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## **Bonneau Dickson, P.E.**

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**Consulting Sanitary Engineer**

# **FORENSIC ENGINEERING RESUME**

## **PCE CONTAMINATION**

### **Bonneau Dickson, P.E.**

Education: Georgia Institute of Technology  
B.S. Civil Engineering -- 1960  
M.S. Sanitary Engineering -- 1964

Harvard University  
M.A. Sanitary Engineering -- 1965

Harvard Business School  
Master of Business Administration -- 1975

Registration: Civil Engineer -- California # 19491

Professional Affiliations: Water Environment Federation  
California Water Environment Association  
American Water Works Association  
National Onsite Wastewater Association  
California Onsite Wastewater Association  
Pipe Users Group Of Northern California

**Hartford V. City Of Lodi, CA.** Served as an expert witness in a case in which the City of Lodi was attempting to have a group of insurance companies pay for the cost of remediating several PCE plumes. Issues that were addressed included: standard of care for maintenance of the sewer system; which part of the sewer system leaked; the City's procedures over time for permitting dry cleaners; and the reasonableness of the City's response when the PCE problem was discovered.

**Harz V. Zell, Santa Barbara, CA.** Served as expert witness in a case involving groundwater contamination by perchloroethylene (PCE) and trichloroethylene (TCE). The sources of the contaminants were two dry cleaners and one vehicle maintenance facility. The issues addressed by my opinions included: leakage from sewer systems; City maintenance of the sewer system; standards for construction of sewers and laterals; and the interaction of the sewer and the trench system in which it is placed. The case was in Federal court because the vehicle maintenance facility belonged to the U.S. Postal Service.

**Adobe V. Taeckers, Woodland, CA.** Served as an expert witness in a complicated case involving leakage of PCE into and out of the City sewer system from a dry cleaning establishment in a shopping center. The case was in Federal court. Also served in subsequent proceedings.

**PCE Contamination Beneath A Restaurant, San Mateo, CA.** Served as an expert witness in a case where PCE contamination beneath a restaurant from a dry cleaner next door created odors that rendered a portion of the facilities unusable.

**North Bay PCE Groundwater Contamination, CA.** Provided technical advice to attorneys representing persons who had lived near a dry cleaner and whose source of water was a shallow well. The well water was found to be contaminated with PCE. Issues involved whether the PCE leakage had come from the building lateral or the sanitary sewer.

**MGP IX Lincoln Station, LLC V. City of Cerritos, CA.** Served as an expert witness in a case where PCE from a dry cleaner in a shopping center and TCE from an automobile dealership that had occupied the site in the past leaked from the City sewer and created a plume under the shopping center.

**Davis, CA.** Served as an expert witness in a case where there was a PCE plume beneath a building that housed a dry cleaner in the past and a printing company in the past and present. The printing company used TCE for cleaning its presses but denied having ever spilled any of it. A main issue was where the PCE and/or TCE had leaked--from the lateral or from the city sewer. Noted that the proposed remediation plan only covered the site of the building, not the city street.

**Bay Area, CA.** Provided sanitary engineering advice in a case where there was contamination from a gasoline station and from several dry cleaners. Issues involved the ease of maintenance of the sewer system and movement of vapor through the sewer system. Addressed the applicability of the Izzo report.

**Davis, CA.** Served as an expert witness in a case where PCE was released from a dry cleaner in a strip mall. A major issue in the case was whether the PCE release was from the lateral on the property or from the City sewer system. Determined that the dry cleaner had discharged wastewater to a separate drain that ran to the City street. The case was complicated by the fact that the adjacent property had been a gasoline station that had created an overlapping plume and that remediation of this site was continuing.

**City Of Sunnyvale, CA.** Provided technical advice on the effect of sewer blockages on the escape of PCE from the City sewer system. The blockages were due to grease from "restaurant row", which was just downstream from the sites of several dry cleaners. Issues included the effect of surcharging the sewer on the sealing layer (colmation) that tends to build up at the joints and leaks in sewer pipes and whether releases due to surcharging are sudden and accidental.

**Northern California Site.** Served as a technical expert in a complicated case in which there were comingled plumes of PCE and other contaminants from several dry cleaners and a gasoline station. High concentrations of PCE existed not only at the sites of the dry cleaners and gasoline station but also elsewhere. Issues included who should be listed as a potentially responsible party.