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SHEPPARD, MULLIN, RICHTER & HAMPTON
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW
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SAN FRANCISCO OFFICE
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WRITER'S DIRECT DIAL NUMBER

(213) 617-4135

March 27, 1992

OUR FILE NUMBER

232-45265

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Mr. Thomas Dunkelman
U. S. Environmental Protection Agency
Region IX
Mail Stop H-7-1
75 Hawthorne Street
San Francisco, California 94105

Re: Del Amo Superfund Site

Dear Mr. Dunkelman:

Enclosed are the documents currently in the possession of Coca-Cola Enterprises' counsel relating to the soil cleanup that the Coca-Cola Bottling Company of Los Angeles and Amcena Properties, Inc. conducted at the Pacific Gateway Drive property.

Please call me if you have any comments or questions.

Very truly yours,

Stephen J. O'Neil

Stephen J. O'Neil

for SHEPPARD, MULLIN, RICHTER & HAMPTON

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Enclosures

0639-02591

Manny

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

January 29, 1990

Mr. Peter Beaver
Senior Project Manager
Coca Cola Enterprises - West/U.S. Technical
Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150
Tempe, AZ 85282

Dear Mr. Beaver:

ACTIVITY FEE PROGRAM

By your letter of December 11, 1989 to the Department of Health Services (Department) you have identified your client, Coca Cola Enterprises - West, as the party primarily responsible for taking action to characterize and remedy any public health and/or environmental threats posed by any uncontrolled releases of hazardous substances at 19875 Pacific Gateway Drive in Carson, CA. Pursuant to legislation (Chapter 269, Statutes of 1989) which was recently signed into law by the Governor, you are obligated to pay activity fees to partially cover the Department's cost of evaluating and overseeing your actions to characterize and satisfactorily remediate this site. This includes the evaluation of the site assessment report you submitted and providing you with recommendations for future remedial actions.

Chapter 269 sets out specific fees for the various phases of activity associated with characterizing and abating hazardous substance release sites based on the relative size of each site as estimated by the Department. Enclosed are the various definitions of site and activity sizes as set forth in Chapter 269 as well as the fee schedule. For purposes of establishing a fee for the first phase of activity being conducted at Coca Cola Distribution Facility, the Department has made a preliminary determination that the site is a medium sized site as defined by Chapter 269. You should be aware that the law does allow the Department to make adjustments to initial site size determinations so that fee levels may be raised or lowered for subsequent phases of activity based on additional data. However, the law does not allow for retroactive application of such adjustments.

The Department has also made a determination that a Preliminary Endangerment Assessment (PEA) must be conducted at this site to determine whether it will be necessary to take some type of initial removal or remedial action to stabilize site conditions to reduce any acute public

health and environmental threats posed by currents site conditions. The fee for conducting a PEA is $ 7,500 regardless of site size.

Chapter 269 requires the State Board of Equalization (Board) to collect the fees established by the Department under the Act. You may expect to receive a demand from the State Board in the near future based on the fee levels described herein. As each phase of activity associated with a fee is completed at the site, a demand for the fee that is associated with the next phase of activity will be sent to you by the State Board. In cases where fees are not paid promptly, the State Board is empowered to seize personal as well as business assets and take other enforcement actions to ensure payment.

Please contact Manny Alonzo at (213)590-4904 if you have any questions regarding this new program or required actions at the site.

Sincerely,

John J. Kearns
Regional Administrator

Enclosures

cc: Raul Ramirez
Coca Cola Enterprises West
1334 South Central Avenue
Los Angeles, CA 90021

bcc: Vicki Vandergriff
Joe Sirks
Al Arellano
Manny Alonzo

MA:JK:pr

0639-0259

ATTACHMENT A

SB 475: Site Size Definitions

Site Sizes	Small site - RI/FS* cost less than $250K and FRA* less than $1M
	Medium site - RI/FS cost between $250K and $1.25M and FRA between $1M and $5M
	Large site - RI/FS cost between $1.25M and $5M and FRA between $5M and $20M
	Extra-Large site - RI/FS cost greater than $5M and FRA greater than $20M
Removal Action (RA)	Small RA - less than $500K
	Medium RA - $500K to $1M
	Large RA - $1M to $5M
	Extra-Large RA - greater than $5M
Operation and Maintenance (O&M)	Small O&M - Annual cost less than $500K
	Medium O&M - Annual cost $500K to $1M
	Large O&M - Annual cost $1M to $5M
	Extra-Large O&M - Annual cost greater than $5M

* RI/FS = Remedial Investigation/Feasibility Study
* FRA = Final Remedial Action

SB 475 Fee Schedule

Site Size Estimation Fee	$5,000 (applicable to all sites)
Endangerment Assessment Fee	$7,500 (applicable to all sites)
Removal Action Oversight Fee	Variable, dependent on site size: $14,500 (small sites) $37,000 (medium sites) $73,500 (large sites) $147,000 (extra-large sites)
Remedial Investigation/Feasibility Study (RI/FS) Oversight Fee	Variable, dependent on site size: $21,500 (small sites) $43,000 (medium sites) $85,500 (large sites) $200,000 (extra-large sites)
Remedial Action Plan (RAP) Oversight Fee	Variable, dependent on site size: $4,500 (small sites) $9,000 (medium sites) $18,000 (large sites) $38,000 (extra-large sites)
Remedial Design Oversight Fee	Variable, dependent on site size: $7,500 (small sites) $14,500 (medium sites) $29,000 (large sites) $80,000 (extra-large sites)
Final Remedial Action (FRA) Oversight Fee	Variable, dependent on site size: $10,000 (small sites) $20,000 (medium sites) $40,000 (large sites) $106,000 (extra-large sites)
Operation and Maintenance (O&M) Oversight Fee	Variable, dependent on site size: $6,000 per year (small sites) $12,000 per year (medium sites) $14,000 per year (large sites) $34,000 per year (extra-large sites)

Prorating/Adjusting SB 475 Fees

I. Prorating Fees

SB 475 fees take effect July 1, 1989. Fees for phases of site investigation and cleanups in progress as of that date are to be prorated as described below. Fees will not be assessed for phases completed prior to July 1, 1989; instead, there will be 100% cost recovery per H&SC 25360.

To prorate the fee:

1. identify phase of activity in progress on July 1, 1989, and site or activity size;
2. identify defined length of activity;
3. divide activity fee by number of months defined for activity;
4. the result is the *monthly fee quotient*;
5. multiply number of months the site has been in the phase of activity (as of July 1, 1989) by monthly fee quotient; and
6. subtract that amount from total fee.
7. The result is the *prorated fee*.

For fee proration purposes, SB 475 stipulates the following timeline for phases of site activity:

Estimation of Site Size	3 months (all sites)
Preliminary Endangerment Assessment	3 months (all sites)
Removal Actions	4 months (small sites) 6 months (medium sites) 12 months (large sites) 24 months (extra-large sites)
Remedial Investigation/ Feasibility Study (RI/FS)	9 months (small action) 17 months (medium action) 33 months (large action) 60 months (extra-large action)
Remedial Action Plan (RAP)	3 months (small sites) 3 months (medium sites) 6 months (large sites) 9 months (extra-large sites)
Remedial Design (RD)	2 months (small sites) 3 months (medium sites) 6 months (large sites) 12 months (extra-large sites)
Final Remedial Actions	4 months (small sites) 8 months (medium sites) 20 months (large sites) 40 months (extra-large sites)
Operation and Maintenance (O&M)	12 months per year (all sites)

For fee assessment purposes, RI/FS activity will not be considered to be commenced prior to the date that DHS approved an RI/FS workplan. For determining the start date for other phases of activity that may be ongoing, the following will apply:

- the RAP phase begins on the date the final RI/FS report was approved by DHS.
- the RD phase begins on the date the final RAP was approved by DHS.
- the final remedial action phase begins on the date the final remedial design was approved by DHS.
- the O&M phase begins on the date that the site cleanup certification form was signed by DHS.

II. Adjusting Fees

DHS is authorized to reclassify site size at any time. However, for fee assessment purposes, the new size classification would only apply to fees assessed for subsequent phases of site investigation and cleanup activity and not to completed or current phases.

III. Additional Charges to RPs

Although SB 475 has established specific fees to be charged to RPs for site investigation and cleanup oversight, the law continues to require DHS to recover all identifiable costs beyond those covered by the fees. Essentially, the new fees are analogous to "downpayments" against future cost recovery actions, since actual oversight costs will be in excess of the fees established by SB 475.

A Plus

Office Products & Services
COMMERCIAL SPECIALISTS
12 HUGHES STREET
SUITE D-103
IRVINE, CALIFORNIA 92718
714/837-5070 · 837-5360

FACSIMILE TRANSMISSION SHEET

TO: Drexel Chapman
Seeley Company

FROM: Georemediation Inc.

REGARDING: Phone conversation 10/25/88

INSTRUCTIONS:

301 000001

EPA ID NO.	SITE NAME STREET CITY COUNTY CODE AND NAME	STATE ZIP CONG DIST.	NFA. FLAG	OPRBLE UNIT	EVENT TYPE	ACTUAL START DATE	ACTUAL COMPL DATE	CURRENT EVENT LEAD
CAD092516772	INTERWEB 5251 W IMPERIAL HWY LOS ANGELES 037 LOS ANGELES	CA 90045		00	DS1 PA1	 03/01/84	08/01/80 05/01/85	EPA (FUND) STATE(FUND)
CAD098627516	INTERWEB/RR DONNELLEY & SONS CO 19681 PACIFIC GATEWAY DR TORRANCE 037 LOS ANGELES	CA 90502	NFA	00	DS1 PA1		03/01/85 11/01/87	EPA (FUND)
CAD981370984	INTL ANODIZING CORP OF CA 1840 OAK ST TORRANCE 037 LOS ANGELES	CA 90501	NFA	00	DS1 PA1	 12/01/85	02/01/86 06/01/86	STATE(FUND) STATE(FUND)
CAD029654894	IT TRANSP CORP WILMINGTON 233 E "D" ST WILMINGTON 037 LOS ANGELES	CA 90744		00	DS1 PA1	 08/01/84	06/01/81 05/01/85	EPA (FUND) STATE(FUND)
CAD980735914	IT YARD 217 N LAGOON AVE WILMINGTON 037 LOS ANGELES	CA 90744		00	DS1 PA1	 06/01/84	11/01/79 11/01/84	EPA (FUND) STATE(FUND)
CAD028528230	JEFFRIES BANKNOTE CO 1330 W PICO BLVD LOS ANGELES 037 LOS ANGELES	CA 90015	NFA	00	DS1 PA1	 03/01/85	05/01/81 05/01/85	EPA (FUND) STATE(FUND)
CAD008335564	JENNINGS PLATING CO 1760 PONTIUS AVE LOS ANGELES 037 LOS ANGELES	CA 90025	NFA	00	DS1 PA1	 03/01/84	06/01/80 09/01/84	EPA (FUND) STATE(FUND)
CAD980636245	JOHN DEERE KILLEFER WORKS 5601 DOWNEY RD VERNON 037 LOS ANGELES	CA 90058	NFA	00	DS1 PA1		06/01/81 05/01/85	EPA (FUND) STATE(FUND)

0639-02591

0639-0259)

cokprop.let

October 26, 1988

California Department of Health Services
107 S. Grand Ave, Room 7011
Los Angeles, California 90007

Gentlemen:

GeoRemediation Inc. is currently investigating the property located at 19875 Pacific Gateway Drive in Torrance, California for the Coca-Cola Enterprizes, West. Our investigation is to include the possibility of hazardous materials on or beneath the site. As part of our investigation we have discovered four sites within one block of the property which are listed as EPA Super Fund sites. The names of the property owners and their addresses are as follows:

Amoco Chemicals Corp.
1225 W. 196th St.
Torrance, California

Interweb/ RR Donelly and Sons Co.
19681 Pacfic Gateway Dr.
Torrance California

Montrose Chemical Corp.
20201 S Normandie
Torrance, California

Tylan Corp.
19220 S Normandie
Torrance, California

GeoRemediation feels that in order to advise our client we need to reveiw the pertinent reports on these sites. To that end we are requesting your assistance in obtaining these reports.

Thank you for your help. Please do not hesitate to contact me, Greg East at (714) 380-0599 with any information you can give me regarding this matter.

Very Truly Yours,

Gregory Porter East
Environmental Engineer

301 000003

0639-0259)

COMMONWEALTH LAND TITLE COMPANY

LOS ANGELES COUNTY

PRELIMINARY REPORT

. Shea and Gould
. 1800 Avenue of the Stars
. Los Angeles, California 90067
ATTN: Dan Herscher

20750 Ventura Blvd., #350
Woodland Hills, CA 91364
(818) 888-7655

YOUR NO.: AMCENA PROPERTIES
OUR NO. 86-33747-20

IN RESPONSE TO THE ABOVE REFERENCED APPLICATION FOR A POLICY OF TITLE INSURANCE, COMMONWEALTH LAND TITLE COMPANY HEREBY REPORTS THAT IT IS PREPARED TO ISSUE, OR CAUSE TO BE ISSUED, AS OF THE DATE HEREOF, A POLICY OR POLICIES OF TITLE INSURANCE DESCRIBING THE LAND AND THE ESTATE OR INTEREST THEREIN HEREINAFTER SET FORTH, INSURING AGAINST LOSS WHICH MAY BE SUSTAINED BY REASON OF ANY DEFECT, LIEN OR ENCUMBRANCE NOT SHOWN OR REFERRED TO AS AN EXCEPTION BELOW OR NOT EXCLUDED FROM COVERAGE PURSUANT TO THE PRINTED SCHEDULES, CONDITIONS AND STIPULATIONS OF SAID POLICY FORMS.

THE PRINTED EXCEPTIONS AND EXCLUSIONS FROM THE COVERAGE OF SAID POLICY OR POLICIES ARE SET FORTH IN EXHIBIT A ATTACHED. COPIES OF THE POLICY FORMS SHOULD BE READ. THEY ARE AVAILABLE FROM THE OFFICE WHICH ISSUED THIS REPORT.

THIS REPORT (AND ANY SUPPLEMENTS OR AMENDMENTS HERETO) IS ISSUED SOLELY FOR THE PURPOSE OF FACILITATING THE ISSUANCE OF A POLICY OF TITLE INSURANCE AND NO LIABILITY IS ASSUMED HEREBY. IF IT IS DESIRED THAT LIABILITY BE ASSUMED PRIOR TO THE ISSUANCE OF A POLICY OF TITLE INSURANCE, A BINDER OR COMMITMENT SHOULD BE REQUESTED.

DATED: December 28, 1987, AT 7:30 A.M.

Bill Cuddyer
Bill Cuddyer
TITLE OFFICER

cc:

SCHEDULE A

THE FORM OF POLICY OF TITLE INSURANCE CONTEMPLATED BY THIS REPORT IS:

A CLTA Owners Policy

THE ESTATE OR INTEREST IN THE LAND HEREINAFTER DESCRIBED OR REFERRED TO COVERED BY THIS REPORT IS:

a fee

TITLE TO SAID ESTATE OR INTEREST AT THE DATE HEREOF IS VESTED IN:

AMCENA PROPERTIES, INC.

THE LAND REFERRED TO IN THIS REPORT IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF LOS ANGELES, AND IS DESCRIBED AS FOLLOWS:

All that certain real property situated in the City of Los Angeles, County of Los Angeles, State of California said property being more particularly described as Parcel C as said Parcel is shown on that certain map entitled "Parcel Map - L.A. No. 3041", filed in Book 61 of Parcel Maps at Pages 81 and 82, Official Records of said County.

SCHEDULE B

AT THE DATE HEREOF EXCEPTIONS TO COVERAGE, IN ADDITION TO THE PRINTED EXCEPTIONS AND EXCLUSIONS IN SAID POLICY FORM WOULD BE AS FOLLOWS:

1. General and special taxes, including any personal property taxes, and assessments collected with taxes for the fiscal year 1987-1988:

Total:	$55,617.19	
First Installment:	27,808.60	Delinquent
Penalty:	2,780.86	
Second Installment:	27,808.59	Open
Penalty and Costs:	2,790.85	
Code:	510	
Parcel:	7351-34-57	

1a. The lien of supplemental taxes, if any, assessed pursuant to the provisions of Chapter 3.5 (commencing with Section 75) of the Revenue and Taxation Code of the State of California.

2. A Covenant and Agreement, executed by CC&F Western Development Company, Inc., in favor of the City of Los Angeles, and recorded January 24, 1975 as Instrument No. 2983 in Book M-4902 Page 374, Official Records.

Said Covenant and Agreement, among other things, provides for the following:

Said first party covenants and agrees to and with said City of Los Angeles to submit four copies of a plot plan over that above described property to the Fire Department for approval and review, prior to the issuance of building permits.

This covenant and agreement shall run with the land and be binding upon any future owners, encumbrancers, their successors, heirs or assignees, and shall continue in effect unless otherwide released by authority of the Fire Department of the City of Los Angeles.

3. A Covenant and Agreement, executed by CC&F Western Development Company, Inc., in favor of the City of Los Angeles, and recorded January 24, 1975 as Instrument No. 2984 in Book M-84902 Page 367, Official Records.

Said Covenant and Agreement, among other things, provides for the following:

Said first party covenants and agrees to and with said City of Los Angeles to sumbit four copies of a parking area and driveway plan over the above

described property to the appropriate district office of the Bureau of Engineering for approval and for coordination and review of the Traffic Department and the Department of Building and Safety, prior to the issuance of building permits.

This covenant and agreement shall run with the land and be binding upon any future owners, encumbrancers, their successors, heirs or assignees, and shall continue in effect unless otherwise released by authority of the Bureau of Engineering of the City of Los Angeles.

4. Covenants, conditions and restrictions (deleting therefrom any restrictions based on race, color or creed), as provided in a document recorded March 28, 1975 as Instrument No. 3857, Official Records.

Said covenants, conditions and restrictions provide that a violation thereof shall not defeat or render invalid the lien of any mortgage or deed of trust made in good faith and for value.

Said covenants, conditions and restrictions were purportedly modified by an instrument recorded September 26, 1975 as Instrument No. 684, in Book M-5124 Page 766; September 26, 1975 as Instrument No. 690 in Book M-5124 Page 813, Official Records; June 14, 1977 as Instrument No. 77-621940, Official Records and June 14, 1977 as Instrument No. 77-621943, Official Records.

5. A Covenant and Agreement, executed by C.C & F. Western Development Co., Inc., in favor of the City of Los Angeles, and recorded September 23, 1975 as Instrument No. 3724 in Book M-5121 Page 343, Official Records.

Said Covenant and Agreement, among other things, provides for the following:

In consideration of the issuance by the City of Los Angeles of a Building permit for the construction of an oversized building of said property, we do hereby covenant and agree to and with said City, pursuant to Section 91.0506 (K) of the Los Angeles Municipal Code, to maintian on said property, a yard of 60 feet in width, unobstructed from ground to sky, as shown on the attached plot plan.

This covenant and agreement shall run with the land and shall be binding upon ourselves, any future owners encumbrancers, their successors, heirs or assignees and shall continue in effect so long as said oversized building shall remain thereon and unless otherwise released by authority of the Superintendent of Building of the City of Los Angeles.

6. An easement for railroad, transportation and community purposes and incidental purposes in favor of Southern Pacific Transportation Company, a Delaware corporation, as provided in a document recorded March 2, 1976 as Instrument No. 561, Official Records.

Affects: that portion of said land described as follows:

That certain real property situated in the City of Los Angeles, County of Los Angeles, State of California said property being that portion of the following described strip of land which lies within Lot 1 as said Lot is shown on that certain map entitled "Tract No. 32036" recorded in Book 851 Pages 12, 13 and 14, Official Records of said County, being more particularly described as a strip of land 25 feet in width lying 10 feet Westerly and 15 feet Easterly of the portion of the following described line which lies within said Lot 1.

Beginning at the point of intersection of the Northerly line of said Lot 1 with a line parallel with and perpendicularly distant 15.00 feet Easterly of the Westerly line of said Lots 1 and 6; thence from said point of beginning Southerly along said parallel line South 0° 04' 36" East 335.00 feet to the true point of beginning of the property herein described:

Thence from said true point of beginning and continuing on said parallel line South 0° 04' 36" East 1932.76 feet; thence tangent to the preceding course in the arc of a curve to the left having a radius of 385.24 feet a central angle of 8° 57' 55" an arc distance of 60.28 feet; thence non-tangent to the preceding curve South 10° 59' 47" East 87.96 feet; thence non-tangent to the preceding course from a tangent which bears South 9° 02' 31" East Southerly on the arc of a curve to the right having a radius of 338.27 feet and a central angle of 13° 38' 41" an arc length of 8056 feet to the Southerly line of said Lot 6; thence continuing on said 338.27 foot radius curve through a central angle of 78° 54' 46" an arc length of 465.89 feet; thence tangent to the preceding curve South 83° 30' 56" West 50.00 feet to an intersection with a line parallel with and perpendicularly distant 15.00 feet Northerly of the Southerly line of Lot 12 as said Southerly line is shown on that certain map entitled Tract No. 4671 recorded in Book 56 at Pages 30 and 31, Official Records of said County; thence Westerly along said parallel line South 89° 52' 56" West 48.00 feet; thence tangent to the preceding course on the arc of a curve to the right having a radius of 338.27 feet a central angle of 52° 52' 48" an arc distance of 312.20 feet to the Westerly line of said Lot 12, said property being contiguous at its Southerly terminus of the Northerly line of said Lot 6.

NOTE: That portion of the above described line which lies Northerly of the Southerly terminus of the course South 10° 59' 47" East 87.96 feet is not necessarily centerline of the proposed tract.

7. An easement for railroad, trasnportation, communication etc. and incidental purposes in favor of C C & F Willowdale Western Properties, as provided in a document recorded August 17, 1976 as Instrument No. 60, Official Records.

Affects: as described therein

8. An easement for railroad drill track, spur track, transportation, communication, storm drainage and related purposes and incidental purposes in

favor of Amoco Chemicals Corporation, a Delaware corporation, as provided in a document recorded August 30, 1979 as Instrument No. 79-965941, Official Records.

Affects: a strip of land 30 feet in width lying 15 feet on the West side and 15 feet on the East side of the following described line which lies within said Parcel A, 30 feet in width lying 15 feet on each side of the following described line which lies within said 100 foot right-of-way and 25 feet in width lying 10 feet to the right of and 15 feet to the left, in the direction of traverse, of said following described line which lies within said Parcel B, said Parcel C and said Lot 6 and 30 feet in width lying 15 feet on each side of the Easterly 460.03 feet of that portion of said following described line which lies within said Lot 12 and said Lot 13 and lying 15 feet right and 11 feet left in the direction of traverse of the Westerly 293.04 feet of said following described line which lies within the above-mentioned Lot 12 and Lot 13; said line being more particularly described as follows:

Beginning at the point of intersection of the Northerly line of said Parcel A of said Parcel Map L.A. No. 3041, with a line parallel with and perpendicularly distant 15.00 feet Easterly of the Westerly line of said Parcel A, said Parcel B of said Parcel Map L.A. No. 3463, said Parcel C of said Parcel Map L.A. No. 3041 and said Lot 6 of said Tract No. 32036; thence from said Point of Beginning Southerly along said parallel line South 0° 04' 36" East 2267.76 feet; thence tangent to the preceding course on the arc of a curve to the left having a radius of 385.24 feet a central angle of 8° 57' 55" an arc distance of 60.28 feet; thence non-tangent to the preceding course South 10° 59' 47" East 87.96 feet; thence non-tangent to the preceding course from a tangent which bears South 0° 02' 31" East Southerly on the arc of a curve to the right having a radius of 338.27 feet a central angle of 92° 33' 27" an arc distance of 546.45 feet; thence tangent to the preceding curve South 83° 30' 56" West 50.00 feet to an intersection with a line parallel with and perpendicularly distant 15.00 feet Northerly of the Southerly line of said Lot 12; thence Westerly along said parallel line South 89° 52' 56" West 48.00 feet; thence tangent to the preceding course on the arc of a curve to the right having a radius of 338.27 feet a central angle of 49° 38' 05" an arc distance of 293.04 feet to the Easterly line of an easement for street purposes as described in Instrument No. 3338, recorded October 1, 1971 in Book D-5211 Page 313 of Deeds, Official Records of said County, and the terminus of the herein described strip, said easement being contiguous at its Northerly terminus with the Northerly line of said Parcel A of said Parcel Map L.A. No. 3041 and at its Westerly terminus with said Easterly line of said Easement for street purposes.

EXCEPTING therefrom that portion which lies within the Southerly 4.00 feet of said Lot 12.

9. A deed of trust to secure an indebtedness of $1,850,000.00, and any other amounts as therein provided, recorded August 17, 1976 as Instrument No. 64.

Dated:	July 27, 1976
Trustor:	Intset Investment Group, a General Partnership
Trustee:	United California Bank, a California corporation
Beneficiary:	United California Bank, a California corporation

10. A Covenant and Agreement, executed by Amcena Properties, Inc., in favor of the City of Los Angeles, and recorded January 9, 1986 as Instrument No. 86-031432, Official Records.

Said Covenant and Agreement, among other things, provides for the following:

"We do hereby covenant and agree to and with said City to maintain a yard of 30 feet in width along the full common property line (our North property line).

This covenant and agreement shall run with the land and be binding upon any future owners, encumbrancers, their successors, heirs or assignees, and shall continue in effect until the Advisory Agency of the City of Los Angeles approves its termination.

11. A document entitled "Agreement", dated December 19, 1985, executed by and between R. R. Donnelley & Sons Company, a Delaware corporation and Amcena Properties, Inc., a corporation, and recorded January 13, 1986 as Instrument No. 86-043898, Official Records.

Which recites in part:

"Donnelley is executing a Covenant and Agreement Regarding Maintenance of Building (the "Donnelley Covenant") whereby Donnelley agrees to maintain a yard of 30 feet in width along the full common property line with the Amcena Property.

In consideration of Amcena executing a Covenant and Agreement Regarding Maintenance of Building whereby Amcena also agrees to maintain on the Amcena Property a yard of 30 feet in width along the full common property line with the Donnelley Property, Donnelley further covenants and agrees with Amcena that it will not request the release of the Donnelley Covenant by the City of Los Angeles without the prior written consent of Amcena or the then owner of the Amcena Property.

This Agreement shall run with the Donnelley Property and shall be binding upon Donnelley and all further owners of the Donnelley Property, their successors, heirs or assigns.

NOTE NO. 1: THIS COMPANY DOES REQUIRE CURRENT BENEFICIARY DEMANDS PRIOR TO CLOSING. If the demand is expired and a current demand cannot be obtained, our requirements will be as follows:

1. If this company accepts a verbal update on the demand, we will hold an amount equal to one monthly mortgage payment. This hold will be up and above the verbal hold the lender may have stipulated.

2. If this company cannot obtain a verbal update on the demand, we will either pay off of the expired demand, or wait for the amended demand, at the discretion of the escrow.

NOTE NO. 2: The premium for a policy of title insurance, if issued, will be based on the basic rate.

NOTE NO. 3: This report is incomplete as to the effect of documents, proceedings, liens, decrees or other matters which do not specifically describe said land, but which, if any do exist, may affect the title or impose liens or encumbrances thereon.

This company will require statement(s) of information, including a declaration of marital status, from all parties, in order to complete this report.

This company will also require that the spouse(s), if any, of the vestee(s) and/or purchaser(s) either:

1. Join in the execution of any instruments conveying or encumbering said real property.

2. Deed any possible interest in and to said land.

Plats enclosed/ jlh /ods

ALTA REPORT

We wish to report the following items, relating to the issuance of an American Land Title Association Loan Policy:

1. The following is reported for information only. The only conveyances affecting said land recorded within six (6) months of the date of this report are as follows:

Nil.

2. An inspection of said land has been ordered; upon its completion we will advise you of our findings.

CLTA PRELIMINARY REPORT FORM
EXHIBIT "A"

CALIFORNIA LAND TITLE ASSOCIATION
STANDARD COVERAGE POLICY - 1973
(AMENDED 12-6-85 and 2-20-86)
SCHEDULE OF EXCLUSIONS FROM COVERAGE

This policy does not insure against loss or damage, nor against costs, attorneys' fees or expenses, any or all of which arise by reason of the following:

PART I

1. Taxes or assessments which are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the public records.
Proceedings by a public agency which may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the public records.
2. Any facts, rights, interests or claims which are not shown by the public records but which could be ascertained by an inspection of the land or by making inquiry of persons in possession thereof.
3. Easements, liens or encumbrances, or claims thereof, which are not shown by the public records.
4. Discrepancies, conflicts in boundary lines, shortage in area, encroachments, or any other facts which a correct survey would disclose, and which are not shown by the public records.
5. (a) Unpatented mining claims; (b) reservations or exceptions in patents or in Acts authorizing the issuance thereof; (c) water rights, claims or title to water, whether or not the matters excepted under (a), (b) or (c) are shown by the public records.
6. Any right, title, interest, estate or easement in land beyond the lines of the area specifically described or referred to in Schedule A, or in abutting streets, roads, avenues, alleys, lanes, ways, or waterways, but nothing in this paragraph shall modify or limit the extent to which the ordinary right of an abutting owner for access to a physically open street or highway is insured by this policy.
7. Any law, ordinance or governmental regulation (including but not limited to building and zoning ordinances) restricting or regulating or prohibiting the occupancy, use or enjoyment of the land, or regulating the character, dimensions or location of any improvement now or hereafter erected on the land, or prohibiting a separation in ownership or a change in the dimensions or area of the land or any parcel of which the land is or was a part, whether or not shown by the public records at Date of Policy, or the effect of any violation of any such law, ordinance or governmental regulation, whether or not shown by the public records at Date of Policy.
8. Rights of eminent domain or governmental rights of police power unless notice of the exercise of such rights appears in the public records.
9. Defects, liens, encumbrances, adverse claims, or other matters (a) whether or not shown by the public records at Date of Policy, but created, caused, suffered, assumed or agreed to by the insured claimant; (b) not shown by the public records and not otherwise excluded from coverage but known to the insured claimant either at Date of Policy or at the date such claimant acquired an estate or interest insured by this policy or acquired the insured mortgage and not disclosed in writing by the insured claimant to the Company prior to the date such insured claimant became an insured hereunder; (c) resulting in no loss or damage to the insured claimant; (d) attaching or created subsequent to Date of Policy; or (e) resulting in loss or damage which would not have been sustained if the insured claimant had been a purchaser or encumbrancer for value without knowledge.

AMERICAN LAND TITLE ASSOCIATION LOAN POLICY - 1970
WITH A.L.T.A. ENDORSEMENT FORM 1 COVERAGE
(AMENDED 10-17-70 and 10-17-84)
SCHEDULE OF EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy:

1. Any law, ordinance or governmental regulation (including but not limited to building and zoning ordinances) restricting or regulating or prohibiting the occupancy, use or enjoyment of the land, or regulating the character, dimensions or location of any improvement now or hereafter erected on the land, or prohibiting a separation in ownership or a reduction in the dimensions or area of the land, or the effect of any violation of any such law, ordinance or governmental regulation.
2. Rights of eminent domain or governmental rights of police power unless notice of the exercise of such rights appears in the public records at Date of Policy.
3. Defects, liens, encumbrances, adverse claims, or other matters (a) created, suffered, assumed or agreed to by the insured claimant; (b) not known to the Company and not shown by the public records but known to the insured claimant either at Date of Policy or at the date such claimant acquired an estate or interest insured by this policy or acquired the insured mortgage and not disclosed in writing by the insured claimant to the Company prior to the date such insured claimant became an insured hereunder; (c) resulting in no loss or damage to the insured claimant; (d) attaching or created subsequent to Date of Policy (except to the extent insurance is afforded herein as to any statutory lien for labor or material or to the extent insurance is afforded herein as to assessments for street improvements under construction or completed at Date of Policy).
4. Unenforceability of the lien of the insured mortgage because of failure of the insured at Date of Policy or of any subsequent owner of the indebtedness to comply with applicable "doing business" laws of the state in which the land is situated.

CLTA PRELIMINARY REPORT FORM
EXHIBIT "A" (continued)

AMERICAN LAND TITLE ASSOCIATION OWNER'S POLICY FORM B - 1970
(AMENDED 10-17-70)
SCHEDULE OF EXCLUSIONS FROM COVERAGE

1. Any law, ordinance or governmental regulation (including but not limited to building and zoning ordinances) restricting or regulating or prohibiting the occupancy, use or enjoyment of the land, or regulating the character, dimensions or location of any improvement now or hereafter erected on the land, or prohibiting a separation in ownership or a reduction in the dimensions or area of the land, or the effect of any violation of any such law, ordinance or governmental regulation.
2. Rights of eminent domain or governmental rights of police power unless notice of the exercise of such rights appears in the public records at Date of Policy.
3. Defects, liens, encumbrances, adverse claims, or other matters (a) created, suffered, assumed or agreed to by the insured claimant; (b) not known to the Company and not shown by the public records but known to the insured claimant either at Date of Policy or at the date such claimant acquired an estate or interest insured by this policy and not disclosed in writing by the insured claimant to the Company prior to the date such insured claimant became an insured hereunder; (c) resulting in no loss or damage to the insured claimant; (d) attaching or created subsequent to Date of Policy; resulting in loss or damage which would not have been sustained if the insured claimant had paid value for the estate or interest insured by this policy.

AMERICAN LAND TITLE ASSOCIATION
RESIDENTIAL TITLE INSURANCE POLICY - 1979
EXCLUSIONS

In addition to the exceptions in Schedule B, you are not insured against loss, costs, attorneys' fees and expenses resulting from:

1. Governmental police power; and the existence or violation of any law or government regulation. This includes building and zoning ordinances and also laws and regulations concerning:
   .land use
   .improvements on the land
   .land division
   .environmental protection

This exclusion does not limit the zoning coverage described in Items 12 and 13 of Covered Title Risks.

2. The right to take the land by condemning it, unless a notice of taking appears in the public records on the Policy Date.

3. Title Risks:
   .that are known to you, but not to us, on the Policy Date - unless they appeared in the public records.
   .that result in no loss to you
   .that first affect your title after the Policy Date - this does not limit the labor and material lien coverage in Item 8 of Covered Title Risks

4. Failure to pay value for your title.

5. Lack of a right:
   .to any land outside the area specifically described and referred to in Item 3 of Schedule A or
   .in streets, alleys, or waterways that touch your land.

This exclusion does not limit the access coverage in Item 5 of Covered Title Risks.

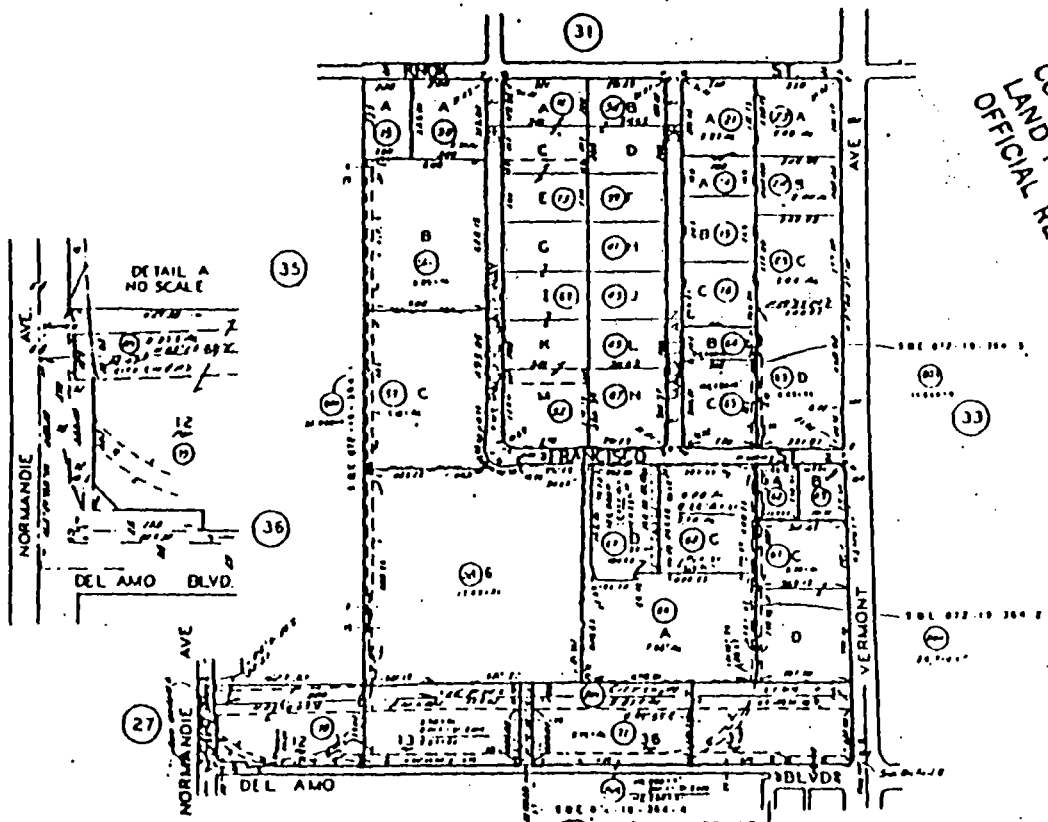
Real Estate Information

1.800.527.9663

7351 34

SCALE 1" = 400'

301 000015



THIS IS NOT A SURVEY OF THE LAND BUT IS COMPILED FOR INFORMATION OF THE COMMONWEALTH LAND TITLE COMPANY FROM DATA SHOWN BY THE OFFICIAL RECORDS.

PARCEL MAP	P. M. 129-23	PARCEL MAP	P. M. 68-71
PARCEL MAP	P. M. 79-18-19	PARCEL MAP	P. M. 76-14
PARCEL MAP	P. M. 67-94-95	PARCEL MAP	P. M. 63-99
PARCEL MAP	P. M. 68-69-70	TRACT NO. 32036	M. B. 851-12-14
PARCEL MAP	P. M. 62-64	PARCEL MAP	P. M. 61-81-82
TRACT NO. 4671	M. B. 56-30-31		
PARCEL MAP	P. M. 61-79-80		

CODE 310

FOR PREV. ASSM'T SEE:

ASSESSOR'S MAP
COUNTY OF LOS ANGELES, CALIF.

7351

SCALE 1"

KNOX ST.

CORE - SUPERFUND SITES

1. AERODYNAMICS PLATING CO. INC. - GARDENA
2. AEROTRON SUPPLY INC. - GARDENA
3. AIR PRODUCTS + CHEM. INC. CARSON
4. ALADDIN PLASTICS INC. - GARDENA
5. ALAMEDA ST. SAN LDFL - CARSON
6. AMERICAN HONDA MOTOR - TORRANCE
7. AMOCO CHEMICALS CORP - TORRANCE
8. ANGELUS PLATING WORKS - GARDENA
9. ASSOC. SPRING - GARDENA
10. AUTOMATED ETCHING CO. GARDENA
11. AVALON STAPLE MFG. - GARDENA
12. BEE CHEMICAL CO. - GARDENA
13. BORDEN CHEM. - CARSON
14. CAL COMPACT - CARSON
15. CAST RITE - GARDENA
16. ? LOCATION - COAST PLATING - GARDENA
17. CONTINAL PLATING (NOM) - GARDENA
18. D+M MACHINE - - TORRANCE
19. DE-BEST MFG. (NOM) - CARSON
20. DEGREWATER CHEM (NOM) - CARSON
21. DOW CHEM - TORRANCE
22. EDON NATIONAL STEEL - TORRANCE
23. ELECTRO BLEACH (NOM) - GARDENA
24. ELECTRONIC PLATING (N.O.M.) - GARDENA
25. GARDENA SURGI (N.O.M) - GARDENA
26. GARDENA VALLEY LANDFILL (N.O.M) CARSON
27. GOLDEN EAGLE REFINING (N.O.M.) - CARSON
28. GOLDEN STATE RUBBER & LATEX (N.O.M) - GARDENA
29. INDUSTRIAL MOLDING (N.O.M) - GARDENA
30. INDUSTRIAL MOLDING - TORRANCE
31. INDUSTRIAL PRECISION CHEM - CARSON
32. INDUSTRIAL TUBE CORP. - CARSON

301 000016

(33) INTERWEB/RR DONNELLEY & SONS CO. — TORRANCE
(34) INTL ANODIZING CORP. OF CA. — TORRANCE
(35) JOHNS MANVILLE PLT (N.O.M.) — CARSON
(36) KELLOG SUPPLY INC. (N.O.M) — CARSON
(37) LAWSON ENTERPRISES — TORRANCE
(38) LIQUID CHEM. CORP. (N.O.M) — CARSON
(39) LOS ANG. CO. SAN. DIST. JOINT WPCP (— CARSON
(40) MARTIN ADAMS DUMP — (N.O.M) — CARSON
(41) MECHANICAL METAL FINISHING (— GARDENA
(42) MERAL OG INC (N.O.M) — GARDENA
(43) MOBIL OIL CORP — TORRANCE
(44) MODERN HEAT TREATING CO. (~~[illegible]~~) — GARDENA
(45) MOEN FOAM CO. — CARSON
(46) MONTROSE CHEM. CORP — TORRANCE
(47) PACIFIC BRENCE NEODANE CO. INC. (A.L.O.M) — TORRANCE
(48) PACIFIC SMELTING CO. — TORRANCE
(49) PARKER IND. DIV. ETC. (N.O.M) — CARSON
(50) RATE PROCESSING (N.O.M) — GARDENA
(51) RAM CHEM (N.O.M) — GARDENA
(52) REX PRECISION PROD. INC. (N.O.M) — GARDENA
(53) REYNOLDS METALS CO. — TORRANCE
(54) ~~[illegible]~~ SHELL OIL CO. DOMINGUEZ FAC. — CARSON
(55) SOIL MGMT METRO INC. (N.O.M) — CARSON
(56) SONIC PLATING (N.O.M) — GARDENA
(57) SOUTHWEST CONSERVATION (~~[illegible]~~) — CARSON
(58) SPERRY REMINGTON — TORRANCE
(59) STANFER CHEMICAL CO. — CARSON
(60) TED HAMMETT (N.O.M) — CARSON
(61) TORRANCE LANDFILL (A.L.O.M) — TORRANCE
(62) TREE ISLAND STEEL (N.O.M) — CARSON
(63) TYLAN CORP. — TORRANCE
(64) UNION CARBIDE — TORRANCE
(65) VENUS LABORATORIES — CARSON

(66) VICTORIA GOLF COURSE — CARSON
(67) VINCO MANUFACTURING CO. (N.O.M) — GARDENA
(68) WATSON CANON + CALM (N.O.M) — CARSON
(69) WERDIN DUMP (A.L.O.M) — CARSON
(70) WESTERN AIR COMPRESSOR CO. — TORRANCE
(71) WESTERN CONCRETE STRUCTURE (N.O.M) — CARSON
(72)

(L-1) U.S. STEEL — TORRANCE
(L-2) ROYAL BLVD. STEEL — CARSON
(L-3) AMERICAN STANDARD INC. (A.L.O.M) — TORRANCE
(L-4) DOLORES ST. DISPOSAL SITE — CARSON
(L-5) BROADWAY-MAIN LANDFILL — CARSON
(L-6) SOUTHWEST CONSERVATION INC. (A.R.O.M) — CARSON
(L-7) GARDENA VALLEY — CARSON
(L-8)

301 000017A

0639-0259)

October 7, 1988

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California

Project No: 10221-00
Report No: 8-0368

Attention: Mr. Raul Ramirez

Subject: Preliminary Results of an Environmental Assessment of the South Bay Warehouse Facility
Pacific Gateway Drive
Torrance, California

Gentlemen:

Pursuant to our recent conversations regarding an environmental assessment at the subject property, this letter is to inform you that an area of subsurface contamination has been found. During drilling operations for a geotechnical (foundation) investigation, our field geologist noted a possible petroleum hydrocarbon odor in Boring Number B-3. This boring is located near the northwest corner of the site. First phase laboratory analysis of a soil sample collected from this boring showed concentrations of petroleum hydrocarbons of 850 mg/kg. Additional analyses of this sample are currently being conducted to determine the individual constituents of the hydrocarbons identified in this sample. In the time between drilling operations and now, it has been determined that a clarifier exists at or near the location of B-3. At your direction, we are currently in the process of scheduling drilling equipment to further investigate the horizontal and vertical extent of the contamination and we anticipate implementing the drilling on Monday, October 10, 1988.

In terms of the ramifications of the finding of this clarifier and apparently related soil contamination, there will be a cost to someone associated with this site to remove the clarifier and in some way mitigate all resulting contaminated materials. This mitigation is in accordance with current Federal, State, and local guidelines regulating contamination of this nature. We recommend that Coca-Cola address this issue in their transaction to purchase

October 7, 1988

this site. We will keep you informed of all results as this investigation progresses. If you have any questions, please call.

Very truly yours,

STONEY-MILLER CONSULTANTS, INC.

Gary T. Carlin
Consulting Environmental Geologist

GTC:jz

0689-0259)

10221-00
8-0368

OCTOBER 7, 1988

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California

Attn: Mr. Raul Ramirez

Subject: Preliminary results of an Environmental Assessment of the South Bay Warehouse Facility, Pacific Gateway Drive, Torrance, California.

Gentlemen:

Pursuant to our recent conversations regarding an environmental assessment at the subject property, this letter is to inform you that an area of subsurface contamination has been found. During drilling operations for a geotechnical (foundation) investigation, our field geologist noted a possble petroleum hydrocarbon odor in Boring Number B-3. This boring is located near the northwest corner of the site. First phase laboratory analysis of a soil sample collected from this boring showed concentrations of petroleum hydrocarbons of 850 mg/kg. Additional analyses of this sample are currently being conducted to determine the individual constituents of the hydrocarbons identified in this sample. In the time between drilling operations and now, it has been determined that a clarifier exists at or near the location of B-3. At your direction, we are currently in the process of scheduling drilling equipment to further investigate the horizontal and vertical extent of the contamination and we anticipate implementing the drilling on Monday 10/10/88.

In terms of the ramifications of the finding of this clarifier and apparently related soil contamination, there will be a cost to someone associated with this site to remove the clarifier and in some way mitigate all resulting contaminated materials. This mitigation is in accordance with current federal State and Local guidelines regulating contamination of this nature. We recommend that Coca-Cola address this issue in ~~your~~ their transaction to purchase this site. We will keep you informed of all results as this investigation progresses. If you have any questions, please call.

Very Truly Yours

Gary T. Carlin
Consulting Environmental Geologist

301 000020

0639-0259)

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

October 27, 1988

Mr. Miles P. Fischer

Subject: Letter of transmittal for a letter to Coca Cola regarding the status of an ongoing Environmental Assessment of the South Bay Warehouse Facility, Pacific Gateway Drive, Torrance, California.

Dear Mr. Fischer:

At the direction of Mr. Raul Ramirez of Coka Cola Enterprises, Stoney-Miller Consultants, Inc. is transmitting the attached letter. If you have any questions, please call.

Very Truly Yours,

Stoney-Miller Consultants, Inc.

Gary T. Carlin
Consulting Environmental Geologist

cc: Mr. Raul Ramirez
Mr. Paul Schlarman
Mr. Daniel Herscher
Ms. Joy Crose

301 000021

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

October 26, 1988

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California

Project No: 10221-00
Report No: 8-0390

Attn: Mr. Raul Ramirez

Subject: Update of findings regarding an ongoing Environmental Assessment of the South Bay Warehouse Facility, Pacific Gateway Drive, Torrance, California.

Gentlemen:

The purpose of this letter is to update Coca-Cola Enterprises regarding the ongoing environmental assessment on the subject site. As referenced in our letter of October 7, 1988, subsurface contamination has been found at the site. Stoney-Miller Consultants Inc. (SMC) has recently conducted additional limited subsurface investigation in this area of the site to determine if the contamination is a localized problem or more general. Two general conclusions that we can make at this time regarding the contamination issue are as follows:

- o A portion of the subsurface contamination extends to the eastern property line adjacent to the rail road tracks; and

- o Based on results of laboratory analyses, the depth of contamination appears to be shallow, (i.e zero to 8 feet deep). Clean samples have been collected below these depths.

SMC does not know the horizontal extent of this contamination at this time. An understanding of the extent of contamination will require additional drilling and sampling. Due to the relatively shallow nature of the contamination, extensive deep drilling is not anticipated.

Another area of concern regarding this matter, involves the close proximity of a number of Environmental Protection Agency superfund sites. Our records indicate five EPA syuperfund sites within a few blocks of the subject project, including without limitation the adjacent property to the north owner by RR Donnelly. SMC is currently attempting to obtain more specific data regarding the nature of any contamination that might be associated with these superfund sites. However, we are experiencing difficulty obtaining the information in a timely manner, due to government regulatory protocol regarding issues of this matter. At this point we have discovered that the State Of

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

October 26, 1988

Project No: 10221-00
Report No: 8-0390
Page No: 2

California Department Of Health Services has a file on four of the five sites in question and has conceded us an appointment to review these files on Monday, October 31. It is SMC's position that we can not properly advise you of the types of risks Coca Cola might be accepting regarding the purchase of the subject site until we have had an opportunity to review these files.

If you have any questions regarding this matter, please call.

Very Truly Yours,

Stoney-Miller Consultants, Inc.

Gary T. Carlin
Consulting Environmental Geologist

GTC:jz

A Plus

Office Products & Services
COMMERCIAL SPECIALISTS
10 HUGHES STREET
SUITE A-105
IRVINE, CALIFORNIA 92718
(714) 837-5070
FAX: (714) 830-8239

FACSIMILE TRANSMISSION SHEET

DATE 3/3/89

TO Neil Allen
Ancon Environmental

FROM Stoney - Miller Consultants, Inc.

REGARDING Coca Cola

NUMBER OF PAGES TO FOLLOW:

CALL IF YOU DO NOT RECEIVE ALL OF THIS TRANSMISSION.

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

DRAFT

October 13, 1989

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California 90021

Project No: 10221-00
Report No: 9-0931

Attention: Mr. Raul Ramirez

Subject: Distribution of Environmental Consulting Services Charges for Work Conducted Relative to Subsurface Contamination Beneath the Previously Existing Building and Outside the Previously Existing Building at Your Carson, California, Facility on Pacific Gateway Drive.

Gentlemen:

Pursuant to your request, Stoney-Miller Consultants, Inc., has prepared this letter to assist Coca-Cola Enterprises in establishing the distribution of Environmental Consulting Services charges at the subject site. It is our understanding, based on prior conversations with Mr. Raul Ramirez, that the seller is, to a limited extent, financially responsible for all incurred expenses relative to contamination found beneath the previously existing building, and that Coke is responsible for other contamination outside the building area. It is also our understanding that the information provided in this letter will be utilized to establish the seller's and Coca-Cola Enterprises' financial responsibility for the costs that have been incurred to date. Stoney-Miller Consultants has separated these costs into three categories as follows:

1. Consulting services costs incurred prior to any investigation or removal operations conducted beneath the building.

2. Consulting services costs incurred for contaminated soil removed from beneath the previously existing building.

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

2A. Consulting services costs incurred for investigative procedures conducted (generally consisting of drilling, sampling, technical direction) to determine if any additional contaminated soil was at the site.

Further explanations and an estimate of the division of the related costs incurred are provided below.

Category

1 This item includes costs incurred for all geotechnical services conducted and all environmental services conducted prior to May 22, 1989. This is the date, based on a review of our files, that removal operations began beneath the previously existing building. Based on our understanding of the distribution of financial responsibility, it is Stoney-Miller Consultant's opinion that Coca-Cola Enterprises is responsible for 100 percent of these costs. Our calculations indicate this amount to be $36,275.60.

2 & 2A Item 2 includes costs incurred for all environmental services included pursuant to the removal of contaminated soil after May 22, 1989. It is Stoney-Miller Consultant's opinion that approximately 50 percent of the removal effort was concentrated on soil from outside the building, and 50 percent of the effort was pursuant to the removal of soil from beneath the previously existing building.

Item 2A includes costs incurred for all environmental services for drilling and sampling to determine if additional contaminated soil exists, other than that quantity already established by the original investigation conducted prior to Coca-Cola Enterprises' purchase of the site. It is Stoney-Miller Consultants' opinion that, based on an evaluation of the depth number and location of borings drilled, 50 percent of the effort was pursuant to drilling outside the building, and 50 percent was utilized to drill beneath the existing building.

Based on our opinion that the distribution of costs from both items 2 and 2A are 50 percent for the seller and 50 percent for Coca-Cola Enterprises, no effort was made to separate the actual costs incurred for each item. Our calculations indicate the distribution of

DRAFT

October 13, 1989

financial responsibility for items 2 and 2A to be as follows:

Coca-Cola Enterprises:	$ 10,342.50
Seller:	$ 10,342.50

The majority of the costs invoiced to date have been paid in full by Coca-Cola Enterprises. The exception to this is that there are a few outstanding unpaid charges for services that have only recently been provided and invoiced. Stoney-Miller Consultants, Inc., hopes that the above information is useful in obtaining an agreement between Coca-Cola Enterprises and the seller. If you have any questions, please call.

Very truly yours,

STONEY-MILLER CONSULTANTS, INC.

Gary T. Carlin
Consulting Environmental Geologist

GTC:vlt

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

FACSIMILE TRANSMISSION SHEET

DATE: 7/10/89

TO: COCA COLA —
ATTN: MR. RAUL RAMIREZ

FROM: STONEY-MILLER CONSULTANTS
GARY CARLIN

SUBJECT: SUMMARY LETTER TO DOHS

NUMBER OF PAGES TO FOLLOW: 4

CALL IF YOU DO NOT RECEIVE ALL OF THIS TRANSMISSION

301 000028

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

STONEY-MILLER CONSULTANTS, INC.
GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

FACSIMILE TRANSMISSION SHEET

DATE: 10-13-89

TO: Paul Ramirez
Coca-Cola

FROM: Mike Miller

SUBJECT:

NUMBER OF PAGES TO FOLLOW:

3

CALL IF YOU DO NOT RECEIVE ALL OF THIS TRANSMISSION

301 000029

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

October 13, 1989

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California 90021

Project No: 10221-00
Report No: 9-0931

Attention: Mr. Raul Ramirez

Subject: Distribution of Environmental Consulting Services Charges for Work Conducted Relative to Subsurface Contamination Beneath the Previously Existing Building and Outside the Previously Existing Building at Your Carson, California, Facility on Pacific Gateway Drive.

Gentlemen:

Pursuant to your request, Stoney-Miller Consultants, Inc., has prepared this letter to assist Coca-Cola Enterprises in establishing the distribution of Environmental Consulting Services charges at the subject site. It is our understanding, based on prior conversations with Mr. Raul Ramirez, that the seller is, to a limited extent, financially responsible for all incurred expenses relative to contamination found beneath the previously existing building, and that Coke is responsible for other contamination outside the building area. It is also our understanding that the information provided in this letter will be utilized to establish the seller's and Coca-Cola Enterprises' financial responsibility for the costs that have been incurred to date. Stoney-Miller Consultants has separated these costs into three categories as follows:

1. Consulting services costs incurred prior to any investigation or removal operations conducted beneath the building.

2. Consulting services costs incurred for contaminated soil removed from beneath the previously existing building.

10:50 —

10221-00

9-0931

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California 90021

Attn: Mr. Raul Ramirez

Subject: Distribution of environmental consulting services charges for work conducted relative to subsurface contamination beneath the previously existing building and outside the previously existing building at your Carson, California facility on Pacific Gateway Drive.

Gentlemen:

Pursuant to your request, Stoney-Miller Consultants Inc. ~~(SMC)~~ has prepared this letter to assist Coca-Cola Enterprises ~~(Coke)~~ in establishing the distribution of Environmental Consulting Services charges at the subject site. It is our understanding, based on prior conversations with Mr. Raul Ramirez that the seller is, to a limited extent, financially responsible for all incurred expenses relative to contamination found beneath the previously existing building and that Coke is responsible for other contamination outside the building area. It is also our understanding that the information provided in this letter will be utilized to establish the seller's and Coke's financial responsibility for the cost that have been incurred to date. SMC has separated ~~the to date~~ THESE costs into three categories as follows:

1) Consulting services costs incurred prior to any investigation or removal operations conducted beneath the building.

2) Consulting services costs incurred for contaminated soil removed from beneath the previously existing building.

2A) Consulting services costs incurred for investigative procedures conducted (generally consisting of drilling, sampling, technical direction) to determine if any additional contaminated soil was at the site.

Further explanations and an estimate of the division of the related costs incurred are provided below.

<u>Category</u>

1 This item includes costs incurred for all geotechnical services conducted and all environmental services conducted prior to May 22, 1989. This is the date, based on a review of our files, that removal operations began beneath the previously existing building. Based on our understanding of the distribution of financial responsibility, it is SMC's

opinion that Coke is responsible for 100 percent of these costs. Our calculations indicate this amount to be $ 36,275.60

2 & 2A Item 2 includes costs incurred for all environmental services included pursuant to the removal of contaminated soil after May 22, 1889. It is SMC's opinion that approximately 50 percent of the removal effort was concentrated on soil from outside the building and 50 percent of the effort was pursuant to the removal of soil from beneath the previously existing building.

Item 2A includes costs incurred for all environmental services ~~included~~ for drilling and sampling ~~services~~ to determine if ~~any~~ additional contaminated soil exists, other that that quantity already established ~~in~~ by the original investigation conducted prior to Coke's purchase of the site. It is SMC's opinion that based on ~~the amount of effort provided and~~ an evaluation of the depth~~s~~ ~~and numbers~~ number and location of borings drilled, ~~that~~ 50 percent of the effort was pursuant to drilling outside the building and 50 percent was ~~for~~ pursuant to drilling beneath the ~~previously~~ existing building.

Based on our opinion that the distribution of costs from both items 2 and 2A are 50 percent for the seller and 50 percent for Coke, no effort was made to separate the actual costs incurred for each item. Our calculations indicate the distribution of financial responsibility for items 2 and 2A to be as follows:

Coke: $ 10,342.50

Seller: $ 10,342.50

The majority of the costs invoiced to date have been paid in full by Coke. The exception to this is that there are a few outstanding unpaid charges for services that have only recently been provided and invoiced. SMC hopes that the above information is useful in obtaining an agreement between Coke and the seller. If you have any questions please call.

Very Truly Yours
Stoney-Miller Consultants Inc.

Gary T. Carlin
Consulting Environmental Geologist

IMPORTANT MESSAGE

FOR Mike Miller

DATE 10/13/89 TIME _____ A.M. P.M.

M Ed Cieslak

OF _____

PHONE _____
AREA CODE NUMBER EXTENSION

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Our FAX is Down. Can you send This To Raul?

SIGNED Ed

LITHO IN U.S.A.

TOPS 3002-P

AMERICAN STANDARD OFFICE SUPPLY
(714) 837-8430

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California 90021

DRAFT

Attn: Mr. Raul Ramirez

Subject: Distribution of environmental consulting services charges for work conducted relative to subsurface contamination beneath the previously existing building and outside the previously existing building at your Carson, California facility on Pacific Gateway Drive.

Gentlemen:

Pursuant to your request, Stoney-Miller Consultants Inc. (SMC) has prepared this letter to assist Coca-Cola Enterprises (Coke) in establishing the distribution of Environmental Consulting Services charges at the subject site. It is our understanding, based on prior conversations with Mr. Raul Ramirez that the seller is to a limited extent financially responsible for all incurred expenses relative to contamination found beneath the previously existing building and that Coke is responsible for other contamination outside the building area. It is also our understanding that the information provided in this letter will be utilized to establish the seller's and Coke's financial responsibility for the cost that have been incurred to date. SMC has separated the to date costs into three categories as follows:

1) Consulting services costs incurred prior to any investigation or removal operations conducted beneath the building.

2) Consulting services costs incurred for contaminated soil removed from beneath the previously existing building.

2A) Consulting services costs incurred for investigative procedures conducted (generally consisting of drilling, sampling, technical direction) to determine if any additional contaminated soil was at the site.

Further explanations and an estimate of the division of the related costs incurred are provided below.

<u>Category</u>

1 This item includes costs incurred for all geotechnical services conducted and all environmental services conducted prior to May 22, 1989. This is the date, based on a review of our files, that removal operations began beneath the previously existing building. Based on understanding of the distribution of financial responsibility, it is SMC's

DRAFT

opinion that Coke is responsible for 100 percent of these costs. Our calculations indicate this amount to be $ 36,275.60

2 & 2A Item 2 includes costs incurred for all environmental services included pursuant to the removal of contaminated soil after May 22, 1889. It is SMC's opinion that approximately 50 percent of the removal effort was concentrated on soil from outside the building and 50 percent of the effort was pursuant to the removal of soil from beneath the previously existing building.

Item 2A includes cost incurred for all environmental services included for drilling and sampling services to determine if any contaminated soil exists, other that that quantity already established in the original investigation conducted prior to Coke's purchase of the site. It is SMC's opinion that based on the amount of effort provided and an evaluation of the depths and numbers of borings drilled, that 50 percent of the effort was pursuant to drilling outside and 50 percent was for drilling beneath the previously existing building.

DRAFT

Based on our opinion that the distribution of costs from both items 2 and 2A are 50 percent for the seller and 50 percent for Coke, no effort was made to separate the actual costs incurred for each item. Our calculations indicate the distribution of financial responsibility for items 2 and 2A to be as follows:

Coke: $ 10,342.50

Seller: $ 10,342.50

The majority of the costs invoiced to date have been paid in full by Coke. The exception to this is that there are a few outstanding unpaid charges for services that have only recently been provided and invoiced. SMC hopes that the above information is useful in obtaining an agreement between Coke and the seller. If you have any questions please call.

Very Truly Yours
Stoney-Miller Consultants Inc.

Gary T. Carlin
Consulting Environmental Geologist

0639-0259/

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

July 21, 1989

RECEIVED
JUL 24 1989

Mr. Michael J. Miller, P.E.
Stoney-Miller Consultants, Inc.
14 Hughes, Suite B-101
Irvine, California 92718

Attn: Gary Carlin

Dear Mr. Miller:

RECENTLY ACQUIRED PROPERTY OF COCA COLA ENTERPRISES IN THE CARSON-TORRANCE AREA OF THE CITY OF LOS ANGELES, CALIFORNIA AT 19875 PACIFIC GATEWAY DRIVE

We have completed our review of your letter report, hand delivered to this office on July 11, 1989 and have the following comments.

Your property lies about 1,300 feet north of the Del Amo Hazardous Waste Site. This site consists of waste disposal ponds and sumps that were used by a former synthetic rubber manufacturing complex. The types of wastes disposed in these ponds include volatile and semi-volatile organic substances such as benzene, styrene and naphthalene. It is believed that the complex covered the entire area bordered by 190th Street to the north, Del Amo Boulevard to the south, Normandie Avenue to the west, and Vermont Avenue and Hamilton Avenue to the east. Documents in our files indicate that there were manufacturing areas, underground and above ground tanks, underground lines, and possible sumps that may be sources of soil and ground water contamination. Soils and ground water beneath the Del Amo Site are contaminated by hazardous substances believed to have originated from the disposal ponds and sumps.

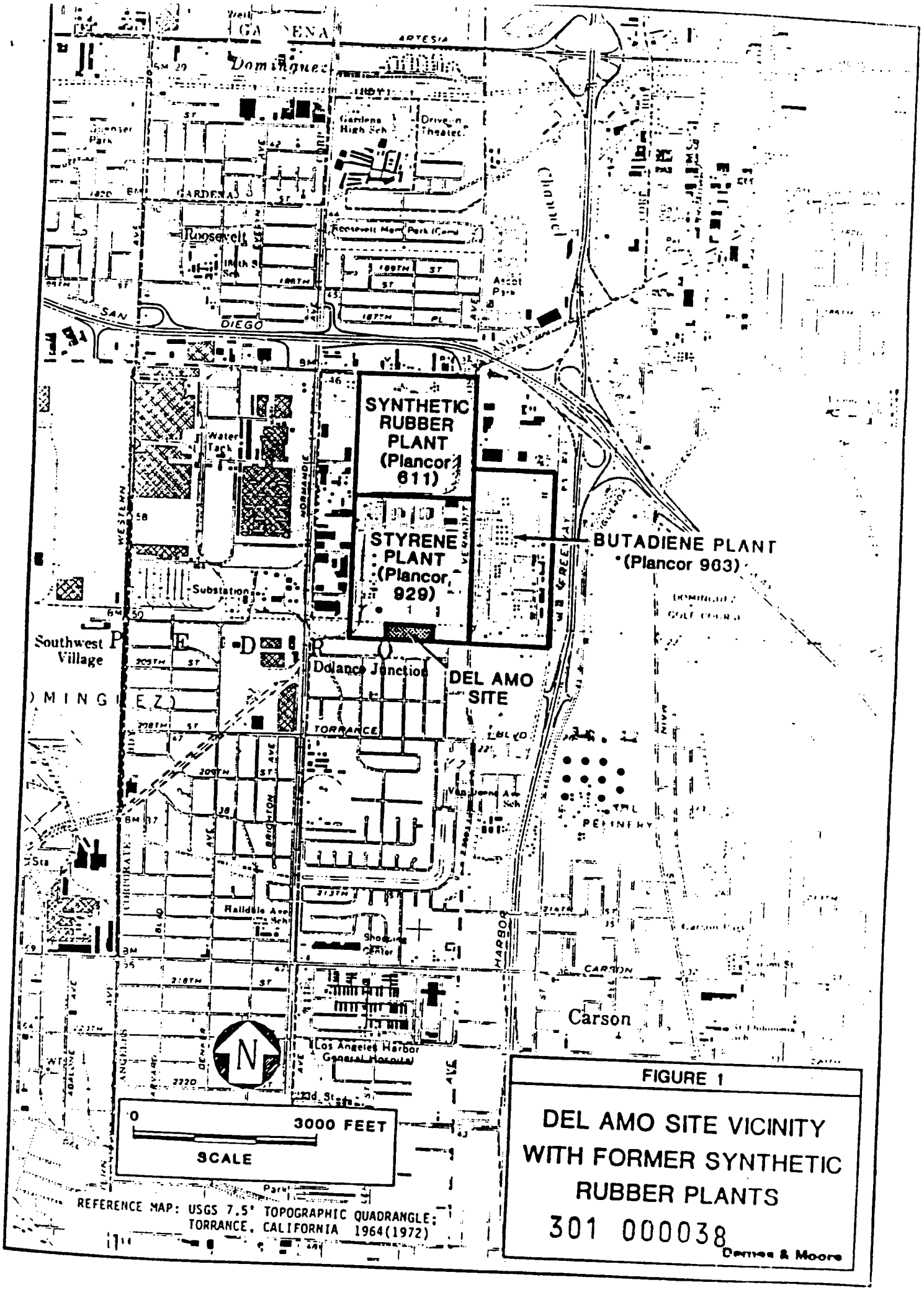
Because of the contaminant problems associated with the Del Amo disposal areas, we have referred the Site to the U.S. Environmental Protection Agency (EPA) for consideration for the National Priorities List. The Department of Health Services (DHS) Toxic Substances Control Division is also evaluating the entire area of the former rubber manufacturing complex as a source of ground water contamination. The high levels of napthalene and phenanthrene that you discovered at the subject location may be associated with the synthetic rubber manufacturing operations once conducted on your property because these same chemicals were also found at the Del Amo site. We suggest that you make a thorough historical search of your property to determine the types of past operations that may be causing the contamination. Should you have any plans to remediate the contamination on this property, this office would review those plans prior to proceeding.

If you have any questions, please contact Julia Bussey or Alice Gimeno at (213) 590-4856.

Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure



REFERENCE MAP: USGS 7.5' TOPOGRAPHIC QUADRANGLE; TORRANCE, CALIFORNIA 1964(1972)

FIGURE 1

DEL AMO SITE VICINITY WITH FORMER SYNTHETIC RUBBER PLANTS

301 000038

Dames & Moore

RESPONSIBLE PARTY-LEAD SITE CLEANUP WORKPLAN

DEL AMO BOULEVARD

I. Site Information

A. Location and Type of Site

Del Amo Boulevard
Between Vermont and Normandie
Torrance, CA 90502
Los Angeles

The site consists of waste disposal ponds that were used by a former synthetic rubber maunfacturing complex. The site operations ceased in the early 1970s and the disposal areas were covered over with soil and later sold to a series of land development corporations. Currently, the site is fenced and posted and there is little visual evidence of disposal activities.

B. Description of Hazardous Wastes

The disposal areas consisted of three large, shallow evaporation ponds and six sumps that were used from the mid-1950s until the mid-1960s for disposal of aqueous sludges produced during synthetic rubber manufacture. These ponds contain high levels of polynuclear aromatic hydrocarbons (PNAs) and lower levels of volatile organic compounds (VOCs).

Substances of concern that were found in various studies include benzene, toluene, ethylbenzene, dichlorobenzene, napthalene, acenaphthylene, acenapthene, fluorene, phenathrene, anthracene, fluoranthene, pyrene, beno(a)anthracene, chrysene, benzo(b)fluoranthene, benzo(a)pyrene, dibena(a,h)anthracene, ideno(1,2,3-c,d)pyrene, and benzo(ghi)perylene.

Shallow ground water beneath the site has been found to be contaminated with primarily volatile organic compounds, including benzene, and toluene.

C. Threat to Public Health and Environment

Although the disposal areas have been inactive for some time, residents are located within 500 feet of the site, and may be threatened by contaminants migrating in subsurface soils and ground water. Potential pathways for exposure include release of adverse air emissions during site disturbance, movement of contaminants from the perched water table to deeper drinking water aquifers, and migration of a static organic vapor plume to underlying residential areas. Under current, undisturbed conditions, the site has little impact upon local

air quality.

The degree of health hazard posed by chemical contamination of a site depends on the concentration of the material present and the duration of exposure. DHS policy is to evaluate all listed hazardous substance release sites for the need to take action to abate any acute public health or environmental threats posed by a site. Therefore, the threats described in this document generally represent the potential impact of long-term exposure to specific hazardous substances if: 1) the site is not abated, 2) the substances migrate offsite, and 3) the substances at some point come into contact with human or environmental receptors.

II. Site Status

A. Status of Site Activity

Site characterization studies were conducted by the land owner in 1984 and by the Department in 1986 and 1987. An agreement was signed by potential responsible parties (PRPs) to conduct a feasibility study for remediating the onsite soil contamination under DHS oversight. A ground water study by EPA was conducted mid-1988 to determine if substances released from the Del Amo Site were entering usable aquifers.

B. Projected Revenue Sources

The responsible parties have entered into an enforceable agreement with DHS for oversight/monitoring of their cleanup efforts. DHS has budgeted $200,000 for related direct costs. DHS will recover 100 percent of direct costs plus staff costs and overhead related to the project. DHS expects responsible parties to pay all costs associated with site cleanup.

III. Project Completion Estimates

The estimates shown below reflect completion of major site cleanup phases based on current information regarding this site and responsible party cleanup plans and completed actions.

Task Group	Estimated Completion
1. Site Characterization	
a) Remedial Action Order	March 1988
b) Remedial Investigation/ Feasibility Study	Oct. 1990
2. Remedial Action Plan	April 1991
3. Remedial Action	
a) Design	Oct. 1991
b) Implementation	April 1993
c) Certification	June 1993
4. Cost Recovery and/or Operation and Maintenance	
a) Cost Recovery	June 1994
b) Operation and Maintenance	10-15 yrs

301 000041

October 7, 1988

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California

Project No: 10221-00
Report No: 8-0368

Attention: Mr. Raul Ramirez

Subject: Preliminary Results of an Environmental Assessment of the South Bay Warehouse Facility
Pacific Gateway Drive
Torrance, California

Gentlemen:

Pursuant to our recent conversations regarding an environmental assessment at the subject property, this letter is to inform you that an area of subsurface contamination has been found. During drilling operations for a geotechnical (foundation) investigation, our field geologist noted a possible petroleum hydrocarbon odor in Boring Number B-3. This boring is located near the northwest corner of the site. First phase laboratory analysis of a soil sample collected from this boring showed concentrations of petroleum hydrocarbons of 850 mg/kg. Additional analyses of this sample are currently being conducted to determine the individual constituents of the hydrocarbons identified in this sample. In the time between drilling operations and now, it has been determined that a clarifier exists at or near the location of B-3. At your direction, we are currently in the process of scheduling drilling equipment to further investigate the horizontal and vertical extent of the contamination and we anticipate implementing the drilling on Monday, October 10, 1988.

In terms of the ramifications of the finding of this clarifier and apparently related soil contamination, there will be a cost to someone associated with this site to remove the clarifier and in some way mitigate all resulting contaminated materials. This mitigation is in accordance with current Federal, State, and local guidelines regulating contamination of this nature. We recommend that Coca-Cola address this issue in their transaction to purchase

October 7, 1988

Project No: 10221-00
Report No: 8-0368
Page No: 2

this site. We will keep you informed of all results as this investigation progresses. If you have any questions, please call.

Very truly yours,

STONEY-MILLER CONSULTANTS, INC.

Gary T. Carlin
Consulting Environmental Geologist

GTC:jz

October 13, 1989

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California 90021

Project No: 10221-00
Report No: 9-0931

Attention: Mr. Raul Ramirez

Subject: Distribution of Environmental Consulting Services Charges for Work Conducted Relative to Subsurface Contamination Beneath the Previously Existing Building and Outside the Previously Existing Building at Your Carson, California, Facility on Pacific Gateway Drive.

Gentlemen:

Pursuant to your request, Stoney-Miller Consultants, Inc., has prepared this letter to assist Coca-Cola Enterprises in establishing the distribution of Environmental Consulting Services charges at the subject site. It is our understanding, based on prior conversations with Mr. Raul Ramirez, that the seller is, to a limited extent, financially responsible for all incurred expenses relative to contamination found beneath the previously existing building, and that Coke is responsible for other contamination outside the building area. It is also our understanding that the information provided in this letter will be utilized to establish the seller's and Coca-Cola Enterprises' financial responsibility for the costs that have been incurred to date. Stoney-Miller Consultants has separated these costs into three categories as follows:

1. Consulting services costs incurred prior to any investigation or removal operations conducted beneath the building.

2. Consulting services costs incurred for contaminated soil removed from beneath the previously existing building.

2A. Consulting services costs incurred for investigative procedures conducted (generally consisting of drilling, sampling, technical direction) to determine if any additional contaminated soil was at the site.

Further explanations and an estimate of the division of the related costs incurred are provided below.

Category

1 This item includes costs incurred for all geotechnical services conducted and all environmental services conducted prior to May 22, 1989. This is the date, based on a review of our files, that removal operations began beneath the previously existing building. Based on our understanding of the distribution of financial responsibility, it is Stoney-Miller Consultant's opinion that Coca-Cola Enterprises is responsible for 100 percent of these costs. Our calculations indicate this amount to be $36,275.60.

2 & 2A Item 2 includes costs incurred for all environmental services included pursuant to the removal of contaminated soil after May 22, 1989. It is Stoney-Miller Consultant's opinion that approximately 50 percent of the removal effort was concentrated on soil from outside the building, and 50 percent of the effort was pursuant to the removal of soil from beneath the previously existing building.

Item 2A includes costs incurred for all environmental services for drilling and sampling to determine if additional contaminated soil exists, other than that quantity already established by the original investigation conducted prior to Coca-Cola Enterprises' purchase of the site. It is Stoney-Miller Consultants' opinion that, based on an evaluation of the depth number and location of borings drilled, 50 percent of the effort was pursuant to drilling outside the building, and 50 percent was utilized to drill beneath the existing building.

Based on our opinion that the distribution of costs from both items 2 and 2A are 50 percent for the seller and 50 percent for Coca-Cola Enterprises, no effort was made to separate the actual costs incurred for each item. Our calculations indicate the distribution of

financial responsibility for items 2 and 2A to be as follows:

Coca-Cola Enterprises:	$ 10,342.50
Seller:	$ 10,342.50

All of the above costs have been invoiced and paid in full by Coca-Cola Enterprises. There are a few outstanding unpaid charges for services that have only recently been provided and invoiced. Stoney-Miller Consultants, Inc., hopes that the above information is useful in obtaining an agreement between Coca-Cola Enterprises and the seller. If you have any questions, please call.

Very truly yours,

STONEY-MILLER CONSULTANTS, INC.

Michael J. Miller, G.E. 597
Geotechnical Engineer

MJM:vlt

Distribution: Addressee (2)

0639-0259

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

November 16, 1988

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California

Project No: 10221-00
Report No: 8-0417

Attn: Mr. Raul Ramirez

Subject: Interim Report of findings of an ongoing Environmental Assessment of the South Bay Warehouse Facility, Pacific Gateway Drive, Torrance, California.

Gentlemen:

1.0 INTRODUCTION

As you are aware Stoney-Miller Consultants, Inc. (SMC) has recently been retained to evaluate the environmental aspects of the subject property. [illegible] conducted a limited investigation to evaluate [illegible] the extent of relatively [illegible] subsurface contamination near the northwest corner of the site. [illegible] Interim Report [illegible] prepared to summarize [illegible] information. [illegible] this interim report are [illegible] explanation and presentations of:

- The sequence of events that caused SMC to discover the subsurface hydrocarbon contamination, i.e. background;
- A generalized description of the methods utilized to investigate the limits of hydrocarbon contamination;
- A generalized description of the laboratory analyses utilized during the investigation;
- A summary of the findings of the investigation; and
- A presentation of conclusions and recommendations to Coca Cola Enterprises.

301 000047

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

To protect Coca-Cola's interest in the transaction of purchasing the subject site, we recommend that a full scale investigation be conducted and a report prepared which is suitable for submittal to government regulatory agencies. This investigation and report should be sufficient in scope to provide Coca-Cola with an adequate understanding of the financial ramifications of purchasing a site that is known to have subsurface contamination. This Interim Report should only be considered as a means of conveying the general findings of the investigation of the subsurface hydrocarbon contamination found, to Coca Cola, a party that is not currently the owner of the site but, is interested in understanding the environmental liability that could be inherited by the purchase of the site.

2.0 BACKGROUND, AND INVESTIGATIVE PROCEDURES

SMC was originally retained by Coca-Cola to conduct an investigation which was generally to consist of: an evaluation of the geotechnical (structural) aspects of the site; and an environmental assessment of site and vicinity. The geotechnical investigation was to include drilling and sampling, i.e. physically examining representative soils underlying the site. The environmental assessment was intended to include a nonphysical evaluation, i.e. records research of the evironmental aspects of the site. This type of assessment has in recent years become a routine aspect of

the purchase of commercial property. The exception to this separation of tasks was that a member of our environmental staff was to review the results of the geotechnical drilling and sampling program as part of the environmental assessment. Environmental problems other than the one discussed in this report found to be associated with the site vicinity, for example, there are numerous EPA Superfund Sites located within a few miles of the site. These problems are not presented in this Interim Report, see letter from SMC to Coca-Cola dated October 26, 1988.

During drilling and sampling activities, SMC's field geologist noted a suspicious odor associated with soil samples collected near the northwest corner of the site. This information was reported to our environmental staff and following authorization from Coca-Cola, laboratory analyses of a selected soil sample was conducted. The laboratory chemical staff began their evaluation of the sample by physical examination. The results of the physical examination were that the soil was likely contaminated with a relatively heavy hydrocarbon chemical mixture. The laboratory chemists recommended to SMC that to begin the analyses, an Environmental Protection Agency (EPA) standard analysis Method 418.1 should be performed on the sample.

Results of the 418.1 analyses indicated that 850 mg/kg of Total Petroleum Hydrocarbons were contained in the soil

sample. Subsequently, the chemists recommended that an EPA method 8270 be conducted on the soil sample. Results of the 8270 analyses revealed that relatively low concentrations of semi-volatile hydrocarbons were contained in the sample. These results are included as Appendix A of this Interim Report.

Results of the laboratory analyses were reported verbally to Coca-Cola and additional drilling, soil sampling, and laboratory analyses were authorized. The purpose of this second phase of the investigation was to determine with a limited amount of drilling and sampling, if the hydrocarbons found are an isolated case or a more extensive problem. Results of the second phase of the investigation indicated the possibility that the hydrocarbon contamination could be relatively extensive. A decision was made by SMC and Coca-Cola to conduct laboratory analyses on selected soil samples and review the results prior to continuing with any additional drilling and soil sampling.

Results of drilling and sampling observations and correlation with laboratory results were that when physical observations such as color, texture, and odor indicated that the soil was contaminated, laboratory results verified these observations. Likewise, when physical observations indicated that soils were clean, laboratory analyses verified these observations. Based on this discovery, SMC was authorized by Coca-Cola to

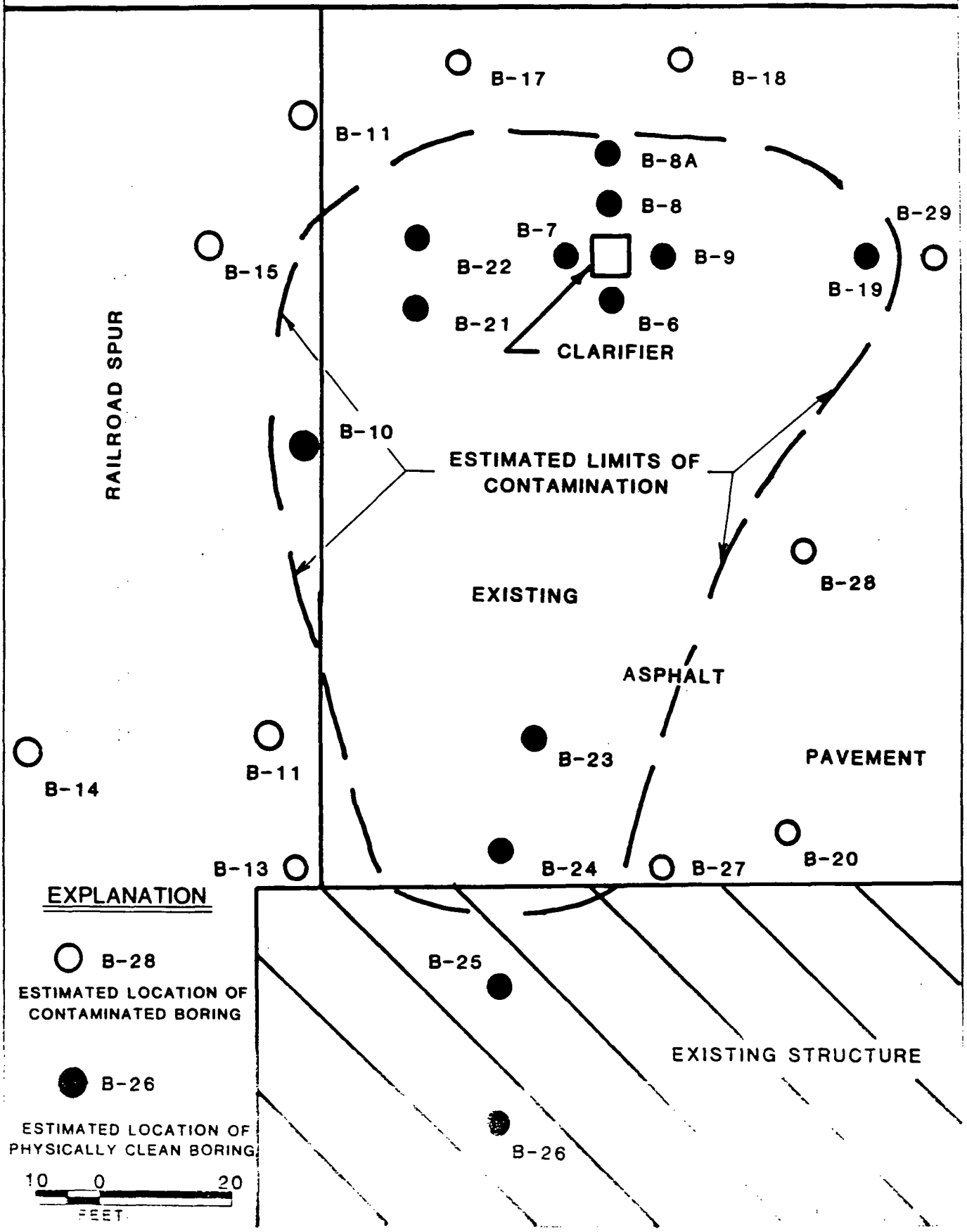
conduct additional drilling and sampling and by physical observation, determine the extent of the hydrocarbon contamination. Thus, a phase three drilling and sampling program was conducted. Soil samples were to be collected and preserved in case labortory analyses became necessary in the future. To date no laboratory analyses have been conducted on soil samples collected during the phase three drilling and sampling program. The samples are currently refrigerated at the SMC facility. SMC has recently been authorized by Coca-Cola to select five representative soil samples from the phase three drilling program for analyses to confirm the physical observations made. Laboratory analyses of these selected soil samples should be completed with ten days.

3.0 SUMMARY OF FINDINGS AND CONCLUSIONS

General findings of the phase 1, 2, and 3 investigation are as follows.

- The vertical and horizontal limits of the hydrocarbon contamination have been established based on physical observations. The horizontal limits of the contamination are shown relative to surrounding structures on Figure 1, a sketch of the site. The maximum depth that contamination was found was approximately 10 feet and the average depth is between 3 and 5 feet.

- Based on the horizontal and vertical limits of the contamination, the volume of contaminated soil appears to be between 750 and 1,000 cubic yards. This is only an estimate, conditions found during the future removal of this soil could change outside of the borings excavated, thus, this volume could vary.



LIMITS OF CONTAMINATION

10221-00 NOVEMBER, 1988

301 000052

4.0 RECOMMENDATIONS

- o Prior to the purchase of the subject site, Coca-Cola should be satisfied that the contaminated soil at the site has been thoroughly removed and properly documented or that a suitable arangement is made between the current owner and Coca-Cola that recognizes that clean up costs are likely to be incurred as a result of the finding of this contaminated soil. A general industry "rule of thumb cost" for the removal and legal disposal of hydrocarbon contaminated soil is between $250.00 and $300.00 per cubic yard.

- o The finding of hydrocarbon contaminated soil at this site should be reported to pertinent government regulatory agencies by the owner. And a remediation plan should be proposed and implemented.

5.0 LIMITATIONS OF INVESTIGATION

This Interim Report was prepared using a degree of care and skill ordinarily exercised, under similar circumstances, by reputable Soil Engineers, Geologists, and Environmental Scientists practicing in this or similar localities. No other warranty, expressed or implied is made as to the conclusions and professional advise included in this Plan. This Report was prepared for the use of Coca-Cola Enterprises and is intended for use as a means of final documentation of the contaminated soil discussed herein.

If you have any questions regarding this matter, please call.

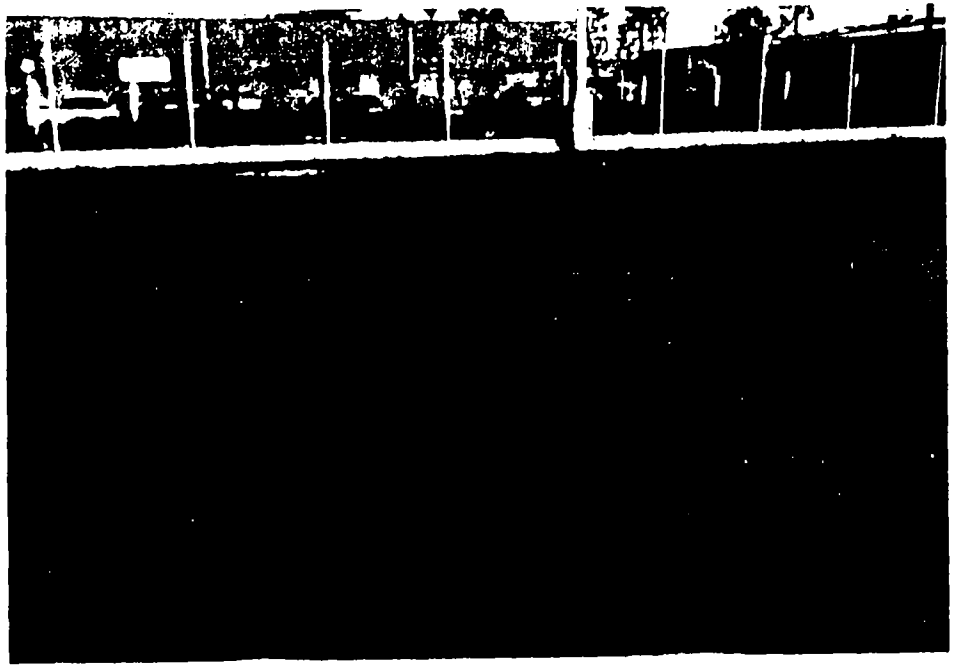
Very Truly Yours
Stoney-Miller Consultants, Inc.

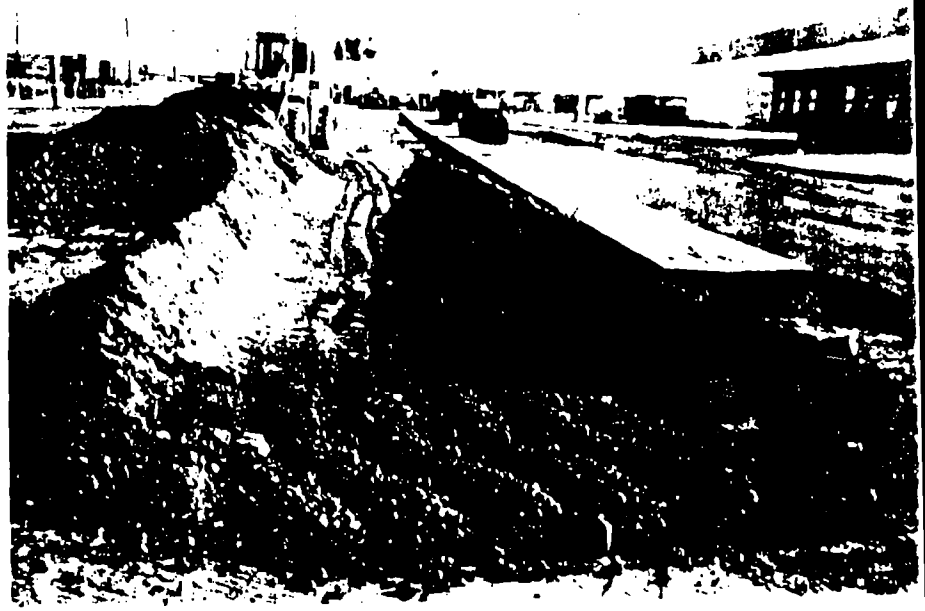
Gary T. Carlin
Consulting Environmental Geologist

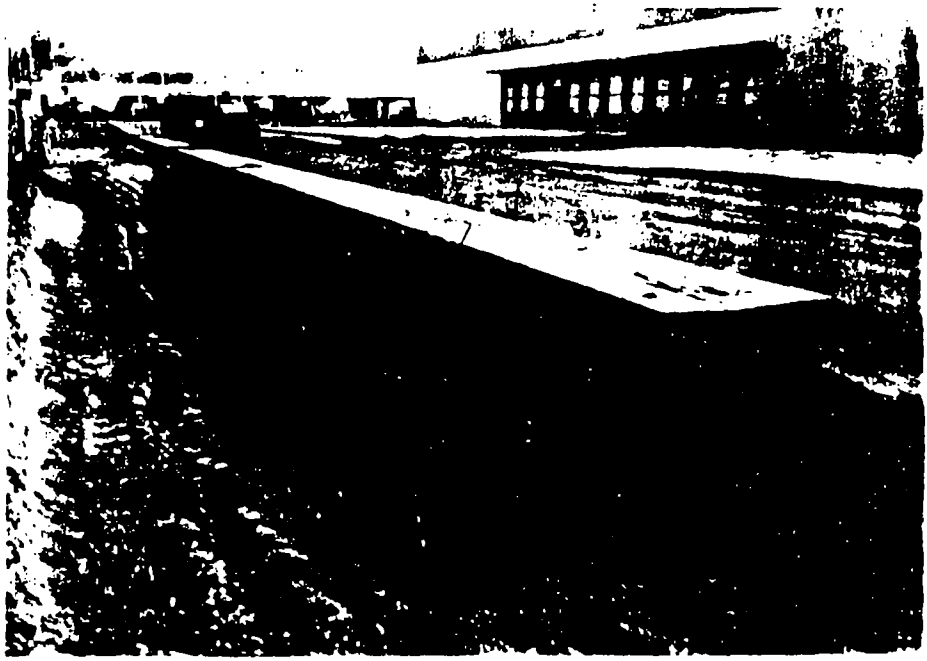
Attachments: Figure 1 - Site Sketch

ARCHIVAL PRESERVERS

DATE: 6-28-[illegible] ASSIGNMENT: [illegible] FILE NO [illegible]







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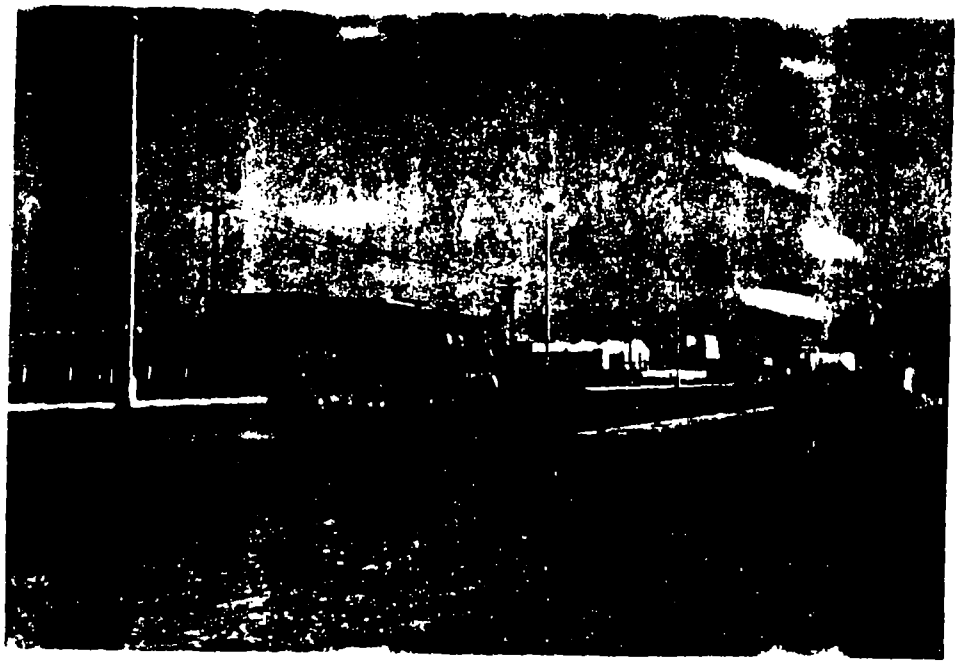

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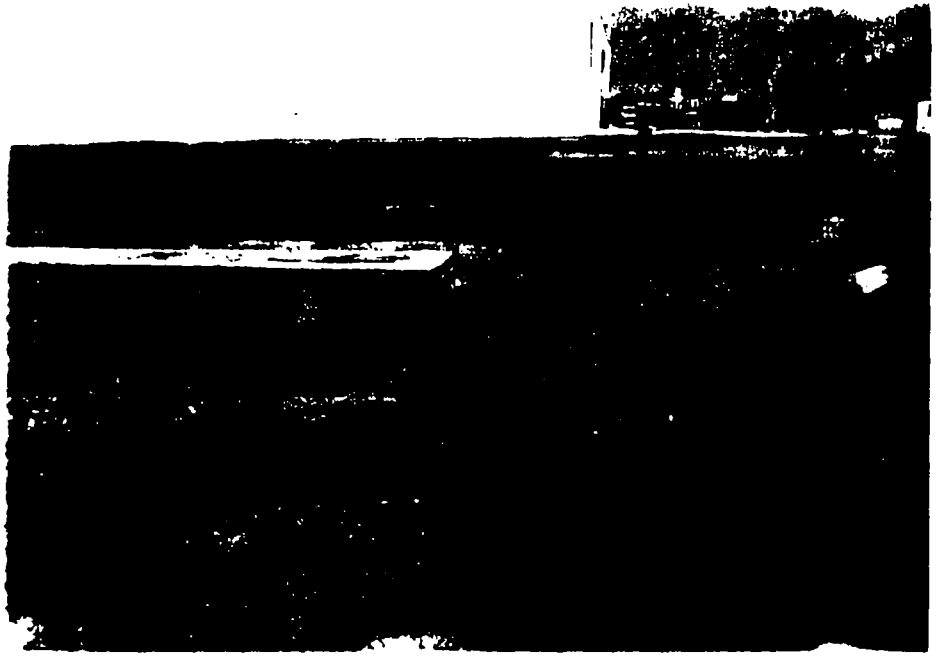
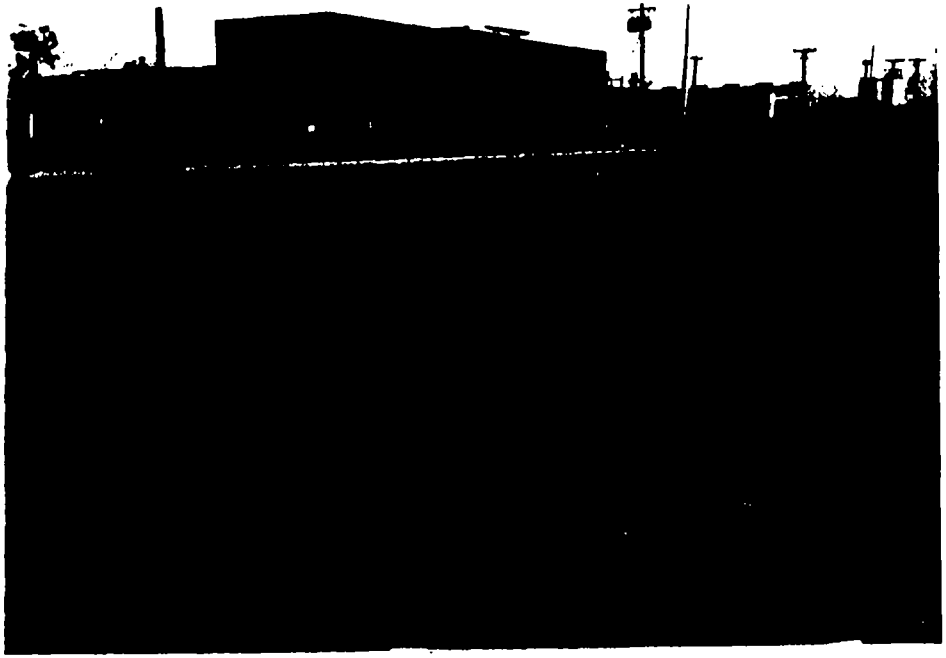
ARCHIVAL PRESERVERS

DATE: 6-28-90 ASSIGNMENT: TORRENCE, SOIL REMOVAL FILE NO: [illegible]





Project: 89007.02 TORRANCE CA/PHASE II
CONTAMINATION ASSESSMENT

Invoice No. 791105
Date 7-31-91
Page number 1

COCA COLA ENTERPRISES
ONE COCA COLA PLAZA
NW 752
ATLANTA GA 30313

ED TODD

ENVIRONMENTAL ENGINEERING SERVICES CLIENT PURCHASE ORDER #6021

DIRECT LABOR:

	Date	Hours	Rate	Amount	
CLERICAL SERVICES					
SANDRA COLLINGS CLERICAL	6-14-91	1.50	[illegible]	52.50	
Direct Labor Total:		1.50		52.50	52
			Current Charges:		52

Project Billing Summary

	Prior	Current	Total
DIRECT LABOR:	175.00	52.50	227.50
Total:	175.00	52.50	227.50

Approved By _____

TERMS: NET 30 DAYS

300 000484

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

White / Client Blue / Accounting Pink / File

Project: 89007-02 TORRANCE CA/PHASE II
CONTAMINATION ASSESSMENT

Invoice No. 391088
Date 3-29-91
Page number 1

COCA COLA ENTERPRISES
ONE COCA COLA PLAZA
NW 752
ATLANTA GA 30313

ED TODD

ENVIRONMENTAL ENGINEERING SERVICES CLIENT PURCHASE ORDER #5182

SERVICES RENDERED:

	Date	Hours	Rate	Amount	
PRINCIPAL/DISTRICT MANAGER					
STEVE MYERS					
REPORT PREPARATION	3-04-91	1.00	120.00	120.00	
SR. PROJECT MGR/SR. CONSULTANT					
ROWLAND HALL					
VENDOR CONTRACT PREP/REVIEW	3-01-91	.50	110.00	55.00	
Services Total:		1.50		175.00	175.00
			Current Charges:		175.00

Project Billing Summary

	Prior	Current	Total
SERVICES RENDERED:	.00	175.00	175.00
Total:	.00	175.00	175.00

Approved By _____

TERMS: NET 15 DAYS

300 000485

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

White / Client Blue / Accounting Pink / File

Project: 89007-00 TORRANCE CA

Invoice No. 191043
Date 1-31-91
Page number 1

COCA COLA ENTERPRISES
ONE COCA COLA PLAZA
NW 752
ATLANTA GA 30313

ED TODD

ENVIRONMENTAL ENGINEERING SERVICES CLIENT PURCHASE ORDER #5120

AUTHORIZED BY: RAUL RAMIREZ

SERVICES RENDERED:

	Date	Hours	Rate	Amount	
SENIOR PROJECT MANAGER					
ROWLAND HALL					
RECORDS REVIEW	1-07-91	.50	95.00	47.50	
Services Total:		.50		47.50	47.50
			Current Charges:		47.50

Project Billing Summary

	Prior	Current	Total
SERVICES RENDERED:	37,346.15	47.50	37,393.65
Reimbursable Expenses	4,177.08	.00	4,177.08
Total:	41,523.23	47.50	41,570.73

Approved By

TERMS: NET 15 DAYS

300 000486

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

White / Client Blue / Accounting Pink / File

Project: 89007-00 TORRANCE CA

Invoice No. 901131
Date 11-30-90
Page number 1

COCA COLA ENTERPRISES
ONE COCA COLA PLAZA
NW 752
ATLANTA GA 30313

ED TODD

ENVIRONMENTAL ENGINEERING SERVICES CLIENT PURCHASE ORDER #3563

AUTHORIZED BY: RAUL RAMIREZ

SERVICES RENDERED:

	Date	Hours	Rate	Amount	
PRINCIPAL/DIRECTOR-IN-CHARGE					
NYLE LAYTON					
REPORT PREPARATION	11-01-90	.50	110.00	55.00	
STEVE MYERS					
REPORT PREPARATION	11-01-90	2.00	110.00	220.00	
STAFF ENGINEER/GEOLOGIST					
RICHARD BYRD					
COORDINATION/SCHEDULING	11-05-90	1.00	55.00	55.00	
RECORDS REVIEW	11-05-90	.50	55.00	27.50	
CLERICAL SERVICES					
WENDY HINES					
CLERICAL	11-01-90	.50	35.00	17.50	
Services Total:		4.50		375.00	375.0

Reimbursable Expenses

	Date	Cost	Multiplier	Amount
FEDERAL EXPRESS/DELIVERY				
12003/536	11-02-90	41.50	1.200	49.80
FEDERAL EXPRESS/DELIVERY total				49.80
Reimbursable total:				49.80	49.8

TERMS: NET 15 DAYS

300 000487

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
P e 602-829-6311 Fax: 602-829-631

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Project: 89007-00 T(ANCE CA

nvoice No. 901131
Date 11-30-90
Page number 2

Current Charges: 424.

Project Billing Summary

	Prior	Current	Total
SERVICES RENDERED:	3,060.50	375.00	3,435.50
Reimbursable Expenses	4,127.28	49.80	4,177.08
Total:	7,187.78	424.80	7,612.58

Approved By

TERMS: NET 15 DAYS

300 000488

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

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Project: 89007-00 TORRANCE CA

Invoice No. 901006
Date 10-31-90
Page number 1

COCA COLA BOTTLING COMPANY
LOS ANGELES
1334 SOUTH CENTRAL AVE.
LOS ANGELES CA 90021

RAUL RAMIREZ

ENVIRONMENTAL ENGINEERING SERVICES

AUTHORIZED BY: RAUL RAMIREZ

SERVICES RENDERED:

	Date	Hours	Rate	Amount	
PRINCIPAL/DIRECTOR-IN-CHARGE					
STEVE MYERS					
REPORT PREPARATION	10-17-90	2.00	110.00	220.00	
	10-22-90	4.00	110.00	440.00	
Services Total:		6.00		660.00	660

Reimbursable Expenses

	Date	Cost	Multiplier	Amount
FEDERAL EXPRESS/DELIVERY				
12003-85778	7-07-90	62.80	1.200	75.36
12003/34153	10-12-90	15.50	1.200	18.60
FEDERAL EXPRESS/DELIVERY total				93.96
Reimbursable total:				93.96	93.
Current Charges:					753.

Project Billing Summary

	Prior	Current	Total
SERVICES RENDERED:	2,400.50	660.00	3,060.50
Reimbursable Expenses	4,033.32	93.96	4,127.28
Total:	6,433.82	753.96	7,187.78

Approved By S. Myers

TERMS: NET 15 DAYS

300 000489

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

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Project: 89007-00 TORRANCE CA

Invoice No. 900857
Date 8-30-90
Page number 1

COCA COLA BOTTLING COMPANY
LOS ANGELES
1334 SOUTH CENTRAL AVE.
LOS ANGELES CA 90021

RAUL RAMIREZ

ENVIRONMENTAL ENGINEERING SERVICES

AUTHORIZED BY: RAUL RAMIREZ

SERVICES RENDERED:

		Hours	Rate	Amount	
STAFF ENGINEER/GEOLOGIST					
RICHARD BYRD					
SAMPLE PREPARATION	7-24-90	.50	55.00	27.50	
Services Total		.50		27.50	27.5

Reimbursable Expenses

	Date	Cost	Multiplier	Amount
ANALYTICAL CHEMISTRY LAB SERV.				
	7-31-90	920.00	1.200	1,104.00
	8-02-90	1,925.00	1.200	2,310.00
ANALYTICAL CHEMISTRY LAB SERV. total				3,414.00
TRAVEL EXPENSES				
	8-22-90	31.94	1.200	38.33
TRAVEL EXPENSES total				38.33
PHOTOGRAPHS/MAPS				
	7-24-90	10.16	1.200	12.19
PHOTOGRAPHS/MAPS total				12.19
Reimbursable total:				3,464.52	3,464.5
Current Charges:					3,492.0

300 000490

TERMS: NET 15 DAYS

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

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Project: 89007-00 T RANCE CA

Invoice No. 900857
Date 8-30-90
Page number 2

Project Billing Summary

	Prior	Current	Total
SERVICES RENDERED:	2,373.00	27.50	2,400.50
Reimbursable Expenses	568.80	3,464.52	4,033.32
Total:	2,941.80	3,492.02	6,433.82

Approved By

USTEC

TERMS: NET 15 DAYS

300 000491

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone 602-829-6311 Fax: 602-829-6315

White / Client Blue / Accounting Pink / File

Project: 89007-00 TORRANCE CA

Invoice No. 900593
Date 7-31-90
Page number 1

COCA COLA BOTTLING COMPANY
LOS ANGELES
1334 SOUTH CENTRAL AVE.
LOS ANGELES CA 90021

RAUL RAMIREZ

ENVIRONMENTAL ENGINEERING SERVICES

AUTHORIZED BY: RAUL RAMIREZ

SERVICES RENDERED:

	Date	Hours	Rate	Amount
PRINCIPAL/DIRECTOR-IN-CHARGE				
NYLE LAYTON				
PROJECT MANAGEMENT	6-28-90	1.00	110.00	110.00
	7-02-90	.50	110.00	55.00
STEVE MYERS				
REPORT REVIEW	6-26-90	1.00	110.00	110.00
STAFF ENGINEER/GEOLOGIST				
RICHARD BYRD				
MISCELLANEOUS SAMPLING	6-28-90	.50	55.00	27.50
SITE RECONNAISSANCE	6-27-90	.50	55.00	27.50
MAKE READY/CLEAN UP	6-27-90	1.50	55.00	82.50
	6-28-90	.50	55.00	27.50
	6-29-90	.50	55.00	27.50
SAMPLE PREPARATION	6-28-90	.50	55.00	27.50
	6-29-90	.50	55.00	27.50
REPORT PREPARATION	7-02-90	.50	55.00	27.50
REPORT REVIEW	6-27-90	1.00	55.00	55.00
TRAVEL (AIR)	6-27-90	1.50	55.00	82.50
	6-29-90	2.00	55.00	110.00
EQUIPMENT CALIBRATION	6-27-90	.50	55.00	27.50
SITE REM. - SOIL EXCAV/REMOVAL	6-28-90	8.00	55.00	440.00
TRAVEL TIME (OTHER)	6-27-90	1.50	55.00	82.50

TERMS: NET 15 DAYS

300 000492

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

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Project: 89007-00 TORRANCE CA

Invoice No. 900593
Date 7-31-90
Page number 2

SERVICES RENDERED:

	Date	Hours	Rate	Amount	
CLERICAL SERVICES					
WENDY HINES					
CLERICAL	6-26-90	.30	35.00	10.50	
DRAFTSPERSON					
JO MOORE					
DRAFTING	6-27-90	1.00	35.00	35.00	
ACCOUNT MANAGEMENT					
BETH MILLER					
ADMINISTRATIVE SERVICES	6-26-90	1.50	45.00	67.50	
Services Total:		24.80		1,460.50	1,460.50

Reimbursable Expenses

	Date	Cost	Multiplier	Amount
OVM, PID				
	6-28-90	100.00	1.000	100.00
		OVM, PID total		100.00
MILEAGE, PER MILE				
	6-29-90	30.40	1.000	30.40
		MILEAGE, PER MILE total		30.40
TRAVEL EXPENSES				
	6-29-90	278.85	1.200	334.62
		TRAVEL EXPENSES total		334.62
JOB SUPPLIES				
	6-29-90	29.64	1.200	35.57
		JOB SUPPLIES total		35.57
Reimbursable total:				500.59	500.59
Current Charges:					1,961.09

Project Billing Summary

	Prior	Current	Total
SERVICES RENDERED:	912.50	1,460.50	2,373.00
Reimbursable Expenses	68.21	500.59	568.80
Total:	980.71	1,961.09	2,941.80

TERMS: NET 15 DAYS

300 000493

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

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Approved By

TERMS: NET 15 DAYS

300 000494

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

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Project: 89007-00 TORRANCE CA

Invoice No. 90045[illegible]
Date [illegible]
Page number [illegible]

[illegible] COL [illegible] COMPANY
LOS ANGELES
133[illegible] SOUTH CENTRAL AVE.
LOS ANGELES CA 90021

RAUL RAMIREZ

ENVIRONMENTAL ENGINEERING SERVICES

AUTHORIZED BY: RAUL RAMIREZ

SERVICES RENDERED:

	Date	Hours	Rate	Amount	
PRINCIPAL/DIRECTOR-IN-CHARGE					
NYLE LAYTON					
SITE RECONNAISSANCE	6-22-90	1.00	110.00	1[illegible]0.00	
SAMPLE PREPARATION	6-22-90	1.00	110.00	110.00	
TRAVEL (AIR)	6-22-9[illegible]	2.00	110.00	22[illegible].00	
TRAVEL TIME (OTHER)	[illegible]-22-9[illegible]	1.50	110.00	165.00	
STEVE MYERS					
COORDINATION/SCHEDULING	6-21-90	1.00	110.00	110.00	
	6-22-90	1.00	110.00	110.00	
CLERICAL SERVICES					
HENRY HINE					
CLERICAL	5-21-90	.50	35.00	17.50	
	5-[illegible]-90	.50	35.00	17.50	
	5-2[illegible]-90	.50	35.00	17.50	
[illegible] LOGUTKIEWICZ					
CLERICAL	5-11-90	.50	35.00	17.50	
	5-14-90	.50	35.00	17.50	
Services Total:		10.00		912.50	912.[illegible]

Reimbursable Expenses

	Date	Cost	Multiplier	Amount
FEDERAL EXPRESS/DELIVERY				
	6-[illegible]-90	40.84	1.200	[illegible]2.61

TERMS: NET 15 DAYS

300 000495

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
P[illegible] 602-829-6311 Fax: 602-829-631[illegible]

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[illegible] TORRANCE [illegible]

Invoice No [illegible]
Date [illegible]
Page number 2

Reimbursable Expenses

		Multiplier	Amount
[illegible]	10.00	1.200	15.[illegible]
FEDERAL EXPRESS DELIVERY total			[illegible]

Reimbursable total: 68.21 68.[illegible]

Current Charges: 980.[illegible]

Project Billing Summary

	Prior	Current	Total
SERVICES RENDERED:	.00	912.50	912.[illegible]
Reimbursable Expenses		68.21	[illegible].21
Total:	.00	980.71	980.71

Approved By [illegible]

USTEC

TERMS: NET 15 DAYS

300 000496

U.S. Technical Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150 Tempe, Arizona 85282
Phone: 602-829-6311 Fax: 602-829-6315

White / Client Blue / Accounting Pink / File

U.S. Technical Environmental Consulting, Inc.

Coca Cola Bottling Company
Los Angeles
1334 S. Central Ave.
Los Angles. CA 90021

Attn: Raul Ramirez

DATE: 04-29-90
INVOICE: 90-0160
PROJECT: TORRANCE CA
JOB NUMBER: 89007
P.O. NUMBER:
WORK PERFORMED: 3/17-4/06/90
Page 1 of 1

DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
PROGRESS REPORTS	0.4	110.00	44.00
SITE REM./SYSTEM INTSTALL	22.0	75.00	1,650.00
SAMPLE PREPARATION	5.0	75.00	375.00
TRAVEL TIME	4.0	75.00	300.00
REMEDIATION ENGINEERING	4.0	75.00	300.00
CLERICAL/ADMINISTRATION	3.9	35.00	136.50
FEDERAL EXPRESS	1.0	14.40	14.40
AIRFARE	1.0	477.00	477.00
JOB SUPPLIES	1.0	9.82	9.82
TRAVEL EXPENSES	1.0	78.00	78.00
INVOICE TOTAL:			$3.384.72

REVIEWED BY: STEVE MYERS SM

TERMS: NET 15 DAYS

300 000497

1414 W. Broadway Rd. • Ste. 150 • Tempe. AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

USTEC
U.S. Technical Environmental
Consulting, Inc.

Coca Cola Bottling Company
Los Angeles
1334 South Central Ave.
Los Angeles CA 90021

Attn: Raul Ramirez

DATE: 3/30/90
INVOICE: 90-0120
PROJECT: TORRANCE CA
JOB NUMBER: 89007
P.O. NUMBER:
WORK PERFORMED: 2/19-3/12/90
Page 1 of 1

DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
PROGRESS REPORTS	0.6	110.00	66.00
CONSULTATION	1.0	410.40	410.40
CLERICAL/ADMINISTRATIVE	4.0	35.00	140.00
FEDERAL EXPRESS	1.0	24.30	24.30
ANALYTICAL CHEMISTRY LAB	1.0	6487.20	6,487.20
TRAVEL EXPENSE	1.0	93.87	93.87
JOB SUPPLIES	1.0	2.28	2.28
TOTAL INVOICE:			$7,224.05

REVIEWED BY: STEVE MYERS sm

TERMS: NET 15 DAYS

300 000498

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U.S. Technical Environmental Consulting, Inc.

Coca Cola Bottling Co.
Los Angeles
1334 South Central Ave
Los Angeles, CA 90021

Attn: Raul Ramirez

DATE: 2/27/90
INVOICE: 90-0048
PROJECT: TORRANCE CA
JOB NUMBER: 89007
P.O. NUMBER: R RAMIREZ
WORK PERFORMED: 1/8-2/9/90

DESCRIPTION	QUANTITY	UNIT PRICE	AMOUNT
REPORT PREPARATION	1.5	110.00	165.00
PROGRESS REPORTS	0.3	110.00	33.00
MAKE READY/CLEAN UP	4.0	75.00	300.00
REMEDIATION DESIGN/ENG.	5.0	75.00	375.00
TRAVEL TIME	2.0	75.00	150.00
CLERICAL/ADMINISTRATIVE	4.9	35.00	171.50
FEDERAL EXPRESS	1.0	27.90	27.90
ANALYTICAL CHEMISTRY LAB	1.0	540.00	540.00
AIRFARE	1.0	299.20	299.20
TRAVEL EXPENSES	1.0	157.60	157.60
SUPPLIES	1.0	9.95	9.95

INVOICE TOTAL: $2,229.15

REVIEWED BY: PETER BEAVER
Sm

TERMS: NET 15 DAYS

300 000499

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

U.S. Technical Environmental Consulting, Inc.

Coca Cola Bottling Company
Los Angeles
1334 South Central Ave
Los Angeles, CA 90021

Attn: Raul Ramirez

INVOICE 90-0007 1-10-90
PROJECT TORRANCE CA
JOB NUMBER 89007
Work Performed from 11/27-12/29/89

7.0	Report Review, per hour	$110.00	$ 770.00
.16	Progress Reports	110.00	17.60
7.0	Report Review, per hour	95.00	665.00
6.0	Remediation Design/Engineering	95.00	570.00
1.6	Progress Reports	95.00	152.00
32.0	Report Preparation	95.00	3040.00
6.0	Report Preparation	75.00	450.00
9.0	Report Review	75.00	675.00
2.0	Remediation Design/Engineering	75.00	150.00
11.0	Drafting	35.00	385.00
15.7	Clerical/Administration	35.00	549.50
1.0	Permitting and Topographics	2546.47	2546.47
1.0	Airfare	300.00	300.00
	INVOICE TOTAL:		$ 10,270.57

TERMS: NET 15 DAYS

300 000500

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USTEC
U.S. Technical Environmental
Consulting, Inc.

Coca Cola Bottling Company
Los Angeles
1334 S. Central Ave.
Los Angeles, CA 90021

INVOICE 89-054 12-2-89
PROJECT TORRANCE CALIFORNIA
JOB NUMBER 89007
Work Performed from 11/04-11/22/89

Attn: Raul Ramirez

.4	Progress Reports, per hour	$110.00	$ 44.00
2.0	Report Review	110.00	220.00
.3	Report Review	95.00	28.50
.2	Progress Reports	95.00	19.00
20.0	Remediation Design/Engineering	95.00	1900.00
30.0	Report Preparation	75.00	2250.00
7.9	Clerical/Administration	35.00	276.50
1.0	Analytical Chemistry Lab Services	1230.00	1230.00

INVOICE TOTAL: $5,958.00

TERMS: NET DUE UPON RECEIPT

300 000501

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

US Tech. .al Environmental Consu..g, Inc.

Coca-Cola Bottling Company
Los Angeles
1334 S. Central Ave
Los Angeles, CA 90021

Attn: Raul Ramirez

INVOICE 89-002 11-06-89
PROJECT TORRANCE CALIFORNIA
JOB NUMBER 89007
Work Performed from 10/23-11/03/89

27.0	Excavating & Sampling, per hour	$75.00	$2025.00
1.5	Consultation, per hour	95.00	142.50
54.0	Mileage, per mile	.40	21.60
1.0	Airfare	288.00	288.00
1.0	Travel Expenses	393.39	393.39
1.0	Job Supplies	30.67	30.67
	INVOICE TOTAL:		$2,901.16

1414 WEST BROADWAY ROAD SUITE 150 TEMPE ARIZONA 85282 (602) 829-6311

0037-0259)

US Technical Environmental Consulting, Inc.

Coca-Cola Bottling Company
Los Angeles
1334 S. Central Ave
Los Angeles, CA 90021

INVOICE 89-002 11-06-89
PROJECT TORRANCE CALIFORNIA
JOB NUMBER 89007
Work Performed from 10/23-11/03/89

Attn: Raul Ramirez

27.0	Excavating & Sampling, per hour	$75.00	$2025.00
1.5	Consultation, per hour	95.00	142.50
54.0	Mileage, per mile	.40	21.60
1.0	Airfare	288.00	288.00
1.0	Travel Expenses	393.39	393.39
1.0	Job Supplies	30.67	30.67
	INVOICE TOTAL:		$2,901.16

1414 WEST BROADWAY ROAD SUITE 150 TEMPE ARIZONA 85282 (602) 829-6311

0039-02591

WESTERN TECHNOLOGIES INC.

• 3737 East Broadway Road / P.O. Box 21387 / Phoenix, Arizona 85036 / (602) 437-3737
• Gateway Plaza / [illegible] West Second Avenue, No. 10 / Mesa, Arizona 85202 / (602) 834-3984
• 17200 North Dys[illegible] [illegible]3, No. 13 / P.O. Box 2431 / Sun City, Arizona 85372 / (602) 975-21[illegible]
• 2400 East Hunting[illegible] Drive / Flagstaff, Arizona 86001 / (602) 774-8709
• Route 1, Box 1030 / Lakeside, Arizona 85929 / (602) 368-5568
• 3480 South Dodge Boulevard / Tucson, Arizona 85713 / (602) 746-2262
• 1827 South Paseo San Luis / Sierra Vista, Arizona 85635 / (602) 458-0364
• 1610 Riverview Drive, No. 5 / Bullhead City, Arizona 86442 / (602) 758-8378

PURCHASE ORDER

All Documents Must Refer to Purchase Order Number

Vendor: Del Mar Analytical
18102 Sky Park South Suite E
Irvine, CA 92714

Dept. No. 217 Date 9-12-89

Freight: ☐ FOB Destination ☐ FOB Shipping Point ☐ Prepaid ☐ Collect

Via

Price Quote: ☑ Yes ☐ No Price Quoted By: Gary Steube

Ship To Attn: Date Req'd

Item	Description	Quantity	Unit Price	Amount	Account No.	Dept.	Job	Function	Asset No.
	TPHC 418.1		75.00						

VOUCHER INPUT

Voucher No.

Vendor No.

W.T. Pay Date

Invoice No.

Invoice Date

Invoice Amount

Use Tax

Freight Charges on Out of State $

Discount −$

INVOICE TOTAL

Requested By Virgil Townsend

Dept./Div.Mgr.

TOTAL

White-Div.File; Yellow-Vendor; Pink-Dept.File

300 000504

WESTERN TECHNOLOGIES INC.

• 3737 East Broadway Road / P.O. Box 21387 / Phoenix, Arizona 85036 / (602) 437-3737
• Gateway Plaza / 663 West Second Avenue, No. 10 / Mesa, Arizona 85202 / (602) 834-3984
• 17200 North Dysart, No. 13 / P.O. Box 2431 / Sun City, Arizona 85372 / (602) 975-2154
• 2400 East Huntington Drive / Flagstaff, Arizona 86001 / (602) 774-8708
• Route 1, Box 1030 / Lakeside, Arizona 85929 / (602) 368-5568
• 3480 South Dodge Boulevard / Tucson, Arizona 85713 / (602) 746-2262
• 1827 South Paseo San Luis / Sierra Vista, Arizona 85635 / (602) 458-0364
• 1610 Riverview Drive, No. 5 / Bullhead City, Arizona 86442 / (602) 758-8378

PURCHASE ORDER

All Documents Must Refer to Purchase Order Number

Vendor: Dulin-Baynton
729 E. Willow
Signal Hill, CA 90806

Dept. No. 217 Date 9-12-89

Freight: ☐ FOB Destination ☐ FOB Shipping Point ☐ Prepaid ☐ Collect

Via

Price Quote: ☐ Yes ☐ No Price Quoted By:

Ship To Attn: Date Req'd

Item	Description	Quantity	Unit Price	Amount	Account No.	Dept.	Job	Function	Asset No.
	Surveyor								

VOUCHER INPUT

Voucher No.
Vendor No.
W.T. Pay Date
Invoice No.
Invoice Date
Invoice Amount
Use Tax
Freight Charges on Out of State $
Discount −$

INVOICE TOTAL

Requested By: Virgil Turner

Dept./Div. Mgr.

TOTAL

White-Div File; Yellow-Vendor; Pink-Dept. File

300 000505

WESTERN TECHNOLOGIES INC.

- 3737 East Broadv ad / P.O. Box 21387 / Phoenix, Arizona 85036 / (602) 437-3737
- Gateway Plaza / est Second Avenue, No. 10 / Mesa, Arizona 85202 / (602) 834-3964
- 17200 North Dysart Road, No. 13 / P.O. Box 2431 / Sun City, Arizona 85372 / (602) 975-215
- 2400 East Huntington Drive / Flagstaff, Arizona 86001 / (602) 774-8708
- Route 1, Box 1030 / Lakeside, Arizona 85929 / (602) 368-5568
- 3480 South Dodge Boulevard / Tucson, Arizona 85713 / (602) 748-2262
- 1827 South Paseo San Luis / Sierra, Vista, Arizona 85635 / (602) 458-0364
- 1610 Riverview Drive, No. 5 / Bullhead City, Arizona 86442 / (602) 758-8378

PURCHASE ORDER

[illegible]

All Documents Must Refer to Purchase Order Number

endor [illegible] Dept. No. [illegible] Date [illegible]

Freight: ☐ FOB Destination ☐ FOB Shipping Point ☐ Prepaid ☐ Collect

ice Quote: ☑ Yes ☐ No Price Quoted By: [illegible]

Via

ip To Attn: Date Req'd

em	Description	Quantity	Unit Price	Amount	Account No.	Dept.	Job	Function	Asset No.
	[illegible]		[illegible]						
	[illegible]								
	[illegible]			[illegible]			[illegible]		

VOUCHER INPUT

Voucher No.

Vendor No.

W.T. Pay Date

Invoice No.

Invoice Date

Invoice Amount

Use Tax

Freight Charges on Out of State $

Discount —$

INVOICE TOTAL

Requested By [illegible]

Dept./Div Mgr. [illegible]

TOTAL

300 000506

WESTERN TECHNOLOGIES INC.

- 3737 East Broadway Road / P.O. Box 21387 / Phoenix, Arizona 85036 / (602) 437-3737
- Gateway Plaza / 6[illegible] West Second Avenue, No. 10 / Mesa, Arizona 85202 / (602) 834-3964
- 17200 North Dys[illegible]d, No. 13 / P.O. Box 2431 / Sun City, Arizona 85372 / (602) 975-21[illegible]
- 2400 East Huntin[illegible] Drive / Flagstaff, Arizona 86001 / (602) 774-8708
- Route 1, Box 1030 / Lakeside, Arizona 85929 / (602) 368-5568
- 3480 South Dodge Boulevard / Tucson, Arizona 85713 / (602) 748-2262
- 1827 South Paseo San Luis / Sierra, Vista, Arizona 85635 / (602) 458-0364
- 1610 Riverview Drive, No. 5 / Bullhead City, Arizona 86442 / (602) 758-8378

PURCHASE ORDER

All Documents Must Refer to Purchase Order Number

Vendor Dulin-Boynton
[illegible]

Dept. No. [illegible] Date [illegible]

Freight: ☐ FOB Destination ☐ FOB Shipping Point ☐ Prepaid ☐ Collect

Price Quote: ☐ Yes ☐ No ☒ Price Quoted By: [illegible]

Via [illegible]

Ship To [illegible] Attn: [illegible] Date Req'd [illegible]

Item	Description	Quantity	Unit Price	Amount	Account No.	Dept.	Job	Function	Asset No
	[illegible]								
	[illegible]		[illegible]						
	[illegible]		[illegible]						
	[illegible]		[illegible]						
	[illegible]			[illegible]			[illegible]	[illegible]	

VOUCHER INPUT

Voucher No

Vendor No.

W.T. Pay Date

Invoice No

Invoice Date

Invoice Amount

Use Tax

Freight Charges on Out of State $

Discount −$

INVOICE TOTAL

Requested By [illegible]

Dept./Div.Mgr. [illegible]

White-Div.File, Yellow-Vendor, Pink-Dept.File

TOTAL [illegible]

300 000507

0639-0259/

Foor		36.00
Labor	=	28.00
Compactor	=	30.00
P/U truck		8.00
Hoe		25.00
Skip		60.00
Meter	daily	40.00
Water Truck		60.00

REVIEWED	WESTERN TECHNOLOGIES INC.
PREPARED	The Quality People

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 10/18/89
wed.

BILL TO Coca Cola Enterprises JOB ADDRESS 19875 Pacific Gateway Dr.

CUSTOMER PURCHASE ORDER NO. | CUSTOMER JOB NO. | SALESMAN | OPERATOR NO. | OVERTIME WORK | TRAVEL TIME | WATER TANK USED | GENERATOR USED

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	UNIT COST	AMOUNT
	Foreman	6 hrs		
	Excavator	6 hrs		
	Bottom Dump	6 hrs		
	Water Truck	6 hrs		
	Skiploader	6 hrs.		

WE ASSUME NO REPSONSIBILTY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 18% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill. Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000509

Stu
LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 10/17/89

BILL TO: Coca-Cola Enterprises

JOB ADDRESS:

CUSTOMER PURCHASE ORDER NO. | CUSTOMER JOB NO. | SALESMAN | OPERATOR NO. | OVERTIME WORK | TRAVEL TIME | WATER TANK USED | GENERATOR USED

outside ~~[illegible]~~ Building area

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	~~UNIT COST~~	AMOUNT
	Foreman	8		
	Excavator	8		
	Bottom Dump	8		
	Water Truck	8		
	Skiploader	8		

Virgil Townsend

WE ASSUME NO REPSONSIBILITY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill. Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000510

Stu
LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 8/25/89
10

BILL TO Coca-Cola Enterprises JOB ADDRESS Pacific Gateway Drive

CUSTOMER PURCHASE ORDER NO. (U.S. Tech) CUSTOMER JOB NO. 89007 SALESMAN OPERATOR NO. OVERTIME WORK TRAVEL TIME WATER TANK USED GENERATOR USED

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	UNIT COST	AMOUNT
	Foreman	4 hrs		
	Excavator	6 hrs.		
	Skiploader	6 hrs.		
	Watertruck	6 hrs		
	Pickup truck.	4 hrs		
	Lowside	4 hrs.		
	Bottom Dump	4.5 hrs.		
	Laborer	2 hrs.		

Virgil [signature]

WE ASSUME NO REPSONSIBILTY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill. Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000511

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/12/89

BILL TO Coca-Cola West-Ent
1200 S Central Ave
L.A.

JOB ADDRESS 19875 Pacific Gateway Dr
Torrence

CUSTOMER PURCHASE ORDER NO. | CUSTOMER JOB NO. | SALESMAN | OPERATOR NO. | OVERTIME WORK | TRAVEL TIME | WATER TANK USED | GENERATOR USED

PO # 027938
western tech # 2179 v. 268

IN | OUT | Total

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	UNIT COST	AMOUNT
	Fore	4 : 4 hrs		
	Labor	8 : 8 hrs		
	Ford 855	8 : 8 hrs		
	Pickup	8 : 8 hrs		
	Virgil Townsend 7-13-89			

WE ASSUME NO REPSONSIBILTY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill. Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000512

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/14/89

BILL TO: COCO-COLA
1200 S CENTRAL AVE
L.A.

JOB ADDRESS: 19875 PACIFIC GATE WAY DR
TORANCE

CUSTOMER PURCHASE ORDER NO.: P.O# 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

WESTERN TECH # 2179J.268

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	IN.	OUT	Total	UNIT COST	AMOUNT
	FORE			8 hrs	8 hrs		
	LABORER			8 hrs	8 hrs		
	FORD #655 BACKHOE			8 hrs	8 hrs		
	PICK UP			8 hrs	8 hrs		
GAS TECH	MODEL #1314 METER			Day	Day		
	Vigil Travel						

WE ASSUME NO REPSONSIBILITY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill, Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000513

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/21/89

BILL TO: Coca-Cola
1200 Central Ave
LA

JOB ADDRESS: 19875 Pacific Gateway
Torrance

CUSTOMER PURCHASE ORDER NO.: P.O # 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

Western Tech # 2179J. 286

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	IN	OUT	Total	UNIT COST	AMOUNT
		Ford #655 Backhoe	4	4	8		
		Water Truck		8	8		
		Foreman		8	8		
		Laborer		8	8		
		Gas Tech Meter Model #121K		day	day		
		Welders Helper		8	8		
		Bottom Dump	7		7		
		Virgil Torres					

WE ASSUME NO REPONSIBILITY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF. :
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 18% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill, Customer agrees to pay all costs of collection, including reasonable attorney's fees.

300 000514

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/20/89

BILL TO: Coca-Cola
1200 Central Ave
L.A.

JOB ADDRESS: 19875 Pacific Gateway
Torance

CUSTOMER PURCHASE ORDER NO.: PO # 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR U

WESTERN TECH # 2179T-268

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	IN	OUT	Total	UNIT COST	AMOUNT
	FORT # 655 BACKHOE			8	8		
	WATER TRUCK			8	8		
	FOREMAN			8	8		
	LABORER			8	8		
	~~LABORER~~						
	GAS TECH meter Model # 1314			day	day		
	WELDERS HELPER			8	8		
	Virgil Townsend						

WE ASSUME NO REPONSIBILITY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill, Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000515

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4530
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9 / 15 / 89

BILL TO: COCO-Cola
1200 CENTRAL AVE
LA

JOB ADDRESS: 19875 Pacific Gateway AV
TORANCE

CUSTOMER PURCHASE ORDER NO.: P.O. # 027938

CUSTOMER JOB NO.:

SALESMAN:

OPERATOR NO.:

OVERTIME WORK:

TRAVEL TIME:

WATER TANK USED:

GENERATOR USED:

WESTERN Tech # 2179T-268

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED			UNIT COST	AMOUNT
		IN	OUT	TOTAL		
	FOREMAN		8	8		
	LABORER		8	8		
	FORD # 655 Back Hoe		8	8		
Gas Tech	Model # 1314 METER		Day	Day		
	Pick Up		8	8		

Virgil Torres

WE ASSUME NO REPSONSIBILITY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of [illegible] per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing on this bill, Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000516

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4330
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/16/89

BILL TO: Coco-Cola
1200 Central Ave
LA

JOB ADDRESS: 19873 Pacific Gateway Ave
Torrance

CUSTOMER PURCHASE ORDER NO.: P.O # 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

Western Tech # 2179J-268

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED			UNIT COST	AMOUNT
		IN	OUT	Total		
	Ford # 655 Backhoe		8 hrs	8 hrs		
	Skid Loader Move in and out 2 hrs		8 hrs	10 hrs		
	Water Tr Move in and out 2 hrs		8 hrs	10 hrs		
	Compactor Move in and out 2 hrs		8 hrs	10 hrs		
	Foreman		8 hrs	8 hrs		
	Laborer		8 hrs	8 hrs		
	Pick up.		8 hrs	8 hrs		
	Gastech meter Model # 1314		day	day		
	Virgil Townsend					

WE ASSUME NO REPSONSIBILTY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice: If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 18% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill, Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000517

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/18/89

BILL TO: COCO-COLA
1200 CENTRAL AVE
LA

JOB ADDRESS: 19875 PACIFIC GATEWAY AVE
TORANCE

CUSTOMER PURCHASE ORDER NO.: P.O# 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

WESTERN TECH # 2179 I 286

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED			UNIT COST	AMOUNT
		IN	OUT	Total		
	Ford # 655 BackHoe		8	8		
	Skip Loader		8	8		
	Water Truck		8	8		
	Compactor		8	8		
	Foreman		8	8		
	Laborer		8	8		
	Laborer		8	8		
	Pick up		8	8		
	Gas Tech Meter Model # 131H		Dan	Dan		
	Virgil Townsend					

WE ASSUME NO REPSONSIBILTY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill, Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000518

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/19/89

BILL TO: Coco-Cola
1200 Central Ave
LA

JOB ADDRESS: 19875 Pacific Gateway Ave
Torance

CUSTOMER PURCHASE ORDER NO.: P.O# 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

Western Tech #2179J-268

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED			UNIT COST	AMOUNT
		IN	OUT	Total		
	Ford #655 Back Hoe		8	8		
	Skip loader		8	8		
	Water Truck		3	3		
	Compactor		8	8		
	Foreman		8	8		
	Laborer		8	8		
	Laborer		4	4		
	Pick up		8	8		
	Gas Tech Meter model #1314		day	day		
	Virgil Townsend					

WE ASSUME NO REPSONSIBILITY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill, Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000519

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/22/89

BILL TO: Coco-Cola
1200 Central Ave
LA

JOB ADDRESS: 19875 Pacific Gateway
Torance

CUSTOMER PURCHASE ORDER NO.: P.O # 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

Western Tech # 2179J-286

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	IN	OUT	TOTAL	UNIT COST	AMOUNT
	~~Ford # 635 Backhoe~~						
	Water Truck			8	8		
	225 Backhoe			2	2	[illegible]	
	Foreman			8	8		
	Laborer			8	8		
	Laborer			8	8		
	Gasteck meter Model # 1314			[illegible]	[illegible]		

Virgil Tourned

WE ASSUME NO REPSONSIBILTY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill. Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000520

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 9/25/89

BILL TO: COCA. Cola
1200 CENTRAL AVE
LA

JOB ADDRESS: 19875 PACIFIC GATE WAY
TORRANCE

CUSTOMER PURCHASE ORDER NO.: PO# 027938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

WESTERN TECH # 3179 J-286

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	IN	OUT	Total	UNIT COST	AMOUNT
		225 BACKHOE		8	8		
		SKIP LOADER		8	8		
		WATER TRUCK		8	8		
		Bottom dump		8	8		
		FOREMAN		8	8		
		LABORER		6	6		
		Virgil Townsend					

WE ASSUME NO REPSONSIBILITY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 18% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill. Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000521

Stu LEDSAM EQUIPMENT CO.

P.O. BOX 4830
Long Beach, CA 90804
General Engineer License A-527194
Hazardous Substances Removal Certification

Phone: 438-1948
434-4152

DATE: 7/26/89

BILL TO: Coca-Cola
12 Central Ave
LB

JOB ADDRESS: 19875 Gateway
Torrance

CUSTOMER PURCHASE ORDER NO.: P.O.# 029938
CUSTOMER JOB NO.:
SALESMAN:
OPERATOR NO.:
OVERTIME WORK:
TRAVEL TIME:
WATER TANK USED:
GENERATOR USED:

Western Tech # 2179J.286

CODE NO.	AMOUNT	TYPE OF WORK PERFORMED	IN	OUT	Total	UNIT COST	AMOUNT
		255 Backhoe		8	8		
		Skiploader		8	8		
		Water Truck		8	8		
		Bottom Dump		7	7		
		Foreman		8	8		
		Laborer		8	8		
		Signed Forward					

WE ASSUME NO REPSONSIBILTY FOR LAYOUT AND/OR DAMAGES AS THE RESULT OF.
TERMS: NET 30 days Payment is due upon presentation of invoice. If any invoice is not paid in full within 30 days after its billing date, the Customer hereby agrees to pay interest at the rate of 10% per annum upon the unpaid portion of the invoice. If action or suit is brought by Stu LEDSAM to collect any amount due or owing under this bill, Customer agrees to pay all costs of collection including reasonable attorney's fees.

300 000522

ROJECT COST SUMMAI

PROJECT NAME Coke - Torrence TODAY'S DATE 10-4-89

PROJECT NO. 2179J286 PH. 01 TSK. _____ PREPARED BY V. Townsend

ACTIVITY	ITEM	UNIT	QUAN	RATE	SUBTOTAL	MARKUP	TOTAL
LABOR	Proj. Mng	hr.					
		hr					
		hr.					
					24,929		24,929
					15,000 IN		
EQUIP.					10,000 out		
MATERIAL							
ANALYTICAL	Terra Tech	TL	1	-	13,060		13,060
							2400
	ATI	TL	6	400	2400		
TRANSPORTATION				9275 IN			
				6185 out			
OUTSIDE EQUIP.	STU Ledson						
	IN						
	out						
					29,000		29,000
DISPOSAL							
					9275 IN		
			8310's		+2100		
EMARKS:		TODAY'S TOTAL			6185 out		69,389
		PREVIOUS TOTAL			+ 700		
		TOTAL TO DATE					

300 000523

USTEC

U.S. Technical Environmental
Consulting, Inc.

June 14, 1991

Mr. David R. Hargis
Hargis and Associates, Inc.
2223 Avenida De La Playa, Suite 300
La Jolla, California 92037

RE: CHANGE IN PROJECT MANAGEMENT, COCA-COLA ENTERPRISES, INC. FACILITY, CARSON, CALIFORNIA. USTEC JOB NO. 89007

Dear Mr. Hargis:

This letter is to inform you of a change in project management for the Coca-Cola Enterprises Inc. facility located in Carson, California. Mr. Pete Beaver is no longer with U.S. Technical Environmental Consulting, Inc. Please direct all future correspondence to Mr. Rowland L. Hall.

If you should have any questions regarding this matter, please do not hesitate to call Mr. Rowland Hall or myself at (602) 829-6311.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Steven M. Myers, R.G.
President

\skc

300 000524

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315
Tempe, Arizona • Tampa, Florida

May 14, 1990

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: 19875 PACIFIC GATEWAY DRIVE. REMOVAL OF CONTAMINATED SOIL. JOB NO. 89007.

Dear Mr. Ramirez:

Enclosed please find the copies of the Non-Hazardous Waste Data Forms used in the transportation of soil from the Carson project located at 19875 Pacific Gateway Drive, Carson, California. Also, please find enclosed copies of the weight tickets and tickets representing the rental of the loader. In summary, a total of 1628.38 tons was transported to Brent Petroleum Corporation located at 1008 South Cervera Avenue, Wilmington, California.

On Wednesday, March 28, 1990, the work was initiated. The soil was loaded onto end-dump type trucks using a 980C loader. The loader had a bucket capacity of 4 yards and could load a truck in approximately three minutes. After each truck was loaded the load was covered with a tarp. The truck then proceeded to the recycling facility mentioned above. The empty trucks returned to the site for additional loads. In total, six trucks were used to transport the material.

On Thursday, March 29, 1990, the remaining soil was transported to the recycling facility. Brent Petroleum is invoicing you directly for the disposal of the materials and has also provided you with a certificate of reuse for the material. Copies are attached. Please contact us if you have any questions or comments.

Sincerely

U.S. TECHNICAL ENVIRONMENTAL CONSULTING

Peter A. Beaver
Manager Remediation Services

Steven M. Myers, R.G.
President

Copy to: Ed Todd, CCE - Atlanta

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

October 9, 1989

Ms. Terry Ahn
R. R. Donnelly & Sons
19681 Pacific Gateway Drive
Torrance, California 90502

Dear Ms. Ahn:

RE: 19875 PACIFIC GATEWAY DRIVE, COCA-COLA SITE. JOB NO. 2179J286.

In reference to our conversation of September 29, 1989 concerning the subject site which is adjacent to your facility on the South, I have enclosed a copy of a letter from the California Department of Health Services (DOHS). In this letter, DOHS outlines the boundaries of an area of concern which also includes your site.

DOHS states that naphthalene and phenanthrene were associated with former uses conducted on the site. These are members of a class of compounds called polynuclear aromatic hydrocarbons which are relatively immobile yet of concern in part because they are environmentally persistent.

Other compounds that might be of interest to you are the class of compounds that are detected in analyses performed for total petroleum hydrocarbons and volatile organic compounds. These compounds are usually associated with industrial operations that involve petrochemical processing.

WTI has performed a characterization of the 19875 Pacific Gateway Drive site, and has reached conclusions as to the extent and nature of the compounds present that could impact the utilization of the site.

Because we have extensive experience in the immediate vicinity of your site, we would be able to advise you on how best to perform an environmental audit of your facility at such time as a transfer in ownership would appear likely.

Coca-Cola/Torrance
Job No. 2179J286

We hope this is sufficient for your needs at this time, please contact us if you have any questions or comments.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

for Clifford R Pollock, R.C.E., C.E.G.
Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/sdm

Enclosures:

OPTIONS FOR COCA-COLA TORRANCE

1. LEAVE IN PLACE

To accomplish this option physically, the potential of contact with the contaminated soil would need to be limited. Since virtually the whole site is to be covered by newly constructed or installed material, this could be accomplished with reasonable care. Any areas of the site that would be landscaped would need the most attention to guarantee that no contaminated soil would be near the surface.

Pros

The underlying soil is highly impermeable clay, so mobility is lessened.

The contaminants of concern are relatively immobile.

The planned construction on the site could be designed to provide a capping function that would prevent contact.

The costs for this option are low.

Cons

Further analysis of samples would be necessary to show the presence or absence of PNA's, which are the true compounds of concern since some are suspected carcinogens. These compounds were detected in some of the material previously removed from the site.

Regulatory approval would be required to exercise this option. First, DOHS would determine the level of risk involved. The material would need to be classified, and if it was determined to be a RCRA waste a lengthy permit process would ensue. If it is only a hazardous material, then the Regional Water Board would need to determine if it was an acceptable discharge to land.

The time required to gain approval is unknown as there is no maximum time allowed for a response from the agencies.

2. PLACE IN A CELL

This option would require the moving and burial of all

material in one location. Otherwise it is similar to leaving in place.

Pros

The material would be better contained due to its being placed under controlled conditions.

The material could be retrieved without damage to the building, if at some time in the future this would be required.

Cons

The cost to accomplish this would be significant and it would delay construction of the building.

The same regulatory approvals would be required as in Option 1., above.

3. BIOREMEDIATE IN PLACE

This could be accomplished by the use of electro-osmosis to move the nutrients and micro-organisms through the near surface soil. A network of wells would serve as injection and withdrawal points and also as the anodes and cathodes of the system. The movement of the fluids would be horizontally between wells.

Pros

The contamination could be eventually reduced to suitable levels.

Cons

The clays would swell upon introduction of the fluids and have a negative effect on the building foundation.

The installation of the well system would require additional time and expense.

The operation of the system could require years to accomplish the desired reduction.

Regulatory approval would still be required.

The successful bioremediation of PNA's is not a certainty.

4. BIOREMEDIATE IN A CELL

Due to the quantities involved, costs for a liner would prove prohibitive so the cell could be constructed in the native clay soil which exhibits suitably high impermeabilities. The electro-osmosis system would be employed but the anode and cathode would be horizontal and the flow of liquids induced in a vertical direction.

Pros

The material would eventually be treated to desired concentrations.

Cons

The size of the cell would require a large portion of the site and construction would disrupt the start of the building.

The time to achieve desired end results is unknown.

Regulatory approval would still be required.

5. DISPOSE OFF-SITE

Disposal could be accomplished in a Class III landfill or in an asphalt production facility.

Pros

The material would be completely removed from the site.

Cons

The costs for removal and disposal would be significant.

There would be some potential long-term liability with disposal in a Class III site, but since the material would not be shipped under a manifest, tracing it would be difficult.

6. DILUTION

To accomplish this option, the known levels of highly

contaminated soil could be excavated and then either treated or taken to a disposal or to an asphalt recycler. The lower levels of soil could then be scarified using heavy equipment to mix the soil. Compaction would be necessary to lay the soil back in place.

Pros

This option would reduce the amount of soil to be treated or placed in a disposal, therefore, reducing the cost of the project.

The time frame for this would be minimal, limiting the delay of construction of the building.

Regulatory approval would not be necessary.

Cons

Further sample analysis would be necessary to show desired levels of contamination in the mixed soil, and also to show the removal of the high levels of contamination.

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WORD PROCESSING REQUEST FORM

PLEASE KEEP THIS FORM WITH DOCUMENT

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Author

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Type and Title of Document

Department

21795286
Project Number

Coke
Project Name

	Date and Time Submitted	Date and Time Needed	Clerical Time Spent
1st Draft	9/18		
2nd Draft			
3rd Draft			
4th Draft			
FINAL			

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OVERTIME AUTHORIZATION ☐

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September 14, 1989

Raul Ramirez
Coca-Cola Enterprises West
1334 Central Avenue
Los Angeles, CA 90221

RE: COSTS FOR REMEDIATION; 19875 PACIFIC GATEWAY DRIVE; JOB NO. 2179J286.

Dear Raul:

This letter sets forth the costs to perform certain of the soil remediation options previously outlined in our letter of September 5, 1989.

Costs to excavate and backfill and also to provide on-site bioremediation or codisposal in an asphalt facility are detailed following. The costs are all based on the assumption that 5000 cubic yards of material will be processed.

EXCAVATE AND BACKFILL

We propose to excavate the contaminated soil and stockpile it elsewhere on the site so that it will not interfere with construction of the building. The excavation will be performed in an orderly fashion controlled by surveying methods to minimize removal of any uncontaminated material. Sampling and analysis will be performed as successive layers of soil are removed until the results of sampling ~~so~~ show no contaminated material remains, at which time the excavations will be backfilled with clean, compacted fill taken from elsewhere on the site.

Excavation	$ 85,000
Sampling and Analysis	7,500
Surveying Control	3,500
Backfilling	15,000
TOTAL	$111,000

300 000544

ON-SITE BIOREMEDIATION

This process was described in our earlier letter. Costs to perform this option have been determined to be as follows:

Excavate and Compact Cell Walls	$ 38,000
Install Synthetic Liner	70,000
Install Leak Detection System(under liner)	15,000
Place contaminated soil in liner	25,000
Install fluid handling system	62,000
Install Bioreactor	15,000
Install Electro-osmosis System	19,000
Install Compacted Cover over the cell	20,000
Dose with Bacteria and Nutrients	14,000
Dispose of surplus soil from construction of the cell	45,000
Engineering and Project Management	40,000
Total	$363,000

The above costs do not include operation or sampling of the bioremediation process after initial start-up or sampling and analysis to confirm that the bioremediation process has been completed.

The major uncertainty for this option is the time required to receive permits from the two State agencies involved. For this reason costs for a second option that has no negative time constraints are included following.

CODISPOSAL IN ASPHALT PRODUCTION FACILITY

An asphalt production plant has been identified in Wilmington, CA that is permitted to take in soil contaminated with hydrocarbons and blend it into its asphalt products. Costs for this are as follows:

Transportation	$ 90,000
Disposal Fees	425,000
Total	$515,000

We trust that this information is sufficient for your needs at this time. Please contact us with any questions or comments.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

/weh

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Install Bioreactor	15,000
Install Electro-osmosis System	19,000
Install Compacted Cover over the Cell	20,000
Dose with Bacteria and Nutrients	14,000
Dispose of Surplus Soil from Construction of the Cell	45,000
Engineering and Project Management	40,000
Total	$363,000

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Excavation	$ 85,000
Sampling and Analysis	7,500
Surveying Control	3,500
Backfilling	15,000
TOTAL	$111,000

300 000548

ON-SITE BIOREMEDIATION

This process was described in our earlier letter. Costs to perform this option have been determined to be as follows:

Excavate and Compact Cell Walls	$ 38,000
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/weh

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

September 7, 1989

Mr. Ed Todd
Coca-Cola Enterprises
One Coca-Cola Plaza N.W., 1017A
Atlanta, Georgia 30313

RE: WEEKLY PROJECT STATUS REPORT.

Dear Ed:

A brief summary of this weeks activities at each facility is presented below. All proposed work is subject to your authorization.

San Francisco, CA: Abandonment of the tanks located beneath 11th Street began on August 30, 1989. So far, one tank has been located. This tank will be triple rinsed and grouted on September 5, 1989. This tank was not in the area previously delineated by Harding-Lawson and Associates (HLA). Preliminary excavations to locate the remaining tanks have been unsuccessful at the locations defined by HLA and locations extrapolated by WTI based on the location of the one known tank. These remaining tanks may not exist. Additional work including quarterly sampling of the existing groundwater monitoring wells will continue during the week of September 4 through 8.

A draft Site Characterization Report has been delivered to you. WTI is waiting for comments prior to finalizing the report. Work on a draft Remedial Action Plan is progressing.

San Diego, CA: Draft Site Characterization Report and Remedial Action Plan are in final review. Documents should be sent out to CCE personnel by September 8.

Fresno, CA: Work plan submitted by RSI has been approved subject to conducting additional site characterization. WTI is currently scheduling additional assessment activities for the week of September 18, 1989.

Torrance, CA: According to Raul Ramirez, grading plans are to be available September 5, 1989. WTI will begin removing remaining buried pipes from the site around September 7, 1989. Tentative date to begin removal of contaminated soil is September 11, 1989. Recent letter from the county regulators indicated a desire to review any planned remedial activities. This may slow construction/implementation of the cell but will not effect the construction schedule of the building.

Medford, OR: No activity.

Yuma, AZ: Replacements for the influent/effluent pumps damaged during recent storms have arrived and will be installed on September 5, 1989. Quarterly sampling and periodic maintenance on the product ejectors is scheduled for September 11 through 15.

Oxford, AL: Drilling of the extraction wells to be used for the pump tests are completed. Additional monitoring wells will be installed during the week of September 4 through 8. Concurrent with the well installation, an OVA soil gas survey will be conducted to evaluate the southern extent of the plume. Aquifer testing should start about September 11. Final remedial design will be based on the aquifer testing data.

West Point, GA: WTI will conduct an OVA soil gas survey during the week of September 4 through 8. A quarterly groundwater sampling report of the existing monitoring wells is being developed.

Worcester, MA: WTI has received a copy of the investigation conducted by Chemcycle dated August 1989. WTI will review and advise in writing by September 8, 1989.

Dallas, TX: Maxim Engineers has replaced well MW-13. WTI was not notified and was not on-site to supervise or observe. No other activity on this site. Current plans are to conduct a pump test at the facility on September 14 and 15.

Tyler, TX: Soil gas survey has been completed by WTI. Preliminary data suggests a very limited soil contamination problem. One well suspected by Maxim Engineers of containing MEK and MIBK was resampled by WTI. No trace of MEK or MIBK was detected in WTI's samples down to 10 ppb. This was verified by both GC/FID direct injert and GC/MS Solvent Screen methods. Conclusion is Maxim's laboratory is evaluating the test results incorrectly. WTI has recommended a pump test to determine size, number, and location of groundwater extraction wells necessary to remediate the entire plume in an effective manner. Pump test is tentatively scheduled for the week of September 18-22.

Marshall, TX: Soil gas survey has been completed by WTI. Due to extremely tight formations beneath the site, limited data was generated regarding the extent of soil contamination. Several wells suspected by Maxim Engineers of containing MEK and MIBK were resampled by WTI. Analytical data indicates no MEK or MIBK concentrations down to 10 ppb. Conclusion is Maxim's laboratory has incorrectly evaluated the data. This is unfortunate since Maxim has already reported this data to the TWC and City of Marshall. WTI's data indicates some contamination has spread north across the street. WTI has recommended a pump test to determine the size, number, and location of extraction wells to remediate the plume effectively. Pump test is tentatively scheduled for the week of September 18-22.

Beaumont, TX: WTI has scheduled a soil gas survey to start on September 5. Following the soil gas study, a pump test will be performed to determine the size, number, and location of groundwater extraction wells to effectively remediate the plume. Pump test is tentatively scheduled for the week of September 18-22. WTI is preparing a quarterly report using most recent water levels and chemical data.

Liberty, TX: Analytical test results of groundwater samples indicate no BTEX contamination above detection levels. Low level TPHC contamination was detected but is attributed to back ground levels. WTI is planning some additional soil sampling the week of September 4-8. If no soil contamination is detected, site will be closed.

Hollywood, FL: A comprehensive site visit was conducted on August 16. Groundwater levels and free product thickness were measured. While on-site, WTI observed a technician from Blasland, Bouch, and Lee (BB&L) bailing free product from several of the wells. WTI's conclusions are that the manual removal of product from the aquifer (especially a drinking water aquifer) is inadequate. Several wells were found to be improperly constructed (bentonite in 4 wells, 2 wells were dry or nearly dry). Eleven wells were apparently destroyed by a road grader during construction of a truck wash and repair shop.

According to BB&L, groundwater sampling has not been completed in the last 4 months. In addition, the currently inoperative remediation system is to small and incorrectly located to capture or contain the plume. WTI has scheduled groundwater sampling to occur during the week of September 11-15. This should continue on a monthly basis to monitor the condition of the aquifer. WTI requests data from a pump test reportedly performed by BB&L. Based on that data, WTI will develop a revised Remedial Action Plan to remediate the plume effectively.

Miami, FL (Distribution Center): This facility was inspected on August 17. All existing monitoring wells were destroyed by recent work completed on the underground storage tanks (removal, repair, replacement?). Five new wells are reportedly planned by BB&L. WTI recommends that we review locations prior to installation of the wells. At least 3 wells should be located downgradient. In addition, a complete soil/groundwater contamination assessment report should be prepared. WTI is tentatively scheduling this work for the week of September 18-22.

Miami, FL (Service Station): This facility was inspected on August 17. Numerous safety hazards were observed on the site. In accordance with WTI's recommendations, a fence was installed on the site. WTI has also recommended a full contaminant assessment program be implemented. This work is currently scheduled for the week of September 25-29.

St. Augustine, FL: This facility was inspected on August 18. Four existing monitoring wells were located on the site. Approximately 2.34 feet of free product was found in Well MW-3. This is a reduction in product thickness from the 4 feet reported in June, 1989. This decrease most likely represents lateral migration of the product rather than significant product removal as a result of manual bailing. Manual bailing is currently occurring twice a week by Coca-Cola personnel. Both soil and groundwater contamination appear to be migrating off-site to the northeast. To increase product removal efficiency, WTI recommends immediate installation of an automated product recovery system. This work is tentatively scheduled for the week of September 18-22. A complete contaminant assessment program should be implemented. WTI has scheduled this work to begin during the week of October 2-6.

Harrisburg, PA: Existing on-site monitoring well will be sampled during the week of October 2-6. Concurrently, additional subsurface exploration will be conducted to locate 10,000 gallons of fuel oil which were lost due to contractor error. WTI recommends that CCE attorneys be involved to pursue cost recovery from the contractor responsible.

Lancaster, PA: Existing on-site monitoring well will be sampled during the week of October 2-6.

Capitol Heights, MD: Existing monitoring wells are known to be contaminated. WTI will sample these wells to quantify contaminant levels. This work is tentatively scheduled for the week of September 25-29.

Lansing, MI: Existing on-site monitoring wells will be sampled during the week of September 25-29.

Coca-Cola Enterprises

As always it is a pleasure to be of service to you and Coca-Cola Enterprises. If you have any questions or need additional information, please don't hesitate to call us at (602) 437-3737.

Sincerely,

WESTERN TECHNOLOGIES INC.

Steven M. Myers

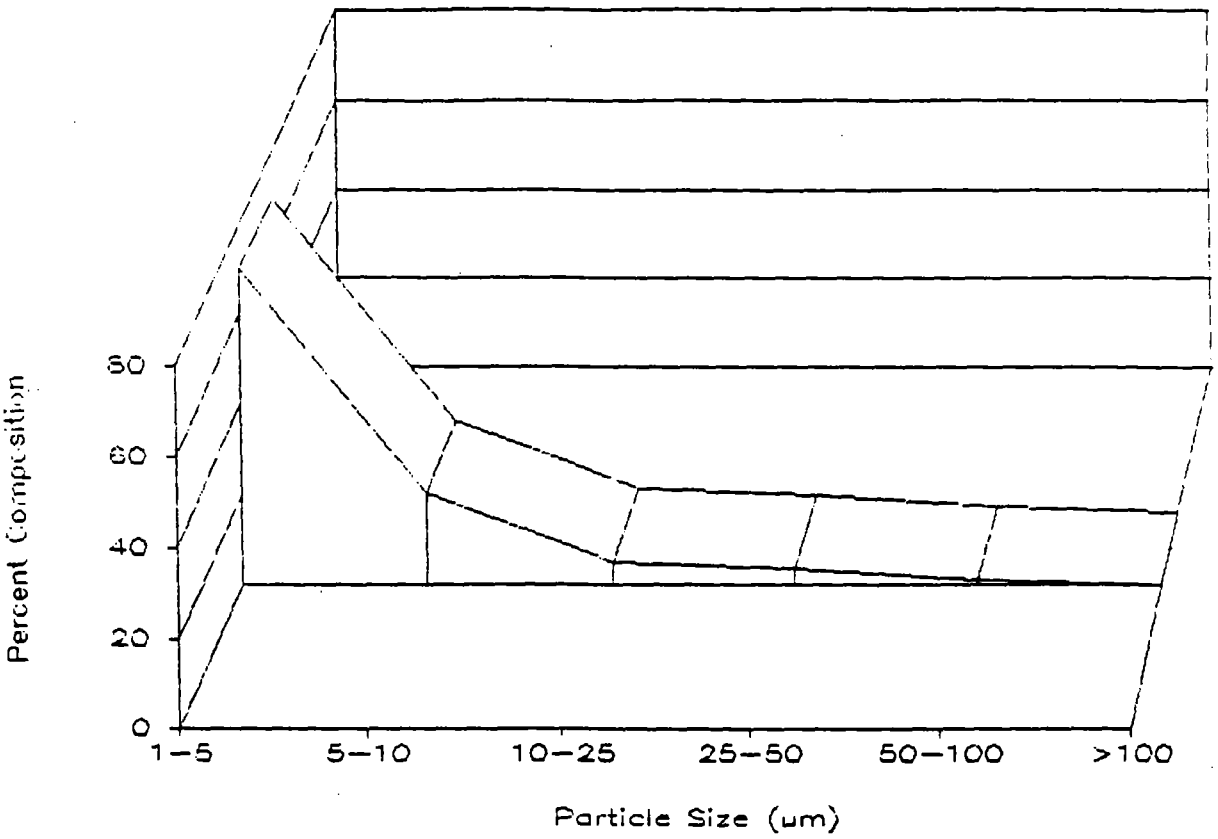
Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

cc: Doc Quinn

PARTICLE SIZE DISTRIBUTION

Filter Residue



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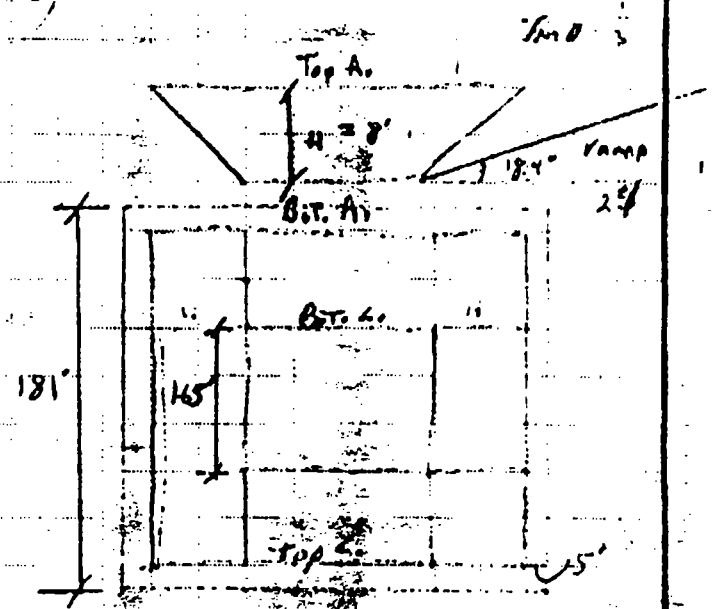
VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB [illegible]
SHEET NO. 1 OF
CALCULATED BY MEO DATE 9/7/89
CHECKED BY DATE
SCALE

Geometry

- For C.Y. to place
- add ±20% [illegible] = [illegible]
- for plumbing assume 2 - 1' layers of sand + pipe = [illegible]
- 8 ft' total depth
- bottom area = [illegible] x 155' = 27,225 [illegible]
- Top Area = 181' x 181' = 32,751 [illegible]
- [illegible] 8000 C.Y. = 215,[illegible] ft³
- Volume of Cell $\frac{\text{Top A.} + \text{Bot. A.}}{2} \times H$



Top A. = $(\text{Bot. L.} + 2H)^2$

Bot. A. = $(\text{Bot. L.})^2$

$\left(\frac{(\text{Bot. L.} + 2H)^2 + (\text{Bot. L.})^2}{2}\right) \times H = 21,[illegible]$

$\frac{[illegible]^2 + [illegible]}{2} \times 8 = [illegible]$

$\text{Bot. L.} + 10)^2 + (\text{Bot. L.})^2 = 5[illegible],000$

Bot. L. = 156.5

Top L. = 172.5

Bot A. = 24,[illegible] ft²

Top A. = 29,756.[illegible] ft²

VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB
SHEET NO. 2 OF
CALCULATED BY MO DATE 9/7/89
CHECKED BY DATE
SCALE

Basic Cell

Liner area (ft²)

Bottom A. = 24,492.3
Top A. = 29,756.3
Sides h. = 11.3' x 6[illegible] = 7,435.4
(Top - bottom) Trench = (33,306.3 - 29,756.3)2 = 7,100.0

Total Area = 68,784.0 ft² @ $1/ft² = $68,784

Excavation for Cell $2/C.Y.

5000 Yd³ + 5' cover (5' x 33,306.3 (ft²) + ramp
= 15,000 C.Y. @ $2/C.Y.

$30,000

Compacted Cover (from excavation) @ $3/Yd³

5' x 33,306.3 (ft²) = 166,531.5 [illegible] = 6,168 C.Y.

= $19,000

OFF Haul Balance of material @ $5/C.Y.

15,000 - 6000 = 9000 C.Y. = $45,000

Leak Detection System below liner

Lysimeters
1/1600 ft² = 20 @ $62.50 = $1,250
Service kit = $500
Tubing 8000 ft @ 1.17 $/ft = $9,3[illegible]
Installation $2000 = $2[illegible]
$13,110

or

Standard System
gravel $.25/ft² x 24,500 ft² = $6,125
piping 1,727 ft @ [illegible] = 3[illegible]
sump + pump = $3000
$12,147

Soilmoisture Equip. Corp.
P.O. Box 30025
Santa Barbara, CA 93105
805-964-3525

300 000557

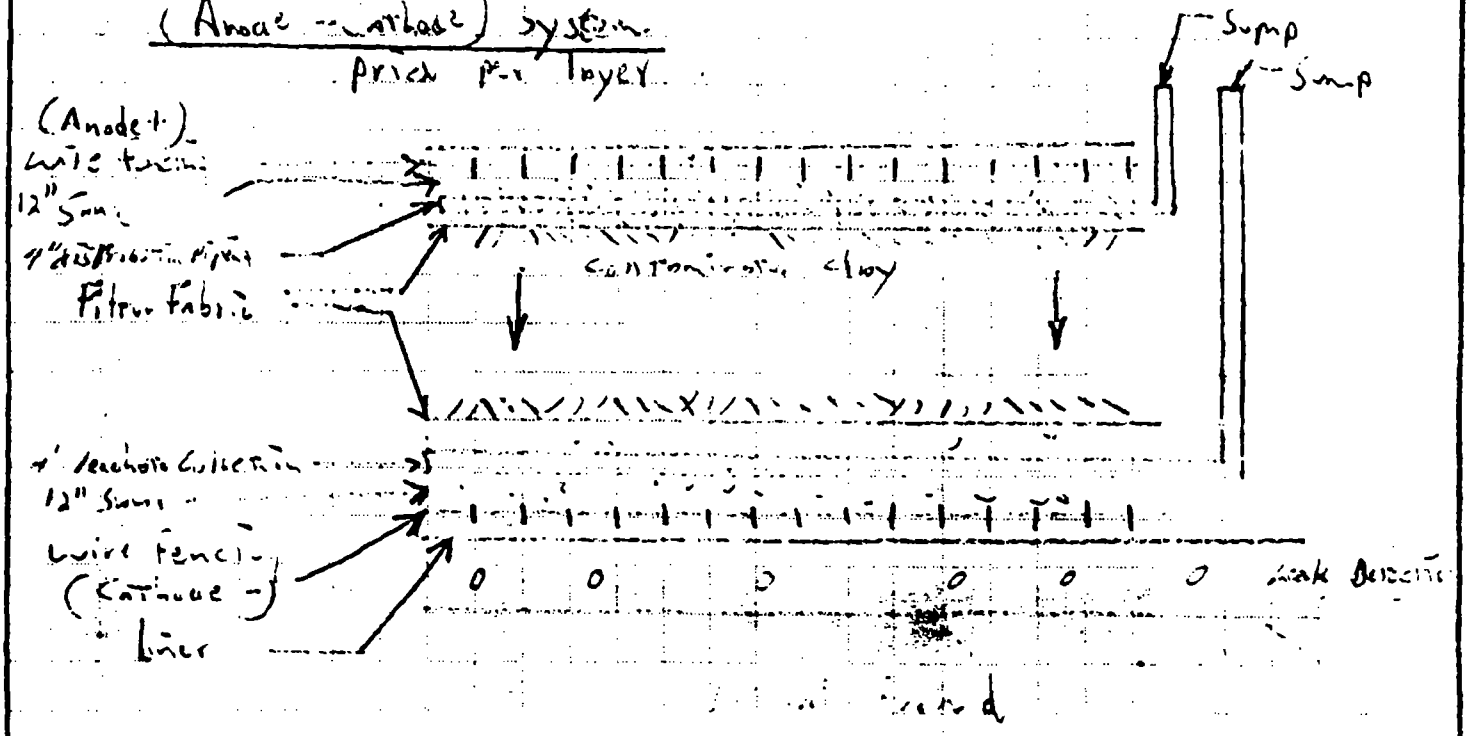
Total $78,000

PRODUCT 208-A VECTOR Inc. Groton, Mass. 01471. To Order PHONE TOLL FREE 1-800-225-6380

VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB 89107.0 Bioremediation
SHEET NO. 3 OF
CALCULATED BY MO DATE 9/2/89
CHECKED BY DATE
SCALE

(Anode - Cathode) system
price per layer



- 2 Sumps + Pumps = $3000 $6,000 = $6000
- 2 piping networks 1,727 ft @ 1.75 $/ft $6,045 = $6045
- sand blankets (2)
  1.0 x 24,500 ft² = 24,500 ft³
  1 x 29,800 ft² = 29,800 ft³
  54,300 ft³ = 2012 CY @ $15/CY.

- filter fabric = $31,000
  Top 30,000 ft²
  bottom 24,500 ft²
  54,500 ft² @ $.20 = $10,900

- Wire fence (Anode + Cathode) = $13,625
  Top 30,000 ft² $.25/ft²
  bottom 24,500 ft²

- electrical work = $5000
  DC converter, voltage regulator, wiring

300 000558

VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB 89107.0
SHEET NO. 4 OF
CALCULATED BY MEO DATE 9/7/89
CHECKED BY DATE
SCALE

OTHER COSTS

Temporary Fence	$2/ft x 1000' + 1300' =	$4,600
Engineering		10,000
Bacteria + Nutrients		
		267,000 + bugs

300 000559

PRODUCT 200-4 (Pendaflex) Inc., Groton, Mass 01471 To Order PHONE TOLL FREE 1-800-[illegible]

Additional Items

recompact cell $.25 / s.f.

32,000 ft² x .25 = $8,000

Geogrid for Sidewall $.25 / s.f.

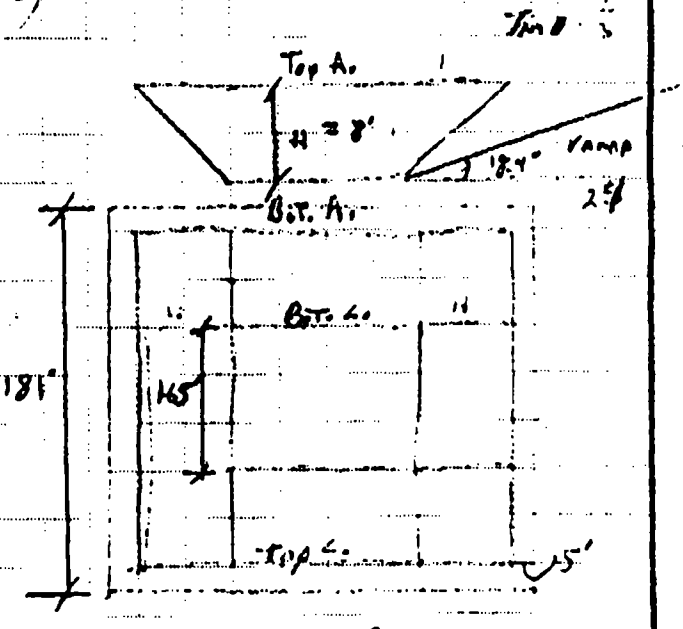
7,495 ft² x .25 = $1,900

VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB 5'107.1
SHEET NO. 1 OF
CALCULATED BY MEO DATE 9/7/89
CHECKED BY DATE
SCALE

Geometry

- 500 C.Y. to place
- add ±20% [illegible] = 1000 C.Y.
- for plumbing assume 2 - 1' layers of sand + pipe = 2000 C.Y.
- 8 ft' total depth
- bottom area = 165' x 165' = 27,225 ft²
- Top Area = 181' x 181' = 32,761 ft²
- [illegible] 8000 C.Y. = 216,000 ft³
- Volume of Cell $\frac{\text{Top A.} + \text{Bot. A.}}{2} \times H$



$$\text{Top A.} = (\text{Bot. L.} + 2H)^2$$

$$\text{Bot. A.} = (\text{Bot. L.})^2$$

$$\left(\frac{(\text{Bot. L.} + 2H)^2 + (\text{Bot. L.})^2}{2}\right) \times H = 216,000$$

$$\frac{(\text{Bot. L.} + 16)^2 + (\text{Bot. L.})^2}{2} \times 8 = 216,000$$

$$(\text{Bot. L.} + 16)^2 + (\text{Bot. L.})^2 = 54,000$$

Bot. L. = 136.5 Bot A. = 24,492.3 ft²

Top L = 172.5 Top A. = 29,756.3 ft²

300 000561

VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB [illegible]
SHEET NO. 2 OF
CALCULATED BY MO DATE 9/7/89
CHECKED BY DATE
SCALE

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Compacted Cover (from excavation) @ $3/Yd³

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= $19,000

OFF HAUL Balance of material @ $5/C.Y.

15,000 - 6000 = 9000 C.Y. = $45,000

Leak Detection System below liner

Lysimeters
1/1600 ft² = 20 @ $62.50 = $1,250
Service kit = $500
Tubing 8000 ft @ 1.17 $/ft = $9,360
Installation $2000 = $2,000
$13,110

or

Standard System
gravel $.25/ft² x 24,500 ft² = $6,125
piping 1,727 ft @ [illegible] = 3[illegible]
sump + pump = $3000
$12,147

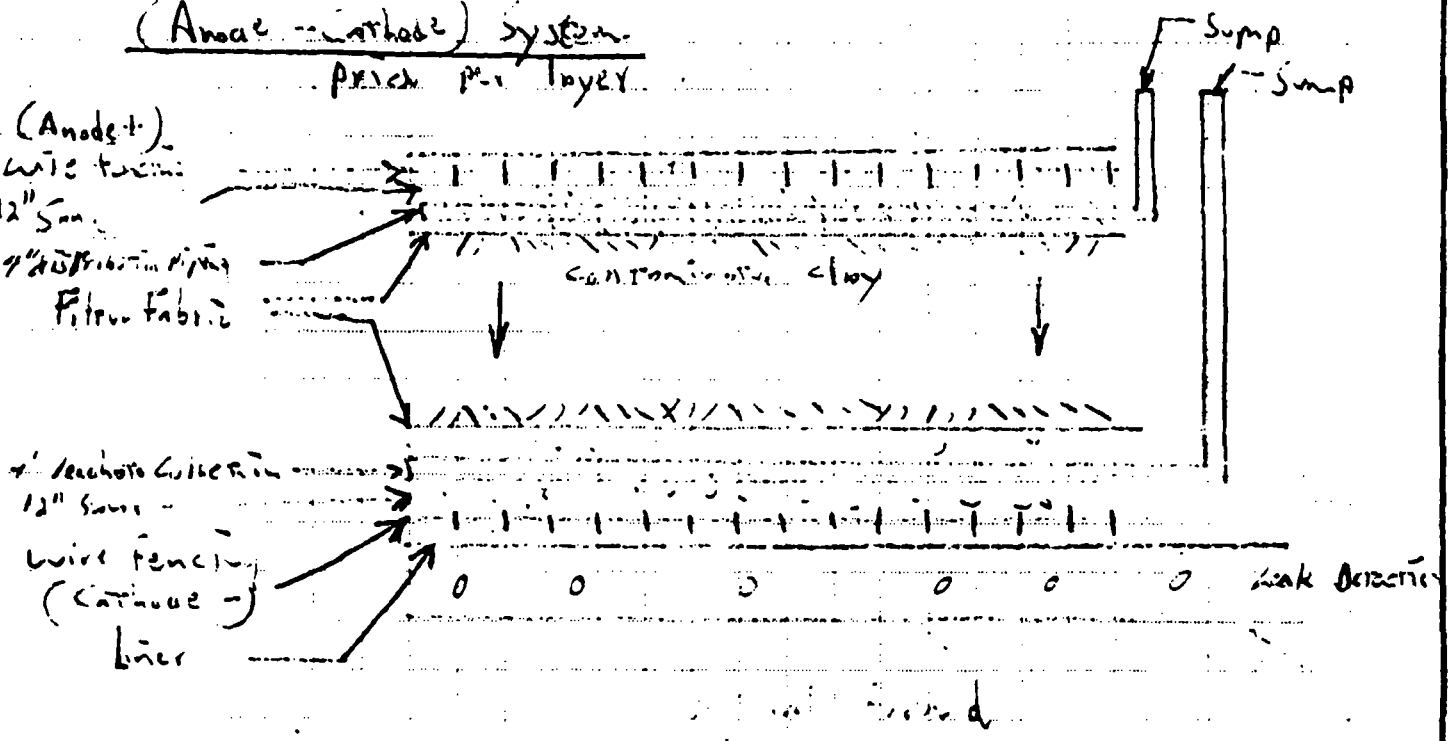
Salmoisture Equip. Corp.
P.O. Box 30025
Santa Barbara, CA 93105
805-[illegible]

300 000562

VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB 89107.0 Bioremediation
SHEET NO. 3 OF
CALCULATED BY MO DATE 9/2/89
CHECKED BY DATE
SCALE

(Anode - Cathode) System
Prices per layer



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54,300 ft³ = 3012 cy @ $15/cy.

-- Filter fabric = $31,000
Top 30,000 ft²
bottom 24,500 ft²
54,500 ft² @ $.25 = $10,900

-- Wire fence (Anode + Cathode) = $13,625
Top 30,000 ft² $.25/ft²
bottom 24,500 ft²

-- electrical work = $5000
DC converter, voltage regulator, wiring

300 000563

VECTOR ENGINEERING, INC.
625 Margrave Drive, 2nd Floor
RENO, NV 89502
(702) 825-5577

JOB 89107.0
SHEET NO. 4 OF
CALCULATED BY MEO DATE 7/7/89
CHECKED BY DATE
SCALE

OTHER COSTS

Temporary fence	$2/ft × 1000' + 1300' =	$4,600
Engineering		10,000
Bacteria + Nutrients		

267,000 + bugs

Additional Items

Recompact cell $.25 / s.f.

32,000 ft² x .25 = $8,000

Geogrid for Sidewall $.25 / s.f.

7,435 ft² x .25 = $1,900

CCE-West
1334 South Central Avenue
Los Angeles, CA 90021
213 746-5555

CCE-West

September 7, 1989

Stoney-Miller Consultants, Inc.
14 Hughes, Suite B-101
Irvine, California 92718

Attention: Mike Miller

Re: **19875 Pacific Gateway**

Dear Mike:

As you are aware, Western Technologies, Inc. will be taking over the remediation of the contaminated soil at our Pacific Gateway site. The geotechnical work will be done by your company unless otherwise notified.

Please let me know who will be my contact.

Sincerely,

CCE-West

Raul Ramirez

Raul Ramirez, Manager
Facilities Department

RR:rp

CC: Western Technologies, Inc.
Cadiz & Cadiz, Architect

300 000566

RECEIVED
SEP 15 1989
WESTERN TECHNOLOGIES, INC.
PHOENIX, ARIZONA

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

September 5, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: 19875 PACIFIC GATEWAY DRIVE, COORDINATION OF PIPELINE EXCAVATION. JOB NO. 2179J286.

Dear Raul:

At your request I have contacted Mike Miller of Stoney-Miller Consultants to inform him that we plan to excavate and remove the abandoned, buried pipelines on the Torrance site.

He stated that his requirements in regard to this work would be to have a technician from his firm on-site at all times that backfilling and compaction operations were underway. The technician would measure the density of the compacted fill to assure completeness of compaction.

Additionally, Mike requested that he be given copies of any on-going correspondance regarding this project so that he is kept informed.

Please inform us how you wish to proceed in these matters. The pipelines should be removed as soon as practicable.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Michael L. Sewell for
Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
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(602) 437-3737

September 5, 1989

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Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G. for
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

WESTERN TECHNOLOGIES INC.

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P.O. Box 21387
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September 5, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: 19875 PACIFIC GATEWAY DRIVE, DELIVERABLES FROM GARY CARLIN. JOB NO. 2179J286.

Dear Raul:

One of the items of information that we need before beginning excavation in the area where hydrocarbons were detected are the formalized boring logs and sub-surface cross-sections that Gary Carlin and his staff are preparing from the work they have already performed on the site.

We require these at least one calendar week before excavation of the subject area can begin. This phase is now scheduled to start September 11, 1989.

Also along the same line, we have not yet received the qualifications of the contractor you have had bid on this work. We require this information by September 5, 1989 so that a qualified contractor is in place to start this phase of the work.

Please respond to these needs so that there is no delay in the schedule.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

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3737 East Broadway Road
P.O. Box 21387
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September 5, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: 19875 PACIFIC GATEWAY PLAZA, REMEDIATION OF SOIL, LIST OF OPTIONS. JOB NO. 2179J286.

Dear Raul:

Following is a short description of the various options that we are investigating for treatment of soil on the subject site. These are the viable options remaining after our initial screening determination where a number of scenarios have been eliminated due to costs or infeasibility. They are listed in no particular order of importance.

Please note that all the options require that the contaminated soil be excavated and stockpiled on an area of the site so as not to interfere with the timely construction of the building.

DISPOSE OFF-SITE

Chemical analyses can be performed that would allow the soil material to be disposed of in a Class III landfill as non-hazardous material without any manifests or recordation of the material as waste. This could be accomplished in a comparatively short time with minimal impact on construction activities on the site.

Additional laboratory testing to certify the non-hazardous nature of the material would be required to pursue this option further.

BIOREMEDIATE ON-SITE

The soil material can be placed in a below-grade, lined cell constructed in a low-use area of the site. As the soil is placed, a suitable liquid distribution system would be installed to allow addition of nutrients and oxygen to the soil. The object of this approach is to enhance the growth of hydrocarbon consuming micro-organisms.

Once placed in the cell, the soil material would be capped to allow use of the area of the site directly above the cell. An above ground pump-and-treat system would be required to force the nutrient bearing liquids through the contents of the cell and to treat the hydrocarbon components carried out in the waste stream. Once sampling and analysis showed the bioremediation to be complete, the operation would stop and the cell could be left in place.

One draw-back to this option is the uncertainty as to the length of time required to carry out the bioremediation to acceptable levels. The second, more significant, constraint is that permits are required from both the Los Angeles Department of Health and also the California Regional Water Quality Control Board. The time to acquire these permits is undetermined.

The additional work required to pursue this option would be bench scale testing to determine optimum methods to improve the permeability of the soil.

CHEMICAL STABILIZATION

The soil material could be mixed on-site with an additive that would serve to chemically bond and encapsulate the hydrocarbon fractions. The additive consists mostly of cement with some lesser fraction being proprietary material. This method does not alter or remove the hydrocarbon material but ties it up so that it does not "appear" to be there when chemical analysis is performed. A similar process exists that uses an organic polymer instead of cement. The benefit to using the polymer is that the volume increase due to the use of the additive is less than with cement.

Once the stabilization is performed, the soil could be left on-site or disposed off-site in a Class III non-hazardous landfill.

The additional work required to pursue this option would be treatability studies performed to optimize the additive make-up and dose rate.

CODISPOSAL IN ASPHALT PRODUCTION FACILITY

The soil material could be added to the raw feed stream of the kiln of an asphalt plant. This would constitute recycling of the hydrocarbon constituents and be a permitted use.

One constraint is that there are only a few plants in the area that are large enough to do this as the material can only be added at a rate of 5% or less of the total product volume.

Additional work required to pursue this option would be bench testing with some chemical analyses, as there might be some additives that would make the soil more acceptable for this process.

OPTIONS LESS FEASIBLE

Included for your information are the options considered but rejected in favor of those more practical. The options and the reasons for rejection are listed following.

Bioremediation of the soil on the surface of the site. Rejected due to time and space required.

Bioremediation of the soil on another site. Rejected due to unavailability of a site.

Soil-washing of the soil to remove the hydrocarbon constituents. Rejected due to costs.

Incineration on- or off-site. Rejected due to costs and also permitting constraints for on-site operations.

Thermal desorption or aeration of the hydrocarbons. Rejected due to low volatility of the hydrocarbon components.

COSTS

At this time the exact costs for each option are undetermined, but the following general range of costs can be given.

For disposal in a Class III landfill, costs are in the $50.00/cu. yd. range. Costs for the other options under consideration are in the $100.00/cu. yd. range. Costs for some of the options rejected ranged from $350.00 to $1100.00/ cu. yd. These costs are all +/-30% at this point.

Coca-Cola Enterprises - West
Job No. 2179J286

Please review this report at your earliest convenience and discuss it with any other Coca-Cola personnel that have input into decisions made regarding the Torrance site. We will continue to develop more exact costs for the four feasible options listed above unless we are notified otherwise.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

September 5, 1989

Raul Ramirez
Coca-Cola Enterprises - West
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Los Angeles, California 90021

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Steven M. Myers, R.G.
Director, UST and Groundwater Programs
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/weh

WESTERN TECHNOLOGIES INC.

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September 5, 1989

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September 5, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

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Coca-Cola Enterprises - West
Job No. 2179J286

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Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

September 5, 1989

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DISPOSE OFF-SITE

Chemical analyses can be performed that would allow the soil material to be disposed of in a Class III landfill as non-hazardous material without any manifests or recordation of the material as waste. This could be accomplished in a comparatively short time with minimal impact on construction activities on the site.

Additional laboratory testing to certify the non-hazardous nature of the material would be required to pursue this option further.

BIOREMEDIATE ON-SITE

The soil material can be placed in a below-grade, lined cell constructed in a low-use area of the site. As the soil is placed, a suitable liquid distribution system would be installed to allow addition of nutrients and oxygen to the soil. The object of this approach is to enhance the growth of hydrocarbon consuming micro-organisms.

Once placed in the cell, the soil material would be capped to allow use of the area of the site directly above the cell. An above ~~ound pump-and-treat system would be required to force the nutrient bearing liquids through the contents of the cell and to treat the hydrocarbon components carried out in the waste stream. Once sampling and analysis showed the bioremediation to be complete, the operation would stop and the cell could be left in place.

One draw-back to this option is the uncertainty as to the length of time required to carry out the bioremediation to acceptable levels. The second, more significant, constraint is that permits are required from both the Los Angeles Department of Health and also the California Regional Water Quality Control Board. The time to acquire these permits is undetermined.

The additional work required to pursue this option would be bench scale testing to determine optimum methods to improve the permeability of the soil.

CHEMICAL STABILIZATION

The soil material could be mixed on-site with an additive that would serve to chemically bond and encapsulate the hydrocarbon fractions. The additive consists mostly of cement with some lesser fraction being proprietary material. This method does not alter or remove the hydrocarbon material but ties it up so that it does not "appear" to be there when chemical analysis is performed. A similar process exists that uses an organic polymer instead of cement. The benefit to using the polymer is that the volume increase due to the use of the additive is less than with cement.

Once the stabilization is performed, the soil could be left on-site or disposed off-site in a Class III non-hazardous landfill.

The additional work required to pursue this option would be treatability studies performed to optimize the additive make-up and dose rate.

CODISPOSAL IN ASPHALT PRODUCTION FACILITY

The soil material could be added to the raw feed stream of the kiln of an asphalt plant. This would constitute recycling of the hydrocarbon constituents and be a permitted use.

One constraint is that there are only a few plants in the area that are large enough to do this as the material can only be added at a rate of 5% or less of the total product volume.

Additional work required to pursue this option would be bench testing with some chemical analyses, as there might be some additives that would make the soil more acceptable for this process.

OPTIONS LESS FEASIBLE

Included for your information are the options considered but rejected in favor of those more practical. The options and the reasons for rejection are listed following.

Bioremediation of the soil on the surface of the site. Rejected due to time and space required.

Bioremediation of the soil on another site. Rejected due to unavailability of a site.

Soil-washing of the soil to remove the hydrocarbon constituents. Rejected due to costs.

Incineration on- or off-site. Rejected due to costs and also permitting constraints for on-site operations.

Thermal desorption or aeration of the hydrocarbons. Rejected due to low volatility of the hydrocarbon components.

COSTS

At this time the exact costs for each option are undetermined, but the following general range of costs can be given.

For disposal in a Class III landfill, costs are in the $50.00/cu. yd. range. Costs for the other options under consideration are in the $100.00/cu. yd. range. Costs for some of the options rejected ranged from $350.00 to $1100.00/ cu. yd. These costs are all +/-30% at this point.

Coca-Cola Enterprises - West
Job No. 2179J286

Please review this report at your earliest convenience and discuss it with any other Coca-Cola personnel that have input into decisions made regarding the Torrance site. We will continue to develop more exact costs for the four feasible options listed above unless we are notified otherwise.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

THORNE ENVIRONMENTAL
A TG Company

September 1, 1989

Mr. Peter Beaver
Western Technologies
P.O. Box 21387
Phoenix, AZ 85036

Y89-209

Dear Mr. Beaver:

Per Woody Gibson's request, I am submitting this proposal for a benchscale test of soils contaminated with a tar-like substance in Torrance, California.

PROJECT UNDERSTANDING

Western Technologies of Phoenix, AZ has a client in Torrance, California, who is the owner of property that is going to be developed. On the property is approximately 5000 cubic yards of soil impacted with a tar-like substance. Apparently, the California State Department of Health Services considers this soil to be hazardous and will only allow it to be transported off-site under a hazardous waste manifest unless it is tested to their standards.

The property owner does not want to possess any liability for this material, therefore, we are proposing two methods to treat this material.

SCOPE OF SERVICES

Thorne Environmental, Inc. with the help of its two divisions, **Biota** and **ToxCo**, proposes to run benchscale tests on the material using two methods:

1. **ToxCo Division** - Chemical Fixation and Solidification. The objective for this treatment process is to lower all hazardous levels of the material so it may remain on-site or be hauled off-site as a non hazardous material to a local sanitary landfill. A five gallon sample will be provided by Western Technologies.

2. **Biota Division** - Bioremediation. The objective for this treatment process is to lower all hazardous levels of the material so it may remain on-site or be hauled off-site to a local sanitary landfill. A five gallon sample will be provided by Western Technologies.

RECEIVED

SEP - 7 1989

WESTERN TECHNOLOGIES, INC.
PHOENIX, ARIZONA

Y89-209.SL3

4887 E. La Palma Ave., Suite 701 • Anaheim, CA 92807 • (714) 693-1818 • Fax (714) 693-1873
"Treatment by Design"

THORNE ENVIRONMENTAL

ESTIMATES OF FEES

The following fee estimates are given to Western Technologies for budgetary purposes. Invoicing will done on a fixed price basis.

1.	Chemical Fixation and Solidification (benchscale test)	$ 5,500
2.	Bioremediation (benchscale test)	$ 6,500

Payment terms are 50% down with the order.

I have enclosed some standard information on the two processes. Please contact me with any questions or comments.

Sincerely,

THORNE ENVIRONMENTAL, INC.

Suzanne Larson

Suzanne Larson
Project Development

SL:lh

Enclosures

Y89-209.SL3

ToxCo

a division of THORNE ENVIRONMENTAL, Inc.

TOXCO CHEMICAL FIXATION AND SOLIDIFICATION PROCESS

The chemical fixation and solidification process (CFS) was developed and designed for the chemical fixation and solidification of complex waste sludges and liquid with the aim of producing a non-toxic, environmentally safe material. After several years of laboratory development and commercial use, the process has now been used to treat more than 100,000,000 gallons of a wide range of waste sludge. The CFS Process utilizes a two-part, inorganic chemical system which reacts with all polyvalent metal ions and with certain other waste components; it also reacts within itself to form a chemically and mechanically stable solid. This system is based on the reaction between sulfides, silicates, and silicate setting agents which react in a controlled manner to produce a matrix from which the metals will not leach.

Toxco

Benchscale Testing

Toxco recommends the testing and treatment of a small quantity of your contaminated soil or sludges to allow optimization of the process for your specific condition. In this way the regulating agencies will see data from your specific site and not be looking at a hypothetical example and your own confidence will be increased.

Analysis of treated soil is performed by a State approved independent laboratory according to procedures established by the U.S. Environmental Protection Agency and [illegible] Health Service [illegible]

Toxco

Metal Recyclers

Serious environmental problems occur throughout the metal recycling industry. Autoshredders and salvage yards, for instance, have been fined and shut down due to toxic waste generation. The autoshredders generate many hundreds of tons of fluff daily loaded with heavy metals. Toxco has the most effective system for fluff treatment.

Toxco

Metal Finishing Companies (Contaminated Soil)

Many plating and galvanizing companies, particularly those over 10 years old, have had tanks leak in the surrounding soils. Toxco's chemical fixation process converts the metallic ions into insoluble compounds and the resulting soil has no heavy metals with soluble components above their Soluble Threshold Limit Concentration.

With an applicable risk assessment and closure plan, sites can be treated and made legally safe for less than one fifth the price of hauling to a supposedly secure dump.

300 000587

4887 EAST LA PALMA AVE. • SUITE 701 • ANAHEIM, CA 92807 • TEL: (714) 693-1818 • FAX: (714) 693-1873

The printed circuit board industry has thousands of plants throughout the United States and Canada that have inadvertently allowed cupric solution to pass into the ground. Even though these practices have been corrected, there remains many sites with contaminated soils that the owners must now correct.

A Southern California printed circuit board manufacturer had soils with copper concentrations of 3,500 mg/kg with 300 mg/L in a soluble form more than 10 times the legal limit of 25 mg/L. After treatment only 0.4 mg/L were soluble. The risk assessment showed that the site could be closed for about 1/5 the money bid for excavation and hauling.

Advantages of the Toxco Process

Elimination of liability associated with Class I disposal.

Reduction of cost by 1/3 to 1/5 the cost of hauling and disposal in a Class I landfill.

Elimination of Hazardous Waste and Hazardous Waste Tax.

Capabilities and Resources

Toxco has effective field management, toxicologists, chemists, and engineering capable of properly supporting project efforts. Among some of Toxco's most significant operations underway or completed are:

Cleanup of 62,000 tons of PCB, lead, cadmium, and zinc laden autoshredder waste: Orange County, California.

Treatment of lead contaminated soil: Northern California.

Treatment of copper and lead contaminated sandblast sand: Northern California.

Treatment of chromium contaminated soil in California.

Treatment of lead contaminated soil: San Diego, California.

Chemical fixation and solidification: series of zinc and lead contaminated sites in California.

CONCEPTUAL PROCESS DESCRIPTION

ON-SITE AND IN-SITU BIOREMEDIATION

Bioremediation, as implemented by the **BIOTA DIVISION**, refers to the technology which utilizes selected species of site-specific native (indigenous) microorganisms along with appropriate inorganic and nutrient supplementation for the cleanup of environmental contaminants in soil and/ or water. The major advantages associated with bioremedial technology include permanent site cleanup (as opposed to landfill disposal, discharge, or volatilization of contaminants), in-situ and/or on-site implementation, substantial economy and cost-effectiveness, and ability to treat a variety of contaminants under diverse environmental conditions.

In general, bioremedial treatment falls under two broad categories. In-situ bioremediation refers to the treatment of soil and/or water in place, without the requirements of excavation, removal, transport, or relocation. In-situ biotreatment is especially beneficial for areas which are difficult to physically access, and/or where both soil and groundwater remediation is required for the same site. On-site bioremediation treatment refers to above ground treatment of the contaminated matrix. Although this is typically soil, above-ground bioreactors may also be utilized for the treatment of water or slurry mixes. It should be noted that both in-situ and on-site methodologies may be integrated as a single treatment system for selected projects under appropriate conditions.

In-situ bioremediation may be implemented for soil, water, or both, depending on regulatory requirements and site-specific characteristics. A particularly advantageous integrated form of in-situ bioremediation makes use of the soil flushing concept in which appropriate buffers, nutrients and microorganisms are pressure injected into and through the treatable soil via a series of appropriately placed injected wells. Hydrogen peroxide may also be injected concurrently (if non-bioinhibitory) to maximize aerobic contaminant degradation. The applied material percolates and leaches through process-compatible soil into contaminated groundwater which is then withdrawn by strategically placed recovery wells and recirculated back through the soil after receiving additional nutrients and/or organisms (as appropriate). The withdrawn material alternatively may be passed through a series of on-site bioreactors and/or carbon canisters for further contaminant bioreduction prior to reinjection or discharge (if acceptable cleanup levels in water have been achieved). This recirculating/recycling process, either with or without bioreactors/carbon canisters, induces bioactivity over a large area of influence by inducing subsurface nutrient and organism dispersion as well as oxygenation (where appropriate). Furthermore, the operational design is such that the potential for off-site migration of contaminants is substantially minimized due to induced aqueous cones of depression and motive flux toward recovery wells. In-situ bioremedial processes have substantial inherent flexibility to accommodate site-specific physical characteristics, contaminant profiles, and diverse biological criteria.

On-site bioremedial treatment of soil generally requires the excavation and layout of treatable material on an impermeable liner to a depth of approximately 18" to 36". Appropriate numbers of soil treatment bays may be prepared in accordance with space availability and the amount of material to be treated. A hydraulic delivery system consisting of appropriately spaced sprinklers and connectors is emplaced around the periphery of the soil treatment bay(s). This delivery system is typically connected to a main water reservoir and a small biomaterials mixing tank. Volume capacities of these tanks are dependant upon site-specific requirements.

At each treatment and process monitoring interval (generally 2 to 4 times per month), defined bioactive materials (buffers, nutrients, and selected native microorganisms) are applied to the surface of the treatment bays via the hydraulic delivery system. Pressure and volume control is designed into the operational system. A clear plastic covering is placed over the soil immediately subsequent to treatment in order to minimize VOC emissions (if volatile HC contaminant), and to induce a biologically active environment by enhancing soil warming and heat retention (greenhouse effect). Soil mixing via ripper, cultivator, or similar device (if aerobic biotransformations are required) is performed immediately prior or subsequent to each biomaterial application to facilitate nutrient/organism dispersion and soil oxygenation.

Treatment of groundwater through the use of bioreactors is similar in concept to the use of fermentors in industry. These devices, in their simplest form, are large canisters which act as microbially-mediated biochemical reaction chambers. Typically, these devices are equipped with internal projections and/or convolutions which induce the formation of biofilms and maximize surface-to-surface interaction between the contaminant(s) and microorganisms. Appropriate nutrient supplementation, aeration/agitation, and temperature regulation afforded by bioreactor systems generally induce rapid and efficient detoxification of contaminants. Appropriate retention time (minimum usually 24-48 hours) of treatable water is required for maximal bioconversion. Therefore, a series of bioreactors is typically used for most applications to ensure sufficient process retention times. One or more carbon canisters may be utilized as a polishing step in order to further reduce contaminant levels prior to effluent re-injection or discharge.

Prior to field implementation of bioremedial cleanup technology, a comprehensive biotreatability investigation on site-specific contaminated soil and/or water is performed. This series of analyses is designed to define and optimize critical features which are influential to the performance and efficiency of in-situ and/or on-site microbially-mediated biotransformations. In addition to isolating and amplifying the capabilities of specific biotransforming bacterial species, these investigations define soil/water biochemical conditions which will be required for effective biodecontamination of the subject material. The analyses performed includes basic soil/water chemistry (pH, potassium, phosphorous, nitrate, nitrite, ammonium), general and selective enumerations, effects of physiochemical parameters on the bioremedial process (pH, temperature, oxygen), organic and inorganic nutrient requirements, bench-scale pilot tests, kinetics optimization, retention time requirements, and end-product characterizations.

PARTIAL PROJECT LISTING

Bioremedial Investigations and Environmental Cleanup Activities (BIOTA, 1986-1989)

BIOTA has provided or is continuing to provide the following bioremedial services to its clients:

- On-site biotreatment of diesel-contaminated soil (Los Angeles, CA)
- In situ biotreatment of diesel-contaminated soil (Las Vegas, NV)
- On-site biotreatment of oil and TCE-contaminated soil (Los Angeles, CA)
- Surface biotreatment of dioxin-containing sludge and wastewater (Little Rock, AR)
- Biofeasibility project review of planned on-site treatment of gasoline-contaminated soil (Phoenix, AZ)
- On-site bioremedial cleanup of nitroaromatic-contaminated soil (San Francisco, CA)
- On-site bioremedial cleanup of gasoline- and diesel-contaminated soil (Los Angeles, CA)
- In situ bioremedial treatment of diesel-contaminated soil and groundwater (Bakersfield, CA)
- On-site bioremedial cleanup of gasoline-contaminated soil (Northridge, CA)
- On-site bioremedial cleanup of gasoline-contaminated soil (San Diego, CA)
- In situ bioremedial treatment of gasoline-contaminated soil (Irvine, CA)
- On-site bioremedial cleanup of crude oil-contaminated soil (Los Angeles, CA)
- On-site bioremedial soil cleanup of phthalate esters from train derailment (Flagstaff, AZ)

PROJECT COST SUMMAP

PROJECT NAME Coke - Torrance TODAY'S DATE 9-5-89

PROJECT NO. 21795286 PH. _____ TSK. _____ PREPARED BY U. Townsend

ACTIVITY	ITEM	UNIT	QUAN	RATE	SUBTOTAL	MARKUP	TOTAL
LABOR	Sen. Proj. Mngr.	hr.	16	90	1440 00		
	Proj. Mngr.	hr	56	65	3940 00		
	Foreman	hr	48	36	1728 00		
	laborer	hr	48	28	1344 00		
	surveyor	hr.	56	90	4940 00		
EQUIP.	excavator	hr	48	145	6960 00		
	950-loader	hr.	48	95	4560 00		
MATERIAL							
ANALYTICAL	mobil Lab	dy	6	400 00	2400 00		
	sample-TPH	ea	60	75	4500 00		
TRANSPORTATION	Air Fare	TL	1	500 00	500 00		
	lodging	dy	6	50 00	300 00		
OUTSIDE EQUIP.							
DISPOSAL	Mix to asphalt	ld.	278	750 00	208,500 00		

REMARKS:

TODAY'S TOTAL 241,112

PREVIOUS TOTAL 48,222.40 20%

TOTAL TO DATE 289,334.40

300 000592

WESTERN TECHNOLOGY INC.
3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

August 29, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: SCHEDULE FOR REMEDIATION, 19875 PACIFIC GATEWAY DRIVE. JOB NO. 2179J286.

Dear Raul:

Following is a summary of the timeline for providing you with written documentation for work on the subject site.

The following items are planned for the dates stated:

August 25 - collect bulk samples from site.

August 28 to September 5 - trace and remove abandoned underground piping.

September 1 - preliminary work plan due outlining treatment options.

September 5 to September 11 - tentatively receive grading permits and cut western area to rough grade.

September 8 - conceptual work plan due including preliminary cost estimate.

September 11 to September 29 - excavation of contaminated areas and confirmatory sampling.

September 22 - final design for treatment operation.

October 2 - begin treatment operation at site. (Pending regulatory approvals.)

The above dates are the earliest occurrence for the specific items. The timeline may be slipped to accommodate construction with no adverse effects.

Coca-Cola Enterprises - West
Job No. 2179J286

We will be in contact with you to set up the pipeline tracing and removal and to review the qualifications and training of the excavation contractor.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
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Coca-Cola Enterprises - West
Job No. 2179J286

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Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

0639 - 02591

TRANSMISSION REPORT

9.20.1989 13:16

KG OSBORNE & ASSOC.

DATE	TIME	DURATION	REMOTE ID	MODE	PAGES	RESULT
9.20	13:15	0'55"	6024373140	SC	1	O.K.

301 000174

To: Pete Bea[illegible]

From: Gary Carlin

SUMMARY OF CONTAMINATION SURVEY ACTIVITIES CONDUCTED BY SMC ON THE SITE OF THE FUTURE COCA COLA WAREHOUSE FACILITY IN TORRANCE, CALIFORNIA DURING JUNE, 1989.

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-1	N.F.		10 FT.	N.F. = NOT FOUND
G-2	N.F.		10 FT	
G-3	1 FT.	2.5 FT.	10 FT.	
G-3A	6 IN.	18 IN.	2 FT.	
G-3B	6 IN.	18 IN.	2 FT.	
G-3C	6 IN.	18 IN.	2 FT.	
G-3D	6 IN.	15 IN.	2 FT.	
G-3E	18 IN.		2 FT.	VERY SLIGHT
G-3F	18 IN.		2 FT.	VERY SLIGHT
G-3G	6 IN.		10 IN.	MODERATE TO SLIGHT, TERMINATED AT PIECE OF CLAY PIPE
G-3H	6 IN.	10 IN.	1 FT.	
G-3I	N.F.		2 FT.	
G-3J	N.F.		2 FT.	
G-3K	6 IN.	18 IN.	2 FT.	
G-3L	6 IN.	18 IN.	2 FT.	SLIGHT
G-4	N.F.		10 FT.	
G-5	N.F		10 FT.	

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-6	N.F.		10 FT.	
G-7	N.F.		5 FT.	
G-8	N.F.		10 FT.	
G-9	N.F.		10 FT.	
G-10	6 IN.	18 IN.	5 FT.	VERY SLIGHT
G-11	N.F.		5 FT.	
G-12	N.F.		5 FT.	
G-13	N.F.		5 FT.	
G-14	N.F.		5 FT.	
G-15	N.F.		5 FT.	
G-16	1 FT.		1 FT.	
G-16A	1 FT.		1 FT.	
G-16B	18 IN.	2 FT.	5 FT.	VERY SLIGHT
G-17	1 FT.		1 FT.	
G-17A	1 FT.		1 FT.	
G-17B	N.F.		5 FT.	
G-18	N.F.		5 FT.	
G-19	N.F.		5 FT.	
G-20		2 FT.	5 FT.	SLIGHT
G-20A		2 FT.	5 FT.	SLIGHT
G-20B	N.F.		5 FT.	
G-21	N.F.		5 FT.	

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-22	1 FT.		1 FT.	
G-22A	1 FT.	14 FT.	15 FT.	RANGED FROM MODERATE NEAR SURFACE TO VERY SLIGHT NEAR TDB
G-23	18 IN.		7 FT.	NEAR SURFACE ODOR HAD GASOLINE-TYPE SMELL, DECREASED WITH DEPTH
G-23A	N.F.		2 FT.	CENTER OF CURRENT EXCAVATION
G-24	1 FT.	2 FT.	5 FT.	SLIGHT
G-24A	1 FT.	2 FT.	5 FT.	SLIGHT
G-24B	1 FT	5 FT.	5 FT.	SLIGHT
G-25	N.F.		5 FT.	
G-25A	18 IN.		18 IN.	MODERATE
G-26	N.F.		5 FT.	
G-26A	N.F.		5 FT.	
G-27	N.F.		5 FT.	
G-27A	N.F.		5 FT.	
G-28	0	3 FT.	5 FT.	SLIGHT
G-29	0	2 FT.	5 FT.	NOT MAPPED AS MATERIAL WAS REMOVED SAME DAY

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-30	18 IN.	3 FT.	5 FT.	NOT MAPPED
G-31	0	18 IN.	5 FT.	NOT MAPPED
G-32	0	18 IN.	5 FT.	NOT MAPPED
G-33	6 IN.		3 FT.	STRONG ODOR
G-33A	0		5 FT.	STRONG ODOR
G-33B	0		5 FT.	STRONG NEAR SURFACE, SLIGHT AT TBD
G-33C	0		5 FT.	MODERATE NEAR SURFACE, SLIGHT AT TDB
G-33D	0		5 FT.	MODERATE NEAR SURFACE, SLIGHT AT TDB
G-33E	N.F.		5 FT.	
G-33F	0	2 FT.	5 FT.	STRONG TO SLIGHT
G-33G	0	2 FT.	2 FT.	SLIGHT TO STRONG @ 18" TO SLIGHT AT TDB
G-34	1 FT.	2.5 FT.	5 FT.	
G-34A	0	18 IN.	5 FT.	
G-34B	0	1 FT.	3 FT.	
G-35	6 IN.	42 IN.	4 FT.	SLIGHT

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-35A	N.F.		5 FT.	
G-36	6 IN.	42 IN.	5 FT.	MODERATE TO SLIGHT
G-36A	0		2 FT.	MODERATE
G-36B	0	<1 FT.	1 FT.	
G-36C	0	<1 FT.	1 FT.	
G-36D	0	<1 FT.	1 FT.	
G-36E	0	<1 FT.	1 FT.	
G-36F	N.F.		1 FT.	
G-36G	0	<1 FT.	2 FT.	
G-36H	0	1 FT.	2 FT.	
G-36I	0	1 FT.	2 FT.	
G-36J	0	1 FT.	2 FT.	
G-36K	0	2 FT.	2 FT.	SLIGHT
G-36L	0	2 FT.	2 FT.	
G-36M	0	2 FT.	2 FT.	MODERATE
G-36N	N.F.		2 FT.	
G-36O	N.F		2 FT.	
G-36P	N.F.		2 FT.	
G-36Q	N.F		2 FT.	
G-36R	0	2 FT..	5 FT.	VERY SLIGHT
G-36S	18 IN.	3 FT.	4 FT.	
G-36T	0	1 FT.	4 FT.	

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-36U	0	2 FT.	3.5 FT.	SLIGHT
G-36V	0	18 IN.	3 FT.	SLIGHT
G-36W	0	2 FT.	20 FT.	SLIGHT
G-37A	0	2 FT.	5 FT.	SLIGHT
G-37B	N.F.		2 FT.	
G-37C	N.F.		3.5 FT.	
G-38A	N.F.		5 FT.	
G-38B	N.F		2 FT.	
G-38C	0	2 FT.	2 FT.	
G-38D	0	4 IN.	2 FT.	
G-38E	N.F.		3 FT.	
G-39	N.F.		4 FT,	
G-40	N.F.		5 FT.	
G-41	2 FT.		3 FT.	
G-42	N.F.		5 FT.	
G-43	N.F.		20 FT.	
G-43A	N.F.		4 FT.	
G-43B	N.F.		3 FT.	
G-44	N.F.		5 FT.	
G-45	N.F.		5 FT.	
G-46	N.F.		14 FT.	

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-47	18 IN.	2 FT.	5 FT.	ODOR POSSIBLY RELATED TO TREATED WOOD FRAGMENTS FOUND IN BORING
G-48	N.F.		5 FT.	
G-49	N.F		5 FT.	
G-50	18 IN.		5.5 FT.	MODERATE TO SLIGHT
G-50A	2 FT.		5 FT.	MODERATE TO SLIGHT
G-50B	2 FT.		5 FT.	MODERATE TO SLIGHT
G-50C	0	<1 FT.	5 FT.	
G-50D	N.F.		5 FT.	
G-50E	2 FT.		5 FT.	MODERATE TO SLIGHT
G-50F	2 FT.		5 FT.	MODERATE TO SLIGHT
G-50G	18 IN.		5 FT.	SLIGHT TO STRONG TO MODERATE AT 3 FT.
G-50H	2 FT.		5 FT.	MODERATE TO SLIGHT
G-50I	0		5 FT.	SLIGHT TO MODERATE
G-50J	2 FT.		5 FT.	MODERATE TO SLIGHT

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-50K	0	4 FT.	5 FT.	SLIGHT TO STRONG AT 3 FT.
G-50L	18 IN.		3 FT.	MODERATE
G-50M	2 FT.		5 FT.	SEWAGE-TYPE ODOR
G-50N	18 IN.		5 FT.	
G-50O	26 IN.		5 FT.	
G-50P	2 FT.		5 FT.	MODERATE TO SLIGHT
G-50Q	0	3 FT.	5 FT.	SLIGHT TO MODERATE
G-50R	4 FT.		5 FT.	MODERATE
G-50S	2 FT.		5 FT.	SLIGHT TO STRONG
G-50T	0	2 FT.	5 FT.	
G-50U	2 FT.		5 FT.	
G-50V	42 IN.		5 FT.	VERY SLIGHT
G-50W	N.F.		5 FT.	
G-50X	N.F.		5 FT.	
G-50Y	3 FT.		5 FT.	SLIGHT TO MODERATE
G-50Z	N.F.		5 FT.	
G-51	2 FT.		5 FT.	SLIGHT

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-52	0		5 FT.	SLIGHT TO MODERATE AT 3 FT., STRONG TO TDB
G-52A	18 IN.		5 FT.	MODERATE
G-52B	2 FT.	4 FT.	5 FT.	
G-52C	18 IN.	2 FT.	3 FT.	ASPHALTIC MATERIAL IN BORING
G-52C1	N.F.		4 FT.	
G-52D	3 FT.	42 IN.	5 FT.	TARRY LUMPS
G-52E	2 FT.		5 FT.	MODERATE TO SLIGHT
G-52F	3 FT.		5 FT.	SLIGHT
G-52G	2 FT.		5 FT.	VERY SLIGHT "FISH OIL" ODOR
G-52H	3 FT.		5 FT.	VERY SLIGHT "MEDICINAL" ODOR
G-52I	3 FT.		5 FT.	MODERATE TO STRONG
G-52J	1 FT.		5 FT.	SLIGHT
G-52K	18 IN.		5 FT.	SLIGHT TO STRONG AT 3 FEET TO MODERATE AT TDB
G-52L	2 FT.	3 FT.	5 FT.	VERY SLIGHT

BORING DESIGNATION	INITIAL CONTAMINATION CONTACT	LIMIT OF CONTAMINATION	TOTAL DEPTH OF BORING	COMMENTS
G-52M	2 FT.		5 FT.	VERY SLIGHT TO STRONG AT 30" TO MODERATE AT TDB
G-52N	2 FT.		5 FT.	SLIGHT TO MODERATE
G-520	2 FT.		5 FT.	SLIGHT
G-52P	N.F.		5 FT.	
G-53	2 FT.		5 FT.	VERY SLIGHT
E-1	1 FT.	4 FT.	5 FT.	
E-2	2 FT.	5 FT.	6 FT.	
E-3	2 FT.		5 FT.	
E-4	3 FT.		8 FT.	
E-5	3 FT.		3 FT.	
F-1	N.F.		4 FT.	
F-2	2 FT.	3 FT.	5 FT.	
F-3	N.F.		5 FT.	
F-4	N.F.		5 FT.	

CocaCola Plant 7/18/88

Engr. Est for Georemediation

Methane Removal

Items	Quanity	U.P.	Total	Bid
1. Strip Ex AC	2800 cy	25	70,000	95,200
2. Concrete Slurry Wall 4'x.8'x	2,000 LF 237cy	12	24,000	32,640
3. Class 2 Permeable Material		—	—	
4. Methane Venting Sys	LS	—	246,300	334,968
		total	340,300	
		6%	20,418	462,808
		30%	360,718	
			108,215	
			468,933	

Specs.

1. STRIP Existing AC

Remove existing AC Parking lot & haul old site

Estimate a section of .5' AC on native material

≃ 150,000 # Area

2. 4' Slurry wall around perimeter of site. 10" Wide

3 SACK Concrete slurry ≃ 2000 LF

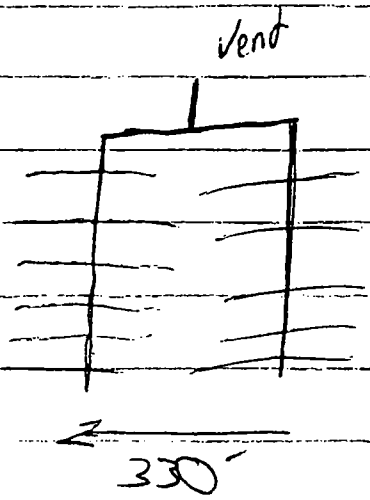
n475 Trencher 105/hr & move

301 000185

4. Methane Venting System

150,000 ft AREA 450' x 330'

SAY 2" (Sch 80 ?) slotted pipe in a trench say 1' deep
permeable material Backfill
Membrane lines covering pipe Area



Pipe Mainline	1200 LF	1200 LF
10' oc for laterals 45ea @ 330'		14,850 LF
450↑		16,050

Pacific Irrigation 837-4460 Ron
slotted pipe Perforated w/sock gravel

3" ABS SDR 35
Solid perforated
10' 58.50/100 LF
w/Bell
3" Tee 1.86 ea

Sock → .26¢/ft

not sure pipe would spec out → cost ≈ 1.00/LF

301 000186

4. methane Vent Cont.

# Collector pipe	16050 LF @	6.00	96,300
150,000 # @ membrane Liner		1.00	150,000
Geo membrane Above & Below (C.W. Neal)			246,300

301 000187

TELEPHONE BID

DATE 7/1/08

JOB Coca Cola

FIRM C.W. Neal

ADDRESS

CONTACT Chuck

TYPE WORK Install Liners

PHONE 619 449-8031

BID INCLUSIONS	TOTAL BID
150,000 # 450' x 330' Medium	
high density polyethlene 80mil	
special app to install	
No Guarantee that it will remain in	
one peice →	
Use Geo Cloth as well Top & Bottom	

301 000188

FEDERAL EXPRESS

AIRBILL

USE THIS AIRBILL FOR DOMESTIC SHIPMENTS WITHIN THE CONTINENTAL U.S.A., ALASKA AND HAWAII. USE THE INTERNATIONAL AIR WAYBILL FOR SHIPMENTS TO PUERTO RICO. QUESTIONS? CALL 800-238-5355 FREE.

PACKAGE TRACKING NUMBER 3779554074

3779554074

Date 6-12-89

RECIPIENT'S COPY

1 From (Your Name) Please Print

Your Phone Number (Very Important) (213)-651-0933

Company: CADIZ & CADIZ ARCHITECTS

Department/Floor No.

Street Address: 5861 HOLLYWOOD BLVD STE 200

City: LOS ANGELES State: CA ZIP Required: 9 0 0 2 8

2 To (Recipient's Name) Please Print: GARY CARLIN

Recipient's Phone Number (Very Important): (714) 380-059

Company: STOVEY - MILLER CONSULTANTS

Department/Floor No.

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.): 14 HUGHES, SUITE B-101

City: IRVINE State: CA ZIP Required: 92718

3 YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE.): COCA-COLA CARSON

PAYMENT ☒ Bill Sender ☐ Bill Recipient's FedEx Acct. No. ☐ Bill 3rd Party FedEx Acct. No. ☐ Bill Credit Card ☐ Cash

4 SERVICES

1 ☐ PRIORITY 1 Overnight Delivery
2 ☐ COURIER-PAK OVERNIGHT ENVELOPE*
3 ☐ OVERNIGHT BOX
4 ☒ OVERNIGHT TUBE
5 ☐ STANDARD AIR Delivery not later than second business day
6 ☒ OVERNIGHT LETTER*
7 ☐
8 ☐
9 ☐
10 ☐

*Declared Value Limit $100.

DELIVERY AND SPECIAL HANDLING

1 ☐ HOLD FOR PICK-UP (Fill in Box H)
2 ☐ DELIVER WEEKDAY
3 DELIVER SATURDAY (Extra charge) ☐
4 ☒ DANGEROUS GOODS (Extra charge)
5 ☐ CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Release Signature Not Applicable)
6 ☐ DRY ICE _____ Lbs.
7 ☐ OTHER SPECIAL SERVICE _____
8 ☐
9 ☐ SATURDAY PICK-UP (Extra charge)
10 ☐
11 ☐
12 ☐ HOLIDAY DELIVERY (If offered) (Extra charge)

PACKAGES	WEIGHT IN POUNDS ONLY	TOTAL DECLARED VALUE	OVER SIZE
Total	Total	Total	

Received At: 1 ☐ Regular Stop 2 ☐ On-Call Stop 3 ☐ Drop Box 4 ☐ B.S.C. 5 ☐ Station

FEDEX Corp. Employee No.

Date/Time for FEDEX Use

H IF HOLD FOR PICK-UP, Print FEDEX Address Here

Street Address

City State ZIP Required

Emp. No. Date

☐ Cash Received
☐ Return Shipment
☐ Third Party ☐ Chg. To Del. ☐ Chg. To Hold

Street Address

City State Zip

Received By: X

Date/Time Received FedEx Employee Number

5 Sender authorizes Federal Express to deliver this shipment without obtaining a delivery signature and shall indemnify and hold harmless Federal Express from any claims resulting therefrom.

Release Signature:

Federal Express Use

Base Charges

Declared Value Charge

Other 1

Other 2

Total Charges

PART #111800 REVISION DATE 10/88 PRINTED IN U.S.A. FX3EM

009

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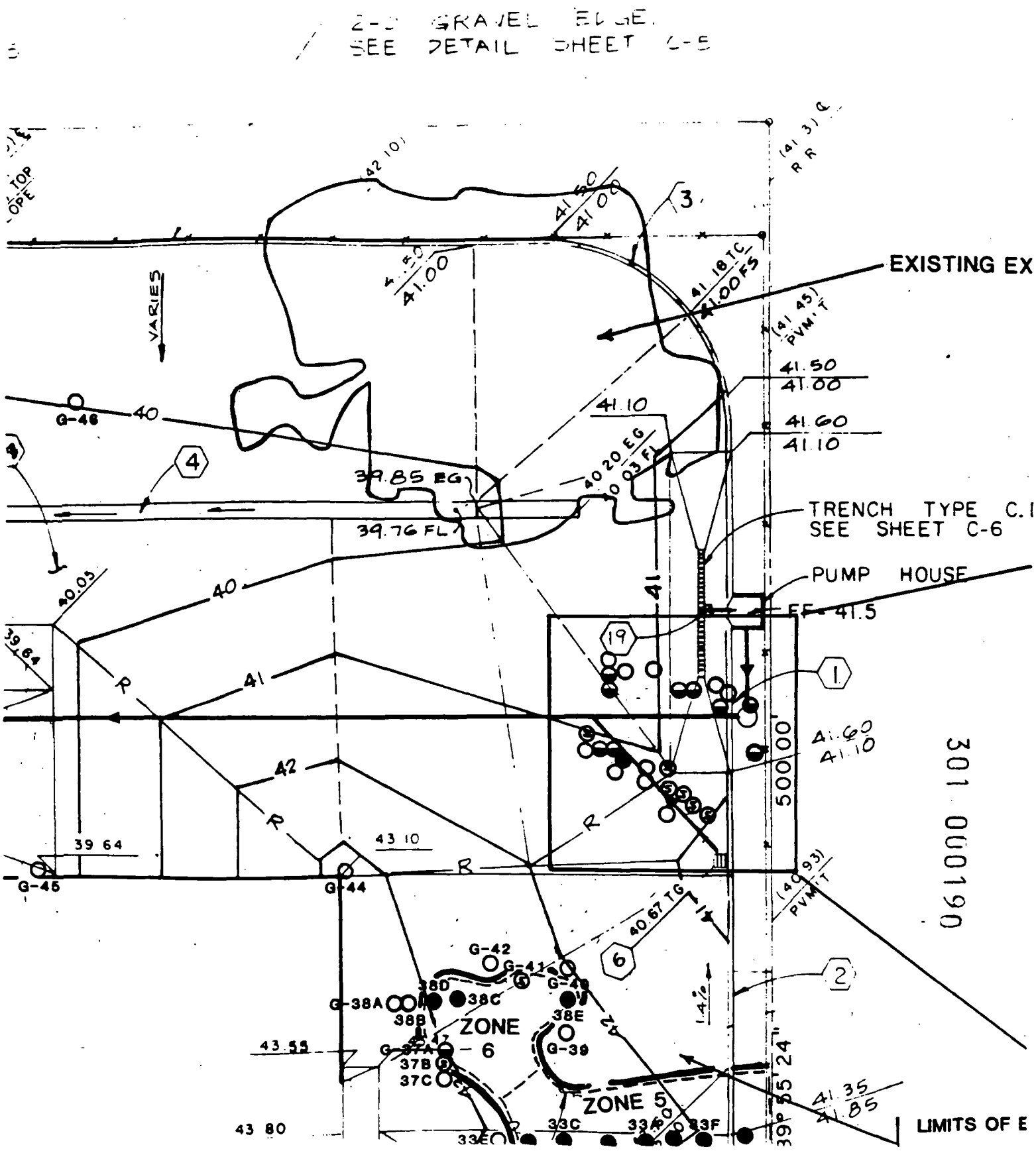
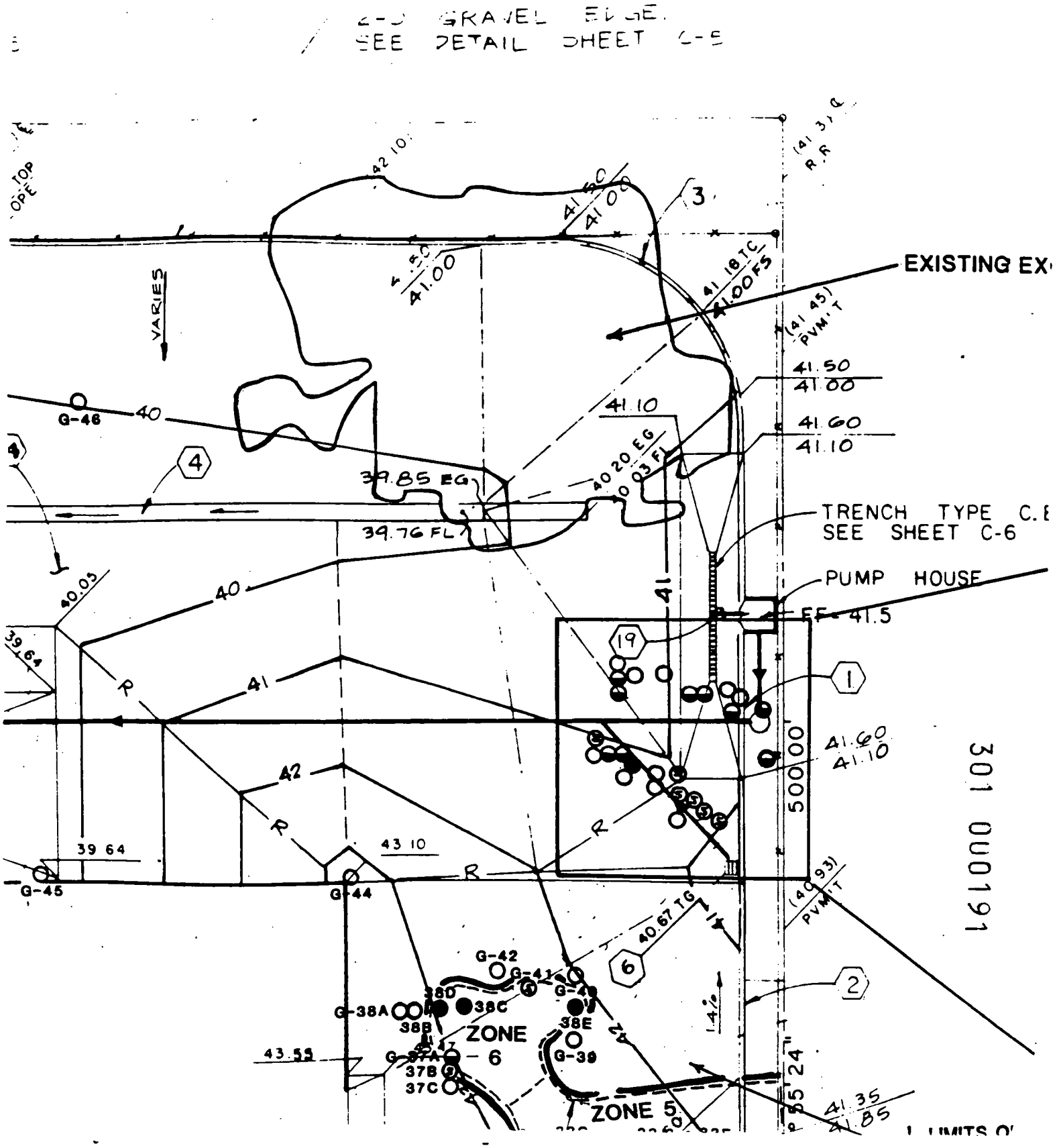
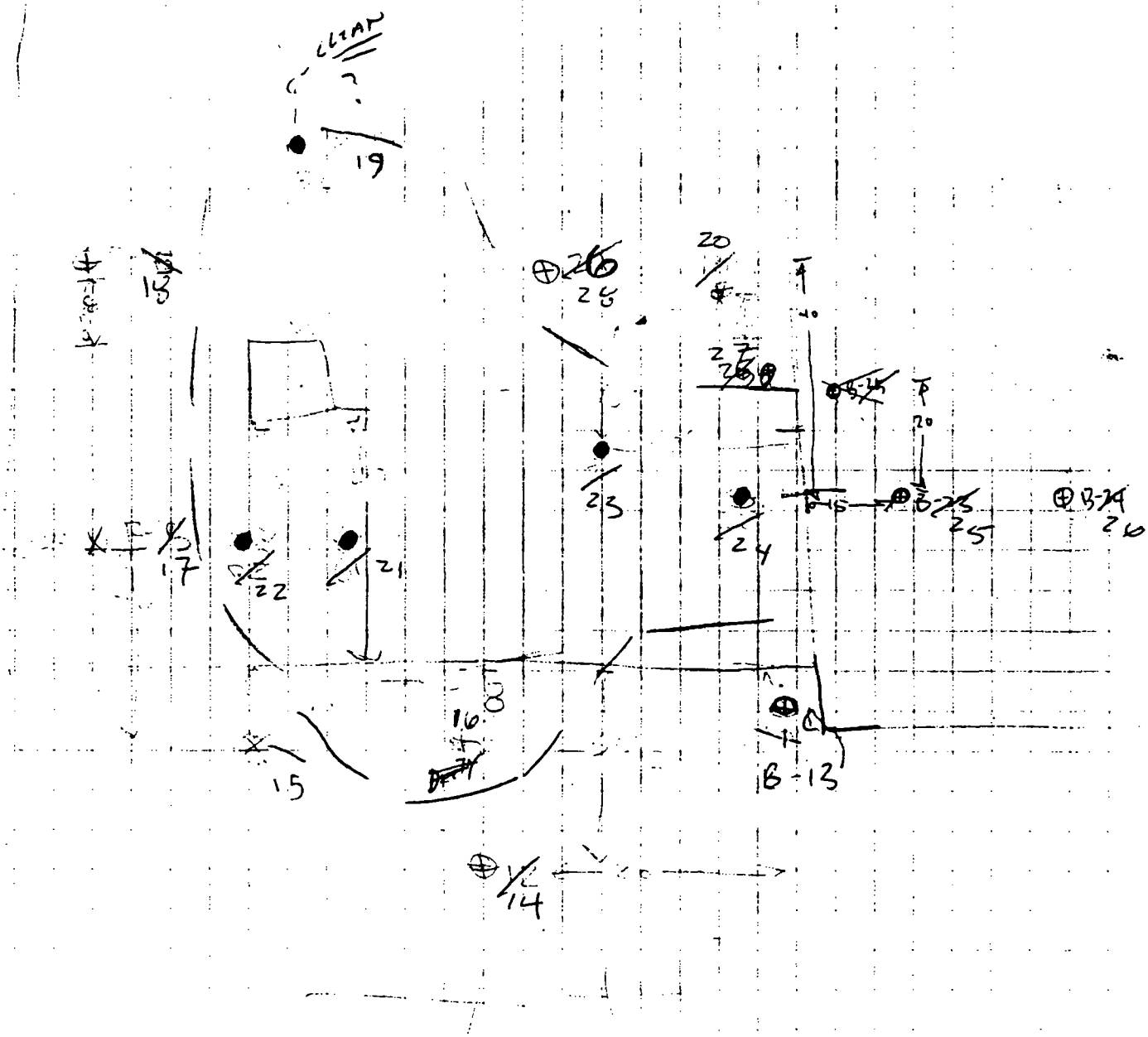
301 000189


GRAVEL EDGE
SEE DETAIL SHEET C-5
EXISTING EX
TRENCH TYPE C.I
SEE SHEET C-6
PUMP HOUSE
FF - 41.5
VARIES
ZONE 6
ZONE 5
LIMITS OF E
301 000190



GRAVEL EDGE
SEE DETAIL SHEET C-5
EXISTING EX
VARIES
TRENCH TYPE C.
SEE SHEET C-6
PUMP HOUSE
EF=41.5
ZONE 6
ZONE 5
G-46
G-45
G-44
G-42
G-41
G-38A
38B
38C
38D
38E
G-39
37B
37C
39.85 EG
39.76 FL
40.20 EG
40.03 FL
41.18 TC
41.00 FS
41.50
41.00
41.60
41.10
41.35
41.85
40.67 TG
43.10
43.55
39.64
40.05
500.00'
301 000191

PACIFIC



100' X

1" = ?

301 000192

COCA-COLA ENTERPRISES

1334 South Central Avenue
Los Angeles, CA 90021
(213) 746-5555

FACSIMILE COVER SHEET

FACSIMILE MACHINE: (213) 744-8904

DATE: 10/6/89 TIME: 10:20 AM

PLEASE DELIVER THE FOLLOWING: 26 PAGE(S) TO:

NAME: Gary Carlin

FACSIMILE NUMBER: (714) 474-1884

FROM: Raul Ramirez

COMMENTS:

IF YOU DO NOT RECEIVE ALL PAGES, PLEASE CALL:

(213) 746-5555 EXT. 4335

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 975
27 OCT 1988

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 S.BAY WAREHSE			
G 10 OCT 1988	2.00	PRINCIPAL ENG\GEO REPORT PREPARATION	180.00
G 11 OCT 1988	2.00	PRINCIPAL ENG\GEO REPORT PREPARATION	180.00
G 10 OCT 1988	1.00	WORD PROCESSING	30.00
G 11 OCT 1988	1.00	COURIER SERVICE	50.00

Current Charges	440.00
Previous Balance	2051.50
Balance due	2491.50

THANK YOU

301 000194

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 921
18 OCT 1988

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

	DATE	QTY	SERVICE P.O. 004270	CHARGES
	PROJ.10221-00 S.BAY WAREHSE			
GFT	28 SEP 1988	2.00	PROJECT ENG/GEO PREPARE P.A. & BUDGET REVIEW & EQUIPMENT	130.00
GFT	29 SEP 1988	1.00	PROJECT ENG/GEO PREPARE P.A. & BUDGET REVIEW & EQUIPMENT	65.00
G	30 SEP 1988	8.00	PROJECT ENG/GEO GEOTECHNICAL INVESTIGATION	520.00
G	30 SEP 1988	1.00	PROJECT ENG/GEO OVERTIME/GEOTECHNICAL INVESTIGATION	97.50
	1ST TOXIC PROBLEM			
G	30 SEP 1988	8.50	FIELD SAMPLING EQUIPMENT	1224.00
G	7 OCT 1988	0.50	WORD PROCESSING	15.00

Current Charges 2051.50

Balance due 2051.50

THANK YOU

DUPLICATE

301 000195

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

STONEY-MILLER CONSULTANTS, INC.
14 HUGHES STREET, SUITE B-101
IRVINE, CALIFORNIA 92714

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

Invoice # 1038
18 NOV 1988

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
27 OCT 1988	2.00	expansion index	150.00
27 OCT 1988	1.00	atterberg limits	80.00
28 OCT 1988	1.00	atterberg limits	80.00
31 OCT 1988	3.00	SENIOR ENGINEER/GEOLOGIST SITE VISIT/OBSERVATION AND TESTING 9/30/88	225.00
31 OCT 1988	2.00	Senior Eng/Geologist PROJECT REVIEW AND LAB COORD 10/5/88	150.00
6 OCT 1988	4.00	Senior Eng/Geologist TORRANCE RESEARCH, CLIENT DISCUSSION AND SITE VISIT 10/06/88	300.00
31 OCT 1988	4.00	Senior Eng/Geologist TORRANCE LETTER PREP & CLIENT DISCUSSION 10/7/88	300.00
31 OCT 1988	1.00	Senior Eng/Geologist TORRANCE-LABORATORY PREP 10/07/88	75.00
31 OCT 1988	8.00	Senior Eng/Geologist DRILLING AND SAMPLING 10/11/88	600.00
31 OCT 1988	8.00	Field Technician I DRILLING AND SAMPLING 10/11/88	320.00
31 OCT 1988	1.00	FIELD SAMPLING EQUIPMENT CONCRETE CORING MACHINE 10/1, 11/2, 11/9	640.00
31 OCT 1988	2.00	FIELD SAMPLING EQUIPMENT GASTECH/9/30 & 10/11	120.00
31 OCT 1988	2.00	Senior Eng/Geologist AGENCY DISCUSSION/DRILLING AND SCHEDULING	150.00
1 NOV 1988	1.00	Senior Eng/Geologist	75.00

DUPLICATE

			AGENCY DISCUSSION	
T	2 NOV 1988	3.00	Senior Eng/Geologist DRILLING AT SITE	225.00
T	3 NOV 1988	1.00	Senior Eng/Geologist DATA EVALUATION	75.00
T	2 NOV 1988	7.00	Field Technician I OBSERVATION AND TESTING	280.00
T	1 NOV 1988	1.00	Project Eng/Geologist DRILLING PREPARATION	65.00
T	2 NOV 1988	10.00	Project Eng/Geologist DRILLING AT SITE	650.00
T	9 NOV 1988	4.00	Project Eng/Geologist DRILLING AT SITE	260.00
T	2 NOV 1988	10.00	Field Technician I DRILLING AT SITE	400.00
T	2 NOV 1988	10.00	Field Technician I DRILLING/OBSERVATION AND TESTING	400.00
T	9 NOV 1988	6.00	Field Technician I DRILLING AT SITE	240.00
T	9 NOV 1988	6.00	Field Technician I OBSERVATION AND TESTING DRILLING	240.00
T	2 NOV 1988	1.00	RINGS	272.80
T	9 NOV 1988	1.00	GENERATOR	60.00
T	9 NOV 1988	3.00	HAND AUGER 3 DAYS WITH HAND AUGER 10/11, 11/02 & 11/09	360.00
T	31 OCT 1988	1.00	LABORATORY TESTING ONE EPA 418.1 ONE EPA 8080 ONE EPA 8270 10/18/88	750.00
T	31 OCT 1988	1.00	LABORATORY TESTING 9 EPA 418.1 9 EPA 8270 10/25/88	4914.00

Current Charges	12450.80
Previous Balance	2491.50
Balance due	14942.30

THANK YOU

DUPLICATE

301 000197

STONEY-MILLER CONSULTANTS, INC

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1108
5 DEC 1988

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES	
PROJ.10221-00 PO 104270 SB WHS				
16 NOV 1988	1.50	SENIOR ENG\GEO REPORT REVIEW	112.50	-EC
17 NOV 1988	2.00	STAFF ENG/GEOLOGIST GEOTECHNICAL MAP PREPARATION/ CALCS	110.00	-EC
17 NOV 1988	2.00	FIELD VEHICLE	8.00	-EC

Current Charges	230.50
Previous Balance	14948.30
Balance Due	15176.80

THANK YOU

DUPLICATE

301 000198

14 HUGHES SUITE B-101 IRVINE, CA 92718 (714) 380-4866

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

Invoice # 1254
11 JAN 1989

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
16 DEC 1988	1.00	Field Technician III PROCESSING FOR LAB WORK	48.00
16 DEC 1988	8.00	moisture density (ring)	112.00
21 DEC 1988	0.50	PROJECT ENG/GEO REVIEW LAB WORK	32.50
21 DEC 1988	1.00	expansion index	75.00
21 DEC 1988	1.00	atterberg limits	80.00
30 DEC 1988	1.00	Project Eng/Geologist LAB COORDINATION AND CLIENT DISCUSSION	65.00
30 DEC 1988	2.00	Project Eng/Geologist LAAB COORDINATION AND CLIENT DISCUSSION 10/18/88	130.00
30 DEC 1988	2.00	Project Eng/Geologist CLIENT DISSCUSSION AND DATA EVALUATION/RESEARCH	130.00
30 DEC 1988	5.00	Project Eng/Geologist CLIENT DISCUSSION AND DATA EVALUATION/RESEARCH 10/21/88	325.00
30 DEC 1988	0.50	Staff Eng/Geologist LABORATORY COORDINATION OF ANALYSIS RESULTS 12/21/88	27.50
30 DEC 1988	5.00	Staff Eng/Geologist TELEPHONE CONVERSATIONS AND AGENCY DISCUSSIONS TO OBTAIN PERTINENT SUPERFUND REPORTS 10/24-25/88	275.00
30 DEC 1988	2.00	Project Eng/Geologist CLIENT DISCUSSION AND RESEARCH 10/25/88	130.00
30 DEC 1988	6.00	Project Eng/Geologist RECORDS RESEARCH, CLIENT DISCUSSION AND SUMMARY PREPARATION 10/26/88	390.00

DUPLICATE

301 000199

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

7	30 DEC 1988	4.00	Project Eng/Geologist CLIENT AND AGENCY DISCUSSIONS 10/31/88	260.00
7	30 DEC 1988	4.00	Project Eng/Geologist DRILLING AND SAMPLING 11/2/88	260.00
7	30 DEC 1988	5.00	Project Eng/Geologist DRILLING AND SAMPLING 11/9/88	325.00 "
7	30 DEC 1988	1.00	CONCRETE CORING MACHINE 11/9/8	180.00 "
7	30 DEC 1988	1.00	GENERATOR 11/9/88	60.00 "
7	30 DEC 1988	1.00	HAND AUGER 11/9/88	120.00 "
7	30 DEC 1988	7.00	Project Eng/Geologist AT SITE AREA AND MEETING AT COKE 11/10/88	455.00 "
7	30 DEC 1988	2.00	Project Eng/Geologist CLIENT DISCUSSION AND REPORT 11/14/88	130.00 "
7	30 DEC 1988	2.00	Project Eng/Geologist REPORT PREPARATION 11/15/88	130.00 "
7	30 DEC 1988	8.00	Project Eng/Geologist REPORT PREPARATION	520.00 "
7	30 DEC 1988	2.00	Project Eng/Geologist CLIENT DISCUSSION AND REPORT FINAL 11/18/88	130.00 "
7	30 DEC 1988	4.00	Project Eng/Geologist REPORT PREPARATION AND DELIVERY	260.00 "
7	30 DEC 1988	8.00	Project Eng/Geologist REPORT PREPARATION 11/17/88	520.00 "
7	30 DEC 1988	1.00	Staff Eng/Geologist DATA REVIEW 11/14/88	55.00 "
7	30 DEC 1988	3.00	Staff Eng/Geologist DATA REVIEW AND MAP PREPARATION 11/17/88	165.00 "
7	30 DEC 1988	5.00	Staff Eng/Geologist REVIEW OF DOHS REPORTS 11/18/88	330.00 "
7	30 DEC 1988	0.50	Project Eng/Geologist CLIENT DISCUSSION 11/30/88	32.50 "
7	30 DEC 1988	9.50	FIELD TECHNICIAN I HAND DRILLING AND SAMPLING 11/30/88	228.00 "
6	29 DEC 1988	1.00	maximum density (standard)	100.00
6	29 DEC 1988	1.00	sieve analysis +4 or-4	65.00

DUPLICATE

301 000200

29 DEC 1988	1.00 #200 wash sieve	30.00

Current Charges	6175.50
Balance due	6175.50

THANK YOU

DUPLICATE

301 000201

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1514
9 MAR 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
30 JAN 1989	1.00	DIRECT SHEAR	144.00
30 JAN 1989	1.00	MOISTURE DENSITY	20.00
16 FEB 1989	30.00	FAX	36.00
3 MAR 1989	31.00	FAX/NEIL ALLEN/ANCON ENVIRONMT	37.20

Current Charges	237.20
Balance due	237.20

THANK YOU

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1574
3 APR 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
1 MAR 1989	1.00	Project Eng/Geologist DISCUSSION WITH AGENCY, CLIENT AND CONTRACTOR	65.00
2 MAR 1989	3.00	Project Eng/Geologist DISCUSSION WITH AGENCY, CLIENT AND CONTRACTOR	195.00
3 MAR 1989	2.00	Project Eng/Geologist DISCUSSION WITH AGENCY, CLIENT AND CONTRACTOR	130.00
15 MAR 1989	1.00	Project Eng/Geologist CLIENT DISCUSSION AND POTENTIAL CONTRACT EVALUATION	65.00
17 MAR 1989	0.50	Project Eng/Geologist CLIENT DISCUSSION AND POTENTIAL CONTRACT EVALUATION	32.50
22 MAR 1989	4.00	Project Eng/Geologist PRE-CONSTRUCTION MEETING	260.00

Current Charges	747.50
Previous Balance	237.20
Balance due	984.70

THANK YOU

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1639
19 APR 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
31 MAR 1989	1.00	1PH, SULFIDE, CYANIDE, FLASHPOINT, TOX	254.00
31 MAR 1989	1.00	1EPA 8015	132.00
31 MAR 1989	1.00	1 TTLC 17 CAM METALS	360.00
31 MAR 1989	1.00	1EPA 8080 PCB'S	180.00
6 APR 1989	1.00	1 EPA 8010/RUSH	230.40

HAZ-QUALIFICATION of soil

Current Charges	1156.40
Previous Balance	984.70
Balance due	2141.10

THANK YOU

DUPLICATE

STONEY-MILLER CONSULTANTS, INC

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1726
2 MAY 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

	DATE	QTY	SERVICE	CHARGES
	PROJ.10221-00 PO 104270 SB WHS			
G	12 APR 1989	6.00	SENIOR ENG\GEO REPORT PREPARATION	450.00
G	13 APR 1989	1.50	WORD PROCESSING	45.00
G	12 APR 1989	1.00	REPRODUCTIONS	1.90
T	24 MAR 1989	3.00	ENVIRONMENTAL CHEMIST SAMPLING FOR PRE-REMOVAL TESTING	165.00
T	3 APR 1989	1.50	SENIOR ENG/GEO LAB COORDINATION, CLIENT AND CONTRACTOR DISCUSSIONS	112.50
T	4 APR 1989	1.00	SENIOR ENG/GEO LAB COORDINATION, CLIENT AND CONTRACTOR DISCUSSIONS	75.00
T	5 APR 1989	1.00	SENIOR ENG/GEO LAB COORDINATION, CLIENT AND CONTRACTOR DISCUSSIONS	75.00
T	27 MAR 1989	4.00	SENIOR ENG/GEO MEETING WITH LOS ANGELES FIRE DEPARTMENT TO OBTAIN PERMIT	300.00
T	27 MAR 1989	0.50	SENIOR ENG/GEO LAB COORDINATION, CLIENT AND CONTRACTOR DISCUSSIONS	37.50
T	31 MAR 1989	1.00	SENIOR ENG/GEO LAB COORDINATION, CLIENT AND CONTRACTOR DISCUSSIONS	75.00
T	31 MAR 1989	2.00	SENIOR ENG/GEO LAB COORDINATION, DISSCUSSIONS WITH CLIENT AND CONTRACTOR	150.00
T	31 MAR 1989	2.00	ENVIRONMENTAL CHEMIST LAB CALLS, INFORMATION TRANSFER AND CONTRACTOR DISCUSSIONS	110.00
T	1 APR 1989	2.50	Senior Eng/Geologist	187.50

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

Begin Actual Cleanup

			LAB COORDINATION, CLIENT DISCUSSION AND DISCUSSION WITH CONTRACTOR	
T	10 APR 1989	7.50	Field Technician II MONITOR SOIL REMOVAL AND TECHNICAL DIRECTION	330.00
T	10 APR 1989	7.50	Field Vehicle	30.00
T	11 APR 1989	8.00	Field Technician II MONITOR SOIL REMOVAL AND TECHNICAL DIRECTION	352.00
T	11 APR 1989	8.00	Field Vehicle	32.00
T	12 APR 1989	8.00	Field Technician II MONITOR SOIL REMOVAL AND TECHNICAL DIRECTION	352.00
T	12 APR 1989	8.00	Field Vehicle	32.00
T	13 APR 1989	8.00	Field Technician II MONITOR SOIL REMOVAL AND TECHNICAL DIRECTION	352.00
T	13 APR 1989	8.00	Field Vehicle	32.00
T	14 APR 1989	7.00	Field Technician II MONITOR SOIL REMOVAL AND TECHNICAL DIRECTION	308.00
T	14 APR 1989	7.00	Field Vehicle	28.00
T	10 APR 1989	4.00	ENVIROMENTAL CHEMIST MONITOR SOIL REMOVAL AND TECHNICAL DIRECTION	220.00
T	10 APR 1989	5.50	Senior Eng/Geologist TECHNICAL DIRECTION, LABORATORY COORDINATION AND CLIENT DISCUSSIONS	412.50
T	11 APR 1989	5.50	Senior Eng/Geologist TECHNICAL DIRECTION, LABORATORY COORDINATION AND CLIENT DISCUSSIONS	412.50
T	12 APR 1989	4.00	Senior Eng/Geologist TECHNICAL DIRECTION, LABORATORY COORDINATION AND CLIENT DISCUSSIONS	300.00
T	13 APR 1989	5.00	Senior Eng/Geologist TECHNICAL DIRECTION, LABORATORY COORDINATION AND CLIENT DISCUSSIONS	375.00
T	14 APR 1989	13.00	Senior Eng/Geologist	975.00

DUPLICATE

301 000206

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1870
14 JUN 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
G 26 MAY 1989	1.00	SECRETARIAL SERVICES ONE EXTRA REPORT COPY #9-0624	25.00
G 26 MAY 1989	1.00	REPRODUCTIONS/EXTRA REPORT	23.90
G 26 MAY 1989	1.00	FEDERAL EXPRESS/EXTRA REPORT	24.00
G 17 MAY 1989	1.00	FEDERAL EXPRESS/ATTEN C.CANDIZ	24.00
G 26 MAY 1989	1.00	FEDERAL EXPRESS/RAUL RAMIREZ	20.70
T 22 MAY 1989	1.50	Senior Eng/Geologist TECHNICAL DIRECTION AND CLIENT AND CONTRACTOR DISCUSSIONS	112.50
T 22 MAY 1989	7.50	Field Technician II DIRECTION OF CLEAN-UP AND SOIL REMOVAL	330.00
T 22 MAY 1989	7.50	Field Vehicle	30.00
T 23 MAY 1989	4.00	Field Technician II DIRECTION OF CLEAN-UP AND SOIL REMOVAL	176.00
T 23 MAY 1989	4.00	Field Vehicle	16.00
T 24 MAY 1989	5.50	Senior Eng/Geologist SITE EXCAVATION AND MEETING WITH CLIENT TO EVALUATE BUILDING	412.50
T 24 MAY 1989	7.50	Field Technician II DIRECTION OF CLEAN-UP AND SOIL REMOVAL	330.00
T 24 MAY 1989	7.50	Field Vehicle	30.00
T 25 MAY 1989	.50	Senior Eng/Geologist TECHNICAL DIRECTION AND CLIENT AND CONTRACTOR DISCUSSIONS	37.50
T 25 MAY 1989	8.50	Field Technician II DIRECTION OF CLEAN-UP AND SOIL REMOVAL	374.00

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4686

25 MAY 1989	8.50	Field Vehicle	34.00
26 MAY 1989	5.50	Field Technician II DIRECTION OF CLEAN-UP AND SOIL REMOVAL	242.00
26 MAY 1989	5.50	Field Vehicle	22.00

Current Charges	2264.10
Previous Balance	14804.10
Balance due	17068.20

THANK YOU

DUPLICATE

301 000208

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1937
27 JUN 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
30 MAY 1989	1.50	Senior Eng/Geologist TECHNICAL DIRECTION OF SOIL REMOVAL AND DRILLING	112.50
30 MAY 1989	9.00	ENVIRONMENTAL CHEMIST VISUAL INSPECTION OF BORING AROUND EXCAVATION	495.00
30 MAY 1989	8.50	LABOR DRILLING AND SAMPLING AROUND EXCAVATION	170.00
31 MAY 1989	1.00	Senior Eng/Geologist TECHNICAL DIRECTION OF REMOVAL OF SOIL AND DRILLING DIRECTION AROUND EXCAVATION	75.00
1 JUN 1989	5.50	Senior Eng/Geologist CLIENT DISSCUSSION AND MEETING AT COCA-COLA L.A. OFFICE	412.50
5 JUN 1989	2.00	Senior Eng/Geologist TECHNICAL DIRECTION OF SOIL REMOVAL AND SUBSURFACE INVESTIGATION	150.00
5 JUN 1989	9.50	ENVIRONMENTAL CHEMIST EXPLORITORY DRILLING AROUND PROPOSED OUTFALL LINE	522.50
6 JUN 1989	2.00	Senior Eng/Geologist TECHNICAL DIRECTION OF SOIL REMOVAL AND SUBSURFACE INVESTIGATION	150.00
7 JUN 1989	4.00	Senior Eng/Geologist TECHNICAL DIRECTION AND TRIP TO SITE TO EVALUATE NEWLY FOUND CONTAMINATION AND EVAULATE BORING RESULTS	300.00
8 JUN 1989	1.50	Senior Eng/Geologist	112.50

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

			TECHNICAL DIRECTION OF SOIL REMOVAL AND SUBSURFACE INVESTIGATION	
T	10 JUN 1989	5.00	Senior Eng/Geologist SITE VISIT AND TECHNICAL DIRECTION REGARDING NEW FOUND CONTAMINATION	375.00
T	7 JUN 1989	2.00	ENVIRONMENTAL CHEMIST SET-UP EXPLORITORY DRILLING	110.00
T	8 JUN 1989	3.50	ENVIRONMENTAL CHEMIST TECHNICAL DIRECTION OF EXPLORITORY BORINGS	192.50
T	10 JUN 1989	8.00	ENVIRONMENTAL CHEMIST EXPLORITORY BORINGS AROUND NEWLY DISCOVERED SUBSURFACE CONTAMINATION	440.00
	Begin Exp Phase of Hauling Soil			
T	5 JUN 1989	7.50	Field Technician II MONITOR CONTAMINATED SOIL REMOVAL	330.00
T	5 JUN 1989	7.50	Field Vehicle	30.00
T	6 JUN 1989	8.00	Field Technician II MONITOR CONTAMINATED SOIL REMOVAL	352.00
T	6 JUN 1989	8.00	Field Vehicle	32.00
T	7 JUN 1989	9.00	Field Technician II MONITOR CONTAMINATED SOIL REMOVAL	396.00
T	7 JUN 1989	9.00	Field Vehicle	36.00
T	8 JUN 1989	2.50	Field Technician II INVESTIGATION OF EXTENT OF SOIL CONTAMINATION	110.00
T	8 JUN 1989	2.50	Field Vehicle	10.00
T	8 JUN 1989	5.00	Field Technician II MONITOR CONTAMINATED SOIL REMOVAL	220.00
T	8 JUN 1989	5.00	Field Vehicle	20.00
T	9 JUN 1989	8.00	Field Technician II MONITOR CONTAMINATED SOIL REMOVAL	352.00
T	9 JUN 1989	8.00	Field Vehicle	32.00
T	7 JUN 1989	8.50	Staff Eng/Geologist DRILLING AND SAMPLING THROUGHOUT THE SITE AND	467.50

DUPLICATE

			AROUND NEWLY DISCOVERED CONTAMINATION	
7	8 JUN 1989	8.50	Staff Eng/Geologist DRILLING AND SAMPLLING THROUGHOUT THE SITE AND AROUND NEWLY DISCOVERED CONTAMINATION	467.50
7	9 JUN 1989	8.50	Staff Eng/Geologist DRILLING AND SAMPLING THROUGHOUT THE SITE AND AROUND NEWLY DISCOVERED CONTAMINATION	467.50
7	5 JUN 1989	11.50	LABOR	230.00
7	7 JUN 1989	18.00	LABOR	360.00
7	8 JUN 1989	18.00	LABOR	360.00
7	9 JUN 1989	18.00	LABOR	360.00
7	10 JUN 1989	14.00	LABOR	280.00
7	10 JUN 1989	3.00	GAS TECH RENTAL 3 DAYS/6/7, 6/8, & 6/10	180.00
7	16 JUN 1989	1.00	EPA 418.1 FOR TPH	69.40
7	16 JUN 1989	1.00	EPA 8240	300.00

Current Charges	9078.40
Previous Balance	16831.00
Balance due	25909.40

THANK YOU

DUPLICATE

301 000211

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 2001
12 JUL 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104370 SB WHS			
G 26 JUN 1989	0.50	SECRETARIAL SERVICES 1 EXTRA REPORT #9-0624 CLEGG ENGINEERING	12.50
G 26 JUN 1989	1.00	REPRODUCTION/EXTRA REPORTS	6.30
T 26 JUN 1989	1.00	PRINCIPAL ENG\GEO PROJECT REVIEW	90.00
T 13 JUN 1989	1.00	GASTECH ONE DAY RENTAL	60.00
T 14 JUN 1989	1.00	GASTECH ONE DAY RENTAL	60.00
T 12 JUN 1989	5.00	Senior Eng/Geologist MEETING WITH CLIENT AT SITE AND REVIEW OF WEEKEND DRILLING	375.00
T 12 JUN 1989	0.50	Senior Eng/Geologist DRILLING TECHNICAL DIRECTION AND DATA EVALUATION	37.50
T 13 JUN 1989	2.00	Senior Eng/Geologist DRILLING TECHNICAL DIRECTION AND DATA EVALUATION	150.00
T 14 JUN 1989	1.50	Senior Eng/Geologist DRILLING TECHNICAL DIRECTION AND DATA EVALUATION	112.50
T 15 JUN 1989	2.00	Senior Eng/Geologist DRILLING TECHNICAL DIRECTION AND DATA EVALUATION	150.00
T 16 JUN 1989	1.00	Senior Eng/Geologist DRILLING TECHNICAL DIRECTION AND DATA EVALUATION	75.00
T 12 JUN 1989	2.00	ENVIRONMENTAL CHEMIST DATA MAPPING	165.00
T 13 JUN 1989	1.00	ENVIRONMENTAL CHEMIST DATA MAPPING	55.00
T 12 JUN 1989	8.50	Staff Eng/Geologist DRILLING TEST HOLES	467.50

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 350-4886

7	13 JUN 1989	9.00	Staff Eng/Geologist DRILLING TEST HOLES	495.00
7	14 JUN 1989	8.50	Staff Eng/Geologist DRILLING TEST HOLES	467.50
7	15 JUN 1989	8.00	Staff Eng/Geologist PLOTTING HOLE SITE/ CONSTRUCTING CROSS SECTIONS AND ORGANIZING FIELD NOTES	440.00
7	16 JUN 1989	2.50	Staff Eng/Geologist PLOTTING HOLE SITE, CONSTRUCTING CROSS SECTIONS AND ORGANIZING FIELD NOTES	137.50
7	12 JUN 1989	15.00	LABOR/2 PERSONS DRILLING	300.00
7	13 JUN 1989	16.00	LABOR/2 PERSONS DRILLING	320.00
7	14 JUN 1989	15.00	LABOR/2 PERSONS DRILLING	300.00
7	19 JUN 1989	4.00	Senior Eng/Geologist DATA EVALUATION AND MEETING WITH CLIENT AND MANAGEMENT REPRESENTATIVES AT SITE	300.00
7	22 JUN 1989	1.50	Senior Eng/Geologist DATA EVALUATION	112.50
7	23 JUN 1989	1.00	Senior Eng/Geologist AGENCY DISCUSSION TO BEGIN TO FINALIZE CLEANUP, DOCUMENTATION AND CLENT DISCUSSION	75.00
7	21 JUN 1989	13.00	LABOR/2 PERSONS DRILLING	260.00
7	19 JUN 1989	5.00	Field Technician II BORING AND SAMPLING	200.00
7	19 JUN 1989	5.00	Field Vehicle	20.00
7	21 JUN 1989	8.00	Field Technician II BORING AND SAMPLING	352.00
7	21 JUN 1989	8.00	Field Vehicle	32.00
7	22 JUN 1989	5.00	Staff Eng/Geologist DATA REDUCTION AND MAP COMPLIATION	375.00
7	23 JUN 1989	5.50	Staff Eng/Geologist DATA REDUCTION AND MAP COMPILATION	412.50

DUPLICATE

27 JUN 1989	4.00 EDA 8270 + 50% RUSH	9240.00
27 JUN 1989	4.00 TPH(418.1) + 50% RUSH	412.80

Current Charges	9578.10
Previous Balance	25909.40
Balance due	35787.50

THANK YOU

DUPLICATE

301 000214

			TECHNICAL DIRECTION, LABORATORY COORDINATION AND CLIENT DISCUSSIONS	
T	19 APR 1989	0.50	ENVIRONMENTAL CHEMIST RECORDS RESEARCH	27.50
T	17 APR 1989	4.50	Senior Eng/Geologist TECHNICAL DIRECTION, CLIENT AND CONTRACTORS DISCUSSIONS	337.50
T	20 APR 1989	0.50	Senior Eng/Geologist CONDITION EVALUATION AND CLIENT DISCUSSIONS	37.50
T	21 APR 1989	0.50	Senior Eng/Geologist CONDITIONS EVALUATION AND CLIENT DISCUSSIONS	37.50
T	18 APR 1989	6.00	Field Technician II MONITOR SOIL REMOVAL AND TECHNICAL DIRECTION	264.00
T	18 APR 1989	6.00	Field Vehicle	24.00
T	28 APR 1989	1.00	AERIAL PHOTOGRAPHY	82.70
T	28 APR 1989	1.00	AERIAL PHOTOGRAPHY	60.00

Current Charges	7198.10
Previous Balance	2141.10
Balance due	9339.20

THANK YOU

DUPLICATE

301 000215

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1761
18 MAY 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

DATE	QTY	SERVICE	CHARGES
PROJ.10221-00 PO 104270 SB WHS			
G — 26 APR 1989	9.50	PROJECT ENG/GEO REPORT PREPARATION/GEOLOGY AND SEISMICITY	617.50
G 25 APR 1989	5.20	SENIOR ENG\GEO REPORT PREPARATION	390.00
G 25 APR 1989	1.00	PRINCIPAL ENGINEER/GEOLOGIST REVIEW REPORT	90.00
G 26 APR 1989	3.50	WORD PROCESSING	105.00
G 26 APR 1989	0.75	SECRETARIAL SERVICES	18.75
G 26 APR 1989	1.00	REPRODUCTIONS	4.25
G 26 APR 1989	1.00	COURIER SERVICE ATTEN CARLOS CADIZS	61.20
G 26 APR 1989	1.00	COURIER SERVICE ATTENTION TOM PUSKISS	69.60
G 26 APR 1989	1.00	COURIER SERVICE ATTENTION RAUL RAMIREZ	54.00
T 17 APR 1989	1.00	EPA 8015 & 602 - W/EPA 7621 6 HOUR RUSH 200%	612.00

Current Charges	2022.30
Previous Balance	9339.20
Balance Due	11361.50

THANK YOU

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

Invoice # 1814
2 JUN 1989

COCA-COLA ENTERPRISES WEST
1334 SOUTH CENTRAL AVENUE
LOS ANGELES, CALIFORNIA 90021

	DATE	QTY	SERVICE	CHARGES
	PROJ.10221-00 PO 104270 SB WHS			
G	11 MAY 1989	2.00	PRINCIPAL ENG\GEO REPORT PREPARATION/ASPHALT DESIGN	180.00
T	3 APR 1989	2.00	Senior Eng/Geologist 3/23/89 SAMPLING AND LABORATORY COORDINATION	150.00
T	3 APR 1989	2.50	Senior Eng/Geologist 3/24/89 SAMPLING AND LABORATORY COORDINATION	187.50
T	3 APR 1989	1.00	TANK REGISTRATION 3/27/89 LOS ANGELES CITY CLERK TAX AND PERMIT DIVISION	165.50
T	14 APR 1989	2.50	ENVIRONMENTAL CHEMIST RESEARCH & PHOTO AQUISTION	137.50
T	24 APR 1989	1.00	Senior Eng/Geologist CLIENT AND CONTRACTOR DISCUSSIONS AND COORDINATION OF SITE ACTIVITIES	75.00
T	25 APR 1989	1.00	Senior Eng/Geologist CLIENT AND CONTRACTOR DISCUSSIONS AND COORDINATION OF SITE ACTIVITIES	75.00
T	27 APR 1989	3.00	Senior Eng/Geologist AERIAL PHOTO EVALUATION AT WHITTIER COLLEGE	225.00
T	28 APR 1989	0.50	Senior Eng/Geologist CLIENT DISCUSSION	37.50
T	1 MAY 1989	4.50	Senior Eng/Geologist MEETING WITH CLIENT AND CONTRACTOR AT ANCON IN WILLMINGTON/OFFICE CALCULATIONS/CLIENT DISCUSSIONS	337.50
T	10 MAY 1989	1.00	FAIRCHILD/AERIAL PHOTOS	390.00

rtween Removal of Hazard

DUPLICATE

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

301 000217

			TWO CONTACT PRINTS AND TWO 4X ENLARGEMENTS	
T	13 MAY 1989	4.00	Senior Eng/Geologist TRIP TO SITE FOR TECHNICAL DISCUSSION	300.00
	15 MAY 1989	1.00	Senior Eng/Geologist TECHNICAL DIRECTION AND CLENT DISCUSSION AND SITE INSPECTION	75.00
Sid ASE II (Removals	15 MAY 1989	8.00	Field Technician II MONITOR SOIL REMOVAL	352.00
T	15 MAY 1989	8.00	Field Vehicle	32.00
T	19 MAY 1989	8.00	Field Technician II MONITOR SOIL REMOVAL	352.00
T	19 MAY 1989	8.00	Field Vehicle	32.00
T	19 MAY 1989	2.50	Senior Eng/Geologist TECHNICAL DIRECTION AND CLIENT DISCUSSIONS/SITE INSPECTION	187.50
G	17 MAY 1989	1.00	PRINCIPAL ENG\GEO REVIEW FOUNDATIONS	90.00
G	16 MAY 1989	1.00	WORD PROCESSING 2 LETTERS 9-0673 & 9-0675	20.00
G	16 MAY 1989	0.50	SECRETARIAL SERVICES 1 EXTRA REPORT COPY #9-0624	12.50
G	16 MAY 1989	40.00	40 PAGES REPRODUCED/EXTRA RPT FOR CADIZ AND CADIZ ARCHITECTS	4.00
G	16 MAY 1989	1.00	FEDERAL EXPRESS/EXTRA REPORT	15.00

Current Charges	[illegible]
Previous Balance	[illegible]
Balance Due	[illegible]

THANK YOU

DUPLICATE

301 000218

Coca-Cola Enterprises Inc
P.O. Box 1778
Atlanta, GA 30301
404 676-2100
Telecopier: 404 676-7165

File

Torrance

$900 =

Coca-Cola Enterprises
A Bottling System

Legal Division

December 19, 1990

Vincent K. Carroll, Esq.
2105 East 4th Street
Long Beach, California 90814

Re: Moreco

Dear Mr. Carroll:

Thank you for your letter of December 12, 1990, with the attachments of the manifests and the bills of lading.

The information that you provided relates to nonhazardous soil that was sold to Brent Petroleum Corporation. As I understand the facts, this soil was used by Brent Petroleum Corporation to manufacture asphalt.

The manifests and bills of lading do not suggest that any of the dirt went to any other company or location than Brent Petroleum. Thus, I am still unable to respond to your request for the removal of the dirt on Moreco's property due to lack of information.

If you will forward information relating to the location of the Moreco property, the alleged hazardous constituents of the dirt on the Moreco property, and any manifest, documentation, or other information relating to the origin of that dirt, I will be able to respond to your request. The documentation you supplied shows that the nonhazardous soils were properly disposed.

Should you have any questions, or need further information, please feel free to contact me at 404/676-2361.

Sincerely yours,

Jeffrey G. Simmons
Real Estate/Environmental
Counsel

JGS/jac
lvin.doc

300 000679

bcc: Mr. Raul Rameriz
Mr. Ed Todd
Mr. Steve Myers

VINCENT K. CARROLL
ATTORNEY AT LAW
2106 EAST FOURTH STREET
LONG BEACH, CALIFORNIA 90814
TELEPHONE (213) 434-9904

VINCENT K. CARROLL
OF COUNSEL
JOHN E. CARROLL
DONALD F. FORRESTER
STEPHEN E. COCKRIEL

FACSIMILE
(213) 433-0470

FRANCIS ROBERT BERGMANN
(1927-1988)

October 26, 1990

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 1
To Steve Myers	From Jeff Simmons
Co. W.S. Tec.	Co. CCE
Dept.	Phone 404-676-2361
Fax # 602-829-6315	Fax # 404-515-0231

Coca-Cola Bottling Company
1334 South Central
Los Angeles, CA 90021

Attention: Legal Department

Re: Hazardous Dirt

Dear Sir or Madam:

I have been retained by Moreco with respect to property it owns in the Cities of Long Beach and Wilmington. After completing an initial investigation and after talking to the Air Quality Control Management District, it has been brought to their attention that hazardous dirt from the Coca-Cola facility at 190th Street in Los Angeles has been dumped on Moreco's premises.

As you are well aware, all parties in the chain who had any connection with the dirt are liable for the removal and cleaning up of the hazardous material. Obviously, this would include Coca-Cola. We feel it is in the best interest of all parties to have the dirt removed and the site cleaned up immediately. Please contact the undersigned at your earliest convenience to discuss the above.

Very truly yours,

Vincent K. Carroll

VKC:mbg

cc: Mary Moore

VINCENT K. CARROLL
ATTORNEY AT LAW
2108 EAST FOURTH STREET
LONG BEACH, CALIFORNIA 90814
TELEPHONE (213) 434-9904

VINCENT K. CARROLL
OF COUNSEL
JOHN E. CARROLL
DONALD F. FORRESTER
STEPHEN E. COCKRIEL

FACSIMILE
(213) 433-0470

FRANCIS ROBERT BERGMANN
(1927-1988)

RECEIVED
JAN -7 1991

December 31, 1990

Jeffrey G. Simmons, Esq.
Coca-Cola Enterprises
P. O. Box 1778
Atlanta, GA 30301

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 1
To Steven Myers	From Jeff Simmons
Co. L.S. Tec	Co. CCE
Dept.	Phone # 404-676-2361
Fax # 602-929-6315	Fax # 404-515-0231

Re: Moreco

Dear Mr. Simmons:

In response to your letter of December 19, 1990, please allow me to clarify our position. On or about March, 1990, Brent Petroleum leased a large tract of land at 1008 Cervera from my client. As you can see from the bills of lading that were sent to you, the dirt in question was taken to the Cervera property. Mr. Bouchard, the principle of Brent Petroleum, informed my client that he was going to turn this non-hazardous dirt into asphalt. However, this dirt was taken to the Cervera property and dumped without any intention on behalf of Mr. Bouchard or Brent Petroleum to turn it into asphalt. Enclosed with this letter are soil samples that we had taken on the property.

It should be noted that the only reason this land was leased from my client was that at the same time Mr. Bouchard was apparently being removed from another tract of land where he was doing the exact same thing. You may wish to contact Douglas G. Tennant at Kelly, Drye & Warren (213) 689-1300 with regard to related cases against Mr. Bouchard and Brent Petroleum.

Please contact me should you need any further information.

Very truly yours,

Vincent K. Carroll

VKC:mbg

VINCENT K. CARROLL
ATTORNEY AT LAW
2106 EAST FOURTH STREET
LONG BEACH, CALIFORNIA 90814
TELEPHONE (213) 434-9904

VINCENT K. CARROLL
OF COUNSEL
JOHN E. CARROLL
DONALD F. FORRESTER
STEPHEN E. COCKRIEL

FACSIMILE
(213) 433-0470

FRANCIS ROBERT BERGMANN
(1937-1988)

RECEIVED
JAN -7 1991

December 31, 1990

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 1
To Steven Myers	From Jeff Simmons
Co. L.S. Tec	Co. CCE
Dept.	Phone # 404-676-2361
Fax # 602-929-6315	Fax # 404-515-0231

Jeffrey G. Simmons, Esq.
Coca-Cola Enterprises
P. O. Box 1778
Atlanta, GA 30301

Re: Moreco

Dear Mr. Simmons:

In response to your letter of December 19, 1990, please allow me to clarify our position. On or about March, 1990, Brent Petroleum leased a large tract of land at 1008 Cervera from my client. As you can see from the bills of lading that were sent to you, the dirt in question was taken to the Cervera property. Mr. Bouchard, the principle of Brent Petroleum, informed my client that he was going to turn this non-hazardous dirt into asphalt. However, this dirt was taken to the Cervera property and dumped without any intention on behalf of Mr. Bouchard or Brent Petroleum to turn it into asphalt. Enclosed with this letter are soil samples that we had taken on the property.

It should be noted that the only reason this land was leased from my client was that at the same time Mr. Bouchard was apparently being removed from another tract of land where he was doing the exact same thing. You may wish to contact Douglas G. Tennant at Kelly, Drye & Warren (213) 689-1300 with regard to related cases against Mr. Bouchard and Brent Petroleum.

Please contact me should you need any further information.

Very truly yours,

Vincent K. Carroll

VKC:mbg

USTEC U.S. Technical Environmental Consulting, Inc.

May 14, 1990

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: 19875 PACIFIC GATEWAY DRIVE. REMOVAL OF CONTAMINATED SOIL. JOB NO. 89007.

Dear Mr. Ramirez:

Enclosed please find the copies of the Non-Hazardous Waste Data Forms used in the transportation of soil from the Carson project located at 19875 Pacific Gateway Drive, Carson, California. Also, please find enclosed copies of the weight tickets and tickets representing the rental of the loader. In summary, a total of 1628.38 tons was transported to Brent Petroleum Corporation located at 1008 South Cervera Avenue, Wilmington, California.

On Wednesday, March 28, 1990, the work was initiated. The soil was loaded onto end-dump type trucks using a 980C loader. The loader had a bucket capacity of 4 yards and could load a truck in approximately three minutes. After each truck was loaded the load was covered with a tarp. The truck then proceeded to the recycling facility mentioned above. The empty trucks returned to the site for additional loads. In total, six trucks were used to transport the material.

On Thursday, March 29, 1990, the remaining soil was transported to the recycling facility. Brent Petroleum is invoicing you directly for the disposal of the materials and has also provided you with a certificate of reuse for the material. Copies are attached. Please contact us if you have any questions or comments.

Sincerely

U.S. TECHNICAL ENVIRONMENTAL CONSULTING

Peter A. Beaver
Manager Remediation Services

Steven M. Myers, R.G.
President

Copy to: Ed Todd, CCE - Atlanta

300 000684

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

Brent Petroleum Corporation

Telephone: (213) 432-5991
Telex: 188030-BPC OIL
FAX: (213) 437-7815

100 Oceangate, Suite 1024
Long Beach, CA 90802

CERTIFICATE OF REUSE

GENERAL WASTE QUESTIONAIRE	COMPLETED YES
WASTE PROFILE FORM	COMPLETED YES
T.M. # ISSUED	COMPLETED 066-S
HAZARDOUS	COMPLETED NO
NON-HAZARDOUS	COMPLETED YES
R.C.R.A.	COMPLETED NO

B.P.C. CHARACTERIZATION:

THIS IS TO CERTIFY THAT 1,628.38 TONS OF NON-HAZARDOUS CONTAMINATED SOIL WAS DELIVERED TO BRENT PETROLEUM'S FACILITY ON MARCH 28TH AND 29TH, OF 1990.
TRANSPORTED BY- HAWK WING INCORPORATED
PER- U.S. TECHNICAL INCORPORATED•1414 W. BROADWAY RD.,STE. 150•TEMPE,AZ 85282
JOB LOCATION- COCA-COLA ENTERPRISE WEST•1334 S. CENTRAL AVENUE•LOS ANGELES, CA
ANALYSIS ON FILE.

BRENT PEROLEUM CORPORATION, E.P.A. I.D.# CAD981458466, CERTIFIES THAT THE ABOVE MATERIAL WAS ACCEPTED INTO BRENT'S FACILITY IN COMPLIANCE WITH TITLE 22 OF THE CALIFORNIA HEALTH & SAFETY CODE AND SENATE BILL 4636. THE MATERIAL HAS BECOME THE SOLE PROPERTY OF BRENT PETROLEUM CORPORATION AND IS IN THE PROCESS OF BEING RECYCLED IN ACCORDANCE WITH STATE AND FEDERAL LAWS.

DATE: MARCH 30, 1990

X Margaret A. Pimentel
MARGARET A. PIMENTEL,
SALES COORDINATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 0001
2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	0022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37914
GROSS 79580
TARE 33,140
NET. 46,440

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Kenneth Cope
Signature: Kenneth Cope
Month Day Year: 06 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000690

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 16 12 0 90

ORIGINAL — RETURN TO GENERATOR

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. .E.X.E.M.P.T.....
Manifest Document No. 0.0.0.2.0
2. Page 1 of 1
#20

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name
W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number .E.X.E.M.P.T.....

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number C.A.D.9.8.1.4.5.8.4.6.6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0·0·2	D·T	0·0·0·2·2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37900
GROSS 81,520
TARE 33,140
NET 48,380

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. X [signature]

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Kenneth Cope
Signature: Kenneth Cope
Month Day Year: 06 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space
300 000691

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: [signature]
Month Day Year: 6 28 90

ORIGINAL — RETURN TO GENERATOR

FILE-
89007

STATE OF CALIFORNIA

STATE BOARD OF EQUALIZATION

1020 N STREET, SACRAMENTO, CALIFORNIA
(P.O. BOX 942879, SACRAMENTO, CALIFORNIA 94279-0001)

Telephone (916) 739-2582

WILLIAM M. BENNETT
First District, Kentfield

CONWAY H. COLLIS
Second District, Los Angeles

ERNEST J. DRONENBURG JR.
Third District, San Diego

PAUL CARPENTER
Fourth District, Los Angeles

GRAY DAVIS
Controller, Sacramento

CINDY RAMBO
Executive Director

November 21, 1990

Dear Feepayer:

Our records indicate that you have been assessed an Activity Fee in connection with a site mitigation overseen by the Department of Health Services (Department). If the site mitigation is performed under a Remedial Action Plan (RAP) approved by the Department or the Regional Water Quality Control Board (Water Board) pursuant to Section 25356.1 of the Health and Safety Code, you may be entitled to a partial exemption from the Disposal Fee and Superfund Tax.

Section 25345.3 of the Health and Safety Code provided an exemption from the Disposal Fee and the Superfund Tax for hazardous waste submitted for disposal pursuant to an approved RAP. This exemption expired on September 30, 1990.

In place of this exemption Senate Bill 1857 (Chapter 1268, Statutes of 1990) created a new, partial exemption for this waste. The new exemption provides that the waste will be assessed fees and taxes at a fraction of the full rates. The rates are as follows:

PERIOD	PERCENT OF APPLICABLE RATE
10/01/90 to 06/30/91	45% of applicable rate
07/01/91 to 06/30/92	55% of applicable rate

These rates apply to both the Disposal Fee and the Superfund Tax.

To qualify for reporting waste disposals at these reduced rates you must have a RAP which has been prepared or approved by the Department of Health Services or the Regional Water Quality Control Board pursuant to Section 25356.1 of the Health and Safety Code. For purposes of this exemption, RAPs do not include remedial orders issued by local agencies, or imminent and substantial endangerment orders issued by the Department or Water Board, or remedial actions ordered by the United States Environmental Protection Agency.

You are required to file special Hazardous Substances Tax (Disposal Fee) and Superfund Tax Returns to report wastes disposed of pursuant to your RAP. Only wastestreams identified in the RAP may be reported on these returns. Wastestreams not addressed in the RAP should be reported on your regular Hazardous Substances Tax (Disposal Fee) and Superfund Tax Returns. The special Hazardous Substances Tax Return will be for waste submitted for disposal during the period 10/01/90 to 12/31/90. It will be due on or before 01/31/91. The special Superfund Tax Return will be for the same period, and will be due on or before 03/01/91.

If you are currently operating pursuant to an approved RAP, please contact us so that we may register you and send you the appropriate returns. If you have more than one site for which a RAP has been issued, you are required to have a separate account with us for each site. To contact us regarding your registration, or if you have any questions regarding these fees, you may write to, or telephone the Environmental Fees Section at the address and telephone number shown on this letter.

Robert M. Frank
Supervisor, Environmental Fees Section
State Board of Equalization

DT:ba

U.S. Technical Environmental
Consulting, Inc.

October 29, 1990

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: 18975 PACIFIC GATEWAY DRIVE, CARSON, CALIFORNIA. JOB NO. 89007.

Dear Raul:

This letter is in response to your request for a written report regarding the "redetermination" process at the Coca-Cola facility at 18975 Pacific Gateway Drive in Carson, California.

In a letter to U.S. Technical Environmental Consulting, Inc. (USTEC) from the California State Board of Equalization dated September 4, 1990, it was stated that the Department of Health Services is not currently recognizing the self-certification processes and as a result, the review fee of $7,500.00 was due. The letter also stated that additional reasons or re-affirmation of our desire for a hearing was required.

USTEC re-affirmed our desire for a hearing based on two premises. One, that the self-certification process was in effect at the time the investigation was completed and the report submitted. According to Mr. Manny Alanzo of DHS, the self-certification was re-evaluated in March of 1990. USTEC feels it is inappropriate to apply the fee in this manner. Second, the site is currently under investigation as part of a U.S Environmental Protection Agency consent order issued to the Montrose Chemical Company. Recent results of this investigation (conducted by Hargis and Associates) indicates a substantial amount of volatile organic contamination on the groundwater beneath the Coca-Cola property. It seems redundant and inappropriate to apply the redetermination fee to a site already known to have an environmental problem attributable to another responsible party.

As is always the case with regulation agencies, there is no guarantee that they will recognize the logic here. In that case, Coca-Cola will be responsible for payment of the $7,500.00 fee and for conducting a Preliminary Endangerment Assessment. Such an assessment will almost certainly involve Coca-Cola in further assessment and potential cleanup even though Coca-Cola is not a contributor.

I have attached a copy of the DHS requirements for the PEA. As you can see, the requirements are substantial.

300 000688

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315
Tempe, Arizona • Tampa, Florida

Coca-Cola Enterprises - West
Job No. 89007

At this point, the last option appears to be for the hearing. As of this date, no date has been received from the Board. As additional data becomes available to USTEC, we will forward it to you.

As always, it is a pleasure to be of service to Coca-Cola Enterprises, Inc. Should you have any questions, please call me at (602) 829-6311.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Steven M. Myers

Steven M. Myers, R.G.
President

/weh

Attachment

Copies to: Ed Todd, CCE - Atlanta, w/attachment
Steve McConnell, CCE - West, w/attachment

health and environmental threats posed by currents site conditions. The fee for conducting a PEA is $ 7,500 regardless of site size.

Chapter 269 requires the State Board of Equalization (Board) to collect the fees established by the Department under the Act. You may expect to receive a demand from the State Board in the near future based on the fee levels described herein. As each phase of activity associated with a fee is completed at the site, a demand for the fee that is associated with the next phase of activity will be sent to you by the State Board. In cases where fees are not paid promptly, the State Board is empowered to seize personal as well as business assets and take other enforcement actions to ensure payment.

Please contact Manny Alonzo at (213)590-4904 if you have any questions regarding this new program or required actions at the site.

Sincerely,

John J. Kearns

John J. Kearns
Regional Administrator

Enclosures

cc: Raul Ramirez
Coca Cola Enterprises West
1334 South Central Avenue
Los Angeles, CA 90021

ATTACHMENT A

SB 475: Site Size Definitions

Site Sizes	Small site - RI/FS* cost less than $250K and FRA+ less than $1M
	Medium site - RI/FS cost between $250K and $1.25M and FRA between $1M and $5M
	Large site - RI/FS cost between $1.25M and $5M and FRA between $5M and $20M
	Extra-Large site - RI/FS cost greater than $5M and FRA greater than $20M
Removal Action (RA)	Small RA - less than $500K
	Medium RA - $500K to $1M
	Large RA - $1M to $5M
	Extra-Large RA - greater than $5M
Operation and Maintenance (O&M)	Small O&M - Annual cost less than $500K
	Medium O&M - Annual cost $500K to $1M
	Large O&M - Annual cost $1M to $5M
	Extra-Large O&M - Annual cost greater than $5M

* RI/FS = Remedial Investigation/Feasibility Study
\+ FRA = Final Remedial Action

SB 475 Fee Schedule

Site Size Estimation Fee	$5,000 (applicable to all sites)
Endangerment Assessment Fee	$7,500 (applicable to all sites)
Removal Action Oversight Fee	Variable, dependent on site size: $14,500 (small sites) $37,000 (medium sites) $73,500 (large sites) $147,000 (extra-large sites)
Remedial Investigation/Feasibility Study (RI/FS) Oversight Fee	Variable, dependent on site size: $21,500 (small sites) $43,000 (medium sites) $85,500 (large sites) $200,000 (extra-large sites)
Remedial Action Plan (RAP) Oversight Fee	Variable, dependent on site size: $4,500 (small sites) $9,000 (medium sites) $18,000 (large sites) $38,000 (extra-large sites)
Remedial Design Oversight Fee	Variable, dependent on site size: $7,500 (small sites) $14,500 (medium sites) $29,000 (large sites) $80,000 (extra-large sites)
Final Remedial Action (FRA) Oversight Fee	Variable, dependent on site size: $10,000 (small sites) $20,000 (medium sites) $40,000 (large sites) $106,000 (extra-large sites)
Operation and Maintenance (O&M) Oversight Fee	Variable, dependent on site size: $6,000 per year (small sites) $12,000 per year (medium sites) $14,000 per year (large sites) $34,000 per year (extra-large sites)

Prorating/Adjusting SB 475 Fees

I. Prorating Fees

SB 475 fees take effect July 1, 1989. Fees for phases of site investigation and cleanups in progress as of that date are to be prorated as described below. Fees will not be assessed for phases completed prior to July 1, 1989; instead, there will be 100% cost recovery per H&SC 25360.

To prorate the fee:

1. identify phase of activity in progress on July 1, 1989, and site or activity size;
2. identify defined length of activity;
3. divide activity fee by number of months defined for activity;
4. the result is the ***monthly fee quotient***;
5. multiply number of months the site has been in the phase of activity (as of July 1, 1989) by monthly fee quotient; and
6. subtract that amount from total fee.
7. The result is the ***prorated fee***.

For fee proration purposes, SB 475 stipulates the following timeline for phases of site activity:

Estimation of Site Size	**3 months (all sites)**
Preliminary Endangerment Assessment	**3 months (all sites)**
Removal Actions	**4 months (small sites)** **6 months (medium sites)** **12 months (large sites)** **24 months (extra-large sites)**
Remedial Investigation/ Feasibility Study (RI/FS)	**9 months (small action)** **17 months (medium action)** **33 months (large action)** **60 months (extra-large action)**
Remedial Action Plan (RAP)	**3 months (small sites)** **3 months (medium sites)** **6 months (large sites)** **9 months (extra-large sites)**
Remedial Design (RD)	**2 months (small sites)** **3 months (medium sites)** **6 months (large sites)** **12 months (extra-large sites)**
Final Remedial Actions	**4 months (small sites)** **8 months (medium sites)** **20 months (large sites)** **40 months (extra-large sites)**
Operation and Maintenance (O&M)	**12 months per year (all sites)**

For fee assessment purposes, RI/FS activity will not be considered to be commenced prior to the date that DHS approved an RI/FS workplan. For determining the start date for other phases of activity that may be ongoing, the following will apply:

- the RAP phase begins on the date the final RI/FS report was approved by DHS.
- the RD phase begins on the date the final RAP was approved by DHS.
- the final remedial action phase begins on the date the final remedial design was approved by DHS.
- the O&M phase begins on the date that the site cleanup certification form was signed by DHS.

II. Adjusting Fees

DHS is authorized to reclassify site size at any time. However, for fee assessment purposes, the new size classification would only apply to fees assessed for subsequent phases of site investigation and cleanup activity and not to completed or current phases.

III. Additional Charges to RPs

Although SB 475 has established specific fees to be charged to RPs for site investigation and cleanup oversight, the law continues to require DHS to recover all identifiable costs beyond those covered by the fees. Essentially, the new fees are analogous to "downpayments" against future cost recovery actions, since actual oversight costs will be in excess of the fees established by SB 475.

TORRANCE

STATE OF CALIFORNIA

OFFICE MEMO
STD 100 (REV 10/87)
87 44331

DATE: 2-08-90

TO: Mr. Peter Beard
U. S. TECH

ROOM/STA NO:

FROM: Manny Alonso

PHONE NUMBER: (213) 590-4404 ATSS ☐

ROOM/STA NO.:

SUBJECT: PEA info.

The enclosed information on the preliminary endangerment assessment has been obtained from a draft document. Some changes might be possible to occur. These changes might include Rick assessment data. I hope this info is of help to you.

300 000740

Put your thoughts to work. Submit a **MERIT AWARD SUGGESTION.**

The Preliminary Endangerment Assessment (PEA) was established as part of the Department of Health Services'(DHS) Toxic Substances Control Program(TSCP) hazardous waste site cleanup process effective July 1, 1989. This assessment is defined in Section 25319.5, Chapter 6.8, Division 20 of the California Health and Safety Code as:

> "25319.5. Preliminary endangerment assessment means an activity which is performed to determine whether current or past waste management practices have resulted in the release or threatened release of hazardous substances which pose a threat to public health or the environment."

Based on this definition, the PEA has been designed specifically to be the initial TSCP process for evaluating potential hazardous substance release sites. The PEA has three primary objectives. First, the assessment must determine if a release of hazardous substances has or has not occurred at the site. The second objective is to determine if an immediate stabilization action is warranted at the site to mitigate direct threats to public health and the environment posed by a release of hazardous substances or by situations that may result in a release of hazardous substances. In cases when a release of hazardous substances has occurred at a site, a third objective is to determine if the site poses a threat to Public health and the environment and requires remediation.

Private parties are now allowed to participate with the TSCP in conducting initial site evaluations as the result of the passage of Senate Bill 475. This bill added Section 25347.6 to the Health and Safety Code to allow the TSCP to oversee "removal or remedial action" work carried out by private parties on a fee-for-service basis. Activities such as the PEA are, by statutory definition (Health and Safety Code, Section 25322), considered to be within the category of remedial actions. The fee prescribed for the oversight of the PEA in Section 25347.6(d) is $7,500.00.

Pursuant to Section 25347.6, the PEA process has been separated into two distinct phases. The first phase, collection of data and preparation of a PEA report, is the responsibility of the private party requesting that a site be evaluated. The second phase, consisting of evaluation of the data/PEA report and issuance of a determination on the need for cleanup actions at the site, is the responsibility of the TSCP.

The overall roles and responsibilities of the TSCP and private parties in the PEA process are shown on Figure 1. The TSCP staff are responsible for: 1) initiating the billing of the private party by the State Board of Equalization for the $7,500.00 fee; 2) meeting with the private party to explain the PEA process and PEA report requirements; 3) conducting an agency records check and site inspection to familiarize themselves with the site being evaluated; 4) providing guidance to the private party relative to preparation of the PEA report; 5) overseeing any sampling done at the site by the private party; 6) reviewing the PEA report for completeness and

300 000741

issuance of a determination of completeness; and 7) evaluating the data in the report and making a determination regarding the need for site cleanup actions at the site.

Several options are available to the TSCP staff in making a recommendation based on review of a PEA report. A no "No Further Action" recommendation is made in cases when no release of hazardous substances has occurred and this situation can be clearly documented and in cases when a release has occurred but the site does not present a threat to public health and the environment. In cases where a release has been documented and a threat exists, the recommendation would consist of moving the site forward into characterization and formal remediation. All sites considered to pose a medium to high threat will be required to carry out characterization and remediation activities under direct TSCP oversight. For sites considered to pose a low threat, the private parties will be provided with a list of approved site characterization and remediation procedures and they will be allowed to carry out this work without direct TSCP oversight. Two other recommendations are also possible when contamination exists. A stabilization action may be recommended for sites that pose an immediate threat to public health and the environment. Stabilization may consist of fencing the site, capping the contaminated area, removing degraded containers of hazardous substances, and other similar actions. A final option for a recommendation is to refer cleanup oversight of a contaminated site to another agency. This situation would occur in cases such as when the contamination is associated with a leaking underground storage tank. This sites would be referred because the Regional Water Quality Control Boards (RWQCB) and County Health Departments have been given the lead responsibility in this area Pursuant to Chapter 6.7. Division 20 of the California Health and Safety Code. The site would also be referred if other agencies have already initiated oversight of cleanup operations.

The primary responsibility of a private party in the PEA process is preparation of the PEA report. Specific responsibilities of the private party include: 1) submitting a written request to the TSCP to complete a PEA on a specific site; 2) payment of the $7,500.00 to the to the State Board of Equalization when billed for the fee; 3) meeting with the TSCP staff to receive the PEA Report Manual and to discuss completion of the assessment; 4) preparation of the PEA report in accordance with the specifications provided by the TSCP; and 5) modification of the report if necessary in accordance with a "Notice of Deficiency" issued by the TSCP staff and resubmittal of the report.

Several points regarding preparation of PEA reports need to be emphasized and kept in mind throughout the report preparation process. The primary focus of the reports must be on presenting the site specific data required by the PEA manual as clearly and concisely as possible. Using lists, bulleted outlines, tables and figures are preferable over long discussions. Failure to clearly provide the data required in the initial report will result in issuance of a "Notice of Deficiency" by the TSCP staff subsequent

to review of the report. If the report is not modified and resubmitted within 30 days or if the report is resubmitted in a form that is not responsive to the Notice of Deficiency it will be rejected and the PEA process for the site will be terminated. Reinitiation of the assessment process will require payment of a second $7,500.00 fee.

Since sites will be ranked in accordance with the Uncontrolled Hazardous Waste Site Ranking System; A Users Manual (reference: 40 Code of Federal Regulations, part 300 Appendix A), factors required under the Hazard Ranking System (HRS) are particularly important. The PEA manual provides suggested references for the various information requirements. Use of these references is not mandatory but in the event of conflicting information, these references will be considered authoritative unless a private party can clearly prove otherwise.

It may be appropriate to abbreviate the PEA report in some cases. This situation would occur when Section A, Site History and Description; Section B, Apparent problem; and Section C, Sampling Activities, clearly document that no release of hazardous substances has occurred and no threat of a release exists. In these cases, Section D - Factors Related to Known or Potential Site Contamination, Section E - Analysis of Pathways for Hazard Potential, and Section F Community Assessment may be deleted. If the report is abbreviated, Section G - Conclusions should clearly state the basis for not including Sections D, E and F private parties are encouraged to work closely with the TSCP staff assigned to oversee the data collection effort in preparing the report and when making a decision on not including sections.

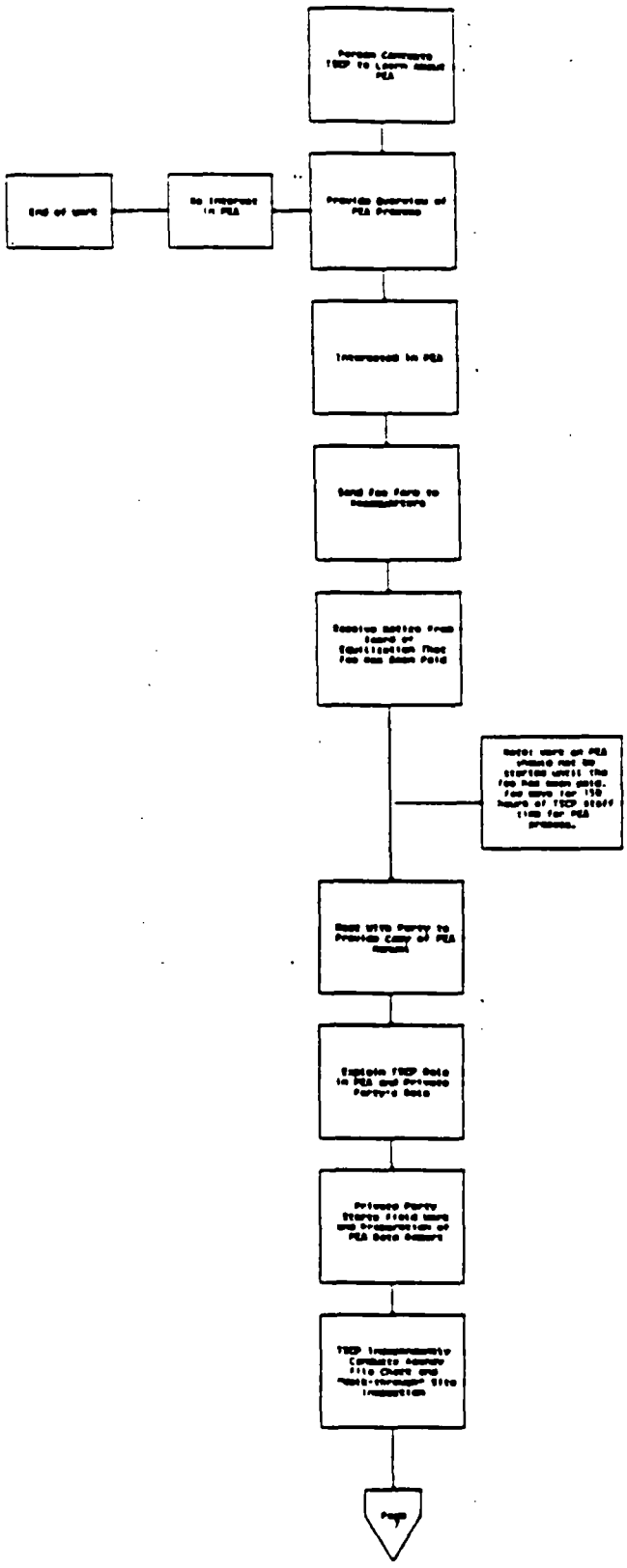


Figure 1
Process Flowchart for Oversight of a
Preliminary Endangerment Assessment

Draft 12/22/89

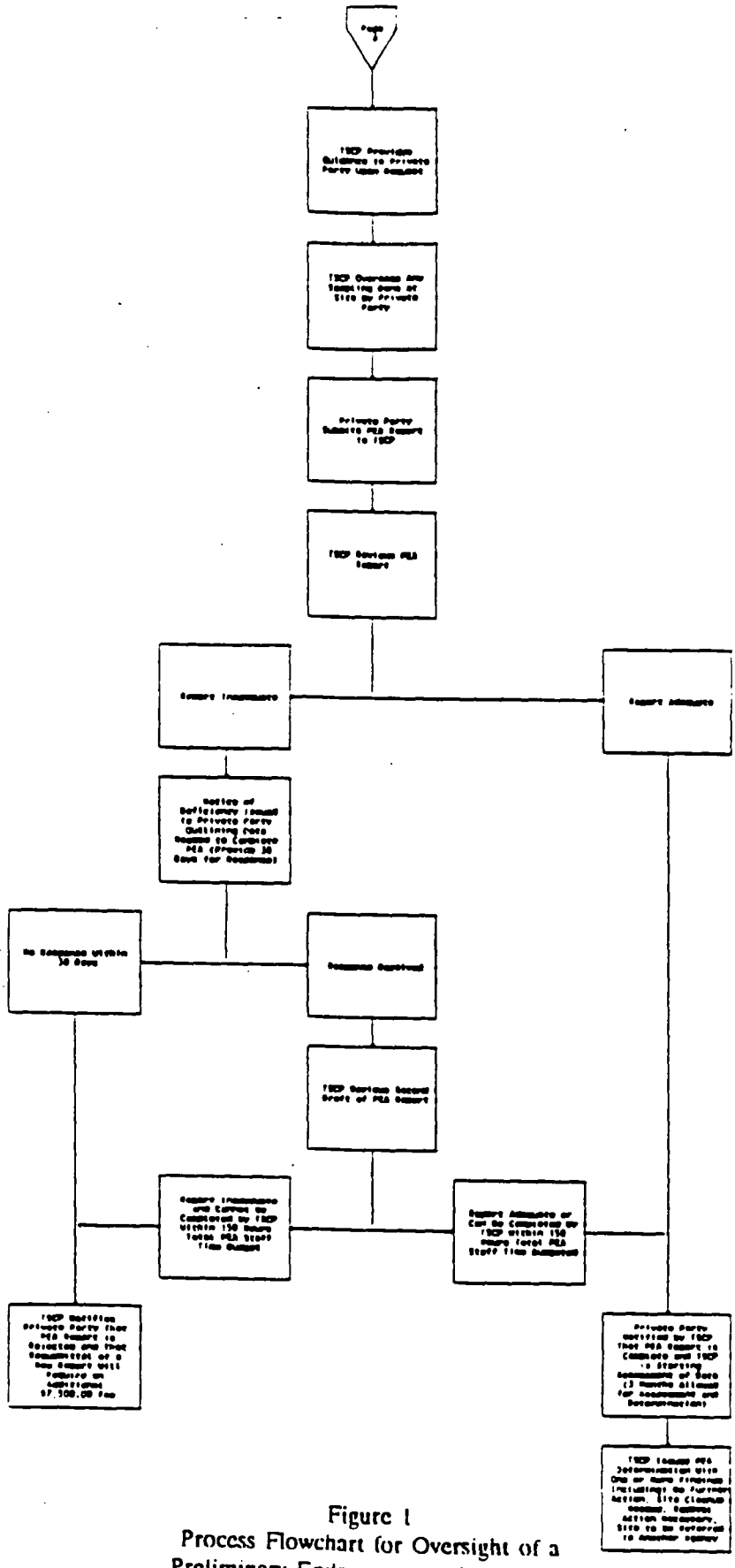


Figure 1
Process Flowchart for Oversight of a
Preliminary Endangerment Assessment

Draft 12/22/89

PRELIMINARY ENDANGERMENT ASSESSMENT CHECKLIST

Section	Location In Report	Adequate/ Inadequate
A. Site History and Description		
- Site Location:		
1) Facility Name	_____	_____
2) Street Address	_____	_____
3) Mailing Address	_____	_____
4) Phone Number	_____	_____
5) Other Names	_____	_____
6) EPA ID Number	_____	_____
7) ASPIS Number	_____	_____
8) Assessor's Parcel Number and Map	_____	_____
9) Township, Section, Range, Meridian	_____	_____
10) Map of Site Location	_____	_____
- Past and Current Site Activities:		
1) Business Type/Years of Operation	_____	_____
2) Facility Ownership/Operators	_____	_____
3) Property Owners	_____	_____
4) Process Description:		
a) Type/quantities of products	_____	_____
b) List of materials/chemicals used	_____	_____

Draft 12/22/89

Section	Location In Report	Adequate/ Inadequate
c) Descriptive overview of process	_____	_____
d) Map of All Site Features	_____	_____
- Hazardous Waste Management		
1) Waste Stream Identification and Waste Quantities	_____	_____
2) On Site Storage, Treatment, and Disposal:		
a) Description of storage units	_____	_____
b) Description of treatment units	_____	_____
c) Description of disposal practices	_____	_____
d) Description of containment of storage, treatment, disposal units	_____	_____
e) Description of recovery/recycling practices	_____	_____
f) Off-site wastes recovered; origin, type, quantity	_____	_____
3) Regulatory Status Identification	_____	_____
4) Agency Inspection Results Summary	_____	_____
B. Apparent Problem		
- Summary of Nature of Contamination at Site	_____	_____

Draft 12/22/89

Section	Location In Report	Adequate/ Inadequate
- Summary of Contaminants of Concern	_____	_____
- Justification for "No Further Action" Recommendation	_____	_____
C. Sampling Activities		
- Past Sampling Efforts	_____	_____
- PEA Sampling Efforts	_____	_____
- Analysis of Sampling Results	_____	_____
D. Factors Related to Known or Potential Site Contamination	_____	_____
- Hazardous Substances/Waste at the Site	_____	_____
- Characteristics of Hazardous Substances/Wastes:		
1) Physical State/Color	_____	_____
2) Molecular Weight	_____	_____
3) Specific Gravity or Density	_____	_____
4) Solubility	_____	_____
5) Freezing/Boiling/Melting Points	_____	_____
6) Vapor Pressure	_____	_____
7) Henry's Constant	_____	_____

Section		Location In Report	Adequate/ Inadequate
8)	Flashpoint	_____	_____
9)	Upper and Lower Explosive Limits	_____	_____
10)	NFPA Ignitibility Level Rating	_____	_____
11)	NFPA Reactivity Level Rating	_____	_____
12)	Incompatible Compounds	_____	_____
13)	pH	_____	_____
14)	Toxicity/Persistence Rating	_____	_____

- Exposure Routes and Toxicity:

1)	Exposure Data:		
	a) Description of Exposure Routes	_____	_____
	b) Description of Dispersion Mechanisms	_____	_____
	c) Timing of Releases	_____	_____
2)	Toxicity Data:		
	a) Description of Relative Toxicity	_____	_____
	b) General Toxicological Properties	_____	_____
	c) Standards (RfDs, etc.)	_____	_____

- Soil/Direct Contact Pathways

1)	Description of Soil Contamination and Recommendation	_____	_____
2)	Topography Description	_____	_____
3)	Land Use and Zoning Description	_____	_____

Section		Location In Report	Adequate/ Inadequate
4)	Description of Environmental Impacts	_____	_____
5)	Hydrologic Soil Group	_____	_____
6)	Description of Soil Permeability	_____	_____
7)	Description of Slope of Site	_____	_____
8)	Description of Soil Stability/Seismic Conditions	_____	_____
9)	Description of Site Accessibility	_____	_____
10)	Description of Containment Measures	_____	_____
11)	Locations of Sensitive Facilities (Schools, etc.)	_____	_____
12)	Locations of Sensitive Habitats	_____	_____

Factors Related to Water Pathways:

1)	Description of Water Contamination and Remediation	_____	_____
2)	Net Seasonal Perception	_____	_____
3)	Description of Hydrology	_____	_____
4)	For Interconnected Aquifers:		
	a) Distance to Nearest Well	_____	_____
	b) Population Using Water	_____	_____
	c) Irrigated Areas	_____	_____
5)	Aquifers Not Interconnected:		
	a) Distance to Nearest Wells	_____	_____
	b) Population Using Water From Each Aquifer	_____	_____
	c) Irrigated Areas for Each Aquifer	_____	_____

Draft 12/22/89

Section		Location In Report	Adequate/ Inadequate
6)	Ground Water Uses	_____	_____
7)	One Year/24-Hour Rainfall	_____	_____
8)	Distance to Nearest Downhill Surface Water	_____	_____
9)	Runoff Flow Distance and Water Intake Locations	_____	_____
10)	Runoff Control Measures	_____	_____
11)	Floodplain Identification	_____	_____
12)	Description of Migration Routes of Substance	_____	_____
13)	Description of Location and Uses of Surface Water Intakes	_____	_____
14)	Population Using/Acres Irrigated From Each Water Intake	_____	_____
15)	Distance to Wetland/Critical Habitat	_____	_____
16)	Sensitive Habitats That May be Affected by Runoff	_____	_____

Factors Related to Air Pathways:

1)	Description of Air Contamination and Remediation	_____	_____
2)	Wind Direction/Velocity	_____	_____
3)	Description of Local Climate	_____	_____
4)	Description of Timing of Release	_____	_____
5)	Description of Dispersion Routes	_____	_____

Draft 12/22/89

Section		Location In Report	Adequate/ Inadequate
6)	Populations of Residents/Workers	_____	_____
7)	Location/Distance to Sensitive Facilities (Schools, etc.)	_____	_____
8)	Location/Distance to Development Areas (Commercial/Industrial, etc.)	_____	_____
9)	Description of (Type, Location and Distance) Sensitive Areas (Wetlands, etc.)	_____	_____

E. Analysis of Pathways for Hazard Potential Determination

- Known Hazard:

1)	Contaminants Identified	_____	_____
2)	Target Populations/Environments Described	_____	_____
3)	Effects on Target Populations/Environments Described	_____	_____

- Potential Hazard:

1)	Contaminants Identified and Fate Described	_____	_____
2)	Potential Populations/Environments Identified	_____	_____
3)	Potential Effects on Human/Environmental Targets	_____	_____
4)	Uncertainty Factors	_____	_____

- No Potential Hazard:

STATE OF CALIFORNIA

STATE BOARD OF EQUALIZATION
1020 N STREET, SACRAMENTO, CALIFORNIA
(P.O. BOX 942879, SACRAMENTO, CALIFORNIA 94279-0001)
(916) 739-4957

WILLIAM M. BENNETT
First District, Kentfield

CONWAY H. COLLIS
Second District, Los Angeles

ERNEST J. DRONENBURG, JR.
Third District, San Diego

PAUL CARPENTER
Fourth District, Los Angeles

GRAY DAVIS
Controller, Sacramento

CINDY RAMBO
Executive Director

September 4, 1990

U.S. Technical Environmental Consulting
Mr. Peter Beaver
1414 W. Broadway Rd, Suite 150
Tempe, AZ 85282

Coca Cola Ent. - West
HC HQ 36-034839
Notice of Determination:
April 26, 1990

Dear Mr. Beaver:

We have received notification from the Department of Health Services (Department) regarding your client's petition for redetermination of the notice indicated above. The following information was provided by the Department.

The Department noted that the assessment report indicated possible contamination existing at the site located at 19875 Pacific Gateway Drive. Due to the possibility of contamination and the fact that the self-certification process is not currently recognized by the Department, a preliminary endangerment assessment must be completed. As a result, the fee assessed on April 26, 1990 is due.

If you are still in disagreement with the above, please submit additional reasons or reaffirm your request for a hearing within 30 days from the date of this letter. If a reply is not received within the specified time, we will presume that you are no longer interested in pursuing this matter and we will recommend redetermination without any adjustment.

Sincerely,

David McKillip
Supervising Auditor
Environmental Fee Unit

CR:cr

/cocacola

cc: Coca Cola Ent. - West
Mr. Raul Ramirez
1334 South Central Avenue
Los Angeles, CA 90021

Section	Location In Report	Adequate/ Inadequate
1) Factors Showing No Hazard Exists	_____	_____
F. Community Assessment		
- Summary of Community Concern	_____	_____
- Concerns/Issues Identified by Locals	_____	_____
- Community Views on Actions at Site	_____	_____
- Recommended Information Repositories	_____	_____
- Names/Addresses of Interested Parties	_____	_____
G. Conclusions		
- Release/Potential Release Identified	_____	_____
- Threat to Public Health/Environment Identified	_____	_____
- Stabilization Action Need Identified	_____	_____

Draft 12/22/89

U.S. Technical Environmental
Consulting, Inc.

May 21, 1990

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: **19875 PACIFIC GATEWAY DRIVE, HARGIS AND ASSOCIATES - MONTROSE CHEMICAL RESULTS OF MONITORING WELL INSTALLATION. JOB NO. 89007.**

Dear Raul:

We have been notified by a representative of Hargis and Associates, at the request of their client Montrose Chemical Corporation, of the results of the installation of the two monitor wells installed on and adjacent to the Pacific Gateway Drive site. In summary, a substantial amount of a volatile hydrocarbon material was found on the surface of the water table, at a depth of approximately 60 feet, in the wells. This is significant because no similar material occurred in any of the other wells installed in conjunction with the Montrose project. Those other wells are all located in an area to the south of the Carson site.

The presence of this material on the water table directly under the Pacific Gateway Drive site does not imply that a release occurred from the site. It is possible that the material is migrating from a source to the north, which is the upgradient direction.

The results of the work performed for the Montrose project are reported directly to the U.S. Environmental Protection Agency, since the Montrose site is under an EPA consent order. Also in the area within one mile are five other sites where subsurface investigations are being performed, the results of which are also being reported to EPA. In addition, the California DOHS and Regional Water Quality Control Board are also involved.

The result of all of this is that there will probably be EPA and California involvement in the Pacific Gateway Drive site and others to the north. The agencies could request that additional investigations be performed or even that remediation efforts be undertaken.

300 000755

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

Coca-Cola Enterprises - West
Pacific Gateway Drive

Our recommendation is to do nothing with regard to any further environmental work that might be required, until contacted by the respective agencies. However, we do recommend that Coca-Cola not enter into any final agreement with any previous owners of the site at this time.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Peter A. Beaver
Manager Remedial Services

Steven M. Myers, R.G.
President

/weh

USTEC
U.S. Technical Environmental
Consulting, Inc.

May 23, 1990

State Board of Equalization
Department of Business Taxes
1891 Alhambra Boulevard
Sacramento, California 95816

RE: PETITION FOR REDETERMINATION, ACCOUNT NO. HC HQ 36-034839, 19875 PACIFIC GATEWAY DRIVE, CARSON, CALIFORNIA. JOB NO. 89007.

Dear Sirs:

This letter serves as a Petition for an informal meeting with a hearing officer for a Redetermination in reference to the above stated account. This Petition is made on the basis that the activity on the site was wrongly determined by DOHS to be a Preliminary Endangerment Assessment. In reality, the limited activity performed was a Self-Certification action undertaken by the owners of the site, which is able to be performed without direct DOHS involvement.

The information submitted to DOHS was for notification of work to be performed on a site potentially involving hazardous waste. The results of the work performed showed that the materials in question were not hazardous with respect to Title 22 of the CAC, therefore DOHS involvement on the level of a Preliminary Endangerment Assessment is not justified.

Also for the record, please amend the name and address of the owner of the site to be:

Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021
Attn: Raul Ramirez
Telephone: 213-746-5555

300 000757

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

If you have any questions or comments, please contact the undersigned at (602) 829-6311.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Peter A. Beaver
Manager Remedial Services

Steven M. Myers, R.G.
President

/weh

cc: Raul Ramirez, CCE - West
Ed Todd, CCE - Atlanta
Steve McConnell, CCE - West

BT-1210 REV. 8 (12-86)

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001

RE: PM:
EFFECTIVE DATE OF PAYMENT
MO. DAY YEAR

IN REPLY REFER TO:

EXCISE TAX (ACTIVITY FEE) (916) 739-2582

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE: APRIL 26, 1990

ACCOUNT NUMBER
HC HQ 36-0348

RECEIVED
APR 30 1990

NOTICE OF DETERMINATION

YOU ARE HEREBY NOTIFIED OF AN AMOUNT DUE FROM YOU PURSUANT TO THE HAZARDOUS SUBSTANCES TAX LAW (ACTIVITY FEE).

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL
AS ASSESSED 03/08/90-03/08/90	7500.00			7500.00
L—0000				
TOTAL	7500.00			

[illegible] AMOUNT [illegible]

ADDITIONAL INTEREST [illegible]
DUE AT THE MODIFIED [illegible]
EACH MONTH, OR [illegible]

ADDITIONAL PENALTY [illegible]

THE ACTIVITY FEE INDICATED ABOVE HAS BEEN ASSESSED PURSUANT [illegible] 25347.6 OF THE HEALTH AND SAFETY CODE AND IS BASED UPON ACTIVITY PERFORMED BY THE DEPARTMENT OF HEALTH SERVICES.

THE ABOVE FEE IS BASED ON A PRELIMINARY ENDANGERMENT ASSESSMENT.

SITE : 19875 PACIFIC GATEWAY DRIVE

DOHS TRANSMITTAL NUMBER 90-4-12-SM

INFORMATION CONCERNING DETERMINATIONS

A PERSON AGAINST WHOM A DETERMINATION IS MADE OR ANY PERSON DIRECTLY INTERESTED MAY PETITION FOR REDETERMINATION WITH THE BOARD OF EQUALIZATION WITHIN 30 DAYS FROM THE DATE SHOWN AT THE TOP OF THIS NOTICE.

A PETITION MUST BE IN WRITING AND STATE THE SPECIFIC GROUNDS UPON WHICH IT IS FOUNDED. ANYONE FILING A PETITION SHOULD BE PREPARED TO SUBMIT DOCUMENTARY EVIDENCE TO SUPPORT THE SPECIFIC GROUNDS UPON REQUEST.

IF A HEARING IS DESIRED, IT SHOULD BE REQUESTED IN THE PETITION. THE REQUEST SHOULD SPECIFY WHETHER AN INFORMAL MEETING WITH A HEARING OFFICER AT THE NEAREST DISTRICT OFFICE OR A HEARING BEFORE THE BOARD IN SACRAMENTO.

300 000759

PLEASE RETURN THIS COPY WITH YOUR PAYMENT
ALWAYS WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK OR MONEY ORDER

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001

RE | PM

EFFECTIVE DATE OF PAYMENT — MO. DAY YEAR

IN REPLY REFER TO:

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE APRIL 26,1990.

ACCOUNT NUMBER HC RG 36-03483

NOTICE OF DETERMINATION

PAGE 2

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL

IS DESIRED. A 10 DAY NOTICE OF THE TIME AND PLACE OF HEARING WILL BE GIVEN.
THE FILING OF A PETITION WILL NOT PREVENT THE ACCRUAL OF INTEREST.
THE APPLICATION OF ADDITIONAL PENALTY REFERRED TO ABOVE WOULD BE DEFERRED
UNTIL 30 DAYS AFTER THE DATE OF A NOTICE OF REDETERMINATION.
PROMPT PAYMENT OF UNDISPUTED PORTIONS OF THE LIABILITY SHOULD BE MADE.
THIS WILL PREVENT ACCRUAL OF ADDITIONAL INTEREST THEREON AND WILL NOT IN
ANY WAY AFFECT THE PROTESTED PORTIONS.

300 000760

PLEASE RETURN THIS COPY WITH YOUR PAYMENT
ALWAYS WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK OR MONEY ORDER

BEST ORIGINAL

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

July 21, 1989

RECEIVED
JUL 24 1989

Irvine, California 92718

Attn: Gary Carlin

Dear Mr. Miller:

RECENTLY ACQUIRED PROPERTY OF COCA COLA ENTERPRISES IN THE CARSON-TORRANCE AREA OF THE CITY OF LOS ANGELES, CALIFORNIA AT 19875 PACIFIC GATEWAY DRIVE

We have completed our review of your letter report, hand delivered to this office on July 11, 1989 and have the following comments.

Your property lies about 1,300 feet north of the Del Amo Hazardous Waste Site. This site consists of waste disposal ponds and sumps that were used by a former synthetic rubber manufacturing complex. The types of wastes disposed in these ponds include volatile and semi-volatile organic substances such as benzene, styrene and naphthalene. It is believed that the complex covered the entire area bordered by 190th Street to the north, Del Amo Boulevard to the south, Normandie Avenue to the west, and Vermont Avenue and Hamilton Avenue to the east. Documents in our files indicate that there were manufacturing areas, underground and above ground tanks, underground lines, and possible sumps that may be sources of soil and ground water contamination. Soils and ground water beneath the Del Amo Site are contaminated by hazardous substances believed to have originated from the disposal ponds and sumps.

Because of the contaminant problems associated with the Del Amo disposal areas, we have referred the Site to the U.S. Environmental Protection Agency (EPA) for consideration for the National Priorities List. The Department of Health Services (DHS) Toxic Substances Control Division is also evaluating the entire area of the former rubber manufacturing complex as a source of ground water contamination. The high levels of napthalene and phenanthrene that you discovered at the subject location may be associated with the synthetic rubber manufacturing operations once conducted on your property because these same chemicals were also found at the Del Amo site. We suggest that you make a thorough historical search of your property to determine the types of past operations that may be causing the contamination. Should you have any plans to remediate the contamination on this property, this office would review those plans prior to proceeding.

If you have any questions, please contact Julia Bussey or Alice Gimeno at (213) 590-4856.

Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 380
LONG BEACH, CA 90802
(213) 590-4868

July 21, 1989

RECEIVED
JUL 24 1989

Mr. Michael J. Miller, P.E.
Stoney-Miller Consultants, Inc.
14 Hughes, Suite B-101
Irvine, California 92718

Attn: Gary Carlin

Dear Mr. Miller:

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Mr. Michael J. Miller, P.E.
Page 2
July 21, 1989

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Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

July 21, 1989

RECEIVED JUL 24 1989

Mr. Michael J. Miller, P.E.
Stoney-Miller Consultants, Inc.
14 Hughes, Suite B-101
Irvine, California 92718

Attn: Gary Carlin

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Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

HARGIS + ASSOCIATES, INC.
2223 Avenida De La Playa, Suite 300
La Jolla, California 92037
(619) 454-0165
Telecopier (619) 454-5839

David R. Hargis, Ph.D., R.G.
Michael R. Long, R.G.
Terry M. Turner, R.G.
Roger A. Niemeyer, R.G.
Leo S. Leonnem, Ph.D., R.G.
Lance J. Raymond
Peter T. Quinlan
Mary P. Jones, Ph.D., R.E.A
Timothy T. Jarvis, Ph.D., R.E.A.

HAVE — Let's discuss this MATT

July 18, 1989

VIA FEDERAL EXPRESS

Mr. Matt Fanoe
COCA-COLA ENTERPRISES
One Coca-Cola Plaza, CCE-819
Atlanta, GA 30301

Re: Request for Property Access to Install a Groundwater Test Well

Dear Mr. Fanoe:

In regards to our telephone conversation of July 14, 1989, the following is the request for access which I mentioned. Please review and forward it to the necessary personnel within your company.

Pursuant to an administrative order from the United States Environmental Protection Agency (EPA) issued to Montrose Chemical Corporation of California (Montrose), this letter is a request for access to the property shown as owned by Coca-Cola Bottling Company of Los Angeles, Torrance, California. The purpose of the requested access is to install and sample, on a regular basis, one groundwater monitor well. The well is part of a groundwater investigation conducted by Montrose and overseen by the EPA that presently includes approximately 60 existing and proposed monitor wells in the immediate area (Figure 1).

The monitoring well is proposed for the northwest portion of the Coca-Cola Bottling Company property located at 19899 Pacific Gateway Drive, in Torrance, California. The field work required under the order involves access for: 1) a small truck mounted hollow stem auger drill rig, operated by sub-contractors to Hargis + Associates, Inc.; 2) Hargis + Associates, Inc. field personnel; and 3) EPA oversight personnel. The initial field work should involve no more than one week, and is planned to commence in late August or early September of 1989. The name and address of the proposed drilling contractor is: Beylik Drilling, Inc., 591 South Walnut, La Habra, California 90631.

The site will be restored to as near its original condition as possible before the field crews leave the property. An example of the proposed surface completion for the monitor wells has been provided (Figure 2).

300 000767

Other Offices:
Tucson, Arizona
Phoenix, Arizona
Los Angeles, California

HARGIS + ASSOCIATES, INC.

Mr. Matt Fanoe
July 18, 1989
Page 2

Routine future access to the monitor well to collect groundwater samples will also be necessary. Coca-Cola Bottling Company will be given ample notice before any sampling activities take place.

Hargis + Associates, Inc. will telephone you later this week to confirm receipt of this letter and to further discuss this matter. If you have any questions in the interim, please contact Roger Niemeyer, Matthew Wiedlin, or myself. Hargis + Associates, Inc. looks forward to cooperating with you on with matter.

Sincerely,

HARGIS + ASSOCIATES, INC.

Matthew Wiedlin for

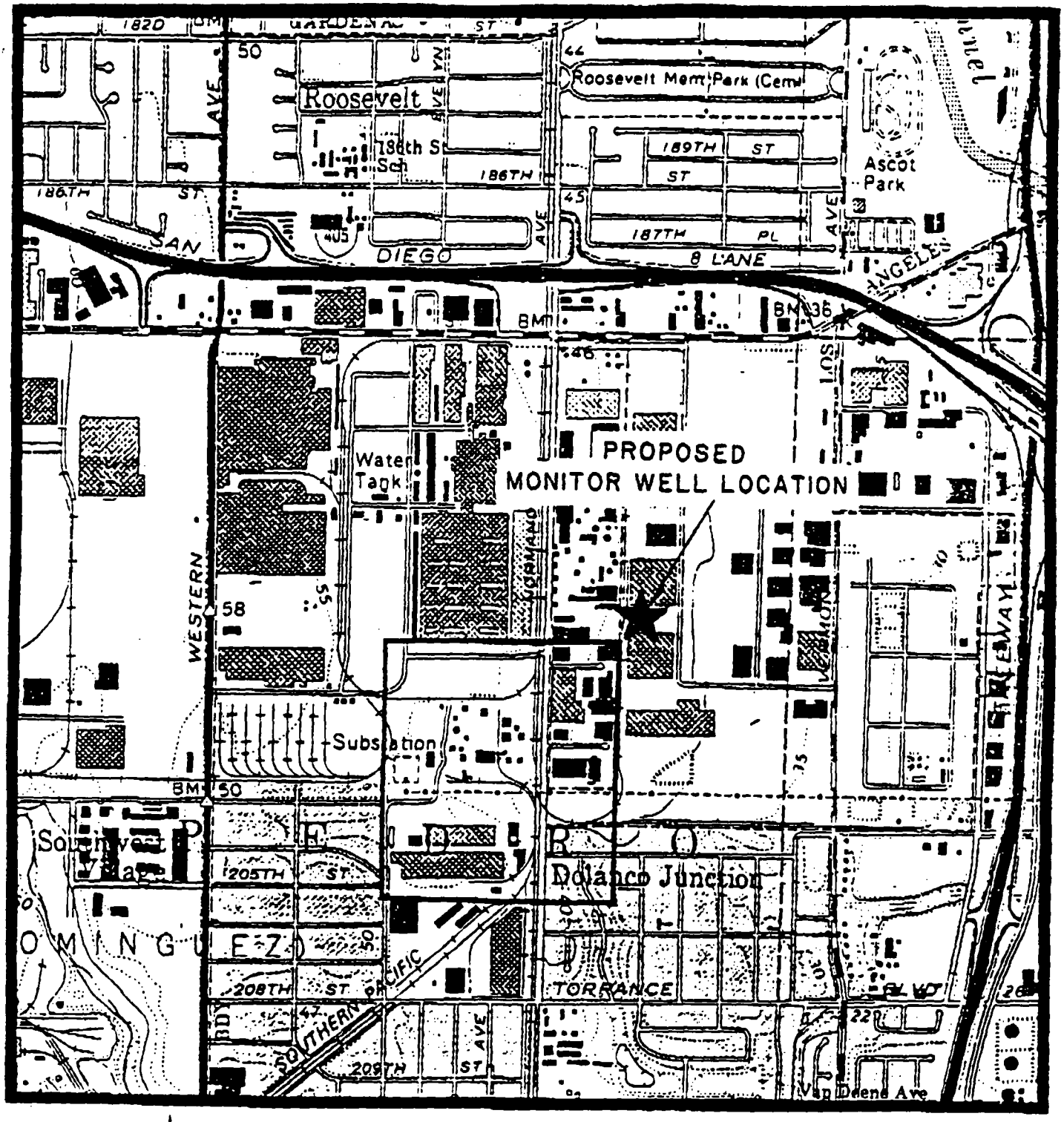
Rush N. Boynton
Hydrogeologist

RNB/elm

Enclosures

cc: Karl Lytz, Latham & Watkins
Dan Greeno, Montrose Chemical Co.
Johanna Miller, EPA Region IX

fanoe.ltr



0 1,000 2,000
FEET

300 000769

MONTROSE, CALIFORNIA
TORRANCE, CALIFORNIA

APPROXIMATE LOCATION
OF STUDY AREA

HARGIS + ASSOCIATES, INC.
Consultants in Hydrogeology
San Diego, California

7/89
FIGURE 1

PREPARED BY _____ REVIEWED BY _____

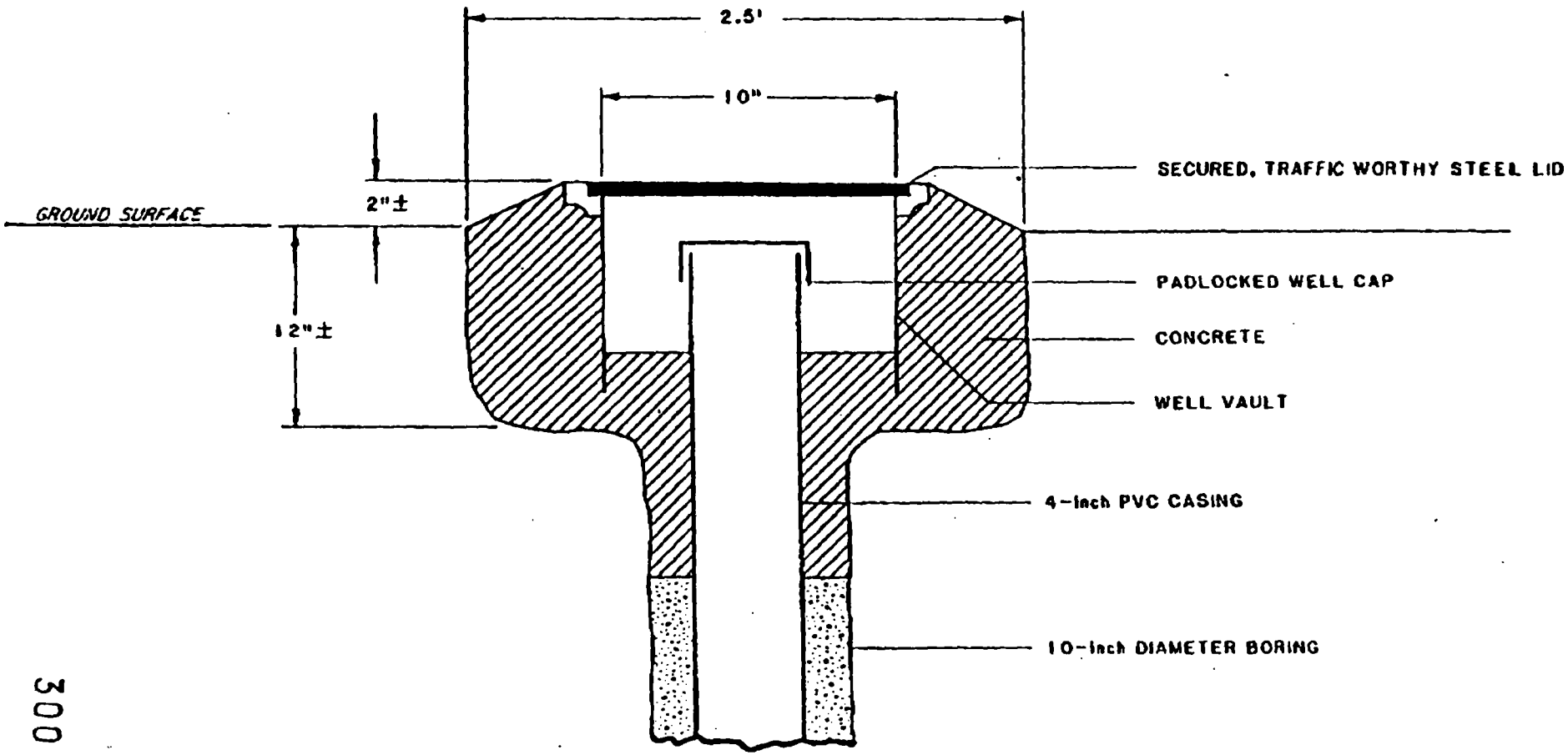


FIGURE 2. CROSS SECTIONAL VIEW OF MONITOR WELL COMPLETION

300 000770

USTEC U.S. Technical Environmental Consulting, Inc.

May 23, 1990

State Board of Equalization
Department of Business Taxes
1891 Alhambra Boulevard
Sacramento, California 95816

RE: PETITION FOR REDETERMINATION, ACCOUNT NO. HC HQ 36-034839, 19875 PACIFIC GATEWAY DRIVE, CARSON, CALIFORNIA. JOB NO. 89007.

Dear Sirs:

This letter serves as a Petition for an informal meeting with a hearing officer for a Redetermination in reference to the above stated account. This Petition is made on the basis that the activity on the site was wrongly determined by DOHS to be a Preliminary Endangerment Assessment. In reality, the limited activity performed was a Self-Certification action undertaken by the owners of the site, which is able to be performed without direct DOHS involvement.

The information submitted to DOHS was for notification of work to be performed on a site potentially involving hazardous waste. The results of the work performed showed that the materials in question were not hazardous with respect to Title 22 of the CAC, therefore DOHS involvement on the level of a Preliminary Endangerment Assessment is not justified.

Also for the record, please amend the name and address of the owner of the site to be:

Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021
Attn: Raul Ramirez
Telephone: 213-746-5555

300 000771

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

If you have any questions or comments, please contact the undersigned at (602) 829-6311.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Peter A. Beaver
Manager Remedial Services

Steven M. Myers, R.G.
President

/weh

cc: Raul Ramirez, CCE - West
Ed Todd, CCE - Atlanta
Steve McConnell, CCE - West

BT-1210 REV. 5 (12-86)

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001
(916) 739-2582

RE: PM:

EFFECTIVE DATE OF PAYMENT
MO. DAY YEAR

IN REPLY REFER TO:

EXCISE TAX (ACTIVITY FEE)

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE: APRIL 26, 1990

ACCOUNT NUMBER
HC HQ 36-0341

RECEIVED
APR 30 1990

NOTICE OF DETERMINATION

YOU ARE HEREBY NOTIFIED OF AN AMOUNT DUE FROM YOU PURSUANT TO THE HAZARDOUS SUBSTANCES TAX LAW (ACTIVITY FEE).

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL
AS ASSESSED 03/08/90-03/08/90	7500.00			7500.00
L--0000				
TOTAL	7500.00			[illegible]

[illegible] PAY THIS AMOUNT [illegible]

ADDITIONAL INTEREST [illegible]
DUE AT THE MODIFIED [illegible]
EACH MONTH, OR [illegible]

ADDITIONAL PENALTY [illegible]

THE ACTIVITY FEE INDICATED ABOVE HAS BEEN ASSESSED PURSUANT [illegible] 25347.6 OF THE HEALTH AND SAFETY CODE AND IS BASED UPON ACTIVITY PERFORMED BY THE DEPARTMENT OF HEALTH SERVICES.

THE ABOVE FEE IS BASED ON A PRELIMINARY ENDANGERMENT ASSESSMENT.

SITE : 19875 PACIFIC GATEWAY DRIVE

DOHS TRANSMITTAL NUMBER 90-4-12-SM

INFORMATION CONCERNING DETERMINATIONS

A PERSON AGAINST WHOM A DETERMINATION IS MADE OR ANY PERSON DIRECTLY INTERESTED MAY PETITION FOR REDETERMINATION WITH THE BOARD OF EQUALIZATION WITHIN 30 DAYS FROM THE DATE SHOWN AT THE TOP OF THIS NOTICE.

A PETITION MUST BE IN WRITING AND STATE THE SPECIFIC GROUNDS UPON WHICH IT IS FOUNDED. ANYONE FILING A PETITION SHOULD BE PREPARED TO SUBMIT DOCUMENTARY EVIDENCE TO SUPPORT THE SPECIFIC GROUNDS UPON REQUEST.

IF A HEARING IS DESIRED, IT SHOULD BE REQUESTED IN THE PETITION. THE REQUEST SHOULD SPECIFY WHETHER AN INFORMAL MEETING WITH A HEARING OFFICER AT THE NEAREST DISTRICT OFFICE OR A HEARING BEFORE THE BOARD IN SACRAMENTO

300 000773

PLEASE RETURN THIS COPY WITH YOUR PAYMENT
ALWAYS WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK OR MONEY ORDER

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001

RE: PM:

EFFECTIVE DATE OF PAYMENT—
MO. DAY YEAR

IN REPLY REFER TO:

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE APRIL 26,1990

ACCOUNT NUMBER
HC HQ 36-03483

NOTICE OF DETERMINATION

PAGE 2

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL

IS DESIRED. A 10 DAY NOTICE OF THE TIME AND PLACE OF HEARING WILL BE GIVEN.
THE FILING OF A PETITION WILL NOT PREVENT THE ACCRUAL OF INTEREST.
THE APPLICATION OF ADDITIONAL PENALTY REFERRED TO ABOVE WOULD BE DEFERRED
UNTIL 30 DAYS AFTER THE DATE OF A NOTICE OF REDETERMINATION.
PROMPT PAYMENT OF UNDISPUTED PORTIONS OF THE LIABILITY SHOULD BE MADE
THIS WILL PREVENT ACCRUAL OF ADDITIONAL INTEREST THEREON AND WILL NOT IN
ANY WAY AFFECT THE PROTESTED PORTIONS.

300-000774

PLEASE RETURN THIS COPY WITH YOUR PAYMENT
ALWAYS WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK OR MONEY ORDER

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: E X E M P T
Manifest Document No.: 0 0 0 0 6
2. Page 1 of 1

I 0/A

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: E X E M P T

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744

10. US EPA ID Number: C A D 9 8 1 4 5 8 4 6 6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0 0 2	D T	0 0 0 2 2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37888
GROSS 77,640
TARE 33,140
NET 44,500

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. [signature]

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Kenneth Cope
Signature: Kenneth Cope
Month 06 Day 28 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space
300 000692

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month 6 Day 28 Year 90

GENERATOR / TRANSPORTER / FACILITY

ORIGINAL — RETURN TO GENERATOR

Please print or type
(Form designed for use on elite (12-pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 000 05
2. Page 1 of 1
05

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37866
GROSS 82,320
TARE 33,140
NET 49180
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. X [signature]

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: KENNETH COPE
Signature: Kenneth Cope
Month Day Year: 06 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000693

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 06 28 90

ORIGINAL — RETURN TO GENERATOR

0639-02391

[redacted]

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. .E.X.E.M.P.T. . . . . Manifest Document No. 0 0 0 0 4

2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name
W. A. WOODS INDUSTRIES, INC.

6. US EPA ID Number .E.X.E.M.P.T. . . . . .

7. Transporter 2 Company Name

8. US EPA ID Number . . . . . .

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744

10. US EPA ID Number C.A.D.9.8.1.4.5.8.4.6.6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0 0 2	D T	0 0 0 2 2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37846
GROSS 80,560
TARE 33,140
NET 47,420

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Kenneth Cope	Kenneth Cope	06	28	90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space
300 000694

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
William Cates	William Cates			

ORIGINAL — RETURN TO GENERATOR

[redacted]

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. .E.X.E.M.P.T.
Manifest Document No. 0.0.0.0.1
2. Page 1 of 1
#01

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name
W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number .E.X.E.M.P.T.

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number C.A.D.9.8.1.4.5.8.4.6.6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0·0·1	D·T	0·0·0·2·2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37883 76740
GROSS 31480
TARE 45260
NET
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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GENERATOR

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sollars
Signature: Brian Sollars
Month Day Year: 10 12 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 10 12 89

FACILITY

19. Discrepancy Indication Space
300 000695

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 10 12 89

ORIGINAL — RETURN TO GENERATOR

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. .E.X.E.M.P.T.
Manifest Document No. 0.0.0.0.2
2. Page 1 of 1
#02

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name
W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number .E.X.E.M.P.T.

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number C.A.D.9.8.1.4.5.8.4.6.6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0.0.1	D.T	0.0.0.2.2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37864
GROSS 74600
TARE 31480
NET 43120

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sollars
Signature: Brian Sollars
Month Day Year: 6 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space
300 000696

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 6 28 90

ORIGINAL — RETURN TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 0 0 0 0 3
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	001	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37847
GROSS 68920
TARE 31480
NET 37440
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sollars
Signature: Brian Sollars
Month Day Year: 10 6 2 89 0

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000697

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 10 6 89 0

ORIGINAL — RETURN TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 0 0 0 19
2. Page 1 of 1
#19

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	001	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37908
GROSS 76,260#
TARE 31,480#
NET 44,780#
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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Signature: Robert Byd

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sollars
Signature: Brian Sollars
Month 06 Day 28 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

FACILITY

19. Discrepancy Indication Space
300 000698

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month 06 Day 28 Year 90

ORIGINAL — RETURN TO GENERATOR

Please print or [illegible]
(Form designed [illegible])

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 00021
2. Page 1 of 1
#21

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	001	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
37898
SCALE TICKET # 80380
GROSS 31480
TARE 48900
NET

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sollars
Signature: Brian Sollars
Month Day Year: 06 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space
300 000699

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 6 12 89

GENERATOR
TRANSPORTER
FACILITY

ORIGINAL — RETURN TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 0008
2. Page 1 of 1
#08

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37887
GROSS 81500
TARE 32980
NET 48520
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MARK Faye
Signature: Mark Faye
Month 06 Day 28 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

FACILITY

19. Discrepancy Indication Space
300 000700

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month 06 Day 28 Year 90

ORIGINAL — RETURN TO GENERATOR

Rev. 0/88

Please print or Form designed

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: E·X·E·M·P·T
Manifest Document No.: 0·0·0·0·7
2. Page 1 of 1

1/07

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: E·X·E·M·P·T

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744

10. US EPA ID Number: C·A·D·9·8·1·4·5·8·4·6·6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0·0·2	D·T	0·0·0·2·2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37865
GROSS 84840
TARE 32990
NET 51860

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MARK Fry
Signature: Mark Fry
Month Day Year: 0[illegible] 2[illegible] 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space

300 000701

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 6 2[illegible] 9[illegible]

GENERATOR

TRANSPORTER

FACILITY

ORIGINAL — RETURN TO GENERATOR

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 0 0 0 0 9
2. Page 1 of 1

01

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37845
GROSS 79890
TARE 32980
NET 46900

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Mark Frye
Signature: Mark Frye
Month Day Year: 06 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000702

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 06 28 90

ORIGINAL — RETURN TO GENERATOR

Please print or type (Form designed for use on

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 000010
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37901
GROSS 74640
TARE 32980
NET 41660
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MARK Frye
Signature: Mark Frye
Month 06 Day 28 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

FACILITY

19. Discrepancy Indication Space
300 000703

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month 6 Day 28 Year 90

ORIGINAL — RETURN TO GENERATOR

WEIGHMASTER CERTIFICATE
IIS IS TO CERTIFY that the following described commodity was weighed, easured, or counted by a weighmaster, whose signature is on this certificate, no is a recognized authority of accuracy, as prescribed by Chapter 7 ommencing with Section 12700) of Division 5 of the California Business and ofessions Code, administered by the Division of Measurement Standards of the alifornia Department of Food and Agriculture.

No. 37883

SEQU NO 10451
WEIGHT 76740 LB
TIME 10:51 AM
DATE 6/28/90

31480 lbs tare
45260 lb net

Bin # 01
Bunt Petroleum

CHARGE FEE
CASH FEE
COD

DRIVER X Brian Sollars #110

WEIGHMASTER
WEIGHED BY **ASBURY TRANSPORTATION CO.**
COMMODITY Fuel Heating Oil
GROSS 6/28/90
BY DEPUTY DATE
TARE 6/28/90
BY DEPUTY DATE
CARRIER

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
1K07706	1H15790	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Co
DELIVERED TO Bunt Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

300

CUSTOMER COPY

WEIGHMASTER CERTIFICATE
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No. 37864

SEQU NO 10426
WEIGHT 74600 LB
TIME 9:30 AM
DATE 6/28/90

31480 lb tare
43120 lb net

Bin # 02
Bunt Petroleum

CHARGE FEE
CASH FEE
COD

DRIVER X Brian Sollars #110

WEIGHMASTER
WEIGHED BY **ASBURY TRANSPORTATION CO.**
COMMODITY Fuel Heating Oil
GROSS 6/28/90
BY DEPUTY DATE
TARE 6/28/90
BY DEPUTY DATE
CARRIER

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
1K07706	1H15790	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Co
DELIVERED TO Bunt Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

000704

CUSTOMER COPY

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No. 37847

SEQU NO 10384
WEIGHT 68920 LB
TIME 7:56 AM
DATE 6/28/90

SEQU NO 10403
WEIGHT 31480 LB
TIME 8:35 AM
DATE 6/28/90

37440 Net

Dr # 23

Brent Litteton

ARGE FEE — CASH FEE X

VER Brian Sollars — # 110

WEIGHMASTER

IGHED BY **ASBURY TRANSPORTATION CO.**

MMODITY Wet Non-Haz (1)

OSS 6/28/90

RE DEPUTY DATE 6/28/90

RRIER Sollars DEPUTY DATE

CTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
KC7116	1411579D	—	1150 No. Alameda Wilmington, CA 90744

GHED FOR Cargill Co.

IVERED TO Brent Litteton

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

300

CUSTOMER COPY

WEIGHMASTER CERTIFICATE

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No. 37908

SEQU NO 10506
WEIGHT 76260 LB
TIME 1:53 PM
DATE 6/28/90

31480 lbs

44780 lb Net

Dr # 19

Brent Litteton

CHARGE FEE — CASH FEE X

DRIVER X Brian Sollars — # 110

WEIGHMASTER

WEIGHED BY **ASBURY TRANSPORTATION CO.**

COMMODITY Wet Non-Haz (1)

GROSS 6/28/90

BY DEPUTY DATE

TARE 6/28/90

BY DEPUTY DATE

CARRIER Sollars WH Wood

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
KC7116	1411579D	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Cargill Co.

DELIVERED TO Brent Litteton

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

000705

CUSTOMER COPY

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No. 37898

SEQU NO 10481
WEIGHT 80380 LB
TIME 12:26 PM
DATE 6/28/90

31480 lbs
48900 lb net

Bk #21

Brent Petroleum

CHARGE FEE 600 ~~CASH FEE~~ #

DRIVER X Brian Sullivan 110

WEIGHMASTER

WEIGHED BY ASBURY TRANSPORTATION CO.

COMMODITY Dirt Non-Haz ①

GROSS X E. Bryan 6/28/90
BY DEPUTY DATE

TARE X E. Bryan 6/28/90
BY DEPUTY DATE

CARRIER Yellow Wt Wood

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
11-07706	11115790	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Co

DELIVERED TO Brent Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

300 000706

CUSTOMER COPY

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No. 37887

SEQU NO 10454
WEIGHT 81500 LB
TIME 11:02 AM
DATE 6/28/90

32980 lb Tare
48520 lb net

Bk #08

Brent Petroleum

CHARGE FEE 600 ~~CASH FEE~~ #

DRIVER X Mark 113

WEIGHMASTER

WEIGHED BY ASBURY TRANSPORTATION CO.

COMMODITY Dirt Non-Haz ②

GROSS X E. Bryan 6/28/90
BY DEPUTY DATE

TARE X E. Bryan 6/28/90
BY DEPUTY DATE

CARRIER Wt Wood

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
HP 18913	12731178	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Co

DELIVERED TO Brent Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

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No. 37865

SEQU NO 10427
WEIGHT 84840 LB
TIME 9:32 AM
DATE 6/28/90

Gm

32980 lb Tare

51860 lb net

Ck # 07

HARGE FEE

CASH FEE

RIVER X Mark

#113

WEIGHMASTER

/EIGHED BY **ASBURY TRANSPORTATION CO.**

OMMODITY Kraft Mac Nut Hay (2)

ROSS [illegible] 6/28/90
BY DEPUTY DATE

ARE [illegible] 6/28/90
BY DEPUTY DATE

ARRIER [illegible]

RACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
1178 13	BT31178	—	1150 No. Alameda Wilmington, CA 90744

/EIGHED FOR Carson Co

ELIVERED TO Mount Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

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No. 37845

SEQU NO 10382
WEIGHT 79880 LB
TIME 7:51 AM
DATE 6/28/90

SEQU NO 10404
WEIGHT 32980 LB
TIME 8:37 AM
DATE 6/28/90

Ck # 09 46900 lb net

CHARGE FEE

CASH FEE

DRIVER Mark

#113

WEIGHMASTER

WEIGHED BY **ASBURY TRANSPORTATION CO.**

COMMODITY Kraft Mac Nut Hay (2)

GROSS [illegible] 6/28/90
BY DEPUTY DATE

TARE [illegible] 6/28/90
BY DEPUTY DATE

CARRIER [illegible]

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
1178 13	BT31178	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Co

DELIVERED TO Mount Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

300 000707

WEIGHMASTER CERTIFICATE

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No. 37901

SEQU NO 10489
WEIGHT 74640 LB
TIME 12:49 PM
DATE 6/28/90

32980 lb Tare

41660 lb Net

Bk #10

Brent Petroleum

CHARGE FEE 600 ~~CASH FEE~~ #

RIVER X Mark 113

WEIGHMASTER

WEIGHED BY **ASBURY TRANSPORTATION CO.**

COMMODITY Dirt Non Haz (2)

GROSS BY [signature] DEPUTY DATE 6/28/90

TARE BY [signature] DEPUTY DATE 6/28/90

CARRIER W H Wood

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
117898	DT13178	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Ca

DELIVERED TO Brent Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

300 000708

WEIGHMASTER CERTIFICATE

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No. 37914

SEQU NO 10510
WEIGHT 79580 LB
TIME 2:13 PM
DATE 6/28/90

33140 lb
46440 lb Net

Bk #11

Brent Petroleum

CHARGE FEE 600 ~~CASH FEE~~ #

DRIVER X Kenneth Cope 111

WEIGHMASTER

WEIGHED BY **ASBURY TRANSPORTATION CO.**

COMMODITY Dirt Non Haz (2)

GROSS BY [signature] DEPUTY DATE 6/28/90

TARE BY [signature] DEPUTY DATE 6/28/90

CARRIER W H Wood

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
117012	DT11828-9	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Ca

DELIVERED TO Brent Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

WEIGHMASTER CERTIFICATE

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No. 37846

SEQU NO 10383
WEIGHT 80560 LB
TIME 7:53 AM
DATE 6/28/90

SEQU NO 10405
WEIGHT 33140 LB
TIME 8:38 AM
DATE 6/28/90

1st 04 41420 lb Net

CHARGE FEE
CASH FEE
COD
DRIVER Kenneth Cope #

WEIGHMASTER
EIGHED BY **ASBURY TRANSPORTATION CO.**
OMMODITY Dust Mix Slag (2)
ROSS 6/28/90
BY DEPUTY DATE
ARE 6/28/90
BY DEPUTY DATE
ARRIER

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
17012G	BT18289	—	1150 No. Alameda Wilmington, CA 90744

EIGHED FOR Carrow Co
ELIVERED TO Dust Mitigation

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

WEIGHMASTER CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

No. 37866

SEQU NO 10429
WEIGHT 82320 LB
TIME 9:37 AM
DATE 6/28/90

33140 lb
49180 lb Net

Dn #05
Dust Mitigation

CHARGE FEE
CASH FEE
COD
DRIVER Kenneth Cope #111

WEIGHMASTER
WEIGHED BY **ASBURY TRANSPORTATION CO.**
COMMODITY Dust Mix Slag (2)
GROSS 6/28/90
BY DEPUTY DATE
TARE 6/28/90
BY DEPUTY DATE
CARRIER

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
17012G	BT18289	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carrow Co
DELIVERED TO Dust Mitigation

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

300 000709

WEIGHMASTER CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

No. 37900

SEQU NO 10488
WEIGHT 81520 LB
TIME 12:44 PM
DATE 6/28/90

3314011
H8380 IB 4/07

BK# 20
Dirt/Petroleum

CHARGE FEE 100 | CASH FEE ~~X~~ | #

DRIVER X Kenneth Cox 111

WEIGHMASTER

WEIGHED BY **ASBURY TRANSPORTATION CO.**

COMMODITY Dirt/Non-Haz (2)

GROSS BY T.B. Burnam DEPUTY 6/28/90 DATE

TARE BY T.B. Burnam DEPUTY 6/28/90 DATE

CARRIER W H Wood

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
H70126	5T18289	—	1150 No. Alameda Wilmington, CA 90744

WEIGHED FOR Carson Co

DELIVERED TO Dirt Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

WEIGHMASTER CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

No. 37888

SEQU NO 10455
WEIGHT 77640 LB
TIME 11:04 AM
DATE 6/28/90

3314011 Tare
H4500 IB 4/07

BK# 06
Dirt/Petroleum

CHARGE FEE 100 | CASH FEE ~~X~~ | #

DRIVER X Kenneth Cox 111

WEIGHMASTER

WEIGHED BY **ASBURY TRANSPORTATION CO.**

COMMODITY Dirt/Non-Haz

GROSS BY T.B. Burnam DEPUTY 6/28/ DATE

TARE BY T.B. Burnam DEPUTY 6/28/ DATE

CARRIER W H Wood

TRACTOR LIC.	TRAILER LIC.	TRAILER LIC.	WEIGHED AT
H70126	5T18289	—	1150 No. Alamed Wilmington, CA 90

WEIGHED FOR Carson Co

DELIVERED TO Dirt Petroleum

ASBURY TRANSPORTATION CO.
1635 EAST DENNI STREET
WILMINGTON, CA 90744
(213) 834-2881 • (213) 775-2904

CUSTOMER COPY

300 000710

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: E.X.E.M.P.T.
Manifest Document No.: 0.0.0.0.1
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: E.X.E.M.P.T.

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: C A D.9.8.1.4.5.8.4.6.6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0.0.1	D.T	0.0.0.2.2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 76740
GROSS 31480
TARE 45260
NET

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sollars
Signature: Brian Sollars
Month Day Year: 06 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000711

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cotter
Signature: William Cotter
Month Day Year: 6 27 90

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. E.X.E.M.P.T.
Manifest Document No. 0.0.0.0.2
2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name
W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number E.X.E.M.P.T.

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number C A D. 9. 8. 1. 4. 5. 8. 4. 6. 6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0·0·	D·T	0·0·0·2·2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37864
GROSS 74600
TARE 31480
NET 43120

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

FACILITY

19. Discrepancy Indication Space
300 000712

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Month | Day | Year

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 0 0 0 0 3
2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	001	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37847
GROSS 68920
TARE 31480
NET 37440
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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GENERATOR

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sollars
Signature: Brian Sollars
Month Day Year: 06 12 96

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000713

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 6 12 96

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. E.X.E.M.P.T.	Manifest Document No. 0.0.0.0.4	2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name	6. US EPA ID Number
W. A. WOODS INDUSTRIES, INC.	E.X.E.M.P.T.
7. Transporter 2 Company Name	8. US EPA ID Number

9. Designated Facility Name and Site Address	10. US EPA ID Number	
BRENT PETROLEUM CORPORATION 1008 CERVERA WILMINGTON, CA 90744	C A D.9.8.1.4.5.8.4.6.6	A. Transporter's Phone (213) 927-1367 B. Transporter's Phone C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0.0.2	D.T	0.0.0.2.2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above	E. Handling Codes for Wastes Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL	ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information

SCALE TICKET # 37846
GROSS 80,560
TARE 33,140
NET 47,420

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Kenneth Cope	Kenneth Cope	2	28	90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

300 000714

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
William Cutter	William Cutter	6	28	89

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. EXEMPT	Manifest Document No. 000 05	2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name	6. US EPA ID Number
W. A. WOODS INDUSTRIES, INC.	EXEMPT
7. Transporter 2 Company Name	8. US EPA ID Number

9. Designated Facility Name and Site Address	10. US EPA ID Number	
BRENT PETROLEUM CORPORATION 1008 CERVERA WILMINGTON, CA 90744	CAD981458466	A. Transporter's Phone (213) 927-1367 B. Transporter's Phone C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above	E. Handling Codes for Wastes Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL	ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information

SCALE TICKET # 37866
GROSS 82,320
TARE 33,140
NET 49180

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
KENNETH COPE	Kenneth Cope	6	28	90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

300 000715

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
		6	28	90

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. E X E M P T	Manifest Document No. 0 0 0 0 6	2. Page 1 of 1	1 of

3. Generator's Name and Mailing Address

COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name	6. US EPA ID Number
W. A. WOODS INDUSTRIES, INC.	E X E M P T
7. Transporter 2 Company Name	8. US EPA ID Number

9. Designated Facility Name and Site Address	10. US EPA ID Number	
BRENT PETROLEUM CORPORATION 1008 CERVERA WILMINGTON, CA 90744	C A D 9 8 1 4 5 8 4 6 6	A. Transporter's Phone (213) 927-1367 B. Transporter's Phone C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0 0 2	D T	0 0 0 2 2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above	E. Handling Codes for Wastes Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL	ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information

SCALE TICKET # 37888
GROSS 77640
TARE -33140
NET 44500

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials		
Printed/Typed Name: Kenneth Cox	Signature: Kenneth Cox	Month 05 Day 20 Year 93
18. Transporter 2 Acknowledgement of Receipt of Materials		
Printed/Typed Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space

300 000716

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 0 0 0 0 7
2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37865
GROSS [illegible]
TARE [illegible]
NET [illegible]
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MARK Frye
Signature: [signature]
Month 10 Day 26 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

FACILITY

19. Discrepancy Indication Space
300 000717

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible]
Signature: [signature]
Month 10 Day 26 Year 90

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. R X E M P T

Manifest Document No. 0 0 0 0 8

2. Page 1 of 1

3. Generator's Name and Mailing Address

COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.

6. US EPA ID Number: R X E M P T

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744

10. US EPA ID Number: C A D 9 8 1 4 5 8 4 6 6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information

SCALE TICKET # 37887
GROSS 81500
TARE 32940
NET 48520

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: [illegible] Signature: [illegible] Month 02 Day 28 Year 90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month | Day | Year

FACILITY

19. Discrepancy Indication Space

300 000718

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: William Cates Signature: [illegible] Month | Day | Year

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. EXEMPT	Manifest Document No. 000 09	2. Page 1 of 1	01

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name	6. US EPA ID Number
W. A. WOODS INDUSTRIES, INC.	EXEMPT
7. Transporter 2 Company Name	8. US EPA ID Number

9. Designated Facility Name and Site Address	10. US EPA ID Number	
BRENT PETROLEUM CORPORATION 1008 CERVERA WILMINGTON, CA 90744	CAD981458466	A. Transporter's Phone (213) 927-1367 B. Transporter's Phone C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37845
GROSS 74,180
TARE [illegible]
NET [illegible]

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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[signature]

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Mark Frye	[signature]	06	28	90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

300 000719

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
William Cates	[signature]	6	28	90

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. EXEMPT	Manifest Document No. 000 10	2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744

10. US EPA ID Number: CAD981458466

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	002	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information

SCALE TICKET # 37401
GROSS 74640
TARE 32980
NET [illegible]

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible] Fire	Mark [illegible]	06	25	70

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

300 000720

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
William Cate	William Cate	6	28	70

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: E X E M P T
Manifest Document No.: 0 0 0 2 0
2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247
4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: E X E M P T

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: C A D 9 8 1 4 5 8 4 6 6

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	0 0 2	D T	0 0 0 2 2	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 37900
GROSS 81,520
TARE 33,140
NET 48,380

GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Kenneth Cone
Signature: Kenneth Cone
Month Day Year: 6 6 8 9

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000721

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 5 6 89

TRANSPORTER #2

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: EXEMPT
Manifest Document No.: 00021
2. Page 1 of 1

3. Generator's Name and Mailing Address
COCA COLA ENTERPRISES WEST
19875 PACIFIC GATEWAY DRIVE, CARSON, CA 90247

4. Generator's Phone (213) 323-4991

5. Transporter 1 Company Name: W. A. WOODS INDUSTRIES, INC.
6. US EPA ID Number: EXEMPT

7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address
BRENT PETROLEUM CORPORATION
1008 CERVERA
WILMINGTON, CA 90744
10. US EPA ID Number: CAD981458666

A. Transporter's Phone (213) 927-1367
B. Transporter's Phone
C. Facility's Phone (213) 830-9459

GENERATOR

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol
a. CALIFORNIA REGULATED WASTE ONLY	001	DT	00022	T
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
SOIL CONTAMINATED WITH TRACE AMOUNTS OF WASTE OIL

E. Handling Codes for Wastes Listed Above
ACCEPTANCE # TM 238-S

15. Special Handling Instructions and Additional Information
SCALE TICKET # 80380
GROSS 31480
TARE 48900
NET
GLOVES & GOGGLES
EMERGENCY RESPONSE GUIDE #31

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TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Brian Sullivan
Signature: Brian Sullivan
Month Day Year: 06 28 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space
300 000722

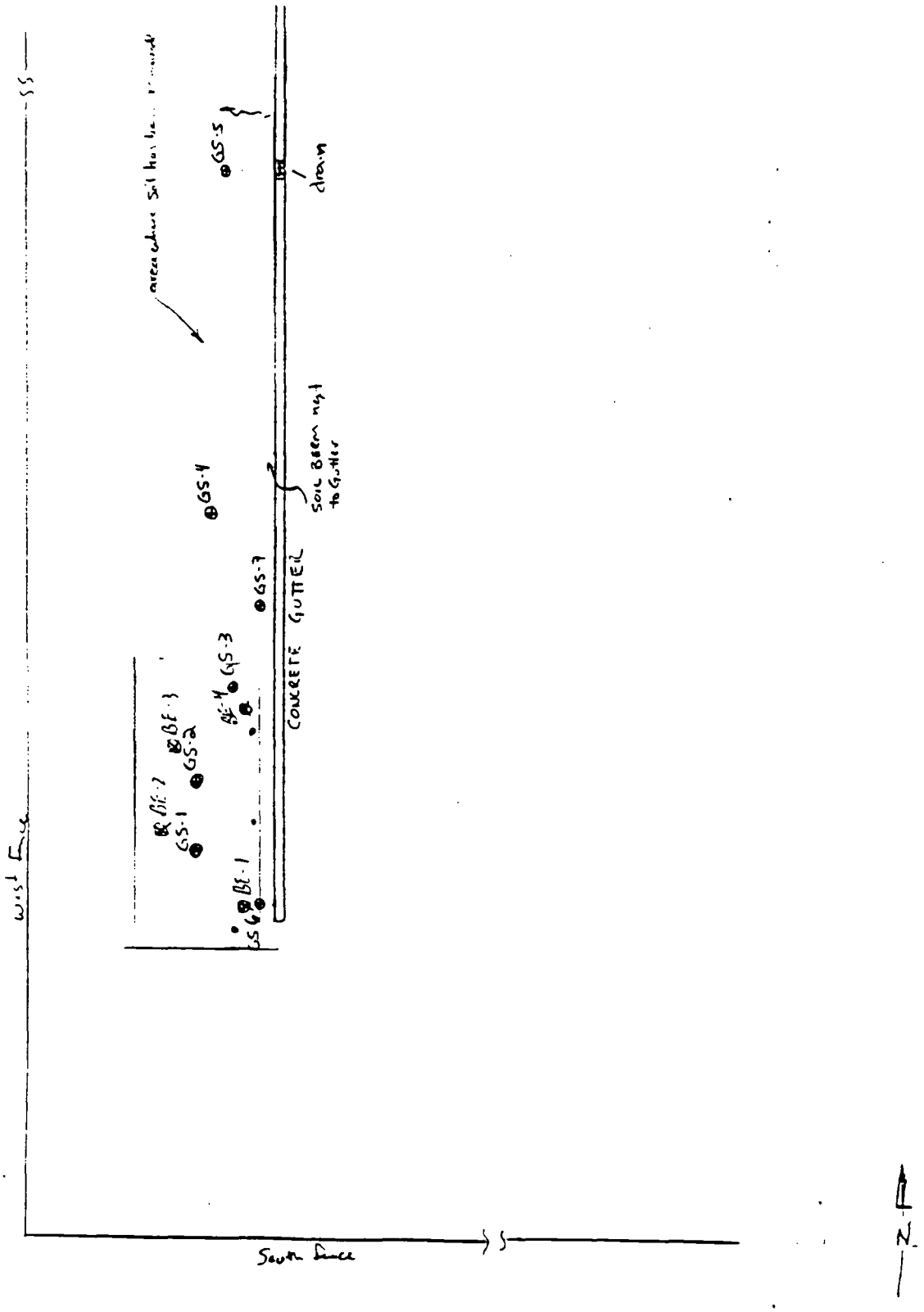
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: William Cates
Signature: William Cates
Month Day Year: 6 1 7 90

TRANSPORTER #2

Carson (Torrence) - Ca
Coca-Cola

1" = 50'

89007
2



300 000723

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

July 21, 1989

RECEIVED
JUL 24 1989

Irvine, California 92718

Attn: Gary Carlin

Dear Mr. Miller:

RECENTLY ACQUIRED PROPERTY OF COCA COLA ENTERPRISES IN THE CARSON-TORRANCE AREA OF THE CITY OF LOS ANGELES, CALIFORNIA AT 19875 PACIFIC GATEWAY DRIVE

We have completed our review of your letter report, hand delivered to this office on July 11, 1989 and have the following comments.

Your property lies about 1,300 feet north of the Del Amo Hazardous Waste Site. This site consists of waste disposal ponds and sumps that were used by a former synthetic rubber manufacturing complex. The types of wastes disposed in these ponds include volatile and semi-volatile organic substances such as benzene, styrene and naphthalene. It is believed that the complex covered the entire area bordered by 190th Street to the north, Del Amo Boulevard to the south, Normandie Avenue to the west, and Vermont Avenue and Hamilton Avenue to the east. Documents in our files indicate that there were manufacturing areas, underground and above ground tanks, underground lines, and possible sumps that may be sources of soil and ground water contamination. Soils and ground water beneath the Del Amo Site are contaminated by hazardous substances believed to have originated from the disposal ponds and sumps.

Because of the contaminant problems associated with the Del Amo disposal areas, we have referred the Site to the U.S. Environmental Protection Agency (EPA) for consideration for the National Priorities List. The Department of Health Services (DHS) Toxic Substances Control Division is also evaluating the entire area of the former rubber manufacturing complex as a source of ground water contamination. The high levels of napthalene and phenanthrene that you discovered at the subject location may be associated with the synthetic rubber manufacturing operations once conducted on your property because these same chemicals were also found at the Del Amo site. We suggest that you make a thorough historical search of your property to determine the types of past operations that may be causing the contamination. Should you have any plans to remediate the contamination on this property, this office would review those plans prior to proceeding.

If you have any questions, please contact Julia Bussey or Alice Gimeno at (213) 590-4856.

Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90502
(213) 590-4868

July 21, 1989

RECEIVED
JUL 24 1989

Mr. Michael J. Miller, P.E.
Stoney-Miller Consultants, Inc.
14 Hughes, Suite B-101
Irvine, California 92718

Attn: Gary Carlin

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Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

July 21, 1989

RECEIVED
JUL 24 1989

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14 Hughes, Suite B-101
Irvine, California 92718

Attn: Gary Carlin

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Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

HARGIS + ASSOCIATES, INC.
2223 Avenida De La Playa, Suite 300
La Jolla, California 92037
(619) 454-0165
Telecopier (619) 454-5839

David R. Hargis, Ph.D., R.G.
Michael R. Long, R.G.
Terry M. Turner, R.G.
Roger A. Niemeyer, R.G.
Leo S. Leonnem, Ph.D., R.G.
Lonoe J. Raymond
Peter T. Quinlan
Mary F. Jones, Ph.D., R.E.A
Timothy T. Jarvis, Ph.D., R.E.A.

HAVE — Let's discuss this MATT

July 18, 1989

VIA FEDERAL EXPRESS

Mr. Matt Fanoe
COCA-COLA ENTERPRISES
One Coca-Cola Plaza, CCE-819
Atlanta, GA 30301

Re: Request for Property Access to Install a Groundwater Test Well

Dear Mr. Fanoe:

In regards to our telephone conversation of July 14, 1989, the following is the request for access which I mentioned. Please review and forward it to the necessary personnel within your company.

Pursuant to an administrative order from the United States Environmental Protection Agency (EPA) issued to Montrose Chemical Corporation of California (Montrose), this letter is a request for access to the property shown as owned by Coca-Cola Bottling Company of Los Angeles, Torrance, California. The purpose of the requested access is to install and sample, on a regular basis, one groundwater monitor well. The well is part of a groundwater investigation conducted by Montrose and overseen by the EPA that presently includes approximately 60 existing and proposed monitor wells in the immediate area (Figure 1).

The monitoring well is proposed for the northwest portion of the Coca-Cola Bottling Company property located at 19899 Pacific Gateway Drive, in Torrance, California. The field work required under the order involves access for: 1) a small truck mounted hollow stem auger drill rig, operated by sub-contractors to Hargis + Associates, Inc.; 2) Hargis + Associates, Inc. field personnel; and 3) EPA oversight personnel. The initial field work should involve no more than one week, and is planned to commence in late August or early September of 1989. The name and address of the proposed drilling contractor is: Beylik Drilling, Inc., 591 South Walnut, La Habra, California 90631.

The site will be restored to as near its original condition as possible before the field crews leave the property. An example of the proposed surface completion for the monitor wells has been provided (Figure 2).

Other Offices:
Tucson, Arizona
Phoenix, Arizona
Los Angeles, California

HARGIS + ASSOCIATES, INC.

Mr. Matt Fanoe
July 18, 1989
Page 2

Routine future access to the monitor well to collect groundwater samples will also be necessary. Coca-Cola Bottling Company will be given ample notice before any sampling activities take place.

Hargis + Associates, Inc. will telephone you later this week to confirm receipt of this letter and to further discuss this matter. If you have any questions in the interim, please contact Roger Niemeyer, Matthew Wiedlin, or myself. Hargis + Associates, Inc. looks forward to cooperating with you on with matter.

Sincerely,

HARGIS + ASSOCIATES, INC.

Matthew Wiedlin for

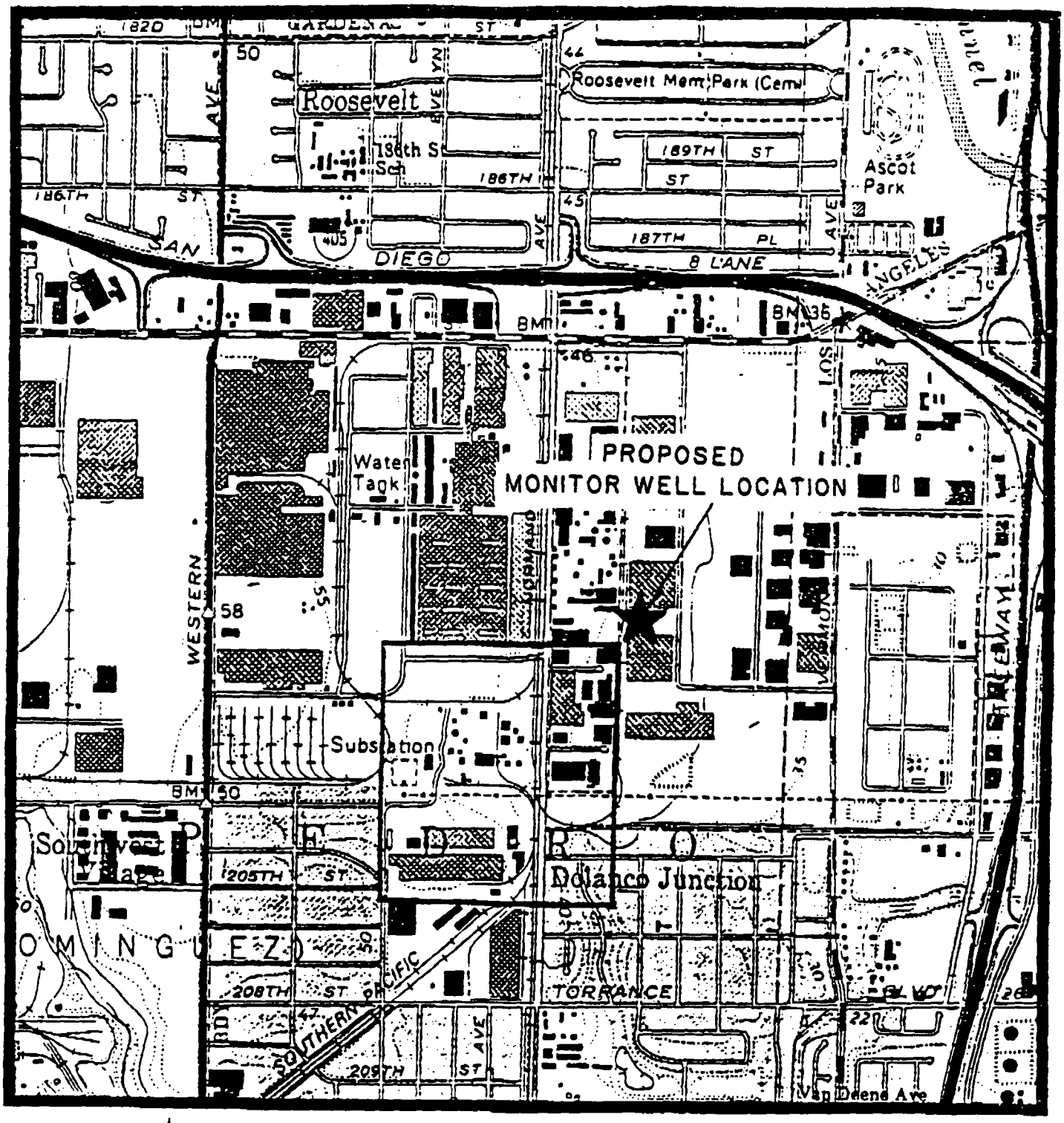
Rush N. Boynton
Hydrogeologist

RNB/elm

Enclosures

cc: Karl Lytz, Latham & Watkins
Dan Greeno, Montrose Chemical Co.
Johanna Miller, EPA Region IX

fanoe.ltr



0 1,000 2,000
FEET

300 000732

MONTROSE, CALIFORNIA
TORRANCE, CALIFORNIA

APPROXIMATE LOCATION
OF STUDY AREA

HARGIS + ASSOCIATES, INC.
Consultants in Hydrogeology
San Diego, California

7/89
FIGURE 1

PREPARED BY _____ REVIEWED BY _____

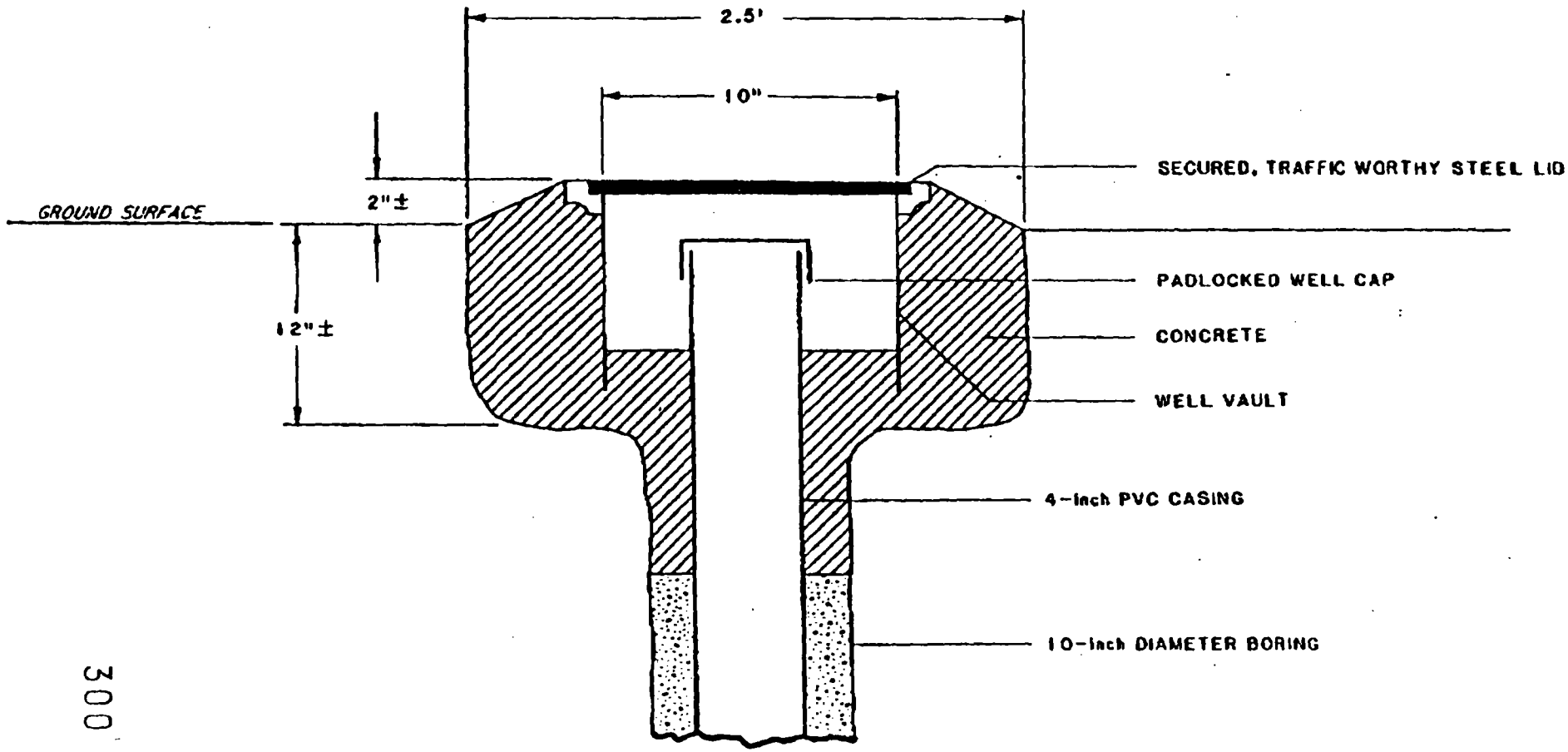


FIGURE 2. CROSS SECTIONAL VIEW OF MONITOR WELL COMPLETION

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

January 29, 1990

Mr. Peter Beaver
Senior Project Manager
Coca Cola Enterprises - West/U.S. Technical
Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150
Tempe, AZ 85282

Dear Mr. Beaver:

ACTIVITY FEE PROGRAM

By your letter of December 11, 1989 to the Department of Health Services (Department) you have identified your client, Coca Cola Enterprises - West, as the party primarily responsible for taking action to characterize and remedy any public health and/or environmental threats posed by any uncontrolled releases of hazardous substances at 19875 Pacific Gateway Drive in Carson, CA. Pursuant to legislation (Chapter 269, Statutes of 1989) which was recently signed into law by the Governor, you are obligated to pay activity fees to partially cover the Department's cost of evaluating and overseeing your actions to characterize and satisfactorily remediate this site. This includes the evaluation of the site assessment report you submitted and providing you with recommendations for future remedial actions.

Chapter 269 sets out specific fees for the various phases of activity associated with characterizing and abating hazardous substance release sites based on the relative size of each site as estimated by the Department. Enclosed are the various definitions of site and activity sizes as set forth in Chapter 269 as well as the fee schedule. For purposes of establishing a fee for the first phase of activity being conducted at Coca Cola Distribution Facility, the Department has made a preliminary determination that the site is a medium sized site as defined by Chapter 269. You should be aware that the law does allow the Department to make adjustments to initial site size determinations so that fee levels may be raised or lowered for subsequent phases of activity based on additional data. However, the law does not allow for retroactive application of such adjustments.

The Department has also made a determination that a Preliminary Endangerment Assessment (PEA) must be conducted at this site to determine whether it will be necessary to take some type of initial removal or remedial action to stabilize site conditions to reduce any acute public

STATE OF CALIFORNIA

OFFICE MEMO
STD 100 (REV 10/87)
87 46331

DATE: 2-08-90

TO: Mr. Peter Beard
U. S. TECH

ROOM/STA. NO.

FROM: Manny Alonso

PHONE NUMBER: (213) 590-4404 ATSS ☐

ROOM/STA. NO.

SUBJECT: PEA info.

The enclosed information on the preliminary endangerment assessment has been obtained from a draft document. Some changes might be possible to occur. These changes might include risk assessment data. I hope this info is of help to you.

300 000775

Put your thoughts to work. Submit a **MERIT AWARD SUGGESTION.**

The Preliminary Endangerment Assessment (PEA) was established as part of the Department of Health Services'(DHS) Toxic Substances Control Program(TSCP) hazardous waste site cleanup process effective July 1, 1989. This assessment is defined in Section 25319.5, Chapter 6.8, Division 20 of the California Health and Safety Code as:

> "25319.5. Preliminary endangerment assessment means an activity which is performed to determine whether current or past waste management practices have resulted in the release or threatened release of hazardous substances which pose a threat to public health or the environment."

Based on this definition, the PEA has been designed specifically to be the initial TSCP process for evaluating potential hazardous substance release sites. The PEA has three primary objectives. First, the assessment must determine if a release of hazardous substances has or has not occurred at the site. The second objective is to determine if an immediate stabilization action is warranted at the site to mitigate direct threats to public health and the environment posed by a release of hazardous substances or by situations that may result in a release of hazardous substances. In cases when a release of hazardous substances has occurred at a site, a third objective is to determine if the site poses a threat to Public health and the environment and requires remediation.

Private parties are now allowed to participate with the TSCP in conducting initial site evaluations as the result of the passage of Senate Bill 475. This bill added Section 25347.6 to the Health and Safety Code to allow the TSCP to oversee "removal or remedial action" work carried out by private parties on a fee-for-service basis. Activities such as the PEA are, by statutory definition (Health and Safety Code, Section 25322), considered to be within the category of remedial actions. The fee prescribed for the oversight of the PEA in Section 25347.6(d) is $7,500.00.

Pursuant to Section 25347.6, the PEA process has been separated into two distinct phases. The first phase, collection of data and preparation of a PEA report, is the responsibility of the private party requesting that a site be evaluated. The second phase, consisting of evaluation of the data/PEA report and issuance of a determination on the need for cleanup actions at the site, is the responsibility of the TSCP.

The overall roles and responsibilities of the TSCP and private parties in the PEA process are shown on Figure 1. The TSCP staff are responsible for: 1) initiating the billing of the private party by the State Board of Equalization for the $7,500.00 fee; 2) meeting with the private party to explain the PEA process and PEA report requirements; 3) conducting an agency records check and site inspection to familiarize themselves with the site being evaluated; 4) providing guidance to the private party relative to preparation of the PEA report; 5) overseeing any sampling done at the site by the private party; 6) reviewing the PEA report for completeness and

issuance of a determination of completeness; and 7) evaluating the data in the report and making a determination regarding the need for site cleanup actions at the site.

Several options are available to the TSCP staff in making a recommendation based on review of a PEA report. A no "No Further Action" recommendation is made in cases when no release of hazardous substances has occurred and this situation can be clearly documented and in cases when a release has occurred but the site does not present a threat to public health and the environment. In cases where a release has been documented and a threat exists, the recommendation would consist of moving the site forward into characterization and formal remediation. All sites considered to pose a medium to high threat will be required to carry out characterization and remediation activities under direct TSCP oversight. For sites considered to pose a low threat, the private parties will be provided with a list of approved site characterization and remediation procedures and they will be allowed to carry out this work without direct TSCP oversight. Two other recommendations are also possible when contamination exists. A stabilization action may be recommended for sites that pose an immediate threat to public health and the environment. Stabilization may consist of fencing the site, capping the contaminated area, removing degraded containers of hazardous substances, and other similar actions. A final option for a recommendation is to refer cleanup oversight of a contaminated site to another agency. This situation would occur in cases such as when the contamination is associated with a leaking underground storage tank. This sites would be referred because the Regional Water Quality Control Boards (RWQCB) and County Health Departments have been given the lead responsibility in this area Pursuant to Chapter 6.7. Division 20 of the California Health and Safety Code. The site would also be referred if other agencies have already initiated oversight of cleanup operations.

The primary responsibility of a private party in the PEA process is preparation of the PEA report. Specific responsibilities of the private party include: 1) submitting a written request to the TSCP to complete a PEA on a specific site; 2) payment of the $7,500.00 to the to the State Board of Equalization when billed for the fee; 3) meeting with the TSCP staff to receive the PEA Report Manual and to discuss completion of the assessment; 4) preparation of the PEA report in accordance with the specifications provided by the TSCP; and 5) modification of the report if necessary in accordance with a "Notice of Deficiency" issued by the TSCP staff and resubmittal of the report.

Several points regarding preparation of PEA reports need to be emphasized and kept in mind throughout the report preparation process. The primary focus of the reports must be on presenting the site specific data required by the PEA manual as clearly and concisely as possible. Using lists, bulleted outlines, tables and figures are preferable over long discussions. Failure to clearly provide the data required in the initial report will result in issuance of a "Notice of Deficiency" by the TSCP staff subsequent

to review of the report. If the report is not modified and resubmitted within 30 days or if the report is resubmitted in a form that is not responsive to the Notice of Deficiency it will be rejected and the PEA process for the site will be terminated. Reinitiation of the assessment process will require payment of a second $7,500.00 fee.

Since sites will be ranked in accordance with the Uncontrolled Hazardous Waste Site Ranking System; A Users Manual (reference: 40 Code of Federal Regulations, part 300 Appendix A), factors required under the Hazard Ranking System (HRS) are particularly important. The PEA manual provides suggested references for the various information requirements. Use of these references is not mandatory but in the event of conflicting information, these references will be considered authoritative unless a private party can clearly prove otherwise.

It may be appropriate to abbreviate the PEA report in some cases. This situation would occur when Section A, Site History and Description; Section B, Apparent problem; and Section C, Sampling Activities, clearly document that no release of hazardous substances has occurred and no threat of a release exists. In these cases, Section D - Factors Related to Known or Potential Site Contamination, Section E - Analysis of Pathways for Hazard Potential, and Section F Community Assessment may be deleted. If the report is abbreviated, Section G - Conclusions should clearly state the basis for not including Sections D, E and F private parties are encouraged to work closely with the TSCP staff assigned to oversee the data collection effort in preparing the report and when making a decision on not including sections.

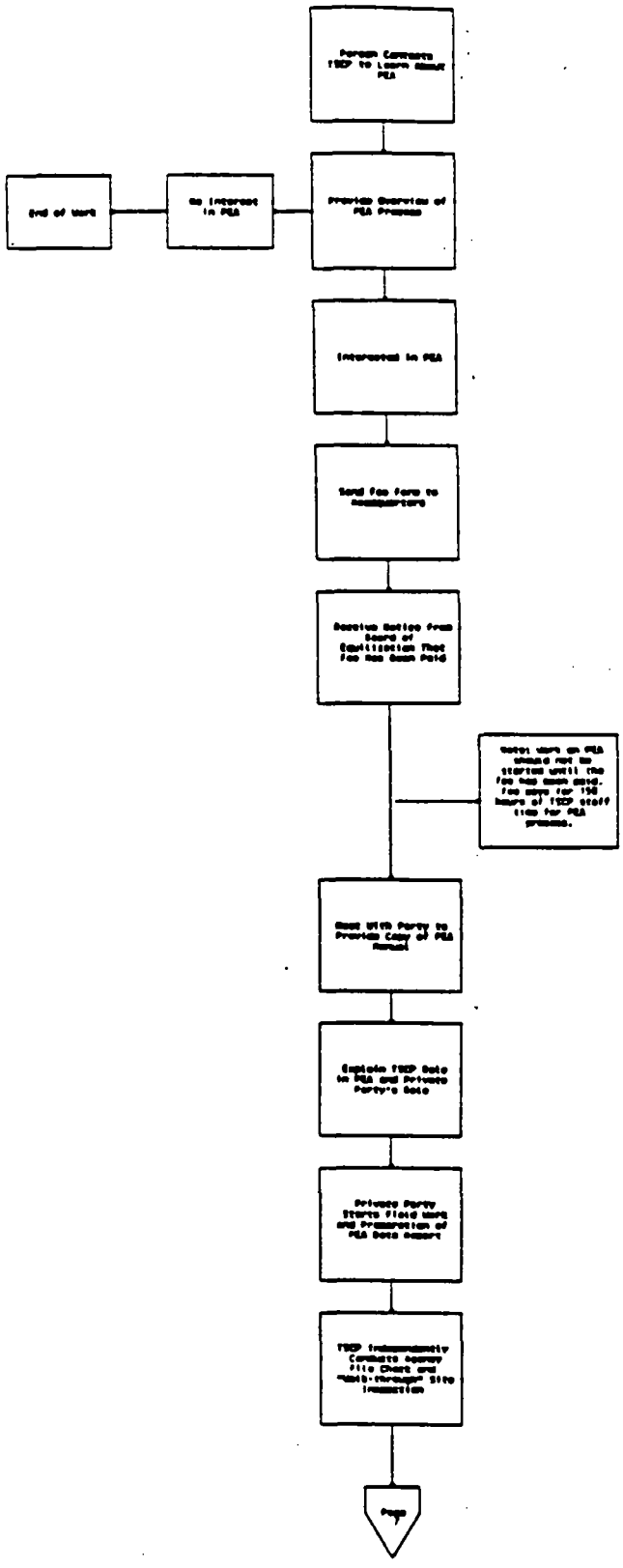


Figure 1
Process Flowchart for Oversight of a
Preliminary Endangerment Assessment

Draft 12/22/89

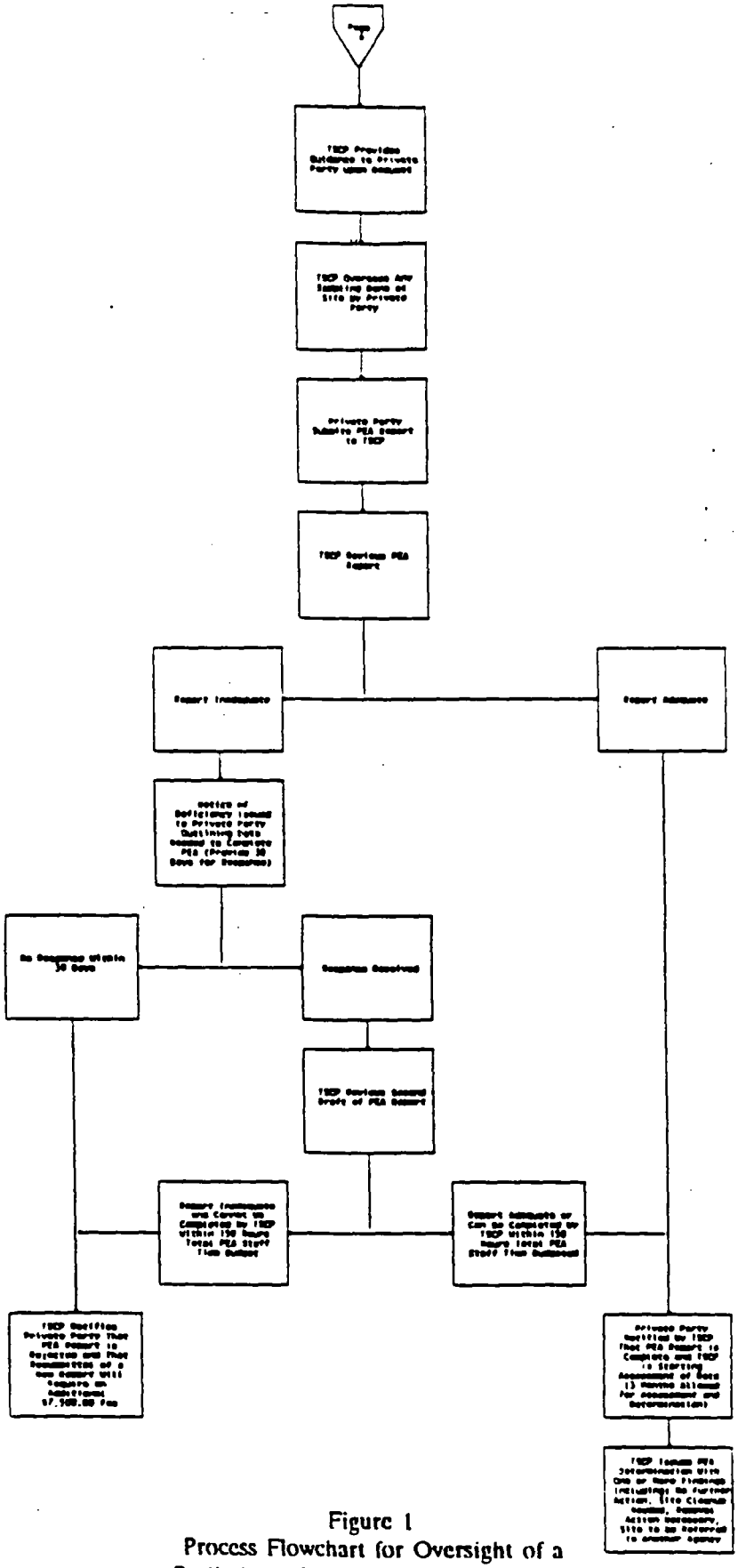


Figure 1
Process Flowchart for Oversight of a
Preliminary Endangerment Assessment

Draft 12/22/89

PRELIMINARY ENDANGERMENT ASSESSMENT CHECKLIST

Section	Location In Report	Adequate/ Inadequate
A. Site History and Description		
- Site Location:		
1) Facility Name	_____	_____
2) Street Address	_____	_____
3) Mailing Address	_____	_____
4) Phone Number	_____	_____
5) Other Names	_____	_____
6) EPA ID Number	_____	_____
7) ASPIS Number	_____	_____
8) Assessor's Parcel Number and Map	_____	_____
9) Township, Section, Range, Meridian	_____	_____
10) Map of Site Location	_____	_____
- Past and Current Site Activities:		
1) Business Type/Years of Operation	_____	_____
2) Facility Ownership/Operators	_____	_____
3) Property Owners	_____	_____
4) Process Description:		
a) Type/quantities of products	_____	_____
b) List of materials/chemicals used	_____	_____

Draft 12/22/89

Section		Location In Report	Adequate/ Inadequate
c)	Descriptive overview of process	_____	_____
d)	Map of All Site Features	_____	_____

- Hazardous Waste Management

1)	Waste Stream Identification and Waste Quantities	_____	_____
2)	On Site Storage, Treatment, and Disposal:		
a)	Description of storage units	_____	_____
b)	Description of treatment units	_____	_____
c)	Description of disposal practices	_____	_____
d)	Description of containment of storage, treatment, disposal units	_____	_____
e)	Description of recovery/recycling practices	_____	_____
f)	Off-site wastes recovered; origin, type, quantity	_____	_____
3)	Regulatory Status Identification	_____	_____
4)	Agency Inspection Results Summary	_____	_____

B. Apparent Problem

- Summary of Nature of Contamination at Site	_____	_____

Section	Location In Report	Adequate/ Inadequate
- Summary of Contaminants of Concern	_____	_____
- Justification for "No Further Action" Recommendation	_____	_____
C. Sampling Activities		
- Past Sampling Efforts	_____	_____
- PEA Sampling Efforts	_____	_____
- Analysis of Sampling Results	_____	_____
D. Factors Related to Known or Potential Site Contamination	_____	_____
- Hazardous Substances/Waste at the Site	_____	_____
- Characteristics of Hazardous Substances/Wastes:		
1) Physical State/Color	_____	_____
2) Molecular Weight	_____	_____
3) Specific Gravity or Density	_____	_____
4) Solubility	_____	_____
5) Freezing/Boiling/Melting Points	_____	_____
6) Vapor Pressure	_____	_____
7) Henry's Constant	_____	_____

Section		Location In Report	Adequate/ Inadequate
8)	Flashpoint	_____	_____
9)	Upper and Lower Explosive Limits	_____	_____
10)	NFPA Ignitibility Level Rating	_____	_____
11)	NFPA Reactivity Level Rating	_____	_____
12)	Incompatible Compounds	_____	_____
13)	pH	_____	_____
14)	Toxicity/Persistence Rating	_____	_____

- Exposure Routes and Toxicity:

1)	Exposure Data:		
	a) Description of Exposure Routes	_____	_____
	b) Description of Dispersion Mechanisms	_____	_____
	c) Timing of Releases	_____	_____
2)	Toxicity Data:		
	a) Description of Relative Toxicity	_____	_____
	b) General Toxicological Properties	_____	_____
	c) Standards (RfDs, etc.)	_____	_____

- Soil/Direct Contact Pathways

1)	Description of Soil Contamination and Recommendation	_____	_____
2)	Topography Description	_____	_____
3)	Land Use and Zoning Description	_____	_____

Section		Location In Report	Adequate/ Inadequate
4)	Description of Environmental Impacts	_____	_____
5)	Hydrologic Soil Group	_____	_____
6)	Description of Soil Permeability	_____	_____
7)	Description of Slope of Site	_____	_____
8)	Description of Soil Stability/Seismic Conditions	_____	_____
9)	Description of Site Accessibility	_____	_____
10)	Description of Containment Measures	_____	_____
11)	Locations of Sensitive Facilities (Schools, etc.)	_____	_____
12)	Locations of Sensitive Habitats	_____	_____

Factors Related to Water Pathways:

1)	Description of Water Contamination and Remediation	_____	_____
2)	Net Seasonal Perception	_____	_____
3)	Description of Hydrology	_____	_____
4)	For Interconnected Aquifers:		
	a) Distance to Nearest Well	_____	_____
	b) Population Using Water	_____	_____
	c) Irrigated Areas	_____	_____
5)	Aquifers Not Interconnected:		
	a) Distance to Nearest Wells	_____	_____
	b) Population Using Water From Each Aquifer	_____	_____
	c) Irrigated Areas for Each Aquifer	_____	_____

Section		Location In Report	Adequate/ Inadequate
6)	Ground Water Uses	_____	_____
7)	One Year/24-Hour Rainfall	_____	_____
8)	Distance to Nearest Downhill Surface Water	_____	_____
9)	Runoff Flow Distance and Water Intake Locations	_____	_____
10)	Runoff Control Measures	_____	_____
11)	Floodplain Identification	_____	_____
12)	Description of Migration Routes of Substance	_____	_____
13)	Description of Location and Uses of Surface Water Intakes	_____	_____
14)	Population Using/Acres Irrigated From Each Water Intake	_____	_____
15)	Distance to Wetland/Critical Habitat	_____	_____
16)	Sensitive Habitats That May be Affected by Runoff	_____	_____

Factors Related to Air Pathways:

1)	Description of Air Contamination and Remediation	_____	_____
2)	Wind Direction/Velocity	_____	_____
3)	Description of Local Climate	_____	_____
4)	Description of Timing of Release	_____	_____
5)	Description of Dispersion Routes	_____	_____

Draft 12/22/89

Section		Location In Report	Adequate/ Inadequate
6)	Populations of Residents/Workers	_____	_____
7)	Location/Distance to Sensitive Facilities (Schools, etc.)	_____	_____
8)	Location/Distance to Development Areas (Commercial/Industrial, etc.)	_____	_____
9)	Description of (Type, Location and Distance) Sensitive Areas (Wetlands, etc.)	_____	_____

E. Analysis of Pathways for Hazard Potential Determination

- Known Hazard:

1)	Contaminants Identified	_____	_____
2)	Target Populations/Environments Described	_____	_____
3)	Effects on Target Populations/Environments Described	_____	_____

- Potential Hazard:

1)	Contaminants Identified and Fate Described	_____	_____
2)	Potential Populations/Environments Identified	_____	_____
3)	Potential Effects on Human/Environmental Targets	_____	_____
4)	Uncertainty Factors	_____	_____

- No Potential Hazard:

Section	Location In Report	Adequate/ Inadequate
1) Factors Showing No Hazard Exists	_____	_____
F. Community Assessment		
- Summary of Community Concern	_____	_____
- Concerns/Issues Identified by Locals	_____	_____
- Community Views on Actions at Site	_____	_____
- Recommended Information Repositories	_____	_____
- Names/Addresses of Interested Parties	_____	_____
G. Conclusions		
- Release/Potential Release Identified	_____	_____
- Threat to Public Health/Environment Identified	_____	_____
- Stabilization Action Need Identified	_____	_____

USTEC
U.S. Technical Environmental
Consulting, Inc.

May 11, 1990

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: **19875 PACIFIC GATEWAY DRIVE, CALIFORNIA DEPARTMENT OF HEALTH SERVICES, ASSESSMENT OF REVIEW FEE. JOB NO. 89007.**

Dear Mr. Ramirez:

This letter is to inform you that we are in receipt of an invoice to Coca-Cola for a fee of $7,500.00 payable to the California State Board of Equalization, a copy of which is attached. This invoice was issued due to the fact that the California Department of Health Services (DOHS) has determined that the review of the data that we submitted to them would be the equivalent to what they call a Preliminary Endangerment Assessment.

The DOHS is now required, by legislation, to charge fees to review reports and to prepare decisions. This policy came into effect during the time work was being performed on the subject site. Basically, DOHS delayed their responses to any communications until this fee mechanism was in place.

An appeal process is available, which we intend to pursue on your behalf given your approval. The basis for the appeal would be that our report was intended to notify DOHS of a specific limited activity to be carried out on the site that might involve hazardous waste. During the course of the work it was demonstrated that the material in question was non-hazardous and was self-certified as such, which is an allowable option under DOHS regulations, therefore no review or determination is required from DOHS for the work performed or the information submitted.

For the record, we will also request that the correct name and address for the owner of the site be entered in the files.

300 000789

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

Coca-Cola Enterprises - West
Job No. 89007

Please contact us with any questions or comments at your earliest convenience so that we may submit the appeal. Also, notify us if you wish to involve your legal staff so that we might provide them with the necessary information.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING

Peter A. Beaver
Manager Remediation Services

Steven M. Myers, R.G.
President

Attachment

Copies to: Ed Todd

BT-1210 REV. 5 (12-86)

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001

EXCISE TAX (ACTIVITY FEE) (916) 739-2582

RE	PM
EFFECTIVE DATE OF PAYMENT	
MO. DAY YEAR	

IN REPLY REFER TO:

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE: APRIL 26,1990

ACCOUNT NUMBER		
HC	HQ	36-83483

NOTICE OF DETERMINATION

YOU ARE HEREBY NOTIFIED OF AN AMOUNT DUE FROM YOU PURSUANT TO THE HAZARDOUS SUBSTANCES TAX LAW (ACTIVITY FEE)

RECEIVED
APR 30 1990

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL
AS ASSESSED				
03/08/90-03/08/90	7500.00			7500.00
L--0000				
TOTAL	7500.00			7500.00
****PAY THIS AMOUNT				7500.00

ADDITIONAL INTEREST OF $87.50 ACCRUES ON THE AMOUNT OF FEE DUE AT THE MODIFIED ADJUSTED RATE OF 1.1666 OF ONE PERCENT (.011667) EACH MONTH, OR FRACTION THEREOF, IF NOT PAID ON OR BEFORE 05/31/90.

ADDITIONAL PENALTY OF 750.00 IF NOT PAID BEFORE 05/26/90.

THE ACTIVITY FEE INDICATED ABOVE HAS BEEN ASSESSED PURSUANT TO SECTION 25347.6 OF THE HEALTH AND SAFETY CODE AND IS BASED UPON ACTIVITIES PERFORMED BY THE DEPARTMENT OF HEALTH SERVICES.

THE ABOVE FEE IS BASED ON A PRELIMINARY ENDANGERMENT ASSESSMENT.

SITE : 19875 PACIFIC GATEWAY DRIVE

DOHS TRANSMITTAL NUMBER 90-4-12-SM

INFORMATION CONCERNING DETERMINATIONS

A PERSON AGAINST WHOM A DETERMINATION IS MADE OR ANY PERSON DIRECTLY INTERESTED MAY PETITION FOR REDETERMINATION WITH THE BOARD OF EQUALIZATION WITHIN 30 DAYS FROM THE DATE SHOWN AT THE TOP OF THIS NOTICE.

A PETITION MUST BE IN WRITING AND STATE THE SPECIFIC GROUNDS UPON WHICH IT IS FOUNDED. ANYONE FILING A PETITION SHOULD BE PREPARED TO SUBMIT DOCUMENTARY EVIDENCE TO SUPPORT THE SPECIFIC GROUNDS UPON REQUEST.

IF A HEARING IS DESIRED, IT SHOULD BE REQUESTED IN THE PETITION. THE REQUEST SHOULD SPECIFY WHETHER AN INFORMAL MEETING WITH A HEARING OFFICER AT THE NEAREST DISTRICT OFFICE OR A HEARING BEFORE THE BOARD IN SACRAMENTO

PLEASE RETURN THIS COPY WITH YOUR PAYMENT 300 000791
ALWAYS WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK OR MONEY ORDER

BT-1210 REV. 5 (12-86)

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001

RE	PM
EFFECTIVE DATE OF PAYMENT	
MO. DAY YEAR	

IN REPLY REFER TO:

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE: APRIL 26,1990

ACCOUNT NUMBER		
HC	HQ	36-0348

NOTICE OF DETERMINATION

PAGE 2

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL

IS DESIRED. A 10 DAY NOTICE OF THE TIME AND PLACE OF HEARING WILL BE GIVEN.

THE FILING OF A PETITION WILL NOT PREVENT THE ACCRUAL OF INTEREST. THE APPLICATION OF ADDITIONAL PENALTY REFERRED TO ABOVE WOULD BE DEFERRED UNTIL 30 DAYS AFTER THE DATE OF A NOTICE OF REDETERMINATION.

PROMPT PAYMENT OF UNDISPUTED PORTIONS OF THE LIABILITY SHOULD BE MADE. THIS WILL PREVENT ACCRUAL OF ADDITIONAL INTEREST THEREON AND WILL NOT IN ANY WAY AFFECT THE PROTESTED PORTIONS.

300 000792

PLEASE RETURN THIS COPY WITH YOUR PAYMENT
ALWAYS WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK OR MONEY ORDER

BT-1210 REV. 3 (12-86)

RE	PM
EFFECTIVE DATE OF PAYMENT	
MO.	DAY YEAR

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001

IN REPLY REFER TO:

EXCISE TAX (ACTIVITY FEE) (916) 739-2582

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE: APRIL 26,1990

ACCOUNT NUMBER: HC HQ 36-03483

RECEIVED
APR 30 1990

NOTICE OF DETERMINATION

YOU ARE HEREBY NOTIFIED OF AN AMOUNT DUE FROM YOU PURSUANT TO THE HAZARDOUS SUBSTANCES TAX LAW (ACTIVITY FEE)

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL
AS ASSESSED 03/08/90-03/08/90	7500.00			7500.00
L-0000				
TOTAL	7500.00			7500.00
			****PAY THIS AMOUNT	7500.00

ADDITIONAL INTEREST OF $87.50 ACCRUES ON THE AMOUNT OF FEE DUE AT THE MODIFIED ADJUSTED RATE OF 1.1666 OF ONE PERCENT (.011667) EACH MONTH, OR FRACTION THEREOF, IF NOT PAID ON OR BEFORE 05/31/90.

ADDITIONAL PENALTY OF 750.00 IF NOT PAID BEFORE 05/26/90.

THE ACTIVITY FEE INDICATED ABOVE HAS BEEN ASSESSED PURSUANT TO SECTION 25347.6 OF THE HEALTH AND SAFETY CODE AND IS BASED UPON ACTIVITIES PERFORMED BY THE DEPARTMENT OF HEALTH SERVICES.

THE ABOVE FEE IS BASED ON A PRELIMINARY ENDANGERMENT ASSESSMENT.

SITE : 19875 PACIFIC GATEWAY DRIVE

DOHS TRANSMITTAL NUMBER 90-4-12-SM

INFORMATION CONCERNING DETERMINATIONS

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A PETITION MUST BE IN WRITING AND STATE THE SPECIFIC GROUNDS UPON WHICH IT IS FOUNDED. ANYONE FILING A PETITION SHOULD BE PREPARED TO SUBMIT DOCUMENTARY EVIDENCE TO SUPPORT THE SPECIFIC GROUNDS UPON REQUEST.

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300 000793

PLEASE RETURN THIS COPY WITH YOUR PAYMENT
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BT-1210 REV. 5 (12-86)

STATE BOARD OF EQUALIZATION
DEPARTMENT OF BUSINESS TAXES
P.O. BOX 942879 SACRAMENTO, CALIFORNIA 94279-0001

RE	PM
EFFECTIVE DATE OF PAYMENT	
MO. DAY YEAR	

IN REPLY REFER TO:

PETER BEAVER
COCA COLA ENT.-WEST/US TECHNICAL
1414 W. BROADWAY RD., STE. 150
TEMPE AZ 85282

DATE: APRIL 26,1990

ACCOUNT NUMBER: HC HQ 36-0348

NOTICE OF DETERMINATION

PAGE 2

	AMOUNT			
	FEE	INTEREST	PENALTY	TOTAL

IS DESIRED. A 10 DAY NOTICE OF THE TIME AND PLACE OF HEARING WILL BE GIVEN.

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PROMPT PAYMENT OF UNDISPUTED PORTIONS OF THE LIABILITY SHOULD BE MADE. THIS WILL PREVENT ACCRUAL OF ADDITIONAL INTEREST THEREON AND WILL NOT IN ANY WAY AFFECT THE PROTESTED PORTIONS.

300 000794

PLEASE RETURN THIS COPY WITH YOUR PAYMENT
ALWAYS WRITE YOUR ACCOUNT NUMBER ON YOUR CHECK OR MONEY ORDER

CCE-West
Bottlers of Coca-Cola
1334 South Central Avenue
Los Angeles, CA 90021
(213) 746-5555
(213) 744-8904 (Fax)

TORRANCE FILE

FACSIMILE COVER SHEET

DATE: 4-3-90 TIME: 5:05 PM

PLEASE DELIVER THE FOLLOWING 3 PAGE(S) TO: include coverpage

NAME: Pete Beaver DEPT.: US Pest

FACSIMILE NUMBER: (602) 829-6315

FROM: Raul Ramirez

COMMENTS:

Attached invoice has been sent to this office for payment. Please verify all has been completed so payment can be sent for processing.

IF YOU DO NOT RECEIVE "ALL" PAGES, PLEASE CALL:

(213) 746-5555 EXT.: 4335

300 000795

Brent Petroleum Corporation

Telephone: (213) 432-5991
Telex: 188030-BPC OIL
FAX: (213) 437-7815

100 Oceangate, Suite 1024
Long Beach, CA 90802

INVOICE

MARCH 30, 1990

TO: COCA-COLA ENTERPRISES WEST
1334 S. CENTRAL AVENUE
LOS ANGELES, CA 90021

INVOICE# 066-S

P.O.# 48987

ATTENTION: MR. RAUL RAMIREZ

TRANSACTION: RECEIPT FOR NON-HAZARDOUS CONTAMINATED SOIL FROM COCA-COLA ENTERPRISES WEST AT 1334 S. CENTRAL AVENUE, LOS ANGELES, CA 90021 DELIVERED TO BRENT PETROLEUM'S SOLID FACILITY.

QUANTITY: 1,628.38 TONS

CHARGE: $ 75.00 PER TON

TOTAL DUE: $122,128.50

TERMS: TOTAL DUE 15 DAYS UPON RECEIPT OF INVOICE AND SUPPORTING DOCUMENTS.

PLEASE REMIT PAYMENT BY CHECK TO THE ADDRESS ABOVE. THANK YOU.

RECEIVED
APR - 3 1990

Brent Petroleum Corporation

Telephone: (213) 432-5991
Telex: 188030-BPC OIL
FAX: (213) 437-7815

100 Oceangate Suite 1024
Long Beach, CA 90802

CERTIFICATE OF REUSE

GENERAL WASTE QUESTIONAIRE	COMPLETED YES
WASTE PROFILE FORM	COMPLETED YES
T.M. # ISSUED	COMPLETED 066-S
HAZARDOUS	COMPLETED NO
NON-HAZARDOUS	COMPLETED YES
R.C.R.A.	COMPLETED NO

B.P.C. CHARACTERIZATION:

THIS IS TO CERTIFY THAT 1,628.38 TONS OF NON-HAZARDOUS CONTAMINATED SOIL WAS DELIVERED TO BRENT PETROLEUM'S FACILITY ON MARCH 28TH AND 29TH, OF 1990.
TRANSPORTED BY- HAWK WING INCORPORATED
PER- U.S. TECHNICAL INCORPORATED•1414 W. BROADWAY RD.,STE. 150•TEMPE,AZ 85282
JOB LOCATION- COCA-COLA ENTERPRISE WEST•1334 S. CENTRAL AVENUE•LOS ANGELES, CA
ANALYSIS ON FILE.

BRENT PEROLEUM CORPORATION, E.P.A. I.D.# CAD981458466, CERTIFIES THAT THE ABOVE MATERIAL WAS ACCEPTED INTO BRENT'S FACILITY IN COMPLIANCE WITH TITLE 22 OF THE CALIFORNIA HEALTH & SAFETY CODE AND SENATE BILL 4636. THE MATERIAL HAS BECOME THE SOLE PROPERTY OF BRENT PETROLEUM CORPORATION AND IS IN THE PROCESS OF BEING RECYCLED IN ACCORDANCE WITH STATE AND FEDERAL LAWS.

DATE: MARCH 30, 1990

X Margaret A. Pimentel
MARGARET A. PIMENTEL,
SALES COORDINATOR

USTEC U.S. Technical Environmental Consulting, Inc.

March 2, 1990

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: CARSON PROJECT, FEBRUARY BILLING.

Dear Raul:

U.S. Technical Environmental Consulting, Inc. (USTEC) is in receipt of your facsimile dated March 1, 1990 requesting costs incurred for the month of February at the Carson, California project.

Costs for the month total $2,229.15. Backup materials will be sent via Federal Express with delivery on March 5, 1990. If you have any questions, please call myself or Beth Miller (Accounting Manager) at (602) 829-6311.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Wendy Weir for

Steven M. Myers, R.G.
President

/weh

300 000798

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

USTEC
U.S. Technical Environmental
Consulting, Inc.

January 17, 1990

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: CCE FACILITY, CARSON, CALIFORNIA. JOB NO. 89007.

Dear Raul:

After our telephone conversation on January 14, 1990, concerning the Carson, California site, I want to make sure that I presented correctly the existing situation, options, costs, and benefits versus drawbacks.

As you are aware, approximately 1,800 cubic yards of soil contaminated with total petroleum hydrocarbon (TPHC) concentrations over 1,000 ppm and with detectable polynuclear aromatic compound (PNAs) concentrations were identified beneath the site. Under the direction of U.S. Technical Environmental Consulting, Inc. (USTEC), this material was excavated and stored on site pending selection of a remedial technology.

USTEC's initial remedial recommendation was for the construction of a lined "treatment cell" in which the contaminated soil would be placed and treated biologically. Cost estimates for this technology were placed in the $500,000.00 range. This technology represented virtually no future or additional liability to Coca-Cola Enterprises (CCE).

However, through testing completed in the preliminary treatment cell feasibility study, concentrations of PNAs which were deemed unsuitable for biological degradation were discovered in the material.

Of the remedial options considered at this point (incineration, incorporation into asphalt, and simple burial), only asphalt incorporation and simple burial were deemed to be reasonably cost effective by CCE. USTEC's recommendation at that time was to have the material made into asphalt. Estimated costs for this technology were in the $250,000.00 range. However, it was determined through contact with the various state regulators and the asphalt production company, that the facility could not receive material contaminated with potentially hazardous substances. A letter from Brent Petroleum to DHS dated September 1989 is attached for your review. State regulations are unclear as to the classification of PNAs at low concentrations therefore, specific approval could not be granted.

As a final recommendation set forth in order to allow construction of the building, USTEC recommended simple burial as the remedial technology. This recommendation and reasoning was sent to CCE in USTEC's Subsurface Investigation Report dated December 11, 1989.

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

Coca-Cola Enterprises - West
Job No. 89007

In accordance with your request, USTEC pursued an expedited review of the report from both the Department of Health Services (DOHS) and the California Regional Water Quality Control Board. Verbal comments were received last week from DOHS. A summary of the comments is presented below.

- DOHS will not render any opinion on the site at this time. They are requiring a review fee of $7,500.00 to make a hazardous waste determination and an additional $7,500.00 to review USTEC's report. The review process will take about 90 days. Final written approval could take up to six months depending on their interpretation and understanding of the site conditions.

- It is USTEC's opinion that the DOHS will grant permission to bury the contaminated soil on-site. However, prior to approval, DOHS may want additional on-site exploration (three groundwater monitoring wells sampled at 5-foot intervals) additional soil chemistry, and possibly additional historical site information. The cost of providing this data could easily approach $50,000.00 to $75,000.00

- Although DOHS won't render an opinion at this point, they will allow USTEC and CCE to "self-certify" the material as non-hazardous if four samples were analyzed for fifteen priority metals, PCBs, pesticides, fish bio-toxicity tests and the results are acceptable. This is a significant concession from the regulators. The "self certification" will allow the material to be converted into asphalt. The asphalt plant (Brent Petroleum) has agreed to accept the results of the "self-certification" process. The cost for additional testing, reporting, transportation, and conversion to asphalt is estimated to around $175,000.00.

Please note that despite repeated phone calls, Water Quality has yet to respond. The concurrence of this agency is required if formal approval of the burial option is to be obtained.

Based on the recent decisions (or lack of) from the state agencies, USTEC has outlined two disposal/remediation options. These options are presented below.

300 000800

Coca-Cola Enterprises - West
Job No. 89007

OPTION NUMBER 1: ON-SITE BURIAL

Associated Costs	Advantage	Disadvantage
Additional Chemistry at $6,000	Cost savings of about $50,000 over asphalt conversion	Maintain ownership of contaminated material
Additional Exploration at $75,000		90 days to 6 months before approval granted
Agency Reviews at $15,000		Additional exploration may be required
Excavation, placement, compaction at $25,000		Requires Water Quality Board approval
Estimated Total = $126,000		

OPTION NUMBER 2: CONVERT TO ASPHALT

Associated Costs	Advantage	Disadvantage
Additional chemistry at $6,000	CCE no longer owns the material	Cost is approx. $50,000 more than burial
Transport/mixing into asphalt at $170,000 (63.00/ton)	Material can be removed from the site in next 5 to 10 days	
	No Water Quality Board approval required	
Estimated Total = $176,000		

Regardless of the method selected, additional chemistry is being requested by DHS. Attached is a Letter of Authorization allowing USTEC to proceed with the sampling and analyses. Please sign and return one copy to USTEC.

Coca-Cola Enterprises - West
Job No. 89007

Based on the available data and the DOHS concession to allow "self-certification" of the material, U.S. Technical Environmental Consulting, Inc. recommends that the material be converted to asphalt rather than buried.

If you have any questions, please call us at (602) 829-6311.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Peter A. Beaver
Senior Project Manager

Steven M. Myers, R.G.
President

/weh

Attachments: Letter of Authorization (2)
Letter, Brent Petroleum to DHS, Sept. 7, 1989

LETTER OF AUTHORIZATION

U.S. Technical Environmental Consulting, Inc. (USTEC) is hereby authorized to collect additional soil samples from the Coca-Cola facility currently under construction in Carson, California.

Four samples are to be submitted to a state certified laboratory and analyzed for E.P. Toxicity Metals, PCBs, Pesticides, and Fish Bio-Assay tests. USTEC estimates analytical costs of about $1,250.00 per sample. Additional costs of about $1,000.00 are expected to cover USTEC's sampling time, travel time, data analysis, and report preparation.

Samples are to be collected during the week of January 15-19, 1990. Analytical testing will be on a regular turnaround schedule unless instructed differently by Coca-Cola.

If this scope of work meets with your approval, please sign the signature block and return one copy to USTEC. Please retain one copy for your files.

Accepted by:_____

Title:_____

Date:_____

Brent Petroleum Corporation

Telephone (213) 432-5991
Telex: 188030-BPC Oil
Fax: (213) 437-7815

100 Oceangate, Suite 1024
Long Beach, CA 90802

September 7, 1989

Bob McCormick
Alternative Technology Section
Toxic Substances Control Division

Dear Mr. McCormick,

Brent Petroleum Corporation, currently an I.S.D. facility (CAD #98145446) located in Wilmington, California has begun accepting certain non-hazardous hydrocarbon contaminated soils. These soils are being used as a replacement component in the manufacture of several grades of commercial asphalt. Brent has retained an Environmentally Oriented Law Firm, familiar with matters of this nature, to perform the due diligence necessary to insure compliance with the State and Federal Laws. We feel certain that our operation fulfills not only the letter of the Law, but the spirit in which it was written. As you know, California Legislature is sending out clear messages to generators asking them to recycle their waste whenever possible. Landfills are an expensive disposal method with unending liability.

Although the State Department of Health Services is not responsible for the management of non-hazardous wastes, we feel obligated to inform your office of our activities. Refer to Section 66305 (c) of Title 22, Division and Chapter 30 California Code of Regulations, the proper classification of hydrocarbon contaminated soils. Brent Petroleum Corp. has carefully tested the asphalt product we produce, and have found that within certain parameters, this soil does not effect the specifications or leaching qualities of the products produced. The soil clearly is an alternative to higher priced virgin products, and can be used directly with no pre-treatment into our system. Although, the system did require modification to comply with local Air Quality Management District Standards. Brent Petroleum is awaiting final approval of our T.S.D. Part B application for treatment of hazardous liquid waste. Currently, we are authorized to sign California Hazardous Waste Manifests. Our current status requires regular inspection from D.H.S.

representatives. Brent has in the past, and intends in the future, to make available all documentation relating to this activity.

Recently a senior investigatior visited the Brent site, as well as our Liquid Processing Operation. He has verbally informed us that we are in substantial conformance. Brent Petroleum retains the services of an independent firm to monitor compliance with S.C.A.Q.M.D. statue 1166. They visit our site twice each week and no violation has been recorded. Additionally, S.C.A.Q.M.D. officers visit our site weekly as part of their normal route, again no violations have been recorded.

Brent has also recently obtained product liability insurance for the asphalt products we are manufacturing. We have not received any negative feedback in reference to our product.

Brent Petroleum Corporation as part of our normal Due Diligence is requesting your departments assistance in obtaining documentation on the proper classification of the Hydrocarbon contaminated soil we accept. Based upon Section 66305. We believe the soil is properly classified as non-hazardous. We substantiate our position by referencing, communication with your office, previous correspondence and a letter to a major oil company, classifying soil with a T.P.H. greater than 100 as non-hazardous. (Enclosed).

We are requesting copies of other correspondence you might have which would shed light on this potential problem. [redacted] We are requesting the departments assistance in determing when a material is not hazardous. Some kind of guideline would be helpful. S.B. 245 imposses a $7,500 fee for this determination. We think this fee is appropriate in some cases, but not all. Hopefully, we can avoid this fee from time to time by understanding the criteria in Section 66305 (c) Title 22-CCR and by reviewing the actual documentation the department provides.

Brent Petroleum understands the risk in self certifying (Section 66305(b) CCR. In order to mitigate potential problems we feel this information would be useful.

Thank you,

P Bouchard

Paul Bouchard

PB:rf

ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)
5/18/89

PRODUCER

X
Jardine Emett & Chandler
12397 Lewis, Suite 101
Garden Grove, California 92640

CODE 714-740-1127 SUB-CODE

INSURED

Brent Petroleum Corporation
100 Oceangate, Suite 1024
Long Beach, California 90802

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A — Lloyds and London Companies

COMPANY LETTER B

COMPANY LETTER C

COMPANY LETTER D

COMPANY LETTER E

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS	
X	GENERAL LIABILITY				GENERAL AGGREGATE	$
	COMMERCIAL GENERAL LIABILITY				PRODUCTS-COMP/OPS AGGREGATE	$ 1,000,
	CLAIMS MADE X OCCUR.	M89F?0828	4/21/89	4/21/90	PERSONAL & ADVERTISING INJURY	$ 1,000,
	OWNER'S & CONTRACTOR'S PROT.				EACH OCCURRENCE	$ 1,000,
					FIRE DAMAGE (Any one fire)	$
					MEDICAL EXPENSE (Any one person)	$
	AUTOMOBILE LIABILITY				COMBINED SINGLE LIMIT	$
	ANY AUTO				BODILY INJURY (Per person)	$
	ALL OWNED AUTOS				BODILY INJURY (Per accident)	$
	SCHEDULED AUTOS				PROPERTY DAMAGE	$
	HIRED AUTOS					
	NON-OWNED AUTOS					
	GARAGE LIABILITY					
	EXCESS LIABILITY				EACH OCCURRENCE $	AGGREGATE $
	OTHER THAN UMBRELLA FORM					
	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY	
					$	(EACH ACCIDENT)
					$	(DISEASE—POLICY LIMIT)
					$	(DISEASE—EACH EMPLOYEE)
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS

This certificate is issued as evidence of insurance pending issuance of policy.

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Ed Gottlieb

300 000806

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STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

January 29, 1990

Mr. Peter Beaver
Senior Project Manager
Coca Cola Enterprises - West/U.S. Technical
Environmental Consulting, Inc.
1414 West Broadway Road, Suite 150
Tempe, AZ 85282

Dear Mr. Beaver:

ACTIVITY FEE PROGRAM

By your letter of December 11, 1989 to the Department of Health Services (Department) you have identified your client, Coca Cola Enterprises - West, as the party primarily responsible for taking action to characterize and remedy any public health and/or environmental threats posed by any uncontrolled releases of hazardous substances at 19875 Pacific Gateway Drive in Carson, CA. Pursuant to legislation (Chapter 269, Statutes of 1989) which was recently signed into law by the Governor, you are obligated to pay activity fees to partially cover the Department's cost of evaluating and overseeing your actions to characterize and satisfactorily remediate this site. This includes the evaluation of the site assessment report you submitted and providing you with recommendations for future remedial actions.

Chapter 269 sets out specific fees for the various phases of activity associated with characterizing and abating hazardous substance release sites based on the relative size of each site as estimated by the Department. Enclosed are the various definitions of site and activity sizes as set forth in Chapter 269 as well as the fee schedule. For purposes of establishing a fee for the first phase of activity being conducted at Coca Cola Distribution Facility, the Department has made a preliminary determination that the site is a medium sized site as defined by Chapter 269. You should be aware that the law does allow the Department to make adjustments to initial site size determinations so that fee levels may be raised or lowered for subsequent phases of activity based on additional data. However, the law does not allow for retroactive application of such adjustments.

The Department has also made a determination that a Preliminary Endangerment Assessment (PEA) must be conducted at this site to determine whether it will be necessary to take some type of initial removal or remedial action to stabilize site conditions to reduce any acute public

health and environmental threats posed by currents site conditions. The fee for conducting a PEA is $ 7,500 regardless of site size.

Chapter 269 requires the State Board of Equalization (Board) to collect the fees established by the Department under the Act. You may expect to receive a demand from the State Board in the near future based on the fee levels described herein. As each phase of activity associated with a fee is completed at the site, a demand for the fee that is associated with the next phase of activity will be sent to you by the State Board. In cases where fees are not paid promptly, the State Board is empowered to seize personal as well as business assets and take other enforcement actions to ensure payment.

Please contact Manny Alonzo at (213)590-4904 if you have any questions regarding this new program or required actions at the site.

Sincerely,

John J. Kearns
Regional Administrator

Enclosures

cc: Raul Ramirez
Coca Cola Enterprises West
1334 South Central Avenue
Los Angeles, CA 90021

ATTACHMENT A

SB 475: Site Size Definitions

Site Sizes	**Small site** - RI/FS* cost less than $250K and FRA+ less than $1M
	Medium site - RI/FS cost between $250K and $1.25M and FRA between $1M and $5M
	Large site - RI/FS cost between $1.25M and $5M and FRA between $5M and $20M
	Extra-Large site - RI/FS cost greater than $5M and FRA greater than $20M
Removal Action (RA)	**Small RA** - less than $500K
	Medium RA - $500K to $1M
	Large RA - $1M to $5M
	Extra-Large RA - greater than $5M
Operation and Maintenance (O&M)	**Small O&M** - Annual cost less than $500K
	Medium O&M - Annual cost $500K to $1M
	Large O&M - Annual cost $1M to $5M
	Extra-Large O&M - Annual cost greater than $5M

* RI/FS = Remedial Investigation/Feasibility Study
\+ FRA = Final Remedial Action

SB 475 Fee Schedule

Site Size Estimation Fee	$5,000 (applicable to all sites)
Endangerment Assessment Fee	$7,500 (applicable to all sites)
Removal Action Oversight Fee	Variable, dependent on site size: $14,500 (small sites) $37,000 (medium sites) $73,500 (large sites) $147,000 (extra-large sites)
Remedial Investigation/Feasibility Study (RI/FS) Oversight Fee	Variable, dependent on site size: $21,500 (small sites) $43,000 (medium sites) $85,500 (large sites) $200,000 (extra-large sites)
Remedial Action Plan (RAP) Oversight Fee	Variable, dependent on site size: $4,500 (small sites) $9,000 (medium sites) $18,000 (large sites) $38,000 (extra-large sites)
Remedial Design Oversight Fee	Variable, dependent on site size: $7,500 (small sites) $14,500 (medium sites) $29,000 (large sites) $80,000 (extra-large sites)
Final Remedial Action (FRA) Oversight Fee	Variable, dependent on site size: $10,000 (small sites) $20,000 (medium sites) $40,000 (large sites) $106,000 (extra-large sites)
Operation and Maintenance (O&M) Oversight Fee	Variable, dependent on site size: $6,000 per year (small sites) $12,000 per year (medium sites) $14,000 per year (large sites) $34,000 per year (extra-large sites)

Prorating/Adjusting SB 475 Fees

I. Prorating Fees

SB 475 fees take effect July 1, 1989. Fees for phases of site investigation and cleanups in progress as of that date are to be prorated as described below. Fees will not be assessed for phases completed prior to July 1, 1989; instead, there will be 100% cost recovery per H&SC 25360.

To prorate the fee:

1. identify phase of activity in progress on July 1, 1989, and site or activity size;
2. identify defined length of activity;
3. divide activity fee by number of months defined for activity;
4. the result is the ***monthly fee quotient***;
5. multiply number of months the site has been in the phase of activity (as of July 1, 1989) by monthly fee quotient; and
6. subtract that amount from total fee.
7. The result is the ***prorated fee.***

For fee proration purposes, SB 475 stipulates the following timeline for phases of site activity:

Estimation of Site Size	**3 months (all sites)**
Preliminary Endangerment Assessment	**3 months (all sites)**
Removal Actions	**4 months (small sites)** **6 months (medium sites)** **12 months (large sites)** **24 months (extra-large sites)**
Remedial Investigation/ Feasibility Study (RI/FS)	**9 months (small action)** **17 months (medium action)** **33 months (large action)** **60 months (extra-large action)**
Remedial Action Plan (RAP)	**3 months (small sites)** **3 months (medium sites)** **6 months (large sites)** **9 months (extra-large sites)**
Remedial Design (RD)	**2 months (small sites)** **3 months (medium sites)** **6 months (large sites)** **12 months (extra-large sites)**
Final Remedial Actions	**4 months (small sites)** **8 months (medium sites)** **20 months (large sites)** **40 months (extra-large sites)**
Operation and Maintenance (O&M)	**12 months per year (all sites)**

For fee assessment purposes, RI/FS activity will not be considered to be commenced prior to the date that DHS approved an RI/FS workplan. For determining the start date for other phases of activity that may be ongoing, the following will apply:

- the RAP phase begins on the date the final RI/FS report was approved by DHS.
- the RD phase begins on the date the final RAP was approved by DHS.
- the final remedial action phase begins on the date the final remedial design was approved by DHS.
- the O&M phase begins on the date that the site cleanup certification form was signed by DHS.

II. Adjusting Fees

DHS is authorized to reclassify site size at any time. However, for fee assessment purposes, the new size classification would only apply to fees assessed for subsequent phases of site investigation and cleanup activity and not to completed or current phases.

III. Additional Charges to RPs

Although SB 475 has established specific fees to be charged to RPs for site investigation and cleanup oversight, the law continues to require DHS to recover all identifiable costs beyond those covered by the fees. Essentially, the new fees are analogous to "downpayments" against future cost recovery actions, since actual oversight costs will be in excess of the fees established by SB 475.

TORRANCE

STATE OF CALIFORNIA

OFFICE MEMO
STD. 100 (REV. 10/87)
87 46331

DATE: 2-08-90

TO: Mr. Peter Beard
U. S. TECH

ROOM/STA. NO:

FROM: Manny Alonzo

PHONE NUMBER: (213) 590-4404 ATSS ☐

ROOM/STA. NO:

SUBJECT: PEA info.

The enclosed information on the preliminary endangerment assessment has been obtained from a draft document. Some changes might be possible to occur. These changes might include risk assessment data. I hope this info is of help to you.

300 000813

Put your thoughts to work. Submit a **MERIT AWARD SUGGESTION.**

The Preliminary Endangerment Assessment (PEA) was established as part of the Department of Health Services'(DHS) Toxic Substances Control Program(TSCP) hazardous waste site cleanup process effective July 1, 1989. This assessment is defined in Section 25319.5, Chapter 6.8, Division 20 of the California Health and Safety Code as:

> "25319.5. Preliminary endangerment assessment means an activity which is performed to determine whether current or past waste management practices have resulted in the release or threatened release of hazardous substances which pose a threat to public health or the environment."

Based on this definition, the PEA has been designed specifically to be the initial TSCP process for evaluating potential hazardous substance release sites. The PEA has three primary objectives. First, the assessment must determine if a release of hazardous substances has or has not occurred at the site. The second objective is to determine if an immediate stabilization action is warranted at the site to mitigate direct threats to public health and the environment posed by a release of hazardous substances or by situations that may result in a release of hazardous substances. In cases when a release of hazardous substances has occurred at a site, a third objective is to determine if the site poses a threat to Public health and the environment and requires remediation.

Private parties are now allowed to participate with the TSCP in conducting initial site evaluations as the result of the passage of Senate Bill 475. This bill added Section 25347.6 to the Health and Safety Code to allow the TSCP to oversee "removal or remedial action" work carried out by private parties on a fee-for-service basis. Activities such as the PEA are, by statutory definition (Health and Safety Code, Section 25322), considered to be within the category of remedial actions. The fee prescribed for the oversight of the PEA in Section 25347.6(d) is $7,500.00.

Pursuant to Section 25347.6, the PEA process has been separated into two distinct phases. The first phase, collection of data and preparation of a PEA report, is the responsibility of the private party requesting that a site be evaluated. The second phase, consisting of evaluation of the data/PEA report and issuance of a determination on the need for cleanup actions at the site, is the responsibility of the TSCP.

The overall roles and responsibilities of the TSCP and private parties in the PEA process are shown on Figure 1. The TSCP staff are responsible for: 1) initiating the billing of the private party by the State Board of Equalization for the $7,500.00 fee; 2) meeting with the private party to explain the PEA process and PEA report requirements; 3) conducting an agency records check and site inspection to familiarize themselves with the site being evaluated; 4) providing guidance to the private party relative to preparation of the PEA report; 5) overseeing any sampling done at the site by the private party; 6) reviewing the PEA report for completeness and

issuance of a determination of completeness; and 7) evaluating the data in the report and making a determination regarding the need for site cleanup actions at the site.

Several options are available to the TSCP staff in making a recommendation based on review of a PEA report. A no "No Further Action" recommendation is made in cases when no release of hazardous substances has occurred and this situation can be clearly documented and in cases when a release has occurred but the site does not present a threat to public health and the environment. In cases where a release has been documented and a threat exists, the recommendation would consist of moving the site forward into characterization and formal remediation. All sites considered to pose a medium to high threat will be required to carry out characterization and remediation activities under direct TSCP oversight. For sites considered to pose a low threat, the private parties will be provided with a list of approved site characterization and remediation procedures and they will be allowed to carry out this work without direct TSCP oversight. Two other recommendations are also possible when contamination exists. A stabilization action may be recommended for sites that pose an immediate threat to public health and the environment. Stabilization may consist of fencing the site, capping the contaminated area, removing degraded containers of hazardous substances, and other similar actions. A final option for a recommendation is to refer cleanup oversight of a contaminated site to another agency. This situation would occur in cases such as when the contamination is associated with a leaking underground storage tank. This sites would be referred because the Regional Water Quality Control Boards (RWQCB) and County Health Departments have been given the lead responsibility in this area Pursuant to Chapter 6.7. Division 20 of the California Health and Safety Code. The site would also be referred if other agencies have already initiated oversight of cleanup operations.

The primary responsibility of a private party in the PEA process is preparation of the PEA report. Specific responsibilities of the private party include: 1) submitting a written request to the TSCP to complete a PEA on a specific site; 2) payment of the $7,500.00 to the to the State Board of Equalization when billed for the fee; 3) meeting with the TSCP staff to receive the PEA Report Manual and to discuss completion of the assessment; 4) preparation of the PEA report in accordance with the specifications provided by the TSCP; and 5) modification of the report if necessary in accordance with a "Notice of Deficiency" issued by the TSCP staff and resubmittal of the report.

Several points regarding preparation of PEA reports need to be emphasized and kept in mind throughout the report preparation process. The primary focus of the reports must be on presenting the site specific data required by the PEA manual as clearly and concisely as possible. Using lists, bulleted outlines, tables and figures are preferable over long discussions. Failure to clearly provide the data required in the initial report will result in issuance of a "Notice of Deficiency" by the TSCP staff subsequent

to review of the report. If the report is not modified and resubmitted within 30 days or if the report is resubmitted in a form that is not responsive to the Notice of Deficiency it will be rejected and the PEA process for the site will be terminated. Reinitiation of the assessment process will require payment of a second $7,500.00 fee.

Since sites will be ranked in accordance with the Uncontrolled Hazardous Waste Site Ranking System; A Users Manual (reference: 40 Code of Federal Regulations, part 300 Appendix A), factors required under the Hazard Ranking System (HRS) are particularly important. The PEA manual provides suggested references for the various information requirements. Use of these references is not mandatory but in the event of conflicting information, these references will be considered authoritative unless a private party can clearly prove otherwise.

It may be appropriate to abbreviate the PEA report in some cases. This situation would occur when Section A, Site History and Description; Section B, Apparent problem; and Section C, Sampling Activities, clearly document that no release of hazardous substances has occurred and no threat of a release exists. In these cases, Section D - Factors Related to Known or Potential Site Contamination, Section E - Analysis of Pathways for Hazard Potential, and Section F Community Assessment may be deleted. If the report is abbreviated, Section G - Conclusions should clearly state the basis for not including Sections D, E and F private parties are encouraged to work closely with the TSCP staff assigned to oversee the data collection effort in preparing the report and when making a decision on not including sections.

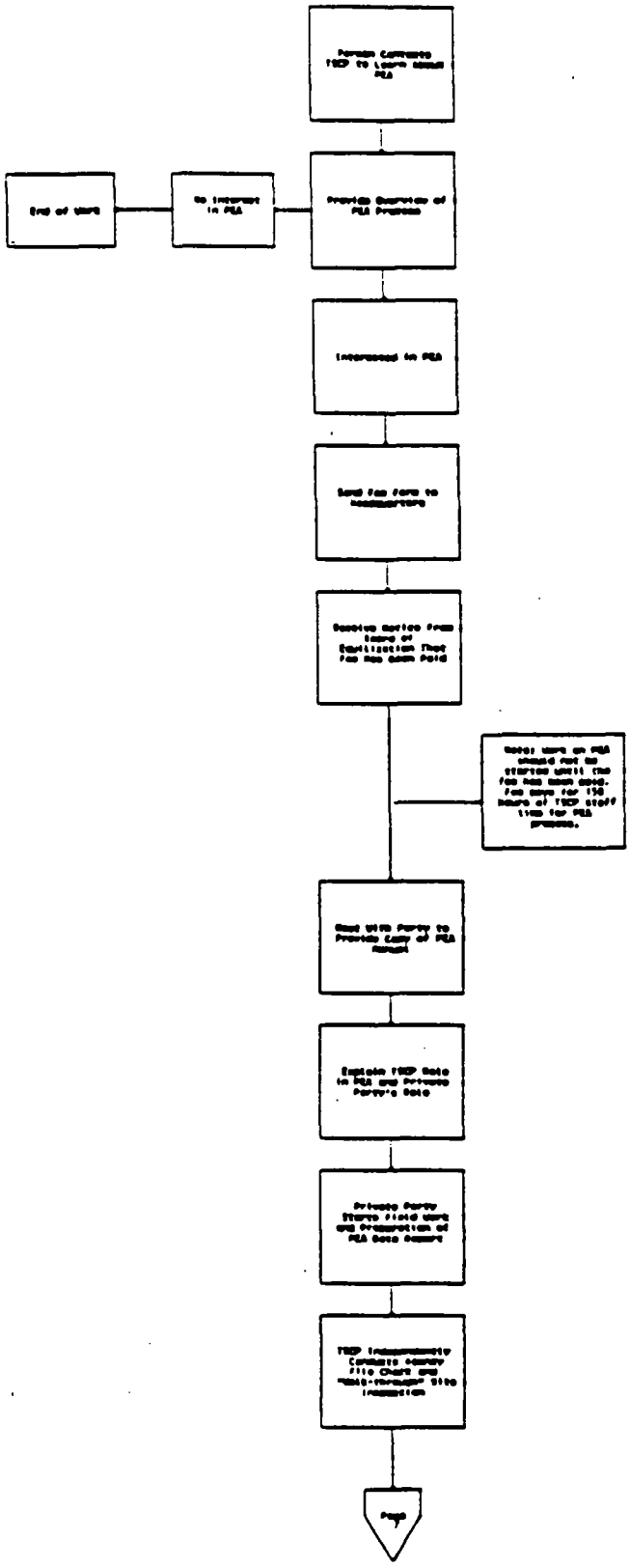

Figure 1
Process Flowchart for Oversight of a
Preliminary Endangerment Assessment

Draft 12/22/89

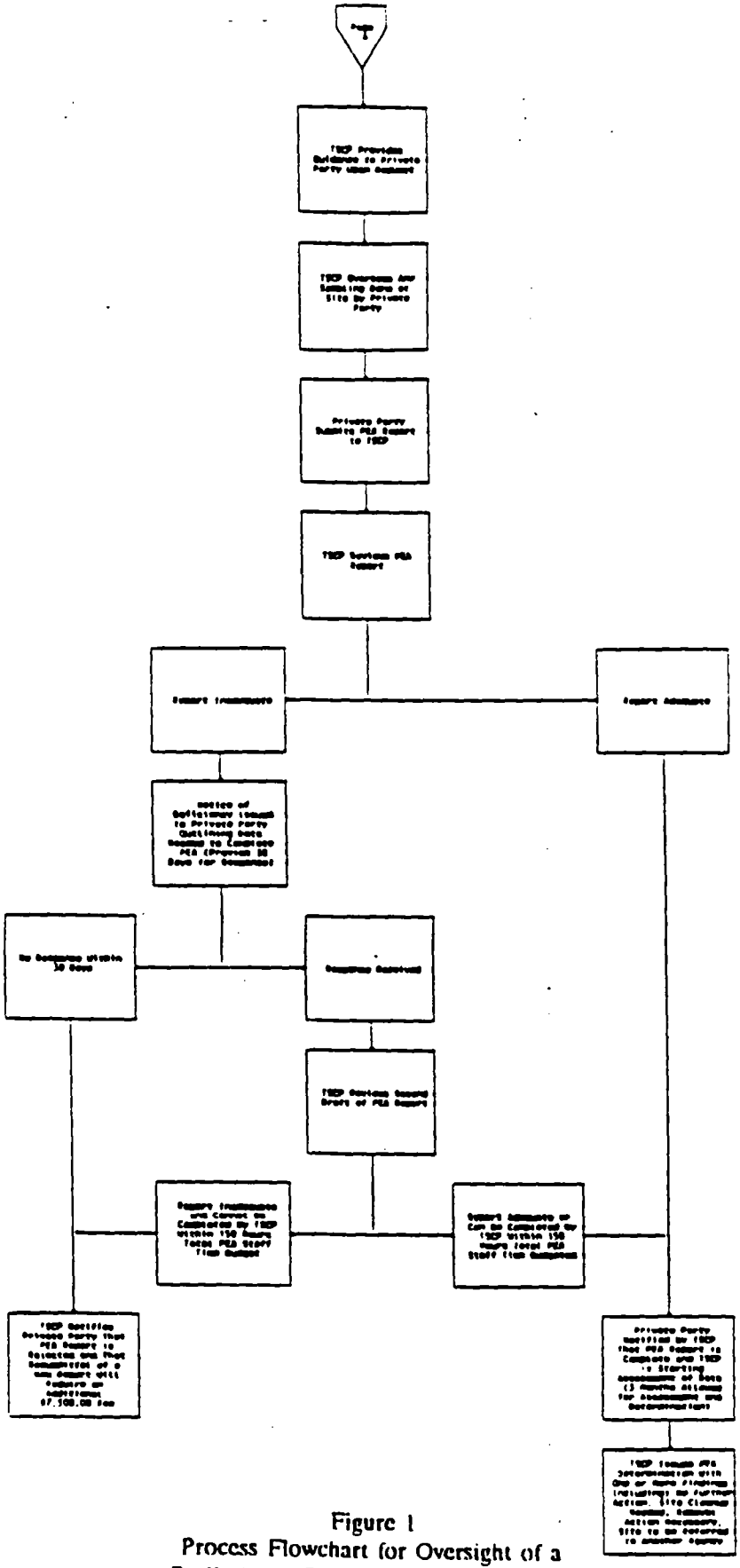

Figure 1
Process Flowchart for Oversight of a
Preliminary Endangerment Assessment

Draft 12/22/89

PRELIMINARY ENDANGERMENT ASSESSMENT CHECKLIST

Section	Location In Report	Adequate/ Inadequate
A. Site History and Description		
- Site Location:		
1) Facility Name	_____	_____
2) Street Address	_____	_____
3) Mailing Address	_____	_____
4) Phone Number	_____	_____
5) Other Names	_____	_____
6) EPA ID Number	_____	_____
7) ASPIS Number	_____	_____
8) Assessor's Parcel Number and Map	_____	_____
9) Township, Section, Range, Meridian	_____	_____
10) Map of Site Location	_____	_____
- Past and Current Site Activities:		
1) Business Type/Years of Operation	_____	_____
2) Facility Ownership/Operators	_____	_____
3) Property Owners	_____	_____
4) Process Description:		
a) Type/quantities of products	_____	_____
b) List of materials/chemicals used	_____	_____

Section		Location In Report	Adequate/ Inadequate
c)	Descriptive overview of process	_____	_____
d)	Map of All Site Features	_____	_____
-	Hazardous Waste Management		
1)	Waste Stream Identification and Waste Quantities	_____	_____
2)	On Site Storage, Treatment, and Disposal:		
a)	Description of storage units	_____	_____
b)	Description of treatment units	_____	_____
c)	Description of disposal practices	_____	_____
d)	Description of containment of storage, treatment, disposal units	_____	_____
e)	Description of recovery/recycling practices	_____	_____
f)	Off-site wastes recovered; origin, type, quantity	_____	_____
3)	Regulatory Status Identification	_____	_____
4)	Agency Inspection Results Summary	_____	_____

B. Apparent Problem

-	Summary of Nature of Contamination at Site	_____	_____

Section	Location In Report	Adequate/ Inadequate
- Summary of Contaminants of Concern	_____	_____
- Justification for "No Further Action" Recommendation	_____	_____
C. Sampling Activities		
- Past Sampling Efforts	_____	_____
- PEA Sampling Efforts	_____	_____
- Analysis of Sampling Results	_____	_____
D. Factors Related to Known or Potential Site Contamination	_____	_____
- Hazardous Substances/Waste at the Site	_____	_____
- Characteristics of Hazardous Substances/Wastes:		
1) Physical State/Color	_____	_____
2) Molecular Weight	_____	_____
3) Specific Gravity or Density	_____	_____
4) Solubility	_____	_____
5) Freezing/Boiling/Melting Points	_____	_____
6) Vapor Pressure	_____	_____
7) Henry's Constant	_____	_____

Section		Location In Report	Adequate/ Inadequate
8)	Flashpoint	_____	_____
9)	Upper and Lower Explosive Limits	_____	_____
10)	NFPA Ignitibility Level Rating	_____	_____
11)	NFPA Reactivity Level Rating	_____	_____
12)	Incompatible Compounds	_____	_____
13)	pH	_____	_____
14)	Toxicity/Persistence Rating	_____	_____

- Exposure Routes and Toxicity:

1)	Exposure Data:		
	a) Description of Exposure Routes	_____	_____
	b) Description of Dispersion Mechanisms	_____	_____
	c) Timing of Releases	_____	_____
2)	Toxicity Data:		
	a) Description of Relative Toxicity	_____	_____
	b) General Toxicological Properties	_____	_____
	c) Standards (RfDs, etc.)	_____	_____

- Soil/Direct Contact Pathways

1)	Description of Soil Contamination and Recommendation	_____	_____
2)	Topography Description	_____	_____
3)	Land Use and Zoning Description	_____	_____

Draft 12/22/89

Section		Location In Report	Adequate/ Inadequate
4)	Description of Environmental Impacts	_____	_____
5)	Hydrologic Soil Group	_____	_____
6)	Description of Soil Permeability	_____	_____
7)	Description of Slope of Site	_____	_____
8)	Description of Soil Stability/Seismic Conditions	_____	_____
9)	Description of Site Accessibility	_____	_____
10)	Description of Containment Measures	_____	_____
11)	Locations of Sensitive Facilities (Schools, etc.)	_____	_____
12)	Locations of Sensitive Habitats	_____	_____
Factors Related to Water Pathways:			
1)	Description of Water Contamination and Remediation	_____	_____
2)	Net Seasonal Perception	_____	_____
3)	Description of Hydrology	_____	_____
4)	For Interconnected Aquifers:		
	a) Distance to Nearest Well	_____	_____
	b) Population Using Water	_____	_____
	c) Irrigated Areas	_____	_____
5)	Aquifers Not Interconnected:		
	a) Distance to Nearest Wells	_____	_____
	b) Population Using Water From Each Aquifer	_____	_____
	c) Irrigated Areas for Each Aquifer	_____	_____

Section		Location In Report	Adequate/ Inadequate
6)	Ground Water Uses	_____	_____
7)	One Year/24-Hour Rainfall	_____	_____
8)	Distance to Nearest Downhill Surface Water	_____	_____
9)	Runoff Flow Distance and Water Intake Locations	_____	_____
10)	Runoff Control Measures	_____	_____
11)	Floodplain Identification	_____	_____
12)	Description of Migration Routes of Substance	_____	_____
13)	Description of Location and Uses of Surface Water Intakes	_____	_____
14)	Population Using/Acres Irrigated From Each Water Intake	_____	_____
15)	Distance to Wetland/Critical Habitat	_____	_____
16)	Sensitive Habitats That May be Affected by Runoff	_____	_____

Factors Related to Air Pathways:

1)	Description of Air Contamination and Remediation	_____	_____
2)	Wind Direction/Velocity	_____	_____
3)	Description of Local Climate	_____	_____
4)	Description of Timing of Release	_____	_____
5)	Description of Dispersion Routes	_____	_____

Draft 12/22/89

Section	Location In Report	Adequate/ Inadequate
6) Populations of Residents/Workers	_____	_____
7) Location/Distance to Sensitive Facilities (Schools, etc.)	_____	_____
8) Location/Distance to Development Areas (Commercial/Industrial, etc.)	_____	_____
9) Description of (Type, Location and Distance) Sensitive Areas (Wetlands, etc.)	_____	_____

E. Analysis of Pathways for Hazard Potential Determination

- Known Hazard:

1) Contaminants Identified	_____	_____
2) Target Populations/Environments Described	_____	_____
3) Effects on Target Populations/Environments Described	_____	_____

- Potential Hazard:

1) Contaminants Identified and Fate Described	_____	_____
2) Potential Populations/Environments Identified	_____	_____
3) Potential Effects on Human/Environmental Targets	_____	_____
4) Uncertainty Factors	_____	_____

- No Potential Hazard:

Section	Location In Report	Adequate/ Inadequate
1) Factors Showing No Hazard Exists	_____	_____
F. Community Assessment		
- Summary of Community Concern	_____	_____
- Concerns/Issues Identified by Locals	_____	_____
- Community Views on Actions at Site	_____	_____
- Recommended Information Repositories	_____	_____
- Names/Addresses of Interested Parties	_____	_____
G. Conclusions		
- Release/Potential Release Identified	_____	_____
- Threat to Public Health/Environment Identified	_____	_____
- Stabilization Action Need Identified	_____	_____

USTEC
U.S. Technical Environmental
Consulting, Inc.

May 21, 1990

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: **19875 PACIFIC GATEWAY DRIVE, HARGIS AND ASSOCIATES - MONTROSE CHEMICAL RESULTS OF MONITORING WELL INSTALLATION. JOB NO. 89007.**

Dear Raul:

We have been notified by a representative of Hargis and Associates, at the request of their client Montrose Chemical Corporation, of the results of the installation of the two monitor wells installed on and adjacent to the Pacific Gateway Drive site. In summary, a substantial amount of a volatile hydrocarbon material was found on the surface of the water table, at a depth of approximately 60 feet, in the wells. This is significant because no similar material occurred in any of the other wells installed in conjunction with the Montrose project. Those other wells are all located in an area to the south of the Carson site.

The presence of this material on the water table directly under the Pacific Gateway Drive site does not imply that a release occurred from the site. It is possible that the material is migrating from a source to the north, which is the upgradient direction.

The results of the work performed for the Montrose project are reported directly to the U.S. Environmental Protection Agency, since the Montrose site is under an EPA consent order. Also in the area within one mile are five other sites where subsurface investigations are being performed, the results of which are also being reported to EPA. In addition, the California DOHS and Regional Water Quality Control Board are also involved.

The result of all of this is that there will probably be EPA and California involvement in the Pacific Gateway Drive site and others to the north. The agencies could request that additional investigations be performed or even that remediation efforts be undertaken.

300 000827

1414 W. Broadway Rd. • Ste. 150 • Tempe, AZ 85282 • Bus: (602) 829-6311 • Fax: (602) 829-6315

Coca-Cola Enterprises - West
Pacific Gateway Drive

Our recommendation is to do nothing with regard to any further environmental work that might be required, until contacted by the respective agencies. However, we do recommend that Coca-Cola not enter into any final agreement with any previous owners of the site at this time.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

Peter A. Beaver
Manager Remedial Services

Steven M. Myers, R.G.
President

/weh

OGDEN ENVIRONMENTAL SERVICES, INC.

POST OFFICE BOX 85178
SAN DIEGO, CALIFORNIA 92138-5178
(619) 455-3045

10955 JOHN JAY HOPKINS DRIVE
SAN DIEGO, CALIFORNIA 92121

January 22, 1990

Mr. Peter A. Beaver
U.S. Technical Environmental
Consulting, Inc.
1414 W. Broadway Road, Suite 150
Tempe, AZ 85282

Subject: Torrance, CA Oily Soil Site

Dear Mr. Beaver:

We have received and reviewed the analytical data you sent me about January 10, 1990 concerning approximately 1600 cubic yards of petroleum hydrocarbon contaminated soil at your client's Torrance, CA site. It is presumed the excavated soil stockpile shown in your Figure 4 is the material of interest.

Based on the data you submitted, it appears the soil is suitable for treatment at our Stockton facility. However, to certify the material as such, the following tests need to be conducted by you to complete the certification. The tests required are as follows:

1. Determination of total concentration of the 17 required metals on four samples from the stockpile. Comparison with Title 22 TTLC and STLC values.

2. If necessary, CalWet tests for comparison to STLC levels for the required metals on four samples.

3. Two more samples for fish bioassay toxicity testing. Only two samples were tested (they passed).

4. If there is reason to believe that any other regulated contaminants such as PCBs, pesticides, herbicides, process wastes, etc. are present, tests must be conducted and meet CA DHS standards.

As discussed in our January 10 telephone conversation, we're in the process of developing our fuel-waste soil treatment pricing structure. At this point, we're expecting our treatment price to be $150.00/T, transportation excluded but certificate of destruction included. We can arrange for trucking or you (or your client) can handle it and the soil can be moved on a Bill of Lading. We expect to begin accepting soil about March 1, 1990 and are ready to accept commitments from generators now.

Our Stockton facility is available now for visitation. May I suggest we meet in person with your client as soon as possible to arrange for us to handle this waste management issue.

Very truly yours,

Robert C. Haney
Sales Manager

RCH/mg

December 15, 1989

Mr. Bob Woods
Analytical Technologies, Inc.
2113 South 48th Street, Suite 107
Tempe, Arizona 85282

RE: **BIO-TOX TESTING RESULTS.**

Dear Mr. Woods:

I would like to request the release of the results of the Biological Toxicity test performed on sample numbers SC-2 and SC-4, collected from our Torrance California facility, to U.S. Technical Environmental Consulting, Inc. Their address is 1414 West Broadway Road, Suite 150, Tempe, Arizona, 85282.

Your cooperation in this matter will be much appreciated.

Sincerely,

U.S. TECHNICAL ENVIRONMENTAL CONSULTING, INC.

J. Edward Todd
Director, Occupational/Environmental Safety

WORK ORDER/CONTRACT
Field Services

TERRA TECH LABS Inc.

An Environmental Testing Service

16371 Gothard Street Suite G
Huntington Beach, CA 92647

(714) 842-6077
Fax (714) 842-1891

TERRA TECH LABS PROJECT NUMBER 1095-2
PO NUMBER N/A
START TIME 10:00 - 10:30
START DATE 9-26-89
CONTACT COMPANY/PERSON Virgil/WTI
SITE PHONE NUMBER N/A 206 43
BILL TO Western Technologies, Inc.
PROJECT NAME Coco-Cola
ADDRESS 3737 E Broadway Rd
P.O. Box 21387, Phoenix, AZ 85036
PROJECT ADDRESS 19875 Pacific Gateway
Torrance, CA
ORDER TAKEN BY: Tom.
DATE OF ORDER 9-25-89
JOB ORDERED BY: Virgil
PERSONNEL Tom.

1	On-site Mobile Laboratory (8 Hours)
1/2	Additional Mobile Laboratory Hours
13	Analysis by EPA Method 418.1 for Total Recoverable Petroleum Hydrocarbons
	Analysis by a Modified EPA Method 8015 for Total Fuel Hydrocarbons
	Analysis by EPA Method 8020 for Volatile Aromatics (BTXE)
	Analysis by a Modified EPA 8015 and EPA 8020 in series
	Engineer/Environmental Specialist (Hours)
	Geotechnician (Hours)
130	brass rings + caps ? U.T.
1	Other hand auger rental.

TERMS AND CONDITIONS: I (we), the undersigned, understand that this document is a binding contract as to all terms and conditions set forth herein. I (we) also acknowlege that it is the responsibility of the client to confirm current prices prior to placing an order for work. A current fee schedule can be obtained by contacting our office. In the event the invoice resulting from this contract is unpaid and legal action results, the prevailing party will be rewarded all reasonable attorney's fees. In addition, it is acknowledged that the above described work has been completed in a satisfactory manner. Payment terms are net 30 days. Debts over 30 days will be subject to a 10% annual interest charge. All discounts are void if payment is not received in 60 days.

Signature Virgil Townsend Date 9-27-89

Company Name Title

TERRA TECH LABS Employee signature and Date Thomas P. Duil 9-26-89

No other personnel on site at time of leaving.

300 000832

WORK ORDER/CONTRACT
Field Services

TERRA TECH LABS Inc.

An Environmental Testing Service

16371 Gothard Street Suite G
Huntington Beach, CA 92647

(714) 842-6077
Fax (714) 842-1891

TERRA TECH LABS PROJECT NUMBER 1095-2 PO NUMBER N/A.

START TIME 7:00 a.m. START DATE 9-27-89

CONTACT COMPANY/PERSON Virgil SITE PHONE NUMBER N/A Van #3

BILL TO Western Technologies Inc. PROJECT NAME Coca-Cola

ADDRESS 4400 MacArthur, 5th Floor PROJECT ADDRESS 4875 Pacific Gateway Dr.

Newport Beach, CA 92600 Torrance CA.

ORDER TAKEN BY: Tom DATE OF ORDER 9-26-89

JOB ORDERED BY: Virgil PERSONNEL Tom.

1 On-site Mobile Laboratory (8 Hours)

4 Additional Mobile Laboratory Hours

47 Analysis by EPA Method 418.1 for Total Recoverable Petroleum Hydrocarbons

___ Analysis by a Modified EPA Method 8015 for Total Fuel Hydrocarbons

___ Analysis by EPA Method 8020 for Volatile Aromatics (BTXE)

___ Analysis by a Modified EPA 8015 and EPA 8020 in series

___ Engineer/Environmental Specialist (Hours)

___ Geotechnician (Hours)

1 Other Hand Auger Rental.

TERMS AND CONDITIONS: I (we), the undersigned, understand that this document is a binding contract as to all terms and conditions set forth herein. I (we) also acknowlege that it is the responsibility of the client to confirm current prices prior to placing an order for work. A current fee schedule can be obtained by contacting our office. In the event the invoice resulting from this contract is unpaid and legal action results, the prevailing party will be rewarded all reasonable attorney's fees. In addition, it is acknowledged that the above described work has been completed in a satisfactory manner. Payment terms are net 30 days. Debts over 30 days will be subject to a 10% annual interest charge. All discounts are void if payment is not received in 60 days.

Signature Virgil Townsend Date 9-27-89

Company Name ___ Title ___

TERRA TECH LABS Employee signature and Date Thomas P. Dail 9-27-89.

300 000833

WORK ORDER/CONTRACT
Field Services

TERRA TECH LABS Inc.

An Environmental Testing Service

16371 Gothard Street Suite G
Huntington Beach, CA 92647

(714) 842-6077
Fax (714) 842-1891

TERRA TECH LABS PROJECT NUMBER 1095-2
PO NUMBER N/A
START TIME 7:00am
START DATE 9-25-89
CONTACT COMPANY/PERSON Virgil
SITE PHONE NUMBER (N/A) Lab #3
BILL TO Western Technologies
PROJECT NAME [illegible]
ADDRESS 4400 MacArthur 5th Floor
Newport Beach CA 92600
PROJECT ADDRESS 19875 [illegible]
Orange CA
ORDER TAKEN BY: [illegible]
DATE OF ORDER 9-24-89
JOB ORDERED BY: Virgil/Tim Beaver
PERSONNEL Tom.

1	On-site Mobile Laboratory (8 Hours)
4	Additional Mobile Laboratory Hours
15	Analysis by EPA Method 418.1 for Total Recoverable Petroleum Hydrocarbons
1	Analysis by a Modified EPA Method 8015 for Total Fuel Hydrocarbons
____	Analysis by EPA Method 8020 for Volatile Aromatics (BTXE)
____	Analysis by a Modified EPA 8015 and EPA 8020 in series
____	Engineer/Environmental Specialist (Hours)
____	Geotechnician (Hours)
____	Other

TERMS AND CONDITIONS: I (we), the undersigned, understand that this document is a binding contract as to all terms and conditions set forth herein. I (we) also acknowlege that it is the responsibility of the client to confirm current prices prior to placing an order for work. A current fee schedule can be obtained by contacting our office. In the event the invoice resulting from this contract is unpaid and legal action results, the prevailing party will be rewarded all reasonable attorney's fees. In addition, it is acknowledged that the above described work has been completed in a satisfactory manner. Payment terms are net 30 days. Debts over 30 days will be subject to a 10% annual interest charge. All discounts are void if payment is not received in 60 days.

Signature Virgil Tavares
Date 9-27-89

Company Name
Title

TERRA TECH LABS Employee signature and Date Thomas P. Dial 9-25-89

No other personnel on-site at time of leaving.

300 000834

DAILY REPO..T OF GRADING OB_ERVATION

STONEY-MILLER CONSULTANTS, INC.
14 HUGHES, SUITE B-101
IRVINE, CA 92718
(714) 380-4886

JOB NO.	CLIENT	DAY	DATE
10221-11	Coca Cola	Friday	9-22

LOCATION	CITY	WEATHER
Pacific Gateway Dr	Torrance	Sunny

GRADING PERMIT NO.	LOT NO.	TRACT NO.

GENERAL LOCATION AND PURPOSE OF FILL
Backfill trenches

GENERAL CONTRACTOR	GRADING OR EARTHWORK CONTRACTOR
Coca-Cola	Ledgeman Co
GENERAL CONTRACTOR'S SUPT.	GRADING CONTRACTOR'S SUPT. OR FOREMAN

SOURCE AND CLASSIFICATION OF FILL MATERIAL	TECHNICIAN	TIME CHARGED	APPROVED BY
	BP	3.0	
VISITORS			

EQUIPMENT USED BY FOR HAULING, FILLING, COMPACTION, WATERING, ETC.
Same as before

LOCATION AND DESCRIPTION OF WORK PERFORMED
Tech arrived onsite mid morning. Contractor is currently finishing the last open trench on N end of property. Tech took one density test with ≥ 90% RC. Contractor will have last lift in around midday. Elevation will be ≥ finished grade. last test could be taken at this elevation during mass grading. fill was processed outside of trench and placed in shallow lifts < 10" and rolled with compactor

AREAS OF ADDITIONAL CONCERN/RETEST

300 000835

PAGE OF

DAILY REPORT OF GRADING OBSERVATION

STONEY-MILLER CONSULTANTS, INC.
14 HUGHES, SUITE B-101
IRVINE, CA 92718
(714) 380-4866

JOB NO. 10221-[illegible]	CLIENT Coca Cola Enterprises	DAY Wednesday	DATE 9-20-89
LOCATION 19875	CITY Pacific Gateway Dr Torrance	WEATHER Sunny	
GRADING PERMIT NO.	LOT NO.	TRACT NO.	

GENERAL LOCATION AND PURPOSE OF FILL
Backfill Trenches

GENERAL CONTRACTOR Coca-Cola	GRADING OR EARTHWORK CONTRACTOR Hedrim
GENERAL CONTRACTOR'S SUPT.	GRADING CONTRACTOR'S SUPT. OR FOREMAN Jim

SOURCE AND CLASSIFICATION OF FILL MATERIAL	TECHNICIAN	TIME CHARGED	APPROVED BY
Native Blends	BO	6.0	
VISITORS			

EQUIPMENT USED BY FOR HAULING, FILLING, COMPACTION, WATERING, ETC.
Same as day before

LOCATION AND DESCRIPTION OF WORK PERFORMED
Tech arrived on site early AM and proceeded to take 3 density tests on fill that was placed in trenches on previous day. Contractor informed tech that work did not commence until Tuesday 9-19-89 so only approximately 1 lift along South edge of site west edge of site and in South west corner. Tech observed placement of fill in trenches and compaction @ most of morning. 3 more density tests were taken along west trench all with ≥ 90% RC. Contractor started working North trench fill was placed in trench trenches and was not processed adequately contractor will have to scarify the lift add water and recompact.

AREAS OF ADDITIONAL CONCERN/RETEST

DAILY REPORT OF GRADING OBSERVATION

STONEY-MILLER CONSULTANTS, INC.
14 HUGHES, SUITE B-101
IRVINE, CA 92718
(714) 380-4888

JOB NO.	CLIENT	DAY	DATE
10221-11	Coca Cola	Tues	9-19-89

LOCATION	CITY	WEATHER
19075 Pacific Gateway Dr	Torrance	Rain / Sunny

GRADING PERMIT NO.	LOT NO.	TRACT NO.

GENERAL LOCATION AND PURPOSE OF FILL

GENERAL CONTRACTOR	GRADING OR EARTHWORK CONTRACTOR
Coca Cola	Ledgang Equipment
GENERAL CONTRACTOR'S SUPT.	GRADING CONTRACTOR'S SUPT. OR FOREMAN

SOURCE AND CLASSIFICATION OF FILL MATERIAL	TECHNICIAN	TIME CHARGED	APPROVED BY
Native	BP	4.0	
VISITORS			

EQUIPMENT USED BY FOR HAULING, FILLING, COMPACTION, WATERING, ETC.
same as day before

LOCATION AND DESCRIPTION OF WORK PERFORMED
Technicians [illegible] in Am due to rain, laborers did not show up one density test [illegible] with ≥ 90% RC contractor is placing a lift [illegible] so technician will return in Am on 9-20-89 to test that lift.

AREAS OF ADDITIONAL CONCERN/RETEST

DAILY REPORT OF GRADING OBSERVATION

STONEY-MILLER CONSULTANTS, INC.
14 HUGHES, SUITE B-101
IRVINE, CA 92718
(714) 380-4886

JOB NO.	CLIENT	DAY	DATE
10221-11	COCA-COLA	THURSDAY	9-21-89

LOCATION	CITY	WEATHER
19875	Pacific Gateway Dr. Torrance	SUNNY

GRADING PERMIT NO.	LOT NO.	TRACT NO.

GENERAL LOCATION AND PURPOSE OF FILL
Trench backfill

GENERAL CONTRACTOR	GRADING OR EARTHWORK CONTRACTOR
Coca cola	LEDSAM Equipment
GENERAL CONTRACTOR'S SUPT.	GRADING CONTRACTOR'S SUPT. OR FOREMAN

SOURCE AND CLASSIFICATION OF FILL MATERIAL	TECHNICIAN	TIME CHARGED	APPROVED BY
NATIVE	KM/BP	9.0	
VISITORS			

EQUIPMENT USED BY FOR HAULING, FILLING, COMPACTION, WATERING, ETC.
SAME

LOCATION AND DESCRIPTION OF WORK PERFORMED

Tech. arrived in A.M. Took density test of fill placed on Wed. (9-20-89) which was ≥ 90 R.C. on the North End of sight. Next lift on N. end did not pass density test. ~~and~~ Fill was removed and reworked. Tests were taken at south & WEST ends of site at finish grade and were > 90% R.C. Tests taken on East side passed the requirement of 90% R.C. or better. Reason for failure of lift on North trench was too thick of a lift of un-uniformly processed material. All failing areas were removed ~~reprocessed~~ reprocessed and replaced, recompacted and retested.

AREAS OF ADDITIONAL CONCERN/RETEST

300 000838

PAGE OF

DAILY REPORT OF GRADING OBSERVATION

STONEY-MILLER CONSULTANTS, INC.
14 HUGHES, SUITE B-101
IRVINE, CA 92718
(714) 380-4886

JOB NO.	CLIENT	DAY	DATE
10221.30	COCA-COLA ENTERPRISES-WEST	SAT	9-16-89

LOCATION	CITY	WEATHER
19875	PACIFIC GATEWAY DR. TORRANCE	CLDY - DRIZZLED

GRADING PERMIT NO.	LOT NO.	TRACT NO.

GENERAL LOCATION AND PURPOSE OF FILL
TRENCH BF

GENERAL CONTRACTOR	GRADING OR EARTHWORK CONTRACTOR
COCA-COLA CO	LEDSAM EQUIPMENT CO
GENERAL CONTRACTOR'S SUPT.	**GRADING CONTRACTOR'S SUPT. OR FOREMAN**
	JIM

SOURCE AND CLASSIFICATION OF FILL MATERIAL	TECHNICIAN	TIME CHARGED	APPROVED BY
ON SITE - VARIOUS TYPES OF SOILS	DEAN S.	8-HRS	
VISITORS			

EQUIPMENT USED BY FOR HAULING, FILLING, COMPACTION, WATERING, ETC.
① SKIPLOADER ① BACKHOE ① TON VIBRO ROLLER

LOCATION AND DESCRIPTION OF WORK PERFORMED

ARRIVED ON SITE IN AM - OBSERVED THE BACKFILL OF THE ABANDONED TRENCH AFTER REMOVING UTILITY LINES. BACKFILL MTL USED IS CLASSIFIED AS SILTY CLAY & CLAYEY SILT. THE MTL WAS TAKEN FROM THE STOCKPILE ADJACENT TO TRENCH (SAME MTL EXCAVATED FROM THE TRENCH PREVIOUSLY).
BACKFILL MTL WAS PROCESSED USING SKIPLOADER AND WAS PLACED IN LIFTS 8" TO 12" ROLLED [illegible] TON VIBRO ROLLER
DENSITY TESTS WERE TAKEN DURING OPERATION.
BACKFILL WAS CARRIED OUT ALONG IN TH TRENCH ALONG PACIFIC LR. MAX DEPTH OF THE TRENCH IS GENERALLY 4½'.
ADDITIONAL REMOVAL OF CONC. RUBBLE IS REQUIRED AROUND THE VALVE AREA.

AREAS OF ADDITIONAL CONCERN/RETEST

J. Blackledge

300 000839

PAGE OF

SOUTHERN CALIFORNIA GAS COMPANY

PIPELINE LOCATION INFORMATION

Gas Company pipelines in the area of your project at 19876 Pa[illegible]

have been located and marked. These locations are approximate only. **State law requires an excavator to determine the exact location of marked facilities by carefully hand digging before using power operated equipment.** "P.E." markings identify plastic gas lines.

Gas lines have been marked and are identified by:

_____ Wooden stake marked with **"G"** (1), or flag placed over the pipeline (2).

_____ Wooden stake marked with **"G"** offset from the pipeline with the offset distance noted on the stake.

X Yellow painted **"G"** on paving, underscored with a line indicating the location and direction of the pipeline.

_____ Yellow painted **"G"** on paving, underscored with a line indicating the direction of the pipeline, and offset from pipeline with the offset distance also shown on the paving.

X Other No gas facilities involved

_____ **Transmission Line:** Notice is required 48 hours prior to excavating or grading. We require a Company representative on the job site (at no cost to you) when there is work activity near high pressure gas lines.

Please call _____

If you are unable to find the marked gas lines within 24" of either side of the indicated location, or if the pipe coating becomes damaged, please call the following number so that we can provide additional assistance and/or repair the damaged pipe coating:

781-8475 (Dispatch)

If you damage the pipe and gas is leaking, please call the above number immediately. Do not attempt to repair the leak. Extinguish all sources of ignition and warn people from the area. Call fire and police agencies and evacuate nearby buildings as necessary.

[illegible] — Gas Company Representative — Date 9-15-[illegible]

Received By (Print)

[illegible] — Received By (Signature) — Date 9-1-[illegible]

SOUTHERN CALIFORNIA GAS CO. 5153A

300 000840

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

0639-02591

August 29, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: SCHEDULE FOR REMEDIATION, 19875 PACIFIC GATEWAY DRIVE. JOB NO. 2179J286.

Dear Raul:

Following is a summary of the timeline for providing you with written documentation for work on the subject site.

The following items are planned for the dates stated:

August 25 - collect bulk samples from site.

August 28 to September 5 - trace and remove abandoned underground piping.

September 1 - preliminary work plan due outlining treatment options.

September 5 to September 11 - tentatively receive grading permits and cut western area to rough grade.

September 8 - conceptual work plan due including preliminary cost estimate.

September 11 to September 29 - excavation of contaminated areas and confirmatory sampling.

September 22 - final design for treatment operation.

October 2 - begin treatment operation at site. (Pending regulatory approvals.)

The above dates are the earliest occurrence for the specific items. The timeline may be slipped to accommodate construction with no adverse effects.

Coca-Cola Enterprises - West
Job No. 2179J286

We will be in contact with you to set up the pipeline tracing and removal and to review the qualifications and training of the excavation contractor.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

August 28, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: LINE LOCATING SERVICE.

Dear Raul:

We have located a line locating service contractor to trace and mark the location of any buried steel pipelines that may still be on the Pacific Gateway Drive site.

They are available on August 30 or September 5, 1989. The cost to you would not exceed $1,500.00.

Please advise as to your desires. Also, we have identified a qualified contractor to excavate and remove all the lines.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

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FINAL REPORT DUE ON OR BEFORE:

WORD PROCESSING REQUEST FORM

PLEASE KEEP THIS FORM WITH DOCUMENT

Peter B. Ext. 309

Author

Type and Title of Document

217

Department

letter

Project Number

Coca-Cola

Project Name

	Date and Time Submitted	Date and Time Needed	Clerical Time Spent
1st Draft	8/29		.5
2nd Draft			
3rd Draft			
4th Draft			
FINAL			

RUSH ☐ Reason:

OVERTIME AUTHORIZATION ☐

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DOCUMENT REVIEW SIGN-OFF SHEET

TASK: Coca-Cola letter COMPLETION DATE:

REVIEW FUNCTION	DATE RECEIVED	DATE COMPLETED	COMMENTS
Project Engineer			
Technical Reviewer			
Peer Reviewer			
Project Manager			
R.A. Manager			
Quality Assurance			
Director			
Vice President			

NOTE: Please sign and date after final review, or state status of review.

August 29, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: PIPELINE TRACING, PACIFIC GATEWAY BOULEVARD.

Dear Raul:

This letter concerns the abandoned pipelines on the subject site. We recommend tracing and removal in the following fashion:

1. Determine if excavation contractor is qualified and trained to work on the site in the presence of hazardous materials.

2. Excavate and remove those pipelines already identified with contractor providing materials and personnel to contain any pipeline contents.

3. Survey the site for any other unidentified pipelines by the use of an underground utility locating service.

4. Remove those additional lines identified.

5. Backfill trenches and compact to satisfy overall requirements.

6. If any pipelines enter areas where contaminated soil material is present, that material will be set aside for treatment.

The costs to supervise this work will be approximately $500.00/day. The locating service would sweep the entire site for $1,500.00. If you desire for WTI to provide the excavation, removal, and possible material containment, costs for this can be provided.

Coca-Cola Enterprises - West

Please let us know at your earliest convenience how you wish to proceed.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

August 24, 1989

Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: 19875 PACIFIC GATEWAY DRIVE. JOB NO. 2179J286.

Dear Raul:

This letter serves to document the deliverables pertaining to the subject site that Gary Carlin of Stoney-Miller Consultants agreed to provide.

1. Formalized boring logs and geologic cross sections for the areas of the site where contamination remains in place.

2. A letter report describing the location of sampling and results of clearing analysis for the area in the NW corner of the site where excavation has already been performed.

3. Aerial photographs and any other raw data that might pertain to historical uses of the site.

4. A review of the chromatograms generated during the chemical analyses of the contaminated soil. This should be conducted to determine, in the opinion of a trained analytical chemist, if the material found in the various areas of the site exhibit any confirmable similarities.

Coca-Cola Enterprises - West
Job No. 2179J286

We appreciate the time you could spend with us yesterday, and are working towards the timely completion of this project.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

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WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
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Peter A. Beaver
Senior Project Manager
Environmental Engineering Services

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh

ENVIRONMENTAL APPLICATIONS, INC.

August 21, 1989
EA File No. S-89-080

Steven M. Myers, R.G.
Director, UST & Groundwater Services
Western Technologies Inc.
3737 East Broadway Road
PO Box 21387
Phoenix, Arizona 85036

Re: Coca-Cola Facility
Torrance, California
Contaminated Soil
Remediation Work Plan

Dear Steve:

In accordance with our recent conversations, Environmental Applications, Inc. (EA) is pleased to provide you with this Work Plan to remediate petroleum contaminated soils at Coca-Cola's Torrance facility. The purpose of this Work Plan is to identify design/construction issues for a below-grade treatment cell and the above-grade system components. It is our understanding that Western Technologies Inc. (WTI) has reviewed the available laboratory analytical data and believes bioremediation to be applicable to the contaminants identified at the site.

Preliminary design plans for the treatment cell are focused on maximizing fluid flux and treatment flexibility while limiting the cell volume. The contaminated soil will be isolated between layers of crushed stone which will contain the permeant distribution/collection system. Based on WTI's contaminated soil volume estimate of 5,000 yd^3 with a permeability of $1x10^{-6}$ cm/sec and a flow rate of 0.1 gpd/ft^2 of contaminated soil surface area, the cell volume is approximately 27,000 yd^3. While the on-site space available for construction will accommodate a cell of this size, additional field investigations aimed at accurately determining contaminated soil volumes coupled with laboratory testing to determine permeability and acceptable permeant flux may decrease the cell volume. As such, EA is proposing the following Work Plan.

Copyright 1989 Environmental Applications, Inc.

Tank Management/Environmental Remediation Services/Construction Management
335 Bear Hill Road Waltham, MA 02154 617-890-3922
An Equal Opportunity Employer M/F/V/H

WORK PLAN

The Work Plan is divided into the seven tasks described below.

TASK 1.0 - ADDITIONAL FIELD INVESTIGATION

WTI will perform additional field investigations to determine the total volume of contaminated soil at the site. During the course of their investigations, WTI will collect representative samples of the contaminated soil strata for laboratory testing by EA.

TASK 2.0 - LABORATORY TESTING

The laboratory testing program will focus on both the biological and physical properties of the contaminated soil. It is our understanding that WTI will be responsible for investigating the feasibility and operating parameters of the bioremediation process within the soil matrix.

EA will conduct geotechnical testing to determine the contaminated soil characteristics and permeability. Following the laboratory testing, WTI and EA will discuss the results of the program and determine the appropriate treatment approach.

TASK 3.0 - TREATMENT CELL DESIGN

EA will complete the treatment cell design following the laboratory testing program. The treatment cell will be designed to limit the overall size of the below grade components while providing a uniform flow field through the contaminated soil. Treatment flexibility such as redundant and/or multi-purpose distribution and collection systems will be incorporated in the design. All below-grade components shall be chemically resistant to the contaminants identified at the site and to the permeant employed as part of the remediation efforts. In addition, the structural integrity of the cell will not adversely affect the above-grade use of the area (ie. parking and vehicle traffic). The design will be reviewed by WTI to assure compliance with the State of California Construction Standards for a Class II Surface Impoundment.

TASK 4.0 - CONSTRUCTION MANAGEMENT

EA will provide construction management during installation of the below-grade cell to insure compliance with the project design documents.

TASK 5.0 - TREATMENT SYSTEM DESIGN

Based on the results of WTI's and EA's laboratory programs, EA will design the above-grade treatment system components.

TASK 6.0 - TREATMENT SYSTEM INSTALLATION

EA will fabricate and install the treatment system at a predetermined location at the site. It is our understanding that WTI and/or Coca-Cola will be responsible for obtaining all the necessary installation and operating permits required by the state prior to system installation.

TASK 7.0 - START-UP/FULL SCALE OPERATION

Following installation of the above-grade components, WTI and EA will conduct start-up and initial operation of the treatment system to insure optimum performance.

We trust that this Work Plan is acceptable to both WTI and Coca-Cola. However, should you have any questions please contact us at your convenience. We are looking forward to working with WTI on this interesting project.

Very truly yours,

ENVIRONMENTAL APPLICATIONS, INC.

Mikhail Schiller, Sc.D.,P.E.
Senior Project Manager

Carl L. Eidam
President

August 21, 1989

WORK PLAN OUTLINE

TORRANCE SITE

Four likely scenarios for remediation of the contaminated soil have been identified. They are:

1. Remove and bioremediate off site at a permitted facility.

2. Perform additional sampling and analyses for transport out of state as non-hazardous waste.

3. Conduct on site physical processing of the material for transport off site to an asphalt plant which will blend the soil into an asphalt product.

4. Construct a subsurface lined cell and conduct bioremediation on site. A detailed description follows:

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

August 16, 1989

Mr. Clarence Geick
B.K.K. Corporation
2550 237th Street
Torrance, CA 90505

RE: BIOREMEDIATION OF SOIL

Dear Mr. Geick:

I appreciate the time you spent on the 14th discussing the possibility of performing bioremediation of soil on one of your sites that might be licensed for such an activity.

Following is a brief description of what we had envisioned. Please review this to see if the concept is of further interest.

Our client has acquired a site in Torrance where soil contaminated by heavy hydrocarbon components is present. All the contamination was supposedly removed from the site, but some was missed and remains. The quantity of concern is approximately 4000 cubic yards, measured in place. Chemical analysis of soil samples obtained from boring shows no PCB's or volatile organic compounds detectable. Attached to this letter are some of the results of analysis.

The client desires to make use of the site by beginning to construct their proposed facility. During this work, they will be able to excavate the contaminated material. The material is amenable to bioremediation, however, the constraints of the project do not allow the time or space to conduct any treatment on site. Therefore, one option is to investigate the possibility that a licensed site would be available where a portion could be "rented" to conduct the bioremediation. The client would fully expect to pay for any efforts expended to achieve the necessary regulatory clearance, the use of the site and any operations carried out on the site.

The time required to complete the treatment would depend on the space available. Material could be stockpiled in the interim.

Western Technologies has staff experienced in bioremediation technologies, but could utilize the services of the staff or equipment available at the site for earth moving activities if this was desireable from your standpoint.

We would appreciate your timely consideration of this proposed scenario, as our client wishes to initiate construction in the near future.

Sincerely,

WESTERN TECHNOLOGIES INC.

Peter Beaver
Senior Project Manager
Environmental Engineering Services

/gg

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS · MICROBIOLOGISTS · ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE 4 Soil samples Project: Torrance LABORATORY NO.

INVESTIGATION Total Petroleum Hydrocarbons (418.1)

Sample I.D.	RESULTS Concentration mg/kg
E-1,2'	24
E-2',3'	2,760
E-5,2'	1,340
E-4,4'	279

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Greg W. Everett
Project Manager

This report applies only to the sample or samples investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

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CABLE: TRUELABS

CLIENT

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE E-1,2'

LABORATORY NO.

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Phenol	1.98 mg/kg	ND
bis(2-Chloroethyl) ether	1.98 mg/kg	ND
2-Chlorophenol	1.98 mg/kg	ND
1,3-Dichlorobenzene	1.98 mg/kg	ND
1,4-Dichlorobenzene	1.98 mg/kg	ND
Benzyl Alcohol	3.90 mg/kg	ND
1,2-Dichlorobenzene	1.98 mg/kg	ND
2-Methylphenol	1.98 mg/kg	ND
bis(2-Chloroisopropyl) ether	1.98 mg/kg	ND
4-Methylphenol	1.98 mg/kg	ND
N-Nitroso-Di-N-propylamine	1.98 mg/kg	ND
Hexachloroethane	1.98 mg/kg	ND
Nitrobenzene	1.98 mg/kg	ND
Isophorone	1.98 mg/kg	ND
2-Nitrophenol	1.98 mg/kg	ND
2,4-Dimethylphenol	1.98 mg/kg	ND
Benzoic Acid	9.90 mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98 mg/kg	ND
2,4-Dichlorophenol	1.98 mg/kg	ND
1,2,4-Trichlorobenzene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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June 26, 1989

Constituent	Approximate Detection Limit*		Concentration** Micrograms/Kilogram
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

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Laboratory Number:
June 26, 1989
Page three

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Chrysene	1.98 mg/kg	ND
Di-n-octyl phthalate	1.98 mg/kg	ND
Benzo(b)fluoranthene	1.98 mg/kg	ND
Benzo(k)fluoranthene	1.98 mg/kg	ND
Benzo(a)pyrene	1.98 mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98 mg/kg	ND
Dibenz(a,h)anthracene	1.98 mg/kg	ND
Benzo(g,h,i)perylene	1.98 mg/kg	ND

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Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Greg W. Everett
Project Manager

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TRUESDAIL LABORATORIES, INC.

CHEMISTS · MICROBIOLOGISTS · ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

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TUSTIN, CALIFORNIA 92680
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AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE E-2,3'

LABORATORY NO

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Phenol	1.98 mg/kg	ND
bis(2-Chloroethyl) ether	1.98 mg/kg	ND
2-Chlorophenol	1.98 mg/kg	ND
1,3-Dichlorobenzene	1.98 mg/kg	ND
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Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett

Greg W. Everett
Project Manager

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS · MICROBIOLOGISTS · ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

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CLIENT

DATE June 26, 1989

RECEIVED June 21, 1989

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2-Nitrophenol	1.98 mg/kg	ND
2,4-Dimethylphenol	1.98 mg/kg	ND
Benzoic Acid	9.90 mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98 mg/kg	ND
2,4-Dichlorophenol	1.98 mg/kg	ND
1,2,4-Trichlorobenzene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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Laboratory Number:
June 26, 1989

Constituent	Approximate Detection Limit*		Concentration** Micrograms/Kilogram
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Laboratory Number:
June 26, 1989
Page three

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Chrysene	1.98 mg/kg	ND
Di-n-octyl phthalate	1.98 mg/kg	ND
Benzo(b)fluoranthene	1.98 mg/kg	ND
Benzo(k)fluoranthene	1.98 mg/kg	ND
Benzo(a)pyrene	1.98 mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98 mg/kg	ND
Dibenz(a,h)anthracene	1.98 mg/kg	ND
Benzo(g,h,i)perylene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Greg W. Everett
Project Manager

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE E-4,4'

LABORATORY NO

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Phenol	1.98 mg/kg	ND
bis(2-Chloroethyl) ether	1.98 mg/kg	ND
2-Chlorophenol	1.98 mg/kg	ND
1,3-Dichlorobenzene	1.98 mg/kg	ND
1,4-Dichlorobenzene	1.98 mg/kg	ND
Benzyl Alcohol	3.90 mg/kg	ND
1,2-Dichlorobenzene	3.90 mg/kg	ND
2-Methylphenol	3.90 mg/kg	ND
bis(2-Chloroisopropyl) ether	3.90 mg/kg	ND
4-Methylphenol	3.90 mg/kg	ND
N-Nitroso-Di-N-propylamine	3.90 mg/kg	ND
Hexachloroethane	3.90 mg/kg	ND
Nitrobenzene	3.90 mg/kg	ND
Isophorone	3.90 mg/kg	ND
2-Nitrophenol	3.90 mg/kg	ND
2,4-Dimethylphenol	3.90 mg/kg	ND
Benzoic Acid	9.90 mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98 mg/kg	ND
2,4-Dichlorophenol	1.98 mg/kg	ND
1,2,4-Trichlorobenzene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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Laboratory Number:
June 26, 1989
Page two

Constituent	Approximate Detection Limit*		Concentration** Micrograms/Kilogram
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Laboratory Number:
June 26, 1989
Page three

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Chrysene	1.98 mg/kg	ND
Di-n-octyl phthalate	1.98 mg/kg	ND
Benzo(b)fluoranthene	1.98 mg/kg	ND
Benzo(k)fluoranthene	1.98 mg/kg	ND
Benzo(a)pyrene	1.98 mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98 mg/kg	ND
Dibenz(a,h)anthracene	1.98 mg/kg	ND
Benzo(g,h,i)perylene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Greg W. Everett
Project Manager

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS · MICROBIOLOGISTS · ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT

DATE June 16, 1989

RECEIVED June 6, 1989

SAMPLE Soil Sample
Project: Near G-3, 6/05/89, 2:25 PM

LABORATORY NO.

INVESTIGATION EPA 418.1 for Total Petroleum Hydrocarbons

RESULTS

Parameter	CONCENTRATION, mg/L
Total Petroleum Hydrocarbons (418.1)	60.4

Respectfully submitted,

TRUESDAIL LABORATORIES, INC.

Gregory W. Everett,
Project Manager
Watter & Waste Laboratory

300 000628

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REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS · MICROBIOLOGISTS · ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT

DATE June 16, 1989

RECEIVED June 6, 1989

SAMPLE Soil Near G-3
Project: Torrance,

LABORATORY NO.

INVESTIGATION

Purgeable Organics (Volatiles) by EPA 8240
Gas Chromatography/Mass Spectrometry

RESULTS

Constituent	Detection Limit* (mg/kg)	Concentration** Milligrams/Kilogram
Acetone	0.300	ND
Benzene	0.300	ND
Bromodichloromethane	0.300	ND
Bromoform	0.300	ND
Bromomethane	0.300	ND
2-Butanone	0.300	ND
Carbon Disulfide	0.300	ND
Carbon Tetrachloride	0.300	ND
Chlorobenzene	0.300	ND
Chloroethane	0.300	ND
2-Chlorethyvinyl ether	0.300	ND
Chloroform	0.300	ND
Chloromethane	0.300	ND
Dibromochloromethane	0.300	ND
1,1-Dichloroethane	0.300	ND
1,2-Dichloroethane	0.300	ND
1,1-Dichloroethene	0.300	ND
trans-1,2-Dichloroethene	0.300	ND
1,2-Dichloropropane	0.300	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

This report applies only to the sample or samples investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public, and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used in whole or in part in any advertising or publicity matter without prior written authorization from these Laboratories.

Constituent	Detection Limit* (mg/kg)	Concentration** Milligrams/Kilogram
cis-1,3-Dichloropropene	0.300	ND
trans-1,3-Dichloropropene	0.300	ND
Ethyl Benzene	0.300	ND
2-Hexanone	0.300	ND
4-Methyl-2-pentanone	0.300	ND
Methylene Chloride	0.300	ND
Styrene	0.300	ND
1,1,2,2-Tetrachloroethane	0.300	ND
Tetrachloroethene	0.300	ND
Toluene	0.300	ND
1,1,1-Trichloroethane	0.300	ND
1,1,2-Trichloroethane	0.300	ND
Trichloroethene	0.300	ND
Vinyl Acetate	0.300	ND
Vinyl Chloride	0.300	ND
Xylenes	0.300	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett
Project Manager

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036

RECORD OF

☒ TELECON
☐ MEETING

Project Name	Number	Phase	Task	Subtask
TORRANCE-COKE				

Date: 8/11/89
Time: 3:00 PM

CALL FROM ☒ CALL TO ☐ NAME: R. BEAVER

Other Participants — Name/Location/Representing:

CALL FROM ☐ CALL TO ☒ NAME: JOHN WESNOUSKY

Telephone Number: 916-322-2822

Company Name: CA. DEPT. OF HAZARDOUS SERVICES

Address: P.O. BOX 94732 ALT. TECHNOLOGY DIV.

Topic: PERMITTING OF ALTERNATIVE TECHNOLOGY

City: SACRAMENTO

State: CA

Zip Code: 94234-7320

Summary (Decisions & Specific Actions Required by Named Persons):

RON LEWIS

I DISCUSSED THE CONCEPT OF THE BIO-TREATMENT CELL ON A GENERIC BASIS.

DOHS HAS BEEN APPROACHED WITH SIMILAR SCHEMES BEFORE. THEY HAVE APPROVED THE ONES WHERE THE CONTAINMENT WAS GOOD AND THE PROPOSED TREATMENT SEEMED REASONABLE. THEY REJECTED THE ONES WHERE GROUNDWATER WAS NEAR TO THE CONTAMINATION.

IN OTHER WORDS, IF WE CONSTRUCT A TRUE RCRA CELL (DOUBLE SYNTHETIC LINER) THEY WOULD ALLOW ALMOST ANY PROPOSED TREATMENT METHOD.

THEY WOULD PERMIT THIS TYPE OF WORK UNDER A R&D VARIANCE. IT COULD TAKE SEVERAL MONTHS TO RECEIVE THIS.

IF WE WENT IN FOR A CELL DESIGN THAT WAS LESS PROTECTIVE, THEIR REVIEW WOULD TAKE LONGER.

→ FOLLOW UP: WE NEED TO SECURE A VARIANCE FROM REGIONAL DOHS TO PERFORM ANY PHYSICAL WORK ON SITE (IN THEORY).

Required Action:

Prepared by (Signature):

Distribution:
Original to Project File
Copy to Project Manager
Copy to Preparer

☐ Other Distribution (By Preparer)

PAGE ___ OF ___

548A-6-87

300 000631

TREATMENT CELL DESIGN PARAMETERS

(REVISED)

1. SITE

   A. Proposed location of cell and use of area. Parking, landscaped, loading dock, etc. i.e. Geotechnical design criteria for subgrade.

   B. GW elevation at site of cell - NOTE: use of area is related to cell size and soil type. That is if permeability of soil is low and dense, subgrade is required (high compaction) then the depth of the cell may be decreased thus increasing the surface.

2. SOIL

   A. Classification (sieve, hydrometer, & Attleberg Limits) of the contaminated soils. Sample should be representative mixture of <u>all</u> soils to be included in the cell for treatment.

   SIEVE - TRI-AXIAL PERMEABILITY SATURATED

   B. Permeability of compacted saturated soil.

   C. California Bearing Ratio (CBR) of the (soaked) compacted sample. Test may be required by the contractor to determine suitability of the soil for parking area subgrade. This may not be necessary if the cell is to be constructed in a low use or landscaped area. May not be necessary depending on soil classification.

   MOISTURE

NOTES:

Procedure should be something like:

1. Determine optimum H^2O% for the desired geotechnical design. (Proctor)
2. Saturate sample, determine expansion and pressure via CBR.
3. Perform permeability test on column of compacted soil.

Permeability studies, performed in-situ, may not accurately represent the mixed and compacted soils to be included in the cell (fractures, if any, in the clay/silty soil may indicate higher permeability than what would be installed in the cell).

D. Oxygen consumption by the microorganisms with time. This will affect the design thickness of the contaminated soil within the cell.

May be possible if we can add nutrients of gaseous form, we may be able to do it without adding water. Requires co-ordination with WTI Bio-Engineer.

ENVIRONMENTAL APPLICATIONS, INC.

FILE NO.: _____

DATE SENT: 8/10/89

TIME SENT: 11:00

VERIFIED TRANSMISSION: _____
(INITIALS)

FAX COVER LETTER

TO: Tony Hall

FROM: [illegible]
Environmental Applications, Inc.
Waltham, MA 02154

FAX NO: _____

FAX NO: 617-890-3918

RE: REVISED DATA NEEDS

TOTAL NO. OF PAGES (INCLUDING THIS COVER LETTER): 3

IF THERE ARE ANY PROBLEMS PLEASE CONTACT [illegible]
AT 617-890-3922

COMMENTS: _____

8-10-89
JCF
Torrence CA

TREATMENT CELL DESIGN PARAMETERS

1. SITE

a. Proposed location of cell and use of area. (Parking, landscaped, loading dock, etc. ie. Geotechnical design criteria for subgrade.

b. GW elevation at site of cell
NOTE use of area is related to cell size and soil type. That is if permeability of soil is low and dense subgrade is required (high compaction) then the depth of the cell may be decreased thus increasing the surface.

2. SOIL

a. Classification (Gradation & Attleberg Limits) of the contaminated soils. Sample should be representative mixture of <u>all</u> soils to be included in the cell for treatment.

b. Permeability of compacted soil soil

c. California Bearing Ratio (CBR) of the (soaked) compacted sample. Test may be required by the contractor to determine suitability of the soil for parking area subgrade. This may not be necesary if the cell is to be constructed in a low-use or landscaped area.

NOTES
Procedure should be something like:
1. Determine optimum H2O% for the desired geotechnical design. (Proctor)
2. Saturate sample, determine expansion and pressure via CBR
3. Perform permeability test on column of compacted soil

Permeability studies, performed in-situ may not accurately represent the mixed and compacted soils to be included in the cell (fractures in the clayey/silty soil may indicate higher permeability than what would be installed in the cell)

d. Oxygen consumption by the microorganisms with time. This will affect the design thickness of the contaminated soil within the cell.

SPECTRUM E.S.I.

ENVIRONMENTAL SUBSURFACE INVESTIGATIONS

10 August 1989

Western Technologies
3737 E. Broadway Road
Phoenix, AZ 85036
Mr. Peter Beaver

RE: Proposal for line location.

Dear Mr. Beaver:

Spectrum Environmental Services, Inc. is pleased to submit the following estimated costs to conduct an investigation to determine the possible location of metallic subsurface lines on a previous refinery operations property in Torrance, CA. It is our understanding that the area to be surveyed is level, free of debris and vegetation and is approximately 1 to 1 1/4 acres.

Our approach to this investigation will be to delineate the surface trace of all locatable lines using electromagnetic conduction and induction techniques. The surface trace of the lines will be marked in the field with spray paint using standard color-coding.

Below are the estimated costs to conduct this investigation:

Item	Rate	Costs
7 hrs Travel/Labor	Travel/Labor at $175/hr	$1225.00

This cost is an estimate only. A firm fixed cost is available at 120% of the estimate total or $1470.00. We look forward to working with Western Technologies on this project. Please call if I may be of further service, or answer any questions.

Sincerely,

Judy LeTourneau
President

300 000636

12423 GLADSTONE AVE., SUITE 5, SYLMAR, CA 91342 (818) 365-9371 / FAX: (818) 361-1680
P.O. BOX 2728, FREMONT, CA 94536-0728 (415) 793-7472 / FAX: (415) 793-1326

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
(602) 437-3737

DRAFT

July 25, 1989

Mr. Raul Ramirez
Coca-Cola Enterprises - West
1334 South Central Avenue
Los Angeles, California 90021

RE: TORRANCE, CALIFORNIA FACILITY. JOB NO. 2179J286.

Dear Raul:

As a result of our July 20 meeting in your office, WTI is recommending the construction of an on-site treatment cell to remediate the contaminated soil identified at the proposed Torrance, California facility. While not the least expensive of the three options presented, it is WTI's opinion that this technology will remediate the site and present the least liability to Coca-Cola.

Due to the complexity of this remedial process, we recommend that WTI assume the responsibility for the remediation portion of this project. We feel that your present consultant, Stoney-Miller Consultants, is well suited for the geotechnical and/or materials testing portion of the project.

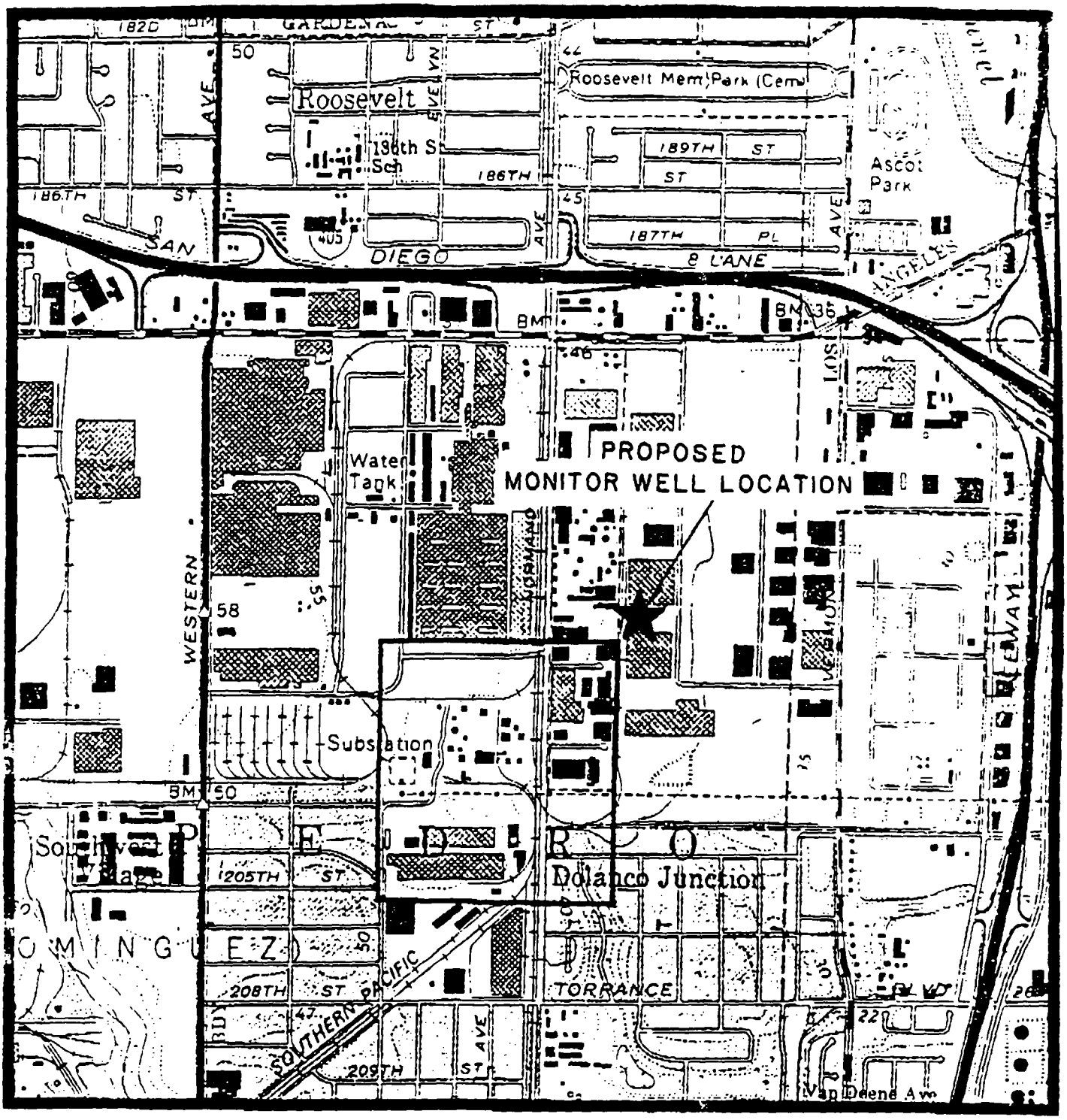
As always it is a pleasure to be of service to you and CCE - West. If you have any questions or require additional information, please call me at (602) 437-3737 ext. 315.

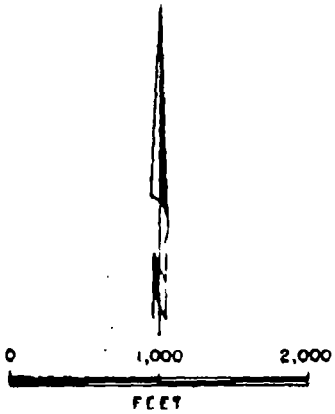
Sincerely,

WESTERN TECHNOLOGIES INC.

Steven M. Myers, R.G.
Director, UST and Groundwater Programs
Environmental Engineering Services

/weh





MONTROSE, CALIFORNIA
TORRANCE, CALIFORNIA

APPROXIMATE LOCATION
OF STUDY AREA

HARGIS + ASSOCIATES, INC
Consultants in Hydrogeology
San Diego, California

7/89

FIGURE 1

...RED BY _____ REVIEWED BY _____

300 000645

300 000646

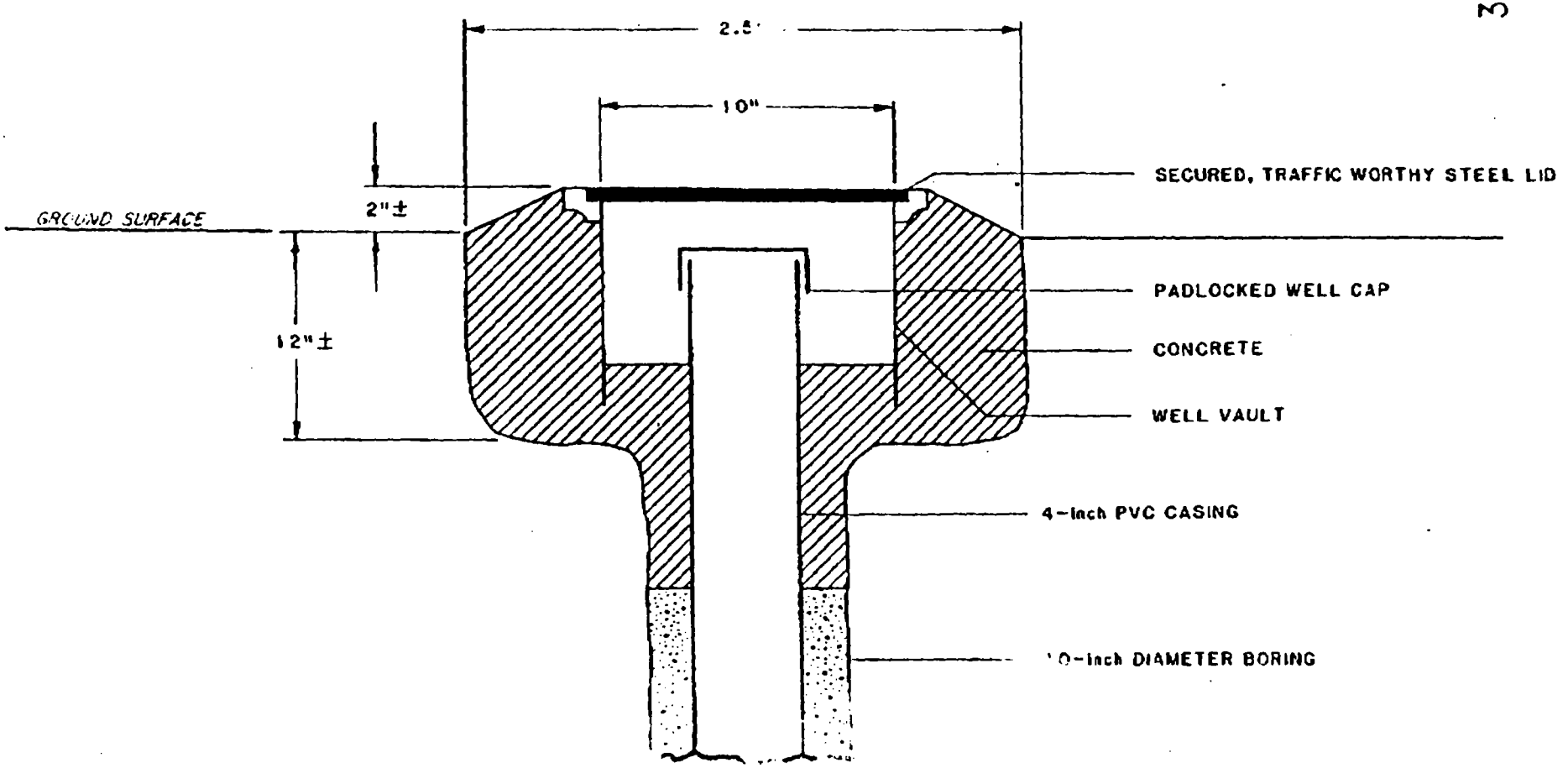


FIGURE 2. CROSS SE

HARGIS + ASSOCIATES, INC.

Mr. Matt Fanoe
July 18, 1989
Page 2

Routine future access to the monitor well to collect groundw..er samples will also be necessary. Coca-Cola Bottling Company will be given ample notice before any sampling activities take place.

Hargis + Associates, Inc. will telephone you later this week to confirm receipt of this letter and to further discuss this matter. If you have any questions in the interim, please contact Roger Niemeyer, Matthew Wiedlin, or myself. Hargis + Associates, Inc. looks forward to cooperating with you on with matter.

Sincerely,

HARGIS + ASSOCIATES, INC.

Matthew Wiedlin for

Rush N. Boynton
Hydrogeologist

RNB/elm

Enclosures

cc: Karl Lytz, Latham & Watkins
Dan Greeno, Montrose Chemical Co.
Johanna Miller, EPA Region IX

fanoe.ltr

HARGIS + ASSOCIATES, INC.
2223 Avenida De La Playa, Suite 300
La Jolla, California 92037
(619) 454-0165
Telecopier (619) 454-5839

David R. Hargis, Ph.D., R.G.
Michael R. Long, R.G.
Terry M. Turner, R.G.
Roger A. Niemeyer, R.G.
Leo S. Leonhart, Ph.D., R.G.
Lanae J. Raymond
Peter T. Quinlan
Mary F. Jones, Ph.D., R.E.A.
Timothy T. Jarvis, Ph.D., R.E.A.

HAVE — Let's discuss this MATT

July 18, 1989

VIA FEDERAL EXPRESS

Mr. Matt Fanoe
COCA-COLA ENTERPRISES
One Coca-Cola Plaza, CCE-819
Atlanta, GA 30301

Re: Request for Property Access to Install a Groundwater Test Well

Dear Mr. Fanoe:

In regards to our telephone conversation of July 14, 1989, the following is the request for access which I mentioned. Please review and forward it to the necessary personnel within your company.

Pursuant to an administrative order from the United States Environmental Protection Agency (EPA) issued to Montrose Chemical Corporation of California (Montrose), this letter is a request for access to the property shown as owned by Coca-Cola Bottling Company of Los Angeles, Torrance, California. The purpose of the requested access is to install and sample, on a regular basis, one groundwater monitor well. The well is part of a groundwater investigation conducted by Montrose and overseen by the EPA that presently includes approximately 60 existing and proposed monitor wells in the immediate area (Figure 1).

The monitoring well is proposed for the northwest portion of the Coca-Cola Bottling Company property located at 19899 Pacific Gateway Drive, in Torrance, California. The field work required under the order involves access for: 1) a small truck mounted hollow stem auger drill rig, operated by sub-contractors to Hargis + Associates, Inc.; 2) Hargis + Associates, Inc. field personnel; and 3) EPA oversight personnel. The initial field work should involve no more than one week, and is planned to commence in late August or early September of 1989. The name and address of the proposed drilling contractor is: Beylik Drilling, Inc., 591 South Walnut, La Habra, California 90631.

The site will be restored to as near its original condition as possible before the field crews leave the property. An example of the proposed surface completion for the monitor wells has been provided (Figure 2).

Other Offices:
Tucson, Arizona
Phoenix, Arizona
Los Angeles, California

If you have any questions, please contact Julia Bussey or Alice Gimeno at (213) 590-4856.

Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

July 21, 1989

RECEIVED
JUL 24 1989

Mr. Michael J. Miller, P.E.
Stoney-Miller Consultants, Inc.
14 Hughes, Suite B-101
Irvine, California 92718

Attn: Gary Carlin

Dear Mr. Miller:

RECENTLY ACQUIRED PROPERTY OF COCA COLA ENTERPRISES IN THE CARSON-TORRANCE AREA OF THE CITY OF LOS ANGELES, CALIFORNIA AT 19875 PACIFIC GATEWAY DRIVE

We have completed our review of your letter report, hand delivered to this office on July 11, 1989 and have the following comments.

Your property lies about 1,300 feet north of the Del Amo Hazardous Waste Site. This site consists of waste disposal ponds and sumps that were used by a former synthetic rubber manufacturing complex. The types of wastes disposed in these ponds include volatile and semi-volatile organic compounds such as benzene, styrene and naphthalene. It is believed that [illegible] covered the entire area bordered by 190th Street to the north, Del Amo Boulevard to the south, Normandie Avenue to the west, and Vermont Avenue and Hamilton Avenue to the east. Documents in our files indicate that there were manufacturing areas, underground and above ground tanks, underground lines, and possible sumps that may be sources of soil and ground water contamination. Soils and ground water beneath the Del Amo Site are contaminated by hazardous substances believed to have originated from the disposal ponds and sumps.

Because of the contaminant problems associated with the Del Amo disposal areas, we have referred the Site to the U.S. Environmental Protection Agency (EPA) for consideration for the National Priorities List. The Department of Health Services (DHS) Toxic Substances Control Division is also evaluating the entire area of the former rubber manufacturing complex as a source of ground water contamination. The high levels of napthalene and phenanthrene that you discovered at the subject location may be associated with the synthetic rubber manufacturing operations once conducted on your property because these same chemicals were also found at the Del Amo site. We suggest that you make a thorough historical search of your property to determine the types of past operations that may be causing the contamination. Should you have any plans to remediate the contamination on this property, this office would review those plans prior to proceeding.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
REGION 4
245 WEST BROADWAY, SUITE 350
LONG BEACH, CA 90802
(213) 590-4868

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If you have any questions, please contact Julia Bussey or Alice Gimeno at (213) 590-4856.

Sincerely,

John Scandura, Chief
Site Mitigation Unit
Region 4 (Long Beach)
Toxic Substances Control Division

Enclosure

HARGIS + ASSOCIATES, INC.
2223 Avenida De La Playa, Suite 300
La Jolla, California 92037
(619) 454-0165
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David R. Hargis, Ph.D., R.G.
Michael R. Long, R.G.
Terry M. Turner, R.G.
Roger A. Niemeyer, R.G.
Lee S. Leonhart, Ph.D., R.G.
Lance J. Raymond
Peter T. Quinlan
Mary P. Jones, Ph.D., R.E.A.
Timothy T. Jervis, Ph.D., R.E.A.

HAW-
Let's discuss
this
MATT

July 18, 1989

VIA FEDERAL EXPRESS

Mr. Matt Fanoe
COCA-COLA ENTERPRISES
One Coca-Cola Plaza, CCE-819
Atlanta, GA 30301

Re: Request for Property Access to Install a Groundwater Test Well

Dear Mr. Fanoe:

In regards to our telephone conversation of July 14, 1989, the following is the request for access which I mentioned. Please review and forward it to the necessary personnel within your company.

Pursuant to an administrative order from the United States Environmental Protection Agency (EPA) issued to Montrose Chemical Corporation of California (Montrose), this letter is a request for access to the property shown as owned by Coca-Cola Bottling Company of Los Angeles, Torrance, California. The purpose of the requested access is to install and sample, on a regular basis, one groundwater monitor well. The well is part of a groundwater investigation conducted by Montrose and overseen by the EPA that presently includes approximately 60 existing and proposed monitor wells in the immediate area (Figure 1).

The monitoring well is proposed for the northwest portion of the Coca-Cola Bottling Company property located at 19899 Pacific Gateway Drive, in Torrance, California. The field work required under the order involves access for: 1) a small truck mounted hollow stem auger drill rig, operated by sub-contractors to Hargis + Associates, Inc.; 2) Hargis + Associates, Inc. field personnel; and 3) EPA oversight personnel. The initial field work should involve no more than one week, and is planned to commence in late August or early September of 1989. The name and address of the proposed drilling contractor is: Beylik Drilling, Inc., 591 South Walnut, La Habra, California 90631.

The site will be restored to as near its original condition as possible before the field crews leave the property. An example of the proposed surface completion for the monitor wells has been provided (Figure 2).

Other Offices:
Tucson, Arizona
Phoenix, Arizona
Los Angeles, California

HARGIS + ASSOCIATES, INC.

Mr. Matt Fanoe
July 18, 1989
Page 2

Routine future access to the monitor well to collect groundwater samples will also be necessary. Coca-Cola Bottling Company will be given ample notice before any sampling activities take place.

Hargis + Associates, Inc. will telephone you later this week to confirm receipt of this letter and to further discuss this matter. If you have any questions in the interim, please contact Roger Niemeyer, Matthew Wiedlin, or myself. Hargis + Associates, Inc. looks forward to cooperating with you on with matter.

Sincerely,

HARGIS + ASSOCIATES, INC.

Matthew Wiedlin for

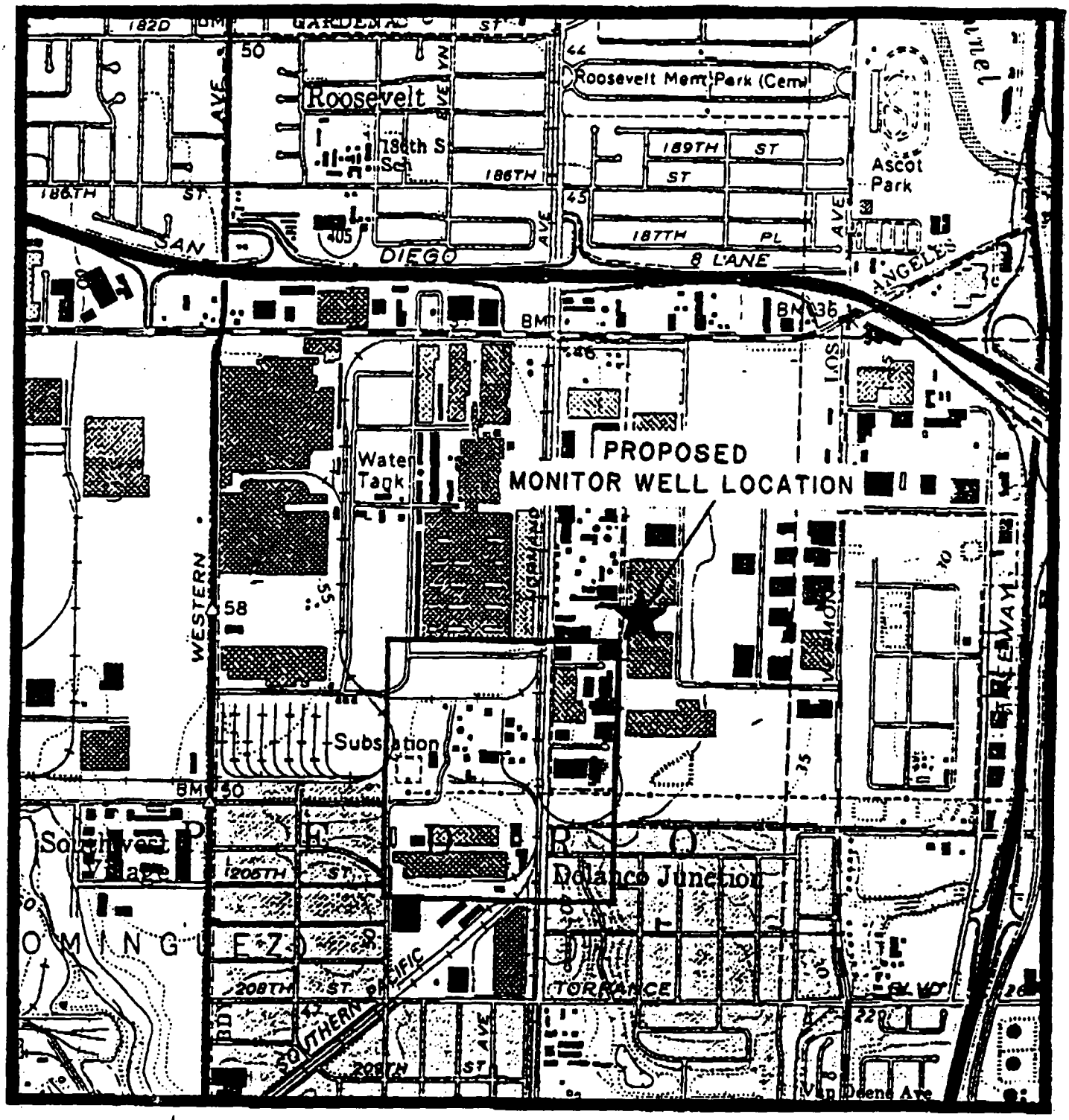
Rush N. Boynton
Hydrogeologist

RNB/elm

Enclosures

cc: Karl Lytz, Latham & Watkins
Dan Greeno, Montrose Chemical Co.
Johanna Miller, EPA Region IX

fanoe.ltr



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FEET

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MONTROSE, CALIFORNIA
TORRANCE, CALIFORNIA

APPROXIMATE LOCATION
OF STUDY AREA

HARGIS + ASSOCIATES, INC.
Consultants in Hydrogeology
San Diego, California

7/89
FIGURE 1

PREPARED BY _____ REVIEWED BY _____

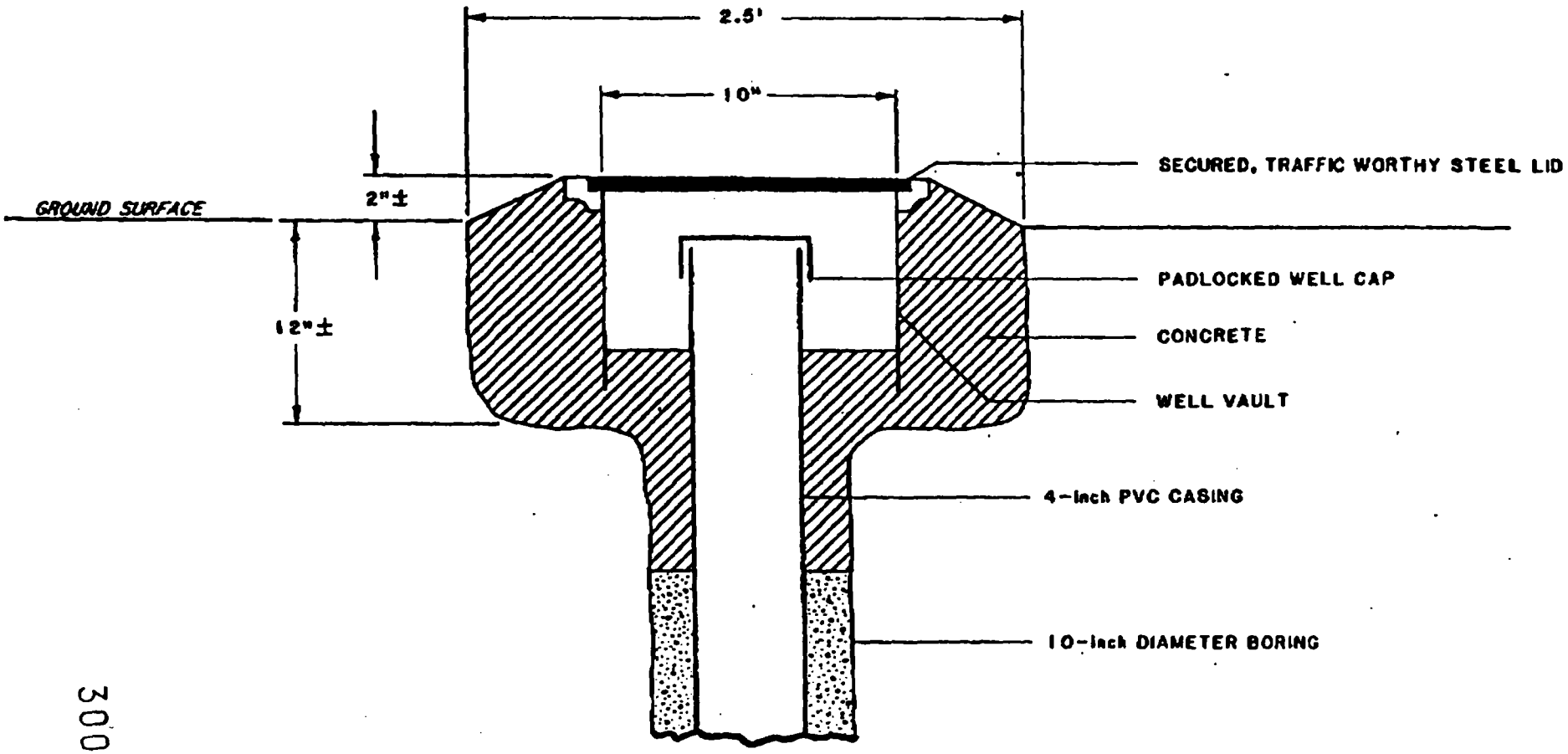

FIGURE 2. CROSS SECTIONAL VIEW OF MONITOR WELL COMPLETION

300 000656

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
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LAVL - Let's discuss this MATT

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300 000659

Other Offices:
Tucson, Arizona
Phoenix, Arizona
Los Angeles, California

HARGIS + ASSOCIATES, INC.

Mr. Matt Fanoe
July 18, 1989
Page 2

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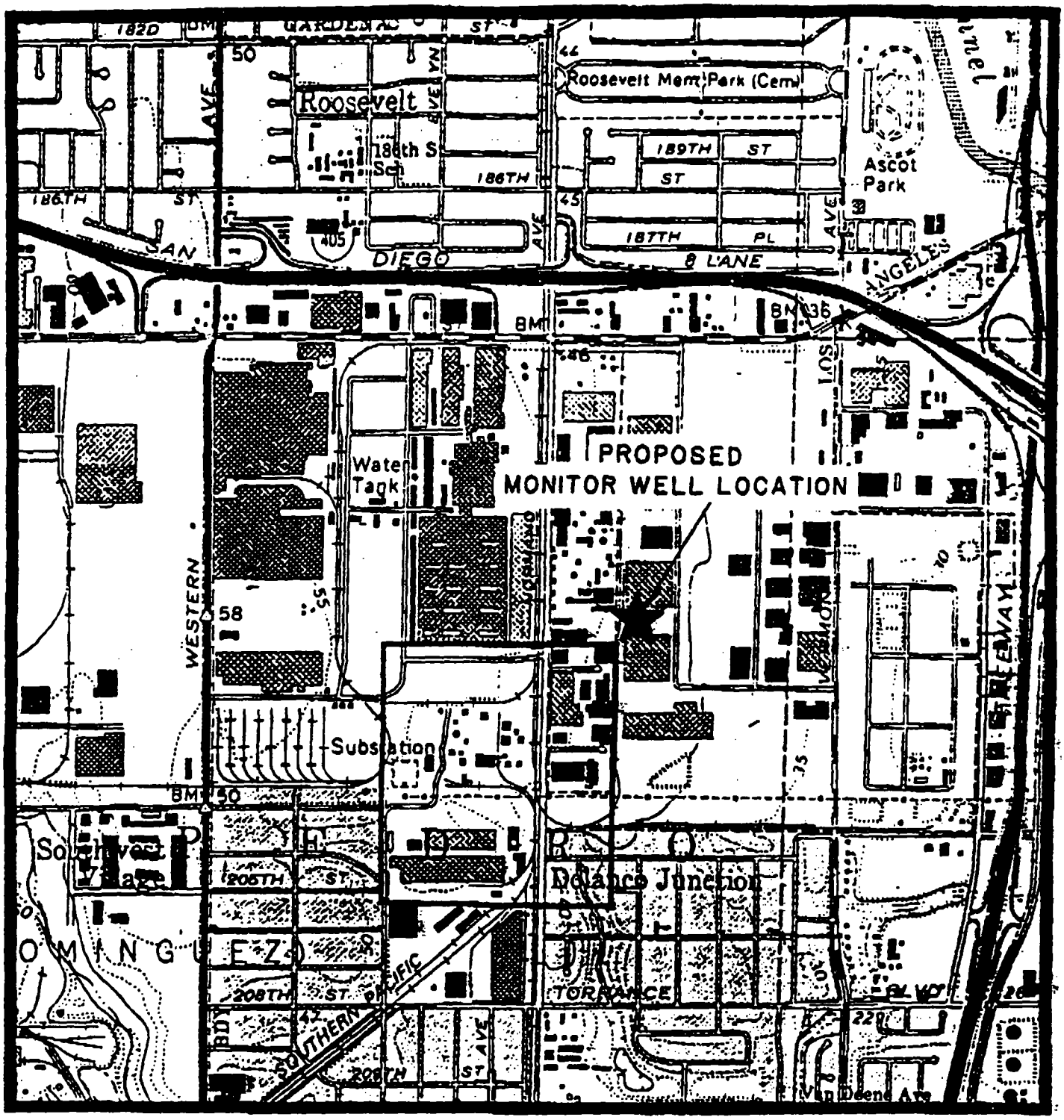

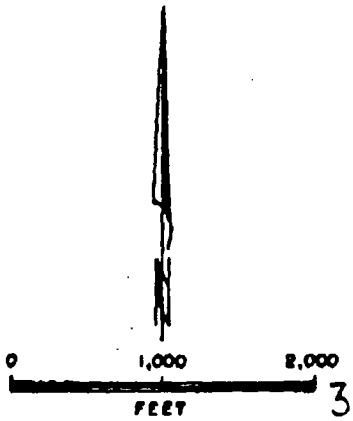

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MONTROSE, CALIFORNIA
TORRANCE, CALIFORNIA

APPROXIMATE LOCATION
OF STUDY AREA

HARGIS + ASSOCIATES, INC.
Consultants in Hydrogeology
San Diego, California

7/89
FIGURE 1

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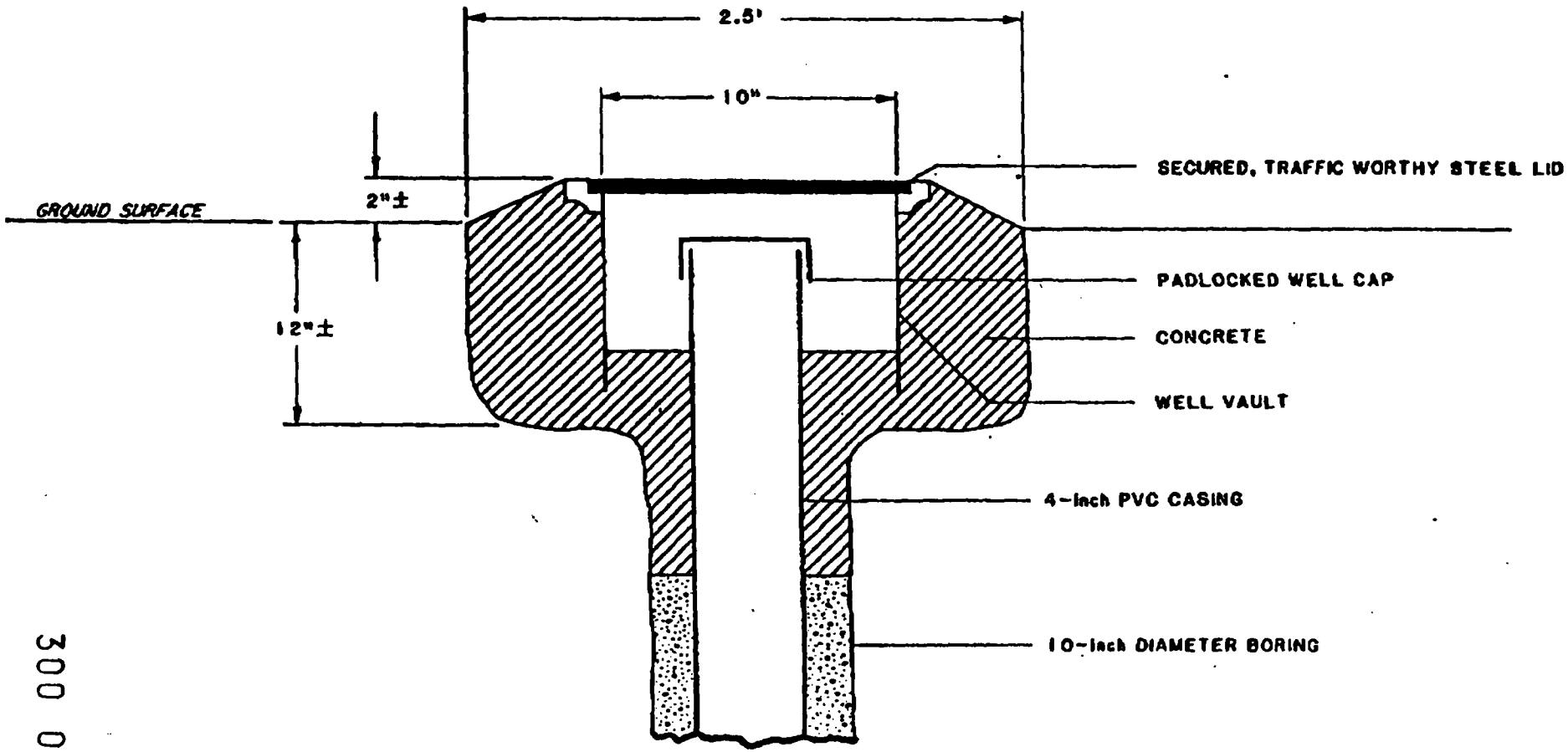

FIGURE 2. CROSS SECTIONAL VIEW OF MONITOR WELL COMPLETION

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To JOE FOLIO

Location

Telephone 313 462 . 0508

FAX ↑

From P. BEAVER

Department **Extension**

Date 8/~~16~~ 17 **Time**

If any problems occur during transmittal, please call (602) 437-3737

ENVIRONMENTAL FAX # (602) 437-3140

721 .. 0526

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leachate was extracted, and has at least the same classification under Article 3 of this subchapter as the units from which leachate was extracted; and

(2) the discharge to a different waste management unit is approved by the regional board; and

(3) the discharge of leachate to a different waste management unit shall not exceed the moisture-holding capacity of the receiving unit, and shall comply with Subsection 2520(d) of this subchapter.

2544. Interim Cover

(a) Interim cover at landfills is daily cover and intermediate cover as defined by the California Waste Management Board.

(b) Interim cover over waste discharged to a landfill shall be designed and constructed to minimize percolation of precipitation through wastes.

(c) Class I waste piles shall be covered as necessary to prevent percolation precipitation through wastes. Cover may be required by regional boards for Class II waste piles.

(d) Requirements for final cover are given in Subsection 2581(a) of this subchapter.

2545. Subsurface Barriers.

(a) Subsurface barriers are cutoff walls or grout curtains which are used in conjunction with natural geologic materials to assure that lateral permeability standards specified in Article 3 of this subchapter are satisfied. Subsections (b) and (c) specify conditions under which cutoff walls and grout curtains are used.

(b) Cutoff walls

(1) Cutoff walls are required at Class I waste management units where there is potential for lateral movement of fluid, including waste or leachate. Cutoff walls are required at Class II waste management units where there is potential for lateral movement of fluid, including waste or leachate, and the permeability of natural geologic materials is used for waste containment in lieu of a liner. Cutoff walls shall be installed at Class III landfills as required by regional boards.

(2) Cutoff walls shall be:

(A) a minimum of two feet thick for clay materials; or

(B) a minimum of 40 mils thick for synthetic materials; and

(C) keyed a minimum of five feet into natural geologic material which satisfies the applicable permeability requirements in Article 3 of this subchapter.

(3) If cutoff walls are used, excavations for waste management units shall be keyed into natural geologic materials which satisfy applicable permeability requirements in Article 3 of this subchapter.

(4) At closure of a waste pile or surface impoundment, all contaminated natural geologic materials present between the cutoff wall(s) and the waste shall be removed and disposed of at an authorized location, or the waste management unit shall be closed as a landfill.

(5) Cutoff walls shall have fluid collection systems installed upgradient of the structure. The systems shall be designed, constructed, operated, and maintained tc prevent the buildup of hydraulic head against the structure. The collection system shall be inspected regularly and accumulated fluid shall be removed.

(c) Grout Curtains

(1) Grout curtains may be used as needed to preven lateral waste movement through fractures in natura geologic materials that otherwise satisfy applicable per meability requirements in Article 3 of this subchapter Only fractures that are at or near the surface and are o limited vertical extent may be grouted.

(2) The acceptability of grout curtains for a wast management unit shall include consideration of:

(A) depth and nature of fracturing; and

(B) fracture orientation.

(3) Grout characteristics shall not be adversely affect ed by fluid, including waste and leachate, or natura conditions.

(4) Optimum grouting pressure and placement o grout holes shall be determined by test grouting.

2546. Precipitation and Drainage Controls.

(a) Waste management units and containment struc tures shall be designed and constructed to limit, to th

greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout, and overtopping under the precipitation conditions specified in Table 4.1 of this article for each class of waste management unit.

(b) Precipitation on landfills or waste piles which is not diverted by covers or drainage control systems shall be collected and managed through the leachate collection and removal system, which shall be designed and constructed to accommodate precipitation conditions specified in Table 4.1 of this article for each class of waste management unit.

(c) Diversion and drainage facilities shall be designed and constructed to accommodate the anticipated volume of precipitation and peak flows from surface runoff under the precipitation conditions specified in Table 4.1 of this article for each class of waste management unit.

(d) Collection and holding facilities associated with precipitation and drainage control systems shall be emptied immediately following each storm or otherwise managed to maintain the design capacity of the system.

(e) Surface and subsurface drainage from outside of a waste management unit shall be diverted from the waste management unit.

(f) Cover materials shall be graded to divert precipitation from the waste management unit, to prevent ponding of surface water over wastes, and to resist erosion as a result of precipitation with the return frequency specified in Table 4.1 of this article for each class of waste management unit.

2547. Seismic Design.

(a) Class I and II waste management units shall be designed to withstand the maximum credible earthquake without damage to the foundation or to the structures which control leachate, surface drainage, erosion, or gas. Class III waste management units shall be designed to withstand the maximum probable earthquake without damage to the foundation or to the structures which control leachate, surface drainage, erosion, or gas.

2548. Special Requirements for Surface Impoundments.

(a) Surface impoundments shall have sufficient freeboard to accommodate seasonal precipitation and precipitation conditions specified for each class of waste management unit in Table 4.1 of this article but in no case less than 2 feet (measured vertically), and shall be designed and constructed to prevent overtopping as a result of wind conditions likely to accompany such precipitation conditions. A freeboard of less than 2 feet may be allowed at interior surface impoundments of a waste management facility where potential overflows would be to exterior surface impoundments, the operation implements a properly developed water balance plan, and the facility is provided with a fail-safe emergency retention area solely for the purpose of containing wastes due to surface impoundment failures.

(b) An operation plan shall be submitted to the regional board which will provide operation levels and waste imput quantities permitted each month based on anticipated precipitation and on past precipitation conditions for the year.

(c) Direct pipeline discharge to surface impoundments shall be either equipped with devices or shall have fail-safe operating procedures to prevent overfilling. Discharges shall be stopped in the event of any containment system failure which causes a threat to water quality.

(d) There shall be no discharge from a surface impoundment except as authorized by waste discharge requirements.

(e) Surface impoundments shall be designed and constructed to prevent scouring of containment structures at points of discharge into the impoundments and by wave action at the waterline.

(f) All visible portions of synthetic liners shall be inspected weekly until all free liquid is removed from the surface impoundment as part of closure pursuant to Subsection 2582(a) of this subchapter. If, during the active life of the impoundment, the wastes are removed and the bottom of the impoundment cleaned down to the liner, an inspection shall be made of the bottom of the liner prior to refilling of the impoundment.

2549. Special Requirements for Land Treatment Facilities.

(a) Dischargers operating land treatment facilities shall comply with the general criteria specified in Subsections 2541(a) and (d) of this article, with the precipi-

tation and drainage controls specified in Section 2546 of this article, and with the seismic design criteria in Section 2547 of this article.

(b) Dischargers shall design, construct, operate, and maintain land treatment units to maximize the degradation, transformation, and immobilization of waste constituents in the treatment zone. Dischargers shall design, construct, operate, and maintain units in accord with all design and operating conditions that were used in treatment demonstrations under Section 2532 of this subchapter.

Article 5. Water Quality Monitoring for Classified Waste Management Units

2550. Applicability.

(a) The siting, design, construction, and operation standards contained elsewhere in this subchapter and in Title 22 of this code are intended to prevent adverse impacts on water quality. The water quality protection provisions of this article are intended to detect leaks at waste management units and to provide a corrective action program should containment features fail to prevent leakage of wastes from waste management units. Owners and operators of new and existing landfills, waste piles, and surface impoundments shall monitor ground and surface water according to the provisions of the article, and shall perform unsaturated zone monitoring according to the provisions of this article as feasible. In determining whether unsaturated zone monitoring is feasible, the distance to ground water, the permeability of natural geologic materials, and the ease of installation of unsaturated zone monitoring devices shall be considered. Owners and operators of new and existing land treatment facilities shall monitor ground water, surface water, and the unsaturated zone according to the provisions of this article. The unsaturated zone requirements of this article are not applicable to Class I land treatment units.

(b) Owners and operators of Class I waste management units shall comply with the provisions of this article. Owners and operators of Class II and Class III units may be allowed to conduct the analytical and statistical portions of their monitoring program according to alternative procedures, provided that the alternative procedures accurately represent background water quality and water quality downgradient of waste management units. Alternative analytical and statistical procedures shall provide leak detection consistent with the prescribed procedures.

(c) A land treatment waste management unit is not required to comply with the post-closure monitoring provisions of this article if the regional board fins that the treatment zone soil does not contain concentration of waste constituents at closure that are above background levels of those constituents by an amount that is statistically significant, and if the unsaturated zone monitoring program has not shown a statistically significant increase in waste constituents below the treatment zone during the operating life of the unit.

(d) The regulations under this article apply during the active life of the waste management unit (including the closure period). After closure of the waste management unit, the regulations in this article apply during the postclosure maintenance period unless all waste, waste residues, contaminated containment system components, and contaminated geologic materials have been removed or decontaminated at closure.

2551. Required Programs.

(a) Dischargers subject to this subchapter shall conduct the following programs in accordance with the provisions of Section 2555 and other applicable provisions of this article:

(1) The discharger shall institute a detection monitoring program. Details of the program shall be approved by the regional board.

(2) If indicator parameters or waste constituents are detected at the compliance points in excess of the water quality protection standards, the discharger shall institute a verification monitoring program.

(3) If verification monitoring establishes that any water quality protection standard has been exceeded at or downgradient of the points of compliance, the discharger shall institute a corrective action program.

(b) Waste discharge requirements shall include one or more of the programs identified in subsection (a) of this section and shall specify the circumstances under which each of the programs shall be required. In deciding

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Article 4. Construction Standards

2540. General Construction Criteria

(a) Class I and Class II waste management units shall be designed and constructed to prevent migration of wastes from the waste management units to adjacent geologic materials, ground water, or surface water, during disposal operations, closure, and the post-closure maintenance period.

(b) Each Class II waste management unit shall be designed and constructed for the containment of the specific wastes which will be discharged.

(c) Class III landfills shall have containment structures which are capable of preventing degradation of waters of the state as a result of waste discharges to the landfills if site characteristics are inadequate.

(d) New landfills, waste piles, and surface impoundments shall comply with the requirements of this article. Existing waste piles and surface impoundments shall be fitted with liners and leachate collection and removal systems as described in Section 2542 and 2543 of this article as feasible. Existing landfills and waste piles shall have interim cover as described in Section 2544 of this article. Existing landfills, waste piles, and surface impoundments shall be fitted with subsurface barriers as described in Section 2545 of this article as needed and feasible, and shall have precipitation and drainage control facilities as described in Section 2546 of this article. Existing surface impoundments shall comply with Section 2548 of this article. New and existing land treatment units shall comply with Section 2549 of this article. All existing waste management units shall comply with the seismic design criteria in Section 2547 of this article.

(e) Containment structures shall be designed by and construction shall be supervised and certified by a registered civil engineer or a certified engineering geologist. Facilities shall receive a final inspection and approval of the construction by regional board or State Board staff before use of the facility commences.

(f) The integrity of containment structures shall be maintained. Excavations made as part of discharge operations shall not result in removal of any portion of a containment structure.

2541. General Criteria for Containment Structures.

(a) Materials used in containment structures sha have appropriate chemical and physical properties t ensure that such structures do not fail to contain wast because of pressure gradients (including hydraulic hea and external hydrogeologic forces), physical contact wit the waste or leachate, chemical reactions with soil an rock, climatic conditions, the stress of installation, an the stress of daily operation.

(b) Permeabilities specified for containment struc tures other than cover shall be relative to the fluid including waste and leachate, to be contained. Permeab lities specified for final cover shall be relative to water.

(c) Permeabilities shall be determined primarily b appropriate field test methods in accordance with ac cepted civil engineering practice. The results of laborat ry tests with both water and leachate, and field test with water, shall be compared to evaluate how the fiel permeabilities will be affected by leachate. Appropriat compaction tests may be used in conjunction with labo ratory permeability tests to determine field permeabil ties as long as a reasonable number of field permeabilit tests are also conducted. One acceptable method fo testing the compatability of leachate and clay liner (including the permeability of the liner to leachate) i given in Appendix I.

(d) Earthen materials used in containment structure other than cutoff walls and grout curtains shall consist o a mixture of clay and other suitable fine-grained soil which have the following characteristics, and which, i combination, can be compacted to attain the require permeability when installed. Liners made of such mate rials are referred to as "clay liners" in this subchapter.

(1) At least 30 percent of the material, by weigh shall pass a No. 200 U.S. Standard sieve.

(2) The materials shall be fine-grained soils with significant clay content and without organic matter, ir the "SC" (clayey sand), "CL" (clay, sandy or silt clay), or "CH" (clay, sandy clay) classes of the Unitec Soil Classification system.

(e) Construction standards for waste managemen units other than land treatment are given on Table 4 and in Figures 4.1 and 4.2.

Waste Mgmt Unit Classification	Type of Waste Management Unit	Clay Liner (2)	Synthetic Liner	Leachate Collection and Removal System	Interim Cover	Subsurf Barriers: Cutoff Walls	Subsurf Barriers: Grout Curtains	Capacity of Precipitation and Drainage Control Facilities	Seismic Design
Class I	Landfill	required, $\leq 1 \times 10^{-7}$ cm/sec	required [7]	required, blanket type	required	$\leq 1 \times 10^{-7}$ cm/sec (10)	$\leq 1 \times 10^{-7}$ cm/sec	probable maximum precipitation	withstand maximum credible earthquake
	Surface Impoundment	double liner (3) $\leq 1 \times 10^{-7}$ cm/sec	required [8]	required, blanket type		$\leq 1 \times 10^{-7}$ cm/sec (10)	$\leq 1 \times 10^{-7}$ cm/sec		
	Waste Pile	optional (4), $\leq 1 \times 10^{-7}$ cm/sec	may be required [9]	required, blanket type	required	$\leq 1 \times 10^{-7}$ cm/sec (10)	$\leq 1 \times 10^{-7}$ cm/sec		
Class II	Landfill	required (5), $\leq 1 \times 10^{-6}$ cm/sec	not required	required, blanket type	required	$\leq 1 \times 10^{-6}$ cm/sec (11)	$\leq 1 \times 10^{-6}$ cm/sec	1000-year, 24-hour precipitation	
	Surface Impoundment	~~double or~~ single required (6), $\leq 1 \times 10^{-6}$ cm/sec	not required	required with double liner, blanket type		$\leq 1 \times 10^{-6}$ cm/sec (11)	$\leq 1 \times 10^{-6}$ cm/sec		
	Waste Pile	optional (4) (5), $\leq 1 \times 10^{-6}$ cm/sec	not required	may be required, blanket type	may be required	$\leq 1 \times 10^{-6}$ cm/sec (11)	$\leq 1 \times 10^{-6}$ cm/sec		
Class III	Landfill	optional, $\leq 1 \times 10^{-6}$ cm/sec (see Section 2533)	not required	required if liner is required, blanket, or dendritic	required	$\leq 1 \times 10^{-6}$ cm/sec if required	$\leq 1 \times 10^{-6}$ cm/sec if required	100-year, 24-hour precipitation (12)	withstand maximum probable earthquake

[1] Applicable regulations in this article may provide for exemptions to certain requirements. Subsection 2540(d) of this article describes applicability to existing facilities.

[2] All permeabilities specified in this table are maximum allowable permeabilities.

[3] Outer liner shall be a clay liner; inner liner may be a synthetic liner instead of a clay liner if inspected according to Subsection 2548(f) of this article.

[4] A synthetic liner alone may be allowed based on nature of waste to be contained and duration of the operation. A waste pile with a synthetic liner alone may not be closed as a landfill pursuant to Section 2583 of this subchapter. The synthetic liner permeability shall be the same or less than that which would be required for a clay liner.

[5] Clay liner required unless waste management units are underlain by a substantial thickness of natural geologic materials with permeability of 1×10^{-6} cm/sec or less.

[6] Single liner shall be a clay liner and removed or replaced as described in Section 2542 of this article. Double liner systems shall have either an outer clay liner or shall be underlain by a substantial thickness of natural geologic materials with a permeability of 1×10^{-6} cm/sec or less to act as an outer liner.

[7] Synthetic inner liner required in addition to a clay outer liner unless exempted pursuant to Subsection 2510(b) of this subchapter.

[8] Synthetic inner liner required in addition to a clay liner unless the surface impoundment is closed according to Subsection 2582(b)(1) of this subchapter, or unless exempted pursuant to Subsection 2510(b) of this subchapter.

[9] Synthetic inner liner required unless the pile is closed according to Subsection 2583(a)(1), or unless exempted pursuant to Subsection 2510(b) of this subchapter.

300 000668

2542. Liners.

(a) Liners shall be designed and constructed to contain the fluid, including waste and leachate, as required by Article 3 of this subchapter.

(b) Clay liners for a Class I or Class II waste management unit shall be a minimum of 2 feet thick and shall be installed at relative compaction of at least 90 percent. For a Class III landfill, a clay liner, if required, shall be a minimum of 1-foot thick and shall be installed at a relative compaction of at least 90 percent.

(c) Synthetic liners shall have a minimum thickness of 40 mils.

(d) Liners shall be installed to cover all natural geologic materials at a waste management unit likely to be in contact with waste or leachate.

(e) A Class II surface impoundment may have a single clay liner with a permeability of 1×10^{-6} cm/sec or less if the liner is removed or replaced before the last 25 percent (minimum 1 foot thickness) of the liner is penetrated by fluid, including waste or leachate. The method used to determine seepage velocity shall be included with the calculations of liner penetration.

2543. Leachate Collection and Removal Systems.

(a) Leachate collection and removal systems are required for Class I landfills, surface impoundments, and waste piles; for Class II landfills and surface impoundments; and for Class III landfills which have a liner or accept sewage or water treatment sludge. The systems shall be installed directly above underlying containment features for landfills and waste piles, and installed between the liners for surface impoundments. Leachate collection and removal systems requirements are summarized on Table 4.1 Class II landfills and waste piles which contain only dry wastes (not including nonhazardous solid waste and decomposable waste) may be allowed to operate without leachate collection and removal systems if the discharger demonstrates, based on climatic and hydrogeologic conditions, that leachate will not be formed in, or migrate from, the unit.

(b) Where leachate collection and removal systems are used, they shall be installed immediately above the liner, or between the inner and outer liner of a double-liner system, and shall be designed, constructed, maintained, and operated to collect and remove twice th maximum anticipated daily volume of leachate from th waste management unit.

(c) Regional boards shall specify design and operatin conditions in waste discharge requirements to ensur that there is no buildup of hydraulic head on the liner The depth of fluid in the collection sump shall be kept a the minimum needed to ensure efficient pump operation

(d) Leachate collection and removal systems shall be designed and operated to function without clogging through the scheduled closure of the waste management unit and during the post-closure maintenance period. The systems shall be tested at least annually to demonstrate proper operation. The results of the test shall be compared with earlier tests made under comparable conditions.

(e) Leachate collection and removal system shall consist of a permeable subdrain layer which covers the bottom of the waste management unit and extends as far up the sides as possible, (i.e., blanket-type) except as provided in subsection (f) of this section. The collection and removal system shall be of sufficient strength and thickness to prevent collapse under the pressures exerted by overlying wastes, waste cover materials, and by any equipment used at the waste management units.

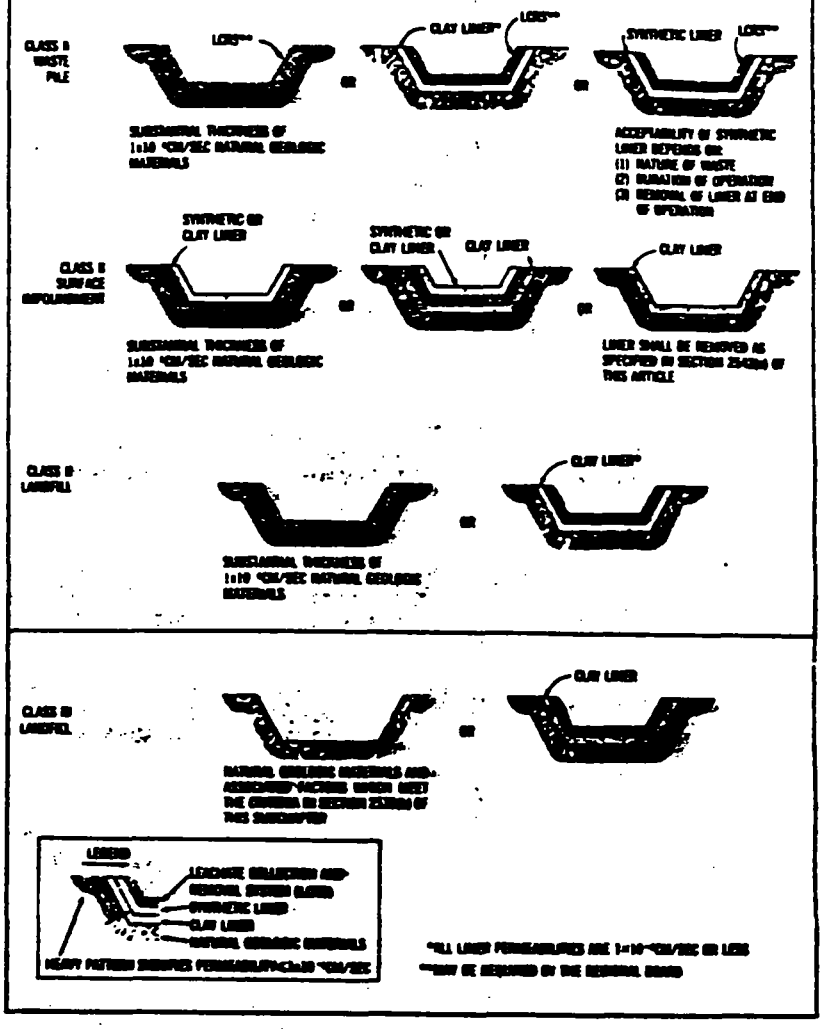
(f) If a Class III landfill is required to have an artificial liner and receives only permeable waste that allows free drainage of percolating fluid, a dendritic leachate collection and removal system which underlies less than 100 percent of the waste may be allowed. Only wastes which have a permeability which approximates that of subdrain material and will remain permeable throughout the active life and post-closure maintenance period of the landfill may be placed adjacent to the liner in this type of system. The liner shall be sloped towards the subdrain(s) to prevent ponding.

(g) Collected leachate shall be system returned to the waste management unit(s) from which it came or discharged in another manner approved by the regional board. Collected leachate may be discharged to a different waste management unit if:

(1) the receiving waste management unit has a leachate collection and removal system, contains wastes which are similar in classification and characteristics to those in the waste management unit(s) from which

FIGURE 4.2

LINER REQUIREMENTS FOR CLASS II WASTE PILES & SURFACE IMPOUNDMENTS AND CLASS II & III LANDFILLS



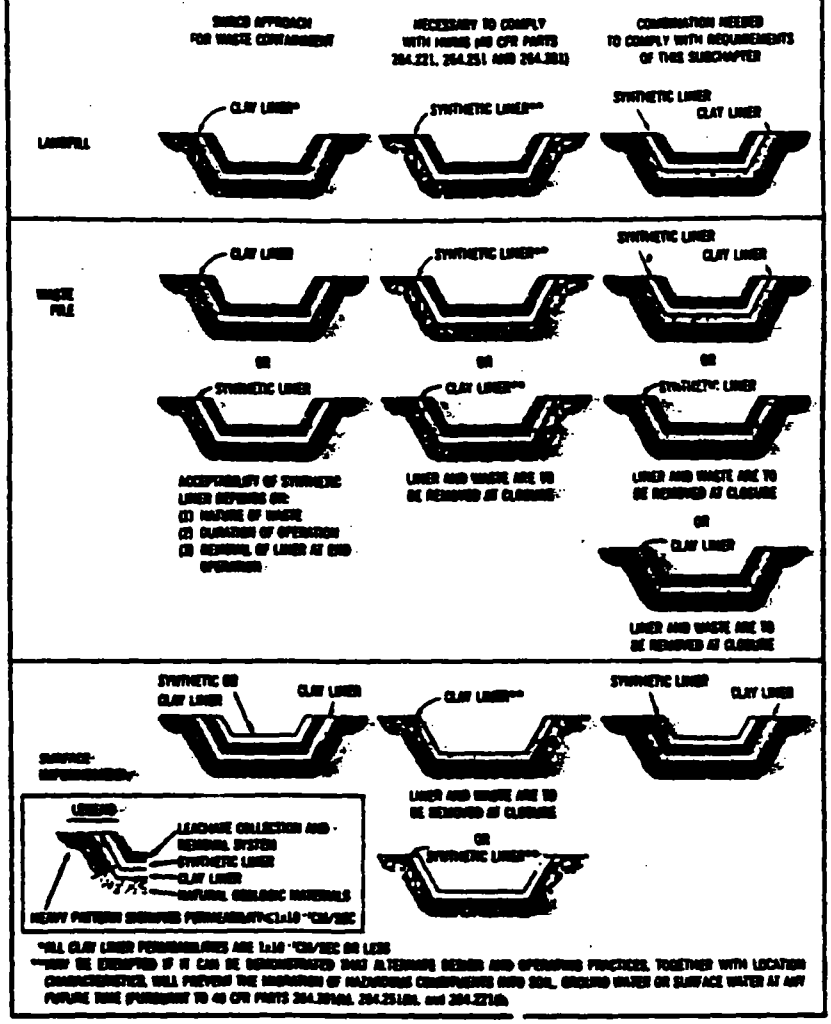
[10] Cutoff walls required where there is potential for lateral movement of fluid, including waste or leachate.

[11] Cutoff walls required where there is potential for lateral movement of fluid, including waste or leachate, and the permeability of natural geologic materials is used for waste containment.

[12] Exemptions may be granted if the discharger can demonstrate that the integrity of containment features, precipitation and drainage control structures, and monitoring facilities will not be jeopardized if this criterion is not met.

FIGURE 4.1

CLAY & SYNTHETIC LINER REQUIREMENTS FOR CLASS I LANDFILLS, WASTE PILES, & SURFACE IMPOUNDMENTS



*ALL CLAY LINER PERMEABILITIES ARE 1x10 -7CM/SEC OR LESS

**MAY BE EXEMPTED IF IT CAN BE DEMONSTRATED THAT ALTERNATE DESIGN AND OPERATING PRACTICES, TOGETHER WITH LOCATION CHARACTERISTICS, WILL PREVENT THE MIGRATION OF HAZARDOUS CONSTITUENTS INTO SOIL, GROUND WATER OR SURFACE WATER AT ANY FUTURE TIME (PURSUANT TO 40 CFR PARTS 264.301(d), 264.251(b), and 264.271(b).

former Vlg. set back @ 40' on Pacific Coast
" " " @ 125' on east - [illegible]
" 400' x 400'

Treatment cell

Backhoe
- need soil samples for permeability - schedule 8/25 (?)
- grading permits obtained on 9/5/89
- grade north portion of site first (5 days)
- excavate contaminated soil and stockpile to start September 11, 1989
- 400K spent to date on E+R
- firm dollars will be 3 to 4 weeks

- compare contaminants to area already excavated @ NEC of site

forms

* Soil test [illegible] done on 8/25
* Work plan by Sept 1st
* Begin [illegible] on Sept [illegible]
* [illegible]
* Conceptual on Sept 8 [illegible]
* Final design Sept 22
* Final cost Sept 29 (Cost ± 10%)

native project caught in 5-6 months

Key opens North Gate

300 000672

Pete Beaver,

As per the telephone conversation with Paul Bouchard at Brent Petro. (213 432-5991) a price quote was given of $52.50 a ton For the contaminated soils Petroleum hydro. are accepted up to 100% oils. There are no problems with different types of soil (clay, silt, gravel) etc. being accepted at this facility located in Wilmington CA. However, no heavy metals or PCB contaminated soils will be accepted. We are scheduled for a site facility tour at our earliest convenience. A letter of acceptance and a GC+A* will be provided on 9-12-89. A copy of our analytical was submitted to Brent Petro.

A sample of the soil will be given to Brent Petro so that they can run their own analysis. Receiving of the material can begin at the time we begin excavating.

Thanks,

Virgil T.

Brent Petro.
401 Canal St.
Wilmington CA

52.50/ton
~ .75/cu.yd.

REVIEWED	WESTERN TECHNOLOGIES INC.
PREPARED	The Quality People

TO: P. Beaver

9/4/89
W. Shonard

Re: → Coca Cola – Torrence
5000 yds^3 – 3000 ppm
1 shot –

I 1.5 # / 1000

3 $5000\ \cancel{yd^3} \cdot \frac{2700\ \#}{\cancel{yd^3}} \cdot \frac{3000\ \cancel{ppm}\ \#}{10^6\ \#} = 40{,}500\ \#$ of TPHC.

For 1 innoculation = $\frac{1.5(5000)}{4} = 1875 = 2000\#$
arbitrarily chosen →

at \$5.00/lb → \$10,000 / Bacteria

II Fertilizer – Ammonium Phosphate
40,500 # TPHC x 0.18 = 7300 # of Ammonium Phosphate
\$25/100 # = \$1825

So Est Cost – Bacteria – 10K
Fertilizer 2K
\$12K ← Total Est Cost

300 000678

-1/7/89

Raul's Comments

Page 2 of 2
would just like us to say that an agreement was made

- Is there enough emphasis on the degree of the hazard?

- What can be done prior to word from Agency (already told him not much)

If you need to call
Sat or Sun
714 535 5483

- Does Tone give image that Coca Cola wants to do white right?

301 000058

FAX TO

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

October 26, 1988

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California

Project No: 10221-00
Report No: 8-0390

Attn: Mr. Raul Ramirez

Subject: Update of findings regarding an ongoing Environmental Assessment of the South Bay Warehouse Facility, Pacific Gateway Drive, Torrance, California.

Gentlemen:

The purpose of this letter is to update Coca-Cola Enterprises regarding the ongoing environmental assessment on the subject site. As referenced in our letter of October 7, 1988, subsurface contamination has been found at the site. Stoney-Miller Consultants Inc. (SMC) has recently conducted additional limited subsurface investigation in this area of the site to determine if the contamination is a localized problem or more general. Two general conclusions that we can make at this time regarding the contamination issue are as follows:

- o A portion of the subsurface contamination extends to the eastern property line adjacent to the rail road tracks; and
- o Based on results of laboratory analyses, the depth of contamination appears to be shallow, (i.e zero to 8 feet deep). Clean samples have been collected below these depths.

SMC does not know the horizontal extent of this contamination at this time. An understanding of the extent of contamination will require additional drilling and sampling. Due to the relatively shallow nature of the contamination, extensive deep drilling is not anticipated.

Another area of concern regarding this matter, involves the close proximity of a number of Environmental Protection Agency superfund sites. Our records indicate five EPA syuperfund sites within a few blocks of the subject project. SMC is currently attempting to obtain more specific data regarding the nature of any contamination that might be associated with these superfund sites. However, we are experiencing difficulty obtaining the information in a timely manner, due to government regulatory protocol regarding issues of this matter. At this point we have discovered that the State Of California Department Of Health Services has a file on four of the five sites in question and has conceded us an appointment to review these files on Monday, October 31. It is SMC's position that we can not properly advise you of the types of risks Coca Cola might be accepting

, including without limitation the adjacent property to the [illegible] of etc.

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

FAX # (213)-5 4-8668

Letter Miles P. Fischer

FAX 212-279-2696

AT REQUEST OF Paul Ramirez

PAUL SCHLAUMAN

FAX (218)-720-2102

cc:

DANIEL HERSCHER

(213) 553-4647

JOY CROSE

FAX (213) ~~620-1280~~ 620-1398

301 00006

October 26, 1988

Coca-Cola Enterprises
1334 South Central Avenue
Los Angeles, California

Project No: 10221-00
Report No: 8-0390

Attn: Mr. Raul Ramirez

Subject: Update of findings regarding an ongoing Environmental Assessment of the South Bay Warehouse Facility, Pacific Gateway Drive, Torrance, California.

Gentlemen:

The purpose of this letter is to update Coca-Cola Enterprises regarding the ongoing environmental assessment on the subject site. As referenced in our letter of October 7, 1988, subsurface contamination has been found at the site. Stoney-Miller Consultants Inc. (SMC) has recently conducted additional limited subsurface investigation in this area of the site to determine if the contamination is a localized problem or more general. Two general conclusions that we can make at this time regarding the contamination issue are as follows:

- o A portion of the subsurface contamination extends to the eastern property line adjacent to the rail road tracks; and

- o Based on results of laboratory analyses, the depth of contamination appears to be shallow, (i.e zero to 8 feet deep). Clean samples have been collected below these depths.

SMC does not know the horizontal extent of this contamination at this time. An understanding of the extent of contamination will require additional drilling and sampling. Due to the relatively shallow nature of the contamination, extensive deep drilling is not anticipated.

Another area of concern regarding this matter, involves the close proximity of a number of Environmental Protection Agency superfund sites. Our records indicate five EPA syuperfund sites within a few blocks of the subject project, including without limitation the adjacent property to the north owner by RR Donnelly. SMC is currently attempting to obtain more specific data regarding the nature of any contamination that might be associated with these superfund sites. However, we are experiencing difficulty obtaining the information in a timely manner, due to government regulatory protocol regarding issues of this matter. At this point we have discovered that the State Of

October 27, 1988

Mr. Miles P. Fischer

Subject: Letter of transmittal for a letter to Coca Cola regarding the status of an ongoing Environmental Assessment of the South Bay Warehouse Facility, Pacific Gateway Drive, Torrance, California.

Dear Mr. Fischer:

At the direction of Mr. Raul Ramirez of Coka Cola Enterprises, Stoney-Miller Consultants, Inc. is transmitting the attached letter. If you have any questions, please call.

Very Truly Yours,

Stoney-Miller Consultants, Inc.

Gary T. Carlin
Consulting Environmental Geologist

cc: Mr. Raul Ramirez
Mr. Paul Schlarman
Mr. Daniel Herscher
Ms. Joy Crose

October 26, 1988

Project No: 10221-00
Report No: 8-0390
Page No: 2

California Department Of Health Services has a file on four of the five sites in question and has conceded us an appointment to review these files on Monday, October 31. It is SMC's position that we can not properly advise you of the types of risks Coca Cola might be accepting regarding the purchase of the subject site until we have had an opportunity to review these files.

If you have any questions regarding this matter, please call.

Very Truly Yours,

Stoney-Miller Consultants, Inc.

Gary T. Carlin
Consulting Environmental Geologist

GTC:jz

DATE OBSERVED: 10/11/88 METHOD OF DRILLING: Hand Auger

LOCATION: Near Clarifier (?) - Tank South of

LOGGED BY: CTC GROUND ELEVATION: _____

SMC

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. B-6 DESCRIPTION	LABORATORY TEST Gasture 14	DEPTH (FEET)
0								Asphalt - ≈ 2½" - & 6" Base		0
								Clayey Silt, Black, Moist, Firm,	0	
								Strong Petroliferous Odor		
								Possibly Creosote		
								To ≈ 2½ Deep		
5								@ 2½ - Clayey Silt, Dark Brown	0	5
								Continued Odor		
								@ 5' - Tank on Piping -		
								Refusal		
10										10
15										15
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000064

DATE OBSERVED: 10/11/88 METHOD OF DRILLING: Hand Auger

LOCATION: near clarifier - Tank? West of

LOGGED BY: GTC GROUND ELEVATION: _____

SMC

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. B-7 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Asphalt - 2" + 6" Base		0
								Clayey Silt, Black, moist, Firm		
								Stained + Strong Petro odor		
								Staining to 3'		
								@ ≈ 3' Chang to light Brown		
5				X				Slight Pet. odor		5
								Silty Sand at 3'		
10				X				- Continued Silty Sand		10
								+ Slight Pet odor		
15				X						15
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000065

DATE OBSERVED: 10/11/88 METHOD OF DRILLING: HAND AUGER

LOCATION: NEAR CLARIFIER - TANK?

LOGGED BY: GTC GROUND ELEVATION:

SMC

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. B-8 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								ASPHALT ≈ 2" + 6" BASE		0
								CLAYEY SILT, BLACK, MOIST, TO WET,		
					X			FIRM, STRONG PET. ODOR		
								POSSIBLE CREOSOTE AS IN		
								B-6, 7 + 8		
5								@ 5' - SILTY SAND, LIGHT BROWN		5
								MOIST, DENSE, SLIGHT PET		
								ODOR		
					X			- CONTINUED SILTY SAND W/		
10								POSSIBLE SLIGHT ODOR		10
15					X			- CONTINUED SILTY SAND		15
								W/ POSSIBLE SLIGHT ODOR		
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000066

DATE OBSERVED: 10/11/88 METHOD OF DRILLING: HA-O AUGER

LOCATION: NEAR TANK - CLARIFIER

LOGGED BY: CTC GROUND ELEVATION:

SMC

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. B-9 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								ASPHALT ± 2" – 6" BASE		0
								CLAYEY SILT, BLACK, MOIST,		
				X				FIRM, STRONG PET ODOR.		
								TO 5'		
5				X				@ 5' SILTY SAND, LITE BROWN, MOIST		5
								DENSE, SLIGHT ODOR (PETR)		
10				X				– CONTINUED SILTY SAND & SLIGHT		10
								ODOR POSSIBLE		
15				X				– CONTINUED SILTY SAND &		15
								SLIGHT ODOR POSSIBLE		
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000067

DATE OBSERVED: 10/11/88 METHOD OF DRILLING: HAND AUGER

LOCATION: COCA COLA

LOGGED BY: CTC GROUND ELEVATION: _____ NEAR CLARIFIER — TANK ?

SMC

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. B-10 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								- GRAVEL ≈ 1' THICK		0
								- CLAYEY SILT, BLACK, MOIST		
								FIRM, STRONG PET ODOR		
					X			POSSIBLY CONTAMINATED TO ≈ 5'		
5										5
								SILTY SAND, LITE BROWN, MOIST		
								DENSE, SLIGHT PET ODOR		
								TO NOD.		
10										10
					X			- CONTINUED - SILTY SAND + PET		
								ODOR MODERATE		
15										15
								B-11		
								SAME AS B-10 BUT		
								NO PET. ODOR		
								SAMPLES COLLECTED AT 8'		
20										20
								B-12 - INSIDE BUILDING		
								- FILL - SANDY CLAY TO		
								3'		
25								THERE AFTER 3 TO 5' TO		25
								NO ODOR		
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000068

DATE OBSERVED: 11/2/85 METHOD OF DRILLING: HAND AUGER

LOCATION: Cola - Cola Terrace

LOGGED BY: GPE GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~[illegible]~~ B-13 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Gravel - 3"		0
								Clay, Dark Brown, moist stiff some small gravel		
								Light brown		
5								[illegible] Sample 5.5 feet		5
								tan silty [illegible]		
10								9' end of [illegible]		10
								Sample		
15										15
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000069

DATE OBSERVED: 7 88 METHOD OF DRILLING: Hand Auger

LOCATION: Coca-Torrance

LOGGED BY: GPF GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. 12 B-14 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Gravel + Packed fill, dry		0
								brown silty clay 1"		
								Silty Clay, light Brown, dry, hard.		
								[illegible]		
								Dark Brown, slightly moist 3"		
5								5 feet tan, dry sample		5
10								9' EDB sample		10
15										15
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000070

DATE OBSERVED: 11/2/85 METHOD OF DRILLING: Hand

LOCATION: Coca Cola Torrance

LOGGED BY: [illegible] GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. B-15 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Gravel + Packed fill		0
								Dark brown clay, stiff		
								Slightly moist cohesive		
5								3' tan silty clay, dry		5
								loose, non cohesive		
10								10' [illegible]		10
15										15
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 11/2/83 METHOD OF DRILLING: Hand

LOCATION: Coca-Cola- Torrance

LOGGED BY: GPE GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~111~~ B-16 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Gravel fill		0
								Dark Brown Clay, moist, dense, cohesive		
5								3' Tan silty clay, dry loose		5
10										10
								9' EOB		
15										15
20										20
25										25
30										30
35										35
40										40

JOB NO.: LOG OF BORING FIGURE:

301 000072

DATE OBSERVED: 11/2/88 METHOD OF DRILLING: HAND

LOCATION: TORRANCE Com[illegible]

LOGGED BY: [illegible] GPF GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. B-17 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Asphalt cover 8 Clay, [illegible]		0
5								THN [illegible] dry [illegible] 5' sample 7' gravel occasionally 5%		5
10								9' EOB		10
15										15
20										20
25										25
30										30
35										35
40										40

301 000073

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 11/2/88 METHOD OF DRILLING: [illegible]

LOCATION: [illegible]

LOGGED BY: G.P.F GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~16~~ B-18 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Asphalt		0
								[illegible]		
								[illegible]		
5								5' sample		5
								[illegible]		
10								9' T. OB		10
15										15
20										20
25										25
30										30
35										35
40								301	000074	40

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 11/2/88 METHOD OF DRILLING: Hand Auger

LOCATION: [illegible]

LOGGED BY: GPE GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~17~~ B-19 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Asphalt		0
								Grey, wet Clay, soft, loose		
								Black, clay dense, Med Moist strong odor, - Red stripes		
5								Sample 1.5		5
								3' ~~[illegible]~~ [illegible] sample mottled Brown & Black		
								5' tan, silty Clay, dry, loose		
10										10
								7'		
15								9' EOB		15
20										20
25										25
30										30
35										35
40										40

301 000075

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 11/2/88 METHOD OF DRILLING: [illegible]

LOCATION: [illegible] Torrance

LOGGED BY: GPE GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~118~~ B-20 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Asphalt		0
								Clay, moist dense, dark Brown		
5										5
								6' tan loose		
								7' sample		
10								[illegible] EOB		10
15										15
20										20
25										25
30										30
35										35
40										40

301 000076

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 11/2/84 METHOD OF DRILLING: Hand Auger

LOCATION: Good Eyes - Torrance

LOGGED BY: GPE GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~19~~ B-21 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Asphalt - [illegible]		0
5								- Physically clean at 5 feet [illegible]		5
10								[illegible] 9'		10
15								11/9/88 continued boring ~ 12 feet grey green silty clay, slightly moist, odd odor. 15' rock forces EOB		15
20										20
25										25
30										30
35										35
40										40

301 000077

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 11/2/68 METHOD OF DRILLING: Hand Auger

LOCATION: Coca-Cola Torrance

LOGGED BY: GRE GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~20~~ B-22 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Asphalt Black, clay moist, [illegible]		0
5								[illegible] physically clean [illegible]		5
10								[illegible]		10
15										15
20										20
25										25
30										30
35										35
40										40

301 000078

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 1/7/90 METHOD OF DRILLING: Hand Auger

LOCATION: [illegible]

LOGGED BY: [illegible] GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. 21 B-23 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Concrete		0
								Clay, [illegible]		
								Physically [illegible] 4.5'		
5								5' - [illegible]		5
10										10
15										15
20										20
25										25
30										30
35										35
40								301	000079	40

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: [illegible] METHOD OF DRILLING: [illegible]

LOCATION: Torrance [illegible]

LOGGED BY: [illegible] GROUND ELEVATION: _____

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. 22 B-24 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								[illegible] Rock fill Base		0
5								Physically clear 5' 7' Light brown silty clay, dry, loose, odor like solvent or paint thinner		5
10								10' EOB 11/3/88		10
								11/9/88 continued drilling odor stopped ~ 12 feet		
15										15
20										20
25										25
30										30
35										35
40										40

301 000080

JOB NO.: LOG OF BORING FIGURE:

Coca cola [illegible]

DATE OBSERVED: 11/9/88 METHOD OF DRILLING: Hand Auger

LOCATION: [illegible]

LOGGED BY: GPF GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~23~~ B-25 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Concrete 4" brown, s.m. clay, dense, 6" Base 4"		0
								Sandy CLAY, Dk Brown, sl. moist, stiff dense, sand F tom.		
5										5
								6' Sandy Clay, Light Brown, loose, dry, sand F.		
10										10
15										15
20										20
25										25
30										30
35										35
40								301	000081	40

JOB NO.: LOG OF BORING FIGURE:

DATE OBSERVED: 11/9/88 METHOD OF DRILLING: Hand Auger

LOCATION: Conn. Colo. Torrance

LOGGED BY: C.P.E. GROUND ELEVATION:

DEPTH (FEET)	GRAPHIC LOG	CLASSIFICATION	BLOWS/FOOT	UNDISTURBED SAMPLE	BULK SAMPLE	MOISTURE CONTENT (%)	IN PLACE DRY DENSITY (PCF)	BORING NO. ~~24~~ 26 DESCRIPTION	LABORATORY TEST	DEPTH (FEET)
0								Concrete ~ 6" Brown, mod. moist clay, dense with gravel base		0
5								Sandy Clay, dark Brown, Sl. moist, stiff, dense		5
								5' Sandy Clay, light Brown, loose dry,		
10										10
								7' [illegible]		
15										15
20										20
25										25
30										30
35										35
40								301	000082	40

JOB NO.: LOG OF BORING FIGURE:

GENE F. GALLAGHER
FIRE INSPECTOR I
LOS ANGELES CITY FIRE DEPARTMENT

UNDERGROUND TANK UNIT
BUREAU OF FIRE PREVENTION
(213) 485-7543

200 NORTH MAIN STREET
LOS ANGELES, CALIFORNIA 90012

BUS. PHONE (213) 831-8807

ROBERT J. LUCE

Fixed water by shutting off main 4/13/89

SR. WATER UTILITY
SUPERVISOR
WATER OPERATING DIVISION

DEPARTMENT OF WATER & POWER
CITY OF LOS ANGELES
950 W. 1ST STREET
SAN PEDRO, CALIFORNIA 90731

WESTERN TECHNOLOGIES INC.

3737 East Broadway Road
P.O. Box 21387
Phoenix, Arizona 85036
602-437-3737 • 437-3140 FAX

Pete Beaver
~~Nyle D. Eyton~~
Project Hydrogeologist
Environmental Engineering Services
Steve Myers
or WENDY
Quality Management
Geotechnical, Construction Materials, Chemistry & Environmental Engineering
ARIZONA • CALIFORNIA • COLORADO • NEVADA • NEW MEXICO

DEPARTMENT OF PUBLIC WORKS
BUREAU OF SANITATION

MANUEL C. CRUZ
INDUSTRIAL WASTE INSPECTOR

works for Carl Taig in Glendale

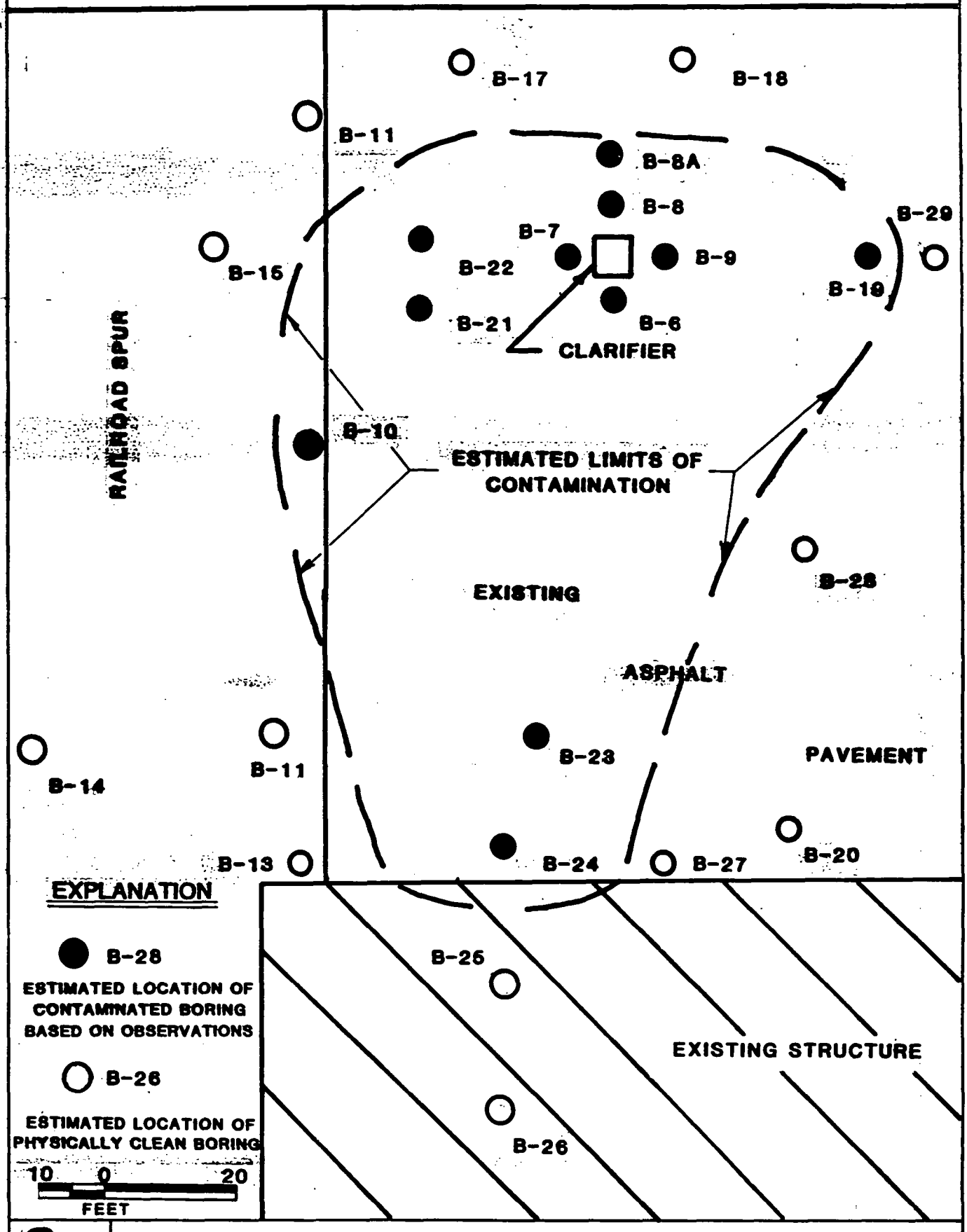
Sampling water

1/IA Floor

ENFORCEMENT DIVISION
ROOM 603, 638 BEACON ST.
SAN PEDRO

OFFICE HOURS: 7:00 A.M. TO NOON
548-7551 OR 52

301 000083



SMC	LIMITS OF CONTAMINATION		
	JOB NO.: 10221-00	DATE: NOVEMBER, 1988	FIGURE:

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT **Georemediation**
14 Hughes, Suite B 101
Irvine, California 92718
Attention: Gary Carlin

DATE March 31, 1989

RECEIVED March 24, 1989

LABORATORY NO. 32277

SAMPLE

Soil: S-1, March 24, 1989
Project: Stoney-Miller Consultants, Inc.
Coca-Cola, Torrance

INVESTIGATION

As Requested

RESULTS

PARAMETER	CONCENTRATION, mg/kg
pH, units (9040)	7.8
Sulfide (9030)	<0.1
Cyanide (9010)	<0.04
Flashpoint	>150° F
Total Petroleum Hydrocarbons (E.P.A. 8015, Modified)	5,136
PCB's (8080)	<0.4

Respectfully submitted,

TRUESDAIL LABORATORIES, INC.

Gregory W. Everett, Project Manager
Water and Waste Laboratory

301 000085

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

APPENDIX

LABROATORY RESULTS

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT **Stoney-Miller Consultants**
14 Hughes, Suite B-101
Irvine, California 92718
Attention: Gary Carlin

DATE October 17, 1988

RECEIVED October 5, 1988

SAMPLE Soils B-3 - 1' from Coca Cola, Torrance

LABORATORY NO. 31002

INVESTIGATION As Requested

RESULTS

Parameter	Milligrams per Kilogram
Total Petroleum Hydrocarbons (418.1)	858
Polychlorinated Biphenyls (8080):	
PCB - 1016	ND <0.1
PCB - 1221	ND <0.1
PCB - 1232	ND <0.1
PCB - 1242	ND <0.1
PCB - 1248	ND <0.1
PCB - 1254	ND <0.1
PCB - 1260	ND <0.1

Respectfully submitted,

TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

301 000087

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

REPORT

DUPLICATE

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Stoney-Miller Consultants, Inc.

DATE October 17, 1988

RECEIVED October 5, 1988

SAMPLE Soil: B-3-1'

LABORATORY NO. 31002

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Phenol	660 ug/kg	ND
bis(2-Chloroethyl) ether	660 ug/kg	ND
2-Chlorophenol	660 ug/kg	ND
1,3-Dichlorobenzene	660 ug/kg	ND
1,4-Dichlorobenzene	660 ug/kg	ND
Benzyl Alcohol	1300 ug/kg	ND
1,2-Dichlorobenzene	660 ug/kg	ND
2-Methylphenol	660 ug/kg	ND
bis(2-Chloroisopropyl) ether	660 ug/kg	ND
4-Methylphenol	660 ug/kg	ND
N-Nitroso-Di-N-propylamine	660 ug/kg	ND
Hexachloroethane	660 ug/kg	ND
Nitrobenzene	660 ug/kg	ND
Isophorone	660 ug/kg	ND
2-Nitrophenol	660 ug/kg	ND
2,4-Dimethylphenol	660 ug/kg	ND
Benzoic Acid	3300 ug/kg	ND
bis(2-Chloroethyoxy)methane	660 ug/kg	ND
2,4-Dichlorophenol	660 ug/kg	ND
1,2,4-Trichlorobenzene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

301 000088

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

TRUESDAIL LABORATORIES, INC.

DUPLICATE

LAB NUMBER: 31002
CLIENT: Stoney-Miller

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Naphthalene	660	ug/kg	9,400
4-Chloroaniline	1300	ug/kg	ND
Hexachlorobutadiene	660	ug/kg	ND
4-Chloro-3-methylphenol	1300	ug/kg	ND
2-Methylnaphthalene	660	ug/kg	ND
Hexachlorocyclopentadiene	660	ug/kg	ND
2,4,6-Trichlorophenol	660	ug/kg	ND
2,4,5-Trichlorophenol	660	ug/kg	ND
2-Chloronaphthalene	660	ug/kg	ND
2-Nitroaniline	3300	ug/kg	ND
Dimethyl phthalate	660	ug/kg	ND
Acenaphthylene	660	ug/kg	ND
3-Nitroaniline	3300	ug/kg	ND
Acenaphthene	660	ug/kg	ND
2,4-Dinitrophenol	3300	ug/kg	ND
4-Nitrophenol	3300	ug/kg	ND
Dibenzofuran	660	ug/kg	ND
2,4-Dinitrotoluene	660	ug/kg	ND
2,6-Dinitrotoluene	660	ug/kg	ND
Diethylphthalate	660	ug/kg	ND
4-Chlorophenyl phenyl ether	660	ug/kg	ND
Fluorene	660	ug/kg	ND
4-Nitroaniline	3300	ug/kg	ND
4,6-Dinitro-2-methylphenol	3300	ug/kg	ND
N-Nitrosodiphenylamine	660	ug/kg	ND
4-Bromophenyl phenyl ether	660	ug/kg	ND
Hexachlorobenzene	660	ug/kg	ND
Pentachlorophenol	3300	ug/kg	ND
Phenanthrene	660	ug/kg	7,700
Anthracene	660	ug/kg	ND
Di-n-butylphthalate	660	ug/kg	ND
Fluoranthene	660	ug/kg	ND
Pyrene	660	ug/kg	ND
Butyl benzyl phthalate	660	ug/kg	ND
3,3'-Dichlorobenzidine	1300	ug/kg	ND
Benzo(a)anthracene	660	ug/kg	ND
bis(2-ethylhexyl)phthalate	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

TRUESDAIL LABORATORIES, INC.

DUPLICATE

LAB NUMBER: 31002
CLIENT: Stoney-Miller

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit* ***	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.
** ND = Not detected, below detection limit.

*** The detection limits were multiplied by 100X.

Respectfully submitted,

TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-2

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

301 000092

TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-3

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Naphthalene	660	ug/kg	55,500
4-Chloroaniline	1300	ug/kg	ND
Hexachlorobutadiene	660	ug/kg	ND
4-Chloro-3-methylphenol	1300	ug/kg	ND
2-Methylnaphthalene	660	ug/kg	32,600
Hexachlorocyclopentadiene	660	ug/kg	ND
2,4,6-Trichlorophenol	660	ug/kg	ND
2,4,5-Trichlorophenol	660	ug/kg	ND
2-Chloronaphthalene	660	ug/kg	ND
2-Nitroaniline	3300	ug/kg	ND
Dimethyl phthalate	660	ug/kg	ND
Acenaphthylene	660	ug/kg	16,600
3-Nitroaniline	3300	ug/kg	ND
Acenaphthene	660	ug/kg	ND
2,4-Dinitrophenol	3300	ug/kg	ND
4-Nitrophenol	3300	ug/kg	ND
Dibenzofuran	660	ug/kg	ND
2,4-Dinitrotoluene	660	ug/kg	ND
2,6-Dinitrotoluene	660	ug/kg	ND
Diethylphthalate	660	ug/kg	ND
4-Chlorophenyl phenyl ether	660	ug/kg	ND
Fluorene	660	ug/kg	15,100
4-Nitroaniline	3300	ug/kg	ND
4,6-Dinitro-2-methylphenol	3300	ug/kg	ND
N-Nitrosodiphenylamine	660	ug/kg	ND
4-Bromophenyl phenyl ether	660	ug/kg	ND
Hexachlorobenzene	660	ug/kg	ND
Pentachlorophenol	3300	ug/kg	ND
Phenanthrene	660	ug/kg	32,400
Anthracene	660	ug/kg	ND
Di-n-butylphthalate	660	ug/kg	ND
Fluoranthene	660	ug/kg	ND
Pyrene	660	ug/kg	10,100
Butyl benzyl phthalate	660	ug/kg	ND
3,3'-Dichlorobenzidine	1300	ug/kg	ND
Benzo(a)anthracene	660	ug/kg	ND
bis(2-ethylhexyl)phthalate	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-3

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

*** Detection limits are multiplied by 10X.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Stoney-Miller Consultants, Inc.
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE October 25, 1988

RECEIVED October 17, 1988

SAMPLE B-8-15'

LABORATORY NO. 31100-4

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Phenol	660	ug/kg	ND
bis(2-Chloroethyl) ether	660	ug/kg	ND
2-Chlorophenol	600	ug/kg	ND
1,3-Dichlorobenzene	660	ug/kg	ND
1,4-Dichlorobenzene	660	ug/kg	ND
Benzyl Alcohol	1300	ug/kg	ND
1,2-Dichlorobenzene	660	ug/kg	ND
2-Methylphenol	660	ug/kg	ND
bis(2-Chloroisopropyl) ether	660	ug/kg	ND
4-Methylphenol	660	ug/kg	ND
N-Nitroso-Di-N-propylamine	660	ug/kg	ND
Hexachloroethane	660	ug/kg	ND
Nitrobenzene	660	ug/kg	ND
Isophorone	660	ug/kg	ND
2-Nitrophenol	660	ug/kg	ND
2,4-Dimethylphenol	660	ug/kg	ND
Benzoic Acid	3300	ug/kg	ND
bis(2-Chloroethyoxy)methane	660	ug/kg	ND
2,4-Dichlorophenol	660	ug/kg	ND
1,2,4-Trichlorobenzene	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

301 000095

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TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-4

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Naphthalene	660	ug/kg	ND
4-Chloroaniline	1300	ug/kg	ND
Hexachlorobutadiene	660	ug/kg	ND
4-Chloro-3-methylphenol	1300	ug/kg	ND
2-Methylnaphthalene	660	ug/kg	ND
Hexachlorocyclopentadiene	660	ug/kg	ND
2,4,6-Trichlorophenol	660	ug/kg	ND
2,4,5-Trichlorophenol	660	ug/kg	ND
2-Chloronaphthalene	660	ug/kg	ND
2-Nitroaniline	3300	ug/kg	ND
Dimethyl phthalate	660	ug/kg	ND
Acenaphthylene	660	ug/kg	ND
3-Nitroaniline	3300	ug/kg	ND
Acenaphthene	660	ug/kg	ND
2,4-Dinitrophenol	3300	ug/kg	ND
4-Nitrophenol	3300	ug/kg	ND
Dibenzofuran	660	ug/kg	ND
2,4-Dinitrotoluene	660	ug/kg	ND
2,6-Dinitrotoluene	660	ug/kg	ND
Diethylphthalate	660	ug/kg	ND
4-Chlorophenyl phenyl ether	660	ug/kg	ND
Fluorene	660	ug/kg	ND
4-Nitroaniline	3300	ug/kg	ND
4,6-Dinitro-2-methylphenol	3300	ug/kg	ND
N-Nitrosodiphenylamine	660	ug/kg	ND
4-Bromophenyl phenyl ether	660	ug/kg	ND
Hexachlorobenzene	660	ug/kg	ND
Pentachlorophenol	3300	ug/kg	ND
Phenanthrene	660	ug/kg	ND
Anthracene	660	ug/kg	ND
Di-n-butylphthalate	660	ug/kg	ND
Fluoranthene	660	ug/kg	ND
Pyrene	660	ug/kg	ND
Butyl benzyl phthalate	660	ug/kg	ND
3,3'-Dichlorobenzidine	1300	ug/kg	ND
Benzo(a)anthracene	660	ug/kg	ND
bis(2-ethylhexyl)phthalate	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-4

INVESTIGATION: **Base Neutrals Acid Extractables by GC/MS (EPA 8270)**

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1864
CABLE: TRUELABB

CLIENT Stoney-Miller Consultants, Inc.
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE October 25, 1988

RECEIVED October 17, 1988

SAMPLE B-9-5'

LABORATORY NO. 31100-5

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Phenol	660	ug/kg	ND
bis(2-Chloroethyl) ether	660	ug/kg	ND
2-Chlorophenol	600	ug/kg	ND
1,3-Dichlorobenzene	660	ug/kg	ND
1,4-Dichlorobenzene	660	ug/kg	ND
Benzyl Alcohol	1300	ug/kg	ND
1,2-Dichlorobenzene	660	ug/kg	ND
2-Methylphenol	660	ug/kg	ND
bis(2-Chloroisopropyl) ether	660	ug/kg	ND
4-Methylphenol	660	ug/kg	ND
N-Nitroso-Di-N-propylamine	660	ug/kg	ND
Hexachloroethane	660	ug/kg	ND
Nitrobenzene	660	ug/kg	ND
Isophorone	660	ug/kg	ND
2-Nitrophenol	660	ug/kg	ND
2,4-Dimethylphenol	660	ug/kg	ND
Benzoic Acid	3300	ug/kg	ND
bis(2-Chloroethyoxy)methane	660	ug/kg	ND
2,4-Dichlorophenol	660	ug/kg	ND
1,2,4-Trichlorobenzene	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-5

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Naphthalene	660	ug/kg	ND
4-Chloroaniline	1300	ug/kg	ND
Hexachlorobutadiene	660	ug/kg	ND
4-Chloro-3-methylphenol	1300	ug/kg	ND
2-Methylnaphthalene	660	ug/kg	ND
Hexachlorocyclopentadiene	660	ug/kg	ND
2,4,6-Trichlorophenol	660	ug/kg	ND
2,4,5-Trichlorophenol	660	ug/kg	ND
2-Chloronaphthalene	660	ug/kg	ND
2-Nitroaniline	3300	ug/kg	ND
Dimethyl phthalate	660	ug/kg	ND
Acenaphthylene	660	ug/kg	ND
3-Nitroaniline	3300	ug/kg	ND
Acenaphthene	660	ug/kg	ND
2,4-Dinitrophenol	3300	ug/kg	ND
4-Nitrophenol	3300	ug/kg	ND
Dibenzofuran	660	ug/kg	ND
2,4-Dinitrotoluene	660	ug/kg	ND
2,6-Dinitrotoluene	660	ug/kg	ND
Diethylphthalate	660	ug/kg	ND
4-Chlorophenyl phenyl ether	660	ug/kg	ND
Fluorene	660	ug/kg	ND
4-Nitroaniline	3300	ug/kg	ND
4,6-Dinitro-2-methylphenol	3300	ug/kg	ND
N-Nitrosodiphenylamine	660	ug/kg	ND
4-Bromophenyl phenyl ether	660	ug/kg	ND
Hexachlorobenzene	660	ug/kg	ND
Pentachlorophenol	3300	ug/kg	ND
Phenanthrene	660	ug/kg	ND
Anthracene	660	ug/kg	ND
Di-n-butylphthalate	660	ug/kg	ND
Fluoranthene	660	ug/kg	ND
Pyrene	660	ug/kg	ND
Butyl benzyl phthalate	660	ug/kg	ND
3,3'-Dichlorobenzidine	1300	ug/kg	ND
Benzo(a)anthracene	660	ug/kg	ND
bis(2-ethylhexyl)phthalate	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

SDAIL LABORATORIES, INC.

LAB NUMBER: 31100-5

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

*** Detection limits are multiplied by 10X.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Stoney-Miller Consultants, Inc.
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE October 25, 1988

RECEIVED October 17, 1988

LABORATORY NO. 31100-6

SAMPLE B-9-15'

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Phenol	660	ug/kg	ND
bis(2-Chloroethyl) ether	660	ug/kg	ND
2-Chlorophenol	600	ug/kg	ND
1,3-Dichlorobenzene	660	ug/kg	ND
1,4-Dichlorobenzene	660	ug/kg	ND
Benzyl Alcohol	1300	ug/kg	ND
1,2-Dichlorobenzene	660	ug/kg	ND
2-Methylphenol	660	ug/kg	ND
bis(2-Chloroisopropyl) ether	660	ug/kg	ND
4-Methylphenol	660	ug/kg	ND
N-Nitroso-Di-N-propylamine	660	ug/kg	ND
Hexachloroethane	660	ug/kg	ND
Nitrobenzene	660	ug/kg	ND
Isophorone	660	ug/kg	ND
2-Nitrophenol	660	ug/kg	ND
2,4-Dimethylphenol	660	ug/kg	ND
Benzoic Acid	3300	ug/kg	ND
bis(2-Chloroethyoxy)methane	660	ug/kg	ND
2,4-Dichlorophenol	660	ug/kg	ND
1,2,4-Trichlorobenzene	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-6

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Naphthalene	660	ug/kg	ND
4-Chloroaniline	1300	ug/kg	ND
Hexachlorobutadiene	660	ug/kg	ND
4-Chloro-3-methylphenol	1300	ug/kg	ND
2-Methylnaphthalene	660	ug/kg	ND
Hexachlorocyclopentadiene	660	ug/kg	ND
2,4,6-Trichlorophenol	660	ug/kg	ND
2,4,5-Trichlorophenol	660	ug/kg	ND
2-Chloronaphthalene	660	ug/kg	ND
2-Nitroaniline	3300	ug/kg	ND
Dimethyl phthalate	660	ug/kg	ND
Acenaphthylene	660	ug/kg	ND
3-Nitroaniline	3300	ug/kg	ND
Acenaphthene	660	ug/kg	ND
2,4-Dinitrophenol	3300	ug/kg	ND
4-Nitrophenol	3300	ug/kg	ND
Dibenzofuran	660	ug/kg	ND
2,4-Dinitrotoluene	660	ug/kg	ND
2,6-Dinitrotoluene	660	ug/kg	ND
Diethylphthalate	660	ug/kg	ND
4-Chlorophenyl phenyl ether	660	ug/kg	ND
Fluorene	660	ug/kg	ND
4-Nitroaniline	3300	ug/kg	ND
4,6-Dinitro-2-methylphenol	3300	ug/kg	ND
N-Nitrosodiphenylamine	660	ug/kg	ND
4-Bromophenyl phenyl ether	660	ug/kg	ND
Hexachlorobenzene	660	ug/kg	ND
Pentachlorophenol	3300	ug/kg	ND
Phenanthrene	660	ug/kg	ND
Anthracene	660	ug/kg	ND
Di-n-butylphthalate	660	ug/kg	ND
Fluoranthene	660	ug/kg	ND
Pyrene	660	ug/kg	ND
Butyl benzyl phthalate	660	ug/kg	ND
3,3'-Dichlorobenzidine	1300	ug/kg	ND
Benzo(a)anthracene	660	ug/kg	ND
bis(2-ethylhexyl)phthalate	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-6

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Stoney-Miller Consultants, Inc.
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE October 25, 1988

RECEIVED October 17, 1988

LABORATORY NO. 31100-8

SAMPLE B-10-10'

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Phenol	660 ug/kg	ND
bis(2-Chloroethyl) ether	660 ug/kg	ND
2-Chlorophenol	600 ug/kg	ND
1,3-Dichlorobenzene	660 ug/kg	ND
1,4-Dichlorobenzene	660 ug/kg	ND
Benzyl Alcohol	1300 ug/kg	ND
1,2-Dichlorobenzene	660 ug/kg	ND
2-Methylphenol	660 ug/kg	ND
bis(2-Chloroisopropyl) ether	660 ug/kg	ND
4-Methylphenol	660 ug/kg	ND
N-Nitroso-Di-N-propylamine	660 ug/kg	ND
Hexachloroethane	660 ug/kg	ND
Nitrobenzene	660 ug/kg	ND
Isophorone	660 ug/kg	ND
2-Nitrophenol	660 ug/kg	ND
2,4-Dimethylphenol	660 ug/kg	ND
Benzoic Acid	3300 ug/kg	ND
bis(2-Chloroethyoxy)methane	660 ug/kg	ND
2,4-Dichlorophenol	660 ug/kg	ND
1,2,4-Trichlorobenzene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-8

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Naphthalene	660	ug/kg	ND
4-Chloroaniline	1300	ug/kg	ND
Hexachlorobutadiene	660	ug/kg	ND
4-Chloro-3-methylphenol	1300	ug/kg	ND
2-Methylnaphthalene	660	ug/kg	ND
Hexachlorocyclopentadiene	660	ug/kg	ND
2,4,6-Trichlorophenol	660	ug/kg	ND
2,4,5-Trichlorophenol	660	ug/kg	ND
2-Chloronaphthalene	660	ug/kg	ND
2-Nitroaniline	3300	ug/kg	ND
Dimethyl phthalate	660	ug/kg	ND
Acenaphthylene	660	ug/kg	ND
3-Nitroaniline	3300	ug/kg	ND
Acenaphthene	660	ug/kg	ND
2,4-Dinitrophenol	3300	ug/kg	ND
4-Nitrophenol	3300	ug/kg	ND
Dibenzofuran	660	ug/kg	ND
2,4-Dinitrotoluene	660	ug/kg	ND
2,6-Dinitrotoluene	660	ug/kg	ND
Diethylphthalate	660	ug/kg	ND
4-Chlorophenyl phenyl ether	660	ug/kg	ND
Fluorene	660	ug/kg	ND
4-Nitroaniline	3300	ug/kg	ND
4,6-Dinitro-2-methylphenol	3300	ug/kg	ND
N-Nitrosodiphenylamine	660	ug/kg	ND
4-Bromophenyl phenyl ether	660	ug/kg	ND
Hexachlorobenzene	660	ug/kg	ND
Pentachlorophenol	3300	ug/kg	ND
Phenanthrene	660	ug/kg	ND
Anthracene	660	ug/kg	ND
Di-n-butylphthalate	660	ug/kg	ND
Fluoranthene	660	ug/kg	ND
Pyrene	660	ug/kg	ND
Butyl benzyl phthalate	660	ug/kg	ND
3,3'-Dichlorobenzidine	1300	ug/kg	ND
Benzo(a)anthracene	660	ug/kg	ND
bis(2-ethylhexyl)phthalate	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-8

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Stoney-Miller Consultants, Inc.
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE October 25, 1988

RECEIVED October 17, 1988

SAMPLE B-11-8'

LABORATORY NO. 31100-9

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Phenol	660	ug/kg	ND
bis(2-Chloroethyl) ether	660	ug/kg	ND
2-Chlorophenol	600	ug/kg	ND
1,3-Dichlorobenzene	660	ug/kg	ND
1,4-Dichlorobenzene	660	ug/kg	ND
Benzyl Alcohol	1300	ug/kg	ND
1,2-Dichlorobenzene	660	ug/kg	ND
2-Methylphenol	660	ug/kg	ND
bis(2-Chloroisopropyl) ether	660	ug/kg	ND
4-Methylphenol	660	ug/kg	ND
N-Nitroso-Di-N-propylamine	660	ug/kg	ND
Hexachloroethane	660	ug/kg	ND
Nitrobenzene	660	ug/kg	ND
Isophorone	660	ug/kg	ND
2-Nitrophenol	660	ug/kg	ND
2,4-Dimethylphenol	660	ug/kg	ND
Benzoic Acid	3300	ug/kg	ND
bis(2-Chloroethyoxy)methane	660	ug/kg	ND
2,4-Dichlorophenol	660	ug/kg	ND
1,2,4-Trichlorobenzene	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

TRUESDAIL LABORATORIES, INC.

LAB NUMBER: 31100-9

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*		Concentration (ug/kg)**
Naphthalene	660	ug/kg	ND
4-Chloroaniline	1300	ug/kg	ND
Hexachlorobutadiene	660	ug/kg	ND
4-Chloro-3-methylphenol	1300	ug/kg	ND
2-Methylnaphthalene	660	ug/kg	ND
Hexachlorocyclopentadiene	660	ug/kg	ND
2,4,6-Trichlorophenol	660	ug/kg	ND
2,4,5-Trichlorophenol	660	ug/kg	ND
2-Chloronaphthalene	660	ug/kg	ND
2-Nitroaniline	3300	ug/kg	ND
Dimethyl phthalate	660	ug/kg	ND
Acenaphthylene	660	ug/kg	ND
3-Nitroaniline	3300	ug/kg	ND
Acenaphthene	660	ug/kg	ND
2,4-Dinitrophenol	3300	ug/kg	ND
4-Nitrophenol	3300	ug/kg	ND
Dibenzofuran	660	ug/kg	ND
2,4-Dinitrotoluene	660	ug/kg	ND
2,6-Dinitrotoluene	660	ug/kg	ND
Diethylphthalate	660	ug/kg	ND
4-Chlorophenyl phenyl ether	660	ug/kg	ND
Fluorene	660	ug/kg	ND
4-Nitroaniline	3300	ug/kg	ND
4,6-Dinitro-2-methylphenol	3300	ug/kg	ND
N-Nitrosodiphenylamine	660	ug/kg	ND
4-Bromophenyl phenyl ether	660	ug/kg	ND
Hexachlorobenzene	660	ug/kg	ND
Pentachlorophenol	3300	ug/kg	ND
Phenanthrene	660	ug/kg	ND
Anthracene	660	ug/kg	ND
Di-n-butylphthalate	660	ug/kg	ND
Fluoranthene	660	ug/kg	ND
Pyrene	660	ug/kg	ND
Butyl benzyl phthalate	660	ug/kg	ND
3,3'-Dichlorobenzidine	1300	ug/kg	ND
Benzo(a)anthracene	660	ug/kg	ND
bis(2-ethylhexyl)phthalate	660	ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

TRUESDAIL LABORATORIES, .NC.

LAB NUMBER: 31100-9

INVESTIGATION: Base Neutrals Acid Extractables by GC/MS (EPA 8270)

Constituent	Approximate Detection Limit*	Concentration (ug/kg)**
Chrysene	660 ug/kg	ND
Di-n-octyl phthalate	660 ug/kg	ND
Benzo(b)fluoranthene	660 ug/kg	ND
Benzo(k)fluoranthene	660 ug/kg	ND
Benzo(a)pyrene	660 ug/kg	ND
Indeno(1,2,3-cd)pyrene	660 ug/kg	ND
Dibenz(a,h)anthracene	660 ug/kg	ND
Benzo(g,h,i)perylene	660 ug/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Julia Nayberg

Julia Nayberg, Manager
Inorganic Chemistry

INVOICE

TRUESDAIL LABORATORIES, INC

TAX I. D. # 95-1308430

CHEMISTS - MICROBIOLOGISTS - ENGINEERS

RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

RECEIVED JUL 26 1989

Stoney Miller, Consultants
14 Hughes, Suite B-101
Irvine, California 92718
Attention: ACCOUNTS PAYABLE

INVOICE NO. 105991

ORDER NO.

DATE July 25 1989

To Professional Services **LABORATORY NUMBER 34136**

E.F.
10221-00

Project Name: Coca-Cola, Torrance
Ten Soils ---

4 EPA 8270 @ $3450 Ea.	$1,800.
10 EPA 418.1 TPH Analyses @ $57 Ea	570.

TOTAL INVOICE: $2,370.

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301 000110

INVOICE

TRUESDAIL LABORATORIES, INC.

TAX I. D. # 95-1308430

CHEMISTS - MICROBIOLOGISTS - ENGINEERS

RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

Stoney Miller, Consultants
14 Hughes, Suite B-101
Irvine, California 92718
Attention: ACCOUNTS PAYABLE

INVOICE NO. 105991

ORDER NO.

DATE July 25 1989

To Professional Services LABORATORY NUMBER 34136

Project Name: Coca-Cola, Torrance
Ten Soils ---

4 EPA 8270 @ $3450 Ea.	$1,800.
10 EPA 418.1 TPH Analyses @ $57 Ea	570.
TOTAL INVOICE:	$2,370.

THIS PROFESSIONAL SERVICE BILL IS DUE UPON PRESENTATION.

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[redacted]

REPORT

TRUESDAIL LABORATORIES, INC.

RECEIVED JUL 26 1989

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT: **Georemediation**
14 Hughes, Suite B 101
Irvine, California 92718
Attention: GARY CARLIN

DATE: July 25, 1989

RECEIVED: July 17, 1989

LABORATORY NO. 34136

SAMPLE: **Ten Soils**
Project: Coca-Cola, Torrance
Stoney-Miller, Consultants

INVESTIGATION: **EPA 418.1 / Total Petroleum Hydrocarbons**

RESULTS

Sample Identification	CONCENTRATION, mg/kg
C.C.P. #1	<1.61
C.C.P. #2	3,680
C.C.P. #3	3,990
C.C.P. #4	<1.61
C.C.P. #5	1,640
C.C.P. #6	5,960
C.C.P. #7	<1.61
C.C.P. #8	2,190
C.C.P.#9	<1.61
C.C.P. #10	<1.61

301 000112

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

Georemediation
Laboratory Number 34136
July 25, 1989

Total Petroleum Hydrocarbons (EPA 418.1, Modified):

The total petroleum hydrocarbons analyzed in soils utilizes an infrared method similar to the procedure designated for waters (E.P.A. 418.1). The soils are extracted with freon TF on an equal weight-to-volume basis with anhydrous sodium sulfate added to aid in the extraction. The method detection limit is 1 mg/kg. All of the results have been blank corrected.

Respectfully submitted,

TRUESDAIL LABORATORIES, INC.

Gregory W. Everett, Project Manager
Water and Waste Laboratory

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT: **Georemediation**
14 Hughes, Suite B-101
Irvine, California 92718
Attention: GARY CARLIN

DATE: July 25, 1987

RECEIVED: July 17

SAMPLE: **C.C.P. #2**
Project: Coca-Cola, Torrance

LABORATORY NO. 34136-2

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Dectection Limit*		Concentration (mg/kg)**
Phenol	1.98	mg/kg	ND
bis(2-Chloroethyl) ether	1.98	mg/kg	ND
2-Chlorophenol	1.98	mg/kg	ND
1,3-Dichlorobenzene	1.98	mg/kg	ND
1,4-Dichlorobenzene	1.98	mg/kg	ND
Benzyl Alcohol	3.90	mg/kg	ND
1,2-Dichlorobenzene	1.98	mg/kg	ND
2-Methylphenol	1.98	mg/kg	ND
bis(2-Chloroisopropyl) ether	1.98	mg/kg	ND
4-Methylphenol	1.98	mg/kg	ND
N-Nitroso-Di-N-propylamine	1.98	mg/kg	ND
Hexachloroethane	1.98	mg/kg	ND
Nitrobenzene	1.98	mg/kg	ND
Isophorone	1.98	mg/kg	ND
2-Nitrophenol	1.98	mg/kg	ND
2,4-Dimethylphenol	1.98	mg/kg	ND
Benzoic Acid	9.90	mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98	mg/kg	ND
2,4-Dichlorophenol	1.98	mg/kg	ND
1,2,4-Trichlorobenzene	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

301 000114

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Constituent	Approximate Detection Limit*		Concentration (mg/kg) **
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Constituent	Approximate Detection Limit*		Concentration (mg/kg)**
Chrysene	1.98	mg/kg	ND
Di-n-octyl phthalate	1.98	mg/kg	ND
Benzo(b)fluoranthene	1.98	mg/kg	ND
Benzo(k)fluoranthene	1.98	mg/kg	ND
Benzo(a)pyrene	1.98	mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98	mg/kg	ND
Dibenz(a,h)anthracene	1.98	mg/kg	ND
Benzo(g,h,i)perylene	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett,
Project Manager
Industrial Waste

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT: Georemediation
14 Hughes, Suite B-101
Irvine, California 92718
Attention: GARY CARLIN

DATE: July 25, 1987

RECEIVED: July 17

SAMPLE: C.C.P. #4
Project: Coca-Cola, Torrance

LABORATORY NO. 34136-4

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Dectection Limit*		Concentration (mg/kg)**
Phenol	1.98	mg/kg	ND
bis(2-Chloroethyl) ether	1.98	mg/kg	ND
2-Chlorophenol	1.98	mg/kg	ND
1,3-Dichlorobenzene	1.98	mg/kg	ND
1,4-Dichlorobenzene	1.98	mg/kg	ND
Benzyl Alcohol	3.90	mg/kg	ND
1,2-Dichlorobenzene	1.98	mg/kg	ND
2-Methylphenol	1.98	mg/kg	ND
bis(2-Chloroisopropyl) ether	1.98	mg/kg	ND
4-Methylphenol	1.98	mg/kg	ND
N-Nitroso-Di-N-propylamine	1.98	mg/kg	ND
Hexachloroethane	1.98	mg/kg	ND
Nitrobenzene	1.98	mg/kg	ND
Isophorone	1.98	mg/kg	ND
2-Nitrophenol	1.98	mg/kg	ND
2,4-Dimethylphenol	1.98	mg/kg	ND
Benzoic Acid	9.90	mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98	mg/kg	ND
2,4-Dichlorophenol	1.98	mg/kg	ND
1,2,4-Trichlorobenzene	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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Constituent	Approximate Detection Limit*		Concentration (mg/kg) **
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Constituent	Approximate Detection Limit*		Concentration (mg/kg)**
Chrysene	1.98	mg/kg	ND
Di-n-octyl phthalate	1.98	mg/kg	ND
Benzo(b)fluoranthene	1.98	mg/kg	ND
Benzo(k)fluoranthene	1.98	mg/kg	ND
Benzo(a)pyrene	1.98	mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98	mg/kg	ND
Dibenz(a,h)anthracene	1.98	mg/kg	ND
Benzo(g,h,i)perylene	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett,
Project Manager
Industrial Waste

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT: Georemediation
14 Hughes, Suite B-101
Irvine, California 92718
Attention: GARY CARLIN

DATE: July 25, 1987

RECEIVED: July 17

SAMPLE: C.C.P. #6
Project: Coca-Cola, Torrance

LABORATORY NO. 34136-6

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Dectection Limit*		Concentration (mg/kg)**
Phenol	19.8	mg/kg	ND
bis(2-Chloroethyl) ether	19.8	mg/kg	ND
2-Chlorophenol	19.8	mg/kg	ND
1,3-Dichlorobenzene	19.8	mg/kg	ND
1,4-Dichlorobenzene	19.8	mg/kg	ND
Benzyl Alcohol	3.90	mg/kg	ND
1,2-Dichlorobenzene	19.8	mg/kg	ND
2-Methylphenol	19.8	mg/kg	ND
bis(2-Chloroisopropyl) ether	19.8	mg/kg	ND
4-Methylphenol	19.8	mg/kg	ND
N-Nitroso-Di-N-propylamine	19.8	mg/kg	ND
Hexachloroethane	19.8	mg/kg	ND
Nitrobenzene	19.8	mg/kg	ND
Isophorone	19.8	mg/kg	ND
2-Nitrophenol	19.8	mg/kg	ND
2,4-Dimethylphenol	19.8	mg/kg	ND
Benzoic Acid	9.90	mg/kg	ND
bis(2-Chloroethyoxy)methane	19.8	mg/kg	ND
2,4-Dichlorophenol	19.8	mg/kg	ND
1,2,4-Trichlorobenzene	19.8	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

301 000120

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Constituent	Approximate Detection Limit*		Concentration (mg/kg) **
Naphthalene	19.8	mg/kg	342
4-Chloroaniline	39.0	mg/kg	ND
Hexachlorobutadiene	19.8	mg/kg	ND
4-Chloro-3-methylphenol	39.0	mg/kg	ND
2-Methylnaphthalene	19.8	mg/kg	204
Hexachlorocyclopentadiene	19.8	mg/kg	ND
2,4,6-Trichlorophenol	19.8	mg/kg	ND
2,4,5-Trichlorophenol	19.8	mg/kg	ND
2-Chloronaphthalene	19.8	mg/kg	ND
2-Nitroaniline	99.0	mg/kg	ND
Dimethyl phthalate	19.8	mg/kg	ND
Acenaphthylene	19.8	mg/kg	ND
3-Nitroaniline	99.0	mg/kg	ND
Acenaphthene	19.8	mg/kg	ND
2,4-Dinitrophenol	99.0	mg/kg	ND
4-Nitrophenol	99.0	mg/kg	ND
Dibenzofuran	19.8	mg/kg	ND
2,4-Dinitrotoluene	19.8	mg/kg	ND
2,6-Dinitrotoluene	19.8	mg/kg	ND
Diethylphthalate	19.8	mg/kg	ND
4-Chlorophenyl phenyl ether	19.8	mg/kg	ND
Fluorene	19.8	mg/kg	52.8
4-Nitroaniline	99.0	mg/kg	ND
4,6-Dinitro-2-methylphenol	99.0	mg/kg	ND
N-Nitrosodiphenylamine	19.8	mg/kg	ND
4-Bromophenyl phenyl ether	19.8	mg/kg	ND
Hexachlorobenzene	19.8	mg/kg	ND
Pentachlorophenol	99.0	mg/kg	ND
Phenanthrene	19.8	mg/kg	93.0
Anthracene	19.8	mg/kg	ND
Di-n-butylphthalate	19.8	mg/kg	ND
Fluoranthene	19.8	mg/kg	ND
Pyrene	19.8	mg/kg	ND
Butyl benzyl phthalate	19.8	mg/kg	ND
3,3'-Dichlorobenzidine	39.0	mg/kg	ND
Benzo(a)anthracene	19.8	mg/kg	ND
bis(2-ethylhexyl)phthalate	19.8	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Constituent	Approximate Detection Limit*		Concentration (mg/kg)**
Chrysene	19.8	mg/kg	ND
Di-n-octyl phthalate	19.8	mg/kg	ND
Benzo(b)fluoranthene	19.8	mg/kg	ND
Benzo(k)fluoranthene	19.8	mg/kg	ND
Benzo(a)pyrene	19.8	mg/kg	ND
Indeno(1,2,3-cd)pyrene	19.8	mg/kg	ND
Dibenz(a,h)anthracene	19.8	mg/kg	ND
Benzo(g,h,i)perylene	19.8	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett,
Project Manager
Industrial Waste

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

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TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT: Georemediation
14 Hughes, Suite B-101
Irvine, California 92718
Attention: GARY CARLIN

DATE: July 25, 1987

RECEIVED: July 17

LABORATORY NO. 34136-8

SAMPLE: C.C.P. #8
Project: Coca-Cola, Torrance

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Dectection Limit*		Concentration (mg/kg)**
Phenol	1.98	mg/kg	ND
bis(2-Chloroethyl) ether	1.98	mg/kg	ND
2-Chlorophenol	1.98	mg/kg	ND
1,3-Dichlorobenzene	1.98	mg/kg	ND
1,4-Dichlorobenzene	1.98	mg/kg	ND
Benzyl Alcohol	3.90	mg/kg	ND
1,2-Dichlorobenzene	1.98	mg/kg	ND
2-Methylphenol	1.98	mg/kg	ND
bis(2-Chloroisopropyl) ether	1.98	mg/kg	ND
4-Methylphenol	1.98	mg/kg	ND
N-Nitroso-Di-N-propylamine	1.98	mg/kg	ND
Hexachloroethane	1.98	mg/kg	ND
Nitrobenzene	1.98	mg/kg	ND
Isophorone	1.98	mg/kg	ND
2-Nitrophenol	1.98	mg/kg	ND
2,4-Dimethylphenol	1.98	mg/kg	ND
Benzoic Acid	9.90	mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98	mg/kg	ND
2,4-Dichlorophenol	1.98	mg/kg	ND
1,2,4-Trichlorobenzene	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

301 000123

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Constituent	Approximate Detection Limit*		Concentration (mg/kg) **
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Constituent	Approximate Detection Limit*		Concentration (mg/kg)**
Chrysene	1.98	mg/kg	ND
Di-n-octyl phthalate	1.98	mg/kg	ND
Benzo(b)fluoranthene	1.98	mg/kg	ND
Benzo(k)fluoranthene	1.98	mg/kg	ND
Benzo(a)pyrene	1.98	mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98	mg/kg	ND
Dibenz(a,h)anthracene	1.98	mg/kg	ND
Benzo(g,h,i)perylene	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett,
Project Manager
Industrial Waste

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Georemediation
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE 4 Soil samples Project: Coca-Cola, Torrance

LABORATORY NO. 33359-1
2,5,6

INVESTIGATION Total Petroleum Hydrocarbons (418.1)

RESULTS

Sample I.D.	Concentration mg/kg
E-1,2'	24
E-2',3'	2,760
E-5,2'	1,340
E-4,4'	279

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Greg W. Everett
Project Manager

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity matter without prior written authorization from these Laboratories.

C.F. 10221-00

INVOICE

TRUESDAIL LABORATORIES, INC.

TAX I. D. # 95-1308430

CHEMISTS - MICROBIOLOGISTS - ENGINEERS

RESEARCH — DEVELOPMENT — TESTING

DUPLICATE

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

Stoney-Miller
14 Hughes, Suite B101
Irvine, CA 92718

Attention: Gary Carlin

INVOICE NO. 105373

ORDER NO.

DATE June 27, 1989

To Professional Services

LABORATORY NUMBER 33359-1,2,5,6
Project Name:
Project No.:

QTY.	DESCRIPTION OR TEST	$/EACH	SUBTOTAL
4	EDA 8270 + 50% Rush	$675	$2,700
4	TPH (418.1) + 50% Rush	$86	$344
	TOTAL AMOUNT DUE		**$3,044.00**

THIS PROFESSIONAL SERVICE BILL IS DUE UPON PRESENTATION.

The above charge does not include the right to reproduce or use, in whole or in part, for advertising or publicity purposes, the report or reports of these Laboratories without obtaining prior written authorization therefor. The liability of these Laboratories for the services covered by this invoice shall in no event exceed the amount of this invoice.

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Naphthalene	1.98 mg/kg	ND
4-Chloroaniline	3.90 mg/kg	ND
Hexachlorobutadiene	1.98 mg/kg	ND
4-Chloro-3-methylphenol	3.90 mg/kg	ND
2-Methylnaphthalene	1.98 mg/kg	ND
Hexachlorocyclopentadiene	1.98 mg/kg	ND
2,4,6-Trichlorophenol	1.98 mg/kg	ND
2,4,5-Trichlorophenol	1.98 mg/kg	ND
2-Chloronaphthalene	1.98 mg/kg	ND
2-Nitroaniline	9.90 mg/kg	ND
Dimethyl phthalate	1.98 mg/kg	ND
Acenaphthylene	1.98 mg/kg	ND
3-Nitroaniline	9.90 mg/kg	ND
Acenaphthene	1.98 mg/kg	ND
2,4-Dinitrophenol	9.90 mg/kg	ND
4-Nitrophenol	9.90 mg/kg	ND
Dibenzofuran	1.98 mg/kg	ND
2,4-Dinitrotoluene	1.98 mg/kg	ND
2,6-Dinitrotoluene	1.98 mg/kg	ND
Diethylphthalate	1.98 mg/kg	ND
4-Chlorophenyl phenyl ether	1.98 mg/kg	ND
Fluorene	1.98 mg/kg	ND
4-Nitroaniline	9.90 mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90 mg/kg	ND
N-Nitrosodiphenylamine	1.98 mg/kg	ND
4-Bromophenyl phenyl ether	1.98 mg/kg	ND
Hexachlorobenzene	1.98 mg/kg	ND
Pentachlorophenol	9.90 mg/kg	ND
Phenanthrene	1.98 mg/kg	ND
Anthracene	1.98 mg/kg	ND
Di-n-butylphthalate	1.98 mg/kg	ND
Fluoranthene	1.98 mg/kg	ND
Pyrene	1.98 mg/kg	ND
Butyl benzyl phthalate	1.98 mg/kg	ND
3,3'-Dichlorobenzidine	3.90 mg/kg	ND
Benzo(a)anthracene	1.98 mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Georemediation
Laboratory Number: 33359-1
June 26, 1989
Page three

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Chrysene	1.98 mg/kg	ND
Di-n-octyl phthalate	1.98 mg/kg	ND
Benzo(b)fluoranthene	1.98 mg/kg	ND
Benzo(k)fluoranthene	1.98 mg/kg	ND
Benzo(a)pyrene	1.98 mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98 mg/kg	ND
Dibenz(a,h)anthracene	1.98 mg/kg	ND
Benzo(g,h,i)perylene	1.98 mg/kg	ND

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** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Greg W. Everett
Project Manager

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Georemediation
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE E-2,3'

LABORATORY NO. 33359-2

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Phenol	1.98 mg/kg	ND
bis(2-Chloroethyl) ether	1.98 mg/kg	ND
2-Chlorophenol	1.98 mg/kg	ND
1,3-Dichlorobenzene	1.98 mg/kg	ND
1,4-Dichlorobenzene	1.98 mg/kg	ND
Benzyl Alcohol	3.90 mg/kg	ND
1,2-Dichlorobenzene	1.98 mg/kg	ND
2-Methylphenol	1.98 mg/kg	ND
bis(2-Chloroisopropyl) ether	1.98 mg/kg	ND
4-Methylphenol	1.98 mg/kg	ND
N-Nitroso-Di-N-propylamine	1.98 mg/kg	ND
Hexachloroethane	1.98 mg/kg	ND
Nitrobenzene	1.98 mg/kg	ND
Isophorone	1.98 mg/kg	ND
2-Nitrophenol	1.98 mg/kg	ND
2,4-Dimethylphenol	1.98 mg/kg	ND
Benzoic Acid	9.90 mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98 mg/kg	ND
2,4-Dichlorophenol	1.98 mg/kg	ND
1,2,4-Trichlorobenzene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

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Georemediation
Laboratory Number: 33359-2
June 26, 1989
Page two

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Naphthalene	1.98 mg/kg	ND
4-Chloroaniline	3.90 mg/kg	ND
Hexachlorobutadiene	1.98 mg/kg	ND
4-Chloro-3-methylphenol	3.90 mg/kg	ND
2-Methylnaphthalene	1.98 mg/kg	ND
Hexachlorocyclopentadiene	1.98 mg/kg	ND
2,4,6-Trichlorophenol	1.98 mg/kg	ND
2,4,5-Trichlorophenol	1.98 mg/kg	ND
2-Chloronaphthalene	1.98 mg/kg	ND
2-Nitroaniline	9.90 mg/kg	ND
Dimethyl phthalate	1.98 mg/kg	ND
Acenaphthylene	1.98 mg/kg	ND
3-Nitroaniline	9.90 mg/kg	ND
Acenaphthene	1.98 mg/kg	ND
2,4-Dinitrophenol	9.90 mg/kg	ND
4-Nitrophenol	9.90 mg/kg	ND
Dibenzofuran	1.98 mg/kg	ND
2,4-Dinitrotoluene	1.98 mg/kg	ND
2,6-Dinitrotoluene	1.98 mg/kg	ND
Diethylphthalate	1.98 mg/kg	ND
4-Chlorophenyl phenyl ether	1.98 mg/kg	ND
Fluorene	1.98 mg/kg	ND
4-Nitroaniline	9.90 mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90 mg/kg	ND
N-Nitrosodiphenylamine	1.98 mg/kg	ND
4-Bromophenyl phenyl ether	1.98 mg/kg	ND
Hexachlorobenzene	1.98 mg/kg	ND
Pentachlorophenol	9.90 mg/kg	ND
Phenanthrene	1.98 mg/kg	ND
Anthracene	1.98 mg/kg	ND
Di-n-butylphthalate	1.98 mg/kg	ND
Fluoranthene	1.98 mg/kg	ND
Pyrene	1.98 mg/kg	ND
Butyl benzyl phthalate	1.98 mg/kg	ND
3,3'-Dichlorobenzidine	3.90 mg/kg	ND
Benzo(a)anthracene	1.98 mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Chrysene	1.98 mg/kg	ND
Di-n-octyl phthalate	1.98 mg/kg	ND
Benzo(b)fluoranthene	1.98 mg/kg	ND
Benzo(k)fluoranthene	1.98 mg/kg	ND
Benzo(a)pyrene	1.98 mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98 mg/kg	ND
Dibenz(a,h)anthracene	1.98 mg/kg	ND
Benzo(g,h,i)perylene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett

Greg W. Everett
Project Manager

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
AREA CODE 213 • 225-1564
CABLE: TRUELABS

CLIENT Georemediation
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE E-5,2'

LABORATORY NO. 33359-5

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Phenol	1.98 mg/kg	ND
bis(2-Chloroethyl) ether	1.98 mg/kg	ND
2-Chlorophenol	1.98 mg/kg	ND
1,3-Dichlorobenzene	1.98 mg/kg	ND
1,4-Dichlorobenzene	1.98 mg/kg	ND
Benzyl Alcohol	3.90 mg/kg	ND
1,2-Dichlorobenzene	1.98 mg/kg	ND
2-Methylphenol	1.98 mg/kg	ND
bis(2-Chloroisopropyl) ether	1.98 mg/kg	ND
4-Methylphenol	1.98 mg/kg	ND
N-Nitroso-Di-N-propylamine	1.98 mg/kg	ND
Hexachloroethane	1.98 mg/kg	ND
Nitrobenzene	1.98 mg/kg	ND
Isophorone	1.98 mg/kg	ND
2-Nitrophenol	1.98 mg/kg	ND
2,4-Dimethylphenol	1.98 mg/kg	ND
Benzoic Acid	9.90 mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98 mg/kg	ND
2,4-Dichlorophenol	1.98 mg/kg	ND
1,2,4-Trichlorobenzene	1.98 mg/kg	ND

* Detection limits may vary with the type of sample and with the concentration of other species present.

** ND = Not detected, below detection limit.

301 000133

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Georemediation
Laboratory Number: 33359-5
June 26, 1989
Page two

Constituent	Approximate Detection Limit*		Concentration** Micrograms/Kilogram
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

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** ND = Not detected, below detection limit.

Georemediation
Laboratory Number: 33359-5
June 26, 1989
Page three

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Chrysene	1.98 mg/kg	ND
Di-n-octyl phthalate	1.98 mg/kg	ND
Benzo(b)fluoranthene	1.98 mg/kg	ND
Benzo(k)fluoranthene	1.98 mg/kg	ND
Benzo(a)pyrene	1.98 mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98 mg/kg	ND
Dibenz(a,h)anthracene	1.98 mg/kg	ND
Benzo(g,h,i)perylene	1.98 mg/kg	ND

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Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Gregory W. Everett

Greg W. Everett
Project Manager

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6239
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CABLE: TRUELABS

CLIENT Georemediation
14 Hughes, Suite B101
Irvine, CA 92718
Attention: Gary Carlin

DATE June 26, 1989

RECEIVED June 21, 1989

SAMPLE E-4,4'

LABORATORY NO. 33359-

INVESTIGATION

Base Neutral Acid Extractables by GC/MS (EPA 8270)

RESULTS

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Phenol	1.98 mg/kg	ND
bis(2-Chloroethyl) ether	1.98 mg/kg	ND
2-Chlorophenol	1.98 mg/kg	ND
1,3-Dichlorobenzene	1.98 mg/kg	ND
1,4-Dichlorobenzene	1.98 mg/kg	ND
Benzyl Alcohol	3.90 mg/kg	ND
1,2-Dichlorobenzene	3.90 mg/kg	ND
2-Methylphenol	3.90 mg/kg	ND
bis(2-Chloroisopropyl) ether	3.90 mg/kg	ND
4-Methylphenol	3.90 mg/kg	ND
N-Nitroso-Di-N-propylamine	3.90 mg/kg	ND
Hexachloroethane	3.90 mg/kg	ND
Nitrobenzene	3.90 mg/kg	ND
Isophorone	3.90 mg/kg	ND
2-Nitrophenol	3.90 mg/kg	ND
2,4-Dimethylphenol	3.90 mg/kg	ND
Benzoic Acid	9.90 mg/kg	ND
bis(2-Chloroethyoxy)methane	1.98 mg/kg	ND
2,4-Dichlorophenol	1.98 mg/kg	ND
1,2,4-Trichlorobenzene	1.98 mg/kg	ND

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Georemediation
Laboratory Number: 33359-6
June 26, 1989

Constituent	Approximate Detection Limit*		Concentration** Micrograms/Kilogram
Naphthalene	1.98	mg/kg	ND
4-Chloroaniline	3.90	mg/kg	ND
Hexachlorobutadiene	1.98	mg/kg	ND
4-Chloro-3-methylphenol	3.90	mg/kg	ND
2-Methylnaphthalene	1.98	mg/kg	ND
Hexachlorocyclopentadiene	1.98	mg/kg	ND
2,4,6-Trichlorophenol	1.98	mg/kg	ND
2,4,5-Trichlorophenol	1.98	mg/kg	ND
2-Chloronaphthalene	1.98	mg/kg	ND
2-Nitroaniline	9.90	mg/kg	ND
Dimethyl phthalate	1.98	mg/kg	ND
Acenaphthylene	1.98	mg/kg	ND
3-Nitroaniline	9.90	mg/kg	ND
Acenaphthene	1.98	mg/kg	ND
2,4-Dinitrophenol	9.90	mg/kg	ND
4-Nitrophenol	9.90	mg/kg	ND
Dibenzofuran	1.98	mg/kg	ND
2,4-Dinitrotoluene	1.98	mg/kg	ND
2,6-Dinitrotoluene	1.98	mg/kg	ND
Diethylphthalate	1.98	mg/kg	ND
4-Chlorophenyl phenyl ether	1.98	mg/kg	ND
Fluorene	1.98	mg/kg	ND
4-Nitroaniline	9.90	mg/kg	ND
4,6-Dinitro-2-methylphenol	9.90	mg/kg	ND
N-Nitrosodiphenylamine	1.98	mg/kg	ND
4-Bromophenyl phenyl ether	1.98	mg/kg	ND
Hexachlorobenzene	1.98	mg/kg	ND
Pentachlorophenol	9.90	mg/kg	ND
Phenanthrene	1.98	mg/kg	ND
Anthracene	1.98	mg/kg	ND
Di-n-butylphthalate	1.98	mg/kg	ND
Fluoranthene	1.98	mg/kg	ND
Pyrene	1.98	mg/kg	ND
Butyl benzyl phthalate	1.98	mg/kg	ND
3,3'-Dichlorobenzidine	3.90	mg/kg	ND
Benzo(a)anthracene	1.98	mg/kg	ND
bis(2-ethylhexyl)phthalate	1.98	mg/kg	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND = Not detected, below detection limit.

Georemediation
Laboratory Number: 33359-5
June 26, 1989
Page three

Constituent	Approximate Detection Limit*	Concentration** Micrograms/Kilogram
Chrysene	1.98 mg/kg	ND
Di-n-octyl phthalate	1.98 mg/kg	ND
Benzo(b)fluoranthene	1.98 mg/kg	ND
Benzo(k)fluoranthene	1.98 mg/kg	ND
Benzo(a)pyrene	1.98 mg/kg	ND
Indeno(1,2,3-cd)pyrene	1.98 mg/kg	ND
Dibenz(a,h)anthracene	1.98 mg/kg	ND
Benzo(g,h,i)perylene	1.98 mg/kg	ND

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** ND = Not detected, below detection limit.

Respectfully submitted,
TRUESDAIL LABORATORIES, INC.

Greg W. Everett
Project Manager

Coca-Cola Enterprises Inc.
1334 South Central Avenue
Los Angeles, CA 90021
213 746-5555

Coca-Cola Enterprises
A Bottling System

FACSIMILE COVER SHEET

FACSIMILE MACHINE: (213)745-6141

DATE: 3/15/89 **TIME:** 10:15 AM

PLEASE DELIVER THE FOLLOWING 6 **PAGES(S) TO:**

NAME: GARY CARLIN

FACSIMILE NUMBER: (714) 830-8239

FROM: RAUL RAMIREZ

COMMENTS: FOR YOUR REVIEW. PLEASE ADVISE AS THE TOTAL COST ON THE

Cal Tank Testing

3296 S. Mooney Blvd.
Visalia, CA 93277
(209) 625-9911

#1

March 9, 1989

RECEIVED
MAR 13 1989
FACILITIES

Raul Ramirez
Coca Cola Enterprises
P.O. Box 21931
Los Angeles, California 90021

Re: Site clean up at 19875 Pacific Gateway Facility
in Torrance, California.

Mr. Ramirez:

As per your request I personally conducted a site walk at the above mentioned future Coca Cola Facility, and reviewed the copy of the sub surface investigation report that you provided for me. I feel I have a good understanding of Coca Cola's needs at this site, and can provide the needed services in a speedy fashion upon your approval of the proposed costing for services listed below.

Services and related costing for clean up and disposal of contaminated soils, and backfill, compaction and resurfacing excavation area with asphalt. Based on 500 yds. of contaminated soils that is to be disposed of.

A.

1. Permitting
2. Necessary equipment for break out and disposal of existing asphalt and concrete from the area of concern (if the asphalt is not contaminated and/or considered hazardous waste).
3. Equipment for excavation of the contaminated soils and loading of hazardous waste transportation trucks, (includes one cat crawler with ripper and a four in one clam bucket, 966 front end loader).
4. Tripple rinse and removal of concrete vault.
5. Mobil laboratory on site, up to 30 samples for analysis 4 hr. turn around.
6. Registered Geologist to take samples for analysis in mobil laboratory, estimated for 4 days.
7. Photovac for 4 days to screen samples.
8. Backfill material and compaction.
9. Project manager- five days field work.
10. Report on site clean-up by Registered Geologist.

Sub Total ---------- $ 126,000.00

301 000140

B. Disposal fees and transportation of contaminated soils, based on 500 (five hundred) cubic yards.

1. Disposal fees, 7% County tax, transportation based on cubic yard price - $ 227.00 per cubic yard, $ 237.00 per cubic yard x 500 cubic yard is ---------- $ 118,500.00

Sub Total ---------- $ 118,500.00

c. Resurfacing of area with asphalt ---------- $ 8,000.00

Sub Total ---------- $ 8,000.00

Total of Sub Totals ---------- $ 252,500.00

Note:

For any additional cubic yards of soils to be excavated time and materials will apply. Disposal fee's will remain at the figure of $ 237.00 per cubic yard.

Mr. Ramirez:

Cal Tank Testing & Construction can and will start permitting procedures on this project upon receipt of your authorization and purchase order

If you have any questions please call me at 1-800-233-0859.

P.S. Enclosed you will find a few pictures I took for you.

Thank you
Truly yours,

Doc Quinn

Doc Quinn
C.T.T.C.
Director of Services

c.c. Mr. Ed Todd

Dc/dkq

301 000141

#2

total Cost

	500	750	1000
Excavate	5072	8064	10,480
transport/Disposal	68775	103162	137,549
Backfill	6357	12907	17215
Remove closing	T/M	T/M	T/M
Shoring	T/M	T/M	T/M
Lab	800	800	800
Break asphalt	7600	7600	7600
	88,606	132,533	173,644

301 000142

1022 Eubank Avenue • Wilmington, California 90744
(213) 518-0900 • (213) 518-0526 • (213) 775-3309

Mr. Raul Ramirez
Manager, Facilities Department
Coca-Cola Los Angeles
1334 South Central Avenue
Los Angeles, California 90021

Dear Mr. Ramirez,

Ancon Environmental Services (Ancon) is pleased to submit the following information to provide all necessary manpower, equipment and labor to accomplish the following Scopes of Work:

Scope of Work Number 1

-Break and remove four (4) inch asphalt as indicated in site map provided.
Estimated Cost.....$ 7,600.00

Scope of Work Number 2

-Excavate, remove and load transporting vehicle with contaminated soil in the following quantities:

Estimated cost 500 cubic yards.....$ 5,072.00
Estimated cost 750 cubic yards.....$ 8,064.00
Estimated cost 1000 cubic yards.....$ 10,480.00

Scope of Work Number 3

-Transport and dispose of contaminated soil in the following quantities:

137 50 PD W/IN 15 DAYS TRANSPORT TO PINI, PETROLEUM WASTE INC.

Estimated cost 500 cubic yards.....$ 68,774.20
Estimated cost 750 cubic yards.....$103,161.30
Estimated cost 1000 cubic yards.....$137,548.40

Please note: Additional laboratory analysis is required by disposal sites prior to acceptance.
Approximate Cost.....$ [illegible]0.00

Scope of Work Number 4

-Expose, clean a required, remove and dispose of tank/clarifier.

* To be performed on a time and material basis according to our published rate sheet. (See attached.)

Scope of Work Number 5

-Backfill and compact (95 percent) to subgrade in the following quantities:

Estimated cost 500 cubic yards.....$ 6,359.00
Estimated cost 750 cubic yards.....$12,907.00
Estimated cost 1000 cubic yards.....$17,215.00
MATERIAL INCL.?

Scope of Work Number 6

-Shoring (if required and if permitted by regulatory agencies involved) for structural support during excavation under or near the existing building.

* To be performed on a time and material basis according to our published rate sheet. (See attached.)

Thank you for the opportunity to bid on this work. If you have any questions or require further information, please feel free to contact us.

Sincerely,
Ancon Environmental Services

Dale Strieter

Dale Strieter
Manager of Technical Services

N. Allen
Hazardous Waste Specialist

1 7,600.
2 5,072
3 68,704.20
5 6,359.00
4 5
85,105.20

301 000144

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

FACSIMILE TRANSMISSION SHEET

DATE: 4/6/89

TO: Arcon – Dale

FROM: Gary Carlin

SUBJECT: Laboratory Results – ECIU Analyses

NUMBER OF PAGES TO FOLLOW: 2

CALL IF YOU DO NOT RECEIVE ALL OF THIS TRANSMISSION

301 000145

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

REPORT

TRUESDAIL LABORATORIES, INC.

CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FF [illegible] AVENUE
TUSTIN, CALIFORNIA 926[illegible]
AREA CODE 714 [illegible] 730 [illegible]
AREA CODE 213 [illegible] 64
CABLE: [illegible]

CLIENT: **GEOREMEDIATION**
14 Hughes Street, Suite B101
Irvine, CA 92718

DATE: April 6, 1989

RECEIVED: March 24, 1989

SAMPLE: **Soil S-1, Project: Stoney Miller Coca-Cola, Torrance**

LABORATORY NO. 32344

INVESTIGATION

PURGEABLE ORGANICS (Volatiles) by EPA 8010 GC-HECD

RESULTS

Constituent	Detection Limit* ug/kg	Concentration** ug/kg
Bromodichloromethane	5.0	ND
Bromoform	5.0	ND
Carbon Tetrachloride	5.0	ND
Chlorobenzene	5.0	ND
Chloroform	5.0	ND
bis (2-Chloroethyl) ether	5.0	ND
Dibromochloromethane	5.0	ND
1,2-Dichlorobenzene	5.0	ND
1,3-Dichlorobenzene	5.0	ND
1,4-Dichlorobenzene	5.0	ND
Dichlorodifluoromethane	5.0	ND
1,1-Dichloroethane	5.0	ND
1,2-Dichloroethane	5.0	ND
1,1-Dichloroethene	5.0	ND
trans-1,2-Dichloroethene	5.0	ND
1,2-Dichloropropane	5.0	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.
** ND: Not detected, below the detection limit.

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently ident or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclu use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any advertising or publicity m without prior written authorization from these Laboratories.

Constituent	Detection Limit* ug/kg	Concentration** ug/kg
cis-1,3-Dichloropropene	5.0	ND
trans-1,3-Dichloropropene	5.0	ND
Methylene Chloride	5.0	ND
1,1,2,2-Tetrachloroethane	5.0	ND
Tetrachloroethene	5.0	ND
1,1,1-Trichloroethane	5.0	ND
1,1,2-Trichloroethane	5.0	ND
Trichloroethene	5.0	ND
Trichlorofluoromethane	5.0	ND

* Detection limits may vary with the type of sample and with the concentrations of other species present.

** ND: Not detected, below the detection limit.

Respectfully submitted,

TRUESDAIL LABORATORIES, INC.

Gregory W. Everett

Gregory W. Everett, Project Manager
Water and Waste Laboratory

CADIZ & CADIZ, ARCHITECTS
6381 Hollywood Blvd., #5C
LOS ANGELES, CALIFORNIA 90028

(213) 461-0932

LETTER OF TRANSMITTAL

DATE 6-12-89	JOB NO.
ATTENTION MR. GARY CARLIN	
RE: COCA-COLA CARSON FAC.	

TO SIDNEY-MILLER CONSULTANT
14 HUGHES, SUITE B-101
IRVINE, CA 92718

WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via _____ the following items:

☐ Shop drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications
☐ Copy of letter ☐ Change order ☒ MYLAR

COPIES	DATE	NO.	DESCRIPTION
1		C3	SITE GRADING / DRAINAGE PLAN

THESE ARE TRANSMITTED as checked below:

☐ For approval ☐ Approved as submitted ☐ Resubmit _____ copies for approval
☒ For your use ☐ Approved as noted ☐ Submit _____ copies for distribution
☐ As requested ☐ Returned for corrections ☐ Return _____ corrected prints
☐ For review and comment ☐ _____
☐ FOR BIDS DUE _____ 19 _____ ☐ PRINTS RETURNED AFTER LOAN TO US

REMARKS PER MR. RAUL RAMIREZ REQUEST.

To confirm our telephone conversation today to the best of your knowledge, you feel that we will not need a AQMD permit for the new Distribution center we are building.

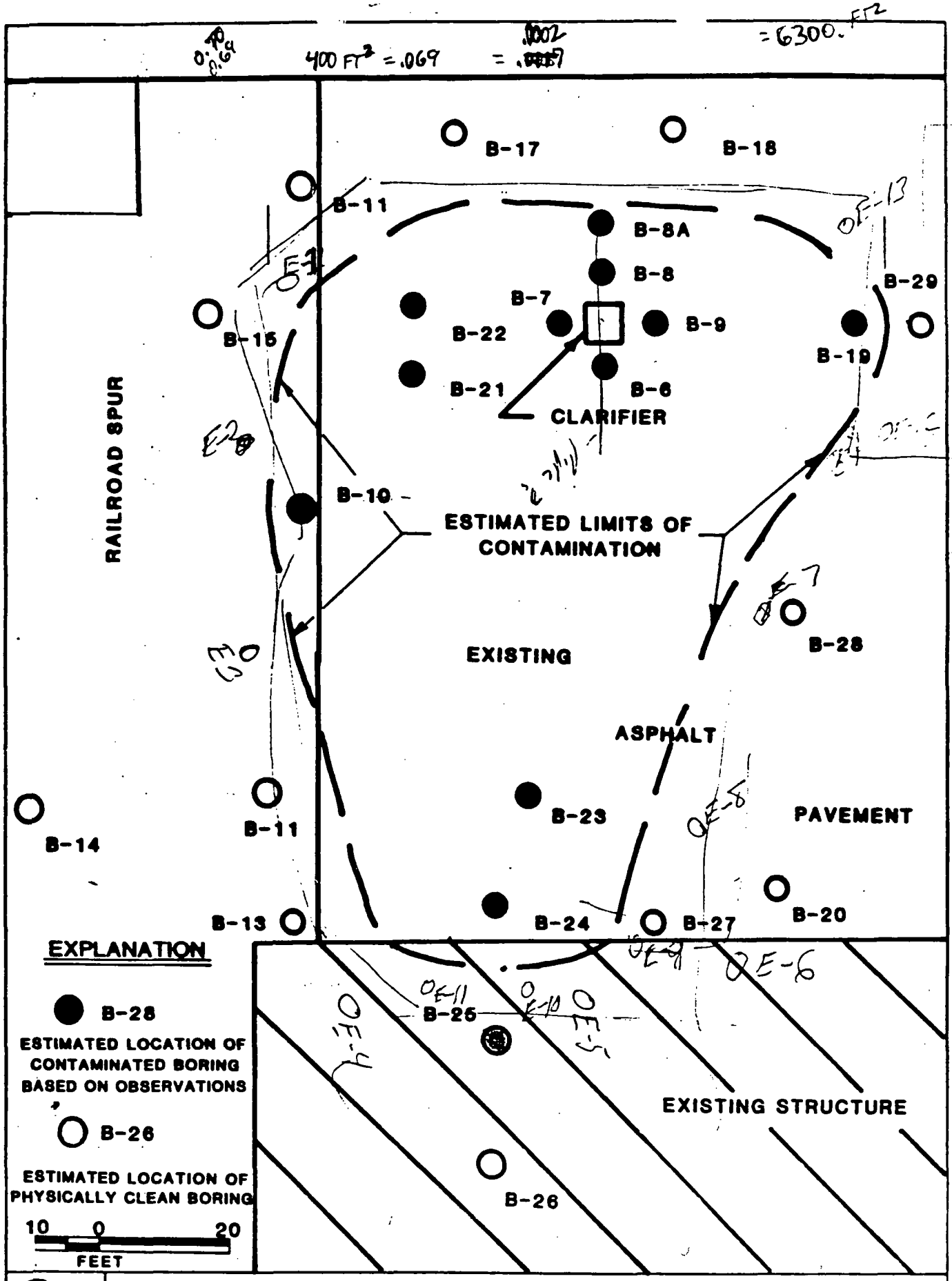
COPY TO R. Ramirez

SIGNED: Carlos

301 000148

NUCT 240-3 NEBS Inc., Groton, Mass. 01471.

If enclosures are not as noted, kindly notify us at once.



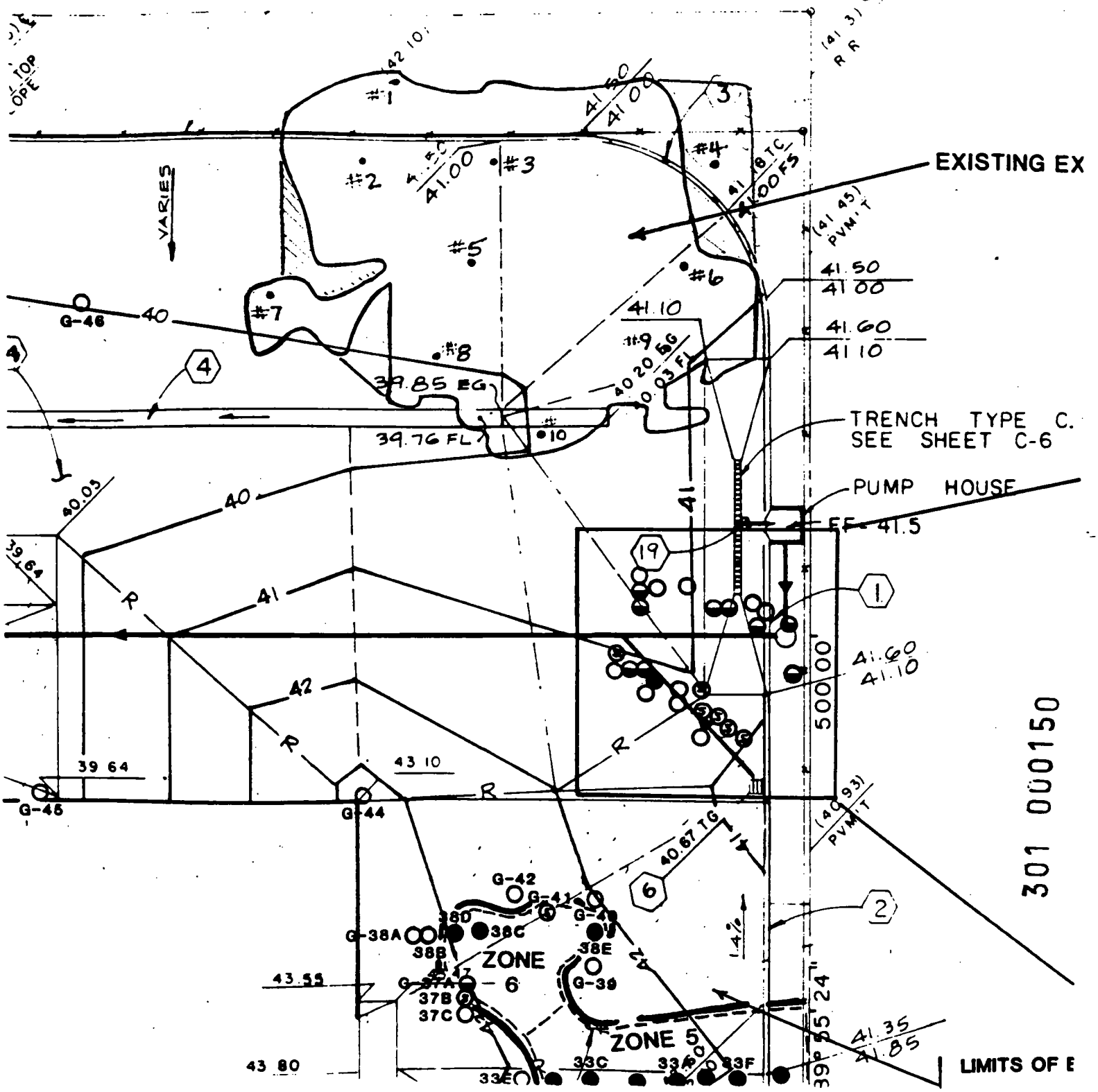
LIMITS OF CONTAMINATION

JOB NO.:	DATE:	FIGURE:
10221-00	NOVEMBER, 1988	

Coca-Cola, Torrance
PIT SAMPLES ("C.C.P.")

2-0 GRAVEL EDGE.
SEE DETAIL SHEET C-5

7-14-89 1" = 40'



Coca-Cola Torrance Facility

Problem: 2900 to 5000 cubic yards of contaminated soil beneath the site. Contaminants are relatively non-volatile naphthalenes. Some concentrations are over the 1000 ppm concentration criteria for determining hazardous waste characteristics. Site has been razed and construction is ready to start.

Options:

1). No action – leave contamination in place and build facility. Regulators do not appear to be concerned about the contamination and it does not appear to be a threat to groundwater (DTW @ ~100 feet).

Advantages: ① no additional expenses or delays during construction

Disadvantages: ① any future transactions involving this site may be complicated by the contamination issue (site is public information).

② since some concentrations exceed hazardous waste levels State regulators may eventually develope an "interest" in this site or apply more stringent regulations

301 000151

in the future.

③ Once the facility is built, remediation will be virtually impossible.

2). Excavate and Dispose - excavate contaminated soil and dispose at an authorized landfill. If concentrations are over 1000ppm, this must be a Class I Landfill. Soil with concentrations below 1000 ppm may be disposed at a Class III facility with prior approval.

Advantages: excavation and removal will leave the site free and clear of the identified contaminants. Future property transactions or regulator intervention should not be a problem.

Disadvantages: ① Excavation and proper disposal is expensive. Disposal costs alone run $250 - 300.00 per cubic yard. Based on the estimated volume used, these costs will conservatively range from 870,000 to 1,500,000 at a Class I facility. Disposal at a Class III facility will be considerably cheaper; probably $145,000 to 250,000.00. These prices do not include excavation, transportation, documentation, or [illegible] sampling or imported fill.

301 000152

(2) Placing material in a Class I landfill does not alleviate Coca-Cola's ownership of the material. Coca-Cola will maintain all ownership and liability and may potentially (very high potential) be required to participate in cleanup of the landfill at some point in time.

Disposal of material at a Class III facility (BKK Landfill was mentioned) may increase both liability and visibility. These landfills are typically not constructed to contain anything except household wastes. According to the California Department of Health, BKK was formerly a Class I facility which was closed in 1984. It was re-opened as a Class III facility in 1985 and has had numerous compliance violations. In addition, a residential area is reportedly located very near the facility. This neighborhood was evacuated in 1986 because of methane leaks from BKK.

(3) Construction will be delayed about 2 weeks. This time will be necessary to excavate, remove, and dispose of soil. In addition, confirmation sampling and chemical analysis should be performed.

3). Excavate and On-Site Treatment: excavate contaminated soils and treat on-site to reduce contaminant concentrations to acceptable levels. Once constructed, treatment cell will not affect construction or operation of plant

advantages: ① end result of treatment will leave site free and clear of identified contaminants. Future property transactions or regulatory involvement should not present a problem.

② On-site treatment eliminates the secondary liability associated with disposal at landfills.

③ On-site treatment is much less expensive than disposal at Class I landfill. Ballpark estimate for on-site treatment is $500,000.00 compared to 270,000 to 1.5 million for disposal.

Disadvantages: ① Construction may be delayed up to six weeks to allow for system design and permitting (if required). Two weeks estimated for construction of treatment cell and placement of soil.

SUMMARY OF REMAINING CONTAMINATED SOIL

AREA			CU YDS
1	CONTAMINATED		600
	OVERBURDEN		800
2	CONTAMINATED		300
	OVERBURDEN		304
3	CONTAMINATED		12
	OVERBURDEN		12
4 4 5 6	CONTAMINATED	4 { 610.8	~~2210~~ ? - 1219
	OVERBURDEN	0	0
7 ~~5~~	CONTAMINATED	5 { 505.9	860
	OVERBURDEN	0	0
		6 { 102.1	
TOTAL		0	
	CONTAMINATED		-3982 $\boxed{2791}$
	OVERBURDEN	7 {860	~~1160~~ 1116
		0	
UNDER OLD BUILDING			
	CONTAMINATED		900
	OVERBURDEN		1100

recommend

break into 3 zones (no overburden)
(ignore the 1' area on map)
two 2' deep
one 5' deep

total contaminated soil to remove 1218.8 cu. yds. from old Zone 4

7

301 000155

× 2461.5 =

2' A : 0.56 = 1378.4 × 2 = 2756.8 ÷ 27 = 102.1

2' B : 3.35 = 8246.0 × 2 = 16492.0 ÷ 27 = 610.8

5' = 1.11 = 2732.3 × 5 = 13661.5 ÷ 27 = 505.9

1' = 1.46 = 3593.8 × 1 = 3593.8 ÷ 27 = 133.1

ATTN: Neil Allen

Have yet to Recieve
TOX Data for Coca Cola.
Will get them to you
As soon As Possible.

Ed Cieslak

30 May 89

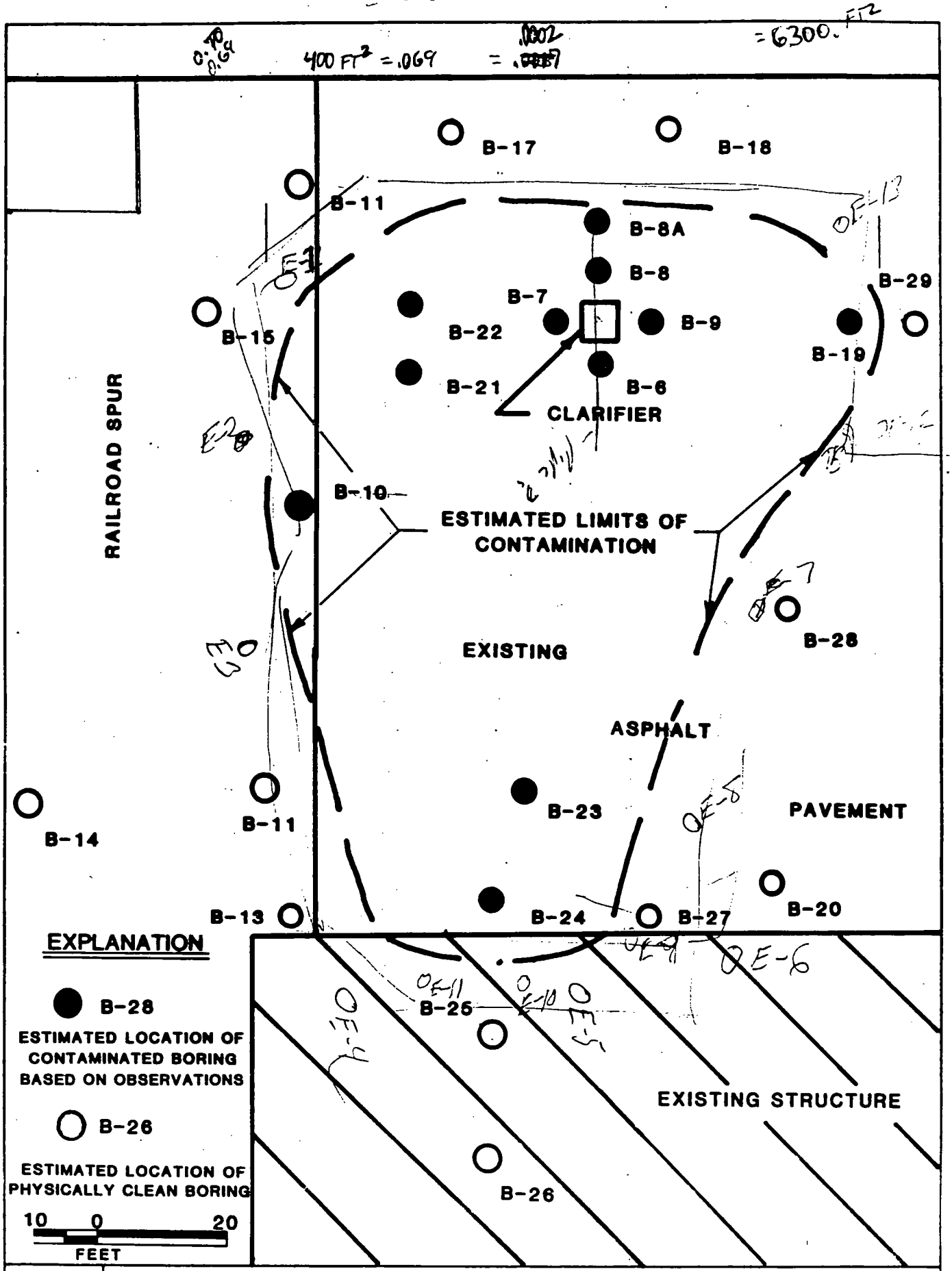
E-1
slight 1½ ft
2' moderate to heavy
4' Heavy
5' Clean
removed earlier

E-2 Clean to 4'
E-3 Clean to 6'

E-4 clean to 6'
E-5 impenetrable rubble 2', clean
E-6 clean to 5'

E-7 clean to 5'
E-8 rubble & debris to 2 ft clean to 5 ft
E-9 rubble + debris to 2 ft then silty clay clean to 5 ft
E-10 clean to 5 ft
E-11 clean to 5 ft
E-12 1 ft thin previously excavated material heavy odor
@ 3½ ft light brown clayey sand, moist, no odor
E-13 @ 2 ft light brown clayey sand, no odor

301 000166



SMC	LIMITS OF CONTAMINATION		
	JOB NO.: 10221-00	DATE: NOVEMBER, 1988	FIGURE:

301 000167

CCE-West
1334 South Central Avenue
Los Angeles, CA 90021
213 746-5555

LETTER OF TRANSMITTAL

CCE-West

DATE	September 15, 1989
ATTENTION	Gary Carlin
SUBJECT	CARSON

TO

General Remediation

17141 Murphy, Suite D

Irvine, CA 92714

GENTLEMEN:

WE ARE SENDING YOU [X] Attached [ ] Under separate cover via _____
the following items:

[ ] Shop Drawings [ ] Prints [X] Plans [ ] Samples [ ] Specifications

[ ] Copy of Letter [ ] Change Order _____

COPIES	DATE	NO.	DESCRIPTION

THESE ARE TRANSMITTED as checked below:

[ ] For Approval [ ] Approved as submitted [ ] Resubmit___ copies for approval

[X] For your use [ ] Approved as noted [ ] Submit___ copies for distribution

[ ] As requested [ ] Returned for corrections [ ] Return___ corrected prints

[ ] For review and comment

[ ] FOR BIDS DUE _____ 19___.

REMARKS Please correct the plan showing the excavated area. We need this done immediately.

Raul Ramirez

301 000168

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

CHAIN OF CUSTODY RECORD

DATE COLLECTED: 3/24/89 PROJECT: Coca Cola

SAMPLED BY: CJC PROJECT LOCATION: Torrance

SAMPLE S-1

LOCATION	DATE	DESCRIPTION	ANALYSIS
S-1	3/24/89	GLASS JAR	TPH 8015 Modified
			Flash Point 1010
			Ph 9040
			Sulfide 930
			Cyanide 910
			PCB 8080
			Total organic Halides (TOX) 9020
			Title 22 metals

SAMPLE TRANSFER

1	RELINQUISHED BY: [signature]	DATE: 24 Mar 89	
	RECEIVED BY: [signature]	DATE: 24 March 89	
2	RELINQUISHED BY:	DATE:	
	RECEIVED BY:	DATE:	
3	RELINQUISHED BY:	DATE:	
	RECEIVED BY:	DATE:	
4	RELINQUISHED BY:	DATE:	
	RECEIVED BY:	DATE:	

301 000169

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

TRUESDAIL LABORATORIES, INC.

CHAIN-OF-CUSTODY RECORD

DATE _____ PAGE ___ OF ___

PROJECT NAME: COCA COLA – TORRANCE
REFERENCE: STONEY-MILLER CONSULTANTS
ADDRESS: 14 HUGHES, SUITE D-101, IRVINE, CA 92718
SAMPLERS (SIGNATURE): [signature]

SAMPLE NO.	DATE	TIME	LOCATION	8240	418.1									NUMBER OF CONTAINERS	COMMENTS/ CONTAINER TYPE
NEAR G-3	6/5/89	2:25	~~SOUTH~~ ~~WEST~~ EAST CORNER OF SITE	X	X									1	6" RING

301 0001170

1 RELINQUISHED BY	DATE	3 RELINQUISHED BY	DATE	5 RELINQUISHED BY	DATE
SIGNATURE: [signature]	6/5/89	SIGNATURE		SIGNATURE	
PRINTED NAME: [signature]	TIME	PRINTED NAME	TIME	PRINTED NAME	TIME
COMPANY: STONEY MILLER CONSULTANTS		COMPANY		COMPANY	

2 RECEIVED BY	DATE	4 RECEIVED BY	DATE	6 RECEIVED BY (LAB)	DATE
SIGNATURE		SIGNATURE		SIGNATURE: V. NAVASARTIAN	6/5/89
PRINTED NAME	TIME	PRINTED NAME	TIME	PRINTED NAME: TRUESDAIL LABS/INC.	TIME 1800
COMPANY		COMPANY		COMPANY	

TOTAL NUMBER OF CONTAINERS

SAMPLE CONDITIONS

RECEIVED ON ICE YES / NO

SEALED YES / NO

SPECIAL SHIPMENT/HANDLING OR STORAGE REQUIREMENTS:

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

fill to

CHAIN OF CUSTODY RECORD

DATE COLLECTED: 9/30/88 PROJECT: CoCA Cola - Torrance

SAMPLED BY: JA + GTC PROJECT LOCATION: Torrance

SAMPLE

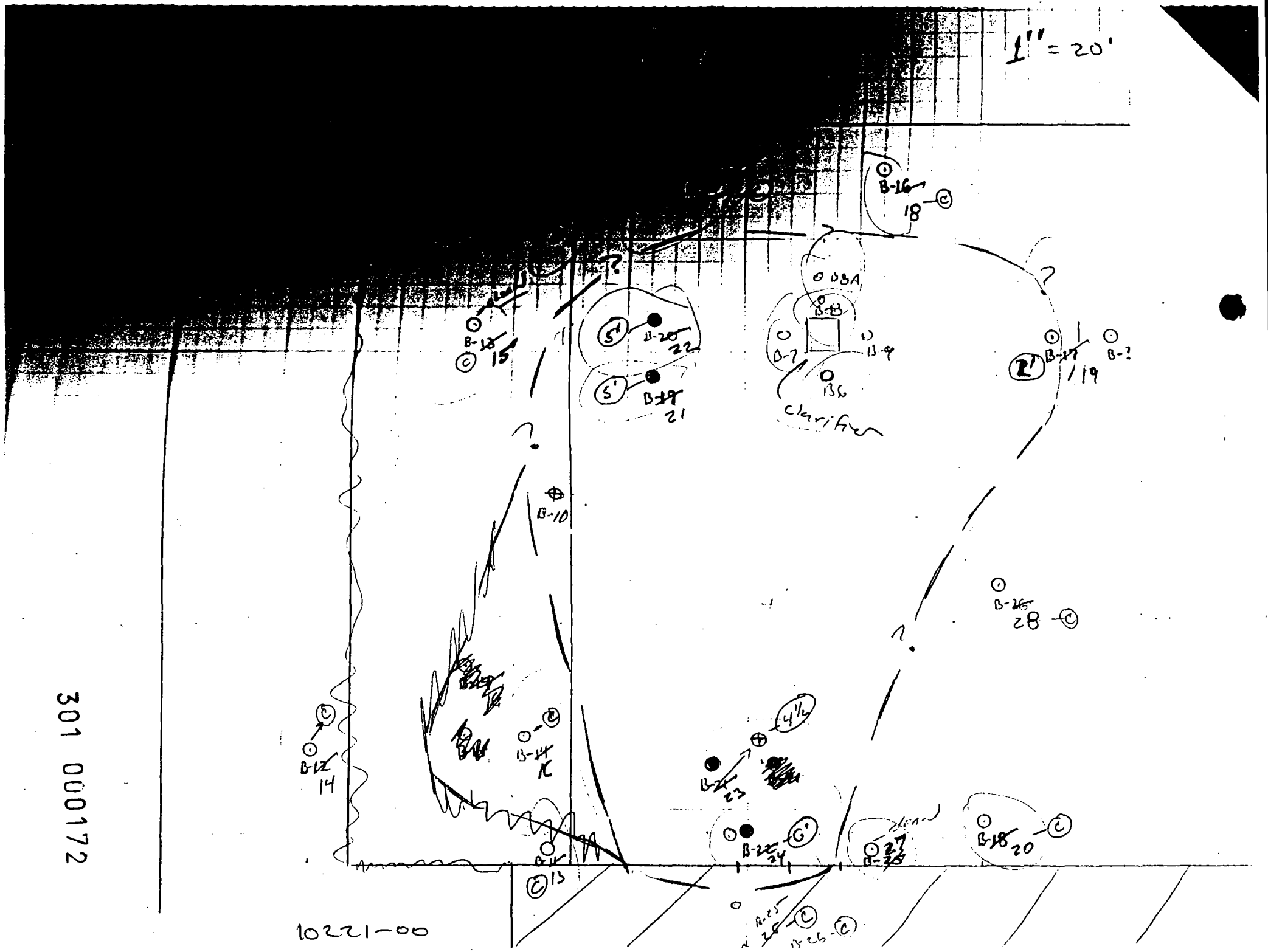
LOCATION	DATE	DESCRIPTION	ANALYSIS
R-3-1'	9/30/88	6" of 1" Brass rings w/ soil in rings	4/B.1

SAMPLE TRANSFER

1	RELINQUISHED BY:	[illegible]	DATE:	10/5/88
	RECEIVED BY:	Ben Anderson	DATE:	10-5-88
2	RELINQUISHED BY:		DATE:	
	RECEIVED BY:		DATE:	
3	RELINQUISHED BY:		DATE:	
	RECEIVED BY:		DATE:	
4	RELINQUISHED BY:		DATE:	
	RECEIVED BY:		DATE:	

301 000171

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886


1" = 20'
B-16
18
B-13
15
B-20
22
B-19
21
B-8A
B-8
B-7
B-9
B6
clarifier
B-17
19
B-10
B-26
28
B-12
14
B-14
K
B-21
23
B-22
24
B-25
27
B-18
20
B-11
13
B-25
25
B-26
10221-00

301 000172

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

CHAIN OF CUSTODY RECORD

DATE COLLECTED: 10-11-88 PROJECT: COCA-COLA

SAMPLED BY: GARY CARLIN PROJECT LOCATION: TORRANCE

SAMPLE

LOCATION	DATE	DESCRIPTION	ANALYSIS
B-7 - 5'	10-11-88	6" RING-SOIL	418.1 & 8270
" 10'	"	"	
" 15'	"	"	Will call ← 418.1 + 8270
B-8 2½'	"	"	
8'	"	"	with instructions
15'	"	"	418.1 + 8270
B-9 2½'	"	"	~~[illegible]~~
5'	"	"	418.1 & 8270
10'	"	"	
15'	"	"	418.1 & 8270
B-10 3'	"	"	418.1 & 8270
10'	"	"	418.1 & 8270
B-11 8'	"	"	418.1 & 8270

SAMPLE TRANSFER

1	RELINQUISHED BY:	Gary J. Carlin	DATE:	10/13/88
	RECEIVED BY:		DATE:	
2	RELINQUISHED BY:		DATE:	10-13-88
	RECEIVED BY:		DATE:	
3	RELINQUISHED BY:		DATE:	
	RECEIVED BY:		DATE:	
4	RELINQUISHED BY:		DATE:	
	RECEIVED BY:		DATE:	

301 000173

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

SUMMARY OF REMAINING CONTAMINATED SOIL

ZONE		AREA(ft^2)	THICKNESS(ft)	CU YDS
1	CONTAMINATED	10,806	1.5	600
	OVERBURDEN			800
2	CONTAMINATED	4,110.7	2.0	300
	OVERBURDEN			304
3	CONTAMINATED	664.6	0.5	12
	OVERBURDEN			12
4	CONTAMINATED	8,246	2.0	611
	OVERBURDEN			0
5	CONTAMINATED	2,732.3	5.0	506
	OVERBURDEN			0
6	CONTAMINATED	1,378.4	2.0	102
	OVERBURDEN			0
7	CONTAMINATED	1,722.7	13.5	860
	OVERBURDEN			0
TOTAL				
	CONTAMINATED			2991
	OVERBURDEN			1116
UNDER OLD BUILDING				
	CONTAMINATED			900
	OVERBURDEN			1100

TRUESDAIL LABORATORIES, INC.

CHAIN-OF-CUSTODY RECORD

DATE 6-21-89 PAGE 1 OF 1

PROJECT NAME: COCA-COLA
REFERENCE: Georemediation
ADDRESS: 14 HUGHES ST
IRVINE CA 92718
SAMPLERS (SIGNATURE): W.K. Sumner

SAMPLE NO.	DATE	TIME	LOCATION	418.1 TPH		8270								NUMBER OF CONTAINERS	COMMENTS/ CONTAINER TYPE
			E-1 - 2'	X		X								1	
			E-2 - 3'	X		X								1	WORST CASE SAMPLES (WCS)
			E-3 - 3'	X										1	HOLD (WCS)
			E-4 - 4'	X		X								1	(WCS)
			E-5 - 2'	X		X								1	(WCS)
			E-3 - 5'	X		X								1	(WCS)
			F-2 - 2'											1	HOLD (WCS)

1 RELINQUISHED BY	DATE	3 RELINQUISHED BY	DATE	5 RELINQUISHED BY	DATE
SIGNATURE: W.K. Sumner		SIGNATURE:		SIGNATURE:	
PRINTED NAME: W.K. Sumner	TIME	PRINTED NAME:	TIME	PRINTED NAME:	TIME
COMPANY: LBO.		COMPANY:		COMPANY:	

2 RECEIVED BY	DATE	4 RECEIVED BY	DATE	6 RECEIVED BY (LAB)	DATE
SIGNATURE:		SIGNATURE:		SIGNATURE: [signature]	6/21/89
PRINTED NAME:	TIME	PRINTED NAME:	TIME	PRINTED NAME: Gregory W. Everett	TIME 2:17 pm
COMPANY:		COMPANY:		COMPANY: Truesdail	

7 TOTAL NUMBER OF CONTAINERS

SAMPLE CONDITIONS

RECEIVED ON ICE (YES) / NO

SEALED (YES) / NO

SPECIAL SHIPMENT/HANDLING OR STORAGE REQUIREMENTS:

301 000158

BKK LANDFILL
2210 SO. AZUSA AVENUE • WEST COVINA, CA 91791

№ 03410

NON-HAZARDOUS WASTE DATA FORM

TO BE COMPLETED BY GENERATOR

NAME COCA-COLA BOTTLING CO.
ADDRESS 19875 PACIFIC GATEWAY
EPA I.D. NO. CAD982411803
CITY, STATE, ZIP TORRANCE, CA 90502
PHONE NO. (213) 746-5555

CONTAINERS: No. _____ VOLUME 2900 Cu Yd WEIGHT _____

TYPE: ☐ TANK TRUCK ☒ DUMP TRUCK ☐ DRUMS ☐ CARTONS ☐ OTHER _____

WASTE DESCRIPTION Soil GENERATING PROCESS UNKNOWN

COMPONENTS OF WASTE	PPM	%	COMPONENTS OF WASTE	PPM	%
1. Total Petroleum Hydrocarbon	5136		5.		
2. Total Organic Halides	115		6.		
3. See Attached			7.		
4.			8.		

PROPERTIES: pH 7.8 ☒ SOLID ☐ LIQUID ☐ SLUDGE ☐ SLURRY ☐ OTHER _____

HANDLING INSTUCTIONS: _____

THE GENERATOR CERTIFIES THAT THE WASTE AS DESCRIBED IS 100% NON-HAZARDOUS.

TYPED OR PRINTED FULL NAME & SIGNATURE _____ DATE _____

TRANSPORTER

NAME _____ EPA I.D. NO. _____
ADDRESS _____ SERVICE ORDER NO. _____
CITY, STATE, ZIP _____ PICK UP DATE _____
PHONE NO. ( )
TRUCK, UNIT, I.D. NO
TYPED OR PRINTED FULL NAME & SIGNATURE _____ DATE _____

TSD FACILITY

NAME _____ EPA I.D. NO. _____
ADDRESS _____
CITY, STATE, ZIP _____
PHONE NO. ( )

DISPOSAL METHOD
☐ LANDFILL ☐ OTHER _____

TYPED OR PRINTED FULL NAME & SIGNATURE _____ DATE _____

GEN	OLD/NEW	L A	TONS
TRANS		S B	
C/Q		RT/CD	HWDF NONE

DISCREPANCY

301 000159

BKK Form 6062 8/87 White & Yellow - **TSD COPY** Pink - **GENERATOR COPY** Goldenrod - **TRANSPORTER COPY**

STONEY-MILLER CONSULTANTS, INC.

GEOTECHNICAL ENGINEERING & ENGINEERING GEOLOGY

CHAIN OF CUSTODY RECORD

DATE COLLECTED: 7-14-89 PROJECT: Coca-Cola

SAMPLED BY: FSB PROJECT LOCATION: Torrance

SAMPLE excavation pit

LOCATION	DATE	DESCRIPTION	ANALYSIS
C.C.P. #1	7-14	Soil - 6" brass ring	418.1
C.C.P #2			418.1 + 8270
C.C.P #3			418.1
C.C.P. #4			418.1 + 8270
C.C.P #5			418.1
C.C.P. #6			418.1 + 8270
C.C.P #7			418.1
C.C.P. # 8			418.1 + 8270
C.C.P. # 9			418.1
C.C.P. # 10			418.1

SAMPLE TRANSFER

1	RELINQUISHED BY: Francis E. Blake	DATE: 7-17-89	
	RECEIVED BY: [illegible]	DATE: 7-17-89	
2	RELINQUISHED BY:	DATE:	
	RECEIVED BY:	DATE:	
3	RELINQUISHED BY:	DATE:	
	RECEIVED BY:	DATE:	
4	RELINQUISHED BY:	DATE:	
	RECEIVED BY:	DATE:	

14 HUGHES, SUITE B-101 IRVINE, CA 92718 (714) 380-4886

COMPOSITE LOG OF SAMPLE COLLECTION TO CHARACTERIZE SOIL ALONG PACIFIC GATEWAY.

COCA-COLA 6-21-89

	1'	2'	3'	4'	5'
F-1	CLEAN	CLEAN	CLEAN	CLEAN	
F-2	CLEAN	odor / DARK COLOR →		CLEAN	CLEAN
F 3	CLEAN	CLEAN	CLEAN	CLEAN	CLEAN
F-4	CLEAN	CLEAN	CLEAN	CLEAN	CLEAN
E-1	ODOR	DARK COLOR ODOR	ODOR	CLEAN	
E-2	CLEAN	LIGHT ODOR	LIGHT ODOR /	GREEN COLOR / ODOR	ODOR	CLEAN
E-3	CLEAN	ODOR	ODOR / GREEN COLOR	DARK BROWN COLOR →	5' PLUS
E-4	CLEAN	CLEAN	ODOR / GREEN COLOR	→	8' PLUS
E-5	CLEAN	CLEAN	ODOR / GREEN COLOR		

301 000161

Copied 2 [illegible] on 7/20/[illegible]

Coca-Cola Torrence Facility

Problem: 2900 to 5000 cubic yards of contaminated soil beneath the site. Contaminants are relatively non-volatile naphthalenes. Some concentrations are over the 1000 ppm concentration criteria for determining hazardous waste characteristics. Site has been razed and construction is ready to start.

Options:

[illegible] action — leave contamination in place and build facility. Regulators do not [illegible] to [illegible] contamination [illegible] does not [illegible] to be a threat to groundwater [illegible]

[illegible] expenses or [illegible] construction

[illegible] transactions involving this site may be complicated by the contamination issue (data is public information).

② Since some concentrations exceed hazardous waste level [illegible] regulators may eventually [illegible] an interest in this site or apply more stringent regulations

300 000675

in the future.

③ Once the facility is built, remediation will be virtually impossible.

2). Excavate and Dispose - excavate contaminated soil and dispose at an authorized landfill. If concentrations are over 1000ppm, this must be a Class I landfill. Soil with concentrations below 1000 ppm may be disposed at a Class III facility with prior approval

Advantages: excavation and removal will leave the site free and clear of the identified contaminants. Future property transactions or regulator intervention should not be a problem.

Disadvantages: ① Excavation and proper disposal is expensive. Disposal costs alone run $250 - 300.00 per cubic yard. Based on the estimated volume used, these costs will conservatively range from 870,000 to 1,500,000 at a Class I facility. Disposal at a Class III facility will be considerably cheaper, probably $145,000 to 250,000. These prices do not include excavation, transportation, documentation, or confirmational sampling or imported fill.

300 000674

(2) Placing material in a Class I landfill does not alleviate Coca-Cola's ownership of the material. Coca-Cola will maintain all ownership and liability and may potentially (very high potential) be required to participate in cleanup of the landfill at some point in time.

Disposal of material at a Class III facility (BKK Landfill was mentioned) may increase both liability and visibility. These landfills are typically not constructed to contain anything except household wastes. According to the California Department of Health, BKK was formerly a Class I facility which was closed in 1984. It was re-opened as a Class III facility in 1985 and has had numerous compliance violations. In addition, a residential area is reportedly located downwind the facility. This neighborhood was evacuated in 1986 because of methane leaks from BKK.

(3) Construction will be delayed about 2 weeks. This time will be necessary to excavate, remove, and dispose of soil. In addition, confirmatory sampling and chemical analysis should be performed.

3). Excavate and On-Site Treatment: excavate contaminated soils and treat on-site to reduce contaminant concentrations to acceptable levels. Once constructed, treatment cell will not affect construction or operation of plant.

advantages: ① end result of treatment will leave site free and clear of identified contaminants. Future property transactions or regulatory involvement should not present a problem.

② On-site treatment eliminates the secondary liability associated with disposal at landfills.

50x 200

③ On-site treatment is much less expensive [illegible] disposal at Class I landfill. Ballpark estimate for on-site treatment [illegible] 500,000 compared to 870,000 to 1.5 million for disposal. 50% represents

Disadvantages: ① Construction may be delayed up to six weeks to allow for system design and permitting (if required). Two weeks estimated for construction of treatment cell and placement of soil.

INTERNATIONAL TECHNOLOGY CORPORATION

4585 Pacheco Boulevard • Martinez, CA 94553
Telephone: (415) 372-9100

HAZARDOUS WASTE PREDISPOSAL EVALUATION

A. APPROVAL # 27955
~~EVALUATION #~~

IT USE ONLY
WASTE STREAM#
ACCT MGR
DATE SUBMITTED
CUSTOMER ID#
ANALYTICAL CHARGES
P.O./CONTRACT#
BILLING INSTRUCTIONS:

B. GENERATOR INFORMATION:
GENERATOR NAME COCA-COLA BOTTLING - L.A.
MAILING ADDRESS 1334 SOUTH CENTRAL
LOS ANGELES, CA 90021
SITE ADDRESS 19875-19899 PACIFIC GATEWAY
TORRANCE, CA
EPA ID# — — — — — — — — — — — —
TECHNICAL CONTACT RAUL RAMIREZ PHONE 213-746-5555

C. CUSTOMER INFORMATION:
CUSTOMER NAME ANCON ENVIRONMENTAL
ADDRESS 1022 EUBANK AVE.
WILMINGTON, CA 90744
CONTACT DALE STRIETER - MARK WARN
PHONE 213-518-0900
TRANSPORTER
EPA ID# — — — — — — — — — — — —

D. WASTE DESCRIPTION: CONTAMINATED SOIL
GENERATING PROCESS UNKNOWN TBD
VOLUME ____ GALLONS 500-1000 CUBIC YARDS
FREQUENCY ☐ One Time ☐ Week ☐ Month ☐ Quarter ☐ Year
METHOD OF SHIPMENT ☐ Bulk Liquid ☐ Bulk Solid ☐ Drums
DRUM TYPE AND SIZE

E. SHIPPING INFORMATION:
D.O.T. PROPER SHIPPING NAME California Regulated Waste Only
R.Q. ____ UN/NA# ____
HAZARD CLASS
RCRA WASTE? ☐ Yes ☒ No CODE
CA. HAZARDOUS WASTE? ☒ Yes ☐ No CODE
CA. RESTRICTED WASTE ☐ Yes ☒ No

F. HAZARDS:

	LOW	MOD.	HIGH	YES	NO	
INHALATION	☒	☐	☐	☐	☒	PYROPHORIC
DERMAL	☒	☐	☐	☐	☒	EXPLOSI
ORAL	☒	☐	☐	☐	☒	SHOCK SENSITI
FLAMMABLE	☒	☐	☐	☐	☒	WATER REACTI
REACTIVITY	☒	☐	☐	☐	☒	OTHER

MATERIAL SAFETY DATA SHEETS ATTACHED? NO
SPECIAL HANDLING NO

G.
COLOR DARK SOIL
ODOR
☒ Mild ☐ None
☐ Strong

H. PHYSICAL STATE:
☐ Liquids 0 % Free Liquids
☒ Solids ☐ Single Layer
☐ Sludge ☐ Double Layer
☐ Powder ☐ Multi-Layer

I. pH:
☐ <2 ☐ 10-12
☐ 2-6 ☐ >12
☒ 6-8 ☐ 7.8 Exact
☐ 8-10

J. NORMALITY:
☐ 0.1-1.0 ☐ 4.1-5.0
☐ 1.1-2.0 ☐ 5.1-6.0
☐ 2.1-3.0 ☐ > 6.0
☐ 3.1-4.0 ☐ ____ Exact

K. SPECIFIC GRAVITY:
☐ <0.8 ☐ 1.4-1.7
☐ 0.8-1.0 ☐ > 1.7
☐ 1.0-1.2 ☐ ____ Exact
☐ 1.2-1.4

L. FLASH POINT:
☐ 100F
☐ 100-140F
☒ 140-200F
Method CC

M. CHEMICAL COMPOSITION:

	%
SOIL	99
SEE ATTACHED ANALYSIS	
ACID TYPES	
BASE TYPE	
OXIDIZER TYPE	
WATER	
OIL	
TOTAL	100%

UNK	YES	NO			
☐	☐	☐	CYANIDES	< 0.04	PPM
☐	☐	☒	FORMALDEHYDE		PPM
☐	☐	☐	PCB	< 0.4	PPM
☐	☐	☒	PHENOLS		PPM
☐	☐	☐	SULFIDES	< 0.1	PPM
☐	☐	☒	AMMONIA		PPM
☐	☐	☒	DIOXINS		PPM
☐	☐	☒	PESTICIDE		PPM
			PESTICIDE GROUP		
☐	☐	☒	HALOGENATED ORGANICS		PPM
			OTHER		PPM

N. METALS:

	TOTAL		SOLUBLE	
Tl		PPM	Tl	P
As		PPM	As	P
Hg	SEE	PPM	Hg	P
Se	ATTACHED	PPM	Se	P
Pb		PPM	Pb	P
Cd	ANALYSIS	PPM	Cd	P
Ni		PPM	Ni	P
Cr		PPM	Cr	P
Cr+6		PPM	Cr+6	P
V		PPM	V	P
Be		PPM	Be	P
Cu		PPM	Cu	P
Fe		PPM	Fe	P
Co		PPM	Co	P
Zn		PPM	Zn	P
OTHER				
OTHER				

O. ANALYTICAL INSTRUCTIONS: ☐ STANDARD PREDISPOSAL ☐ RUSH (subject to surcharge) ☐ REQUEST FOR ANALYSIS
SPECIFIC INSTRUCTIONS: N/A

P. CERTIFICATION: I HEREBY CERTIFY THAT TO THE BEST OF MY KNOWLEDGE THE ABOVE INFORMATION AND ATTACHMENTS FULLY AND ACCURATELY CHARACTERIZE THE CHEMICAL AND PHYSICAL PROPERTIES OF THE WASTE STREAM. I UNDERSTAND THAT THIS SAMPLE IS ASSUMED BY IT CORPORATION TO BE REPRESENTATIVE OF THE WASTE STREAM AND THAT ACCEPTABILITY AND PRICE ESTIMATES BASED ON THIS SAMPLE MAY CHANGE ACCORDING TO THE COMPOSITION OF ACTUAL WASTES ANALYZED AT TRUCK RECEIVING.

NAME: DALE STRIETER SIGNATURE: Dale Strieter DATE: 4-5-89 PHONE: 213-518-090

301 000162

A.T. AND S.F.R.R.

UNKNOWN
UNDERGROUND
VESSEL

FENCE

WAREHOUSE
VACANT

PARKING
LOT

SUBJECT TO FIELD INSPECTION

The approval of these plans and/or specifications does not exempt them from strict compliance with all other pertinent Sections of the Municipal Code and other laws and regulations

APPROVED
62622

LOS ANGELES FIRE DEPARTMENT
BUREAU OF FIRE PREVENTION

BY Eric J. Heine
3-27-89

PACIFIC GATEWAY

301 000163

N

TITLE:
COCA-COLA LOS ANGELES
19875-19899 PACIFIC GATEWAY
LOS ANGELES, CALIFORNIA

SCALE: APPROXIMATE SCALE IN FEET
0 20 40 60 80

DATE:	3-24-89
DRAWN BY:	M.A. RADOVCIC
PREPARED FOR:	COCA-COLA-L.A.
JOB #:	302036
DRAWING NAME:	COCACOLA

ANCON ENVIRONMENTAL SERVICES
1022 EUBANK AVENUE
WILMINGTON, CA 90744
PHONE: (213) 518-0900

Call Neal - Oncor
5-25-89

Coca-Cola Drill boring
Fransio + 2 Labor
- holes 7 @ 10' 12 @ 5' 6 @ 20'
1 WK To complete drilling -
1 week from Monday 5th of JUNE

1st week of July to start rough grading

301 000164