

# DAMON CONNOLLY

SUPERVISOR, DISTRICT 1

## MARINWOOD PLAZA UPDATE

July 2015



**Dear Neighbors,**

The chemical remediation of toxins left behind by the former drycleaners at Marinwood Plaza is an ongoing process with a long and complicated history. This process is important to both the future of the Plaza property and for the health and safety of nearby neighborhoods, and is currently moving forward.

Significant work remains to be done. Typically this type of remediation work coincides with redevelopment, as accessing soil for remediation makes most sense prior to new construction. Delays in redevelopment of the site have resulted in an unfortunate extended timeline for this process.

In response, the California Regional Water Quality Control Board (CRWQCB) has mandated that the current property owners, Marinwood Plaza Property LLC (Marinwood LLC), submit a final work plan by January 1, 2016, to ensure that this process is taken care of on a defined timeline and not extended further or indefinitely. Marinwood LLC is currently engaged in developing this work plan with the CRWQCB on several fronts.

If and when Marinwood LLC sells the property to a new owner, this work plan may be amended or accelerated with new parties added to the agreement. However Marinwood LLC will remain legally responsible for completion of the remediation process regardless, per the work plan that will be submitted in the coming months.

Below you will find some facts, information and background on this process, including where it currently stands, what we can expect going forward, and how it relates to the Casa Marinwood neighborhood.

For further background, you can view all relevant documentation online at the CRWQCB website, where there is a [page specifically dedicated to this project](#). This includes reports from the CRWQCB, some relevant communications, and reports and test results from engineers. Wherever possible, we've included links to relevant reports from the CRWQCB, [all of which can be found here](#).

As this process proceeds we will continue to track it closely, and update the community with developments.

*Damon*

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## General Background and Information

The dry cleaning business which was formerly located at Marinwood Plaza, “Prosperity Cleaners,” was the source of a Tetrachloroethene release –a commonly used dry-cleaning solvent also known as PCE.

PCE contamination is a common issue for sites that hosted a dry-cleaning business during the years that Prosperity Cleaners was in operation. For most of these sites, PCE remediation is a routine procedure in the development process with no lasting impacts. The delays in the redevelopment of Marinwood Plaza have extended the timeline on this issue.

Reports dating back to August 2007 have shown concentrations of PCE in two areas: directly underneath the former drycleaner and at an area between the drycleaner and the freeway called the “Eastern Hot Spot.” This was first reported to the CRWQCB in January 2008. More recently groundwater contamination has been discovered extending to Silveira Ranch, across the freeway to the east.

In February 2014, the CRWQCB ordered Marinwood LLC to complete onsite and offsite investigations of the extent of the contamination and to prepare a cleanup plan. [This directive letter also contains significant background information, and can be found here.](#)

As of now, there are two ongoing processes that are being addressed separately: 1.) soil vapor testing and the development of a work plan for on-site remediation at the site of the former drycleaner and the Eastern Hot Spot, and 2.) offsite investigation of the extent of groundwater contamination and development of a work-plan at Silveira Ranch. Marinwood LLC is currently engaged in this investigative process using an independent, state-licensed engineering firm called Geologica.

Both of these processes are advancing with the oversight and approval of the CRWQCB. The CRWQCB is keeping our office in the line of communication on all issues related to this matter, and we are closely tracking this process as it continues to proceed and develop. **It is critical that the final work plan submitted at the end of the year addresses remediation of the source of contamination in an effective, timely, and complete manner. This is critical not only to the safety of the community, but for progress towards the community goal of a successful project at this site.**

### Who Is Responsible for Fulfilling the Terms of the Cleanup Order?

The owners of the Marinwood Plaza property, Marinwood LLC, are “named as discharger” for the site, meaning that they legally obligated to complete this remediation process within terms agreed upon with the CRWQCB. If and when Marinwood LLC sells the property to a new owner, the new owner can be added as a party to the agreement per the discretion of the CRWQCB. This would not remove Marinwood LLC from the cleanup obligation. While it would be between the current owners and potential new owners to determine who will execute the work plan with approval of the CRWQCB, the current owners will always be held legally accountable for timely progress per the work plan that is ultimately approved by the CRWQCB.

## General Background and Information

*(Cont. from Pg. 2)*

### Who Is Conducting the Testing and Remediation Work on Behalf of the Owner?

The property owners are currently engaged in this investigative process using an independent, state-licensed, engineering firm called Geologica. The CRWQCB requires that any testing or engineering be completed by a firm registered with the State Board for Professional Engineers, Land Surveyors and Geologists. Any lab used for testing also has to also be state-certified. The parties named to discharge – currently solely the plaza owners, Marinwood LLC – will always pay for these services. The CRWQCB can always follow up with their own investigations based on any doubts or misgivings in regard to work performed or test results, but any state-licensed engineering firm risks losing their license by failing to act responsibly.

### How Is PCE Contamination Assessed?

PCE contamination occurs and is being monitored around the Marinwood Plaza property in soil, soil vapor, indoor air and groundwater. As previously stated, the main concern of the CRWQCB on the Marinwood Plaza property for PCE is soil vapor, while the main concern offsite at the Silveira Ranch is PCE in groundwater.

PCE is evaluated against Environmental Screening levels, or ESLs, which are the levels that the CRWQCB has determined “prevent acute effects and unacceptable risk of cancer (less than a “one in a million” risk).” For PCE in soil vapor, the Residential ESL is 210 micrograms per cubic meter, while Commercial ESL set a limit of 2,100 micrograms per cubic meter.

Soil vapor contamination can vary dramatically –by order of magnitude –with changes in season, changes in temperature, or a host of other temporal factors. Samples taken from just a few feet apart can have the same variation. All samples taken from Marinwood Plaza are taken from 5 feet underground.

The reason that soil vapor is tested despite the potential for significant variance in sample results is because soil vapor contamination is the ultimate source of indoor air contamination. While PCE in soil vapor samples does not mean there is an immediate threat at the sampling area to those in close proximity, there is no other way to assess whether the potential for indoor air contamination exists.

## Where We Stand Today

While some testing and remediation work has already been completed, there is still critical work to be done.

As earlier stated, right now there are two ongoing separate processes: 1.) soil vapor testing and the development of a remediation work plan for on-site remediation at the site of the former drycleaner and the Eastern Hot Spot, and 2.) offsite investigation to define the extent of groundwater contamination and development of work-plan at Silveira Ranch.

### Remediation on Marinwood Plaza Property – Former Drycleaner & Eastern Hot Spot

Two locations on the Marinwood Plaza property have consistently shown elevated levels of the contaminant PCE –the location of the former drycleaner, and a location between the drycleaner and the freeway called the “Eastern Hot Spot.”

Some remediation on these sites has been done in the past, with test results over time showing significant improvement at the Eastern Hot Spot, but despite improvements this has not been sufficient to remove all contaminants. Finalizing underground remediation work will occur within the parameters of the final work plan for the site, which is due at the end of the year.

In the meantime, the CRWQCB has ordered more immediate action in addressing soil vapor contamination coming from the property, specifically in regard to assessing any potential impact on the nearby residential neighborhood to the west, Casa Marinwood.

[The CRWQCB’s March 20, 2015 letter](#) requires a work plan and report to assess the extent of impacted soil vapor towards Casa Marinwood. Geologica has recently submitted the results of these tests. While the CRWQCB has not yet filed their response, [you can read the Geologica report yourself here](#) including maps of where samples were taken.

The only testing of the groundwater between the drycleaners and Casa Marinwood has shown no contaminants of concern.

However soil vapor tests from 2008 through present day show that PCE has been found above the Residential ESL in approximately 25% of samplings on the Marinwood Plaza property over the years. While the majority of soil vapor samples taken have not shown elevated levels of PCE, samples taken within close proximity to the former drycleaner and Eastern Hot Spot have consistently tested above ESLs for PCE.

Historically, there have also been two samplings (out of multiple samplings) showing levels of PCE above the Residential ESL along the western edge of the Plaza parking lot, towards Casa Marinwood. The first was in 2009 in the northern portion of the property, and the second was in the most recent reports filed by Geologica in June 2015 on the southern end of the parking lot.



## Where We Stand Today

### Remediation on Plaza Property – Former Drycleaner & Eastern Hot Spot *(Cont.)*

**The most recent testing** shows that of 6 soil vapor grabs along the western edge of the Marinwood Plaza property in May of 2015, 4 samples showed some presence of PCE. One sample, taken from the western edge of the parking lot just south of the former drycleaners, showed levels above the Residential ESL at 580 micrograms per cubic meter. (Residential ESL set a limit at 210 micrograms per cubic meter, while Commercial ESL set a limit of 2,100 micrograms per cubic meter.) [Read the Geologica report with these test results here.](#)

Based on this finding, Geologica will conduct further testing to fully define the extent of soil vapor contamination to the southwest of the property. They propose testing on the west side of Marinwood Ave, directly along the border of the Casa Marinwood neighborhood. Proposed testing locations are included in the Geologica report that included these results.

### Offsite Groundwater Investigation — Silveira Ranch

Initially it was unclear whether groundwater contamination had spread across the freeway to the Silveira property, and if so to what extent. The February 2014 work order stated that the “Executive Officer will require an offsite interim remedial action work plan if contaminants in offsite groundwater pose a potential threat to, or impact, an offsite domestic or agricultural well.”

In February of 2015, an investigative report found that 5 of 36 groundwater samples on Silveira Ranch exceeded the ESL for PCE. [Read a summary of these results here.](#) Further sampling in May 2015 found PCE at twice the levels of drinking water standards approximately 100 feet to the north of an active supply well on Silveira Ranch. [Read a summary of these results here.](#)

The CRWQCB determined that these results constitute a potential threat as referenced above.

As a result, on June 2, 2015 the CRWQCB ordered that an offsite remedial action work plan be prepared, which was submitted on July 9, 2015, [and you can read it here.](#) This work plan focuses on the supply well referenced above, and provides two potential courses of action that will be reviewed by the CRWQCB and the Silveira property owners.

Baseline readings from the water produced by the well taken on July 1, 2015 showed PCE levels at .58 ug/L, well below the ESL of 5ug/L. Regardless, a groundwater plume containing PCE at elevated concentrations has been identified approximately 100 feet to the north. According to the Geologica work plan, “Groundwater VOC [volatile organic compounds] plumes can shift or migrate in response to unpredictable environmental factors such as drought, changes in creek flow, or changes in groundwater use at the ranch.”



## Where We Stand Today

### Offsite Groundwater Investigation — Silveira Ranch (Cont.)

The two options proposed in the work plan are: 1.) treating water from the existing well, or 2.) replacing the well completely. Treating the exiting water would mean installing a carbon filtration/treatment system at the well head. Installation would take two to four weeks and is anticipated to have little potential impact on ranch operations. Drilling a new well would involve new infrastructure for moving water and power, and would take two to four months. Geologica reports that option 1 would be sufficient to treat water coming from the well based on its usage.

[The entire Offsite Interim Remedial Action Plan, as submitted by Geologica on July 9, 2015, can be found here.](#)

## What Does This Mean for the Casa Marinwood Neighborhood?

It has long been documented that contamination has been concentrated underneath the former drycleaners and directly to the east of the drycleaners at the Eastern Hot Spot. It has also become evident that groundwater contamination has occurred to the east, spreading under the freeway to Silveira Ranch.

The Casa Marinwood neighborhood is “upgradient” from the Marinwood Plaza property in terms of groundwater. That is why contamination has flowed to the east, and why no groundwater contamination has ever been detected to the west of the source of contamination.

As for soil vapor, testing done along Marinwood Ave in 2009 showed no contaminants of concern in 6 of 7 samples, with one sample showing PCE slightly above the Residential ESL at the western edge of the parking lot to the north, about 80 feet from residences in Casa Marinwood. Recent testing from May 2015 shows levels of PCE above residential ESLs in soil vapors from one testing location towards the other end of the parking lot, also along the western edge.

In order to fully understand the extent of this contamination, further testing will be done along the western edge of Marinwood Ave., directly in front of the Casa Marinwood neighborhood.

It is likely that this problem will not be solved until contaminated soil is fully treated. As previously stated, this process usually comes with redevelopment. Because redevelopment has been delayed over time, the CRWQCB has mandated that Marinwood LLC submit a plan to complete this work in a timely manner regardless of plans for redevelopment. That plan is due by the end of the year.

# MARINWOOD PLAZA UPDATE



## What to Expect in the Future

By the end of 2015 the owner is required to submit a “Final Action Plan” to the CRWQCB that maps out a plan from that point in time through the completion of remediation of the sources of contamination. Usually timelines for these processes are tied to the timing of development, but in this case the CRWQCB established a stand-alone timeline to ensure timely action by the property owners. Once this report is deemed acceptable by the CRWQCB, it will be put into action.

The CRWQCB will ultimately be responsible for ensuring compliance with state regulations for the cleanup process.

As previously stated, we are carefully tracking this process and will continue to do so. The final work plan submitted by January 1, 2016 must fully address remediation of the source of contamination.

## Be Sure to Sign Up for Future Updates Regarding Marinwood Plaza!

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Future information will be sent out through this dedicated channel, and we are relying on active engagement from the Marinwood Community for a successful public process. For immediate concerns or questions in regard to Marinwood Plaza, please contact **Chris Callaway**, Aide to Supervisor Connolly, who is staffed to this project via email at [ccallaway@marincounty.org](mailto:ccallaway@marincounty.org) or at **(415) 473-7354**.