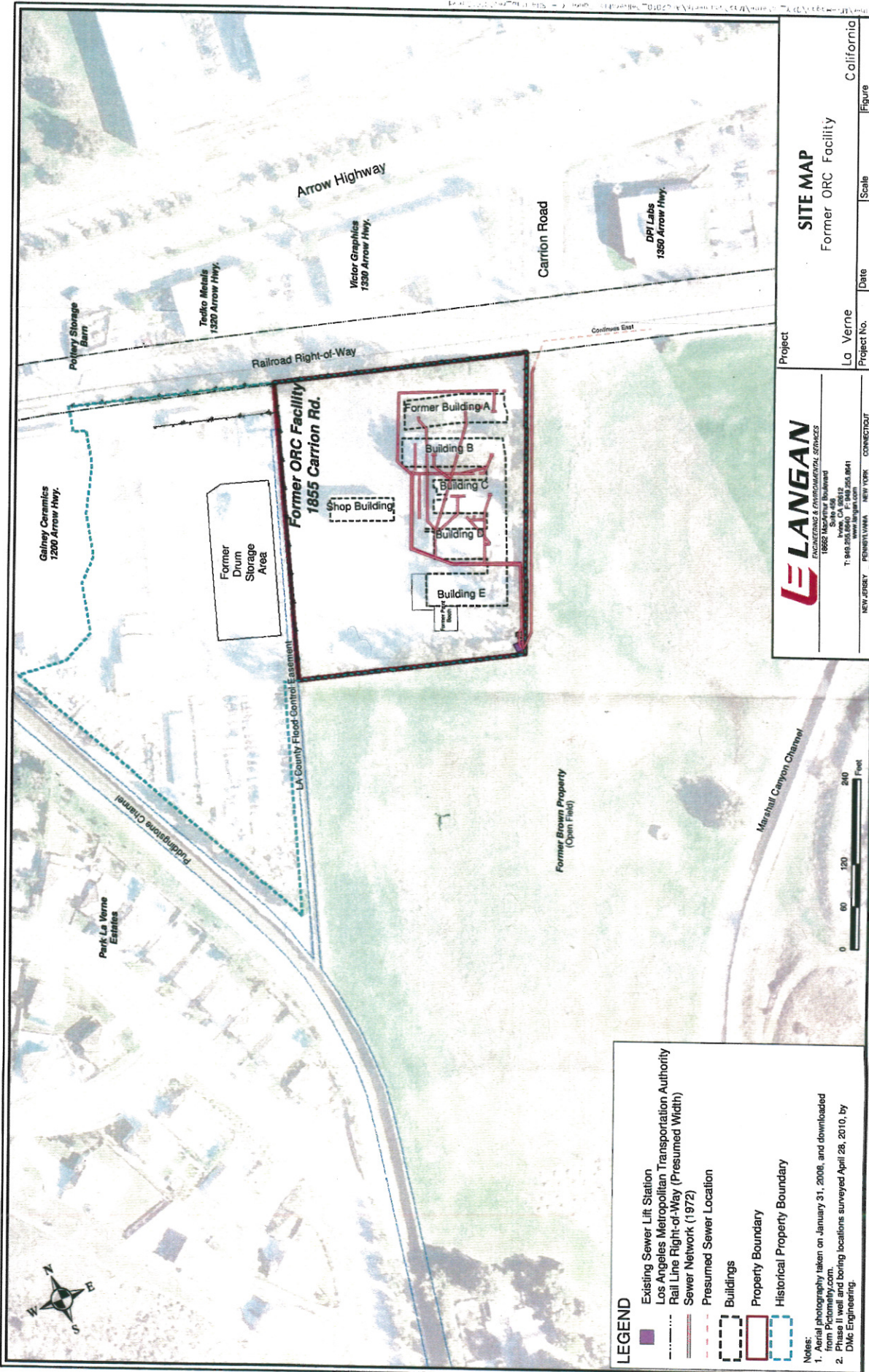


FIGURE 2: SITE MAP



LEGEND

- Existing Sewer Lift Station
- Los Angeles Metropolitan Transportation Authority Rail Line Right-of-Way (Presumed Width)
- Sewer Network (1972)
- Presumed Sewer Location
- Buildings
- Property Boundary
- Historical Property Boundary

Notes:
 1. Aerial photography taken on January 31, 2008, and downloaded from Pictometry.com.
 2. Please II well and boring locations surveyed April 28, 2010, by DMC Engineering.

ELANGAN
 ENVIRONMENTAL & ENGINEERING SERVICES
 1868 MacArthur Boulevard
 Suite 458
 Irvine, CA 92614
 T: 949.255.1100
 www.elangan.com

NEW JERSEY PENNSYLVANIA NEW YORK CONNECTICUT
 OREGON ILLINOIS CALIFORNIA

Project: **Former ORC Facility**

Lo Verne

Date: **9-10-10** Scale: **1" = 120'** Figure: **2**

Project No.: **700010202**

Attachment B: Time Schedule

DIRECTIVE		DUE DATE
1.	Complete Site Assessment and Delineation of Extent of Contamination:	
1a.	Prepare and submit a work plan, including a schedule, for complete assessment and delineation of the extent of all waste constituents in the soil matrix, soil vapor and groundwater beneath the Site.	Within 60 days of receiving directives from Regional Board
1b.	Prepare and submit a site assessment report after the approval of the work plan and its implementation.	According to the schedule approved by the Executive Officer
2.	Update existing Conceptual Site Model (CSM):	
	Update the existing CSM with additional site assessment data after completion of each site assessment phase and evaluate the CSM and identify data gaps for completion of site assessment.	Within 60 days of receiving directives from Regional Board
3.	Conduct Site-Specific Human Health Risk Assessment	
3a.	Prepare and submit a work plan, including a schedule, for conducting a site-wide soil gas survey to update the historical soil gas data and for a conducting a quantitative, site-specific human health risk assessment.	December 31, 2012
3b.	Prepare a quantitative, site-specific human health risk assessment, evaluating existing and future potential risks to human health from all wastes detected in soil matrix, soil vapor and groundwater at the Site through all potential exposure pathways, applying existing regulatory human health screening levels and/or acceptable risk assessment models.	According to the schedule approved by the Executive Officer
4.	Prepare and Implement a Vapor Intrusion Mitigation Plan:	
4a.	If the human health risk assessment indicates a VOCs vapor intrusion threat to the indoor air from the soil gas and if the Regional Board determines a mitigation measure is necessary, a Vapor Intrusion Mitigation Plan shall be prepared together with a schedule within the plan.	Within 60 days of receiving directives from Regional Board
4b.	A Vapor Mitigation Plan implementation report shall be prepared and submitted after the approval and implementation of the plan.	According to the schedule approved by the Executive Officer

DIRECTIVE		DUE DATE
5.	Conduct Remedial Action:	
5a.	Develop and submit a Remedial Action Plan (RAP), including a schedule, for soil matrix, soil vapor and groundwater remediation and abating the effects of the waste released to the environment.	Within 60 days of receiving directives from Regional Board
	Implement the Remedial Action Plan (RAP)	According to the schedule approved by the Executive Officer
	Upon completion of implementation of the Remedial Action Plan (RAP), submit a Remedial Action Completion Report.	According to the schedule approved by the Executive Officer
5b.	Multiple RAPs may be needed if the implemented remedial measure cannot completely achieve site cleanup goals.	Within 60 days of receiving directives from Regional Board

ATTACHMENT C

MONITORING AND REPORTING PROGRAM FOR CLEANUP AND ABATEMENT ORDER NO. R4-2012-0135

This Monitoring and Reporting Program is part of Cleanup and Abatement Order No. R4-2012-0135 (Order). Failure to comply with this program constitutes noncompliance with the Order and California Water Code, which can result in the imposition of civil monetary liability. All sampling and analyses shall be by USEPA approved methods. The test methods chosen for detection of the constituents of concern shall be subject to review and concurrence by the California Regional Water Quality Control Board, Los Angeles Region (Regional Water Board).

Laboratory analytical reports to be included in technical reports shall contain a complete list of chemical constituents which are tested for and reported on by the testing laboratory. In addition, the reports shall include both the method detection limit and the practical quantification limit for the testing methods. All samples shall be analyzed allowable holding time. All quality assurance/quality control (QA/QC) samples must be run on the same dates when samples were actually analyzed. Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report. All analyses must be performed by a California Department of Public Health accredited laboratory.

The Regional Board's *Quality Assurance Project Plan, September 2008*, can be used as a reference and guidance for project activities involving sample collection, handling, analysis and data reporting. The guidance is available on the Regional Board's web site at:

http://www.waterboards.ca.gov/rwqcb4/water_issues/programs/remediation/Board_SGV-SFVCleanupProgram_Sept2008_QAPP.pdf

GROUNDWATER MONITORING

The Discharger shall collect groundwater samples from groundwater monitoring wells installed for the purpose of site investigation and monitoring. Any monitoring well installed in the future shall be added to the groundwater monitoring program and sampled quarterly. The groundwater surface elevation (in feet above mean sea level [MSL]) in all monitoring wells shall be measured and used to determine the gradient and direction of groundwater flow. The following shall constitute the monitoring program for groundwater.

Constituent	EPA Method
Volatile Organic Compounds (full scan)	EPA 8260B
Temperature	Field*
pH	Field*
Electrical Conductivity	Field*
Dissolved oxygen	Field*
Oxidation-Reduction Potential (ORP)	Field*
Turbidity	Field*

*Field - To be measured in the field.

REMEDATION SYSTEMS

Reports on remediation systems shall contain the following information regarding the site remediation systems:

1. Maps showing location of all remediation wells and groundwater monitoring wells, if applicable;
2. Status of each remediation system including amount of time operating and down time for maintenance and/or repair;
3. Air sparge well operating records including status of each well and volume and pressure of air being injected;
4. Soil vapor extraction well records including status of each well and PID readings or other acceptable methods of determining relative volatile concentrations taken at a minimum quarterly. Readings of volatile concentrations drawn from SVE wells need to be taken at a frequency that allows the efficient operation and evaluation of the SVE system;
5. The report shall include tables summarizing the operating and performance parameters for the remediation systems; and
6. System inspection sheets shall document field activities conducted during each Site visit and shall be included in the quarterly reports.

MONITORING REQUIREMENTS AND FREQUENCIES

Specifications in this monitoring program are subject to periodic revisions. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this Order. Monitoring frequencies may be adjusted or parameters and locations removed or added by the Executive Officer if Site conditions indicate that the changes are necessary.

REPORTING REQUIREMENTS

1. The Discharger shall report all monitoring data and information as specified herein. Reports that do not comply with the required format will be REJECTED and the Discharger shall be deemed to be in noncompliance with the Monitoring and Reporting Program.
2. Quarterly groundwater monitoring reports shall be submitted to the Regional Water Board according to the schedule below.

<u>Monitoring Period</u>	<u>Report Due</u>
January - March	April 15
April - June	July 15
July - September	October 15
October - December	January 15

Groundwater monitoring reports shall include a contour map showing groundwater elevations at the Site and the groundwater flow direction. The quarterly groundwater monitoring reports shall include tables summarizing the historical depth-to-water, groundwater elevations and historical analytical results for each monitoring well. The results of any monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall be reported to the Regional Water Board.

Field monitoring well sampling sheets shall be completed for each monitoring well sampled and included in the report.

Quarterly remediation progress reports shall be submitted to the Regional Water Board according to the schedule below.

<u>Monitoring Period</u>	<u>Report Due</u>
January - March	April 30
April - June	July 31
July - September	October 31
October - December	January 31

3. Remediation progress reports shall include an estimate of the cumulative mass of contaminant removed from the subsurface, system operating time, the effectiveness of the remediation system, any field notes pertaining to the operation and maintenance of the system and, if applicable, the reasons for and duration of all interruptions in the operation of any remediation system and actions planned or taken to correct and prevent interruptions.
4. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements. All data shall be submitted in electronic form in a form acceptable to the Regional Water Board.

Responsiveness Summary - Draft Cleanup and Abatement Order R4-2012-XXXX
Comment Due Date: March 29, 2012
Former United Production Services, Inc. (Former Occidental Research Corporation)
1855 Carrion Road, La Verne, California
(WIP File No. 101.0077 and Site ID No. 2040030)

1-1 Glenn Springs Holdings, Inc.
2-1 University of La Verne

No.	Author	Date	Comment	Regional Board's Response
1-1.1	Glenn Springs Holdings, Inc.	03/29/2012	[Glenn Spring Holdings Inc.'s (GSHI's)] role in this matter is limited to managing ongoing environmental concerns at the former [Occidental Research Corporation (ORC)] facility Site. Occidental Petroleum Corporation (OPC) is also referenced in the Draft [Cleanup and Abatement Order (CAO)] as the parent company of ORC and GSHI. Neither OPC nor GSHI can be designated as a "Discharger" or "Responsible Party" (RP) with respect to ORC's alleged obligations at the Site under Water Code sections 13267 or 13304, since neither entity ever owned or operated at the Site. Accordingly, we request the Draft CAO be modified to delete reference to GSHI as a Discharger and RP [sic].	The CAO has been revised in response to your comment.
1-1.2	Glenn Springs Holdings, Inc.	03/29/2012	We request that the Regional Board acknowledge that the facility was connected to the sanitary sewer in 1971 (see [Revised Site Assessment Report (RSAR)] Section 1.1 page 3). Connecting sanitary wastes to the sewer system would have precluded any discharges to the ground. We also request that the Regional Board indicate that ORC's operations at the Site ceased in 1978 (see RSAR Table 1 and Section 1.2 page 3).	The CAO has been revised in response to your comment.
1-1.3	Glenn Springs Holdings, Inc.	03/29/2012	With respect to the septic tank / seepage pit areas noted by the Regional Board, we request that the following information be included in the final CAO. The Draft CAO	The only evidence the Regional Board obtained regarding the depths of the seepage pits is copies of permits granted to ORC. As-built drawings are not

Responsiveness Summary - Draft Cleanup and Abatement Order R4-2012-XXXX
Comment Due Date: March 29, 2012

Former United Production Services, Inc. (Former Occidental Research Corporation)
 1855 Carrion Road, La Verne, California
 (WIP File No. 101.0077 and Site ID No. 2040030)

No.	Author	Date	Comment	Regional Board's Response
	Inc.		<p>indicates that the depths of the seepage pits ranged from 30 ft to 50 ft deep as indicated by the permits on record. However, there are no as-built drawings indicating that these seepage pits were constructed to these depths. Indeed, the practice at the time was to not install seepage pits below the water table. Therefore, during construction of the pits, it is more likely that the pits would not have been installed to their permitted depth, but would have been terminated at least 2-feet above the groundwater table. We request that the Regional Board acknowledge that the depth of construction of the seepage pits is unknown and that the pits may have been constructed to depths above the groundwater table.</p>	<p>available in the case file. There is no evidence in our case file that the pits may have been constructed to depths above the groundwater table. Your comment will be included in the record for this matter.</p>
1-1.4	Glenn Springs Holdings, Inc.	03/29/2012	<p>This section also states that "Mr. Mike Brown and Mrs. Nancy Brown purchased the property to use it for grandstand storage." There is documentation that they also constructed grandstands at this location.</p>	<p>The CAO has been revised in response to this comment.</p>
1-1.5	Glenn Springs Holdings, Inc.	03/29/2012	<p>There are similarly no remediation records from Five Star La Verne Development, the Browns or [United Production Services (UPS)].</p>	<p>The Regional Board does not have any record on remediation activities by Five Star La Verne Development, the Browns or UPS. As new information becomes available in the Regional Board's record, the Regional Board will revise the CAO, if appropriate, based on the new information.</p>

page 26). We request that these issues be addressed in the Draft CAO.

XXX
on)

1-1.7	Glenn Springs Holdings, Inc.	03/29/2012	Clarification is needed on what operations conducted at the Site during Mr. Lem's three ownership and during Five Star La Verne Development Group's approximate three ownership, including operations by the unaffiliated tenants. As noted in CET's 1995 report, Five Star Verne Development Group conducted storage and cleaning of recreational vehicles and leased space at the Site to Orbit Moving Systems and Hydrocarbons Inc.
1-1.8	Glenn Springs Holdings, Inc.	03/29/2012	The presence of the Brown's paint storage tank MW-103 should also be noted.

Responsiveness Summary - Draft Cleanup and Remediation Comment Due Date: February 1, 2013
Former United Production Services, Inc. (Formerly La Verne Development Group)
1855 Carrion Road, La Verne, CA 91705
(WIP File No. 101.0077 and Site No. 101.0077)

No.	Author	Date	Comment
1-1.6	Glenn Springs Holdings, Inc.	03/29/2012	Item 8 indicates that Robert Lem only operated the Site for a three month period until 1986. Five Star La Verne Development Group owns the Site for approximately three years during which the City of La Verne issued a notice of violation to Robert Lem in 1987 because of unauthorized storage of materials in buildings (see RSAR Section 3.1.4). In addition, Mr. Brown indicated that Five Star Development Group "had allowed someone to dump paint on trucks with solvent" and that "the limited amount of paint shows signs of contamination", and Mr. Brown further admitted he could "dig up this soil and mix it with blacktop" (see RSAR Section 3.1.4).

O, the Regional Board will review the historical activities of Five Star Development Group. At this point, the documentation regarding the ownership of the property during the ownership of Five Star Development Group. If new information becomes available in the future, it will be included in the record and the Regional Board will review it, if appropriate, based on the information provided.

does not have adequate documentation of the activities conducted by Mr. Lem. Five Star Development Group. If new information becomes available in the future, it will be included in the record and the Regional Board will review it, if appropriate, based on the information provided.

to address your comment.

ery - Draft Cleanup and Abatement Order R4-2012-XXXX
Comment Due Date: March 29, 2012
uction Services, Inc. (Former Occidental Research Corporation)
855 Carrion Road, La Verne, California
File No. 101.0077 and Site ID No. 2040030)

No.	Author	Date
1-1.9	Glenn Springs Holdings, Inc.	03/29/2012
1-1.10	Glenn Springs Holdings, Inc.	03/29/2012
2-1.1	University of La Verne	04/02/2012
2-1.2	University of La Verne	04/02/2012

Regional Board's Response
<p>Evidence from the construction of waste disposal systems, such as seepage pits, and groundwater data suggest that there was a discharge(s) of PCE. The configuration of the groundwater monitoring well network during the initial phase of site investigations and the slow travel time of waste constituents to reach groundwater monitoring wells could be the reasons for the late discovery of a PCE plume in the groundwater beneath the Site.</p>
<p>The last full-round quarterly groundwater monitoring was conducted in 2002. At least a year-long quarterly groundwater monitoring is necessary to establish a baseline and monitor contaminant concentration trends in different seasons. The Regional Board will consider a request for change in frequency of groundwater monitoring events after a year of quarterly monitoring.</p>
<p>The CAO has been revised in response to the comment.</p>
<p>With the inclusion of the "particularly in the scope of this section. Evidence in from 1990, more than 10 years after of ORC operations at the Site, sale of and several successive property owners, years of Site-wide groundwater indicate that PCE had not been detected ry levels. While other VOCs may have , we believe it is inappropriate to rticularly PCE" phrasing.</p>
<p>believe that quarterly groundwater ed to provide the data required to -RA or for development of a remedial /e consider annual sampling to be e purposes of this project.</p>
<p>Occidental Order states-"In December 2000, a property from the Brown Family Trust. develop the Site into an athletic complex ildings for its, Graduate School Program." use has been discussed as a possibility, as never "planned" for that usage. e finalize the orders to replace the l statement quoted above with ... more nt.</p>
<p>The statement describes the Regional Board's approach to identify potentially responsible parties for the site. At this point, the Regional Board has not named the University of La Verne as one of the responsible parties for the site, but may consider doing</p>

Responsiveness Summary - Draft Cleanup and Abatement Order R4-2012-XXXX

Comment Due Date: March 29, 2012

Former United Production Services, Inc. (Former Occidental Research Corporation)

1855 Carrion Road, La Verne, California

(WIP File No. 101.0077 and Site ID No. 2040030)

No.	Author	Date	Comment	Regional Board's Response
			other persons should be named as additional responsible parties to this Order. We are puzzled as to the mention of the University in that regard. The studies indicate that the contamination predated our acquisition of the property, so that should be a moot point.	so in the future due to the University's ownership of the property.