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## Santa Ana Regional Water Quality Control Board

June 16, 2020

Ideal Uniform Rental Service  
c/o Marc C. Forsythe  
Goe & Forsythe, LLP  
18101 Von Karman Avenue, Suite 1200  
Irvine, CA 92612  
([mforsythe@goeforlaw.com](mailto:mforsythe@goeforlaw.com))

Ideal Uniform Rental Service  
c/o Brian M. Ledger  
Gordon & Rees LLP  
5901 Priestly Drive, Suite 308  
Carlsbad, CA 92008  
([bledger@grsm.com](mailto:bledger@grsm.com))

**COMMENTS ON WORK PLAN ADDENDUM FOR SUPPLEMENTAL  
GROUNDWATER WELL INSTALLATION – PURSUANT TO CLEANUP AND  
ABATEMENT ORDER NO. R8-2013-0048 FOR THE FORMER IDEAL UNIFORM  
RENTAL SERVICE SITE; 13811 A BETTER WAY, GARDEN GROVE, CALIFORNIA  
(GLOBAL ID: SL0605946450; PCA# 2080071)**

Dear Messrs. Forsythe and Ledger:

We have completed our review of the “*Work Plan Addendum, Supplemental Groundwater Well Installation*” (work plan addendum) dated April 3, 2020. This document was prepared on your behalf by Geosyntec Consultants (Geosyntec) and was submitted in response to our letters dated February 20, 2020 and February 28, 2020. The investigation work is being conducted as required by Cleanup and Abatement Order No. R8-2013-0048 (CAO) that was issued to you on December 16, 2013, and subsequent CAO amendments, for investigation and cleanup of past discharges of waste associated with the above referenced property (the Site). This letter provides our comments on the work plan addendum and requests additional work.

### ***Proposed Scope of Work***

The following is a summary of the proposed scope of work:

#### ***Off-Site Groundwater Investigation***

- Obtain necessary permits from Orange County Health Care Agency and coordinate access with the City of Garden Grove to the Municipal Yard property located at 13802 Newhope Street in Garden Grove (City Yard).
- Advance six borings using a direct push Cone Penetration Testing (CPT) rig; two borings at each sampling location presented in Enclosure 1, to approximate

WILLIAM RUH, CHAIR | HOPE SMYTHE, EXECUTIVE OFFICER

depths of 50 feet below ground surface (bgs) (intermediate water bearing zone [WBZ]) and 75 feet bgs (deep WBZ).

- Collect one Hydropunch® grab groundwater sample from both the intermediate and deep WBZs at each sampling location (one sample from each boring).
- Submit groundwater samples to a California certified laboratory for analyses of VOCs using US EPA Method 8260B.
- Prepare and submit a memorandum presenting the results of the field work two weeks following receipt of the laboratory results.
- Include recommendations for the installation of additional groundwater monitoring wells, and a proposed schedule for installation, development and sampling of the proposed monitoring wells in the memorandum.

### ***Discussion***

Logging of lithology is not proposed in the work plan addendum. Due to the complex geology beneath the City Yard and the limited geologic data available in the proposed investigation area, it is necessary to obtain soil lithology data prior to collecting the grab groundwater samples. The lithologic data can be obtained using the CPT rig, and will be helpful in identifying the optimal depths for collecting the grab groundwater samples, as well as the depths and design of the proposed additional groundwater monitoring wells for each WBZ.

As previously proposed, groundwater monitoring wells will be installed in the Shallow WBZ at the western and northwestern locations of the City Yard (Enclosure 1). You have proposed to collect groundwater samples using direct push technology prior to determining the locations and screened intervals of future off-Site groundwater monitoring wells to be installed in the intermediate and deep WBZs in the western half of the City Yard property. We provided our concurrence with the general locations and field methods for the installation of the proposed wells in our letters dated February 20, 2020, and February 28, 2020. The final construction of the groundwater monitoring wells for each WBZ should be based on the lithologic logs from the CPT fieldwork and the lithology observed in the field during the well installation activities.

The work proposed does not replace the need to fully delineate the volatile organic compounds (VOCs) plume in groundwater resulting from the operation of the former Ideal Uniform Rental Service. Additional groundwater investigation may be required pending the results of this phase of groundwater investigation.

### ***Comments***

We concur with your proposal to collect grab groundwater samples at the City Yard property prior to the installation of additional groundwater monitoring wells. In addition, the following comments must be addressed:

1. Soil lithology data must be collected using the CPT rig prior to collecting the grab groundwater samples to aid in determining the sample collection depths.

2. In addition to a trip blank, field and equipment blanks must always be collected during groundwater sampling fieldwork.
3. Please notify our staff a minimum of 7 days prior to conducting any fieldwork both on and off-Site.
4. As proposed in the work plan addendum, the memorandum must be submitted within **two weeks (14 days)** of receipt of the analytical results from the grab groundwater samples.

Note that the due date listed above for the submittal of the required technical report supersedes the due dates stipulated in Provision 14. a. of the CAO, and any amendments thereto. All other aspects of the CAO, and any amendments thereto, remain in full force and effect. Pursuant to section 13350 of the California Water Code, failure to comply with the requirements of CAO No. R8-2013-0048 by the dates specified above may result in civil liability administratively imposed by the Regional Board in an amount up to five thousand dollars (\$5,000) for each day of violation.

If you have any questions, please contact Maile Gee, at (951) 782-4379, or by email to [maile.gee@waterboards.ca.gov](mailto:maile.gee@waterboards.ca.gov), or you may contact Nick Amini, Chief of the Site Cleanup Section, at (951) 782-7958, or by email at [nick.amini@waterboards.ca.gov](mailto:nick.amini@waterboards.ca.gov).

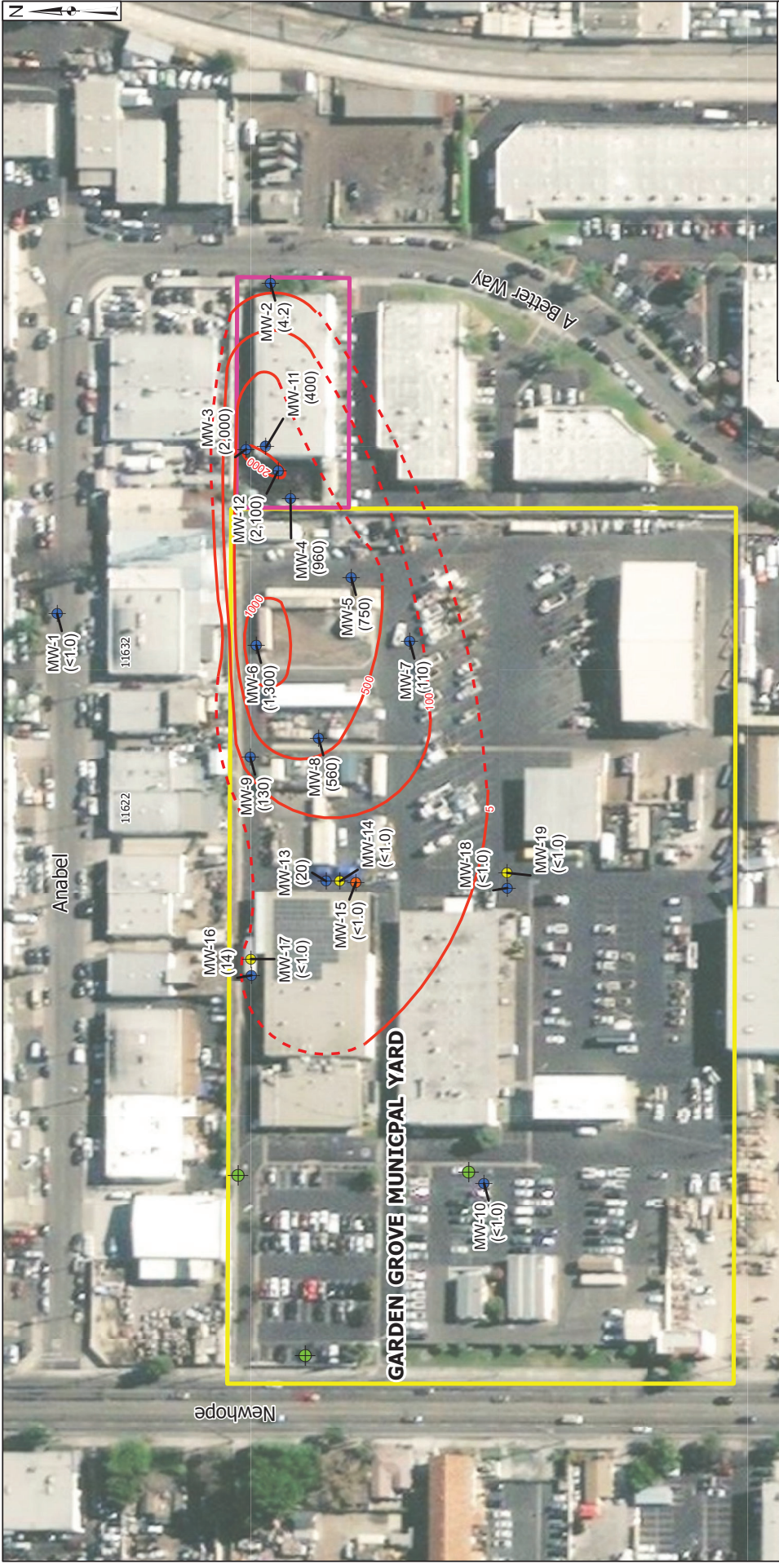
Sincerely,

 Digitally signed by  
Jayne Joy  
Date: 2020.06.16  
12:57:05 -07'00'  
Water Boards

Hope A. Smythe  
Executive Officer

Enclosure 1 – Proposed Intermediate and Deep WBZ Groundwater Sampling Locations, Geosyntec, April 3, 2020)

cc: A. J. Holmon – City of Garden Grove ([ajh@ci.garden-grove.ca.us](mailto:ajh@ci.garden-grove.ca.us))  
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([laura.drabandt@waterboards.ca.gov](mailto:laura.drabandt@waterboards.ca.gov))  
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([BLanga@ddsffirm.com](mailto:BLanga@ddsffirm.com))



**Proposed Intermediate and Deep Groundwater Grab Sample Locations**  
Former Ideal Uniform Facility  
Garden Grove, CA

Geosyntec consultants  
Project No: HR1531 March 2020

Figure 1

**Legend**

- Shallow Groundwater Monitoring Wells (Blue dot)
- Intermediate Groundwater Monitoring Wells (Yellow dot)
- Deep Groundwater Monitoring Wells (Green dot)
- Proposed Intermediate and Deep Groundwater Grab Sample Location (Green cross)
- Site Boundary - Former Ideal Uniform Facility (Pink outline)
- Site Boundary - Garden Grove Municipal Yard (Yellow outline)
- December 2019 PCE Concentration Contour (in  $\mu\text{g/L}$ ) for shallow zone (dashed where inferred) (Red dashed line)
- 100  $\mu\text{g/L}$  (Red solid line)

**Note:**  
Concentrations from Intermediate and Deep zone wells MW-14, -15, -17, and -19 not used for contouring.