CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

CLEANUP AND ABATEMENT ORDER
NO. R2-2025-XXXX for:

CALIFORNIA INDUS, INC. DBA CONCORDE CLEANERS
HAN (aka HUMAYUN) KHAN
KUMAR RAMESH
PARMAR NALINI
RICK AND CYNTHIA WOODLAND
2700 WILLOW PASS, LLC

For the property located at:

2700 WILLOW PASS ROAD
CONCORD
CONTRA COSTA COUNTY

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

1. **Site Location:** The property addressed by this Order is located at 2700 Willow Pass Road in a mixed commercial/residential area of Concord, Contra Costa County (Source Property). It is approximately 0.2 acres, bounded to the north by Willow Pass Road and Crossroads High School, to the east by Super Liquor and Gas, to the south by a residential property, and to west by 2nd Street.

2. **Site History:** The building at the Source Property was constructed circa 1946 and divided into two tenant spaces. This Order relates to the historical operations in the western portion of the building. Several businesses (County Office Machine Co, Fleury's Floor Covering, Campbell and Campbell, Inc., and Willow Pass Pharmacy) operated out of the building between 1946 and 1985. From 1985 to 2002, California Indus., Inc. dba Concorde Cleaners operated at the building. The United Methodist Church extension owned and operated at the property from 2002 to 2008. In 2008, the building was purchased by Rick and Cynthia Woodland, who operated Minuteman Press on the site until its sale in 2022 to 2700 Willow Pass, LLC. ABC Imaging currently operates out of the western portion of the building. The eastern portion is used for storage.

   The following tables summarize the ownership and tenant history based on a review of available historical records:

Source Property Owners	
Time Period	**Property Owner**
2022 to Present	2700 Willow Pass, LLC
2008-2022	Rick and Cynthia Woodland
2003-2008	United Methodist Church Extension
1988-2003	Cosimo and Gloria Alioto
1982	Wallace and Evelyn Hayes; James and Jo Ann De Mattei; Cosimo and Gloria Alioto (Evelyn Hayes granted her interest to Wallace Hayes in 1985)
Before 1982	Manuel and Yolanda Peinado

Known Source Property Tenants	
Time Period	**Property Tenant**
2022 to Present	ABC Imaging
2008-2022	Minuteman Press
2002-2008	United Methodist Church Extension
1985-2002	Concorde Cleaners
c. 1974-1984	County Office Machine

3. **Named Dischargers:** Concorde Cleaners operated a dry cleaning facility at the property and used PCE in its dry cleaning operations that resulted in the initial discharge to groundwater of chlorinated solvents. The discharges of PCE are consistent with common industry-wide operational practices at dry cleaners that operated from the 1960s to 1990s, as explained below. Evidence of PCE use is supported by a note attached to a 1985 building permit request by Concorde Cleaners indicating that tetrachloroethene (PCE) would be used onsite in connection with a dry cleaning operation.

   California Indus, Inc., Han (aka Humayun) Khan, Parmar Nalini, and Kumar Ramesh each owned and/or operated Concorde Cleaners at various times. They are named as dischargers because each caused or permitted waste to be discharged where it discharged into waters of the state and caused a condition of pollution or nuisance. Specifically, as owners and/or operators of the dry cleaners, they discharged PCE consistent with common industry-wide operational practices for dry cleaners that operated from the 1960s to 1990s, as further explained below.

   Rick and Cynthia Woodland are named as dischargers because they owned the Source Property while there was an ongoing discharge, had knowledge of the discharge, and had the legal ability to prevent the discharge during the period of ownership. This is demonstrated by the 2008 environmental investigation

commissioned by the Woodlands concluding that PCE was detected at the Source Property.

2700 Willow Pass, LLC, is named as a discharger because it is the current owner of the Source Property on which there is an ongoing discharge, has knowledge of the discharge, and has the legal ability to control the discharge.

California Indus, Inc. dba Concorde Cleaners, Han (aka Humayun) Khan, Kumar Ramesh, Parmar Nalini, Rick and Cynthia Woodland, and 2700 Willow Pass, LLC, are collectively referred to as the Dischargers.

The Site investigations indicate that there were discharges of PCE in the area of the sanitary sewer line from the dry cleaner at the Source Property. These discharges of PCE are consistent with common industry-wide operational practices for dry cleaners that operated from the 1960s to 1990s. In 2001, 87% of dry cleaners in one Bay Area county (Santa Clara) used PCE. The prevalence of dry cleaner PCE discharges is discussed in the 2007 Santa Clara Valley Water District *Study of Potential for Groundwater Contamination from Past Dry Cleaner Operations in Santa Clara County* (Water District Study). Examples of common release mechanisms from dry cleaner operations include:

- 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 soaked into concrete and then volatilizing into indoor air;
- Spent PCE dumped onto soil behind building;
- PCE-saturated spent cartridge filters stored behind building;
- Water containing PCE (e.g., from water/solvent separator) discharged to the floor drain with leakage from the sewer lateral to soil and groundwater; and
- PCE in soil and groundwater volatilizing and intruding into indoor air.

The concentrations and distribution of PCE in groundwater at the former dry cleaner facility indicate that the dry cleaning operations at the Source Property were no different than the dry cleaners discussed in the Water District Study that discharged PCE. The highest PCE concentrations in soil vapor and groundwater are found directly beneath the room where dry cleaning solvents were used at the former dry cleaner facility. Discharges to the surface or shallow soil then impacted the groundwater.

The United Methodist Church Extension is not named as a discharger because it owned the Source Property after the dry cleaner operations and there is no evidence that it had knowledge of the ongoing discharges during its ownership of the property.

Cosimo Alioto is not named as a discharger because there is insufficient evidence that he permitted a discharge during his ownership of the Site. Gloria Alioto is not named as a discharger because she is deceased.

Manuel and Yolanda Peinado, Wallace and Evelyn Hayes, and James and Jo Ann De Mattei are not named as dischargers because their ownership preceded the activities that resulted in a discharge.

If the Regional Water Board receives or obtains additional information 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.

4. **Regulatory Status:** The Source Property is currently not subject to a Regional Water Board cleanup and abatement order.

5. **Site Hydrogeology:** The ground surface of the Source Property is primarily flat and underlain by predominately silt and clay, with 1- to 2-foot thick gravel layers. Groundwater was encountered in sandy gravel layers between 35 and 40 feet below ground surface (bgs). Groundwater in the vicinity of the Source Property typically flows to the west, towards Walnut Creek. Walnut Creek is located approximately 1 mile to the west.

6. **Remedial Investigations**

   a. **Onsite:** Investigations at the Source Property have been conducted since 2008. PCE and petroleum hydrocarbons have been detected in soil, soil vapor, groundwater, and/or indoor air. The maximum concentrations of PCE, trichloroethene (TCE), and petroleum hydrocarbons representative of current conditions are listed in the table below. Non-detect results are not shown.

Current Maximum Concentrations					
Soil (mg/kg)					
Location	**Date**	**Chemical**	**Concentration**	**ESL**	**Exposure Pathway**
B1-25	2019	PCE	0.037	0.08	Leaching to groundwater
B1-14	2019	TPH-d	7.3	1100	Leaching to groundwater
Groundwater (µg/L)					
Location	**Date**	**Chemical**	**Concentration**	**ESL**	**Exposure Pathway**
B1-36-1	2019	PCE	9.7	5.0	Drinking water
B1-36-1	2019	TCE	13	5.0	Drinking water
B2-40-W-DUP	2019	MTBE	95	5.0	Drinking water
MMW-ADJ	2019	TPH-d	200	100	Drinking water
Soil Vapor (µg/m^3)					
Location	**Date**	**Chemical**	**Concentration**	**ESL**	**Exposure Pathway**
SV-6-5	2023	PCE	43,000	67	Vapor intrusion
SV-8-10	2023	TCE	12	100	Vapor intrusion
SV-5-10	2023	Benzene	220	14	Vapor intrusion
Indoor Air (µg/m^3)					
Location	**Date**	**Chemical**	**Concentration**	**ESL**	**Exposure Pathway**
10-D	2020	PCE	16	2.0	Inhalation
10-D	2020	TCE	0.056	3.0	Inhalation
10-B	2020	Benzene	0.90	0.42	Inhalation

Key
ESL = Environmental Screening Level, San Francisco Bay Regional Water Board, 2019
mg/kg = milligram per kilogram
µg/L = microgram per liter
µg/m^3 = microgram per cubic meter
MTBE = methyl tert-butyl ether
TCE = trichloroethene
TPH-d = total petroleum hydrocarbons – diesel range
PCE = tetrachloroethene

As shown in the table above, PCE concentrations in soil vapor collected in 2023 (43,000 µg/m^3) greatly exceed the applicable Environmental Screening Level (ESL) of 67 µg/m^3. Maximum concentrations of PCE (9.7 µg/L) and TCE (13 µg/L) in groundwater also exceed their ESLs of 5 µg/L. Similarly, PCE concentrations in indoor air collected in 2020 (16 µg/m^3) exceed the ESL for the inhalation exposure pathway (2 µg/m^3). Investigations indicate that concentrations of volatile organic compounds (VOCs) in soil vapor are the source of the contamination that is affecting

indoor air quality at the Source Property. Vapor mitigation and/or remedial actions are needed to reduce the concentrations of VOCs in indoor air and concentrations observed in the subsurface to protect human health. Additional investigations are needed to fully characterize existing groundwater contamination. Onsite petroleum contamination is being addressed by the Regional Water Board through the oversight of the adjacent and upgradient underground storage tank cleanup case described in Finding 6.b below; not through this Order.

b. **Offsite:** Super Liquor Food & Gas at 2714 Willow Pass Road, directly adjacent and upgradient of the Source Property, has an open leaking underground storage tank cleanup case overseen by the Regional Water Board, where contamination is being addressed through ongoing remediation. Investigations at the site have documented impacts of MTBE, benzene, and TPH-d, along with other petroleum contaminants, to groundwater. This is the likely source of petroleum contaminants to the property at 2700 Willow Pass Road. No chlorinated solvents such as TCE and PCE have been detected on the adjacent property during environmental site investigations, indicating that 2714 Willow Pass Road is not the source of the chlorinated solvents at the Source Property.

7. **Previous Remedial Activities:** No remedial activities have been documented at the site. In 2021, to mitigate indoor air exposure to PCE, three crawl space vents were installed to pump air from the crawlspace to the outside and the HVAC system was modified to maintain positive air flow pressure inside the building. However, a site inspection in 2024 confirmed that these measures were not consistently implemented.

8. **Basis for Cleanup Levels**

a. **General:** State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California," applies to this discharge. It 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. This Order and its requirements are consistent with Resolution No. 68-16.

Resolution 92-49: 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. Any alternative cleanup level less stringent than background levels must comply with section 2550.4 of title 23 of the California Code of Regulations and must be consistent with the maximum

benefit to the people of the state, not unreasonably affect present and anticipated beneficial uses of water, and not result in exceedance of applicable water quality objectives. Based on current technology and site hydrogeology, cleanup of groundwater and soil to background is likely technologically and economically infeasible. On March 13, 2024, the Regional Water Board required the development of alternative cleanup levels pursuant to Water Code section 13267. The accepted cleanup levels are listed in section B (Remedial Action Plan and Cleanup Levels) of this Order. Cleanup to maximum contaminant levels (MCLs) is the best water quality that is reasonably achievable. Cleanup to MCLs is consistent with the maximum benefit of the people, will sufficiently protect human health and the environment, and will not unreasonably affect present and potential beneficial uses of groundwater. Cleanup to levels lower than MCLs is generally not technologically achievable, and any additional human health protection gained by attempting to reach background concentrations would not justify the additional costs.

b. **Beneficial Uses:** The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the 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 Water Board and approved by the State Water Resources Control Board, Office of Administrative Law and the U.S. EPA, where required.

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 TDS, low yield, or naturally high contaminant levels. Groundwater underlying and adjacent to the Source Property qualifies as a potential source of drinking water.

The Basin Plan designates the following potential beneficial uses of groundwater underlying and adjacent to the Source Property:

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

c. **Basis for Groundwater Cleanup Levels:** The groundwater cleanup levels are based on applicable water quality objectives and are the more stringent of U.S. EPA and California primary MCLs. Cleanup to this level will protect beneficial uses of groundwater and will result in acceptable residual risk to humans.

d. **Basis for Soil Cleanup Levels:** The soil cleanup levels are intended to prevent leaching of contaminants to groundwater and will result in acceptable residual risk to humans.

e. **Basis for Soil Vapor Cleanup Levels:** The soil vapor cleanup levels are intended to prevent vapor intrusion into occupied buildings and will result in acceptable residual risk to humans.

f. **Basis for Indoor Air Cleanup Levels:** The indoor air cleanup levels are intended to prevent unhealthy levels of VOCs in indoor air as a result of vapor intrusion.

9. **Future Changes to Cleanup Levels:** If new technical information indicates that the established cleanup levels are significantly over-protective or under-protective, the Regional Water Board will consider revising those cleanup levels.

10. **Remedial Action Plan and Risk Management Plan:** On November 1, 2024, 2700 Willow Pass, LLC submitted a *Remedial Action Plan and Conceptual Site Model* that included a feasibility study evaluating alternative final remedial actions, recommended final remedial actions and cleanup levels, Conceptual Site Model, and Risk Management Plan (RMP). The report selects excavation, soil vapor extraction, and replacement of the sanitary sewer line as the preferred remedy at the Source Property (i.e., Alternative 2). The conceptual site model locates the bulk of existing contamination at the Source Property in shallow soil, and soil vapor between 5 to 15 feet bgs. Groundwater was first encountered in borings between 35 to 40 feet bgs. The selected remedy is expected to achieve remedial objectives within 3 to 5 years after startup. The RMP details methods for mitigating risks of PCE exposure during construction, and the following operation and maintenance phase of remediation. The Regional Water Board approved the Remedial Action Plan on November 11, 2024.

11. **Cleanup and Abatement and Reporting 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. Findings 3 and 6 explain why the Dischargers are named and that the discharges that have created a condition of pollution. Pursuant to Water Code section 13304, this Order requires the Dischargers to clean up the waste discharged and abate its effects.

12. **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.

13. **Human Right to Water:** Under Water Code section 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. (Wat. 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 achieve maximum contaminant levels designed to protect human health and ensure that water is safe for domestic use.

14. **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.

15. **Notification:** The Regional Water Board has notified the Dischargers 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 Water Code, that the Dischargers (or their agents, successors, or assigns) shall clean up and abate the effects of the waste 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. CLEANUP LEVELS

1. **Groundwater Cleanup Levels:** The following groundwater cleanup levels shall be met in all wells identified in the attached Self-Monitoring Program:

Constituent	Concentration (µg/L)	Basis
PCE	5	Drinking Water MCL
TCE	5	Drinking Water MCL

cis-1,2-DCE	6	Drinking Water MCL
trans-1,2-DCE	10	Drinking Water MCL
Vinyl chloride	0.5	Drinking Water MCL

2. **Soil Cleanup Levels:** The following soil cleanup levels shall be met in all onsite vadose zone soils:

Constituent	Concentration (mg/kg)	Basis
PCE	0.080	Leaching to Groundwater
TCE	0.085	Leaching to Groundwater
cis-1,2-DCE	0.19	Leaching to Groundwater
trans-1,2-DCE	0.65	Leaching to Groundwater
Vinyl chloride	0.0015	Leaching to Groundwater

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

Constituent	Concentration (µg/m^3)	Basis
PCE	67	Vapor Intrusion
TCE	100	Vapor Intrusion
cis-1,2-DCE	1,200	Vapor Intrusion
trans-1,2-DCE	12,000	Vapor Intrusion
Vinyl chloride	5.2	Vapor Intrusion

4. **Indoor Air Cleanup Levels:** The following indoor air cleanup levels shall be met in occupied onsite buildings:

Constituent	Concentration (µg/m^3)	Basis
PCE	2	Inhalation
TCE	3	Inhalation
cis-1,2-DCE	35	Inhalation
trans-1,2-DCE	350	Inhalation
Vinyl chloride	0.16	Inhalation

C. TASKS

1. IMPLEMENT REMEDIAL ACTION PLAN (RAP)

COMPLIANCE DATE: In accordance with the approved schedule

Implement the approved RAP and Risk Management Plan described Finding 10 in accordance with the approved schedule.

2. RAP PROGRESS REPORT

COMPLIANCE DATE: August 1, 2025

Submit a technical report acceptable to the Executive Officer adequately documenting the status of RAP implementation, including ongoing and completed actions. For ongoing actions, such as soil vapor extraction, the report shall document start-up as opposed to completion.

3. ADDITIONAL PHASE INVESTIGATION WORKPLAN (IF NEEDED)

COMPLIANCE DATE: 60 days after required by Executive Officer

The Executive Officer will require an additional investigation workplan if monitoring results show that the contamination is not defined in all media, vertically and laterally, exceeding the cleanup levels defined in section B of this Order. If required by the Executive Officer, submit a workplan acceptable to the Executive Officer to complete the definition of contamination in all media, vertically and laterally, exceeding the PCGs. The workplan shall consider all relevant contaminants, exposure pathways, and receptors. The workplan shall specify a proposed schedule for implementation.

4. **COMPLETION OF ADDITIONAL PHASE INVESTIGATION (IF NEEDED)**

COMPLIANCE DATE: In accordance with schedule approved in Task 3

Complete additional investigation to fully delineate impacts to soil, groundwater, soil vapor, and indoor air. Submit a report acceptable to the Executive Officer documenting its completion. The report shall include results of the additional investigation.

5. **WORKPLAN FOR ADDITIONAL REMEDIAL ACTION (IF NEEDED)**

COMPLIANCE DATE: 60 days after required by Executive Officer

The Executive Officer will require this workplan if monitoring results show that remediation has been insufficient at reaching case closure in a reasonable timeframe. If required by the Executive Officer, submit a workplan acceptable to the Executive Officer that will propose additional remedial actions that will eliminate unacceptable threats to human health and restore beneficial uses of groundwater in a reasonable timeframe. The workplan must describe all significant implementation steps and must include an implementation schedule.

6. **IMPLEMENTATION OF ADDITIONAL REMEDIAL ACTION (IF NEEDED)**

COMPLIANCE DATE: In accordance with schedule approved in Task 5

Complete the tasks in the approved workplan for additional remedial action (Task 5) and submit a report acceptable to the Executive Officer documenting the completion of remedial actions.

7. **PROPOSED DEED RESTRICTION (IF NEEDED)**

COMPLIANCE DATE: 60 days prior to the Dischargers requesting case closure

Submit a proposed deed restriction acceptable to the Executive Officer to limit Source Property occupants' exposure to any residual contaminants at the Source Property to acceptable levels. The proposed deed restriction shall notify future owners of any remaining subsurface contamination at the Source Property, prohibit the use of shallow groundwater beneath the Source Property as a source of drinking water until cleanup levels are met, and require that all uses and development of the Source Property shall be consistent with any applicable Board order or risk management plan. The proposed deed restriction shall incorporate by reference a risk management plan. The proposed deed restriction shall name the Regional

Water Board as a beneficiary and shall anticipate that the Regional Water Board will be a signatory.

8. **RECORDATION OF DEED RESTRICTION (IF NEEDED)**

COMPLIANCE DATE: 60 days after Executive Officer approval of the proposed deed restriction

Submit the executed deed restriction that has been duly signed by all parties and has been recorded with the appropriate County Recorder. The property owner shall be responsible for this task.

9. **FIVE-YEAR STATUS REPORT**

COMPLIANCE DATE: August 1, 2030, and every five years thereafter

Submit a technical report acceptable to the Executive Officer evaluating the effectiveness of the approved remedial action plan. 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; and
- Additional remedial actions proposed to meet cleanup levels (if applicable) including 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.

10. **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 cleanup levels have been met, contaminant concentrations are stable, and contaminant migration potential is minimal.

11. **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.

12. **EVALUATION OF NEW HEALTH CRITERIA**

COMPLIANCE DATE: As 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.

13. **EVALUATION OF NEW TECHNICAL INFORMATION**

COMPLIANCE DATE: As 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 the Source Property. 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, and the Regional Water Board or Executive Officer may consider a revision to this Order.

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 (O&M):** 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 Source Property 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 Source Property and Records:** 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 USEPA 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 documents in electronic format to the State Water 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. Please note that this requirement includes all analytical data, monitoring well information (latitudes, longitudes, elevations, and water depth), site maps, and boring logs. 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 of any changes in contact information, occupancy, or ownership associated with the Source Property.

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 submitted to 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 Office of Emergency Services 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.

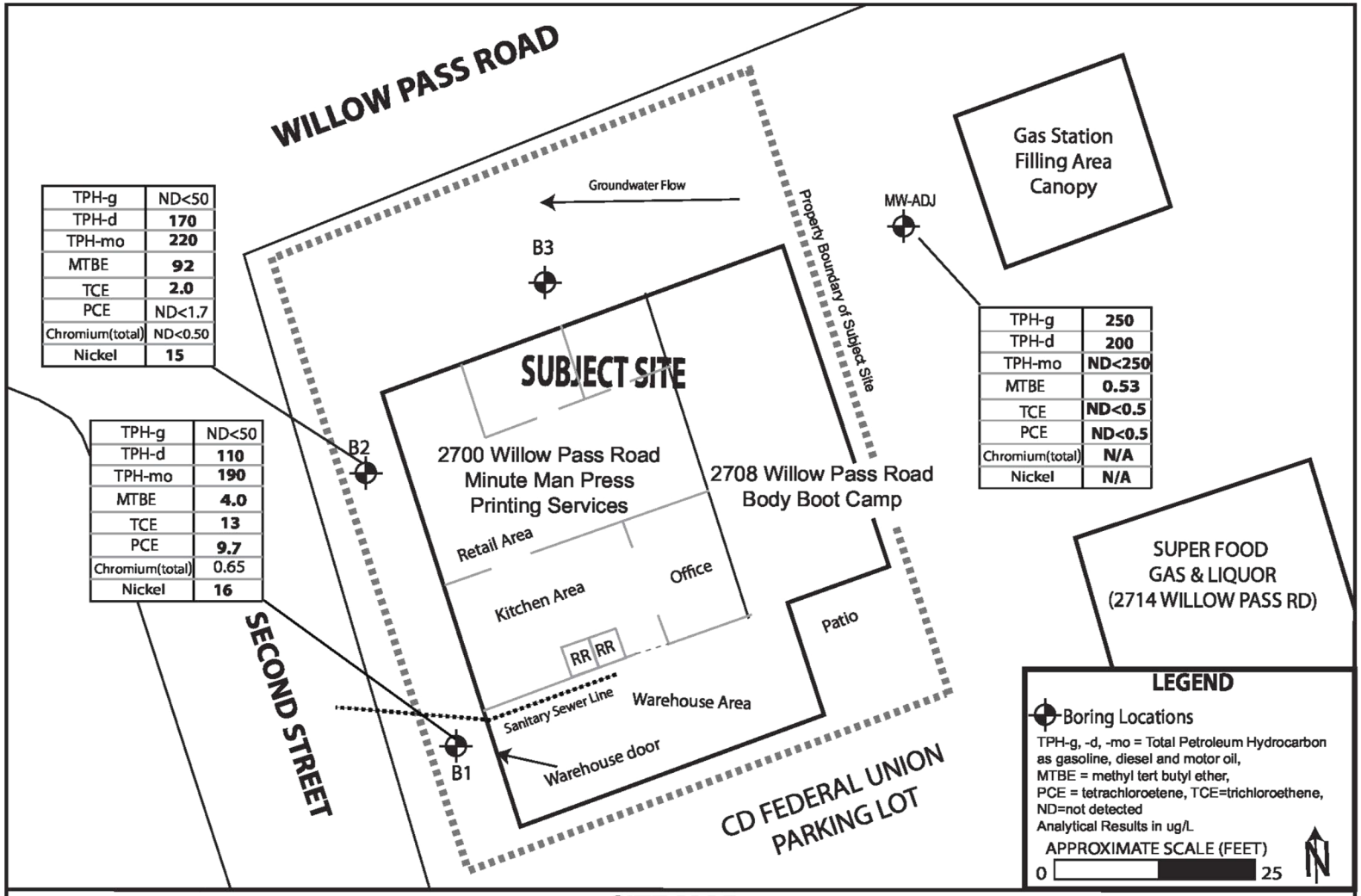
12. **Compliance Notice:** Failure to comply with the requirements of this Order and the attached monitoring program requirements may subject you to enforcement action, including but not limited to imposition of administrative civil liability under Water Code sections 13350 and/or 13268, or referral to the Attorney General for injunctive relief or civil or criminal liability.

So ordered.

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

Attachments:

Site Plan
Self-Monitoring Program



TPH-g	ND<50
TPH-d	170
TPH-mo	220
MTBE	92
TCE	2.0
PCE	ND<1.7
Chromium(total)	ND<0.50
Nickel	15

TPH-g	250
TPH-d	200
TPH-mo	ND<250
MTBE	0.53
TCE	ND<0.5
PCE	ND<0.5
Chromium(total)	N/A
Nickel	N/A

TPH-g	ND<50
TPH-d	110
TPH-mo	190
MTBE	4.0
TCE	13
PCE	9.7
Chromium(total)	0.65
Nickel	16

SITE MAP

Boring Locations and Groundwater Analytical Results

2700 and 2708 WILLOW PASS ROAD

CONCORD, CALIFORNIA

SCHUTZE & Associates, Inc.

Project No. SCS677.2

FIGURE 2

December 2019

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM for:

CALIFORNIA INDUS, INC. DBA CONCORDE CLEANERS
HAN KHAN
KUMAR RAMESH
PARMAR NALINI
RICK AND CYNTHIA WOODLAND
2700 WILLOW PASS, LLC

for the property located at:

2700 WILLOW PASS ROAD
CONCORD, CONTRA COSTA 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-XXXX (Order). The burden, including costs, of the technical and monitoring reports, bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The cost of preparing these reports, including the costs of hiring a consultant and completing the reports, is estimated to be $10,000 to $30,000 annually. 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 define the extent of pollution, including the extent of PCE and its breakdown products in groundwater, soil vapor, and indoor air; to identify the threats the pollution poses to human health or water quality; and to provide field data to support the Dischargers' design of mitigation and remediation systems. The benefits of the reports include restoration of beneficial uses and the protection of public health and the environment.

2. **Monitoring:** The following tables outline the monitoring requirements for soil vapor, groundwater, and indoor air.

   Soil Vapor
   The Dischargers shall collect and analyze representative samples of soil vapor according to the following table:

Soil Vapor Probe Identification	Screen (feet bgs)	Sampling Frequency	Analyses
SV-1	5 & 10	Quarterly for 1 year; Semi-Annually after	TO-15
SV-2	5 & 10	Quarterly for 1 year; Semi-Annually after	TO-15
SV-3	5 & 10	Quarterly for 1 year; Semi-Annually after	TO-15
SV-4	5 & 10	Quarterly for 1 year; Semi-Annually after	TO-15
SV-5	5 & 10	Quarterly for 1 year; Semi-Annually after	TO-15
SV-6	5 & 10	Quarterly for 1 year; Semi-Annually after	TO-15

Key:
TO-15 = USEPA Method TO-15 or equivalent
Note:
Passive sampling cannot be used.

Groundwater
The Dischargers shall collect and analyze representative samples of groundwater according to the following table:

Groundwater Well Identification	Screen (feet bgs)	Sampling Frequency	Analyses
TBD-1	TBD	Quarterly	8260
TBD-2	TBD	Quarterly	8260
TBD-3	TBD	Quarterly	8260

Indoor Air
The Dischargers shall collect and analyze representative samples of indoor air in occupied areas according to the following table:

Indoor Air Identification	Sampling Frequency	Analyses
IA-7	Monthly [1]	TO-15
IA-8	Monthly [1]	TO-15
IA-10	Monthly [1]	TO-15
TBD	Monthly [1]	TO-15

Key:
TBD = Locations to be determined based on changes in occupancy
TO-15 = USEPA Method TO-15 or equivalent
Notes:

[1] The Dischargers can request, and the Executive Officer may approve, a reduced monitoring frequency after three successive monitoring events show indoor air concentrations below cleanup levels specified in section B.5 of this Order, as may be amended by the Executive Officer in accordance with Provision 5 of this Order and section 7 of this Self-Monitoring Program.

Passive sampling cannot be used.

Indoor air locations based on those provided in the 2021 Follow-Up Indoor Air Survey report. Additional locations may need to be added if additional areas become occupied.

3. **Monitoring Reports:** The following section outlines the monitoring requirements for soil vapor and indoor air, and general reporting requirements for all media.

Soil Vapor and Groundwater

The Dischargers shall submit combined annual soil vapor and groundwater monitoring reports to the Regional Water Board no later than 30 days following the end of the year (e.g., annual reports are due January 30). At a minimum, the monitoring reports shall include:

a. Analyses: Soil vapor and 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 soil vapor zone, as appropriate in the reports. The reports shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical sampling results shall be included in the reports. The report shall describe any significant increases in contaminant concentrations since the last report, and any measures proposed to address the increases.

Indoor Air

The Dischargers shall submit monthly indoor air monitoring reports to the Regional Water Board no later than 30 days following the end of the month. At a minimum, the monitoring reports shall include:

b. Indoor Air Analyses (and any other necessary media): Indoor air sampling data shall be presented in tabular form, and a map shall be prepared for one or more key contaminants. The reports shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical indoor air sampling results shall be included in the reports. The report shall describe any significant increases in contaminant concentrations since the last report, and any measures proposed to address the increases. Other media may need to be

monitored to demonstrate the effectiveness of the mitigation measures at controlling VOC concentrations in indoor air.

c. Mitigation Measures: A summary of mitigation measures shall be provided in the monthly monitoring reports. An evaluation of the effectiveness of the mitigation measures at controlling VOC concentrations in indoor air shall also be provided. If indoor air concentrations continue to exceed the indoor air risk management levels, contingent actions as identified in the RMP shall be proposed to be taken within specified timeframes. Monthly indoor air monitoring reports are required to be submitted until concentrations are consistently below the indoor air risk management levels.

General

At a minimum, all monitoring reports shall include:

d. 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 Dischargers or their duly authorized representative(s), and shall include a statement by the signatories, under penalty of perjury, that the report is true and correct to the best of the signatories' knowledge.

e. Remediation Performance: The report shall include performance results for all remediation systems. For soil vapor extraction, the report shall include mass removal rates presented in tabular form. For enhanced bioremediation, the report shall demonstrate performance using multiple lines of evidence, such as decreasing concentrations for parent daughter compounds, geochemical analysis, and microbial analysis.

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

4. **Violation Reports:** If the Dischargers violate requirements in the Order then the Dischargers shall notify the Regional Water Board 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, that have the potential to cause further migration of contaminants or would provide new opportunities for site investigation.

6. **Record Keeping:** The Dischargers or their agent(s) shall retain data generated for the above reports, including lab results and QA/QC data, for a minimum of six

years after origination and shall make them available to the Regional Water Board upon request.

7. **Self-Monitoring Program Revisions:** Revisions to the Self-Monitoring Program may be ordered by the Executive Officer, either on their 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.