ROGERS JOSEPH O'DONNELL, PC
ROBERT C. GOODMAN (State Bar No. 111554)
ANN M. BLESSING (State Bar No. 172573)
D. KEVIN SHIPP (State Bar No. 245947)
311 California Street
San Francisco, California 94104
Telephone: 415.956.2828
Facsimile: 415.956.6457

Attorneys for Petitioner
Senior Aerospace SSP

Received
NOV 2014
Office of the
Chief Counsel

STATE WATER RESOURCES CONTROL BOARD

STATE OF CALIFORNIA

In the Matter of SENIOR AEROSPACE SSP, Petitioner Requirement for Technical Report Pursuant to California Water Code Section 13267 Order No. R4-2014-0176 of the Regional Water Quality Control Board, Los Angeles Region	PETITION NO. **PETITION FOR REVIEW**

Pursuant to California Water Code section 13320 and Title 23 of the California Code Regulations §§ 2050 *et seq.*, Petitioner Senior Aerospace SSP ("Petitioner") hereby petitions the State Water Resources Control Board ("State Board") for review of the *Requirement for Technical Report Pursuant to California Water Code Section 13267 Order No. R4-2014-0176* ("2014 Order") adopted by the California Regional Water Quality Control Board, Los Angeles Region ("Regional Board") on October 6, 2014. The 2014 Order purports to require Breeze-Eastern Corporation and Petitioner to prepare and submit a Technical Report for Groundwater Monitoring ("Monitoring Report") to evaluate the conditions at the property located at 2980 North San Fernando Boulevard, Burbank, California ("the Site"). Among other things, the 2014 Order contains serious factual errors that render it legally defective, including but not limited to improperly naming Petitioner as

monitoring wells at the Site, W-1 to W-3, which were last sampled in 2006. The Source Group, Inc. prepared a Fourth Quarter 2006 Groundwater Monitoring and Sampling Report, dated November 29, 2006, with the results of this sampling. That report is attached as Exhibit B. The 2014 Order requires Breeze-Eastern Corporation and Petitioner to submit a semiannual groundwater sampling and monitoring report for wells W-1 through W-3 by January 15, 2015, and subsequent reports by July 2015 and January 2016.

The Regional Board previously issued an order relating to the Site, requiring Breeze-Eastern Corporation, Mr. William Zimmerman, Mr. James Galbraith, and Petitioner to submit a Subsurface Soil Investigation Workplan to the Regional Board by August 2, 2013. (*Revised Order to Provide a Technical Report for Subsurface Soil Investigation California Water Code Section 13267 Order No. R4-2012-0069-A01*, dated June 20, 2013 ("2013 Revised Order").) A copy of the 2013 Revised Order is attached as Exhibit C. A Workplan dated October 4, 2013, was prepared and submitted by Kennedy/Jenks Consultants on behalf of SSP Industries, "a wholly-owned subsidiary of Breeze-Eastern Corporation." The Regional Board conditionally approved that Workplan on March 14, 2014. Breeze-Eastern is now in the process of preparing a Subsurface Soil Investigation Report and Chemical Storage and Use Questionnaire as required by the Regional Board's conditional approval.

The 2013 Revised Order identifies Breeze-Eastern Corporation, Mr. William Zimmerman, Mr. James Galbraith and Petitioner as "the entities responsible for the suspected discharges of waste identified in paragraph (2) and (4) because Mr. William Zimmerman and Mr. James Galbraith were the owners/operators of the facility [Stainless Steel Products/Industries] where the activities occurred that resulted in the suspected discharges of waste were performed and [Petitioner] is a subsidiary of Breeze-Eastern Corporation and successor to Stainless Steel Products/Industries." (2013 Revised Order, Paragraph 5.)

On July 15, 2013, counsel for Petitioner sent a letter to the Regional Board alerting it that the 2013 Revised Order contained serious factual errors – that Petitioner is the successor to Stainless Steel Products/Industries and/or a subsidiary of Breeze-Eastern Corporation. The Regional Board failed to respond. On July 23, 2013, Petitioner filed a

petition with the State Board, notifying it and the Regional Board that the issuance of the 2013 Revised Order to Petitioner was inappropriate and improper because it was based on the erroneous allegations. Petitioner asked that the Petition be held in abeyance.

The 2014 Order contains similar factual errors regarding an alleged affiliation between Petitioner and Stainless Steel Products/Industries as those contained in the 2013 Revised Order. The 2014 Order addresses the former operations of "Stainless Steel Products/Industries." (2014 Order, Paragraph 2.) The 2014 Order states that "Stainless Steel Products/Industries operations at the Site included the use of caustics, petroleum products, chlorinated solvents, hexavalent chromium, sodium dichromate, and chromic acid" and "[m]etal coating and metal finishing." (2014 Order, Paragraph 2.) The 2014 Order states that in the fourth quarter of 2006, PCE, TCE, and hexavalent chromium concentrations in groundwater at the Site exceeded maximum contaminant levels. (2014 Order, Paragraph 4.) The 2014 Order then identifies Breeze-Eastern Corporation and Petitioner as "the entities responsible for the discharges of wastes identified in paragraphs two (2) and four (4) because SSP Industries, a wholly-owned subsidiary of Breeze-Eastern Corporation was the former entity who operated and Senior Aerospace SSP, a successor to Stainless Steel Products is the current entity who operated the activity that resulted in the potential discharge of waste to the subsurface." (2014 Order, Paragraph 5.)

Like the 2013 Revised Order's allegations, the 2014 Order's allegations concerning Petitioner's alleged affiliation with Stainless Steel Products, Stainless Steel Industries, and Breeze-Eastern Corporation are incorrect. Petitioner has no corporate relationship whatsoever to Breeze-Eastern Corporation. (*See Declaration of Steven Loye in Support of Petition for Review* ("Loye Decl."), Paragraph 3.)[1] Petitioner is also not a "successor to Stainless Steel Products/Industries." Rather, in 1995, Senior Flexonics, Inc. purchased the assets of Stainless Steel Products, Inc., and Petitioner subsequently operated those assets. (Loye Decl., Paragraph 4.)

[1] The Loye Declaration is being submitted concurrently with the Petition for Review. *See also* Section X, below.

B. The Regional Board's Action Was Inappropriate and Improper

The factual basis for naming Petitioner in the 2014 Order is defective because Petitioner is not a subsidiary of Breeze-Eastern Corporation nor is it a successor to the liabilities of Stainless Steel Products/Industries. The 2014 Order finds that Petitioner is an entity "responsible for the discharges of wastes identified in paragraphs two (2) and four (4) because SSP Industries, a wholly-owned subsidiary of Breeze-Eastern Corporation was the former entity who operated and Senior Aerospace SSP, a successor to Stainless Steel Products is the current entity who operated the activity that resulted in the potential discharge of waste to the subsurface." (2014 Order, Paragraph 5.) As discussed above, both of these justifications for naming Petitioner on the 2014 Order are factually incorrect.

Petitioner is not a subsidiary of Breeze-Eastern Corporation, and has no legal relationship to that entity. (Loye Decl., Paragraph 3.) Additionally, Petitioner is not a "successor" to "Stainless Steel Products/Industries." Petitioner was formed following purchase of the assets of Stainless Steel Products, Inc. in 1995, not Stainless Steel Products/Industries. (*Id.*, Paragraph 4.) And because the transaction was an asset purchase, Petitioner has no liability, as successor, for any of the actions of Stainless Steel Products, Inc. (*See Franklin v. USX Corporation*, 87 Cal. App. 4th 615, 621-622 (2001).) These factual errors in the 2014 Order undermine the conclusion set forth in Paragraph 5 of the 2014 Order that Petitioner is "responsible" for "discharges of waste" at the Site.

The 2014 Order's findings implicate Stainless Steel Products/Industries as a waste discharger at the Site. The 2014 Order links Petitioner to the Site only by way of the erroneous factual statement that Petitioner is a subsidiary of Breeze-Eastern Corporation and a "successor" to Stainless Steel Products/Industries. As these assertions are factually incorrect, the 2014 Order should be rescinded as it applies to Petitioner, and Petitioner should not be named as an entity responsible for the discharges of waste at the Site.

To the extent that the 2014 Order is based on the assumption that Senior SSP itself discharged waste at the Site, it identifies no evidence to support that assertion. A Regional Board's authority to name responsible parties is not limitless. The Regional Board

must have "a reasonable basis on which to name each responsible party. There must be substantial evidence to support a finding of responsibility for each named party." (*In the Matter of the Petition of Exxon Company, U.S.A.*, Order No. 85-066, 1985 WL 20026 (Cal.St.Wat.Res.Bd.) *6 (1985) ("*Exxon*").) This requires "credible and reasonable evidence which indicates the named party has responsibility." (*Id.*) In *Exxon*, the State Board found it inappropriate to name Exxon as a responsible party because there was simply no evidence to tie Exxon to the alleged pollution. (*Id.* at * 7.) Similarly, *In the Matter of Petition of Chevron Products Company*, Order WQO 2004-0005, 2004 WL 1378359 (Cal.St.Wat.Res.Bd.) *3 (2004), the State Board held that a Regional Board "must identify the evidence that supports requiring [a] person to provide [a] report[]." Because substantial evidence showed that another party was responsible for the discharges affecting groundwater, the State Board found that Chevron was not properly named in the Regional Board's order. (*Id.* at * 5.) These decisions are consistent with the language of Water Code Section 13304(a), which requires "active, affirmative or knowing conduct" with regard to the contamination. (*Redevelopment Agency v. BNSF Ry.*, 643 F.3d 668, (9th Cir. 2013); *See also City of Modesto Redevelopment Agency v. Superior Court*, 119 Cal. App. 4th 28, 44 (2004) (Section 13304's "causes and permits" language was not intended "to encompass those whose involvement with a spill was remote or passive.")

Here the chemicals of concern identified in the 2014 Order are PCE, TCE, and hexavalent chromium. (2014 Order, Paragraphs 1, 4.) The Regional Board has not identified any evidence that Petitioner discharged any of these chemicals. Further, the Fourth Quarter 2006 Groundwater Monitoring and Sampling Report, dated November 27, 2006, submitted by the Source Group, Inc. states on page 9 that: 1) "[h]istoric site investigation results indicate that the VOCs present in the groundwater beneath the Site originated from off-site sources; and 2) "soils at the Site are not a potential source of chromium to groundwater."

V. THE MANNER IN WHICH PETITIONER HAS BEEN AGGRIEVED

The Petitioner has been aggrieved by the Regional Board's actions because it will be subjected to provisions of an arbitrary and capricious order unsupported by substantial

evidence in the record. As a result of being named as an entity "responsible for the discharges of waste" at the Site, the Petitioner will be forced to shoulder significantly increased costs of compliance, to bear a heavier burden of regulatory oversight and to suffer other serious economic consequences to its business operations.

VI. STATE BOARD ACTION REQUESTED BY PETITIONER

Petitioner requests that the State Board determine that the Regional Board's adoption of the 2014 Order was arbitrary and capricious or otherwise inappropriate and improper, and requests that the State Board amend the 2014 Order to delete Petitioner as an entity "responsible for the discharges of waste."

VII. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL ISSUES RAISED IN THE PETITION

For purposes of this filing, the Statement of Points and Authorities is subsumed in section IV of the Petition. Petitioner reserves the right to file a Supplemental Statement of Points and Authorities, including references to the complete administrative record, which is not yet available. Petitioner also reserves its right to supplement its request for a hearing to consider testimony, other evidence and argument.

VIII. STATEMENT REGARDING SERVICE OF THE PETITION ON THE REGIONAL BOARD

A copy of this Petition is being sent to the Regional Board, to the attention of Samuel Unger, P.E., Executive Officer and Jillian Ly, Water Resources Control Engineer. Copies of this Petition are also being sent to the entities/individuals as indicated in the 2014 Order.

IX. STATEMENT REGARDING ISSUES PRESENTED TO THE REGIONAL BOARD

Petitioner was not presented an opportunity to comment on or object to the 2014 Order prior to its issuance by the Regional Board. However, as discussed in Section IV.A. above, Petitioner previously raised the issue of similar factual errors included in the 2013 Revised Order with the Regional Board. In addition, Petitioner wrote to the Regional Board on October 24, 2014 (see Exhibit D attached hereto), to point out the factual inaccuracies in the 2014 Order and to request that the order be rescinded as to Petitioner.

The Regional Board never responded to the letter.

X. REQUEST THAT SUPPLEMENTAL EVIDENCE BE CONSIDERED

Pursuant to 23 Cal. Code of Regs. § 2050.6, Petitioner requests that the information contained in the Declaration of Steven Loye, submitted concurrently with this Petition, be considered by the State Board. As discussed above, Petitioner was not afforded an opportunity to comment on or object to the 2014 Order and therefore was unable to discuss this evidence to the Regional Board. However, the information was provided to the Regional Board following its issuance of the 2013 Revised Order and thus should already be contained in the record. The evidence set out in the Loye Declaration addresses and directly contradicts the erroneous factual statements in the 2014 Order, specifically that Petitioner is a subsidiary of Breeze-Eastern Corporation and a "successor" to Stainless Steel Products/Industries. Accordingly, the evidence in the Loye Declaration is highly relevant and should be considered by the State Board.

For all of the foregoing reasons, if the Petitioner pursues its appeal, it respectfully requests that the State Board review the 2014 Order and grant the relief as set forth above.

Dated: November 4, 2014

ROGERS JOSEPH O'DONNELL, PC

By: _____
ROBERT C. GOODMAN

Attorneys for Petitioner
Senior Aerospace SSP

EXHIBIT A

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

October 6, 2014

Mr. James D. Cashel
General Counsel
Breeze-Eastern Corporation
35 Melanie Lane
Whippany, New Jersey 07981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7099 3220 0000 1743 7499

Mr. Steven Loye
Chief Executive Officer
Senior Aerospace SSP
2980 North San Fernando Boulevard
Burbank, California 91504

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7013 1090 0000 7172 5539

SUBJECT: **REQUIREMENT FOR TECHNICAL REPORT PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2014-0176**

SITE: **STAINLESS STEEL PRODUCTS/INDUSTRIES, 2980 SAN FERNANDO BOULEVARD, BURBANK, CALIFORNIA (FILE NO. 104.1005)**

Dear Messrs. Cashel and Loye:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of the Los Angeles and Ventura counties, including the above-referenced site (Site).

The Regional Board is investigating potential sources for groundwater contamination within the United States Environmental Protection Agency (USEPA) San Fernando Valley Superfund Site (Superfund Site). It is known that groundwater within the Superfund Site, including the vicinity of the Stainless Steel Products/Industries facility, is contaminated with volatile organic compounds (VOCs) and heavy metals, particularly chromium.

The Regional Board has reviewed the most recent available groundwater monitoring report, dated November 29, 2006 submitted by The Source Group, Inc. on behalf of the Site. This report shows that tetrachloroethylene and trichloroethylene concentrations in all three onsite groundwater monitoring wells exceed the maximum contaminant levels established by the State Water Resource Control Board Division of Drinking Water (DDW). In addition, hexavalent chromium concentration in well W-3 also exceeds the maximum contaminant level established by the DDW.

Enclosed is a Regional Board order for technical report requirements pursuant to California Water Code section 13267 Order No. R4-2014-0176 (Order). This Order has been issued for implementation of a semiannual groundwater monitoring program to assess current Site groundwater conditions.

Should you have any questions related to this matter, please contact Ms. Jillian Ly at (213) 576-6731 or jillian.ly@waterboards.ca.gov.

Sincerely,

for Paula Rasmussen

Samuel Unger, P.E.
Executive Officer

Enclosure: California Water Code Section 13267 Order No. R4-2014-0176

cc: Mr. Leo Chan, City of Glendale
Ms. Lisa Hanusiak, USEPA Region IX
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Albert Gastelum, Los Angeles Department of Water & Power
Mr. Jonathan Leung, Los Angeles Department of Water & Power
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster
Mr. John A. Simon, Gnarus Advisors LLC
Mr. Robert C. Goodman, Rogers Joseph O'Donnell

ORDER TO PROVIDE A TECHNICAL REPORT FOR GROUNDWATER MONITORING CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2014-0176

DIRECTED TO BREEZE-EASTERN CORPORATION AND SENIOR AEROSPACE SSP

STAINLESS STEEL PRODUCTS/INDUSTRIES 2980 NORTH SAN FERNANDO BOULEVARD, BURBANK, CALIFORINA (FILE NO. 104.1005)

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267, which authorizes the Regional Board to require the submittal of technical and monitoring reports.

1. The groundwater within the San Fernando Valley Groundwater Basin (Basin) has been impacted by discharges of volatile organic compounds (VOCs), specifically tetrachloroethylene (PCE) and trichloroethylene (TCE) and heavy metals, specifically chromium. The San Fernando Valley Superfund Site (Superfund Site) lies within the Basin. The United States Environmental Protection Agency (USEPA) and the Regional Board are investigating the potential sources of the discharges to the Basin. The agencies are currently focused on identifying individuals and companies responsible for the discharges of VOCs and chromium in the Basin and holding them responsible for the investigation and remediation of the source sites. The property located at 2980 North San Fernando Boulevard, in the City of Burbank, California (Site) is impacted with PCE, TCE and chromium.

2. The Site was developed and occupied by Stainless Steel Products/Industries since approximately 1952. The Site is currently owned by Rexford Industrial of Los Angeles, California and occupied by Senior Aerospace SSP, a successor to Stainless Steel Products. Stainless Steel Products (SSP) Industries is a wholly-owned subsidiary of Breeze-Eastern Corporation. Stainless Steel Products/Industries operations at the Site included the use of caustics, petroleum products, chlorinated solvents, hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and metal finishing processes were part of the on-site operations conducted by Stainless Steel Products/Industries. Previous subsurface investigations documented that releases of PCE and TCE had occurred to the soil depths of 90 feet below ground surface (bgs). Site investigation activities have included soil gas surveys, soil boring and sampling, geoprobe installation, groundwater monitoring well installation, groundwater sampling and other site assessment activities. A soil vapor extraction system operated at the Site from 1998 through 2002. The Regional Board issued a No Further Requirement letter for the unsaturated zone for the VOC investigation in April 2005. Groundwater sampling was last conducted at the Site in 2006.

In September 2012, the Site was issued a CWC section 13267 Order by the Regional Board for the investigation of heavy metals based on the previous use of chemicals of concern. The heavy metals investigation is underway. While Stainless Steel Products/Industries and Breeze-Eastern Corporation are participating in site investigation activities under the oversight of the Regional Board, groundwater data from the three onsite monitoring wells (W-1 through W-3) has not been collected in recent years to assess the current groundwater conditions.

3. CWC section 13267(b)(1) states:

> "In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

4. The Regional Board staff has reviewed the most recent available groundwater monitoring report, *Fourth Quarter 2006 Groundwater Monitoring and Sampling Report*, dated November 29, 2006, submitted by the Source Group, Inc. on behalf of the Site. Review of the report indicates that:

   a. PCE and TCE concentrations in onsite groundwater monitoring wells W-1 through W-3 exceeds the maximum contaminant levels established by the State Water Resource Control Board Division of Drinking Water (DDW). Hexavalent chromium concentrations in onsite groundwater monitoring well W-3 also exceeds the maximum contaminant level established by the DDW.

   b. The maximum concentration of PCE, TCE, and hexavalent chromium was detected in well W-3 at concentrations of 785 micrograms per liter (µg/L), 2,990 µg/L, and 31.1 µg/L, respectively.

5. This Order identifies Breeze-Eastern Corporation and Senior Aerospace SSP as the entities responsible for the discharges of waste identified in paragraphs two (2) and four (4) because SSP Industries, a wholly-owned subsidiary of Breeze-Eastern Corporation was the former entity who operated and Senior Aerospace SSP, a successor to Stainless Steel Products is the current entity who operated the activity that resulted in the potential discharge of waste to the subsurface.

6. This Order requires the persons/entities named herein to prepare and submit groundwater monitoring and analyses reports in order to evaluate the conditions at the Site. You are expected to submit a complete report, as required by this Order, to the Regional Board. The

Regional Board may reject the report if it is deemed incomplete and/or require revisions to the groundwater monitoring fieldwork performance under this Order.

7. The Regional Board needs this information in order to:

   a. Evaluate the status of groundwater conditions at the Stainless Steel Products/Industries facility.

   b. Determine whether the Site is a chronic source of constituents of concern to the groundwater resources beneath the Site and whether the conditions presently are threatening the waters of the State within the Basin.

8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to identify sources of discharges of waste to the Basin and to assure adequate cleanup of the facility, which as described above potentially poses significant threats to public health and the environment.

9. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plan are not yet known. It is unlikely that implementation of the work associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.

10. Any person aggrieved by this action of the Regional Board may petition the State Water Resources Control Board (State Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at the following link:

    http://www.waterboards.ca.gov/public_notices/petitions/water_quality

    or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Breeze-Eastern Corporation, and Senior Aerospace SSP pursuant to section 13267(b) of the CWC, are required to submit the following:

1. **By January 15, 2015,** submit a semiannual groundwater sampling and monitoring report for wells W-1 through W-3 which includes at least the following information:

a. Groundwater monitoring reports shall include a contour map showing groundwater elevations at the Site and the groundwater flow direction. The semiannual 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 this Order 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.

b. 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 Regional Board.

c. 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 within the 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 CDPH accredited laboratory.

d. 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

e. The following shall constitute the monitoring program for groundwater:

Constituent	EPA Method
Volatile Organic Compounds (full scan)	EPA 8260B
Metals	EPA 6010B
Hexavalent Chromium	EPA 7199
Perchlorate	EPA 314.0
1,4-dioxane	EPA 8270C
N-Nitrosodimethylamine (NDMA)	EPA 1625C
Temperature	Field*
pH	Field*
Electrical Conductivity	Field*
Dissolved oxygen	Field*
Oxidation-Reduction Potential (ORP)	Field*
Turbidity	Field*

*Field - To be measured in the field.

2. Subsequent semiannual groundwater monitoring shall be conducted in accordance with the following schedule:

Reporting Period	Report Due Date
January – June	July 15
July – December	January 15

The above item shall be submitted to:

Ms. Jillian Ly, P.E.
Water Resources Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013
Phone: (213) 576-6731
Email: jillian.ly@waterboards.ca.gov

Pursuant to 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars ($1,000) per day for each day the report is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The Regional Board, under the authority given by the CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized Breeze-Eastern Corporation and Senior Aerospace SSP representative (not by a consultant). The perjury statement shall be in the following format:

> "I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The State Board adopted regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, California Code of Regulation) requiring the electronic submittal of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found on the Internet at the following link:

http://www.waterboards.ca.gov/ust/electronic_submittal.

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Regional Board letters and orders issued to you or for the Site. However, the Regional Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker.

SO ORDERED.

for Paula Rasmussen
Samuel Unger, P.E.
Executive Officer

10-6-2014
Date

EXHIBIT B

FOURTH QUARTER 2006
GROUNDWATER MONITORING
AND SAMPLING REPORT
Former Stainless Steel Products Site
2980 San Fernando Boulevard
Burbank, California

FILE NO. 104.1005; SLIC ID N/

November 27, 2006

For submittal to:
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013

United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Prepared by:
The Source Group, Inc.
501 Marin Street, Suite 112B
Thousand Oaks, California 91360
(805) 373-9063

Prepared/Reviewed by:

Daniel Grasmick, P.E.
Principal Engineer

Reviewed by:

Frederick Clark, P.G.
Principal Geologist

FOURTH QUARTER 2006
GROUNDWATER MONITORING AND SAMPLING REPORT
Former Stainless Steel Products Site
2980 San Fernando Boulevard
Burbank, California
FILE NO. 104.1005; SLIC ID NO. 2040145

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1.0 INTRODUCTION

This report presents the results of quarterly groundwater monitoring activities for the Fourth Quarter 2006 conducted by The Source Group, Inc. (SGI) at the former Stainless Steel Products (SSP) Site located at 2980 North San Fernando Blvd. in Burbank, California (Site, Figure 1). Four quarters of groundwater monitoring are being performed in accordance with a United States Environmental Protection Agency (USEPA) and Los Angeles Regional Water Quality Control Board (LARWQCB) request as described in the USEPA's letter dated August 19, 2005. A response and clarification to the request for groundwater monitoring was transmitted to EPA and the RWQCB on November 30, 2005 (Musick et al., 2005). This quarterly groundwater monitoring report summarizes the fourth quarter groundwater gauging and sampling activities conducted on September 25, 2006

2.0 BACKGROUND

The site is located in an industrial / commercial area of Burbank, California. Numerous site investigation activities have occurred at the site since the mid-1980's. Site investigation activities have included soil gas surveys, soil boring and sampling, geoprobe installation, groundwater monitoring well installation, groundwater sampling, and other site assessment activities. The site investigation activities have targeted primarily organic compounds, including volatile organic compounds (VOCs), and other chemical constituents, such as metals. Approximately 90 soil borings (both direct push and hollow stem auger), soil vapor probes, and soil vapor extraction wells have been installed at the site since the mid-1980's. More than 300 soil samples have been collected during site investigation activities ranging in depth from surface samples to approximately 150 feet below grade surface (bgs)(Geraghty and Miller 1991, and Converse Consultants, 2004). A chronology of soil investigations at the site was provided in Conestoga-Rover and Associates (CRA) report entitled '*SSP Burbank, Revised Request for Closure Report*', dated November 2004. A soil vapor extraction system was operated at the site by CRA for an approximately four-year operational time interval. Closure of the soil vapor extraction remediation was accepted by the Los Angeles Water Board in 2005. In a letter dated April 12, 2005, the LARWQCB indicated there would be no further requirement for soil remediation at the site.

3.0 REGIONAL AND SITE HYDROGEOLOGY

The site is located within the east-central portion of the San Fernando Valley groundwater basin (California DWR, Bulletin 118, 2003). Groundwater within the basin is stored in the alluvial deposits that comprise the valley fill. Sediments within the western portion of the basin consist typically of fine-grained sands, silts, and clays that exhibit low permeability and low water yields. Groundwater in this area is nearer to the surface and transmitted at slower rate than in the coarser alluvium of the eastern portion of the valley. Groundwater characteristics range from unconfined in the eastern portion of the basin, to confined in the western portion. The groundwater generally flows away from the surrounding hills and mountains to percolate into the permeable portions of the alluvial fans. Regional groundwater flow direction is toward the southeast. The nearest surface drainage is the Burbank Western Channel, located northeast of the site. Flow in this concrete-lined channel is toward the southeast.

4.0 GROUNDWATER MONITORING AND SAMPLING

Methods for measuring depth to water, collecting groundwater samples, and performing laboratory analyses are presented below.

4.1 Depth to Water Measurements

The depth to static groundwater was measured prior to sampling in monitoring wells W-1, W-2, and W-3 on September 25, 2006. Water level data was recorded on the well gauging data forms and well monitoring data sheets (Appendix A). The location of each groundwater monitoring well is shown on Figure 2. Construction details for the groundwater monitoring wells located on the former SSP site are presented in Table 1.

4.2 Groundwater Sampling

During this quarterly monitoring period, groundwater samples were collected from the three onsite groundwater monitoring wells. Groundwater samples were collected on September 25, 2006 from monitoring wells W-1, W-2, and W-3. Groundwater samples and water level data were collected in general accordance with United States Environmental Protection Agency (USEPA) sampling guidance (USEPA, 1994).

A 2-inch diameter Grundfos submersible electric pump with new tubing was used for purging of each groundwater monitoring well (approximately 7.6 liter/min). During purging, the pH, temperature, specific conductance, turbidity, oxidation-reduction potential (ORP), and dissolved oxygen of purge water were monitored with in-line meters

and recorded on the sampling forms. Qualitative observations were also recorded. Purging continued until stabilization of water quality parameters (± 0.1 units for pH and ± 3% for specific conductance) was achieved. These parameters were measured to assess the stability of extracted groundwater. Stable field parameter measurements indicate that the groundwater samples collected are likely representative of in-situ groundwater conditions. Field measurement instruments were calibrated prior to their use. The calibration notes and the recorded field measurements are included on the well monitoring data sheets presented in Appendix A. The instrument calibration notes are presented on the Test Equipment Calibration Log (Appendix A). Groundwater monitoring well purge water was stored onsite in labeled 55–gallon drums until the final analytical laboratory summary reports were received and proper disposal was arranged. Purge water was picked up and transported to U.S. Filter Recovery Services in Los Angeles, CA for disposal on November 3, 2006.

Groundwater samples from each well were placed in analysis-specific containers. The sample containers were labeled with sample-point identification, project name, time and date of collection, and analyses desired. The samples were then placed on ice within an ice chest, and transported to the laboratory under standard chain-of-custody protocol. Copies of the chains of custody are provided with the laboratory reports in Appendix B.

A trip blank, provided by the analytical laboratory, was included with field samples during their transport back to the laboratory. The purpose of the trip blank was to assess potential contamination that may be introduced during shipping and field handling procedures. The trip blank was analyzed for VOCs using EPA method 8260B.

4.3 Laboratory Analysis

Samples collected during this quarterly monitoring event were submitted to American Environmental Testing Laboratory, Inc. of Burbank, California, a State-of-California certified analytical laboratory following chain-of-custody protocols. All groundwater samples collected during this quarter were analyzed for:

- Volatile organic compounds (VOCs) using EPA Method 8260B;
- 1,2,3-trichloropropane and 1,4-dioxane by EPA Method 8260B-SIM (or, 8260B Modified);
- CAM Title 22 Metals using EPA Methods 6010/7000 series;
- Calcium, iron, magnesium, manganese, potassium, and sodium using EPA Method 6010;
- Sulfide using EPA method 376.2;

- Chloride, fluoride, nitrate as N, nitrite as N, phosphate, and sulfate using EPA Method 300.0;
- Perchlorate using EPA Method 314.0;
- Total Dissolved Solids using EPA Method 160.1;
- Hexavalent Chromium using EPA Method 7199; and,
- N-Nitrosodimethylamine (NDMA) using EPA Method 1625M.

The required sample volumes for CAM Title 22 Metals analyses were field-filtered with 0.45 micron filters by the groundwater sampling contractor prior to analyses. Photocopies of the laboratory summary reports and chain-of-custody records are included in Appendix B.

5.0 RESULTS OF WATER-LEVEL MEASUREMENTS

Depth to water measurements in groundwater monitoring wells this quarter were 217.17, 218.70, and 222.46 feet below the top of casing in wells W-1, W-2, and W-3, respectively. The calculated groundwater surface elevations underlying the site ranged from 470.24 feet above mean sea level (MSL) to 475.06 feet above MSL.

The depth to water measurements and calculated groundwater elevations in each monitoring well this quarter are presented in Table 2. A groundwater contour map illustrating the interpreted potentiometric surface for this quarterly monitoring period is presented on Figure 2. Based solely on these depth-to-water measurements, the direction of groundwater flow is estimated to be generally to the west. The hydraulic gradient is estimated to be approximately 0.020 ft/ft. A limited data set of groundwater elevation data was available at the time this report was prepared. The spatial relationship of well locations W-1, W-2, and W-3 is not ideal for calculating a representative groundwater gradient for the Site. As a result, the estimates of groundwater flow direction and hydraulic gradient calculated using data from the three on-site wells may not be indicative of regional groundwater flow direction and gradient. Historic estimates of groundwater flow direction at the former SSP site and adjoining properties have been generally to the south (Dames and Moore, 1995, and Golden State Environmental, 2005).

6.0 RESULTS OF CHEMICAL ANALYSES

The following sections summarize the laboratory analytical results from groundwater samples obtained as part of this quarterly monitoring event.

6.1 Volatile Organic Compounds

Eight volatile organic compounds were detected in groundwater samples obtained from groundwater monitoring wells at the Site during this monitoring period. These VOCs are carbon tetrachloride, chloroform, 1,1-dichloroethane, 1,1-dichloroethene, cis-1,2-dichloroethene, tetrachloroethene (PCE), 1,1,1-trichloroethane, and trichloroethene (TCE). No other VOCs were detected in groundwater samples collected this quarter. Groundwater analytical results for VOCs are summarized in Table 3.

Carbon tetrachloride Carbon tetrachloride was detected in all three wells during this quarter at concentrations ranging from 5.5 to 12.0 microgram/liter (µg/L). These concentrations are above the California Department of Health Services (DHS) Primary Maximum Contaminant Level (MCL) for carbon tetrachloride of 0.5 µg/L.

Chloroform Chloroform was detected in all three groundwater monitoring wells during this quarter at concentrations ranging from 2.3 to 16.4 µg/L. These concentrations are below the DHS Primary MCL for chloroform (total trihalomethanes) of 100 µg/L.

1,1-Dichloroethane 1,1-Dichloroethane was detected in groundwater monitoring wells W-3 and W-2 during this quarter at concentrations of 7.4 and 9.2 µg/L, respectively. These concentrations are above the DHS Primary MCL for 1,1-dichloroethane of 5 µg/L.

1,1-Dichloroethene 1,1-Dichloroethene was detected in all three groundwater monitoring wells during this quarter at concentrations ranging from 36.3 to 159 µg/L. These concentrations are above the DHS Primary MCL for 1,1-dichloroethene of 6 µg/L.

cis-1,2-Dichloroethene cis-1,2-Dichloroethene was detected in groundwater monitoring wells W-2 and W-3 during this quarter at concentrations of 20.3 and 20.8 µg/L, respectively. These concentrations are above the DHS Primary MCL for cis-1,2-dichloroethene of 6 µg/L.

Tetrachloroethene Tetrachloroethene was detected in all three groundwater monitoring wells during this quarter at concentrations ranging from 120 to 785 µg/L. These concentrations are above the DHS Primary MCL for tetrachloroethene of 5 µg/L.

1,1,1-Trichloroethane 1,1,1-Trichloroethane was detected in groundwater monitoring wells W-2 and W-3 during this quarter at concentrations of 0.8 (flagged with a "J", which denotes the concentration is estimated) and 3.6 µg/L, respectively. These concentrations are below the DHS Primary MCL for 1,1,1-trichloroethane of 200 µg/L.

Trichloroethene Trichloroethene was detected in all three groundwater monitoring wells during this quarter at concentrations ranging from 372 to 2,990 µg/L. These concentrations are above the DHS Primary MCL for trichloroethene of 5 µg/L.

6.2 Emergent Chemicals

The following compounds, identified as emergent chemicals of concern by the California State Water Board, were analyzed for in samples obtained from groundwater monitoring wells W-1, W-2, and W-3:

- Hexavalent Chromium (CrVI);
- Perchlorate;
- 1,2,3-Trichloropropane (1,2,3-TCP);
- 1,4-Dioxane; and,
- N-nitrosodimethylamine (NDMA)

Groundwater analytical results for emergent chemicals of concern are summarized in Table 4. A photocopy of the laboratory summary report is provided in Appendix B. Hexavalent chromium was the only emergent chemical of concern detected at the site during this monitoring period. Hexavalent chromium was detected in all three wells during this monitoring period at concentrations ranging from 7.9 to 31.1 µg/L. These concentrations are below the California DHS Primary MCL for chromium of 50 µg/L. . Perchlorate, 1,2,3-TCP, 1,4-Dioxane, and NDMA were not detected during this monitoring period.

6.3 CAM Title 22 Listed Metals

Groundwater analytical results for CAM Title 22 listed metals during this monitoring period are summarized in Table 5. A photocopy of the laboratory summary report for CAM Title 22 listed metals is provided in Appendix B. Four of the 17 CAM Title 22 listed metals were detected in water samples obtained from monitoring wells at the site. The

CAM Title 22 listed metals that were detected included barium, chromium, molybdenum, and zinc. Of the four metals, barium and molybdenum were detected above their respective reported practical quantitation limit (PQL). Chromium and zinc were detected above their respective method detection limit (MDL) reported for each metal, but below the corresponding PQL. Consequently, the dissolved concentrations reported by the analytical laboratory for chromium and zinc are presented as "estimates," and are flagged with the letter J. Concentrations of detected CAM Title 22 listed metals were all below their respective California DHS Primary or Secondary MCL.

6.4 General Minerals Analysis – Cations and Anions

Groundwater analytical results for general minerals, including both cationic and anionic species, during this monitoring period are summarized in Tables 6 and 7, respectively. Cationic general mineral species detected in groundwater samples obtained from W-1, W-2, and W-3 included calcium, iron, magnesium, manganese, potassium, and sodium. With the exception of iron and manganese, none of these cationic general mineral species have promulgated California DHS MCLs or Notification Levels. Iron and manganese were not detected at concentrations above their respective California DHS Secondary MCL or Notification Level.

Anion general mineral species detected in groundwater samples obtained from W-1, W-2, and W-3 included chloride, fluoride, nitrate, nitrite, phosphate, sulfide, and sulfate. The detected concentrations were below their respective California DHS Primary and Secondary MCLs.

Groundwater analytical results for total dissolved solids (TDS), using EPA method 160.1, are also summarized in Table 7. The detected concentrations of TDS are above the respective California DHS Secondary MCL of 500 mg/liter in groundwater monitoring wells W-1 and W-2.

6.5 Data Quality Assessment

A review of the laboratory's internal QA/QC analysis of analytical method blanks, laboratory control standards (LCS), and matrix spike/matrix spike duplicate (MS/MSD) samples indicate no deviations from internal laboratory QC limits. Laboratory QA/QC data is included with the analytical data presented in Appendix B.

An evaluation of the trip blank that accompanied groundwater samples from the field to the laboratory indicates no evidence of potential VOC cross-contamination during transport of samples.

7.0 DISCUSSION AND CONCLUSION OF 2006 QUARTERLY RESULTS

7.1 Groundwater Elevation and Flow Direction

Based on available data from the three on-site wells, the interpreted direction of groundwater flow this quarter is estimated to be to the west at a gradient estimated to be approximately 0.021 ft/ft. However, because calculation of groundwater flow direction and hydraulic gradient were based on groundwater elevation data from the three on-site wells, estimates of flow direction and gradient may not be representative of regional groundwater conditions. For example, groundwater flow direction was calculated to be to the south or southwest in April 2005 in the southern portion of the Weber Property, located north of the former SSP Site (Golden State Environmental, 2005). Groundwater gradient on the Weber site was estimated to be 0.003 ft/ft in the southern portion of the Weber property. Historically, groundwater flow direction was characterized as being to the southeast at the former SSP Site in 1995 (Dames and Moore, 1995). Properties to the west, north, and northeast of the former SSP site were indicated to be upgradient of the SSP Site (Dames & Moore, 1995).

7.2 Groundwater Quality

The detection of chlorinated VOCs in groundwater samples this quarter are generally consistent with historical groundwater monitoring and sampling events completed at the site. Six individual VOCs were detected at concentrations exceeding drinking water standards or notification levels in samples obtained from the three onsite wells, including:

- Carbon tetrachloride;
- 1,1-Dichloroethane;
- 1,1-Dichloroethene;
- cis-1,2-Dichloroethene;
- Tetrachloroethene (PCE); and,
- Trichloroethene (TCE).

PCE, TCE, and 1,1-Dichloroethene were the three most prominent VOCs detected in water samples obtained from the on-site groundwater monitoring wells. PCE concentrations detected during Fourth Quarter 2006 were the same order-of-magnitude as historic PCE concentrations detected in the three on-site groundwater monitoring wells. Concentrations of TCE detected during Fourth Quarter 2006 in groundwater monitoring wells W-2 and W-3 were slightly higher, but the same order-of-magnitude, as historic groundwater concentrations of TCE. The TCE concentration detected in W-1

Third Quarter 2006 was comparable to historic concentrations. Based on the analytical results of the four recent on-site groundwater monitoring sampling events, groundwater concentrations of VOCs have been relatively constant during 2006.

Based on extensive subsurface assessment and characterization activities completed at the site to date (A.L. Burke, 1988-1989, Geraghty and Miller, 1991, Dames and Moore, 1993 & 1996, and Converse Consultants, 2004), PCE was identified as the primary VOC of concern in on-site soils. PCE impacts to soil underlying the site were at depths less than 90 feet bgs. VOCs, with the exception of PCE, are present in groundwater beneath the Site, but were not present in significant concentrations in Onsite Soils. TCE, detected at concentrations ranging from 557 to 3,680 ug/liter in groundwater, was not detected in onsite soils (A.L. Burke, 1988-1989, and Geraghty and Miller, 1991). Historic site investigation results indicate that the VOCs present in groundwater beneath the Site originated from off-site sources (Dames and Moore, 1994, Dames and Moore, 1995).

Of the five chemical constituents identified as "emergent chemicals of concern", none of these constituents were detected at concentrations greater than their respective California DHS Primary MCL or Notification Level for drinking water in this round of groundwater sampling and monitoring. Of the five emergent chemicals of concern tested for at the Site, only hexavalent chromium and 1,4-dioxane have been detected above their respective California DHS Primary MCL or Notification level, and each only once during one of the four groundwater sampling events completed in 2006.

Neither total chromium nor hexavalent chromium were detected during the first, second, and fourth monitoring events at concentrations above MCLs. During the third quarterly sampling and monitoring event, hexavalent chromium was detected in monitoring well W-3 at a concentration of 51.1 ug/L (The California DHS Primary MCL for chromium is 50.0 ug/L). Past soil investigations completed at the site (Geraghty and Miller, 1991 and Converse Consultants, 2004) have not detected hexavalent chromium in soil samples, and relatively low total chromium concentrations in soil. Based on the analytical results reported in 71 soil samples by Converse Consultants (2004), the average and maximum concentrations of total chromium detected in on-site soils was 6.6 mg/kg and 29.7 mg/kg, respectively. Based on these results, soils at the Site are not a potential source of chromium to groundwater.

1,4-Dioxane was not detected during the first, second, and fourth monitoring events at concentrations above California DHS Notification Level established for this compound. During the second quarterly sampling and monitoring event, 1,4-dioxane was detected in

monitoring well W-3 at a concentration of 3.25 ug/L (The California DHS Notification level for 1,4-dioxane is 3.0 ug/L).

Four rounds of groundwater sampling and monitoring have been completed at the former SSP Site in 2006. Based upon the laboratory analytical results from the January 11, April 27, July 6, and September 25, 2006 sampling events, the following conclusions can be made regarding the general chemistry of groundwater underlying the site:

- Groundwater analytical results for general minerals, including both cationic and anionic species show little variability over time and between groundwater monitoring wells. None of the cationic or anionic general mineral species exceed promulgated California DHS Primary MCLs or Notification Levels.
- Groundwater analytical results for CAM Title 22 listed metals show little variability over time and between groundwater monitoring wells. With the exception of chromium, none of the CAM Title 22 listed metals exceed their promulgated California DHS MCLs or Notification Levels.
- Of the five emergent chemicals of concern tested for at the Site, only hexavalent chromium and 1,4-dioxane have been detected above their respective California DHS Primary MCL or Notification level, and only during one of the four groundwater sampling events.
- Six VOCs were detected in groundwater underlying the Site at levels that exceed their promulgated California DHS MCLs or Notification Levels. In 2006, groundwater analytical results for detected VOCs show little variability over time in individual groundwater monitoring wells.

Four quarters of groundwater monitoring and sampling have been performed at the former SSP Burbank site in accordance with a United States Environmental Protection Agency (USEPA) and Los Angeles Regional Water Quality Control Board (LARWQCB) request as described in the USEPA's letter dated August 19, 2005. The purpose of groundwater monitoring and sampling requested by the USEPA was to establish current groundwater conditions at the former SSP Burbank Site. VOCs continue to be present in Site wells at relatively stable concentrations over time. Emergent chemicals, such as Hexavalent Chromium (CrVI), Perchlorate, 1,2,3-Trichloropropane (1,2,3-TCP), 1,4-Dioxane, and N-nitrosodimethylamine (NDMA) were not detected in groundwater samples, or were at or below regulatory action levels (MCLs or Notification Levels) established for each chemical. Other organic and inorganic parameters that were tested for in groundwater exhibited relatively stable concentrations over the four quarterly groundwater sampling and monitoring events. Based on the findings and conclusions summarized above, no additional quarterly groundwater monitoring and sampling is

necessary to assess and characterize the current condition of groundwater underlying the Site.

8.0 LIMITATIONS AND PROFESSIONAL CERTIFICATION

This report has been prepared for the exclusive use by SSP Industries, Inc. and The Uhlmann Offices, Inc. as it pertains to the former SSP Site located at 2980 North San Fernando Boulevard, in Burbank, California. Services have been performed using that degree of care and skill ordinarily exercised under similar circumstances by reputable qualified environmental consultants practicing at this or similar locations. No other warranty, either expressed or implied, is made as to any professional advice included in this report. These services were performed consistent with the agreements between SGI, Former SSP Industries, Inc., and The Uhlmann Offices, Inc.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the clients, purposes, locations, time frames, and project parameters indicated. SGI does not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

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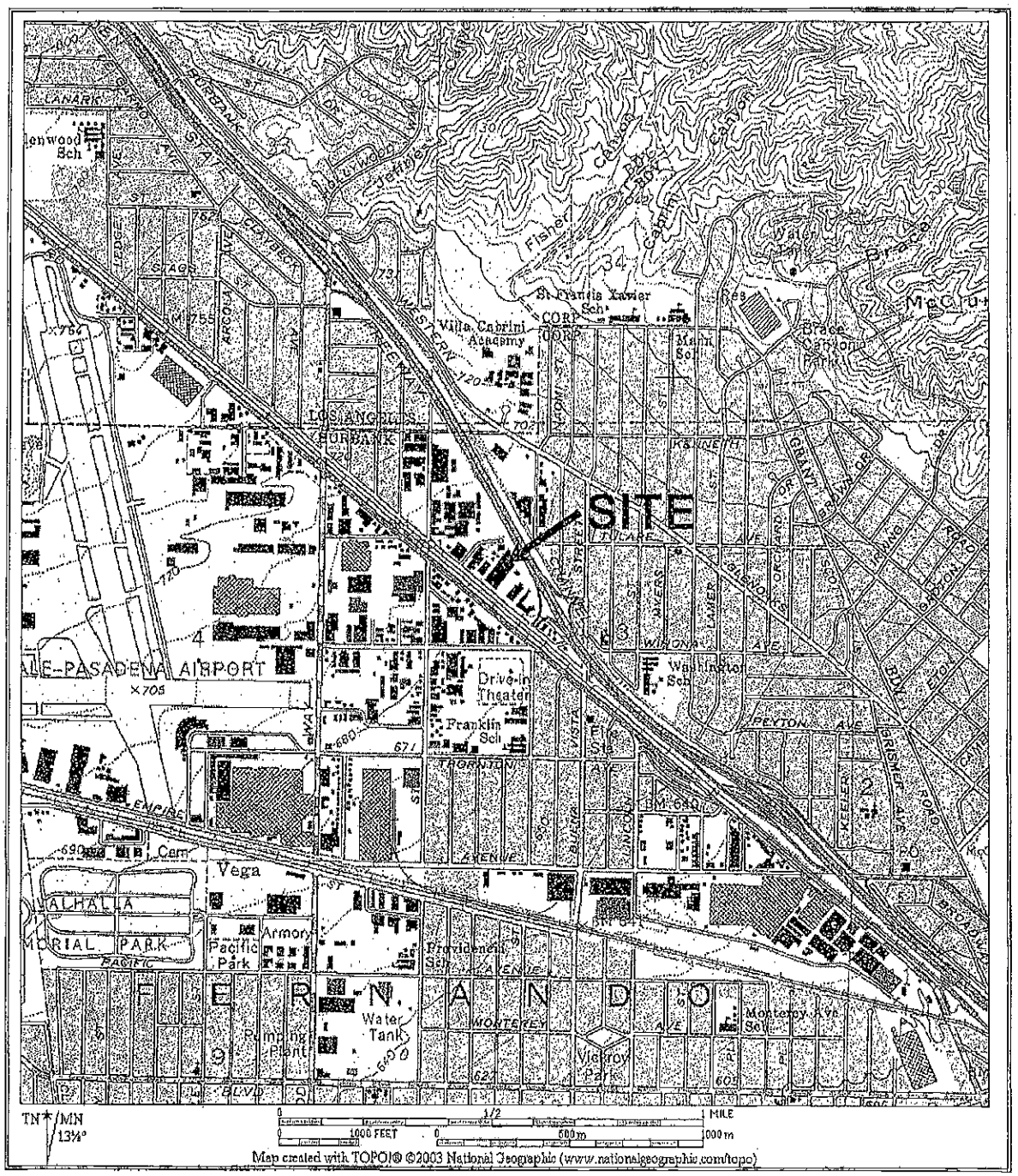
FIGURES

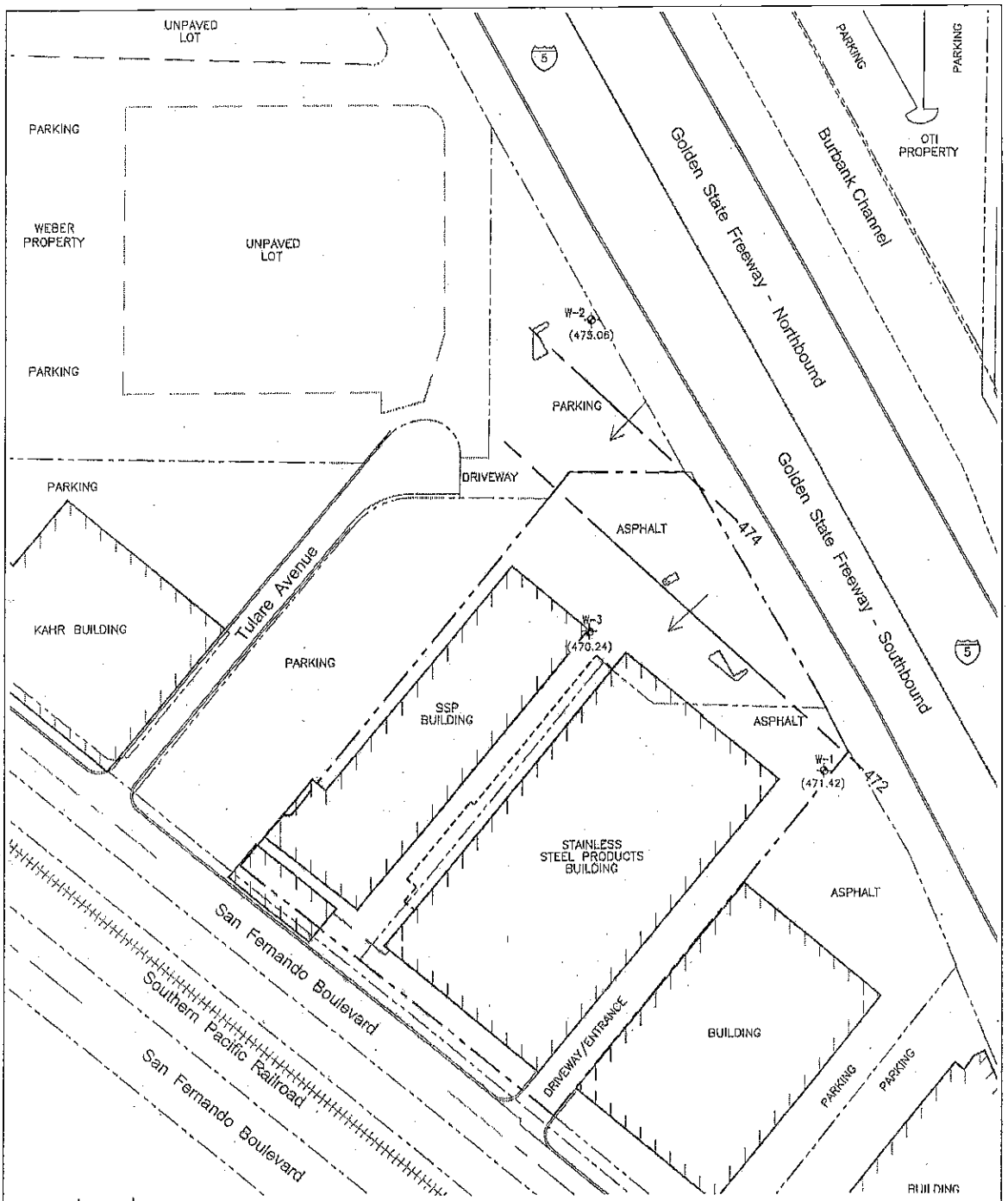


Source: U.S.G.S. 7.5-Minute Series Topographic Maps
Burbank, CA Quadrangle, 1966, Photorevised 1972

Site Address: 2980 North San Fernando Boulevard, Burbank, CA

DRAFTED BY: SE	CHECKED BY: DG	PROJECT NO: 02-SSP-001	FIGURE NO: 1	SITE ID: Former SSP Industries
DWG DATE: 3/28/06	REV. DATE: N/A	CLIENTS: SSP Industries, Inc. The Uhlmann Offices, Inc.	TITLE: SITE LOCATION MAP	
FILE NAME: Figure 1 - Site Location Map.doc				

SGI environmental THE SOURCE GROUP, INC.
501 Marin Street
Suite 112B
Thousand Oaks, CA 91360



Legend

- APPROXIMATE SITE PROPERTY LINE
- APPROXIMATE AREA PROPERTY LINE
- APPROXIMATE CENTER LINE OF STREET
- W-3 GROUNDWATER MONITORING WELL

Groundwater Monitoring Legend

(470.24) GROUNDWATER ELEVATION IN FEET ABOVE MEAN SEA LEVEL (AMSL)

LINE OF EQUAL GROUNDWATER ELEVATION, DASHED WHERE INFERRED, ARROW INDICATES DIRECTION OF GROUNDWATER FLOW.

Notes:

1. PROPERTY LINE LOCATIONS FROM LOS ANGELES COUNTY ASSESSOR'S OFFICE ON-LINE GIS DATABASE. BUILDINGS AND OTHER FEATURES LOCATED USING GEOREFERENCED IMAGERY FROM MS TERRASERVER ON-LINE GIS DATABASE, COPYRIGHT 2006.
2. GROUNDWATER MONITORING WELL LOCATIONS SURVEYED BY EVANS SURVEYING AND MAPPING ON JANUARY 11, 2006 AND ON APRIL 6, 2006, FOLLOWING MODIFICATIONS TO W-1 AND W-3.

N

0 100 200

APPROXIMATE SCALE IN FEET

DATE:	PROJECT NO.
11/06	02-SSP-001

Stainless Steel Products

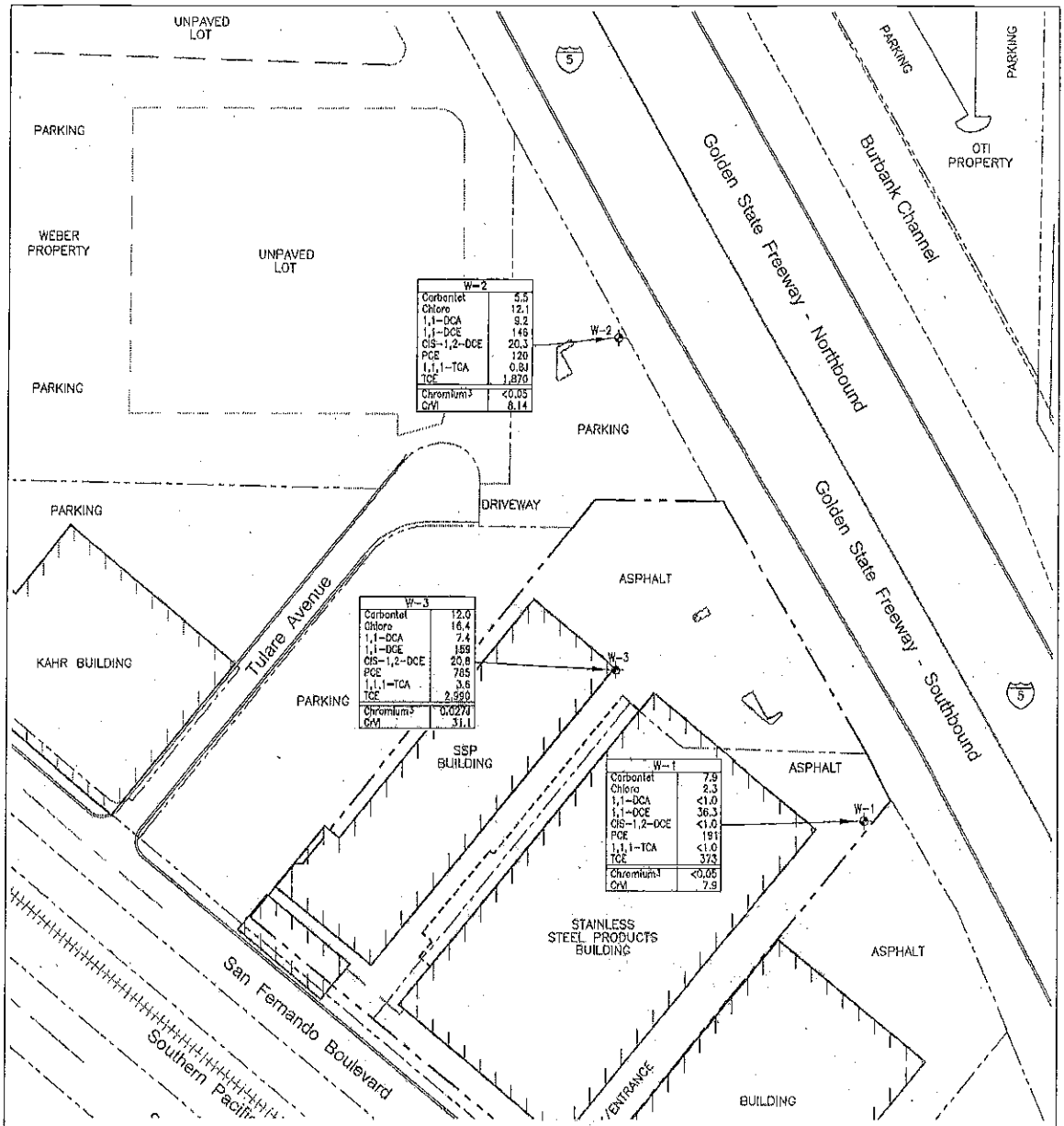
Groundwater Elevation Contour Map
Septembet 25, 2006

2880 North San Fernando Boulevard
Burbank, California

SGI environmental The Source Group, Inc.

FIGURE 2

FILENAME: 02-SSP-001W05-4.1106.DWG (1:1)



Legend

- APPROXIMATE SITE PROPERTY LINE
- APPROXIMATE AREA PROPERTY LINE
- APPROXIMATE CENTER LINE OF STREET
- W-3 GROUNDWATER MONITORING WELL

W-3	
Carbontet	CARBON TETRACHLORIDE
Chloro	CHLOROFORM
1,1-DCA	1,1-DICHLOROETHANE
1,1-DCE	1,1-DICHLOROETHENE
CIS-1,2-DCE	CIS-1,2-DICHLOROETHENE
PCE	TETRACHLOROETHENE
1,1,1-TCA	1,1,1-TRICHLOROETHANE
TCE	TRICHLOROETHENE
Chromium3	CAM 17 METAL (See Note 3)
CrVI	HEXAVALENT CHROMIUM

Notes:

1. PROPERTY LINE LOCATIONS FROM LOS ANGELES COUNTY ASSESSOR'S OFFICE ON-LINE GIS DATABASE. BUILDINGS AND OTHER FEATURES LOCATED USING GEOREFERENCED IMAGERY FROM MS TERRASERVER ON-LINE GIS DATABASE, COPYRIGHT 2006.
2. GROUNDWATER MONITORING WELL LOCATIONS SURVEYED BY EVANS SURVEYING AND MAPPING ON JANUARY 11, 2006 AND ON APRIL 6, 2006, FOLLOWING MODIFICATIONS TO W-1 AND W-3.
3. ALL RESULTS PRESENTED IN MICROGRAMS PER LITER (µg/L) EXCEPT CHROMIUM, WHICH IS PRESENTED IN MILLIGRAMS PER LITER (mg/L).
4. J DENOTES THAT THE ANALYTE WAS DETECTED ABOVE THE METHOD DETECTION LIMIT BUT BELOW THE PRACTICAL QUANTITATION LIMIT (CONCENTRATION ESTIMATED).
5. < DENOTES THAT THE ANALYTE WAS NOT DETECTED ABOVE ITS METHOD DETECTION LIMIT, WHICH IS SHOWN FOLLOWING THE LESS THAN SYMBOL.
6. ONLY DETECTED VOLATILE ORGANIC COMPOUNDS (VOCs) ARE LISTED. FOR COMPLETE LIST OF VOCs SCREENED FOR USING EPA METHOD 8260B, REFER TO SUMMARY REPORT (APPENDIX B).

0 100 200
APPROXIMATE SCALE IN FEET

DATE:	PROJECT NO.
11/06	02-SSP-001

Stainless Steel Products

Groundwater Analytical Results
September 25, 2006

2980 North San Fernando Boulevard
Burbank, California

SGI environmental | The Source Group, Inc.

FIGURE 3

FILENAME: 02-SSP-001\VOC06-4-1106.DWG (1:1)

TABLES

Table 1

Monitoring Well Construction Details

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Well Identification	Well Diameter (inches)	Total Depth (Feet)[1]	Screened Interval (Feet bgs)[2,3]	Top of Casing Elevation (feet msl)[4,5]
W-1	5	245.84	187 - 242	688.59
W-2	5	250.32	193 - 247	693.76
W-3	5	239.21	189 - 242	692.7

Notes:

1. Total depth as measured on September 25, 2006.
2. Screened intervals from original well construction logs.
3. bgs - below ground surface.
4. Well survey data for W-2 measured January 11, 2006. Well survey dta for W-1 & W-3 measured on April 6, 2006 after well casing modifications.
5. msl - mean seal level.

Table 2

Groundwater Elevations
September 25, 2006

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Well Identification	Top of Casing Elevation (feet msl)[1,2]	Depth to Groundwater (ft below TOC)[3]	Groundwater Elevation (feet msl)
September 25, 2006			
W-1	688.59	217.17	471.42
W-2	693.76	218.70	475.06
W-3	692.70	222.46	470.24

Notes:

1. msl - mean seal level.
2. Well survey data for W-2 measured January 11, 2006. Wells W-1 and W-3 re-measured April 6, 2006 after well casing modifications.
3. TOC - top of casing.

Table 3

Groundwater Analytical Results
Volatile Organic Compounds (VOCs) using EPA Method 8260B
Fourth Quarter 2006
Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte[1,2]							
		Carbon Tetrachloride	Chloroform	1,1-Dichloroethane (11-DCA)	1,1-Dichloroethene (11-DCE)	cis-1,2-Dichloroethene (cis-12-DCE)	Tetrachloroethene (PCE)	1,1,1-Trichloroethane (111-TCA)	Trichloroethene (TCE)
W-1	9/25/2006	**7.9**[3]	2.3	<1.0[4]	**36.3**	0.6 J[5]	**191**	<1.0	**372**
W-2	9/25/2006	**5.5**	**12.1**	**9.2**	**146**	**20.3**	**120**	0.8 J	**1,870**
W-3	9/25/2006	**12.0**	**16.4**	**7.4**	**159**	**20.8**	**785**	**3.6**	**2,990**
QCTB-1	9/25/2006	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Cal. DHS Drinking Water Standard for Analyte - MCL[6]		0.5	100	5	6	6	5	200	5

Notes:

1. All concentrations in micrograms per liter (ug/L).
2. Only detected VOCs are listed in table. For a complete list of VOCs screened for by EPA Method 8260B, please refer to the laboratory summary report (Appendix B).
3. Bold indicates detection of analyte above Cal. DHS Drinking Water Notification Level or Standard.
4. < - denotes analyte not detected above the noted practical quantitation limit.
5. J - denotes analyte was detected between Method Detection Limit (MDL) and Practical Quantitation Limit (PQL), and the concentration is estimated.
6. MCL - denotes value is a Cal. DHS Primary Maximum Contaminant Level - Primary MCL.

Table 4

Groundwater Analytical Results
Emergent Chemicals of Concern
Fourth Quarter 2006
Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte[1]				
		Hexavalent Chromium (CrVI)	Perchlorate (ClO_4)	1,2,3-Trichloropropane (123-TCP)	1,4-Dioxane	n-Nitrosodimethylamine (NDMA)
		Analytical Method				
		7199	314	5030 / 8260B-SIM	5030 / 8260B-SIM	1625M
		Reported Units				
		ug/liter	ug/liter	ug/liter	ug/liter	ng/liter
W-1	9/25/2006	7.86	<2[2]	<0.005	<2	<2
W-2	9/25/2006	8.14	<2	<0.005	<2	<2
W-3	9/25/2006	31.1	<2	<0.005	<2	<2
Cal. DHS Drinking Water Standard for Analyte		50 (MCL)[4]	6 (Notif. Level)[5]	0.005 (Notif. Level)	3 (Notif. Level)	10 (Notif. Level)

Notes:

1. Concentration units noted by analyte.
2. < - denotes analyte not detected above the noted practical quantitation limit.
3. Bold indicates detection of analyte above Cal. DHS Drinking Water Notification Level or Standard.
4. MCL - denotes value is a Cal. DHS Primary Maximum Contaminant Level.
5. Notif. Level - denotes value is a Cal. DHS Notification Level.

Table 5

Groundwater Analytical Results
CAM 17 Metals Using EPA Method 6010/7000 Series
Fourth Quarter 2006
Former SSP Site
2880 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte and Analytical Test Method[1]																
		EPA Method 6010																EPA Method 7470
		Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc	Mercury
W-1	9/25/2006	<0.1 [2]	<0.1	0.109	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	0.032 J[3]	<0.002
W-2	9/25/2006	<0.1	<0.1	0.098	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	0.01 J	<0.05	<0.1	<0.05	<0.1	<0.05	0.033 J	<0.002
W-3	9/25/2006	<0.1	<0.1	0.083	<0.05	<0.05	0.027 J	<0.05	<0.05	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	0.029 J	<0.002
Cal. DHS Drinking Water Standard for Analyte		0.006 (MCL)[4]	0.05 (MCL)	1.0 (MCL)	0.004 (MCL)	0.005 (MCL)	0.05 (MCL)	--	1.3 (MCL)	0.015 (MCL)	--	0.1 (MCL)	0.05 (MCL)	0.1 (2nd MCL)[5]	0.002 (MCL)	0.05 (Notif. Level)[6]	5 (2nd MCL)	0.002 (MCL)

Notes:

1. All concentrations in milligrams per liter (mg/L).
2. < - denotes analyte not detected above the noted practical quantitation limit.
3. J - denotes analyte was detected between Method Detection Limit (MDL) and Practical Quantitation Limit (PQL), and the concentration is estimated.
4. MCL - denotes value is a Cal. DHS Primary Maximum Contaminant Level - Primary MCL.
5. 2nd MCL - denotes MCL is a Cal. DHS Secondary MCL.
6. Notif. Level - denotes value is a Cal. DHS Notification Level.

Table 6

Groundwater Analytical Results
General Minerals - Cations; Using EPA Method 6010
Fourth Quarter 2006
Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte[1]					
		Calcium	Iron	Magnesium	Manganese	Potassium	Sodium
W-1	9/25/2006	83.2	<0.1[2]	26.7	<0.1	3.74	27.6
W-2	9/25/2006	88.3	<0.1	27.4	<0.1	4.71	41.3
W-3	9/25/2006	70.1	<0.1	21.9	<0.1	3.76	29.9
Cal. DHS Drinking Water Standard for Analyte		--[3]	0.3 (2nd MCL)[4]	--	0.5 (Notif. Level)[5]	--	--

Notes:

1. All concentrations in milligrams per liter (mg/L).
2. < - denotes analyte not detected above the noted practical quantitation limit.
3. '--' - No Drinking Water Standard available.
4. 2nd MCL - denotes MCL is a Cal. DHS Secondary MCL.
5. Notif. Level - denotes value is a Cal. DHS Notification Level.

Table 7

Groundwater Analytical Results
General Minerals - Anions and Dissolved Oxygen
Fourth Quarter 2006
Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Chloride	Fluoride	Nitrate as N	Nitrite as N	Sulfate	Sulfide	Phosphate	Total Dissolved Solids
		Analytical Method							
		300.0	300.0	300.0	300.0	300.0	376.2	300.0	160.1
		Reported Concentration Units							
		mg/liter	mg/liter	mg/liter	mg/liter	mg/liter	mg/liter	mg/liter	mg/liter
W-1	9/25/2006	52.7	0.15	9.25	<0.2[1]	98	<0.05	<0.03	566
W-2	9/25/2006	47.1	0.10	9.60	<0.2	106	<0.05	<0.03	546
W-3	9/25/2006	35.8	0.20	9.40	<0.2	62.2	<0.05	<0.03	468
Cal. DHS Drinking Water Standard for Analyte		250 (2nd MCL)[2]	2 (MCL)[3]	45 (MCL, as nitrate)	1 (MCL, as nitrite)	250 (2nd MCL)	--[4]	--	500 (2nd MCL)

Notes:

1. < - denotes analyte not detected above the noted practical quantitation limit.
2. 2nd MCL - denotes MCL is a Cal. DHS Secondary MCL.
3. MCL - denotes value is a Cal. DHS Primary Maximum Contaminant Level - Primary MCL.
4. '--' - No Drinking Water Standard available.

APPENDIX A

Groundwater Monitoring Field Sampling Forms

WELL GAUGING DATA

Project # 060925-mp-1 Date 9/25/06 Client The Source Group

Site 2980 San Fernando Blvd., Burbank

Well ID	Time	Well Size (in.)	Sheen / Odor	Depth to Immiscible Liquid (ft.)	Thickness of Immiscible Liquid (ft.)	Volume of Immiscibles Removed (ml)	Depth to water (ft.)	Depth to well bottom (ft.)	Survey Point: TOB or TOC	Notes
w-1	1010	5					217.17	245.20		
w-2	0955	5					218.70	246.37		
w-3	1025	5					222.46	238.40	↓	

WELL MONITORING DATA SHEET

Project #: 060825-mp-1	Site: The Source Group @ Burbank
Sampler: MP	Date: 9/25/06
Well I.D.: MW-1	Well Diameter: 2 3 4 6 8 5"
Total Well Depth (TD): 245.20	Depth to Water (DTW): 217.17
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: PVC Grade	Flow Cell Type YSI 556
DTW with 80% Recharge [(Height of Water Column x 0.20) + DTW]: 222.78	

Purge Method: Bailer, Disposable Bailer, Positive Air Displacement, Electric Submersible, Waterra, ~~Redi-flo pump~~, Extraction Pump, Other

Sampling Method: Bailer, Disposable Bailer, Extraction Port, ~~Dedicated Tubing~~, Other:

Flow Rate= 2 GPM

28.5 (Gals.) X 3 = 85.5 Gals.
1 Case Volume | Specified Volumes | Calculated Volume

Well Diameter	Multiplier	Well Diameter	Multiplier
1"	0.04	4"	0.65
2"	0.16	6"	1.47
3"	0.37	Other	radius² * 0.163

Time	Temp (°F)	pH	Cond. (mS or ~~µS~~)	Turbidity (NTUs)	D.O. (mg/L)	ORP (mV)	Gals. Removed	Observations
1406	71.81	7.7	887	3	8.67	12.2	14.0	DTW=218.62
1413	72.03	7.7	872	3	8.68	27.1	28.0	DTW=220.04
1420	72.07	7.7	868	3	8.48	30.8	42.0	DTW=220.67
1427	72.10	7.7	868	3	8.25	31.0	56.0	DTW=221.17
1434	72.14	7.7	868	3	8.14	30.6	70.0	DTW=221.45
1441	72.18	7.7	867	3	8.04	30.8	84.0	DTW=221.96
1443	72.18	7.7	868	3	8.03	30.8	86.0	DTW=222.18

Did well dewater? Yes ~~NO~~ Gallons actually evacuated: 86.0

Sampling Date: 9/25/06 Sampling Time: 1445 Depth to Water: 222.26

Sample I.D.: MW-1 Laboratory: ~~APEX~~

Analyzed for: TPH-G BTEX Other:

EB I.D. (if applicable): @ Time Duplicate I.D. (if applicable):

FB I.D. (if applicable): @ Time Analyzed for:

D.O. (if req'd):	Pre-purge:	mg/L	Post-purge:	mg/L
O.R.P. (if req'd):	Pre-purge:	mV	Post-purge:	mV

WELL MONITORING DATA SHEET

Project #: 060825-mp-1	Site: The Source Group @ Burbank
Sampler: MP	Date: 9/25/06
Well I.D.: W-2	Well Diameter: 2 3 4 6 8 (5")
Total Well Depth (TD): 246.57	Depth to Water (DTW): 218.70
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: PVC Grade	Flow Cell Type YSI 556
DTW with 80% Recharge [(Height of Water Column x 0.20) + DTW]: 224.03	

Purge Method: Bailer; Disposable Bailer; Positive Air Displacement; Electric Submersible; Waterra; (2" Reading pump); Extraction Pump; Other_____

Sampling Method: Bailer; Disposable Bailer; Extraction Port; (Dedicated Tubing); Other:_____

Flow Rate= 2 GPM

28.2 (Gals.) X 3 = 84.6 Gals.
1 Case Volume; Specified Volumes; Calculated Volume

Well Diameter	Multiplier	Well Diameter	Multiplier
1"	0.04	4"	0.65
2"	0.16	6"	1.47
3"	0.37	Other	radius² * 0.163

1.02

Time	Temp (°F)	pH	Cond. (mS or µS)	Turbidity (NTUs)	D.O. (mg/L)	ORP (mV)	Gals. Removed	Observations
1148	71.81	7.8	835	3	8.19	100.6	14.0	DTW = 222.63
1155	71.78	7.8	831	3	8.15	97.9	28.0	DTW = 222.82
1202	71.82	7.9	830	3	8.16	89.8	42.0	DTW = 223.08
1209	71.79	7.9	830	5	8.14	85.3	56.0	DTW = 223.20
1216	71.82	7.9	829	3	8.12	80.5	70.0	DTW = 223.51
1223	71.87	7.9	830	3	8.10	75.6	84.0	DTW = 223.69
1224	71.86	7.9	830	3	8.08	75.6	85.0	DTW = 223.90

Did well dewater? Yes (No) Gallons actually evacuated: 85.0

Sampling Date: 9/25/06 Sampling Time: 1225 Depth to Water: 223.90

Sample I.D.: W-2 Laboratory: (AETL)

Analyzed for: See S.O.W. Other:

EB I.D. (if applicable): @ Time Duplicate I.D. (if applicable):

FB I.D. (if applicable): @ Time Analyzed for:

D.O. (if req'd):	Pre-purge:	mg/L	Post-purge:	mg/L
O.R.P. (if req'd):	Pre-purge:	mV	Post-purge:	mV

WELL MONITORING DATA SHEET

Project #: 060925-mp-1	Site: The Science Group @ Benchmark
Sampler: MP	Date: 9/25/06
Well I.D.: W-3	Well Diameter: 2 3 4 6 8 5"
Total Well Depth (TD): 238.40	Depth to Water (DTW): 222.46
Depth to Free Product:	Thickness of Free Product (feet):
Referenced to: PVC Grade	Flow Cell Type YSI 556
DTW with 80% Recharge [(Height of Water Column x 0.20) + DTW]: 225.65	

Purge Method: Bailer, Disposable Bailer, Positive Air Displacement, Electric Submersible, Waterra, 2" Rediflo pump, Extraction Pump, Other

Sampling Method: Bailer, Disposable Bailer, Extraction Port, Dedicated Tubing, Other

Flow Rate= 2 gpm

16.3 (Gals.) X 3 = 48.9 Gals.
1 Case Volume | Specified Volumes | Calculated Volume

Well Diameter	Multiplier	Well Diameter	Multiplier
1"	0.04	4"	0.65
2"	0.16	6"	1.47
3"	0.37	Other	radius² * 0.163

Time	Temp (°F)	pH	Cond. (mS or µS)	Turbidity (NTUs)	D.O. (mg/L)	ORP (mV)	Gals. Removed	Observations
1559	72.28	7.8	711	49	8.13	15.1	8.0	DTW=222.89
1603	71.98	7.9	709	45	7.96	14.7	16.0	DTW=223.06
1607	71.69	7.9	708	22	7.89	16.8	24.0	DTW=223.28
1611	71.29	7.9	708	16	7.92	17.9	32.0	DTW=223.53
1615	71.42	7.9	709	16	7.89	20.3	40.0	DTW=223.92
1619	71.35	7.9	710	14	7.89	22.4	48.0	DTW=224.08
1619	71.35	7.9	709	14	7.90	22.5	49.0	DTW=224.10

Did well dewater? Yes (No) Gallons actually evacuated: 49.0 MP

Sampling Date: 9/25/06 Sampling Time: 1623 Depth to Water: 224.10

Sample I.D.: W-3 Laboratory: (ATL)

Analyzed for: See S.O.W Other:

EB I.D. (if applicable): @ Time Duplicate I.D. (if applicable):

FB I.D. (if applicable): @ Time Analyzed for:

D.O. (if req'd):	Pre-purge:	mg/L	Post-purge:	mg/L
O.R.P. (if req'd):	Pre-purge:	mV	Post-purge:	mV

BLAINE
TECH SERVICES, INC.

1680 ROGERS AVENUE
SAN JOSE, CALIFORNIA 95112-1105
FAX (408) 573-7771
PHONE (408) 573-0555

CHAIN OF CUSTODY BTS #

CLIENT: The Source Group

SITE: 2980 San Fernando

Burbank, CA

CONDUCT ANALYSIS TO DETECT

LAB: AEL

DHS #

SPECIAL INSTRUCTIONS

Invoice and Report to: The Source Group

Attn: Dan Grasmick

Fax copy of COC to Dan Grasmick upon receipt
(805) 373-9073

SAMPLE I.D.	DATE	TIME	MATRIX S = Soil W = H2O	CONTAINERS TOTAL	See Spread Sheet for Analyses and Hold Issues	ADD'L INFORMATION	STATUS	CONDITION	LAB SAMPLE #
W-1	9/25/06	1445	W	11	X				
W-2		1225			X				
W-3		1623			X				
QCTB-1		0845		2	X	VOC's only			

SAMPLING COMPLETED	DATE	TIME	SAMPLING PERFORMED BY	RESULTS NEEDED NO LATER THAN
	9/26/06		Michael Bullers B.T.S	

RELEASED BY: Michael Bullers	DATE	TIME	RECEIVED BY	DATE	TIME	
RELEASED BY	DATE	TIME	RECEIVED BY	DATE	TIME	
RELEASED BY	DATE	TIME	RECEIVED BY	DATE	TIME	
SHIPPED VIA	DATE SENT	TIME SENT	COOLER #			

Laboratory Analytical Requirements - SSP Burbank
4th Sampling Round - 2006
September 25, 2006

Analyte	Analytical Method	Number of Samples	Sample Status As of 9/21/2006
VOCs	8260B	4 (W-1, W-2, W-3, plus trip blank)	Analyze
1,2,3-TCP	524.2-SIM	3 (W-1, W-2, W-3)	Analyze
Title 22 Metals	6010/7000	3 (W-1, W-2, W-3)	Field Filtered (per Blaine Tech) Analyze
Hexavalent Chromium	7199	3 (W-1, W-2, W-3)	Field Filtered Analyze
1,4-Dioxane	8260-SIM	3 (W-1, W-2, W-3)	Analyze
NDMA	1625-M	3 (W-1, W-2, W-3)	Analyze
Perchlorate	314.1	3 (W-1, W-2, W-3)	Analyze
Dissolved Na, K, Ca, Mg	6010	3 (W-1, W-2, W-3)	F.F. Analyze
Sulfide	376.2	3 (W-1, W-2, W-3)	Analyze
Dissolved Fe, Mn	6010	3 (W-1, W-2, W-3)	F.F. Analyze
TDS	160.1	3 (W-1, W-2, W-3)	Analyze
Inorganics (Chloride, Nitrate, Nitrite, Sulfate)	300.0	3 (W-1, W-2, W-3)	Analyze
Inorganics (Fluoride, Phosphate)	300.0	3 (W-1, W-2, W-3)	Analyze
Electronic Deliverables	N/A	--	EDD in Geotracker Format

WELLHEAD INSPECTION CHECKLIST

Client The Source Group Date 9/25/06

Site Address 2980 San Fernando Blvd., Burbank

Job Number 060925-MP-1 Technician MP

Well ID	Well Inspected - No Corrective Action Required	WELL IS SECURABLE BY DESIGN (12" or less)	WELL IS CLEARLY MARKED WITH THE WORDS "MONITORING WELL" (12" or less)	Water Bailed From Wellbox	Wellbox Components Cleaned	Cap Replaced	Lock Replaced	Other Action Taken (explain below)	Well Not Inspected (explain below)	Repair Order Submitte
W-1	✓	✓	✓							
W-2	✓	✓	✓							
W-3	✓	✓	✓							

NOTES:

TEST EQUIPMENT CALIBRATION LOG

PROJECT NAME SSI Burbank				PROJECT NUMBER			
EQUIPMENT NAME	EQUIPMENT NUMBER	DATE/TIME OF TEST	STANDARDS USED	EQUIPMENT READING	CALIBRATED:	TEMP (C)	INITIALS
YSI 556 Flow cell	06F1362AS	9/25/06 1050	pH 4.0 7.0 10.0 Cond. 5000	4.00 6.89 10.03 3895	✓ ✓ ✓	25.23° 25.68 25.41° 25.37°	MP MP MP MP
			D.O. 100% ORP 231	100% 230.6	✓ ✓	25.17° 25.19	MP MP

APPENDIX B

Laboratory Data and Chain-of-Custody Forms

American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street, Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Ordered By

The Source Group, Inc.
290 West Hillcrest Drive Suite #220
Thousand Oaks, CA 91360

Telephone: (805)373-9063
Attention: Dan Grasmick

Number of Pages 20
Date Received 09/25/2006
Date Reported 10/13/2006

Job Number	Order Date	Client
39080	09/25/2006	SOURCE

Project ID: 060111DC1
Site: 2980 San Fernando Blvd.
Burbank, CA 91504

Enclosed please find results of analyses of 4 water samples which were analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: _____ Approved By: _____

Cyrus Razmara, Ph.D.
Laboratory Director

Job # 39080

BLAINE
TECH SERVICES, INC.

1680 ROGERS AVENUE
SAN JOSE, CALIFORNIA 95112-1105
FAX (408) 573-7771
PHONE (408) 573-0555

CHAIN OF CUSTODY BTS #

CLIENT: The Source Group

SITE: 2980 San Fernando

Burbank, CA

CONDUCT ANALYSIS TO DETECT

LAB: AEL

DHS #

SPECIAL INSTRUCTIONS

Invoice and Report to: The Source Group

Attn: Dan Grasmick

Fax copy of COC to Dan Grasmick upon receipt
(805) 373-9073

SAMPLE I.D.	DATE	TIME	MATRIX S = Soil W = H2O	CONTAINERS TOTAL	See Spread Sheet for Analyses and Hold issues	ADD'L INFORMATION	STATUS	CONDITION	LAB SAMPLE #
W-1	9/25/06	1445	W	11	X				39080.01
W-2		1225			X				39080.02
W-3		1623			X				39080.03
QCTB-1		0845		2	X	VOC 75 only			39080.04

SAMPLING COMPLETED: DATE 9/25/06 TIME

SAMPLING PERFORMED BY: Michael Phillips B.T.S

RESULTS NEEDED NO LATER THAN

RELEASED BY	DATE	TIME	RECEIVED BY	DATE	TIME
Michael Phillips	9/25/06	1730		9/29/06	1750
RELEASED BY	DATE	TIME	RECEIVED BY	DATE	TIME
RELEASED BY	DATE	TIME	RECEIVED BY	DATE	TIME

SHIPPED VIA | DATE SENT | TIME SENT | COOLER #

Laboratory Analytical Requirements - SSP Burbank
4th Sampling Round - 2006
September 25, 2006

Analyte	Analytical Method	Number of Samples	Sample Status As of 9/21/2006
VOCs	8260B	4 (W-1, W-2, W-3, plus trip blank)	Analyze
1,2,3-TCP	524.2-SIM	3 (W-1, W-2, W-3)	Analyze
Title 22 Metals	6010/7000	3 (W-1, W-2, W-3)	Field Filtered (per Blaine Tech) Analyze
Hexavalent Chromium	7199	3 (W-1, W-2, W-3)	Field Filtered Analyze
1,4-Dioxane	8260-SIM	3 (W-1, W-2, W-3)	Analyze
NDMA	1625-M	3 (W-1, W-2, W-3)	Analyze
Perchlorate	314.1	3 (W-1, W-2, W-3)	Analyze
Dissolved Na, K, Ca, Mg	6010	3 (W-1, W-2, W-3)	F.F. Analyze
Sulfide	376.2	3 (W-1, W-2, W-3)	Analyze
Dissolved Fe, Mn	6010	3 (W-1, W-2, W-3)	~~Field~~ F.F. Analyze
TDS	160.1	3 (W-1, W-2, W-3)	Analyze
Inorganics (Chloride, Nitrate, Nitrite, Sulfate)	300.0	3 (W-1, W-2, W-3)	Analyze
Inorganics (Fluoride, Phosphate)	300.0	3 (W-1, W-2, W-3)	Analyze
Electronic Deliverables	N/A	--	EDD in Geotracker Format

American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street, Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

The Source Group, Inc.
299 West Hillcrest Drive
Suite #220
Thousand Oaks, CA 91360

Site

2980 San Fernando Blvd.
Burbank, CA 91504

Telephone: (805)373-9063
Attn: Dan Grasmick

Page: 2

Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 100206

Our Lab I.D.			Method Blank	39080.01	39080.02	39080.03	39080.04
Client Sample I.D.				W-1	W-2	W-3	QCTB-1
Date Sampled				09/25/2006	09/25/2006	09/25/2006	09/25/2006
Date Prepared			10/02/2006	10/02/2006	10/02/2006	10/02/2006	10/02/2006
Preparation Method			5030B	5030B	5030B	5030B	5030B
Date Analyzed			10/02/2006	10/02/2006	10/02/2006	10/02/2006	10/02/2006
Matrix			Aqueous	Aqueous	Aqueous	Aqueous	Aqueous
Units			ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
Acetone	10	10	ND	ND	ND	ND	ND
Benzene	0.5	1.0	ND	ND	ND	ND	ND
Bromobenzene (Phenyl bromide)	0.5	1.0	ND	ND	ND	ND	ND
Bromochloromethane	0.5	1.0	ND	ND	ND	ND	ND
Bromodichloromethane	0.5	1.0	ND	ND	ND	ND	ND
Bromoform (Tribromomethane)	2.5	5.0	ND	ND	ND	ND	ND
Bromomethane (Methyl bromide)	1.5	3.0	ND	ND	ND	ND	ND
2-Butanone (MEK)	5.0	5.0	ND	ND	ND	ND	ND
n-Butylbenzene	0.5	1.0	ND	ND	ND	ND	ND
sec-Butylbenzene	0.5	1.0	ND	ND	ND	ND	ND
tert-Butylbenzene	0.5	1.0	ND	ND	ND	ND	ND
Carbon Disulfide	0.5	1.0	ND	ND	ND	ND	ND
Carbon tetrachloride	0.5	1.0	ND	7.9	5.5	12.0	ND
Chlorobenzene	0.5	1.0	ND	ND	ND	ND	ND
Chloroethane	1.5	3.0	ND	ND	ND	ND	ND
2-Chloroethyl vinyl ether	2.5	5.0	ND	ND	ND	ND	ND
Chloroform (Trichloromethane)	0.5	1.0	ND	2.3	12.1	16.4	ND
Chloromethane (Methyl chloride)	1.5	3.0	ND	ND	ND	ND	ND
2-Chlorotoluene	0.5	1.0	ND	ND	ND	ND	ND
4-Chlorotoluene	0.5	1.0	ND	ND	ND	ND	ND
1,2-Dibromo-3-chloropropane (DBCP)	2.5	5.0	ND	ND	ND	ND	ND
Dibromochloromethane	0.5	1.0	ND	ND	ND	ND	ND
1,2-Dibromoethane (EDB)	0.5	1.0	ND	ND	ND	ND	ND
Dibromomethane	0.5	1.0	ND	ND	ND	ND	ND
1,2-Dichlorobenzene	0.5	1.0	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	0.5	1.0	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	0.5	1.0	ND	ND	ND	ND	ND
Dichlorodifluoromethane	1.5	3.0	ND	ND	ND	ND	ND
1,1-Dichloroethane	0.5	1.0	ND	ND	9.2	7.4	ND

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ANALYTICAL RESULTS

Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 100206

Our Lab I.D.			Method Blank	39080-01	39080-02	39080-03	39080-04
Client Sample I.D.				W-1	W-2	W-3	QCTB-1
Date Sampled				09/25/2006	09/25/2006	09/25/2006	09/25/2006
Date Prepared			10/02/2006	10/02/2006	10/02/2006	10/02/2006	10/02/2006
Preparation Method			5030B	5030B	5030B	5030B	5030B
Date Analyzed			10/02/2006	10/02/2006	10/02/2006	10/02/2006	10/02/2006
Matrix			Aqueous	Aqueous	Aqueous	Aqueous	Aqueous
Units			ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor			1	1	1	1	1
Analytes	MDL	PQL	Results	Results	Results	Results	Results
1,2-Dichloroethane (EDC)	0.5	1.0	ND	ND	ND	ND	ND
1,1-Dichloroethene	0.5	1.0	ND	36.3	146	159	ND
cis-1,2-Dichloroethene	0.5	1.0	ND	0.6J	20.3	20.8	ND
trans-1,2-Dichloroethene	0.5	1.0	ND	ND	ND	ND	ND
1,2-Dichloropropane	0.5	1.0	ND	ND	ND	ND	ND
1,3-Dichloropropane	0.5	1.0	ND	ND	ND	ND	ND
2,2-Dichloropropane	0.5	1.0	ND	ND	ND	ND	ND
1,1-Dichloropropene	0.5	1.0	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	0.5	1.0	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	0.5	1.0	ND	ND	ND	ND	ND
Ethylbenzene	0.5	1.0	ND	ND	ND	ND	ND
Hexachlorobutadiene	1.5	3.0	ND	ND	ND	ND	ND
2-Hexanone	2.5	5.0	ND	ND	ND	ND	ND
Isopropylbenzene	0.5	1.0	ND	ND	ND	ND	ND
p-Isopropyltoluene	0.5	1.0	ND	ND	ND	ND	ND
4-Methyl-2-pentanone (MIBK)	2.5	5.0	ND	ND	ND	ND	ND
Methyl-tert-butyl ether (MTBE)	0.5	1.0	ND	ND	ND	ND	ND
Methylene chloride (DCM)	2.0	4.0	ND	ND	ND	ND	ND
Naphthalene	0.5	1.0	ND	ND	ND	ND	ND
n-Propylbenzene	0.5	1.0	ND	ND	ND	ND	ND
Styrene	0.5	1.0	ND	ND	ND	ND	ND
1,1,1,2-Tetrachloroethane	0.5	1.0	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	0.5	1.0	ND	ND	ND	ND	ND
Tetrachloroethene	0.5	1.0	ND	191	120	785	ND
Toluene (Methyl benzene)	0.5	1.0	ND	ND	ND	ND	ND
1,2,3-Trichlorobenzene	0.5	1.0	ND	ND	ND	ND	ND
1,2,4-Trichlorobenzene	0.5	1.0	ND	ND	ND	ND	ND
1,1,1-Trichloroethane	0.5	1.0	ND	ND	0.8J	3.6	ND
1,1,2-Trichloroethane	0.5	1.0	ND	ND	ND	ND	ND
Trichloroethene	0.5	1.0	ND	372	1,870	2,990	ND
Trichlorofluoromethane	0.5	1.0	ND	ND	ND	ND	ND
1,2,3-Trichloropropane	0.5	1.0	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	0.5	1.0	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	0.5	1.0	ND	ND	ND	ND	ND
Vinyl Acetate	0.5	5.0	ND	ND	ND	ND	ND
Vinyl chloride (Chloroethene)	0.5	3.0	ND	ND	ND	ND	ND

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ANALYTICAL RESULTS

Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 100206

Our Lab I.D.			Method Blank	39080-01	39080-02	39080-03	39080-04
Client Sample I.D.				W-1	W-2	W-3	QCTB-1
Date Sampled				09/25/2006	09/25/2006	09/25/2006	09/25/2006
Date Prepared			10/02/2006	10/02/2006	10/02/2006	10/02/2006	10/02/2006
Preparation Method			5030B	5030B	5030B	5030B	5030B
Date Analyzed			10/02/2006	10/02/2006	10/02/2006	10/02/2006	10/02/2006
Matrix			Aqueous	Aqueous	Aqueous	Aqueous	Aqueous
Units			ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor			1	1	1	1	1
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**	**Results**	**Results**
o-Xylene	0.5	1.0	ND	ND	ND	ND	ND
m,p-Xylenes	1.0	2.0	ND	ND	ND	ND	ND
Our Lab I.D.			**Method Blank**	**39080-01**	**39080-02**	**39080-03**	**39080-04**
Surrogates	**%Rec Limit**		**% Rec**	**% Rec**	**% Rec**	**% Rec**	**% Rec**
Bromofluorobenzene	75-125		110	108	110	108	108
Dibromofluoromethane	75-125		105	103	100	100	103
Toluene-d8	75-125		103	105	105	105	105

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299 West Hillcrest Drive
Suite #220
Thousand Oaks, CA 91360

Site

2980 San Fernando Blvd
Burbank, CA 91504

Telephone: (805)373-9063
Attn: Dan Grasmick

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 8260B-SIM, 1,2,3-TCP and 1,4-Dioxane by GC/MS SIM (8260B Modified)

QC Batch No: 100406

Our Lab I.D.			Method Blank	39080-01	39080-02	39080-03	
Client Sample I.D.				W-1	W-2	W-3	
Date Sampled				09/25/2006	09/25/2006	09/25/2006	
Date Prepared			10/04/2006	10/04/2006	10/04/2006	10/04/2006	
Preparation Method			5030B	5030B	5030B	5030B	
Date Analyzed			10/04/2006	10/04/2006	10/04/2006	10/04/2006	
Matrix			Aqueous	Aqueous	Aqueous	Aqueous	
Units			ug/L	ug/L	ug/L	ug/L	
Dilution Factor			1	1	1	1	
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**	**Results**	
1,4-Dioxane	2.0	2.0	ND	ND	ND	ND	
1,2,3-Trichloropropane	0.005	0.005	ND	ND	ND	ND	
Our Lab I.D.			**Method Blank**	**39080-01**	**39080-02**	**39080-03**	
Surrogates	**%Rec Limit**		**% Rec**	**% Rec**	**% Rec**	**% Rec**	
Toluene-d8	60-130		82	97	109	105	

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Suite #220
Thousand Oaks, CA 91360-

Telephone: (805) 373-9063
Attn: Dan Grasmick

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Analytes			Total Dissolved Solids	Chloride	Fluoride	Nitrate as Nitrogen
Methods of Analyses			160.1	300.0	300.0	300.0
Date Prepared			09/26/2006	09/26/2006	09/26/2006	09/26/2006
Date Analyzed			09/26/2006	09/26/2006	09/26/2006	09/26/2006
Matrix			Aqueous	Aqueous	Aqueous	Aqueous
QC Batch Number			092606	092606	092606	092606
Units			mg/L	mg/L	mg/L	mg/L
Method Detection Limit			10	0.02	0.01	0.02
Practical Quantitation Limit			10	0.20	0.10	0.20
Dilution Factor			1	1	1	1
Lab ID	Sample ID	Sampled	Results	Results	Results	Results
39080.01	W-1	09/25/2006	568	52.7	0.15	9.25
39080.02	W-2	09/25/2006	548	47.1	0.10	9.60
39080.03	W-3	09/25/2006	468	35.6	0.20	9.40
N/A	Method Blank	/ /	ND	ND	ND	ND

Analytes			Nitrite as Nitrogen	Phosphate	Sulfate	Perchlorate
Methods of Analyses			300.0	300.0	300.0	314.0
Date Prepared			09/26/2006	09/26/2006	09/26/2006	09/26/2006
Date Analyzed			09/26/2006	09/26/2006	09/26/2006	09/26/2006
Matrix			Aqueous	Aqueous	Aqueous	Aqueous
QC Batch Number			092606	092606	092606	092606
Units			mg/L	mg/L	mg/L	ug/L
Method Detection Limit			0.02	0.30	0.02	2.0
Practical Quantitation Limit			0.20	0.30	0.20	2.0
Dilution Factor			1	1	1	1
Lab ID	Sample ID	Sampled	Results	Results	Results	Results
39080.01	W-1	09/25/2006	ND	ND	98.0	ND
39080.02	W-2	09/25/2006	ND	ND	106	ND
39080.03	W-3	09/25/2006	ND	ND	62.2	ND
N/A	Method Blank	/ /	ND	ND	ND	ND

Analytes			Sulfide, total	Chromium (VI)	N-Nitrosodimethylamine	
Methods of Analyses			376.2	7199	1625M	
Date Prepared			09/26/2006	09/26/2006	10/02/2006	
Date Analyzed			09/26/2006	09/26/2006	10/03/2006	
Matrix			Aqueous	Aqueous	Aqueous	
QC Batch Number			092606	092606	100206	
Units			mg/L	ug/L	ng/L	
Method Detection Limit			0.01	2.0	2.0	
Practical Quantitation Limit			0.05	2.0	2.0	
Dilution Factor			1	1	1	
Lab ID	Sample ID	Sampled	Results	Results	Results	
39080.01	W-1	09/25/2006	ND	7.86	ND	

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ANALYTICAL RESULTS

Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Analytes			Sulfide, total	Chromium (VI)	N-Nitrosodimethylamine	
Methods of Analyses			376.2	7199	1625M	
Date Prepared			09/26/2006	09/26/2006	10/02/2006	
Date Analyzed			09/26/2006	09/26/2006	10/03/2006	
Matrix			Aqueous	Aqueous	Aqueous	
QC Batch Number			092606	092606	100206	
Units			mg/L	ug/L	ng/L	
Method Detection Limit			0.01	2.0	2.0	
Practical Quantitation Limit			0.05	2.0	2.0	
Dilution Factor			1	1	1	
Lab ID	Sample ID	Sampled	Results	Results	Results	
39080.02	W-2	09/25/2006	ND	8.14	ND	
39080.03	W-3	09/25/2006	ND	31.1	ND	
N/A	Method Blank	/ /	ND	ND	ND	

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Site

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 6010/7000CAM, CAM Title 22 Metals (SW-846)

QC Batch No: 092906-1

Our Lab ID			Method Blank	39080-01	39080-02	39080-03	
Client Sample I.D.				W-1	W-2	W-3	
Date Sampled				09/25/2006	09/25/2006	09/25/2006	
Date Prepared			09/29/2006	09/29/2006	09/29/2006	09/29/2006	
Preparation Method			3005A	3005A	3005A	3005A	
Date Analyzed			09/29/2006	09/29/2006	09/29/2006	09/29/2006	
Matrix			Aqueous	Aqueous	Aqueous	Aqueous	
Units			mg/L	mg/L	mg/L	mg/L	
Dilution Factor			1	1	1	1	
Analytes	MDL	PQL	Results	Results	Results	Results	
Antimony	0.05	0.10	ND	ND	ND	ND	
Arsenic	0.05	0.10	ND	ND	ND	ND	
Barium	0.03	0.05	ND	0.109	0.098	0.083	
Beryllium	0.01	0.05	ND	ND	ND	ND	
Cadmium	0.01	0.05	ND	ND	ND	ND	
Chromium	0.01	0.05	ND	ND	ND	0.027J	
Cobalt	0.01	0.05	ND	ND	ND	ND	
Copper	0.01	0.05	ND	ND	ND	ND	
Lead	0.05	0.10	ND	ND	ND	ND	
Mercury (By EPA 7470)	0.001	0.002	ND	ND	ND	ND	
Molybdenum	0.01	0.05	ND	ND	0.010J	ND	
Nickel	0.01	0.05	ND	ND	ND	ND	
Selenium	0.05	0.10	ND	ND	ND	ND	
Silver	0.01	0.05	ND	ND	ND	ND	
Thallium	0.05	0.10	ND	ND	ND	ND	
Vanadium	0.03	0.05	ND	ND	ND	ND	
Zinc	0.01	0.05	ND	0.032J	0.033J	0.029J	

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Thousand Oaks, CA 91360

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 6010BSCAN, Ca, Fe, Mg, Mn, K, and Na by ICP

QC Batch No: 092906-1

Our Lab I.D.			Method Blank	39080-01	39080-02	39080-03	
Client Sample I.D.				W-1	W-2	W-3	
Date Sampled				09/25/2006	09/25/2006	09/25/2006	
Date Prepared			09/29/2006	09/29/2006	09/29/2006	09/29/2006	
Preparation Method			3005A	3005A	3005A	3005A	
Date Analyzed			09/29/2006	09/29/2006	09/29/2006	09/29/2006	
Matrix			Aqueous	Aqueous	Aqueous	Aqueous	
Units			mg/L	mg/L	mg/L	mg/L	
Dilution Factor			1	1	1	1	
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**	**Results**	
Calcium	0.25	0.50	ND	83.2	88.3	70.1	
Iron	0.05	0.10	ND	ND	ND	ND	
Magnesium	0.25	0.50	ND	26.7	27.4	21.9	
Manganese	0.05	0.10	ND	ND	ND	ND	
Potassium	0.50	1.00	ND	3.74	4.71	3.76	
Sodium	0.25	0.50	ND	27.6	41.3	29.9	

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Suite #220
Thousand Oaks, CA 91360

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 160.1, Total Dissolved Solids, Gravimetric, Dried at 180 C

QUALITY CONTROL REPORT

QC Batch No: 092606 Sample Spiked: 39094.01 QC Prepared: 09/26/2006 QC Analyzed: 09/26/2006

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit						
Total Dissolved Solids	1050	1030	1.9	<15						

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The Source Group, Inc.
299 WestHillcrest Drive
Suite#220
ThousandOaks, CA 91360

Site

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Burbank, CA 91504

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Attn: Dan Grasmick

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 300.0, Determination of Inorganic Anion in water by IC

QUALITY CONTROL REPORT

QC Batch No: 092606 Sample Spiked: 092606 QC Prepared: 09/26/2006 QC Analyzed: 09/26/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
Chloride	20.00	18.00	90	20.00	18.20	91	1.1	80-120	<20	
Fluoride	2.00	1.82	91	2.00	1.88	94	3.2	80-120	<20	
Nitrate as Nitrogen	2.00	1.86	93	2.00	1.86	93	<1	80-120	<20	
Nitrite as Nitrogen	2.00	1.84	92	2.00	1.90	95	3.2	80-120	<20	
Phosphate	2.00	2.02	101	2.00	2.06	103	2.0	80-120	<20	
Sulfate	20.00	18.40	92	20.00	18.60	93	1.1	80-120	<20	

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The Source Group, Inc.
299 West Hillcrest Drive
Suite #220
Thousand Oaks, CA 91360

Site

2980 San Fernando Blvd
Burbank, CA 91504

Telephone: (805)373-9063
Attn: Dan Grasmick

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 314.0, Perchlorate by IC

QUALITY CONTROL REPORT

QC Batch No: 092606 Sample Spiked: 39080.01 QC Prepared: 09/26/2006 QC Analyzed: 09/26/2006

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Perchlorate	0.00	50.00	52.50	105	50.00	52.50	105	<1	80-120	<20

QC Batch No: 092606 Sample Spiked: 39080.01 QC Prepared: 09/26/2006 QC Analyzed: 09/26/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit						
Perchlorate	50.00	52.00	104	85-115						

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 376.2, Total Sulfide, Colorimetric (EPA/600/4-79-020)

QUALITY CONTROL REPORT

QC Batch No: 092606 Sample Spiked: 39080.01 QC Prepared: 09/26/2006 QC Analyzed: 09/26/2006

Analytes	SM Result	SM DUP Result	RPD %	SM RPD % Limit						
Sulfide, total	ND	ND	<1	<15						

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 6010/7000CAM, CAM Title 22 Metals (SW-846)

QUALITY CONTROL REPORT

QC Batch No: 092906-1 Sample Spiked: 39108.01 QC Prepared: 09/29/2006 QC Analyzed: 09/29/2006

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Antimony	ND	1.00	0.84	84	1.00	0.82	82	2.4	80-120	<15
Arsenic	ND	1.00	0.88	88	1.00	0.86	86	2.3	80-120	<15
Barium	0.002	1.00	0.91	91	1.00	0.88	88	3.4	80-120	<15
Beryllium	ND	1.00	0.89	89	1.00	0.87	87	2.3	80-120	<15
Cadmium	0.001	1.00	0.89	89	1.00	0.86	86	3.4	80-120	<15
Chromium	0.001	1.00	0.89	89	1.00	0.85	85	4.6	80-120	<15
Cobalt	ND	1.00	0.89	89	1.00	0.86	86	3.4	80-120	<15
Copper	0.002	1.00	0.87	87	1.00	0.84	84	3.5	80-120	<15
Lead	ND	1.00	0.88	88	1.00	0.85	85	3.5	80-120	<15
Mercury (By EPA 7470)	ND	0.01	0.01	91	0.01	0.01	98	7.4	80-120	<15
Molybdenum	0.008	1.00	0.91	90	1.00	0.89	88	2.2	80-120	<15
Nickel	0.003	1.00	0.88	88	1.00	0.85	85	3.5	80-120	<15
Selenium	ND	1.00	0.90	90	1.00	0.88	88	2.2	80-120	<15
Silver	ND	1.00	0.81	81	1.00	0.82	82	1.2	80-120	<15
Thallium	0.001	1.00	0.91	91	1.00	0.86	86	5.6	80-120	<15
Vanadium	ND	1.00	0.89	89	1.00	0.85	85	4.6	80-120	<15
Zinc	0.074	1.00	1.00	93	1.00	0.96	89	4.4	80-120	<15

QC Batch No: 092906-1 Sample Spiked: 39108.01 QC Prepared: 09/29/2006 QC Analyzed: 09/29/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit						
Antimony	1.00	0.83	83	80-120						
Arsenic	1.00	0.89	89	80-120						
Barium	1.00	0.92	92	80-120						
Beryllium	1.00	0.89	89	80-120						
Cadmium	1.00	0.90	90	80-120						
Chromium	1.00	0.88	88	80-120						
Cobalt	1.00	0.89	89	80-120						
Copper	1.00	0.85	85	80-120						
Lead	1.00	0.87	87	80-120						
Mercury (By EPA 7470)	0.01	0.01	103	80-120						
Molybdenum	1.00	0.90	90	80-120						
Nickel	1.00	0.89	89	80-120						
Selenium	1.00	0.89	89	80-120						

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 6010/7000CAM, CAM Title 22 Metals (SW-846)

QC Batch No: 092906-1 Sample Spiked: 39108.01 QC Prepared: 09/29/2006 QC Analyzed: 09/29/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit						
Silver	1.00	0.86	86	80-120						
Thallium	1.00	0.89	89	80-120						
Vanadium	1.00	0.88	88	80-120						
Zinc	1.00	0.92	92	80-120						

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 6010BSCAN, Ca, Fe, Mg, Mn, K, and Na by ICP

QUALITY CONTROL REPORT

QC Batch No: 092906-1 Sample Spiked: 39108.01 QC Prepared: 09/29/2006 QC Analyzed: 09/29/2006

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Calcium	0.291	1.00	1.20	91	1.00	1.22	93	2.2	80-120	<15
Iron	0.069	1.00	0.98	91	1.00	0.99	92	1.1	80-120	<15
Magnesium	0.030	1.00	0.95	92	1.00	0.98	95	3.2	80-120	<15
Manganese	0.014	1.00	0.91	90	1.00	0.87	86	4.5	80-120	<15
Potassium	0.604	1.00	1.48	88	1.00	1.44	84	4.7	80-120	<15
Sodium	1.776	1.00	2.62	84	1.00	2.62	84	<1	80-120	<15

QC Batch No: 092906-1 Sample Spiked: 39108.01 QC Prepared: 09/29/2006 QC Analyzed: 09/29/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit						
Calcium	1.00	0.98	98	80-120						
Iron	1.00	0.95	95	80-120						
Magnesium	1.00	0.97	97	80-120						
Manganese	1.00	0.89	89	80-120						
Potassium	1.00	0.90	90	80-120						
Sodium	1.00	0.86	86	80-120						

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AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 7199, Chromium Hexavalent by Ion Chromatography

QUALITY CONTROL REPORT

QC Batch No: 092606 Sample Spiked: 39080.01 QC Prepared: 09/26/2006 QC Analyzed: 09/26/2006

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Chromium (VI)	49.9	50.00	94.90	90	50.00	94.90	90	<1	85-115	<20

QC Batch No: 092606 Sample Spiked: 39080.01 QC Prepared: 09/26/2006 QC Analyzed: 09/26/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit						
Chromium (VI)	50.00	50.00	100	80-120						

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QUALITY CONTROL REPORT

QC Batch No: 100206 Sample Spiked: 100206 QC Prepared: 10/02/2006 QC Analyzed: 10/02/2006

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Benzene	0.00	50.00	49.50	99	50.00	50.00	100	1.0	75-125	<20
Chlorobenzene	0.00	50.00	51.50	103	50.00	51.00	102	<1	75-125	<20
1,1-Dichloroethene	0.00	50.00	52.00	104	50.00	49.50	99	4.9	75-125	<20
Methyl-tert-butyl ether (MTBE)	0.00	50.00	45.50	91	50.00	41.50	83	9.2	75-125	<20
Toluene (Methyl benzene)	0.00	50.00	50.50	101	50.00	50.50	101	<1	75-125	<20
Trichloroethene	0.00	50.00	55.00	110	50.00	53.00	106	3.7	75-125	<20

QC Batch No: 100206 Sample Spiked: 100206 QC Prepared: 10/02/2006 QC Analyzed: 10/02/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit						
Benzene	50.00	51.50	103	75-125						
Chlorobenzene	50.00	50.00	100	75-125						
1,1-Dichloroethene	50.00	57.50	115	75-125						
Methyl-tert-butyl ether (MTBE)	50.00	52.50	105	75-125						
Toluene (Methyl benzene)	50.00	50.00	100	75-125						
Trichloroethene	50.00	57.00	114	75-125						
LCS										
Chloroform (Trichloromethane)	50.00	51.00	102	75-125						
Ethylbenzene	50.00	51.00	102	75-125						
1,1,1-Trichloroethane	50.00	53.50	107	75-125						
o-Xylene	50.00	49.00	98	75-125						
m,p-Xylenes	100.00	99.00	99	75-125						

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Thousand Oaks, CA 91360

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 8260B-SIM, 1,2,3-TCP and 1,4-Dioxane by GC/MS SIM (8260B Modified)

QUALITY CONTROL REPORT

QC Batch No: 100406 Sample Spiked: 100406 QC Prepared: 10/04/2006 QC Analyzed: 10/04/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
1,4-Dioxane	25.00	26.50	106	25.00	24.25	97	8.9	60-130	<30	
1,2,3-Trichloropropane	0.13	0.12	96	0.13	0.11	88	8.7	60-130	<30	

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Thousand Oaks, CA 91360

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Project ID: 060111DC1

AETL Job Number	Submitted	Client
39080	09/25/2006	SOURCE

Method: 1625M, N-Nitrosodimethylamine by Isotope Dilution and CI Mode GC/MS

QUALITY CONTROL REPORT

QC Batch No: 100206 Sample Spiked: 100206 QC Prepared: 10/02/2006 QC Analyzed: 10/03/2006

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
N-Nitrosodimethylamine	.0.00	20.00	19.60	98	20.00	18.20	91	7.4	70-130	<30

QC Batch No: 100206 Sample Spiked: 100206 QC Prepared: 10/02/2006 QC Analyzed: 10/03/2006

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit						
N-Nitrosodimethylamine	10.00	10.10	101	70-130						

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Data Qualifiers and Descriptors

Data Qualifier:

*:	In the QC section, sample results have been taken directly from the ICP reading. No preparation factor has been applied.
B:	Analyte was present in the Method Blank.
D:	Result is from a diluted analysis.
E:	Result is beyond calibration limits and is estimated.
H:	Analysis was performed over the allowed holding time due to circumstances which were beyond laboratory control.
J:	Analyte was detected , However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).
M:	Matrix spike recovery is outside control limits due to matrix interference. Laboratory Control Sample recovery was acceptable.
S6:	Surrogate recovery is outside control limits due to matrix interference.
S8:	The analysis of the sample required a dilution such that the surrogate concentration was diluted below the method acceptance criteria.
X:	Results represent LCS and LCSD data.

Definition:

%Limi:	Percent acceptable limits.
%REC:	Percent recovery.
Con.L:	Acceptable Control Limits
Conc:	Added concentration to the sample.
LCS:	Laboratory Control Sample
MDL:	Method Detection Limit is a statistically derived number which is specific for each instrument, each method, and each compound. It indicates a distinctively detectable quantity with 99% probability.
MS:	Matrix Spike
MS DU:	Matrix Spike Duplicate.

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Data Qualifiers and Descriptors

ND:	Analyte was not detected in the sample at or above MDL.
PQL:	Practical Quantitation Limit or ML (Minimum Level as per RWQCB) is the minimum concentration that can be quantified with more than 99% confidence. Taking into account all aspects of the entire analytical instrumentation and practice.
Recov:	Recovered concentration in the sample.
RPD:	Relative Percent Difference

APPENDIX C

Historical Data Tables

Table C-1

Historic Groundwater Elevations

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Well Identification	Measurement Date	Top of Casing Elevation (feet msl)[1,2]	Depth to Groundwater (ft below TOC)[3]	Groundwater Elevation (feet msl)
W-1	1/11/2006	688.79	222.02	466.77
W-1	4/27/2006	688.59	218.54	470.05
W-1	7/6/2006	688.59	217.14	471.45
W-1	9/25/2006	688.59	217.17	471.42
W-2	1/11/2006	693.76	224.27	469.49
W-2	4/27/2006	693.76	221.03	472.73
W-2	7/6/2006	693.76	219.02	474.74
W-2	9/25/2006	693.76	218.7	475.06
W-3	1/11/2006	694.29	229.87	464.42
W-3	4/27/2006	692.70	224.21	468.49
W-3	7/6/2006	692.70	222.57	470.13
W-3	9/25/2006	692.70	222.46	470.24

Notes:

1. msl - mean seal level.
2. Well survey data for W-2 measured January 11, 2006. Wells W-1 and W-3 re-measured April 6, 2006 after well casing modifications.
3. TOC - top of casing.

Table C-2

Historic Groundwater Analytical Results
Volatile Organic Compounds (VOCs) using EPA Method 8260B

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte[1,2]								
		Carbon Tetrachloride	Chloroform	1,1-Dichloroethane (11-DCA)	1,2-Dichloroethane (12-DCA)	1,1-Dichloroethene (11-DCE)	cis-1,2-Dichloroethene (cis-12-DCE)	Tetrachloroethene (PCE)	1,1,1-Trichloroethane (111-TCA)	Trichloroethene (TCE)
W-1	1/11/2006	9.4	2.7	<1.0[3]	<1.0	69.9	<1.0	212	<1.0	730
W-1	4/27/2006	9.5	2.9	<1.0	<1.0	48.3	<1.0	205	<1.0	557
W-1	7/6/2006	7.8	2.1	<1.0	<1.0	31.6	1.1	298	<1.0	448
W-1	9/25/2006	7.9	2.3	<1.0	<1.0	36.3	0.6 J[4]	191	<1.0	372
W-2	1/11/2006	7.1	14.2	7.4	<1.0	252	20.6	70.9	1.1	1,800
W-2	4/27/2006	7.6	17.5	10.2	<1.0	246	21.8	234	1.3	1,840
W-2	7/6/2006	5.9	12.9	10	<1.0	203	21.7	142	1.1	1,330
W-2	9/25/2006	5.5	12.1	9.2	<1.0	146	20.3	120	0.8 J	1,870
W-3	1/11/2006	14.1	19.6	7	<1.0	212	20.5	423	<1.0	3,220
W-3	4/27/2006	15.0	24	9.2	<1.0	244	23	557	3.8	3,680
W-3	7/6/2006	11.4	16.5	7.9	0.7 J	198	21.6	765	5.1	2,380
W-3	9/25/2006	12.0	16.4	7.4	<1.0	159	20.8	785	3.6	2,990
QCTB-1	1/11/2006	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
QCTB-1	4/27/2006	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
QCTB-1	7/6/2006	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
QCTB-1	9/25/2006	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0

Notes:

1. All concentrations in micrograms per liter (ug/L).
2. Only detected VOCs are listed in table. For a complete list of VOCs screened for by EPA Method 8260B, please refer to the laboratory summary report (Appendix B).
3. < - denotes analyte not detected above the noted practical quantitation limit.
4. J - denotes analyte was detected between Method Detection Limit (MDL) and Practical Quantitation Limit (PQL), and the concentratio

Table C-3

Historic Groundwater Analytical Results
Emergent Chemicals of Concern

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte[1]				
		Hexavalent Chromium (Cr VI)	Perchlorate (ClO_4^-)	1,2,3-Trichloropropane (123-TCP)	1,4-Dioxane	n-Nitrosodimethylamine (NDMA)
		Analytical Method				
		7199	314.0	5030 / 8260B-SIM	5030 / 8260B-SIM	1625M
		Reported Units				
		ug/liter	ug/liter	ug/liter	ug/liter	ng/liter
W-1	1/11/2006	5.5	<2[2]	<0.005	<2	<2
W-1	4/27/2006	12.0	<2	<0.005	<2	<2
W-1	7/6/2006	9.56	<2	<0.005	<2	<2
W-1	9/25/2006	7.86	<2	<0.005	<2	<2
W-2	1/11/2006	6.4	<2	<0.005	<2	<2
W-2	4/27/2006	13.1	2.08	<0.005	<2	<2
W-2	7/6/2006	9.66	2.26	<0.005	<2	<2
W-2	9/25/2006	8.14	<2	<0.005	<2	<2
W-3	1/11/2006	8.7	<2	<0.005	<2	2
W-3	4/27/2006	35.1	<2	<0.005	3.25	<2
W-3	7/6/2006	51.1	<2	<0.005	<2	<2
W-3	9/25/2006	31.1	<2	<0.005	<2	<2

Notes:

1. Concentration units noted by analyte.
2. < - denotes analyte not detected above the noted practical quantitation limit.

Table C-4

Historic Groundwater Analytical Results
CAM 17 Metals Using EPA Method 6010/7000 Series

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte and Analytical Test Method[1]																
		EPA Method 6010																EPA Method 7470
		Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc	Mercury
W-1	1/11/2006	<0.1[2]	<0.1	0.113	<0.05	<0.05	<0.05	<0.05	0.018 J[3]	<0.1	0.01 J	<0.05	<0.1	<0.05	<0.1	<0.05	0.016 J	<0.002
W-1	4/27/2006	<0.1	<0.1	0.097	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	0.022 J	<0.002
W-1	7/6/2006	<0.052	<0.1	0.111	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	0.010 J	<0.05	<0.1	<0.05	<0.1	<0.05	<0.05	<0.002
W-1	9/25/2006	<0.1	<0.1	0.083	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	0.032 J	<0.002
W-2	1/11/2006	<0.1	<0.1	0.088	<0.05	<0.05	0.010 J	<0.05	0.020 J	<0.1	0.018 J	<0.05	<0.1	<0.05	<0.1	<0.05	0.014 J	<0.002
W-2	4/27/2006	<0.1	<0.1	0.079	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	<0.05	0.018 J	<0.1	<0.05	<0.1	<0.05	<0.05	<0.002
W-2	7/6/2006	<0.1	<0.1	0.093	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	0.011 J	<0.05	<0.1	<0.05	<0.1	<0.05	<0.05	<0.002
W-2	9/26/2006	<0.1	<0.1	0.096	<0.05	<0.05	<0.05	<0.05	<0.05	<0.1	0.010 J	<0.05	<0.1	<0.05	<0.1	<0.05	0.033 J	<0.002
W-3	1/11/2006	<0.1	<0.1	0.077	<0.05	<0.05	0.013 J	<0.05	0.014 J	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	0.015 J	<0.002
W-3	4/27/2006	<0.1	<0.1	0.073	<0.05	<0.05	0.020 J	<0.05	<0.05	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	<0.05	<0.002
W-3	7/6/2006	<0.1	<0.1	0.086	<0.05	<0.05	0.056	<0.05	<0.05	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	<0.05	<0.002
W-3	9/26/2006	<0.1	<0.1	0.089	<0.05	<0.05	0.027 J	<0.05	<0.05	<0.1	<0.05	<0.05	<0.1	<0.05	<0.1	<0.05	0.029 J	<0.002

Notes:

1. All concentrations in milligrams per liter (mg/L).
2. < - denotes analyte not detected above the noted practical quantitation limit.
3. J - denotes analyte was detected between Method Detection Limit (MDL) and Practical Quantitation Limit (PQL), and the concentration is estimated.

Table C-5

Historic Groundwater Analytical Results
General Minerals - Cations; Using EPA Method 6010

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Analyte[1]					
		Calcium	Iron	Magnesium	Manganese	Potassium	Sodium
W-1	1/11/2006	96.5	<0.1 [2]	30.7	<0.1	4.21	38.5
W-1	4/27/2006	83.5	<0.1	26.7	<0.1	3.70	36.0
W-1	7/6/2006	95.4	<0.1	30.2	<0.1	4.23	37.8
W-1	9/25/2006	83.2	<0.1	26.7	<0.1	3.74	27.6
W-2	1/11/2006	77.7	<0.1	23.6	<0.1	3.77	47.1
W-2	4/27/2006	70.0	<0.1	21.3	<0.1	8.56	43.2
W-2	7/6/2006	82.6	<0.1	24.8	<0.1	3.90	46.8
W-2	9/25/2006	88.3	<0.1	27.4	<0.1	4.71	41.3
W-3	1/11/2006	70.5	<0.1	21.9	<0.1	3.47	36.9
W-3	4/27/2006	64.9	<0.1	20.2	<0.1	8.16	35.2
W-3	7/6/2006	3.89	<0.1	24.5	<0.1	3.89	40.2
W-3	9/25/2006	70.1	<0.1	21.9	<0.1	3.76	29.9

Notes:

1. All concentrations in milligrams per liter (mg/L).
2. < - denotes analyte not detected above the noted practical quantitation limit.

Table C-6

Historic Groundwater Analytical Results
General Minerals - Anions, Dissolved Oxygen, and Total Dissolved Solids

Former SSP Site
2980 North San Fernando Boulevard, Burbank California

Sample Identification	Sample Date	Chloride	Fluoride	Nitrate as N	Nitrite as N	Sulfate	Sulfide	Phosphate	Total Dissolved Solids	Dissolved Oxygen
		Analytical Method								
		300.0	300.0	300.0	300.0	300.0	376.2	300.0	160.1	SM-4500-OG
		Reported Concentration Units								
		mg/liter	mg/liter	mg/liter	mg/liter	mg/liter	mg/liter	mg/liter	mg/liter	mg/liter
W-1	1/11/2006	51.2	--[1]	10.6	<0.04[2]	103	<0.05	--	--	8
W-1	4/27/2006	53.3	--	10.4	<0.04	104	<0.05	--	--	7.59
W-1	7/6/2006	55.1	<0.10	9.35	<0.2	105	<0.05	<0.03	560	--
W-1	9/25/2006	52.7	0.15	9.25	<0.2	98	<0.05	<0.03	566	--
W-2	1/11/2006	42.6	--	9.6	<0.04	99	<0.05	--	--	7.77
W-2	4/27/2006	44.0	--	9.8	<0.04	102	<0.05	--	--	7.64
W-2	7/6/2006	48.2	<0.1	9.5	<0.2	107	<0.05	<0.03	570	--
W-2	9/25/2006	47.1	0.1	9.6	<0.2	106	<0.05	<0.03	548	--
W-3	1/11/2006	33.3	--	9.75	<0.04	66.7	<0.05	--	--	7.55
W-3	4/27/2006	36.3	--	9.7	<0.04	66.8	<0.05	--	--	7.57
W-3	7/6/2006	36.4	<0.1	9.75	<0.2	68.5	<0.05	<0.03	492	--
W-3	9/25/2006	35.8	0.2	9.4	<0.2	62.2	<0.05	<0.03	468	--

Notes:

1. -- - denotes sample was not analyzed for parameter during sampling event.
2. < - denotes analyte not detected above the noted practical quantitation limit.

EXHIBIT C

California Water Boards

Edmund G. Brown Jr.
Governor

Matthew Rodriquez
Secretary for Environmental Protection

Los Angeles Regional Water Quality Control Board

June 20, 2013

Mr. Jim Sasselli
Senior Aerospace SSP
2980 North San Fernando Boulevard
Burbank, California 91504

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 2970 0000 0645 3199

SUBJECT: **REVISED REQUIREMENT FOR TECHNICAL REPORT PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2012-0069-A01**

SITE: **STAINLESS STEEL PRODUCTS/INDUSTRIES, 2980 SAN FERNANDO BOULEVARD, BURBANK, CALIFORNIA (FILE NO. 104.1005)**

Dear Mr. Sasselli:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of the Los Angeles and Ventura Counties, including the referenced site.

The Regional Board is investigating potential sources for groundwater pollution within the United States Environmental Protection Agency (USEPA) San Fernando Valley Superfund Site (Superfund Site). It is known that groundwater within the Superfund Site, including the vicinity of the Stainless Steel Products/Industries facility, is contaminated with volatile organic compounds (VOCs) and heavy metals, particularly chromium.

Regional Board staff has reviewed technical information and historical documents contained in Regional Board files for the property located at 2980 North San Fernando Boulevard, in the City Burbank, California (the Site). Stainless Steel Products/Industries has occupied the Site since approximately 1952. Stainless Steel Products/Industries' operations at the Site included the use of hexavalent chromium, sodium dichromate and chromic acid in processes such as metal etching and metal finishing. Previous investigations were conducted at the Site, which focused on VOCs and not heavy metals. Therefore, the potential discharge and/or release of chromium based compounds to the soils at the Site, as a result of the past Stainless Steel Products/Industries operations, has not been determined.

Enclosed is a Regional Board revised order for technical report requirements pursuant to California Water Code Section 13267 Order No. R4-2012-0069-A01 (Order). The Order was previously issued to Breeze-Eastern Corporation, Mr. William Zimmerman, and Mr. James Galbraith. The previously issued Order overlooked Senior Aerospace SSP, the current Site operator. Therefore, the attached Order has been revised to include Senior Aerospace SSP and to provide you with additional time to comply with

the Order to prepare and submit a Subsurface Soil Investigation Workplan in order to evaluate the subsurface conditions and the potential for groundwater contamination.

The above addition to the responsible parties for the Site constitutes an amendment to the California Water Code section 13267 Order originally dated September 21, 2012. All other aspects of the Order originally dated September 21, 2012, and amendments thereto, remain in full force and effect. The required technical report is necessary to investigate the characteristics of and extent of the discharges of waste at the Site and to evaluate cleanup alternatives. Therefore, the burden, including costs, of the report bears a reasonable relationship to the need for the reports and benefits to be obtained. Pursuant to section 13268 of the California Water Code, failure to submit the required technical report by the specified due date may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars ($1000) for each day each technical report is not received.

Should you have any questions related to this project, please contact Ms. Luz Rabelo via telephone at (213) 576-6783 or via email at luz.rabelo@waterboards.ca.gov.

Sincerely,

for Paula Rasmussen

Samuel Unger, P.E.
Executive Officer

Enclosure: Revised California Water Code Section 13267 Order No. R4-2012-0069-A01
Original California Water Code Section 13267 Order No. R4-2012-0069 issued on September 21, 2012

cc: Ms. Lisa Hanusiak, USEPA Region IX
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. Milad Taghavi, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster
Ms. Sonja Donaldson, c/o Breeze-Eastern Corporation
Mr. William R. Zimmerman, Stainless Steel Products
Mr. James Galbraith, Stainless Steel Products
Mr. Craig Bloomgarden, Manatt, Phelps & Phillips, LLP

REVISED ORDER TO PROVIDE A TECHNICAL REPORT FOR
SUBSURFACE SOIL INVESTIGATION
CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2012-0069-A01

DIRECTED TO BREEZE-EASTERN CORPORATION, MR. WILLIAM ZIMMERMAN,
MR. JAMES GALBRAITH AND SENIOR AEROSPACE SSP

STAINLESS STEEL PRODUCTS/INDUSTRIES
2980 NORTH SAN FERNANDO BOULEVARD, BURBANK, CALIFORNIA
(FILE NO. 104.1005)

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267, which authorizes the Regional Board to require the submittal of technical and monitoring reports.

1. The groundwater within the San Fernando Valley Groundwater Basin (Basin) has been impacted by discharges of heavy metals, specifically chromium. The San Fernando Valley Superfund Site (Superfund Site) lies within the Basin. The United States Environmental Protection Agency (USEPA) and the Regional Board are investigating the potential sources of the discharges to the Basin. The agencies are currently focused on identifying individuals and companies responsible for the discharges of chromium in the Basin and holding them responsible for the investigation and remediation of the source sites. The property located at 2980 North San Fernando Boulevard, in the City of Burbank, California (the Site) is a potential source of chromium and overlies the Basin.

2. The Site was developed and occupied by Stainless Steel Products/Industries since approximately 1952. The Site is currently owned by First Industrial Real Estate, Inc. of Chicago, Illinois, who reported that Mr. William Zimmerman and Mr. James Galbraith were the first owners/operators of Stainless Steel Products/Industries at the Site. The Site is currently occupied by Senior Aerospace SSP. Senior Aerospace SSP is a subsidiary of Breeze –Eastern Corporation and a successor to Stainless Steel Products/Industries. Stainless Steel Products/Industries' operations at the Site included the use of hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and metal finishing processes were part of the on-site operations conducted by Stainless Steel Products/Industries. In 1987, the USEPA and the Regional Board initiated an investigation at the Site which focused on volatile organic compounds (VOCs) and not on heavy metals. Therefore, the potential discharge and /or release of chromium based compounds to the soils at the Site, as a result of the past metal finishing operations, has not yet been determined.

3. CWC section 13267(b)(1) states:

> "In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or,

discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports."

4. The Regional Board has obtained evidence indicating that there is a potential for discharge of waste at or from the Site. Regional Board files indicate that operations at the Site consisted of metal coating and metal finishing processes which included the use of hexavalent chromium, sodium dichromate, and chromic acid. Stainless Steel Products/Industries is among the suspected sources of waste discharge in the USEPA Superfund Site because of the chemicals used and the operations conducted at the Site. It is known that groundwater within the Superfund Site, including the vicinity of the Stainless Steel Products/Industries facility, is polluted with VOCs and heavy metals, particularly chromium. To date, a complete subsurface investigation of heavy metals in soil or groundwater has not been performed at the Site.

5. This Order identifies Breeze-Eastern Corporation, Mr. William Zimmerman, Mr. James Galbraith and Senior Aerospace SSP as the entities responsible for the suspected discharges of waste identified in paragraph two (2) and four (4) because Mr. William Zimmerman and Mr. James Galbraith were the owners/operators of the facility where the activities occurred that resulted in the suspected discharges of waste were performed and Senior Aerospace SSP is a subsidiary of Breeze-Eastern Corporation and successor to Stainless Steel Products/Industries.

6. This Order requires the persons/entities named herein to prepare and submit a Subsurface Soil Investigation Workplan (Workplan) in order to evaluate the conditions at the Site and determine if any discharges of heavy metal compounds, specifically chromium, has impacted the soils beneath the Site that could consequently pose a threat to groundwater. You are expected to submit a complete Workplan, as required by this Order, to the Regional Board. The Regional Board may reject the Workplan if it is deemed incomplete and/or require revisions to the Workplan under this Order.

7. The Regional Board needs this information in order to determine whether the Site is a source of discharges of waste, specifically chromium, and to determine whether the subsurface soil conditions at the Site are causing or threatening to cause discharges of waste to the waters of the State within the Basin.

8. The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to identify sources of discharges of waste to the Basin and to assure adequate cleanup of the Stainless Steel Products/Industries facility, which as described above potentially poses significant threats to public health and the environment.

9. The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to

section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plan are not yet known. It is unlikely that implementation of the work associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.

10. Any person aggrieved by this action of the Regional Board may petition the State Water Resources Control Board (State Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at the following link:

    http://www.waterboards.ca.gov/public_notices/petitions/water_quality

    or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Breeze-Eastern Corporation, Mr. William Zimmerman, Mr. James Galbraith and Senior Aerospace SSP, pursuant to section 13267(b) of the CWC, are required to:

1. Submit a Subsurface Soil Investigation Workplan (Workplan) to the Regional Board by **August 2, 2013**. Guidance documents to assist you with this task can be found on the Internet at the following links:

    "General Work Plan Requirements for a Heavy Metal Soil Investigation"
    http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/General_Workplan_Requirements_for_a_Heavy_Metals_Soil_Investigation.pdf

    "*Interim Site Assessment & Cleanup Guidebook (May1996),*"
    http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/may1996_voc_guidance.shtml

    "Quality Assurance Project Plan"
    http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/Board_SGV-SFVCleanupProgram_Sept2008_QAPP.pdf

2. The Workplan shall include detailed information of former and existing chromium storage, hazardous waste management, and associated practices.

3. The Workplan must also include proposed soil sampling boring locations which shall extend to a minimum depth of 25 feet below ground surface in the areas of the previous plating processes and waste treatment (sumps, clarifiers, etc.), hazardous waste storage area, and chemical storage area.

4. The Workplan must contain a health and safety plan (HASP), as per the guidelines.

5. The Workplan shall include a detailed schedule of implementation of the Workplan, including field work and providing a report of the results to the Regional Board.

6. Upon approval, the Workplan shall be implemented and a report summarizing the results according to the approved schedule must be submitted to the Regional Board.

The above item shall be submitted to:

Ms. Luz Rabelo
Water Resources Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013
Phone: (213) 576-6783
Email: luz.rabelo@waterboards.ca.gov

Pursuant to 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required Workplan described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars ($1,000) per day for each day the Workplan is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The Regional Board, under the authority given by the CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by Mr. William Zimmerman and Mr. James Galbraith and a senior authorized Breeze-Eastern Corporation and Senior Aerospace SSP representative (not by a consultant). The perjury statement shall be in the following format:

> "I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The State Board adopted regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, California Code of Regulation) requiring the electronic submittal of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found on the Internet at the following link:

http://www.waterboards.ca.gov/ust/electronic_submittal.

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Regional Board letters and orders issued to you or for the Site. However, the Regional Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker.

SO ORDERED.

for Paula Rasmussen
Samuel Unger, P.E.
Executive Officer

6-20-2013
Date

CALIFORNIA
Water Boards

Los Angeles Regional Water Quality Control Board

September 21, 2012

Ms. Sonja Donaldson
Acting Director of Environmental Affairs
Breeze-Eastern Corporation
35 Melanie Lane
Whippany, NJ 07981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1251

Mr. William R. Zimmerman
Owner /Operator
Stainless Steel Products
790 Huntington Circle
Pasadena, California 91106-4510

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1350

Mr. James Galbraith
Owner /Operator
Stainless Steel Products
2600 Mission Street, Suite 200
San Marino, CA 91108

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 3500 0003 5491 1367

SUBJECT: **REQUIREMENT FOR TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE (CWC) SECTION 13267 ORDER NO. R4-2012-0069**

SITE: **STAINLESS STEEL PRODUCTS/INDUSTRIES, 2980 SAN FERNANDO BLVD. BURBANK, CALIFORNIA (WIP FILE NO. 104.1002)**

Dear Ms. Donaldson and Messrs. Zimmerman, Galbraith,

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura County, including the above referenced property (Site).

Enclosed is a Regional Board Order for technical report requirements pursuant to the California Water Code (CWC) section 13267 (Order). Operations at the Stainless Steel Products/Industries facility included the use of hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and finishing processes were part of the on-site operations. The soil investigation that was conducted in 1987 focused on VOCs and not heavy metals. The potential discharge and/or release of chromium based compounds to the soils at the Site, as a result of the past metal finishing operations, has not been determined.

Based on the review of the Regional Board file information, we have determined that the past use of chromic acid in your plating operations may have contributed to contamination or the regional groundwater. Therefore, as the responsible parties, you are required to comply with the Order and prepare a subsurface soil investigation workplan (Workplan) for the facility.

The State Water Resources Control Board (State Water Board) adopted regulations requiring the electronic submittals of information over the Internet using the State Water Board GeoTracker database. You are required not only to submit an electronic copy of the reports (in PDF format) required in this Order but also to electronically upload all reports and correspondence prepared to-date and additional required data to the GeoTracker system. Information about GeoTracker submittals, including links to text of the governing regulations, can be found on the Internet at the following link:

http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal

Should you have any questions related to this project, please contact Mr. Larry Moore at (213) 576-6730 or at lmoore@waterboards.ca.gov.

Sincerely,

for Paula Rasmussen

Samuel Unger, P.E.
Executive Officer

Attachment: California Water Code Section 13267 Order No. R4-2012-0069

cc: Ms. Lisa Hanusiak, USEPA Region IX
Mr. Leo Chan, City of Glendale
Mr. Bill Mace, City of Burbank Water Supply Department
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power
Mr. David Pettijohn, Los Angeles Department of Water & Power
Mr. Richard Slade, ULARA Watermaster
Mr. Michael Reese, First Industrial Real Estate

ORDER TO PROVIDE A TECHNICAL REPORT FOR SUBSURFACE SOIL INVESTIGATION CALIFORNIA WATER CODE SECTION 13267 ORDER NO. R4-2012-0069

DIRECTED TO STAINLESS STEEL PRODUCTS/INDUSTRIES AND BREEZE EASTERN CORPORATION

STAINLESS STEEL PRODUCTS/INDUSTRIES 2980 SAN FERNANDO BLVD., BURBANK, CALIFORNIA (WIP FILE NO. 104.1002)

The Los Angeles Regional Water Quality Control Board (Regional Board) makes the following findings and issues this Order pursuant to California Water Code (CWC) section 13267.

1. The groundwater within the San Fernando Valley Groundwater Basin has been impacted by heavy metals, specifically chromium. As a result of the groundwater impacts, we are investigating potential sources of the contamination. The current investigation, led by US Environmental Protection Agency (USEPA) and the Regional Board, is focused on identifying individuals and companies responsible for the chromium contamination in the region and holding them responsible for the investigation and remediation of the affected site. The above Site is located in the investigative area, and therefore, you are required to comply with this order.

2. The site (Site), located at 2980 San Fernando Boulevard, Burbank, California, was developed and occupied by Stainless Steel Products/Industries (SSP) since 1952. The property is currently owned by First Industrial Real Estate, Inc. of Chicago, Illinois. The facility is occupied by Senior Aerospace SSP, a subsidiary of Breeze-Eastern Corporation of New Jersey, and a successor to Stainless Steel Products. In 1987, the United States Environmental Protection Agency (USEPA) and the Regional Board initiated an investigation at the Site to determine whether past operations had resulted in a discharge and/or release of volatile organic compounds (VOCs) to the soils. Operations at the Stainless Steel Products/Industries facility included the use of hexavalent chromium, sodium dichromate, and chromic acid. Metal coating and finishing processes were part of the on-site operations. The soil investigation that was conducted in 1987 focused on VOCs and not heavy metals. The potential discharge and/or release of chromium based compounds to the soils at the Site, as a result of the past metal finishing operations, has not been determined.

3. The CWC section 13267(b)(1) states, in part: In conducting an investigation, the Regional board may require that any person who has discharged, discharges, or is suspected of having discharged or, discharging, or who proposes to discharge waste within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the Regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the Regional Board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.

4. The Regional Board file information indicates that past operations consisted of Metal coating and finishing processes. Chemical compounds reportedly used at the site include hexavalent chromium, sodium dichromate, and chromic acid. To date, no subsurface heavy metals soil or groundwater investigation has been performed at the Site

5. The Regional Board file information in support of this requirement is the use of chromium containing compounds in metal finishing and coating processes. The file information indicates that SSP used 450 pounds of chromic acid (Alodine 120) to coat parts and 600 pounds of sodium dichromate to clean parts.

6. This Order identifies Stainless Steel Products and Breeze Eastern Corporation as the responsible parties for the discharges and potential discharges of wastes identified in paragraphs one (1) and two (2), because they were/are owners and operators of the facility directly responsible for the industrial processes involved the use and storage of the wastes at the property.

5. This Order requires the persons/entities named herein to prepare and submit a Work Plan to conduct a subsurface soil investigation to determine if any unauthorized release of heavy metal compounds has impacted the soils beneath the site that could consequently pose a threat to the groundwater.

6. The Regional Board needs this information to determine the subsurface soil conditions at the Site as part of efforts to identify sources of chromium contamination in the San Fernando Valley.

7 The burdens, including costs, of these reports bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The information is necessary to assure adequate cleanup of the SSP property, which as described above potentially poses significant threats to public health and the environment.

8 The issuance of this Order is an enforcement action by a regulatory agency and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to section 15321(a)(2), Chapter 3, Title 14 of the California Code of Regulations. This Order requires submittal of technical and/or monitoring reports and work plans. The proposed activities under the work plans are not yet known. It is unlikely that implementation of the work plans associated with this Order could result in anything more than minor physical changes to the environment. If the implementation may result in significant impacts on the environment, the appropriate lead agency will address the CEQA requirements prior to implementing any work plan.

9 Any person aggrieved by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on

the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

THEREFORE, IT IS HEREBY ORDERED that Stainless Steel Products/Industries and Breeze Eastern Corporation, pursuant to section 13267(b) of the CWC, are required to submit the following:

1. By October 22, , **2012** submit a Work Plan for a subsurface soil investigation. We are providing a guidance document entitled *"General Work Plan Requirements for a Heavy Metal Soil Investigation"* to assist you with this task. This document is provided as Appendix B. Additional information can be found in our guidance manual entitled "*Interim Site Assessment & Cleanup Guidebook (May1996),"* which can be found at the Regional Board web-site at: http://www.waterboards.ca.gov/losangeles/water_issues/programs/remediation/may1996_voc_guidance.shtml.

   In addition, your Work Plan shall be developed following the applicable components of the Regional Board's *"Guidelines for Report Submittals, Section VI. Site Assessment Plans," (March 1991, Revised June 1993).* A copy of the guidelines can be found at the following URLwebsite:
   http://www.waterboards.ca.gov/losangeles/water_issues/programs/ust/guidelines/la_county_guidelines_93.pdf

2. The Work Plan must contain a health and safety plan (H&SP), as per the guidelines.

3. The Work Plan shall include the detailed information of former and existing chromium storage, hazardous waste management, and associated practices;

4. The proposed soil investigation shall extend to a minimum depth of 25 feet below ground surface (bgs) at each investigative area i.e. at the plating process area and waste treatment areas, chemical and waste storage areas, (sumps, clarifiers, etc.).

The above item shall be submitted to Mr. Larry Moore at (213) 576-6730 or at lmoore@waterboards.ca.gov.

Pursuant to 13267(a) of the CWC, any person who fails to submit reports in accordance with the Order is guilty of a misdemeanor. Pursuant to section 13268(b)(1) of the CWC, failure to submit the required technical report described above by the specified due date(s) may result in the imposition of administrative civil liability by the Regional Board in an amount up to one thousand dollars ($1,000) per day for each day the technical report is not received after the above due date. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

The Regional Board, under the authority given by CWC section 13267, subdivision (b)(1), requires you to include a perjury statement in all reports submitted under the 13267 Order. The perjury statement shall be signed by a senior authorized Stainless Steel Products or Breeze Eastern Corporation representative (not by a consultant). The perjury statement shall be in the following format:

> "I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The State Water Board adopted regulations requiring the electronic submittals of information over the internet using the State Water Board GeoTracker data management system. You are required not only to submit electronic copy of the reports (in PDF format) required in this Order, but also to comply by uploading all reports and correspondence prepared to date on to the GeoTracker data management system. The text of the regulations can be found at the URL:

http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/docs/final_electronic_regs_dec04.pdf.

SO ORDERED.

Samuel Unger, P.E.
Executive Officer

9-21-12
Date

EXHIBIT D

415.956.2828 (t)
415.956.6457 (f)

Robert Dollar Building
311 California Street, 10th Flr.
San Francisco CA 94104

202.777.8950 (t)
202.347.8429 (f)

Victor Building
750 9th Street, NW, Suite 710
Washington DC 20001

www.rjo.com

ROGERS JOSEPH O'DONNELL

Robert C. Goodman
rgoodman@rjo.com

October 24, 2014

VIA E-MAIL
jillian.ly@waterboards.ca.gov

Ms. Jillian Ly, P.E.
Water Resources Control Engineer
Remediation Section
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Requirement for Technical Report Pursuant to California Water Code Section 13267 Order No. R4-2014-0176
Site: Stainless Steel Products/Industries, 2980 San Fernando Blvd., Burbank

Dear Ms. Ly:

I represent Senior Aerospace SSP in connection with the above referenced matter, and am writing in response to Samuel Unger's letter dated October 6, 2014, to Mr. Steven Loye of Senior SSP. Mr. Unger's letter enclosed a "Requirement for Technical Report," dated October 6, 2014 ("2014 Order"), pertaining to property located at 2980 North San Fernando Blvd., Burbank, California. Mr. Unger advised that comments concerning the 2014 Order should be directed to you.

The 2014 Order was issued without any prior discussions between the Regional Water Quality Control Board ("RWQCB") and Senior Aerospace SSP concerning its subject matter. As is discussed below, the 2014 Order contains serious factual errors that render it legally defective as to Senior Aerospace SSP. Accordingly, we request that the RWQCB immediately rescind the 2014 Order, as to Senior Aerospace SSP. It should be noted that similar factual errors were asserted in a September 21, 2012, *Order to Provide a Technical Report for Subsurface Soil Investigation California Water Code Section 13267 Order No. R4-2012-0069* ("2012 Order") and June 20, 2013, *Revised Order to Provide a Technical Report for Subsurface Soil Investigation California Water Code Section 13267 Order No. R4-2012-0069-A01* ("Revised 2012 Order"). On July 15, 2013, I sent a letter to the RWQCB alerting it to these factual errors but received no responses. On July 22, 2013,

Senior Aerospace SSP filed a Petition challenging Revised 2012 Order because it was based on erroneous information, and requested that the Petition be held in abeyance.

The 2014 Order addresses the former operations of "Stainless Steel Products/Industries." (2014 Order, Paragraph 2.) The 2014 Order finds that "Senior Aerospace SSP" is a "successor to Stainless Steel Products" and that "Stainless Steel Products (SSP) Industries is a wholly-owned subsidiary of Breeze-Eastern Corporation." (2014 Order, Paragraph 2.) The 2014 Order then identifies "Senior Aerospace SSP" as an entity responsible for the discharges of waste identified in paragraphs 2 and 4 because "SSP Industries, a wholly-owned subsidiary of Breeze-Eastern Corporation was the former entity who operated and Senior Aerospace SSP, a successor to Stainless Steel Products is the current entity who operated the activity that resulted in the potential discharge..." (2014 Order, Paragraph 5.) Both of these justifications for naming Senior Aerospace SSP on the 2014 Order are factually incorrect.

There is no current or historical relationship between Senior Aerospace SSP on the one hand and either SSP Industries or Stainless Steel Products Incorporated on the other. Senior Aerospace SSP is not a subsidiary of Breeze-Eastern Corporation, and has no legal relationship to that entity. Nor is Senior Aerospace SSP a "successor" to "Stainless Steel Products or "Stainless Steel Industries."[1] Rather, Senior Flexonics Inc., a Delaware corporation, purchased the assets of Stainless Steel Products, Inc., a California corporation, on May 10, 1995. Senior Operations LLC, a Delaware Limited Liability Company ("Senior"), is the successor to Senior Flexonics, Inc. Senior Aerospace SSP is an operational division of Senior Operations LLC. Senior Aerospace SSP thus has no liability, as a successor, for any of the actions of Stainless Steel Products, Inc. or Stainless Steel Industries. These errors in the 2014 Order undermine the conclusion set forth in Paragraph 5 of the 2014 Order that Senior Aerospace SSP is an entity responsible for "potential discharge of waste to the subsurface" at the subject property.

Accordingly, we request that the RWQCB immediately rescind the 2014 Order as to Senior Aerospace SSP. If the RWQCB will not do so, Senior Aerospace SSP will have no choice but to file a petition to the State Water Resources Control Board seeking to have the 2014 Order rescinded.

[1] Based on information provided by the U.S. EPA, it is my understanding that the names Stainless Steel Products and Stainless Steel Industries refer to the same entity.

Thank you.

Very truly yours,

Robert C. Goodman /cc

ROBERT C. GOODMAN

cc: Senior Aerospace SSP

PROOF OF SERVICE

I, Clara Chun, state:

My business address is 311 California Street, 10th Floor, San Francisco, CA 94104. I am over the age of eighteen years and not a party to this action. I am employed in the City and County of San Francisco where this service occurred or mailing occurred. On November 4, 2014, I served the following documents described as:

PETITION FOR REVIEW and **DECLARATION OF STEVEN LOYE IN SUPPORT OF PETITION FOR REVIEW**

on the following person(s) in this action by placing a true copy thereof enclosed in a sealed envelope, with the postage prepaid, addressed as follows:

State Water Resources Control Board
Office of the Chief Counsel
Jeannette L. Bashaw, Legal Analyst
P.O. Box 100
Sacramento, CA 95812-0100
jbashaw@waterboards.ca.gov

Samuel Unger, P.E.
Executive Officer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013
sunger@waterboards.ca.gov

Jillian Ly
Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013
Jillian.ly@waterboards.ca.gov

Lisa Hanusiak
US EPA Region 9
Mail Code SFD
75 Hawthorne Street
San Francisco, CA 94105
Tel 415.972.3152
hanusiak.lisa@epamail.epa.gov

Albert G. Gastelum, PE
Director of Water Quality
Los Angeles Department of Water & Power
111 North Hope Street, Room 1368
Los Angeles, CA 90012
Tel 310.367.0780
albert.gastelum@ladwp.com

Jonathan K. Leung, PE
Managing Water Utility Engineer
Los Angeles Department of Water & Power
111 North Hope Street, Room 1217
Los Angeles, CA 90012
jonathan.leung@ladwp.com

Vahe H. Dabbaghian
Los Angeles Department of Water and Power
111 North Hope Street, Room 1217
Los Angeles, CA 90012
vahe.dabbaghian@ladwp.com

Richard C. Slade, PE, CEG
ULARA Watermaster
c/o Richard C. Slade & Associates LLC
12750 Ventura Blvd., Suite 202
Studio City, CA 91604
Tel 818.506.0418
slade@ularawatermaster.com

John A. Simon
Director
Gnarus Advisors LLC
4350 N. Fairfax Drive, Suite 830
Arlington, VA 22203
Tel 202.505.1906
jsimon@gnarusllc.com

VIA U.S. MAIL ONLY

Leo Chan
City of Glendale Water & Power
141 N. Glendale Avenue
Glendale, CA 91206
Tel 818.548.4826

VIA U.S. MAIL ONLY

Bill Mace, P.E.
Assistant General Manager
City of Burbank
Burbank Water & Power
PO Box 631
Burbank, CA 91503-0631
Tel 818.238.3550

X BY FIRST CLASS MAIL: I am readily familiar with my firm's practice for collection and processing of correspondence for mailing with the United States Postal Service, to-wit, that correspondence will be deposited with the United States Postal Service this same day in the ordinary course of business. I sealed said envelope and placed it for collection and mailing on November 4, 2014, following ordinary business practices.

X BY ELECTRONIC SERVICE: I caused the documents to be sent to the person(s) at the electronic notification address(es) listed above. Within a reasonable time, the transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed this date at San Francisco, California.

Dated: November 4, 2014

Clara Chun

Clara Chun

ROGERS JOSEPH O'DONNELL, PC
ROBERT C. GOODMAN (State Bar No. 111554)
ANN M. BLESSING (State Bar No. 172573)
D. KEVIN SHIPP (State Bar No. 245947)
311 California Street
San Francisco, California 94104
Telephone: 415.956.2828
Facsimile: 415.956.6457

Attorneys for Petitioner
Senior Aerospace SSP

STATE WATER RESOURCES CONTROL BOARD

STATE OF CALIFORNIA

In the Matter of SENIOR AEROSPACE SSP, Petitioner Requirement for Technical Report Pursuant to California Water Code Section 13267 Order No. R4-2014-0176 of the Regional Water Quality Control Board, Los Angeles Region	PETITION NO. **DECLARATION OF STEVEN LOYE IN SUPPORT OF PETITION FOR REVIEW**

I, Steven Loye, declare that:

1. I am the Chief Executive Officer of Senior Aerospace SSP, Petitioner in the above-entitled matter. I make this declaration in support of Senior Aerospace SSP's Petition for Review.

2. I have personal knowledge of the facts set forth herein except where stated on information and belief and, if called as a witness, I could and would testify competently hereto. As to facts set forth on information and belief, I believe them to be true.

3. Senior Aerospace SSP is not a subsidiary of Breeze-Eastern Corporation and has no corporate relationship or affiliation with Breeze-Eastern Corporation.

4. Senior Flexonics, Inc. purchased the assets of Stainless Steel Products Inc. in 1995. At the time of that transaction, Zimmerman Holdings, Inc. was the parent

company of Stainless Steel Products Inc. After purchasing the assets they were operated by Senior Aerospace SSP. Senior Aerospace SSP leases the property located at 2980 North San Fernando Boulevard, Burbank, California ("the Site"). Neither Senior Aerospace SSP nor any related company, has ever owned the Site.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge. This declaration was executed in Burbank, California, on November 3, 2014.

STEVEN LOYE