



Magnolia Flats Mixed-Use Project

Appendix H

No Further Action Letter - One-Hour Dry Cleaner



Santa Ana Regional Water Quality Control Board

January 9, 2020

Mr. Troy D. Stephen
SFI Magnolia Avenue – Riverside LLC
13727 Noel Road, Suite 150
Dallas, Texas 75240
(tstephan@istar.com)

**DETERMINATION OF NO FURTHER ACTION –
FORMER ONE HOUR DRY CLEANER AT 10491 MAGNOLIA AVENUE, RIVERSIDE,
CALIFORNIA (GLOBAL ID: T10000005201; PCA # 2080107)**

Dear Mr. Stephen,

Our staff has reviewed the “*Petition for No Further Action*”, dated June 24, 2019. The referenced documents were prepared and submitted by Geosyntec Consultants (Geosyntec) on behalf of SFI Magnolia Avenue – Riverside LLC (SFI Magnolia Avenue) for the former One Hour Dry Cleaner located in Unit C of the retail plaza at 10491 Magnolia Avenue in Riverside (Site).

This letter summarizes the findings from the Site investigations and remedial efforts and provides a no further action (NFA) determination for the Site.

Background

The former One Hour Dry Cleaner facility operated from 1997 to 2010 at the retail plaza at the above referenced address. The Site is now vacant. Results from previous environmental investigations indicated that volatile organic compounds (VOCs) are present in the subsurface soil and soil vapor as a result of past discharges of waste at the former dry cleaners. The retail plaza is bounded by a Montessori School to the south, a retail strip building to the southeast, a mobile home park to the west and a vacant lot to the north and east. The current vacant lot southeast of the Site at 10451 Magnolia Avenue was formerly used as a Unocal-branded gasoline station (Unocal site), which has also conducted environmental investigations and remediation under the oversight of this Regional Board.

Environmental Impacts

WILLIAM RUH, CHAIR | HOPE SMYTHE, EXECUTIVE OFFICER

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P19-0683 (PPE) & P20-0133 (CUP) Exhibit 9 - Appendix N
Checklist and Appendices 10411-10481 Magnolia Avenue

In 2012, the Unocal site conducted a soil vapor assessment to evaluate potential vapor intrusion issues at the adjacent Montessori School. As part of this investigation, nested soil vapor probes were installed at three locations near the Montessori School and the former One Hour Dry Cleaner. During this investigation, both petroleum hydrocarbons, and chlorinated VOCs (associated with tetrachloroethene [PCE] used at the former dry cleaner) were discovered. Based on this evidence of chlorinated impacts, SFI Magnolia Avenue entered into a voluntary agreement under the State Water Board's Oversight Cost Reimbursement Program to investigate and remediate the chlorinated VOCs at the Site under the oversight of Regional Water Board staff. SFI Magnolia Avenue retained Geosyntec to performed various environmental investigation and remediation activities at the Site.

Vapor Intrusion Sampling at the Montessori School

In October 2014, Geosyntec performed indoor air, ambient air, and sub-slab vapor sampling to evaluate whether vapor intrusion was occurring at the Montessori School. PCE and benzene were consistently detected in indoor air and sub-slab soil vapor.

Indoor air

PCE and benzene were detected in the indoor air at maximum concentrations of 0.25 and 1.3 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), respectively. In comparing the data to the indoor air environmental screening levels (ESLs) established by the San Francisco Bay Regional Board in 2016, PCE concentrations were below its respective ESL while benzene concentrations exceeded its respective ESL. Despite the low PCE concentrations in the indoor air, its detection suggests that the vapor intrusion pathway from the subsurface to the interior of the building is complete and could worsen in the future. Furthermore, benzene detections above its respective ESL could be considered as a current risk to human health. In consideration of the indoor air impacts, we recommended additional indoor air monitoring and remediation of subsurface vapors to mitigate the associated current risks.

Soil vapor

PCE and benzene were detected in the sub-slab vapor at maximum concentrations of 470 and 250 $\mu\text{g}/\text{m}^3$, respectively. Both PCE and Benzene were detected at concentrations above their respective soil vapor ESLs. Because these elevated soil vapor concentrations could be a future risk to human health, we recommended additional soil vapor monitoring and remedial action and mitigation measures to address the associated future risks.

Groundwater Investigation

PCE has been consistently absent (analytical results of "non-detect") in groundwater samples from on-Site groundwater monitoring well GW-1. Minor concentrations of PCE were detected sporadically in Unocal's groundwater monitoring well network. However, due to low concentrations and the spatial distribution of the contamination, we did not request further groundwater investigations from SFI Magnolia Avenue.

1st Remedial Action: Soil Vapor Extraction

In early 2015, Geosyntec implemented soil vapor extraction (SVE) using three dual-nested soil vapor extraction wells screened from 5-20 and 25-40 feet below ground surface (bgs), respectively. The SVE system operated from January 20 to February 19, 2015 (approximately one month). During SVE operation, field monitoring of the extracted vapors indicated increasing VOC concentrations which led to more frequent carbon change-outs than anticipated. The laboratory analysis of the extracted soil vapor indicated that the VOCs were predominantly

gasoline range petroleum hydrocarbons (TPHg) and, to a lesser extent, the chlorinated compounds associated with dry cleaning. As a result of this finding, SFI Magnolia Avenue decided to shut down the SVE system on February 19, 2015 because they did not believe that the former dry cleaner property was a source of the petroleum hydrocarbons. Despite SFI's assertion, we concluded that inaction was not acceptable. In an effort to prioritize the protection of human health, we recommended that representatives of both the One Hour Dry Cleaner and Unocal sites meet to determine a viable solution to protect the occupants at the Montessori School.

Historical Land Use Evaluation to Determine the Petroleum Hydrocarbon Source

During a meeting on July 25, 2015, we requested that SFI Magnolia Avenue perform a historical land use evaluation of the Site and its vicinity with the goal of identifying potential sources of petroleum hydrocarbons. Evidence of petroleum hydrocarbon releases were not found from the properties located within 1/8 mile of the Site, with the exception of the known release at the former Unocal site.

Benzene Source Investigation

Although the evidence from the investigations suggested that the benzene contamination was not directly attributable to the former dry cleaner operations, the possibility that historical discharges associated with a different land use at that site could not be ruled out. Since benzene is more typically associated with petroleum hydrocarbons (such as those identified at the Unocal site), our staff requested further investigation by Unocal. However, Unocal refused to collaborate with SFI Magnolia Avenue on investigating the source of the benzene impacts that had been identified at the Montessori School. SFI Magnolia Avenue voluntarily conducted several additional phases of investigation between 2015 and 2019, in an effort to identify the benzene source.

In summary, the multiple phases of investigation have consistently confirmed that the former One Hour Dry Cleaner property was not a source of benzene contamination. However, based on the data from these investigations, a source for benzene was not conclusively identified.

Planned Redevelopment

SFI Magnolia Avenue has informed our staff of its plans to redevelop the Site and surrounding vicinity into 381 three-story apartment units and two retail/commercial units in addition to a club house and other amenities such as community park and swimming pool. The portion of the redevelopment plan where the Site is currently located is proposed to be a storm water detention area. Because of the possible presence of residual soil contamination beneath the Site, water percolating through the soil could result in leaching of residual chemicals and transport those chemicals to groundwater. On September 14, 2016, SFI Magnolia Avenue presented a proposed redevelopment plan which included excavation activities beneath the former building to mitigate residual contamination and mitigate potential concerns regarding the leaching of contamination to groundwater.

2nd Remedial Action: Soil Excavation

In consideration of the planned redevelopment, we recommended excavation of soil beneath the former One Hour Dry Cleaner tenant suite, since the area would be easily accessible after demolition of the on-Site building. Furthermore, we recommended performing soil vapor sampling before and after excavation activities. We indicated that excavation would reduce

residual PCE mass, and the soil vapor sampling would provide an opportunity to verify that the One Hour Dry Cleaner is not a source of benzene. SFI Magnolia agreed to perform the excavation and soil vapor monitoring activities.

Pre-excavation Vapor Intrusion Assessment at the Montessori School

In May 2018, prior to soil excavation activities at the former One Hour Dry Cleaner, Geosyntec conducted indoor air and soil vapor sampling at the Montessori School.

1. Indoor air - PCE and benzene were detected in the indoor air at a maximum concentration of 1 and 0.38 $\mu\text{g}/\text{m}^3$, respectively. Both PCE and benzene concentrations exceeded their respective indoor air ESLs.
2. Soil vapor - PCE and benzene were detected in the soil vapor at a maximum concentration of 210 and 100 $\mu\text{g}/\text{m}^3$, respectively. Only the benzene concentration exceeded its respective soil vapor ESL.

Excavation Activities

In July 2018, Geosyntec conducted soil excavation activities and removed approximately 32.6 cubic yards of soil beneath the former dry cleaning equipment, floor drain, and sewer line areas. PCE was detected in soil at concentrations ranging between 0.57J and 2.4J micrograms per kilogram ($\mu\text{g}/\text{kg}$), which is significantly lower than its soil ESL of 420 $\mu\text{g}/\text{kg}$. Furthermore, benzene was detected in a single soil sample at a concentration of 25 $\mu\text{g}/\text{kg}$, which is lower than its soil ESL of 44 $\mu\text{g}/\text{kg}$.

Post-excavation VI Assessment at the Montessori School

In September 2018, after completion of soil excavation activities at the former One Hour Dry Cleaner, Geosyntec conducted an additional round of indoor air and soil vapor sampling at the Montessori School.

1. Indoor air - PCE was not detected in indoor air. Benzene was detected in the indoor air at a maximum concentration of 0.97 $\mu\text{g}/\text{m}^3$ which is above its indoor air ESL. In comparison to the pre-excavation concentrations, PCE concentration has decreased from 1 $\mu\text{g}/\text{m}^3$ to non-detect and benzene concentration has increased from 0.38 to 0.97 $\mu\text{g}/\text{m}^3$.
2. Soil vapor - PCE and benzene were detected in the soil vapor at maximum concentrations of 250 and 72 $\mu\text{g}/\text{m}^3$, respectively. Both PCE and benzene concentrations exceeded their respective soil vapor ESLs. In comparison to the pre-excavation concentrations, PCE increased from 210 to 250 $\mu\text{g}/\text{m}^3$ while benzene concentration decreased from 100 to 72 $\mu\text{g}/\text{m}^3$. Soil vapor concentrations of PCE and benzene beneath the Montessori School are still elevated; however, the concentrations have consistently decreased in the area between the school and the former One Hour Dry Cleaner.

Final Soil Vapor Investigation to Identify the Source of Benzene Contamination

On November 27, 2018, we recommended an expanded soil vapor investigation in the vicinity of the Montessori School and the Unocal site as a final attempt to identify a benzene source within the vicinity of the Site before closing the case. In March 2019, Geosyntec conducted the expanded soil vapor investigation. PCE and benzene were sporadically detected above their respective laboratory reporting limits; however, none of the detected concentrations were above their respective soil vapor ESLs with one exception; PCE was detected at SV-15-10 at 280 $\mu\text{g}/\text{m}^3$ which is slightly above the soil vapor ESL of 240 $\mu\text{g}/\text{m}^3$. The results of this investigation provided additional evidence that the former One Hour Dry Cleaner is not a source of the benzene contamination.

Determination of No Further Action

Based on our review of the soil, soil vapor, indoor air, and groundwater data, it does not appear that the residual concentration of PCE and benzene at the Site will pose a risk to human health or a threat to the beneficial uses of groundwater in the Arlington Groundwater Management Zone. Therefore, on the condition that the information provided to us was accurate and representative of the existing conditions at the Site, no further action is necessary with respect to the low levels of VOCs in the shallow subsurface at the Site.

Please note that you will receive at least one additional invoice for the current billing period, which will include the costs of our oversight of the final activities at the Site, review of the technical reports, and preparation of this no further action determination letter.

If you have any questions, please contact Alan Kuoch at (951)782-4962 or by e-mail at: alan.kuoch@waterboards.ca.gov or you may contact Nick Amini, Chief of the Site Cleanup Section, at (951)782-7958, or by e-mail: nick.amini@waterboards.ca.gov.

Sincerely,


Hope Smythe
Executive Officer

cc: Eric Brooks – iStar Financial (ebrooks@istar.com)
Mital Desai – Geosyntec Consultants (mdesai@geosyntec.com)
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