



Central Valley Regional Water Quality Control Board

11 October 2022

Dan Souza
DJA Properties, LLC
8415 South Valentine Avenue
Fresno CA 93706
bigdefarms@aol.com

NOTICE OF APPLICABILITY OF GENERAL ORDER NO. R5-2015-0012-077, FORMER DELTA CLEANERS, 219 OAK STREET, BRENTWOOD, CONTRA COSTA COUNTY

BSK Associates (BSK) submitted on behalf of DJA Properties, LLC (Discharger), a Notice of Intent (NOI) dated 21 June 2022, the *Remedial Action Plan, Former Delta Cleaners, 219 Oak Street, Brentwood, California* (RAP), dated 21 June 2022, 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), and the *Remedial Action Plan Addendum 1* (Contingency Plan), dated 30 August 2022. 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. R5-2015-0012-077.

Project Location:

The project is located at 219 Oak Street in the City of Brentwood, Contra Costa County, Latitude 37° 55' 59.6" N, Longitude 121° 41' 39.6" W, Assessor's Parcel Number 013-080-008-9.

Project Description:

Dry-cleaning operations between 1978 to 1993 at the former Delta Cleaners facility in Brentwood, Contra Costa County (Site) resulted in the release of the dry-cleaning solvent tetrachloroethene (PCE) to soil and groundwater. The former dry-cleaner operated on the ground floor of a two-story building that was demolished in June 2020. The Site is currently vacant.

Groundwater beneath the Site has been delineated into two zones. The lower groundwater zone (LGZ) is the deepest, occurring from 50 feet below ground surface (bgs) to 100 feet bgs. The upper groundwater zone (UGZ) occurs from approximately 20 feet bgs to 50 feet bgs. Based on groundwater data collected at the Site to date, PCE contamination appears to be limited to the UGZ. Depth to groundwater in the UGZ in February 2022 was approximately 29 feet bgs. Groundwater flow direction in the UGZ during February 2022 was generally to the east with what appears to be localized gradients near a small depression and mound toward the northwest and northeast, respectively.

In-situ remediation has been proposed to address the elevated PCE concentrations in groundwater and further reduce PCE mass at the Site. The treatment will involve injection of amendments including 3DMicroemulsion (3DMe) electron donor emulsion, Sulfidated Micro Zero Valent Iron (SMZVI) iron suspension, and Bio-Dechlor Inoculum Plus (BDI Plus) soil bacteria within the source area where PCE concentrations have been detected at a maximum concentration of 240 micrograms per liter. Approximately 85 injection points will be utilized to apply the amendment solution in a depth interval of approximately 22 to 50 feet bgs. The proposed amendment mixture contains approximately 63 gallons of 3DMe concentrate, 8 gallons of SMZVI suspension, 1.5 liters of BDI Plus concentrate, and 735 gallons of water at each injection point. Total estimated amendments for the 85 injection points contain approximately 44,400 pounds (5,321 gallons) of 3DMe concentrate, 10,000 pounds (662 gallons) of SMZVI, 129 liters of BDI Plus, and 62,475 gallons of water.

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

On 7 September 2022, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) circulated a fact sheet describing the project and providing interested parties with 30 days to submit comments or questions. No substantive comments were received by 7 October 2022, or as of the date of this letter.

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 RAP, 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 3DMe electron donor emulsion, SMZVI iron suspension, BDI Plus soil bacteria, 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. Should corrective actions be necessary, the Discharger will consult with the Central Valley Water Board to determine appropriate corrective action measures as outlined in the Contingency Plan. Once approved by the Central Valley Water Board staff, the Discharger will immediately implement regulatory approved contingency measures.
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. R5-2015-0012-077, and any revisions thereto as ordered by the Executive Officer.

If you have any questions regarding this matter, you may contact Nicholas White by telephone at (916) 464-4856 or by email at Nicholas.White@waterboards.ca.gov.

Original signed by John J Baum for
PATRICK PULUPA
Executive Officer

Attachment: Monitoring and Reporting Program Order No. R5-2015-0012-077

cc: (via email)

Mr. Loren Harlow, Baker Manock & Jensen, PC
Lharlow@bakermanock.com

Mr. Tony Martin, P.G., BSK Associate
tmartin@bskassociates.com