

---

## Central Coast Regional Water Quality Control Board

December 22, 2020

17<sup>th</sup> & Capitola, L.P.  
Huei Hsien Sally Chang  
Chuan Sheng Frank Chang  
1818 Harper Street  
Santa Cruz, CA 95026

via U.S. Mail

Dear Mr. and Ms. Chang:

**SITE CLEANUP PROGRAM: FORMER FAIRWAY DRY CLEANING AND LAUNDRY,  
1600 CAPITOLA ROAD, SANTA CRUZ, SANTA CRUZ COUNTY – REPOSE TO  
SUBMITTAL OF INFORMATION AND EXTENSION REQUEST AND CONDITIONAL  
WORKPLAN APPROVAL**

In March 2020, Weber, Hayes & Associates performed a site characterization for a development project at 1412, 1438, 1500, and 1514 Capitola Road, Santa Cruz,<sup>1</sup> which is adjacent to your property located at 1600 Capitola Road, currently referred to as the Fairway Dry Cleaning and Laundry facility (Site).<sup>2</sup> During Weber, Hayes' investigation, volatile organic compounds (VOCs), including the dry-cleaning solvent tetrachloroethylene (PCE), were detected in shallow soil vapor samples on the development property. On August 4, 2020, the Central Coast Regional Water Quality Control Board (Central Coast Water Board) issued a California Water Code section 13267 order (Order)<sup>3</sup> requiring 17<sup>th</sup> & Capitola, L.P. to submit a workplan and completed questionnaires to evaluate probable releases of PCE from historic dry cleaning operations on your property. On your behalf, Trinity Source Group, Inc. sent a response to the Order on September 28, 2020, which included completed questionnaires and information that 17<sup>th</sup> & Capitola L.P. had applied for grant funding and requested the Central Coast Water Board to extend the workplan submittal deadline until after grant funding was received.<sup>4</sup> After several communications between you, Trinity, and Central Coast Water Board staff in October and November 2020, Trinity submitted the *Preliminary Phase II Environmental Site Assessment Work Plan* (Phase II Workplan) on December 2, 2020. This letter responds to the information submittal and extension request and conditionally approves the Phase II Workplan and proposed schedule.

---

<sup>1</sup> All documents related to the Development at Capitola Road are in [GeoTracker](http://geotracker.waterboards.ca.gov/?gid=T10000014098) at: <http://geotracker.waterboards.ca.gov/?gid=T10000014098>

<sup>2</sup> All documents related to the former Fairway Dry Cleaning and Laundry are in [GeoTracker](http://geotracker.waterboards.ca.gov/?gid=T10000015553) at: <http://geotracker.waterboards.ca.gov/?gid=T10000015553>

<sup>3</sup> The Central Coast Water Board's Order dated August 4, 2020, and two related attachments, are in [GeoTracker](https://geotracker.waterboards.ca.gov/?url=c4rzg) at: <https://geotracker.waterboards.ca.gov/?url=c4rzg>

<sup>4</sup> Responses to the Order dated September 28, 2020, are in [GeoTracker](https://geotracker.waterboards.ca.gov/?url=uiy5o) at: <https://geotracker.waterboards.ca.gov/?url=uiy5o>

### **Response to Information Submittal and Extension Request**

On September 28, 2020, Trinity's email provided completed questionnaires (*Chemical Use and Storage* and *Site Audit Questionnaire*) and figures showing the locations of the current building where the former dry cleaner operated and related underground utilities. Instead of submitting the required workplan, Trinity's email contained documentation that 17<sup>th</sup> & Capitola, L.P. had applied to receive potential grant funding under the State Water Resources Control Board's Site Cleanup Subaccount Program grant funding program (SCAP).

Regarding the required workplan, Trinity requested an extension to the Order until after SCAP funds become available for use. Central Coast Water Board staff contacted SCAP as to the status of 17<sup>th</sup> & Capitola, L.P.'s grant application. Central Coast Water Board staff responded in an October 15, 2020 email indicating Trinity's request was under consideration pending evaluation of potential Site risk and the Site's relative priority ranking among other new state-wide SCAP applicants and existing SCAP-funded cleanup sites.

In subsequent telephone communications, Central Coast Water Board and SCAP staff indicated further investigatory information is needed to help determine SCAP funding priority. In response, Trinity proposed a draft scope of work for a preliminary site assessment for Central Coast Water Board staff's initial review and comment, followed by submittal of the Phase II Workplan, dated November 30, 2020, and submitted December 2, 2020.<sup>5</sup>

### **Conditional Workplan Approval**

The Phase II Workplan details a comprehensive scope of work for data collection and reporting, described as steps 1 through 4. The objective is to begin defining the distribution of PCE and related pollutants in soil, soil vapor, and groundwater. Central Coast Water Board staff reviewed the scope of work, provided response comments, and discussed a phased investigation approach with Trinity during a telephone call on December 10, 2020. As agreed during the call, Trinity will complete steps 1 and 2 and report its findings to the Central Coast Water Board for immediate evaluation. This timelier approach to evaluating preliminary field data was agreed upon to help determine if sampling locations proposed for steps 3 and 4 could be optimized toward a more complete delineation of PCE and other VOCs. Step 2 involves a passive soil gas survey to determine the general extent of PCE across the Site and thus will help focus subsequent soil and groundwater investigatory efforts for steps 3 and 4.

Lastly, as discussed in the above-cited December 10, 2020 telephone communication, the Central Coast Water Board also requires that all existing and relevant data from surrounding investigations showing indications of PCE and related pollutants be included in Trinity's final report. At least two investigation cases provide relevant data: the Capitola Road development project and Former Live Oak Service closed underground storage tank (UST) cleanup site.<sup>6</sup> The purpose of this requirement is to help provide a more comprehensive evaluation of the distribution of PCE and related

---

<sup>5</sup> The *Phase II Work Plan* is in [GeoTracker](https://geotracker.waterboards.ca.gov/?surl=wd3fq) at: <https://geotracker.waterboards.ca.gov/?surl=wd3fq>

<sup>6</sup> All documents related to the *Former Live Oak Service* closed UST cleanup site are in [GeoTracker](http://geotracker.waterboards.ca.gov/?gid=T0608700286) at: <http://geotracker.waterboards.ca.gov/?gid=T0608700286>

pollutants in all media (soil, soil vapor, and groundwater) and to develop a more complete preliminary conceptual site model. The conceptual site model is an important next step for the Central Coast Water Board's evaluation of potential Site risk and for State Water Board to determine SCAP funding priority. The conceptual site model will also help determine related next steps for site investigation and cleanup.

Within this agreed-upon framework, the Central Coast Water Board conditionally concurs with the scope of work included in the Phase II Workplan.

Regarding implementation, Section 5.2 of the Phase II Workplan has a proposed schedule for the following: a) complete pre-field work activities within the four weeks following the date of the Central Coast Water Board's concurrence with the scope of work (i.e., this letter); b) then three weeks to complete the investigation, which will involve the above agreed-upon preliminary data evaluation from step 2 prior to completing steps 3 and 4; and c) seven weeks for submittal of a final investigation report based on timing of receiving laboratory analytical data, and subsequent report preparation. The Central Coast Water Board concurs with the proposed schedule.

### **LEGAL REQUIREMENTS**

The Central Coast Water Board reviewed the site information and questionnaires and deems them in compliance with the Order. In addition, the Central Coast Water Board appreciates your expedited preparation and submittal of the SCAP application and the Phase II Workplan. Because characterization of the VOCs is an iterative approach and the Phase II Workplan is a good first step in this process, Central Coast Water Board staff does not plan on recommending enforcement of the failure to submit the workplan by September 30, 2020, as specified in the Order.

You are required to implement the scope of work included in the Phase II Workplan according to the conditions specified in this letter and the fieldwork and reporting schedules included in the scope of work. Failure to comply with these requirements may subject 17<sup>th</sup> & Capitola, L.P. to enforcement action by the Central Coast Water Board, including issuance of orders under Water Code sections 13267 and/or 13304 and potential administrative civil liabilities.

If you have any questions, please contact **Dan Niles at (805) 549-3355 or by email at [dan.niles@waterboards.ca.gov](mailto:dan.niles@waterboards.ca.gov)**, or Sheila Soderberg at (805) 549-3592.

Sincerely,

*for* Matthew T. Keeling  
Executive Officer

cc:

Suzanne Ise, Santa Cruz County, [suzanne.ise@santacruzcounty.us](mailto:suzanne.ise@santacruzcounty.us)  
Kimberly Finley, County of Santa Cruz, [kimberly.finley@santacruzcounty.us](mailto:kimberly.finley@santacruzcounty.us)

John Gerbrandt, County of Santa Cruz, [John.Gerbrandt@santacruzcounty.us](mailto:John.Gerbrandt@santacruzcounty.us)  
David Reinsma, Trinity Source Group, [dar@tsgcorp.net](mailto:dar@tsgcorp.net)  
Warren Chamberlain, Trinity Source Group, [wbc@tsgcorp.net](mailto:wbc@tsgcorp.net)  
Ashley Schweickart, MidPen Housing Corp., [aschweickart@midpen-housing.org](mailto:aschweickart@midpen-housing.org)  
Dan Niles, Central Coast Water Board, [dan.niles@waterboards.ca.gov](mailto:dan.niles@waterboards.ca.gov)  
Sheila Soderberg, Central Coast Water Board, [sheila.soderberg@waterboard.ca.gov](mailto:sheila.soderberg@waterboard.ca.gov)  
Harvey Packard, Central Coast Water Board, [harvey.packard@waterboards.ca.gov](mailto:harvey.packard@waterboards.ca.gov)  
GeoTracker file, Colin Barger, [colin.barger@waterboards.ca.gov](mailto:colin.barger@waterboards.ca.gov)

BizFlow# M30000, SCP-Reg 3 Site Specific, Fairway Dry Cleaning and Laundry, CR# 2030164

GeoTracker# T10000015553

File path: r:\rb3\shared\scp\sites\santa cruz co\santa cruz\1600 capitola road - fairway dry cleaners\13267 order\response\_to\_submittals\_per\_13267\_order\_12-2020.docx