BSK & Associates
1181 Quarry Lane
Building 300
Pleasanton, CA 94566
(510) 462-4000
(510) 462-6283 FAX

March 14, 1994

BSK Job No. P92057.3

R.T. Nahas Company/Eden Managements
20630 Patio Drive
Castro Valley, CA 94546

Attention: Mr. Randy Nahas

Subject: Service Station as Perc Source
Tien Unocal
20405 Redwood Road
Castro Valley, California

Gentlemen:

As requested, BSK & Associates has prepared this technical response addressing the potential for the Unocal Service Station located at 20405 Redwood Road in Castro Valley (Site) as a source of solvent contamination observed on the Safeway property at 20629 Redwood Road.

BSK does not consider the Site to be a potential source for the solvents observed on the Safeway property for the following reasons:

1a. **Solvent Use at the Station**

As reported by Frank Tien (Station operator), solvent use at the Site was comprised of one ten-gallon Safety Kleen solvent sink serviced by Safety Kleen. The tank is used for cleaning small automobile parts. The solvent used by Safety Kleen in this model of sink (17.4 C) is No. 105 solvent. No. 105 solvent is composed of 89% mineral spirits, with one percent (approximately 1.3 ounces) or less of the combined chlorinated compounds trichloroethene (TCE) and Perchloroethene (PCE). The sink is located in the northeast corner of the Station garage. The garage floor drain is located near the west wall of the garage. Bulk spillage of solvent would have to cross approximately 15 feet of concrete floor to the drain. The floor drain is reported by Mr. Tien to drain northward out of the garage to an east-west drain servicing the car wash adjoining the Site to the west. The approximate locations of the solvent sink, floor drain, floor drain lateral, east-west drain, underground storage tanks (UST), monitoring wells and selected borings are indicated on the enclosed Site Plan, Figure 1, and Site Area Map, Figure 2.

Given the quantity of solvent used at the station and its responsible handling, the percentage of chlorinated compounds in the solvent, the potential for interception and clean-up of a solvent spill travelling across the floor, and drainage of potentially released solvent to the north, the potential for significant release of solvent to the subsurface is low.

1b. **Aquifer Flushing**

If solvent release occurred at the Station in the garage area and contaminated groundwater there to 3700 ppb Perc (the lowest concentration of Perc detected in Well MW-7), the time it would take to naturally flush the Perc out of Station area with groundwater to levels detected in Station wells (<1.0 ppb-once) was modelled using the Zheng and Bennet method (1991), which was based on the EPA Batch Flush model; a similar method has been employed at Lawrence Livermore National Laboratory (Rogers 1992).

Based upon this model it is highly unlikely for the Perc detected in MW-7 to have been released from the station, since the station has only beem in existence since 1963, or approximately 30 years.

The model was calibrated to known conditions at the Site regarding aquifer characteristics, Perc concentrations in groundwater, minimum travel distance (from the rear of the dry cleaner to a short distance beyond MW-7) and time since release to travel that distance. Based on the Site conditions, the following times since release would be necessary for natural flushing of Perc from the Station subsurface:

Travel Time	Time to Flush to 1.0 ppb
50 years	316 years
40 years	262 years
30 years	196 years
20 years	132 years
10 years	66 years

As indicated, a greater number of years would be required to flush the aquifer of the least amount of Perc detected by BSK at Well MW-7 than the time the Station has existed. Periods of less than 10 years travel time would result in unrealistic estimates of aquifer conductivity for the site conditions.

2. **Chlorinated Compounds Other Than Perc**

Chlorinated compounds cis 1,2-Dichloroethene, trans 1,2-Dichloroethene, and Trichloroethene have been detected in the Site area at Well MW-7 and Sample Point SP-1. These compounds have been shown to be abiotic degradation products of Perc (Davis and Olsen (1990), McCarty (1988 and 1991), and Sims (1991) in groundwater. Abiotic or biotic transformation of the compounds listed have not been shown to form Perc. Since Perc has been the compound of greatest concentration detected in the Site area (MW-7 and SP-1) by BSK, Perc is considered the primary contaminant.

3. **Preferential Flow Between Wells MW-5 and MW-6**

Although Well MW-6 is near the dry cleaner, the well has had low detections by BSK of chlorinated compounds. This may be explained by the release location, preferential groundwater flow through the area and sediment distribution. The release location is unknown
to BSK but is suspected to be within or near the dry cleaner. Evidence for preferential flow of groundwater through the dry cleaner due to sediment distribution is supported by Site area boring data. As characterized by BSK in borings MW-7, SP-1, MW-5, MW-6, SB-14 and SB-15, a south-southwest trending channel of clayey sand and silty sand is located between the UST of the service station and Well MW-7. In wells MW-5 and MW-6 this horizon is comprised of silty clay. Shallow soil borings performed by BSK north of the dry cleaner in March 1991 support this interpretation. The 1991 boring data supporting a channel in this area is depicted in Figure 17 of BSK report P90165 of April 29, 1991. In addition to preferential groundwater flow through the channel, chlorinated compound migration in the pure, aqueous and gaseous phases would be restricted laterally by the silty clay.

4. **Chlorinated Compounds Within the Site**

The compound 1,2-Dichloroethane (DCA) has been detected in groundwater at Site locations SP-1 and MW-2 in association with gasoline. DCA has not been detected by BSK in Well MW-7 where much higher concentrations of contamination have been detected; therefore it is apparent that DCA contamination may be associated with gasoline release and not Perc release.

Trace concentrations of PCE and TCE were detected at Well MW-4 in groundwater in October 1993. The concentrations slightly exceeded the detection limit of 0.5 ppb.

Chlorinated compounds 1,2-Dichloroethane, cis 1,2-Dichloroethene, trans 1,2-Dichloroethene, and Trichloroethene and Perc were detected in groundwater in Sample Point SP-1 approximately 20-feet north of the center of the rear of the dry cleaner (BSK Report P93306.3 of December 9, 1993). The greatest concentration was 28 ppb. Migration of these compounds northward from the dry cleaner against the groundwater gradient can occur in the soil above groundwater, along sewer lines if occurring (Izzo, 1992), and by molecular diffusion. Migration of these compounds has been found to be independent of groundwater flow as high as 14 meters per day (Schwille, 1988) and more responsive to gravity. Therefore, the spatial arrangement of porous and less porous sediments can cause migration in any downward direction.

BSK hopes that the preceding information is sufficient to meet the needs of the ACDEH. If there are questions regarding this submittal, please contact us.

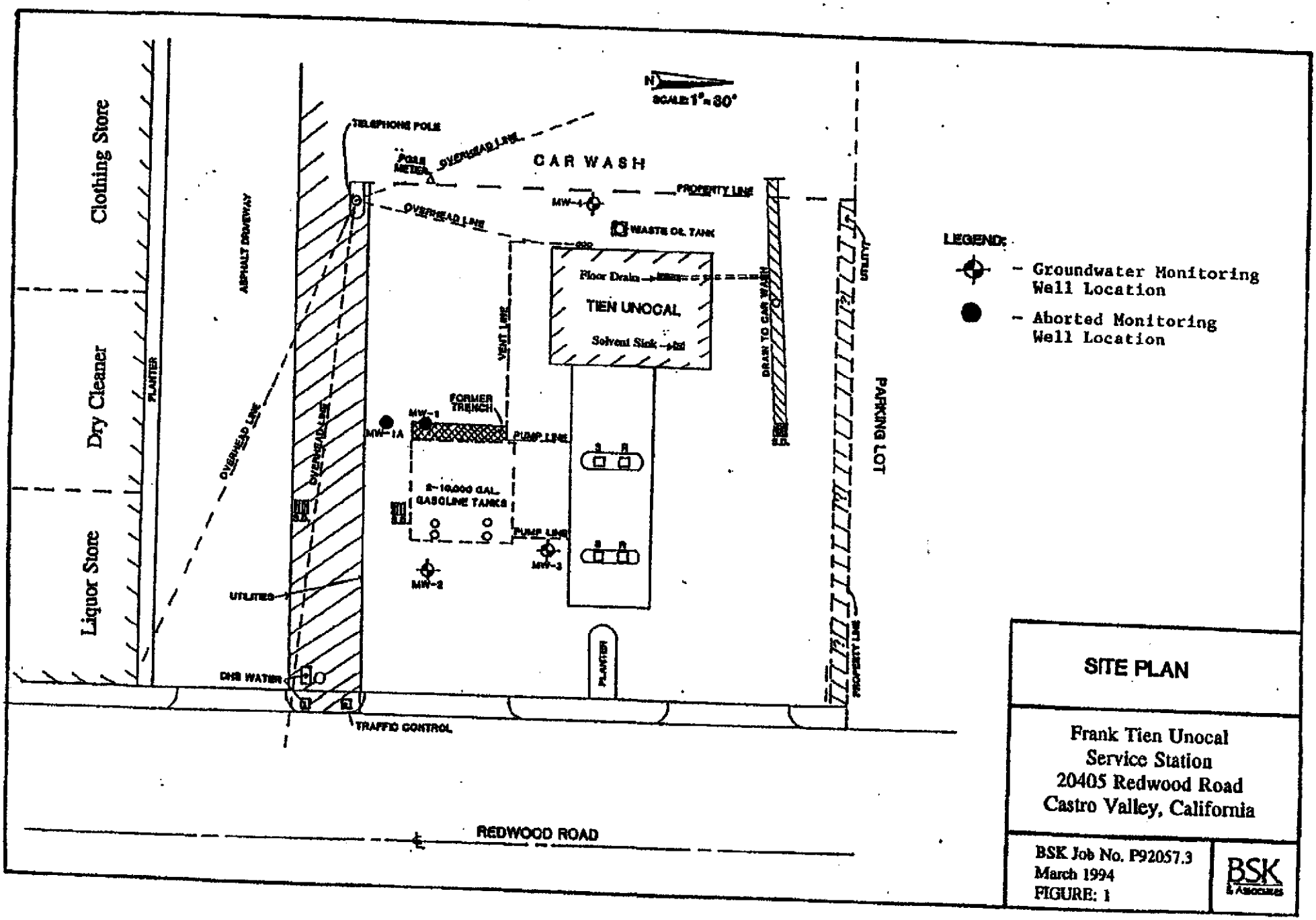
Respectfully submitted,
BSK & Associates

Tim W. Berger, C.E.G. No. 1828
Project Geologist

AYE/TWB:ndp
(REP\ENVVNAHASLT.394)

Attachments:
Site Plan
Site Area Map

BSK & Associates

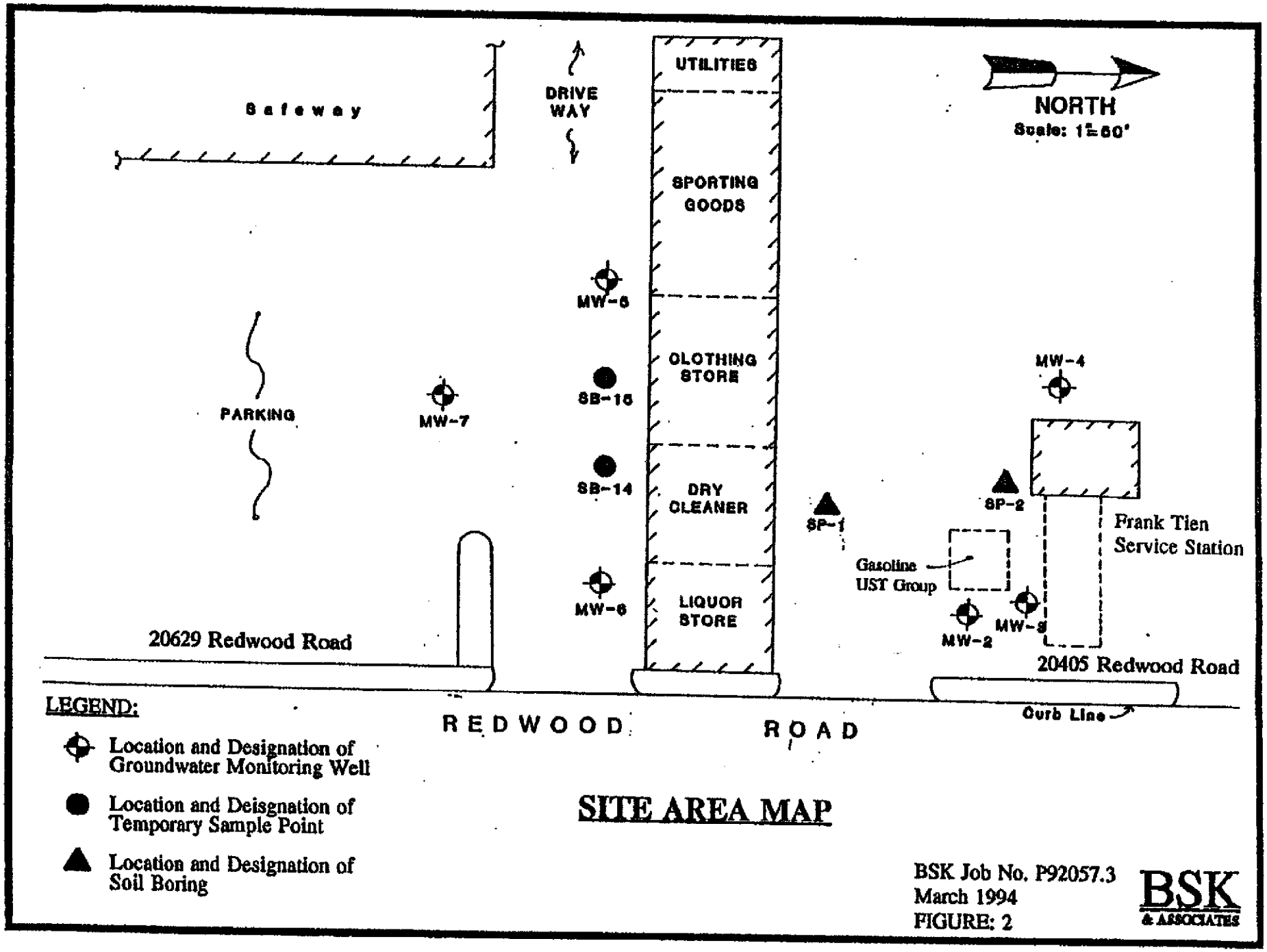


SITE PLAN

Frank Tien Unocal
Service Station
20405 Redwood Road
Castro Valley, California

BSK Job No. P92057.3
March 1994
FIGURE: 1

BSK & Associates



SITE AREA MAP

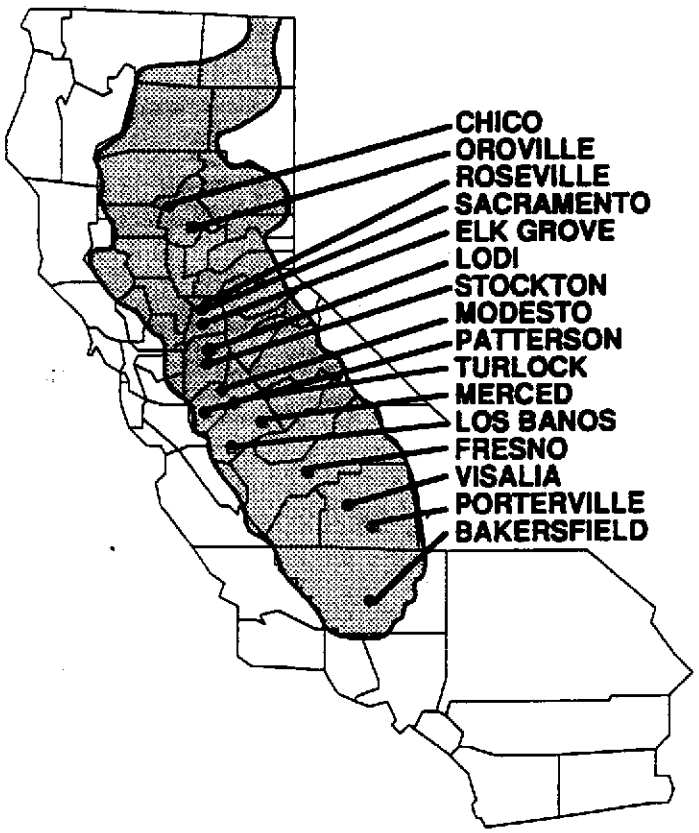
BSK Job No. P92057.3
March 1994
FIGURE: 2

BSK & ASSOCIATES

DRY CLEANERS— A MAJOR SOURCE OF PCE IN GROUND WATER

27 March 1992

CENTRAL VALLEY
CITIES WHERE MUNICIPAL WELLS ARE AFFECTED BY
TETRACHLOROETHYLENE (PCE)



WELL INVESTIGATION PROGRAM

REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

John S. Corkins, Chair
Karl E. Longley, Vice Chair
Hank Abraham, Member
A. Vernon Conrad, Member
Hugh V. Johns, Member
W. Steve Tompkins, Member
Clifford C. Wisdom, Member

William H. Crooks, Executive Officer

3443 Routier Road, Suite A
Sacramento, California 95827-3098

Phone: (916) 361-5600
CALNET: 8-495-5600

DRY CLEANERS—A MAJOR SOURCE OF PCE IN GROUND WATER

VICTOR J. IZZO
Associate Engineering Geologist

Approved by the California Regional Water Quality Control Board, Central Valley Region on 27 March 1992

INDEX

EXECUTIVE SUMMARY

Tetrachloroethylene (PCE), a known carcinogen, has degraded at least 215 wells in the Central Valley of California. Figure 1 illustrates the extent of the problem. The majority of these wells are large system municipal wells of 200 connections of more. The Chico, Sacramento, Modesto, Fresno, Turlock, Lodi and Merced areas all have wells with levels of PCE above 0.8 ppb which is the estimated one in a million incremental cancer risk (8). The Maximum Contaminant Level (MCL) set by the Department of Health Services for drinking water is five ppb. Forty-seven of the 215 wells have PCE levels above the MCL.

The Well Investigation Program of the Central Valley Regional Water Quality Control Board so far has identified the likely PCE sources in 21 of the wells; in 20 of those wells, dry cleaners are the likely source. In areas where PCE well investigations were done, dry cleaners are the only present large quantity users of this volatile organic chemical (VOC). The Halogenated Solvent Industry Alliance 1987 white paper on PCE states that dry cleaners use 56% of the PCE used in United States (5). All dry cleaners in the vicinity of degraded supply wells show evidence of major ground water degradation. Monitoring wells drilled adjacent to dry cleaners had concentration from 120 ppb to 32,000 ppb, well above the MCL.

The main discharge point for dry cleaners is the sewer line. The discharge from most dry cleaning units contains primarily water with dissolved PCE, but also contains some pure cleaning solvent and solids containing PCE. Being heavier than water, PCE settles to the bottom of the sewer line and exfiltrates through it. This liquid can leak through joints and cracks in the line. PCE, being volatile, also turns into gas and penetrates the sewer wall. Sewer lines are not designed to contain gas. The PCE then travels through the vadose zone to the ground water.

Where a source investigation has been done in connection with PCE contamination, the evidence has shown that dry cleaners have degraded the ground water. The data strongly indicate that leakage through

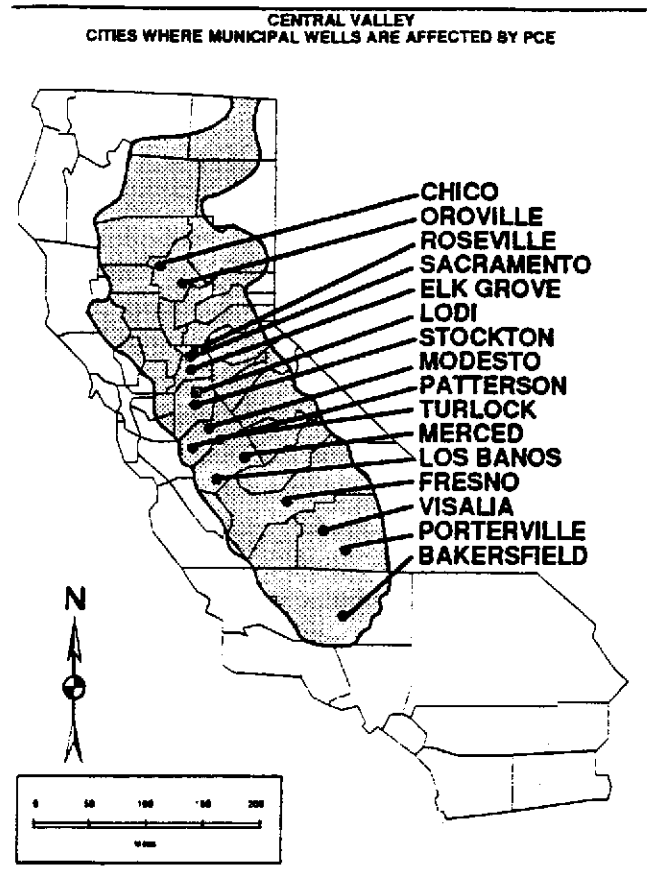


Figure 1

the sewer lines is the major avenue through which PCE is introduced to the subsurface. With approximately 285 dry cleaners in just the metropolitan areas of Sacramento, Chico, Lodi, Modesto, Turlock, Stockton and Merced, one would expect that many more wells will be degraded by PCE in the future. Most of the wells degraded by PCE and most of the dry cleaners are in residential and retail areas. Based on the data collected to date and the location of most of the degraded wells with confirmed PCE, a great majority of these wells will have dry cleaners as the source.

The solution to part of the problem is to halt the disposal of waste from dry cleaning units to the sewer line. Regulation of this discharge to the sewer could be achieved through new legislation and city ordinance. Since this problem exists throughout the state, a statewide policy seems appropriate.

The other part of the problem is ground water cleanup

which is required so that cities can continue to provide safe water. A state wide fund may be needed to help pay for cleanup.

INTRODUCTION

Over 750 wells have been reported to the California Regional Water Quality Control Board, Central Valley Region, with confirmed levels of volatile organic chemicals (VOCs). Greater than 35% of the reported wells contain tetrachloroethylene (PCE). Municipal drinking water supplies have been affected by PCE throughout the Central Valley (Figure 1). At least one city is already treating contaminated ground water in order to continue its water supply.

This report discusses some of the data and conclusions about PCE movement to ground water, the source of the PCE, and possible solutions. The report is divided into six sections.

*Introduction

* Tetrachloroethylene (PCE)
  A brief description of the use of PCE and its physical and chemical properties.

* Source Identification for PCE Degraded Wells
  A description of how Board staff determines the source of VOC(s) in a well and the results of PCE source investigations.

* Dry Cleaning Operations and Discharge Locations
  General discussion of dry cleaning operations and waste discharge points.

* Evidence and Theory on How PCE is Leaving the Sewer

* Conclusion and Recommendations

TETRACHLOROETHYLENE (PCE)

PCE was first formulated in 1821 (22). By the 1960's and early 1970's, it had become a widely used solvent in dry cleaning, metal degreasing and other industries (18). In the late 1970's, most industries moved away from the use of PCE. The exception was the dry cleaning industry. By the early 1980's, dry cleaners used the majority of the PCE in this nation (18). In the late 1980's, dry cleaners used 56% of the PCE used in United States (5).

Compared to many VOCs, PCE is very mobile, with relatively low solubility and vapor pressure. In its liquid state, it is heavier and less viscous than water and will sink through it. In the vapor phase, PCE's density is greater than air. PCE biodegradability is low in the subsurface. The following are some of the physical and chemical properties of PCE: [3]

Molecular Weight	165.85 g
Solubility	150 mg/l at 25°C
Vapor Pressure	14 torr
Density	1.63 g/cm
Boiling Point	121 °C
Kinematic Viscosity	0.54 (water=l)
Henry's Law Constant	0.0131 atm-m /mole
Vapor Density	5.83 (air=1)
Specific Gravity	1.63 at 20° (water=l)
Relative Velocity	1.8 (water=l)

PCE is generally found in three phases in the subsurface: liquid, vapor, and dissolved in water. More than one phase usually exists in the subsurface after discharge. Figure 2 shows three possible scenarios at a discharge point.

VOCs will not adsorb to subsurface materials to any significant degree when those materials are nearly pure minerals which contain little organic matter. Most high-yield aquifers are nearly free of organic matter. The majority of fresh water aquifers and the vadose zone in the Central Valley are fan deposits from the Sierra Nevada and the Coast Range, and are composed primarily of low organic soils and substrata. Therefore, retention of VOCs in the Central Valley by soil and subsurface strata probably is very low.

PCE is a known carcinogen. The Water Quality Advisories for a 1-in-a-million incremental cancer risk

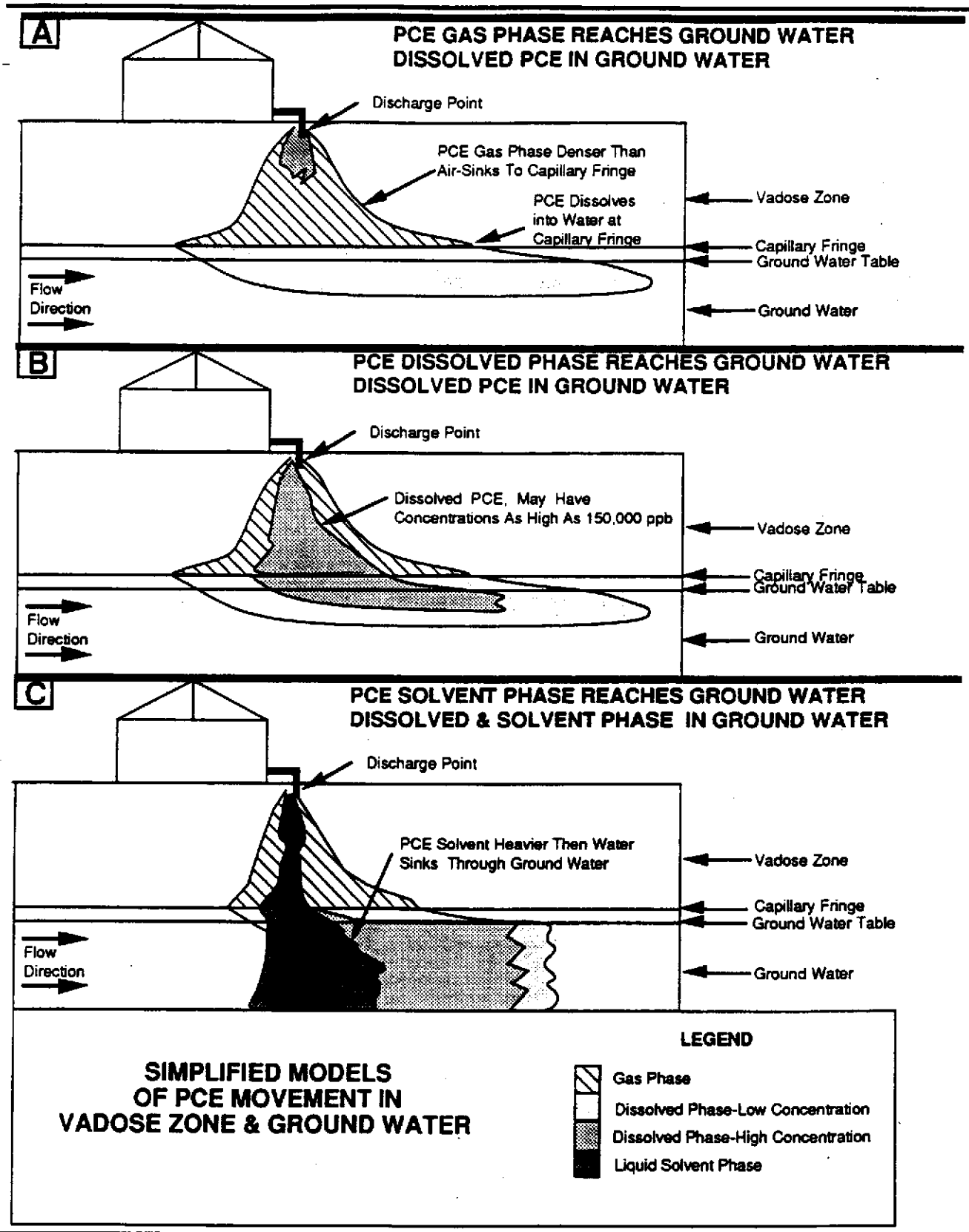

A
PCE GAS PHASE REACHES GROUND WATER
DISSOLVED PCE IN GROUND WATER
Discharge Point
PCE Gas Phase Denser Than Air-Sinks To Capillary Fringe
PCE Dissolves into Water at Capillary Fringe
Vadose Zone
Capillary Fringe
Ground Water Table
Flow Direction
Ground Water
B
PCE DISSOLVED PHASE REACHES GROUND WATER
DISSOLVED PCE IN GROUND WATER
Discharge Point
Dissolved PCE, May Have Concentrations As High As 150,000 ppb
Vadose Zone
Capillary Fringe
Ground Water Table
Flow Direction
Ground Water
C
PCE SOLVENT PHASE REACHES GROUND WATER
DISSOLVED & SOLVENT PHASE IN GROUND WATER
Discharge Point
PCE Solvent Heavier Then Water Sinks Through Ground Water
Vadose Zone
Capillary Fringe
Ground Water Table
Flow Direction
Ground Water
SIMPLIFIED MODELS OF PCE MOVEMENT IN VADOSE ZONE & GROUND WATER
LEGEND
Gas Phase
Dissolved Phase-Low Concentration
Dissolved Phase-High Concentration
Liquid Solvent Phase

Figure 2

estimate is 0.8 ppb (8). The State of California Department of Health Services Maximum Contaminant Level (MCL) for PCE is five ppb.

SOURCE IDENTIFICATION FOR PCE DEGRADED WELLS

A source investigation is conducted by Board staff to identify the source(s) of contaminant found in a drinking water supply well. This section is divided into two parts: a description of the steps in a source investigation and a general discussion of the results of a PCE source investigation.

SOURCE INVESTIGATION

There are five general steps conducted in a source investigation as follows:

1. Well reported degraded by VOCs
2. Identify possible sources of the VOCs
3. Inspect the users of the VOCs
4. Identify ground water characteristics
5. Conduct a soil gas survey

In step 1, a drinking water well is reported degraded by a VOC to the Board. The main sources of this information are the California Department of Health Services, counties, municipalities and private water companies. The information starts the Board's formal source investigation.

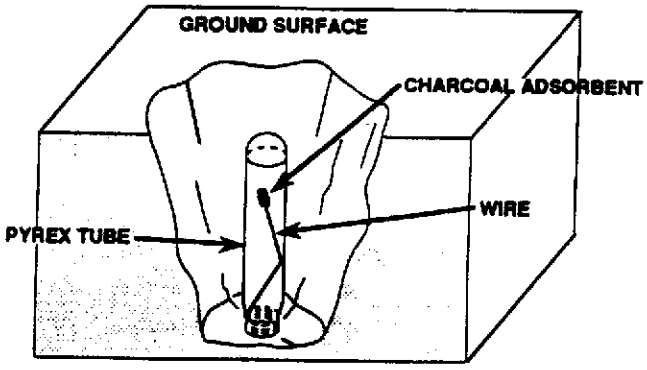
In step 2, staff attempts to identify all possible uses of the VOC(s) of concern. For example, is it used as solvent or refrigerant? Then they identify the type of businesses that would use the VOC(s). At this point staff does research using business directories, phone books, and county and city records to identify those facilities (potential sources) in the past and present that might use or have used the VOC(s) found in the well. This search for potential sources is done for an area approximately 1/2 mile in radius around the well. Some record searches for have gone as far back as the 1930's.

In step 3, inspecting possible sources, a questionnaire is first mailed to potential sources asking the facility operators about their uses of VOCs. This is the initial screening and reduces the quantity of field inspections. For example, if a facility is listed as a dry cleaner in the phone book and the questionnaire response says it is only a transfer station and no solvents are used, then the site would be removed from the potential source list and not inspected.

Staff inspects the facilities that use VOCs and determines if the potential source should be investigated further. If an investigation continues on a facility, then staff samples all discharges leaving the facility (discharges to land, water and sewer).

In step 4, identifying ground water characteristics, staff collects information from government and private ground water studies. The data collected from these studies are correlated to give a general understanding of the stratigraphy and ground water characteristics. This is not site-specific and is done after identifying possible sources so there is not a bias to upgradient sources.

In step 5, the soil gas survey is used to identify areas of VOCs in the soil and ground water. A survey involves placing glass tubes, each containing a carbon coated wire, open end down, 10-12 inches below the soil surface (Figure 3). After placement, the tubes are covered with soil. The evaporating VOC gasses disperse through the soils and reach the survey



SOIL GAS TUBE

Figure 3

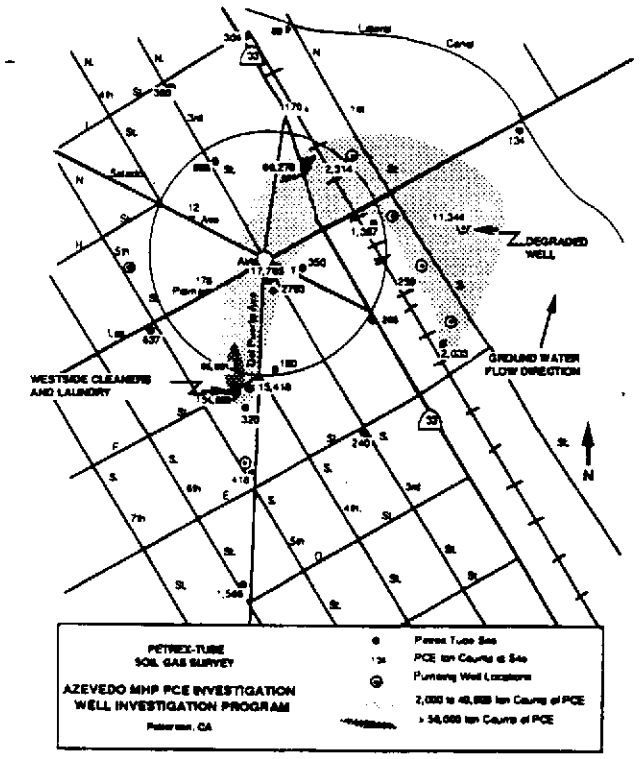


Figure 4

equipment. Approximately six week later, the tubes are removed and sent to the laboratory for VOC analysis. The results are in numbers of a specific VOC molecule retained by the carbon coated wire. The numbers are not concentrations, but are relative to each other. Locations with high counts have more of that VOC in the soil vapor than areas with low counts. Figure 4 is an example of the results of one of these surveys.

At this point the potential sources have been reduced to a few likely sources. It is at this time that site investigations are requested from the likely sources.

RESULTS OF PCE SOURCE INVESTIGATIONS

Staff source investigations have found that PCE is used in several industries (Figure 5) and is a component of several over-the-counter products such as brake and carburetor cleaners and spot removers. Staff surveys of industries other than dry cleaners which used these products show that PCE is not the main constituent in most of them. These products are usually less than 30% PCE, while dry cleaning solvent

IDENTIFIED SOLVENT USERS

- ***Auto/Boat Industry**
  - Service Stations
  - Auto Dealerships
  - Boat Dealerships
  - Truck Repairs
  - Auto Maintenance Facilities
- ***Telephone Companies**
- **Elevator Service Companies**
- **Public Schools**
- **Mobile Home Parks**
- ***Dry Cleaners**
- **Laundries**
- **Print Shops**
  - Newspapers
  - *Copying and Printing Businesses
- **Machine Shops**
  - Electric Motor Repair
  - Sheet Metal & Welding
- **Lumber/Timber Industry**
- ***Over-the-Counter Products**
- **Furniture**
  - Strippers
  - Antique Shops
  - Upholstery Repair
- **Power Stations**
- **Paint Dealers**

* - Industries where at least one product has PCE

Figure 5

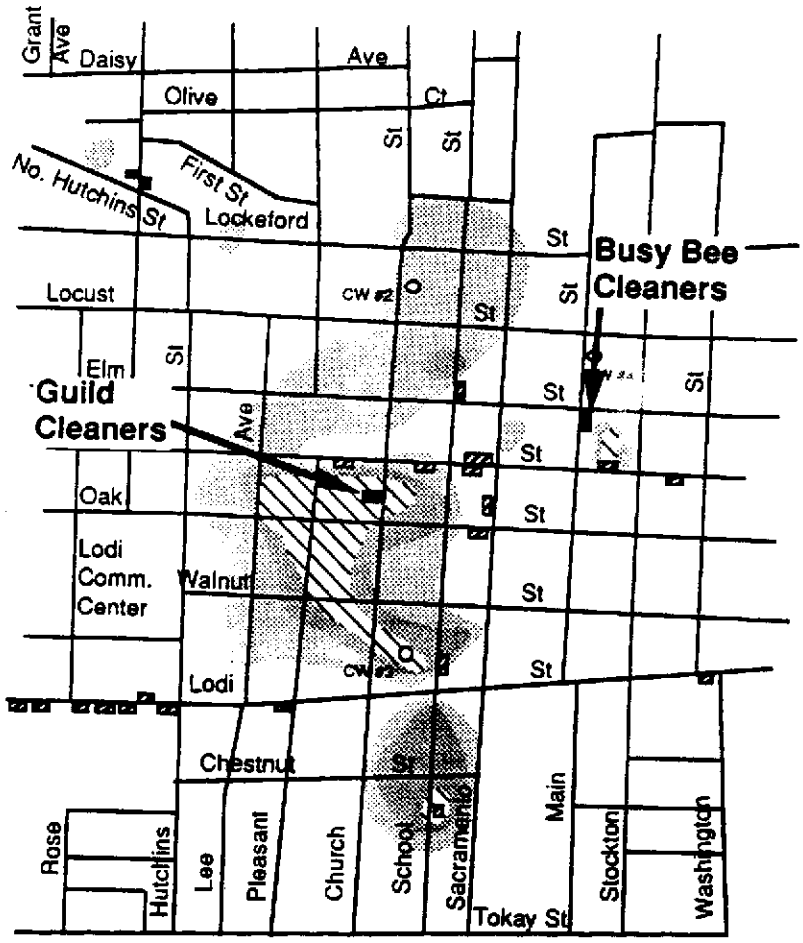
is 100% PCE. Dry cleaning uses a large quantity of PCE solvent compared to other potential sources. The typical cleaner uses between 15 and 40 gallons a month of pure PCE. Many of the other industries also collect the solvent after use for recycling and do not discharge waste liquids to the land or sewer. Also, many of the solvents used that contain PCE are in aerosol cans. The solvent is sprayed on the part to remove grease and as the part dries, the PCE volatilizes into the air. Most industries other than dry cleaners which use solvents have no daily discharge of waste liquids containing PCE.

The staff soil gas surveys, which include all solvent users, show dry cleaners as the source areas. Figures 6 and 7 are two examples. None of the soil gas surveys have shown PCE vapor plumes near other solvent users.

Based on questionnaires, inspections, handling practices and soil gas surveys, staff concludes that dry cleaning is a major source of PCE ground water degradation in the Central Valley.

LODI

SEWER LINES



EXPLANATION

N

- Currently operating dry cleaners
- Past dry cleaners
- < 10,000 PCE ion counts
- 100,000 - 200,000 PCE ion counts
- 10,000 - 100,000 PCE ion counts
- > 200,000 PCE ion counts

SCALE

0.0 0.1 0.2 0.3 0.4 0.5 Miles

Figure 6

CITY OF MERCED
WELLS 3 & 5
PCE
INVESTIGATION
SOIL GAS SURVEY - JANUARY 1991
CITY OF MERCED WELL
GROUND WATER INVESTIGATION
KNOWN DISCHARGE OF PCE TO SOILS, UNDER INVESTIGATION
PCE COUNTS
5,000 - 10,000
10,000 - 100,000
> 100,000
SCALE
0
1000
in feet
ONE HOUR MARTINIZING
Sunshine Cleaners
SIMPSON CLEANERS
MERCED LAUNDRY
CITY OF MERCED WELL 3
HIGHWAY 99

Figure 7

DRY CLEANERS OPERATION AND DISCHARGE LOCATIONS

There are two basic types of dry cleaning machines, transfer and dry-to-dry. Both have similar types of discharges with the dry-to-dry machine being more efficient. The only major difference is that the dry-to-dry unit does the washing and drying of the clothing in the same machine, while a transfer unit use separate machines. The following section is a general description of a facility containing a transfer unit.

Dry cleaning transfer systems include a dry cleaning wash unit, PCE storage tank (generally part of the wash unit), reclaimer (dryer), cooker and vapor condenser (Figure 8). Pure PCE solvent is added directly from the PCE tank to the wash unit. A small amount of water and soap is usually added to remove stains that PCE will not. Most facilities send the spent solvent (after washing cycle) through solid filter canisters to remove solids and then return it to the PCE tank in a closed system. The solvent in the PCE tank also is periodically purified by physical transfer to the cooker, which separates solvent from solids through distillation and forms a sludge at the bottom.

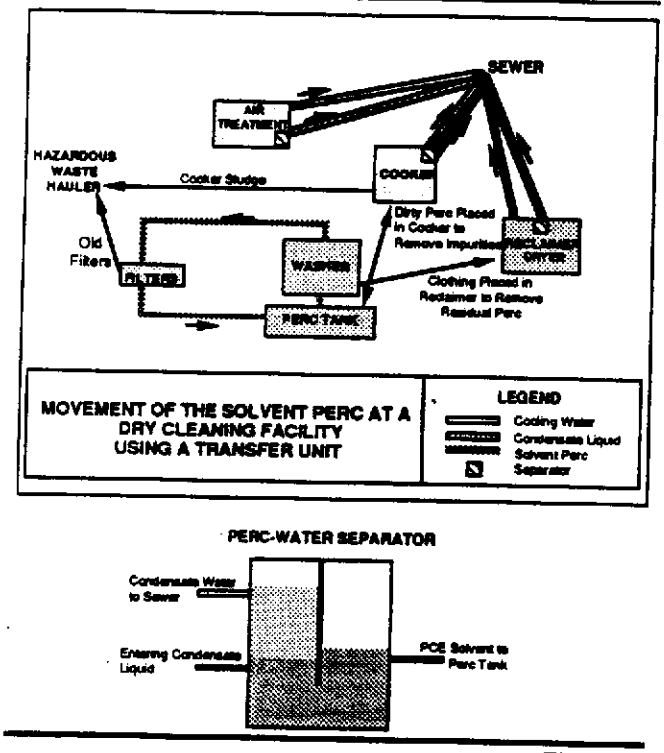


Figure 8

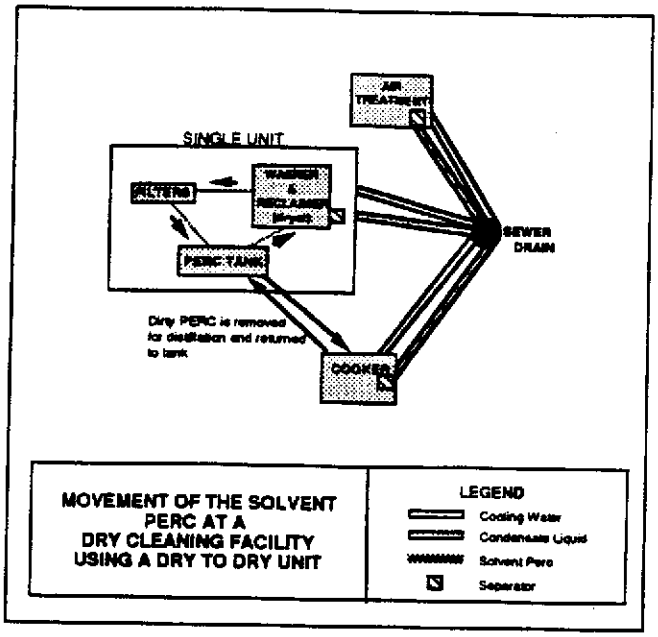
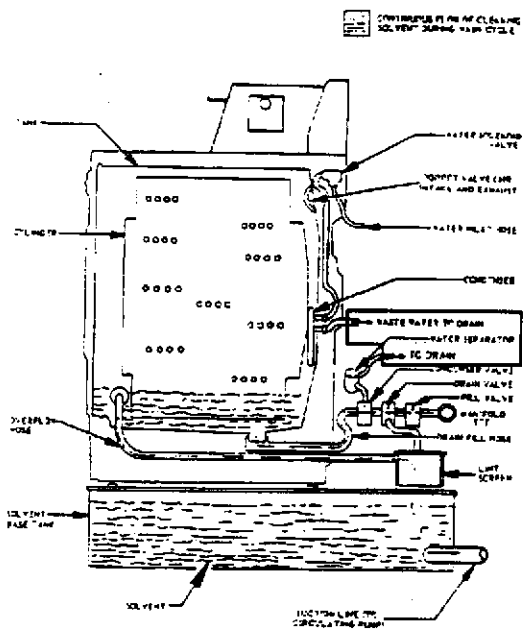


Figure 9

After washing, the clothing is removed from the wash unit and placed in the reclaimer to remove residual solvent. This drying process removes PCE solvent by heating the clothing which causes the solvent and any water to evaporate. The vaporized solvent and water is then removed from the drying portion of the machine and condensed. The PCE-water separator, which is connected to the back of the unit, takes the condensed liquid that contains PCE and water and allows the heavier PCE to settle to the bottom for reuse. The air scrubber (sniffer) extracts and cleans vapors from the other dry cleaning components and the air. These vapors also are condensed and the PCE and water separated.

In general, information provided by dry cleaner operators, inspections done by staff, and manufacturers' service manuals show that dry cleaning equipment is designed to discharge wastewater to the sewer. Figures 8 and 9 are schematics showing the two main types of wastewater discharges from dry cleaning equipment: liquid from the PCE-water separators and cooling water. Figure 10 is a schematic from one manufacturer's service manual that shows that wastewater should be discharged to the drain (11). This is typical of service manuals.



COIN-OP DRY TO DRY UNIT

Graphic From - Norge Sales Corporation, Service Instruction and Parts Catalog, 1961

Figure 10

The water from the PCE-water separators has been in direct contact with PCE. Water samples from separators at some cleaners have had such high concentrations of PCE that after the sample bottle sat for a day, solvent had separated out. As much as 30 percent of some samples has been pure solvent. PCE-water separator waste liquid has had PCE levels up to 1,119,300 ug/l (ppb), with an average of 151,800 ppb and median 64,000 ppb (Figure 11). Cooling water samples at dry cleaners have usually ranged from 3 to 70 ppb PCE, but some have been as high as 4,000 ppb (Figure 12).

EVIDENCE AND THEORY ON HOW PCE IS LEAVING THE SEWER LINES

Based on site inspections, the majority of the cleaners had only one discharge point and that was to the sewer. Because of these discharges, staff investigated sewer lines as a possible discharge point for PCE to the soils. Samples taken from these lines indicated that liquids or sludges with high concentrations of PCE are lying on the bottom of the sewer. Soil gas surveys

DRY CLEANERS SAMPLING RESULTS FROM CONDENSATE LIQUID

CLEANER	CITY	DATE	RESULT in ppb	UNIT
Busy Bee	Lodi	9/11/90	60,699	Reclaimer
Turlock Cleaners	Turlock	4/29/91	62,755	Cooker
Snow White	Turlock	1/26/89	140	Reclaimer
			56	Cooker
Durite Cleaners	Turlock	1/30/89	15,000	Sniffer & Reclaimer II
			150,000	Reclaimer I
Brite Cleaners	Turlock	5/11/89	66,000	Reclaimer
Southgate Norge	Sacramento	3/20/91	247,000	Sniffer & Reclaimer
Tillet Cleaners	Roseville	4/11/89	74,000	Reclaimer
Merced Laundry	Merced	11/29/88	130,000	Sniffer
Modesto Steam	Modesto	4/30/91	1,119,300	Reclaimer
			139,087	Cooker
			8,120	Chiller
			53,618	Recalimer
		Median	64,000	
		Average	151,800	

Figure 11

CONCENTRATION OF ORGANIC CHEMICALS IN COOLING WATER FROM DRY CLEANERS

DRY CLEANERS	CITY	DATE	RESULTS in ppb	
Busy Bee	Lodi	8/24/89	0.66	PCE
			2.1	TCE
			0.69	1,1-DCE
		8/28/90	1.2	PCE
			1	TCE
DuRite	Turlock	11/29/91	6.3	PCE
			4.7	PCE
			1.7	PCE
			5.3	PCE
Turlock	Turlock	5/21/90	0.8	PCE
			1.3	PCE
Bright	Turlock	5/11/89	2.7	PCE
Tillet	Roseville	11/30/88	67	PCE
			32	Chloroform
		2/10/89	1.1	PCE
			23	Chloroform
Deluxe	Roseville	2/26/89	0.8	PCE
			69	Chloroform
Elwood's	Modesto	4/30/91	14	PCE
Parkway	Merced	9/8/88	69	PCE
Simpson	Merced	9/8/88	38	PCE
Southgate Norge	Sacramento	1/12/89	28	PCE
Merced Laundry	Merced	11/29/89	4000	PCE

Figure 12

done by staff and by private consultants illustrate high PCE vapor concentrations along the sewer lines. Work done by the City of Merced shows that intact sewer lines can and have discharged PCE to the soil.

Below are descriptions of sampling done and our interpretation of the data. Following these descriptions is a section on the theories of how PCE escapes from the sewer pipes.

SOIL GAS SURVEYS

Soil gas surveys related to PCE in ground water have been done by Board staff in Sacramento, Lodi, Merced, Modesto, Stockton, Roseville and Turlock. Every place PCE molecules have exceeded 100,000 counts and monitoring wells have been installed, PCE levels in ground water exceeded the MCL. In most cases, the PCE concentration in ground water has exceeded 300 ppb, which is 60 times the MCL. Thus, this survey technique has been very successful.

Figures 13 through 16 are maps showing results of soil gas surveys from Turlock, Modesto, Lodi and Merced which illustrate that PCE vapors are higher along the sewer lines. The highest counts are usually near the cleaners, but the counts continue high from the sites down the sewer line.

Around several dry cleaners near Stockton, a private consultant performed a soil vapor survey for PCE. The consultant extracted a volume of air from the soils

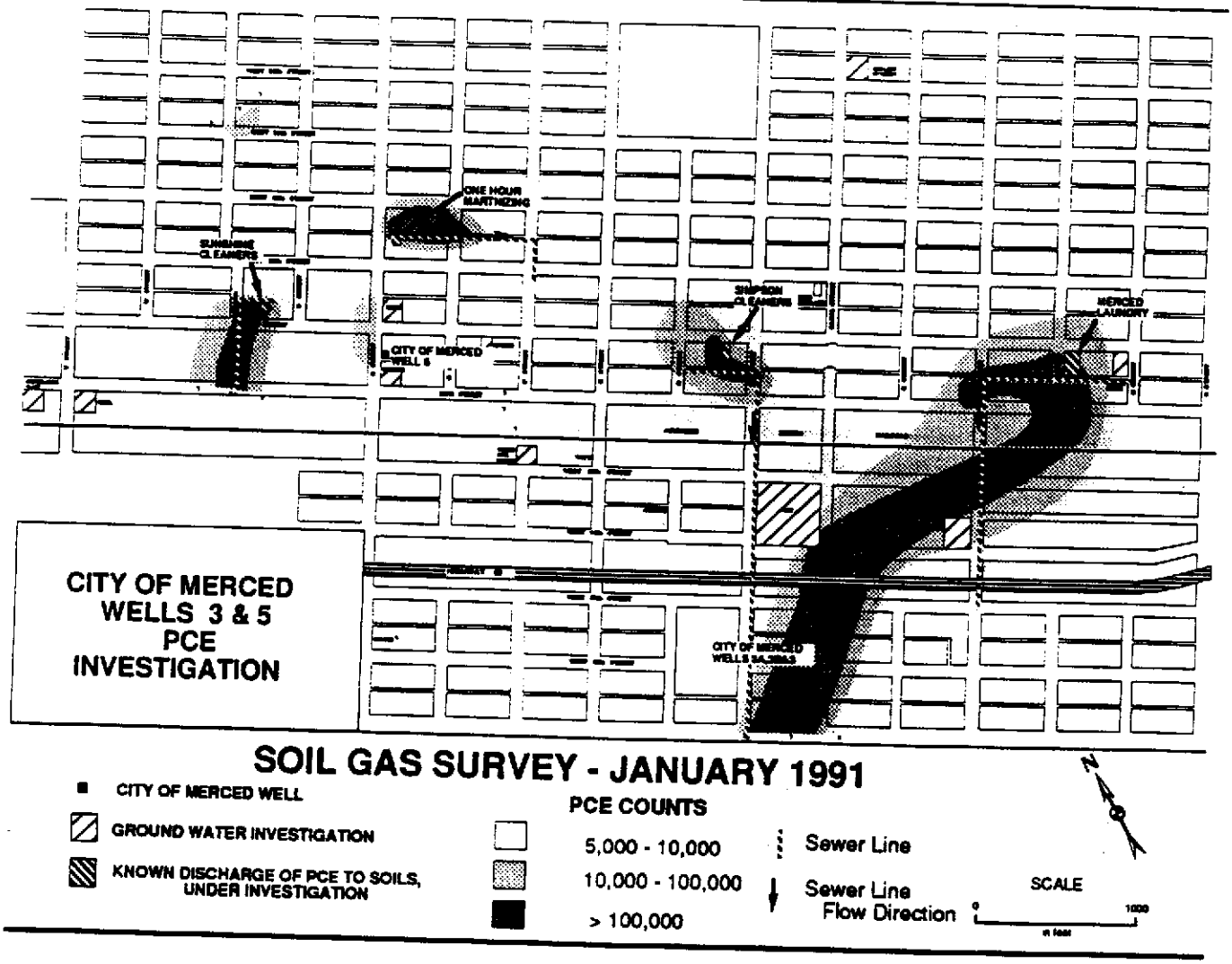
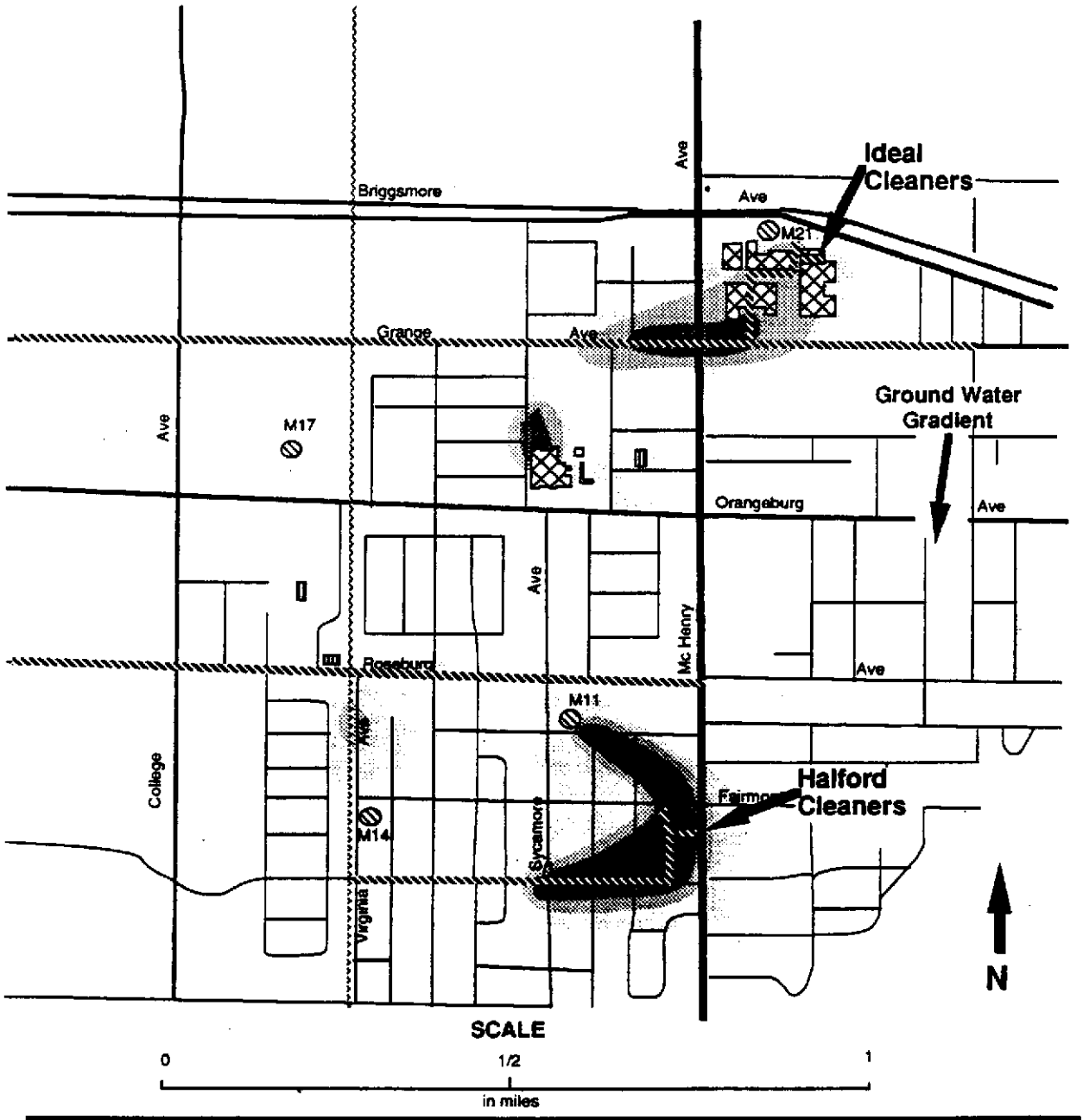


FIGURE 13



CITY OF MODESTO
WELL 11, 14 & 21
SOIL GAS SURVEY
AND
SEWER LINE LOCATIONS

PCE ION COUNTS
(in thousands)

- 10 - 50
- 50 - 150
- >150

- Municipal Well
- Active Dry Cleaner
- Inactive Dry Cleaner
- Other Buildings
- Sewer Lines

Figure 14

LODI

SEWER LINES

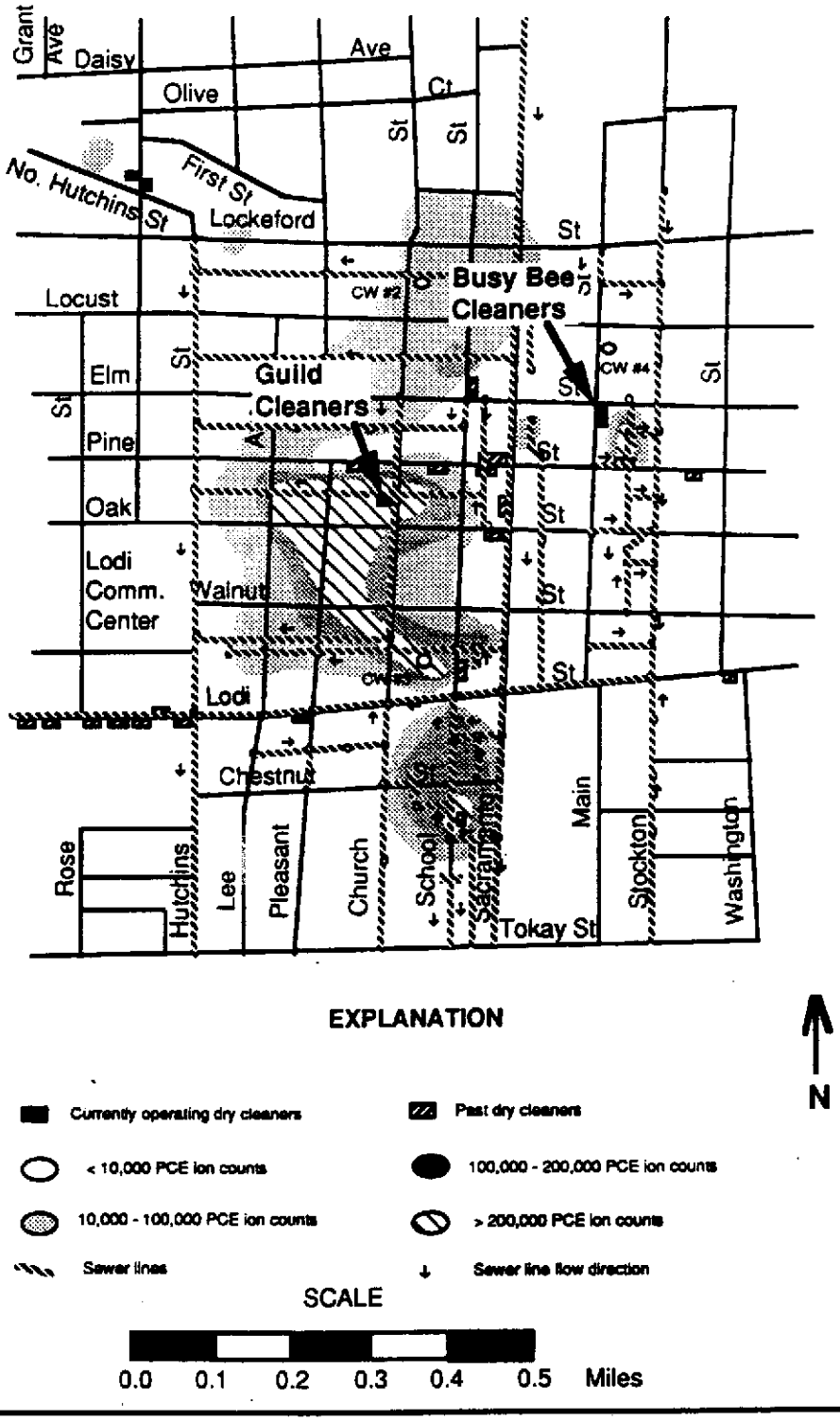
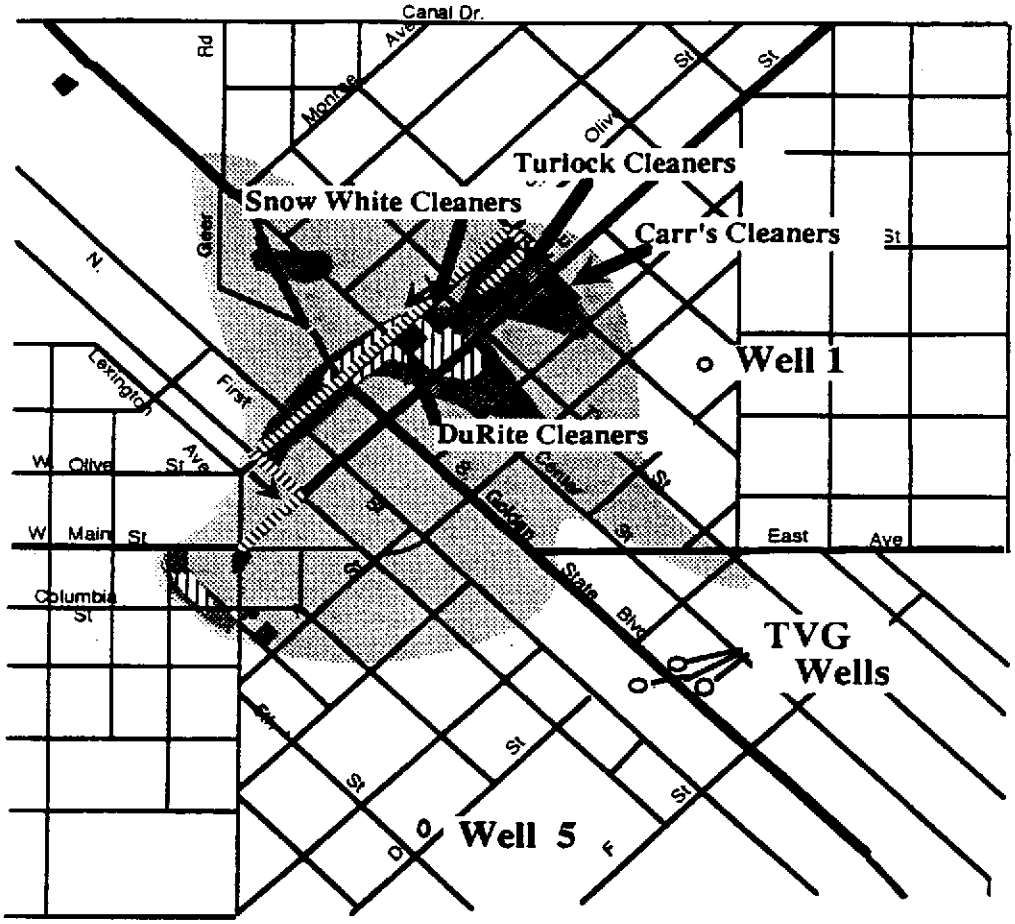


Figure 15

TURLOCK SOIL GAS SURVEY



◆ ACTIVE DRY CLEANER

▪ INACTIVE DRY CLEANER

o WELL

SEWER LINE

10,000-100,000 PCE ION COUNT

100,000-200,000 PCE ION COUNT

>200,000 PCE ION COUNT

0 SCALE 1/2

MILES

N

Figure 16

and ran the sample through a gas chromatograph. This survey also indicates high concentrations of PCE vapor along the sewer line (Figure 17). There are similar surveys done by other private consultants with the same results.

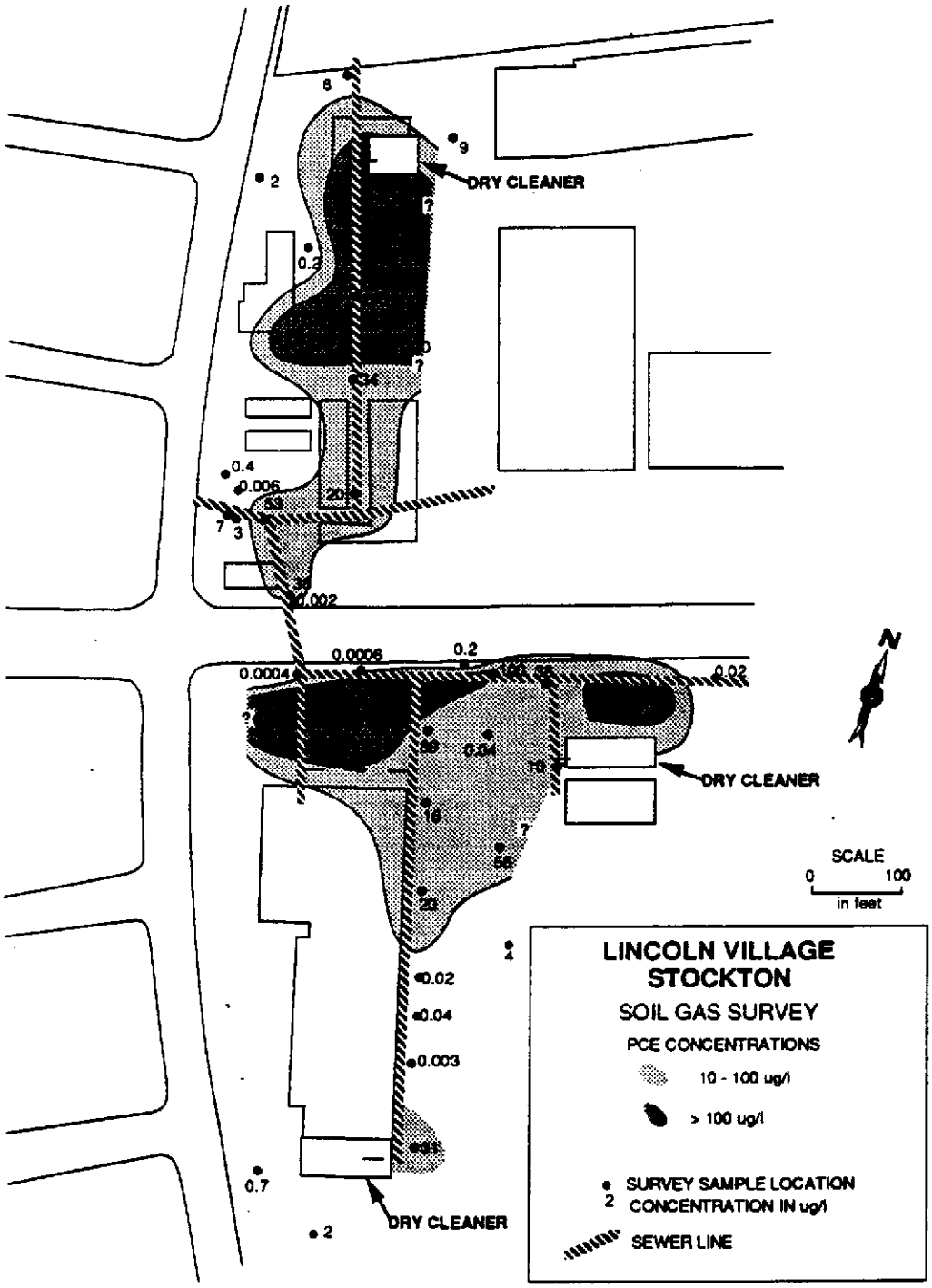


Figure 17

SEWER MAIN SAMPLING

Three samples are usually taken from the sewer: an upgradient, a downgradient and a flush sample. The upgradient (background) and downgradient samples are taken at the sewer access just above and below where the dry cleaner's sewer lateral enters the main (Figure 18). All samples are taken by placing a jar on a pole and scooping liquid into the jar. The liquid is then poured into volatile organic analysis (VOA) bottles and sent to a California certified lab for analysis. The flush sample is taken after stirring up the bottom sediment by adding large quantities of water (and sometimes running a ball down the line). The flush sample is taken at the downgradient sewer access, when an increase of flow is noted (Figure 18).

The concentration of PCE in the downgradient sample has always exceeded that in the upgradient sample, and in most cases PCE in the upgradient sample was not detected. When flush samples were taken, their PCE content almost always exceeded that in the downgradient sample. Since water is being added to the system, one would expect the PCE concentration to decrease in the flush sample because of dilution. Therefore, the increase indicates that PCE liquids or sludges are sitting on the bottom of the sewer line.

SEWER SAMPLING ADJACENT TO DRY CLEANERS

	Upgradient in ppb	Downgradient in ppb	Flush in ppb
MERCED			
Merced Laundry	-	180	-
One Hour Martinizing "R"	NF	110	23,000
One Hour Martinizing "G"	NF	730	96,000
Simpson Cleaners	-	-	6,300
Sunshine Cleaners	NF	-	167,000
Parkway Cleaners	NF	853	280,000
SACRAMENTO			
Southgate Norge Cleaners	NF	350	830
ROSEVILLE			
Deluxe Cleaners	-	120	260
Tillets Cleaners	NF	28	380
TURLOCK			
Carr's Cleaners	<0.5	14	2.5
Snow White Cleaners	1,800	3,800	220
Turlock Cleaners	NF	3,500	<25
Bright Cleaners	<0.5	0.6	23,000
Durite Cleaners	35	190	<5
LODI			
Busy Bee	NF	700	280,000
Woodlake Cleaners	-	620	210,000
Guild Cleaners	<0.5	24	<5
	Median	190	3,565
	Average	748	67,937

NF - NO FLOW

Figure 18

CITY OF MERCED

Between 12 January and 2 February 1989, the City of Merced conducted soil sampling near four dry cleaners. The City staff did a video scan of the sewer lines at each of the cleaners to check for possible leaks. After these scans, they drilled a soil boring adjacent to the sewer line downgradient of each facility where a problem was seen on the video tape. If the tape showed no problem, they drilled adjacent to the sewer line near the dry cleaner. In each boring they took several soil samples and had them analyzed for VOCs by EPA Method 8010. They also took soil vapor measurements using a Sensidyne-Gastec system (similar to Draeger tubes) with a detection limit of 400 ppb.

In addition to the City's work, each dry cleaning facility had a monitoring well (MW) drilled as required by staff. Soil samples were taken every five feet during drilling and analyzed for VOCs using EPA Method 8010. One ground water sample was taken from each well and analyzed for VOCs using EPA Method 601.

Parkway Cleaners

Figure 19 contains the data from the Parkway Cleaners site. The MW was drilled approximately 22 feet from Parkway's sewer lateral and 15 feet from the sewer main. Soil samples from the well boring had low levels of PCE (<5 ppb). The concentration of PCE in the ground water was 160 ppb.

The City's video scan of the sewer main showed no breaks in the clay pipe. Because of this, the City arbitrarily selected a soil boring site adjacent to the sewer line, six feet downgradient from Parkway Cleaners' sewer lateral. The PCE concentration in the soil sample in the City soil boring was 120 times

PARKWAY CLEANERS

MERCED

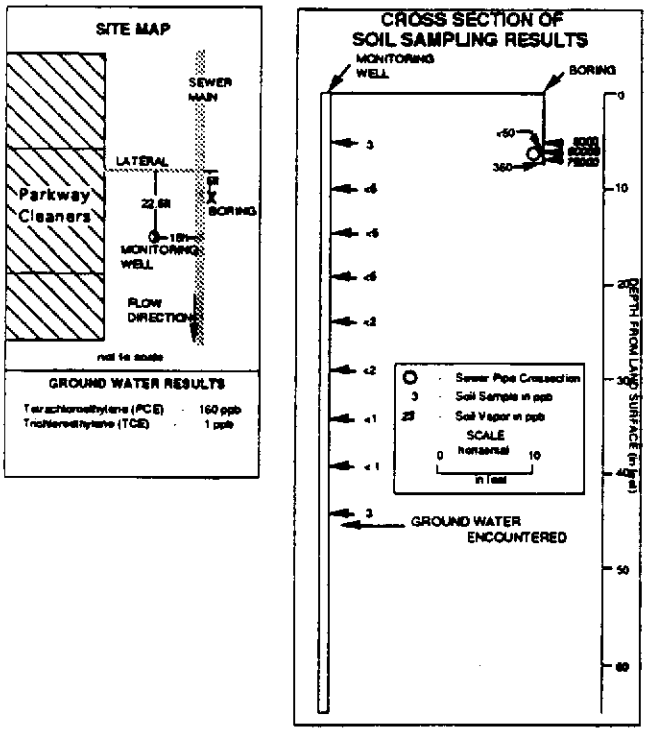


Figure 19

higher than was found in the MW. Also, soil vapor samples in the City boring contained up to 80,000 ppb PCE.

At this location the levels in the soil are much higher adjacent to the sewer line than in the MW. Also the data from the sampling adjacent to the sewer line indicate that PCE has moved from the line into the adjacent soils.

Simpson's Cleaners

Figure 20 illustrates the data from the Simpson's Cleaners site. Soil samples taken during the drilling of the MW at the southwest corner of the facility had PCE levels from non-detect to 71 ppb. The shallow ground water sample had 270 ppb PCE and also contained 29 ppb trichloroethylene (TCE), 65 ppb cis-1,2dichloroethene (DCE), two ppb trans-1,2-DCE, and 6 ppb 1,2-dichloroethane, all of which are breakdown

SIMPSON'S CLEANERS

MERCED

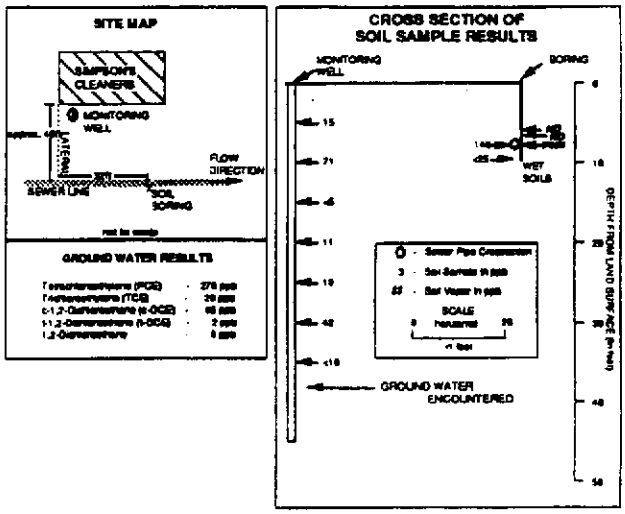


Figure 20

products of PCE. The MCL for TCE is 5 ppb and for DCE is 6 ppb.

The City's video scan of the clay sewer main adjacent to the cleaners showed a break at one of the joints. This break is approximately 40 feet downstream along the sewer line from the southeast corner of Simpson's Cleaners. While drilling alongside this joint the soil became very wet. One of the soil samples had 140 ppb PCE, higher than samples taken from the MW boring. The soil gas measurement readings were non-detect.

Again the soil sample adjacent to the sewer line contained higher PCE levels than samples taken from the MW boring. One probable reason the soil gas measurements were non-detect at the joint was the soils were very wet, which means the soil pores were probably full of water leaving no available room for the soil vapor.

Sunshine Cleaners

Figure 21 contains the data from the Sunshine Cleaners site. The MW was drilled near the northeast corner of the cleaners, 9.5 feet from its sewer lateral. The soil samples from the MW had PCE concentrations up to

SUNSHINE CLEANERS

MERCED

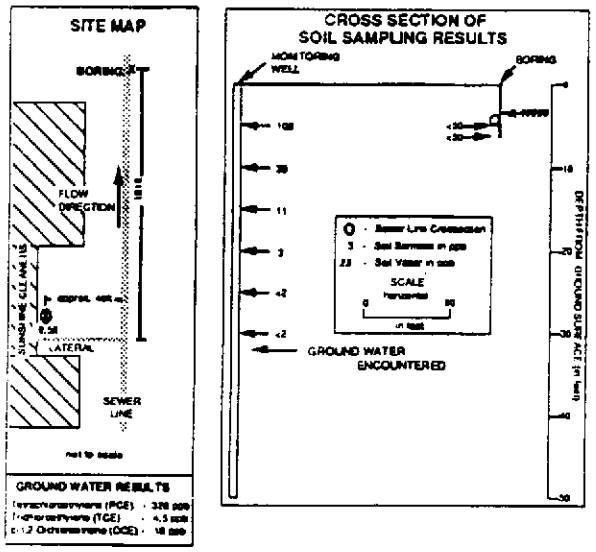


Figure 21

100 ppb. The ground water sample had 320 ppb PCE, 4.5 ppb TCE and 18 ppb DCE.

The City's video scan of the sewer line showed no breaks in the concrete sewer main. The City personnel chose a sag in the sewer main where the water pools for the location of the adjacent soil boring. This site was 181 feet downgradient of the cleaner's sewer lateral. PCE in the soil samples was nondetect, but the detection limit was high at 50 ppb. The Sensidyne-Gastec vapor system had a reading of 40,000 ppb in the boring.

The high levels detected by the Sensidyne-Gastec system indicates even at a distance of 181 feet downgradient from the dry cleaner, the concentration of PCE in the soil gas is significant. No comparison of soil samples between the MW and City's soil boring can be made because of the high detection limit from the City's samples.

One Hour Martinizing "R" Street

Figure 22 shows the data from the One Hour Martinizing "R" Street site. The MW was drilled eight feet northwest of the sewer line approximately 16 feet

ONE HOUR MARTNIZING

R STREET, MERCED

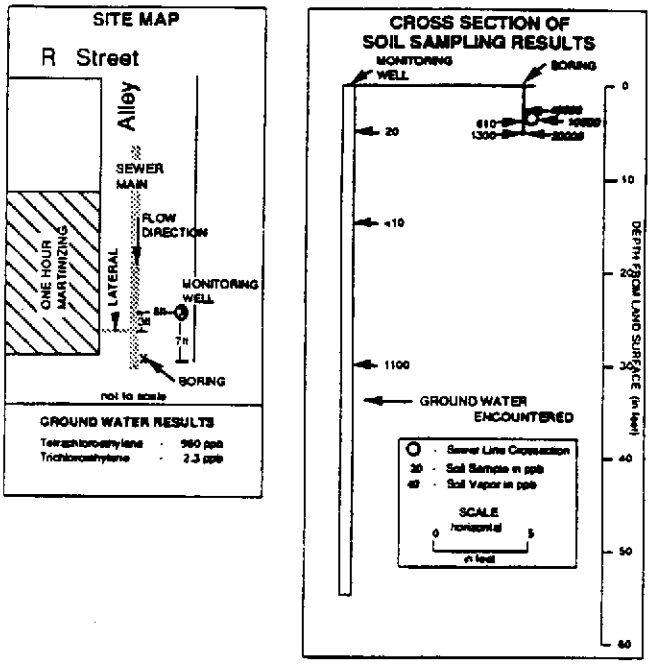


Figure 22

from the cleaner's northwest wall. PCE levels in the soil samples taken during drilling of the MW were low in the upper 20 feet ranging from nondetect to 20 ppb, but near the ground water a soil sample had 1,100 ppb PCE. The ground water sample had PCE and TCE with concentrations of 960 ppb and 2.3 ppb, respectively.

The City's video scan of the clay sewer line showed no breaks. The City personnel decided to drill adjacent to a bell joint four feet downgradient from where the cleaner's sewer lateral intersects the sewer main. Soil samples in this boring had PCE at 610 ppb (depth 46") and 1,300 ppb (depth 63"). The City took three Sensidyne-Gastec system measurements at the following depths from the surface: 36" (above the main), 46" (bottom side of pipe) and 63" (below the main), and the readings were 40,000 ppb, 10,000 ppb and 20,000 ppb, respectively.

Along the sewer main, the soil gas measurements and

the soil samples had high levels of PCE, indicating that at this location the sewer main is discharging PCE.

THEORIES ON HOW PCE LEAKS FROM SEWER LINES

Based on staff field work and research, there are five likely methods by which PCE can penetrate the sewer line:

1. Through breaks or cracks in the sewer pipes
2. Through pipe joints and other connections
3. By leaching in liquid form directly through sewer lines into the vadose zone
4. By saturating the bottom of the sewer pipe with a high concentration of PCE-containing liquid and then PCE volatilizing from the outer edge of the pipe into the soils
5. By penetrating the sewer pipe as a gas

The literature indicates that all sewer lines leak to some extent. According to Metcalf and Eddy, Inc., "When designing for presently unsewered areas or relief of overtaxed existing sewers, allowance must be made for unavoidable infiltration..." (6). If the soils become saturated and liquids can infiltrate, then a conclusion can be made that liquids on the inside of the pipe can exfiltrate when soils are not saturated.

Below is a brief description of the five methods.

Methods 1 and 2

Methods 1 and 2 are similar in that leakage of liquid is caused by a failure of the sewer pipe system. The failure could be catastrophic, causing large volumes of liquids to leave the system, or could consist of many small leaks causing constant smaller flow. These discharged liquids then would move down through the vadose zone to the ground water. Methods 1 and 2 also apply to PCE in vapor form which can move easily through breaks, cracks, joints, and other connections.

Many of the sewer lines have low spots in which liquids accumulate. These low spots are caused by settlement or poor construction which causes the sewer line to bend. Sewer pipes are brittle, so when the line bends, fractures are likely to occur, increasing the leakage of the pipe. Since PCE is heavier than water (1.63 times the weight of water at 20°C), it tends to collect in these low spots and then flow through the pipe fractures into the vadose zone.

At pipe joints and other connections, PCE can move out of the sewer as liquid or gas. Also, as the pipes shift after installation, they could separate at the joints, allowing PCE to discharge even more easily to the vadose zone. Current gasket technology and reduction in leakage factors of pipes by the industry has reduced discharges at this point. But most commercial and retail districts in the cities of the Central Valley have pipes that predate this technology.

Method 3

By this method, PCE-containing wastewater or PCE liquid penetrates a sewer pipe without any breaks. In this case liquid leaves the pipe and enters the vadose zone (Figure 23). Sewer pipe is not impermeable to water or PCE. When liquid collects in a low spot of the sewer pipe, it cause an increase in the hydraulic head in the line. This extra head provides a larger driving force downward through the pipe.

From sewer sampling we know that PCE-containing sludges and/or liquids collect on the bottom of the sewer line. Video taping of sewer mains have shown that almost all lines have low points where liquids and sludges collect. Because PCE is heavier than water and is attracted to organic matter, it would have a tendency to collect in these low spots. Also, PCE viscosity is less than that of water (0.9 for PCE versus 1 for water), making it flow easier through a pipe wall than water. This makes the pipe more permeable for PCE.

Method 4

This is similar to Method 3 except that the hydraulic head in the pipe is not large enough to force liquid

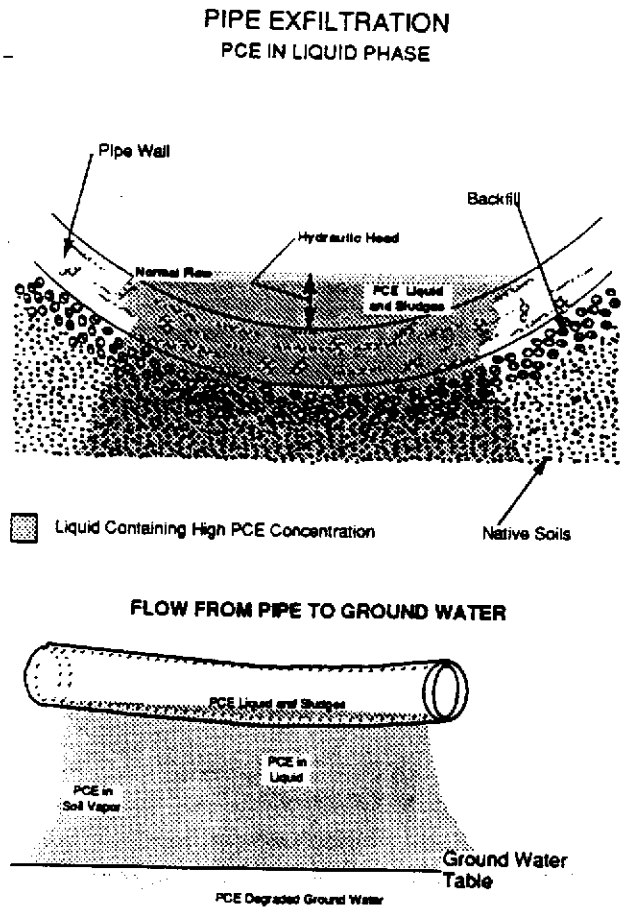


Figure 23

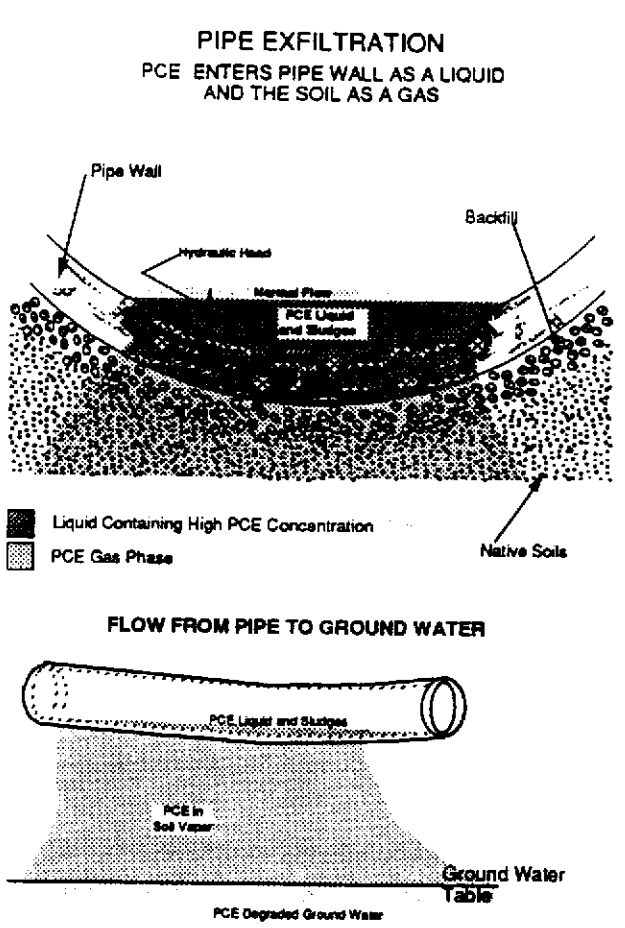


Figure 24

into the vadose zone. In this method, the pipe walls still have a high concentration of PCE-containing liquids (Figure 24). Being volatile, PCE turns into a gas at the liquid-soil vapor interface at the outer edge of the pipe. Since the vapor density of PCE is 5.83 times greater than air, the PCE gas in soil vapor would sink towards ground water, causing ground water degradation.

Method 5

In this method, PCE volatilizes inside the pipe and moves as a gas through the sewer pipe wall (Figure 25). The piping material is not designed to contain gas. The concentration of PCE gas in the pipe is greater than in the surrounding soils causing a concentration gradient. This causes a dispersion through the sewer pipe to the less concentrated area.

Another reason gas will penetrate the pipe is due to pressure. The gasses inside the pipe may increase the pressure above atmospheric. This would cause a pressure gradient from higher pressure in the pipe to lower pressure in the vadose zone. The gradient would force PCE gas into the vadose zone. As described above, PCE gas is heavier than air and so would tend to sink towards ground water.

Summary of Methods

Methods 3, 4 and 5 probably occur in all piping. They would cause a constant influx of PCE into the vadose zone downgradient from a dry cleaner. This liquid containing PCE or PCE in gas form then moves downward and eventually degrades the ground water.

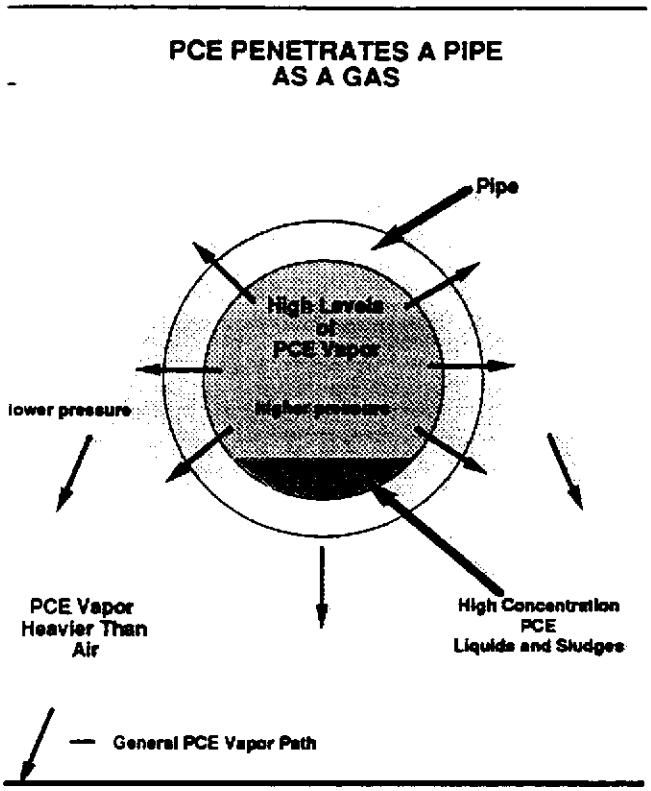


Figure 25

Leakage through small fractures in Method 1 is likely in most of these brittle pipes as they settle. Small fractures occur causing an increase in the permeability of the pipe. This would cause a constant leakage. These small fractures cannot be seen by video taping the inside of the sewer pipe.

CONCLUSION AND RECOMMENDATION

The Board has identified the potential sources of PCE in 21 wells, and 20 of those are affected by one or more dry cleaners. Because of the location of the remaining wells (i.e. in residential and retail areas), the staff expects that the majority of the wells with PCE will have dry cleaners as the source.

The evidence from five years of investigations shows PCE has been found in the ground water and vadose zone near dry cleaners throughout the Central Valley. In most dry cleaners, the only liquid discharge of PCE-containing wastewater is to the sewer line. The substantial evidence collected by dry cleaners' consultants, muncipalities, and staff, shows or demonstrates that PCE has discharged from the sewer lines directly into the vadose zone. The PCE then migrates through the unsaturated subsurface to the ground water. Based on information collected from operators of dry cleaners, dry cleaning literature and staff site inspections, the dry cleaning equipment at most facilities is designed to discharge to sewer lines.

Presently, all the dry cleaners investigated in a well source investigation have been identified as sources of PCE in the ground water. All of the dry cleaners that have drilled monitoring wells have had shallow ground water contamination well above the MCL of 5 ppb set by the State Department of Health Services (monitoring well levels range from 120 - 32,000 ppb). With approximately 285 dry cleaners in the cities of Sacramento, Chico, Lodi, Modesto, Turlock, Stockton and Merced, and numerous more in other cities, staff expects that many more wells will be degraded by PCE in the future.

In conclusion, the PCE discharges from dry cleaners to sewer laterals, then to sewer systems and then to soils have caused soil and ground water degradation.

Two major issues need to be resolved on the dry cleaners' PCE discharges:

1. Who should define the extent of ground water degradation and do the cleanup?

2. How do we prevent further degradation of the ground water by dry cleaners?

Ground water cleanup is required so that water supply agencies can continue to provide safe water. Deciding who should investigate and cleanup ground water is a complex political/legal issue since the PCE discharges from the dry cleaners were all approved, standard practice and those from the sewers were unsuspected. Because most dry cleaners are small businesses, which may not have the financial capability to define the contamination plume and conduct cleanup, other resources may be needed. A statewide cleanup fund may be appropiate. If no one else cleans

up the ground water, water supply agencies will have to do it by default.

To prevent further degradation, the most obvious solutions are to set a limit for PCE discharge levels to the sewer line that will protect ground water or to disallow all future discharges to the sewers from dry cleaning. Two possible ways to accomplish this:

1. State legislation to set limits or prohibit discharge of PCE from dry cleaning facilities to sewer systems.

2. City ordinances to set limits or prohibit any discharge of PCE from a dry cleaning facility to the sewer line.

Since dry cleaners exist throughout the state a state-wide policies are needed.

REFERENCES

1. California Regional Water Quality Control Board, Central Valley Region, Well Investigation Program files
2. Devitt, D.A., R.B. Evans, W.A. Jury and T.H. Starks, Soil Gas Sensing for Detection and Mapping of Volatile Organics, National Water Well Association, 1987
3. Freeze, R.A. and John A. Cherry, Groundwater, Prentice-Hall, Inc. 1979
4. Hotchkiss, William R., Generalized Subsurface Geology of Water Bearing Deposits Northern San Joaquin Valley, California, U.S. Geological Survey Open-File Report, 12 May 1972
5. Halogenated Solvents Industry Alliance, White Paper, Perchloroethylene, August 1987, 3p
6. Installation, Operation & Maintenance Instructions for VIC Kamero Models 402 & 403 (VMC 1025-A), Vic Manufacturing Campany, November 1971
7. Lowry, Polly, Personal Communications (1991), Associate Engineering Geologist, California Regional Water Quality Control Board, Central Valley Region
8. Marshack, Jon, A Compilation of Water Quality Goals, California Regional Water Quality Control Board, Central Valley Region, September 1991, 29p
9. Mendoza, C.A. and Todd A. McAlary, Modeling of Ground-Water Contamination Caused By Organic Solvent Vapors, Ground Water, Vol. 38 No. 2, March-April 1990, p199-206
10. Metcalf & Eddy, Inc., Revised by George Tchobanoglous, Wastewater Engineering-Treatment/Disposal/Reuse, 2nd Edition, McGraw-Hill, Inc., 1979
11. Norge Service Instructions and Part Catalog (DCSMP-61), Norge Sales Corporation, August 1961
12. Page, R.W., Appraisal of Ground-Water Condition in Merced, California, and Vicinity, U.S. Geological Survey Open-File Report 77-454, December 1977
13. Schwille, Friedrich, Dense Chlorinated Solvents in Porous and Fractured Media, Lewis Publisher, Inc. 1988 , 144p
14. Sittig, Marshall, Handbook of Environmental Data On Organic Chemicals, Second Edition, Van Nostrand Reinhold Company, 1983
15. Tillman, N., K. Ranlet and T.J. Meyer, Soil Gas Surveys: Part 1, Pollutant Engineering, July 1989, p86-89
16. Tolby, L.G., Personal Communications (1991), District Manager-Technical Services, National Clay Pipe Institute
17. U.S. Environmental Protection Agency, January 1980, Ambient Water Quality Criteria for Tetrachloroethylene, EPA-440/5-80-073, 38p
18. U.S. Environmental Protection Agency, January 1982, Health Assessment Document for Tetrachloroethylene, EPA-600/8-82-005, 193p
19. Verschuerren, Korel, Handbook of Environmental Data on Organic Chemicals, Second Edition, Van Nostrand Reinhold Company, 1983
20. Walker, Scott, June 1989, Well Investigation Program Assessment Report, City of Merced Wells 3A, 3B, 5, 2A and 2B Merced County, California Regional Water Quality Control Board, Central Valley Region, 29p
21. Weast, R.C., Editor, CRC Handbook of Chemistry and Physics, 70th Edition, CRC Press Inc., 1989
22. Windholz, Editor, The Merck Index, Merck and Co., Inc., 1976