

California Regional Water Quality Control Board
North Coast Region

CLEANUP AND ABATEMENT ORDER No. R1-2016-0040

For
Michael F. Gasparini
Allan A. Henderson
Paseo Vista, Inc.
and
Lloyd M. Fouche

Fouche Brothers Auto Wreckers
2290 Dutton Avenue
Santa Rosa, California

Sonoma County

The California Regional Water Quality Control Board, North Coast Region (hereinafter Regional Water Board), finds that:

BACKGROUND

1. The former Fouche Auto Wreckers site was located at 2290 Dutton Avenue, in Santa Rosa, Sonoma County, California. The property is comprised of three parcels (herein the Site) which are identified by Sonoma County Assessor's Parcel Nos. APN 043-041-001, 043-041-046, and 125-501-007, consisting of approximately 12.2 acres. The Site is currently owned by Paseo Vista, Inc.
2. The Fouche family had reportedly operated an auto wrecking yard at the Site since the late 1940s. The Fouche family auto wrecking business was called Fouche Brothers Auto Wreckers. Family members who were named individually and as partners in the Fouche Brothers Auto Wreckers business are James A. Fouche, Fannie M. Fouche, Lloyd M. Fouche, Leon O. Fouche, and Robert L. Fouche. Auto wrecking activities reportedly ceased at the Site in 2000 or 2001.
3. The Site was transferred to Michael F Gasparini and Allan A Henderson from James A Fouche on July 15, 2004. At the time of transfer, the Fouches had owned the Site for 62 years, having first purchased it in 1942. James A. Fouche has since passed away.
4. The Site was transferred from Michael F Gasparini and Allan A Henderson to Paseo Vista, Inc. on or about December 26, 2012. Paseo Vista Inc. is a corporation formed by Mr. Gasparini and Mr. Henderson. Michael F Gasparini, Allan A Henderson, Paseo Vista Inc., and all surviving members of the Fouche family involved with the former Fouche Brothers Auto Wrecking business are named as the Dischargers.

BASIS OF THIS ORDER

5. Prior Regional Board inspections from 1985, 1989, 1991 and 2000 noted the improper handling and disposal of hazardous materials. The Fouche Brothers Auto Wrecking business allowed waste to leak from vehicles onto the unpaved ground. The vehicle

dismantling and crushing performed at the Site resulted in the discharge of waste oil, gasoline, and lead batteries to soil. Soil and sludge samples collected from various operational locations, including the car crusher, contained levels of total petroleum hydrocarbons up to 25% and lead up to 860 mg/kg. Source areas of discharge were identified which included, three car crushing locations, a chemical storage area, a battery pit and battery plate area, a drum storage area, a gas tank storage area, waste oil puddles, and the shop/office area. The discharge of solvents to soil and groundwater was documented along with the presence of elevated levels of metals, including lead and zinc, in the soil.

6. Groundwater monitoring conducted between 2005 and 2015 revealed detectable levels of trichloroethene, 1,1,1-trichloroethane, 1,1-dichloroethane, 1,1 dichloroethene, and Freon 11. Groundwater monitoring conducted in 2014 and 2015 indicates that contaminants in on-site groundwater have decreased significantly to levels near and below water quality objectives. The primary concern is soil contamination, which has the potential to pollute groundwater. Elevated levels of TPH-motor oil (up to 1,800 mg/kg in 2005) and lead (up to 16,000 mg/kg in 2004) have been detected in the soil on Site. The presence of auto wrecking debris and elevated levels of TPH-motor oil and lead in soil, in particular, have caused and permitted and threaten to cause or permit waste to be discharged where it is or probably will discharge to groundwater and creates or threatens to create a condition of pollution or nuisance.
7. From approximately 2001 to 2006, wrecked cars, buildings, and auto wrecking debris were removed from the Site. In addition, soil was sampled across the entire Site and soil remediation (removal) was performed.
8. On February 17, 2015, the Regional Water Board approved a final cleanup remedy dated February 6, 2013, and modifications to the final cleanup remedy dated July 2014. The final cleanup remedy for soil consists of soil removal actions completed prior to 2015 and soil removal actions to be completed during site development. The final cleanup remedy for groundwater requires monitoring to verify the natural attenuation of site constituents in groundwater.
9. Mr. Henderson and Mr. Gasparini applied to Sonoma County to develop the Site with townhomes and apartments as the Paseo Vista subdivision. Sonoma County approved a rough grading permit and Phase I development work began in October 2015. During an October 22, 2015, inspection by Regional Water Board staff, auto wrecking debris, including metal, glass, springs, clamps, and rubber tubing, was scattered throughout surface soils.
10. In October 2015, elevated levels of TPH-motor oil (up to 280 mg/kg) and lead (up to 130 mg/kg) were detected in soil from previously remediated areas of the Site. These results verified the need for additional cleanup. Soil contamination and debris pose a nuisance and potential human health risk to future residents and users of the Paseo Vista subdivision. Therefore, additional soil testing, soil and debris removal actions, a human health risk assessment and, potentially, institutional controls are needed to ensure protection of human health for future residents and users of the subdivision.

11. From March to June 2016, the Dischargers submitted plans to comply with the final cleanup remedy for soil. These plans present a process for additional soil testing and removal during development of the Paseo Vista subdivision. These plans are a March 18, 2016, "Confirmation Soil Sampling and Screening Plan (Revised)", which the Regional Water Board approved on March 23, 2016; a May 6, 2016, "Revised Soil and Groundwater Management Plan", approved on May 19, 2016; and a June 22, 2016 "Stockpile Soil Sampling and Screening Plan", approved on June 27, 2016.
12. This Order requires the Dischargers to clean up and abate the effects of the discharges of auto wrecking debris and discharges into soil and groundwater and the threat of discharges that create or threaten to create a condition of pollution or nuisance.

LEGAL AND REGULATORY AUTHORITY

13. This Order conforms to, and implements policies and requirements of, the Porter-Cologne Water Quality Control Act (Division 7, commencing with Water Code section 13000) including: (1) Water Code sections 13267 and 13304; (2) applicable state and federal regulations; (3) all applicable provisions of Statewide Water Quality Control Plans adopted by the State Water Resources Control Board (State Board) and the Water Quality Control Plan for the North Coast Region May 2011, (hereafter "Basin Plan") adopted by the Regional Board; (4) State Board policies and regulations, including State Board Resolution No. 68-16 (Statement of Policy with Respect to Maintaining High Quality of Waters in California), and Resolution No. 92-49 (Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code section 13304) ("Resolution 92-49"); CCR Title 23, Section 3890 et. seq., and (5) relevant standards, criteria, and advisories adopted by other state and federal agencies.
14. Beneficial Uses and Water Quality Objectives: The Water Quality Control Plan for the North Coast Region (Basin Plan) designates beneficial uses, establishes water quality objectives, contains implementation programs for achieving objectives, and incorporates by reference, plans and policies adopted by the State Water Resources Control Board. The beneficial uses of areal groundwater include domestic, municipal, agricultural, and industrial supply.
 - a) The Site is located within 100 feet of Colgan Creek, which is a tributary to the Laguna de Santa Rosa which flows into the Russian River. The existing and potential beneficial uses of the Laguna de Santa Rosa and the Lower Russian River Hydrologic Unit include: Municipal and Domestic Supply (MUN); Agricultural Supply (AGR); Industrial Service Supply (IND); Industrial Process Supply (PRO); Groundwater Recharge (GWR); Freshwater Replenishment (FRSH); Navigation (NAV); Hydropower Generation (POW); Water Contact Recreation (REC-1); Non-contact Water Recreation (REC-2); Commercial and Sport Fishing (COMM); Warm water Habitat (WARM); Cold Freshwater Habitat (COLD); Wildlife Habitat (WILD); Rare Threatened or Endangered Species (RARE); Migration of Aquatic Organisms (MIGR); Spawning, reproduction, and/or Early Development (SPWN); Shellfish Harvesting (SHELL); Estuarine Habitat (EST), and Aquaculture (AQUA). Beneficial uses of any specifically identified water body generally apply to all of its tributaries.

15. The State Water Board has adopted Resolution No. 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304* (Resolution No. 92-49). Resolution No. 92-49 sets forth the policies and procedures for investigation and cleanup and abatement of discharges under Water Code section 13304, and requires that cleanup levels be consistent with State Water Board Resolution No. 68-16, the *Statement of Policy with Respect to Maintaining High Quality Waters in California* (Resolution No. 68-16), which is included as Appendix 6 of the Basin Plan. Thus, Resolution No. 92-49 requires the waste to be cleaned up in a manner that promotes attainment of either background water quality, or the best water quality that is reasonable if background levels of water quality cannot be restored. Any alternative cleanup level to background must: (1) be consistent with the maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of such water; and (3) not result in water quality less than that prescribed in the Basin Plan and applicable Water Quality Control Plans and Policies of the State Water Board.
16. Water quality objectives in the Basin Plan are adopted to ensure protection of the beneficial uses of water. The most stringent water quality objectives for protection of all beneficial uses are selected as the protective water quality criteria. Alternative cleanup and abatement actions must evaluate the feasibility of, at a minimum: (1) cleanup to background levels, (2) cleanup to levels attainable through application of best practicable technology, and (3) cleanup to the level of water quality objectives for protection of beneficial uses. A table of applicable Water Quality Objectives for groundwater is incorporated in this Order as Attachment A.
17. Water Code section 13304(a) states, in relevant part:

Any person who has discharged or discharges waste into waters of this state in violation of any waste discharge requirements or other order to prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and causes, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts....Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.
18. "Pollution" is defined by Water Code section 13050, subdivision (l)(1) as, an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects either of the following: The waters for beneficial uses; Facilities which serve these beneficial uses.

19. "Nuisance" is defined by Water Code section 13050, subdivision (m) as anything which meets all of the following requirements:
 - (1) Is injurious to health, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property.
 - (2) Affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon individuals may be unequal.
 - (3) Occurs during, or as a result of, the treatment or disposal of wastes.
20. Technical Reports Required: Water Code section 13267(b) states, in relevant part: In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region ... shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.
21. The burden of preparing the reports required by this Order bear a direct relationship for the need for the reports and the benefits to be obtained from the reports. The technical reports required by this Order are necessary to assure compliance with this Order and to protect the waters of the state. The technical reports are further necessary to demonstrate that appropriate methods will be used to cleanup waste discharged to soil and groundwater and to ensure that cleanup complies with Basin Plan requirements. In accordance with Water Code section 13267(b) the findings in this Order provide the Dischargers with a written explanation with regard to the need for remedial action and reports and identifies the evidence that supports the requirement to implement clean up and abatement activities and submit the reports.
22. California Environmental Quality Act: Issuance of this Order is being taken for the protection of the environment and to enforce the laws and regulations administered by the Regional Board as such is exempt from provisions of the California Environmental Quality Act (CEQA) (Public Resources Code section 21000 et seq.) in accordance with California Code of Regulations, title 14, sections 15061(b)(3), 15306, 15307, 15308, and 15321. This Order generally requires the Dischargers to submit plans and reports for approval during implementation of cleanup activities at the Site. Mere submittal of plans and reports is exempt from CEQA as submittal will not cause a direct or indirect physical change in the environment and/or is an activity that cannot possibly have a significant effect on the environment. To the extent that this Order requires activities to assure cleanup of contaminants for the protection of human health, this Order is exempt from provisions of CEQA pursuant to California Code of Regulations, title 14, section 15333. If the Regional Water Board determines that

implementation of any plan required by this Order will have a significant effect on the environment that is not otherwise exempt from CEQA, the Regional Water Board will conduct the necessary and appropriate environmental review prior to approval of the applicable plan. The Dischargers will bear the costs, including the Regional Water Board's costs, of determining whether implementation of any plan required by this Order will have a significant effect on the environment and, if so, in preparing and handling any documents necessary for environmental review. If necessary, the Dischargers and a consultant acceptable to the Regional Water Board shall enter into a memorandum of understanding with the Regional Water Board regarding such costs prior to undertaking any environmental review.

REQUIRED ACTIONS

IT IS HEREBY ORDERED that, pursuant to Water Code sections 13267 and 13304, Division 7, of the California Water Code, the Dischargers shall clean up and abate the discharge and threatened discharge and shall comply with the following provisions of this Order:

A. PROHIBITIONS

1. The discharge of wastes in a manner that will degrade surface water and groundwater quality or adversely affect beneficial uses of waters of the state is prohibited.
2. Activities associated with the investigation and cleanup that will cause further migration of wastes to surface water or groundwater are prohibited.

B. CLEANUP AND ABATEMENT TASKS

1. Within 30 days from the date of this Order, submit an implementation schedule, for review and approval by the Regional Water Board Executive Officer that provides dates for the commencement and completion of work required under Provisions B.2, B.3, and B.4 below. Changes to the implementation schedule are acceptable if approved in advance by the Regional Water Board Executive Officer. The Dischargers shall implement Provisions B.2, B.3, and B.4 according to the time schedules or time schedule changes approved by the Executive Officer.
2. Implement the March 18, 2016, "Confirmation Soil Sampling and Screening Plan (Revised)"; the May 6, 2016, "Revised Soil and Groundwater Management Plan"; and the June 22, 2016, "Stockpile Soil Sampling and Screening Plan" during each phase of development of the Paseo Vista Subdivision.
3. Within 60 days of completion of confirmation soil sampling, soil screening, and soil removal actions for each development phase of the Paseo Vista Subdivision, submit a report summarizing soil sampling and soil removal efforts. The summary report shall contain a site history, specific information on soil testing and soil removal work performed during each development phase, and maps showing sample locations and sample results for residential lots and public spaces.

4. Submit a human health risk assessment (HHRA) for each phase of the Paseo Vista Subdivision within 60 days of completion of confirmation soil sampling, soil screening, and soil removal actions for each development phase of the Paseo Vista Subdivision. The HHRA shall evaluate human health risk at the Paseo Vista Subdivision for all contaminants of concern in groundwater, soil vapor and soil. The HHRA shall provide an executive summary of health risks written for the layperson. The HHRA is subject to approval by the Regional Water Board Executive Officer and the Office of Environmental Health Hazard Assessment.
5. Within 90 days from the date of this Order, submit a sensitive receptor survey for review and approval by the Regional Water Board Executive Officer. The sensitive receptor survey shall contain a comprehensive list of all domestic wells identified near the Site (i.e., on properties adjacent to and across Dutton Avenue from the Site), a list of all previous domestic well sample results, and a map showing the location of identified domestic wells. The sensitive receptor survey shall contain a monitoring plan with a time schedule to sample domestic wells near the Site, including those discussed in Edd Clark & Associates July 31, 2014, "July 2014 Limited Sensitive Receptor Survey."
6. Within 30 days after Regional Water Board Executive Officer approval of the sensitive receptor survey, implement the plan to sample domestic wells near the Site. If any domestic water supply well is impacted by site contaminants, a plan for retesting the well and providing replacement water supply, in accordance with Section 13304 of the California Water Code, shall be submitted for Regional Water Board Executive Officer review within 30 days of testing the well. The replacement water supply plan shall be implemented immediately after Regional Water Board Executive Officer approval.
7. Within 150 days from the date of this Order, submit a report summarizing findings of the sensitive receptor survey including groundwater quality sampling results. The report shall estimate the time to meet groundwater quality objectives (Attachment A of this Order) both on and off-site. If groundwater quality objectives have not been met on and off-site, the report shall contain a plan to monitor groundwater for natural attenuation for review and approval by the Regional Water Board Executive Officer.
8. Within 30 days after the Regional Water Board Executive Officer approval of the monitored natural attenuation groundwater plan, implement the approved plan until all constituents monitored in groundwater both on and off-site have reached water quality objectives or are estimated to reach water quality objectives within a reasonable period of time.
9. A plan for the installation of additional monitoring wells will be required if the Regional Water Board Executive Officer determines that additional groundwater monitoring is necessary to demonstrate compliance with the approved natural attenuation groundwater cleanup remedy.
10. Comply with all mitigation measures identified in Sonoma County's Mitigated Negative Declaration that are within the Regional Water Board's jurisdiction. This includes wetland mitigation, soil and groundwater management plan implementation, pre and post storm water construction permitting, and low impact development requirements.

11. Submit a report that outlines compliance with all mitigation measures identified in Sonoma County's Mitigated Negative Declaration that are within the Regional Water Board's jurisdiction 60 days after completion of each phase of the Paseo Vista Subdivision.
12. Land use covenants (a.k.a. deed restrictions) for the Paseo Vista Subdivision will be required if contaminants are left behind under pavement above unrestricted concentrations that could cause human health exposures above de minimis levels. If the Regional Water Board Executive Officer determines that land use covenants are required, land use covenants acceptable to the Regional Water Board Executive Officer shall be emplaced prior to subdivision of the Site.
13. The Dischargers shall pay all cost recovery invoices from the State Water Resources Control Board within 30 days of issuance of the invoice.
14. Complete any additional work deemed reasonably necessary by the Regional Water Board's Executive Officer to abate and clean up the discharge of waste or threatened discharge of waste, restore water quality in groundwater, and protect the beneficial uses of surface and groundwater, human health and the environment.

GENERAL REQUIREMENTS AND NOTICES

1. **Duty to Use Qualified Professionals:** The Dischargers shall provide documentation that plans and reports required under this Order are prepared under the direction of appropriately qualified professionals. As required by the California Business and Professions Code sections 6735, 7835, and 7835.1, engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. The Dischargers shall include a statement of qualification and registration numbers, if applicable, of the responsible lead professionals in all plans and reports required under this Order. The lead professional shall sign and affix their registration stamp, as applicable, to the report, plan, or document.
2. **Signatory Requirements:** All technical reports submitted by the Dischargers shall include a cover letter signed by the Dischargers, or a duly authorized representative, certifying under penalty of law that the signer has examined and is familiar with the report and that to his or her knowledge, the report is true, complete, and accurate. The Dischargers shall also state if they agree with any recommendations/proposals and whether they approve implementation of said proposals. Any person signing a document submitted under this Order shall make the following certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my knowledge and on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

- 3. Cost Recovery:** Pursuant to Water Code section 13304, the North Coast Water Board is entitled to, and may seek reimbursement for, all reasonable costs it actually incurs to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. The Dischargers are enrolled in the State Water Board's Cost Recovery Program and shall reimburse the State of California for all reasonable costs actually incurred by the North Coast Water Board.
- 4. Notice of Change in Ownership or Occupancy:** The Dischargers shall file a written report on any changes in the Site's ownership or occupancy. This report shall be filed with the Regional Water Board no later than 30 days prior to a planned change and shall reference the number of this Order.
- 5. Submissions:** All deliverables required by this Order shall be submitted electronically to the State Water Resources Control Board's Geographic Environmental Information Management System database (GeoTracker) as required by Title 23, Division 3, Chapter 30 of the California Code of Regulations.
- 6. Other Regulatory Requirements:** The Dischargers shall obtain all applicable local, state, and federal permits prior to beginning any soil disturbance, soil remediation, or any other work required by this Order.
- 7. Delayed Compliance:** If for any reason, the Dischargers are unable to perform any activity or submit any document in compliance with the schedule set forth herein, or in compliance with any work schedule submitted pursuant to this Order and approved by the Executive Officer, the Dischargers may request, in writing, an extension of the time specified. The extension request shall include justification for the delay. Any extension request shall be submitted as soon as a delay is recognized and prior to the compliance date. An extension may be granted by revision of this Order or by a letter from the Executive Officer.
- 8. Potential Liability:** If the Dischargers fail to comply with the requirements of this Order, this matter may be referred to the Attorney General for judicial enforcement or may issue a complaint for administrative civil liability. Failure to comply with this Order may result in the assessment of administrative civil liability up to the following maximum liability amounts: \$1,000 per violation per day pursuant to Water Code section 13268, \$5,000 per violation per day pursuant to Water Code section 13350, and/or \$10,000 per violation per day pursuant to Water Code section 13385. The Regional Water Board reserves its right to take any enforcement actions authorized by law, including but not limited to, violation of the terms and condition of this Order.
- 9. No Limitation of Water Board Authority.** This Order in no way limits the authority of the Regional Water Board to institute additional enforcement actions or to require additional investigation and cleanup of the Site consistent with the Water Code. This Order may be revised as additional information becomes available.

10. Modifications. Any modification to this Order shall be in writing and approved by the Executive Officer of the Regional Water Board, including any potential extension requests.

11. Requesting Review by the State Water Board: Any person aggrieved by this or any final action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and Title 23, California Code of Regulations, section 2050 et al. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

or will be provided upon request.

This Order is effective upon the date of signature.

Matthias St. John
Executive Officer
September 7, 2016

**Groundwater Water Quality Objectives
for Cleanup Projects in the North Coast Region**

Typical Chlorinated Solvent Constituents of Concern

Constituent of Concern	Practical Quantitation Limit (µg/L)	Water Quality Objective¹ (µg/L)
Tetrachloroethene (PCE)	0.5	0.06 ²
Trichloroethene (TCE)	0.5	1.7 ²
cis-1,2-Dichloroethene (cis-1,2-DCE)	0.5	6 ³
trans-1,2-Dichloroethene (trans-1,2-DCE)	0.5	10 ³
Vinyl Chloride (chloroethene)	0.5	0.05 ²
1,1,1-Trichloroethane (1,1,1-TCA)	0.5	200 ³
1,1-Dichloroethane (1,1-DCA)	0.5	3 ²
1,1-Dichloroethene (1,1-DCE)	0.5	6 ³
Chloroethane	0.5	16 ⁴
1,4-Dioxane	0.5	1.3 ⁵
Carbon Tetrachloride	0.5	0.1 ²
Chloroform (trichloromethane)	0.5	1.8 ⁵
Dichloromethane (DCM)	0.5	4 ²

¹ Practical quantitation limits are based on current technology. For instances when technology cannot achieve the water quality objective the practical quantitation limit will be used.

² California Public Health Goal in Drinking Water (Office of Environmental Health Hazard Assessment), applied to the GROUNDWATER TOXICITY water quality objective in the Basin Plan.

³ California State Water Resources Control Board - Division of Drinking Water Maximum Contaminant Level, applied to the GROUNDWATER CHEMICAL CONSTITUENT water quality objective in the Basin Plan.

⁴ Published literature provides an odor threshold in air, converted to a water concentration through equilibrium distribution, applied to the narrative GROUNDWATER TASTE AND ODOR water quality objective of the Basin Plan.

⁵ Cal/EPA Cancer Potency Factor (as a drinking water level), applied to the GROUNDWATER TOXICITY water quality objective in the Basin Plan.