

TECHNICAL ANALYSIS

FOR

ADDEDNUM NO. 2

TO

CLEANUP AND ABATEMENT ORDER NO. R9-2005-0017

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

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

January 2007

STATE OF CALIFORNIA

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



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

Vacant, <i>Chair</i>	Water Quality
Jennifer Kraus, Vice Chair	Industrial Water Use
Richard Wright	County Government
David King	Recreation, Fish or Wildlife
Alan Barrett	Water Supply
Susan Ritschel	Municipal Government
Eric Anderson	Irrigated Agriculture
Daniel Johnson	Water Quality
Vacancy	Public

John H. Robertus, *Executive Officer*
Arthur L. Coe, *Assistant Executive Officer*

This report was prepared under the direction of

David T. Barker, **PE**, *Chief, Water Resource Protection Branch*
John Anderson, **PG**, *Senior Engineering Geologist*

by

Laurie Walsh, *Water Resource Control Engineer*

I. INTRODUCTION

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

Chlorinated hydrocarbon waste (tetrachloroethylene (PCE) and trichloroethylene (TCE)) was discharged to soil and ground water from the Lovett's One Hour Dry Cleaners. Efforts to assess the impacts to soil and ground water from this release of waste occurred between 1996 and 2006. A Feasibility Study and Remedial Action Plan were submitted to the Regional Board in compliance with CAO R9-2005-00017.

II. BACKGROUND

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

The responsible parties' consultant conducted further assessment in accordance with CAO R9-2005-0017. Assessment activities revealed a larger waste plume than was initially understood; therefore additional time to conduct further sampling was needed. In order to complete these activities, the responsible parties' consultant requested an extension to the Site Investigation and Characterization Report due date. The Regional Board Executive Officer granted the request. At the conclusion of site assessment activities, the responsible parties' consultant determined it necessary to conduct a pilot study to analyze one of the remedial alternatives being considered in the feasibility analysis, and collect additional ground water, soil, and soil gas data. In order to complete the pilot study, the responsible parties' consultant requested an extension to the due date for submittal of the Feasibility Study. The Regional Board Executive Officer granted the request. Accounting for the additional time needed to conduct a pilot test, gather additional soil, ground water, and soil gas data, and incorporate the pilot test results and the additional data into the Feasibility Study, the responsible parties' consultant identified a need to request an extension to the Remedial Action Plan report

due date as well as the commencement date for implementation of the chosen remedial action. Addendum No. 2 to CAO R9-2005-0017 addresses an extension to the Remedial Action Plan report due date and the due date for implementation of the preferred remedial action.

III. BASIS FOR FINDINGS IN ADDENDUM NO. 2 TO CAO R9-2005-0017

The text of each finding of Cleanup and Abatement Order Addendum No. 2 is presented below followed by a summary of the rationale and factual evidence supporting the finding.

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

Basis For Finding No. 1:

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

2. **REQUEST FOR EXTENSION TO FEASIBILITY STUDY DUE DATE.** Additional soil and groundwater sampling was required after completion of the initial site investigate work. In order to allow for completion of the additional actions, the responsible parties' consultant requested a 60-day extension of the Feasibility Study due date, June 9, 2006, prescribed in Directive No. C.1 of CAO R9-2005-0017. By letter dated June 15, 2006, the Regional Board Executive Officer granted the 60-day extension, establishing a new Feasibility Study due date of August 9, 2006. The Feasibility Study was submitted on August 9, 2006. Directive C.1 of CAO R9-2005-017 should be amended to reflect the extension granted by the Regional Board Executive Officer's June 15, 2006 letter.

Basis For Finding No. 2:

Pursuant to the June 8, 2006 letter prepared by BD Environmental for master tenant Norm La Caze of La Caze Escondido Partnership requesting extension to Feasibility Study Report due date.

3. **REQUEST FOR EXTENSION TO REMEDIAL ACTION PLAN DUE DATE.** The responsible parties' consultant requested a 100 day extension of the Remedial

Action Plan due date, August 9, 2006, prescribed in Directive No. D.1 of CAO R9-2005-0017 in order to complete a pilot study for one of the remedial alternatives being considered in the feasibility analysis. Since the pilot study includes growing bacterial cultures, additional time was needed to complete the study. The responsible parties' consultant submitted the Remedial Action Plan Report on November 27, 2006. Directive No. D.1 of CAO R9-2006-0017 should be amended to reflect the Remedial Action Plan Report due date extension of November 28, 2006.

Basis For Finding No. 3:

Pursuant to the July 26, 2006 letter prepared by BD Environmental for master tenant Norm La Caze of La Caze Escondido Partnership requesting extension to Remedial Action Plan Report due date.

4. **REQUEST FOR EXTENSION TO REMEDIAL ACTION PLAN**

IMPLEMENTATION DUE DATE A pilot test was initiated by the responsible parties' consultant to check the effectiveness of enhanced bioremediation on remediation of chlorinated solvents at the Lovett's One Hour Dry Cleaners site. Directive D. 2 of CAO R9-2005-017 requires implementation of the Remedial Action Plan (RAP) by October 9, 2006. The responsible parties' consultant requested the date for implementation of the RAP be extended to January 9, 2007 in order to complete the pilot testing, conduct the soil gas testing, and allow sufficient time for the Regional Board to review the RAP and newly collected data. Directive D.2 of CAO R9-2005-017 should be amended to extend the RAP implementation date from October 9, 2006 to January 9, 2007.

Basis For Finding No. 4:

Pursuant to the November 27, 2006 letter prepared by BD Environmental for master tenant Norm La Caze of La Caze Escondido Partnership requesting extension to Remedial Action Plan implementation due date.

This concludes the Technical Analysis Report.