CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER R2-2025-0019

ADOPTION OF CLEANUP AND ABATEMENT ORDER NO. R2-2025-0019 for:

CHARLES H. STOLL, TRUSTEE of the STOLL MAIN STREET TRUST
CHARLES H. STOLL
GURCHARANJEET S ANAND & MARJEET ANAND
GURDEV S. KHERA & HARBAJAN KAUR
SHARON SCHUYLER
TIMOTHY EWING & JANICE EWING
ESTATE of ARTHUR H. PLATO JR.

For the property located at:

555 MAIN STREET
PLEASANTON, ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Regional Water Board), finds that:

1. **Site Location**: American Cleaners is a former dry cleaner facility that operated at 555 Main Street in Pleasanton (Source Property, see the attached figure.). Pollutants discharged from the operation of the dry cleaner have migrated off the Source Property as described in Findings 7 and 8 below. The Site consists of the full lateral and vertical extent of pollutants resulting from their discharge at the Source Property and the migration off the Source Property. There is a two-story building at the Source Property that contains three commercial units on the first floor and one residential apartment on the second floor. Land use in the surrounding area is commercial and residential.

2. **Site History:** The Source Property was developed as a commercial laundry as early as 1907. The following tables summarize the history of owners and operators at the Source Property since 1943.

Property Owner History	
Time Period	*Owner Name*
1977 to Present	Charles H. Stoll, in his individual capacity and as trustee of the Stoll Main Street Trust
1972 to 1977	Arthur H. Plato Jr. (deceased) & Margaret Ann Plato (deceased)
1947 to 1972	Arthur H. Plato Sr. (deceased) & Mary E. Plato (deceased)

Dry Cleaner Operator History	
Time Period	*Operator Name*
1991 to 1992	Gurcharanjeet S. Anand & Marjeet Anand
1990 to 1991	Gurdev S. Khera & Harbajan Kaur
1986 to 1990	Gregory (deceased) & Sharon Schuyler
1976 to 1986	Timothy & Janice Ewing
1972 to 1976	Arthur H. Plato Jr. (deceased)
1966 to 1971	Mary E. Plato (deceased)
1943 to 1966	Arthur H. Plato Sr. (deceased)

3. **Common Practices Among Dry Cleaner Operations and Discharges at the Source Property**

Dry cleaners that operated during the 1940s to early 1990s (the time period of dry cleaning operations at the Source Property) commonly used tetrachloroethene (PCE). Consistent with common practice, the operators identified above used PCE in their dry cleaning operations at the Source Property. Industry-wide operational practices of dry cleaners during the 1940s to

1990s commonly caused discharges of PCE to soil and groundwater. The use of PCE by dry cleaners, the dangers of PCE, and the drycleaning operational practices that are known to cause discharges are described in the following documentation:

- Santa Clara Valley Water District's 2007, *Study of Potential for Groundwater Contamination from Past Dry Cleaner Operations in Santa Clara County* (Santa Clara Valley Water District Study)
- *City of Modesto v. Superior Court* (2004) 19 Cal.App.5th 130 (*City of Modesto*)
- *United Artists Theatre Circuit, Inc. v. California Regional Water Quality Control Bd.* (2019) 42 Cal.App.5th 851 (*United Artists*).

Consistent with *United Artists*, the dangers of dry-cleaning solvents in general, and tetrachloroethene (PCE) in particular, was known during the period of dry cleaning operations at Source Property (1943 to 1992):

> For example, as early as in 1953, the California Supreme Court made reference to a statute addressing "Dry Cleaning Equipment Employing Volatile and Inflammable Solvents." (*State Bd. of Dry Cleaners v. Thrift-D-Lux Cleaners* (1953) 40 Cal.2d 436, 440.). In 1965 the Legislature set a specific maximum level for PCE vapor in former Health and Safety Code section 13399.5, above which would be considered a "dangerous toxic concentration." (Stats. 1965, ch. 1781, § 13, p. 3974.) In the 1960s, the San Francisco Examiner reported deaths associated with PCE and dry cleaning. In 1966, the California State Board of Dry Cleaners held safety seminars throughout the state to warn against the dangers of PCE. In 1975, the City of Santa Clara adopted an ordinance prohibiting the discharge of a variety of pollutants into the sewer system, including chlorinated hydrocarbons like PCE because they impact receiving waters and are hazardous to humans and fish. In 1977, the Director of the National Institutes of Health published in the Federal Register a summary of a study regarding the "possible carcinogenicity" of PCE. (Report on Bioassay of Tetrachloroethylene for Possible Carcinogenicity, 42 Fed.Reg. 55270–55271 (Oct. 3, 1977).) In early 1978, the Environmental Protection Agency (EPA) published a list of toxic pollutants, including PCE. (Publication of Toxic Pollutant List, 43 Fed.Reg. 4108–4109 (Jan. 25, 1978).) In 1980, the EPA recognized PCE as a potential human carcinogen and adopted water quality standards for PCE. (Water Quality Criteria Documents, 45 Fed.Reg. 79318, 79340 (Nov. 28, 1980).) Based on the widespread problem of PCE pollution from dry cleaners, in 2007, California adopted rules

phasing out the use of PCE at dry cleaners between 2008 and 2023. (Cal. Code Regs., tit. 17, § 93109.)[1]

City of Modesto and the Santa Clara Valley Water District Study describe common release mechanisms from dry cleaner operations that include the following:

- PCE spilled onto the floor from dry cleaning equipment maintenance and operation, equipment failure, solvent transfer and storage, or drips from wet clothing with residual PCE.
- PCE spilled onto the floor then seeped through concrete or cracks and reached the soil and groundwater below.
- PCE dumped by dry cleaning equipment operators onto soil outside of the building.
- PCE spilled from the PCE delivery truck that supplied the dry cleaning equipment.
- PCE-containing wastewater from the dry cleaning equipment that was disposed to the storm drain or the sanitary sewer and then leaked out of the pipe to soil and groundwater.

The concentrations of PCE at the Source Property are consistent with these common release mechanisms. The highest concentrations of PCE in soil and soil vapor at the Site are beneath the former dry cleaner building in the approximate locations of the former dry cleaning equipment and former PCE storage drum area. PCE is also in groundwater at and down-gradient of the former dry cleaner building. The PCE groundwater plume does not extend upgradient.

4. **Named Dischargers**

Charles H. Stoll, as Trustee of the Stoll Main Street Trust and in his individual capacity, is named as a discharger because he is the current owner of the Source Property on which there is an ongoing discharge of pollutants, he has knowledge of the discharge, and he has the legal ability to control the discharge. In December 2002, Charles H. Stoll deeded the Source Property to himself as the trustee of Stoll Main Street Trust. The Stoll Main Street Trust is a revocable trust and as such the transfer did not result in a change in ownership,[2] and the trustor—Charles H. Stoll—has had continuing ownership of the Source

[1] 42 Cal.App.5th at 861–62.

[2] See *Boshernitsan v. Bach* (2021) 61 Cal.App.5th 883, 891–93 (“[A] revocable inter vivos trust is recognized as simply ‘a probate avoidance device,’ ” and “when property is held in this type of trust, the settlor and lifetime beneficiary ‘“has the equivalent of full ownership of the property.” ’ ”); see also Cal. Code Regs., tit. 18, § 462.160(b)(2) (providing that the transfer of real property to a revocable trust does not result in a change in ownership for purposes of sections 1 and 2 of Article XIII A of the California Constitution).

Property since 1977. Moreover, prior to transferring the Source Property to the trust (1977–2002), Charles H. Stoll knew or should have known (based on the information in Finding 3 above) that the dry cleaning operations at the Source Property created a reasonable possibility of a discharge into waters of the state of wastes that could create or threaten to create a condition of pollution or nuisance and he had the legal ability to prevent the discharge.

The Estate of Arthur H. Plato, Jr. is named as a discharger because of substantial evidence that Arthur H. Plato Jr., through his operation of the dry cleaner, discharged pollutants to soil and groundwater at the Source Property. The evidence of a discharge from the dry cleaner includes the use of PCE in dry cleaning operations, the presence of these same pollutants in soil beneath the former dry cleaner building in the approximate locations of the former dry cleaning equipment and former PCE storage drum area, and the presence of these same pollutants in groundwater at and down-gradient of the former dry cleaner building. (See Finding 3.) The Estate of Arthur H. Plato, Jr. is also named as a discharger because Arthur H. Plato Jr. owned the Source Property during the time of the activity that resulted in the discharge, had knowledge of the discharge or the activities that caused the discharge, and had the legal ability to prevent the discharge.

Gurcharanjeet S. Anand and Marjeet Anand are named as dischargers because of substantial evidence that they discharged pollutants to soil and groundwater at the Source Property, including the use of PCE in dry cleaning operations, the presence of these same pollutants in soil beneath the former dry cleaner building in the approximate locations of the former dry cleaning equipment and former PCE storage drum area, and the presence of these same pollutants in groundwater at and down-gradient of the former dry cleaner building. (See Finding 3.)

Gurdev S. Khera and Harbajan Kaur are named as dischargers because of substantial evidence that they discharged pollutants to soil and groundwater at the Source Property, including the use of PCE in dry cleaning operations, the presence of these same pollutants in soil beneath the former dry cleaner building in the approximate locations of the former dry cleaning equipment and former PCE storage drum area, and the presence of these same pollutants in groundwater at and down-gradient of the former dry cleaner building. (See Finding 3.)

Sharon Schuyler is named as a discharger because of substantial evidence that Gregory and Sharon Schuyler discharged pollutants to soil and groundwater at the Source Property, including the use of PCE in dry cleaning operations, the presence of these same pollutants in soil beneath the former dry cleaner building in the approximate locations of the former dry cleaning equipment and former PCE storage drum area, and the presence of these same pollutants in groundwater at and down-gradient of the former dry cleaner building. (See

Finding 3.) Gregory Schuyler is deceased and therefore not named as a discharger.

Timothy Ewing and Janice Ewing are named as dischargers because of substantial evidence that they discharged pollutants to soil and groundwater at the Source Property, including the use of PCE in dry cleaning operations, the presence of these same pollutants in soil beneath the former dry cleaner building in the approximate locations of the former dry cleaning equipment and former PCE storage drum area, and the presence of these same pollutants in groundwater at and down-gradient of the former dry cleaner building. (See Finding 3.)

The above dischargers are collectively referred to as the Discharger or Dischargers.

If additional information is submitted indicating that other parties caused or permitted any waste to be discharged on the Source Property where it entered or could have entered waters of the state, the Regional Water Board will consider adding those parties' names to this Order.

5. **Regulatory Status:** This Site is currently not subject to a Regional Water Board cleanup and abatement order.

6. **Site Hydrogeology:** The Site is in the Livermore Valley Groundwater Basin. Zone 7 Water Agency manages groundwater in the basin and prepared a 2021 update to its Alternative Groundwater Sustainability Plan for the basin. The Basin has two principal aquifer units: the Upper Aquifer and the Lower Aquifer. The Upper Aquifer is from about 50 to 150 feet below ground surface (ft bgs). The Lower Aquifer is from about 175 to greater than 800 ft bgs. Between the Upper Aquifer and Lower Aquifer, there is an aquitard with a thickness that ranges from less than 5 feet up to 50 feet. The aquitard generally occurs between 80 and 175 ft bgs. Vertical leakage from the Upper Aquifer through the aquitard provides most of the recharge to the Lower Aquifer. Zone 7 Water Agency has groundwater production wells screened in the Lower Aquifer. At the Alameda County Fairgrounds (Fairgrounds), about 2,000 feet northwest of the Source Property, there is a supply well that is screened in the Lower Aquifer. The Fairgrounds uses this supply well for drinking water, sanitation, and irrigation. The Fairgrounds also has an auxiliary well screened in the Lower Aquifer about 4,000 feet northwest of the Source Property[3].

The stratigraphy in the Upper Aquifer is highly heterogeneous, which is a result of the geologic depositional environments that transported sediments of different grain sizes over time. The Upper Aquifer has sand and gravel from river and alluvial fan deposits interbedded with clay and silt from floodplain and lake

[3] The Fairgrounds' auxiliary well is currently out of commission; however, the Fairgrounds has stated that it is rehabilitating the well to provide a backup supply of water for drinking, sanitation, and irrigation purposes.

deposits. The river depositional environment is characterized by channel shifting, sandbar migration, and seasonal flooding. This resulted in a complex geologic profile in the Upper Aquifer, with lenses of sand and gravel interlayered in discontinuous layers of clay and silt. This discontinuous interlayering causes groundwater in the Upper Aquifer to be hydraulically connected.

Investigations at the Site have explored the hydrogeology to a total depth of 220 ft bgs. The groundwater flow direction in the Upper Aquifer fluctuates to the west-northwest and north-northwest. Monitoring wells in the Upper Aquifer at the Site have been screened at different depth intervals. The depth interval from about 30 to 80 ft bgs is referred to as "Zone A." Within Zone A, the depth interval from about 30 to 60 ft bgs is referred to as "Zone A-1" and from about 60 to 70 ft bgs is referred to as "Zone A-2". The depth interval from about 95 to 125 ft bgs is referred to as "Zone B."

7. **Remedial Investigation:** Investigations at the Site were conducted between 2017 and 2025. PCE, a common solvent used in dry cleaning, was detected in soil, groundwater, soil gas, and indoor air. The table below shows the current maximum PCE concentration in each media at the Site compared to the respective Environmental Screening Levels (ESLs) and the maximum contaminant level (MCL) for drinking water.

Current Maximum PCE Concentrations			
Soil (mg/kg)			
Location	**Current Maximum Concentration**	**ESL**	**Exposure Pathway**
Boring RB-1, 5.5 ft bgs	12	0.08	Leaching to groundwater
Boring RSV-1, 22 ft bgs	33	0.08	Leaching to groundwater
Groundwater (µg/L)			
Upper Aquifer			
Zone A-1 well	25,600	5	Drinking water / MCL
Zone A-2 grab sample	3,700	5	Drinking water / MCL
Zone B well	4,540	5	Drinking water / MCL
Lower Aquifer			
MW-1D well	22	5	Drinking water / MCL
Fairgrounds supply well	29	5	Drinking water / MCL
Soil Gas (µg/m^3)			
Vapor probe at 5 ft bgs	110,000	67	Vapor intrusion
Vapor probe at 17 ft bgs	4,700,000	67	Vapor intrusion
Vapor probe at 30 ft bgs	5,400,000	67	Vapor intrusion
Indoor Air (µg/m^3)			
Source Property building	0.62	2	Inhalation
Museum on Main building	13	2	Inhalation

Key
mg/kg = milligrams per kilogram
µg/L = micrograms per liter
µg/m^3 = micrograms / meter cubed
ESL = Environmental Screening Level, SF Bay Water Board, 2019
ft bgs = feet below ground surface

The PCE concentrations are significantly greater than the ESLs and the MCL for drinking water. Additional investigation is needed to adequately define the extent of contamination in soil and groundwater, as described below, to identify potential threats to human health and the environment.

Soil – Soil boring RSV-1 had PCE at 33 milligrams per kilogram (mg/kg) and no borings were drilled in the immediate vicinity to the north. Soil boring RB-2 had PCE at 10 mg/kg and no borings were drilled in the immediate vicinity to the east. Soil boring MW-3 had PCE at 0.49 mg/kg and no borings were drilled in the immediate vicinity to the west and at a similar depth. Therefore, PCE in soil is undefined in the north, east, and west directions.

Groundwater

Zone A-1, 30 to 60 ft bgs – PCE in groundwater from 30 to 60 ft bgs is defined in all directions and the plume is about 500 feet wide and extends about 900 feet downgradient (west-northwest) of the Source Property. However, west of the Source Property a grab groundwater sample, CPT-2, had PCE at 4,700 µg/L and there is about 600 feet between CPT-2 and a grab groundwater sample, MW-1D, to the west that had PCE at 3 µg/L. Therefore, PCE in groundwater between CPT-2 and MW-1D is undefined.

Zone A-2, 76 to 80 ft bgs – Grab groundwater samples from 76 to 80 ft bgs had PCE at 3,700 µg/L and 1,300 µg/l and no step-out borings were drilled. Therefore, PCE in groundwater from 76 to 80 ft bgs is undefined in all directions.

Zone B, 105 to 115 ft bgs – Groundwater monitoring wells screened from 105 to 115 ft bgs had PCE at 4,540 µg/L and no step-out borings were drilled. Therefore, PCE in groundwater from 105 to 115 ft bgs is undefined in all directions.

Zone B, 123 to 126 ft bgs – A grab groundwater sample from 123 to 126 ft bgs had PCE at 1,300 µg/L and no step-out borings were drilled. Therefore, PCE in groundwater from 123 to 126 ft bgs is undefined in all directions.

Lower Aquifer – Well MW-1D is screened from 180 to 190 ft bgs and had PCE at 22 µg/L, and a grab groundwater sample from 164 to 167 ft bgs had PCE at 800 µg/L. The Fairgrounds supply well is screened from about 200 to 500 ft bgs and had PCE at 29 µg/L. No step-out borings were drilled from MW-1D or the

Fairgrounds supply well. Therefore, PCE in groundwater in the Lower Aquifer is undefined in all directions.

Soil Gas – PCE in soil gas is adequately defined. The PCE soil vapor plume is about 300 feet wide and 400 feet long.

Indoor Air – PCE in indoor air is adequately defined. PCE in indoor air has been detected in buildings along Main Street about 200 feet north and south of the Source Property.

8. **PCE Migration:** The discharge of PCE at the Source Property has resulted in the vertical and lateral migration of PCE away from the Source Property.

PCE Migration from the Source Property to CPT-2 and CPT-3 – PCE discharged at the Source Property migrated vertically through the vadose zone into groundwater, as evidenced by groundwater monitoring well samples from MW-3 and MW-4 (at the Source Property and screened from 30 to 50 ft bgs) that had PCE concentrations up to 49,000 µg/L and 36,000 µg/L, respectively. PCE in groundwater at MW-3 and MW-4 migrated vertically and laterally in the downgradient direction (west-northwest and north-northwest), as evidenced by the boring CPT-2 about 100 feet west northwest of the Source Property that had grab groundwater samples with 4,700 µg/L of PCE at 65 ft bgs, 3,700 µg/L of PCE at 80 ft bgs, and 600 µg/L of PCE at 113 ft bgs, and evidenced by the boring CPT-3 about 300 feet north-northwest of the Source Property that had grab groundwater samples with 80 µg/L of PCE at 65 ft bgs, 1,300 µg/L of PCE at 80 ft bgs, and 2,800 µg/L of PCE at 104 ft bgs.

PCE Migration from CPT-3 to MW-10B – PCE in groundwater in the boring CPT-3 migrated west-northwest as evidenced by monitoring well sample MW-10B (screened from 105 to 115 ft bgs) that had 4,480 µg/L of PCE.

PCE Migration from MW-10B to MW-1D – PCE in groundwater at MW-10B migrated vertically and west, as evidenced by well boring MW-1D about 300 feet west that had grab groundwater samples with 1,100 µg/L of PCE at 127 ft bgs and 800 µg/L of PCE at 167 ft bgs and a monitoring well sample from MW-1D (screened from 180 to 190 ft bgs) that had a PCE groundwater concentration up to 35 µg/L. PCE in groundwater at MW-1D migrated vertically and west as evidenced by the Fairgrounds supply well (screened from 218 to 500 ft bgs) that is about 1,400 feet west of MW-1D and had up to 62 µg/L of PCE, exceeding the MCL of 5 µg/L. The migration of PCE from the Source Property has impacted the Fairgrounds supply well causing the exceedance of drinking water standards.

9. **Interim Remedial Measures**

Groundwater 'Zone A-1' – In June 2022, a pilot test of enhanced reductive dechlorination and in-situ chemical reduction (ERD/ISCR) began for a small area of groundwater from 40 to 60 ft bgs at the Source Property. From 2022 to 2023,

performance monitoring was completed. PCE in groundwater monitoring well MW-3 reduced from 49,000 µg/L to 170 µg/L from 2019 to 2023.

Soil and Soil Gas – From 2020 to 2025, a series of six-month pilot tests of soil vapor extraction (SVE) and air sparge have removed 226 pounds of PCE. The SVE system also serves as a mitigation measure for vapor intrusion.

Indoor Air – In November 2022, an exhaust fan was installed in the Source Property building and operates during the building's business hours. In March 2025, an epoxy sealant was applied to the basement floor at the 603 Main Street building.

Fairgrounds Supply Well – From 2001 to the present, the Fairgrounds has been conducting wellhead treatment with granular activated carbon (GAC) for its supply well.

The discharge of waste to waters of the state associated with the drycleaning operations at the Source Property creates and threatens to create a condition of pollution and nuisance. Further remedial measures are needed to remediate the contamination at the Site; to eliminate the threat to water quality, public health, and the environment posed by the discharge of waste; and to treat water from the Fairgrounds supply well so it meets drinking water standards.

10. **Interim Remedial Action Plan:** On April 14, 2025, the Dischargers submitted an Updated Remedial Investigation and Feasibility Study Report and Interim Remedial Action Plan (IRAP) that evaluated four alternatives to remediate soil, soil gas, groundwater, and indoor air affected by the release of PCE. The IRAP recommends alternative 2, which includes the following elements:
    - ERD/ISCR at 49 injection points into the Upper Aquifer between 25 and 80 ft bgs at and near the Source Property. One supplemental injection event will be conducted at 13 injection points if warranted.
    - Expansion of the SVE system with approximately six additional extraction wells. The expanded SVE system will operate for four years.
    - Installation of nine additional groundwater monitoring wells in the Upper Aquifer.
    - Soil gas monitoring for eight years at approximately 36 soil vapor monitoring probes.
    - Indoor air monitoring for eight years at approximately 7 locations.
    - Inspection of vapor intrusion mitigation measures at 555 Main Street and 603 Main Street.
    - Groundwater monitoring for 30 years at approximately 25 groundwater monitoring wells.
    - Granular activated carbon (GAC) replacement for the Fairgrounds' well treatment system for five years.
    - Five-year review reports.

The actions proposed in the IRAP may be insufficient to reach cleanup levels throughout the Site because of 1) the PCE concentrations in soil, groundwater, and soil gas that are orders of magnitude greater than the ESLs, 2) the complex hydrogeology, 3) the incomplete delineation of the contaminated media, 4) the PCE in groundwater that migrated such long vertical and lateral distances, and 5) the use of the Lower Aquifer as a current source of drinking water. Therefore, further active remediation beyond what is proposed in the IRAP may be needed.

Furthermore, five years of GAC replacement for the Fairgrounds' well treatment system may be an insufficient period of time of replacement water for the Fairgrounds' well because of the reasons in the preceding paragraph and costs of replacement water during the five-year period could exceed those projected in the IRAP. Therefore, replacement water may be needed beyond the five years proposed in the IRAP. Uninterrupted water replacement for the Fairgrounds' supply well is needed until cleanup levels are achieved.

This Order approves the IRAP and requires its implementation. Approval of the IRAP does not limit the costs required to implement Tasks 9 through 12 to the cost projections for replacement water set forth in the IRAP.

11. **Adjacent Sites:** The former Pleasanton French Laundry at 560 Main Street is across the street from the Source Property in the eastern, upgradient direction. PCE was detected at 560 Main Street but at significantly lower concentrations than at the Source Property. The plumes do not appear to be commingled.

12. **Basin Plan:** The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Resources Control Board, Office of Administrative Law and the USEPA, where required.

    The potential beneficial uses of groundwater underlying and adjacent to the Site include:

    - Municipal and domestic water supply
    - Industrial process water supply
    - Industrial service water supply
    - Agricultural water supply

13. **Other Regional Board Policies:** Regional Water Board Resolution No. 89-39, "Sources of Drinking Water," defines potential sources of drinking water to include all groundwater in the region, with limited exceptions for areas of high total dissolved solids (TDS), low-yield, or naturally high contaminant levels.

14. **State Water Board Policies:** State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304," applies to this discharge. It directs the Regional Water Boards to set cleanup levels equal to background water quality or the best water quality which is reasonable, if background levels cannot be restored. The cleanup levels established in this order are equal to the best water quality that is reasonable and are consistent with the maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses of such water, and will not result in exceedance of applicable water quality objectives. The cleanup level for groundwater is set to the drinking water standards because it is technically and economically infeasible to reach background water quality levels. The Regional Water Board considered the factors in the California Code of Regulations, title 23, section 2550.4(d) and determined that the cleanup levels will not pose a substantial threat to human health or the environment as long as the levels are met. This Order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

    Resolution 92-49 also requires cleanup actions to be consistent with State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California." Resolution 68-16 requires maintenance of high water quality unless a lesser water quality is consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial uses, and will not result in exceedance of applicable water quality objectives.

15. **Cleanup and Abatement Authority:** California Water Code section 13304 authorizes the Regional Water Board to issue orders requiring a discharger to clean up and abate waste where the discharger has caused or permitted waste to be discharged or deposited where it is or probably will be discharged into waters of the state and creates or threatens to create a condition of pollution or nuisance.

16. **Authority to Require Replacement Water:** A cleanup and abatement order issued by a regional board may require the provision of, or payment for, uninterrupted replacement water service, which may include wellhead treatment, to each affected public water supplier or private well owner. (Water Code, § 13304, subd.(a).) Replacement water required by a cleanup and abatement order shall meet all applicable federal, state, and local drinking water standards, and shall have comparable quality to that pumped by the public water system or private well owner before the discharge of waste. (Water Code, § 13304, subd. (f).) In a cleanup and abatement order requiring the provision of replacement water for more than 30 days, the Regional Water Board must request a water replacement plan from the discharger; the water replacement plan must be approved by the Board before its implementation. (Water Code, § 13304, subd. (h).)

17. **Cost Recovery:** Pursuant to California Water Code section 13304, the Dischargers are hereby notified that the Regional Water Board is entitled to, and will seek reimbursement for, all reasonable costs actually incurred by the Regional Water Board 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.

18. **Human Right to Water:** Under Water Code §106.3, the State of California's policy is that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. (Water Code, § 106.3; see also State Water Board Resolution No. 2016-0010.) The human right to water extends to all Californians, including disadvantaged individuals and groups and communities in rural and urban areas. This Order promotes the human right to water by requiring cleanup to meet maximum contaminant levels designed to protect human health and ensure that water is safe for domestic use and by requiring the provision of replacement water.

19. **CEQA:** This action is an order to enforce the laws and regulations administered by the Regional Water Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, title 14, section 15321.

20. **Notification:** The Regional Water Board has notified the Dischargers and all interested agencies and persons of its intent under California Water Code section 13304 to prescribe site cleanup requirements for the discharge and has provided them with an opportunity to submit their written comments.

IT IS HEREBY ORDERED, pursuant to section 13304 of the California Water Code, that the Dischargers (or their agents, successors, or assigns) shall investigate, clean up and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous substances in a manner that will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.

2. Further significant migration of wastes or hazardous substances through subsurface transport to waters of the State is prohibited.

3. Activities associated with the subsurface investigation and cleanup that will cause significant adverse migration of wastes or hazardous substances are prohibited.

B. INTERIM REMEDIAL ACTION PLAN AND CLEANUP LEVELS

1. **Implement Interim Remedial Action Plan:** The discharger shall implement the IRAP described in Finding 10.

2. **Groundwater Cleanup Levels:** The following groundwater cleanup levels shall be met in all wells identified in the approved self monitoring plan for the IRAP.

Constituent	Concentration (µg/L)
PCE	5
TCE	5
trans-1,2-DCE	6
cis-1,2-DCE	6
vinyl chloride	0.5

Key
The groundwater cleanup levels are based on drinking water standards (e.g., Maximum Contaminant Levels).
TCE = Trichloroethene
trans-1,2-DCE = trans-1,2-dichloroethene
cis-1,2-DCE = cis-1,2-dichloroethene

3. **Soil Cleanup Levels**: The following soil cleanup levels shall be met in all Site vadose-zone soils.

Constituent	Concentration (mg/kg)
PCE	0.08
TCE	0.085
trans-1,2-DCE	14
cis-1,2-DCE	1.6
vinyl chloride	0.0015

Key
The soil cleanup levels are intended to prevent leaching to groundwater. Cleanup to these levels will protect beneficial uses of groundwater and will result in acceptable residual risk to human health.

4. **Soil Gas Cleanup Levels**: The following soil gas cleanup levels shall be met in all Site vadose-zone soils.

Constituent	Commercial Concentration (µg/m^3)	Residential Concentration (µg/m^3)
PCE	67	15
TCE	100	16
trans-1,2-DCE	12,000	2,800
cis-1,2-DCE	12,000	2,800
vinyl chloride	5.2	0.32

Key
The soil gas cleanup levels are intended to protect commercial and residential occupants from health risks associated with vapor intrusion into indoor air. Cleanup to these levels will result in acceptable residual risk to human health.

5. **Indoor Air Cleanup Levels**: The following indoor air cleanup levels shall be met in all Site buildings.

Constituent	Commercial Concentration (µg/m^3)	Residential Concentration (µg/m^3)
PCE	2	0.46
TCE	3	0.48
trans-1,2-DCE	350	83
cis-1,2-DCE	35	8.3
vinyl chloride	0.16	0.0095

Key
The indoor air cleanup levels are intended to protect commercial and residential occupants from health risks associated with inhalation of indoor air affected by vapor intrusion. Cleanup to these levels will result in acceptable residual risk to human health.

C. TASKS

1. ADDITIONAL PHASE REMEDIAL INVESTIGATION WORKPLAN

COMPLIANCE DATE: 60 days after required by Executive Officer, but no sooner than January 31, 2031

Submit a workplan acceptable to the Executive Officer to define the vertical and lateral extent of subsurface contamination. The workplan shall consider all relevant contaminants, media (soil, groundwater, indoor air), exposure pathways, and receptors. It shall be designed so that its implementation produces site data needed to assess contamination threat to human health and the environment. The workplan shall specify investigation methods and a proposed time schedule. The Executive Officer will require this workplan if a previous phase of a remedial investigation did not adequately define the vertical and lateral extent of soil, groundwater, and indoor air contamination.

2. COMPLETION OF ADDITIONAL PHASE REMEDIAL INVESTIGATION

COMPLIANCE DATE: According to schedule in Task 1 approved by the Executive Officer

Complete tasks in the approved additional phase investigation workplan (Task 1) in accordance with the approved schedule and submit a technical report acceptable to the Executive Officer documenting their completion. The technical report shall define the vertical and lateral extent of contamination in all media down to cleanup levels.

3. START-UP REPORT FOR IRAP

COMPLIANCE DATE: January 30, 2026

Submit a technical report acceptable to the Executive Officer documenting the start-up of the IRAP described in Finding 10 including expansion of the SVE system, completion of the first round of groundwater injections, installation of the additional groundwater monitoring wells and the first round of post-remedial monitoring results.

4. **SELF-MONITORING PLAN FOR IRAP**

COMPLIANCE DATE: January 30, 2026

Submit a self-monitoring plan for the IRAP acceptable to the Executive Officer that includes the following elements:

- The schedule for groundwater monitoring wells (including the Fairgrounds' supply well), soil gas monitoring probes, and indoor air monitoring locations for the Site, sampling frequency, and analyses.
- The reporting schedule and a description of the components that will be included in the monitoring reports.
- The reporting schedule for five-year status reports.

5. **REMEDIAL ACTION PLAN**

COMPLIANCE DATE: 120 days after required by Executive Officer, but no sooner than January 31, 2031

Submit a remedial action plan acceptable to the Executive Officer containing:

- Summary of the remedial investigation
- Summary of risk assessment or screening-level evaluation
- Evaluation of the installed interim remedial actions
- Feasibility study evaluating alternative final remedial actions
- Recommended final remedial actions
- Implementation tasks and time schedule

The Executive Officer will require a remedial action plan if the IRAP activities specified in this Order are not effective in achieving cleanup levels throughout the Site.

The remedial action plan must propose remedial work that has a high probability of eliminating unacceptable threats to human health and restoring beneficial uses of water in a reasonable time, with "reasonable time" based on the severity of impact to the beneficial use (for current impacts) or the time before impact to the beneficial use will occur (for potential future impacts). The remedial action plan must address the full extent of contamination at the Site in the Upper and Lower Aquifers.

The remedial action plan shall be consistent with State Water Board Resolution No. 92-49 as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304") and shall consider the cleanup levels for soil, soil gas, groundwater, and indoor air identified in Section B.

6. **START-UP REPORT FOR REMEDIAL ACTION PLAN**

   COMPLIANCE DATE: 180 days after Executive Officer's approval of Task 5

   Implement the approved remedial action plan (Task 5) and submit a technical report acceptable to the Executive Officer documenting the completion of start-up.

7. **ADDITIONAL REMEDIAL ACTION PLAN**

   COMPLIANCE DATE: 120 days after required by Executive Officer, but no sooner than January 31, 2031

   Submit an additional remedial action plan acceptable to the Executive Officer if the prior remediation is not effective in achieving cleanup levels throughout the Site.

8. **START-UP REPORT FOR ADDITIONAL REMEDIAL ACTION PLAN**

   COMPLIANCE DATE: 180 days after Executive Officer's approval of Task 7

   Implement the approved additional remedial action plan (Task 7) and submit a technical report acceptable to the Executive Officer documenting the completion of start-up.

9. **INTERIM WATER REPLACEMENT PLAN FOR IMPACTED FAIRGROUNDS' SUPPLY WELL**

   COMPLIANCE DATE: August 29, 2025

   Submit a water replacement plan acceptable to the Executive Officer to provide or pay for uninterrupted replacement water service for five years (the timeframe proposed in the IRAP), which may include wellhead treatment, for the impacted Fairgrounds' supply well. The water replacement plan must include implementation tasks and an implementation schedule. The Regional Water Board will circulate the water replacement plan for public comment prior to approval by the Executive Officer.

10. **IMPLEMENTATION OF INTERIM WATER REPLACEMENT PLAN FOR THE IMPACTED FAIRGROUNDS' SUPPLY WELL**

    COMPLIANCE DATE: 30 days after Executive Officer's approval of Task 9

    Implement the approved water replacement plan to provide or pay for uninterrupted water replacement service (Task 9) and submit a technical report acceptable to the Executive Officer documenting the completion of start-up tasks.

11. **LONG-TERM WATER REPLACEMENT PLAN FOR IMPACTED SUPPLY WELL**

    COMPLIANCE DATE: 30 days after required by Executive Officer, but no sooner than July 31, 2030

    Submit a water replacement plan acceptable to the Executive Officer to provide or pay for uninterrupted replacement water service, which may include wellhead treatment, for an impacted supply well. The Executive Officer will require an additional water replacement plan if the IRAP activities specified in this Order are not effective in achieving cleanup levels at the Fairgrounds' supply well or another impacted supply well. The Discharger shall continue implementation of the interim replacement water plan in Task 9 until uninterrupted replacement water is provided under the long-term plan.

12. **IMPLEMENTATION OF ADDITIONAL WATER REPLACEMENT PLAN**

    COMPLIANCE DATE: 180 days after Executive Officer's approval of Task 11

    Implement the approved water replacement plan to provide or pay for uninterrupted replacement water service (Task 11) and submit a technical report acceptable to the Executive Officer documenting the completion of start-up tasks.

13. **OPERATION, MAINTENANCE, AND MONITORING PLAN FOR VAPOR INTRUSION MITIGATION**

    COMPLIANCE DATE: January 30, 2026

    Submit a technical report acceptable to the Executive Officer containing operation, maintenance, and monitoring (OM&M) procedures for the vapor intrusion mitigation measures at the Source Property building and the Museum on Main building. The technical report should include criteria to evaluate for curtailment of the vapor intrusion mitigation operation, maintenance, and monitoring.

14. **RISK MANAGEMENT PLAN**

    COMPLIANCE DATE: 60 days after required by Executive Officer

    Submit a technical report acceptable to the Executive Officer containing a risk management plan for proposed building demolition, soil excavation, and redevelopment at the Source Property.

15. **FIVE-YEAR STATUS REPORT**

COMPLIANCE DATE: January 31, 2031, and every five years thereafter

Submit a technical report acceptable to the Executive Officer evaluating the effectiveness of the approved remedial actions. The report shall include:

- Summary of effectiveness in controlling contaminant migration and protecting human health and the environment
- Comparison of contaminant concentration trends with cleanup levels
- Comparison of anticipated versus actual costs of cleanup activities
- Performance data (e.g., groundwater volume extracted, chemical mass removed, mass removed per million gallons extracted)
- Cost effectiveness data (e.g., cost per pound of contaminant removed)
- Summary of additional investigations (including results) and significant modifications to remediation systems
- Additional remedial actions proposed to meet cleanup levels (if applicable) including time schedule

If cleanup levels have not been met and are not projected to be met within a reasonable time, the report shall assess the technical practicability of meeting cleanup levels and may propose an alternative cleanup strategy.

16. **PROPOSED CURTAILMENT**

COMPLIANCE DATE: 60 days prior to proposed curtailment

Submit a technical report acceptable to the Executive Officer containing a proposal to curtail remediation. Curtailment includes system closure (e.g., well closure), system suspension (e.g., cease extraction but wells retained), and significant system modification (e.g., major reduction in extraction rates, closure of individual extraction wells within extraction network). The report shall include the rationale for curtailment. Proposals for final closure shall demonstrate that current factors for low-threat closure have been met.

17. **IMPLEMENTATION OF CURTAILMENT**

COMPLIANCE DATE: 60 days after Executive Officer approval of proposed curtailment

Implement the approved curtailment and submit a technical report acceptable to the Executive Officer documenting completion of the tasks identified in the proposed curtailment report.

18. **EVALUATION OF NEW HEALTH CRITERIA**

COMPLIANCE DATE: 90 days after evaluation report required by Executive Officer

Submit a technical report acceptable to the Executive Officer evaluating the effect on the approved remedial action plan of revising one or more cleanup levels in response to revision of drinking water standards, maximum contaminant levels, or other new health-based criteria.

19. **EVALUATION OF NEW TECHNICAL INFORMATION**

COMPLIANCE DATE: 90 days after evaluation report required by Executive Officer

Submit a technical report acceptable to the Executive Officer evaluating new technical information that bears on the approved remedial action plan and cleanup levels for this Site. In the case of a new cleanup technology, the report should evaluate the technology using the same criteria used in the feasibility study. Such technical reports shall not be required unless the Executive Officer determines that the new information is reasonably likely to warrant a revision in the approved remedial action plan or cleanup levels.

Delayed Compliance: If the Dischargers are delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the Dischargers shall promptly notify the Executive Officer.

D. PROVISIONS

1. **No Nuisance:** The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in Water Code section 13050(m).

2. **Good Operation and Maintenance**: The Dischargers shall maintain in good working order and operate as efficiently as possible any facility or control system installed to achieve compliance with the requirements of this order.

3. **Cost Recovery:** The Dischargers shall be liable, pursuant to Water Code section 13304, to the Regional Water Board for all reasonable costs actually incurred by the Regional Water Board 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. If the Site addressed by this Order is enrolled in a State Water Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised by the Dischargers over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.

4. **Access to Site and Records**: In accordance with Water Code section 13267(c), the Dischargers shall permit the Regional Water Board or its authorized representative:

   a. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.

   b. Access to copy any records required to be kept under the requirements of this Order.

   c. Inspection of any monitoring or remediation facilities installed in response to this Order.

   d. Sampling of any groundwater or soil that is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the Dischargers.

5. **Self-Monitoring Program:** The Dischargers shall comply with the Self-Monitoring Program as attached to this Order and as may be amended by the Executive Officer.

6. **Contractor/Consultant Qualifications:** All technical documents shall be signed by and stamped with the seal of a California registered geologist, a California certified engineering geologist, or a California registered civil engineer.

7. **Lab Qualifications:** All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Regional Water Board using approved U.S. EPA methods for the type of analysis to be performed. Quality assurance/quality control (QA/QC) records shall be maintained for Regional Water Board review. This provision does not apply to analyses that can only reasonably be performed onsite (e.g., temperature).

8. **GeoTracker Uploads:** The Dischargers are required to submit all reports and data in electronic format to the State Water Resources Control Board's GeoTracker database, pursuant to California Code of Regulations, title 23, sections 3890–3895. See Electronic Submittal of Information for guidance on submitting documents to GeoTracker. This requirement includes all chemical data, monitoring well information (latitudes, longitudes, elevations, depth and length of screened interval, and water depth), site maps, and boring logs. Chemical data must be submitted in Electronic Deliverable Format (EDF) and be in accordance with the GeoTracker Guidance Letter on Reporting of Estimated Results in EDF. The Dischargers are requested to also upload vapor intrusion sample location information. See Uploading Vapor Intrusion Information into GeoTracker for guidance on submitting sample location information.

9. **Reporting of Changed Owner or Operator:** The Dischargers shall notify the Executive Officer in writing on any changes in contact information, occupancy or ownership associated with the Source Property described in this Order.

10. **Reporting of Hazardous Substance Release:** If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, the Dischargers shall report such discharge to the Regional Water Board within 24 hours by calling (510) 622-2369.

    A written report shall be filed with the Regional Water Board within five working days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/agencies notified.

    This reporting is in addition to reporting to the California Emergency Management Agency required pursuant to the Health and Safety Code.

11. **Periodic Review:** The Regional Water Board will review this Order periodically and may revise it when necessary. The Dischargers may request revisions and upon review the Executive Officer may recommend that the Regional Water Board revise these requirements.

So ordered on July 9, 2025.

Eileen White

Digitally signed by Eileen White
Date: 2025.07.09 15:35:28 -07'00'

_____
Eileen M. White, P.E.
Executive Officer

Attachments: 1) Figure
2) Self-Monitoring Program

LEGEND

- SOURCE PROPERTY BOUNDARY
- PROPERTY LINE (APPROXIMATE)
- EXISTING GROUNDWATER MONITORING WELL
- EXISTING AIR SPARGE WELL
- HISTORICAL GRAB GROUNDWATER SAMPLING LOCATION

NOTES

SAMPLING LOCATIONS BASED ON THE FOLLOWING SOURCES:

1. SITE ASSESSMENT REPORT BY ADVANCEDGEO, INC. (AGI) DATED OCTOBER 15, 2018.
2. GROUNDWATER INVESTIGATION REPORT BY EKI ENVIRONMENT AND WATER, INC. DATED JUNE 2023.
3. DEEP WELL INSTALLATION REPORT BY AGI DATED NOVEMBER 4, 2020.
4. CONE PENETRATION TESTING REPORTS BY AGI DATED NOVEMBER 8, 2018 AND NOVEMBER 17, 2021.
5. SEWER INVESTIGATION BY ROUX DATED SEPTEMBER 18, 2020.

100' 0 100'

Title: **HISTORICAL GROUNDWATER SAMPLING LOCATIONS**

555 MAIN STREET
PLEASANTON, CALIFORNIA

Prepared for:
EDLIN GALLAGHER HUIE BLUM

ROUX

Compiled by: ET	Date: 23DEC2024
Prepared by: ET	Scale: AS SHOWN
Project Mgr: BW	Project: 2488.00058000
File: 2488.00058000 - RI-FS.DWG	

FIGURE 3-6

S:\CLIENTS\BASS\EDLIN HUIE & BLUM\STOLL V EWING DRYCLEANERS\3-ROUX WORK PRODUCT\FIGURES\2488.00058000 - RI-FS.DWG

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM for:

CHARLES H. STOLL, TRUSTEE of the STOLL MAIN STREET TRUST
CHARLES H. STOLL
GURCHARANJEET S ANAND & MARJEET ANAND
GURDEV S. KHERA & HARBAJAN KAUR
SHARON SCHUYLER
TIMOTHY EWING & JANICE EWING
ESTATE of ARTHUR H. PLATO JR.

For the property located at:

555 MAIN STREET
PLEASANTON, ALAMEDA COUNTY

1. **Authority and Purpose:** The Regional Water Board requires the technical reports identified in this Self-Monitoring Program pursuant to Water Code sections 13267 and 13304. This Self-Monitoring Program is intended to document compliance with Regional Water Board Order No. R2-2025-0019 (Order).

   Water Code section 13267 authorizes the Regional Water Board to require technical and monitoring reports from any person who has discharged, discharges, proposes to discharge, or is suspected of discharging waste that could affect water quality.

   The burden, including costs, of the monitoring reports, bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In this situation, the cost for preparing these reports, including the costs of hiring consultants, contractors, and completing the reports, is estimated to be from one million to two million dollars. These costs bear a reasonable relationship to the need for the reports and the benefits of the reports. The Regional Water Board needs the reports to provide performance monitoring of the remediation and to document the reduction of plume concentrations. The benefits of the reports include restoration of beneficial uses and the protection of public health and the environment.

2. **Monitoring:** The Dischargers shall measure the contaminants in all media consistent with their approved self-monitoring plan for the IRAP as required by Task 4 in the Order. The Dischargers may propose changes to their self-monitoring plan; any proposed changes are subject to Executive Officer approval.

3. **Semiannual Monitoring Reports:** The discharger shall submit semiannual monitoring reports to the Regional Water Board no later than 30 days following the end of the semiannual reporting period (e.g., report for first half of the year due July 30). The first semiannual monitoring report shall be due on July 30, 2026. The reports shall include:

    a. Transmittal Letter: The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct the problem. The letter shall be signed by the Discharger's principal executive officer or his/her duly authorized representative, and shall include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.

    b. Groundwater Elevations: Groundwater elevation data shall be presented in tabular form, and a groundwater elevation map shall be prepared for each monitored water-bearing zone. Historical groundwater elevations shall be included in the second semiannual report each year.\

    c. Groundwater Analyses: Groundwater sampling data shall be presented in tabular form, and an isoconcentration map shall be prepared for one or more key contaminants for each monitored water-bearing zone, as appropriate. The report shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical groundwater sampling results shall be included in the second semiannual report each year. The report shall describe any significant increases in contaminant concentrations since the last report, and any measures proposed to address the increases.

    d. Soil Vapor Extraction: If applicable, the report shall include soil vapor extraction results in tabular form. The report shall also include contaminant removal results from remediation systems (e.g., soil vapor extraction), expressed in units of chemical mass per day and mass for the quarter. Historical mass removal results shall be included in the second semiannual report each year.

    e. Status Report: The semiannual report shall describe relevant work completed during the reporting period (e.g., site investigation, interim remedial measures) and work planned for the following reporting period.

4. **Violation Reports:** If the Dischargers violates requirements in the Order then the Dischargers shall notify the Regional Water Board office by telephone as soon as practicable once the Dischargers have knowledge of the violation. Regional Water Board staff may, depending on violation severity, require the Dischargers to submit a separate technical report on the violation within five working days of telephone notification.

5. **Other Reports:** The Dischargers shall notify the Regional Water Board in writing prior to any Source Property activities, such as construction or underground tank removal, which have the potential to cause further migration of contaminants, or which would provide new opportunities for Site investigation.

6. **Revisions:** Revisions to the Self-Monitoring Program may be ordered by the Executive Officer, either on his/her own initiative or at the request of the Dischargers. Prior to making revisions, the Executive Officer will consider the burden, including costs, of associated self-monitoring reports relative to the benefits to be obtained from these reports.