

Appendix C

Public Comments

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Comments on the tentative orders for three Fairfield dry cleaner sites by the Water Board's advisory team.

All three tentative orders contain a statement regarding "Other Regional Water Board Policies," including the statement that Resolution 89-30 defines sources of drinking water to include all groundwater with limited exceptions for high TDS, low yield or naturally high contaminant levels. It would be helpful to specific in the tentative orders whether any of those conditions are present on the subject sites.

622-630 Jackson

- 1) Finding 8 refers to 712 Madison as Site #1. Since this is identified as Site #3 on the map, site identities should be made consistent.

625 Jackson

- 1) In the last paragraph of Finding 2, there is a reference to "Appleby-Stewart" who had an "unknown interest in the business" and an unknown relationship with the partnership. It is unclear what the alleged interest or relationship was and why she is mentioned at all – this should be clarified in both findings 2 and 3.
- 2) Under tasks 1 and 2, the tentative order states that the workplan and delineation of sources has been completed, but, in the last paragraph of Finding 6, it states that, "The extent of these contaminant plumes is currently unknown; data gaps remain." Without additional information, these are inconsistent statements and should be clarified.
- 3) As for 622-630 Jackson's tentative order, Finding 8 refers to 712 Madison as Site #1. Since this is identified as Site #3 on the map, site identities should be made consistent.

712 Madison

- 1) In Finding 6 (remedial investigation), there are several question marks after George Tomasini that imply this finding merits clarification.
- 2) Also in finding 6, there is a statement in its last paragraph that contaminant concentrations in a shallow lower zone well 100 feet from the site were lower – reported at 183 mg/L. Is it supposed to be ug/L?
- 3) As for 625 Jackson's tentative order, this tentative order initially states in the findings that the plume is not delineated and data gaps exist, but under tasks 1 and 2, Workplan and Completion of Source Delineation, it states "completed." That seems contradictory and merits additional information to clarify.



May 16, 2012

VIA E-MAIL

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Re: Comments on Tentative Order for 625 Jackson Street, Fairfield CA

Dear Messrs. Wolfe and Aue:

This office represents Ann Lewczyk, as personal representative of the Michael McInnis Revocable Trust and Robert Dittmer with respect to the environmental matters that have arisen with respect to Mr. McInnis and Mr. Dittmer's ownership of 625 Jackson Street, Fairfield, CA ("Site"). This office is in receipt of the Tentative Order issued as against my clients, by the California Regional Water Quality Control Board, San Francisco Bay Region, ("RWQCB"), with respect to the Site. Set forth below are my clients' comments to the Tentative Order. For ease of reference my clients' comments will be set forth after the enumerated headings. The enumerated headings, to which the following comments are applicable, are set forth below in the same manner in which they appear in the Tentative Order.

2. Site History:

The Tentative Order states: *"Dry cleaning operations were conducted at 625 Jackson Street for about 50 years beginning in the mid-1950's."*

"Jewell Hirsch was operating a dry cleaning business at the Site in 1965 when Robert Dittmer and Michael McInnis purchased the property from the Reid family."

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“Information currently available to the Regional Water Board indicates William Clarkson operated the dry cleaning business when it was first purchased by Jewel Hirsch in 1964.”

Deposition testimony and documentary evidence indicate that Fairfield Cleaners did not start dry cleaning operations at the Site until at least 1970 and that Mr. Clarkson never operated a dry cleaning business at the Site. Jewell Hirsch, according to deposition testimony, was not operating a dry cleaning business at the Site in 1965 when my clients purchased the Site from the Harris family. According to the deposition testimony of Ms. Hirsch, Fairfield Cleaners had operated as a laundry business and no dry cleaning was conducted at the Site until after she and her husband sold the business to the Trumbulls in 1970. Ms. Hirsch began to conduct dry cleaning operations at the Site after she purchased the business back from the Trumbulls in approximately 1975.

3. Named Dischargers

The Tentative Order fails to name operators Ms. Appleby Stewart, Ms. Hazard and/or Ms. Lawling as dischargers. It is believed that these individuals owned and operated a dry cleaning business at 625 Jackson Street for approximately one year. With respect to liability, there are no distinctions made, nor exceptions to, the liability imposed under the Water Code for liability related to an individual's length of ownership and/or length of operation of a business suspected of discharging pollutants. As such, Ms. Appleby Stewart, Ms. Hazard, and Ms. Lawling should all be named as dischargers.

6. Remedial Investigations

The Tentative Order indicates that there are “[D]iscontinuities in sewer lines have resulted in a release of contaminants to the environment.” It is unclear if this statement is merely a general statement regarding sewers in general or if this is a statement that is directed at the particular sewer lines at, and in the vicinity of the Site. This ambiguity should be clarified prior to the adoption any Order. If this statement is intended to reflect any of the conditions of any of the sewer lines (laterals and/or mains) at, or in the vicinity of the Site, the RWQCB should identify which sewer lines have discontinuities and provide the factual information on which this statement is based.

The Tentative Order presents an incomplete picture of the PCE distribution at and downgradient of the Site. The Tentative Order compares PCE concentrations in groundwater samples collected from Monitoring Wells MW-12 and MW-12I (located over 350 southeast of the Site) to concentrations detected at the Site for the proposition

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that the “contaminants are migrating vertically through the water-bearing strata and downgradient from the site.” The language in the Tentative Order goes on to point out that the concentrations of PCE in MW-12 in the most recent sampling event (at the time) was 677 µg/L and 2,190 µg/L in MW-12I. However, the Tentative Order fails to point out that, with respect to the intermediate water-bearing zone, there are two monitoring wells located downgradient of the Site, yet up-gradient of 12I in which PCE was not detected or detected at up to three orders-of-magnitude less than in MW-12I (i.e. MW-18I [3.4 µg/L] and MW-16I [not detected; <0.5 µg/L]). Further, the distribution of PCE concentrations in the intermediate water-bearing zone clearly reflect a PCE source area located to the east-southeast of the Site.

In addition to the contaminant distribution, hydrogeologic investigations conducted to date further support the conclusion that MW12 and MW12I are not the proper wells for the RWQCB to determine the downgradient extent of the contamination discovered at the Site. MW12 and MW12I are to the East of the Site and are cross gradient from the Site. In fact, MW12 and MW12I are downgradient of the 622 Jackson Site and not the 625 Jackson Site. Based upon the data collected to date, the RWQCB should not use MW12 and MW12I to assess the downgradient extent of the contamination from the Site as MW12 and MW12I are Not downgradient of the Site.

8. Adjacent Sites

The Tentative Order states: “Groundwater samples collected at these two locations [622-630 Jackson and 712 Madison] have been reported to contain VOCs, and Stoddard solvent has also been reported in soil and groundwater samples collected at 622-630 Jackson Street.

Any Order adopted by the RWQCB should reflect the fact that Stoddard solvent was also detected at 61 µg/L in a soil sample collected from the 712 Madison Site in May 2011.¹ As such, any Order adopted by the RWQCB should require the dischargers at 712 Madison and 622-630 Jackson to begin to analyze all samples for EPA analytical

¹ Only one sample collected from this Site has ever been analyzed by 8015. The one sample that was analyzed by 8015 revealed the presence of Stoddard solvent and also detected Mineral Oil at 60 µg/L. Currently, the consultants for the 712 Madison property are only performing 8260 analysis on all samples. Based upon the concentrations of Stoddard solvent and Mineral oil in the shallow soil at the 712 Site, any Order adopted by the RWQCB with respect to the 712 Site should require an 8015 analysis on all samples collected.

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method 8015 and EPA analytical method 8260 and to submit all chromatograms with the lab sheets at the time they submit their reports to the RWQCB.

B. TASKS

3. RISK EVALUATION AND REMEDIAL INVESTIGATION WORKPLAN

Based upon the work that has previously been accomplished for this Site, including the submission of the Site Conceptual Model ("SCM"), the RWQCB should please clarify what additional work is contemplated under this task. The previously submitted SCM evaluated site-specific human health risk and ecological risk, delineated and described the lateral and vertical extent of soil and groundwater pollution on and extending downgradient of the Site, and defined potential contaminant migration pathways. Any additional work required under this heading should be specifically set forth by the RWQCB with respect to this Site.

SELF MONITORING PROGRAM

2. Monitoring

The Tentative Order states: *"Groundwater samples from new wells in the shallow groundwater zone shall be analyzed by EPA Method 8260 and Method 8015, quantified as gasoline, diesel, Stoddard solvent, and motor oil unless otherwise directed by the Executive Officer. Groundwater samples from wells in the intermediate zone and deep zones shall be analyzed by EPA Method 8260."*


However, in the associated six columns Table, monitoring wells MW1I, MW12I, MW11I, and MW16I are all to be analyzed by EPA Method 8015. This inconsistency makes it difficult to comment upon this subject at this time. This inconsistency should be addressed by the RWQCB, prior to the adoption of any Order so that my clients have a fair and full opportunity to provide appropriate comments to any proposed requirements. Additionally, the Tentative Order identifies MW-14 and MW-14 does not exist. So, there are a total of 32 groundwater monitoring wells, of which 21 are shallow zone wells.

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Please do not hesitate to contact me if you have any questions regarding these comments to this Tentative Order.

Sincerely,

ISOLA LAW GROUP, LLP



Doyle Graham

DG/mdr



HUNT & JEPPESON^{LLP}

ATTORNEYS

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May 16, 2012

VIA E-MAIL

(Original will follow via U.S. Mail)

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Re: 625 Jackson St., Fairfield, California
Comments on Tentative Order – Site Cleanup Requirements

Dear Mr. Aue:

Our firm represents Obie Goins, Lucilla Hazard, Ray Johnson, and Judy Lawing in connection with the above-referenced matter. This letter is in response to Mr. Bruce Wolfe’s letter dated April 13, 2012 regarding the California Regional Water Quality Control Board – San Francisco Bay Region’s (the “Water Board”) proposed adoption of site cleanup requirements for the above-referenced property. For the reasons set forth in this letter, we respectfully request, on behalf of our clients, that that they not be named as dischargers. At the very least, we respectfully request that the Water Board exercise its discretion, in the interest of justice and fairness, and substantially limit their liability in this matter.

BACKGROUND

In order to understand our clients involvement, it is necessary to provide a brief background. Between 1965 and 2005, and possibly even earlier, the property was used as a cleaners. Based on the information we have to date, the following is a brief summary of who owned/operated Fairfield Cleaners during that timeframe:

<u>Date:</u>	<u>Operator</u>	<u>Owner</u>
1965 – 1970	Ruth V. Clarkson	Michael McInnis and Robert Dittmer
Short time in 1970	Ben and Jewel Hirsch	Michael McInnis and Robert Dittmer
1970 – 1975	William and Jean Trumbull	Michael McInnis and Robert Dittmer
1975 – 1980	Ben and Jewel Hirsch	Michael McInnis and Robert Dittmer
Short time b/t 1980 - 1981	John Blue, Obie Goins, and Ray Johnson	Michael McInnis and Robert Dittmer
1981 – 2005	Ben and Jewel Hirsch	Michael McInnis and Robert Dittmer

SACRAMENTO ■ WALNUT CREEK ■ SANTA CLARA

Our clients' connection to the property is extenuating to say the least. Sometime in or about 1980 (it appears to be around June 1980), Obie Goins, John Blue (now deceased), and Ray Johnson formed a partnership and purchased Fairfield Cleaners from Ben and Jewel Hirsch. As part of that transaction, my clients agreed to pay the purchase price to the Hirsch's in monthly payments over time.

John Blue's role in the partnership was to conduct the day-to-day operations of the cleaners. He was assisted by Lucilla Hazard's daughter (Obie Goins' stepdaughter) who was an employee. Mr. Goins and Mr. Johnson's role in the partnership were passive investors, business consultants, and they assisted in marketing. They were not involved in the day-to-day operations of the cleaners; they had other jobs. They have no knowledge of the chemicals stored, used, handled, produced, recycled, or disposed at the property during the period of operation.

In her deposition testimony, Ms. Jewel Hirsch testifies that about four to five months after selling the business to my clients they stopped making the monthly payments to her because they could not afford them. She further testified that within two or three months after failing to receive payments she took the cleaners back from our clients.¹ Thus, our clients were associated with Fairfield Cleaners for a very short period of time - it appears to be somewhere between 6 months to a year – more than 30 years ago.

DISCUSSION

1. **There Is No Evidence That Our Clients Caused Or Permitted Any Hazardous Waste To Be Discharged Into The Waters Of The State.**

California Water Code section 13304 authorizes the Water Board to issue cleanup and abatement orders *only* to persons who have “*caused or permitted . . . waste to be discharged . . . into the waters of the state. . .*” In this case, there is no evidence that our clients caused or permitted waste to be discharged at the property.

As part of the lawsuit filed by Mr. McInnis and Mr. Dittmer in connection with the contamination, there have numerous depositions taken – including, specifically, the depositions of Robert Dittmer, Ben Hirsch, and Jewel Hirsch. These individuals have all testified that they never observed our clients spill dry cleaning chemicals at the property or dispose of dry cleaning chemicals at the property. They have further testified that they are not aware of any incidents of spills at the property during the time my clients owned Fairfield

¹ The evidence also shows that with respect to Ray Johnson his involvement may be even shorter than the others as it appears he may have relinquished all of his rights, title, and interest in the partnership to Obie Goins and John Blue prior to Ms. Hirsch taking back over the cleaners.

Cleaners. Unlike Ms. Hirsch, our clients were never cited by a governmental agency for violating hazardous waste regulations pertaining to the usage or storage of such waste.

In its tentative order, the Water Board indicates that the “former operator, John Blue, is a discharger because he operated the dry cleaning business during which time it was common industry practice to use and dispose of PCE on-site.” Even though it may have been common industry practice to dispose of PCE on-site, that does not mean my clients disposed of it on-site, let alone in an unlawful or negligent manner. Such a conclusion is pure speculation and is contrary to the evidence as set forth above.

There simply were never any spills of contamination, and there is no evidence of any, during the very short time my clients operated Fairfield Cleaners.

2. **Our Clients Were Not Involved In The Operations Of Fairfield Cleaners.**

There is no evidence that connects our clients to contributing to the contamination other than their sole interest as passive investors in a partnership that owned Fairfield Cleaners. That is not enough. They were not involved in the day-to-day operations of the cleaners.

In *City of Modesto Redevelopment Agency v. Superior Court*, the Court, in reference to Water Code section 13304, explained that “the Legislature **did not intend** the act **to impose liability** on those with no ownership or control over the property or the discharge, and **whose involvement** in a discharge was **remote or passive.**” (*City of Modesto Redevelopment Agency v. Superior Court* (1st Dist. 2004) 119 Cal. App. 4th 28, 43; emphasis added.) The Court further explains that “[p]ersons who had **no active involvement** in activities leading to a discharge do not appear” to be held liable under that law. (*Id.*; emphasis added.) Mere partial ownership in a cleaners does not equate to causing or permitting hazardous waste to be discharged into California’s waterways.

In order to “cause or permit” waste to be discharged, there must be intent or some affirmative act taken to do so. Agreeing with the *City of Modesto* case, the Ninth Circuit Court of Appeals in *Redevelopment Agency of the City of Stockton v. BNSF Railway Company* also recently concluded that “the words ‘causes or permits’ within section 13304 were not intended ‘to encompass those whose involvement with a spill was remote and passive.’” (*Redevelopment Agency of the City of Stockton v. BNSF Railway Company* (9th Cir. 2011) 643 F. 3d 668, 677 – 678.) The court further explains that “[t]hose who took **affirmative steps** directed toward the improper discharge of [hazardous] wastes . . . may be liable under [section 13304]. . .” (*Id.* at 678.) Our clients involvement with any spills or discharges at the property was not only remote but it was non-existent as set forth above. They did not take any actions to “cause or permit” waste to be discharged at the property

and, in fact, they have no knowledge of the chemicals stored, used, handled, produced, recycled, or disposed during the period of operation.

In its tentative order the Water Board seeks to hold my clients responsible, under a partnership theory, for the alleged acts of John Blue. In its order the Water Board states that “John Blue acted in the ordinary course of the business of the partnership in operating the dry cleaners and *discharging waste* such that the partnership is liable for the injury caused by his acts. . .” (Emphasis added.) That is an inaccurate conclusion. The Water Board is making an implicit finding that John Blue discharged waste at the property causing injury – however, as set forth above, no such evidence exists that John Blue discharged waste at the property. The Water Board’s tentative decision is arbitrary and unsupported by any evidence in the record, let alone substantial evidence.

3. Equitable Considerations Require That Our Clients Not Be Named As Dischargers.

Besides the foregoing, equitable considerations require that our clients not be named as dischargers in the cleanup orders. At the very least, equitable considerations require that the Water Board substantially limit our clients liability.

Our clients are elderly and have a very limited finite amount of financial resources – certainly, nowhere remotely close to the amount required to cleanup the contamination. Fortunately, they were able to locate a Certificate of Insurance evidencing that they may have had insurance at the time. However, no insurance policy has been located. Based on the Certificate and other secondary evidence, Farmers Insurance has agreed to provide them coverage for the moment under a reservation of rights. However, they only have \$50,000 worth of coverage.

Their alleged liability in this case came as a complete shock to them and at great mental anguish and stress. They were trying to enjoy the twilight years of their life when this case came about. It has thrown them for a loop. The events transpired more than 30 years ago and they owned the cleaners for maybe 6 months to a year. The cleaners as a whole operated for at least 40 years. Our clients involvement is extremely small, if not insignificant, in proportion to Hirschs’, Mr. Dittmer’s, and Mr. McInnis involvement. In one way or another, these parties were associated with the property and/or cleaners between 1965 and 2005.

We appreciate your consideration of our comments and respectfully request, on behalf of our clients, that they not be named as dischargers. At the very least, we respectfully request that the Board exercise its discretion, in the interest of justice and fairness, and substantially limit their liability in this matter.

It has been a pleasure working with you and we appreciate your professionalism. We look forward to a successful resolution. If you need additional information or have any questions about our comments, please feel free to contact me.

Very truly yours,

HUNT & JEPPSON, LLP



Jeremy B. Price

JBP:ap

May 16, 2012

VIA EMAIL AND U.S. MAIL

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**RE: Jewel Hirsch's Comments on Tentative Order for 625 Jackson Street
in Fairfield, California**

Dear Mr. Aue:

We represent Jewel Hirsch ("Mrs. Hirsch") in the environmental matters concerning her operation at various times of the former Fairfield Cleaners in Fairfield, California. Thank you for providing us with this opportunity to comment on the San Francisco Bay Regional Water Quality Control Board's ("Regional Board") Tentative Order, New Site Cleanup Requirements for 625 Jackson Street dated April 13, 2012 ("Tentative Order"). The Regional Board also issued tentative orders on April 13, 2012 for two other properties in downtown Fairfield, 712 Madison Street (the "712 Madison Tentative Order") and 622-630 Jackson Street (the "622-630 Jackson Tentative Order") (collectively, with the Tentative Order for 625 Jackson Street, the "Tentative Orders").

On October 21, 2011, Mrs. Hirsch submitted comments on the Regional Board's review draft of the Tentative Order for 625 Jackson Street and 901-915 Texas Street, which was issued on October 12, 2011. On November 28, 2011, Mrs. Hirsch provided additional comments on the Tentative Orders issued on November 7, 2011. The RWQCB withdrew the 2011 Tentative Orders pending further investigation on December 1, 2011.

On April 13, 2012, the Regional Board re-issued the Tentative Orders, with revisions and additional fact allegations. Our comments on the Tentative Orders are included below. As discussed in more detail below, we object to the Tentative Order naming Mrs. Hirsch for the following reasons:

- The RWQCB has not met its burden to demonstrate that Mrs. Hirsch caused or permitted waste to be discharged into the waters of the state as required by Water Code section 13304 for issuance of the Tentative Order;
- Currently-available data demonstrates there are at least two significant sources of contamination in groundwater at the Site other than the 625 Jackson Street property where Fairfield Cleaners and Laundry ("Fairfield Cleaners") used to operate;
- Mrs. Hirsch is only potentially liable for contamination that the RWQCB can establish with substantial evidence was discharged into the waters of the state during her operation of Fairfield Cleaners; and,
- The Tentative Order requires Mrs. Hirsch to investigate and cleanup contamination which clearly is not attributable to her operation of Fairfield Cleaners.

Given the lack of evidentiary support for the Tentative Order as it pertains to Mrs. Hirsch and the potential impact of the Tentative Order if it is adopted on the ongoing related litigation in the Solano County Superior Court, Michael McInnis et al. v. Jewel Hirsch et al., Case No. FCS033636 (the "State Lawsuit"), we intend to notice the depositions of certain Regional Board employees with knowledge of the Regional Board's evidentiary bases for the Tentative Order. Mrs. Hirsch reserves all rights to supplement her comments after such depositions. We will also appear on behalf of Mrs. Hirsch at the Regional Board hearing currently scheduled for July 11, 2012. In the meantime, we are happy to meet with you to discuss any of these comments.

I. Introduction

Mrs. Hirsch worked at Fairfield Cleaners as an employee only beginning in approximately the mid-to-late 1960s. At that time, all dry cleaning for Fairfield Cleaners was performed off-site, near Travis Air Force Base. Dry cleaning was not performed on-site until around 1970, during the ownership of Gene and Ruth Trumbull. Contrary to the allegations in the Tentative Order, Mrs. Hirsch did not own the Fairfield Cleaners business during the time dry cleaning operations were performed on-site until 1975 at the earliest. Dry cleaning was performed on-site for approximately five years before Mrs. Hirsch owned Fairfield Cleaners.

Beginning in approximately 1975, Mrs. Hirsch owned and operated the Fairfield Cleaners business on property leased from the property owners, Robert Dittmer and Michael McInnis (deceased) (the "Property Owners"), at 625 Jackson Street in downtown Fairfield, California. Mrs. Hirsch continued to own the Fairfield Cleaners

business until approximately 2004, with the exception of the period between 1980 and 1981, when Obie Goins and his partners owned the Fairfield Cleaners business. In addition, dry cleaning was not performed at 625 Jackson Street for several years in the 1990s when it was performed at another location in Fairfield instead.

In 2000, perchloroethylene (“PCE”) and its breakdown products, trichloroethene (“TCE”), dichloroethene (“cis-1,2-DCE”) and vinyl chloride (“VC”), and other chemicals of concern (collectively, “COCs”), including but not limited to total petroleum hydrocarbons (“TPH”) and Stoddard solvent, were identified in soil and groundwater in downtown Fairfield in the vicinity of 625 Jackson Street, 622-630 Jackson Street, 712 Madison Street and 901-905 Texas Street (collectively, the “Site”). The Property Owners have been performing investigation of COCs at and near the Site under the review of the Regional Board since 2000. This investigation and the analytical data obtained during property inspections performed in 2011 as part of the State Lawsuit clearly indicates there are three or more contributing sources of COCs identified at the Site. A diagram depicting the locations of these four properties is attached as Figure 1.

On April 13, 2012, the Regional Board issued Tentative Orders for 625 Jackson Street, 622-630 Jackson Street and 712 Madison Street to a number of potentially responsible parties (“PRPs”) for each property. If made final, the Tentative Orders would require the PRPs to investigate and cleanup groundwater contamination at the Site, under the schedule for compliance indicated by the Regional Board. Each of the Tentative Orders allege facts to support each PRP’s purported “discharger” liability.

Although currently-available evidence demonstrates there is some (low-level) PCE in shallow groundwater down-gradient of the 625 Jackson Street property, the Tentative Order does not provide substantial evidence that the presence of any such PCE is the result of discharges by Mrs. Hirsch or any of her employees, rather than by any of the other persons performing dry cleaning at Fairfield Cleaners (or for that matter, from any of the other contributing sources, as discussed below). Rather, the Tentative Order provides only that Mrs. Hirsch is “named as a discharger because she operated Fairfield Cleaners for almost 30 years, during which time pollutants were discharged. She discharged waste in the form of PCE during her operations at the Site. It was the common industry practice during her operations to use and dispose of PCE on-site.” (Tentative Order at 2-3.) None of these allegations are supported by substantial evidence that PCE was discharged to the waters of the state during Mrs. Hirsch’s operations of Fairfield Cleaners.

In addition, even if there was a discharge to groundwater during Mrs. Hirsch’s operations at Fairfield Cleaners, the data available at this time indicates the property at 625 Jackson Street is a small contributor compared to the other contributing sources at 712 Madison Avenue and 622-630 Jackson Street, as well as another possible source

up-gradient of MW-2. Sampling results down-gradient of 712 Madison Street and 622-630 Jackson Street are indicative of one or more releases of PCE from each of those properties. Furthermore, there is no pathway by which Fairfield Cleaners could have caused the levels of PCE detected immediately down-gradient of 622-630 Jackson Street. Mrs. Hirsch cannot be held legally responsible to investigate and cleanup contamination she did not cause.

The Property Owners have spent more than ten years characterizing groundwater down-gradient from Fairfield Cleaners. The small shallow plume from the 625 Jackson Street property is adequately defined at this time. The additional investigation work being required of the PRPs for Fairfield Cleaners should instead be required of the other contributing sources.

II. The Tentative Order Does Not Demonstrate Substantial Evidence that Jewel Hirsch Caused or Permitted Waste to Be Discharged Into the Waters of the State

A. The Regional Board Must Demonstrate Substantial Evidence of a Discharge by Mrs. Hirsch

The Tentative Order against Mrs. Hirsch is issued pursuant to the Regional Board's authority under Water Code section 13304, which states, in part, that:

Any person . . . who has caused or permitted . . . waste to be discharged or deposited . . . into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the [R]egional [B]oard, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts.

Water Code § 13304(a) (emphasis added).

Under the language of the Water Code, therefore, the Regional Board must present evidence that Mrs. Hirsch "caused or permitted . . . waste to be discharged or deposited . . . into the waters of the state." Id. The standard by which the Regional Board must demonstrate that Mrs. Hirsch caused or permitted waste to be discharged into the waters of the state is "substantial evidence." In re Exxon Co., USA, et al., Order No. WQ 85-7, 1985 WL 1120860 at *6 (Cal. St. Wat. Res. Bd. 1985) (" . . . any findings made by an administrative agency in support of an action must be based on substantial evidence in the record"), citing Topanga Assn. for a Scenic Cmty. v. County of Los Angeles, 11 Cal.3d 506, 514 (1974). The Regional Board must have "substantial evidence to support a finding of responsibility for each party named. This means

credible and reasonable evidence which indicates the named party has responsibility.” Id.; see also In re Aluminum Co. of America, Order No. WQ 93-9, 1993 WL 13672991 at *3 (Cal. St. Wat. Res. Bd. 1993); In re Sanmina Corp. et al., Order No. WQ 93-14, 1993 WL 456494 at *2 (Cal. St. Wat. Res. Bd. 1993).

The State Water Resources Control Board (“State Board”) has determined that a key question in assigning responsibility for the cleanup and abatement of a release is whether the party caused or permitted it. See In re John Stuart, DBA Stuart Petroleum, Order No. WQ 86-15, 1986 WL 1210143 at *3 (Cal. St. Wat. Res. Bd. 1986). Mrs. Hirsch objects to issuance of the Tentative Order because there is a lack of substantial evidence in the record to support a finding of the required causal relationship between the alleged pollution and nuisance condition and the conduct of Mrs. Hirsch at Fairfield Cleaners. Mrs. Hirsch should not be required to cleanup a release which the Regional Board has no evidence she caused.

B. The Facts Alleged by the Regional Board Do Not Demonstrate Substantial Evidence of a Discharge of PCE by Mrs. Hirsch or Her Employees

The Regional Board has presented no substantial evidence in the Tentative Order that Mrs. Hirsch permitted, much less caused, any release from Fairfield Cleaners. The Tentative Order provides only that Mrs. Hirsch is “named as a discharger because she operated Fairfield Cleaners for almost 30 years, during which time pollutants were discharged. She discharged waste in the form of PCE during her operations at the Site. It was the common industry practice during her operations to use and dispose of PCE on-site.” (Tentative Order at 2-3.) There are no specific factual allegations as to any discharges of PCE during Mrs. Hirsch’s operations at Fairfield Cleaners.

In addition, the only facts developed in the State Lawsuit to date which potentially evidence any discharge at Fairfield Cleaners is that separator water from Fairfield Cleaners may have been released to the sewer. However, no evidence as to whether any such separator water actually contained PCE or whether it escaped from the sewer has been introduced by the Regional Board as part of the Tentative Orders.

Speculation is not evidence. See Roddenberry v. Roddenberry, 44 Cal. App. 4th 634, 651 (Cal. App. 1996). Possibility, speculation and conjecture are not sufficient proof. See id.; Regents of Univ. of California v. Pub. Emp’t Relations Bd., 220 Cal. App. 3d. 346, 359 (Cal. App. 1990). To constitute substantial evidence, “the evidence must be reasonable in nature, credible, and of solid value; it must actually be ‘substantial’ proof of the essentials which the law requires in a particular case.” Kasparian v. County of Los Angeles, 38 Cal. App. 4th 242, 259-60 (Cal. App. 1995) (internal citations omitted). Here, there was no contemporaneous sampling of the separator water at the

time of discharge to establish if it in fact contained any amount of PCE. There also has been no evidence presented which indicates the sewers were sampled and determined to be the sources of any releases. The mere existence of the possibility cannot meet the Regional Board's threshold of substantial evidence.

Regional Boards previously have upheld Cleanup and Abatement Orders on challenges to the causation requirement, finding substantial evidence where there were documented violations of discharge limits, where the Regional Board staff took soil and water samples which established the cause of contamination, where the contamination could only have resulted from the potentially responsible person's facilities because there was no other possible source, or where a Regional Board employee personally witnessed unlawful discharges. See In re Lloyd Walker et al., Order No. WQ 80-12, 1980 WL 590845 at *2 (Cal. St. Wat. Res. Bd. 1980); In re Atchinson, Topeka and Santa Fe Ry. Co., Order No. WQ 74-13, 1974 WL 353947 at *4 (Cal. St. Wat. Res. Bd. 1974); Machado v. State Water Res. Control Bd., 90 Cal. App. 4th 720, 727 (Cal. App. 2001). Here, the Regional Board has alleged no such direct proof as to Mrs. Hirsch. There are no documented spills of PCE during the operations of Mrs. Hirsch and no sampling of any waste water was conducted. Mrs. Hirsch "engaged in no active, affirmative or knowing conduct with regard to the passage of contamination . . . into the soil" or groundwater, "therefore [she] did not 'cause or permit' [a] discharge under section 13304." See Redevelopment Agency of City of Stockton v. BNSF Ry. Co., 643 F.3d 668, 678 (9th Cir. 2011).

C. The Regional Board Relies on Inaccurate and Incomplete Facts to Establish Mrs. Hirsch's Liability

A number of the alleged facts on which the Regional Board relies in the Tentative Order against Mrs. Hirsch are plain wrong. For example, the following are just some of the allegations of fact in the Tentative Order which are controverted by evidence obtained in the State Lawsuit and/or technical data gathered at the Site:

- Allegation: "Jewel Hirsch was operating a dry cleaning business at the Site in 1965 when Robert W. Dittmer and Michael L. McInnis purchased the property from the Reid family." (Tentative Order at 2.)
Fact: Jewel Hirsch did not own or operate an on-site dry cleaning business at the Site until 1975, at the earliest.
- Allegation: "The dry cleaning business at the Site changed owners and operators three times during the five decades it was in operation." (Tentative Order at 2.)
Fact: Fairfield Cleaners changed owners and operators at least six times. It was owned and/or operated by the Franks, Clarksons, Hirsches, Trumbulls, Hirsches, Goins and partners, Hirsches, and the Yoos. Evidence obtained in the State

Lawsuit indicates dry cleaning was not performed on-site until the operations of the Trumbulls, in 1970 at the earliest.

- Allegation: “Information currently available to the Regional ... Board indicates William Clarkson operated the dry cleaning business when it was first purchased by Jewel Hirsch in 1964.” (Tentative Order at 2.)
Fact: Jewel Hirsch did not own or operate an on-site dry cleaning business at the Site until 1975 at the earliest.
- Allegation: “Jewel Hirsch doing business as Fairfield Cleaners operated Fairfield Cleaners for most of the period from 1964 until 2004.” (Tentative Order at 2.)
Fact: Jewel Hirsch did not own or operate an on-site dry cleaning business at the Site until 1975, and she did not own and operate it continuously until 2004.
- Allegation: “Jewel Hirsch doing business as a Fairfield Cleaners is named as a discharger because she operated Fairfield Cleaners for almost 30 years, during which time pollutants were discharged. She discharged waste in the form of PCE during her operations at the Site.” (Tentative Order at 2-3.)
Fact: The Tentative Order does not provide any evidence or facts in support of the allegation that pollutants were discharged at Fairfield Cleaners during Jewel Hirsch’s operations.
- Allegation: “The most recent 2011 groundwater monitoring report for the Site indicates that contaminant plumes in shallow and intermediate groundwater zones extend offsite to the southeast. Groundwater samples from the farther downgradient shallow well (MW-12) approximately 350 feet from the site contained 677 micrograms per liter (ug/L, equivalent to parts per billion (ppb)), 57 ug/L TCE, and 60 ug/L DCE . . . These data indicate that these contaminants are migrating vertically through water-bearing strata and downgradient away from the Site.” (Tentative Order at 5.)
Fact: MW-12 is not down-gradient of 625 Jackson, and instead is immediately down-gradient of 622-630 Jackson. (See Figures 1 and 2.) The levels detected in MW-12 are indicative of a release from the 622-630 Jackson Street property, and not from 625 Jackson Street.
- Allegation: “Completion of Source Delineation . . . Completed.” (712 Madison Tentative Order at 8-9.)
Fact: No investigation or hot spot source identification has been performed inside or under the building at the 712 Madison Street property.
- Allegation: “While historical operations at the Site included the use and discharge of Stoddard solvent, it does not appear that PCE was used and discharged at the

Site.” (622-630 Jackson Tentative Order at 1.)

Fact: Only one witness to operations at the 622-630 Jackson Street property has been deposed in the State Lawsuit, and the witness did not know whether PCE was used at the property. (See Attachment 1, November 3, 2011 deposition of Scott Keilholtz.) In addition, as discussed below, high levels of PCE detected in MWs-12 and 15 indicate PCE was discharged at the 622-630 Jackson property.

- Allegation: “Currently available information indicates that Gillespie Cleaners used Stoddard solvent in their dry cleaning operations...” (622-630 Jackson Tentative Order at 2.)

Fact: At this time, there is little or no site-specific information about the chemicals used at Gillespie Cleaners. However, Site data indicates PCE was used at some point during the operations at 622-630 Jackson Street. PCE was detected at 670 ug/L in groundwater at 22.5 feet, adjacent to the building at 622-630 Jackson Street, and a release from 625 Jackson Street cannot be the cause. (See Attachment 2, Test America Report dated August 30, 2011.)

- Allegation: “Information provided in sworn depositions by the former operators of both Solano Printers and Fairfield Printing Company indicates that only alcohol-based cleaners were used in their operations . . . Consequently, neither Stoddard solvent nor VOCs were likely to be used as part of their business operations.” (622-630 Jackson Tentative Order at 2.)

Fact: Only one sworn deposition related to the 622-630 Jackson Street property has taken place in the State Lawsuit, and it did not relate to the operations of Fairfield Printing. (See Attachment 1 at 127, deposition of Scott Keilholtz dated November 2, 2011.) The Site data developed immediately down-gradient of 622-630 Jackson Street is indicative of a release of PCE at that property.

- Allegation: “[T]he 622-630 Jackson Street site [is] adjacent to a sanitary sewer line that serves both the 622-630 Jackson Street [and] the 625 Jackson Street properties.” (622-630 Jackson Tentative Order at 4.)

Fact: As discussed in detail below, the 8 inch sanitary sewer below Alley C does not serve both 625 Jackson Street and 622-630 Jackson Street, because it discharges into the sewer main under Jackson Street and does not continue east through to the other side of Jackson Street. (See Figure 1.)

The Regional Board’s adoption of inaccurate factual allegations in the Tentative Orders is particularly troubling because the Regional Board relies on these allegations to make conclusions about the potential liability of the PRPs named in the Tentative Orders. In addition, the parties to the State Lawsuit have relied on the Regional Board’s allegations in the Tentative Orders. All of the above factual inaccuracies should be corrected in any Final Orders.

There are a number of additional factual allegations which we do not address at this time; however, our silence as to any of these factual allegations should not be interpreted as acceptance of or any waiver of our right to challenge any such factual allegations moving forward.

III. The Tentative Orders Do Not Accurately Reflect that Properties Other than 625 Jackson Street Are The Cause Of Most of the Groundwater Contamination at the Site

The Tentative Order, if adopted, would require Mrs. Hirsch to investigate and cleanup COCs in groundwater that were not caused by any releases from Fairfield Cleaners. Instead, the available Site technical data establishes that at least two other properties have contributed significant amounts of COCs, particularly PCE, to groundwater at the Site. The Regional Board acknowledges in the Tentative Order that a “release of contaminants has been confirmed at all three of these locations [625 Jackson, 622-630 Jackson and 712 Madison]; however, the timing and quantity of these releases and the degree to which groundwater contaminant plumes from these properties may be commingled or may have impacted other properties has not been determined...” (Tentative Order at 6; see also 712 Madison Tentative Order at 5.) Figure 2, attached, depicts the suspected PCE plumes from each of the properties named in the Tentative Orders. Notwithstanding the existence of other contributing sources and the high levels of PCE detected immediately down-gradient of at least two of these properties, the Tentative Order would require Mrs. Hirsch to investigate up-gradient and cross-gradient groundwater conditions and clean up groundwater which was impacted by sources other than Fairfield Cleaners.

A. Currently-Available Data Establishes Up-gradient and Cross-gradient Properties are Significant Sources of PCE in Groundwater at the Site

1. THE 712 MADISON PROPERTY IS A SIGNIFICANT SOURCE OF PCE IN GROUNDWATER

On April 13, 2012, the Regional Board also issued a Tentative Order for 712 Madison Street, where Fairfield One Hour Cleaners formerly operated for more than 30 years. As the Regional Board recognized in the 712 Madison Tentative Order, soil and groundwater “in the vicinity of the former Fairfield One Hour Cleaners are significantly impacted” by PCE and other COCs. (712 Madison Tentative Order at 1.) As depicted on Figure 1, attached, the 712 Madison property is located up-gradient from Fairfield Cleaners. Since 2000, high levels of PCE detected in MW-3 during sampling indicated there was a contributing source up-gradient from the 901-905 Texas Street property and the 625 Jackson Street property. Levels of PCE in MW-3, which is down-gradient of the 712 Madison property, have been as high as 1,000 ug/L historically. However, it was not until sampling was performed at the 712 Madison property as part of the State

Lawsuit in 2011 that this was confirmed. Prior to 2011, the Regional Board never required any of the PRPs for the 712 Madison property to perform any investigation, despite repeated sampling results that were clearly indicative of a significant up-gradient source of PCE to groundwater.

Recently, the significant up-gradient source of contamination which had long been suspected was confirmed. High levels of PCE were detected in soil and groundwater in grab samples and monitoring well samples taken at and near the 712 Madison property. For example, PCE was detected at 38,000 ug/L in May 2011 in a grab sample taken at 20 feet at OHM-1, outside the back door at the property. (See Attachment 3, E₂C Preliminary Site Investigation Report of Findings, dated July 29, 2011.) The high levels of PCE detected are indicative of one or more discrete releases of PCE and are also indicative of the presence of DNAPL at the 712 Madison property. In addition, sworn testimony in the State Lawsuit evidences one or more spills of PCE occurred during deliveries of PCE to One Hour Cleaners. (See Attachment 4, deposition of Gerald Duensing dated June 10, 2011.)

Currently-available data indicates there are at least two separate areas where releases occurred at the 712 Madison property: in the rear of the building where One Hour Cleaners operated and at the sewer lateral. At this time, there has been no investigation performed within or below the actual building where dry cleaning was performed for over 30 years, in order to delineate the extent of impacts there, as has been required at 625 Jackson Street. Accordingly, we disagree with the Regional Board's conclusion that source delineation at the 712 Madison property has been completed. (See 712 Madison Tentative Order at 8.) Further delineation of the source should be required in order to identify the location of the hot spot source area(s).

In addition, the lateral and vertical extent of the plume(s) originating at the up-gradient 712 Madison Street property has not been fully characterized and it remains unclear to what extent it is impacting groundwater under and down-gradient of the 625 Jackson Street property, including in the intermediate groundwater zone. (See Figures 2, 3, 4 and 5.) The 712 Madison Tentative Order acknowledges contaminants from the 712 Madison property "are migrating vertically through water-bearing strata and down-gradient away from the Site," and "extend beyond the current monitoring well network." (712 Madison Tentative Order at 5.) Figures 2 and 3 demonstrate the unknown extent of the plume(s) originating at 712 Madison and also depict the significantly larger contribution which data suggests releases from the 712 Madison property have made to the groundwater contamination at the Site as a whole.

Despite the Regional Board's acknowledgment that COCs from the 712 Madison Street property have migrated down-gradient off the property, the 712 Madison Tentative Order only requires the PRPs to sample the wells installed in 2011 by E₂C, Mr.

Tomasini's consultant. At a minimum, MWs-3, 10, 10i and 10R should be associated with the 712 Madison Street property and the PRPs for the 625 Jackson Street property should not be required to sample these wells.

2. THE 622-630 JACKSON STREET PROPERTY IS A SIGNIFICANT SOURCE OF PCE IN GROUNDWATER

The Regional Board also issued a Tentative Order to some of the PRPs for the 622-630 Jackson Street property, where a number of businesses, including but not limited to Gillespie Cleaners, Singh Motors, Fairfield Printing and Solano Printers, all operated. The 622-630 Jackson Street property is located across Jackson Street to the east – cross-gradient (not down-gradient) – from 625 Jackson where Fairfield Cleaners used to operate. Mrs. Hirsch disagrees with a number of the allegations in the 622-630 Jackson Tentative Order, but agrees an order for the 622-630 Jackson property is warranted.

First, the Regional Board wrongly concludes the Alley C sewer is a potential pathway from 625 Jackson Street, west across Jackson Street, to the 622-630 Jackson Street property. Based on currently-available Site information, the sewer line along Alley C is not a potential pathway for PCE from Fairfield Cleaners to East of Jackson Street. As reflected in Figure 1, the 8 inch sanitary sewer under Alley C discharges into the sewer main underneath Jackson Street. In fact, the sewer line on the other side of the Jackson Street sewer main is plugged, as indicated in sewer video taken by the Property Owners in approximately 2009, as produced by the Property Owners in the State Lawsuit. (See also Attachment 5, GE&R Contributing Source Investigation dated March 20, 2008, at Figure 3.) The 8 inch sewer under Alley C is set at least several feet above the Jackson Street main sewer, so that it does not cross Jackson Street as the Regional Board alleges, but rather flows down into the main which then heads south underneath Jackson Street. Therefore, it is not true that the same “sanitary sewer line ... serves both the 622-630 Jackson Street [and] the 625 Jackson Street properties,” as alleged by the Regional Board. (622-630 Jackson Tentative Order at 4.) Fairfield Cleaners cannot be the source of PCE detected along the sewer near 622-630 Jackson Street.

Second, the Regional Board wrongly assumes “facts” about the former operations at the 622-630 Jackson Street property, which have no apparent basis as currently developed in the State Lawsuit. For example, the 622-630 Jackson Tentative Order finds that “while historical operations at the Site included the use and discharge of Stoddard solvent, it does not appear that PCE was used and discharged at the Site.” (622-630 Jackson Tentative Order at 1.) To the contrary, high levels of PCE detected in MWs-12 and 15 indicate PCE was discharged at the 622 Jackson property. At this time, there is limited knowledge of the operations at 622-630 Jackson Street, but based on

the operations of dry cleaners, printers and auto shops, it would not be unusual that PCE was used (and discharged) at the property. For example, letterpress and offset printing machines were both used during the operations of Fairfield Printing, and each of these machines commonly would have used VOCs in their inks and/or for cleaning.

The Regional Board also represents that “Information provided in sworn depositions by the former operators of both Solano Printers and Fairfield Printing Company indicates that only alcohol-based cleaners were used in their operations.” (622-630 Jackson Tentative Order at 2.) The only deposition to date in the State Lawsuit related to the former operations of the 622-630 Jackson Street property was the deposition of Scott Keilholtz, taken on November 3, 2011. Mr. Keilholtz was a former owner of the Solano Printers business but was only on the property approximately 6-12 times and was not involved in the day-to-day operations of the printers. Mr. Keilholtz had little knowledge about the actual operations of Solano Printers, and none about the operations of Fairfield Printing. (See Attachment 1, Deposition of Scott Keilholtz dated November 3, 2011.) Further, we understand that the former operators of Fairfield Printing, Jack Whalley and his wife, died in the 1990s. Therefore, unless the RWQCB is relying on depositions taken in other litigation, and not provided to the PRPs subject to the Tentative Orders, “sworn depositions by the former operators” at 622-630 Jackson simply do not exist.

The Regional Board relies on these false assumptions regarding the construction of the Alley C sewer and the prior operations at the 622-630 Jackson property to wrongly conclude the following:

The location of the soil, soil gas, and groundwater samples collected at this Site, together with laboratory analytical data for these samples, suggests that VOCs have been discharged near the Site, possible from the adjacent sanitary sewer line or a potential upgradient source. The absence of VOCs in soil, soil gas, and shallow groundwater samples adjacent to the building but away from the sewer suggests that VOCs were not discharged at this Site. The significant concentrations of Stoddard solvent reported in groundwater samples indicate that this contaminant was discharged at this Site. Investigation is needed to identify the source(s) of contamination, delineate contaminant pathways, identify and evaluate potential sensitive receptors, and characterize the vertical and lateral extent of contamination in soil and groundwater at the Site and downgradient of the Site.

(622-630 Jackson Tentative Order at 5, emphasis added.)

In 2011, groundwater samples taken from adjacent to the building at 622-630 Jackson revealed PCE at 670 ug/L in groundwater at 22.5 feet. (See Attachment 2, Test

America Report dated August 30, 2011) Historically, levels of PCE identified in MW-12 and MW-15 indicate a source of PCE emanating from a location north of these locations, which could not be associated with operations or potential releases from Fairfield Cleaners. MW-12 and 15 are not down-gradient of Fairfield Cleaners. (See Figure 2.) Instead, they are hydrogeologically down-gradient of the 622-630 Jackson Street property. The Regional Board's conclusion that MW-12 is down-gradient of Fairfield Cleaners is wrong.

In addition, the levels of PCE and breakdown products identified in MW-12 and MW-15 historically have been significantly higher than those identified immediately down-gradient of Fairfield Cleaners. This distribution also supports the conclusion that Fairfield Cleaners is not the source of those levels of PCE in groundwater. Instead, based on the levels of PCE from the grab sample(s) at the 622-630 Jackson property, the high levels in MW-12 and MW-15, and the construction of the sewer system which would not result in any releases from Fairfield to the sewer system along the Alley C sewer east of Jackson Street, the data strongly suggests the 622-630 Jackson Street property is a discrete source of PCE at the Site. Indeed, Figures 2, 3 and 5 (attached) demonstrate the anticipated contributions of the 622-630 Jackson Street property to groundwater based on currently-available Site data.

At a minimum, the contamination detected in MWs-8, 11, 12, 13, 15 and 21 should be associated with the 622-630 Jackson Street property, rather than 625 Jackson where Fairfield Cleaners operated. In addition, levels detected in MWs-16 and 19 are more likely associated with 622-630 Jackson Street than with alleged releases from Fairfield Cleaners at 625 Jackson Street.

3. AN ADDITIONAL UP-GRADIENT SOURCE LIKELY EXISTS AS REFLECTED BY MW-2

Based on currently-available data, it appears very likely there is another source of PCE up-gradient from 625 Jackson Street, as evidenced by the levels of PCE and its breakdown products (specifically, high levels of Cis-1,2-DCE) in MW-2. It is unclear whether the levels seen in MW-2 are indicative of a release at the 901-905 Texas Street property or from another up-gradient source (possibly along the sewer main, to the north). It is clear, however, there is contamination impacting MW-2 that is not related in any way to releases from Fairfield Cleaners. Figure 4 depicts the plumes of Cis-1,2-DCE. Figures 3 and 4 both indicate that another source, clearly distinct from 625 Jackson Street, is impacting MW-2.

The source of the impacts detected at MW-2 remain unknown at this time. The prior Tentative Order for 625 Jackson Street (dated November 2011) contained allegations specifically pertaining to the former operations at the 901-905 Texas Street property, which no longer is included as part of the Tentative Order. The Regional

Board acknowledges that the 901-905 Jackson Street property “has been used for a variety of businesses over a period of many years, including a car dealership and a gasoline station with auto repair facilities,” and these businesses “may also have used VOCs and petroleum solvents to wash parts and clean equipment.” (Tentative Order at 2.) It also is possible MW-2 may be indicative of another up-gradient release(s) from the 712 Madison property, which could have entered the Jackson Street sewer main north of MW-2. Although the source of the COCs regularly detected at high levels in MW-2 is unclear, it is clear they are not related to the operations of Fairfield Cleaners and the PRPs for the Tentative Order should not be responsible for sampling MW-2, nor should they be required to perform further investigation or any cleanup up- or cross-gradient of the 625 Jackson Street property.

B. Any Contribution to PCE in Groundwater from Fairfield Cleaners was Minor in Comparison

Levels of PCE and breakdown products detected in soil and groundwater at and immediately down-gradient of the 625 Jackson Street property have been significantly lower than those detected both up-gradient and cross-gradient, which are more likely related to the other properties at issue in the Tentative Orders. As evidenced by the diagram of the total PCE equivalent plumes in Figure 3, the contribution from Fairfield Cleaners is at least an order of magnitude less than the contribution from releases arising from either 712 Madison or 622-630 Jackson. (See Figure 3, attached.) Further, as depicted in Figure 5, the contributions (if any) to the intermediate groundwater zone from Fairfield Cleaners had little or no impact on current groundwater conditions in the intermediate zone. Instead, it appears there only is a relatively small plume limited to the shallow groundwater zone which could possibly be associated with the 625 Jackson Street property.

As a result, the Regional Board’s finding that “Based on the high concentrations of the contaminants reported in groundwater samples from monitoring wells farthest from the Site, the contaminant plumes in the shallow and intermediate groundwater zones extend down-gradient beyond the current monitoring well network,” is not correct. (See Tentative Order at 5.) The high concentrations detected in the wells farthest down-gradient from the 625 Jackson Street property are those which should be associated with the 622-630 Jackson Street property. Likewise, the Regional Board’s conclusion that “Laboratory analytical reports for groundwater samples collected from these wells indicate that PCE, TCE, DCE and vinyl chloride are present in the shallow and intermediate zones at concentrations more than two orders of magnitude above California maximum contaminant levels for these contaminants,” should be associated with the 622-630 Jackson Street property as well. (See Tentative Order at 4-5.)

C. Groundwater Down-gradient from Fairfield Cleaners has been Sufficiently Characterized

The Property Owners of 625 Jackson Street have performed extensive investigation and monitoring of groundwater in the vicinity of the Site, including construction of monitoring wells down-gradient of the 625 Jackson property to characterize groundwater conditions in the shallow and intermediate zones. Down-gradient groundwater is adequately defined at this time to remediate any contribution from Fairfield Cleaners.

Based on the available Site data, there currently is no indication of a contribution from Fairfield Cleaners of PCE to the intermediate groundwater zone. Figure 5 demonstrates the distribution of PCE in the intermediate zone as indicated by current data. Further, the extent of PCE in shallow groundwater down-gradient of the 625 Jackson property has been adequately characterized, as evidenced by the fact that concentrations of PCE at MW-7 are at or below drinking water standards. This is reflected in Figure 2.

Finally, as discussed above, based on all available Site information, the PRPs for 625 Jackson Street should not be required to monitor wells which are up- or cross-gradient from the property, regardless of who originally installed the wells. Enough data has been generated to date to clearly establish Fairfield Cleaners is not the source of any COCs detected in the wells other than those hydrogeologically down-gradient of the 625 Jackson property – specifically, MWs-17 and 18. Future monitoring by the PRPs for 625 Jackson Street should be limited to MWs-17 and 18.

IV. Mrs. Hirsch is Not Jointly and Severally Liable Under the Water Code for Releases by Other PRPs

A. Water Code Section 13304 Liability is Not Joint and Several

California law imposes a general presumption against joint and several obligations unless there are express words to the contrary. See Civ. Code § 1431. In light of this presumption, the plain language of Water Code section 13304 imposes only a several obligation, because the text of Section 13304 requires the Regional Board to demonstrate that each responsible person caused or permitted, or threatens to cause or permit, waste to be deposited or discharged where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance. Water Code § 13304(a). Section 13304 further provides that each such responsible person “shall upon order of the regional board, clean up the waste or abate the effects of the waste . . .” Id. The language of Section 13304 does not require each responsible person to clean up and abate the waste caused by all other discharges or

dischargers that ever occurred at the Site. Thus, a several obligation under Water Code section 13304 is mandated by the conspicuous lack of text in that section making reference to or intention to impose a “joint and several” obligation. This interpretation of a several obligation, as opposed to one that is joint and several, is consistent with the policy adopted by the People of the State of California, as codified at Civil Code section 1431.1, viewing the imposition of joint and several liability as frequently inequitable and unjust.

B. Mrs. Hirsch is Not Potentially Responsible for Releases from 712 Madison Street, 622-630 Jackson Street or any Property other than 625 Jackson Street

The analytical data available at this time indicates one or more discharges occurred at 712 Madison Street and 622-630 Jackson Street. It also appears likely an additional source exists somewhere up-gradient of MW-2. It is undisputed that Mrs. Hirsch never owned or operated any business at any of those other properties and never discharged at those properties. Nonetheless, the Tentative Order would require Mrs. Hirsch to address groundwater contamination caused by discharges from other properties at the Site.

In the Tentative Order, the Regional Board makes a finding that Mrs. Hirsch is a “discharger” because “she operated Fairfield Cleaners for almost 30 years, during which time pollutants were discharged. She discharged waste in the form of PCE during her operations at the Site. It was the common industry practice during her operations to use and dispose of PCE on-site.” (Tentative Order at 2-3.) While the Tentative Order itself acknowledges Water Code section 13304 authorizes the Regional Board to order a discharger to clean up waste which the discharger “has caused or permitted . . . to be discharged or deposited . . .”, the Tentative Order nonetheless orders Mrs. Hirsch to investigate and cleanup contamination in groundwater caused by releases from other persons at other properties. Failure to comply with the Order if adopted would subject Mrs. Hirsch to enforcement action, including but not limited to civil liability and/or criminal liability. These requirements that Mrs. Hirsch perform investigation and cleanup of discharges of waste she did not cause or permit is contrary to the statutory language of the Water Code, as well as the public policy as enacted by the People of the State of California.

V. Conclusion

In light of the above, Mrs. Hirsch objects to the Regional Board’s finding that she is a discharger and its requirements that she investigate and cleanup discharges alleged to be from Fairfield Cleaners. Please be advised, we plan to appear on behalf of Mrs. Hirsch at the hearing on the Tentative Order scheduled for July 11, 2012.

Please also note that an absence of a comment in response to any fact or conclusion in the Tentative Orders should not be construed as an agreement or waiver as to any fact or conclusion. Mrs. Hirsch reserves her right to challenge any Cleanup and Abatement Order before the Regional Board or the State Board pursuant to Water Code section 13320 or other applicable law.

Please let us know if you have any questions about any of our comments on the Tentative Order. We would be happy to meet with you at your offices to discuss any questions and/or concerns. I can be reached at (925) 284-0840 or amcadam@hgnlaw.com.

Very truly yours,
Hunsucker Goodstein & Nelson PC



Allison E. McAdam

AEM:mdb

Enclosures:

Figures 1-5

Attachment 1: November 3, 2011 Deposition of Scott Keilholtz

Attachment 2: Test America Report, August 30, 2011

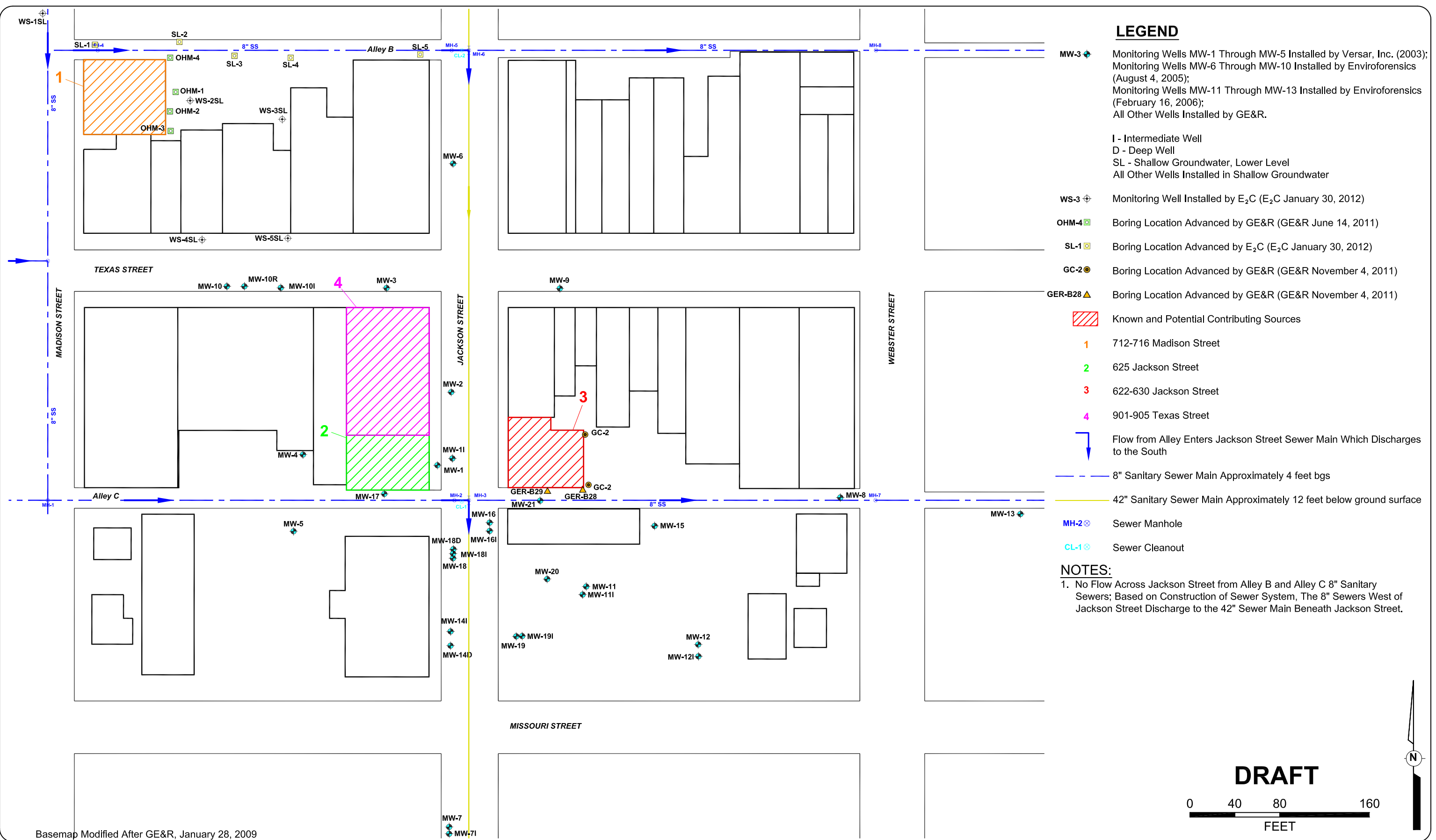
Attachment 3: E₂C Prelim. Site Investigation Report of Findings, July 29, 2011

Attachment 4: June 10, 2011 Deposition of Gerald Duensing

Attachment 5: GE&R Contributing Source Investigation, March 20, 2008, Figure 3

cc: Bruce H. Wolfe (via Email)
Jewel Hirsch

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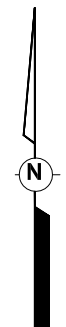
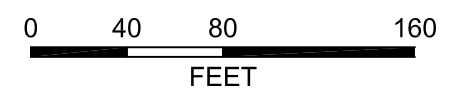
LEGEND

- MW-3 Monitoring Wells MW-1 Through MW-5 Installed by Versar, Inc. (2003); Monitoring Wells MW-6 Through MW-10 Installed by Enviroforensics (August 4, 2005); Monitoring Wells MW-11 Through MW-13 Installed by Enviroforensics (February 16, 2006); All Other Wells Installed by GE&R.
- I - Intermediate Well
- D - Deep Well
- SL - Shallow Groundwater, Lower Level
- All Other Wells Installed in Shallow Groundwater
- WS-3 Monitoring Well Installed by E₂C (E₂C January 30, 2012)
- OHM-4 Boring Location Advanced by GE&R (GE&R June 14, 2011)
- SL-1 Boring Location Advanced by E₂C (E₂C January 30, 2012)
- GC-2 Boring Location Advanced by GE&R (GE&R November 4, 2011)
- GER-B28 Boring Location Advanced by GE&R (GE&R November 4, 2011)
- Known and Potential Contributing Sources
- 1 712-716 Madison Street
- 2 625 Jackson Street
- 3 622-630 Jackson Street
- 4 901-905 Texas Street
- Flow from Alley Enters Jackson Street Sewer Main Which Discharges to the South
- 8" Sanitary Sewer Main Approximately 4 feet bgs
- 42" Sanitary Sewer Main Approximately 12 feet below ground surface
- MH-2 Sewer Manhole
- CL-1 Sewer Cleanout

NOTES:

1. No Flow Across Jackson Street from Alley B and Alley C 8" Sanitary Sewers; Based on Construction of Sewer System, The 8" Sewers West of Jackson Street Discharge to the 42" Sewer Main Beneath Jackson Street.

DRAFT



Basemap Modified After GE&R, January 28, 2009

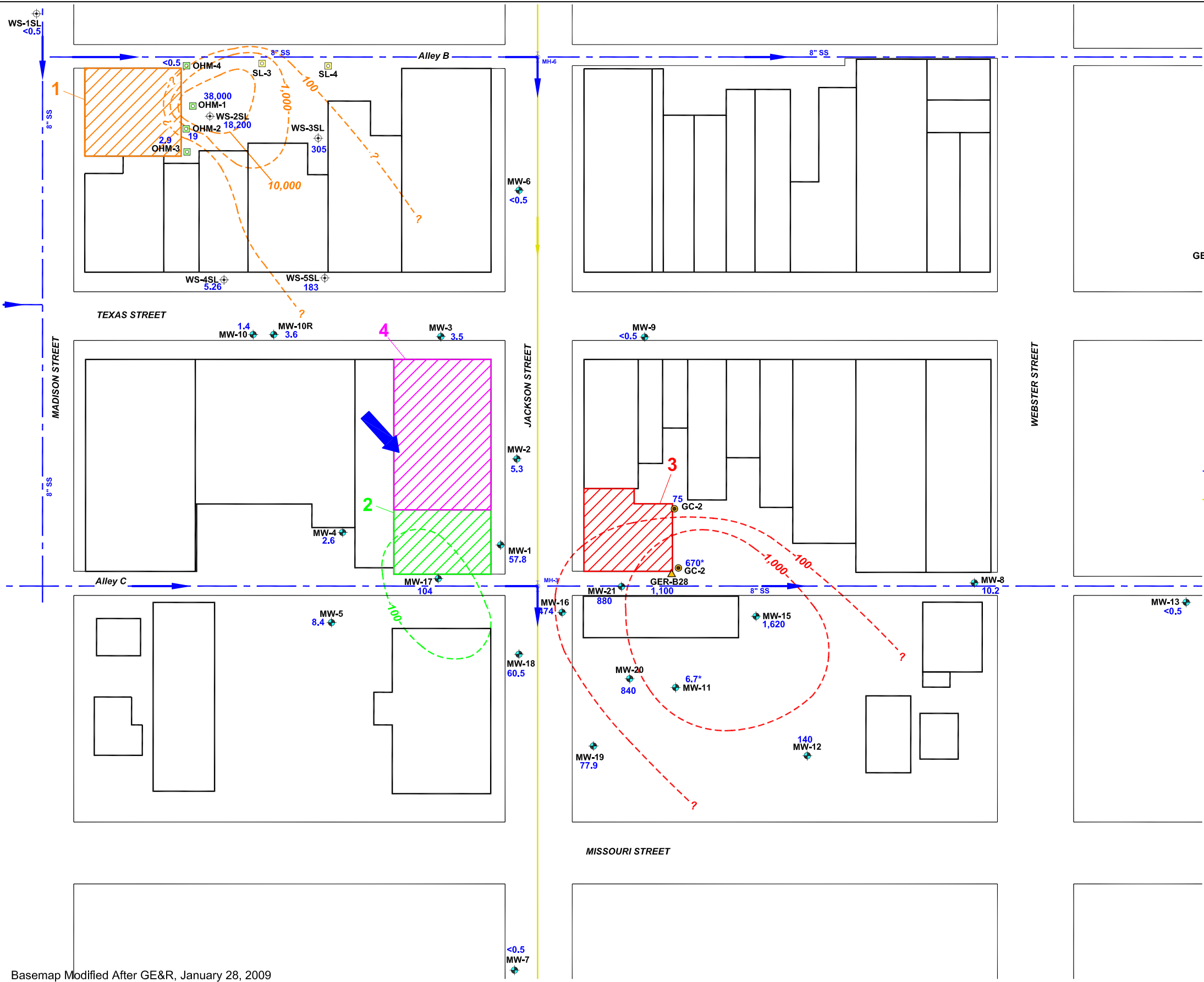


Date:	05/11/12
Designed:	SB
Drawn:	OS
Checked:	SB
DWG file:	Fig. 1

SITE PLAN
Conceptual Site Model
Fairfield, California

Figure	1
Project	812

E:\Conceptual Site Model\Figure 2 and 4 - PCE_1-2-DCE Shallow.dwg Layout: PCE May 11, 2012 - 2:07pm



LEGEND

- MW-3 Monitoring Wells MW-1 Through MW-5 Installed by Versar, Inc. (2003); Monitoring Wells MW-6 Through MW-10 Installed by Enviroforensics (August 4, 2005); Monitoring Wells MW-11 Through MW-13 Installed by Enviroforensics (February 16, 2006); All Other Wells Installed by GE&R.
- WS-3 Monitoring Well Installed by E₂C (E₂C January 30, 2012)
- OHM-4 Boring Location Advanced by GE&R (GE&R June 14, 2011)
- SL-1 Boring Location Advanced by E₂C (E₂C January 30, 2012)
- GC-2 Boring Location Advanced by GE&R (GE&R November 4, 2011)
- GER-B28 Boring Location Advanced by GE&R (GE&R November 4, 2011)
- Known and Potential Contributing Sources
- 1 712-716 Madison Street
- 2 625 Jackson Street
- 3 622-630 Jackson Street
- 4 901-905 Texas Street
- Flow from Alley Enters Jackson Street Sewer Main Which Discharges to the South
- 8" Sanitary Sewer Main Approximately 4 feet bgs
- 42" Sanitary Sewer Main Approximately 12 feet below ground surface
- PCE Concentration Contour, Dashed When Inferred and Queried Where Uncertain
- 880 PCE Concentration in Micrograms per Liter
- * Data Appear to be Anomalous Relative to the Adjacent Wells and Was Not Used for Contouring
- Approximate Groundwater Flow Direction

NOTES:

1. OHM-1, -2, -3, and -4 Sampled in May, 2011 (E₂C July 29, 2011).
2. WS-XX Monitoring Wells Sampled in November 2011 (E₂C January 30, 2012).
3. MW-XX Monitoring Wells Sampled in February 2012 (GE&R March 28, 2012).
4. GC-1 and GC-2 Were Sampled by GE&R in August 2011.
5. GER-B28 and GER-B29 Sampled in December 2010 (GE&R November 4, 2011).
6. No Flow Across Jackson Street from Alley B and Alley C 8" Sanitary Sewers; Based on Construction of Sewer System, The 8" Sewers West of Jackson Street Discharge to the 42" Sewer Main Beneath Jackson Street.
7. PCE - Tetrachloroethene.

DRAFT

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Basemap Modified After GE&R, January 28, 2009



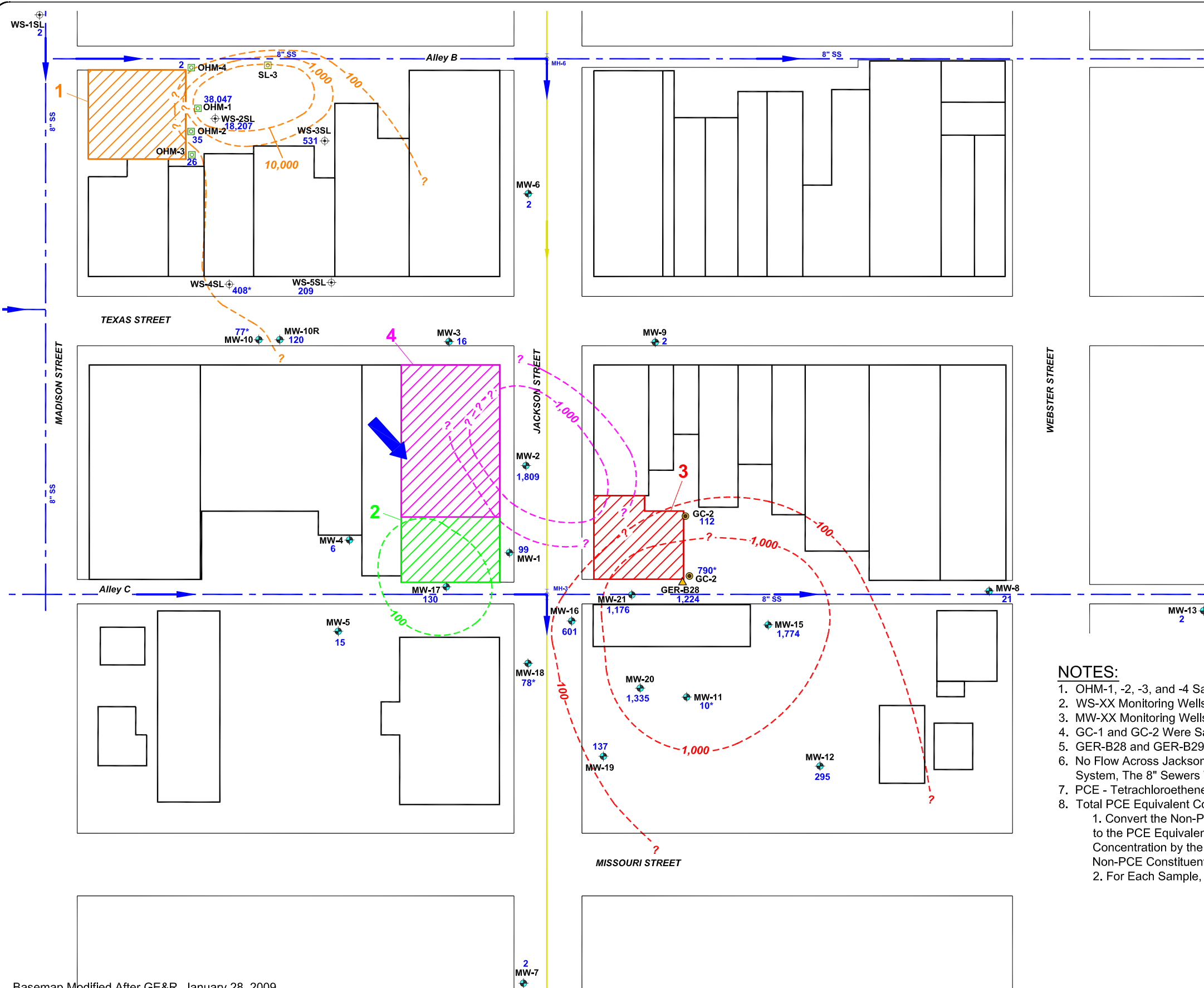
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Designed:	SB
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DWG file:	Fig. 2

PCE CONCENTRATION CONTOURS - SHALLOW GROUNDWATER

Conceptual Site Model
Fairfield, California

Figure	2
Project	812

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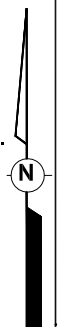
LEGEND

- MW-3 Monitoring Wells MW-1 Through MW-5 Installed by Versar, Inc. (2003); Monitoring Wells MW-6 Through MW-10 Installed by Enviroforensics (August 4, 2005); Monitoring Wells MW-11 Through MW-13 Installed by Enviroforensics (February 16, 2006); All Other Wells Installed by GE&R.
- WS-3 Monitoring Well Installed by E₂C (E₂C January 30, 2012)
- OHM-4 Boring Location Advanced by GE&R (GE&R June 14, 2011)
- SL-1 Boring Location Advanced by E₂C (E₂C January 30, 2012)
- GC-2 Boring Location Advanced by GE&R (GE&R November 4, 2011)
- GER-B28 Boring Location Advanced by GE&R (GE&R November 4, 2011)
- Known and Potential Contributing Sources
- 1 712-716 Madison Street
- 2 625 Jackson Street
- 3 622-630 Jackson Street
- 4 901-905 Texas Street
- Flow from Alley Enters Jackson Street Sewer Main Which Discharges to the South
- 8" Sanitary Sewer Main Approximately 4 feet bgs
- 42" Sanitary Sewer Main Approximately 12 feet below ground surface
- Total PCE Equivalent Concentration Contour, Dashed When Inferred and Queried Where Uncertain
- 1,774 PCE Concentration in Micrograms per Liter
- * Data Appear to be Anomalous Relative to the Adjacent Wells and Was Not Used for Contouring
- Approximate Groundwater Flow Direction

NOTES:

1. OHM-1, -2, -3, and -4 Sampled in May, 2011 (E₂C July 29, 2011).
2. WS-XX Monitoring Wells Sampled in November 2011 (E₂C January 30, 2012).
3. MW-XX Monitoring Wells Sampled in February 2012 (GE&R March 28, 2012).
4. GC-1 and GC-2 Were Sampled by GE&R in August 2011.
5. GER-B28 and GER-B29 Sampled in December 2010 (GE&R November 4, 2011).
6. No Flow Across Jackson Street from Alley B and Alley C 8" Sanitary Sewers; Based on Construction of Sewer System, The 8" Sewers West of Jackson Street Discharge to the 42" Sewer Main Beneath Jackson Street.
7. PCE - Tetrachloroethene.
8. Total PCE Equivalent Concentration Was Calculated As Follows:
 1. Convert the Non-PCE Constituent (TCE, cis-1,2-DCE, trans-1,2-DCE, 1,1-DCE and VC) Concentrations to the PCE Equivalent Concentration in Each Sample. That is Multiply the Non-PCE Constituent Concentration by the Molecular Weight of PCE and Divide by the Molecular Weight of the Respective Non-PCE Constituent.
 2. For Each Sample, Add the Calculated PCE Equivalent Concentrations to the Detected PCE Concentration.

DRAFT



Basemap Modified After GE&R, January 28, 2009



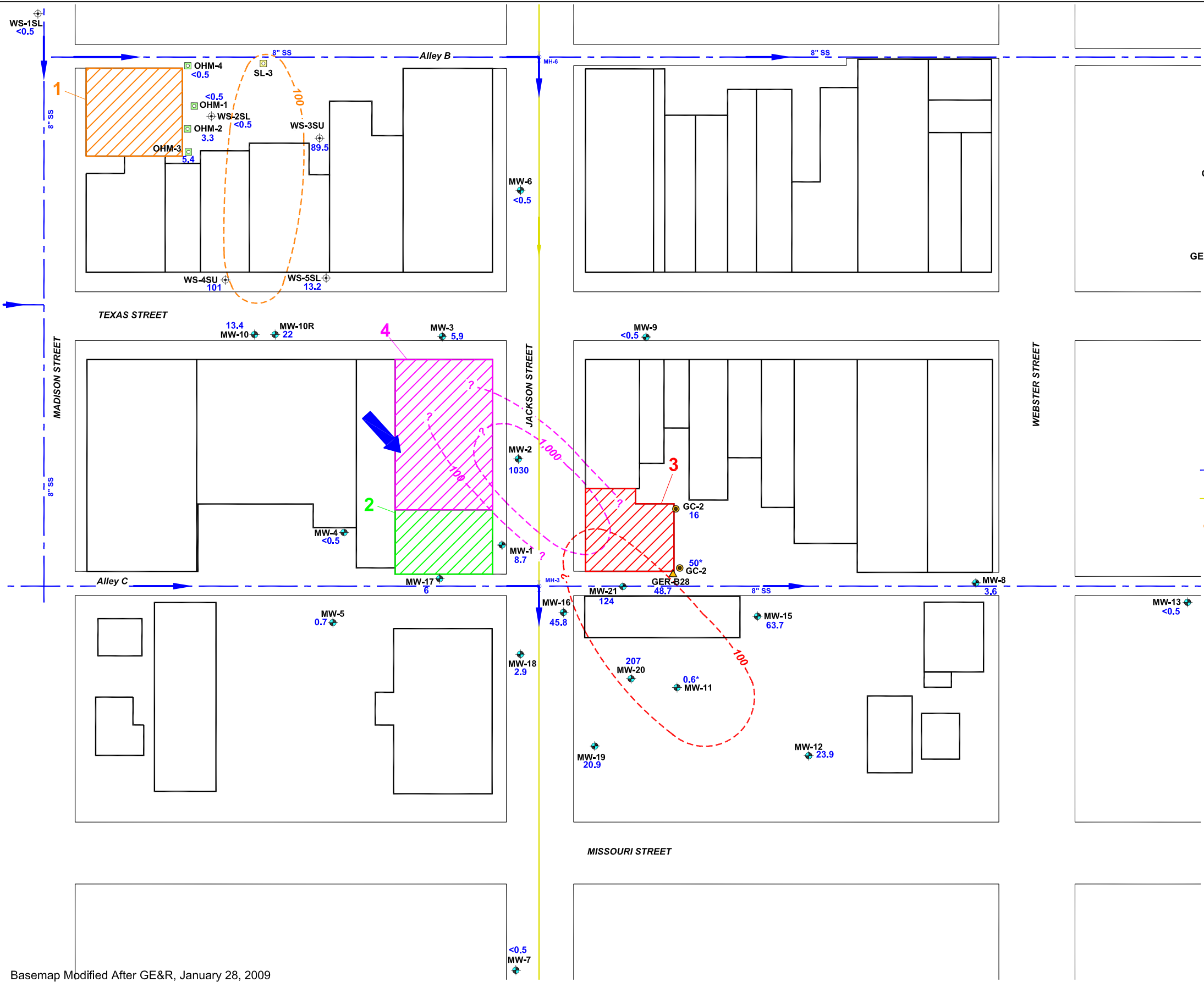
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DWG file:	Fig. 3

TOTAL PCE EQUIVALENT CONCENTRATION CONTOURS - SHALLOW GROUNDWATER

Conceptual Site Model
Fairfield, California

Figure	3
Project	812

C:\Work\EnviroCAD\GZA\Fairfield_Cleaners\Conceptual Site Model\Figure 2 and 4 - PCE, 1,2-DCE Shallow.dwg Layout: cis-1,2-DCE May 14, 2012 - 7:38pm



LEGEND

- MW-1 through MW-5: Monitoring Wells Installed by Versar, Inc. (2003);
- MW-6 through MW-10: Monitoring Wells Installed by Enviroforensics (August 4, 2005);
- MW-11 through MW-13: Monitoring Wells Installed by Enviroforensics (February 16, 2006);
- All Other Wells: Installed by GE&R.

- WS-3: Monitoring Well Installed by E₂C (E₂C January 30, 2012)
- OHM-4: Boring Location Advanced by GE&R (GE&R June 14, 2011)
- SL-1: Boring Location Advanced by E₂C (E₂C January 30, 2012)
- GC-2: Boring Location Advanced by GE&R (GE&R November 4, 2011)
- GER-B28: Boring Location Advanced by GE&R (GE&R November 4, 2011)

- [Red Hatched Box]: Known and Potential Contributing Sources
- 1: 712-716 Madison Street
- 2: 625 Jackson Street
- 3: 622-630 Jackson Street
- 4: 901-905 Texas Street
- [Blue Arrow]: Flow from Alley Enters Jackson Street Sewer Main Which Discharges to the South
- [Blue Dashed Line]: 8" Sanitary Sewer Main Approximately 4 feet bgs
- [Yellow Solid Line]: 42" Sanitary Sewer Main Approximately 12 feet below ground surface
- [Dashed Orange Line]: cis-1,2-DCE Concentration Contour, Dashed When Inferred and Queried Where Uncertain
- 207: cis-1,2-DCE Concentration in Micrograms per Liter
- *: Data Appear to be Anomalous Relative to the Adjacent Wells and Was Not Used for Contouring
- [Blue Arrow]: Approximate Groundwater Flow Direction

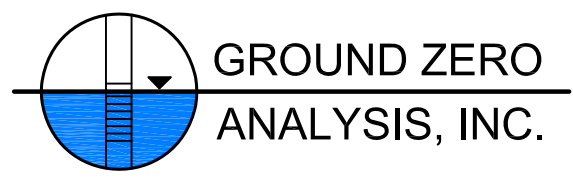
- ### NOTES:
1. OHM-1, -2, -3, and -4 Sampled in May, 2011 (E₂C July 29, 2011).
 2. WS-XX Monitoring Wells Sampled in November 2011 (E₂C January 30, 2012).
 3. MW-XX Monitoring Wells Sampled in February 2012 (GE&R March 28, 2012).
 4. GC-1 and GC-2 Were Sampled by GE&R in August 2011.
 5. GER-B28 and GER-B29 Sampled in December 2010 (GE&R November 4, 2011).
 6. No Flow Across Jackson Street from Alley B and Alley C 8" Sanitary Sewers; Based on Construction of Sewer System, The 8" Sewers West of Jackson Street Discharge to the 42" Sewer Main Beneath Jackson Street.
 7. cis-1,2-DCE - cis-1,2-Dichloroethene.

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Basemap Modified After GE&R, January 28, 2009



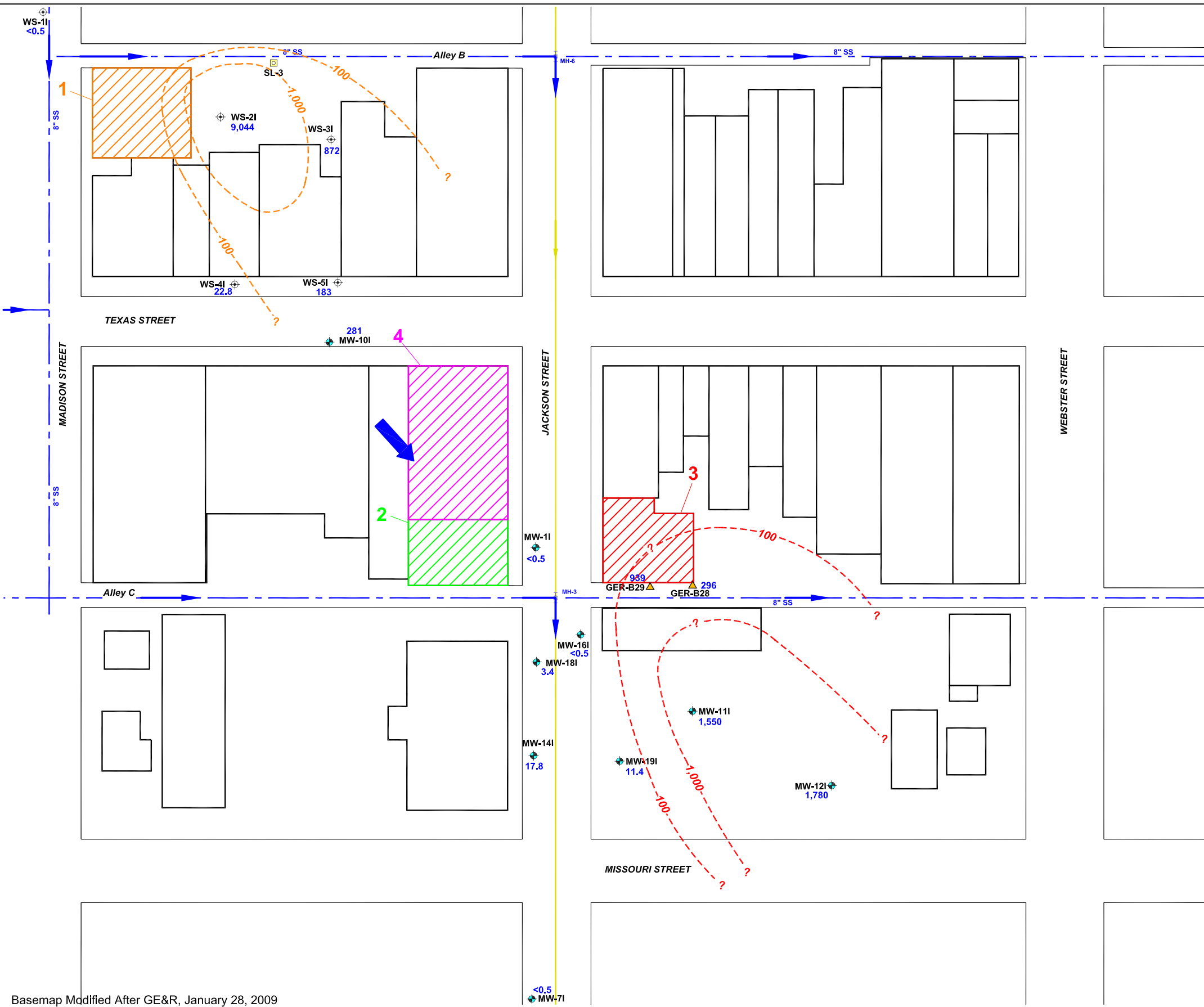
Date:	05/14/12
Designed:	SB
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Checked:	SB
DWG file:	Fig. 4

cis-1,2-DCE CONCENTRATION CONTOURS - SHALLOW GROUNDWATER

Conceptual Site Model
Fairfield, California

Figure	4
Project	812

C:\Work\EnviroCAD\GZA\Fairfield_Cleaners\Conceptual Site Model\Figure 5 - PCE Intermediate.dwg Layout: PCE May 14, 2012 - 10:55pm

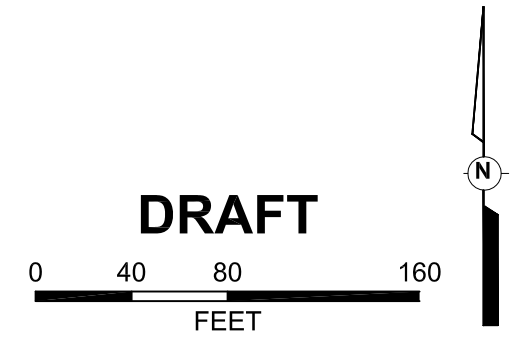


LEGEND

- MW-101 Monitoring Wells Installed by GE&R (GE&R July 2007, December 2009, and November 2011)
- WS-3 Monitoring Well Installed by E₂C (E₂C January 30, 2012)
- SL-1 Boring Location Advanced by E₂C (E₂C January 30, 2012)
- GER-B28 Boring Location Advanced by GE&R (GE&R November 4, 2011)
- Known and Potential Contributing Sources
- 1** 712-716 Madison Street
- 2** 625 Jackson Street
- 3** 622-630 Jackson Street
- 4** 901-905 Texas Street
- Flow from Alley Enters Jackson Street Sewer Main Which Discharges to the South
- 8" Sanitary Sewer Main Approximately 4 feet bgs
- 42" Sanitary Sewer Main Approximately 12 feet below ground surface
- PCE Concentration Contour, Dashed When Inferred and Queried Where Uncertain
- 281** PCE Concentration in Micrograms per Liter
- Approximate Groundwater Flow Direction

NOTES:

1. WS-XX Monitoring Wells Sampled in November 2011 (E₂C January 30, 2012).
2. MW-XX Monitoring Wells Sampled in February 2012 (GE&R March 28, 2012).
3. No Flow Across Jackson Street from Alley B and Alley C 8" Sanitary Sewers; Based on Construction of Sewer System, The 8" Sewers West of Jackson Street Discharge to the 42" Sewer Main Beneath Jackson Street.
4. PCE - Tetrachloroethene.



Basemap Modified After GE&R, January 28, 2009



Date:	05/14/12
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Drawn:	OS
Checked:	SB
DWG file:	Fig. 5

PCE CONCENTRATION CONTOURS - INTERMEDIATE GROUNDWATER

Conceptual Site Model
Fairfield, California

Figure	5
Project	812

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SOLANO

---oOo---

MICHAEL McINNIS and ROBERT)
DITTMER,)
)
)
) Plaintiffs,)
) Case No.
) FCS033636
)
) vs.)

JEWEL HIRSCH, individually and)
doing business as FAIRFIELD)
CLEANERS; RONALD W. WASLOHN; TERRY)
A. DUREE, INC., a corporation;)
STEPHEN C. SPENCER; RICHARD RAGLE;)
GEORGE J. TOMASINI, JR., in his)
own right and as trustee of the)
George J. Tomasini Trust; MARY)
ALICE BEDINGFIELD in her own right)
and as trustee of the Mary Alice)
Bedingfield Revocable Trust;)
ATTIEH ASSAD; and MUNIRA ASSAD,)
)
) Defendants.)

AND RELATED CROSS-CLAIMS.)
)

---oOo---

DEPOSITION OF SCOTT KEILHOLTZ

Thursday, November 3, 2011

Taken at the location of:

1107 Second Street, Suite 210
Sacramento, California 95814

---oOo---

Reported by Antonia Severson, CSR #3430

2

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2
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22 and WILLIAM L. BUTLER: (NOT PRESENT)
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5
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8 Napa, CA 94558

9 Other Persons Present:
10 SCOTT KEILHOLTZ, Deponent
11 Antonia Severson, Court Reporter

12 ---oOo---

6

1 I N D E X

2 Examination By Page

3 Mr. Graham 7

4 Ms. McAdam 134

5 Mr. Nickovich 139

6 Mr. Farrell 149

7 Mr. Graham 150

8

9 ---oOo---

10 E X H I B I T S

Number	Description	Page
11 1	12-page Deposition Subpoena For Personal Appearance and Production of Documents And Things	42
12 2	8-page 1961 City Directory	70
13 3	5-page Articles of Incorporation Of Solano Printers & Lithographers	73

14

15 ---oOo---

16

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8

1 Q. Okay. Do you recall if you've ever been

2 designated as an expert in a state court?

3 A. I don't believe so.

4 Q. Okay. Do you recall if you've ever been

5 designated as an expert in a federal court?

6 A. No, I don't believe so.

7 Q. Have you ever submitted any report, expert

8 report, to any state or federal court?

9 A. No.

10 Q. Okay. And of these half dozen times that you

11 were deposed, could you tell me of those half dozen

12 times how many, if any, involved your operations of a

13 printing shop?

14 A. They all did.

15 Q. They all did.

16 And could you just briefly break down for me

17 just the main issues of these six times that you were

18 deposed, previously?

19 A. I -- I really couldn't go into the detail. It

20 goes back -- the last time I was deposed was probably

21 around '97, and at the end of the Cal Central Press

22 there was a lot of litigation going on.

23 Q. Litigation with?

24 A. Creditors.

25 Q. And of the remaining times that you've been

7

1 B E I T R E M E M B E R E D, that pursuant to notice, and

2 on Thursday, November 3, 2011, commencing at the hour of

3 10:04 a.m., at the location of 1107 Second Street, Suite

4 210, Sacramento, California, before me, ANTONIA

5 SEVERSON, a Shorthand Reporter in and for the State of

6 California, there personally appeared:

7 SCOTT KEILHOLTZ,

8 Called as a witness herein, having been duly sworn to

9 tell the truth, the whole truth, and nothing but the

10 truth, testified as follows:

11 ---oOo---

12 E X A M I N A T I O N

13 BY MR. GRAHAM:

14 Q. Mr. Keilholtz, good morning. As I introduced

15 myself before, my name is Doyle Graham. I represent the

16 plaintiffs in this case.

17 I first want to ask you, have you ever had your

18 deposition taken before?

19 A. Yes, I have.

20 Q. On how many occasions?

21 A. Half a dozen at least.

22 Q. And of those half a dozen occasions where

23 you've given depositions, have you given any depositions

24 in capacity as an expert?

25 A. I don't recall.

9

1 previously deposed, have any of those issues revolved

2 around contamination?

3 A. No, never.

4 Q. Okay. Since it's been a little while since

5 your last deposition, I'll go over some of the kind of

6 basic ground rules for you.

7 Today is essentially a question-and-answer

8 session. I get to ask the questions first. Any of the

9 other counsel can ask questions.

10 Please wait till I'm done with my question. We

11 have a court reporter here taking down everything that

12 we say. Please wait till I'm done with my question

13 completely.

14 And by the same token, I'll wait for you to

15 completely answer your question before I pose the next

16 question.

17 Is that agreeable?

18 A. Uh-huh. Yes.

19 Q. Second thing, I do need verbal answers, a "yes"

20 and a "no," rather than an "uh-huh" or "huh-uh." If I

21 stop you and say, "Is that a 'yes,'" please don't think

22 I'm being rude.

23 A. I understand.

24 Q. I need to have a clean record.

25 A. I understand.

10

1 Q. Okay. If you don't understand any of the
 2 questions that I ask you or any of the phrases or terms
 3 that I use, please ask me to rephrase those, and I will.
 4 By the same token, if I don't understand one of
 5 your answers, I'm going to ask you to explain. Okay?
 6 A. Correct.
 7 Q. Again, as I told you before the deposition, if
 8 at any time you wish to take a break, at any time, let
 9 me know. We'll take a break to accommodate your
 10 schedule.
 11 I know you indicated you have family or
 12 relatives flying in, so if at any time you need to take
 13 a break, please let me know.
 14 A. (Witness nodded head.)
 15 Q. At the end of your deposition, a deposition
 16 transcript will be prepared by the court reporter.
 17 You'll have an opportunity to review that transcript,
 18 make any changes that you feel are necessary to that
 19 transcript.
 20 However, I must caution you, if you change any
 21 answers substantively, if you change a "yes" to a "no,"
 22 or a "no" to a "yes," I or any other counsel can later
 23 comment upon those changes, and it may affect your
 24 credibility later down the line.
 25 Do you understand?

11

1 A. Yes.
 2 Q. Mr. Keilholtz, are you under the influence of
 3 any medication, drugs or alcohol that would influence
 4 your ability to give your best testimony today?
 5 A. No, I'm not.
 6 Q. Okay. I noticed, you didn't bring any
 7 documents today, did you?
 8 A. No.
 9 Q. Okay. We'll get into that a little bit later.
 10 What I'd like to do then, I don't have a copy
 11 of your current resumé, so what I'd kind of like to do
 12 is just briefly break down some of the areas of your
 13 past experience, training, education.
 14 Where did you go to high school, Mr. Keilholtz?
 15 A. Lowell High School in San Francisco.
 16 Q. Walt?
 17 A. Lowell.
 18 Q. Lowell. L-o-w-e-l-l?
 19 A. Yes.
 20 Q. Okay. And what is the date of your birth,
 21 Mr. Keilholtz?
 22 A. January 1st, 1936.
 23 Q. And are you currently employed?
 24 A. I'm a consultant occasionally, but right now I
 25 don't have anything going on. I may have something

12

1 soon.
 2 Q. Do you have your own business?
 3 A. Yeah, it's a sole proprietorship as a
 4 consultant.
 5 Q. And that's the Rosenthal Group?
 6 A. Yes. I do business as the Rosenthal Group.
 7 Q. And what is your title with the Rosenthal
 8 Group?
 9 A. I don't have a formal title. There are only
 10 two people.
 11 Q. Okay. And that would be yourself and whom?
 12 A. Howard Rosenthal.
 13 Q. And what are your -- essentially your job
 14 duties or job responsibilities with respect to being a
 15 consultant for the Rosenthal Group?
 16 A. We do mergers and acquisitions. Everything is
 17 for the printing industry, specifically.
 18 So we do mergers and acquisitions; we give
 19 financial advice; we help develop strategies; we review
 20 print processes. The whole range or gamut of services
 21 that are required by the printing industry.
 22 Q. When you say "print processes," to what are you
 23 referring?
 24 A. The methods used in the production of
 25 materials, such as the books around this room.

13

1 Q. That would be -- so that would be books. Would
 2 that include ink?
 3 A. You can't print without ink --
 4 Q. Okay.
 5 A. -- or some form of some material --
 6 Q. Okay.
 7 A. -- that puts the image down on the sheet.
 8 Q. So your consulting services with the Rosenthal
 9 Group would consist of recommendations for what type of
 10 ink to use on substrate or --
 11 A. I would never get into that level of
 12 recommendation.
 13 Q. Okay.
 14 A. Those are usually based on favoritisms of
 15 people that supply materials.
 16 Q. Okay. Then that I'm trying to nail down from
 17 you, sir, is what specifically are your jobs with the
 18 respect to being a consultant for the Rosenthal Group
 19 with respect to printing processes.
 20 A. Well, people -- one of the issues today that
 21 would be -- people would be looking into whether they
 22 should go digitally or buy additional offset equipment,
 23 which is a type of manufacturing equipment for the
 24 printing industry.
 25 And so depending on the mix of work that a

14

1 company has, it might be better to go digital and buy a
 2 digital machine, or it might be better to buy an offset
 3 machine.
 4 That is the type of thing that I would be
 5 involved in.
 6 Q. Anything to do with management of chemicals or
 7 solvents for the printing industry?
 8 A. I've never been involved in that.
 9 Q. Okay. When were you first -- withdraw that.
 10 When did you begin as a consultant for the
 11 Rosenthal Group?
 12 A. I don't have the exact date. We -- after
 13 selling Cal Central, I did a number of consulting things
 14 and hooked up with Howard.
 15 And at some point in time, Howard and I started
 16 to work together as the Rosenthal Group, but I don't
 17 remember exactly when that took place.
 18 Q. Sometime after nineteen --
 19 A. After '96. Sometime after '98 probably, '99.
 20 Q. Mr. Keilholtz, again, let me finish my question
 21 before you --
 22 A. I'm sorry.
 23 Q. That's fine.
 24 And in what year did you sell Cal Central
 25 Press?

15

1 A. 1996.
 2 Q. And to whom did you sell it?
 3 A. American Lithographers.
 4 Q. And did you have any interest in American
 5 Lithographers at the time that Cal Central Press was
 6 sold to American Lithographers?
 7 A. No, I did not.
 8 Q. Okay. What year did you graduate high school?
 9 A. '54.
 10 Q. And then did you attend any colleges,
 11 Mr. Keilholtz?
 12 A. Yes, I did.
 13 Q. And what colleges would those be?
 14 A. I went to Stanford University.
 15 Q. And did you graduate from Stanford?
 16 A. Yes, I did.
 17 Q. In what year, sir?
 18 A. 1958.
 19 Q. And what was your degree in?
 20 A. History.
 21 Q. During the period of 1954 to 1958, did you have
 22 any employment?
 23 A. Yes.
 24 Q. And for whom -- or by whom were you employed?
 25 A. A cafeteria in Palo Alto that I can't remember

16

1 the name of, out of business; the public library in Palo
 2 Alto; and for Sacramento Lithograph here in Sacramento.
 3 Q. And what years were you employed by Sacramento
 4 Lithograph in Sacramento?
 5 A. It was summer work, and I don't know if I
 6 worked every summer or not.
 7 Q. So to your best recollection, it would be the
 8 summers between 1954 and 1955?
 9 That's a "yes"?
 10 A. No, between '54 and '57.
 11 Q. '57.
 12 And you graduated from Stanford, again, in what
 13 year?
 14 A. '58.
 15 Q. Okay. So you worked at Sacramento
 16 Lithographer -- or Lithograph, I beg your pardon.
 17 A. Sacramento Lithograph Company.
 18 Q. That would be the summers between '54 and
 19 '57 --
 20 A. Correct.
 21 Q. -- is that correct?
 22 A. Correct.
 23 Q. One thing I forgot to tell you at the
 24 beginning, Mr. Keilholtz, I know a lot of things
 25 happened a long time ago, and I don't expect you to have

17

1 specific dates for me.
 2 A. Right.
 3 Q. But I'm entitled to your best recollection and
 4 a best estimate.
 5 A. Right.
 6 Q. So if I try to narrow you down, again, don't
 7 think I'm being rude. I just need to narrow it down to
 8 get a clear record for myself.
 9 A. Okay.
 10 Q. Thank you.
 11 And what was your job title at Sacramento
 12 Lithograph?
 13 A. In the summers?
 14 Q. Yes, sir.
 15 A. I didn't have a job title.
 16 Q. What were your job responsibilities?
 17 A. Whatever people needed. I don't think I did
 18 the lithography. Probably some bindery work, odd-ball
 19 stuff. You know, what kids do in the summer.
 20 Q. Do you recall where Sacramento Lithograph was
 21 located?
 22 A. Certainly do. 220 S Street in Sacramento.
 23 Q. Are they still in operation?
 24 A. No.
 25 Q. And what kind of printing process -- strike

18

1 that.

2 What kind of printing processes were being

3 conducted at Sacramento Lithograph during the time that

4 you were employed during the summers between 1954 and

5 1957?

6 A. Lithography and letter press.

7 Q. And during your employment during the summers

8 for Sacramento Lithograph, did you ever have any

9 participation in any of the operations of the lithograph

10 machine?

11 A. No.

12 Q. How about the letter press machine?

13 A. No.

14 Q. During your summers working for Sacramento

15 Lithograph, were you ever educated or trained as to the

16 processes of the operation of the lithograph press?

17 A. Just by observation but no formal training.

18 Q. And same question with respect to the letter

19 press?

20 A. Same, observation, no training.

21 Q. Okay. In your summer employment with

22 Sacramento Lithograph, were you familiar with any of the

23 chemicals or solvents that were used in the lithograph

24 operations?

25 A. No.

19

1 Q. Were you aware that solvents and chemicals --

2 at the time that you were working during the summers for

3 Sacramento Lithograph, were you aware of the fact that

4 solvents and chemicals were used in the operations of

5 the lithograph press?

6 A. I didn't know what they were called, but I know

7 that we had substances that we put in the press. I

8 didn't know what a solvent was probably then.

9 Q. When you say "put in the press," what do you

10 mean?

11 A. In lithography, besides having ink that goes

12 into the machinery, you also have chemicals that go into

13 the machinery. And it's water, and at that time with

14 alcohol and some very small amount of -- I don't

15 remember what the heck the other thing was.

16 Q. Do you refer to those as fountain solutions?

17 A. Yeah.

18 Q. Okay.

19 A. Yes.

20 Q. Thank you.

21 How about with respect to cleaning any of the

22 lithograph machines at Sacramento Lithograph, were you

23 ever involved in that respect?

24 A. Not during the summers.

25 Q. Okay. And I presume at some point in time you

20

1 were later employed by Sacramento Lithograph?

2 A. Correct.

3 Q. Okay. And what year did you first become

4 employed by Sacramento Lithograph, other than the summer

5 work that we were previously speaking of?

6 A. 1961.

7 Q. Let me go back to your summer work at

8 Sacramento Lithograph.

9 Were you familiar with any of the cleaning of

10 any of the letter press machines during your summer work

11 at Sacramento Lithograph?

12 A. No.

13 Q. You were never involved in that at all?

14 A. No.

15 Q. Okay. So after you graduated from Stanford

16 University, did you attend any other college?

17 A. No.

18 Q. Did you attend any other -- strike that.

19 Did you attend any trade school after --

20 A. No.

21 Q. Let me finish my question, Mr. Keilholtz.

22 Did you attend any trade school after you

23 graduated from Stanford University?

24 A. No.

25 Q. So between 1957 and 1961, 1961 being the time

21

1 that you went to work for Sacramento Lithograph, did you

2 have any other employment?

3 A. I was in the military.

4 Q. And what branch of the military?

5 A. Army.

6 Q. And that would be for the four years from the

7 '57 to sixty --

8 A. '58 when I graduated, to '61.

9 Q. Thank you.

10 And just generally, what were your duties in

11 the Army during that time period?

12 A. I worked in the mental hygiene clinic. I was a

13 clinical psychology technician.

14 Q. Okay. And then you went to work for Sacramento

15 Lithograph in 1961; is that correct?

16 A. Correct.

17 Q. Okay. And what was your job title in 1961 when

18 you were hired by Sacramento Lithograph?

19 A. Really didn't have a job title.

20 Q. Were you hired as a full-time employee?

21 A. Yes.

22 Q. What were your responsibilities as a full-time

23 employee for Sacramento Lithograph when you were hired

24 by them in 1961?

25 A. I started off doing bindery work and doing hand

22

1 collation.
 2 Q. What is hand collation?
 3 A. When you didn't have inserting machines, you
 4 would take pieces of paper and put them together, marry
 5 one piece to the other.
 6 So if you had a twenty -- a document with 20
 7 signatures, you would put them together by hand.
 8 Q. And when you were first employed as a full-time
 9 employee by Sacramento Lithograph, did you have any
 10 responsibilities with printing with respect to the
 11 lithograph machine?
 12 A. Not initially, no.
 13 Q. When did that change?
 14 A. Probably after six months.
 15 Q. When you first started working for Sacramento
 16 Lithograph in 1961, did you have any responsibilities
 17 with respect to the operation with the letter press
 18 machine?
 19 A. No.
 20 Q. Okay. In 1961 when you first started working
 21 for Sacramento Lithograph, how many letter press
 22 machines were at that location?
 23 A. I have no idea now. It was -- that company did
 24 not do a lot of letter press. It was a lithography
 25 company, basically.

23

1 Q. And how many lithograph presses were at that
 2 location?
 3 A. Well, probably four or five.
 4 Q. And what were the main types of jobs that were
 5 conducted, for whom they were conducted by Sacramento
 6 Lithograph?
 7 And by that I mean, were you all printing
 8 newsprint, magazines?
 9 A. It was coated work -- well, it wasn't all
 10 coated. It was coated work, and so we did some
 11 magazines.
 12 We also did a lot of work for Aerojet, which
 13 was not coated at all; that was more simple stuff. That
 14 was all secured work. Probably 20, 30 percent was
 15 Aerojet.
 16 And the rest, a variety of coated stock
 17 material, advertising pieces, as well as magazines.
 18 Q. And the ads were printed on coated stock?
 19 A. The advertising pieces were usually coated
 20 stock or high grade stocks, not newsprint.
 21 Q. Okay. So six months after your employment with
 22 Sacramento Lithograph, tell me how your job duties
 23 changed with respect to operations of the lithograph
 24 presses.
 25 A. I started to run a small what was called a

24

1 Multilith, which is a variety of a small printing press,
 2 a small litho press.
 3 Q. You're going to have to spell that for me, sir.
 4 A. Multilith, M-u--l-t-i-l-i-t-h.
 5 Q. And specifically what were your
 6 responsibilities with respect to that?
 7 A. Well, when you run one, you turn out work, so I
 8 was putting jobs through the press.
 9 Q. Okay. So you worked in the press room?
 10 A. Correct.
 11 Q. Did you work in the prepress room during --
 12 A. Not during that period of time, later.
 13 Q. Later. Okay. We'll get to that.
 14 So six months after you became employed at
 15 Sacramento Lithograph, your duties changed in that you
 16 were now working in the press room with the lithograph
 17 press?
 18 A. Correct.
 19 Q. Okay. And for how long did you do that?
 20 A. Three months, six months.
 21 Q. Now, in your operations -- strike that.
 22 In your employment with Sacramento Lithograph
 23 with respect to operating the lithograph machine, were
 24 you also responsible for any cleaning of that machine?
 25 A. Yes. When you run a Multilith, you have to

25

1 clean it up afterwards.
 2 Q. And can you describe to me the processes
 3 involved with respect to cleaning up a Multilith?
 4 A. You put some -- you -- I'm not sure of the
 5 exact way in which we did it then because things have
 6 changed so much, but we would squirt some fluid onto the
 7 rollers where the ink was, and we would take a rag and
 8 clean that.
 9 Q. Was this a one-step process?
 10 A. Well, I don't know if you'd call it one step.
 11 There wasn't -- I mean, there were several other things
 12 you -- no, that was -- I guess you'd call it one step.
 13 I don't know how you'd categorize it.
 14 Q. Okay. Sure. And that's fair.
 15 I'll explain. What I'm trying to get at, is
 16 when you cleaned the rollers, when you put the fluid on
 17 the rollers, was that it, you did it with one fluid
 18 once, or did you back it up with a second fluid? Did
 19 you do it a second time, or did you do it as required?
 20 A. Well, it would be as required because you have
 21 to get rid of all the ink, and different inks had
 22 different tacks, or some would adhere more to the
 23 rollers than others.
 24 And so you just keep cleaning until you -- can
 25 I take a break? This is probably my brother-in-law.

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1 MR. GRAHAM: We're off the record.
 2 (Off the record.)
 3 MR. GRAHAM: All right. Back on.
 4 Q. Okay. Before a short break, Mr. Keilholtz, we
 5 were talking about cleaning the rollers for the
 6 Multilith.
 7 Is that a Multilith machine?
 8 A. Uh-huh.
 9 Q. Okay.
 10 A. That was a brand.
 11 Q. A brand.
 12 A. I guess you'd call them duplicating press. A
 13 Multilith was actually a brand name of a particular
 14 duplicator.
 15 Q. Now, going back to cleaning the rollers on this
 16 Multilith -- is it Multilith press? I just want to use
 17 the appropriate --
 18 A. (Witness nodded head.)
 19 Q. Okay.
 20 -- on the Multilith press, you would put the
 21 fluid on the rollers and then clean it off with a rag?
 22 A. (Witness nodded head.)
 23 Q. "Yes"?
 24 A. Correct.
 25 Q. Okay.

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1 A. I'm sorry.
 2 Q. No, that's fine.
 3 And then what was typically done with those
 4 rags?
 5 A. They were put into a metal container.
 6 Q. Okay. And cleaning the rollers, we were
 7 talking about, I mean, that would be roller wash that
 8 you would be using, correct?
 9 A. Correct.
 10 Q. Okay. Do you know what types of roller wash
 11 that you were using at Sacramento Lithograph?
 12 A. No. Brands I wouldn't know, and I don't even
 13 remember what the materials were particularly. I mean,
 14 I didn't pay attention.
 15 Q. Okay. Did you also use rubber coaters on those
 16 rollers?
 17 A. Never heard of a rubber coater.
 18 Q. Okay. Have you ever heard of a blanket wash?
 19 A. Yes.
 20 Q. What is a blanket wash?
 21 A. That's a material also that when you're running
 22 your press, the blanket will get dirty. And sometimes
 23 little bits and specks will adhere to the blanket, and
 24 you have to clean it up again with the rag.
 25 And on the rag you have some kind of a solvent

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1 or cleaning material to clean up the blanket.
 2 Q. And when you worked at Sacramento Lithograph,
 3 were you familiar with what type of solvent was used for
 4 the blanket washes?
 5 A. No.
 6 Q. Okay. Have you since become familiar with what
 7 types of chemicals are used in blanket washes?
 8 A. Well, certainly now, but I -- you know, that's
 9 not part of what I've been working on, so I couldn't
 10 give you any information that I know about solvents.
 11 Q. Sure.
 12 A. Or what they're composed of or what the brands
 13 are.
 14 Q. But you said you've since become familiar with
 15 what types of chemicals are used in blanket washes.
 16 A. Well, I've become aware that the solvents --
 17 that solvents are used, and there has been some question
 18 about the -- and problems with solvents and what you do
 19 with them.
 20 Q. Do you know specifically what types of
 21 solvents?
 22 A. No.
 23 Q. Have you ever heard the term "PCE"?
 24 A. PCE?
 25 Q. Yes, sir.

29

1 A. Or PCB?
 2 Q. PCE, as in Edward.
 3 A. Yeah, I think I have.
 4 Q. Have you ever heard of the solvent TCE?
 5 A. No.
 6 Q. Have you ever heard of the solvent 111 TCA?
 7 A. I think I remember something called 111, but I
 8 don't remember TCA.
 9 Q. So going back to your time when you were
 10 working for Sacramento Lithograph, with respect to the
 11 operations of the Multilith press and the operations in
 12 the press room, was there any wastewater that was
 13 generated through those operations?
 14 A. I'm hesitating because I'm trying to
 15 remember -- they always have a water solution in the
 16 tray to mix with the ink. That's part of the offset
 17 process.
 18 And I'm trying to remember if we ever cleaned
 19 that -- I mean, we'd clean it, but I think it just kept
 20 adding water to it. So I don't think we ever really got
 21 rid of it.
 22 Q. And during the operation of the Multilith press
 23 that you're talking about at Sacramento Lithograph --
 24 strike that.
 25 During your operation of the Multilith press

30

1 during the time that you were employed by Sacramento
 2 Lithograph, did you ever clean the press itself?
 3 A. You mean the frame of the press?
 4 Q. Yes. To get ink off?
 5 A. No, I never did.
 6 Q. Okay. Did you ever clean the area around the
 7 Multilith press to remove ink or dirt?
 8 A. Well, you wouldn't have ink around it unless
 9 you were terribly sloppy. You might have dirt that
 10 comes from someplace else, but that would be cleaned by
 11 the janitors at night.
 12 Q. Okay. Would you describe the Multilith process
 13 as a sloppy process?
 14 A. No.
 15 Q. Okay.
 16 A. If you're sloppy, you're going to be a terrible
 17 pressman.
 18 Q. What about with respect to printing on a coated
 19 substrate, would you classify that process as a messy
 20 process?
 21 A. No, the same. A little more absorption of ink
 22 perhaps into an uncoated stock, but the coated -- the
 23 ink sits, but it still dries very similar.
 24 And, again, that can't be messy. You'd have
 25 streaking and everything else on your final product.

31

1 Q. Is the ink with the coated substrate process --
 2 or coated substrate, the ink that's used in that
 3 process, is that a less viscous ink?
 4 A. Than what?
 5 Q. Than the ink that is used, say, with a
 6 Multilith machine?
 7 A. No, the viscosity is pretty much similar in all
 8 offset processes.
 9 Q. In your operations at Sacramento Lithograph,
 10 specifically with the Multilith press, did you all make
 11 use of any sort of drying units?
 12 A. No.
 13 Q. Okay. That was not necessary for that process?
 14 A. No.
 15 Q. Okay. So we've been talking about the time
 16 that you worked for Sacramento Lithograph with respect
 17 to your operations of the Multilith press.
 18 And you indicated to me earlier that at some
 19 point in time that your duties changed, and I think you
 20 said that that was approximately three months; is that
 21 correct?
 22 A. Correct.
 23 Q. And then how did your job duties change after
 24 that three-month period of time?
 25 A. Then I became a feeder on a two-color press.

32

1 Q. What does a feeder on a two-color press do?
 2 A. The two-color press was a larger machine than
 3 the Multilith, so it turned out a larger sheet of paper.
 4 I believe the machine was turning out 23-by-35-inch
 5 stock or pieces of paper, one at a time.
 6 And the feeder helps keep -- it puts the paper
 7 in the back end of the press while the pressman takes it
 8 off the front and checks during the run to make sure
 9 that the color is consistent and it looks good.
 10 And the feeder kept making sure that the back
 11 end of the press is working properly because you're
 12 feeding at that time, probably you're doing four to
 13 5,000 sheets an hour.
 14 Q. Those were sheet-fed presses?
 15 A. Yes.
 16 Q. Okay. This Multilith press, was that a --
 17 A. Sheet-fed.
 18 Q. -- that was sheet-fed, also?
 19 A. (Witness nodded head.)
 20 Q. And for how long a period of time were you a
 21 feeder on this two-color press?
 22 A. Probably three months, six months.
 23 Q. Okay. And with respect to this two-color
 24 press, did you have any responsibilities with respect to
 25 cleaning the press in any way?

33

1 A. The same as with the Multilith, both the
 2 pressman and the feeder would go ahead and work together
 3 to clean up the rollers or -- again, the blanket cleanup
 4 would be by the pressman, but the roller cleanup at the
 5 end of the run would be by both feeder and pressman.
 6 Q. And then after that three- to six-month period,
 7 did your job duties change in any way at Sacramento
 8 Lithograph?
 9 A. Yes.
 10 Q. Okay. And how did they change?
 11 A. I went to prepress.
 12 Q. Okay. Did you have a specific job title?
 13 A. Well, at that point they call the people in
 14 prepress strippers.
 15 Q. Strippers?
 16 A. So I was a stripper.
 17 Q. All right. And for fear of a chuckle, tell me,
 18 sir, what does a stripper do?
 19 A. It changed completely with electronics, but in
 20 the old days we would take film from the camera, put it
 21 into a flat that was an orange material, and we would
 22 adhere the film to the flat.
 23 We'd cut out the excess material. Just all we
 24 wanted was the film to show through, and we would take
 25 that film or that layout and would put it on top of a

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1 metal plate and would burn the plate.
 2 And that plate is what goes on the press in
 3 order to get the image transferred.
 4 Q. Let me back up just for a second to your
 5 operations with the Multilith press.
 6 In your operations of that press, did you have
 7 any responsibilities with respect to cleaning the
 8 plates?
 9 A. When you take the plates off, all you do is rub
 10 them down again with the material, and you put gum on
 11 top of it to save the plate for the future. They don't
 12 save plates anymore, but they used to.
 13 Then if there's a rerun, you take the old plate
 14 out and put it back on. Same would apply in the bigger
 15 presses.
 16 Q. And when you say "the bigger presses," you're
 17 speaking of --
 18 A. 23-by-35 size, like the one that -- the
 19 two-color that I worked on.
 20 Q. That's what I was trying to clarify.
 21 You said with the operations of the Multilith,
 22 you take them off and rub them down with material. What
 23 material? What are you --
 24 A. Well, I don't remember if it's the same
 25 material you used on the rollers. But it was a chemical

35

1 or something that was clearer, and you'd just wipe the
 2 press -- the plate down to get rid of the excess ink.
 3 And then you'd squirt this gum arabic on top of
 4 the plate and let it dry for a few seconds before
 5 storing.
 6 This is like history. This is old stuff.
 7 Q. I'm enjoying it.
 8 Your operations in the prepress at Sacramento
 9 Lithograph, other than your job title as a stripper and
 10 the job duties that you just described earlier, did you
 11 have any other additional duties?
 12 A. Well, my basic job during the period probably
 13 of about nine months was -- I mentioned the Aerojet work
 14 that we did, and it was a huge amount of work.
 15 And on a second shift, I would come in, and I
 16 would load the camera. And from the back end I'd put
 17 the film in the camera, and we had somebody up front
 18 putting the copies or the stuff we wanted to shoot in
 19 the holder outside.
 20 And then would push the button, and we would
 21 turn out -- we were turning out something like 60 films
 22 an hour, which was pretty good speed at that time,
 23 20/24.
 24 This is all simple black work, so that was
 25 really the basic thing I was doing. And at that time we

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1 hand-developed the film so we didn't have developing
 2 machines.
 3 And so we'd put the film in a tray, and I would
 4 do that. And you'd rock the tray back and forth, take
 5 the film out, and then you'd hang it up to dry.
 6 Q. You said "pretty good speed at that time,
 7 20/24," what do you --
 8 A. 60 copies -- 60 pieces of 20 by 24 film. So
 9 we're doing one 20-by-24 piece of film, which would
 10 hold eight -- which would hold four pages of
 11 eight-and-a-half-by-11 material, and we're doing one
 12 every minute.
 13 Q. You became employed by Sacramento Lithograph in
 14 1961; is that correct?
 15 A. Correct.
 16 Q. Okay. And when did you end your employment
 17 with Sacramento Lithograph?
 18 A. Sacramento Lithograph became Cal Central Press
 19 in early 1962, due to a merger of two companies. So
 20 what I've been describing took place under Sacramento
 21 Lithograph as well as under Cal Central Press.
 22 MR. GRAHAM: Can we go off the record for just
 23 one second?
 24 (Off the record.)
 25 MR. GRAHAM: All right. Back on.

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1 Q. So then after your job as a stripper in the
 2 prepress room for Sacramento Lithograph, did your job
 3 title change in any way after that?
 4 A. I have to kind of smile. We didn't really call
 5 things job titles, so no one ever thought much about
 6 that.
 7 But at some point in time after prepress, I
 8 became an estimator. No one really called me estimator.
 9 I always did whatever I had to do, and it would include
 10 other things, like talking to customers, and going back
 11 in the camera room, and going out to the bindery,
 12 delivering product.
 13 Q. Okay. So then is it fair to say that when
 14 you -- well, when your job duties changed, when you
 15 became an estimator, the job duties you've just
 16 described, is it fair to say that you no longer had any
 17 duties or responsibilities with respect to the press
 18 operations?
 19 A. Well, if they needed me out there, I'd go out
 20 there. I always had responsibility for everything that
 21 I'd done before.
 22 Q. Okay.
 23 A. So I'd get in and help.
 24 Q. Okay. So it wasn't the fact that you became an
 25 estimator and all of a sudden you were moved to an

10 (Pages 34 to 37)

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1 office and you no longer hung out with the prepress
 2 guys?
 3 A. No, I hung out with everybody, but most of the
 4 time I would be up front when I was estimating.
 5 Q. And then you indicated that in 1962 that
 6 Sacramento Litho became Cal Central Press; is that
 7 correct?
 8 A. Correct.
 9 Q. And after I guess some sort of acquisition of
 10 Sacramento Litho by Cal Central Press, did Cal Central
 11 Press still operate at the 220 S Street location?
 12 A. For a short while.
 13 Q. For how long?
 14 A. Probably a year and a half.
 15 Q. And so then you became employed for Cal Central
 16 Press; is that correct?
 17 A. Correct.
 18 Q. Okay.
 19 A. Kept separate names, so I may have been getting
 20 checks from Sacramento Lithograph. Sacramento
 21 Lithograph continued as a company.
 22 Q. I got you.
 23 A. News Publishing and Sacramento Lithograph
 24 merged, created Cal Central as a selling agency.
 25 Sacramento Lithograph and News Publishing

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1 Company merged, took on the name of Cal Central, which
 2 was a selling agency, and the two manufacturing
 3 companies, News Publishing and Sacramento Lithograph,
 4 continued, with people being employed by one, the other,
 5 or by Cal Central.
 6 And I believe I was still employed by
 7 Sacramento Lithograph. Probably received my checks from
 8 Sacramento Lithograph through the mid '60s.
 9 Q. Did you -- strike that.
 10 What year did -- withdraw.
 11 Did job responsibilities as an estimator
 12 for Sacramento Lithograph change in any respect after
 13 the acquisition by Cal Central Press?
 14 A. Well, no. I became an estimator after Cal
 15 Central existed.
 16 Q. And then at what point in time did those job
 17 duties change?
 18 A. You mean when I became an estimator?
 19 Q. Yes.
 20 A. Well, I'm guessing approximately two and a half
 21 years after I was employed.
 22 Q. After you were first employed by Sacramento?
 23 A. First employed by Sacramento Lithograph.
 24 Q. And then how did your job duties change as an
 25 estimator in that period of time?

40

1 A. Well, I was estimating, so when people wanted a
 2 job, we'd figure out what it was going to cost them.
 3 Q. Okay.
 4 A. That's that an estimator does.
 5 Q. I'm not familiar. That's why I'm asking you.
 6 And you remained an estimator for Sacramento
 7 Lithograph until what year?
 8 A. I don't know.
 9 Q. Can you give me a --
 10 A. I probably did it for about a year. And I'm
 11 not going to give years now because I'm going over
 12 periods, and I don't want to trap myself in getting my
 13 years and my periods mixed up.
 14 Q. Okay. Well, sir, I'm not going to trap you,
 15 and I'm entitled to your best estimate.
 16 A. And my best estimate is I worked as an
 17 estimator for about a year.
 18 Q. Okay. And then how did that change?
 19 A. Well, I'm not sure what was next because at
 20 that point I became more involved in the management.
 21 Sometime around '68 I started to run the plant
 22 as a production manager. And I remember that because
 23 that was 1968, that was the year I got married, so I
 24 always tie my being a plant manager with my marriage.
 25 Q. And you were -- you ran the plant as a

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1 production manager for what company?
 2 A. For the whole company, Cal Central, News
 3 Publishing and Sac Litho.
 4 Q. Were you an owner of Cal Central Press?
 5 A. Not at that time.
 6 Q. Okay. And when did you become an owner of Cal
 7 Central Press?
 8 A. In I believe '70, myself and -- I bought out my
 9 father, and my father's partner, two sons bought him
 10 out, and we then -- the three of us owned Cal Central
 11 Press.
 12 Q. And what are the names of those individuals?
 13 A. John Clark, David Clark.
 14 Q. So John Clark and David Clark were your
 15 father's partners?
 16 A. No, John Clark, Sr., was my father's partner.
 17 David Clark and John Clark, Jr., were the sons of John
 18 Clark, Sr.
 19 Q. Gotcha.
 20 And what was your father's name?
 21 A. Roy Keilholtz. Actually, it was William Roy,
 22 but he always went by Roy.
 23 Q. So you bought those gentlemen out in
 24 approximately 1970; is that correct?
 25 A. Correct.

42

1 Q. Okay.

2 MR. GRAHAM: Let's go ahead and mark this as 1

3 to Mr. Keilholtz.

4 (Whereupon Exhibit No. 1 was then marked for

5 identification.)

6 BY MR. GRAHAM:

7 Q. Mr. Keilholtz, you've been handed what's been

8 marked as Exhibit 1 to your deposition here today.

9 Do you recognize this document?

10 A. Yes.

11 Q. And you recall receiving this document?

12 A. Yes.

13 Q. And in fact, this is what commanded your

14 appearance today at your deposition, correct?

15 A. Yes.

16 Q. Okay. And when you received this document, did

17 you review the document in its entirety?

18 A. Yes.

19 Q. Okay. I'd like to turn you to, at the bottom

20 of the right-hand corner of this document, it's marked

21 as page 3.

22 A. Yes.

23 Q. And it starts in the bold there,

24 "Please take further notice that the

25 following documents must be produced."

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1 Do you see that?

2 A. Yes.

3 Q. Okay. When you received your deposition

4 subpoena, did you go through these categories of

5 documents? Did you read through them?

6 A. I read it.

7 Q. Okay. And what effort did you make on your

8 part to obtain documents that would be responsive to the

9 categories of documents that were subpoenaed here?

10 A. I made no effort because there are no records.

11 Q. How are you so sure that you have no records?

12 A. Because during various -- when Cal Central was

13 sold to Sacramento Litho -- excuse me -- when Cal

14 Central was bought by American Litho, we had a lot of

15 records, an assortment of things from various companies

16 that we had owned, in the back of the company.

17 And at one point, the people that took over the

18 company got rid of all those records, which concerned me

19 at the time because of tax issues, because there were

20 records that might have been needed had we had a tax

21 audit.

22 That never happened, fortunately, so it was

23 never a problem. But they took the stuff and shredded

24 it, including employee records, from the employees'

25 records from before they bought the company.

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1 Q. When you say "they" took them and shredded

2 them --

3 A. American Litho. I'm sorry, I butted in.

4 Finish.

5 Q. When you say "they" took them and shredded

6 them, who is "they"?

7 A. The managers of American Litho.

8 And six months later that was purchased by

9 Jefferson Smurfit, S-m-u-r-f-i-t. And a year and a half

10 or two years later that was purchased by Consolidated

11 Graphics.

12 And during that process, things -- anything

13 that had been saved or would have been there, slowly, I

14 know would disappear. And I have no access to that

15 stuff anyway, even if it was still there.

16 Q. Could you give me the names of any of the

17 managers of American Lithograph that you believe were

18 involved with respect to these documents that we've been

19 speaking of?

20 A. No, I don't have any names.

21 Q. You don't --

22 A. In fact, I was irritated. I think they had a

23 human resource person they had brought into the company

24 who on her own decided to do that and called on the

25 people to have the stuff shredded.

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1 And I thought that was an idiotic decision, but

2 I had nothing to say. I didn't own the company anymore.

3 Q. So you have no documents at all within your

4 possession regarding the purchase -- your purchase of

5 Solano Printers & Lithographers?

6 A. No.

7 Q. And you have no documents with respect to any

8 insurance policies that you would have taken out on any

9 of the businesses that you'd owned?

10 A. No. No. If I had every document we'd had 30

11 or 40 years ago, my God, I wouldn't have room in my

12 house to live.

13 Q. Have you ever maintained any off-site storage

14 areas for business documents?

15 A. No.

16 Q. And you don't have any documents in your

17 possession regarding any design or layout of any

18 buildings at 622 Jackson Street?

19 A. No.

20 Q. And you have no documents with respect to any

21 leases that occurred between you and any other person

22 with respect to 622 Jackson Street?

23 A. No.

24 Q. No photographs, no pictures of old presses,

25 nothing?

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1 A. No.

2 Q. Mr. Keilholtz, prior to your deposition today,

3 did you speak with anyone with respect to your

4 deposition today?

5 A. You.

6 Q. Right.

7 A. And the attorney (indicating).

8 Q. And when you say "the attorney," you're

9 pointing to Mr. -- I'm --

10 A. I don't know your last --

11 MR. NICKOVICH: Nickovich.

12 THE WITNESS: Nickovich.

13 BY MR. GRAHAM:

14 Q. And when did you speak to Mr. Nickovich?

15 A. Approximately a week ago. Maybe a week and a

16 half.

17 Q. Did he call you or you call him?

18 A. He called me.

19 Q. And on his side of the line was there anyone

20 else on that conversation that you're aware of?

21 A. Not that I'm aware of.

22 Q. And on your side of the line was there anyone

23 else on that conversation?

24 A. Absolutely not.

25 Q. Okay. And for how long did you all talk?

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1 A. Probably 20 minutes.

2 Q. Okay. And what all did you discuss?

3 A. He explained the nature of the litigation that

4 was taking place and why I was involved.

5 Q. Explained the nature of the litigation and

6 what?

7 A. And why I was involved.

8 Q. What did he tell you with respect to his

9 explanation of the nature of the litigation?

10 A. Essentially what you told me, was that there

11 was a question about contamination in the City of

12 Fairfield.

13 And he, like you, said they were looking for

14 the possible sources of that contamination other than

15 just your client. You both confirmed the same thing.

16 He probably gave me I suppose a bit more

17 detail, but it all blends together.

18 Q. And why do you believe he gave you more detail?

19 A. Because we talked longer.

20 Q. And what type of additional detail did

21 Mr. Nickovich provide to you?

22 A. Again, they blended -- the conversations

23 between you and him blended together.

24 Q. Did he tell you what type of contamination was

25 in the City of Fairfield that was the subject of this

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1 litigation?

2 A. Yeah. He said PCBs, I thought. You said PCE

3 earlier, but I thought PCBs.

4 Q. Did he tell you anything else with respect to

5 the types of contamination that were the subject of this

6 litigation?

7 A. Well, I was aware that dry cleaners have

8 problems with PCBs and had guessed that this probably

9 was a dry cleaning problem, and so we talked about that.

10 Q. And what did you talk about with respect to the

11 dry cleaners' problems of PCBs?

12 A. Is that the right term? I don't know.

13 We talked about, yes, this is a common problem

14 with dry cleaners' business, and so far as I knew that

15 there was no problem that had ever come up in my

16 knowledge in the printing industry that involved PCBs.

17 Q. And -- but he didn't mention any other

18 contaminant that was the subject of this litigation

19 other than what you understood to be PCB?

20 A. No, he did not.

21 Q. Did he ask you about your operations at

22 622 Jackson?

23 A. I don't -- I know you did, but I don't know if

24 he did or not. I think he was aware of what was there,

25 so I'm not sure.

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1 Q. Okay. Anything else that he explained to you

2 with respect to the nature of the litigation that you

3 haven't already told me?

4 A. No.

5 Q. And then you indicated that he also told you or

6 you also discussed why you were involved; is that

7 correct?

8 A. Right.

9 Q. Okay. And what was discussed with respect

10 to -- as to why you were involved?

11 A. Well, in a case like this, and this is going on

12 all over California, that everybody looks for deep

13 pockets to find someone who can afford to pay for this

14 cleanup.

15 Q. Is that what Mr. Nickovich told you? Or is

16 this something you discussed or --

17 A. Yes, that's what he told me.

18 Q. That's what he told you.

19 And did he tell you why anybody would be

20 looking at you for a deep pocket?

21 A. Because I owned the company that once occupied

22 the quarters.

23 I mean, that's -- I don't know if he told me

24 that, but it stands to reason that if this is true, and

25 I do know that it's a problem with dry cleaners and

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1 they're going after dry cleaners all over the state.
 2 And I know that for a fact without ever having
 3 been involved in this particular deposition.
 4 Q. Are you also aware that they're going after
 5 printers up and down the state for contamination that
 6 resulted from historical printing operations?
 7 A. No, I am not.
 8 Q. And in your work as a consultant for the
 9 Rosenthal Group, you're not aware of any issues with
 10 respect to allegations by any regulatory agencies, say,
 11 the EPA, any other regulatory agency with respect to
 12 alleged contamination from the operations of printers?
 13 A. I'm on the board of directors of the Printing
 14 Industries of California, which is a group that does
 15 lobbying for the State and al- -- for the industry to
 16 the State, and also tracks things, like some of the
 17 problems that we've had with the afterburners and webs,
 18 and so on.
 19 And nothing has come up at all about
 20 contamination in the industry. And we have regular
 21 meetings, and I was just at a meeting a month ago.
 22 So I know of no problems that are arising at
 23 this time within our industry, specifically, about any
 24 contaminants other than traditional concerns.
 25 We used to worry about silver because that was

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1 going down the drain, and then we had silver collections
 2 to get that out of there. That was from film, when we
 3 still used film.
 4 And everybody started to use more cleanup
 5 things, but that was more of a thing for the ozone
 6 issues that we have, so we started to use different
 7 chemicals in cleanup.
 8 But, again, with a -- under the regulations
 9 that we're trying to clean up the environment, the air
 10 quality.
 11 Q. And in that capacity that you just described,
 12 have you ever read, reviewed any information with
 13 respect to a regulatory agency, documents, information
 14 regarding toluene contamination at old historical
 15 printing sites?
 16 A. No.
 17 Q. Been going about an hour, Mr. Keilholtz. You
 18 want to take a break and --
 19 A. I'd rather get out of here as soon as possible.
 20 Q. Okay. Well, I'm going to do the best I can.
 21 We'll keep going.
 22 MR. GRAHAM: We'll leave it to the court
 23 reporter then. Would you like to take a break?
 24 THE REPORTER: If we can take a break at some
 25 point.

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1 MS. McADAM: Maybe within half an hour, take a
 2 quick break.
 3 BY MR. GRAHAM:
 4 Q. Okay. So other than the deep-pocket
 5 conversation that you had with Mr. Nickovich --
 6 MR. NICKOVICH: Objection, mischaracterizes his
 7 testimony. Move to strike that comment.
 8 MR. GRAHAM: Well, it's not a comment yet. I'm
 9 working on my question, sir.
 10 Q. With respect to the conversation that you just
 11 described with -- regarding this deep-pocket
 12 conversation you had with Mr. Nickovich --
 13 MR. NICKOVICH: Objection, mischaracterizes his
 14 testimony.
 15 MR. GRAHAM: Sir, let me finish my question --
 16 MR. NICKOVICH: Move to strike that comment.
 17 MR. GRAHAM: -- first before you object,
 18 please.
 19 Q. With respect to the conversation that you just
 20 described with Mr. Nickovich regarding the deep-pocket
 21 issues, did Mr. Nickovich tell you any other reasons why
 22 you were involved in this litigation?
 23 MR. NICKOVICH: Objection, move to strike,
 24 mischaracterizes the testimony.
 25 BY MR. GRAHAM:

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1 Q. You can answer now.
 2 A. I can?
 3 Q. Yeah.
 4 A. Well, I'm not sure what the question is now
 5 since you had the conflict.
 6 Q. One thing I probably forgot to tell you in the
 7 beginning is after I ask a question, any other counsel
 8 at this table can make objections.
 9 A. Right.
 10 Q. Okay. They're doing it merely to preserve
 11 their objections for the record so that at a later time
 12 they can take it to the Court and complain about the
 13 style of my question. Okay?
 14 Please don't let any of the attorneys'
 15 objections distract you, and focus on my question.
 16 Okay. No one will be instructing you not to answer, so
 17 you need to answer my questions.
 18 A. So what is the question?
 19 Q. I'm about to give it to you. Just one second.
 20 With respect to the conversation that you just
 21 described regarding the deep-pocket conversation that
 22 you had with Mr. Nickovich, did Mr. Nickovich provide to
 23 you any other information with respect to why you were
 24 involved in this case?
 25 MR. NICKOVICH: Objection, mischaracterizes the

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1 testimony, move to strike.
 2 THE WITNESS: No.
 3 BY MR. GRAHAM:
 4 Q. Other than the conversation that you had with
 5 myself and the conversation that you had with
 6 Mr. Nickovich, did you speak to any other attorneys
 7 prior to your deposition here today?
 8 A. Yes.
 9 Q. Who?
 10 A. A woman named Judith Anshin.
 11 Q. Okay. Other than that person, did you speak to
 12 any other attorneys --
 13 A. No.
 14 Q. -- with respect to your deposition here today?
 15 A. No.
 16 Q. Did you review any documents in preparation for
 17 your deposition today?
 18 A. I have no documents except this (indicating).
 19 Q. Well, I mean, there are other possibilities. I
 20 just wanted to know if prior to your deposition today if
 21 you reviewed any documents to prepare yourself for your
 22 deposition.
 23 A. I looked up "PCB" on Google, if you consider
 24 that a document -- I guess that's a document.
 25 Q. And what did you learn with respect to your

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1 research of PCB on the Internet prior to your deposition
 2 today?
 3 A. I was rather disappointed in the sparsity of
 4 information available on Google.
 5 Q. Did you do any other follow-up research with
 6 respect to PCBs -- just to be clear, you're saying P-C-B
 7 as in boy, correct?
 8 A. Correct.
 9 Q. Okay. Did you do any other research -- other
 10 than your Google search for PCB, did you do any other
 11 research whatsoever prior to your deposition today?
 12 A. Well, simultaneously, I did look up printing
 13 and contamination. Again, found very scant information.
 14 It really wasn't helpful.
 15 Q. Did you save any of those documents?
 16 A. No, but I just could call them up again. I
 17 could call them up again. Why would I save them?
 18 They're on the computer.
 19 Q. I'm just asking if you saved them.
 20 A. No.
 21 Q. Okay.
 22 A. I know how to find them again.
 23 Q. You didn't open up a file and --
 24 A. No.
 25 Q. Let me just finish my question, Mr. Keilholtz.

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1 You didn't open up a file and then transfer
 2 those documents into the file?
 3 A. I did not.
 4 Q. Okay. Did you print any copies of those
 5 documents?
 6 A. I did not.
 7 Q. Do you recall any of the authors of the
 8 documents that you reviewed prior to your deposition
 9 today with respect to printing and contamination?
 10 A. No.
 11 Q. Do you recall generally any opinions or any
 12 facts that you read with respect to your research on
 13 printing and contamination in preparation for your
 14 deposition today?
 15 A. No, I felt there wasn't anything particularly
 16 relevant.
 17 Q. And why did you not feel that there was
 18 anything particularly relevant?
 19 A. I couldn't find any particular allusion or
 20 reference to the industry in terms of the kind of -- the
 21 kind of contamination that I understood was being
 22 investigated.
 23 Q. Okay. Have you read the Complaint in this
 24 case, sir?
 25 A. No.

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1 Q. Has anybody ever provided to you a copy of the
 2 Complaint in this case?
 3 A. No.
 4 Q. All right. I want to move along to the
 5 property that is -- one of the properties that is the
 6 subject of this litigation, and that's property that we
 7 commonly have been referring to as the 622 through 630
 8 Jackson Street property. Okay?
 9 Let me ask you: Are you familiar with a
 10 company by the name of Solano Printers & Stationers?
 11 A. No.
 12 Q. Do you have any knowledge whatsoever with
 13 respect to any of the operations of Solano Printers &
 14 Stationers at the 622 through 630 Jackson Street
 15 property?
 16 A. No.
 17 Q. Do you have any knowledge with respect to any
 18 of the owners of Solano Printers & Stationers?
 19 A. No.
 20 Q. Do you know what type of business that was?
 21 A. Well, I know -- but I'm not really sure.
 22 Q. Okay. And, again, I don't want you to --
 23 A. I know the name. I'm not sure what they did.
 24 Q. Sure. And, Mr. Keilholtz, I don't want you to
 25 guess at anything here.

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1 A. No, I don't want to speculate at anything.
 2 Q. Thank you. It's not a sin to tell me, "I don't
 3 know."
 4 A. Okay.
 5 Q. Okay. Let me ask you: Were you ever familiar
 6 that a company by the name of Solano Printers &
 7 Stationers operated at the location that we've been
 8 speaking of, the 622 through 630 Jackson Street?
 9 A. No.
 10 Q. Okay. This is news to you?
 11 A. Yeah. I guess -- well, I don't know if I want
 12 to speculate, but I'm assuming that that's the name of
 13 the company that we bought that became Solano Printers &
 14 Lithographers.
 15 Q. So at some point in time you purchased a
 16 company that later became Solano Printers &
 17 Lithographers; is that correct?
 18 A. Actually, my father and John Clark bought the
 19 company.
 20 Q. And your father again is Roy Keilholtz?
 21 A. Correct.
 22 Q. And John Clark, Sr., correct?
 23 A. Correct.
 24 Q. Okay. And they purchased Solano Printers &
 25 Stationers; is that correct?

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1 A. Well, I'm not sure. As I said, I don't know
 2 what the name of the company was.
 3 Q. Okay. Well, let me ask you this: Was it your
 4 understanding that they had purchased a company that had
 5 operated at the 622 through 630 Jackson Street location?
 6 A. Yes.
 7 Q. Okay. But you had no knowledge as to what type
 8 of company that was?
 9 A. Well, I have a vague recollection as to what I
 10 thought the company did.
 11 Q. And what vague recollection as to what you
 12 thought the company did do you have?
 13 A. It did some letter press, and it was an old,
 14 what I call a job shop, that was kind of an additional,
 15 small little print shop.
 16 And I do believe it had a -- it sold standard
 17 forms and invitations, wedding announcements and things
 18 like that, that were actually purchased from other
 19 printers.
 20 So I think half of their business as I remember
 21 was kind of a -- other printed materials they didn't do,
 22 and the other half was just local letter press.
 23 Q. And do you know how many letter press machines
 24 operated at the 622/630 Jackson Street prior to Mr. --
 25 prior to your father and Mr. Clark's purchase of that

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1 business?
 2 A. No.
 3 Q. Do you know in what year your father and
 4 Mr. Clark, Sr., purchased the business -- just for ease,
 5 we'll call it Solano Printers & Stationers, okay -- do
 6 you know what year that they purchased that business?
 7 A. No.
 8 Q. Okay. Do you have an estimation?
 9 A. I really am off. When I talked to you, I think
 10 maybe mid '60s.
 11 Q. And is it your understanding that your father
 12 and Mr. Clark, Sr., operated a letter press printing
 13 operation at 622 through 630 Jackson Street?
 14 A. Yes.
 15 Q. Do you know for how many years?
 16 A. My recollection, maybe a year and a half.
 17 Q. Do you know the names of any of the letter
 18 press operators that operated at Solano Printers &
 19 Stationers?
 20 A. No, I do not. It was really a small company.
 21 I doubt there were more than two people.
 22 Q. Is your father still alive?
 23 A. No.
 24 Q. Do you know if John Clark, Sr., is still alive?
 25 A. He is not alive.

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1 Q. Okay. Well, let me ask you: Did your father
 2 have the knowledge and capability to run a letter press
 3 machine?
 4 A. Well, he was really a lithographer. But he
 5 could have run a letter press if he had to, but he never
 6 really did.
 7 Q. Okay. So to your knowledge he didn't operate
 8 the letter press machine during the operations of Solano
 9 Printers --
 10 A. No.
 11 Q. -- & Stationers at 622 Jackson?
 12 A. No.
 13 Q. During the time that Solano Printers &
 14 Stationers operated at the 622/630 Jackson location, did
 15 you ever go to that business?
 16 A. A few times.
 17 Q. Did you -- were you ever employed by Solano
 18 Printers & Stationers?
 19 A. No.
 20 Q. Okay. And the few times that you went there,
 21 what was the purpose of your visit?
 22 A. Probably to visit and see what was going on.
 23 Q. Now, are you aware that at that 622/630 Jackson
 24 Street location that there was a theater adjacent to the
 25 Solano Printers & Stationers?

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1 A. Yes, I remember that.
 2 Q. So the Solano Printers & Stationers building,
 3 that was -- that abutted the theater?
 4 A. I thought there was a space in between.
 5 Q. Okay. Let me ask you: During the time that
 6 Solano Printers & Stationers operated at the -- what
 7 we've been calling the 622/630 Jackson Street, how many
 8 spaces were in that area?
 9 A. What do you mean "spaces"?
 10 Q. Tenants, quartered-off partitions for tenants?
 11 A. Well, I don't remember if we had the whole
 12 building or we only had half of it.
 13 Q. That's what I'm trying to determine.
 14 A. I don't remember.
 15 Q. Okay. Do you recall that the building that at
 16 which Solano Printers & Stationers was operating,
 17 whether that building was adjacent to an alley?
 18 A. Vague recollection. I'm not sure.
 19 Q. Do you recall a back door that opened up to an
 20 alley?
 21 A. No.
 22 Q. Do you recall a back door that opened up to the
 23 back part of the building, which would have been the
 24 west side of the building?
 25 A. No.

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1 Q. Okay. Do you recall a door that opened up into
 2 a gated area which was in between the 622/630 Jackson
 3 property and the movie theater?
 4 A. No.
 5 Q. Do you recall any back access at that property
 6 during the time that Solano Printers & Stationers
 7 operated?
 8 A. No.
 9 Q. So it's your understanding that Solano Printers
 10 & Stationers operated at our 622/630 Jackson Street
 11 location for approximately one to one and a half years?
 12 A. Correct.
 13 Q. And then at that time, what happened with
 14 respect to Solano Printers & Stationers?
 15 A. It moved.
 16 Q. It moved?
 17 A. Uh-huh.
 18 Q. Where did it move to?
 19 A. Texas Street some place. I don't know the
 20 address, a small standalone building.
 21 Q. And is it -- well, let me ask you: Solano
 22 Printers & Stationers, that was purchased by what
 23 company?
 24 A. By John Clark -- well, I guess by Cal Central.
 25 Q. Okay. And at that time Cal Central changed the

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1 name to Solano Printers & Lithographers?
 2 A. I'm just speculating about that. Based on our
 3 conversation, I think that's probably what happened,
 4 because I don't remember that name "Stationers" at all,
 5 and we never used that name.
 6 Q. In total, how many years would you estimate --
 7 strike that.
 8 In total, how many years would you estimate
 9 that Solano Printers & Stationers operated at the
 10 622/630 Jackson Street?
 11 A. A year and a half.
 12 Q. Okay. Up until what point in time?
 13 A. Well, again, it depends on when we bought it.
 14 I don't remember.
 15 Q. Okay. So let me ask you: When you say "when
 16 we bought it," when --
 17 A. I'm speaking collectively for the organization,
 18 my father and his partner. So, obviously, I identify
 19 with them.
 20 Q. Okay. But what I'm trying to do is distinguish
 21 between your father's ownership of Solano Printers &
 22 Stationers and your ownership of Solano Printers &
 23 Lithographers.
 24 A. To the best of my recollection, when John and
 25 my dad bought the company, they put it in my name and

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1 Dave's name.
 2 And I don't even remember any discussion, but I
 3 assume it was one of those family things where they felt
 4 it was the right way to do it. Maybe they had tax
 5 advice. I don't know.
 6 Q. Okay. So then, to your knowledge, your father
 7 and Mr. Clark, Sr., never did in fact own Solano
 8 Printers & Stationers?
 9 A. Not in name, no. I don't think they ever had
 10 the name on anything.
 11 Q. Okay. And then Solano Printers & Stationers
 12 was purchased by Cal Central Press?
 13 A. No.
 14 Q. Okay. Where am I wrong on that?
 15 A. Because I think it was always -- oh, under the
 16 name, regardless of who owned it, it was under the name
 17 of myself and Dave, I believe.
 18 Q. Okay.
 19 A. And then when it moved to Texas Street, myself,
 20 Dave Clark and Ed Peabody built the building that it
 21 moved to.
 22 Q. So did you all ever operate Solano Printers &
 23 Lithographers at the 622/630 Jackson Street?
 24 A. Did -- I don't understand your question.
 25 Q. Sure. Well, let me ask you this: Did Solano

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1 Printers & Lithographers ever operate at the
 2 622/630 Jackson Street?
 3 A. I believe so.
 4 Q. Okay. For how many years?
 5 A. A year and a half.
 6 Q. Okay. See, that's where I'm getting confused,
 7 because I thought in my questions before to you, I was
 8 speaking of Solano Printers & Stationers, and I thought
 9 that you had indicated to me that they operated there
 10 for a year and a year and a half.
 11 A. I don't know how long they operated. That's
 12 what I said earlier. I'm not aware of that name at all.
 13 So when you used it, I was talking specifically
 14 about Solano Printers & Lithographers, which I am
 15 assuming at this point since you've gone through the
 16 records is the company that we -- the name that we used
 17 once we bought that Stationers.
 18 But I'm not even sure that's true, but that's
 19 what I'm speculating based on what you're saying and
 20 asking.
 21 Q. Sure. And, Mr. Keilholtz, I don't want you to
 22 speculate or guess as to what I'm thinking or try to
 23 figure that out.
 24 A. That's what's causing the confusion over this
 25 year and a half thing.

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1 Q. Okay. Okay. All's I'm trying to get from you
 2 is your best recollection of the operations --
 3 A. Right.
 4 Q. -- and who operated and the names they
 5 operated.
 6 A. And I did say that I have absolutely no
 7 recollection of that Stationer's company.
 8 Q. Okay. So then to your best recollection, your
 9 father and John Clark, Sr., were operating Solano
 10 Printers & Lithographers at the 622/630 Jackson Street?
 11 A. I -- I don't know what you mean by "operating."
 12 I mean, they certainly weren't running day-to-day
 13 operations.
 14 Q. They owned a business called Solano Printers &
 15 Lithographers -- and when I say "they," I mean your
 16 father and John Clark, Sr. -- that operated at the
 17 622/630 Jackson Street location, correct?
 18 A. Right.
 19 Q. Okay. And to your knowledge, they operated at
 20 that location for a year and a half; is that correct?
 21 A. Right.
 22 Q. Approximately a year and a year and a half.
 23 A. There are a whole group of companies that John
 24 and dad bought, and all of them were not -- I mean, they
 25 were all under Cal Central. And at that time I had a

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1 key position at Cal Central, but my dad was still and
 2 John were still principals.
 3 So you have to understand this gets really
 4 muddled because we had at one point something like 11
 5 corporations. This was the smallest of all of them and
 6 the one that got the least attention.
 7 Most of the companies, once they were
 8 purchased, were run by the person we bought it from. In
 9 that case, of Solano Printers & Lithographers, whatever
 10 it was called before, we sent one of our employees, Jack
 11 Whalley, down to run it. And he was really responsible
 12 for the day-to-day operation.
 13 And you had his name because you mentioned it
 14 when I talked to you on the phone.
 15 Q. So to your knowledge, Jack Whalley went down
 16 and operated Solano Printers & Lithographers, correct?
 17 A. Correct.
 18 Q. Okay. And that was at the 622/630 Jackson
 19 Street?
 20 A. Correct.
 21 Q. Okay. Do you know approximately what year
 22 those operations started?
 23 A. I said I don't remember.
 24 Q. Okay. I thought when you said you didn't
 25 remember, we were speaking of Solano Printers &

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1 Stationers.
 2 A. Yes, and remember, I said I don't know what
 3 that is.
 4 Q. I heard that later.
 5 A. Right.
 6 Q. Okay. After I went through a host of questions
 7 about Solano Printers & Stationers.
 8 A. So the year and a half applies, and I think I
 9 said earlier it may be around '65, but I'm guessing.
 10 Q. Okay. And Jack Whalley, is that how you
 11 pronounce it?
 12 A. Whalley.
 13 Q. Whalley.
 14 A. It's spelled like Whalley. I can see why you'd
 15 call it that, but it's Whalley. That's how he
 16 pronounced it.
 17 Q. Okay. And Jack Whalley, he was actually
 18 employed by Solano Printers & Lithographers, or was he
 19 employed by a different company?
 20 A. I don't know where he got his check from. It
 21 could have been coming from Cal Central and News
 22 Publishing.
 23 He was an employee of New Publishing, on their
 24 payroll, one of the three -- one of the two operating
 25 companies under Cal Central, and he went down to take

18 (Pages 66 to 69)

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1 over that company in Fairfield.
 2 Whether or not he maintained or remained on the
 3 payroll of News Publishing, I do not know.
 4 Q. Okay.
 5 MR. GRAHAM: All right. I think this is a good
 6 time to take a break. Let's take about a 10-minute
 7 break, and we'll get back.
 8 (Recess taken.)
 9 MR. GRAHAM: Back on.
 10 Q. Mr. Keilholtz, I'll remind you, even though
 11 we've taken a break, you're still under oath.
 12 A. I understand.
 13 Q. Before we took the break, we were talking a
 14 little bit about the operations of Solano Printers &
 15 Lithographers and Solano Printers & Stationers at the
 16 622/630 Jackson Street property.
 17 You recall that?
 18 A. Yes.
 19 Q. Okay.
 20 MR. GRAHAM: What I'm going to do is mark the
 21 next.
 22 (Whereupon Exhibit No. 2 was then marked for
 23 identification.)
 24 BY MR. GRAHAM:
 25 Q. Mr. Keilholtz, I'll direct your attention to

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1 what's been marked as Exhibit 2 to your declaration.
 2 Do you have that in front of you?
 3 A. Yes.
 4 Q. Okay. And just for the record, this is the
 5 1961 City Directory produced, and it's Bates JH 10113 to
 6 JH 10120. And the date of the directory is 1961.
 7 MR. NICKOVICH: Excuse me, did you say -- call
 8 this an exhibit to his declaration?
 9 MR. GRAHAM: I may have -- yeah, I did. Thank
 10 you, Counsel.
 11 Q. Exhibit 2 to your deposition.
 12 Mr. Keilholtz, do you have that in front of
 13 you?
 14 A. Yes.
 15 Q. Okay. What I'd like to -- if you look at the
 16 bottom right-hand corner, you'll see what we refer to as
 17 Bates stamps, and they start with "JH."
 18 A. Right.
 19 Q. If I could direct your attention to the page
 20 that's marked JH 10117.
 21 A. (Witness complied.) Okay.
 22 Q. Are you there?
 23 A. Yes.
 24 Q. Okay. I'd like to direct your attention to
 25 about a third down the page, under the title "Greeting

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1 Cards."
 2 Do you see that?
 3 A. Yes.
 4 Q. States, "Solano Printers & Stationers."
 5 Do you see that?
 6 A. Right.
 7 Q. Again, this is a 1961 guide. Does this
 8 document in any way refresh your recollection that as of
 9 1961, or at least in 1961, that Solano Printers &
 10 Stationers was operating at the 622 Jackson Street
 11 location?
 12 A. It certainly shows it existed.
 13 MR. NICKOVICH: I'm going to object. It's been
 14 asked and answered.
 15 BY MR. GRAHAM:
 16 Q. Does this refresh your recollection, sir?
 17 A. Well, it doesn't refresh my recollection, but
 18 it shows that it existed.
 19 Q. Okay.
 20 A. And there's two entries here. There's one at
 21 the top under "Gift Shops."
 22 Q. Yes, sir.
 23 A. So it looks like they did greeting cards and
 24 gift shops.
 25 Q. If that doesn't help refresh your recollection,

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1 that's all I have for you on that one.
 2 A. Okay.
 3 Q. Okay. Mr. Keilholtz, do you know what year
 4 that Solano Printers & Lithographers was incorporated?
 5 A. No.
 6 Q. Do you know what parties or what persons
 7 incorporated Solano Printers & Lithographers?
 8 A. Well, I am really at a loss because I thought
 9 the company was set up in the name of myself and Dave
 10 Clark, so I don't remember that it was incorporated.
 11 Q. Okay.
 12 A. So my facts seem unclear.
 13 Q. Okay.
 14 A. My memory is unclear.
 15 MR. GRAHAM: No. 3.
 16 (Whereupon Exhibit No. 3 was then marked for
 17 identification.)
 18 BY MR. GRAHAM:
 19 Q. All right. Mr. Keilholtz, I've handed to you
 20 what's been marked as Exhibit 3 to your deposition here
 21 today. You can take as much time to review this as you
 22 like, or as little time. I only have a few questions.
 23 Let me know when you're ready.
 24 A. (Witness complied.) Okay.
 25 Q. Mr. Keilholtz, have you ever seen this document

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1 before?
 2 A. I certainly don't remember, but I probably
 3 have.
 4 Q. Okay. And for the record, this is the Articles
 5 of Incorporation of Solano Printers & Lithographers?
 6 A. Correct.
 7 Q. And I'd like to direct your attention to the
 8 page 4 of this document.
 9 And you see under the list there it states
 10 names, and there's the name of "Kathleen Baker."
 11 Do you see that?
 12 A. Yes.
 13 Q. Do you know who Kathleen Baker is?
 14 A. Absolutely no idea.
 15 Q. Same question, do you know who Donna Booth is?
 16 A. No.
 17 Q. Do you know how -- strike that.
 18 Do you know who Doris R. Munn is?
 19 A. No.
 20 Q. Do you know who Wilma Sharp is?
 21 A. No.
 22 Q. Do you know who Annette Verga is?
 23 A. No.
 24 Q. Okay. To your knowledge, does this appear to
 25 be the Articles of Incorporation of the company that you

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1 were involved in, Solano Printers & Lithographers?
 2 A. It appears to be. And the date would tie into
 3 my '65 date, and the -- it looks reasonable to assume
 4 that.
 5 I don't know why these people are there, but I
 6 guess it was some kind of a routine you went through
 7 where you use a bank to set this thing up. I don't
 8 understand that.
 9 Makes me think that Cal Central was using
 10 Crocker Citizens at that time.
 11 Q. And Crocker Citizens is a bank?
 12 A. I'm assuming that because that's what it says.
 13 Q. After Citizens Bank Building; is that what
 14 you're referring to?
 15 A. Crocker Citizens Bank Building.
 16 Q. Okay.
 17 A. But I think that would be Crocker Citizens.
 18 And I have a vague recollection of that name.
 19 Q. How do you have a recollection of that name?
 20 A. Well, I've been in Sacramento a long time, so,
 21 you know, 500 -- I don't know.
 22 Q. I'm sorry?
 23 A. No, forget it. No, I'm assuming that's a bank.
 24 Q. And do you have a recollection of Solano
 25 Printers & Lithographers utilizing this 500 Crocker

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1 Citizens Bank Building that we were speaking of?
 2 A. No.
 3 Q. Okay. Now, with respect to Solano Printers &
 4 Lithographers, were you an officer of that company?
 5 A. I don't know.
 6 Q. Do you know who were the officers of that
 7 company?
 8 A. No.
 9 Q. Were you a director of that company?
 10 A. I don't know. Again, I mentioned all these
 11 corporations, so we did each one a little bit
 12 differently.
 13 Q. Okay. And right now I'm only speaking with
 14 respect to Solano --
 15 A. I realize that. But, again, I -- it's 40 years
 16 ago.
 17 Q. That's fine. And, again, an "I don't know"
 18 answer is fine.
 19 Now, I think you indicated earlier, and tell me
 20 if I'm wrong, that the operation known as Solano
 21 Printers & Stationers, they used a letter press for
 22 their printing operations at 622 through 630 Jackson
 23 Street; is that correct?
 24 A. That's what I think.
 25 Q. Okay. And Solano Printers & Lithographers,

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1 they eventually relocated to 622/630 Jackson Street, or
 2 began operations at that location; is that correct?
 3 A. Began operations.
 4 Q. Began operations there?
 5 And do you know for how many years that Solano
 6 Printers & Lithographers operated at the 622/630 Jackson
 7 Street?
 8 A. What I said, a year and a half.
 9 Q. A year and a half.
 10 Now, when the Solano Printers & Lithographers
 11 began operations at 622/630 Jackson Street, what types
 12 of presses did they use at that location?
 13 A. Well, they would have used whatever the prior
 14 company had, which I'm assuming is letter press.
 15 Q. Why do you believe that they would have used
 16 what the other company had?
 17 A. Well, because we took over that company. We
 18 bought it. We wouldn't bring in new equipment.
 19 Q. That's what I'm trying to figure out.
 20 A. Well, we wouldn't have done it.
 21 Q. Why not?
 22 A. We would have brought in new equipment later if
 23 we changed the nature of the business. And I'm sure we
 24 did.
 25 I think we tossed out all of the stationery

20 (Pages 74 to 77)

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1 stuff and the gift stuff and whatever was -- tossed out
 2 all of the extraneous stuff and went to be strictly a
 3 printing company because that's what we knew.
 4 Q. So to your knowledge, when Solano Printers &
 5 Lithographers began operations at the 622/630 Jackson
 6 Street, they were using letter press printing?
 7 A. They were using equipment from the prior
 8 company.
 9 Q. And do you know what equipment that was?
 10 A. No, I do not.
 11 Q. Do you know how many letter presses that there
 12 were?
 13 A. I do not.
 14 Q. Do you know if there was any other associated
 15 printing equipment other than the letter presses that
 16 had been previously used at the 622/630 Jackson Street?
 17 A. That would have been a hot metal machine or
 18 two, a Linotype probably, L-i-n-e-o-t-y-p-e (sic), one
 19 word, and hot metal type setting cases.
 20 Q. Anything else?
 21 A. No.
 22 Q. Okay. But you know there was at least one
 23 letter press machine?
 24 A. I'm assuming there was one because I know I
 25 would buy it otherwise.

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1 Q. Okay. So to your knowledge, Solano Printers &
 2 Lithographers, when they began operation at the
 3 622/630 Jackson Street, when they began operations
 4 there, they were using strictly the equipment that had
 5 been previously used there by Solano Printers &
 6 Stationers?
 7 A. That is my recollection to the best of my
 8 ability.
 9 Q. Okay. Now, at any point in time prior to the
 10 time that Solano Printers & Lithographers ceased
 11 operations at the 622/630 Jackson Street site, prior to
 12 that time, did Solano Printers & Lithographers purchase
 13 any new equipment or put any other press equipment at
 14 that location?
 15 A. I have no idea. I don't remember.
 16 Q. Do you know who would remember that?
 17 A. No, except maybe Jack Whalley.
 18 Q. Is there -- let me ask you: Is there someone
 19 from -- that was affiliated with Solano Printers &
 20 Lithographers that would have more knowledge on that
 21 subject than yourself?
 22 A. Because, remember, it's a small company, a few
 23 people. Jack Whalley would be the only guy that could
 24 probably remember that. I know he's dead.
 25 Q. Other than Mr. Whalley, were there any other

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1 employees or persons that worked for Solano Printers &
 2 Lithographers at the 622/630 Jackson Street location?
 3 A. I have no idea. I mentioned to you Jim Liles,
 4 and I don't know when he joined the company, L-i-l-e-s.
 5 And I think he joined the company after we moved to the
 6 new location, but I'm not sure.
 7 Q. And that new location you're speaking of, that
 8 was --
 9 A. Some place on Texas.
 10 Q. Sure. Let me just finish so we get a clear
 11 record.
 12 So Mr. Whalley was a Linotype operator?
 13 A. Yes, he was.
 14 Q. Okay. What are hot metal cases?
 15 A. Did I say "hot metal cases"?
 16 Q. I think so. Or you said hot metal printing --
 17 A. I probably did, and I mixed the terms. The job
 18 cases are what you kept standard type in, so you'd go
 19 and you'd hand-pick the type, if you were doing
 20 something like an invitation or something short run.
 21 If you had a larger project like a law book,
 22 you would then use the Linotype machine, and that
 23 machine would cast the type and create what they call a
 24 pick, and that would have a whole group.
 25 So it's all kind of hot metal process, but the

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1 job case -- and then we had what was called a California
 2 job case, had a particular arrangement of the letters so
 3 you knew where to pick them from.
 4 Q. Okay. During the time that Solano Printers &
 5 Lithographers operated at the 622/630 Jackson Street,
 6 are you aware of any repairs that needed to be done on
 7 any of the press equipment?
 8 A. You know, that kind of equipment didn't take
 9 much repairing. It just kept running, and people knew
 10 how to hold the stuff together, so I don't ever remember
 11 repairs on the letter press.
 12 I'm sure it happened, but it really wasn't a
 13 common thing. People held stuff together in those days
 14 by shoestrings.
 15 Q. Let me ask you: During the time that Solano
 16 Printers & Lithographers operated at the 622/630 Jackson
 17 Street, during that time period, how often would you say
 18 that you were actually present at that location?
 19 A. I think I said earlier, maybe a half a dozen or
 20 a dozen times. I don't know.
 21 Q. And I just want to be clear because I think
 22 there was a little confusion between us earlier with
 23 respect to Solano Printers & Stationers versus Solano
 24 Printers & Lithographers.
 25 So you did visit the Solano Printers &

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1 Lithographers approximately a half a dozen times during
 2 the time period that it was in operation at the
 3 622/630 Jackson Street?
 4 A. Correct.
 5 Q. Okay. Did you ever operate any of the printing
 6 presses during the time that Solano Printers &
 7 Lithographers operated at the 622/630 Jackson Street?
 8 A. No.
 9 Q. Okay. Were you ever involved in any of the
 10 cleaning operations of any of the presses during the
 11 time that Solano Printers & Lithographers operated at
 12 the 622/630 Jackson Street?
 13 A. No.
 14 Q. Okay. Other than Jim Whalley, can you think of
 15 any other person that would be involved with respect to
 16 any of the cleaning of any of the presses, cleaning of
 17 any of the rollers, any of the cleaning of the equipment
 18 for Solano Printers & Lithographers during the time that
 19 they operated at the 622/630 Jackson Street location?
 20 A. No.
 21 Q. Did Solano Printers & Lithographers ever
 22 operate at a location on Bell Street?
 23 A. Not to my knowledge. I never heard of Bell
 24 Street.
 25 Q. Okay. And you're not familiar with any changes

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1 in equipment or changes in the operational processes
 2 that were conducted by Solano Lithographers during their
 3 operations -- during the entirety of their operations at
 4 the 622/630 Jackson Street location?
 5 A. Yeah, I'm not aware of any.
 6 Q. Okay. And other than Jack Whalley, who else
 7 would have knowledge of that type of information?
 8 A. He would really be the only person that I know
 9 of that would really have the knowledge. My dad and
 10 John Clark might have, but they wouldn't even know the
 11 detail he would. And of course, all three of them gone.
 12 Q. What about Mr. --
 13 A. Liles I referred to. I'm not sure when he came
 14 into the picture. So if he came in after we had moved
 15 to the new location, he probably wasn't very aware of
 16 the configuration at the -- at the site that we're
 17 talking about.
 18 Q. Okay. And are you aware of the configuration
 19 at the site that we're speaking of?
 20 A. No, I can't remember what it looked like. You
 21 asked me about the doors. I have no recollection at
 22 this time after 45 years where our doors were.
 23 Q. That's fine. That's fine.
 24 A. I wonder how many people would.
 25 Q. Well, you'd be amazed.

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1 A. Maybe not when they're 75.
 2 Q. You'd be amazed.
 3 A. Maybe I'm stupid.
 4 Q. I'm not implying that. Don't infer that.
 5 The operations at the 622/630 Jackson Street
 6 locations with respect to Solano Printers &
 7 Lithographers, during the time that Solano Printers &
 8 Lithographers was operating at that location, they did
 9 not own that property, did they?
 10 A. No.
 11 Q. Okay. Do you know during the time that Solano
 12 Printers & Lithographers operated at the 622/630
 13 location who owned that property?
 14 A. I do not.
 15 Q. And did Solano Printers & Lithographers enter
 16 into any type of lease or rental agreement with the
 17 landlords with respect to Solano Printers &
 18 Lithographers use of the 622/630 Jackson Street
 19 property?
 20 A. Well, I would assume that -- I would assume as
 21 a business practice there'd be some type of lease, but I
 22 have no idea what is or what it was.
 23 Q. Do you recall yourself entering into --
 24 A. No.
 25 Q. Let me finish my question.

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1 A. I'm sorry.
 2 Q. Do you recall yourself entering into any lease
 3 with respect to Solano Printers & Lithographers'
 4 operations at the 622/630 Jackson Street property?
 5 A. No, and I doubt if I would have been involved.
 6 Q. Who would have?
 7 A. Probably my dad.
 8 Q. Anyone else that you can think of?
 9 A. No. He was really the manufacturing guy, and
 10 he's the one that knew the people that owned it.
 11 Q. When you say he was "the manufacturing guy,"
 12 what do you mean?
 13 A. Well, his partner was really in charge of
 14 sales, and Dad was always -- he had part- -- he was
 15 always the guy that ran the back plant thing. He was
 16 the operations guy.
 17 Q. Okay. And "his partner," that's Mr. Clark,
 18 Sr., correct?
 19 A. Correct.
 20 Q. All right. During the time that Solano
 21 Printers & Lithographers operated at the 622/630 Jackson
 22 Street location, what were their hours of operation at
 23 that location, do you recall?
 24 A. Probably 8:00 to 5:00.
 25 Q. Five days a week?

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1 A. Five days a week. It was not a big operation,
 2 so -- in the printing industry there's usually some
 3 overtime, so once in awhile probably somebody worked
 4 late at night or came in on the weekend.
 5 But the regular hours would have been 8:00 to
 6 5:00 at the most, five days a week.
 7 Q. And with respect to -- well, let me ask you:
 8 Do you know precisely what the address was of the
 9 location of Solano Printers & Lithographers at the
 10 Jackson Street?
 11 A. Do I know?
 12 Q. Yeah.
 13 A. Well, we've been using it all the time,
 14 622/630.
 15 Q. Okay. Well, I guess what I'm asking you, more
 16 specifically, do you know if it was 622 --
 17 A. No.
 18 Q. -- 624, 630?
 19 A. I don't know.
 20 Q. Okay. And we'll just call it the Jackson
 21 Street location. Is that okay with you?
 22 A. Fine.
 23 Q. Okay. Solano Printers & Lithographers'
 24 operations at the Jackson Street location, was there a
 25 prepress room at that location?

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1 MR. NICKOVICH: I'm going to object. I think
 2 because there's multiple Jackson Street locations in the
 3 litigation. We shouldn't be using that term.
 4 MR. GRAHAM: That's probably true. Okay. I'll
 5 go back to 622/630.
 6 Q. Let me give you my question again,
 7 Mr. Keilholtz.
 8 (Whereupon the reporter read back the following
 9 testimony:
 10 "Q. Okay. Solano Printers &
 11 Lithographers' operations at the Jackson
 12 Street location, was there a prepress
 13 room at that location?")
 14 BY MR. GRAHAM:
 15 Q. And by "that location," I'm referring to the
 16 622/630 Jackson Street location to which we've been
 17 referring to earlier.
 18 A. I do not believe there was.
 19 Q. Okay. Okay. So there was a press room,
 20 correct?
 21 A. Correct.
 22 Q. Okay. And were there offices at that location,
 23 also?
 24 A. There was a little walk-in area where a
 25 customer could come and stand. And if I remember, there

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1 was a wall between the back plant and the front, but I'm
 2 not even sure of that.
 3 Q. Okay. Do you know whether Mr. Whalley had an
 4 office at the 622/630 Jackson Street location?
 5 A. He wouldn't have had an office. He's working
 6 out back. We'd sit in the front, you know, when
 7 customers walk in. Probably had a desk there.
 8 Q. Okay. Do you know of anyone else who had an
 9 office at that 622/630 location, the Jackson location,
 10 during the time that Solano Printers & Lithographers
 11 operated?
 12 A. No.
 13 Q. Do you know during the time that Solano
 14 Printers & Lithographers operated at the 622/630 Jackson
 15 location, who was in charge of ordering supplies?
 16 A. Jack Whalley.
 17 Q. Jack Whalley?
 18 What about ordering cleaners?
 19 A. Jack Whalley.
 20 Q. And solvents?
 21 A. Jack Whalley.
 22 Q. Okay. During the time that Solano Printers &
 23 Lithographers operated at the 622/630 Jackson Street
 24 location, do you recall that Mr. Clark, Jr., had any
 25 role in the operations or running of Solano Printers &

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1 Lithographers?
 2 A. Same as myself, none.
 3 Q. None.
 4 Same question with respect to Mr. David Clark?
 5 A. None.
 6 Q. None.
 7 A. John Clark wasn't even working for the company
 8 I don't think when we bought it.
 9 Q. I'm sorry?
 10 A. John Clark, Jr. You mentioned John Clark.
 11 John Clark, Jr., came to work somewhere around '67, '68
 12 for Cal Central Press.
 13 Q. Okay. So did you have any roles or duties with
 14 respect to the operations of Solano Printers &
 15 Lithographers at the 622/630 Jackson Street location?
 16 A. No.
 17 Q. Not at all?
 18 A. Not at all.
 19 Q. No, you didn't directly supervise any
 20 employees?
 21 A. No.
 22 Q. Who was Mr. Whalley's supervisor?
 23 A. You know, we didn't have a formal chain of
 24 command. I guess he would take directions from either
 25 John or dad.

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1 Q. Okay. Was there a foreman at that location?
 2 A. It would have been Jack Whalley.
 3 Q. Okay.
 4 A. It was probably a two- or three-man operation.
 5 Q. Okay. And why do you say that?
 6 A. It was really small. I think when he got it,
 7 it was doing less than 100,000 a year volume.
 8 Q. Okay.
 9 A. Half of the 100,000 was the front stuff, the
 10 greeting cards and invitations and so on that weren't
 11 done in the plant.
 12 Q. Okay. 100,000 a year volume, you mean with
 13 respect to dollars?
 14 A. Dollars.
 15 Q. Okay. And do you know what types of jobs that
 16 Solano Printers & Lithographers conducted with respect
 17 to printing operations at the 622/630 Jackson Street
 18 location?
 19 A. I really don't -- I can't say for sure, but
 20 knowing the equipment and the nature of the time, it
 21 would have just been local walk-in stuff where somebody
 22 did a little form for their business or a short run,
 23 maybe a little letter, a newsletter for a local
 24 organization.
 25 I mean, it really would have been very, very

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1 short run printing, and not particularly quality
 2 looking. And it would have all been black.
 3 Q. No color?
 4 A. No color.
 5 Q. Do you remember any of the clients of Solano
 6 Printers & Lithographers when they operated at the
 7 622/630 Jackson Street?
 8 A. Not at all.
 9 Q. How about Wells Fargo, were they a client
 10 during the time that Solano Printers & Lithographers
 11 first operated at 622/630 Jackson Street?
 12 A. I think the bank's -- excuse me.
 13 MR. GRAHAM: That's fine. Let's go off the
 14 record.
 15 (Interruption off the record.)
 16 (Whereupon the reporter read back the following
 17 testimony:
 18 "Q. How about Wells Fargo, were
 19 they a client during the time that
 20 Solano Printers & Lithographers first
 21 operated at 622/630 Jackson Street?")
 22 THE WITNESS: We started to do some bank checks.
 23 And I don't really remember it being Wells Fargo; I
 24 thought it was Bank of California. But I don't know
 25 whether we started that check program after we had moved

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1 or not.
 2 But I'm certainly aware the check was a big
 3 business. It was big -- it was bigger than what they had
 4 at Fairfield when we took over.
 5 BY MR. GRAHAM:
 6 Q. Okay. Do you recall any of the different types
 7 of papers that were used to print on at the -- strike
 8 that.
 9 In the operations of Solano Printers &
 10 Lithographers at the 622/630 Jackson Street location, do
 11 you recall whether or not that they did any of the
 12 printing jobs on glossed paper?
 13 A. I'm almost sure they didn't.
 14 Q. Okay. Why are you sure that they didn't?
 15 A. Because it wasn't the kind of product what I
 16 described was typically a product that was done on
 17 uncoated stock because that's what letter press was not.
 18 Letter press didn't suit itself to the glossier
 19 stocks. It didn't have the fine -- it just didn't have
 20 the characteristics.
 21 Q. When you say it "didn't have the
 22 characteristics," what do you mean?
 23 A. Letter press was not a quality -- I mean, think
 24 of the Gutenberg Bible, that was letter press, but, you
 25 know, it never did really beautiful stuff.

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1 When lithography came around, it was able to
 2 print a much better picture and do a better color job.
 3 So in the mid-'50s most of our printing in
 4 America switched from letter press to offset or
 5 lithography.
 6 Q. And the letter press that was -- strike that.
 7 In the operations of Solano Printers &
 8 Lithographers at the 622/630 Jackson Street, the letter
 9 presses that they were utilizing, were those sheet-fed
 10 or web-fed?
 11 A. Oh, sheet-fed.
 12 Q. Sheet-fed?
 13 Do you recall how many impressions per hour
 14 that the letter press would do over at the
 15 622/630 Jackson Street location?
 16 A. No, but I'd be -- they'd be lucky if they get
 17 1200 to 2,000.
 18 Q. Why is that?
 19 A. Because they're slow. They're slow presses.
 20 Q. Do you recall what type of press it was?
 21 A. No.
 22 Q. The make or model?
 23 A. No.
 24 Q. Do you know if it was the Heidelberg press?
 25 A. Could have been a Heidelberg.

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1 Q. Why do you say it "could have been a
 2 Heidelberg"?

3 A. Well, there were a number of brands or
 4 manufacturers of letter press equipment, one of which
 5 was Heidelberg.

6 Q. Sure.

7 And what makes you believe that the Heidelberg
 8 letter press was actually at the location --

9 A. I didn't say I did believe it. I said it could
 10 have been a Heidelberg.

11 Q. Sure. And just give me one second to let me
 12 finish my question. I'll try to get you out of here as
 13 soon as I can, sir, but I gotta finish my question.

14 I understand there were a number of brands, but
 15 do you specifically recall that there was a Heidelberg
 16 press located at the 622/630 Jackson Street during the
 17 operations of Solano Printers & Lithographers?

18 A. And I said it could have been.

19 Q. Okay. And then I think I asked you why do you
 20 think it could have been.

21 A. Because that was a very common brand.

22 Q. Other than the fact that it was a very common
 23 brand, is there anything else that leads you to believe
 24 that there was a Heidelberg press operated by Solano
 25 Printers & Lithographers at the 622/630 Jackson Street

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1 location?

2 A. No.

3 Q. Do you recall if it was a Chandler & Price?

4 A. That's going back. That's pretty old
 5 equipment. So, again, I'd speculate, it probably wasn't
 6 that either, or that it wasn't that at all because of
 7 the fact that's a really old -- I think they were
 8 probably bankrupt by the time I was alive.

9 Q. Okay. Since we're talking about the press,
 10 let's -- let me ask you: The letter presses that you
 11 believed were located at the 622/630 Jackson Street
 12 location during the operations of Solano Printers &
 13 Lithographers, were those hand presses?

14 A. Again, I really don't know.

15 Q. Okay. So you couldn't tell me whether that was
 16 a hand press, a table top --

17 A. My speculation would be we had one hand press
 18 over there and probably had an automated --
 19 automatically fed letter press. That would be my
 20 speculation knowing the time and the nature of job shops
 21 in that period of time.

22 Q. Okay. So based upon the information that you
 23 know, you believe that there was a hand press at that
 24 location during the operations of Solano Printers &
 25 Lithographers, and also an automatic feed press?

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1 A. Right.

2 Q. Okay. Now, do you know -- you said the
 3 impressions per hour would be somewhere between 1200 and
 4 2,000. For each of those --

5 A. No, it would be slower for hand feed. The hand
 6 feed, probably five or 600.

7 Q. Okay. That's what I'm -- and then for the
 8 automatic we're looking at the 1200 to 2,000?

9 A. Correct.

10 Q. I'm sorry?

11 A. Yes, correct.

12 Q. Do you know if this hand press -- that's a
 13 manually-operated press, right?

14 A. Correct.

15 Q. And that's manually cleaned?

16 A. Well, yeah, by the operator.

17 Q. As opposed to an automatic clean?

18 A. Yeah.

19 Q. Okay.

20 A. None of these presses had automatic clean at
 21 that time. Automatic fade wouldn't have had an
 22 automatic clean. The guy still has to clean it up.

23 Q. When did the automatic clean -- approximately
 24 what year did those come into being?

25 A. Automatic cleaning on offset started probably

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1 in the '80s.

2 Q. Oh, okay. Okay. I beg your pardon. Bear with
 3 me, Mr. Keilholtz. I'm not a press operator.

4 A. I know.

5 Q. Okay. You ascertained that.

6 Were these heat set presses that were used by
 7 Solano Printers & Lithographers at the 622/630 Jackson
 8 Street location?

9 A. No. And to clarify, heat set wasn't -- that
 10 also was something that came later.

11 Q. Okay. So then those presses were referred to
 12 as blanket-to-blanket presses?

13 A. No.

14 Q. "No"?

15 A. You never use that term in letter press.

16 Q. Okay. What is that term used for?

17 A. Blanket-to-blanket is a term for lithography or
 18 offset.

19 Q. Gotcha.

20 A. And, in fact, that's really a term for web
 21 presses -- well, you don't want the detail.

22 Q. Sure, I do.

23 A. Well, if you're running a web press, you're
 24 putting ink on both sides of the paper. And the sheet
 25 is going through -- you've got a roll of paper at the

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1 end, and you're putting the sheet through.
 2 And you've got a blanket here, and a blanket
 3 here (indicating), and the sheet is going between the
 4 blanket. And the image is being transferred on the top
 5 of the sheet and on the bottom of the sheet
 6 simultaneously, with the two rollers causing the
 7 pressure that lets the impression take place -- lets the
 8 image be transferred or take place.
 9 And then it comes out the other end, either
 10 folded in the product, depending if there's a folder in
 11 line, or it comes out sheeted.
 12 And sometimes those presses have heat set like
 13 you talked about, and sometimes they don't. But you're
 14 using really terms that don't have anything to do with
 15 sheet-fed letter press or litho.
 16 Q. Okay. Great, thank you. Thank you.
 17 Now, the presses that we've been discussing,
 18 the hand press and the automatic feed press that's
 19 located at the 622/630 Jackson Street during the
 20 operations of Solano Printers & Lithographers, do you
 21 have any information with respect to how often, say, the
 22 hand press would need to be cleaned?
 23 A. Well, it would depend on how often they used
 24 it, but probably -- the nature of letter press was such
 25 that they probably cleaned the things up about once a

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1 week, not like offset or lithography.
 2 Q. Okay. And how is offset different with respect
 3 to the cleaning?
 4 A. Because you've got the rubber blanket involved
 5 in offset. You've got to clean the situation -- you've
 6 got to clean it up because the ink's dry, the stuff
 7 solidifies, you've got to get it off your blanket, and
 8 you've got to get it out of your ink tray.
 9 So you need regular cleanup, and you clean up
 10 at the end of every day or before changing colors on
 11 your press.
 12 In the case of letter press, it can sit there.
 13 The ink doesn't really -- it's a little bit different.
 14 The ink really doesn't -- you can let it sit. It's a
 15 little different ink, you can let it sit.
 16 Q. For a day to two days?
 17 A. Uh-huh, people usually did.
 18 Q. Do you have any knowledge, Mr. Keilholtz, with
 19 respect to any chemicals or washes that were used in the
 20 operations of Solano Printers & Lithographers at the
 21 622/630 Jackson Street?
 22 A. No.
 23 Q. You don't recall any brand names?
 24 A. No.
 25 Q. Okay. Let's talk about the building over at

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1 the 622/630 Jackson Street location.
 2 When Solano Printers & Lithographers first
 3 started operating at that location, was that a two-story
 4 building?
 5 A. No, I don't think so. I'm surprised you even
 6 asked. I thought it was one store.
 7 Q. Let me ask you: Did it have a mezzanine that
 8 went up?
 9 A. I don't remember that.
 10 Q. How high would you estimate the ceiling was?
 11 A. 14-foot to 18-foot.
 12 Q. During the time that Solano Printers &
 13 Lithographers operated at the 622/630 Jackson Street
 14 location, are you aware of any of the names of any of
 15 the tenants that occupied the buildings adjacent to
 16 Solano Printers & Lithographers?
 17 A. Not at all.
 18 Q. Okay. Do you know how many shifts there were
 19 during the operations of Solano Printers & Lithographers
 20 at the 622/630 Jackson location?
 21 A. One.
 22 Q. One. And that's the 8:00-to-5:00 shift,
 23 correct?
 24 A. Uh-huh.
 25 Q. Okay. Did that change over a period of time

101

1 during the time that Solano Printers & Lithographers
 2 operated? Did it change seasonally, anything of that
 3 nature?
 4 A. No, it was probably always one shift.
 5 Q. Okay. During the time that Solano Printers &
 6 Lithographers first began to operate at the
 7 622/630 Jackson Street location, what type of flooring
 8 was in that building? Cement floor?
 9 A. I think cement, if you want me to guess. But
 10 I'm guessing. I would say I think it's cement.
 11 Q. Why do you think it was cement?
 12 A. Cement is typically what I see in print shops,
 13 and it gives a solid bed to put equipment on. When
 14 you've got heavy duty equipment that's rocking and
 15 rolling, you need a pretty solid foundation.
 16 Q. Let me ask you: Was any of the equipment that
 17 Solano Printers & Lithographers utilized in their
 18 operations at the 622/630 Jackson Street location, was
 19 any of that equipment bolted to the floor?
 20 A. No.
 21 Q. Okay. Was there a bathroom within the building
 22 that Solano Printers & Lithographers occupied?
 23 A. I'm sure there was, but I don't remember it.
 24 Q. Do you remember if there was more than one?
 25 A. I doubt it.

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1 Q. Was it the case that Solano Printers &
 2 Lithographers employed janitorial services to keep up
 3 with the housekeeping duties at the 622/630 Jackson
 4 Street location, or is it the case that those duties
 5 would be taken care of by an employee?
 6 A. It's just such a small building, probably the
 7 employee took care of it.
 8 Q. Okay. And do you recall within the building in
 9 which Solano Printers & Lithographers operated at the
 10 622/630 Jackson Street, whether there was a floor drain
 11 in that building?
 12 A. I have no idea.
 13 Q. Okay. And you indicated, I believe, before
 14 that there was no prepress room?
 15 A. No.
 16 Q. And do you know where the locations of the
 17 dumpsters were at the time that Solano Printers &
 18 Lithographers operated at the 622/630 Jackson Street?
 19 A. No.
 20 Q. Okay. You don't recall them being in the back?
 21 A. No.
 22 Q. Do you recall them being in the front?
 23 A. No. I don't think they'd be in the front.
 24 They'd be on the sidewalk.
 25 Q. That's what I thought, too.

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1 Do you know who took away the trash for Solano
 2 Printers & Lithographers when they were operating at the
 3 622/630 location?
 4 A. I assume the Fairfield or Solano County garbage
 5 people:
 6 Q. Let me ask you: To your knowledge, was any
 7 private vendor ever hired by Solano Printers &
 8 Lithographers, or any other party or person, to dispose
 9 of any waste from the operations of Solano Printers &
 10 Lithographers at the 622/630 Jackson Street location?
 11 A. I really don't know, but I doubt it.
 12 Q. Why do you doubt it?
 13 A. That was a time -- I mean, we didn't have much
 14 waste. You didn't have a lot of paper waste. You had a
 15 few cans. You just give it to the garbage people.
 16 Q. Any other type of waste you can think of?
 17 A. No.
 18 Q. Ink waste?
 19 A. Well, I mentioned ink stays in the can, and at
 20 that point in time we didn't have the concerns with the
 21 environment, so people just threw the can with the waste
 22 into the garbage.
 23 Q. Okay. What about solvent waste, do you know
 24 how that was dealt with?
 25 A. I mentioned the rags, and those rags were

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1 cleaned up, and at some point they were recycled. We
 2 had professional cleaners come and take them back.
 3 And, frankly, I think that may have been going
 4 on when I first came into the industry in '61.
 5 Q. Do you recall any names of any vendors or
 6 recyclers that were utilized by Solano Printers &
 7 Lithographers during their operations at 622/630 Jackson
 8 Street for the purposes of recycling rags?
 9 A. No.
 10 Q. Okay. Do you know of any dry cleaners as to
 11 where those -- strike that.
 12 Are you aware of any dry cleaners that were
 13 utilized for purposes of dry cleaning those rags for
 14 Solano Printers & Lithographers when they were operating
 15 at the 622/630 Jackson Street location?
 16 A. No. We wouldn't have sent the rags to a dry
 17 cleaning place. It would have been too expensive.
 18 Q. All right. You said at some point in time that
 19 there was a vendor that would take away these rags and
 20 recycle them; is that correct?
 21 A. Yes.
 22 Q. Okay. Was that always the case during the time
 23 that Solano Printers & Lithographers operated at the
 24 622/630 location?
 25 A. I mentioned I believe they were doing that when

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1 I came to work in '61, which would be before the period
 2 we're talking about.
 3 So by that time I think it would be pretty
 4 established that you'd rotate your rags, and
 5 professional cleaners would come get them and take care
 6 of them.
 7 Q. Okay. Setting that aside, do you have any
 8 other basis for your opinion that Solano Printers &
 9 Lithographers utilized a recycling company for the use
 10 of their rags during the operations at 622/630 Jackson
 11 Street?
 12 A. Setting aside my assumption, I have none.
 13 Q. Okay. Do you have any knowledge with respect
 14 to the steps, the processes that were taken to clean the
 15 hand press during the time that Solano Printers &
 16 Lithographers operated at the 622/630 Jackson Street
 17 location?
 18 A. Hand press --
 19 Q. Yes.
 20 A. -- strictly?
 21 You scoop out the ink, put it into the can,
 22 that's the can they came in. You'd try to save it
 23 because you could use it again for a little bit if it
 24 wasn't skimmed over at the top.
 25 And then you would take a chemical of some

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1 kind, a clear liquid. If I remember, it was kind of
 2 alcohol-based, had kind of a strong odor.
 3 And you'd take a rag, and you would wash the
 4 roller train that carried all the ink onto the platen,
 5 which is where the paper goes that gets the impression
 6 put on it.
 7 And you'd clean up the platen, again, with the
 8 same rag and the same solution. And, you know, you'd
 9 take as long as it took to make sure it was clean and
 10 everything looked fine, and then you're done.
 11 Q. And then was there any residue liquid left
 12 after you were done cleaning that hand press?
 13 A. The liquid -- you know, I'm sure buckets of
 14 liquid would go into the rag and be absorbed. It wasn't
 15 that heavy of a liquid or that much of the liquid.
 16 So, no, that would probably be absorbed.
 17 Q. Do you have any method in place -- strike that.
 18 Did Solano Printers & Lithographers have any
 19 method in place during their operations at
 20 622/630 Jackson Street to ring out the rags for purposes
 21 of recycling?
 22 A. No.
 23 Q. Okay.
 24 A. It would be messy. I mean, they -- that -- you
 25 just wouldn't do that.

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1 Q. You've never heard of that process?
 2 A. No. Taking a ringer -- he's talking about the
 3 old-fashioned ringer like you used to have in the
 4 washing machines, like my grandmother had. That would
 5 just smash all the materials down into the rag. That
 6 wouldn't clean it up.
 7 Q. In order to get the solvent out to recycle the
 8 solvent, have you ever heard of that -- some sort of
 9 process where you ring out the rags, sometimes they had
 10 machines, sometimes they had operators that did that?
 11 A. I never heard of that.
 12 Q. You've never heard of that?
 13 During the operations of Solano Printers &
 14 Lithographers at the 622/630 Jackson Street, did they
 15 ever recycle ink at that location?
 16 A. No.
 17 Q. Okay. With respect to the automatic feed press
 18 that was located at the 622/630 Jackson Street during
 19 the Solano Printers & Lithographers' operations, could
 20 you explain to me the processes involved in cleaning
 21 that press?
 22 A. Really would be the same. You scoop the ink
 23 out, put it in a can, take material or solvent, and
 24 clean up the rollers.
 25 There's no platen in the case. There's a

108

1 flatbed that the -- that the form sits in that you're
 2 going to be printing, and so it just sits on that, and
 3 you've got ink applied.
 4 So all you really have is the ink train that's
 5 putting the ink down in place, and you've got to clean
 6 all those rollers up with the rag.
 7 Q. Okay. Do you also have to scrape the ink off
 8 of the press?
 9 A. Well, in the ink fountain you'd be scraping
 10 because you want to get all the residue out, but you
 11 don't scrape the rollers because the rollers are a
 12 rubber based material, and you'd destroy them. So you
 13 just use the rag on the rollers.
 14 Q. And how would you change the ink in that ink
 15 fountain? Are you familiar with --
 16 A. Well, you take it out with the scraper that I'm
 17 talking about and put another ink in, again, using a
 18 scraper, and you just manually put it in.
 19 Q. And with respect to the hand press that was
 20 utilized by Solano Printers & Lithographers in their
 21 operations at 622/630 Jackson Street, would you also --
 22 was there any reason that you would clean any of the
 23 plates on that machine?
 24 A. There were no plates on those machines.
 25 Q. That's what I wanted to find out.

109

1 What about with respect to the automatic feed
 2 press?
 3 A. No plates.
 4 Q. Okay.
 5 A. Plates only have to do with offset and
 6 lithography.
 7 Q. Okay. Thank you.
 8 Do you know what methods were utilized by
 9 Solano Printers & Lithographers during their operations
 10 at 622/630 Jackson Street in order to remove ink from
 11 the floor?
 12 A. Well, as I mentioned before, you don't really
 13 get ink on the floor. If you do, you're doing something
 14 wrong. I guess you'd take a scraper, but you're not
 15 going to have ink thrown all over the place.
 16 Q. Okay. And I --
 17 A. I've never seen a printing company with ink on
 18 the floor unless it's so miserably awful that it's -- I
 19 just don't do business with people like that.
 20 Q. Sure. Let me ask you: You've never heard of
 21 operations, cleaning operations whereby people would
 22 have to remove ink from the floor that either was from a
 23 messy operation, from a spill, from somebody knocking
 24 over anything that resulted in ink on the floor? You
 25 never heard of --

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1 A. No. If you knock over a can, the ink isn't so
 2 viscous that it flows. It's just going to stay in the
 3 can and it's going to not go anywhere.
 4 And the stuff doesn't fly out of the press. If
 5 it's flying out of the press, you're going to have just
 6 crappy printing.
 7 Q. Now, the ink that you described, would that be
 8 true also with ink that was used for newspaper printing?
 9 A. Yeah.
 10 Q. Would that also be true for ink that was used
 11 on coated substrate?
 12 A. Yes.
 13 Q. It would be that viscous?
 14 A. That it would stay. It doesn't move around a
 15 lot. If you get into flexo printing, you have a very
 16 liquidy type of material, but that's not used in letter
 17 press or in litho. F-l-e-x-o, flexography.
 18 Q. So, to your knowledge, as you sit here today,
 19 there -- you can't recall of an instance where any ink
 20 was spilled on the floor during the operations of Solano
 21 Printers & Lithographers at the 622/630 Jackson Street
 22 location?
 23 A. No.
 24 Q. Is that something you would have been informed
 25 of in your capacity with Solano Printers &

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1 Lithographers?
 2 A. No one would want to tell me if they were
 3 stupid enough to get ink on the floor because I think
 4 that's a bad practice.
 5 There would be ink occasionally on a press, but
 6 that's more of the operator being a little sloppy when
 7 he's putting ink up into the fountain.
 8 Q. Sure. And for --
 9 A. But no one's going to come and tell an owner
 10 that they've got ink all over the place.
 11 Q. Right. So do you know what methods were
 12 employed by anyone, Mr. Whalley or anyone else, at
 13 Solano Printers & Lithographers during their operations
 14 at 622/630 Jackson Street to remove ink from either the
 15 hand press or the automatic feed press? Do you know how
 16 they do that?
 17 A. Well, didn't I just explain how it's done?
 18 Q. No, I don't think so.
 19 A. Well, you asked me how you clean them up. That
 20 would be exactly the same way in which Mr. Whalley would
 21 have cleaned up the press.
 22 Q. Okay. So the operations that you --
 23 A. I described a knife into the fountain, get rid
 24 of the ink, solution onto the rollers to clean up the
 25 rollers, and in the case of a hand press, clean up the

112

1 platen.
 2 Q. Okay. Mr. Keilholtz, you're going to have to
 3 let me finish my question. You're going to drive this
 4 lady insane.
 5 A. I'm sorry. I'll apologize to you more than to
 6 him. You're the hard-working person here.
 7 Q. Now, setting aside the cleaning processes that
 8 we described for the presses, would you ever -- was
 9 there ever an occasion where they would clean the
 10 exterior of the press?
 11 A. Yeah.
 12 Q. Okay. And how was that done during the
 13 operations of Solano Printers & Lithographers during the
 14 time that they operated at 622/630 Jackson Street?
 15 A. With a rag and some solution on that, or
 16 solvent (indicating).
 17 Q. Okay.
 18 A. And I'm going through the motion. You can't
 19 see that on the record.
 20 Q. During the time that Solano Printers &
 21 Lithographers operated at 622/630 Jackson Street where
 22 were cleaning rags located?
 23 A. I have no idea.
 24 Q. Okay. Where were solvents stored?
 25 A. Well, it would have been in containers, but I

113

1 don't know -- on shelves.
 2 Q. Okay. And how big of containers were they in?
 3 A. Well, you know, small gallon size or -- the
 4 biggest, or maybe pint size, depending on the material.
 5 Q. And approximately where in the building were
 6 those gallon or pint size --
 7 A. Containers?
 8 Q. -- containers of solvent stored?
 9 A. I have no idea.
 10 Q. Okay. Do you know where any mops or cleaning
 11 materials were stored at 622/630 Jackson Street location
 12 during the time that Solano Printers & Lithographers
 13 operated at that location?
 14 A. Absolutely not.
 15 Q. And do you have any information with respect to
 16 any of the types of blanket washes, solvents, cleaners
 17 that were used at 622/630 Jackson Street during the time
 18 that Solano Printers & Lithographers operated there?
 19 A. No.
 20 Q. Do you know whether any product called Type
 21 Wash was ever used at the 622/630 Jackson Street
 22 location during the time that Solano Printers &
 23 Lithographers operated there?
 24 A. Type Wash was part of the entire letter press,
 25 hot metal process.

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1 Q. Okay. And I'm not sure that -- and that was
 2 utilized during -- by Solano Printers & Lithographers at
 3 the 622/630 Jackson Street?
 4 A. It would have been.
 5 Q. Okay. And do you know if Solano Printers &
 6 Lithographers during the operations at the
 7 622/630 Jackson Street location used any Safety-Kleen
 8 parts washers?
 9 A. I don't know.
 10 Q. Are you familiar with a product called
 11 Safety-Kleen parts washer 105?
 12 A. No, I'm not familiar with that.
 13 Q. Are you familiar with any Safety-Kleen parts
 14 washers?
 15 A. I'm vaguely aware that Safety-Kleens exist.
 16 Q. How so?
 17 A. What do you mean "how so"?
 18 Q. How are you aware of it?
 19 A. I've seen them in different plants, I think.
 20 Q. Okay. Have you ever used any of those
 21 products?
 22 A. Perhaps my employees have, but I haven't.
 23 Q. Have you ever -- strike that.
 24 Do you know -- did you ever have any
 25 conversations with Mr. Whalley, with respect to his

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1 operations for Solano Printers & Lithographers at the
 2 622/630 Jackson Street, did you ever have any
 3 conversations with him with respect to how he would
 4 remove ink, say from his clothes, that he inadvertently
 5 got on him during the printing processes?
 6 A. No.
 7 Q. Okay. Let me ask you: During the time that
 8 Solano Printers & Lithographers operated at the
 9 622/630 Jackson Street location, could you smoke in that
 10 place?
 11 A. Yeah.
 12 Q. Okay.
 13 A. In that day and age.
 14 Q. Right.
 15 A. I hope we can't be crucified for that.
 16 Everyone smoked then.
 17 Q. I smoke myself, sir. And I'm not -- that's not
 18 what I'm trying to get at. What I'm trying to get at is
 19 if Mr. Whalley wanted to light up a cigarette while he
 20 was --
 21 A. We --
 22 Q. Please let me finish.
 23 If Mr. Whalley wanted to light up a cigarette
 24 while he was working at the 622/630 Jackson Street
 25 location, he could?

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1 A. Absolutely. We followed the standard practice
 2 of the time.
 3 Q. No safety concerns with respect to any of the
 4 chemicals, with respect to any cigarettes --
 5 A. None.
 6 Q. -- in the building?
 7 Do you have any knowledge as to how often
 8 chemicals were delivered to the 622/630 Jackson Street
 9 location during the time that Solano Printers &
 10 Lithographers operated at that location?
 11 A. No.
 12 Q. To the best of your knowledge, who would know
 13 that?
 14 A. Nobody that's alive. Whalley if he were alive.
 15 Q. Do you know of any of the suppliers that
 16 supplied any chemicals to Solano Printers &
 17 Lithographers during their operations at the
 18 622/630 Jackson Street location?
 19 A. I don't know.
 20 Q. Do you know if Van Waters & Rogers ever
 21 supplied any chemicals to Solano Printers &
 22 Lithographers during the time they operated at the
 23 622/630 Jackson Street?
 24 A. They're kind of a high priced product. I don't
 25 think they would have used that but --

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1 Q. Same question with respect to Goss-Jewett?
 2 A. Goss?
 3 Q. Jewett?
 4 A. Jewett? That's web stuff, I think. I don't --
 5 we never used that.
 6 Q. And did Mr. Whalley, was it his responsibility
 7 to order those products?
 8 A. Yes.
 9 Q. Okay. Anyone else's?
 10 A. No.
 11 Q. Did he report to anyone with respect to
 12 invoices of those products or types of products he
 13 should -- well, strike that. Let me break them up.
 14 Did Mr. Whalley ever report to anyone to your
 15 knowledge with respect to invoices for chemicals that
 16 were used during Solano Printers & Lithographers'
 17 operations at 622 Jackson?
 18 A. The bills were paid by Cal Central Press, so
 19 any bill or invoice that looked unreasonable would be
 20 questioned by our Accounting Department.
 21 Q. Did you have any involvement in that --
 22 A. No.
 23 Q. -- questioning invoices?
 24 A. No, but I knew what was going on. We had
 25 limits as to how much somebody could buy, but that was

30 (Pages 114 to 117)

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1 just a small business. It never reached the limits.
 2 Q. Do you have any knowledge as to how any
 3 solvents or cleaning products were delivered to Solano
 4 Lithographers during their operations at the
 5 622/630 Jackson Street property?
 6 A. By truck.
 7 Q. Okay. How do you know that?
 8 A. How else were they going to deliver it?
 9 Q. I don't know. That's why I'm asking you, sir.
 10 A. Well, I'm telling you, by truck.
 11 Q. Okay. And I'm asking you, how do you know
 12 that?
 13 A. Because there's no other way unless we -- the
 14 guy picked it up in his car.
 15 Q. That would be one way.
 16 A. And Whalley wouldn't have done that.
 17 Q. Okay. Why not?
 18 A. Because the suppliers, in the first place,
 19 would have either been in the Bay Area or here in
 20 Sacramento. So he would have had to have driven to pick
 21 them up and put them in his car.
 22 Q. And what suppliers are you referring to, within
 23 the Bay Area and Sacramento, that would supply products
 24 for use by Solano Printers & Lithographers during their
 25 operations at 622/630 Jackson Street?

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1 A. Well, one of them was Cal Ink. There's a
 2 couple -- there's so many of them that have come and
 3 gone, and I can't remember any others than Cal Ink right
 4 now.
 5 Q. And that was located in the Bay Area or in
 6 Sacramento?
 7 A. Yeah, Bay Area. He had quarters in Berkeley.
 8 Q. Any other ones you recall in the Bay Area?
 9 A. No. I have to think about it. Smart Supply.
 10 They had a branch here. I don't know where their
 11 headquarters were.
 12 Q. Any others?
 13 A. No.
 14 Q. I'm sorry?
 15 A. No, I'd have to stop and think, and it would
 16 probably be -- I'd probably be able to recall after a
 17 while, but I'd have to give that some thought.
 18 Q. And if by the end of the day or by the end of
 19 our time together, if you recall any, if you'd give me
 20 that information, I'd appreciate it.
 21 A. Okay.
 22 Q. Do you recall any in Sacramento?
 23 A. Well, Cal Ink and the other one I mentioned
 24 both had branches here.
 25 Q. The Smart Supply?

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1 A. Smart Supply.
 2 Q. Thank you.
 3 When this truck would come up to deliver
 4 chemicals for use by Solano Printers & Lithographers
 5 during their operations at the 622/630 Jackson Street
 6 property, did they drive up into the back, or did they
 7 drive up to the front, do you know?
 8 A. I have no idea.
 9 Q. Were any chemicals or supplies ever delivered
 10 to Solano Printers & Lithographers during their
 11 operations at 622/630 Jackson Street, were they ever
 12 delivered in 55-gallon drums?
 13 A. Boy, that would be a lot for them. I really
 14 doubt it, but I don't know.
 15 Q. Okay. You have no knowledge one way or the
 16 other?
 17 A. I have no direct knowledge.
 18 Q. We talked about rags that were utilized by
 19 Solano Printers & Lithographers in their operations of
 20 cleaning the presses at the 622/630 Jackson Street.
 21 Are you familiar with any other types of wipes
 22 that they would use at that location?
 23 A. There are wipes that I've seen in the industry,
 24 but they're for -- but they're not as good a cleanup
 25 method, and so we've never used them in any of our

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1 operations.
 2 Q. Okay. Let me ask you: To your knowledge, the
 3 two presses that we've been talking about utilized by
 4 Solano Printers & Lithographers during their operations
 5 at the 622/630 Jackson Street property, did you only
 6 need one solvent to clean both of those presses, or did
 7 both of those presses -- sorry -- or did each of those
 8 presses require a different type of solvent for
 9 cleaning?
 10 A. I'm not sure. My speculation is it's the same.
 11 I mean, the process is the same. I can't imagine why
 12 we'd use different from my knowledge of the industry.
 13 But I really don't know what we did there.
 14 Q. Okay. Do you have any knowledge,
 15 Mr. Keilholtz, with respect to how ink was delivered to
 16 Solano Printers & Lithographers during their operations
 17 at 622/630 Jackson Street?
 18 A. By the same vendors as I mentioned before, and
 19 by truck.
 20 Q. Okay. And that would be Cal Ink and Smart
 21 Supply?
 22 A. Right.
 23 Q. Okay. And --
 24 A. And who else, I can't -- I mean, you know, I've
 25 dealt with dozens of these companies, and many of them

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1 have gone out of business.
 2 Q. I understand.
 3 And the ink, that would be delivered, what, in
 4 55-gallon drums?
 5 A. No, no. Again, that would be an awful lot of
 6 ink. They probably got small containers of five to 10
 7 pounds.
 8 Q. And do you know -- and forgive me if I asked
 9 you this -- do you know where that was stored --
 10 A. I have no idea.
 11 Q. One second.
 12 Do you know where that was stored during Solano
 13 Printers & Lithographers' operations at the
 14 622/630 Jackson?
 15 A. No.
 16 Q. Okay. During Solano Printers & Lithographers'
 17 operations at the 622/630 Jackson, were you ever made
 18 aware of any solvent spills?
 19 A. No.
 20 Q. Were -- same question with respect to ink
 21 spills?
 22 A. No.
 23 Q. Okay. Have you ever heard the phrase "dipping
 24 ink out of a fountain"?
 25 A. Well, I haven't really heard it since you said

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1 it, but I know exactly what it is.
 2 Q. What is it?
 3 A. Well, it's taking that spatula, whatever, that
 4 metal knife, and pulling it out, and that's part of the
 5 cleanup process, or maybe getting ready for another
 6 color to go in there.
 7 Q. Okay.
 8 A. But that's what I would interpret the comment.
 9 Q. And do you know if -- or strike that.
 10 When -- in the operations of Solano Printers &
 11 Lithographers at the 622/630 Jackson Street, when they
 12 dipped out the ink fountains, do you know how they
 13 disposed of that?
 14 A. That's what I mentioned, that you put into the
 15 old ink can, and if it's still usable and hasn't gotten
 16 too scummy, you might reuse it or you take the can and
 17 put it in the garbage.
 18 Q. Okay. That's what I -- thank you.
 19 Do you have any idea, Mr. Keilholtz, as to how
 20 much ink was used by Solano Printers & Lithographers
 21 during their operations at the 622/630 Jackson Street
 22 property?
 23 A. Well, I don't know if it would help, a revenue
 24 figure, but the ink runs in our industry a couple of
 25 percent of total revenues. And at the most, that

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1 company did a 150 to 200,000 at its peak when it was
 2 down on Texas Street.
 3 So that would have been two to \$4,000 worth of
 4 ink a year. That's a pretty minimal amount.
 5 Q. Same question with respect to solvents?
 6 A. I'm not as aware of the solvent cost as I am --
 7 it gets buried and not reported in our ratio studies,
 8 nor in our financial statements. But I would say it's
 9 probably like a half of a percent.
 10 Q. Do you know if during their operations at
 11 622/630 Jackson Street whether Solano Printers &
 12 Lithographers ever did any film developing at that
 13 location?
 14 A. We don't think so. I don't -- remember, I said
 15 there's no prepress, and you can't do film developing
 16 unless you did prepress.
 17 Q. Right. I wanted to clarify that with you.
 18 A. And so it depends a little bit when we got into
 19 this check business. But I think that was after, again,
 20 after we moved.
 21 Q. How would it depend on when you got into the
 22 check business?
 23 A. Because we used a different process. We
 24 started to use a Multilith to print the checks, to
 25 encode the checks. We printed the masters in

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1 Sacramento, the master form, and then would cut it down
 2 and send it down there, and would imprint for people
 3 like Wells Fargo, though as I remember, our major
 4 customer was really the Bank of California.
 5 I guess we did, we did Wells Fargo, we did one
 6 or two branches in Sacramento, and that's all. But we
 7 got a substantial block of business from the Bank of
 8 California, and that's one of the reasons we moved
 9 because we were anticipating getting that business.
 10 And I remember that, again, because that was
 11 the business we were trying to break into, so it was a
 12 major thrust.
 13 Q. The checking coding process or what -- is that
 14 what that is?
 15 A. Yeah, because that's when you first started to
 16 have the little number down there at the bottom.
 17 Q. Right.
 18 A. And it would be, you had to use a magnetic ink,
 19 a special ink, and that way it could be read when it
 20 went through the teller's -- the bank's machines.
 21 And that started at about the period in time
 22 when we moved. That was just getting going in the '60s
 23 to '70s, and it became a standard. Of course, it became
 24 more sophisticated now.
 25 But you got the code number always, and that

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1 started at that period of time, and we were fairly early
 2 on in introducing that.
 3 Q. So as you sit here today, you don't have
 4 knowledge one way or the other whether Solano Printers &
 5 Lithographers conducted those types of operations at the
 6 622/630 Jackson Street property?
 7 A. I do not know for sure. I don't believe we
 8 did, but I have no way of verifying that.
 9 Q. Now, these mag- -- strike that.
 10 This encoding process for the bank checks that
 11 we've just been discussing, was it necessary to utilize
 12 a different printing press for those types of
 13 operations?
 14 A. We did it on like a Multilith that I learned to
 15 print on. A little small duplicator.
 16 Q. Okay. So if, in fact, those check encoding
 17 processes -- just assume for a second that they were
 18 occurring at the 622/630 Jackson Street property during
 19 Solano Printers & Lithographers' operations over there.
 20 They would have had to have an additional
 21 machine to conduct those processes; is that correct?
 22 A. Correct.
 23 Q. Okay. Other than the hand press and the
 24 automatic feed --
 25 A. Right.

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1 Q. -- that you previously described?
 2 A. Yes.
 3 MR. NICKOVICH: Objection, assumes facts not in
 4 evidence.
 5 BY MR. GRAHAM:
 6 Q. Are you familiar with a company called
 7 Fairfield Printing Company?
 8 A. No.
 9 Q. "No"?
 10 What about Fairfield Printers?
 11 A. I have vague recollection of a Fairfield
 12 Printers & Lithographers, which I think we talked about
 13 when I was on the phone with you. And I was confused
 14 about the names of the two companies, Solano and
 15 Fairfield.
 16 Q. Now, to your knowledge, did Fairfield Printers
 17 & Lithographers, did they operate within Fairfield?
 18 A. I don't know.
 19 Q. Have you ever had any affiliation whatsoever
 20 with Fairfield Printers & Lithographers?
 21 A. I don't believe so.
 22 Q. Do you know if Cal Central Press ever had any
 23 affiliation whatsoever with Fairfield Printers &
 24 Lithographers?
 25 A. I don't believe so. We sold Fairfield Printers

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1 & Lithographers -- Solano Printers & Lithographers, we
 2 sold it to Safeguard, which was a major corporation at
 3 the time, and at that time we got out of and closed the
 4 business.
 5 Q. And approximately what year was that?
 6 A. Sometime in the early '70s or late '60s, '68,
 7 to '71, '2.
 8 Q. So you're not -- let me ask you: Are you
 9 familiar with any other printing company that operated
 10 at this 622/630 Jackson location subsequent to the
 11 operations of Solano Printers & Lithographers?
 12 A. No, I'm not.
 13 Q. Okay. All right. When you all moved out of
 14 the 622/630 Jackson Street location, when Solano
 15 Printers & Lithographers moved out of there, where did
 16 those machines go?
 17 A. They would have moved to the new location.
 18 Q. At the Texas Street location?
 19 A. Yeah.
 20 Q. Okay. Do you specifically recall all of the
 21 machines moving to that location?
 22 A. I have no idea what we moved.
 23 Q. You couldn't sit here --
 24 A. I couldn't sit here and tell you.
 25 Q. Were you involved in any way in moving any of

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1 the machines or supplies?
 2 A. No.
 3 Q. Do you know who was?
 4 A. No.
 5 Q. You don't have any names?
 6 A. No.
 7 Q. Inside the building at the 622/630 Jackson
 8 Street location, during the time that Solano Printers &
 9 Lithographers operated there, are you familiar with any
 10 cracks in the cement floors there?
 11 A. No.
 12 Q. Okay. Nothing stands out?
 13 A. Well, back up. I've never seen a cement floor
 14 that doesn't have a crack.
 15 Q. That's a better answer.
 16 Do you recall any specific places within the
 17 building that had cracks within the cement?
 18 A. No.
 19 Q. Okay. You recall that ever being a problem
 20 between Solano Printers & Lithographers and the
 21 landlord?
 22 A. No.
 23 MR. NICKOVICH: Objection, assumes facts not in
 24 evidence.
 25 MR. GRAHAM: I think our court reporter needs

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1 to take a break. Let's take a break for about 10
 2 minutes. I have -- let's go off the record.
 3 (Recess taken.)
 4 BY MR. GRAHAM:
 5 Q. All right. We're back on.
 6 Mr. Keilholtz, you understand you're still
 7 under oath?
 8 A. I understand.
 9 Q. Okay. Let me ask you: During the operations
 10 of Solano Printers & Lithographers at the
 11 622/630 Jackson location, do you recall if there was
 12 ever a machinist employed to take care of those presses?
 13 A. No.
 14 Q. You don't recall or there was not one?
 15 A. Well, I don't recall, but a business that size
 16 would be crazy to hire a machinist.
 17 Q. Is it your belief that Mr. Whalley had the
 18 capability to perform the duties of a machinist with
 19 respect to the presses that were located at the
 20 622/630 Jackson Street location?
 21 A. That equipment -- the traditional equipment
 22 seldom broke down, and we did have a guy on staff at Cal
 23 Central that could have been available had we needed him
 24 to go to Fairfield.
 25 Q. Let me ask you, Mr. Keilholtz: Are you aware

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1 as you sit here today whether or not there were ever any
 2 dry cleaning operations that took place at the
 3 622/630 Jackson Street property?
 4 A. Certainly not aware of any there, no.
 5 Q. And I mean within any time period?
 6 A. Within any time period. There would be no
 7 reason for me to know that.
 8 Q. Do you have any knowledge with respect to a
 9 business called Gillespie Cleaners?
 10 A. No.
 11 Q. Did you ever know a Mr. Bernard Gillespie?
 12 A. No.
 13 Q. Did you ever know Marcie Gillespie?
 14 A. No.
 15 Q. Macie Gillespie?
 16 A. No.
 17 Q. Do you know a man by the name of Russell
 18 Hoover?
 19 A. No.
 20 Q. Were you ever made aware of the fact that at
 21 some point in time there was an older building that was
 22 located behind the main building at the 622/630 Jackson
 23 Street location?
 24 MR. NICKOVICH: Objection, assumes facts not in
 25 evidence.

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1 THE WITNESS: I don't remember what was back
 2 there.
 3 BY MR. GRAHAM:
 4 Q. Had you ever heard of an old building being
 5 torn down that was back behind the 622/630 Jackson
 6 Street property?
 7 A. Never heard of it.
 8 Q. Okay. Had you ever heard of a boiler explosion
 9 that took place over at the old Gillespie Cleaners that
 10 was located at the 622 through 630 Jackson Street
 11 location?
 12 A. Never.
 13 Q. Okay. It was big news in Fairfield. That's
 14 why I just --
 15 MR. NICKOVICH: I need to object. That assumes
 16 facts not in evidence.
 17 BY MR. GRAHAM:
 18 Q. Let me ask you, Mr. Keilholtz: Did you live in
 19 Fairfield at any point in time?
 20 A. No.
 21 Q. Okay. Did you ever subscribe to any Fairfield
 22 newspapers?
 23 A. No.
 24 Q. Do you know a Mr. Gerald Duensing?
 25 A. Joe Duensing? No.

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1 Q. Gerald.
 2 A. Gerald Duensing?
 3 Q. Duensing.
 4 A. No.
 5 Q. Gerry Duensing?
 6 A. No.
 7 Q. Tom Turigliatto?
 8 A. No.
 9 Q. Do you know a man by the name of Ed Peabody?
 10 A. Yes.
 11 Q. And who is Ed Peabody?
 12 A. He was the fellow that I mentioned earlier that
 13 when we bought the building that the printing company
 14 moved to, he was a partner with Dave and I.
 15 Q. The printing -- the building that the printing
 16 company moved to, you're referring to --
 17 A. At Texas.
 18 Q. Okay. Thank you.
 19 MR. GRAHAM: With that, Mr. Keilholtz, I'm
 20 going to pass the baton. I might have some more
 21 follow-up questions based upon what other attorneys ask
 22 you; I may not.
 23 I'll review my notes, see what I have. If I
 24 have anything, it'll be minimal. And thank you for
 25 showing up today. I appreciate it.

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1 THE WITNESS: Sure.
 2 MR. PRICE: No questions at this time.
 3 MS. McADAM: You want to go next or me?
 4 MR. NICKOVICH: No, go ahead.
 5 MS. McADAM: Okay.
 6 EXAMINATION
 7 BY MS. McADAM:
 8 Q. Hi, Mr. Keilholtz. I'm Allison McAdam, and I
 9 represent Jewel Hirsch in this matter. I just have a
 10 couple of questions for you. Several are follow-up, and
 11 several might be new subject matter.
 12 I just wanted to find out, first: Do you have
 13 any personal knowledge of any dry cleaning operations in
 14 downtown Fairfield?
 15 A. No.
 16 Q. Would Cal Central have maintained insurance
 17 policies that may have covered the operations of Solano
 18 Printing & lithography?
 19 A. Yes, we would have had insurance.
 20 Q. During the time it operated at the 622 --
 21 A. Right.
 22 Q. -- 630 property, Jackson Street property?
 23 A. We always insured everything.
 24 Q. Where would those policies have been
 25 maintained?

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1 A. Well, probably a copy with the insurer, the
 2 insurance company, and probably we had copies in the
 3 main plant.
 4 Q. Is there someone who may still have those
 5 copies?
 6 A. No. You're talking 45 years ago.
 7 Q. I understand. Sometimes insurance policies
 8 have a way of showing up years later, so I'm just
 9 wondering if there's anywhere that those policies may
 10 still be stored.
 11 A. I'm sure that in the transition that I
 12 mentioned earlier, all materials relevant to the history
 13 of the company got taken -- dumped.
 14 And the people that probably carried the
 15 insurance, they're out of business, so I doubt they have
 16 the records.
 17 Q. That was going to be my next question.
 18 Is there an employee from Cal Central that
 19 would know which insurers those policies may have been
 20 placed with? Or do you recall which insurers?
 21 A. No, it would have been -- can't think of her
 22 first name -- Abrew was the person that was
 23 responsible -- Abrew, A-b-r-e-w, can't think of the
 24 first name, it'll come back to me, and she's dead.
 25 Q. Abrew was an employee of Cal Central?

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1 A. Yeah, she was our office manager. And she
 2 would have seen records and kept records, and she kept
 3 everything in a pile some place. She was always one of
 4 those miracle workers that would go, "Here it is."
 5 Q. Did Abrew have an assistant or a subordinate?
 6 A. We had a staff, so she was the one in charge of
 7 the staff of about three people.
 8 Q. Do you recall any of the other staff names?
 9 A. No. Dorothy Adams, and she's dead.
 10 Q. Anyone else?
 11 A. (Witness shook head.)
 12 Q. And none of the insurance companies' names jump
 13 to mind as someone that you routinely placed insurance
 14 with at Cal Central?
 15 A. Sacramento Valley Insurance Company I believe
 16 was the company, and that's what I was trying to think.
 17 And we knew the two principals, and I can't think of
 18 their name, but they did the insurance stuff.
 19 Q. And you think that would have been during the
 20 time period we've been discussing, the mid 1960s when
 21 Solano --
 22 A. Yeah, I suspect --
 23 Q. -- Solano Printing & Lithography was in
 24 operation at the 622/630 Jackson Street property?
 25 A. Right. That would -- I'm sure would be the

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1 people that would have had the insurance.
 2 Q. And I may have missed your response --
 3 A. Pauline Abrew, by the way, was the name of the
 4 woman that was my office manager.
 5 Q. I'm sorry?
 6 A. Pauline Abrew.
 7 Q. Pauline? And you understand she's deceased?
 8 A. Well, you know, she might still be alive
 9 somewhere, but she's pretty old if she is.
 10 Q. Do you recall where Ms. Abrew resided?
 11 A. The last place she was living was in
 12 La Riviera, there's some condos that she lived in. But
 13 I haven't seen her for probably 15 or 20 years.
 14 Q. Is that in Sacramento?
 15 A. That's in Sacramento, excuse me, yes, yes.
 16 La Riviera is in Sacramento. That's where she lived.
 17 Q. And I may have missed your response, but who
 18 owned the 622/630 Jackson Street property at the time
 19 that you were operating --
 20 A. Yeah, I don't know --
 21 Q. -- the business there?
 22 You don't recall?
 23 A. I don't recall.
 24 Q. Do you recall if Mr. Whalley had any family
 25 members, relatives work with him at the printing shop on

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1 622/630 Jackson Street?
 2 A. No, but we kind of talked about that. I have a
 3 vague recollection that after we sold the company to
 4 Safeguard, that Whalley and his son got involved in a
 5 print shop that might have been that Fairfield thing
 6 that came up earlier.
 7 Q. Does the name Robert Whalley ring a bell?
 8 A. There were two Whalleys. Robert I think was
 9 the one son that might have been doing printing with
 10 him. The other son was working here in Sacramento as an
 11 electrician and had a really good job. I'm sure he
 12 never did, but I can't think of his first name.
 13 But Robert does ring a bell. They could have
 14 for a brief period of time run a printing business.
 15 Q. Do you recall Robert ever working at Solano
 16 Printing & Lithography at the time?
 17 A. No, I don't. I'm almost sure he didn't.
 18 Q. And then just to clarify, you do recall that
 19 solvents were used during the operations at
 20 622/630 Jackson Street during the time Solano Printers &
 21 Lithography operated there; is that correct?
 22 A. That's right.
 23 MR. FARRELL: Objection, that's a leading
 24 question, that assumes facts not in evidence, misstates
 25 prior testimony.

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1 BY MS. McADAM:
 2 Q. Okay. Well, let's go back.
 3 Do you recall whether solvents were used during
 4 the operations of Solano Printing & Lithography during
 5 the operations at the 622/630 Jackson Street property?
 6 A. And I'll phrase it this way. I don't really
 7 recall if they were used, but it would be impossible to
 8 run a print shop without using some.
 9 Q. Based on your understanding --
 10 A. Of the printing industry.
 11 Q. -- and your years of experience in the printing
 12 industry, it's your understanding that solvents would
 13 have been used --
 14 A. Correct.
 15 Q. -- during the operations of Solano Printing --
 16 Printers & Lithography at the 622/630 Jackson Street
 17 property?
 18 A. Correct.
 19 MS. McADAM: All right. Thank you very much,
 20 Mr. Keilholtz.
 21 MR. NICKOVICH: Bob, do you want to go, or do
 22 you want me to go?
 23 MR. FARRELL: Go ahead.
 24 - - -
 25 EXAMINATION

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1 BY MR. NICKOVICH:
 2 Q. Hi, Mr. Keilholtz. I just have a few more
 3 questions for you.
 4 We've been talking about the 622/630 property.
 5 And you recall that there was a movie theater in part of
 6 that property, correct?
 7 A. Yes.
 8 Q. Do you recall if that was considered
 9 630 Jackson Street?
 10 A. I have no idea what the address was. I just
 11 know it faced on Texas Street.
 12 Q. Okay. Thank you.
 13 Now, you recall that you believe a letter press
 14 and an automatic press were used at 622 Jackson Street,
 15 Solano Printers & Lithographers.
 16 You base that assumption, I believe, on the
 17 fact that you wouldn't have bought the print shop if it
 18 didn't have those --
 19 A. Right.
 20 Q. -- equipment, correct?
 21 Do you have firsthand knowledge that those
 22 pieces of equipment existed there?
 23 A. No.
 24 Q. Okay. Thank you.
 25 Now, I want to zero in on the amount of time

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1 that Solano Printers & Lithographers operated at
 2 622 Jackson Street.
 3 It's my understanding, based on your testimony,
 4 and please correct me if I'm wrong, that Solano Printers
 5 & Lithographers operated at 620 Jackson Street for a
 6 maximum of one and a half years; is that correct?
 7 A. That's my recollection.
 8 Q. And it could have been as little as 12 months;
 9 is that correct?
 10 A. Could have been.
 11 Q. Okay. Thank you.
 12 MR. GRAHAM: Counsel, you said "620 Jackson."
 13 MR. NICKOVICH: I meant 622. Thank you.
 14 Q. I want to talk about the size of Solano
 15 Printers & Lithographers that operated at 622 Jackson
 16 Street for one year to one and a half years.
 17 Do you know precisely how many employees
 18 operated at that facility during that time period?
 19 A. Best of my recollection, between two and three
 20 people.
 21 Q. Okay.
 22 A. Including Whalley.
 23 Q. Could it have been less?
 24 A. It could have been less.
 25 Q. Could it have been one person?

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1 A. It could have been one person.
 2 Q. Okay. So for that entire one-year to
 3 one-and-a-half-year time period that Solano Printers &
 4 Lithographers operated at 622 Jackson Street, is it
 5 possible that it was just a one-person print shop?
 6 A. It is possible.
 7 Q. Thank you.
 8 Now, I want to talk about an answer you gave to
 9 one of Mr. Graham's questions regarding the fact that
 10 Type Wash could have been used at Solano Printers &
 11 Lithographers.
 12 Do you have any firsthand knowledge that Type
 13 Wash was used at Solano Printers & Lithographers?
 14 A. No.
 15 Q. Okay. Thank you.
 16 Now, Mr. Graham asked you about the amount of
 17 ink used every year at Solano Printers & Lithographers,
 18 which operated at 622 Jackson Street, and he also asked
 19 you about the amount of solvents. I'm going to take ink
 20 first.
 21 I believe you speculated based on a calculation
 22 that ink was 1 percent to 2 percent of revenue that at
 23 its peak it could have been two to \$4,000 a year in ink;
 24 is that correct?
 25 A. Correct.

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1 Q. What's the minimum amount conceivably that
 2 could have been spent on ink at that facility during the
 3 year to year and a half that Solano Printers &
 4 Lithographers operated at 622 Jackson Street?
 5 A. \$500.
 6 Q. Thank you.
 7 And you made a similar calculation regarding
 8 the amount of money that would have been spent on
 9 solvents for Solano Printers & Lithographers' operations
 10 at the 622 Jackson Street for one to one and a half
 11 years.
 12 And if I recall, that was based on an
 13 assumption that was at least half or less of a percent
 14 of the amount spent on ink; is that correct?
 15 A. Right.
 16 Q. Okay. What is the minimum amount that could
 17 have been spent on an annual basis on solvents for
 18 Solano Printers & Lithographers at 622 Jackson Street?
 19 MR. GRAHAM: Objection, vague and ambiguous,
 20 calls for speculation.
 21 MR. NICKOVICH: Let me ask again.
 22 THE WITNESS: We -- we could have used as
 23 little as 500 in ink, we probably would have used
 24 somewhere around 50 in solvents, \$50. Would be very
 25 minimal.

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1 BY MR. NICKOVICH:
 2 Q. That's on an annual basis?
 3 A. Yes.
 4 Q. Okay. So based on your testimony that Solano
 5 Printers & Lithographers may have operated for as little
 6 as one year at 622 Jackson Street, it's possible that
 7 the grand total of dollars and cents spent on solvents
 8 for that facility was \$50?
 9 MR. GRAHAM: Objection, vague and ambiguous,
 10 misstates testimony, incomplete hypothetical, and lacks
 11 foundation.
 12 THE WITNESS: Yes, it's possible.
 13 BY MR. NICKOVICH:
 14 Q. What is the least amount of money possible that
 15 Solano Printers & Lithographers spent on solvents during
 16 the time it operated at 622 Jackson Street?
 17 MR. GRAHAM: Objection, vague and ambiguous,
 18 calls for speculation.
 19 THE WITNESS: Well, speculation, if they didn't
 20 clean things up, they could have gotten by with spending
 21 nothing.
 22 BY MR. NICKOVICH:
 23 Q. So it's possible that they didn't spend any
 24 money on solvents; is that correct?
 25 A. It's possible, on solvents.

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1 Q. Thank you.
 2 And you yourself have no personal knowledge
 3 about any of the solvents that were used at 622 Jackson
 4 Street --
 5 MR. GRAHAM: Vague and ambiguous.
 6 BY MR. NICKOVICH:
 7 Q. -- during Solano Printers & Lithographers'
 8 operations; is that correct?
 9 MR. GRAHAM: Same objection.
 10 THE WITNESS: Correct.
 11 BY MR. NICKOVICH:
 12 Q. Okay. Thank you.
 13 I'm going to shift for one second to the
 14 question about, when Solano Printers & Lithographers
 15 moved to Texas Street, do you know how long they
 16 operated at Texas Street?
 17 A. I don't really remember that. I've got a
 18 really poor recollection, but I suppose three to four
 19 years.
 20 Q. Okay. So is it fair to say at least twice as
 21 long as they operated at 622 Jackson Street?
 22 A. That's fair.
 23 Q. Okay. So it's fair to say that Solano Printers
 24 & Lithographers operated at least twice as long on Texas
 25 Street as they operated at 622 Jackson Street; is that

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1 correct?
 2 A. Yes.
 3 Q. Thank you.
 4 I just want to follow up with a few more
 5 questions, and this will probably be all I have.
 6 Again, your testimony is that you have no
 7 knowledge that Solano Printers & Lithographers ever used
 8 any solvents when they operated at 622 Sol- -- Jackson
 9 Street; is that correct?
 10 MR. GRAHAM: Objection, vague and ambiguous,
 11 calls for speculation.
 12 BY MR. NICKOVICH:
 13 Q. And you have no knowledge that Solano Printers
 14 & Lithographers ever used any chlorinated solvents when
 15 they operated at 622 Jackson Street; is that correct?
 16 A. Right.
 17 MR. GRAHAM: Objection, vague and ambiguous,
 18 calls for speculation.
 19 Mr. Keilholtz, if you'd give me one second to
 20 get my objections on record, sir.
 21 THE REPORTER: And I did not get an answer to
 22 the one before --
 23 MR. NICKOVICH: Okay. We'll do it again.
 24 THE REPORTER: -- because I realize you went on
 25 to another question, so --

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1 MR. NICKOVICH: Okay.
 2 THE REPORTER: He said it, but he didn't say it
 3 to me, and I was trying to get everybody. Do you want
 4 me to tell you which one?
 5 MR. NICKOVICH: Yeah, let's -- let's start
 6 where --
 7 THE REPORTER: I just want to be fair because I
 8 didn't lose it, I just didn't hear him. Hold on.
 9 (Whereupon the reporter read back the following
 10 testimony:
 11 "Q. Again, your testimony is that
 12 you have no knowledge that Solano
 13 Printers & Lithographers ever used any
 14 solvents when they operated at
 15 622 Sol- -- Jackson Street; is that
 16 correct?
 17 "MR. GRAHAM: Objection, vague and
 18 ambiguous, calls for speculation.")
 19 THE REPORTER: But he may have answered
 20 something because you went on to a new question.
 21 MR. NICKOVICH: Okay.
 22 THE WITNESS: And my answer was "correct."
 23 THE REPORTER: I didn't hear it. Thanks.
 24 MR. NICKOVICH: Let me start from the
 25 beginning.

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1 THE REPORTER: Just ask that one again.
 2 Thanks.
 3 BY MR. NICKOVICH:
 4 Q. Do you recall from your firsthand knowledge
 5 whether or not any solvents were used by Solano Printers
 6 & Lithographers when they separated at 622 Jackson
 7 Street?
 8 MR. GRAHAM: Objection, vague and ambiguous,
 9 calls for speculation.
 10 THE WITNESS: And I don't recall.
 11 BY MR. NICKOVICH:
 12 Q. Thank you.
 13 Do you recall if any chlorinated solvents were
 14 used by Solano Printers & Lithographers when they
 15 operated at 622 Jackson Street?
 16 MR. GRAHAM: Vague and ambiguous.
 17 THE WITNESS: And I don't recall.
 18 BY MR. NICKOVICH:
 19 Q. Do you recall if perchloroethylene was ever
 20 used by Solano Printers & Lithographers when they
 21 separated at 622 Jackson Street?
 22 MR. GRAHAM: Vague and ambiguous.
 23 THE WITNESS: And I don't recall.
 24 BY MR. NICKOVICH:
 25 Q. Do you recall if tetrachloroethylene was ever

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1 used by Solano Printers & Lithographers when they
 2 separated at 622 Jackson Street?
 3 MR. GRAHAM: Vague and ambiguous.
 4 THE WITNESS: I don't recall.
 5 BY MR. NICKOVICH:
 6 Q. Okay. Do you recall if trichloroethylene was
 7 ever used by Solano Printers & Lithographers when they
 8 operated at 622 Jackson Street?
 9 MR. GRAHAM: Vague and ambiguous.
 10 THE WITNESS: And I don't recall.
 11 MR. NICKOVICH: Thank you. That's all I
 12 have.
 13 EXAMINATION
 14 BY MR. FARRELL:
 15 Q. Mr. Keilholtz, very quickly, Robert Farrell. I
 16 represent the Ragle and Tomasini defendants.
 17 Do you know Mr. Richard Ragle? Did you ever
 18 meet him?
 19 A. No.
 20 Q. What about George Tomasini?
 21 A. No.
 22 Q. Are you familiar at all with a dry cleaner that
 23 was formerly operated at 712 Madison Street in downtown
 24 Fairfield?
 25 A. No.

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1 Q. Do you ever recall visiting a dry cleaner at
 2 that location?
 3 A. No.
 4 MR. FARRELL: Thank you, sir. That's all I
 5 have.
 6 FURTHER EXAMINATION
 7 BY MR. GRAHAM:
 8 Q. Mr. Keilholtz, a couple more questions.
 9 In your experience with printing shop
 10 operations, are you familiar with any printing shop that
 11 conducted letter press printing for the time period of a
 12 year to year and a half where they spent no money on
 13 solvents?
 14 MR. NICKOVICH: Objection, calls for
 15 speculation, asked and answered.
 16 THE WITNESS: If --
 17 BY MR. GRAHAM:
 18 Q. Can you give me one example?
 19 A. Well, I can't name a company, but if somebody
 20 were really messy and dirty or they had very little
 21 work, they could really be in business and not use any
 22 solvents.
 23 I wouldn't recommend that as a company I'd
 24 would want to do business with because they wouldn't be
 25 doing good printing, but people sometimes do strange

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1 things.
 2 Q. Sure.
 3 And would you make that -- such a
 4 recommendation to anyone that operated Solano Printers &
 5 Lithographers during the time that you were involved in
 6 with that company?
 7 A. I wouldn't recommend it, but on the other hand,
 8 it's the kind of thing that would have fallen beneath my
 9 sights, and I probably wouldn't have realized what they
 10 were doing.
 11 Q. So you have no knowledge one way or another how
 12 much money was spent on solvents during the operations
 13 of Solano Printers & Lithographers at the
 14 622/630 Jackson Street?
 15 A. No.
 16 MR. NICKOVICH: Objection, asked and
 17 answered.
 18 BY MR. GRAHAM:
 19 Q. And so when you're saying it's possible that no
 20 money was spent on solvents, you're just speculating as
 21 to that, correct?
 22 MR. NICKOVICH: Objection, asked and
 23 answered.
 24 THE WITNESS: I am speculating.
 25 MR. GRAHAM: Okay. That's all I have for you,

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1 sir.
 2 THE WITNESS: Okay. Am I done?
 3 MR. GRAHAM: I think you are, unless these
 4 folks have more.
 5 (The deposition was concluded at 1:31 p.m.)
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1 Pursuant to Section 2025 (q) (1) of the code of
 2 Civil Procedure of the State of California, I hereby
 3 certify that I have read my deposition transcript, pages
 4 7 - 152, made those changes and corrections that I deem
 5 necessary, and approve the same as now true and correct.
 6
 7 Dated this _____ day of _____, 2011.
 8
 9
 10
 11
 12
 13 _____
 14 SCOTT KEILHOLTZ
 15
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1 I, ANTONIA SEVERSON, a licensed Certified
 2 Shorthand Reporter, duly qualified and certified as such
 3 by the State of California, do hereby certify: That
 4 prior to being examined, the witness named in the
 5 foregoing deposition was by me duly sworn to testify to
 6 the truth, the whole truth, and nothing but the truth;

7 That the said deposition was by me recorded
 8 stenographically at the time and place herein mentioned,
 9 and the foregoing pages constitute a full, true, complete
 10 and correct record of the testimony given by the said
 11 witness;

12 That I am a disinterested person, not being in
 13 any way interested in the outcome of said action, nor
 14 connected with, nor related to any of the parties in said
 15 action, or to their counsel, in any manner whatsoever.

16
 17 Dated this 9th day of November, 2011.

18
 19
 20
 21 _____
 ANTONIA SEVERSON, CSR NO. 3430
 CERTIFIED SHORTHAND REPORTER

22
 23
 24
 25

1 Delta Deposition Reporting
 P.O. Box 7312
 2 Stockton, California 95267
 Phone: (209) 477-0837 (888) 477-0856
 3 Fax: (209) 477-0856
 4
 5

6 Case Name: MICHAEL McINNIS and ROBERT DITTMER vs.
 JEWEL HIRSCH, etc., et al.
 7 Case No: FCS033636
 Date of Deposition: NOVEMBER 3, 2011
 8 Deponent: SCOTT KEILHOLTZ
 9

10 The Original transcript of this deposition was
 available in this office during business hours on
 11 business days for a period of 40 calendar days, and that
 all counsel and deponent were given written notice, in
 12 which the following occurred:
 13

14 The witness and parties waived examination
 and reading of the deposition.

15 The witness corrected, approved or refused
 16 to approve the deposition by letter to
 this office, hereunto attached.

17 The witness appeared in this office,
 18 corrected and signed the deposition
 as indicated herein.

19 The witness refused to sign the
 20 deposition.

21 The witness failed to appear at this
 22 office.

23 Date: _____
 24
 25

1 November 9, 2011
 2
 3 SCOTT KEILHOLTZ
 427 Anchor Lane, #102
 West Sacramento, CA 95605
 4
 5 Re: MICHAEL McINNIS and ROBERT DITTMER vs.
 JEWEL HIRSCH, etc., et al.
 6 Case No. FCS033636
 7

8 Dear Mr. Keilholtz,

9 The transcript of your deposition taken on
 Thursday, November 3, 2011, is now available at this
 10 office for your review, correction (if necessary) and
 signature. A copy of your deposition has been forwarded
 to counsel.

11 If you have any questions about reading or
 signing your deposition, you may wish to discuss with
 12 counsel whether it is desirable for you to review,
 correct, and sign the transcript before it is filed with
 13 the court.

14 You have thirty days from the date of this
 letter within which to review the transcript. If you so
 wish to review it, please call this office to arrange
 15 for an appointment.

16
 17
 18 Very truly yours,
 19
 20 Casie Takhar-Hidalgo
 Office Manager
 Delta Deposition

21 cc - all counsel
 22
 23
 24
 25

<p style="text-align: center;">A</p> <p>ability 11:4 79:8 able 93:1 119:16 Abrew 135:22,23 135:25 136:5 137:3,6,10 absolutely 46:24 67:6 74:14 113:14 116:1 absorbed 106:14 106:16 absorption 30:21 abutted 62:3 access 44:14 63:5 accommodate 10:9 Accounting 117:20 acquisition 38:9 39:13 acquisitions 12:16 12:18 action 154:13,15 Adams 136:9 adding 29:20 additional 13:22 35:11 47:20 59:14 126:20 address 63:20 86:8 140:10 adhere 25:22 27:23 33:22 adjacent 61:24 62:17 100:15 ads 23:18 advertising 23:17 23:19 advice 12:19 65:5 Aerojet 23:12,15 35:13 affect 10:23 affiliated 79:19 affiliation 127:19 127:23 afford 49:13 afterburners 50:17 age 115:13 agencies 50:10</p>	<p>agency 38:24 39:2 50:11 51:13 ago 16:25 45:11 46:15 50:21 76:16 135:6 agreeable 9:17 agreement 84:16 ahead 33:2 42:2 134:4 139:23 air 51:9 al 50:15 155:5 156:6 alcohol 11:3 19:14 alcohol-based 106:2 Alice 1:11,12 alive 60:22,24,25 95:8 116:14,14 137:8 allegations 50:10 alleged 50:12 alley 62:17,20 Allison 2:11 134:8 allusion 56:19 All's 67:1 Alto 15:25 16:2 amazed 83:25 84:2 ambiguous 143:19 144:9,17 145:5 146:10,17 147:18 148:8,16,22 149:3 149:9 America 93:4 American 15:3,4,6 43:14 44:3,7,17 amount 19:14 35:14 124:4 140:25 142:16,19 143:1,8,14,16 144:14 Anchor 155:3 Annette 74:22 announcements 59:17 annual 143:17 144:2</p>	<p>Anshin 54:10 answer 9:15 53:1 53:16,17 76:18 129:15 142:8 146:21 147:22 answered 72:14 147:19 150:15 151:17,23 answers 9:19 10:5 10:21 anticipating 125:9 Antonia 1:25 5:9 7:4 154:1,21 anybody 49:19 57:1 anymore 34:12 45:2 anyway 44:15 apologize 112:5 appear 74:24 156:23 appearance 6:12 42:14 appeared 7:6 156:18 appears 75:2 APPLEBY-STE... 4:14 applied 108:3 applies 69:8 apply 34:14 appointment 155:15 appreciate 119:20 133:25 appropriate 26:17 approve 153:5 156:16 approved 156:16 approximately 31:20 39:20 41:24 46:15 63:11 67:22 68:21 82:1 96:23 113:5 128:5 arabic 35:3 area 30:6 62:8 63:2</p>	<p>87:24 118:19,23 119:5,7,8 areas 11:12 45:14 arising 50:22 Army 21:5,11 ARNOLD 3:10 arrange 155:14 arrangement 81:2 Articles 6:15 74:4 74:25 ascertained 97:5 aside 105:7,12 112:7 asked 72:14 83:21 94:19 100:6 111:19 122:8 142:16,18 150:15 151:16,22 asking 40:5 55:19 66:20 86:15 118:9 118:11 ASSAD 1:13,13 2:20,20 assistant 136:5 associated 78:14 ASSOCIATES 3:21 assortment 43:15 assume 65:3 75:3 84:20,20 103:4 126:17 assumes 127:3 129:23 131:24 132:15 138:24 assuming 58:12 66:15 75:12,23 77:14 78:24 assumption 105:12 140:16 143:13 attached 156:17 attend 15:10 20:16 20:18,19,22 attention 27:14 68:6 70:25 71:19 71:24 74:7 ATTIEH 1:13 2:20</p>	<p>attorney 2:6,11,17 3:5,24 4:7 46:7,8 attorneys 2:24 3:13 4:23 53:14 54:6 54:12 133:21 audit 43:21 authors 56:7 automated 95:18 automatic 95:25 96:8,17,20,21,22 96:23,25 98:18 107:17 109:1 111:15 126:24 140:14 automatically 95:19 available 55:4 130:23 155:9 156:10 Avenue 2:22 aware 19:1,3 28:16 46:20,21 48:7,24 50:4,9 61:23 66:12 81:6 83:5 83:15,18 92:2 100:14 104:12 114:15,18 122:18 124:6 130:25 131:4,20 awful 109:18 122:5 awhile 86:3 A-b-r-e-w 135:23 a.m 7:3</p>
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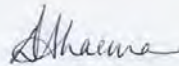
ANALYTICAL REPORT

TestAmerica Laboratories, Inc.
TestAmerica San Francisco
1220 Quarry Lane
Pleasanton, CA 94566
Tel: (925)484-1919

TestAmerica Job ID: 720-37099-1
Client Project/Site: Fairfield

For:
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Attn: Mr. Sam Brathwaite



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Definitions/Glossary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Qualifiers

GC/MS VOA

Qualifier	Qualifier Description
X	Surrogate is outside control limits

GC Semi VOA

Qualifier	Qualifier Description
D	Surrogate or matrix spike recoveries were not obtained because the extract was diluted for analysis; also compounds analyzed at a dilution may be flagged with a D.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
☼	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
DL, RA, RE, IN	Indicates a Dilution, Reanalysis, Re-extraction, or additional Initial metals/anion analysis of the sample
EDL	Estimated Detection Limit (Dioxin)
EPA	United States Environmental Protection Agency
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
ND	Not detected at the reporting limit (or method detection limit if shown)
PQL	Practical Quantitation Limit
RL	Reporting Limit
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)

Case Narrative

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Job ID: 720-37099-1

Laboratory: TestAmerica San Francisco

Narrative

Job Narrative
720-37099-1

Comments

No additional comments.

Receipt

All samples were received in good condition within temperature requirements.

GC/MS VOA

Method 8260B: Surrogate recovery for the following sample was outside the control limits due to bad matrix(Hydrocarbon): GC-1-5'-3" (720-37099-2), GC-1A-S-3' (720-37099-6). Evidence of matrix interference is present.

Method 8260B: The Gasoline Range Organics (GRO) concentration reported for the following sample is due to the presence of discrete peaks: GC-2-GW-23' (720-37099-4).

No other analytical or quality issues were noted.

GC VOA

No analytical or quality issues were noted.

GC Semi VOA

Method 8015B: Due to the level of dilution required for the following sample, surrogate recoveries are not reported: (720-37121-2 MS), (720-37121-2 MSD), GC-1A-S-3' (720-37099-6), MB-99-10.0 (720-37121-2).

No other analytical or quality issues were noted.

Organic Prep

No analytical or quality issues were noted.



Detection Summary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Client Sample ID: TB-082311

Lab Sample ID: 720-37099-1

No Detections

Client Sample ID: GC-1-5'-3"

Lab Sample ID: 720-37099-2

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Gasoline Range Organics (GRO) -C5-C12	280000		24000		ug/Kg	100		8260B/CA_LUFTM	Total/NA
sec-Butylbenzene	1300		24		ug/Kg	1		8260B	Total/NA
tert-Butylbenzene	91		24		ug/Kg	1		8260B	Total/NA
Isopropylbenzene	500		24		ug/Kg	1		8260B	Total/NA
N-Propylbenzene	290		24		ug/Kg	1		8260B	Total/NA
Diesel Range Organics [C10-C28]	170		2.0		mg/Kg	2		8015B	Total/NA
Stoddard Solvent Range Organics (C9-C13)	210		2.0		mg/Kg	2		8015B	Total/NA

Client Sample ID: GC-2-GW-10'

Lab Sample ID: 720-37099-3

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
sec-Butylbenzene	150		1.0		ug/L	1		8260B	Total/NA
tert-Butylbenzene	9.1		1.0		ug/L	1		8260B	Total/NA
1,2-Dichlorobenzene	0.82		0.50		ug/L	1		8260B	Total/NA
Ethylbenzene	0.51		0.50		ug/L	1		8260B	Total/NA
Isopropylbenzene	47		0.50		ug/L	1		8260B	Total/NA
N-Propylbenzene	100		1.0		ug/L	1		8260B	Total/NA
1,3,5-Trimethylbenzene	1.1		0.50		ug/L	1		8260B	Total/NA
Gasoline Range Organics (GRO) -C5-C12	24000		2500		ug/L	50		8260B	Total/NA

Client Sample ID: GC-2-GW-23'

Lab Sample ID: 720-37099-4

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
cis-1,2-Dichloroethene	16		0.50		ug/L	1		8260B	Total/NA
Tetrachloroethene	75		0.50		ug/L	1		8260B	Total/NA
Trichloroethene	7.0		0.50		ug/L	1		8260B	Total/NA
Gasoline Range Organics (GRO) -C5-C12	110		50		ug/L	1		8260B	Total/NA

Client Sample ID: GC-1-GW-22.5'

Lab Sample ID: 720-37099-5

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
cis-1,2-Dichloroethene	50		0.50		ug/L	1		8260B	Total/NA
trans-1,2-Dichloroethene	1.8		0.50		ug/L	1		8260B	Total/NA
Tetrachloroethene	670		10		ug/L	1		8260B	Total/NA
Trichloroethene	22		0.50		ug/L	1		8260B	Total/NA
Vinyl chloride	2.1		0.50		ug/L	1		8260B	Total/NA

Client Sample ID: GC-1A-S-3'

Lab Sample ID: 720-37099-6

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
sec-Butylbenzene	2200		490		ug/Kg	100		8260B/CA_LUFTM	Total/NA
N-Propylbenzene	2300		490		ug/Kg	100		8260B/CA_LUFTM	Total/NA
Gasoline Range Organics (GRO) -C5-C12	310000		25000		ug/Kg	100		8260B/CA_LUFTM	Total/NA
n-Butylbenzene	880		24		ug/Kg	1		8260B	Total/NA
tert-Butylbenzene	180		24		ug/Kg	1		8260B	Total/NA
1,2-Dibromo-3-Chloropropane	70		24		ug/Kg	1		8260B	Total/NA

Detection Summary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Client Sample ID: GC-1A-S-3' (Continued)

Lab Sample ID: 720-37099-6

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Isopropylbenzene	1200		24		ug/Kg	1		8260B	Total/NA
Diesel Range Organics [C10-C28]	450		5.0		mg/Kg	5		8015B	Total/NA
Stoddard Solvent Range Organics (C9-C13)	610		5.0		mg/Kg	5		8015B	Total/NA

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B/CA_LUFTMS - 8260B / CA LUFT MS

Client Sample ID: GC-1-5'-3"
Date Collected: 08/23/11 11:15
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-2
Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics (GRO) -C5-C12	280000		24000		ug/Kg		08/29/11 08:00	08/29/11 14:17	100
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	131		66 - 148				08/29/11 08:00	08/29/11 14:17	100
1,2-Dichloroethane-d4 (Surr)	87		62 - 137				08/29/11 08:00	08/29/11 14:17	100
Toluene-d8 (Surr)	97		65 - 141				08/29/11 08:00	08/29/11 14:17	100

Client Sample ID: GC-1A-S-3'
Date Collected: 08/23/11 14:50
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-6
Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
sec-Butylbenzene	2200		490		ug/Kg		08/29/11 08:00	08/29/11 13:46	100
N-Propylbenzene	2300		490		ug/Kg		08/29/11 08:00	08/29/11 13:46	100
Gasoline Range Organics (GRO) -C5-C12	310000		25000		ug/Kg		08/29/11 08:00	08/29/11 13:46	100
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	129		66 - 148				08/29/11 08:00	08/29/11 13:46	100
1,2-Dichloroethane-d4 (Surr)	92		62 - 137				08/29/11 08:00	08/29/11 13:46	100
Toluene-d8 (Surr)	98		65 - 141				08/29/11 08:00	08/29/11 13:46	100

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Client Sample ID: TB-082311
Date Collected: 08/23/11 00:00
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-1
Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		0.50		ug/L			08/25/11 15:00	1
Acetone	ND		50		ug/L			08/25/11 15:00	1
Benzene	ND		0.50		ug/L			08/25/11 15:00	1
Dichlorobromomethane	ND		0.50		ug/L			08/25/11 15:00	1
Bromobenzene	ND		1.0		ug/L			08/25/11 15:00	1
Chlorobromomethane	ND		1.0		ug/L			08/25/11 15:00	1
Bromoform	ND		1.0		ug/L			08/25/11 15:00	1
Bromomethane	ND		1.0		ug/L			08/25/11 15:00	1
2-Butanone (MEK)	ND		50		ug/L			08/25/11 15:00	1
n-Butylbenzene	ND		1.0		ug/L			08/25/11 15:00	1
sec-Butylbenzene	ND		1.0		ug/L			08/25/11 15:00	1
tert-Butylbenzene	ND		1.0		ug/L			08/25/11 15:00	1
Carbon disulfide	ND		5.0		ug/L			08/25/11 15:00	1
Carbon tetrachloride	ND		0.50		ug/L			08/25/11 15:00	1
Chlorobenzene	ND		0.50		ug/L			08/25/11 15:00	1
Chloroethane	ND		1.0		ug/L			08/25/11 15:00	1
Chloroform	ND		1.0		ug/L			08/25/11 15:00	1
Chloromethane	ND		1.0		ug/L			08/25/11 15:00	1
2-Chlorotoluene	ND		0.50		ug/L			08/25/11 15:00	1
4-Chlorotoluene	ND		0.50		ug/L			08/25/11 15:00	1
Chlorodibromomethane	ND		0.50		ug/L			08/25/11 15:00	1
1,2-Dichlorobenzene	ND		0.50		ug/L			08/25/11 15:00	1
1,3-Dichlorobenzene	ND		0.50		ug/L			08/25/11 15:00	1
1,4-Dichlorobenzene	ND		0.50		ug/L			08/25/11 15:00	1
1,3-Dichloropropane	ND		1.0		ug/L			08/25/11 15:00	1
1,1-Dichloropropene	ND		0.50		ug/L			08/25/11 15:00	1
1,2-Dibromo-3-Chloropropane	ND		1.0		ug/L			08/25/11 15:00	1
Ethylene Dibromide	ND		0.50		ug/L			08/25/11 15:00	1
Dibromomethane	ND		0.50		ug/L			08/25/11 15:00	1
Dichlorodifluoromethane	ND		0.50		ug/L			08/25/11 15:00	1
1,1-Dichloroethane	ND		0.50		ug/L			08/25/11 15:00	1
1,2-Dichloroethane	ND		0.50		ug/L			08/25/11 15:00	1
1,1-Dichloroethene	ND		0.50		ug/L			08/25/11 15:00	1
cis-1,2-Dichloroethene	ND		0.50		ug/L			08/25/11 15:00	1
trans-1,2-Dichloroethene	ND		0.50		ug/L			08/25/11 15:00	1
1,2-Dichloropropane	ND		0.50		ug/L			08/25/11 15:00	1
cis-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 15:00	1
trans-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 15:00	1
Ethylbenzene	ND		0.50		ug/L			08/25/11 15:00	1
Hexachlorobutadiene	ND		1.0		ug/L			08/25/11 15:00	1
2-Hexanone	ND		50		ug/L			08/25/11 15:00	1
Isopropylbenzene	ND		0.50		ug/L			08/25/11 15:00	1
4-Isopropyltoluene	ND		1.0		ug/L			08/25/11 15:00	1
Methylene Chloride	ND		5.0		ug/L			08/25/11 15:00	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/L			08/25/11 15:00	1
Naphthalene	ND		1.0		ug/L			08/25/11 15:00	1
N-Propylbenzene	ND		1.0		ug/L			08/25/11 15:00	1
Styrene	ND		0.50		ug/L			08/25/11 15:00	1
1,1,1,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 15:00	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: TB-082311
Date Collected: 08/23/11 00:00
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-1
Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,1,2,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 15:00	1
Tetrachloroethene	ND		0.50		ug/L			08/25/11 15:00	1
Toluene	ND		0.50		ug/L			08/25/11 15:00	1
1,2,3-Trichlorobenzene	ND		1.0		ug/L			08/25/11 15:00	1
1,2,4-Trichlorobenzene	ND		1.0		ug/L			08/25/11 15:00	1
1,1,1-Trichloroethane	ND		0.50		ug/L			08/25/11 15:00	1
1,1,2-Trichloroethane	ND		0.50		ug/L			08/25/11 15:00	1
Trichloroethene	ND		0.50		ug/L			08/25/11 15:00	1
Trichlorofluoromethane	ND		1.0		ug/L			08/25/11 15:00	1
1,2,3-Trichloropropane	ND		0.50		ug/L			08/25/11 15:00	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		0.50		ug/L			08/25/11 15:00	1
1,2,4-Trimethylbenzene	ND		0.50		ug/L			08/25/11 15:00	1
1,3,5-Trimethylbenzene	ND		0.50		ug/L			08/25/11 15:00	1
Vinyl acetate	ND		10		ug/L			08/25/11 15:00	1
Vinyl chloride	ND		0.50		ug/L			08/25/11 15:00	1
Xylenes, Total	ND		1.0		ug/L			08/25/11 15:00	1
2,2-Dichloropropane	ND		0.50		ug/L			08/25/11 15:00	1
Gasoline Range Organics (GRO) -C5-C12	ND		50		ug/L			08/25/11 15:00	1

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	94		67 - 130		08/25/11 15:00	1
1,2-Dichloroethane-d4 (Surr)	91		67 - 130		08/25/11 15:00	1
Toluene-d8 (Surr)	100		70 - 130		08/25/11 15:00	1

Client Sample ID: GC-1-5'-3"
Date Collected: 08/23/11 11:15
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-2
Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Acetone	ND		240		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Benzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Dichlorobromomethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Bromobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Chlorobromomethane	ND		94		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Bromoform	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Bromomethane	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
2-Butanone (MEK)	ND		240		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
n-Butylbenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
sec-Butylbenzene	1300		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
tert-Butylbenzene	91		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Carbon disulfide	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Carbon tetrachloride	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Chlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Chloroethane	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Chloroform	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Chloromethane	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
2-Chlorotoluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
4-Chlorotoluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: GC-1-5'-3"
Date Collected: 08/23/11 11:15
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-2
Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Chlorodibromomethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2-Dichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,3-Dichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,4-Dichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,3-Dichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1-Dichloropropene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2-Dibromo-3-Chloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Ethylene Dibromide	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Dibromomethane	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Dichlorodifluoromethane	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1-Dichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2-Dichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1-Dichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
cis-1,2-Dichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
trans-1,2-Dichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2-Dichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
cis-1,3-Dichloropropene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
trans-1,3-Dichloropropene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Ethylbenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Hexachlorobutadiene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
2-Hexanone	ND		240		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Isopropylbenzene	500		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
4-Isopropyltoluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Methylene Chloride	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
4-Methyl-2-pentanone (MIBK)	ND		240		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Naphthalene	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
N-Propylbenzene	290		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Styrene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1,1,2-Tetrachloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1,2,2-Tetrachloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Tetrachloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Toluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2,3-Trichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2,4-Trichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1,1-Trichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1,2-Trichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Trichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Trichlorofluoromethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2,3-Trichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,2,4-Trimethylbenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
1,3,5-Trimethylbenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Vinyl acetate	ND		240		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Vinyl chloride	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
Xylenes, Total	ND		47		ug/Kg		08/24/11 14:13	08/25/11 05:07	1
2,2-Dichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 05:07	1

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	0	X	45 - 131	08/24/11 14:13	08/25/11 05:07	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: GC-1-5'-3"
Date Collected: 08/23/11 11:15
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-2
Matrix: Solid

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
1,2-Dichloroethane-d4 (Surr)	103		60 - 140	08/24/11 14:13	08/25/11 05:07	1
Toluene-d8 (Surr)	108		58 - 140	08/24/11 14:13	08/25/11 05:07	1

Client Sample ID: GC-2-GW-10'
Date Collected: 08/23/11 11:30
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-3
Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		0.50		ug/L			08/25/11 03:51	1
Acetone	ND		50		ug/L			08/25/11 03:51	1
Benzene	ND		0.50		ug/L			08/25/11 03:51	1
Dichlorobromomethane	ND		0.50		ug/L			08/25/11 03:51	1
Bromobenzene	ND		1.0		ug/L			08/25/11 03:51	1
Chlorobromomethane	ND		1.0		ug/L			08/25/11 03:51	1
Bromoform	ND		1.0		ug/L			08/25/11 03:51	1
Bromomethane	ND		1.0		ug/L			08/25/11 03:51	1
2-Butanone (MEK)	ND		50		ug/L			08/25/11 03:51	1
n-Butylbenzene	ND		1.0		ug/L			08/25/11 03:51	1
sec-Butylbenzene	150		1.0		ug/L			08/25/11 03:51	1
tert-Butylbenzene	9.1		1.0		ug/L			08/25/11 03:51	1
Carbon disulfide	ND		5.0		ug/L			08/25/11 03:51	1
Carbon tetrachloride	ND		0.50		ug/L			08/25/11 03:51	1
Chlorobenzene	ND		0.50		ug/L			08/25/11 03:51	1
Chloroethane	ND		1.0		ug/L			08/25/11 03:51	1
Chloroform	ND		1.0		ug/L			08/25/11 03:51	1
Chloromethane	ND		1.0		ug/L			08/25/11 03:51	1
2-Chlorotoluene	ND		0.50		ug/L			08/25/11 03:51	1
4-Chlorotoluene	ND		0.50		ug/L			08/25/11 03:51	1
Chlorodibromomethane	ND		0.50		ug/L			08/25/11 03:51	1
1,2-Dichlorobenzene	0.82		0.50		ug/L			08/25/11 03:51	1
1,3-Dichlorobenzene	ND		0.50		ug/L			08/25/11 03:51	1
1,4-Dichlorobenzene	ND		0.50		ug/L			08/25/11 03:51	1
1,3-Dichloropropane	ND		1.0		ug/L			08/25/11 03:51	1
1,1-Dichloropropene	ND		0.50		ug/L			08/25/11 03:51	1
1,2-Dibromo-3-Chloropropane	ND		1.0		ug/L			08/25/11 03:51	1
Ethylene Dibromide	ND		0.50		ug/L			08/25/11 03:51	1
Dibromomethane	ND		0.50		ug/L			08/25/11 03:51	1
Dichlorodifluoromethane	ND		0.50		ug/L			08/25/11 03:51	1
1,1-Dichloroethane	ND		0.50		ug/L			08/25/11 03:51	1
1,2-Dichloroethane	ND		0.50		ug/L			08/25/11 03:51	1
1,1-Dichloroethene	ND		0.50		ug/L			08/25/11 03:51	1
cis-1,2-Dichloroethene	ND		0.50		ug/L			08/25/11 03:51	1
trans-1,2-Dichloroethene	ND		0.50		ug/L			08/25/11 03:51	1
1,2-Dichloropropane	ND		0.50		ug/L			08/25/11 03:51	1
cis-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 03:51	1
trans-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 03:51	1
Ethylbenzene	0.51		0.50		ug/L			08/25/11 03:51	1
Hexachlorobutadiene	ND		1.0		ug/L			08/25/11 03:51	1
2-Hexanone	ND		50		ug/L			08/25/11 03:51	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: GC-2-GW-10'

Date Collected: 08/23/11 11:30

Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-3

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Isopropylbenzene	47		0.50		ug/L			08/25/11 03:51	1
4-Isopropyltoluene	ND		1.0		ug/L			08/25/11 03:51	1
Methylene Chloride	ND		5.0		ug/L			08/25/11 03:51	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/L			08/25/11 03:51	1
Naphthalene	ND		1.0		ug/L			08/25/11 03:51	1
N-Propylbenzene	100		1.0		ug/L			08/25/11 03:51	1
Styrene	ND		0.50		ug/L			08/25/11 03:51	1
1,1,1,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 03:51	1
1,1,2,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 03:51	1
Tetrachloroethene	ND		0.50		ug/L			08/25/11 03:51	1
Toluene	ND		0.50		ug/L			08/25/11 03:51	1
1,2,3-Trichlorobenzene	ND		1.0		ug/L			08/25/11 03:51	1
1,2,4-Trichlorobenzene	ND		1.0		ug/L			08/25/11 03:51	1
1,1,1-Trichloroethane	ND		0.50		ug/L			08/25/11 03:51	1
1,1,2-Trichloroethane	ND		0.50		ug/L			08/25/11 03:51	1
Trichloroethene	ND		0.50		ug/L			08/25/11 03:51	1
Trichlorofluoromethane	ND		1.0		ug/L			08/25/11 03:51	1
1,2,3-Trichloropropane	ND		0.50		ug/L			08/25/11 03:51	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		0.50		ug/L			08/25/11 03:51	1
1,2,4-Trimethylbenzene	ND		0.50		ug/L			08/25/11 03:51	1
1,3,5-Trimethylbenzene	1.1		0.50		ug/L			08/25/11 03:51	1
Vinyl acetate	ND		10		ug/L			08/25/11 03:51	1
Vinyl chloride	ND		0.50		ug/L			08/25/11 03:51	1
Xylenes, Total	ND		1.0		ug/L			08/25/11 03:51	1
2,2-Dichloropropane	ND		0.50		ug/L			08/25/11 03:51	1
Gasoline Range Organics (GRO)	24000		2500		ug/L			08/27/11 15:44	50

-C5-C12

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	35	X	67 - 130		08/25/11 03:51	1
4-Bromofluorobenzene	110		67 - 130		08/27/11 15:44	50
1,2-Dichloroethane-d4 (Surr)	96		67 - 130		08/25/11 03:51	1
1,2-Dichloroethane-d4 (Surr)	117		67 - 130		08/27/11 15:44	50
Toluene-d8 (Surr)	105		70 - 130		08/25/11 03:51	1
Toluene-d8 (Surr)	99		70 - 130		08/27/11 15:44	50

Client Sample ID: GC-2-GW-23'

Date Collected: 08/23/11 13:10

Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-4

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		0.50		ug/L			08/25/11 04:21	1
Acetone	ND		50		ug/L			08/25/11 04:21	1
Benzene	ND		0.50		ug/L			08/25/11 04:21	1
Dichlorobromomethane	ND		0.50		ug/L			08/25/11 04:21	1
Bromobenzene	ND		1.0		ug/L			08/25/11 04:21	1
Chlorobromomethane	ND		1.0		ug/L			08/25/11 04:21	1
Bromoform	ND		1.0		ug/L			08/25/11 04:21	1
Bromomethane	ND		1.0		ug/L			08/25/11 04:21	1
2-Butanone (MEK)	ND		50		ug/L			08/25/11 04:21	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: GC-2-GW-23'

Date Collected: 08/23/11 13:10

Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-4

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
n-Butylbenzene	ND		1.0		ug/L			08/25/11 04:21	1
sec-Butylbenzene	ND		1.0		ug/L			08/25/11 04:21	1
tert-Butylbenzene	ND		1.0		ug/L			08/25/11 04:21	1
Carbon disulfide	ND		5.0		ug/L			08/25/11 04:21	1
Carbon tetrachloride	ND		0.50		ug/L			08/25/11 04:21	1
Chlorobenzene	ND		0.50		ug/L			08/25/11 04:21	1
Chloroethane	ND		1.0		ug/L			08/25/11 04:21	1
Chloroform	ND		1.0		ug/L			08/25/11 04:21	1
Chloromethane	ND		1.0		ug/L			08/25/11 04:21	1
2-Chlorotoluene	ND		0.50		ug/L			08/25/11 04:21	1
4-Chlorotoluene	ND		0.50		ug/L			08/25/11 04:21	1
Chlorodibromomethane	ND		0.50		ug/L			08/25/11 04:21	1
1,2-Dichlorobenzene	ND		0.50		ug/L			08/25/11 04:21	1
1,3-Dichlorobenzene	ND		0.50		ug/L			08/25/11 04:21	1
1,4-Dichlorobenzene	ND		0.50		ug/L			08/25/11 04:21	1
1,3-Dichloropropane	ND		1.0		ug/L			08/25/11 04:21	1
1,1-Dichloropropene	ND		0.50		ug/L			08/25/11 04:21	1
1,2-Dibromo-3-Chloropropane	ND		1.0		ug/L			08/25/11 04:21	1
Ethylene Dibromide	ND		0.50		ug/L			08/25/11 04:21	1
Dibromomethane	ND		0.50		ug/L			08/25/11 04:21	1
Dichlorodifluoromethane	ND		0.50		ug/L			08/25/11 04:21	1
1,1-Dichloroethane	ND		0.50		ug/L			08/25/11 04:21	1
1,2-Dichloroethane	ND		0.50		ug/L			08/25/11 04:21	1
1,1-Dichloroethene	ND		0.50		ug/L			08/25/11 04:21	1
cis-1,2-Dichloroethene	16		0.50		ug/L			08/25/11 04:21	1
trans-1,2-Dichloroethene	ND		0.50		ug/L			08/25/11 04:21	1
1,2-Dichloropropane	ND		0.50		ug/L			08/25/11 04:21	1
cis-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 04:21	1
trans-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 04:21	1
Ethylbenzene	ND		0.50		ug/L			08/25/11 04:21	1
Hexachlorobutadiene	ND		1.0		ug/L			08/25/11 04:21	1
2-Hexanone	ND		50		ug/L			08/25/11 04:21	1
Isopropylbenzene	ND		0.50		ug/L			08/25/11 04:21	1
4-Isopropyltoluene	ND		1.0		ug/L			08/25/11 04:21	1
Methylene Chloride	ND		5.0		ug/L			08/25/11 04:21	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/L			08/25/11 04:21	1
Naphthalene	ND		1.0		ug/L			08/25/11 04:21	1
N-Propylbenzene	ND		1.0		ug/L			08/25/11 04:21	1
Styrene	ND		0.50		ug/L			08/25/11 04:21	1
1,1,1,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 04:21	1
1,1,1,2,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 04:21	1
Tetrachloroethene	75		0.50		ug/L			08/25/11 04:21	1
Toluene	ND		0.50		ug/L			08/25/11 04:21	1
1,2,3-Trichlorobenzene	ND		1.0		ug/L			08/25/11 04:21	1
1,2,4-Trichlorobenzene	ND		1.0		ug/L			08/25/11 04:21	1
1,1,1-Trichloroethane	ND		0.50		ug/L			08/25/11 04:21	1
1,1,1,2-Trichloroethane	ND		0.50		ug/L			08/25/11 04:21	1
Trichloroethene	7.0		0.50		ug/L			08/25/11 04:21	1
Trichlorofluoromethane	ND		1.0		ug/L			08/25/11 04:21	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: GC-2-GW-23'

Date Collected: 08/23/11 13:10

Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-4

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,2,3-Trichloropropane	ND		0.50		ug/L			08/25/11 04:21	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		0.50		ug/L			08/25/11 04:21	1
1,2,4-Trimethylbenzene	ND		0.50		ug/L			08/25/11 04:21	1
1,3,5-Trimethylbenzene	ND		0.50		ug/L			08/25/11 04:21	1
Vinyl acetate	ND		10		ug/L			08/25/11 04:21	1
Vinyl chloride	ND		0.50		ug/L			08/25/11 04:21	1
Xylenes, Total	ND		1.0		ug/L			08/25/11 04:21	1
2,2-Dichloropropane	ND		0.50		ug/L			08/25/11 04:21	1
Gasoline Range Organics (GRO) -C5-C12	110		50		ug/L			08/27/11 16:13	1

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	102		67 - 130		08/25/11 04:21	1
4-Bromofluorobenzene	100		67 - 130		08/27/11 16:13	1
1,2-Dichloroethane-d4 (Surr)	91		67 - 130		08/25/11 04:21	1
1,2-Dichloroethane-d4 (Surr)	117		67 - 130		08/27/11 16:13	1
Toluene-d8 (Surr)	102		70 - 130		08/25/11 04:21	1
Toluene-d8 (Surr)	99		70 - 130		08/27/11 16:13	1

Client Sample ID: GC-1-GW-22.5'

Date Collected: 08/23/11 14:25

Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-5

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		0.50		ug/L			08/25/11 04:52	1
Acetone	ND		50		ug/L			08/25/11 04:52	1
Benzene	ND		0.50		ug/L			08/25/11 04:52	1
Dichlorobromomethane	ND		0.50		ug/L			08/25/11 04:52	1
Bromobenzene	ND		1.0		ug/L			08/25/11 04:52	1
Chlorobromomethane	ND		1.0		ug/L			08/25/11 04:52	1
Bromoform	ND		1.0		ug/L			08/25/11 04:52	1
Bromomethane	ND		1.0		ug/L			08/25/11 04:52	1
2-Butanone (MEK)	ND		50		ug/L			08/25/11 04:52	1
n-Butylbenzene	ND		1.0		ug/L			08/25/11 04:52	1
sec-Butylbenzene	ND		1.0		ug/L			08/25/11 04:52	1
tert-Butylbenzene	ND		1.0		ug/L			08/25/11 04:52	1
Carbon disulfide	ND		5.0		ug/L			08/25/11 04:52	1
Carbon tetrachloride	ND		0.50		ug/L			08/25/11 04:52	1
Chlorobenzene	ND		0.50		ug/L			08/25/11 04:52	1
Chloroethane	ND		1.0		ug/L			08/25/11 04:52	1
Chloroform	ND		1.0		ug/L			08/25/11 04:52	1
Chloromethane	ND		1.0		ug/L			08/25/11 04:52	1
2-Chlorotoluene	ND		0.50		ug/L			08/25/11 04:52	1
4-Chlorotoluene	ND		0.50		ug/L			08/25/11 04:52	1
Chlorodibromomethane	ND		0.50		ug/L			08/25/11 04:52	1
1,2-Dichlorobenzene	ND		0.50		ug/L			08/25/11 04:52	1
1,3-Dichlorobenzene	ND		0.50		ug/L			08/25/11 04:52	1
1,4-Dichlorobenzene	ND		0.50		ug/L			08/25/11 04:52	1
1,3-Dichloropropane	ND		1.0		ug/L			08/25/11 04:52	1
1,1-Dichloropropene	ND		0.50		ug/L			08/25/11 04:52	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: GC-1-GW-22.5'

Date Collected: 08/23/11 14:25

Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-5

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
1,2-Dibromo-3-Chloropropane	ND		1.0		ug/L			08/25/11 04:52	1
Ethylene Dibromide	ND		0.50		ug/L			08/25/11 04:52	1
Dibromomethane	ND		0.50		ug/L			08/25/11 04:52	1
Dichlorodifluoromethane	ND		0.50		ug/L			08/25/11 04:52	1
1,1-Dichloroethane	ND		0.50		ug/L			08/25/11 04:52	1
1,2-Dichloroethane	ND		0.50		ug/L			08/25/11 04:52	1
1,1-Dichloroethene	ND		0.50		ug/L			08/25/11 04:52	1
cis-1,2-Dichloroethene	50		0.50		ug/L			08/25/11 04:52	1
trans-1,2-Dichloroethene	1.8		0.50		ug/L			08/25/11 04:52	1
1,2-Dichloropropane	ND		0.50		ug/L			08/25/11 04:52	1
cis-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 04:52	1
trans-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 04:52	1
Ethylbenzene	ND		0.50		ug/L			08/25/11 04:52	1
Hexachlorobutadiene	ND		1.0		ug/L			08/25/11 04:52	1
2-Hexanone	ND		50		ug/L			08/25/11 04:52	1
Isopropylbenzene	ND		0.50		ug/L			08/25/11 04:52	1
4-Isopropyltoluene	ND		1.0		ug/L			08/25/11 04:52	1
Methylene Chloride	ND		5.0		ug/L			08/25/11 04:52	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/L			08/25/11 04:52	1
Naphthalene	ND		1.0		ug/L			08/25/11 04:52	1
N-Propylbenzene	ND		1.0		ug/L			08/25/11 04:52	1
Styrene	ND		0.50		ug/L			08/25/11 04:52	1
1,1,1,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 04:52	1
1,1,2,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 04:52	1
Tetrachloroethene	670		10		ug/L			08/29/11 13:49	1
Toluene	ND		0.50		ug/L			08/25/11 04:52	1
1,2,3-Trichlorobenzene	ND		1.0		ug/L			08/25/11 04:52	1
1,2,4-Trichlorobenzene	ND		1.0		ug/L			08/25/11 04:52	1
1,1,1-Trichloroethane	ND		0.50		ug/L			08/25/11 04:52	1
1,1,2-Trichloroethane	ND		0.50		ug/L			08/25/11 04:52	1
Trichloroethene	22		0.50		ug/L			08/25/11 04:52	1
Trichlorofluoromethane	ND		1.0		ug/L			08/25/11 04:52	1
1,2,3-Trichloropropane	ND		0.50		ug/L			08/25/11 04:52	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		0.50		ug/L			08/25/11 04:52	1
1,2,4-Trimethylbenzene	ND		0.50		ug/L			08/25/11 04:52	1
1,3,5-Trimethylbenzene	ND		0.50		ug/L			08/25/11 04:52	1
Vinyl acetate	ND		10		ug/L			08/25/11 04:52	1
Vinyl chloride	2.1		0.50		ug/L			08/25/11 04:52	1
Xylenes, Total	ND		1.0		ug/L			08/25/11 04:52	1
2,2-Dichloropropane	ND		0.50		ug/L			08/25/11 04:52	1
Gasoline Range Organics (GRO) -C5-C12	ND		1000		ug/L			08/29/11 13:49	1

Surrogate	% Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	102		67 - 130		08/25/11 04:52	1
4-Bromofluorobenzene	93		67 - 130		08/29/11 13:49	1
1,2-Dichloroethane-d4 (Surr)	90		67 - 130		08/25/11 04:52	1
1,2-Dichloroethane-d4 (Surr)	94		67 - 130		08/29/11 13:49	1
Toluene-d8 (Surr)	102		70 - 130		08/25/11 04:52	1
Toluene-d8 (Surr)	99		70 - 130		08/29/11 13:49	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Client Sample ID: GC-1A-S-3'

Date Collected: 08/23/11 14:50

Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-6

Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Acetone	ND		240		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Benzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Dichlorobromomethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Bromobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Chlorobromomethane	ND		96		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Bromoform	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Bromomethane	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
2-Butanone (MEK)	ND		240		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
n-Butylbenzene	880		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
tert-Butylbenzene	180		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Carbon disulfide	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Carbon tetrachloride	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Chlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Chloroethane	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Chloroform	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Chloromethane	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
2-Chlorotoluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
4-Chlorotoluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Chlorodibromomethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2-Dichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,3-Dichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,4-Dichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,3-Dichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1-Dichloropropene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2-Dibromo-3-Chloropropane	70		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Ethylene Dibromide	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Dibromomethane	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Dichlorodifluoromethane	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1-Dichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2-Dichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1-Dichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
cis-1,2-Dichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
trans-1,2-Dichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2-Dichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
cis-1,3-Dichloropropene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
trans-1,3-Dichloropropene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Ethylbenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Hexachlorobutadiene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
2-Hexanone	ND		240		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Isopropylbenzene	1200		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
4-Isopropyltoluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Methylene Chloride	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
4-Methyl-2-pentanone (MIBK)	ND		240		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Naphthalene	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Styrene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1,1,2-Tetrachloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1,2,2-Tetrachloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Tetrachloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Client Sample ID: GC-1A-S-3'
Date Collected: 08/23/11 14:50
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-6
Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Toluene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2,3-Trichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2,4-Trichlorobenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1,1-Trichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1,2-Trichloroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Trichloroethene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Trichlorofluoromethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2,3-Trichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,2,4-Trimethylbenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
1,3,5-Trimethylbenzene	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Vinyl acetate	ND		240		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Vinyl chloride	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Xylenes, Total	ND		48		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
2,2-Dichloropropane	ND		24		ug/Kg		08/24/11 14:13	08/25/11 04:35	1
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	0	X	45 - 131				08/24/11 14:13	08/25/11 04:35	1
1,2-Dichloroethane-d4 (Surr)	102		60 - 140				08/24/11 14:13	08/25/11 04:35	1
Toluene-d8 (Surr)	109		58 - 140				08/24/11 14:13	08/25/11 04:35	1

Client Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8015B - Diesel Range Organics (DRO) (GC)

Client Sample ID: GC-1-5'-3"
Date Collected: 08/23/11 11:15
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-2
Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Diesel Range Organics [C10-C28]	170		2.0		mg/Kg		08/25/11 09:07	08/26/11 12:16	2
Stoddard Solvent Range Organics (C9-C13)	210		2.0		mg/Kg		08/25/11 09:07	08/26/11 12:16	2
Motor Oil Range Organics [C24-C36]	ND		99		mg/Kg		08/25/11 09:07	08/26/11 12:16	2
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
p-Terphenyl	59		50 - 150				08/25/11 09:07	08/26/11 12:16	2

Client Sample ID: GC-1A-S-3'
Date Collected: 08/23/11 14:50
Date Received: 08/23/11 17:20

Lab Sample ID: 720-37099-6
Matrix: Solid

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Diesel Range Organics [C10-C28]	450		5.0		mg/Kg		08/25/11 09:07	08/26/11 12:40	5
Stoddard Solvent Range Organics (C9-C13)	610		5.0		mg/Kg		08/25/11 09:07	08/26/11 12:40	5
Motor Oil Range Organics [C24-C36]	ND		250		mg/Kg		08/25/11 09:07	08/26/11 12:40	5
Surrogate	% Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
p-Terphenyl	0	D	50 - 150				08/25/11 09:07	08/26/11 12:40	5

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS)

Lab Sample ID: MB 720-97869/1-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 97869

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Acetone	ND		50		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Benzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Dichlorobromomethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Bromobenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Chlorobromomethane	ND		20		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Bromoform	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Bromomethane	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
2-Butanone (MEK)	ND		50		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
n-Butylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
sec-Butylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
tert-Butylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Carbon disulfide	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Carbon tetrachloride	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Chlorobenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Chloroethane	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Chloroform	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Chloromethane	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
2-Chlorotoluene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
4-Chlorotoluene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Chlorodibromomethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2-Dichlorobenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,3-Dichlorobenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,4-Dichlorobenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,3-Dichloropropane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,1-Dichloropropene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2-Dibromo-3-Chloropropane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Ethylene Dibromide	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Dibromomethane	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Dichlorodifluoromethane	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,1-Dichloroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2-Dichloroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,1-Dichloroethene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
cis-1,2-Dichloroethene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
trans-1,2-Dichloroethene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2-Dichloropropane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
cis-1,3-Dichloropropene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
trans-1,3-Dichloropropene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Ethylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Hexachlorobutadiene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
2-Hexanone	ND		50		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Isopropylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
4-Isopropyltoluene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Methylene Chloride	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Naphthalene	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
N-Propylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Styrene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,1,1,2-Tetrachloroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 720-97869/1-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 97869

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
1,1,2,2-Tetrachloroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Tetrachloroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Toluene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2,3-Trichlorobenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2,4-Trichlorobenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,1,1-Trichloroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,1,2-Trichloroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Trichloroethene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Trichlorofluoromethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2,3-Trichloropropane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,2,4-Trimethylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
1,3,5-Trimethylbenzene	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Vinyl acetate	ND		50		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Vinyl chloride	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Xylenes, Total	ND		10		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
2,2-Dichloropropane	ND		5.0		ug/Kg		08/24/11 14:13	08/24/11 18:58	1
Gasoline Range Organics (GRO) -C5-C12	ND		250		ug/Kg		08/24/11 14:13	08/24/11 18:58	1

Surrogate	MB	MB	Limits	Prepared	Analyzed	Dil Fac
	% Recovery	Qualifier				
4-Bromofluorobenzene	103		45 - 131	08/24/11 14:13	08/24/11 18:58	1
1,2-Dichloroethane-d4 (Surr)	124		60 - 140	08/24/11 14:13	08/24/11 18:58	1
Toluene-d8 (Surr)	105		58 - 140	08/24/11 14:13	08/24/11 18:58	1

Lab Sample ID: LCS 720-97869/2-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 97869

Analyte	Spike Added	LCS	LCS	Unit	D	% Rec	% Rec. Limits
		Result	Qualifier				
Methyl tert-butyl ether	50.0	60.8		ug/Kg		122	71 - 144
Acetone	250	251		ug/Kg		101	30 - 162
Benzene	50.0	48.8		ug/Kg		98	82 - 124
Dichlorobromomethane	50.0	60.4		ug/Kg		121	86 - 131
Bromobenzene	50.0	52.8		ug/Kg		106	88 - 120
Chlorobromomethane	50.0	54.8		ug/Kg		110	81 - 116
Bromoform	50.0	66.4		ug/Kg		133	59 - 158
Bromomethane	50.0	49.4		ug/Kg		99	59 - 132
2-Butanone (MEK)	250	280		ug/Kg		112	61 - 150
n-Butylbenzene	50.0	54.4		ug/Kg		109	80 - 142
sec-Butylbenzene	50.0	53.0		ug/Kg		106	85 - 136
tert-Butylbenzene	50.0	54.0		ug/Kg		108	71 - 130
Carbon disulfide	50.0	48.6		ug/Kg		97	60 - 136
Carbon tetrachloride	50.0	58.0		ug/Kg		116	81 - 138
Chlorobenzene	50.0	51.2		ug/Kg		102	87 - 113
Chloroethane	50.0	49.8		ug/Kg		100	65 - 126
Chloroform	50.0	54.2		ug/Kg		108	77 - 127
Chloromethane	50.0	44.6		ug/Kg		89	60 - 149
2-Chlorotoluene	50.0	53.6		ug/Kg		107	80 - 138
4-Chlorotoluene	50.0	52.6		ug/Kg		105	79 - 136

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 720-97869/2-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 97869

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec.
							Limits
Chlorodibromomethane	50.0	58.8		ug/Kg		118	75 - 146
1,2-Dichlorobenzene	50.0	50.8		ug/Kg		102	84 - 130
1,3-Dichlorobenzene	50.0	52.2		ug/Kg		104	84 - 131
1,4-Dichlorobenzene	50.0	51.2		ug/Kg		102	85 - 125
1,3-Dichloropropane	50.0	57.6		ug/Kg		115	79 - 140
1,1-Dichloropropene	50.0	52.4		ug/Kg		105	70 - 130
1,2-Dibromo-3-Chloropropane	50.0	63.6		ug/Kg		127	68 - 145
Ethylene Dibromide	50.0	61.6		ug/Kg		123	79 - 140
Dibromomethane	50.0	58.2		ug/Kg		116	80 - 139
Dichlorodifluoromethane	50.0	50.0		ug/Kg		100	37 - 158
1,1-Dichloroethane	50.0	50.8		ug/Kg		102	85 - 124
1,2-Dichloroethane	50.0	58.4		ug/Kg		117	72 - 130
1,1-Dichloroethene	50.0	49.0		ug/Kg		98	76 - 122
cis-1,2-Dichloroethene	50.0	57.8		ug/Kg		116	87 - 138
trans-1,2-Dichloroethene	50.0	43.6		ug/Kg		87	67 - 108
1,2-Dichloropropane	50.0	50.2		ug/Kg		100	73 - 127
cis-1,3-Dichloropropene	50.0	59.6		ug/Kg		119	68 - 147
trans-1,3-Dichloropropene	50.0	67.6		ug/Kg		135	84 - 136
Ethylbenzene	50.0	52.4		ug/Kg		105	80 - 137
Hexachlorobutadiene	50.0	57.6		ug/Kg		115	72 - 132
2-Hexanone	250	292		ug/Kg		117	60 - 161
Isopropylbenzene	50.0	55.4		ug/Kg		111	88 - 128
4-Isopropyltoluene	50.0	53.6		ug/Kg		107	85 - 133
Methylene Chloride	50.0	51.0		ug/Kg		102	72 - 134
4-Methyl-2-pentanone (MIBK)	250	297		ug/Kg		119	69 - 160
Naphthalene	50.0	56.6		ug/Kg		113	70 - 147
N-Propylbenzene	50.0	50.8		ug/Kg		102	72 - 125
Styrene	50.0	56.0		ug/Kg		112	89 - 126
1,1,1,2-Tetrachloroethane	50.0	57.4		ug/Kg		115	90 - 130
1,1,1,2,2-Tetrachloroethane	50.0	53.0		ug/Kg		106	82 - 146
Tetrachloroethene	50.0	55.4		ug/Kg		111	78 - 132
Toluene	50.0	49.8		ug/Kg		100	83 - 128
1,2,3-Trichlorobenzene	50.0	55.0		ug/Kg		110	82 - 135
1,2,4-Trichlorobenzene	50.0	52.6		ug/Kg		105	70 - 131
1,1,1-Trichloroethane	50.0	55.4		ug/Kg		111	80 - 127
1,1,2-Trichloroethane	50.0	54.8		ug/Kg		110	82 - 125
Trichloroethene	50.0	51.8		ug/Kg		104	81 - 133
Trichlorofluoromethane	50.0	55.6		ug/Kg		111	71 - 139
1,2,3-Trichloropropane	50.0	57.6		ug/Kg		115	76 - 146
1,1,2-Trichloro-1,2,2-trifluoroethane	50.0	54.8		ug/Kg		110	70 - 130
1,2,4-Trimethylbenzene	50.0	52.8		ug/Kg		106	84 - 130
1,3,5-Trimethylbenzene	50.0	54.4		ug/Kg		109	82 - 131
Vinyl acetate	50.0	55.4		ug/Kg		111	38 - 176
Vinyl chloride	50.0	50.0		ug/Kg		100	58 - 125
m-Xylene & p-Xylene	100	104		ug/Kg		104	79 - 146
o-Xylene	50.0	55.2		ug/Kg		110	84 - 140
2,2-Dichloropropane	50.0	53.2		ug/Kg		106	73 - 162

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 720-97869/2-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 97869

Surrogate	LCS LCS		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	108		45 - 131
1,2-Dichloroethane-d4 (Surr)	121		60 - 140
Toluene-d8 (Surr)	107		58 - 140

Lab Sample ID: LCS 720-97869/4-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 97869

Analyte	Spike Added	LCS LCS		Unit	D	% Rec	% Rec. Limits
		Result	Qualifier				
Gasoline Range Organics (GRO) -C5-C12	1000	922		ug/Kg		92	61 - 128

Surrogate	LCS LCS		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	105		45 - 131
1,2-Dichloroethane-d4 (Surr)	118		60 - 140
Toluene-d8 (Surr)	105		58 - 140

Lab Sample ID: LCSD 720-97869/3-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 97869

Analyte	Spike Added	LCSD LCSD		Unit	D	% Rec	% Rec. Limits	RPD	
		Result	Qualifier					RPD	Limit
Methyl tert-butyl ether	50.0	61.4		ug/Kg		123	71 - 144	1	20
Acetone	250	266		ug/Kg		106	30 - 162	6	30
Benzene	50.0	48.4		ug/Kg		97	82 - 124	1	20
Dichlorobromomethane	50.0	60.8		ug/Kg		122	86 - 131	1	20
Bromobenzene	50.0	52.6		ug/Kg		105	88 - 120	0	20
Chlorobromomethane	50.0	54.2		ug/Kg		108	81 - 116	1	20
Bromoform	50.0	66.2		ug/Kg		132	59 - 158	0	20
Bromomethane	50.0	48.8		ug/Kg		98	59 - 132	1	20
2-Butanone (MEK)	250	293		ug/Kg		117	61 - 150	5	20
n-Butylbenzene	50.0	52.8		ug/Kg		106	80 - 142	3	20
sec-Butylbenzene	50.0	52.4		ug/Kg		105	85 - 136	1	20
tert-Butylbenzene	50.0	53.8		ug/Kg		108	71 - 130	0	20
Carbon disulfide	50.0	48.0		ug/Kg		96	60 - 136	1	20
Carbon tetrachloride	50.0	58.0		ug/Kg		116	81 - 138	0	20
Chlorobenzene	50.0	49.8		ug/Kg		100	87 - 113	3	20
Chloroethane	50.0	49.2		ug/Kg		98	65 - 126	1	20
Chloroform	50.0	53.4		ug/Kg		107	77 - 127	1	20
Chloromethane	50.0	45.2		ug/Kg		90	60 - 149	1	20
2-Chlorotoluene	50.0	51.8		ug/Kg		104	80 - 138	3	20
4-Chlorotoluene	50.0	51.4		ug/Kg		103	79 - 136	2	20
Chlorodibromomethane	50.0	59.6		ug/Kg		119	75 - 146	1	20
1,2-Dichlorobenzene	50.0	50.0		ug/Kg		100	84 - 130	2	20
1,3-Dichlorobenzene	50.0	51.0		ug/Kg		102	84 - 131	2	20
1,4-Dichlorobenzene	50.0	50.4		ug/Kg		101	85 - 125	2	20
1,3-Dichloropropane	50.0	58.8		ug/Kg		118	79 - 140	2	20
1,1-Dichloropropene	50.0	51.8		ug/Kg		104	70 - 130	1	20
1,2-Dibromo-3-Chloropropane	50.0	63.4		ug/Kg		127	68 - 145	0	20

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 720-97869/3-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 97869

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec.		RPD	Limit
							Limits	RPD		
Ethylene Dibromide	50.0	63.0		ug/Kg		126	79 - 140	2	20	
Dibromomethane	50.0	57.8		ug/Kg		116	80 - 139	1	20	
Dichlorodifluoromethane	50.0	50.2		ug/Kg		100	37 - 158	0	20	
1,1-Dichloroethane	50.0	49.6		ug/Kg		99	85 - 124	2	20	
1,2-Dichloroethane	50.0	56.8		ug/Kg		114	72 - 130	3	20	
1,1-Dichloroethene	50.0	48.2		ug/Kg		96	76 - 122	2	20	
cis-1,2-Dichloroethene	50.0	56.8		ug/Kg		114	87 - 138	2	20	
trans-1,2-Dichloroethene	50.0	43.8		ug/Kg		88	67 - 108	0	20	
1,2-Dichloropropane	50.0	49.4		ug/Kg		99	73 - 127	2	20	
cis-1,3-Dichloropropene	50.0	59.0		ug/Kg		118	68 - 147	1	20	
trans-1,3-Dichloropropene	50.0	66.8		ug/Kg		134	84 - 136	1	20	
Ethylbenzene	50.0	51.4		ug/Kg		103	80 - 137	2	20	
Hexachlorobutadiene	50.0	54.8		ug/Kg		110	72 - 132	5	20	
2-Hexanone	250	307		ug/Kg		123	60 - 161	5	20	
Isopropylbenzene	50.0	54.6		ug/Kg		109	88 - 128	1	20	
4-Isopropyltoluene	50.0	53.0		ug/Kg		106	85 - 133	1	20	
Methylene Chloride	50.0	49.4		ug/Kg		99	72 - 134	3	20	
4-Methyl-2-pentanone (MIBK)	250	308		ug/Kg		123	69 - 160	4	20	
Naphthalene	50.0	56.2		ug/Kg		112	70 - 147	1	20	
N-Propylbenzene	50.0	50.4		ug/Kg		101	72 - 125	1	20	
Styrene	50.0	54.8		ug/Kg		110	89 - 126	2	20	
1,1,1,2-Tetrachloroethane	50.0	55.6		ug/Kg		111	90 - 130	3	20	
1,1,1,2,2-Tetrachloroethane	50.0	53.4		ug/Kg		107	82 - 146	1	20	
Tetrachloroethene	50.0	56.6		ug/Kg		113	78 - 132	2	20	
Toluene	50.0	48.6		ug/Kg		97	83 - 128	2	20	
1,2,3-Trichlorobenzene	50.0	53.8		ug/Kg		108	82 - 135	2	20	
1,2,4-Trichlorobenzene	50.0	50.8		ug/Kg		102	70 - 131	3	20	
1,1,1-Trichloroethane	50.0	54.2		ug/Kg		108	80 - 127	2	20	
1,1,2-Trichloroethane	50.0	57.8		ug/Kg		116	82 - 125	5	20	
Trichloroethene	50.0	51.8		ug/Kg		104	81 - 133	0	20	
Trichlorofluoromethane	50.0	54.6		ug/Kg		109	71 - 139	2	20	
1,2,3-Trichloropropane	50.0	57.4		ug/Kg		115	76 - 146	0	20	
1,1,2-Trichloro-1,2,2-trifluoroethane	50.0	54.8		ug/Kg		110	70 - 130	0	20	
1,2,4-Trimethylbenzene	50.0	51.6		ug/Kg		103	84 - 130	2	20	
1,3,5-Trimethylbenzene	50.0	54.0		ug/Kg		108	82 - 131	1	20	
Vinyl acetate	50.0	56.2		ug/Kg		112	38 - 176	1	20	
Vinyl chloride	50.0	50.6		ug/Kg		101	58 - 125	1	20	
m-Xylene & p-Xylene	100	102		ug/Kg		102	79 - 146	3	20	
o-Xylene	50.0	54.0		ug/Kg		108	84 - 140	2	20	
2,2-Dichloropropane	50.0	54.4		ug/Kg		109	73 - 162	2	20	

Surrogate	LCSD LCSD		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	104		45 - 131
1,2-Dichloroethane-d4 (Surr)	120		60 - 140
Toluene-d8 (Surr)	108		58 - 140

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 720-97869/5-A

Matrix: Solid

Analysis Batch: 97875

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 97869

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec. Limits	RPD	RPD Limit
Gasoline Range Organics (GRO) -C5-C12	1000	952		ug/Kg		95	61 - 128	3	20

Surrogate	LCSD % Recovery	LCSD Qualifier	LCSD Limits
4-Bromofluorobenzene	104		45 - 131
1,2-Dichloroethane-d4 (Surr)	123		60 - 140
Toluene-d8 (Surr)	109		58 - 140

Lab Sample ID: MB 720-97872/4

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Methyl tert-butyl ether	ND		0.50		ug/L			08/24/11 19:43	1
Acetone	ND		50		ug/L			08/24/11 19:43	1
Benzene	ND		0.50		ug/L			08/24/11 19:43	1
Dichlorobromomethane	ND		0.50		ug/L			08/24/11 19:43	1
Bromobenzene	ND		1.0		ug/L			08/24/11 19:43	1
Chlorobromomethane	ND		1.0		ug/L			08/24/11 19:43	1
Bromoform	ND		1.0		ug/L			08/24/11 19:43	1
Bromomethane	ND		1.0		ug/L			08/24/11 19:43	1
2-Butanone (MEK)	ND		50		ug/L			08/24/11 19:43	1
n-Butylbenzene	ND		1.0		ug/L			08/24/11 19:43	1
sec-Butylbenzene	ND		1.0		ug/L			08/24/11 19:43	1
tert-Butylbenzene	ND		1.0		ug/L			08/24/11 19:43	1
Carbon disulfide	ND		5.0		ug/L			08/24/11 19:43	1
Carbon tetrachloride	ND		0.50		ug/L			08/24/11 19:43	1
Chlorobenzene	ND		0.50		ug/L			08/24/11 19:43	1
Chloroethane	ND		1.0		ug/L			08/24/11 19:43	1
Chloroform	ND		1.0		ug/L			08/24/11 19:43	1
Chloromethane	ND		1.0		ug/L			08/24/11 19:43	1
2-Chlorotoluene	ND		0.50		ug/L			08/24/11 19:43	1
4-Chlorotoluene	ND		0.50		ug/L			08/24/11 19:43	1
Chlorodibromomethane	ND		0.50		ug/L			08/24/11 19:43	1
1,2-Dichlorobenzene	ND		0.50		ug/L			08/24/11 19:43	1
1,3-Dichlorobenzene	ND		0.50		ug/L			08/24/11 19:43	1
1,4-Dichlorobenzene	ND		0.50		ug/L			08/24/11 19:43	1
1,3-Dichloropropane	ND		1.0		ug/L			08/24/11 19:43	1
1,1-Dichloropropene	ND		0.50		ug/L			08/24/11 19:43	1
1,2-Dibromo-3-Chloropropane	ND		1.0		ug/L			08/24/11 19:43	1
Ethylene Dibromide	ND		0.50		ug/L			08/24/11 19:43	1
Dibromomethane	ND		0.50		ug/L			08/24/11 19:43	1
Dichlorodifluoromethane	ND		0.50		ug/L			08/24/11 19:43	1
1,1-Dichloroethane	ND		0.50		ug/L			08/24/11 19:43	1
1,2-Dichloroethane	ND		0.50		ug/L			08/24/11 19:43	1
1,1-Dichloroethene	ND		0.50		ug/L			08/24/11 19:43	1
cis-1,2-Dichloroethene	ND		0.50		ug/L			08/24/11 19:43	1
trans-1,2-Dichloroethene	ND		0.50		ug/L			08/24/11 19:43	1
1,2-Dichloropropane	ND		0.50		ug/L			08/24/11 19:43	1

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 720-97872/4

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
cis-1,3-Dichloropropene	ND		0.50		ug/L			08/24/11 19:43	1
trans-1,3-Dichloropropene	ND		0.50		ug/L			08/24/11 19:43	1
Ethylbenzene	ND		0.50		ug/L			08/24/11 19:43	1
Hexachlorobutadiene	ND		1.0		ug/L			08/24/11 19:43	1
2-Hexanone	ND		50		ug/L			08/24/11 19:43	1
Isopropylbenzene	ND		0.50		ug/L			08/24/11 19:43	1
4-Isopropyltoluene	ND		1.0		ug/L			08/24/11 19:43	1
Methylene Chloride	ND		5.0		ug/L			08/24/11 19:43	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/L			08/24/11 19:43	1
Naphthalene	ND		1.0		ug/L			08/24/11 19:43	1
N-Propylbenzene	ND		1.0		ug/L			08/24/11 19:43	1
Styrene	ND		0.50		ug/L			08/24/11 19:43	1
1,1,1,2-Tetrachloroethane	ND		0.50		ug/L			08/24/11 19:43	1
1,1,2,2-Tetrachloroethane	ND		0.50		ug/L			08/24/11 19:43	1
Tetrachloroethene	ND		0.50		ug/L			08/24/11 19:43	1
Toluene	ND		0.50		ug/L			08/24/11 19:43	1
1,2,3-Trichlorobenzene	ND		1.0		ug/L			08/24/11 19:43	1
1,2,4-Trichlorobenzene	ND		1.0		ug/L			08/24/11 19:43	1
1,1,1-Trichloroethane	ND		0.50		ug/L			08/24/11 19:43	1
1,1,2-Trichloroethane	ND		0.50		ug/L			08/24/11 19:43	1
Trichloroethene	ND		0.50		ug/L			08/24/11 19:43	1
Trichlorofluoromethane	ND		1.0		ug/L			08/24/11 19:43	1
1,2,3-Trichloropropane	ND		0.50		ug/L			08/24/11 19:43	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		0.50		ug/L			08/24/11 19:43	1
1,2,4-Trimethylbenzene	ND		0.50		ug/L			08/24/11 19:43	1
1,3,5-Trimethylbenzene	ND		0.50		ug/L			08/24/11 19:43	1
Vinyl acetate	ND		10		ug/L			08/24/11 19:43	1
Vinyl chloride	ND		0.50		ug/L			08/24/11 19:43	1
Xylenes, Total	ND		1.0		ug/L			08/24/11 19:43	1
2,2-Dichloropropane	ND		0.50		ug/L			08/24/11 19:43	1
Gasoline Range Organics (GRO) -C5-C12	ND		50		ug/L			08/24/11 19:43	1

Surrogate	MB	MB	Limits	Prepared	Analyzed	Dil Fac
	% Recovery	Qualifier				
4-Bromofluorobenzene	93		67 - 130		08/24/11 19:43	1
1,2-Dichloroethane-d4 (Surr)	87		67 - 130		08/24/11 19:43	1
Toluene-d8 (Surr)	99		70 - 130		08/24/11 19:43	1

Lab Sample ID: LCS 720-97872/5

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits
Acetone	125	90.2		ug/L		72	26 - 180
Benzene	25.0	27.4		ug/L		110	82 - 127
Dichlorobromomethane	25.0	26.4		ug/L		106	70 - 130
Bromobenzene	25.0	28.2		ug/L		113	79 - 127
Chlorobromomethane	25.0	26.9		ug/L		108	70 - 130
Bromoform	25.0	27.6		ug/L		110	68 - 136

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 720-97872/5

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec.
							Limits
Bromomethane	25.0	20.9		ug/L		84	43 - 151
2-Butanone (MEK)	125	114		ug/L		91	66 - 149
n-Butylbenzene	25.0	30.3		ug/L		121	79 - 142
sec-Butylbenzene	25.0	30.5		ug/L		122	81 - 134
tert-Butylbenzene	25.0	29.9		ug/L		120	82 - 135
Carbon disulfide	25.0	29.0		ug/L		116	58 - 124
Carbon tetrachloride	25.0	25.9		ug/L		104	77 - 146
Chlorobenzene	25.0	26.7		ug/L		107	70 - 130
Chloroethane	25.0	22.3		ug/L		89	62 - 138
Chloroform	25.0	24.9		ug/L		100	70 - 130
Chloromethane	25.0	21.6		ug/L		86	52 - 175
2-Chlorotoluene	25.0	28.3		ug/L		113	70 - 130
4-Chlorotoluene	25.0	27.7		ug/L		111	70 - 130
Chlorodibromomethane	25.0	27.1		ug/L		108	78 - 145
1,2-Dichlorobenzene	25.0	27.1		ug/L		108	70 - 130
1,3-Dichlorobenzene	25.0	27.8		ug/L		111	70 - 130
1,4-Dichlorobenzene	25.0	27.2		ug/L		109	87 - 118
1,3-Dichloropropane	25.0	26.7		ug/L		107	82 - 128
1,1-Dichloropropene	25.0	29.2		ug/L		117	70 - 130
1,2-Dibromo-3-Chloropropane	25.0	29.1		ug/L		116	72 - 136
Ethylene Dibromide	25.0	28.8		ug/L		115	70 - 130
Dibromomethane	25.0	26.2		ug/L		105	70 - 130
Dichlorodifluoromethane	25.0	20.5		ug/L		82	33 - 125
1,1-Dichloroethane	25.0	25.9		ug/L		104	70 - 130
1,2-Dichloroethane	25.0	23.5		ug/L		94	70 - 126
1,1-Dichloroethene	25.0	25.4		ug/L		102	64 - 128
cis-1,2-Dichloroethene	25.0	29.3		ug/L		117	70 - 130
trans-1,2-Dichloroethene	25.0	23.8		ug/L		95	68 - 118
1,2-Dichloropropane	25.0	26.8		ug/L		107	70 - 130
cis-1,3-Dichloropropene	25.0	25.1		ug/L		100	88 - 137
trans-1,3-Dichloropropene	25.0	26.9		ug/L		108	83 - 140
Ethylbenzene	25.0	27.4		ug/L		110	86 - 135
Hexachlorobutadiene	25.0	28.0		ug/L		112	70 - 130
2-Hexanone	125	121		ug/L		96	60 - 164
Isopropylbenzene	25.0	31.3		ug/L		125	70 - 130
4-Isopropyltoluene	25.0	29.3		ug/L		117	70 - 130
Methylene Chloride	25.0	24.7		ug/L		99	73 - 147
4-Methyl-2-pentanone (MIBK)	125	130		ug/L		104	63 - 165
Naphthalene	25.0	27.8		ug/L		111	78 - 135
N-Propylbenzene	25.0	29.9		ug/L		120	70 - 130
Styrene	25.0	28.1		ug/L		112	70 - 130
1,1,1,2-Tetrachloroethane	25.0	27.7		ug/L		111	70 - 130
1,1,2,2-Tetrachloroethane	25.0	26.9		ug/L		108	70 - 130
Tetrachloroethene	25.0	29.6		ug/L		118	70 - 130
Toluene	25.0	27.3		ug/L		109	83 - 129
1,2,3-Trichlorobenzene	25.0	28.4		ug/L		114	70 - 130
1,2,4-Trichlorobenzene	25.0	29.1		ug/L		116	70 - 130
1,1,1-Trichloroethane	25.0	25.9		ug/L		104	70 - 130
1,1,2-Trichloroethane	25.0	26.7		ug/L		107	82 - 128
Trichloroethene	25.0	27.8		ug/L		111	70 - 130

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 720-97872/5

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec.	
							Limits	
Trichlorofluoromethane	25.0	21.9		ug/L		88	66 - 132	
1,2,3-Trichloropropane	25.0	27.2		ug/L		109	70 - 130	
1,1,2-Trichloro-1,2,2-trifluoroethane	25.0	27.7		ug/L		111	42 - 162	
1,2,4-Trimethylbenzene	25.0	29.2		ug/L		117	70 - 132	
1,3,5-Trimethylbenzene	25.0	30.1		ug/L		120	70 - 130	
Vinyl acetate	25.0	23.9		ug/L		96	43 - 163	
Vinyl chloride	25.0	20.7		ug/L		83	63 - 125	
2,2-Dichloropropane	25.0	27.5		ug/L		110	70 - 140	

Surrogate	LCS LCS		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	100		67 - 130
1,2-Dichloroethane-d4 (Surr)	87		67 - 130
Toluene-d8 (Surr)	104		70 - 130

Lab Sample ID: LCS 720-97872/7

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec.	
							Limits	
Gasoline Range Organics (GRO) -C5-C12	500	396		ug/L		79	62 - 117	

Surrogate	LCS LCS		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	100		67 - 130
1,2-Dichloroethane-d4 (Surr)	87		67 - 130
Toluene-d8 (Surr)	105		70 - 130

Lab Sample ID: LCSD 720-97872/6

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec.		RPD	
							Limits		RPD	Limit
Methyl tert-butyl ether	25.0	27.8		ug/L		111	62 - 130	1	20	
Acetone	125	85.7		ug/L		69	26 - 180	5	30	
Benzene	25.0	27.7		ug/L		111	82 - 127	1	20	
Dichlorobromomethane	25.0	26.4		ug/L		106	70 - 130	0	20	
Bromobenzene	25.0	28.9		ug/L		116	79 - 127	2	20	
Chlorobromomethane	25.0	27.0		ug/L		108	70 - 130	0	20	
Bromoform	25.0	27.6		ug/L		110	68 - 136	0	20	
Bromomethane	25.0	21.2		ug/L		85	43 - 151	1	20	
2-Butanone (MEK)	125	109		ug/L		87	66 - 149	4	20	
n-Butylbenzene	25.0	29.8		ug/L		119	79 - 142	2	20	
sec-Butylbenzene	25.0	30.9		ug/L		124	81 - 134	1	20	
tert-Butylbenzene	25.0	30.6		ug/L		122	82 - 135	2	20	
Carbon disulfide	25.0	29.4		ug/L		118	58 - 124	1	20	
Carbon tetrachloride	25.0	25.7		ug/L		103	77 - 146	1	20	
Chlorobenzene	25.0	27.1		ug/L		108	70 - 130	1	20	
Chloroethane	25.0	22.7		ug/L		91	62 - 138	2	20	
Chloroform	25.0	25.1		ug/L		100	70 - 130	1	20	

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 720-97872/6

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec.		RPD	Limit
							Limits	RPD		
Chloromethane	25.0	22.2		ug/L		89	52 - 175	3	20	
2-Chlorotoluene	25.0	28.7		ug/L		115	70 - 130	1	20	
4-Chlorotoluene	25.0	28.0		ug/L		112	70 - 130	1	20	
Chlorodibromomethane	25.0	27.0		ug/L		108	78 - 145	0	20	
1,2-Dichlorobenzene	25.0	27.3		ug/L		109	70 - 130	1	20	
1,3-Dichlorobenzene	25.0	28.1		ug/L		112	70 - 130	1	20	
1,4-Dichlorobenzene	25.0	27.1		ug/L		108	87 - 118	0	20	
1,3-Dichloropropane	25.0	26.6		ug/L		106	82 - 128	0	20	
1,1-Dichloropropene	25.0	29.3		ug/L		117	70 - 130	0	20	
1,2-Dibromo-3-Chloropropane	25.0	29.2		ug/L		117	72 - 136	0	20	
Ethylene Dibromide	25.0	28.5		ug/L		114	70 - 130	1	20	
Dibromomethane	25.0	26.3		ug/L		105	70 - 130	0	20	
Dichlorodifluoromethane	25.0	20.5		ug/L		82	33 - 125	0	20	
1,1-Dichloroethane	25.0	26.3		ug/L		105	70 - 130	2	20	
1,2-Dichloroethane	25.0	23.6		ug/L		94	70 - 126	0	20	
1,1-Dichloroethene	25.0	26.0		ug/L		104	64 - 128	2	20	
cis-1,2-Dichloroethene	25.0	29.8		ug/L		119	70 - 130	2	20	
trans-1,2-Dichloroethene	25.0	24.1		ug/L		96	68 - 118	1	20	
1,2-Dichloropropane	25.0	27.1		ug/L		108	70 - 130	1	20	
cis-1,3-Dichloropropene	25.0	25.2		ug/L		101	88 - 137	0	20	
trans-1,3-Dichloropropene	25.0	26.9		ug/L		108	83 - 140	0	20	
Ethylbenzene	25.0	27.6		ug/L		110	86 - 135	1	20	
Hexachlorobutadiene	25.0	27.6		ug/L		110	70 - 130	1	20	
2-Hexanone	125	117		ug/L		93	60 - 164	3	20	
Isopropylbenzene	25.0	31.5		ug/L		126	70 - 130	1	20	
4-Isopropyltoluene	25.0	29.5		ug/L		118	70 - 130	1	20	
Methylene Chloride	25.0	25.2		ug/L		101	73 - 147	2	20	
4-Methyl-2-pentanone (MIBK)	125	126		ug/L		101	63 - 165	3	20	
Naphthalene	25.0	27.7		ug/L		111	78 - 135	0	20	
N-Propylbenzene	25.0	30.2		ug/L		121	70 - 130	1	20	
Styrene	25.0	28.5		ug/L		114	70 - 130	1	20	
1,1,1,2-Tetrachloroethane	25.0	28.3		ug/L		113	70 - 130	2	20	
1,1,1,2,2-Tetrachloroethane	25.0	27.3		ug/L		109	70 - 130	1	20	
Tetrachloroethene	25.0	29.1		ug/L		116	70 - 130	2	20	
Toluene	25.0	27.7		ug/L		111	83 - 129	1	20	
1,2,3-Trichlorobenzene	25.0	28.2		ug/L		113	70 - 130	1	20	
1,2,4-Trichlorobenzene	25.0	28.2		ug/L		113	70 - 130	3	20	
1,1,1-Trichloroethane	25.0	25.8		ug/L		103	70 - 130	0	20	
1,1,2-Trichloroethane	25.0	26.8		ug/L		107	82 - 128	0	20	
Trichloroethene	25.0	27.7		ug/L		111	70 - 130	0	20	
Trichlorofluoromethane	25.0	21.9		ug/L		88	66 - 132	0	20	
1,2,3-Trichloropropane	25.0	27.5		ug/L		110	70 - 130	1	20	
1,1,2-Trichloro-1,2,2-trifluoroethane	25.0	27.9		ug/L		112	42 - 162	1	20	
1,2,4-Trimethylbenzene	25.0	29.3		ug/L		117	70 - 132	0	20	
1,3,5-Trimethylbenzene	25.0	30.3		ug/L		121	70 - 130	1	20	
Vinyl acetate	25.0	24.0		ug/L		96	43 - 163	0	20	
Vinyl chloride	25.0	21.1		ug/L		84	63 - 125	2	20	
2,2-Dichloropropane	25.0	27.0		ug/L		108	70 - 140	2	20	

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 720-97872/6

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Surrogate	LCSD		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	99		67 - 130
1,2-Dichloroethane-d4 (Surr)	86		67 - 130
Toluene-d8 (Surr)	104		70 - 130

Lab Sample ID: LCSD 720-97872/8

Matrix: Water

Analysis Batch: 97872

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD		Unit	D	% Rec	% Rec. Limits	RPD	RPD Limit
		Result	Qualifier						
Gasoline Range Organics (GRO) -C5-C12	500	397		ug/L		79	62 - 117	0	20

Surrogate	LCSD		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	102		67 - 130
1,2-Dichloroethane-d4 (Surr)	88		67 - 130
Toluene-d8 (Surr)	105		70 - 130

Lab Sample ID: MB 720-97897/4

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Methyl tert-butyl ether	ND		0.50		ug/L			08/25/11 10:39	1
Acetone	ND		50		ug/L			08/25/11 10:39	1
Benzene	ND		0.50		ug/L			08/25/11 10:39	1
Dichlorobromomethane	ND		0.50		ug/L			08/25/11 10:39	1
Bromobenzene	ND		1.0		ug/L			08/25/11 10:39	1
Chlorobromomethane	ND		1.0		ug/L			08/25/11 10:39	1
Bromoform	ND		1.0		ug/L			08/25/11 10:39	1
Bromomethane	ND		1.0		ug/L			08/25/11 10:39	1
2-Butanone (MEK)	ND		50		ug/L			08/25/11 10:39	1
n-Butylbenzene	ND		1.0		ug/L			08/25/11 10:39	1
sec-Butylbenzene	ND		1.0		ug/L			08/25/11 10:39	1
tert-Butylbenzene	ND		1.0		ug/L			08/25/11 10:39	1
Carbon disulfide	ND		5.0		ug/L			08/25/11 10:39	1
Carbon tetrachloride	ND		0.50		ug/L			08/25/11 10:39	1
Chlorobenzene	ND		0.50		ug/L			08/25/11 10:39	1
Chloroethane	ND		1.0		ug/L			08/25/11 10:39	1
Chloroform	ND		1.0		ug/L			08/25/11 10:39	1
Chloromethane	ND		1.0		ug/L			08/25/11 10:39	1
2-Chlorotoluene	ND		0.50		ug/L			08/25/11 10:39	1
4-Chlorotoluene	ND		0.50		ug/L			08/25/11 10:39	1
Chlorodibromomethane	ND		0.50		ug/L			08/25/11 10:39	1
1,2-Dichlorobenzene	ND		0.50		ug/L			08/25/11 10:39	1
1,3-Dichlorobenzene	ND		0.50		ug/L			08/25/11 10:39	1
1,4-Dichlorobenzene	ND		0.50		ug/L			08/25/11 10:39	1
1,3-Dichloropropane	ND		1.0		ug/L			08/25/11 10:39	1
1,1-Dichloropropene	ND		0.50		ug/L			08/25/11 10:39	1
1,2-Dibromo-3-Chloropropane	ND		1.0		ug/L			08/25/11 10:39	1

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 720-97897/4

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Ethylene Dibromide	ND		0.50		ug/L			08/25/11 10:39	1
Dibromomethane	ND		0.50		ug/L			08/25/11 10:39	1
Dichlorodifluoromethane	ND		0.50		ug/L			08/25/11 10:39	1
1,1-Dichloroethane	ND		0.50		ug/L			08/25/11 10:39	1
1,2-Dichloroethane	ND		0.50		ug/L			08/25/11 10:39	1
1,1-Dichloroethene	ND		0.50		ug/L			08/25/11 10:39	1
cis-1,2-Dichloroethene	ND		0.50		ug/L			08/25/11 10:39	1
trans-1,2-Dichloroethene	ND		0.50		ug/L			08/25/11 10:39	1
1,2-Dichloropropane	ND		0.50		ug/L			08/25/11 10:39	1
cis-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 10:39	1
trans-1,3-Dichloropropene	ND		0.50		ug/L			08/25/11 10:39	1
Ethylbenzene	ND		0.50		ug/L			08/25/11 10:39	1
Hexachlorobutadiene	ND		1.0		ug/L			08/25/11 10:39	1
2-Hexanone	ND		50		ug/L			08/25/11 10:39	1
Isopropylbenzene	ND		0.50		ug/L			08/25/11 10:39	1
4-Isopropyltoluene	ND		1.0		ug/L			08/25/11 10:39	1
Methylene Chloride	ND		5.0		ug/L			08/25/11 10:39	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/L			08/25/11 10:39	1
Naphthalene	ND		1.0		ug/L			08/25/11 10:39	1
N-Propylbenzene	ND		1.0		ug/L			08/25/11 10:39	1
Styrene	ND		0.50		ug/L			08/25/11 10:39	1
1,1,1,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 10:39	1
1,1,2,2-Tetrachloroethane	ND		0.50		ug/L			08/25/11 10:39	1
Tetrachloroethene	ND		0.50		ug/L			08/25/11 10:39	1
Toluene	ND		0.50		ug/L			08/25/11 10:39	1
1,2,3-Trichlorobenzene	ND		1.0		ug/L			08/25/11 10:39	1
1,2,4-Trichlorobenzene	ND		1.0		ug/L			08/25/11 10:39	1
1,1,1-Trichloroethane	ND		0.50		ug/L			08/25/11 10:39	1
1,1,2-Trichloroethane	ND		0.50		ug/L			08/25/11 10:39	1
Trichloroethene	ND		0.50		ug/L			08/25/11 10:39	1
Trichlorofluoromethane	ND		1.0		ug/L			08/25/11 10:39	1
1,2,3-Trichloropropane	ND		0.50		ug/L			08/25/11 10:39	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		0.50		ug/L			08/25/11 10:39	1
1,2,4-Trimethylbenzene	ND		0.50		ug/L			08/25/11 10:39	1
1,3,5-Trimethylbenzene	ND		0.50		ug/L			08/25/11 10:39	1
Vinyl acetate	ND		10		ug/L			08/25/11 10:39	1
Vinyl chloride	ND		0.50		ug/L			08/25/11 10:39	1
Xylenes, Total	ND		1.0		ug/L			08/25/11 10:39	1
2,2-Dichloropropane	ND		0.50		ug/L			08/25/11 10:39	1
Gasoline Range Organics (GRO) -C5-C12	ND		50		ug/L			08/25/11 10:39	1

Surrogate	MB	MB	Limits	Prepared	Analyzed	Dil Fac
	% Recovery	Qualifier				
4-Bromofluorobenzene	98		67 - 130		08/25/11 10:39	1
1,2-Dichloroethane-d4 (Surr)	88		67 - 130		08/25/11 10:39	1
Toluene-d8 (Surr)	100		70 - 130		08/25/11 10:39	1

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 720-97897/5

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits
Methyl tert-butyl ether	25.0	27.7		ug/L		111	62 - 130
Acetone	125	92.1		ug/L		74	26 - 180
Benzene	25.0	26.7		ug/L		107	82 - 127
Dichlorobromomethane	25.0	26.1		ug/L		104	70 - 130
Bromobenzene	25.0	28.6		ug/L		114	79 - 127
Chlorobromomethane	25.0	26.2		ug/L		105	70 - 130
Bromoform	25.0	29.3		ug/L		117	68 - 136
Bromomethane	25.0	20.3		ug/L		81	43 - 151
2-Butanone (MEK)	125	112		ug/L		89	66 - 149
n-Butylbenzene	25.0	30.5		ug/L		122	79 - 142
sec-Butylbenzene	25.0	30.4		ug/L		122	81 - 134
tert-Butylbenzene	25.0	30.0		ug/L		120	82 - 135
Carbon disulfide	25.0	28.0		ug/L		112	58 - 124
Carbon tetrachloride	25.0	24.8		ug/L		99	77 - 146
Chlorobenzene	25.0	26.6		ug/L		106	70 - 130
Chloroethane	25.0	22.1		ug/L		88	62 - 138
Chloroform	25.0	24.2		ug/L		97	70 - 130
Chloromethane	25.0	21.7		ug/L		87	52 - 175
2-Chlorotoluene	25.0	28.2		ug/L		113	70 - 130
4-Chlorotoluene	25.0	27.9		ug/L		112	70 - 130
Chlorodibromomethane	25.0	27.7		ug/L		111	78 - 145
1,2-Dichlorobenzene	25.0	28.0		ug/L		112	70 - 130
1,3-Dichlorobenzene	25.0	28.5		ug/L		114	70 - 130
1,4-Dichlorobenzene	25.0	27.9		ug/L		112	87 - 118
1,3-Dichloropropane	25.0	26.4		ug/L		106	82 - 128
1,1-Dichloropropene	25.0	28.1		ug/L		112	70 - 130
1,2-Dibromo-3-Chloropropane	25.0	30.3		ug/L		121	72 - 136
Ethylene Dibromide	25.0	28.3		ug/L		113	70 - 130
Dibromomethane	25.0	25.7		ug/L		103	70 - 130
Dichlorodifluoromethane	25.0	19.4		ug/L		78	33 - 125
1,1-Dichloroethane	25.0	25.4		ug/L		102	70 - 130
1,2-Dichloroethane	25.0	22.8		ug/L		91	70 - 126
1,1-Dichloroethene	25.0	24.8		ug/L		99	64 - 128
cis-1,2-Dichloroethene	25.0	28.7		ug/L		115	70 - 130
trans-1,2-Dichloroethene	25.0	23.0		ug/L		92	68 - 118
1,2-Dichloropropane	25.0	26.5		ug/L		106	70 - 130
cis-1,3-Dichloropropene	25.0	25.2		ug/L		101	88 - 137
trans-1,3-Dichloropropene	25.0	27.3		ug/L		109	83 - 140
Ethylbenzene	25.0	26.7		ug/L		107	86 - 135
Hexachlorobutadiene	25.0	29.0		ug/L		116	70 - 130
2-Hexanone	125	123		ug/L		98	60 - 164
Isopropylbenzene	25.0	31.0		ug/L		124	70 - 130
4-Isopropyltoluene	25.0	29.4		ug/L		118	70 - 130
Methylene Chloride	25.0	24.3		ug/L		97	73 - 147
4-Methyl-2-pentanone (MIBK)	125	129		ug/L		104	63 - 165
Naphthalene	25.0	28.7		ug/L		115	78 - 135
N-Propylbenzene	25.0	29.4		ug/L		118	70 - 130
Styrene	25.0	28.6		ug/L		114	70 - 130
1,1,1,2-Tetrachloroethane	25.0	28.3		ug/L		113	70 - 130

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 720-97897/5

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits	
1,1,2,2-Tetrachloroethane	25.0	27.5		ug/L		110	70 - 130	
Tetrachloroethene	25.0	28.1		ug/L		112	70 - 130	
Toluene	25.0	26.4		ug/L		106	83 - 129	
1,2,3-Trichlorobenzene	25.0	30.0		ug/L		120	70 - 130	
1,2,4-Trichlorobenzene	25.0	30.6		ug/L		122	70 - 130	
1,1,1-Trichloroethane	25.0	25.0		ug/L		100	70 - 130	
1,1,2-Trichloroethane	25.0	27.2		ug/L		109	82 - 128	
Trichloroethene	25.0	26.7		ug/L		107	70 - 130	
Trichlorofluoromethane	25.0	21.9		ug/L		88	66 - 132	
1,2,3-Trichloropropane	25.0	27.4		ug/L		110	70 - 130	
1,1,2-Trichloro-1,2,2-trifluoroethane	25.0	26.7		ug/L		107	42 - 162	
1,2,4-Trimethylbenzene	25.0	29.3		ug/L		117	70 - 132	
1,3,5-Trimethylbenzene	25.0	29.8		ug/L		119	70 - 130	
Vinyl acetate	25.0	23.2		ug/L		93	43 - 163	
Vinyl chloride	25.0	20.2		ug/L		81	63 - 125	
2,2-Dichloropropane	25.0	27.0		ug/L		108	70 - 140	

Surrogate	LCS LCS		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	100		67 - 130
1,2-Dichloroethane-d4 (Surr)	88		67 - 130
Toluene-d8 (Surr)	105		70 - 130

Lab Sample ID: LCS 720-97897/7

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits	
Gasoline Range Organics (GRO) -C5-C12	500	410		ug/L		82	62 - 117	

Surrogate	LCS LCS		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	103		67 - 130
1,2-Dichloroethane-d4 (Surr)	90		67 - 130
Toluene-d8 (Surr)	105		70 - 130

Lab Sample ID: LCSD 720-97897/6

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec. Limits		RPD	Limit
Methyl tert-butyl ether	25.0	28.9		ug/L		116	62 - 130	4	20	
Acetone	125	100		ug/L		80	26 - 180	8	30	
Benzene	25.0	27.5		ug/L		110	82 - 127	3	20	
Dichlorobromomethane	25.0	27.5		ug/L		110	70 - 130	5	20	
Bromobenzene	25.0	29.9		ug/L		120	79 - 127	4	20	
Chlorobromomethane	25.0	27.1		ug/L		108	70 - 130	3	20	
Bromoform	25.0	30.1		ug/L		120	68 - 136	3	20	
Bromomethane	25.0	20.7		ug/L		83	43 - 151	2	20	
2-Butanone (MEK)	125	120		ug/L		96	66 - 149	7	20	

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 720-97897/6

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec.		RPD
							Limits	RPD	
n-Butylbenzene	25.0	31.2		ug/L		125	79 - 142	2	20
sec-Butylbenzene	25.0	31.6		ug/L		126	81 - 134	4	20
tert-Butylbenzene	25.0	31.1		ug/L		124	82 - 135	4	20
Carbon disulfide	25.0	28.6		ug/L		114	58 - 124	2	20
Carbon tetrachloride	25.0	25.1		ug/L		100	77 - 146	1	20
Chlorobenzene	25.0	28.0		ug/L		112	70 - 130	5	20
Chloroethane	25.0	22.2		ug/L		89	62 - 138	0	20
Chloroform	25.0	24.9		ug/L		100	70 - 130	3	20
Chloromethane	25.0	21.9		ug/L		88	52 - 175	1	20
2-Chlorotoluene	25.0	29.6		ug/L		118	70 - 130	5	20
4-Chlorotoluene	25.0	29.1		ug/L		116	70 - 130	4	20
Chlorodibromomethane	25.0	29.0		ug/L		116	78 - 145	5	20
1,2-Dichlorobenzene	25.0	28.5		ug/L		114	70 - 130	2	20
1,3-Dichlorobenzene	25.0	29.2		ug/L		117	70 - 130	2	20
1,4-Dichlorobenzene	25.0	28.4		ug/L		114	87 - 118	2	20
1,3-Dichloropropane	25.0	28.1		ug/L		112	82 - 128	6	20
1,1-Dichloropropene	25.0	28.6		ug/L		114	70 - 130	2	20
1,2-Dibromo-3-Chloropropane	25.0	31.0		ug/L		124	72 - 136	2	20
Ethylene Dibromide	25.0	29.9		ug/L		120	70 - 130	5	20
Dibromomethane	25.0	26.9		ug/L		108	70 - 130	5	20
Dichlorodifluoromethane	25.0	19.6		ug/L		78	33 - 125	1	20
1,1-Dichloroethane	25.0	26.0		ug/L		104	70 - 130	2	20
1,2-Dichloroethane	25.0	23.6		ug/L		94	70 - 126	3	20
1,1-Dichloroethene	25.0	25.5		ug/L		102	64 - 128	3	20
cis-1,2-Dichloroethene	25.0	29.4		ug/L		118	70 - 130	2	20
trans-1,2-Dichloroethene	25.0	23.8		ug/L		95	68 - 118	3	20
1,2-Dichloropropane	25.0	27.8		ug/L		111	70 - 130	5	20
cis-1,3-Dichloropropene	25.0	26.7		ug/L		107	88 - 137	6	20
trans-1,3-Dichloropropene	25.0	28.9		ug/L		116	83 - 140	6	20
Ethylbenzene	25.0	28.0		ug/L		112	86 - 135	5	20
Hexachlorobutadiene	25.0	28.9		ug/L		116	70 - 130	0	20
2-Hexanone	125	127		ug/L		102	60 - 164	3	20
Isopropylbenzene	25.0	32.5		ug/L		130	70 - 130	5	20
4-Isopropyltoluene	25.0	30.4		ug/L		122	70 - 130	3	20
Methylene Chloride	25.0	24.8		ug/L		99	73 - 147	2	20
4-Methyl-2-pentanone (MIBK)	125	135		ug/L		108	63 - 165	4	20
Naphthalene	25.0	29.3		ug/L		117	78 - 135	2	20
N-Propylbenzene	25.0	31.0		ug/L		124	70 - 130	5	20
Styrene	25.0	29.8		ug/L		119	70 - 130	4	20
1,1,1,2-Tetrachloroethane	25.0	29.6		ug/L		118	70 - 130	4	20
1,1,2,2-Tetrachloroethane	25.0	28.4		ug/L		114	70 - 130	3	20
Tetrachloroethene	25.0	28.9		ug/L		116	70 - 130	3	20
Toluene	25.0	27.7		ug/L		111	83 - 129	5	20
1,2,3-Trichlorobenzene	25.0	30.1		ug/L		120	70 - 130	0	20
1,2,4-Trichlorobenzene	25.0	30.7		ug/L		123	70 - 130	0	20
1,1,1-Trichloroethane	25.0	25.2		ug/L		101	70 - 130	1	20
1,1,2-Trichloroethane	25.0	28.5		ug/L		114	82 - 128	5	20
Trichloroethene	25.0	27.3		ug/L		109	70 - 130	2	20
Trichlorofluoromethane	25.0	21.9		ug/L		88	66 - 132	0	20
1,2,3-Trichloropropane	25.0	28.4		ug/L		114	70 - 130	4	20

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCSD 720-97897/6

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec.		RPD	Limit
							Limits	RPD		
1,1,2-Trichloro-1,2,2-trifluoroethane	25.0	27.1		ug/L		108	42 - 162	1	20	
1,2,4-Trimethylbenzene	25.0	30.5		ug/L		122	70 - 132	4	20	
1,3,5-Trimethylbenzene	25.0	31.2		ug/L		125	70 - 130	5	20	
Vinyl acetate	25.0	23.8		ug/L		95	43 - 163	3	20	
Vinyl chloride	25.0	20.3		ug/L		81	63 - 125	0	20	
2,2-Dichloropropane	25.0	27.5		ug/L		110	70 - 140	2	20	

Surrogate	% Recovery	LCSD Qualifier	LCSD Limits
1,2-Dichloroethane-d4 (Surr)	86		67 - 130
Toluene-d8 (Surr)	105		70 - 130

Lab Sample ID: LCSD 720-97897/8

Matrix: Water

Analysis Batch: 97897

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec.		RPD	Limit
							Limits	RPD		
Gasoline Range Organics (GRO) -C5-C12	500	390		ug/L		78	62 - 117	5	20	

Surrogate	% Recovery	LCSD Qualifier	LCSD Limits
1,2-Dichloroethane-d4 (Surr)	89		67 - 130
Toluene-d8 (Surr)	105		70 - 130

Lab Sample ID: MB 720-98024/5

Matrix: Water

Analysis Batch: 98024

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Methyl tert-butyl ether	ND		0.50		ug/L		08/27/11 10:54	1	
Acetone	ND		50		ug/L		08/27/11 10:54	1	
Benzene	ND		0.50		ug/L		08/27/11 10:54	1	
Dichlorobromomethane	ND		0.50		ug/L		08/27/11 10:54	1	
Bromobenzene	ND		1.0		ug/L		08/27/11 10:54	1	
Chlorobromomethane	ND		1.0		ug/L		08/27/11 10:54	1	
Bromoform	ND		1.0		ug/L		08/27/11 10:54	1	
Bromomethane	ND		1.0		ug/L		08/27/11 10:54	1	
2-Butanone (MEK)	ND		50		ug/L		08/27/11 10:54	1	
n-Butylbenzene	ND		1.0		ug/L		08/27/11 10:54	1	
sec-Butylbenzene	ND		1.0		ug/L		08/27/11 10:54	1	
tert-Butylbenzene	ND		1.0		ug/L		08/27/11 10:54	1	
Carbon disulfide	ND		5.0		ug/L		08/27/11 10:54	1	
Carbon tetrachloride	ND		0.50		ug/L		08/27/11 10:54	1	
Chlorobenzene	ND		0.50		ug/L		08/27/11 10:54	1	
Chloroethane	ND		1.0		ug/L		08/27/11 10:54	1	
Chloroform	ND		1.0		ug/L		08/27/11 10:54	1	
Chloromethane	ND		1.0		ug/L		08/27/11 10:54	1	
2-Chlorotoluene	ND		0.50		ug/L		08/27/11 10:54	1	

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 720-98024/5

Matrix: Water

Analysis Batch: 98024

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB	MB	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
4-Chlorotoluene	ND		0.50		ug/L			08/27/11 10:54	1
Chlorodibromomethane	ND		0.50		ug/L			08/27/11 10:54	1
1,2-Dichlorobenzene	ND		0.50		ug/L			08/27/11 10:54	1
1,3-Dichlorobenzene	ND		0.50		ug/L			08/27/11 10:54	1
1,4-Dichlorobenzene	ND		0.50		ug/L			08/27/11 10:54	1
1,3-Dichloropropane	ND		1.0		ug/L			08/27/11 10:54	1
1,1-Dichloropropene	ND		0.50		ug/L			08/27/11 10:54	1
1,2-Dibromo-3-Chloropropane	ND		1.0		ug/L			08/27/11 10:54	1
Ethylene Dibromide	ND		0.50		ug/L			08/27/11 10:54	1
Dibromomethane	ND		0.50		ug/L			08/27/11 10:54	1
Dichlorodifluoromethane	ND		0.50		ug/L			08/27/11 10:54	1
1,1-Dichloroethane	ND		0.50		ug/L			08/27/11 10:54	1
1,2-Dichloroethane	ND		0.50		ug/L			08/27/11 10:54	1
1,1-Dichloroethene	ND		0.50		ug/L			08/27/11 10:54	1
cis-1,2-Dichloroethene	ND		0.50		ug/L			08/27/11 10:54	1
trans-1,2-Dichloroethene	ND		0.50		ug/L			08/27/11 10:54	1
1,2-Dichloropropane	ND		0.50		ug/L			08/27/11 10:54	1
cis-1,3-Dichloropropene	ND		0.50		ug/L			08/27/11 10:54	1
trans-1,3-Dichloropropene	ND		0.50		ug/L			08/27/11 10:54	1
Ethylbenzene	ND		0.50		ug/L			08/27/11 10:54	1
Hexachlorobutadiene	ND		1.0		ug/L			08/27/11 10:54	1
2-Hexanone	ND		50		ug/L			08/27/11 10:54	1
Isopropylbenzene	ND		0.50		ug/L			08/27/11 10:54	1
4-Isopropyltoluene	ND		1.0		ug/L			08/27/11 10:54	1
Methylene Chloride	ND		5.0		ug/L			08/27/11 10:54	1
4-Methyl-2-pentanone (MIBK)	ND		50		ug/L			08/27/11 10:54	1
Naphthalene	ND		1.0		ug/L			08/27/11 10:54	1
N-Propylbenzene	ND		1.0		ug/L			08/27/11 10:54	1
Styrene	ND		0.50		ug/L			08/27/11 10:54	1
1,1,1,2-Tetrachloroethane	ND		0.50		ug/L			08/27/11 10:54	1
1,1,2,2-Tetrachloroethane	ND		0.50		ug/L			08/27/11 10:54	1
Tetrachloroethene	ND		0.50		ug/L			08/27/11 10:54	1
Toluene	ND		0.50		ug/L			08/27/11 10:54	1
1,2,3-Trichlorobenzene	ND		1.0		ug/L			08/27/11 10:54	1
1,2,4-Trichlorobenzene	ND		1.0		ug/L			08/27/11 10:54	1
1,1,1-Trichloroethane	ND		0.50		ug/L			08/27/11 10:54	1
1,1,2-Trichloroethane	ND		0.50		ug/L			08/27/11 10:54	1
Trichloroethene	ND		0.50		ug/L			08/27/11 10:54	1
Trichlorofluoromethane	ND		1.0		ug/L			08/27/11 10:54	1
1,2,3-Trichloropropane	ND		0.50		ug/L			08/27/11 10:54	1
1,1,2-Trichloro-1,2,2-trifluoroethane	ND		0.50		ug/L			08/27/11 10:54	1
1,2,4-Trimethylbenzene	ND		0.50		ug/L			08/27/11 10:54	1
1,3,5-Trimethylbenzene	ND		0.50		ug/L			08/27/11 10:54	1
Vinyl acetate	ND		10		ug/L			08/27/11 10:54	1
Vinyl chloride	ND		0.50		ug/L			08/27/11 10:54	1
Xylenes, Total	ND		1.0		ug/L			08/27/11 10:54	1
2,2-Dichloropropane	ND		0.50		ug/L			08/27/11 10:54	1
Gasoline Range Organics (GRO) -C5-C12	ND		50		ug/L			08/27/11 10:54	1

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: MB 720-98024/5

Matrix: Water

Analysis Batch: 98024

Client Sample ID: Method Blank

Prep Type: Total/NA

Surrogate	MB MB		Limits	Prepared	Analyzed	Dil Fac
	% Recovery	Qualifier				
4-Bromofluorobenzene	95		67 - 130		08/27/11 10:54	1
1,2-Dichloroethane-d4 (Surr)	115		67 - 130		08/27/11 10:54	1
Toluene-d8 (Surr)	98		70 - 130		08/27/11 10:54	1

Lab Sample ID: LCS 720-98024/8

Matrix: Water

Analysis Batch: 98024

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS LCS		Unit	D	% Rec	% Rec. Limits
		Result	Qualifier				
Gasoline Range Organics (GRO) -C5-C12	500	426		ug/L		85	62 - 117

Surrogate	LCS LCS		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	103		67 - 130
1,2-Dichloroethane-d4 (Surr)	112		67 - 130
Toluene-d8 (Surr)	100		70 - 130

Lab Sample ID: LCSD 720-98024/9

Matrix: Water

Analysis Batch: 98024

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD LCSD		Unit	D	% Rec	% Rec. Limits	RPD	Limit
		Result	Qualifier						
Gasoline Range Organics (GRO) -C5-C12	500	417		ug/L		83	62 - 117	2	20

Surrogate	LCSD LCSD		Limits
	% Recovery	Qualifier	
4-Bromofluorobenzene	101		67 - 130
1,2-Dichloroethane-d4 (Surr)	114		67 - 130
Toluene-d8 (Surr)	101		70 - 130

Lab Sample ID: MB 720-98055/5

Matrix: Water

Analysis Batch: 98055

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB MB		RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier							
Tetrachloroethene	ND		0.50		ug/L			08/29/11 09:32	1
Gasoline Range Organics (GRO) -C5-C12	ND		50		ug/L			08/29/11 09:32	1

Surrogate	MB MB		Limits	Prepared	Analyzed	Dil Fac
	% Recovery	Qualifier				
4-Bromofluorobenzene	92		67 - 130		08/29/11 09:32	1
1,2-Dichloroethane-d4 (Surr)	85		67 - 130		08/29/11 09:32	1
Toluene-d8 (Surr)	98		70 - 130		08/29/11 09:32	1

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)

Lab Sample ID: LCS 720-98055/6

Matrix: Water

Analysis Batch: 98055

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits
Tetrachloroethene	25.0	31.9		ug/L		128	70 - 130
Surrogate							
	% Recovery	Qualifier	Limits				
4-Bromofluorobenzene	99		67 - 130				
1,2-Dichloroethane-d4 (Surr)	83		67 - 130				
Toluene-d8 (Surr)	104		70 - 130				

Lab Sample ID: LCS 720-98055/8

Matrix: Water

Analysis Batch: 98055

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits
Gasoline Range Organics (GRO) -C5-C12	500	407		ug/L		81	62 - 117
Surrogate							
	% Recovery	Qualifier	Limits				
4-Bromofluorobenzene	99		67 - 130				
1,2-Dichloroethane-d4 (Surr)	82		67 - 130				
Toluene-d8 (Surr)	104		70 - 130				

Lab Sample ID: LCSD 720-98055/7

Matrix: Water

Analysis Batch: 98055

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec. Limits	RPD	RPD Limit
Tetrachloroethene	25.0	31.4		ug/L		126	70 - 130	2	20
Surrogate									
	% Recovery	Qualifier	Limits						
4-Bromofluorobenzene	100		67 - 130						
1,2-Dichloroethane-d4 (Surr)	87		67 - 130						
Toluene-d8 (Surr)	105		70 - 130						

Lab Sample ID: LCSD 720-98055/9

Matrix: Water

Analysis Batch: 98055

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec. Limits	RPD	RPD Limit
Gasoline Range Organics (GRO) -C5-C12	500	416		ug/L		83	62 - 117	2	20
Surrogate									
	% Recovery	Qualifier	Limits						
4-Bromofluorobenzene	99		67 - 130						
1,2-Dichloroethane-d4 (Surr)	79		67 - 130						
Toluene-d8 (Surr)	104		70 - 130						

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B/CA_LUFTMS - 8260B / CA LUFT MS

Lab Sample ID: MB 720-98066/1-A

Matrix: Solid

Analysis Batch: 98058

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 98066

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
sec-Butylbenzene	ND		500		ug/Kg		08/29/11 08:00	08/29/11 11:13	100
N-Propylbenzene	ND		500		ug/Kg		08/29/11 08:00	08/29/11 11:13	100
Gasoline Range Organics (GRO) -C5-C12	ND		25000		ug/Kg		08/29/11 08:00	08/29/11 11:13	100

Surrogate	MB % Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene	96		66 - 148	08/29/11 08:00	08/29/11 11:13	100
1,2-Dichloroethane-d4 (Surr)	93		62 - 137	08/29/11 08:00	08/29/11 11:13	100
Toluene-d8 (Surr)	96		65 - 141	08/29/11 08:00	08/29/11 11:13	100

Lab Sample ID: LCS 720-98066/2-A

Matrix: Solid

Analysis Batch: 98058

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 98066

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits
sec-Butylbenzene	2500	2620		ug/Kg		105	62 - 153
N-Propylbenzene	2500	2560		ug/Kg		102	65 - 144

Surrogate	LCS % Recovery	LCS Qualifier	Limits
4-Bromofluorobenzene	96		66 - 148
1,2-Dichloroethane-d4 (Surr)	94		62 - 137
Toluene-d8 (Surr)	99		65 - 141

Lab Sample ID: LCS 720-98066/4-A

Matrix: Solid

Analysis Batch: 98058

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 98066

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits
Gasoline Range Organics (GRO) -C5-C12	50000	41900		ug/Kg		84	60 - 116

Surrogate	LCS % Recovery	LCS Qualifier	Limits
4-Bromofluorobenzene	98		66 - 148
1,2-Dichloroethane-d4 (Surr)	93		62 - 137
Toluene-d8 (Surr)	99		65 - 141

Lab Sample ID: LCSD 720-98066/3-A

Matrix: Solid

Analysis Batch: 98058

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 98066

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec. Limits	RPD	RPD Limit
sec-Butylbenzene	2500	2670		ug/Kg		107	62 - 153	2	20
N-Propylbenzene	2500	2600		ug/Kg		104	65 - 144	2	20

Surrogate	LCSD % Recovery	LCSD Qualifier	Limits
4-Bromofluorobenzene	94		66 - 148
1,2-Dichloroethane-d4 (Surr)	90		62 - 137
Toluene-d8 (Surr)	98		65 - 141

QC Sample Results

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method: 8260B/CA_LUFTMS - 8260B / CA LUFT MS (Continued)

Lab Sample ID: LCSD 720-98066/5-A

Matrix: Solid

Analysis Batch: 98058

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 98066

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec. Limits	RPD	RPD Limit
Gasoline Range Organics (GRO) -C5-C12	50000	40900		ug/Kg		82	60 - 116	2	20

Surrogate	LCSD % Recovery	LCSD Qualifier	Limits
4-Bromofluorobenzene	97		66 - 148
1,2-Dichloroethane-d4 (Surr)	93		62 - 137
Toluene-d8 (Surr)	98		65 - 141

Method: 8015B - Diesel Range Organics (DRO) (GC)

Lab Sample ID: MB 720-97911/1-A

Matrix: Solid

Analysis Batch: 97965

Client Sample ID: Method Blank

Prep Type: Total/NA

Prep Batch: 97911

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Diesel Range Organics [C10-C28]	ND		1.0		mg/Kg		08/25/11 09:07	08/26/11 11:53	1
Stoddard Solvent Range Organics (C9-C13)	ND		1.0		mg/Kg		08/25/11 09:07	08/26/11 11:53	1
Motor Oil Range Organics [C24-C36]	ND		50		mg/Kg		08/25/11 09:07	08/26/11 11:53	1

Surrogate	MB % Recovery	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
p-Terphenyl	97		50 - 150	08/25/11 09:07	08/26/11 11:53	1

Lab Sample ID: LCS 720-97911/2-A

Matrix: Solid

Analysis Batch: 97965

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Prep Batch: 97911

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	% Rec	% Rec. Limits
Diesel Range Organics [C10-C28]	83.1	75.2		mg/Kg		91	50 - 150

Surrogate	LCS % Recovery	LCS Qualifier	Limits
p-Terphenyl	105		50 - 150

Lab Sample ID: LCSD 720-97911/3-A

Matrix: Solid

Analysis Batch: 97965

Client Sample ID: Lab Control Sample Dup

Prep Type: Total/NA

Prep Batch: 97911

Analyte	Spike Added	LCSD Result	LCSD Qualifier	Unit	D	% Rec	% Rec. Limits	RPD	RPD Limit
Diesel Range Organics [C10-C28]	83.3	77.6		mg/Kg		93	50 - 150	3	35

Surrogate	LCSD % Recovery	LCSD Qualifier	Limits
p-Terphenyl	101		50 - 150

QC Association Summary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

GC/MS VOA

Prep Batch: 97869

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-2	GC-1-5'-3"	Total/NA	Solid	5030B	
720-37099-6	GC-1A-S-3'	Total/NA	Solid	5030B	
LCS 720-97869/2-A	Lab Control Sample	Total/NA	Solid	5030B	
LCS 720-97869/4-A	Lab Control Sample	Total/NA	Solid	5030B	
LCSD 720-97869/3-A	Lab Control Sample Dup	Total/NA	Solid	5030B	
LCSD 720-97869/5-A	Lab Control Sample Dup	Total/NA	Solid	5030B	
MB 720-97869/1-A	Method Blank	Total/NA	Solid	5030B	

Analysis Batch: 97872

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-3	GC-2-GW-10'	Total/NA	Water	8260B	
720-37099-4	GC-2-GW-23'	Total/NA	Water	8260B	
720-37099-5	GC-1-GW-22.5'	Total/NA	Water	8260B	
LCS 720-97872/5	Lab Control Sample	Total/NA	Water	8260B	
LCS 720-97872/7	Lab Control Sample	Total/NA	Water	8260B	
LCSD 720-97872/6	Lab Control Sample Dup	Total/NA	Water	8260B	
LCSD 720-97872/8	Lab Control Sample Dup	Total/NA	Water	8260B	
MB 720-97872/4	Method Blank	Total/NA	Water	8260B	

Analysis Batch: 97875

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-2	GC-1-5'-3"	Total/NA	Solid	8260B	97869
720-37099-6	GC-1A-S-3'	Total/NA	Solid	8260B	97869
LCS 720-97869/2-A	Lab Control Sample	Total/NA	Solid	8260B	97869
LCS 720-97869/4-A	Lab Control Sample	Total/NA	Solid	8260B	97869
LCSD 720-97869/3-A	Lab Control Sample Dup	Total/NA	Solid	8260B	97869
LCSD 720-97869/5-A	Lab Control Sample Dup	Total/NA	Solid	8260B	97869
MB 720-97869/1-A	Method Blank	Total/NA	Solid	8260B	97869

Analysis Batch: 97897

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-1	TB-082311	Total/NA	Water	8260B	
LCS 720-97897/5	Lab Control Sample	Total/NA	Water	8260B	
LCS 720-97897/7	Lab Control Sample	Total/NA	Water	8260B	
LCSD 720-97897/6	Lab Control Sample Dup	Total/NA	Water	8260B	
LCSD 720-97897/8	Lab Control Sample Dup	Total/NA	Water	8260B	
MB 720-97897/4	Method Blank	Total/NA	Water	8260B	

Analysis Batch: 98024

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-3	GC-2-GW-10'	Total/NA	Water	8260B	
720-37099-4	GC-2-GW-23'	Total/NA	Water	8260B	
LCS 720-98024/8	Lab Control Sample	Total/NA	Water	8260B	
LCSD 720-98024/9	Lab Control Sample Dup	Total/NA	Water	8260B	
MB 720-98024/5	Method Blank	Total/NA	Water	8260B	

Analysis Batch: 98055

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-5	GC-1-GW-22.5'	Total/NA	Water	8260B	
LCS 720-98055/6	Lab Control Sample	Total/NA	Water	8260B	
LCS 720-98055/8	Lab Control Sample	Total/NA	Water	8260B	
LCSD 720-98055/7	Lab Control Sample Dup	Total/NA	Water	8260B	

QC Association Summary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

GC/MS VOA (Continued)

Analysis Batch: 98055 (Continued)

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
LCSD 720-98055/9	Lab Control Sample Dup	Total/NA	Water	8260B	
MB 720-98055/5	Method Blank	Total/NA	Water	8260B	

Analysis Batch: 98058

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-2	GC-1-5'-3"	Total/NA	Solid	8260B/CA_LUFT MS	98066
720-37099-6	GC-1A-S-3'	Total/NA	Solid	8260B/CA_LUFT MS	98066
LCS 720-98066/2-A	Lab Control Sample	Total/NA	Solid	8260B/CA_LUFT MS	98066
LCS 720-98066/4-A	Lab Control Sample	Total/NA	Solid	8260B/CA_LUFT MS	98066
LCSD 720-98066/3-A	Lab Control Sample Dup	Total/NA	Solid	8260B/CA_LUFT MS	98066
LCSD 720-98066/5-A	Lab Control Sample Dup	Total/NA	Solid	8260B/CA_LUFT MS	98066
MB 720-98066/1-A	Method Blank	Total/NA	Solid	8260B/CA_LUFT MS	98066

Prep Batch: 98066

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-2	GC-1-5'-3"	Total/NA	Solid	5030B	
720-37099-6	GC-1A-S-3'	Total/NA	Solid	5030B	
LCS 720-98066/2-A	Lab Control Sample	Total/NA	Solid	5030B	
LCS 720-98066/4-A	Lab Control Sample	Total/NA	Solid	5030B	
LCSD 720-98066/3-A	Lab Control Sample Dup	Total/NA	Solid	5030B	
LCSD 720-98066/5-A	Lab Control Sample Dup	Total/NA	Solid	5030B	
MB 720-98066/1-A	Method Blank	Total/NA	Solid	5030B	

GC Semi VOA

Prep Batch: 97911

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-2	GC-1-5'-3"	Total/NA	Solid	3546	
720-37099-6	GC-1A-S-3'	Total/NA	Solid	3546	
LCS 720-97911/2-A	Lab Control Sample	Total/NA	Solid	3546	
LCSD 720-97911/3-A	Lab Control Sample Dup	Total/NA	Solid	3546	
MB 720-97911/1-A	Method Blank	Total/NA	Solid	3546	

Analysis Batch: 97965

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
720-37099-2	GC-1-5'-3"	Total/NA	Solid	8015B	97911
720-37099-6	GC-1A-S-3'	Total/NA	Solid	8015B	97911
LCS 720-97911/2-A	Lab Control Sample	Total/NA	Solid	8015B	97911
LCSD 720-97911/3-A	Lab Control Sample Dup	Total/NA	Solid	8015B	97911
MB 720-97911/1-A	Method Blank	Total/NA	Solid	8015B	97911

Lab Chronicle

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Client Sample ID: TB-082311

Lab Sample ID: 720-37099-1

Date Collected: 08/23/11 00:00

Matrix: Water

Date Received: 08/23/11 17:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	97897	08/25/11 15:00	AC	TAL SF

Client Sample ID: GC-1-5'-3"

Lab Sample ID: 720-37099-2

Date Collected: 08/23/11 11:15

Matrix: Solid

Date Received: 08/23/11 17:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Prep	5030B			97869	08/24/11 14:13	PGM	TAL SF
Total/NA	Analysis	8260B		1	97875	08/25/11 05:07	AC	TAL SF
Total/NA	Prep	5030B			98066	08/29/11 08:00	AC	TAL SF
Total/NA	Analysis	8260B/CA_LUFTMS		100	98058	08/29/11 14:17	YB	TAL SF
Total/NA	Prep	3546			97911	08/25/11 09:07	AM	TAL SF
Total/NA	Analysis	8015B		2	97965	08/26/11 12:16	DH	TAL SF

Client Sample ID: GC-2-GW-10'

Lab Sample ID: 720-37099-3

Date Collected: 08/23/11 11:30

Matrix: Water

Date Received: 08/23/11 17:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	97872	08/25/11 03:51	AC	TAL SF
Total/NA	Analysis	8260B		50	98024	08/27/11 15:44	AC	TAL SF

Client Sample ID: GC-2-GW-23'

Lab Sample ID: 720-37099-4

Date Collected: 08/23/11 13:10

Matrix: Water

Date Received: 08/23/11 17:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	97872	08/25/11 04:21	AC	TAL SF
Total/NA	Analysis	8260B		1	98024	08/27/11 16:13	AC	TAL SF

Client Sample ID: GC-1-GW-22.5'

Lab Sample ID: 720-37099-5

Date Collected: 08/23/11 14:25

Matrix: Water

Date Received: 08/23/11 17:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	97872	08/25/11 04:52	AC	TAL SF
Total/NA	Analysis	8260B		1	98055	08/29/11 13:49	AC	TAL SF

Client Sample ID: GC-1A-S-3'

Lab Sample ID: 720-37099-6

Date Collected: 08/23/11 14:50

Matrix: Solid

Date Received: 08/23/11 17:20

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Prepared Or Analyzed	Analyst	Lab
Total/NA	Prep	5030B			97869	08/24/11 14:13	PGM	TAL SF

Lab Chronicle

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Client Sample ID: GC-1A-S-3'

Lab Sample ID: 720-37099-6

Date Collected: 08/23/11 14:50

Matrix: Solid

Date Received: 08/23/11 17:20

<u>Prep Type</u>	<u>Batch Type</u>	<u>Batch Method</u>	<u>Run</u>	<u>Dilution Factor</u>	<u>Batch Number</u>	<u>Prepared Or Analyzed</u>	<u>Analyst</u>	<u>Lab</u>
Total/NA	Analysis	8260B		1	97875	08/25/11 04:35	AC	TAL SF
Total/NA	Prep	5030B			98066	08/29/11 08:00	AC	TAL SF
Total/NA	Analysis	8260B/CA_LUFTMS		100	98058	08/29/11 13:46	YB	TAL SF
Total/NA	Prep	3546			97911	08/25/11 09:07	AM	TAL SF
Total/NA	Analysis	8015B		5	97965	08/26/11 12:40	DH	TAL SF

Laboratory References:

TAL SF = TestAmerica San Francisco, 1220 Quarry Lane, Pleasanton, CA 94566, TEL (925)484-1919

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Certification Summary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Laboratory	Authority	Program	EPA Region	Certification ID
TestAmerica San Francisco	California	State Program	9	2496

Accreditation may not be offered or required for all methods and analytes reported in this package. Please contact your project manager for the laboratory's current list of certified methods and analytes.

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Method Summary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Method	Method Description	Protocol	Laboratory
8260B	Volatile Organic Compounds (GC/MS)	SW846	TAL SF
8260B/CA_LUFTM S	8260B / CA LUFT MS	SW846	TAL SF
8015B	Diesel Range Organics (DRO) (GC)	SW846	TAL SF

Protocol References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

Laboratory References:

TAL SF = TestAmerica San Francisco, 1220 Quarry Lane, Pleasanton, CA 94566, TEL (925)484-1919

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Sample Summary

Client: Ground Zero Analysis Inc
Project/Site: Fairfield

TestAmerica Job ID: 720-37099-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
720-37099-1	TB-082311	Water	08/23/11 00:00	08/23/11 17:20
720-37099-2	GC-1-5'-3"	Solid	08/23/11 11:15	08/23/11 17:20
720-37099-3	GC-2-GW-10'	Water	08/23/11 11:30	08/23/11 17:20
720-37099-4	GC-2-GW-23'	Water	08/23/11 13:10	08/23/11 17:20
720-37099-5	GC-1-GW-22.5'	Water	08/23/11 14:25	08/23/11 17:20
720-37099-6	GC-1A-S-3'	Solid	08/23/11 14:50	08/23/11 17:20

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TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

TESTAMERICA SALES
1220 Quarry Lane
Pleasanton CA 94566-4756
Phone: (925) 484-1919 • Fax: (925) 600-3002

Reference #: 133255

Date 8/23/2011 Page 1 of 1

Report To

Analysis Request

Attn: <u>Sym Spectroscopie</u>	Company: <u>Ground Zero Analysis</u>	Address: <u>411714 Main St, Escalon CA</u>	Phone: <u>SLBARTH@comcast.net</u>	Sampled By: <u>S. Drahtwarte</u>	Phone: <u>(925) 576-7609</u>	TPH EPA - <input checked="" type="checkbox"/> 8260B <input checked="" type="checkbox"/> Gas w/ <input checked="" type="checkbox"/> BTEX <input checked="" type="checkbox"/> MTBE	TEPH EPA 8015M* <input type="checkbox"/> Silica Gel <input checked="" type="checkbox"/> Diesel <input checked="" type="checkbox"/> Motor Oil <input type="checkbox"/> Other	EPA 8260B: <input checked="" type="checkbox"/> Gas <input checked="" type="checkbox"/> BTEX <input checked="" type="checkbox"/> MTBE <input type="checkbox"/> 5 Oxygenates <input type="checkbox"/> DCA, EDB <input type="checkbox"/> Ethanol	(HVOcs) EPA 8021 by 8260B	Volatile Organics GC/MS (VOCs) <input checked="" type="checkbox"/> EPA 8260B <input type="checkbox"/> 624	Semivolatiles GC/MS <input type="checkbox"/> EPA 8270 <input type="checkbox"/> 625	Oil and Grease <input checked="" type="checkbox"/> Petroleum (EPA 1664) <input type="checkbox"/> Total	Pesticides <input type="checkbox"/> EPA 8081 <input type="checkbox"/> 608 PCBs <input type="checkbox"/> EPA 8082 <input type="checkbox"/> 608	PNAs by <input type="checkbox"/> 8270 <input type="checkbox"/> 8310	CAM17 Metals (EPA 6010/7470/7471)	Metals: <input type="checkbox"/> Lead <input type="checkbox"/> LUFT <input type="checkbox"/> RCRA <input type="checkbox"/> Other:	Low Level Metals by EPA 200.8/6020 (ICP-MS):	<input type="checkbox"/> W.E.T (STLC) <input type="checkbox"/> TCLP	<input type="checkbox"/> Hexavalent Chromium <input type="checkbox"/> pH (24h hold time for H ₂ O)	<input type="checkbox"/> Spec. Cond. <input type="checkbox"/> Alkalinity <input type="checkbox"/> TSS <input type="checkbox"/> TDS	Anions: <input type="checkbox"/> Cl <input type="checkbox"/> SO ₄ <input type="checkbox"/> NO ₃ <input type="checkbox"/> F <input type="checkbox"/> Br <input type="checkbox"/> NO ₂ <input type="checkbox"/> PO ₄	<u>Stoddard solvent</u>	Number of Containers		
Bill To: <u>Ground Zero</u>	Company: <u>Ground Zero Analysis</u>	Address: <u>411714 Main St, Escalon CA</u>	Phone: <u>SLBARTH@comcast.net</u>	Sampled By: <u>S. Drahtwarte</u>	Phone: <u>(925) 576-7609</u>																				
Sample ID: <u>7B-082311</u>	Date: <u>8/23/11</u>	Time: <u>11:15 S</u>	Mat: <u>W</u>	Preserv: <u>HCL</u>																					
<u>GC-1-5'-3"</u>																									
<u>GC-2-GW-10'</u>																									
<u>GC-2-GW-23'</u>																									
<u>GC-1-GW-22.5'</u>																									
<u>GC-MS-3'</u>																									
<u>GC-1A-S-3'</u>																									

Project Info

Sample Receipt

Project Name: FARFIELD # of Containers: 14

Project#: B12 Head Space: 4.42

PO#: Temp: 4.42

Credit Card#: Conforms to record:

Report: Routine Level 3 Level 4 EDD State Tank

Fund EDF:

Special Instructions / Comments: Global ID
Ignore Stoddard solvent if it will be analyzed with alcohol.

Signature: [Signature] Time: 17:20

Printed Name: Sandra Drahtwarte Date: 8/23/2011

Company: Ground Zero Analysis

Signature: [Signature] Time: 17:20

Printed Name: Mu Nien Date: 8-23-11

Company:

Signature: [Signature] Time:

Printed Name: Date:

Company:

Signature: [Signature] Time:

Printed Name: Date:

Company:

Login Sample Receipt Checklist

Client: Ground Zero Analysis Inc

Job Number: 720-37099-1

Login Number: 37099

List Source: TestAmerica San Francisco

List Number: 1






Creator: Mullen, Joan

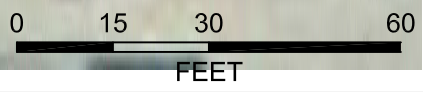
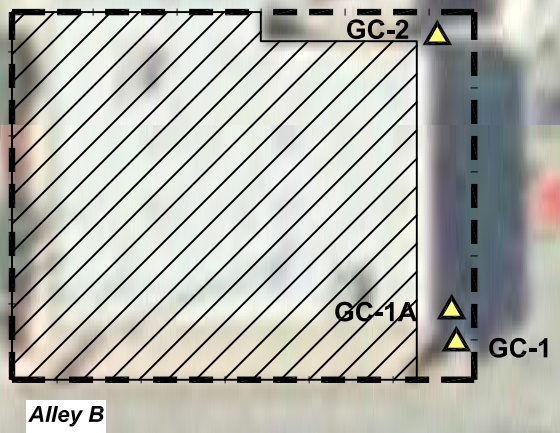
Question	Answer	Comment
Radioactivity either was not measured or, if measured, is at or below background	N/A	
The cooler's custody seal, if present, is intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	4.4
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	True	

C:\Work\EnviroCAD\GZA\Fairfield Cleaners\622 Jackson St\Work Plan\Figure 1 - GER Sample Locations.dwg Layout: Figure 3 Sep 07, 2011 - 11:06pm



LEGEND

-  Gillespie Cleaners/Solano Print/Fairfield Print
Walsohn, Spence, Duree, Inc.
622-630 Jackson Street
-  APN# 0030-243-170
-  Approximate Groundwater Flow Direction
-  GC-2  GC-1



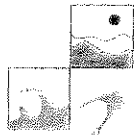
**GROUND ZERO
ANALYSIS, INC.**

Date:	09/07/11
Designed:	SB
Drawn:	OS
Checked:	SB
DWG file:	1

GE&R SAMPLE LOCATIONS
622 Jackson Street Investigation
Fairfield, California

JH0010148

Figure	1
Project	812



E₂C Remediation

Environmental Engineering,
Consulting and Remediation, Inc.

**PRELIMINARY SITE INVESTIGATION
REPORT OF FINDINGS**

**710-714 Madison Street
Fairfield, California**

**July 29, 2011
Project Number 1963BK43**

PREPARED FOR:

**Mr. Robert Farrell, Esq.
Lewis Brisbois Bisgaard & Smith LLP
One Sansome Street, Suite 1400
San Francisco, CA 94101**

PREPARED BY:

**E₂C Remediation
Environmental Engineering Consultants
5300 Woodmere Dr., Suite 105
Bakersfield, California 93313**

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1.0 INTRODUCTION

E₂C Remediation (E₂C) prepared this report of findings to document preliminary site investigation activities for the Former One Hour Cleaners facility (Site) located at 712 Madison Street in Fairfield, California (Figure 1). E₂C performed the preliminary site investigation on behalf of Lewis Brisbois, Bisgaard & Smith LLP. The work was performed pursuant to the following Inspection Demand document:

NOTICE FOR INSPECTION AND EXAMINATION OF REAL PROPERTY, SUPERIOR COURT OF CALIFORNIA, SOLANO COUNTY, Case No. FCS033636.

This Inspection Demand was submitted by the Isola Law Group, LLP of Lodi, California. The Demand included a Site Investigation Workplan, dated February 2, 2011 that was prepared by Genesis Engineering & Redevelopment (Genesis) of Ripon California (Workplan). Reportedly, the Workplan was not approved by the State of California Regional Water Quality Control Board. A copy of the Demand document is included as Appendix C.

1.1 Site Description

The Site consists of one (1) commercial building divided into three (3) separate units (710, 712 and 714 Madison Street). The 712 Madison Street unit formerly contained a dry cleaning service that operated from the early 1960's until 1998. A nursing school is currently housed in 712 and 714 Madison Street.

2.0 PRELIMINARY SITE INVESTIGATION

In their Workplan (copy included as Appendix C), Genesis selected four locations (OHM-1, OHM-2, OHM-3, and OHM-4) along the eastern side of the 710-714 Madison Street building at which to collect soil, soil vapor and grab-groundwater samples. On May 11, 2011, four borings (OHM-1, OHM-2, OHM-3, and OHM-4) were advanced by PeneCore of Woodland, California (under the supervision of Genesis) to allow for sample collection and logging of geologic materials. The locations of these borings are shown on Figure 2. Genesis obtained the primary sets of soil, soil vapor and grab-groundwater samples at each boring location with E₂C obtaining split and/or co-located soil, soil vapor and grab-groundwater samples at each boring location. Additionally, Ground Zero Analysis, Inc. of Escalon, California obtained split grab-groundwater samples from the borings on behalf of Hunsucker, Goodstein & Nelson PC. Note: only analytical results for samples obtained by E₂C are presented in this report of findings. Descriptions of drilling, sampling and sample handling methodologies are presented in the Workplan (see Appendix C).

2.1 E₂C Sample Descriptions

Descriptions of the split and/or co-located soil, soil vapor and grab-groundwater samples obtained by E₂C on May 11, 2001 are presented below.

Soil samples were:

OHM-1, (3-3.5' depth) obtained at 11:11 am;
OHM-2, (3-3.5' depth) obtained at 10:50 am;
OHM-3, (3-3.5' depth) obtained at 12:50 pm;
OHM-3, (7-7.5' depth) obtained at 1:59 pm; and
OHM-4, (3-3.5' depth) obtained at 11:46 am.

Soil vapor samples were:

OHM-1, (2-3.0' depth) obtained at 11:11 am;
OHM-2, (2-3.0' depth) obtained at 10:22 am;
OHM-3, (2-3.0' depth) obtained at 11:46 am; and
OHM-4, (2-3.0' depth) obtained at 10:47 am.

Grab-groundwater samples were:

OHM-1-10', obtained at 5:40 pm;
OHM-1-20', obtained at 6:25 pm;
OHM-2-10', obtained at 11:55 am;
OHM-2-24', obtained at 1:35 pm;
OHM-3-25', obtained at 1:59 pm; and
OHM-4-25', obtained at 5:15 pm

Note: Each of the grab-groundwater samples contained significant sediment.

Sample information and descriptions of geologic materials encountered in the borings are presented on boring logs contained in Appendix A.

2.2 Preliminary Site Investigation Laboratory Analyses

Soil, soil vapor and grab-groundwater samples obtained at the Site by E₂C on May 11, 2011 were transported under chain-of-custody to California Laboratory Services of Rancho Cordova, California. (California State-Certified analytical laboratory #1233) (CLS). Samples were analyzed in accordance with all relevant State guidelines and EPA protocols for the following constituents of concern (COCs):

2.2.1 Soil Analytical Services

Soil samples: OHM-1, 3-3.5'; OHM-2, 3-3.5'; OHM-3, 3-3.5' and 7-7.5'; and OHM-4, 3-3.5' were chemically analyzed at CLS for volatile organic compounds (VOCs) including tetrachloroethene (PCE) using EPA Method 8260B. Additionally, soil sample OHM-3, 7-7.5' was chemically analyzed at CLS for extractable petroleum hydrocarbons using EPA Method 8015M.

2.2.2 Soil Vapor Analytical Services

CLS submitted soil vapor samples: OHM-1, OHM-2, OHM-3 and OHM-4 to Smart Chemistry Corporation of Sacramento, California, where they were chemically analyzed for VOCs using Method TO-15.

2.2.3 Grab-Groundwater Analytical Services

Grab-groundwater samples: OHM-1-10', OHM-1-20', OHM-2-10', OHM-2-24', OHM-3-25' and OHM-4-25' were chemically analyzed at CLS for VOCs including PCE using EPA Method 8260B.

2.3 Preliminary Site Investigation Analytical Data

Laboratory analytical reports for soil, soil vapor and grab groundwater samples obtained at the Site by E₂C and are presented in Appendix B and are described in the following sections. Copies of sample container clean certificates are also presented in Appendix B.

2.3.1 Soil Analytical Data

Soil analytical data are summarized in Table 1 and as follows:

- PCE was reported in three (3) soil samples (OHM-1, 3-3.5'; OHM-2, 3-3.5 and OHM-3, 3-3.5') at concentrations ranging from 0.021 milligrams per kilogram (mg/kg) at OHM-3, 3-3.5' to 0.190 mg/kg at OHM-1, 3-3.5';
- Stoddard solvent was reported in one (1) soil sample (OHM-3, 7-7.5') at a concentration of 61 mg/kg; and
- Mineral oil was reported in one (1) soil sample (OHM-3, 7-7.5') at a concentration of 60 mg/kg.

2.3.2 Soil Vapor Analytical Data

Soil vapor analytical data are summarized in Table 2 and as follows:

- PCE was reported in four (4) soil vapor samples (OHM-1 through OHM-4) at concentrations ranging from 116 parts per billion by volume (ppbv) at OHM-4 to 147,000 ppbv at OHM-1; and
- Acetone was reported in one (1) soil vapor sample (OHM-4) at a concentration of 66 ppbv.

2.3.3 Grab-Groundwater Analytical Data

Grab-groundwater analytical data are summarized in Table 3 and as follows:

- PCE was reported in five (5) grab-groundwater samples (OHM-1-10', OHM-1-20', OHM-2-10', OHM-2-24', and OHM-3-25') at concentrations ranging from 2.9 micrograms per liter ($\mu\text{g/L}$) at OHM-3-25' to 38,000 $\mu\text{g/L}$ at OHM-1-20';
- Other VOCs at relatively low concentrations were also detected in the grab-groundwater samples (see Table 3).

Note: The grab-groundwater results presented herein may not reflect actual dissolved phase COC concentrations in groundwater at the Site. Grab-groundwater samples are primarily used as a reconnaissance tool to assess whether COCs are present, or absent. Grab-groundwater analytical results can be highly variable due to sediment from unknown locations within a boring being entrained in the grab-groundwater sample.

3.0 CONCLUSIONS

Based on the preliminary site investigation and laboratory analytical reports for May 11, 2011, the following conclusions are made:

- It appears that a release of COCs may have occurred at the Site; and
- The magnitude and extent of the apparent release at the Site and potential releases at other sites are unknown.

4.0 RECOMMENDATIONS

Based on the above conclusions and preliminary site investigation work, E₂C makes the following recommendations:

- Prepare a workplan for CRWQCB review that contains the required elements to complete a more thorough evaluation of site conditions and all possible sources of PCE (and related daughter products) in the vicinity of the site; and
- Upon approval of the workplan by the CRWQCB, proceed with planned site evaluation activities including report of findings preparation.

5.0 LIMITATIONS AND REPORT CERTIFICATION

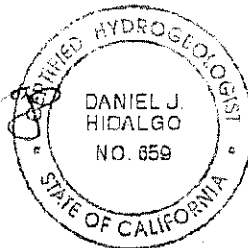
E₂C Remediation performed this investigation in accordance with the generally accepted standards of care that exists in California at this time. It should be recognized that definition and evaluation of geologic conditions is a difficult and inexact science. Judgments leading to conclusions and recommendations are generally made with limited knowledge of subsurface conditions present. No warranty, expressed or implied, is made.

This Report has been prepared under the professional supervision of the registered professional whose seal and signature appears herein. The conclusions of this report are based solely on the Scope of Services outlined and the sources of information referenced in this report. Any additional information that becomes available concerning the Site should be submitted to E₂C so that our conclusions may be reviewed and modified, if necessary. This report was prepared for the sole use of Lewis Brisbois Bisgaard & Smith LLP and/or agent(s).

Prepared By:

Daniel J Hidalgo

Daniel J Hidalgo, CHG 659
Senior Hydrogeologist
Expires June 30, 2013



Reviewed By:

Philip Goalwin

Philip Goalwin, P.G. #4779
Principal Geologist

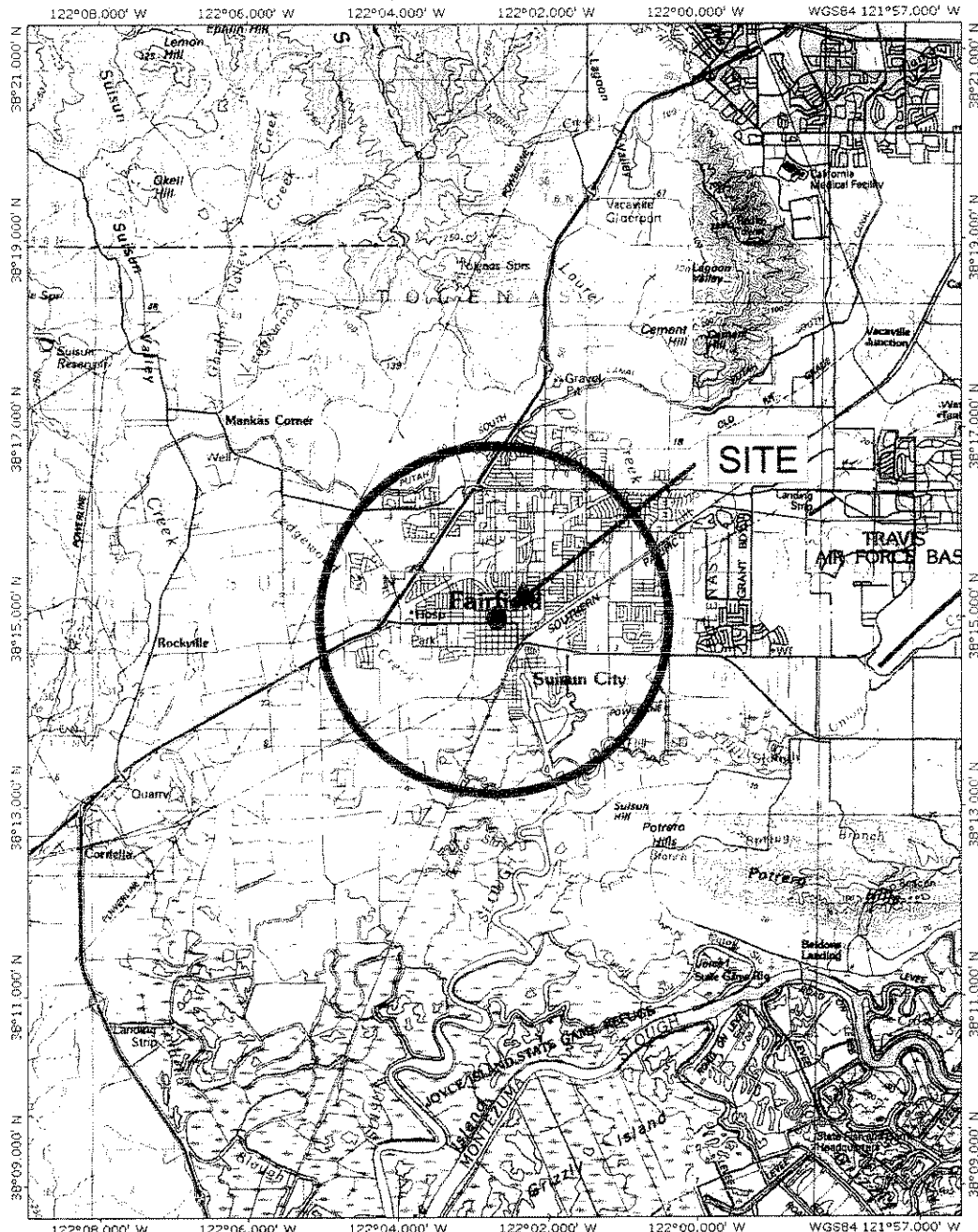


FIGURES

Figure 1 Site Location Map

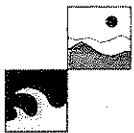
Figure 2 Site Plan

TOPOI map printed on 05/31/11 from "Untitled.tpo"



TN 15°

Map created with TOPOI® ©2003 National Geographic (www.nationalgeographic.com/topoi)



E₂C Remediation

5300 Woodmere Dr., Suite 105
Bakersfield, CA 93313

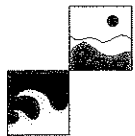
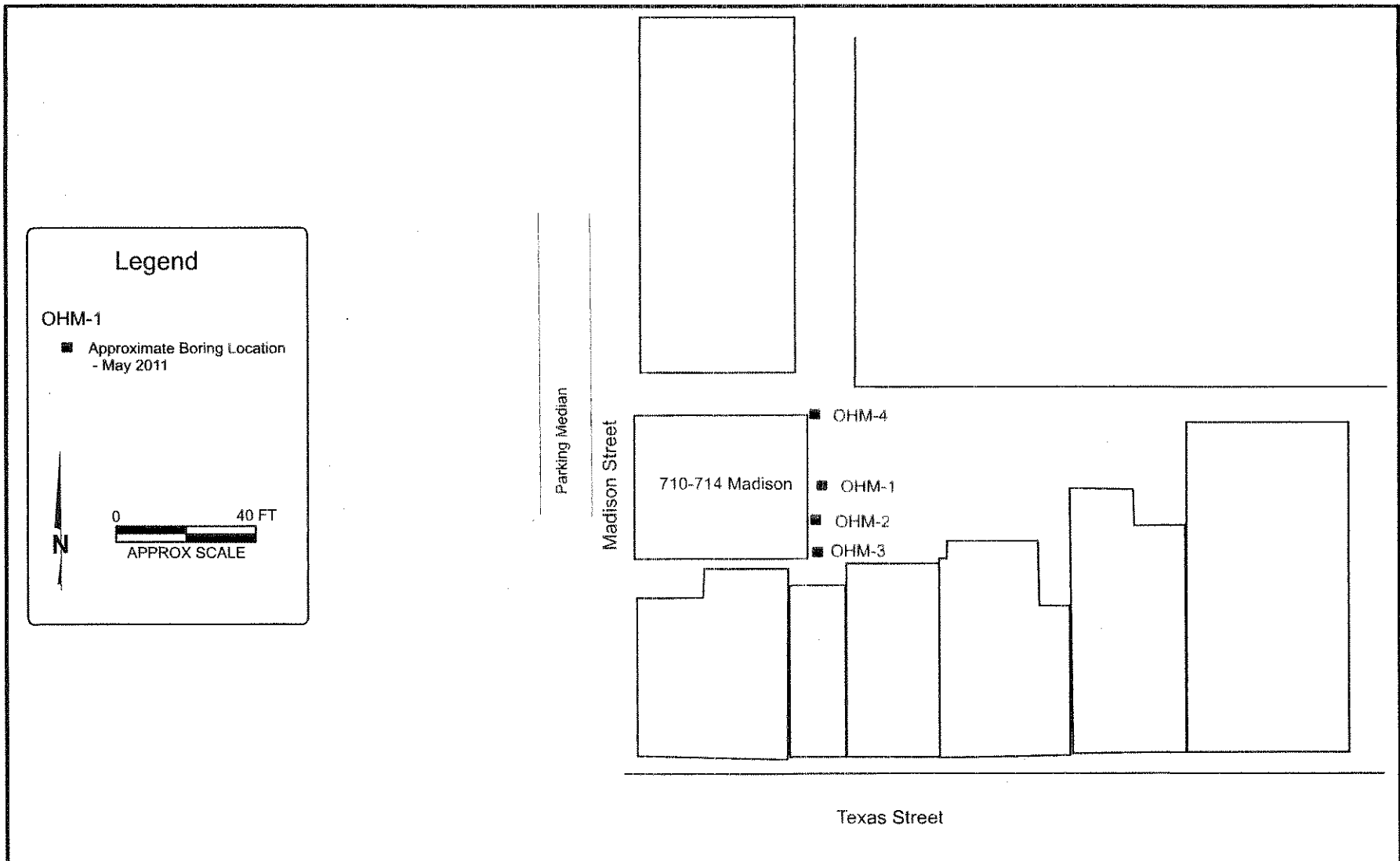
Phone: (661) 831-6906
Fax: (661) 831-6234

FORMER ONE HOUR CLEANERS
712 MADISON STREET
FAIRFIELD, CALIFORNIA

SITE LOCATION MAP

FIGURE

1



EC Remediation

5300 Woodmere Dr., Suite 105
Bakersfield, CA 93313

Phone: (661) 831-6906
Fax: (661) 831-6234

FORMER ONE HOUR CLEANERS
712 MADISON STREET
FAIRFIELD, CALIFORNIA

SITE PLAN

FIGURE

2

TABLES

- Table 1 Summary of Soil Sampling Analytical Data
- Table 2 Summary of Soil Vapor Sampling Analytical Data
- Table 3 Summary of Grab-Groundwater Sampling Analytical Data

**TABLE 1
SUMMARY OF SOIL SAMPLING ANALYTICAL DATA
FORMER ONE HOUR CLEANERS
712 Madison Street
Fairfield, California**

SAMPLE ID	SAMPLE DATE	SAMPLE DEPTH (feet)	PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCE	VC	CF	BEN	TPHd	STOD	MIN
			mg/kg										
OHM-1	5/11/2011	3-3.5	0.190	nd<0.005	nd<0.005	nd<0.005	nd<0.005	nd<0.010	nd<0.005	nd<0.005	NA	NA	NA
OHM-2		3-3.5	0.086	nd<0.005	nd<0.005	nd<0.005	nd<0.005	nd<0.010	nd<0.005	nd<0.005	NA	NA	NA
OHM-3		3-3.5	0.021	nd<0.005	nd<0.005	nd<0.005	nd<0.005	nd<0.010	nd<0.005	nd<0.005	NA	NA	NA
OHM-3		7-7.5	nd<0.005	nd<0.005	nd<0.005	nd<0.005	nd<0.005	nd<0.010	nd<0.005	nd<0.005	nd<1.0	61	60
OHM-4		3-3.5	nd<0.005	nd<0.005	nd<0.005	nd<0.005	nd<0.005	nd<0.010	nd<0.005	nd<0.005	NA	NA	NA

NOTES:

Analytical Results in milligrams per kilogram (mg/kg) = parts per million (ppm)

Analytical Methods: VOCs - EPA 8260B; TPHd, STOD, MIN - EPA 8015M

nd = Not reported at or above method detection limit, which is indicated by value

NA = Not Analyzed

PCE = tetrachloroethene

TCE = trichloroethene

cis-1,2-DCE = cis-1,2-dichloroethene

trans-1,2-DCE = trans-1,2-dichloroethene

1,1-DCE = 1,1-dichloroethene

STOD = Stoddard Solvent

TPHd = Total petroleum hydrocarbons as diesel

VC = vinyl chloride

CF = chloroform

BEN = Benzene

MIN = Mineral Oil

TABLE 2
SUMMARY OF SOIL VAPOR SAMPLING ANALYTICAL DATA
FORMER ONE HOUR CLEANERS
712 Madison Street
Fairfield, California

SAMPLE ID	SAMPLE DATE	SAMPLE DEPTH (feet)	PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCE	VC	CF	BEN	ACE	MtBE
OHM-1	5/11/2011	2.0-3.0	147,000	nd<31,000	nd<31,000	nd<31,000	nd<31,000	nd<31,000	nd<31,000	nd<31,000	nd<31,000	nd<31,000
OHM-2		2.0-3.0	10,500	nd<960	nd<960	nd<960	nd<960	nd<960	nd<960	nd<1,000	nd<1,000	nd<960
OHM-3		2.0-3.0	8,530	nd<810	nd<810	nd<810	nd<810	nd<810	nd<810	nd<800	nd<800	nd<810
OHM-4		2.0-3.0	116	nd<17	nd<17	nd<17	nd<17	nd<17	nd<17	nd<17	nd<20	66

NOTES:

Analytical Results in parts per billion by volume (ppbv)

Analytical Methods: TO-15

nd = Not reported at or above method detection limit, which is indicated by value

PCE = tetrachloroethene

TCE = trichloroethene

cis-1,2-DCE = cis-1,2-dichloroethene

trans-1,2-DCE = trans-1,2-dichloroethene

1,1-DCE = 1,1-dichloroethene

ACE = acetone

MtBE = methyl tertiary butyl ether

VC = vinyl chloride

CF = chloroform

BEN = Benzene

**TABLE 3
SUMMARY OF GRAB-GROUNDWATER ANALYTICAL DATA
FORMER ONE HOUR CLEANERS
712 Madison Street
Fairfield, California
May 11, 2011**

SAMPLE ID	PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	1,1-DCE	VC	1,1,2-TCA	1,1,1,2-PCA	CF	NAP	Benzene
	µg/L										
OHM-1-10'	4,200	nd<0.5	nd<0.5	nd<0.5	nd<0.5	nd<1.0	27	nd<0.5	1.5	nd<0.5	nd<0.5
OHM-1-20'	38,000	32	nd<0.5	nd<0.5	1.4	nd<1.0	nd<0.5	0.67	0.89	nd<0.5	nd<0.5
OHM-2-10'	9.7	2.8	6.3	nd<0.5	nd<0.5	1.7	nd<0.5	nd<0.5	1.6	6.5	nd<0.5
OHM-2-24'	19	3.4	3.3	nd<0.5	0.98	3.5	nd<0.5	nd<0.5	nd<0.5	3.5	nd<0.5
OHM-3-25'	2.9	3.9	4.4	4.2	1.1	nd<1.0	nd<0.5	nd<0.5	nd<0.5	nd<0.5	nd<0.5
OHM-4-25'	nd<0.5	nd<0.5	nd<0.5	nd<0.5	nd<0.5	nd<1.0	nd<0.5	nd<0.5	2.6	nd<0.5	nd<0.5

Results in micrograms per liter (µg/L) = parts per billion (ppb)

Analytical Methods: VOCs - EPA 8260B

nd = Not Detected at or above Method Detection Limit which is indicated by number

PCE = tetrachloroethene

TCE = trichloroethene

cis-1,2-DCE = cis-1,2-dichloroethene

trans-1,2-DCE = trans-1,2-dichloroethene

1,1-DCE = 1,1-dichloroethene

1,1,2-TCA = 1,1,2-trichloroethane

1,1,1,2-TCA = 1,1,1,2-tetrachloroethane

VC = vinyl chloride

CF = chloroform

NAP = naphthalene

APPENDICES

- Appendix A Boring Logs
- Appendix B CLS Analytical Laboratory Reports and Sample
 Container Clean Certificates
- Appendix C GE&R Site Investigation Workplan

APPENDIX A

Boring Logs

FIELD LOCATION OF BORING: **OHM-1** located along eastern side of 710-714 Madison building PAGE 1 OF 1

PROJECT NUMBER: **1973 BK** DATES DRILLED: **5-11-11**

CLIENT: _____ DRILLER: **Pen e Core**

SITE ADDRESS: **712 Madison Fairfield CA** LOGGED BY: **D. Hidalgo**

DRILLING METHOD AND EQUIPMENT: **Hand Auger and Geoprobe**

BORING DIAMETER: **3** (inches) BORING DEPTH: **20** (feet)

WATER LEVEL _____ DATE _____ TIME _____

Depth (Feet)	SAMPLE NAME	Blow Count	PID	WELL/ BORING DIAGRAM	USCS Symbol	SOIL DESCRIPTION
						0.0-0.5 ASPHALT and BASE ROCK
	OHM-1; soil vapor sample @ 11:11 am			Temporary Soil Vapor well OHM-1		Boring hand augered 0.5-5.0'
5	OHM-1; 3-3.5 (soil) @ 11:30 am			Temporary 1" dia well screen for grab water sample	CL	0.5-5.0' CLAYEY TYPE SOIL
	OHM-1-10' @ 5:40 pm (water)				ML	5.0-8.0' SILTY CLAY: Moderate Yellowish Brown; moist
10					CL	8.0-9.5' CLAY SILT: Moderate Yellowish Brown; very moist
					ML	9.5-10.0' SILTY CLAY: Moderate Yellowish Brown; moist
					CL	10.0-15.0' SILTY CLAY: Pale Brown to Orangeish Brown; moist
15					ML	~13-13.3' CLAYEY SILT (lens) Moderate Yellowish Brown moist
	OHM-1-20' @ 6:25 P (water)			Temporary 1" dia well screen	ML	15.0-17.5' SILTY CLAY: Pale Brown to Moderate Yellowish Brown; moist; charcoal pieces
20					CL	17.5-20.0' SILTY CLAY/CLAYEY SILT: Pale Brown to Moderate Yellowish Brown; moist to very moist.

Well Construction Details: **NA**

Well Depth: _____ (feet); PVC I.D.: _____ (inches); PVC Schedule: _____ ;

Screen Interval: _____ to _____ feet, bgs; Slot Size _____ (inch);

Sand (Type: _____); Placed _____ to _____ feet, bgs;

Bentonite (Type: _____); Placed _____ to _____ feet, bgs;

Cement Grout tremied: _____ to _____ feet, bgs.

COMMENTS: **clear, breezy ~68° F**

E2C Remediation
 1020 Winding Creek Road., Suite 110
 Roseville, California 95678

Phone: (916) 782-8700
 Fax: (916) 782-8049

BORING/WELL NAME:
OHM-1

Attorney Client Work Product

FIELD LOCATION OF BORING: OHM-2 located along eastern side of 710-714 Madison building PAGE 1 OF 1

PROJECT NUMBER: 1972BK DATES DRILLED: 5-11-11

CLIENT: _____ DRILLER: PeneCore

SITE ADDRESS: 712 Madison Fairfield, CA LOGGED BY: D. Hidalgo

DRILLING METHOD AND EQUIPMENT: Hand Auger and GeoProbe

BORING DIAMETER: 3 (inches) BORING DEPTH: 25 (feet)

WATER LEVEL _____ DATE _____ TIME _____

Depth (Feet)	SAMPLE NAME	Blow Count	PID	WELL/ BORING DIAGRAM	USCS Symbol	SOIL DESCRIPTION
						0.0-0.5 ASPHALT and BASE ROCK
	OHM-2; Soil vapor sample @ 10:00 am			Temporary soil vapor well OHM-2		Boring hand augered 0.5-5.0'
						0.5-5.0 CLAYEY TYPE SOIL
5	OHM-2; 2-25 (soil) @ 10:50 am			Temporary 1" dia well screen for grab water sample	CL	5.0-10.0' SILTY CLAY; Moderate yellowish brown; moist to very moist.
10	OHM-2-10' @ 11:55 am (water)				CL	10.0-15.0' SILTY CLAY; Moderate yellowish brown; moist
15					CL	15.0-20.0' SILTY CLAY; Moderate yellowish brown with rust mottling; moist
20				Temporary 1" dia well screen	CL	20.0-24.0' SILTY CLAY; As above (15.0-20.0')
						24.0-24.5' SAND; Moderate yellowish brown; fine grained; wet.
	OHM-2-24' @ 1:35 pm (water)					24.5-25.0' SILTY CLAY; As above (15.0-20.0')
25					SP CL	

Well Construction Details: NA

Well Depth: _____ (feet); PVC I.D.: _____ (inches); PVC Schedule: _____ ;


Screen Interval: _____ to _____ feet, bgs; Slot Size _____ (inch);

Sand (Type: _____); Placed _____ to _____ feet, bgs;

Bentonite (Type: _____); Placed _____ to _____ feet, bgs;

Cement Grout tremied: _____ to _____ feet, bgs.

COMMENTS: clear, breezy ~68° F

 E2C Remediation
1020 Winding Creek Road., Suite 110
Roseville, California 95678

Phone: (916) 782-8700
Fax: (916) 782-8049

BORING/WELL NAME:
OHM-2

FIELD LOCATION OF BORING: OHM-3 located near southeastern corner of 710-714 Madison building. PAGE 1 OF 1

PROJECT NUMBER: 1973BK DATES DRILLED: 5-11-11
 CLIENT: DRILLER: PeneCore
 SITE ADDRESS: 712 Madison Fallsfield, CA LOGGED BY: D. Hidalgo

DRILLING METHOD AND EQUIPMENT: Hand Auger and Geoprobe
 BORING DIAMETER: 3 (inches) BORING DEPTH: 25 (feet)

WATER LEVEL	
DATE	
TIME	

Depth (Feet)	SAMPLE NAME	Blow Count	PID	WELL/BORING DIAGRAM	USCS Symbol	SOIL DESCRIPTION
						0.0-0.5 ASPHALT and BASE ROCK
	OHM-3; soil vapor sample @ 11:46am			Temporary Soil vapor well OHM-3		Boring hand augered 0.5-5.0'
5	OHM-3; 3-3.5 (soil) @ 12:50pm				CL	0.5-5.0' CLAYEY TYPE SOIL 5.0-6.0' SILTY CLAY: Moderate Yellowish Brown; moist
			660			6.0-8.0' SILTY CLAY: Olive Gray; moist.
10	OHM-3; 7-7.5 (soil) @ 1:59pm					8.0-10.0' SILTY CLAY: Moderate Yellowish Brown; moist.
					CL	10.0-15.0' SILTY CLAY: Moderate Yellowish Brown with some organic matter; moist
15					CL	15.0-20.0' SILTY CLAY: Moderate Yellowish Brown; moist ~ 17.9' thin silt (ML) layer; wet ~ 19.0' thin silt (ML) layer; wet ~ 19.9' thin silt (ML) layer; wet
20						20.0-25.0' CLAYEY SILT to SILTY CLAY: pale Brown to Moderate Yellowish Brown; moist to very moist.
25	OHM-3-25' @ 3:55p (water)			Temporary 1" dia well screen for grab water sample	ML / CL	

Well Construction Details: NA
 Well Depth: _____ (feet); PVC I.D.: _____ (inches); PVC Schedule: _____;
 Screen Interval: _____ to _____ feet, bgs; Slot Size _____ (inch);
 Sand (Type: _____); Placed _____ to _____ feet, bgs;
 Bentonite (Type: _____); Placed _____ to _____ feet, bgs;
 Cement Grout tremied: _____ to _____ feet, bgs.

COMMENTS: clear, breezy ~68° F



E2C Remediation

1020 Winding Creek Road., Suite 110
 Roseville, California 95678

Phone: (916) 782-8700
 Fax: (916) 782-8049

BORING/WELL NAME:

OHM-3

FIELD LOCATION OF BORING: OHM-4 located near northeastern corner of 710-714 Madison building

PROJECT NUMBER: 1973BK DATES DRILLED: 5-11-11
 CLIENT: _____ DRILLER: Pen e Core
 SITE ADDRESS: 712 Madison
Fairfield, CA LOGGED BY: D. Hidalgo


DRILLING METHOD AND EQUIPMENT: Hand Auger and GeoProbe
 BORING DIAMETER: 3 (inches) BORING DEPTH: 25 (feet)

WATER LEVEL	
DATE	
TIME	

Depth (Feet)	SAMPLE NAME	Blow Count	PID	WELL/ BORING DIAGRAM	USCS Symbol	SOIL DESCRIPTION
						0.0-0.5' ASPHALT and BASE ROCK
	OHM-4; Soil Vapor sample @ 10:47am			Temporary Soil Vapor well OHM-4		Boring hand augered 0.0-5.0'
5	OHM-4; 3-2a5 (soil) @ 11:10am					0.5-5.0' CLAYEY TYPE SOIL
						5.0-9.0' SILTY CLAY/CLAYEY SILT: Moderate Yellowish Brown; moist
					CL	9.0-10.0' SILTY CLAY: Moderate Yellowish Brown; moist
10					ML	10.0-11.0' CLAYEY SILT: Pale Brown; very moist
						11.0-15.0' SILTY CLAY: Pale Brown to Orangeish Brown; occasional charcoal; damp to very moist
15					CL	15.0-19.0' SILTY CLAY: As above (11.0-15.0')
						19.0-22.5' CLAYEY SILT: Pale Brown to Orangeish Brown; moist
20					ML	22.5-23.0' SILTY CLAY: Pale Brown to Moderate Yellowish Brown; moist
				Temporary 1" dia well screen for grab water sample		23.0-23.5' SILTY SAND: Dark Yellowish Brown ~60-70% fine grained sand; moist
	OHM-4-25' @ 5:15 pm (water)				CL	23.5-23.8' SILT: Mod Yell Brn; moist
					SM	23.8-24.2' SILTY SAND: Same as 23.0-23.5'
25					CL	24.2-25.0' SILTY CLAY: Mod Yell. Brn. dark Brown specs; moist

Well Construction Details: NA
 Well Depth: _____ (feet); PVC I.D.: _____ (inches); PVC Schedule: _____;
 Screen Interval: _____ to _____ feet, bgs; Slot Size _____ (inch);
 Sand (Type: _____); Placed _____ to _____ feet, bgs;
 Bentonite (Type: _____); Placed _____ to _____ feet, bgs;
 Cement Grout tremied: _____ to _____ feet, bgs.

COMMENTS: clear, breezy
~68°F

 **E2C Remediation**
 1020 Winding Creek Road., Suite 110
 Roseville, California 95678

Phone: (916) 782-8700
 Fax: (916) 782-8049

BORING/WELL NAME:
OHM-4

APPENDIX B

CLS Analytical Laboratory Reports and Sample Container Clean Certificates

PRECLEANED CERTIFIED

Certificate of Compliance

The enclosed containers have been chemically cleaned by using the standard USEPA cleaning procedure for low level chemical analysis. Representative containers have been tested by independent certified laboratories for their appropriate use. ESS containers meet and exceed the required detection limits established by the USEPA SPECIFICATIONS AND GUIDANCE FOR CHEMICAL ANALYSIS OF AIR SAMPLE CONTAINERS (OWTR Directive #92-010-05A).

EXTRACTABLE ORGANIC CONCENTRATIONS (EQUISCREEN 1)											
Analyte	Quantitation Limit (ug/l)	Alpha-Chlordane	<0.005	4-Tolylphenol	<0.1	2-Nitroanisole	<0.1	Anthracene	<0.1		
PESTICIDES/PCB'S	Alpha-BHC	<0.005	Gamma-Chlordane	<0.005	NH-1,1,1-trichloro-2,2,2-trifluoroethane	<0.1	Dimethylphthalate	<0.1	Bis(2-Ethylhexyl)phthalate	<0.2	
	beta-BHC	<0.005	Toxaphene	<0.005	Hexachlorocyclopentadiene	<0.1	Acenaphthylene	<0.2	Fluorenone	<0.1	
	gamma-BHC	<0.005	Aroclor-1016	<0.2	Hexachlorobenzene	<0.1	2,6-Dinitrotoluene	<0.1	Pyrene	<0.15	
	Delta-BHC	<0.005	Aroclor-1221	<0.2	Isophthalene	<0.1	2-Nitroanisole	<0.1	Benzo[a]pyrene	<0.1	
	Chlordane	<0.005	Aroclor-1232	<0.2	2-Nitrophenol	<0.1	Acenaphthene	<0.2	1,2-Dichlorobenzene	<0.1	
	Endosulfan (Endosul)	<0.005	Aroclor-1242	<0.2	2,4-Dimethylphenol	<0.1	2,4-Dinitrophenol	<0.1	1,2-Dichloroethane	<0.1	
	Heptachlor	<0.005	Aroclor-1248	<0.2	2,4-Dichlorophenyl methyl ether	<0.1	2,4,6-Trinitrophenol	<0.1	1,2-Dichloroethane	<0.1	
	Heptachlor Epoxide	<0.005	Aroclor-1254	<0.1	2,4-Dichlorophenol	<0.1	Dibenzofuran	<0.1	1,2-Dichlorobenzene	<0.1	
	Endosulfan I	<0.005	Aroclor-1260	<0.2	1,3,4-Trichlorobenzene	<0.1	2,4-Dinitroanisole	<0.1	Benzo[b]fluoranthene	<0.15	
	Endosulfan II	<0.005	Aroclor-1262	<0.2	Methylphenol	<0.1	Dicyclophthalate	<0.1	Chrysene	<0.1	
1,1'-DDE	<0.005	Aroclor-1268	<0.2	2-Chloroaniline	<0.1	2-Chlorophenyl Phenylether	<0.1	Bis(2-Ethylhexyl) Phthalate	<0.1		
1,1'-DDD	<0.005	SEMIVOLATILES	<0.2	Hexachlorobenzene	<0.1	Fluorene	<0.2	Di-n-Octylphthalate	<0.1		
1,1'-DDB	<0.005		Methyl	<0.1	2-Chloro-2,4-Dichlorophenol	<0.1	4-Nitroanisole	<0.1	Benzo[e]fluoranthene	<0.15	
1,1'-DDT	<0.005		Hex(2-Chloroethyl) ether	<0.1	Hexachlorocyclopentadiene	<0.1	4,6-Dinitro-2-Methylphenol	<0.1	Benzo[k]fluoranthene	<0.15	
1,1'-DDT	<0.005		Hex(1,2-Chloroethyl) ether	<0.1	Hexachlorocyclopentadiene	<0.1	2,4,6-Trinitrophenol	<0.1	Benzo[a]anthracene	<0.15	
1,1'-DDD	<0.005		2-Chlorophenol	<0.1	2,4,6-Trinitrophenol	<0.1	4-Bromophenyl Phenylether	<0.1	Dibenz[a,h]anthracene	<0.15	
1,1'-DDD	<0.005		1-Methylphenol	<0.1	1,2-Dichloroethane	<0.1	Hexachlorobenzene	<0.1	Benzo[g]perylene	<0.15	
1,1'-DDD	<0.005		2,2'-Dioxin	<0.1	2-Chloroaniline	<0.1	Hexachlorophenol	<0.1	Benzo[b]perylene	<0.15	
1,1'-DDD	<0.005		1,1'-Dichloropropane	<0.1	2-Chloroaniline	<0.1	Phenanthrene	<0.2	Benzo[k]perylene	<0.15	
1,1'-DDD	<0.005										
1,1'-DDD	<0.005										
1,1'-DDD	<0.005										

VOLATILE ORGANIC COMPOUNDS (VOC'S) (EQUISCREEN 2)											
Analyte	Quantitation Limit (ug/l)	Chlorobenzene	<0.1	1,1-Dichloroethane	<0.1	4-Bromophthalene	<0.1	Anthracene	<0.1		
Acetone	<0.2	Chloroethane	<0.1 <td>1,1-Dichloroethane <td><0.1 <td>Acetylene Chloride</td> <td><0.2</td> <td>1,2-Dichlorobenzene</td> <td><0.1</td> </td></td>	1,1-Dichloroethane <td><0.1 <td>Acetylene Chloride</td> <td><0.2</td> <td>1,2-Dichlorobenzene</td> <td><0.1</td> </td>	<0.1 <td>Acetylene Chloride</td> <td><0.2</td> <td>1,2-Dichlorobenzene</td> <td><0.1</td>	Acetylene Chloride	<0.2	1,2-Dichlorobenzene	<0.1		
Benzene	<0.1	1,2-Dichloroethane <td><0.1</td> <td>1,1-Dichloroethane <td><0.1</td> <td>Diethyl ether <td><0.2</td> <td>1,2,4-Trichlorobenzene</td> <td><0.1</td> </td></td>	<0.1	1,1-Dichloroethane <td><0.1</td> <td>Diethyl ether <td><0.2</td> <td>1,2,4-Trichlorobenzene</td> <td><0.1</td> </td>	<0.1	Diethyl ether <td><0.2</td> <td>1,2,4-Trichlorobenzene</td> <td><0.1</td>	<0.2	1,2,4-Trichlorobenzene	<0.1		
Bromobenzene	<0.1	2-Chloroanisole <td><0.1</td> <td>1,1,1-Trichloroethane <td><0.1</td> <td>Propylbenzene <td><0.1</td> <td>1,2,4-Trichlorobenzene</td> <td><0.1</td> </td></td>	<0.1	1,1,1-Trichloroethane <td><0.1</td> <td>Propylbenzene <td><0.1</td> <td>1,2,4-Trichlorobenzene</td> <td><0.1</td> </td>	<0.1	Propylbenzene <td><0.1</td> <td>1,2,4-Trichlorobenzene</td> <td><0.1</td>	<0.1	1,2,4-Trichlorobenzene	<0.1		
Bromoform	<0.1	2,4-Dichlorobenzene <td><0.1</td> <td>1,1,1-Trichloroethane <td><0.1</td> <td>Styrene</td> <td><0.1</td> <td>1,3,5-Trichlorobenzene</td> <td><0.1</td> </td>	<0.1	1,1,1-Trichloroethane <td><0.1</td> <td>Styrene</td> <td><0.1</td> <td>1,3,5-Trichlorobenzene</td> <td><0.1</td>	<0.1	Styrene	<0.1	1,3,5-Trichlorobenzene	<0.1		
Bromochloroethane	<0.1	Chloroform <td><0.1</td> <td>1,1,1-Trichloroethane <td><0.1</td> <td>1,1,1-Trichloroethane <td><0.1</td> <td>Vinyl Acetate</td> <td><0.5</td> </td></td>	<0.1	1,1,1-Trichloroethane <td><0.1</td> <td>1,1,1-Trichloroethane <td><0.1</td> <td>Vinyl Acetate</td> <td><0.5</td> </td>	<0.1	1,1,1-Trichloroethane <td><0.1</td> <td>Vinyl Acetate</td> <td><0.5</td>	<0.1	Vinyl Acetate	<0.5		
Bromodichloroethane <td><0.1</td> <td>Dibromomethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>Vinyl Chloride</td> <td><0.1</td> </td></td></td>	<0.1	Dibromomethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>Vinyl Chloride</td> <td><0.1</td> </td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>Vinyl Chloride</td> <td><0.1</td> </td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>Vinyl Chloride</td> <td><0.1</td>	<0.1	Vinyl Chloride	<0.1		
Bromochloropropane <td><0.1</td> <td>1,1-Dibromo-2,2-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td></td>	<0.1	1,1-Dibromo-2,2-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td>	<0.1	1,2-Dichloroethane <td><0.1</td>	<0.1		
Bromodichloropropane <td><0.1</td> <td>1,1-Dibromo-1,1-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td></td>	<0.1	1,1-Dibromo-1,1-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td>	<0.1	1,2-Dichloroethane <td><0.1</td>	<0.1		
Bromotrichloropropane <td><0.1</td> <td>1,1-Dibromo-2,2-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td></td>	<0.1	1,1-Dibromo-2,2-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td>	<0.1	1,2-Dichloroethane <td><0.1</td>	<0.1		
Carbon Tetrachloride <td><0.1</td> <td>1,1-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td></td>	<0.1	1,1-Dichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td>	<0.1	1,2-Dichloroethane <td><0.1</td>	<0.1		
Carbon Disulfide <td><0.1</td> <td>Dichlorodifluoromethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td></td>	<0.1	Dichlorodifluoromethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td></td>	<0.1	1,1,2-Trichloroethane <td><0.1</td> <td>1,2-Dichloroethane <td><0.1</td> </td>	<0.1	1,2-Dichloroethane <td><0.1</td>	<0.1		

METALS, CYANIDE, SULFIDE, CHLORIDE (EQUISCREEN 3)											
Analyte	Detection Limit (ug/l)	Beryllium	<0.01	Cadmium	<0.05	Lead	<0.05	Nickel	<0.05	Vanadium	<0.1
Asbestos	<0.5	Cadmium	<0.05	Cadmium	<0.05	Lead	<0.05	Potassium	<0.5	Zinc	<0.2
Barium	<0.05	Calcium	<0.5	Calcium	<0.5	Magnesium	<0.1	Selenium	<0.5	Cyanide	<0.1
Copper	<0.05	Chromium	<0.05	Chromium	<0.05	Manganese	<0.1	Silver	<0.05	Fluoride	100
Iron	<0.05	Cobalt	<0.05	Cobalt	<0.05	Vanadium	<0.1	Sodium	<0.5	Nitrite + Nitrate	<0.1
Manganese	<0.05	Copper	<0.05	Copper	<0.05	Mercury	<0.05	Zinc	<0.05		



www.essvial.com

ON-TIME PRODUCTS FOR ENVIRONMENTAL SAMPLING & ANALYSIS

For more information on our cleaning & monitoring procedures, please call

1-800-233-9425

Matthew Macy, Vice President ESS Inc.

120210



Scientific Products LLC
Where clean is critical

36 E. B.J. Tunnell Blvd.
Miami, OK 74354

Dear Customer:

The purpose of this letter is to ensure that you have a complete understanding of EP Scientific Products procedures and quality assurance for Level I preserved containers.

EP Scientific Products quality assurance extends beyond the analytical testing of the pre-cleaned bottles, to the point where we analyze all incoming acids for the analytes which the acid is destined to preserve. We also analyze any dilution we manufacture, such as 1:1 HNO₃: which is used for metals preservation. We also check the preservative in the sample bottle, so you will have assurance that the product you purchase is of the highest quality.

The container Preserving Procedures are as follows:

- Under a fume hood, closure is removed from certified containers to deliver reagent and replaced.
- Color coded paper seal with reagent identification is attached between closure and body of container.
- Certification of container and certification of reagent is included with each case of product, M.S.D.S. is enclosed, and box is custody sealed.

In the past, we have conducted analytical tests with preserved containers stored for two years and found no contamination. As long as the following conditions are met, EP Scientific Products will guarantee the preservative up to one year from the date preserved or the expiration date located on the catalog label. The container is stored upright at room temperature without exposure to contaminants (propane fumes, solvents, pesticides, etc.).

EP Scientific Products' goal is to serve the environmental industry with total integrity. If you have any questions about preserved products, contact our Technical Services for assistance at 800-331-7425 ext. 181. Please refer to the date and/or expiration date on the catalog label for traceability.

(918) 542-1801

Fax (918) 540-1659



QA.57
Rev. 0
12/26/07

Scientific Products
Where clean is critical

36 E. B.J. Tunnell Blvd.
Miami, OK 74354

Certificate of Analysis

QA LEVEL I LOT NO B0265120
DESCRIPTION 40mL Clear w/cap
VOLATILES QUALITY ASSURANCE

EP Scientific Level I products have been tested and found to comply with or to be lower than the EPA detection limits as stated in OSWER Directive # 9240.0-05A "Specifications And Guidance For Contaminant-Free Sample Containers 12/92".

Compound	Quantitation Limit (µg/L)	Compound	Quantitation Limit (µg/L)
Acetone	< 5.0	Ethylbenzene	< 0.5
Acrylonitrile	< 1.0	Hexachlorobutadiene	< 0.5
Benzene	< 0.5	2-Hexanone	< 5.0
Bromobenzene	< 0.5	Iodomethane	< 0.5
Bromochloromethane	< 0.5	Isopropylbenzene	< 0.5
Bromodichloromethane	< 0.5	m+p Xylenes	< 0.5
Bromoform	< 0.5	4-Methyl-2-pentanone	< 5.0
Bromomethane	< 0.5	Methyl t-butylether (MTBE)	< 0.5
2-Butanone	< 5.0	Naphthalene	< 0.5
Carbon Disulfide	< 0.5	n-Butylbenzene	< 0.5
Carbon Tetrachloride	< 0.5	Nitrobenzene	< 0.5
Chlorobenzene	< 0.5	n-Propylbenzene	< 0.5
Chloroethane	< 0.5	o-Xylene	< 0.5
Chloroform	< 0.5	p-Isopropyltoluene	< 0.5
Chloromethane	< 0.5	sec-Butylbenzene	< 0.5
2-Chlorotoluene	< 0.5	Styrene	< 0.5
4-Chlorotoluene	< 0.5	tert-Butylbenzene	< 0.5
cis-1,2-Dichloroethene	< 0.5	Tertiary amyl methyl ether (TAME)	< 3.0
cis-1,3-Dichloropropene	< 0.5	Tertiary butyl alcohol (TBA)	< 2.0
1,2-Dibromo-3-chloropropane	< 0.02	1,1,2,2-Tetrachloroethane	< 0.5
Dibromochloromethane	< 0.5	Tetrachloroethene	< 0.5
1,2-Dibromoethane (EDB)	< 0.01	Toluene	< 0.5
Dibromomethane	< 0.5	trans-1,2-Dichloroethene	< 0.5
1,2-Dichlorobenzene	< 0.5	trans-1,3-Dichloropropene	< 0.5
1,3-Dichlorobenzene	< 0.5	1,1,2-Trichloro-1,2,2 Trifluoroethane (Freon 113)	< 0.5
1,4-Dichlorobenzene	< 0.5	1,2,3-Trichlorobenzene	< 0.5
Dichlorodifluoromethane (Freon-12)	< 0.5	1,2,4-Trichlorobenzene	< 0.5
1,1-Dichloroethane	< 0.5	1,1,1-Trichloroethane	< 0.5
1,2-Dichloroethane	< 0.5	1,1,2-Trichloroethane	< 0.5
1,1-Dichloroethene	< 0.5	Trichloroethene	< 0.5
Dichloromethane	< 0.5	Trichlorofluoromethane	< 0.5
1,2-Dichloropropane	< 0.5	1,2,3-Trichloropropane	< 0.5
1,3-Dichloropropane	< 0.5	1,2,4-Trimethylbenzene	< 0.5
2,2-Dichloropropane	< 0.5	1,3,5-Trimethylbenzene	< 0.5
1,1-Dichloropropene	< 0.5	Vinyl Acetate	< 0.5
Ethyl tertiary butyl ether (ETBE)	< 3.0	Vinyl Chloride	< 0.5
<i>Octa methyl cyclo tetrasiloxane</i>	< 5.0	<i>Deca methyl cyclo pentasiloxane</i>	< 5.0

In addition to the above analytes, 20mL, 40 mL and 60 mL vials are certified for:

Compound	Quantitation Limit (µg/L)
Total Organic Carbon	<600

If EP Scientific can be of any further assistance, please call (800) 331-7425 and ask for our technical service department.

Approved By

Kim Meeks 12-4-11

Kim Meeks
Quality Assurance



Preserved with
1%
Hydrochloric Acid
Warning!
See MSDS
EXP.
02/07/12
LOT HA 1088200
SERIAL BP 47495
Contains Hydrochloric Acid



Scientific Products LLC
Where clean is critical

200 B.J. Tunnell Blvd.
Miami, OK 74354

QA-91
Rev. 0
4/8/08

CERTIFICATE OF ANALYSIS

Identification Hydrochloric Acid LOT NO. 4110040
DESCRIPTION 1:1 HCL

VOLATILES QUALITY ASSURANCE

ANALYTE	CONTRACT REQUIRED QUANTITION LIMIT (ug/L)
Chloromethane	< 1
Bromomethane	< 1
Vinyl chloride	< 1
Chloroethane	< 1
Methylene chloride	< 2
Acetone	< 5
Carbon disulfide	< 1
1,1-Dichloroethene	< 1
1,1-Dichloroethane	< 1
cis-1,2-Dichloroethene	< 1
trans-1,2-Dichloroethene	< 1
Chloroform	< 1
1,2-Dichloroethane	< 1
2-Butanone	< 5
Bromochloromethane	< 1
1,1,1-Trichloroethane	< 1
Carbon tetrachloride	< 1
Bromodichloromethane	< 1
1,2-Dichloropropane	< 1
cis-1,3-Dichloropropene	< 1

ANALYTE	CONTRACT REQUIRED QUANTITION LIMIT (ug/L)
Trichloroethene	< 1
Dibromochloromethane	< 1
1,1,2-Trichloroethane	< 1
Benzene	< 1
trans-1,3-Dichloropropene	< 1
Bromoform	< 1
4-Methyl-2-pentanone	< 5
2-Hexanone	< 5
Tetrachloroethene	< 1
1,1,2,2-Tetrachloroethane	< 1
1,2-Dibromoethane	< 1
Toluene	< 1
Chlorobenzene	< 1
Ethylbenzene	< 1
Styrene	< 1
Xylenes (total)	< 1
1,3-Dichlorobenzene	< 1
1,4-Dichlorobenzene	< 1
1,2-Dichlorobenzene	< 1
1,2-Dibromo-3-chloropropane	< 1

Observed with
Hydrochloric Acid
Warning!
See MSDS
EXP.
02/07/12
LOT HA 1090200
SERIAL BP 47994

This is to certify that this lot was tested and found to comply with EP Scientific Products Specifications for this product.

Approved By Kim Meeks 11-12-10

Kim Meeks
Quality Assurance



ACC# 89989

Print Date: 1/25/07
Revision Date: 1/25/2007
Version: 5**Material Safety Data Sheet**
Hydrochloric Acid 18%**Section 1 - Chemical Product and Company Identification****MSDS Name:**

Hydrochloric Acid 18% Solution

Catalog Numbers:ACH-5-1; ACH-1-1; ACH-2-1; ACH-3-1; PP112-01A3HA; PP113-500A3HA; PP140-40C 2HA
PP140-40CDB.2HA; PP140-40CEP.2HA; PP141-40A.2HA; PP141-40ADB.2HA; PP141-40AEP.2HA
SVCH-5-1; SVCH-1-1; SVCH-2-1; SVCH-3-1**Synonyms:**

Muratic acid; Chlorohydric acid; Hydrogen chloride; Spirits of salt

Company Identification:EP Scientific Products - ThermoFisher Scientific
35 # BJ Tunnel Blvd.
Miami, OK 74354**Company Phone Number:**

1-800-331-7425

Emergency Phone Number:CHEMTREC Phone Number, US: (800) 424-9300
CHEMTREC Phone Number, Europe: (202) 483-7616**Section 2 - Composition, Information on Ingredients**

CAS#	Chemical Name:	Percent	EINECS/ ELINCS	Hazard Symbols	Risk Phrases
7647-01-0	Hydrogen chloride	18.0	231-595-7	C	34-37
7732-18-5	Water	82	231-791-2		

Section 3 - Hazards Identification**EMERGENCY OVERVIEW***Appearance: Colorless to slight yellow clear liquid**Warning! Causes irritation and possible burns by all routes of exposure. May be harmful if swallowed or inhaled. Repeated or prolonged exposure may cause erosion of exposed teeth. Corrosive to metal.**Target Organs: Respiratory system, Teeth, Eyes, Skin***Potential Health Effects****Eye:**

Vapor or mist may cause irritation and severe burns. May cause painful sensitization to light. Causes eye irritation and possible burns.

Page 1

ACC# 89989

Print Date: 1/25/07
Revision Date: 1/25/2007
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Hydrochloric Acid 18%**Skin:**

Causes skin irritation and possible burns.

Ingestion:

May cause corrosion and permanent tissue destruction of the esophagus and digestive tract. Causes digestive tract irritation with possible burns.

Inhalation:

Exposure to the mist and vapor may erode exposed teeth. Causes respiratory tract irritation with possible burns.

Chronic:

Repeated exposure may cause erosion of teeth. Prolonged exposure may cause conjunctivitis, photosensitization, and possible blindness. Repeated exposure to low concentrations of HCl vapor or mist may cause bleeding of nose and gums. Chronic bronchitis and gastritis have also been reported.

Section 4 - First Aid Measures**Eyes:**

Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting the upper and lower eyelids. Get medical aid immediately.

Skin:

Get medical aid immediately. Immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes.

Ingestion:

Do not induce vomiting. If victim is conscious and alert, give 2-4 cupfuls of milk or water. Get medical aid immediately.

Inhalation:

Get medical aid immediately. Remove from exposure and move to fresh air immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen.

Notes to Physician:

Do NOT use sodium bicarbonate in an attempt to neutralize the acid.

Antidote:

Do NOT use oils or ointments in eye.

Section 5 - Fire Fighting Measures**General Information:**

As in any fire, wear a self-contained breathing apparatus in pressure-demand, MSHA/NIOSH (approved or equivalent), and full protective gear. Water runoff can cause environmental damage. Dike and collect water used to fight fire. During a fire, irritating and highly toxic gases may be generated by thermal decomposition or combustion. Not flammable, but reacts with most metals to form flammable hydrogen gas. Use water spray to keep fire-exposed containers cool. Vapors may be heavier than air. They can spread along the ground and collect in low or confined areas. Containers may explode when heated.

Extinguishing Media:

Substance is nonflammable, use agent most appropriate to extinguish surrounding fire.

Autoignition Temperature:

Not applicable.

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ACC# 89989

Print Date: 1/25/07
Revision Date: 1/25/2007
Version: 5**Material Safety Data Sheet**
Hydrochloric Acid 18%**Explosion Limits:**

Lower: Not available Upper: Not available

Flash Point:

Not applicable.

NFPA Rating:

(estimated) Health: 3; Flammability: 0; Instability: 0

Section 6 - Accidental Release Measures**General Information:**

Use proper personal protective equipment as indicated in Section 8

Spills/Leaks:

Large spills may be neutralized with dilute alkaline solutions of soda ash (sodium carbonate, Na₂CO₃) or lime (calcium oxide, CaO). Avoid runoff into storm sewers and ditches which lead to waterways. Clean up spills immediately, observing precautions in the Protective Equipment section. Remove all sources of ignition. Provide ventilation. Do not get water inside containers. A vapor suppressing foam may be used to reduce vapors. Cover with dry earth, dry sand, or other non-combustible material followed with plastic sheet to minimize spreading and contact with water.

Section 7 - Handling and Storage**Handling:**

Wash thoroughly after handling. Remove contaminated clothing and wash before reuse. Use only in a well-ventilated area. Contents may develop pressure upon prolonged storage. Do not breathe dust, mist, or vapor. Do not get in eyes, on skin, or on clothing. Keep container tightly closed. Do not ingest or inhale. Discard contaminated shoes. Use caution when opening.

Storage:

Store in a cool, dry, well-ventilated area away from incompatible substances. Corrosives area. Do not store in metal containers. Store away from alkalies.

Section 8 - Exposure Controls, Personal Protection**Engineering Controls:**

Facilities storing or utilizing this material should be equipped with an eyewash facility and a safety shower. Use adequate general or local exhaust ventilation to keep airborne concentrations below the permissible exposure limits.

Exposure Limits

Chemical Name:	ACGIH	NIOSH	OSHA
Hydrogen chloride	2 ppm Ceiling	50 ppm IDLH; 5 ppm Ceiling; 7 mg/m ³ Ceiling	5 ppm Ceiling; 7 mg/m ³ Ceiling
Water	None listed	None listed	None listed

OSHA Vacated PELs**Personal Protective Equipment**

ACC# 89989

Print Date: 1/25/07
Revision Date: 1/25/2007
Version: 5**Material Safety Data Sheet**
Hydrochloric Acid 18%**Eyes:**

Wear chemical splash goggles and face shield.

Skin:

Wear neoprene or polyvinyl chloride gloves to prevent exposure.

Clothing:

Wear appropriate protective clothing to prevent skin exposure.

Respirators: Follow the OSHA respirator regulations found in 29 CFR 1910.134 or European Standard EN 149 L or European Standard EN 149 approved respirator if exposure limits are exceeded or if irritation or other symptoms experienced.

Section 9 - Physical and Chemical Properties**Physical State:** Clear liquid**Color:** Colorless to slight yellow**Odor:** Strong, pungent**pH:** 0.01**Vapor Pressure:** 5.7 mm Hg @ 0°C**Vapor Density:** 1.26**Evaporation Rate:** > 1.00 (N-butyl acetate)**Viscosity:** No information found**Boiling Point:** 81.5-110°C @ 760 mmHg**Freezing/Melting Point:** -74°C**Decomposition Temperature:** No information found**Solubility in water:** Miscible.**Specific Gravity/Density:** 1.0-1.2**Molecular Formula:** HCl.H₂O**Molecular Weight:** 36.45**Section 10 - Stability and Reactivity****Chemical Stability:**

Stable under normal temperatures and pressures

Conditions to Avoid:

Incompatible materials, excess heat

Incompatibilities with Other Materials

Bases, acetic anhydride, alkali metals, aluminum, amides, copper, copper alloys, fluorine, iron, sodium hydroxide, steel, sulfuric acid, vinyl acetate, zinc, potassium permanganate, cesium acetylene carbide, rubidium acetylene carbide, rubidium carbide, sodium, chlorosulfonic acid, oleum, carbonates, perchloric acid, calcium phosphide, metal oxides, acetates, cesium carbide, beta-propiolactone, ethylenimine, propylene oxide, lithium silicides, alcohols + hydrogen cyanide, 2-aminoethanol, ammonium hydroxide, calcium carbide, 1,1-difluoroethylene, ethylene diamine, magnesium boride, mercuric sulfate, uranium phosphide

Hazardous Decomposition Products

Hydrogen chloride, chlorine, carbon monoxide, carbon dioxide, hydrogen gas

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Print Date: 1/25/07
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Version: 5**Material Safety Data Sheet**
Hydrochloric Acid 18%**Hazardous Polymerization**

Will not occur.

Section 11 - Toxicological Information**RTECS:**CAS# 7647-01-0: MW4025000; MW4031000
CAS# 7732-18-5: ZC0110000**LD50/LC50:**CAS# 7647-01-0:
Inhalation, mouse: LC50 = 1108 ppm/1H
Inhalation, mouse: LC50 = 20487 mg/m³/5M
Inhalation, mouse: LC50 = 3940 mg/m³/30M
Inhalation, mouse: LC50 = 8300 mg/m³/30M
Inhalation, rat: LC50 = 3124 ppm/1H
Inhalation, rat: LC50 = 60938 mg/m³/5M
Inhalation, rat: LC50 = 7004 mg/m³/30M
Inhalation, rat: LC50 = 45000 mg/m³/5M
Inhalation, rat: LC50 = 8300 mg/m³/30M
Oral, rabbit: LD50 = 900 mg/kg.
CAS# 7732-18-5:
Oral, rat: LD50 = >80 mL/kg.**Carcinogenicity:**CAS# 7647-01-0: Not listed as a carcinogen by ACGIH, IARC, NTP, or CA Prop 65
CAS# 7732-18-5: Not listed as a carcinogen by ACGIH, IARC, NTP, or CA Prop 65**Epidemiology:**

Experimental reproductive effects have been reported.

Teratogenicity:Female rats were exposed to 450 mg/m³ of HCl for 1 hour either prior to mating or on day 9 of pregnancy. Developmental effects were observed in the offspring. However, this exposure caused toxic effects, including mortality, in the mothers.**Reproductive:**

No information available.

Mutagenicity:

Cytogenetic analysis: Hamster, lung = 30 mmol/L; Cytogenetic analysis: Hamster, ovary = 8 mmol/L.

Neurotoxicity:

No information available.

Other:

See actual entry in RTECS for complete information.

Section 12 - Ecological Information**Ecotoxicity:**Fish: Bluegill/Sunfish: 3.6 mg/L; 48Hr; Lethal (unspecified)
Fish: Bluegill/Sunfish: LC50; 96 Hr; pH 3.0-3.5

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Print Date: 1/25/07
Revision Date: 1/25/2007
Version: 5**Material Safety Data Sheet**
Hydrochloric Acid 18%**Environmental:**

Rapidly hydrolyzes when exposed to water. Will exhibit extensive evaporation from soil surfaces. Upon transport through the soil, hydrochloric acid will dissolve some of the soil materials (especially those with carbonate bases) and the acid will neutralize to some degree.

Physical:

No information found.

Other:

No information found.

Section 13 - Disposal Considerations

Chemical waste generators must determine whether a discarded chemical is classified as a hazardous waste. US EPA guidelines for the classification determination are listed in 40 CFR Part 261.3. Additionally, waste generators must consult state and local hazardous waste regulations to ensure complete and accurate classification.

RCRA P Series Wastes

None of the components are on this list.

RCRA U Series Wastes

None of the components are on this list.

Section 14 - Transport Information

	US DOT	Canadian TDG
Proper Shipping Name:	HYDROCHLORIC ACID, SOLUTION	HYDROCHLORIC ACID, SOLUTION
Hazard Class:	II	B
UN Number:	UN1789	UN89
Packing Group:	II	II

USA RQ: CAS# 7647-01-0, 5000 lb final RQ, 2270 kg final RQ

Section 15 - Regulatory Information**US Federal****TSCA**CAS# 7647-01-0 is listed on the TSCA Inventory.
CAS# 7732-18-5 is listed on the TSCA Inventory.**Health and Safety Reporting List**

None of the components are on this list.

Chemical Test Rules

None of the components are on this list.

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Material Safety Data Sheet Hydrochloric Acid 18%

TSCA Section 12b

None of the components are on this list.

TSCA Significant New Use Rule (SNUR)

None of the components are on this list.

CERCLA Hazardous Substances and corresponding RQs

CAS# 7647-01-0: 5000 lb final RQ; 2270 kg final RQ

SARA Section 302 Extremely Hazardous Substances

CAS# 7647-01-0: 500 lb TPQ (gas only)

SARA Hazard Categories

CAS# 7647-01-0: immediate.

SARA Section 313

This material contains Hydrogen chloride (CAS# 7647-01-0, < 20.0%), which is subject to the reporting requirements of Section 313 of SARA Title III and 40 CFR Part 372

Clean Air Act - Hazardous Air Pollutants (HAPs)

CAS# 7647-01-0 is listed as a hazardous air pollutant (HAP).

Clean Air Act - Class 1 Ozone Depletors

None of the components are on this list.

Clean Air Act - Class 2 Ozone Depletors

None of the components are on this list.

Clean Water Act - Hazardous Substances

CAS# 7647-01-0 is listed as a Hazardous Substance under the CWA

Clean Water Act - Priority Pollutants

None of the components are on this list.

Clean Water Act - Toxic Pollutants

None of the components are on this list.

OSHA - Highly Hazardous

CAS# 7647-01-0 is considered highly hazardous by OSHA.

OSHA - Specifically Regulated Chemicals

None of the components are on this list.

US State

State Right to Know

Hydrogen chloride can be found on the following state Right-to-Know lists: California, New Jersey, Pennsylvania, Minnesota, Massachusetts
No information found

California Prop 65

None of the components are on this list

California No Significant Risk Level

None of the components are on this list
None of the components are on this list.

European/International Regulations

European Labelling in Accordance with EC Directives:

Hazard Symbols: Xi

ACC# 89989

Print Date: 1/25/07
Revision Date: 1/25/2007
Version: 5

Material Safety Data Sheet Hydrochloric Acid 18%

Risk Phrases: R 36/37/38 Irritating to eyes, respiratory system and skin.

Safety Phrases: S 26 In case of contact with eyes, rinse immediately with plenty of water and seek medical advice

S 45 In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible)

WGK (Water Danger/Protection)

No information found

United Kingdom Occupational Exposure Limits

No information found

United Kingdom Maximum Exposure Limits

No information found

Canadian DSL/NDSL

CAS# 7647-01-0 is listed on Canada's DSL List.

CAS# 7732-18-5 is listed on Canada's DSL List

Canadian WHMIS Classifications

This product has a WHMIS classification of E, D2A.

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all of the information required by those regulations.

Canadian Ingredient Disclosure List

CAS# 7647-01-0 is listed on the Canadian Ingredient Disclosure List.

Section 16 - Other Information

No information found

MSDS Creation Date: July 6, 1999

Revision Date: January 25, 2007

Revisions were made in Sections:

2, 3, 11, 14, 15

This MSDS is intended for review and guidance in the receipt, storage, handling, use and disposal of product purchased from us, and for no other purpose. Use this product only as directed and in accordance with applicable instructions and warnings provided with the product. Please consult your institution's policies regarding use of this product. If you have obtained this MSDS other than in connection with the supply of this product from us, this MSDS should be consulted for general information only, and should not be relied upon for any purpose. As with the use of all hazardous materials, you should in all instances follow the guidance of the MSDS provided or available with the specific product purchased.

Smart Chemistry Corporation

3402 La Grande Blvd, Sacramento, CA 95823, (916)991-3300, (916)991-3440 (fax), www.smartchemistry.com, jphsu@smartchemistry.com

Canister Certification by TO15

Client:
 Hydrogen Station at:
 Sample Type: Hydrogen Fuel
 Date Sampled:
 Date Received:
 Date Analyzed: 11/17/2010
 Time Analyzed: 8:13 pm

Field ID #: Sample Container#10
 Lab Sample ID:
 Concentration Units: PPBV
 Date File Location
 Data Filename: 10111703.D
 Dilution Factor: 1.0

7301

Analytes	MW	CASNUM	MQL (PPBV)	Results (PPBV)	Qualifier	MQL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-55-6	1	0	U	0.005	0
1,1,2,2-Tetrachloroethane	166	79-34-5	1	0	U	0.007	0
1,1,2-Trichloroethane	132	79-00-5	1	0	U	0.005	0
1,2-Dibromoethane	186	106-93-4	1	0	U	0.008	0
1,1-Dichloroethane	98	75-34-3	1	0	U	0.004	0
1,1-Dichloroethene	96	75-35-4	1	0	U	0.004	0
1,2,4-Trichlorobenzene	180	120-82-1	1	0	U	0.007	0
1,2,4-Trimethylbenzene	120	95-63-6	1	0	U	0.005	0
1,2-Dichloroethane	98	107-06-2	1	0	U	0.004	0
1,2-Dichloropropane	112	78-87-5	1	0	U	0.005	0
1,3,5-Trimethylbenzene	120	108-67-8	1	0	U	0.005	0
1,3-Butadiene	54	106-99-0	1	0	U	0.002	0
1,2-Dichlorobenzene	146	95-50-7	1	0	U	0.006	0
1,3-Dichlorobenzene	146	541-73-1	1	0	U	0.006	0
1,4-Dichlorobenzene	146	106-46-7	1	0	U	0.006	0
1,4-Dioxane	88	123-91-1	1	0	U	0.004	0
2-Butanone	72	78-93-3	1	0	U	0.003	0
2-Hexanone	100	591-78-6	1	0	U	0.004	0
4-Ethyltoluene	120	622-96-8	1	0	U	0.005	0
4-Methyl-2-Pentanone	100	108-10-1	1	0	U	0.004	0
Acetone	58	67-64-1	1	0	U	0.002	0
Benzene	78	71-43-2	1	0	U	0.003	0
Benzyl Chloride	126	100-44-7	1	0	U	0.005	0
Bromodichloromethane	162	75-27-4	1	0	U	0.007	0
Bromoform	250	75-25-2	1	0	U	0.01	0
Bromomethane	94	74-83-9	1	0	U	0.004	0
Carbon Disulfide	76	75-15-0	1	0	U	0.003	0
Carbon tetrachloride	152	56-23-5	1	0	U	0.005	0
Chlorobenzene	112	108-90-7	1	0	U	0.005	0
Chloroethane	64	75-00-3	1	0	U	0.003	0
Chloroform	118	67-66-3	1	0	U	0.005	0
Chloromethane	50	74-87-3	1	0	U	0.002	0
cis-1,2-dichloroethene	96	156-59-2	1	0	U	0.004	0
cis-1,3-Dichloropropene	110	10061-01-5	1	0	U	0.005	0
Cyclohexane	84	110-82-7	1	0	U	0.003	0
Dibromochloromethane	206	124-48-1	1	0	U	0.008	0
Dichlorodifluoromethane	120	75-71-8	1	0	U	0.005	0
Ethanol	46	64-17-5	1	0	U	0.002	0
Ethyl Acetate	88	141-78-6	1	0	U	0.004	0
Ethylbenzene	106	100-41-4	1	0	U	0.004	0
Freon 113	186	76-13-1	1	0	U	0.008	0
Freon 114	170	76-14-2	1	0	U	0.007	0
Heptane	100	142-82-5	1	0	U	0.004	0
Hexane	86	110-54-3	1	0	U	0.004	0
Hexachlorobutadiene	258	87-68-3	1	0	U	0.01	0
Isopropyl Alcohol	60	67-63-0	1	0	U	0.002	0
Methylene chloride	84	75-09-2	1	0	U	0.003	0
Methyl tert-Butyl Ether	88	1634-04-4	1	0	U	0.004	0
Propene	36	115-07-1	1	0	U	0.001	0
Styrene	104	100-42-5	1	0	U	0.004	0
Tetrachloroethene	164	127-18-4	1	0	U	0.007	0
Tetrahydrofuran	72	109-99-9	1	0	U	0.003	0
Toluene	92	108-88-3	1	0	U	0.004	0
trans-1,2-dichloroethene	96	156-60-5	1	0	U	0.004	0
trans-1,3-Dichloropropene	110	10061-02-6	1	0	U	0.005	0
Trichloroethene	130	79-03-6	1	0	U	0.005	0
Trichlorofluoromethane	136	75-69-4	1	0	U	0.006	0
Vinyl acetate	86	108-05-4	1	0	U	0.004	0
Vinyl chloride	62	75-01-4	1	0	U	0.003	0
Xylenes, m&p-	106	105-38-3 & 106-42-2	1	0	U	0.004	0
Xylenes, o-	106	95-47-6	1	0	U	0.004	0
Bromochloromethane (surrogate)	128	74-97-5	87	87	=		
4-BFB(surrogate)	174	460-00-3	98	98	=		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
 PPBV - Parts per billion volume. MQL - Method quantitation limit.
 Surrogate results are in units of percent recovery with control limits: 65 to 135%

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Canister Certification by TO15

Client:
 Hydrogen Station at:
 Sample Type: Hydrogen Pael
 Date Sampled:
 Date Received:
 Date Analyzed: 11082010
 Time Analyzed: 6.44 pm

Field ID #: Sample Container #12
 Lab Sample ID:
 Concentration Units: PPBV
 Date File Location
 Data Filename: 10110804.D
 Dilution Factor: 1.0

Analytes	MW	CASNUM	MOL (PPBV)	Results (PPBV)	Qualifier	MOL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-55-6	1	0	U	0.005	0
1,1,2,2-Tetrachloroethane	166	79-34-5	1	0	U	0.007	0
1,1,2-Trichloroethane	132	79-00-5	1	0	U	0.005	0
1,2-Dibromoethane	186	106-93-4	1	0	U	0.008	0
1,1-Dichloroethane	98	75-34-3	1	0	U	0.004	0
1,1-Dichloroethene	96	75-35-4	1	0	U	0.004	0
1,2,4-Trichlorobenzene	180	120-82-1	1	0	U	0.007	0
1,2,4-Trimethylbenzene	120	95-63-6	1	0	U	0.005	0
1,2-Dichloroethane	98	107-06-2	1	0	U	0.004	0
1,2-Dichloropropane	112	78-87-5	1	0	U	0.005	0
1,3,5-Trimethylbenzene	120	108-87-8	1	0	U	0.005	0
1,3-Butadiene	54	106-99-0	1	0	U	0.002	0
1,2-Dichlorobenzene	146	95-50-1	1	0	U	0.006	0
1,3-Dichlorobenzene	146	541-73-1	1	0	U	0.006	0
1,4-Dichlorobenzene	146	106-46-7	1	0	U	0.006	0
1,4-Dioxane	86	123-91-1	1	0	U	0.004	0
2-Butanone	72	78-93-3	1	0	U	0.003	0
2-Hexanone	100	591-78-6	1	0	U	0.004	0
4-Ethyltoluene	120	622-96-8	1	0	U	0.005	0
4-Methyl-2-Pentanone	100	108-10-1	1	0	U	0.004	0
Acetone	58	67-64-1	1	0	U	0.002	0
Benzene	78	71-43-2	1	0	U	0.003	0
Benzyl Chloride	126	109-44-7	1	0	U	0.005	0
Bromodichloromethane	162	75-27-4	1	0	U	0.007	0
Bromoform	250	75-25-2	1	0	U	0.01	0
Bromomethane	94	74-83-9	1	0	U	0.004	0
Carbon Disulfide	76	75-15-0	1	0	U	0.003	0
Carbon tetrachloride	152	56-23-5	1	0	U	0.006	0
Chlorobenzene	112	108-90-7	1	0	U	0.005	0
Chloroethane	64	75-00-3	1	0	U	0.003	0
Chloroform	118	67-66-3	1	0	U	0.005	0
Chloromethane	50	74-87-3	1	0	U	0.002	0
cis-1,2-dichloroethene	96	156-59-2	1	0	U	0.004	0
cis-1,3-Dichloropropene	110	10061-01-5	1	0	U	0.005	0
Cyclohexane	84	110-82-7	1	0	U	0.003	0
Dibromochloromethane	206	124-48-1	1	0	U	0.008	0
Dichlorodifluoromethane	128	75-71-8	1	0	U	0.005	0
Ethanol	46	64-17-5	1	0	U	0.002	0
Ethyl Acetate	88	141-78-6	1	0	U	0.004	0
Ethylbenzene	106	100-41-4	1	0	U	0.004	0
Freon113	186	76-13-1	1	0	U	0.008	0
Freon114	170	76-14-2	1	0	U	0.007	0
Heptane	100	142-82-5	1	0	U	0.004	0
Hexane	86	110-54-3	1	0	U	0.004	0
Hexachlorobutadiene	258	87-69-3	1	0	U	0.01	0
Isopropyl Alcohol	60	67-63-0	1	0	U	0.002	0
Methylene chloride	84	75-09-2	1	0	U	0.003	0
Methyl tert-Butyl Ether	88	1634-04-1	1	0	U	0.004	0
Propene	36	115-07-1	1	0	U	0.001	0
Styrene	104	100-42-5	1	0	U	0.004	0
Tetrachloroethene	164	127-18-4	1	0	U	0.007	0
Tetrahydrofuran	72	109-99-9	1	0	U	0.003	0
Toluene	92	108-88-3	1	0	U	0.004	0
trans-1,2-dichloroethene	96	156-60-5	1	0	U	0.004	0
trans-1,3-Dichloropropene	110	10061-02-6	1	0	U	0.005	0
Trichloroethene	130	79-01-6	1	0	U	0.005	0
Trichlorofluoromethane	136	75-69-4	1	0	U	0.006	0
Vinyl acetate	86	108-05-4	1	0	U	0.004	0
Vinyl chloride	62	75-01-4	1	0	U	0.003	0
Xylenes, m&p-	106	106-33-0	1	0	U	0.004	0
Xylenes, o-	106	95-47-6	1	0	U	0.004	0
Bromochloromethane (surrogate)	128	74-97-5		102	-		
4-BFB(surrogate)	174	460-00-4		100	-		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
 PPBV - Parts per billion volume. MQL - Method quantitation limit.
 Surrogate results are in units of percent recovery with control limits: 85 to 135%.

WWW.SmartChemistry.com
Canister Certification by T015

Client:
 Hydrogen Station at:
 Sample Type: Hydrogen Fuel
 Date Sampled:
 Date Received:
 Date Analyzed: 11/8/2010
 Time Analyzed: 6:03 pm

Field ID #: Sample Container#10
 Lab Sample ID:
 Concentration Units: PPBV
 Date File Location
 Data Filename: 10110803.D
 Dilution Factor: 1.0

Analytes	MW	CASNUM	MQL (PPBV)	Results (PPBV)	Qualifier	MQL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-55-6	1	0	U	0.005	0
1,1,2,2-Tetrachloroethane	166	79-34-5	1	0	U	0.007	0
1,1,2-Trichloroethane	132	79-60-5	1	0	U	0.005	0
1,2-Dibromoethane	186	106-93-4	1	0	U	0.008	0
1,1-Dichloroethane	98	75-34-3	1	0	U	0.004	0
1,1-Dichloroethene	96	75-35-4	1	0	U	0.004	0
1,2,4-Trichlorobenzene	180	120-82-1	1	0	U	0.007	0
1,2,4-Trimethylbenzene	120	95-63-6	1	0	U	0.005	0
1,2-Dichloroethane	98	107-06-2	1	0	U	0.004	0
1,2-Dichloropropane	112	78-87-5	1	0	U	0.005	0
1,3,5-Trimethylbenzene	120	108-67-8	1	0	U	0.005	0
1,3-Butadiene	54	106-99-0	1	0	U	0.002	0
1,2-Dichlorobenzene	146	95-50-1	1	0	U	0.006	0
1,3-Dichlorobenzene	146	541-73-1	1	0	U	0.006	0
1,4-Dichlorobenzene	146	106-46-7	1	0	U	0.006	0
1,4-Dioxane	88	123-91-1	1	0	U	0.004	0
2-Butanone	72	78-93-3	1	0	U	0.003	0
2-Hexanone	100	591-78-6	1	0	U	0.004	0
4-Ethyltoluene	120	622-96-8	1	0	U	0.005	0
4-Methyl-2-Pentanone	100	108-10-1	1	0	U	0.004	0
Acetone	58	67-64-1	1	0	U	0.002	0
Benzene	78	71-43-2	1	0	U	0.003	0
Benzyl Chloride	126	100-44-7	1	0	U	0.005	0
Bromodichloromethane	162	75-27-1	1	0	U	0.007	0
Bromoform	250	75-25-2	1	0	U	0.01	0
Bromomethane	94	74-83-9	1	0	U	0.004	0
Carbon Disulfide	76	75-15-8	1	0	U	0.003	0
Carbon tetrachloride	152	56-23-5	1	0	U	0.006	0
Chlorobenzene	112	108-90-7	1	0	U	0.005	0
Chloroethane	64	75-00-3	1	0	U	0.003	0
Chloroform	118	67-66-3	1	0	U	0.005	0
Chloromethane	50	74-87-3	1	0	U	0.002	0
cis-1,2-dichloroethene	96	156-59-2	1	0	U	0.004	0
cis-1,3-Dichloropropene	110	10061-01-5	1	0	U	0.005	0
Cyclohexane	84	110-82-7	1	0	U	0.003	0
Dibromochloromethane	206	124-48-1	1	0	U	0.008	0
Dichlorodifluoromethane	120	75-71-8	1	0	U	0.005	0
Ethanol	46	64-17-5	1	0	U	0.002	0
Ethyl Acetate	88	141-78-6	1	0	U	0.004	0
Ethylbenzene	106	100-41-4	1	0	U	0.004	0
Freon113	186	76-13-1	1	0	U	0.008	0
Freon114	170	76-14-2	1	0	U	0.007	0
Heptane	100	142-82-5	1	0	U	0.004	0
Hexane	86	110-54-3	1	0	U	0.004	0
Hexachlorobutadiene	258	87-68-3	1	0	U	0.01	0
Isopropyl Alcohol	60	67-63-0	1	0	U	0.002	0
Methylene chloride	84	75-09-2	1	0	U	0.003	0
Methyl tert-Butyl Ether	88	1634-04-4	1	0	U	0.004	0
Propene	36	115-07-1	1	0	U	0.001	0
Styrene	104	100-42-5	1	0	U	0.004	0
Tetrachloroethene	164	127-18-4	1	0	U	0.007	0
Tetrahydrofuran	72	109-99-9	1	0	U	0.003	0
Toluene	92	108-88-3	1	0	U	0.004	0
trans-1,2-dichloroethene	96	156-60-5	1	0	U	0.004	0
trans-1,3-Dichloropropene	110	10061-02-6	1	0	U	0.005	0
Trichloroethene	130	79-01-6	1	0	U	0.005	0
Trichlorofluoromethane	136	75-69-4	1	0	U	0.006	0
Vinyl acetate	86	108-05-4	1	0	U	0.004	0
Vinyl chloride	62	75-01-4	1	0	U	0.003	0
Xylenes, m&p-	106	106-38-2 & 106-42-3	1	0	U	0.004	0
Xylenes, o-	106	95-47-6	1	0	U	0.004	0
Bromochloromethane (surrogate)	128	74-97-5		97	=		
4-BFB(surrogate)	174	460-00-4		103	=		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
 PPBV - Parts per billion volume. MQL - Method quantitation limit.
 Surrogate results are in units of percent recovery with control limits: 65 to 135%.

Smart Chemistry Corporation

3402 La Grande Blvd, Sacramento, CA 95823 (916)391-3300, (916)391-3440 (fax), www.smartchemistry.com, jphsu@smartchemistry.com

Canister Certification by TO15

Client:
Hydrogen Station at:
Sample Type: Hydrogen Fuel
Date Sampled:
Date Received:
Date Analyzed: 01072011
Time Analyzed: 12:12 am

Field ID #: Sample Container#11
Lab Sample ID:
Concentration Units: PPBV
Date File Location
Data Filename: 11010603.D
Dilution Factor: 1.0

Analytes	MW	CASNUM	MQL (PPBV)	Results (PPBV)	Qualifier	MQL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-55-6	1	0	U	0.005	0
1,1,2,2-Tetrachloroethane	166	79-34-5	1	0	U	0.007	0
1,1,2-Trichloroethane	132	79-06-5	1	0	U	0.005	0
1,2-Dibromoethane	186	106-93-4	1	0	U	0.006	0
1,1-Dichloroethane	98	75-34-3	1	0	U	0.004	0
1,1-Dichloroethene	96	75-35-4	1	0	U	0.004	0
1,2,4-Trichlorobenzene	180	120-82-1	1	0	U	0.007	0
1,2,4-Trimethylbenzene	120	95-63-6	1	0	U	0.005	0
1,2-Dichloroethane	98	107-06-2	1	0	U	0.004	0
1,2-Dichloropropane	112	78-87-5	1	0	U	0.005	0
1,3,5-Trimethylbenzene	120	108-67-8	1	0	U	0.005	0
1,3-Butadiene	54	106-99-0	1	0	U	0.002	0
1,2-Dichlorobenzene	146	95-50-1	1	0	U	0.006	0
1,3-Dichlorobenzene	146	541-73-1	1	0	U	0.006	0
1,4-Dichlorobenzene	146	106-46-7	1	0	U	0.006	0
1,4-Dioxane	88	123-91-1	1	0	U	0.004	0
2-Butanone	72	78-93-3	1	0	U	0.003	0
2-Hexanone	100	591-78-6	1	0	U	0.004	0
4-Ethyltoluene	120	622-96-8	1	0	U	0.005	0
4-Methyl-2-Pentanone	100	106-10-1	1	0	U	0.004	0
Acetone	58	67-64-1	1	0	U	0.002	0
Benzene	78	71-43-2	1	0	U	0.003	0
Benzyl Chloride	126	100-44-7	1	0	U	0.005	0
Bromodichloromethane	162	75-27-4	1	0	U	0.007	0
Bromoform	250	75-25-2	1	0	U	0.01	0
Bromomethane	94	74-83-9	1	0	U	0.004	0
Carbon Disulfide	76	75-15-0	1	0	U	0.003	0
Carbon tetrachloride	152	56-23-5	1	0	U	0.006	0
Chlorobenzene	112	108-90-7	1	0	U	0.005	0
Chloroethane	64	75-00-3	1	0	U	0.003	0
Chloroform	118	67-66-3	1	0	U	0.005	0
Chloromethane	50	74-87-3	1	0	U	0.002	0
cis-1,2-dichloroethene	96	156-59-2	1	0	U	0.004	0
cis-1,3-Dichloropropene	110	10061-01-5	1	0	U	0.005	0
Cyclohexane	84	110-82-7	1	0	U	0.005	0
Dibromochloromethane	206	124-48-1	1	0	U	0.008	0
Dichlorodifluoromethane	120	75-71-8	1	0	U	0.005	0
Ethanol	46	64-17-5	1	0	U	0.002	0
Ethyl Acetate	88	141-78-6	1	0	U	0.004	0
Ethylbenzene	106	100-41-4	1	0	U	0.004	0
Freon113	186	76-13-1	1	0	U	0.008	0
Freon114	170	76-14-2	1	0	U	0.007	0
Heptane	100	142-82-5	1	0	U	0.004	0
Hexane	86	110-54-3	1	0	U	0.004	0
Hexachlorobutadiene	258	87-68-3	1	0	U	0.01	0
Isopropyl Alcohol	60	67-63-0	1	0	U	0.002	0
Methylene chloride	84	75-09-2	1	0	U	0.003	0
Methyl tert-Butyl Ether	88	1634-04-4	1	0	U	0.004	0
Propene	36	115-07-3	1	0	U	0.001	0
Styrene	104	100-42-5	1	0	U	0.004	0
Tetrachloroethene	164	127-18-4	1	0	U	0.007	0
Tetrahydrofuran	72	109-99-9	1	0	U	0.003	0
Toluene	92	108-88-3	1	0	U	0.004	0
trans-1,2-dichloroethene	96	156-60-5	1	0	U	0.004	0
trans-1,3-Dichloropropene	110	10061-02-6	1	0	U	0.005	0
Trichloroethene	130	79-01-6	1	0	U	0.005	0
Trichlorofluoromethane	136	75-69-4	1	0	U	0.006	0
Vinyl acetate	86	108-05-4	1	0	U	0.004	0
Vinyl chloride	62	75-01-4	1	0	U	0.003	0
Xylenes, m&p-	106	106-38-3 & 106-42-3	1	0	U	0.004	0
Xylenes, o-	106	95-47-6	1	0	U	0.004	0
Bromochloromethane (surrogate)	128	74-97-5		86	=		
4-BFB(surrogate)	174	460-00-4		93	=		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
 PPBV - Parts per billion volume. MQL - Method quantitation limit.
 Surrogate results are in units of percent recovery with control limits: 65 to 135%

www.SmartChemistry.com
Canister Certification by TO15

Client:
 Hydrogen Station at:
 Sample Type: Hydrogen Fuel
 Date Sampled:
 Date Received:
 Date Analyzed: 1/22/2011
 Time Analyzed: 2:23 pm

Field ID #: Sample Container #9
 Lab Sample ID:
 Concentration Units: PPBV
 Date File Location
 Data Filename: 11012205.D
 Dilution Factor: 1.0

Analytes	MW	CASNUM	MQL (PPBV)	Results (PPBV)	Qualifier	MQL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-55-6	1	0	U	0.005	0
1,1,1,2-Tetrachloroethane	166	79-34-5	1	0	U	0.007	0
1,1,2-Trichloroethane	132	79-00-5	1	0	U	0.005	0
1,2-Dibromoethane	186	106-93-4	1	0	U	0.008	0
1,1-Dichloroethane	98	75-34-3	1	0	U	0.004	0
1,1-Dichloroethene	96	75-35-4	1	0	U	0.004	0
1,2,4-Trichlorobenzene	180	120-82-1	1	0	U	0.007	0
1,2,4-Trimethylbenzene	120	95-63-6	1	0	U	0.005	0
1,2-Dichloroethane	98	107-06-2	1	0	U	0.004	0
1,2-Dichloropropane	112	78-87-5	1	0	U	0.005	0
1,3,5-Trimethylbenzene	120	108-67-8	1	0	U	0.005	0
1,3-Butadiene	54	106-99-0	1	0	U	0.002	0
1,2-Dichlorobenzene	146	95-50-1	1	0	U	0.006	0
1,3-Dichlorobenzene	146	541-73-1	1	0	U	0.006	0
1,4-Dichlorobenzene	146	106-46-7	1	0	U	0.006	0
1,4-Dioxane	88	123-91-1	1	0	U	0.004	0
2-Butanone	72	78-93-3	1	0	U	0.003	0
2-Hexanone	100	591-78-6	1	0	U	0.004	0
4-Ethyltoluene	120	622-96-8	1	0	U	0.005	0
4-Methyl-2-Pentanone	100	108-10-1	1	0	U	0.004	0
Acetone	58	67-64-1	1	0	U	0.002	0
Benzene	78	71-43-2	1	0	U	0.003	0
Benzyl Chloride	126	100-44-7	1	0	U	0.005	0
Bromodichloromethane	162	75-27-4	1	0	U	0.007	0
Bromoform	250	75-25-2	1	0	U	0.01	0
Bromomethane	94	74-83-9	1	0	U	0.004	0
Carbon Disulfide	76	75-15-0	1	0	U	0.003	0
Carbon tetrachloride	152	56-23-5	1	0	U	0.006	0
Chlorobenzene	112	108-90-7	1	0	U	0.005	0
Chloroethane	64	75-00-3	1	0	U	0.003	0
Chloroform	118	67-66-3	1	0	U	0.005	0
Chloromethane	50	74-87-3	1	0	U	0.002	0
cis-1,2-dichloroethene	96	156-59-2	1	0	U	0.004	0
cis-1,3-Dichloropropene	110	10061-01-5	1	0	U	0.005	0
Cyclohexane	84	110-82-7	1	0	U	0.003	0
Dibromochloromethane	206	124-48-1	1	0	U	0.008	0
Dichlorodifluoromethane	120	75-71-8	1	0	U	0.005	0
Ethanol	46	64-17-5	1	0	U	0.002	0
Ethyl Acetate	88	141-78-6	1	0	U	0.004	0
Ethylbenzene	106	100-41-4	1	0	U	0.004	0
Freon113	186	76-13-1	1	0	U	0.008	0
Freon114	170	76-14-2	1	0	U	0.007	0
Heptane	100	142-82-5	1	0	U	0.004	0
Hexane	86	110-54-3	1	0	U	0.004	0
Hexachlorobutadiene	258	87-68-3	1	0	U	0.01	0
Isopropyl Alcohol	60	67-63-0	1	0	U	0.002	0
Methylene chloride	84	75-09-2	1	0	U	0.003	0
Methyl tert-Butyl Ether	88	1634-04-4	1	0	U	0.004	0
Propene	36	115-07-1	1	0	U	0.001	0
Styrene	104	100-42-5	1	0	U	0.004	0
Tetrachloroethene	164	127-18-4	1	0	U	0.007	0
Tetrahydrofuran	72	109-99-9	1	0	U	0.003	0
Toluene	92	108-88-3	1	0	U	0.004	0
trans-1,2-dichloroethene	96	156-60-5	1	0	U	0.004	0
trans-1,3-Dichloropropene	110	10061-02-6	1	0	U	0.005	0
Trichloroethene	130	79-01-6	1	0	U	0.005	0
Trichlorofluoromethane	136	75-69-4	1	0	U	0.006	0
Vinyl acetate	86	108-05-4	1	0	U	0.004	0
Vinyl chloride	62	75-01-4	1	0	U	0.003	0
Xylenes, m&p-	106	106-34-3 & 106-42-3	1	0	U	0.004	0
Xylenes, o-	106	95-47-6	1	0	U	0.004	0
Bromochloromethane (surrogate)	128	74-97-5		75	=		
4-BFB(surrogate)	174	460-00-4		98	=		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
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 Surrogate results are in units of percent recovery with control limits: 65 to 135%.

CALIFORNIA LABORATORY SERVICES

3249 Fitzgerald Road Rancho Cordova, CA 95742

May 23, 2011

CLS Work Order #: CUE0511
COC #: 124170


Phil Goalwin
E2C Remediation (Bakersfield Office)
5300 Woodmere Drive, Suite 105
Bakersfield, CA 93313

Project Name: One Hour Martinizing

Enclosed are the results of analyses for samples received by the laboratory on 05/12/11 13:45. Samples were analyzed pursuant to client request utilizing EPA or other ELAP approved methodologies. I certify that the results are in compliance both technically and for completeness. Any comments and expectations are addressed under the Notes and Definitions section.

Analytical results are attached to this letter. Please call if we can provide additional assistance.

Sincerely,



James Liang, Ph.D.
Laboratory Director

CA DOHS ELAP Accreditation/Registration number 1233

REPORT TO:			CLIENT JOB NUMBER			ANALYSIS REQUESTED				GEOTRACKER:															
NAME AND ADDRESS <i>E2C Remediation</i> <i>5300 Woodmere Dr #105</i> <i>Bakersfield, CA 93313</i>			<i>1973BK</i>			PRESERVATIVES <i>90928</i> <i>Extractibles</i> <i>(TPHD Full range)</i>				EDF REPORT <input type="checkbox"/> YES <input type="checkbox"/> NO															
PROJECT MANAGER <i>Phil Coalwin 661-587-0585</i>			DESTINATION LABORATORY <input checked="" type="checkbox"/> CLS (916) 638-7301 3249 FITZGERALD RD. RANCHO CORDOVA, CA 95742							GLOBAL ID: _____															
PROJECT NAME <i>One Hour Martinizing</i>			<input type="checkbox"/> OTHER							COMPOSITE: _____															
SAMPLED BY <i>Don Hidalgo</i>						FIELD CONDITIONS: <i>cool; breezy</i>																			
JOB DESCRIPTION <i>soil and water sampling</i>						TURN AROUND TIME				SPECIAL INSTRUCTIONS															
SITE LOCATION <i>712 Madison, Fairfield, CA</i>						<table border="1" style="width:100%; text-align: center;"> <tr> <th>1 DAY</th> <th>2 DAY</th> <th>5 DAY</th> <th>10 DAY</th> <th colspan="2">OR</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <th>ALT.</th> <th>ID:</th> </tr> </table>				1 DAY	2 DAY	5 DAY	10 DAY	OR						ALT.	ID:				
1 DAY	2 DAY	5 DAY	10 DAY	OR																					
				ALT.	ID:																				
DATE	TIME	SAMPLE IDENTIFICATION	MATRIX	CONTAINER NO.	TYPE																				
<i>5-11-11</i>	<i>10:50a</i>	<i>OHM-2; 3-3.5'</i>	<i>SOIL</i>	<i>1</i>	<i>liner</i>	<i>3</i>	<i>X</i>					<i>X</i>													
<i>5-11-11</i>	<i>11:10a</i>	<i>OHM-4; 3-3.5'</i>	<i>SOIL</i>	<i>1</i>	<i>liner</i>	<i>3</i>	<i>X</i>					<i>X</i>													
<i>5-11-11</i>	<i>11:30a</i>	<i>OHM-1; 3-3.5'</i>	<i>SOIL</i>	<i>1</i>	<i>liner</i>	<i>3</i>	<i>X</i>					<i>X</i>													
<i>5-11-11</i>	<i>12:50p</i>	<i>OHM-3; 3-3.5'</i>	<i>SOIL</i>	<i>1</i>	<i>liner</i>	<i>3</i>	<i>X</i>					<i>X</i>													
<i>5-11-11</i>	<i>1:59p</i>	<i>OHM-3; 7-7.5'</i>	<i>SOIL</i>	<i>1</i>	<i>liner</i>	<i>3</i>	<i>X</i>	<i>X</i>				<i>X</i>	<i>PI0=600ppm; Natalie</i> <i>call Phil Coalwin</i> <i>@ 661-587-0585</i>												
<i>5-11-11</i>	<i>1:04p</i>	<i>OHM-2-10' (GW)</i>	<i>Water</i>	<i>2</i>	<i>VOA</i>	<i>1/3</i>	<i>X</i>					<i>X</i>													
<i>5-11-11</i>	<i>1:35p</i>	<i>OHM-2-24' (GW)</i>	<i>Water</i>	<i>3</i>	<i>VOA</i>	<i>1/3</i>	<i>X</i>					<i>X</i>													
<i>5-11-11</i>	<i>3:55p</i>	<i>OHM-3-25' (GW)</i>	<i>Water</i>	<i>3</i>	<i>VOA</i>	<i>1/3</i>	<i>X</i>					<i>X</i>	<i>INVOICE TO:</i>												
<i>5-11-11</i>	<i>5:15p</i>	<i>OHM-4-25' (GW)</i>	<i>Water</i>	<i>3</i>	<i>VOA</i>	<i>1/3</i>	<i>X</i>					<i>X</i>													
<i>5-11-11</i>	<i>5:40p</i>	<i>OHM-1-10' (GW)</i>	<i>Water</i>	<i>3</i>	<i>VOA</i>	<i>1</i>	<i>X</i>					<i>X</i>	<i>RO #</i>												
<i>5-11-11</i>	<i>6:25p</i>	<i>OHM-1-20' (GW)</i>	<i>Water</i>	<i>3</i>	<i>VOA</i>	<i>1</i>	<i>X</i>					<i>X</i>	<i>QUOTE #</i>												
SUSPECTED CONSTITUENTS <i>PCE</i>						PRESERVATIVES: (1) HCL (2) HNO ₃ (3) = GOLD (4) = NaOH (5) = H ₂ SO ₄ (6) = Na ₂ S ₂ O ₅ (7) =																			
RELINQUISHED BY (SIGN) <i>Don Hidalgo</i>			PRINT NAME / COMPANY <i>E2C Remediation</i>			DATE / TIME <i>5-12-11 1:45</i>			RECEIVED BY (SIGN)			PRINT NAME / COMPANY													
REC'D AT LAB BY: <i>Natalie Neadway</i>			DATE / TIME: <i>5/12/11 @ 1:45pm</i>			CONDITIONS / COMMENTS: <i>W.T. 10.1. 8.7</i>			AIR BILL #																
SHIPPED BY: <input type="checkbox"/> FED X <input type="checkbox"/> UPS <input type="checkbox"/> OTHER																									

LAB

2 of 2

CLS - Labs

CHAIN OF CUSTODY

CLS ID No.: **CVEDT511** LOG NO. **WEB FORM**

REPORT TO:
 E2C Remediation
 5300 Woodmese Dr #105
 Bakersfield, CA 93313
 PROJECT MANAGER:
 Phil Goalwin 661-582-0585
 PROJECT NAME:
 One Hour Mastinizing
 SAMPLED BY:
 Dan Hidalgo
 JOB DESCRIPTION:
 SOIL VAPOR SAMPLING

1973 BK
 CLS (916) 638-7301
 222011 ZEPHURUS RD
 RANCHO COCCOA, CA 95742
 OTHER

PRESERVATIVES

X XXXX T015 (CC/MS)

ANALYSIS REQUESTED

GEOTRACKER:
 EDF REPORT | YES | NO
 GLOBAL ID:
 COMPOSITE

712 Madison, Fairfield, CA

DATE	TIME	SAMPLE IDENTIFICATION	MATRIX	VOLUME	TYPE
5-11-11	10:22a	OHM-2	vapor	1	liter
5-11-11	10:47a	OHM-4	vapor	1	liter
5-11-11	11:11a	OHM-1	vapor	1	liter
5-11-11	11:46a	OHM-3	vapor	1	liter

FIELD CONDITIONS:
 cool; breezy

TURN AROUND TIME	SPECIAL INSTRUCTIONS
	OR
	ALL ID:
	X Summa 12
	X Summa 9
	X Summa 10
	X Summa 11

SUSPECTED CONTAMINANTS: PCE

RELINQUISHED BY (SIGN): *Dan Hidalgo* PRINT NAME: COMPANY: E2C Remediation DATE / TIME: 5-12-11 1:45

PRESERVATIVES:
 (1) HOT (2) COLD (3) OTHER
 RECEIVED BY (SIGN):

(5) - M.S.O. (6) - No S.O.
 PRINT NAME: COMPANY:

SHIPPED BY: *Natalie meadoway* FED X DATE: 5/12/11 @ 1:45pm UPS OTHER

COMPOSITE CONTAMINANTS: AIR BILL #

CALIFORNIA LABORATORY SERVICES

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Extractable Petroleum Hydrocarbons by EPA Method 8015M

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-3; 7-7.5' (CUE0511-05) Soil Sampled: 05/11/11 13:59 Received: 05/12/11 13:45									
Diesel	ND	1.0	mg/kg	1	CU03398	05/17/11	05/17/11	EPA 8015M	
Motor Oil	ND	1.0	"	"	"	"	"	"	
Hydraulic Oil	ND	1.0	"	"	"	"	"	"	
Mineral Oil	60	1.0	"	"	"	"	"	"	
Kerosene	ND	1.0	"	"	"	"	"	"	
Stoddard Solvent	61	1.0	"	"	"	"	"	"	
<i>Surrogate: o-Terphenyl</i>		<i>101 %</i>		<i>65-135</i>	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-2; 3-3.5' (CUE0511-01) Soil Sampled: 05/11/11 10:50 Received: 05/12/11 13:45									
Acetone	ND	100	µg/kg	1	CU03449	05/17/11	05/17/11	EPA 8260B	
Benzene	ND	5.0	"	"	"	"	"	"	
Bromobenzene	ND	5.0	"	"	"	"	"	"	
Bromochloromethane	ND	5.0	"	"	"	"	"	"	
Bromodichloromethane	ND	5.0	"	"	"	"	"	"	
Bromoform	ND	5.0	"	"	"	"	"	"	
Bromomethane	ND	10	"	"	"	"	"	"	
2-Butanone	ND	100	"	"	"	"	"	"	
n-Butylbenzene	ND	5.0	"	"	"	"	"	"	
sec-Butylbenzene	ND	5.0	"	"	"	"	"	"	
tert-Butylbenzene	ND	5.0	"	"	"	"	"	"	
Carbon tetrachloride	ND	5.0	"	"	"	"	"	"	
Chlorobenzene	ND	5.0	"	"	"	"	"	"	
Chloroethane	ND	5.0	"	"	"	"	"	"	
Chloroform	ND	5.0	"	"	"	"	"	"	
Chloromethane	ND	10	"	"	"	"	"	"	
o-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
p-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
Dibromochloromethane	ND	5.0	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	10	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	5.0	"	"	"	"	"	"	
Dibromomethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	10	"	"	"	"	"	"	
1,1-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloroethene	ND	5.0	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
1,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,3-Dichloropropane	ND	5.0	"	"	"	"	"	"	
2,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloropropene	ND	5.0	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-2; 3-3.5' (CUE0511-01) Soil Sampled: 05/11/11 10:50 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	5.0	µg/kg	1	CU03449	"	05/17/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	5.0	"	"	"	"	"	"	
Ethylbenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	5.0	"	"	"	"	"	"	
Hexachlorobutadiene	ND	5.0	"	"	"	"	"	"	
2-Hexanone	ND	5.0	"	"	"	"	"	"	
Isopropylbenzene	ND	5.0	"	"	"	"	"	"	
p-Isopropyltoluene	ND	5.0	"	"	"	"	"	"	
Methylene chloride	ND	5.0	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	5.0	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	5.0	"	"	"	"	"	"	
Naphthalene	ND	5.0	"	"	"	"	"	"	
n-Propylbenzene	ND	5.0	"	"	"	"	"	"	
Styrene	ND	5.0	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
Tetrachloroethene	86	25	"	5	"	"	"	"	"
Toluene	ND	5.0	"	1	"	"	"	"	
1,2,3-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	5.0	"	"	"	"	"	"	
Trichloroethene	ND	5.0	"	"	"	"	"	"	
Trichlorofluoromethane	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	5.0	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
Vinyl chloride	ND	10	"	"	"	"	"	"	
Xylenes (total)	ND	10	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		92 %		50-125	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		99 %		62-125	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		107 %		50-128	"	"	"	"	
OHM-4; 3-3.5' (CUE0511-02) Soil Sampled: 05/11/11 11:10 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-4; 3-3.5' (CUE0511-02) Soil Sampled: 05/11/11 11:10 Received: 05/12/11 13:45									
Acetone	ND	100	µg/kg	1	CU03449	05/17/11	05/17/11	EPA 8260B	
Benzene	ND	5.0	"	"	"	"	"	"	
Bromobenzene	ND	5.0	"	"	"	"	"	"	
Bromochloromethane	ND	5.0	"	"	"	"	"	"	
Bromodichloromethane	ND	5.0	"	"	"	"	"	"	
Bromoform	ND	5.0	"	"	"	"	"	"	
Bromomethane	ND	10	"	"	"	"	"	"	
2-Butanone	ND	100	"	"	"	"	"	"	
n-Butylbenzene	ND	5.0	"	"	"	"	"	"	
sec-Butylbenzene	ND	5.0	"	"	"	"	"	"	
tert-Butylbenzene	ND	5.0	"	"	"	"	"	"	
Carbon tetrachloride	ND	5.0	"	"	"	"	"	"	
Chlorobenzene	ND	5.0	"	"	"	"	"	"	
Chloroethane	ND	5.0	"	"	"	"	"	"	
Chloroform	ND	5.0	"	"	"	"	"	"	
Chloromethane	ND	10	"	"	"	"	"	"	
o-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
p-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
Dibromochloromethane	ND	5.0	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	10	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	5.0	"	"	"	"	"	"	
Dibromomethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	10	"	"	"	"	"	"	
1,1-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloroethene	ND	5.0	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
1,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,3-Dichloropropane	ND	5.0	"	"	"	"	"	"	
2,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloropropene	ND	5.0	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-4; 3-3.5' (CUE0511-02) Soil Sampled: 05/11/11 11:10 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	5.0	µg/kg	1	CU03449	"	05/17/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	5.0	"	"	"	"	"	"	
Ethylbenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	5.0	"	"	"	"	"	"	
Hexachlorobutadiene	ND	5.0	"	"	"	"	"	"	
2-Hexanone	ND	50	"	"	"	"	"	"	
Isopropylbenzene	ND	5.0	"	"	"	"	"	"	
p-Isopropyltoluene	ND	5.0	"	"	"	"	"	"	
Methylene chloride	ND	5.0	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	50	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	5.0	"	"	"	"	"	"	
Naphthalene	ND	5.0	"	"	"	"	"	"	
n-Propylbenzene	ND	5.0	"	"	"	"	"	"	
Styrene	ND	5.0	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
Tetrachloroethene	ND	5.0	"	"	"	"	"	"	
Toluene	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	5.0	"	"	"	"	"	"	
Trichloroethene	ND	5.0	"	"	"	"	"	"	
Trichlorofluoromethane	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	5.0	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
Vinyl chloride	ND	10	"	"	"	"	"	"	
Xylenes (total)	ND	10	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		91 %	50-125		"	"	"	"	
<i>Surrogate: Toluene-d8</i>		100 %	62-125		"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		102 %	50-128		"	"	"	"	
OHM-1; 3-3.5' (CUE0511-03) Soil Sampled: 05/11/11 11:30 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting		Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit	Units						
OHM-1; 3-3.5' (CUE0511-03) Soil Sampled: 05/11/11 11:30 Received: 05/12/11 13:45									
Acetone	ND	100	µg/kg	1	CU03449	05/17/11	05/17/11	EPA 8260B	
Benzene	ND	5.0	"	"	"	"	"	"	
Bromobenzene	ND	5.0	"	"	"	"	"	"	
Bromochloromethane	ND	5.0	"	"	"	"	"	"	
Bromodichloromethane	ND	5.0	"	"	"	"	"	"	
Bromoform	ND	5.0	"	"	"	"	"	"	
Bromomethane	ND	10	"	"	"	"	"	"	
2-Butanone	ND	100	"	"	"	"	"	"	
n-Butylbenzene	ND	5.0	"	"	"	"	"	"	
sec-Butylbenzene	ND	5.0	"	"	"	"	"	"	
tert-Butylbenzene	ND	5.0	"	"	"	"	"	"	
Carbon tetrachloride	ND	5.0	"	"	"	"	"	"	
Chlorobenzene	ND	5.0	"	"	"	"	"	"	
Chloroethane	ND	5.0	"	"	"	"	"	"	
Chloroform	ND	5.0	"	"	"	"	"	"	
Chloromethane	ND	10	"	"	"	"	"	"	
o-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
p-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
Dibromochloromethane	ND	5.0	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	10	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	5.0	"	"	"	"	"	"	
Dibromomethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	10	"	"	"	"	"	"	
1,1-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloroethene	ND	5.0	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
1,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,3-Dichloropropane	ND	5.0	"	"	"	"	"	"	
2,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloropropene	ND	5.0	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
---	--	--

Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-1; 3-3.5' (CUE0511-03) Soil Sampled: 05/11/11 11:30 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	5.0	µg/kg	1	CU03449	"	05/17/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	5.0	"	"	"	"	"	"	
Ethylbenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	5.0	"	"	"	"	"	"	
Hexachlorobutadiene	ND	5.0	"	"	"	"	"	"	
2-Hexanone	ND	50	"	"	"	"	"	"	
Isopropylbenzene	ND	5.0	"	"	"	"	"	"	
p-Isopropyltoluene	ND	5.0	"	"	"	"	"	"	
Methylene chloride	ND	5.0	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	50	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	5.0	"	"	"	"	"	"	
Naphthalene	ND	5.0	"	"	"	"	"	"	
n-Propylbenzene	ND	5.0	"	"	"	"	"	"	
Styrene	ND	5.0	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
Tetrachloroethene	190	25	"	5	"	"	"	"	"
Toluene	ND	5.0	"	1	"	"	"	"	
1,2,3-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	5.0	"	"	"	"	"	"	
Trichloroethene	ND	5.0	"	"	"	"	"	"	
Trichlorofluoromethane	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	5.0	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
Vinyl chloride	ND	10	"	"	"	"	"	"	
Xylenes (total)	ND	10	"	"	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		90 %		50-125	"	"	"	"	
Surrogate: Toluene-d8		100 %		62-125	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		100 %		50-128	"	"	"	"	
OHM-3; 3-3.5' (CUE0511-04) Soil Sampled: 05/11/11 12:50 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting		Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
		Limit								
OHM-3; 3-3.5' (CUE0511-04) Soil Sampled: 05/11/11 12:50 Received: 05/12/11 13:45										
Acetone	ND	100		µg/kg	1	CU03449	05/17/11	05/17/11	EPA 8260B	
Benzene	ND	5.0	"	"	"	"	"	"	"	
Bromobenzene	ND	5.0	"	"	"	"	"	"	"	
Bromochloromethane	ND	5.0	"	"	"	"	"	"	"	
Bromodichloromethane	ND	5.0	"	"	"	"	"	"	"	
Bromoform	ND	5.0	"	"	"	"	"	"	"	
Bromomethane	ND	10	"	"	"	"	"	"	"	
2-Butanone	ND	100	"	"	"	"	"	"	"	
n-Butylbenzene	ND	5.0	"	"	"	"	"	"	"	
sec-Butylbenzene	ND	5.0	"	"	"	"	"	"	"	
tert-Butylbenzene	ND	5.0	"	"	"	"	"	"	"	
Carbon tetrachloride	ND	5.0	"	"	"	"	"	"	"	
Chlorobenzene	ND	5.0	"	"	"	"	"	"	"	
Chloroethane	ND	5.0	"	"	"	"	"	"	"	
Chloroform	ND	5.0	"	"	"	"	"	"	"	
Chloromethane	ND	10	"	"	"	"	"	"	"	
o-Chlorotoluene	ND	5.0	"	"	"	"	"	"	"	
p-Chlorotoluene	ND	5.0	"	"	"	"	"	"	"	
Dibromochloromethane	ND	5.0	"	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	10	"	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	5.0	"	"	"	"	"	"	"	
Dibromomethane	ND	5.0	"	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	10	"	"	"	"	"	"	"	
1,1-Dichloroethane	ND	5.0	"	"	"	"	"	"	"	
1,2-Dichloroethane	ND	5.0	"	"	"	"	"	"	"	
1,1-Dichloroethene	ND	5.0	"	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	"	
1,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	"	
1,3-Dichloropropane	ND	5.0	"	"	"	"	"	"	"	
2,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	"	
1,1-Dichloropropene	ND	5.0	"	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office)
5300 Woodmere Drive, Suite 105
Bakersfield CA, 93313

Project: One Hour Martinizing
Project Number: 1973BK
Project Manager: Phil Goalwin

CLS Work Order #: CUE0511
COC #: 124170

Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-3; 3-3.5' (CUE0511-04) Soil Sampled: 05/11/11 12:50 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	5.0	µg/kg	1	CU03449	"	05/17/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	5.0	"	"	"	"	"	"	
Ethylbenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	5.0	"	"	"	"	"	"	
Hexachlorobutadiene	ND	5.0	"	"	"	"	"	"	
2-Hexanone	ND	5.0	"	"	"	"	"	"	
Isopropylbenzene	ND	5.0	"	"	"	"	"	"	
p-Isopropyltoluene	ND	5.0	"	"	"	"	"	"	
Methylene chloride	ND	5.0	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	5.0	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	5.0	"	"	"	"	"	"	
Naphthalene	ND	5.0	"	"	"	"	"	"	
n-Propylbenzene	ND	5.0	"	"	"	"	"	"	
Styrene	ND	5.0	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
Tetrachloroethene	21	5.0	"	"	"	"	"	"	
Toluene	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	5.0	"	"	"	"	"	"	
Trichloroethene	ND	5.0	"	"	"	"	"	"	
Trichlorofluoromethane	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	5.0	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
Vinyl chloride	ND	10	"	"	"	"	"	"	
Xylenes (total)	ND	10	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		91 %	50-125	"	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		100 %	62-125	"	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		105 %	50-128	"	"	"	"	"	
OHM-3; 7-7.5' (CUE0511-05) Soil Sampled: 05/11/11 13:59 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-3; 7-7.5' (CUE0511-05) Soil Sampled: 05/11/11 13:59 Received: 05/12/11 13:45									
Acetone	ND	100	µg/kg	1	CU03449	05/17/11	05/17/11	EPA 8260B	
Benzene	ND	5.0	"	"	"	"	"	"	
Bromobenzene	ND	5.0	"	"	"	"	"	"	
Bromochloromethane	ND	5.0	"	"	"	"	"	"	
Bromodichloromethane	ND	5.0	"	"	"	"	"	"	
Bromoform	ND	5.0	"	"	"	"	"	"	
Bromomethane	ND	10	"	"	"	"	"	"	
2-Butanone	ND	100	"	"	"	"	"	"	
n-Butylbenzene	ND	5.0	"	"	"	"	"	"	
sec-Butylbenzene	ND	5.0	"	"	"	"	"	"	
tert-Butylbenzene	ND	5.0	"	"	"	"	"	"	
Carbon tetrachloride	ND	5.0	"	"	"	"	"	"	
Chlorobenzene	ND	5.0	"	"	"	"	"	"	
Chloroethane	ND	5.0	"	"	"	"	"	"	
Chloroform	ND	5.0	"	"	"	"	"	"	
Chloromethane	ND	10	"	"	"	"	"	"	
o-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
p-Chlorotoluene	ND	5.0	"	"	"	"	"	"	
Dibromochloromethane	ND	5.0	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	10	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	5.0	"	"	"	"	"	"	
Dibromomethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	5.0	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	10	"	"	"	"	"	"	
1,1-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,2-Dichloroethane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloroethene	ND	5.0	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	5.0	"	"	"	"	"	"	
1,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,3-Dichloropropane	ND	5.0	"	"	"	"	"	"	
2,2-Dichloropropane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloropropene	ND	5.0	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office)
5300 Woodmere Drive, Suite 105
Bakersfield CA, 93313

Project: One Hour Martinizing
Project Number: 1973BK
Project Manager: Phil Goalwin

CLS Work Order #: CUE0511
COC #: 124170

Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-3; 7-7.5' (CUE0511-05) Soil Sampled: 05/11/11 13:59 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	5.0	µg/kg	1	CU03449	"	05/17/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	5.0	"	"	"	"	"	"	
Ethylbenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	5.0	"	"	"	"	"	"	
Hexachlorobutadiene	ND	5.0	"	"	"	"	"	"	
2-Hexanone	ND	50	"	"	"	"	"	"	
Isopropylbenzene	ND	5.0	"	"	"	"	"	"	
p-isopropyltoluene	ND	5.0	"	"	"	"	"	"	
Methylene chloride	ND	5.0	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	50	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	5.0	"	"	"	"	"	"	
Naphthalene	ND	5.0	"	"	"	"	"	"	
n-Propylbenzene	ND	5.0	"	"	"	"	"	"	
Styrene	ND	5.0	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	5.0	"	"	"	"	"	"	
Tetrachloroethene	ND	5.0	"	"	"	"	"	"	
Toluene	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	5.0	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	5.0	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	5.0	"	"	"	"	"	"	
Trichloroethene	ND	5.0	"	"	"	"	"	"	
Trichlorofluoromethane	ND	5.0	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	5.0	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
Vinyl chloride	ND	10	"	"	"	"	"	"	
Xylenes (total)	ND	10	"	"	"	"	"	"	
Surrogate: 1,2-Dichloroethane-d4		89 %	50-125		"	"	"	"	
Surrogate: Toluene-d8		100 %	62-125		"	"	"	"	
Surrogate: 4-Bromofluorobenzene		88 %	50-128		"	"	"	"	
OHM-2-10' (GW) (CUE0511-06) Water Sampled: 05/11/11 13:04 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office)
5300 Woodmere Drive, Suite 105
Bakersfield CA. 93313

Project: One Hour Martinizing
Project Number: 1973BK
Project Manager: Phil Goalwin

CLS Work Order #: CUE0511
COC #: 124170

Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-2-10' (GW) (CUE0511-06) Water Sampled: 05/11/11 13:04 Received: 05/12/11 13:45									
Acetone	ND	10	µg/L	1	CU03343	05/13/11	05/13/11	EPA 8260B	
Benzene	ND	0.50	"	"	"	"	"	"	
Bromobenzene	ND	0.50	"	"	"	"	"	"	
Bromochloromethane	ND	0.50	"	"	"	"	"	"	
Bromodichloromethane	ND	0.50	"	"	"	"	"	"	
Bromoform	ND	0.50	"	"	"	"	"	"	
Bromomethane	ND	1.0	"	"	"	"	"	"	
2-Butanone	ND	10	"	"	"	"	"	"	
n-Butylbenzene	ND	0.50	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.50	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.50	"	"	"	"	"	"	
Chlorobenzene	ND	0.50	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Chloroform	1.6	0.50	"	"	"	"	"	"	
Chloromethane	ND	1.0	"	"	"	"	"	"	
o-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
p-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
Dibromochloromethane	ND	0.50	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	1.0	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.50	"	"	"	"	"	"	
Dibromomethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	1.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	6.3	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.50	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.50	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-2-10' (GW) (CUE0511-06) Water Sampled: 05/11/11 13:04 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	0.50	µg/L	1	CU03343	"	05/13/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	0.50	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	0.50	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.50	"	"	"	"	"	"	
2-Hexanone	ND	10	"	"	"	"	"	"	
Isopropylbenzene	ND	0.50	"	"	"	"	"	"	
p-isopropyltoluene	ND	0.50	"	"	"	"	"	"	
Methylene chloride	ND	0.50	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	10	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	0.50	"	"	"	"	"	"	
Naphthalene	6.5	0.50	"	"	"	"	"	"	
n-Propylbenzene	ND	0.50	"	"	"	"	"	"	
Styrene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	9.7	0.50	"	"	"	"	"	"	
Toluene	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Trichloroethene	2.8	0.50	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.50	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	1.7	1.0	"	"	"	"	"	"	
Xylenes (total)	ND	1.0	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		84 %		66-135	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		85 %		72-125	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		107 %		73-125	"	"	"	"	
OHM-2-24' (GW) (CUE0511-07) Water Sampled: 05/11/11 13:35 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-2-24' (GW) (CUE0511-07) Water Sampled: 05/11/11 13:35 Received: 05/12/11 13:45									
Acetone	ND	10	µg/L	1	CU03343	05/13/11	05/13/11	EPA 8260B	
Benzene	ND	0.50	"	"	"	"	"	"	
Bromobenzene	ND	0.50	"	"	"	"	"	"	
Bromochloromethane	ND	0.50	"	"	"	"	"	"	
Bromodichloromethane	ND	0.50	"	"	"	"	"	"	
Bromoform	ND	0.50	"	"	"	"	"	"	
Bromomethane	ND	1.0	"	"	"	"	"	"	
2-Butanone	ND	10	"	"	"	"	"	"	
n-Butylbenzene	ND	0.50	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.50	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.50	"	"	"	"	"	"	
Chlorobenzene	ND	0.50	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.50	"	"	"	"	"	"	
Chloromethane	ND	1.0	"	"	"	"	"	"	
o-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
p-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
Dibromochloromethane	ND	0.50	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	1.0	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.50	"	"	"	"	"	"	
Dibromomethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	1.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	0.98	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	3.3	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.50	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.50	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-2-24' (GW) (CUE0511-07) Water Sampled: 05/11/11 13:35 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	0.50	µg/L	1	CU03343	"	05/13/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	0.50	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	0.50	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.50	"	"	"	"	"	"	
2-Hexanone	ND	10	"	"	"	"	"	"	
Isopropylbenzene	ND	0.50	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.50	"	"	"	"	"	"	
Methylene chloride	ND	0.50	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	10	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	0.50	"	"	"	"	"	"	
Naphthalene	3.5	0.50	"	"	"	"	"	"	
n-Propylbenzene	ND	0.50	"	"	"	"	"	"	
Styrene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	19	0.50	"	"	"	"	"	"	
Toluene	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Trichloroethene	3.4	0.50	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.50	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	3.5	1.0	"	"	"	"	"	"	
Xylenes (total)	ND	1.0	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		88 %		66-135	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		88 %		72-125	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		112 %		73-125	"	"	"	"	
OHM-3-25' (GW) (CUE0511-08) Water Sampled: 05/11/11 15:55 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office)
5300 Woodmere Drive, Suite 105
Bakersfield CA, 93313

Project: One Hour Martinizing
Project Number: 1973BK
Project Manager: Phil Goalwin

CLS Work Order #: CUE0511
COC #: 124170

Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-3-25' (GW) (CUE0511-08) Water Sampled: 05/11/11 15:55 Received: 05/12/11 13:45									
Acetone	ND	10	µg/L	1	CU03343	05/13/11	05/13/11	EPA 8260B	
Benzene	ND	0.50	"	"	"	"	"	"	
Bromobenzene	ND	0.50	"	"	"	"	"	"	
Bromochloromethane	ND	0.50	"	"	"	"	"	"	
Bromodichloromethane	ND	0.50	"	"	"	"	"	"	
Bromoform	ND	0.50	"	"	"	"	"	"	
Bromomethane	ND	1.0	"	"	"	"	"	"	
2-Butanone	ND	10	"	"	"	"	"	"	
n-Butylbenzene	ND	0.50	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.50	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.50	"	"	"	"	"	"	
Chlorobenzene	ND	0.50	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Chloroform	ND	0.50	"	"	"	"	"	"	
Chloromethane	ND	1.0	"	"	"	"	"	"	
o-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
p-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
Dibromochloromethane	ND	0.50	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	1.0	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.50	"	"	"	"	"	"	
Dibromomethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichlorobenzene	0.83	0.50	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	1.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	1.1	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	4.4	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	4.2	0.50	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.50	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA. 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-3-25' (GW) (CUE0511-08) Water Sampled: 05/11/11 15:55 Received: 05/12/11 13:45									
1,1-Dichloropropene	ND	0.50	µg/L	1	CU03343	"	05/13/11	EPA 8260B	
cis-1,3-Dichloropropene	ND	0.50	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.50	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	0.50	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.50	"	"	"	"	"	"	
2-Hexanone	ND	10	"	"	"	"	"	"	
Isopropylbenzene	ND	0.50	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.50	"	"	"	"	"	"	
Methylene chloride	ND	0.50	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	10	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	0.50	"	"	"	"	"	"	
Naphthalene	ND	0.50	"	"	"	"	"	"	
n-Propylbenzene	ND	0.50	"	"	"	"	"	"	
Styrene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	2.9	0.50	"	"	"	"	"	"	
Toluene	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Trichloroethene	3.9	0.50	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.50	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	1.0	"	"	"	"	"	"	
Xylenes (total)	ND	1.0	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		<i>90 %</i>		<i>66-135</i>					
<i>Surrogate: Toluene-d8</i>		<i>88 %</i>		<i>72-125</i>					
<i>Surrogate: 4-Bromofluorobenzene</i>		<i>109 %</i>		<i>73-125</i>					

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-4-25' (GW) (CUE0511-09) Water Sampled: 05/11/11 17:15 Received: 05/12/11 13:45									
Acetone	ND	10	µg/L	1	CU03343	05/13/11	05/13/11	EPA 8260B	
Benzene	ND	0.50	"	"	"	"	"	"	
Bromobenzene	ND	0.50	"	"	"	"	"	"	
Bromochloromethane	ND	0.50	"	"	"	"	"	"	
Bromodichloromethane	1.1	0.50	"	"	"	"	"	"	
Bromoform	ND	0.50	"	"	"	"	"	"	
Bromomethane	ND	1.0	"	"	"	"	"	"	
2-Butanone	ND	10	"	"	"	"	"	"	
n-Butylbenzene	ND	0.50	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.50	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.50	"	"	"	"	"	"	
Chlorobenzene	ND	0.50	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Chloroform	2.6	0.50	"	"	"	"	"	"	
Chloromethane	ND	1.0	"	"	"	"	"	"	
o-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
p-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
Dibromochloromethane	ND	0.50	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	1.0	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.50	"	"	"	"	"	"	
Dibromomethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	1.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.50	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.50	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-4-25' (GW) (CUE0511-09) Water Sampled: 05/11/11 17:15 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	0.50	µg/L	1	CU03343	"	05/13/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	0.50	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	0.50	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.50	"	"	"	"	"	"	
2-Hexanone	ND	10	"	"	"	"	"	"	
Isopropylbenzene	ND	0.50	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.50	"	"	"	"	"	"	
Methylene chloride	ND	0.50	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	10	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	0.50	"	"	"	"	"	"	
Naphthalene	ND	0.50	"	"	"	"	"	"	
n-Propylbenzene	ND	0.50	"	"	"	"	"	"	
Styrene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	ND	0.50	"	"	"	"	"	"	
Toluene	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Trichloroethene	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.50	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	1.0	"	"	"	"	"	"	
Xylenes (total)	ND	1.0	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		99 %		66-135	"	"	"	"	
<i>Surrogate: Toluene-d8</i>		88 %		72-125	"	"	"	"	
<i>Surrogate: 4-Bromofluorobenzene</i>		102 %		73-125	"	"	"	"	
OHM-1-10' (GW) (CUE0511-10) Water Sampled: 05/11/11 17:40 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-1-10' (GW) (CUE0511-10) Water Sampled: 05/11/11 17:40 Received: 05/12/11 13:45									
Acetone	ND	10	µg/L	1	CU03343	05/13/11	05/13/11	EPA 8260B	
Benzene	ND	0.50	"	"	"	"	"	"	
Bromobenzene	ND	0.50	"	"	"	"	"	"	
Bromochloromethane	ND	0.50	"	"	"	"	"	"	
Bromodichloromethane	ND	0.50	"	"	"	"	"	"	
Bromoform	ND	0.50	"	"	"	"	"	"	
Bromomethane	ND	1.0	"	"	"	"	"	"	
2-Butanone	ND	10	"	"	"	"	"	"	
n-Butylbenzene	ND	0.50	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.50	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.50	"	"	"	"	"	"	
Chlorobenzene	ND	0.50	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Chloroform	1.5	0.50	"	"	"	"	"	"	
Chloromethane	ND	1.0	"	"	"	"	"	"	
o-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
p-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
Dibromochloromethane	ND	0.50	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	1.0	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.50	"	"	"	"	"	"	
Dibromomethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	1.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.50	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.50	"	"	"	"	"	"	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-1-10' (GW) (CUE0511-10) Water Sampled: 05/11/11 17:40 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	0.50	µg/L	1	CU03343	"	05/13/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	0.50	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	0.50	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.50	"	"	"	"	"	"	
2-Hexanone	ND	10	"	"	"	"	"	"	
Isopropylbenzene	ND	0.50	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.50	"	"	"	"	"	"	
Methylene chloride	ND	0.50	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	10	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	0.50	"	"	"	"	"	"	
Naphthalene	ND	0.50	"	"	"	"	"	"	
n-Propylbenzene	ND	0.50	"	"	"	"	"	"	
Styrene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	4200	50	"	100	"	"	"	"	
Toluene	ND	0.50	"	1	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloroethane	27	0.50	"	"	"	"	"	"	
Trichloroethene	ND	0.50	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.50	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	1.0	"	"	"	"	"	"	
Xylenes (total)	ND	1.0	"	"	"	"	"	"	
<hr/>									
Surrogate: 1,2-Dichloroethane-d4		104 %		66-135	"	"	"	"	
Surrogate: Toluene-d8		90 %		72-125	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		108 %		73-125	"	"	"	"	
<hr/>									
OHM-1-20' (GW) (CUE0511-11) Water Sampled: 05/11/11 18:25 Received: 05/12/11 13:45									

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-1-20' (GW) (CUE0511-11) Water Sampled: 05/11/11 18:25 Received: 05/12/11 13:45									
Acetone	ND	10	µg/L	1	CU03343	05/13/11	05/13/11	EPA 8260B	
Benzene	ND	0.50	"	"	"	"	"	"	
Bromobenzene	ND	0.50	"	"	"	"	"	"	
Bromochloromethane	ND	0.50	"	"	"	"	"	"	
Bromodichloromethane	ND	0.50	"	"	"	"	"	"	
Bromoform	ND	0.50	"	"	"	"	"	"	
Bromomethane	ND	1.0	"	"	"	"	"	"	
2-Butanone	ND	10	"	"	"	"	"	"	
n-Butylbenzene	ND	0.50	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.50	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.50	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.50	"	"	"	"	"	"	
Chlorobenzene	ND	0.50	"	"	"	"	"	"	
Chloroethane	ND	0.50	"	"	"	"	"	"	
Chloroform	0.89	0.50	"	"	"	"	"	"	
Chloromethane	ND	1.0	"	"	"	"	"	"	
o-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
p-Chlorotoluene	ND	0.50	"	"	"	"	"	"	
Dibromochloromethane	ND	0.50	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	1.0	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.50	"	"	"	"	"	"	
Dibromomethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.50	"	"	"	"	"	"	
Dichlorodifluoromethane (Freon 12)	ND	1.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloroethene	1.4	0.50	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.50	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.50	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.50	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.50	"	"	"	"	"	"	

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Volatile Organic Compounds by EPA Method 8260B

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
OHM-1-20' (GW) (CUE0511-11) Water Sampled: 05/11/11 18:25 Received: 05/12/11 13:45									
cis-1,3-Dichloropropene	ND	0.50	µg/L	1	CU03343	"	05/13/11	EPA 8260B	
trans-1,3-Dichloropropene	ND	0.50	"	"	"	"	"	"	
Ethylbenzene	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	0.50	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.50	"	"	"	"	"	"	
2-Hexanone	ND	10	"	"	"	"	"	"	
Isopropylbenzene	ND	0.50	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.50	"	"	"	"	"	"	
Methylene chloride	ND	0.50	"	"	"	"	"	"	
4-Methyl-2-pentanone	ND	10	"	"	"	"	"	"	
Methyl tert-butyl ether	ND	0.50	"	"	"	"	"	"	
Naphthalene	ND	0.50	"	"	"	"	"	"	
n-Propylbenzene	ND	0.50	"	"	"	"	"	"	
Styrene	ND	0.50	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	0.67	0.50	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.50	"	"	"	"	"	"	
Tetrachloroethene	38000	500	"	1000	"	"	"	"	
Toluene	ND	0.50	"	1	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.50	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.50	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.50	"	"	"	"	"	"	
Trichloroethene	32	0.50	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.50	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.50	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.50	"	"	"	"	"	"	
Vinyl chloride	ND	1.0	"	"	"	"	"	"	
Xylenes (total)	ND	1.0	"	"	"	"	"	"	
<i>Surrogate: 1,2-Dichloroethane-d4</i>		<i>96 %</i>	<i>66-135</i>	<i>"</i>	<i>"</i>	<i>"</i>	<i>"</i>	<i>"</i>	
<i>Surrogate: Toluene-d8</i>		<i>87 %</i>	<i>72-125</i>	<i>"</i>	<i>"</i>	<i>"</i>	<i>"</i>	<i>"</i>	
<i>Surrogate: 4-Bromofluorobenzene</i>		<i>104 %</i>	<i>73-125</i>	<i>"</i>	<i>"</i>	<i>"</i>	<i>"</i>	<i>"</i>	

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Extractable Petroleum Hydrocarbons by EPA Method 8015M - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch CU03398 - CA LUFT - orb shaker

Blank (CU03398-BLK1)				Prepared & Analyzed: 05/17/11						
Diesel	ND	1.0	mg/kg							
Motor Oil	ND	1.0	"							
Hydraulic Oil	ND	1.0	"							
Mineral Oil	ND	1.0	"							
Kerosene	ND	1.0	"							
Stoddard Solvent	ND	1.0	"							
Surrogate: <i>o</i> -Terphenyl	0.472		"	0.500		94	65-135			
LCS (CU03398-BS1)				Prepared & Analyzed: 05/17/11						
Diesel	42.0	1.0	mg/kg	50.0		84	65-135			
Surrogate: <i>o</i> -Terphenyl	0.549		"	0.500		110	65-135			
LCS Dup (CU03398-BS1)				Prepared & Analyzed: 05/17/11						
Diesel	42.6	1.0	mg/kg	50.0		85	65-135	1	30	
Surrogate: <i>o</i> -Terphenyl	0.544		"	0.500		109	65-135			
Matrix Spike (CU03398-MS1)				Source: CUE0455-01		Prepared & Analyzed: 05/17/11				
Diesel	ND	1.0	mg/kg	50.0	ND		59-138			QM-9
Surrogate: <i>o</i> -Terphenyl	0.00		"	0.500			65-135			QM-9
Matrix Spike Dup (CU03398-MS1)				Source: CUE0455-01		Prepared & Analyzed: 05/17/11				
Diesel	ND	1.0	mg/kg	50.0	ND		59-138		37	QM-9
Surrogate: <i>o</i> -Terphenyl	0.00		"	0.500			65-135			QM-9

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Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch CU03343 - EPA 5030 Water MS

Blank (CU03343-BLK1)

Prepared & Analyzed: 05/13/11

Acetone	ND	10	µg/L							
Benzene	ND	0.50	"							
Bromobenzene	ND	0.50	"							
Bromochloromethane	ND	0.50	"							
Bromodichloromethane	ND	0.50	"							
Bromoform	ND	0.50	"							
Bromomethane	ND	1.0	"							
2-Butanone	ND	10	"							
n-Butylbenzene	ND	0.50	"							
sec-Butylbenzene	ND	0.50	"							
tert-Butylbenzene	ND	0.50	"							
Carbon tetrachloride	ND	0.50	"							
Chlorobenzene	ND	0.50	"							
Chloroethane	ND	0.50	"							
Chloroform	ND	0.50	"							
Chloromethane	ND	1.0	"							
o-Chlorotoluene	ND	0.50	"							
p-Chlorotoluene	ND	0.50	"							
Dibromochloromethane	ND	0.50	"							
1,2-Dibromo-3-chloropropane	ND	1.0	"							
1,2-Dibromoethane (EDB)	ND	0.50	"							
Dibromomethane	ND	0.50	"							
1,2-Dichlorobenzene	ND	0.50	"							
1,3-Dichlorobenzene	ND	0.50	"							
1,4-Dichlorobenzene	ND	0.50	"							
Dichlorodifluoromethane (Freon 12)	ND	1.0	"							
1,1-Dichloroethane	ND	0.50	"							
1,2-Dichloroethane	ND	0.50	"							
1,1-Dichloroethene	ND	0.50	"							
cis-1,2-Dichloroethene	ND	0.50	"							
trans-1,2-Dichloroethene	ND	0.50	"							
1,2-Dichloropropane	ND	0.50	"							
1,3-Dichloropropane	ND	0.50	"							
2,2-Dichloropropane	ND	0.50	"							
1,1-Dichloropropene	ND	0.50	"							

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch CU03343 - EPA 5030 Water MS

Blank (CU03343-BLK1)

Prepared & Analyzed: 05/13/11

cis-1,3-Dichloropropene	ND	0.50	µg/L							
trans-1,3-Dichloropropene	ND	0.50	"							
Ethylbenzene	ND	0.50	"							
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	0.50	"							
Hexachlorobutadiene	ND	0.50	"							
2-Hexanone	ND	10	"							
Isopropylbenzene	ND	0.50	"							
p-Isopropyltoluene	ND	0.50	"							
Methylene chloride	ND	0.50	"							
4-Methyl-2-pentanone	ND	10	"							
Methyl tert-butyl ether	ND	0.50	"							
Naphthalene	ND	0.50	"							
n-Propylbenzene	ND	0.50	"							
Styrene	ND	0.50	"							
1,1,1,2-Tetrachloroethane	ND	0.50	"							
1,1,2,2-Tetrachloroethane	ND	0.50	"							
Tetrachloroethene	ND	0.50	"							
Toluene	ND	0.50	"							
1,2,3-Trichlorobenzene	ND	0.50	"							
1,2,4-Trichlorobenzene	ND	0.50	"							
1,1,1-Trichloroethane	ND	0.50	"							
1,1,2-Trichloroethane	ND	0.50	"							
Trichloroethene	ND	0.50	"							
Trichlorofluoromethane	ND	0.50	"							
1,2,3-Trichloropropane	ND	0.50	"							
1,2,4-Trimethylbenzene	ND	0.50	"							
1,3,5-Trimethylbenzene	ND	0.50	"							
Vinyl chloride	ND	1.0	"							
Xylenes (total)	ND	1.0	"							
Di-isopropyl ether	ND	0.50	"							
Ethyl tert-butyl ether	ND	0.50	"							
tert-Amyl methyl ether	ND	0.50	"							
tert-Butyl alcohol	ND	5.0	"							
Surrogate: 1,2-Dichloroethane-d4	7.95		"	10.0		80	66-135			
Surrogate: Toluene-d8	8.77		"	10.0		88	72-125			

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Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch CU03343 - EPA 5030 Water MS

Blank (CU03343-BLK1)

Prepared & Analyzed: 05/13/11

Surrogate: 4-Bromofluorobenzene 10.3 " 10.0 103 73-125

LCS (CU03343-BS1)

Prepared & Analyzed: 05/13/11

Benzene 19.8 0.50 µg/L 20.0 99 60-135

Chlorobenzene 18.4 0.50 " 20.0 92 60-133

1,1-Dichloroethene 20.7 0.50 " 20.0 103 42-150

Toluene 19.7 0.50 " 20.0 98 60-137

Trichloroethene 19.5 0.50 " 20.0 98 62-140

Surrogate: 1,2-Dichloroethane-d4 9.74 " 10.0 97 66-135

Surrogate: Toluene-d8 10.4 " 10.0 104 72-125

Surrogate: 4-Bromofluorobenzene 11.0 " 10.0 110 73-125

LCS Dup (CU03343-BSD1)

Prepared & Analyzed: 05/13/11

Benzene 17.6 0.50 µg/L 20.0 88 60-135 12 25

Chlorobenzene 17.7 0.50 " 20.0 89 60-133 4 25

1,1-Dichloroethene 17.2 0.50 " 20.0 86 42-150 18 25

Toluene 17.2 0.50 " 20.0 86 60-137 13 25

Trichloroethene 17.3 0.50 " 20.0 87 62-140 12 25

Surrogate: 1,2-Dichloroethane-d4 9.17 " 10.0 92 66-135

Surrogate: Toluene-d8 10.1 " 10.0 101 72-125

Surrogate: 4-Bromofluorobenzene 11.1 " 10.0 111 73-125

Matrix Spike (CU03343-MS1)

Source: CUE0478-01

Prepared & Analyzed: 05/13/11

Benzene 17.7 0.50 µg/L 20.0 ND 88 52-139

Chlorobenzene 18.2 0.50 " 20.0 ND 91 62-134

1,1-Dichloroethene 18.4 0.50 " 20.0 ND 92 32-152

Toluene 19.9 0.50 " 20.0 ND 99 58-139

Trichloroethene 17.9 0.50 " 20.0 ND 90 55-138

Surrogate: 1,2-Dichloroethane-d4 10.7 " 10.0 107 66-135

Surrogate: Toluene-d8 12.0 " 10.0 120 72-125

Surrogate: 4-Bromofluorobenzene 8.72 " 10.0 87 73-125

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Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch CU03343 - EPA 5030 Water MS

Matrix Spike Dup (CU03343-MSD1)	Source: CUE0478-01			Prepared & Analyzed: 05/13/11						
Benzene	18.9	0.50	µg/L	20.0	ND	94	52-139	7	25	
Chlorobenzene	19.0	0.50	"	20.0	ND	95	62-134	4	25	
1,1-Dichloroethene	28.8	0.50	"	20.0	ND	144	32-152	44	25	QR-1
Toluene	18.8	0.50	"	20.0	ND	94	58-139	6	25	
Trichloroethene	19.0	0.50	"	20.0	ND	95	55-138	6	25	
Surrogate: 1,2-Dichloroethane-d4	7.76		"	10.0		78	66-135			
Surrogate: Toluene-d8	9.82		"	10.0		98	72-125			
Surrogate: 4-Bromofluorobenzene	9.54		"	10.0		95	73-125			

Batch CU03449 - EPA 5030 Soil MS

Blank (CU03449-BLK1)	Prepared & Analyzed: 05/17/11									
Acetone	ND	100	µg/kg							
Benzene	ND	5.0	"							
Bromobenzene	ND	5.0	"							
Bromochloromethane	ND	5.0	"							
Bromodichloromethane	ND	5.0	"							
Bromoform	ND	5.0	"							
Bromomethane	ND	10	"							
2-Butanone	ND	100	"							
n-Butylbenzene	ND	5.0	"							
sec-Butylbenzene	ND	5.0	"							
tert-Butylbenzene	ND	5.0	"							
Carbon tetrachloride	ND	5.0	"							
Chlorobenzene	ND	5.0	"							
Chloroethane	ND	5.0	"							
Chloroform	ND	5.0	"							
Chloromethane	ND	10	"							
o-Chlorotoluene	ND	5.0	"							
p-Chlorotoluene	ND	5.0	"							
Dibromochloromethane	ND	5.0	"							
1,2-Dibromo-3-chloropropane	ND	10	"							
1,2-Dibromoethane (EDB)	ND	5.0	"							
Dibromomethane	ND	5.0	"							
1,2-Dichlorobenzene	ND	5.0	"							
1,3-Dichlorobenzene	ND	5.0	"							

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	Limits	RPD	RPD Limit	Notes
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Batch CU03449 - EPA 5030 Soil MS

Blank (CU03449-BLK1)

Prepared & Analyzed: 05/17/11

1,4-Dichlorobenzene	ND	5.0	µg/kg
Dichlorodifluoromethane (Freon 12)	ND	10	"
1,1-Dichloroethane	ND	5.0	"
1,2-Dichloroethane	ND	5.0	"
1,1-Dichloroethene	ND	5.0	"
cis-1,2-Dichloroethene	ND	5.0	"
trans-1,2-Dichloroethene	ND	5.0	"
1,2-Dichloropropane	ND	5.0	"
1,3-Dichloropropane	ND	5.0	"
2,2-Dichloropropane	ND	5.0	"
1,1-Dichloropropene	ND	5.0	"
cis-1,3-Dichloropropene	ND	5.0	"
trans-1,3-Dichloropropene	ND	5.0	"
Ethylbenzene	ND	5.0	"
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	ND	5.0	"
Hexachlorobutadiene	ND	5.0	"
2-Hexanone	ND	50	"
Isopropylbenzene	ND	5.0	"
p-Isopropyltoluene	ND	5.0	"
Methylene chloride	ND	5.0	"
4-Methyl-2-pentanone	ND	50	"
Methyl tert-butyl ether	ND	5.0	"
Naphthalene	ND	5.0	"
n-Propylbenzene	ND	5.0	"
Styrene	ND	5.0	"
1,1,2,2-Tetrachloroethane	ND	5.0	"
1,1,1,2-Tetrachloroethane	ND	5.0	"
Tetrachloroethene	ND	5.0	"
Toluene	ND	5.0	"
1,2,3-Trichlorobenzene	ND	5.0	"
1,2,4-Trichlorobenzene	ND	5.0	"
1,1,2-Trichloroethane	ND	5.0	"
1,1,1-Trichloroethane	ND	5.0	"
Trichloroethene	ND	5.0	"
Trichlorofluoromethane	ND	5.0	"

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch CU03449 - EPA 5030 Soil MS										
Blank (CU03449-BLK1)										
Prepared & Analyzed: 05/17/11										
1,2,3-Trichloropropane	ND	5.0	µg/kg							
1,3,5-Trimethylbenzene	ND	5.0	"							
1,2,4-Trimethylbenzene	ND	5.0	"							
Vinyl chloride	ND	10	"							
Xylenes (total)	ND	10	"							
Surrogate: 1,2-Dichloroethane-d4	26.7		"	30.0		89	50-125			
Surrogate: Toluene-d8	30.1		"	30.0		100	62-125			
Surrogate: 4-Bromofluorobenzene	30.0		"	30.0		100	50-128			
LCS (CU03449-BS1)										
Prepared & Analyzed: 05/17/11										
Benzene	19.8	5.0	µg/kg	20.0		99	64-135			
Chlorobenzene	18.4	5.0	"	20.0		92	67-133			
1,1-Dichloroethene	20.3	5.0	"	20.0		101	53-137			
Toluene	19.1	5.0	"	20.0		96	61-138			
Trichloroethene	20.1	5.0	"	20.0		100	64-130			
Surrogate: 1,2-Dichloroethane-d4	32.6		"	30.0		109	50-125			
Surrogate: Toluene-d8	31.9		"	30.0		106	62-125			
Surrogate: 4-Bromofluorobenzene	29.5		"	30.0		98	50-128			
LCS Dup (CU03449-BS1)										
Prepared & Analyzed: 05/17/11										
Benzene	19.7	5.0	µg/kg	20.0		98	64-135	0.9	30	
Chlorobenzene	18.9	5.0	"	20.0		94	67-133	3	30	
1,1-Dichloroethene	19.9	5.0	"	20.0		100	53-137	2	30	
Toluene	19.1	5.0	"	20.0		96	61-138	0.05	30	
Trichloroethene	19.6	5.0	"	20.0		98	64-130	2	30	
Surrogate: 1,2-Dichloroethane-d4	30.6		"	30.0		102	50-125			
Surrogate: Toluene-d8	31.4		"	30.0		105	62-125			
Surrogate: 4-Bromofluorobenzene	31.7		"	30.0		106	50-128			

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Volatile Organic Compounds by EPA Method 8260B - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch CU03449 - EPA 5030 Soil MS

Matrix Spike (CU03449-MS1)		Source: CUE0511-01		Prepared & Analyzed: 05/17/11						
Benzene	10.4	5.0	µg/kg	20.0	ND	52	58-139			QM-7
Chlorobenzene	8.83	5.0	"	20.0	ND	44	62-134			QM-7
1,1-Dichloroethene	12.1	5.0	"	20.0	ND	60	53-152			
Toluene	9.70	5.0	"	20.0	ND	48	58-139			QM-7
Trichloroethene	10.6	5.0	"	20.0	ND	53	55-138			QM-7
Surrogate: 1,2-Dichloroethane-d4	29.1		"	30.0		97	50-125			
Surrogate: Toluene-d8	30.8		"	30.0		103	62-125			
Surrogate: 4-Bromofluorobenzene	29.2		"	30.0		97	50-128			
Matrix Spike Dup (CU03449-MSD1)		Source: CUE0511-01		Prepared & Analyzed: 05/17/11						
Benzene	14.0	5.0	µg/kg	20.0	ND	70	58-139	29	30	
Chlorobenzene	10.7	5.0	"	20.0	ND	54	62-134	20	30	QM-7
1,1-Dichloroethene	18.4	5.0	"	20.0	ND	92	53-152	41	30	QM-7
Toluene	13.1	5.0	"	20.0	ND	65	58-139	30	30	
Trichloroethene	13.3	5.0	"	20.0	ND	67	55-138	23	30	
Surrogate: 1,2-Dichloroethane-d4	27.6		"	30.0		92	50-125			
Surrogate: Toluene-d8	31.5		"	30.0		105	62-125			
Surrogate: 4-Bromofluorobenzene	29.7		"	30.0		99	50-128			

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E2C Remediation (Bakersfield Office) 5300 Woodmere Drive, Suite 105 Bakersfield CA, 93313	Project: One Hour Martinizing Project Number: 1973BK Project Manager: Phil Goalwin	CLS Work Order #: CUE0511 COC #: 124170
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Notes and Definitions

- QR-1 The RPD value for the sample duplicate or MS/MSD was outside of the QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery.
- QM-9 MS/MSD recovery data could not be generated due to insufficient sample. LCS/LCSD data validate methodology.
- QM-7 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS/LCSD recovery.
- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- dry Sample results reported on a dry weight basis
- RPD Relative Percent Difference

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T015

Client: CLS

Field ID #: OHM-2

Sample Type: Air

Lab Sample ID: 11CLS19301

Date Sampled: 05112011,10:22

Concentration Units: PPBV

Date Received: 0513/2011

CLS Number: CUE0511-12

Date Analyzed: 05172011

Data Filename: 11051705.D

Time Analyzed: 1:07 pm

Dilution Factor: 958.3

Quality Control Sample

Analyte	NW	CASNUM	ML (PPBV)	Results (PPBV)	Qualifier	ML (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-85-6	960	0	U	5	0
1,1,2,2-Tetrachloroethane	166	79-34-5	960	0	U	7	0
1,1,2-Trichloroethane	132	79-00-5	960	0	U	5	0
1,2-Dibromoethane	186	106-93-4	960	0	U	7	0
1,1-Dichloroethane	98	75-34-3	960	0	U	4	0
1,1-Dichloroethene	96	75-35-1	960	0	U	4	0
1,2,4-Trichlorobenzene	180	120-82-1	960	0	U	7	0
1,2,4-Trimethylbenzene	120	95-63-6	960	0	U	5	0
1,2-Dichloroethane	98	107-06-2	960	0	U	4	0
1,2-Dichloropropane	112	78-87-5	960	0	U	4	0
1,3,5-Trimethylbenzene	120	108-67-8	960	0	U	5	0
1,3-Butadiene	54	106-99-0	960	0	U	2	0
1,2-Dichlorobenzene	148	95-50-1	960	0	U	6	0
1,3-Dichlorobenzene	146	541-73-1	960	0	U	6	0
1,4-Dichlorobenzene	148	106-46-7	960	0	U	6	0
1,4-Dioxane	88	123-91-1	960	0	U	3	0
2-Butanone	72	78-93-3	960	0	U	3	0
2-Hexanone	180	591-78-6	960	0	U	4	0
4-Ethyltoluene	120	622-96-8	960	0	U	5	0
4-Methyl-2-Pentanone	180	108-10-1	960	0	U	4	0
Acetone	88	67-64-1	1000	0	U	2	0
Benzene	78	71-43-2	1000	0	U	3	0
Benzyl Chloride	126	100-44-7	960	0	U	5	0
Bromodichloromethane	162	75-27-4	960	0	U	6	0
Bromoforn	250	75-25-2	960	0	U	10	0
Bromomethane	94	74-83-9	960	0	U	4	0
Carbon Disulfide	76	75-15-0	1000	0	U	3	0
Carbon tetrachloride	152	58-23-5	960	0	U	6	0
Chlorobenzene	112	108-90-7	960	0	U	4	0
Chloroethane	64	75-00-3	960	0	U	3	0
Chloroform	118	67-66-3	960	0	U	5	0
Chloromethane	50	74-87-3	960	0	U	2	0
cis-1,2-dichloroethene	96	156-59-2	960	0	U	4	0
cis-1,3-Dichloropropene	110	10061-01-5	960	0	U	4	0
Cyclohexane	84	110-82-7	960	0	U	3	0
Dibromochloromethane	206	124-48-1	960	0	U	8	0
Dichlorodifluoromethane	120	75-71-8	960	0	U	5	0
Ethanol	46	64-17-5	960	0	U	2	0
Ethyl Acetate	88	141-78-6	960	0	U	3	0
Ethylbenzene	106	100-41-4	960	0	U	4	0
Freon113	186	76-13-1	960	0	U	7	0
Freon114	170	76-14-2	960	0	U	7	0
Heptane	100	142-82-5	960	0	U	4	0
Hexane	86	110-54-3	960	0	U	3	0
Hexachlorobutadiene	258	87-68-3	960	0	U	10	0
Isopropyl Alcohol	60	67-63-0	960	0	U	2	0
Methylene chloride	84	75-09-2	960	0	U	3	0
Methyl tert-Butyl Ether	88	1634-04-4	960	0	U	3	0
Propene	36	115-07-1	960	0	U	1	0
Styrene	104	100-42-5	960	0	U	4	0
Tetrachloroethene	164	127-18-4	960	10500	-	6	70
Tetrahydrofuran	72	109-99-9	960	0	U	3	0
Toluene	92	108-88-3	960	0	U	4	0
trans-1,2-dichloroethene	96	156-60-5	960	0	U	4	0
trans-1,3-Dichloropropene	110	10061-02-6	960	0	U	4	0
Trichloroethene	130	79-01-6	960	0	U	5	0
Trichlorofluoromethane	136	75-69-4	960	0	U	5	0
Vinyl acetate	86	108-105-4	960	0	U	3	0
Vinyl chloride	62	75-01-4	960	0	U	2	0
Xylenes, m&p-	106	10638-8-1	960	0	U	4	0
Xylenes, o-	106	95-47-6	960	0	U	4	0
Bromochloromethane (surrogate)	128	74-97-5		102	-		
4-BFB (surrogate)	174	4610-00-4		109	-		

NOTES:

- U - Analytes not detected at, or above the stated detection limit.
- 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
- PPBV - Parts per billion volume.
- MQL - Method quantitation limit.
- Surrogate results are in units of percent recovery with control limits: 65 to 135%.

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TO15

Client: CLS
 Sample Type: Air
 Date Sampled: 05112011,10:47
 Date Received: 0513/2011
 Date Analyzed: 05172011
 Time Analyzed: 3:44 pm

Field ID #: **OHM-4**
 Lab Sample ID: 11CLS19302
 Concentration Units: PPBV
 CLS Number: *CLUE0511-13*
 Data Filename: 11051707.D
 Dilution Factor: 16.8

Quality Control Sample

Analytes	NW	CASNUM	MQL (PPBV)	Results (PPBV)	Qualifier	MQL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-55-6	17	0	U	0.09	0
1,1,2,2-Tetrachloroethane	166	79-34-5	17	0	U	0.1	0
1,1,2-Trichloroethane	132	79-00-5	17	0	U	0.09	0
1,2-Dibromoethane	186	106-93-4	17	0	U	0.1	0
1,1-Dichloroethane	98	75-34-3	17	0	U	0.07	0
1,1-Dichloroethene	96	75-35-4	17	0	U	0.07	0
1,2,4-Trichlorobenzene	180	120-82-1	17	0	U	0.1	0
1,2,4-Trimethylbenzene	120	95-63-6	17	0	U	0.08	0
1,2-Dichloroethane	98	107-06-2	17	0	U	0.07	0
1,2-Dichloropropane	112	78-87-5	17	0	U	0.08	0
1,3,5-Trimethylbenzene	120	108-67-8	17	0	U	0.08	0
1,3-Butadiene	54	106-99-0	17	0	U	0.04	0
1,2-Dichlorobenzene	146	95-50-1	17	0	U	0.1	0
1,3-Dichlorobenzene	146	541-73-1	17	0	U	0.1	0
1,4-Dichlorobenzene	146	106-46-7	17	0	U	0.1	0
1,4-Dioxane	88	123-91-1	17	0	U	0.06	0
2-Butanone	72	78-93-3	17	0	U	0.05	0
2-Hexanone	100	591-78-6	17	0	U	0.07	0
4-Ethyltoluene	120	622-96-8	17	0	U	0.08	0
4-Methyl-2-Pentanone	100	108-10-1	17	0	U	0.07	0
Acetone	58	67-64-1	17	66	=	0.04	0.16
Benzene	78	71-43-2	20	0	U	0.06	0
Benzyl Chloride	126	100-44-7	17	0	U	0.09	0
Bromodichloromethane	162	75-27-4	17	0	U	0.1	0
Bromoform	250	75-25-2	17	0	U	0.2	0
Bromomethane	94	74-83-5	17	0	U	0.07	0
Carbon Disulfide	76	75-15-0	20	0	U	0.06	0
Carbon tetrachloride	152	56-23-5	17	0	U	0.1	0
Chlorobenzene	112	108-90-7	17	0	U	0.08	0
Chloroethane	64	75-00-3	17	0	U	0.04	0
Chloroform	118	67-66-3	17	0	U	0.08	0
Chloromethane	50	74-87-3	17	0	U	0.03	0
cis-1,2-dichloroethene	96	156-59-1	17	0	U	0.07	0
cis-1,3-Dichloropropene	110	10961-01-5	17	0	U	0.08	0
Cyclohexane	84	110-82-7	17	0	U	0.06	0
Dibromochloromethane	206	124-48-1	17	0	U	0.1	0
Dichlorodifluoromethane	120	75-71-8	17	0	U	0.08	0
Ethanol	46	64-17-5	17	0	U	0.03	0
Ethyl Acetate	88	141-78-6	17	0	U	0.06	0
Ethylbenzene	106	100-41-4	17	0	U	0.07	0
Freon113	186	76-13-1	17	0	U	0.1	0
Freon114	170	76-14-2	17	0	U	0.1	0
Heptane	100	142-82-5	17	0	U	0.07	0
Hexane	86	110-54-3	17	0	U	0.06	0
Hexachlorobutadiene	258	87-68-3	17	0	U	0.2	0
Isopropyl Alcohol	60	67-63-0	17	0	U	0.04	0
Methylene chloride	84	75-09-2	17	0	U	0.06	0
Methyl tert-Butyl Ether	88	1634-04-4	17	0	U	0.06	0
Propene	36	115-07-1	17	0	U	0.03	0
Styrene	104	100-42-5	17	0	U	0.07	0
Tetrachloroethene	164	127-18-4	17	116	=	0.1	0.78
Tetrahydrofuran	72	109-99-9	17	0	U	0.05	0
Toluene	92	108-88-3	17	0	U	0.06	0
trans-1,2-dichloroethene	96	156-60-5	17	0	U	0.07	0
trans-1,3-Dichloropropene	110	10961-02-6	17	0	U	0.08	0
Trichloroethene	130	79-01-6	17	0	U	0.09	0
Trichlorofluoromethane	136	75-69-4	17	0	U	0.09	0
Vinyl acetate	86	108-05-4	17	0	U	0.06	0
Vinyl chloride	62	75-01-4	17	0	U	0.04	0
Xylenes, m&p-	106	106-38-3 & 106-42-3	17	0	U	0.07	0
Xylenes, o-	106	95-47-6	17	0	U	0.07	0
Bromochloromethane (surrogate)	128	74-97-5		99	=		
4-BFB(surrogate)	174	460-00-4		128	=		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
 PPBV - Parts per billion volume.
 MQL - Method quantitation limit.
 Surrogate results are in units of percent recovery with control limits: 65 to 135%.

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T015

Client: CLS
 Sample Type: Air
 Date Sampled: 05/12/2011, 11:11
 Date Received: 05/13/2011
 Date Analyzed: 05/17/2011
 Time Analyzed: 6:55 pm

Field ID #: OHM-1
 Lab Sample ID: 11CLS19303
 Concentration Units: PPBV
 CLS Number: CUE0511-14
 Data Filename: 11051711.D
 Dilution Factor: 30854.0

Quality Control Sample

Analytes	MW	CASNUM	MQL (PPBV)	Results (PPBV)	Qualifier	MQL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-85-6	31000	0	U	200	0
1,1,2,2-Tetrachloroethane	166	79-34-5	31000	0	U	200	0
1,1,2-Trichloroethane	132	79-06-5	31000	0	U	200	0
1,2-Dibromoethane	186	106-93-4	31000	0	U	200	0
1,1-Dichloroethane	98	75-34-3	31000	0	U	100	0
1,1-Dichloroethene	96	75-35-4	31000	0	U	100	0
1,2,4-Trichlorobenzene	180	120-82-1	31000	0	U	200	0
1,2,4-Trimethylbenzene	120	95-63-6	31000	0	U	200	0
1,2-Dichloroethane	98	107-06-2	31000	0	U	100	0
1,2-Dichloropropane	112	78-87-5	31000	0	U	100	0
1,3,5-Trimethylbenzene	120	108-67-8	31000	0	U	200	0
1,3-Butadiene	54	106-99-0	31000	0	U	70	0
1,2-Dichlorobenzene	146	95-50-1	31000	0	U	200	0
1,3-Dichlorobenzene	146	541-73-1	31000	0	U	200	0
1,4-Dichlorobenzene	146	106-46-7	31000	0	U	200	0
1,4-Dioxane	88	123-91-1	31000	0	U	100	0
2-Butanone	72	78-93-3	31000	0	U	90	0
2-Hexanone	100	591-78-6	31000	0	U	100	0
4-Ethyltoluene	120	622-96-8	31000	0	U	200	0
4-Methyl-2-Pentanone	100	108-10-1	31000	0	U	100	0
Acetone	58	67-64-1	30000	0	U	70	0
Benzene	78	71-43-2	30000	0	U	100	0
Benzyl Chloride	126	100-44-7	31000	0	U	200	0
Bromodichloromethane	162	75-27-4	31000	0	U	200	0
Bromoform	250	75-25-2	31000	0	U	100	0
Bromomethane	94	74-83-9	31000	0	U	100	0
Carbon Disulfide	76	75-15-0	30000	0	U	90	0
Carbon tetrachloride	152	56-23-5	31000	0	U	200	0
Chlorobenzene	112	108-90-7	31000	0	U	100	0
Chloroethane	64	75-00-5	31000	0	U	80	0
Chloroform	118	67-66-3	31000	0	U	100	0
Chloromethane	50	74-87-3	31000	0	U	60	0
cis-1,2-dichloroethene	96	156-59-2	31000	0	U	100	0
cis-1,3-Dichloropropene	110	10061-01-5	31000	0	U	100	0
Cyclohexane	84	110-82-7	31000	0	U	100	0
Dibromochloromethane	206	124-48-1	31000	0	U	300	0
Dichlorodifluoromethane	120	75-71-8	31000	0	U	200	0
Ethanol	46	64-17-5	31000	0	U	60	0
Ethyl Acetate	88	141-78-6	31000	0	U	100	0
Ethylbenzene	106	100-41-4	31000	0	U	100	0
Freon 113	186	76-13-1	31000	0	U	200	0
Freon 114	170	76-14-2	31000	0	U	200	0
Heptane	100	142-82-5	31000	0	U	100	0
Hexane	86	110-54-3	31000	0	U	100	0
Hexachlorobutadiene	258	87-69-3	31000	0	U	300	0
Isopropyl Alcohol	60	67-63-0	31000	0	U	80	0
Methylene chloride	84	75-09-2	31000	0	U	100	0
Methyl tert-Butyl Ether	88	1634-04-4	31000	0	U	100	0
Propene	36	115-07-1	31000	0	U	50	0
Styrene	104	100-42-5	31000	0	U	100	0
Tetrachloroethene	164	127-18-4	31000	147000	=	200	990
Tetrahydrofuran	72	109-99-9	31000	0	U	90	0
Toluene	92	108-88-3	31000	0	U	100	0
trans-1,2-dichloroethene	96	156-60-5	31000	0	U	100	0
trans-1,3-Dichloropropene	110	10061-02-6	31000	0	U	100	0
Trichloroethene	130	79-01-6	31000	0	U	200	0
Trichlorofluoromethane	136	75-69-4	31000	0	U	200	0
Vinyl acetate	86	108-05-4	31000	0	U	100	0
Vinyl chloride	62	75-01-4	31000	0	U	80	0
Xylenes, m&p	106	106-38-3 & 106-41-3	31000	0	U	100	0
Xylenes, o-	106	95-47-6	31000	0	U	100	0
Bromochloromethane (surrogate)	128	74-97-5		100	=		
4-BFB(surrogate)	174	460-00-4		105	=		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
 PPBV - Parts per billion volume.
 MQL - Method quantitation limit.

Smart Chemistry Corporation

3402 La Grande Blvd. Sacramento, CA 95823, (916)391-3300, (916)391-3440 (fax), www.smartchemistry.com, jpk@smartchemistry.com

TO15

Client: CLS
 Sample Type: Air
 Date Sampled: 05/12/2011, 11:46
 Date Received: 05/13/2011
 Date Analyzed: 05/17/2011
 Time Analyzed: 7:53 pm

Field ID #: **OHM-3**
 Lab Sample ID: 11CLS19304
 Concentration Units: PPBV
 CLS Number: CUE0511-15
 Data Filename: 11051712.D
 Dilution Factor: 806.0

Quality Control Sample

Analytes	MW	CASNUM	MQL (PPBV)	Results (PPBV)	Qualifier	MQL (ug/L)	Results (ug/L)
1,1,1-Trichloroethane	132	71-55-6	810	0	U	4	0
1,1,2,2-Tetrachloroethane	166	79-34-5	810	0	U	6	0
1,1,2-Trichloroethane	132	79-09-5	810	0	U	4	0
1,2-Dibromoethane	186	106-93-4	810	0	U	6	0
1,1-Dichloroethane	98	75-34-3	810	0	U	3	0
1,1-Dichloroethene	96	75-35-4	810	0	U	3	0
1,2,4-Trichlorobenzene	180	120-82-1	810	0	U	6	0
1,2,4-Trimethylbenzene	120	95-63-6	810	0	U	4	0
1,2-Dichloroethane	98	107-06-2	810	0	U	3	0
1,2-Dichloropropane	112	78-87-5	810	0	U	4	0
1,3,5-Trimethylbenzene	120	108-67-8	810	0	U	4	0
1,3-Butadiene	54	106-99-0	810	0	U	2	0
1,2-Dichlorobenzene	146	95-50-1	810	0	U	5	0
1,3-Dichlorobenzene	146	541-73-1	810	0	U	5	0
1,4-Dichlorobenzene	146	106-46-7	810	0	U	5	0
1,4-Dioxane	88	123-91-1	810	0	U	3	0
2-Butanone	72	78-93-3	810	0	U	2	0
2-Hexanone	100	591-78-6	810	0	U	3	0
4-Ethyltoluene	120	622-96-8	810	0	U	4	0
4-Methyl-2-Pentanone	100	108-10-1	810	0	U	3	0
Acetone	58	67-64-1	800	0	U	2	0
Benzene	78	71-43-2	800	0	U	3	0
Benzyl Chloride	126	100-44-7	810	0	U	4	0
Bromodichloromethane	162	75-27-4	810	0	U	5	0
Bromoform	250	75-25-2	810	0	U	8	0
Bromomethane	94	74-83-9	810	0	U	3	0
Carbon Disulfide	76	75-15-0	800	0	U	2	0
Carbon tetrachloride	152	56-23-5	810	0	U	5	0
Chlorobenzene	112	108-90-7	810	0	U	4	0
Chloroethane	64	75-00-1	810	0	U	2	0
Chloroform	118	67-66-3	810	0	U	4	0
Chloromethane	50	74-87-3	810	0	U	2	0
cis-1,2-dichloroethene	96	156-59-2	810	0	U	3	0
cis-1,3-Dichloropropene	110	10061-01-5	810	0	U	4	0
Cyclohexane	84	110-82-7	810	0	U	3	0
Dibromochloromethane	206	124-48-1	810	0	U	7	0
Dichlorodifluoromethane	120	75-71-8	810	0	U	4	0
Ethanol	46	64-17-5	810	0	U	2	0
Ethyl Acetate	88	141-78-6	810	0	U	3	0
Ethylbenzene	106	100-41-4	810	0	U	4	0
Freon113	186	76-13-1	810	0	U	6	0
Freon114	170	76-14-2	810	0	U	6	0
Heptane	100	142-82-5	810	0	U	3	0
Hexane	86	110-54-3	810	0	U	3	0
Hexachlorobutadiene	258	87-68-3	810	0	U	9	0
Isopropyl Alcohol	60	67-63-0	810	0	U	2	0
Methylene chloride	84	75-09-2	810	0	U	3	0
Methyl tert-Butyl Ether	88	1634-04-4	810	0	U	3	0
Propene	36	115-07-1	810	0	U	1	0
Styrene	104	100-42-5	810	0	U	3	0
Tetrachloroethene	164	127-18-4	810	8530	=	5	57
Tetrahydrofuran	72	109-99-9	810	0	U	2	0
Toluene	92	108-88-3	810	0	U	3	0
trans-1,2-dichloroethene	96	156-60-5	810	0	U	3	0
trans-1,3-Dichloropropene	110	10061-02-6	810	0	U	4	0
Trichloroethene	130	79-01-6	810	0	U	4	0
Trichlorofluoromethane	136	75-69-4	810	0	U	5	0
Vinyl acetate	86	108-05-4	810	0	U	3	0
Vinyl chloride	62	75-01-4	810	0	U	2	0
Xylenes, m&p-	106	106-38-3 & 106-42-3	810	0	U	4	0
Xylenes, o-	106	95-47-6	810	0	U	4	0
Bromochloromethane (surrogate)	128	74-97-5		99	=		
4-BFB(surrogate)	174	460-00-4		105	=		

NOTES:

U - Analytes not detected at, or above the stated detection limit.
 0 - A result of zero represents an undetected result at the MQL reported and does not imply an actual value.
 PPBV - Parts per billion volume.
 MQL - Method quantitation limit.
 Surrogate results are in units of percent recovery with control limits: 65 to 135%.

SUBCONTRACT ORDER

CUE0511

SENDING LABORATORY:

CLS Labs
3249 Fitzgerald Rd.
Rancho Cordova, CA 95742
Phone: 916-638-7301
Fax: 916-638-4510
Project Manager: Mark Smith

RECEIVING LABORATORY:

SMART CHEMISTRY
3401 La Grande Blvd.Rd.
Sacramento, CA 95823
Phone :(916) 391-3300
Fax: (916) 367-6777

Analysis	TAT	Due	Expires	Laboratory ID	Sample Date	Received	Matrix
TO-15 (SUB)	10	05/26/11 12:00	05/25/11 10:22	CUE0511-12	05/11/11 10:22	05/12/11 13:45	Air

Client sample ID: OHM-2
Laboratory sample ID: CUE0511-12
Please use client sample ID on all reports

Sampler:

Containers Supplied:
Summa Cannister (A)

TO-15 (SUB)	10	05/26/11 12:00	05/25/11 10:47	CUE0511-13	05/11/11 10:47	05/12/11 13:45	Air
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Client sample ID: OHM-4
Laboratory sample ID: CUE0511-13
Please use client sample ID on all reports

Sampler:


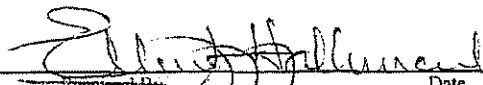
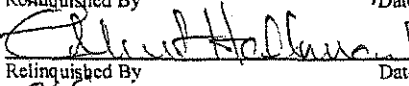
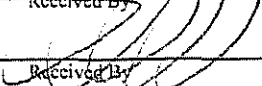
Containers Supplied:
Summa Cannister (A)

TO-15 (SUB)	10	05/26/11 12:00	05/25/11 11:11	CUE0511-14	05/11/11 11:11	05/12/11 13:45	Air
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Client sample ID: OHM-1
Laboratory sample ID: CUE0511-14
Please use client sample ID on all reports

Sampler:

Containers Supplied:
Summa Cannister (A)

Relinquished By		Date	5/13/11	Received By		Date	05/13/11
Relinquished By		Date	05/13/11	Received By		Date	05/13/2011

Shipped By _____ Airbill Number _____

SUBCONTRACT ORDER

CUE0511

Analysis	TAT	Due	Expires	Laboratory ID	Sample Date	Received	Matrix
TO-15 (SUB)	10	05/26/11 12:00	05/25/11 11:46	CUE0511-15	05/11/11 11:46	05/12/11 13:45	Air

Client sample ID: OHM-3

Sampler:

Laboratory sample ID: CUE0511-15

Please use client sample ID on all reports

Containers Supplied:

Summa Cannister (A)

Relinquished By <i>[Signature]</i>	Date 5/13/11	Received By <i>[Signature]</i>	Date 05/13/11
Relinquished By <i>[Signature]</i>	Date 05/13/11	Received By <i>[Signature]</i>	Date 05/13/2011
Shipped By <i>[Signature]</i>	Airbill Number	Page 2 of 2	

APPENDIX C

GE&R Site Investigation Workplan



GENESIS ENGINEERING & REDEVELOPMENT

SITE INVESTIGATION WORK PLAN

712 Madison Street Property

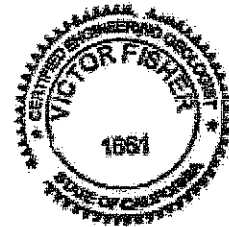
Prepared For:

Isola Law Group, LLP
405 West Pine Street
Lodi, California 95240

Prepared By:

Genesis Engineering & Redevelopment
351 Ruess Road
Ripon, California 95366

February 2, 2011



Stephen J. Van der Hoven, Ph.D.
Senior Project Manager

Victor Fisher, Ph.D., P.G., C.E.G.
Principal Geologist

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1.0 INTRODUCTION

This Work Plan was prepared on behalf of Isola Law Group, LLP to conduct an investigation on the property at 712 Madison Street in Fairfield, CA (see Figures 1 and 2). The property was formerly occupied by One Hour Martinizing from 1959 to 1988. This Work Plan is designed to assess whether past site operations have impacted the soil, soil gas, and groundwater at the property.

2.0 SITE INVESTIGATION

The following four sampling locations have been selected on the east and north sides of the building on the 712 Madison Street property (see Figure 3).

1. A few feet from the door on the east side of the building where dry cleaning fluids were reported to have been discharged (OHM-1);
2. Along the east side of the building approximately half way between the door and the south property line (OHM-2);
3. Along the east side of the building close to the southern property line (OHM-3); and
4. Adjacent to the sewer line to the north where the lateral from the property connects to the main line (OHM-4).

The following samples will be collected at each of the four locations:

1. **Soil** – One soil sample from undisturbed soils in the unsaturated zone immediately below the asphalt subgrade;
2. **Soil Gas** – One soil gas sample from undisturbed soils in the unsaturated zone; and
3. **Groundwater** – One groundwater sample will be collected from the shallow water bearing unit.

All samples will be analyzed for VOCs using Method 8260B.

3.0 FIELD ACTIVITIES

3.1 Pre-Field Activities

The following pre-field activities will be conducted prior to advancing the reconnaissance borings.

1. Marking and clearing proposed boring locations of subsurface utilities and other obstructions using a subsurface locator company;
2. Preparing a site-specific Health and Safety Plan; and
3. Maintaining contact with county agencies and property owners as to drilling schedules and other work activities.

3.2 Soil Characterization

Soil samples will be collected from undisturbed material in the first 6 inches below the asphalt subgrade. A hole will be cut in the asphalt, and a hand auger used to remove the asphalt subgrade. Once the subgrade has been removed, direct push drilling will be used to collect a sample. The sampling rod will be fitted with an inner brass sleeve. After recovery, Teflon sheets will be placed on either end of the brass sleeve, and plastic caps placed over the Teflon sheets to seal the sample.

3.3 Soil Gas Characterization

Soil gas samples will be collected from a depth of approximately 2 feet bgs, within the undisturbed soils beneath the asphalt parking lot subgrade fill and above the water table. Direct push drilling will be used to advance the borehole to the appropriate depth. A 1-inch long stainless steel vapor screen, attached to ¼ inch Teflon tubing will be set at the target depth. Six inches of sand will be placed below the screen and six inches of sand will be placed above the screen. The annular space above the sand will be sealed with granular bentonite, hydrated in six inch lifts. The assembly will be allowed to equilibrate for 30 minutes. Prior to the collection of a soil gas sample, the system will be purged of 3 volumes of air to remove any atmospheric gases and insure that the sample will be representative of undisturbed soil gases. After purging, a 400 mL sample of soil gas will be collected in a pre-evacuated SUMMA® canister equipped with a regulator to control the flow of gases into the container.



3.4 Groundwater Characterization

Groundwater samples will be collected using direct push drilling to advance borings for collecting grab groundwater samples. At each location, a groundwater sample will be collected from depths of approximately 25 feet bgs. The lithology in the borehole will be continuously logged, and the exact groundwater sampling depth chosen based on the lithology encountered.

3.5 Drilling, Logging, and Sampling Techniques

All drilling activities will conform to state and local regulations and will be coordinated by a California Professional Geologist.

Direct push drilling technology will be used to advance the reconnaissance borings. The direct push drilling process consists of a truck mounted or limited access hydraulic system used to push a 4-foot long, 2-inch diameter hollow rod into the subsurface. A 1.75-inch diameter vinyl acetate plastic sample sleeve is inserted into the rod to collect continuous 4-foot long soil samples. The soils brought to the surface in the sample sleeves for the intermediate depth boring at each boring pair will be continuously logged to the maximum depth of the hole.

Groundwater samples will be collected utilizing a direct push screen driven into the undisturbed soils ahead of the borehole. At the selected depth interval, the drill rod will be retracted, exposing the well screen. Water will be allowed to enter the well screen. A groundwater sample will be collected using a disposable bailer and decanted into the laboratory supplied sample bottles.

Soil cuttings will be placed in DOT rated drums, labeled, and moved to a common drum staging area. Soil cuttings will be disposed of in accordance with the procedure in Section 3.6.

All direct push boreholes will be abandoned according to state and county guidelines. Completed boreholes will be grouted from the bottom up using a tremie pipe with a high-solids bentonite grout or bentonite Hole Plug®. The borehole will be backfilled to within 1-foot of the ground surface. Based on the existing surface material, a concrete, asphalt, or soil plug will be installed at the surface of each boring location.

3.5.1 Subsurface Logging

The Site geologist will log the subsurface conditions encountered in all of the Site borings; recording the information on a Drilling Log Form. Borings shall be logged as follows.



- Descriptions of the soils will be in accordance with the Unified Soil Classification System (USCS) (ASTM D2488), with color descriptions made using a Munsell Color Chart.
- Soil descriptions follow the name of the predominant particle size.
- Dimensions of the predominant and secondary sizes shall be estimated.

Additional information that will be entered on the Drilling Log Form includes:

- Boring identification,
- Location in relation to an easily identifiable landmark,
- Name of drilling contractor,
- Drilling method,
- Depth at which saturated conditions are first encountered,
- Sample depths,
- Zones of caving or heaving,
- Drilling rig reactions such as chattering, rod drops, and bouncing, and
- Refusal.

3.5.2 Decontamination Activities

All equipment that may directly or indirectly contact samples will be decontaminated prior to use. This includes drill bits, drill rods, the portion of drill rig that stands above the borehole, sampling devices, and instruments such as borehole depth sounders. In addition, care will be taken to prevent samples and sampling equipment from coming into contact with potentially contaminating substances such as fugitive dust, tape, oil, engine exhaust, corroded surfaces, dirt, or any airborne source of contamination. A temporary decontamination station shall be set up at the Site to contain decontamination water. Decontamination water will be containerized in DOT rated drums, or equivalent.

Field Equipment Decontamination

The following procedures will be used to decontaminate all large pieces of equipment, such as drill rods.

1. External surfaces of equipment will be washed with high-pressure hot water and Alconox™. In some cases, more vigorous decontamination procedures, such as scrubbing, will be required if visible material remains on the downhole drilling tools after high-pressure washing.
2. Equipment will be thoroughly rinsed with potable water. This decontamination procedure will be performed before equipment is used and between each boring location.

3. Decontamination solutions will be accumulated and containerized in DOT rated drums, or equivalent, for further characterization and disposal.

Sampling Equipment Decontamination

The following procedures will be used to decontaminate sediment sampling equipment.

1. New disposable gloves will be used for each decontamination procedure to prevent cross-contamination of equipment.
2. Equipment will be scrubbed with brushes using a solution of Alconox™ and potable water. Equipment will be triple rinsed with potable water.
3. If the sampling device is not going to be used immediately, it will be wrapped in oil free aluminum foil with the shiny side out. Sampling equipment used to collect samples for organic analyses will not be allowed to come into direct contact with plastic.
4. Sampling equipment that is not readily decontaminated will be discarded after each use. Discarded decontamination solutions will be accumulated and containerized in DOT rated drums, or equivalent, for further characterization and disposal.

Groundwater sampling will be performed using new disposable equipment (i.e., bailer, etc.); therefore, decontamination of groundwater sampling equipment is limited to the rod used to deliver the bailer to the groundwater interface. The rod will be decontaminated as discussed above for the sediment sampling equipment.

Field Instrument Decontamination

The following procedure will be used to decontaminate groundwater field parameter testing equipment and organic vapor analyzers.

1. Equipment, or portions of equipment, which are water resistant will be scrubbed with a solution of Alconox™ and distilled water. Equipment will be rinsed with potable water followed by a rinse with distilled water.
2. Equipment, or portions of equipment, which are not water resistant will be repeatedly wiped with a paper towel moistened with a solution of Alconox™ and distilled water until clean.

3. Discarded decontamination solutions will be accumulated and containerized in DOT rated drums, or equivalent, for further characterization and disposal.

3.6 Investigation Derived Wastes

Investigation Derived Wastes (“IDW”) such as: soil cuttings, excess sample material, decontamination rinsate, disposable personal protective equipment, sampling equipment, and other waste solids and liquids will be stored in DOT rated drums, pending waste characterization and classification. Waste classification samples will be collected from each drum on the last day of field activities, and submitted to the laboratory for expedited analysis. Drums will be appropriately labeled following receipt of characterization and classification of wastes. It is estimated that within 10 days following the completion of field activities all investigation-derived waste will be transported to the appropriate off-site disposal facility by a transporter meeting all certification and licensing requirements of the State of California.

3.7 Boring Locations and Surveying

Upon completion of the proposed borings, geographic locations will be set using a measuring tape with respect to fixed locations. A licensed surveyor will survey boring locations horizontally with the California State Plane coordinates and vertically with the USGS 1929 datum. Additional site landmarks will also be surveyed.

3.8 Sample Handling

3.8.1 Sample Labels

A sample label will be completed and attached to each sample container. Labels are made of a waterproof material backed with a water-resistant adhesive. Labels will be filled out using indelible ink and will contain:

- Sample Number,
- Date and Time that the Sample was Collected,
- Site Name and Location,
- Sample Preservative, and
- Sampler’s Initials.

The sample labels will be placed on the bottles so as not to obscure any QA/QC data. Field identification must be sufficient to allow easy cross-reference with the field logbook.

3.8.2 Handling and Shipping

The labeled and sealed sample containers will be placed in plastic bags (e.g., Ziploc® bags) and sealed. Glass containers will be wrapped in bubble wrap before being placed in the sealed plastic bag. Bagged sample containers will be placed in the bottom of the cooler and arranged so that they do not touch. Bagged sample containers will be packed between double plastic-bagged ice and additional packing material to prevent breakage. Samples will be placed so as to maintain a temperature of approximately $4^{\circ}\text{C} \pm 2$ degrees during shipment. Chain-of-Custody Records will be sealed in plastic bags and taped to the inside of the cooler lid.

The lid of the cooler will be taped shut and sealed with two custody seals. Samples shall be shipped directly to the laboratory by overnight courier on the day they were collected. The laboratory will be notified by phone or by FAX of the sample shipment schedule, air bill number, and arrival time. Samples will be shipped to the laboratory within a time frame to allow for extraction and analysis to be performed within acceptable holding times. No samples will be held on-site for more than 24 hours.

3.8.3 Sample Size, Preservation, Holding Time

The following sample containers, preservatives, and holding times will be used for the various matrices and constituents.

Soil Samples

Constituent	Sample Container	Sample Quantity	Preservative	Holding Time
VOC	brass sample sleeves (sealed at both ends)	6 inches of sample sleeve	Ice, cool to 4°C	14 days

Groundwater Samples

Constituent	Sample Container	Sample Quantity	Preservative	Holding Time
VOC	Glass VOA vial	15 mL	HCl, Ice, cool to 4°C	14 days

3.8.4 Sample Control

This section describes sample control procedures, including Chain-of-Custody documents and custody seal.

Chain-of-Custody Record

All samples submitted to the analytical laboratory will be accompanied by a Chain-of-Custody document to record points of sample handing. Chain-of-Custody forms will be prepared for groups of samples collected at a given location on a given day. Each form will be prepared in triplicate, and one of the three copies will accompany the samples to the laboratory. One copy will be kept in the QA/QC file and another copy will be retained in the project file. The Chain-of-Custody form makes provision for documenting sample integrity and the identity of any personnel involved in sample transfer. Information on the Chain-of-Custody consists of the following:

- Project name and number
- Chain-of-Custody serial number
- Project location
- Sample numbers
- Sampler/recorder's signature
- Date and time of collection of each sample
- Sample type
- Analyses requested
- Name of person receiving the sample
- Date of receipt of sample
- Name, address, and telephone number of laboratory

Sample coolers will be sealed in the field with the completed Chain-of-Custody document inside the cooler and the express shippers (e.g., Federal Express) shipment forms filled out in the field and attached to the cooler at that time. The Chain-of-Custody record will have the signature of the relinquishing field geologist and the shipper's form document tracking number written on the comment line.

The completed Chain-of-Custody form will be placed in a plastic bag and taped to the underside of the cooler lid. The cooler will be tightly bound with filament tape. Custody seals will be signed by the individual relinquishing custody and affixed in such a way that the cooler cannot be opened without breaking the seals.

3.8.5 Quality Control Samples

Quality Control samples are collected and analyzed for the purpose of assessing the quality of the sampling effort and the analytical data. Quality Control samples include trip blanks, equipment blanks, and field duplicates. The type, description, preparation and collection, and frequency of Quality Control samples are described below.

Trip Blank

A trip blank is Type II reagent grade water, or better, that is kept with the field sample containers from the time they leave the laboratory until the time they are returned to the laboratory. The purpose of the trip blank is to evaluate possible cross-contamination of aqueous samples during transit or sample collection. Trip blanks pertain only to volatile organic analyses. Therefore the containers must contain no headspace. Only one trip blank is used per sample container/cooler.

Equipment Blank

An equipment blank is a sample of the final rinse water following equipment decontamination. Equipment blanks are usually analyzed for the same parameters as the samples at that location. Equipment blanks will be collected at a frequency of 1 per 20 or fewer field samples (5%).

Matrix Spike/Matrix Spike Duplicate

Samples will be prepared for Matrix Spike/Matrix Spike Duplicates at a frequency of 1 per 20 or fewer field samples (5%).

Duplicate Samples

A duplicate sample is a single sediment sample divided into two equal parts or two groundwater samples collected independently at a single sampling location. Field duplicates will be identified so that laboratory personnel are unable to distinguish them from field samples. Duplicate samples will be collected at a frequency of 1 per every 10 or fewer (10%) field samples per matrix; with a minimum of one duplicate sample collected per sampling day. Duplicate samples are to be analyzed utilizing the same types of analyses as their associated field samples.

4.0 FIELD QUALITY CONTROL PROGRAM

Field quality control will be provided through strict adherence to sampling protocol and decontamination procedures.

4.1 Control Parameters

Control parameters of the field procedures consist of the same controls that govern analytical data. These parameters are controlled through the assessment of data by precision, accuracy, representativeness, and completeness. Control parameters consist of the following:

- Decontamination of field equipment
- Strict adherence to sampling protocol

4.2 Corrective Actions

Specific corrective actions for field measurements will be documented in the field notes and reported to the Project Manager.

5.0 RECORD KEEPING

All pertinent Project information shall be recorded in a hardbound field logbook with pre-numbered pages. Field logbooks will be used to record all data collection activities performed onsite. Each logbook will be identified by a project-specific number. The cover of each logbook will contain the following information.

- Project Number
- Project Name
- Book Number
- Start Date
- End Date

At the beginning of each day, the start time, weather, field personnel present, level of personnel protection, and name of the person making the entry will be recorded. All information pertinent to the sampling event will be recorded. Entries into the field logbook will include the minimum, as appropriate to the activity:

- Description of the sampling location
- Name(s) and title(s) of the field crew
- Name(s) and title(s) of site visitors
- Type of media being sampled or measured
- Sample/groundwater depth
- Sample collection or measurement method
- Volume of water purged (if appropriate)
- Number and volume or sample(s) collected
- Description of sample (i.e., grain size, sorting, color, turbidity etc.)
- Date and time of collection
- Unique sample identification number
- Duplicate sample cross-reference identification
- Sample preservative
- References to maps
- Field measurements
- References to all pertinent data collection forms



If the field data is recorded on an appropriate data collection form, then all the data need not be recorded in the logbook. A brief description of the sampling data along with the reference to the data forms used will be recorded to ensure that the field data forms can be referenced to the specific logbook entry.

In addition to field logbooks, field personnel will complete other records of field activities, as appropriate. A list of the appropriate forms, as well as a brief summary of information to be recorded follows:

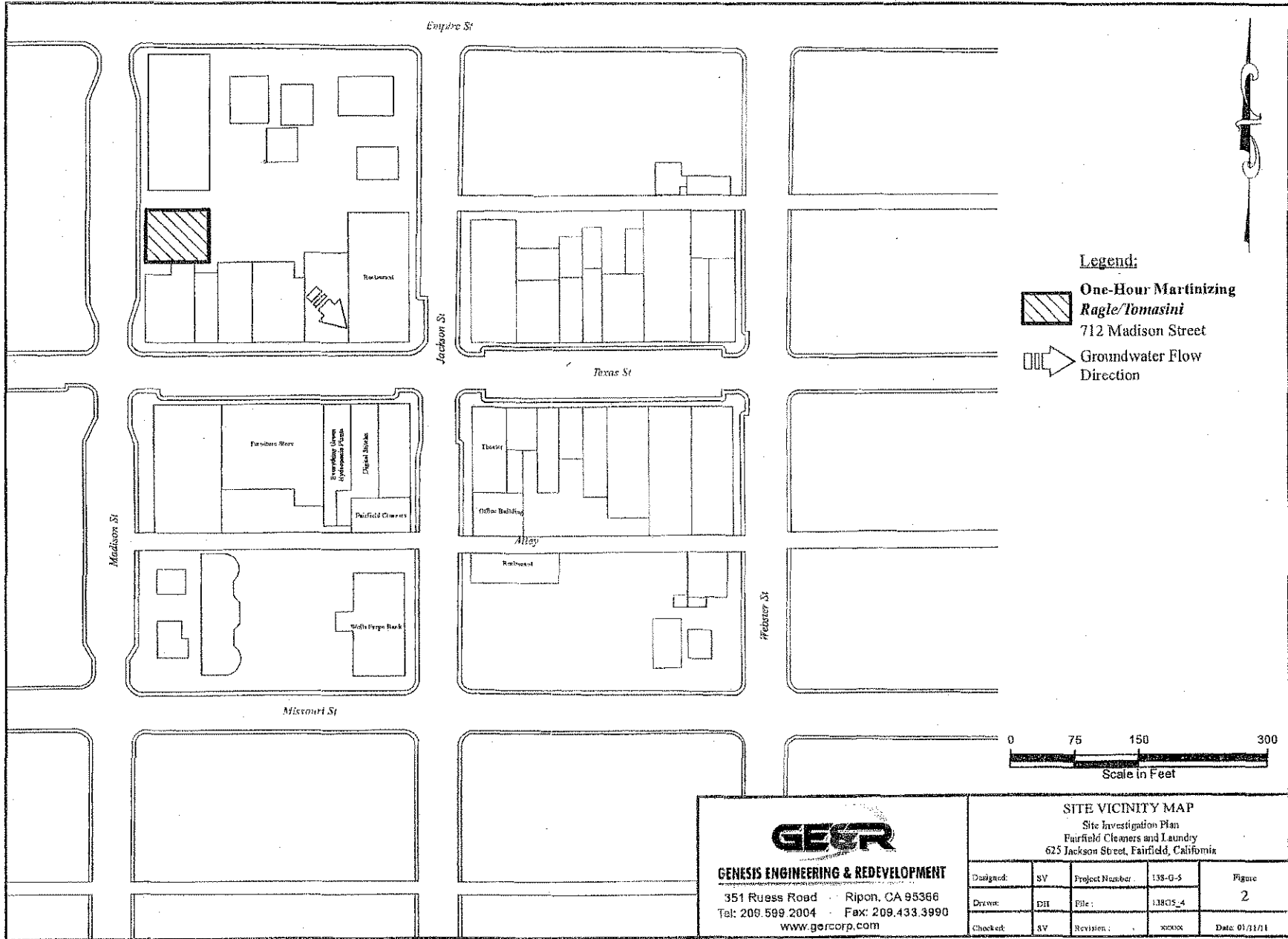
- Boring Log Form – description of subsurface conditions at boring locations
- Chain-of-Custody Record – instructions to the laboratory as to the appropriate analytical method(s) for each sample

Recorded information shall summarize, organize, and/or clarify data. If corrections are necessary, these shall be made by drawing a single line through the original entry (in such a manner that the original entry can still be read). The corrected entry shall be written alongside the corrections and shall be initialed and dated. Completed forms will be provided in the draft and final Site Investigation reports.





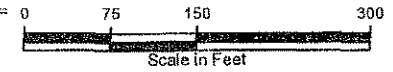
GENESIS ENGINEERING & REDEVELOPMENT

FIGURES



Legend:

-  **One-Hour Martinizing Ragle/Tomasini**
712 Madison Street
-  **Groundwater Flow Direction**



GENESIS ENGINEERING & REDEVELOPMENT
 351 Ruess Road Ripon, CA 95386
 Tel: 209.599.2004 Fax: 209.433.3990
 www.gecorp.com

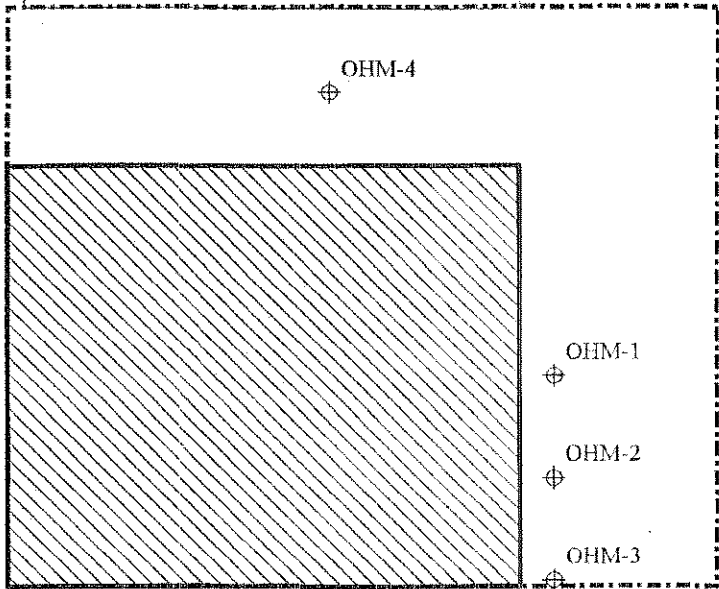
SITE VICINITY MAP

Site Investigation Plan
 Fairfield Cleaners and Laundry
 625 Jackson Street, Fairfield, California




Designed:	SV	Project Number:	138-0-5	Figure	2
Drawn:	DII	File:	13805_4		
Checked:	SV	Revision:	2008	Date:	01/31/11

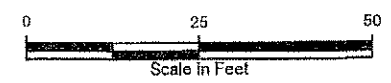


Madison St



Legend:

-  Former One-Hour Martinizing Ragle/Tomasini 712 Madison Street
-  APN# 0030-18-2110
-  Proposed Sampling Location



GENESIS ENGINEERING & REDEVELOPMENT
 351 Ruess Road · Ripon, CA 95386
 Tel: 209.599.2004 · Fax: 209.433.3990
 www.gencorp.com

PROPOSED BORING LOCATIONS

Site Investigation Plan
 Fairfield Cleaners and Laundry
 625 Jackson Street, Fairfield, California

Designed:	SV	Project Number:	118-G-5	Figure	3
Drawn:	DH	File:	128G5_5		
Checked:	SV	Revision:	00000	Date:	01/11/11

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SOLANO

---oOo---

MICHAEL McINNIS and ROBERT)	
DITTMER,)	
)	
Plaintiffs,)	
)	Case No.
vs.)	FCS033636
)	
JEWEL HIRSCH, individually and)	
doing business as FAIRFIELD)	
CLEANERS; RONALD W. WASLOHN; TERRY)	
A. DUREE, INC., a corporation;)	
STEPHEN C. SPENCER; RICHARD RAGLE;)	
GEORGE J. TOMASINI, JR., in his)	
own right and as trustee of the)	
George J. Tomasini Trust; MARY)	
ALICE BEDINGFIELD in her own right)	
and as trustee of the Mary Alice)	
Bedingfield Revocable Trust;)	
ATTIEH ASSAD; and MUNIRA ASSAD,)	
)	
Defendants.)	
)	
)	
AND RELATED CROSS-CLAIMS.)	
)	

---oOo---

DEPOSITION OF GERALD DUENSING

Friday, June 10, 2011

Taken at the location of:
HOLIDAY INN EXPRESS
9175 West Stockton Boulevard
Elk Grove, California 95758

---oOo---

Reported by Antonia Severson, CSR #3430

2

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2

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4

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12 ---oOo---

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3

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42

43 Other Persons Present:

44 GERALD DUENSING, Deponent

5

1 EXHIBITS

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11

12 ---oOo---

6

1 BE IT REMEMBERED, that pursuant to notice, and
 2 on Friday, June 10, 2011, commencing at the hour of
 3 10:05 a.m., at the location of HOLIDAY INN EXPRESS, 9175
 4 West Stockton Boulevard, Elk Grove, California, before
 5 me, ANTONIA SEVERSON, a Shorthand Reporter in and for
 6 the State of California, there personally appeared:
 7 GERALD DUENSING,
 8 Called as a witness herein, having been duly sworn to
 9 tell the truth, the whole truth, and nothing but the
 10 truth, testified as follows:
 11 ---oOo---
 12 EXAMINATION
 13 BY MR. GRAHAM:
 14 Q. Mr. Duensing, good morning. My name is Doyle
 15 Graham. I represent Robert Dittmer in this litigation.
 16 MR. GRAHAM: Before we get started, I'd like to
 17 get appearances of counsel and the parties that they
 18 represent.
 19 MS. McADAM: Good morning, I'm Allison McAdam
 20 from Hunsucker, Goodstein & Nelson, and I represent
 21 Jewel Hirsch.
 22 MR. PRICE: Good morning, Mr. Duensing. My
 23 name is Jeremy Price. I'm from the law firm of Hunt &
 24 Jeppson, and I represent Obie Goins, Lucilla Hazard, Ray
 25 Johnson and Judy Lawing.

7

1 MR. SHAMIYEH: Nick Shamiyeh. I represent Mr.
 2 and Mrs. Assad, A-s-s-a-d.
 3 MR. DUENSING: Just if I might say one thing.
 4 I do wear hearing aids, and I seem to have just a little
 5 bit of a problem picking up. So if and when you ask a
 6 question, if you could just raise the volume just a tad.
 7 Okay?
 8 MR. SHAMIYEH: Would it be easier when we ask
 9 you questions to be in front of you directly?
 10 THE WITNESS: Well, I -- say that again,
 11 please?
 12 MR. SHAMIYEH: To be in front of you directly,
 13 it would be easier for you to hear that way or --
 14 THE WITNESS: Oh, no, it isn't -- no, no,
 15 that's not -- if you'll just speak up a little bit.
 16 MR. SHAMIYEH: Okay.
 17 BY MR. GRAHAM:
 18 Q. Sure. And if at any time, Mr. Duensing, you
 19 can't hear me, just ask me to speak up and I will.
 20 First of all, Mr. Duensing, have you ever had
 21 your deposition taken before?
 22 A. No.
 23 Q. Okay. Since this is the first time, I'll go
 24 over a couple of the ground rules with you. I get to
 25 ask the questions today. You get to provide the

8

1 answers.
 2 If at any time you don't understand a question
 3 that I'm asking you, please ask me to rephrase it or
 4 explain the term that you don't understand so that we
 5 both know that you understood the question as phrased.
 6 MR. GRAHAM: We can have -- we had one more
 7 counsel come in at this time, if you'd like to make your
 8 appearances for the record and the party that you
 9 represent.
 10 MR. FARRELL: Good morning, Mr. Duensing.
 11 Robert Farrell representing the Ragle and Tomasini
 12 defendants.
 13 BY MR. GRAHAM:
 14 Q. Okay. Mr. Duensing, again, if you don't
 15 understand the question, please ask me to rephrase it,
 16 or if I use a term that you don't understand, please ask
 17 me to explain it. If you don't do that, we'll presume
 18 that you understood the question as posed.
 19 Is that fair?
 20 A. Sure.
 21 Q. Okay. We have a court reporter sitting here.
 22 You've been placed under oath. You understand that even
 23 though we're in an informal setting, that that oath has
 24 the same force and effect as if we were in a court of
 25 law.

9

1 A. Oh, yes, I understand.
 2 Q. Okay. And you're doing real good giving verbal
 3 answers. What I mean by verbal answers, a "yes" and a
 4 "no." Please try to refrain from shaking your head or
 5 "uh-huhs" or "huh-uhs."
 6 A. Right.
 7 Q. And if I stop you and ask you is that a "yes"
 8 or "no," please don't think that I'm trying to be rude.
 9 I just need a clear record.
 10 A. I understand.
 11 Q. There are other attorneys present at the
 12 deposition. They'll have a right to object to any of
 13 the questions that I pose.
 14 Please don't let that affect your answer.
 15 They're merely making their objections for the record,
 16 and it shouldn't distract you from answering the
 17 question at all.
 18 A. I understand.
 19 Q. Is there any reason, Mr. Duensing, you cannot
 20 give your best testimony today?
 21 A. I am here to cooperate and answer to the best
 22 of my knowledge. Hopefully everyone understands that
 23 some of these events probably took place 25 or 30 years
 24 ago.
 25 So to the best of my knowledge, I will answer

10

1 these questions.

2 Q. Sure. And what I meant is, are you -- have you

3 taken any drugs or alcohol within the past 24 hours that

4 would affect your ability to give truthful testimony

5 today?

6 A. No.

7 Q. Okay. With respect to the way the deposition

8 will be run today, like I say, I'll ask the questions.

9 Please wait until I'm done with the question before you

10 provide an answer.

11 And then by the same token I'll wait until

12 you're through with your answer before I pose another

13 question.

14 If we talk over each other, we'll drive this

15 lady insane.

16 A. Okay.

17 Q. With respect to your concern regarding the

18 events that happened years and years ago, we don't want

19 you to guess at anything at your deposition here today.

20 So if you don't know an answer, it's no sin to say, "I

21 don't know."

22 But I am entitled to an estimate. Do you

23 understand in your mind kind of the difference between

24 an estimate and a guess?

25 A. Maybe not.

11

1 Q. Okay.

2 A. I mean, in my opinion, an estimate is pretty

3 close to a guess.

4 Q. Okay.

5 A. I mean, I can only -- okay.

6 Q. Sure. Let me give you a common example that's

7 typically used.

8 If I were to ask you how long the table is in

9 front of you, without pulling out a ruler or a

10 measurement tape, you wouldn't be able to tell me

11 precisely how long that table is.

12 But you could give me an estimate as to the

13 length of that table, correct?

14 A. Yes, I could, but I'd be guessing.

15 Q. Okay. But you can see the table in front of

16 you, and you can use your wits about you to come up with

17 an --

18 A. Yes.

19 Q. -- educated estimate as to how long that table

20 is, correct?

21 A. If you asked me out in the hallway how long was

22 that table, I could only guess.

23 Q. Okay. But if I asked you how long the table

24 was in my office back in Lodi, that would be a total

25 guess because you wouldn't know what table I'm talking

12

1 about.

2 A. Correct.

3 Q. Okay. Mr. Duensing, let's start -- where did

4 you go to high school, sir?

5 A. Hogan High School in Vallejo.

6 Q. And did you graduate?

7 A. Yes.

8 Q. And approximately what year?

9 A. 1965.

10 Q. Is that a guess or an estimate?

11 A. That's a fact.

12 Q. Did you continue your education after high

13 school?

14 A. I did two years at Vallejo Junior College,

15 which was renamed in the interim to Solano Junior

16 College.

17 Q. And did you graduate from that college?

18 A. No.

19 Q. And did you take any specialized classes at

20 that college?

21 A. I basically took business classes.

22 Q. Anything else?

23 A. Sports.

24 Q. And approximately what year did you leave

25 Vallejo Junior College?

13

1 A. That would have been early '67. I joined the

2 Navy.

3 Q. And what year were you discharged from the

4 Navy?

5 A. What year what was I what?

6 Q. Discharged from the Navy?

7 A. 1969.

8 Q. And then after the Navy did you become

9 employed?

10 A. I worked for Sears in Vallejo.

11 Q. And approximately what year was this?

12 A. 1970. 1970 through about 1974.

13 Q. And what was your job title at Sears?

14 A. I worked my way up from sales associate to a

15 division manager.

16 Q. Within those four years?

17 A. Yes.

18 Q. And what were your responsibilities as a

19 division manager?

20 A. Promoting sales, managing people, payroll.

21 Q. Okay. And then in approximately 1974 you left

22 your position at Sears?

23 A. Yes.

24 Q. Okay. And what did you do after your position

25 at Sears?

14

1 A. I went to work for Home Linen Supply in
 2 Vallejo.
 3 Q. And this would have been in approximately what
 4 year?
 5 A. Seventy -- '74, '75.
 6 Q. Let me ask you, between your job at Sears and
 7 your job at Home Linen Supply, did you have any other
 8 employment in between --
 9 A. No, back to back.
 10 Q. And when you were hired at Home Linen Supply in
 11 Vallejo, what was your job title?
 12 A. I was a route driver.
 13 Q. What were your responsibilities as a route
 14 driver?
 15 A. Delivering and picking up linen, uniforms.
 16 Q. When you say "linen," what do you mean?
 17 A. Towels.
 18 Q. Okay. Bed sheets?
 19 A. No, no, I didn't have -- it was industrial,
 20 shop towels, so --
 21 Q. At Home Linen Supply, I -- well, let me ask
 22 you, what type of business was Home Linen Supply?
 23 A. What type of a business?
 24 Q. Yes, sir.
 25 A. Picking up and dropping off of linen, uniforms,

15

1 for processing and return to a customer.
 2 Q. You said for processing. Did -- what do you
 3 mean by "processing"?
 4 A. Washing, drying, pressing as needed.
 5 Q. Now, were these -- strike that.
 6 The washing, the drying and the pressing as
 7 needed, was that performed by Home Linen Supply, or was
 8 that performed by another company?
 9 A. Home Linen Supply. It was an operating plant.
 10 Q. And where did they operate? Oh, I'm sorry, you
 11 said Vallejo.
 12 A. Yes.
 13 Q. Did Home Linen Supply offer -- also provide dry
 14 cleaning services?
 15 A. No.
 16 Q. Waterproofing services?
 17 A. No.
 18 Q. Suede or leather cleaning services?
 19 A. No.
 20 Q. Do you know if Home Linen Supply in conducting
 21 their business of washing and drying linens, whether
 22 they used any dry cleaning solvent?
 23 A. I will guess. I was never involved in the
 24 production end of that business. I was -- I was a route
 25 driver. I picked up and delivered my loads. My daily

16

1 loads were supplied to me. I loaded my truck.
 2 Q. Okay. And when I say "dry cleaning solvent,"
 3 do you know to what I'm referring?
 4 A. The only dry cleaning solvent that I am
 5 familiar with is perchloroethylene.
 6 Q. And for purposes of this deposition, if we
 7 could just refer to it as PERC, is that fine with you?
 8 A. PERC, that's fine.
 9 Q. Okay.
 10 A. That's what I always called it.
 11 Q. Okay. Now, you began as a route driver for
 12 Home Linen Supply in 1974.
 13 What year did you leave Home Linen Supply?
 14 A. That would have been late -- late '76, early
 15 '77. Excuse me. Let me -- let me back up on that.
 16 Q. Sure.
 17 A. That would have been late '78, early '79.
 18 Q. And during your time as a route driver for Home
 19 Linen Supply, did your job title ever change?
 20 A. No.
 21 Q. So you were a route driver for the entire time
 22 that you were with Home Linen Supply?
 23 A. Correct.
 24 Q. And then after you left Home Linen Supply,
 25 where were you employed next?

17

1 A. I was the proud owner of One-Hour Cleaners in
 2 Fairfield.
 3 Q. That was located at 712 Madison Street?
 4 A. That's correct.
 5 Q. And what year did you purchase the business of
 6 One-Hour Cleaners?
 7 A. 1979. I don't know the exact date.
 8 Q. Was it solely you who purchased One-Hour
 9 Cleaners, or did any other person purchase One-Hour
 10 Cleaners with you?
 11 A. My wife and myself. It was in both of our
 12 names.
 13 Q. And your wife is Sandra Duensing?
 14 A. Correct.
 15 Q. Mr. Duensing, have you ever attended any trade
 16 schools?
 17 A. Yes.
 18 Q. What trade schools?
 19 A. Dry cleaning. At that time, Doyle -- I guess
 20 it's okay to call you Doyle?
 21 Q. That's fine.
 22 A. At that time you had to have a dry cleaning
 23 license to own a dry cleaning business. Later on that
 24 changed.
 25 Q. And this was in approximately 1979 when you

18

1 purchased One-Hour Cleaners?
 2 A. Correct.
 3 Q. You say a "dry cleaning license." Who issued
 4 this license?
 5 A. Laney --
 6 Q. I guess to be clear, was this issued through
 7 the State of California?
 8 A. Doyle, I don't remember.
 9 Q. Okay.
 10 A. I went to a six-week school at Laney College in
 11 Oakland, and I'm not sure who -- if it was the state
 12 that issued the license or if it was the college that
 13 issued a, you know, completion.
 14 Q. This is Laney College you said?
 15 A. Laney, L-a-n-e-y.
 16 Q. And this was a six-week course?
 17 A. Correct.
 18 Q. And after completion of that course, you were
 19 issued a license?
 20 A. I was -- pardon?
 21 Q. Issued a license?
 22 A. Yes.
 23 Q. Okay. And this license was to operate dry
 24 cleaning equipment?
 25 A. Right.

19

1 Q. Okay. How long was this license good for; do
 2 you know?
 3 A. Indefinitely.
 4 Q. Okay. You didn't have to take any refresher
 5 courses?
 6 A. No. No.
 7 Q. What did you learn in your six-week school at
 8 Laney College?
 9 MR. FARRELL: Objection, vague, ambiguous,
 10 overbroad.
 11 THE WITNESS: I'm sorry. You came in, Bob,
 12 after the fact. I've got hearing aids.
 13 MR. FARRELL: I'm sorry. I'm just stating an
 14 objection for the record. You're free to respond. It's
 15 simply for the record.
 16 THE WITNESS: I learned fabrics, how to spot
 17 different chemicals that were used for different stains.
 18 That was pretty much the basis of it because it
 19 was -- at that time it was obvious to me that if you
 20 didn't know what chemicals to use for what stains on
 21 certain fabrics, you could ruin it.
 22 BY MR. GRAHAM:
 23 Q. In your six-week school at Laney College, were
 24 you instructed as to the operations of PERC dry cleaning
 25 equipment?

20

1 A. No.
 2 Q. In your schooling at Laney College, were you
 3 instructed into -- strike that.
 4 In your six-week school at Laney College, were
 5 you provided any instruction with respect to storage of
 6 PERC?
 7 A. No.
 8 Q. Handling of PERC?
 9 A. No.
 10 Q. So as far as you recall as you sit here today,
 11 your six-week schooling at Laney College, you learned
 12 about fabrics and spotting and the different print
 13 spotting chemicals?
 14 Is that a "yes"?
 15 A. Correct.
 16 Q. Okay. Anything else you can think of as you
 17 sit here today?
 18 A. Not -- no, I can't remember anything else
 19 that --
 20 Q. You don't still have a copy of that license
 21 that you were issued, do you?
 22 A. No.
 23 Q. Okay.
 24 A. And for the record, I had a medium-sized box --
 25 after 25 years, I had a medium-sized box of what I had

21

1 left from the business, which included canceled check
 2 stubs.
 3 And I have presented to two different counsels,
 4 I believe, what was relevant to this case as far as
 5 license -- I mean, I had a Fairfield Fire Department
 6 receipt for storage of PERC at my location.
 7 I think, Bob, you have -- you have some of
 8 those copies that I gave to you, don't you?
 9 Aren't you Robert Farrell?
 10 MR. FARRELL: Yes, I am.
 11 THE WITNESS: In our meeting, didn't I -- I
 12 turned over four or five pieces of --
 13 MR. FARRELL: Yeah, that's correct. I have
 14 copies of those.
 15 THE WITNESS: And, Doyle, you have those also,
 16 correct?
 17 MR. GRAHAM: Yes, sir.
 18 THE WITNESS: Okay. That -- and I've gone back
 19 through my -- my box, and I have nothing else that is
 20 relevant.
 21 BY MR. GRAHAM:
 22 Q. Other than your six-week school at Laney
 23 College, did you -- have you ever received any
 24 specialized training with respect to dry cleaning
 25 operations?

22

1 A. No. Personal experience, Doyle.
 2 Q. Okay. Did you ever take any classes that were
 3 provided by One-Hour Martinizing?
 4 A. No.
 5 Q. What about any classes or instructions that
 6 were provided by the Cal/EPA Air Resources Board?
 7 A. No.
 8 Q. Have you ever been a member of any dry cleaning
 9 organization?
 10 A. No.
 11 Q. Any trade association?
 12 A. No.
 13 Q. All right. So you indicated in 1979 that you
 14 and your wife purchased One-Hour Cleaners in Fairfield
 15 at 712 Madison; is that correct?
 16 A. Yes.
 17 Q. Okay. And from whom did you purchase the
 18 businesses?
 19 A. Tom Turigliatto.
 20 Q. Could you spell Tom's last name for me?
 21 A. T-u-r-i-g-l-i-a-t-t-o. Mr. Turigliatto is my
 22 father-in-law.
 23 Q. When did you marry Sandra Duensing?
 24 A. That would have been February 7th, 35 years
 25 ago. '76.

23

1 Q. I had '75, but right around '75, '76?
 2 A. Yeah, it was probably February of '76. My
 3 daughter was born on June of '77.
 4 Q. Prior to you and Mrs. Duensing purchasing the
 5 One-Hour Cleaners from Mr. Turigliatto, had
 6 Mrs. Duensing ever worked at that plant?
 7 A. Yes.
 8 Q. Do you know when she first started working
 9 there?
 10 A. She tells me from 15, 16 years old. She worked
 11 on Saturdays for her father.
 12 Q. And do you know what she did for her father at
 13 One-Hour Cleaners?
 14 A. She worked the counter.
 15 Q. Worked the counter. Exclusively?
 16 A. Pardon me?
 17 Q. Did she have any other job responsibilities
 18 other than working the counter during the time that
 19 Mr. Turigliatto owned the dry cleaners?
 20 A. Pressing.
 21 Q. Pressing.
 22 A. And that's during our tenure of owning that
 23 business, that's all she did.
 24 Q. Okay. And I just want to be real clear. Right
 25 now I'm talking about the time prior to the time that

24

1 you purchased 712 Madison from Mr. Turigliatto -- or
 2 strike that.
 3 Right now I'm talking about the time prior to
 4 the time that you purchased the business, the One-Hour
 5 Cleaners business, from Mr. Turigliatto.
 6 So prior to the time that you purchased that
 7 business, I'm trying to figure out what her job
 8 responsibilities or what she did to help out her father
 9 in the operation of One-Hour Cleaners.
 10 A. Pressing and waiting on the counter.
 11 Q. Okay. Do you know if she ever ran any of the
 12 dry cleaning equipment during the time that
 13 Mr. Turigliatto operated One-Hour Cleaners?
 14 A. Not to my knowledge.
 15 Q. Prior to the time that you purchased -- strike
 16 that.
 17 Prior to the time that you and your wife
 18 purchased One-Hour Cleaners from Mr. Turigliatto, had
 19 you ever assisted Mr. Turigliatto in any of the
 20 operations during the time that he owned the business?
 21 A. No.
 22 Q. When you purchased the business from
 23 Mr. Turigliatto in approximately 1979, what equipment
 24 did you purchase from Mr. Turigliatto?
 25 And when I say "what equipment," I'm

25

1 specifically referring to either PERC dry cleaning
 2 machines or any other equipment that would be associated
 3 with those PERC dry cleaning machines.
 4 A. Do you want me to itemize each piece? Or --
 5 Q. Well, if -- let's start this way. When you
 6 purchased the business from Mr. Turigliatto, you bought
 7 some dry cleaning equipment, correct?
 8 A. In whole. I bought the business, equipment,
 9 goodwill.
 10 Q. Okay. So let's talk about the equipment that
 11 you purchased. At the time that you purchased the
 12 business from Mr. Turigliatto, was it a -- the dry
 13 cleaning machine that you purchased, was that a transfer
 14 machine?
 15 A. Yes.
 16 Q. Okay.
 17 A. And, Doyle, I think, like I spoke to you at one
 18 time, the business was called One-Hour Martinizing, and
 19 the name Martinizing came about because of a system, not
 20 anything else. It was Martin equipment that was in the
 21 business.
 22 So if you dry cleaned a garment in that dry
 23 cleaners, it was called Martinizing.
 24 Q. But Mr. Turigliatto, he did not run the
 25 operation as One-Hour Martinizing, did he?

26

1 A. He did.
 2 Q. Okay.
 3 A. Yes, he did.
 4 Q. For a period of time?
 5 A. 20 years.
 6 Q. Okay.
 7 A. That's an estimate.
 8 Q. But when you purchased the business, it was --
 9 strike that.
 10 When you purchased the business, was it called
 11 One-Hour Martinizing, or was it called One-Hour
 12 Cleaners?
 13 A. It was -- it was called One-Hour Cleaners.
 14 Q. Okay. So as I understand it, a transfer
 15 machine essentially has the machine that you put the
 16 clothes into, and then you put the clothes into a
 17 separate reclaimer, a dryer, so to speak, correct?
 18 A. Correct.
 19 Q. Okay. So can we talk about it as a washer and
 20 the reclaimer? Will you know what I'm speaking of when
 21 I talk like that?
 22 A. A washer and a reclaimer?
 23 Q. Is there a separate -- is there a different
 24 word for the first piece of equipment that you put the
 25 clothes in?

27

1 A. Dry cleaning machine.
 2 Q. Okay. So that dry cleaning machine, that was a
 3 Martin?
 4 A. Correct.
 5 Q. That you purchased from Mr. Turigliatto?
 6 A. Correct.
 7 Q. It was a 30-pound; do you know?
 8 A. I think it was only 25.
 9 Q. 25. And then you also purchased the reclaimer
 10 with that?
 11 A. Correct.
 12 Q. Okay. And that was also a Martin reclaimer?
 13 A. I don't think that it was called a Martin
 14 reclaimer. At some point I believe that reclaimer was
 15 changed out, prior to my ownership, because it was not a
 16 Martin -- Martin machine. And what the name of it was
 17 or the brand, I do not know.
 18 Q. Okay. Do you know the capacity of that
 19 reclaimer?
 20 A. I want to say 50 pounds.
 21 Q. Okay. So we've talked about the dry cleaning
 22 unit and the reclaimer that you purchased from
 23 Mr. Turigliatto.
 24 Did you also purchase a still?
 25 MR. SHAMIYEH: What's that?

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1 MR. GRAHAM: A still.
 2 THE WITNESS: The dry cleaning machine had a
 3 built-in still.
 4 BY MR. GRAHAM:
 5 Q. When you say "the dry cleaning machine," we're
 6 talking about the dry cleaning machine as opposed to the
 7 reclaimer, correct?
 8 A. Correct.
 9 Q. Okay. So the still --
 10 A. Martin --
 11 Q. I'm sorry?
 12 A. The Martin dry cleaning machine has a built-in
 13 still, or had a built-in still.
 14 Q. Any other piece of equipment that you purchased
 15 from Mr. Turigliatto that would be related specifically
 16 to PERC dry cleaning operations?
 17 A. No.
 18 Q. Okay. No muck cooker?
 19 A. No.
 20 Q. Did you purchase a muck cooker from
 21 Mr. Turigliatto?
 22 A. No.
 23 Q. Okay. Do you recall how many spotting
 24 tables -- well, strike that.
 25 In your purchase of One-Hour Cleaners from

29

1 Mr. Turigliatto, did you also purchase spotting tables?
 2 A. Yes.
 3 Q. Okay. Do you recall how many you purchased?
 4 A. One.
 5 Q. One. Now, on this Martin 25-pound dry cleaning
 6 unit that you purchased from Mr. Turigliatto, did this
 7 unit have filters on it?
 8 A. Yes. I'm trying to recall -- I'm answering
 9 your question. Yes, it had filters.
 10 Q. Okay. At the time that you purchased One-Hour
 11 Cleaners from Mr. Turigliatto, did Mr. Turigliatto
 12 provide you any training with respect to any of the --
 13 the -- either the Martin 25-pound dry cleaning machine
 14 or the reclaimer, or any of the filters? Anything.
 15 A. He remained -- excuse me. He remained on the
 16 premises for approximately 30 days after the purchase to
 17 make sure that I understood operating and spotting and
 18 so forth.
 19 Q. Did Mr. Turigliatto ever provide to you any
 20 instructions with respect to changing of the filters on
 21 the Martin 25-pound machine?
 22 A. Yes.
 23 Q. Okay. What did he tell you?
 24 A. The process was, you could tell when the
 25 filters needed to be changed because the pressure --

30

1 there were pressure gauges that showed flow of PERC
 2 through the machine.
 3 When that pressure started to rise, it
 4 indicated that there was a restriction or a buildup on
 5 the filters.
 6 When it got to a certain point, you know you
 7 needed to change the filters. They were drained
 8 overnight.
 9 Q. And this is --
 10 A. And by drained -- pardon me. And by drained,
 11 there were -- there was a piping system that you could
 12 open a petcock, and it would drain back down into the
 13 machine overnight.
 14 Q. Did Mr. Turigliatto provide you any information
 15 with respect to washing of those filters?
 16 A. No.
 17 Q. Did Mr. Turigliatto provide you any information
 18 with respect to his practices with respect to disposal
 19 of the filters?
 20 A. Just that they were put into the garbage.
 21 Q. Okay.
 22 A. After having drained all night, they were dry.
 23 Perchloroethylene, or PERC, evaporates rapidly.
 24 So with the air surrounding these filters with
 25 the drainage and the venting and everything, you know,

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1 of this container that had the filters, they were --
 2 they were pretty dry by the time the next morning came
 3 around.
 4 Q. Did Mr. Turigliatto provide you any instruction
 5 with respect to any personal safety equipment that you
 6 should be wearing when changing those filters?
 7 A. No.
 8 Q. Okay. Did you -- when you first purchased the
 9 business, when you were changing those filters, did
 10 you -- did you wear any gloves?
 11 A. No.
 12 Q. And you say that those filters were just --
 13 were placed in the trash can when they were used up, so
 14 to speak, correct?
 15 I'm sorry; is that correct?
 16 A. Correct.
 17 Q. Okay. And you say they were placed in a
 18 garbage can. Was that garbage can inside the premises
 19 or outside the premises?
 20 A. That was outside.
 21 Q. Okay. And where was that garbage can located,
 22 I mean with respect to the back door? Was it right out
 23 the back door; was it away from the back door? My
 24 understanding is that there's a pretty big parking lot
 25 there.

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1 A. Right out the back door.
 2 Q. Right out the back.
 3 When you purchased the business from
 4 Mr. Turigliatto, did Mr. Turigliatto provide to you any
 5 equipment manuals for any of the pieces of equipment
 6 that you purchased from him?
 7 A. Yes. Doyle, he had the business for 20 years.
 8 He had owners' manuals. He had a collection of
 9 everything over 20 years. That was in a cabinet or a --
 10 what it was, was a -- not a roll top, but a desk that
 11 had a top that lifted up.
 12 Q. Okay.
 13 A. There were manuals for equipment that was
 14 there. There were manuals for equipment that no longer
 15 existed.
 16 Did I refer to those? I don't ever recall
 17 referring to an owners' manual.
 18 Q. Did Mr. Turigliatto review with you any of
 19 those manuals?
 20 A. No.
 21 Q. So just so I'm clear, the only equipment that
 22 you purchased relating to dry cleaning itself, and I'm
 23 not talking about the spotting tables or anything of
 24 that nature, is the Martin 25-pound machine and the
 25 50-pound reclaimer; is that correct?

33

1 A. From Mr. Turigliatto, yes.
 2 Q. Okay. You said after you purchased the
 3 business from Mr. Turigliatto, he remained on the
 4 premises for approximately 30 days; is that correct?
 5 A. Correct.
 6 Q. Okay. And at that time was he -- could you
 7 just give me an idea of what he was doing?
 8 A. Just watched me.
 9 Q. Okay.
 10 A. He basically was there in case I had any
 11 questions.
 12 Q. Okay.
 13 A. He didn't participate. He drank a lot of
 14 coffee. He was -- really, he was basically there in
 15 case I had any questions or if anything came up that
 16 I --
 17 Q. Okay. And do you recall in that 30 days that
 18 he was kind of supervising, for lack of a better phrase,
 19 any issues that did come up that you had to consult with
 20 him?
 21 A. No.
 22 Q. When you purchased the business from
 23 Mr. Turigliatto, did he -- do you recall any comments
 24 that he made to you with respect to any problems that he
 25 had had with any of the equipment?

34

1 A. Doyle, if there was a conversation concerning
 2 problems, I don't recall.
 3 Q. Okay.
 4 A. Just in the day-to-day conversations that we
 5 had, steam traps were brought up, just, you know --
 6 wasn't anything major.
 7 Now that I think about it, maintenance of the
 8 boiler, which doesn't have anything to do with PERC, but
 9 I mean, he -- he mentioned, yeah, if this happens,
 10 you're going to need to change that steam trap or, you
 11 know, that type of conversation.
 12 Q. But he didn't specifically point out to you,
 13 that you recall, any problems that he had encountered
 14 with some of the equipment either leaking or releasing
 15 PERC?
 16 A. No.
 17 Q. Okay. What is a steam trap?
 18 A. You've got a steam line that goes from point A
 19 to point B, point A being the boiler, point B being a
 20 piece of equipment that needs steam to operate.
 21 And a steam trap prevents the backup of
 22 condensation, of steam. It has a -- condensation,
 23 basically, because obviously as the pipe heats up and
 24 cools down, there's going to be a certain amount of
 25 condensation.

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1 And you get condensation in that steam line,
 2 for instance on a press, when you go to press something.
 3 Then the water comes out into the pads, into the
 4 garments, and so the steam trap pretty much prevented
 5 that.
 6 Q. Okay.
 7 A. If it was operating correctly.
 8 Q. Okay. When you purchased the business from
 9 Mr. Turigliatto, was it your understanding that
 10 Mr. Turigliatto was renting the property?
 11 A. Was renting the property?
 12 Q. Yes.
 13 A. Yes.
 14 Q. Do you know who he was renting the property
 15 from?
 16 A. George Tomasini and Richard Ragle.
 17 Q. Okay. And when you purchased the business from
 18 Mr. Turigliatto, did you also continue to rent the
 19 properties from Mr. Tomasini and Mr. Ragle?
 20 A. Yes.
 21 Q. Okay. During your tenancy at 712 Madison, did
 22 you ever have any written rental agreement with
 23 Mr. Ragle and Mr. Tomasini for your lease of that
 24 premises?
 25 MR. FARRELL: I'm sorry, could you read that

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1 question back?
 2 (Whereupon the reporter read back the following
 3 testimony:
 4 "Q. Okay. During your tenancy at
 5 712 Madison, did you ever have any
 6 written rental agreement with Mr. Ragle
 7 and Mr. Tomasini for your lease of that
 8 premises?")
 9 THE WITNESS: In the beginning, yes.
 10 BY MR. GRAHAM:
 11 Q. You say "in the beginning." For -- can you
 12 give me an idea of for how many years you had a written
 13 rental agreement with Mr. Tomasini and Mr. Ragle?
 14 A. As I recall, they wrote up an agreement for, I
 15 want to say five years, and after that I don't recall
 16 signing any written type of agreements at all.
 17 I mean, we -- Mr. Turigliatto had operated the
 18 business for 20 years, and -- and I think they realized
 19 that I wasn't going anywhere, so we just went month to
 20 month, basically.
 21 After that -- like I say, I -- I never signed a
 22 second agreement or lease.
 23 Q. Okay. So after this first agreement that you
 24 recall, was a five-year lease; is that correct?
 25 A. (Witness nodded head.)

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1 Q. That's a "yes"?
 2 A. Yes.
 3 Q. And then after that five-year lease it was just
 4 kind of a handshake deal for a month-to-month term?
 5 A. Yes.
 6 Q. Okay. Now, with respect to that five-year
 7 written lease to which you referred, do you know if
 8 there was any provision within that lease that required
 9 you to maintain any liability insurance?
 10 A. No, only because I never had any liability
 11 insurance. My wife and I discussed in the beginning
 12 getting insurance to cover garment loss, and we opted
 13 not to because I had the schooling, I had the knowledge
 14 not to ruin clothes.
 15 If for any reason there was a garment, silk
 16 blouse, \$80, hundred dollar silk blouse that had to be
 17 replaced, we would be able to do that as opposed to
 18 paying out premiums on insurance. So we never got
 19 insurance.
 20 And, Doyle, one more thing on the insurance
 21 question. I had to replace a front window in the
 22 property at 712 Madison, a big plate glass window, which
 23 cost me over \$900, which I didn't have insurance to
 24 cover it.
 25 Q. Okay.

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1 A. And my landlord said, "You broke it, you pay
 2 for it."
 3 Q. Okay.
 4 A. So we did.
 5 (Whereupon Exhibit No. 1 was then marked for
 6 identification.)
 7 BY MR. GRAHAM:
 8 Q. Mr. Duensing, we've handed to you what's been
 9 marked as Exhibit 1 to your deposition. I don't have
 10 many questions on this, actually.
 11 I just want to know, do you recognize this
 12 document?
 13 A. Yes, I do.
 14 Q. Okay. And you received this document, and
 15 that's what commanded your appearance here today?
 16 A. Yes.
 17 Q. Okay. If you'd do me a favor and just turn to
 18 the very last page of this document.
 19 A. (Witness complied.)
 20 Q. I just want to confirm something. In the --
 21 you see the second set of folks, Gerald Duensing, Sandra
 22 Duensing? You see that?
 23 A. Yes.
 24 Q. Okay. Line 7 and 8?
 25 A. Yes.

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1 Q. Okay. That e-mail address that's set below
 2 right after line 10, jerryd55chev@comcast.net --
 3 A. Yes.
 4 Q. -- is that your current e-mail address?
 5 A. Yes.
 6 Q. Okay. And the 5861 Lupin Lane, is that your
 7 current residence?
 8 A. Yes.
 9 Q. Do you have any plans to move from that
 10 residence, say, within the next year or so?
 11 A. No.
 12 Q. Okay. So the best way to contact you would be
 13 at either this e-mail address or this address -- this
 14 e-mail --
 15 A. Yes.
 16 Q. -- address or this physical address?
 17 A. Yes.
 18 Q. Okay.
 19 (Whereupon Exhibit No. 2 was then marked for
 20 identification.)
 21 BY MR. GRAHAM:
 22 Q. Mr. Duensing, we've handed to you what's been
 23 marked as Exhibit No. 2 to your deposition. Do you
 24 recognize this photo?
 25 A. Yes.

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1 Q. And what is depicted in this photo?
 2 A. It is the location of 712 Madison, which used
 3 to be called One-Hour Cleaners.
 4 Q. All right. Let me ask you, you see the front
 5 paving here, these stones that kind of make up in front
 6 of the -- in front of the 712 Madison store and on to
 7 the street.
 8 Was that -- this condition that's depicted in
 9 this photo with respect to that paving, was that in the
 10 same condition as when you operated the business?
 11 A. Midway. That renovation took place in 1989.
 12 Q. When you say "that renovation," what are you
 13 speaking of?
 14 A. They were doing a -- this -- this particular
 15 building is located in the -- what we affectionately
 16 called the old part of downtown Fairfield.
 17 They were doing a downtown renovation in which
 18 they took -- and honestly, other than my street, Madison
 19 Street -- my street -- other than Madison Street, I
 20 don't recall the other streets that were renovated.
 21 But they took out the whole street, down
 22 probably I want to say eight or 10 feet down, dirt. I'm
 23 sure there were sewer systems involved in that. The
 24 construction lasted approximately nine months.
 25 They left a pathway on my side -- or a walkway

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1 on my side of the street, the other side of the street,
 2 and my customers for that nine-month period of time had
 3 to travel almost two blocks to come to my location.
 4 Very nice when they got done, but --
 5 Q. Okay. Now, this renovation that we've been
 6 speaking of, do you know one way or the other whether
 7 any sewer mains were repaired or replaced in front of
 8 712 Madison?
 9 MR. FARRELL: Just to clarify, you're referring
 10 to what's shown in the photo?
 11 MR. GRAHAM: Yes, thank you.
 12 THE WITNESS: Guaranteed, Doyle, no, I don't.
 13 But I -- I just can't say for sure whether they were
 14 repaired.
 15 I can -- I can almost remember pipes coming in
 16 and going out, so I mean, it didn't make any sense to me
 17 why they would do that -- that far down if they were
 18 just going to replace the bricks. If they were going to
 19 go down 10 feet, I'm sure everything was replaced
 20 underneath.
 21 BY MR. GRAHAM:
 22 Q. During this renovation project that we're
 23 speaking of with respect to the street in front of
 24 712 Madison, do you recall any conversations that you
 25 had with anyone with the City of Fairfield with respect

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1 to this renovation project?

2 A. Specific conversations, no, but I'm sure there

3 were conversations with the workers.

4 Q. Okay.

5 A. On a day-in, day-out basis. I mean --

6 Q. As you sit here today, do you recall any of the

7 conversations, the sum and substance of any of the

8 conversations that you would have had with any of the

9 City of Fairfield employees?

10 A. No, no.

11 Q. As we're looking at the photo that's been

12 marked as Exhibit No. 2, the building to the right --

13 well, strike that.

14 712 Madison, that's the building in the middle,

15 correct?

16 A. In the center, correct.

17 Q. Okay. Now, if we're looking at this picture,

18 it's been marked as Exhibit No. 2, the building to the

19 right that has the "For Lease" sign on it, do you see

20 that?

21 A. Yes.

22 Q. During -- strike that.

23 When you first purchased the business from

24 Mr. Turigliatto, what type of business was located where

25 we've identified as the building next -- to the right

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1 with the "For Lease" sign?

2 A. When I purchased the business, I honestly don't

3 remember what was in there.

4 That particular piece of property, there were

5 tenants in and out quite a bit. I can recall a

6 typewriter repair.

7 I can recall a travel agency. In fact, I think

8 the travel agency was the last one that I can recall

9 being in there.

10 Q. And just to stop you so we're clear, we're

11 speaking of only the building to the right that has the

12 "For Lease" sign?

13 A. Correct.

14 Q. Okay. I just wanted to make sure we're clear.

15 A. Yeah.

16 Q. So typewriter repair, a travel agency. Any

17 other businesses you recall?

18 A. Not that I can remember.

19 Q. Okay. What about -- referring back to Exhibit

20 No. 2, if we look to the left of the building --

21 A. Oh, Doyle, excuse me.

22 Q. Yeah, absolutely.

23 A. I think there was a photo studio in that

24 building when I bought the property.

25 Q. And this happens many times in depositions,

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1 Mr. Duensing. If at some later point the light flashes

2 in your head and you recall an answer to a question that

3 you didn't recall earlier, please feel free to give me

4 that information.

5 A. Great.

6 Q. Okay.

7 A. Because I'm sure after I leave here today,

8 things are going to --

9 Q. Let's -- let me direct your attention back to

10 Exhibit No. 2. And if we look to the building that is

11 to the left of what we've identified as 712 Madison, can

12 you give me a rundown of the types of businesses that

13 you recall being there during the time that you operated

14 there?

15 A. The only tenant that I ever recall being in

16 that piece of property was Beneficial Finance.

17 Q. Mr. Duensing, one thing I probably should have

18 told you at the beginning. I'm going to try to get you

19 out of here as early as I can. I presume we'll be

20 taking a lunch, probably about noon or 12:30. It's

21 going to be kind of your call and her call.

22 I usually take a break about every hour and a

23 half. If you need to take a break for any reason

24 whatsoever, at any point, just let me know. Everyone

25 will go off the record, and you can take care of what

45

1 you need to take care of.

2 A. Fine.

3 Q. Okay.

4 (Whereupon Exhibit No. 3 was then marked for

5 identification.)

6 BY MR. GRAHAM:

7 Q. Mr. Duensing, we've handed to you what's been

8 marked as Exhibit 3 to your deposition. Do you

9 recognize this photo?

10 A. Yes.

11 Q. Okay. And could you describe for me what's

12 depicted in this photo?

13 A. That is the back of the building that is shown

14 in Exhibit 2.

15 Q. All right. And the back of 712 Madison --

16 strike that.

17 Is the door, the brown door right in the middle

18 of the picture of Exhibit No. 3 where the orange bucket

19 is, do you see that?

20 A. Yes.

21 Q. Okay. Is that the back door to the 712 Madison

22 property?

23 A. Yes, it is.

24 Q. Okay. Now, at the time that you purchased the

25 property from Mr. Turigliatto -- well, strike that.

46

1 Do you see the pavement on the parking lot as
 2 depicted in Exhibit No. 3, Mr. Duensing?
 3 A. The pavement?
 4 Q. Yes.
 5 A. Yes.
 6 Q. Okay. During the time that you purchased the
 7 business from Mr. Turigliatto, was the area that's paved
 8 in Exhibit 3, was that also paved?
 9 A. Yes.
 10 Q. Okay. If you look above the door, the brown
 11 door that we've referred to as the back door of
 12 712 Madison, and you look up to the right-hand corner of
 13 that door, do you see that gray spot?
 14 A. Yes.
 15 Q. Do you know what that is?
 16 MR. FARRELL: Objection, calls for speculation.
 17 BY MR. GRAHAM:
 18 Q. If you know. Please don't guess, Mr. Duensing.
 19 A. I believe, I think, as best I can remember,
 20 that was a vent from the steam line.
 21 Q. And what do you mean a vent for a steam line?
 22 A. If I'm not mistaken -- oh, boy, it's been so
 23 long ago.
 24 Okay. The boiler, our boiler, sat right
 25 underneath that window with the grate.

47

1 Q. Now, when you say "that window with the grate,"
 2 are we looking at the window to the right of the brown
 3 door?
 4 A. To the left.
 5 Q. To the left. Above the blue painted area?
 6 A. Correct.
 7 Q. Okay.
 8 A. That's where the boiler sat. There was a --
 9 you know, I don't want to mislead or misconstrue. I --
 10 honestly, I don't remember. There was -- there was
 11 definitely a pipe that came out of that -- out of that
 12 hole, as best I can remember.
 13 Q. And when you --
 14 A. But I don't recall if it came from the pressing
 15 side or from the boiler side.
 16 Let me -- down that wall, towards the front of
 17 that building where that hole is, was where all the
 18 presses -- all -- both presses and another piece of
 19 equipment used to press garments. That's where those
 20 were lined up. And then your boiler sat underneath that
 21 window where the blue paint is.
 22 Honestly, Doyle, I don't remember, but there
 23 was a pipe that came out of there. And obviously, it's
 24 a good-sized pipe.
 25 Q. Okay.

48

1 A. I don't remember.
 2 Q. Again, Mr. Duensing, if it dawns on you later
 3 on in your deposition, please just feel free to let me
 4 know.
 5 A. Okay.
 6 (Whereupon Exhibit No. 4 was then marked for
 7 identification.)
 8 BY MR. GRAHAM:
 9 Q. Okay. Mr. Duensing, we've handed to you what's
 10 been marked as Exhibit No. 4. I presume you recognize
 11 this one?
 12 A. Yes.
 13 Q. Okay. We see this is kind of a step back from
 14 Exhibit 3 and shows us a larger area of the parking lot.
 15 Would you agree?
 16 A. Yes.
 17 Q. Okay. When you purchased the business from
 18 Mr. Turigliatto, did the parking lot look similar to the
 19 way it's depicted here in Exhibit No. 4?
 20 A. Yes.
 21 Q. Okay. And by that, I mean, the area that we
 22 see paved in Exhibit No. 4, that area was also paved at
 23 the time that you purchased the business from
 24 Mr. Turigliatto?
 25 A. Yes.

49

1 Q. Do you know when that parking lot was first
 2 paved?
 3 A. It was always paved, from 1979 -- my first --
 4 my first purchase of the business, that parking lot was
 5 paved.
 6 Q. Let me ask you, as we're looking at Exhibit
 7 No. 4 -- strike that.
 8 Mr. Duensing, you said that that parking lot
 9 was always paved. How much of it was paved? Were there
 10 any bare areas, any dirt areas that you recall?
 11 MR. FARRELL: Objection, vague, ambiguous as to
 12 the area being referred to. You're referring to only
 13 the area being depicted in the paragraph?
 14 BY MR. GRAHAM:
 15 Q. Well, I'm asking you, Mr. Duensing, when you
 16 said that parking lot was always paved, what did you
 17 mean by that?
 18 A. It was always blacktop.
 19 Q. Okay. You're referring to the area that we're
 20 looking at in Exhibit No. 4?
 21 A. Correct.
 22 Q. Okay. During the time that you operated
 23 One-Hour Cleaners, did you ever seal that back parking
 24 lot, put any sealant on it?
 25 A. Did I?

50

1 Q. Yes.

2 A. No.

3 Q. Did you ever employ anyone to do that?

4 A. No.

5 Q. From your understanding of the lease, would

6 that have been your responsibility or would that have

7 been the responsibility of the landlord?

8 A. That would have been the responsibility of the

9 landlord.

10 MR. FARRELL: I'll object as calling --

11 belatedly, as calling for a legal conclusion. The

12 document speaks for itself.

13 BY MR. GRAHAM:

14 Q. You don't happen to have -- I think I may have

15 asked you this, but I just want to make sure. You don't

16 happen to have a copy of that initial lease that you

17 executed with Ragle and Tomasini, do you?

18 A. No, I don't. I looked.

19 Q. Okay. Do you recall during the time that you

20 operated One-Hour Cleaners -- well, strike that.

21 You operated One-Hour Cleaners from

22 approximately 1979 until what time, sir?

23 A. 1995.

24 Q. Okay. Now, during the time that you operated

25 One-Hour Cleaners from 1979 to 1995, do you recall ever

51

1 seeing anyone in that back parking lot applying any

2 sealant?

3 A. Yes.

4 Q. Okay. Approximately what year?

5 A. I -- I couldn't tell you, Doyle. It was -- to

6 the best of my knowledge, it was sealed at least once in

7 those -- in that period of time.

8 Q. And during the period of time that you operated

9 One-Hour Cleaners from 1979 to 1995, do you recall -- do

10 you recall that the parking lot was extended in any

11 manner?

12 A. I vaguely remember looking at Exhibit 4, off to

13 the left, which we can't -- which is not depicted in

14 that photo.

15 I believe the parking lot was extended off to

16 the left. There was another set of buildings that ran

17 perpendicular to that building right there that we see

18 in the photograph.

19 On the left-hand side there was another set of

20 buildings, and I want to say that parking lot was

21 extended at some point in time while I was running

22 One-Hour Cleaners. The left-hand side was dealt with.

23 I don't recall because it didn't deal with me.

24 I mean, I wasn't affected by it.

25 Q. When you went to work, Mr. Duensing, did you

52

1 park in the back or the front?

2 A. Back.

3 Q. Routinely?

4 A. I'm sorry?

5 Q. Routinely?

6 A. Always.

7 Q. Always.

8 During the time that you operated One-Hour

9 Cleaners from approximately 1979 to 1995, do you recall

10 any improvements that were done to the 712 Madison

11 building?

12 MR. FARRELL: Vague as to "improvements."

13 THE WITNESS: I'm sorry, Bob, what did you say?

14 MR. FARRELL: Just an objection as to the

15 question is vague as to the term "improvements," but

16 you're free to respond.

17 BY MR. GRAHAM:

18 Q. Again, Mr. Duensing, don't let them distract

19 you. They're merely making their objections for the

20 record.

21 A. No.

22 Q. Any improvements whatsoever? That you recall.

23 A. Not that I recall.

24 Q. Okay. Do you recall any improvements that were

25 made to the 712 Madison building during the time that

53

1 Mr. Turigliatto operated?

2 A. No, I'm --

3 MR. FARRELL: Objection, calls for speculation.

4 THE WITNESS: -- not aware of any improvements

5 that might have been done then. Would you consider

6 painting an improvement?

7 BY MR. GRAHAM:

8 Q. No.

9 A. Okay. The building was routinely painted

10 but --

11 Q. I guess that would depend on what color it was

12 painted as to whether that was an improvement or not.

13 But, no, I wouldn't consider painting -- I'm talking

14 structural improvements.

15 A. No.

16 Q. During the time that Mr. Turigliatto operated

17 One-Hour Dry Cleaners, do you know whether or not there

18 were any underground storage tanks located at

19 712 Madison?

20 A. No, I don't.

21 Q. Mr. Turigliatto in his operations at One-Hour

22 Cleaners, during the time that he operated, do you know

23 whether or not he used Stoddard solvent in his dry

24 cleaning operations?

25 A. The name is familiar. Where I heard that name,

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1 it could have very easily have been from
 2 Mr. Turigliatto. I can't swear to it.
 3 Stoddard was a solvent that was used, if I'm
 4 not mistaken, prior to perchloroethylene. And I may
 5 have heard a story or two about Stoddard solvent from
 6 Mr. Turigliatto. I -- that's the only place I can think
 7 of that I might have heard the word or the term.
 8 Q. Okay. Do you know who Mr. Turigliatto
 9 purchased the business from?
 10 MR. FARRELL: Objection, lacks foundation,
 11 assumes facts.
 12 THE WITNESS: I don't recall the name right
 13 now.
 14 BY MR. GRAHAM:
 15 Q. Do you recall the name Harry Leigh?
 16 A. Yes.
 17 Q. Who is Harry Leigh?
 18 A. I believe that was the gentleman that
 19 Mr. Turigliatto purchased the business from.
 20 Q. Thank you.
 21 MR. FARRELL: Is that L-a-y, Doyle?
 22 MR. GRAHAM: I think it's L-e-i-g-h, but I'm
 23 not sure.
 24 MR. FARRELL: Thank you.
 25 BY MR. GRAHAM:

55

1 Q. Do you know anything about Mr. Leigh's
 2 operations of the dry cleaning business at 712 Madison?
 3 A. No.
 4 Q. Do you know if a dry cleaning business was
 5 operated prior to Mr. Leigh's operation of a dry
 6 cleaning -- well, strike that.
 7 So have you ever met Harry Leigh?
 8 A. No.
 9 Q. Don't know who the gentleman is?
 10 A. No.
 11 Q. Okay. Do you know whether or not he operated a
 12 dry cleaning business at 712 Madison?
 13 A. No.
 14 Q. Did you and Mr. Turigliatto ever have any
 15 conversations with respect to Mr. Harry Leigh?
 16 A. There were conversations over -- being my
 17 father-in-law, there were family gatherings. The dry
 18 cleaning business always seemed to come up in the
 19 conversation.
 20 I'm sure it was mentioned who he bought the
 21 business from. Until you mentioned the name, I couldn't
 22 recall the name, but I know he had told me that's who he
 23 bought the business from.
 24 Q. Did he tell you what type of -- strike that.
 25 Did you ever have any discussions with

56

1 Mr. Turigliatto with respect to any dry cleaning
 2 operations that Mr. Leigh may or may not have conducted
 3 at the 712 Madison property?
 4 A. No.
 5 Q. Do you know the name Gene Carter?
 6 A. Yes.
 7 Q. Who is Gene Carter?
 8 A. The name Gene Carter -- Mr. Turigliatto was a
 9 musician. Gene Carter was a musician. So that's all I
 10 know about Gene Carter, was conversations that might
 11 have been had about musical stuff.
 12 As far as referencing Gene Carter to that
 13 business, no, I can't add anything.
 14 Q. Okay. I think earlier we talked that
 15 Mr. Turigliatto had for some point of time during his
 16 operations operated 712 Madison as a franchise of
 17 One-Hour Martinizing; is that correct?
 18 MR. FARRELL: Objection.
 19 THE WITNESS: It was never a franchise.
 20 BY MR. GRAHAM:
 21 Q. It was never a franchise?
 22 A. Never.
 23 Q. Okay.
 24 A. I shouldn't say "never." During
 25 Mr. Turigliatto's operation, it was not a franchise.

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1 Q. How do you know that?
 2 A. Because the subject came up 25 years ago. I
 3 can remember -- because you've got -- One-Hour
 4 Martinizing -- at that time in 1979, there were One-Hour
 5 Martinizing all over the place. And I can recall
 6 talking about whether he purchased or someone asking him
 7 if he purchased a franchise, and he said, "No, it wasn't
 8 a franchise."
 9 Q. Okay.
 10 A. I don't know why I remember that, but I do.
 11 Q. That's fine.
 12 During Mr. Turigliatto's operations at
 13 712 Madison, do you know where he -- strike that.
 14 During Mr. Turigliatto's operations at
 15 712 Madison, are you familiar with any janitorial
 16 service that Mr. Turigliatto employed to take care of
 17 the 712 Madison property?
 18 MR. FARRELL: Objection, vague and ambiguous as
 19 to "take care" of the property.
 20 MR. GRAHAM: Okay. Let's try this again.
 21 Q. During Mr. Turigliatto's operations at the
 22 712 Madison property, are you aware of any janitorial
 23 service that Mr. Turigliatto hired for any purpose to
 24 perform at 712 Madison?
 25 A. No.

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1 Q. During the time that you operated at
 2 712 Madison, did you employ any janitorial service?
 3 A. No.
 4 Q. At the time that you purchased 712 Madison,
 5 the -- and I want to speak as to the inside of the
 6 interior of the building now.
 7 At the time that you purchased 712 Madison, the
 8 floors in the interior of 712 Madison, how would you
 9 describe the floors?
 10 A. Cement.
 11 Q. Cement. Did they have carpet?
 12 A. In the lobby area.
 13 Q. Otherwise they were cement floors?
 14 A. Correct.
 15 Q. Bare cement? There was no linoleum?
 16 A. Correct.
 17 Q. And at the time that you purchased the business
 18 from Mr. Turigliatto, do you recall any cracks in any of
 19 the cement floors within 712 Madison?
 20 A. I'm sure there were cracks.
 21 Q. Do you recall specifically where any of the
 22 cracks were?
 23 A. No.
 24 Q. You say you're sure that there are cracks.
 25 How -- why are you so sure?

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1 A. Cement cracks, Doyle. That was -- that's a
 2 fairly old building.
 3 Q. Okay. Do you know when that building was
 4 constructed?
 5 A. No, I don't.
 6 Q. During the time that you operated at
 7 712 Madison, did you make any modifications to the
 8 flooring?
 9 A. Replaced the carpet in the lobby area, put in a
 10 new counter in the lobby area. No alterations or
 11 modifications were done in back of the lobby area.
 12 Q. So the only modifications to the flooring
 13 during your operations at 712 Madison was the
 14 replacement of the carpet in the lobby area?
 15 A. Correct.
 16 Q. Anything else?
 17 A. No.
 18 Q. Okay. During the time that you operated at
 19 712 Madison, do you recall applying any sealants to the
 20 concrete floor?
 21 A. No.
 22 Q. And during the time that you operated at
 23 712 Madison, who all cleaned your floors?
 24 A. My wife and I.
 25 MR. FARRELL: Objection, assumes facts.

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1 BY MR. GRAHAM:
 2 Q. Well, let me ask you this, Mr. Duensing. In
 3 the -- strike that.
 4 During the time that you operated at
 5 712 Madison Street, who cleaned the floors within the
 6 interior of 712 Madison?
 7 A. My wife and I.
 8 Q. And how was that done?
 9 A. Broom. I don't recall. I'm sure there was a
 10 wet mop involved in cleaning the floor occasionally, but
 11 we just generally swept it out.
 12 Q. And how often would you say that you and your
 13 wife cleaned the floors within the interior of
 14 712 Madison?
 15 A. Oh, it was done a daily basis.
 16 Q. Daily basis. Did you ever take a hose and hose
 17 out the floor --
 18 A. No.
 19 Q. -- in the interior?
 20 A. No.
 21 Q. Were there any floor drains located within the
 22 interior of 712 Madison during the time that you
 23 operated at that property?
 24 A. I don't believe so.
 25 Q. During the time that you operated at

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1 712 Madison, was there any work done within the interior
 2 of that building which required that holes be drilled
 3 within the cement floors?
 4 A. There were during my ownership equipment
 5 changes. Those pieces of equipment had to be anchored
 6 to the cement floor.
 7 Now, those holes that were drilled for anchor
 8 bolts, I -- I did not personally drill them, but I don't
 9 believe they went all the way through the cement.
 10 They were three or four inches in to, you know,
 11 install an anchor bolt, but there -- no, there were no
 12 holes drilled clear through the cement.
 13 Q. Okay. And we'll get into the specifics of the
 14 equipment that you later on purchased to replace some of
 15 Mr. Turigliatto's equipment. We'll get into that later.
 16 But I just want to get an idea. You said at
 17 some point you needed to replace some equipment, and you
 18 put down anchor bolts.
 19 And I just kind of -- just generally, what
 20 types of pieces of equipment did you purchase whereby
 21 the installation required anchor bolts?
 22 A. Dry cleaning machine.
 23 Q. Anything else?
 24 A. There was a piece of equipment called a
 25 sniffer, s-n-i-f-f-e-r.

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1 Q. Anything else?

2 A. And that was a smaller piece of equipment, a

3 lighter piece of equipment, but it was still anchored to

4 the cement. That would have been required a lot less

5 drilling or anchor bolts than the machine itself.

6 Those are the only two pieces of equipment -- I

7 take that back. I did get a different press at one

8 time. And it had to be anchored down.

9 But, again, these -- the anchor bolts, I didn't

10 personally put them in, but to my knowledge they did not

11 go through.

12 And honestly, I don't know how thick that

13 cement floor is. But I can't imagine that an anchor

14 bolt would have to go into cement any more than three or

15 four inches, possibly.

16 Q. Sure. And that's all I wanted to know is

17 whereby, you know, bolts were drilled into the cement

18 floor.

19 A. Yeah, those -- those are the only pieces of

20 equipment that I can recall that required drilling into

21 the cement.

22 Q. During the time that you operated at

23 712 Madison, how many sinks were in the interior of the

24 building?

25 A. Sinks?

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1 Q. Sinks?

2 A. One.

3 Q. And how many restrooms?

4 A. One.

5 Q. And is that where the one sink was located?

6 A. Correct.

7 MR. GRAHAM: We've been going about an hour and

8 a half. Would you like to take a little break? A five-

9 to seven-minute break, and then we'll rejoin.

10 THE WITNESS: Sure.

11 MR. GRAHAM: All right.

12 (Recess taken.)

13 BY MR. GRAHAM:

14 Q. Mr. Duensing, you understand that even though

15 we took a break, you're still under oath?

16 A. One more time?

17 Q. You understand that even though we just took a

18 break, you're still under oath?

19 A. Yes.

20 Q. All right. And before we took our break, we

21 were talking a little bit about the interior and the

22 exterior of the building and some of the machines that

23 you had purchased.

24 What I'd like to do now is show you --

25 (Whereupon Exhibit No. 5 was then marked for

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1 identification.)

2 BY MR. GRAHAM:

3 Q. Mr. Duensing, you've been handed what's been

4 marked as Exhibit 5, the Commercial Lease and Deposit

5 Receipt, Bates RT 16 through RT 20.

6 You can take as much time as you want to review

7 this. I only have a couple of questions for you, and it

8 doesn't pertain to the lease agreement.

9 What I'm interested in is the diagram. If you

10 look in the bottom right-hand corner of the pages,

11 you'll see "RT" on the first page. It says RT 0016.

12 Do you see that?

13 A. Yes.

14 Q. Okay. If you'll turn to the page marked

15 RT 0019.

16 A. (Witness complied.)

17 Q. Are you there?

18 A. I'm there.

19 Q. Okay. Do you recognize this as a layout of the

20 712 Madison property?

21 MR. FARRELL: Belated objection, vague and

22 ambiguous as to time. Are you referring to when he

23 operated it, I assume, Doyle?

24 MR. GRAHAM: Yes.

25 THE WITNESS: With no footage registered there,

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1 I mean, it appears to be a lot longer and narrower than

2 I -- the window and the door is in the right location.

3 The door in the back is in the right location.

4 But other than that, that's about all I can add

5 to it. I mean, if I knew how wide or how long it was, I

6 might be able to --

7 BY MR. GRAHAM:

8 Q. Sure.

9 A. -- say "yes." But I mean, yes, it is a long,

10 narrow building.

11 Q. Okay. And in this depiction that we're looking

12 at that's Bates RT 19, do you see the location of the

13 restroom?

14 A. Yes.

15 Q. Okay. And is that the approximate location of

16 the restroom at the time that you purchased the

17 business?

18 A. Yes.

19 Q. Okay. What I'm going to give to you,

20 Mr. Duensing, is an additional copy of what we've been

21 looking at as RT 19. I'm going to give you a pen, and

22 if you would for me, when you purchased the property --

23 strike that.

24 When you purchased the business, if you could

25 mark on RT 19 the approximate location of the Martin dry

66

1 cleaning machine that we referred to later that you
 2 purchased from Mr. Turigliatto. Where was that located?
 3 A. (Witness complied.)
 4 Q. And if you would just draw a line out to the
 5 right and indicate what that piece of equipment was, the
 6 30-pound Martin.
 7 A. (Witness complied.) That's 25.
 8 Q. I'm sorry, it was 25.
 9 Okay. Now if you could also mark the location
 10 of where the reclamer was located at the time that you
 11 purchased the business from Mr. Turigliatto.
 12 A. (Witness complied.)
 13 Q. Okay. Now, when you purchased the business
 14 from Mr. Turigliatto, did you -- did you also purchase a
 15 boiler?
 16 A. Yes.
 17 Q. And if you would mark on RT 19 the approximate
 18 location of that boiler at the time that you purchased
 19 the business from Mr. Turigliatto.
 20 A. (Witness complied.)
 21 Q. And we're looking at RT 19. In the upper half
 22 of that picture, do you see where it says "private
 23 office"?
 24 A. Yes.
 25 Q. Was that a -- was that a private office when

67

1 you purchased the business from Mr. Turigliatto?
 2 A. No.
 3 Q. It was all open; it wasn't an enclosed office
 4 space?
 5 A. Correct.
 6 Q. Okay. At the time that you purchased the
 7 business from Mr. Turigliatto, did you also purchase
 8 presses?
 9 A. Yes.
 10 Q. And where were those presses located at the
 11 time that you purchased the business from
 12 Mr. Turigliatto?
 13 If you would just mark it on RT 19.
 14 A. (Witness complied.)
 15 Q. All right. Now, when you purchased the
 16 business from Mr. Turigliatto, you also purchased
 17 spotting boards, correct?
 18 A. One.
 19 Q. One. Would you put -- or strike that.
 20 Would you mark the location of the spotting
 21 board at the time that you purchased the business from
 22 Mr. Turigliatto?
 23 A. (Witness complied.)
 24 Q. Other than the equipment that we've just
 25 identified that you purchased from Mr. Turigliatto, at

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1 the time that you purchased the business, was there any
 2 other pieces of equipment that you purchased from
 3 Mr. Turigliatto at that time with respect to the dry
 4 cleaning business?
 5 A. Yes.
 6 Q. And what was that?
 7 A. It's called a Suzie. It's a piece of equipment
 8 that you would put a coat or a dress on, steams it from
 9 the inside. It had the bag that blows up and presses
 10 the garment from the inside. We referred to as a Suzie.
 11 Q. Okay. And that used steam?
 12 A. Correct.
 13 Q. Okay. Did you use any chemicals in the
 14 operation of that Suzie?
 15 A. No.
 16 Q. Okay. Now, if you just identify at the bottom
 17 for me -- strike that.
 18 If you'd identify at the bottom, if you would
 19 just write something to the effect, "at time of purchase
 20 from Mr. Turigliatto," so that we have some idea of the
 21 time period.
 22 A. Do you want me to put the Suzie in the --
 23 Q. No, that's fine. The Suzie's not --
 24 A. (Witness complied.)
 25 Q. All right. Thank you, sir. I'll take that

69

1 back from you.
 2 MS. McADAM: Doyle, how are we going to
 3 distinguish between the marked-up version and --
 4 MR. GRAHAM: Let's go off the record for a
 5 second.
 6 (Discussion off the record.)
 7 (Whereupon Exhibit No. 6 was then marked for
 8 identification.)
 9 BY MR. GRAHAM:
 10 Q. Mr. Duensing, in your conversations throughout
 11 the years with Mr. Turigliatto, do you recall any
 12 conversations with Mr. Turigliatto whereby he informed
 13 you of any accidental spills that occurred during his
 14 operations?
 15 MR. FARRELL: Objection, vague and ambiguous as
 16 to "spills."
 17 BY MR. GRAHAM:
 18 Q. Do you know what I mean when I say "spills"? I
 19 mean releases of PERC?
 20 A. I'm sure there were, Doyle. Exact amounts
 21 or -- in a transfer system you're going to have PERC
 22 that goes out on the floor.
 23 If the machine doesn't extract it properly and
 24 you go to take it from the dry cleaner to the reclamer,
 25 you put it in a cart or you hand-carry it, there's --

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1 the Bay Area Air Quality Control termed one drop of
 2 perchloroethylene a major spill.
 3 So did we have spills? Yes.
 4 MR. FARRELL: Objection, I'll move to strike as
 5 nonresponsive.
 6 BY MR. GRAHAM:
 7 Q. Sure. And what I'm asking you, Mr. Duensing,
 8 is in your conversations with Mr. Turigliatto, did he
 9 ever inform you of any incidences whereby PERC was
 10 accidentally spilled during his operations?
 11 A. Yes, I'm sure there were conversations.
 12 Q. And as you sit here today, do you recall the
 13 sum and substance of any conversations that you had with
 14 Mr. Turigliatto regarding accidental releases of PERC
 15 during his operations?
 16 A. No.
 17 Q. Do you recall any conversations with
 18 Mr. Turigliatto whereby Mr. Turigliatto informed you
 19 that there were any problems with any of the equipment
 20 that resulted in accidental spills of PERC?
 21 A. No.
 22 Q. Okay. Did he inform you of any boil-overs he
 23 had had?
 24 A. In the distillation process, we haven't even
 25 gotten to that yet. Would you like me to go into that

71

1 process?
 2 Q. Oh, no, we'll get into it. I just want to know
 3 if -- in the conversations with Mr. Turigliatto, if he
 4 ever informed you of any incidences where he had any
 5 boil-overs.
 6 A. Yes.
 7 Q. And did he -- did he inform you as to how often
 8 that had occurred?
 9 A. Not that often.
 10 Q. Could you give me a better idea as to --
 11 MR. FARRELL: Objection, calls for speculation.
 12 BY MR. GRAHAM:
 13 Q. -- how often?
 14 A. No.
 15 Q. But you do recall conversations with
 16 Mr. Turigliatto whereby he informed you that a boil-over
 17 had occurred during his operations?
 18 A. Yes.
 19 Q. Did he tell you how he addressed that
 20 boil-over?
 21 A. Not really how to address it as much as prevent
 22 it.
 23 Q. And what did he tell you?
 24 A. Cooling water.
 25 Q. What do you mean by "cooling water"?

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1 A. Again, we're going to get into the distillation
 2 process.
 3 Q. Well, I said, "And what did he tell you?" and
 4 you said, "Cooling water." I'm not quite sure what you
 5 mean.
 6 A. Well, when we were talking about preventing of
 7 boil-overs, boil-overs, the term boil-over applies to
 8 the distillation -- in -- in my thinking, applies to the
 9 distillation process.
 10 Prevention of boil-overs in the distillation
 11 process can be controlled with cooling water.
 12 Q. How so?
 13 A. Increase it.
 14 Q. In your conversations with Mr. Turigliatto
 15 throughout the years, did Mr. Turigliatto ever inform
 16 you as to events whereby he would use sludge, PC sludge,
 17 to kill weeds?
 18 A. No.
 19 Q. Okay. Have you ever -- are you familiar with
 20 that practice? You ever heard about that?
 21 A. No.
 22 Q. Okay. Now, we were talking earlier, when you
 23 purchased the business from Mr. Turigliatto, that he
 24 remained on for approximately 30 days to kind of oversee
 25 the operations, correct?

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1 A. Correct.
 2 Q. Okay. And Mr. Turigliatto provided to you
 3 information with respect to how to change the filters,
 4 we talked about that earlier, correct?
 5 A. Correct.
 6 Q. Okay. Did Mr. Turigliatto ever provide you
 7 information with respect to how to back-wash the filter
 8 unit?
 9 A. No.
 10 Q. "No"?
 11 Did Mr. Turigliatto prior to your purchase of
 12 the business provide you information with respect to how
 13 often the filter unit should be back-washed?
 14 A. It was all determined by that pressure,
 15 pressure gauge.
 16 Q. Okay. And in your operations at 712 Madison,
 17 you back-washed the filters, correct?
 18 A. I don't know what you mean by "back-wash."
 19 Q. Okay. You haven't heard that term with respect
 20 to the filter units?
 21 A. No.
 22 Q. Okay. At the 712 Madison location,
 23 Mr. Duensing, do you know where the sewer lateral is at
 24 that property?
 25 A. No.

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1 Q. Do you know what a sewer lateral is?
 2 A. No.
 3 Q. Okay. Do you recall in your business
 4 operations at 712 Madison whether you had any backups of
 5 any sewer pipes?
 6 A. I don't recall a backup, no.
 7 Q. Any flooding within the 712 Madison during the
 8 time --
 9 A. No.
 10 Q. -- that you operated?
 11 A. No.
 12 Q. Any broken water pipes?
 13 A. No.
 14 Q. Okay. Were there any machines -- when you
 15 purchased the business from Mr. Turigliatto, were there
 16 any dry cleaning machines or machines associated with
 17 dry cleaning that you did not purchase from
 18 Mr. Turigliatto?
 19 MR. FARRELL: Objection.
 20 THE WITNESS: No.
 21 MR. FARRELL: -- vague.
 22 BY MR. GRAHAM:
 23 Q. Give him just one second to put in his
 24 objection. Did you hear Mr. Farrell?
 25 A. Oh, no, I didn't.

75

1 Q. Oh, okay.
 2 MR. FARRELL: I just objected it was ambiguous.
 3 But you understood it, so that's fine.
 4 MR. GRAHAM: I just wanted you to give him a
 5 second to put in the objection.
 6 THE WITNESS: I'm a bit confused. You're
 7 objecting for your clients.
 8 MR. FARRELL: Just to the form of the question
 9 only. But if you understand it, you're free to respond.
 10 THE WITNESS: Okay.
 11 BY MR. GRAHAM:
 12 Q. Again, Mr. Duensing, they're only making
 13 objections so that they can take it to a judge at a
 14 later point in time and argue that my question was
 15 improper. So please don't let them distract you.
 16 A. Okay.
 17 Q. It's merely for the record, and it's just
 18 merely to preserve their objections.
 19 A. Okay. I just -- okay.
 20 MR. FARRELL: Could you read that one back so
 21 that we're all refreshed on it?
 22 (Whereupon the reporter read back the following
 23 testimony:
 24 "Q. Okay. Were there any
 25 machines -- when you purchased the

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1 business from Mr. Turigliatto, were
 2 there any dry cleaning machines or
 3 machines associated with dry cleaning
 4 that you did not purchase from
 5 Mr. Turigliatto?
 6 "A. No.")
 7 THE WITNESS: Correct.
 8 BY MR. GRAHAM:
 9 Q. During Mr. Turigliatto's operations at
 10 712 Madison, do you know how he stored PERC at the
 11 business location?
 12 A. I don't believe there was any storage of
 13 perchloroethylene at all, other than the tanks of the
 14 machine.
 15 Q. To your knowledge --
 16 MR. SHAMIYEH: You speak "machine." Which
 17 machine are you --
 18 THE WITNESS: The dry cleaning machine.
 19 MR. FARRELL: This is during Mr. Turigliatto's
 20 period of operation you're speaking of?
 21 THE WITNESS: Yes. Correct.
 22 MR. FARRELL: Okay.
 23 BY MR. GRAHAM:
 24 Q. Okay. So to your knowledge, Mr. Turigliatto
 25 didn't keep an extra barrel or drum of PCE handy?

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1 A. To the best of my knowledge, no.
 2 Q. During your conversation --
 3 A. Now, Doyle, let me -- let me insert,
 4 Mr. Turigliatto ran that business for 20 years. I was
 5 not in that business until approximately 1979. I -- I
 6 would have to say I cannot absolutely say anything
 7 didn't happen, okay, during his operation.
 8 I don't want to let anybody know that I'm the
 9 absolute answer for how he ran his business. I can't
 10 say that for a fact.
 11 When I took over the business, there was no
 12 storage of PERC in the building.
 13 Q. Okay. Was there any -- when you took over the
 14 business, was there any storage of PERC outside of the
 15 building?
 16 A. No.
 17 Q. And during the time that you operated at
 18 712 Madison, did you store any excess PERC within the
 19 building?
 20 A. No.
 21 Q. Other than what was in the dry cleaning
 22 machine?
 23 A. No.
 24 Q. Okay. And during your operations at
 25 712 Madison, did you ever store any additional PERC

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1 outside of the building?

2 A. No.

3 Q. Okay. In your conversations with

4 Mr. Turigliatto, did he ever tell you of how he disposed

5 of wastewater that was generated by the dry cleaning

6 operations?

7 A. The term wastewater is -- I don't think the

8 term -- it's a term I'm not familiar with.

9 Q. Okay. Sure. What I'm getting at is you

10 understand that the reclaimer that Mr. Turigliatto had

11 during his operations at 712 Madison, that that

12 reclaimer would essentially reclaim PERC from the

13 washing unit, or the dry cleaning unit, correct?

14 A. Correct.

15 Q. Okay. And it did that by -- by way of a

16 heating coil and a cooling coil, correct?

17 A. Correct.

18 Q. Okay. And what were the purposes of those

19 heating coils and cooling coils?

20 A. Separate solvent from moisture.

21 Q. Okay. And when it separated the solvent from

22 the moisture, that moisture I'm talking about, that

23 wouldn't go back into the dry cleaning machine, correct?

24 A. There was a percentage, I mean very minuscule,

25 but there was some.

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1 Q. And the PERC would go back into the dry

2 cleaning unit, correct?

3 A. Correct.

4 Q. And then there would be the moisture or the

5 water, the residual moisture of the water that would

6 come out of that unit, correct?

7 A. Yes.

8 Q. Okay. That's what I'm referring to as

9 wastewater.

10 A. Okay.

11 Q. Okay. So this wastewater stream that would

12 come off of the reclaimer during Mr. Turigliatto's

13 operations, did you ever have any conversations with

14 Mr. Turigliatto discussing how he disposed of this

15 wastewater, this moisture that was coming out of the

16 reclaimer?

17 A. No.

18 Q. During Mr. Turigliatto's operations at

19 712 Madison, do you know whether the reclaimer was

20 plumbed to the sewer?

21 A. No.

22 Q. You don't know one way or the other?

23 Do you know if the dry cleaning unit was

24 presumed to the sewer?

25 A. No.

80

1 MR. FARRELL: Objection, vague as to "plumb,"

2 but you're free to respond.

3 BY MR. GRAHAM:

4 Q. So just to be clear, you don't know one way or

5 the other how any of the dry cleaning equipment during

6 Mr. Turigliatto's operations, whether or not that

7 equipment was plumbed to the sewer?

8 A. Correct.

9 Q. Okay. Now, you took over -- strike that.

10 You purchased the business from Mr. Turigliatto

11 in approximately 1979, correct?

12 A. Correct.

13 Q. Okay. And you used the same machines that he

14 had when you first purchased the business?

15 A. Correct.

16 Q. What year did you first make any changes to the

17 type of PERC dry cleaning equipment that was used? An

18 estimate is fine, Mr. Duensing, I don't need an exact

19 date.

20 A. I'd say within about the first five years.

21 Maybe, maybe eight years.

22 Q. So late '80s?

23 A. Oh, I would say early '80s.

24 Q. Early '80s. Okay. Well, you purchased the

25 business in 1979, correct?

81

1 A. Correct.

2 Q. Okay. And then you said within the first five

3 to eight years, so that would put us about --

4 A. Okay, so mid '80s.

5 Q. Mid '80s, that's fine.

6 A. Okay.

7 Q. Now, from 1979 when you first purchased the

8 business up until the mid '80s when you purchased some

9 additional equipment, did you move any of the equipment

10 that was originally there, Mr. Turigliatto's old

11 equipment? Did you move that to a different location

12 within the building?

13 A. No.

14 Q. Okay. So if we look at Exhibit No. 6, that

15 equipment, that dry cleaning equipment was in that

16 location up until the time that you purchased additional

17 equipment or newer equipment in the mid '80s?

18 A. Correct.

19 Q. Okay. During the time that you operated at

20 712 Madison, did you make any modifications whatsoever

21 to any of the plumbing or piping that was located within

22 the interior of 712 Madison?

23 A. No.

24 Q. Do you know if the landlords, Ragle or

25 Tomasini, during the time that you operated at

82

1 712 Madison made any modifications to any of the
 2 plumbing within the interior of 712 Madison?
 3 A. Within the interior, no.
 4 Q. What about within the exter- -- strike that.
 5 What about the exterior?
 6 MR. FARRELL: Those are plumbing and piping
 7 modifications?
 8 MR. GRAHAM: Yes.
 9 THE WITNESS: Not that I'm aware of.
 10 BY MR. GRAHAM:
 11 Q. Okay.
 12 A. I will have to say they were -- they were very
 13 good about notifying their tenants when anything was
 14 going to happen.
 15 So from that standpoint, I can pretty much say,
 16 I don't believe there were any modifications.
 17 Q. Because you weren't notified, correct?
 18 A. Correct.
 19 Q. All right. And during the time that you
 20 operated at 712 Madison, was there any work whatsoever
 21 done to the foundation of the building?
 22 A. I don't believe so.
 23 Q. Okay. Now what I'd kind of like to go over,
 24 Mr. Duensing, is some of the operations that
 25 Mr. Turigliatto conducted during the time that he

83

1 operated the business.
 2 And I know you probably won't know all the
 3 operations, but I want to go through some and try to get
 4 an idea as to what you know and don't know --
 5 A. Sure.
 6 Q. -- with respect to his operations.
 7 Did Mr. Turigliatto in his operation of
 8 One-Hour Cleaners, did he provide waterproofing
 9 services?
 10 A. Yes.
 11 Q. Okay. And do you have any personal knowledge
 12 as to how Mr. Turigliatto conducted waterproofing
 13 operations during the time that he operated at
 14 712 Madison?
 15 A. Yes, I do.
 16 Q. Go ahead and tell me.
 17 A. There was a -- let's call it a chemical, a
 18 waterproofing chemical.
 19 Q. Let me stop you right there.
 20 Do you know what the name of that waterproofing
 21 chemical was?
 22 A. I want to say Seal Cote.
 23 Q. How about Swan Cote? Swan Cote?
 24 A. It could be. Could be.
 25 Q. Go ahead.

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1 A. Seal Cote just popped into my head.
 2 Q. Okay.
 3 A. We obtained that from our vendors and --
 4 Q. I just want to stop you. I want to be clear
 5 that I'm talking about Mr. Turigliatto's operations.
 6 A. Yes.
 7 Q. Okay. You said "we," so --
 8 A. We, yes. Well -- yes.
 9 Q. Okay.
 10 A. He purchased Seal Cote, Swan Cote, from our
 11 vendors.
 12 Q. Who would that be?
 13 A. One -- I don't know exactly who he might have
 14 purchased it from. We had Echo Sales, Goss-Jewett, Work
 15 Room Supply.
 16 Q. Anyone else?
 17 A. Those -- those were the three major vendors
 18 that we dealt with.
 19 Q. Okay.
 20 A. "We," here we go again.
 21 Q. That's fine. And again, we're just talking
 22 about Mr. Turigliatto's --
 23 A. Sure.
 24 Q. -- waterproofing operation.
 25 A. Sure. I'm confident he dealt with the same

85

1 same vendors as I did.
 2 Q. Okay. And how did Mr. Turigliatto conduct the
 3 waterproofing operations? What was done?
 4 A. Per the directions on the product. It was a
 5 five-to-one mixture perchloroethylene and Seal Cote.
 6 Q. How did he mix these?
 7 A. In a bucket.
 8 Q. And then what was done?
 9 A. The garment was soaked in that bucket, left for
 10 a period of time, I don't recall how long. It was
 11 removed from the bucket, put in the dry cleaning
 12 machine, and extracted.
 13 Q. Put in the dry cleaning machine or put in the
 14 reclaimer?
 15 A. Dry cleaning machine.
 16 Q. The dry cleaning. And then after it was put in
 17 the dry cleaning machine, was it also put in the
 18 reclaimer?
 19 A. Yes.
 20 Q. Okay. And approximately where within the
 21 building were these waterproofing operations conducted?
 22 MR. FARRELL: If you know. Objection, calls
 23 for speculation.
 24 THE WITNESS: Generally, right between the dry
 25 cleaning machine and the reclaimer.

86

1 BY MR. GRAHAM:
 2 Q. Okay. As depicted on Exhibit No. 6 there?
 3 A. Correct.
 4 Q. Okay. Do you recognize a product by the name
 5 of Sta-Dri? Sta-Dri, S-t-a-D-r-i?
 6 A. Doesn't sound familiar.
 7 Q. What about Adco, A-d-c-o, water repellent?
 8 A. No.
 9 Q. How big was this bucket that you would mix your
 10 five parts PERC with -- well, strike that.
 11 You said the mixture was a mixture of five
 12 parts PERC and one part what?
 13 A. Seal Cote.
 14 Q. Seal Cote. Okay.
 15 So how big was this bucket that Mr. Turigliatto
 16 would mix the Seal Cote with the PERC?
 17 A. Maybe two-gallon bucket. And trust me, it was
 18 not an exact science. Well, I can't vouch for
 19 Mr. Turigliatto, so we'll just leave it at that.
 20 Q. Okay. That's fine. And during
 21 Mr. Turigliatto's operations at 712 Madison with respect
 22 to waterproofing, did he waterproof one garment at a
 23 time, or were there multiple garments put in this
 24 two-gallon bucket?
 25 A. I, again, can't vouch for how Mr. Turigliatto

87

1 waterproofed garments.
 2 Q. Okay. Let's switch now and then talk about
 3 your operations.
 4 Did you also provide waterproofing services
 5 during your operations at 712 Madison?
 6 A. Yes.
 7 Q. Okay. For how long?
 8 A. For how long?
 9 Q. Strike that.
 10 Did you provide those services during the
 11 entirety of your operations at 712 Madison?
 12 A. Yes.
 13 Q. Okay. And did you also use a Seal Cote or Swan
 14 Cote as a product for waterproofing?
 15 A. Yes.
 16 Q. Okay. During the whole time?
 17 A. No.
 18 Q. Okay. When did that stop?
 19 A. I used Swan Cote, the waterproofing product,
 20 for probably only a couple years after I took over.
 21 Through '81, let's say.
 22 Q. And why did you stop using Swan Cote?
 23 A. I didn't care for the process.
 24 Q. Why? What bothered you about the process?
 25 A. Spillage.

88

1 Q. And were there times during the operations at
 2 712 Madison where accidents happened that resulted in
 3 the spillage of PERC during the waterproofing
 4 operations?
 5 A. No, I'm referring to taking the garment out of
 6 the bucket, putting it in the reclaimer, there was
 7 spillage.
 8 Q. Okay. Of this five-one mixture that we were
 9 speaking of earlier?
 10 A. Correct, correct.
 11 Q. And those accidental spills happened during the
 12 time that you operated at 712 Madison?
 13 A. Yes.
 14 Q. Okay. So you provided waterproofing operations
 15 for a couple years after you purchased approximately
 16 till 1981; is that correct?
 17 A. Correct.
 18 Q. And then you stopped waterproofing -- providing
 19 waterproofing services to your customers?
 20 A. No.
 21 Q. You did it in a different manner?
 22 A. Yes.
 23 Q. And what manner did you do it?
 24 A. Spray can, aerosol spray can.
 25 MR. SHAMIYEH: I couldn't hear that, please?

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1 THE WITNESS: I'm --
 2 MR. GRAHAM: Aerosol spray.
 3 THE WITNESS: Aerosol spray can.
 4 MR. SHAMIYEH: Okay.
 5 BY MR. GRAHAM:
 6 Q. Okay. And so could you describe for me the
 7 processes whereby you would waterproof using an aerosol
 8 spray can?
 9 A. Garment was hung up and sprayed with the
 10 aerosol spray can.
 11 Q. And what product was contained within this
 12 aerosol spray can?
 13 A. I don't recall.
 14 Q. It wasn't the same one that you'd used in the
 15 liquid for the five-one mixture?
 16 A. No. It was a product that you could still buy
 17 today in the stores for waterproofing.
 18 Q. Okay.
 19 A. I don't recall the brand, to be honest with
 20 you.
 21 Q. That's fine. And where did your
 22 waterproofing -- strike that.
 23 With respect to your waterproofing operations
 24 related to the spray aerosol can, where approximately
 25 within the 712 Madison building, where did those

90

1 operations take place?
 2 A. Generally, in the back door.
 3 Q. Right by the back door? Okay.
 4 Did you actually hang the garment, open the
 5 door and hang the garment there for aeration purposes?
 6 A. Yes.
 7 Q. Okay.
 8 MR. GRAHAM: Why don't we go off the record for
 9 a second.
 10 (Discussion off the record.)
 11 MR. GRAHAM: All right. Back on.
 12 Q. Mr. Duensing, during Mr. Turigliatto's
 13 operations at 712 Madison, did he perform any drapery
 14 cleaning services?
 15 A. Yes.
 16 Q. And do you know how he performed those drapery
 17 cleaning services?
 18 MR. FARRELL: Objection, calls for speculation.
 19 THE WITNESS: No.
 20 BY MR. GRAHAM:
 21 Q. Okay. That's fine. I don't want you to guess
 22 at anything. But if you have personal knowledge or you
 23 spoke to him about how he cleaned his draperies, I'd
 24 like to know that.
 25 A. Part of the process during his 30-day stay

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1 included drapery cleaning.
 2 Q. When you say "included drapery cleaning," do
 3 you mean that he was the one that did it or he
 4 was the --
 5 A. He was telling me how to clean drapes,
 6 instructing me.
 7 Q. What were his instructions?
 8 A. Obviously, care was critical because draperies
 9 that are hung in a window that have constant sun, the
 10 fabric is weakened. And in regards to our process here,
 11 they're not treated any differently. They're put in the
 12 dry cleaning machine. They are tumbled; they are
 13 cleaned.
 14 They are -- in the transfer machine they are
 15 taken out and put in the reclaimer, and then they are
 16 hung up on a machine to pleat them.
 17 And that's how that will process was completed.
 18 Q. During the time that Mr. Turigliatto operated
 19 712 Madison, do you know where he hung the drapes, where
 20 the pleating machine was located?
 21 A. Pretty much midway in the building.
 22 Q. Okay. And you're pointing to Exhibit No. 6, to
 23 the right-hand sidewall?
 24 A. Correct.
 25 Q. About the middle of the building?

92

1 A. Right.
 2 Q. Okay. And during your operations at
 3 712 Madison did you also provide drapery cleaning
 4 services?
 5 A. Yes.
 6 Q. And did you do it in the same manner that
 7 Mr. Turigliatto had?
 8 A. Yes.
 9 Q. And did you provide drapery cleaning services
 10 throughout the whole time that you operated at
 11 712 Madison?
 12 A. Yes.
 13 Q. There was no period of time, like the
 14 waterproofing, whereby you stopped or changed the
 15 processes?
 16 A. No.
 17 Q. Okay. Did Mr. Turigliatto during the time he
 18 operated at 712 Madison provide any moth proofing
 19 services?
 20 A. Not to my knowledge.
 21 Q. Did you?
 22 A. No.
 23 Q. Did Mr. Turigliatto during his operations at
 24 712 Madison provide any restoration or preservation of
 25 wedding gowns?

93

1 A. Yes.
 2 Q. Okay. And how was that done during the time
 3 that he operated, if you know?
 4 A. I can only respond how he instructed me to do
 5 it.
 6 Q. Okay. How did he instruct you?
 7 A. A wedding gown is the same as any other
 8 garment. It was dry cleaned, dried, obviously caution
 9 with a wedding gown, and then it was put into a box and
 10 sealed up.
 11 These boxes we got from vendors, and it had
 12 forms inside the box -- she's smiling. I think she
 13 knows exactly what I'm talking about.
 14 The box is sealed up and preserved. There's no
 15 air. It isn't vacuumed out or anything, but with this
 16 box being sealed up, it preserves the gown from
 17 yellowing and insects or --
 18 Q. And that is -- what you've just described,
 19 those are the operations -- strike that.
 20 What you've just described, that is how you
 21 conducted restoration and preservation of wedding gowns
 22 during the time that you operated at 712 Madison?
 23 A. Yes.
 24 Q. Okay. During the time that Mr. Turigliatto
 25 operated at 712 Madison, did he provide any rubberizing

94

1 services?
 2 A. Rubberizing?
 3 Q. Yeah.
 4 A. No.
 5 Q. Did you?
 6 A. No.
 7 Q. Did Mr. Turigliatto during the time that he
 8 operated at 712 Madison provide any plasticizing
 9 services?
 10 A. No.
 11 Q. Did you?
 12 A. No.
 13 Q. Do you know what plasticizing is?
 14 A. No.
 15 Q. During Mr. Turigliatto's operations at
 16 712 Madison, did he provide any services with respect to
 17 flame retardant?
 18 A. I want to say yes.
 19 Q. What makes you want to say "yes"?
 20 A. Because I believe there was a conversation
 21 somewhere along the line about -- this 30 days included
 22 a lot of things.
 23 Q. A lot of time to talk to Mr. Turigliatto?
 24 A. I think during his tenure he did do some flame
 25 retarding.

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1 Q. And do you know how he performed those
 2 operations?
 3 A. No.
 4 Q. Did you have any discussions with --
 5 A. Because I did not. So I wasn't the least bit
 6 interested in how it was performed.
 7 Q. You said, "Because I did not." You mean you
 8 did not provide those types of services --
 9 A. Correct.
 10 Q. -- the flame retardant services?
 11 A. Correct.
 12 Q. Okay. During the time that Mr. Turigliatto
 13 operated at 712 Madison, did he provide any suede or
 14 leather cleaning?
 15 A. Yes.
 16 Q. Okay. Do you know how he conducted those
 17 services?
 18 A. We contracted it out.
 19 Q. Oh, you contracted it out?
 20 A. Outsourced.
 21 Q. To whom?
 22 A. Oh, my goodness. There were two or three
 23 different suede and leather cleaners that came around
 24 the area. I cannot recall the names. I may be able to
 25 come up with it going through my canceled checks, but I

96

1 do not recall any of the names.
 2 Q. So to your knowledge, no suede or leather
 3 cleaning services were provided by Mr. Turigliatto when
 4 he operated at 712 Madison?
 5 A. No.
 6 Q. And what about with respect to your operations
 7 at 712 Madison, did you provide any suede or leather
 8 cleaning?
 9 A. No.
 10 Let me add to that, it was a very expensive
 11 proposition from the customer's standpoint. Obviously,
 12 there was a margin involved that we adhered to. If for
 13 any reason the directions -- there were some leathers
 14 that could be dry cleaned.
 15 But perchloroethylene removes oil, okay. So if
 16 you took a standard leather garment and put it in
 17 perchloroethylene, it would be stiff as a board because
 18 it would take all the oil out of it.
 19 There were some leathers around that were
 20 dry-cleanable. So if we came across one of those, we
 21 would dry clean it in the same solvent that we used day
 22 in and day out.
 23 95 percent of the time it was outsourced.
 24 Q. Okay. Because those were the types of leathers
 25 that required a special application rather than --

97

1 A. Correct.
 2 Q. During Mr. Turigliatto's operations at
 3 712 Madison, did he provide any -- strike that.
 4 During Mr. Turigliatto's operations at
 5 712 Madison, did he provide any sizing services?
 6 A. Not that I'm aware of.
 7 Q. Okay. In that 30-day period where he was
 8 instructing you as to the ins and outs of the dry
 9 cleaning operations, did you have any conversations with
 10 Mr. Turigliatto with respect to sizing?
 11 A. No.
 12 Q. And during your operations at 712 Madison, did
 13 you perform any sizing operations?
 14 A. Yes.
 15 Q. And did you use a solid or a liquid in those
 16 sizing operations? Strike that. That's not --
 17 During the time that you operated at
 18 712 Madison, I'm speaking of the entire time, did your
 19 sizing -- the way in which you performed sizing
 20 operations, did that change at any point in time?
 21 A. No.
 22 Q. Okay. So it was the same the entire way
 23 through?
 24 A. Yes.
 25 Q. Okay. And in the processes related to sizing

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1 that you performed at 712 Madison, did you use a solid
 2 or liquid for that process?
 3 A. It was an aerosol, so I guess you could term
 4 that as liquid.
 5 Sizing, Doyle, is just one step down from
 6 starch. There were occasions when customers didn't want
 7 their garments starched. We did do dress shirts. The
 8 majority of our laundry was contracted out, outsourced,
 9 because I was strictly dry cleaning.
 10 If we had a customer that was unhappy with the
 11 outsource, we did it ourselves, we would use an aerosol
 12 sizing or a spray starch. Spray sizing, spray starch.
 13 Q. Okay. Do you recall the name of the product
 14 that you used as an aerosol sizing?
 15 A. No. Over-the-counter.
 16 Q. Okay. So you didn't perform sizing by using
 17 the dry cleaning machines?
 18 A. No.
 19 Q. Okay. And you didn't add any sizing beads to
 20 the dry cleaning machines to help you perform any
 21 sizing?
 22 A. No.
 23 Q. Okay. And all of your sizing was strictly
 24 aerosol?
 25 A. Correct.

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1 Q. Are you familiar with a product called
 2 Gelatone?
 3 A. No.
 4 Q. And this aerosol sizing that you described,
 5 that's a process that occurs after the dry cleaning
 6 process on the garment, correct?
 7 A. Correct.
 8 Q. And then are those garments hung like the
 9 drapes were hung or --
 10 A. No.
 11 Q. Okay.
 12 A. The sizing and/or starch was applied during the
 13 pressing process.
 14 Q. Okay. Now, I believe you had indicated
 15 earlier, Mr. Duensing, that during your operations at
 16 712 Madison that it was your wife who was in charge of
 17 the spotting, the spotting tables?
 18 A. No, I never said that.
 19 Q. You didn't testify -- okay, I'm sorry.
 20 Well, let me ask you. During the time that you
 21 operated at 712 Madison, you indicated that your wife
 22 also worked there, correct?
 23 A. Yes.
 24 Q. Okay. And what were her responsibilities
 25 during the time that you operated at 712 Madison?

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1 A. Pressing and waiting on the counter.
 2 Q. That's it?
 3 A. Yes.
 4 Q. Okay. So then I take it -- strike that.
 5 Other than yourself and your wife, were there
 6 any other people that worked at One-Hour Cleaners during
 7 the time that you owned and operated One-Hour Cleaners?
 8 A. Yes.
 9 Q. And who were those folks?
 10 A. I had a part-time presser. Her name was Alma
 11 Porter.
 12 Q. Okay. Do you know if Alma Porter is still
 13 alive?
 14 A. She's deceased.
 15 Q. Okay. Anyone else?
 16 A. And that was -- that was the only other person.
 17 My daughter came in when she was a teenager and pressed
 18 some clothes and assembled clothes.
 19 When I say "assembled," obviously, you've got
 20 tickets for customers, and she would take the finished
 21 product and assemble those with the tickets. She was
 22 never involved in any of the production end of it.
 23 Q. You said this was your daughter or
 24 daughter-in-law?
 25 A. Daughter.

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1 Q. Daughter. And what is her name?
 2 A. Marlee, M-a-r-l-e-e, Gradias, G-r-a-d-i-a-s.
 3 Doyle, I could probably count on one hand the
 4 number of days that she was there, but she wasn't paid.
 5 So I don't know if you want to consider that an employee
 6 or not. I mean, you're talking about people that
 7 were --
 8 Q. People that worked there, whether they were on
 9 the payroll or not --
 10 A. Okay.
 11 Q. -- I want to know people that worked there.
 12 A. Sure.
 13 Q. Anyone else besides Alma and Marlee?
 14 A. No.
 15 Q. Okay. During your operations at 712 Madison,
 16 were you the person responsible for wet spotting or dry
 17 spotting?
 18 A. Yes.
 19 Q. What I'd like to do is run down a list of kind
 20 of chemicals, products, and see if you recognize any of
 21 these, if these were any of the stuff that you may have
 22 used during your operations.
 23 A. Okay.
 24 Q. Let me ask you first, during Mr. Turigliatto's
 25 operations at 712 Madison, do you know who did his

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1 spotting?
 2 MR. FARRELL: Objection, calls for speculation.
 3 THE WITNESS: Honestly, no.
 4 BY MR. GRAHAM:
 5 Q. Okay.
 6 A. His components were the same as mine. It was
 7 he and his wife.
 8 Q. Okay.
 9 A. Who actually did the spotting, I do not know.
 10 Or whether they both did the spotting, I don't know.
 11 Q. All right. Let's go through some of these and
 12 see if you recognize any of these.
 13 During your operations at 712 Madison, did you
 14 ever use a product called Fast PR?
 15 A. No.
 16 Q. "No"?
 17 A. No.
 18 Q. Did you ever use in your operations at
 19 712 Madison any catatonic injection detergent?
 20 A. No.
 21 Q. "No"? Do you know what that is?
 22 A. No, I don't. I know I never had anything
 23 called that.
 24 Q. No, that's fine. I just want to know if you
 25 were familiar with that product and --

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1 A. No.
 2 Q. -- what it was used for.
 3 Did you -- in your spotting operations at
 4 712 Madison, did you ever use any leveling agents?
 5 A. Leveling agent?
 6 Q. Uh-huh. A spot and stain leveler?
 7 A. I'm sorry?
 8 Q. A spot and stain leveler?
 9 A. No.
 10 Q. Did you use any POG spotting agents?
 11 A. Correct me. POG is a brand name, isn't it?
 12 Q. Paint-oil-grease?
 13 A. Oh, paint -- okay. Yes.
 14 Q. Do you recall what names of POG products that
 15 you used, specific names?
 16 A. I thought you were going to tell me.
 17 Q. Maybe not yet. We'll see.
 18 A. Doyle, I can't remember the names, per se, but
 19 POG, yes.
 20 Q. Okay.
 21 A. Obviously, those were some of the stains
 22 that -- I can't remember the names.
 23 Q. Let me ask you, did you ever order -- or strike
 24 that.
 25 During your operations at 712 Madison, who were

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1 the primary folks that you ordered the spotting agents
 2 from?
 3 A. Those three names that I mentioned earlier:
 4 Echo Sales, Goss-Jewett, G-o-s-s-J-e-w-e-t-t, and Work
 5 Room Supply.
 6 Q. Do you recall in your operations at 712 Madison
 7 ever using a product called Laidlaw POG?
 8 A. Laidlaw was one of the brands. I'm not sure
 9 whether there was an individual bottle called POG. I
 10 had some Laidlaw products. I don't ever recall using
 11 something called POG, though. I broke it down into, you
 12 know -- I never used a POG, no.
 13 Q. Do you recall any specific products that you
 14 used that were manufactured by Laidlaw?
 15 A. I think at one point I used a Laidlaw
 16 waterproofer. I think Laidlaw was one of the vendors
 17 that provided waterproofer.
 18 Q. But nevertheless, you did use POG spotting
 19 agents?
 20 A. Yes.
 21 Q. Okay.
 22 A. Street's, just like Street's. That was the
 23 major brand of the products I used. Street's had a line
 24 of products for mustard, paint, oil, and each one came
 25 in a bottle, and that's what I used, Street's products.

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1 Q. Do you know how much POG spotting agent that
 2 you would use say in a typical year, or month, or
 3 however you want to break it down? Just to give me an
 4 idea of how much was being used.
 5 A. I would say I probably went through two gallons
 6 a year? That may be on the high side. Obviously, some
 7 stains are more frequent than others, and you're going
 8 to use that staining agent more than the others. But it
 9 wouldn't have been any more than that.
 10 Q. Okay.
 11 MR. FARRELL: Could I ask a question to clarify
 12 here? Mr. Duensing, the Street products you just
 13 referred to, were those spotting products or were you
 14 referring to dry cleaning products, generally?
 15 THE WITNESS: Spotting products.
 16 MR. FARRELL: Thank you.
 17 BY MR. GRAHAM:
 18 Q. In your operations at 712 Madison,
 19 Mr. Duensing, did you ever use any silk prespotters?
 20 A. Silk prespotters?
 21 Q. Yes.
 22 A. Yes.
 23 Q. Okay. What types of silk prespotters did you
 24 use? The names?
 25 A. I don't recall the name.

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1 Q. Do you recall --

2 A. I'm trying to think of the context that we

3 used -- I can remember silk prespotters -- no, let's go

4 back. It wasn't a prespotter. What it was, was -- silk

5 is tough to spot to begin with, colorwise, particularly

6 the color red.

7 If there was a stain, you could get the spot

8 out, but the chances of the color coming out with it

9 were real great, and you would not know that until after

10 you dry cleaned it. You dry clean it, and the color

11 comes out.

12 There was a product that we used, I'm not sure

13 if it was a prespotter, but we could take that garment,

14 put it in that product, and it would kind of bleed the

15 dye in that garment so that you would not lose the -- it

16 would cover up the spot that you put in it from spotting

17 it.

18 Q. So you actually immerse the garment in this

19 product?

20 A. Yes.

21 Q. Okay.

22 A. Very much like the waterproofing.

23 Q. And what size container did you use for that?

24 A. Same, same size.

25 Q. Are you familiar with a product called SSS Silk

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1 Spotter?

2 A. No.

3 Q. Okay. In your operations at 712 Madison, do

4 you recall using any products that were manufactured by

5 Chem Brite?

6 A. No.

7 Q. Do you recall using in your operations any

8 product called Chem Dry?

9 A. That sounds familiar.

10 Q. What about volatile dry spotters, did you use

11 those?

12 A. No -- oh, wait a minute. Volatile dry spotter.

13 Q. Sometimes referred to as VDS?

14 A. Yes.

15 Q. Do you recall any of the names of those?

16 A. I gotta go back to Street's again. I mean, I

17 was almost totally Street products.

18 Q. Do you remember any brand name -- it was called

19 Street?

20 A. Yes.

21 Q. So to your knowledge, the volatile dry spotters

22 that you would use, they were called Street volatile dry

23 spotters?

24 A. It probably had some kind of tricky name to it,

25 but it was a volatile dry --

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1 Q. Manufactured by Street.

2 A. Yes.

3 Q. Okay.

4 A. Let's go back to Laidlaw one time.

5 Q. Yes, sir.

6 A. I believe the rust removal spotter that I used

7 was also a Laidlaw product.

8 Q. Okay. Thank you. Did you -- strike that.

9 In your operations at 712 Madison, did you use

10 any product called WetSpo?

11 A. I believe so. Sounds very familiar.

12 Q. Did you use any semi wet spotters?

13 A. No.

14 Q. Do you have an estimate as to how much volatile

15 dry spotter that you would use per year, in your

16 operations at 712?

17 A. A gallon.

18 Q. You were referring to this company called

19 Street's. Is it RR Street?

20 A. Yes.

21 Q. Okay. Did you ever use any product from

22 RR Street called a 2/1 Formula?

23 A. Two in one. Yes, that sounds familiar.

24 Q. And do you recall -- or do you have an estimate

25 as to how much of that product you would use, say, per

109

1 year in your operations?

2 A. Every one of these products that sound familiar

3 that I probably used, Doyle, I would say no more than a

4 gallon a year.

5 Q. Were they sold in gallon containers?

6 A. Yes, I had to buy a gallon.

7 Q. Right, right.

8 Did you ever in your operations at 712 Madison

9 use a product called TarGo?

10 A. The name sounds familiar, but if I had some, I

11 didn't use very much of it.

12 Q. Okay. Do you know what that product was used

13 for?

14 A. Sounds like to me it would be for removing tar.

15 But the name sounds familiar, Doyle, but I wouldn't have

16 used very much of it.

17 Q. Okay. What about a product called Spol,

18 S-p-o-l?

19 A. No.

20 Q. What about Picrin?

21 A. Yes.

22 Q. And that was an RR Street product?

23 A. Yes.

24 Q. And do you recall about how much of that you

25 would typically use in a year?

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1 A. Less than a gallon.
 2 Q. In your operations at 712 Madison, did you ever
 3 use a product called Puro?
 4 A. No.
 5 Q. What about Spray Dry?
 6 A. No.
 7 Q. SCAN, S-C-A-N?
 8 A. No.
 9 Q. And in your -- you indicated that you did have
 10 a boiler at 712 Madison, correct?
 11 A. Yes.
 12 Q. Okay. And did you ever add any Boiler Guard to
 13 that boiler?
 14 A. Yes.
 15 Q. And do you know what type of Boiler Guard that
 16 was?
 17 A. No. That could have been Laidlaw, also.
 18 Q. Do you recall how much Boiler Guard you would
 19 typically use within a year of operations at
 20 712 Madison?
 21 A. There was a prescribed amount that was added
 22 per hours of operations. And I don't recall what that
 23 was.
 24 Q. Okay.
 25 A. And you would just add this chemical right to

111

1 the water that went right through the boiler. And the
 2 boiler chemical was more substantial than the spotting
 3 chemicals, let's put it that way.
 4 I mean, if I -- I probably ordered a case of
 5 boiler chemical at a time, which contained four gallons,
 6 and I probably -- maybe twice a year I'd order a case.
 7 I don't recall.
 8 Q. That's fine.
 9 A. But there was a prescribed, you know, pattern
 10 for when you added boiler chemical to the boiler.
 11 Q. And I think you indicated earlier, and correct
 12 me if I'm wrong, that when you purchased the business,
 13 you purchased two spotting tables?
 14 A. One.
 15 Q. One. Did you ever increase that --
 16 A. No.
 17 Q. -- by an additional spotting table?
 18 A. No.
 19 Q. Now, on this spotting table, was there a place
 20 on the spotting table where the liquid would be captured
 21 from your spotting operations?
 22 A. Yes.
 23 Q. And how often was that cleaned out?
 24 A. Once a week. Generally as needed.
 25 Q. Okay. And can you describe for me the method

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1 in which you cleaned out this reservoir on the spotting
 2 table that contained liquid?
 3 A. It was -- I'm trying to think now. There was a
 4 sludge, so to speak, that would accumulate. In the
 5 beginning, that probably went in the toilet.
 6 Q. Okay. And you recall putting that -- strike
 7 that.
 8 And you recall that the sludge from the
 9 spotting table, in the beginning of your operations,
 10 that was placed in the toilet?
 11 A. I don't recall doing it, but I can't imagine
 12 where else I might have put it, in the beginning.
 13 Q. And then later on?
 14 A. It went into the container that was required by
 15 Bay Area Air Quality Control.
 16 Q. And what type of container was required by Bay
 17 Area Air Quality Control?
 18 A. It was a five-gallon sealed metal container.
 19 Q. And approximately what year do you first recall
 20 using this five-gallon sealed container?
 21 A. I want to say at approximately the same time as
 22 the dry cleaner, the new dry cleaner went in, because
 23 that's what prompted the new dry cleaner was new
 24 restrictions.
 25 So mid, mid to early '80s.

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1 Q. And other than disposal into the toilet, were
 2 there other ways of which you disposed -- prior to you
 3 getting this five-gallon sealed bucket, were there other
 4 ways in which that sludge was dis- --
 5 A. Could have gone into the garbage, also.
 6 Q. Just give me a second to finish my question.
 7 Give me one second to finish my question.
 8 A. Oh, I'm sorry.
 9 Q. That's fine. I just want to keep it clean
 10 here.
 11 MR. FARRELL: And I'll assert a belated
 12 objection as calling for speculation.
 13 BY MR. GRAHAM:
 14 Q. Who else other than yourself would know more
 15 information with respect to how these sludge from the
 16 spotting table operations, how that was disposed?
 17 During your operations.
 18 A. During my operations?
 19 Q. Yes.
 20 A. Nobody.
 21 Q. During those 30 days that Mr. Turigliatto came
 22 on board to assist you, did he have any conversations
 23 with you whereby he instructed you as to how to dispose
 24 of that sludge?
 25 A. No.

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1 Q. And you indicated that you were the only one
 2 performing spotting operations at 712 Madison?
 3 A. Yes.
 4 Q. And during your spotting operations at
 5 712 Madison, during your whole time of your operations,
 6 did you ever keep a small bottle of PCE at the spotting
 7 table for stains?
 8 A. PCE?
 9 Q. PERC?
 10 A. Oh, no, no.
 11 Q. You never kept a small bottle of PERC on the
 12 spotting table?
 13 A. (Witness shook head.)
 14 MR. GRAHAM: Okay. Perfect, it's 1 o'clock.
 15 Let's take a lunch break. We'll go off record.
 16 (Luncheon recess taken.)
 17 MR. GRAHAM: Let's go back on the record.
 18 Q. I just want to clear up one question. In
 19 looking at the record here, Mr. Duensing, I asked you
 20 whether you ever kept a small bottle of PERC on the
 21 spotting table for spotting purposes while you operated
 22 at 712 Madison.
 23 A. No.
 24 Q. Before we took the lunch break we were talking
 25 about some of the spotting operations and some of the

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1 chemicals or products that were used in the spotting
 2 operations.
 3 Do you recall that?
 4 A. Yes.
 5 Q. Okay. In the spotting operations conducted
 6 during the time that you operated the business at
 7 712 Madison, did you use any spotting brushes for
 8 purposes of spotting?
 9 A. Yes.
 10 Q. Okay. And during the time that you operated at
 11 712 Madison Street, how were those spotting brushes
 12 cleaned?
 13 A. At the spotting board itself. The spotting
 14 board includes a steam gun, I guess you could call it a
 15 mini power washer, shoots out a pressurized wand of
 16 steam. And that's what the brushes were cleaned with.
 17 Q. And where were those brushes stored when they
 18 were not in use?
 19 A. On the spotting board itself.
 20 Q. And when it came time -- well, strike that.
 21 There would come a time where those spotting
 22 brushes would need to be replaced, correct?
 23 A. I don't know that I ever replaced a spotting
 24 brush.
 25 Q. Okay.

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1 A. The bone -- there was also an item called a
 2 bone which was actual bone, I guess, that was an eighth
 3 of an inch thick, round on one end, pointed on the
 4 other, which was a device that was used for picking at
 5 spots or scraping of spots.
 6 I did -- and obviously over a period of time
 7 that bone would wear. I replaced that one time. But I
 8 don't ever recall replacing spotting brushes.
 9 Q. And when -- how did you dispose of the bone?
 10 A. The bone?
 11 Q. Yes.
 12 A. Garbage can.
 13 Q. Okay. Did you use any cheese cloth in your
 14 operations at the spotting table?
 15 A. No.
 16 Q. Never used cheese cloth?
 17 A. No.
 18 Q. All right. Now, I recall from your previous
 19 testimony, and correct me if I'm wrong, that somewhere
 20 around the mid '80s you replaced some dry cleaning
 21 equipment that you had purchased from Mr. Turigliatto.
 22 A. Correct.
 23 Q. That was sometime in the mid '80s, right?
 24 Again, I'm just looking for an estimate.
 25 A. Yeah.

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1 Q. Mr. Duensing, what type of machines did you buy
 2 in addition to -- well, strike that.
 3 I presume in the mid '80s you replaced the
 4 transfer equipment with a dry-to-dry system --
 5 A. Yes.
 6 Q. -- is that correct?
 7 A. Yes.
 8 Q. That's one of the changes that you made in the
 9 mid '80s to the equipment?
 10 A. Correct.
 11 Q. Did you purchase any other additional equipment
 12 at that time?
 13 A. On or about the same time as when I purchased
 14 the sniffer.
 15 Q. Did you also purchase -- strike that.
 16 In the mid '80s when you purchased the
 17 dry-to-dry system and the sniffer, did you also purchase
 18 a still?
 19 A. No.
 20 Q. What about a muck cooker, did you ever purchase
 21 a muck cooker?
 22 A. No.
 23 Q. So during your operations at 712 Madison, there
 24 was never a muck cooker that was used in your dry
 25 cleaning operations?

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1 A. No.
 2 Q. Okay.
 3 A. Now, again, the dry cleaning machine that I
 4 purchased had a still built in.
 5 Q. Right.
 6 A. And I never had a separate piece of equipment
 7 that was called a muck cooker or --
 8 Q. Do you know what a muck cooker is?
 9 A. I can only assume that the function is the same
 10 as the still that's on the dry cleaning machine. It
 11 cooks down the solvent to a muck.
 12 You -- you distill the solvents, remove all the
 13 impurities, and clean solvent goes back in the machine,
 14 and you're left with a residue.
 15 Q. In the mid '80s, do you know what type of
 16 dry-to-dry unit you purchased?
 17 A. I do not recall the name of the machine that I
 18 bought.
 19 Q. Do you recall who manufactured it?
 20 A. It was foreign.
 21 Q. It was foreign?
 22 A. Foreign. German or --
 23 Q. Was it a Bowe?
 24 A. No.
 25 Q. Permac?

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1 A. Permac sounds familiar. It could very easily
 2 have been a Permac.
 3 Q. It was a German unit, you recall?
 4 A. I -- it had foreign languages on it.
 5 Q. On the backplate?
 6 A. Yeah.
 7 Q. Do you recall as you sit here today what type
 8 of language that was?
 9 A. No. I thought it was German.
 10 Q. It didn't look Korean or --
 11 A. No, no, no.
 12 Q. And you also indicated that you had purchased a
 13 sniffer.
 14 A. Correct.
 15 Q. Okay. Is that also referred to as a carbon
 16 adsorber?
 17 A. Yes.
 18 Q. Do you know what type of -- would you prefer
 19 that we call it a sniffer or carbon adsorber?
 20 A. Sniffer.
 21 Q. I just want to stay consistent. Okay.
 22 Do you recall what type of a -- strike that.
 23 Do you recall who manufactured the sniffer that
 24 you purchased in the mid '80s?
 25 A. No, I don't.

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1 Q. Other than the dry-to-dry system, the sniffer,
 2 and the still that was actually part of the dry-to-dry
 3 unit, is there any other equipment, dry cleaning
 4 equipment, that you purchased in the time that you
 5 operated at 712 Madison?
 6 A. No.
 7 Q. You didn't have a separate reclaimer for that
 8 dry-to-dry?
 9 A. I never removed the old reclaimer, only because
 10 I thought in an emergency if anything ever happened to
 11 this used dry cleaning machine that I had, I could
 12 always revert to the old reclaimer to dry garments.
 13 Never did -- I don't recall ever using it.
 14 Q. The old reclaimer?
 15 A. The old reclaimer, but I never took it out,
 16 just as a backup, plan B.
 17 Q. Right. But it wasn't piped or plumbed to that
 18 dry-to-dry system?
 19 A. No.
 20 Q. Okay. That's what I was trying to get to.
 21 From whom did you purchase the used dry-to-dry
 22 equipment?
 23 A. There was a dry cleaner down West Texas Avenue
 24 that went out of business.
 25 Q. In Fairfield?

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1 A. In Fairfield. The name of the cleaners was
 2 Bunny's, and I purchased their dry cleaning machine.
 3 MR. SHAMIYEH: Excuse me, I didn't get that
 4 name, please.
 5 THE WITNESS: Bunny's, B-u-n-n-y, apostrophe s.
 6 BY MR. GRAHAM:
 7 Q. And -- I'm sorry, go ahead.
 8 A. I do not recall the owner's name that owned it,
 9 but that was the name of the cleaners, anyway.
 10 Q. And did you also purchase the sniffer from
 11 Bunny's Cleaners?
 12 A. No. The sniffer I got from a gentleman that
 13 did periodic maintenance for me.
 14 Q. And what is that gentleman's name?
 15 A. I'm not sure I still have the card. I
 16 submitted the card to Mr. Farrell -- oh, here it is.
 17 His name is Ernest Edgar, E-d-g-a-r.
 18 Q. Okay. And do you have a contact number for
 19 Mr. Edgar?
 20 A. I'm not sure this is still good, but I have
 21 (916)427-6858. The name of his company is V&E Service
 22 Company.
 23 Q. That's V as in Victor --
 24 A. V as in Victor; E as in --
 25 Q. Edward?

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1 A. Elephant.
 2 Q. Okay.
 3 A. This gentleman, during my tenure at
 4 712 Madison, did periodic maintenance and repairs and so
 5 forth for me.
 6 Q. Okay. Now, this dry-to-dry unit that you
 7 purchased from Bunny's Cleaners in the mid 1980s, when
 8 that was installed at 712 Madison, was that bolted to
 9 the floor?
 10 A. Yes.
 11 Q. Did you place any type of barrier around that
 12 machine?
 13 MR. FARRELL: I'll object as vague and
 14 ambiguous.
 15 BY MR. GRAHAM:
 16 Q. Did you have any sort of containment around the
 17 machine that the machine sat into?
 18 A. I want to say yes, only because I think it was
 19 mandatory from Bay Area Air Quality Control at that time
 20 that there be containment. And when I changed
 21 equipment, it fell under those guidelines.
 22 But to sit here today and tell you, yes, there
 23 was a containment, I can't swear to it.
 24 Q. And, again, Mr. Duensing, we don't want you to
 25 guess at anything. So if you don't know, just --

123

1 A. I don't know.
 2 Q. Okay. Now, this dry-to-dry unit that you
 3 purchased in the mid 1980s, was that plumbed to the
 4 sewer?
 5 A. No.
 6 Q. And we spoke a little bit earlier about
 7 wastewater that was generated through the process of
 8 reclaiming.
 9 Is it your understanding that there was also
 10 wastewater that resulted in the dry cleaning processes,
 11 the same way it did from a transfer unit, the same
 12 process with a dry-to-dry, except it was just on one
 13 unit?
 14 A. I don't -- I don't recall ever having
 15 wastewater from the dry cleaning machine. If I ever --
 16 pardon me. If I ever got excessive moisture, it was
 17 time to distill the solvent, and you could distill the
 18 solvent and remove the moisture.
 19 Q. Right. And what I'm speaking about,
 20 Mr. Duensing, is as an operation of the dry-to-dry,
 21 there was a process whereby that solvent would be
 22 reclaimed, kind of in the same way we described earlier
 23 this morning with respect to a transfer machine, whereby
 24 there would be a heated coil and a cooling coil.
 25 And the vapors would be heated and then

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1 condensed. The PCE would go back into the tank, and
 2 then we'd be left with a wastewater stream, or processed
 3 water that would result in that process.
 4 Do you recall that?
 5 A. No. I don't -- the still, I don't ever recall
 6 having to take water out of the still at all. I mean,
 7 it heated up the solvent, and the moisture evaporated.
 8 I don't ever recall taking wastewater -- I don't ever
 9 recall taking wastewater out of the reclaimer.
 10 Q. Right. And it wouldn't be a process where you
 11 would take water out of the reclaimer.
 12 A. It would be piped somewhere.
 13 Q. Right. Have you ever heard of a water
 14 separator?
 15 A. Yes.
 16 Q. Okay. And what is the function of a water
 17 separator?
 18 A. Separates water from the solvent.
 19 Q. Okay. And is it your understanding that on a
 20 dry-to-dry unit you would have a water separator on that
 21 unit?
 22 A. And obviously, there would be a place where the
 23 water -- okay. I believe that went into my sink into
 24 the bathroom.
 25 Q. So the dry-to-dry unit was located close enough

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1 to the bathroom whereby the water from the water
 2 separator could be easily discharged into that sink into
 3 the bathroom?
 4 A. (Witness nodded head.) Yes.
 5 MR. GRAHAM: Can we go off the record just for
 6 a second?
 7 (Off the record.)
 8 MR. GRAHAM: All right. Back on.
 9 Q. Mr. Duensing, what I'd like you to do, I'm
 10 going to hand to you another copy of the diagram of the
 11 interior of 712 Madison that was Bates RT 19.
 12 I'll hand this to you, and what I'd like you to
 13 do, we're going to go kind of through the same routine
 14 we did last time.
 15 Well, let me first ask you, when -- after you
 16 purchased the dry-to-dry unit, did it remain in the same
 17 location throughout your tenancy at 712 Madison?
 18 A. Yes.
 19 Q. Okay. And the sniffer that you purchased, did
 20 that remain in the same location?
 21 A. Yes.
 22 Q. Okay. What I would like you to do for me on
 23 this picture, is if you would identify approximately the
 24 location where that used dry-to-dry machine was placed
 25 after you purchased it?

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1 A. (Witness complied.)
 2 Q. Then if you could -- thank you.
 3 And then the old reclaimer that you purchased
 4 from Mr. Turigliatto, but that you still kept at the
 5 property, could you identify the location of where that
 6 was.
 7 A. It didn't move.
 8 Q. Oh, okay. So it was in the same location?
 9 A. Yes.
 10 Q. And then the carbon adsorber, or the sniffer
 11 you purchased, could you identify the location as to
 12 where that was at 712 Madison?
 13 A. (Witness complied.)
 14 Do you want me to put fluorocarbon adsorber?
 15 Q. Sniffer is fine.
 16 And then the boiler remained in the same spot
 17 as it was after you had purchased it from
 18 Mr. Turigliatto?
 19 A. Correct.
 20 Q. Okay. And --
 21 A. There was a boiler change.
 22 Q. Okay.
 23 A. But it -- I had to get a new boiler, but it
 24 remained in the same position.
 25 Q. Okay. Terrific.

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1 Now, if you would just mark this in the same
 2 fashion, kind of machinery at location at time of your
 3 operations.
 4 A. Updated?
 5 Q. Huh?
 6 A. Updated machinery?
 7 Q. Oh, no, no, no, just -- I'm sorry, if you'd
 8 just identify it as machinery at location during your
 9 operation, so we can differentiate between that and
 10 Mr. Turigliatto's.
 11 A. (Witness complied.)
 12 MS. McADAM: That's all subsequent to the
 13 equipment change, correct?
 14 MR. GRAHAM: This was, yes.
 15 MS. McADAM: Okay.
 16 MR. FARRELL: Is this going to be 6?
 17 MR. GRAHAM: 7.
 18 Q. All right. One more question. With respect to
 19 the restroom that was here, was that an enclosed space?
 20 Were there walls?
 21 A. Yes.
 22 Q. Okay.
 23 MR. GRAHAM: Would you mark this as 7?
 24 (Whereupon Exhibit No. 7 was then marked for
 25 identification.)

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1 BY MR. GRAHAM:
 2 Q. Let me ask you, Mr. Duensing, the -- and I'll
 3 just refer to it as the water separator water; is that
 4 fine? Okay.
 5 The water that would come out of the water
 6 separator, did you ever use that separator water as a
 7 prespotting agent?
 8 A. No.
 9 Q. No. Do you know whether Mr. Turigliatto had
 10 ever used separator water as a prespotting agent?
 11 A. I don't know.
 12 Q. In the 30 days that Mr. Turigliatto was there
 13 supervising the transition, did you ever have any
 14 conversations with him with respect to the use of
 15 separator water as a spotting agent?
 16 A. No.
 17 Q. The machines that were in there that you
 18 purchased from Mr. Turigliatto, who removed those
 19 machines prior to the new machines coming in?
 20 A. The gentleman that I spoke of earlier, Ernest
 21 Edgar.
 22 Q. Okay. And was there any leftover solvent from
 23 those machines when he moved the old transfer machines?
 24 A. There would have had to have been some. We
 25 pumped it. Perchloroethylene was about 6.50, \$7 a

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1 gallon, as I recall.
 2 So we did our darnedest to get everything out
 3 of that old machine. We just used an electric pump, but
 4 I can imagine there was something left in it when it
 5 left the facility.
 6 Q. Now, were you actually hands-on involved in
 7 removing the PERC from those old transfer units?
 8 A. Yes.
 9 Q. Okay. And that was done just with a small pump
 10 you say?
 11 A. Yep.
 12 Q. Okay. And placed into what?
 13 A. Hose to hose. I mean, hosed into the old
 14 machine, hosed into the new machine.
 15 Q. Oh, okay. Okay.
 16 The dry-to-dry machine that you purchased, do
 17 you know whether that was a manual or whether that was
 18 an automatic machine?
 19 A. A little bit of both. It was old enough there
 20 were automatic features on it that did not work.
 21 Q. Okay.
 22 A. And it had to be manually operated.
 23 Q. And when you first purchased that dry-to-dry
 24 unit, did you purchase the carbon adsorber at the same
 25 time?

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1 A. I'd have to say yes. It was just a -- if there
 2 was any space between the two purchases, it was not
 3 significant.
 4 Q. Okay. Do you know whether that dry-to-dry
 5 machine was a vented machine or non-vented machine?
 6 A. Non-vented.
 7 Q. It didn't have a refrigerator condenser, did
 8 it?
 9 A. Yes, it did have a refrigerator condenser, but
 10 I don't believe it was functioning.
 11 Q. Okay. And that dry-to-dry unit had two tanks
 12 on it, correct, two --
 13 A. Correct.
 14 Q. -- PCE tanks?
 15 A. Correct.
 16 Q. Do you know the capacity of each of those
 17 tanks?
 18 A. I don't recall.
 19 Q. The old transfer machines that you used prior
 20 to your purchase of the dry-to-dry units, when PCE or
 21 PERC was delivered to 712 Madison, can you just kind of
 22 walk me through the processes of how the PERC was
 23 delivered and how it was -- once on site, how it was
 24 taken from wherever it was delivered, whether 55-gallon
 25 tanks or -- 55-gallon drums or tanker truck, how that

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1 PCE or PERC got into the transfer unit?
 2 A. The vendor pulled up to the back door. I want
 3 to say he had 55-gallon drums on his vehicle. And there
 4 was a hose taken from that tank and ran straight into
 5 the machine, and like a gasoline nozzle was put right
 6 down into my machine. And he filled it up then.
 7 I can recall him having to switch containers.
 8 If I was going to take more than 30 or 40 gallons, he
 9 wanted to know because he would put it on a full
 10 55-gallon drum as opposed to one that was partially
 11 empty so we didn't have to switch.
 12 Q. And, now, these were ways that deliveries of
 13 PERC were made to 712 Madison when you first started
 14 operating?
 15 A. Yes.
 16 Q. Okay. And did it continue that way throughout
 17 the entire time that you were there?
 18 A. Yes.
 19 Q. Okay. It was always delivered through the
 20 back?
 21 A. Yes.
 22 Q. Okay. And it was always delivered --
 23 A. I take that back. One time, the particular
 24 truck that normally did the deliveries was unavailable,
 25 and they had a tractor/trailer rig.

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1 And we had to run a hose in the front door all
 2 the way -- he had to park -- he couldn't get into the
 3 back of the shop. He had to park out on the main
 4 street, and we ran a hose all the way through the
 5 building to the machine.
 6 Q. Okay. I may have asked you this before,
 7 forgive me if I did. Did you ever -- during your tenure
 8 at 712 Madison, did you ever store any extra PERC on the
 9 premises?
 10 A. No.
 11 Q. Okay. So other than the one-time delivery
 12 through the front door when the truck couldn't fit into
 13 the back alley, other than that incident, all the other
 14 deliveries of PCE to 712 Madison occurred through the
 15 back door.
 16 A. Correct.
 17 Q. Do you recall in your tenure at 712 Madison
 18 whereby there were any accidents that resulted in any
 19 releases of PERC during the delivery of PERC to
 20 712 Madison?
 21 A. Nothing that was reported to me. I didn't
 22 stand by and watch while it was unloaded. Most of the
 23 time I was busy either pressing or waiting on the
 24 counter. I -- I was not witness to one.
 25 Q. Did you ever hear of one?

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1 A. I'm sorry?
 2 Q. Did you ever hear of one?
 3 A. No.
 4 Q. Did you ever see any documents that would have
 5 indicated that such a spill or accident had happened in
 6 the delivery of PERC to 712 Madison?
 7 A. No. There was -- pardon me. There was, I
 8 recall, a conversation one time. I felt there was a
 9 difference in what I was billed for than what I got, but
 10 that was almost two or three weeks after the delivery
 11 when I got the bill.
 12 I was billed for what I thought was -- and I --
 13 ten or 15 gallons more than what I actually got. Yes, I
 14 received a bill upon his departure, I signed it, never
 15 paid any attention. I knew I had -- I had a level of
 16 solvent in my machine, but I didn't -- I didn't think I
 17 got that much.
 18 But that's as far as it went. I paid the bill,
 19 and we went forward from there.
 20 Q. As you sit here today, do you have any reason
 21 to believe that there were any accidents --
 22 accidents, strike that.
 23 As you sit here today, Mr. Duensing, do you
 24 have any reason to believe that there were any accidents
 25 that occurred that resulted in the release of PERC at

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1 712 Madison through the delivery process?
 2 A. No.
 3 Q. Can you name for me any of the vendors from
 4 whom you purchased PERC for your operations at
 5 712 Madison?
 6 A. Echo Sales, Goss-Jewett. I believe those are
 7 the only two I ever got solvent from.
 8 Q. Did you ever use any recycled PCE in your
 9 operations at 712?
 10 A. No.
 11 Q. Do you know if Mr. Turigliatto ever used any
 12 recycled PCE in his operations at 712 Madison?
 13 A. No.
 14 Q. You don't know, or no, he didn't?
 15 A. I don't know.
 16 Q. Okay.
 17 A. Just a comment of my own. I'm not sure back in
 18 that time that recycled perchloroethylene was even
 19 available. I'm not sure anybody had even invented it
 20 yet.
 21 Q. Are you speaking -- when you say "that time,"
 22 are you speaking during the time of Mr. Turigliatto's
 23 operation?
 24 A. That's correct.
 25 Q. Okay.

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1 A. I heard -- I heard about recycled
 2 perchloroethylene, but I didn't want to deal with it.
 3 Q. Okay. Why not?
 4 A. Just had a -- had a connotation that didn't
 5 agree with me.
 6 Q. On your dry-to-dry unit, when the PCE
 7 deliveries would come in through the back door, you said
 8 they ran a hose from the 55-gallon drum right into the
 9 machine; is that correct?
 10 A. Yes.
 11 Q. Okay. Could you be -- thank you.
 12 Could be operating that machine at the same
 13 time that deliveries were taking place, or would you
 14 have to shut your dry cleaning machine down?
 15 A. It could be operating, yes.
 16 Q. Okay. And at what location of the machine did
 17 they insert the hose to deliver PERC into the machine,
 18 on the dry-to-dry unit -- I'm sorry, on the trans- -- on
 19 the dry to dry unit?
 20 A. On the dry-to-dry unit?
 21 Q. Yes, sir.
 22 A. There was a cap that was un- -- I'm trying to
 23 recall. The two different machines were entirely
 24 different.
 25 On the dry-to-dry machine, there was a cap that

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1 was removed, and the hose was inserted right in that
 2 hole, which obviously went right into the tank.
 3 Q. Through the button trap?
 4 A. No. That was on the transfer unit.
 5 Q. Okay.
 6 A. The transfer unit, we loaded PERC through the
 7 button trap.
 8 Q. Okay. So this was -- I'm trying to understand
 9 the cap.
 10 A. Like a gas cap on top of the tank, on the side,
 11 on the side of the machine.
 12 Q. Okay. Because it couldn't be on top of the
 13 tank. I mean the unit was on top of the tank, correct?
 14 A. Well, there was -- as I recall there was an
 15 opening where you could get to this cap, or it may have
 16 even been around on the back side, but there was --
 17 there was a cap that was taken off to load PERC.
 18 Q. Okay. And you don't recall any accidents
 19 during the delivery of PERC where the hose would come
 20 uncoupled from the truck or the drum or anything that
 21 resulted in an accidental releases of PERC?
 22 A. No.
 23 Q. Okay. So you indicated that on your dry-to-dry
 24 machine that you actually -- that the still was actually
 25 built into that unit --

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1 A. Yes.
 2 Q. -- is that correct?
 3 A. Yes.
 4 Q. Okay. And how often during your operations
 5 with the dry-to-dry unit, how often would you estimate
 6 that solvent was distilled?
 7 A. With the dry-to-dry unit, it wasn't distilled
 8 that often, only because the operation of that machine
 9 ate up a lot of solvent, and I ended up having to buy
 10 solvent as opposed to distill it.
 11 I would go through the solvent before I had to
 12 distill it, with that machine.
 13 Q. And with respect to the transfer unit, how
 14 often would you say that you had to distill your solvent
 15 with that machine?
 16 A. Obviously, it depended on the poundage that
 17 went through the machine, but once a month.
 18 Q. Was there a general rule of thumb as to how
 19 many gallons used or how many loads or pounds?
 20 A. Coloration.
 21 Q. Coloration. If it got milky white, you'd
 22 distill?
 23 A. Oh, no. Milky white, you got trouble.
 24 Q. What coloration --
 25 A. When -- when it wasn't a good crisp golden

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1 color, when it started to fade in brightness and
 2 clarity, you could tell that you had, you know --
 3 redeposition isn't the word, but you had -- you had
 4 impurities, and you needed to distill it.
 5 Q. With the transfer unit, did you have any method
 6 to check the fatty acid content of that solvent?
 7 A. No.
 8 Q. How about with the dry-to-dry?
 9 A. (Witness shook head.)
 10 Q. You didn't have any solvent test kits?
 11 A. I probably did. I didn't use them.
 12 Q. Okay. Now, with the transfer unit, did you
 13 have to manually remove the solvent from the unit in
 14 order to distill it?
 15 A. No.
 16 Q. I guess your answer would be the same for the
 17 dry-to-dry?
 18 A. Correct.
 19 Q. It was part of the unit, correct?
 20 A. (Witness nodded head). You could pump the
 21 solvent right into the still by opening a series of
 22 valves.
 23 Q. This was on the transfer or on the --
 24 A. Either one.
 25 Q. Okay. And with the transfer unit how often

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1 would you say -- well, strike that.
 2 Are you familiar with the process whereby you
 3 rake out the still bottoms?
 4 A. Break out --
 5 Q. Rake out the still bottoms?
 6 A. Oh, no.
 7 Q. You've never heard of that?
 8 A. Oh, I've heard of it.
 9 Q. Oh, okay. But you never did that?
 10 A. No.
 11 Q. In your entire operation?
 12 A. Correct.
 13 Q. Okay. Was there any still residue that was
 14 built up due to the distillation process?
 15 A. Yes, there was.
 16 Let's go back to your rake out the still
 17 bottom. The term is unfamiliar, but obviously, the
 18 residue that was left in the still when you got finished
 19 with the distillation process had to be removed. If
 20 that's what you're terming raking out the still, then
 21 yes, I did do that.
 22 Q. Okay. And that was done both on the dry-to-dry
 23 and the transfer machine?
 24 A. Yes.
 25 Q. Okay. And with the transfer machine, how were

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1 those still bottoms disposed of?
 2 A. Depending on the amount and the viscosity,
 3 either a garbage can or toilet.
 4 Q. Okay. And what about with respect to the
 5 dry-to-dry?
 6 A. I don't remember honestly, because, like I say,
 7 the operation of that machine was so hit and miss, I was
 8 forced into buying it.
 9 I got an inferior product, but for the money
 10 that I put out on it, I had to have it. I never was
 11 happy with the operation because it didn't operate
 12 correctly.
 13 I might have distilled twice, Doyle, and
 14 honestly, I don't remember if there was residue in the
 15 bottom of that still or not.
 16 But if -- I would have disposed of it the same
 17 way.
 18 Q. Okay. You made the statement, you said you
 19 never were -- you never were happy with the operation
 20 because it didn't operate correctly, your used
 21 dry-to-dry?
 22 A. Right. It didn't operate correctly from the
 23 standpoint that there were automatic features on it that
 24 didn't work, so there was time spent standing by the
 25 machine to go to the next formula, or go to the next

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1 stage of a formula as opposed to being able to go over
 2 and --
 3 Q. Gotcha.
 4 A. -- do my work and let it run its course.
 5 Q. Chat up the counter girl?
 6 A. Pardon me?
 7 Q. Nothing.
 8 A. If I might add?
 9 Q. Yes, sir.
 10 A. That was a -- I believe that was a 50-pound
 11 machine that I bought. A brand new 50-pound machine at
 12 that time was going for 75 or \$80,000. I did not have
 13 75 or \$80,000. I spent 5,000 on that one.
 14 Q. Okay.
 15 A. At that point in time that was the avenue I
 16 took.
 17 Q. I gotcha.
 18 Did you ever have any conversations with
 19 Mr. Turigliatto whereby he informed you as to how he
 20 disposed of his still bottoms?
 21 A. I'm pretty sure that's why I started disposing
 22 of them the way I did, is because that's the way I was
 23 instructed.
 24 Q. Is it your understanding that on the still, on
 25 the dry-to-dry machine, on the still that was

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1 encompassed within the unit, that that also had a water
 2 separator on it?
 3 A. I don't know.
 4 Q. Okay. Did you ever have any boil-overs with
 5 any of the stills, either with the transfer unit or the
 6 dry-to-dry?
 7 A. Transfer, yes.
 8 Q. Transfer. And you indicated that during your
 9 operation at 712 Madison that you never had a muck
 10 cooker?
 11 A. No.
 12 Q. Now I'd like to talk about the transfer unit,
 13 specifically with regard to the filters that were used
 14 on that transfer unit.
 15 You purchased those filters from, I presume,
 16 one of the three entities that you had given us before?
 17 A. Yes.
 18 Q. Goss-Jewett, Echo. And what was the third one?
 19 A. Work Room Supply.
 20 Q. Work Room.
 21 And on the transfer unit you indicated that
 22 when the pressure got too great, that you knew that it
 23 was time to change the filters, correct?
 24 A. Yes.
 25 Q. Okay. Did you ever put the -- well, strike

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1 that.
 2 What type of filters were used in this transfer
 3 unit?
 4 A. The transfer unit had three paper type filters
 5 and one carbon core filter.
 6 Q. Now, the paper filters, when the pressure got
 7 too high, you would merely replace those filters, the
 8 paper filters?
 9 A. Yes.
 10 Q. Okay. And the carbon core, you replaced that,
 11 also?
 12 A. Yes.
 13 Q. Okay. There was no recycling or any process
 14 whereby you could get some more life out of those
 15 filters?
 16 A. No.
 17 Q. Okay. And then you indicated earlier in your
 18 testimony that you would drain the PCE out of the unit
 19 so that those filters were dry?
 20 A. The night before.
 21 Q. The night before.
 22 And then the paper filters, those would just go
 23 in the trash can?
 24 A. Yes.
 25 Q. Okay. And what about the carbon core?

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1 A. Same thing.
 2 Q. Same thing.
 3 Were those filters warm when you pulled them
 4 out?
 5 A. No.
 6 Q. In the transfer unit, did you ever use filter
 7 powder in that unit?
 8 A. No.
 9 Q. You didn't at all?
 10 A. No, never.
 11 Q. Really?
 12 A. Yep.
 13 Q. Why not?
 14 A. Filter powder was used in a different
 15 configuration than what I had.
 16 Q. Okay. Did you ever hear of a product called
 17 Magnesol?
 18 A. No.
 19 Q. High Flow?
 20 A. High Flow, yes. I want to say that's the brand
 21 of the filters that I got.
 22 Q. So you never prepared any -- I'm sorry, you
 23 looked like you wanted to say something. Oh.
 24 So you never prepared any filter powder and put
 25 that into the filter unit?

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1 A. Never.
 2 Q. Okay. Now, these three paper filters, they
 3 were in a unit that was connected to the transfer
 4 machine; is that correct?
 5 A. Correct.
 6 Q. It was kind of almost a standalone unit?
 7 A. Yes.
 8 Q. Okay.
 9 A. Well, it was attached to the machine, but
 10 obviously, it was on a -- I wouldn't classify it as
 11 standalone.
 12 Q. Maybe that wasn't the proper term. But it
 13 was -- it wasn't built in as we were speaking of, let's
 14 say, the stills in the new dry-to-dry?
 15 A. Correct.
 16 Q. Okay.
 17 A. It had to be accessible, let's put it that way,
 18 so it was up a little bit higher or over to one side or
 19 whatever so you could access the cartridges.
 20 Q. Kind of a rectangular, tall unit?
 21 A. Yes.
 22 Q. Was there ever -- did you ever, in an attempt
 23 to reclaim solvent from the filters, throw those filters
 24 into the reclaiming?
 25 A. Please repeat that.

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1 Q. Sure.

2 In an attempt to reclaim solvent off of those

3 used filters, did you ever take the filters and place

4 them into the reclaimer, run a cycle to reclaim --

5 A. Never.

6 Q. And I think your testimony was that you don't

7 ever recall back-washing that filter unit?

8 A. Never did.

9 Q. Okay. Are you familiar with a product called

10 Darco?

11 A. Yes.

12 Q. Okay. What is Darco used for?

13 A. If I'm not mistaken, Darco was the carbon that

14 was inside of the carbon filter. That was the product

15 that was in that carbon filter.

16 Q. The filter unit that we've been discussing, is

17 it your understanding that there was a sludge drawer

18 underneath there?

19 A. No.

20 Q. No, there was not?

21 A. No.

22 I want to change my count.

23 Q. Yes.

24 A. I believe it was four paper, because the

25 cartridges -- each cartridge contained two filters, and

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1 then there was a single for the carbon.

2 Q. Okay. And the carbon went into the same filter

3 unit?

4 A. Went in where?

5 Q. To the same filter unit that the papers --

6 A. Same unit, yes, but it had a cartridge all to

7 its own.

8 Q. Mr. Duensing, you didn't have a simple washer

9 and dryer at your location, did you?

10 A. No.

11 Q. Now I want to talk about the sniffer that you

12 spoke of earlier that you purchased. What is the

13 purpose of a sniffer?

14 A. Hybrid filter and -- honestly, that's all I

15 know. I knew I had to have it. Had to have it to

16 continue operating. And had it installed and was told

17 how to maintain it, and that's all I know.

18 Q. And did Mr. Ernest Edgar or Edgar Ernest

19 install that unit for you?

20 A. Yes. In fact, he was the one that negotiated

21 the deal for that. He knew someone that had one.

22 Q. Now, that sniffer, was that hooked up to the

23 cleaning machine or the reclaimer?

24 A. Dry cleaning machine. The reclaimer is out of

25 the picture now.

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1 Q. I beg your pardon.

2 Was there a lint bag on that sniffer?

3 A. On the sniffer?

4 Q. Yes.

5 A. No.

6 Q. Do you know how many pounds of carbon that your

7 sniffer held?

8 A. No. I know it had two of the carbon core

9 filters in it, but as far as poundage, no.

10 Q. It had two carbon core filters?

11 A. (Witness nodded head.)

12 Q. Are you familiar with a process called

13 stripping or desorbing that would apply to sniffers?

14 A. No.

15 Q. So I take it you never desorbed or stripped

16 your sniffer?

17 A. No.

18 Q. You don't know -- okay?

19 A. No.

20 Q. Did you ever -- let's see if I can -- did you

21 ever hit the carbon core filters with steam to get some

22 of the PERC off of there?

23 A. No.

24 Q. "No"?

25 And was there a water separator connected to

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1 this sniffer?

2 A. No.

3 Q. There was not?

4 A. No.

5 Q. Did you have a condenser on the carbon --

6 strike that.

7 Did you have a condenser on the sniffer?

8 A. I don't know.

9 Q. Okay. Did you -- during the time that you

10 operated with the sniffer in place, did you ever employ

11 any methods whereby you would test the exhaust of the

12 sniffer?

13 A. One more time.

14 Q. Sure.

15 During the time that you used the sniffer at

16 712 Madison in your PERC dry cleaning operations, did

17 you ever test the exhaust on the carbon adsorber, on the

18 sniffer?

19 A. No. There were, I believe, two times EPA came

20 in and tested my facility for exhaust or whatever. And

21 honestly, I don't recall the results.

22 I was never fined or anything, but I know -- I

23 know there were tests done within the facility after the

24 dry -- after the dry-to-dry machine was put in because

25 they were not going to issue a new license until that

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1 was installed.
 2 So once it was installed, then they did testing
 3 to make sure it was operating to the standards that need
 4 be at the time.
 5 Q. And when you say "that," are you speaking of
 6 the sniffer?
 7 A. No -- well, the whole system.
 8 Q. Okay.
 9 A. The sniffer and the dry cleaner. Both of those
 10 pieces of equipment were mandated by Bay Area -- Bay
 11 Area Quality -- Air Quality Control, or they were not
 12 going to issue my license.
 13 Q. But you don't recall any instances whereby you,
 14 yourself, would be testing the sniffer --
 15 A. No.
 16 Q. -- for any of the exhaust?
 17 A. I had no equipment to test.
 18 Q. Okay. In your operations at 712 Madison, did
 19 you have a photo ionization detector?
 20 A. No.
 21 Q. I take it you had an air compressor at
 22 712 Madison?
 23 A. Yes.
 24 Q. Okay. And where was that air compressor kept?
 25 A. By the back door.

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1 Q. Okay. If we're looking at Exhibit -- can you
 2 identify that exhibit for me?
 3 The number's in the bottom right-hand corner,
 4 Mr. Duensing.
 5 A. Upper left-hand corner --
 6 Q. Mr. Duensing, could you identify the exhibit
 7 you're looking at?
 8 A. Oh, I'm sorry. It's RT 19, Exhibit 7.
 9 Q. Thank you. Go ahead.
 10 A. The upper left-hand corner --
 11 Q. Don't mark on that one, please.
 12 A. -- close enough to the door -- close enough to
 13 the door where it would still open and close, but that
 14 far back on the wall.
 15 Q. Okay.
 16 MR. GRAHAM: Let's go off the record for a
 17 second.
 18 (Off the record.)
 19 MR. GRAHAM: Let's go back on.
 20 (Whereupon Exhibit No. 8 was then marked for
 21 identification.)
 22 BY MR. GRAHAM:
 23 Q. Mr. Duensing, we're showing to you what's been
 24 marked as Exhibit No. 8. This is kind of a -- well, let
 25 me ask you first.

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1 Do you recognize this picture?
 2 A. Yes.
 3 Q. Okay. And what is this?
 4 A. It's the back door of 712 Madison.
 5 Q. All right. Now, on Exhibit 8, do you see on
 6 the left-hand side of the door, if we go one, two bricks
 7 up, kind of a patch job there?
 8 Do you see that?
 9 A. Yes.
 10 Q. Okay. In your dry cleaning operations at
 11 712 Madison, was there any sort of exhaust or pipe or
 12 anything that went out at that location that we're
 13 looking at in Exhibit No. 8?
 14 A. No.
 15 Q. Do you know what that hole is there for?
 16 A. No.
 17 Q. In your operations at 712 Madison, had you ever
 18 noticed that patch job --
 19 A. Yes.
 20 Q. -- at that location?
 21 Oh, you had?
 22 A. Yes.
 23 Q. Okay. And was that there at the time that you
 24 purchased the business from Mr. Turigliatto?
 25 A. I believe so.

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1 Q. Okay. That's all I have for that one then.
 2 (Whereupon Exhibit No. 9 was then marked for
 3 identification.)
 4 BY MR. GRAHAM:
 5 Q. Mr. Duensing, I've handed to you what's been
 6 marked as Exhibit No. 9.
 7 Do you recognize this photo?
 8 A. Yes.
 9 Q. What is this?
 10 A. It's the back door of 712 Madison.
 11 Q. Right. Do you see the hole -- or not the hole,
 12 but the discoloration in the wall to the right-hand side
 13 of the upper part of the door there? We spoke about
 14 that earlier.
 15 A. Above the door or to the right?
 16 Q. To the right of the door. See the gray
 17 discoloration?
 18 A. I'm not sure that I know what you're referring
 19 to.
 20 Q. If you look -- see the first meter box to the
 21 right of the door?
 22 A. Yes.
 23 Q. Okay. If you look -- go three bricks up or
 24 maybe four?
 25 A. Okay. Right at the corner of the door?

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1 Q. Yeah. See the gray discolored area?
 2 A. Okay.
 3 Q. Do you see that? We were talking about it
 4 earlier in your deposition? You thought a pipe had at
 5 some time --
 6 A. Oh, the round, the round --
 7 Q. Yes, sir.
 8 A. Oh, okay. Yeah.
 9 Q. I'm sorry, I didn't mean to confuse you there.
 10 A. I thought you were talking the discoloration
 11 right around the door there.
 12 Q. Oh, no, we'll get to that.
 13 A. Okay.
 14 Q. Just first, the gray --
 15 A. Yes.
 16 Q. Does this refresh your recollection as to what
 17 that -- as to why that discolorization was there?
 18 A. There was at one time a pipe that came out of
 19 that hole, and as I think I mentioned earlier in the
 20 deposition, it had something to do with steam because I
 21 can recollect days and days and days of seeing just a
 22 wisp of steam emitted from that pipe.
 23 Now, what that pipe was hooked to, I don't
 24 recall.
 25 Q. Now, if you look at the door itself in Exhibit

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1 No. 9, it looks to me as if it was at one point replaced
 2 or removed.
 3 Does it appear that way to you, looking at this
 4 photo?
 5 A. Yes.
 6 Q. And what would indicate that to you?
 7 A. Because the door was not that large when I
 8 bought the business.
 9 Q. This door as we see depicted in Exhibit No. 9
 10 was not that large?
 11 A. Correct.
 12 Q. Okay. It was a smaller door?
 13 A. Correct.
 14 Q. At some point in time the landlords replaced
 15 that door?
 16 MR. FARRELL: Objection, calls for speculation.
 17 THE WITNESS: I don't know who replaced the
 18 door. If you'll notice -- if I might go on, the area at
 19 the top of that door in the photograph of Exhibit 9, I
 20 had to remove one row of brick across the top of that
 21 door to bring in the new dry cleaning machine.
 22 So at that point there was -- I never removed
 23 the old door. The old door was a wooden door. There
 24 was a gap at the top of the door where I removed the
 25 brick. It was like that till I left in 1995.

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1 MR. FARRELL: Can I ask a question just to
 2 clarify before you move on?
 3 MR. GRAHAM: Sure.
 4 MR. FARRELL: Mr. Duensing, are you saying that
 5 the area we see above the door in Exhibit 9, the
 6 discolored area, that was basically open for a period of
 7 years?
 8 THE WITNESS: Yes.
 9 MR. FARRELL: What about the area to the side
 10 of the door, was that also open?
 11 THE WITNESS: I know nothing about that. That
 12 door -- that door that we see in that exhibit right
 13 there, I know nothing about. Who put that door in, how
 14 it got there, I don't know.
 15 MR. FARRELL: Thank you.
 16 (Whereupon Exhibit No. 10 was then marked for
 17 identification.)
 18 BY MR. GRAHAM:
 19 Q. Mr. Duensing, we're showing you what's been
 20 marked as Exhibit 10.
 21 Do you recognize this photo?
 22 A. Yes.
 23 Q. Okay. And what is it?
 24 A. It's a different angle of the back door and the
 25 back of the building at 712 Madison.

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1 Q. If I can direct your attention to the utility
 2 pole, kind of on the right-hand side of the picture, do
 3 you see that?
 4 A. Yes.
 5 Q. Okay. And my question is, looking at Exhibit
 6 No. 10, we see that there's pavement that extends past
 7 that utility pole.
 8 A. You mean --
 9 Q. The asphalt parking lot?
 10 A. On the left-hand side?
 11 Q. No, on the right-hand side.
 12 A. Oh, on the right-hand side. Yes.
 13 Q. Going from the right -- from the utility pole
 14 to the right-hand side of Exhibit 10. See how it's
 15 paved there, and there's a parking lot?
 16 A. From the pole to the right-hand side of the
 17 photo?
 18 Q. Yes.
 19 A. Yes.
 20 Q. Was that area of the back lot always paved
 21 during your tenure at 712 Madison?
 22 A. Yes.
 23 Q. It was.
 24 Did you have any outside dumpsters at the
 25 location of 712 Madison during your tenure at that

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1 location?
 2 A. There were dumpsters. They weren't mine, but
 3 there were dumpsters.
 4 As you can see by this photo, the building
 5 behind the pickup, the photo in Exhibit 10, behind the
 6 pickup there is another row of buildings that were all
 7 businesses.
 8 At the time that I was there, where that pickup
 9 is parked, there wasn't parking there. There was a --
 10 that fenced-in area contained dumpsters for those
 11 buildings. Obviously, they weren't accessible to me
 12 because the gates -- you know, I mean, they -- that was
 13 for them.
 14 The building that we discussed earlier that was
 15 perpendicular -- let see, let's go back to -- let's go
 16 back to Exhibit 4. I spoke of buildings on the
 17 left-hand side of this photo (indicating) that ran
 18 perpendicular to 712.
 19 They had a -- down in the corner they had a
 20 dumpster for whatever businesses. There was a carpet
 21 store. There was a Mexican restaurant at one time.
 22 There was a dumpster down there.
 23 Q. Did you use either the dumpster by the Mexican
 24 restaurant and the carpet store or the dumpster that was
 25 in the padded -- or gated area of Exhibit No. 10, did

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1 you use either of those dumpsters?
 2 A. No.
 3 Q. Okay. Did you have a separate dumpster that
 4 was provided to you by the landlord for your use as a
 5 tenant at 712 Madison?
 6 A. No.
 7 Q. So when your garbage cans got filled up inside,
 8 where did you dump them?
 9 A. The garbage can would pick them up. I had
 10 garbage service, but I didn't have a dumpster. I had a
 11 garbage can.
 12 Q. Okay. Now, what type of cans, the old metal
 13 aluminum?
 14 A. Uh-huh.
 15 Q. Okay. And where did you store those?
 16 A. Right out in back of the building.
 17 Q. If we looked at Exhibit 10, could you kind of
 18 point me to the location?
 19 A. Right below that window, where it's the bars on
 20 the window.
 21 Q. Okay. Near the blue area or to the right of
 22 the door?
 23 A. No, blue area.
 24 Q. Okay.
 25 A. I did just have one garbage can.

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1 Q. Just one?
 2 A. Yeah.
 3 Q. And the garbage service would pick it up every
 4 week?
 5 A. Yes.
 6 Q. Okay. And is that the location where -- well,
 7 strike that.
 8 So when you used -- when the filters were used
 9 from your dry-to-dry and your transfer machine, you
 10 would put them in a trash can that sat out in this area
 11 that you've just described on Exhibit 10?
 12 A. Yes.
 13 Q. Okay. And that practice was followed year
 14 round? I mean, there was no separate summer practice as
 15 opposed to winter practice as opposed to spring
 16 practice?
 17 A. No.
 18 Q. Okay. During your operations at 712 Madison,
 19 did you have any portable PERC detectors?
 20 A. No.
 21 Q. Do you know what a T-I-F detector is, TIF
 22 detector?
 23 A. No.
 24 Q. Okay. In your operations at 712 Madison, did
 25 you have any prepared checklist that you followed to

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1 inspect your equipment?
 2 A. No.
 3 Q. Okay. Did you have any types of written
 4 checklists with respect to ongoing maintenance that
 5 occurred on any of your machines?
 6 A. No.
 7 Q. Any type of maintenance logs, written
 8 maintenance logs that you had prepared for --
 9 A. No.
 10 Q. I'm sorry -- for work on those machines?
 11 A. No.
 12 Q. Did you maintain any -- during your operations
 13 at 712 Madison, during the entirety of your operations,
 14 did you keep any logs for use that reflected your use of
 15 PERC, say, for a monthly basis?
 16 A. No. But at one point for a period of maybe a
 17 year, I tracked it personally just to see what I was
 18 using.
 19 Q. Sure.
 20 A. But it wasn't an ongoing practice, no.
 21 Q. Okay.
 22 A. It was very easy to determine how much by going
 23 through the bills.
 24 Q. So did you ever keep any written log of the
 25 number of cleaning cycles that you performed on a

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1 certain week or a month?
 2 A. No.
 3 Q. Going back to your sniffer just for a second.
 4 Did you ever have reason to replace any of the carbon in
 5 that sniffer?
 6 A. No.
 7 Q. Did you replace any of the carbon filters?
 8 A. Yes.
 9 Q. You did replace those?
 10 A. Yes.
 11 Q. Did you understand that there was an activated
 12 carbon bed within that sniffer?
 13 A. I guess not because I never replaced anything
 14 in that.
 15 Q. Okay. In the dry-to-dry machines that you
 16 operated at 712 Madison, how often would you say that
 17 you checked the button traps?
 18 A. Checked the what?
 19 Q. The button traps.
 20 A. Boy, that was probably checked on a daily
 21 basis.
 22 Q. Because you had to clean the lint out of there,
 23 correct?
 24 A. Sure, sure.
 25 Q. Okay. And how did you clean the lint out of

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1 there? I mean, describe to me what you did.
 2 A. Generally, with a spotting brush.
 3 Q. Okay.
 4 A. And it was brushed over a garbage can, interior
 5 garbage can.
 6 Q. Okay. That was later disposed of outside into
 7 the outside trash can --
 8 A. Correct.
 9 Q. -- that you pointed out to us --
 10 A. Correct.
 11 Q. -- as existing in Exhibit 10?
 12 A. Yes.
 13 Q. Okay. Did your transfer machine also have a
 14 button trap?
 15 A. Yes.
 16 Q. And it was cleaned in the same manner?
 17 A. Yes.
 18 Q. Okay. Do you ever recall any incidents whereby
 19 an accident resulted whereby the button trap in either
 20 your dry-to-dry or your transfer machine overflowed?
 21 A. No.
 22 Q. Okay. And your dry-to-dry machine, did that
 23 have an exhaust damper?
 24 A. I don't know.
 25 Q. During Mr. Turigliatto's operations, do you

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1 recall him -- strike that.
 2 Do you recall Mr. Turigliatto ever discussing
 3 with you his operations whereby an accident occurred
 4 that resulted in a release of PCE due to any seals
 5 failing?
 6 A. Heat seals?
 7 Q. Seals, yeah.
 8 A. No.
 9 Q. Any -- strike that.
 10 Did you have any conversations with
 11 Mr. Turigliatto whereby Mr. Turigliatto informed you
 12 that PCE was released because of an accident related to
 13 seals on the pump malfunctioning?
 14 A. I -- I don't recall a conversation about that,
 15 no.
 16 Q. Any conversations with Mr. Turigliatto whereby
 17 he informed you that accidents occurred because of hoses
 18 breaking on the machines?
 19 A. No.
 20 Q. Or leaking -- hoses leaking?
 21 A. No.
 22 Q. Okay. Any conversations with Mr. Turigliatto
 23 whereby you were informed that there were releases of
 24 PCE because valves were left open on the machine?
 25 A. No.

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1 Q. Any conversations with Mr. Turigliatto whereby
 2 you were informed by Mr. Turigliatto that releases of
 3 PERC occurred at 712 Madison because of accidents
 4 related to any of the pipes associated with the dry
 5 cleaning equipment?
 6 A. No.
 7 Q. Well, let's do it the quick way.
 8 Did Mr. Turigliatto ever discuss with you any
 9 accidents whatsoever that happened during the time that
 10 he operated whereby PCE was released?
 11 A. The term "spill" was used in a conversation. I
 12 remember talking about "spill." Quantity, don't have a
 13 clue.
 14 Q. Machine? As to which machine it occurred from?
 15 A. Transfer.
 16 Q. Okay. Anything more than that?
 17 A. If there was, I don't -- I don't recall.
 18 Q. Okay.
 19 A. Yeah.
 20 Q. Mr. Turigliatto ever inform you that he had
 21 problems with leaking door gaskets?
 22 A. Yes.
 23 Q. Mr. Turigliatto ever inform you -- or strike
 24 that.
 25 Did Mr. Turigliatto -- strike that.

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1 Did you have any conversations with
 2 Mr. Turigliatto whereby Mr. Turigliatto informed you
 3 that there was an accident whereby PCE was released
 4 because clothes got caught in the door?
 5 A. No.
 6 Q. Did you ever have any accidents during your
 7 operation at 712 Madison whereby any seals gave way and
 8 released PERC?
 9 A. Door gasket.
 10 Q. Door gasket. Any problems with any hoses
 11 or any --
 12 A. No.
 13 Q. Okay. Any problems with any other machine --
 14 I'm sorry, did you want to say anything?
 15 A. No, just trying to hear.
 16 Q. Okay. Any problems with any other machines
 17 during your operations at 712 that resulted in any
 18 accidental spills?
 19 A. No.
 20 Q. Okay. No accidents with the filters?
 21 A. What is the definition of "accident"?
 22 Q. Something that you didn't intend to occur.
 23 A. Yes.
 24 Q. Okay. And what?
 25 A. Let me explain -- let me explain why I'm

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1 questioning.
 2 Q. Sure.
 3 A. When the filters are replaced, I mentioned
 4 opening a petcock and a drain, obviously, you have to
 5 have a vent, or it's not going to drain. Okay? Filters
 6 are replaced.
 7 Then you have to fill up that containment area
 8 again or the filter won't operate properly.
 9 Consequently, you have to keep the petcock open, keep
 10 the vent open, and begin pumping solvent through the
 11 system.
 12 And the only way you're going to know when that
 13 cartridge is full is when it begins to trickle out the
 14 vent, boom, close the vent.
 15 So did I have accidents? Yes, every time I
 16 changed the filters, there was a dribble of solvent that
 17 came out of there, and the -- and the petcock was
 18 closed.
 19 Q. So during your operations at 712 Madison, did
 20 you have any accidents whereby PCE was released from the
 21 still?
 22 A. From the still?
 23 Q. Yes, sir.
 24 A. No.
 25 Q. Okay. Any other accidents or releases of PCE

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1 that occurred by way of accident during your operations
 2 that we haven't discussed?
 3 A. No.
 4 Q. Okay.
 5 (Whereupon Exhibit No. 11 was then marked for
 6 identification.)
 7 BY MR. GRAHAM:
 8 Q. Mr. Duensing, showing to you what's been marked
 9 as Exhibit 11.
 10 Do you recognize this photo?
 11 A. Yes, I do.
 12 Q. Ah, you do. What is this?
 13 A. This is the inner wall of the discoloration you
 14 were asking me about on the exterior wall of
 15 712 Madison.
 16 Q. All right. And we see right above the door
 17 frame, there's the crack in the blocks. Is that the
 18 opening to which you were referring to earlier in your
 19 testimony?
 20 A. Correct.
 21 Q. Okay. But that was just open space for after
 22 you put in the dry-to-dry unit?
 23 A. Correct.
 24 Q. Okay. And that went straight out to the
 25 outside, there was no barrier?

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1 A. Correct.
 2 Q. Okay. Does this refresh your recollection as
 3 to what that hole is in the -- about the middle of the
 4 page, to the left-hand side of the door frame?
 5 A. No, it doesn't.
 6 Q. Okay.
 7 A. There was -- no, it doesn't.
 8 (Whereupon Exhibit No. 12 was then marked for
 9 identification.)
 10 BY MR. GRAHAM:
 11 Q. Mr. Turigliatto -- I beg your pardon --
 12 Mr. Duensing, I'm showing to you what's been marked as
 13 Exhibit 12.
 14 Do you recognize this photo?
 15 A. Yes, I do.
 16 Q. And what is this?
 17 A. It's the back door at 712 Madison.
 18 Q. All right. Does this photo accurately depict
 19 the back -- looking out the back door of 712 Madison?
 20 Does that area look substantially the same as it did
 21 during the time that you operated at 712?
 22 A. That parking block was not there.
 23 Q. Okay.
 24 A. And as you can see, the parking lines have been
 25 changed. They weren't perpendicular to the building;

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1 they were diagonal.
 2 Q. Okay.
 3 A. And like I say, that parking strip right there
 4 (indicating) was not there.
 5 Q. The parking strip --
 6 A. The blocks.
 7 Q. Okay. Anything else?
 8 A. No, not that I recall.
 9 Q. Do you recall that the parking lot was paved
 10 all the way back to the blue car that we see on the
 11 right?
 12 A. Oh, yes.
 13 Q. It extended that far?
 14 A. Yes.
 15 Q. Okay.
 16 (Whereupon Exhibit No. 13 was then marked for
 17 identification.)
 18 THE WITNESS: One thing I just noticed, and one
 19 thing I probably need to bring up. Right in back --
 20 let's -- Exhibit 9.
 21 BY MR. GRAHAM:
 22 Q. Thank you.
 23 A. I'm not sure. Right out that back door, there
 24 used to be a cement -- cement. I don't believe it was
 25 paved all the way up to the door.

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1 Q. There used to be a what? I'm sorry, I --
 2 A. Right out the back door.
 3 Q. Yes, sir.
 4 A. There was like a cement footing, like a -- not
 5 a patio, but, you know, you step out of a doorway --
 6 Q. Okay.
 7 A. -- and there's a landing. That's not there in
 8 this picture. It's all -- it's all blacktop right up to
 9 the back door. That wasn't -- I don't believe it was
 10 like that when I was there.
 11 Q. Do you recall it being bare dirt outside that
 12 door, other than the cement block that you've just
 13 described?
 14 A. I'm not sure it was dirt or not, but I know --
 15 I know there wasn't blacktop right there at the back
 16 door.
 17 Q. Was there some sort of subgrade, or do you
 18 recall what was out there?
 19 A. I don't know.
 20 Q. Okay. All right. I'd like to direct your
 21 attention to what has been marked as Exhibit 13.
 22 Let me ask you, do you recognize this?
 23 A. From the back side, no.
 24 Q. Okay. You don't know what this is?
 25 A. Pardon me?

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1 Q. You don't recognize, you don't know what --
 2 A. No.
 3 Q. So let me ask you, your dry-to-dry unit that
 4 you operated with at 712 Madison Street, taking --
 5 strike that.
 6 Not taking into consideration all the staining
 7 on the back of this unit, did your dry-to-dry unit at
 8 712 Madison Street, did the back of that unit look
 9 similar to the back of this unit?
 10 A. No -- oh, pardon me. Other than the staining?
 11 Q. Uh-huh.
 12 A. Yes, it does.
 13 Q. It does?
 14 A. Yes. My machine was never that dirty, though.
 15 Q. No, no, and I'm not trying to imply that, sir.
 16 A. Oh, okay. I didn't know what you were getting
 17 at.
 18 Q. No, no, no. I understand this is not your
 19 machine.
 20 A. Oh, okay.
 21 Q. And I'm not trying to imply and I don't want
 22 you to infer that I'm trying to say that your machine
 23 was this dirty or this clean, either way.
 24 I just wanted to know if you recognize what
 25 type of machine this is.

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1 A. I recognize that that is a dry -- or
 2 apparently, a dry cleaning machine, yes.
 3 Q. Do you recognize it as a specific brand of dry
 4 cleaning machine?
 5 A. No.
 6 Q. You don't?
 7 A. No.
 8 Q. Can you tell me whether this machine was
 9 manufactured in the United States or overseas?
 10 MR. FARRELL: Objection, calls for speculation.
 11 BY MR. GRAHAM:
 12 Q. Is there anything in this photograph that would
 13 indicate to you one way or the other whether this
 14 machine was manufactured in the United States as opposed
 15 to overseas?
 16 A. No.
 17 Q. Look right about the middle of the picture.
 18 There's a piece of the unit that has a yellow sticker on
 19 it.
 20 A. Yes.
 21 Q. Do you see that?
 22 A. Yes.
 23 Q. Do you know what that is?
 24 A. I think that's the water separator.
 25 Q. Okay. If you look to the right of the water

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1 separator, you see that cylindrical unit?
 2 A. Correct.
 3 Q. Okay. Do you know what that is?
 4 A. I want to say that is probably -- it could be
 5 the still. Awful small for a still, though. I don't
 6 know.
 7 Q. Do you recognize it as a button trap?
 8 A. No.
 9 Q. "No"? If you look at --
 10 A. It's --
 11 Q. Go ahead.
 12 A. That's huge for a button trap, in my opinion.
 13 A button trap that I'm -- maybe I'm totally -- totally
 14 gone here, but maybe something about this deep
 15 (indicating), as opposed to being something that -- that
 16 tall.
 17 Q. Let me ask you. The dry-to-dry unit that you
 18 used at 712 Madison, was that dry unit, do you know, was
 19 that manufactured in the United States, or was it
 20 manufactured overseas?
 21 A. I -- I believe it was overseas.
 22 Q. Because of the German -- what you identified as
 23 the German writing on the backplate?
 24 A. Correct, or a foreign language, and it seemed
 25 to me like it was German.

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1 Q. If you look at Exhibit 13 in the top left-hand
 2 corner, you see those two cylindrical units.
 3 A. Yes.
 4 Q. Do you know what those are?
 5 A. Filter cartridges.
 6 Q. Good job. All right.
 7 Did you have any written plan or written
 8 procedures for addressing spills of PERC at 712 Madison
 9 during the time that you operated?
 10 A. No.
 11 Q. Okay. What were the plans in case of a spill
 12 of PERC, whether they were written or not? What did you
 13 do to address any spills? Or what would you have done
 14 to address any spills?
 15 A. Well, it would depend on the size. Obviously,
 16 we had tenants on both sides. I mean, if there was
 17 anything monumental, they would need to be notified,
 18 because that building there, although there were walls,
 19 I can -- I'd be pretty sure that it wouldn't take very
 20 long for solvent to seep through the walls, you know.
 21 Q. Sure. Okay. Other than notifying your
 22 neighbors, what other producers would you have
 23 implemented --
 24 MR. FARRELL: I'll object to this line of
 25 questioning as calling for speculation.

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1 MR. GRAHAM: Let me get a clear question on the
 2 record. Just one second.
 3 Q. And let me ask you, Mr. Duensing. Did you have
 4 any procedures in place, whether written or not, that
 5 you discussed with your wife with regards to addressing
 6 any spills of PCE at 712 Madison?
 7 A. No.
 8 Q. Okay. Did you all keep blankets or drapes or
 9 sheets or anything of that nature in a specific area or
 10 handy to sop up any spills of PCE?
 11 A. No.
 12 Q. "No"?
 13 Any mops? Strike that.
 14 Did you keep any mops on hand for specifically
 15 addressing releases of PCE?
 16 A. No.
 17 Q. Okay. Where -- did you have mops on hand?
 18 A. Yes.
 19 Q. Okay. And where were those stored?
 20 A. In the restroom.
 21 Q. In the restroom?
 22 A. Uh-huh.
 23 Q. Okay. Mr. Duensing, what year did you sell the
 24 business?
 25 A. 1995.

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1 Q. And to whom did you sell the business?
 2 A. My stepson.
 3 Q. And his name is?
 4 A. I'm sorry?
 5 Q. His name is?
 6 A. Darren Miller, M-i-l-l-e-r.
 7 Q. Was it he alone that solely purchased the
 8 business, or did he have a partner? If you know.
 9 A. He had a wife. I'm not sure if both of their
 10 names were on the business or not. I don't know.
 11 Q. After you sold the business to Mr. Miller in
 12 approximately 1995, did you stay around, kind of like
 13 Mr. Turigliatto did with you, to train him and show him
 14 the ropes, so to speak?
 15 A. Not for 30 days.
 16 Q. For any amount of time?
 17 A. Yes.
 18 Q. For how long?
 19 A. Three or four days.
 20 Q. Three or four days.
 21 And when Mr. Miller purchased the business, he
 22 also purchased the dry cleaning equipment, I take it?
 23 A. Correct.
 24 Q. Okay. At that time it was still the same
 25 dry-to-dry machine that we've been talking about

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1 throughout this deposition?
 2 A. Yes.
 3 Q. Okay. And he also purchased the sniffer, I
 4 take it?
 5 A. Yes.
 6 Q. Okay. Let me ask you, when you bought that
 7 used dry-to-dry machine, did it come with a manual?
 8 A. No. It had an electrical schematic that I got,
 9 but as far as an operating manual, no.
 10 Q. And so to your knowledge, in those three or
 11 four days that you stuck around at 712 Madison to help
 12 Mr. Miller, he used the same equipment as you had in
 13 place, correct?
 14 A. Yes.
 15 Q. Okay. Do you have any knowledge of Mr. Miller
 16 purchasing any additional equipment?
 17 A. No.
 18 Q. Any -- do you have any knowledge of Mr. Miller
 19 purchasing any replacement equipment?
 20 A. No.
 21 Q. Do you have any -- do you have contact
 22 information for Mr. Miller?
 23 A. Not at my fingertips, no.
 24 Q. Okay. But if I asked you to provide that to me
 25 at a later date, that's something that you could get to

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1 me?
 2 A. I don't see why not.
 3 Q. Okay. When you sold the business in 1995 to
 4 Mr. Miller, did you leave any 55-gallon drums behind at
 5 the property?
 6 A. The drums that the filters were stored in from
 7 the waste haulers. I'm sure they were there.
 8 Q. Okay. But that wasn't an 55-gallon drum, was
 9 it?
 10 A. Yes.
 11 Q. Oh, it was?
 12 A. Yes. The containers that the filters -- the
 13 used filters were transported in were 55-gallon drums
 14 with a seal ring.
 15 Q. And when did you first start using those
 16 55-gallon drums with the sealed rings for disposal of
 17 filters?
 18 A. Mid '80s.
 19 Q. When all these new regulations were coming into
 20 place --
 21 A. Yes.
 22 Q. -- that you were speaking of earlier?
 23 A. Yes.
 24 (Whereupon Exhibit No. 14 was then marked for
 25 identification.)

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1 BY MR. GRAHAM:
 2 Q. Mr. Duensing, I've handed to you what's been
 3 marked as Exhibit No. 14. You can take as much time as
 4 you want to review this or as little time as you want.
 5 I only have a couple questions.
 6 Let me know when you're ready.
 7 A. (Witness complied.) Okay.
 8 Q. First I want to ask you, Mr. Duensing, we were
 9 speaking earlier about wastewater, water separator
 10 water, processed water, and you indicated earlier in
 11 your testimony that that had gone into the sink.
 12 Do you ever recall using that water that came
 13 from the water separator, did you ever take that water
 14 and put it back into the boiler?
 15 A. No.
 16 Q. Okay. That wasn't a practice that you
 17 maintained?
 18 A. No.
 19 Q. Okay. I'd like to direct your attention to
 20 Exhibit No. 14.
 21 First of all, have you ever seen this document
 22 before?
 23 A. I saw it the day that you and I met, and you
 24 showed me.
 25 Q. Okay. Is this your signature on the front page

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1 under No. 8?
 2 A. Yes, it is.
 3 Q. Okay. And you recognize that as your
 4 handwriting?
 5 A. Yes.
 6 Q. Okay. Do you recall any conversations at any
 7 time during your operations at 712 Madison, any
 8 conversations with a Cynthia Herrick from the
 9 Fairfield-Suisun Water District -- Sewer District, I beg
 10 your pardon?
 11 A. No.
 12 Q. Okay. You don't remember Fairfield-Suisun
 13 Sewer District ever inspecting your facility at
 14 712 Madison?
 15 A. No.
 16 Q. Okay. If I could get you to turn -- again, the
 17 Bates No. is JH 10773.
 18 A. (Witness complied.)
 19 Q. Under No. 4, it says -- do you see where I'm
 20 looking, sir?
 21 A. Yes.
 22 Q. Okay. It says, "Solvent and water separator
 23 servicing a 30-pound capacity transfer drying unit."
 24 Do you see that?
 25 A. Yes.

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1 Q. Okay. Was your transfer unit actually
 2 30 pound?
 3 A. I don't believe so.
 4 Q. I believe your testimony earlier today was it
 5 was 25 --
 6 A. 25-pound.
 7 Q. -- pound, correct?
 8 A. Yes.
 9 Q. Okay. That's all I have for that.
 10 (Whereupon Exhibit No. 15 was then marked for
 11 identification.)
 12 BY MR. GRAHAM:
 13 Q. Mr. Duensing, I've handed to you what's been
 14 marked as Exhibit No. 15. Take as much time to review
 15 that and let me know when you're ready.
 16 A. (Witness complied.) Okay.
 17 Q. All right. Let me ask you if you've ever seen
 18 this document before.
 19 A. I don't recall, no.
 20 Q. Okay. And does this refresh your recollection
 21 that you had any conversations or any interactions with
 22 a Cynthia D. Herrick, Industrial Waste Inspector from
 23 Fairfield-Suisun Sewer District?
 24 A. I don't recall this meeting.
 25 Q. Okay. And, again, it makes reference in the

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1 first bullet point to a 30-pound capacity transfer
 2 machine.
 3 To your knowledge, that statement's not
 4 correct, is it?
 5 A. In looking back at Exhibit 14, the wording, I
 6 believe they're referring to the reclaimer. It says
 7 drying unit. That could very easily have been a
 8 30-pound drying unit.
 9 Q. And that would tend to indicate to me that it
 10 would be a transfer machine.
 11 A. Well, it appears to me what she was
 12 inspecting --
 13 Q. Uh-huh.
 14 A. -- was the drying unit of a transfer situation.
 15 Q. Okay.
 16 A. I had the reclaimer still there, so that
 17 portion was still transfer in anybody's eyes but mine.
 18 Q. I gotcha.
 19 A. Now, I see nothing here -- although -- this
 20 holds true, she interviewed me, and I told her I hadn't
 21 used the still in a year and a half.
 22 That would refer to the dry-to-dry unit that in
 23 earlier testimony I said I very rarely used it because
 24 the machine went through so much solvent, and I never
 25 had the occasion to use the still.

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1 Q. Bullet point No. 4, it states -- well, let me
 2 ask you this: In seeing this document, does this
 3 refresh your recollection that you had conversations
 4 with Ms. Herrick?
 5 A. Not at all.
 6 MR. FARRELL: Objection, asked and answered.
 7 BY MR. GRAHAM:
 8 Q. Bullet point No. 4, it states,
 9 "Approximately 300 gallons of
 10 perchloroethylene are used each year."
 11 Is that a -- do you find that statement to be
 12 correct?
 13 A. Yes.
 14 Q. That at the time in 1986 you were using
 15 approximately 300 gallons of PERC each year?
 16 A. I don't think that is a statement of fact. I
 17 probably used more than that.
 18 But with all the regulations, I fell into an
 19 entirely different category if I used more than
 20 300 gallons of PERC a year. Anytime anyone asked me how
 21 much I used, 300 gallons a year.
 22 Q. Okay. And No. 5, it states,
 23 "There's no direct discharge to the
 24 sanitary sewer. Water separator drains
 25 into a bucket. All overflow discharges

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1 onto the ground behind the building."
 2 Do you see that?
 3 A. I see that, yes.
 4 Q. Okay. Is that a true statement?
 5 A. I would say no.
 6 Q. Because as you testified earlier, your water
 7 separator was discharging into the sink?
 8 A. Correct.
 9 Q. Okay. And then No. 6,
 10 "Carbon core filters are aired out
 11 and disposed with regular garbage."
 12 Is that a true statement?
 13 A. True.
 14 Q. Okay. That's all I have on that.
 15 MR. GRAHAM: Let's take about a five- to
 16 seven-minute break, and I'll try to get you out of here.
 17 (Recess taken.)
 18 BY MR. GRAHAM:
 19 Q. Mr. Duensing, you ready to continue?
 20 A. Correct, yes.
 21 Q. All right. You understand that even though we
 22 took our break, you are still under oath?
 23 A. Yes.
 24 Q. Okay. Mr. Duensing, are you familiar with
 25 another cleaners that operated within Fairfield known as

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1 Bertain Cleaners?
 2 A. By name only.
 3 Q. Okay.
 4 MR. SHAMIYEH: What was the response, please?
 5 THE WITNESS: My response was "by name only."
 6 BY MR. GRAHAM:
 7 Q. And what do you mean "by name only"?
 8 A. I knew there was a Bertain Cleaners. I never
 9 had contact with them.
 10 Q. Do you know if they used PERC dry cleaning
 11 machines in their operations?
 12 A. I have no knowledge.
 13 Q. Okay. Do you have any personal knowledge with
 14 respect to a Bernard -- strike that.
 15 Do you have any personal knowledge with respect
 16 to a Gillespie Cleaners that was located on Jackson
 17 Street?
 18 A. By name only.
 19 Q. Okay.
 20 MR. SHAMIYEH: Excuse me, I couldn't hear the
 21 name. The name?
 22 MR. GRAHAM: Gillespie.
 23 Q. "By name only," meaning you knew that there was
 24 a Gillespie Cleaners, but that's it?
 25 A. Yes. I believe those two cleaners you just

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1 mentioned were earlier on before I got into the
 2 business. Prior to 1979.
 3 Q. Okay. Did you ever hear of a company that
 4 operated in Fairfield by the name of Tick Tock Watch
 5 Repair?
 6 A. Yes.
 7 Q. Okay. And do you know where they were located?
 8 A. On West Texas, between Madison and Jackson.
 9 Q. And did you know anybody that worked at Tick
 10 Tock Watch Repair?
 11 A. Not by name. I did use them once.
 12 Q. Okay.
 13 (Whereupon Exhibit No. 16 was then marked for
 14 identification.)
 15 BY MR. GRAHAM:
 16 Q. Mr. Duensing, we handed you what's been marked
 17 as Exhibit No. 16.
 18 And let me ask you, do you recognize this
 19 document?
 20 A. No.
 21 Q. Okay. I'd like to direct your attention to a
 22 condition -- I'm sorry -- I'd like to direct your
 23 attention to bullet point 5, "Authority To Construct."
 24 Do you see that?
 25 A. Yes.

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1 Q. Okay. On the second line there, it's written,
 2 "51 Martin 30 # washer."
 3 Do you see that?
 4 A. Yes.
 5 Q. Okay. Does that refresh your recollection as
 6 to any equipment that you may have used at One-Hour
 7 Cleaners during your operations?
 8 A. That indicates to me that that Martin machine
 9 was a 30-pound.
 10 Q. Okay.
 11 A. Not a 25, like I said.
 12 Q. And the 51 that precedes that Martin, does that
 13 mean anything to you?
 14 A. No.
 15 Q. Okay. Then we see next, it says, "Hoyt 50 #
 16 reclaimer."
 17 Do you see that?
 18 A. Yes.
 19 Q. Okay. And does that refresh your recollection
 20 as to any type of the equipment that you had at
 21 712 Madison?
 22 A. That recollects my memory as to the brand of
 23 the reclaimer that I had, that I purchased from
 24 Mr. Turigliatto.
 25 Q. So this would be making reference to the

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1 transfer unit?
 2 A. Correct.
 3 Q. And then below that, it says, "Bowe" --
 4 B-o-w-e -- "A60 carbon adsorber."
 5 Do you see that?
 6 A. Yes.
 7 Q. Does that refresh your recollection as to the
 8 manufacturer of the type of carbon adsorber you utilized
 9 at 712 Madison?
 10 A. No, it doesn't.
 11 Q. Do you have any understanding -- or strike
 12 that.
 13 Did you utilize the carbon adsorber at
 14 712 Madison Street with your dry-to-dry system?
 15 A. No.
 16 Q. If you look at the signature block, it says,
 17 "PSD Engineer."
 18 I know we can't read, unfortunately, the
 19 signature above that, but does "PSD Engineer," does that
 20 mean anything to you?
 21 A. No.
 22 Q. Okay. Can you make out the date on this
 23 document?
 24 A. No.
 25 Q. Okay. And under bullet point 3, it states,

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1 "Statement Of Compliance."
 2 Do you see that?
 3 A. Yes.
 4 Q. And then the second line down in parens, it
 5 says, "Waste Hauler Technichem," close paren.
 6 Do you see that?
 7 A. Yes.
 8 Q. Okay. Is Technichem a waste hauler that you
 9 utilized in your operations at 712 Madison?
 10 A. Yes.
 11 Q. Okay. And did you utilize any other waste
 12 hauler other than Technichem during the entirety of your
 13 operations at 712 Madison?
 14 A. Yes.
 15 Q. And what were the names of other waste haulers
 16 that you utilized?
 17 A. The other one I recall was Safety-Kleen.
 18 Q. Any others?
 19 A. No.
 20 Q. Was there a specific period in time whereby you
 21 utilized Technichem as opposed to Safety-Kleen or
 22 Safety-Kleen as opposed to Technichem?
 23 Does any line of demarcation stand out in your
 24 mind?
 25 A. No.

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1 Q. Okay. All right. And that's all I have for
 2 that.
 3 So earlier we were talking, Mr. Duensing, that
 4 you had -- you kept a 55-gallon drum on the site for
 5 purposes of disposing of filters; is that correct?
 6 A. Correct.
 7 Q. Okay. And where was that 55-gallon drum
 8 located? Inside or outside?
 9 A. Oh, inside.
 10 Q. It was inside?
 11 A. Yes.
 12 Q. Whereabouts inside?
 13 A. Between the compressor. I want to say between
 14 the compressor and the back door, or between the
 15 compressor and the first piece of equipment that we used
 16 to press. I know it was in the back half of the
 17 building.
 18 Q. Back half of the building, okay.
 19 And during the entirety of your operations --
 20 well, strike that.
 21 You began utilizing the 55-gallon drum for the
 22 disposal of filters somewhere in the mid '80s; is that
 23 correct?
 24 A. Yes.
 25 Q. And at any time from the mid '80s up until the

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1 time that you quit operating at 712 Madison, was there
 2 an occasion whereby you would have more than one
 3 55-gallon drum?
 4 A. Yes.
 5 Q. Okay. And how many 55-gallon -- well, strike
 6 that.
 7 What was the maximum amount of 55-gallon drums
 8 that you kept on site at one time?
 9 A. Two.
 10 Q. Two. Both for filters?
 11 A. Yes.
 12 Q. Did you put anything else in those 55-gallon
 13 drums other than used filters?
 14 A. No.
 15 MR. GRAHAM: Mr. Duensing, I'm going to pass my
 16 questioning now to other counsel. I'm going to review
 17 my notes, kind of go over some of the exhibits.
 18 I reserve my right to ask you any follow-up
 19 questions based upon information that I still have in my
 20 note that I haven't covered or based upon what other
 21 counsel ask you.
 22 So as of now, I'm through. Thank you very much
 23 for coming. And I'll pass it down to the next counsel.
 24 THE WITNESS: Sure.
 25

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1 EXAMINATION
 2 BY MS. McADAM:
 3 Q. Mr. Duensing, are you ready?
 4 A. I'm sorry.
 5 Q. Are you ready --
 6 A. Yes.
 7 Q. -- to proceed? Okay.
 8 We met earlier today. I'm Allison McAdam, and
 9 I represent Jewel Hirsch in this matter.
 10 A. Yes.
 11 Q. And I just have a few follow-up questions. I'm
 12 going to skip around. So if you're not following along
 13 with me, let me know.
 14 A. Okay.
 15 Q. We'll try to get you out of here.
 16 Earlier this morning, which seems like a while
 17 ago now, we talked about a box of documents that you
 18 have in your possession.
 19 A. Yes.
 20 Q. Is that something you'll make available for --
 21 to me for copying so that all of us may look at those
 22 documents?
 23 A. Sure.
 24 Q. All right. All right. If you will refer back
 25 to Exhibit 15.

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1 A. (Witness complied.) Yes.
 2 Q. Is it your understanding that as of the date of
 3 Exhibit 15 you were actually operating the dry-to-dry
 4 machine? Was that your testimony, that that was your
 5 understanding?
 6 A. I don't quite understand the question.
 7 Q. As -- if you'll look at Exhibit 15, it's dated
 8 1986.
 9 A. Correct.
 10 Q. And when we were talking about it before, I
 11 thought I understood your testimony to be that although
 12 this references -- that this references a transfer
 13 machine, but that you thought the reference to the still
 14 not operating at this time meant that you were actually
 15 using the dry-to-dry unit at this time?
 16 A. Correct.
 17 Q. Was my understanding correct?
 18 A. Yes.
 19 Q. Okay. Now, you mentioned that several vendors
 20 that you used, specifically you recalled Echo,
 21 Goss-Jewett and Work Room Supply.
 22 Did Van Waters & Rogers ever deliver any
 23 supplies to you during your operations at 712?
 24 A. Yes.
 25 Q. Okay. How about a company named MBL?

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1 A. Oh, yes, yes.
 2 Q. Did MBL ever deliver PERC to you?
 3 A. Yes.
 4 Q. Did MBL deliver PERC to you using a truck with
 5 a hose that went through the back door?
 6 A. Yes.
 7 Q. All right. Did Van Waters deliver PERC to you
 8 at 712 Madison?
 9 A. Allison, Van Waters, I don't recall. I only
 10 used them once or twice in the whole time, but the name
 11 just -- and I don't recall whether I got supplies from
 12 them, if I got PERC from them. I don't recall.
 13 Q. Do you recall any of the supply delivery
 14 companies when they were delivering PERC using a nozzle
 15 to get the PERC into the dry cleaning machine?
 16 A. Yes.
 17 Q. Do you recall during any of those deliveries
 18 witnessing PERC being released from the nozzle?
 19 A. The actual entry?
 20 Q. Outside of the machine?
 21 A. Oh, no.
 22 Q. Did you ever see them wind up the hose back to
 23 the truck so that the hose dragged on the ground?
 24 A. Yes.
 25 Q. During any of the times where you saw the hose

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1 rolled back to the truck, did you ever see any sort of
 2 liquid being released from the hose?
 3 A. Yes.
 4 Q. Do you recall specifically what company you
 5 might have seen PERC being released from the hose during
 6 the time that it was being rolled back to the delivery
 7 truck?
 8 A. No.
 9 Q. It could have been MBL --
 10 A. Echo Sales.
 11 Q. Echo Sales or --
 12 A. Goss-Jewett.
 13 Q. Or Goss-Jewett.
 14 A. I think I -- in producing these -- this box,
 15 I've got check stubs in there for I have no idea how
 16 many years.
 17 The statement I'm going to make, I think most
 18 of my PERC was delivered by Echo or MBL. I had
 19 completely forgotten about MBL till you mentioned it.
 20 But we'll be able to prove that out by my check stubs.
 21 Q. Those were the companies you used the most
 22 frequent?
 23 A. Primarily, yes, for solvent. I mean, I got
 24 supplies from all of those at one time or another, from
 25 all of those individuals. Supplies being hangers,

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1 struts that go on the hangers, paper that -- tapes that
 2 go on the hangers, spotting supplies, press pads.
 3 Q. When you saw PERC being released from the hose
 4 as it was being recoiled, did you see the delivery
 5 company do anything to address the PERC on the ground?
 6 A. No.
 7 Q. Did you see that on more than one occasion?
 8 And when I say "that," I mean PERC being
 9 released during the recoiling of the hose back to the
 10 delivery truck.
 11 A. I don't know. I don't recall. I do remember
 12 it happening, no.
 13 Q. And I don't suppose you remember when you saw
 14 that?
 15 A. No.
 16 Q. Bear with me as I look through my notes.
 17 MR. GRAHAM: Let me ask you a question,
 18 Mr. Duensing. Do you recall that occurrence happening,
 19 where you saw liquid coming out of the delivery hose, do
 20 you recall that instance to be at the time that you were
 21 using the dry-to-dry system or the transfer system?
 22 THE WITNESS: I don't recall.
 23 MR. GRAHAM: Okay.
 24 BY MS. McADAM:
 25 Q. All right. Now, we talked earlier today about

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1 the waterproofing mixture, the five-to-one PERC mixture,
 2 and I believe you mentioned that you used that from
 3 approximately 1979 through 1981 and that you ceased that
 4 process due to spillage.
 5 Is that a correct understanding of your
 6 testimony? Let me rephrase.
 7 A. I didn't like the process because the
 8 possibility was there.
 9 Q. Do you recall an occurrence where there was
 10 spillage during that process?
 11 A. Every time that there was a garment dipped in
 12 that bucket and returned to the dry cleaner, the space
 13 between the bucket and the dry cleaner, which was
 14 probably that far (indicating), there was a trail of
 15 PERC that went across.
 16 You took the garment out of the bucket, wrung
 17 it out as best as possible into the bucket, and -- but
 18 as you were returning it to the dry cleaner to go ahead
 19 and extract, there was a trail of solvent that went
 20 across the floor.
 21 That's why I didn't like that system.
 22 Q. Was there a containment system for the transfer
 23 system?
 24 A. No.
 25 Q. Do you recall during your use of the transfer

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1 system any need to notify the neighbors regarding a
 2 spill?
 3 A. No.
 4 MS. McADAM: All right. I think those are my
 5 questions for now. Thank you very much.
 6 EXAMINATION
 7 BY MR. PRICE:
 8 Q. Good afternoon, Mr. Duensing. You and I met
 9 earlier today. My name is Jeremy Price, and I represent
 10 Obie Goins, Lucilla Hazard, Judy Lawing and Ray Johnson.
 11 I just have a couple of quick questions, follow-up
 12 questions for you.
 13 During the time you operated the transfer
 14 system, how often did you receive deliveries of PERC?
 15 A. I would get PERC, as best as I can remember,
 16 about once a month.
 17 Q. And how long was the process -- how long did
 18 the process take from the start of the delivery to the
 19 end of the delivery of the PERC?
 20 A. Oh, maybe 20 minutes, half hour.
 21 Q. Okay.
 22 A. Now, that would all depend on whether the
 23 individual vendor was just delivering PERC or whether
 24 the particular -- I can remember instances where the
 25 particular vehicle had PERC plus my other items on it.

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1 So the vendor would be there longer than a half
 2 hour because he had to unload hangers or whatever on top
 3 of the pumping of PERC.
 4 Q. Okay. During the time that you operated the
 5 dry-to-dry system, how often did you receive deliveries
 6 of PERC?
 7 A. Maybe every three weeks. More often than the
 8 transfer.
 9 Q. And how long was that process? How long did
 10 that take from start of the delivery to the end of the
 11 delivery?
 12 A. Same time.
 13 Q. 20 minutes?
 14 A. Yeah.
 15 Q. During the time that you operated the transfer
 16 system -- strike that.
 17 Each time PERC was delivered to your business
 18 during the time you operated it, was the mechanism by
 19 which it was delivered through a hose? Was it always
 20 through a hose?
 21 A. Yes.
 22 Q. Okay.
 23 A. I never received drums of PERC. How it got off
 24 the truck, I can't swear that it was always 55-gallon
 25 drums. It might have been a larger container.

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1 I couldn't bear witness to that exactly, but it
 2 was always in a hose.
 3 MR. PRICE: Thank you, Mr. Duensing. That's
 4 all I have.
 5 MR. SHAMIYEH: You done?
 6 MR. PRICE: Yeah.
 7 EXAMINATION
 8 BY MR. SHAMIYEH:
 9 Q. Hi, Mr. Duensing. I'm again, Nick Shamiyeh. I
 10 represent Mr. and Mrs. Assad, who own the property at
 11 716 Jackson Street, the next block over from you.
 12 When you purchased the business, did you have
 13 to take a test from the State?
 14 A. To my knowledge, it wasn't the State. It was
 15 the school that I went to. Whether the State was
 16 funding and operating that school, I don't know.
 17 I never took -- boy. No, the only test I ever
 18 took for the license was at the school. That was the
 19 only one I ever took.
 20 Q. Do you recall whether or not you received a
 21 license in your name as an operator of a dry cleaning
 22 from the State?
 23 A. Yes, I did.
 24 Q. Okay. Was that renewed annually; do you know?
 25 Do you recall?

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1 A. No, one time.
 2 Q. Do you know which agency issued that license to
 3 you?
 4 A. No, I don't.
 5 Q. Do you have copies of that license by any
 6 chance?
 7 A. No, I don't.
 8 Q. Okay. You mentioned earlier that sometimes
 9 there were some spills from the hose, and also when you
 10 filled the filler, there was some dripping.
 11 Did you do anything about those drippings or
 12 those spills?
 13 A. I wiped them up.
 14 Q. Okay. What, with a cloth or a mop or what?
 15 A. Cloth.
 16 Q. What did you do with that cloth?
 17 A. Garbage can. Either that -- garbage can.
 18 Q. These drops, would they also disappear -- I
 19 mean, evaporate?
 20 A. I was going to recant what I just said.
 21 PERC, or PCE as an element, evaporates rapidly.
 22 So the procedure that I discussed earlier about the
 23 filters and pumping till they were full, I got to the
 24 point where I held a rag at the base of that vent until
 25 it dribbled out, shut the vent.

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1 And then that cloth -- I can't imagine I threw
 2 them away. I just set it out and let it evaporate, and
 3 then used the cloth again because PERC or PCE evaporated
 4 rapidly.
 5 Now, I'm -- I'm sorry, you had a question
 6 before I started.
 7 Q. That is my question, whether or not it
 8 evaporates or you clean it up, or both.
 9 A. No, it evaporated. But obviously, I didn't
 10 want liquid floating around on the floor for somebody --
 11 it affected rubber and plastic terribly.
 12 I mean, if you could -- there were garments
 13 that came through that if you didn't pay real close
 14 attention to the instructions, they would have a plastic
 15 clasp or but- -- I don't want to say button, but a clasp
 16 or something on a coat. PERC would eat it up, it would
 17 just melt it.
 18 So obviously, anything that was around in the
 19 area, I wanted to clean up so that nobody stepped in it,
 20 because it would affect their shoes.
 21 Q. Okay. During the period that you operated the
 22 cleaners, did you have occasions where either the toilet
 23 or the sink ever clogged up or spills over?
 24 A. Not to my knowledge.
 25 Q. During your operation of the cleaners, did you

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1 ever receive a citation from any governmental agency for
 2 any wrongdoing at your cleaners?
 3 A. No.
 4 And if I might add, they even stopped the
 5 boiler inspection, the annual boiler inspections,
 6 because I didn't have any employees.
 7 Q. Do you know, do you recall when Mr. Turigliatto
 8 opened the business first --
 9 A. I didn't.
 10 Q. How long did he operate the business before you
 11 bought it, your father-in-law?
 12 A. How long did I operate it --
 13 Q. Your father-in-law?
 14 A. Oh, how long did he operate it?
 15 Q. Yes.
 16 A. Real close to 20 years. When he actually
 17 bought it, I don't know, but --
 18 Q. He bought it from someone else, or did he
 19 establish the business?
 20 A. He bought it from someone else.
 21 Q. Do you happen to know the name of the person
 22 that he bought it from?
 23 A. The two names that came up earlier were Leigh.
 24 And the other name was Gene Carter, but I didn't
 25 recognize him as being in the dry cleaning business.

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1 Harry, Harry Leigh.
 2 Q. Are they still around; do you know?
 3 A. When that took place?
 4 Q. No, no. Do you know whether or not Harry Leigh
 5 or Gene Carter are still around?
 6 A. No, I don't.
 7 Q. Did you do any cleaning and pressing for other
 8 cleaners in the area?
 9 A. Upon occasion when there was a breakdown. I
 10 can remember -- I can remember doing some dry cleaning
 11 and pressing for Jewel Hirsch and vice-versa.
 12 Q. Anybody else you can remember? Anybody else?
 13 A. This Bunny's Cleaners, I can remember one time
 14 that she broke down, and I dry cleaned some clothes for
 15 her.
 16 Q. Do you know her name?
 17 A. No, I don't.
 18 Q. Did you ever do any work for a company named
 19 Service Cleaners?
 20 A. Service Cleaners. No, that doesn't ring a
 21 bell.
 22 Q. How about Bertain Cleaners, you were asked
 23 about earlier?
 24 A. Bertain, by name only. I never -- I never had
 25 any dealings with them.

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1 Q. Were they in business when you were in business
 2 there; do you know?
 3 A. I don't recall if they were or not. In fact, I
 4 couldn't even tell you where they were located, to be
 5 honest. That's why -- by name only, I know the name
 6 Bertain Cleaners, but I don't know where they were
 7 located.
 8 Q. How about Gillespie Cleaners?
 9 A. That's another one. Gillespie Cleaners I
 10 believe was before my time. And I know that one by
 11 name, but I don't know the location of that one either.
 12 Q. I think I'm done, but just let me take a look
 13 at my notes for a second.
 14 You mentioned Tick Tock Watch and Clock
 15 Repairs. Did they have any solvents in there that you
 16 know of?
 17 A. Not to my -- I have no knowledge.
 18 Q. Okay. Were there any other cleaners in the
 19 area, dry cleaners other than Hirsch and Bunny's, that
 20 you know of while you were there?
 21 MR. FARRELL: I'll object as vague as to
 22 location.
 23 MS. McADAM: And I'll object to the
 24 description.
 25 THE WITNESS: One more time, please?

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1 BY MR. SHAMIYEH:
 2 Q. Any other cleaners, are you aware of any other
 3 dry cleaners in the downtown --
 4 A. In the downtown area?
 5 Q. Yes.
 6 MR. FARRELL: Same objection.
 7 MR. GRAHAM: Join.
 8 MS. McADAM: Join.
 9 THE WITNESS: No, not -- I don't know what kind
 10 of radius you might be talking but --
 11 BY SHAMIYEH:
 12 Q. Five-block radius?
 13 A. Five blocks? Possibly. Bunny's -- the Bunny's
 14 Cleaners that I referred to earlier was probably five
 15 blocks away.
 16 Q. Okay. Other than Bunny's and Hirsch that you
 17 recall?
 18 MS. McADAM: I'll object --
 19 MR. SHAMIYEH: Other than Bunny's and Hirsch?
 20 MS. McADAM: -- object as vague.
 21 THE WITNESS: Which one was closer?
 22 BY MR. SHAMIYEH:
 23 Q. No, do you know of any other?
 24 A. Oh, other. No.
 25 MR. SHAMIYEH: I have no other questions.

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1 Thank you.
 2 THE WITNESS: Okay.
 3 EXAMINATION
 4 BY MR. FARRELL:
 5 Q. I do have a few, Mr. Duensing. You want to
 6 take a quick break or just roll forward? It's your
 7 decision.
 8 A. No, let's go.
 9 Q. Okay. As you know, I represent Mr. Tomasini
 10 and Mr. Ragle, the owners of the 712 Madison property.
 11 During the period you operated the dry cleaner
 12 at 712 Madison, were either Mr. Ragle or Mr. Tomasini
 13 involved in any way in the operation of the dry cleaning
 14 business?
 15 A. No.
 16 Q. Did at any time during the period you operated
 17 the dry cleaner, did Mr. Ragle or Mr. Tomasini direct in
 18 any way the manner in which you conducted your business
 19 operations?
 20 A. No.
 21 Q. During the period you operated the dry cleaner,
 22 did Mr. Ragle or Mr. Tomasini receive a percentage of
 23 your monthly profits as payment toward the rent for
 24 property?
 25 A. I don't know exactly what you mean by that

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1 because --
 2 Q. Well, let me try it a different way.
 3 You -- during the period of time that you
 4 rented or leased 712 Madison to operate the dry cleaner,
 5 I believe you testified earlier for a few years that was
 6 written pursuant to a written lease, and then after
 7 that, it was essentially an oral month-to-month tenancy.
 8 Is that accurate?
 9 A. Correct.
 10 Q. Okay. Did you pay the landlords a straight
 11 amount per month for rental of the property during that
 12 period?
 13 A. Yes.
 14 Q. Was there any other consideration you paid to
 15 the owners at any time during your occupancy of the
 16 property for use of the premises?
 17 A. No.
 18 Q. Do you recall that what your rent was when you
 19 started renting the property in 1979?
 20 A. I was looking at this document, which is
 21 Exhibit 5, and was amazed that it's dated 2001, and it
 22 is an agreement for \$925 a month.
 23 And I believe in the final year or two that I
 24 leased 712 Madison from Mr. Ragle and Mr. Tomasini, that
 25 was the rent I was paying then, \$925 a month.

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1 18 years earlier, we were probably in the \$700
2 range. But I believe -- I believe 925 was what I was
3 paying.
4 Q. At the end?
5 A. At the end.
6 Q. To the box of documents you referenced earlier
7 that Ms. McAdam was asking you about, are there records
8 in there of what you paid monthly to the property owners
9 for rent?
10 A. The check stubs, yeah.
11 Q. And how far back in time to those go, if you
12 know?
13 A. Probably mid '80s.
14 Q. Do you recall as you sit here today what the
15 dimensions of 712 Madison, the length and width?
16 A. The dimensions?
17 Q. Right, just the size of the unit, if you
18 recall.
19 A. I'm sure -- I'm sure there were discussions
20 because there was something mentioned about having the
21 interior painted, having the interior carpeted. But I
22 can't recall those dimensions, no.
23 Q. While you operated the dry cleaning business at
24 712 Madison, did you do any commercial dry cleaning?
25 A. Any commercial what?

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1 Q. Dry cleaning? In other words, did you clean on
2 a commercial basis, or was it strictly retail?
3 A. Yes.
4 Q. Maybe that's a bad distinction.
5 MR. SHAMIYEH: Wholesale?
6 BY MR. FARRELL:
7 Q. Wholesale versus retail, how about that, or
8 does that --
9 A. Well, I don't know if you want to call it
10 wholesale versus retail -- oh, I see what you're getting
11 at. No.
12 Q. What percentage of your dry cleaning business
13 at 712 Madison was devoted to just individual customers
14 walking in with orders versus an industrial client
15 bringing in a large quantity per month or per week or
16 something like that?
17 A. Probably I want to say 75 percent was walk-in
18 traffic.
19 Q. You were asked a series of questions a little
20 bit ago about the process of loading the PERC into the
21 equipment, the transfer unit and then also the
22 dry-to-dry system through the use of the hose from the
23 truck at the back of the lot.
24 And you also testified that there were
25 occasions when the hose would leak some PERC when it was

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1 being rolled up after delivery.
2 You may have answered this, let me ask it
3 again, because I didn't hear the answer if you did.
4 Do you recall on how many occasions you
5 witnessed that hose leaking a little bit of PERC as it
6 was rolled up?
7 A. No, I don't recall.
8 Q. Can you give me your best estimate of how many
9 times you recall seeing that over the course of the
10 years that you operated? Less than ten? Less than --
11 A. I would say -- I would say less than ten.
12 Q. Less than five?
13 A. It's hard to say because I wasn't always there
14 when it was rolled up. There were many occasions that I
15 directed -- the only reason I'm saying what I said, is
16 there were many occasions where I directed the hose out
17 for the guy so that he didn't knock over all my stuff
18 and drag his dirty hose over my clothes and -- so that's
19 why I'm saying I saw -- you know, how many times it was,
20 I'm going to go with less than 10.
21 Q. More than one time?
22 A. Yes.
23 Q. All right. So more than once but less than 10?
24 A. Yes.
25 Q. You personally observed that happening?

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1 A. Yes.
2 Q. Okay. All right. Just give me a minute here
3 to just quickly do some follow-up.
4 You were asked earlier today -- look back at
5 Exhibit 2, which is a photograph, I believe, of the
6 front of that 712 Madison.
7 Do you see that?
8 A. Yes.
9 Q. You were asked some questions by Mr. Doyle
10 about the sewer project that took place out in front of
11 Madison.
12 Do you recall that?
13 A. Yes.
14 Q. That resulted in this new brick work that we
15 see.
16 The alleyway off to the left of the building
17 that you see in Exhibit 2, did that sewer work encompass
18 that area, if you recall, or was it just on Madison
19 Street itself?
20 A. No, just Madison Street itself.
21 Q. Anytime during your period of operation at
22 712 Madison, do you recall that alleyway next to I guess
23 that's seven -- is that 710?
24 A. I think it went 10, 12, 14.
25 Q. So 710 would be the unit on the far left that

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1 we see in this picture?
 2 A. Correct.
 3 Q. All right. Anytime during your period of
 4 operation do you recall that alleyway that we see next
 5 to 710 Madison being -- having any sewer work done or
 6 what appeared to be sewer line work done?
 7 A. Yes.
 8 Q. Do you recall when that was?
 9 A. No.
 10 Q. Was it separate and apart from that project
 11 that you described earlier where Madison and some other
 12 main streets were dug up?
 13 A. Yes, it was.
 14 Q. Do you recall whether that was before or
 15 after -- the alley-related work was before or after the
 16 Madison Street work was done?
 17 A. I want to say before.
 18 Q. Do you know what that work involved, the work
 19 in the alley?
 20 A. No, I don't. I know the alley was blocked off,
 21 though. We couldn't use the alley because it was dug up
 22 for construction. Now --
 23 Q. Do you recall when that work took place
 24 relative to when you started operating the dry cleaner?
 25 A. No.

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1 Q. Do you recall anything about the work in terms
 2 of how deep they -- that area was excavated?
 3 A. I don't recall how deep, but I do recall
 4 piping. Whether this was -- and I don't know if it was
 5 sewer. I can't tell you.
 6 Q. But you recall seeing some piping go in that
 7 alleyway --
 8 A. Yes.
 9 Q. -- as part of that project?
 10 A. Yes.
 11 Q. Do you know who performed that work? Was it
 12 the City of Fairfield or the Sewer District or --
 13 A. Oh, I'm almost sure it was the City.
 14 Q. Do you recall having any conversations with
 15 anybody related -- or with the City related to that
 16 work?
 17 A. No, except how long is it going to take you,
 18 and when's the alley going to be open. I -- yeah, I
 19 just -- no, I don't recall any conversations.
 20 Q. All right. There was some discussion earlier
 21 about the operator of the dry cleaner before
 22 Mr. Turigliatto. I believe you mentioned Mr. Harry
 23 Leigh in response to Mr. Graham's questions.
 24 Do you recall that?
 25 A. Yes.

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1 Q. Okay. Do you know Harry Leigh, or did you know
 2 him?
 3 A. No.
 4 Q. Have you ever met Mr. Leigh?
 5 A. No.
 6 Q. Do you know if he's alive or deceased?
 7 A. No, I don't.
 8 Q. Do you have any contact information for
 9 Mr. Leigh or any of his relatives?
 10 A. No.
 11 Q. Do you happen to know the name of the dry
 12 cleaning business during the period before
 13 Mr. Turigliatto took it over?
 14 A. No.
 15 Q. And very briefly, you were questioned this
 16 morning about the Martinizing, One-Hour Martinizing
 17 franchise, versus the operation of a dry cleaner using a
 18 Martin machine.
 19 Do you know if there were actual franchised
 20 Martin dry cleaning establishments in existence during
 21 the period of time that you were operating the
 22 712 Madison?
 23 A. No, I don't.
 24 Q. Your understanding is the term Martinizing
 25 referred to a dry cleaning technique that utilized a

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1 Martin machine?
 2 A. Oh, I'm confident that that's what it refers
 3 to. That information was given to me -- given to me by
 4 Mr. Turigliatto, that that's what it referred to.
 5 One-Hour Martinizing referred to the machine
 6 because it was Martin equipment that was in the
 7 facility.
 8 Q. Does Mr. Turigliatto have any documents that
 9 you know of related to his operation of the dry cleaning
 10 business at 712 Madison?
 11 A. He's told me no.
 12 MR. FARRELL: I think I have nothing further.
 13 I'll look over my notes quickly while we go around one
 14 last time. Thank you.
 15 FURTHER EXAMINATION
 16 BY MR. GRAHAM:
 17 Q. Mr. Duensing, I just wanted to follow up on
 18 some questions Mr. Farrell was asking you with respect
 19 to work that was being done in the alley adjacent to the
 20 building that encompasses 712 Madison.
 21 Is it the case that the work that was done in
 22 that alley stopped at the point of the building that --
 23 what I'm trying to say is, did it only encompass the
 24 area right adjacent to the building, or did it continue
 25 down further into the parking lot?

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1 If you look at Exhibit 12, I'm just trying to
 2 get an idea -- you see the cars parked to the left-hand
 3 side of that, that photograph that's depicted in
 4 Exhibit 12.
 5 And that if we were to keep coming towards
 6 where the photographer is taking the picture, we'd run
 7 up against that alley, correct?
 8 A. Correct.
 9 Q. Okay. And what I'm just trying to do is get an
 10 idea of where this alley work stopped. Did it go all
 11 the way back by this line of cars? Did it stop at the
 12 building?
 13 A. I don't recall.
 14 Q. Good enough.
 15 A. Now, putting my lawyer hat on for just a
 16 minute, it seems to me like it would be fairly easy to
 17 figure that out, or at least -- I haven't been back to
 18 the building in quite a while.
 19 But -- and I don't know how many times that
 20 parking lot has been asphalted or patched or whatever.
 21 But when they fill in the work and asphalt it, it's
 22 going to be -- leave a definite mark as to where the
 23 construction was.
 24 Like I say, I don't know how many times that
 25 parking lot's been redone, but, you know, I'd be

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1 interested myself to go and look and see if there's any
 2 telltale lines of asphalt where it might be determined
 3 that the work started here and continued on to this
 4 area.
 5 I don't recall -- back to your question, I
 6 don't recall how far that construction went.
 7 MR. GRAHAM: Okay. That's all I have.
 8 FURTHER EXAMINATION
 9 BY MS. McADAM:
 10 Q. I have two follow-up questions, I believe.
 11 If you'll pull Exhibit 6 and 7 just to clarify.
 12 A. (Witness complied.) Oh, 6 and 7. Okay.
 13 Q. Okay. The private office reflected on
 14 Exhibits 6 and 7, was that there during your operations
 15 at 712 Madison?
 16 A. No.
 17 Q. Okay. Do you know anything about the
 18 operations of a business known as Fairfield Printing,
 19 Fairfield Printers on Jackson Street, during your
 20 operations on Madison Avenue?
 21 A. No.
 22 MS. McADAM: Thank you very much.
 23 FURTHER EXAMINATION
 24 BY MR. PRICE:
 25 Q. Mr. Duensing, are you familiar with a company

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1 called Fairfield Cleaners?
 2 A. Yes.
 3 Q. Are you aware of any instances where there was
 4 release of PERC at Fairfield Cleaners?
 5 A. No.
 6 Q. Okay. Do you know a gentleman by the name of
 7 Obie Goins?
 8 A. By name only.
 9 Q. Okay. Do you know a gentleman by the name of
 10 Ray Johnson?
 11 A. By name only.
 12 Q. And do you know a gentleman by the name of John
 13 Blue, B-l-u-e?
 14 A. No.
 15 Q. Have you ever met Obie Goins?
 16 A. I don't think so.
 17 Q. How did you know his name?
 18 A. Through Jewel Hirsch, I believe, is where I
 19 heard the name.
 20 Q. Okay. Have you ever met Ray Johnson?
 21 A. No.
 22 Q. How do you know his name?
 23 A. Same -- same way. They were -- I think both of
 24 those gentleman somehow were associated with Jewel
 25 Hirsch. Don't ask me how because I don't even know

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1 that, except -- well, I'm only surmising.
 2 I think -- I think I was told that Obie --
 3 MS. McADAM: Object to the extent it calls for
 4 speculation.
 5 THE WITNESS: No.
 6 MR. PRICE: Thank you. That's it.
 7 FURTHER EXAMINATION
 8 BY MR. SHAMIYEH:
 9 Q. One clean-up question. At any time while you
 10 operated the cleaners, did you have any knowledge of any
 11 leakage in the sewer line?
 12 A. No.
 13 Q. Any breakage in the sewer line that you know
 14 of?
 15 A. No.
 16 Q. Inside or outside the store, both?
 17 A. What now?
 18 Q. Inside or outside the store?
 19 A. Oh. No.
 20 MR. SHAMIYEH: Okay. That's it. Thank you.
 21 MR. GRAHAM: Last chance?
 22 MR. FARRELL: Nothing further. Thank you.
 23 MR. GRAHAM: Thank you.
 24 (The deposition was concluded at 4:50 p.m.)
 25 --o0o--

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1 Pursuant to Section 2025 (q) (1) of the code of
 2 Civil Procedure of the State of California, I hereby
 3 certify that I have read my deposition transcript, pages
 4 6 - 221, made those changes and corrections that I deem
 5 necessary, and approve the same as now true and correct.
 6
 7 Dated this _____ day of _____, 2011.
 8
 9
 10
 11
 12 _____
 13 GERALD DUENSING
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

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1 June 15, 2011
 2
 3 GERALD DUENSING
 4 5861 Lupin Lane
 5 Pollock Pines, CA 95726
 6
 7 Re: MICHAEL McINNIS and ROBERT DITTMER vs.
 8 JEWEL HIRSCH, etc., et al.
 9 Case No. FCS033636
 10
 11 Dear Mr. Duensing,
 12
 13 The transcript of your deposition taken on
 14 Friday, June 10, 2011, is now available at this office
 15 for your review, correction (if necessary) and
 16 signature. A copy of your deposition has been forwarded
 17 to counsel.
 18 If you have any questions about reading or
 19 signing your deposition, you may wish to discuss with
 20 counsel whether it is desirable for you to review,
 21 correct, and sign the transcript before it is filed with
 22 the court.
 23 You have thirty days from the date of this
 24 letter within which to review the transcript. If you so
 25 wish to review it, please call this office to arrange
 for an appointment.
 Very truly yours,
 Toni A. Sarris
 Office Manager
 Delta Deposition
 cc - all counsel

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1 I, ANTONIA SEVERSON, a licensed Certified
 2 Shorthand Reporter, duly qualified and certified as such
 3 by the State of California, do hereby certify: That
 4 prior to being examined, the witness named in the
 5 foregoing deposition was by me duly sworn to testify to
 6 the truth, the whole truth, and nothing but the truth;
 7 That the said deposition was by me recorded
 8 stenographically at the time and place herein mentioned,
 9 and the foregoing pages constitute a full, true, complete
 10 and correct record of the testimony given by the said
 11 witness;
 12 That I am a disinterested person, not being in
 13 any way interested in the outcome of said action, nor
 14 connected with, nor related to any of the parties in said
 15 action, or to their counsel, in any manner whatsoever.
 16
 17 Dated this 15th day of June, 2011.
 18
 19
 20
 21 _____
 22 ANTONIA SEVERSON, CSR NO. 3430
 23 CERTIFIED SHORTHAND REPORTER
 24
 25

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1 Delta Deposition Reporting
 2 P.O. Box 7312
 3 Stockton, California 95267
 4 Phone: (209) 477-0837 (888) 477-0856
 5 Fax: (209) 477-0856
 6
 7 Case Name: MICHAEL McINNIS and ROBERT DITTMER vs.
 8 JEWEL HIRSCH, etc., et al.
 9 Case No: FCS033636
 10 Date of Deposition: JUNE 10, 2011
 11 Deponent: GERALD DUENSING
 12
 13 The Original transcript of this deposition was
 14 available in this office during business hours on
 15 business days for a period of 40 calendar days, and that
 16 all counsel and deponent were given written notice, in
 17 which the following occurred:
 18
 19 The witness and parties waived examination
 20 and reading of the deposition.
 21
 22 The witness corrected, approved or refused
 23 to approve the deposition by letter to
 24 this office, hereunto attached.
 25
 The witness appeared in this office,
 corrected and signed the deposition
 as indicated herein.
 The witness refused to sign the
 deposition.
 The witness failed to appear at this
 office.
 Date: _____

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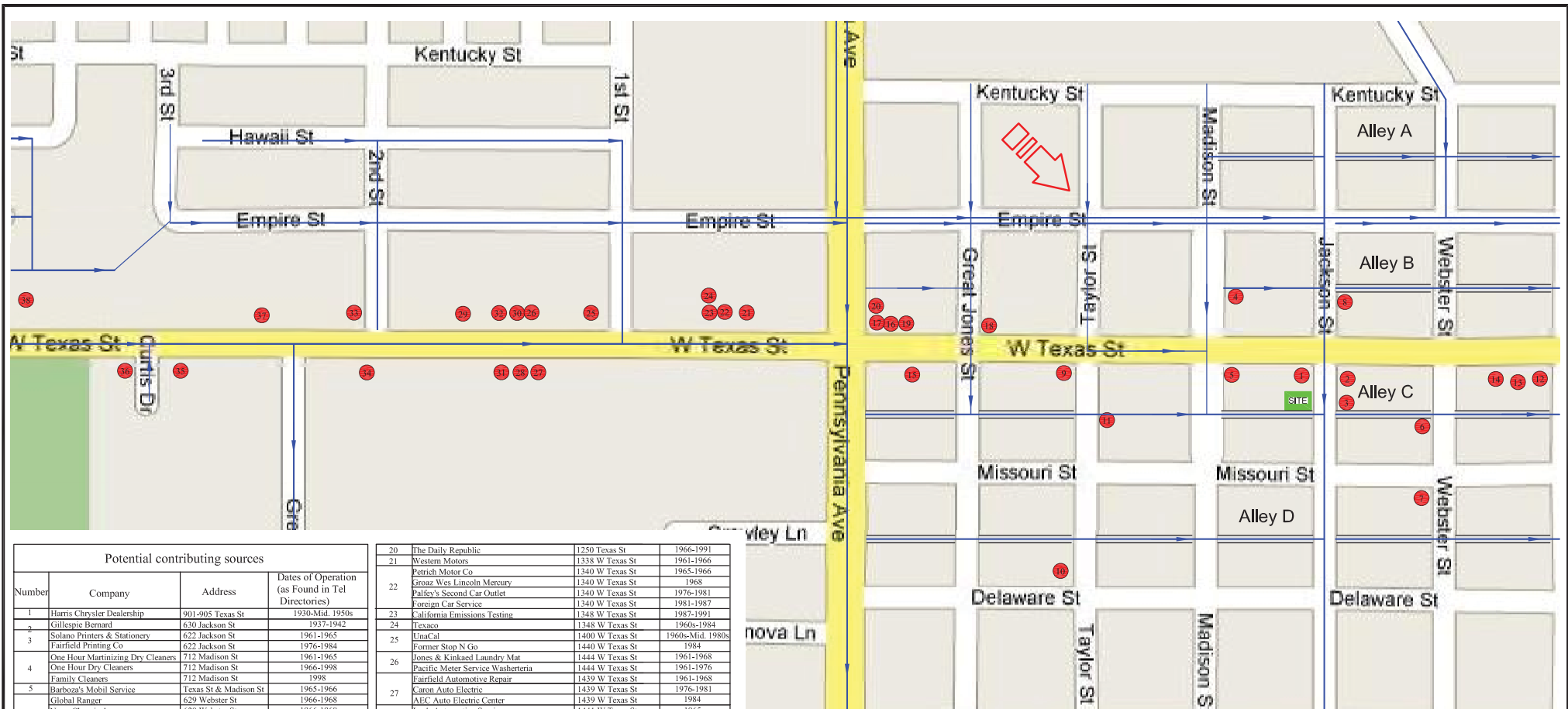
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Number	Company	Address	Dates of Operation (as Found in Tel Directories)
1	Harris Chrysler Dealership	901-905 Texas St	1930-Mid. 1950s
2	Gilgespie Bernard	630 Jackson St	1937-1942
3	Solano Printers & Stationery	622 Jackson St	1961-1965
	Fairfield Printing Co	622 Jackson St	1976-1984
4	One Hour Martinizing Dry Cleaners	712 Madison St	1961-1965
	One Hour Dry Cleaners	712 Madison St	1966-1995
	Family Cleaners	712 Madison St	1998
5	Barboza's Mobil Service	Texas St & Madison St	1965-1966
	Global Ranger	629 Webster St	1966-1968
	News Chronical	629 Webster St	1966-1968
	Times-Herald	629 Webster St	1977-1981
	Doney Media	629 Webster St	1981
7	Stevenson's Insta-Print	817 Missouri St	1976-1980
8	Service Cleaners & Laundry	716 Jackson St	Late 1940s
	Bertian's Cleaners & Laundry	716 Jackson St	1961-1968
9	American Cleaners	1119 Texas St	1961-1966
10	Oliver Automotive Service	525 Taylor St	1961-1968
	Wesner Automotive Service	525 Taylor St	1976-1991
11	Service Garage	636 Taylor St	1961-1979
	Aamco Transmissions	636 Taylor St	1984-1991
12	Woodard Chevrolet	709 Texas St	1937-1942
13	Wilson Motor Co	729 Texas St	Late 1940s
	Woodard Chevrolet	729 Texas St	Late 1940s-1965
14	Wilson Motor Co	751 Texas St	1937-1950
15	Mobil	1247 W Texas St	E. 1970s-Mid. 1980
	Chevron	1247 W Texas St	Mid. 1980s-Present
16	Gilgespie Cleaners	1248 Texas St	Late 1940s
17	Gilgespie Cleaners	1250 Texas St	1950
18	Eckland Garage	1200 Texas St	Late 1940s
	Digerud Auto Parts	1200 Texas St	Late 1940s-1987
	Freudenberg Buick	1246 Texas St	1950
19	Lane Buick-Pointiac Inc	1246 Texas St	1961-1965
	Goodyear Service Store	1246 Texas St	1968

20	The Daily Republic	1250 Texas St	1966-1991
21	Western Motors	1338 W Texas St	1961-1966
	Petrich Motor Co	1340 W Texas St	1965-1966
22	Grozax Wes Lincoln Mercury	1340 W Texas St	1968
	Palfey's Second Car Outlet	1340 W Texas St	1976-1981
	Foreign Car Service	1340 W Texas St	1981-1987
23	California Emissions Testing	1348 W Texas St	1987-1991
24	Texaco	1348 W Texas St	1960s-1984
25	Unocal	1400 W Texas St	1960s-Mid. 1980s
	Former Stop N Go	1440 W Texas St	1984
26	Jones & Kinkaid Laundry Mat	1444 W Texas St	1961-1968
	Pacific Meter Service Washerteria	1444 W Texas St	1961-1976
	Fairfield Automotive Repair	1439 W Texas St	1961-1968
	Caron Auto Electric	1439 W Texas St	1976-1981
27	AEC Auto Electric Center	1439 W Texas St	1984
	Leo's Automotive Service	1441 W Texas St	1965
28	Earl's Automotive Service	1441 W Texas St	1968
	Automotive Engine Service	1441 W Texas St	1977-1991
29	Exxon	1470 W Texas St	Mid. 1960-1986
30	Pay Less Cleaners	1446 W Texas St	1961-1985
	Matt Osborn's Fairfield Tire Service	1451 W Texas St	1965
31	Triple S Tires	1451 W Texas St	1968
	Graphic Auto Body	1451 W Texas St	1961-1991
	Washinghouse Coin-op & Dry Cleaners	1450 W Texas St	1965-1968
32	Bunny Cleaners	1450 W Texas St	1976-1984
	Shamrock Professional Cleaners & Laundry	1450 W Texas St	1985-1987
33	Delta Coin-op Laundry	1500 W Texas St	1991-1998
	Lauderland Coin-op	1500 W Texas St	1991
34	German Car Service	1501 W Texas St	1984-1991
35	OK Auto Float Tire Store	1605 W Texas St	1961-1968
	Ken's Tire Center	1635 W Texas St	1980
36	Quality Tune-Up	1635 W Texas St	1987-1991
37	Texas Petroleum Services	1530 W Texas St	1976-Present
	Texaco	1740 W Texas St	1970s-1988
38	Exxon	1740 W Texas St	1988-Mid. 2002
	Velero	1740 W Texas St	2002-Present

Legend:

- Potential Contributing Sources - Tier 1
- Sanitary Sewer
- ⇨ Shallow ground water flow direction



GENESIS ENGINEERING & REDEVELOPMENT

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TIER 1 PROPERTIES
Contributing Source Investigation
Fairfield Cleaners and Laundry
625 Jackson, Fairfield, California

Designed:	Z.A.	Project Number:	105-O.03	Figure:	3
Drawn:	Z.A.	File:	105-O.03-03		
Checked:	J.C.	Revision:	xxxxx	Date:	03/14/08