

---

## CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

8 June 2021

Mr. Todd Oliver  
Preserve West Capitol  
411 Borel Avenue, Suite 650  
San Mateo, CA 94402

### **NOTICE OF APPLICABILITY OF GENERAL ORDER NO. R5-2015-0012-069, FORMER HUGGINS DRY CLEANERS, 1347 FLORIN ROAD, SACRAMENTO, SACRAMENTO COUNTY**

Risk-Based Decisions, Inc. submitted on your behalf, a Notice of Intent (NOI) dated the 15<sup>th</sup> of May, 2020 and the *Workplan for In Situ Oxidation, Former Huggins Dry Cleaners, 1347 Florin Road, Sacramento, California* (Work Plan), dated 3 June 2020, requesting coverage under Order No. R5-2015-0012, *Waste Discharge Requirements General Order for In-Situ Groundwater Remediation and Discharge of Treated Groundwater to Land* (General Order). Following review and additional discussion, an addendum dated 18 November 2020 was submitted, modifying the original work plan and expanding the proposed treatment area to include the former Paul's Cleaners. Following additional agency and public comments a final work plan and addendum were submitted dated 31 March 2021. Based on information in these submittals, it is our determination that this project meets the required conditions to be covered under General Order No. R5-2015-0012. All the requirements contained in the general order are applicable to this project. The project is assigned Order No. R5-2015-0012-069.

#### **Project Location:**

The project is located at 1347 Florin Road in the City of Sacramento, Sacramento County, Latitude 38° 29' 46.8126" N, Longitude 121° 30' 29.988" W, Assessor's Parcel Numbers 029-0470-010, 029-0470-019, and 029-0470-020.

#### **Project Description:**

Operations at the Former Huggins Dry Cleaners and Former Paul's Cleaners in the City and County of Sacramento (Site) caused pollution of soil and groundwater. The primary constituent of concern in groundwater is tetrachloroethene (PCE). Depth to groundwater in December 2020 was approximately 16 feet below ground surface.

Remediation of PCE in soil and groundwater at the Site was initiated in 2011. A soil vapor extraction system has been operating since 2010 and a groundwater extraction and treatment system since 2015. Operation of these remedial systems has reduced

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

the concentration of PCE in soil and groundwater by orders of magnitude. However, residual PCE concentrations in groundwater are still above groundwater water quality objectives. Additionally, releases along a sewer line in the vicinity of the former Paul's Cleaners have been identified outside the radius of influence of existing treatment systems.

In order to expedite groundwater cleanup time to meet water quality objectives, the current Site owner (Discharger) is proposing to conduct a pilot study for treatment of PCE and other VOCs in groundwater using in-situ chemical oxidation. The Discharger proposes to inject potassium permanganate into groundwater at a target concentration of potassium permanganate in groundwater of 0.05% by mass in the vicinity of the former Huggins cleaners, and 0.2%-0.6% in the vicinity of the sewer line release near the former Paul's Cleaners. The total volume and mass of potassium permanganate will be determined based on the results of field testing as part of the Work Plan. The potassium permanganate will be injected by gravity flow, and the existing groundwater extraction and treatment system will continue to be operated to promote contact of the injected potassium permanganate with PCE in groundwater.

As part of this Order, groundwater monitoring will be performed in accordance with the attached Monitoring and Reporting Program (MRP) to confirm injection of potassium permanganate is not adversely impacting groundwater quality and to monitor progress of the remedy.

The Discharger circulated a fact sheet describing the project and soliciting input from the public. Comments received during the 30-day public comment period were concerned with the site history and dry cleaner operations and were not substantive with regard to the proposed pilot study or coverage under the General Order.

**General Information:**

1. The project will be operated in accordance with the requirements contained in the General Order No. R5-2015-0012 and in accordance with the information submitted in the Work Plan, Notice of Intent, and specified in this Notice of Applicability.
2. The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until this Notice of Applicability is officially revoked.
3. Injection of materials other than potassium permanganate and tap water into the subsurface is prohibited.
4. The General Order requires a contingency plan for corrective actions should water quality exceed the requirements of the Order at the points of compliance. The General Order prohibits concentrations of metals, total dissolved solids, or electrical conductivity more than 20% greater than their respective baseline levels. As a contingency plan, the Discharger will implement one or more of the corrective action measures outlined in the Work Plan and as deemed necessary

by the Central Valley Water Board, including operation of the groundwater extraction system to capture any byproducts of the injections.

5. Failure to abide by the conditions of the General Order could result in an enforcement action as authorized by provisions of the California Water Code.
6. The Discharger shall comply with the attached Monitoring and Reporting Program, Order No. R5-2015-0012-069, and any revisions thereto as ordered by the Executive Officer.

If you have any questions regarding this matter, you may contact Durin Linderholm by telephone at (916) 464-4657 or by email at [Durin.Linderholm@waterboards.ca.gov](mailto:Durin.Linderholm@waterboards.ca.gov).



PATRICK PULUPA  
Executive Officer

Attachments: Monitoring and Reporting Program Order No. R5-2015-0012-069

cc: (via email)

- Mr. Jim Meier, Risk-Based Decisions, Inc. Sacramento, CA
- Mr. Rob Pexton, Risk-Based Decisions, Inc. Sacramento, CA
- Mr. Ijaz Jamall, Risk-Based Decisions, Inc. Sacramento, CA
- Mr. Chris Pace, Sacramento County Environmental Management Department