

appropriate length and an electronic data logger or other type of read out unit) and a GMS ground water sample collection kit. The GMS ground water sample collection kit consists of sample vials, ranging in size from 35 to 1000 milliliters (ml), and a sample vial housing assembly. The sample vial(s) are sealed with a flexible viton rubber septum and cap similar to the upper end of the probe. Prior to collecting a ground water sample, the pore pressure unit is connected in series with the sample vial housing via an arrangement of double-ended hypodermic needles. After the housing and pore pressure unit have been connected, the sample vial is evacuated with a hand vacuum pump.

Sampling and pore pressure measurements are obtained by lowering the pressure transducer unit and housing assembly down the drive rod. The tools connect the Enviro Probe via a quick coupling system through the hypodermic needles, which provide a temporary, closed system, hydraulic connection. Ground water samples are obtained directly from the Enviro Probe and into the pre-evacuated sample vials. The pressure transducer is used to monitor filling of the sample vial and to measure hydrostatic pressure of the formation after the sample vial has filled.

If needed, the pore pressure unit or the GMS ground water sampling unit can be used independently. The time allowed to fill the vial depends on the physical properties of the target formation and the ground water pressure at the depth of the probe.

After the sample vial has filled, the sample housing is withdrawn from the drive rods and the sample vial removed. The Enviro Probe is generally purged by removing one probe volume (approximately 15 ml) of ground water prior to collecting a sample for preservation and transport to the laboratory. At locations where multiple sample containers must be filled, the probe can be sampled repeatedly at the same depth by repeating the sample collection procedures.

3.2 HydroPunch Sampling Procedures

HydroPunch I ground water samples are usually collected under hydrostatic conditions, whereby ground water flows from the formation through the screened section and into the sample reservoir. Accordingly, HydroPunch I cannot be used at depths less than approximately 5 feet below the ground water table. The sample reservoir is allowed to fill until ground water enters the drive rod; the water level inside the drive rod can be measured using a water level indicator. The actual sample collection time at each depth depends upon the physical properties of the target zone and the fluid pressure outside the probe. Once the sample reservoir is filled, the HydroPunch is returned to the surface. Although the sample reservoir is sealed at both ends by internal one way check valves, care must be taken to avoid cross-communication with transmissive units or borehole fluids at a higher potentiometric head than the target zone. Before retrieving the tool, deionized water should be added to the drive rod to a level that exceeds the highest potentiometric surface in the borehole.

HydroPunch II can be used below the water table, in a manner similar to HydroPunch I, or it can be used at the water table in the "hydrocarbon mode". If HydroPunch II is used in the "hydrocarbon mode," the sample is collected by lowering a narrow diameter bailer through the drive rod (minimum 1- inch diameter) and bailing out the volume of water

required for analysis. The screen and drive point are left in the hole as the HydroPunch II tool is removed.

When the sample is retrieved to the surface, it is decanted into laboratory prepared sample containers suitable for the analysis desired. The HydroPunch is then disassembled for decontamination and preparation for subsequent sampling depths. The HydroPunch I can be continued in the same borehole to the next desired depth.

3.3 Temporary Well Point Sampling Procedure

After allowing sufficient water from the formation to enter the temporary well (typical times range from 15 minutes to 1 hour), a ground water sample is collected by carefully and slowly lowering a new polyethylene bailer into the temporary well. After removal from the boring, fluid in the bailer will be carefully transferred to the appropriate sampling container. Samples obtained for VOC analysis will be collected to minimize the potential for VOC volatilization (e.g., slowly and carefully lowering the bailer into the temporary well and carefully transferring the water into VOC vials). Once the ground water sample has been collected, the temporary well is removed from the borehole.

Depending on field conditions, temporary well point purging may be conducted. If temporary well purging takes place, then 1 to 3 casing volume will be purged depending on the depth of the well, the depth to water, and the production of the temporary well point.

3.4 Sampling Inside the Hollow Stem Auger Sampling procedure

Using this method, the augers will be advanced to the desired depth, and then retracted a few feet to allow ground water to enter the boring. After allowing sufficient water from the formation to enter the boring (typical times range from 15 minutes to 1 hour), a new polyethylene bailer will be carefully lowered inside the augers and a ground water sample will be collected.

4.0 EQUIPMENT DECONTAMINATION

The Enviro Probe and HydroPunch are cleaned by complete disassembly, including O-rings and/or check valves, followed by a laboratory-grade detergent and potable water wash, followed by a deionized water rinse. All decontamination rinsate will be collected and stored properly for future off-site disposal. The condition of O-rings should be checked during each cleaning and replaced as necessary. The screen should be discarded after each use. The tool will be disassembled after cleaning, following the instructions provided in the appropriate sampling kits. In case of a temporary well, once the PVC is removed from the hole, it will be discarded and new-dedicated PVC will be used on the next borehole.

5.0 EQUIPMENT CONSTRAINTS

The Enviro Probe and its associated GMS assembly require drive rods of a minimum 1-inch inside diameter. HydroPunch I and HydroPunch II ("in the ground water mode") require drive rods of sufficient diameter to allow passage of the water level indicator, generally about ½ inch. HydroPunch II in the "hydrocarbon mode" (water table sampling) requires drive rods of a minimum of 1-1/8-inch diameter to allow passage of the 1-inch-outside-diameter bailer.

As stated earlier, HydroPunch I (and HydroPunch II in the "ground water mode") cannot be used at sampling depths less than 5 feet below the water table. HydroPunch I, when full, has a capacity of 500 ml; HydroPunch II, when full, has a capacity of 1250ml. The Enviro Probe system and HydroPunch II in the "hydrocarbon mode" allow for collection of unlimited sample volumes. The HydroPunch I can be assembled to allow samples to be bailed in a manner similar to hydrocarbon mode so that unlimited sample volume is available.

EXHIBIT H

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7

8 STATE OF CALIFORNIA

9 STATE WATER RESOURCES CONTROL BOARD

11 IN THE MATTER OF THE PETITION OF LEGGETT & PLATT, 12 INCORPORATED, FOR REVIEW OF WATER CODE SECTION 13267 13 ORDER DATED JUNE 11, 2008, BY THE CALIFORNIA REGIONAL 14 WATER QUALITY CONTROL BOARD, LOS ANGELES REGION.	Petition No. PETITION FOR REVIEW PURSUANT TO WATER CODE SECTION 13320 AND 23 C.C.R. SECTION §2050 ET SEQ. [Request To Be Held In Abeyance Under 23 C.C.R. §2050.5(d)] DECLARATION OF GEORGE LINKLETTER IN SUPPORT THEREOF FILED CONCURRENTLY HEREWITH
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18 I. INTRODUCTION

19 Pursuant to Water Code Section 13320 and Title 23 of the California Code of Regulations,
20 Section 2050 et seq., Petitioner Leggett & Platt, Incorporated, a Missouri corporation ("Leggett &
21 Platt") hereby petitions the State Water Resources Control Board ("State Water Board") for
22 review of a Conditional Approval of Work Plan For Additional Investigation Pursuant to
23 California Water Code Section 13267 Order issued on November 25, 2008 ("November 25, 2008
24 Order") by the Executive Officer of the California Regional Water Quality Control Board, Los
25 Angeles Region ("Regional Water Board"), which would require Petitioner to submit an
26 assessment report, including all information specified in the November 25, 2008 Order, relating
27 to soil and groundwater investigation at and about 4900 Valley Boulevard, Los Angeles,
28 California ("Site"). A copy of the November 25, 2008 Order is attached hereto as **Exhibit A.**

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1 **II. A RELATED PETITION HAS BEEN SUBMITTED TO THE STATE WATER**
2 **BOARD AND IS CURRENTLY BEING HELD IN ABEYANCE WHILE**
3 **PETITIONER WORKS WITH THE REGIONAL WATER BOARD IN GOOD**
4 **FAITH**

5 Prior to issuing the November 25, 2008 Order, which is the subject of this Petition, on
6 June 11, 2008, the Regional Water Board issued a Section 13267 Order requiring submittal of a
7 work plan for additional investigation of soil and ground water at and about the Site ("June 11,
8 2008 Order").

9 On July 10, 2008, Leggett & Platt filed a Petition For Review Pursuant To Water Code
10 Section 13320 relating to the June 11, 2008 Order ("July 10, 2008 Petition"). In support of the
11 July 10, 2008 Petition Leggett & Platt simultaneously filed the Declaration of George Linkletter
12 In Support Thereof ("July 10, 2008 Linkletter Declaration"). Additionally, on or about that same
13 date, the owner of the Site, Valley Alhambra Properties ("Valley Alhambra"), filed a Partial
14 Joinder in the July 10, 2008 Petition. Copies of the July 10, 2008 Petition, July 10, 2008
15 Linkletter Declaration and Partial Joinder are attached hereto as **Exhibit B, Exhibit C** and
16 **Exhibit D**, respectively.

17 Concurrently with the filing of the July 10, 2008 Petition, Petitioner submitted a request
18 for reconsideration of the June 11, 2008 Order to the Regional Water Board. A copy of the
19 request for reconsideration is attached hereto as **Exhibit E**. Thus, Petitioner requested that the
20 State Water Board hold the July 10, 2008 Petition in abeyance pursuant to Title 23 of the
21 California Code of Regulations, Section 2050.5(d), pending further good faith discussions
22 between Petitioner and the Regional Water Board.

23 On July 14, 2009, the State Water Board sent Petitioner a letter acknowledging that the
24 July 10, 2008 Petition had been received by the State Water Board and approving Petitioner's
25 request that the July 10, 2008 Petition be held in abeyance. A similar acknowledgment letter was
26 sent to Valley Alhambra in relation to its Partial Joinder in the July 10, 2008 Petition. Copies of
27 both acknowledgement letters are collectively attached hereto as **Exhibit F**. The July 10, 2008
28 Petition has been designated SWRCB/OCC File No. A-1936.

1 In furtherance of Petitioner's request for reconsideration submitted to the Regional Water
2 Board on July 10, 2008, on October 14, 2008, representatives of Leggett & Platt, Valley
3 Alhambra and their consultants, ENVIRON, met with Regional Water Board representatives to
4 discuss the June 11, 2008 Order, July 10, 2008 Petition and supporting July 10, 2008 Linkletter
5 Declaration. During that meeting, the Regional Water Board agreed in concept to a work plan for
6 onsite and offsite investigation intended to result in site closure. Consistent with those
7 discussions, on November 17, 2008, the parties submitted a Work Plan For Additional
8 Investigation ("Work Plan") to the Regional Water Board. In doing so, however, neither Leggett
9 & Platt nor Valley Alhambra waived their objections to the June 11, 2008 Order or their right to
10 reinstate the July 10, 2008 Petition, which is currently held in abeyance by the State Water
11 Resources Control Board. A copy of a November 17, 2008 letter confirming the parties'
12 discussions at the October 14, 2008, and transmitting a copy of the Work Plan to the Regional
13 Water Board, is attached hereto as **Exhibit G**.

14 On November 25, 2008, the Regional Water Board issued a conditional approval of the
15 Work Plan (i.e., the November 25, 2008 Order that is the subject of this Petition). The November
16 25, 2008 Order contains conditions and requirements that go above and beyond what was
17 discussed at the October 14, 2008 meeting with the Regional Water Board. Additionally, as with
18 the June 11, 2008 Order, Petitioner maintains that the Regional Water Board's November 25,
19 2008 Order is inappropriate, improper and not supported by the record. As such, Petitioner is
20 filing the instant Petition to preserve its rights in relation to the November 25, 2008 Order.

21 Petitioner intends to continue to cooperate and negotiate with the Regional Water Board in
22 relation to the investigation of soil and ground water at and about the Site as discussed in the
23 October 14, 2008 meeting without waiving its rights to petition the requirements of the November
24 25, 2008 Order. As such, Petitioner requests that the State Water Board hold this Petition in
25 abeyance, pursuant to Title 23 of the California Code of Regulations Section 2050.5(d), for the
26 maximum time period permitted or until reactivated by Petitioner, as the State Water Board has
27 already done with respect to the July 10 2008 Petition (SWRCB/OCC File No. A-1936).

28 A more detailed recitation of the facts underlying the assessment and remediation of the

1 Site are set forth in the July 10, 2008 Petition, July 10, 2008 Linkletter Declaration and Partial
2 Joinder, which are attached hereto as **Exhibit B**, **Exhibit C** and **Exhibit D**, respectively. For the
3 purpose of brevity, the factual and legal contentions contained in the July 10, 2008 Petition, July
4 10, 2008 Linkletter Declaration and Partial Joinder are not repeated herein verbatim. However,
5 the factual and legal contentions contained in those documents also form the basis of the instant
6 Petition and are incorporated herein by reference. Additionally, Petitioner reserves the right to
7 supplement this Petition with a further statement of reasons if the Petition is reactivated.

8 9 **III. NAME AND ADDRESS OF THE PETITIONER**

10 As explained more fully in Section II of the July 10, 2008 Petition, Leggett & Platt has
11 acted as the administrator of settlement funds used to fund the remediation of the Site pursuant to
12 a settlement agreement between Valley Alhambra, Leggett & Platt and Dresher, Inc. (Leggett &
13 Platt's wholly owned subsidiary).

14 As set forth in the July 10, 2008 Petition, Leggett & Platt's subsidiary, Dresher, Inc., was
15 the survivor of the merger with Harris Hubb, in 1990 and fully vacated the Site in 1991.

16 Valley Alhambra is the owner of the Site and the real party in interest. Nevertheless, the
17 Regional Water Board has issued the Order against Leggett & Platt, without naming Valley
18 Alhambra or making any finding that Leggett & Platt was a potentially responsible party. In light
19 of their respective interests in the outcome of the Petition, Leggett & Platt (as administrator of the
20 settlement fund) and Valley Alhambra (filing a partial joinder as the owner of the Site and an
21 interested party) are jointly concerned about the efficacy of the November 25, 2008 Order. Thus,
22 all correspondence and other written communications regarding this matter should be addressed
23 as follows:

24 Mr. Robert Anderson
25 Leggett & Platt, Incorporated
26 P.O. Box 757
27 Number 1 Leggett Road
28 Carthage, MO 64836

Gary J. Herman, Sr.
1201 S. Olive Street
Los Angeles, California 90015
Telephone: 213-747-6531, Ext. 114

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Facsimile: 213-747-4305
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With copies to:

Joan C. Donnellan, Esq., Counsel for Leggett & Platt
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IV. SPECIFIC ACTION OF THE REGIONAL WATER BOARD THAT PETITIONER REQUESTS THE STATE WATER BOARD REVIEW

Petitioner requests review of the November 25, 2008 Order issued by the Regional Water Board to Petitioner Leggett & Platt. The Order requires the preparation of an assessment report including information specified in the November 25, 2008 Order pursuant to Water Code Section 13267. A copy of the November 25, 2008 Order is attached hereto as **Exhibit A**.

V. DATE OF THE REGIONAL WATER BOARD ACTION

The Order is dated November 25, 2008.

VI. STATEMENT OF REASONS WHY THE REGIONAL WATER BOARD'S ACTION WAS INAPPROPRIATE OR IMPROPER

This Petition presents factual and legal issues that also form the basis of SWRCB/OCC File No. A-1936, which currently is being held in abeyance. Petitioner incorporates herein

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1 Sections V and VIII of its July 10, 2008 Petition, as well as relevant portions of the July 10, 2008
2 Linkletter Declaration, which are attached hereto as **Exhibit B** and **Exhibit C**, respectively.
3 Petitioner requests that the State Water Board hold this Petition in abeyance for the maximum
4 time period permitted or until reactivated by Petitioner. If the need arises, Petitioner will seek to
5 reactivate both this Petition and the July 10, 2008 Petition, and request a single hearing on both
6 matters. Petitioner reserves its right to supplement this Petition with a further statement of
7 reasons if the Petition is reactivated.

8

9 **VII. MANNER IN WHICH THE PETITIONER IS AGGRIEVED**

10 Petitioner is aggrieved by the Order because: (1) closure should have been issued with
11 restrictive covenants when requested by Valley Alhambra in January 2007; (2) the November 25,
12 2008 Order was wrongfully issued solely to Leggett & Platt as the presumed responsible party
13 without including Valley Alhambra and before any determination that Leggett & Platt was a PRP
14 as to the Site; and (3) the November 25, 2008 Order imposes an excessive and unnecessary
15 financial burden on Valley Alhambra and Leggett & Platt (as Fund administrator). This is
16 supported by the Declaration of George Linkletter attached hereto as **Exhibit H**.

17

18 **VIII. THE SPECIFIC ACTION THAT PETITIONER REQUESTS THE STATE BOARD**
19 **TAKE**

20 Petitioner requests that both the June 11, 2008 Order and the November 25, 2008 Order be
21 rescinded in their entirety on the grounds that they are beyond the scope of the investigation
22 necessary to characterize the Site for closure. The State Water Board should direct the Regional
23 Water Board to issue a closure letter for the Site.

24 Alternatively, Leggett & Platt requests that the both the June 11, 2008 Order and
25 November 25, 2008 Order be amended to include Valley Alhambra, the owner of the Site (i.e.
26 4900 Valley Boulevard property), and to limit the orders' application to Leggett & Platt to reflect
27 Leggett & Platt's limited role as the administrator of the settlement funds available to remediate
28 the Site, reserving any order against Leggett & Platt until the Regional Water Board establishes

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1 that Leggett & Platt is a responsible party.

2 Petitioner requests that the State Water Board hold this Petition in abeyance for the
3 maximum time period permitted or until reactivated by Petitioner. Petitioner reserves the right to
4 request further action authorized by Water Code Section 13320 if the Petition is reactivated.

5

6 **IX. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL**
7 **ISSUES RAISED IN THIS PETITION**

8 Petitioner incorporates herein Section VIII of its July 10, 2008 Petition, as well as relevant
9 portions of the July 10, 2008 Linkletter Declaration, which are attached hereto as **Exhibit B** and
10 **Exhibit C**, respectively. This Petition is also supported by the Declaration of George Linkletter
11 attached hereto as **Exhibit H**.

12

13 **X. STATEMENT OF SERVICE OF PETITION TO THE REGIONAL WATER**
14 **BOARD**

15 A copy of this Petition has been sent to the Regional Water Board.

16

17 **XI. STATEMENT THAT THE SUBSTANTIVE ISSUES RAISED IN THE PETITION**
18 **HAVE BEEN RAISED BEFORE THE REGIONAL WATER BOARD**

19 Petitioner is engaged in an ongoing dialogue with the Regional Water Board relating to
20 the investigation of soil and ground water at and about the Site, including the November 25, 2008
21 Order. Thus, Petitioner requests that this Petition be held in abeyance pursuant to Title 23 of the
22 California Code of Regulations, Section 2050.5(d), pending further good faith discussions
23 between Petitioner and the Regional Water Board.

24

25 **XII. REQUEST TO THE REGIONAL BOARD FOR PREPARATION OF THE**
26 **RECORD**

27 Petitioner is requesting that the Regional Water Board prepare the record, including
28 available tape recordings and transcripts, for the hearing on this Petition. A copy of Petitioner's

1 request to the Regional Water Board for preparation of the record is attached hereto as **Exhibit I**.
2 In light of the ongoing dialogue between Petitioner and the Regional Water Board, as well as
3 Petitioner's request that this Petition be held in abeyance to allow further consideration of these
4 matters by the Regional Water Board, Petitioner reserves the right to request that the Regional
5 Water Board supplement the Regional Water Board record prepared pursuant to the attached
6 request with additional and further information and documents submitted to or generated by the
7 Regional Water Board following the preparation of the record by the Regional Water Board as
8 requested by **Exhibit I** hereto. Moreover, pursuant to Water Code Section 13320(b) and Title 23
9 of the California Code of Regulations section 2050.6(a), Petitioner requests that the State Water
10 Board supplement the record before it. Petitioner will advise the State Water Board more
11 specifically in this regard once the Regional Water Board has prepared the record and Petitioner
12 knows what matters have not been included.

13
14 **XIII. REQUEST FOR EVIDENTIARY HEARING**

15 In accordance with Title 23 of the California Code of Regulations section 2050.6(b) and
16 2052(c), Petitioner respectfully requests that the State Water Board hold a hearing to consider this
17 Petition. At the hearing, Petitioner may present additional evidence that was not available to the
18 Regional Water Board at the time the Order was issued or when this Petition is submitted. In
19 addition, Petitioner requests permission at any hearing: (1) to present oral argument on the legal
20 and policy issues raised by this Petition; and (2) to present to the State Water Board factual and
21 technical information in the Regional Water Board's files which may have been overlooked by
22 the Regional Water Board. Given that this Petition presents factual and legal issues that also form
23 the basis of SWRCB/OCC File No. A-1936, which currently is being held in abeyance, Petitioner
24 requests a single hearing on both matters if reactivated.

25
26 **XIV. REQUEST FOR STAY**

27 In accordance with Title 23 of the California Code of Regulations section 2053(a),
28 Petitioner requests a stay of the November 25, 2008 Order. Compliance with the November 25,

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1 2008 Order will cause substantial harm to the Petitioner, including the cost of compliance with
2 the Order, which will exceed \$120,000.00. Moreover, in order to comply with the timelines
3 established by the November 25, 2008 Order, the bulk of these costs will be incurred by
4 ~~Petitioner prior to a hearing on the Petition by the State Water Board unless a stay is granted.¹~~

5 By contrast, there will be no substantial harm to the public interest or other interested
6 parties if a stay is granted because investigation, remediation, and confirmation monitoring, as
7 well as a prior risk assessment, confirm that the current conditions at the Site do not pose a
8 significant risk to human health or the environment. To the contrary, the Regional Water Board
9 has previously indicated that the Site was ready for closure.

10 Finally, there exist substantial questions of fact and law regarding the propriety of the
11 November 25, 2008 Order, including, *inter alia*, Leggett & Platt's contention that the Regional
12 Water Board is without authority to issue a Section 13267 Order against Leggett & Platt except in
13 Leggett & Platt's capacity as administrator of the settlement fund, and Petitioner's contention that
14 the cost of compliance with the November 25, 2008 Order does not bear a reasonable relationship
15 to the need for the additional scope of work and the benefits to be obtained therefrom.

16 Based upon these reasons, as well as the other contentions set forth in this Petition,
17 Petitioner requests a stay of the November 25, 2008 Order pursuant to Title 23 of the California
18 Code of Regulations section 2053(a). Petitioner has attached to this Petition the Declaration of
19 Dr. George Linkletter setting forth proof of the facts alleged in support of its request for stay and,
20 further, requests a hearing on its request for stay to present further relevant evidence and
21 arguments. Petitioner also incorporates herein Section XIII of its July 10, 2008 Petition, as well as
22 relevant portions of the July 10, 2008 Linkletter Declaration, which are attached hereto as
23 **Exhibit B** and **Exhibit C**, respectively.

24
25 **XV. REQUEST THAT PETITION BE HELD IN ABEYANCE**

26 Petitioner requests that the State Water Board hold this Petition in abeyance pursuant to

27
28 ¹ Alternatively, Petitioner may be placed in the position of having to incur substantial fines or penalties for failing to comply with the Regional Water Board order pending a hearing on their Petition.

1 Title 23 of the California Code of Regulations, Section 2050(d) or 2050.5(d), pending further
2 good faith discussions between Petitioner and the Regional Water Board. In this regard,
3 Petitioner notes that the State Water Board has previously granted Petitioner's request to hold the
4 related Petition (SWRCB/OCC File A-1936) in abeyance based upon the same facts and
5 circumstances. Petitioner requests that the State Water Board hold this Petition in abeyance for
6 the maximum time period permitted or until reactivated by Petitioner. Petitioner will promptly
7 notice the State Water Board when it is ready to reactivate and have its Petition considered.
8 Petitioner reserves the right to supplement this Petition if the State Water Board does not grant
9 Petitioner's request for abeyance or should the Petition be reactivated in the future.

10
11 **XVI. CONCLUSION**

12 For the foregoing reasons, Petitioner respectfully submits that the issuance of the
13 November 25, 2008 Order was improper, inappropriate, unlawful, and not supported by
14 substantial evidence. Petitioner respectfully requests that the State Water Board grant this
15 Petition and review the Regional Water Board's action in issuing the November 25, 2008 Order.
16 However, until such time that Petitioner requests the State Water Board to reactivate this Petition,
17 Petitioner requests that the State Water Board hold this Petition in abeyance.

18
19 ~~DATED: December 23, 2008~~

PARKER, MILLIKEN, CLARK, O'HARA &
SAMUELIAN
A Professional Corporation

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By: 

JOAN C. DONNELLAN

Attorneys for Petitioner
Leggett & Platt, Incorporated

EXHIBIT A



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
CalEPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

November 25, 2008

Mr. Robert Anderson
Leggett and Platt, Inc.
One Leggett Road
Carthage, MO 64836

CONDITIONAL APPROVAL OF WORK PLAN FOR ADDITIONAL INVESTIGATION PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER - VALLEY ALHAMBRA PROPERTY, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA (SLIC NO. 0967, SITE ID 204DJ00)

Dear Mr. Anderson:

Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the document titled *Work Plan for Additional Investigations* (Work Plan), dated November 14, 2008; prepared by Environ International Corporation (Environ). The Work Plan was prepared in response to the Regional Board's June 11, 2008, California Water Code (CWC) section 13267 order (Order)(enclosed), directing you to submit a conceptual site model, a work plan for additional soil gas and groundwater investigation on and offsite, and a vapor intrusion evaluation. In addition, the Order directed you to resume groundwater monitoring on a semi-annual basis.

The Work Plan proposes advancing 10 borings on site to collect soil vapor samples from approximately 5 feet below ground surface (bgs). These proposed sampling locations are in the vicinity of the former dip tank and former underground storage tanks. Environ indicates that the soil gas analytical data will be compared with the commercial/industrial California Human Health Screening Levels (CHHSLs) and, if necessary, a vapor intrusion evaluation will be prepared. In addition, the Work Plan proposes collection of grab groundwater samples via hydropunch from five off-site locations to determine if groundwater impacted by releases of volatile organic compounds (VOCs) has migrated beneath the adjacent property.

Based on our review of the Work Plan and other file documents, we approve the Work Plan, provided the following conditions are met:

1. To assess residual VOCs in soil vapor at or near the former source areas, additional soil vapor sampling locations are needed beyond what is proposed in the Work Plan. Specifically, you are required to collect a soil vapor sample at 5 feet bgs in the area of the previous soil sampling location identified as SB6 (adjacent to former paint dip tank). Furthermore, one additional soil vapor sample must be collected at 5 feet bgs in close proximity to the previous soil vapor sampling location identified as SG-7 (adjacent to the former methylene chloride dip tank). The sampling methodology and laboratory analysis for these additional borings/samples should be consistent with the Work Plan.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

2. The Work Plan proposes drilling five off-site borings to approximately 3 feet beyond first encountered groundwater, which has historically ranged between 10 to 14 feet below ground surface. As directed in the Order, you are required to conduct an investigation of the physical properties of the saturated zone (including laboratory sieve analysis of soil matrix samples) and collection of discrete vertical groundwater samples. Investigation of the saturated zone must include continuous coring until a competent clay boundary with a minimum thickness of 5 feet is encountered. Multi-depth and discrete groundwater samples must be collected from water bearing zones or at a minimum of every 10 feet if the lithology appears consistent over a large depth interval.
3. If any soil vapor data from the proposed investigation have concentrations of contamination above the commercial/industrial CHHSLs, you are required to submit a vapor intrusion human health risk evaluation to the Regional Board using site specific physical and chemical data. Considering the delayed field work, the due date for submittal of the vapor intrusion evaluation is extended from December 19, 2008 (required in the Order) to **March 31, 2009**. This report may be included with the assessment report (see below) following completion of the field sampling and laboratory analysis. The Regional Board does not have a toxicologist on staff and will request the assistance of the California Office of Environmental Health Hazard Assessment (OEHHA) in reviewing the vapor intrusion evaluation to ensure protection of human health at the site. Please provide all input data and calculations for screening and/or modeling purposes in this report so that Regional Board and OEHHA staff can validate the risk calculations. The following document can be referenced for completion of a site-specific vapor intrusion evaluation: "Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air", dated December 15, 2004 (revised February 7, 2005), prepared by the California Department of Toxic Substances Control.
4. As directed in the Order, you were required to submit a site conceptual model (SCM) concurrently with the Work Plan. Because the Work Plan does not include a SCM, you are required to prepare, using existing and new data, and include the SCM in the assessment report following additional site investigation due by **March 31, 2009**. The goals of the SCM are to identify how the distribution of contaminants in soil, soil vapor, and groundwater have changed in space and time; potential current and future receptors; and, environmental issues that need to be addressed.
5. As directed in the Order, you are required to resume monitoring of the existing groundwater wells at the site according to the semi-annual schedule and requirements specified in the Order, with the July through December 2008 groundwater monitoring report due to the Regional Board no later than **January 31, 2009**.
6. The Work Plan indicates that Environ will update its previous site specific Health and Safety Plan (HASP) for the proposed field work. Please submit a copy of the updated HASP for our records at least 10 days prior to the start of field work. This HASP must be onsite during any work to be completed in accordance with the Work Plan. Furthermore, a health and safety briefing should be conducted with all site personnel on a daily basis, prior to commencing fieldwork.

California Environmental Protection Agency



Mr. Robert Anderson
Leggett & Platt

- 3 -

November 25, 2008

7. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.
8. Following the completion of the field work and laboratory analysis, an assessment report presenting the results of soil gas and groundwater/lithologic investigation, a SGM, and a vapor intrusion evaluation, if necessary, shall be submitted to the Regional Board no later than **March 31, 2009**.
9. As indicated in the Order, based on the results of the hydropunch groundwater sampling, additional investigation and multi-depth monitoring wells on and offsite may be required until the vertical and lateral extent of the groundwater contamination originating from the site are fully defined.

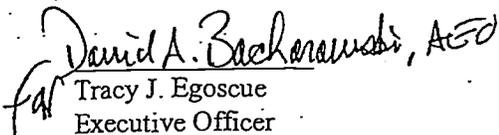
Pursuant to section 13267 of the CWC, you are required to submit an assessment report including all required information, and groundwater monitoring reports according to the schedule specified above. Please provide us with two hard copies of the assessment report. One copy will be forwarded to the OEHHA for review, if necessary.

Pursuant to section 13268 of the CWC, failure to submit the required technical reports by the specified due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1000) for each day the technical reports are not received.

Any person aggrieved by this action of the Regional Water Board may petition the 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.

If you have any questions, please feel free to contact Mr. David Young at (213) 576-6733, or via email at dyoung@waterboards.ca.gov.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosure: Regional Board Order dated June 11, 2008

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Robert Anderson
Leggett & Platt

- 4 -

November 25, 2008

cc: Mr. Gordon Billheimer, Leggett & Platt
Ms. Linda Northrup, Northrup Schlueter
Mr. Gary Herman, S.D. Herman Co.
Mr. Gary Meyer, Parker, Milliken, Clark, O'Hara & Samuelian
Ms. Joan Donnellan, Parker, Milliken, Clark, O'Hara & Samuelian
Dr. George Linkletter, Environ
Mr. Eddie Arslanian, Environ
Ms. Seema Sutarwala, Environ

California Environmental Protection Agency

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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

EXHIBIT B

1 Joan C. Donnellan SBN 79462
 Gary A. Meyer SBN 94144
 2 Pedram F. Mazgani SBN 204808
 PARKER, MILLIKEN, CLARK, O'HARA & SAMUELIAN
 3 A Professional Corporation
 555 S. Flower St., 30th Floor
 4 Los Angeles, California 90071-2440
 Telephone: (213) 683-6500
 5 Facsimile: (213) 683-6669
 6 Attorneys for Petitioner
 Leggett & Platt, Incorporated
 7



8 STATE OF CALIFORNIA
 9 STATE WATER RESOURCES CONTROL BOARD

<p>11 IN THE MATTER OF THE PETITION OF LEGGETT & PLATT, 12 INCORPORATED, FOR REVIEW OF WATER CODE SECTION 13267 13 ORDER DATED JUNE 11, 2008, BY THE CALIFORNIA REGIONAL 14 WATER QUALITY CONTROL BOARD, LOS ANGELES REGION,</p>	<p>Petition No. PETITION FOR REVIEW PURSUANT TO WATER CODE SECTION 13320 AND 23 C.C.R. SECTION §2050 ET SEQ. [Request To Be Held In Abeyance Under 23 C.C.R. §2050.5(d)] DECLARATION OF GEORGE LINKLETTER IN SUPPORT THEREOF</p>
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PARKER MILLIKEN
 CLARK O'HARA &
 SAMUELIAN, A
 PROFESSIONAL
 CORPORATION

28 330418 (4009 700)

PETITION FOR REVIEW

DOCS

1 **I. INTRODUCTION**

2 Pursuant to Water Code Section 13320 and Title 23 of the California Code of Regulations,
3 Section 2050 et seq., Petitioner Leggett & Platt, Incorporated, a Missouri corporation ("Leggett &
4 Platt") hereby petitions the State Water Resources Control Board ("State Water Board") for
5 review of a Water Code Section 13267 Order ("Order") issued on June 11, 2008 by the Executive
6 Officer of the California Regional Water Quality Control Board, Los Angeles Region ("Regional
7 Water Board"), which would require Petitioner to submit a work plan for additional investigation
8 of soil gas and ground water at and about 4900 Valley Boulevard, Los Angeles, California
9 ("Site").

10 The Site has been subject to years of prior assessment, remediation, and monitoring
11 activities subject to the oversight of the Regional Water Board. Indeed, the soil was extracted in
12 the area of identified contamination in 1993 and subsequently the identified area on the Site was
13 completely and successfully remediated with a gas vapor extraction process under the supervision
14 of the Regional Water Board. After the gas vapor extraction was completed, the Site was
15 monitored and sampled extensively as instructed by the Regional Water Board. In 2004, the
16 Regional Water Board authorized removal of the monitoring equipment and the cessation of any
17 further investigation or remediation activities at the Site. (See Linkletter Declaration)

18 The sole condition to close the Site was the Regional Water Board's request that Valley
19 Alhambra (the Site owner) sign a deed restriction. Yet when Valley Alhambra agreed to accept
20 the deed restriction in January 2007, the Regional Water Board failed to issue a closure; rather,
21 the Regional Water Board, with no new evidence and with no factual or legal basis, decided to
22 issue the Section 13267 Order, essentially re-opening the Site and requiring Petitioner to start the
23 investigation and remediation process all over again.

24 Complying with the Order will require Petitioner to reinstall equipment that the Regional
25 Water Board allowed to be shutdown and removed, and will require Petitioner to re-perform
26 characterization and investigation of the same Site including, without limitation, sampling,
27 analysis, reporting, and other work that has already been done and accepted by the Regional
28 Water Board. Yet the Regional Water Board has no new evidence or any evidence of any change

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SAMUELIAN, A
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1 at the Site to justify re-doing what has already been done at a previously remediated Site. Thus,
2 pursuant to Water Code Section 13320, Petitioner requests that the State Water Board review the
3 Regional Water Board's Section 13267 Order, rescind the Order on the grounds that it is beyond
4 the scope of the investigation necessary to characterize the Site for closure, and direct the
5 Regional Water Board to grant closure of the Site without further unnecessary expenditure by
6 Petitioners.

7 Concurrently with the filing of this Petition, Petitioner will pursue reconsideration of the
8 Order by the Regional Water Board. Thus, Petitioner requests that the State Water Board hold
9 this Petition in abeyance pursuant to Title 23 of the California Code of Regulations, Section
10 2050.5(d), pending further good faith discussions between Petitioner and the Regional Water
11 Board.

12 13 **II. NAME AND ADDRESS OF THE PETITIONER**

14 Leggett & Platt has acted as the administrator of settlement funds used to fund the
15 remediation of the Site pursuant to a settlement agreement between Valley Alhambra and Leggett
16 & Platt and Dresher, Inc., its wholly owned subsidiary. The remediation process is documented in
17 reports filed with the Regional Water Board by Environ and referred to in George Linkletter's
18 Declaration. Notably, the settlement was a resolution of a disputed claim regarding
19 contamination at the Site after Leggett & Platt's subsidiary Dresher, Inc. vacated the Site in 1991.
20 The settlement was intended to terminate expensive protracted litigation in favor of remediating
21 the alleged contamination at the Site. Neither party admitted liability. There has been no finding
22 of liability against Leggett & Platt or Dresher, Inc. for contamination at the Site.

23 Valley Alhambra is the owner of the Site and the real party in interest. Nevertheless, the
24 Regional Water Board has issued the Order against Leggett & Platt, without naming Valley
25 Alhambra. In light of their respective interests in the outcome of the Petition, Leggett & Platt (as
26 administrator of the settlement fund) and Valley Alhambra (filing a partial joinder as the owner of
27 the Site and an interested party) are jointly concerned about the efficacy of the pending order.

28 Thus, all correspondence and other written communications regarding this matter should be

1 addressed as follows:

2 Mr. Robert Anderson
3 Leggett & Platt, Incorporated
4 P.O. Box 757
Number 1 Leggett Road
Carthage, MO 64836

5 Gary J. Herman, Sr.
6 See Partial Joinder filed by Valley Alhambra
7 Los Angeles, California

8 With copies to:

9 Joan C. Donnellan, Esq., , Counsel for Leggett & Platt
10 Gary Meyer, Esq.
11 Pedram Mazgani, Esq.
12 Parker, Milliken, Clark, O'Hara & Samuelian
13 A Professional Corporation
14 555 S. Flower St., 30th Floor
Los Angeles, CA 90071-2440
Telephone: (213) 683-6500
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JDonnellan@pmcos.com
GMeyer@pmcos.com
PMazgani@pmcos.com

15 Linda Northrup, Counsel for Valley Alhambra
16 Northrup Schlueter
17 31365 Oak Crest Drive
Suite 250
Westlake Village, CA 91361

18 **III. SPECIFIC ACTION OF THE REGIONAL WATER BOARD THAT PETITIONER**
19 **REQUESTS THE STATE WATER BOARD REVIEW**

20 Petitioner requests review of the Section 13267 Order issued by the Regional Water Board
21 on June 11, 2008 to Petitioner Leggett & Platt. The Order requires the preparation of a work plan
22 for additional investigation of soil gas and ground water at and about the Site pursuant to Water
23 Code Section 13267. A copy of the Order is attached hereto as **Exhibit A**.

24
25 **IV. DATE OF THE REGIONAL WATER BOARD ACTION**

26 The Order is dated June 11, 2008.
27

28

1 V. STATEMENT OF REASONS WHY THE REGIONAL WATER BOARD'S
2 ACTION WAS INAPPROPRIATE OR IMPROPER

3 As explained more fully below, the issuance of the Order was beyond the authority of the
4 Regional Water Board and was inappropriate, improper and not supported by the record for the
5 following reasons:

- 6 • The Order contains findings of fact that are not supported by substantial evidence
7 in the record;
- 8 • Investigation, remediation, and confirmation monitoring activities, as well as the
9 data derived from these activities, evidence that current conditions of the soil and
10 ground water at the Site do not pose a substantial risk to human health or the
11 waters of the State;
- 12 • Given the extensive work performed at the Site over the last 10 years,
13 characterization of the Site is sufficient to understand the pre- and post-remedial
14 conditions at the Site;
- 15 • The burden, including costs of compliance, imposed on Petitioner by the Order
16 does not bear a reasonable relationship to the benefits that may be obtained from
17 the reports and investigations sought by the Order;
- 18 • Valley Alhambra should be included in the 13267 Order as the owner of the
19 property located at 4900 Valley Boulevard as Leggett & Platt's Dresher subsidiary
20 has not occupied the Site for almost 18 years and has no legal rights to use,
21 manage, control, alter, modify or dispose of the Site. Any inclusion of Leggett &
22 Platt in a 13267 Order should be specifically limited to its role as the administrator
23 of the settlement fund pending a determination of its status as a potentially
24 responsible party;
- 25 • Investigation, remediation, and confirmation monitoring to date justifies closure of
26 the Site without further investigation.

27 A more complete explanation of the statement of reasons why the Regional Water Board's Order
28 is inappropriate and improper is set for in Section VIII of this Petition, which is incorporated

1 herein.

2 Petitioner requests that the State Water Board hold this Petition in abeyance for the
3 maximum time period permitted or until reactivated by Petitioner. Petitioner reserves its right to
4 supplement this Petition with a further statement of reasons if the Petition is reactivated.

5

6 **VI. MANNER IN WHICH THE PETITIONER IS AGGRIEVED**

7 Petitioner is aggrieved by the Order because: (1) Closure should have been issued with
8 restrictive covenants when requested by Valley Alhambra in January 2007; (2) the Section 13267
9 Order was wrongfully issued solely to Leggett & Platt as the presumed responsible party without
10 including Valley Alhambra and before any determination that Leggett & Platt was a PRP as to the
11 Site; and (3) the Order imposes an excessive and unnecessary financial burden on Valley
12 Alhambra and on Leggett & Platt (as Fund administrator).

13

14 **VII. THE SPECIFIC ACTION THAT PETITIONER REQUESTS THE STATE BOARD**
15 **TAKE**

16 Petitioner requests that the Order be rescinded in its entirety on the grounds that it is
17 beyond the scope of the investigation necessary to characterize the Site for closure. The State
18 Water Board should direct the Regional Water Board to issue a closure letter for the Site.

19 Alternatively, Leggett & Platt requests that the Order be amended to include Valley
20 Alhambra, the owner of the Site (i.e. 4900 Valley Boulevard property), and to limit the Order's
21 application to Leggett & Platt to reflect Leggett & Platt's limited role as the administrator of the
22 settlement funds available to remediate the Site, reserving any order against Leggett & Platt until
23 the Regional Water Board establishes that Leggett & Platt is a responsible party with respect to
24 the scope of the current order or any subsequent order pertaining to Site investigation or
25 characterization.

26 Petitioner requests that the State Water Board hold this Petition in abeyance for the
27 maximum time period permitted or until reactivated by Petitioner. Petitioner reserves the right to
28 request further action authorized by Water Code Section 13320 if the Petition is reactivated.

1
2 **VIII. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL**
3 **ISSUES RAISED IN THIS PETITION**

4 **A. APPLICABLE STANDARD OF REVIEW**

5 Any aggrieved person may petition the State Water Board to review an action or failure to
6 act by a Regional Water Board within 30 days of such action or failure. Water Code §13320(a).
7 Pursuant to Water Code section 13320(c), the State Water Board may find that the actions of a
8 Regional Water Board were inappropriate or improper. Upon finding that the action of a
9 Regional Water Board, or the failure of a Regional Water Board to act, was inappropriate or
10 improper, the State Water Board may take the appropriate action, direct the Regional Water
11 Board to take the appropriate action, and/or refer the issue to another state agency with
12 jurisdiction. Water Code §13320(c). The State Water Board is vested with all the powers of the
13 Regional Water Board for purposes of taking such actions. Water Code §13320(c).

14 Upon a Water Code Section 13320 Petition, the State Water Board must review the
15 Regional Water Board record to determine if there is sufficient evidence ensuring an appropriate
16 and proper action by the Regional Water Board. *See* Water Code §13320. The State Water Board
17 is required to make an independent review of the Regional Water Board action to determine
18 whether the weight of the evidence supports the issuance of the Regional Water Board's order. *In*
19 *the Matter of the Petition of Exxon Company, U.S.A., et al. of the Adoption of the Cleanup and*
20 *Abatement Order No. 85-066 by the California Regional Water Quality Control Board, Central*
21 *Valley Region, Order No. WQ 85-7, at p. 10 (standard of State Water Board review under Section*
22 *13320 requires independent judgment as to whether the action was reasonable).*

23 In reviewing a decision of a Regional Water Board, the State Water Board is not subject to
24 the same strict standards that govern court review of administrative actions. *See* Cal. Water Code
25 § 13320; *In the Matter of the Petition of Exxon Company, supra, Order No. WQ 85-7, at p. 10.*
26 Rather, the State Water Board must consider both the record before the Regional Water Board
27 and "any other relevant evidence" when reviewing an order. Water Code §13320(b). Thus, the
28 scope of review is "closer to that of independent review." *In the Matter of the Petition of Exxon*

1 *Company, supra*, Order No. WQ 85-7, at pp. 10, 12.

2 To uphold the Regional Water Board's challenged action as appropriate and proper, the
3 State Water Board must conclude that the action was "based on substantial evidence." *See Cal.*
4 *Water Code § 13320; In the Matter of the Petition of Exxon Company, supra*, Order No. WQ 85-
5 7, at pp. 10, 12.

6
7 **B. THE REGIONAL WATER BOARD HAS IMPROPERLY ISSUED THE**
8 **WATER CODE 13267 ORDER TO ONLY LEGGETT & PLATT**
9 **WITHOUT SUBSTANTIAL EVIDENCE IN THE RECORD THAT**
10 **LEGGETT & PLATT HAS DISCHARGED OR IS THREATENING TO**
11 **DISCHARGE WASTE AFFECTING WATER QUALITY; THE ORDER**
12 **SHOULD BE AMENDED TO REFLECT LEGGETT & PLATT'S ROLE AS**
13 **THE ADMINISTRATOR OF SETTLEMENT FUNDS**

14 In relevant part, Water Code Section 13267(b)(1) authorizes a Regional Water Board to
15 "require that any person who has discharged, discharges, or is suspected of having discharged or
16 discharging, or who proposes to discharge waste within its region ... shall furnish, under penalty
17 of perjury, technical or monitoring program reports which the regional board requires." The
18 Regional Board has not established that Leggett & Platt has discharged waste at the Site which
19 would be the subject of the current Order and, as such, the Regional Water Board has exceeded its
20 authority under Water Code Section 13267 by issuing its Order against Leggett & Platt.

21 The State Water Board has recognized that it is important for orders to explain the basis
22 for naming persons under Sections 13267 and 13304. *See e.g., In the Matter of the Petition of Mr.*
23 *Kelly Engineer/All Star Gasoline. Inc.*, Order No. WQO - 2002-0001, at pp. 4-5 (holding that
24 because Administrative Civil Liability Order did not contain requisite findings to justify
25 individual's responsibility under Section 13267 the matter must be remanded to regional board to
26 "separately name each responsible party, and include the justification for each named party."); *see*
27 *also, In the Matter of the Petition of Exxon Company, supra*, Order No. WQ 85-7, at p. 10-11
28 ("[T]here must be a reasonable basis on which to name each party. There must be substantial

1 evidence to support a filing of responsibility for each party named. This means credible and
2 reasonable evidence which indicates the named party has responsibility.”)

3 Further, while Section 13267 broadly authorizes the regional water boards to require
4 persons who “are suspected to have discharged” wastes to prepare technical reports, “[w]hen
5 acting under this broad authority, regional boards must identify the evidence that supports
6 requiring that person to provide the reports.” *In Re Petition for Review of Technical Report
7 Order/Chevron Products Co*, Order No. WQO 2004-0005, at p. 4. Moreover, if later
8 investigations do not support the regional water board’s initial “suspicions” then that person can
9 no longer be required to prepare further technical reports under Section 13267. *Id.* at pp. 6-8
10 (holding that regional board appropriately ordered Chevron to conduct an investigation during the
11 initial phases of the investigation but evidence gathered during the earlier investigations does not
12 support continuing requirements imposed on Chevron); *see also*, *Petition of Larry and Pamela
13 Canchola for Review of Water Code Section 13267 re MTBE*, Order No. 2003-0020, at p. 3, 7-8
14 (holding that regional board cannot require petitioners to further investigate MTBE pollution at
15 UST site because there is substantial evidence in the existing record that petitioners are not
16 responsible for MTBE pollution).

17 Contract Metal Fabricators (a.k.a. Harris Hubb), the predecessors of the current Dresher,
18 Inc. conducted assembly operations at the Site and leased the Site from Harold Roach, the
19 predecessor of Valley Alhambra, to “assemble” and “paint” bed frames. Evidence produced in
20 connection with the litigation settled in 2000 demonstrated that bed frames were delivered,
21 assembled and painted at the Site from about 1973 to 1990. A subsidiary of Leggett & Platt
22 acquired the stock of the former Dresher, Inc. on June 19, 1990, and the subsidiary took the name
23 of Dresher, Inc., which is the current Dresher entity. The current Dresher, Inc. was not a party to
24 the lease of 4900 Valley Boulevard (Site) nor did it operate the facility at that Site. Shortly after
25 the June 19, 1990 stock acquisition, the current Dresher, Inc. shut down and transferred the plant
26 operations to a different facility in Whittier, California, ultimately ceasing all activity at the Site
27 in early 1991 and vacating the Site thereafter. Leggett & Platt has no ownership rights to the Site
28 and no legal right to manage or operate the Site.

1 Leggett & Platt has agreed to manage a fund to remediate the Site pursuant to a settlement
2 agreement with Valley Alhambra executed in September of 2000. The settlement agreement
3 stipulated that neither Leggett & Platt nor Valley Alhambra admitted liability. To date, Leggett &
4 Platt's dealings with the Regional Water Board in relation to the Site have been in its capacity as
5 administrator of the settlement fund. Consequently, the Regional Water Board has exceeded its
6 statutory authority by issuing a Section 13267 Order to Leggett & Platt as a responsible party
7 because the Regional Water Board failed to identify substantial evidence in support of its decision
8 to issue the Section 13267 Order to Leggett & Platt as a potentially responsible party. Thus, the
9 State Water Board should amend the Order to clarify that Leggett & Platt is being named in the
10 Order in its capacity as administrator of the settlement fund. Further, Leggett & Platt reserves the
11 right to dispute the Regional Water Board's issuance of any future Order's directed to Leggett &
12 Platt in any capacity other than as administrator of the settlement fund.

13
14 **C. DATA FROM GROUND WATER SAMPLING REPORTS PREPARED BY**
15 **ENVIRON AND SUBMITTED TO THE REGIONAL WATER BOARD**
16 **SHOW THAT THE CURRENT CONDITION OF THE SOIL AND**
17 **GROUND WATER DOES NOT POSE A SUBSTANTIAL RISK TO THE**
18 **WATERS OF THE STATE OR THE GENERAL ENVIRONMENT AND IS**
19 **COMPLIANT WITH THE CURRENT CONDITIONS FOR SITE**
20 **CLOSURE**

21 The Site has been subject to years of prior assessment, remediation, and monitoring
22 activities under the oversight of the Regional Water Board. As detailed more fully in the
23 Regional Water Board record, these activities have included soil and ground water investigation,
24 successful remediation including soil extraction in 1993 and utilizing a gas vapor extraction
25 process, confirmation monitoring and sampling, and a risk assessment for the Site as recounted in
26 George Linkletter's Declaration. Indeed, following these activities, the Regional Water Board
27 authorized removal of the monitoring equipment and the cessation of any further environmental
28 related activities at the Site. As a result of the investigation, remediation, and confirmation

1 monitoring Environ has concluded that the current soil and ground water conditions at the Site do
2 not pose a substantial risk to human health or the environment based upon, *inter alia*, the
3 following factors:

- 4 • The Site is located atop shallow alluvial deposits, which lie above a non-waterbearing
5 formation. Further, borings and wells installed at the Site confirm that the water-bearing
6 strata at the Site is locally non-contiguous and that there is relatively little water present.
7 In light of these data, contamination detected in shallow ground water beneath the Site
8 does not pose a threat to aquifers that may be present down valley to the west of the Site
- 9 • There are no public supply or privately owned wells within a one-mile radius of the Site.
- 10 • Ground water testing between 2001 and 2003 demonstrated that PCE levels in the ground
11 water beneath the Site were reduced by orders of magnitude (e.g., from a peak of 4,800
12 µg/l to 26 ug/l at MW2, which is located immediately adjacent to the source area at the
13 Site) as a result of Regional Water Board approved remediation at the Site.
- 14 • Investigations relating to historic operations at the Site are inconclusive regarding the
15 cause of the PCE contamination at the Site but clearly defined the source area. Given the
16 results of the assessment, investigation, and remediation history of the Site it appears that
17 source contamination at the Site has been sufficiently remediated and remaining materials
18 do not pose a substantial risk to human health or the environment.
- 19 • Data collected from monitoring wells and soil borings along the western property line of
20 the Site (as well as other data points located downgradient from the source area), when
21 compared to substantially higher contamination levels in the source area on the Site and
22 within the context of the hydrostratigraphy at the Site, indicate only limited migration of
23 contaminants away from the source area.
- 24 • The radius of influence of the remediation system that operated at the Site, which include
25 an extraction well immediately adjacent to the Site's western property line, indicate that
26 the remedial process also addressed adjacent contamination which may have migrated to
27 the downgradient property.
- 28 • The analytical results from the deepest samples were judged reflective of ground water

1 conditions and demonstrated only low or nondetectable concentrations of contaminants
2 along the western Site boundary prior to the startup of the remediation system.

3 • Environ prepared a "Risk Assessment of Potential Migration of VOCs to Indoor Air,"
4 dated November 28, 2005, which concluded that the "cumulative cancer risks are no
5 higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water
6 Board provide an NFA designation for "unrestricted use for the site." In its April 17,
7 2006 memorandum addressed to the Regional Water Board, OEHHA stated that it agreed
8 with Environ's conclusions regarding the risk assessment.

9 • Remaining contamination at and beneath the Site should dissipate without further active
10 remediation and there is no evidence to suggest that it will pose a significant risk to
11 human health or the environment.

12 Based upon the above-listed factors, Petitioner maintains that soil and ground water
13 conditions at the Site do not pose a substantial risk to human health or the environment, that there
14 is no need for further investigation at or downgradient from the Site, and, further, that closure
15 should be granted. Further, given the extensive work performed at the Site over the last 10 years,
16 characterization of the Site is sufficient to understand the pre- and post-remedial conditions at the
17 Site. The Regional Water Board has failed to present "substantial evidence" in support of the
18 further investigation required by the Order.

19
20 **D. THE REGIONAL WATER BOARD HAS NOT PROVIDED PRIMA FACIE**
21 **EVIDENCE TO SHOW A CHANGE IN CONDITIONS SINCE IT**
22 **ORDERED THE REMEDIATION EQUIPMENT REMOVED AND**
23 **STATED THAT THE SITE WAS ELIGIBLE FOR CLOSURE, SUBJECT**
24 **TO RESTRICTIVE COVENANTS**

25 The Site has been subject to years of prior assessment, remediation, and monitoring
26 activities. Indeed, the Site was completely and successfully remediated with a gas vapor
27 extraction process, and after the gas vapor extraction was completed, the Site was monitored and
28 sampled extensively as instructed by the Regional Water Board. As established by the following

1 timeline of events, the Regional Water Board authorized removal of the monitoring equipment
2 and the cessation of any further environmental related activities at the Site:

- 3 • On April 30, 2001, Environ submitted an "Interim Remedial Action Plan" (IRAP)
4 to address subsurface volatile organic compounds (VOCs) at the Site. The
5 Regional Water Board authorized the implementation of the work on June 8,
6 2001. The remediation system, consisting of 2-PHASE soil vapor and ground
7 water extraction, began operating on December 6, 2001.
- 8 • Following an October 8, 2002 on-site meeting with representatives from Environ
9 (George Linkletter, Eddie Arslanian, and Bita Tabatabai) and the Regional Water
10 Board (David Young and J.T. Liu), it was mutually agreed to shut down the
11 remediation system in order to evaluate possible rebound in ground water. On
12 October 15, 2002, Environ submitted to the Regional Water Board a "Request for
13 Post-Remediation Monitoring" documenting the outcome of the October 8, 2002
14 meeting.
- 15 • Following the agreed upon number of post-remediation ground water monitoring
16 events, a meeting was held on November 18, 2003 between representatives from
17 Environ (George Linkletter, Bita Tabatabai, and Eddie Arslanian) and the
18 Regional Water Board (David Young and J.T. Liu) to discuss the data from the
19 post-remediation ground water monitoring and protocols for confirmation soil
20 sampling and a final round of ground water monitoring as a prelude to site closure
21 (No Further Action [NFA] designation).
- 22 • On December 3, 2003, Environ submitted its "Work Plan for Confirmation Soil
23 Sampling and Final Round of Groundwater Sampling." The work plan included
24 an historical summary of the soil, soil gas, and ground water data collected from
25 the Site. In a December 9, 2003 email, Mr. Young approved the work plan.
- 26 • In a January 16, 2004 email Environ submitted to the Regional Water Board the
27 results of the confirmation soil sampling and final round of ground water
28 sampling and requested an NFA designation for the Site.

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- In a February 11, 2004 email Environ followed up with Mr. Young on the status of the NFA.
- In a February 24, 2004 email Mr. Young requested a few items after talking to Regional Water Board “management” for the “closure process.”
- In a March 25, 2004 email Environ submitted a case review form via electronic mail.
- Following various emails between Environ and Regional Water Board staff in a June 30, 2004 email Mr. Liu stated that Mr. Young had begun working on the NFA designation for the Site.
- In an August 10, 2004 email Environ once again submitted information to Mr. Young regarding the Site use history.
- Following various emails between Environ and Regional Water Board staff in an October 1, 2004 email Mr. Liu stated that the closure was discussed with Dr. Arthur Heath, Remediation Section Chief.
- In an October 6, 2004 telephone conversation with Mr. Liu, Environ informed the Regional Water Board that the Site is not located within the San Gabriel Valley Superfund Area. Also, Mr. Liu stated that a deed restriction would be placed as part of the NFA designation for the Site, restricting the use to non-sensitive receptors (i.e., excluding uses such as residential, schools, health care). In an October 6, 2004 email Environ confirmed its understanding of the results of the telephone discussion held earlier that day.
- To address the Regional Water Board’s concern that a deed restriction would be required for unrestricted future use, and the implications of VOCs remaining in soil and ground water, Environ prepared a “Risk Assessment of Potential Migration of VOCs to Indoor Air,” dated November 28, 2005. The risk assessment concluded that the “cumulative cancer risks are no higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water Board provide an NFA designation for “unrestricted use for the site.”

- 1 • The Regional Water Board submitted the risk assessment to the Office of
2 Environmental Health Hazard Assessment (OEHHA) for review. In its April 17,
3 2006 memorandum addressed to the Regional Water Board OEHHA stated that it
4 agreed with Environ's conclusions regarding the risk assessment, but raised
5 certain questions for Regional Water Board consideration.
- 6 • On January 19, 2007, representatives from Environ (George Linkletter, CY Jeng,
7 Eddie Arslanian), the Regional Water Board (Adnan Siddiqui and David Young),
8 and representatives of the Site owner (Linda Northrup, counsel for the Site
9 owners and Gary J. Herman, Sr.) and representatives of Leggett & Platt (Joan
10 Donnellan, counsel for Leggett & Platt as administrator of the settlement fund)
11 met to discuss the outstanding items raised in the OEHHA memo. Valley
12 Alhambra waived its objections to executing restrictive covenants that run with
13 the land as a condition of closure. The Regional Water Board agreed on an
14 approach to address the various comments made by OEHHA. At the January 19,
15 2007 meeting Messrs. Siddiqui and Young indicated that they would discuss with
16 Regional Water Board upper management whether there would be a need to
17 conduct a post-remediation soil vapor study to confirm that there had been no
18 change in the Site from the last ground water sampling as part of the closure
19 process.

20 Throughout the above timeline of events Petitioner, Valley Alhambra and Environ were
21 lead to understand, based upon the representations made by the Regional Water Board, that
22 closure would be granted for the Site (either with or without a deed restriction). Nevertheless,
23 when Environ (George Linkletter, Eddie Arslanian, Seema Sutarwala) and the Regional Water
24 Board staff (Su Han and David Young) met on May 16, 2008, the Regional Water Board staff
25 stated that additional work would be required prior to obtaining closure for the Site. Thereafter,
26 on June 11, 2008, the Regional Water Board issued the Section 13267 Order. Regional Water
27 Board staff, however, did not identify any new evidence or changed circumstances that would
28 justify the Regional Water Board's apparent change in position.

1 As evidenced by the above timeline, the Regional Board had previously indicated that the
2 Site qualified for closure based on extensive ground water monitoring after a comprehensive
3 remediation had been completed in 2004. There have been no changes in the condition of the Site
4 ~~or new or additional facts to support reopening the investigation.~~ To the contrary, investigation,
5 assessment, and remediation activities conducted at the Site support closure at this time. The
6 Regional Water Board bears the burden of establishing by substantial evidence the need for
7 additional investigation after the Regional Water Board has previously authorized the removal of
8 the monitoring equipment and the cessation of any further environmental related activities at the
9 Site.

10
11 **E. THE COST ASSOCIATED WITH THE INVESTIGATION REQUIRED BY**
12 **THE ORDER HAS NO REASONABLE RELATIONSHIP TO THE**
13 **NOMINAL THREAT CAUSED BY THE RESIDUAL TRACES OF**
14 **CHEMICALS IN SOIL AND GROUND WATER AT THE SITE**

15 In relevant part, Water Code Section 13267(b)(1) provides that the “burden, including
16 costs, of these reports shall bear a reasonable relationship to the need for the report and the
17 benefits to be obtained from the reports.” Water Code Section 13267(b)(1) further provides that
18 in “requiring those reports, the regional board shall provide the person with a written explanation
19 with regard to the need for the reports, and shall identify the evidence that supports requiring that
20 person to provide the reports.”

21 While the statute may not require a formal “economic analysis,” it does place an
22 obligation on the Regional Water Board to come forward with *prima facie* evidence that the
23 burdens, including the costs, of the study are reasonable relative to the benefits. Where the benefit
24 is nominal or nonexistent, a disproportionately high cost will invalidate the request. *See, In the*
25 *Matter of the Petitions of the City of Pacific Grove*, Order No. WQ 82-8, at pp. 5-7, 14 (holding
26 that record contained ample evidence of the need for a study under Section 13267 but that “the
27 scope of the study is excessive resulting in unreasonably high costs” and, thus, should be
28 modified); *see also, In re the Matter of the Petition of Pacific Lumber Company and Scotia*

1 *Pacific Company LLC*, Order WQ 2001-14, at pp. 9-10 (“Information that is required to be
2 provided under Section 13267 is subject to the requirement that “[t]he burden, including costs of
3 these reports shall bear a reasonable relationship to the need for the reports and benefits to be
4 obtained from the reports.”).

5 In the present case, the Order requires an extensive work plan, investigation, technical
6 reports, and monitoring that will result in significant and unnecessary costs. The burden placed
7 on Petitioner, as the administrator of the settlement fund, and Valley Alhambra, as the owner of
8 the Site, by the Order far exceeds the benefit that the additional assessment required thereunder
9 would provide. The scope and breadth of the investigation that is required by the Order will
10 require substantial monetary expenditures, despite any substantial evidence that there is a pressing
11 need for this additional analysis. Moreover, the costs associated with complying with the Order
12 will be further compounded by logistical problems in obtaining access to an adjacent property
13 whose owner has been uncooperative to date. These costs have no reasonable relationship to the
14 need for the investigation sought by the Regional Water Board or the benefits that could be
15 gained from such an investigation.

16 At great expense, and with the approval of the Regional Water Board, Environ completely
17 and successfully remediated the Site with a gas vapor extraction process. After the gas vapor
18 extraction was completed to the Regional Water Board’s satisfaction, the Site was monitored and
19 sampled extensively as instructed by the Regional Water Board. Eventually satisfied with the
20 results of the monitoring, the Regional Water Board authorized removal of the monitoring
21 equipment and the cessation of any further environmental related activities at the Site. The sole
22 remaining issue was whether the Regional Water Board would require a deed restriction. Yet
23 when the Site owner (Valley Alhambra) agreed to accept the restrictive required by the Regional
24 Water Board as a condition of closure, in January 2007, the Regional Water Board failed to issue
25 a closure; rather the Regional Water Board, with no new evidence and with no factual or legal
26 basis, decided to issue the Order instead, essentially re-opening the Site and requiring Petitioners
27 to start the investigation and remediation process all over again.

28 Complying with the Order will require the reinstallation of equipment that the Regional

1 Water Board allowed to be shutdown and removed and will require the re-performance of
2 sampling, analysis, reporting, and other work that has already been done and accepted by the
3 Regional Water Board. Yet the Regional Water Board has no new evidence or any evidence of
4 any change at the Site to justify re-doing what has already been done at an already remediated
5 Site.

6 As set forth in the accompanying Declaration of George Linkletter, the cost of complying
7 with the Order is conservatively estimated to be in excess of \$250,000.00. In light of the
8 investigation, remediation, and confirmation monitoring conducted to date, the burden placed on
9 Petitioner by the Order (including the monetary cost of compliance) does not bear a reasonable
10 relationship to the need for the reports and the benefits to be obtained from the reports requested
11 by the Regional Water Board.

12
13 **F. FAILURE TO ISSUE CLOSURE CAN RESULT IN SERIOUS FINANCIAL**
14 **HARDSHIP TO VALLEY ALHAMBRA SINCE IT CANNOT SELL ITS**
15 **REAL ESTATE FOR A COMPETITIVE PRICE**

16 Petitioner incorporates herein by reference the Joinder filed by Valley Alhambra and the
17 supporting Declaration of Gary J. Herman, Sr.

18
19 **IX. STATEMENT OF SERVICE OF PETITION TO THE REGIONAL WATER**
20 **BOARD**

21 A copy of this Request has been sent to the Regional Water Board.
22

23 **X. STATEMENT THAT THE SUBSTANTIVE ISSUES RAISED IN THE PETITION**
24 **HAVE BEEN RAISED BEFORE THE REGIONAL WATER BOARD**

25 Concurrently with the filing of this Petition, Petitioner will pursue reconsideration of the
26 Order by the Regional Water Board. Thus, Petitioner requests that this Petition be held in
27 abeyance pursuant to Title 23 of the California Code of Regulations, Section 2050.5(d), pending
28 further good faith discussions between Petitioner and the Regional Water Board.

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XI. REQUEST TO THE REGIONAL BOARD FOR PREPARATION OF THE RECORD

Prior to filing this Petition, Petitioner and Valley Alhambra, acting through their respective legal counsel, as well as Environ, made repeated efforts to obtain access to the Regional Water Board file relating to the Site. Copies of multiple written requests to the Regional Water Board for access to the Regional Water Board file are collectively attached hereto as **Exhibit B**. Despite their best efforts, however, Petitioner, Valley Alhambra, and Environ were unable to review the file prior to the filing of this Petition. Thus, Petitioner reserves the right to supplement this Petition at a later date after being granted an opportunity to review the Regional Water Board file.

Additionally, in furtherance of this Petition, Petitioner is requesting that the Regional Water Board prepare the record, including available tape recordings and transcripts, for the hearing on this Petition. A copy of Petitioner's request to the Regional Water Board for preparation of the record is attached hereto as **Exhibit C**. In light of the ongoing dialogue between Petitioner and the Regional Water Board, as well as Petitioner's request that this Petition be held in abeyance to allow further consideration of these matters by the Regional Water Board, Petitioner reserves the right to request that the Regional Water Board supplement the Regional Water Board record prepared pursuant to the attached request with additional and further information and documents submitted to or generated by the Regional Water Board following the preparation of the record by the Regional Water Board as requested by **Exhibit C** hereto. Moreover, pursuant to Water Code Section 13320(b) and Title 23 of the California Code of Regulations section 2050.6(a), Petitioner requests that the State Water Board supplement the record before it. Petitioner will advise the State Water Board more specifically in this regard once the Regional Water Board has prepared the record and Petitioner knows what matters have not been included.

XII. REQUEST FOR EVIDENTIARY HEARING

1 In accordance with Title 23 of the California Code of Regulations section 2050.6(b) and
2 2052(c), Petitioner respectfully requests that the State Water Board hold a hearing to consider this
3 Petition. At the hearing, Petitioner may present additional evidence that was not available to the
4 Regional Water Board at the time the Order was issued or when this Petition is submitted. In
5 addition, Petitioner requests permission at any hearing: (1) to present oral argument on the legal
6 and policy issues raised by this Petition; and (2) to present to the State Water Board factual and
7 technical information in the Regional Water Board's files which may have been overlooked by
8 the Regional Water Board.

9
10 **XIII. REQUEST FOR STAY**

11 In accordance with Title 23 of the California Code of Regulations section 2053(a),
12 Petitioner requests a stay of the Order. Compliance with the Order will cause substantial harm to
13 the Petitioner, including the cost of compliance with the Order, which will exceed \$250,000.00.
14 Moreover, in order to comply with the timelines established by the Order the bulk of these costs
15 will be incurred by Petitioner prior to a hearing on the Petition by the State Water Board unless a
16 stay is granted.¹

17 By contrast, there will be no substantial harm to the public interest or other interested
18 parties if a stay is granted because investigation, remediation, and confirmation monitoring, as
19 well as a prior risk assessment, confirm that the current conditions at the Site do not pose a
20 significant risk to human health or the environment. To the contrary, the Regional Water Board
21 has previously indicated that the Site was ready for closure.

22 Finally, there exist substantial questions of fact and law regarding the propriety of the
23 Regional Water Board's Order, including, *inter alia*, Leggett & Platt's contention that the
24 Regional Water Board is without authority to issue a Section 13267 Order against Leggett & Platt
25 except in Leggett & Platt's capacity as administrator of the settlement fund, and Petitioner's
26 contention that the cost of compliance with the Order does not bear a reasonable relationship to

27
28 ¹ Alternatively, Petitioner may be placed in the position of having to incur substantial fines or
penalties for failing to comply with the Regional Water Board Order pending a hearing on their
Petition.

1 the need for the reports and the benefits to be obtained from the reports requested by the Regional
2 Water Board.

3 Based upon these reasons, as well as the other contentions set forth in this Petition,
4 Petitioner requests a stay of the Order pursuant to Title 23 of the California Code of Regulations
5 section 2053(a). Petitioner has attached to this Petition the Declaration of Dr. George Linkletter
6 setting forth proof of the facts alleged in support of its request for stay and, further, requests a
7 hearing on its request for stay to present further relevant evidence and arguments.

8

9 **XIV. REQUEST THAT PETITION BE HELD IN ABEYANCE**

10 Petitioner requests that the State Water Board hold this Petition in abeyance pursuant to
11 Title 23 of the California Code of Regulations, Section 2050(d) or 2050.5(d), pending further
12 good faith discussions between Petitioner and the Regional Water Board. Petitioner requests that
13 the State Water Board hold this Petition in abeyance for the maximum time period permitted or
14 until reactivated by Petitioner. Petitioner will promptly notice the State Water Board when it is
15 ready to reactivate and have its Petition considered. Petitioner reserves the right to supplement
16 this Petition if the State Water Board does not grant Petitioner's request for abeyance or should
17 the Petition be reactivated in the future.

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1 **XV. CONCLUSION**

2 For the foregoing reasons, Petitioner respectfully submits that the issuance of the Order
3 was improper, inappropriate, unlawful, and not supported by substantial evidence. Petitioner
4 respectfully requests that the State Water Board grant this Petition and review the Regional Water
5 Board's action in issuing the Order. However, until such time that Petitioner requests the State
6 Water Board to reactivate this Petition, Petitioner requests that the State Water Board hold this
7 Petition in abeyance.

8

9 DATED: July 10, 2008

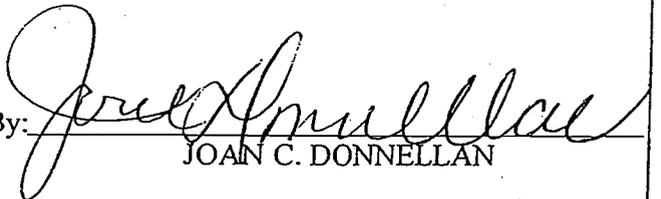
PARKER, MILLIKEN, CLARK, O'HARA &
SAMUELIAN
A Professional Corporation

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By: 
JOAN C. DONNELLAN

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Attorneys for Petitioner
Leggett & Platt, Incorporated

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Exhibit A



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger
Governor

June 11, 2008

Mr. Robert Anderson
Leggett and Platt, Inc.
One Leggett Road
Carthage, MO 64836

CALIFORNIA WATER CODE (CWC) SECTION 13267 ORDER: REQUIRING SUBMITTAL OF A WORK PLAN FOR ADDITIONAL SOIL GAS AND GROUNDWATER INVESTIGATION – VALLEY ALHAMBRA PROPERTY, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA (SLIC NO. 0967, SITE ID 204DJ00)

Dear Mr. Anderson:

Los Angeles Regional Water Quality Control Board (Regional Board) staff has completed a review of the case file for the subject site. Based on the information provided to us, we have determined that the site is not eligible for closure of soil and/or groundwater at this time. The Regional Board is issuing this letter to require submittal of a work plan for additional investigation of soil gas and groundwater at the site.

Background

The site operated as a service station from at least 1920 until 1953 and subsequently was used by a variety of private companies. In 1953, three 500 gallon underground storage tanks (USTs) and three 1,000 gallon USTs were removed. In 1969, the Green Mountain Paper Company received a permit to install one 2,000 gallon UST. From January 1972 to January 1993, the site was occupied by Harris Hub/Contract Metal Fabricators/Dresher, Inc. In 1990, Leggett and Platt purchased the business and continued the operation. Activities at the site included painting and assembling metal bed frames. As part of the painting process, two dip tanks and three 750 gallon USTs were used to contain or store solvents. The three 750 gallon USTs were removed from the site in 1991, under the direction of the City of Los Angeles Fire Department (Fire Department). Several subsurface investigations were conducted at the site between 1991 and 1993 as required by the Fire Department for closure of the facility. These investigations are described in the report *Response to Request for Subsurface Site Assessment Work Plan* dated April 30, 2001.

In March 1999 and June 2001, additional soil investigations were completed at the site. Based on boring logs completed at the site during the installation of five groundwater monitoring wells in 1999, lithology in the upper 25 feet of soil consists of sands, clayey sands, and clays. The soil investigations indicated that volatile organic compounds (VOCs), including tetrachloroethene (PCE), trichloroethene (TCE), toluene, ethylbenzene, and xylenes were present beneath the footprints of the

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former dip tanks and USTs at approximately 8 to 10 feet below ground surface (bgs). Soil samples from beneath these tanks contained PCE at concentrations of up to 5,300 milligrams per kilogram (mg/kg), TCE at concentrations of up to 10 mg/kg, toluene at concentrations of up to 540 mg/kg, ethylbenzene at concentrations of up to 76 mg/kg, and xylenes at concentrations of up to 360 mg/kg. Soil samples also contained gasoline-range total petroleum hydrocarbons (TPH) at concentrations of up to 4,590 mg/kg. Analysis of soil samples for metals indicated concentrations consistent with background levels found in Southern California soils.

Soil-gas samples were collected in January 1999, at 15 locations from 5, 10, and 15 feet bgs, with the exception of two locations where the maximum achievable depth was 10 feet bgs. PCE was detected in soil gas in the upper 15 feet of soil at the site at concentrations up to 620 micrograms per liter ($\mu\text{g/L}$). TCE was only detected in two borings at much lower concentrations.

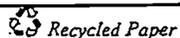
In May 1999, five groundwater monitoring wells (MW-1 through MW-5) were installed. These wells were first sampled in second quarter 1999 and showed moderate to high concentrations of VOCs. A quarterly groundwater monitoring program was initiated at the site in February 2001. The highest concentrations of VOCs in groundwater were detected during the second quarter sampling event completed in May 2001. During this sampling event, elevated concentrations of PCE were detected in wells MW-2 and MW-3 at 4,800 micrograms per liter ($\mu\text{g/L}$) and 4,100 $\mu\text{g/L}$, respectively. TCE and cis-1,2-DCE were also detected during this event, however at much lower concentrations. Groundwater was encountered during the installation of monitoring wells MW-1 through MW-5 between approximately 15 and 17 feet bgs.

Remediation of soil and groundwater began in December 2001, with the implementation of a dual-phase extraction system. The extraction system operated from December 2001 through October 2002 and removed approximately 107 pounds of VOCs from the site. After the remediation system was turned off, five additional quarters of groundwater sampling were performed to test for rebound and to verify residual contamination levels in groundwater. VOCs concentrations (PCE, TCE, and cis-1,2-DCE) in groundwater had decreased or remained generally stable after system shut down. Based on the latest groundwater sampling event in December 2003, VOCs remain in groundwater beneath the site with concentrations up to 26 $\mu\text{g/L}$ of PCE, 19 $\mu\text{g/L}$ of TCE, and 89 $\mu\text{g/L}$ of cis-1,2-DCE.

Confirmation soil matrix sampling was conducted at the site in December 2003 and January 2004 at locations adjacent to the former dip tanks and USTs. Analytical results indicated that PCE was found in six of the nine samples with a maximum concentration of 140 micrograms per kilogram ($\mu\text{g/kg}$) at 10 feet bgs (decreasing to 37 $\mu\text{g/kg}$ at 12 feet bgs). Other VOCs detected included toluene at up to 320 $\mu\text{g/kg}$, ethylbenzene up to 19 $\mu\text{g/kg}$, and xylenes up to 108 $\mu\text{g/kg}$. No other VOCs were detected above the laboratory reporting limits during this soil sampling event.

The consultant for the site, Environ International Corporation (Environ), prepared a *Risk Assessment of Potential Migration of Volatile Organic Compounds to Indoor Air* (Risk Assessment) dated November 28, 2005. The Office of Environmental Health Hazard Assessment (OEHHA) reviewed the Risk Assessment and provided comments to Regional Board staff in a memo dated April 17,

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Mr. Robert Anderson
Valley Alhambra Property

- 3 -

June 11, 2008

2006. OEHHA indicated that the lack of post-remediation soil-gas sampling could represent a limitation in the Risk Assessment as all modeling was based on soil matrix and groundwater data.

Comments and Requirements

After reviewing historic groundwater monitoring, dual-phase extraction, and confirmation sampling reports, as well as the Risk Assessment and other file documents, Regional Board staff has the following comments and requirements:

1. You are required to submit a conceptual site model (CSM), using existing and new data, to identify any data gaps for delineating the soil vapor plume and impacted groundwater on and offsite. This CSM is due to the Regional Board by **August 19, 2008**, and may be included with the required work plan(s) for additional investigation of soil-gas and groundwater (see below).
2. Additional groundwater data is needed to properly evaluate the lateral and vertical extent of groundwater contamination. Although groundwater data collected from the on-site monitoring wells indicate concentrations of chlorinated VOCs contamination in groundwater have been significantly reduced, the upgradient, cross-gradient, and downgradient extent of this contamination has not been defined to non-detect levels. Therefore, you are required to fully define the vertical and lateral extent of groundwater contamination originating from the site. However, prior to construction of additional groundwater monitoring wells you are required to conduct an investigation of the physical properties of the saturated zone (including laboratory sieve analysis of soil matrix samples) and collect discrete vertical groundwater samples. Investigation of the saturated zone must include continuous coring until a competent clay boundary with a minimum thickness of 5 feet is encountered. Discrete groundwater samples should be collected from water bearing zones or at a minimum of every 10 feet if the lithology appears consistent over a large depth interval. Based on this information, additional groundwater monitoring wells can be constructed to give the most useful data for evaluation of impact to groundwater beneath the site, which may require the installation of multi-depth nested or cluster wells on and offsite. You are required to submit a work plan to define the lateral and vertical extent of contamination in groundwater by **August 19, 2008**.
3. Based on comments received from OEHHA dated April 17, 2006 (copy attached), you are required to perform a post-remedial soil-gas investigation and complete a vapor intrusion evaluation for the site. The work plan for the soil-gas investigation may be included with the work plan for the lateral and vertical delineation of contaminated groundwater due to the Regional Board by **August 19, 2008**. The completed vapor intrusion evaluation is due to the Regional Board by **December 19, 2008**. The following document can be referenced for the site-specific vapor intrusion evaluation: "Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air", dated December 15, 2004 (revised February 7, 2005), prepared by the Department of Toxic Substances Control.

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Mr. Robert Anderson
Valley Alhambra Property

- 4 -

June 11, 2008

4. Groundwater monitoring is not being conducted at the site. You must resume monitoring of the existing and new groundwater wells at the site according to the following semi-annual schedule:

<u>Report Period</u>	<u>Report Due Date</u>
January – June	July 31 st
July – December	January 31 st

In addition to the information provided in the previous monitoring reports, all future groundwater monitoring reports shall include the following:

- Isoconcentration map(s) for contaminants of concern in groundwater at the site.
- A table detailing the construction of all existing (and planned) groundwater monitoring wells at the site.
- Cross-section figures showing the extent of dissolved-phase contamination in the saturated zone along the groundwater flow direction and perpendicular to groundwater flow direction.

You are required to resume groundwater monitoring at the site with the July through December 2008 groundwater monitoring report due to the Regional Board no later than January 31, 2009.

5. A Health and Safety Plan for the required work must be submitted to the Regional Board prior to initiating any fieldwork. You may include the Health and Safety Plan in the required work plan(s) as an appendix.
6. Please note that effective July 1, 2005, all reports submitted to the Regional Board must comply with the electronic submittal of information (ESI) to be submitted over the internet, including, groundwater monitoring reports, soil and/or groundwater investigation/characterization reports, remedial action plans, requests for closure, and portable data format (PDF). 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](http://www.waterboards.ca.gov/ust/cleanup/electronic%20reporting/docs/final%20electronic%20regs%20dec04.pdf)

Additionally, the State Water Board Geotracker data management system is capable of accepting this electronic information. The Regional Board does not have the resources to acquire hardware to allow caseworkers to appropriately review documents in electronic form. Therefore, for the foreseeable future, we request that you continue to submit hard copies of all documents and data submittals, in addition to ESI to Geotracker.

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Mr. Robert Anderson
Valley Alhambra Property

- 5 -

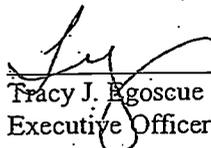
June 11, 2008

Pursuant to section 13267 of the CWC, you are required to submit a conceptual site model and a work plan for additional soil-gas-and-groundwater investigation on and offsite by August 19, 2008, a vapor intrusion evaluation by December 19, 2008, and to resume groundwater monitoring and reporting according to the schedule specified in item 4 (above), with the first semi-annual groundwater monitoring report due by January 31, 2009. A Health and Safety Plan for the proposed work must be submitted to the Regional Board prior to initiating any fieldwork. You may include the Health and Safety Plan with the required work plan as an appendix.

Pursuant to section 13268 of the CWC, failure to submit the required technical reports by their due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1000) for each day the technical report or document is not received.

If you have any questions, please feel free to contact Mr. David Young at (213) 576-6733 or Ms. Su Han at (213) 576-6735.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosure: Memorandum from OEHHA dated April 17, 2006

Cc: Ms. Jennifer Fordyce, Office of Chief Counsel
Ms. Linda Northrup, Northrup Schlueter
Mr. Gary Herman, S.D. Herman Co.
Ms. Joan Donnellan, Leland, Parachini, Steinberg, Matzger & Melnick, LLP
Dr. George Linkletter, Environ
Mr. Eddie Arslanian, Environ
Ms. Seema Sutarwala, Environ

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Office of Environmental Health Hazard Assessment

10 1



Dan Skopec
Acting Agency Secretary

Joan E. Denton, Ph.D., Director
Headquarters • 1001 I Street • Sacramento, California 95814
Mailing Address: P.O. Box 4010 • Sacramento, California 95812-4010
Oakland Office • Mailing Address: 1515 Clay Street, 16th Floor • Oakland, California 94612



Arnold Schwarzenegger
Governor

MEMORANDUM

TO: David A. Young
Los Angeles Region IV
California Regional Water Quality Control Board
320 W. 4th Street, 1st Floor
Los Angeles, California 90013

FROM: Hristo Hristov, MD, Ph.D., M.Env.Sc.
Integrated Risk Assessment Branch
Office of Environmental Health Hazard Assessment
1001 I Street, 12th Floor
Sacramento, California 95814

DATE: April 17, 2006

SUBJECT: RISK ASSESSMENT OF POTENTIAL MIGRATION OF VOLATILE ORGANIC COMPOUNDS TO INDOOR AIR, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA, AND RESPONSE TO OEHHA REVIEW OF "RISK ASSESSMENT OF POTENTIAL MIGRATION OF VOLATILE ORGANIC COMPOUNDS TO INDOOR AIR, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA"
SWRCB #R4-05-10

OEHHA # 880118-01

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CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Document Reviewed

(Italicized text is quoted from the report.)

The Integrated Risk Assessment Branch of the Office of Environmental Health hazard Assessment (OEHHA) reviewed the document entitled "*Risk Assessment Of Potential Migration Of Volatile Organic Compounds To Indoor Air, 4900 Valley Boulevard, Los Angeles, California*", prepared by Environ to provide comments or approval. In addition, a letter entitled "*Response to OEHHA review of Risk Assessment Of Potential Migration Of Volatile Organic Compounds To Indoor Air, 4900 Valley Boulevard, Los Angeles, California*" was received on March 29, 2006 and considered in the preparation of this memorandum. The letter was prepared to address some initial OEHHA's concerns intended to the attention of the Los Angeles Water Resource Quality Control Board (LA RWQCB) site manager.

California Environmental Protection Agency

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Scope of the Review

The documents were reviewed for scientific and regulatory issues related to the risk assessment process applied "to obtain an *unrestricted use* condition for the Site from the California Regional Water Quality Control Board - Los Angeles...." The review was intended to verify the obtained results, elaborate on their analysis, and evaluate the conclusions made by the consultant. Only typographical errors reflecting the scientific integrity and the text interpretation were noted.

Limitations

The Report Format and Content - This short report is limited to the development of risk-based concentrations (RBCs) developed to protect residents potentially occupying the site from inhalation of vapors migrating from contaminated soil and groundwater.

Site Characterization - No site characterization section was found in the provided report. Environ provided (through the LA RWQCB) a set of documents, namely "Fourth Quarter 2003 Ground Water Monitoring report and Confirmation Soil Sampling, 4900 East Valley Boulevard, Los Angeles, California", and "Workplan for Confirmation Soil Sampling and Final Round of Ground Water Sampling, 4900 East Valley Boulevard, Valley Alhambra Property, Los Angeles, California" as part of the Response to OEHHA review letter on March 29, 2006. However, OEHHA was not authorized to review these documents. An accurate estimate of risk from contamination at a site depends on chemical concentrations that reflected the contamination at the site. This requires samples of soil, soil-gas and water to be analyzed for toxic chemicals that are likely to be in the samples. Furthermore, the sample locations must represent the site as a whole or at least not avoid significant contamination. Finally, samples must be handled in such a way that chemical is not lost before the analysis can take place. Due to their proximity to and familiarity with sites, Regional Water Quality Control Board (RWQCB) staff can better determine the sampling locations, sample handling and needed for chemical analysis. Therefore, OEHHA based its analysis on the assumption that the sampling and analysis are comprehensive, representative, and accurate for this site and that all data used in the Risk Assessment are correct and representative of the data shown in the ground water monitoring and confirmation soil sampling report.

Type of Data Used - All modeling is based on soil matrix and groundwater data. CalEPA and US EPA recommend the use of soil-gas data to decrease the uncertainty related to contaminant partitioning among the three soil matrix phases. According to the Environ "Response to OEHHA review of "Risk Assessment of Potential Migration..." letter sent on

March 29, 2006 "no soil-gas sampling was performed following the remediation because of the low concentrations remaining in soil and ground water." This could represent a limitation in the assessment.

Site Background

No Site Background Information was found within the provided risk assessment report and within the documents sent on March 29, 2006.

General Comments

Completeness of the Risk Assessment – The LA RWQCB requested OEHHA to review the risk estimation under residential and construction scenarios, soil ingestion and contact pathways, and migration of vapors originating from soil and ground water. Some initial comments provided by OEHHA to the LA RWQCB resulted in Environ's "Response to OEHHA review of "Risk Assessment of Potential Migration..." letter sent on March 29, 2006 to OEHHA. A Site Conceptual Model (SCM) figure attached to this letter shows a number of complete exposure pathways, including soil ingestion and dermal contact with soil. However, according to the text (response 1) all pathways except vapor migration indoors have been eliminated as incomplete without further explanation. The elimination of potentially relevant pathways should be discussed in the report. OEHHA agrees that risk estimation under residential scenario provides more conservative risk estimates than typical risk estimation under industrial or commercial scenarios. However, this does not apply to the construction worker scenario. Without further explanation, OEHHA cannot support the elimination of pathways under the residential and construction scenarios.

Groundwater Contamination of Concern – According to the SCM, "ground water at the site is not in a water supply aquifer and too deep for dermal contact". The following table compares the maximum groundwater concentrations to current drinking water Public Health Goals.

Chemical	Maximum Groundwater Concentration ($\mu\text{g/L}$)	Public Health Goal ($\mu\text{g/L}$)
Tetrachloroethylene (PCE)*	26	0.06
Trichloroethylene (TCE)*	19	0.8
cis-1,2-Dichloroethylene	89	100

* carcinogen

David A. Young
April, 17, 2006
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Based on Table 5 showing parameters used in the vapor migration modeling, it appears that the ground water is located 13 feet below ground surface (ft bgs). The location of the closest drinking water wells is not shown in the report. OEHHA is not in a position to assess the appropriateness of the Environ's conclusion that ground water does not need to be protected as a drinking water source.

Evaluation of Ecological Impact -- no discussion of the potential of ecological impact was found in the report.

Soil and Ground Water Vapor Migration to Indoor Air

The following issues were identified in the provided documents:

1. According to p. 3 of the report tetrachloroethylene (PCE) was identified at two separate depth strata from approximately 2 to 7 feet below ground surface (bgs) and from 10 to 13 ft bgs. All PCE modeling and risk calculations are based on this depth contamination assumption. The soil interval between 7.3 and 10 ft bgs was not sampled. Environ should have assumed that the PCE contamination starts at 7.3 and extends to 13 ft bgs to avoid modeling underestimation of the risk and hazard.

2. Although the report's Table 5 shows the parameters used in the vapor intrusion modeling (from soil and ground water), modeling spreadsheets were not provided within the report. Later, Environ provided example spreadsheets for PCE in soil and refined PCE modeling for one of the three groups of groundwater wells only, as part of its "Response to OEHHA comments..." letter. Thus I was unable to verify the modeling calculations.

- Two soil strata, namely A and B are shown in the soil modeling section in Table 5. This subdivision is unnecessary and confusing because both strata are sand extending to the groundwater table, and the Johnson & Ettinger model allows assigning strata for the depth interval above the top of contamination not below the top of contamination. However, the spreadsheet provided later shows that the modeling was performed correctly. Accordingly, this comment refers to the presentation in Table 5 only.

- Table 5 shows three groups of groundwater well locations differing by the different type of soil, respectively soil properties, soil thickness, and contaminant concentrations. The provided spreadsheet shows an example of refined groundwater PCE modeling at one of the groups only. This way it was impossible to understand whether the modeling results are representative of the locations showing the highest vapor migration, and respectively risk and hazard.

David A. Young
April, 17, 2006
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3. The report does not show the cumulative hazard resulting from inhalation of vapors originating in soil and ground water.

4. Table 6 of the report show some RBC calculation errors which were corrected in the revised Table 6 attached to the letter (except for ethylbenzene which RBC should be $2.32 \text{ E}+02 \mu\text{g}/\text{kg}$).

Based on the above, OEHHA independently remodeled the RBCs and estimated the cumulative risk and hazard. While the total incremental lifetime cancer risk resulted in the low 10^{-5} range, the total hazard index resulted about 0.2 which is even below the recommended acceptable one of 1.0. The obtained RBC and risk values resulted to be close to the ones generated by the consultant.

Conclusions

My review of the presented Risk Assessment Of Potential Migration Of Volatile Organic Compounds To Indoor Air confirmed the consultant conclusions.

The following issues are presented for your consideration:

1. The assessment was limited to the indoor air pathway for residents. It did not evaluate all complete pathways under residential and construction worker scenarios.
2. The potential ecological impact was not discussed.
3. Groundwater was not considered a source or potential source of drinking water. No supportive arguments were found in the provided documents.
4. The methods and parameters for evaluating the vapor migration pathway were not clear in the original report. Although, this was eventually clarified by Environ's subsequent letter and my own recalculation, this letter is not part of the report. An amendment to the report may help in this regard.
5. Additivity was not considered for non-carcinogens, although my calculations demonstrated acceptable total hazard index.
6. The acceptability of the calculated total cancer risk is a risk management decision and the possibility of use restriction or mitigation should be determined by the LA RWQCB.

Please do not hesitate to contact me at (916) 322-8364 or by e-mail at, hristov@oehha.ca.gov, if you have any questions related to this review.

Reviewed by:

Jim C. Carlisle, D.V.M., M.Sc., Senior Toxicologist

Exhibit B

PARKER MILLIKEN

PARKER, MILLIKEN, CLARK, O'HARA, SAMUELIAN
A PROFESSIONAL CORPORATION

Direct Dial: (213) 683-6638
E-mail: JDONNELLAN@PMCOS.COM

JOAN C. DONNELLAN

June 27, 2008

Via Hand Delivery & Facsimile

Fax No. (213) 576-6640

David Young

California Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: 4900 Valley Alhambra Blvd Site, (SLIC No 0967, Site ID 204DJ00)

Dear Mr. Young:

Leggett & Platt Incorporated hereby requests that the file containing all documentation relied on by the Board in the above referenced matter be made available for inspection and copying no later than July 2, 2008 to assist both Valley Alhambra and Leggett & Platt Incorporated to evaluate the filing of a Petition for Reconsideration of the order issued in the June 11th 2008 letter pursuant to California Water Code Section 13267 and a Petition for Review and Abeyance with the State Water Board under California Water Code Section 13320.

Because State Water Board Counsel has advised us that the petitions must be filed by July 11, 2008, we request an expedited response to avoid further prejudice to our client.

Leggett & Platt Incorporated makes this request exclusively in its role as administrator of the cap fund established by the settlement agreement between Valley Alhambra and Leggett & Platt Incorporated and does not admit liability for the condition of the above referenced site.

Please contact Eddie Arslanian at Environ to arrange the date for inspection and copying.

Very Truly Yours,



Joan C. Donnellan
PARKER, MILLIKEN, CLARK,
O'HARA & SAMUELIAN

4009-700 (329848)

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fx: 818.707.2675
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June 27, 2008

Via U.S. Mail & Facsimile

(213) 576-6640

Mr. David Young

California Regional Water Quality Control Board

320 West Fourth Street, Suite 200

Los Angeles, California 90013

Re: 4900 Valley Alhambra Blvd. Site, (SLIC No 0967, Site ID 204DJ00)

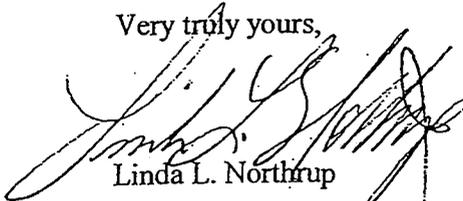
Dear Mr. Young:

My firm represents Valley Alhambra Properties, the owner of the above referenced property. We are in receipt of a recent order issued by the State Water Board with reference to this property. On behalf of our client, we hereby request that the file containing all documentation relied on and generated by the Board in the above referenced matter be made available for inspection and copying no later than July 2, 2008 to assist us and our consultants in evaluating the recent order in the context of the entire site history and to evaluate and, if necessary, file a Petition for Reconsideration of the order issued in the June 11, 2008 letter pursuant to California Water Code Section 13267 and a Petition for Review and Abeyance with the State Water Board under California Water Code Section 13320.

Because State Water Board Counsel has advised us that any such petitions must be filed by July 11, 2008, we request an expedited response to this request to avoid prejudice to our client in this matter.

Please contact Eddie Arslanian at Environ as soon as possible to arrange a date for inspection and copying. Should you have any questions or need further information to process this request, please do not hesitate to contact me.

Very truly yours,



Linda L. Northrup

LLN/

Mr. David Young
June 27, 2008
Page 2

cc: Joan C. Donnellan, Esq. (by U.S. Mail)
Mr. Gary J. Herman, Sr. (by U.S. Mail)
Mr. Eddie Arslanian (by U.S. Mail)
Mr. George Linkletter (by U.S. Mail)
Ms. Sue Hahn (by U.S. Mail and Facsimile)

FACSIMILE COVER LETTER

Date: July 7, 2008
To: UST File Review
Company: LARWQCB
Fax No.: 213-576-6707
From: Eddie Arslanian
Company: ENVIRON
Fax No.: (213) 943-6301
Project No.:
Total # of Pages: 1 (including cover page)

Message:

In anticipation of a filing of a "Petition for Reconsideration" by this Friday, July 11, ENVIRON requests to review files this week for the Valley Alhambra Property, 4900 Valley Boulevard, Los Angeles, California (Underground Storage Tank ID No. 900320052). The site also has a SLIC listing (SLIC No. 0967) and we have made a separate request for that file under the SLIC program. Please coordinate with Mr. David Young, the case officer under the SLIC listing, to expedite this process.

Please call me at 213-943-6326 to set up an appointment. Thank you.

copy: Mr. David Young, Los Angeles Regional Water Quality Control Board
Ms. Su Han, Los Angeles Regional Water Quality Control Board

FACSIMILE COVER LETTER

Date: July 7, 2008

To: SLIC File Review Request

From: Eddie Arslanian

Company: LARWQCB

Company: ENVIRON

Fax No.: 213-576-6717

Fax No.: (213) 943-6301

Project No.: SLIC No. 0967

Total # of Pages: 1 (including cover page)

Message:

In anticipation of a filing of a "Petition for Reconsideration" by this Friday, July 11, ENVIRON requests to review files this week for the Valley Alhambra Property, 4900 Valley Boulevard, Los Angeles, California (SLIC No. 0967). Please coordinate with Mr. David Young, the case officer, to expedite this process.

Please call me at 213-943-6326 to set up an appointment. Thank you.

copy: Mr. David Young, Los Angeles Regional Water Quality Control Board
Ms. Su Han, Los Angeles Regional Water Quality Control Board

Exhibit C

PARKER MILLIKEN

PARKER, MILLIKEN, CLARK, O'HARA, SAMUELIAN
A PROFESSIONAL CORPORATION

Direct Dial: (213) 683-6686
E-mail: PMAZGANI@PMCOS.COM

PEDRAM MAZGANI

July 10, 2008

Via U.S. Mail & Facsimile [(213) 576-6640]

Attn: David Young
California Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: 4900 Valley Alhambra Blvd Site, (SLIC No 0967, Site ID 204DJ00)

Dear Mr. Young:

On July 10, 2008, Leggett & Platt Incorporated filed a Petition with the State Water Resources Control Board pursuant to Water Code Section 13320 for review of the California Regional Water Quality Control Board, Los Angeles Region's Section 13267 Order issued to Leggett & Platt Incorporated on June 11, 2008. Pursuant to Title 23 of the California Code of Regulations, Section 2050.5(a) you are requested to file the administrative record, including available tape recordings and transcripts, if any, with the State Water Resources Control Board within thirty (30) days.

Please contact me if you have any questions.

Very Truly Yours,



Pedram Mazgani
PARKER, MILLIKEN, CLARK,
O'HARA & SAMUELIAN

cc: Ms. Linda Northrup (via facsimile)
Mr. Gordon Billehimer (via facsimile)
Mr. Eddie Arslanian (via facsimile)
Mr. George Linkletter (via facsimile)
Ms. Sue Hahn (via hand delivery)

4009-700 (330435)

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EXHIBIT C

1 Joan C. Donnellan SBN 79462
Gary A. Meyer SBN 94144
2 Pedram F. Mazgani SBN 204808
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3 A Professional Corporation
555 S. Flower St., 30th Floor
4 Los Angeles, California 90071-2440
Telephone: (213) 683-6500
5 Facsimile: (213) 683-6669

6 Attorneys for Petitioner
Leggett & Platt, Incorporated
7



8 STATE OF CALIFORNIA
9 STATE WATER RESOURCES CONTROL BOARD

10
11 IN THE MATTER OF THE PETITION
OF LEGGETT & PLATT,
12 INCORPORATED, FOR REVIEW OF
WATER CODE SECTION 13267
13 ORDER DATED JUNE 11, 2008, BY
THE CALIFORNIA REGIONAL
14 WATER QUALITY CONTROL BOARD,
LOS ANGELES REGION,
15

Petition No. _____

DECLARATION OF GEORGE LINKLETTER IN
SUPPORT OF PETITION FOR REVIEW
PURSUANT TO WATER CODE SECTION
13320 AND 23 C.C.R. SECTION §2050 ET SEQ.
[Request To Be Held In Abeyance Under 23
C.C.R. §2050.5(d)] and STAY OF ORDER

16
17 I, GEORGE O. LINKLETTER, declare as follows:

18 1. I declare under penalty of perjury that I am a Principal and Senior Vice President
19 of ENVIRON and have served as the Principal-in-Charge of investigation, evaluation and
20 remediating the PCE/TCE contamination at 4900 East Valley Boulevard, Los Angeles California
21 ("Site").

22 2. I have both A.B. and A.M. degrees in Geology from Dartmouth College, and a
23 Ph.D. in Geology from the University of Washington. I am a Professional Geologist in the State
24 of California with over 35 years of experience, including extensive experience in investigating
25 suspected contamination, characterizing contaminated sites and developing and successfully
26 implementing remedial programs. A copy of my curriculum vitae is attached hereto as Exhibit A.

27 3. My experience extends to all types of industrial contaminants in soil and ground
28 water, including PCE/TCE, in both rural and urban settings.

PARKER MILLIKEN
CLARK O'HARA &
SAMUELIAN, A
PROFESSIONAL
CORPORATION

1 4. ENVIRON was engaged by Leggett & Platt Incorporated in 1998 as a consultant,
2 to evaluate claims of contamination alleged in a complaint filed by Valley Alhambra, the Site
3 owner, against Leggett & Platt Incorporated, Dresher, Inc., and alleged prior tenants at the Site.
4 ENVIRON's evaluation was based on data reflected in reports filed with the California Regional
5 Water Quality Control Board -Los Angeles Region ("Regional Water Board") by RMT
6 Environmental in 1992 and 1993 in connection with the excavation and remediation of soil
7 adjacent to a former paint dip tank system, which was removed by RMT. We also reviewed
8 reports filed with the Regional Board in 1993 and 1994 by CLT Engineering Services, Valley
9 Alhambra's consultant, in connection with an investigation of the Site and reflecting the presence
10 of PCE and TCE in the subsurface adjacent to the paint tanks.

11 5. As a condition of the settlement of the litigation in 2000, Valley Alhambra and
12 Dresher Inc./Leggett & Platt, engaged ENVIRON to investigate and remediate the PCE/TCE
13 contamination reflected on the "Investigation Results Report" dated December 9, 1999 in
14 accordance with the terms of the Settlement Agreement between Valley Alhambra, Dresher, Inc.
15 and Leggett & Platt Incorporated.

16 6. The Regional Water Board issued a letter dated January 17, 2001 requiring a
17 Subsurface Site Assessment Work Plan. In that letter, the Regional Water Board requested
18 information regarding site use history and previous environmental investigations conducted at the
19 site.

20 7. Early in the investigation process, the Regional Water Board requested that
21 ENVIRON submit a work plan to identify the migration of contaminants off site on the property
22 located at 4880 East Valley Boulevard, west of the Site. In response, ENVIRON submitted the
23 "Work Plan for Off-Site HydroPunch and Bedrock Identification" dated February 22, 2001,
24 affecting the adjacent property owned at that time by the Corradini Corporation.

25 8. On April 30, 2001, ENVIRON submitted to the Regional Water Board its
26 "Response to Request for Subsurface Site Assessment Work Plan." ENVIRON's April 30, 2001
27 submittal addressed certain issues raised by the Regional Water Board in its letter dated January
28 17, 2001.

1 9. The historical uses of the site and prior environmental investigations, including
2 remediation efforts, were documented in Attachment C to ENVIRON's April 30, 2001 submittal.
3 Contrary to the statement in the June 11, 2008 Order from the Regional Water Board, the "dip
4 tanks" and underground storage tanks used in the bed frame assembly process were used to store
5 paints, not solvents, as reflected in reports filed with the Regional Board.

6 10. Documentation on the site geology/hydrogeology, including several regional maps
7 show the site to be located on shallow alluvial deposits, which lie above a non-waterbearing
8 formation. Based on ENVIRON's site investigation, including generally the stratigraphy
9 interpreted from boring logs and specifically two borings in which no ground water was
10 encountered in the southern portion of the site, the water-bearing strata at the site were confirmed
11 to be locally variable.

12 11. Research into ground water supply wells showed that there are no public supply or
13 privately owned wells within a one-mile radius of the Site.

14 12. Initially, the Regional Water Board approved the work plan and its addendum in a
15 letter dated April 18, 2001. However, the work plan was not implemented due to inability to gain
16 access to the Corradini property in spite of the efforts of ENVIRON, various attorneys, and the
17 Regional Water Board itself (letter dated June 5, 2001; see Exhibit B). The Regional Water
18 Board made no further demands to characterize the migration of contaminants off site.

19 13. On June 5, 2001, the Regional Water Board issued a letter regarding ENVIRON's
20 "Response to Request for a Subsurface Site Assessment Work Plan," dated April 30, 2001. In
21 that letter, the Regional Water Board required that a work plan be submitted to delineate soil
22 contamination west of the recognized source area. On June 20, 2001, ENVIRON submitted a
23 "Work Plan to Delineate Soil West of Suspected Source Area," which involved advancing two
24 soil borings (SB-1 and SB-2) along the western property boundary. This work was completed on
25 June 22, 2001 and an update was provided to the Regional Water Board in ENVIRON's "Status
26 of Project" letter dated October 31, 2001. The analytical laboratory reports of the soil samples
27 and a figure depicting the locations of the two soil borings (SB-1 and SB-2) are collectively
28 attached hereto as Exhibit C. Notably, SB-1 and SB-2 were advanced to the depth of the capillary

1 fringe, just above the water table. The results from the deepest samples were judged reflective of
2 ground water conditions and demonstrated only low or nondetectable concentrations of
3 contaminants at the western boundary of the Site, adjacent to 4880 East Valley Boulevard.

4 14. On April 30, 2001, ENVIRON submitted an "Interim Remedial Action Plan"
5 (IRAP) to address subsurface volatile organic compounds (VOCs). The Regional Water Board
6 authorized the implementation of the work on June 8, 2001. The remediation system, consisting
7 of 2-PHASE soil vapor and ground water extraction, began operating on December 6, 2001.
8 Following an October 8, 2002 on-site meeting with representatives from ENVIRON (George
9 Linkletter, Eddie Arslanian, and Bita Tabatabai) and the Regional Water Board (David Young
10 and J.T. Liu), the Regional Water Board authorized ENVIRON to shut down the remediation
11 system in order to evaluate possible rebound of VOCs in ground water. On October 15, 2002,
12 ENVIRON submitted to the Regional Water Board a "Request for Post-Remediation Monitoring"
13 documenting the outcome of the October 8, 2002 meeting (see Exhibit D).

14 15. Following the agreed upon number of post-remediation ground water monitoring
15 events, a meeting was held on November 18, 2003 between representatives from ENVIRON
16 (George Linkletter, Bita Tabatabai, and Eddie Arslanian) and the Regional Water Board (David
17 Young and J.T. Liu) to discuss the data from the post-remediation ground water monitoring and
18 protocols for confirmation soil sampling and a final round of ground water monitoring as a
19 prelude to site closure (No Further Action [NFA] designation).

20 16. On December 3, 2003, ENVIRON submitted its "Work Plan for Confirmation Soil
21 Sampling and Final Round of Ground water Sampling." The work plan included an historical
22 summary of the soil, soil gas, and ground water data collected from the Site. In a December 9,
23 2003 email (see Exhibit E), Mr. Young approved the work plan, noting that "the only comment I
24 have is with regard to analysis for VOCs. Due to the nature of this sampling event (confirmation
25 sampling for site closure), VOCs should be analyzed in both soil and ground water by EPA
26 Method 8260B. This analytical method covers a broader range of analytes, which is helpful
27 information in determining if the site is eligible for closure. Other than this issue, everything else
28 appears appropriate." ENVIRON addressed Mr. Young's comment using the requested method

1 on samples collected on December 18 and 22, 2003.

2 17. In a January 16, 2004 email (see Exhibit F), ENVIRON submitted to the Regional
3 Water Board the results of the confirmation soil sampling and final round of ground water
4 sampling and requested an NFA designation for the site. In a February 11, 2004 email (Exhibit
5 G), ENVIRON followed up with Mr. Young on the status of the NFA. In a February 24, 2004
6 email (see Exhibit H), Mr. Young requested a few items after talking to Regional Water Board
7 "management" for the "closure process." In a March 25, 2004 email (see Exhibit H), ENVIRON
8 submitted a case review form via electronic mail.

9 18. Following various emails between ENVIRON and Regional Water Board staff
10 (see Exhibit I), in a June 30, 2004 email (see Exhibit I), Mr. Liu stated that Mr. Young had begun
11 working on the NFA designation for the site.

12 19. In an August 10, 2004 email (see Exhibit J), ENVIRON once again submitted
13 information to Mr. Young regarding the Site use history.

14 20. Following various emails between ENVIRON and Regional Water Board staff
15 (see Exhibit K), in an October 1, 2004 email (see Exhibit L), Mr. Liu stated that the closure was
16 discussed with Dr. Arthur Heath, Remediation Section Chief.

17 21. In an October 6, 2004 telephone conversation with Mr. Liu, ENVIRON informed
18 the Regional Water Board that the Site is not located within the San Gabriel Valley Superfund
19 Area. Also, Mr. Liu stated that a deed restriction would be placed as part of the NFA designation
20 for the Site, restricting the use to non-sensitive receptors (i.e., excluding uses such as residential,
21 schools, health care). In an October 6, 2004 email (see Exhibit M), ENVIRON confirmed its
22 understanding of the results of the telephone discussion held earlier that day.

23 22. In a March 1, 2004 letter to the Regional Water Board (see Exhibit N), ENVIRON
24 requested removal of the remediation equipment from the Site. Subsequently, upon receiving the
25 Regional Water Board's approval, the remediation equipment was removed.

26 23. To address the Regional Water Board's concern that a deed restriction would be
27 required for unrestricted future use, and the implications of VOCs remaining in soil and ground
28 water, ENVIRON prepared a "Risk Assessment of Potential Migration of VOCs to Indoor Air,"

1 dated November 28, 2005. The risk assessment concluded that the "cumulative cancer risks are
2 no higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water
3 Board provide an NFA designation for "unrestricted use for the site." The Regional Water Board
4 submitted the risk assessment to the Office of Environmental Health Hazard Assessment
5 (OEHHA) for review. OEHHA provided its comments to the risk assessment in an email dated
6 January 17, 2006. On March 9, 2006, ENVIRON submitted a response to Regional Water Board
7 and OEHHA responding to the OEHHA comments. In its April 17, 2006 memorandum
8 addressed to the Regional Water Board, OEHHA stated that it agreed with ENVIRON's
9 conclusions regarding the risk assessment, but raised certain questions for Regional Water Board
10 consideration. The OEHHA memorandum was first submitted to ENVIRON via facsimile on
11 July 13, 2006.

12 24. On January 19, 2007, representatives from ENVIRON (George Linkletter, CY
13 Jeng, Eddie Arslanian), the Regional Water Board (Adnan Siddiqui¹ and David Young), and
14 representatives of the property owner and Leggett & Platt met to discuss the outstanding items
15 raised in the OEHHA memo. It is my recollection and understanding that, at that meeting, the
16 Regional Water Board agreed on an approach to address the various comments made by OEHHA.

17 25. At the January 19, 2007 meeting, Messrs. Siddiqui and Young indicated that they
18 would discuss with Regional Water Board upper management whether there would be a need to
19 conduct a post-remediation soil vapor study to confirm that there had been no change in the Site
20 from the last ground water sampling as part of the closure process.

21 26. In a March 16, 2007 telephone conversation, David Young stated to Eddie
22 Arslanian that Ms. Su Han had been assigned as the case supervisor for the Site, taking over from
23 Adnan Siddiqui. George Linkletter, Eddie Arslanian, Seema Sutarwala and Regional Water Board
24 staff (Su Han and David Young) met on May 16, 2008. At that meeting, in spite of the history of
25 events, as summarized above, Regional Water Board staff stated that additional work would be
26 required prior to obtaining closure for the Site. Regional Water Board staff, however, did not

27
28 ¹ Adnan Siddiqui took over the site supervisor position after J.T. Liu transferred to the
California Department of Toxic Substances Control.

1 identify any new evidence or changes of circumstance that would justify the Regional Water
2 Board's apparent change in position.

3 27. My opinion regarding the current status of the Site and the probability of off site
4 migration is based on the historical investigations conducted by other consultants, as well as
5 ENVIRON's Investigation Results Report and subsequent reports of ground water and soil
6 testing results.

7 28. In my opinion, investigation, assessment, and remediation activities conducted to
8 date, and the data derived as a result thereof, do not support the need for further investigation for
9 the following reasons:

- 10 • The Site is located on shallow alluvial deposits, which lie above a non-waterbearing
11 formation. Further, borings and wells installed at the Site confirm that the water-bearing
12 strata at the Site is locally non-contiguous and that there is relatively little water present.
13 In light of these data, contamination detected in shallow ground water beneath the Site
14 does not pose a threat to aquifers that may be present down valley to the west of the Site.
- 15 • There are no public supply or privately owned wells within a one-mile radius of the Site.
- 16 • Ground water testing between 2001 and 2003 demonstrated that PCE levels in the ground
17 water beneath the Site were reduced by orders of magnitude (e.g., from a peak of 4,800
18 µg/l to 26 ug/l at MW2, which is located immediately adjacent to the source area at the
19 Site) as a result of Regional Water Board approved remediation at the Site.
- 20 • Investigations relating to historic operations at the Site are inconclusive regarding the
21 cause of the PCE contamination at the Site but clearly defined the source area. Given the
22 results of the assessment, investigation, and remediation at the Site, it appears that source
23 contamination at the Site has been sufficiently remediated and remaining materials do not
24 pose a substantial risk to human health or the environment.
- 25 • Data collected from monitoring wells and soil borings along the western property line of
26 the Site (as well as other data points located downgradient from the source area), when
27 compared to substantially higher contamination levels in the source area on the Site and
28 within the context of the hydrostratigraphy at the Site, indicate only limited migration of

1 contaminants away from the source area.

- 2 • The radius of influence of the remediation system that operated at the Site, which include
3 an extraction well immediately adjacent to the Site's western property line, indicate that
4 the remedial process also addressed adjacent contamination which may have migrated to
5 the downgradient property.
- 6 • The analytical results from the deepest samples were judged reflective of ground water
7 conditions and demonstrated only low or nondetectable concentrations of contaminants
8 along the western site boundary prior to the startup of the remediation system.
- 9 • ENVIRON prepared a "Risk Assessment of Potential Migration of VOCs to Indoor Air,"
10 dated November 28, 2005, which concluded that the "cumulative cancer risks are no
11 higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water
12 Board provide an NFA designation for "unrestricted use for the site." In its April 17,
13 2006 memorandum addressed to the Regional Water Board, OEHHA stated that it agreed
14 with ENVIRON's conclusions regarding the risk assessment.
- 15 • The Regional Water Board has previously determined that the Site is suitable for closure.
16 To my knowledge, the Regional Water Board has no new information or evidence to
17 suggest a change from the empirical results that the Regional Board relied on to authorize
18 the removal of the remediation equipment in preparation to formally close the Site, and
19 thus to justify the demand for additional investigation of VOC's at the Site.
- 20 • Remaining contamination at and beneath the Site should dissipate without further active
21 remediation and there is no evidence to suggest that it will pose a significant risk to
22 human health or the environment.

23 29. The cost of additional investigation would require the development of a new scope
24 of work for off-site investigation, installation of ground water wells, monitoring costs, additional
25 reporting and related work.

26 30. Since approximately 1998, approximately \$913,000 has been spent to address
27 environmental investigations and remediation at the Site. The minimum estimated costs to
28 comply with the requirements of the Regional Water Board's Order dated June 11, 2008 will

likely be on the order of \$250,000, as illustrated in the estimate presented in the table below.

Order Requirement	Expenditures and Associated Timeframes
#1: Site Conceptual Model	\$25,000 (by August 19, 2008)
#2: Preparation and Implementation of Work Plan for Ground Water Characterization	\$25,000 (by August 19, 2008) \$130,000 (starting September 2008—assuming Regional Water Board approval of work plan within 30 days of submittal)
#3: Preparation and Implementation of Work Plan for Soil Gas Investigation, and vapor Intrusion Evaluation.	\$10,000 (by August 2008) \$30,000 (between September and December 19, 2008)
#4: Resuming Semi-Annual Ground Water Monitoring	\$30,000 (minimum of 2 events). \$15,000 by January 31, 2009.

To date, ENVIRON has spent approximately \$913,000 in the site characterization, remediation and follow up consultation and reports to secure a closure. This does not take into consideration the costs incurred by RMT on behalf of Dresher Inc. or CLT Environmental on behalf of Valley Alhambra. To date, I estimate, based on our records and the information provided in connection with the RMT investigation and remediation and the CLT investigation, that over One Million Dollars has been spent to characterize and remediate the Site.

31. It is my opinion that the information regarding the use history of the Site and data from investigations by other consultants, ENVIRON's investigations, the ground water sampling data submitted to the Regional Water Board after the completion of the remediation at the Site, and the results of ENVIRON's human health risk assessment strongly suggest that there is a low probability of significant off-site contamination migrating from the Site that would present an unacceptable risk to human health.

32. It is also my opinion that, given the extensive work performed at the Site over the last 10 years, characterization of the Site is sufficient to understand the pre- and post-remedial conditions at the Site.

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33. Further, it is my opinion that the Regional Water Board's June 11, 2008 Order to commence a new investigation would result in excessive costs that will not result in corresponding benefits to public health and safety especially given the Regional Water Board's Order, which does not define the clear objectives of the additional testing.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed this 10th day of July, 2008, at Los Angeles, California.

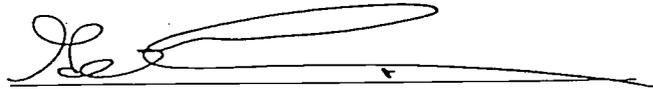

GEORGE O. LINKLETTER, Declarant

Exhibit A

George O. Linkletter, Ph.D.

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Education

- 1971 Ph.D., Geology, University of Washington, Seattle
- 1967 A.M., Geology, Dartmouth College, Hanover, New Hampshire
- 1965 A.B., Geology, Dartmouth College, Hanover, New Hampshire

Registrations and Certifications

Professional Geologist, California

Experience

Dr. Linkletter is a Principal at ENVIRON International Corporation. He has over 35 years of experience in the fields of geochemistry and environmental, mathematical, engineering, and seismic geology. Since the early 1970s, when he developed one of the first academic programs in environmental geology in the United States, Dr. Linkletter has managed and participated in a wide range of projects dealing with industrial chemicals and wastes in the geologic and hydrologic environments. Many of these assignments were large interdisciplinary projects, including several projects designed to evaluate potential geoenvironmental-project interactions for facilities planned by the petroleum, utility, and hazardous waste management industries. These projects ranged from siting and designing waste management facilities to the characterization and remediation of environmental impairment at waste management facilities and industrial properties.

Dr. Linkletter managed and participated in the investigation and remediation of a number of USEPA and State of California Superfund sites. These assignments have included site investigations, remedial design and implementation, PRP allocation issues, and regulatory negotiation. Contaminants of concern at these sites have included chlorinated solvents, PCBs, heavy metals, asbestos, and petroleum hydrocarbons.

Throughout a broad spectrum of his work in the geological and engineering s geostatistics, sciences, Dr. Linkletter has had a strong focus on risk management, using applied mathematics, geostatistics, and decision analysis to quantify and manage uncertainty, thereby facilitating business decision making for his clients. For over a decade, Dr. Linkletter has served as a senior advisor and management consultant to major financial institutions and manufacturing firms, participating in the development and upgrading of corporate-wide environmental health and safety programs, guiding staffing decisions for corporate and divisional environmental programs, and establishing protocols for environmental due diligence.

Dr. Linkletter has an active litigation support/expert witness practice. Recent issues that have been the subject of his evaluation and testimony include the origin and timing of soil and ground water contamination, the standard of practice for environmental due diligence and related environmental tasks, compliance with the National Contingency Plan, and allocation of costs and responsibility.

Dr. Linkletter has also participated in and directed scientific research projects and applied investigations in many parts of North America, South America, Europe, Africa, and both polar regions. Much of his work has included the development and use of computer models and

George O. Linkletter, Ph.D.

geochemical techniques to study complex natural systems. He has applied the results of these studies to a variety of programs ranging from investigations for the siting and design of lifelines and critical facilities to large weather-modification projects. Dr. Linkletter received the U.S. Antarctic Service Medal for his research in geology, glaciology, and polar meteorology, and has been an invited speaker at universities throughout the United States, Europe, and South America. Dr. Linkletter formerly was a Vice President with Woodward Clyde Consultants, and a Managing Principal with Harding Lawson Associates in southern California.

Representative Projects

- Aswan High Dam, Egypt - Project manager for comprehensive engineering evaluation of seismic stability of the High Dam. Assessment included seismic and engineering geology, hydrogeology, seismology, and earthquake and geotechnical engineering. Client: Government of Egypt/U.S. Agency for International Development.
- Litigation support, Wilmington, North Carolina - Provided litigation support, including expert witness deposition testimony, related to the timing and origin of chlorinated solvent contamination in ground water beneath a former refrigeration coil manufacturing facility. Client: O'Melveny & Myers.
- Site investigation, regulatory negotiation, Carson, California - Performed an evaluation of the origin of chlorinated solvents in fill soils, native soils, and ground water beneath a multi-tenant light industrial complex that had formerly been used for metal fabrication and oil field production. Assisted the land owner in obtaining a no further action letter in spite of the presence of chlorinated solvents in the ground water beneath the property. Client: Jones, Day, Reavis & Pogue.
- Air and hazardous materials permitting, Irvine, California - Assisted the owner of a newly acquired property to obtain the air and other hazardous materials storage and handling permits required to open a specialty chemical formulation facility. Client: Alpha Metals.
- Litigation support, San Luis Obispo, California - Provided litigation support, including deposition and trial testimony, related to the standard of practice for environmental due diligence and site investigation related to the acquisition of a former railroad property for residential use. Client: Beveridge & Diamond.
- Site investigation and remediation, Arrowbear, California - Conducted a site investigation and remedial design and implementation at a former gasoline station acquired by a bank through foreclosure. Issues included the presence of petroleum and aromatic hydrocarbons in ground water in fractured bedrock, and the release of contaminants from the ground water into nearby surface waters. Assisted the bank to obtain reimbursement through the California Underground Tank Fund. Client: Aldrich & Bonnefin
- Site investigation, risk assessment, regulatory negotiations, San Diego, California - Assisted attorneys for a property owner in obtaining regulatory closure on a former agricultural property from which an underground tank had been removed in an undocumented process and on which elevated concentrations of chlorinated pesticides had been found. The closure of unused water supply wells was also an issue. Client: O'Melveny & Myers.

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- Site investigation, regulatory negotiations, City of Industry, California - Assisted attorneys to the owner/operator of a carpet manufacturing facility targeted for inclusion as a PRP in the San Gabriel Valley Superfund program in obtaining a no further action letter from the RWQCB, and thus avoid the Superfund-PRP designation. Client: Kirkland & Ellis.
- Ground water investigation and remediation, Colorado - Project manager for multiphased evaluation, characterization, and remediation of volatile organic chemicals in two ground water plumes at a major electronics manufacturing facility. Statistical sampling design was used to limit the scope and costs of the investigation while achieving the required level of confidence in results. Client: Hewlett-Packard Company.
- Environmental due diligence for industrial acquisition - Managed the evaluation of world-wide environmental liabilities for a consortium of banks involved in the financing of Loral's purchase of Ford Aerospace. Client: Simpson Thacher & Bartlett.
- Ground water investigation and remediation, Palo Alto, California - Project Director for a large program that included the characterization and remediation of soil and ground water contamination by heavy metals and industrial solvents at two electronics manufacturing facilities and an area-wide Superfund site in Palo Alto. Client: Hewlett-Packard Company and Varian Associates.
- Site characterization and remediation, City of Commerce, California - Directed the comprehensive investigation of site use history and soil and ground water contamination and the remediation of soil and ground water contamination by chlorinated solvents and petroleum hydrocarbons at a former industrial manufacturing facility. Client: Jones, Day Reavis & Pogue.
- Emergency response 106 Order removal action, Los Angeles, California - Managed the planning and implementation of an emergency response removal action associated with a USEPA 106 Order issued to the owners and former operators of a metal plating facility. Issues included the presence of large volumes of highly concentrated chromic acid in deteriorating aboveground tanks, uncontrolled access to laboratory chemicals, contaminated plating vats and air handling systems, and the management of over 100,000 gallons of contaminated stormwater runoff. Client: McDermott, Will & Emery
- Litigation support, Anaheim, California - Provided litigation support, including expert testimony in deposition and at trial, related to the standard of practice for environmental due diligence and the origin of chlorinated solvents in soil and ground water at a former aircraft component manufacturing facility. Client: Kirkland & Ellis.
- Litigation support, Santa Clara County, California - Provided litigation support, including preparation of a declaration and an expert report related to historical mining, ore production and processing, and mining waste handling at the New Almaden mercury mine. Client: Beveridge & Diamond.
- Environmental due diligence, Huntington Beach, California - Conducted an environmental due diligence assessment for a sporting goods retailer that was acquiring neighboring properties to expand an existing retail facility. Provided oversight of the remediation of a former gasoline service station by the oil company that previously operated the station. Conducted Phase II investigations related to underground tanks and

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hydraulic hoists at a former recreational vehicle sale and service facility at the property.
Client: Sports Chalet/Trammell Crow.

- Litigation support, Sunnyvale, California - Provided litigation support and deposition testimony related to the origin of chlorinated solvents present in ground water beneath a office park located downgradient of several former semiconductor manufacturing facilities and service stations. Client: Quarles & Brady.
- Litigation support, El Cajon, California - Provided broad-based litigation support to the law firm defending an insurance carrier in a matter related to a claim of environmental damages. Issues included the timing and nature of a release of petroleum hydrocarbons from a former underground tank, the distribution of soil and ground water contamination, and remedial strategies and costs. Client: Morrison & Foerster.
- Environmental due diligence, Burbank, California - Assisted a major retailer in the evaluation of environmental issues related to the prospective purchase of a nearly 100 acre former aircraft manufacturing. Plans for the property called for comprehensive redevelopment into a regional-scale shopping center. Client: Wal-Mart.
- Litigation support, Sunnyvale, California - Provided a detailed critique of the technical approach to and costs of investigation and remedial work at a former semiconductor facility on behalf of a former owner/operator in a private CERCLA recovery action. Also assisted in the preparation for and participated in depositions of the technical experts designated by the adverse parties. Client: Pettit & Martin
- Environmental due diligence, nationwide - Assisted a major nationwide realty management company in developing its pre-acquisition environmental due diligence protocols and a program for annual post-acquisition evaluation of properties in the company's portfolio. ENVIRON conducts this program for the client and provides oversight of tenant response to recommended or mandated changes in their environmental management practices. Client: Confidential.
- Litigation support, Tampa, Florida - Provided comprehensive technical and regulatory litigation support and expert witness testimony for attorneys defending the former owner of a metal scrap yard from claims by the new owner for costs related to environmental investigations and remediation. The primary issues related to the requirements for, approach to, and costs for the investigation and remediation of soils contaminated with heavy metals, PCBs, and petroleum hydrocarbons. Client: Trenam, Simmons, Kemker, Scharf, Barkin, Frye & O'Neill.
- Litigation support, Tampa, Florida - Provided comprehensive technical and regulatory litigation support and expert witness testimony for attorneys defending the Hillsborough County, Florida in a suit that alleged that the County's mosquito abatement district had contaminated soils on portions of an island in Tampa Bay that was subsequently redeveloped into condominiums. The principal contaminants at issue were pesticides, PCBs, and petroleum hydrocarbons. Client: Trenam, Simmons, Kemker, Scharf, Barkin, Frye & O'Neill.
- Litigation support, Los Angeles, California - Provided litigation support to attorneys for a family trust from which land was taken by a school district in an eminent domain action. The primary dispute related to the school district's proposed reduction in the fair market

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value of the property due to costs associated with the investigation and remediation of soil contamination from underground gasoline tanks. A favorable settlement was achieved when ENVIRON successfully demonstrated that much of the work undertaken by the district's consultant was unnecessary. Client: Richards, Watson & Greaten.

- Site investigation, Costa Mesa, California - Assisted the owner of a property used to manufacture munitions in dealing with the tenant responsible for ground water contamination with industrial solvents. Designed and conducted ground water investigations sufficient to demonstrate that the current tenant was likely responsible for the ground water contamination. Thereafter, on behalf of the landowner, provided oversight of the site investigation and remediation work conducted by the tenant's consultant. Also provided briefings for financial institutions considering involvement at the site. Client: Confidential.
- Site investigation, regulatory support, Houston, Texas - Assisted the owner/operator of a plastics fabrication facility to respond to a regulatory citation for the release of petroleum hydrocarbons to a surface drainageway. Conducted a soil sampling and analytical program that demonstrated that the observed impact was related to heavy, relatively immobile hydrocarbons only and that the impact was restricted to surficial soils, thereby eliminating the need for regulatory mandated remediation. Client: NAMPAC
- Site investigation, Superfund, litigation support, Burbank and Glendale, California - Assisted the owner of a long-term industrial site in the San Fernando Valley with the investigation of soil and ground water conditions at and near the site, and with the planning and design of interim and final remedial measures. Assisted with regulatory negotiations, Superfund (PRP) allocation issues, and insurance coverage claims. Client: Confidential.
- Site investigation, Universal City, California - Assisted MCA Development, the land owner for a facility used by Technicolor (tenant) to process movie film, by providing oversight and regulatory guidance related to Technicolor's removal of underground tanks and the investigation/remediation of contaminated soil and ground water at the property. Client: Seagrams.
- Waste minimization, San Pedro, California - Assisted the operator of a petrochemical storage facility in the Port of Los Angeles to evaluate and report its waste management practices in order to comply with government imposed waste minimization requirements. Client: GATX.
- Regulatory guidance, Carson, California - Provided advice and written testimony to attorneys representing the owner of properties near the Cal Compact landfill, for which an integrated remediation/redevelopment scheme was being considered by the California DTSC. Concerns related to the sufficiency of the site investigation/characterization on which the remedial plans were based, and plans to create vertically stratified Operable Units. Client: Kelley, Drye & Warren.
- Environmental due diligence, site investigations, and site remediation at various locations in the western United States - Worked with attorneys to Home Depot to provide technical assessments and regulatory guidance related to the acquisition of new properties to be redeveloped into Home Depot stores. Client: Latham & Watkins.

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- Environmental due diligence, St. Louis, Mo. - Conducted an environmental due diligence evaluation of a former automotive manufacturing facility that was undergoing redevelopment for commercial and light industrial use. Client: The Koll Company.
- Litigation support, Los Angeles, California - Provided litigation support to attorneys representing the business successor to a paint manufacturing company that had once occupied a portion of what became Lawry's California Center. Issues related to the origin of chemicals found in the soil and ground water, the mechanisms through which those chemicals reached the soil, and the remedial requirements for the site. Client: Millard, Pilchowski, Holweger & Child.
- Litigation support, regulatory negotiations, site investigation and remediation, risk assessment, Commerce, California - On behalf of a former property owner, evaluated the need for planned remediations at the property, conducted risk assessment and vadose zone modeling to demonstrate that only a focused remediation was needed. Participated in negotiations with the RWQCB and the current site owner. Client: INSILCO
- Site investigation, remediation, Anaheim Hills, California - On behalf of attorneys representing a property owner, conducted an investigation of soil and ground water at a dry cleaning facility located in a shopping center. Designed and installed a soil vapor extraction remedial system that allowed the tenant space to continue to be used while remediation was ongoing. Client: O'Melveny & Myers.
- Ground water contamination assessment, southern California - Assisted the new owner of a golf course purchased from the Resolution Trust in dealing with an area-wide ground water contamination problem that originated at two nearby electronics two manufacturing facilities, but which had spread broadly beneath the golf course, thereby inhibiting development of on-site water supply needed for irrigation. Client: Confidential.
- Litigation support, San Diego, California - Provided broad-based technical and regulatory litigation support and expert witness assistance to attorneys defending an insurance company in an environmental claims action related to the costs to investigate and remediate soil contamination from an underground storage tank previously removed from the site. Client: O'Melveny & Myers.
- Site assessment and regulatory assistance, Santa Monica, California - Provided a detailed third-party review of a site investigation and remedial action plan prepared for the bankrupt landowner on behalf of the mortgage holder that wished to foreclose on the property. Assisted in negotiations with the Regional Water Quality Control Board, the oil company that had previously operated at the site, and the current site owner. Conducted forensic testing of samples of floating free product petroleum hydrocarbons in order to identify that age of the product and potentially the responsible oil company. Client: Mutual Benefit Life Insurance Company.
- Environmental due diligence, Yosemite National Park, California - ENVIRON provided a pro bono evaluation of environmental liabilities associated with concessionaire operations in Yosemite National Park in association with the efforts of a not-for-profit environmental organization to purchase the concession operations in the park after the then current operator was purchased by a foreign-owned corporation. Client: Skadden, Arps, Slate, Meagher & Flom.

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- Litigation support, Santa Clara, California - Provided litigation support to attorneys defending an engineering consulting firm in a suit alleging negligent performance in the course of a pre-acquisition site assessment and subsequent site investigation at a former industrial site being redeveloped for residential use. Client: Ware & Freidenrich.
- Expert review panel, Los Angeles, California - Served as a member of an expert panel assembled to review a base isolation design for a major new trauma care facility being designed for Los Angeles County. Client: Fluor Daniel
- Environmental due diligence for acquisition of railroad facilities and equipment, nationwide - Managed Phase I and Phase II environmental audits and site assessments at numerous railcar repair and servicing facilities nationwide in association with the planned acquisition of the rolling stock and fixed-base assets of ITEL. Client: General Electric Capital Corporation.
- Environmental due diligence, southern California - Provided a detailed assessment of an approximately 1,000 acre former aircraft manufacturing facility being redeveloped into a major mixed use complex on behalf of a potential investor. The assessment included comprehensive review of several large-scale site investigation and remedial design programs conducted by others in the past and of existing manufacturing operations on a part of the property. A Monte Carlo simulation approach was used to evaluate likely future costs related to environmental matters. Client: O'Melveny & Myers.
- Pre-demolition site investigation, San Diego, California - Performed an evaluation of site use history and the results of previous site investigations, conducted an asbestos survey, and located and sampled a series of underground tanks and sumps to assist a new land plan the demolition of a one block area on the edge of downtown San Diego. Client: Jones, Day, Reavis & Pogue.
- Crude oil pipeline, Ventura and Santa Barbara Counties, California - Project manager for seismic, geologic, and geotechnical evaluations for a crude oil pipeline to be used to transport oil produced offshore to an existing pipeline system, Probabilistic assessment techniques were used to quantify the seismic risk and specify the engineering design parameters for two major fault crossings. Client: Chevron USA.
- ANGTS Fault study, Alaska - Project manager for fault study for Alaska Natural Gas Transportation System pipeline. The project, which resulted in the specification of engineering design parameters for major active fault crossings, included analysis of remote sensing imagery, field reconnaissance and detailed field studies, and extensive mathematical modeling of seismic risk along proposed pipeline route. Client: Northwest Alaska Pipeline Company/Fluor Engineers.
- Oil refinery site characterization, Carson, California - Project manager for characterization of a 75-acre site that included a refinery, tank farm, land farm, and landfill. Research of historical site use information and the application of statistical sampling design techniques allowed the site conditions to be evaluated at a specified level of confidence prior to the sale of the property. Client: Cabot, Cabot and Forbes/Beacon Oil Company.
- Site assessment strategy, California - Project manager for a program to assist a major California bank in developing an environmental due diligence program to manage the

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bank's risks associated with making loans on potentially contaminated properties. The program focused on development of screening and decision-making criteria, and on education of loan officers and appraisers. Client: Union Bank

- MX missile system environmental assessment, California/Nevada/Arizona/Utah - Managed and performed multiple assignments in support of U.S. Air Force's evaluation of environmental considerations related to siting a new defense system. Topics included water supply, seismic hazards, erosion problems, and development of remote sensing imagery interpretation techniques. Client: HDR/U.S. Air Force.
- Towers of San Diego, San Diego, California - Project sponsor and principal technical reviewer for geotechnical engineering evaluation and hazardous waste assessment for major high-rise redevelopment project. Work included a foundation investigation, seismic hazards evaluation, preliminary hazardous materials assessment, removal of underground storage tanks, and asbestos survey and removal. Client: Cabot, Cabot and Forbes.
- Liquefaction evaluation, San Juan, Argentina - Performed geologic and engineering evaluation of distribution of liquefaction and related structural damage following major earthquake along the foothills of the Andes. Analysis of remote sensing imagery led to the recognition that most liquefaction had occurred along paleo-stream channels, which had no topographic expression, but which provided the requisite soil and ground water conditions for liquefaction. Client: U.S. Geologic Survey.
- Surface impoundments evaluation, southern California - Project manager for evaluation of hazardous waste impoundments at electrical generating stations. Work resulted in comprehensive hydrogeologic assessment report for each station, in accordance with provisions of the California Toxic Pits Act. Client: Southern California Edison.
- Remedial investigation and remediation, southern California - Project sponsor and principal technical reviewer for comprehensive characterization and remediation of site with soil and ground water contamination by organic solvents. Remediation of five source areas and a complex ground water plume included limited soil excavation with on-site aeration, vapor extraction, and a pump-and-treat ground water system using both injection and extraction wells. Client: Confidential.
- Second-opinion review consultation, western United States - Provided individual consultation for corporate environmental health and safety department of a major electronics firm. Services focused on the technical review of consultant reports and strategic planning related to environmental impairment issues. Client: Hewlett-Packard.
- Site assessments for commercial real estate transactions, nationwide - Project manager for program of preliminary site assessments prior to purchase of properties by nationwide development company. Developed standard approach and protocols, coordinated technical staff assignments for consultant offices around the United States, and provided detailed technical review. Client: Cabot, Cabot and Forbes
- Lead smelter site characterization, Vernon, California - Supervised investigation of soil and ground water contamination at site used for smelting of lead for over 60 years. Contaminants included heavy metals, organic volatiles, and unusually low soil pH.

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Remediation focused on capping and pH adjustment instead of excavation and off-site disposal. Client: GNB.

- Metal smelter site characterization, El Segundo, California - Managed response to regulatory strike force demands for evaluation of conditions at property on the State's abandoned sites list. Considerations included arsenic in ground water, a large slag pile with high heavy metal concentrations, and uncontrolled access to old furnaces and a chemical laboratory. Client: Confidential.
- Lake Chakachamna hydroelectric project, Alaska - Managed geologic and geotechnical investigations for proposed lake tap hydroelectric project near Cook Inlet in the southern Alaska Range. Considerations included seismic and volcanic hazards, engineering geology for 11-mile-long tunnel, and glaciological evaluation of large natural ice dam that impounds Lake Chakachamna. Client: Bechtel/Alaska Power Authority.
- Regional landfill, eastern Pennsylvania - Performed siting study for an association of municipal governments to identify a suitable location for a large regional landfill. Limestone bedrock in the area severely limited the number of candidate sites. Geologic and hydrogeologic investigation, including tracer studies, led to the identification of a site that met all the mandated State siting criteria. Client: Confidential.
- Casmalia disposal site, Santa Maria, California - Served as senior technical reviewer for geologic and hydrogeologic aspects of evaluation of the Casmalia Class I disposal site. Work included evaluation of current conditions related to impoundments and landfills at the facility and assessment of options for closure of ponds and expansion of landfilling operations. Client: Casmalia Resources.
- Wilshire-Westwood project, Los Angeles, California - Managed investigation of soil contamination discovered during foundation excavation at a high-rise construction project in the Westwood District of Los Angeles. Statistical sampling design was used to formulate an excavation management plan, which resulted in significant savings over earlier estimates of the cost to handle the contaminated soil. Client: Poydras Services.
- Franciscan Ceramics project, Los Angeles, California - Directed the above- and below-ground site characterization, geotechnical evaluations, and remedial action plan preparation at the 45-acre Franciscan Ceramics site. The principal environmental issues included asbestos, PCBs, underground tanks and clarifiers, heavy metal-contaminated dust, and lead-contaminated manufacturing wastes. Client: Schurgin Development Companies
- Amusement park company acquisition, nationwide - Consultant to a major financial institution that was requested to fund the private acquisition of a large amusement park company with 40 sites nationwide. The major issue was underground storage tanks. The assignment included the evaluation of the potential financial exposure associated with known and possible environmental problems associated with the underground tanks. Client: Union Bank.
- Dairy acquisition, southern California - Directed the multi-phase evaluation of environmental liabilities associated with the processing and distribution facilities of a major dairy company under consideration for acquisition by an international food company. The principal issues were asbestos in existing structures and soil and ground

George O. Linkletter, Ph.D.

water contamination beneath several underground tank installations. Client: Confidential.

- Risk management and consultation, nationwide - Reviewed existing technical reports and data regarding environmental conditions at sites throughout the United States on behalf of a major Japanese investment banking company. Provided independent third-party review, performed selected independent preliminary site assessments, and advised the client on risk management strategies. Client: Confidential.
- Seismic advisory committee, Los Angeles, California - Served as a member of the Organizing Committee for the Port of Los Angeles (POLA) Seismic Risk Subcommittee as a part of POLA's 2020 Program. Assisted in the development of a strategy for the Port to evaluate and engineer for regional and local seismic hazards that might impact existing facilities and planned 2020 developments in the Port. Client: Port of Los Angeles.

Professional Affiliations

American Association for the Advancement of Science

American Quaternary Association

Earthquake Engineering Res. Institute

The Explorers Club

Geological Society of America

International Glaciological Society

International Association of Mathematical Geology

Seismological Society of America

Publications and Presentations

Dr. Linkletter has authored and co-authored over 30 technical papers in the earth and atmospheric sciences. These papers have been published in the Journal of Glaciology, Antarctic Journal of the United States, New Zealand Journal of Geology and Geophysics, Mathematical Geology, Journal of Applied Meteorology, Journal de Recherches Atmospheriques, and the proceedings of national and international conferences.

Exhibit B



California Regional Water Quality Control Board Los Angeles Region



Winston H. Hickox
Secretary for
Environmental
Protection

(50 Years Serving Coastal Los Angeles and Ventura Counties)

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrcb.ca.gov/rwqcb4>

Gray Davis
Governor

EA

June 5, 2001

Mr. Robert Anderson
Leggett & Platt, Incorporated
One Leggett Road
Carthage, MO 64836

REVIEW OF RESPONSE TO REQUEST FOR A SUBSURFACE SITE ASSESSMENT WORK PLAN, VALLEY ALHAMBRA PROPERTY - 4900 EAST VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA 90032 (SLIC NO. 967)

Dear Mr. Anderson:

Los Angeles Regional Water Quality Control Board (Regional Board) staff has reviewed the April 30, 2001 "Response to Request for a Subsurface Site Assessment Work Plan, Valley Alhambra Property, 4900 East Valley Boulevard, Los Angeles, CA" (Response), prepared by Environ Corporation (Environ). The Response responds to the Regional Board correspondence of January 17, 2001, in which it was noted that the previous site investigations did not fully delineate the full extent of the volatile organic compound (VOC) plume. Environ's response to our correspondence provides a summary of the investigations to date and discusses the local and regional geology and hydrogeology. The Response indicates that there are no drinking water wells within one mile of the site and that the ground water beneath the site is found in thin alluvium over non-water bearing bedrock. The Response states that based on the previous investigations and a Regional Board letter dated October 21, 1994, that the soil has been sufficiently characterized.

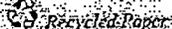
However, the "Investigation Results Report, Valley Alhambra Property, 4900 East Valley Boulevard, Los Angeles, CA" dated December 9, 1999 and prepared by Environ, showed that the extent of VOC contamination in the soil west of the suspected source area is not fully defined. The October 21, 1994 Regional Board letter that is referred to in the Response pertained to the fuel hydrocarbons associated with contamination from a former underground tank, not the volatile organic compounds presently found on site.

You are required to submit a work plan to delineate soil west of the suspected source area for Regional Board review and approval by July 15, 2001. The plan shall include, but need not be limited to the following:

- a. The rationale for soil sampling locations, depths and sampling protocol for further delineation of the impact of VOCs and metals;
- b. The rationale for the number, locations and design of groundwater monitoring wells;
- c. A protocol to obtain groundwater flow direction and gradient;
- d. A health and safety plan;
- e. A chemical analysis plan to include analytical methods, detection limits, and other QA/QC requirements;
- f. An Investigation Derived Waste Management Plan
- g. A proposed project schedule

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/challenge.html>



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Robert Anderson
Leggett & Platt

-2-

June 5, 2001

If you need clarification or require additional information, please contact Mr. Sam Unger at (213) 576-6782.

Sincerely,



Rebecca Chon, Ph.D., P.E.
Chief of Site Cleanup Unit

cc: Bita Tabatabai, Environ
Joan C. Donnellan, Eelsland, Parashmi, Stenberg, Matzger & Melnick, LLP
Gary J. Herman, Sr., S.D. Herman Co., Inc.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
For a list of simple ways to reduce demand and cut your energy costs, see the list at <http://www.swrcb.ca.gov/dep/energychallenge.html>

♻️ Recycled Paper

Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Exhibit C



Del Mar Analytical

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2520 E. Sunset Rd. #3, Las Vegas, NV 89120 (702) 798-3620 FAX (702) 798-3621

Environ
2010 Main Street, 9th Floor
Irvine, CA 92614

Attention: Brett Moore

Subject: 2001 Valley Alhambra report, project 04-9065A
Del Mar Analytical report IKF0951

Dear Mr. Moore,

Please find enclosed a copy of the final report for the project referenced above as requested.

Should you have any questions or comments please contact me at (949) 261-1022, ext. 213.

Sincerely,
DEL MAR ANALYTICAL

Patty Mata
Project Manager

Enclosure



Del Mar Analytical

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LABORATORY REPORT

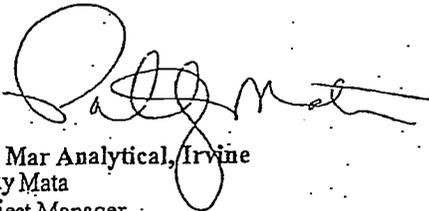
Prepared For: Environ-Irvine
2010 Main Street, 9th Floor
Irvine, CA 92614

Attention: Bitu Tabatabai
Project: Valley Alhambra
04-9065A

Sampled: 06/22/01
Received: 06/22/01
Reported: 07/02/01

*This laboratory report is confidential and is intended for the sole use of
Del Mar Analytical and its client. This entire report was reviewed and approved for release.*

CA ELAP Certificate #1197
AZ DHS License #AZ0428



Del Mar Analytical, Irvine
Patty Mata
Project Manager

MAILED

JUL 03 2001

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 9830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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SAMPLE CROSS REFERENCE

LABORATORY NUMBER	SAMPLE DESCRIPTION	SAMPLE MATRIX	ANALYSES
IKF0951-01	SB1-2-2.5	Soil	EPA 6010B EPA 7471A EPA 8260B
IKF0951-02	SB1-5-5.5	Soil	EPA 8260B
IKF0951-03	SB1-9.2-9.7	Soil	EPA 8260B
IKF0951-04	SB1-13-13.5	Soil	EPA 8260B
IKF0951-05	SB2-2-2.5	Soil	EPA 6010B EPA 7471A EPA 8260B
IKF0951-06	SB2-5-5.5	Soil	EPA 8260B
IKF0951-07	SB2-9.2-9.7	Soil	EPA 8260B
IKF0951-08	SB2-14-14.5	Soil	EPA 8260B

DEL MAR ANALYTICAL, IRVINE (CA ELAP #1197)

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-01 (SB1-2-2.5 - Soil)								
Benzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	11F2825	20	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result	Factor	Extracted	Analyzed	Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-01 (SB1-2-2.5 - Soil)								
Styrene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	I1F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)				105 %				
Surrogate: Toluene-d8 (80-120%)				101 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				103 %				

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-02 (SB1-5-5.5 - Soil)								
Benzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Bromobenzene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Bromochloromethane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Bromodichloromethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Bromoform	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Bromomethane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
n-Butylbenzene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
sec-Butylbenzene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
tert-Butylbenzene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Carbon tetrachloride	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Chlorobenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Chloroethane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Chloroform	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Chloromethane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
2-Chlorotoluene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
4-Chlorotoluene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Dibromochloromethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Dibromomethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dichlorobenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,3-Dichlorobenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,4-Dichlorobenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Dichlorodifluoromethane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
1,1-Dichloroethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dichloroethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,1-Dichloroethene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dichloropropane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,3-Dichloropropane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
2,2-Dichloropropane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,1-Dichloropropene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Ethylbenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Hexachlorobutadiene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
Isopropylbenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
p-Isopropyltoluene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Methylene chloride	EPA 8260B	11F2908	20	ND	1	6/29/01	6/29/01	
Naphthalene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
n-Propylbenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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 Attention: Bitu Tabatabai

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Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result	Factor	Extracted	Analyzed	Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-02 (SB1-5-5.5 - Soil)								
Styrene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
1,1,2-Tetrachloroethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Tetrachloroethene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Toluene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,2,3-Trichlorobenzene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
1,2,4-Trichlorobenzene	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
1,1,1-Trichloroethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,1,2-Trichloroethane	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Trichloroethene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Trichlorofluoromethane	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
1,2,3-Trichloropropane	EPA 8260B	11F2908	10	ND	1	6/29/01	6/29/01	
1,2,4-Trimethylbenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
1,3,5-Trimethylbenzene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Vinyl chloride	EPA 8260B	11F2908	5.0	ND	1	6/29/01	6/29/01	
o-Xylene	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
m,p-Xylenes	EPA 8260B	11F2908	2.0	ND	1	6/29/01	6/29/01	
Surrogate: Dibromofluoromethane (85-125%)				96.8 %				
Surrogate: Toluene-d8 (80-120%)				101 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				85.4 %				

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 Patty Mata
 Project Manager

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IKF0951 <Page 6 of 33>



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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu-Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-03 (SB1-9.2-9.7 - Soil)								
Benzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	11F2825	20	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-03 (SB1-9.2-9.7 - Soil)								
Styrene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	11F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)								109 %
Surrogate: Toluene-d8 (80-120%)								102 %
Surrogate: 4-Bromofluorobenzene (80-120%)								100 %

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 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-04 (SB1-13-13.5 - Soil)								
Benzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	

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 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result	Factor	Extracted	Analyzed	Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-04 (SB1-13-13.5 - Soil)								
Styrene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	I1F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)				108 %				
Surrogate: Toluene-d8 (80-120%)				102 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				100 %				

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 Patty Mata
 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-05 (SB2-2-2.5 - Soil)								
Benzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	11F2825	20	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-05 (SB2-2-2.5 - Soil)								
Styrene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	11F2825	2.0	18	1	6/28/01	6/28/01	
Toluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	11F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)				108 %				
Surrogate: Toluene-d8 (80-120%)				102 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				102 %				

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 Project Manager

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result		Factor	Extracted	Analyzed
			ug/kg	ug/kg				
Sample ID: IKF0951-06 (SB2-5-5.5 - Soil)								
Benzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	11F2825	20	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	

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 Project Manager

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Project ID: Valley Alhambra
 Report Number: IKF0951
 Sampled: 06/22/01
 Received: 06/22/01

Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-06 (SB2-5-5.5 - Soil)								
Styrene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	11F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	11F2825	2.0	2.4	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)								106 %
Surrogate: Toluene-d8 (80-120%)								103 %
Surrogate: 4-Bromofluorobenzene (80-120%)								104 %

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Environ-Irvine
 2010 Main Street, 9th Floor.
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result	Factor	Extracted	Analyzed	Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-07 (SB2-9.2-9.7 - Soll)								
Benzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	I1F2825	20	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-07 (SB2-9.2-9.7 - Soil)								
Styrene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	11F2825	2.0	4.9	1	6/28/01	6/28/01	
Toluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	11F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)				109 %				
Surrogate: Toluene-d8 (80-120%)				103 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				101 %				

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Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result	Factor	Extracted	Analyzed	Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-08 (SB2-14-14.5 - Soil)								
Benzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Bromobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Bromochloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Bromodichloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Bromoform	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Bromomethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
n-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
sec-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
tert-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Carbon tetrachloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Chlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Chloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Chloroform	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Chloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
2-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
4-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Dibromochloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Dibromomethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Dichlorodifluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
1,1-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,1-Dichloroethene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,3-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
2,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,1-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Ethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Hexachlorobutadiene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Isopropylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
p-Isopropyltoluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Methylene chloride	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Naphthalene	EPA 8260B	I1F2825	5.0	7.9	1	6/28/01	6/29/01	
n-Propylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	

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Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result	Factor	Extracted	Analyzed	Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-08 (SB2-14-14.5 - Soil)								
Styrene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/29/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/29/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/29/01	
Tetrachloroethene	EPA 8260B	11F2825	2.0	21	1	6/28/01	6/29/01	
Toluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/29/01	
1,2,3-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/29/01	
1,2,4-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/29/01	
1,1,1-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/29/01	
1,1,2-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/29/01	
Trichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/29/01	
Trichlorofluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/29/01	
1,2,3-Trichloropropane	EPA 8260B	11F2825	10	ND	1	6/28/01	6/29/01	
1,2,4-Trimethylbenzene	EPA 8260B	11F2825	2.0	23	1	6/28/01	6/29/01	
1,3,5-Trimethylbenzene	EPA 8260B	11F2825	2.0	7.6	1	6/28/01	6/29/01	
Vinyl chloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/29/01	
o-Xylene	EPA 8260B	11F2825	2.0	5.0	1	6/28/01	6/29/01	
m,p-Xylenes	EPA 8260B	11F2825	2.0	12	1	6/28/01	6/29/01	
Surrogate: Dibromofluoromethane (85-125%)				108 %				
Surrogate: Toluene-d8 (80-120%)				102 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				100 %				

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Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METALS

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			mg/kg	mg/kg				
Sample ID: IKF0951-01 (SB1-2-2.5 - Soil)								
Antimony	EPA 6010B	11F2642	10	ND	1	6/26/01	6/26/01	
Arsenic	EPA 6010B	11F2642	2.0	ND	1	6/26/01	6/26/01	
Barium	EPA 6010B	11F2642	1.0	36	1	6/26/01	6/26/01	
Beryllium	EPA 6010B	11F2642	0.50	ND	1	6/26/01	6/26/01	
Cadmium	EPA 6010B	11F2642	0.50	1.4	1	6/26/01	6/26/01	
Chromium	EPA 6010B	11F2642	1.0	6.7	1	6/26/01	6/26/01	
Cobalt	EPA 6010B	11F2642	1.0	3.3	1	6/26/01	6/26/01	
Copper	EPA 6010B	11F2642	1.0	7.8	1	6/26/01	6/26/01	
Lead	EPA 6010B	11F2642	2.0	4.0	1	6/26/01	6/26/01	
Mercury	EPA 7471A	11F2635	0.020	0.19	1	6/26/01	6/26/01	
Molybdenum	EPA 6010B	11F2642	2.0	ND	1	6/26/01	6/26/01	
Nickel	EPA 6010B	11F2642	1.0	3.8	1	6/26/01	6/26/01	
Selenium	EPA 6010B	11F2642	2.0	2.6	1	6/26/01	6/26/01	
Silver	EPA 6010B	11F2642	1.0	ND	1	6/26/01	6/26/01	
Thallium	EPA 6010B	11F2642	10	ND	1	6/26/01	6/26/01	
Titanium	EPA 6010B	11F2642	2.0	340	1	6/26/01	6/26/01	
Vanadium	EPA 6010B	11F2642	1.0	19	1	6/26/01	6/26/01	
Zinc	EPA 6010B	11F2642	5.0	23	1	6/26/01	6/26/01	
Sample ID: IKF0951-05 (SB2-2-2.5 - Soil)								
Antimony	EPA 6010B	11F2642	10	ND	1	6/26/01	6/26/01	
Arsenic	EPA 6010B	11F2642	2.0	ND	1	6/26/01	6/26/01	
Barium	EPA 6010B	11F2642	1.0	56	1	6/26/01	6/26/01	
Beryllium	EPA 6010B	11F2642	0.50	ND	1	6/26/01	6/26/01	
Cadmium	EPA 6010B	11F2642	0.50	2.2	1	6/26/01	6/26/01	
Chromium	EPA 6010B	11F2642	1.0	12	1	6/26/01	6/26/01	
Cobalt	EPA 6010B	11F2642	1.0	4.2	1	6/26/01	6/26/01	
Copper	EPA 6010B	11F2642	1.0	10	1	6/26/01	6/26/01	
Lead	EPA 6010B	11F2642	2.0	5.5	1	6/26/01	6/26/01	
Mercury	EPA 7471A	11F2635	0.020	0.20	1	6/26/01	6/26/01	
Molybdenum	EPA 6010B	11F2642	2.0	ND	1	6/26/01	6/26/01	
Nickel	EPA 6010B	11F2642	1.0	5.5	1	6/26/01	6/26/01	
Selenium	EPA 6010B	11F2642	2.0	3.3	1	6/26/01	6/26/01	
Silver	EPA 6010B	11F2642	1.0	ND	1	6/26/01	6/26/01	
Thallium	EPA 6010B	11F2642	10	ND	1	6/26/01	6/26/01	
Titanium	EPA 6010B	11F2642	2.0	440	1	6/26/01	6/26/01	
Vanadium	EPA 6010B	11F2642	1.0	25	1	6/26/01	6/26/01	
Zinc	EPA 6010B	11F2642	5.0	28	1	6/26/01	6/26/01	

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Environ-Irvine
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Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: 11F2825 Extracted: 06/28/01										
Blank Analyzed: 06/28/01 (11F2825-BLK1)										
Benzene	ND	2.0	ug/kg							
Bromobenzene	ND	5.0	ug/kg							
Bromochloromethane	ND	5.0	ug/kg							
Bromodichloromethane	ND	2.0	ug/kg							
Bromoform	ND	5.0	ug/kg							
Bromomethane	ND	5.0	ug/kg							
n-Butylbenzene	ND	5.0	ug/kg							
sec-Butylbenzene	ND	5.0	ug/kg							
tert-Butylbenzene	ND	5.0	ug/kg							
Carbon tetrachloride	ND	5.0	ug/kg							
Chlorobenzene	ND	2.0	ug/kg							
Chloroethane	ND	5.0	ug/kg							
Chloroform	ND	2.0	ug/kg							
Chloromethane	ND	5.0	ug/kg							
2-Chlorotoluene	ND	5.0	ug/kg							
4-Chlorotoluene	ND	5.0	ug/kg							
Dibromochloromethane	ND	2.0	ug/kg							
1,2-Dibromo-3-chloropropane	ND	5.0	ug/kg							
1,2-Dibromoethane (EDB)	ND	2.0	ug/kg							
Dibromomethane	ND	2.0	ug/kg							
1,2-Dichlorobenzene	ND	2.0	ug/kg							
1,3-Dichlorobenzene	ND	2.0	ug/kg							
1,4-Dichlorobenzene	ND	2.0	ug/kg							
Dichlorodifluoromethane	ND	5.0	ug/kg							
1,1-Dichloroethane	ND	2.0	ug/kg							
1,2-Dichloroethane	ND	2.0	ug/kg							
1,1-Dichloroethene	ND	5.0	ug/kg							
cis-1,2-Dichloroethene	ND	2.0	ug/kg							
trans-1,2-Dichloroethene	ND	2.0	ug/kg							
1,2-Dichloropropane	ND	2.0	ug/kg							
1,3-Dichloropropane	ND	2.0	ug/kg							
2,2-Dichloropropane	ND	2.0	ug/kg							
1,1-Dichloropropene	ND	2.0	ug/kg							
cis-1,3-Dichloropropene	ND	2.0	ug/kg							
trans-1,3-Dichloropropene	ND	2.0	ug/kg							
Ethylbenzene	ND	2.0	ug/kg							

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Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: I1F2825 Extracted: 06/28/01									
Blank Analyzed: 06/28/01 (I1F2825-BLK1)									
Hexachlorobutadiene	ND	5.0	ug/kg						
Isopropylbenzene	ND	2.0	ug/kg						
p-Isopropyltoluene	ND	2.0	ug/kg						
Methylene chloride	ND	20	ug/kg						
Naphthalene	ND	5.0	ug/kg						
n-Propylbenzene	ND	2.0	ug/kg						
Styrene	ND	2.0	ug/kg						
1,1,1,2-Tetrachloroethane	ND	5.0	ug/kg						
1,1,2,2-Tetrachloroethane	ND	2.0	ug/kg						
Tetrachloroethene	ND	2.0	ug/kg						
Toluene	ND	2.0	ug/kg						
1,2,3-Trichlorobenzene	ND	5.0	ug/kg						
1,2,4-Trichlorobenzene	ND	5.0	ug/kg						
1,1,1-Trichloroethane	ND	2.0	ug/kg						
1,1,2-Trichloroethane	ND	2.0	ug/kg						
Trichloroethene	ND	2.0	ug/kg						
Trichlorofluoromethane	ND	5.0	ug/kg						
1,2,3-Trichloropropane	ND	10	ug/kg						
1,2,4-Trimethylbenzene	ND	2.0	ug/kg						
1,3,5-Trimethylbenzene	ND	2.0	ug/kg						
Vinyl chloride	ND	5.0	ug/kg						
o-Xylene	ND	2.0	ug/kg						
m,p-Xylenes	ND	2.0	ug/kg						
Surrogate: Dibromofluoromethane	52.9		ug/kg	50.0		106	85-125		
Surrogate: Toluene-d8	51.1		ug/kg	50.0		102	80-120		
Surrogate: 4-Bromofluorobenzene	51.5		ug/kg	50.0		103	80-120		
LCS Analyzed: 06/28/01 (I1F2825-BS1)									
Benzene	48.4	2.0	ug/kg	50.0		96.8	75-130		
Bromobenzene	49.9	5.0	ug/kg	50.0		99.8	75-130		
Bromochloromethane	50.2	5.0	ug/kg	50.0		100	70-140		
Bromodichloromethane	54.1	2.0	ug/kg	50.0		108	75-135		
Bromoform	52.8	5.0	ug/kg	50.0		106	55-130		
Bromomethane	44.8	5.0	ug/kg	50.0		89.6	65-140		
n-Butylbenzene	50.0	5.0	ug/kg	50.0		100	75-130		
sec-Butylbenzene	49.6	5.0	ug/kg	50.0		99.2	80-135		
tert-Butylbenzene	47.0	5.0	ug/kg	50.0		94.0	75-130		

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 Patty Mata
 Project Manager

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	Limit	RPD RPD	Limit	Data Qualifiers
Batch: 11F2825 Extracted: 06/28/01										
LCS Analyzed: 06/28/01 (11F2825-BS1)										
Carbon tetrachloride	49.8	5.0	ug/kg	50.0		99.6	70-160			
Chlorobenzene	51.8	2.0	ug/kg	50.0		104	75-130			
Chloroethane	48.5	5.0	ug/kg	50.0		97.0	65-135			
Chloroform	50.2	2.0	ug/kg	50.0		100	75-130			
Chloromethane	44.8	5.0	ug/kg	50.0		89.6	45-130			
2-Chlorotoluene	48.4	5.0	ug/kg	50.0		96.8	75-130			
4-Chlorotoluene	49.5	5.0	ug/kg	50.0		99.0	80-130			
Dibromochloromethane	51.9	2.0	ug/kg	50.0		104	70-140			
1,2-Dibromo-3-chloropropane	48.0	5.0	ug/kg	50.0		96.0	50-145			
1,2-Dibromoethane (EDB)	55.5	2.0	ug/kg	50.0		111	60-145			
Dibromomethane	51.6	2.0	ug/kg	50.0		103	65-135			
1,2-Dichlorobenzene	46.7	2.0	ug/kg	50.0		93.4	75-130			
1,3-Dichlorobenzene	47.4	2.0	ug/kg	50.0		94.8	75-130			
1,4-Dichlorobenzene	46.2	2.0	ug/kg	50.0		92.4	80-125			
Dichlorodifluoromethane	45.6	5.0	ug/kg	50.0		91.2	10-140			
1,1-Dichloroethane	50.5	2.0	ug/kg	50.0		101	75-135			
1,2-Dichloroethane	49.2	2.0	ug/kg	50.0		98.4	65-140			
1,1-Dichloroethene	50.7	5.0	ug/kg	50.0		101	70-145			
cis-1,2-Dichloroethene	48.0	2.0	ug/kg	50.0		96.0	70-130			
trans-1,2-Dichloroethene	50.4	2.0	ug/kg	50.0		101	75-140			
1,2-Dichloropropane	50.6	2.0	ug/kg	50.0		101	75-130			
1,3-Dichloropropane	55.9	2.0	ug/kg	50.0		112	65-140			
2,2-Dichloropropane	44.2	2.0	ug/kg	50.0		88.4	75-150			
1,1-Dichloropropene	47.2	2.0	ug/kg	50.0		94.4	75-140			
cis-1,3-Dichloropropene	52.8	2.0	ug/kg	50.0		106	65-135			
trans-1,3-Dichloropropene	53.6	2.0	ug/kg	50.0		107	65-140			
Ethylbenzene	50.7	2.0	ug/kg	50.0		101	75-135			
Hexachlorobutadiene	47.5	5.0	ug/kg	50.0		95.0	75-150			
Isopropylbenzene	49.1	2.0	ug/kg	50.0		98.2	80-135			
p-Isopropyltoluene	45.6	2.0	ug/kg	50.0		91.2	75-130			
Methylene chloride	50.1	20	ug/kg	50.0		100	70-125			
Naphthalene	45.0	5.0	ug/kg	50.0		90.0	50-145			
n-Propylbenzene	51.0	2.0	ug/kg	50.0		102	80-135			
Styrene	52.6	2.0	ug/kg	50.0		105	75-140			
1,1,1,2-Tetrachloroethane	52.7	5.0	ug/kg	50.0		105	75-135			
1,1,2,2-Tetrachloroethane	55.7	2.0	ug/kg	50.0		111	70-135			

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Fabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/OC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: 11F2825 Extracted: 06/28/01									
LCS Analyzed: 06/28/01 (11F2825-BS1)									
Tetrachloroethene	53.5	2.0	ug/kg	50.0		107 75-130			
Toluene	47.2	2.0	ug/kg	50.0		94.4 75-130			
1,2,3-Trichlorobenzene	45.6	5.0	ug/kg	50.0		91.2 50-140			
1,2,4-Trichlorobenzene	48.0	5.0	ug/kg	50.0		96.0 70-130			
1,1,1-Trichloroethane	48.3	2.0	ug/kg	50.0		96.6 75-140			
1,1,2-Trichloroethane	52.0	2.0	ug/kg	50.0		104 65-130			
Trichloroethene	47.3	2.0	ug/kg	50.0		94.6 75-130			
Trichlorofluoromethane	55.7	5.0	ug/kg	50.0		111 55-145			
1,2,3-Trichloropropane	53.2	10	ug/kg	50.0		106 60-140			
1,2,4-Trimethylbenzene	50.5	2.0	ug/kg	50.0		101 80-130			
1,3,5-Trimethylbenzene	50.7	2.0	ug/kg	50.0		101 80-135			
Vinyl chloride	44.3	5.0	ug/kg	50.0		88.6 45-140			
o-Xylene	49.8	2.0	ug/kg	50.0		99.6 75-130			
m,p-Xylenes	100	2.0	ug/kg	100		100 75-135			
Surrogate: Dibromofluoromethane	53.3		ug/kg	50.0		107 85-125			
Surrogate: Toluene-d8	51.0		ug/kg	50.0		102 80-120			
Surrogate: 4-Bromofluorobenzene	52.1		ug/kg	50.0		104 80-120			
Matrix Spike Analyzed: 06/28/01 (11F2825-MS1)									
Source: IKF0951-01									
Benzene	46.5	2.0	ug/kg	50.0	ND	93.0 45-140			
Bromodichloromethane	52.6	2.0	ug/kg	50.0	ND	105 75-140			
Bromoform	56.4	5.0	ug/kg	50.0	ND	113 55-150			
Chlorobenzene	49.5	2.0	ug/kg	50.0	ND	99.0 75-135			
Chloroform	49.2	2.0	ug/kg	50.0	ND	98.4 75-140			
Dibromochloromethane	52.5	2.0	ug/kg	50.0	ND	105 70-140			
1,4-Dichlorobenzene	43.8	2.0	ug/kg	50.0	ND	87.6 80-145			
1,1-Dichloroethane	49.8	2.0	ug/kg	50.0	ND	99.6 70-150			
1,2-Dichloroethane	50.2	2.0	ug/kg	50.0	ND	100 65-145			
1,1-Dichloroethene	49.8	5.0	ug/kg	50.0	ND	99.6 70-165			
Ethylbenzene	48.3	2.0	ug/kg	50.0	ND	96.6 55-140			
Naphthalene	50.2	5.0	ug/kg	50.0	ND	100 65-175			
Tetrachloroethene	50.0	2.0	ug/kg	50.0	ND	100 75-200			
Toluene	45.4	2.0	ug/kg	50.0	ND	90.8 50-140			
Trichloroethene	45.2	2.0	ug/kg	50.0	ND	90.4 75-145			
Vinyl chloride	41.5	5.0	ug/kg	50.0	ND	83.0 45-160			
o-Xylene	47.5	2.0	ug/kg	50.0	ND	95.0 75-150			
m,p-Xylenes	95.3	2.0	ug/kg	100	ND	95.3 55-160			

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: I1F2825 Extracted: 06/28/01										
Matrix Spike Analyzed: 06/28/01 (I1F2825-MS1)					Source: IKF0951-01					
Surrogate: Dibromofluoromethane	54.4		ug/kg	50.0		109	85-125			
Surrogate: Toluene-d8	51.4		ug/kg	50.0		103	80-120			
Surrogate: 4-Bromofluorobenzene	52.4		ug/kg	50.0		105	80-120			
Matrix Spike Dup Analyzed: 06/28/01 (I1F2825-MSD1)					Source: IKF0951-01					
Benzene	46.2	2.0	ug/kg	50.0	ND	92.4	45-140	0.647	20	
Bromodichloromethane	51.9	2.0	ug/kg	50.0	ND	104	75-140	1.34	20	
Bromoform	54.3	5.0	ug/kg	50.0	ND	109	55-150	3.79	30	
Chlorobenzene	49.3	2.0	ug/kg	50.0	ND	98.6	75-135	0.405	20	
Chloroform	48.0	2.0	ug/kg	50.0	ND	96.0	75-140	2.47	20	
Dibromochloromethane	51.8	2.0	ug/kg	50.0	ND	104	70-140	1.34	25	
1,4-Dichlorobenzene	44.9	2.0	ug/kg	50.0	ND	89.8	80-145	2.48	25	
1,1-Dichloroethane	48.5	2.0	ug/kg	50.0	ND	97.0	70-150	2.64	20	
1,2-Dichloroethane	49.0	2.0	ug/kg	50.0	ND	98.0	65-145	2.42	25	
1,1-Dichloroethene	49.0	5.0	ug/kg	50.0	ND	98.0	70-165	1.62	20	
Ethylbenzene	48.2	2.0	ug/kg	50.0	ND	96.4	55-140	0.207	20	
Naphthalene	48.4	5.0	ug/kg	50.0	ND	96.8	65-175	3.65	40	
Tetrachloroethene	50.6	2.0	ug/kg	50.0	ND	101	75-200	1.19	25	
Toluene	44.7	2.0	ug/kg	50.0	ND	89.4	50-140	1.55	20	
Trichloroethene	45.3	2.0	ug/kg	50.0	ND	90.6	75-145	0.221	20	
Vinyl chloride	41.3	5.0	ug/kg	50.0	ND	82.6	45-160	0.483	30	
o-Xylene	47.5	2.0	ug/kg	50.0	ND	95.0	75-150	0.00	20	
m,p-Xylenes	95.6	2.0	ug/kg	100	ND	95.6	55-160	0.314	20	
Surrogate: Dibromofluoromethane	54.0		ug/kg	50.0		108	85-125			
Surrogate: Toluene-d8	51.1		ug/kg	50.0		102	80-120			
Surrogate: 4-Bromofluorobenzene	52.1		ug/kg	50.0		104	80-120			

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Project ID: Valley Alhambra
 Report Number: IKF0951
 Sampled: 06/22/01
 Received: 06/22/01

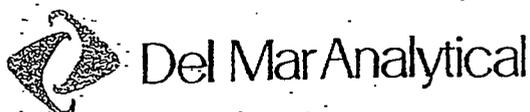
Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	RPD Limits RPD	Data Qualifiers
Batch: IIF2908 Extracted: 06/29/01								
Blank Analyzed: 06/29/01 (IIF2908-BLK1)								
Benzene	ND	2.0	ug/kg					
Bromobenzene	ND	5.0	ug/kg					
Bromochloromethane	ND	5.0	ug/kg					
Bromodichloromethane	ND	2.0	ug/kg					
Bromoform	ND	5.0	ug/kg					
Bromomethane	ND	5.0	ug/kg					
n-Butylbenzene	ND	5.0	ug/kg					
sec-Butylbenzene	ND	5.0	ug/kg					
tert-Butylbenzene	ND	5.0	ug/kg					
Carbon tetrachloride	ND	5.0	ug/kg					
Chlorobenzene	ND	2.0	ug/kg					
Chloroethane	ND	5.0	ug/kg					
Chloroform	ND	2.0	ug/kg					
Chloromethane	ND	5.0	ug/kg					
2-Chlorotoluene	ND	5.0	ug/kg					
4-Chlorotoluene	ND	2.0	ug/kg					
Dibromochloromethane	ND	5.0	ug/kg					
1,2-Dibromo-3-chloropropane	ND	2.0	ug/kg					
1,2-Dibromoethane (EDB)	ND	2.0	ug/kg					
Dibromomethane	ND	2.0	ug/kg					
1,2-Dichlorobenzene	ND	2.0	ug/kg					
1,3-Dichlorobenzene	ND	2.0	ug/kg					
1,4-Dichlorobenzene	ND	5.0	ug/kg					
Dichlorodifluoromethane	ND	2.0	ug/kg					
1,1-Dichloroethane	ND	2.0	ug/kg					
1,2-Dichloroethane	ND	5.0	ug/kg					
1,1-Dichloroethene	ND	2.0	ug/kg					
cis-1,2-Dichloroethene	ND	2.0	ug/kg					
trans-1,2-Dichloroethene	ND	2.0	ug/kg					
1,2-Dichloropropane	ND	2.0	ug/kg					
1,3-Dichloropropane	ND	2.0	ug/kg					
2,2-Dichloropropane	ND	2.0	ug/kg					
1,1-Dichloropropene	ND	2.0	ug/kg					
cis-1,3-Dichloropropene	ND	2.0	ug/kg					
trans-1,3-Dichloropropene	ND	2.0	ug/kg					
Ethylbenzene	ND	2.0	ug/kg					

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: 11F2908 Extracted: 06/29/01									
Blank Analyzed: 06/29/01 (11F2908-BLK1)									
Hexachlorobutadiene	ND	5.0	ug/kg						
Isopropylbenzene	ND	2.0	ug/kg						
p-Isopropyltoluene	ND	2.0	ug/kg						
Methylene chloride	ND	20	ug/kg						
Naphthalene	ND	5.0	ug/kg						
n-Propylbenzene	ND	2.0	ug/kg						
Styrene	ND	2.0	ug/kg						
1,1,1,2-Tetrachloroethane	ND	5.0	ug/kg						
1,1,2,2-Tetrachloroethane	ND	2.0	ug/kg						
Tetrachloroethene	ND	2.0	ug/kg						
Toluene	ND	2.0	ug/kg						
1,2,3-Trichlorobenzene	ND	5.0	ug/kg						
1,2,4-Trichlorobenzene	ND	5.0	ug/kg						
1,1,1-Trichloroethane	ND	2.0	ug/kg						
1,1,2-Trichloroethane	ND	2.0	ug/kg						
Trichloroethene	ND	2.0	ug/kg						
Trichlorofluoromethane	ND	5.0	ug/kg						
1,2,3-Trichloropropane	ND	10	ug/kg						
1,2,4-Trimethylbenzene	ND	2.0	ug/kg						
1,3,5-Trimethylbenzene	ND	2.0	ug/kg						
Vinyl chloride	ND	5.0	ug/kg						
o-Xylene	ND	2.0	ug/kg						
m,p-Xylenes	ND	2.0	ug/kg						
Surrogate: Dibromofluoromethane	45.8		ug/kg	50.0		91.6	85-125		
Surrogate: Toluene-d8	49.5		ug/kg	50.0		99.0	80-120		
Surrogate: 4-Bromofluorobenzene	46.0		ug/kg	50.0		92.0	80-120		
LCS Analyzed: 06/29/01 (11F2908-BS1)									
Benzene	54.7	2.0	ug/kg	50.0		109	75-130		
Bromobenzene	53.1	5.0	ug/kg	50.0		106	75-130		
Bromochloromethane	50.4	5.0	ug/kg	50.0		101	70-140		
Bromodichloromethane	51.2	2.0	ug/kg	50.0		102	75-135		
Bromoform	49.5	5.0	ug/kg	50.0		99.0	55-130		
Bromomethane	56.0	5.0	ug/kg	50.0		112	65-140		
n-Butylbenzene	50.6	5.0	ug/kg	50.0		101	75-130		
sec-Butylbenzene	52.2	5.0	ug/kg	50.0		104	80-135		
tert-Butylbenzene	50.9	5.0	ug/kg	50.0		102	75-130		

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 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: 11F2908 Extracted: 06/29/01									
LCS Analyzed: 06/29/01 (11F2908-BS1)									
Carbon tetrachloride	59.6	5.0	ug/kg	50.0		119 70-160			
Chlorobenzene	54.2	2.0	ug/kg	50.0		108 75-130			
Chloroethane	49.9	5.0	ug/kg	50.0		99.8 65-135			
Chloroform	50.8	2.0	ug/kg	50.0		102 75-130			
Chloromethane	43.8	5.0	ug/kg	50.0		87.6 45-130			
2-Chlorotoluene	50.0	5.0	ug/kg	50.0		100 75-130			
4-Chlorotoluene	50.7	5.0	ug/kg	50.0		101 80-130			
Dibromochloromethane	51.2	2.0	ug/kg	50.0		102 70-140			
1,2-Dibromo-3-chloropropane	36.0	5.0	ug/kg	50.0		72.0 50-145			
1,2-Dibromoethane (EDB)	46.7	2.0	ug/kg	50.0		93.4 60-145			
Dibromomethane	50.1	2.0	ug/kg	50.0		100 65-135			
1,2-Dichlorobenzene	49.9	2.0	ug/kg	50.0		99.8 75-130			
1,3-Dichlorobenzene	51.6	2.0	ug/kg	50.0		103 75-130			
1,4-Dichlorobenzene	53.6	2.0	ug/kg	50.0		107 80-125			
Dichlorodifluoromethane	51.0	5.0	ug/kg	50.0		102 10-140			
1,1-Dichloroethane	46.8	2.0	ug/kg	50.0		93.6 75-135			
1,2-Dichloroethane	44.2	2.0	ug/kg	50.0		88.4 65-140			
1,1-Dichloroethene	51.7	5.0	ug/kg	50.0		103 70-145			
cis-1,2-Dichloroethene	47.9	2.0	ug/kg	50.0		95.8 70-130			
trans-1,2-Dichloroethene	52.4	2.0	ug/kg	50.0		105 75-140			
1,2-Dichloropropane	46.0	2.0	ug/kg	50.0		92.0 75-130			
1,3-Dichloropropane	49.4	2.0	ug/kg	50.0		98.8 65-140			
2,2-Dichloropropane	51.1	2.0	ug/kg	50.0		102 75-150			
1,1-Dichloropropene	51.1	2.0	ug/kg	50.0		102 75-140			
cis-1,3-Dichloropropene	52.5	2.0	ug/kg	50.0		105 65-135			
trans-1,3-Dichloropropene	50.9	2.0	ug/kg	50.0		102 65-140			
Ethylbenzene	56.7	2.0	ug/kg	50.0		113 75-135			
Hexachlorobutadiene	43.0	5.0	ug/kg	50.0		86.0 75-150			
Isopropylbenzene	50.4	2.0	ug/kg	50.0		101 80-135			
p-Isopropyltoluene	50.3	2.0	ug/kg	50.0		101 75-130			
Methylene chloride	45.9	2.0	ug/kg	50.0		91.8 70-125			
Naphthalene	34.7	5.0	ug/kg	50.0		69.4 50-145			
n-Propylbenzene	52.6	2.0	ug/kg	50.0		105 80-135			
Styrene	56.5	2.0	ug/kg	50.0		113 75-140			
1,1,1,2-Tetrachloroethane	58.5	5.0	ug/kg	50.0		117 75-135			
1,1,2,2-Tetrachloroethane	44.6	2.0	ug/kg	50.0		89.2 70-135			

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Project ID: Valley Alhambra
 Report Number: IKF0951
 Sampled: 06/22/01
 Received: 06/22/01

Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: 11F2908 Extracted: 06/29/01									
LCS Analyzed: 06/29/01 (11F2908-BS1)									
Tetrachloroethene	59.3	2.0	ug/kg	50.0		119 75-130			
Toluene	54.6	2.0	ug/kg	50.0		109 75-130			
1,2,3-Trichlorobenzene	41.3	5.0	ug/kg	50.0		82.6 50-140			
1,2,4-Trichlorobenzene	45.8	5.0	ug/kg	50.0		91.6 70-130			
1,1,1-Trichloroethane	53.4	2.0	ug/kg	50.0		107 75-140			
1,1,2-Trichloroethane	46.2	2.0	ug/kg	50.0		92.4 65-130			
Trichloroethene	50.6	2.0	ug/kg	50.0		101 75-130			
Trichlorofluoromethane	50.3	5.0	ug/kg	50.0		101 55-145			
1,2,3-Trichloropropane	38.4	10	ug/kg	50.0		76.8 60-140			
1,2,4-Trimethylbenzene	50.0	2.0	ug/kg	50.0		100 80-130			
1,3,5-Trimethylbenzene	51.7	2.0	ug/kg	50.0		103 80-135			
Vinyl chloride	56.4	5.0	ug/kg	50.0		113 45-140			
o-Xylene	56.5	2.0	ug/kg	50.0		113 75-130			
m,p-Xylenes	118	2.0	ug/kg	100		118 75-135			
Surrogate: Dibromofluoromethane	47.0		ug/kg	50.0		94.0 85-125			
Surrogate: Toluene-d8	49.9		ug/kg	50.0		99.8 80-120			
Surrogate: 4-Bromofluorobenzene	49.2		ug/kg	50.0		98.4 80-120			
Matrix Spike Analyzed: 06/29/01 (11F2908-MS1)									
Source: IKF0787-07									
Benzene	55.9	2.0	ug/kg	50.0	ND	112 45-140			
Bromodichloromethane	51.7	2.0	ug/kg	50.0	ND	103 75-140			
Bromoform	51.1	5.0	ug/kg	50.0	ND	102 55-150			
Chlorobenzene	52.9	2.0	ug/kg	50.0	ND	106 75-135			
Chloroform	51.7	2.0	ug/kg	50.0	ND	103 75-140			
Dibromochloromethane	51.1	2.0	ug/kg	50.0	ND	102 70-140			
1,4-Dichlorobenzene	53.5	2.0	ug/kg	50.0	ND	107 80-145			
1,1-Dichloroethane	49.7	2.0	ug/kg	50.0	ND	99.4 70-150			
1,2-Dichloroethane	45.6	2.0	ug/kg	50.0	ND	91.2 65-145			
1,1-Dichloroethene	52.2	5.0	ug/kg	50.0	ND	104 70-165			
Ethylbenzene	55.3	2.0	ug/kg	50.0	ND	111 55-140			
Naphthalene	38.9	5.0	ug/kg	50.0	ND	77.8 65-175			
Tetrachloroethene	57.7	2.0	ug/kg	50.0	ND	115 75-200			
Toluene	55.8	2.0	ug/kg	50.0	ND	112 50-140			
Trichloroethene	53.4	2.0	ug/kg	50.0	ND	107 75-145			
Vinyl chloride	58.9	5.0	ug/kg	50.0	ND	118 45-160			
o-Xylene	55.8	2.0	ug/kg	50.0	ND	112 75-150			
m,p-Xylenes	115	2.0	ug/kg	100	ND	115 55-160			

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	Limit	RPD	RPD Limit	Data Qualifiers
Batch: IIF2908 Extracted: 06/29/01										
Matrix Spike Analyzed: 06/29/01 (IIF2908-MS1)										
Surrogate: Dibromofluoromethane	46.8		ug/kg	50.0		93.6	85-125			
Surrogate: Toluene-d8	49.8		ug/kg	50.0		99.6	80-120			
Surrogate: 4-Bromofluorobenzene	48.0		ug/kg	50.0		96.0	80-120			
Matrix Spike Dup Analyzed: 06/29/01 (IIF2908-MSD1)										
Benzene	55.3	2.0	ug/kg	50.0	ND	111	45-140	1.08	20	
Bromodichloromethane	51.7	2.0	ug/kg	50.0	ND	103	75-140	0.00	20	
Bromoform	50.1	5.0	ug/kg	50.0	ND	100	55-150	1.98	30	
Chlorobenzene	52.7	2.0	ug/kg	50.0	ND	105	75-135	0.379	20	
Chloroform	52.3	2.0	ug/kg	50.0	ND	105	75-140	1.15	20	
Dibromochloromethane	50.3	2.0	ug/kg	50.0	ND	101	70-140	1.58	25	
1,4-Dichlorobenzene	52.7	2.0	ug/kg	50.0	ND	105	80-145	1.51	25	
1,1-Dichloroethane	50.1	2.0	ug/kg	50.0	ND	100	70-150	0.802	20	
1,2-Dichloroethane	44.3	2.0	ug/kg	50.0	ND	88.6	65-145	2.89	25	
1,1-Dichloroethene	53.7	5.0	ug/kg	50.0	ND	107	70-165	2.83	20	
Ethylbenzene	55.0	2.0	ug/kg	50.0	ND	110	55-140	0.544	20	
Naphthalene	36.6	5.0	ug/kg	50.0	ND	73.2	65-175	6.09	40	
Tetrachloroethene	57.5	2.0	ug/kg	50.0	ND	115	75-200	0.347	25	
Toluene	55.4	2.0	ug/kg	50.0	ND	111	50-140	0.719	20	
Trichloroethene	55.6	2.0	ug/kg	50.0	ND	111	75-145	4.04	20	
Vinyl chloride	60.3	5.0	ug/kg	50.0	ND	121	45-160	2.35	30	
o-Xylene	55.5	2.0	ug/kg	50.0	ND	111	75-150	0.539	20	
m,p-Xylenes	113	2.0	ug/kg	100	ND	113	55-160	1.75	20	
Surrogate: Dibromofluoromethane	46.6		ug/kg	50.0		93.2	85-125			
Surrogate: Toluene-d8	49.5		ug/kg	50.0		99.0	80-120			
Surrogate: 4-Bromofluorobenzene	48.4		ug/kg	50.0		96.8	80-120			

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu-Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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METHOD BLANK/QC DATA

METALS

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	RPD Limits RPD	Data Limit	Qualifiers
Batch: I1F2635 Extracted: 06/26/01									
Blank Analyzed: 06/26/01 (I1F2635-BLK1)									
Mercury	ND	0.020	mg/kg						
LCS Analyzed: 06/26/01 (I1F2635-BS1)									
Mercury	0.837	0.020	mg/kg	0.800		105	85-120		
Matrix Spike Analyzed: 06/26/01 (I1F2635-MS1)									
Mercury	0.985	0.020	mg/kg	0.800	0.044	118	65-135		
Matrix Spike Dup Analyzed: 06/26/01 (I1F2635-MSD1)									
Mercury	0.880	0.020	mg/kg	0.800	0.044	104	65-135	11.3	20
Batch: I1F2642 Extracted: 06/26/01									
Blank Analyzed: 06/26/01 (I1F2642-BLK1)									
Antimony	ND	10	mg/kg						
Arsenic	ND	2.0	mg/kg						
Barium	ND	1.0	mg/kg						
Beryllium	ND	0.50	mg/kg						
Cadmium	ND	0.50	mg/kg						
Chromium	ND	1.0	mg/kg						
Cobalt	ND	1.0	mg/kg						
Copper	ND	1.0	mg/kg						
Lead	ND	2.0	mg/kg						
Molybdenum	ND	2.0	mg/kg						
Nickel	ND	1.0	mg/kg						
Selenium	ND	2.0	mg/kg						
Silver	ND	1.0	mg/kg						
Thallium	ND	10	mg/kg						
Titanium	ND	2.0	mg/kg						
Vanadium	ND	1.0	mg/kg						
Zinc	ND	5.0	mg/kg						

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 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

METALS

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: IIF2642 Extracted: 06/26/01									
LCS Analyzed: 06/26/01 (IIF2642-BS1)									
Antimony	47.0	10	mg/kg	50.0		94.0	80-120		
Arsenic	45.3	2.0	mg/kg	50.0		90.6	80-120		
Barium	45.2	1.0	mg/kg	50.0		90.4	80-120		
Beryllium	45.6	0.50	mg/kg	50.0		91.2	80-120		
Cadmium	45.6	0.50	mg/kg	50.0		91.2	80-120		
Chromium	44.8	1.0	mg/kg	50.0		89.6	80-120		
Cobalt	44.3	1.0	mg/kg	50.0		88.6	80-120		
Copper	45.5	1.0	mg/kg	50.0		91.0	80-120		
Lead	46.4	2.0	mg/kg	50.0		92.8	80-120		
Molybdenum	44.9	2.0	mg/kg	50.0		89.8	80-120		
Nickel	43.8	1.0	mg/kg	50.0		87.6	80-120		
Selenium	44.6	2.0	mg/kg	50.0		89.2	80-120		
Silver	23.1	1.0	mg/kg	25.0		92.4	80-120		
Thallium	43.1	10	mg/kg	50.0		86.2	80-120		
Titanium	46.8	2.0	mg/kg	50.0		93.6	80-120		
Vanadium	45.9	1.0	mg/kg	50.0		91.8	80-120		
Zinc	47.2	5.0	mg/kg	50.0		94.4	80-120		
Matrix Spike Analyzed: 06/26/01 (IIF2642-MS1)					Source: IKF0956-01				
Antimony	22.1	10	mg/kg	50.0	ND	44.2	75-125		M2
Arsenic	45.0	2.0	mg/kg	50.0	ND	87.2	75-125		
Barium	111	1.0	mg/kg	50.0	60	102	75-125		
Beryllium	44.4	0.50	mg/kg	50.0	ND	88.8	75-125		
Cadmium	44.2	0.50	mg/kg	50.0	1.5	85.4	75-125		
Chromium	63.8	1.0	mg/kg	50.0	16	95.6	75-125		
Cobalt	48.8	1.0	mg/kg	50.0	6.5	84.6	75-125		
Copper	62.9	1.0	mg/kg	50.0	16	93.8	75-125		
Lead	50.4	2.0	mg/kg	50.0	6.1	88.6	75-125		
Molybdenum	41.0	2.0	mg/kg	50.0	ND	81.5	75-125		
Nickel	56.6	1.0	mg/kg	50.0	14	85.2	75-125		
Selenium	43.7	2.0	mg/kg	50.0	ND	83.8	75-125		
Silver	22.4	1.0	mg/kg	25.0	ND	89.6	75-125		
Thallium	45.2	10	mg/kg	50.0	ND	83.0	75-125		
Titanium	1010	2.0	mg/kg	50.0	630	760	75-125		M-HA
Vanadium	84.6	1.0	mg/kg	50.0	29	111	75-125		
Zinc	89.1	5.0	mg/kg	50.0	45	88.2	75-125		

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 Patty Mata
 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
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 Attention: Bita Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

METALS

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: 11F2642 Extracted: 06/26/01										
Matrix Spike Dup Analyzed: 06/26/01 (11F2642-MSD1)										
Source: IKF0956-01										
Antimony	23.3	10	mg/kg	50.0	ND	46.6	75-125	5.29	20	M2
Arsenic	46.4	2.0	mg/kg	50.0	ND	90.0	75-125	3.06	20	
Barium	117	1.0	mg/kg	50.0	60	114	75-125	5.26	20	
Beryllium	45.8	0.50	mg/kg	50.0	ND	91.6	75-125	3.10	20	
Cadmium	46.5	0.50	mg/kg	50.0	1.5	90.0	75-125	5.07	20	
Chromium	66.5	1.0	mg/kg	50.0	16	101	75-125	4.14	20	
Cobalt	50.8	1.0	mg/kg	50.0	6.5	88.6	75-125	4.02	20	
Copper	66.8	1.0	mg/kg	50.0	16	102	75-125	6.01	20	
Lead	52.2	2.0	mg/kg	50.0	6.1	92.2	75-125	3.51	20	
Molybdenum	42.6	2.0	mg/kg	50.0	ND	84.7	75-125	3.83	20	
Nickel	58.9	1.0	mg/kg	50.0	14	89.8	75-125	3.98	20	
Selenium	46.4	2.0	mg/kg	50.0	ND	89.2	75-125	5.99	20	
Silver	23.4	1.0	mg/kg	25.0	ND	93.6	75-125	4.37	20	
Thallium	47.0	10	mg/kg	50.0	ND	86.6	75-125	3.90	20	
Titanium	1080	2.0	mg/kg	50.0	630	900	75-125	6.70	20	M-HA
Vanadium	89.3	1.0	mg/kg	50.0	29	121	75-125	5.41	20	
Zinc	94.1	5.0	mg/kg	50.0	45	98.2	75-125	5.46	20	

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 Patty Mata
 Project Manager

The results pertain only to the samples tested in the laboratory. This report shall not be reproduced, except in full, without written permission from Del Mar Analytical.

IKF0951 <Page 32 of 33>



Del Mar Analytical

2852 Alton Ave., Irvine, CA 92608 (949) 261-1022 FAX (949) 261-1228
1014 E. Coldby Dr., Suite A, Colton, CA 92324 (909) 370-4667 FAX (909) 370-1046
7277 Hayvenhurst, Suite B-12, Van Nuys, CA 91406 (818) 779-1844 FAX (818) 779-1843
9484 Chesapeake Dr., Suite 805, San Diego, CA 92123 (858) 505-8506 FAX (858) 505-9589
9830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

Environ-Irvine
2010 Main Street, 9th Floor
Irvine, CA 92614
Attention: Bitu Tabatabai

Project ID: Valley Alhambra
04-9065A
Report Number: IKF0951

Sampled: 06/22/01
Received: 06/22/01

DATA QUALIFIERS AND DEFINITIONS

- M-HA Due to high levels of analyte in the sample, the MS/MSD calculation does not provide useful spike recovery information. See Blank Spike (LCS).
- M2 The MS and/or MSD were below the acceptance limits due to sample matrix interference. See Blank Spike (LCS).
- ND Analyte NOT DETECTED at or above the reporting limit or MDL, if MDL is specified.
- NR Not reported.
- RPD Relative Percent Difference

Del Mar Analytical, Irvine
Patty Mata
Project Manager

The results pertain only to the samples tested in the laboratory. This report shall not be reproduced, except in full, without written permission from Del Mar Analytical.

IKF0951 <Page 33 of 33>

ENVIRON

2010 Main St., Suite 900
Irvine, California 92614
(949) 261-5151
(949) 261-5202 (FAX)

CHAIN-OF-CUSTODY

PROJECT NAME: VALLEY ALHAMBRA FIELD PERSON: Alex Marr
 PROJECT NUMBER: 04-9065A PROJECT MANAGER: Bitita Tabatabaai
 PROJECT LOCATION: 4900 E. VALLEY BL DATE: 6/22/01

SAMPLER	SIGNATURE	YEAR 7,2001	SAMPLE DATE	SAMPLE TIME	MATRIX (S) - SOIL (G) - GAS (W) - WATER	NUMBER OF CONTAINERS	FILTERED/UNFILTERED (F/U)	PRESERVATION (SEE KEY)	ANALYSIS REQUIRED	COMMENTS
SB1-2-2.5	<i>Alex Marr</i>		6-22	1246	S	1	4	100	✓	Please send analyses to Bitita Tabatabaai @ 949.261.5151
SB1-5-5.5			1254			1	1		✓	
SB1-9.2-9.7			1300			1	1		✓	
SB1-13-13.5			1307			1	1		✓	
SB2-2-2.5			1315			1	1		✓	Thanks
SB2-5-5.5			1335			1	1		✓	
SB2-9.2-9.7			1340			1	1		✓	
SB2-14-14.5			1347		✓	1	1	✓	✓	
TOTAL									6	62

RELINQUISHED BY: *Bitita Tabatabaai* TIME/DATE: 6/22/01 @ 1700
 RECEIVED BY: *Paula Sheppard* (COMPANY): DEC MAR TIME/DATE: 1700 6-22-01
 RELINQUISHED BY: *Paula Sheppard* TIME/DATE: 6-22-01 1755
 RECEIVED BY: *Bitita Tabatabaai* (COMPANY): ENVIRON TIME/DATE: 6/22/01 1755

TURNAROUND TIME (CIRCLE ONE) SAMEDAY 72 HOURS
24 HOURS 5 DAYS
48 HOURS (NORMAL)

SAMPLE INTEGRITY INTACT ON ICE X FILE LOGS GC

H = HOLD, N = HAZARDOUS, S = HAZARDOUS, U = UNKNOWN, NO = NONE, O = OTHER

Exhibit D

ENVIRON

October 15, 2002

Mr. J.T. Liu, P.E.
Mr. David Young
California Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: Request for Post-Remediation Monitoring
4900 East Valley Boulevard
Los Angeles, California (SLIC No. 967)

Dear Messrs. Liu and Young:

Enclosed please find the Third Quarter 2002 ground water monitoring report for 4900 East Valley Boulevard, Los Angeles, California (Site).

On October 8, 2002, Dr. George Linkletter, Bitu Tabatabai, and Eddie Arslanian of ENVIRON International Corporation (ENVIRON) met with you, as representatives from the California Regional Water Quality Control Board – Los Angeles Region (Regional Board), at the Site to review the history of chemical use at the Site and prior site characterization activities, and to discuss the status of remedial activities.

As discussed at the meeting, the 2-PHASE™ Extraction system used to treat volatile organic compounds (VOCs) in soil and ground water at the Site has been very effective. VOCs in ground water have decreased from concentrations of upwards of 4,800 micrograms per liter ($\mu\text{g/l}$) of tetrachloroethene, the primary VOC constituent at the Site, to near or below its maximum contaminant level of 5 $\mu\text{g/l}$, as established by the United States Environmental Protection Agency.

At the conclusion of the meeting, we requested, and you verbally agreed, that we be allowed to shut down the 2-PHASE™ Extraction system and to commence ground water monitoring to evaluate VOC rebound effects, if any. The system was shut down in your presence at approximately 2:00 p.m. on October 8, 2002. ENVIRON has tentatively scheduled the Fourth Quarter 2002 ground water monitoring event for the first week of December 2002. As you requested, ENVIRON will notify the Regional Board of the exact date, approximately one week in advance, once it has been scheduled.

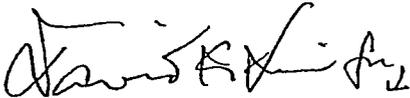
Messrs. J.T. Liu and David Young

-2-

October 15, 2002

On behalf of the entities that have assumed the task of addressing the presence of chlorinated solvents in the soil and ground water at the Site, we wish to restate our appreciation for your prompt attention to our request for a meeting to review the recent efforts to complete the remediation of this Site. As you can see from the monitoring data, it appears that we are very close to the point at which we will request closure, and we will further appreciate the Regional Board's expedited review of future submittals in anticipation of achieving a "closure" status.

Very truly yours,



George O. Linkletter, Ph.D., R.G. (No. 3728)
Principal



Bita Tabatabai, P.E. (No. C51294)
Manager



Eddie Arslanian
Senior Associate

\\Losangelesnt\projects\AA\hambra\Regional Board Correspondence\Cover Letter for 2002 3Q Ground Water Report.doc

Enclosure

Copy: Mr. Robert Anderson, Leggett & Platt
Ms. Joan Donnellan, Leland, Parachini, Steinberg, Matzger & Melnick, LLP
Mr. Gary Herman, S.D. Herman Co., Inc.

Exhibit E

-----Original Message-----

From: Eddie Arslanian
Sent: Wednesday, December 10, 2003 9:21 AM
To: 'David Young'
Cc: Ju-Tseng Liu; George Linkletter; Bitu Tabatabai
Subject: RE: Work Plan for Valley Alhambra Property

David, we will analyze the soil/gw samples by 8260B instead of 8021B. Historical soil samples have been analyzed by 8260B. However, please note that the quarterly gw samples have been historically analyzed by 8021B. Therefore, there could be some discrepancies in the gw samples results now between the 8021B and 8260B.

we are trying to arrange the sampling activities for next thursday the 18th. I will let you know once it gets finalized.

thanks.

-----Original Message-----

From: David Young [mailto:dyoung@rb4.swrcb.ca.gov]
Sent: Tuesday, December 09, 2003 4:17 PM
To: EArslanian@environcorp.com
Cc: Ju-Tseng Liu
Subject: Work Plan for Valley Alhambra Property

Hi Eddie,
I reviewed the Work Plan for Confirmation Soil Sampling and Final Round of Ground Water Sampling at Valley Alhambra Property, dated December 3, 2003. The only comment I have is with regard to analysis for VOCs. Due to the nature of this sampling event (confirmation sampling for site closure), VOCs should be analyzed in both soil and ground water by EPA Method 8260B. This analytical method covers a broader range of analytes, which is helpful information in determining if the site is eligible for closure. Other than this issue, everything else appears appropriate. Please let me know when you are planning on doing the proposed work so I can arrange my schedule to be there. Thanks, and let me know if you have any questions.

David A. Young
Engineering Geologist
Site Cleanup II
(213) 576-6744

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
***For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>

Exhibit F

From: Eddie Arslanian

Sent: Fri 1/16/2004 4:04 PM

To: 'Ju-Tseng Liu'; 'David Young'

Cc: Bita Tabatabai; George Linkletter

Subject: Valley-Alhambra: Confirmation Soil and Ground Water Sampling Results

Attachments:  [9065af3n Figure 3.pdf\(252KB\)](#)  [Table 1.xls\(32KB\)](#)  [Table 2.xls\(19KB\)](#)  [Table 3.xls\(19KB\)](#)  [Table 4.xls\(20KB\)](#)

[View As Web Page](#)

Gentlemen,

As mutually agreed in our meeting on November 18, 2003, ENVIRON conducted confirmation soil sampling and one final round of ground water sampling at the Site prior to the LARWQCB's issuance of a "No Further Action" designation for the site. The sampling activities were conducted to evaluate the presence of volatile organic compounds (VOCs), in addition to 1,4-dioxane, 1,2,3-trichloropropane (1,2,3-TCP), Title 22 metals, polychlorinated biphenyls (PCBs), and organochloride pesticides.

Ground Water Sample Results

Ground water sampling activities were conducted on December 18, 2003. In summary, VOC concentrations (PCE, TCE, cis-1,2-DCE) were consistent or lower than concentrations measured in prior quarters. Detected Title 22 metal concentrations were indicative of background concentrations and below California Maximum Contaminant Levels. Concentrations of 1,4-dioxane, 1,2,3-TCP, PCBs, and organochloride pesticides were not found above their respective laboratory reporting limits (RLs). Table 1 includes historical and recent results of VOCs found in ground water. Table 2 includes detected Title 22 dissolved metals found in ground water.

Soil Sample Results

Confirmation soil sampling activities were conducted on December 22, 2003 and January 6, 2004. The attached figure shows the locations of the confirmation soil samples approved by the LARWQCB, ESB-1 and ESB-2. PCE was found at concentrations ranging from below laboratory RLs of 4 micrograms per kilogram (ug/kg) to 140 ug/kg at ESB1-10'. The concentration of PCE at ESB1-12 was lower at 37 ug/kg. Other VOCs detected included toluene at up to 320 ug/kg, ethylbenzene up to 19 ug/kg, and xylenes up to 108 ug/kg. Detected Title 22 metal concentrations were indicative of background concentrations. Concentrations of 1,4-dioxane, 1,2,3-TCP, PCBs, and organochloride pesticides were not found above their respective laboratory RLs. Table 2 summarizes the analytical data for soil samples.

Based on the results of the soil and ground water samples presented herein, ENVIRON recommends that the LARWQCB issue a "No Further Action" designation for the site. We will submit a full report including all laboratory analytical results, data validation reports, and figures within the next couple of week.

Upon receiving your verbal authorization, ENVIRON will remove the remediation equipment and abandon the wells from the site. Furthermore, ENVIRON will assist the LARWQCB with preparation of the Site Closure Form.

Thank you.

<<9065af3n Figure 3.pdf>> <<Table 1.xls>> <<Table 2.xls>> <<Table 3.xls>> <<Table 4.xls>>

Eddie Arslanian, P.E.
ENVIRON International Corporation

707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

<<9065af3n Figure 3.pdf>> <<Table 1.xls>> <<Table 2.xls>> <<Table 3.xls>> <<Table
4.xls>>

Exhibit G

From: Eddie Arslanian
Sent: Wednesday, February 11, 2004 11:31 AM
To: 'Ju-Tseng Liu'; 'David Young'
Cc: Bitu Tabatabai; George Linkletter
Subject: Status on 4900 Valley Boulevard

Gentlemen,

We would like to inquire about the status of the "No Further Action" request for the site.

Could you please inform us as to when we can expect to receive a response from the Regional Board? Our client and the existing tenant at the site are eager to remove the remediation equipment and restore the site.

Thank you.

Eddie Arslanian, P.E.

ENVIRON International Corporation

707 Wilshire Boulevard, Suite 4950

Los Angeles, California 90017

Tel: 213.943.6326

Fax: 213.943.6301

From: Eddie Arslanian
To: David Young; 'Ju-Tseng Liu'
Cc: George Linkletter; Bitu Tabatabai
Subject: RE: Valley Alhambra Closure

Sent: Thu 3/25/2004 6:55 PM

Attachments:  Case review form.doc(59KB)

[View As Web Page](#)

Gentlemen,

Attached for your review, please find the closure form. If you have any questions, please contact me.

-----Original Message-----

From: David Young [<mailto:dyoung@rb4.swrcb.ca.gov>]
Sent: Tuesday, February 24, 2004 10:55 AM
To: Eddie Arslanian
Cc: Ju-Tseng Liu
Subject: Valley Alhambra Closure

Hi Eddie. After talking with management about this case we need the following to be completed:

- 1) A closure report that summarizes assessment/remediation at the site with a section addressing confirmation sampling results (soil/water). Within this section provide justification of why it is acceptable to leave 140 ug/kg in soil @ 10 ft bgs. Feel free to include any other pertinent information that would support closing this case.
- 2) Submit a case review form (attached) electronically for the Regional Board to review/edit.
- 3) Submit 2 hard copies of the closure report as well as an electronic copy, which you can send to my email address (dyoung@rb4.swrcb.ca.gov).

Thanks, and call me if you have any questions at (213) 576-6744.

David A. Young
Engineering Geologist
Site Cleanup II

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption

***For a list of simple ways to reduce demand and cut your energy costs, see the tips at:
<http://www.swrcb.ca.gov/news/echallenge.html> ***

<<Case review form.doc>>

Exhibit I

From: [Ju-Tseng Liu \[JLIU@rb4.swrcb.ca.gov\]](mailto:JLIU@rb4.swrcb.ca.gov)

Sent: Wed 6/30/2004 2:07 PM

To: [Eddie Arslanian](#)

Cc: [David Young](#)

Subject: RE: Closure Review for Valley Alhambra

Attachments:

[View As Web Page](#)

**** Reply Requested When Convenient ****

Hi Eddie:

Thanks for the email. I have talked with Dave today and he has begun working on the NFA for Valley Alhambra. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 06/30/04 12:59PM >>>
Hello David,

Can you provide me an update on this?

THanks.

-----Original Message-----

From: Ju-Tseng Liu [<mailto:JLIU@rb4.swrcb.ca.gov>]
Sent: Wednesday, June 16, 2004 2:02 PM
To: Eddie Arslanian
Cc: David Young
Subject: RE: Review of NFA Forms for two sites

**** Reply Requested When Convenient ****

Hi Eddie:

Thanks for your email. Dave Young is now working on another priority brownfield site closure. I will ask Dave to give you a call to provide an update to you. Take care. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EArslanian@environcorp.com> 06/15/04 09:36AM >>>
JT, thank you for your expedited review of the West Valley Cleaners NFA form.

I still haven't heard from David Young on the Valley Alhambra form. Could you please give us an update?
We would like to move forward with well abandonment activities to completely get out of the way of the
new tenant at the site.

Thanks in advance.

-----Original Message-----

From: Ju-Tseng Liu [mailto:JLIU@rb4.swrcb.ca.gov]
Sent: Tuesday, May 25, 2004 11:53 AM
To: Eddie Arslanian
Cc: Arthur Heath; David Young
Subject: Re: Review of NFA Forms for two sites

** Reply Requested When Convenient **

Eddie:

Thanks for your email. We are making some minor revisions of the closure letter for West Valley Cleaners
and will submit the closure packet to upper management for approval tomorrow.

I will ask Dave Young to give you an update on Valley Alhambra closure. Take care. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EArslanian@environcorp.com> 05/25/04 09:19AM >>>

> Dear JT,

>

> Could you please give me an update on the review status for the following sites?

>

> * SLIC No. 1006 (West Valley Cleaners, a.k.a., Tampa Vanowen Shopping Center): Dr. Arthur Heath
informed us last week that he submitted the NFA package to you for review.

>

> * SLIC No. 967 (Valley-Alhambra): We sent the NFA package to you and David Young on March 25,
2004. I have followed up with David Young on a couple of occasions but I think he's been pretty busy.

>

> Please call me at 213-943-6326 if you have any questions. Thank you

>

>

>

>

>

> Eddie Arslanian, P.E.

> ENVIRON International Corporation

> 707 Wilshire Boulevard, Suite 4950

Exhibit J

From: Eddie Arslanian

Sent: Tue 8/10/2004 9:19 AM

To: 'David Young'

Cc: Bita Tabatabai

Subject: Valley-Alhambra: Site History for NFA Form

Attachments:

[View As Web Page](#)

David, I received your voice message. Below, I have included a section on site history you can use for the closure form. It is an excerpt taken from our Interim Remedial Action Plan document dated April 30, 2001.

Can you please give us your timeframe for finalizing the forms? Thanks.

1.1 Site Description and History

The Site is located at 4900 East Valley Boulevard, Los Angeles, California in an industrial area of Los Angeles, California. North and south of the Site are manufacturing and distribution facilities, to the west is Valley Boulevard, and to the east are railroad tracks and industrial buildings.

From January 1972 to January 31, 1993, the Site was occupied by Harris Hub/Contract Metal Fabricators/Dresher, Inc. In 1990, Leggett and Platt purchased the business and continued the operation. Activities included receiving finished metal bed frames to be painted and assembled. As part of the painting process, two dip tanks and three USTs using paints was used (Figure 2). The three 750-gallon USTs were removed from the Site under the direction of the City of Los Angeles Fire Department (Fire Department). The subsurface investigations conducted during this time and subsequently are described in ENVIRON's Response to Request for Subsurface Site Assessment Work Plan dated April 30, 2001 (ENVIRON 2001c). Currently, the building is used as a warehouse for the storage of used garments by City Mission Industries, Inc. The warehouse operations since 1995 include sorting, pressing, bundling, and storage of the garments and various used furniture.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

Exhibit K

From: Eddie Arslanian

Sent: Tue 9/7/2004 9:04 AM

To: 'David Young'; 'Ju-Tseng Liu'

Cc: Bitu Tabatabai

Subject: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

From: [Ju-Tseng Liu \[jliu@rb4.swrcb.ca.gov\]](mailto:jliu@rb4.swrcb.ca.gov)

Sent: Wed 9/8/2004 10:52 AM

To: [Eddie Arslanian](#)

Cc: [David Young](#)

Subject: Re: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

**** Reply Requested When Convenient ****

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/07/04 09:05 AM >>>

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

From: Eddie Arslanian

Sent: Wed 9/8/2004 11:08 AM

To: 'Ju-Tseng Liu'

Cc: 'David Young'; Bitu Tabatabai

Subject: RE: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

thanks

-----Original Message-----

From: Ju-Tseng Liu [<mailto:jliu@rb4.swrcb.ca.gov>]

Sent: Wednesday, September 08, 2004 10:53 AM

To: Eddie Arslanian

Cc: David Young

Subject: Re: Valley-Alhambra: NFA Form

** Reply Requested When Convenient **

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/07/04 09:05 AM >>>

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326

Fax: 213.943.6301

Reply | Reply to all | Forward | X | Close | Help

From: Eddie Arslanian
To: 'Ju-Tseng Liu'
Cc: 'David Young'
Subject: RE: Valley-Alhambra: NFA Form
Attachments:

Sent: Fri 9/17/2004 4:00 PM

[View As Web Page](#)

JT and David, anything new on this front?

-----Original Message-----

From: Ju-Tseng Liu [mailto:jlui@rb4.swrcb.ca.gov]
Sent: Wednesday, September 08, 2004 10:53 AM
To: Eddie Arslanian
Cc: David Young
Subject: Re: Valley-Alhambra: NFA Form

** Reply Requested When Convenient **

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov
>>> "Eddie Arslanian" <EArslanian@environcorp.com> 09/07/04 09:05 AM >>>
Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

From: Eddie Arslanian

Sent: Tue 9/21/2004 9:57 AM

To: 'David Young'

Cc: 'Ju-Tseng Liu'; Bitu Tabatabai; George Linkletter

Subject: RE: Valley-Alhambra: NEA Form

Attachments:

[View As Web Page](#)

Thank you.

-----Original Message-----

From: David Young [<mailto:dyoung@rb4.swrcb.ca.gov>]
Sent: Tuesday, September 21, 2004 9:56 AM
To: Eddie Arslanian
Cc: Ju-Tseng Liu
Subject: RE: Valley-Alhambra: NFA Form

Hi Eddie. I apologize for the delays, but the closure package will be given to JT this week. Thanks, Dave Young

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/17/04 04:00PM >>>
JT and David, anything new on this front?

-----Original Message-----

From: Ju-Tseng Liu [<mailto:jliu@rb4.swrcb.ca.gov>]
Sent: Wednesday, September 08, 2004 10:53 AM
To: Eddie Arslanian
Cc: David Young
Subject: Re: Valley-Alhambra: NFA Form

** Reply Requested When Convenient **

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/07/04 09:05 AM >>>

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

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