

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

CLEANUP AND ABATEMENT ORDER NO. R5-2004-0720

FOR

MS. SUSAN ST. CLAIR, MR. DANIEL MIRANDA, MR. DAN WALL,
MR. ELWOOD BOWMAN, MR. PETE BAKKER, MR. ED ALAHVERDI,
MOTHERSEL & BREHMER PROPERTIES, AND JOAQUIN CONSTRUCTION CO., INC.

FORMER ELWOOD'S DRY CLEANING SERVICE
MODESTO, STANISLAUS COUNTY

This Cleanup and Abatement Order (Order) is issued to Ms. Susan St. Clair, Mr. Daniel Miranda, Mr. Dan Wall, Mr. Elwood Bowman, Mr. Pete Bakker, Mr. Ed Alahverdi, Mothersel & Brehmer Properties, and Joaquin Construction Co., Inc. (hereafter collectively referred to as Discharger), based on provisions of California Water Code Section 13304, which authorizes the California Regional Water Quality Control Board, Central Valley Region (hereafter Regional Board) to issue a Cleanup and Abatement Order.

The Regional Board finds, with respect to the Dischargers' acts or failure to act, the following:

INTRODUCTION

1. A dry cleaning business known as Elwood's Dry Cleaning Service operated at 441 McHenry Avenue in Modesto, Stanislaus County until 1 September 2004. Prior to 1981, the dry cleaning business was located at 435 McHenry Avenue in Modesto. These two locations are hereafter collectively referred to as the Site. The two locations are in suites of the same retail building surrounded by commercial businesses with a residential area to the west. The Assessor's Parcel Number (APN) for the retail building is 110-003-081. Attachment 1, which is made part of this Order, shows the outline of the retail building, locations of adjacent businesses, sewer lines, and sampling locations.
2. Mr. Elwood Bowman started the dry cleaning business in 1946 or 1947, according to his 27 August 2001 deposition¹. Mr. Bowman began operation of the dry cleaning business at 435 McHenry Avenue and then moved the dry cleaning business to 441 McHenry Avenue in 1980 or 1981. Mr. Bowman owned the retail building that included the two locations. Mr. Bowman used tetrachloroethene (PCE) in the dry cleaning process at 435 McHenry Avenue. When Mr. Bowman moved the dry cleaning business to 441 McHenry Avenue, he purchased the existing dry cleaning equipment from Mr. Pete Bakker, who used PCE. Mr. Bowman sold the retail building in 1974 to Mr. Bakker, but continued to operate the dry cleaning business at 441 McHenry Avenue, and in May 2000 he sold the dry cleaning business to Mr. Ed Alahverdi.
3. Mr. Bakker bought the retail building in 1974 and operated a shirt laundry business at 441 McHenry Avenue. From 1974 to about 1978, no PCE was used at 441 McHenry Avenue. In about 1978, Mr. Bakker purchased and used dry cleaning equipment that utilized PCE in the cleaning process. Mr. Bakker sold the retail building to Mothersel & Brehmer Properties in 1980.

¹ Mr. Bowman's deposition was taken under oath in the matter of City of Modesto and City of Modesto Sewer District No. 1 vs. The Dow Chemical Company; PPG Industries, Inc.; Vulcan Materials Company; E.I. DuPont de Nemours and Company; R.R. Street & Co., Inc.; M.B.L., Inc.; Washex Machinery of California, Inc.; Acme Cleaners; Modernistic Cleaners; Modesto Steam Laundry & Cleaners, Inc.; Saw-on Machinery Company, Inc.; and DOEs 1 through 1,000, inclusive.

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4. In April 1989, Joaquin Construction Company purchased the retail building from Mothersel & Brehmer Properties and in the same month, sold the retail building to Ms. Susan St. Clair. Ms. St. Clair is the current property owner.
5. Mr. Ed Alahverdi purchased the dry cleaning business from Mr. Bowman in May 2000. In September 2001 he sold the dry cleaning business to Mr. Dan Wall.
6. Mr. Wall operated the dry cleaning business from September 2001 to June of 2002. He sold the dry cleaning business to Mr. Daniel Miranda.
7. Daniel Miranda purchased the dry cleaning business on 1 June 2002. Mr. Miranda operated the dry cleaning equipment at 441 McHenry Avenue until 23 November 2002. From 23 November 2002 until 1 September 2004, the business at 441 McHenry Avenue was used as a drop-off location.
8. Since 1 September 2004, a new dry cleaning business has leased 441 McHenry Avenue and uses PCE in the dry cleaning operations. Regional Board and Stanislaus County Department of Environmental Resources (SCDER) observed and inspected the new operations. No violations or releases were noted. There are no known potential sources of PCE at or around the Site other than the current operator and the former Elwood's Dry Cleaning Service at 435 and 441 McHenry Avenue.

BACKGROUND

9. On 13 June 1991, the City of Modesto obtained sewer samples at or near the Site. Upstream of the Site PCE was less than 1.0 microgram per liter ($\mu\text{g/l}$), downstream of the Site PCE was 15.2 $\mu\text{g/l}$, the sewer main had 19.0 $\mu\text{g/l}$ of PCE, and the flushed main had 2,390 $\mu\text{g/l}$ of PCE.
10. In 1991, Regional Board staff conducted an investigation near various dry cleaning sites, including Elwood's Dry Cleaning Service. Their investigations were summarized in a letter to the City of Modesto dated 7 January 1992. The investigation indicated that wastewater from the cooker, reclaimer, and sniffer, and cooling water were all discharged to the sewer at Elwood's Dry Cleaning Service. Samples of the cooling water and reclaimer wastewater showed concentrations of 14 $\mu\text{g/l}$ and 53,618 $\mu\text{g/l}$ of unspecified volatile organic compounds, respectively.
11. On 12 November 2002, the SCDER contacted Regional Board staff regarding detections of PCE during investigation activities for 7-Eleven Store #21154 (7-Eleven) at 505 McHenry Avenue in Modesto. SCDER is overseeing the investigation activities at 7-Eleven due to petroleum pollution from a leaking underground storage tank. There is no evidence that dry cleaning operations occurred at the 7-Eleven site. The Site is about 100 feet south of 7-Eleven.
12. In 2001, soil gas samples were collected at and around the Site. Concentrations of unspecified volatile organic compounds in soil were up to 12,000 micrograms per cubic meter ($\mu\text{g/m}^3$).

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13. There are two monitoring wells adjacent to the Site. Monitoring well MW-5 is located to the east of the Site and has PCE in groundwater at concentrations up to 5,300 µg/l. Monitoring well MW-9 is to the northwest of the Site and has PCE in groundwater at concentrations up to 390 µg/l. A grab groundwater sample collected adjacent to the east side of the building near 435 McHenry Avenue detected PCE at 4,500 µg/l in April 2002.
14. In June 2003, a soil gas sample collected near 433 McHenry Avenue had a reading of 53,000,000 µg/m³. Five other readings in the area during the June 2003 had readings at or above 1,000,000 µg/m³. Such high concentrations indicate the presence of dense non-aqueous phase liquid.
15. Regional Board staff has sent three letters (26 November 2002, 19 May 2003, and 23 July 2003) requesting information on current and former property owners and dry cleaning operators of the Site and the submittal of a work plan to conduct an investigation of the PCE pollution. Mr. Miranda and Mr. Bakker have provided additional operator and ownership history.

AUTHORITY – LEGAL REQUIREMENTS

16. The Regional Board’s *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, Fourth Edition* (hereafter Basin Plan) designates beneficial uses of the waters of the State, establishes water quality objectives (WQOs) to protect these uses, and establishes implementation policies to implement WQOs. The beneficial uses of the groundwater beneath the Site are domestic, municipal, industrial, and agricultural supply.
17. The wastes detected at the Site are solvents used in the dry cleaning process and breakdown products that are not naturally occurring, and some are known human carcinogens. Pollution of groundwater with these constituents impairs the beneficial uses of the groundwater.
18. WQOs listed in the Basin Plan include numeric WQOs, e.g., state drinking water maximum contaminant levels (MCL) that are incorporated by reference, and narrative WQOs, including the narrative toxicity objective and the narrative tastes and odors objective for surface and groundwater. Chapter IV of the Basin Plan contains the *Policy for Application of Water Quality Objectives*, which provides that “[w]here compliance with narrative objectives is required (i.e., where the objectives are applicable to protect specified beneficial uses), the Regional Board will, on a case-by-case basis, adopt numerical limitations in orders which will implement the narrative objectives.” The numerical limits for the constituents of concern listed in the following table implement the Basin Plan WQOs.

Constituent	Limits	WQO	Reference
Tetrachloroethene	0.06 µg/L	Narrative Toxicity	California Public Health Goal in Drinking Water – Office of Environmental Health Hazard Assessment
	5.0 µg/L	California Primary MCL	CCR Title 22, Section 64444 California Department of Health Services
Trichloroethene	0.8 µg/L	Narrative Toxicity	California Public Health Goal in Drinking Water – Office of Environmental Health Hazard Assessment.
	5.0 µg/L	California Primary MCL	CCR Title 22, Section 64444 California Department of Health Services

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19. The constituents listed in Finding No. 18 are wastes, as defined in the Water Code, Section 13050.
20. The groundwater exceeds the WQOs for the constituents listed in Finding No. 18. The exceedance of applicable WQOs in the Basin Plan constitutes pollution as defined in Water Code section 13050. The Discharger has caused or permitted waste to be discharged or deposited where it has discharged to waters of the state and has created, and continues to threaten to create, a condition of pollution or nuisance.
21. The State Water Resources Control Board (hereafter State Board) has adopted Resolution No. 92-49, the *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304*. This Policy sets forth the policies and procedures to be used during an investigation or cleanup of a polluted site and requires that cleanup levels be consistent with State Board Resolution 68-16, the *Statement of Policy With Respect to Maintaining High Quality of Waters in California*. Resolution 92-49 and the Basin Plan establish the cleanup levels to be achieved. Resolution 92-49 requires the waste to be cleaned up to background, or if that is not reasonable, to an alternative level that is the most stringent level that is economically and technologically feasible in accordance with Title 23, California Code of Regulations (CCR) Section 2550.4. 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 Board.
22. Chapter IV of the Basin Plan contains the *Policy for Investigation and Cleanup of Contaminated Sites*, which describes the Regional Board's policy for managing contaminated sites. This strategy is based on Water Code Sections 13000 and 13304, the Title 27 CCR, Division 2, Subdivision 1 regulations, and State Board Resolution Nos. 68-16 and 92-49. The Policy addresses site investigation, source removal or containment, information required to be submitted for consideration in establishing cleanup levels, and the bases for establishment of soil and groundwater cleanup levels.
23. The State Board's *Water Quality Enforcement Policy*, states in part: "At a minimum, cleanup levels must be sufficiently stringent to fully support beneficial uses, unless the Regional Board allows a containment zone. In the interim, and if restoration of background water quality cannot be achieved, the Order should require the discharger(s) to abate the effects of the discharge. Abatement activities may include the provision of alternate water supplies." (Enforcement Policy, p. 19.)
24. Section 13304(a) of the California Water Code provides that:

"Any person who has discharged or discharges waste into waters of the state in violation of any waste discharge requirements or other order or 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 creates, 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

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any person to comply with the cleanup or abatement order, the Attorney General, at the request of the regional 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.”

25. Section 13267(b) of the California Water Code provides that:

“(1) 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, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters 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.”

The technical reports required by this Order are necessary to assure compliance with Section 13304 of the California Water Code. Existing data and information about the Site indicates that waste has been discharged or is discharging at the property, which is owned or operated, or formerly owned or operated by the Discharger named in this Order.

26. Section 13304(c)(1) of the California Water Code provides that:

“ . . . the person or persons who discharged the waste, discharges the waste, or threatened to cause or permit the discharge of the waste within the meaning of subdivision (a), are liable to that government agency to the extent of the reasonable costs actually incurred in cleaning up the waste, abating the effects of the waste, supervising cleanup or abatement activities, or taking other remedial actions. . . ”

27. Based on the Findings in the Order, Ms. Susan St. Clair, Mr. Daniel Miranda, Mr. Dan Wall, Mr. Elwood Bowman, Mr. Pete Bakker, Mr. Ed Alahverdi, Mothersel & Brehmer Properties, and Joaquin Construction Co., Inc. as the operator and/or owner of the former Elwood's Dry Cleaning Service and/or owner of the APN 110-003-081, caused or permitted waste to be discharged to waters of the state where it has created and threatens to create a condition of pollution or nuisance. Mr. Elwood Bowman, Mr. Pete Bakker, Mr. Ed Alahverdi, Mr. Dan Wall, and Mr. Daniel Miranda all operated dry cleaning business at the Site and discharged PCE and other waste constituents into the sewer from which it discharged to waters of the state. Mr. Elwood Bowman, Mr. Pete Bakker, Ms. Susan St. Clair, Mothersel & Brehmer Properties, and Joaquin Construction Co. , Inc. all owned the property at the time that PCE was discharged to waters of the state.

28. If the Discharger fails to comply with this Order, the Executive Officer may request the Attorney General to petition the superior court for the issuance of an injunction.

29. If the Discharger violates this Order, then the Discharger may be liable civilly in a monetary amount provided by the California Water Code.

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30. The issuance of this Order is an enforcement action taken by a regulatory agency and is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et seq.) (CEQA), pursuant to Title 14 CCR Section 15321(a)(2). The implementation of this Order is also an action to assure the restoration of the environment and is exempt from CEQA in accordance with Title 14 CCR, Sections 15308 and 15330.
31. Any person affected by this action of the Regional Board may petition the State Board to review the action in accordance with Title 23 CCR Sections 2050-2068. The regulations may be provided upon request and are available at www.swrcb.ca.gov. The State Board must receive the petition within 30 days of the date of this Order. The filing of a petition has no immediate effect. The Order, including all tasks and deadlines, continue in full force and effect.

REQUIRED ACTIONS

IT IS HEREBY ORDERED that, pursuant to Section 13300, Section 13304 and Section 13267 of the California Water Code, Ms. Susan St. Clair, Mr. Daniel Miranda, Mr. Dan Wall, Mr. Elwood Bowman, Mr. Pete Bakker, Mr. Ed Alahverdi, Mothersel & Brehmer Properties, and Joaquin Construction Co., Inc. shall:

1. Investigate the discharges of waste, clean up the waste, and abate the effects of the waste, forthwith, resulting from activities at 435 and 441 McHenry Avenue in Modesto, in conformance with State Board Resolution No. 92-49 *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304* and with the Regional Board's *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* (in particular the Policies and Plans listed within the Control Action Considerations portion of Chapter IV). "Forthwith" means as soon as is reasonably possible. Compliance with this requirement shall include, but not be limited to, completing the tasks listed below.

WATER SUPPLY WELL SURVEY

2. By **28 January 2005**, submit the results of a water supply well survey within one-half mile of the site and a sampling plan to sample any water supply well(s) threatened to be polluted by waste originating from the Site. The sampling plan shall include specific actions and a commitment by the Discharger to implement the sampling plan, including obtaining any necessary agreements.
3. Within **30 days** of Regional Board staff concurrence with the water supply well sampling plan, but no later than **1 April 2005**, implement the sampling plan and submit the sampling results in accordance with the approved time schedule, which shall become part of this Order.
4. Within **30 days** of Regional Board staff notifying the Discharger that an alternate water supply is necessary, submit a work plan and schedule to provide an in-kind replacement for the specified water supply. The Discharger shall implement the work plan in accordance with an approved time schedule, which shall become part of this Order.

SITE ASSESSMENT

5. By **25 February 2005**, submit a *Site Assessment Work Plan* to collect a sufficient number of soil and groundwater samples to determine the lateral and vertical extent of waste, including PCE, for a complete site characterization. The work plan shall contain the information in Attachment 2, which is made part of this Order.
6. Within **30 days** of staff concurrence with the *Site Assessment Work Plan*, but no later than **6 May 2005**, implement the work plan in accordance with the approved time schedule, which shall become part of this Order.
7. Submit a *Site Assessment Report* for groundwater in the accordance with the approved time schedule, but no later than **26 August 2005**. The *Site Assessment Report* shall contain the information in Attachment 3, which is made part of this Order, and include recommendations and a work plan for additional investigation, if needed. The work plan for additional investigation shall contain information in Attachment 2, including a sufficient number of sampling points and wells to determine the vertical and lateral extent of pollutants. In no additional investigation is needed, this shall be the *Final Site Assessment Report*.
8. Within **30 days** of staff concurrence with the work plan for additional site assessment, implement the work plan and submit a *Site Assessment Report*, which contains the information in Attachment 3, in accordance with the approved time schedule, which shall become part of this Order.

PUBLIC PARTICIPATION

9. By **11 February 2005**, submit a *Public Participation Plan*. The *Public Participation Plan* shall include, but not be limited to, a community profile, public meetings at appropriate milestones in the cleanup (as required by Regional Board staff), public notification of field activities, regular mailing of fact sheets to interested persons, and maintaining a public library repository of all documents associated with the Site.

HEALTH RISK ASSESSMENT

10. By **6 June 2005**, submit a work plan and time schedule to prepare a *Health Risk Assessment* (HRA). The work plan for the HRA and the HRA shall be prepared in accordance with the Department of Toxic Substances Control and U.S. EPA guidance and contain the detail and clarity necessary for a lay person from the general public to follow the process and duplicate calculations. Inhalation of the volatile components of the waste (e.g., halogenated and aromatic solvents) must be considered an exposure pathway.
11. Within **30 days** of Regional Board concurrence with the work plan for the HRA, but no later than **12 August 2005**, implement the work plan and submit a draft HRA in accordance with the approved time schedule, which shall become part of this Order.
12. Within **45 days** of receiving comments from Regional Board staff on the draft HRA, append agency comments and the Discharger's responses to these comments to a revised draft HRA,

submit to the Regional Board and distribute to interested persons the *Draft for Public Comment HRA*. The public comment period shall extend for 45 days.

13. Within **30 days** of the end of the public comment period, submit and distribute to interested parties a final HRA with an appendix that contains responses to all public comments.

FEASIBILITY STUDY AND CLEANUP

14. Within **120 days** of staff concurrence with the *Final Site Assessment Report*, submit a *Feasibility Study/Remedial Options Evaluation Report* for soil and groundwater remediation. The report shall contain the information in Attachment 4, which is made part of this Order. The proposed preferred alternative for groundwater must meet the range of cleanup levels as described in the Basin Plan Policy for Investigation and Cleanup of Contaminated Sites and Resolution No. 92-49. The Discharger shall attempt to clean up each constituent to background concentrations, or to the lowest level that is technically and economically achievable and which complies with all applicable WQOs of the Basin Plan and promulgated water quality criteria.
15. Within **60 days** of staff concurrence with the *Feasibility Study/Remedial Options Evaluation Report* for soil and groundwater cleanup, submit a *Cleanup Plan*, which describes the preferred alternative(s) for cleanup and includes a time schedule to conduct the cleanup activities. The approved time schedule to implement the cleanup shall become a part of this Order.
16. Within **60 days** of Executive Officer approval of the *Cleanup Plan* for soil and groundwater, commence cleanup or installation of the cleanup system. The Discharger shall notify staff a minimum of 72 hours prior to beginning fieldwork.
17. Within **120 days** of Executive Officer approval of the *Cleanup Plan*, submit a report describing the status and results of the cleanup work (*Cleanup Implementation Report*). The report shall clearly show whether the installation of any cleanup system is complete, and if not, give a schedule and proposed work plan for installation of the remaining cleanup activities, including a proposed monitoring plan.

GROUNDWATER MONITORING

18. Comply with any monitoring and reporting program issued by the Executive Officer.

GENERAL REQUIREMENTS

19. Reimburse the Regional Board for reasonable costs associated with oversight of the cleanup of this facility. By **14 January 2005**, provide the name and address where the invoices shall be sent. Failure to provide a name and address for invoices and/or failure to reimburse the Regional Board's reasonable oversight costs shall be considered a violation of this Order.
20. Conduct work only after Regional Board staff concur with work plans.
21. Submit all reports with a cover letter signed by the Discharger.

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22. Fourteen days prior to conducting any field work, submit a Health and Safety Plan that is adequate to ensure worker and public safety during the field activities in accordance with CCR Title 8, Section 5192.
23. As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, have appropriate reports prepared by, or under the supervision of, a registered professional engineer or geologist and signed by the registered professional. All technical reports submitted by the Discharger shall include a statement signed by the authorized representative certifying under penalty of law that the representative has examined and is familiar with the report and that to his knowledge, the report is true, complete, and accurate.
24. Upon startup of any remediation system(s), operate the remediation system(s) continuously, except for periodic and required maintenance or unpreventable equipment failure. The Discharger shall notify the Regional Board within 24 hours of any unscheduled shutdown of the remediation system(s) that lasts longer than 48 hours. This notification shall include the cause of the shutdown and the corrective action taken (or proposed to be taken) to restart the system. Any interruptions in the operation of the remediation system(s), other than for maintenance, emergencies, or equipment failure, without prior approval from Regional Board staff or without notifying the Regional Board within the specified time is a violation of this Order.
25. Optimize remedial systems as needed to improve system efficiency, operating time, and/or pollutant removal rates, and report on the effectiveness of the optimization in the Annual Report.
26. Notify Regional Board staff at least three working days prior to any onsite work, testing, or sampling that pertains to environmental remediation and investigation and is not routine monitoring, maintenance, or inspection.
27. Obtain all local and state permits and access agreements necessary to fulfill the requirements of this Order prior to beginning the work.
28. Continue any remediation or monitoring activities until such time as the Executive Officer determines that sufficient cleanup has been accomplished to fully comply with this Order and this Order has been rescinded.
29. If, for any reason, the Discharger is 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 Discharger may request, in writing, an extension of the time specified. The extension request shall include justification for the delay. An extension may be granted by revision of this Order or by a letter from the Executive Officer.
30. If, in the opinion of the Executive Officer, the Discharger fails to comply with the provisions of this Order, the Executive Officer may refer this matter to the Attorney General for judicial enforcement or may issue a complaint for administrative civil liability.

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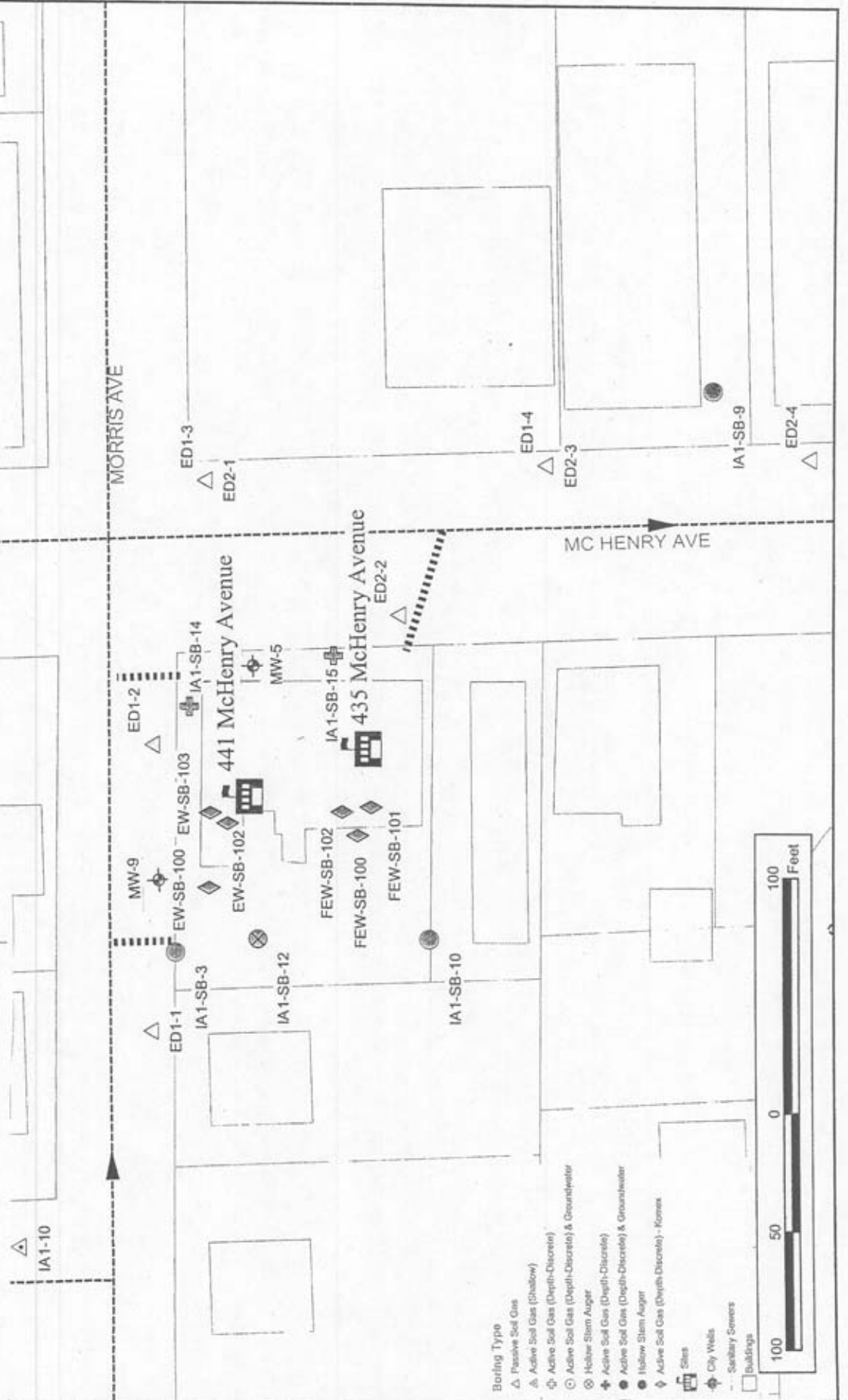
This Order is effective upon the date of signature.

THOMAS R. PINKOS, Executive Officer

9 December 2004

(Date)

ATTACHMENT 1
 ORDER NO. R5-2004-0720
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 441 MCHENRY AVENUE
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- Boring Type**
- △ Passive Soil Gas
 - ▲ Active Soil Gas (Shallow)
 - ⊕ Active Soil Gas (Depth-Discrete)
 - ⊙ Active Soil Gas (Depth-Discrete) & Groundwater
 - ⊗ Hollow Stem Auger
 - ⊕ Active Soil Gas (Depth-Discrete)
 - Active Soil Gas (Depth-Discrete) & Groundwater
 - ⊖ Hollow Stem Auger
 - ⊙ Active Soil Gas (Depth-Discrete) - Komex
- Sites**
- City Wells
 - Sanitary Covers
 - Buildings