



Department of Toxic Substances Control

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March 26, 2013

Mr. Edward Modiano
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REVIEW OF 5-YEAR REMEDY REVIEW REPORT JULY 2004 – MARCH 2010
CHATHAM SITE, ESCONDIDO, CALIFORNIA (SITE CODE: 400029)

Dear Mr. Modiano:

The Department of Toxic Substances Control (DTSC) has reviewed the *5-Year Remedy Review Report July 2004 – March 2010 Chatham Site, Escondido, California* (Report), dated June 28, 2010 and received by DTSC in July 2010. The Report was prepared by Hargis and Associates (H+A), Inc.

DTSC also reviewed numerous irrigation well permit applications for property owners within the Felicita Hydrologic Sub Area (FHSA) where the Site contaminant plume is located. DTSC has recommended that groundwater extraction wells not be permitted within the FHSA until the groundwater contaminant plume from the Site is remediated.¹ Significant progress to reduce shallow contamination at the Chatham property has occurred, but more work is necessary to investigate and cleanup the contaminant plume.

Additionally, DTSC reviewed letters from the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board)² and participated in discussions with the San Diego Water Board, the Potential Responsible Party (PRP) Group, and their consultants related to issues with the Report. The meeting topics discussed included:

1. The continued discharge of site-related contaminants detected in Felicita Creek;

¹ DTSC, *Installation of Proposed Irrigation Well at 2337 Orange Avenue, Escondido, California*, April 12, 2012.

² San Diego Water Board, *Chatham Brothers Barrel Yard Site, 2257 Bernardo Avenue, Escondido California*, October 20, 2010 and *Chatham Brothers Barrel Yard Site, PRP Group Response to San Diego Water Board Comments on the Final Five Year Remedy Review Report*, November 1, 2012.

2. Increasing trends of site-related contaminants detected in regional water supply wells; and
3. The time frame for the natural attenuation of site-related contaminants.

Therefore, DTSC considers the revised Report conditionally acceptable while we await completion of the following requirements. The requirements noted in this memorandum are site-specific and should not be construed as policy decision applicable to other sites.

REQUIREMENTS

The following requirements are based on our review of the Report data:

1. Additional remedial actions may be necessary to remove site-related contaminants³ discharging into Felicita Creek. Contaminant pathways to the creek need to be identified in order to propose effective mitigation measures to reduce the concentrations and stop the flow of contaminants into Felicita Creek. Submit a Felicita Creek Technical Memorandum before the April 2013 monitoring event describing additional investigations and reporting what should be performed to determine the contaminant pathways flowing into Felicita Creek. The Technical Memorandum must propose investigations to identify the groundwater contaminant pathways from the site to Felicita Creek. The Technical Memorandum should identify effective methods to limit or eliminate the discharge of site-related contaminants into Felicita Creek. The Felicita Creek Technical Memorandum should include map(s), hydrogeologic cross-sections, figures, sampling methods, reporting requirements, procedures, and a completion schedule for all actions proposed in the Technical Memorandum.
2. Based on the Report data, site-related contaminants were detected above MCLs in several water supply wells and show increasing concentration trends from the initial sampling event to present. A water supply well Contingency Plan (Contingency Plan) should be submitted that includes the following minimum elements:
 - a) Installation of a groundwater monitoring well network to detect site-related constituents impacting the water supply wells;
 - b) Sampling groundwater from future water supply wells that includes a contingency for when well head treatment would be required; and
 - c) Monitoring and reporting.

³ Tetrachloroethylene, Trichloroethylene, cis-1,2-dichloroethylene, vinyl chloride, 1-4, dioxane.

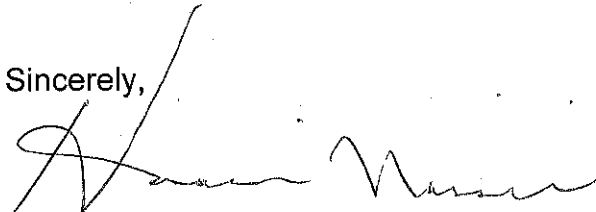
The Contingency Plan must be submitted no later than **May 31, 2013**, and implemented upon approval of DTSC.

3. The Conceptual Site Model (CSM) should be updated and all data gaps identified through the entire saturated zone where contaminants are detected or potentially detected. The CSM should include all portions of the plume, on-site and off-site, and evaluate migration pathways to receptors. Additionally, the updated CSM should include data, interpretations, and a discussion of the level of uncertainty of conclusions. Additional investigations may be required to assess data gaps identified in the CSM. The updated CSM should be submitted by **June 28, 2013**.
4. Additional remedial actions are necessary to restore water quality in groundwater impaired by the discharge so that the groundwater resource can be further developed in the basin. Submit a Groundwater Technical Memorandum describing additional remedial actions that may be needed to restore water quality in the FHSA. The Technical Memorandum should be submitted by **July 30, 2013** and include reporting requirements, procedures, and a completion schedule for proposed remedial actions.

Based on the information and analyses provided in the Report, and to be provided pursuant to the Technical Memorandums identified above, additional actions by the PRP Group may be required.

If you have any questions regarding this letter, please contact me at, (714) 484-5384 or at hossein.nassiri@dtsc.ca.gov.

Sincerely,



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