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-	Attornevs for Petitioners	· ·
7	BEFORE THE	CALIFORNIA
8	STATE WATER RESOT	RCES CONTROL BOARD
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10	MARIE TOWLE AS TRUSTEE OF THE	2011 REGIONAL WATER OUALITY
11	ROSE MARIE TOWLE REVOCABLE	CONTROL BOARD, CENTRAL COAST
	TRUST; JOHN L. DEMOURKAS, AS	REGION APPROVAL OF REVISIONS
12	TRUSTEE OF THE JOHN L.	TO MONITORING AND REPORTING PROCEMMINO P3_2005.01/3 AND
13	JOHN RIDELL, AS TRUSTEE OF THE	ENDORSEMENT OF MONITORED
	CHRISTINA DÉMOURKAS 2008 TRUST;	ATTENUATION
· 14	STEPHANIE MARIE REDDING, AS	
15	REDDING 2008 TRUST FUSA ANN	
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16	ANN REDDING 2008 TRUST; and	
1 ~7	WELLS FARGO BANK, AS TRUSTEE	
. 17	IRREVOCABLE TRUST.	
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. 10	Petitioners,	
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	REGIONAL WATER QUALITY	
21	CONTROL BOARD, CENTRAL COAST	
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	Respondent,	
,23	DENICO ENICODEDS INC and ADCADIS	
24	U.S., INC.,	· · ·
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25	Real Parties in Interest.	
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INTRODUCTION. 1 Ϊ.

This Petition is from a decision by a Regional Water Quality Control Board to 2 endorse natural attenuation, without further active remediation, and a reduction in the 3 frequency of monitoring from quarterly to annually, for a site where current levels of TCE in groundwater are as high as 3,300 micrograms per liter (ug/l), and vinyl chloride 5 concentrations are as high as 1,900 ug/l. As set forth herein, these levels of contamination 6 are unacceptably high, and further investigation and remediation of the site are necessary. 7 Petitioners Levon Investments, LLC; Rose Marie Towle, as Trustee of the Rose 8 Marie Towle Revocable Trust; John L. Demourkas, as Trustee of the John L. Demourkas 9 10 Revocable Trust; John Ridell, as Trustee of the Christina Demourkas 2008 Trust; Stephanie Marie Redding, as Trustee of the Stephanie Marie Redding 2008 Trust; Elisa 11 Ann Redding, as Trustee of the Elisa Ann Redding 2008 Trust; and Wells Fargo Bank, as 12 Trustee of the Jheri Elias Redding 1983 Irrevocable Trust (collectively, "Petitioners")¹ 13 hereby petition the action taken by the Executive Officer of the Regional Water Quality 14 Control Board, Central Coast Region ("Regional Board") by letter dated May 13, 2011 (the 15 "May 13 Action"), whereby the Regional Board approved a revised Monitoring and 16 17 Reporting Program No. R3-2005-0143 and endorsed a "monitored attenuation approach" to the remediation of contamination originating from the property located at 26 Coromar 18 Drive, Goleta, California (the "Renco Property"), which property is owned by Respondent 19 Renco Encoders, Inc. ("Renco"). A copy of the Regional Board's May 13, 2011 Action is 20 attached as Exhibit A to the Declaration of Emily L. Murray ("Murray Decl.") submitted 21 22 herewith.

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Petitioners are the owners of property located at 147-165 Castilian Drive in Goleta, California ("Petitioners' Property"), which is adjacent to and hydrogeologically 24 downgradient from the Renco Property. Contamination originating from the Renco 25 Property has impacted Petitioners' Property. As set forth in a letter dated June 10, 2011 26 27

Petitioners may be contacted through the address, telephone number, and email address of counsel, provided on the caption of this petition.

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from Petitioners' consultant, Padre Associates, Inc. ("Padre"), to the Regional Board,
 concentrations of TCE and vinyl chloride remain very high on Petitioners' Property – much
 higher than remaining concentrations on the Renco Property. (See Murray Decl., Ex. B.)
 It-is-Padre's-opinion-that-the-TCE-and-vinyl-chloride-contamination-on-Petitioners'
 Property has not been effectively remediated, and that further investigation and
 remediation of Petitioners' Property is necessary, even if not necessary for the Renco
 Property. (See id.)

Upon information and belief, Renco and their consultant Arcadis U.S., Inc.
("Arcadis"), formerly LFR/Levine Fricke, provided information regarding the current
status of remediation of the Renco Property and Petitioners' Property to the Regional
Board in a meeting on January 5, 2011 and by letter dated March 7, 2011. (*See* Murray
Decl., Ex. C, March 7, 2011 letter from Arcadis to the Regional Board, with enclosures.)
Petitioners were not invited to or made aware of the January 5, 2011 meeting, nor were
Petitioners provided with the March 7, 2011 letter until after the May 13 Action.

In apparent reliance on the information provided by Renco and Arcadis in the 15 January 5, 2011 meeting and March 7, 2011 letter, the Regional Board sent a letter to 16 Arcadis dated May 13, 2011, which purported to "confirm[] our ... agreement to revise 17 existing Monitoring and Reporting Program No. R3-2005-0143 (MRP)." (See Murray 18 Decl., Ex. A.) The approved revisions to Monitoring and Reporting Program No. R3-19 2005-0143 include reduced frequency of monitoring (quarterly to annually) and removal of 20 some monitoring wells. The Regional Board's May 13, 2011 letter further stated that 21 "[d]ecreasing water concentrations and the success of the source zone remediation support 22 ... a monitored attenuation approach." (See id.) 23

As set forth herein, Petitioners allege that Arcadis – who on information and belief has a financial stake in obtaining "closure" of the Renco Property from the Regional Board – failed to clearly present to the Regional Board relevant information regarding the current status of contamination on Petitioners' Property. In fact, TCE and vinyl chloride contamination levels remain high, and in the case of vinyl chloride are rising, on

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Petitioners' Property, suggesting the need not only for monitoring to continue on
 Petitioners' Property at a quarterly rate, but also for additional investigation and
 remediation on Petitioners' Property. (See Murray Decl., Ex. B.) Therefore, the Regional
 Board's-May-13-Action-was-inappropriate-and-improper, and Petitioners-are-aggrieved,
 because the May 13 Action supports reduced monitoring and endorses a remediation
 method that is insufficient to remediate Petitioners' Property. (See id.)

Petitioners therefore request, pursuant to Water Code section 13320 and California
Code of Regulations, Title 23, section 2050 *et seq.*, that the State Water Resources Control
Board ("State Board") direct the Regional Board to revise its May 13 Action as follows:

 At least for Petitioners' Property, reinstate the frequency of monitoring in the prior version of Monitoring and Reporting Program No. R3-2005-0143;

 Order Renco and Arcadis to evaluate and quantify the potential for vapor intrusion into the buildings located on Petitioners' Property; and

(3) Order Renco and Arcadis to conduct additional remediation, including further substrate injections, on Petitioners' Property until the TCE and vinyl chloride concentrations on Petitioners' Property are reduced to concentrations at or below those currently observed on the Renco Property.

This Petition is being served upon the Regional Board, counsel for Renco, and
Arcadis simultaneously with service upon the State Board. While all of the information
contained in this Petition has previously been provided to the Regional Board, Petitioners
did not have an opportunity to raise these concerns before the Regional Board prior to the
May 13 Action because Petitioners were not included in the prior communications between
Arcadis and the Regional Board, and Petitioners were not made aware that the May 13
Action would be forthcoming.

Petitioners request a hearing before the State Board to present the arguments
contained herein and evidence submitted herewith. Petitioners were not provided with an
opportunity for such a hearing before the Regional Board prior to the May 13 Action.

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1 II.

FACTUAL BACKGROUND.

Renco's Contaminated Property and Contract with LFR/Arcadis. 2 A. Since 1972, a variety of electronics manufacturing business have operated on the 3 Renco-Property. Chlorinated solvents-were used during these operations, and their 4 disposal resulted in a release of chlorinated solvents to the soil and groundwater 5 underneath the Renco Property. Remediation efforts at the Renco Property and adjacent 6 properties have been ongoing since 1992. (See Murray Decl., Ex. D, Investec Properties 7 Assessment Report and Remedial Action Plan and Substrate Injection Workplan for the 8 Renco Encoders Site, June 29, 2009 ("2009 RAP").) 9

Upon information and belief, Renco and LFR (predecessor to Arcadis) entered into 10 a Guaranteed Environmental Remediation Agreement or the equivalent, whereby LFR 11 agreed - for a fixed price - to remediate the Renco Property to closure. In other words, 12 LFR "stepped into the shoes" of Renco from the perspective of paying for the cleanup and 13 acting as a "responsible party". Upon information and belief, LFR was subsequently 14 acquired by Arcadis, and Arcadis and LFR therefore had and have a substantial personal 15 financial stake in obtaining closure of the Renco Property at the lowest possible cost. 16

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Renco Contaminated Petitioners' Property. **B**.

The Renco Property is located upgradient from Petitioners' Property, and 18 groundwater moves from the Renco Property toward Petitioners' Property under normal 19 conditions. Thus, as a result of Renco's release of chlorinated solvents into the soil and 20 groundwater beneath the Renco Property, the contaminants migrated from the Renco 21 Property to Petitioners' Property, contaminating both the soil and the groundwater beneath 22 Petitioners' Property with TCE and other chlorinated solvents. (See, e.g., Murray Decl., 23 Ex. B.) 24

In 2006, the Regional Board directed Renco to investigate the extent of 25 contamination in the soil and groundwater at Petitioners' Property. Renco's investigation 26 revealed elevated levels of PCE and other chlorinated solvents at Petitioners' Property. 27Thereafter, LFR falsely asserted the existence of a "second source" on Petitioners' 28

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Property, contributing to the contamination. Consequently, the Regional Board ordered
 Petitioners to investigate the source of the contamination at Petitioners' Property.
 Following that investigation, on August 27, 2008, the Regional Board concluded that
 historic operations on Petitioners' Property were not a source of the contamination on
 Petitioners' Property. (See Murray Decl., Ex. E, Regional Board August 27, 2008 Order.)
 The Regional Board thereafter admonished LFR/Arcadis for repeatedly attempting to
 reassert their "second source" argument. (See, e.g., Murray Decl., Ex. F, Regional Board

9 10

C. The Regional Board Ordered Renco and Arcadis to Remediate Petitioners' Property.

On August 27, 2008, the Regional Board directed Renco to prepare a corrective 11 action work plan to investigate and remediate the contamination on both the Renco 12 Property and Petitioners' Property. (See Murray Decl., Ex. E.) The result was the 2009 13 RAP. (See Murray Decl., Exs. D, F.) The stated purpose of the 2009 RAP was "to 14 effectively remediate non-source TCE areas" on the Petitioners' Property. (See Murray 15 Decl., Ex. D 2009 RAP, Section 6.0) The 2009 RAP proposed to accomplish this 16 remediation through enhanced reductive dechlorination remediation injections: "[T]he 17 proposed substrate injections described [in the RAP] are both appropriately targeted and 18 sufficient in mass" to achieve that objective. (Id.) Arcadis anticipated "similar results in 19 successfully reducing [chlorinated volatile organic compounds ("CVOCs")] concentrations 20in similar timeframes on [Petitioners' Property] as were observed on the Renco site." (Id. 21 at Section 6.3.3.) 22

The 2009 RAP proposed groundwater monitoring following the injections, the results of which "will be used to verify the onset of complete reductive dechlorination of TCE through intermediate transformation products (cis-1,2-dichloroethene [cDCE] and vinyl chloride [VC] to ethane and ethane." (*Id.* at Section 7.0.) The results of the monitoring were to "be used to confirm development of a sufficiently anaerobic environment with an acceptable range of pH to support optimal dechlorination." (*Id.*) The

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2009 RAP further stated that following the injections in October through November 2010,
 Arcadis "will report on the need for and feasibility of conducting any additional
 injections." (*Id.* at Section 8.0.)

Renco-and-Arcadis-proceeded-to-implement-the-2009-RAP. Historically, Arcadis
has conducted enhanced reductive dechlorination remediation injections at the Renco
Property in at least <u>four</u> separate injection sequences (September 2001; September 2001April 2003; July-August 2006; and October-November 2010). (See Murray Decl., Ex. B.)
However, in implementing the 2009 RAP, Arcadis conducted only <u>one</u> enhanced reductive
dechlorination remediation injection sequence on Petitioners' Property (October-November
2010). (See id.)

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D. 2010 Fourth Quarter Results Show Elevated Levels of Contamination Remain on Petitioners' Property.

As ordered by the Regional Board, Renco and Arcadis monitored the results of 13 implementation of the 2009 RAP. Most recently, on December 14, 2010, Arcadis 14 submitted to the Regional Board the document titled 2010 Fourth Quarter Groundwater 15 Monitoring Report, Renco Encoders Site, 26 Coromar Drive, Goleta, California ("2010 16 Fourth Quarter QMR"). (See Murray Decl., Ex. G, 2010 Fourth Quarter QMR.) This 17 document demonstrated that, while remediation efforts have resulted in improved 18 conditions on the Renco Property, contamination levels on Petitioners' Property remain 19 unacceptably high. (See Murray Decl., Ex. B.) 20

Specifically, as of November 2010, significantly elevated TCE concentrations in
groundwater remain on Petitioners' Property at the locations of groundwater monitoring
well MW-16 (3,300 ug/l), MW-11 (750 ug/l), MW-13 (430 ug/l), MW-14 (230 ug/l), MW15 (160 ug/l), and MW-17 (140 ug/l). (See Murray Decl., Exs. B, G.) All of these
concentrations are well above the Regional Board's applicable remedial action
concentrations and therefore require further active remedial efforts. (See Murray Decl., Karay Decl.,

27 Ex. B.)

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In addition, the remediation activities have not resulted in the complete degradation 1 of TCE, which in turn has resulted in elevated concentrations of vinyl chloride at $\mathbf{2}$ Petitioners' Property. Vinyl chloride concentrations have in fact increased significantly at 3 the-locations-of-several-wells:-MW-11-(from 370-to-1,900-ug/l); MW-16 (from 7.9-to-46-4 5 ug/l); and MW-17 (from 0.79 to 110 ug/l). (See Murray Decl., Exs. B, G.) These wells all are located outside the southeast corner of the building located at 147-153 Castilian Drive 6 on Petitioners' Property. The extent of increased vinyl chloride concentration underlying 7 the building and maximum concentrations are currently unknown at this area of 8 Petitioners' Property. (See Murray Decl., Ex. B.) 9

Thus, the 2010 Fourth Quarter QMR demonstrates that (1) TCE concentrations in
groundwater on Petitioners' Property remain unacceptably high – in one case 3,300
micrograms per liter (ug/l); and (2) concentrations of vinyl chloride are presently as high
as 1,900 ug/l and are on the rise, as a result of TCE degradation, with unknown
concentrations in some areas.

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E.

Arcadis' Misleading Communications with the Regional Board in January and March 2011.

Despite the data described above, contained in their own 2010 Fourth Quarter 17 18 QMR, Arcadis sought in the early part of 2011 to convince the Regional Board that 19 remediation efforts are complete, no further active remediation is necessary, and reduced monitoring is acceptable. Arcadis did so by focusing on the improved conditions on the 20 Renco Property and burying the information regarding the alarming conditions on 21 Petitioners' Property. Arcadis met with the Regional Board in a meeting on January 5, 22 23 2011 and sent a follow-up letter on March 7, 2011. (See Murray Decl., Ex. C.) Tellingly, Arcadis did not invite Petitioners to the January 5, 2011 meeting, nor copy them on the 24 25 March 7, 2011 letter until after the May 13 Action.

Specifically, Arcadis' March 7, 2009 letter states that: "Remediation of the original
area of release at the Renco Site is essentially complete. The source area of the Renco site
has been effectively remediated". (See Murray Decl., Ex. C, emphasis added.) However,

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1	no such conclusions are offered with regard to Petitioners' Property (also referred to as the		
2	Investec property). Instead, Arcadis obliquely suggests that it was not able to achieve		
3	lower concentrations on Petitioners' Property due to "access issues":		
-4-	Treatment-was-conducted-in-accordance-with-the-work-plan		
5	and public right-of-ways limit the ability to directly achieve lower		
6	technology (i.e., direct injection).		
7	(See Murray Decl., Ex. C.) Likewise, Arcadis acknowledges that " less is known		
8	regarding the vapor pathway [from the underlying groundwater] on [Petitioners'		
9	Property]." (See id.)		
10	Arcadis' March 7, 2009 letter is perhaps more notable for what it does not state:		
11	 It does not state that Petitioners' Property has been effectively 		
12	remediated;		
13	 It does not report that the CVOC concentrations on Petitioners' Property 		
14	have been reduced to the levels observed on the Renco Property;		
15	• It does not evaluate the potential vapor intrusion issues that could result		
16	from the increased vinyl chloride levels on Petitioners' Property;		
17	 It does not state that Renco has achieved complete reductive 		
18	dechlorination of TCE or that optimal dechlorination has been achieved		
19	on Petitioners' Property; and		
20	• It does not report on the need for and feasibility of conducting any		
21.	additional injections required to achieve effective remediation.		
22	Nevertheless, despite these omissions, and despite the data in the 2010 Fourth		
23	Quarter QMR, the Arcadis' March 7, 2009 letter concludes that (1) "[n]atural attenuation		
24	will address residual concentrations to achieve water quality objectives over a		
25	reasonable timeframe, which may span a decade or more"; (2) "no further remedial action		
26	(i.e., no substrate injection) is required based upon current data"; and (3) a reduced		
27	monitoring program is appropriate. (See id.)		
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F.

The Regional Board's May 13 Action.

In apparent reliance on the information provided by Renco and Arcadis in Arcadis' $\mathbf{2}$ March 7, 2009 letter, the Regional Board sent a letter to Arcadis dated May 13. 2011. 3 which purported to "confirm[]-our ... agreement to revise existing Monitoring and Reporting Program No. R3-2005-0143 (MRP)." (See Murray Decl., Ex. A.) The approved 5 revisions to Monitoring and Reporting Program No. R3-2005-0143 included reduced 6 frequency of monitoring (quarterly to annually) and removal of some monitoring wells. 7 The Regional Board's May 13, 2011 letter further stated that "[d]ecreasing water 8 concentrations and the success of the source zone remediation support ... a monitored 9 attenuation approach." (See id.) In short, the Regional Board appears to have agreed with 10 Renco and Arcadis that monitored natural attenuation is appropriate, no further active 11 remediation is necessary, and reduced monitoring is acceptable. For the reasons set forth 12 herein, this May 13 Action was inappropriate and improper. 13

- 14 III. ARGUMENT.
- 15

A. Standard for State Board Petition.

Any person who is aggrieved by an action, or a failure to act, by a Regional Water 16 Quality Control Board may file a petition for review with the State Board. (See Water 17 Code § 13320; 23 Cal. Code Regs. §§ 2050-2068.)² Subject to petition are "any action or 18 failure to act by a regional board under subdivision (c) of Section 13225, Article 4 19 (commencing with Section 13260) of Chapter 4, Chapter 5 (commencing with Section 20 13300), Chapter 5.5 (commencing with Section 13370), Chapter 5.9 (commencing with 21Section 13399.25), or Chapter 7 (commencing with Section 13500)...." (Water Code 22 § 13320.) Here, the May 13 Action of the Regional Board was taken pursuant to, inter 23 alia, Water Code section 13267. (See Murray Decl., Ex. A.) 24

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27 ² Petitions must be brought within 30 days; here, the Regional Board action was taken on May 13, 2011; the petition was served by email without exhibits on Friday, June 10, 2011, and by overnight mail with exhibits for delivery on Monday, June 13, 2011. (See 23 Cal. Code Regs. § 2050(b).)

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A petition must provide a "full and complete statement of the reasons the action or 1 2 failure to act was inappropriate or improper" and "[t]he manner in which the petitioner is aggrieved." (23 Cal. Code Regs. § 2050(a).) The State Board may find that the action of 3 the Regional Board, or the failure of the Regional Board to act, was appropriate and 5 proper, or inappropriate or improper. (See Water Code § 13320(c); 23 Cal. Code Regs. § 2052.) Upon finding that the action of the Regional Board, or the failure of the Regional 6 7 Board to act, was inappropriate or improper, the state board may direct that the appropriate action be taken by the Regional Board, refer the matter to any other state agency having 8 jurisdiction, take the appropriate action itself, or take any combination of those actions. 9 10 (See id.) In taking any such action, the State Board is vested with all the powers of the 11 Regional Board. (See id.)

Before taking final action, the State Board may, in its discretion, hold a hearing for
the purpose of oral argument or receipt of additional evidence or both. (23 Cal. Code
Regs. § 2052.)

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B. The May 13 Action was Inappropriate and Improper.

The May 13 Action by the Regional Board was inappropriate and improper because the objectives of the 2009 RAP have not been achieved and because significantly elevated concentrations of TCE and vinyl chloride remain on Petitioner's Property. Further investigation and active remediation is indicated and necessary. The Regional Board's apparent agreement that active remediation is not required is not consistent with the current status of Petitioners' Property nor the Regional Board's mandate to protect water quality. (See Water Code § 13000.)

1. The Objectives of the 2009 RAP Have Not Been Achieved.
 The 2010 Fourth Quarter QMR demonstrates that the objectives of the 2009 RAP
 have not been met for Petitioners' Property.

First, the stated purpose of the 2009 RAP was "to effectively remediate non-source TCE areas" on the Petitioners' Property. (*See* Murray Decl., Ex. D 2009 RAP, Section 6.0). The purpose of the RAP has not been achieved because the TCE on Petitioners' Property has not been effectively remediated. Although the active remediation activities
 completed at the source area of the Renco Property over the past 20 years have apparently
 been successful in significantly reducing concentration of chlorinated hydrocarbons in soil
 and groundwater located at the Renco Property, these remediation efforts have not reduced
 TCE concentrations in groundwater to generally accepted remediation requirements on
 Petitioners' Property. (See Murray Decl., Ex. B.)

7 Second, the 2009 RAP anticipated "similar results in successfully reducing CVOC concentrations in similar timeframes on [Petitioners' Property] as were observed on the 8 Renco site." (See Murray Decl., Ex. D 2009 RAP, Section 6.3.3.) This has not occurred. 9 Arcadis conducted enhanced reductive dechlorination remediation injections at the Renco 10 Property in at least four separate injection sequences. (See Murray Decl., Ex. B.) Arcadis 11 conducted only one enhanced reductive dechlorination remediation injection sequence on 12 13 Petitioners' Property. (See id.) As a result, Arcadis has achieved substantially reduced TCE and vinyl chloride concentrations in groundwater at the Renco Property as compared 14 to those at Petitioners' Property. TCE and vinyl chloride concentrations at Petitioners' 15 Property are much higher than the concentrations that reportedly remain at the Renco 16 Property as the result of the increased active remediation efforts Renco has made on its 17 property. (See id.) 18

19 Third, the 2009 RAP proposed groundwater monitoring following the injections, the results of which "will be used to verify the onset of complete reductive dechlorination of 20 TCE through intermediate transformation products (cis-1,2-dichloroethene [cDCE] and 21 vinyl chloride [VC] to ethane and ethane." (Id. at Section 7.0.) The results of the 22 monitoring were also to "be used to confirm development of a sufficiently anaerobic 23 environment with an acceptable range of pH to support optimal dechlorination." (Id.) 24 Renco and Arcadis have not verified the onset of complete reductive dechlorination of 25 TCE on the Petitioners' Property, and optimal dechlorination has not been achieved. (See 26 Murray Decl., Ex. B.) In fact, the remediation undertaken by Renco has significantly 27

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Allen Matkins Leck Gamble Mallory & Natsis LLP increased the risk of vinyl chloride vapor intrusion into buildings on Petitioners' Property.
 (See id.)

Finally, the 2009 RAP further stated that following the injections in October 3 through November 2010. Arcadis "will report on the need for and feasibility of conducting 4 any additional injections." (Id. at Section 8.0.) (See Murray Decl., Ex. B.) Arcadis' 5 March 7, 2009 letter takes the position that "no further remedial action (i.e., no substrate 6 injection) is required based upon current data". (Murray Decl., Ex. C.) This is asserted 7 even though Arcadis itself states that existing elevated concentrations "are not expected to 8 diminish significantly in the near future (years)" and in fact it may take "a decade or 9 more". (Id.) Thus, Arcadis concedes that, without further active remediation, 10 concentrations of TCE and vinyl chloride will likely remain elevated on Petitioners' 11 12 Properties. (See id.)

This is not acceptable; monitored natural attenuation is not appropriate for
Petitioners' Property at this time. Although monitored natural attenuation may be
appropriate for the Renco Property source area, where several episodes of active
groundwater remediation have historically been completed, a monitored natural attenuation
remediation approach at Petitioners' Property will not result in the required reduction of
chlorinated hydrocarbons-containing groundwater in a reasonable amount of time;
"decades" is not reasonable. (See Murray Decl., Ex. B.)

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2. Further Investigation and Remediation are Necessary for Petitioners' Property.

The Regional Board acted prematurely in concurring with Renco and Arcadis to transition this groundwater remediation project from one requiring active remediation to a monitored attenuation approach, at least with respect to Petitioners' Property. Based on the elevated TCE concentrations in groundwater at Petitioners' Property, natural attenuation of TCE-containing groundwater is not an acceptable remedial approach. (*See* Murray Decl., Ex. B.) Overall, the data indicate that reductive dechlorination is occurring in the area, but is incomplete. (*See id.*)

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Therefore, additional injections on Petitioners' Property are necessary to accelerate
 the rate of reductive dechlorination in order to achieve – at a minimum – levels on
 Petitioners' Property that are comparable to those currently existing on the Renco Property
 within a reasonable timeframe. Related to this additional active remediation, quarterly
 sampling should be continued, at least on Petitioners' Property, to ensure that the injections
 are working and that remediation is proceeding apace.

Finally, the rising levels of vinyl chloride on Petitioners' Property indicate the
immediate need for Renco and Arcadis to evaluate and quantify the potential for vapor
intrusion into the buildings located on Petitioners' Property. Without such investigation,
there is the potential for adverse human health effects, which has not been adequately
characterized or addressed.

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3. The Regional Board's May 13 Action Fails to Protect Water Quality.

Pursuant to Water Code section 13000:

... [T]he people of the state have a primary interest in the conservation, control, and utilization of the water resources of the state, and that the quality of all the waters of the state shall be protected for use and enjoyment by the people of the state.

... [A]ctivities and factors which may affect the quality of the waters of the state shall be regulated to attain the highest water quality which is reasonable, considering all demands being made and to be made on those waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible.

Water Code section 13001 makes the coordination and control of water quality the primary responsibility of the State Board and each Regional Board. Here, the failure of the Regional Board to direct further active remediation and investigation and its apparent concurrence in the May 13 Action with Arcadis' position that remediation is complete and monitored natural attenuation is recommended, is directly at odds with the current data and the Regional Board's mandate to protect water quality. (*See id.*.) Accordingly, the May 13 Action was improper and inappropriate.

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1 IV. CONCLUSION.

The Regional Board's May 13 Action was inappropriate and improper because it
supports reduced monitoring and endorses a remediation method that is insufficient to
remediate-Petitioners' Property. Petitioners-respectfully-request, pursuant to-Water-Codesection 13320 and California Code of Regulations, Title 23, section 2050 *et seq.*, that the
State Board direct the Regional Board to:

- For Petitioners' Property, reinstate the frequency of monitoring in the prior version of Monitoring and Reporting Program No. R3-2005-0143;
- Order Renco and Arcadis to evaluate and quantify the potential for vapor intrusion into the buildings located on Petitioners' Property; and
- (3) Order Renco and Arcadis to conduct additional remediation, including further substrate injections, on Petitioners' Property until the TCE and vinyl chloride concentrations on Petitioners' Property are reduced to concentrations. at or below those observed on the Renco Property.

Petitioners further request a hearing before the State Board to present the arguments
contained herein and evidence attached hereto. Petitioners were not provided with an
opportunity for such a hearing before the Regional Board prior to the May 13 Action.
Dated: June 10, 2011
ALLEN MATKINS LECK GAMBLE

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP SCOTT J. LEIPZIG EMILY L. MURRAY

By: /s/ Emily L. Murray

EMILY L. MURRAY Attorneys for Petitioners

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1 I. INTRODUCTION.

This Petition is from a decision by a Regional Water Quality Control Board to 2 endorse natural attenuation, without further active remediation, and a reduction in the 3 frequency of monitoring from quarterly to annually, for a site where current levels of TCE 4 in groundwater are as high as 3,300 micrograms per liter (ug/l), and vinyl chloride 5 concentrations are as high as 1,900 ug/l. As set forth herein, these levels of contamination 6 are unacceptably high, and further investigation and remediation of the site are necessary. 7 Petitioners Levon Investments, LLC; Rose Marie Towle, as Trustee of the Rose 8-Marie Towle Revocable Trust; John L. Demourkas, as Trustee of the John L. Demourkas 9 Revocable Trust; John Ridell, as Trustee of the Christina Demourkas 2008 Trust; 10 Stephanie Marie Redding, as Trustee of the Stephanie Marie Redding 2008 Trust; Elisa 11 Ann Redding, as Trustee of the Elisa Ann Redding 2008 Trust; and Wells Fargo Bank, as 12 Trustee of the Jheri Elias Redding 1983 Irrevocable Trust (collectively, "Petitioners")¹ 13 hereby petition the action taken by the Executive Officer of the Regional Water Quality 14 -Control Board, Central Coast Region ("Regional Board") by letter dated May 13, 2011 (the 15-"May 13 Action"), whereby the Regional Board approved a revised Monitoring and 16 Reporting Program No. R3-2005-0143 and endorsed a "monitored attenuation approach" 17 to the remediation of contamination originating from the property located at 26 Coromar 18 Drive, Goleta, California (the "Renco Property"), which property is owned by Respondent 19 Renco Encoders, Inc. ("Renco"). A copy of the Regional Board's May 13, 2011 Action is 20 attached as Exhibit A to the Declaration of Emily L. Murray ("Murray Decl.") submitted 21 22 herewith.

Petitioners are the owners of property located at 147-165 Castilian Drive in Goleta,
California ("Petitioners' Property"), which is adjacent to and hydrogeologically
downgradient from the Renco Property. Contamination originating from the Renco
Property has impacted Petitioners' Property. As set forth in a letter dated June 10, 2011

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¹ Petitioners may be contacted through the address, telephone number, and email address of counsel, provided on the caption of this petition.

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from Petitioners' consultant, Padre Associates, Inc. ("Padre"), to the Regional Board,
 concentrations of TCE and vinyl chloride remain very high on Petitioners' Property – much
 Thigher than remaining concentrations on the Renco Property. (See Murray Decl., Ex. B.)
 It is Padre's opinion that the TCE and vinyl chloride contamination on Petitioners'
 Property has not been effectively remediated, and-that further investigation and
 remediation of Petitioners' Property is necessary, even if not necessary for the Renco
 Property. (See id.)

8 Upon information and belief, Renco and their consultant Arcadis U.S., Inc.
9 ("Arcadis"), formerly LFR/Levine Fricke, provided information regarding the current
10 status of remediation of the Renco Property and Petitioners' Property to the Regional
11 Board in a meeting on January 5, 2011 and by letter dated March 7, 2011. (*See* Murray
12 Decl., Ex. C, March 7, 2011 letter from Arcadis to the Regional Board, with enclosures.)
13 Petitioners were not invited to or made aware of the January 5, 2011 meeting, nor were
14 Petitioners provided with the March 7, 2011 letter until after the May 13 Action.

-In apparent reliance on the information provided by Renco and Arcadis in the 15 January 5, 2011 meeting and March 7, 2011 letter, the Regional Board sent a letter to 16 Arcadis dated May 13, 2011, which purported to "confirm[] our ... agreement to revise 17 existing Monitoring and Reporting Program No. R3-2005-0143 (MRP)." (See Murray 18 Decl., Ex. A.) The approved revisions to Monitoring and Reporting Program No. R3-19 2005-0143 include reduced frequency of monitoring (quarterly to annually) and removal of 20 some monitoring wells. The Regional Board's May 13, 2011 letter further stated that 21 "[d]ecreasing water concentrations and the success of the source zone remediation support 22 ... a monitored attenuation approach." (See id.) 23

As set forth herein, Petitioners allege that Arcadis – who on information and belief has a financial stake in obtaining "closure" of the Renco Property from the Regional Board – failed to clearly present to the Regional Board relevant information regarding the current status of contamination on Petitioners' Property. In fact, TCE and vinyl chloride contamination levels remain high, and in the case of vinyl chloride are rising, on

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Petitioners' Property, suggesting the need not only for monitoring to continue on
 Petitioners' Property at a quarterly rate, but also for additional investigation and
 remediation on Petitioners' Property. (See Murray Decl., Ex. B.) Therefore, the Regional
 Board's May 13 Action was inappropriate and improper, and Petitioners are aggrieved,
 because the May 13 Action supports reduced monitoring and-endorses a remediation
 method that is insufficient to remediate Petitioners' Property. (See id.)

Petitioners therefore request, pursuant to Water Code-section 13320 and California
Code of Regulations, Title 23, section 2050 *et seq.*, that the State Water Resources Control
Board ("State Board") direct the Regional Board to revise its May 13 Action as follows:

- At least for Petitioners' Property, reinstate the frequency of monitoring in the prior version of Monitoring and Reporting Program No. R3-2005-0143;
- (2) Order Renco and Arcadis to evaluate and quantify the potential for vapor intrusion into the buildings located on Petitioners' Property; and
- (3) Order Renco and Arcadis to conduct additional remediation, including further substrate injections, on Petitioners' Property until the TCE and vinyl chloride concentrations on Petitioners' Property are reduced to concentrations at or below those currently observed on the Renco Property.

This Petition is being served upon the Regional Board, counsel for Renco, and
Arcadis simultaneously with service upon the State Board. While all of the information
contained in this Petition has previously been provided to the Regional Board, Petitioners
did not have an opportunity to raise these concerns before the Regional Board prior to the
May 13 Action because Petitioners were not included in the prior communications between
Arcadis and the Regional Board, and Petitioners were not made aware that the May 13
Action would be forthcoming.

25 Petitioners request a hearing before the State Board to present the arguments
26 contained herein and evidence submitted herewith. Petitioners were not provided with an
27 opportunity for such a hearing before the Regional Board prior to the May 13 Action.

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1 **II**.

FACTUAL BACKGROUND.

Renco's Contaminated Property and Contract with LFR/Arcadis. 2 A. Since 1972, a variety of electronics manufacturing business have operated on the 3 Renco Property. Chlorinated solvents were used during these operations, and their 4 disposal resulted in a release of chlorinated solvents to the soil and groundwater 5 underneath the Renco Property. Remediation efforts at the Renco Property and adjacent 6 properties have been ongoing since 1992. (See Murray Decl., Ex. D, Investec Properties 7 Assessment Report and Remedial Action Plan and Substrate Injection Workplan for the 8 9 Renco Encoders Site, June 29, 2009 ("2009 RAP").)

Upon information and belief, Renco and LFR (predecessor to Arcadis) entered into
a Guaranteed Environmental Remediation Agreement or the equivalent, whereby LFR
agreed – for a fixed price – to remediate the Renco Property to closure. In other words,
LFR "stepped into the shoes" of Renco from the perspective of paying for the cleanup and
acting as a "responsible party". Upon information and belief, LFR was subsequently
acquired by Arcadis, and Arcadis and LFR therefore had and have a substantial personal
financial stake in obtaining closure of the Renco Property at the lowest possible cost.

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B. Renco Contaminated Petitioners' Property.

The Renco Property is located upgradient from Petitioners' Property, and
groundwater moves from the Renco Property toward Petitioners' Property under normal
conditions. Thus, as a result of Renco's release of chlorinated solvents into the soil and
groundwater beneath the Renco Property, the contaminants migrated from the Renco
Property to Petitioners' Property, contaminating both the soil and the groundwater beneath
Petitioners' Property with TCE and other chlorinated solvents. (*See, e.g.,* Murray Decl.,
Ex. B.)

In 2006, the Regional Board directed Renco to investigate the extent of
contamination in the soil and groundwater at Petitioners' Property. Renco's investigation
revealed elevated levels of PCE and other chlorinated solvents at Petitioners' Property.
Thereafter, LFR falsely asserted the existence of a "second source" on Petitioners'

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Property, contributing to the contamination. Consequently, the Regional Board ordered 1 Petitioners to investigate the source of the contamination at Petitioners' Property. 2 Following that investigation, on August 27, 2008, the Regional Board concluded that 3 historic operations on Petitioners' Property were not a source of the contamination on -4 Petitioners' Property. (See Murray Decl., Ex. E, Regional Board August 27, 2008 Order.) 5 The Regional Board thereafter admonished LFR/Arcadis for repeatedly attempting to 6 reassert their "second source" argument. (See, e.g., Murray Decl., Ex. F, Regional Board 7 response to 2009 RAP) 8



C. The Regional Board Ordered Renco and Arcadis to Remediate Petitioners' Property.

On August 27, 2008, the Regional Board directed Renco to prepare a corrective 11 action work plan to investigate and remediate the contamination on both the Renco 12Property and Petitioners' Property. (See Murray Decl., Ex. E.) The result was the 2009 13 RAP. (See Murray Decl., Exs. D, F.) The stated purpose of the 2009 RAP was "to 14 effectively remediate non-source TCE areas" on the Petitioners' Property. (See Murray 15 Decl., Ex. D 2009 RAP, Section 6.0) The 2009 RAP proposed to accomplish this 16 remediation through enhanced reductive dechlorination remediation injections: "[T]he 17 proposed substrate injections described [in the RAP] are both appropriately targeted and 18 sufficient in mass" to achieve that objective. (Id.) Arcadis anticipated "similar results in 19 successfully reducing [chlorinated volatile organic compounds ("CVOCs")] concentrations 20in similar timeframes on [Petitioners' Property] as were observed on the Renco site." (Id. 21 at Section 6.3.3.) 22

The 2009 RAP proposed groundwater monitoring following the injections, the
results of which "will be used to verify the onset of complete reductive dechlorination of
TCE through intermediate transformation products (cis-1,2-dichloroethene [cDCE] and
vinyl chloride [VC] to ethane and ethane." (*Id.* at Section 7.0.) The results of the
monitoring were to "be used to confirm development of a sufficiently anaerobic
environment with an acceptable range of pH to support optimal dechlorination." (*Id.*) The

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2009 RAP further stated that following the injections in October through November 2010,
 Arcadis "will report on the need for and feasibility of conducting any additional
 injections." (*Id.* at Section 8.0.)

Renco and Arcadis proceeded to implement the 2009 RAP. Historically, Arcadis
has conducted enhanced reductive dechlorination remediation injections at the Renco
Property in at least four separate injection sequences (September 2001; September 2001April 2003; July-August 2006; and October-November 2010). (See Murray Decl., Ex. B.)
However, in implementing the 2009 RAP, Arcadis conducted only one enhanced reductive
dechlorination remediation injection sequence on Petitioners' Property (October-November 10).
(See id.)

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D. 2010 Fourth Quarter Results Show Elevated Levels of Contamination Remain on Petitioners' Property.

As ordered by the Regional Board, Renco and Arcadis monitored the results of 13 implementation of the 2009 RAP. Most recently, on December 14, 2010, Arcadis 14 submitted to the Regional Board the document titled 2010 Fourth Quarter Groundwater 15 Monitoring Report, Renco Encoders Site, 26 Coromar Drive, Goleta, California ("2010 16 Fourth Quarter QMR"). (See Murray Decl., Ex. G, 2010 Fourth Quarter QMR.) This 17 document demonstrated that, while remediation efforts have resulted in improved 18 conditions on the Renco Property, contamination levels on Petitioners' Property remain 19 unacceptably high. (See Murray Decl., Ex. B.) 20

Specifically, as of November 2010, significantly elevated TCE concentrations in
groundwater remain on Petitioners' Property at the locations of groundwater monitoring
well MW-16 (3,300 ug/l), MW-11 (750 ug/l), MW-13 (430 ug/l), MW-14 (230 ug/l), MW15 (160 ug/l), and MW-17 (140 ug/l). (See Murray Decl., Exs. B, G.) All of these
concentrations are well above the Regional Board's applicable remedial action
concentrations and therefore require further active remedial efforts. (See Murray Decl.,
Ex. B.)

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In addition, the remediation activities have not resulted in the complete degradation 1 of TCE, which in-turn has resulted in elevated concentrations of vinyl chloride at 2 Petitioners' Property. Vinyl chloride concentrations have in fact increased significantly at 3 the locations of several wells: MW-11 (from 370 to 1,900 ug/l); MW-16 (from 7.9 to 46 4 ug/l); and MW-17 (from 0.79 to 110 ug/l). (See-Murray Decl., Exs. B, G.) These wells all 5 are located outside the southeast corner of the building located at 147-153 Castilian Drive 6 on Petitioners' Property. The extent of increased vinyl chloride concentration underlying 7 the building and maximum-concentrations are currently unknown-at this area of 8-Petitioners' Property. (See Murray Decl., Ex. B.) 9

Thus, the 2010 Fourth Quarter QMR demonstrates that (1) TCE concentrations in
groundwater on Petitioners' Property remain unacceptably high – in one case 3,300
micrograms per liter (ug/l); and (2) concentrations of vinyl chloride are presently as high
as 1,900 ug/l and are on the rise, as a result of TCE degradation, with unknown
concentrations in some areas.

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E. Arcadis' Misleading Communications with the Regional Board in January and March 2011.

Despite the data described above, contained in their own 2010 Fourth Quarter 17 QMR, Arcadis sought in the early part of 2011 to convince the Regional Board that 18 remediation efforts are complete, no further active remediation is necessary, and reduced 19 monitoring is acceptable. Arcadis did so by focusing on the improved conditions on the 20 Renco Property and burying the information regarding the alarming conditions on 21 Petitioners' Property. Arcadis met with the Regional Board in a meeting on January 5, 22 2011 and sent a follow-up letter on March 7, 2011. (See Murray Decl., Ex. C.) Tellingly, 23 Arcadis did not invite Petitioners to the January 5, 2011 meeting, nor copy them on the 24 March 7, 2011 letter until after the May 13 Action. 25

Specifically, Arcadis' March 7, 2009 letter states that: "Remediation of the original
area of release at the Renco Site is essentially complete. The source area of the Renco site
has been effectively remediated". (See Murray Decl., Ex. C, emphasis added.) However,

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1	no such conclusions are offered with regard to Petitioners' Property (also referred to as the
2	Investec property). Instead, Arcadis obliquely suggests that it was not able to achieve
3	lower concentrations-on Petitioners' Property due to "access issues":
4	-Freatment was conducted in accordance with the work plan
5	and public right-of-ways limit the ability-to-directly achieve lower concentrations in those areas through the approved active remedial
6	technology (i.e., direct injection).
7	(See Murray-Decl., Ex. C.) Likewise, Arcadis acknowledges that " less is known
8	regarding the vapor pathway [from the underlying groundwater] on [Petitioners'
9	Property]." (See id.)
10	Arcadis' March 7, 2009 letter is perhaps more notable for what it does not state:
11	• It does not state that Petitioners' Property has been effectively
12	remediated;
13	• It does not report that the CVOC concentrations on Petitioners' Property
14	have been reduced to the levels observed on the Renco Property;
15	• It does not evaluate the potential vapor intrusion issues that could result
16	from the increased vinyl chloride levels on Petitioners' Property;
17	• It does not state that Renco has achieved complete reductive
18	dechlorination of TCE or that optimal dechlorination has been achieved
19	on Petitioners' Property; and
20	• It does not report on the need for and feasibility of conducting any
21	additional injections required to achieve effective remediation.
22	Nevertheless, despite these omissions, and despite the data in the 2010 Fourth
23	Quarter QMR, the Arcadis' March 7, 2009 letter concludes that (1) "[n]atural attenuation
24	will address residual concentrations to achieve water quality objectives over a
25	reasonable timeframe, which may span a decade or more"; (2) "no further remedial action
26	(i.e., no substrate injection) is required based upon current data"; and (3) a reduced
27	monitoring program is appropriate. (See id.)
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F. The Regional Board's May 13 Action.

In apparent reliance on the information provided by Renco and Arcadis in Arcadis' 2 March 7, 2009 letter, the Regional Board sent a letter to Arcadis_dated May 13, 2011, 3 which purported to "confirm[-our ... agreement to revise existing Monitoring and 4 Reporting Program No. R3-2005-0143 (MRP)." (See Murray Deel., Ex. A.) The approved 5 revisions to Monitoring and Reporting Program No. R3-2005-0143 included reduced 6 frequency of monitoring (quarterly to annually) and removal of some monitoring wells. 7 The Regional Board's May 13, 2011 letter further stated that "[d]ecreasing water 8. 9 concentrations and the success of the source zone remediation support ... a monitored attenuation approach." (See id.) In short, the Regional Board appears to have agreed with 10 Renco and Arcadis that monitored natural attenuation is appropriate, no further active 11 12 remediation is necessary, and reduced monitoring is acceptable. For the reasons set forth herein, this May 13 Action was inappropriate and improper. 13

- 14 **III. ARGUMENT.**
- 15

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A. Standard for State Board Petition.

Any person who is aggrieved by an action, or a failure to act, by a Regional Water 16 Quality Control Board may file a petition for review with the State Board. (See Water 17 Code § 13320; 23 Cal. Code Regs. §§ 2050-2068.)² Subject to petition are "any action or 18 failure to act by a regional board under subdivision (c) of Section 13225, Article 4 19 (commencing with Section 13260) of Chapter 4, Chapter 5 (commencing with Section 20 13300), Chapter 5.5 (commencing with Section 13370), Chapter 5.9 (commencing with 21 Section 13399.25), or Chapter 7 (commencing with Section 13500)...." (Water Code 22 § 13320.) Here, the May 13 Action of the Regional Board was taken pursuant to, inter 23 alia, Water Code section 13267. (See Murray Decl., Ex. A.) 24

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Petitions must be brought within 30 days; here, the Regional Board action was taken on May 13, 2011; the petition was served by email without exhibits on Friday, June 10, 2011, and by overnight mail with exhibits for delivery on Monday, June 13, 2011. (See 23 Cal. Code Regs. § 2050(b).)

A petition must provide a "full and complete statement of the reasons the action or 1 failure to act was inappropriate or improper" and "[t]he manner in which the petitioner is 2 aggrieved." (23 Cal. Code Regs. § 2050(a).) The State Board may find that the action of 3 the Regional Board, or the failure of the Regional Board to act, was appropriate and 4 proper, or inappropriate or improper. (See Water Code § 13320(c); 23 Cal. Code Regs. 5 § 2052.) Upon finding that the action of the Regional Board, or the failure of the Regional 6 Board-to-act, was inappropriate or improper, the state board may direct that the appropriate 7 action be taken by the Regional-Board, refer the matter to any other state agency having 8 jurisdiction, take the appropriate action itself, or take any combination of those actions. 9 (See id.) In taking any such action, the State Board is vested with all the powers of the 10 11 Regional Board. (See id.)

Before taking final action, the State Board may, in its discretion, hold a hearing for
the purpose of oral argument or receipt of additional evidence or both. (23 Cal. Code
Regs. § 2052.)

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B. The May 13 Action was Inappropriate and Improper.

The May 13 Action by the Regional Board was inappropriate and improper because
the objectives of the 2009 RAP have not been achieved and because significantly elevated
concentrations of TCE and vinyl chloride remain on Petitioner's Property. Further
investigation and active remediation is indicated and necessary. The Regional Board's
apparent agreement that active remediation is not required is not consistent with the
current status of Petitioners' Property nor the Regional Board's mandate to protect water
quality. (See Water Code § 13000.)

23

1. The Objectives of the 2009 RAP Have Not Been Achieved.

The 2010 Fourth Quarter QMR demonstrates that the objectives of the 2009 RAP have not been met for Petitioners' Property.

26First, the stated purpose of the 2009 RAP was "to effectively remediate non-source27TCE areas" on the Petitioners' Property. (See Murray Decl., Ex. D 2009 RAP, Section

28 6.0). The purpose of the RAP has not been achieved because the TCE on Petitioners'

Property has not been effectively remediated. Although the active remediation activities
 completed at the source area of the Renco Property over the-past 20 years have apparently
 been successful in significantly reducing concentration of chlorinated-hydrocarbons in soil
 and groundwater located at the Renco Property, these-remediation efforts have not reduced
 TCE concentrations-in-groundwater to generally accepted remediation-requirements-on
 Petitioners' Property. (See Murray Decl., Ex. B.)-

Second, the 2009 RAP anticipated "similar results in successfully reducing CVOC 7 concentrations in similar timeframes on [Petitioners' Property] as were observed on the 8 9 Renco site." (See Murray Decl., Ex. D 2009 RAP, Section 6.3.3.) This has not occurred. Arcadis-conducted enhanced reductive dechlorination remediation injections at the Renco 10 Property in at least four separate injection sequences. (See Murray Decl., Ex. B.) Arcadis 11 conducted only one enhanced reductive dechlorination remediation injection sequence on 12 Petitioners' Property. (See id.) As a result, Arcadis has achieved substantially reduced 13 14 TCE and vinyl chloride concentrations in groundwater at the Renco Property as compared 15 to those at Petitioners' Property. TCE and vinyl chloride concentrations at Petitioners' Property are much higher than the concentrations that reportedly remain at the Renco 16 Property as the result of the increased active remediation efforts Renco has made on its 17 18 property. (See id.)

19 Third, the 2009 RAP proposed groundwater monitoring following the injections, the results of which "will be used to verify the onset of complete reductive dechlorination of 20 21 TCE through intermediate transformation products (cis-1,2-dichloroethene [cDCE] and vinyl chloride [VC] to ethane and ethane." (Id. at Section 7.0.) The results of the 22 monitoring were also to "be used to confirm development of a sufficiently anaerobic 23 environment with an acceptable range of pH to support optimal dechlorination." (Id.) 24 Renco and Arcadis have not verified the onset of complete reductive dechlorination of 25 26 TCE on the Petitioners' Property, and optimal dechlorination has not been achieved. (See 27 Murray Decl., Ex. B.) In fact, the remediation undertaken by Renco has significantly

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increased the risk of vinyl chloride vapor intrusion into buildings on Petitioners' Property.
 (See id.)

Finally, the 2009 RAP further stated that following the injections in October 3 through November 2010, Arcadis "will report on the need-for-and feasibility of conducting 4 any additional injections." (Id. at Section 8.0.) (See Murray Decl., Ex. B.) Arcadis' 5 March 7, 2009 letter takes the position that "no further remedial action (i.e., no substrate 6 injection) is required based upon current data". (Murray Decl., Ex. C.) This is asserted -7 even though Arcadis itself states that existing elevated concentrations "are not expected to 8 diminish significantly in the near future (years)" and in fact it may take "a decade or 9 more". (Id.) Thus, Arcadis concedes that, without further active remediation, 10 concentrations of TCE and vinyl chloride will likely remain elevated on Petitioners' 11 Properties. (See id.) 12

This is not acceptable; monitored natural attenuation is not appropriate for
Petitioners' Property at this time. Although monitored natural attenuation may be
appropriate for the Renco Property source area, where several episodes of active
groundwater remediation have historically been completed, a monitored natural attenuation
remediation approach at Petitioners' Property will not result in the required reduction of
chlorinated hydrocarbons-containing groundwater in a reasonable amount of time;
"decades" is not reasonable. (*See* Murray Decl., Ex. B.)

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2. Further Investigation and Remediation are Necessary for Petitioners' Property.

The Regional Board acted prematurely in concurring with Renco and Arcadis to transition this groundwater remediation project from one requiring active remediation to a monitored attenuation approach, at least with respect to Petitioners' Property. Based on the elevated TCE concentrations in groundwater at Petitioners' Property, natural attenuation of TCE-containing groundwater is not an acceptable remedial approach. (*See* Murray Decl., Ex. B.) Overall, the data indicate that reductive dechlorination is occurring in the area, but is incomplete. (*See id.*)

Therefore, additional injections on Petitioners' Property are necessary to accelerate 1 the rate of reductive dechlorination in order to achieve – at a minimum – levels on 2 Petitioners' Property that are comparable to those currently existing on the Renco Property 3 within a reasonable timeframe. Related to this additional active remediation, quarterly 4 -sampling should be continued, at least on Petitioners' Property, to ensure that the injections--5are working and that remediation is proceeding apace. 6 Finally, the rising levels of vinyl chloride on Petitioners' Property indicate the 7 immediate need for Renco and Arcadis to evaluate and quantify the potential for vapor 8. 9 intrusion into the buildings located on Petitioners' Property. Without such investigation, there is the potential for adverse human health effects, which has not been adequately 10 characterized or addressed. 11 The Regional Board's May 13 Action Fails to Protect Water 12 3. **Ouality**. 13 Pursuant to Water Code section 13000: 14 ... [T]he people of the state have a primary interest in the 15 conservation, control, and utilization of the water resources of the state, and that the quality of all the waters of the state shall 16 be protected for use and enjoyment by the people of the state. 17 ... [A] ctivities and factors which may affect the quality of the waters of the state shall be regulated to attain the highest water 18 quality which is reasonable, considering all demands being made and to be made on those waters and the total values 19 involved, beneficial and detrimental, economic and social, tangible and intangible. 20 Water Code section 13001 makes the coordination and control of water quality the 21 primary responsibility of the State Board and each Regional Board. Here, the failure of the 22 Regional Board to direct further active remediation and investigation and its apparent 23 concurrence in the May 13 Action with Arcadis' position that remediation is complete and 24 monitored natural attenuation is recommended, is directly at odds with the current data and 25 the Regional Board's mandate to protect water quality. (See id.) Accordingly, the May 13 26 27 Action was improper and inappropriate.

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1 IV. CONCLUSION.

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Alien Matkins Leck Gamble Mallory & Natsis LLP

The Regional Board's May 13 Action was inappropriate and improper because it
supports reduced monitoring and endorses a remediation method that is insufficient to
remediate Petitioners' Property. Petitioners respectfully request, pursuant to Water Code
section 13320 and California Code of Regulations, Title 23, section 2050 *et seq.*, that the
State Board direct the Regional Board to:

- For Petitioners' Property, reinstate the frequency of monitoring in the prior version of Monitoring and Reporting Program No. R3-2005-0143;
- Order Renco and Arcadis to evaluate and quantify the potential for vapor intrusion into the buildings located on Petitioners' Property; and

(3) Order Renco and Arcadis to conduct additional remediation, including further substrate injections, on Petitioners' Property until the TCE and vinyl chloride concentrations on Petitioners' Property are reduced to concentrations at or below those observed on the Renco Property.

 Petitioners further request a hearing before the State Board to present the arguments
 contained herein and evidence attached hereto. Petitioners were not provided with an
 opportunity for such a hearing before the Regional Board prior to the May 13 Action.
 Dated: June 10, 2011
 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP

-14-

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EMILY L. MURRAY Attorneys for Petitioners

DECLARATION

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7	BEFORE THE	CALIFORNIA
8	STATE WATER RESOU	RCES CONTROL BOARD
9		
10 11	LEVON INVESTMENTS, LLC; ROSE MARIE TOWLE, AS TRUSTEE OF THE ROSE MARIE TOWLE REVOCABLE	DECLARATION OF EMILY L. MURRAY IN SUPPORT OF PETITION CHALLENGING MAY 13, 2011
12	TRUST; JOHN L. DEMOURKAS, AS TRUSTEE OF THE JOHN L.	REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL COAST DECION ADDROVAL OF DEVISIONS
13	JOHN RIDELL, AS TRUSTEE OF THE CHRISTINA ĐEMOURKAS 2008 TRUST;	TO MONITORING AND REPORTING PROGRAM NO. R3-2005-0143 AND
14	STEPHANIE MARIE REDDING, AS TRUSTEE OF THE STEPHANIE MARIE	ENDORSEMENT OF MONITORED ATTENUATION
15	REDDING 2008 TRUST; ELISA ANN REDDING, AS TRUSTEE OF THE ELISA ANN REDDING 2008 TRUST: and	
17	WELLS FARGO BANK, AS TRUSTEE OF THE JHERI ELIAS REDDING 1983 IRREVOCABLE TRUST.	
18		
19	v.	
20	PECIONAL WATER OUALITY	-
21	CONTROL BOARD, CENTRAL COAST REGION,	
22	Respondent.	
23	DENICO ENCODERS INC. and ARCADIS	
24	U.S., INC.,	
25	Real Parties in Interest.	
26_		
27		
28		
Allen Matkins Leck Gamble Mallory & Natsis LLP		
DECLARATION OF EMILY L. MURRAY

I, Emily L. Murray, declare and state as follows:

3 1. I am an attorney at law, duly licensed to practice before all of the courts in the State of California, and a senior counsel in the law firm of Allen Matkins Leck Gamble 4 5 Mallory & Natsis, LLP, counsel for Petitioners Levon Investments, LLC, Rose Marie Towle, as Trustee of the Rose Marie-Towle Revocable Trust; John L. Demourkas, as 6 Trustee of the John L. Demourkas Revocable Trust; John Ridell, as Trustee of the 7 Christina Demourkas 2008 Trust; Stephanie Marie Redding, as Trustee of the Stephanie 8 Marie Redding 2008 Trust; Elisa Ann Redding, as Trustee of the Elisa Ann Redding 2008 9 Trust; and Wells Fargo Bank, as Trustee of the Jheri Elias Redding 1983 Irrevocable Trust 10 (collectively, "Petitioners"). I make this declaration based upon my own personal 11 knowledge, and if called upon to testify as to the contents hereof, I could and would 12 13 competently do so.

Attached hereto as <u>Exhibit A</u>, is a true and correct copy of the letter dated
 May 13, 2011 signed by Harvey Packard for Roger W. Briggs, Executive Officer of the
 Regional Water Quality Control Board, Central Coast Region ("Regional Board"), and
 attachment thereto.

Attached hereto as <u>Exhibit B</u>, is a true and correct copy of the letter dated
 June 10, 2011 from Petitioners' consultant, Padre Associates, Inc. ("Padre"), to the
 Regional Board.

4. Attached hereto as <u>Exhibit C</u>, is a true and correct copy of the letter dated
 March 7, 2011 from Arcadis U.S., Inc. ("Arcadis") to the Regional Board, and attachment
 thereto.

5. Attached hereto as <u>Exhibit D</u>, is a true and correct copy of the Investec
Properties Assessment Report and Remedial Action Plan and Substrate Injection Workplan
for the Renco Encoders Site, dated June 29, 2009 ("2009 RAP").

27 6. Attached hereto as <u>Exhibit E</u>, is a true and correct copy of the Regional
28 Board Order dated August 27, 2008 .

Allen Matkins Leck Gamble Mallory & Natsis LLP

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1	7. Attached hereto as <u>Exhibit F</u> , is a true and correct-copy of the Regional
2	Board response to 2009 RAP, dated July 21, 2009.
3	8. Attached hereto as <u>Exhibit G</u> , is a true and correct copy of the 2010 Fourth
4	Quarter Groundwater Monitoring Report, Renco Encoders Site, 26 Coromar Drive, Goleta,
5	California, dated December 14, 2010 ("2010 Fourth Quarter QMR").
. 6-	I declare under penalty of perjury under the laws of the State of California that the
7	foregoing is true and-correct.
8	Executed this H day of <u>Eell</u> , at Los Angeles, California.
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Allen Matkins Leck Gamble Mallory & Natsis LLP	

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-2-

EXHIBIT A



California Regional Water Quality Control Board

Central Coast Region_

895 Aerovista Place, Suite 101, San Luis Obispo, California 93401-7906 (805) 549-3147 • FAX (805) 543-0397 http://www.waterboards.ca.gov/centralcoast



Edmund G. Brown Jr. *Governor*

Linda S. Adams Acting Secretary for Environmental Protection

May 13, 2011

Mr. Charles Robinson Renco Enceders, Inc. c/o ARCADIS <u>Charles.Robinson@arcadis-us.com</u> 3150 Bristol Street, Suite 250 Costa Mesa, CA 92626

Dear Mr. Robinson:

SITE CLEANUP PROGAM (PCA 2034800): RENCO, 26 COROMAR DRIVE, GOLETA – PROJECT UPDATE MEETING AND REVISED MONITORING AND REPORTING PROGRAM

Central Coast Regional Water Quality Control Board (Water Board) staff received the March 7, 2011 letter regarding our January 5, 2011 meeting for the above-referenced property. This letter confirms our discussions concerning site remedial actions and our agreement to revise existing Monitoring and Reporting Program No. R3-2005-0143 (MRP). Decreasing waste concentrations and the success of the source zone remediation support your requested revisions to the MRP and a monitored attenuation approach.

The revised MRP is attached and effective immediately.

If you have additional questions, please contact <u>Katie Disimone at (805) 542-4638</u> or Sheila Soderberg at (805) 549-3592.

Sincerely,

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Executive Officer

S\Site Cleanup Program\REGULATED SITES\Santa Barbara Co\Goleta\26 Coromar (Renco)\0511concurrance and MRP revision.doc

Attachment: Revised Monitoring and Reporting Program No. R3-2005-0143

cc w/ attachment: Mr. Tim Mullins Renco Encoders, Inc. 26 Coromar Drive Goleta, CA 93117

California Environmental Protection Agency

Recycled Paper

Mr. Robinson

- 2 -

May 13, 2011

Mr. Bruce Tarr Moseley Associates Inc.

111 Castillian Drive Santa Barbara, CA 93117

Mr. Greg Parker 200 East Carrillo Street, Suite 200 Santa Barbara, CA 93101-2144

--cc via email w/ attachment:
Ms. Katie DiSimone, Water Board <u>kdisimone@waterboards.ca.gov</u>
Mr. Tim Limbers, Arcadis, <u>Tim.Limbers@arcadis-us.com</u>
Mr. Aaron Hook, Arcadis, <u>Aaron.Hook@arcadis-us.com</u>
Ms. Kate Sulka, County Fire, <u>Kate.Sulka@sbcfire.com</u>
Mr. Bill Brace, Investec Management; <u>billy@investecre.com</u>
Mr. Mike Kanno, Goleta Water District, <u>mkanno@goletawater.com</u>
Mr. Ryan Zukor, Padre, <u>rzukor@padreinc.com</u>

California Environmental Protection Agency

Recycled Paper

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION

MONITORING AND REPORTING PROGRAM NO. R3-2005-0143 (Revised May 4, 2011)

CONCERNING

RENCO-ENCODERS SITE 26 COROMAR-DRIVE, GOLETA SANTA BARBARA COUNTY

This Monitoring and Reporting Program supercedes and replaces Monitoring and Reporting Program (MRP) No. 01-056, and any previous revisions of MRP R3-2005-0143.

GROUNDWATER MONITORING

Enhanced reductive dechlorination remediation at this property involved injection of emulsified vegetable oil to accelerate natural degradation of chlorinated solvent compounds. The remediation has decreased contaminant contamination such that monitored natural attenuation appears to be appropriate site management at this time. Renco shall monitor for monitored natural attenuation in groundwater as follows:

Groundwater samples shall be collected annually during June of each year from selected groundwater monitoring wells according to the following:

Well	Analysis Type	Analyte/ Parameter
MW-1, TW-1R, MW- 7, MW-10, MW-11, MW-15, MW-16, MW-18, and MW-19	USEPA Method 8260B	Volatile Organic Compounds (VOCs) ¹

¹ The detection limit for individual VOCs shall not exceed 0.5 micrograms per liter (µg/L).

All analyses shall be conducted at a laboratory certified for such analyses by the State Department of Health Services or at laboratories approved by the Executive Officer. Unless otherwise noted, all sampling, sample preservation, and analyses shall be performed in accordance with the latest edition of *Test Methods for Evaluating Solid Waste*, SW-846, United States Environmental Protection Agency, and analyzed as specified herein by the above analytical methods and detection limits indicated.

Depth to groundwater (to 0.01 feet accuracy) shall be measured in each monitoring well before it is purged and/or sampled. Before sampling, each well shall be properly purged -until-measurements_of_the_following_parameters_have_stabilized;_temperature,_pH,

_specific conductance, turbidity, and dissolved oxygen. After purging, groundwater samples-shall be collected and analyzed as listed above. Hydrasleeve (low or no-purge sampling method)-may be used in-lieu of traditional methods described above.

_Renco_shall_abandon_existing_monitoring_wells_that_are_not_a_part_of_this_monitoring_ program in accordance with Santa Barbara-Country Fire-Prevention Division well-permit standards and requirements. A report of well abandonment must be submitted to the -Water Board by July 15, 2011.

REPORTING_SCHEDULE

Renco shall submit monitoring and groundwater sampling reports annually by August 30 of each year. As required by Code of Regulations, Title 23, Division 3, Chapter 30, and Title 27, Division 3, Subdivisions 1 and 2, the responsible parties, or an authorized representative, are required to electronically submit information to the State Water Board's GeoTracker database. Technical report content shall be uploaded in portable data format (pdf) and monitoring data shall be submitted in electronic data format (edf) as described in the above referenced regulations. The reports shall include the following:

- 1. Results of field and laboratory sampling required by this program in tabular form.
- 2. A table with well-completion information, including total depths and screened intervals of each well.
- 3. Scaled maps showing the site and the locations of all monitoring wells.
- 4. Maps showing calculated potentiometric surfaces for each water-bearing zone.
- 5. All previous data in tabular form to allow comparison of historic data.
- 6. An evaluation and interpretation of all available data.
- 7. A discussion of the performance of monitored natural attenuation in stabilizing or decreasing contaminant concentration and plume containment, including any recommended modifications for the program.
- 8. Maps showing VOC analyte concentrations.
- 9. Sampling protocols and field sampling logs.
- 10. Certified laboratory analytical reports, including quality assurance/quality control data for current data.

The Executive Officer may revise or rescind this MRP.

MRP No. R3-2005-0143

-3-

May 13, 2011

These requirements are-made pursuant to the provisions of Section 13267 of the California Water Code. Pursuant to Section 13268 of the Water Code, a violation of a requirement made pursuant to Water Code Section 13267 may subject you to civil liability of up to \$1,000=per_day.

lly signed by Harvey Harvey Harvey Packard, o= Water Quality Con ral Coast Rec Packard email=hpackaro@www.... c=US Date: 2011.05.12 14:44:48 -07'00' Ordered By: May 13, 2011 for Roger-W. Briggs Date-Executive Officer

S:\Site Cleanup Program\REGULATED SITES\Santa Barbara Co\Goleta\26 Coromar (Renco)\M&RP 2005-0143.revised 0511.doc



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EXHIBIT B



June 10, 2011 Project No. 0601-1611

California Regional Water Quality Control Beard Central-Coast Region 895 Aerovista Place, Suite 101 San Luis Obispo, California 93401–

Attention: Ms. Katie Disimone Water Resources Control Engineer

Subject: Response to California Regional Water Quality Control Board, Central Coast Region Letter Dated May 13, 2011 Pertaining to Site Cleanup Program (PCA 2034800) -Renco Encoders Site, 26 Coromar Drive, Goleta, Santa Barbara County, California.

Dear Ms. Disimone:

Padre Associates, Inc. ("Padre"), on behalf of Investec Management Corporation ("Investec"), representing the owners of record of 82 Coromar Drive and 147-153 Castilian Drive (the "Castilian Building") (collectively the "Investec Properties") is providing this letter in response to the May 13, 2011 letter issued by California Regional Water Quality Control Board, Central Coast Region (RWQCB). The May 13, 2011 letter documented discussions between Arcadis and the RWQCB resulting in the modification of groundwater monitoring and reporting the chlorinated hydrocarbon-containing with aroundwater requirements associated contamination plume associated with the Renco facility located at 26 Coromar Drive, Goleta, Santa Barbara County, California ("Renco Site"). Padre's comments are focused on the Investec Properties located hydrogeologically downgradient from, and contaminated by TCE and its derivatives originating upon, the Renco Site. Below, Padre reviews the data applicable to the Investec Properties and requests that the RWQCB require Renco to complete additional actions with respect to the contamination documented at the Investec Properties.

DATA REVIEWED

As a basis for this letter, Padre reviewed the following documents:

- The RWQCB's May 13, 2011 letter;
- The Arcadis document titled 2010 Fourth Quarter Groundwater Monitoring Report, Renco Encoders Site, 26 Coromar Drive, Goleta, California, dated December 14, 2010 (4Q10 QMR);
- The Arcadis March 7, 2011 letter sent to the RWQCB, which includes a summary of the information provided during the January 5, 2011 meeting between Arcadis and the RWQCB (Arcadis March Report); and
- The Arcadis Remedial Action Plan (RAP) dated June 29, 2009, as well as the RWQCB's approval of that RAP dated July 21, 2009.

California Regional Water Quality Control Board June 10, 2011 (0601-1611)

PURPOSE OF THE RAP WAS NOT ACHIEVED

Arcadis' stated purpose in the RAP was "to effectively remediate non-source TCE-areas" on the Invested Properties (RAP Section 6-0). Arcadis stated that "the proposed substrate injections_described_[in_the_RAP]_are_both_appropriately_targeted_and_sufficient_in_mass"_toachieve that objective (Id.). Arcadis anticipated "similar results in successfully reducing CVOC concentrations in similar timeframes-on-the Invested Properties as were observed on the-Renco site" (RAP 6.3.3).

Arcadis_proposed groundwater monitoring=program following the injections, the results ofwhich "will be used=to verify the onset of complete reductive dechlorination of TCE through intermediate transformation products (cis-1,2-dichloroethene-[cDCE] and vinyl chloride [VC] to ethane and ethane" (RAP 7.0). The results of the monitoring were to "be used to confirm development of a sufficiently anaerobic environment with an acceptable range of pH to support optimal dechlorination. Arcadis further stated that following the injections in October-November 2009, Arcadis "will report on the need for, and feasibility of, conducting any additional injections" (RAP 8.0).

The Arcadis March Report was not supplied to Investec or Padre prior to the issuance of the RWQCB's May 13, 2011 letter. Following the issuance of the May 13, 2011 letter, and after a request from Investec did Arcadis supply the information on which the RWQCB's letter was based.

The Arcadis March Report summarizes some of the results of the RAP. It states that "the source area of the Renco site has been effectively remediated". It states that the existing elevated concentrations "are not expected to diminish significantly in the near future (years / decades)." It also states that access issues related to the existing buildings limited the ability to achieve lower concentrations.

The Arcadis March Report includes two statements that are contrary to the RAP and to the data presented. Those are a) "All Remedial Actions are complete" and b) "Natural attenuation anticipated will address residual concentrations".

It is important to note what the Arcadis March Report does not state. It does not state that the Investec Properties contaminated by the release from the Renco Site have been effectively remediated. It does not report that the CVOC concentrations at the Investec Properties were reduced to levels observed at the Renco Site. The Arcadis March Report does not evaluate the potential for vapor intrusion issues that could result from the increased vinyl chloride concentrations resulting from the groundwater remediation activities at the Investec Properties. It does not state that Renco has achieved complete reductive dechlorination of TCE, or that optimal dechlorination has been achieved at the Investec Properties. California Regional Water Quality Control Board June 10, 2011 (0601-1611)



Notably the Arcadis March Report does not discuss the need for conducting any additional injection events required to achieve effective groundwater remediation. The Arcadis March Report does not adequately reflect the objectives of the RAP, or the effectiveness of the remediation program in achieving them. A straight forward comparison between what Arcadis stated it would complete in the RAP and the Arcadis March Report clearly indicates that the Arcadis statement that "All Remedial Actions are complete" is simply not accurate.

Based on our review of the available information, it is Padre's opinion that the objectives of the RAP-have not been achieved because the TCE concentrations in groundwater at the Investec Properties have not been effectively remediated. There has not been sufficient remediation to reduce the CVOC concentrations on the Investec Properties to the levels similar to those observed on the Renco Site, Renco has not verified the onset of complete reductive dechlorination of TCE on the Investec Properties, and optimal dechlorination has not been achieved. Additionally, the remediation activities undertaken by Renco has apparently increased the risk of vinyl chloride vapor intrusion into the Castilian Building.

The RAP targeted achieving reduced CVOC concentrations at the Investec Properties similar to those observed at the Renco Site. The RAP reports that the Renco Site received multiple injections designed to enhance natural attenuation. Renco is clearly aware that CVOC concentrations will not be reduced over a reasonable amount of time through natural attenuation. This point is most clearly made by Arcadis in the RAP, which states: "Under natural conditions, the dissolution of hydrophobic organic compounds (making them available for treatment) is very slow, allowing groundwater plumes to persist for many decades if the dissolution rate cannot be enhanced." (RAP 6.1(4)). There does not appear to have been any documented justification provided to the RWQCB to allow elevated concentrations to exist on the Investec Properties for decades.

It is Padre's opinion that the RWQCB is premature in concurring with the responsible party to transition this groundwater remediation project from one requiring active remediation to a monitored attenuation approach, with respect to the Investec Properties. The apparent path forward for groundwater remediation (monitoring natural attenuation (MNA)) proposed for the Investec Properties is not appropriate at this time. Although MNA may be appropriate for the Renco source area where several episodes of active groundwater remediation have been completed, an MNA remediation approach at the Investec Properties will not result in the required reduction of chlorinated hydrocarbons-containing groundwater in a reasonable amount of time. Arcadis itself states that in the Arcadis March Report that existing elevated concentrations "are not expected to diminish significantly in the near future (years)", and in fact it may require "a decade or more".







PROFESSIONAL OPINIONS BASED ON DATA PRESENTED

Based on the data presented in the cited reports, Padre has the_following_professional opinions:

- Although the active remediation activities completed at the source area of the Renco property over the past 20 years have apparently been successful in significantly reducing concentration of chlorinated hydrocarbons in soil and groundwater-located at the Renco property; these remediation efforts have not reduced-TCE concentrations in groundwater to generally accepted remediation requirements on the Investec Properties. Without further active remediation, concentrations of TCE and vinyl chloride will likely remain elevated under the Castilian Building and elsewhere on the southern half of the Investec Properties.
- Our review of the November 2010 analytical data for groundwater monitoring wells located near Investec's Castilian Drive Building (MW-11, MW-13, MW-14, MW-15, MW-16, and MW-17) indicates that the remediation is not complete. Padre reviewed historical and current groundwater analytical data from Table 2 of the Arcadis 2010 Fourth Quarter Groundwater Monitoring Report. TCE concentrations generally declined and/or remained at relatively the same concentrations in all the above-listed wells from approximately January 2008 (prior to the fall 2009 injections) to November 2010 (following those injections). Significantly elevated TCE concentrations in groundwater remain at the locations of groundwater monitoring well MW-16 (3,300 micrograms per liter (ug/l)), MW-11 (750 ug/l), MW-13 (430 ug/l), MW-14 (230 ug/l), MW-15 (160 ug/l), and MW-17 (140 ug/l). All of these concentrations are well above the RWQCB's applicable remedial action concentrations, which therefore require further active remedial efforts.
- Arcadis has conducted enhanced reductive dechlorination remediation injections at the Renco Site in at least four separate injection sequences, (September 2001, September 2001-April 2003, July and August 2006, and October-November 2009). Arcadis has conducted only one enhanced reductive dechlorination remediation injection sequence on the Investec Properties (October-November 2009). As a result, Arcadis has achieved substantially reduced TCE and vinyl chloride concentrations in groundwater at the Renco Site as compared to those at the Investec Properties. TCE and vinyl chloride concentrations at the Investec Properties are very different than the concentrations that reportedly remain at Renco's property as the result of the increased active remediation efforts Renco has made on its property. Attached as Table 1 is a comparison of the remaining TCE and vinyl chloride concentrations at the two properties.

- 4 -





The remediation activities implemented at the Renco property have not resulted in the complete degradation of TCE, which has resulted in elevated TCE and vinyl chloride concentrations in groundwater at the Castilian Building property. Vinyl chloride concentrations increased significantly at the locations of several wells:=MW-11 (from 370 to 1,900 ug/l); MW-16 (from 7.9 to 46 ug/l); and MW-17 (from 0.79 to 110 ug/l). These wells all are located outside the southeast corner of Castilian Building. The extent of increased vinyl-chloride concentration underlying the building, and maximum concentrations are currently unknown at this area of the Investec Properties.

 Based on the elevated TCE concentrations in groundwater at the Investec Properties, natural attenuation of TCE-containing groundwater is not an acceptable remedial approach. Overall, the data indicate that reductive dechlorination is occurring in the area, but is incomplete.

REQUIREMENTS FOR ADDITIONAL REMEDIATION REQUESTED

Based on the foregoing opinions, the stated purposes of the RAP, and the data presented, Padre, on behalf of Investec and the owners of record of the Investec Properties, respectfully requests that the RWQCB consider requiring Renco to complete the following activities on the Investec Properties:

- Evaluation and quantification of the potential for vapor intrusion into the Castilian Building. This request is based on the elevated vinyl chloride concentrations on the Investec Properties, the fact that the increased concentrations are a direct result of the Arcadis remedial activities, and the fact that Renco/Arcadis have conducted no study of the potential for vapor intrusion on the Investec Properties; and
- Conduct additional injections of the emulsified vegetable oil (EVO) at the Investec Properties until the CVOC concentrations at the Investec Properties are reduced to concentrations at or below those observed on the Renco Site. Due to projected vacancies and anticipated tenant accommodations, the injection events should include injections inside of the Castilian Building at locations approved by the owners of the Castilian Building necessary to reduce elevated CVOC concentrations below that building.

California Regional Water Quality Control Board June 10, 2011 (0601-1611)



Padre Associates, Inc. and Investec Management Corporation appreciate your consideration of this request and look forward to your response. If you have any questions or -require additional information, please contact the undersigned.

Sincerely, PADRE ASSOCIATES, INC. JEROME K. SUMMERLIN EG NO. 1950 CERTIFIED Jerome-K. Summerlin C.E.G., C.Hg. R.E.A. II ENGINEERING GEOLOGIST Principal OF CA Attachment: Table 1

- 6 -

c: Mr. Greg Parker - Investec Management Corporation Mr. Bill Brace - Investec Management Corporation Emily Murray, Esq. - Allen Matkins

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California Regional Water Quality Control Board June 10, 2011 (0601-1611)

Table 1. Comparison of TCE and Vinyl Chloride Concentrations in Groundwater,November 2010 at the Renco-and Investec Sites

(all concentrations in micrograms per liter (µg/l)

	Renco Monitoring W	/ells	In	vestec_Monitoring	Wells
	TCE	VC		TCE	VC
MW-7	3.6 / 7.5	160 / 160	MW-11	750 / 860	1,900 / 1,900
MW-9	8.4	51	-MW-13	-430	-25
TW-1R	18	510	MW-14	230 / 160	4.572.6
			- MVV-15	160	2.2
			MW-16	3,300	46
			MW-17	140	110

N:PROJECT DATA/2006/06-1610/06-1611 LTR.061011.DOC

EXHIBIT C



Ms. Katie DiSimone California Regional Water Quality Control Board Central Coast Region 895 Aerovista Place, Suite 101 San Luis Obispo, California 93401

Subject:

Summary of the January 5, 2011 Meeting Between the Central Coast RWQCB and ARCADIS Regarding the Renco Encoders Site and Transmittal of a Revised Monitoring and Reporting Program, Goleta, California

Dear Ms. DiSimone:

ARCADIS U.S., Inc. (ARCADIS) has prepared this letter to summarize our presentation, discussions, and requests regarding the Renco Encoders, Inc. property (Renco Site) made during the meeting on January 5, 2011 attended by Katie DiSimone and Sheila Soderberg of the California Regional Water Quality Control Board, Central Coast Region (RWQCB) and Tom Johnson, Aaron Hook, and Charles Robinson from ARCADIS, as well as Kurt Beil and Matthew Schnobrich from ARCADIS, who attended by telephone. The purpose of the meeting was to discuss the status of remedial actions completed at the Site to address historical releases of trichloroethylene (TCE), and to ascertain if the RWQCB believed that any additional remedial actions would be required.

The slides we presented in the meeting are attached. These slides summarize the results of site investigations and remedial actions conducted over the past decade under the direction of the RWQCB.

The following is a brief summary of the main points of our discussions and the conclusions from our meeting.

- The horizontal and vertical extent of the affected resource has been well defined:
 - The zone of groundwater contamination is contained within shallow, thin, interbedded and discontinuous strata of generally lower resource value, which is very difficult to remediate;
 - Deeper groundwater zones have not been impacted; and
 - No surface water impacts were found.

Imagine the result

Mar0711 CM008031 Renco 1-5-11 RWQCB-AUS Meeting Summary Ltr.doc

ARCADIS U.S., Inc. 320 Commerce Street Suite.200 Irvine California 92602 Tel-714.730:9052 Fax 714.730.9345 www.arcadis-us.com

ENVIRONMENT SER4

Date: March 7, 2011

Contact: Charles Robinson

Phone: 714.508.2607

Email: charles.robinson@arcadis-us.com_

-Our ref: CM008031.0020

ARCADIS

Ms. Katie DiSimone California Regional Water Quality Control Board Central Coast Region March 7, 2011

 Remediation of the original area of release at the Renco-Site is essentially complete. The source area for the Renco Site has been effectively remediated. Both vadose zone soils and groundwater contain only trace concentrations and continue to demonstrate declining trends.

- Significant mass reduction has been achieved throughout the entire plume.
- Elevated concentrations are still present in limited areas of the plume; however, due to the recent treatment and natural attenuation, these concentrations are declining. These concentrations are not expected to diminish significantly in the near future (years).
- Treatment was conducted in accordance with the work plan approved by the RWQCB staff, but access issues related to buildings and public right-of-ways limit the ability to directly achieve lower concentrations in those areas through the approved active remedial technology (i.e., direct injection).
- All remedial actions are complete and consistent with what has been requested by the RWQCB.
- Substantial expenditures have been made to remediate this site, despite the low resource potential of the groundwater, and we do not believe significant additional expenditures are warranted.
- Work on the Sares Regis property indicates that the indoor air exposure pathway from the underlying groundwater is limited, while less is known regarding the vapor pathway on the Investec property.

Natural attenuation, while not considered a remedial action herein, will address residual concentrations to achieve water quality objectives over a reasonable time frame, which may span a decade or more. Additionally, ARCADIS will perform ongoing monitoring to confirm the continued reductions of concentrations of chlorinated volatile organic compounds (CVOCs) in the affected water at the Renco Site, as may be requested by the RWQCB. The RWQCB concurred that no further remedial action (e.g., no substrate injection) is required based upon current data. Further, the RWQCB would consider a reduced monitoring program to observe the ongoing reduction of CVOCs resulting from both enhanced and natural attenuation processes.

ARCADIS

Ms. Katie DiSimone California Regional Water Quality Control Board Central Coast Region March 7, 2011

> Page: 3/3

For ongoing site-monitoring, the RWQCB also concurred with changing the frequency of the groundwater monitoring program for the Site from-quarterly to annually. The RWQCB also approved our recent request to use the Hydrasleeve (no purge) method for future groundwater sampling efforts. Accordingly, we have attached for your review and approval a proposed modified Monitoring and Reporting Program (MRP) for the Renco Site that reflects these changes.

Please provide concurrence of the meeting contents as discussed in this letter, as well as your approval of the modified MRP.

We again thank you for your attention and assistance with this matter.

Sincerely;

ARCADIS U.S., Inc.

Mr. A.

Charles E. Robinson, P.E. Vice President and Principal Engineer

^{Copies:} Tim Rose, Renco Encoders

Attachments: January 5, 2011 Meeting Slides Monitoring and Reporting Program

Mar0711 CM008031 Renco 1-5-11 RWQCB-AUS Meeting Summary Ltr.doc

Renco – Project Status Meeting Central Coast Regional Water Quality Control Board January 5, 2011

G ARCADIS

Agenda

- Introduction
- Review of remedial progress
- Remedial action effectiveness
- Conclusions
- Discussions

GARCADIS

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Presentation Summary

Renco Release Remedial Progress

- Extent of contamination has been defined
- Source area has been remediated
- Significant mass reduction throughout plume
- Continuing reduction in VOC concentrations
- Remedial actions completed
- Natural attenuation anticipated will address residual concentrations

ARCADIS

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Site Characterization Activities- through 2010



ARCADIS

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Site Hydrogeology		
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I/MIP-01		i -
	Vadose Zone: Silts and clays with local sand interbeds	al tine
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10:		
	Upper Interbedded: saturated, fine-gra fluvial deposit, 12 to 14 feet thick	rained
Contraction of the second of t	 shallow, thin, interbedded strata with coarse- sand 3 to 5+ feet thick- apparent transmissiv across site. 	e-grained sive zone
		-
-15 - Lower aquitard	Lower Aquitard: laterally continuous cl silty clay, 2 to 6 feet thick. Confining uni underlying strata	clay and hit for
(jei) 10 10 12 B 40 C 200 12 B 40 C 200 C	l attachaddad: fillia arainad fluivia	
	deposits, unknown thickness. No VOC r detected in this deeper strata	ar Mass
		9
G ARCADIS		

Elevation (feet above datum)





Remedial Activities (2001 – 2006)

GARCADIS

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Conclusions

- Horizontal and vertical extent of contamination has been well defined
- Affected zone contained within shallow, thin, interbedded strata- lower value resource
- Deeper zone not impacted
- No surface water impacts
- Source area remediated soil and groundwater
- Significant mass reduction throughout plume
- Continuing reduction in VOC concentrations caused by injected carbon substrate
- Remedial Actions Completed
- Natural attenuation will address residual concentrations

ARCADIS

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EXHIBIT D

Investec Properties Assessment Report and Remedial Action Plan and Substrate Injection Workplan for the Renco Encoders Site 82 Coromar Drive and 147-165 Castilian Drive Goleta, California

> June 29, 2009 002-08031-20

Prepared For: California Regional Water Quality Control Board Central Coast Region 895 Aerovista Place, Suite 101 San Luis Obispo, California 93401

> Prepared By LFR an ARCADIS Company 301 S. Miller Street, Suite 210 Santa Maria, California 93454
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All hydrogeologic and geologic conclusions and recommendations in this document have been prepared under the supervision of and reviewed by an-LFR Inc. California Professional Geologist.

TIMOTHY L. LIMBER No: 6926 Exo 11/30/10 June 29, 2009 FOAD Timothy L. Limber Date Principal Hydrogeologist

All engineering information, conclusions, and recommendations in this document have been prepared under the supervision of and reviewed by an LFR Inc. California Professional Engineer.

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1.0 INTRODUCTION

In accordance with the Third Remedial-Action Plan (RAP) Amendment dated November 14, 2008, LFR Inc. (LFR) submits this Investec Properties Assessment Report and Remedial Action Plan and Substrate Injection Workplan for the Renco Encoders (Renco) property located at 26 Coromar-Drive, Goleta, California ("the Site"). The Third RAP Amendment addresses chlorinated volatile organic compounds (CVOCs)-in-groundwater on and downgradient from the adjacent Investec Real Estate Companies (Investec) properties located at 82 Coromar Drive and 147-165 Castilian Drive (Figures 1 and 2) (collectively referred to as "the Investec Properties"). In their letter to LFR dated February 13, 2009, the California-Regional Water Quality-Control Board, Central Coast-Region (RWQCB) conditionally-approved the Third RAP Amendment Updated Scope of Work for the Renco facility, dated January 15, 2009.

In response to comments provided by Investec regarding site access limitations, the RWQCB reduced LFR's proposed scope of investigation and again limited further proposed characterization efforts on the Investec Properties. Reducing LFR's proposed further site investigations of the Investec Properties limits our ability to determine the effects of any source(s) on remedial efforts. To address this issue, the RWQCB's conditional approval dated February 13, 2009 stipulated that, should remedial efforts similar to those successfully implemented at the adjacent Renco Site fail to remediate groundwater on the Investec Properties, such failure may suggest the presence of a source at the Investec Properties. In that case, the RWQCB indicated that it would then look to Investec to implement any needed additional characterization and remedial efforts.

The Third RAP Amendment also proposed groundwater assessment activities downgradient from the Investec Properties to assess the extent of CVOCs in groundwater and to evaluate whether affected groundwater has migrated to and significantly impacted the Goleta Slough or other nearby surface-water bodies. Implementation of the downgradient assessment activities has been delayed largely due to the time required to negotiate property access from two downgradient property owners (Santa Barbara Airport and Sares Regis). As discussed in telephone conversations between LFR and RWQCB representatives on February 23 and June 9, 2009, and as confirmed by email correspondence on May 21, 2009, field work and reporting for downgradient assessment activities on these properties will be completed upon the successful conclusion of access negotiations with both property owners. As agreed by the RWQCB, the results of these subsequent characterization activities and any remedial efforts are scheduled to be presented in an addendum to this report, which will be submitted by August 14, 2009, unless other unforeseen delays occur.

2.0 **OBJECTIVES**

The primary objectives of this RAP and recent remedial assessment activities conducted at the Investec Properties are:

- 1) Further refine the conceptual site model (CSM), and
- 2) Finalize the design of the approved remedial strategy (enhanced reductive dechlorination).

The original objectives of the remedial characterization were modified and limited by the RWOCB's approval of the remedial characterization on February 13, 2009 in response to comments from Investec. As discussed above, additional site investigations have been conducted to further evaluate and validate the CSM. The primary goal was to better define the extent of CVOC-impacted groundwater and sediments to be addressed by remedial efforts. LFR's original scope of work included shallow Membrane Interface Probe (MIP) borings to further evaluate probable additional sources areas on the Investec Properties. This information is needed to confirm or refine the CSM's characterization of potential sources on the Investec Properties for remedial design purposes. Remediation of CVOC source zones is typically more challenging than remediation of the resulting groundwater plumes. This is a result of the greater mass and concentration of contaminant, coupled with the fact that some of the contaminant mass may be in the form of a non-aqueous phase (requiring desorption or dissolution to effect treatment) or diffused into the porewater associated with finegrained sediments (where access becomes diffusion limited). In response to Investec's objections, the RWQCB reduced the scope of LFR's Site characterization, and the RWQCB has indicated that Investec would be responsible for characterization and remediation of source zones on the Investec Properties. The presence of any such additional source zones on the Investec Properties would be indicated by persistent elevated CVOC concentrations or repeated rebound of CVOC concentrations in groundwater following implementation of LFR's proposed remedial efforts on the Investec Properties.

3.0 PREVIOUS REMEDIAL ACTIVITIES

Multiple investigations and remedial efforts to evaluate volatile organic compound (VOC) impacts to soil and groundwater on the Renco Site and the Investec Properties have been implemented by LFR and previous consultants as well as Investec's consultants. A timeline and summary of some of these activities is presented below.

1992. Hoover & Associates, Inc., excavated approximately 13 tons of soil during removal of the former pH neutralization sump on the north side of the Renco Encoders Building.

February 2001. On February 13, 2001, LFR submitted to the RWQCB a RAP to address soil and groundwater concerns related to a reported release of chlorinated solvents at the Renco facility. The RAP included a three-phase approach for remediation of dissolved-phase VOCs in groundwater using enhanced reductive dechlorination, and the installation and operation of a soil vapor extraction (SVE)... system to remove residual chlorinated-solvents from impacted soil beneath and adjacent to-the current-building on the Renco Site. Available data at that time suggested that the groundwater plume extended onto the Investec Properties and terminated on the downgradient-boundary of those properties.

September 2001. Following additional characterization efforts, LFR implemented the initial phase of groundwater remediation activities, which involved the subsurface injection of Hydrogen Release Compound (HRC®) on the Renco Site and portions of the Investec Properties located downgradient of the Renco Site. Injection locations in the initial phase of remediation are shown on Figure 3. While groundwater analytical results following injection showed some reductions in VOC concentrations on the Renco Site and the Investec Properties, the observed reductions were less substantial than had been anticipated, with moderate-reductions observed on the Renco Site and little to no reductions on the Investec Properties. Based on this information, LFR evaluated and considered other products and application strategies for potential use in subsequent subsurface injections.

February 2002 – June 2004. LFR operated a soil-vapor extraction and treatment system (SVETS) to remove VOCs from shallow soil and soil vapor beneath and immediately surrounding the Renco building, where the Renco TCE release was known to have originated. The SVETS operated continuously from February 2002 through July 2002, and in pulse mode from August 2002 through June 2004. The combined continuous and pulse-mode operation of the SVETS was effective in removing VOC mass. A total of 355 pounds of VOC mass was estimated to have been removed during the operation of the SVETS.

A soil closure investigation was conducted in September 2006. Results of the investigation indicated that only low concentrations of TCE remained in soil and soil gas along the northern and eastern perimeter of the Renco building, all below RAP remedial objectives. In May 2007, under the regulation of the Santa Barbara County Fire Department and as directed by the RWQCB, LFR converted the SVE wells into a sub-slab depressurization system to mitigate soil vapor and address possible concerns associated with residual VOCs in the subsurface. The Santa Barbara County Fire Prevention Division (FPD) recommended closure for soil issues at the Site in December 2007 and issued a deed restriction for the property that was recorded with Santa Barbara County on December 21, 2007. The Soil Management Plan (SMP) was conditionally approved by the FPD in a letter to LFR dated October 3, 2008. Modifications to the SMP were submitted on December 5, 2008. The FPD has recommended closure of soil-related issues at the Renco Site to the RWQCB; any RWQCB response is still pending.

September 2002 – April 2003. With the RWQCB's concurrence, LFR conducted a pilot study that included injection of three different enhanced in-situ bioremediation substrate products (HRC-X[®] [a more concentrated version of HRC[®]], WILClear[™], and LactOil),-all of which furthered the RWQCB directive to remediate the groundwater plume. The purpose of the pilot study was to evaluate and compare the relative effectiveness of these products for the design of a subsequent application of substrate. -Based on the results of the pilot study, LFR observed that each of the tested alternative products (food-grade materials) successfully reduced VOCs through enhanced reductive dechlorination at the Site, suggesting latitude in the selection of reductive-reagents. In addition, as a result of elevated TCE concentrations on the downgradient boundary of the Investec Properties, which were significantly higher than identified by the available data to devise the RAP, LFR selected the reagent HRC-X[®] for injection as a treatment barrier fence to address VOCs flowing in groundwater. In accordance with the RAP, a 425-foot long HRC-X[®] treatment fence was installed in January 2004 at a location on the southeast downgradient margin of the Investec Properties (Figure 3).

July and August 2006. Following additional characterization efforts on the Renco Site, and after efforts to gain access to the Investec Properties had been repeatedly rebuffed by Investec representatives, LFR performed an injection of EOS[®] and EHC[™] substrates to enhance anaerobic biodegradation of VOCs in groundwater beneath portions of the Renco Site, with no similar remedial injection on the Investec Properties as a result of the access impasse. EHC[™], a more viscous and concentrated substrate which also included zero-valent iron, was injected in the "hot spot" areas of the Renco Site surrounding the former pH neutralization sump and surrounding the hazardous materials storage area to potentially address more resilient concentrations that resultedfrom the original TCE release. EOS[®], a thin and less viscous material, was injected along the northern perimeter of the building on the Renco Site and in the area between monitoring wells MW-9 and MW-7 (Figure 3). Laboratory results and chemical parameters measured since injection indicate that these injection activities were performed in a similar manner, and both successfully reduced VOC concentrations in groundwater beneath the Renco Site and in the immediate downgradient area (LFR 2007a).

4.0 MARCH 2009 FIELD INVESTIGATION

This section describes the remedial assessment activities conducted on the Investec Properties by LFR in March 2009.

4.1 **Pre-Field** Activities

A site-specific Health and Safety Plan (HSP) was prepared in accordance with Occupational Safety and Health Administration (OSHA) regulations, as specified in Title 29 of the Code of Federal Regulations (CFR), Section 1910-120, and as specified by LFR's corporate health and safety program. The HSP outlines potential hazards associated with performing field work, as well as the measures to be taken to minimize risks associated with these hazards.

USA Dig Alert was notified 48 hours prior to sampling activities. LFR also used a private underground utility locating service to check for any unmarked utilities on the properties. To further protect against potential damage to underground utilities, all borings were hand cleared to a minimum depth of 5 feet below ground surface (bgs).

4.2 Cone-Penetrometer Test and MIP Investigation – March 2009

An overview of the cone penetrometer test (CPT) and MIP investigation methods used –at the Site is presented in the following sections.

4.2.1 CPT/MIP Approach and Application

The combination of CPT and MIP with electrical conductivity provides continuous high resolution data for geology and non-specific CVOCs in-situ. Combining the lithology data with MIP data provides a powerful tool for refining the CSM based on the occurrence and relative concentrations of constituents of concern within the observed hydrostratigraphic framework.

CPT logs are useful in assessing soil types and textural changes in vertical sequence to define the hydrostratigraphic framework for groundwater flow and potential pathways of contaminant transport. CPT logs can be used to correlate stratigraphic facies from one boring location to another. Log patterns can be interpreted with regard to the occurrence of vertical sequences of depositional environments and sedimentary facies. Characteristic upward-coarsening, upward-fining or variable texture patterns of aggradational, progradational, and lateral accretion bedding geometries can be recognized using these data (Galloway and Hobday 1983).

The MIP device contains a semi-permeable membrane that is heated, promoting diffusion of VOCs across the membrane and into an inert carrier gas that travels to up-hole gas-phase detectors. The MIP device has three gas-phase detectors: a photoionization detector (PID), a flame-ionization detector (FID), and an electron capture detector (ECD). Each gas-phase detector responds differently to the presence of VOCs; however, all of the detectors are non-specific to individual compounds and provide qualitative, screening-level data. The FID and PID are best suited for detecting straight-chained and aromatic hydrocarbons, respectively, and the ECD is best suited for detecting CVOCs.

4.2.2 CPT/MIP Investigation Field Methods

LFR retained the services of Gregg Drilling and Testing of Signal Hill, California, to conduct the CPT investigation on March 25, 2009. The MIP investigation was conducted by Vironex of Santa Ana, California, from March 25 to March 27, 2009.

Borings for the CPT/MIP investigation were advanced at seven locations on the Investec Properties, as shown on Figure 2. The CPT/MIP investigation included the following:

- Three MIP borings were advanced to a depth of approximately 15 feet bgs using a direct-push rig. Two borings were-located northwest of the Investec building at 147-155 Castilian Drive (Investec Remedial Assessment [IRA]/MIP1 and IRA/MIP2); the third boring-was located west of the structure (IRA/MIP3).
- Three collocated CPT and MIP borings were advanced to depths of 30 to 35 feet bgs surrounding the Investec building at 147-155 Castilian Drive. One boring was located north of the building near the former underground storage tank (IRA/MIP4), one boring was located southeast of the building (IRA/MIP6), and one boring was located east of the building (IRA/MIP7).
- One MIP boring was advanced to a depth of 35 feet bgs south of the structure (IRA/MIP5). A CPT boring was not advanced at this location due to the 10-foot lateral setbacks required for the 16-inch diameter subsurface high-pressure natural gas pipeline that parallels Hollister Avenue south of the structure.

The CPT tool was advanced using lengths of 1.75-inch diameter rods and a 20-ton CPT direct-push rig. Following completion of each CPT logging effort, the rods were retrieved from the borehole, the boring was backfilled using hydrated bentonite chips, and the surface was completed to original conditions.

The MIP tool was advanced using a standard 1.75-inch-diameter rods and a Geoprobe® 6600 direct-push rig. Before the probe was advanced, the tubing that houses the carrier gas and conductivity cable was connected to the MIP tool and strung through the probe rods. The probe was then pushed to depth at the rate of approximately 1 foot per minute and measurements of conductivity were continuously recorded along with the ECD, PID, and FID readings. Following completion of each MIP log, the rods were retrieved from the borehole, the boring was backfilled using hydrated bentonite chips, and the surface was completed to original conditions.

4.2.3 Confirmation Sampling and Analysis

The CPT and MIP logs from each boring were evaluated to identify specific zones for subsequent soil and groundwater sampling. Samples were collected from additional direct-push borings advanced adjacent to the CPT/MIP boring. Sample boring locations were advanced adjacent to MIP locations IRA/MIP4 through IRA/MIP7, and a total of seven soil samples and nine groundwater samples were collected. These samples were used to quantify CVOC concentrations at the various targeted depths. Soil and grab groundwater samples were collected using a Geoprobe® 6600 direct-push rig operated by Vironex, under the direction of LFR.

Soil samples were retrieved from acetate sleeves liners placed inside the direct-push rods. The portions of the cores retained for laboratory analysis were-cut and then capped with Teflon liners and plastic caps. Labels containing the boring number,

sample identification number and depth, project number, sampler name, and time and date of allocation were attached to each sample. The soil samples were stored in an icechilled cooler pending delivery to the analytical laboratory. Following sample collection, the borings were backfilled using hydrated bentonite chips, and the surface was completed to match original ground surface conditions.

Grab groundwater samples were collected_using two different methods. The majority of the samples were collected using a hydraulically driven, temporary piezometer consisting of a hollow rod assembly with a 5-foot-long stainless steel screen attached at the leading end of the assembly (Hydropunch®). The piezometer was advanced to the desired depth interval-based upon the CPT- or EC-derived lithology and the ECD responses. At the -targeted depths, the rod assembly was retracted to raise the outer piezometer sleeve, exposing the screen and allowing groundwater to pass through the screen into the piezometer. Polyethylene tubing with a check valve was threaded down the rods, and inertial motion was used to draw groundwater into the tubing for the collection of groundwater samples. The groundwater was then transferred from the tubing directly into preserved laboratory-provided bottles; the bottles were capped and labeled; and the groundwater samples were stored in an ice-chilled cooler pending delivery to the analytical laboratory. At four locations where the inertial motion method did not produce a sufficient volume of water for analysis, temporary wells were constructed of perforated polyvinyl chloride (PVC) pipe. Samples were collected from each well using a new, disposable bailer and decanted directly into preserved laboratory-provided bottles; the bottles were capped and labeled; and the groundwater samples were stored in an ice-chilled cooler pending delivery to the analytical laboratory.

The groundwater and soil samples were transported via courier under chain-of-custody protocol to Oilfield Environmental Compliance of Santa Maria, California, a state-certified laboratory. The samples were analyzed under standard turn-around time for VOCs using U.S. Environmental Protection Agency (EPA) Method 8260B.

4.3 Investigation-Derived Waste

Soil cuttings from the soil borings and sample waste water were stored on the Renco Site in new 55-gallon stainless steel drums that were sealed and marked with nonhazardous waste labels. The sample waste water was disposed of with purge water from the first quarter 2009 quarterly monitoring event. One drum of soil cuttings was also temporarily stored on the Renco Site. After completion of the off-site investigation, the contents of the drum will be sampled, profiled, and transported to an appropriate facility for treatment and/or disposal.

5.0 MARCH 2009 CPT/MIP INVESTIGATION RESULTS AND DISCUSSION

Analytical results for groundwater and soil samples from this investigation and previous CPT/MIP investigations conducted on both the Renco Site and the Investec

Properties are summarized in Tables 1 and 2, respectively. The ECD response curves for the seven IRA/MIP borings and corresponding TCE concentrations from soil and groundwater samples are shown on Figure 2. CPT logs for the three CPT-borings are included in Appendix A. Laboratory reports for the confirmatory soil and groundwater samples are included in Appendix B.

5.1 CPT/MIP Results

The CPT and MIP results were examined and compared to previous sampling results in the context of the existing CSM (LFR 2008). Objectives of the investigation were to investigate stratigraphic conditions and contaminant distribution of CVQCs in the stratigraphic units of vadose zone and saturated zone. The CPT and EC logs were used to identify sediment zones, including the upper aquitard, upper interbedded, lower aquitard, and lower interbedded facies. MIP logs were also used to investigate whether contaminant mass was present in the vadose zone and saturated zone. Soil samples were also collected from the various facies and submitted for analysis.

The CPT and EC logs from the March 2009 investigation were consistent with previous results for the seven locations. Figure 4 is a stratigraphic cross section (Cross Section A-A') prepared based on hydrostratigraphic facies interpreted from both recent and previous CPT data. The datum for the cross section is a laterally continuous sand lens within the upper interbedded facies that occurs at approximately 20 feet bgs (datum sand lens). This cross-section was revised from a previous cross-section A-A' (Figure 8, LFR 2008) by adding downgradient borings IRA/MIP4 and IRA/MIP6 to provide additional data along the axis of the CVOC plume.

MIP curves for the ECD response were analyzed for IRA/MIP1 through IRA/MIP7. MIP survey ECD response profiles from the newly installed and previous investigation test locations show the following:

- Data from IRA/MIP1 to IRA/MIP3 indicate that the vadose zone in the upgradient portions of the Investec Properties is not affected by CVOCs and, as such, remedial efforts in the vadose zone are not warranted for that area.
- CVOC contaminants are primarily limited to the upper interbedded facies at the Site (see Figure 4).
- On the former Renco Site and Investec Properties where previous remedial substrate injections have occurred, the ECD response from the MIP logs shows that CVOCs, where present, generally are occur only in the lower portion of the upper interbedded facies, below the datum sand lens, and decrease rapidly with depth toward the lower aquitard facies.
- In areas where remedial substrate injections have been conducted, a more uniform profile of relatively low CVOC concentrations is observed within the upper interbedded facies (IRA/MIP3, IRA/MIP4, and IRA/MIP7).

• A notable exception is the IRA/MIP4 location, where elevated CVQC concentrations were found in shallow groundwater (see-Section 5.1.1); this-appears indicative of a potential source area on the Invester Properties._

5.2 Revised Conceptual Site Model

The results of-the_remedial assessment activities conducted on the Investec Propertiesare in general agreement with the existing CSM (LFR 2008). Four hydrostratigraphic facies have been identified beneath the vadose zone: 1) upper-aquitard facies, 2) upper interbedded facies, 3) lower aquitard facies, and 4) lower interbedded facies. These facies_represent a fluvial system related to the regional drainage system and topography.

The upper aquitard facies is a thin (approximately 2 feet thick) but laterally continuous silty clay layer that occurs at or below 10 feet bgs. The upper interbedded facies extends from the base of the upper aquitard facies to approximately 30 feet bgs. Sediments of this facies consist predominately of silt and clayey silt with interbedded, fluvial deposited, fine-grained sand lenses. The sand lenses are generally thin (less than 3 feet thick) and elongated (up to 1,000 feet), with a northwest-southeast orientation consistent with the regional drainage direction. These thin, elongated sand lenses generally pinch out laterally over short distances (less than 300 feet in a northeast-southwest orientation). At the base of the upper interbedded facies, a laterally continuous fine-grained layer (lower aquitard facies) occurs between approximately 30 to 35 feet bgs; this layer apparently functions as a barrier to deeper vertical transport of contaminant mass. Beneath the lower aquitard is the lower interbedded facies.

Figure 4 is a stratigraphic cross section (Cross Section A-A') prepared based on hydrostratigraphic facies interpreted from newly collected and previous CPT data. The datum for the cross section is a somewhat laterally continuous sand lens within the upper interbedded facies that occurs at approximately 20 feet bgs (datum sand lens). This cross-section was revised from a previous cross-section A-A' (Figure 8, LFR 2008) by adding downgradient borings IRA/MIP4 and IRA/MIP6 to provide additional data along the axis of the CVOC plume.

Sand lenses within the upper interbedded facies (and in particular the datum sand lens on Cross Section A-A') appear to be preferential pathways for groundwater and contaminant mass transport; however, the lateral extent of these sand lenses is also limited by the depositional environment. Limited diffusion of contaminant mass into fine-grained soils adjacent to the sand lenses appears to have occurred as well.

6.0 **REMEDIAL INJECTION WORKPLAN**

LFR's conceptual remedial approach for CVOCs in groundwater at the Investec Properties and possible downgradient areas was approved by the RWQCB in a letter to LFR and Investec dated December 10, 2008 (RWQCB 2008). This approach involves the use of enhanced reductive dechlorination (ERD), which the RWQCB has approved in three previous work plans as part of the RAP for the Site. This remedial injection workplan is an addendum to that RAP.

The assessment results described above further defined the geologic strata beneath the Investec Properties, as well as the nature-and-distribution-of-chemical constituents in the subsurface, and enabled the development of the following injection strategy for -enhanced reductive dechlorination of affected groundwater. Based upon the effective remedial experience on the Renco Site, LFR anticipates that the proposed substrate injections described herein are both appropriately targeted and sufficient in mass to effectively remediate non-source TCE areas in the observed water quality-within-the observed geochemical context. Source zones that appear to be present on the Invested Properties may require subsequent characterization and reagent application, as did the Renco source zones. In accordance with the directives from the RWQCB, and the RWQCB's characterization of future enforcement orientation, LFR is proceeding with remedial efforts to address CVOC releases from the Renco Site, as well as CVOCs on the downgradient Invester Properties (see Figure 5), even though this downgradient contamination appears to originate primarily from the Investec Properties. LFR will submit an addendum to this report to provide similar analysis and design approach, if warranted, for the Airport and Sares Regis properties.

In addition to the efforts on the Investec Properties, LFR is recommending an additional limited application at the Renco Site to address an apparent source zone that the prior substrate injection appears to have diminished, but not to concentrations observed in the other non-source zones on the Renco Site. Monitoring wells MW-9 and TW-1R have CVOC concentrations in excess of 200 parts per billion (ppb) and 1,500 ppb, respectively; these areas appear more resilient and represent apparent historical source zones. Figure 6 depicts the recommended injection locations at the Renco Site.

6.1 Overview of Enhanced Reductive Dechlorination

The anaerobic bioremediation technique known as ERD involves the delivery of a degradable source of organic carbon into the contaminated aquifer to achieve four basic goals:

- 1. Overcome the continuous electron acceptor supply: This includes oxygen, nitrate, and other electron acceptors that tend to support a more aerobic microbial community.
- 2. *Produce molecular hydrogen through fermentation*: Molecular hydrogen is a product of fermentation and is used as an electron donor by dechlorinating bacteria.

3. Achieve complete dechlorination of the target contaminants: Dechlorinating bacteria_use_the hydrogen produced through fermentation as an electron donor and the chlorinated alkenes or alkanes as electron acceptors. Hydrogen atoms are substituted for chlorine atoms in the dehalorespiration process, resulting in a step-wise chemical reduction of the chlorinated solvent or other halogenated --organic_compounds, which for PCE and TCE follows_the pathway:

PCE \rightarrow TCE \rightarrow cis-DCE \rightarrow VC \rightarrow Ethene

4. Achieve dissolution of nonaqueous phase contaminant-mass: Under natural conditions, the dissolution of hydrophobic organic compounds (making them available for treatment) is very slow, allowing-groundwater plumes to persist for many decades if the dissolution rate cannot be enhanced. With ERD, dissolution enhancement is achieved through a variety of mechanisms.

6.2 Substrate Selection

The RAP and subsequent RAP Amendments for the Renco Site concluded that subsurface injection of commercial carbon substrates to enhance rates of anaerobic CVOC biodegradation was the most feasible approach for groundwater remediation (LFR 2005b, 2006). Multiple phases of injection, using several different commercial products (HRC[®], HRC-X[®], lactate, EOS[®], and EHC[™]) have been previously conducted on both the Renco Site and the Investec Properties. Historical injection areas are shown on Figure 3.

The most recent phase of groundwater remediation occurred in July-August 2006, when emulsified oil substrate EOS[®] and EHC[™] reagents were injected into the subsurface on the Renco Site, north and east of the main building. EOS[®] was injected in downgradient, non-source zones and EHC[™] was injected in suspected source zones. Quarterly monitoring results for the Renco Site have shown substantial decreases in TCE concentrations since the 2006 injections, particularly in the downgradient areas of the property. During the most recent event (March 2009) TCE concentrations were at or near the lowest concentrations on record for most on-site wells (LFR 2009) and were below remedial action goals in most monitoring wells on the Renco Site.

The successful results in downgradient areas of the Renco Site have been primarily attributed to the effects of EOS[®] and EHC[™] injections (LFR 2009). Portions of the CVOC plume under the Investec Properties have been attributed to historical releases from the Renco facility, and the assessment activities described above have also indicated that EOS[®] (an emulsified vegetable oil product) has been effective in reducing TCE concentrations in the apparent transmissive sandy layer (datum sand layer) that appears to be contiguous between the properties. Vegetable oils are insoluble in water and so must be emulsified to form micron-size droplets to support their delivery and distribution in an aquifer. The oils are comprised of triglycerides that slowly undergo hydrolysis to release soluble glycerol and long-chain fatty acids that are anaerobically fermented to hydrogen and organic acids (e.g., acetate). This provides a slow, steady—

supply-of organic carbon that can fuel reductive dechlorination over a period of two to three years. Some commercially available oil substrates (e.g., EOS®) also include __lactate (a source of more readily degradable carbon), nutrients, and/or buffering agents -to further enhance the stimulation of subsurface microbes.

Emulsified vegetable oil (EVO) was-previously approved by the RWQCB (2005, 2006) =for use at the Renco Site. In addition, the previously implemented pilot study of different substrates indicated that all substrates tested successfully enhanced reductive dechlorination-processes. In accordance with the RWQCB approved RAP and RAP addendums, and based on its documented success on the Renco Site, LFR proposes to use an EVO substrate (EOS® 598 B42, RNASTM or SRSTM; see www.terrasystems.net for documentation and verification)-to support enhanced reductive chlorination on the Investee Properties.

6.3 Injection Program Design

A summary of the proposed-emulsified oil-injection program is-presented in the following sections. This includes the basis for determining the injection network configuration, an initial estimate of the injection volume and oil loading, information regarding the field verification test, and the full-scale application.

6.3.1 Injection Network Configuration

The proposed injection locations on the Investec Properties were selected based on the distribution of CVOCs detected in groundwater-monitoring wells on the Investec Properties. Based on these data, the area of affected groundwater was estimated to be approximately 175,000 square feet (Figure 5). As observed during the MIP ECD investigation, the depth interval of CVOC-affected groundwater varies across the Investec Properties:

- In the upgradient portions of the Investec Properties, the affected groundwater interval extends from approximately 25 to 30 feet bgs.
- In the middle portions of the Investec Properties, in the vicinity of the apparent Investec source(s), and further south near assessment location IRA/MIP5, the affected groundwater interval extends from approximately 15 to 30 feet bgs.
- In the vicinity of location IRA/MIP4, the affected groundwater interval extends from the base of the vadose zone (approximately 13 feet bgs) to approximately 30 feet bgs.
- In the downgradient portion of the Investec Properties, to the southeast and east, the affected groundwater interval was determined to be approximately 24 to 29 feet bgs.

A grid of injection locations (Figure 5) was developed based on the distribution outlined above. As depicted, it is anticipated that the injection points will be spaced approximately 25 feet apart (on center) to provide perpendicular coverage across the accessible areas of the plume. The vertical intervals over which the injections will take place were then selected based on the impacted horizon observed during the MIP ECD investigation.

Figure 6 shows the proposed injection locations on-the-Renco Site based upon the observed concentrations from the March 2009 monitoring event.

6.3.2 Proposed Injection Volume and Substrate Loading Calculations

Appendix C contains the design parameters that provide the rationale and estimations for the selected EVO-application design. An estimation of the electron demand of the observed water quality is performed as well as oil retention methodology to evaluate whether both an adequate mass of substrate and coverage of substrate are achieved in the application.

As reflected in the Electron Demand Approach estimation calculations, based upon the distribution and quantity of affected groundwater, LFR estimates that a minimum of 679 gallons of EVO would be required to create the reductive environment required to facilitate the biological destruction of the observed CVOCs.

As reflected in the Oil Retention Approach estimation calculations in Appendix C, the primary factor that typically controls EVO loading is retention of the oil on the aquifer sediments during injection (ESTCP 2006). As an oil-in-water emulsion is injected, the droplets interact with sediment surfaces and adhere. The sediment surfaces gradually become coated with a layer of oil that provides a carbon source for reductive dechlorination, typically without significantly affecting the permeability of the formation. As shown in the calculation estimates, assuming approximately 75 percent of the average 5-foot application zone would prove receptive to substrate injection (we believe that this is a conservative over estimation) and a distance of 25 feet between injection locations, and using literature values for mobile porosity and oil retention, approximately 7,072 gallons of EVO substrate need to be injected. This equates to approximately 23 gallons per transmissive foot, at a water:EVO dilution ratio of 15:1, to provide the necessary coverage on the accessible portions of the Investec Properties. Figure 5 shows the distribution and number of injection locations.

Concentrated EVO will be mixed with municipal supply water from the City of Goleta to create the dilute injection solution. Mixing will occur via portable equipment and will be distributed to the injection point(s) through a metering manifold. Vironex's standard operating procedures for emulsified oil substrate injection are presented in Appendix D. Additional temporary monitoring points (screened across the same monitoring interval) for sampling during the test injection may be installed to evaluate the effectiveness of the injection efforts, as deemed necessary in the field.

As shown on Figure 6, the proposed Renco injection consists of twenty-five injection locations, with twenty-two locations planned for three 5-foot injection intervals and three locations planned for four 5-foot injection intervals. The injection rates and

dilutions will be implemented as described above for the Investec applications, with a total volume of EVO substrate estimated at 1,860 gallons.

6.3.3 Full-Scale Injection

Conceptually, a total of 157 injection locations are proposed on the Investee Properties to distribute the $EOS^{\textcircled{}}$ (Figure 5). These injection locations are distributed across the Investee Properties, as summarized=below:

- nine injections in the vicinity of the apparent Investec_source zone, with 20 feet of injection length
- 60 injections of 15-foot injection length, generally in the mid-property area, with a denser application along the property boundary downgradient of the Investec building
- 88 injections of 5-foot injection length on the remainder of the property, with a denser application on the down gradient boundary

Subject to potential modifications based upon field observations and constraints, for each 5-foot injection interval, it is anticipated that approximately 23 gallons of EVO will be mixed with 350 gallons of water to create approximately 370 gallons of a 1:15 dilute solution. Based on the number of 5-foot injection intervals currently planned, a total of approximately 106,100 gallons of dilute EVO solution is estimated to be injected into the shallow aquifer underlying the Investec Properties.

The Renco application will address the location believed to be the immediate vicinity of the historical TCE release location that continues to maintain elevated concentrations of CVOCs. As shown on Figure 6, EVO injections are planned at twenty-five locations with a total of eighty 5-foot injection intervals. Similar injection volumes and dilutions are anticipated for the Renco injections as outlined above for the Investec injections.

Based upon our experience at Renco and other similar facilities, we anticipate that initial displacement of groundwater during injection will be primarily upward, creating a temporary mound which will quickly equilibrate after the injection is complete. The potential for significant lateral displacement of contaminants through possible preferential flow pathways will be limited by the precautions being taken in injection management, as well as by injecting relatively low volumes at each point. The last Renco injection rate was 10 gallons per minute (gpm); the proposed applications have been reduced to 3 gpm to diminish the potential for formation fracturing and to increase the likelihood of EVO placement into the identified more transmissive and affected zones. Fluid displacement during substrate injection does not transport significant amount of contaminant mass because, in nearly all settings, most of the contaminant mass is stationary (sorbed on soil particles).

Based on the historical CVOC concentrations observed at both the Renco Site and the Investec Properties, LFR anticipates similar results in successfully reducing CVOC concentrations in similar timeframes on the Investec Properties as were observed on the

Renco Site. As discussed above, some areas in the Investec Properties appear to contain historical sources which could typically prove more resilient and persistent than non-source zones. The presence of any such additional source zones on the Investec Properties would be indicated by persistent elevated CVOC concentrations or repeated rebound of CVOC concentrations in groundwater following implementation of LFR's proposed remedial efforts on-the Investec Properties. The RWQCB has acknowledged that remediation of any such additional sources is not the responsibility of LFR or Renco.

7.0 PROPOSED GROUNDWATER MONITORING ACTIVITIES

In order to evaluate the efficacy of the above remedial injection program, the following remedial process groundwater monitoring plan is proposed. Groundwater monitoring at the Investec Properties is not currently included as part of the groundwater monitoring plan for the Renco Site. LFR proposes initial quarterly groundwater sample collection from monitoring wells MW-10, MW-11, MW-12, MW-13, MW-14, MW-16, MW-17, and MW-18 (Figure 3). Laboratory groundwater sample analyses will include VOCs, methane, ethane, and ethene using passive diffusion bag (PDB) sampling methodology. Pertinent field-measured parameters will include total organic carbon (TOC), pH, specific conductivity, oxidation-reduction potential (ORP), and dissolved oxygen (DO). Additional parameters that may be considered for supplemental analysis include volatile fatty acids, other electron acceptors or their reduced byproducts (nitrate, sulfate, dissolved iron), chloride, or other parameters that might support the performance evaluation.

Prior to initiating the remediation program, a baseline sampling event will involve analysis of all the parameters noted above (including the supplemental parameters), plus alkalinity. Following one year of quarterly monitoring, the monitoring frequency will be reduced to semi-annual in the second year. Reduction in the number of wells to be sampled will be considered after the first two sampling events, as appropriate.

The results from the VOC and light hydrocarbon analyses (ethane and ethene) will be used to verify the onset of complete reductive dechlorination of TCE through intermediate transformation products (cis-1,2-dichloroethene [cDCE] and vinyl chloride [VC]) to ethane and ethene. As the biotransformation of CVOCs continues, overall trends will be evaluated to determine remedial progress. The methane and pH results will be used to confirm development of a sufficiently anaerobic environment within an acceptable range of pH to support optimal dechlorination. TOC results will be used to evaluate longevity of the substrate and confirm the availability of sufficient degradable organic carbon to support the process.

8.0 PROPOSED SCHEDULE

Following approval of this proposed remedial injection workplan, LFR will immediately begin planning and scheduling with representatives from the Investec Properties. LFR anticipates that substrate injections will commence in August or September 2009. LFR-also-anticipates that remaining downgradient assessment activities will be completed in July 2009, and that a downgradient assessment report will be submitted in August 2009, unless unforeseen delays are encountered. LFR would like to consolidate all injection efforts into one mobilization, and will report on the need for and feasibility of conducting any additional injections on the remaining downgradient properties.

9.0 LIMITATIONS STATEMENT

The opinions and recommendations presented in this report are based upon the scope of services, information obtained through the performance of the services, and the schedule as agreed upon by LFR and the party for whom this report was originally prepared. This report is an instrument of professional service and was prepared in accordance with the generally accepted standards and level of skill and care under similar conditions and circumstances established by the environmental consulting industry. No representation, warranty or guarantee, express or implied, is intended or given. To the extent that LFR relied upon any information prepared by other parties not under contract to LFR, LFR makes no representation as to the accuracy or completeness of such information. This report is expressly for the sole and exclusive use of the party for whom this report was originally prepared for a particular purpose. Only the party for whom this report was originally prepared and/or other specifically named parties have the right to make use of and rely upon this report. Reuse of this report or any portion thereof for other than its intended purpose, or if modified, or if used by third parties, shall be at the user's sole risk.

Results of any investigations or testing and any findings presented in this report apply solely to conditions existing at the time when LFR's investigative work was performed. It must be recognized that any such investigative or testing activities are inherently limited and do not represent a conclusive or complete characterization. Conditions in other parts of the Site may vary from those at the locations where data were collected. LFR's ability to interpret investigation results is related to the availability of the data and the extent of the investigation activities. As such, 100 percent confidence in environmental investigation conclusions cannot reasonably be achieved.

LFR, therefore, does not provide any guarantees, certifications, or warranties regarding any conclusions regarding environmental contamination of any such property. Furthermore, nothing contained in this document shall relieve any other party of its responsibility to abide by contract documents and applicable laws, codes, regulations or standards.

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TABLES

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Table 1 Summary of Hydropunch Groundyvaler Sample Results Renco-livester Remedial Assessment LFR 002-09031-20/004

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Table 2 Summary of Historic Soli Analytical Results, Investec Properties Rendo-Investec Remdal Assessment LFR 0/2-08031-20/04

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--|--|--|--|
| (mg/kg) | | 11 | I | 1

 | I | 1 | 1

 | | ¢10 | 7 | 1

 | | 1

 | 1 | 1 | 1 | I | 1

 | 1 | I
 | 1

 | 1 | 1 | I | ŀ

 | 1 | I | 1 |

 | I | 1 | 1 | 1 | I
 | 1 | 1
 | I | I | 1 | 1 .1 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | 1 | 1 | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | -

 | <0.002 | <0.002 | 0.00203.0 | <0.002 | <0.002
 | <0.002 | <0.002
 | <0.002 | <0.002 | <0.002 | U.004000 |
| (mg/kg) | _ | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0,0050 | <0:0050

 | | <u> </u> | <u>ا</u> ر. | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.002 | <0.002 | <0.002 | <0.002 | <0.002
 | <0.002 | <0.002
 | <0.002 | <0.002 | <0.002
0.002 | |
| (mg/kg) | 1 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | 1 | - | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | <0.005 | <0.005
 | <0.005 | <0.005 | 40.005
20010 | 20,005
20,005 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | |
 |
I | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.015 | <0.015 | <0.015 | <0.015 | <0.015
 | <0.015 | <0.015
 | <0.015 | <0,015 | <0.015 | <0.015 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | - | ŀ. | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | <0.005 | <0,005
 | <0.005 | <0.005 | <0.05
5 25 7 | <0.00
200.02 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | I | 1 | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
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 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | ×0.005 | <0.005
 | <0.005 | <0,005 | <0.005 | <0.005 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | - | 1 | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
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 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | 1 | ł | ı | ŀ | ł
 | 4 | ı
 | 1 | I | ı | 4 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | 1 | ١. | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | 0,00929J | 0.0251
 | 0.0108 | <0.005 | <0.005 | <0.005 |
| (mg/kg) | | 0.0066 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | 1 | I | <0.0050

 | <0.0050 | <0.0050

 | 0.012 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | 0.00692J | 0.00586J
 | 0.0786 | 0.0365
 | 0.0197 | 0.005J | 0.0356 | 400.0> |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | ł | 1 | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | <0.005 | <0.005
 | <0.005 | <0.005 | <0.005 | <0.005 |
| (mg/kĝ) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050

 | | | 4 | <0,0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0,005
 | <0.005 | <0.005
 | <0.005 | <0.005 | <0.005 | <0.005 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0,0050 | <0.0050

 | - | | 1 | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | ×0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | <0.005 | <0.005
 | <0.005 | <0.005 | <0,005 | 400.02
200.02 |
| (mg/kg) | | <0.0050 | <0.0050 | <0.0050

 | <0,0050 | <0.0050 | <0.0050

 | | 1 | 1 | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 |

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | <0.005 | <0.005
 | <0.005 | <0.005 | <0.005 | <0.005 |
| (mg/kg) | | 0.0073 | <0.012 | 0.028

 | <0.0050 | <0.0050 | <0.0050

 | | 1 | I | 0.015

 | <0.0050 | 0.010

 | 0.052 | 0.012 | 0.0074 | <0.0050 | <0.0050

 | <0.0050 | 0.012
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | 0.0080 | 0.035 |

 | 0.00873J | <0.005 | 0.00579J | 0.0275 | 0.0266
 | 0.0745 | 0.102
 | 0.114 | 0.0422 | 0.0406 | 0.0443 |
| (mg/kg) | | <0.0050 | <0.0050 | <0,0050

 | <0.0050 | <0.0050 | <0.0050

 | | 1 | ł | <0.0050

 | <0.0050 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0.0050 | <0.0050

 | <0.0050 | <0.0050
 | <0.0050

 | <0.0050 | <0.0050 | <0.0050 | <0,0050

 | <0.0050 | <0,0050 | <0.0050 | *200

 | <0.005 | <0.005 | <0.005 | <0.005 | <0.005
 | <0.005 | <0.005
 | <0.005 | <0.005 | <0.005 | <0.005 |
| Date | 99 | 3/27/09 | 80/12/C | 3/27/09

 | 3/27/09 | 3/27/09 | 3/27/09

 | y 2008 | 2/11/08 | 2/11/08 | 2/11/08

 | 2/11/08 | 2/11/08

 | 2/11/08 | 2/12/08 | 2/12/08 | 2/12/08 | 2/12/08

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 | 2/12/08 | 2/13/08 | 2/13/08 | 2/13/08

 | 2/13/08 | 2/13/08 | 2/13/08 | r & March 2

 | 1/24/07 | 1/24/07 | 1/24/07 | 1/24/07 | 1/24/07
 | 1/24/07 | 1/24/07
 | 1/24/07 | 1/24/07 | 1/24/07 | 3/19/07 |
| (feet bgs) | - March 200 | ωç | 2 10 | 0 00

 | n | 7.5 | 14

 | e)- Februar | 10 | 15 | 10

 | 30 | 10

 | 25 | ŝ | 10 | 10 | 29

 | £ | 10
 | 10

 | 29 | 10 | 25 | 5

 | 10 | 10 | 25 | e)- January

 | 5 | 9 | 9 | 9 | 9
 | 9 | e
 | 9 | 9 | 9 | 90 |
| le ID | Site (LFR) | P-04-6' | P-04-10 | P-05-8'

 | P-06-3' | P-07-7.5 | P-07-14

 | : Site (Padr | - | |

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| Samp | Investec | SS-IRAVM | | SS-IRAM

 | SS-IRAMI | SS-IRAMI | SS-IRA/MI

 | Investec | GP-9-10 | GP-9-15 | GP-10-10

 | GP-10-30 | GP-11-10

 | GP-11-25 | GP-12-5 | GP-12-10 | GP-13-10 | GP-13-29

 | GP-14-5 | GP-14-10
 | GP-15-10

 | GP-15-29 | GP-16-10 | GP-16-25 | GP-17-5

 | GP-17-10 | GP-18-10 | GP-18-25 | Invested

 | SV-3-5 | SV-4-6 | SV-5-6 | SV-6-6 | SV-7-6
 | SV-8-6 | SV-9-3
 | SV-9-6 | SV-10-6 | SV-13-6 | SV-14-6
GP-1-2 |
| | Sample ID (feet bgs) Date (mg/kg) (mg/ | Sample ID (received) Date (mg/kg) (mg/ | Sample ID (rest bgs) Date (mg/kg) (mg/kg) | Sample ID (terbus) Date (mg/kg) (mg/kg) <t< td=""><td>Sample ID (teet bgs) Date (mg/kg) (mg/kg)</td><td>Sample ID (teet bgs) Date (mg/kg) (mg/kg)</td><td>Sample ID (redups) Date (mg/kg) <t< td=""><td>Sample ID (Technic) (mg/kg) (mg/kg)</td><td>Sample ID (rection) Date (mg/kg) <</td><td>Sample ID (reful) Nmarket Component Co</td><td>Sample ID (redups) Date (mg/kg) <t< td=""><td>Sample ID (red bgs) Date (mg/kg) <</td><td>Sample ID (refuge) Date (mg/kg) <t< td=""><td>Sample ID (mg/kg) Turvestee Site (LFR)- March 2009 (mg/kg) (mg/kg)</td><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (med tupe) Date (mg/kg) (mg/kg)</td><td>Sample ID Terreture
(marking) Cample ID Terreture
(marking) <tht< td=""><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID Fuerunt Sample ID Fuerunt Sample ID Fuerunt Fuerunt</td><td>Sample ID (red by) Date (mg/kg) <t< td=""><td>Sample ID (werk by) Dame (mg/kg) (mg/kg)</td><td>Sample ID (mayra) Time Name Time Name</td><td></td><td>Sample ID (nature) $(marka)$ <t< td=""><td>Sample ID (warn) (warn) (mayra) (mayra)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (marka) (marka)</td><td>Sample ID Teruting
Investor Terutinting
Investor Terutintinvestor <t< td=""><td>Sample ID Tenton Tange ID Tenton T</td><td>Sample ID (web kps) Sample ID (web kps) Sample ID (web kps) marks (web kps) (</td><td>Sample (a) Tanker Tan</td><td>Sample ID (advise) (advise)</td><td>Sample D Toolking length Toolking length<!--</td--><td>Sample D Tending Tending</td><td>Sample ID Turbin ID <t< td=""><td>Sample ID Turnishing Amerikan Ameri</td><td>Sample ID (method) ample ID (method) ample ID (method) ample ID (method) (mple) (mple)</td><td>Semanti D (and/m) Samati D (and/m) (and/m)</td><td>Sample II (market) Sample III (market) Sample III (market) Sample III (market) Sample IIII (market) Sample IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII</td></t<></td></td></t<></td></t<></td></t<></td></tht<></td></t<></td></t<></td></t<></td></t<> | Sample ID (teet bgs) Date (mg/kg) (mg/kg) | Sample ID (teet bgs) Date (mg/kg) (mg/kg) | Sample ID (redups) Date (mg/kg) (mg/kg) <t< td=""><td>Sample ID (Technic) (mg/kg) (mg/kg)</td><td>Sample ID (rection) Date (mg/kg) <</td><td>Sample ID (reful) Nmarket Component Co</td><td>Sample ID (redups) Date (mg/kg) <t< td=""><td>Sample ID (red bgs) Date (mg/kg) <</td><td>Sample ID (refuge) Date (mg/kg) <t< td=""><td>Sample ID (mg/kg) Turvestee Site (LFR)- March 2009 (mg/kg) (mg/kg)</td><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (med tupe) Date (mg/kg) (mg/kg)</td><td>Sample ID Terreture
(marking) Cample ID Terreture
(marking) <tht< td=""><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID Fuerunt Sample ID Fuerunt Sample ID Fuerunt Fuerunt</td><td>Sample ID (red by) Date (mg/kg) <t< td=""><td>Sample ID (werk by) Dame (mg/kg) (mg/kg)</td><td>Sample ID (mayra) Time Name Time Name</td><td></td><td>Sample ID (nature) $(marka)$ <t< td=""><td>Sample ID (warn) (warn) (mayra) (mayra)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (marka) (marka)</td><td>Sample ID Teruting
Investor Terutinting
Investor Terutintinvestor <t< td=""><td>Sample ID Tenton Tange ID Tenton T</td><td>Sample ID (web kps) Sample ID (web kps) Sample ID (web kps) marks (web kps) (</td><td>Sample (a) Tanker Tan</td><td>Sample ID (advise) (advise)</td><td>Sample D Toolking length Toolking length<!--</td--><td>Sample D Tending Tending</td><td>Sample ID Turbin ID <t< td=""><td>Sample ID Turnishing Amerikan Ameri</td><td>Sample ID (method) ample ID (method) ample ID (method) ample ID (method) (mple) (mple)</td><td>Semanti D (and/m) Samati D (and/m) (and/m)</td><td>Sample II (market) Sample III (market) Sample III (market) Sample III (market) Sample IIII (market) Sample IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII</td></t<></td></td></t<></td></t<></td></t<></td></tht<></td></t<></td></t<></td></t<> | Sample ID (Technic) (mg/kg) (mg/kg) | Sample ID (rection) Date (mg/kg) < | Sample ID (reful) Nmarket Component Co | Sample ID (redups) Date (mg/kg) (mg/kg) <t< td=""><td>Sample ID (red bgs) Date (mg/kg) <</td><td>Sample ID (refuge) Date (mg/kg) <t< td=""><td>Sample ID (mg/kg) Turvestee Site (LFR)- March 2009 (mg/kg) (mg/kg)</td><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (med tupe) Date (mg/kg) (mg/kg)</td><td>Sample ID Terreture
(marking) Cample ID Terreture
(marking) <tht< td=""><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID Fuerunt Sample ID Fuerunt Sample ID Fuerunt Fuerunt</td><td>Sample ID (red by) Date (mg/kg) <t< td=""><td>Sample ID (werk by) Dame (mg/kg) (mg/kg)</td><td>Sample ID (mayra) Time Name Time Name</td><td></td><td>Sample ID (nature) $(marka)$ <t< td=""><td>Sample ID (warn) (warn) (mayra) (mayra)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (marka) (marka)</td><td>Sample ID Teruting
Investor Terutinting
Investor Terutintinvestor <t< td=""><td>Sample ID Tenton Tange ID Tenton T</td><td>Sample ID (web kps) Sample ID (web kps) Sample ID (web kps) marks (web kps) (</td><td>Sample (a) Tanker Tan</td><td>Sample ID (advise) (advise)</td><td>Sample D Toolking length Toolking length<!--</td--><td>Sample D Tending Tending</td><td>Sample ID Turbin ID <t< td=""><td>Sample ID Turnishing Amerikan Ameri</td><td>Sample ID (method) ample ID (method) ample ID (method) ample ID (method) (mple) (mple)</td><td>Semanti D (and/m) Samati D (and/m) (and/m)</td><td>Sample II (market) Sample III (market) Sample III (market) Sample III (market) Sample IIII (market) Sample IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII</td></t<></td></td></t<></td></t<></td></t<></td></tht<></td></t<></td></t<> | Sample ID (red bgs) Date (mg/kg) < | Sample ID (refuge) Date (mg/kg) (mg/kg) <t< td=""><td>Sample ID (mg/kg) Turvestee Site (LFR)- March 2009 (mg/kg) (mg/kg)</td><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (med tupe) Date (mg/kg) (mg/kg)</td><td>Sample ID Terreture
(marking) Cample ID Terreture
(marking) <tht< td=""><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID Fuerunt Sample ID Fuerunt Sample ID Fuerunt Fuerunt</td><td>Sample ID (red by) Date (mg/kg) <t< td=""><td>Sample ID (werk by) Dame (mg/kg) (mg/kg)</td><td>Sample ID (mayra) Time Name Time Name</td><td></td><td>Sample ID (nature) $(marka)$ <t< td=""><td>Sample ID (warn) (warn) (mayra) (mayra)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (marka) (marka)</td><td>Sample ID Teruting
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(marking) Cample ID Terreture
(marking) Terreture
(marking) <tht< td=""><td>Sample ID (mg/kg) (mg/kg)</td><td>Sample ID Fuerunt Sample ID Fuerunt Sample ID Fuerunt Fuerunt</td><td>Sample ID (red by) Date (mg/kg) <t< td=""><td>Sample ID (werk by) Dame (mg/kg) (mg/kg)</td><td>Sample ID (mayra) Time Name Time Name</td><td></td><td>Sample ID (nature) $(marka)$ <t< td=""><td>Sample ID (warn) (warn) (mayra) (mayra)</td><td>Sample ID (marka) (marka)</td><td>Sample ID (marka) (marka)</td><td>Sample ID Teruting
Investor Terutinting
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Table 2 Summpary of Historic Soil Analytical Results- Investec Properties Renco-Investec Remedial Assessment LFR 002-08031-20/004

cis-1,2 -DCE	trans-1,2 -DCE	CFC 113	1,1,2-TCA	1,2-pcA	VInyl	Chloro- benzene	Berizene	Xylenes	TPH-Gas (C4-C12)
(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg) .	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
0.0434	<0.005	- 1	<0.005	<0.005	<0.015	<0.005	<0.002	¢0.002	1
1000	100 07		10001	200 01	10 01	10,000			

)

	Sample		1,1,1-TCA	TCE	TCFM	1,1-DGE	1,1-DCA	PCE	dis-1,2 -DCE	trans-1,2 -DCE	CFC 113	1,1,2-TCA	1,2-DCA	Vinyl Chloride	Chloro- benzene	Berizene	Xylenes	TPH-Gas (C4-C12)
Sample ID	(feet bas)	Sample	(ma/ka)	(ma/ka)	(ma/ka)	(ma/ka)	(ma/ka)	(ma/ka)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg) .	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
2P-1-4	4	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	0.0434	<0.005		<0.005	<0.005	<0.015	<0.005	<0.002	¢0.002	1
3P-1-6	9	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	0.0385	<0.005	I	<0.005	<0.005	<0.015	<0.005	<0.002	<0,002	ı
3P-1-8	œ	3/19/07	<0.005	0.0201	<0.005	<0.005	<0.005	<0.005	<0.005	0.00683J	I	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	ı
3P-2-4	4	3/19/07	<0.005	0.0158	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	I	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	I
3P-2-8	æ	3/19/07	<0.005	0.0128	<0.005	<0,005	<0.005	<0.005	<0.005	<0.005	ł	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	I
3P-3-4	4	3/19/07	<0.005	<0.005	<0.005	<0,005	<0.005	<0.005	<0.005	<0.005	1	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	1
3P-3-8	æ	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	0.0997	0.0542	ł	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	I
GP-4-4	4	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	-	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	1
Investec Site (Pau	dre)- January	r & March 2	007 (contir	nued)*			+			-						- 		
3P-4-8	8	3/19/07	<0.005	0.00534J	<0.005	<0,005	<0.005	<0.005	<0.005	<0.005	1	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	I
3P-5-4	4	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	0.0658	0.0132	ı	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	I
GP-5-8	8	3/19/07	<0.005	0.0123	<0.005	<0.005	<0.005	<0.005	0.0281	L76800.0	1	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	1
GP-6-3	en	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0,005	1	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	1
GP-6-8	æ	3/19/07	<0.005	0.109	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	I	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	1
GP-7-4	4	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	1	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	1
GP-7-8	æ	3/19/07	<0.005	0.0148	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	1	<0.005	<0.005	<0,015	<0.005	<0.002	<0.002	1
GP-8-4	4	3/19/07	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	1	<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	1
GP-8-8	8	3/19/07	<0.005	<0.005	<0.005	\$0.05	<0.005	<0.005	<0.005	<0.005		<0.005	<0.005	<0.015	<0.005	<0.002	<0.002	ī
Investec Site (LFI	R)- January 2	2004						-			-	- F		-	5	-	-	
MW-14-10	10	1 1/15/04	<0.002	<0.002	<0.005	<0.005	<0.002	<0.002	<0.002	<0.002		<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	1
MW-15-10	10	1/15/04	<0.002	0.0041	<0.005	<0.005	<0.002	<0.002	<0.002	±0.002	ŀ	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	ı
MW-16-5.0	S	1/15/04	<0,002	<0.002	<0.005	<0.005	<0,002	<0.002	<0.002	<0.002	1	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	1
MW-18-15	15	1/15/04	<0.002	0.0085	<0.005	<0.005	<0.002	<0.002	<0.002	<0.002	·I	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	ı
MW-17-15	15	1/15/04	<0.002	0.022	<0.005	<0.005	<0.002	<0.002	0.0044	<0.002	ı	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	ı
MW-18-15	15	1/16/04	<0.002	0.034	<0.005	<0.005	<0.002	<0.002	0.0044	<0.002	ı	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	1
SB-1N-3.0	n	1/16/04	<0.002	0.082	<0.005	<0.005	<0.002	<0.002	0.0042	<0.002	1	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	1
SB-1N-6.0	9	1/16/04	<0.002	0.0078	<0.005	<0.005	<0.002	<0.002	<0.002	<0.002	I	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	1
SB-10-3.0	e	1/16/04	<0.002	<0.002	<0.005	<0.005	<0.002	<0.002	<0.002	<0.002	ł	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	1
SB-11-3.0	e	1/16/04	<0.002	<0.002	<0.005	<0.005	<0.002	<0.002	<0.002	<0,002	.1	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	I
SB-11-6.0	9	1/16/04	<0.002	<0.002	<0.005	<0.005	<0,002	<0.002	<0.002	<0,002	I	<0.002	<0.002	<0.005	<0.002	<0.002	<0.002	I
SB-12-6.0	9	1/16/04	<0.002	0.0074	<0.005	<0.005	<0.002	<0.002	<0.002	<0.002	-	<0.002	<0.002	×0.005	<0.002	<0.002	<0.002	1
Notes:						:	-		:		the state of the state	1 m-1 m-1	40 and 10 and 10	and better and				
mg/kg: milligrams per kilc	ıgram			TCFM: Trichi	orofluoromelh	ane (Freon 11)			J: result is gre	eater than ine m	elhoa aelecik	ה (ומזו) אחווה מכ	ni leşs man v	ie practical que	anumcanon mun	(thef) 1		
TCA: Trichloroethane				CFC 113: 1,1	i,2-Trichloro-1,	2, 2-trifluoroeth	ane		bgs: below gr	ound surface		-						
TCE: Trichloroethene				DCFM: Dichi	aradilluoromet	hane			VOCs results	analyzed using	Environmenta	al Protection A	gency (EPA) I	Method 8260B				
DCE: Dichloroethene				< Detection	less than indic	aled jaboratory	reporting limit		TPH-gas (C4	-C12) results ar	alyzed using l	EPA Method 8	015.					
DCA: Dichloroethane				15: Detection	ı grealer than t	he laboratory re	aporting limit											
PCE: Tetrachloroethene				-: Not analy:	per													
January 2004 samples a	nalyzed by Del M	ler Anslytical, I.	rvine, CA.															
January & March 2007 si	amples analyzed	by American E	:nvironmental	Testing Labor.	alories (AETL)	Burbank, CA.												
March 2009 and Februar	y 2008 samples	analyzed by O	lfield Environn	nentat & Comp	llance (OEC),	santa Maria, C	×											
*: Padre Associates, Inc.	2007. Results of	Site Assessm	ant Activities, I	Nexxus Proper	ties, 82 Corom	iar Drive, and 1	47 throuh										הפופ האחתה ו	
165 Castilian Drive, Golu	sta, Santa Barbaı	ra County, Cah	fornia, Table 2	2. May.														

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H:\Client Files\P-R\Renco\Investec CPT-MIP 2009\Tables\FINAL- Table 2- Soil Results.xls

Page 2 of 2

FIGURES-





K:/Dats/Graphics/8000/8031/20/Figure 1 MIP Boring Locations2.ai





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6005/TS12 bxm.A single/6005 vsM/abs(or9/200/cons9/bs(or9/:H



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K:/Data/Graphics/8000/8031/20/8031-20 Proposed Well LocationaRev2.al



APPENDIX A

Cone Penetrometer Test (CPT) Boring Logs






APPENDIX B

Laboratory-Reports and Chain-of-Custody Forms for Soil-and Grab Groundwater Samples



OEO

Aaron Hook LFR-Levine Fricke 301 S. Miller St., Ste. 210 Santa Maria, CA 93454

06 April 2009

RE: Renco-Investec Investigation

Work Order: 0900881

Dear Client:

Enclosed is an analytical report for the above referenced project. The samples included in this report were received on 30-Mar-09 09:40 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all-analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report, please do not hesitate to contact the undersigned.

Sincerely,

Lisa Race

Laboratory Manager

307 Roemer Way, Suite 300, Santa Maria, CA 93454

www.oecusa.com

TEĹ: (805) 922-4772 FAX: (805) 925-3376



LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	-Reported:
Santa-Maria CA, 93454	Project Manager: -Aaron-Hook	06-Apr-09 14:20

ANALYTICAL REPORT FOR-SAMPLES

Sample ID	⁻ Laboratory ID	Matrix	Date Sampled	Date Received
HP-IRA/MIP-04-15'	0900881-01	Water	27-Mar-09 10:10	_30=Mar-09 09:40-
HP-IRA/MIP-04-18"	0900881-02	Water	27-Mar-09-08:55	_30-Mar-09 09:40-
HP-IRA/MIP-04-24'	0900881-03	Water	27-Mar-09 09:35	30-Mar-09-09:40-
HP-IRA/MIP-05-14'	0900881-04	Water	27-Mar-09 12:30	30-Mar-09 09:40
HP-IRA/MIP-05-19'	0900881-05	Water	27-Mar-09 13:15	30-Mar-09 09:40
HP-IRA/MIP-05-28'	0900881-06-	Water	27-Mar-09 12:45	30-Mar-09 09:40
HP-IRA/MIP-06-18'	0900881-07	Water	27-Mar-09 14:30	30-Mar-09 09:40
HP-IRA/MIP-06-27'	0900881-08	Water	27-Mar-09 14:45	30-Mar-09 09:40
HP-IRA/MIP-07-27'	0900881-09	Water	27-Mar-09 16:00	30-Mar-09 09:40

Oilfield Environmental and Compliance

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307 Roemer Way, Suite 300, Santa Maria, CA 93454



I FR-I evine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	⁻ Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP-04-15'

0900881=01 (Water)

	"F	Reporting	Ilmite	Dilution	Batch	Prenared	Analyzed	Method	Note
Analyte	Kesuit-				Juliu	Tioparou			
Volatile Organic Compounds by	EPA Method-8260B								
Benzene	0.61	0.50	ug/L	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B	
Bromobenzene	ND	0.50	п		11	н		n	
Bromochloromethane	ND	0.50	IT	· "	II	11	μ	н	
Bromodichloromethane	ND	0.50			II	II		11	
Bromoform	ND	0.50	n	**	II	II	"	11	
Bromomethane	ND	0.50	н	. "	μ	II	n	11	
n-Butylbenzene	ND	0.50	"	11	n	N	н	11	
sec_Butylbenzene	ND	0.50	۳.		н	н	B.	n	
tert-Butylbenzene	ND	0.50	Ħ.	n	н	н	"	н	
Carbon tetrachloride	ND	0.50	N	н	н	41	"	в	
Chlorobenzene	ND	0.50	n	11	Ħ	н	u	"	
Chloroethane	ND	0.50	11		u	u	н	u	
2 Chloroothylyinyl ether	ND	1.0	11	н.	"	11	11	"	
2-Chloroemyrvinyremer	ND	0.50	п	11	н	II	I	u	
Chlorotorn	ND	0.50		n	R	u.	11	н	
2 Chloroteluane	ND	0.50	п	11	н	N (u		
2-Chlorotoluene	ND	0.50		.u.	n	ц	н		
4-Chlorotollielle		0.50		n	н	11	н	"	
1,2-Dibromo-3-chloropropalle	ND	0.50	71	u	u	II	н	11	
Dibromochloromethane		0.50	11		II	11.	н	u	
Dibromomethane		0.50	н	п	н	u	н	"	
1,2-Dichlorobenzene		0.50	. "	11	H	n	11	n	
1,3-Dichlorobenzene		0.50	tı	11		н	H	н	
1,4-Dichlorobenzene		0.50	11	n		**	н	н	,
Dichlorodifluoromethane		0.50		11	u	u .	11	11	
1,1-Dichloroethane	20 ND	0.50		n	н	н.	· "	H	
1,2-Dichloroethane	ND 34	0.50		"	u	н		н	
1,1-Dichloroethene	54 400	5.0	11	10	A904018	02-Apr-09	02-Apr-09	u	
cis-1,2-Dichloroethene	400	0.50	"	1	A904004	01-Apr-09	01-Apr-09	п	
trans-1,2-Dichloroethene		0.50	"		"	n	1	n	
1,2-Dichloropropane		0.50		н	и -	11	IT	н	
1,3-Dichloropropane		0.50	Ħ	п	п	н	11	н	
2,2-Dichloropropane		0.50	п	u	"	"	II		
1,1-Dichloropropene	עא	0.50			"	п	u	I	
cis-1,3-Dichloropropene	UN	0.50	n	Ш	ц	· "	п	ท	
trans-1,3-Dichloropropene	ND	0.50	п	n		н	п	н	
Ethylbenzene	DN	0.50	11		"	н	н	n	
Ethylene dibromide	ND	0.50							
Hexachlorobutadiene	ND	0.50							

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LFR-Levine Ericke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210-	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP-04-15'

0900881-01 (Water)										
Analyte	Result	Reporting Limit	Units_	Dilution	Batch	Prepared	Analyzed	Method	Notes	
Volatile Organic Compounds by I	EPA Method 8260	B.								
Isopropylbenzene	ND	0.50	ug/Ľ	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B		
4-Isopropyl Toluene	ND	0.50	н	"	H	u u		"		
Methylene chloride	ND	1.0	"	"	и	u	n	n		
Naphthalene	ND	0.50	н	"	II	"	11	"		
n-PropyIbenzene	ND	0.50	"	I	u	"	u.	n		
Styrene	ND	-0.50	л	-11	H	n	11	n		
1,1,1,2-Tetrachloroethane	ND	0.50	"	- 11	"	н	· 0	I		
1,1,2,2-Tetrachloroethane	ND	0.50	"	II	"	H	n	н		
Tetrachloroethene (PCE)	0.63	0.50	**	"		п	H	н		
Toluene	ND-	0.50	"	11	11		n	n		
1,2,3-Trichlorobenzene	ND	0.50	ĥ.	u.	n	m	.щ			
1,2,4-Trichlorobenzene	ND	0.50	п	11	U		н			
1,1,1-Trichloroethane	ND	0.50	н	11	n	"	n			
1,1,2-Trichloroethane	ND	0.50	n	"	"	n	н	"		
Trichloroethene (TCE)	1300	5.0	n	_10-	A904018	02-Apr-09	02-Apr-09	н		
Trichlorofluoromethane	1.7	0.50	"	1	A904004	01-Apr-09	01-Apr-09	п		
1,2,3-Trichloropropane	ND	0.50		11	n	н	'n	n		
1,2,4-Trimethylbenzene	ŇD	0.50	n	н .	Π	"	"	, n		
1,3,5-Trimethylbenzene	ND	0.50	n		lt.	Π.	. "	"		
Vinyl chloride	36	0.50	п	н		n	"	п		
Xylenes (total)	ND	0.50	IT	11		u	11			
Surrogate: Dibromofluoromethane		99.0 %	70-1	130	"	"	"	"		
Surrogate: Toluene-d8		99.9 %	70-1	130	"	"	"	"		
Surrogate: 4-Bromofluorobenzene		99.4 %	70-1	130	"	"	n	"		

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria-CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP=04=18' 0900881-02 (Water)

*		Reporting							
Analyte .	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by	EPA Method 8260	В				01.4 00	01.4 7077		
Benzene	ND	0.50	ug/L	• 1	A904004	01-Apr-09-	01-Apr-09	EPA 8260B	
Bromobenzene	ND	0.50				"	"		
Bromochloromethane	ND	0.50		"	"	"	"		
Bromodichloromethane	ND	0.50		"	"	11	"	n 	
Bromoform	ND	0.50		.11.	"	"		n **	
Bromomethane	ND	0.50		Ш	н	n		"	
n-Butylbenzene	ND	0.50	"	u u	н	"	"	IL.	
sec-Butylbenzene	ND	0.50		н	н	"	u .		
tert-Butylbenzene	ND	0.50	u u	"	н	II	n		
Carbon tetrachloride	ND	0.50		IT	п	II	II.		
Chlorobenzene	ND	0.50	17	II	Ħ	н	н	Ш	
Chloroethane	ND	0.50		"	W .	"	II.	H	
2-Chloroethylvinyl ether	ND	1.0		U II	"	II	н	n	
Chloroform	ND	0.50	11	u.	II.	u	н	n	
Chloromethane	ND	0.50		n	"	u	n	u.	
2-Chlorotoluene	ND [.]	0.50	"	н	11	11	n	u	
4-Chlorotoluene	ND	0.50	"	н	11	н	n	"	
1,2-Dibromo-3-chloropropane	ND	0.50	"	н	н	н			
Dibromochloromethane	ND	0.50	11	Ш	н	н	н	и	
Dibromomethane	ND	0.50		н	u	н	Ш	н	
1,2-Dichlorobenzene	ND	0.50		ท่	"	u.	Ш	11	
1,3-Dichlorobenzene	ND	0.50		п	U U	н.	н	11	
1,4-Dichlorobenzene	ND	0.50	IT	п	11		n	n	
Dichlorodifluoromethane	ND	0.50	· II			· •	"	н	
1,1-Dichloroethane	40	0.50	n	"		U II	u	u.	
1,2-Dichloroethane	ND	0.50		n	н	"	u	н	
1,1-Dichloroethene	64	0.50	н	u	II.	II	u	. п	
cis-1,2-Dichloroethene	340	5.0	н	10	A904018	02-Apr-09	02-Apr-09		
trans-1,2-Dichloroethene	9.0	0.50	н	1	A904004	01 - Apr-09	01-Apr-09	· "	
1,2-Dichloropropane	ND	0.50		н	"	II	n	n	
1,3-Dichloropropane	ND	0.50		n	11	n	H	H	
2,2-Dichloropropane	ND	0.50	11	н	R.	н	н		
1,1-Dichloropropene	ND	0.50	н	н	н	· 11	н	II	
cis-1,3-Dichloropropene	ND	0.50	н	II	II	н	н	н	
trans-1,3-Dichloropropene	ND	0.50	"	н	II	U .	u	н	
Ethylbenzene	ND	0.50		"	11		н	ı	
Ethylene dibromide	ND	0.50	"	N	n	II	Ħ	11	·····
Hexachlorobutadiene	ND	0.50	и	"	н	н	н	11	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
-301 S. Miller_St., Ste. 210	Project Number: Remedial Assessment-002-08031.20.004	Reported:
Santa Maria CA, 93454	Project-Manager: Aaron Hook	06-Apr-09 14:20-

HP-IRA/MIP-04-18'

0900881-02 (Water)

Analyte	Result	Reporting Limit	Units	Dilution	Batch-	Prepared	Analyzed	Method	Notes
-Volatile Organic Compounds by EPA	A Method 8260B								
Isopropylbenzene	ND	0.50	ug/L	1	-A:904004-	01-Apr-09	01-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0:50	n	11	н	"	"	н 1	
Methylene chloride	ND	1.0	11	n	н	11	н		
Naphthalene	ND	0.50	11	"	"	11		n	
n-Propylbenzene	ND	0.50	n	н		n	u.	-11	
Styrene	ND	0.50	n		n	u.	n	н	
1,1,1,2-Tetrachloroethane	ND	0.50	-11		11	I	h	н	
1,1,2,2-Tetrachloroethane	ND	0.50	"		n	11	u	n	
Tetrachloroethene (PCE)	ND	0.50	н	n		11	н	17	
Toluene	ND	0.50	н	11	n	II	-tt-	н	
1,2,3-Trichlorobenzene	ND	0.50	"	u	Ħ	I	n	ч	
1,2,4-Trichlorobenzene	ND	0.50	n	н	"	II	n	н	
1,1,1-Trichloroethane	ND	0.50	n	n		u	н	"	
1,1,2-Trichloroethane	2.1	0.50	n	n	n	"	н	n	
Trichloroethene (TCE)	1300	5.0	11	10	A904018	02-Apr-09	02-Apr-09	11	
Trichlorofluoromethane	3.3	0.50		1	A904004	01-Apr-09	01-Apr-09	IL	
1,2,3-Trichloropropane	ND .	0.50	11		n	'n	n	H.	
1,2,4-Trimethylbenzene	ND.	0.50	-11 -	17	n	н	n	π	
1,3,5-Trimethylbenzene	ND	0.50		It	н	н	н	н	
Vinyl chloride	44	0.50	"	n	н	11	ч	н	
Xylenes (total)	NÐ	0.50	"	н	н	n		n	
Surrogate: Dibromofluoromethane		100 %	70-1	30	"	"	п	"	
Surrogate: Toluene-d8		99.8 %	70-1	30	"	n	н	"	
Surrogate: 4-Bromofluorobenzene	·	98.7 %	70-1	30	"	"	"	"	

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LFR-Levine Fricke	Project:_Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454-	Project Manager: Aaron Hook	06-Apr-09 14:20

		HP-IRA	/MIP-0)4-24'					
		0900881	l-03 (W	ater)					
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by EPA	A Method 8260)B							
-Benzene	ND	-0 . 50	ug/L	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B	
Bromobenzene	ND	0.50		u .	H	н	u .	n	
Bromochloromethane	ND	0.50	"	н		н	u .	н	
Bromodichloromethane	ND	0.50	n	u	u	u.	u	n	
Bromoform	ND	0.50	11-	II	н		,li	11	
Bromomethane	ND	0.50	"	II	H		n	"	
n-Butylbenzene	ND	0:50	u	U.	II	H	н	n -	
sec-Butylbenzene	ND	.0.50	11	u	н	н	u	н	
tert-Butylbenzene	ND	0.50	11		IT	n	u –	n	
Carbon tetrachloride	ND	0.50	n	u	"	н	"	11	
Chlorobenzene	ND	0.50		n	II.	н	u	11	
Chloroethane	ND	0.50	11	μ.	U.	"	u	н	
2-Chloroethylvinyl ether	ND	1.0	"	н	и	"	n	"	
Chloroform	ND	0.50	11	н	с и		"	17	
Chloromethane	ND	0.50	п	II	H	"	n	11	
2-Chlorotoluene	ND	0.50	11	н	U.	u.	"	n	
4-Chlorotoluene	ND	0.50	н	I	n	н	н	"	
1,2-Dibromo-3-chloropropane	ND	0.50	"	n	11	"	. "	17	
Dibromochloromethane	ND	0.50	11	н	ħ	н	"	н	
Dibromomethane	ND	0.50	11	. 11	U.	11	"	"	
1,2-Dichlorobenzene	ND	0.50	tt	n	н	u.	"	н	
1,3-Dichlorobenzene	ND	0.50		n	n	U	n	н	
1,4-Dichlorobenzene	ND	0.50	н	п	n	u.	н	"	
Dichlorodifluoromethane	ND	0.50	н	n	1 1 -	"	n		
1,1-Dichloroethane	40	0.50	11	11	n	u.	H	11	
1,2-Dichloroethane	ND	0.50	"	n	n	u.	n	"	
1,1-Dichloroethene	83	0.50	11	R	II.	"	n	"	
cis-1,2-Dichloroethene	240	5.0	н	10	A904018	02-Apr-09	02-Apr-09	**	
trans-1,2-Dichloroethene	13	0.50	11	1	A904004	01-Apr-09	01-Apr-09	17	
1,2-Dichloropropane	ND	0.50	11	U	ц	n	"	11	
1,3-Dichloropropane	ND	0.50	n	U	п	n	IT	н	
2,2-Dichloropropane	ND	0.50	"	u	ч	"	"	11	
1,1-Dichloropropene	ND	0.50	н	n	н	"	H	**	
cis-1,3-Dichloropropene	ND	0.50	н	u	۳.	11	п	11	
trans-1,3-Dichloropropene	ND	0.50	11	n	н	11	TI .	T I	
Ethylbenzene	ND	0.50	н	п	π	11	n	u.	
Ethylene dibromide	ND	0.50	"	u	h	n	"	n	
Hexachlorobutadiene	ND	0.50	11	11	II I	17	n	n	

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1,1,1-Trichloroethane

1,1,2-Trichloroethane

Trichloroethene (TCE)

1,2,3-Trichloropropane

1,2,4-Trimethylbenzene

1,3,5-Trimethylbenzene Vinyl chloride

Surrogate: Dibromofluoromethane

Surrogate: 4-Bromofluorobenzene

Xylenes (total)

Surrogate: Toluene-d8

Trichlorofluoromethane

Oilfield Environmental and Compliance, INC.

LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09_14:20_

-HP-IRA/NITP-04-24'

		090088	1-03 (W	ater)				
		Reporting						
Analyte	Result	Limit	_Units	Dilution	Batch	Prepared	Analyzed	Method
Volatile Organic Compounds by	EPA Method 8260	в					÷	
Isopropylbenzene	ND	0.50	ug/L	-1	A904004	01-Apr-09	01-Apr-09	EPA 8260B
4-Isopropyl Toluene	ND	0.50	"	н	11	"		
Methylene chloride	ND	1.0	"	"	n	u	n	U II
Naphthalene	ND	0.50	"	It	11	n	"	11
n-Propylbenzene	ND	0.50	"	11	11-	n	n	н -
Styrene	ND	0.50	11	н	n	ti	n	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	-11		II.
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	n		11	II.
Tetrachloroethene (PCE)	ND	0.50	**	ų	"	11	11	IT
Toluene	ND	0.50	H-	н	"	H	"	n
1,2,3-Trichlorobenzene	ND	0.50	"	11	11	н	н	
1,2,4-Trichlorobenzene	ND	0.50	"	n	11	н	н	н

0.50 0.50

5.0

0.50

0.50

0.50

0.50

0.50 0.50

97.6 %

99.4 %

97.8 %

11

70-130

70-130

70-130

10

1

A904018

A904004

"

02-Apr-09

01-Apr-09

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02-Apr-09

01-Apr-09

"

ND

2.0 920

2.3

ND

ND

NÐ

45

ND

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Oilfield Environmental and Compliance, INC.

LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reposted:
Santa Maria CA, 93454	Project Manager: Aaron Hook	-06-Apr-09 14:20

HP-IRA/MIP-05-14'

0900881-04 (Water) Reporting Analyte Result Limit Units Dilution Batch Prepared Analyzed Method Notes Volatile-Organic Compounds-by EPA Method 8260B Benzene_ ND 0.50ug/L 1 A904004 01-Apr-09 01-Apr-09 EPA 8260B Bromobenzene ND 0.50 Bromochloromethane ND 0.50 " Bromodichloromethane ND 11 0.50 n Bromoform 11 ND 0.50 Bromomethane ND 0.50 n-Butylbenzene ND 0.50 TŤ. sec-Butylbenzene ND 0.50 tert-Butylbenzene ND 0.50 Carbon tetrachloride ND 0.50 Chlorobenzene ND 0.50 Chloroethane ND 0.50 2-Chloroethylvinyl ether ND 1.0 Chloroform-0.50 ND Chloromethane ND 0.50 2-Chlorotoluene ND 0.50 4-Chlorotoluene ND 0.50 1,2-Dibromo-3-chloropropane ND 0.50 Dibromochloromethane ND 0.50 Dibromomethane ND 0.50 1,2-Dichlorobenzene ND 0.50 1,3-Dichlorobenzene ND 0.50 1,4-Dichlorobenzene ND 0.50 Dichlorodifluoromethane ND 0.50 1,1-Dichloroethane 7.6 0.50 1,2-Dichloroethane ND 0.50 1,1-Dichloroethene 8.4 0.50 cis-1,2-Dichloroethene 210 1.0 2 A904018 02-Apr-09 02-Apr-09 trans-1,2-Dichloroethene 0.50 67 Ħ 1 A904004 01-Apr-09 01-Apr-09 1,2-Dichloropropane ND 0.50 1,3-Dichloropropane ... ND 0.50 2,2-Dichloropropane ND 0.50 1,1-Dichloropropene ND 0.50 11 cis-1,3-Dichloropropene ND 0.50 trans-1,3-Dichloropropene ND 0.50 Ethylbenzene ND 0.50 Ethylene dibromide ND 0.50 Hexachlorobutadiene ND 0.50

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20-004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP-05-14' 0900881-04 (Water)

		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	-Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by]	EPA Method 8260	<u>B</u>							
Isopropylbenzene	ND	0.50	ug/L	1	-A904004	01-Apr-09	01-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.50	н	н	n -	u	н	1	
Methylene chloride	ND	1.0	н	н	н	u	н	"	
Naphthalene	ND	0.50	н	Ш	н -	"	u.		
n-Propylbenzene	ND	0.50	н	n	11	"	"	н	
Styrene	ND	0.50		'n	11	u	"	u	
1,1,1,2-Tetrachloroethane	ND	0.50	н	n	-ti	п	"	н	
1,1,2,2-Tetrachloroethane	ND	0.50	н	11	"	u	۳	u	
Tetrachloroethene (PCE)	ND	0.50	н	n	"	-11	ш	TI .	
Toluene	ND	0.50	11	"	"	u	n	п	
1,2,3-Trichlorobenzene	NÐ	0.50		n	"	н	n	u	
1,2,4-Trichlorob enze ne	ND	0.50	н	n	u	и	u	n	
1,1,1-Trichloroethane	ND	0.50	н	۳	u .	."	n	11	
-1,1,2-Trichloroethane	ND	0.50	п	"	u	и	н	*	
Trichloroethene (TCE)	220	1.0	IT	2	A904018	02-Apr-09	02-Apr-09	11	
Trichlorofluoromethane	ND	0.50	-11-	1	A904004	01-Apr-09	01-Apr-09	n	
1,2,3-Trichloropropane	ND	0.50	н	n	н	u	н	ч.	
1,2,4-Trimethylbenzene	ND	0.50	It	n	"	n	II	н	
1,3,5-Trimethylbenzene	ND	0.50	211.	11	"	н.	11	н	
Vinyl chloride	2.5	0.50	IT	11.	u	H	II	н	
Xylenes (total)	ND	0.50		n		11	JI	· II	
Surrogate: Dibromofluoromethane		101 %	70-	130	".	"	"	"	
Surrogate: Toluene-d8		100 %	70-	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		98.9 %	70-	130	"	<i>H</i> ·	n	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	• •
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP-05-19* 0900881-05-(Water)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by	EPA Method 826()B							-
Benzene	ND	0.50	.ng/[,	ŀ	A 904004	01-Apr-09	01-Apr-09	EPA-8260B	
Bromobenzene	ND	0.50	"	1	"	"	"	1	
Bromochloromethane	ND	0.50	17	u	н	ч	"	н	
Bromodichloromethane	ND	0.50	"	II	"	11		н	
Bromoform	ND	0.50	11	II	н	11-	11	н	
Bromomethane	ND	0.50	н	ır	н	н	u	н	
n-Butylbenzene	ND	0.50	n	II	u	11	u	n	
sec-Butylbenzene	ND	0.50	н	"	-11	11	"	н	
tert-Butylbenzene	ND	0.50	п	11	. "	11	"	н	
Carbon tetrachloride	ND	0.50	11	. "	11	tr.	II.	. n	
Chlorobenzene	ND	0.50	11	п	11	н	н	н	
Chloroethane	ND	0.50	17	11	11		n	n	
2-Chloroethylvinyl ether	ND	1.0	11	'n	II	I I .	"	4	
Chloroform	ND	0.50	п	17	н	п	R-	н	
Chloromethane	ND	0.50	n	"	н .	н	н	11	
2-Chlorotoluene	ND	0.50	н	11	н	" '	۳	н	
4-Chlorotoluene	ND	0.50	tt	n	н	п	n	U.	
1.2-Dibromo-3-chloropropane	ND	0.50	n	11	H-	۳.	n,	u	
Dibromochloromethane	ND	0.50	n	11	, n	11	n	'n	
Dibromomethane	ND	0.50	n	II	н	n	н	IF.	
1.2-Dichlorobenzene	ND	0.50	н	II	н	11	н	n-	
1.3-Dichlorobenzene	ND	0.50	u	н	· II	II	н	U.	
1.4-Dichlorobenzene	ND	0.50	81	н		"	н	н	
Dichlorodifluoromethane	ND	0.50	II	н	н	п	n	н	
1,1-Dichloroethane	5.6	0.50	u	н	н	н	н	н	
1,2-Dichloroethane	ND	0.50	11	II	н	п	n	n	
1,1-Dichloroethene	6.3	0.50	tr	II	н	н	н	11	
cis-1,2-Dichloroethene	130	1.0	n	2	A904018	02-Apr-09	02-Apr-09	н	
trans-1,2-Dichloroethene	28	0.50	n	1	A904004	01-Apr-09	01-Apr-09	н	
1,2-Dichloropropane	ND	0.50	н	II	II	n	11	n	
1,3-Dichloropropane	ND	0.50	п	II	II	n	II	n	
2,2-Dichloropropane	ND	0.50	н	II	н	п	11	'n	
1,1-Dichloropropene	ND	0.50	п	· "	u	n	н	n	
cis-1,3-Dichloropropene	ND	0.50	ti -	u	н	u	н	H	,
trans-1,3-Dichloropropene	ND	0.50	11	н	н	11	11	n	
Ethylbenzene	ND	0.50	н	н	н	IT	"	Π	
Ethylene dibromide	ND	0.50	"	н	н	11	I	п	
Hexachlorobutadiene	ND	0.50	11	"	"	11	n	U	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	-Project Number: Remedial Assessment 002-08031.20.004	Reported:
_Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

-HP=IRA/MIP-05-19'---_0900881-05 (Water)

Analyte	Result	Reporting Limit	Units	Dilution	Batch-	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by H	PA Method 8260	<u>B</u>			-		· .		
Isopropylbenzene	ND-	0.50	ug/L	1	A904004	-01-Apr-09	01-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.50	11	11	H	n	11	n	
Methylene chloride	ND	1.0	п	I	"		II	n	
Naphthalene	ND	0.50	"	11	"	U	11	ti.	
n-Propylbenzene	ND	0.50	"	H	"	u.	π	It	
Styrene	ND	0.50	"	I	11	U.	н	v	
1,1,1,2-Tetrachloroethane	ND	0.50	п	Ħ		II.	н	н	
1,1,2,2-Tetrachloroethane	ND	0.50	н	Ħ	-11-	n	н	II	
Tetrachloroethene (PCE)	0.63	0.50	14	-11	н	H	н	н	
Toluene	ND	0.50	n	н		n	II	"	
1,2,3-Trichlorobenzene	ND	0.50	"	II	н	11	n	n	
1,2,4-Trichlorobenzene	ND	0.50	п		11		п	н	
1,1,1-Trichloroethane	ND	0.50	н	11	**		"	11	
1,1,2-Trichloroethane	ND	0.50	11	u	· 11		"	11	
Trichloroethene (TCE)	380	1.0	n	2	A904018	02-Apr=09	02-Apr-09	n	
Trichlorofluoromethane	ND	0.50	11	1	A904004	01-Apr-09	01-Apr-09	18	
1,2,3-Trichloropropane	ND	0.50	"	Ħ	u	77	"	ti	
1,2,4-Trimethylbenzene	ND	0.50	"	II	U.	ı,	. "	n	
1,3,5-Trimethylbenzene	ND	0.50	"	π	н	н	π	n	
Vinyl chloride	2.7	0.50	11	п	11		н	п	
Xylenes (total)	ND	0.50	"	"	n 	-11	"	"	
Surrogate: Dibromofluoromethane		95.5 %	70-	130	"	"	"	"	
Surrogate: Toluene-d8		98.0 %	70-	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		96.2 %	70-	130	n	-11	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St.,-Ste: 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria-CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

-HP-IRA/MIP-05-28' 0900881-06 (Water)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by EP	A Method 826	0B							
-Benzene	ND	0:50	ug/L	1	A904004	01-Apr-09	01-Apr=09	EPA 8260B	
Bromobenzene	ND	0.50	"	II	"	n N	"	"	
Bromochloromethane	ND	0.50	"	It	n	u ·	n	u	
Bromodichloromethane	ND	0.50	"	IT	н	n	u.	n	
Bromoform	ND	0.50	n	11	IT	н	II	, II	
Bromomethane	ND	-0:50-	11	11		п	"	n	
n-Butylbenzene	ND	0.50	п	u			н	11	
sec-Butylbenzene	ND	0.50	H-	u	н	п	II	н	
tert-Butylbenzene	ND	0.50	"	"	н ⁷	n	п	n	
Carbon tetrachloride	TND	0.50	n	н	n	11		II	
Chlorobenzene	ND	0.50	11	u .	п	11	н	. 11	
Chloroethane	ND	0.50	11	н		I	u		
2-Chloroethylvinyl ether	ND	1.0	"	н	n	H	n	H .	
Chloroform	ND	0.50	"	n	"	"	н	u	
Chloromethane	ND	0.50	II.	н	n	11	"		
2-Chlorotoluene	ND	0.50	"	If	n		n	н	
4-Chlorotoluene	ND	0.50	"	u .	н	'n	n		
1,2-Dibromo-3-chloropropane	ND	0.50	**	н	14	н .	н	n	
Dibromochloromethane	ND	0.50	"	'n	II.	n	п		
Dibromomethane	ND	0.50	ŧ	н	"	II	н	п	•
1.2-Dichlorobenzene	ND	0.50	TI .	11		II.	ч	u	
1.3-Dichlorobenzene	ND	0.50	H	n		II.	'n	п	
1,4-Dichlorobenzene	ND	0.50	п	n	n	"	н		
Dichlorodifluoromethane	ND	0.50	n	"		н	n	н	
1,1-Dichloroethane	ND	0.50	п	n	н	н			
1,2-Dichloroethane	ND	0.50	н	" ·	n	n		"	
1,1-Dichloroethene	ND	0.50	н	n	n	n	n	н	
cis-1,2-Dichloroethene	2.0	0.50	"		п	"	н	и	
trans-1,2-Dichloroethene	ND	0.50	"	н	"	"	н		
1,2-Dichloropropane	ND	0.50	"	n	н	ı	u.	11	
1,3-Dichloropropane	ND	0.50	n	п	"	11		IF	
2,2-Dichloropropane	ND	0.50	"		II	IT	n	ч	
1,1-Dichloropropene	ND	0.50	"	n	н	н	н	IT	
cis-1,3-Dichloropropene	ND	0.50	"		n	11	ŧt	n	
trans-1.3-Dichloropropene	ND	0.50	п	ш	n	и	ш	11	
Ethylbenzene	ND	0.50	н	"	н	н	11		
Ethylene dibromide	ND	0.50	11	u	"	11	n	n	
Hexachlorobutadiene	ND	0.50	n		"		h		

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-301 S. Miller StSte-210 Project Number: Remedial Assessment 002-08031.20.004 Ret	
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Santa Maria CA, 93454 Project Manager: -Aaron Hook 06-Apr	09 14:20

HP-IRA/MIP-05-28'

0900881-06 (Water)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by	EPA Method 8260	в							
Isopropylbenzene	ND	0.50	ug/L	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.50	"	n	u	ır		н	
Methylene chloride	ND	1.0		8	н			н	
Naphthalene	ND	0.50	. "	u	n	".	и	н	
n-Propylbenzene	ND	0.50	n	11	R.	н	н	π-	
Styrene	ND	0.50	n		11	"	n	n	
1,1,1,2-Tetrachloroethane	ND	0.50	Π	н		и	π	н	
1,1,2,2-Tetrachloroethane	ND	0.50		n	u	11	n	п	
Tetrachloroethene (PCE)	ND	0.50	"	н	n	17	n	п	
Toluene	ND	0.50	11	n	н	и	n	n	
1,2,3-Trichlorobenzene	ND	0.50	n	н	-17-	н	n	u `	
1,2,4-Trichlorobenzene	ND	0.50	n	u –	н	· #	н	п	
1,1,1-Trichloroethane	ND	0.50	n	н	n	н	μ	п	
1,1,2-Trichloroethane	ND	0.50	n	n	н	н	11	n	
Trichloroethene (TCE)	2.8	0.50	11	n	п	п	н	n	
Trichlorofluoromethane	ND	0.50	- 11	n	"	н	н	n	
1,2,3-Trichloropropane	ND	0.50	n.	n	n	0	"	11	
1,2,4-Trimethylbenzene	ND	0.50	и	"	"	υ.	IF.	11	
1,3,5-Trimethylbenzene	ND	0.50	п		n	II.	11	п	
Vinyl chloride	ND	0.50	11	"		11	н	11	
Xylenes (total)	ND	0.50	н	"	"		II	и	
Surrogate: Dibromofluoromethane		100 %	70-	130	"	"	"	"	
Surrogate: Toluene-d8		99.8 %	70-	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		98.4 %	70-	130	"	"	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301-S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	-Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP-06-18'

_0900881-07 (Water)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed_	Method	Notes
Volatile Organic Compounds by	EPA Method 8260B								
Benzene	ND	0.50	ug/L	1	A904004	01-Apr-09	-01-Apr-09	EPA 8260B	
Bromobenzene	ND	0.50	"	н		"	<u>-</u>	"	
Bromochloromethane	ND	0.50	"	n			н		
Bromodichloromethane	ND	0.50	"	n		"	н		
Bromoform	ND	0.50	п			п			
Bromomethane	ND	0.50	н	"	н	п	n	н	
n-Butylbenzene	ND	0.50	н	n	и	ч	11	n	
sec-Butylbenzene	ND	0.50	п		."	п	п	μ	
tert-Butylbenzene	ND	0.50	п	n	п	н.	11	n	
-Carbon tetrachloride	NÐ	0.50	n	н	н	н	II		
Chlorobenzene	ND	0.50		п		п.	II	II	
Chloroethane	ND	0.50	"	"	"	н	ır		
2-Chloroethylvinyl ether	ND	1.0	"	II	11	11	μ	п	
Chloroform	ND	0.50	"		n	11	н	и	
Chloromethane	ND	0.50	"	N	u	н	н	11	
2-Chlorotoluene	ND	0.50	"	"	п	"		17	
4-Chlorotoluene	ND	0.50	11	"	п	н	п	IT	
1,2-Dibromo-3-chloropropane	ND	0.50	n	n	"	и .	, n	н	
Dibromochloromethane	ND	0.50	n	п	"	μ	n	n	
Dibromomethane	ND	0.50	п		17	II	н	. 11	
1,2-Dichlorobenzene	ND-	0.50	"	U II	н	н	ŋ		
1,3-Dichlorobenzene	ND	0.50	n	"	н	н	II.		
1,4-Dichlorobenzene	ND	0.50	п .	IT	n	н	п	u	
Dichlorodifluoromethane	ND	0.50	π	"	n	и	11	"	
1,1-Dichloroethane	2.7	0.50	11	IT	11	н	n		
1,2-Dichloroethane	ND	0.50	"	n	н	n	н	n	
1,1-Dichloroethene	2.1	0.50	п	n	n	N	II	"	
cis-1,2-Dichloroethene	160	0.50	tr	n	н	n	11		
trans-1,2-Dichloroethene	140	0.50	п	11	۳	11	n	п	
1,2-Dichloropropane	ND	0.50	"	. 11	"	n		n	
1,3-Dichloropropane	ND	0.50	TI	11		н	11	n	
2,2-Dichloropropane	ND	0.50	п	n	n	H	н	н	
1,1-Dichloropropene	ND	0.50	11	n			н	н	
cis-1,3-Dichloropropene	ND	0.50	11	н	n	n	н	11	
trans-1,3-Dichloropropene	ND	0.50	н	n	IF	n	π	n	
Ethylbenzene	ND	0.50	"	"	н	n	"	II	
Ethylene dibromide	ND	0.50	"	n	"			"	
Hexachlorobutadiene	ND	0.50	n	"	n	n	n		

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LFR-Levine Fricke	_Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria-CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

		HP-IRA	/MIP-()6-18'					
		090088	1-07 (W	ater)					
Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared-	Analyzed	Method	Notes
Volatile Organic-Compounds by I	EPA Method 826)B							
Isopropylbenzene	ND	0.50	-ug/L	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.50	'n	н	U II	н	H	и .	
Methylene chloride	ND	1.0	n	н	11		"	н	
Naphthalene	ND	0.50	н	н		н		н	
n-Propylbenzene	ND	0.50	н	11		н	"	n	
Styrene	ND	0.50	TI	Ħ	н	11		n	9 1
1,1,1,2-Tetrachloroethane	ND	0.50	17	"	"		"	н	
1,1,2,2-Tetrachloroethane	ND	0.50	н	11				н	
Tetrachloroethene (PCE)	ND	0.50	н	11	н	0	н	н	
Toluene	ND	0.50	н	11	"		n	н	
1,2,3-Trichlorobenzene	ND	0.50	н	н		at the	u –	u	
1,2,4-Trichlorobenzene	ND	0.50	н	II		"	"	н	
1,1,1-Trichloroethane	ND	0.50	0	u	n	n	n	н	
1,1,2-Trichloroethane	ND	0.50	н	"	"	n	n	r Ir	
Trichloroethene (TCE)	24	0.50	17	"	"	n	n	N	
Trichlorofluoromethane	ND	0.50	U.	U II	n	"	. "		
1,2,3-Trichloropropane	ND	0.50	11	"	u	u.	11	п	
1,2,4-Trimethylbenzene	ND	0.50	11	11		и.	"	Iŀ	
1,3,5-Trimethylbenzene	ND	0.50	н	11		"	r	н .	
Vinyl chloride	83	0.50	н	n	"	n	11	11	
Xylenes (total)	ND	0.50		н	n	11	11	n	
Surrogate: Dibromofluoromethane		97.6 %	70-	130	"	"	"	"	
Surrogate: Toluene-d8		99.5 %	70-	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		97.4 %	70-	130	"	"	n	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
-Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP-06-27' 0900881-08 (Water)

		Reporting			D . 1	D !	4 1 . 1	36-4-3	Nut
Analyte	Kesuit		Units	Dilution	Batch	rrepared	Analyzed	14161100	INOT
Volatile Organic Compounds by I	EPA Method 826	0B							
Benzene	ND	0.50	ug/L	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B	
Bromobenzene	ND	0.50	"	n	N	н	Π ·	н	
Bromochloromethane	ND	0.50	11	п	11	"	۳	н	
Bromodichloromethane	ND	0.50	"	11	Ħ	".	n	n	
Bromoform	ND	0.50	ti	n	**	11	u.	11	
Bromomethane	ND	0.50	t1	n	11	."	н	tr	
n-Butylbenzene	ND	0.50	н	n	н		н	11	
sec-Butylbenzene	ND	0.50	11	u.	н		u	n	
tert-Butylbenzene	ND	0.50	11	ч	u	н	н	n	
Carbon tetrachloride	ND	0.50	п	н	II	н	н	н	
Chlorobenzene	ND	0.50	21	u.	н	"	n	н	
Chloroethane	ND	0.50	It	п	۳	"	n	п	
2-Chloroethylvinyl ether	ND	1.0	11	11	n	н	n	n	
Chloroform	ND	0.50	п	H	II.	"	u.	. "	
Chloromethane	ND	0.50	. 11		IT	II	n.	"	
2-Chlorotoluene	ND	0.50	n -	"	"	11		11	
4-Chlorotoluene	ND	0.50	1t.	u	n	11	n	н	
1.2-Dibromo-3-chloropropane	ND	0.50	н	"	"	IT	n	н	
Dibromochleromethane	ND	0.50	п	n	"	tt -	۳	н	
Dibromomethane	ND	0.50	"	n	н	n	n	IT	
1.2-Dichlorobenzene	ND	0.50	"	u.	. H	ı		п	
1 3-Dichlorobenzene	ND	0.50	н		н	"	R	н	
1 4-Dichlorobenzene	ND	0.50	11		n	п	н	п	
Dichlorodifluoromethane	ND	0.50	11-	п	н	n	ú	п	
1 1-Dichloroethane	18	0.50	"	11	n	11	и	п	
1.2-Dichloroethane	ND	0.50	"	n	4	u	н	Π	
1.1-Dichloroethene	32	0.50	"	n	и	н	н	Ħ	
cis-1.2-Dichloroethene	72	0.50	"	н	π	11	17	۳.	
trans-1,2-Dichloroethene	3.4	0.50	"		. n	n	n	n .	
1,2-Dichloropropane	ND	0.50	11	п	π	Ħ	n	u	
1,3-Dichloropropane	ND	0.50	**	н	n	⁻ n	n	н	
2.2-Dichloropropane	ND	0.50	It	"		n	II	н	
1.1-Dichloropropene	ND	0.50	11	n		п	u	u	
cis-1.3-Dichloropropene	ND	0.50	н	н	н	н		н	
trans-1.3-Dichloropropene	ND	0.50	n	н	n	н	н	п	
Ethvlbenzene	ND	0.50	11		н	н	н	u	
Ethylene dibromide	ND	0.50	н	н	н	Ħ	n	н	
Heyschlorobutsdiene	ND	0.50	tt.	"	II	"	n	tt	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

_HP-IRA/MIP-06-27' 0900881-08 (Water)

		Reporting_							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed-	Method	Notes
Volatile Organic Compounds by l	EPA Method 8260) <u>B</u>							
Isopropylbenzene	NÐ	0.50	ug/L	1	A904004	01-Apr-09	01-Apr-09	-EPA 8260B	
4-Isopropyl Toluene	ND	0.50	11	"	II	".	u	п	
Methylene chloride	ND	1.0	11	н	. "	н	n	n	
Naphthalene	ND	0.50	"	"	II	n	n	п	
n-Propylbenzene	ND	0.50	п	u	I	n	n	n	
Styrene	ND	0.50	11	н	I	u		п	
1,1,1,2-Tetrachloroethane	ND	0.50	11		11-		н	н	
1,1,2,2-Tetrachloroethane	ND	0.50	11	п	ti ti	H	н	u	
Tetrachloroethene (PCE)	ND	0.50		н	-11	н	н ,	н	
Toluene	ND	0.50	.11		н	н	н	п	
1,2,3-Trichlorobenzene	ND	0.50	17	· •	"	U:	н	н	
1,2,4-Trichlorobenzene	ND	0.50	11		н	11	н	н	
1,1,1-Trichloroethane	ND	0.50	и		н	н	н	н	
1,1,2-Trichloroethane	ND_	0.50	11		н	н	н	п	
Trichloroethene (TCE)	450	2.5	11	5	A904018	02-Apr-09	02-Apr-09	п	
Trichlorofluoromethane	ND	0.50	11	1	A904004	01-Apr-09	01-Apr-09	п	
1,2,3-Trichloropropane	ND	0.50	11-	u	IT	-11	n	н	
1,2,4-Trimethylbenzene	ND	0.50	17	u	n	u.	· II	li.	
1,3,5-Trimethylbenzene	ND	0.50	IT		н	u	11	n	
Vinyl chloride	1.1	0.50	U	н	н	н	17	п ,	
Xylenes (total)	ND	0.50	11	n	"	"	11	"	
Surrogate: Dibromofluoromethane		103 %	70-1	30	"	"	n	11	
Surrogate: Toluene-d8		99.4 %	· 70-1	130	"	"	n	"	
Surrogate: 4-Bromofluorobenzene		99.4 %	70-1	130	"	"	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002=08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron-Hook	06-Apr-09 14:20

HP-IRA/MIP-07-27' 0900881-09 (Water)

Analyte	Result	Reporting Limit	Unite	Dilution	Ratch	Prepared	Anglurad	Method	Noter
		. Linnt	01110	Diation			Anaky250±		Tioles
Volatile Organic Compounds by I	EPA Method 826	0B							
Benzene	ND	0:50	ug/L	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B	_
Bromobenzene	ND	0.50	U II	n	11	n	. 11	n	
Bromochloromethane	ND	0.50	Ħ	n	11	11	"	II	
Bromodichloromethane	ND	0.50	11	U II	"	"	n	m	
Bromoform	ND	0.50	"	н.,	11		n	п	
Bromomethane	ND	0.50	"	IT	н	n	II	н	
n-Butylbenzene	ND	0:50	п	.0	11	π	"	н	
sec-Butylbenzene	ND	0.50	п	"		· R	н	н	
tert-Butylbenzene	ND	0.50	n	n		. 11	н	It	
Carbon tetrachloride	ND	0.50	"	-14-	"	H	"	n	
Chlorobenzene	ND	0.50	п	n	н	11-	n	н	
Chloroethane	ND	0.50	"	н	11	н	17	н	
2-Chloroethylvinyl ether	ND	1.0	"	н	"	ų	п	. "	
Chloroform	ND	0.50	11	"	n .	n	п	н	
Chloromethane	ND	0.50	п	11	"	n	11	n	
2-Chlorotoluene	ND	0.50	"	n	н	n	11	n	
4-Chlorotoluene	ND	0.50	11	n	н	n	"	н	
1,2-Dibromo-3-chloropropane	ND	0.50	11	п		. 11		n	
Dibromochloromethane	ND	0.50	n	n.	n	11		n	
Dibromomethane	ND	0.50	н	II	n	н	11	n	
1,2-Dichlorobenzene	ND	0.50	н	n	*	н	· 11	-11	
1.3-Dichlorobenzene	ND	0.50	н	'n	. 11	n	tt	"	
1,4-Dichlorobenzene	ND	0.50	н	n	n		n	n	
Dichlorodifluoromethane	ND	0.50	n	н	n	и	II	n	
1.1-Dichloroethane	2.0	0.50	n	"	n	h	II	17	
1,2-Dichloroethane	ND	0.50	"	и		Ħ		n	
1,1-Dichloroethene	2.7	0.50	11		п	п	n	II	
cis-1,2-Dichloroethene	26	0.50	IT	μ	н	н	n		
trans-1,2-Dichloroethene	4.1	0.50	"			ŋ	н	н	
1,2-Dichloropropane	ND	0.50	11	11		11	II.	n	
1,3-Dichloropropane	ND	0.50	ti.	n	"	u	n	11	
2,2-Dichloropropane	ND	0.50	"	н	"	н	н	n	
1,1-Dichloropropene	ND	0.50	и	11	"	u	н	п	
cis-1,3-Dichloropropene	ND	0.50	"	"	n	н	n	n	
trans-1,3-Dichloropropene	ND	0.50	"	tr	n	n	"	n	
Ethylbenzene	ND	0.50	"	n	"	"	н	н	
Ethylene dibromide	ND	0.50	n	"	It	n	11	11	
Hexachlorobutadiene	ND	0.50	"	"				n	

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301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa-Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

HP-IRA/MIP-07-27'

0900881-09 (Water)

		Reporting							
Analyte	Result	Limit	Units	Dilution	-Batch-	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds by	EPA Method-8260	B							
Isopropylbenzene	ND	.0:50	ug/L	1	A904004	01-Apr-09	01-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.50	11	11	"	н	N	н	
Methylene chloride	ND	1.0	н	μ	11			n	
Naphthalene	ND	0.50	n	II.	п	n	"	μ	
n-Propylbenzene	ND	0.50	н	H.	n -	h	U.	н	
Styrene	ND	0.50	IT	n		n	н	II .	
1,1,1,2-Tetrachloroethane	_ND	0.50	11	11	n	H	"	· "	
1,1,2,2-Tetrachloroethane	ND	0.50	-11	H	u –	II	n		
Tetrachloroethene (PCE)	ND	0.50	IT	н	11		n	н	
Toluene	ND	0.50	н	H		н	11	н	
1,2,3-Trichlorobenzene	ND	0.50	11	17		"n	u	н	
1,2,4-Trichlorobenzene	ND	0.50	11	n	n	π	11	11	
1,1,1-Trichloroethane	ND	0.50	IT	н	n	11	н	"	
1,1,2-Trichloroethane	ND	0.50	11	n		ti	н	17	
Trichloroethene (TCE)	15	0.50	"	n	n	"	н	"	
Trichlorofluoromethane	ND	0.50	11	11	R	11	н	н.	
1,2,3-Trichloropropane	ND	0.50	11:	11	n	"	н		
1,2,4-Trimethylbenzene	ND	0.50	11	"	u		· • •		
1,3,5-Trimethylbenzene	ND-	0.50	**	n	"	н	n	н	
Vinyl chloride	0.95	0.50	п.	n	n	с п	н	11	
Xylenes (total)	ND	0.50	"	μ	n	"	Ħ		
Surrogate: Dibromofluoromethane		98.1 %	70-	130	"	"	"	"	
Surrogate: Toluene-d8		98.6 %	70-	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		99.1 %	70-	130	"	"	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

Volatile-Organic Compounds by EPA-Method 8260B - Quality Control-

Analyte	Result	Reporting Limit	Units	Spike -Level	Source Result-	%REC	%REC Limits	RPD	RPD Limit	Notes-
Batch A904004 - EPA 5030B V	OCGCMS									
Blank (A904004-BLK1)				Prepared	& Analyze	d . 01-Ap	r-09			
Benzene	ND	0.50	ug/L			F				
Bromobenzene	ND	0.50	"							
Bromochloromethane	ND	0.50	ti							
Bromodichloromethane	ND	02.0	н							
Bromoform	ND	0.50	н							
Bromomethane	ND	0.50	н							
n-Butylbenzene	ND	0.50	"							
sec-Butylbenzene	ND	0.50	n .							
tert-Butylbenzene	ND	0.50	u.							
Carbon tetrachloride	· ND	0.50	н -							
Chlorobenzene	ND	0.50	11-							
Chloroethane	ND	0.50	11							
2-Chloroethylvinyl ether	ND	1.0	n							
Chloroform	ND	0.50	н							
Chloromethane	ND	0.50	n							
2-Chlorotoluene	ND	0.50	н							
4-Chlorotoluene	ND	0.50	"							
1,2-Dibromo-3-chloropropane	ND	0.50	н ·							
Dibromochloromethane	ND	0.50	"				•			
Dibromomethane	ND	0.50	н							
1,2-Dichlorobenzene.	ND	0.50	ti							
1,3-Dichlorobenzene	ND	0,50	н							
1,4-Dichlorobenzene	ND	0.50	n							•
Dichlorodifluoromethane	ND	0.50	n							
1,1-Dichloroethane	ND	0.50								
1,2-Dichloroethane	ND	0.50	"							
1,1-Dichloroethene	ND	0.50	н					•		
cis-1,2-Dichloroethene	ND	0.50	н							
rans-1,2-Dichloroethene	ND	0.50	н							
1,2-Dichloropropane	ND	0.50	н							
1.3-Dichloropropane	ND	0.50	11							
2.2-Dichloropropane		0.50	н							
1,1-Dichloropropene		0.50	17							
cis-1,3-Dichloropropene		0.50	n							
rans-1,3-Dichloropropene		0.50	u							
Ethylbenzene		0.50								
Ethylene dibromide		0.50								
Iexachlorobutadiene		0.50								
sopropylbenzene		0.50	н							
Jopropyl Tolyopo		0.50								

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-301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
–Santa-Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

Volatile Organic-Compounds by EPA Method 8260B - Quality Control

Analyte	Result	-Reporting Limit	Units	Spike Level	Source Result	%REC	%REC	RPD	RPD -Limit	Notes
Batch A904004 - EPA 5030B VO	CGCMS									
Blank (A904004=BLK1)				Prepared	& Analyze	ed: 01-Ap	-09			
Methylene chloride	ND	1.0	ug/L			<u>F</u> .				
Naphthalene	ND	0.50	"						•	
n-Propylbenzene	ND	0.50	н							
Styrene	ND	0.50	-11							
1,1,1,2-Tetrachloroethane	ND	0.50	н							
1,1,2,2-Tetrachloroethane	ND	0.50	п.							
Tetrachloroethene (PCE)	ND	0.50	"							
Toluene	ND	0.50	n							
1,2,3-Trichlorobenzene	ND	0.50								
1,2,4-Trichlorobenzene	ND	0.50	н							
1,1,1-Trichloroethane	ND	0.50								
1,1,2-Trichloroethane	ND	0.50	н							
Trichloroethene (TCE)	ND	0.50								
Trichlorofluoromethane	ND	0.50	u.							
1,2,3-Trichloropropane	ND	0.50	n							
1,2,4-Trimethylbenzene	ND	0.50	н							
1,3,5-Trimethylbenzene	ND	0.50	и							
Vinyl chloride	ND	0:50	н							
Xylenes (total)	ND	0.50	n				•			
Surrogate: Dibromofluoromethane	23.8		"	25.0		95.3	70-130			
Surrogate: Toluene-d8	24.6		"	25.0		98:2	70-130			
Surrogate: 4-Bromofluorobenzene	23.6		"	25.0		94.4	70-130			
LCS (A904004-BS1)				Prepared &	& Analyze	d: 01-Apr	-09			
Benzene	24.0	0.50	ug/L	25.0		96.0	70-130		· .	
Chlorobenzene	24.3	0:50	н	25.0		97.1	70-130			
1,1-Dichloroethene	24.6	0.50	n	, 25.0		98.4	70-130			
Toluene	24 .1	0.50	11	25.0		96.6	70-130			
Trichloroethene (TCE)	24.2	0.50	н	25.0		96.9	70-130			
Surrogate: Dibromofluoromethane	23.6		"	25.0		94.3	70-130			
Surrogate: Toluene-d8	25.0		"	25.0		99.9	70-130			
Surrogate: 4-Bromofluorobenzene	24.3		п	25.0		97.1	70-130			

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller-St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD.	RPD Limit	Notes-
Batch_A904004EPA-5030B VOC0	GCMS									
LCS Dup (A904004-BSD1)				Prepared	& Analyze	ed: 01-Ap	r-09			
Benzene	24.1	0.50	ug/L	25.0		96.5	70-130	0.540	20	
Chlorobenzene	24.3	0.50	н	25.0		97.2	70-130	0.123	20	
1,1-Dichloroethene	24.9	0.50	н	25.0		99.4	70-130	1.09	20	
Toluene	23.8	0.50	-11.	25.0		95.1	70-130 [.]	1.54	20	
Trichloroethene (TCE)	24.0	0.50	-4-	25.0		95.8	70-130	1.08	20	
Surrogate: Dibromofluoromethane	24.3		11	25.0		97.3	70-130			
Surrogate: Toluene-d8	24.8		ır	25.0		99 .2	70-130			
Surrogate: 4-Bromofluorobenzene	24.1		"	25.0		96.4	70 - 130			
Duplicate (A904004-DUP1)	So	urce: 090088	1-01	Prepared	& Analyze	ed: 01-Ap:	r-09			
Benzene	0.570	0:50	ug/L		0:610			6.78	20	
Bromobenzene	ND	0.50	n		ND				20	
Bromochloromethane	ND	0.50	"		ND				20	
Bromodichloromethane	ND	0.50	u		ND				20	
Bromoform	ND	0.50	"		ND				20	
Bromomethane	ND	0.50			ND				20	
n-Butylbenzene	ND	0.50	h		ND				20	
sec-Butylbenzene	ND	0.50	н		ND				20	
tert-Butylbenzene	ND	0.50	н		ND		•		20	
Carbon tetrachloride	ND	0.50	н		ND				20	
Chlorobenzene	ND	0.50	н		ND				20	
Chloroethane	ND	0.50	н		ND				20	
2-Chloroethylvinyl ether	ND	1.0	n		ND				20	
Chloroform	ND	0.50	11		ND				20	
Chloromethane	ND	0.50	n		ND				20	
2-Chlorotoluene	ND	0.50	n		ND				20	
4-Chlorotoluene	ND	0.50	н		ND				20	·
1,2-Dibromo-3-chloropropane	ND	0.50	II		ND				20	
Dibromochloromethane	ND	0.50	11		ND				20	
Dibromomethane	ND	0.50	n		ND				20	
1,2-Dichlorobenzene	ND	0.50			ND				20	
1,3-Dichlorobenzene	ND	0.50	"		ND				20	
1,4-Dichlorobenzene	ND	0.50	"		ND				20	
Dichlorodifluoromethane	ND	0.50	"		ND				20	
1,1-Dichloroethane	18.4	0.50	"		19.8			7.69	20	
1,2-Dichloroethane	ND	0.50	11		ND				20	
1,1-Dichloroethene	32.5	0.50	н		34.1			4.74	20	
cis-1,2-Dichloroethene	301	0.50	'n		316			4.76	20	
trans-1,2-Dichloroethene	38.7	0.50	"		40.3			3.98	20	
1,2-Dichloropropane	ND	0:50-			ND				20	
1,3-Dichloropropane	ND	0.50	n		ND				20	

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LFR-Levine Fricke	Project: Renco-Investec Investigation			
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:		
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20		

Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units-	Spike Tevel	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch-A904004 - EPA 5030B VO	CGCMS									
Duplicate-(A904004-DUP1)	Sou	rce: 090088	 1-01	Prepared	& Analyze					
2,2-Dichloropropane	ND	0.50	ug/L		ND	<u></u>				
1,1-Dichloropropene	ND	0.50	"		ND				-20	
cis-1,3-Dichloropropene	ND	0.50	11		ND				20	
trans-1,3-Dichloropropene	ND	0.50	**		ND				20	
Ethylbenzene	ND	0.50			ND				20	
Ethylene dibromide	ND	0.50	-11-		ND				20	
Hexachlorobutadiene	ND	0.50			ND				20	
Isopropylbenzene	ND	0:50	п.,		NTO				20	
4-Isopropyl Toluene	ND	.0.50	н		ND				20	
Methylene chloride	ND	1.0			ND				20	
Naphthalene	ND	0:50	n		ND				20	
n-Propylbenzene	ND	0.50	u		ND				20	
Styrene	ND	0.50	4						20	
1,1,1,2-Tetrachloroethane	ND	0.50	n						20	
1,1,2,2-Tetrachloroethane	ND	0.50	n						20	
Tetrachloroethene (PCE)	0.670	0.50	н		0.630			615	20	
Toluene	ND	0.50	n					0.15	20	
1,2,3-Trichlorobenzene	ND	0.50	h.		NT				20	
1,2,4-Trichlorobenzene	ND	0.50			ND				20	
1,1,1-Trichloroethane	ND	0.50	n		ND				20	
1,1,2-Trichloroethane	ND	0.50	н						20	
Trichloroethene (TCE)	607	0.50	н		623			2.50	20	
Trichlorofluoromethane	1.58	0.50	н		1.68			2.50	20	
1,2,3-Trichloropropane	ND	0.50	л		1.08			0.13	20	
1,2,4-Trimethylbenzene	ND	0.50	н						20	
1,3,5-Trimethylbenzene	ND	0.50	n						20	
Vinyl chloride	34.8	0.50	н		36.0			2 27	20	
Xylenes (total)	ND	0.50	н		ND			3.31	20 20	
Surrogate: Dibromofluoromethane	24.7		"	25.0		98.7	70-130			
Surrogate: Toluene-d8	24.7		"	25.0		98.9	70-130			
Surrogate: 4-Bromofluorobenzene	24.0		n	25.0		96.1	70-130			

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported: _
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

Volatile Organic Compounds by EPA Method-\$260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level—	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A904018 - EPA 5030B VOCG	CMS									
Blank (A904018-BLK1)				Prepared &	& Analyze	ed: 02-Ap	r-09			
Benzene	ND	0.50	ug/L							
Bromobenzene	ND	0.50	tt.							
Bromochloromethane	ND	0.50							•	
Bromodichloromethane	ND	0.50	11							
Bromoform	ND	0 <i>.5</i> 0	n							
Bromomethane	ND	0.50	-11							
n-Butylbenzene	ND	0.50								
sec-Butylbenzene	ND	0.50	11-							
tert-Butylbenzene	ND	0.50	"							
Carbon tetrachloride	ND	0.50	11							
Chlorobenzene	ND	0.50	H							
Chloroethane	ND	0.50	п							
2-Chloroethylvinyl ether	ND	1.0	"							
Chloroform	ND	0.50	u							
Chloromethane	ND	0.50	11							
2-Chlorotoluene	ND	0.50	n							
4-Chlorotoluene	ND	0.50	u							
1.2-Dibromo-3-chloropropane	ND	0.50								
Dibromochloromethane	ND	0.50	u.							
Dibromomethane	ND	0.50	н							
1.2-Dichlorobenzene	ND	0.50	н							
1.3-Dichlorobenzene	ND	0.50	н							
1.4-Dichlorobenzene	ND	0.50	н							
Dichlorodifluoromethane	ND	0.50	н							
1 1-Dichloroethane	ND	0.50	It							
1 2-Dichloroethane	ND	0.50	IŤ							
1 1-Dichloroethene	ND	0.50	μ							
cis-1 2-Dichloroethene	ND	0.50	п							
trans-1 2-Dichloroethere	ND	0.50	п							
1 2-Dichloropropane	ND	0.50	п							
1 3-Dichloropropane	ND	0.50	н							·
2 2-Dichloropropane		0.50	n							
1 1-Dichloropropene	ND	0.50	н							
cis_1 3-Dichloropropene	ND	0.50	n							
trans_1 3-Dichloronronene		0.50	п							
Tthylpersene		0.50	п							
Ethylene dibromide		0.50	п							
Hevachlorobutadiene		0.50	н							
Isopropulberzene		0.50	17							
	עיג זא	0.50 0- 5 0								

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste-210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20-

Volatile Organic Compounds by EPA Method 8260B-- Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD- Limit	Notes
Batch A904018 - EPA 5030B VC	OCGCMS									
Blank (A904018-BEK1)				Prepared a	& Analyze	d: 02-Api	-09			
Methylene chloride	ND	1.0	ug/L							
Naphthalene	ND	0.50								
n-Propylbenzene	ND	0.50	n							
Styrene	ND	0.50	11							
1,1,1,2-Tetrachloroethane	ND	0.50	"							
1,1,2,2-Tetrachloroethane	ND	0.50	"							
Tetrachloroethene (PCE)	ND	0.50	"							
Toluene	ND	0.50	π							
1,2,3-Trichlorobenzene	ND	0.50	"							
1,2,4-Trichlorobenzene	ND	0.50	н			-				
1,1,1-Trichloroethane	ND	0.50	"							
1,1,2-Trichloroethane	ND	0.50	n							
Trichloroethene (TCE)	ND	0.50	Ħ							
Trichlorofluoromethane	ND	0.50	H.							
1,2,3-Trichloropropane	ND	0.50	"							
1,2,4-Trimethylbenzene	ND	0.50	"							
1,3,5-Trimethylbenzene	ND	0.50	.11							
Vinyl chloride	ND	0.50	"							
Xylenes (total)	ND	0.50	"				•			
Surrogate: Dibromofluoromethane	23.7		"	25.0		94.8	70-130			
Surrogate: Toluene-d8	24.5		"	25.0		98.0	70-130			
Surrogate: 4-Bromofluorobenzene	24.5		"	25.0		98.1	70-130			
LCS (A904018-BS1)				Prepared &	& Analyze	d: 02-Apr	-09 ·			
Benzene	24.0	0.50	ug/L	25.0		95.8	70-130			<u> </u>
Chlorobenzene	24.1	0.50	-	25.0		96.4	70-130			
1,1-Dichloroethene	25.2	0.50	"	25.0		101	70-130			
Toluene	23.8	0.50	"	25.0		95.2	70-130			
Trichloroethene (TCE)	24.2	0.50		25.0		96.6	70-130			
Surrogate: Dibromofluoromethane	24.4		"	25.0		97.4	70-130			
Surrogate: Toluene-d8	24.8		"	25.0		99.3	70-130			
Surrogate: 4-Bromofluorobenzene	24.4		"	25.0		97.7	70-130			

Oilfield Environmental and Compliance

The results in this report apply to the samples analyzed in accordance with the chain of the results in this report appy to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. TEL: (805) 922-4772 WWW.OECUSA.COM FAX: (805) 925-3376

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Oilfield Environmental and Compliance, INC.

LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

Volatile Organic Compounds by EPA Method 8260B - Quality Control-

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A904018 - EPA 5030B VO	CGCMS	_								
LCS Dup (A904018-BSD1)				Prepared	& Analyze	d: 02-Ap	r=09			
Benzene	24.4	0.50	ug/L	25.0		97.4	70-130	1.66	20	
Chlorobenzene	24.0	0.50	11	25.0		96.2	70-130	0.208	20	
1,1-Dichloroethene	24.7	0.50	n	25.0		98.6	70-130	2.01	20	
Toluene	24.2	0.50	"	25.0		96.8	70-130	1.62	20	
Trichloroethene (TCE)	24.0	0.50	"	25.0		96.2	70-130	0.498	20	
Surrogate: Dibromofluoromethane	24.8		"	25.0		99.3	70-130			
Surrogate: Toluene-d8	25.3		n	25.0		101	70-130			
Surrogate: 4-Bromofluorobenzene	25.0		н	25.0 [.]		99.8	70-130			
Duplicate (A904018-DUP1)	Sou	irce: 0900843	3-01	Prepared	& Analyze	d: 02-Api	-09			
Benzene	ND	0.50	ug/L		ND				20	
Bromobenzene	ND	0.50	н		ND .				20	
Bromochloromethane	ND	0.50	"		ND				20	
Bromodichloromethane	ND	0.50_	"		ND				20	
Bromoform	ND	0.50	n		ND				20	
Bromomethane	ND	0.50	n		ND				20	
n-Butylbenzene	ND	0.50	H		ND				20	
sec-Butylbenzene	ND	0.50	н		ND				20	
tert-Butylbenzene	ND	0.50	"		ND				20	
Carbon tetrachloride	ND	0.50	н -		ND				20	
Chlorobenzene	ND	0.50	11		ND				20	
Chloroethane	ND	0.50	н		ND				20	
2-Chloroethylvinyl ether	ND	1.0	n		ND				20	
Chloroform	ND	0.50	п		ND				20	
Chloromethane	ND	0.50	n		ND				20	
2-Chlorotoluene	ND	0.50	н						20	
4-Chlorotoluene	ND	0.50	11						20	
1,2-Dibromo-3-chloropropane	ND	0.50	"		ND				20	
Dibromochloromethane	ND	0.50							20	
Dibromomethane	ND	0.50	"						20	
1,2-Dichlorobenzene	· ND	0.50	n						20	
,3-Dichlorobenzene	ND	0.50	11						20	
,4-Dichlorobenzene	ND	0.50	n						20	
Dichlorodifluoromethane	ND	0.50	n						20	
1,1-Dichloroethane	ND	0.50	n						20	
,2-Dichloroethane	ND	0.50	H						20	
,1-Dichloroethene	ND	0.50	W						20	
cis-1,2-Dichloroethene		0.50							20	
rans-1,2-Dichloroethene		0.50	"						20	
2-Dichloropropane	ND	0.50	u						20	
3-Dichloropropage		0.50			U				20	

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LFR-Levine Fricke	Project:-Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20

Volatile Organic Compounds by EPA Method=8260B - Quality-Control

Analyte	Result	Reporting- Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A904018 - EPA 5030B_VOC	CGCMS									
Duplicate (A904018-DUP1)	Sour		3-01	Prepared-	& Analyze	d: 02-Ap	r-09			
2,2-Dichloropropane	ND	0.50	ug/L	•	ND				20	
1,1-Dichloropropene	ND	0.50	н		ND				20	
cis-1,3-Dichloropropene	ND	0.50	u		ND				20	
trans-1,3-Dichloropropene	ND	0.50			ND				20	
Ethylbenzene	ND	0.50	u		ND				20	
Ethylene dibromide	ND	0.50			ND				20	
Hexachlorobutadiene	ND	0.50			ND				20	
Isopropylbenzene	ND	0.50	н.		ND				20	
4-Isopropyl Toluene	1.35	0.50	н		ND				20	
Methylene chloride	ND	1.0	н		ND				20	
Naphthalene	ND	0.50	IF.		ND				20	
n-Propylbenzene	ND	0.50	u.		ND				.20	
Styrene	ND	0.50	n		ND				20	
1,1,2-Tetrachloroethane	ND	0.50	11		ND				20	
1,1,2,2-Tetrachloroethane	ND	0.50	н		ND				20	
Tetrachloroethene (PCE)	ND	0.50	н		ND				20	
Toluene	0.560	0.50	n		ND				20	
1,2,3-Trichlorobenzene	ND	0.50	11		ND				20	
1,2,4-Trichlorobenzene	ND	0.50	n		ND				20	
1,1,1-Trichloroethane	ND	0.50	н		ND				20	
1,1,2-Trichloroethane	ND	0.50-	21		ND				20	
Trichloroethene (TCE)	ND	0.50	н		ND				20	
Trichlorofluoromethane	ND	0.50	n		ND				20	
1,2,3-Trichloropropane	ND	0.50	n		ND				20	
1,2,4-Trimethylbenzene	ND	0.50	μ		ND				20 ⁻	
1,3,5-Trimethylbenzene	ND	0.50	н		ND				20	
Vinyl chloride	ND	0.50	н		ND				20	
Xylenes (total)	ND	0.50	11		ND				20	
Surrogate: Dibromofluoromethane	24.5		n	25.0		98.0	70-130			
Surrogate: Toluene-d8	24.7		"	25.0		98.7	70-130			
Surrogate: 4-Bromofluorobenzene	24.7		"	25.0		98.9	70-130			

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	06-Apr-09 14:20-

-Notes-and Definitions

_DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

RPD Relative Percent Difference

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CHAIN OF CUSTODY	<pre>commax / 001-08031-70-004</pre>									The for the Not	lyen Grae asone d				in the second	ع. المالية المالية				¥1.				
Highway 33, McKittrick CA																			0940 comments/PO#: 7-2323	0040	یں۔ عبد اسان کا محمد اسان کا محمد محمد محمد محمد محمد محمد محمد محم	· · ·	والفارية والمراجع المراجع مساحد والمراجع والمراجع	
Oilfield Environmental and Compliance 307 Roemer Way Suite 300, Santa Maria CA 93454	phone: (805) 922-44/2 Tax: (000) 222-5310 WWW. 010-5		1/20 Sr. STE 200	MATER , CA , 973454	D FAX: 305-304 7176 E-MAIL: ANDN HENRO HE COM	Sampler: AWH	PDF- KV, CONJUNTEDF- C EDD- C	ys: 🗌 6 Days, 🔀 72 hr. 🗍 48 hr. 🗍 24 hr. 🛄 ASAP 🛄	a/Time: Matrix # of Cilent Sample ID	1/1010 (40 3 (4P-200/Mag-04-15/		-04-24	1315 - 05 -14 - 05 -14 -	1 50-50- 1 SHL	1430 1 -06-18'	1445 - 06-27	1600 L V 107-27		N / N Date: 3/ 30/04 Time:	UNIA POLA Date: 3-30-09 Time:	The second s	Date: Time:	ין איז	Date:
		Company.	Address: 301 S. MCI	City/State/ZiP: SAN 70 N	Phone: 905 - 349- 7-18	Report To: Act Car H	Send report via- FAX-	Tumaround Time: 10 De		a street say a gette									Relinquished By:	Received By:	Relinquished By-	Received By:	Relinquished By:	Received By:

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ECELPT CLIENT: X PT, CONDITION & PRESERVATIO PT, CONDITION & PRESERVATIO COC document(s) received with sam COC document(s) received with sam COURTIONS: COURTINE: CON COURTINE: CON CON COURTINE: CON CON CON CON CON CON CON CON	F OECID#: OR SS/ Temp: 6 °C	N: Yes No N/A (*) PROBLEM CHAIN FORM NEEDED pjes 21 D* D Custody Seals (circle); Present Alsent tion 25 D* D Samples (circle); Present Alsent tion 25 D* D Method of Shipment & Tracking fl(t applicable); a (D) D** D Method of Shipment & Tracking fl(t applicable);	HANGES AUTHORIZED BY: the ResCl. Matrix Date/Time Comments / Remarks/ ApH Sempled Condition Notes, Etc.
	ECELPT CLIENT: XL	P.T., CONDITION & PRESERVATION COC document(s) received with sample COC document(s) received with sample Container label(s) consistent with COC ge* Container label(s) consistent with COC mp) Correct containers for analysis requester it inside] Proper preservation on sample label(s) OEC preservative added (**note std 1	RECTIONS: CF Contribution Description CC SV045AC

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0000mm	 Container(s) NOT 1 Custody Scals Brok 	L'Ame	of Authorization Contact		
LF WS	fected, as necessary. with samples at with COC	have be	(erbal, email, etc.) – Cli		-01 19
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AIN CL Nittals): <u>3</u>	OF ISSUE(S) BELOW- below)	uked y	ue#[if_necessary] – Desc		(DATE/TIME/INFTIAL
PROBLEM CH	PLEASE PROVIDE DETAILS ceived Outside Temp. Range (see 1 minimers for analysis requested fimituple, identify with numbers)	Vom's w	ONS; MINIMUM INFO: Iss		ILUTION OF ISSUES BY
ODO ODO	ISSUE(S): Samples Re Theorect co PC OTHER: (1)		RESOLUTI		FINAL RESC

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LFR & G ARCADIS CORP

Purchase Order # 22323

1900 Powell Street, 12th Floor Emeryville, CA 94608-1827 310:652.4500, FAX: 510.652.2246 Issue Date: 3/30/09 Start Date: 3/23/2009 Finish Date: 12/31/2009

To: Olifield Environmental Compliance 307 Roemer Way, Suite 300, Santa Mària, CA 93454	Bill to: LFR Inc. Attn: Accounting Liaison 301 South Miller Street, Suite 210	LFR Project Information Project Code: 002-08031-20 Phase Code(s):004 PM: Timothy L. Limbers Project Location:
805-922-4772, FAX: 805-925-3376	Santa Maria, CA 93454	Invested, 147-165 Castillian
Attn: LFR VENDOR ID # 201878	(805) 349-7180, FAX: (805) 349-7176 P.O. # MUST APPEAR ON ALL INVOICES	Goleta, Ca

A current copy of your certificate of insurance is already on file.

<u></u>	Qty	UnitCo	st UnitType	Pricing	Total
	16	\$85.00	sample	UP, NTE	S1,360.00
	Gra	and tal:			\$1,360.00
				• • • · ·	•
"		<u> </u>	4 <u>114</u>	1	
		Qty 16 Gr To	Qty UnitCo 16 S85.00 Grand Total:	Qty UnitCost UnitType 16 585.00 sample Grand Total:	Qty UnitCost UnitType Pricing 16 S85.00 sample UP, NTE Grand Total:

•.

This PO is hereby accepted and executed by duly authorized representatives of Subcontractor and LFR.

By Subcontractor	Date	By LFR Authorized Pro Manager	oject Date
		Manager	19 0 C

Upon the earlier of the commencement of the Work or acceptance of this Purchase Order. Subcontractor agrees to LER's General Terms and Conditions alleched hereto by reference and made a part of this Purchase Order.

Hook, Aaron

From: Julius Carstens [joarstens@oecusa.com] Sent: Friday, March 20, 2009-8:48 AM

To: Hook, Aaron

Subject: RE: Renco / Regency prices

Yes. That should be fine. And thank you for getting us paid on some old stuff.

Julius

From: Hook, Aaron [mailto:Aaron Hook@lfr.com] Sent: Friday, March 20, 2009-6:45 AM To: Julius Carstens Subject: RE: Renco / Regency prices

Julius,

Tve.got some soil/GW sampling coming up at Renco next week, probably on the order of 15 samples for 8260B. Would you be able to extend the same pricing (\$85) as the quarterly monitoring? Thanks,

Aaron

From: Julius Carstens [jcarstens@oecusa.com] Sent: Tuesday, February 03, 2009 3:29-PM To: Hook, Aaron Subject: RE: Renco / Regency prices

Aaron,

I have attached a quote that matches the prices you sent. Thank you for letting us update our prices. Let me know if you have any questions.

Thanks Julius

From: Hook, Aaron [mailto:Aaron.Hook@lfr.com] Sent: Tuesday, February 03, 2009 10:00 AM To: Julius Carstens Subject: Renco / Regency prices

Julius,

We've been asked to look at reducing costs for our quarterly monitoring projects. I've received a bid that I'd like to give you a chance to meet or at least respond to. Take a look at these prices and give me a call if you have any questions.

 VOCs
 8260B
 \$85

 VOCs +oxys
 8260B
 \$85

 TPHg
 8015
 GRO
 \$35

 Lactic Acid 300.0
 \$100
 \$100

 Sulfate 300.0
 \$17
 \$35

Thanks,





Aaron Hook LFR-Levine Fricke <u>301 S. Miller St., Ste. 210</u> Santa Maria, CA 93454

07 April 2009

RE: Renco-Investec Investigation

Work Order: 0900880

Dear Client:

Enclosed is an analytical report for the above referenced project. The samples included in this report were received on 30-Mar-09 09:40 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Manual, applicable standard operating-procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report, please do not hesitate to contact the undersigned.

Sincerely,

Lisa Race

Laboratory Manager

307 Roemer Way, Suite 300, Santa Maria, CA 93454

www.oecusa.com

TEL: (805) 922-4772 FAX: (805) 925-3376


LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20-004	Reported:
Santa Maria CA, 93454	Project-Manager: Aaron Hook	07-Apr-09 13:18

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory_ID_	Matrix	Date Sampled	Date Received
SS-IRA/MIP-04-6'	0900880-01	Solid	27-Mar-09 08:10	30-Mar-09 09:40
SS-IRA/MIP-04-10'	0900880-02	Solid	27-Mar=09 08:15	30-Mar-09 09:40
SS-IRA/MIP-05-5'	0900880-03	Solid	27-Mar-09 10:50	30-Mar-09 09:40
SS-IRA/MIP-05-8'	0900880-04	Solid	27-Mar-09 11:30	30-Mar-09 09:40
SS-IRA/MIP-06-3'	0900880-05	Solid	27-Mar-09 14:00	30-Mar-09 09:40
SS-IRA/MIP-07-7.5'	0900880-06	Solid	27-Mar-09 15:25	30-Mar-09 09:40
SS-IRA/MIP-07-7.14'	0900880-07	Solid	27-Mar-09 15:30	30-Mar-09 09:40

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I.FR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial-Assessment 002-08031.20:004-	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP=04=6' 0900880-01 (Solid)

Analyte	Result	Reporting Limit	Units.	Dilution	Batch	Prepared	Analyzed	Method	Note
V-1-tile Descrip Compounds by 171)B							
Volatile Organic Compounds Dy El	ND	0.0050	mg/kg	1	A-904050	06-Apr-09	06-A.pr-09	EPA 8260B	
Dramahangana	ND	0.0050	"			"		.11	
Dromochloromethane		0.0050	п	н	11	н	n	11	
Dromodichloromethere	ND	0.0050	11	11	н	н	н	н	
Promotorm	ND	0.0050	n	11		-11	н	11	
Bromomethane	ND	0.0050	11	н	н	u	п	н	
n Dutulhenzene	ND	0.0050	u.	н	н	tr	41	. "	
sec-Butylbenzene	ND	0.0050	11		и	u I	II.	n	
tert_Butylbenzene	ND	0.0050	"		-11*	-11	11	μ	
Carbon tetrachloride	ND	0.0050	"	н	. 11	IT	u	n	
Chlorobenzene	ND	0.0050	"	н		II	п	и .	
Chloroethane	ND	0.0050	11	н	η	п	Ħ		
2. Chloroethylvinyl ether	ND	0.0050	н	u.	u	n		11	
Chloroform	ND	0.0050	11	11	n	II	н	н	
Chloromethane	ND	0.0050	п	n	I	11	11	п	
2-Chlorotoluene	ND	0.0050	11	II	11	n	·	н	
4-Chlorotoluene	ND	0.0050	"	'n	н	11*	н		
1 2-Dibromo-3-chloropropage	ND	0.0050	11	н	II	n	, II	н	
Dibromochloromethane	ND	0.0050	п	n		n	Ħ	II.	
Dibromomethane	ND	0.0050	n	п	n	11	н	n	
1 2-Dichlorohenzene	ND	0.0050	11	ц	н	11	11	n	
1 3-Dichlorobenzene	ND	0.0050	н	н	н	"	U	n	
1 4-Dichlorobenzene	ND	0.0050	11	п	n	п	н	W	
Dichlorodifluoromethane	ND	0.0050	, n	н	н	11	"	11	
1 1-Dichloroethane	ND	0.0050	11	n .	п	11	"	*1	
1.2-Dichloroethane	ND	0.0050	11	н		н	11	n	
1 1-Dichloroethene	ND	0.0050	п	11	п	n	н	11	
cis_1 2-Dichloroethene	0.0066	0.0050	11	п	н	н	n	μ.	
trans-1 2-Dichloroethene	ND	0.0050	11	n	n	п	11	II.	
1 2-Dichloronronane	ND	0.0050	n	п	н	ħ	н	n	
1 3-Dichloropropane	ND	0.0050	11	"	11	n	н	п	
2 2-Dichloropropane	ND	0.0050	11	11		n	μ	п	
1 1-Dichloropropene	ND	0.0050	11	11	71	u	н	п	
cis-1 3-Dichloropropene	ND	0.0050	п	п	II	п	n	п	
trans-1 3-Dichloropropene	ND	0.0050	11	п	11	n	н	п	
Fthylbenzene	ND	0.0050	11	"	n	. 11	n		
-1-2-Dibromoethane (EDB).	ND	0.0050	"			n	11	n	
Heyachlorobutadiene	ND	0.0050	11	11	11	"	11	n	

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LFR-Levine Fricke 301 S. Miller St., Ste. 210 Santa-Maria CA, 93454		Reported: 07-Apr-09-13:18							
		SS-IR	A/MIP-0)4-6'					
		09008	80-01 (So	olid)					
Analyte	Result	Reporting Limit	_Units_	Dilution	Batch	Prepared_	Analyzed	Method	Notes
Volatile Organic Compounds-by-J	EPA Method 826	0B					_		
Isopropylbenzene	ND	0.0050	 mg/kg	1	A904050	06-Apr-09	06-Apr-09	EPA 8260B	_
4-Isopropyl Toluene	ND	0.0050	н.	n	п	н	n		
Methylene chloride	0.0056	0.0050	"	11	"	н	n	п	O-01
Naphthalene	ND	0.0050	"	н	n	н		н	
n-Propylbenzene	ND	0.0050	н	11	·H	н	н	п	
Styrene	ND	0.0050	"	n	IT	н	н	11	
1,1,1,2-Tetrachloroethane	ND	0.0050		**	u.	11	μ		
1,1,2,2-Tetrachloroethane	ND	0.0050	н	Ħ	н	н	ч		
Tetrachloroethene (PCE)	ND	0.0050	"	11	н		"	н	
Toluene	ND	0.0050	11	11	R.	11	IF		
1,2,3-Trichlorobenzene	ND	0.0050	11	н		11	ų.	n	·
1,2,4-Trichlorobenzene	ND	0.0050	"	n	н	n	н		
1,1,1-Trichloroethane	ND-	0.0050	"	n		n	II.	n	
1,1,2-Trichloroethane	ND	0.0050	n	n	U I	n	н	"	
Trichloroethene (TCE)	0.0073	0.0050	"	u.	н	ti.	н	"	
Trichlorofluoromethane	ND	0.0050	11.	n	n	11-	II	"	
1,2,3-Trichloropropane	ND	0.0050	"	н	u.	н	u.	u	
1,2,4-Trimethylbenzene	ND	0.0050	11	п	n	"	·	u .	
1,3,5-Trimethylbenzene	ND	0.0050	п	н	Π		n	n	
Vinyl chloride	ND	0.0050	ħ	u.	n		п	n	
Xylenes (total)	ND	0.0050	"	n	"	"	#	n	
Surrogate: Dibromofluoromethane		103 %	70-	130	"	"	"	"	
Surrogate: Toluene-d8		98.5 %	70-	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		90.6 %	70-	130	"	"	"	"	

Surrogate: 4-Bromofluorobenzene

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria-CA-93454	Project Manager: Aaron Hook	07-Apr-09 13:18

-SS-IRA/MIP-04-10*

0900880-02 (Solid)

Analyte	Result	Reporting _Limit	-Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds-by FPA Ma	thod-8260B								
Renzene	ND	0.0050	mg/kg	1	A904043	04-Apr-09	04-Apr-09		
Bromohenzene	ND	0.0050	"	"	"	"		10	
Bromochloromethane	ND	0.0050	н	ħ	n	n .		11	
Bromodichloromethane	ND	0.0050	11	"	ч	n	н	n	
Bromoform	ND	-0.0050	п	-11-	II	II	-0.	11	
Bromomethane	ND	0.0050-	II	n	II	II	n	11	
n-Butylbenzene	ND	0.0050	11	ш	η	n	н	H.	
sec-Butylbenzene	ND	0.0050	п	п	II	н	"	n	
tert-Butylbenzene	ND	0.0050	н	u.	II.		"	n	
Carbon tetrachloride	ND	0.0050	81	п	n	11	"	н	
Chlorobenzene	ND	0.0050	п	п	п	n	н	n	
Chloroethane	ND	0.0050	П	п	н	н	н	'n	
² -Chloroethylyinyl ether	ND	0.0050	н	п	н		н	n	
Chloroform	ND	0.0050	11	n	п		н	11	
Chloromethane	ND	0.0050	II	н	н	11	н	п	
2-Chlorotoluene	ND	0.0050	II	н	н	"	н	н	
4-Chlorotoluene	ND	0.0050	n	н	11	n	н	н	
1.2-Dibromo-3-chloropropane	ND	0.0050-	п	н	п	"	, u	н	
Dibromochloromethane	ND	0.0050	n	н	"	II	н	н	
Dibromomethane	ND	0.0050	"	п	n	u	п	н	
1.2-Dichlorobenzene	ND	0:0050	11	H.	н	II	"	н	
1,3-Dichlorobenzene	ND	0.0050	17	n	н	II	n	н	
1.4-Dichlorobenzene	ND	0.0050	**	"	н	n	n	n	
Dichlorodifluoromethane	ND	0.0050	"	u.	n i	II	II	n	
1.1-Dichloroethane	ND	0.0050	n	u		11	η .	а	
1.2-Dichloroethane	ND	0.0050	"	"	It	н	H	Ħ	
1.1-Dichloroethene	ND	0.0050	"	u	11	n	u	"	
cis-1,2-Dichloroethene	0.0077	0.0050	11	n	n	II	н	r	
trans-1,2-Dichloroethene	ND	0.0050		11	n	н	н	n	
1,2-Dichloropropane	ND	0.0050	n	11	н	н	н	n	
1,3-Dichloropropane	ND	0.0050	"	n	н	н	н	n	
2,2-Dichloropropane	ND	0.0050	"	11	п	11	н		
1,1-Dichloropropene	ND	0.0050	n	II	II	II	II		
cis-1,3-Dichloropropene	ND	0.0050	11	u –	11	n	н	н	
trans-1,3-Dichloropropene	ND	0.0050	ti		"	н	n	"	
Ethylbenzene	ND	0.0050	н	u	п	н	II	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	н	"	11	н	"	
Hexachlorobutadiene	ND	0.0050	11	"		"	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301-S. Miller St., Ste210-	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: -Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP-04-10'

0900880-02 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic-Compounds by I	EPA Method 8260	B							
Tsopropylbenzene	ND-	0.0050	mg/kg	1	A904043	04-Apr-09	04=Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.0050	н	n	II	u	н	17	
Methylene chloride	ND	0.0050	п	"	11	н	Ш	11	
Naphthalene	ND	0.0050	н	"	n	н	ш	11	
n-Propylbenzene	ND	0.0050	11	"	"	11-	н	ш	
Styrene	ND	0.0050	tt	n	"	"	н	II	
1,1,1,2-Tetrachloroethane	ND	0.0050	н	"	"	u	н	н	
1,1,2,2-Tetrachloroethane	ND	0.0050	н	"	"	n-	li I	II	
Tetrachloroethene (PCE)	ND	0.0050	н		n	n	II	н	
Toluene	ND-	0.0050	11	"	"	н	II	н	
1,2,3-Trichlorobenzene	ND	0.0050	n	"	71-	n	It	II	
1,2,4-Trichlorobenzene	ND	0.0050	н	"	"	n	n	II	
1,1,1-Trichloroethane	ND	0.0050	11	n	"	n	'π	п	
1,1,2-Trichloroethane	ND	0.0050	11	11	71	. H	n	н	
Trichloroethene (TCE)	0.012	0.0050	"	".	"	н	N	π	
Trichlorofluoromethane	ND	0.0050	11	н	"	н	11	n	
1,2,3-Trichloropropane	ND	0.0050	11	"	n	n	11	11	
1,2,4-Trimethylbenzene	ND	0.0050	n	"	11	n	, n	11	
1,3,5-Trimethylbenzene	ND	0.0050	н	"	"	π	n	11	
Vinyl chloride	ND	0.0050	"	11	"	н	n		
Xylenes (total)	ND	0.0050	"	11	-11-	11	"	"	
Surrogate: Dibromofluoromethane		101 %	70	130	"	"	"	"	
Surrogate: Toluene-d8		97.0 %	· 70	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		94.7 %	70-,	130	n	"	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP-05-5'

-0900880-03 (Solid)

Analyte_	Result	Reporting Limit	Units	Dilution	⁻ Batch	Prepared	Analyzed	Method	Notes
-Volatile Organic Compounds by	EPA Method-8260B								
Benzene	ND	0.0050	mg/kg-	1	A904043	04-Apr-09	04-Apr-09	-EPA 8260B	
Bromobenzene	ND	0.0050	"	"	"		"	H H	
Bromochloromethane	ND	0.0050	"	n	н	н	ш	н .	
Bromodichloromethane	ND	0.0050	"	п	"	н	n	н	
Bromoform	ND	0.0050	л н.	п	н	н	н	n	
Bromomethane	ND	0.0050	п	н	u	n	п	и	
n-Butylbenzene	ND	0.0050	n	li li	II	μ	н		
sec-Butylbenzene	ND	0.0050	n	li	н	"	п	н	
tert-Butylbenzene	ND	0.0050	ना	ц	"	н	п	n	
Carbon tetrachloride	ND	0.0050	If	n	· n	'n	н	н	
Chlorobenzene	ND	0.0050	11	11	н	н	ц	н	
Chloroethane	ND	0.0050	T	п	"	11	п	п	
2-Chloroethylvinyl ether	ND	0.0050	"	n	u	п	н	n	
Chloroform	ND	0.0050	н	"	u	н	п	п	
Chloromethane	ND	0.0050	н	"	u	н	н	н	
2-Chlorotoluene	ND	0.0050	**	п	n	11	'II	н	
4-Chlorotoluene	ND	0.0050	"	н	п	п		п	
1,2-Dibromo-3-chloropropane	ND	0.0050	"		н	п.	. 11	n	
Dibromochloromethane	ND	0.0050	"	n		-11	н	н.	
Dibromomethane	ND	0.0050	п	n	u	h		н	
1,2-Dichlorobenzene	ND	0.0050	u	п	n	n		n	
1,3-Dichlorobenzene	ND	0.0050		· 11	"	н		11	
1,4-Dichlorobenzene	ND	0.0050	н	н		II	11	н	
Dichlorodifluoromethane	ND	0.0050		· #		"	н	ш	
1,1-Dichloroethane	ND	0.0050	n	"		11		. "	
1,2-Dichloroethane	ND	0.0050		ш	"		17	n	
1,1-Dichloroethene	ND	0.0050	"	u	"	u	n	н	
cis-1,2-Dichloroethene	ND	0.0050		11	п		п	н	
trans-1,2-Dichloroethene	ND	0.0050	n	n	н	11	н	"	
1,2-Dichloropropane	ND	0.0050	"	н	n		n		
1,3-Dichloropropane	ND	0.0050	n	n	11	"	"	ч	
2,2-Dichloropropane	ND	0.0050	11	n	п	u	u.	I7	
1,1-Dichloropropene	ND	0.0050	n	n	n	u	н	Ħ	
cis-1,3-Dichloropropene	ND	0.0050	H	11	n	n	11	u	
trans-1,3-Dichloropropene	ND	0.0050	н	11	II	н	Ħ	н	
Ethylbenzene	ND	0.0050	"	и	"	H	Ħ	n	
1,2-Dibromoethane (EDB)	ND	0.0050		R		u	п	Π	
Hexachlorobutadiene	ND	0.0050	"	n	II	н	п	u.	

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Analyte

Isopropylbenzene

Oilfield Environmental and Compliance, INC.

LFR-Levine Fricke_	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP-05-5'

0900880-03-(Solid) Reporting -Limit Result Units Dilution Batch Prepared Analyzed Volatile Organic Compounds by EPA Method 8260B ND 0:0050 mg/kg 1 A904043 04-Apr-09 04-Apr-09 EPA 8260B

4-Isopropyl Toluene	ND	0.0050		"	"	'n	u u	n	
Methylene chloride	ND	0.0050	17	R	. "	"	n	Ħ	
Naphthalene	ND	0.0050	**	u	"	"	н	Ħ	
n-Propylbenzene	ND	0.0050	17	n	n	Ħ	11	"	
Styrene	ND	0.0050	**	"	"	"	n	Ħ	
1,1,1,2-Tetrachloroethane	ND	0.0050	**	II	II	"	11	11	
1,1,2,2-Tetrachloroethane	ND	0.0050	**	n	n	".	11	· 11	
Tetrachloroethene (PCE)	ND	0.0050	17	"	n	"	W	'n	
Toluene	ND	0.0050	17	ur.	ч		н	11.	
1,2,3-Trichlorobenzene	ND	0.0050	17		n		11	ĸ	
1,2,4-Trichlorobenzene	ND	0.0050	17	н	n	"	11	11	
1,1,1-Trichloroethane	ND	0.0050	17	н	H		н	II	
1,1,2-Trichloroethane	ND	0:0050	17	"	11	• •	u	"	
Trichloroethene (TCE)	ND	0.0050	17	п	N	"	н	и.	
Trichlorofluoromethane	ND	0.0050	17	н	n	"	18	II .	
1,2,3-Trichloropropane	ND	0.0050	**	н	11	n	n	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	н	п	**	17	n	
1,3,5-Trimethylbenzene	ND	0.0050	17	н	"	**	11	ti ti	
Vinyl chloride	ND	0.0050	17	п	n	н	11	II	
Xylenes (total)	ND	0.0050	II	н	n	H	11	"	
Surrogate: Dibromofluoromethane		107 %	70-1	30	#	"	"	"	
Surrogate: Toluene-d8		96.0 %	70-1	30	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		95.6 %	70-1	30	"	"	"	"	

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Method

Notes



R-Levine Fricke	Project: Renco-Investec Investigation	
I S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
ata-Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP-05-8'

0900880-04 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organic Compounds-by EPA	Method 8260B								
Benzene	ND	0.0050	mg/kg	1	A904043	04-Apr-09	04-Apr-09	EPA 8260B	
Bromobenzene	ND	0.0050	н	"	n	"	"	u	
Bromochloromethane	ND	0.0050	"	н	II	"	"	u u	
Bromodichloromethane	ND	0.0050	n	II	n	11	ıt	n	
Bromoform	ND	0.0050	Ħ	п	17	11	II	n	
Bromomethane	ND	0.0050	n	н	"	-11-	"	п	
n-Butylbenzene	ND	0.0050	"	н	n	II	н	n	
sec-Butylbenzene	ND	0.0050	"	u II	н	n	н	I	
tert-Butylbenzene	ND	0.0050	"	n	n	н	н	n ,	
Carbon tetrachloride	ND	0.0050	п	n	n	11.	н	n	
Chlorobenzene	ND	0.0050	11	n	II	-11	u	n	
Chloroethane	ND	0.0050	п	11	n	n	"	n	
2-Chloroethylvinyl ether	ND	0.0050	н	n	11	n	11	17	
Chloroform	ND ⁻	0.0050	. H	n	11	n .	"	Ħ	
Chloromethane	ND	0.0050	h	"	11	ti	11	"	
2-Chlorotoluene	ND	0.0050	н	"	"	n	n	er.	
4-Chlorotoluene	ND	0.0050	n	n	н	"	n	17	
1,2-Dibromo-3-chloropropane	ND	0.0050	п	"	I	".	"	n	
Dibromochloromethane	ND	0.0050	n.	"	н	н -	11	IF	
Dibromomethane	ND	0.0050	11	W	IF	II	W.	n	
1,2-Dichlorobenzene	ND	0.0050	n	17		II.		'n	
1,3-Dichlorobenzene	ND	0.0050	"	'n	17	n		n	
1,4-Dichlorobenzene	ND	0.0050	n	п	11	н		u,	
Dichlorodifluoromethane	ND	0.0050	н	n	Ħ	"	W.	"	
1,1-Dichloroethane	ND	0.0050	п		n	tt.	U II	11	
1,2-Dichloroethane	ND	0.0050	n	н	"	"	"	n	
1,1-Dichloroethene	ND	0.0050	n	u	U	11	u –	11	
cis-1,2-Dichloroethene	ND	0.0050	'n	"	н	u –	U.	и .	
trans-1,2-Dichloroethene	ND	0.0050	IT	11	н	н	н	н	
1,2-Dichloropropane	ND	0.0050	11	11	н	н	"	"	
1,3-Dichloropropane	ND	0.0050	n	"	u.	n	u .		
2,2-Dichloropropane	ND	0.0050	Π	п	п	n	n	II.	
1,1-Dichloropropene	ND	0.0050	Tf	n	н	n	11		
cis-1,3-Dichloropropene	ND	0.0050	п	n	11	"	11		
trans-1,3-Dichloropropene	ND	0.0050	п	n		11	n	n	
Ethylbenzene	ND	0.0050	п	n	"	11	11	n	
1,2-Dibromoethane (EDB)	<u>ND</u>	0.0050	n	"	"	Ħ	11	n	
Hexachlorobutadiene	ND	0.0050	п	"	"	n	11	н	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:-
Santa Maria CA, 93454	Project Manager: Aaron Hook	.07-Apr-09-13:18

SS-IRA/MIP-05-8' 0900880-04 (Solid)

			<u>`</u>	<u> </u>					
Analyte-	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	-Method	Note
- <u> </u>									
Volatile Organic Compounds by I	EPA Method 8260	B							
Isopropylbenzene	ND	0:0050	mg/kg	1	A904043	04-Apr-09	04-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.0050	11	н	n		u.	н	
Methylene chloride	ND	0.0050	11	IT		u	u	п	
Naphthalene	ND	0.0050	11	n	I	н		н	
n-Propylbenzene	ND	0.0050	"	I	n	IF.	н	n	
Styrene	ND	0.0050	n	II	v	н	н	н	
1,1,1,2-Tetrachloroethane	ND	0.0050	11-	II	"		- 17-	u	
1,1,2,2-Tetrachloroethane	ND	0.0050	н	"	"	"	"	u	
Tetrachloroethene (PCE)	ND	0.0050	17	II		н	n	u	
Toluene	ND	0.0050	"	I		n	n	17	
1,2,3-Trichlorobenzene	ND	0.0050	17	I		н	n	н	
1,2,4-Trichlorobenzene	ND	0.0050	11	II		IT	n	15	
1,1,1-Trichloroethane	ND	0.0050	11	н		11	n	н	
1,1,2-Trichloroethane	ND	0.0050	11	n	Ħ	11	n	н	
Trichloroethene (TCE)	0.028	0.0050	n	n	н	н	II	u	
Trichlorofluoromethane	ND	0.0050	"	n	н	н	н	11	
1,2,3-Trichloropropane	ND	0.0050		н	U.	-11	н	I	
1,2,4-Trimethylbenzene	ND	0.0050	11	н	н	ч.	н	u	
1,3,5-Trimethylbenzene	ND	0.0050	11	н	н	U II	"	I	
Vinyl chloride	ND	0.0050	11	н	н	"	ır	n	
Xylenes (total)	ND	0.0050	"	H	н	II	17	n	
Surrogate: Dibromofluoromethane		107 %	70-1	130	#	"	п	"	
Surrogate: Toluene-d8		95.0 %	70-1	130	"	"	"	"	
Surrogate · 4-Bromofluorobenzene		93.3 %	70-	130	"	"	"	"	

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Oilfield Environmental and Compliance, INC.

LFR-Levine Fricke	Project: Renco-Investee Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20:004	Reported:
Santa Maria CA, 93454	Project Manager:_Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP-06=3'

'0900880-05 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	-Notes-
-Volatile Organic Compounds by EPA	-Method 8260B								
Benzene	ND	0.00 5 0	mg/kg	1	A-904043	04-Apr-09		EPA 8260B	
Bromobenzene	ND	0.0050	"	"	н	"		11	
Bromochloromethane	ND	0.0050	н	н	n	"	н	11	
Bromodichloromethane	ND	0.0050	н	н	11	n	n		
Bromoform	ND	0.0050	π	н	11	н	11	11	
Bromomethane	ND	0.0050	"	11	"		н	n	
n-Butylbenzene	ND	0.0050	"	"	H.	н	н	н	
sec-Butylbenzene	ND	0.0050	n	n	11	n	n	н	
tert-Butylbenzene	ND	0.0050	н	"	"	н	п	H	
Carbon tetrachloride	ND	0.0050	н	. "	11	н	н	н	
Chlorobenzene	ND	0.0050	11	"	Ħ	н	n	ч	
Chloroethane	ND	0.0050	11	"	"	n	n	n	
2-Chloroethylvinyl ether	ND	0.0050	11	11	n	n	н	п	
Chloroform	ND	0.0050	n	11	ıt	n	н	н	
Chloromethane	ND	0.0050	п	u	н	Ħ	п	11	
2-Chlorotoluene	ND	0.0050	п	n.		н	п	"	
4-Chlorotoluene	ND	0.0050	п .	n		-11	н	11-	
1,2-Dibromo-3-chloropropane	ND	0.0050	11	11	n	μ.	n		
Dibromochloromethane	ND	0.0050	.11		n	11		u.	
Dibromomethane	ND	0.0050	н		n		н	n	
1,2-Dichlorobenzene	ND	0.0050	11	"	u .	"	н	n	
1,3-Dichlorobenzene	ND	0.0050	"	n	11	n	u.	n	
1,4-Dichlorobenzene	ND	0.0050	**	"	n	n	n	н	
Dichlorodifluoromethane	ND	0.0050	ır	n	н	н	"	"	
1,1-Dichloroethane	ND	0.0050	TI	н	н	н		н	
1,2-Dichloroethane	ND	0.0050	"	n	H	Ħ	n		
1,1-Dichloroethene	ND	0.0050	17	It	11	n	п	n	
cis-1,2-Dichloroethene	ND	0.0050	"	n	н	n	n	н	
trans-1,2-Dichloroethene	ND	0.0050	"	Ħ		n	n	н	
1,2-Dichloropropane	ND	0.0050	"	н	n	n	u.		
1,3-Dichloropropane	ND	0.0050	11	н	n	II	11		
2,2-Dichloropropane	ND	0.0050	n	"	n	II	n	п	
1,1-Dichloropropene	ND	0.0050	п	11	11	"	11	н	
cis-1,3-Dichloropropene	ND	0.0050	n	n	11	n	н	11	
trans-1,3-Dichloropropene	ND	0.0050	n	н	11	II.	n	n	
Ethylbenzene	ND	0.0050	H	11	n	"	ı	н	
1,2-Dibromoethane (EDB)	ND	0.0050	n			11	n	n	
Hexachlorobutadiene	ND	0.0050	n	n	u	n	n .	IT	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number:=Remedial Assessment 002=08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP-06-3'

0900880=05 (Solid)-

Analyte	Result	-Reporting Limit	Units	Dilution	Batch	Prepared	- Analyzed	Method	Notes
Volatile Organic Compounds by I	EPA Method 8260	B					v		
-Isopropyibenzene-	ND	-0:0050	mg/kg	1	A904043	04-Apr-09	04-Apr-09	-EPA-8260B	
4-Isopropyl Toluene	ND	0.0050	н	"	н	н	"	н	
Methylene chloride	ND	0.0050	11	11	"	II	H	n	
Naphthalene	ND	0.0050	11	n	n	н	n	н	
n-Propylbenzene	ND	0.0050	н	н	W.	н	-11-	-01-	
Styrene	ND	0.0050	11	н	11	н	- 11	п .	
1,1,1,2-Tetrachloroethane	ND	.0.0050	н	· µ	"	п	n	11	
1,1,2,2-Tetrachloroethane	ND	0.0050	н	н	n	п	'n	н	
Tetrachloroethene (PCE)	ND	0.0050	н	ır	W.	н	n	u	
Toluene	ND	0.0050	н	n	11	n	n	11	
1,2,3-Trichlorobenzene	ND	0.0050		n	n	-16-	11	п	
1,2,4-Trichlorobenzene	ND	0.0050	n	n	11	н	н -	н	
1,1,1-Trichloroethane	ND	0.0050	<u>,</u> и	II	n	. 11	н	u .	
1,1,2-Trichloroethane	ND	0.0050	н	н	"	н	N	н	
Trichloroethene (TCE)	ND	0.0050	"	н	н	II	n	п	
Trichlorofluoromethane	ND	0.0050	и	Н.	.u.	н	17	-u	
1,2,3-Trichloropropane	ND	0.0050	н	н	"	11	Ħ	н	
1,2,4-Trimethylbenzene	ND	0.0050	н	н	"	н	. n	11	•
1,3,5-Trimethylbenzene	ND	0.0050	н	"	"	TT I	Ħ	н	
Vinyl chloride	ND	0.0050	"	н	"	п	n	u .	
Xylenes (total)	ND	0.0050	11	н	"	n	11	"	
Surrogate: Dibromofluoromethane		102 %	70-	130	"	"	"	"	
Surrogate: Toluene-d8		96.8 %	70-	130	"	"	"	"	
- Surrogate: 4-Bromofluorobenzene		91.7 %	70-	130	"	n	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number:-Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	- 07-Apr-09 13:18-

-SS-IRA/MIP-07-7.5' 0900880-06 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	-Batch	Prepared	Analyzed	Method	Note
Volatile Organic Compounds by F	 P &=Method 8760	B							
Penzene:	-ND	0.0050	mg/kg	1	A:904043	04-Apr-09	04-Apr-09	EPA 8260B	
Bromobenzene	ND	0.0050	"	н	11	11		"	
Bromochloromethane	ND	0.0050	н	u.	n	11	u	н	
Bromodichloromethane	ND	0.0050	11	н	u	н	n	н	
Bromoform	ND	0.0050	"	u.	н	н	n	н	
Bromomethane	ND	0.0050		н	h	н	"	н	
p. Butylbenzene	ND	0.0050	н	11	H.	н		н	
n-Dutylbenzene	ND	0.0050	It	17	н	H	I	n	
sec-Duty Ibenzene	ND	0.0050	н	н	11	н	u	н	
Carbon tetrachleride	ND	0.0050	-11	н	н	ų	и		
Chlorobenzene	ND	0.0050	11.	n	н	и	II	u .	
Chloroethane	ND	0.0050	н	u.	11	н	II	u .	
2-Chloroethylvinyl ether	ND	0.0050	н		n	u –	n	н	
Chloroform	ND	0.0050	"	11	н	It	II	n	
Chloromethane	ND	0.0050	U	н	H	"	н	н	
2. Chlorotoluene	ND	0.0050	н	н	u.	н	и	п	
4-Chlorotoluene	ND	0.0050-	11-	II	н	· 11	"	п	
1 2-Dibromo-3-chloropropane-	ND	0.0050	п	п	н	U.	н	н	
Dibromochloromethane	ND	0.0050	н	п	н		н	*	
Dibromomethane	ND	0.0050		Ħ	н		n	н	
1 2-Dichlorohenzene	ND	0.0050	11	н	n	н	n	u	
1.3-Dichlorobenzene	ND	0.0050	11	n	н	μ	н		
1,4-Dichlorobenzene	ND	0.0050	u.	n	н	н	н	n	
Dichlorodifluoromethane	ND	0.0050	11	.11	Ħ	н	11	n	
1 1-Dichloroethane	ND	0.0050	**	н	"		"	n	
1.2-Dichloroethane	ND	0.0050	"	н	11	н	"	17	
1 1-Dichloroethene	ND	0.0050	Ut-	н	n	н	п	н	
cis-1 2-Dichloroethene	ND	0.0050	It	н	н	н	u	н	
trans-1,2 Dichloroethene	ND	0.0050	11	11	п	н	7	11	
1 2-Dichloronronane	ND	0.0050	п	u	'n	н	u	u	
1 3-Dichloropropane	ND	0.0050	, t i	u	н	"	п	u	
2 2-Dichloropropage	ND	0.0050	Ħ	II	11	u	н	11	
1 1-Dichloropropene	ND	0.0050	11	u	n	II	н	n	
cise 1 3-Dichloropropene	ND	0.0050	"	н	11	Ħ		н	
trans_1_3_Dichloropropene		0.0050	"	u		н	н	п	
Ethylhenzene		0.0050	11	"	н	н	11	n	
1 2-Dibromoethane (FDR)		0.0050		n	17	n	п		
Lavachlorohutadiene		0.0050	- 11		"	"	11		

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 ⁻ S. Miller_St.,-Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa-Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

SS-IRA/MIP=07-7.5'

0900880-06 (Solid)

		Reporting							
Analyte	Result	Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	-Notes
Volatile Organic Compounds by I	PA Method-8260)B							
Isopropylbenzene	ND	-0.0050	.mg/kg	1	A904043	04-Apr-09	04-Apr-09	EPA 8260B	
4-Isopropyl Toluene	-NĐ	0.0050	"	Ш	"	u	"	11-	
Methylene chloride	ND	0.0050	n	"	"	н	"		
Naphthalene	ND	0.0050	13	"	"	11	II	n	
n-Propylbenzene	ND	0.0050	"	n	II	п	н	Ħ	
Styrene	ND	0.0050	11	II	11-	н	u	"	
1,1,1,2-Tetrachloroethane	ND	0.0050	- 11	n	II	"		н	
1,1,2,2-Tetrachloroethane	ND	0.0050		II.	n	11	u	н	
Tetrachloroethene (PCE)	ND	0.0050	Ħ	n	n	"	н	"	
Toluene	ND	0.0050	11	11	n	"	n	11	
1,2,3-Trichlorobenzene	ND	0.0050	n	11	n	11	n	п	
1,2,4-Trichlorobenzene	ND	0.0050	н	n	II	"	п	n	
1,1,1-Trichloroethane	-ND	0.0050	н	'n	11	11	. "		
1,1,2-Trichloroethane	ND	0.0050	н	н	"	"	н	'n	
Trichloroethene (TCE)	ND	0.0050	n	n	u.	u.	н		
Trichlorofluoromethane	ND	0.0050	"	H	u	n	h.	11	
1,2,3-Trichloropropane	ND	0.0050	п	"	u –	ti -	H	n	
1,2,4-Trimethylbenzene	ND	-0.0050	-11-	u.	II	ור	. п	u.	
1,3,5-Trimethylbenzene	ND	0.0050	п	n	Ħ	п	-11	n	
Vinyl chloride	ND	0.0050	п	11	Ir	н	11		
Xylenes (total)	ND	0.0050	"	"	н	н	"	. "	
Surrogate: Dibromofluoromethane		103 %	70-	130	"	"	"	"	
Surrogate: Toluene-d8		96.9 %	70-	130	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		94.0 %	70-	130	"	"	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller-St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
- Santa Maria CA, 93454	Project Manager: Aaron-Hook	07-Apr-09 13:18

SS-IRA/MIP-07-7.14'

0900880-07 (Solid)---

Analyte Result	Reporting Limit	Units	Dilution	Batch	Prepared	-Analyzed	Method	Notes
Volatile-Organic-Compounds by EPA Method 82	260B							
Benzene ND	0.0050	mg/kg	1	A904043	04-Apr=09-	04-Apr-09	EPA 8260B	
Bromobenzene ND	0.0050		"	u.	n	17	11	
Bromochloromethane ND	0.0050	"	II	н	n	11	n	
Bromodichloromethane ND	0.0050	"	н	"	н	н		
Bromoform. ND	0.0050	"	н	н	u.	n		
Bromomethane ND	0.0050	"	. 11	"	n	n	n	
n-Butylbenzene ND	0.0050	"	"	u –	н	n	n	
sec-Butylbenzene ND	0.0050	"	"	n	n	n	11	
tert-Butylbenzene ND	0.0050	"	"	n	n	n	"	
Carbon tetrachloride ND	0.0050	II.	II	I	n .	n'	п	
Chlorobenzene ND	0.0050	**	II	II	n	π	n	
Chloroethane ND	0.0050	It	11	II	n	n	"	
2-Chloroethylvinyl ether ND	0.0050	**	II	II	n	n	п	
Chloroform ND	0.0050	**	II	u	п	n	н	
Chloromethane ND	0.0050	"	n	u	n	н	n	
2-Chlorotoluene ND	0.0050	17	n	н	n	Ħ	н	
4-Chlorotoluene ND	0.0050	-11	π	н	н	n	н	
1.2-Dibromo-3-chloropropane ND	0.0050	· H	ti	н	п.	n	н	
Dibromochloromethane ND	0.0050	"	n	н	n	п	u	
Dibromomethane ND	0.0050	n	n	н	n	n	н	
1.2-Dichlorobenzene ND	0.0050	"	11	n	u	n	n	
1.3-Dichlorobenzene ND	0.0050	"	"	h	"	n	н	
1.4-Dichlorobenzene ND	0.0050	"	"	11	n	11	u	
Dichlorodifluoromethane ND	0.0050	"	U II	II	m	Ħ	н	
1.1-Dichloroethane ND	0.0050	"	"	n	u	n	. "	
1.2-Dichloroethane ND	0.0050	"	"	n	n	n	u	
1.1-Dichloroethene ND	0.0050	"	"	Ħ	n	n	IT	
cis-1.2-Dichloroethene ND	0.0050	"	н	11	n	π	11	
trans-1 2-Dichloroethene ND	0.0050	n	U.	n	н	n	н	
1 2-Dichloropropage ND	0.0050	n	и	n	n	n	н	
1 3-Dichloropropage ND	0.0050	Ħ	"	н	· n	n	u	
2.2-Dichloropropane ND	0.0050		II	н	n	н	II	
1.1-Dichloropropene ND	0.0050	"	n	н		II	н	
cis-1 3-Dichloropropene ND	0.0050	Ħ	11	н	ŧ	н	н	
trans-1 3-Dichloropropene ND	0.0050	н	n		н	н	н	
Ethylhenzene ND	0.0050	"	"		"	н	н	
1 2-Dibromoethane (EDB) ND	0.0050	**	п		n	п	н	
Hexachlorobutadiene ND	0.0050	Ħ	IT	11	11	n	н	•

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LFR-Levine Fricke	Project: Renco-Investec-Investigation	
-301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	-07-Apr-09 13:18

SS-IRA/MIP-07-7.14' 0900880-07⁻(Solid)

Analyte	Result	Reporting Limit	Units	-Dilution	Batch	Prepared	Analyzed	Method-	Notes
Volatile Organic Compounds by I	EPA-Method 8260)B							
Isopropylbenzene.	ND	0.0050	mg/kg	1	A904043	04-Apr-09	04-Apr-09	EPA 8260B	
4-Isopropyl Toluene	ND	0.0050	-11-		н	n		н	
Methylene chloride	ND	0.0050	**	II	U I	n	ti -	n	
Naphthalene	ND	0.0050	**	"	н	н	II.		
n-Propylbenzene	ND	0:0050	"	n	и	n	"	n	
Styrene	ND	0.0050	"	н		n	π	u.	
1,1,1,2-Tetrachloroethane	ND	0.0050	н.	н	n	n	н	н	
1,1,2,2-Tetrachloroethane	ND	0.0050	n	n	"	n	н		
Tetrachloroethene (PCE)	ND	0.0050	U.	н	U	"	п		
Toluene	ND	0.0050	n	u	π	n	II	u.	
1,2,3-Trichlorobenzene	ND	0.0050	n	n	n	п	н	п	
1,2,4-Trichlorobenzene	ND	0.0050	11	IF	п	н	II	н	
1,1,1-Trichloroethane	ND	0.0050	H	н	n	'n	u	n	
1,1,2-Trichloroethane	ND	0.0050		и	"	'n		n	
Trichloroethene-(-TCE)	ND	0.0050	н	п	"	n	n	11	
Trichlorofluoromethane	ND	0.0050	11	n	n	n	н	11	
1,2,3-Trichloropropane	ND	0.0050	"	11-	11	11	11	IF	
1,2,4-Trimethylbenzene	ND	0.0050	"	н	н	и.	н	-11	
1,3,5-Trimethylbenzene	ND	0.0050	u –	н	11	"	н	II	
Vinyl chloride	ND	0.0050	"	π	11	"	IT	п	
Xylenes (total)	ND	0.0050		11	μ	u.	u	17	
Surrogate: Dibromofluoromethane		98.2 %	70	130	"	"	"	"	
Surrogate: Toluene-d8		96.3 %	70	130	"	"	"	v	
Surrogate: 4-Bromofluorobenzene		91.7 %	70	130	"	"	"	"	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A904043 - EPA 5030B VOCGCM	(S	_								
Blank (A904043-BLK1)				Prepared	& Analyze	d: 04-Api	-09			
Benzene	ND	0.0050	mg/kg			· · · · ·				
Bromobenzene	ND	0.0050	н							
Bromochloromethane	ND	0.0050								
Bromodichloromethane	ND	0.0050	n							
Bromoform	ND	0.0050	II							
Bromomethane	ND	0.0050	u							
n-Butylbenzene	ND	0.0050	II							
sec-Butylbenzene	ND	0.0050	n							
tert-Butylbenzene	ND	0.0050	n							
Carbon tetrachloride	ND	0.0050								
Chlorobenzene	ND	0.0050	U.							
Chloroethane	ND	0.0050								
2-Chloroethylvinyl ether	ND	0.0050	U I							
Chloroform	ND	0.0050	n							
Chloromethane	ND	0.0050	"							
2-Chlorotoluene	ND	0.0050	n							
4-Chlorotoluene	ND	0.0050								
1,2-Dibromo-3-chloropropane	ND	0.0050	н							
Dibromochloromethane	ND	0.0050	н				,			
Dibromomethane	ND	0.0050	11							
1,2-Dichlorobenzene	ND	0.0050	n							
1,3-Dichlorobenzene	ND	0.0050	"							
1,4-Dichlorobenzene	ND	0.0050	11							
Dichlorodifluoromethane	ND	0.0050	н							
1,1-Dichloroethane	ND	0.0050	11							
1,2-Dichloroethane	ND	0.0050	"							
1,1-Dichloroethene	ND	0.0050	н							
cis-1,2-Dichloroethene	ND	0.0050	n							
trans-1,2-Dichloroethene	ND	0.0050	11							
1,2-Dichloropropane	ND	0.0050	n							
1,3-Dichloropropane	ND	0.0050	u							
2,2-Dichloropropane	ND	0.0050	u .							
1,1-Dichloropropene	ND	0.0050	11							
cis-1,3-Dichloropropene	ND	0.0050								
trans-1,3-Dichloropropene	ND	0.0050	н			•				
Ethylbenzene	ND	0.0050								
1,2-Dibromoethane (EDB)	ND	0.0050	n							
Hexachlorobutadiene	ND	0.0050	n							
Isopropylbenzene	ND	0.0050	н						·	
4-Isopropyl Toluene	ND	0.0050	н							

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210-	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD -Limit	Notes -
Batch A904043 - EPA-5030B VOCGCI	MS.									
Blank (A904043-BLK1)				Prepared	& Analyze	:d: 04-Api	-09			
Methylene chloride	ND	0.0050	mg/kg							
Naphthalene	ND	0.0050	11							
n-Propylbenzene	ND	0.0050	H							
Styrene	ND	0.0050	IT						,	
1,1,1,2-Tetrachloroethane	ND	0.0050	II							
1,1,2,2-Tetrachloroethane	ND	0.0050	11							
Tetrachloroethene (PCE)	ND	0.0050	н							
Toluene	ND	0.0050	- 11							
1,2,3-Trichlorobenzene	ND	0.0050	11							
1,2,4-Trichlorobenzene	ND	0.0050	n							
1,1,1-Trichloroethane	ND	0.0050	n							
1,1,2-Trichloroethane	ND	0:0050	н							
Trichloroethene (TCE)	ND	0.0050	"							
Trichlorofluoromethane	ND	0.0050	11							
1.2.3-Trichloropropane	ND	0.0050	"							
1.2.4-Trimethylbenzene	ND	0.0050	If							
1.3.5-Trimethylbenzene	ND	0.0050	н							
Vinyl chloride	ND	0.0050	n							
Xylenes (total)	ND	0.0050	IF				,			
Surrogate: Dibromofluoromethane	0.102		"	0.100		102	70-130			
Surrogate: Toluene-d8	0.0 9 68		"	0.100		96.8	70-130			
Surrogate: 4-Bromofluorobenzene	0.0950		"	0.100		95.0	70-130		,	
Blank (A904043-BLK2)				Prepared	& Analyze	d: 04-Apr	-09			
Benzene	ND	0.0050	mg/kg							
Bromobenzene	ND	0.0050								
Bromochloromethane	ND	0.0050	н							
Bromodichloromethane	ND	0.0050	"							
Bromoform	ND	0.0050	н							
Bromomethane	ND	0.0050	"							
n-Butylbenzene	ND	0.0050	"							
sec-Butylbenzene	ND	0.0050	II							
tert-Butylbenzene	ND	0.0050	"							
Carbon tetrachloride	ND	0.0050	"							
Chlorobenzene	ND	0.0050	"							
Chloroethane	ND	0.0050	U II							
2-Chloroethylvinyl ether	ND	0.0050	н							
Chloroform	ND	0.0050	н							
Chloromethane	ND	0.0050	н							
2-Chlorotoluene	_ND	0.0050	"	1						
4-Chlorotoluene	ND	0.0050	"			_				

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

Volatile Organic Compounds by EPA Method 8260B - Quality Control

	-Result	Reporting Limit	Units	Spike Level	Source Result	-%REC	-%REC ⁻ Limits	-RPD	RPD Limit	Notes_
Batch A904043 - EPA 5030B VOCGO	CMS									
Blank (A904043-BLK2)				Prepared	& Analyze	ed: 04-Api	=09			
1,2-Dibromo-3-chloropropane	ND	0.0050	mg/kg			1				
Dibromochloromethane	ND	0.0050	11							
Dibromomethane	ND	0.0050	u							
1,2-Dichlorobenzene	ND	-0.0050	11							
1,3-Dichlorobenzene	ND	0.0050	11							
1,4-Dichlorobenzene	ND	0.0050	11		,					
Dichlorodifluoromethane	ND	0.0050	11							
1,1-Dichloroethane	ND	0.0050	"							
1,2-Dichloroethane	ND	0.0050	11							
1,1-Dichloroethene	ND	0.0050	n					х		
cis-1,2-Dichloroethene	ND	0.0050	11							
trans-1,2-Dichloroethene	ND	0.0050	11							
1,2-Dichloropropane	ND	0.0050	"							
1,3-Dichloropropane	ND	0.0050	n							
2,2-Dichloropropane	ND	0.0050	n							
1,1-Dichloropropene	ND	0.0050	n							
cis-1,3-Dichloropropene	ND	0.0050	u							
trans-1,3-Dichloropropene	ND	0.0050	n							
Ethylbenzene	ND	0.0050	11				•			
1,2-Dibromoethane (EDB)	ND	0.0050	"	'						
Hexachlorobutadiene	ND	0.0050	11							
Isopropylbenzene	ND	0.0050	·							
4-Isopropyl Toluene	ND	0.0050	11		•					
Methylene chloride	ND	0.0050	11							
Naphthalene	ND	0.0050	"							
n-Propylbenzene	ND	0.0050	It							
Styrene	ND	0.0050	n							
1,1,1,2-Tetrachloroethane	ND	0.0050	n							
1,1,2,2-Tetrachloroethane	ND	0.0050	n				•			
Tetrachloroethene (PCE)	ND	0.0050	n							
Toluene	ND	0.0050	II.							
1,2,3-Trichlorobenzene	ND	0.0050	"							
1,2,4-Trichlorobenzene	ND	0.0050	n							
1,1,1-Trichloroethane	ND	0.0050	и							
1,1,2-Trichloroethane	ND	0.0050	н							
Trichloroethene (TCE)	ND	0.0050	н							
Trichlorofluoromethane	ND	0.0050	n							
1,2,3-Trichloropropane	ND	0.0050	n							
1,2,4-Trimethylbenzene	ND	0.0050	T							
-1,3,5-Trimethylbenzene	ND	0.0050	N							

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria-CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:1-8

Volatile Organic Compounds by EPA Method 8260B - Quality-Control

	Popult	Reporting	I-Inite	-Spike	Source	WREC	%REC		RPD	
		Dimit	01113				Linus	KPD		Notes
Batch A904043 - EPA 5030B VOC	CGCMS									
Blank (A904043-BLK2)				Prepared & Analyzed: 04-Apr-09						
Vinyl chloride	ND	0.0050	mg/kg							
Xylenes (total)	ND	0.0050	"		•					
Surrogate: Dibromofluoromethane	0.0971		"	0.100		97.1	70-130			
Surrogate:_Toluene-d8	0.0976		n	0.100		97.6	70-130			
Surrogate: 4-Bromofluorobenzene	0.0944		n.	0.100		94.4	70-130			
LCS (A904043-BS1)				Prepared	& Analyze	d: 04-Ap	r-09			
Benzene	0.102	0.0050	mg/kg	0.100		102	70-130			
Chlorobenzene	0.100	0.0050	"	0.100		100	70-130			
1,1-Dichloroethene	0.102	0:0050	Π	0.100		102	70-130			
Toluene	0.0968	0.0050	u	0.100		96.8	70-130			
Trichloroethene (TCE)	0.0975	0.0050	"	0.100		97.5	70-130		•	
Surrogate: Dibromofluoromethane	0.0988		"	0.100		98.8	70-130			
Surrogate: Toluene-d8	0.0980		"	0.100		98.0	70-130			
Surrogate: 4-Bromofluorobenzene	0.0965		"	0.100		96.5	70-130			
LCS Dup (A904043-BSD1)				Prepared	& Analyze	d: 04-Api	:-09			
Benzene	0.102	0.0050	mg/kg	0.100		102	70-130	0.196	20	
Chlorobenzene	0.102	0.0050	H-	0.100		102	70-130	2.29	20	
1,1-Dichloroethene	0.104	0.0050	п	0.100		104	70-130	1.98	20	
Toluene	0.0987	0.0050	II	0.100		98.7	70-130	1.92	20	
Trichloroethene (TCE)	0.0999	0.0050	n	0.100		99.9	70-130	2.39	20	
Surrogate: Dibromofluoromethane	0.0974		· n ·	0.100		97.4	70-130			
Surrogate: Toluene-d8	0.0980		"	0.100		98.0	70-130			
Surrogate: 4-Bromofluorobenzene	0.0958		n	0.100		95.8	70-130 [.]			
Duplicate (A904043-DUP1)	Sou	1rce: 0900880)-03	Prepared & Analyzed: 04-Apr-09						
Benzene	ND	0.0050	mg/kg		ND				20	
Bromobenzene	ND	0.0050	"		ND				20	
Bromochloromethane	ND	0.0050			ND				20	
Bromodichloromethane	ND	0.0050	"		ND				20	
Bromoform	ND	0.0050	11		ND				20	
Bromomethane	ND	0.0050	n		ND				20	
n-Butylbenzene	ND	0.0050	п		ND				20	
sec-Butylbenzene	ND	0.0050			ND				20	
tert-Butylbenzene	ND	0.0050	н		ND				20	
Carbon tetrachloride	ND	0.0050			ND				20	
Chlorobenzene	ND	0.0050			ND				20	
Chloroethane	ND	0.0050			ND				20	
2-Chloroethylvinyl ether	ND	0.0050			ND				20	
	ND	0.0050	"		ND				20	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment-002-08031.20.004	Reported:
Santa Maria CA, 93454	-Project Manager: Aaron Hook	07-Apr-09.13:18

Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	-Reporting -Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch_A904043 - EPA 5030B VC	OCGCMS					_				
-Duplicate (A904043-DUP1)	So	Prepared & Analyzed: 04-Apr-09						•		
Chloromethane	ND	0.0050	mg/kg		ND				20	
2-Chlorotoluene	ND	0.0050	н		ND				20	
4-Chlorotoluene	ND	0.0050	н		ND				20	
1,2-Dibromo-3-chloropropane	ND	0.0050	11-		ND				20	
Dibromochloromethane	ND	0.0050	и		ND				20	
Dibromomethane	ND	0.0050-	n		ND				20	
1,2-Dichlorobenzene	ND	0.0050	17		ND				20	
1,3-Dichlorobenzene	ND	-0.0050	IF.		ND				20	
1.4-Dichlorobenzene	ND	0.0050	4		ND				20	
Dichlorodifluoromethane	ND	0.0050			ND				20	
1.1-Dichloroethane	ND	0.0050			ND				20	
1.2-Dichloroethane	ND	0.0050	11		ND				20	
1.1-Dichloroethene	ND	0.0050	"		ND				20	
cis-1.2-Dichloroethene	ND	0.0050			ND				20	
trans-1.2-Dichloroethene	ND	0.0050	u		ND				20	
1.2-Dichloropropane	ND	-0.0050			ND				20	
1 3-Dichloropropane	ND	0.0050	n		ND				20	
2 2-Dichloropropane	ND	0.0050	n		ND				20	
1 1-Dichloropropene	ND	0.0050	н		ND				20	
cis-1 3-Dichloropropene	ND	0.0050	n		ND				20	
trans-1 3-Dichloropropene	ND	0.0050	н		ND				20	
Ethylbenzene	ND	0.0050	ı		ND				20	
1.2-Dibromoethane (EDB)	ND	0.0050	R		ND				20	
Hexachlorobutadiene	ND	0.0050	11		ND				20	
Isopropylbenzene	ND	0.0050			ND				20	
4-Isopropyl Toluene	ND	0.0050	н		ND				20	
Methylene chloride	0.00296	0.0050	н		0.00300			1.34	20	
Naphthalene	ND	0.0050	n		ND				. 20	
n-Propylbenzene	ND	0.0050	· 11		ND				20	
Styrene	ND	0.0050	н		ND				20	
1 1 1 2-Tetrachloroethane	ND	0.0050	н		ND				20	
1 1 2 2-Tetrachloroethane	ND	0.0050	n		ND				20	
Tetrachloroethene (PCE)	ND	0.0050	н		ND				20	
Toluene	ND	0.0050	n		ND				20	
1.2.3-Trichlorobenzene	ND	0.0050	ч		ND				20	
1 2 4-Trichlorobenzene	ND	0.0050	п		ND				20	
1 1 1-Trichloroethane	ND	0.0050	ч		ND				20	
1 1 2-Trichloroethane		0.0050	п		ND				20	
Trichloroethene (TCE)		0.0050	n		ND				20	
		0.0050	ti -		ND				20	

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project-Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

Volatile Organic Compounds by EPA Method 8260B -- Quality Control

Analyte	Result	Reporting- Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A904043 - EPA 5030B V.O.	CGCMS					_	_			
Duplicate (A904043-DUP1)	Source: 0900880-03			Prepared a	&-Analyze	ed: 04-Ap				
1,2,3-Trichloropropane	ND	0.0050	mg/kg		ND				20	
1,2,4-Trimethylbenzene	ND	0.0050	11		ND				20	
1,3,5-Trimethylbenzene	ND	0.0050	н		ND				20	
Vinyl chloride	ND	0.0050	н		ND				-20	
Xylenes (total)	ND	0.0050	п		ND				20	
Surrogate: Dibromofluoromethane	0.103		"	0.100		103	70-130			_
Surrogate: Toluene-d8	0.0954		n	0.100		95.4	70-130			
Surrogate: 4-Bromofluorobenzene	0.0951		-11	0.100		95.1	70-130			

Batch A904050 - EPA 5030B VOCGCMS

Blank (A904050-BLK2)				Prepared & Analyzed: 06-Apr-09
Benzene	ND	0.0050	mg/kg	
Bromobenzene	ND	0.0050	н	
Bromochloromethane	ND	0.0050	н	
Bromodichloromethane	ND	0.0050	11	
Bromoform	ND	0_0050-	"	
Bromomethane	ND	0.0050	.11-	
n-Butylbenzene	ND	0.0050	11	
sec-Butylbenzene	ND	0.0050	17	
tert-Butylbenzene	ND	0.0050	H-	
Carbon tetrachloride	ND	0.0050	-11-	
Chlorobenzene	ND	0.0050	"	
Chloroethane	ND	0.0050	"	
2-Chloroethylvinyl ether	ND	0.0050	"	
Chloroform	ND	0.0050	"	
Chloromethane	ND	0:0050		,
2-Chlorotoluene	ND	0.0050	"	
4-Chlorotoluene	ND	0.0050	"	
1,2-Dibromo-3-chloropropane	ND	0.0050	"	
Dibromochloromethane	ND	0.0050	"	
Dibromomethane	ND	0.0050	"	
1,2-Dichlorobenzene	ND	0.0050	н	
1,3-Dichlorobenzene	ND	0.0050	"	
1,4-Dichlorobenzene	ND	0.0050	"	
Dichlorodifluoromethane	ND	0.0050	11	•
1,1-Dichloroethane	ND	0.0050	11	
1,2-Dichloroethane	ND	0.0050	11	
1,1-Dichloroethene	ND	0.0050	11	
cis-1,2-Dichloroethene	ND	0.0050	н	
trans-1,2-Dichloroethene	ND	0.0050	11	
Chloroethane 2-Chloroethylvinyl ether Chloroform Chloromethane 2-Chlorotoluene 4-Chlorotoluene 1,2-Dibromo-3-chloropropane Dibromochloromethane 1,2-Dichlorobenzene 1,3-Dichlorobenzene 1,4-Dichlorobenzene Dichlorodifluoromethane 1,2-Dichloroethane 1,2-Dichloroethane 1,2-Dichloroethane 1,2-Dichloroethane 1,2-Dichloroethane 1,2-Dichloroethane 1,2-Dichloroethane 1,2-Dichloroethene cis-1,2-Dichloroethene trans-1,2-Dichloroethene	 N 	0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050 0.0050		

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301_S_Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
-Santa Maria-CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

Volatile_Organic Compounds by EPA Method 8260B - Quality Control

- A nalvte	Result	Reporting Limit	Units	Spike Level	-Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
		2								
Batch_A904050 - EPA 5030B VO	CGCMS						_			
Blank (A904050-BLK2)				Prepared	& Analyze	ed: 06-Ap	r-09			
1,2-Dichloropropane	ND	0.0050	mg/kg							
1,3-Dichloropropane	ND	0.0050	*1							
2,2-Dichloropropane	ND	0.0050	"							
1,1-Dichloropropene	ND	0.0050	n							
cis-1,3-Dichloropropene	ND	-0:0050	п							
trans-1,3-Dichloropropene	ND-	0.0050	n							
Ethylbenzene	ND	0.0050	n							
1,2-Dibromoethane (EDB)	ND	0.0050	n							
Hexachlorobutadiene	ND	0.0050	11							
Isopropylbenzene	ND	0.0050	n							
4-Isopropyl Toluene	ND	0.0050	· #							
Methylene chloride	ND	0.0050	n							
Naphthalene	ND	0.0050	11				•			
n-Propylbenzene	ND	0.0050	II							
Styrene	ND	[·] 0.0050	II.							
1,1,1,2-Tetrachloroethane	ND	0.0050	n							
1,1,2,2-Tetrachloroethane	ND	0.0050	u.							
Tetrachloroethene (PCE)	'ND	0.0050	11							
Toluene	ND	0.0050	*							
1,2,3-Trichlorobenzene	ND	0.0050	н							
1,2,4-Trichlorobenzene	ND	0.0050	n							
1,1,1-Trichloroethane	ND	0.0050	"							
1,1,2-Trichloroethane	ND	0.0050	н							
Trichloroethene (TCE)	ND	0.0050								
Trichlorofluoromethane	ND	0.0050								
1,2,3-Trichloropropane	ND	0.0050	н							
1,2,4-Trimethylbenzene	ND	0.0050	н							
1,3,5-Trimethylbenzene	ND	0.0050								
Vinyl chloride	ND	0.0050								
Xylenes (total)	ND	0.0050	н							
Surrogate: Dibromofluoromethane	0.0996		"	0.100		99.6	70-130			
Surrogate: Toluene-d8	0.0983		11	0.100		98.3	70-130			
Surrogate: 4-Bromofluorobenzene	0.0964		"	0.100		96.4	70-130			

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301-SMiller St., Ste. 210	Project Number: Remedial Assessment 002-08031-20.004	Reported:
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09 13:18-

Volatile Organic Compounds by EPA Method 8260B - Quality Control

Applyte	Result	Reporting	Units	Spike Level	Source Result	%REC	%REC	RPD	RPD Limit	Notes
			01113		ittouit	/01/150		, N D		
Batch A904050 - EPA 5030B VOCGO	CMS							_		
LCS (A904050-BS1)				Prepared	& Analyze	ed: 06-Api	r=09			
Benzene	0.0899	0.0050	mg/kg	0.100		89.9	70-130			
Chlorobenzene	0.0909	0.0050	"	0.100		90.9	70-130			
1,1-Dichloroethene	0.0880	0.0050	"	0.100		88.0	70-130			
Toluene	0.0877	0.0050	"	0.100		87.7	70-130			
Trichloroethene (TCE)	0.0891	0.0050	"	0:100		89.1	70-130			
Surrogate: Dibromofluoromethane	0.0950		л	0.100		95_0	70-130			
Surrogate: Toluene-d8	0.0981		n	0.100		98.1	70-130			
Surrogate: 4-Bromofluorobenzene	0.0958	•	11	0.100		95.8	70-130			
LCS Dup ⁻ (A904050-BSD1)			-	Prepared	& Analyze	ed: 06-Api	-09			
Benzene	0.0935	0.0050	mg/kg	0.100		93.5	70-130	3.93	20	
Chlorobenzene	0.0946	0.0050	IT.	0.100		94.6	70-130	4.05	20	
1,1-Dichloroethene	0.0923	0.0050	19	0.100		92.3	70-130	4.79	20	
Toluene	0.0927	0.0050	11	0.100		927	70-130	5.54	20	
Trichloroethene (TCE)	0.0908	0.0050	н	0.100		90.8	70-130	1.96	20	
Surrogate: Dibromofluoromethane	0.101		"	0.100		101	70-130			
Surrogate: Toluene-d8	0.100		11	0.100		100	70-130			
Surrogate: 4-Bromofluorobenzene	0.0968		n	0.100		96.8	70-130			
Duplicate (A904050-DUP1)	Sou	1rce: 090088	0-01	Prepared a	& Analyze	ed: 06-Apr	~-09 [`]			
Benzene	ND	0.0050	mg/kg		ND				20	
Bromobenzene	ND	0.0050	n		ND				20	
Bromochloromethane	ND	0.0050	n		ND				20	
Bromodichloromethane	ND	0.0050	н .		ND				20	
Bromoform	ND	0.0050	11		ND				20	
Bromomethane	ND	0.0050	n		ND				20	
n-Butylbenzene	ND	0.0050	n		ND				20	
sec-Butylbenzene	ND	0.0050	n		ND				20	
tert-Butylbenzene	ND	0.0050	n		ND				20	
Carbon tetrachloride	ND	0.0050	π		ND				20	
Chlorobenzene	ND	0.0050	n		ND				20	
Chloroethane	ND	0.0050	11		ND				20	
2-Chloroethylvinyl ether	ND	0.0050	u		ND				20	
Chloroform	ND	0.0050	ų		ND				20	
Chloromethane	ND	0.0050	н		ND				20	
2-Chlorotoluene	ND	0.0050	н		ND				20	
4-Chlorotoluene	ND	0.0050	н		' ND				20	
1,2-Dibromo-3-chloropropane	ND	0.0050	"		ND				20	
Dibromochloromethane	ND	0.0050	u		ND				20	
Dibromomethane	ND	0.0050	u		ND				20	
1,2-Dichlorobenzene	ND	0.0050	II		ND				20	

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LFR-Levine Fricke	Project: Renco-Investec Investigation					
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:				
Santa Maria CA, 93454	Project Manager: Aaron Hook	07-Apr-09-13:18				

-Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	_Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A904050 - EPA 5030B VO	CGCMS									
Duplicate (A904050-DUP1)	Se	urce: 090088	0-01	Prepared	& Analyze	d: 06-Ap	r-09			
1,3-Dichlorobenzene	ND	0.0050	mg/kg		ND				20	
1,4-Dichlorobenzene	ND	0.0050	"		ND				20	
Dichlorodifluoromethane	ND	0.0050	11		ND				20	
1,1-Dichloroethane	ND	0.0050	11		ND				20	
L2-Dichloroethane	ND	0.0050			ND				20	
1,1-Dichloroethene	ND	.0.0050	It		ND				20	
cis-1-2-Dichloroethene	0.00344	0.0050	n		0.00656			62.4	20	QR-04
trans-1,2-Dichloroethene	ND	·0.0050	u.		ND				20	
1,2-Dichloropropane	ND	0.0050	n		ND				20	
1.3-Dichloropropane	ND	0.0050			ND				20	
2.2-Dichloropropane	ND	0.0050	н		ND				20	
1.1-Dichloropropene	ND	0.0050	. 11		ND				20	
cis-1.3-Dichloropropene	ND	0.0050	11		ND				20	
trans-1.3-Dichloropropene	ND	0.0050	II		ND				20	
Ethylbenzene	ND	0.0050	н		ND				20	
1.2-Dibromoethane (EDB)	ND	0.0050	n		ND				20	
Hexachlorobutadiene	ND	0.0050	н		ND				20:	
Isopropylbenzene	ND	0.0050	II		ND				20	
4-Isopropyl Toluene	ND	0.0050	п		ND				20	
Methylene chloride	0.00324	0.0050	н		0.00556			52.7	20	QR-0
Naphthalene	ND	0.0050	11		ND				20	
n-Propylbenzene	ND	0.0050	n		ND				20	
Styrene	ND	0.0050	n		ND				20	
1,1,1,2-Tetrachloroethane	. ND	0.0050	н		ND				20	
1,1,2,2-Tetrachloroethane	ND	0.0050	11		ND				20	
Tetrachloroethene (PCE)	ND	0.0050	n		ND				20	
Toluene	ND	0.0050	"		ND				20	
1.2.3-Trichlorobenzene	ND	0.0050	u		ND				20	
1.2.4-Trichlorobenzene	ND	0.0050	n		ND				20	
1.1.1-Trichloroethane	ND	0.0050	n		ND				20	
1.1.2-Trichloroethane	ND	0.0050	II		ND				20	
Trichloroethene (TCE)	0.00412	0.0050	H		0.00728			55.4	20	QR-0
Trichlorofluoromethane	ND	0.0050	"		ND				20	
1.2.3-Trichloropropane	ND	0.0050	н		ND				20	
1.2.4-Trimethylbenzene	ND	0.0050	**		ND				20	
1 3.5-Trimethylbenzene	ND	0.0050	н		ND				20	
Vinvl chloride	ND	0.0050	n		ND				20	
Xylenes (total)	ND	0.0050	71		ND				20	
Surrogate: Dibromofluoromethane	0.104		"	0.100		104	70-130			
Surrogate: Toluene-d8	0.0980			0.100		98.0	-70-130-	-		

Oilfield Environmental and Compliance

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. TEL: (805) 922-4772

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA , 93454	Project Manager: Aaron Hook	07-Apr-09 13:18

Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch A904050 - EPA 5030B-VO	CGCMS-									
Duplicate (A904050-DUP1)	So	urce: 0900880-	01	Prepared	& Analyze	ed: 06-Ap	r-09			
Surrogate: 4-Bromofluorobenzene	0.0926		mg/kg	0.100		92.6	70-130			

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LFR-Levine Fricke	Project: Renco-Investec Investigation	
301 S. Miller St., Ste. 210	Project Number: Remedial Assessment 002-08031.20.004	Reported:
Santa Maria CA, 93454	Project-Manager: Aaron-Hook	07-Apr-09 ^{-13:18}

Notes and Definitions

QR-04	The RPD exceeded the QC control limits.
O-01	This compound is a common laboratory contaminant.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

-RPD Relative Percent Difference

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