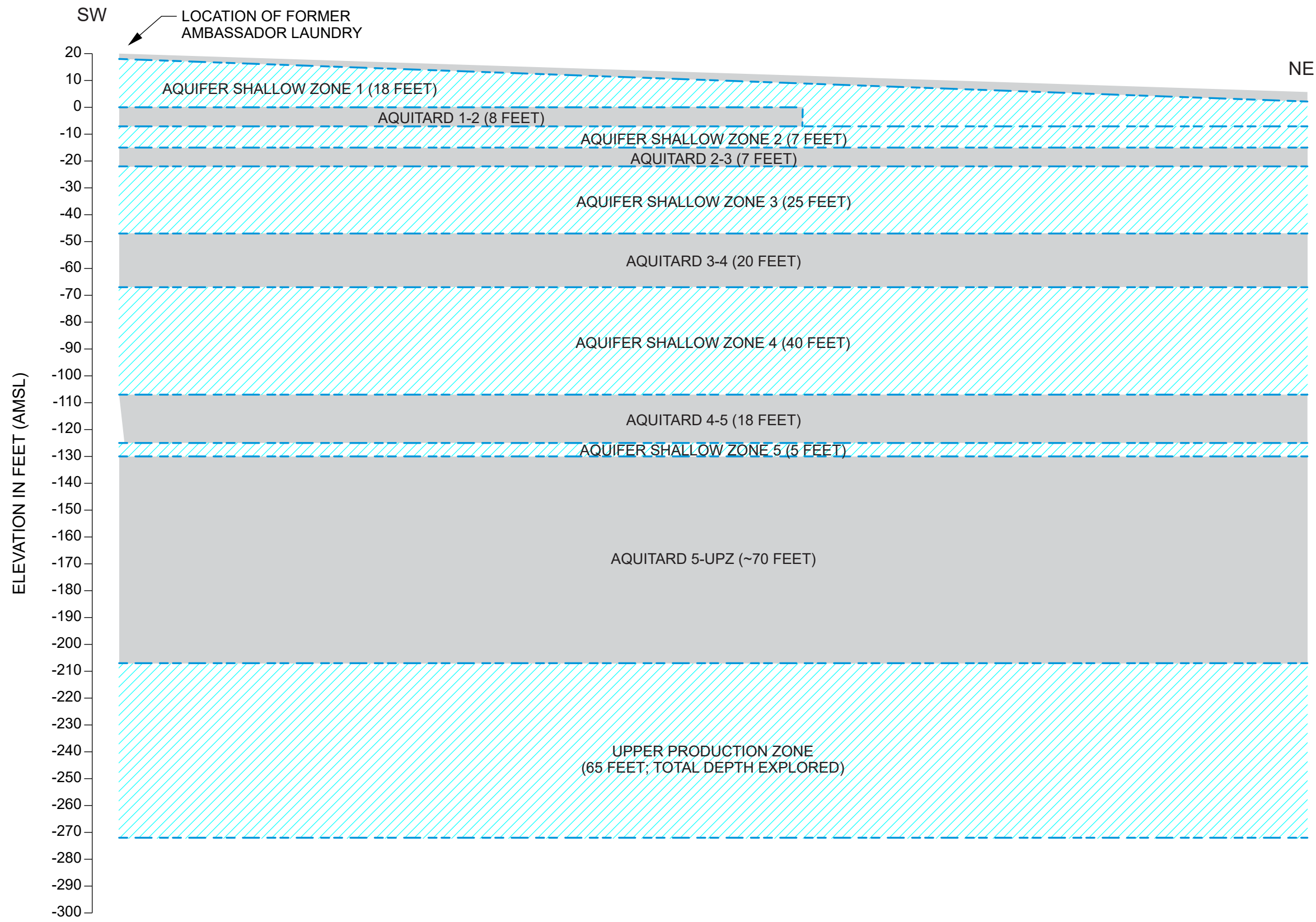


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FIGURE
3

I:\Client\Mission Linen\93-25011167 Santa Barbara\Figure 04 - Aquifers and Aquitards X-SEC.dwg



SOURCE: URS CORPORATION, MISSION LINEN SUPPLY, AMBASSADOR LAUNDRY SITE, SANTA BARBARA, CALIFORNIA.

**CROSS-SECTION WITH
AQUIFERS AND AQUITARDS**

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	DECEMBER 2025	JP	EH

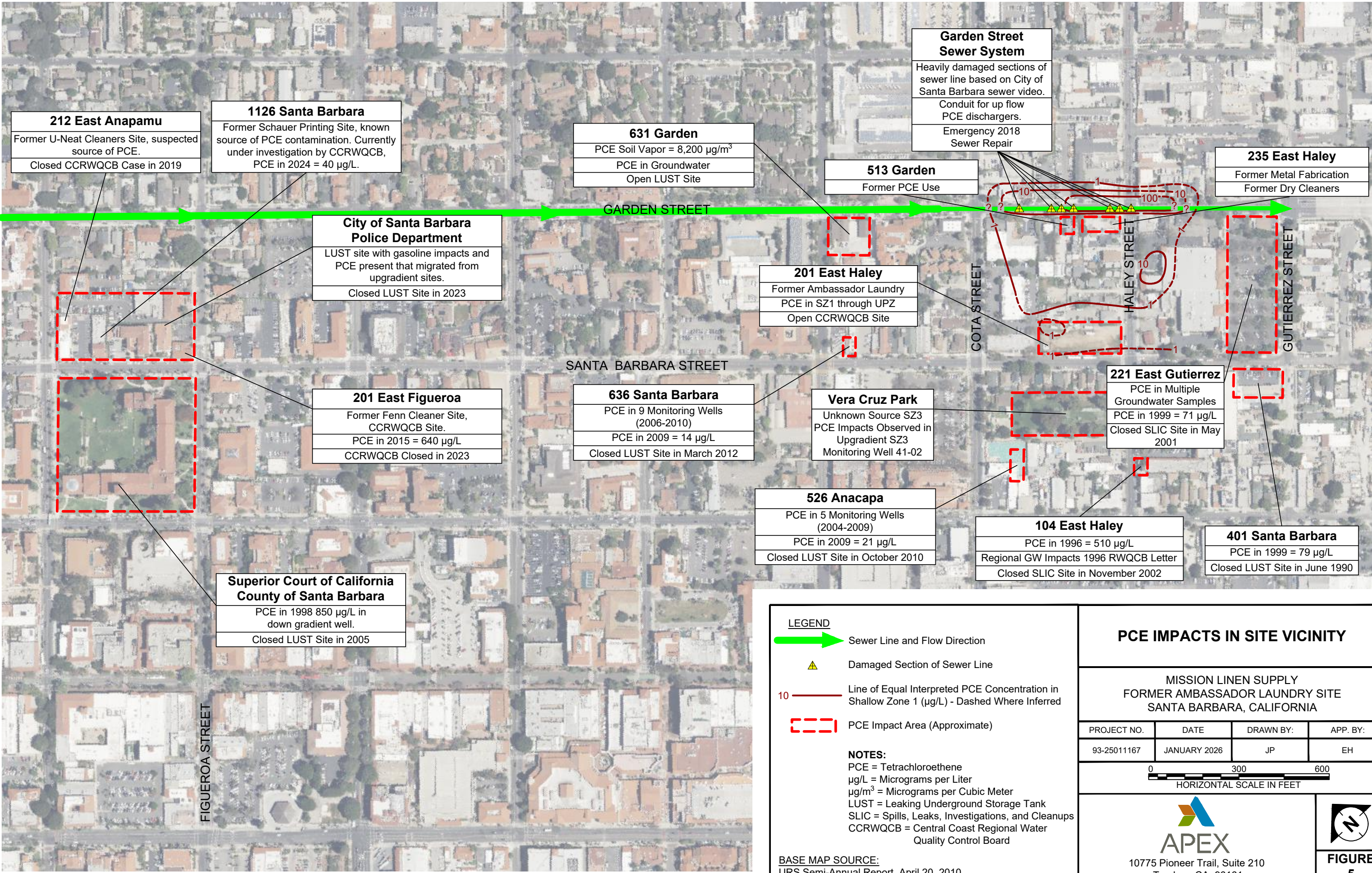
04080

APPROXIMATE SCALE IN FEET


APEX
10775 Pioneer Trail, Suite 210
Truckee, CA 96161

**FIGURE
4**

I:\Client\Mission Linen\93-25011167 Santa Barbara\02_05_27 Site Plan, PCE Impacts.dwg Modified 1/12/2026 by JPoore





***Well Destruction:
Ambassador Well
Destroyed
and Sealed
(1988)**

- LEGEND**
- Former Ambassador Building Outline (201 East Haley Street)
 - Shallow Zone 1 Monitoring Well Location
 - Shallow Zone 2 Monitoring Well Location
 - Shallow Zone 3 Monitoring Well Location
 - Shallow Zone 4 Monitoring Well Location
 - Shallow Zone 5 Monitoring Well Location
 - Upper Producing Zone Monitoring Well Location

Ambassador Well Location (Destroyed)

***Ambassador Laundry Supply Well Destroyed and Sealed in 1988 - Conduit That Provided Source Loading To All Water Bearing Zones Eliminated**

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
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APEX
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Truckee, CA 96161



FIGURE 6

**Groundwater
Extraction
Treatment
System
(GWETS):**
66,000,000
gallons of groundwater
treated during
operation
(1991-2003)

LEGEND

-  Former Ambassador Building Outline
(201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location

 Groundwater Extraction
Well Locations (1991-2003)

BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2003)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

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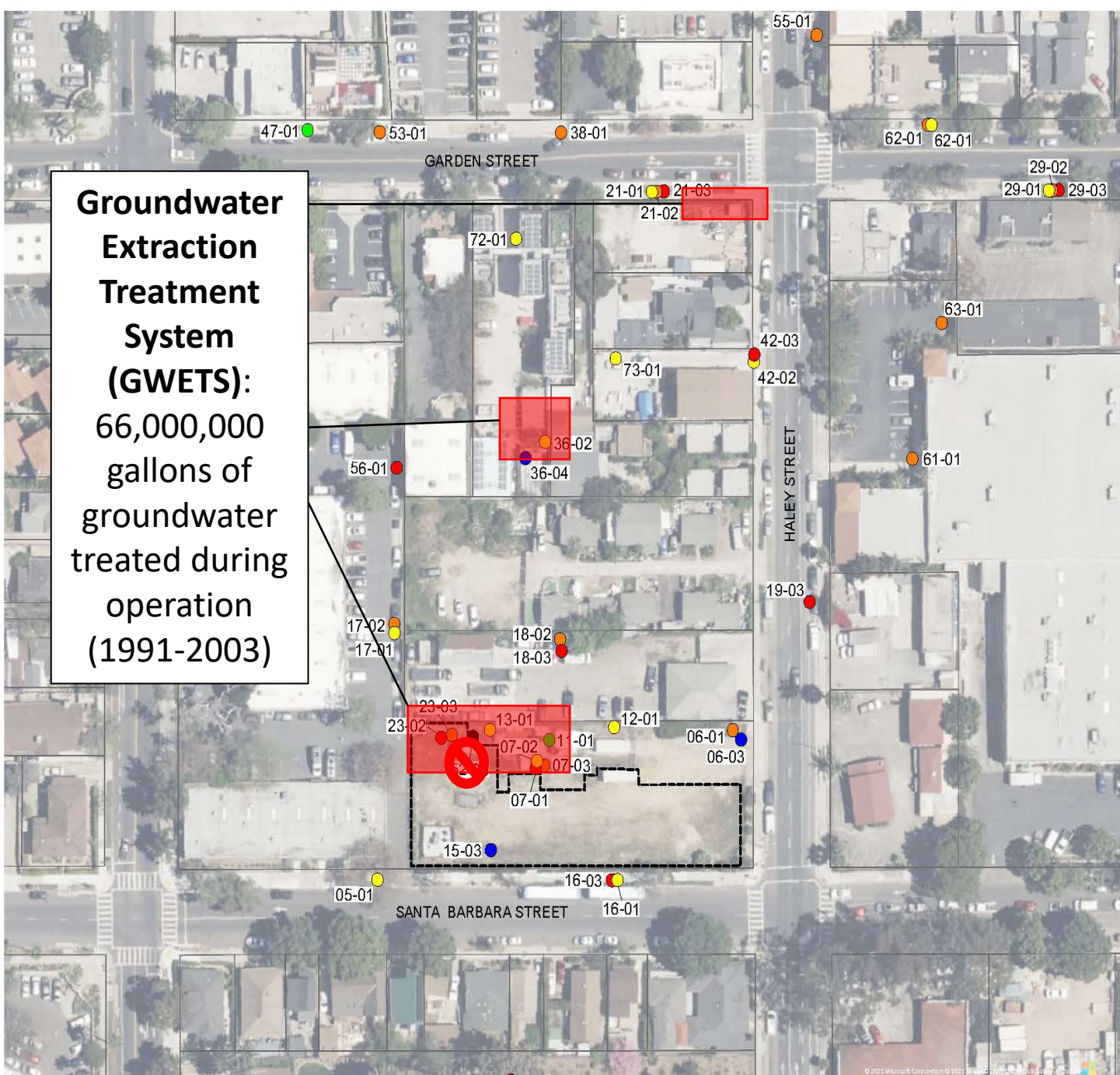
0 75 150
APPROXIMATE SCALE IN FEET



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FIGURE
7



**Soil Vapor
Extraction
(SVE): Mass
Removal Not
Estimated
(1992 – 2002)**

LEGEND

-  Former Ambassador Building Outline (201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location

 Groundwater Extraction Well Locations (1991-2003)

 SVE Operation (1992 – 2002)

BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2002)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

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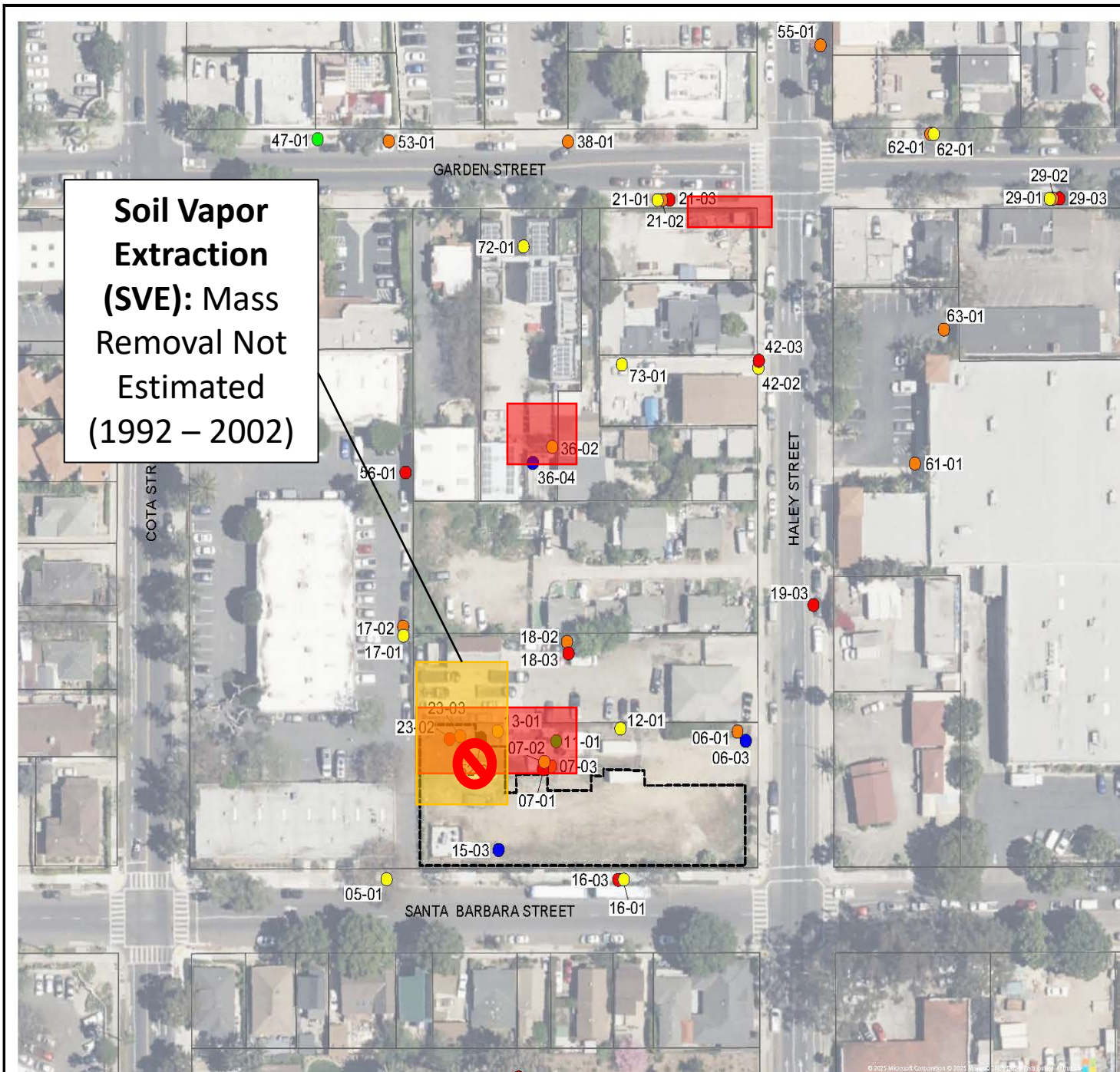
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APPROXIMATE SCALE IN FEET



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Truckee, CA 96161

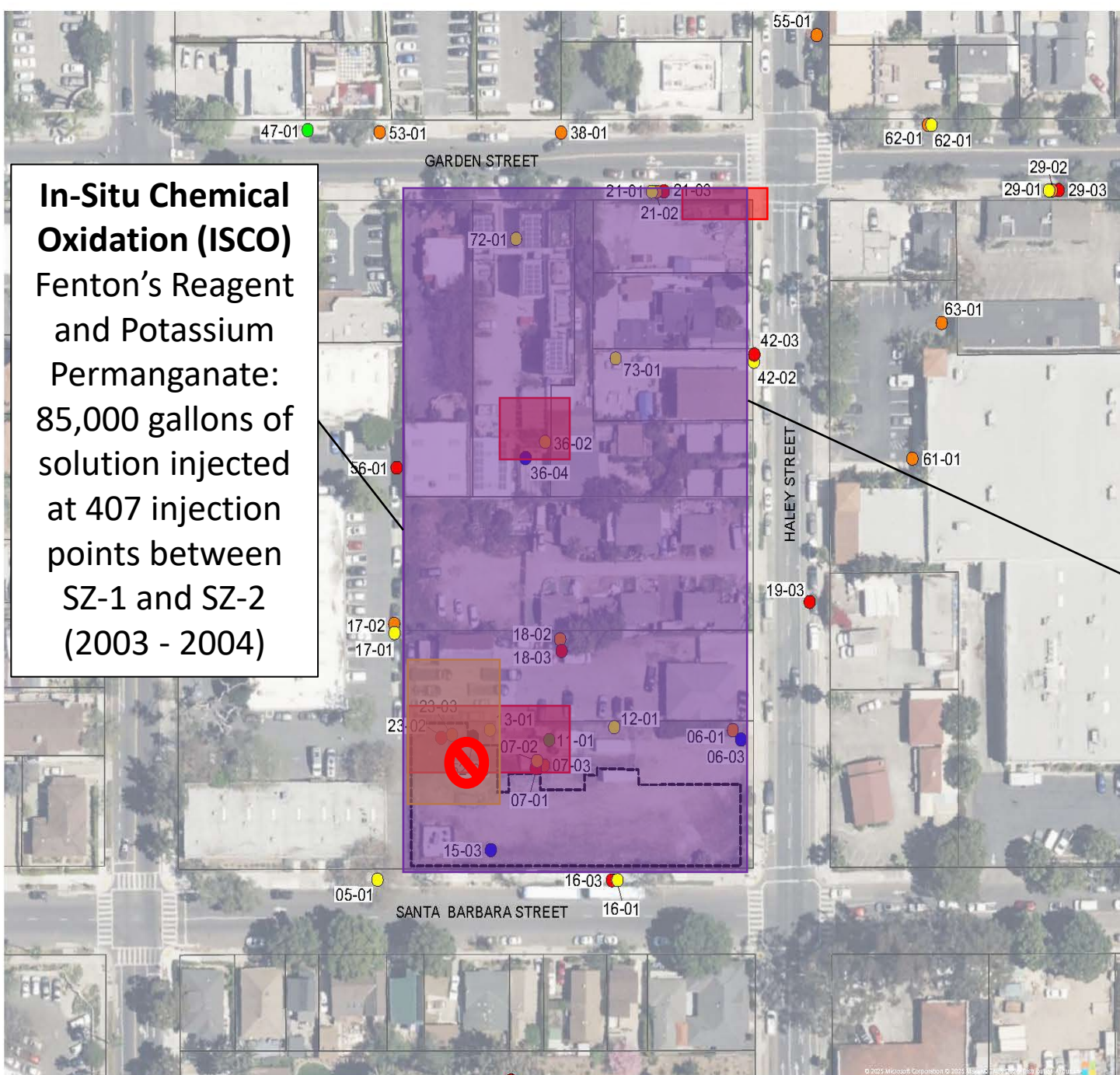


**FIGURE
8**



In-Situ Chemical Oxidation (ISCO)

Fenton's Reagent and Potassium Permanganate:
85,000 gallons of solution injected at 407 injection points between SZ-1 and SZ-2 (2003 - 2004)

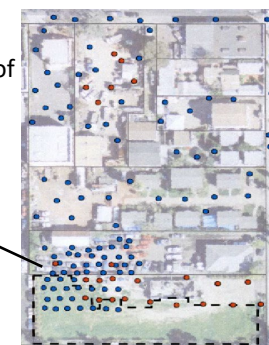


LEGEND

- Former Ambassador Building Outline (201 East Haley Street)
- Shallow Zone 1 Monitoring Well Location
- Shallow Zone 2 Monitoring Well Location
- Shallow Zone 3 Monitoring Well Location
- Shallow Zone 4 Monitoring Well Location
- Shallow Zone 5 Monitoring Well Location
- Upper Producing Zone Monitoring Well Location

- Groundwater Extraction Well Locations (1991-2003)
- SVE Operation (1992 - 2002)
- ISCO (2003 - 2004)

Example of Injection Point network

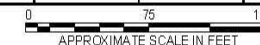


BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2004)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

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Truckee, CA 96161



FIGURE
9

**Enhanced In-Situ
Bioremediation
(EISB): 26,000
gallons of
Emulsified
Vegetable Oil
(EVO) at 84
location between
SZ-1 and SZ-2
(2007)**

LEGEND

-  Former Ambassador Building Outline (201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location

-  Groundwater Extraction Well Locations (1991-2003)
-  SVE Operation (1992 – 2002)
-  ISCO (2003 – 2004)
-  EISB (2007)

BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2007)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

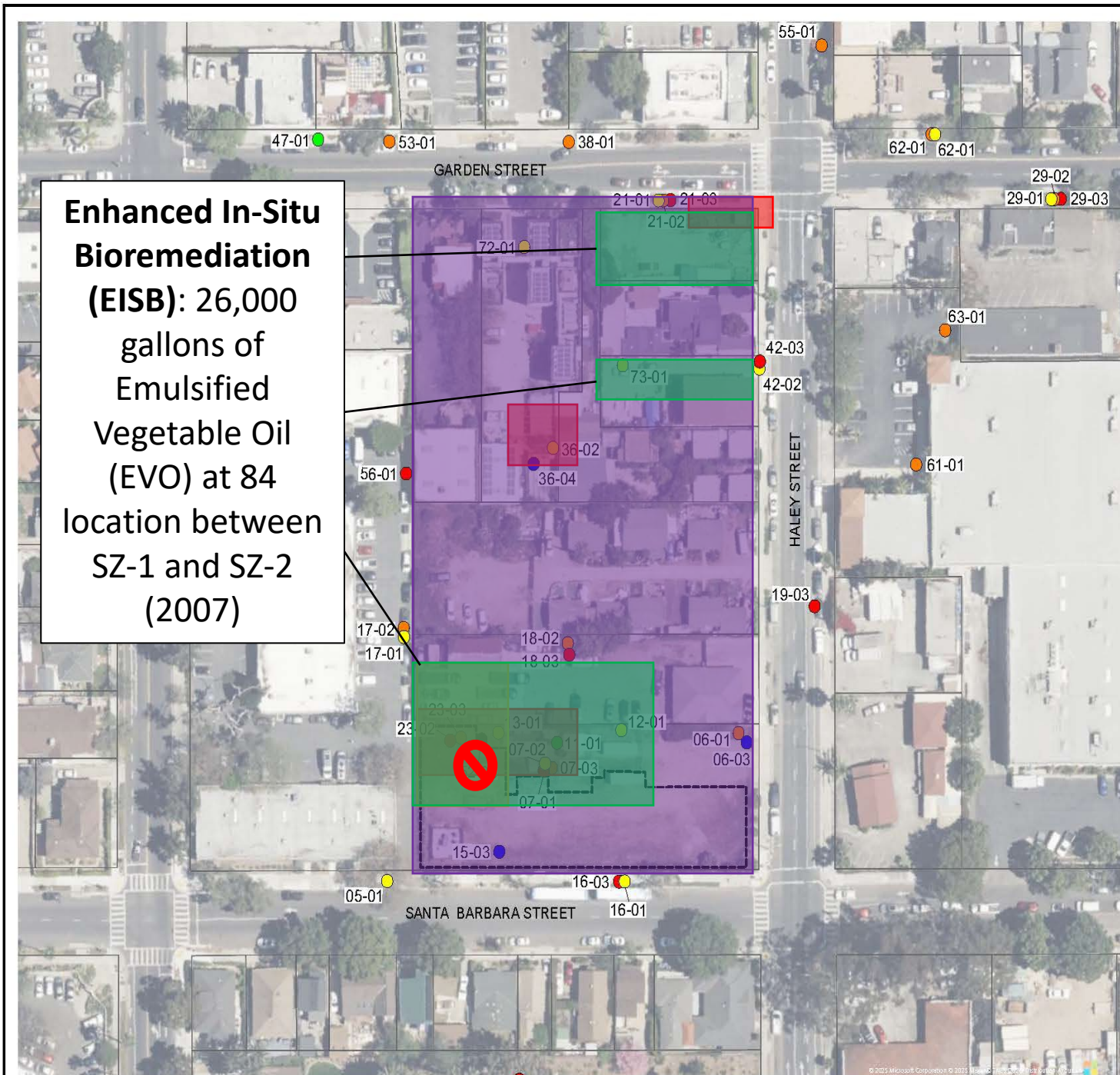
PROJECT NO.	DATE	DRAWN BY:	APP. BY:
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Truckee, CA 96161



**FIGURE
10**



**In-Situ Chemical
Reduction (ISCR):**
4,170 lbs. of BOS
100 Carbon-ZVI
injected at 46
locations within
SZ-1
(2008)

LEGEND

-  Former Ambassador Building Outline
(201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location

-  Groundwater Extraction
Well Locations (1991-2003)
-  SVE Operation (1992 – 2002)
-  ISCO (2003 – 2004)
-  EISB (2007)
-  ISCR (2008)

BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2008)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

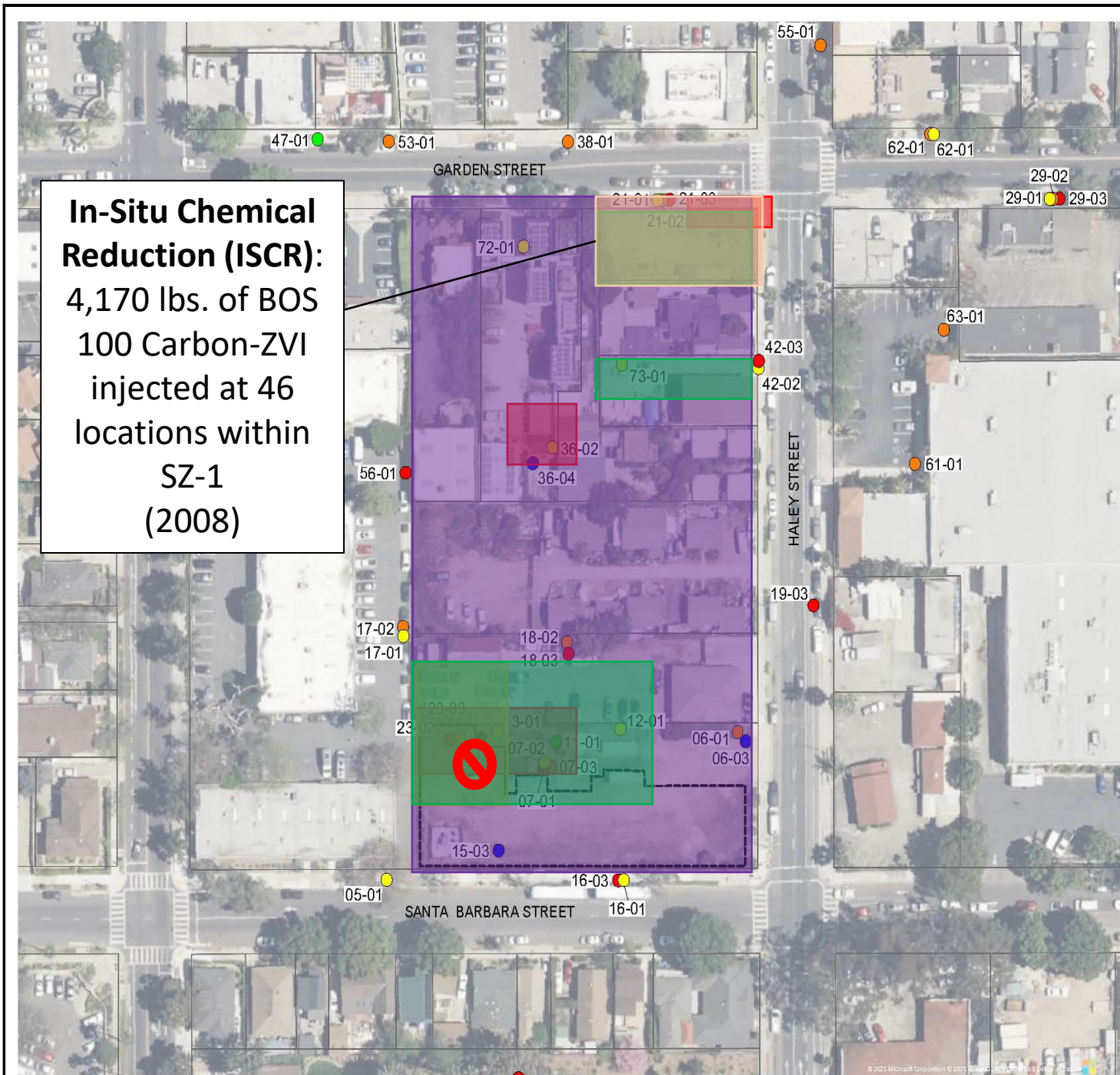
PROJECT NO.	DATE	DRAWN BY:	APP. BY:
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**FIGURE
11**



**EISB: 25,180
gallons of EVO
injected into SZ-1
and SZ-2
(2012)**

LEGEND

-  Former Ambassador Building Outline
(201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location

-  Groundwater Extraction
Well Locations (1991-2003)
-  SVE Operation (1992 – 2002)
-  ISCO (2003 – 2004)
-  EISB (2007)
-  ISCR (2008)
-  Source Area Excavation
(2011)
-  EISB (2012)

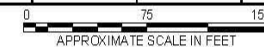
BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2012)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

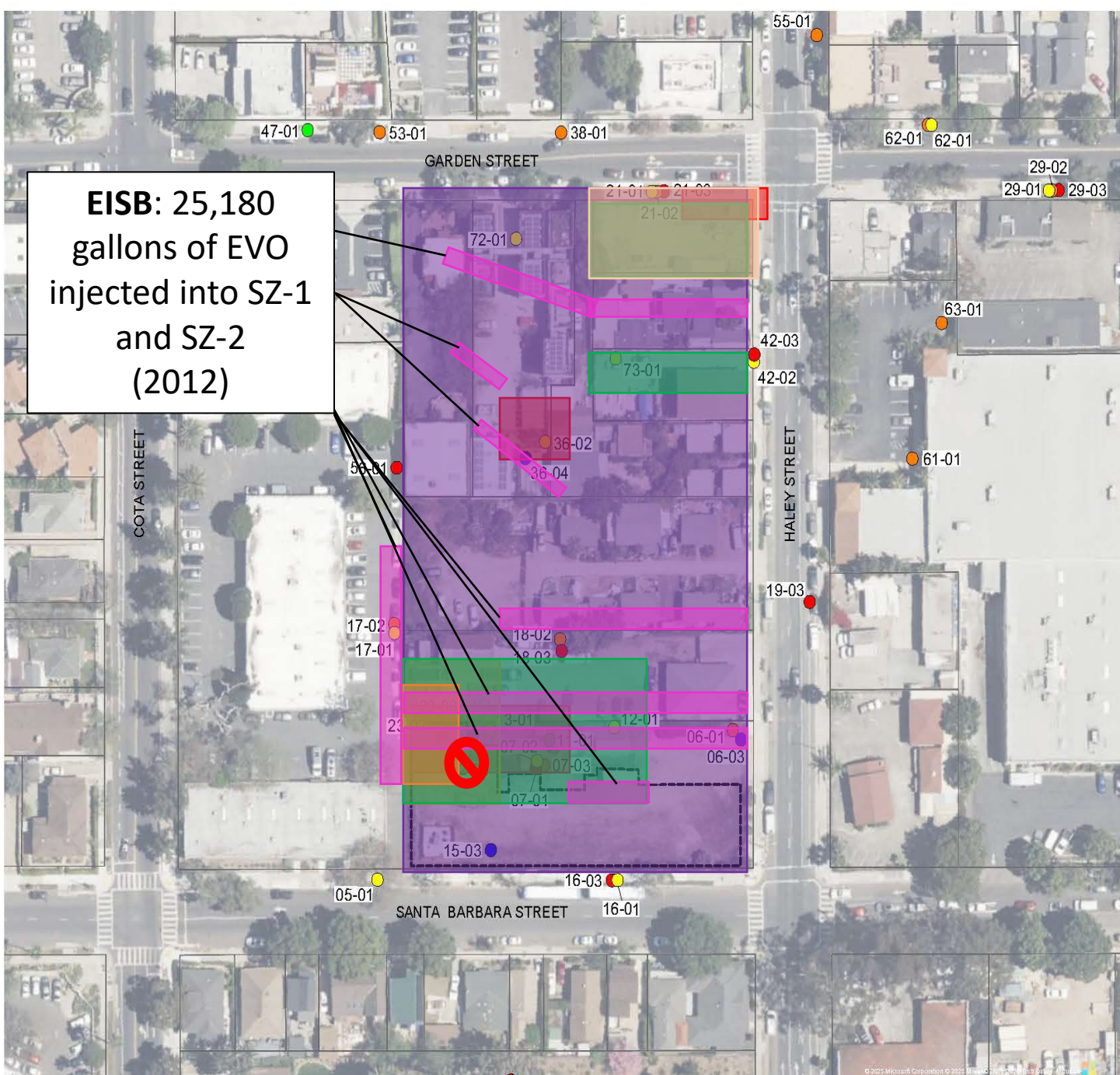
PROJECT NO.	DATE	DRAWN BY:	APP. BY:
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Truckee, CA 96161



**FIGURE
13**



EISB: 31,168
gallons of EVO
injected into SZ-1,
SZ-2, and SZ-3
(2014)

LEGEND

-  Former Ambassador Building Outline
(201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location

-  Groundwater Extraction
Well Locations (1991-2003)
-  SVE Operation (1992 – 2002)
-  ISCO (2003 – 2004)
-  EISB (2007)
-  ISCR (2008)
-  Source Area Excavation
(2011)
-  EISB (2012)
-  EISB (2014)

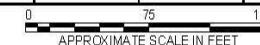
BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2014)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

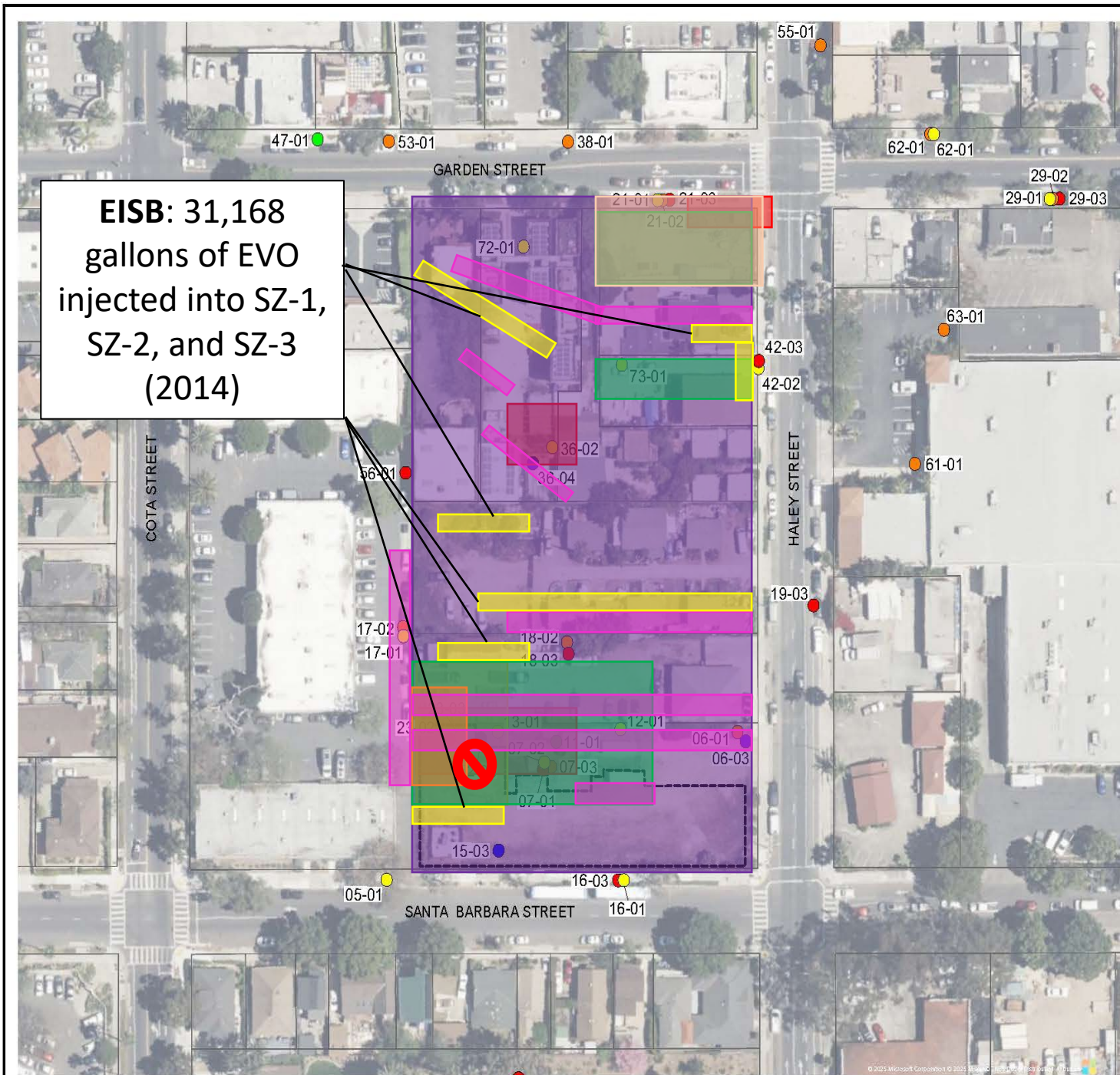
PROJECT NO.	DATE	DRAWN BY:	APP. BY:
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**FIGURE
14**



EISB: 45,339
gallons of EVO
injected into SZ-1,
SZ-2, and SZ-3
(2017)

LEGEND

-  Former Ambassador Building Outline
(201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location

-  Groundwater Extraction
Well Locations (1991-2003)
-  SVE Operation (1992 – 2002)
-  ISCO (2003 – 2004)
-  EISB (2007)
-  ISCR (2008)
-  Source Area Excavation
(2011)
-  EISB (2012)
-  EISB (2014)
-  EISB (2017)

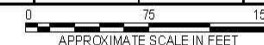
BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2017)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

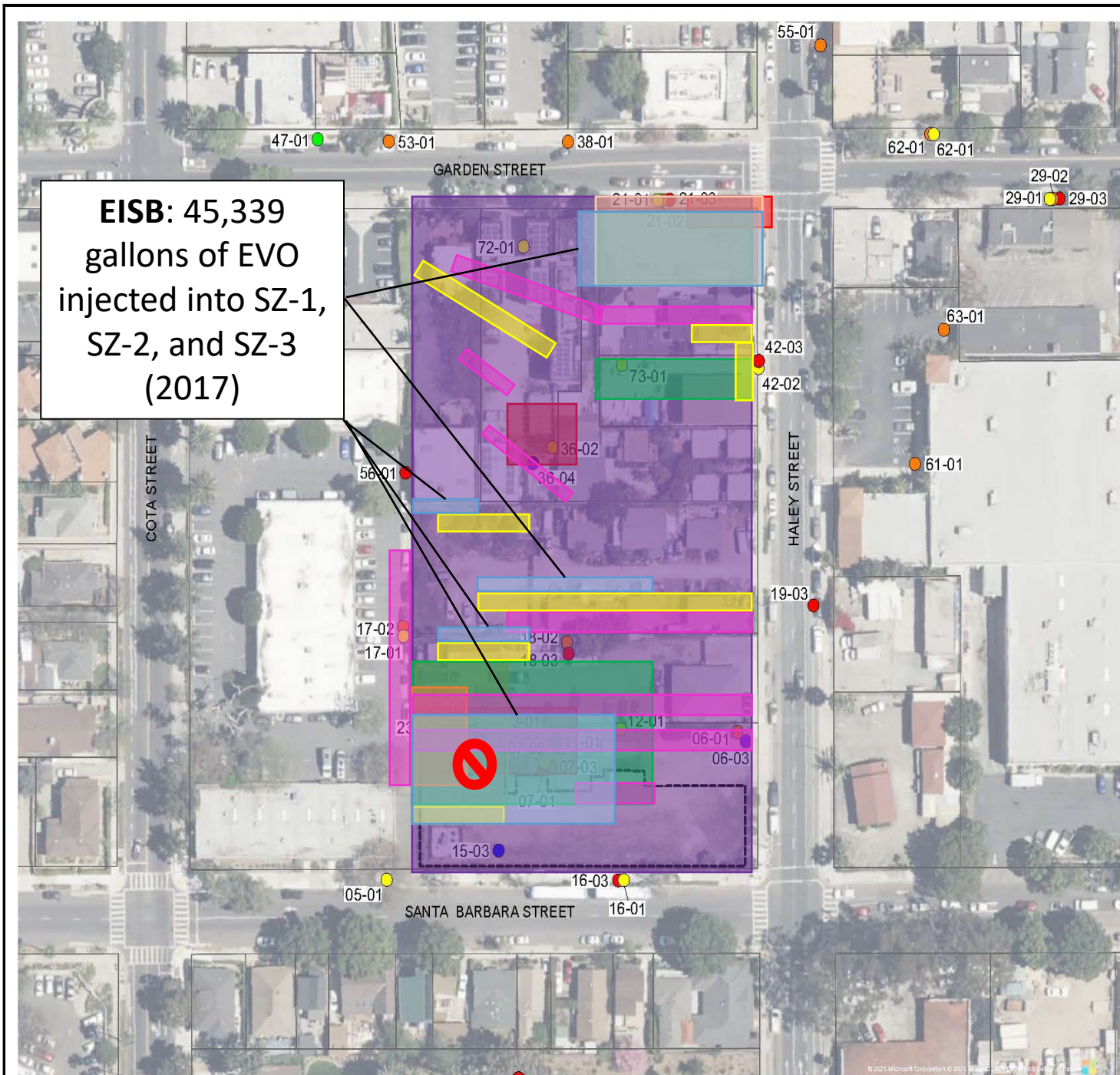
PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	JANUARY 2026	MG/JP	EH



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Truckee, CA 96161



**FIGURE
15**



EISB: 1,335 gallons of EVO, 616 lbs. of ZVI, and 8.4 Liters of Microbial Suspension injected into SZ-1, SZ-2, and SZ-3 (2021)

LEGEND

- Former Ambassador Building Outline (201 East Haley Street)
- Shallow Zone 1 Monitoring Well Location
- Shallow Zone 2 Monitoring Well Location
- Shallow Zone 3 Monitoring Well Location
- Shallow Zone 4 Monitoring Well Location
- Shallow Zone 5 Monitoring Well Location
- Upper Producing Zone Monitoring Well Location

- Groundwater Extraction Well Locations (1991-2003)
- SVE Operation (1992 – 2002)
- ISCO (2003 – 2004)
- EISB (2007)
- ISCR (2008)
- Source Area Excavation (2011)
- EISB (2012)
- EISB (2014)
- EISB (2017)
- EISB (2021)

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

Summary of Remedial Actions (1988-2021)

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	JANUARY 2026	MG/JP	EH

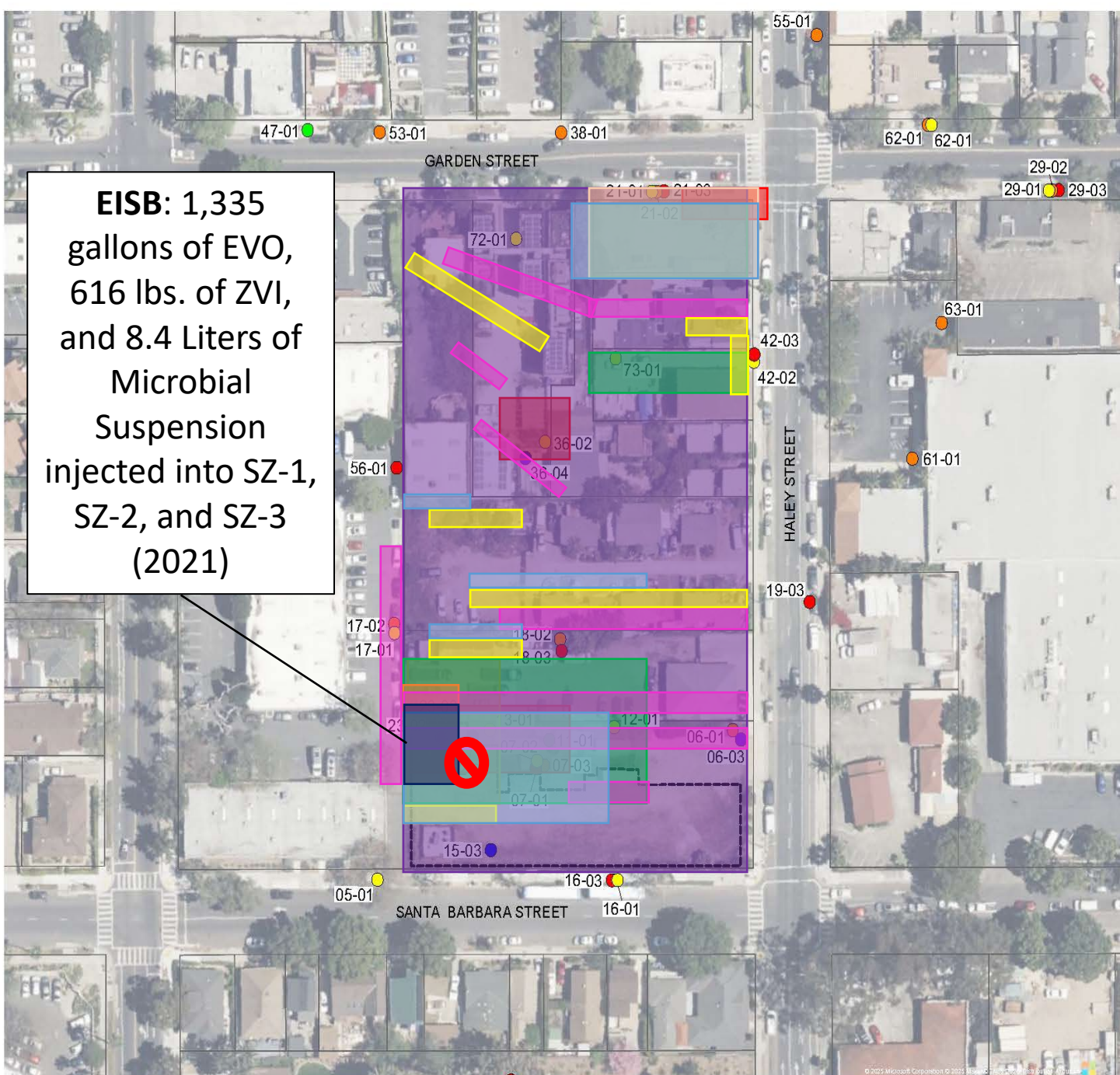
0 75 150
APPROXIMATE SCALE IN FEET



10775 Pioneer Trail, Suite 210
Truckee, CA 96161



FIGURE
16



SVE:

Approximately
15.2 lbs. of PCE
removed
(2022 - 2025)

LEGEND

-  Former Ambassador Building Outline
(201 East Haley Street)
-  Shallow Zone 1 Monitoring Well Location
-  Shallow Zone 2 Monitoring Well Location
-  Shallow Zone 3 Monitoring Well Location
-  Shallow Zone 4 Monitoring Well Location
-  Shallow Zone 5 Monitoring Well Location
-  Upper Producing Zone Monitoring Well Location
-  Groundwater Extraction
-  Well Locations (1991-2003)
-  SVE Operation (1992 - 2002)
-  ISCO (2003 - 2004)
-  EISB (2007)
-  ISCR (2008)
-  Source Area Excavation
(2011)
-  EISB (2012)
-  EISB (2014)
-  EISB (2017)
-  EISB (2021)
-  SVE (2022 - 2026)

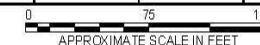
BASE MAP SOURCE:

URS Semi-Annual Report, April 20, 2010

**Summary of Remedial Actions
(1988-2026)**

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	JANUARY 2026	MG/JP	EH

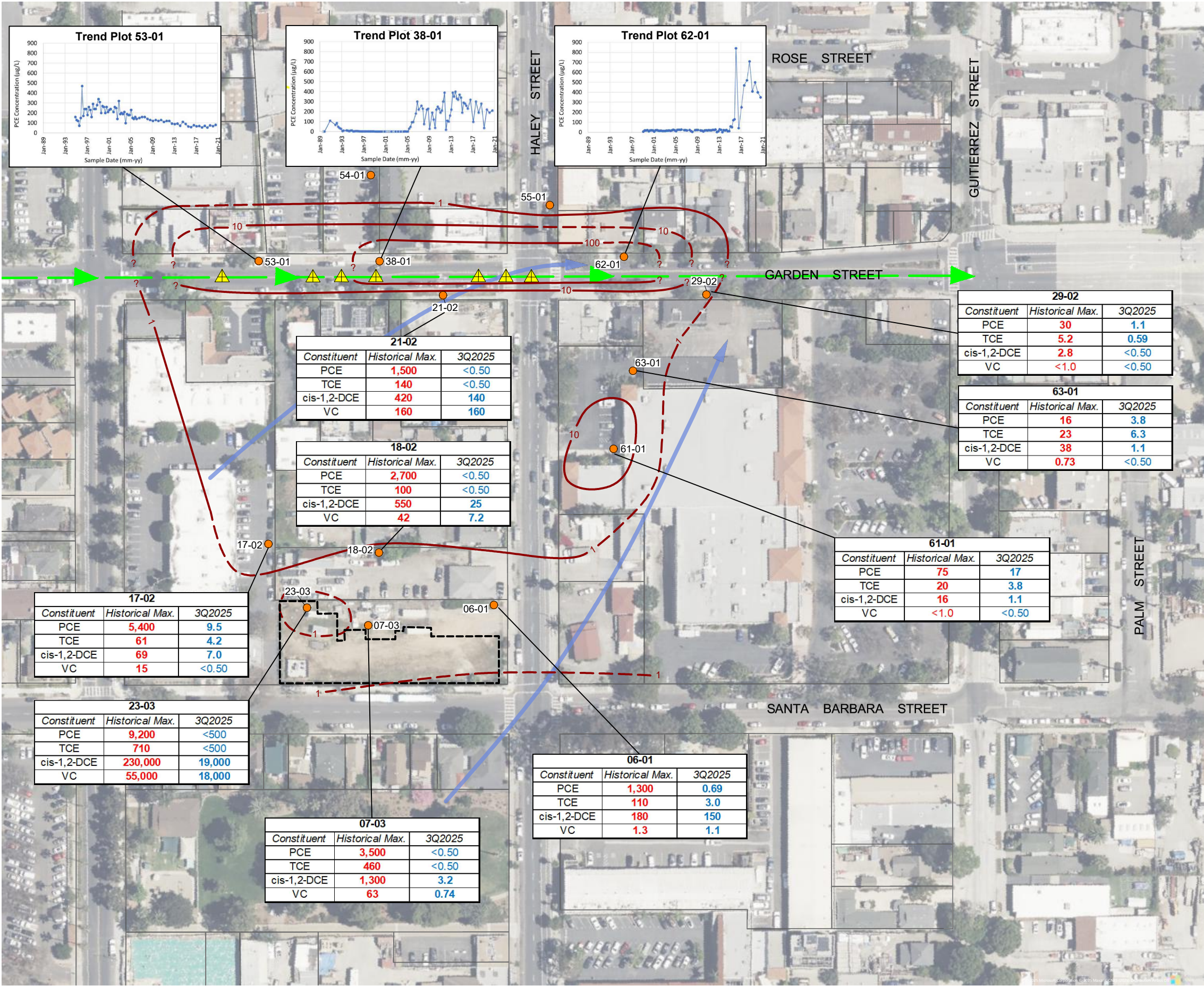


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Truckee, CA 96161



**FIGURE
17**

I:\Client\Mission Linen\93-25011167 Santa Barbara\18-23 Shallow Zone Results.dwg Modified 1/13/2026 by JPoore



LEGEND

- Former Ambassador Building Outline (201 East Haley Street)
- Damaged Sewer Line/Utility Corridor Preferential Pathway
- Damaged Section of Sewer Line
- 61-01 Shallow Zone 1 Monitoring Well Location
- Line of Equal Interpreted PCE Concentration in Shallow Zone 1 (µg/L) - Dashed Where Inferred
- Approximate Direction of Horizontal Groundwater Flow

61-01		2025 Detected Concentration in µg/L (Bold Indicates a Result Above Laboratory Reporting Limit)
Constituent	Historical Max.	
PCE	75	
TCE	20	
cis-1,2-DCE	16	
VC	<1.0	

61-01		Historical Maximum Concentration in µg/L (Bold Indicates a Result Above Laboratory Reporting Limit)
Constituent	Historical Max.	
PCE	75	
TCE	20	
cis-1,2-DCE	16	
VC	<1.0	

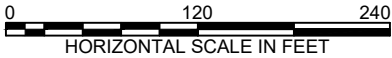
NOTES:
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
VC = Vinyl Chloride
µg/L = Micrograms per Liter
VOC = Volatile Organic Compound

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

SITE PLAN WITH CURRENT AND HISTORICAL MAXIMUM VOC DETECTIONS - SHALLOW ZONE 1

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

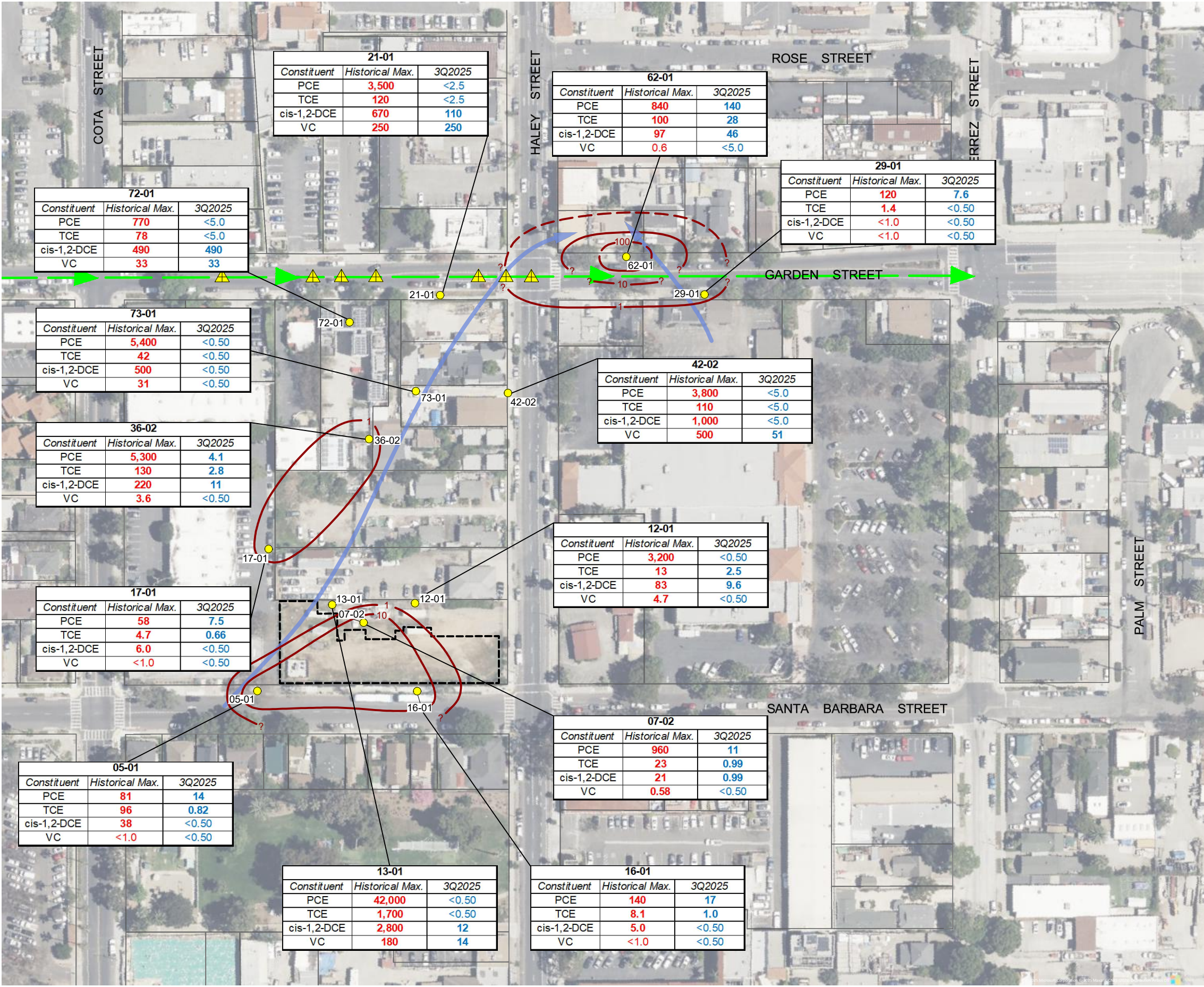
PROJECT NO.	DATE	DRAWN BY:	APP. BY:
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FIGURE 18



LEGEND

- Former Ambassador Building Outline (201 East Haley Street)
- Damaged Sewer Line/Utility Corridor Preferential Pathway
- Damaged Section of Sewer Line
- 72-01 Shallow Zone 2 Monitoring Well Location
- Line of Equal Interpreted PCE Concentration in Shallow Zone 2 (µg/L) - Dashed Where Inferred
- Approximate Direction of Horizontal Groundwater Flow

72-01			2025 Detected Concentration in µg/L (Bold Indicates a Result Above Laboratory Reporting Limit)
Constituent	Historical Max.	3Q2025	
PCE	770	<5.0	
TCE	78	<5.0	
cis-1,2-DCE	490	490	
VC	33	33	
Historical Maximum Concentration in µg/L (Bold Indicates a Result Above Laboratory Reporting Limit)			

NOTES:
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
VC = Vinyl Chloride
µg/L = Micrograms per Liter
VOC = Volatile Organic Compound

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

SITE PLAN WITH CURRENT AND HISTORICAL MAXIMUM VOC DETECTIONS - SHALLOW ZONE 2

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	JANUARY 2026	JP	EH

0 120 240
HORIZONTAL SCALE IN FEET

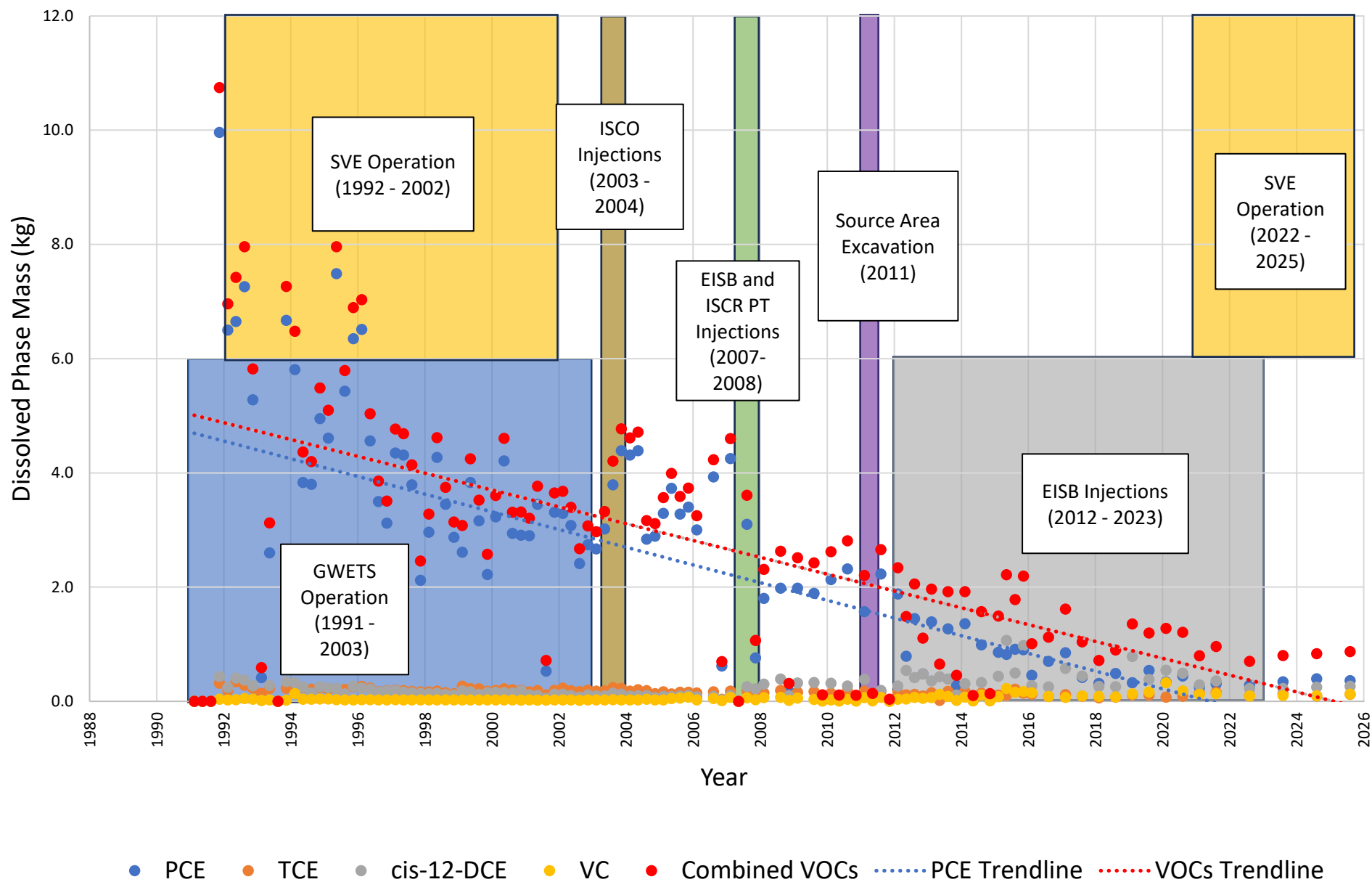


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Truckee, CA 96161



FIGURE
19

Figure 21 - Estimated Dissolved Mass (kg) versus Time
SZ1, SZ2, and SZ3





LEGEND

Former Ambassador Building Outline (201 East Haley Street)

15-03 Shallow Zone 4 Monitoring Well Location

10 Line of Equal Interpreted PCE Concentration in Shallow Zone 4 (µg/L) - Dashed Where Inferred

Approximate Direction of Horizontal Groundwater Flow

Constituent Sampled

Well ID

15-03		
Constituent	Historical Max.	3Q2025
PCE	47	28
TCE	3.2	<0.50
cis-1,2-DCE	<1.0	<0.50
VC	<1.0	<0.50

2025 Detected Concentration in µg/L (**Bold** Indicates a Result Above Laboratory Reporting Limit)

Historical Maximum Concentration in µg/L (**Bold** Indicates a Result Above Laboratory Reporting Limit)

NOTES:
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
VC = Vinyl Chloride
µg/L = Micrograms per Liter

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

SITE PLAN WITH CURRENT AND HISTORICAL MAXIMUM VOC DETECTIONS - SHALLOW ZONE 4

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	DECEMBER 2025	JP	EH

0 120 240
HORIZONTAL SCALE IN FEET



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Truckee, CA 96161



FIGURE 22



LEGEND

Former Ambassador Building Outline
(201 East Haley Street)

52-03 ● Shallow Zone 5 Monitoring Well Location

Constituent
Sampled

Well ID

Constituent	Historical Max.	3Q2025
PCE	7.8	3.9
TCE	2	<0.50
cis-1,2-DCE	<1.0	<0.50
VC	<1.0	<0.50

2025 Detected
Concentration in µg/L
(**Bold** Indicates a Result
Above Laboratory
Reporting Limit)

Historical Maximum
Concentration in µg/L
(**Bold** Indicates a Result Above
Laboratory Reporting Limit)

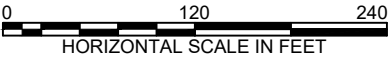
NOTES:
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
VC = Vinyl Chloride
µg/L = Micrograms per Liter

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

**SITE PLAN WITH CURRENT AND
HISTORICAL MAXIMUM VOC
DETECTIONS - SHALLOW ZONE 5**

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	DECEMBER 2025	JP	EH



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**FIGURE
23**

I:\Client\Mission Linen\93-25011167 Santa Barbara\18-23 Shallow Zone Results.dwg Modified 1/9/2026 by JPoore



LEGEND

Former Ambassador Building Outline
(201 East Haley Street)

11-01 Upper Producing Zone Monitoring Well Location

Constituent
Sampled

Well ID

Constituent	11-01	
	Historical Max.	3Q2023
PCE	100	<0.50
TCE	2.8	<0.50
cis-1,2-DCE	1.1	<0.50
VC	<1.0	<0.50

2025 Detected
Concentration in µg/L
(**Bold** Indicates a Result
Above Laboratory
Reporting Limit)

Historical Maximum
Concentration in µg/L
(**Bold** Indicates a Result Above
Laboratory Reporting Limit)

NOTES:

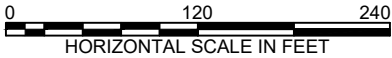
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
VC = Vinyl Chloride
µg/L = Micrograms per Liter

BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

SITE PLAN WITH CURRENT AND
HISTORICAL MAXIMUM VOC DETECTIONS
- UPPER PRODUCING ZONE

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	DECEMBER 2025	JP	EH



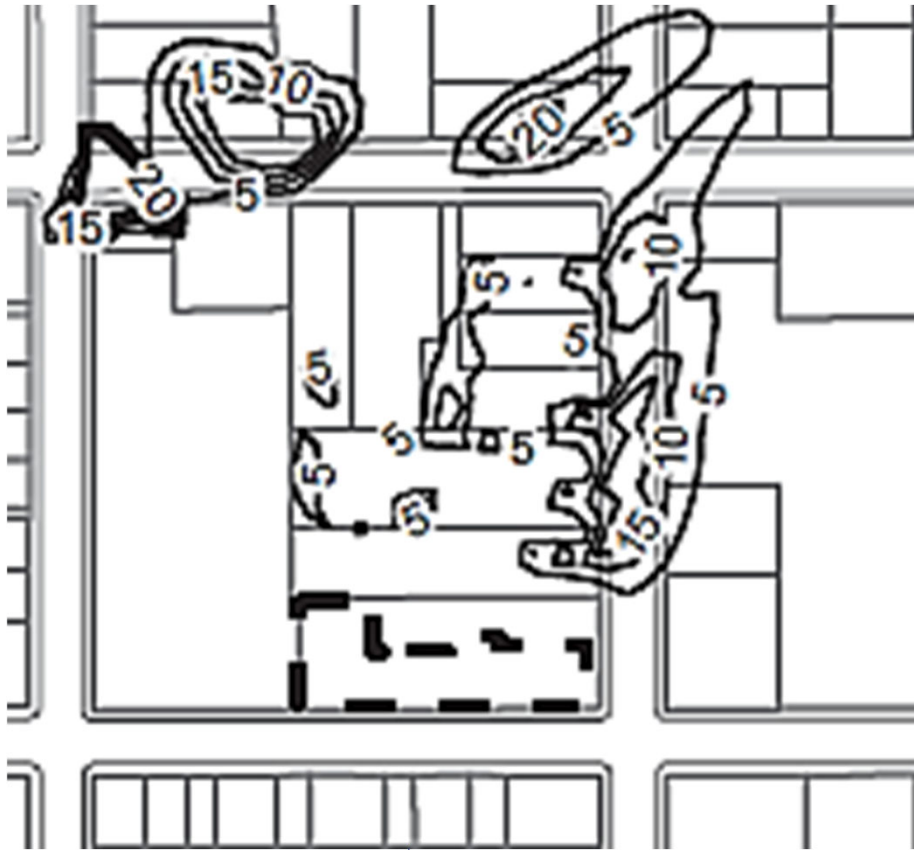
10775 Pioneer Trail, Suite 210
Truckee, CA 96161



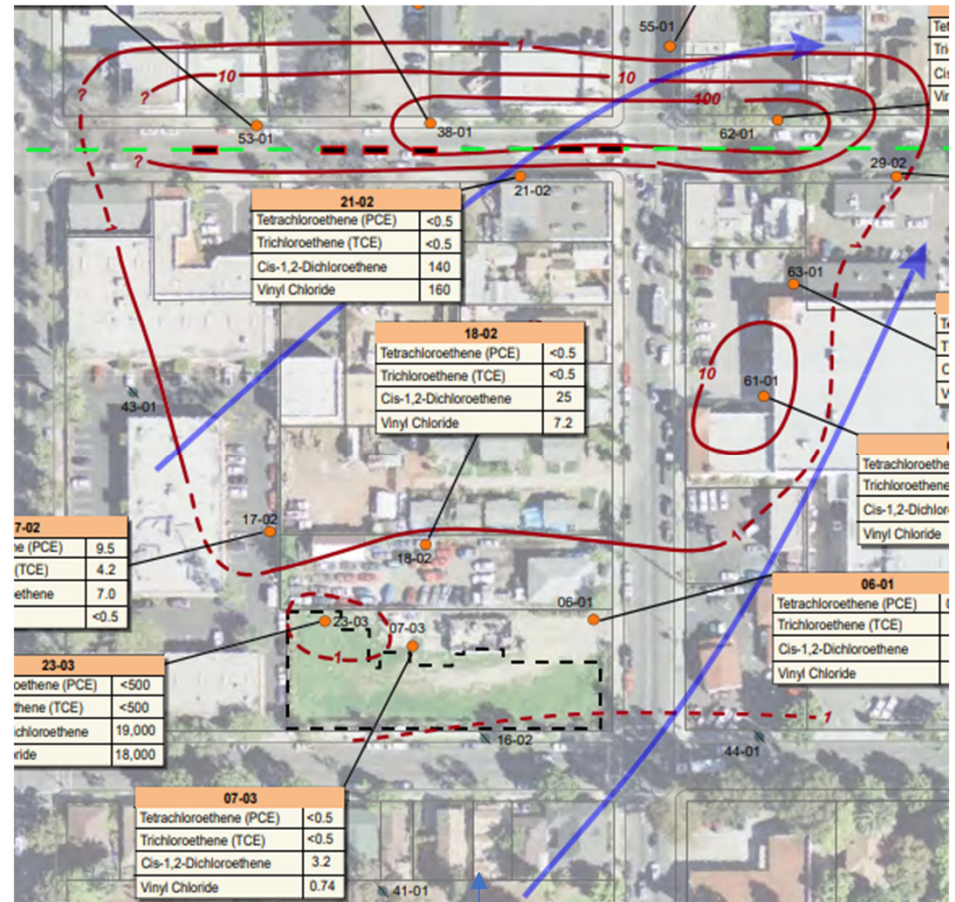
FIGURE
24

Figure 25

Comparison of 2010 CAP Groundwater Model To Current Conditions



Predicted PCE Plume - 2030



Actual PCE Plume - 2025

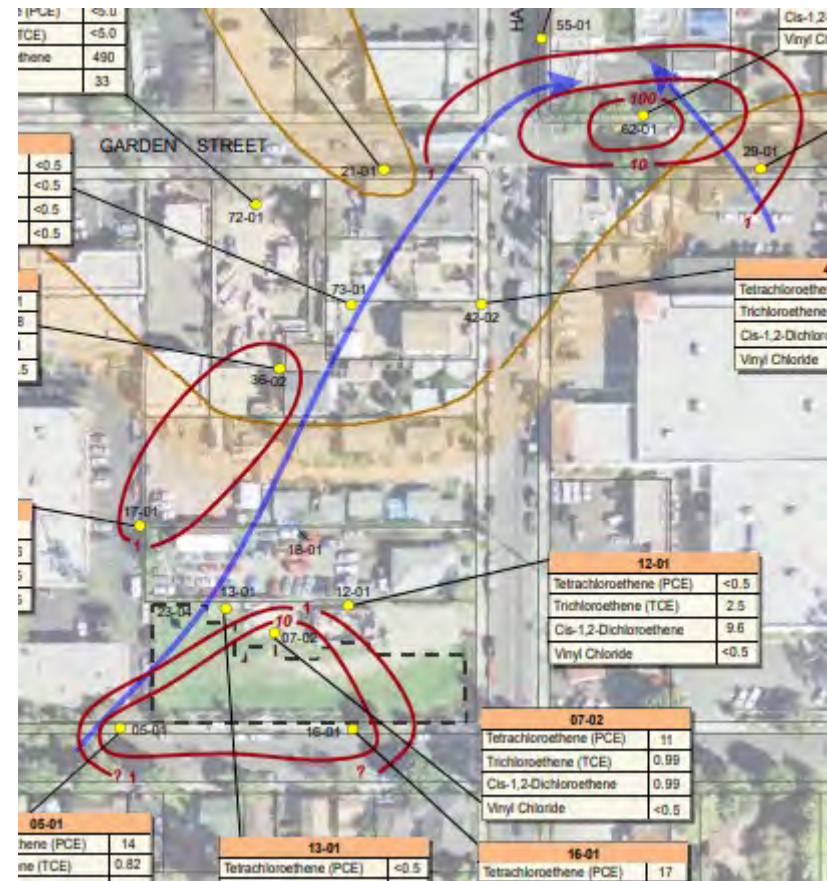
Predicted SZ1 PCE Plume in 2030 after EISB Treatment and MNA vs Actual SZ1 PCE Plume in 2025 after EISB and MNA Treatment

Figure 26

Comparison of 2010 CAP Groundwater Model To Current Conditions



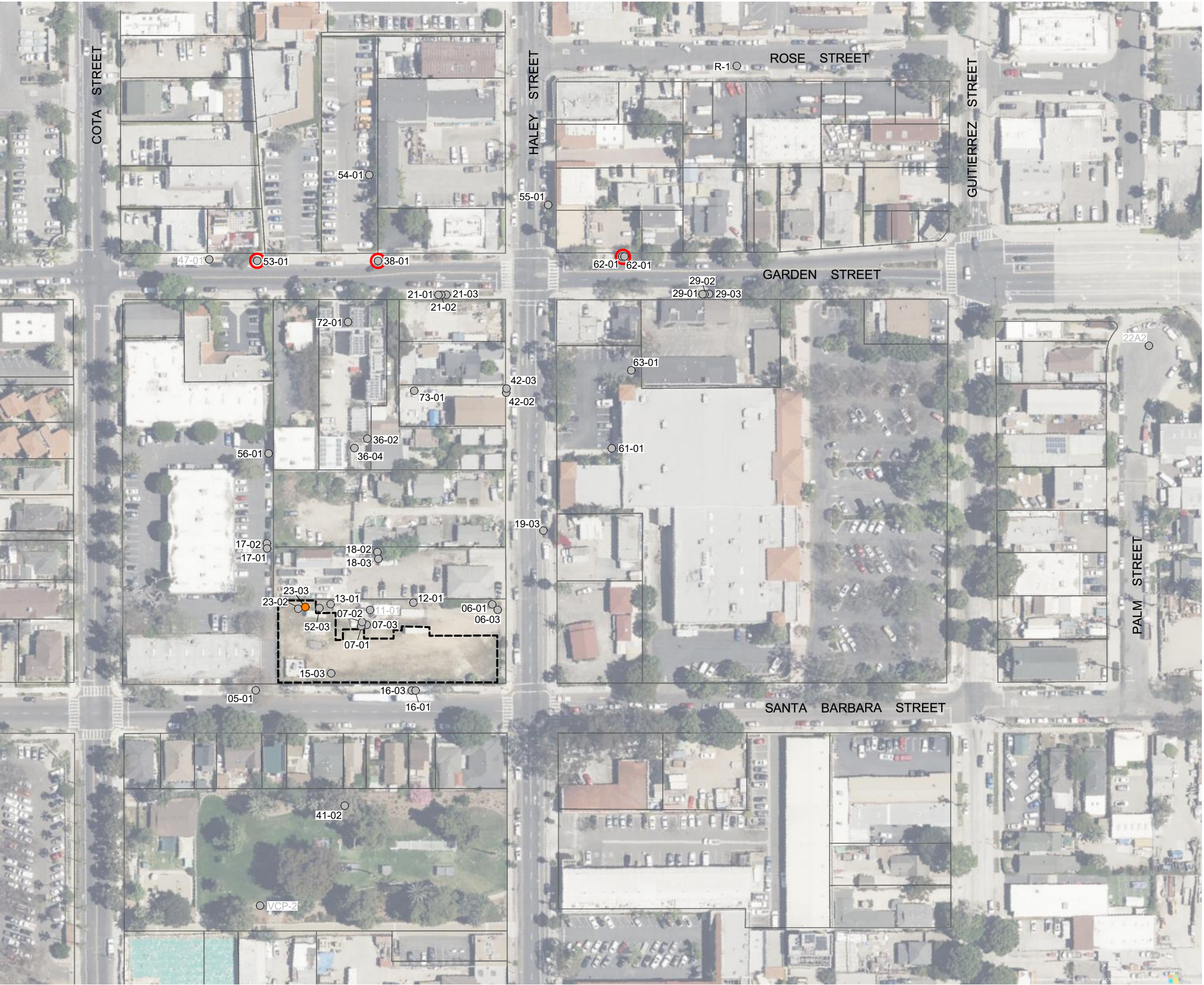
Predicted PCE Plume - 2030



Actual PCE Plume - 2025

Predicted SZ2 PCE Plume in 2030 after EISB Treatment and MNA vs Actual SZ2 PCE Plume in 2025 after EISB and MNA Treatment

I:\Client\Mission Linen\93-25011167 Santa Barbara\02_05_27 Site Plan, POE Impacts.dwg Modified 1/12/2026 by JPoore



LEGEND

Former Ambassador Building Outline
(201 East Haley Street)

23-03 Shallow Zone 1 Monitoring Well Location

Monitoring Well Location Proposed for Destruction

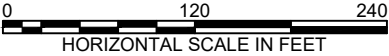
Monitoring Well Location Proposed for
Transfer to Appropriate Responsible Party
by RWQCB or Destruction

NOTES:
RWQCB = Regional Water Quality Control Board
BASE MAP SOURCE:
URS Semi-Annual Report, April 20, 2010

**GROUNDWATER MONITORING WELL
LOCATIONS PROPOSED FOR
DESTRUCTION OR TRANSFER**

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	JANUARY 2026	JP	EH

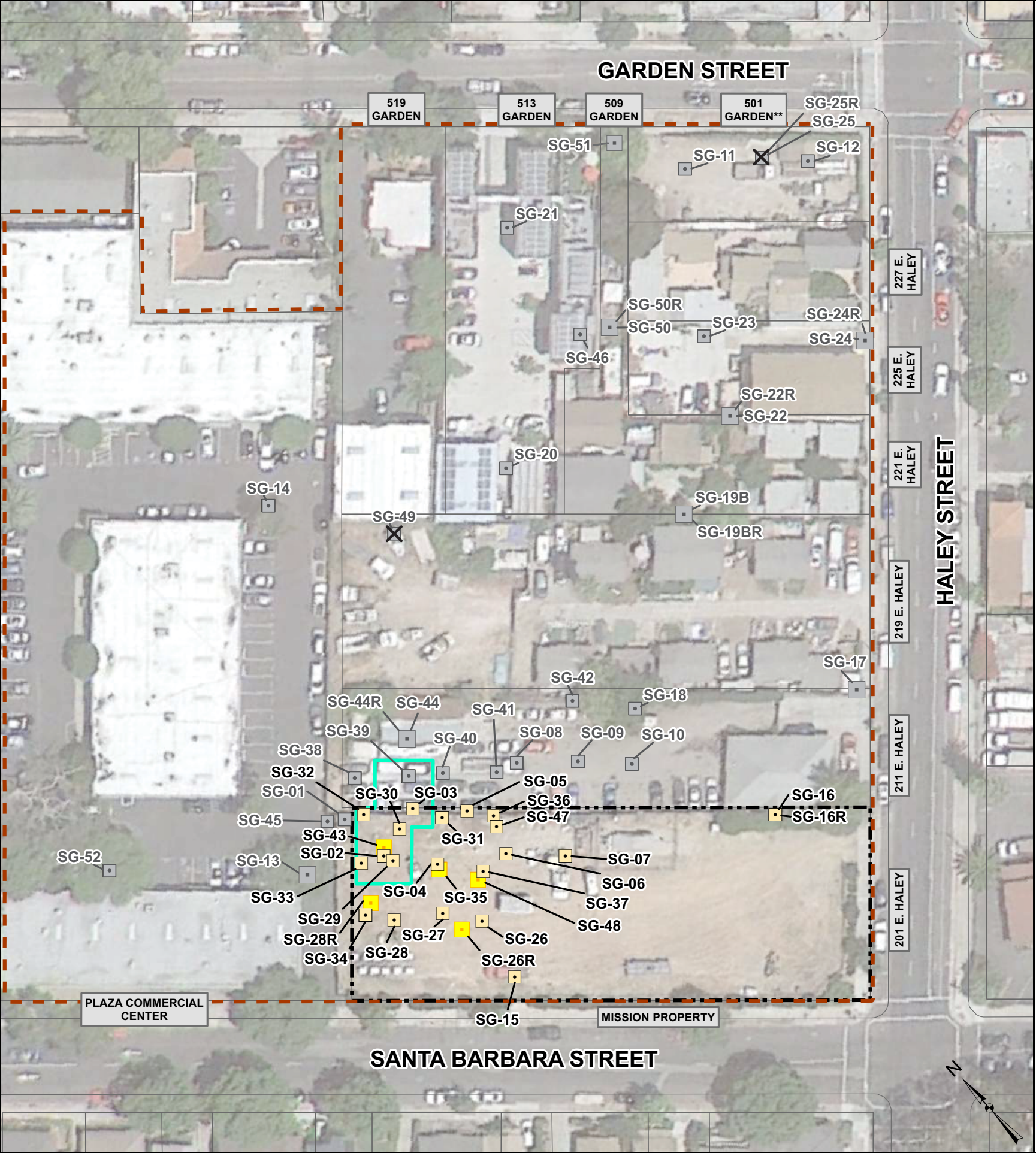


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**FIGURE
27**

I:\Client\Mission Linen\93-25011167 Santa Barbara\Figure 28 - Sampling Locations Proposed for Destruction.dwg



Legend

- Summer 2024 Soil Gas Sampling Location
- Historic Soil Gas Sampling Location
- Destroyed Soil Gas Sampling Location
- Summer 2024 Soil Gas Sampling Location Proposed for Destruction
- Historic Soil Gas Sampling Location Proposed for Destruction
- Excavation Area Limits
- Mission Property (201 East Haley Street)
- Site Boundary

NOTES:

** Previously 235 E. Haley Street

**SOIL GAS SAMPLING LOCATIONS
PROPOSED FOR DESTRUCTION**

MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
93-25011167	JANUARY 2026	Geosyntec	EH

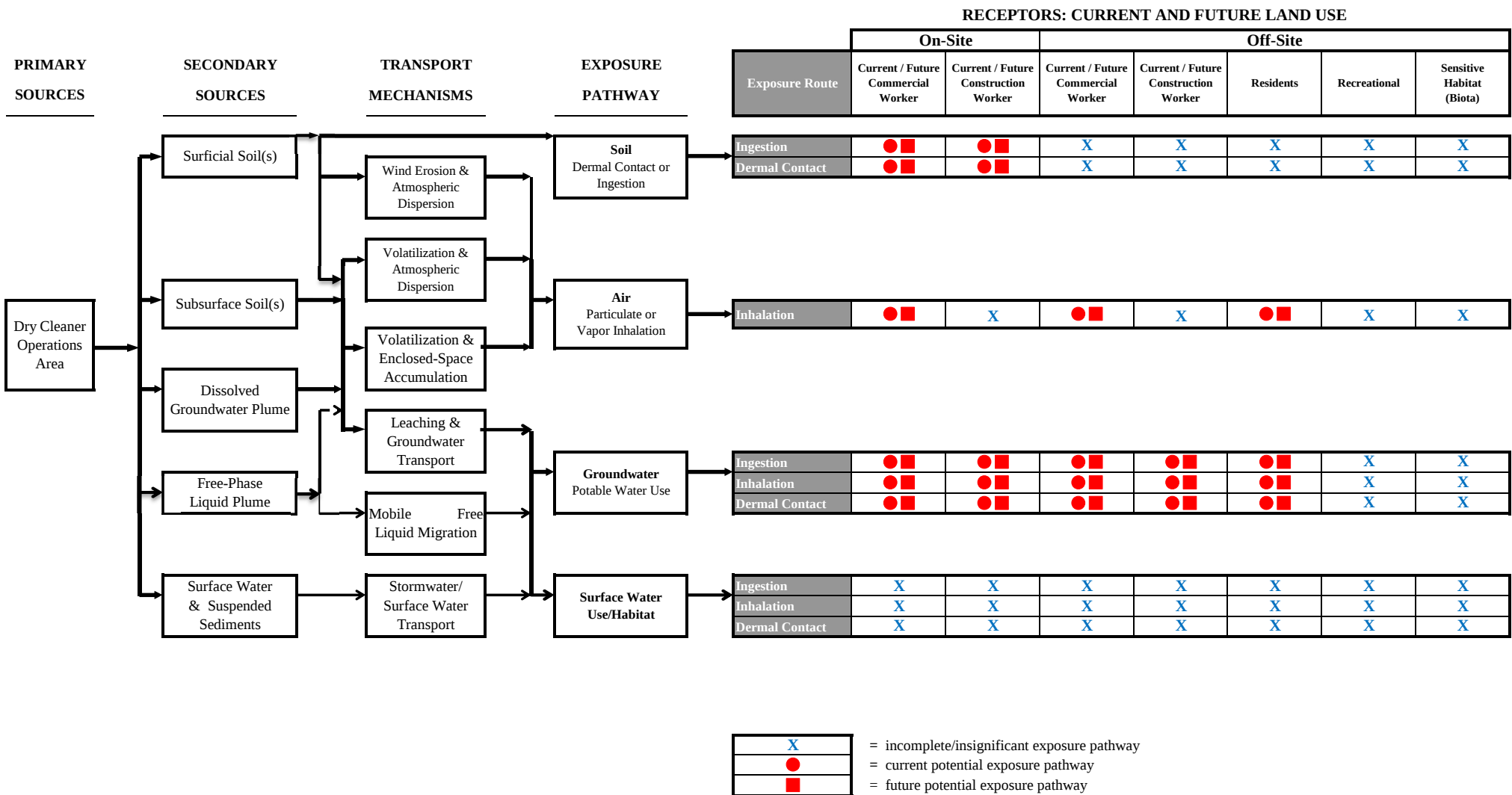
0 60 120

APPROXIMATE SCALE IN FEET

APEX
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Truckee, CA 96161

**FIGURE
28**

TABLES



10775 Pioneer Trail Suite 210
Truckee, CA 96161

TABLE 1
SITE CONCEPTUAL MODEL FOR HUMAN EXPOSURE PRIOR TO
REMEDATION AND MITIGATION

Former Mission Ambassador Laundry, Santa Barbara, California

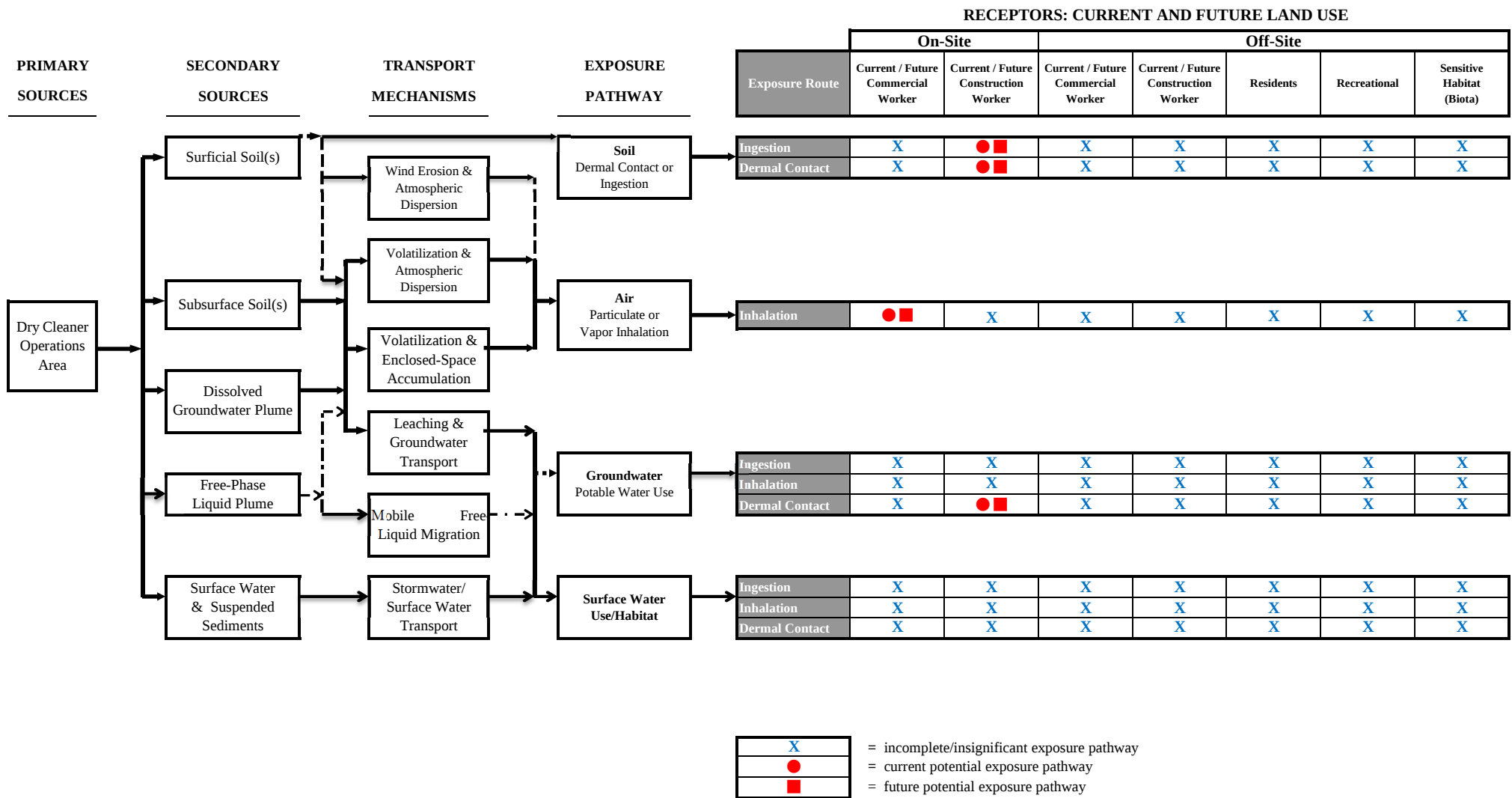


Table 2
SITE CONCEPTUAL MODEL FOR HUMAN EXPOSURE AFTER
REMEDATION & MITIGATION COMPLETE

Table 3 MAROS Statistical Summary

Hydrostratigraphic Zone	Statistical Category	MAROS Statistical Summary by Chemical			
		PCE	TCE	cis-1,2-DCE	Vinyl Chloride
Shallow Zone 1 (SZ1) 11 Wells Total					
Monitoring Wells: 06-01, 07-03, 17-02, 18-02, 21-02, 23-03, 29-02, 54-01, 55-01, 61-01, 63-01	Wells non-detect for constituent	3 (23-03, 54-01, 55-01)	--	1 (54-01)	4 (29-02, 54-01, 55-01, and 61-01)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	2 (07-03, 21-02)	7 (07-03, 18-02, 21-02, 54-01, 55-01, 61-01, 63-01)	5 (17-02, 21-02, 29-02, 61-01, 63-01)	2 (17-02, 63-01)
	Wells showing ' No Trend ' in both statistical tests	2 (06-01, 18-02)	1 (23-03)	1 (23-03)	1 (23-03)
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	4 (17-02, 29-02, 61-01, 63-01) Note: All PCE detections have ranged between ND to 35 µg/L since 2009	3 (06-01, 17-02, 29-02) Note: TCE detections for each of the 3 monitoring wells listed have been at or below the MCL since 2016	4 (06-01, 07-03, 18-02, 55-01) Note: Concentrations have ranged between ND to 150 µg/L	4 (06-01, 07-03, 18-02, 21-02) Note: VC concentrations are 1.1 µg/L (06-1), 0.74 µg/L (07-03), 7.2 µg/L (18-02), and 160 µg/L (21-02)
Shallow Zone 2 (SZ2) 13 Wells Total					
Monitoring Wells: 05-01, 07-02, 12-01, 13-01, 16-01, 17-01, 21-01, 29-01, 36-02, 42-02, 55-01, 72-01, 73-01	Wells non-detect for constituent	2 (55-01, 73-01)	--	3 (05-01, 16-01, 29-01)	5 (05-01, 16-01, 17-01, 29-01, 55-01)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	5 (12-01, 13-01, 21-01, 36-02, 72-01)	7 (13-01, 16-01, 17-01, 29-01, 36-02, 55-01, 72-01)	7 (07-02, 13-01, 17-01, 21-01, 42-02, 72-01, 73-01)	5 (07-02, 12-01, 13-01, 36-02, 42-02)
	Wells showing ' No Trend ' in both statistical tests	--	3 (05-01, 21-01, 73-01)	1 (36-02)	1 (73-01)
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	6 (05-01, 07-02, 16-01, 17-01, 29-01, 42-02) Note: PCE concentrations are 14 µg/L (05-01), 11 µg/L (07-02), 17 µg/L (16-01), 7.5 µg/L (17-01), 7.6 µg/L (29-01), and ND (42-02)	3 (07-02, 12-01, 42-02) Note: TCE concentrations are below the MCL, concentrations are 0.99 µg/L (07-02), 2.5 µg/L (12-01), and ND (42-02)	2 (12-01, 55-01) Note: cis-1,2-DCE detections in wells 12-01 and 36-02 range from 1.5 to 9.6 ug/L. Detections in well 55-01 have been below the MCL or non-detect since 1994	2 (21-02, 72-01) Note: VC concentrations are 250 µg/L (21-02), and 33 µg/L (72-01)
Shallow Zone 3 (SZ3) 10 Wells Total					
Monitoring Wells: 07-01, 16-03, 18-03, 19-03, 21-03, 23-02, 29-03, 41-02, 42-03, 56-01	Wells non-detect for constituent	--	2 (29-03, 42-03)	4 (16-03, 19-03, 29-03, 41-02)	7 (16-03, 19-03, 21-03, 29-03, 41-02, 42-03, 56-01)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	2 (18-03, 56-01)	3 (16-03, 18-03, 19-03)	1 (42-03)	1 (07-01)
	Wells showing ' No Trend ' in both statistical tests	2 (07-01, 16-03)	1 (07-01)	3 (07-01, 18-03, 23-02)	1 (23-02)
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	6 (19-03, 21-03, 23-02, 29-03, 41-02, 42-03) Note: PCE concentrations are 19 µg/L (19-03), 99 µg/L (21-03), 51 µg/L (23-02), 3.2 µg/L (29-03), 14 µg/L (41-02), and 42 µg/L (42-03)	4 (21-03, 23-02, 41-02, 56-01) Note: TCE concentrations detected at the four monitoring wells is below the MCL, ranging from ND to 3.0 µg/L	2 (21-03, 56-01) Note: cis-1,2-DCE concentrations are ND at 21-03 and 5.6 µg/L at 56-01	1 (18-03) Note: VC concentrations are 4.6 µg/L

Shallow Zone 4 (SZ4) 3 Wells Total					
Monitoring Wells: 06-03, 15-03, 36-04	Wells non-detect for constituent	--	2 (15-03, 36-04)	3 (06-03, 15-03, 36-04)	3 (06-03, 15-03, 36-04)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	--	1 (06-03)	--	--
	Wells showing ' No Trend ' in both statistical tests	1 (36-04)	--	--	--
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	2 (06-03, 15-03) Note: PCE detections currently range between 18 to 28 µg/L	--	--	--
Upper Production Zone (UPZ) 4 Wells Total					
Monitoring Wells: 11-01, 22A2, 47-01, VCP-2	Wells non-detect for constituent	2 (11-01, 22A2)	4 (11-01, 22A2, 47-01, VCP-2)	4 (11-01, 22A2, 47-01, VCP-2)	4 (11-01, 22A2, 47-01, VCP-2)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	--	--	--	--
	Wells showing ' No Trend ' in both statistical tests	1 (VCP-2)	--	--	--
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	1 (47-01) Note: all detections have been lower than MCL or non-detect since 2005)	--	--	--

Notes:
MAROS = Monitoring and Remediation Optimization System
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
MCL = Maximum Contaminant Level
µg/L = microgram per lieter
ND = Not detected above laboratory reporting limit
-- Not applicable

APPENDIX A

**OFF-SITE TETRACHLOROETHENE (PCE) IMPACTS IN THE VICINITY OF THE FORMER
AMBASSADOR LAUNDRY FACILITY, 201 EAST HALEY STREET, SANTA BARBARA, CA,
PREPARED BY ENVIRONMENTAL RISK SOLUTIONS, INC. DATED MAY 3, 2013**

May 3, 2013

Kristina Seley, PE
Central Coast Regional Water Quality Control Board
895 Aerovista, Suite 101
San Luis Obispo, CA 93401
kristina.seley@waterboards.ca.gov

**OFF-SITE TETRACHLOROETHENE (PCE) IMPACTS IN THE VICINITY OF THE FORMER
AMBASSADOR LAUNDRY FACILITY, 201 EAST HALEY STREET, SANTA BARBARA, CA**

Dear Ms. Seley:

On behalf of Mission Linen Supply (Mission), Environmental Risk Solutions, Inc. (ERS) has prepared this summary of off-site properties with known tetrachloroethene (PCE) contamination located in an up- or cross-gradient groundwater flow direction relative to the former Ambassador Laundry facility (the Site). Information included in this letter was obtained from the California Regional Water Quality Control Board (RWQCB) Geotracker database and hard copy files reviewed at the Central Coast RWQCB office in April 2012. The purpose of this summary is to evaluate (1) PCE impacts at nearby properties relative to the Background Evaluation included as Section 5.5 of the URS Corrective Action Plan dated August 2010; and, (2) criteria used by the RWQCB and other agencies for issuing closure to other PCE and petroleum hydrocarbon impacted properties in the vicinity of the Site. The attached Figure 1 displays six confirmed PCE impacted properties within 600 feet of the Site that are described below.

631 Garden Street is located ~550 feet up- to cross-gradient of the Site. This property is the former City recycling center which included vehicle maintenance activities and is being considered for redevelopment. It is under the oversight of the Santa Barbara County Fire Department (SBCFD) and is an open site under the leaking underground storage tank (LUST) program. Groundwater monitoring data from 2012 showed low concentrations of PCE in five monitoring wells with a maximum concentration of 2.9 parts per billion (ppb). Soil gas data collected in 2010 indicated elevated levels of PCE and TCE with a maximum PCE soil gas concentration of 8,200 ppb suggesting a possible residual unidentified source area. Site-specific groundwater flow appears variable with opposite flow directions.

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608300251

636 Santa Barbara Street is located ~600 feet up-gradient of the Site. This property is a former retail gas station and Santa Barbara Locksmiths and is currently unoccupied that was issued closure by the SBCFD in March 2012 under the LUST program following a remedial excavation, confirmatory soil sampling and groundwater monitoring. Groundwater data collected from 2006 through 2010 had PCE detections in the nine monitoring wells with a maximum concentration of 14 ppb in 2009. The PCE does not appear to be specifically-related to the former retail petroleum fueling activities based on the impacts across the entire property; however, the locksmith may have used solvents as part of their operations. Site-specific groundwater flow direction is generally consistent to the east.

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608330380

526 Anacapa Street is located ~400 feet up-gradient of the Site. This property is a former retail gas station and listed as Sanchez Property in the RWQCB Geotracker database that was issued closure by the SBCFD in October 2010 under the LUST program. Five monitoring wells located on the property all consistently contained PCE with a maximum concentration of 21 ppb that was reported in the final September 2009 monitoring event. The PCE does not appear to be specifically-related to the former retail petroleum fueling activities based on the impacts across the entire property. Site-specific groundwater flow direction is generally consistent towards the east-southeast.

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608340674

104 East Haley Street is located ~400 feet up- to cross-gradient of the Site. This property is listed as Tidewater Marine Facility in the RWQCB Geotracker database and was issued a no further action (NFA) letter by the RWQCB dated November 14, 1996. A soil and groundwater investigation report was prepared by Entrix; however, this report was not available on Geotracker or in the RWQCB hard copy file. The NFA letter indicates that PCE concentrations ranged from 24 ppb to 510 ppb (presumably in groundwater). The RWQCB letter attributed these impacts to a regional groundwater plume likely based on data and conclusions in the Entrix report, including a decrease in PCE concentrations in soil in an upward direction. No site-specific groundwater flow direction is available.

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SL0608341270

221 East Gutierrez Street is located ~300 feet cross-gradient of the Site. This property is the former GTE main yard that included vehicle fueling and maintenance activities prior to redevelopment with the current Smart & Final and Office Max businesses. Based on a previous file review performed by URS (URS, 2000), GTE's consultant documented the use of large quantities of solvents at this facility over a number of years. The Geotracker database shows that it was closed under RWQCB oversight in May 2001. A number of

technical documents reviewed during the hard copy file review were recently uploaded to Geotracker including monitoring reports by ARCADIS from 1999 and 2000 that indicate maximum PCE concentrations ranging from 49 ppb to 71 ppb just before closure by the RWQCB.

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000004138

401 Santa Barbara Street is located ~300 feet cross-gradient of the Site. This property is listed as Richards Accurate Import Service in the RWQCB Geotracker database which shows that it was closed under the SBCFD LUST program in June 1990. Investigation reports related to the 221 East Gutierrez Street property from 1999 show a PCE plume extending from this property with PCE concentrations ranging from 43 ppb to 79 ppb based on hydropunch and monitoring well data adjacent to and directly down-gradient of the property. It does not appear that this property has ever been investigated as a potential source of PCE in response to this data.

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608300541

Summary

Based on review of the data and available reports it is not clear if the PCE impacts at these properties are related to on-site sources or associated with a regional PCE plume from other up-gradient sources. It is likely a combination of these factors.

- The 631 Garden Street property raises a number of questions, including elevated PCE soil vapor impacts with little shallow groundwater impacts and the variable groundwater flow directions which are inconsistent with local flow patterns. Based on the shallow PCE impacts to soil and the former vehicle maintenance activities, an unidentified on-site solvent source appears likely in addition to the ongoing petroleum hydrocarbon-related LUST issues.
- The 636 Santa Barbara and 526 Anacapa Street properties are both closed LUST sites that had respective maximum PCE concentrations of 14 ppb and 21 ppb in groundwater at closure, with PCE detections in all site monitoring wells. The generally low but pervasive PCE impact appears consistent with a regional up-gradient PCE plume; however, an on-site source is possible at either location.
- The regional PCE plume theory appears to be the basis for the RWQCB issuing an NFA letter for the 104 East Haley Street property that apparently had 510 ppb of PCE in shallow groundwater when the NFA was issued. Within the Ambassador monitoring well network, the maximum PCE concentration in Shallow Zone 1 based on the February 2013 sampling event is 700 ppb.

- It appears that one or both of the 221 East Gutierrez and 401 Santa Barbara Street properties is a source of PCE. The investigation work conducted for the East Gutierrez property suggest that the Santa Barbara Street property is the source, but the prior maintenance activities by GTE that included solvent use, and the elevated on-site impacts also indicate the East Gutierrez property is a likely source. Regardless of the specific source, these sites were, and remain closed by the RWQCB and SBCFD with PCE concentrations in groundwater in the range of 40 ppb to 80 ppb.
- In addition to the properties highlighted above, there are two properties located down-gradient of the Site, in areas with the highest PCE impact within the Ambassador plume where prior operations included the use of PCE and other solvents including one with known PCE impact to soil.

Mission and their consulting team would like to review this summary with the RWQCB and determine how this information relates to PCE background levels in the Site vicinity and RWQCB closure criteria.

Best Regards,



Donald W. Moore, PG, ARM
Principal

cc: Thea Tryon, RWQCB
Don Bock, Mission
Tony Mancuso, Mission
Matt Sutton, SGI
Bob Boudra, URS
Norm Colby, CGC

Attachment: Figure 1 – Off-site PCE Impacts near 201 East Haley Street

APPENDIX B

**VOLATILE ORGANIC COMPOUND IMPACTS BENEATH GARDEN STREET ALONG THE
HEAVILY DAMAGED CITY OF SANTA BARBARA SEWER MAIN AND UTILITY CORRIDOR,
SANTA BARBARA, CALIFORNIA, PREPARED BY ENVIRONMENTAL RISK SOLUTIONS,
INC. DATED DECEMBER 23, 2024**

December 23, 2024

Daniel Pelikan, PG, CHg
Engineering Geologist
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Daniel.Pelikan@waterboards.ca.gov

**VOLATILE ORGANIC COMPOUND IMPACTS BENEATH GARDEN STREET ALONG THE
HEAVILY DAMAGED CITY OF SANTA BARBARA SEWER MAIN AND UTILITY CORRIDOR,
SANTA BARBARA, CALIFORNIA**

Dear Mr. Pelikan:

On behalf of Mission Linen Supply (Mission), Environmental Risk Solutions, Inc. has prepared this summary letter to document our meeting on December 19th and Mission's positions regarding volatile organic compound (VOC) impacts along the Garden Street sewer and utility corridor including the slides that were presented.

Based on the positions outlined below, through multiple lines of evidence, it is clear to Mission and their consulting team that the responsible parties for current VOC impacts within and along the utility corridor beneath Garden Street are (1) the City of Santa Barbara (the City) and (2) numerous known and potential up-flow sewer dischargers.

1. Conceptual Site Model and Sewer Condition:

- a. The City sewer along the short segment of Garden between E. Cota and E. Haley Streets is heavily damaged at five locations based on the City's own records from 2018. These damages do not include the 2018 emergency sewer main repair at the Garden-E. Haley intersection that correlates with a spike and reduction in VOC impacts at well 62-01 after the repair. This well is immediately down-gradient, down-sewer flow of this intersection.
- b. The sewer main beneath Garden-E. Haley is below Shallow Zone 1 groundwater (~8-10 feet) as the 2018 repair observations reported a 12-foot depth. This groundwater-damaged sewer interaction creates a "washing machine effect" exacerbating conditions with both infiltration and exfiltration under different flow and pressure scenarios. Exfiltrated VOCs follow the sewer backfill preferential pathway to the southeast.

- c. The City's sewer in this area is a very old, heavily damaged transport mechanism, beneath shallow groundwater within porous backfill material with clear evidence of non-Mission tetrachloroethene (PCE) sources and numerous known and potential PCE sources in the area as highlighted below.
- d. The City has not responded to Apex inquiries regarding sewer repair status over the past year, so we assume they remain unrepaired.
- e. The Garden sewer in this area is understood to be a high-capacity collection segment and main artery to the wastewater treatment plant located south of Highway 101 traveling beneath the Garden underpass.
- f. A VOC spike also correlates with the 2022-2023 winter storm season with high, pulsing sewer flow conditions creating the washing machine effect.

2. Non-Mission PCE Sources:

- a. Non-Mission PCE Evidence 1: Clear indication of a PCE source, well outside of the groundwater flow path from the Mission source area, migrating along utility corridor since the mid-1990s in a down-sewer flow direction. This has been part of the conceptual site model for years as reflected by VOC plume maps from 2000 and 2009 clearly showing this separate source.
- b. Non-Mission PCE Evidence 2: The VOC concentration spikes in well 62-01 since 2015 have a different VOC signature with high PCE ratios and levels relative to the nearby remediated Mission impacts with no PCE as reflected by wells 21-02, 21-01 and 42-02 immediately upgradient of this area.
- c. Non-Mission PCE Evidence 3: In the immediate vicinity of Mission's 201 East Haley property, in up- and cross-gradient directions within a couple blocks, there are at least eight off-site properties and sources with recent or historic PCE levels in groundwater ranging from about 15 – 80 parts per billion including a number of sites closed by the RWQCB. There are properties with PCE soil impacts where groundwater has not been investigation. A recent Santa Barbara County RFQ identified six locations with PCE impacts about five blocks up-sewer flow direction from the Garden sewer main.

- 3. **Many Municipalities Are Liable:** Many municipalities in California have been assigned liability and contributed to sewer repair and remediation work in similar situations. Mission is directly involved in one of these situations and our legal counsel in that matter highlighted numerous cases where Cities have accepted an allocation by a litigated settlement. We understand the City was involved in a prior sewer-related settlement in 2011 with Channelkeeper that in part required them to repair portions of their sewer.

4. **RWQCB Response:** Since Mission's initial 2021 Technical Response requested by the RWQCB these positions have been further developed and strengthened with new information and decades of data and analysis through multiple lines of evidence. To date, the RWQCB has not provided a response disagreeing with any of Mission's positions in these annual technical responses.
5. **Sewer Repair and Cleanup:** A remedy for this area begins with the City repairing their sewers and accepting responsibility for cleanup. The City needs to address the up-flow dischargers who are or were their customers. State regulatory guidance points to municipal sewers acting as release and transport mechanisms that exacerbate conditions which is what is happening here.

Mission's position is that there is nothing more for Mission to do and that the utility corridor with the heavily damaged City sewers and related VOC impacts be designated a separate Site Cleanup Program case with the City and upgradient dischargers as responsible parties. It is questionable if any Mission-related impacts remain in the vicinity of well 62-01 based on (1) prior remedial efforts, (2) increasing non-Mission VOC impacts and (3) the high-flow preferential pathway conditions along the utility corridor. We look forward to the RWQCB working with the City to address their sewer problem in this area and implementing cleanup. Please direct them to our technical responses on this subject and share this letter. The Mission team will be available to address any questions related to our work product.

Best Regards,



Donald W. Moore, PG, ARM
Principal

cc: Greg Bishop, RWQCB
Tony Mancuso, Mission
Erik Harz, Apex
Dan Grasmick, Apex
Norm Colby, CGC

Attachment: Apex PPT Slides, RWQCB Meeting, December 19, 2024

Agenda

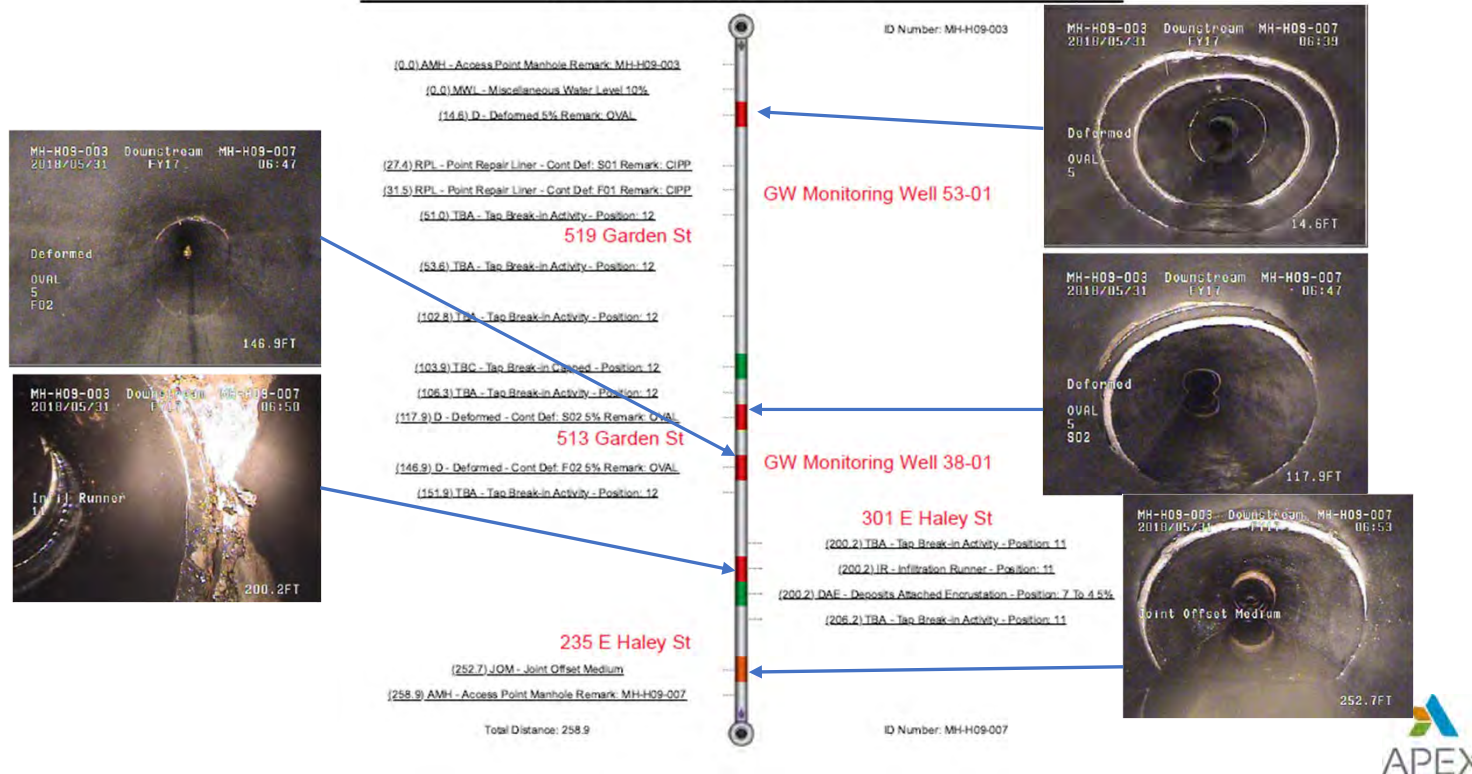
1. Introductions / Background
2. CSM / Sewer Conditions
3. Non-Mission PCE Sources
4. Many Municipalities Are Liable
5. CCRWQCB Response
6. Sewer Repair and Cleanup



City of Santa Barbara Sewer Inspection Reports

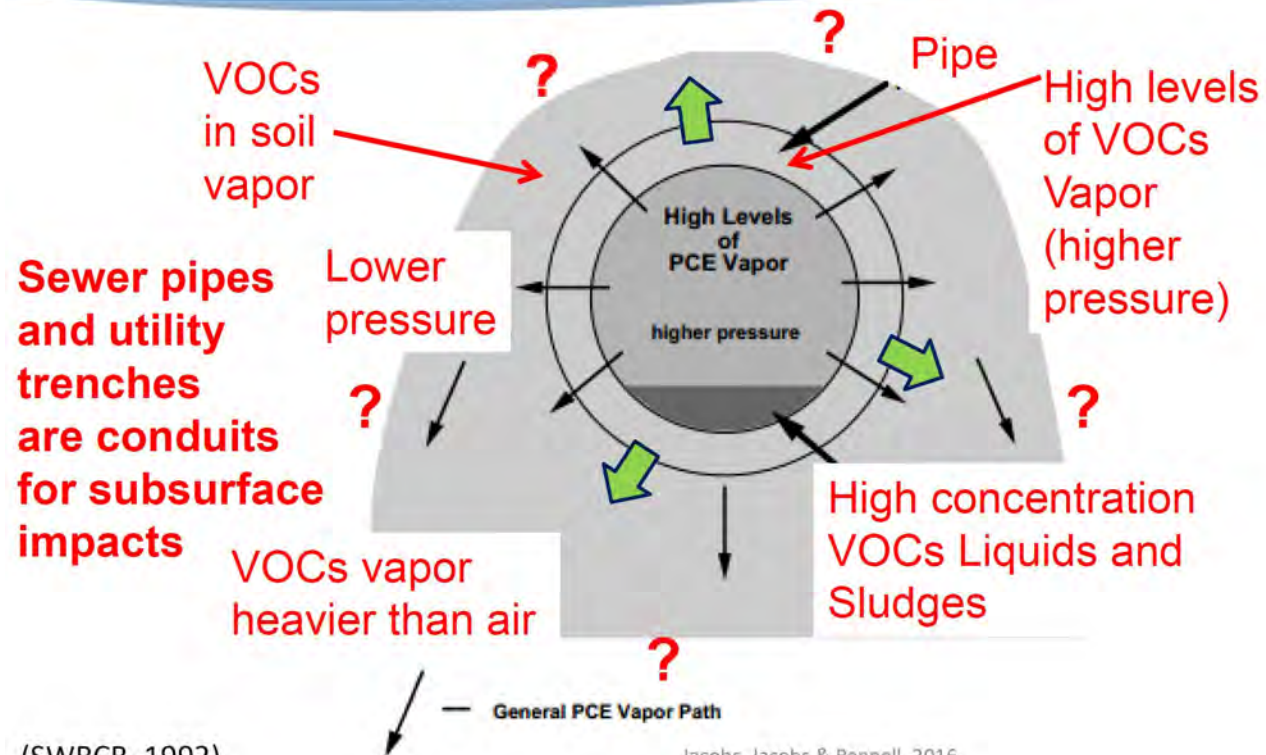


Date: 5/31/2018 6:36:00 AM	
Date: 5/31/2018 6:36:00 AM	Pipe Segment Reference: H9-50
Street: GARDEN ST.	Upstream MH: MH-H09-003
Surveyor Name: J ALEJOS	Downstream MH: MH-H09-007
Length Surveyed: 258.9	Direction of Survey: Downstream
Session ID: 11655	Material: Other
Pcp Quick Struct Rating:	Height (Diameter): 12



CSM

Pipe **exfiltration**: VOCs in liquid, soil, and gas; migrate in groundwater.



(SWRCB, 1992)

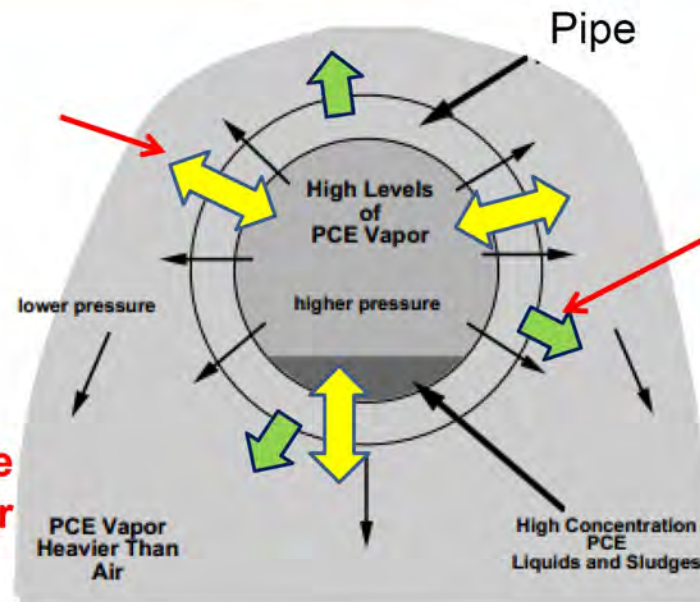
Jacobs, Jacobs & Pennell, 2016

CSM

Pipe **infiltration**: VOCs do enter transite/clay sewer pipe wall as a liquid or as a gas.

UPDATE:
VOCs Migrate
OUT OF
and INTO
Sewer Lines

**2) Exposure
may be outside
of groundwater
plume area.**



**LODI
MODEL:
VOCs
and
Liquids**

— General PCE Vapor Path

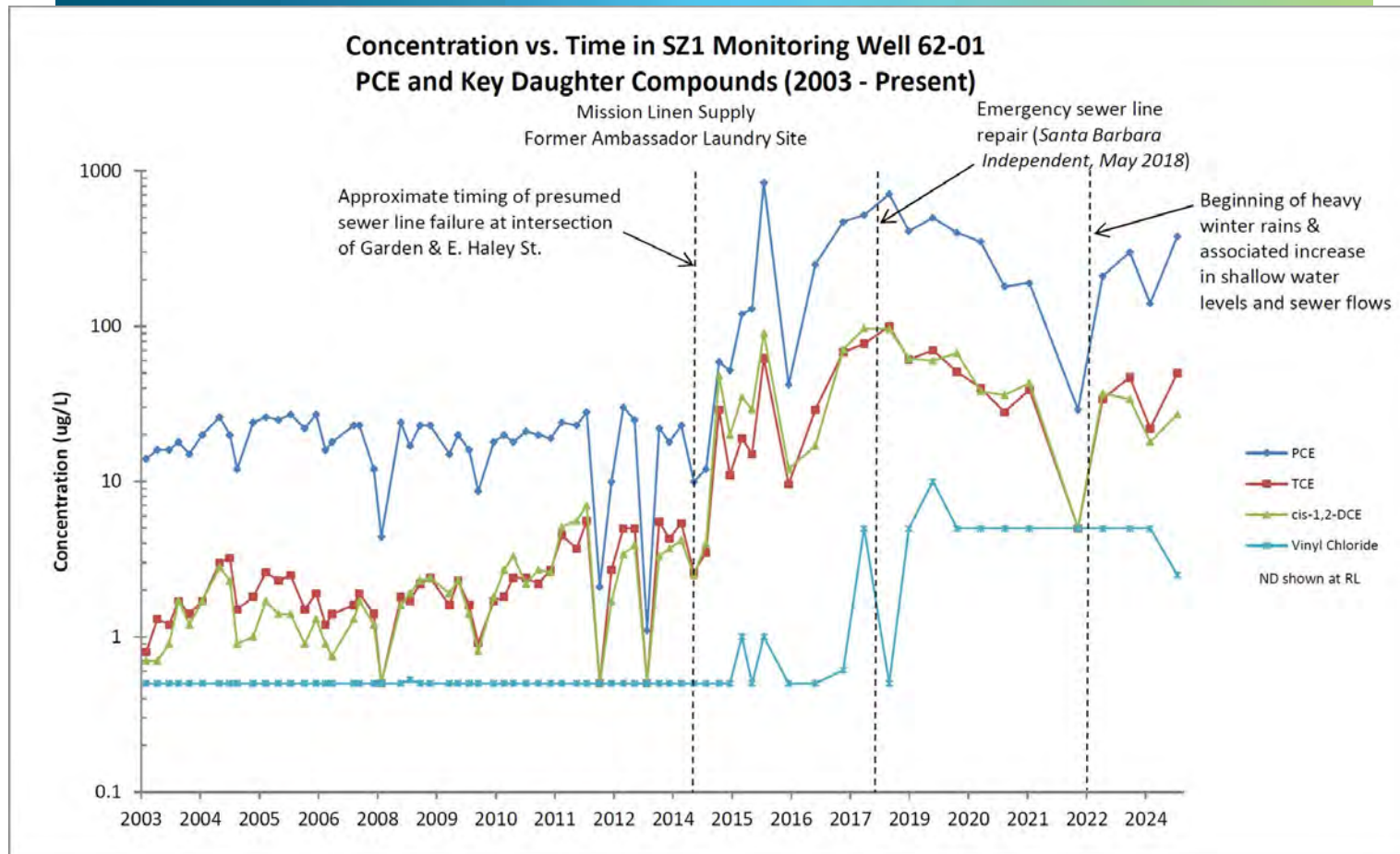
(modified after SWRCB, 1992)

Jacobs, Jacobs & Pennell, 2016

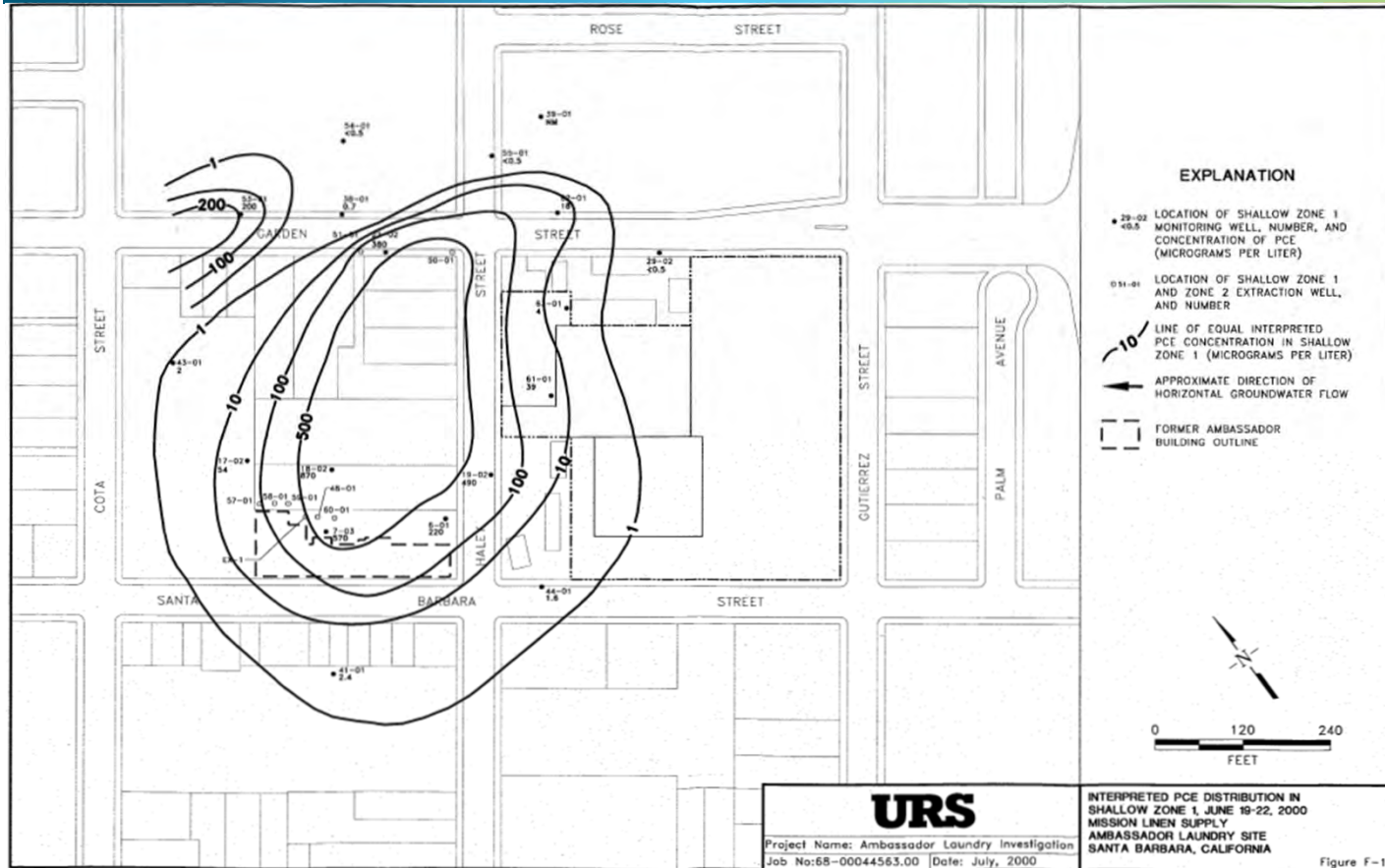
2018 Garden-East Haley Street Sewer Repair



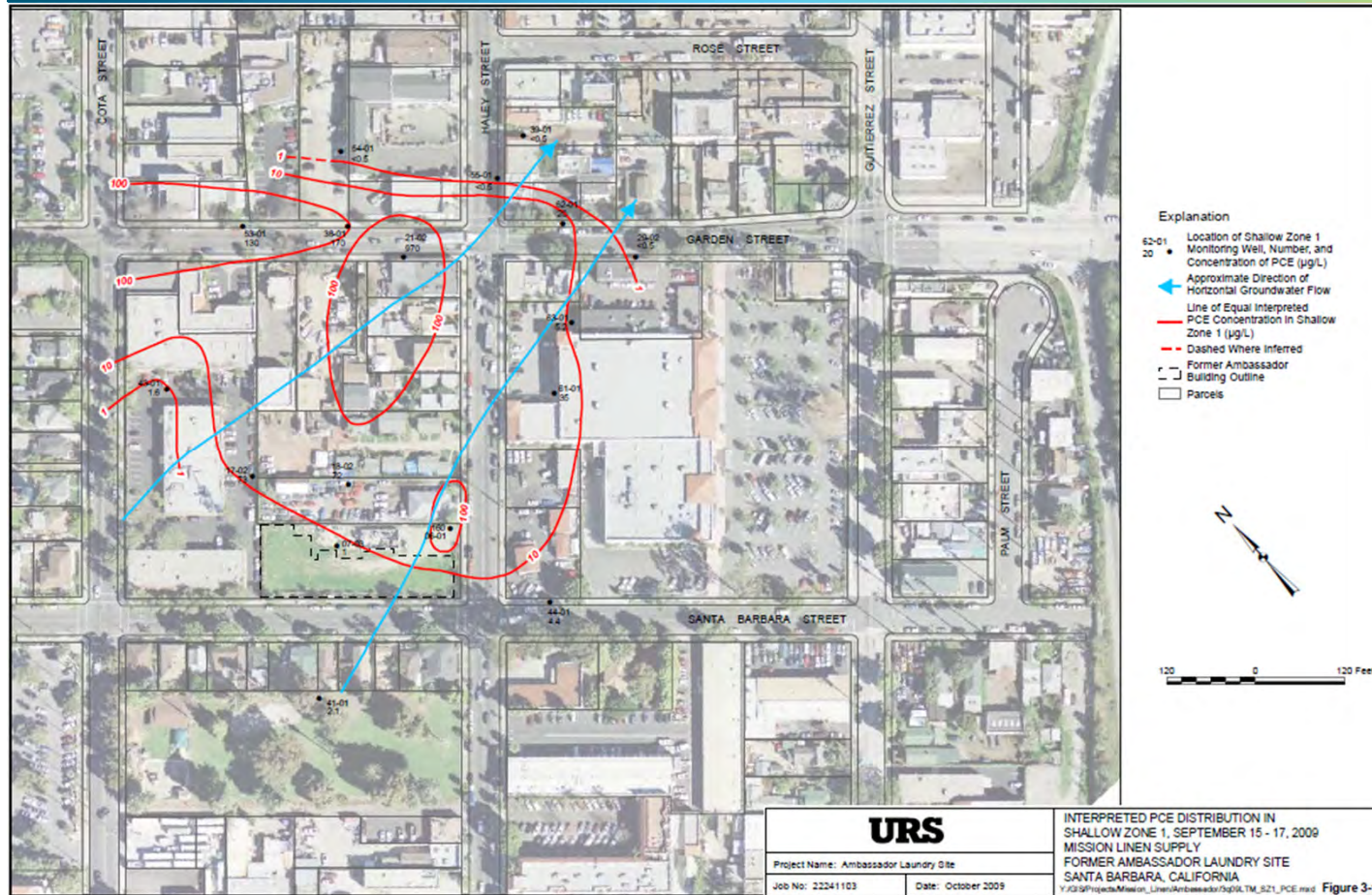
VOC Trends at 62-01



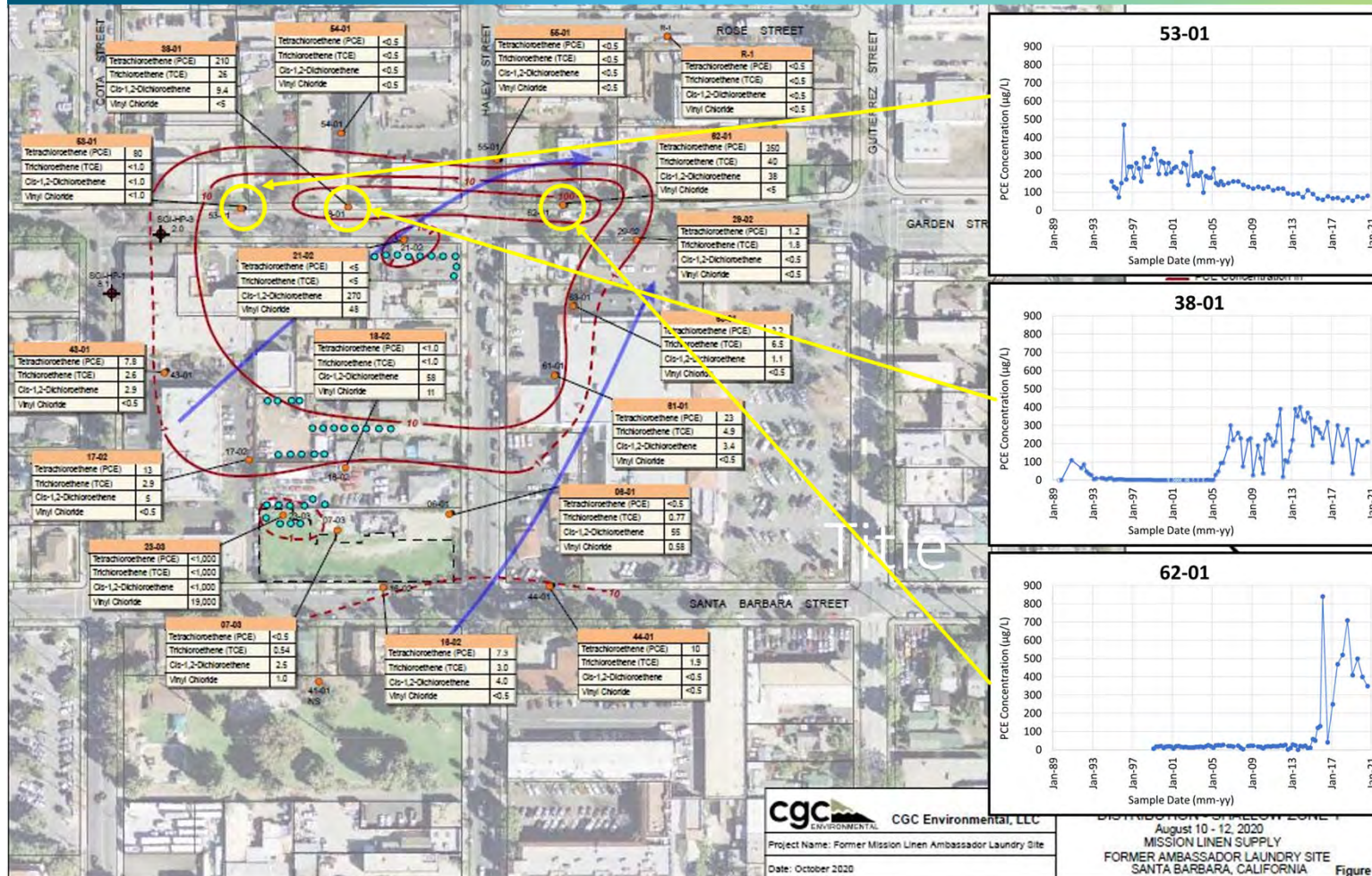
2000 PCE Distribution Along Garden Street



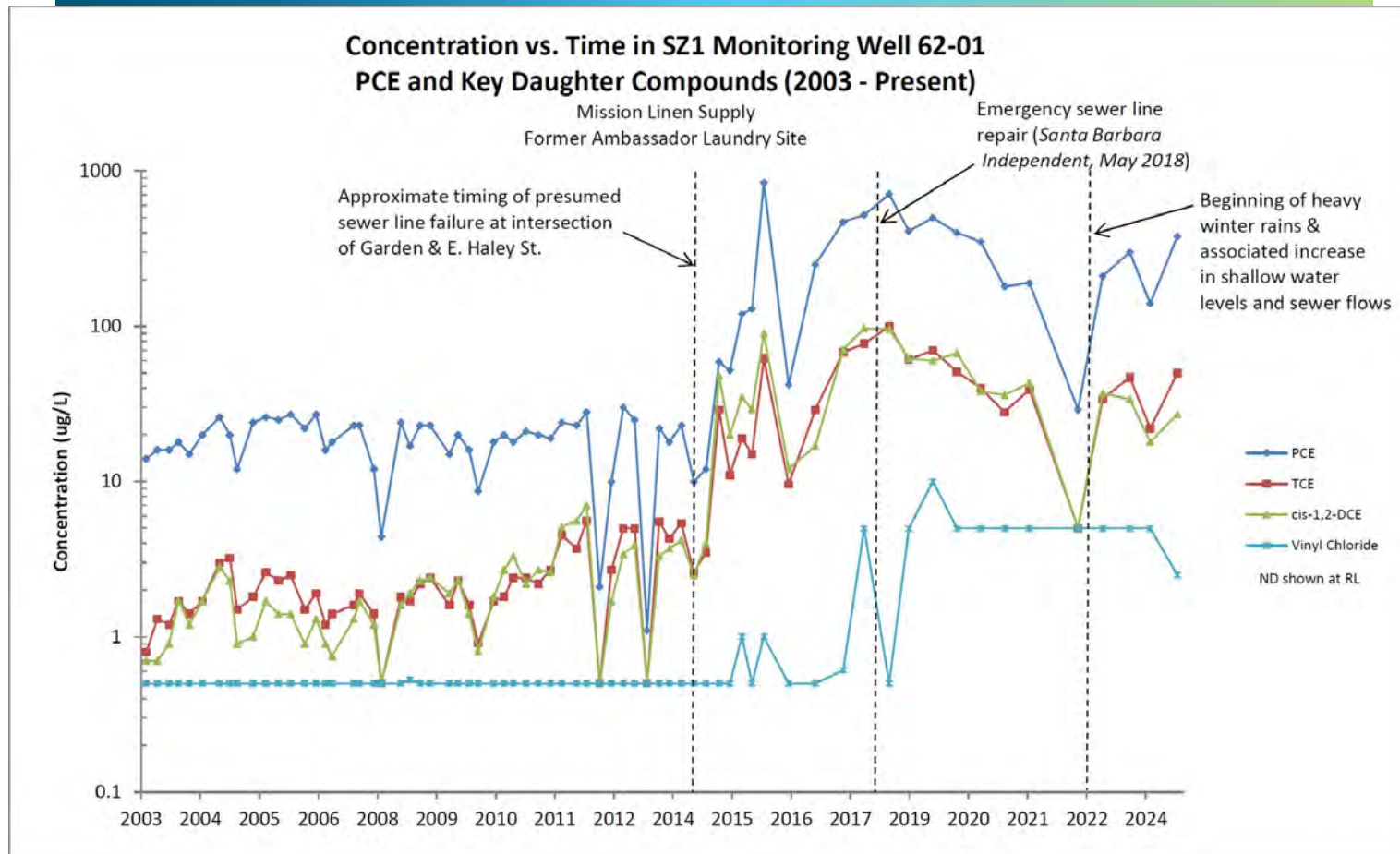
2009 PCE Distribution Along Garden Street



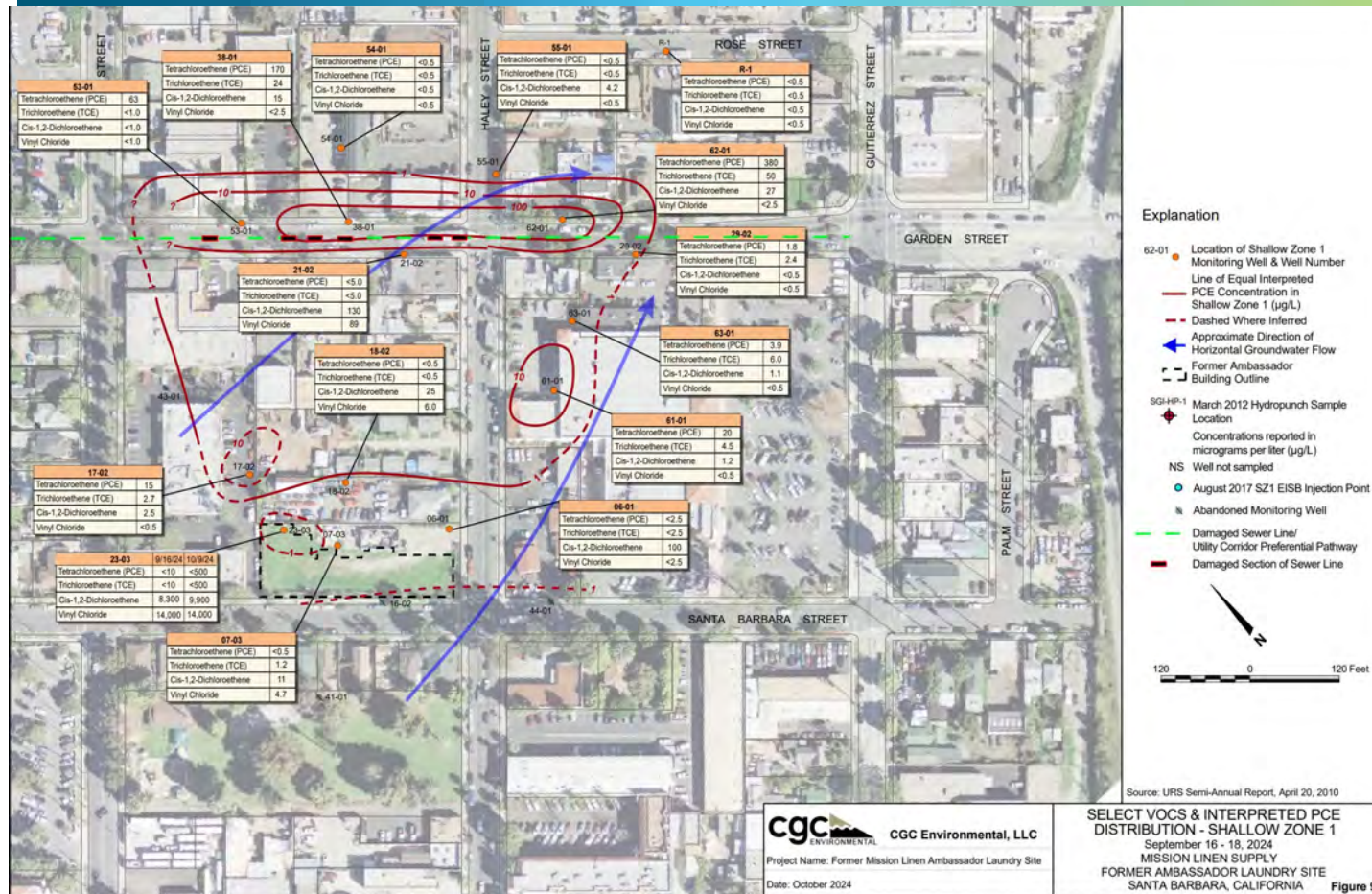
Garden Street Well Trends



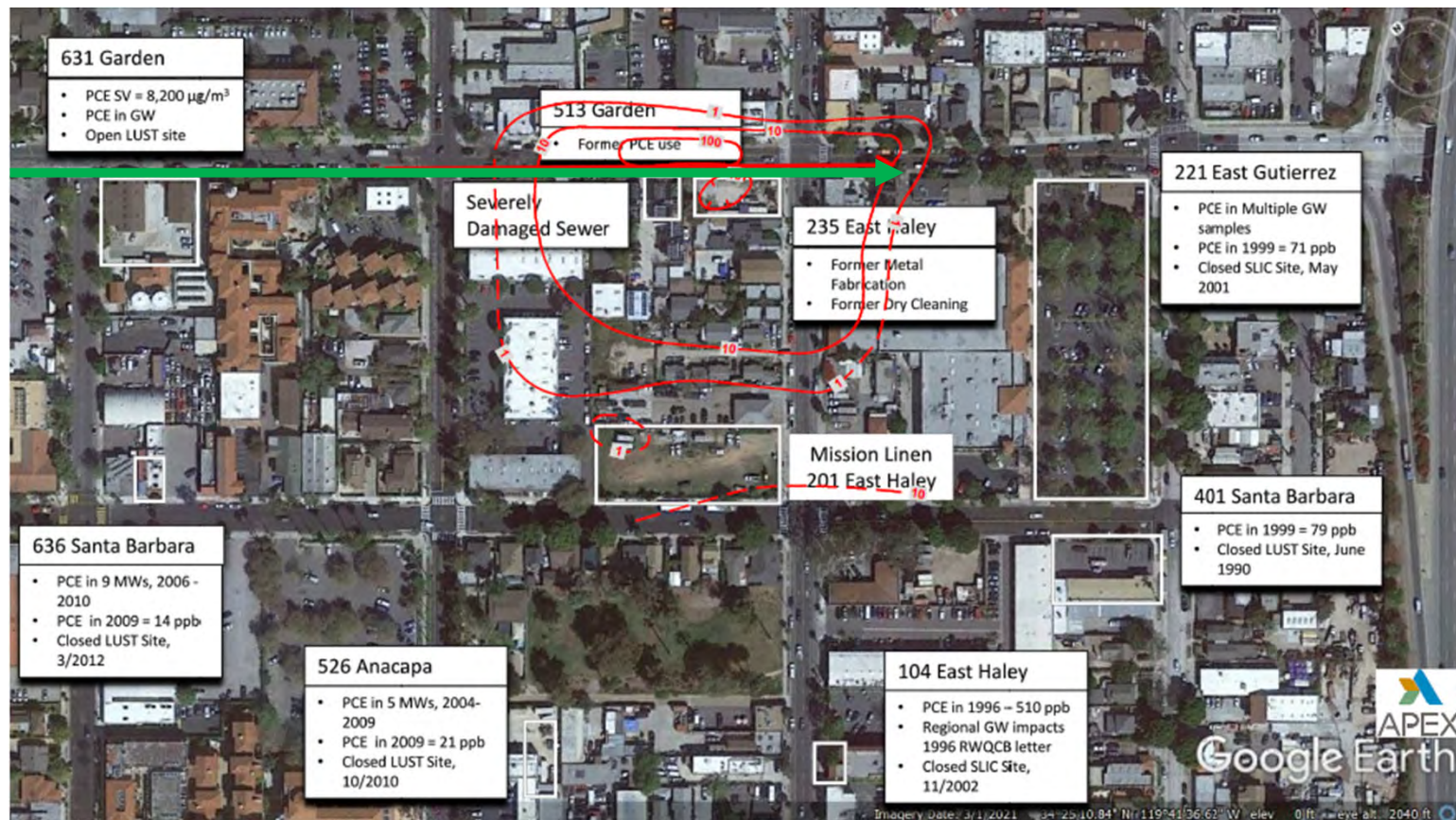
VOC Trends at 62-01



2024 PCE Distribution Along Garden Street

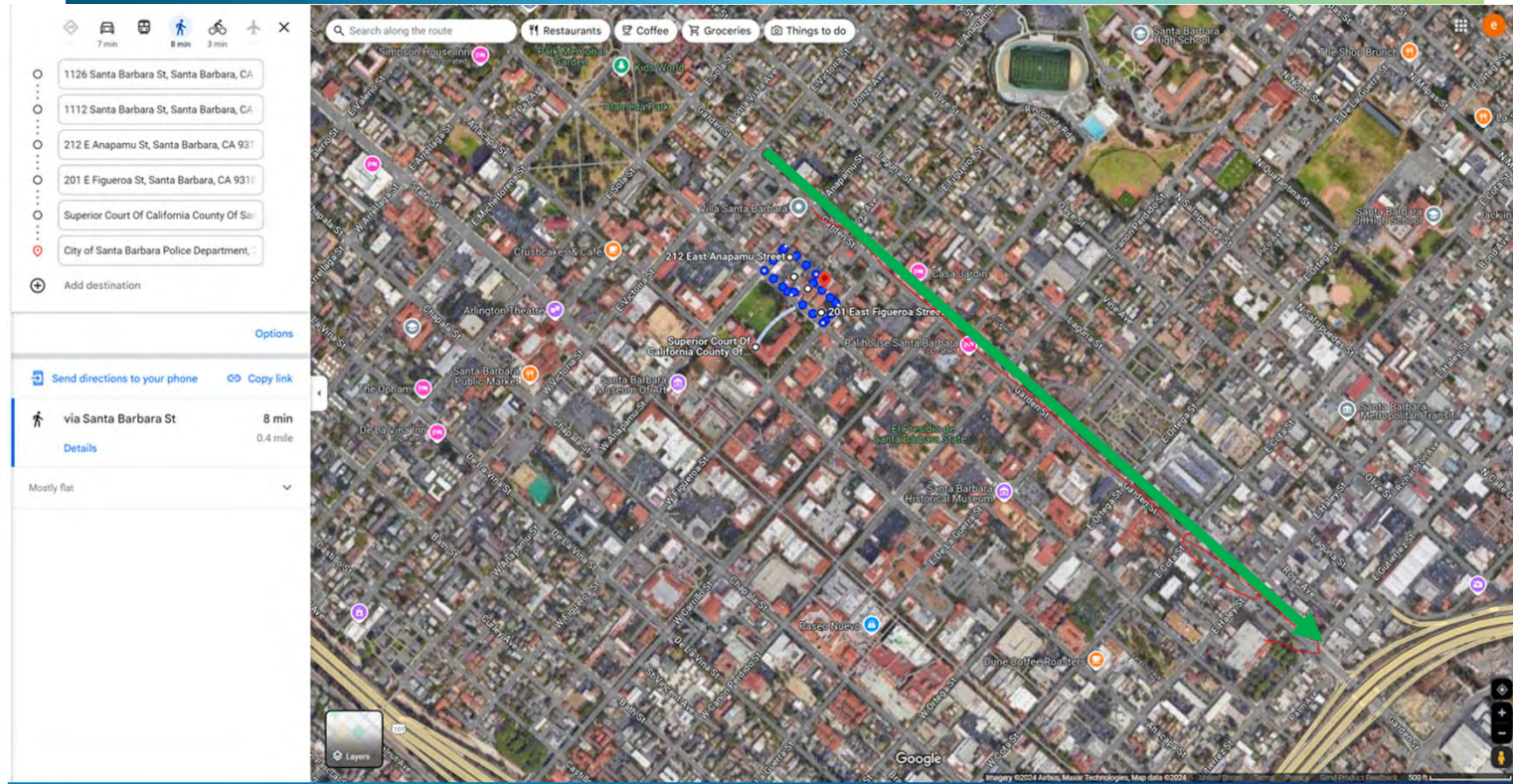


Offsite VOC Impacts in Area



→ Sewer flow direction

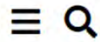
Offsite VOC Impacts in Area



→ Sewer flow direction



City of Santa Barbara Regional Sewer Issues



Santa Barbara
Independent

[Support the SB Independent](#)

[Tips](#)

BREAKING | Alisal Fire Burns On: 6,000 Acres, Zero Containment

×

City Hall and Channelkeeper Reach Sewage Settlement



City of Santa Barbara Regional Sewer Issues



City of Santa Barbara • Public Works Department

15

City of Santa Barbara Ongoing Sewer Repair and Rehabilitation Program



APPENDIX C
SUMMARY OF REMEDIAL ACTIONS

APPENDIX C

SUMMARY OF SOIL AND GROUNDWATER REMEDIAL ACTIONS

This appendix provides a summary of the remedial actions conducted at the site, including those outlined in the URS Corrective Action Plan (CAP; URS, 2010a) and subsequent RDIP's (URS, 2010d and SGI, 2011) approved by the RWQCB for source area and groundwater remediation conducted by URS and The Source Group (SGI; a division of Apex Companies) on behalf of Mission. This information is typically included in semi-annual groundwater reports prepared by CGC Environmental.

Interim Remedial Actions, 1992-2008

An SVE remediation system operated at the site between 1992 and 2002 to remove shallow, unsaturated soil contamination above the water table. A GWE&T system operated at the site between 1991 and late 2003. This system was effective in containing the PCE plume in groundwater and reducing average concentrations significantly (URS, 2010b), but was not capable of removing the remaining dissolved concentrations in groundwater to acceptable cleanup levels. Based on this, a more aggressive approach to groundwater cleanup using ISCO was employed as described in the Remedial Action Work Plan (RAWP) (URS, 2003). This work utilized modified Fenton's reagent and potassium permanganate and was performed by URS between September 2003 and December 2004 in three separate injection events. This program was effective in eliminating most of the chlorinated solvent mass in the source area in Shallow Zone 2 (historically the most contaminated zone). However, as a result of problems with surfacing of the reagent in Shallow Zone 1 in the source area, contamination in this zone was not adequately addressed. Further, in heavily developed down gradient areas, adequate distribution of the reagents was not achieved due to limited access and the transient nature of the reagent, especially modified Fenton's reagent (URS, 2010b). In 2008, an Interim Remedial Action consisting of ISCR was implemented at the downgradient property located at 235 East Haley Street. The ISCR program involved the injection of a carbon/zero-valent iron (C-ZVI) product into Shallow Zones 1 and 2 (URS, 2010a). Results of the ISCR showed limited success at reducing VOC concentrations. Discrete areas containing elevated PCE concentrations, disconnected from the source area, developed downgradient from the site. These areas were targeted by recent remedial actions, discussed below.

Remedial Actions Pursuant to RWQCB-Approved CAP

URS submitted the CAP to the RWQCB in August 2010 for remediation of remaining PCE-impacted source material in Shallow Zone 1 and for in situ remediation of impacted groundwater in Shallow Zones 1 and 2 (URS, 2010a). The CAP recommended that remaining source material in Shallow Zone 1 be addressed with excavation and onsite treatment with EDT. The recommended alternative for groundwater, EISB and MNA, was selected based on the results of pilot testing and screening of other remedial technologies. The soil and groundwater RDIPs (URS, 2010d; SGI, 2011) were

developed to outline implementation details for these selected remedial actions intended to address remaining chlorinated VOC impacts in soil and groundwater at the site. The sections below detail the source area and three phases of groundwater remedial activities completed pursuant to the CAP. Remedial effectiveness monitoring results collected since CAP implementation in 2011 have demonstrated that the groundwater plume is stable or reducing and the project has transitioned to the MNA component of the RWQCB-approved CAP.

Source Area Remedial Action, 2011

Remedial activities described in the source area RDIP were conducted by URS in late 2011 and included source area excavation, treatment, and backfilling activities. Approximately 2,100 cubic yards of soil were excavated and treated using EDT between August and December 2011. The EDT successfully reduced VOC levels to more than 10 times below the applicable Environmental Screening Level (ESL), allowing soil reuse as excavation backfill material. Backfill soil in the saturated zone was blended with the chemical reduction amendment Daramend®, at a 2 percent by weight ratio, to allow for additional bioremediation and chemical reduction of residual PCE in soil and groundwater in the source area. The source area RDIP activities are documented in the Source Area Remedial Action Completion Report (URS, 2012). Performance monitoring for soil gas and groundwater in the source area was performed during the period between July 2011 and December 2012.

Groundwater Remedial Actions, 2012 and 2014

The groundwater remedial actions implemented at the site beginning in 2012 were designed to address chlorinated VOCs remaining in groundwater below the site, downgradient properties, and in public right-of-ways in SZ1 and SZ2. Field implementation of the groundwater RDIP was conducted in March and April 2012. A total of 3,416 gallons of Emulsified Vegetable Oil (EVO) was injected at 119 points within eight biotreatment zones and within the source area. Details regarding the EISB injection work and initial monitoring events were presented in a Remedial Action Report submitted on August 15, 2012 (SGI, 2012). The Remedial Action Report discussed the field work completed, including the final number of injection points, locations, and substrate mass injected, and documented the methodologies used for data collection and any waste disposal. The performance evaluation of groundwater RDIP activities was presented in the Semi-Annual Groundwater Monitoring and Remedial Performance Report covering the first and second quarters of 2013 (CGC, 2013).

Based on groundwater concentrations remaining at the site, a second phase of EISB injections was performed in November 2014. The work was performed in accordance with the Phase II Enhanced In-Situ Bioremediation Program Work Plan, submitted April 15, 2014, and subsequent correspondence with the RWQCB regarding additional injection locations at 513 Garden Street after being granted access to the site prior to it being redeveloped. Between November 3 and 14, 2014, EVO was injected into 46 injection points across the site. A total of 3,168 gallons of EVO was injected within the SZ1, SZ2, and SZ3 groundwater intervals. Prior to the injection event, 13 effectiveness

monitoring wells were monitored to document baseline conditions, and the same wells were monitored for four quarters subsequent to the injection event, the first of which was the February 2015 event.

Groundwater Remedial Actions, 2017

Based on residual VOCs in groundwater beneath the site and at adjacent downgradient properties, Mission conducted a third EISB injection event (Phase III) in accordance with the RWQCB-approved CAP. RWQCB provided concurrence in a letter dated February 27, 2017. In this letter, RWQCB required Mission to submit a work plan describing planned EISB injection activities. This work plan was submitted to RWQCB on April 28, 2017 and approved by RWQCB in a letter dated May 22, 2017. In this approval letter, RWQCB requested 17 injection points be performed within SZ1 in addition to the injection points described in the work plan. Apex completed the Phase III injection event between August 8 and September 1, 2017 which consisted of injecting EVO at 46 injection points across the site and three downgradient properties. A total of 4,675 gallons of EVO was injected within SZ1, SZ2, and SZ3 groundwater intervals.

In order to evaluate remediation effectiveness, eight monitoring wells were initially utilized as performance monitoring wells (nine wells during the prior and current events). Additional parameters and analysis were collected from these wells during the site-wide semi-annual groundwater monitoring events conducted in October 2017, March 2018, September 2018 and February 2019. These wells continue to be monitored for VOCs and field parameters pH, dissolved oxygen (DO) and oxidation reduction potential (ORP) to demonstrate that groundwater conditions in the vicinity of EISB injections are supportive of anaerobic biotic dechlorination. Results from the performance monitoring wells are summarized in section 7.6.1 and provided in Table 7. Laboratory analytical results are included as Appendix B. Performance monitoring wells are shown on Figure 2.

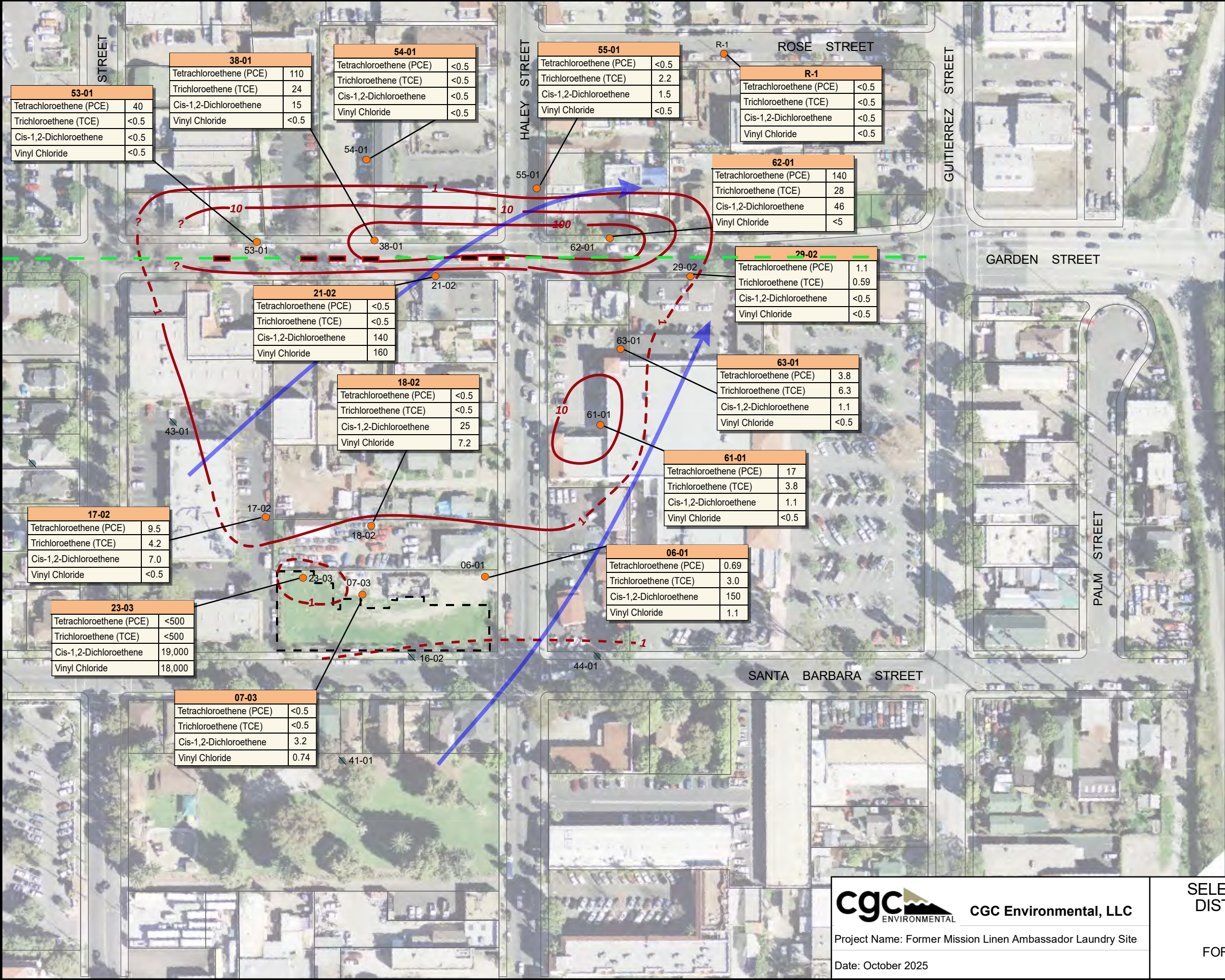
Groundwater Remedial Actions, 2023

Phase III EISB injection effectiveness monitoring data showed that VOCs, specifically PCE and TCE degradation compounds cis-1,2-DCE and vinyl chloride have persisted in the vicinity of SZ1 groundwater monitoring well 23-03 located within the former source area at the Site. Mission views these residual concentrations as an isolated “hot spot”, and an impediment to the goal of a low-threat closure request relative to the San Francisco Bay RWQCB’s Draft Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites, dated July 31, 2009. To reduce VOCs concentrations in the vicinity of groundwater monitoring well 23-03, Mission conducted a fourth EISB bioremediation injection event (Phase IV) in accordance with the RWQCB approved CAP. Apex submitted a work plan for this task on June 19, 2023, which was approved by the RWQB in a letter dated June 29, 2023. The Phase IV injection event was completed between July 18 to July 20, 2023 and is summarized in a report dated October 12, 2023. A total of 1,335 gallons of EISB substrate was distributed at seven locations in the vicinity of 23-03 within the SZ1 interval. The Phase IV injection event included multiple enhancements relative to the prior three EISB injection events to stimulate both biotic and abiotic VOC degradation pathways. The enhancements included the addition of 1) Dehalococcoides

sp., 2) Zero-Valent Iron, 3) magnesium oxide, 4) sodium ascorbate, and 5) guar to the EVO mixture. SZ1 well 23-03 is included in the performance monitoring network and will be used to monitor the performance of the Phase IV EISB injections.

APPENDIX D

**SELECT VOCS & INTERPRETED PCE DISTRIBUTION FIGURES – SZ1 THROUGH SZ4, JULY
2025 PREPARED BY CGC ENVIRONMENTAL**



Explanation

- 62-01 Location of Shallow Zone 1 Monitoring Well & Well Number
- Line of Equal Interpreted PCE Concentration in Shallow Zone 1 (µg/L)
- - - Dashed Where Inferred
- Approximate Direction of Horizontal Groundwater Flow
- Former Ambassador Building Outline
- SGL-HP-1 March 2012 Hydropunch Sample Location
- Concentrations reported in micrograms per liter (µg/L)
- NS Well not sampled
- August 2017 SZ1 EISB Injection Point
- Abandoned Monitoring Well
- Damaged Sewer Line/Utility Corridor Preferential Pathway
- Damaged Section of Sewer Line

Source: URS Semi-Annual Report, April 20, 2010



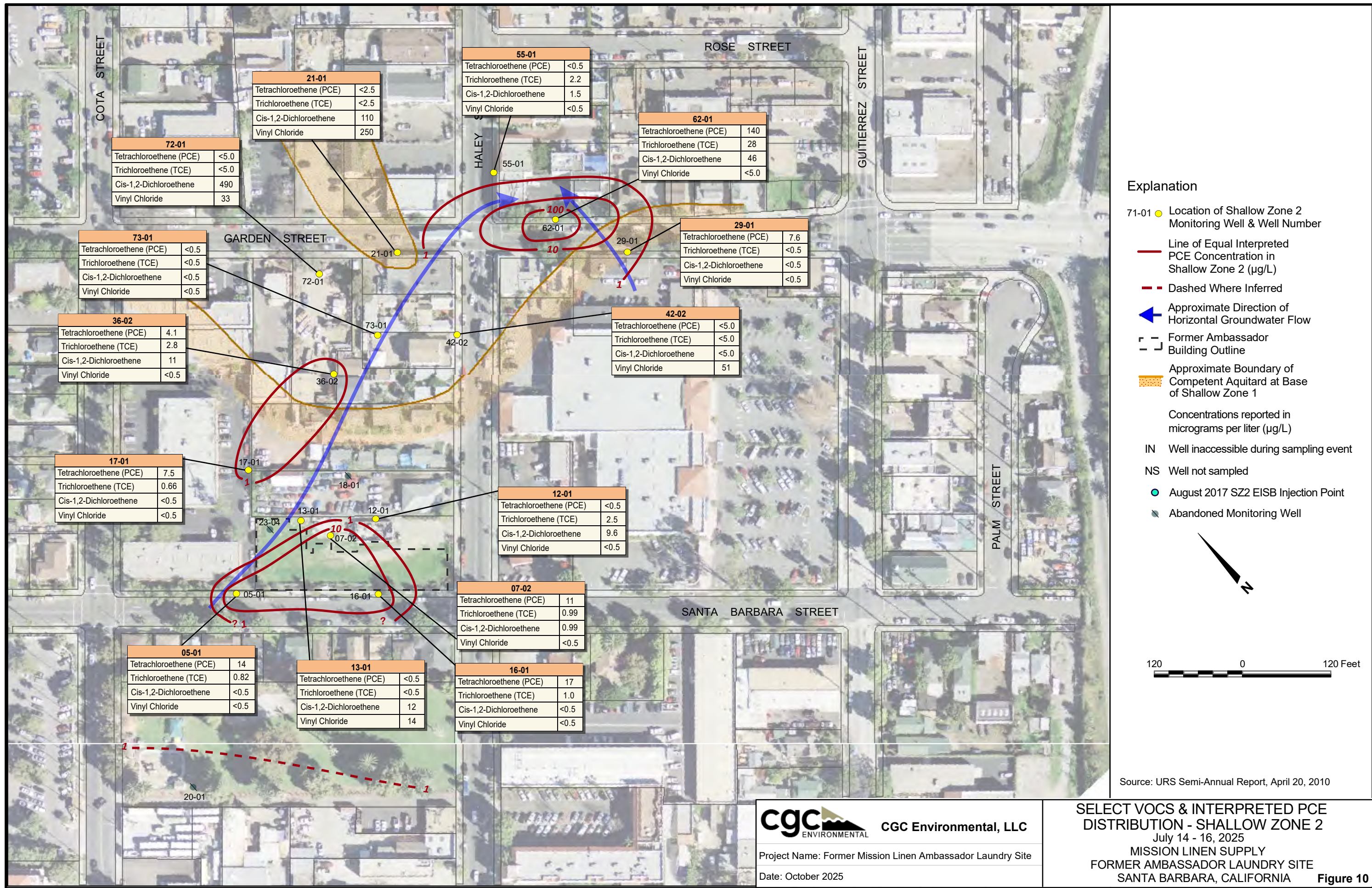
CGC Environmental, LLC

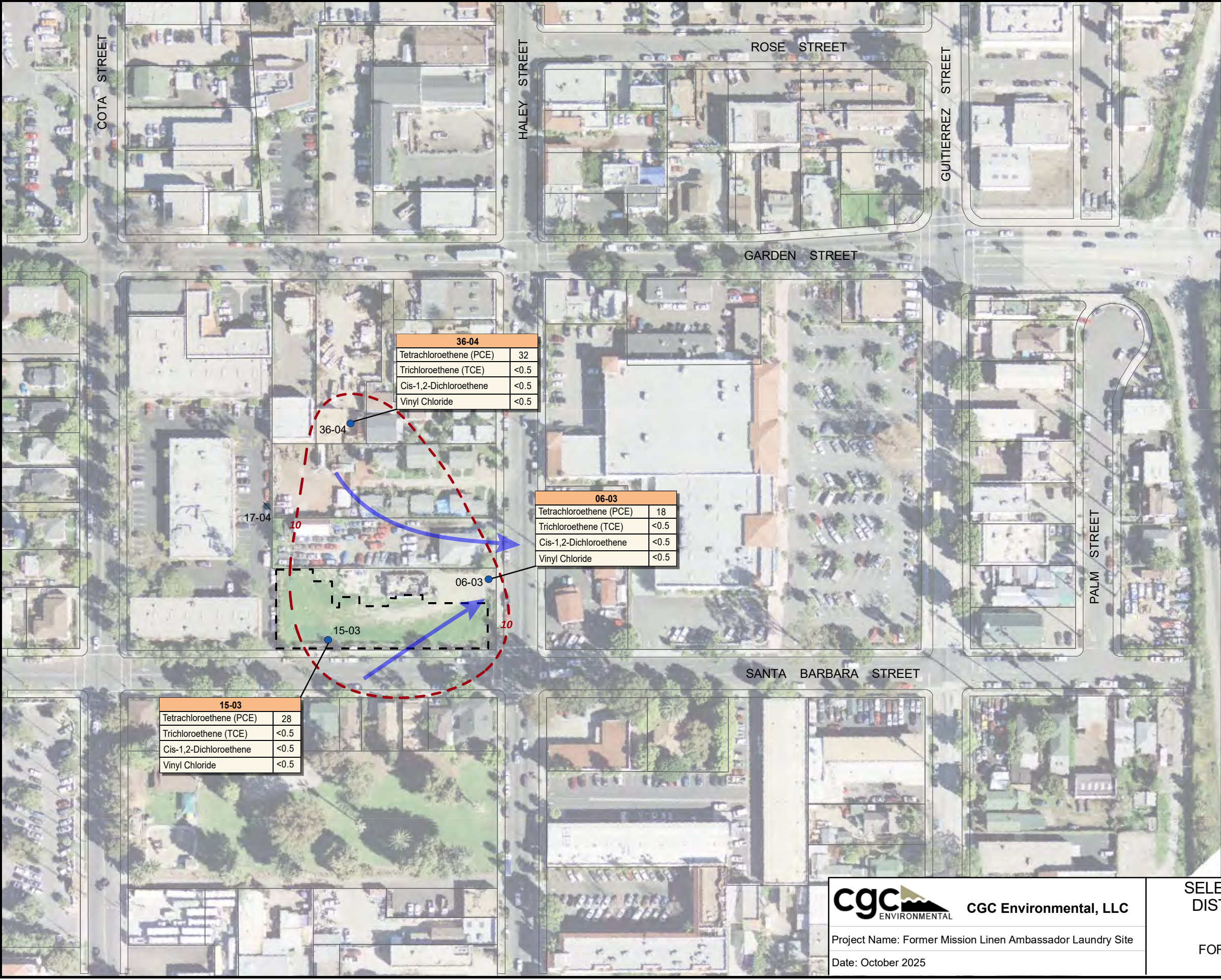
Project Name: Former Mission Linen Ambassador Laundry Site

Date: October 2025

SELECT VOCs & INTERPRETED PCE
DISTRIBUTION - SHALLOW ZONE 1
July 14 - 16, 2025
MISSION LINEN SUPPLY
FORMER AMBASSADOR LAUNDRY SITE
SANTA BARBARA, CALIFORNIA

Figure 9





- Explanation**
- 06-03 ● Location of Shallow Zone 4 Monitoring Well & Well Number
 - Line of Equal Interpreted PCE Concentration in Shallow Zone 4 (µg/L)
 - - - Dashed Where Inferred
 - ➡ Approximate Direction of Horizontal Groundwater Flow
 - ⌚ Former Ambassador Building Outline
 - Concentrations reported in micrograms per liter (µg/L)
 - IN Well not accessible during event
 - NS Well not sampled
 - ⦿ Abandoned Monitoring Well



Source: URS Semi-Annual Report, April 20, 2010

APPENDIX E
MAROS OVERVIEW

APPENDIX E

MAROS Overview

The following memorandum summarizes data analysis performed on available groundwater monitoring and sampling analytical results from the Former Mission Linen Supply, Former Ambassador Laundry site located at 201 East Haley Street, in Santa Barbara, California. The focus of this analysis was to assess groundwater contaminant plume behavior at the site. As guidance, the lines of evidence supporting natural attenuation were used to aid and organize data analysis.

In 1993, the National Research Council proposed three lines of evidence to assess natural attenuation processes. The three parts include:

- Decreasing trends in groundwater quality data for the contaminant of concern using historical data;
- Geochemical data indicative of biodegradation processes in the groundwater; and
- Microcosm studies to demonstrate degradation within the contaminated soil and groundwater system.

Typically, completion of analysis to assess the first two lines of evidence is sufficient to establish contaminant plume behavior and the relative importance of biodegradation processes.

MAROS (*Monitoring and Remediation Optimization System*) software was used to complete concentration trend and spatial moment analysis of groundwater analytical data gathered at the site since 1993. The MAROS program was developed in accordance with the Long-Term Monitoring Optimization (LTMO) Guide Version 2.2 developed by the Air Force Center for Environmental Excellence (AFCEE). MAROS is a database (Microsoft Access) application developed to assist users with groundwater trend analysis and LTMO at impacted groundwater sites. The MAROS software includes a module that performs statistical concentration trend analysis using both Mann-Kendall (a non-parametric statistical method) and Linear Regression (a parametric statistical method) analyses. The concentration trend analytical module allows for concentration trend analysis of data gathered from individual groundwater monitoring wells.

A summary description of statistical methods applied by MAROS to concentration trends observed at individual wells is as follows:

- Mann–Kendall Analysis (Non-parametric Procedure)

The Mann–Kendall analysis is a statistical procedure used for analyzing data trends over time. The procedure compares concentrations between events and determines a score related to whether the concentration increases (+1) stays the same (0), or decreases (-1). Cumulative trend scores indicate direction and magnitude of the overall concentration trend.

- Linear Regression Analysis (Parametric Procedure)

The Linear Regression analysis is a parametric statistical procedure that is typically used for analyzing trends in data over time. However, the data scatter can often mask overall concentration trends, which potentially introduces a greater degree of error. To complete linear regression analysis, MAROS first performs log transformation of data. The module then uses the method of least squares to obtain estimates of the model parameters (slope and y-intercept) that minimize the sum of the squared residuals (or error term). The module calculates a standard deviation or standard error of the slope, as well as a t-test value to find the degree of confidence in the trend. Additionally, the MAROS module calculates a coefficient of variation which is a statistical measure of how the individual data points vary about the mean value. The calculated slope, the confidence in trend, and the coefficient of variation are used in

combination to make a decision regarding the concentration trend exhibited by data from a given well under evaluation.

The MAROS calculation procedures used to complete the statistical tests summarized above are described in detail in Appendix A.2 of the MAROS instruction manual (not provided herewith, but available at <http://www.gsi-net.com/en/software/free-software/maros.html>).

Interpretation of Individual Well Statistical Test Results and Trends

The MAROS statistical analysis of groundwater concentration trends in individual groundwater monitoring wells was performed using both the Mann-Kendall statistic and the Linear Regression Analysis. Based upon the strength of statistical results derived by either statistical method, the concentration trend results are separated into six categories:

- Decreasing (D),
- Probably Decreasing (PD),
- Stable (S),
- No Trend (NT),
- Probably Increasing (PI), and
- Increasing (I).

The groundwater concentration trend analyses for the Site were conducted for tetrachloroethylene (PCE), trichloroethylene (TCE), cis-1,2-dichloroethylene (cis-1,2-DCE), and vinyl chloride (VC). TCE, cis-1,2-DCE, and vinyl chloride are 'daughter' or biological breakdown byproducts arising from anaerobic biodegradation of PCE. TCE may either be present at the site as either a parent material or byproduct of biodegradation. Groundwater analytical results collected from January 2016 to the present were used in the statistical analyses of in-well concentration trends.

The MAROS software requires at least four quantifiable (greater than or equal to the laboratory reporting limit) detections per constituent to perform the statistical analysis tests of concentration trends within individual wells. Conducting these statistical analyses for the time intervals specified will aid in the evaluation of the following issues relevant to site remediation and closure:

- Are groundwater concentrations of target constituents (e.g., PCE, TCE, cis-1,2-DCE, and VC) decreasing within the targeted area of concern?; and,
- Are groundwater concentrations of target chemical constituents remained steady or decreasing in downgradient, point-of-compliance wells?

Monitoring wells used for statistical analyses were organized according to the water-bearing intervals within which the well screen is constructed. The water-bearing intervals include Shallow Zone 1 (SZ1), Shallow Zone 2 (SZ2), Shallow Zone 3 (SZ3), and Shallow Zone 4 (SZ4). The total number of monitoring wells evaluated by zone are as follows:

- SZ1 – 14 monitoring wells were evaluated for concentration trends over time. Performance monitoring wells include 21-02, 23-03, and 62-01.
- SZ2 – 14 monitoring wells were evaluated for concentration trends over time. Performance monitoring wells include 13-01, 21-01, and 71-01.
- SZ3 – Twelve monitoring wells were evaluated for concentration trends over time. Performance monitoring wells include 18-03, 21-03, and 23-02.

- SZ4 – Three monitoring wells were evaluated for concentration trends over time.

The wells specified above are evaluated in only one water-bearing interval and are not shared among multiple intervals. The categorized concentration trend results for individual groundwater monitoring wells for the time interval defined above is included in the MAROS reports attached to this appendix (Attachment F-1).

Categorized trend results for both the Mann-Kendall and Linear Regression statistical methods are summarized in the MAROS report tables. These tables also identify the location designation of each groundwater monitoring well (source versus tail). The MAROS program outputs of Mann-Kendall and Linear Regression trend analyses for PCE, TCE, cis-1,2-DCE, and VC are provided in Attachment F-1.

Summary of Site-specific MAROS Assessment

The Mann-Kendall and Linear Regression statistical analytical results from the assessment of groundwater concentration data (from 2016 to Third Quarter 2025) generally show concentration trends that indicate significant 'decreasing', 'probably decreasing', or 'stable' trends over time. Also, a significant proportion of wells were designated 'ND' over the evaluated time interval – meaning all analytical results were non-detect.

Key findings of these statistical analyses by zone are as follows:

SZ1

- Since 2016, PCE has not been detected in three of the 14 SZ1 monitoring wells (23-03, 54-01, and 55-01). Two of the 14 SZ1 monitoring wells exhibited PCE concentrations designated as 'No Trend' (06-01 and 18-02). Five of the 14 SZ1 monitoring wells exhibited PCE trends that were designated as either 'Stable', 'Probably Decreasing' or 'Decreasing' over time (07-03, 21-02, 38-01, 53-01, and 62-01). Four monitoring wells (17-02, 29-02, 61-01, and 63-01) exhibited either 'Increasing' or 'Probably Increasing' trends in at least one statistical test over the time interval. PCE concentrations in 17-02 have ranged from ND<0.5 to 26 µg/L over the past nine years, with the most recent result at 9.0 µg/L. PCE concentrations in 29-02 were at or below the MCL (5.0 µg/L) over the past nine years (ranging from ND<0.5 to 1.8 µg/L, with the most recent result at 1.1 µg/L). PCE concentrations in 61-01 have ranged from 7.1 to 35 µg/L over the past nine years, with the most recent result at 17 µg/L. PCE concentrations in 63-01 have ranged from 2.7 to 8.9 µg/L over the past nine years, with the most recent result at 3.8 µg/L.
- TCE was detected in all of the 14 SZ1 monitoring wells. Two of the 14 SZ1 monitoring wells exhibit TCE concentrations designated as 'No Trend' (23-03 and 38-01). Nine of the 14 SZ1 monitoring wells (07-03, 18-02, 21-02, 53-01, 54-01, 55-01, 61-01, 62-01, and 63-01) exhibited TCE concentrations that were designated as either 'Stable or 'Decreasing', or 'Probably Decreasing' over time in at least one statistical test. Three wells (06-01, 17-02, and 29-02) exhibited 'Increasing' or 'Probably Increasing' trends in at least one statistical test. However, TCE levels detected in monitoring well 06-01 were at or below the MCL (5.0 µg/L) over the past nine years (most recent at 3.0 µg/L). TCE levels detected in monitoring well 17-02 were at or below the MCL (5.0 µg/L) over the past nine years (most recent at 4.2 µg/L). TCE concentrations detected in monitoring well 29-02 have been below the MCL (5.0 µg/L) for the past nine years (most recent at 0.59 µg/L).
- Cis-1,2-DCE has not detected in 2 of the 14 SZ1 monitoring wells over the past nine years (53-01 and 54-01). One of the 14 SZ1 monitoring wells exhibit cis-1,2-DCE concentrations designated as 'No Trend' (23-03). Six of the 14 SZ1 monitoring wells (17-02, 21-02, 29-02, 61-01, 62-01, and 63-01) exhibited cis-1,2-DCE concentrations that were designated as 'Stable', 'Probably Decreasing', or 'Decreasing' over

time in at least one of the statistical tests. Four wells (06-01, 07-03, 18-02, and 55-01) exhibited 'Increasing' or 'Probably Increasing' trends in at least one statistical test. cis-1,2-DCE concentrations in monitoring well 06-01 have ranged from 1.4 to 150 µg/L over the past nine years, with the most recent detection at 150 µg/L. Cis-1,2-DCE concentrations in monitoring well 07-03 have ranged from ND<0.5 to 11 µg/L over the past nine years, with the most recent detection at 3.0 µg/L. Cis-1,2-DCE concentrations in monitoring well 18-02 have ranged from 1.6 to 58 µg/L over the past nine years, with the most recent detection at 25 µg/L. Cis-1,2-DCE concentrations detected in monitoring well 55-01 have ranged from ND<0.5 to 4.2 µg/L over the past nine years, with the most recent detection at 1.5 µg/L.

- Vinyl Chloride (VC) was not detected in six of the 14 SZ1 monitoring wells (29-02, 38-01, 53-01, 54-01, 55-01, and 61-01). One of the 16 SZ1 monitoring wells (23-03) exhibit VC concentrations designated as 'No Trend.' Two of the 16 SZ1 monitoring wells exhibited VC concentrations that were designated as either 'Stable' or 'Decreasing' over time (17-02 and 63-01). Five SZ1 monitoring wells (06-01, 07-03, 18-02 and 62-01) exhibited VC concentrations trends designated as 'Increasing' or 'Probably Increasing' over the evaluated time interval in at least one statistical test. VC concentrations in monitoring well 06-01 have ranged from ND<0.5 to 1.3 µg/L, and most recently at 1.1 µg/L. VC concentrations in monitoring well 07-03 have ranged from ND<0.5 to 4.7 µg/L, and most recently at 0.74 µg/L. VC concentrations in monitoring well 18-02 have ranged from ND<0.5 to 20 µg/L, and most recently at 7.2 µg/L. VC concentrations in monitoring well 21-02 have ranged from ND<5.0 to 160 µg/L, and most recently at 160 µg/L. In monitoring well 62-01, all but one sample result for VC has been non-detect over the past nine years, with the sole detection at 0.61 µg/L (August 2017).

SZ2

- Since 2016, PCE has not been detected in two of the 14 SZ2 monitoring wells (55-01 and 73-01). Six of the SZ2 monitoring wells exhibited PCE concentrations that were designated as either 'Stable' or 'Decreasing' in at least one statistical test (12-01, 13-01, 21-01, 36-02, 62-01, and 72-01). Six monitoring wells (05-01, 07-02, 16-01, 17-01, 29-01, and 42-02) exhibited PCE concentration trends designated as 'Increasing' or 'Probably Increasing.' Over the past nine years, PCE concentrations in monitoring well 05-01 have ranged from 8.7 to 19 µg/L, with the most recent detection at 14 µg/L. PCE concentrations in monitoring well 07-02 have ranged from ND<0.5 to 15 µg/L, with the most recent detection at 11 µg/L. Over the past nine years, PCE concentrations in monitoring well 16-01 ranged from 7.8 to 20 µg/L, and most recently at 17 µg/L. PCE concentrations in monitoring well 17-01 have been at or below the MCL, with the most recent detection at 7.5 µg/L. PCE concentrations in monitoring well 29-01 have been generally below the MCL (5.0 µg/L), with the most recent detection at 7.6 µg/L. PCE concentrations in monitoring well 42-02 have been at or below the MCL (5.0 µg/L), and the nine most-recent analytical results from 42-02 were non-detect.
- TCE was detected in all of the 14 SZ2 monitoring wells. Three of the 14 SZ2 wells exhibit TCE concentration trends designated as 'No Trend' (05-01, 21-01, and 73-01). Eight of the 14 SZ2 monitoring wells exhibited TCE concentrations that were designated as 'Stable' or 'Probably Decreasing' (13-01, 16-01, 17-01, 29-01, 36-02, 55-01, 62-01 and 72-01). Three SZ2 monitoring wells exhibited TCE concentration trends that were designated either 'Probably Increasing' or 'Increasing' in at least one of the statistical tests (07-02, 12-01, and 42-02). However, TCE detections in monitoring well 07-02 are below the MCL of 5 µg/L, and the most-recent result was 0.99 µg/L. TCE detections in monitoring well 12-01 have ranged from ND<0.5 to 2.5 µg/L over the past nine years, with the most recent result at 2.5

µg/L. TCE detections in monitoring well 42-02 have ranged from ND<0.5 to 24 µg/L over the past nine years, with the most recent result at ND<5.0 µg/L.

- Cis-1,2-DCE was not detected in three of the 14 SZ2 monitoring wells (05-01, 16-01, and 29-01). One of the 18 SZ2 wells exhibit cis-1,2-DCE concentration trends designated as 'No Trend' (36-02). Eight of the SZ2 wells exhibited cis-1,2-DCE concentration trends designated as either 'Stable', 'Probably Decreasing', or 'Decreasing' in at least one of the statistical tests (07-02, 13-01, 17-01, 21-01, 42-02, 62-01, 72-01 and 73-01). Two SZ2 monitoring wells exhibited cis-1,2-DCE concentration trends that were designated as 'Increasing' or 'Probably Increasing' in at least statistical test (12-01 and 55-01). Since 2016, cis-1,2-DCE detections in monitoring well 12-01 have ranged from ND<0.5 to 12 µg/L, with the most recent result being 9.6 µg/L. Cis-1,2-DCE concentrations detected in monitoring well 55-01 have ranged from ND<0.5 to 4.2 µg/L, with the most recent result at 1.5 µg/L.
- VC was not detected in five of the 14 SZ2 monitoring wells (05-01, 16-01, 17-01, 29-01, and 55-01). One of the 14 SZ2 wells exhibit VC concentration trends designated as 'No Trend' (73-01). Five of the SZ2 wells exhibited VC concentration trends designated as either 'Stable' or 'Decreasing' (07-02, 12-01, 13-01, 36-02, and 42-02). Three SZ2 monitoring wells exhibited VC concentration trends that were designated as 'Increasing' or 'Probably Increasing' in at least one statistical test (21-01, 62-01, and 72-01). VC concentrations in monitoring well 21-01 have ranged from 1.2 to 250 µg/L, with the most recent result being 250 µg/L. VC concentrations in monitoring well 62-01 have been non-detect with one detection in August 2017 (0.61 µg/L). VC concentrations in 72-01 have ranged from ND<0.5 to 33 µg/L over the evaluated time interval, with the most-recent detection at 33 µg/L.

SZ3

- Since 2016, PCE has been detected in all SZ3 monitoring wells. Two of the ten SZ3 monitoring wells (07-01 and 16-03) exhibit PCE concentration trends that are designated as 'No Trend'. Two of the ten SZ3 monitoring wells (18-03, and 56-01) exhibit PCE concentration trends that are designated as 'Stable', 'Probably Decreasing', or 'Decreasing' in at least one of the statistical tests. Six of the ten SZ3 monitoring wells (19-03, 21-03, 23-02, 29-03, 41-02, and 42-03) exhibit PCE concentration trends that are designated as 'Increasing' in at least one of the statistical tests. Over the past nine years, PCE concentrations detected in monitoring well 19-03 have ranged from 1.4 to 19 µg/L over the evaluated time interval, and most recently detected at 19 µg/L. PCE concentrations detected in 21-03 have ranged from 58 to 120 µg/L, and most recently detected at 99 µg/L. PCE concentrations detected in 23-02 have ranged from ND<1.0 to 88 µg/L over the evaluated time interval, and most recently detected at 51 µg/L. PCE concentrations detected in 29-03 have ranged from ND<1.0 to 3.1 µg/L over the evaluated time interval, and most recently detected at 3.2 µg/L. PCE concentrations detected in 41-02 have ranged from 8.6 to 16 µg/L over the past nine years, and most recently detected at 14 µg/L. PCE concentrations detected in 42-03 have ranged from 26 to 47 µg/L over the past nine years, and most recently detected at 42 µg/L.
- TCE was not detected in two of the ten SZ3 monitoring wells (29-03 and 42-03). One of the ten SZ3 monitoring wells (07-01) exhibited concentration trends that are designated as 'No Trend'. Three of the ten SZ3 monitoring wells (16-03, 18-03, 19-03) exhibit PCE concentration trends that are designated as 'Decreasing' or 'Probably Decreasing' in at least one of the statistical tests. TCE concentration trends were designated as 'Probably Increasing' or 'Increasing' in four monitoring wells (21-03, 23-02, 41-02, and 56-01) over the evaluated time interval. TCE concentrations detected in monitoring well 21-03 are below the MCL (5.0 µg/L), and range between ND<0.5 µg/L and 3.0 µg/L, and most recently detected at

3.0 µg/L. TCE concentrations detected in monitoring well 23-02 have ranged from ND<0.5 to 8.2 µg/L, and most recently detected at 2.1 µg/L. TCE concentrations detected in monitoring well 41-02 have generally been below the MCL (5.0 µg/L) during the evaluated time interval, with the most result being 1.8 µg/L. TCE concentrations detected in monitoring well 56-01 have generally been below the MCL (5.0 µg/L) during the evaluated time interval, with the exception of the August 2022 sampling event (5.9 µg/L).

- Cis-1,2-DCE has not been detected in four of the ten SZ3 monitoring wells (16-03, 19-03, 29-03, and 41-02). Cis-1,2-DCE concentration trends in monitoring wells 07-01, 18-03 and 23-02 were designated as 'No Trend'. Cis-1,2-DCE trends were designated as 'Decreasing', or 'Stable' in at least one of the statistical tests for well 42-03. Two of the ten SZ3 monitoring wells (21-03 and 56-01) exhibited concentration trends designated at 'Increasing' in at least one statistical test. Cis-1,2-DCE concentrations detected in monitoring wells 21-03 have been non-detect (ND<0.5 to ND<2.5 µg/L) with one exception in February 2025 (1.7 µg/L). Cis-1,2-DCE concentrations detected in monitoring wells 56-01 have ranged from ND<0.5 to 35 µg/L, and most recently detected at 5.6 µg/L.
- VC has not been detected in seven of the ten SZ3 monitoring wells (16-03, 19-03, 21-03, 29-03, 41-02, 42-03, and 56-01). VC trends in monitoring well 23-02 were designated as 'No Trend.' VC trends in monitoring well 07-01 was designated as 'Decreasing', or 'Stable' in at least one of the statistical tests. One of the SZ3 wells, 18-03, exhibited VC concentration trends designated as 'Probably Increasing' or 'Increasing' in at least one statistical test. VC concentrations detected in monitoring well 18-03 have ranged from ND<0.5 to 5.1 µg/L, and most recently detected at 4.6 µg/L.

SZ4

- Since 2016, PCE has been detected in all the SZ4 monitoring wells. PCE trends in monitoring well 36-04 was designated as 'No Trend' in both statistical tests. Monitoring wells 06-03 and 15-03 exhibited concentration trends were designated as either 'Probably increasing' or 'Increasing' in at least one statistical test. In general, concentrations of PCE in monitoring well 06-03 range from 10 to 22 µg/L during the evaluated time interval, and most recently detected at 18 µg/L. Concentrations of PCE in monitoring well 15-03 ranged from 15 to 37 µg/L during the evaluated time interval, and most recently detected at 28 µg/L.
- TCE has not been detected in two of the three SZ4 wells (15-03 and 36-04). TCE trends over time in monitoring well 06-03 was designated as either 'Probably Decreasing' or 'Stable' using both statistical tests. TCE concentrations detected in 06-03 range from ND<0.5 to 1.2 µg/L during the evaluated time interval, and below the MCL of 5.0 µg/L.
- Cis-1,2-DCE has not been detected in any of the three SZ4 monitoring wells (06-03, 15-03, and 36-04).
- VC has not been detected in any of the three SZ4 monitoring wells (06-03, 15-03, and 36-04).

APPENDIX E-1

MAROS MANN-KENDALL, LINEAR REGRESSION, AND COMBINED SUMMARY REPORTS

MAROS Mann-Kendall Statistics Summary

Project: Mission Ambassador - SZ1

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Coefficient of Variation	Mann-Kendall Statistic	Confidence in Trend	All Samples "ND" ?	Concentration Trend
cis-1,2-DICHLOROETHYLENE								
06-01	T	16	16	1.08	85	100.0%	No	I
07-03	T	16	10	1.07	39	95.7%	No	I
17-02	T	16	16	0.66	-8	62.2%	No	S
18-02	T	16	15	0.74	24	84.7%	No	NT
21-02	T	19	19	0.46	-65	98.8%	No	D
23-03	S	19	16	1.62	22	76.6%	No	NT
29-02	T	16	1	0.31	-26	86.7%	No	S
38-01	T	19	18	0.50	56	97.3%	No	I
53-01	T	19	0	0.34	26	80.7%	Yes	ND
54-01	T	12	0	0.32	-15	82.8%	Yes	ND
55-01	T	12	5	1.01	21	91.3%	No	PI
61-01	T	16	15	0.52	-12	68.7%	No	S
62-01	T	19	18	0.62	-59	97.9%	No	D
63-01	T	16	16	2.58	-18	77.5%	No	NT
TETRACHLOROETHYLENE(PCE)								
06-01	T	16	5	1.28	-20	80.1%	No	NT
07-03	T	16	4	0.94	-51	98.9%	No	D
17-02	T	16	13	0.64	50	98.7%	No	I
18-02	T	16	3	0.61	9	63.9%	No	NT
21-02	T	19	3	1.81	-37	89.5%	No	NT
23-03	S	19	0	1.63	31	85.1%	Yes	ND
29-02	T	16	7	0.53	54	99.2%	No	I
38-01	T	19	19	0.38	-69	99.2%	No	D
53-01	T	19	19	0.17	-43	92.8%	No	PD
54-01	T	12	0	0.32	-15	82.8%	Yes	ND
55-01	T	12	0	0.32	-15	82.8%	Yes	ND
61-01	T	16	16	0.43	29	89.5%	No	NT
62-01	T	19	19	0.65	-68	99.1%	No	D
63-01	T	16	16	0.38	12	68.7%	No	NT
TRICHLOROETHYLENE (TCE)								
06-01	T	16	8	0.85	15	73.3%	No	NT
07-03	T	16	4	0.43	-17	76.1%	No	S
17-02	T	16	15	0.47	46	97.9%	No	I
18-02	T	16	3	1.23	9	63.9%	No	NT
21-02	T	19	3	1.80	-33	86.7%	No	NT
23-03	S	19	1	1.59	28	82.5%	No	NT

Project: Mission Ambassador - SZ1

User Name: DLG

Location: Santa Barbara

State: California

Well	Source/ Tail	Number of Samples	Number of Detects	Coefficient of Variation	Mann-Kendall Statistic	Confidence in Trend	All Samples "ND" ?	Concentration Trend
TRICHLOROETHYLENE (TCE)								
29-02	T	16	7	0.78	50	98.7%	No	I
38-01	T	19	19	0.33	3	52.7%	No	NT
53-01	T	19	8	0.26	0	48.6%	No	S
54-01	T	12	1	0.35	-16	84.5%	No	S
55-01	T	12	1	0.77	-4	58.0%	No	S
61-01	T	16	16	0.43	-21	81.3%	No	S
62-01	T	19	18	0.55	-56	97.3%	No	D
63-01	T	16	16	0.47	-66	99.9%	No	D
VINYL CHLORIDE								
06-01	T	16	6	0.69	38	95.2%	No	I
07-03	T	16	8	0.97	34	93.0%	No	PI
17-02	T	16	4	1.39	-59	99.7%	No	D
18-02	T	16	14	0.76	11	67.1%	No	NT
21-02	T	20	19	0.78	70	98.8%	No	I
23-03	S	20	20	1.00	19	71.8%	No	NT
29-02	T	16	0	0.28	-23	83.6%	Yes	ND
38-01	T	20	0	0.83	8	58.9%	Yes	ND
53-01	T	20	0	0.37	21	74.0%	Yes	ND
54-01	T	12	0	0.32	-15	82.8%	Yes	ND
55-01	T	12	0	0.32	-15	82.8%	Yes	ND
61-01	T	16	0	0.28	-23	83.6%	Yes	ND
62-01	T	20	1	0.69	36	87.0%	No	NT
63-01	T	16	1	0.29	-34	93.0%	No	PD

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A)-
Due to insufficient Data (< 4 sampling events); Source/Tail (S/T)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Statistical Trend Analysis Summary

Project: Mission Ambassador - SZ1

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
06-01	T	16	16	3.9E-02	2.7E-02	No	I	I
07-03	T	16	10	2.5E-03	1.9E-03	No	I	I
17-02	T	16	16	5.6E-03	4.9E-03	No	S	S
18-02	T	16	15	2.4E-02	2.3E-02	No	NT	PI
21-02	T	19	19	1.8E-01	1.7E-01	No	D	D
23-03	S	19	16	5.6E+00	1.2E+00	No	NT	NT
29-02	T	16	1	5.0E-04	5.0E-04	No	S	PD
38-01	T	19	18	9.4E-03	9.1E-03	No	I	PI
53-01	T	19	0	7.6E-04	1.0E-03	Yes	ND	ND
54-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
55-01	T	12	5	1.1E-03	5.0E-04	No	PI	I
61-01	T	16	15	2.0E-03	1.9E-03	No	S	S
62-01	T	19	18	4.6E-02	3.8E-02	No	D	PD
63-01	T	16	16	3.6E-03	1.1E-03	No	NT	PD
TETRACHLOROETHYLENE(PCE)								
06-01	T	16	5	1.5E-03	5.0E-04	No	NT	NT
07-03	T	16	4	8.1E-04	5.0E-04	No	D	D
17-02	T	16	13	1.1E-02	1.3E-02	No	I	I
18-02	T	16	3	8.5E-04	6.4E-04	No	NT	NT
21-02	T	19	3	1.2E-02	5.0E-03	No	NT	D
23-03	S	19	0	3.7E-01	5.0E-02	Yes	ND	ND
29-02	T	16	7	8.2E-04	5.6E-04	No	I	I
38-01	T	19	19	1.8E-01	1.9E-01	No	D	S
53-01	T	19	19	6.3E-02	6.3E-02	No	PD	D
54-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
55-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
61-01	T	16	16	2.1E-02	2.1E-02	No	NT	PI
62-01	T	19	19	3.3E-01	3.0E-01	No	D	PD
63-01	T	16	16	3.9E-03	3.7E-03	No	NT	I
TRICHLOROETHYLENE (TCE)								
06-01	T	16	8	1.3E-03	8.5E-04	No	NT	PI
07-03	T	16	4	5.7E-04	5.0E-04	No	S	S
17-02	T	16	15	2.9E-03	3.1E-03	No	I	I

MAROS Statistical Trend Analysis Summary

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
TRICHLOROETHYLENE (TCE)								
18-02	T	16	3	1.1E-03	6.2E-04	No	NT	D
21-02	T	19	3	1.1E-02	5.0E-03	No	NT	D
23-03	S	19	1	3.8E-01	1.0E-01	No	NT	NT
29-02	T	16	7	9.8E-04	5.3E-04	No	I	I
38-01	T	19	19	2.3E-02	2.5E-02	No	NT	NT
53-01	T	19	8	7.9E-04	7.8E-04	No	S	S
54-01	T	12	1	5.1E-04	5.0E-04	No	S	PD
55-01	T	12	1	6.6E-04	5.0E-04	No	S	NT
61-01	T	16	16	5.9E-03	5.7E-03	No	S	S
62-01	T	19	18	4.5E-02	4.0E-02	No	D	S
63-01	T	16	16	8.6E-03	7.9E-03	No	D	D
VINYL CHLORIDE								
06-01	T	16	6	8.0E-04	5.0E-04	No	I	I
07-03	T	16	8	1.3E-03	6.8E-04	No	PI	PI
17-02	T	16	4	1.2E-03	5.0E-04	No	D	D
18-02	T	16	14	7.6E-03	7.0E-03	No	NT	PI
21-02	T	20	19	6.2E-02	4.8E-02	No	I	I
23-03	S	20	20	1.5E+01	9.9E+00	No	NT	NT
29-02	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
38-01	T	20	0	2.1E-03	1.3E-03	Yes	ND	ND
53-01	T	20	0	7.4E-04	7.5E-04	Yes	ND	ND
54-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
55-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
61-01	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
62-01	T	20	1	3.6E-03	5.0E-03	No	NT	I
63-01	T	16	1	5.3E-04	5.0E-04	No	PD	D

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Linear Regression Statistics Summary

Project: Mission Ambassador - SZ1

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Average Conc (mg/L)	Median Conc (mg/L)	Standard Deviation	All Samples "ND" ?	Ln Slope	Coefficient of Variation	Confidence in Trend	Concentration Trend
cis-1,2-DICHLOROETHYLENE									
06-01	T	3.9E-02	2.7E-02	4.2E-02	No	1.2E-03	1.08	100.0%	I
07-03	T	2.5E-03	1.9E-03	2.7E-03	No	6.2E-04	1.07	99.5%	I
17-02	T	5.6E-03	4.9E-03	3.7E-03	No	-9.1E-05	0.66	71.5%	S
18-02	T	2.4E-02	2.3E-02	1.8E-02	No	5.1E-04	0.74	94.1%	PI
21-02	T	1.8E-01	1.7E-01	8.5E-02	No	-2.5E-04	0.46	99.4%	D
23-03	S	5.6E+00	1.2E+00	9.1E+00	No	3.9E-04	1.62	75.8%	NT
29-02	T	5.0E-04	5.0E-04	1.5E-04	No	-1.1E-04	0.31	92.9%	PD
38-01	T	9.4E-03	9.1E-03	4.7E-03	No	2.0E-04	0.50	93.6%	PI
53-01	T	7.6E-04	1.0E-03	2.6E-04	Yes	7.7E-05	0.34	83.7%	ND
54-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
55-01	T	1.1E-03	5.0E-04	1.1E-03	No	4.3E-04	1.01	99.2%	I
61-01	T	2.0E-03	1.9E-03	1.0E-03	No	-1.1E-04	0.52	75.2%	S
62-01	T	4.6E-02	3.8E-02	2.8E-02	No	-2.5E-04	0.62	90.4%	PD
63-01	T	3.6E-03	1.1E-03	9.2E-03	No	-3.2E-04	2.58	91.6%	PD
TETRACHLOROETHYLENE(PCE)									
06-01	T	1.5E-03	5.0E-04	2.0E-03	No	-2.9E-04	1.28	88.2%	NT
07-03	T	8.1E-04	5.0E-04	7.6E-04	No	-3.4E-04	0.94	99.1%	D
17-02	T	1.1E-02	1.3E-02	7.2E-03	No	7.7E-04	0.64	99.5%	I
18-02	T	8.5E-04	6.4E-04	5.2E-04	No	6.2E-05	0.61	69.3%	NT
21-02	T	1.2E-02	5.0E-03	2.1E-02	No	-6.8E-04	1.81	99.2%	D
23-03	S	3.7E-01	5.0E-02	6.1E-01	Yes	5.3E-04	1.63	84.7%	ND
29-02	T	8.2E-04	5.6E-04	4.4E-04	No	3.0E-04	0.53	99.8%	I
38-01	T	1.8E-01	1.9E-01	7.0E-02	No	-9.5E-05	0.38	80.8%	S
53-01	T	6.3E-02	6.3E-02	1.1E-02	No	-6.7E-05	0.17	95.7%	D
54-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
55-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
61-01	T	2.1E-02	2.1E-02	8.7E-03	No	1.9E-04	0.43	94.2%	PI
62-01	T	3.3E-01	3.0E-01	2.1E-01	No	-2.4E-04	0.65	90.3%	PD
63-01	T	3.9E-03	3.7E-03	1.5E-03	No	6.7E-06	0.38	100.0%	I
TRICHLOROETHYLENE (TCE)									
06-01	T	1.3E-03	8.5E-04	1.1E-03	No	2.8E-04	0.85	92.9%	PI
07-03	T	5.7E-04	5.0E-04	2.4E-04	No	-4.0E-05	0.43	65.3%	S
17-02	T	2.9E-03	3.1E-03	1.4E-03	No	3.9E-04	0.47	99.3%	I
18-02	T	1.1E-03	6.2E-04	1.4E-03	No	-7.5E-06	1.23	100.0%	D
21-02	T	1.1E-02	5.0E-03	2.0E-02	No	-6.6E-04	1.80	99.1%	D
23-03	S	3.8E-01	1.0E-01	6.1E-01	No	4.6E-04	1.59	81.2%	NT
29-02	T	9.8E-04	5.3E-04	7.6E-04	No	3.2E-04	0.78	98.1%	I

Project: Mission Ambassador - SZ1

User Name: DLG

Location: Santa Barbara

State: California

Well	Source/ Tail	Average Conc (mg/L)	Median Conc (mg/L)	Standard Deviation	All Samples "ND" ?	Ln Slope	Coefficient of Variation	Confidence in Trend	Concentration Trend
TRICHLOROETHYLENE (TCE)									
38-01	T	2.3E-02	2.5E-02	7.7E-03	No	1.1E-04	0.33	83.9%	NT
53-01	T	7.9E-04	7.8E-04	2.0E-04	No	-1.3E-05	0.26	58.3%	S
54-01	T	5.1E-04	5.0E-04	1.8E-04	No	-1.1E-04	0.35	90.1%	PD
55-01	T	6.6E-04	5.0E-04	5.1E-04	No	7.7E-05	0.77	70.8%	NT
61-01	T	5.9E-03	5.7E-03	2.5E-03	No	-6.4E-05	0.43	68.4%	S
62-01	T	4.5E-02	4.0E-02	2.4E-02	No	-1.9E-04	0.55	84.8%	S
63-01	T	8.6E-03	7.9E-03	4.1E-03	No	-1.9E-04	0.47	99.4%	D
VINYL CHLORIDE									
06-01	T	8.0E-04	5.0E-04	5.5E-04	No	2.4E-04	0.69	96.0%	I
07-03	T	1.3E-03	6.8E-04	1.3E-03	No	3.1E-04	0.97	94.1%	PI
17-02	T	1.2E-03	5.0E-04	1.6E-03	No	-5.4E-04	1.39	99.7%	D
18-02	T	7.6E-03	7.0E-03	5.7E-03	No	4.4E-04	0.76	92.2%	PI
21-02	T	6.2E-02	4.8E-02	4.8E-02	No	3.4E-04	0.78	96.5%	I
23-03	S	1.5E+01	9.9E+00	1.5E+01	No	1.1E-04	1.00	63.5%	NT
29-02	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
38-01	T	2.1E-03	1.3E-03	1.7E-03	Yes	4.4E-05	0.83	58.8%	ND
53-01	T	7.4E-04	7.5E-04	2.7E-04	Yes	5.4E-05	0.37	72.1%	ND
54-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
55-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
61-01	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
62-01	T	3.6E-03	5.0E-03	2.5E-03	No	4.2E-04	0.69	98.1%	I
63-01	T	5.3E-04	5.0E-04	1.5E-04	No	-1.3E-04	0.29	97.2%	D

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Non-detect (ND); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); COV = Coefficient of Variation

MAROS Mann-Kendall Statistics Summary

Project: Mission Ambassador - SZ2

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Coefficient of Variation	Mann-Kendall Statistic	Confidence in Trend	All Samples "ND" ?	Concentration Trend
cis-1,2-DICHLOROETHYLENE								
05-01	T	12	0	0.32	-15	82.8%	Yes	ND
07-02	T	16	13	0.91	-38	95.2%	No	D
12-01	T	16	14	0.63	68	99.9%	No	I
13-01	S	18	18	2.18	-113	100.0%	No	D
16-01	T	12	0	0.32	-15	82.8%	Yes	ND
17-01	T	12	10	0.62	-25	95.0%	No	PD
21-01	T	19	19	0.76	-108	100.0%	No	D
29-01	T	16	0	0.28	-23	83.6%	Yes	ND
36-02	T	16	15	1.27	14	71.8%	No	NT
42-02	T	16	8	1.91	-38	95.2%	No	D
55-01	T	12	5	1.01	21	91.3%	No	PI
62-01	T	19	18	0.62	-59	97.9%	No	D
72-01	T	15	15	0.29	-5	57.7%	No	S
73-01	T	12	10	1.44	-19	88.9%	No	NT
TETRACHLOROETHYLENE(PCE)								
05-01	T	12	12	0.21	31	98.1%	No	I
07-02	T	16	8	1.48	59	99.7%	No	I
12-01	T	16	10	0.93	-63	99.8%	No	D
13-01	S	17	3	4.00	-40	94.6%	No	PD
16-01	T	12	12	0.29	40	99.7%	No	I
17-01	T	12	9	0.69	45	100.0%	No	I
21-01	T	18	5	1.68	-39	92.4%	No	PD
29-01	T	16	15	0.80	99	100.0%	No	I
36-02	T	16	15	1.93	-42	96.8%	No	D
42-02	T	16	1	0.74	38	95.2%	No	I
55-01	T	12	0	0.32	-15	82.8%	Yes	ND
62-01	T	19	19	0.65	-68	99.1%	No	D
72-01	T	15	4	0.87	-16	76.7%	No	S
73-01	T	12	0	0.75	23	93.3%	Yes	ND
TRICHLOROETHYLENE (TCE)								
05-01	T	12	10	0.18	2	52.7%	No	NT
07-02	T	16	10	0.74	42	96.8%	No	I
12-01	T	16	3	0.75	17	76.1%	No	NT
13-01	S	17	6	3.76	-86	100.0%	No	D
16-01	T	12	11	0.17	-28	96.9%	No	D
17-01	T	12	9	0.31	-2	52.7%	No	S

Project: Mission Ambassador - SZ2

User Name: DLG

Location: Santa Barbara

State: California

Well	Source/ Tail	Number of Samples	Number of Detects	Coefficient of Variation	Mann-Kendall Statistic	Confidence in Trend	All Samples "ND" ?	Concentration Trend
TRICHLOROETHYLENE (TCE)								
21-01	T	18	6	1.41	-13	67.3%	No	NT
29-01	T	16	3	0.29	-11	67.1%	No	S
36-02	T	16	16	1.32	-52	99.0%	No	D
42-02	T	16	6	1.31	38	95.2%	No	I
55-01	T	12	1	0.77	-4	58.0%	No	S
62-01	T	19	18	0.55	-56	97.3%	No	D
72-01	T	15	8	0.75	-28	90.8%	No	PD
73-01	T	12	3	0.67	9	70.4%	No	NT
VINYL CHLORIDE								
05-01	T	12	0	0.32	-15	82.8%	Yes	ND
07-02	T	16	2	0.28	-16	74.7%	No	S
12-01	T	16	4	0.25	-3	53.6%	No	S
13-01	S	19	19	0.94	-130	100.0%	No	D
16-01	T	12	0	0.32	-15	82.8%	Yes	ND
17-01	T	12	0	0.32	-15	82.8%	Yes	ND
21-01	T	20	20	1.36	55	96.0%	No	I
29-01	T	16	0	0.28	-23	83.6%	Yes	ND
36-02	T	16	4	0.74	-6	58.8%	No	S
42-02	T	16	16	0.95	-13	70.3%	No	S
55-01	T	12	0	0.32	-15	82.8%	Yes	ND
62-01	T	20	1	0.69	36	87.0%	No	NT
72-01	T	15	10	1.05	63	99.9%	No	I
73-01	T	12	6	1.26	-5	60.6%	No	NT

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A)-
Due to insufficient Data (< 4 sampling events); Source/Tail (S/T)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Statistical Trend Analysis Summary

Project: Mission Ambassador - SZ2

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
05-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
07-02	T	16	13	4.0E-03	2.8E-03	No	D	PD
12-01	T	16	14	5.6E-03	5.5E-03	No	I	I
13-01	S	18	18	4.0E-01	6.8E-02	No	D	D
16-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
17-01	T	12	10	1.8E-03	1.4E-03	No	PD	D
21-01	T	19	19	2.5E-01	1.9E-01	No	D	D
29-01	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
36-02	T	16	15	3.7E-02	2.3E-02	No	NT	NT
42-02	T	16	8	1.9E-02	5.0E-03	No	D	PD
55-01	T	12	5	1.1E-03	5.0E-04	No	PI	I
62-01	T	19	18	4.6E-02	3.8E-02	No	D	PD
72-01	T	15	15	3.2E-01	3.2E-01	No	S	NT
73-01	T	12	10	4.2E-02	7.7E-03	No	NT	PD
TETRACHLOROETHYLENE(PCE)								
05-01	T	12	12	1.4E-02	1.5E-02	No	I	I
07-02	T	16	8	3.0E-03	6.1E-04	No	I	I
12-01	T	16	10	2.4E-03	1.6E-03	No	D	D
13-01	S	17	3	1.0E-01	2.5E-03	No	PD	D
16-01	T	12	12	1.5E-02	1.6E-02	No	I	I
17-01	T	12	9	4.3E-03	4.2E-03	No	I	I
21-01	T	18	5	6.3E-03	2.6E-03	No	PD	PD
29-01	T	16	15	3.0E-03	2.6E-03	No	I	I
36-02	T	16	15	4.9E-02	1.3E-02	No	D	D
42-02	T	16	1	3.2E-03	3.8E-03	No	I	I
55-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
62-01	T	19	19	3.3E-01	3.0E-01	No	D	PD
72-01	T	15	4	7.4E-03	5.0E-03	No	S	NT
73-01	T	12	0	1.1E-03	7.5E-04	Yes	ND	ND
TRICHLOROETHYLENE (TCE)								
05-01	T	12	10	8.1E-04	8.3E-04	No	NT	NT
07-02	T	16	10	1.5E-03	1.1E-03	No	I	I
12-01	T	16	3	7.1E-04	5.0E-04	No	NT	I

MAROS Statistical Trend Analysis Summary

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
TRICHLOROETHYLENE (TCE)								
13-01	S	17	6	6.4E-02	2.5E-03	No	D	D
16-01	T	12	11	1.1E-03	1.2E-03	No	D	D
17-01	T	12	9	9.6E-04	9.7E-04	No	S	NT
21-01	T	18	6	5.4E-03	2.5E-03	No	NT	NT
29-01	T	16	3	5.2E-04	5.0E-04	No	S	S
36-02	T	16	16	2.9E-02	1.7E-02	No	D	D
42-02	T	16	6	4.3E-03	3.8E-03	No	I	I
55-01	T	12	1	6.6E-04	5.0E-04	No	S	NT
62-01	T	19	18	4.5E-02	4.0E-02	No	D	S
72-01	T	15	8	8.8E-03	5.0E-03	No	PD	S
73-01	T	12	3	1.2E-03	1.0E-03	No	NT	NT
VINYL CHLORIDE								
05-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
07-02	T	16	2	5.3E-04	5.0E-04	No	S	PD
12-01	T	16	4	5.5E-04	5.0E-04	No	S	S
13-01	S	19	19	6.4E-02	3.9E-02	No	D	D
16-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
17-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
21-01	T	20	20	4.4E-02	2.1E-02	No	I	I
29-01	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
36-02	T	16	4	1.4E-03	1.1E-03	No	S	S
42-02	T	16	16	1.2E-01	8.4E-02	No	S	NT
55-01	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
62-01	T	20	1	3.6E-03	5.0E-03	No	NT	I
72-01	T	15	10	8.6E-03	6.2E-03	No	I	I
73-01	T	12	6	9.3E-03	1.9E-03	No	NT	NT

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Linear Regression Statistics Summary

Project: Mission Ambassador - SZ2

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Average Conc (mg/L)	Median Conc (mg/L)	Standard Deviation	All Samples "ND" ?	Ln Slope	Coefficient of Variation	Confidence in Trend	Concentration Trend
cis-1,2-DICHLOROETHYLENE									
05-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
07-02	T	4.0E-03	2.8E-03	3.7E-03	No	-3.9E-04	0.91	91.3%	PD
12-01	T	5.6E-03	5.5E-03	3.5E-03	No	5.8E-04	0.63	99.6%	I
13-01	S	4.0E-01	6.8E-02	8.7E-01	No	-1.6E-03	2.18	100.0%	D
16-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
17-01	T	1.8E-03	1.4E-03	1.1E-03	No	-3.6E-04	0.62	98.5%	D
21-01	T	2.5E-01	1.9E-01	1.9E-01	No	-7.0E-04	0.76	100.0%	D
29-01	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
36-02	T	3.7E-02	2.3E-02	4.7E-02	No	4.3E-04	1.27	88.5%	NT
42-02	T	1.9E-02	5.0E-03	3.6E-02	No	-4.0E-04	1.91	90.4%	PD
55-01	T	1.1E-03	5.0E-04	1.1E-03	No	4.3E-04	1.01	99.2%	I
62-01	T	4.6E-02	3.8E-02	2.8E-02	No	-2.5E-04	0.62	90.4%	PD
72-01	T	3.2E-01	3.2E-01	9.1E-02	No	4.9E-05	0.29	72.4%	NT
73-01	T	4.2E-02	7.7E-03	6.1E-02	No	-9.9E-04	1.44	92.8%	PD
TETRACHLOROETHYLENE(PCE)									
05-01	T	1.4E-02	1.5E-02	3.0E-03	No	1.2E-04	0.21	98.3%	I
07-02	T	3.0E-03	6.1E-04	4.4E-03	No	9.1E-04	1.48	100.0%	I
12-01	T	2.4E-03	1.6E-03	2.2E-03	No	-7.9E-04	0.93	100.0%	D
13-01	S	1.0E-01	2.5E-03	4.1E-01	No	-8.2E-04	4.00	96.6%	D
16-01	T	1.5E-02	1.6E-02	4.3E-03	No	2.2E-04	0.29	99.9%	I
17-01	T	4.3E-03	4.2E-03	3.0E-03	No	7.1E-04	0.69	99.9%	I
21-01	T	6.3E-03	2.6E-03	1.1E-02	No	-4.1E-04	1.68	94.7%	PD
29-01	T	3.0E-03	2.6E-03	2.4E-03	No	7.0E-04	0.80	100.0%	I
36-02	T	4.9E-02	1.3E-02	9.5E-02	No	-7.9E-04	1.93	98.2%	D
42-02	T	3.2E-03	3.8E-03	2.3E-03	No	6.8E-04	0.74	99.7%	I
55-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
62-01	T	3.3E-01	3.0E-01	2.1E-01	No	-2.4E-04	0.65	90.3%	PD
72-01	T	7.4E-03	5.0E-03	6.4E-03	No	1.1E-04	0.87	64.5%	NT
73-01	T	1.1E-03	7.5E-04	8.6E-04	Yes	3.0E-04	0.75	89.0%	ND
TRICHLOROETHYLENE (TCE)									
05-01	T	8.1E-04	8.3E-04	1.4E-04	No	3.3E-05	0.18	73.4%	NT
07-02	T	1.5E-03	1.1E-03	1.1E-03	No	3.5E-04	0.74	97.3%	I
12-01	T	7.1E-04	5.0E-04	5.3E-04	No	2.2E-04	0.75	95.8%	I
13-01	S	6.4E-02	2.5E-03	2.4E-01	No	-1.2E-03	3.76	99.9%	D
16-01	T	1.1E-03	1.2E-03	2.0E-04	No	-9.3E-05	0.17	98.5%	D
17-01	T	9.6E-04	9.7E-04	3.0E-04	No	2.2E-05	0.31	59.1%	NT
21-01	T	5.4E-03	2.5E-03	7.5E-03	No	-2.0E-04	1.41	80.0%	NT

Project: Mission Ambassador - SZ2

User Name: DLG

Location: Santa Barbara

State: California

Well	Source/ Tail	Average Conc (mg/L)	Median Conc (mg/L)	Standard Deviation	All Samples "ND" ?	Ln Slope	Coefficient of Variation	Confidence in Trend	Concentration Trend
TRICHLOROETHYLENE (TCE)									
29-01	T	5.2E-04	5.0E-04	1.5E-04	No	-5.3E-05	0.29	78.3%	S
36-02	T	2.9E-02	1.7E-02	3.9E-02	No	-5.9E-04	1.32	98.8%	D
42-02	T	4.3E-03	3.8E-03	5.6E-03	No	5.6E-04	1.31	98.4%	I
55-01	T	6.6E-04	5.0E-04	5.1E-04	No	7.7E-05	0.77	70.8%	NT
62-01	T	4.5E-02	4.0E-02	2.4E-02	No	-1.9E-04	0.55	84.8%	S
72-01	T	8.8E-03	5.0E-03	6.6E-03	No	-2.1E-04	0.75	80.9%	S
73-01	T	1.2E-03	1.0E-03	8.2E-04	No	1.7E-04	0.67	76.1%	NT
VINYL CHLORIDE									
05-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
07-02	T	5.3E-04	5.0E-04	1.4E-04	No	-9.6E-05	0.28	93.2%	PD
12-01	T	5.5E-04	5.0E-04	1.3E-04	No	-4.2E-05	0.25	80.0%	S
13-01	S	6.4E-02	3.9E-02	6.0E-02	No	-9.4E-04	0.94	100.0%	D
16-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
17-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
21-01	T	4.4E-02	2.1E-02	6.0E-02	No	5.7E-04	1.36	96.8%	I
29-01	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
36-02	T	1.4E-03	1.1E-03	1.0E-03	No	-9.6E-05	0.74	68.5%	S
42-02	T	1.2E-01	8.4E-02	1.2E-01	No	3.6E-05	0.95	55.9%	NT
55-01	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
62-01	T	3.6E-03	5.0E-03	2.5E-03	No	4.2E-04	0.69	98.1%	I
72-01	T	8.6E-03	6.2E-03	9.0E-03	No	1.0E-03	1.05	100.0%	I
73-01	T	9.3E-03	1.9E-03	1.2E-02	No	-3.4E-04	1.26	71.1%	NT

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Non-detect (ND); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); COV = Coefficient of Variation

MAROS Mann-Kendall Statistics Summary

Project: Mission Ambassador - SZ3

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Coefficient of Variation	Mann-Kendall Statistic	Confidence in Trend	All Samples "ND" ?	Concentration Trend
cis-1,2-DICHLOROETHYLENE								
07-01	T	16	13	0.73	18	77.5%	No	NT
16-03	T	12	0	0.32	-15	82.8%	Yes	ND
18-03	S	16	14	1.49	4	55.3%	No	NT
19-03	T	12	0	0.32	-15	82.8%	Yes	ND
21-03	T	18	1	0.63	79	99.9%	No	I
23-02	T	16	16	1.47	-25	85.7%	No	NT
29-03	T	10	0	0.29	-9	75.8%	Yes	ND
41-02	T	12	0	0.32	-15	82.8%	Yes	ND
42-03	T	16	1	0.28	-10	65.5%	No	S
56-01	T	16	7	2.19	74	100.0%	No	I
TETRACHLOROETHYLENE(PCE)								
07-01	T	16	5	1.71	-4	55.3%	No	NT
16-03	T	12	12	0.11	11	74.9%	No	NT
18-03	S	16	5	2.64	-68	99.9%	No	D
19-03	T	12	12	0.88	64	100.0%	No	I
21-03	T	19	19	0.19	58	97.7%	No	I
23-02	T	16	15	0.51	40	96.1%	No	I
29-03	T	10	9	0.59	32	99.9%	No	I
41-02	T	12	12	0.18	23	93.3%	No	PI
42-03	T	16	16	0.14	4	55.3%	No	NT
56-01	T	16	16	0.38	-80	100.0%	No	D
TRICHLOROETHYLENE (TCE)								
07-01	T	16	5	1.22	4	55.3%	No	NT
16-03	T	12	2	0.27	-8	68.1%	No	S
18-03	S	16	4	3.88	-55	99.3%	No	D
19-03	T	12	1	0.35	-16	84.5%	No	S
21-03	T	18	10	0.55	116	100.0%	No	I
23-02	T	16	11	0.79	36	94.2%	No	PI
29-03	T	10	0	0.29	-9	75.8%	Yes	ND
41-02	T	12	12	0.20	7	65.6%	No	NT
42-03	T	16	0	0.28	-23	83.6%	Yes	ND
56-01	T	16	9	0.80	82	100.0%	No	I
VINYL CHLORIDE								
07-01	T	16	1	0.29	-24	84.7%	No	S
16-03	T	12	0	0.32	-15	82.8%	Yes	ND

Project: Mission Ambassador - SZ3

User Name: DLG

Location: Santa Barbara

State: California

Well	Source/ Tail	Number of Samples	Number of Detects	Coefficient of Variation	Mann-Kendall Statistic	Confidence in Trend	All Samples "ND" ?	Concentration Trend
VINYL CHLORIDE								
18-03	S	16	10	0.95	44	97.4%	No	I
19-03	T	12	0	0.32	-15	82.8%	Yes	ND
21-03	T	19	0	0.63	80	99.8%	Yes	ND
23-02	T	16	10	1.91	-18	77.5%	No	NT
29-03	T	10	0	0.29	-9	75.8%	Yes	ND
41-02	T	12	0	0.32	-15	82.8%	Yes	ND
42-03	T	16	0	0.28	-23	83.6%	Yes	ND
56-01	T	16	0	0.37	33	92.4%	Yes	ND

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A)-
Due to insufficient Data (< 4 sampling events); Source/Tail (S/T)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Statistical Trend Analysis Summary

Project: Mission Ambassador - SZ3

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
07-01	T	16	13	2.7E-03	2.0E-03	No	NT	NT
16-03	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
18-03	S	16	14	9.0E-03	2.1E-03	No	NT	NT
19-03	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
21-03	T	18	1	1.4E-03	1.0E-03	No	I	I
23-02	T	16	16	1.5E-02	4.1E-03	No	NT	NT
29-03	T	10	0	5.5E-04	5.0E-04	Yes	ND	ND
41-02	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
42-03	T	16	1	5.3E-04	5.0E-04	No	S	S
56-01	T	16	7	3.9E-03	1.0E-03	No	I	I
TETRACHLOROETHYLENE(PCE)								
07-01	T	16	5	3.4E-03	5.0E-04	No	NT	NT
16-03	T	12	12	2.5E-02	2.4E-02	No	NT	NT
18-03	S	16	5	4.6E-02	5.0E-04	No	D	D
19-03	T	12	12	7.8E-03	3.9E-03	No	I	I
21-03	T	19	19	8.7E-02	8.4E-02	No	I	I
23-02	T	16	15	5.1E-02	5.3E-02	No	I	NT
29-03	T	10	9	1.9E-03	1.9E-03	No	I	I
41-02	T	12	12	1.2E-02	1.2E-02	No	PI	PI
42-03	T	16	16	3.7E-02	3.8E-02	No	NT	I
56-01	T	16	16	7.5E-02	8.5E-02	No	D	D
TRICHLOROETHYLENE (TCE)								
07-01	T	16	5	1.2E-03	5.0E-04	No	NT	NT
16-03	T	12	2	5.5E-04	5.0E-04	No	S	S
18-03	S	16	4	2.3E-02	5.0E-04	No	D	D
19-03	T	12	1	5.1E-04	5.0E-04	No	S	PD
21-03	T	18	10	1.6E-03	1.7E-03	No	I	I
23-02	T	16	11	2.9E-03	2.3E-03	No	PI	I
29-03	T	10	0	5.5E-04	5.0E-04	Yes	ND	ND
41-02	T	12	12	1.7E-03	1.7E-03	No	NT	I
42-03	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
56-01	T	16	9	2.2E-03	2.0E-03	No	I	I

MAROS Statistical Trend Analysis Summary

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
VINYL CHLORIDE								
VINYL CHLORIDE								
07-01	T	16	1	5.1E-04	5.0E-04	No	S	PD
16-03	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
18-03	S	16	10	1.6E-03	8.9E-04	No	I	I
19-03	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
21-03	T	19	0	1.3E-03	1.0E-03	Yes	ND	ND
23-02	T	16	10	4.9E-03	1.7E-03	No	NT	NT
29-03	T	10	0	5.5E-04	5.0E-04	Yes	ND	ND
41-02	T	12	0	5.2E-04	5.0E-04	Yes	ND	ND
42-03	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
56-01	T	16	0	7.7E-04	1.0E-03	Yes	ND	ND

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Linear Regression Statistics Summary

Project: Mission Ambassador - SZ3

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Average Conc (mg/L)	Median Conc (mg/L)	Standard Deviation	All Samples "ND" ?	Ln Slope	Coefficient of Variation	Confidence in Trend	Concentration Trend
cis-1,2-DICHLOROETHYLENE									
07-01	T	2.7E-03	2.0E-03	2.0E-03	No	1.8E-04	0.73	80.1%	NT
16-03	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
18-03	S	9.0E-03	2.1E-03	1.3E-02	No	3.2E-04	1.49	79.4%	NT
19-03	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
21-03	T	1.4E-03	1.0E-03	8.7E-04	No	4.7E-04	0.63	100.0%	I
23-02	T	1.5E-02	4.1E-03	2.1E-02	No	-2.6E-04	1.47	80.8%	NT
29-03	T	5.5E-04	5.0E-04	1.6E-04	Yes	-6.8E-05	0.29	87.0%	ND
41-02	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
42-03	T	5.3E-04	5.0E-04	1.5E-04	No	-6.5E-05	0.28	83.2%	S
56-01	T	3.9E-03	1.0E-03	8.5E-03	No	9.6E-04	2.19	100.0%	I
TETRACHLOROETHYLENE(PCE)									
07-01	T	3.4E-03	5.0E-04	5.8E-03	No	4.3E-04	1.71	88.9%	NT
16-03	T	2.5E-02	2.4E-02	2.8E-03	No	2.9E-05	0.11	84.5%	NT
18-03	S	4.6E-02	5.0E-04	1.2E-01	No	-1.4E-03	2.64	99.6%	D
19-03	T	7.8E-03	3.9E-03	6.9E-03	No	8.0E-04	0.88	100.0%	I
21-03	T	8.7E-02	8.4E-02	1.7E-02	No	9.5E-05	0.19	99.1%	I
23-02	T	5.1E-02	5.3E-02	2.6E-02	No	3.5E-04	0.51	88.6%	NT
29-03	T	1.9E-03	1.9E-03	1.1E-03	No	4.7E-04	0.59	99.9%	I
41-02	T	1.2E-02	1.2E-02	2.2E-03	No	6.5E-05	0.18	91.0%	PI
42-03	T	3.7E-02	3.8E-02	5.1E-03	No	6.8E-06	0.14	100.0%	I
56-01	T	7.5E-02	8.5E-02	2.9E-02	No	-4.8E-04	0.38	99.6%	D
TRICHLOROETHYLENE (TCE)									
07-01	T	1.2E-03	5.0E-04	1.4E-03	No	9.5E-05	1.22	67.3%	NT
16-03	T	5.5E-04	5.0E-04	1.5E-04	No	-5.8E-05	0.27	84.7%	S
18-03	S	2.3E-02	5.0E-04	9.0E-02	No	-8.3E-04	3.88	97.9%	D
19-03	T	5.1E-04	5.0E-04	1.8E-04	No	-1.1E-04	0.35	90.1%	PD
21-03	T	1.6E-03	1.7E-03	9.0E-04	No	5.0E-04	0.55	100.0%	I
23-02	T	2.9E-03	2.3E-03	2.3E-03	No	4.5E-04	0.79	97.7%	I
29-03	T	5.5E-04	5.0E-04	1.6E-04	Yes	-6.8E-05	0.29	87.0%	ND
41-02	T	1.7E-03	1.7E-03	3.3E-04	No	5.7E-06	0.20	100.0%	I
42-03	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
56-01	T	2.2E-03	2.0E-03	1.8E-03	No	7.8E-04	0.80	100.0%	I
VINYL CHLORIDE									
07-01	T	5.1E-04	5.0E-04	1.5E-04	No	-9.9E-05	0.29	93.1%	PD
16-03	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
18-03	S	1.6E-03	8.9E-04	1.5E-03	No	4.8E-04	0.95	99.4%	I

Project: Mission Ambassador - SZ3

User Name: DLG

Location: Santa Barbara

State: California

Well	Source/ Tail	Average Conc (mg/L)	Median Conc (mg/L)	Standard Deviation	All Samples "ND" ?	Ln Slope	Coefficient of Variation	Confidence in Trend	Concentration Trend
VINYL CHLORIDE									
19-03	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
21-03	T	1.3E-03	1.0E-03	8.5E-04	Yes	4.2E-04	0.63	99.9%	ND
23-02	T	4.9E-03	1.7E-03	9.4E-03	No	-2.2E-04	1.91	77.0%	NT
29-03	T	5.5E-04	5.0E-04	1.6E-04	Yes	-6.8E-05	0.29	87.0%	ND
41-02	T	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
42-03	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
56-01	T	7.7E-04	1.0E-03	2.8E-04	Yes	1.4E-04	0.37	89.5%	ND

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Non-detect (ND); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); COV = Coefficient of Variation

MAROS Mann-Kendall Statistics Summary

Project: Mission Ambassador - SZ4

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Coefficient of Variation	Mann-Kendall Statistic	Confidence in Trend	All Samples "ND" ?	Concentration Trend
cis-1,2-DICHLOROETHYLENE								
06-03	T	16	0	0.28	-23	83.6%	Yes	ND
15-03	S	12	0	0.32	-15	82.8%	Yes	ND
36-04	T	16	0	0.34	-15	73.3%	Yes	ND
TETRACHLOROETHYLENE(PCE)								
06-03	T	16	16	0.22	78	100.0%	No	I
15-03	S	12	12	0.27	40	99.7%	No	I
36-04	T	16	16	0.13	8	62.2%	No	NT
TRICHLOROETHYLENE (TCE)								
06-03	T	16	14	0.24	-55	99.3%	No	D
15-03	S	12	0	0.32	-15	82.8%	Yes	ND
36-04	T	16	0	0.34	-15	73.3%	Yes	ND
VINYL CHLORIDE								
06-03	T	16	0	0.28	-23	83.6%	Yes	ND
15-03	S	12	0	0.32	-15	82.8%	Yes	ND
36-04	T	16	0	0.34	-15	73.3%	Yes	ND

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A)-
Due to insufficient Data (< 4 sampling events); Source/Tail (S/T)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Statistical Trend Analysis Summary

Project: Mission Ambassador - SZ4

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
06-03	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
15-03	S	12	0	5.2E-04	5.0E-04	Yes	ND	ND
36-04	T	16	0	5.5E-04	5.0E-04	Yes	ND	ND
TETRACHLOROETHYLENE(PCE)								
06-03	T	16	16	1.6E-02	1.6E-02	No	I	I
15-03	S	12	12	2.7E-02	2.7E-02	No	I	I
36-04	T	16	16	3.8E-02	3.9E-02	No	NT	NT
TRICHLOROETHYLENE (TCE)								
06-03	T	16	14	9.1E-04	9.8E-04	No	D	D
15-03	S	12	0	5.2E-04	5.0E-04	Yes	ND	ND
36-04	T	16	0	5.5E-04	5.0E-04	Yes	ND	ND
VINYL CHLORIDE								
06-03	T	16	0	5.2E-04	5.0E-04	Yes	ND	ND
15-03	S	12	0	5.2E-04	5.0E-04	Yes	ND	ND
36-04	T	16	0	5.5E-04	5.0E-04	Yes	ND	ND

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Linear Regression Statistics Summary

Project: Mission Ambassador - SZ4

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 1/1/2016 to 1/1/2026

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Average Conc (mg/L)	Median Conc (mg/L)	Standard Deviation	All Samples "ND" ?	Ln Slope	Coefficient of Variation	Confidence in Trend	Concentration Trend
cis-1,2-DICHLOROETHYLENE									
06-03	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
15-03	S	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
36-04	T	5.5E-04	5.0E-04	1.9E-04	Yes	-7.8E-05	0.34	84.0%	ND
TETRACHLOROETHYLENE(PCE)									
06-03	T	1.6E-02	1.6E-02	3.3E-03	No	1.7E-04	0.22	100.0%	I
15-03	S	2.7E-02	2.7E-02	7.4E-03	No	1.7E-04	0.27	99.6%	I
36-04	T	3.8E-02	3.9E-02	5.1E-03	No	1.5E-05	0.13	66.9%	NT
TRICHLOROETHYLENE (TCE)									
06-03	T	9.1E-04	9.8E-04	2.2E-04	No	-1.6E-04	0.24	99.7%	D
15-03	S	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
36-04	T	5.5E-04	5.0E-04	1.9E-04	Yes	-7.8E-05	0.34	84.0%	ND
VINYL CHLORIDE									
06-03	T	5.2E-04	5.0E-04	1.4E-04	Yes	-1.0E-04	0.28	94.4%	ND
15-03	S	5.2E-04	5.0E-04	1.7E-04	Yes	-1.1E-04	0.32	91.6%	ND
36-04	T	5.5E-04	5.0E-04	1.9E-04	Yes	-7.8E-05	0.34	84.0%	ND

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Non-detect (ND); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); COV = Coefficient of Variation

EXHIBIT 5

Technical Memorandum



August 18, 2026

Jan Greben
Price, Postel & Parma, LLP
200 East Carrillo Street, Suite 400
Santa Barbara, California 93101

RE: PCE Impacts in Groundwater Known to and Accepted by the Central Coast Regional Water Board in the Vicinity of the Former Mission Linen Supply Ambassador Laundry Site, 201 East Haley Street, Santa Barbara, CA

Mr. Greben:

In support of the Petition being filed by Price, Postel & Parma, LLP on behalf of Mission Linen Supply (Mission), Environmental Risk Solutions, Inc. (ERS) has prepared this Technical Memorandum (Tech Memo) regarding the above-referenced subject. This Tech Memo is intended to remind the Central Coast Regional Water Board (Water Board) of the prior ERS submittal dated May 3, 2013, on this same subject, which was posted on Geotracker at that time and was also appended to the Apex Companies, LLC, Low-Threat Closure Evaluation and Off-Site NFA Request submittal to the Water Board on January 13, 2026 (Apex LTC Submittal) associated with the above referenced property (Mission site). The Water Board seems to have overlooked the 2013 ERS submittal and its relevance in their review of the Apex LTC Submittal. All information presented in this Tech Memo is available on the Water Board Geotracker website.

The Water Board closed numerous solvent-impacted and Leaking Underground Storage Tank (LUST) sites with tetrachloroethene (PCE) and other volatile organic compound (VOC) concentrations ranging from about 20 micrograms per liter (ug/L) to more than 100 ug/L between about 1990 and 2010 that are in the immediate vicinity and in the nearby downtown area relative to the Mission site. Based on these site closures by the Water Board, these PCE concentrations represent background conditions that are known to and have been acceptable to the Water Board. An ATC Associates, Inc. (ATC) report prepared in 2002 references "City-wide PCE impacted groundwater" and Water Board correspondence from 1996 references "regional groundwater contamination." Find the following examples of PCE impacts at sites closed by the Water Board or known PCE impacts that have not been addressed by the Water Board.

- The Water Board closed the former Tidewater Marine facility at 104 East Haley Street in 1996 with **510 ug/L of PCE in groundwater** and attributed it to regional contamination with no further investigation despite referencing that a solvent parts washer was located on this property. This site is located ~400 feet up- to- cross gradient relative to the Mission site.

Technical Memorandum



- The Water Board closed the Paseo Nuevo Mall (651 Paseo Nuevo at State Street) in 2002 with **more than 100 ug/L of PCE in groundwater** in two on-site monitoring wells with limited sampling in 1988 and 1989 that was attributed to off-site sources. This site is located ~1,500 feet up-gradient of the Mission site.
- The Water Board closed the 401 Santa Barbara Street LUST site in 1990 with **79 ug/L of PCE in groundwater**. This site is located ~300 feet cross-gradient from the Mission site.
- The Water Board closed the former GTE site located at 221 E. Gutierrez Street in 2001 with **49 ug/L of PCE in groundwater**. This site is located ~300 feet cross-gradient of the Mission site.
- The Water Board closed the Sanchez Property LUST site located at 526 Anacapa Street in 2010 with **21 ug/L of PCE in groundwater**. This site is located ~400 feet upgradient of the Mission site.
- The 2002 ATC report related to the Paseo Nuevo Mall development project, in an effort to support their statement of “City-wide PCE impacted groundwater” identified **15 sites with PCE concentrations in groundwater above 18 ug/L** on a list of 60 sites with known or potential VOC contamination in the vicinity of the Mission site and nearby areas. These PCE and VOC sites are more examples that can be added to the list above.
- It’s not clear whether the Water Board ever followed up on investigating the Star Rug Cleaners site located at 26 E. Cota Street and the adjacent parking lot on Anacapa Street where Star Rug was observed illegally discharging liquid waste into a planter in 1994. The site is located ~400 feet upgradient of the Mission site.
- As stated in the Apex LTC Submittal there is “clear evidence of an **upgradient, off-Site unknown source that has been contributing PCE to SZ3 groundwater beneath the Site since the early 1990s ranging from 16 to 24 ug/L** based on data at SZ-3 well 41-02 located at Vera Cruz Park.” This is additional evidence of the PCE background levels that have been acceptable to the Water Board dating back to the 1990s.

Mission has reduced PCE levels in Shallow Zone 1 and 2 groundwater to 17 ug/L (see Section 4.2.1.2.1 of Apex LTC submittal) that is well below the PCE background conditions for this area established by prior Water Board closure determinations and unknown sources. Shallow Zone 3 groundwater has a maximum concentration of 99 ug/L of PCE based on the most recent data and a portion of that can be attributed to the unknown upgradient off-site source noted above. Shallow Zone 4 has a maximum concentration of 32 ug/L of PCE and Shallow Zone 5 and the Upper Producing Zone have been reduced to below the MCL. The Water Board needs to either issue an off-site no further action determination to Mission and approve destruction of all monitoring wells proposed in the Apex LTC Submittal or reopen and investigate numerous closed sites with PCE and VOC levels much higher than can be attributed to the Mission site.

Technical Memorandum



The Water Board July 22, 2026, response letter fails to recognize the PCE and VOC background conditions highlighted by ERS in 2013 and again in this Tech Memo that have been approved and accepted by the Water Board in the vicinity of the Mission site with all of this information readily available on their own Geotracker database. This includes the nearby 104 East Haley property where the Water Board apparently “closed their eyes” in 1996 with more than 500 ug/L in groundwater while acknowledging data gaps and a chlorinated solvent parts degreaser at that location and at the same time pointing to “regional groundwater contamination.” When this property was highlighted again by ERS in 2013, the Water Board continued their inaction with respect to this property and the others highlighted in this Tech Memo. The Water Board is not being equitable with their past closure determinations or acknowledging the existing PCE background concentrations in groundwater from both known and unknown sources that they have accepted at numerous other sites.

Please contact me with any questions at 415-310-0656 or dmoore@cleanfinancials.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. W. Moore', written in a cursive style.



Donald W. Moore, PG, ARM
Principal

cc: Tony Mancuso, Mission
Lina Somait, Price, Postel & Parma, LLP
Erik Mathison, Price, Postel & Parma, LLP
Erik Harz, Apex

EXHIBIT 6



Technical Memorandum

To: Jan Greben, Price, Postel & Parma LLP

From: Erik Harz, PG, Apex Companies, LLC
Daniel Grasmick, PE, Apex Companies, LLC

CC: Tony Mancuso, Mission Linen Supply
Don Moore, PG, Environmental Risk Solutions
Erik Mathison, Price Postel & Parma LLP
Lina Somait, Price Postel & Parma LLP

Date: August 18, 2026

Re: **Apex Response to Water Board Response to Low-Threat Closure Evaluation and Off-Site No Further Action Request with Requirements for Well Destruction Work Plan and On-Site Feasibility Study**

This Technical Memorandum (Tech Memo) is submitted in support of the State Water Resources Control Board's requirement that a Water Quality Petition includes a statement describing the reasons the Central Coast Regional Water Quality Control Board (Water Board) action or inaction was inappropriate or improper.

The Water Board responded to Apex's *Low-Threat Closure Evaluation and Off-Site No Further Action Request* dated January 13, 2026 (Closure Evaluation) on July 22, 2026. The Apex Closure Evaluation was related to the former Mission Ambassador Laundry Facility, located at 201 East Haley Street, Santa Barbara, California (the Site) which is owned by Mission Linen Supply (Mission). The following three documents were issued by the Water Board in response to the Closure Evaluation:

1. *Response to Low-Threat Closure Evaluation and Off-Site No Further Action Request with Requirements For Well Destruction Work Plan and On-Site Feasibility Study*, dated July 22, 2026 (Closure Evaluation Response Letter)
2. *Transmittal of Revised Monitoring and Reporting Program Order R3-2008-0027*, dated July 22, 2026 (2026 MRP Cover Letter)
3. *Monitoring and Reporting Program Order R3-2008-0027*, dated July 22, 2026 (2026 MRP)

A summary of the portions of the Water Board's Closure Evaluation Response Letter that are improper and disputed by Apex are provided below.

Garden Street VOC Impacts

Apex disagrees with the Water Board's assertion that Mission is responsible for volatile organic compound (VOC) impacts along Garden Street. Apex's position regarding the Garden Street VOC impacts is clearly stated in Section 3.3 of Closure Evaluation as follows:

"Potential Mission-related PCE impacts at well 62-01 prior to the sewer-related spikes in VOC concentrations that started in 2015 ranged from about 10 to 30 µg/L. Based on the overwhelming non-Mission VOCs impacts that have impacted that location over the past 10 years in conjunction with the preferential pathway utility corridor, it is unclear if any Mission-related impacts remain in that area. There is no evidence that suggests any of the PCE impacts at wells 53-01 and 38-01 were ever related to Mission as they are well out of the SZ1 flow path from the former Mission source area that is well established. Further, these wells are located north and adjacent to the heavily damaged sewer lines and preferential pathway utility corridor that is at least 12 feet in depth that intercepts the upper half of SZ1. In the absence of the sewer-related discharges, if any Mission-related PCE still remained in the 10 to 30 µg/L range at well 62-01, those levels would meet the RWQCB LTC criteria."

The Water Board has not disputed the technical positions established by Apex and the Mission team presented to the Water Board over the past five years. The Closure Evaluation (Section 3.1 and Figure 5) suggests the following are potential responsible parties associated with Garden Street VOC / PCE impacts.

1. **City of Santa Barbara** for their damaged sewer lines that have distributed and exacerbated VOC contamination along the Garden Street utility corridor. The City's 2018 inspection revealed five heavily damaged portions of the sewer on the one block section between E. Cota and E. Haley Streets. As highlighted in Apex's presentations and technical responses, and as documented in the Water Board guidance document *"Dry Cleaners-A major source of PCE in Groundwater"* dated March 27, 1992, damaged sewers are identified as a VOC release mechanism. This is a common situation throughout California and municipalities across the State have been held liable for sewer-related contamination. The City's sewer issues are well documented (Channelkeeper-City litigation settlement, see PDF pages 91-92 of the Closure Evaluation). We understand from correspondence between the Water Board and City that the sewer line along this section of Garden Street remains unrepaired¹, and along with the entire utility corridor, continues to act as potential source and preferential pathway for VOC impacts along Garden Street.
2. **Numerous Up-Sewer Flow Dischargers** with current and historical solvent use that could have discharged PCE and VOCs into the City's damaged sewer system. Given the known VOC impacts that are unrelated to Mission, this is consistent with what appears to have occurred. The Closure Evaluation highlights a number of these potential PCE sources on Figure 5, but an exhaustive search is the responsibility of the Water Board and City.

Given that other parties responsible for VOCs along the Garden Street utility corridor have been identified, Apex questions the basis for the Water Board requiring Mission to be responsible for continued monitoring and / or remediation when Apex has demonstrated that these VOCs appear to be unrelated to Mission.

¹ As summarized in correspondence between the City of Santa Barbara and the Water Board documenting the approach for repairs to the Garden Street sewer line in the vicinity of the Site available on Geotracker:
https://documents.geotracker.waterboards.ca.gov/regulators/deliverable_documents/1202527701/City%20of%20SB%202026%20Sewer%20Repair%20Info.pdf

Water Board Did Not Conduct a Comprehensive Evaluation in accordance with the Water Board LTC Guidance

Apex's Closure Evaluation evaluated the environmental conditions at the Site relative to the Regional Water Quality Control Board's (RWQCB) *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites* (RWQCB – San Francisco Bay Region, July 31, 2009) (Low-Threat Closure [LTC] Guidance; see Executive Summary of Apex Closure Evaluation) to determine whether the Site met the criteria for low-threat closure. Low-threat closure is defined in the LTC Guidance as “*criteria for evaluating if and when chlorinated solvent sites that pose little threat to human and ecological health, water quality, and beneficial uses but do not yet meet cleanup standards at all locations, could be closed*”. As such, an LTC evaluation involves assessing multiple lines of evidence focused on risk to receptors (in this case, humans via vapor intrusion and drinking water pathways) following nine narrative criteria, rather than comparing results to specific concentrations or numeric cleanup levels (see Section 4.0 of Apex submittal). A summary of the nine narrative criteria is summarized in the table below:

Table ES-1 Recommended Closure Criteria¹ for Low-Threat Chlorinated Solvent Sites

1. Develop a complete Conceptual Site Model (CSM) <i>1a) Pollutant sources are identified and evaluated</i> <i>1b) The site is adequately characterized</i> <i>1c) Exposure pathways, receptors, and potential risks, threats, and other environmental concerns are identified and assessed</i>
2. Control sources and mitigate risks and threats <i>2a) Pollutant sources are remediated to the extent feasible</i> <i>2b) Unacceptable risks to human health, ecological health, and sensitive receptors, considering current and future land and water uses, are mitigated</i> <i>2c) Unacceptable threats to groundwater and surface water resources, considering existing and potential beneficial uses, are mitigated</i>
3. Demonstrate that residual pollution in all media will not adversely affect present and anticipated land and water uses <i>3a) Groundwater plumes are decreasing</i> <i>3b) Cleanup standards can be met within a reasonable timeframe</i> <i>3c) Risk management measures are appropriate, documented, and do not require future Water Board oversight</i>

¹ Closure criteria are intended to facilitate the decision-making process and not circumvent best professional judgment.

The Water Board's Closure Evaluation Response Letter did not fully evaluate the Site in accordance with LTC Guidance. The Water Board only focused on a single line of evidence based on Criteria 3a (MAROS statistical analysis, see Section 4.3.1 / Table 3 of the Closure Evaluation). This was used as the Water Board's singular basis for denying Mission's request to destroy the majority of the groundwater monitoring well network. Further,

the Water Board is requiring Mission to continue monitoring and sampling 25 groundwater monitoring wells (28 total wells in the 2026 MRP which were shown to satisfy LTC criteria in Apex's Closure Evaluation. No Water Board comments were provided on the other eight narrative criteria for Site closure in their LTC Guidance which was improper.

The focus of the statistical analysis in the Closure Evaluation was on the residual plume behavior post-remediation under natural attenuation conditions. Looking at the entire dataset and the overall statistical trends, the plume is collapsing as a result of 35 years of Water Board-approved remedial actions. A limited number of non-decreasing trends at individual wells represent isolated areas of residual impacts that were unable to be treated largely based on access restrictions. As shown in the Closure Evaluation, these residual impacts do not pose a risk to human health or water resources and meet the LTC criteria. It is imperative for the Water Board to assess the plume and Site conditions based on all of the nine Water Board LTC criteria and not just statistical trends.

The Water Board's response places substantial weight on the statistical analysis performed in support of Criteria 3a, while failing to consider to the broader body of evidence supporting the conceptual site model, source control and a range of remedial actions, plume stability and the entire groundwater dataset, mitigation of risks to human receptors and the conclusion that residual VOC impacts pose no unacceptable risk to current or reasonably anticipated future land or water uses. Focusing on just this one line of evidence and not considering the limited dataset is technically improper.

As highlighted above, relying only on these statistical trends is further concerning because:

1. The MAROS summary includes caveats that were not addressed in the Water Board's Closure Evaluation Response Letter, including the statement that: *"As shown in Table 3, some of the well locations evaluated are flagged with 'Probably Increasing' or 'Increasing' trends; however, these increases are largely related to dechlorination or have low detections, many of which are below the MCL."* Additionally, Table 3 caveats many of the increasing trends with narrative statements that did not appear to be considered by the Water Board in the Closure Evaluation Response Letter.
2. The MAROS analysis was a line of evidence conducted over a limited timeframe (2016 to present), following completion of groundwater remedial actions to assess plume stability following remediation. Therefore, the analysis did not capture the significant PCE / VOC reductions realized based on Mission's multiple phases of remediation from 1988 through 2014.

The existence of potentially increasing and/or no trend conditions coupled with low overall concentrations or low concentrations relative to their maximum does not necessarily justify denial of cessation of groundwater monitoring and destruction of the groundwater monitoring well network. To reiterate, contaminant migration is limited, exposure pathways are incomplete, and residual contamination does not pose an unacceptable risk.

We have provided the following, based on data existing in numerous technical reports available on Geotracker, to supplement the Water Board re-review of the LTC Evaluation:

1. The statistical evaluation in the Closure Evaluation was performed utilizing data from 2016 to present. This timeframe was selected to evaluate the performance of more recent enhanced in-situ bioremediation treatment and show how the plume may behave under MNA conditions. Statistical evaluation utilizing the entirety of the data set was also performed as it shows the broader scope of plume behavior through 40 years of monitoring and the effects of multiple remedial actions over the last 35 years. This evaluation is summarized for PCE, TCE, cis-1,2-DCE, and vinyl chloride in Table 1 and

Attachment 1 and the inset table below for PCE.

Additionally, as provided in the Closure Evaluation, with the goal of determining whether the pollutant sources have been remediated to the extent practicable in groundwater, Attachment 2 that was Figure 21 in the Closure Evaluation shows the total estimated average VOC mass (summation of PCE, TCE, cis-1,2-DCE, and vinyl chloride) that was calculated between SZ1 through SZ3 at select snapshots in time using the zeroth moment of the spatial moment analysis module included in MAROS software. As shown in Attachment 2, the average total estimated dissolved phase VOC mass can be calculated for SZ1 through SZ3. The maximum total dissolved phase VOC mass combined in SZ1 through SZ3 was 10.7 kilograms (kg) in 1990. In 2025, it was reduced to approximately 0.87 kg, an order of magnitude reduction in total dissolved phase VOC mass since 1990 based on Mission's implementation of a series of Water Board-approved interim and final corrective actions over this 35-year timeframe.

PCE was selected as the contaminant for comparison in the inset table as it was the dry-cleaning solvent released into the environment and is the main risk driver at the Site. Daughter products including TCE, cis-1,2-DCE and vinyl chloride have been generated as a result of bioremediation remedial actions and natural anaerobic biodegradation. These compounds are expected to continue to decrease with time based on the natural biodegradation, dispersion, dilution and retardation processes. A comparison of statistical trends between 2016-2025 and 1988-2025 for PCE, TCE, cis-1,2-DCE and vinyl chloride is shown on the Inset Table below.

Inset Table– Comparison of MAROS PCE Trends 2016-2025 vs 1988-2025

Hydro-stratigraphic Zone	Well IDs	MAROS Trend – PCE	MAROS Statistical Evaluation - % trend	
			2016-2025	1988-2025
Shallow Zone 1	06-01, 07-03, 17-02, 18-02, 21-02, 23-03, 29-02, 55-01, 61-01	Percent non detect, stable or decreasing	44%	78%
		Percent increasing, probably increasing, or no trend	56%	22%
Shallow Zone 2	05-01, 07-02, 17-01, 21-01, 29-01, 55-01	Percent non detect, stable or decreasing	33%	50%
		Percent increasing, probably increasing, or no trend	67%	50%
Shallow Zone 3	07-01, 19-03, 21-03, 23-02, 29-03, 42-03	Percent non detect, stable or decreasing	0%	50%
		Percent increasing, probably increasing, or no trend	100%	50%
Shallow Zone 4	06-03, 15-03	Percent non detect, stable or decreasing	0%	0%
		Percent increasing, probably increasing, or no trend	100%	100%

As shown in the inset table, analyzing the entirety of the groundwater data set with the 25 remaining wells in the 2026 MRP shows a higher percentage of decreasing trends and a lower percentage of increasing

trends compared to the 2016-2025 statistical evaluation that was included in the Closure Evaluation.

2. Tables 2 through 6 provide an evaluation of the 2026 MRP Well List compared to LTC criteria. Many of the groundwater monitoring wells with statistically increasing trends identified in the 2016-2025 evaluation have VOC concentrations that are near or below the maximum contamination level (MCL) and pose little or no risk to receptors. This table places these wells in the broader Site context and brings in other narrative discussion from the Closure Evaluation as needed to provide further justification for destruction of the wells in accordance with the Water Board LTC criteria.

REQUEST FOR ADDITIONAL REVIEW AND REVISED RESPONSE

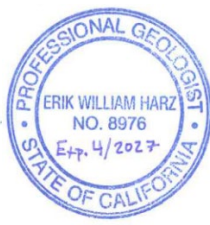
Apex requests that the Water Board reconsider its decision to require continued monitoring at the 25 monitoring well locations indicated in the 2026 MRP by conducting a appropriate evaluation consistent with the Water Board LTC Guidance. Such a review should weigh all nine narrative criteria, rather than focusing on recent statistical trends, and determine whether the remaining wells meet the comprehensive intent of the LTC Guidance. If not, the Water Board should identify specific LTC criteria that remain unmet.

Conclusions:

1. VOC impacts along Garden Street are the responsibility of up-sewer flow dischargers and the City related to their damaged sewer system that has distributed and exacerbated VOC contamination along the Garden Street utility corridor for an unknown period of time and continues to date. The Water Board has not disputed the technical positions established by Apex and the Mission team over the past five years with respect to this area.
2. The Water Board did not perform a comprehensive review of the Closure Evaluation in accordance with the Water Board's own LTC Guidance. The Water Board focused on only one line of evidence rather than evaluating all nine narrative criteria included in the LTC Guidance. Apex believes that consideration of the full ~35-year data set provides the appropriate context for interpreting the statistical analysis provided in the Closure Evaluation. Statistical analysis of the full data set demonstrates an overall collapsing plume and decreasing concentration trends over time.
3. Continued monitoring and evaluating the feasibility of remediation in the vicinity of well 23-03 provides a reasonable protective mechanism for managing the remaining significant groundwater impacts while allowing destruction of wells elsewhere at the Site where concentrations no longer present a significant threat to human health or the environment and meet the Water Board LTC Guidance.

Sincerely,

Apex Companies, LLC



Erik Harz, PG
Principal Geologist



Daniel Grasmick, PE
Principal Chemical Engineer

Attachments:

Table 1	Comparison of MAROS Summaries: 2016-2025 and 1988-2025
Table 2	2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Attachment 1	MAROS Summary – 1988-2025
Attachment 2	Closure Evaluation Figure 21 – Estimated Dissolved Mass (kg) Versus Time

TABLES

Table 1 - Revised Table 3 MAROS Statistical Summary
Former Ambassador Laundry Site
Santa Barbara, California

Hydrostratigraphic Zone	Statistical Category	MAROS Statistical Summary by Chemical							
		PCE		TCE		cis-1,2-DCE		Vinyl Chloride	
		2016 -2025	1988 - 2025	2016 -2025	1988 - 2025	2016 -2025	1988 - 2025	2016 -2025	1988 - 2025
Shallow Zone 1 (SZ1) 9 Wells Total									
Monitoring Wells: 06-01, 07-03, 17-02, 18-02, 21-02, 23-03, 29-02, 55-01*, 61-01	Wells non-detect for constituent	2 (23-03, 55-01)	--	--	--	---	---	3 (29-02, 55-01, and 61-01)	3 (29-02, 55-01, and 61-01)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	2 (07-03, 21-02)	7 ^{Note 1} (06-01, 07-03, 17-02, 18-02, 21-02, 55-01, 61-01)	5 (07-03, 18-02, 21-02, 55-01, 61-01)	6 (06-01, 07-03, 17-02, 18-02, 21-01, 61-01)	4 (17-02, 21-02, 29-02, 61-01)	5 (07-03, 18-02, 23-03, 29-02, 61-01)	1 (17-02)	2 (07-03, 17-02)
	Wells showing ' No Trend ' in both statistical tests	2 (06-01, 18-02)	1 (23-03)	1 (23-03)	1 (23-03)	1 (23-03)	--	1 (23-03)	1 (23-03)
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	3 (17-02, 29-02, 61-01) Note: All PCE detections have ranged between ND to 35 µg/L since 2009	1 (29-02) Note: PCE detections for well 29-02 have been below the MCL since August 1991.	3 (06-01, 17-02, 29-02) Note: TCE detections have been at or below the MCL since 2016	2 (29-02, 55-01) TCE detections at both wells have been below the MCL since 2004	4 (06-01, 07-03, 18-02, 55-01) Note: Concentrations have ranged between ND to 150 µg/L	4 (06-01, 17-02, 21-02, 55-01)	4 (06-01, 07-03, 18-02, 21-02) Note: VC detections are 1.1 µg/L (06-1), 0.74 µg/L (07-03), 7.2 µg/L (18-02), and 160 µg/L (21-02)	3 (06-01, 18-02, 21-02) Note: VC detections are 1.1 µg/L (06-1), 7.2 µg/L (18-02), and 160 µg/L (21-02)
	Percent non detect, stable or decreasing	44%	78%	56%	67%	44%	56%	44%	56%
	Percent increasing, probably increasing, or no trend	56%	22%	44%	33%	56%	44%	56%	44%
Shallow Zone 2 (SZ2) 6 Wells Total									
Monitoring Wells: 05-01, 07-02,17-01, 21-01, 29-01, 55-01*	Wells non-detect for constituent	1 (55-01)	--	--	--	2 (05-01, 29-01)	1 (29-01)	4 (05-01, 17-01, 29-01, 55-01)	4 (05-01, 17-01, 29-01, 55-01)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	1 (21-01)	3 (07-02, 21-01, 55-01,)	3 (17-01, 29-01, 55-01)	4 (05-01, 07-02, 21-01, 29-01)	3 (07-02, 17-01, 21-01)	1 (05-01)	1 (07-02)	1 (07-02)
	Wells showing ' No Trend ' in both statistical tests	--	--	2 (05-01, 21-01)	0	--	--	--	--
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	4 (05-01, 07-02, 17-01, 29-01) Note: PCE detections are 14 µg/L (05-01), 11 µg/L (07-02), 7.5 µg/L (17-01), 7.6 µg/L (29-01)	3 (05-01,17-01,29-01) Note: PCE detections are 14 µg/L (05-01), 7.5 µg/L (17-01), 7.6 µg/L (29-01)	1 (07-02) Note: TCE concentrations have been below the MCL since 2003	2 (17-01, 55-01) Note: TCE has never been detected above the MCL in wells 17-01 or 55-01	1 (55-01) Note: Detections in well 55-01 have been below the MCL or non-detect since 1994	4 (07-02, 17-01, 21-01, 55-01)	1 (21-01) Note: VC concentrations are 250 µg/L (21-02)	1 (21-01) Note: VC concentrations are 250 µg/L (21-02)
	Percent non detect, stable or decreasing	33%	50%	83%	67%	83%	33%	83%	83%
	Percent increasing, probably increasing, or no trend	67%	50%	17%	33%	17%	67%	17%	17%

Table 1 - Revised Table 3 MAROS Statistical Summary
Former Ambassador Laundry Site
Santa Barbara, California

Hydrostratigraphic Zone	Statistical Category	MAROS Statistical Summary by Chemical							
		PCE		TCE		cis-1,2-DCE		Vinyl Chloride	
		2016 -2025	1988 - 2025	2016 -2025	1988 - 2025	2016 -2025	1988 - 2025	2016 -2025	1988 - 2025
Shallow Zone 3 (SZ3) 6 Wells Total									
Monitoring Wells: 07-01, 19-03, 21-03, 23-02, 29-03, 42-03	Wells non-detect for constituent	--	--	2 (29-03, 42-03)	1 (29-03)	2 (19-03, 29-03)	2 (19-03, 29-03)	4 (19-03, 21-03, 29-03, 42-03)	4 (19-03, 21-03, 29-03, 42-03)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	--	3 (07-01, 23-02, 42-03)	1 (19-03)	3 ^{Note 2} (07-01, 19-03 42-03)	1 (42-03)	1 (42-03)	1 (07-01)	1 (07-01)
	Wells showing ' No Trend ' in both statistical tests	1 (07-01)	--	1 (07-01)	--	2 (07-01, 23-02)	--	1 (23-02)	--
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	5 (19-03, 21-03, 23-02, 29-03, 42-03) Note: PCE concentrations are 19 µg/L (19-03), 99 µg/L (21-03), 51 µg/L (23-02), 3.2 µg/L (29-03), and 42 µg/L (42-03)	3 (19-03, 21-03, 29-03) Note: PCE concentrations are 19 µg/L (19-03), 99 µg/L (21-03), 3.2 µg/L (29-03), and 42 µg/L (42-03)	2 (21-03, 23-02) Note: TCE concentrations detected at the two monitoring wells is below the MCL, ranging from ND to 3.0 µg/L	2 (21-03, 23-02) Note: TCE concentrations detected at the two monitoring wells is below the MCL, ranging from ND to 3.0 µg/L	1 Note: cis-1,2-DCE concentrations are ND at 21-03	3 (07-01, 21-03, 23-02)	--	1 (23-02)
	Percent non detect, stable or decreasing	0%	50%	50%	67%	50%	50%	83%	83%
	Percent increasing, probably increasing, or no trend	100%	50%	50%	33%	50%	50%	17%	17%
Shallow Zone 4 (SZ4) 2 Wells Total									
Monitoring Wells: 06-03, 15-03	Wells non-detect for constituent	--	--	1 (15-03)	--	2 (06-03, 15-03)	2 (06-03, 15-03)	2 (06-03, 15-03)	2 (06-03, 15-03)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	--	--	1 (06-03)	2 (06-03, 15-03)	--	--	--	--
	Wells showing ' No Trend ' in both statistical tests	--	--	--	--	--	--	--	--
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	2 (06-03, 15-03) Note: PCE detections currently range between 18 to 28 µg/L	2 (06-03, 15-03) Note: PCE detections currently range between 18 to 28 µg/L	--	--	--	--	--	--
	Percent non detect, stable or decreasing	0%	0%	100%	100%	100%	100%	100%	100%
	Percent increasing, probably increasing, or no trend	100%	100%	0%	0%	0%	0%	0%	0%

Table 1 - Revised Table 3 MAROS Statistical Summary
Former Ambassador Laundry Site
Santa Barbara, California

Hydrostratigraphic Zone	Statistical Category	MAROS Statistical Summary by Chemical							
		PCE		TCE		cis-1,2-DCE		Vinyl Chloride	
		2016 -2025	1988 - 2025	2016 -2025	1988 - 2025	2016 -2025	1988 - 2025	2016 -2025	1988 - 2025
Upper Production Zone (UPZ) 3 Wells Total									
Monitoring Wells: 11-01, 22A2, VCP-2	Wells non-detect for constituent	2 (11-01, 22A2)	2 (11-01, 22A2)	3 (11-01, 22A2, VCP-2)	3 (11-01, 22A2, VCP-2)	3 (11-01, 22A2, VCP-2)	3 (11-01, 22A2, VCP-2)	3 (11-01, 22A2, VCP-2)	3 (11-01, 22A2, VCP-2)
	Wells exhibiting ' Decreasing ', ' Probably Decreasing ', or ' Stable ' trends in at least one statistical test	--	--	--	--	--	--	--	--
	Wells showing ' No Trend ' in both statistical tests	1 (VCP-2)	1 (VCP-2)	--	--	--	--	--	--
	Wells exhibiting ' Increasing ' or ' Probably Increasing ' trends in at least one statistical test	--	--	--	--	--	--	--	--
	Percent non detect, stable or decreasing	67%	67%	100%	100%	100%	100%	100%	100%
	Percent increasing, probably increasing, or no trend	33%	33%	0%	0%	0%	0%	0%	0%

Notes:
MAROS = Monitoring and Remediation Optimization System
PCE = Tetrachloroethene
TCE = Trichloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
VC=Vinyl Chloride
MCL = Maximum Contaminant Level
µg/L = microgram per lieter
ND = Not detected above laboratory reporting limit
*55-01 is screened in both SZ1 and SZ2 water-bearing zones
Wells 38-01, 53-01, and 62-01 have been excluded from statistical analysis as they are situated along the Garden Street utility corridor
-- Not applicable
Note 1 = Well 29-02 had a decreasing trend using the linear regression analysis in MAROS. However, as a conservative measure, it is counted as increasing due to the increasing Mann-Kendall trend observed in MAROS.
Note 1 = Well 23-02 had a decreasing trend using the Mann-Kendall analysis in MAROS. However, as a conservative measure, it is counted as increasing due to the increasing linear regression trend observed in MAROS.

Table 2
Shallow Zone One Wells - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)		
Former Source Area										
23-03	9,200	<500	710	<500	230,000	19,000	55,000	18,000	Planned for Continued Monitoring by Mission	Not applicable
	PCE has not been detected in well since 2016		Exhibits 'no-trend'		Exhibits 'no-trend'		Exhibits 'no-trend'			
06-01	1,300	0.69	110	3.0	180	150	1.3	1.1	Remove from 2026 MRP and destroy well.	PCE and TCE concentrations are well below their historical maximums of 1,300 µg/L and 110 ug/L, respectively, despite recent no trend and increasing trends observed from 2016 to 2025. PCE and TCE concentrations have remained below MCLs since 2018 and 2016, respectively. Cis-1,2-DCE and VC are products of EISB remediation, are expected to decrease with time and and are limited by remaining dissolved phase PCE and TCE.
	Exhibits 'no-trend' in at least one statistical test. PCE concentrations ranged from only <0.50 to 6.4 µg/L over the past nine years. PCE was last detected above its MCL (5.0 µg/L) in March 2018 and has been below the MCL in the 11 subsequent monitoring events, which concentrations ranging from <0.50 to 0.76 µg/L.		Exhibited 'Increasing' or 'Probably Increasing' trends in at least one statistical test. However, all TCE concentrations were at or below the MCL (5.0 µg/L) over the past nine years (most recent at 3.0 µg/L).		Exhibited 'Increasing' or 'Probably Increasing' trends in at least one statistical test. However, cis-1,2-DCE concentrations in monitoring well 06-01 have ranged from 1.4 to 150 µg/L over the past nine years, with the most recent detection at 150 µg/L.		Exhibited trends designated as 'Increasing' or 'Probably Increasing' in at least one statistical test. However, VC concentrations in monitoring well 06-01 have ranged from <0.5 to 1.3 µg/L since 2016 (most recent at 1.1 µg/L).			
07-03	3,500	<0.50	460	<0.50	1,300	3.2	63	0.74	Remove from 2026 MRP and destroy well.	PCE and TCE have have been below MCLs for nine years. Daughter products cis-1,2-DCE and vinyl chloride are well below their maximums of 1,300 µg/L and 63 µg/L, respectively, and are both currently at or below the MCL. PCE and TCE do not remain above the MCL, are stable or decreasing, and prevent generation of further cis-1,2-DCE and vinyl chloride.
	Exhibited PCE trends that were designated as 'Decreasing' over time with detections over the past nine years ranging from <0.50 to 3.3 µg/L. All PCE concentrations are below the MCL (5.0 µg/L) over the past 9 years.		Exhibited TCE concentrations that were designated as 'Stable' over time. TCE concentrations detected in monitoring well 07-03 were at or below the MCL (5.0 µg/L) over the past nine years (most recent at <0.50 µg/L).		Exhibited 'Increasing' trends in both statistical tests. However, Cis-1,2-DCE concentrations in monitoring well 07-03 have ranged from <0.5 to 11 µg/L over the past nine years, with the most recent detection at 3.0 µg/L.		Exhibited VC concentrations trends designated as 'Probably Increasing' in both statistical tests. However, VC concentrations in monitoring well 07-03 have only ranged from ND<0.5 to 4.7 µg/L since 2016 (most recently at 0.74 µg/L).			
Mid-Gradient Area										
17-02	5,400	9.5	61	4.2	69	7.0	15	<0.50	Remove from 2026 MRP and destroy well.	Recent increasing trends are evident in primary compounds PCE and TCE, however concentrations are 9.5 and 4.2 ug/L, respectively, and are well below their historical max concentrations of 5,400 µg/L and 69 µg/L, respectively. Daughter product cis-1,2-DCE was most recently detected just above the MCL at a concentration of 7.0 µg/L. Daughter product VC concentrations have been non-detect since 2017.
	Exhibited 'Increasing' trends in at least one statistical test. PCE concentrations in 17-02 have ranged from <0.5 to 26 µg/L over the past nine years, with the most recent result at 9.0 µg/L.		Exhibited 'Increasing' trends in both statistical tests. TCE levels detected in monitoring well 17-02 were at or below the MCL (5.0 µg/L) over the past nine years (most recent at 4.2 µg/L).		Exhibited cis-1,2-DCE concentrations were designated as 'stable' in bot of the statistical tests and concentrations for cis-1,2-DCE in monitoring well 17-02 have ranged from 1.3 to 8.7 µg/L over the past nine years, with the most recent detection being 7.0 µg/L.		Exhibited VC concentrations were designated as 'Decreasing' over time. Since 2017, VC has not been detected.			
18-02	2,700	<0.50	100	<0.50	550	25	42	7.2	Remove from 2026 MRP and destroy well.	Primary compound PCE indicates no-trend, however it has been non-detect for 8 years and below the MCL since 2011. TCE indicates a stable or decreasing trend and has been non-detect for 7 years. Daughter products cis-1,2-DCE and VC indicate increasing trends, but no primary compounds remain and the detections are low at 25 µg/L and 7.2 µg/L and well below their historical max concentrations of 550µg/L and 42 µg/L, respectively.
	This is a 'no-trend' well; however, since 2019 PCE has not been detected. All detections of PCE have been below the MCL since 2011.		Exhibited TCE concentrations that were designated as either 'No-trend' or 'Decreasing' over time in at least one statistical test and since 2018, TCE has not been detected.		Exhibited 'No-trend' or 'Probably Increasing' trends in at least one statistical test. However, Cis-1,2-DCE concentrations in monitoring well 18-02 have ranged from <0.5 to 58 µg/L over the past nine years, with the most recent detection at 25 µg/L.		Exhibited VC concentrations trends designated as 'No-trend' or 'Probably Increasing' over the evaluated time interval in at least one statistical test. However, VC concentrations in monitoring well 18-02 have ranged from <0.5 to 20 µg/L, and most recently at 7.2 µg/L.			
Down-Gradient Area										
21-02	1,500	<0.50	140	<0.50	420	140	160	160	Remove from 2026 MRP and destroy well.	PCE and TCE concentrations have been reduced to non-detect since 2017 and are below the MCLs. Cis-1,2-DCE concentrations are stable or decreasing and are below the maximum of 420 µg/L. Vinyl chloride is increasing; however the magnitude of increase is limited by remaining cis-1,2-DCE as PCE and TCE have been eliminated. Cis-1,2-DCE and VC are by-products of EISB treatment.
	Exhibited PCE trends that were designated as either 'No-trend' or 'Decreasing' over time. Since 2017, PCE has been below the MCL and non-detect.		Exhibited TCE concentrations that were designated as either 'No-trend' or 'Decreasing' over time in at least one statistical test. Since 2017, TCE has been below the MCL and non-detect.		Exhibited cis-1,2-DCE concentrations that were designated as 'Stable', 'Probably Decreasing', or 'Decreasing' over time in at least one of the statistical tests.		Exhibited VC concentrations trends designated as 'Increasing' or 'Probably Increasing' over the evaluated time interval in at least one statistical test. However, VC concentrations in monitoring well 21-02 have ranged from <5.0 to 160 µg/L, and most recently at 160 µg/L.			

Table 2
Shallow Zone One Wells - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)		
29-02	30	1.1	5.2	0.59	2.8	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite a mix of increasing, stable, decreasing, and non-detect trends respectively, the highest concentration is TCE and it is 3.8 ug/L. This is a cross gradient well and the magnitude of VOC mass upgradient of this well has been reduced by remedial actions.
	Exhibited either 'Increasing' or 'Probably Increasing' trends in at least one statistical test over the time interval. However, PCE concentrations in 29-02 were at or below the MCL (5.0 µg/L) over the past nine years (ranging from ND<0.5 to 1.8 µg/L, with the most recent result at 1.1 µg/L).		Exhibited 'Increasing' or 'Probably Increasing' trends in at least one statistical test. However, TCE concentrations detected in monitoring well 29-02 have been below the MCL (5.0 µg/L) for the past nine years (most recent at 0.59 µg/L).		Exhibited cis 1,2-DCE concentrations that were designated as 'Stable', 'Probably Decreasing', or 'Decreasing' over time in at least one of the statistical tests with no detections for cis-1,2-DCE since 2010.		VC has never been detected at this well location.			
61-01	75	17	20	3.8	16	1.1	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite a mix of recent increasing, stable, decreasing, and non-detect trends respectively, PCE is only detected at a concentration of 17 µg/L in the most recent monitoring event, compared to a historical concentration of 75 µg/L. TCE concentrations are stable and in the most recent monitoring event were detected at concentration of 3.8 µg/L. Daughter products cis-1,2-DCE and VC are decreasing or stable and are below the MCLs.
	Exhibited either 'No-trend' or 'Probably Increasing' trends in at least one statistical test. However, PCE concentrations in 61-01 have ranged from 7.1 to 35 µg/L over the past nine years, with the most recent result at 17 µg/L.		Exhibited TCE concentrations that were designated as 'Stable' over time in both statistical tests. Concentrations have ranged from <0.5 to 9.6 µg/L over the past nine years, with the most recent result at 3.8 µg/L.		Exhibited cis 1,2-DCE concentrations that were designated as 'Stable' in both of the statistical tests. Cis-1,2-DCE concentrations in monitoring well 61-01 have ranged from ND<0.5 to 4.1 µg/L over the past nine years, with the most recent detection at 1.1 µg/L. All concetrations over the past 9 years are below the MCL.		VC was not detected			
55-01	0.64	<0.5	2.2	2.2	4.2	1.5	<0.5	<0.50	Remove from 2026 MRP and destroy well.	All constituents are below the MCL. Despite the recent increasing trend of cis-1,2-DCE, it is below the maximum of 4.2 ug/L and is likely the result of anaerobic biodegradation.
	PCE was not detected		Exhibited TCE concentrations that were designated as either 'Stable or 'No-Trend' over time in at least one statistical test. TCE has never been detected above its MCL at this location.		Exhibited 'Increasing' or 'Probably Increasing' trends in at least one statistical test. However, Cis-1,2-DCE concentrations in monitoring well 55-01 have ranged from ND<0.5 to 4.2 µg/L over the past nine years, with the most recent detection at 1.5 µg/L.		VC was not detected			

Notes:

Trends results are based on Monitoring and Remediation Optimization System (MAROS) outputs of Mann-Kendall and Linear Regression statistical analyses completed for groundwater analytical data collected between 2016 to 2025 as presented in Apex's January 12, 2026 *Low-Threat Closure Evaluation and Off-Site No Further Action Request* (Apex, 2026).

PCE = Tetrachloroethene
TCE = Trichloroethene
DCE = Dichloroethene
VC = Vinyl Chloride
ND = Not detected
<X = Not detected above indicated laboratory reporting limit
µg/L = microgram per liter
MCL = California maximum contaminant levels for drinking water
MRP = Monitoring and Reporting Program
Wells 38-01, 53-01, and 62-01 are included in the 2026 MRP, but have been excluded from this table as they are situated along the Garden Street utility corridor

Table 3
Shallow Zone Two Wells - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)		
Former Source Area										
05-01	81	14	96	0.82	38	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite the increasing PCE trend, concentrations have ranged between 8.7 µg/L and 19 µg/L over the last nine years and are well below the historical max of 81 µg/L. Multiple aquitards separate SZ2 impacts from the UPZ. EISB has significantly reduced PCE impacts to SZ2. Natural processes such as dilution, dispersion, and retardation are expected to continue to reduce PCE.
	Exhibited PCE concentration trends designated as 'Increasing' or 'Probably Increasing.' However, PCE concentrations in monitoring well 05-01 have ranged from 8.7 to 19 µg/L over the past nine years, with the most recent detection at 14 µg/L.		This is a no-trend well however, TCE concentrations in monitoring well 05-01 have ranged from <0.50 to 0.98 µg/L over the past nine years, with the most recent detections at 0.82 µg/L. TCE is below the MCL over the past 9 years.		Cis-1,2-DCE was not detected		VC was not detected			
07-02	960	11	23	0.99	21	0.99	0.58	<0.50	Remove from 2026 MRP and destroy well.	Despite the increasing PCE trend, concentrations have ranged between non-detect and 11 µg/L over the last nine years and are well below the historical max of 960 µg/L. Multiple aquitards separate SZ2 impacts from UPZ. EISB has significantly reduced PCE impacts to SZ2. Natural processes such as dilution, dispersion, and retardation are expected to continue to reduce PCE.
	Exhibited PCE concentration trends that were designated as 'increasing' . However PCE concentrations in well 07-02 have ranged from non-detect to 15 µg/L. The most recent detection was 11 ug/L.		Exhibited TCE concentration trends that were designated 'Increasing' in both statistical tests. However, TCE detections in monitoring well 07-02 have been below the MCL of 5 µg/L for over 9 years, and the most recent result was 0.99 µg/L.		Exhibited cis-1,2-DCE concentration trends designed as either 'Probably Decreasing' or 'Decreasing' in at least one of the statistical tests, with concentrations of cis-1,2-DCE ranging from <0.50 to 10 µg/L over the past nine years, and the most recent result was 0.99 µg/L.		Exhibited VC concentration trends designed as either 'Stable' or 'Probably Decreasing'. VC has been non detect in monitoring well 07-02, except for detections in 2020 at 0.58 µg/L and in 2021 at 0.57 µg/L.			
Mid-Gradient Area										
17-01	58	7.5	4.7	0.66	6.0	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite the increasing PCE trend, concentrations have ranged between non-detect to 8.8 µg/L and have been near or below the MCL over the last nine years. PCE concentrations remain well below their maximum of 58 µg/L. Multiple aquitards separate SZ2 impacts from UPZ. EISB has significantly reduced PCE impacts to SZ2. Natural processes such as dilution, dispersion, and retardation are expected to continue to reduce PCE.
	Exhibited PCE concentration trends designated as 'Increasing.' However, PCE concentrations in monitoring well 17-01 have been at or below the MCL, with the most recent detection at 7.5 µg/L.		Exhibited TCE concentrations that were designated as 'Stable' or 'No-Trend'. Concentrations of TCE in monitoring well 17-01 have been below the MCL of 5 µg/L and have ranged from <0.50 to 1.4 µg/L over the past nine years with the most recent result at 0.66 µg/L.		Exhibited cis-1,2-DCE concentration trends designed as either 'Probably Decreasing' or 'Decreasing' in at least one of the statistical tests and concentrations of cis-1,2-DCE have ranged from <0.50 to 3.5 µg/L with the most recent results at <0.50 µg/L.		VC was not detected			
Down-Gradient Area										
21-01	3,500	<2.5	120	<2.5	670	110	250	250	Remove from 2026 MRP and destroy well.	PCE is below the MCL and is well below its historic high of 3,500 µg/L. Despite TCE having a recent no-trend, it has been below the MCL or non-detect since 2019. Cis-1,2-DCE is stable or decreasing and at 110 µg/L which is well below its maximum of 670 µg/L. Vinyl Chloride is increasing, but the magnitude of further increase is limited by cis-1,2-DCE. Cis-1,2-DCE and vinyl chloride generation are a result of EISB that has been performed in the vicinity of 21-01. Upgradient remediation has reduced PCE to 14 µg/L so there is little residual mass migrating towards 21-01.
	Exhibited PCE concentrations that were designated as 'Probably Decreasing' in both statistical tests. PCE has been non detect and below the MCL of 5 µg/L in monitoring well 21-01 since 2019.		Exhibited TCE concentration trends that were designated as 'No-Trend' or 'Increasing'. However, TCE in monitoring well 21-01 has been non-detect since 2019, except for a detection in 2024 at 1.8 µg/L. TCE has been below the MCL of 5 µg/L since 2019.		Exhibited cis-1,2-DCE concentration trends designed as 'Decreasing' in both of the statistical tests.		Exhibited VC concentration trends that were designated as 'Increasing' or 'Probably Increasing' in at least one statistical test. However, VC concentrations in monitoring well 21-01 have ranged from 1.2 µg/L to 250 µg/L, with the most recent result being 250 µg/L.			

Table 3
Shallow Zone Two Wells - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
29-01	120	7.6	1.4	<0.50	<1.0	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite the recently increasing PCE trend, PCE concentrations in 29-01 have generally been below the MCL and are well below the historic maximum of 120 µg/L/L. All other constituents are stable or decreasing and are below the MCL.
	Exhibited PCE concentration trends designated as 'Increasing.' However, PCE concentrations in monitoring well 29-01 have been generally below the MCL (5.0 µg/L), with the most recent detection at 7.6 µg/L.		Exhibited TCE concentrations were designated as 'Stable' however, TCE has not been detected in monitoring well 29-01 since 2003 except for one detection in 2022 at 0.64 µg/L.		Cis-1,2-DCE was not detected		VC was not detected			

Notes:
Trend results are based on Monitoring and Remediation Optimization System (MAROS) outputs of Mann-Kendall and Linear Regression statistical analyses completed for groundwater analytical data collected between 2016 to 2025 as presented in Apex's January 12, 2026 *Low-Threat Closure Evaluation and Off-Site No Further Action Request* (Apex, 2026).
PCE = Tetrachloroethene
TCE = Trichloroethene
DCE = Dichloroethene
VC = Vinyl Chloride
µg/L = microgram per liter
SZ2 = Shallow Zone Two
UPZ = Upper Producing Zone
EISB = Enhanced In-Situ Bioremediation
ND = Not detected
<X = Not detected above indicated laboratory reporting limit
MCL = California maximum contaminant levels for drinking water
MRP = Monitoring and Reporting Program
Well 62-01 is included in the 2026 MRP, but has been excluded from this table as they are situated along the Garden Street utility corridor

Table 4
Shallow Zone Three Wells - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)		
Former Source Area										
23-02	1,400	51	42	2.1	77	3.0	38	<1.0	Remove from 2026 MRP and destroy well.	Despite the recent increasing PCE trend, concentrations have ranged between non-detect and 88 µg/L over the last ten years and are well below the historical max of 1,400 µg/L. Primary source and conduit of PCE eliminated (former Ambassador Well). Multiple aquitards separate SZ3 from UPZ. Natural processes such as dilution, dispersion, retardation are expected to continue to reduce PCE. No unacceptable future or current risks based on Conceptual Site Model; therefore, no further monitoring necessary.
	Exhibited PCE concentration trends that are designated as 'Increasing' or 'No-Trend' in at least one of the statistical tests. However, PCE concentrations detected in 23-02 have ranged from ND<1.0 to 88 µg/L over the past 9 years, and were most recently detected at 51 µg/L.		TCE concentration trends were designated as 'Increasing' over the evaluated time interval. However, TCE concentrations detected in monitoring well 23-02 have ranged from ND<0.5 to 8.2 µg/L over the past nine years, and were most recently detected at 2.1 µg/L.		This is a no-trend well however, cis-1,2-DCE concentrations detected in monitoring well 23-02 have ranged from 1.7 to 77 µg/L (in 2018) over the past nine years, with the most recent detection at 3.0 µg/L.		This is a no-trend well however, VC concentrations detected in monitoring well 23-02 have ranged from ND<0.50 to 38 µg/L with the most recent detection at ND<1.0.			
07-01	260	18	49	2.4	48	2.8	0.35	<0.50	Remove from 2026 MRP and destroy well.	Despite the recent no trend, PCE, concentrations have ranged between non-detect and 18 µg/L over the last nine years and are well below the historical max of 260 µg/L. Primary source and conduit of PCE eliminated (former Ambassador Well) Multiple aquitards separate SZ3 impacts from UPZ. Natural processes such as dilution, dispersion, retardation are expected to continue to reduce PCE. No unacceptable future or current risks based on Conceptual Site Model; therefore, no further monitoring necessary.
	This is a no-trend well however, PCE concentrations detected in monitoring well 07-01 have ranged from <0.50 to 18 µg/L over the past nine years, with the most recent detection at 18 µg/L.		This is a no-trend well however TCE concentrations detected in monitoring well 07-01 have ranged from ND<0.50 to 6.0 µg/, with the most recent detection at 2.4 µg/L.		This is a no-trend well however, cis-1,2-DCE concentrations detected in monitoring well 07-01 have ranged from ND<0.50 to 6.8 over the past nine years, with the most recent detection at 2.8 µg/L.		VC trends in monitoring well 07-01 was designated as 'Probably Decreasing' or 'Stable' in at least one of the statistical tests VC has not been detected in this well.			
Mid-Gradient Area										
19-03	69	19	7.6	<0.50	<1.0	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite the recent increasing PCE trend, concentrations have only ranged between 1.4 ug/L and 18 µg/L over the last nine years and are well below the historical max of 69 µg/L. Primary source and conduit of PCE eliminated (former Ambassador Well). Multiple aquitards separate SZ3 impacts from UPZ. Natural processes such as dilution, dispersion, retardation are expected to continue to reduce PCE.No unacceptable future or current risks based on Conceptual Site Model; therefore, no further monitoring necessary.
	Exhibited PCE concentration trends that are designated as 'Increasing' in both statistical tests. However, over the past nine years, PCE concentrations detected in monitoring well 19-03 have ranged from 1.4 to 19 µg/L over the past 9 years, and were most recently detected at 19 µg/L.		Exhibited TCE concentration trends that are designated as 'Stable' or 'Probably Decreasing' in at least one of the statistical tests however, TCE has not been detected in monitoring well 19-03 since 2003.		Cis-1,2-DCE has not been detected		VC has not been detected			
42-03	370	42	0.8	<0.50	0.67	0.67	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite the recently increasing PCE trend, concentrations have ranged between 26 µg/L and 47 µg/L over the last nine years and are well below the historical max of 370 µg/L. Primary source and conduit of PCE eliminated (former Ambassador Well) Multiple aquitards separate SZ3 impacts from UPZ. Natural processes such as dilution, dispersion, retardation are expected to continue to reduce PCE. No unacceptable future or current risks based on Conceptual Site Model; therefore, no further monitoring necessary.
	Exhibited PCE concentration trends that are designated as 'Increasing' in at least one of the statistical tests. However, PCE concentrations detected in 42-03 have ranged from 26 to 47 µg/L over the past nine years, and most recently detected at 42 µg/L		TCE was not detected		Cis-1,2-DCE trends were designated as 'Stable' in both of the statistical tests for well 42-03 however, cis-1,2-DCE has not been detected since 1988 except for in 2025 at 0.67 µg/L.		VC has not been detected			

Table 4
Shallow Zone Three Wells - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)		
Down-Gradient Area										
21-03	130	99	4.5	3.0	1.7	<2.5	<1.0	<2.5	Remove from 2026 MRP and destroy well.	Despite the recent increasing trend of PCE, the primary source and conduit of PCE has been eliminated (Former Ambassador Well). Multiple remedial actions have been performed in SZ3 at 21-03 and upgradient. Highest upgradient PCE concentration is 51 ug/L which generally limits the magnitude of increase that can be expected in the future. Natural processes such as dilution, dispersion, and retardation are expected to continue to reduce PCE. No unacceptable future or current risks based on Conceptual Site Model; therefore, no further monitoring necessary.
	Exhibited PCE concentration trends that are designated as 'Increasing' in at least one of the statistical tests. However, PCE concentrations detected in 21-03 have ranged from 58 to 120 µg/L in the last nine years, and most recently detected at 99 µg/L.		TCE concentration trends were designated as or 'Increasing'. However, TCE concentrations detected in monitoring well 21-03 are below the MCL (5.0 µg/L), and range between <0.5 µg/L and 3.0 µg/L, and were most recently detected at 3.0 µg/L		Exhibited concentration trends designated at 'Increasing' in at least one statistical test. However, cis-1,2-DCE concentrations detected in monitoring wells 21-03 have been non-detect (ND<0.5 to ND<2.5 µg/L) with one exception in February 2025 (1.7 µg/L).		VC has not been detected			
29-03	3.2	3.2	<1.0	<0.50	<1.0	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Despite the recent increasing trend of PCE, the PCE concentrations are below the MCL and have been below the MCL since groundwater monitoring was initiated at this well. All other daughter products have not been detected and multiple remedial actions have been performed to reduce PCE concentrations upgradient. Further this well is generally located cross gradient so limited concentration increase is expected in the future. No unacceptable future or current risks based on Conceptual Site Model; therefore, no further monitoring necessary.
	Exhibited PCE concentration trends that are designated as 'Increasing' in at least one of the statistical tests. However, PCE concentrations detected in 29-03 have ranged from ND<1.0 to 3.2 µg/L over the past 9 years, and most recently detected at 3.2 µg/L. and PCE has never been detected above the MCL of 5 µg/L in this well.		TCE was not detected		Cis-1,2-DCE has not been detected		VC has not been detected			

Notes:
Trend results are based on Monitoring and Remediation Optimization System (MAROS) outputs of Mann-Kendall and Linear Regression statistical analyses completed for groundwater analytical data collected between 2016 to 2025 as presented in Apex's January 12, 2026Low-Threat Closure Evaluation and Off-Site No Further Action Request (Apex, 2026
PCE = Tetrachloroethene
TCE = Trichloroethene
DCE = Dichloroethene
VC = Vinyl Chloride
µg/L = microgram per liter
SZ3 = Shallow Zone Three
UPZ = Upper Producing Zone
EISB = Enhanced In-Situ Bioremediation
ND = Not detected
<X = Not detected above indicated laboratory reporting limit
MCL = California maximum contaminant levels for drinking water
MRP = Monitoring and Reporting Program

Table 5
Shallow Zone 4 Wells - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)		
Former Source Area										
06-03	22	18	2.8	<0.50	<1.0	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Primary source and conduit of PCE eliminated (former Ambassador Well). 70-foot aquitard separates SZ4 from UPZ. Limited residual impacts. Natural processes such as dilution, dispersion, retardation are expected to continue to reduce PCE. No unacceptable future or current risks based on Conceptual Site Model; therefore, no further monitoring necessary.
	Exhibited concentration trends were designated as either 'Probably increasing' or 'Increasing' in at least one statistical test. In general, concentrations of PCE in monitoring well 06-03 range from 10 to 22 µg/L during the evaluated time interval, and most recently detected at 18 µg/L.		TCE trends over time in monitoring well 06-03 was designated as either 'Probably Decreasing' or 'Stable' using both statistical tests. TCE concentrations detected in 06-03 range from <0.5 to 1.2 µg/L during the evaluated time interval, and below the MCL of 5.0 µg/L.		Cis-1,2-DCE has not been detected		VC has not been detected			
15-03	47	29	3.2	<0.50	<1.0	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	
	Exhibited concentration trends were designated as either 'Increasing' in at least one statistical test. However, concentrations of PCE in monitoring well 15-03 ranged from 15 to 37 µg/L during the evaluated time interval, and most recently detected at 29 µg/L.		TCE has not been detected		Cis-1,2-DCE has not been detected		VC has not been detected			

Notes:
Trend results are based on Monitoring and Remediation Optimization System (MAROS) outputs of Mann-Kendall and Linear Regression statistical analyses completed for groundwater analytical data collected between 2016 to 2025 as presented in Apex's January 12, 2026 *Low-Threat Closure Evaluation and Off-Site No Further Action Request* (Apex, 2026).
PCE = Tetrachloroethene
TCE = Trichloroethene
DCE = Dichloroethene
VC = Vinyl Chloride
µg/L = microgram per liter
SZ3 = Shallow Zone Three
UPZ = Upper Producing Zone
EISB = Enhanced In-Situ Bioremediation
ND = Not detected
<X = Not detected above indicated laboratory reporting limit
MCL = California maximum contaminant levels for drinking water
MRP = Monitoring and Reporting Program

Table 6
Upper Producing Zone - 2026 MRP Groundwater Monitoring Well List Compared to Closure Evaluation Rationale
Former Ambassador Laundry Site
Santa Barbara, California

Well	PCE		TCE		Cis-1,2-DCE		Vinyl Chloride		Conclusion	Closure Evaluation Rationale
	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)	Max (µg/L)	Current (µg/L)		
Former Source Area										
11-01	100	<0.50	2.8	<0.50	1.1	<0.50	<1.0	<0.50	Remove from 2026 MRP and destroy well.	Primary source and conduit of PCE eliminated (former Ambassador Well). Approximate 70-foot aquitard separates upper water bearing zones from UPZ. Limited residual impacts are below the MCL. Last detection of PCE above the MCL was 20 years ago at a well that has been approved for destruction by Water Board in 2026 MRP. Natural processes such as dilution, dispersion, retardation are expected to continue to reduce PCE. Wells VCP-2 and 22A2 are not owned by Mission and can continue to be gauged by other parties if needed. Although gradients have been observed to fluctuate between upward and downward, 11 years of groundwater monitoring data has demonstrated that this has not influenced contaminant migration from the shallow water bearing zones to the UPZ.
	11-01 has been below the MCL for PCE of 5 ug/L since 1992. No longer sampled pursuant to MRP. The last detection of PCE above the MCL in the UPZ was 20 years ago in well 47-01 at 5.6 µg/L. Well 47-01 was approved for destruction by Water Board prior to issuance of the 2026 MRP.									
Off-Site										
VCP-2	7.0	1.1	4.6	<0.50	<1.0	<0.50	<1.0	<0.50	Remove from 2026 MRP.	
	VCP-2 has been below the MCL for PCE of 5 ug/L since 1992. No longer sampled pursuant to MRP. The last detection of PCE in the UPZ was 20 years ago at 5.6 ug/L in well 47-01 which has been approved for destruction by Water Board prior to issuance of the 2026 MRP									
22A2	4.9	<0.50	0.8	<0.50	<1.0	<0.50	<1.0	<0.50	Remove from 2026 MRP.	
	22A2 has been below the MCL since its installation in 1990. No longer sampled pursuant to MRP. The last detection of PCE in the UPZ was 20 years ago at 5.6ug/L in well 47-01 which has been approved for destruction by Water Board prior to issuance of the 2026 MRP									

Notes:
Trend results are based on Monitoring and Remediation Optimization System (MAROS) outputs of Mann-Kendall and Linear Regression statistical analyses completed for groundwater analytical data collected between 2016 to 2025 as presented in Apex's January 12, 2026 *Low-Threat Closure Evaluation and Off-Site No Further Action Request* (Apex, 2026).
PCE = Tetrachloroethene
TCE = Trichloroethene
DCE = Dichloroethene
VC = Vinyl Chloride
µg/L = microgram per liter

ATTACHMENT 1

MAROS Summary – 1988-2025

MAROS Statistical Trend Analysis Summary

Project: Mission Ambassador SZ1

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 6/2/1988 to 7/16/2025

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
06-01	T	92	89	2.0E-02	7.1E-03	No	I	I
07-03	T	104	90	1.2E-01	3.0E-02	No	D	D
17-02	T	94	45	3.9E-03	6.5E-04	No	I	I
18-02	T	95	87	5.3E-02	2.5E-02	No	D	NT
21-02	T	107	106	8.8E-02	3.1E-02	No	I	I
23-03	S	31	28	1.9E+01	2.4E+00	No	PD	NT
29-02	T	110	16	5.9E-04	5.0E-04	No	D	D
38-01	T	111	77	5.1E-03	4.1E-03	No	I	I
53-01	T	83	0	6.9E-04	5.0E-04	Yes	ND	ND
54-01	T	92	0	5.1E-04	5.0E-04	Yes	ND	ND
55-01	T	93	5	5.8E-04	5.0E-04	No	I	I
61-01	T	64	62	5.9E-03	4.2E-03	No	D	D
62-01	T	83	78	1.3E-02	2.2E-03	No	I	I
63-01	T	64	63	4.2E-03	3.6E-03	No	D	D
TETRACHLOROETHYLENE(PCE)								
06-01	T	97	84	1.4E-01	9.6E-02	No	D	D
07-03	T	107	75	4.5E-01	2.7E-01	No	D	D
17-02	T	97	94	2.3E-01	5.4E-02	No	D	D
18-02	T	99	76	4.8E-01	3.5E-01	No	D	D
21-02	T	109	93	4.4E-01	4.2E-01	No	D	D
23-03	S	31	4	6.6E-01	5.0E-02	No	NT	NT
29-02	T	113	29	9.0E-04	5.0E-04	No	I	D
38-01	T	114	103	1.1E-01	4.2E-02	No	I	I
53-01	T	83	83	1.6E-01	1.4E-01	No	D	D
54-01	T	92	1	5.2E-04	5.0E-04	No	D	D
55-01	T	93	1	5.1E-04	5.0E-04	No	D	D
61-01	T	64	64	3.5E-02	3.5E-02	No	D	D
62-01	T	83	83	9.3E-02	2.1E-02	No	I	I
63-01	T	64	63	6.2E-03	5.8E-03	No	D	D
TRICHLOROETHYLENE (TCE)								
06-01	T	97	88	1.2E-02	8.3E-03	No	D	D
07-03	T	107	67	6.8E-02	2.6E-02	No	D	D
17-02	T	97	85	6.7E-03	3.3E-03	No	D	D

MAROS Statistical Trend Analysis Summary

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
TRICHLOROETHYLENE (TCE)								
18-02	T	99	81	2.3E-02	1.6E-02	No	D	D
21-02	T	109	93	2.4E-02	1.8E-02	No	D	D
23-03	S	31	5	3.9E-01	1.0E-01	No	NT	NT
29-02	T	113	32	8.9E-04	5.0E-04	No	I	PI
38-01	T	114	78	9.5E-03	3.8E-03	No	I	I
53-01	T	83	61	1.0E-03	1.0E-03	No	D	D
54-01	T	92	1	5.1E-04	5.0E-04	No	D	D
55-01	T	93	1	5.3E-04	5.0E-04	No	I	I
61-01	T	64	64	1.0E-02	9.8E-03	No	D	D
62-01	T	83	80	1.3E-02	2.4E-03	No	I	I
63-01	T	64	63	1.2E-02	1.2E-02	No	D	PD
VINYL CHLORIDE								
06-01	T	97	11	9.7E-04	5.0E-04	No	I	NT
07-03	T	107	23	3.3E-03	1.0E-03	No	D	NT
17-02	T	97	9	1.4E-03	5.0E-04	No	D	NT
18-02	T	99	29	4.8E-03	1.0E-03	No	I	I
21-02	T	110	40	1.5E-02	5.0E-03	No	I	I
23-03	S	32	32	1.6E+01	1.1E+01	No	NT	NT
29-02	T	113	0	5.3E-04	5.0E-04	Yes	ND	ND
38-01	T	115	0	1.3E-03	5.0E-04	Yes	ND	ND
53-01	T	84	0	7.0E-04	5.0E-04	Yes	ND	ND
54-01	T	92	0	5.2E-04	5.0E-04	Yes	ND	ND
55-01	T	93	0	5.2E-04	5.0E-04	Yes	ND	ND
61-01	T	64	0	5.1E-04	5.0E-04	Yes	ND	ND
62-01	T	84	2	1.2E-03	5.0E-04	No	I	I
63-01	T	64	1	5.2E-04	5.0E-04	No	I	I

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Statistical Trend Analysis Summary

Project: Mission Amb, SZ2

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 6/2/1988 to 7/14/2025

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
05-01	T	88	2	9.3E-04	5.0E-04	No	D	NT
07-02	T	94	41	1.6E-03	5.0E-04	No	I	I
12-01	T	93	43	4.5E-03	5.0E-04	No	I	I
13-01	S	95	37	1.0E-01	2.0E-03	No	I	I
16-01	T	88	19	5.9E-04	5.0E-04	No	I	I
17-01	T	89	16	7.9E-04	5.0E-04	No	I	I
21-01	T	109	100	1.0E-01	6.1E-02	No	I	I
29-01	T	107	0	5.1E-04	5.0E-04	Yes	ND	ND
36-02	T	94	90	3.0E-02	1.0E-02	No	D	D
42-02	T	98	84	9.3E-02	5.9E-02	No	D	D
55-01	T	93	5	5.8E-04	5.0E-04	No	I	I
62-01	T	83	78	1.3E-02	2.2E-03	No	I	I
72-01	T	49	49	1.1E-01	2.1E-02	No	I	I
73-01	T	40	33	1.2E-01	4.8E-02	No	NT	PD
TETRACHLOROETHYLENE(PCE)								
05-01	T	92	91	9.1E-03	6.4E-03	No	I	I
07-02	T	98	90	3.4E-02	1.1E-02	No	D	D
12-01	T	96	86	7.7E-02	9.9E-03	No	D	D
13-01	S	102	82	4.8E+00	1.1E+00	No	D	D
16-01	T	91	91	1.4E-02	1.2E-02	No	D	NT
17-01	T	92	87	9.8E-03	7.4E-03	No	I	I
21-01	T	111	96	1.0E+00	9.0E-01	No	D	D
29-01	T	110	32	1.8E-03	5.0E-04	No	I	I
36-02	T	97	95	8.3E-01	4.7E-01	No	D	D
42-02	T	101	83	1.3E+00	1.0E+00	No	D	D
55-01	T	93	1	5.1E-04	5.0E-04	No	D	D
62-01	T	83	83	9.3E-02	2.1E-02	No	I	I
72-01	T	49	38	2.7E-01	1.5E-01	No	D	D
73-01	T	40	20	4.9E-01	3.9E-03	No	D	D
TRICHLOROETHYLENE (TCE)								
05-01	T	92	69	1.4E-03	8.6E-04	No	D	PD
07-02	T	98	75	1.8E-03	1.1E-03	No	D	NT
12-01	T	96	73	2.3E-03	1.7E-03	No	D	D

MAROS Statistical Trend Analysis Summary

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
TRICHLOROETHYLENE (TCE)								
13-01	S	102	45	3.7E-02	2.5E-03	No	D	NT
16-01	T	91	86	2.2E-03	2.0E-03	No	I	D
17-01	T	92	24	6.8E-04	5.0E-04	No	I	I
21-01	T	111	97	4.0E-02	3.9E-02	No	D	D
29-01	T	110	5	5.1E-04	5.0E-04	No	D	D
36-02	T	97	96	2.9E-02	1.9E-02	No	D	D
42-02	T	101	86	3.9E-02	3.7E-02	No	D	D
55-01	T	93	1	5.3E-04	5.0E-04	No	I	I
62-01	T	83	80	1.3E-02	2.4E-03	No	I	I
72-01	T	49	42	2.4E-02	1.8E-02	No	D	D
73-01	T	40	19	9.3E-03	2.9E-03	No	D	D
VINYL CHLORIDE								
05-01	T	92	0	5.4E-04	5.0E-04	Yes	ND	ND
07-02	T	98	2	6.4E-04	5.0E-04	No	D	D
12-01	T	96	12	9.9E-04	5.0E-04	No	D	D
13-01	S	104	27	2.6E-02	2.5E-03	No	I	I
16-01	T	91	0	5.4E-04	5.0E-04	Yes	ND	ND
17-01	T	92	0	5.4E-04	5.0E-04	Yes	ND	ND
21-01	T	113	30	1.0E-02	1.5E-03	No	I	I
29-01	T	110	0	5.3E-04	5.0E-04	Yes	ND	ND
36-02	T	97	5	1.8E-03	1.0E-03	No	D	PD
42-02	T	101	23	2.5E-02	2.0E-03	No	I	I
55-01	T	93	0	5.2E-04	5.0E-04	Yes	ND	ND
62-01	T	84	2	1.2E-03	5.0E-04	No	I	I
72-01	T	49	10	4.2E-03	2.0E-03	No	I	I
73-01	T	40	19	6.1E-03	3.3E-03	No	NT	NT

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Statistical Trend Analysis Summary

Project: Mission Amb.; SZ3

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 6/2/1988 to 7/15/2025

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
07-01	T	91	22	1.5E-03	5.0E-04	No	I	I
16-03	T	84	3	5.1E-04	5.0E-04	No	I	I
18-03	S	94	23	3.0E-03	5.0E-04	No	I	I
19-03	T	86	0	5.1E-04	5.0E-04	Yes	ND	ND
21-03	T	105	1	6.7E-04	5.0E-04	No	I	I
23-02	T	94	22	3.4E-03	5.0E-04	No	I	I
29-03	T	97	0	5.1E-04	5.0E-04	Yes	ND	ND
41-02	T	87	22	5.9E-04	5.0E-04	No	D	D
42-03	T	92	1	5.3E-04	5.0E-04	No	D	D
56-01	T	83	8	1.2E-03	5.0E-04	No	I	I
TETRACHLOROETHYLENE(PCE)								
07-01	T	96	85	1.6E-02	9.2E-03	No	D	D
16-03	T	84	84	1.3E-02	9.2E-03	No	I	I
18-03	S	96	85	3.0E-01	1.8E-01	No	D	D
19-03	T	86	61	4.7E-03	2.4E-03	No	I	I
21-03	T	106	105	3.8E-02	5.4E-03	No	I	I
23-02	T	96	95	1.5E-01	8.9E-02	No	D	D
29-03	T	97	20	6.8E-04	5.0E-04	No	I	I
41-02	T	89	88	1.0E-02	9.1E-03	No	D	D
42-03	T	92	92	6.1E-02	3.3E-02	No	D	D
56-01	T	83	81	3.7E-02	2.6E-02	No	I	I
TRICHLOROETHYLENE (TCE)								
07-01	T	96	74	1.9E-03	1.0E-03	No	D	D
16-03	T	84	61	1.3E-03	9.3E-04	No	D	D
18-03	S	96	22	5.2E-03	5.0E-04	No	D	D
19-03	T	86	8	6.5E-04	5.0E-04	No	D	D
21-03	T	105	12	7.4E-04	5.0E-04	No	I	I
23-02	T	96	40	2.1E-03	6.0E-04	No	D	I
29-03	T	97	0	5.1E-04	5.0E-04	Yes	ND	ND
41-02	T	89	87	2.5E-03	2.3E-03	No	I	D
42-03	T	92	1	5.3E-04	5.0E-04	No	D	D
56-01	T	83	13	8.6E-04	5.0E-04	No	I	I

MAROS Statistical Trend Analysis Summary

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
VINYL CHLORIDE								
VINYL CHLORIDE								
07-01	T	96	1	5.3E-04	5.0E-04	No	D	D
16-03	T	84	0	5.4E-04	5.0E-04	Yes	ND	ND
18-03	S	96	11	1.5E-03	5.0E-04	No	I	I
19-03	T	86	0	5.4E-04	5.0E-04	Yes	ND	ND
21-03	T	106	0	6.9E-04	5.0E-04	Yes	ND	ND
23-02	T	96	10	1.7E-03	5.0E-04	No	I	I
29-03	T	97	0	5.4E-04	5.0E-04	Yes	ND	ND
41-02	T	89	0	5.4E-04	5.0E-04	Yes	ND	ND
42-03	T	92	0	5.7E-04	5.0E-04	Yes	ND	ND
56-01	T	83	0	5.8E-04	5.0E-04	Yes	ND	ND

Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

MAROS Statistical Trend Analysis Summary

Project: Mission Amb.; SZ4

User Name: DLG

Location: Santa Barbara

State: California

Time Period: 2/26/1999 to 7/15/2025

Consolidation Period: Quarterly

Consolidation Type: Median

Duplicate Consolidation: Maximum

ND Values: Detection Limit

J Flag Values : Actual Value

Well	Source/ Tail	Number of Samples	Number of Detects	Average Conc. (mg/L)	Median Conc. (mg/L)	All Samples "ND" ?	Mann- Kendall Trend	Linear Regression Trend
cis-1,2-DICHLOROETHYLENE								
06-03	T	63	0	5.1E-04	5.0E-04	Yes	ND	ND
15-03	S	59	0	5.1E-04	5.0E-04	Yes	ND	ND
36-04	T	24	0	5.9E-04	5.0E-04	Yes	ND	ND
TETRACHLOROETHYLENE(PCE)								
06-03	T	63	63	8.8E-03	7.1E-03	No	I	I
15-03	S	59	59	1.6E-02	1.7E-02	No	I	I
36-04	T	24	24	3.7E-02	3.7E-02	No	PI	NT
TRICHLOROETHYLENE (TCE)								
06-03	T	63	61	1.4E-03	1.2E-03	No	D	D
15-03	S	59	31	9.6E-04	8.0E-04	No	D	D
36-04	T	24	0	5.9E-04	5.0E-04	Yes	ND	ND
VINYL CHLORIDE								
06-03	T	63	0	5.1E-04	5.0E-04	Yes	ND	ND
15-03	S	59	0	5.1E-04	5.0E-04	Yes	ND	ND
36-04	T	24	0	5.9E-04	5.0E-04	Yes	ND	ND

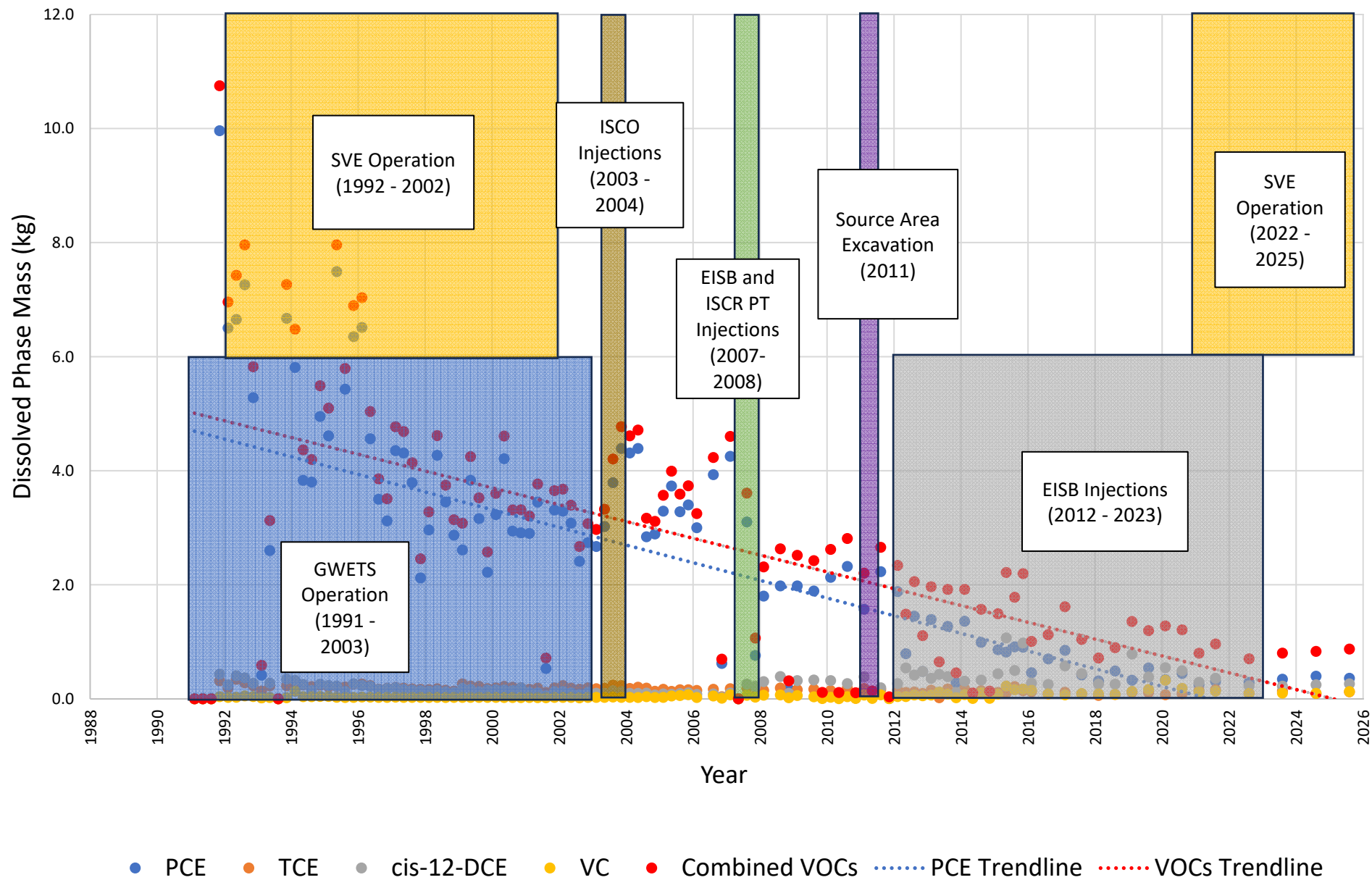
Note: Increasing (I); Probably Increasing (PI); Stable (S); Probably Decreasing (PD); Decreasing (D); No Trend (NT); Not Applicable (N/A); Not Applicable (N/A) - Due to insufficient Data (< 4 sampling events); No Detectable Concentration (NDC)

The Number of Samples and Number of Detects shown above are post-consolidation values.

ATTACHMENT 2

Closure Evaluation Figure 21 – Estimated Dissolved Mass (kg) Versus Time

Figure 21 - Estimated Dissolved Mass (kg) versus Time
SZ1, SZ2, and SZ3



PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

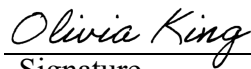
I am employed in the County of Santa Barbara, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 200 East Carrillo Street, Fourth Floor, Santa Barbara, California 93101.

On August 19, 2026, I served the foregoing document described as **MISSION LINEN SUPPLY'S PETITION FOR REVIEW AND REQUEST FOR STAY; DECLARATION OF DONALD W. MOORE IN SUPPORT OF REQUEST TO STAY REGIONAL BOARD'S ORDER; EXHIBITS** on all interested parties in this action by the original and/or true copy thereof enclosed in sealed envelopes, addressed as follows:

Daniel Pelikan
Greg Bishop
CENTRAL COAST REGIONAL WATER
QUALITY CONTROL BOARD
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
waterqualitypetitions@waterboards.ca.gov
centralcoast@waterboards.ca.gov
daniel.pelikan@waterboards.ca.gov
greg.bishop@waterboards.ca.gov

- ☐ BY MAIL: I placed the original and/or true copy in a sealed envelope addressed as indicated herein. I am readily familiar with the firm's practice of collection and processing documents for mailing. It is deposited with the U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☐ BY PERSONAL DELIVERY: I personally delivered the original and/or true copy in a sealed envelope addressed as indicated herein.
- ☒ BY E-MAIL: I caused to be e-mailed a true copy to the e-mail addresses listed herein.
- ☒ (**STATE**) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- ☐ (**FEDERAL**) I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on August 19, 2026, at Santa Barbara, California.



Signature
Olivia King