SEMS-RM DOCID # 1166990

Winston H. Hickox
Secretary for Environmental Protection

California Regional Water Quality Control Board

Los Angeles Region

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

Gray Davis
Governor

MEETING ATTENDANCE SHEET

DATE: 7/11/01

SUBJECT: JERVIS WEBB STATUS

NAME	ORGANIZATION	PHONE NUMBER
REBECCA CHOU	RWQCB	213-576-6733
Steven Hariri	RWQCB	213-576-6745
MIKE SKLASH	DRAGUN CORP.	248-932-0228
Gary Cronk	IT Corp.	949-660-7511
GENE LUCERO	Latham & Watkins	213-891-8332
Mike Farley	Webb	248-553-1201
Michael Farley	Webb	213-891-7895
ARTHUR HEATH	RWQCB	213-576-6725

MEETING NOTE

BLAKE AT SITE 1981	BLAKE AT SITE UNTIL 1975, 1981 WEBB AT SITE. PAST FIVE YEARS VACANT. WOULD LIKE TO SALE PROPERTY. IN 1996 INVESTIGATION BEGAN. SOIL & GW INVESTIGATION. SPENT $250,000 TO DATE. SOME CONTRIBUTION TO GW IS FROM OFFSITE SOURCE.
	REVIEW OF SOIL CLOSURE WORKPLAN AND SUBMIT COMMENT LETTER FOR WORK TO BEGIN. REVIEW SITE PROPERTY ADJACENT TO WEBB SITE AND UNDERNEATH FOR CHEMICAL USE QUESTIONABLE.

WHEN JERVIS WEBB PURCHASED PROPERTY

7/11/01

Jervis B. Webb Co. of California

- Introduction to Case: Gene Lucero of Latham
- Soil Closure Status: Gary Cronk of IT
  - Investigative History
  - Remedial Results
  - Proposed Workplan
- Groundwater Source: Mike Sklash of Dragun
  - Site Hydrology and Groundwater Flow
  - TCE Distribution in Soil Gas and Soil
  - TCE Distribution in Groundwater
  - TCE/PCE Ratio

Goals

- Move Site quickly toward regulatory closure by approving and implementing Workplan
- NFA to Webb of California regarding groundwater at Site

5030 Firestone Blvd., South Gate

Small industrial site in a heavily industrialized area

- 1.4 acre site in the City of South Gate
- Numerous industries surround the Site
- City has long history of industrial operations
- Site is vacant for several years

Investigation and Remediation History

- 18 subsurface investigations/reports completed since 1996
- Completed in a systematic manner with prior RWQCB approval
- 9 CPT borings
- 37 soil gas points
- 18 soil borings
- 9 PIPP groundwater samples
- 5 groundwater wells

(continued...)

- Removal of clarifier and excavation of soil
- 7 soil vapor extraction wells and construction/operation of a SVE System
- Quarterly groundwater sampling & reporting since 1998 and quarterly soil remediation progress reporting since March 2000

Remedial Results

- 2-5 foot thick continuous clay layer at ~25 feet
- Operated a SVE for 16+ months (since March 2000)
- SVE has removed at least 155 pounds of VOCs from soil (88 percent removal efficiency)
- TCE vapor concentrations have decreased significantly
- Reached asymptotic levels
- Monitored for "rebound effect" (Sep and Dec 2000 & May 2001)

Effectiveness of SVE System

- 4 shallow wells screened above clay from 19-25 feet
- 3 deep wells screened below clay at 30-40 feet
- TCE levels decreased in shallow well SVE-1 from 10,000 ppmV to 11 ppmV
- TCE levels decreased in influent from 860 ppmV to 46 ppmV

Proposed Soil Confirmation Borings

- Three borings proposed:
  - CB-1 located 15 ft west of clarifier
  - CB-2 located 15 ft south of clarifier
  - CB-3 located 20 ft northeast of clarifier
- Borings to be extended to depth of 35-40 ft
- Soil samples collected at 5-ft increments and extracted by Encore sampler
- Analysis for VOCs by EPA 8260

Attenuation Factors

- Sample collected at 25 ft (clay) to be analyzed for geotechnical parameters:
  - silt-clay fraction (Hydrometer test)
  - bulk density
  - soil moisture
  - organic carbon
  - porosity
- Geotechnical data to be used in calculation of attenuation factors

Comprehensive Soil and Groundwater Investigation

The data indicate that TCE in groundwater originated upgradient and off-site

- Site hydrogeology
- Groundwater flow direction
- Distribution of TCE in soil gas and soil
- Distribution of TCE in groundwater
- TCE/PCE ratios

Site Hydrogeology

- Regional and nearby site investigations
- 18 soil borings, 5 monitoring wells, and 9 CPT
- 45 feet of unsaturated, unconsolidated, interbedded sandy, silty, and clayey soils
- Unconsolidated, interbedded sandy and silty soils to base of investigation at 73 fbgl
- 2-5 foot continuous, competent clay at ~25 fbgl

Groundwater Flow Direction

Firestone Boulevard is the upgradient property boundary

- All 32 monitoring events since 1998 indicate predominant flow direction is north to south
- Consistent with
  - Regional flow directions
  - Data from Mondo Chrome (located NW)
  - Data from Dial Corporation (Located S)
- Firestone Boulevard is the predominant upgradient property boundary

TCE in Soil Gas

Soil gas non-detects along upgradient property boundary

- 37 soil gas sampling locations
- ~60-foot spacing, testing at 2-5 fbgl
- Highest TCE centered near former clarifier
- Soil gas non-detect or low along northern property boundary

Distribution of TCE in Soil

Site soils cannot explain high TCE in groundwater

- 78 soil samples, 21 locations, to > 40 fbgl
- Low concentrations, only two samples

  > 10 mg/kg TCE (B4-20.5', B18-21')
- Site soils cannot explain high concentrations observed in groundwater (>25,000 ug/l)
- No TCE in soil on upgradient boundary (MW-2)

Distribution of TCE in Groundwater

TCE upgradient cannot be explained by Site soils

- 11 quarterly sampling events since 11/98
- Concentrations in groundwater and soil inconsistent wrt location and magnitude
  - –High TCE > 2000 ug/l on upgradient property boundary, none in soil there
  - –Very high TCE > 25,000 ug/l at CPT-6 and CPT-7, upgradient of clarifier
  - –TCE concentrations in groundwater much too high wrt observed on-site soil concentrations

TCE/PCE Ratios

TCE/PCE ratio indicates off-site source of groundwater TCE

- Ratio of TCE:PCE
  - –Soil gas.....2.5:1
  - –Soil.....1:1 to 2:1
  - –Groundwater.....150:1 to 300:1
- TCE and PCE in groundwater from off-site source

Soil: Water Table up to Clay Unit

TCE in soil just above water table originates from groundwater

- Trend from water table is upward decrease in soil TCE
  - Inconsistent with on-site source of TCE
  - Especially at B15 and B17
- TCE in soil between water table and clay unit originates from groundwater
  - Due to water table fluctuations and/or volatization from groundwater

Summary

Site hydrogeology is well-documented

- Comprehensive soil and groundwater investigation at Site
- Continuous, competent clay unit at ~25 fbgl
- Water table at ~45 fbgl
- Firestone Blvd is upgradient property boundary

Summary - continued

Indications of Off-site Source of TCE

- High TCE in groundwater along upgradient property boundary, not in soil
- High TCE in groundwater at CPT-6 and CPT-7, upgradient of clarifier, but not in soil
- TCE in groundwater much greater than in soil
- TCE/PCE ratio

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MEETING ATTENDANCE SHEET

DATE: 5/31/01

SUBJECT: JERVIS WEBB STATUS MEETING

NAME	ORGANIZATION	PHONE NUMBER
Steven Hariri	**RWQCB**	**213-576-6745**
Gary Cronk	IT Corp.	949-660-7511
MIKE SKLASH	DRAGUN CORP.	248-932-0226
Richard Farley	LAW	213-891-7895
Mike Farley	Webb	248-553-1201

MEETING NOTE

THEY BELIVE THAT JERVIS WEBB IS NOT RESPONSIBLE FOR GW CONTAMINATION AND NO FURTHER INVESTIGATION NEEDED.

California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

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Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

June 29, 2001

Mr. Michael Farley
Jervis B. Webb Company
34375 W. Twelve Mile Rd.
Farmington Hills, MI 48331-5624

ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND CLEANUPS COST RECOVERY PROGRAM
JERVIS WEBB CO.
5030 FIRESTONE BOULEVARD, SOUTH GATE
SLIC NO. 0744 (PCA NO. 2042J)

Dear Mr. Farley:

Section 13304 of the California Water Code (Porter Cologne) allows the Regional Board to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at this site in accordance with our letter dated February 2, 1998. In compliance with Section 13365 of the California Water Code, this letter is being sent to provide you with the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.
2. A statement of the expected outcome of that work.
3. The billing rates for all individuals and classes of employees expected to engage in the work.
4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Performed

Regional Board staff estimate that the following work will be performed during fiscal year 2001/2002 (July 1, 2001 to June 30, 2002):

- Review soil and groundwater investigation reports, groundwater monitoring reports, and other project technical reports that may be necessary.
- Provide written correspondences and telephone communications with Jervis B. Webb Company, its representatives and interested third parties.
- Conduct internal communications (i.e. meeting, memos, management reports, etc.) regarding the project.
- Meetings with Jervis B. Webb Company and its representatives.
- Site inspection and sampling.

Statement of Expected Outcome

The following is the expected outcome of work that will be performed during fiscal year 2001/2002:

- Track progress of investigation.
- Written comments on reports to be submitted as appropriate.
- Verify adequacy of reports.

Billing Rates

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rates is approximately $80.00 per hour.

Estimation of Expected Charges

Board staff expects to charge about 110 hours of work related to this site during fiscal year 2001/2002. Based on the average billing rate of $80 per hour, the estimated billing charge for this site during fiscal year 2001/2002 is $8,800.

If you have any questions, please contact Mr. Steven Hariri (213) 576-6745.

Sincerely,

Dennis A. Dickerson
Executive Officer

Enclosure: Billing Rates

Cc: Donna Vercruyssen, SWRCB - CWP

FAX Transmission

To:	Name	Steven Hariri
	Organization	CA RWQCB
	Mail Stop	
	Fax No.	213-576 6717
	Verification No.	
From:	Name	Eric Yunker
	Address	U.S. Environmental Protection Agency Region 9, Superfund Division 75 Hawthorne Street San Francisco, CA 94105
	Phone No.	415 744 2245
	Fax No.	(415) 744-1796
Date	6-21-01	
No. of Pages (Including Cover)	2	
Subject	Cooper Drum Site	
Note	Final NPL Listing Press Release	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

United States
Environmental Protection
Agency

Regional Administrator
75 Hawthorne Street
San Francisco, CA 94105-3901

Region 9
Arizona, California,
Hawaii, Nevada
Pacific Islands

EPA Environmental News

For Immediate Release: June 20, 2001
Contact: Leo Kay, Press Office, 415/744-2201

EPA NAMES SOUTHGATE, CA FACILITY A SUPERFUND SITE

SAN FRANCISCO – The U.S. Environmental Protection Agency finalized the Cooper Drum Facility in South Gate, Calif. as a federal Superfund site late last week, making available federal funds to perform a long-term site cleanup.

From 1941 until 1992, Cooper Drum Co. reconditioned closed-topped, steel drums containing a variety of industrial chemicals. Soil at the 4-acre facility is contaminated with a variety of compounds, including volatile organic compounds. Groundwater beneath the site is also contaminated with volatile organic compounds, including tetrachloroethylene (PCE) and trichloroethylene (TCE).

"This Superfund listing will give us the formal framework and regulatory authority necessary to clean up this site." said Keith Takata, director of the U.S. EPA's Superfund program in San Francisco. "With the listing process complete, we can now roll up our sleeves and get to work on devising a cleanup plan."

The EPA will complete a report that will define the nature and extent of the contamination and evaluate cleanup alternatives – called a "remedial investigation/feasability study" – before the end of the year.

In 1987, a highly caustic liquid from the facility migrated underground onto the nearby Tweedy Elementary School. Although the soil contamination was cleaned up, the release and additional airborne releases from nearby industrial sites contributed to the school's closure.

That same year, the city of South Gate closed four municipal wells due to volatile organic compound contamination. Recent investigations have shown that the groundwater contamination beneath the Cooper Drum Site has not impacted the city's municipal wells. Local municipal wells supply drinking water to approximately 335,000 people.

Cooper Drum is now the 16th Superfund site in Los Angeles County and the 97th in California. There are roughly 1,300 Superfund sites nationwide.

Last week's listing followed a 60-day public comment period for the proposed listing that began on January 11. The EPA received no comments on the proposal.

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http://www.epa.gov/region09

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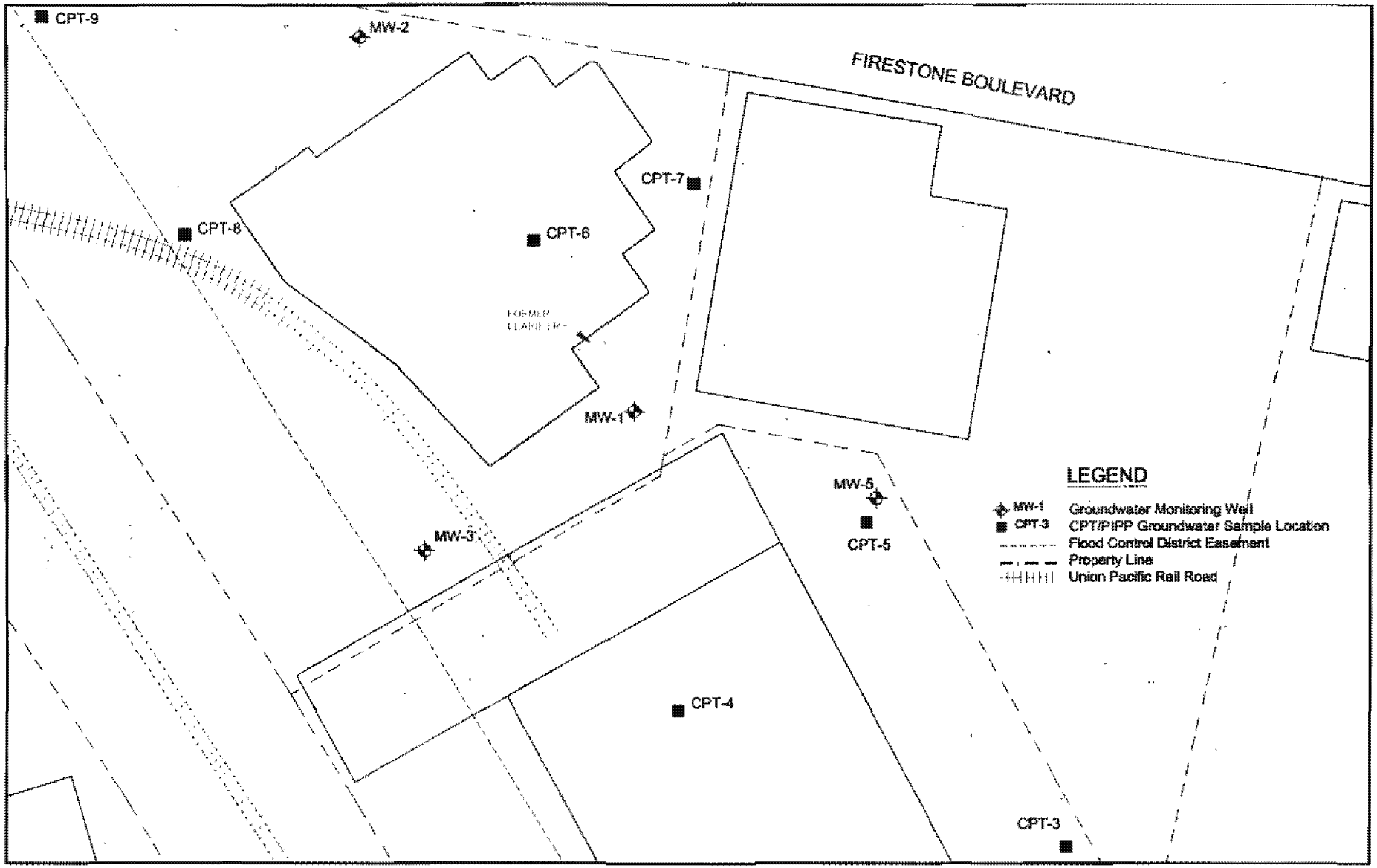
MB Miller	6-21-01						



APPROXIMATE SCALE

0 60 120 FEET

NOTE: All locations are approximate

REFERENCE: EKI, 1999, Figure 2.

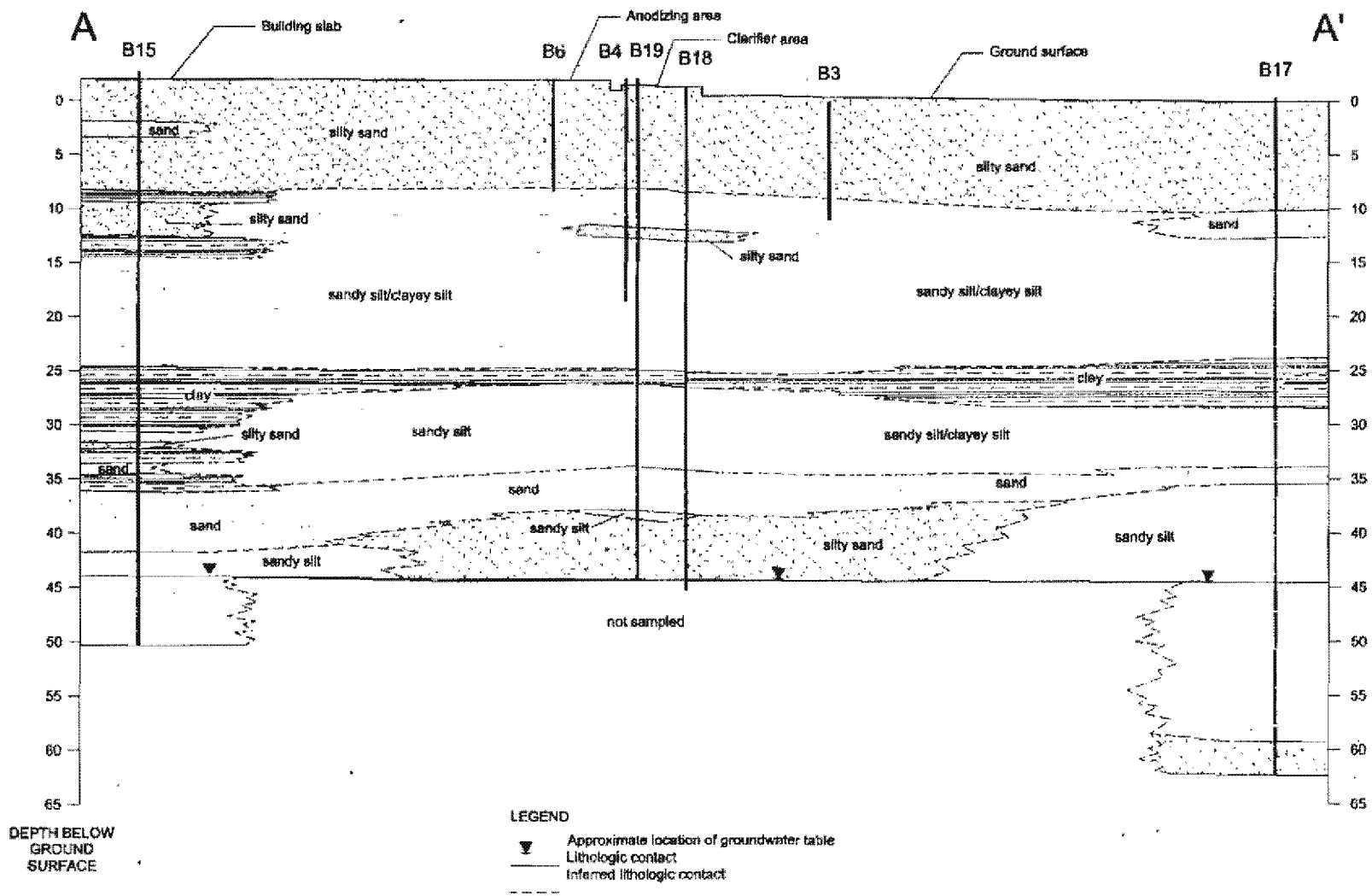
IT CORPORATION

JERVIS B. WEBB OF CALIFORNIA

FIGURE 4

MONITORING WELL AND CPT/PIPP SAMPLE LOCATIONS

JERVIS B. WEBB OF CALIFORNIA
5030 FIRESTONE BOULEVARD
SOUTH GATE, CALIFORNIA



Reference: EKI, 1998a, Figure 10 (modified).

IT CORPORATION

JERVIS B. WEBB OF CALIFORNIA

FIGURE 5

GEOLOGIC CROSS-SECTION A-A'

JERVIS B. WEBB OF CALIFORNIA
5030 FIRESTONE BOULEVARD
SOUTH GATE, CALIFORNIA

828208-B2

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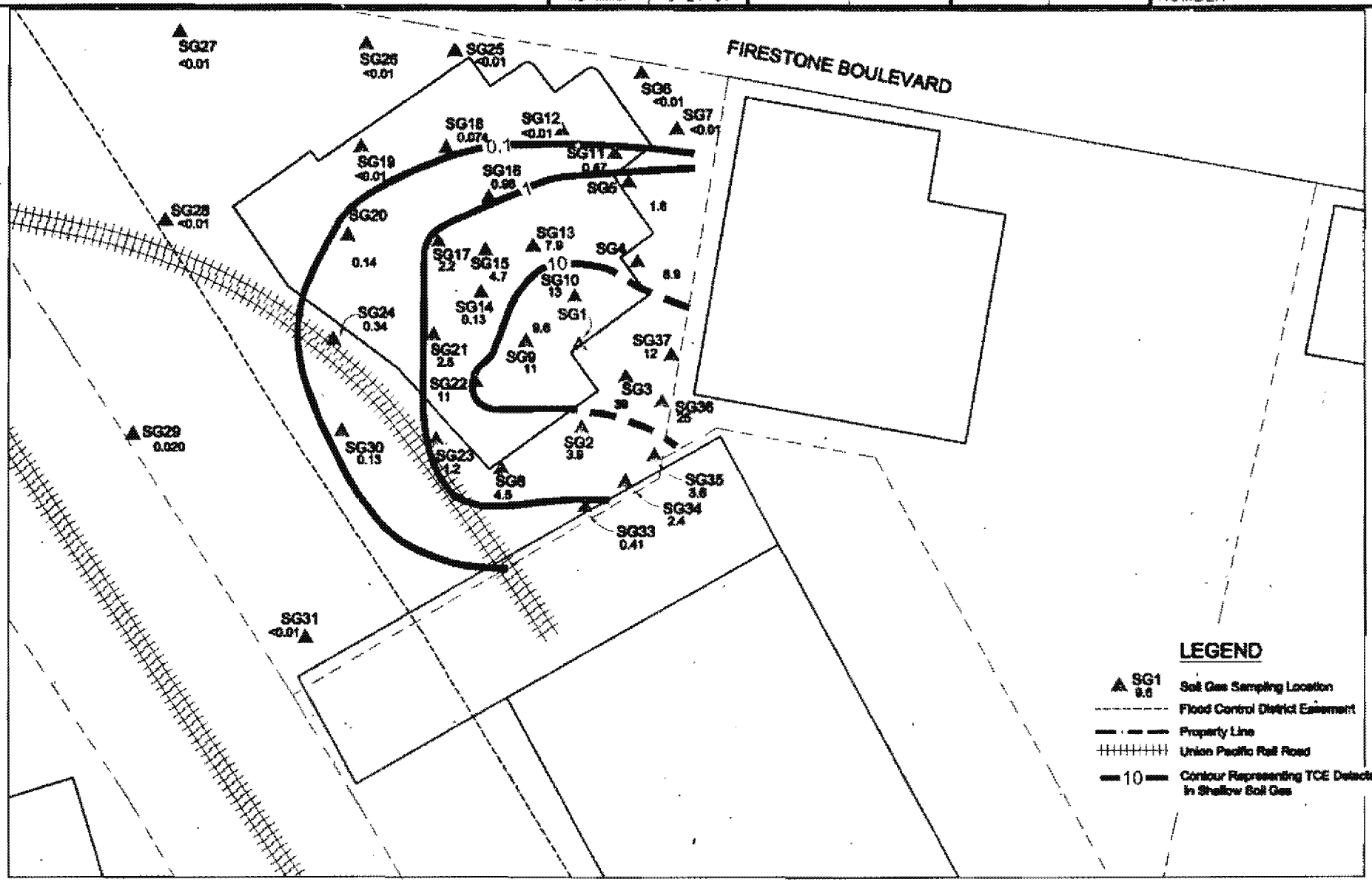
MB Miller 6-21-01			828208-A7



NOTES:
1. All locations are approximate.
2. Soil gas concentration contours in units of micrograms per liter by volume in air.
3. Contours reproduced from EKI, 1998a.

REFERENCE: EKI, 1998a, Figure 4.

APPROXIMATE SCALE
0 60 120 FEET

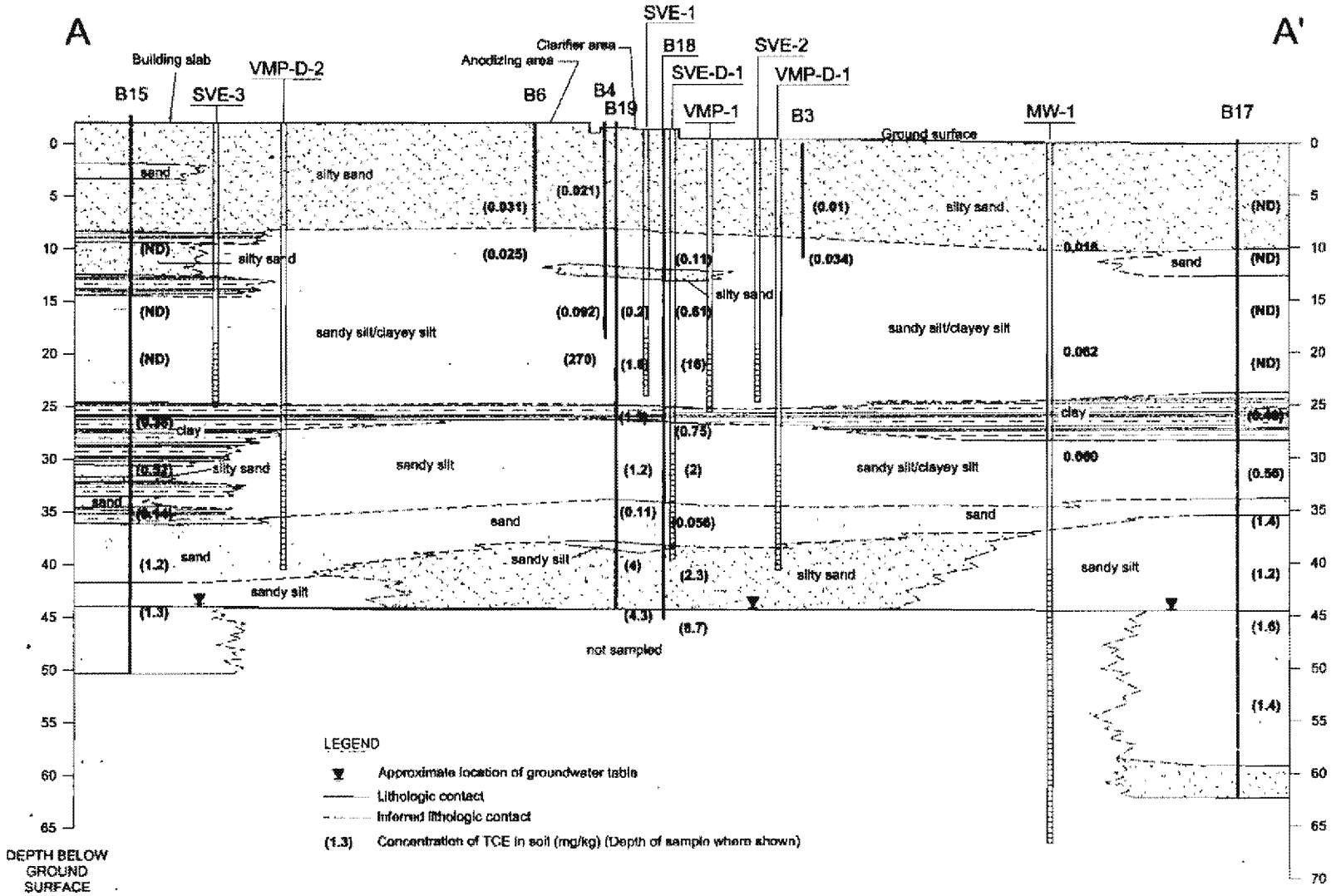
IT CORPORATION

JERVIS B. WEBB OF CALIFORNIA

FIGURE 9

TCE IN SHALLOW SOIL-GAS

JERVIS B. WEBB OF CALIFORNIA
5030 FIRESTONE BOULEVARD
SOUTH GATE, CALIFORNIA



Reference: EKI, 1998a, Figure 10 (modified).

IT CORPORATION

JERVIS B. WEBB OF CALIFORNIA

FIGURE 12
VERTICAL DISTRIBUTION OF TCE IN SOIL (SECTION A-A')

JERVIS B. WEBB OF CALIFORNIA
5030 FIRESTONE BOULEVARD
SOUTH GATE, CALIFORNIA

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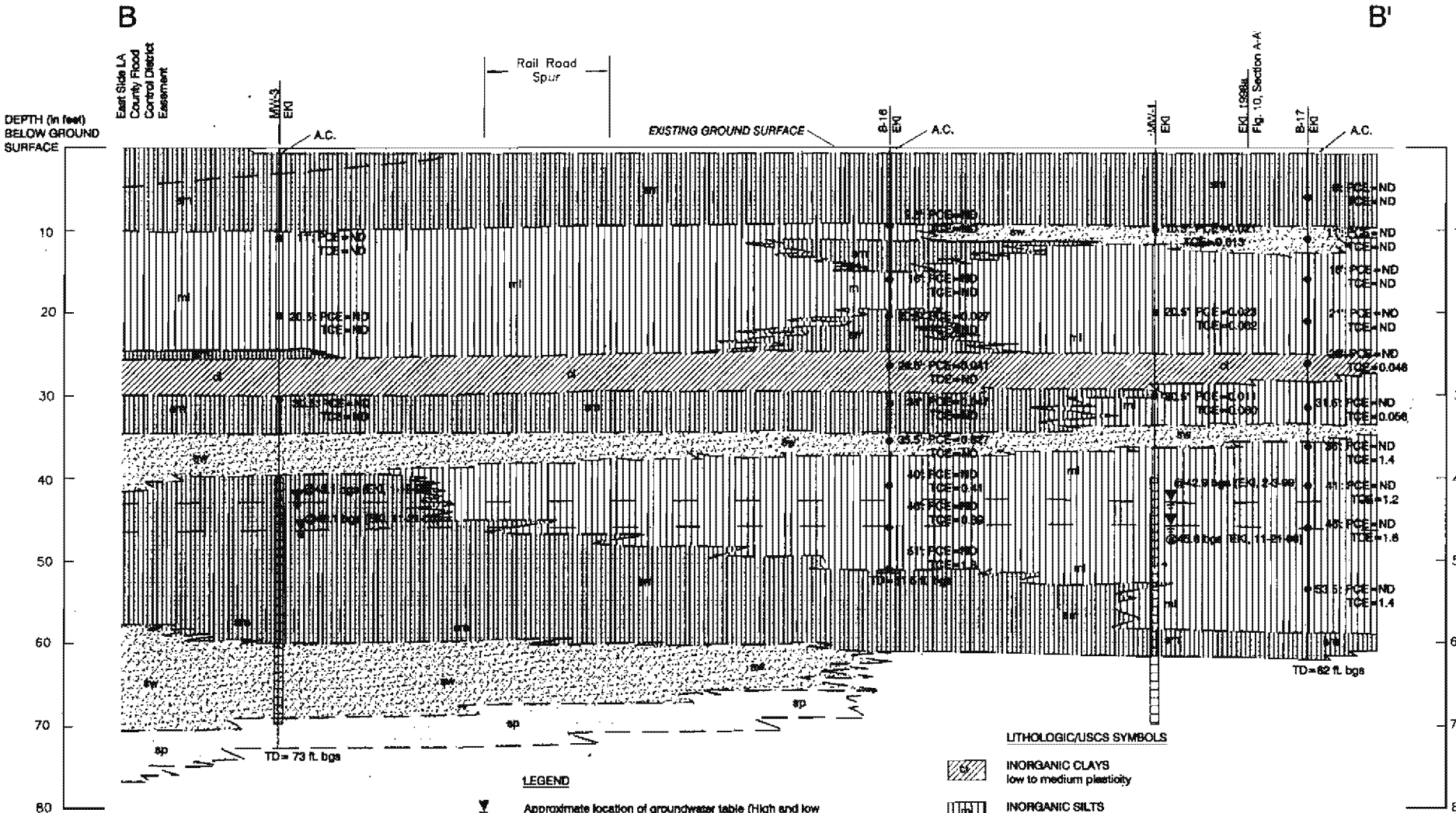
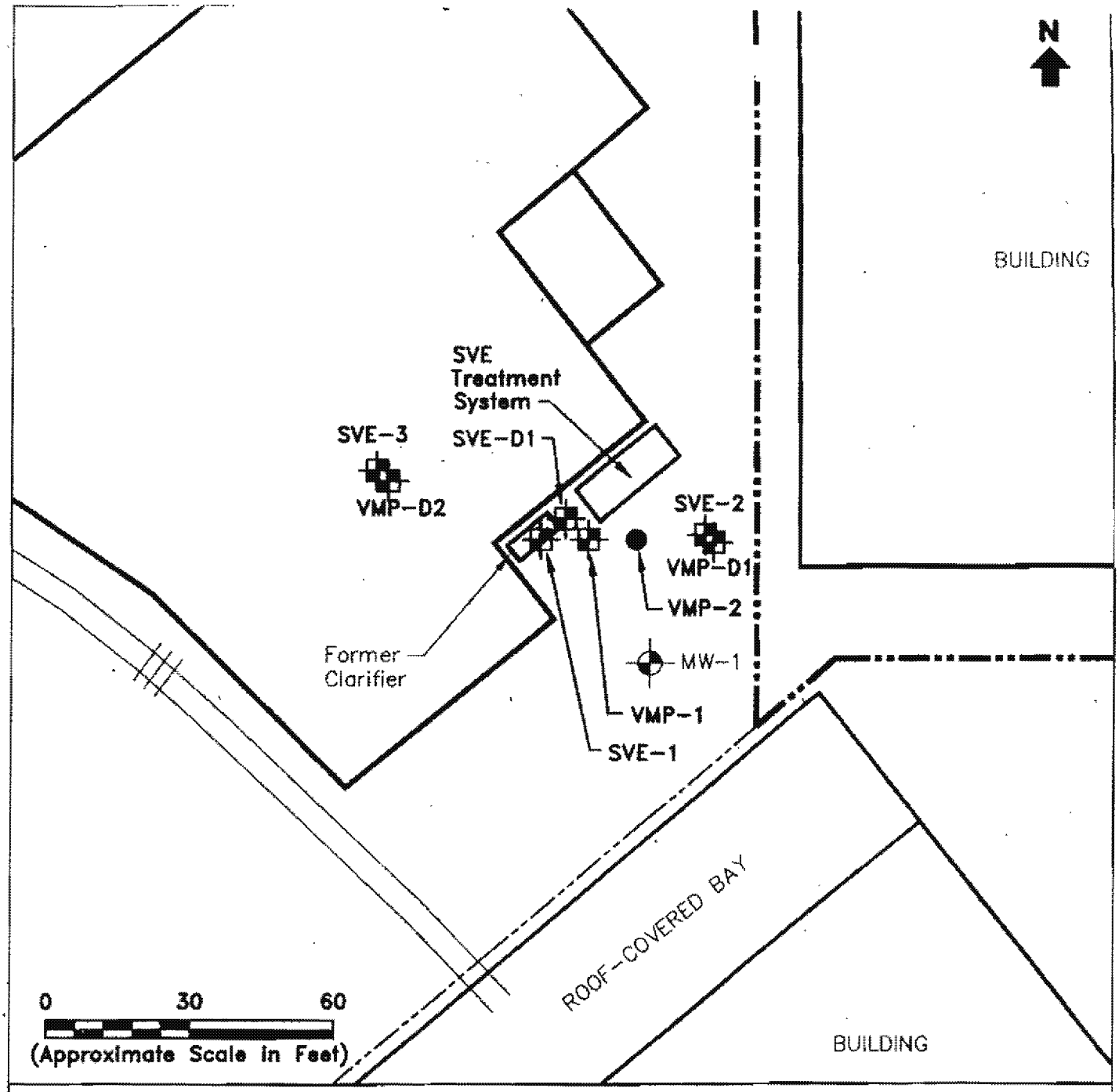

B
B'
East Side LA County Flood Control District Easement
MW-3 EKI
Rail Road Spur
EXISTING GROUND SURFACE
B-16 EKI
MW-1 EKI
EKI, 1998a Fig. 10, Section A-A'
B-17 EKI
A.C.
DEPTH (in feet) BELOW GROUND SURFACE
0
10
20
30
40
50
60
70
80
TD= 73 ft. bgs
TD=62 ft. bgs
LEGEND
Approximate location of groundwater table (High and low stands)
Lithologic contact; solid where approximate
Inferred lithologic contact
51': PCE=ND TCE=1.3
Sample, depth (bgs) and PCE/TCE concentrations (in milligrams/kilogram)
A.C.
Asphalt / Concrete
LITHOLOGIC/USCS SYMBOLS
INORGANIC CLAYS low to medium plasticity
INORGANIC SILTS very fine sands
SILTY SANDS
Poorly graded SAND with GRAVEL
Well graded SAND with GRAVEL
SCALE
0
12
24 FEET
IT CORPORATION
JERVIS B. WEBB OF CALIFORNIA
FIGURE 13
VERTICAL DISTRIBUTION OF PCE AND TCE IN SOIL
JERVIS B. WEBB OF CALIFORNIA
5030 FIRESTONE BOULEVARD
SOUTH GATE, CALIFORNIA
DRAWING NUMBER 828208-B6
APPROVED BY
CHECKED BY
DRAWN BY M. Schrage
6-20-01



LEGEND

- Location of Soil Vapor Extraction Wells
- Location of Vapor Monitoring Probe
- Location of Groundwater Monitoring Well
- Property Line/Site Boundary
- Building
- Railroad Spur

Notes:

1. All locations are approximate.
2. SVE = Soil Vapor Extraction

Erler & Kalinowski, Inc.

Layout of the Soil Vapor Extraction System

Jervis B. Webb Company of California
South Gate, California
April 2001
EKI 991103.01

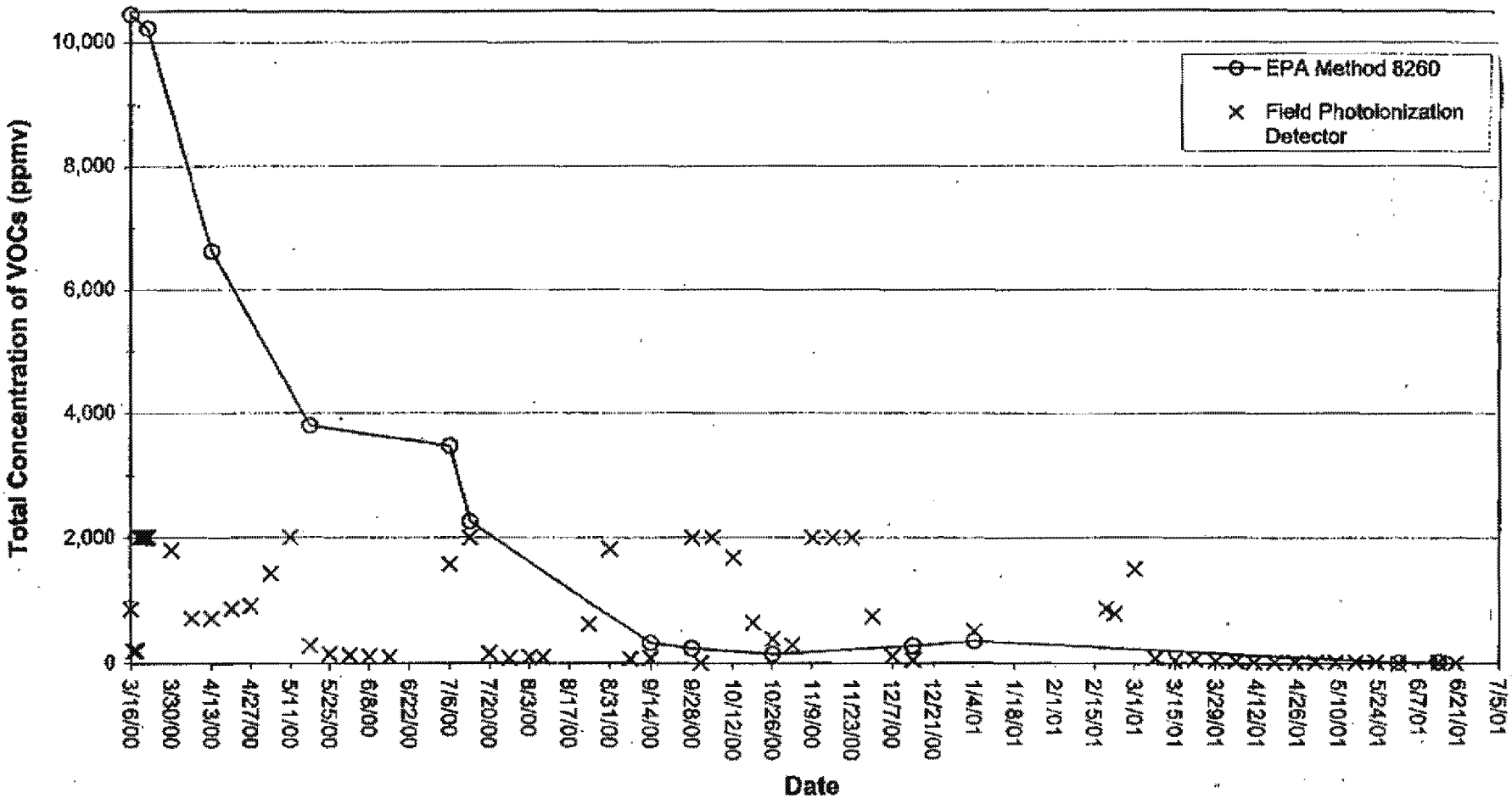
Figure 7

FIGURE 8b

Total Concentrations of VOCs versus Time: Extraction Well SVE-1

Quarterly Progress Report for April through June 2001

Jervis B. Webb Company of California, 5030 Firestone Boulevard, South Gate, California



Erler & Kalinowski, Inc.

EKI 991103.01
2001-Q2 Table 4 & Figures 8-9

8/27/01

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Secretary for Environmental Protection

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Michael Foley	Law	213-891-7895
Mike Farley	Webb	248-553-1201

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THEY BELIEVE THAT JENNIS WEBB IS NOT RESPONSIBLE FOR GW CONTAMINATION AND NO FURTHER INVESTIGATION NEEDED.

FAX Transmission

To:	Name	Steven HARIRI
	Organization	LA-RWQCB
	Mail Stop	
	Fax No.	213 576 6717
	Verification No.	
From:	Name	ERIC YUNKER
	Address	U.S. Environmental Protection Agency Region 9, Superfund Division (SFD-7-3) 75 Hawthorne Street San Francisco, CA 94105
	Phone No.	415 744 2245
	Fax No.	(415) 744-1796 or 2180
Date	5-29-01	
No. of Pages (Including Cover)	3	
Subject	COOPER DRUM GW Sampling Results	
Note	Note high levels of TCE AT CPT 12 and MW 19 which definitely not coming from COOPER DRUM — Do you have any Ground WATER Sampling from MacLEOD METALS?	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

COOPER DRUM CO. – Depth Discreet GW SAMPLING

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
SB-3	82	8.1	7.4	<0.5
	82	<1	<1	<0.5
	103	<1	<1	<0.5
	132	<1	<1	<0.5
	151	<1	<1	<0.5

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-4	61	220	270	<1
	74	<1	<1	<1
	96	<1	<1	<1

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-12	62	45	12	<1
	73	760	25	<0.5
	99	<1	<1	<1
	125	.8	<1	<1

FALL 1998

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-7	64	9	5	<0.5
	81	48	<1	<0.5
	97	<1	<1	<0.5
	97 (dupl.)	<1	<1	<0.5
	118	100	4	<0.5

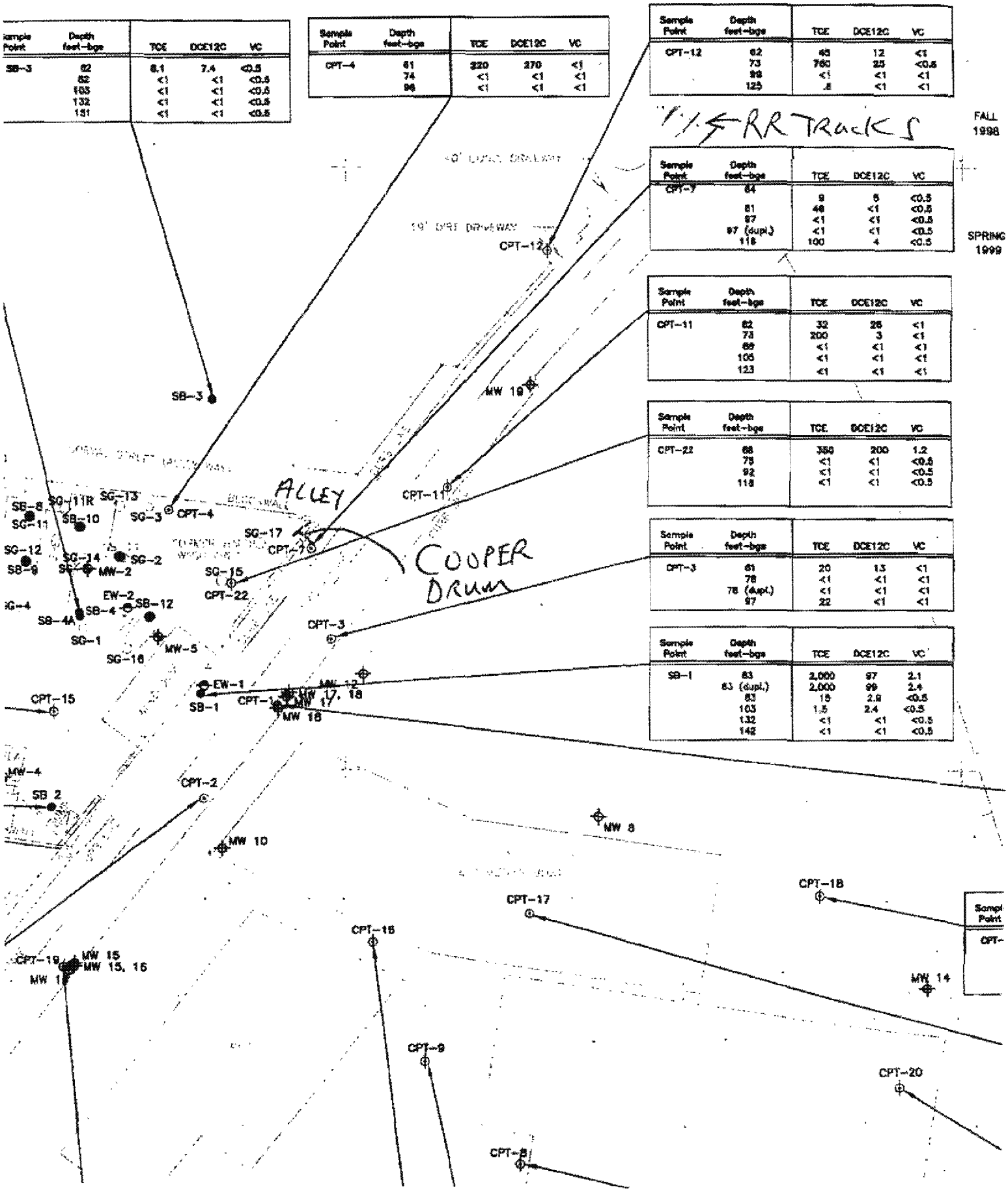
SPRING 1999

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-11	62	32	26	<1
	73	200	3	<1
	89	<1	<1	<1
	105	<1	<1	<1
	123	<1	<1	<1

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-22	68	350	200	1.2
	79	<1	<1	<0.5
	92	<1	<1	<0.5
	118	<1	<1	<0.5

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
CPT-3	61	20	13	<1
	78	<1	<1	<1
	78 (dupl.)	<1	<1	<1
	97	22	<1	<1

Sample Point	Depth feet-bgs	TCE	DCE12C	VC
SB-1	83	2,000	97	2.1
	83 (dupl.)	2,000	99	2.4
	83	15	2.9	<0.5
	103	1.5	2.4	<0.5
	132	<1	<1	<0.5
	142	<1	<1	<0.5

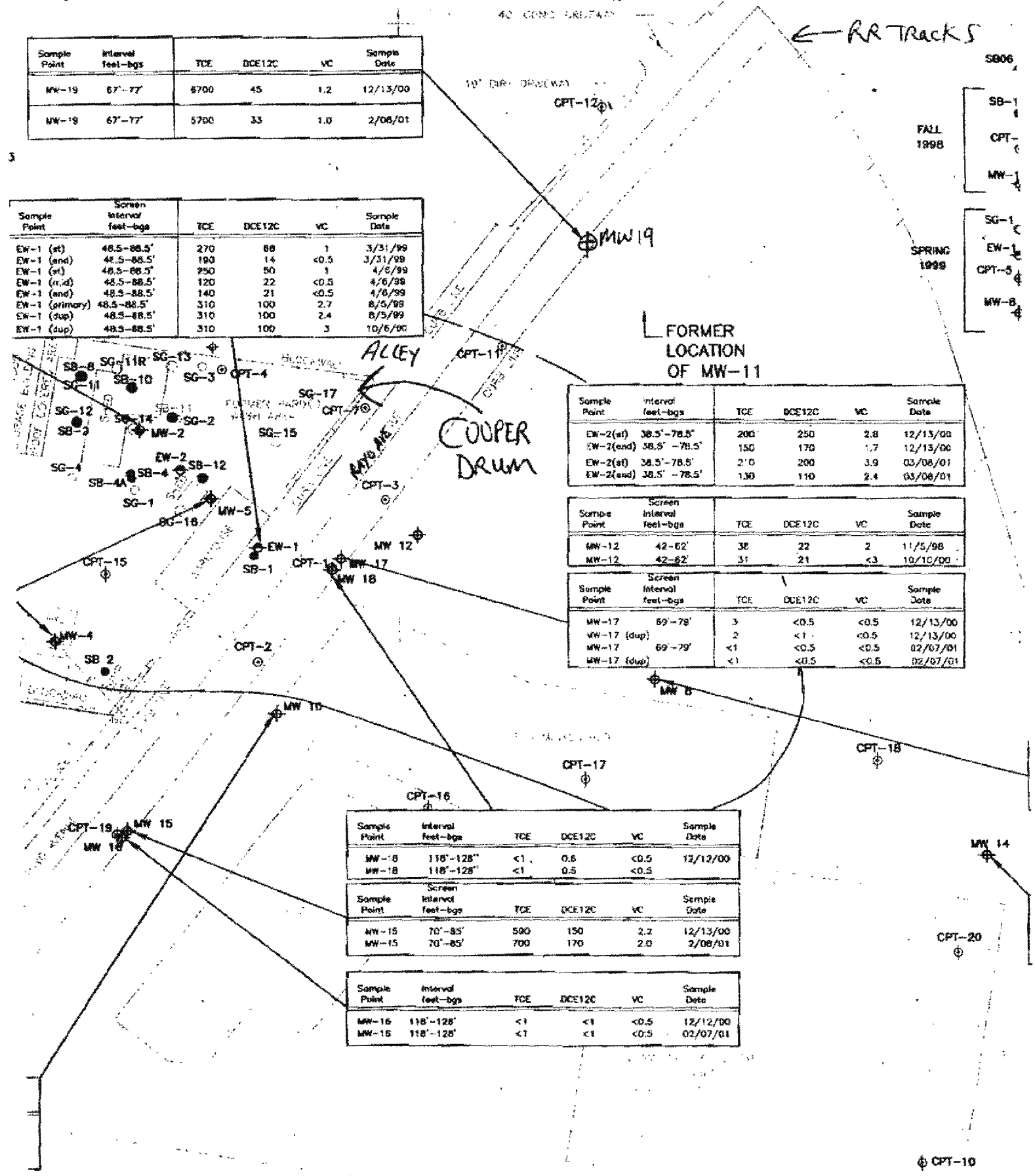


SG-1

COOPER DRUM CO. - GW MONITORING WELL RESULTS - VOCS

Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-19	67'-77'	6700	45	1.2	12/13/00
MW-19	67'-77'	5700	33	1.0	2/08/01

Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
EW-1 (st)	48.5-88.5'	270	88	1	3/31/99
EW-1 (end)	48.5-88.5'	190	14	<0.5	3/31/99
EW-1 (st)	48.5-88.5'	950	50	1	4/6/99
EW-1 (mid)	48.5-88.5'	120	22	<0.5	4/6/99
EW-1 (end)	48.5-88.5'	140	21	<0.5	4/6/99
EW-1 (primary)	48.5-88.5'	310	100	2.7	8/5/99
EW-1 (dup)	48.5-88.5'	310	100	2.4	8/5/99
EW-1 (dup)	48.5-88.5'	310	100	3	10/6/00



Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
EW-2(st)	38.5'-78.5'	200	250	2.8	12/13/00
EW-2(end)	38.5' -78.5'	150	170	1.7	12/13/00
EW-2(st)	38.5'-78.5'	210	200	3.9	03/08/01
EW-2(end)	38.5' -78.5'	130	110	2.4	03/08/01

Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-12	42-62'	38	22	2	11/5/98
MW-12	42-62'	31	21	<3	10/10/00

Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-17	69'-79'	3	<0.5	<0.5	12/13/00
MW-17 (dup)		2	<1	<0.5	12/13/00
MW-17	69'-79'	<1	<0.5	<0.5	02/07/01
MW-17 (dup)		<1	<0.5	<0.5	02/07/01

Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-18	118'-128"	<1	0.6	<0.5	12/12/00
MW-18	118'-128"	<1	0.5	<0.5	

Sample Point	Screen Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-15	70'-85'	590	150	2.2	12/13/00
MW-15	70'-85'	700	170	2.0	2/08/01

Sample Point	Interval feet-bgs	TCE	DCE12C	VC	Sample Date
MW-16	118'-128'	<1	<1	<0.5	12/12/00
MW-16	118'-128'	<1	<1	<0.5	02/07/01

BOSTON
CHICAGO
FRANKFURT
HAMBURG
HONG KONG
LONDON
LOS ANGELES
MOSCOW
NEW JERSEY

Latham & Watkins
ATTORNEYS AT LAW
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ORANGE COUNTY
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
SINGAPORE
TOKYO
WASHINGTON, D.C.

2001 MAY 23 P 1:52

May 23, 2001

VIA MESSENGER

Mr. Steven Hariri
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
320 4th Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California
5030 Firestone Blvd./ 9301 Rayo Avenue, South Gate, California
RWQCB SLIC File No. 744 (the "Site)

Dear Mr. Hariri:

On behalf of Jervis B. Webb of California, we are submitting two documents concerning the Site. First, we are forwarding two copies of the Quarterly Progress Report for January through March 2001, dated 30 April 2001, prepared by EKI.

Second, as preparation for sale of the Firestone property, IT Corporation and Dragun Corporation conducted an independent, comprehensive review of the hydrogeologic, soil gas, soil chemistry and groundwater chemistry site data. After extensive review of available data, IT/Dragun have concluded that groundwater contamination beneath the Site is not related to Site activities but comes from an upgradient, off-site source. This conclusion is significant, and we are therefore forwarding two copies of the IT/Dragun Groundwater and Soil Evaluation Report dated May 22, 2001 for your review.

As you know, the 5030 Firestone Blvd. property is Webb of California's sole asset and we believe we may be close to a sale of the property. Accordingly, we are requesting a meeting with you and Rebecca Chou to discuss (1) a plan for confirmatory soil sampling as we seek soil closure for the Site and (2) IT/Dragun's analysis of the off-site origin of groundwater contamination under the Site, which we believe strongly supports a conclusion by the Board that Webb of California is not responsible for groundwater contamination under the Site and should not be required to conduct further groundwater investigation or remediation activities a the Site. We will call you next week to schedule a convenient day and time for such a meeting.

Thank you for your continued courtesy.

Yours very truly,

Michael Scott Feeley
of LATHAM & WATKINS

Enclosures

633 WEST FIFTH STREET, SUITE 4000 • LOS ANGELES, CALIFORNIA 90071-2007
TELEPHONE: (213) 485-1234 • FAX (213) 891-8763

Winston H. Hickox
Secretary for Environmental Protection

California Regional Water Quality Control Board

Los Angeles Region

Gray Davis
Governor

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

MEETING ATTENDANCE SHEET

DATE: 2/08/01

SUBJECT: JERVIS WEBB SITE STATUS

NAME	ORGANIZATION	PHONE NUMBER
Steven Hariri	RWQCB	213-576-6745
REBECCA CHU	"	213-576-6733
Michael Feeley	Latham & Watkins	213-891-7895
Michael Parley	JERVIS B. WEBB	248-553-1201
STEVE CHAMBERS	ERLER & KALINOWSKI, INC.	310-314-8855

MEETING NOTE

BLAKE RIVET COMPANY 1970's 1960's JERVIS WEBB BOUGHT PROPERTIES 1980's RIVET COMPANY LEFT AS TENANT. SPENT $550,000 ON PROPERTIES SO FAR IN ENVIRONMENTAL COSTS. JERVIS WEBB PAYING FOR ALL ENV CLEAN UP COSTS.

SOIL CLEANUP LEVEL & CONFIRMATION PLAN } WILL RESPOND
GW DELINEATION WORKPLAN
RUN GW FOR METALS

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

3250 Ocean Park Boulevard, Suite 385
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

FACSIMILE TRANSMISSION COVER SHEET

(X) Please Deliver Immediately

( ) Hard Copy in the Mail

DATE: 24 January 2001 TIME: 11:15 AM

FROM: Steven R. Chambers, Ph.D. PAGES (including cover sheet): 4

PROJECT: Webb/South Gate, CA PROJECT #: 991103.00

TO THE FOLLOWING:

NAME:	Mr. Steven Hariri	NAME:	
COMPANY:	LARWQCB	COMPANY:	
FAX NO.:	213-576-6640	FAX NO.:	

( ) Report (X) As Requested

( ) Letter/Memorandum ( ) For Approval

( ) Specifications ( ) For Review and Comments

(X) Other (X) For Information and Coordination

MESSAGE:

Mr. Hariri:

The completed AB681 form that you requested for the Jervis B. Webb Company of California site in South Gate, California (RWQCB SLIC File No. 744) is attached. We look forward to meeting with you and Rebecca Chou at 1 PM on 8 February 2001.

Cc: Michael J. Farley, Jervis B. Webb Company

JERVIS B. WEBB COMPANY
Law Department

34375 WEST TWELVE MILE ROAD
FARMINGTON HILLS, MICHIGAN 48331-5624

MICHAEL J. FARLEY
ASSOCIATE GENERAL COUNSEL

TELEPHONE: 1-248-553-1201
FACSIMILE: 1-248-553-1292
E-MAIL: LAW@JERVISWEBB.COM

January 23, 2001

VIA TELECOPY AND U.S. MAIL

Steven Chambers, Ph.D.
Erler & Kalinowski
3250 Ocean Boulevard
Suite 385
Santa Monica, CA 90405

Re: California Regional Water Quality Control Board

Dear Steve:

In response to the request from the California Regional Water Quality Control Board, enclosed please find the completed declaration providing information on all current fee titleholders to the Webb of California property located at 5030 Firestone Blvd., South Gate, California. Please submit the form to the Water Quality Control Board on Webb's behalf.

Please call me if you have any questions

Sincerely,

JERVIS B. WEBB COMPANY

Michael J. Farley
Associate General Counsel

MJF/sma
Enclosure
IM2132/1454

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

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

Gray Davis
Governor

LEAKING UNDERGROUND STORAGE TANK PROGRAM
CERTIFICATION DECLARATION
FOR COMPLIANCE WITH
FEE TITLE HOLDER NOTIFICATION REQUIREMENTS
(ASSEMBLY BILL 681)

Please Print or Type

Fee Title Holder(s): Jervis B. Webb Company of California

Mailing Address: c/o Jervis B. Webb Company
34375 West Twelve Mile Road, Farmington Hills, MI 48331-562

Contact Person: Michael J. Farley

Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292

Site Name: Jervis B. Webb Company of California

Address: 5030 Firestone Blvd., South Gate, CA 90280

Contact Person: Michael J. Farley

Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292

File Number: _____

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." (See attached page for who shall sign the Certification Declaration).

Steven F. Hodkinson
Printed Name of Person Signing

Vice President, Treasurer
Official Title

Steven F. Hodkinson
Signature

01/23/01
Date Signed

California Environmental Protection Agency

The certification declaration form must be signed as follows:

1. For a corporation - by a responsible corporate officer, which means: (i) by a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy of decision making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million, if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

2. For a partnership or sole proprietorship – by a general partner or the proprietor respectively.

3. For a municipality, state, federal, or public agency - by either a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes (i) the chief executive officer of the agency or (ii) a senior executive officer having responsibility for the overall operations or a principal geographic unit.

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

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

Gray Davis
Governor

LEAKING UNDERGROUND STORAGE TANK PROGRAM
CERTIFICATION DECLARATION
FOR COMPLIANCE WITH
FEE TITLE HOLDER NOTIFICATION REQUIREMENTS
(ASSEMBLY BILL 681)

Please Print or Type

Fee Title Holder(s): Jervis B. Webb Company of California

Mailing Address: c/o Jervis B. Webb Company
34375 West Twelve Mile Road, Farmington Hills, MI 48331-562

Contact Person: Michael J. Farley

Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292

Site Name: Jervis B. Webb Company of California

Address: 5030 Firestone Blvd., South Gate, CA 90280

Contact Person: Michael J. Farley

Telephone Number / Fax Number: (248) 553-1201 (248) 553-1292

File Number:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." (See attached page for who shall sign the Certification Declaration).

Steven F. Hodkinson
Printed Name of Person Signing

Vice President, Treasurer
Official Title

Steven F. Hodkinson
Signature

01/23/01
Date Signed

California Environmental Protection Agency

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

RECORD OF COMMUNICATION	☑ PHONE CALL ☐ CONFERENCE ☐ DISCUSSION ☐ OTHER (specify) ☐ FIELD TRIP	
TO: STEVE CHAMBERS tel	FROM: STEVEN HARIRI tel	DATE: 1/18/01
SUBJECT: WORKPLAN FOR SITE		FILE NO: 744

Summary of Conversation:

2PM REVIEWED 30 NOV 2000 REPORT FOR SITE CONDITIONS
LOCAL HYDROGEOLOGY AND OFFSITE GW PRODUCTION/AND
WORKPLAN FOR GW REMEDIATION

RPT DEFICIENTS
- NEED GW INVESTIGATION FOR COMPLETE DELINEATION
- GW MONITORING RPTS MUST INCLUDE ISOCONCENTRATION MAPS
- LAB REPORTS AND MDL MEET REQ OF RWQCB
- FILL OUT AND SEND ABCEL FORM

SET UP MEETING TO DISCUSS SITE STATUS

Conclusions, Action taken or required:

Information copies to:

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

RECORD OF COMMUNICATION	☑ PHONE CALL ☐ CONFERENCE ☐ DISCUSSION ☐ OTHER (specify) ☐ FIELD TRIP	
TO: STEVEN CHAMBERS tel	FROM: tel STEVEN	DATE: 11/16/00
SUBJECT: EXTENSION		FILE NO: 744

Summary of Conversation:

EXTENSION TO NOV 30, 2000 FOR GW WORKPLAN

Conclusions, Action taken or required:

Information copies to:

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

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

Gray Davis
Governor

SSH

September 18, 2000

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

QUARTERLY GROUNDWATER MONITORING REPORT – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Stanesa:

The Los Angeles Regional Water Quality Control Board (Regional Board) has received and reviewed the Quarterly Progress Report (report), dated May 15, 2000. Based on review of the information submitted, the Regional Board has the following comments:

1. Submit a work plan for additional groundwater investigation to fully delineate groundwater contamination.

2. Please provide a map showing the proposed locations for additional monitoring wells, tables depicting the analytical methodology, text explaining the rationale for the number and location of additional wells. Direct push technology may be used to delineate groundwater contamination prior to well installation.

3. The Regional Board must be contacted at least 10 days prior to the start of any fieldwork.

4. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.

5. Monitoring well construction and development must comply with the requirements presented in the California Department of Water Resources' "California Well Standards" Bulletin 74-90.

6. A California licensed land surveyor must survey all groundwater monitoring wells to a County maintained benchmark. The survey report, signed by the licensee, shall be included in the assessment report.

7. Future quarterly groundwater monitoring reports must include groundwater contours depicting groundwater flow direction and gradient information. Also, include a dissolved phase contaminant isoconcentration contour map for each constituent.

8. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 *Interim Site Assessment & Cleanup Guidebook*, Appendices B and C.

9. We are enclosing the following requirements for your information. All field activities shall comply with these requirements:

   - General Requirements for Subsurface Investigation
   - Requirements for Groundwater Investigation

10. Pursuant to State Water Resources Control Board Resolution No. 92-49, under Water Code Section 13304, all fieldwork related to well installation must be conducted by, or under the direct responsible supervision of, a registered geologist or licensed civil engineer. All technical documents submitted to the LARWQCB must be reviewed and signed and/or stamped by a California registered geologist, a California registered certified specialty geologist, or a California registered civil engineer with at least five years hydrogeologic experience.

11. The California Business and Professions Code Sections 6735, 7835, and 7835.1 require that engineering and geologic evaluations and judgements be performed by or under the direction of registered professionals. Therefore, all work must be performed by or under the direction of a registered geologist or registered civil engineer. A statement is required in the report that the registered professional in responsible charge actually supervised or personally conducted all the work associated with the project.

12. Pursuant to changes to the California Health and Safety Code (Section 25299.37.2) and Division 7 of the Porter Cologne Water Quality Control Act under AB 681, the Regional Board is required to notify all current fee title holders for the subject site of the planned action. As the identified current primary or active responsible party for corrective action and/or cleanup at the site, we are requesting that you provide us with a complete mailing list of all record fee title holders for the subject site. Therefore, please provide the name, mailing address, and telephone number for all record fee title holders for the subject site with a copy of the county record of current ownership, available from the County Recorder's Office, or complete the attached Certification Declaration form and submit it to our office. Please submit the required information by the due date of the workplan.

13. You are required to submit information to show the depth to the drinking water aquifer, and a scaled map showing the locations of the production wells and surface water bodies within a one mile radius of the site. The production well information must include the following: the well owner, the well identification number, well construction detail, and the status of the well. In addition, you are required to discuss the local geologic formations and lithology, which will allow this Regional Board to assess the vulnerability of the nearby drinking water supply wells, and determine any potential contaminant migration pathways to deeper groundwater zones. Please include this information along with your upcoming workplan.

The groundwater investigation workplan must be provided to the Regional Board no later than **November 17, 2000**. In the event that groundwater contamination is not fully delineated during this phase of work, a workplan for a complete groundwater investigation will be required. Please call me at (213) 576-6745, if you have any further questions.

Sincerely,

S. Steven Hariri, P.E.
Associate Water Resources Control Engineer
Site Cleanup Unit I

Enclosures:

1. General Requirements for Subsurface Investigation
2. Requirements for Groundwater Investigation
3. Certification Declaration form

cc: Steven Miller, Erler & Kalinowski, Inc.

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

RECORD OF COMMUNICATION	☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (specify)	
TO: STEVEN HARIRI tel	FROM: STEVE CHAMBERS tel	DATE: 9/11/00
SUBJECT: STATUS		FILE NO: 744

Summary of Conversation:

1:35 • COMMENT LETTER SENT OUT FOR GW INV. WKPLN DUE 11/9/00.

• PLEASE ADDRESS COMMENTS.

Conclusions, Action taken or required:

Information copies to:

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

RECORD OF COMMUNICATION	☑ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (specify)	
TO: DAWN STAUFFER tel ECOLOGY & ENV (415) 981-2811	FROM: STEVEN HARIRI tel	DATE: 9/5/00
SUBJECT: SITE STATUS		FILE NO: 744

Summary of Conversation:

2:00PM SITE SCREENING FOR EPA FOR PRIORITIZING SITE TO SEE IF EPA NEEDS TO GET INVOLVED / NEED FOR FILING

SUPERVISOR TOM GINDLER

GW MONITORING SINCE FEB 98
VAPOR EXTRACTION SINCE MAR 2000
LETTER TO BE SENT OUT SOON TO FULLY DELINEATE GW CONTAMINATION LEADING TO CORRECTIVE ACTION PLAN

Conclusions, Action taken or required:

Information copies to:

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

RECORD OF COMMUNICATION	☑ PHONE CALL ☐ CONFERENCE ☐ DISCUSSION ☐ OTHER (specify) ☐ FIELD TRIP	
TO: DAWN STAUFFER tel ECOLOGY & ENV. (415) 981-2811	FROM: STEVEN HARIRI tel	DATE: 9/5/00
SUBJECT: SITE STATUS		FILE NO: 744

Summary of Conversation:

2:00PM SITE SCREENING FOR EPA FOR PRIORITIZING SITE TO SEE IF EPA NEEDS TO GET INVOLVED / NEED FOR FUNG

SUPERVISOR TOM GINOLEO

GW MONITORING SINCE FEB 98
VAPOR EXTRACTION SINCE MAR 2000
LETTER TO BE SENT OUT SOON TO FULLY DELINEATE GW CONTAMINATION LEADING TO CORRECTIVE ACTION PLAN

Conclusions, Action taken or required:

Information copies to:

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

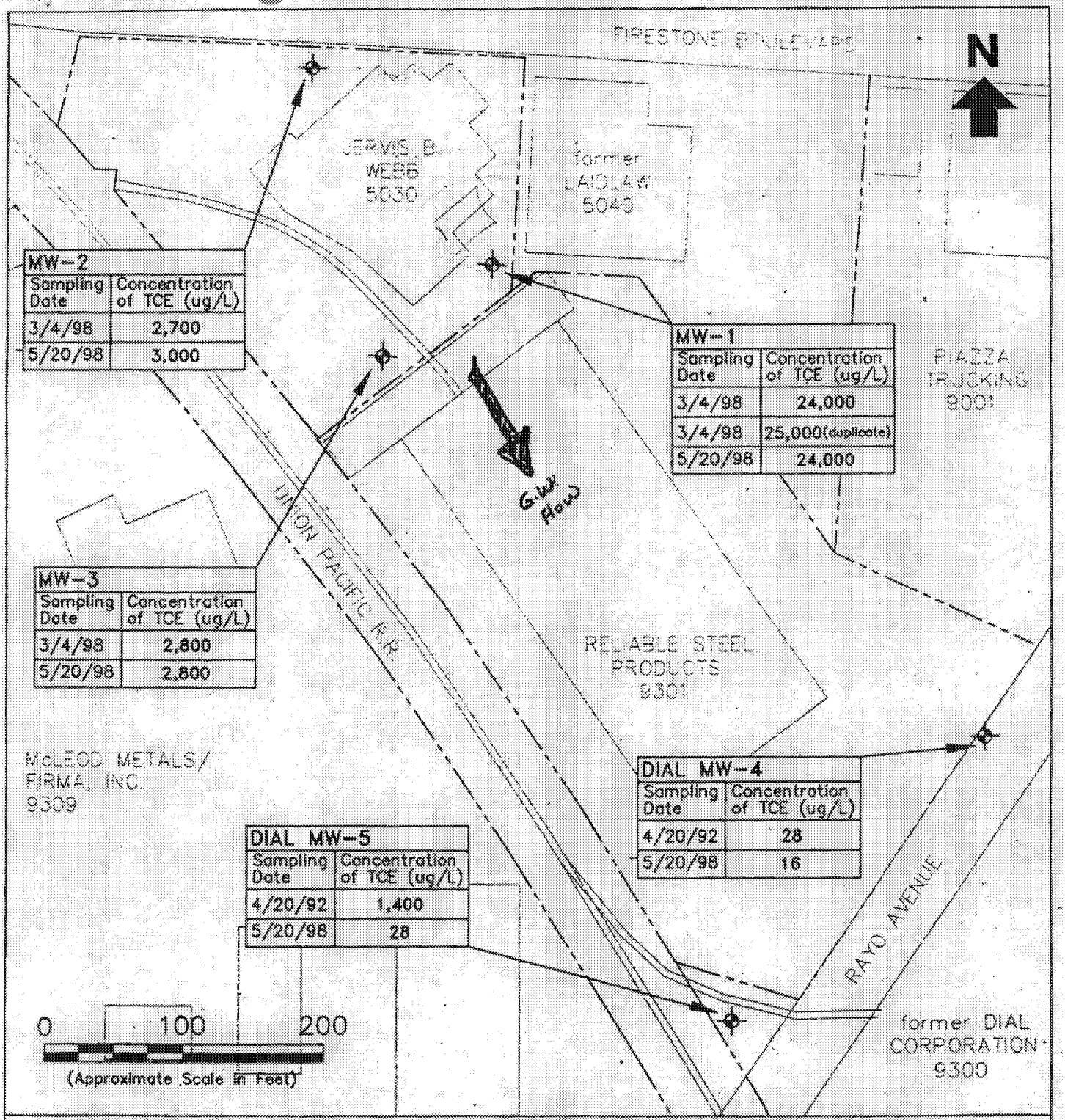
RECORD OF COMMUNICATION	☑ PHONE CALL ☐ CONFERENCE ☐ DISCUSSION ☐ OTHER (specify) ☐ FIELD TRIP	
TO: STEVEN CHAMBERS tel	FROM: STEVEN HAGMI tel	DATE: 7/11/00
SUBJECT: QUARTERLY MONITORING REPORTS		FILE NO: 744

Summary of Conversation:

9:25 ISOCON MAPS FOR GW
SOIL SVE FLOW RATES IN SCFM
SDMP REPORTS
WILL ADDRESS GW NEXT RPT (SEPT)

Conclusions, Action taken or required:

Information copies to:



MW-2	
Sampling Date	Concentration of TCE (ug/L)
3/4/98	2,700
5/20/98	3,000

MW-1	
Sampling Date	Concentration of TCE (ug/L)
3/4/98	24,000
3/4/98	25,000(duplicate)
5/20/98	24,000

MW-3	
Sampling Date	Concentration of TCE (ug/L)
3/4/98	2,800
5/20/98	2,800

DIAL MW-4	
Sampling Date	Concentration of TCE (ug/L)
4/20/92	28
5/20/98	16

DIAL MW-5	
Sampling Date	Concentration of TCE (ug/L)
4/20/92	1,400
5/20/98	28

LEGEND

Groundwater Monitoring Well

Property Line/Boundary

Depth to G.w. ≈ 44 ft. bgs.

Erler & Kalinowski, Inc.

Concentrations of Trichloroethene in Groundwater Samples

Jervis B. Webb Company
South Gate, California
June 1998
EKI 961025.02
Figure 2

Notes:

1. All locations are approximate.
2. Groundwater sampling at wells MW1 through MW3 performed by Erler & Kalinowski on 4 March and 20 May 1998. Groundwater Groundwater sampling at Dial Corporation wells MW-4 and MW-5 perfo[illegible]ed [illegible]mcon on 20 April 1992 and Erler & Kalinowski [illegible] 1998.

TCE = trichloroethene ug/L = micrograms per liter

TABLE 2

Soil Analytical Results for VOCs

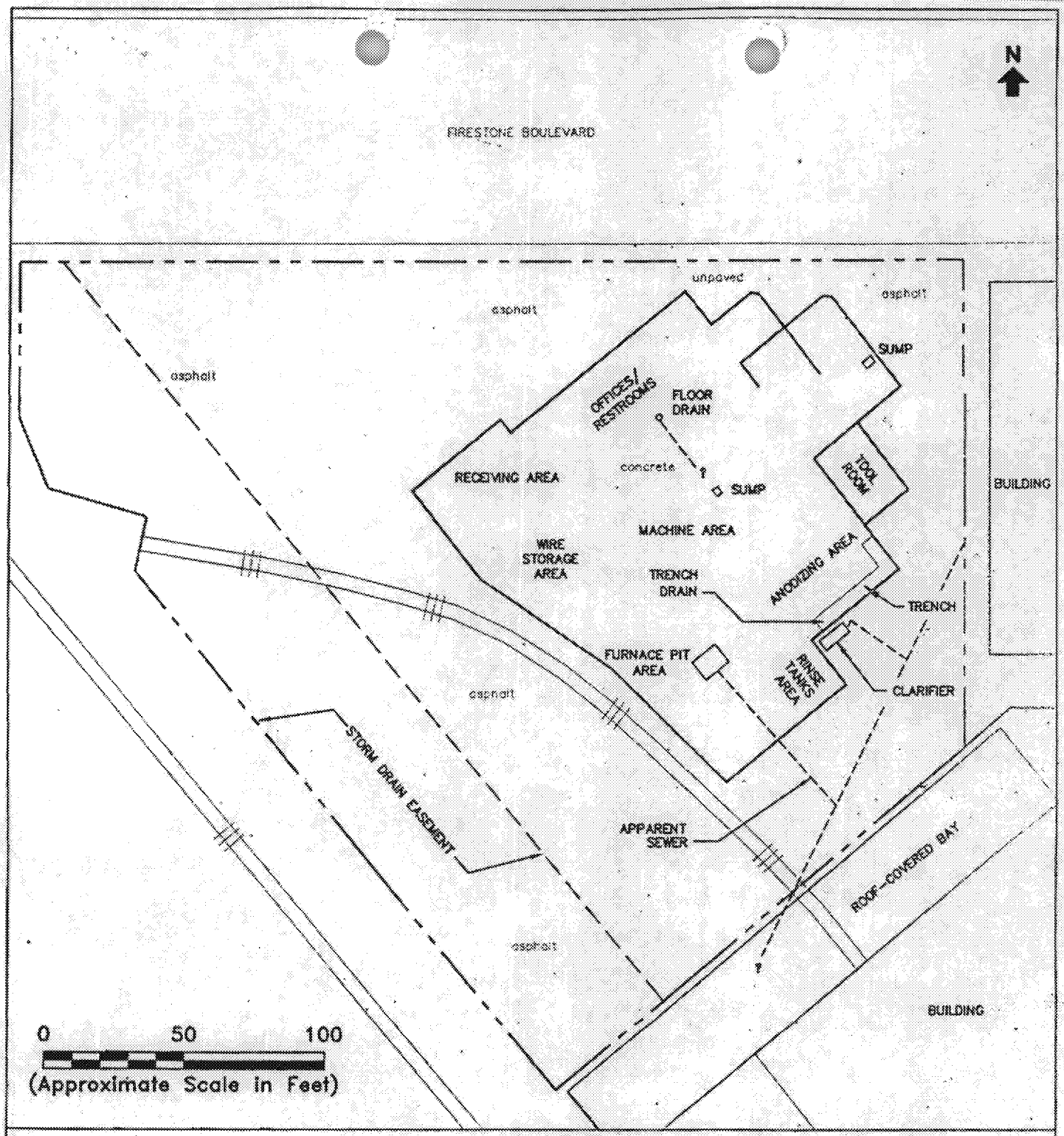
Phase II Groundwater Investigation Report

5030 Firestone Boulevard, South Gate, California

Boring Number	Sample Number	Depth (ft. bgs)	Concentration PCE (ug/kg)	TCE (ug/kg)
MW-1	MW1-10.5	10.5	21	18
MW-1	MW1-20.5	20.5	23	62
MW-1	MW1-30.5	30.5	11	60
MW-2	MW2-10.5	10.5	<5	<5
MW-2	MW2-20.5	20.5	<5	<5
MW-2	MW2-30.5	30.5	<5	<5
MW-3	MW3-11	11	<5	<5
MW-3	MW3-20.5	20.5	<5	<5
MW-3	MW3-30.5	30.5	<5	<5

Notes:

1. Abbreviations: PCE = tetrachloroethene
   TCE = trichloroethene
   ft bgs = feet beneath ground surface
   ug/kg = micrograms per kilogram
2. Chemical analyses were performed by Orange Coast Analytical, Inc. using EPA Method 8010.
3. Samples from borings MW-1, MW-2, and MW-3 collected on 24 and 25 February 1998.
4. Sample depth is indicated in the sample name. Depth is indicated by the last number separated by a hyphen in each sample description. (i.e. sample MW1-10.5 collected at 10.5 ft bgs.



LEGEND

- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR
- SEWER (not confirmed)
- STORM DRAIN EASEMENT (not confirmed)

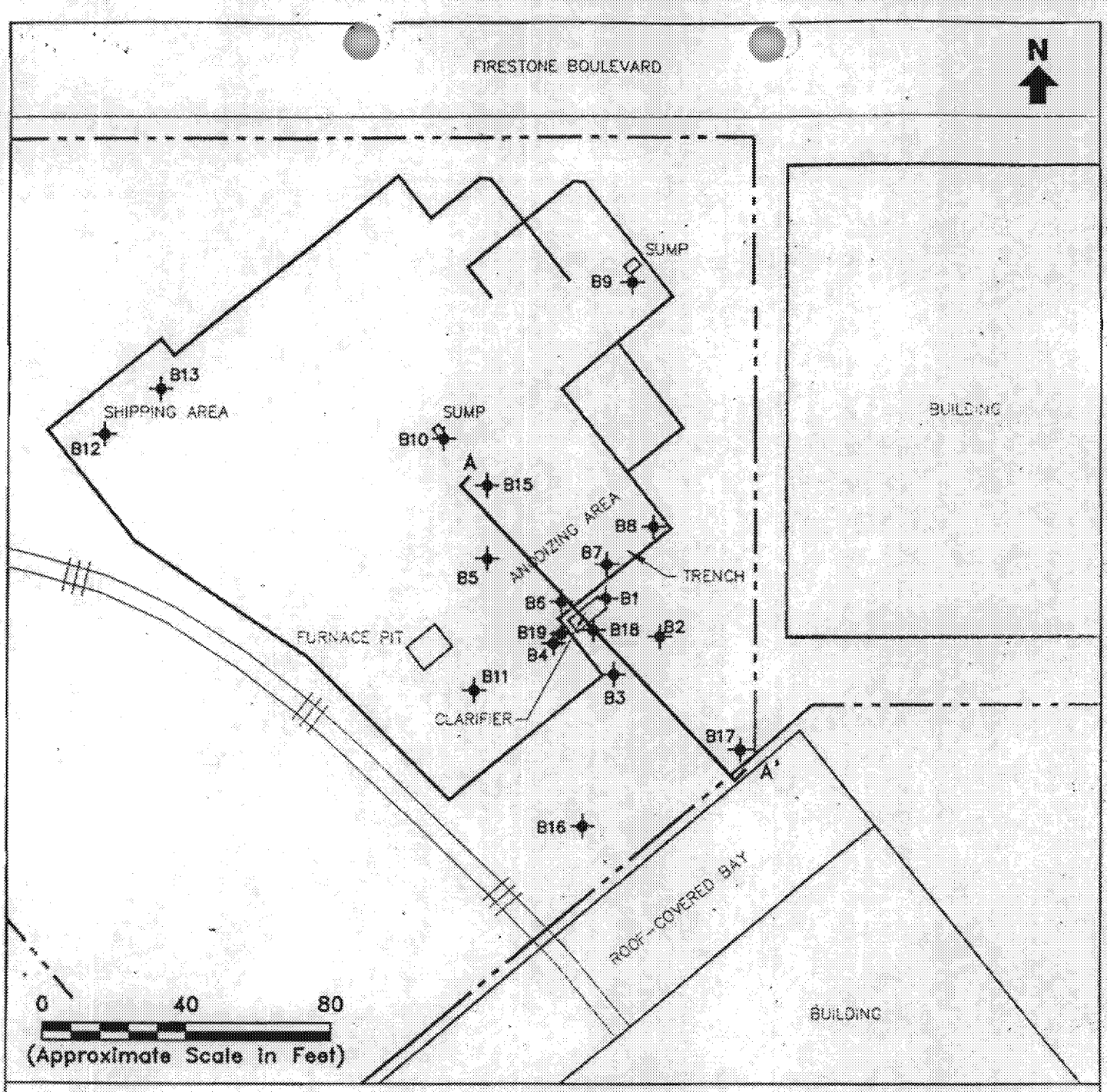
Notes:

1. All locations are approximate.

Erler & Kalinowski, Inc.

Subject Property Features
5030 Firestone Boulevard

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02
Figure 2



LEGEND

- LOCATION OF SOIL BORING
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Erler & Kalinowski, Inc.

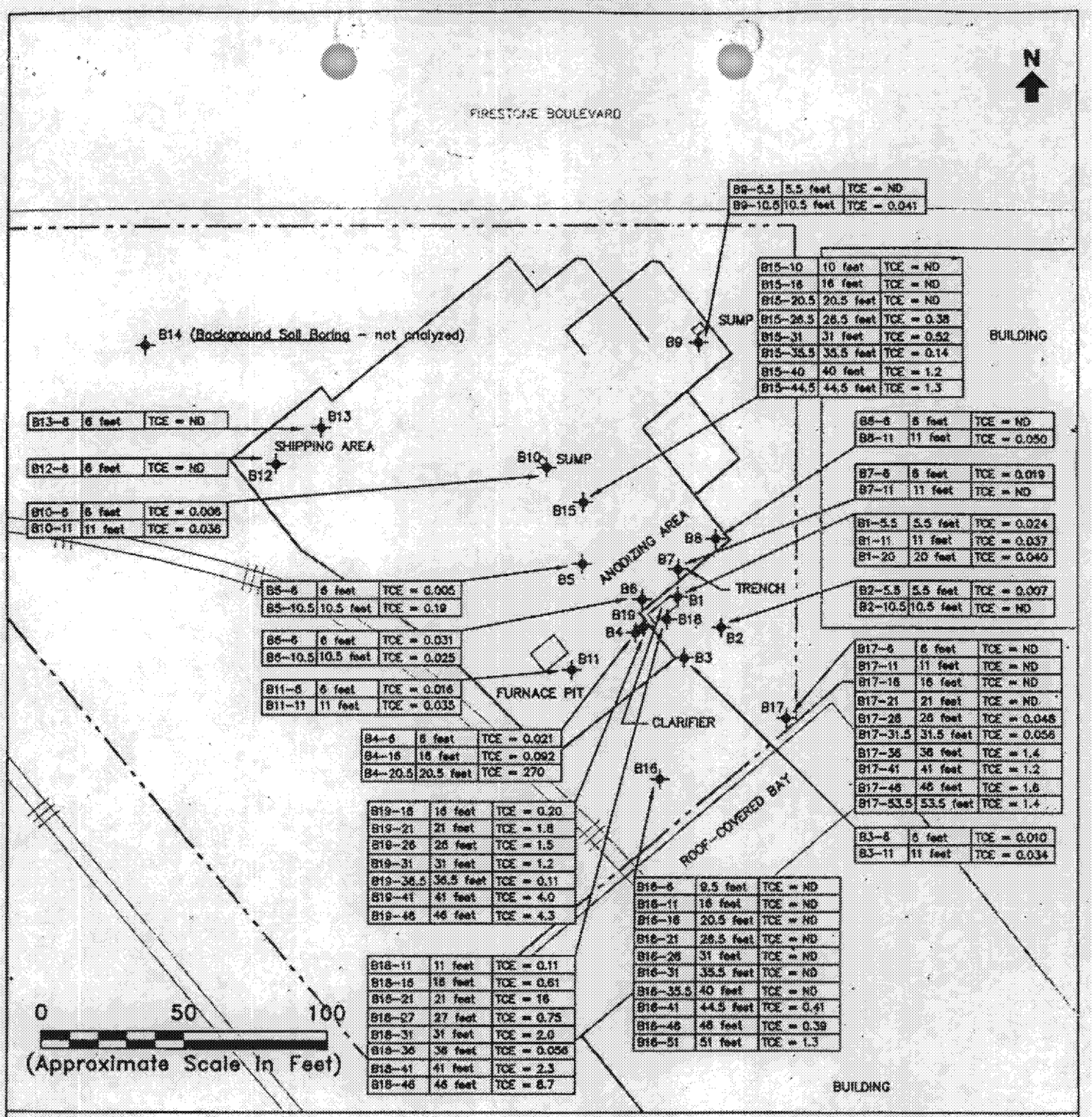
Plan Map Showing Deep Soil Cross Section Through Clarifier Area

Jervis B. Webb Co.
South Gate, CA
February 1998
EKI 961025.02

Figure 9

Notes:

1. [illegible] oximate.



LEGEND

- LOCATION OF SOIL BORING
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

1. All locations are approximate.
2. Soil boring B4 installed at approximately 15 degrees angle from vertical in the direction of the base of the clarifier. Boring terminated beneath the clarifier.
3. See laboratory report for results of additional analyses.
4. Concentrations of volatile organic compounds ("VOCs") reported in units of micrograms per kilogram. Concentrations shown in units of milligrams per kilogram ("mg/kg"). "ND" indicates non-detection above method detection limits. Some concentrations rounded to nearest 0.001 mg/kg.

Erler & Kalinowski, Inc.

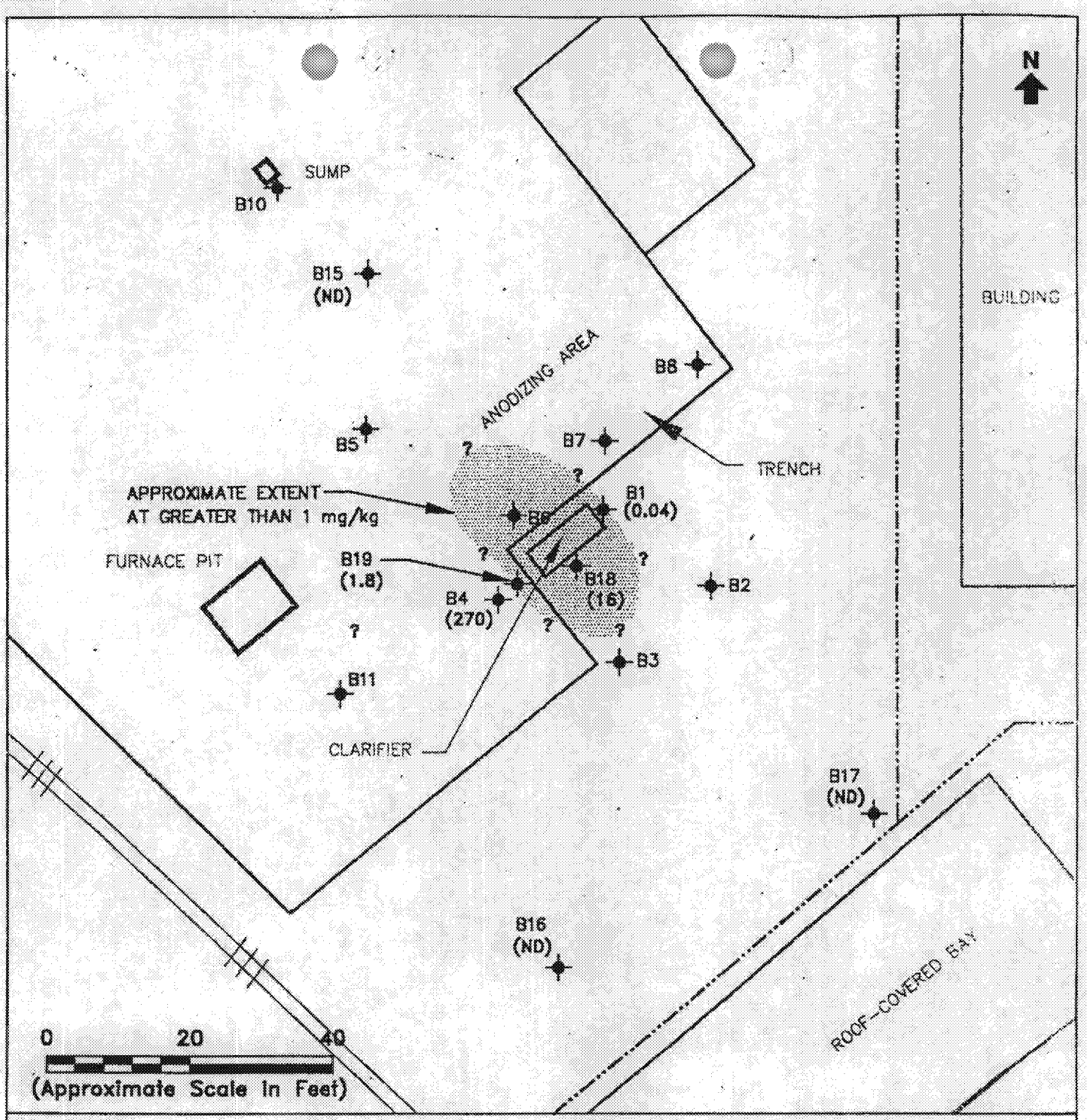
Concentrations of TCE Detected in Soil

mg/kg

Jervis B. Webb Company
South Gate, CA

February 1998
EKI 961025.02

Figure 7



LEGEND

- LOCATION OF SOIL BORING (Not all borings sampled to 20 feet)
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

1. All locations are approximate.
2. Soil boring B4 installed at approximately 15 degrees angle from vertical in the direction of the base of the clarifier. The detected 270 mg/kg was in a sample from below the clarifier at 20 feet below ground surface.
3. See laboratory report for results of additional analyses.
4. Concentrations of volatile organic compounds ("VOCs") shown in units of milligrams per kilogram ("mg/kg"). "ND" indicates non-detection above method detection limits. Some concentrations rounded to nearest 0.001 mg/kg.

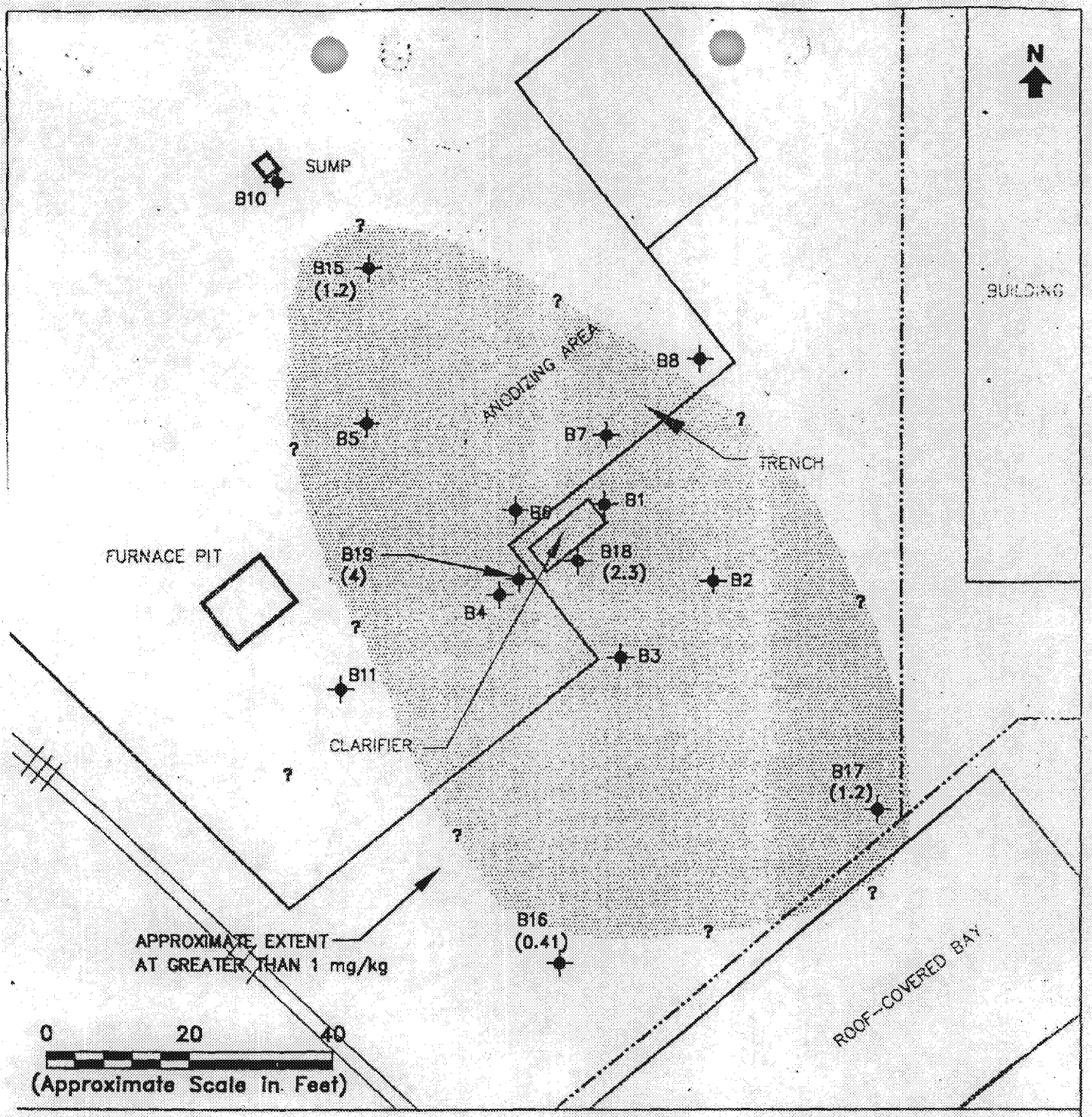
Erler & Kalinowski, Inc.

Approximate Lateral Extent of TCE Detected in Soil at Approximately 20 Feet Below Ground Surface

Jervis B. Webb Company
South Gate, CA

February 1998
EKI 961025.02

Figure 11



LEGEND

- LOCATION OF SOIL BORING (Not all borings sampled to 20 feet)
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

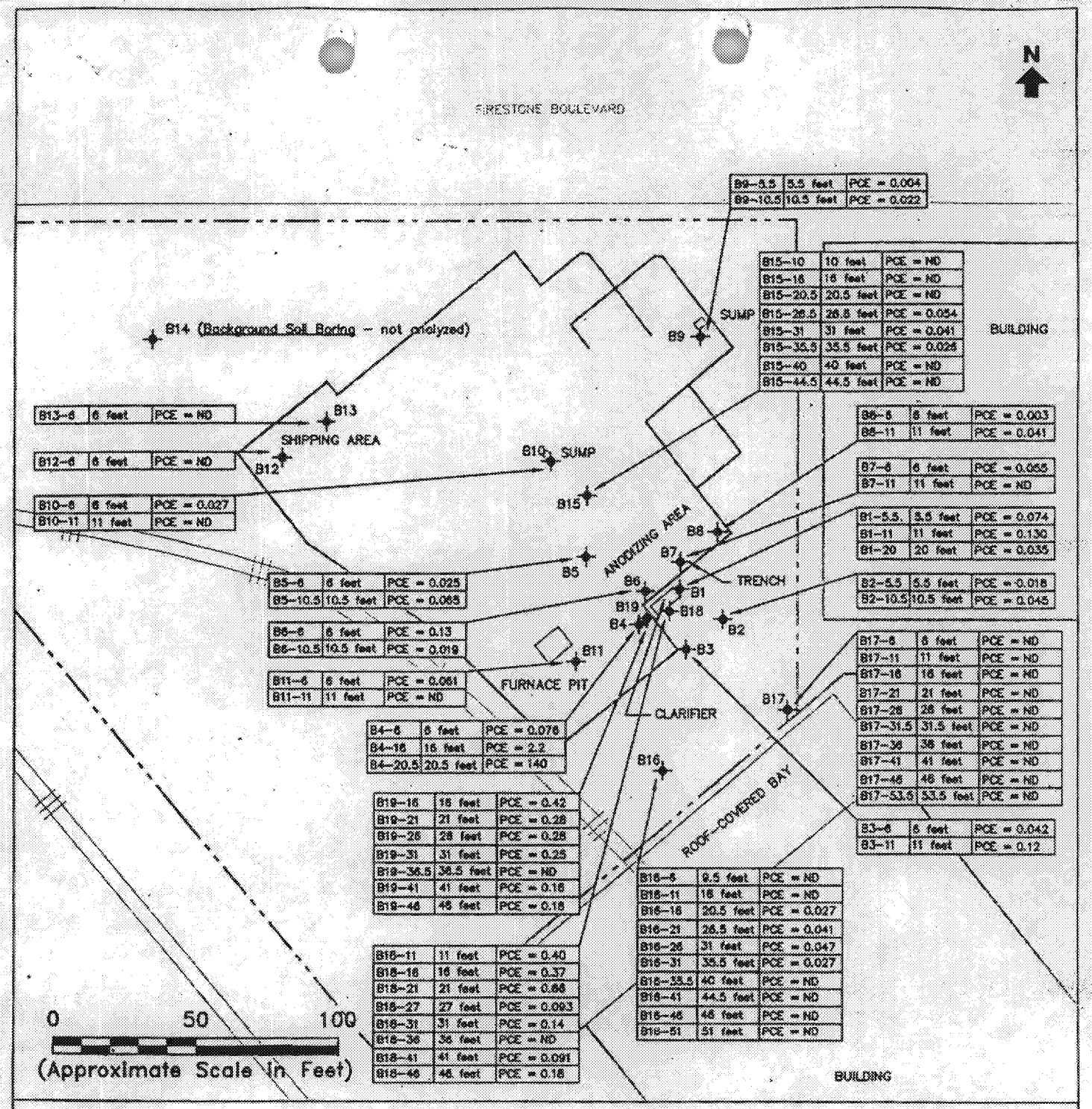
1. All locations are approximate.
2. Soil boring B4 installed at approximately 15 degrees angle from vertical in the direction of the base of the clarifier.
3. See laboratory report for results of additional analyses.
4. Concentrations of volatile organic compounds ("VOCs") shown in units of milligrams per kilogram ("mg/kg"). "ND" indicates non-detection above method detection limits. Some concentrations rounded to nearest 0.001 mg/kg.

Erler & Kalinowski, Inc.

Approximate Lateral Extent of TCE Detected in Soil at Approximately 40 Feet Below Ground Surface

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02

Figure 12



LEGEND

- LOCATION OF SOIL BORING
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

1. All locations are approximate.
2. Soil boring B4 installed at approximately 15 degrees angle from vertical in the direction of the base of the clarifier. Boring terminated beneath the clarifier.
3. See laboratory report for results of additional analyses.
4. Concentrations of volatile organic compounds ("VOCs") reported in units of micrograms per kilogram. Concentrations shown in units of milligrams per kilogram ("mg/kg"). "ND" indicates non-detection above method detection limits. Some concentrations rounded to nearest 0.001 mg/kg.

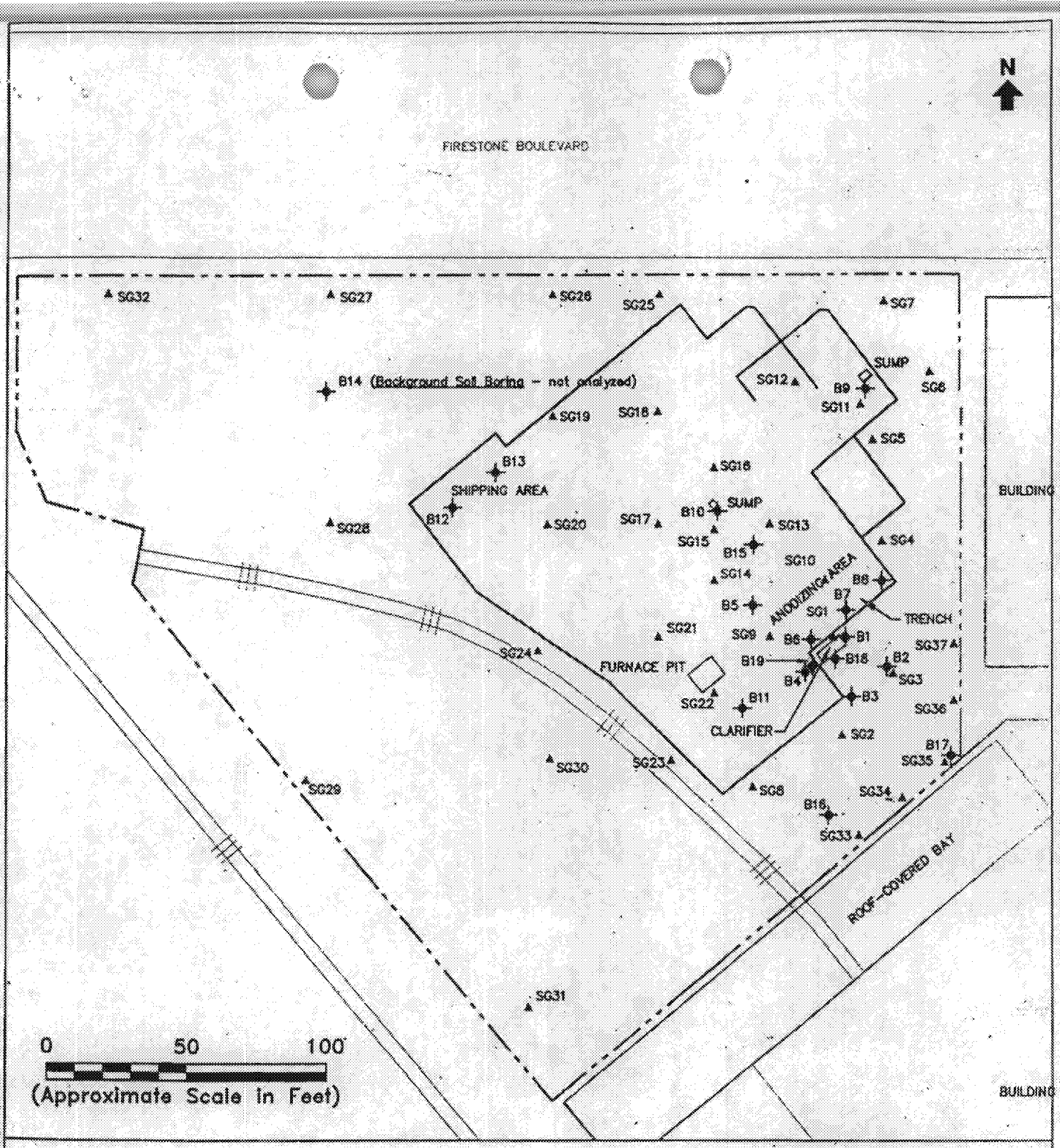
Erler & Kalinowski, Inc.

Concentrations of PCE Detected in Soil

mg/kg

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02

Figure 3



LEGEND

- SOIL GAS SAMPLING LOCATION
- SOIL GAS SAMPLING LOCATION
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

1. All locations are approximate.

Erler & Kalinowski, Inc.

Locations of Soil and Soil Gas Sampling

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02

Figure 3

California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

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

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

June 30, 2000

Mr. Eli Stanesa
Jervis B. Webb Company
34375 W. Twelve Mile Rd.
Farmington Hills, MI 48331-5624

ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND CLEANUP (SLIC) COST RECOVERY PROGRAM – JERVIS WEBB CO. - 5030 FIRESTONE BOULEVARD, SOUTH GATE, SLIC NO. 744 (PCA# 2042J)

Dear Mr. Stanesa:

Section 13304 of the California Water Code (Porter Cologne) allows the Regional Board to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at this site in accordance with our letter dated February 2, 1998. In compliance with AB 2507, this letter is being sent to provide you with the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.
2. A statement of the expected outcome of that work.
3. The billing rates for all individuals and classes of employees expected to engage in the work.
4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Performed

Board staff estimate that the following work will be performed during the fiscal year 2000/2001:

- Review groundwater monitoring reports, remediation reports, other project technical reports that may be necessary, and other information as appropriate.
- Provide written correspondences and telephone communications with Jervis B. Webb Company, its representatives and interested third parties.
- Conduct internal communications (i.e. meetings, memos, site status updates, program updates, etc.) regarding the project.
- Meet with Jervis B. Webb Company and its representatives.
- Conduct site inspections and/or collect confirmation samples as appropriate.

Expected Outcome of Work

The followings are the expected outcome of work that will be performed during fiscal year 2000/2001:

- Track progress of remediation.
- Provide written comments on reports to be submitted as appropriate.
- Conduct meetings and/or additional site inspections to facilitate the completion of the project.

Billing Rates

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is approximately $70.00 per hour.

Estimation of Expected Charges

Board staff expects to charge about 110 hours of work related to this site during fiscal year 2000/2001 (July 1, 2000 to June 30, 2001). Based on the average billing rate of $70.00 per hour, the estimated billing charge for this site during fiscal year 2000/2001 is about $7,700.

If you have any questions, please contact Steven Hariri at (213) 576-6745.

Sincerely,

Dennis A. Dickerson
Executive Officer
Los Angeles Regional Water Quality Control Board

Enclosure: Billing Rate Description

Cc: Donna Vercruyssen, SWRCB - CWP

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

RECORD OF COMMUNICATION	☑ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE ☐ OTHER (specify)	
TO: STEVEN CHAMBERS tel	FROM: STEVEN HARRI tel	DATE: 7/11/00
SUBJECT: QUARTERLY MONITORING REPORTS		FILE NO: 744

Summary of Conversation:

9:25 ISOCON MAPS FOR GW
SOIL SVE FLOW RATES IN SCFM
SAMP REPORTS
WILL ADDRESS GW NEXT RPT (SEPT)

Conclusions, Action taken or required:

Information copies to:

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

Santa Monica Business Park
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

28 June 1999

Ms. Ana Veloz-Townsend
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Groundwater Monitoring and Sampling Plan
5030 Firestone Boulevard, South Gate, California
(RWQCB SLIC File No. 744; EKI 961025.02)

Dear Ms. Veloz-Townsend:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to submit this project schedule for groundwater monitoring at the Jervis B. Webb Company property located at 5030 Firestone Boulevard in South Gate ("Site"). This schedule has been prepared in response to the request for submittal of a quarterly groundwater monitoring and sampling plan as set forth in the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") letter to Webb dated 18 May 1999. The proposed groundwater monitoring activities are described in EKI's *Project Tasks, Schedule, and Work Plan for Additional Groundwater Investigation And Quarterly Groundwater Monitoring at the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate, California*, dated 29 September 1998. In our recent telephone conversation, you indicated that a schedule for the activities described in this report would satisfy the RWQCB's requirement.

During the remainder of 1999, EKI proposes to measure the depth to groundwater at the five existing groundwater monitoring wells on a monthly basis. EKI proposes to sample each of the five groundwater monitoring wells once each quarter. The third quarter (July through September) groundwater sampling is planned for August and the fourth quarter (October through December) groundwater sampling is planned for November of 1999. EKI proposes to submit reports detailing these activities approximately one month after the end of each quarter. The next quarterly report will be submitted by the end of July for groundwater monitoring activities completed from April to June 1999.

Please contact us if you have any comments or questions.

Very truly yours,
ERLER & KALINOWSKI, INC.

Steven G. Miller, P.E.
(CE, Cert. 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

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Gray Davis
Governor

May 18, 1999

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE, SOIL REMEDIATION ACTIVITIES (SLIC NO. 744)

Dear Mr. Stanesa:

We have received and reviewed your consultant's *"Work Plan for Clarifier Removal and Soil Remediation by Soil Vapor Extraction"* dated April 14, 1999, submitted for the above-referenced site. The report indicates that two distinct soil vadose zones, a shallow zone (approximately 10 to 25 feet bgs) and a deeper zone (approximately 25 to 45 feet bgs), separated by a 1 to 5 foot clay layer at approximately 25 feet bgs exist underlying the subject site. The report also indicates that both zones are impacted by volatile organic compounds (VOC), primarily TCE and PCE, and proposes to remediate the contaminated soil through the use of a soil vapor extraction system (SVE). Your consultant proposes to install three SVE wells and two vacuum monitoring points in the shallow zone and one SVE well and two vacuum monitoring points in the deeper zone. We have reviewed the subject submittal and you are authorized to proceed with the soil remediation activities proposed subject to the following modifications:

1. Upon completion of the pilot testing activities, please provide us with the actual radius of influence data for the SVE wells and revise the site map accordingly. Additional soil vapor extraction wells in both the shallow and deeper zones may need to be installed in order to capture the entire on and off-site soil contamination plume.

2. Your consultant indicates that soil gas samples will be collected immediately after system startup and following the second, fourth, fifth, and sixth months of SVE operation. Soil gas samples should also be collect prior to system startup in order to collect baseline soil gas information.

Regarding the groundwater, as previously indicated in our letter dated September 4, 1998, a quarterly groundwater sampling and monitoring program must be developed for all monitoring wells located at the subject site. A quarterly groundwater monitoring and sampling plan shall be submitted to this Regional Board by **June 28, 1999**. We also recommend that you consider conducting groundwater remediation activities.

If you have any questions regarding this matter, please contact me at (213) 576-6738.

Sincerely,

ANA TOWNSEND
Sanitary Engineer Associate
Site Cleanup Unit

cc: Steven Miller, Erler & Kalinowski, Inc.

= 744 AVT

Erler & Kalinowski, Inc.
Consulting Engineers and Scientists

14 April 1999

Ms. Ana Veloz-Townsend
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

Subject: Work Plan for Clarifier Removal and Soil Remediation by Soil Vapor Extraction at the Jervis B. Webb Company Property Located at 5030 Firestone Boulevard, South Gate, California
(RWQCB SLIC File No. 744; EKI 961025.03)

Dear Ms. Veloz-Townsend:

Erler & Kalinowski, Inc. ("EKI") is pleased to submit this *Work Plan for Clarifier Removal and Soil Remediation by Soil Vapor Extraction* for the Jervis B. Webb Company of California ("Webb") property located at 5030 Firestone Boulevard, South Gate, California ("Subject Property", see Figure 1). Plans for clarifier removal and the basis and conceptual design for a soil vapor extraction ("SVE") system to remove volatile organic compounds ("VOCs") from soil at the Subject Property are described herein.

BACKGROUND

Halogenated VOCs have been detected in soil, soil gas, and groundwater at the Subject Property. Results from sampling and analyses are reported in:

- *Phase II Soil Investigation Report, Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, Erler & Kalinowski, Inc., 18 February 1998 ("Phase II Soil Report"); and,

- *Phase II Groundwater Investigation Report, Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, Erler & Kalinowski, Inc., 30 June 1998 ("Phase II Groundwater Report").

- *Additional Groundwater Investigation and Quarterly Monitoring Report for October to December 1998 Related to the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate, California*, Erler & Kalinowski, Inc., 13 January 1999 ("Additional Groundwater Investigation and Quarterly Monitoring Report")

The VOCs that have been detected the most frequently and at the highest concentrations in soil, soil gas, and groundwater samples collected at the Subject Property are trichloroethene ("TCE") and tetrachloroethene ("PCE"). Other VOCs that have been detected in soil, soil gas, or groundwater at the Subject Property include acetone, benzene, chloroform, 1,1-dichloroethane ("1,1-DCA"), 1,2-dichloroethane ("1,2-DCA"), 1,1-dichloroethene ("1,1-DCE"), cis-1,2-dichloroethene ("cis-1,2-DCE"), trans-1,2-dichloroethene ("trans-1,2-DCE"), 1,1-dichloroethene ("1,1-DCE"), 1,1-dichloroethane ("1,1-DCA"), methyl ethyl ketone ("MEK"), 1,1,1-trichloroethane ("1,1,1-TCA"), dichlorodifluoromethane ("CFC-12"), toluene, trichlorofluoromethane ("CFC-11"), and xylenes. As discussed in the reports listed above, TCE and PCE are considered to be the primary chemicals of concern in soil at the Subject Property.

Vadose Zone Setting

Locations of soil borings at the Subject Property and a geologic cross section are shown on Figures 2 and 3, respectively. Groundwater beneath the Subject Property is first encountered at approximately 45 feet below ground surface ("ft bgs"). A clay layer about 1 to 5 feet thick is located approximately 25 ft bgs, and may act as a barrier to vertical vapor migration between the unsaturated soil above and below the clay layer. The unsaturated soil above the clay layer is referred to herein as the "shallow vadose zone", and the unsaturated soil beneath the clay layer is referred to herein as the "deep vadose zone."

The shallow vadose zone has two distinct units, including a silty-sand zone extending from near ground surface to approximately 10 ft bgs, and a sandy-silt/clayey-silt zone extending from approximately 10 to 25 ft bgs. The highest VOC concentrations reported in soil at the Site have been in soil samples collected from the sandy-silt/clayey-silt zone, i.e., at 20 ft bgs in soil boring B4. Because the sandy-silt/clayey-silt zone will likely have somewhat lower permeability than the overlying silty-sand zone, SVE wells will be screened only in the lower permeability sandy-silt/clayey-silt zone to force airflow through the soil where the highest VOC concentrations in soil have been detected. Based on soil air permeability data obtained during soil investigations (see the Phase II Soil Report), there is some uncertainty about whether adequate air flow can be achieved for operation of a SVE system in the shallow vadose zone. However, based on experience at other sites, EKI believes that it is likely that adequate airflow can be achieved. Webb may initially install and test one SVE well, and if adequate air flow is demonstrated, then the remaining wells will be installed.

The deep vadose zone includes unsaturated soil beneath the clay layer found at approximately 25 ft bgs, and extends vertically from approximately 25 ft bgs to the groundwater table at approximately 45 ft bgs. In the middle of this zone is a 1 to 5 foot thick sand zone, overlain and underlain by lower permeability silty-sand and sandy-silt zones (see Figure 3).

Soil Data

Concentrations of TCE and PCE detected in soil samples collected at the Subject Property are listed in Table 1. Concentrations of PCE or TCE have been detected at concentrations above

10 milligrams per kilogram ("mg/kg") in only two soil samples collected at the Subject Property. TCE was detected at 270 mg/kg and PCE was detected at 140 mg/kg in a soil sample collected at 20.5 ft bgs in soil boring B4. TCE was also detected at 16 mg/kg in a soil sample collected at 21 ft bgs in soil boring B18. These sampling locations are beneath the clarifier at the Subject Property, a suspected historical release point for VOCs.

In the shallow vadose zone (i.e., above 25 ft bgs), TCE and PCE have been detected above 1 mg/kg only in soil samples collected from borings B4, B18, and B19. These soil borings are located within a few feet of each other and the clarifier (see Figure 2). These data suggest a limited lateral extent of elevated VOC concentrations in shallow soil at the Site.

In the deep vadose zone (i.e., below 25 ft bgs) TCE appears to be more broadly distributed in soil, but at concentrations substantially lower than the highest concentration detected in soil samples from the shallow vadose zone (see above). The highest TCE concentration detected in soil samples collected from the deep vadose zone is 8.7 mg/kg detected in a soil sample collected from 45 ft bgs in soil boring B18 (i.e., beneath the clarifier). TCE has been detected above 1 mg/kg in soil samples from below 25 ft bgs in each of the five soil borings that have been advanced into the deep vadose zone (i.e., borings B15, B16, B17, B18, and B19). The broader distribution of TCE in the deep vadose zone at concentrations near 1 mg/kg suggests that TCE may have migrated through groundwater and/or through the vapor phase to soil that was not directly impacted by a surface release of TCE.

Soil Gas Data

Soil gas samples were collected from approximately 5 ft bgs at several locations on the Subject Property and analyzed for VOCs. Results of the soil gas survey are summarized on Figures 4 and 5 for TCE and PCE, respectively (see the Phase II Soil Report for more details). The estimated area where TCE was present in soil gas above 10 micrograms per liter ("ug/l") extends from beneath the building to the eastern property line and is centered near the clarifier. The area where PCE was present in soil gas above 10 ug/l appears to be more limited, is located primarily beneath the building, and also encompasses the clarifier location.

Soil samples collected from the upper 11 feet of soil beneath the building and within the areas where TCE and PCE were detected in soil gas above 10 ug/l did not contain TCE or PCE above 1 mg/kg. Therefore, the TCE and PCE detected in soil gas beneath the building may be the result of lateral migration of vapor from the suspected release area near the clarifier adjacent to the building. This vapor migration would be most likely to occur in the relatively permeable silty-sand zone underlying the building from approximately 0 to 10 ft bgs. Alternatively, the TCE and PCE detected in soil gas may be the result of vertical migration of vapor from underlying soil that contains elevated concentrations of TCE and PCE.

SCOPE OF PROPOSED CLARIFIER REMOVAL

Webb proposes to engage Cornerstone Environmental Contractors, Inc. ("CEC") to remove the clarifier at the Subject Property. Clarifier removal is planned before installation of the SVE system. Prior to field work, CEC will obtain necessary permits, notify Dig Alert (at least 48 hours before start of the project), and survey the clarifier area for below ground and above ground utilities.

Currently, the clarifier is full of a sandy fill material. If practical, CEC will remove the fill sand from inside the clarifier before removal of the clarifier. The clarifier, fill sand, and any remaining contents will be excavated, removed and placed in appropriate containers for disposal off-site. EKI will observe and document the work and collect soil samples for chemical analyses, if needed.

Because SVE is planned for remediation of soil in this location, excavation of soil underlying the clarifier will not be performed unless obvious visual indications of contamination are observed. EKI anticipates that the final depth of the excavated area will be approximately 10 ft bgs. The clarifier is located adjacent to the Webb building, therefore, soil excavation, if any, will be very limited in extent to minimize the potential for adverse structural impact to the building. The excavation will be backfilled and compacted with imported fill material. We anticipate using a fill material less than 3" in diameter, with approximately 30-70% passing through a ¾"-sieve and 10-30% fines.

Sampling and chemical analysis of the contents of the clarifier and/or excavated soil will be performed as necessary to profile these waste materials for disposal at an off-site facility. Because sampling and chemical analyses of soil have already been performed in the clarifier area, no sampling of soil from under the clarifier after it is removed, or from the base of the excavation, is proposed.

SCOPE OF PROPOSED SVE SYSTEM

<u>Conceptual Scope of Proposed SVE System</u>

Based on the available data, the SVE system will be designed to remove TCE and PCE from two targeted treatment areas at the Subject Property, as follows.

1. The "Shallow Treatment Zone" will be the sandy-silt/clayey-silt zone from approximately 10 to 25 ft bgs, centered near the location where TCE was detected in soil at a concentration of 270 mg/kg (see Figure 6); and,

2. The "Deep Vadose Treatment Zone" will be from approximately 25 to 45 ft bgs, i.e., below the clay layer at approximately 25 ft bgs and centered near the location where TCE was detected in soil at concentrations up to 8.7 mg/kg.

The basis and conceptual scope of SVE treatment in each zone are described below.

Shallow Treatment Zone

The Shallow Treatment Zone will extend from approximately 10 ft bgs to the top of the clay layer that is found at approximately 25 ft bgs, and is centered around the clarifier that is a suspected VOC release point. Extraction well SVE-1 will be installed at the clarifier location (after the clarifier is removed) and screened from approximately 17 to 25 ft bgs. This well will specifically target the soil beneath the clarifier and in the vicinity of borings B4 and B19 where elevated TCE and PCE concentrations were detected in soil samples collected from the shallow vadose zone.

The screened interval for well SVE-1 will begin at 17 ft bgs to avoid the sand layer located at approximately 12 to 14 ft bgs (see Figure 3). By avoiding the sand layer, more airflow should be forced through the lower permeability sandy-silt/silty-clay zone where elevated concentrations of VOCs have been detected.

Although the Shallow Treatment Zone is targeting soil from 10 to 25 ft bgs, the overlying soils from 0 to 10 ft bgs are also expected to be treated as air flows through the overlying soil into the targeted zone.

Two potential SVE wells (SVE-2 and SVE-3) will also be installed in the Shallow Treatment Zone, as shown on Figure 6. These wells will be located outside the area where elevated VOC concentrations have been detected in soil, but will be within the areas where TCE or PCE have been detected at above 10 ug/l in soil gas samples. Wells SVE-2 and SVE-3 will serve as vacuum monitoring wells during initial startup and testing, i.e., to monitor the vacuum profile created by extraction from well SVE-1 alone. Data from initial SVE operations will be used to evaluate whether vapor extraction from these wells will result in significant VOC removal. Vapor will be extracted from these wells if they contribute significantly to VOC removal rates during SVE treatment. All SVE wells and vacuum monitoring points in the Shallow Treatment Zone will be constructed with nominal 2-inch diameter polyvinyl chloride ("PVC") well casings and screens.

A radius of influence of 20 feet or more is expected for each SVE well in the Shallow Treatment Zone, as illustrated for reference on Figure 6. The location for well SVE-2 is proposed 35 feet east of SVE-1, and the location for SVE-3 is proposed 30 feet northwest of SVE-1. Therefore, if SVE-2 and SVE-3 are used for vapor extraction, it is expected that the radius of influence for each well will overlap with the adjacent well(s). Further, it is expected that the combined lateral influence of the SVE wells will extend beyond the locations where TCE and PCE were detected above 1 mg/kg in soil samples and encompass most of the area where TCE and/or PCE was detected above 10 ug/l in soil gas samples. The actual radius of influence for well SVE-1 will be estimated after startup, as described below.

Two vacuum monitoring points will also be installed in the Shallow Treatment Zone. Vacuum monitoring points VMP-1 and VMP-2 will be installed 10 and 20 feet, respectively, east of well SVE-1. The monitoring points will be used to monitor the vacuum induced by extraction from well SVE-1, thereby providing an indication of the radial influence of SVE-1. Wells SVE-2 and SVE-3 will also be used for vacuum monitoring during startup and testing, as indicated above.

Deep Vadose Treatment Zone

The Deep Vadose Treatment Zone includes unsaturated soil beneath the clay layer found at approximately 25 ft bgs, and extends vertically from approximately 25 ft bgs to the groundwater table at approximately 45 ft bgs. At approximately in the middle of this zone is a 1 to 5 foot thick sand zone, overlain and underlain by lower permeability silty-sand and sandy-silt zones (see Figure 3).

Extraction well SVE-D1 will be installed near well SVE-1 in the location of the clarifier (after the clarifier is removed), and will be screened from approximately 30 to 40 ft bgs. It is expected that by extracting soil gas from a sandy soil with an overlying clay layer at 25 ft bgs, the radius of influence for this well may be 100 feet or more, depending on the applied vacuum and extraction rate.

Well SVE-D1 will be used for two purposes: (1) to remove VOCs from soil in the vicinity of borings B18 and B19 (i.e., where the highest TCE concentrations have been detected in this depth range), and (2) to remove VOC vapors that migrate from the underlying groundwater in the area, reducing the potential for further vapor migration. The capillary fringe may limit SVE airflow and effectiveness in soil near the groundwater table.

Vacuum monitoring points for the Deep Vadose Treatment Zone will be designated VMP-D1 and VMP-D2 and will be installed in the same boreholes as SVE-2 and SVE-3 (see above) using nested-well construction. Each vacuum monitoring point will be located approximately 35 feet from well SVE-D1. The vacuum monitoring points will be used to monitor the vacuum induced by extraction from well SVE-D1, thereby providing confirmation of the radial influence of SVE-D1 at the monitoring locations. Soil gas samples will be also be collected from VMP-D1 an VMP-D2 to observe the impact of SVE operations on VOC soil gas concentrations in the Deep Vadose Treatment Zone. The vacuum monitoring points will be constructed so as to allow for conversion to SVE wells if future data suggest the conversion would significantly benefit the soil remediation.

Extraction well SVE-D1 will be constructed with nominal 4-inch diameter PVC well casing and screen. The vacuum monitoring points in the Deep Vadose Treatment Zone will be constructed with nominal 2-inch diameter PVC well casings and screens.

SVE System Capacity

An SVE system with an extraction capacity of approximately 200 standard cubic feet per minute ("scfm") at a maximum operating vacuum of 15 inches of mercury ("in-Hg") will be installed. This capacity will allow for a target extraction rate of 10 to 50 scfm from each of the shallow extraction wells SVE-1, SVE-2, and SVE-3. The remaining blower capacity, expected to be in the range of 50 to 150 scfm, will be applied to the deep extraction well SVE-D1.

SVE Operating Strategy

The SVE system will be operated with priority given to removing VOCs from the Shallow Treatment Zone. Therefore, extraction capacity will be focussed on well SVE-1, and potentially wells SVE-2 and SVE-3, if initial operating data indicates that extraction from these wells will result in significant VOC removal. Extraction rates will be adjusted to extract relatively more air from wells where relatively higher VOC concentrations are detected. As discussed above, wells SVE-2 and SVE-3 may be closed if the VOC removal rate from those wells is not significant.

The blower capacity that is available after attempting to achieve the target extraction rates in the shallow wells will be applied to the deep well SVE-D1. Therefore, it is expected that well SVE-D1 will be operated at an extraction rate of 50 to 150 scfm.

Depending on the operational data, the blower capacity may be re-distributed on a weekly basis to alternate extraction capacity between the shallow and deep wells, thereby maximizing the overall VOC removal rates and optimizing off-gas treatment efficiency.

Off-Gas Treatment and Permitting

Extracted vapors are expected to contain TCE, PCE, and to a lesser extent some of the other VOCs previously detected in soil and soil gas at the Subject Property. TCE and PCE in the vapor phase are readily adsorbed by granular activated carbon ("GAC"). Therefore, GAC will be used for off-gas treatment at the Site.

Webb intends to have the SVE system provided by a contractor with an existing and applicable air permit from the South Coast Air Quality Management District ("SCAQMD"). The "various locations permit" is limited to a 200 scfm capacity SVE system, requires off-gas treatment by GAC, and requires GAC replacement when the outlet total VOC concentration exceeds 50 parts per million by volume ("ppmv").

Monitoring

During startup, the radius of influence for well SVE-1 will be tested by monitoring the vacuum response in wells SVE-2 and SVE-3 and in monitoring points VMP-1 and VMP-2. Similarly, the induced vacuum will be monitored at vacuum monitoring points VMP-D1 and VMP-D2 to observe the influence of extraction well SVE-D1, although it is expected that the radius of influence for well SVE-D1 may extend substantially beyond the vacuum monitoring points.

Immediately after system startup and during the first month of system operation, soil gas samples from each vapor well, vapor probe, and the system influent will be collected and analyzed for total VOCs using an organic vapor meter ("OVM") in the field. The OVM will utilize a photoionization detector ("PID"). Additional OVM samples will be collected on a monthly basis during the course of system operation. These data will be used to track trends in total VOC concentrations being extracted during SVE operation. The operating vacuum and flow rate at each operating SVE well will also be recorded on a weekly basis.

Soil gas samples will be collected from the two vapor extraction wells (SVE-1 and SVE-D1) and the combined influent to the SVE blower immediately after startup of the SVE system and on a monthly basis, thereafter. These samples will be analyzed at a laboratory for halogenated VOCs, using an analytical method similar to and incorporating the target VOCs in EPA Method 8010. These data will be used to track trends in VOC concentrations over time and to quantify VOC removal rates.

EKI plans to collect soil gas samples from vapor monitoring wells SVE-2 and SVE-3 immediately after system startup and following the second, fourth, fifth, and sixth months of operation. However, soil gas samples will not be collected from wells SVE-2 and SVE-3 after the fourth and fifth months of operation if the analytical results from the previous rounds of sampling indicate that TCE and PCE concentrations are less than 10 ug/l. Soil gas samples will also be collected from vapor monitoring probes VMP-1, VMP-2, VMP-D1, and VMP-D2 immediately after the startup of the SVE system and following the third and sixth months of system operation. The soil gas samples will be analyzed at a laboratory for halogenated VOCs, using an analytical method similar to and incorporating the target VOCs in EPA Method 8010. These data will be used to track trends in soil gas VOC concentrations over time and to assist in quantifying the effectiveness of the SVE system.

As VOC vapor concentrations reach low levels, Webb may temporarily shut down the SVE system for approximately one week prior to a scheduled sampling event. Vapor samples would be collected immediately upon startup in order to monitor the "rebound" in VOC concentrations following the shutdown. EKI plans to perform rebound testing prior to the final sampling event following the scheduled six months of operation; however, additional rebound testing may be performed during the course of system operation.

SVE System Shutdown

The SVE system will be operated until the VOC removal rate decreases to the point where it is determined that additional SVE treatment is no longer warranted. EKI will use data collected throughout the course of operation, along with information obtained from rebound testing, to make this determination. Webb will seek RWQCB concurrence when it is determined that SVE operations should be discontinued. At this time, Webb is expecting to operate the SVE system for approximately 6 months.

REPORTING

EKI proposes to prepare quarterly progress reports to present the results of investigation and remediation activities at the Subject Property. The reports will be prepared for each calendar quarter and will include (1) a description of work completed during the quarter, (2) the results of quarterly groundwater monitoring, and (3) the results of SVE system monitoring. These reports will be submitted to the Regional Water Quality Control Board ("RWQCB") approximately one month after the end of each calendar quarter.

SCHEDULE

EKI plans to proceed with clarifier removal concurrent with RWQCB review of this work plan and anticipates completion of this effort in approximately one month. SVE system installation and startup are estimated to be completed within approximately three to four weeks following approval of this workplan. The next quarterly progress report will be submitted by the end of April 1999 for the quarter from January to March 1999.

Please contact us with any comments or questions.

Very truly yours,

ERLER & KALINOWSKI, INC.

Steven G. Miller, P.E. 43419
Project Manager

Attachments

Tables
1. Soil Analytical Results for PCE and TCE

Figures
1. Site Location Map
2. Plan Map Showing Deep Soil Cross Section Through Clarifier
3. Cross-Section A-A' Showing Concentration of TCE in Vadose Zone Soil
4. Concentrations of TCE Detected in Shallow Soil Gas
5. Concentrations of PCE Detected in Shallow Soil Gas
6. Proposed SVE Well Locations

cc: Eli Stanesa, Jervis B. Webb Company

TABLE 1

Soil Analytical Results for PCE and TCE

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Boring Number	Date	Sample Number	Depth (ft. bgs)	Concentration PCE (mg/kg)	Concentration TCE (mg/kg)
B-1	10/28/97	B1-5.5	5.5	0.074	0.024
		B1-11	11	0.130	0.037
		B1-20	20	0.035	0.040
B-2	10/28/97	B2-5.5	5.5	0.018	0.007
		B2-10.5	10.5	0.045	-
B-3	10/28/97	B3-6	6	0.042	0.010
		B3-11	11	0.120	0.034
B-4	10/28/97	B4-6	6	0.076	0.021
		B4-10.5	10.5	n/a	n/a
		B4-16	16	**2.2**	0.092
		B4-20.5	20.5	**140**	**270**
B-5	10/28/97	B5-1	1	n/a	n/a
		B5-6	6	0.025	0.005
		B5-10.5	10.5	0.065	0.190
B-6	10/28/97	B6-6	6	0.130	0.031
		B6-10.5	10.5	0.019	0.025
B-7	10/28/97	B7-2	2	n/a	n/a
		B7-6	6	0.055	0.019
		B7-11	11	-	-
B-8	10/28/97	B8-2	2	n/a	n/a
		B8-6	6	0.003	-
		B8-11	11	0.041	0.050
B-9	10/28/97	B9-5.5	5.5	0.004	-
		B9-10.5	10.5	0.022	0.041
B-10	10/28/97	B10-6	6	0.027	0.006
		B10-11	11	-	0.036
B-11	10/28/97	B11-6	6	0.061	0.016
		B11-11	11	-	0.035
B-12	10/28/97	B12-6	6	-	-
B-13	10/28/97	B13-6	6	-	-
B-15	12/2/97	B15-10	10	-	-
		B15-16	16	-	-
		B15-20.5	20.5	-	-
		B15-26.5	26.5	0.054	0.038
		B15-31	31	0.041	0.520
		B15-35.5	35.5	0.026	0.140
		B15-40	40	-	**1.2**
		B15-44.5	44.5	-	**1.3**

TABLE 1

Soil Analytical Results for PCE and TCE

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Boring Number	Date	Sample Number	Depth (ft. bgs)	Concentration PCE (mg/kg)	Concentration TCE (mg/kg)
B-16	12/2/97	B16-6	6	-	-
		B16-11	11	-	-
		B16-16	16	0.027	-
		B16-21	21	0.041	-
		B16-26	26	0.047	-
		B16-31	31	0.027	-
		B16-35.5	35.5	-	-
		B16-41	41	-	0.410
		B16-46	46	-	0.390
		B16-51	51	-	**1.3**
B-17	12/2/97	B17-6	6	-	-
		B17-11	11	-	-
		B17-16	16	-	-
		B17-21	21	-	-
		B17-26	26	-	0.048
		B17-31.5	31.5	-	0.056
		B17-36	36	-	**1.4**
		B17-41	41	-	**1.2**
		B17-46	46	-	**1.6**
		B17-53.5	53.5	-	**1.4**
B-18	12/2/97	B18-11	11	0.400	0.110
		B18-16	16	0.370	0.610
		B18-21	21	0.660	**16**
		B18-27	27	0.093	0.750
		B18-31	31	0.140	**2**
		B18-36	36	-	0.056
		B18-41	41	0.091	**2.3**
		B18-46	46	0.180	**8.7**
B-19	12/2/97	B19-16	16	0.420	0.200
		B19-21	21	0.280	**1.8**
		B19-26	26	0.280	**1.5**
		B19-31	31	0.250	**1.2**
		B19-36.5	36.5	-	0.110
		B19-41	41	0.160	**4**
		B19-46	46	0.180	**4.3**
MW-1	2/25/98	MW1-10.5	10.5	0.021	0.018
		MW1-20.5	20.5	0.023	0.062
		MW1-30.5	30.5	0.011	0.060
MW-2	2/25/98	MW2-10.5	10.5	-	-
		MW2-20.5	20.5	-	-
		MW2-30.5	30.5	-	-

TABLE 1

Soil Analytical Results for PCE and TCE

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Boring Number	Date	Sample Number	Depth (ft bgs)	Concentration PCE (mg/kg)	Concentration TCE (mg/kg)
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B-3	10/28/97	B3-6	6	0.042	0.010
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B-4	10/28/97	B4-6	6	0.076	0.021
		B4-10.5	10.5	n/a	n/a
		B4-16	16	**2.2**	0.092
		B4-20.5	20.5	**140**	**270**
B-5	10/28/97	B5-1	1	n/a	n/a
		B5-6	6	0.025	0.005
		B5-10.5	10.5	0.065	0.190
B-6	10/28/97	B6-6	6	0.130	0.031
		B6-10.5	10.5	0.019	0.025
B-7	10/28/97	B7-2	2	n/a	n/a
		B7-6	6	0.055	0.019
		B7-11	11	-	-
B-8	10/28/97	B8-2	2	n/a	n/a
		B8-6	6	0.003	-
		B8-11	11	0.041	0.050
B-9	10/28/97	B9-5.5	5.5	0.004	-
		B9-10.5	10.5	0.022	0.041
B-10	10/28/97	B10-6	6	0.027	0.006
		B10-11	11	-	0.036
B-11	10/28/97	B11-6	6	0.061	0.016
		B11-11	11	-	0.035
B-12	10/28/97	B12-6	6	-	-
B-13	10/28/97	B13-6	6	-	-
B-15	12/2/97	B15-10	10	-	-
		B15-16	16	-	-
		B15-20.5	20.5	-	-
		B15-26.5	26.5	0.054	0.038
		B15-31	31	0.041	0.520
		B15-35.5	35.5	0.026	0.140
		B15-40	40	-	**1.2**
		B15-44.5	44.5	-	**1.3**

TABLE 1

Soil Analytical Results for PCE and TCE

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Boring Number	Date	Sample Number	Depth (ft bgs)	Concentration PCE (mg/kg)	Concentration TCE (mg/kg)
B-16	12/2/97	B16-6	6	-	-
		B16-11	11	-	-
		B16-16	16	0.027	-
		B16-21	21	0.041	-
		B16-26	26	0.047	-
		B16-31	31	0.027	-
		B16-35.5	35.5	-	-
		B16-41	41	-	0.410
		B16-46	46	-	0.390
		B16-51	51	-	**1.3**
B-17	12/2/97	B17-6	6	-	-
		B17-11	11	-	-
		B17-16	16	-	-
		B17-21	21	-	-
		B17-26	26	-	0.048
		B17-31.5	31.5	-	0.056
		B17-36	36	-	**1.4**
		B17-41	41	-	**1.2**
		B17-46	46	-	**1.6**
		B17-53.5	53.5	-	**1.4**
B-18	12/2/97	B18-11	11	0.400	0.110
		B18-16	16	0.370	0.610
		B18-21	21	0.660	**16**
		B18-27	27	0.093	0.750
		B18-31	31	0.140	**2**
		B18-36	36	-	0.056
		B18-41	41	0.091	**2.3**
		B18-46	46	0.180	**8.7**
B-19	12/2/97	B19-16	16	0.420	0.200
		B19-21	21	0.280	**1.8**
		B19-26	26	0.280	**1.5**
		B19-31	31	0.250	**1.2**
		B19-36.5	36.5	-	0.110
		B19-41	41	0.160	**4**
		B19-46	46	0.180	**4.3**
MW-1	2/25/98	MW1-10.5	10.5	0.021	0.018
		MW1-20.5	20.5	0.023	0.062
		MW1-30.5	30.5	0.011	0.060
MW-2	2/25/98	MW2-10.5	10.5	-	-
		MW2-20.5	20.5	-	-
		MW2-30.5	30.5	-	-

TABLE 1

Soil Analytical Results for PCE and TCE

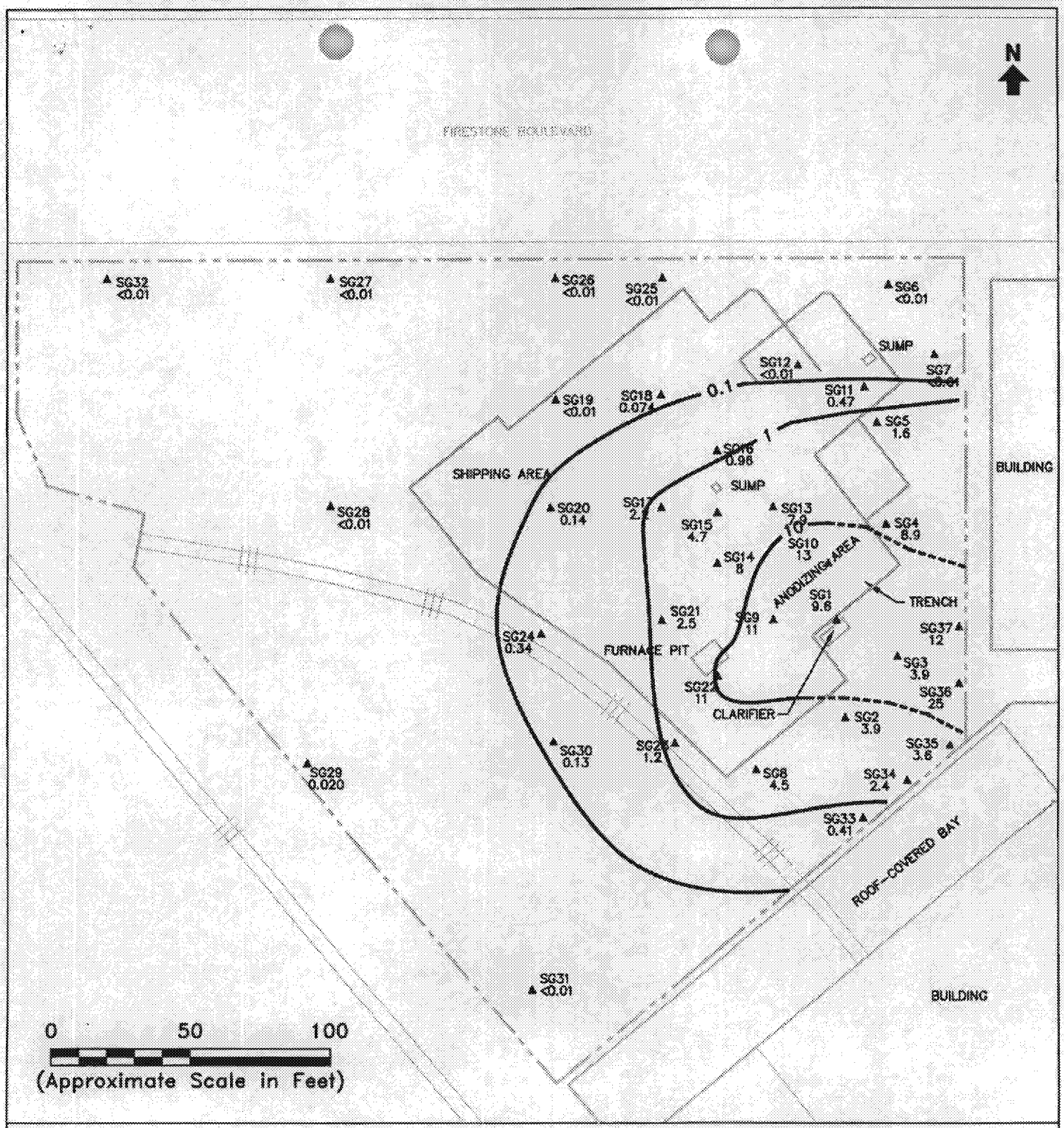
Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Boring Number	Date	Sample Number	Depth (ft bgs)	Concentration PCE (mg/kg)	Concentration TCE (mg/kg)
MW-3	2/25/98	MW3-11	11	-	-
		MW3-20.5	20.5	-	-
		MW3-30.5	30.5	-	-
MW-5	10/28/98	MW-5-21	21	-	0.022
		MW-5-31	31	-	0.011
		MW-5-41	41	-	0.550

Notes:

1. Abbreviations:

PCE = tetrachloroethene
TCE = trichloroethene
ft bgs = feet beneath ground surface
mg/kg = micrograms per kilogram
- = not detected
n/a = not analyzed
BOLD = analyte present above 1 mg/kg.



LEGEND

- ▲ SOIL GAS SAMPLING LOCATION
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

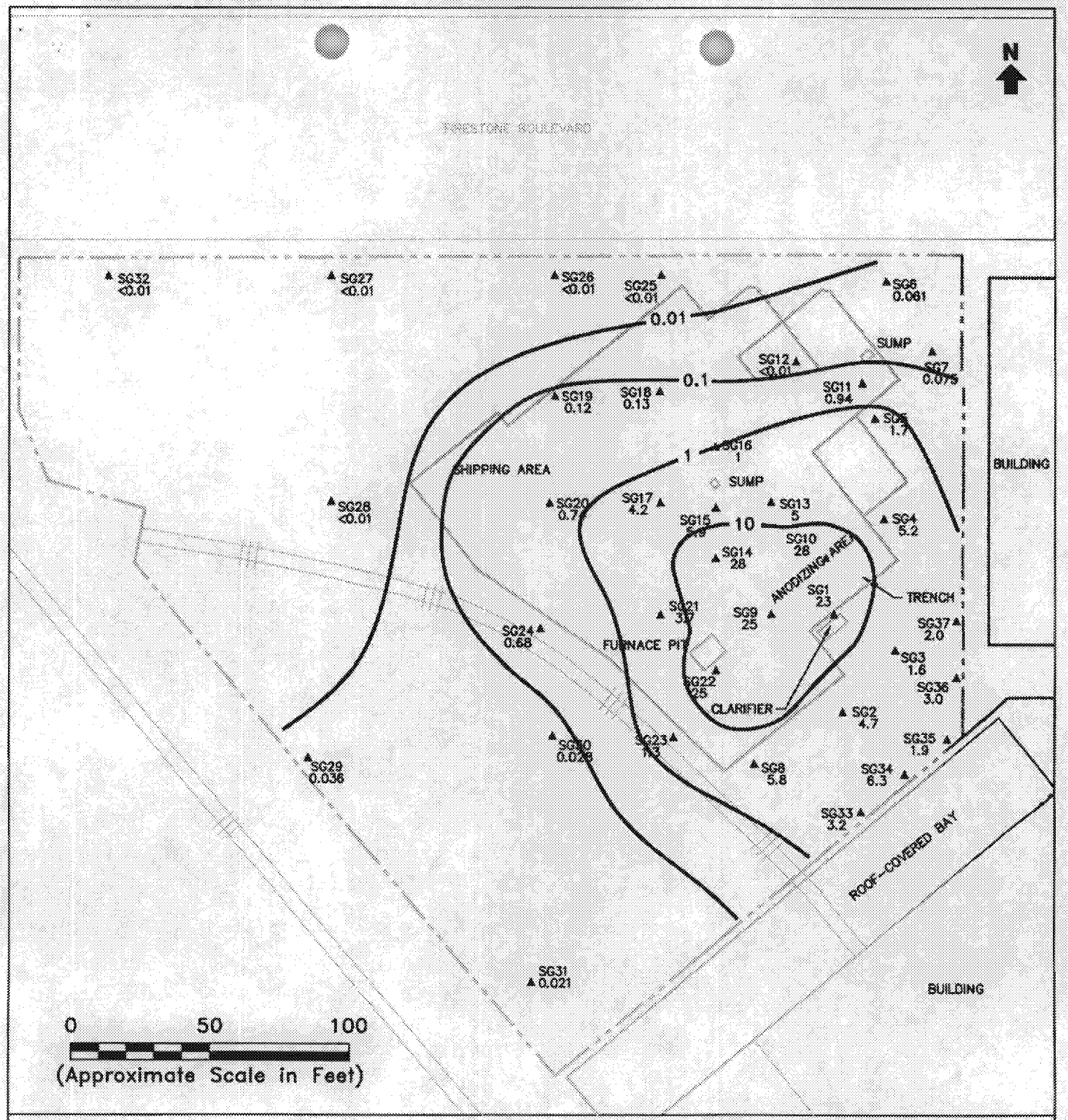
1. All locations are approximate.
2. Soil gas concentration contours in units of micrograms per liter by volume in air.

Erler & Kalinowski, Inc.

Concentrations of TCE Detected in Shallow Soil Gas

Jervis B. Webb Company
South Gate, CA
April 1999
EKI 961025.03

Figure 4



LEGEND

- ▲ SOIL GAS SAMPLING LOCATION
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

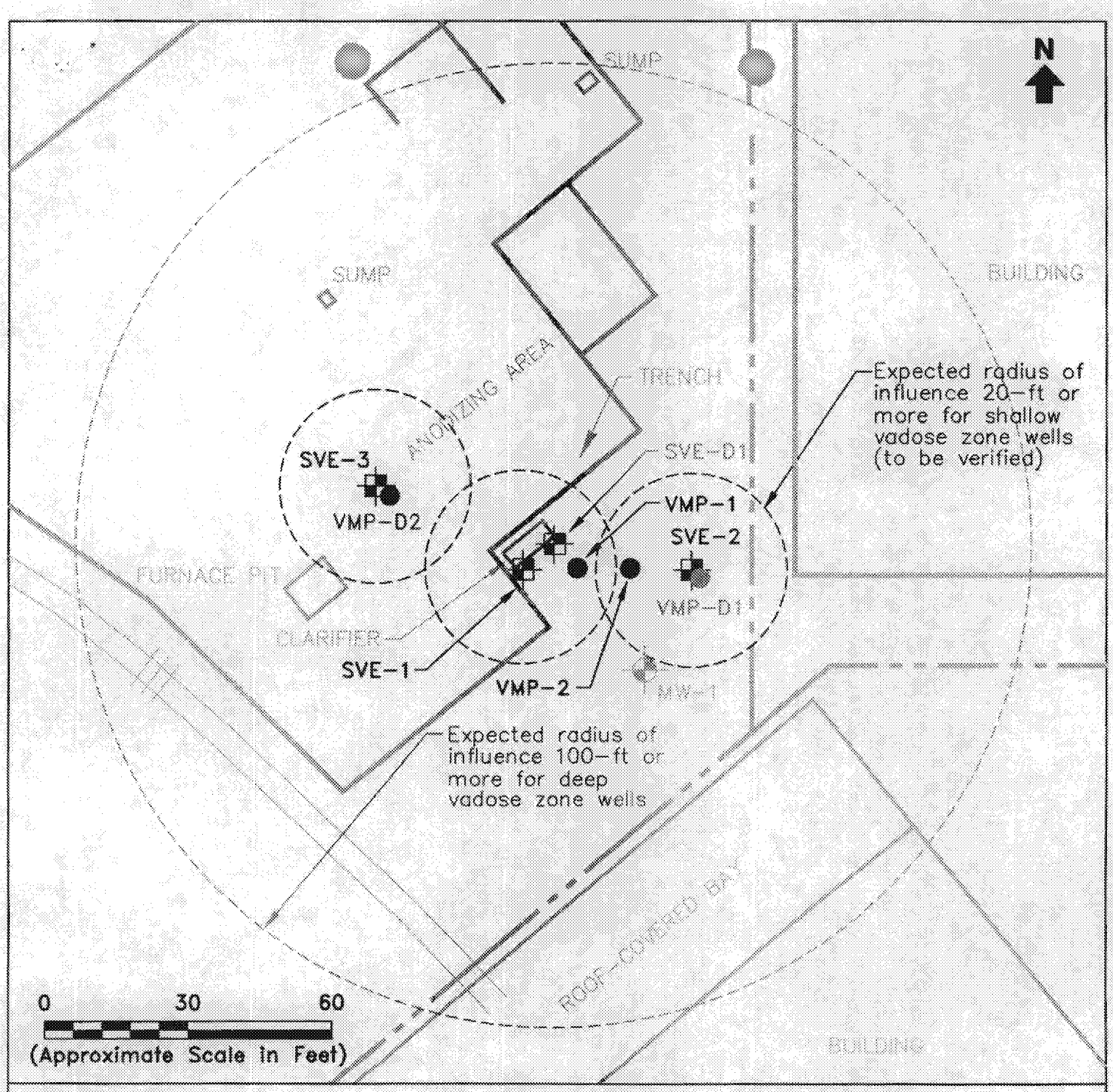
1. All locations are approximate.
2. Soil gas concentration contours in units of micrograms per liter in air.

Erler & Kalinowski, Inc.

Concentrations of PCE Detected in Shallow Soil Gas

Jervis B. Webb Company
South Gate, CA
April 1999
EKI 961025.03

Figure 5



LEGEND

- PROPOSED SOIL VAPOR EXTRACTION WELL
- PROPOSED VACUUM MONITORING POINT
- LOCATION OF GROUNDWATER MONITORING WELL
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Erler & Kalinowski, Inc.

Proposed SVE Well Locations

Notes:

1. Shallow SVE wells and expected radii of influence are shown in green. Deep SVE wells and expected radius of influence are shown in blue.
2. All locations are approximate.

Jervis B. Webb Company
South Gate, CA
April 1999
EKI 961025.03
Figure 6

Corporation
947 Michelson Drive, Suite 200
Irvine, CA 92612-1692
Tel. 949.261.6441
Fax. 949.474.8309

A Member of The IT Group

2001 OCT 11 P 1:29

the IT group

October 8, 2001

California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013
ATTN: Steven Hariri

RE: Explanation of SPLP Extraction Method
Soil Closure Report
Jervis B. Webb of California
South Gate, CA

Dear Mr. Hariri:

Per your request, I am writing to provide a further explanation of the SPLP extraction method used for the Jervis B. Webb Soil Closure Report submitted on October 4, 2001. I spoke with Larry Lem, Laboratory Director at Calscience Environmental Laboratories, who performed the SPLP extraction and testing for us. Mr. Lem stated that the SPLP method (EPA Method 1312) uses a 20:1 dilution (20 times the volume of water to soil) in the leaching process. Note: a 10-fold dilution is used in other leaching methods such the TCLP and the STLC. The concentration that is reported by the lab is the exact concentration of the leachate (no modification made for dilution). Therefore the concentration of the leachate can be directly compared to the MCL. In our case, the 10 ug/l from sample CB-4 @ 30 feet can be compared to the MCL for TCE of 5 ug/l. Note that because of the 20-fold dilution, the maximum concentration of the leachate (if all VOCs in the sample were leachable) would be 31 ug/l (630 divided by 20). Since our concentration was 10 ug/l, about 1/3 of the VOCs in the sample are leachable (and 2/3 are not leachable).

The SPLP method utilizes de-ionized water that is modified to a pH of 5.5 using sulfuric acid. This method is the least aggressive of the leaching methods. The other methods use a different acid and lower pH.

I trust this information will be of use to you. Please call me at (949) 660-7511 if I can be of further assistance.

Sincerely,
IT Corporation

Gary Cronk

Gary Cronk, P.E.
Project Manager

Cc: Mike Farley, Jervis B. Webb
Michael Feeley, Latham & Watkins

file

Quarterly gw rpts through ?

Erler &
Kalinowski, Inc.

Additional Groundwater Investigation and Quarterly Monitoring Report for October to December 1998

Jervis B. Webb Company Property
5030 Firestone Boulevard
South Gate, California

13 January 1999

**Erler &
Kalinowski, Inc.**

Consulting Engineers and Scientists
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855

TABLE 1
Well Construction Details

Additional Groundwater Investigation and
Quarterly Monitoring Report for October to December 1998
Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Well ID	Installation Date	Boring Depth (ft bgs)	Boring Diameter (inches)	Casing Diameter (inches)	Perforated Interval (ft bgs)	Casing Material	Screen Material	Perforation Size (inches)	Filter Pack Material	Surface Completion
MW-1	2/25/98	73	10-1/4	4	40 - 70	PVC	PVC	0.010	#1C Lonestar	12" EMCO
MW-2	2/25/98	73	10-1/4	4	40 - 70	PVC	PVC	0.010	#1C Lonestar	12" EMCO
MW-3	2/25/98	73	10-1/4	4	40 - 70	PVC	PVC	0.010	#1C Lonestar	12" EMCO
MW-4	10/28/98	71	10-1/4	4	40 - 70	PVC	PVC	0.010	#1C Lonestar	12" EMCO
MW-5	10/28/98	71	10-1/4	4	40 - 70	PVC	PVC	0.010	#1C Lonestar	12" EMCO

NOTES: Abbreviations: ft bgs = feet beneath the ground surface
PVC = polyvinyl chloride

TABLE 5

Analytical Results for Monitoring Well Groundwater Samples

Additional Groundwater Investigation and Quarterly Monitoring Report for October to December 1998

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

Well ID	Sample Number	Sample Date	Analyte Concentration										
			Benzene (ug/L)	Toluene (ug/L)	Xylenes (ug/L)	1,1-DCA (ug/L)	1,2-DCA (ug/L)	1,1-DCE (ug/L)	c-1,2-DCE (ug/L)	t-1,2-DCE (ug/L)	PCE (ug/L)	TCE (ug/L)	TDS (mg/L)
MW-1	MW-1-0304	3/4/98	<0.5	<0.5	<0.5	<0.5	<0.5	**220**	**130**	<0.5	**140**	**24,000**	--
	MW-1-0304DUP	3/4/98	<0.5	<0.5	<0.5	<0.5	<0.5	**210**	**150**	<0.5	**160**	**25,000**	--
	MW-1-0520	5/20/98	<125	<125	<125	<125	<125	**160**	**130**	<125	<125	**24,000**	**1,500**
	MW-1	11/5/98	<125	<125	<125	<125	<125	**140**	**160**	<125	**170**	**28,000**	--
MW-2	MW-2-0304	3/4/98	<0.5	<0.5	<0.5	**13**	<0.5	**34**	**65**	<0.5	<0.5	**2,700**	--
	MW-2-0520	5/20/98	<10	<10	<10	**14**	<0.5	**38**	**68**	<10	<10	**3,000**	**2,500**
	MW-2	11/5/98	<10	<10	<10	**13**	<10	**36**	**68**	<10	<10	**3,200**	**2,600**
MW-3	MW-3-0304	3/4/98	<0.5	**13**	<0.5	**14**	<0.5	**82**	**200**	<0.5	<0.5	**2,800**	--
	MW-3-0520	5/20/98	<10	<10	<10	**13**	<0.5	**58**	**230**	**15**	<10	**2,800**	**1,100**
	MW-3	11/5/98	<10	<10	<10	**11**	<10	**66**	**240**	**18**	<10	**2,300**	--
MW-4	MW-4	11/5/98	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	**0.67**	<0.5	<0.5	**6.7**	**3,600**
MW-5	MW-5	11/5/98	<25	<25	<25	<25	<25	**42**	**380**	**30**	<25	**5,000**	--
	MW-5-DUP	11/5/98	<25	<25	<25	<25	<25	**40**	**360**	**29**	<25	**4,800**	--
California MCL			1	150	1750	5	0.5	6	6	10	5	5	

NOTES: Abbreviations:

xylenes = total xylene isomers
1,1-DCA = 1,1-dichloroethane
1,1-DCE = 1,1-dichloroethene
1,2-DCA = 1,2-dichloroethane
c-1,2-DCE = cis-1,2-dichloroethene
t-1,2-DCE = trans-1,2-dichloroethene
VOCs = volatile organic compounds

PCE = tetrachloroethene
TCE = trichloroethene
1,1,1-TCA = 1,1,1-trichloroethane
TDS = total dissolved solids
ug/L = micrograms per liter
mg/L = milligrams per liter
-- indicates not analyzed

1. Analyses performed by Orange Coast Analytical, Inc. using EPA Method 8260 for VOCs and EPA Method 160.1 for TDS.
2. California maximum contaminant levels ("MCLs") are as reported in the Drinking Water Standards and Health Advisories Table by U.S. EPA Region IX, dated June 1998.

TABLE 4

Analytical Results for Direct-Push Groundwater Samples

Additional Groundwater Investigation and Quarterly Monitoring Report for October to December 1998

Jervis B. Webb Company, 5030 Firestone Boulevard, South Gate, California

PIPP Location	Sample Date	Depth (ft bgs)	Volatile Organic Compounds - EPA Method 8260 (ug/L)											
			Acetone	MEK	Benzene	Toluene	Xylenes	1,1-DCA	1,2-DCA	1,1-DCE	c-1,2-DCE	t-1,2-DCE	PCE	TCE
CPT-1	10/1/98	55	**170**	**4.6**	**1.6**	<0.5	**1.6**	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5
CPT-1	10/1/98	95	**8.1**	<1	<0.5	<0.5	<0.5	<0.5	**5.3**	<0.5	<0.5	<0.5	<0.5	<0.
CPT-2	10/1/98	55	**300**	**3.5**	<1	**1.1**	<1	<1	<1	<1	<1	<1	<1	**1.6**
CPT-3	10/1/98	55	**170**	**2.7**	**0.58**	**0.55**	**0.66**	<0.5	<0.5	<0.5	**2.6**	<0.5	<0.5	**6.3**
CPT-4A	10/1/98	55	**95**	**2.2**	<1	**1.1**	**1.2**	**1.2**	<1	**4.1**	**11**	<1	<1	**220**
CPT-4B	10/1/98	55	**80**	**8.4**	<1	<1	<1	**1.1**	<1	**3.4**	**10**	<1	<1	**200**
CPT-5	10/1/98	55	**480**	<25	<13	<13	<13	<13	<13	<13	**110**	<13	<13	**3,800**
CPT-6	10/2/98	55	<400	<200	<100	<100	<100	**240**	<100	<100	**130**	<100	**110**	**35,000**
CPT-7	10/2/98	55	<500	<250	<125	<125	<125	**160**	<125	<125	**190**	<125	<125	**27,000**
CPT-8	10/2/98	55	**16**	<1	<0.5	<0.5	<0.5	**1.4**	<0.5	**6.7**	**11**	**1.3**	<0.5	**140**
CPT-9	10/2/98	55	**490**	**7.7**	<1	<1	<1	<1	<1	<1	<1	<1	<1	**9.1**
California MCL			none	none	1	150	1,750	5	0.5	6	6	10	5	5

NOTES: Abbreviations:

PIPP = Push-In Plastic Piezometer
ft bgs = feet below ground surface
ug/L = micrograms per liter
MEK = Methyl ethyl ketone (2-butanone)
Xylenes = Total xylenes
1,1-DCA = 1,1-Dichloroethane
1,2-DCA = 1,2-Dichloroethane
1,1-DCE = 1,1-Dichloroethene
c-1,2-DCE = cis-1,2-Dichloroethene
t-1,2-DCE = trans-1,2-Dichloroethene
PCE = Tetrachloroethene
TCE = Trichloroethene

1. Sample CPT-4B is a duplicate of sample CPT-4A.
2. Chemical analyses were performed by Orange Coast Analytical, Inc. in Tustin, California
3. California maximum contaminant levels ("MCLs") are as reported in the Drinking Water Standards and Health Advisories Table by U.S. EPA Region IX, dated June 1998. "none" indicates that no MCL (California or federal) has been established.

Phase II Soil Investigation Report

5030 Firestone Boulevard
South Gate, California

18 February 1998

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Phase II Soil Investigation Report
Jervis B. Webb Company Property
5030 Firestone Boulevard, South Gate, California

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1. EXECUTIVE SUMMARY

Erler & Kalinowski, Inc. ("EKI") was retained by the Jervis B. Webb Company ("Webb") to perform a series of environmental investigations of the property at 5030 Firestone Boulevard in South Gate, California ("Subject Property"). The *Phase II Soil Investigation Report* summarizes investigations of the Subject Property completed by EKI through December 1997. A brief summary of the major findings of EKI's investigations at the Subject Property follows:

1. The Subject Property consists of a single parcel of land approximately 1.4 acres in size and contains one single-story former manufacturing building of approximately 20,000 square feet. The property was apparently developed between 1950 and 1953.

2. Blake Rivet Company ("Blake") manufactured aircraft rivets at the Subject Property from the 1950s until approximately 1980. Blake's manufacturing process at the Subject Property included an above ground anodizing operation that generated wastewater. Wastewater was discharged, pursuant to a permit, to a three-stage clarifier and then to the sanitary sewer. Blake apparently stored a number of raw materials at the Subject Property including metal stock and anodizing solutions. Documents available to EKI did not identify historical use or storage of chlorinated organic solvents at the Subject Property.

3. Following Blake, Webb used the Subject Property for storage of metal stock, equipment and other materials. The concrete area at the location of the clarifier was also used by Webb for temporary storage of drums of hazardous wastes. The clarifier was not used by Webb. EKI completed an initial inspection of the Subject Property on 10 April 1996. No drums or significant staining of concrete or asphalt around the clarifier was observed by EKI during the site inspection. Currently, the property is unoccupied and has been cleared of all equipment and materials. The clarifier is currently filled with sand.

   Webb manufacturing operations were primarily located on the adjacent off-site property at 9301 Rayo Avenue ("Rayo Property"). Webb's activities at 9301 Rayo Avenue included metal fabrication, finishing, painting and assembly operations associated with the manufacture of industrial conveyor systems.

4. EKI observed indications of below ground concrete structures at several locations in the building. These include a concrete-lined sump and a shallow concrete-lined machine trench. The concrete floor in the building contains numerous patches where former structures or improvements may have been located. Concrete in the former anodizing area of the building is pitted, etched, broken and or cracking in several areas.

5. On 28 October 1997, Vironex, Inc. ("Vironex") of El Segundo, California completed fourteen soil borings at the Subject Property. The objective of the soil investigation was to provide chemical data to determine whether chemical releases occurred in former chemical use and storage areas at the Subject Property. Soil was cored to maximum depths ranging from approximately 10 feet below ground surface ("ft bgs") at various locations inside and outside the building, and to 20 ft bgs in the immediate vicinity of the clarifier. Soil samples were analyzed for pH by EPA Method 9045, total extractable petroleum hydrocarbons ("TEPH") by EPA Method 8015 modified, California Code of Regulations Metals ("CCR-Metals"), and volatile organic compounds ("VOCs") by EPA Methods 8240 and 8010.

6. Fourteen soil samples were analyzed for CCR metals. CCR metals were not detected at elevated concentrations in soil samples collected from beneath and around the clarifier and from other former process areas. Only one of the fourteen analyses for metals had a detectable concentration of hexavalent chromium, sample B4-10.5 had a concentration of 0.88 milligrams per kilogram ("mg/kg"). Samples of soil from above and below sample B4-10.5 (samples B4-6 and B4-16) did not have detectable hexavalent chromium.

7. TEPH was not detected in any of the ten soil samples analyzed for it. Soil pH was found to range from 6.3 to 8.8 in the samples analyzed.

8. VOCs were detected in samples of soil collected during the October 1997 soil investigation. Trichloroethene ("TCE") and tetrachloroethene ("PCE") were detected at maximum concentrations of 270 mg/kg and 140 mg/kg, respectively, in one soil sample (B4-20.5) collected from approximately 20 ft bgs beneath the clarifier. TCE and PCE were detected in most of the soil samples collected during October 1997 in the area of the former anodizing operations and, except for samples from boring B4, were detected at concentrations of less than 1 mg/kg. No other VOCs were detected.

9. On 1 and 2 December 1997, Interphase, Inc. ("Interphase") of Commerce, California completed a soil gas survey at the Subject Property. The objective of the soil gas survey was to provide additional subsurface data to identify potential source areas for the VOCs detected in samples of soil collected during the October 1997 investigation. Soil gas samples were collected from 37 separate locations at a depth of approximately 5 ft bgs and analyzed for 23 VOCs consistent with California Regional Water Quality Control Board - Los Angeles Region ("RWQCB") Primary Target Compounds.

   The analytical data from the soil gas survey indicated that TCE and PCE are the primary chemicals of concern in shallow soil at the Subject Property. TCE was detected at concentrations ranging from 0.074 micrograms per liter ("ug/L") to 25 ug/L. PCE was detected at concentrations ranging from 0.021 ug/L to 28 ug/L. 1,1,1-Trichloroethane ("1,1,1-TCA") was also detected at low concentrations in approximately half of the soil gas samples with a maximum of 0.89 ug/L.

Chloroform, dichlorodifluoromethane ("Freon-12"), and trichlorofluoromethane ("Freon-11") were also detected in a few samples at low concentrations.

10. On 2 and 3 December 1997, West Hazmat Drilling Corporation ("West Hazmat") of Anaheim, California completed five deep soil borings at the Subject Property. The purpose of the deep soil investigation was to determine the vertical extent of VOC occurrence in unsaturated soil beneath the clarifier and anodizing area. Soil borings were completed to maximum depths ranging from 46.5 to 62.5 ft bgs. Groundwater was encountered at a depth of approximately 57 ft bgs. Soil samples were analyzed for VOCs by EPA Method 8010. Additional soil samples were analyzed for geotechnical properties.

11. TCE and PCE were detected in samples of soil collected during the December 1997 investigation. TCE was detected at concentrations ranging from 0.048 mg/kg to 16 mg/kg. PCE was detected at concentrations ranging from 0.026 mg/kg to 0.66 mg/kg. TCE was detected in the deepest soil samples collected from each boring completed during the December 1997 investigation at concentrations ranging from 1.3 mg/kg to 8.7 mg/kg.

12. During the December 1997 investigation, twelve soil samples were selected for geotechnical analyses including total carbon by the Walkley-Black method, moisture content by ASTM Method D2216, dry density by ASTM Method D2937, and effective permeability and air conductivity by API Method RP40. The soil samples analyzed for geotechnical properties were selected to represent most of the geologic materials encountered in the vadose zone. Analytical results indicate significant soil moisture and total carbon concentrations in the vadose zone. Moisture content ranged from 7% to 39.9%. Total organic carbon ranged from not detected to a concentration of 1.11%. Dry soil density ranged from 82.8 pounds per cubic foot ("pcf") to 112.8 pcf. Of twelve samples analyzed for air conductivity and effective permeability, six samples did not conduct air.

On the basis of the results of investigations conducted to date it appears that further actions are necessary to address the presence of VOCs in the subsurface at the Subject property.

4. REGIONAL HYDROGEOLOGICAL CONDITIONS

Unless otherwise noted, the information provided in this section was obtained from the California Department of Water Resources ("DWR") *Bulletin No. 104: Planned Utilization of the Groundwater Basins of the Coastal Plain of Los Angeles County, Appendix A, Groundwater Geology* dated June 1961.

The Subject Property is located in the Central Basin Pressure Area of the Central Basin of the Coastal Plain of Los Angeles County. Ground surface elevation at the Subject Property is roughly 110 feet above mean sea level (USGS, 1964). The surface topography of the Subject Property and vicinity appears to slope gently to the southeast in the general direction of the Los Angeles River. The Los Angeles River is located approximately 1,200 feet east of the Subject Property at its nearest location (see Figure 1, DWR, 1964).

The Subject Property is located within the Downey Plain, an alluvial depositional feature of Recent age that extends across the central lowland areas of the Central Basin. Depositional materials associated with this feature were deposited as alluvial fans formed by the Los Angeles and Rio Hondo-San Gabriel River systems. These alluvial systems have formed a very gentle plain. However, during past flood times these large rivers have produced some erosional terraces and deposited debris over most of the area. The materials associated with the Downey Plain are also referred to as Recent Alluvium. Little deformation of the Recent alluvial sediments has occurred except where they cross techtonically active areas.

The Subject Property is located along the northern axis of the Paramount Syncline, a depressional deformation feature trending northwest-southeast in the vicinity of the Subject Property. This structure was formed by the Early Pleistocene deformation of the Central Basin. The trough-shaped geometry of this structure has produced folding of Early Pleistocene deposits of primarily the Lakewood and San Pedro Formations. According to DWR, no displacement of aquifers is apparent in the vicinity of the Subject Property.

The water-bearing materials composing the groundwater basin in the vicinity of the Subject Property are Recent to Pliocene in age. These materials include unconsolidated and semi-consolidated marine and non-marine alluvial sediments. Sizes of individual particles grades from course gravel and boulders to clay. Following is a description of the major aquifers that comprise the groundwater basin in the vicinity of the Subject Property.

4.1. Regional Aquifers

The area of the Subject Property is underlain by several major hydrostratigraphic units within three geological formations: the Recent Alluvium, Lakewood Formation and San Pedro Formation. In the vicinity of the Subject Property the Recent Alluvium is present from surface elevation (110 feet above mean sea level "ft. msl") to approximately 20 to 80 ft bgs. The Recent Alluvium is apparently comprised of the Bellflower Aquiclude and Gaspur Aquifer. However, it is apparent that the Gaspur Aquifer may be partially or completely absent in the immediate vicinity of the Subject Property. In the absence of the Gaspur aquifer, an unnamed confining layer of the Lakewood Formation would compose a portion of the subsurface materials between 20 and 80 ft bgs. (Plates 6A and 6E, DWR, 1961).

The first aquifer in the vicinity of the Subject Property appears to be the Exposition Aquifer of the Lakewood Formation. The Exposition Aquifer reportedly begins at about 80 to 90 feet below ground surface and is roughly 100 to 120 feet thick. Underlying the Exposition Aquifer is an unnamed confining layer that may be present in substantial thickness in the vicinity of the Subject Property. Beneath the unnamed confining layer and/or Exposition Aquifer is the Gage Aquifer which is also part of the Lakewood Formation. The Gage Aquifer appears to begin at approximately 220 to 300 ft bgs, depending on the thickness of the unnamed confining layer, and is roughly 50 to 90 feet thick.

Beneath the Lakewood Formation is the San Pedro Formation which consists of, in descending order, a significant unnamed aquiclude, Jefferson Aquifer, Lynwood Aquifer, Silverado Aquifer, and Sunnyside Aquifer. The Jefferson, Lynwood and Silverado aquifers range in thickness from 80 to 250 feet thick in the vicinity of the Subject Property and may be interbedded by minor confining layers. The base of the Silverado Aquifer is approximately 930 to 950 ft bgs. The Silverado and Sunnyside Aquifers are interbedded by an unnamed confining layer approximately 260 to 340 feet in thickness. The Sunnyside Aquifer is 300 feet thick in the vicinity of the Subject Property. (Plates 6A and 6E, DWR, 1961).

Underlying the San Pedro Formation are the Pliocene marine sediments of the Pico Formation. Although portions of the Pico Formation may be sufficiently permeable to transmit water, the water is of poor quality and unsuitable for general use.

4.2. Regional and Local Groundwater Flow

According to the Water Replenishment District of Southern California ("WRD"), deep aquifer groundwater contours for water year 1995-1996 indicate southwesterly trending groundwater flow from the Whittier Narrows area into the Central Basin Pressure Area with a gradient of approximately 0.007 feet per foot. Depth to groundwater in the vicinity of the Subject Property is indicated to be approximately 80 to 90 ft bgs. (WRD, 1997)

Based on groundwater monitoring data from the Dial Corporation site, across Rayo Avenue and several hundred feet southeast of the Subject Property, groundwater flow is in a southerly direction at a gradient of approximately 0.003 feet/foot. The depth to groundwater in two monitoring wells located along Rayo Avenue ranged from about 45 to 55 ft bgs from April 1992 to April 1995. One well on the Dial Corporation site was found to have shallower perched groundwater (EMCON, 1995). Bechtel, however, reported that groundwater flow in the "upper group of aquifers" is to the north-northwest. (Bechtel 1994, page 6)

Actual depth to groundwater at the Subject Property was found to be approximately 57 ft bgs at the southeasterly boundary during investigations by EKI. The direction of groundwater flow in the water table aquifer beneath the Subject Property has not been determined.

6. FINDINGS

6.1. Chemicals of Concern

EKI's investigations included sampling and analysis of soil gas for VOCs and soil for VOCs, metals, pH and TEPH. On the basis of the analyses completed it appears that VOCs, specifically TCE and PCE, are present in the vadose soil at the Subject Property at concentrations which warrant further investigation. Other chemicals do not appear to warrant further investigation.

6.2 Potential Source Areas

The clarifier and former anodizing operation area appears to be the location of past releases of TCE and PCE. The highest VOC concentrations were detected in the general area of the clarifier and former anodizing operations. The soil sample (B4-20.5) with the highest TCE and PCE concentrations was collected beneath the clarifier. Based on sampling results, no other significant potential source area was identified.

6.3 Distribution of TCE and PCE in Vadose Soil

Concentrations of TCE and PCE detected in shallow soil were relatively low compared to concentrations of these chemicals detected in deeper soil samples. Both TCE and PCE were detected in most of the shallow soil samples collected in the area of the clarifier and former anodizing operations. The highest concentrations of TCE and PCE detected in soil samples from 11 ft bgs or less were 0.11 mg/kg and 0.40 mg/kg, respectively, both in sample B18-11 next to the clarifier.

The highest concentrations of TCE and PCE detected at the site were in deep soil samples (between 20 ft bgs to 46 ft bgs) from borings B4, B18, and B19 next to the clarifier. The highest concentration of each was detected in soil sample B4-20.5 beneath the clarifier with TCE at 270 mg/kg and PCE at 140 mg/kg. Concentrations of TCE were greater than 1 mg/kg in most of the soil samples analyzed between 20 ft bgs and 46 ft bgs at the clarifier (Figure 10). Concentrations of PCE were much lower in the same soil samples. None of the soil collected from below sample B4-20.5 had concentrations of PCE greater than 0.66 mg/kg.

There appears to have been lateral migration of TCE, and to a lesser extent also PCE, from the area of the clarifier. The deepest soil sample from each of the three perimeter soil borings B15, B16, and B17 (each located approximately 50 feet from the clarifier) was found to have a concentration of TCE greater than 1 mg/kg (B15-44.5, B16-53.5, and B17-46). PCE, however, was not detected in the deepest samples from the perimeter

borings. An approximation of the lateral distribution of TCE in soil at 20 and 40 ft bgs are shown on Figures 11 and 12, respectively.

The depth to groundwater was found to be approximately 57 ft bgs during these investigations. No groundwater sampling was performed.

6.4 Conclusions

On the basis of the results of investigations conducted to date it appears that further actions are necessary to address the presence of VOCs in the subsurface at the Subject property.

Phase II Groundwater Investigation Report

Jervis B. Webb Company Property
5030 Firestone Boulevard
South Gate, California

30 June 1998

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Phase II Groundwater Investigation Report
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D	Laboratory Reports and Chain-of-Custody Forms for Groundwater Sampling

1. INTRODUCTION

Erler & Kalinowski, Inc. ("EKI") is pleased to present this *Phase II Groundwater Investigation Report* for the property owned by the Jervis B. Webb Co. ("Webb") and located at 5030 Firestone Boulevard in South Gate, California ("Subject Property" or "Site;" see Figure 1). The principal objectives of this investigation were to determine if volatile organic compounds ("VOCs") detected in samples of soil collected at the Subject Property are also present in groundwater beneath the Site and to estimate the direction of groundwater flow beneath the Site.

Phase II investigations of areas of environmental concern and vadose zone soil at the Subject Property were completed by EKI from October through December 1997. Chemical analyses of several samples of soil collected at the Site detected two VOCs, trichloroethene ("TCE") and tetrachloroethene ("PCE"). The highest concentrations of TCE (270 milligrams per kilogram or mg/kg) and PCE (140 mg/kg) were detected in samples of soil collected at depths of 20 feet to 46 feet beneath the ground surface ("ft bgs") near the clarifier and former anodizing areas of the Site. It was concluded by Webb that two VOCs, TCE and PCE, were present in vadose zone soil at the Subject Property at concentrations which warranted further investigation. The results of the Phase II soil investigation were reported in EKI's *Phase II Soil Investigation Report* for the property located at 5030 Firestone Boulevard in South Gate, California, dated 18 February 1998 ("Phase II Soil Report").

In a meeting attended by staff of EKI and the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") on 6 February 1998, staff of the RWQCB indicated that they concurred with EKI's presentation of the findings of the Phase II soil investigation, and stated that the next phase of investigation at the Subject Property should include sampling and analysis groundwater at both on-site and off-site locations.

The Phase II groundwater investigation documented in this report included installation and sampling of three groundwater monitoring wells and additional characterization of subsurface soil at the Subject Property. Groundwater was sampled from the three on-site wells on 4 March 1998 and on 20 May 1998. In addition, samples of groundwater were collected from two off-site groundwater monitoring wells owned by the Dial Corporation ("Dial"), located south of the Subject Property along Rayo Avenue, during the groundwater monitoring event 20 May 1998.

EKI's investigations of the Subject Property were performed in accordance with applicable guidelines and general requirements of the RWQCB concerning subsurface investigations. EKI investigation activities were performed under the supervision of Mr. Steven G. Miller, P.E., a State of California registered civil engineer.

2. REGIONAL HYDROGEOLOGY

Unless otherwise noted, the information provided in this section was largely obtained from the California Department of Water Resources ("DWR") *Bulletin No. 104: Planned Utilization of the Groundwater Basins of the Coastal Plain of Los Angeles County, Appendix A, Groundwater Geology,* dated June 1961.

The Subject Property is located in the Coastal Plain of Los Angeles County. Ground surface elevation at the Subject Property is roughly 110 feet above mean sea level (USGS, 1964). The surface topography of the Subject Property and vicinity appears to slope gently to the southeast in the general direction of the Los Angeles River. The Los Angeles River is located approximately 1,200 feet east of the Subject Property at its nearest location (see Figure 1).

The Subject Property is located within the Southgate-Santa Ana Depression of the Downey Plain physiographic province, an alluvial depositional feature primarily composed of Quaternary sediments. Depositional materials associated with this feature were deposited as alluvial fans formed by the Los Angeles, Rio Hondo, and San Gabriel River systems. Sediments encountered from the ground surface to the greatest depth of investigation at the Subject Property (approximately 73 ft bgs) are referred to as Recent Alluvium.

Hydrologically, the Subject Property is located within the Central Basin Pressure Area of the Los Angeles Central Groundwater Basin. According to DWR, 1961, the water-bearing geologic members of regional significance that may be encountered beneath the Subject Property are, with increasing depth, the Bellflower Aquiclude and the Gaspur (or Exposition) Aquifer of the Recent Alluvium, the Exposition (or Gaspur) and Gage Aquifers of the upper Pleistocene Lakewood Formation, and the Hollydale, Jefferson, Lynwood, and Silverado Aquifers of the lower Pleistocene San Pedro Formation. Referring to maps in DWR, 1961, the groundwater encountered at the Subject Property during the investigation described in this report appears to occur within sediments the Bellflower Aquiclude and may be directly underlain by saturated sediments of the either the Gaspur Aquifer or the Exposition Aquifer (these aquifers are in contact near the Subject Property). The bottom of the Exposition Aquifer may occur at approximately 170 ft bgs near the Subject Property, according to DWR, 1961. Although no data is presented in the vicinity of the Subject Property, it can be inferred from maps in the DWR, 1961 report that the base of the freshwater-bearing sediments near the Subject Property probably occurs near 3,000 ft bgs.

According to the Water Replenishment District of Southern California ("WRDSC"), deep aquifer (probably the Silverado Aquifer) groundwater contours for water year 1995-1996 indicate southwesterly trending groundwater flow from the Whittier Narrows area into the

Central Basin Pressure Area with a gradient of approximately 0.007 feet per foot (WRDSC, 1997).

The City of South Gate supplies water to the Subject Property and the surrounding area. The City has 14 water supply wells of which 11 are currently active. At least four of the active wells have been found to contain PCE and so extracted groundwater from these wells is being treated (telephone conversation between Mr. John Chambers, City of South Gate and Mr. Steven Miller of EKI on 29 April 1996.)

Water quality has been monitored at several City of South Gate wells near the Subject Property by the WRDSC. The following table identifies the chlorinated VOCs detected in wells monitored by the WRDSC that are located within approximately one-half mile of the Subject Property (WRDSC, 1995):

South Gate Well No.	Approximate Distance/ Direction from the Subject Property	Approximate Screen Interval (ft bgs)	Aquifer Screened	VOC(s) Detected
7	1/4 mile-northwest	-	Lynwood	TCE, PCE, 1,1-DCE
13	1/2 mile-southwest	-	Silverado	PCE
14	1/2 mile southwest	745-767	Silverado	PCE
18	1/2 mile-southwest	600-758	Silverado	PCE
19	1/2 mile-southwest	610-746	Silverado	PCE
23	1/4 mile-southeast	530-798	Lynwood & Silverado	PCE
25	1/2 mile-east-southeast	-	Exposition & Gage	TCE, PCE

Based on groundwater monitoring data from the former Dial Corporation facility, located across Rayo Avenue, just east of the Subject Property, groundwater flows in a southerly direction at a gradient of approximately 0.003 feet/foot. The depth to groundwater in two monitoring wells located along Rayo Avenue ranged from about 45 to 55 feet below ground surface from April 1992 to April 1995 (see wells DIAL MW-4 and DIAL MW-5 on Figure 2). One well on the Dial Corporation site was found to have shallower perched groundwater (data in this paragraph were taken from EMCON, 1995).

6. SUMMARY

The principal objectives of this investigation were to determine if VOCs detected in samples of soil collected at the property owned by the Jervis B. Webb Co. in South Gate, California are also present in groundwater beneath the Site and to estimate the direction of groundwater flow beneath the Site. During previous investigations at the Subject Property, TCE and PCE were detected at maximum concentrations of 270 mg/kg and 140 mg/kg, respectively, in samples of soil collected near the clarifier and former anodizing operations at the Site. The groundwater investigation documented in this report included installation and sampling of three on-site groundwater monitoring wells, sampling of two off-site groundwater monitoring wells, and additional characterization of subsurface soil at the Subject Property.

Three groundwater monitoring wells were installed at the Subject Property on 24 and 25 February 1998. The wells are screened in the groundwater table aquifer beneath the Site at depths ranging from 40 ft bgs to 70 ft bgs. The greatest depth of investigation at the Subject property thus far is 73 ft bgs.

Samples of soil were collected from the soil borings drilled for installation of the new groundwater monitoring wells for chemical analysis and characterization of soil. Nine samples of soil were collected from soil borings MW-1, MW-2, and MW-3 at depths of approximately 10 ft bgs, 20 ft bgs, and 30 ft bgs and submitted to an analytical laboratory for analysis of VOCs. PCE and TCE were detected in soil samples collected from soil boring MW-1 at maximum concentrations of 23 ug/kg and 62 ug/kg, respectively. No analytes were detected above method detection limits in the soil samples collected from soil borings MW-2 and MW-3.

Soil present in the vadose zone beneath the Subject Property is predominantly composed of silt with variable clay and sand content. However, predominantly clayey and sandy soils are also present. The vadose zone is characterized by interbedded clay, silt, and sand layers, some of which may be continuous throughout the investigation area.

The depth to groundwater in on-site monitoring wells MW-1, MW-2 ,and MW-3 was measured on 27 February, 2 and 4 March, 8 April, and 20 May 1998. The depth to groundwater in the on-site wells ranged from approximately 43.5 ft bgs to 44.8 ft bgs. The depth to groundwater measurements was also measured in off-site monitoring wells DIAL MW-4 and DIAL MW-5 on 20 May 1998. As inferred from the groundwater elevation data, the direction of groundwater flow in the groundwater table aquifer beneath the Subject Property appears to be primarily toward the southeast. The elevation of the groundwater table at wells MW-1, MW-2, and MW-3 increased an average distance of 0.7 feet from 27 February 1998 through 20 May 1998.

Following development and purging, samples of groundwater were collected from monitoring wells MW-1, MW-2, and MW-3 on 4 March and 20 May 1998. Samples of groundwater were collected from monitoring wells DIAL MW-4 and DIAL MW-5 on 20 May 1998 (note that these wells were purged, but not re-developed prior to sampling). Although several VOCs were detected in the samples of groundwater collected on 4 March and 20 May 1998, TCE was the predominant VOC detected in each sample. The maximum concentrations of TCE detected in the samples of groundwater collected from on-site monitoring wells MW-1, MW-2, and MW-3 on 4 March 1998 were 25,000 ug/L, 3,000 ug/L, and 2,800 ug/L, respectively. The concentrations of TCE detected in the samples of groundwater collected from the off-site monitoring wells DIAL MW-4 and DIAL MW-5 were 16 ug/L and 28 ug/L, respectively. The chemical analyses performed on the samples of groundwater collected on separate dates from the on-site monitoring wells MW-1, MW-2, and MW-3 provided similar results.

In addition to TCE, PCE, cis and trans 1,2-DCE, 1,1-DCE, 1,1-DCA, and toluene were detected in the samples of groundwater collected from on-site wells MW-1, MW-2, and MW-3. In each sample of groundwater collected from the on-site monitoring wells, the concentrations of these additional chemicals that were detected were generally at least a factor of ten lower than the concentration of TCE detected in the same sample.

The chemical signatures of the samples of groundwater collected from the off-site monitoring wells, DIAL MW-4 and DIAL MW-5, were somewhat different than the chemical signatures of the samples of groundwater collected from the on-site wells in that:

- PCE, 1,1-DCE, and 1,1-DCA were not detected in the samples collected from the off-site monitoring wells, and
- benzene, xylenes, and 1,2-DCA were detected in the samples of groundwater collected from the off-site wells, but were not detected in any of the samples collected from the on-site monitoring wells.

The concentrations of TDS detected in the samples of groundwater collected from on-site monitoring wells MW-1, MW-2, and MW-3 ranged from 1,100 mg/L to 2,500 mg/L. The concentrations of TDS detected in the samples of groundwater collected from off-site monitoring wells DIAL MW-4 and DIAL MW-5 were 1,300 mg/L and 6,300 mg/L, respectively.

The results of this investigation indicate that several VOCs can be detected in samples of groundwater collected from three monitoring wells at the Subject Property. The elevated concentrations of TCE and PCE detected in samples of soil and groundwater collected near the clarifier and former anodizing areas of the Subject Property suggest that these chemicals may have been released on this portion of the property. However, the elevated concentrations of TCE detected in samples of groundwater collected from monitoring well MW-2 and the location of this well on the inferred up-gradient portion of the Subject property suggest that additional sources of the TCE detected in groundwater may exist to the

north of the Subject Property. In addition, the somewhat different chemical signatures of the samples of groundwater collected at the Subject Property versus those collected from the monitoring wells located off-site along Rayo Avenue suggests that the sources of chemicals detected in the samples collected from the off-site wells may not yet be completely identified.

4. RESULTS OF SOIL SAMPLING AND ANALYSIS

4.1. Characterization of Soil

Soil present in the vadose zone beneath the Subject Property is predominantly composed of silt with variable clay and sand content. However, predominantly clayey and sandy soils are also present. The vadose zone is characterized by interbedded clay, silt and sand layers, some of which may be continuous throughout the investigation area.

The sediments observed at the Subject Property may be correlated with the Downy Plain alluvium as discussed in Section 2. Given the reported nature of deposition for the Downey Plain Alluvium, i.e., stream channel and overbank splay deposits associated with the Quarternary fluctuations of Los Angeles River, it is possible that the soil stratigraphy observed at the Subject Property is variable laterally as well as vertically in the immediate vicinity of the property.

Several recognizable soil layers were observed to be present in soil borings MW-1, MW-2, and MW-3. These soil types were also observed in soil borings logged during EKI's previous investigations at the Subject Property in December 1997 (see the Phase II Soil Report). In soil borings MW-1, MW-2, and MW-3, a moderately to highly plastic clay unit approximately 4 feet in thickness was observed at depths ranging from approximately 20 to 26 ft bgs. This unit was also observed in variable thicknesses in soil borings B15 through B19, completed at the Subject Property in December 1997. This clay unit is overlain and underlain by silty soil in soil borings MW-1, MW-2, and MW-3, and B15 through B19.

A pronounced sandy unit previously observed in soil borings B15 through B19 at a depth of approximately 34 to 36 ft bgs was also observed in soil borings MW-1, MW-2, and MW-3 at depths ranging from 35 to 37 ft bgs. This unit was observed to vary in thickness from approximately 3 to 5 feet in soil borings MW-1, MW-2, and MW-3. A second, more pronounced sandy unit was observed at depths near 65 ft bgs in soil borings MW-1 and MW-2 and near 60 ft bgs in soil boring MW-3. The lower contact of this sandy unit was not observed within the total depth (73 ft bgs) of sampling at each location (see Appendix A).

4.2. Analytical Results for Soil

Samples of soil collected on 24 and 25 February 1998 were analyzed by Orange Coast Analytical, Inc. ("Orange Coast") of Tustin, California for VOCs using U.S. Environmental Protection Agency ("EPA") Method 8010. Nine samples of soil were collected from soil borings MW-1, MW-2, and MW-3 at depths of approximately 10 ft bgs, 20 ft bgs, and

30 ft bgs and submitted to Orange Coast for analysis. The analytical results for the chemical analyses of soil samples are summarized in Table 2. Chain-of-Custody forms and laboratory reports for the soil samples are attached in Appendix B.

The results of chemical analyses of soil samples collected from soil borings MW-1, MW-2, and MW-3 indicate that PCE and TCE were the only analytes detected at concentrations above method detection limits in these samples. PCE and TCE were detected in soil samples collected from soil boring MW-1 at maximum concentrations of 23 micrograms per kilogram ("ug/kg") and 62 ug/kg, respectively. No analytes were detected above method detection limits in the soil samples collected from soil borings MW-2 and MW-3.

4.2.1. Quality Assurance/Quality Control for Soil Chemical Analyses

Standard laboratory QA/QC procedures used for the project included method blanks and matrix spikes/matrix spike duplicates. Percent recovery of matrix spikes and matrix spike duplicates were within acceptable ranges. No analytes were detected in the method blanks analyzed for the project. QA/QC results are provided with the laboratory reports in Appendix C.

5. RESULTS OF WELL GAUGING AND GROUNDWATER ANALYSES

5.1. Measurements of Groundwater Elevation

The depth to groundwater in monitoring wells MW-1, MW-2 ,and MW-3 was measured on 27 February, 2 and 4 March, 8 April, and 20 May 1998. The depth to groundwater measurements was also measured in monitoring wells DIAL MW-4 and DIAL MW-5 on 20 May 1998. These data are provided in Table 3. Contours representing the elevation of the groundwater table on 20 May 1998 are shown on Figure 3.

As inferred from the contours of groundwater elevation shown on Figure 3, the direction of groundwater flow in the groundwater table aquifer beneath the Subject Property is primarily toward the southeast. Using the data in Table 3, the elevation of the groundwater table at wells MW-1, MW-2, and MW-3 increased an average distance of 0.7 feet from 27 February 1998 through 20 May 1998.

As noted in Table 3, the top-of-casing elevations of the reference points used by EKI for gauging depth to water at the Dial wells were not surveyed by Rattray on 6 March 1998. However, based on measurements conducted in the field and survey data for the tops of the well box lids for DIAL MW-4 and DIAL MW-5, approximate top-of-casing reference point elevations have been calculated.

5.2. Analytical Results for Groundwater Samples

Samples of groundwater were collected from monitoring wells MW-1, MW-2, and MW-3 on 4 March and 20 May 1998. Samples of groundwater were collected from monitoring wells DIAL MW-4 and DIAL MW-5 on 20 May 1998. In addition, a duplicate sample of groundwater was collected from well MW-1 during the sampling event on 4 March 1998. All samples of groundwater were submitted to Orange Coast for chemical analyses. The samples collected on 4 March 1998 were analyzed for VOCs using EPA Method 8260. The samples collected on 20 May 1998 were analyzed by Orange Coast for VOCs using EPA Method 8260 and for total dissolved solids ("TDS") using EPA Method 160.1. The analytical results for groundwater samples collected during this investigation are summarized in Table 4. Concentrations of TCE detected in groundwater samples are shown on Figure 2. Chain-of-Custody forms and laboratory reports are attached in Appendix D.

Although several VOCs were detected in the samples of groundwater collected on 4 March and 20 May 1998, TCE was the predominant VOC detected in each sample. The maximum

concentrations of TCE detected in the samples of groundwater collected from on-site monitoring wells MW-1, MW-2, and MW-3 on 4 March 1998 were 25,000 ug/L, 3,000 ug/L, and 2,800 ug/L, respectively. The concentrations of TCE detected in the samples of groundwater collected from the off-site monitoring wells DIAL MW-4 and DIAL MW-5 were 16 ug/L and 28 ug/L, respectively. The chemical analyses performed on the samples of groundwater collected on separate dates from the on-site monitoring wells MW-1, MW-2, and MW-3 provided similar results.

In addition to TCE, PCE, cis and trans 1,2-dichloroethene ("cis and trans 1,2-DCE"), 1,1-dichloroethene ("1,1-DCE"), 1,1-dichloroethane ("1,1-DCA"), and toluene were detected in the samples of groundwater collected from on-site wells MW-1, MW-2, and MW-3. In each sample of groundwater collected from the on-site monitoring wells, the concentrations of these additional chemicals that were detected were generally at least a factor of ten lower than the concentration of TCE detected in the same sample.

The chemical signatures of the samples of groundwater collected from the off-site monitoring wells, DIAL MW-4 and DIAL MW-5, were somewhat different than the chemical signatures of the samples of groundwater collected from the on-site wells in that:

- PCE, 1,1-DCE, and 1,1-DCA were not detected in the samples collected from the off-site monitoring wells, and
- benzene, xylenes, and 1,2-dichloroethane ("1,2-DCA") were detected in the samples of groundwater collected from the off-site wells, but were not detected in any of the samples collected from the on-site monitoring wells.

The concentrations of TDS detected in the samples of groundwater collected from on-site monitoring wells MW-1, MW-2, and MW-3 ranged from 1,100 mg/L to 2,500 mg/L. The concentrations of TDS detected in the samples of groundwater collected from off-site monitoring wells DIAL MW-4 and DIAL MW-5 were 1,300 mg/L and 6,300 mg/L, respectively.

5.2.1. Quality Assurance/Quality Control for Soil Chemical Analyses

Standard laboratory QA/QC procedures used for the project included analysis of method blanks and matrix spikes/matrix spike duplicates. Percent recovery of matrix spikes and matrix spike duplicates was within acceptable ranges. No analytes were detected in the method blank samples analyzed for this project. QA/QC results are provided with the laboratory reports in Appendix D.

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98 OCT 26 PM 1:13
QUALITY CONTROL BOARD
LOS ANGELES REGION

21 October 1998

Ms. Ana Veloz-Townsend
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Transmittal of Results for Additional Groundwater Investigation and Proposed Well Installation at the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate, California (RWQCB SLIC File No. 744; EKI 961025.02)

Dear Ms. Veloz-Townsend:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to transmit this summary of results for the recent groundwater investigation and proposal for well installation at the Jervis B. Webb Company property located at 5030 Firestone Boulevard in South Gate ("Site"). The additional groundwater investigation activities were performed in accordance with EKI's, *Project Tasks, Schedule, and Work Plan for Additional Groundwater Investigation and Quarterly Groundwater Monitoring at the Jervis B. Webb Company Property* ("Sampling Plan"), dated 29 September 1998.

Results of PIPP Groundwater Sampling and CPT Investigation

On 1 and 2 October 1998, Holguin, Fahan & Associates, Inc. ("HFA") completed direct-push sampling of groundwater at nine soil boring locations at the Webb property and Reliable Steel Building Products, Inc. ("Reliable Steel") property located at 9301 Rayo Avenue. Samples of groundwater were collected at each location using a Push-in-Plastic-Piezometer ("PIPP"). At one location (CPT-1), groundwater samples were collected at two depths. The locations of these CPT borings are shown on Figure 1, attached. The results of laboratory analyses of groundwater samples are summarized in Table 1.

As proposed in the Sampling Plan, a complete report describing the CPT investigation will be incorporated into a report describing the well installation and quarterly groundwater monitoring activities. This report will be submitted to the RWQCB by 15 December 1998.

Well Installation and Development

We propose to install two new groundwater monitoring wells on the Reliable Steel property. The proposed locations of these wells are shown on Figure 1. In accordance with the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") letter to Webb dated 4 September 1998, one well (MW-4) will be installed at the south end of the groundwater investigation area, near Rayo Avenue. We also propose to install a well (MW-5) at the northeastern corner of the Reliable Steel Property (see Figure 1).

We currently plan to complete well installation during the last week of October 1998. Well development and groundwater sampling are planned for the first and second weeks of November 1998. Quarterly groundwater monitoring will include sampling of groundwater from the three existing wells at the Site (MW-1 through MW-3) and the two proposed wells.

Please call if you have any questions or comments regarding the above.

Very truly yours,

ERLER & KALINOWSKI, INC.

Steven G. Miller, P.E.
(CE, Cert. 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company

TABLE 1
PIPP Groundwater Detections

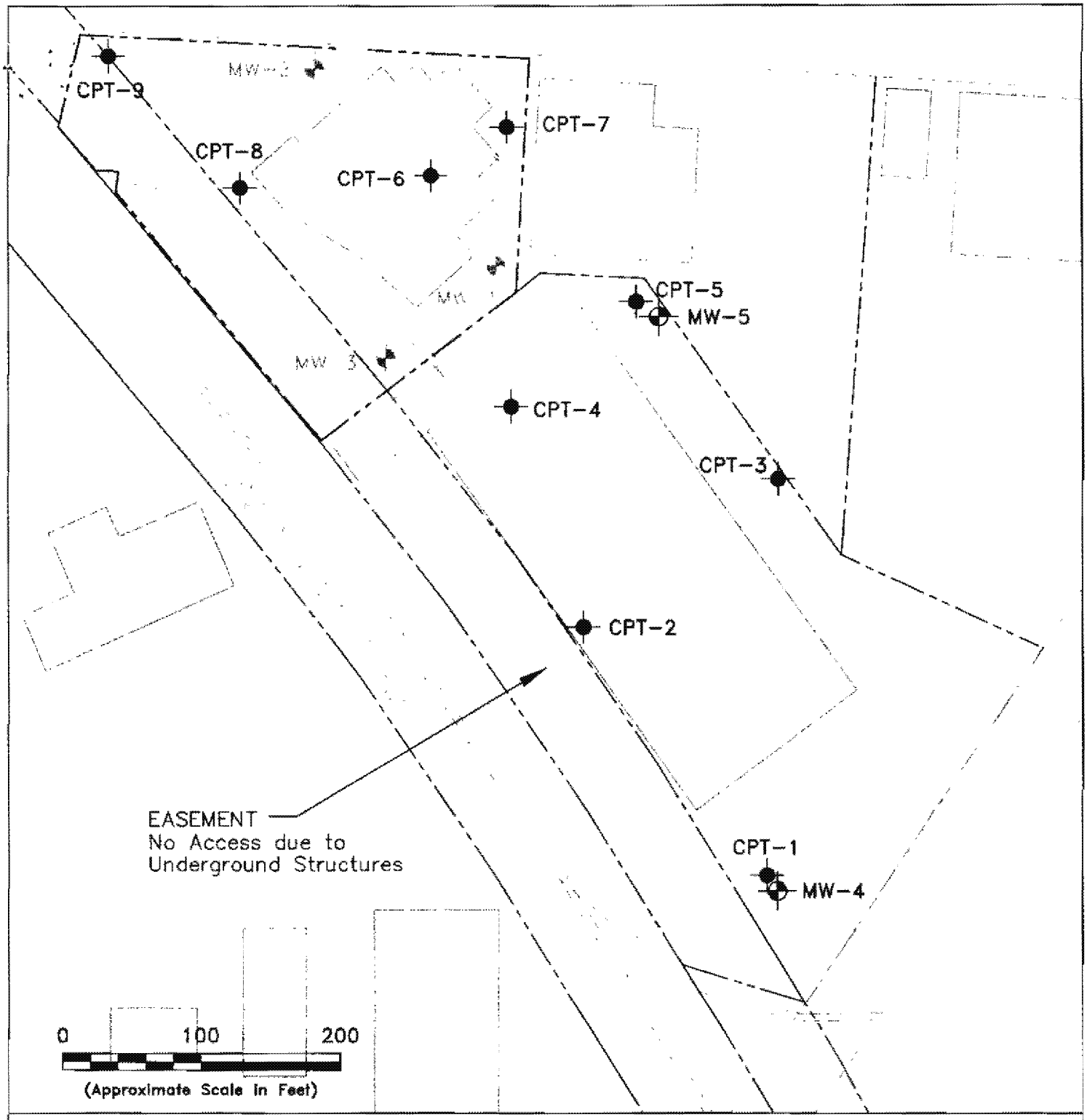
Jervis B. Webb Company
5030 Firestone Boulevard
South Gate, California

PIPP Location	Sample Date	Depth (ft bgs)	Volatile Organic Compounds - EPA Method 8260 (ug/L)											
			Acetone	Ben	1,1-DCA	1,2-DCA	1,1-DCE	c-1,2-DCE	t-1,2-DCE	MEK	PCE	TCE	Tol	Xylenes
CPT-1	10/1/98	55	**170**	**1.6**	<0.5	<0.5	<0.5	<0.5	<0.5	**4.6**	<0.5	<0.5	<0.5	**1.6**
CPT-1	10/1/98	95	**8.1**	<0.5	<0.5	**5.3**	<0.5	<0.5	<0.5	<1	<0.5	<0.5	<0.5	<0.5
CPT-2	10/1/98	55	**300**	<1	<1	<1	<1	<1	<1	**3.5**	<1	**1.6**	**1.1**	<1
CPT-3	10/1/98	55	**170**	**0.58**	<0.5	<0.5	<0.5	**2.6**	<0.5	**2.7**	<0.5	**6.3**	**0.55**	**0.66**
CPT-4A	10/1/98	55	**95**	<1	**1.2**	<1	**4.1**	**11**	<1	**2.2**	<1	**220**	**1.1**	**1.2**
CPT-4B	10/1/98	55	**80**	<1	**1.1**	<1	**3.4**	**10**	<1	**8.4**	<1	**200**	<1	<1
CPT-5	10/1/98	55	**480**	<13	<13	<13	<13	**110**	<13	<25	<13	**3,800**	<13	<13
CPT-6	10/2/98	55	<400	<100	**240**	<100	<100	**130**	<100	<200	**110**	**35,000**	<100	<100
CPT-7	10/2/98	55	<500	<125	**160**	<125	<125	**190**	<125	<250	<125	**27,000**	<125	<125
CPT-8	10/2/98	55	**16**	<0.5	**1.4**	<0.5	**6.7**	**11**	**1.3**	<1	<0.5	**140**	<0.5	<0.5
CPT-9	10/2/98	55	**490**	<1	<1	<1	<1	<1	<1	**7.7**	<1	**9.1**	<1	<1

NOTES: Abbreviations:

PIPP = Push-In Plastic Piezometer
ft bgs = feet below ground surface
ug/L = micrograms per liter
Ben = Benzene
1,1-DCA = 1,1-Dichloroethane
1,2-DCA = 1,2-Dichloroethane
1,1-DCE = 1,1-Dichloroethene
1,2-DCE = 1,2-Dichlorothene (total)
c-1,2-DCE = cis-1,2-Dichloroethene
t-1,2-DCE = trans-1,2-Dichloroethene
MEK = Methyl ethyl ketone (2-butanone)
PCE = Tetrachloroethene
TCE = Trichloroethene
Tol = Toluene
Xylenes = Total xylenes

1. Sample CPT-4B is a duplicate of sample CPT-4A.
2. All results shown are in units of micrograms per liter (ug/L).



LEGEND

- Location of CPT Boring Installed on 10/1 and 10/2/98
- Proposed Groundwater Monitoring Well Location
- Existing Groundwater Monitoring Well

Notes:

1. All locations are approximate.

Erler & Kalinowski, Inc.

Site Map Showing Locations of CPT Borings and Proposed Groundwater Monitoring Wells

Jervis B. Webb Company
South Gate, CA

October 1998
EKI 961025.02

Figure 1

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

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September 29, 1998

Ms. Ana Veloz-Townsend
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Project Tasks, Schedule, and Work Plan for Additional Groundwater Investigation and Quarterly Groundwater Monitoring at the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate, California (RWQCB SLIC File No. 744; EKI 961025.02)

Dear Ms. Veloz-Townsend:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to submit this project schedule and work plan for additional groundwater investigation and quarterly groundwater monitoring at the Jervis B. Webb Company property located at 5030 Firestone Boulevard in South Gate ("Site"). This schedule and work plan have been prepared in response to the requirement for submittal of a sampling plan as set forth in the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") letter to Webb dated September 4, 1998.

PROJECT TASKS AND SCHEDULE

During the next three months, Webb proposes to complete the following tasks:

Task 1 - Additional Groundwater Investigation

The planned additional groundwater investigation consists of a direct-push sampling of groundwater followed by the installation of one or more groundwater monitoring wells. The plan for this work is presented herein below. The target completion date for field and laboratory activities is October 30, 1998. A report describing the results of these investigations will be incorporated into a report with the results of the first quarterly groundwater monitoring. The target date for submittal of this combined report to the RWQCB is December 15, 1998.

Task 2 - Quarterly Groundwater Monitoring

Quarterly groundwater monitoring will include sampling of groundwater from the three existing wells on the Site and new well(s) installed during the additional groundwater investigation. The plan for this work is described below. The first quarter of groundwater monitoring will be performed after completion of the additional groundwater investigation (Task 1) and is currently planned for the first half of November 1998. Thereafter, depth to groundwater measurements will be measured monthly and groundwater sampled and analyzed quarterly at each of Webb's monitoring wells. Depending on sampling results, we may propose to modify the frequency of monitoring activities after the initial two quarters of sampling.

Task 3 - Work Plan for Soil Remediation

EKI will prepare a Work Plan for remediation of soil impacted with volatile organic compounds ("VOCs"). This plan will be submitted to the RWQCB by December 15, 1998. Prior to completion of the plan, Webb proposes to engage a contractor to remove the inactive clarifier at the Site. Clarifier removal is tentatively planned for November 1998. Findings from removal of the clarifier will be presented in the Work Plan for Soil Remediation.

WORK PLAN FOR TASK 1 - ADDITIONAL GROUNDWATER INVESTIGATION

Task 1a – PIPP Groundwater Sampling and CPT Investigation

EKI will subcontract with Holguin, Fahan & Associates, Inc. ("HFA") for completion of direct-push sampling of groundwater at eight locations at the Site. HFA will use its Push-in-Plastic-Piezometer ("PIPP") sampling method to collect groundwater samples near the water table at each location. Subsurface lithologic data will be obtained using Cone Penetrometer Testing ("CPT") at most of these boring locations. At one or more locations, CPT testing will continue to the depth of refusal for the CPT rig to obtain deep lithologic data and to allow collection of a deep grab groundwater sample. Groundwater samples will be analyzed for VOCs using EPA Method 8260.

Task 1b - Well Installation and Development

At least one monitoring well will be installed as required by the RWQCB. This well will be located at the south end of the groundwater investigation area, near Rayo Avenue, as shown on Figure 1. Based on the results of the grab groundwater sampling and analysis in Task 1, Webb may decide to install additional groundwater monitoring well(s) in some of the PIPP groundwater sampling locations. A determination will be made after review of the PIPP investigation results.

Underground Service Alert (Dig Alert) has been notified of the proposed boring locations and subsurface geophysical surveys for underground utilities have already been completed at the Site. Well installation will be performed by West Hazmat Drilling Corporation ("West Hazmat") of Anaheim, California using a hollow-stem auger. Well construction will be performed in accordance with applicable guidelines of the State of California Department of Health Services.

Soil samples will be collected at intervals of approximately five feet from ground surface to the depth of first encountered groundwater at each boring location. The estimated total depth of drilling will be about 70 feet below ground surface ("ft bgs") at each boring. Lithologic classification of soil samples will be logged using the Unified Soil Classification System. The soil samples also will be screened for organic vapors using a field headspace test utilizing a photo-ionization detector.

The groundwater monitoring well(s) will be constructed of 4-inch outer diameter, Schedule 40 PVC casing with 30 feet of slotted screen and a bottom cap. The well(s) will have a 0.010-inch slot-size screen and No. 1C Lone Star sand (or equivalent) will be used for constructing the filter pack in the annular space around the screen. The screen of each well will be positioned approximately 5 feet above the groundwater table to 25 feet below the groundwater table. The filter pack will extend from well bottom to 1.5 to 2 feet above the top of the screen. A 3 to 5 feet thick transition seal consisting of bentonite pellets will be emplaced above the sand pack and hydrated in place. The remainder of each well annulus will be sealed with high-solids bentonite grout from the top of the transition seal to approximately 3 to 5 ft bgs. The top of each well annulus will be sealed with concrete and a traffic box will be installed over the well. Each traffic box will be slightly raised above the surrounding grade to minimize the potential for surface water entering the well. The top of the well casing will be fitted with an expansion cap and locking mechanism.

West Hazmat will perform well development approximately two days following well installation. Well development will be performed in accordance with applicable guidelines of the State of California Department of Health Services. Development will consist of block surging and bailing or pumping. During development, field measurements of pH, temperature, conductivity, and turbidity will be recorded. Development will continue until these parameters appear to stabilize. The new well(s) will be sampled for the first time as part of the first quarterly sampling event.

Downhole drilling and sampling equipment will be decontaminated before each use and at the conclusion of the project. Drilling wastes, development water, and decontamination wastes will be contained in DOT approved 55-gallon drums. These wastes will be temporarily stored on-site pending determination of an appropriate off-site disposal method by Webb.

Following well installation, reference elevations at each groundwater well will be surveyed by Rattray Associates, Inc. of Santa Ana, California. Well surveying will provide a ground surface reference elevation at each well location and the elevation of a top-of-casing reference mark on each well casing.

Task 1c - Report Preparation

EKI will prepare a written report combining the findings of the additional groundwater investigation with the results of the first quarter of groundwater monitoring which is described below. This report will describe observations during the investigation and will include summary tables and graphics, boring and well construction logs, and laboratory reports.

WORK PLAN FOR TASK 2 - QUARTERLY GROUNDWATER MONITORING

Task 2a – Monthly Groundwater Level Measurements

EKI will measure the depth to groundwater in monitoring wells at the Site on approximately a monthly schedule. The depth to groundwater will be measured with an electronic water-level indicator.

Task 2b – Quarterly Collection and Analysis of Groundwater Samples

Before sampling, each well will be purged using an electric submersible pump. A minimum of three well volumes of groundwater will be removed from each well. Well purging will be performed by West Hazmat or other subcontractor. During purging, field measurements of pH, temperature, conductivity, and turbidity will be recorded. Purge water will be contained in DOT approved 55-gallon drums for handling with other investigation-derived wastes.

Groundwater samples will be collected from each well by EKI using a bottom emptying Teflon bailer or disposable bailer. For quality-control purposes, one equipment rinsate blank and one duplicate sample will be collected each quarter. Samples will be contained in 40 milliliter glass bottles. Samples will be labeled with a unique identification number, date and time, placed on ice in a cooler, and transported with chain-of-custody documentation to a laboratory certified by the State of California Department of Health Services. Groundwater samples will be analyzed for VOCs using EPA Method 8260.

Task 2c - Report Preparation

As indicated above, the results of the first quarterly monitoring of groundwater will be presented in a report with the findings of the additional groundwater investigation. For subsequent quarterly monitoring events, a report summarizing the results of groundwater-level

measurements and groundwater sampling and analysis will be prepared and submitted to the RWQCB.

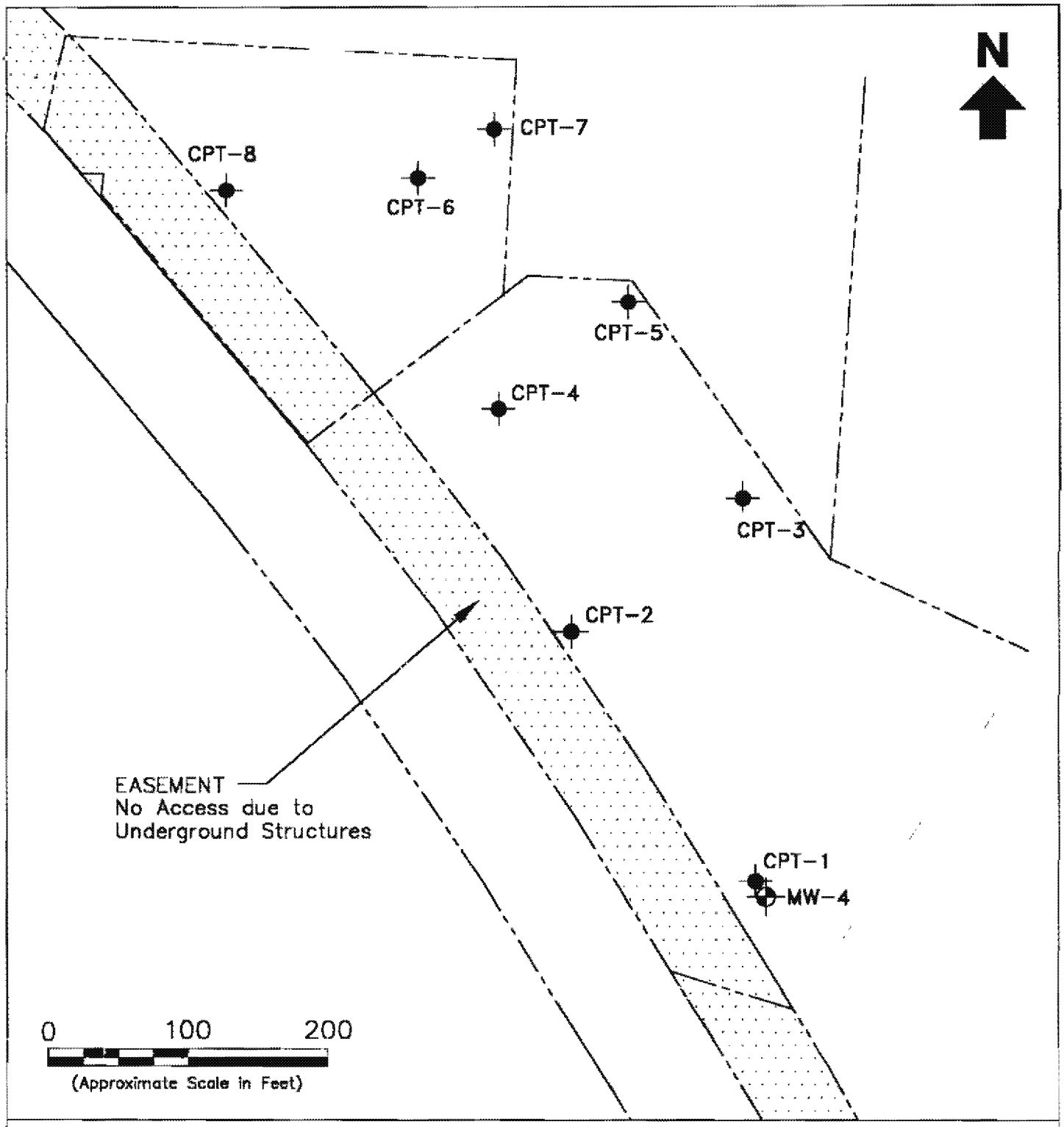
We look forward to your response to this plan.

Very truly yours,

ERLER & KALINOWSKI, INC.

Steven G. Miller, P.E.
(CE, Cert. 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company



LEGEND

Proposed CPT Testing and PIPP Groundwater Sampling Location

Proposed Groundwater Well Location

Notes:

1. All locations are approximate.
2. PIPP = Push-In Plastic Piezometer

Erler & Kalinowski, Inc.

Proposed Groundwater Sampling Locations

Jervis B. Webb Company
South Gate, California
September 1998
EKI 961025.03

Figure 1

California Regional Water Quality Control Board

Los Angeles Region

Peter M. Rooney
Secretary for Environmental Protection

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Phone (323) 266-7500 • FAX (323) 266-7600

Pete Wilson
Governor

September 4, 1998

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE - ADDITIONAL SITE ASSESSMENT ACTIVITIES (SLIC NO. 744)

We have received and reviewed your consultant's *"Phase II Groundwater Investigation Report"* dated June 30 1998, submitted for the above-referenced site. The report transmits the results from the most recent site assessment activities completed, which includes the results from the installation of the three groundwater monitoring wells and results from soil matrix and groundwater samples collected, from the three new wells and two off-site wells at the subject site.

Analyses of the soil matrix samples collected during previous phases of site assessment activities indicated that soil contaminated with volatile organic compounds (VOC) at concentrations exceeding our cleanup levels have been detected down to the groundwater table, and is considered a continuing threat to the underlying groundwater quality. Groundwater underlies the subject site at approximately 44 feet below ground surface. Analyses of the groundwater samples collected during this phase of site assessment activities from 3 on-site and 2 off-site groundwater monitoring wells have detected VOCs with maximum concentrations of 24,000 µg/L (TCE), 230 µg/L (cis-1,2-DCE) and 160 µg/L (1,1-DCE).

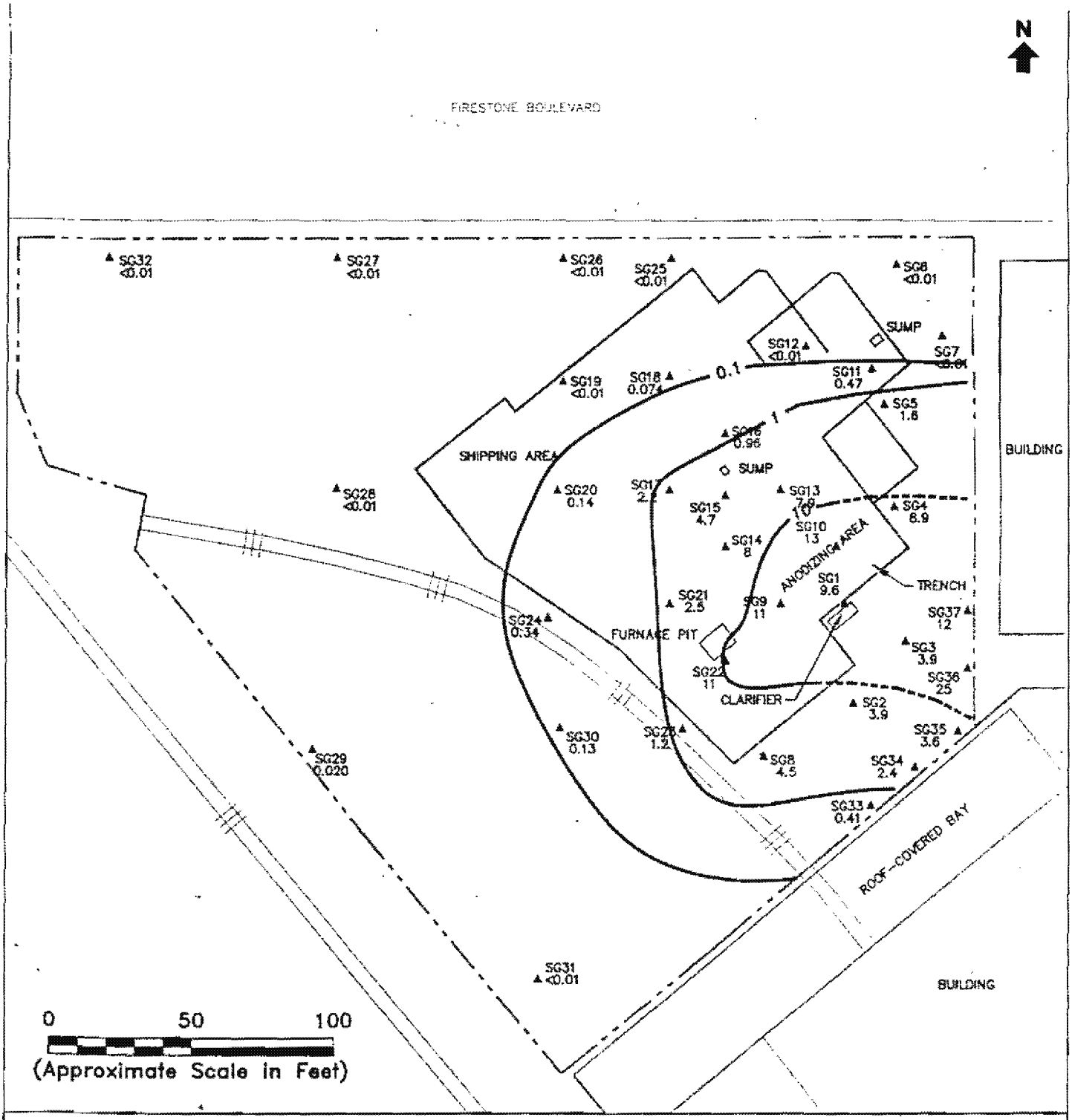
Based on the information submitted to date, we have determined that the concentrations detected in the underlying soil and groundwater exceed allowable levels and that the VOC contaminated soil is a continuing source of groundwater contamination and needs to be remediated. Regarding the groundwater, a quarterly groundwater sampling and monitoring program must be developed for all groundwater monitoring wells located at the subject site. Furthermore, additional groundwater data needs to be collected, primarily up and down-gradient of the source area in order to delineate the extent of the groundwater contamination plume. At a minimum, a groundwater monitoring well shall be installed down-gradient of the source area, preferably near where the former Dial wells were located, in order to monitor the condition of the plume migrating away from the site.

The sampling plan for an additional groundwater investigation, including a schedule for quarterly groundwater sampling and preparation of a workplan for soil remediation activities shall be submitted to this Regional Board by **September 30, 1998**, for our review. The need to remediate the underlying groundwater will be determined following the review and analysis of the additional groundwater data obtained from the well installation and quarterly groundwater sampling activities.

If you have any questions regarding this matter, please contact Ana Veloz-Townsend at (323) 266-7590.

J.E. ROSS, Unit Chief
Site Cleanup Unit

cc: Steven Miller, Erler & Kalinowski, Inc.



LEGEND

- ▲ SOIL GAS SAMPLING LOCATION
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

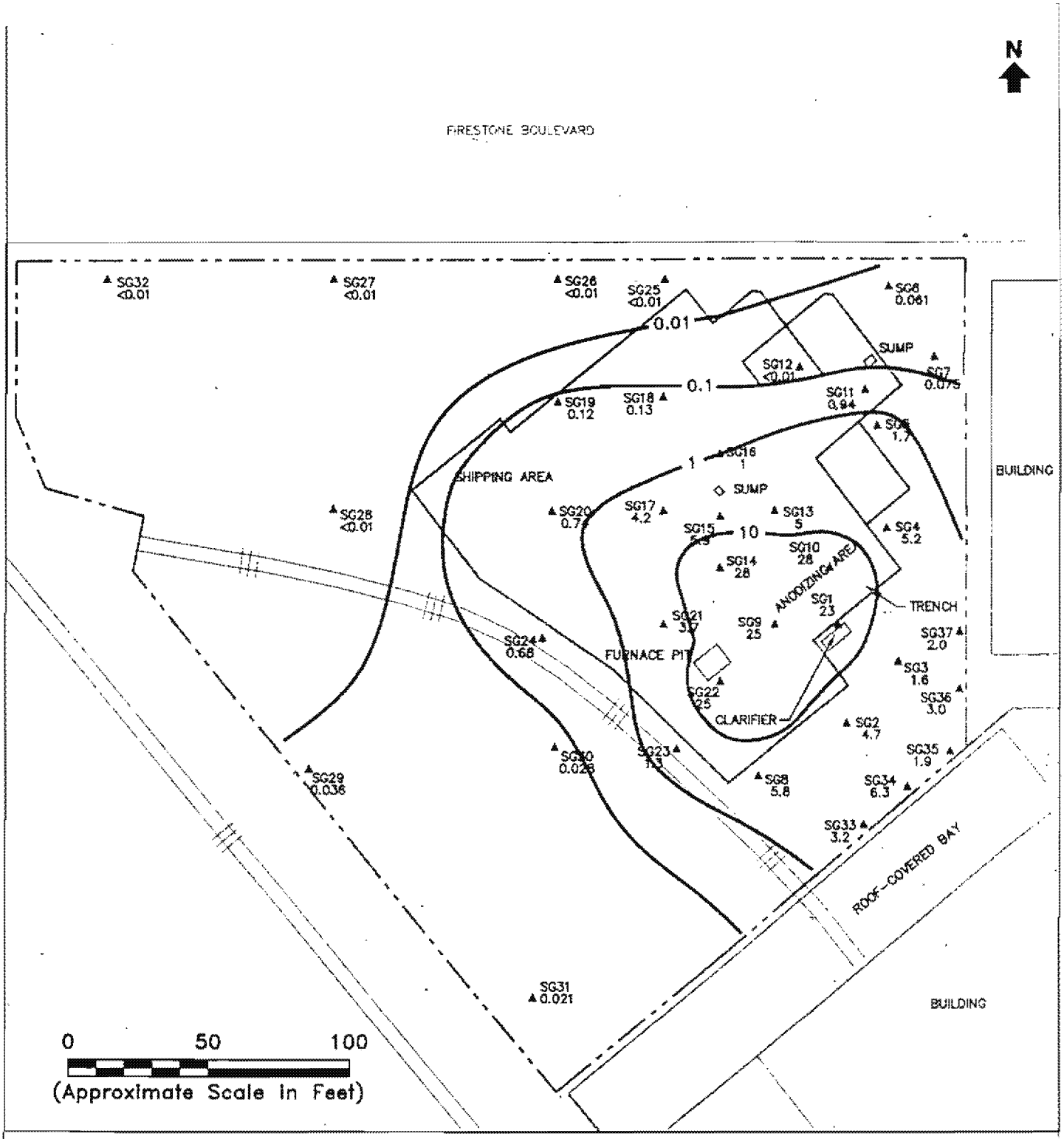
1. All locations are approximate.
2. Soil gas concentration contours in units of micrograms per liter by volume in air.

Erler & Kalinowski, Inc.

Concentrations of TCE Detected in Shallow Soil Gas

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02

Figure 4



LEGEND

- ▲ SOIL GAS SAMPLING LOCATION
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

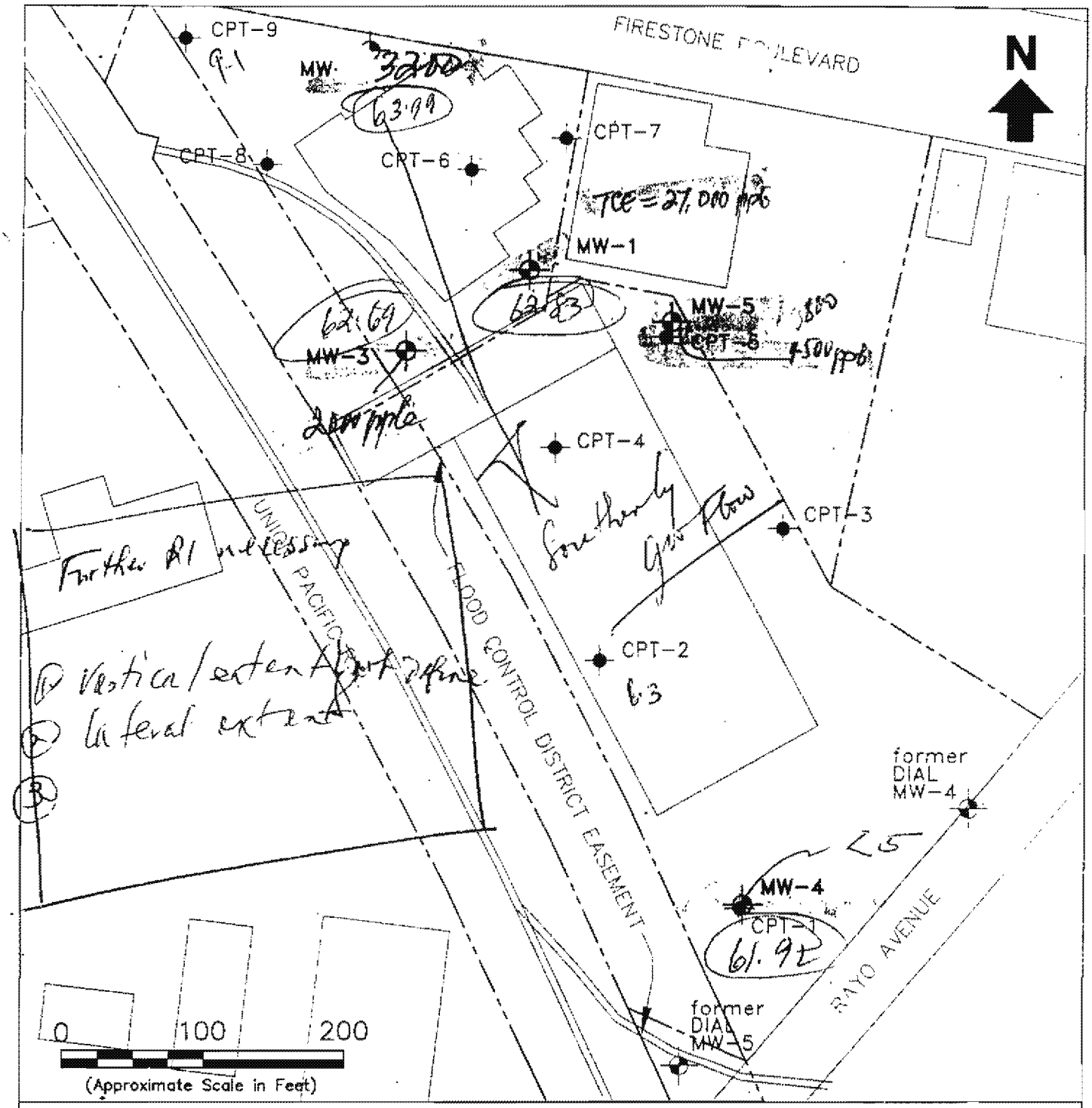
1. All locations are approximate.
2. Soil [illegible] concentration contours in units of [illegible] per liter by volume in air.

Erler & Kalinowski, Inc.

Concentrations of PCE Detected in Shallow Soil Gas

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02

Figure 5



LEGEND

MW-3	Groundwater Monitoring Well with Groundwater Elevation (msl)
	Former DIAL Monitoring Well
	PIPP Groundwater Sample Location
— - - —	Property Line/Boundary

Erler & Kalinowski, Inc.

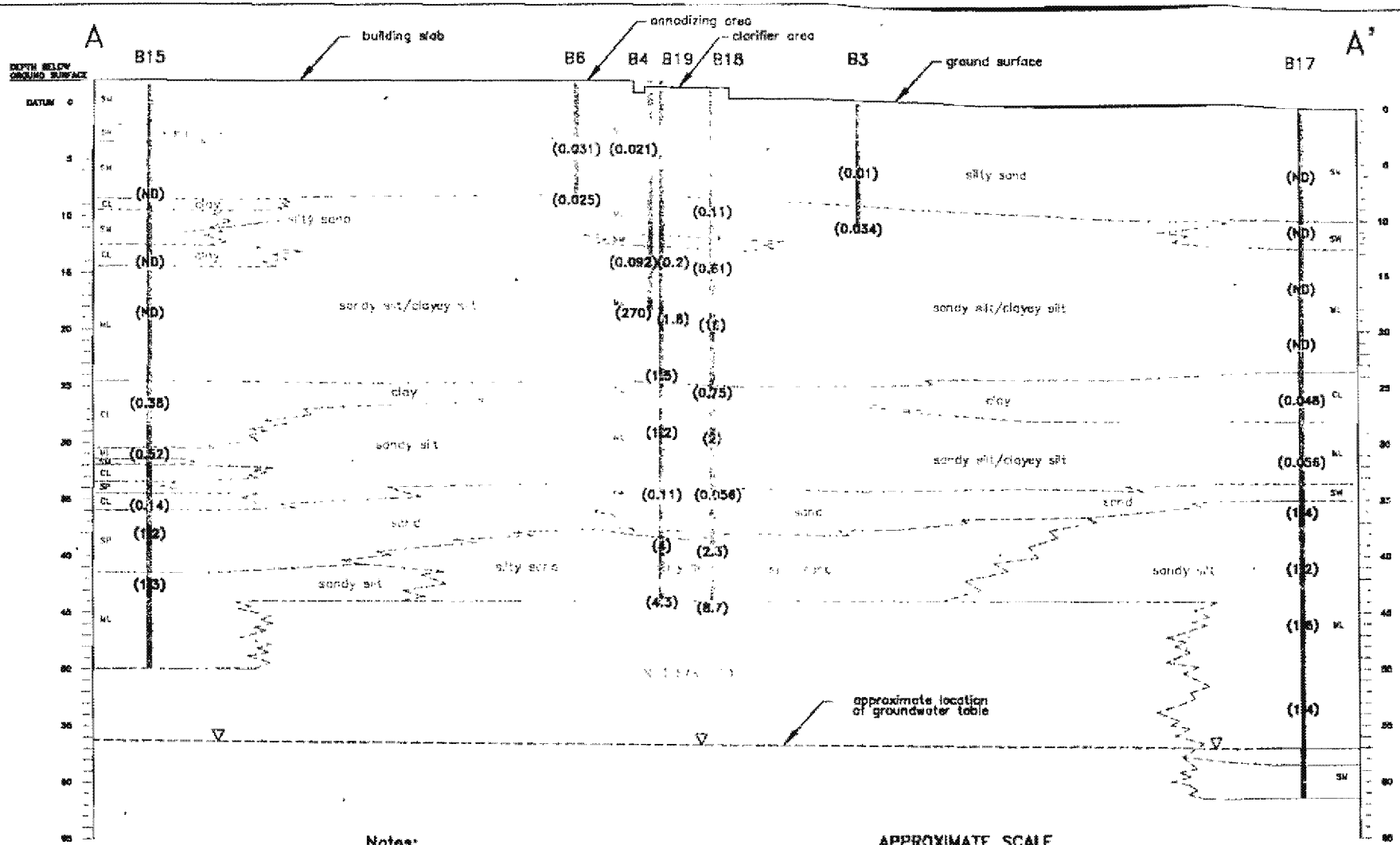
Monitoring Well Locations

Notes:

1. All locations are approximate.
2. Information related to PIPP groundwater sampling and monitoring at the former DIAL wells is provided in Additional Groundwater Investigation and Quarterly Monitoring Report, by Erler & Kalinowski, Inc., dated 13 January 1999 and Adjacent Property Review report, by Emcon Associates, dated 2 November 1995, respectively.

Jervis B. Webb Company
South Gate, California
June 1999
EKI 961025.02

Figure 2



LEGEND

(8.7)	Concentration of TCE Detected In Sample of Soil (depth of sample indicated)
———	Lithologic Contact
- - - -	Inferred Lithologic Contact
▽	Approximate Location of Static Groundwater Table
silty sand	General Soil Type
	USCS Soil Classification (see Appendix B)

Notes:

1. All locations are approximate.
2. All concentrations shown in units of milligrams per kilogram.
3. See Appendix B of the report for boring logs. See Table 2 for analytical results for soil samples.

APPROXIMATE SCALE

1 inch = 10 feet

Erler & Kalinowski,

Cr ss Section A – A'
Concentration o
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Jervis B
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EKI
n

California R gional Water Quality ontrol Board

Los Angeles Region

Peter M. Rooney
Secretary for Environmental Protection

Internet Address: http://www.swrcb.ca.gov
101 Centre Plaza Drive, Monterey Park, California 91754-2156
Phone (323) 266-7500 • FAX (323) 266-7600

Pete Wilson
Governor

August 25, 1998

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

ANNUAL ESTIMATION OF CHARGES FOR SLIC COST RECOVERY PROGRAM - JERVIS B. WEBB COMPANY, 5030 FIRESTONE BOULEVARD, SOUTH GATE, SLIC NO. 744 (PCA #204-2J)

Dear Mr. Stanesa:

The California Water Code (Porter-Cologne), Section 13304, allows the Regional Water Quality Control Board (Regional Board) to recover reasonable expenses from the responsible party for overseeing site investigation and cleanup of unregulated discharges adversely affecting waters of the State. It is our intent to continue to recovery such costs for regulatory oversight work conducted at this site in accordance with our initial Executive Officer letter dated February 2, 1998. In compliance with Assembly Bill 2507, this letter is being sent to provide you with the following information regarding cost for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.

2. A statement of the expected outcome of the estimated work.

3. The billing rates for all individuals and classes of employees expected to engage in the work or services.

4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Done

Board staff estimates the following work will be done for your site during the Regional Water Board's 1998/1999 fiscal year:

1. Review the recently submitted Phase II Groundwater Investigation Report dated June 30, 1998.

2. Review Quarterly Groundwater Monitoring and Sampling Reports, probable workplans for further groundwater investigation, soil and groundwater remediation activities and other project technical reports that may be necessary.

3. Attend meetings with representatives of Jervis Webb Company and conduct site inspections to observe implementation of work plans for additional soil and/or groundwater assessment and groundwater monitoring activities and provide written comments as necessary.

4. Conduct internal communications (i.e. meetings, memos, etc.) regarding the project.

Statement of Expected Outcome

During the Regional Board's 1997/1998 fiscal year, Board staff reviewed information for this site and approved the work plan to install groundwater monitoring wells and requested Jervis B. Webb to submit a report containing the results of the investigation activities. The following is the expected outcome of work that will be performed during the Regional Board's 1998/1999 fiscal year (which begins July 1, 1998):

1. Provide written comments on the June 30, 1998, report and request for a groundwater monitoring and sampling schedule.

2. Approval of the groundwater monitoring and sampling schedule.

3. Possible conceptual soil and groundwater remediation plans

4. Evaluate the completeness of the information submitted and provide written comments regarding the need to complete additional assessment and/or remediation activities.

Billing Rates

The attachment "Monthly Salary Scales by Job Classification" is provided for employees expected to engage in the work or services for your facility. The name and classification of employees making charges will be listed on invoices. The average billing rate is approximately $70 per hour.

Estimate of Expected Charges

Board staff expects to charge approximately 60 hours to your facility during the next fiscal year. Based on the average billing rate of $70 per hour, the estimated billing charge for the subject site is $4,200.

If you have any questions concerning the billing procedure, please contact Jim Ross, Site Cleanup Unit chief at (323) 266-7550 or Ana Veloz-Townsend at (323) 266-7590.

Sincerely,

Dennis A. Dickerson

DENNIS A. DICKERSON
Executive Officer

Enclosures

cc: Mr. Rick Remple, SWRCB, CWP

Erler & Kalinowski, Inc.
Consulting Engineers and Scientists
Santa Monica Business Park
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

19 February 1998

Mr. James Ross
Site Cleanup Unit
Los Angeles Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Transmittal of the Phase II Soil Investigation Report and Background Documents for the Jervis B. Webb Company Property at 5030 Firestone Boulevard South Gate, California (EKI 961025.02)

Dear Mr. Ross:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. is pleased to submit the enclosed Phase II Soil Investigation Report for the property at 5030 Firestone Boulevard in South Gate, California. As we discussed during our meeting on 6 February 1998, Webb requests your review of this investigation pursuant to its agreement with the Regional Water Quality Control Board under the Cleanup and Abatement Cost Recovery Program.

We have also enclosed some background information related to Webb's former property at 9301 Rayo Avenue. The enclosed letter and attachments addressed to Mr. Jim Hansen of the U.S. EPA Region IX, dated 16 January 1997, includes documents describing tank and sump closure work at that site.

We look forward to discussing the findings of the Phase II soil investigation with you. Please call with any comments of questions.

Very truly yours,

ERLER & KALINOWSKI, INC.

Steven G Miller, P.E. (Civil Engineer, Certificate 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company

98 FEB 19 PM 12:16
REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

Erler & Kalinowski, Inc.
Consulting Engineers and Scientists
Santa Monica Business Park
2951 28th Street, Suite 1020
Santa Monica, California 90405
(310) 314-8855
Fax (310) 314-8860

19 February 1998

Ms. Jenny Au
Site Cleanup Unit
Los Angeles Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, California 91754-2156

Subject: Proposed Groundwater Investigations at the Jervis B. Webb Company Property at 5030 Firestone Boulevard, South Gate in California (EKI 961025.02)

Dear Ms Au:

On behalf of the Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to submit this description of proposed groundwater investigations at 5030 Firestone Boulevard in South Gate, California ("Subject Property"). We have prepared this plan pursuant to discussions during our meeting with Mr. Jim Ross and you on 6 February 1998.

SCOPE OF WORK

We propose to install, develop, and sample three groundwater monitoring wells at the Subject Property. These wells will be screened at the static groundwater table, which was encountered at approximately 57 feet below ground surface ("ft bgs") at the site during EKI's October 1997 soil investigation at the Subject Property. The proposed locations are as shown on Figure 1. Underground Service Alert (Dig Alert) has been notified of the proposed boring locations and subsurface geophysical surveys for underground utilities have already been completed at the Subject Property.

Task 1 - Well Installation. Well installation will be performed by West Hazmat Drilling Corporation ("West Hazmat") of Anaheim, California using a hollow-stem auger. Well construction will be performed in accordance with applicable guidelines of the State of California Department of Health Services and Environmental Protection Agency.

Soil samples will be collected at intervals of approximately five feet from ground surface to the depth of first encountered groundwater at each boring location. The estimated total depth of drilling will be about 70 ft bgs at each boring. Lithologic classification of soil samples will be logged using the Unified Soil Classification System. The soil samples also will be screened for organic vapors using a field headspace test utilizing a photoionization detector.

Three soil samples collected from approximately 30 to 50 ft bgs will be retained for chemical analyses. Based on field screening for organic vapors, additional samples may be retained.

Samples of soil will be collected in brass tubes and their ends will be covered with Teflon sheets and plastic caps. Samples will be labeled with a unique identification number, date and time, placed on ice in a cooler, and transported with chain-of-custody documentation to a laboratory certified by the State of California Department of Health Services. Samples of soil will be analyzed as described in Task 3.

The groundwater monitoring wells will be constructed of 4-inch outer diameter, Schedule 40 PVC casing with 20 feet of slotted screen and a bottom cap. We propose that the screen have a 0.010-inch slot size and that No. 1C Lone Star sand will be used for constructing the filter pack in the annular space around the screen. The screen slot and sand pack sizes may be modified based on well construction information from other groundwater monitoring wells in the area, if available. The screen of the well will be positioned approximately 5 feet above the groundwater table to 15 feet below the groundwater table. The filter pack will extend from the well bottom to 1.5 to 2 feet above the top of the screen. A 3 to 5 feet thick transition seal consisting of bentonite pellets will be emplaced above the sand pack and hydrated in place. The remainder of the well annulus will be sealed with high solids bentonite grout from the top of the transition seal to approximately 3 to 5 ft bgs. The remainder of the well annulus will be sealed with concrete and a traffic box will be installed over the well. Each traffic box will be slightly raised above the surrounding grade to prevent surface water from entering the well. The top of the well casing will be fitted with an expansion cap and locking mechanism.

Well development will be performed by West Hazmat no less than two days following well installation. Well development will be performed in accordance with applicable guidelines of the State of California Department of Health Services and Environmental Protection Agency. Development will consist of block surging and bailing or pumping. During development, field measurements of pH, temperature, conductivity, and turbidity will be recorded. Development will continue until these parameters appear to stabilize.

Downhole drilling and sampling equipment will be decontaminated before each use and at the conclusion of the project. Drilling wastes, development water, and decontamination wastes will be contained in DOT approved 55-gallon drums. These wastes will be temporarily stored on-site pending determination of an appropriate off-site disposal method by Webb.

Following well installation, reference elevations at each groundwater well will be surveyed by Rattray Associates, Inc. of Santa Ana, California. Well surveying will provide a ground surface reference elevation at each well location and the elevation of a top-of-casing reference mark on each well casing.

Task 2 - Groundwater Sampling. EKI proposes to sample the three newly installed monitoring wells no less than two days following well development. Prior to sampling, the depth to groundwater will be measured with an electronic water level indicator. Each well will then be purged using an electric submersible pump. A minimum of three well volumes of groundwater will be removed from each well. Well purging will be performed by West Hazmat. During purging, field measurements of pH, temperature, conductivity, and turbidity will be recorded.

Purge water will be contained in DOT approved 55-gallon drums for handling with other investigation wastes.

Groundwater samples will be collected from each well by EKI using a bottom emptying Teflon bailer. For quality control purposes, one equipment rinsate blank and one duplicate sample will be collected. Samples will be contained in 40 milliliter glass bottles. Samples will be labeled with a unique identification number, date and time, placed on ice in a cooler, and transported with chain-of-custody documentation to a laboratory certified by the State of California Department of Health Services.

Task 3 - Chemical Analyses of Soil and Groundwater Samples. We propose to analyze a minimum of three soil samples from each boring. Three soil samples collected from approximately 30 to 50 ft bgs will be analyzed for halogenated volatile organic compounds ("VOCs") using EPA Method 8010. Additional soil samples may be analyzed for halogenated VOCs if significant detections of organic vapors are observed during field screening of other soil samples.

Four samples of groundwater (one from each new well and one duplicate sample), plus one equipment rinsate blank sample, will be analyzed for VOCs using EPA Method 8260.

Task 4 - Report Preparation. After receipt of laboratory reports, EKI will prepare a brief report of findings. The report will include a brief description of observations during the investigation, boring and well construction logs, and laboratory reports.

SCHEDULE

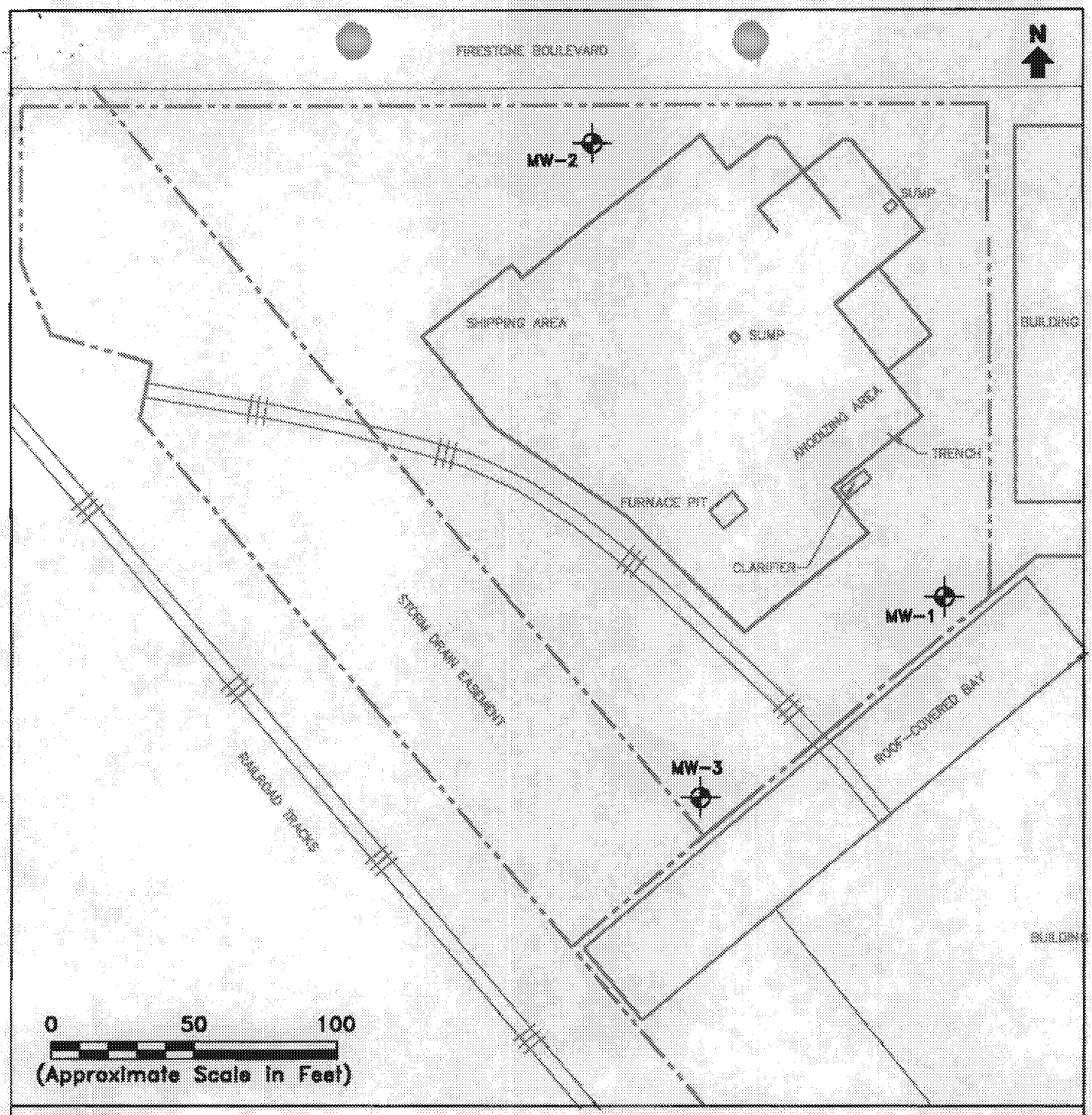
We plan to complete well installation on Tuesday and Wednesday, 24 and 25 February 1998. We expect to develop and sample the wells in the next week. Sample analyses will take approximately two weeks. A report will be complete and submitted to the RWQCB about two weeks after receipt of analytical results, by approximately the end of March 1998.

Please call with any comments of questions.

Very truly yours,
ERLER & KALINOWSKI, INC.

Steven G Miller, P.E. (Civil Engineer, Certificate 43419)
Project Manager

cc: Mr. Eli Stanesa, Jervis B. Webb Company



LEGEND

- PROPOSED SOIL BORING LOCATION
- PROPERTY LINE/BOUNDARY
- BUILDING
- RAILROAD SPUR

Notes:

1. All locations are approximate.

Erler & Kalinowski, Inc.

Locations of Proposed Groundwater Monitoring Wells

Jervis B. Webb Company
South Gate, CA
February 1998
EKI 961025.02

Figure 1

2L

Cal/EPA

Los Angeles
Regional Water
Quality Control
Board

101 Centre Plaza Drive
Monterey Park, CA
91754-2156
(213) 266-7500
FAX (213) 266-7600

Pete Wilson
Governor

February 2, 1998

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

SPILLS, LEAKS, INVESTIGATION AND CLEANUP OVERSIGHT COST REIMBURSEMENT ACCOUNT - JERVIS B. WEBB COMPANY - 5030 FIRESTONE BOULEVARD, SOUTH GATE, CA (SLIC NO. 744)

Dear Mr. Stanesa:

The California Water Code (CWC), Section 13304, allows the Regional Board to recover reasonable expenses from the responsible party to oversee cleanup of unregulated releases which have adversely affected waters of the State.

The subject site was used as a rivets manufacturing company. A Phase II Site Assessment was conducted and the results show the soil is impacted with various volatile organic compounds. The highest soil contamination found around the clarifier are 140 mg/kg of tetrachloroethene and 270 mg/kg of trichloroethene. The contaminants have exceeded the VOC soil cleanup levels. The released products have threatened to degrade the groundwater quality and the beneficial uses of the State's waters.

Works to be performed by Board staff during fiscal year 1997/1998 include reviewing site assessment workplans and reports, carrying out site inspections, and participating in meetings and conference calls.

The expected outcome of works performed include approval of workplans and corrective action plans.

We estimate that we will spend approximately 110 labor hours per year in the conduct of such oversight. The actual time needed will depend upon the nature and extent of the cleanup and your willingness to accomplish the cleanup in a timely manner. The State billing rate is approximately $70.00 per hour.

A detailed description of the billing procedure and salary scale are enclosed. We are requesting your acknowledgment of cost recovery obligations to reimburse the State of California for staff oversight by signing and returning the acknowledgment on or before **March 2, 1998**.

If you have any questions concerning the billing procedure, please contact Mr. Jim Ross, Site Cleanup Unit Chief at (213)266-7550 or Ms. Wendy Liu at (213) 266-7530.

Sincerely,

DENNIS A. DICKERSON
Executive Officer

Enclosures

ACKNOWLEDGMENT OF RECEIPT OF
CLEANUP AND ABATEMENT COST RECOVERY LETTER

I, ELI STANESA, acting within the authority vested in me as an authorized representative of JERVIS B. WEBB COMPANY OF CALIFORNIA, a corporation, acknowledge that I have received and read a copy of the attached REIMBURSEMENT PROCESS FOR REGULATORY OVERSIGHT and the cover letter dated February 2, 1998, concerning cost reimbursement for Regional Board staff costs involved with oversight of cleanup and abatement efforts.

I understand the reimbursement process and billing procedures as explained in the letter. Our company is willing to participate in the cost recovery program and pay all subsequent billings in accordance with the terms in your letter and its attachments. I also understand that signing this form does not constitute any admission of liability, but rather only an intent to pay for costs associated with oversight. Billings for payment of oversight costs should be mailed to the following individual and address:

BILLING CONTACT ELI STANESA

BILLING ADDRESS JERVIS B. WEBB COMPANY
34375 W. TWELVE MILE ROAD
FARMINGTON HILLS, MI 48331

TELEPHONE NO. (248) 553-1000

Eli Stanesa
(Signature)

ASSOCIATE GENERAL COUNSEL
(Title)

Date: FEBRUARY 4, 1998

FACSIMILE TRANSMISSION COVERSHEET

DATE: January 29, 1998 **Total pages including coversheet: 3**

TO: Jenny Au, RWQCB

FAX: 213-266-7668 **PHONE:** 213-266-7576

RE: Jervis B. Webb (CAD 008 339 467)

FROM: Jeff Inglis
U.S. EPA (SFD-5)
75 Hawthorne Street
San Francisco, CA 94105

FAX: 415-744-1917 **PHONE:** 415-744-2348

Ms. Au:

This is to follow up on our telephone conversation this afternoon on the above site. Your future contact for this site is Rachel Loftin, at the same address above. Her phone is: 415-744-2347.

Please forward to Rachel a copy of the site sampling plan that EKI submits for your review. She will then respond to you as to what level of information she will need to see from that point on.

Attached is a copy of the letter that we sent out on this site.

Jeff Inglis
R9 Superfund Program

U. S. ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

February 27, 1997

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, Michigan 48331-5624

Re: Request for Reassessment of the Jervis B. Webb Company of California
Property at 9301 Rayo Avenue, South Gate, California
EPA ID Number: CAD 008339467

Dear Mr. Stanesa:

EPA is aware that the Jervis B. Webb Company ("Webb") is in the process of trying to sell the property it owns at 9301 Rayo Avenue ("Rayo parcel"). The Rayo parcel, along with the property owned by Webb and located at 5030 Firestone Boulevard ("Firestone parcel"), comprise the property that was the subject of a Preliminary Assessment /Site Inspection conducted by EPA and its contractors. The EPA CERCLIS ID Number for this property is CAD 008339467.

In an effort to facilitate the sale of the Rayo parcel, Webb requested that EPA reassess the Rayo parcel in light of cleanup actions that were recently completed at the Rayo parcel and, if appropriate, remove the site from the active CERCLIS database. On January 16, 1997, Erler & Kalinowski, Inc. ("EKI") submitted a request for reassessment to EPA on behalf of Webb along with documentation regarding the underground storage tank closure activities as well as other general site cleanup work. EPA has reviewed the report submitted by EKI and finds that the work performed in closing the underground tank and in cleaning up the utility trench is satisfactory with respect to the areas of the Rayo parcel addressed by those actions. However, we feel that additional sampling for VOCs should be conducted at both the Rayo and Firestone parcels to address concerns regarding historical solvent usage by Webb..

Pursuant to our review of the Preliminary Assessment/Site Inspection and based on our knowledge of historical operations at the Firestone parcel, EPA would require additional sampling for VOCs in the following areas prior to making any determination with respect to removing the site from the active CERCLIS database: 1) sampling at the location of the hazardous waste storage area on the Firestone parcel; 2) sampling beneath the paved area between the Rayo and Firestone buildings where parts cleaning was formerly conducted; and 3) sampling in the drainage

area to the west of the parts cleaning area. Should you decide to undertake this work, we recommend that you submit a sampling plan to EPA and the California Regional Water Quality Control Board for our review prior to sampling to avoid unnecessary resampling.

EPA remains committed to working with Webb to identify any environmental work that may need to be completed at the Rayo and Firestone parcels prior to "archiving" or removing this site from the active CERCLIS database. If you have any questions regarding this matter, please contact Steve Simanonok of my staff at (415) 744-2358.

Keith Takata

Keith Taka

Director
Superfund Division

cc. Steve Miller, EKI (via fax)

3.0 REMOVAL ASSESSMENT CRITERIA — NCP EVALUATION

Use the following criteria to determine if the site should be referred to EPA's Removal Section. If the answer to any question is yes, get EPA concurrence for the decision. If all answers are no, go to Section 4. If a question cannot be answered, explain why in the Comments section below.

1.	Is there actual or potential exposure to nearby populations, animals, or the food chain from hazardous substances, pollutants, or contaminants?	[ ] Yes	[X] No
2.	Is there actual or potential contamination of drinking supplies or sensitive ecosystems?	[X] Yes	[ ] No
3.	Are hazardous substances, pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers which may pose a threat of release?	[ ] Yes	[X] No
4.	Are there high levels of hazardous substances, pollutants, or contaminants is soils largely at or near the surface, which may migrate and affect populations or the environment?	[ ] Yes	[X] No
5.	Could weather conditions cause hazardous substances, pollutants, or contaminants to migrate or be released?	[ ] Yes	[X] No
6.	Is there a threat of fire or explosion?	[ ] Yes	[X] No
7.	Are there appropriate Federal or State response mechanisms to respond to the release or potential release?	[X] Yes	[ ] No
8.	Are there other situations or factors which may pose threats to public health, welfare, or the environment?	[ ] Yes	[X] No
9.	< Reserved >	[ ] Yes	[ ] No
10.	For the situation where there appears to be primarily a groundwater contamination problem, is there a near-surface source which can be removed?	[ ] Yes	[X] No

Comments: _____

DECISION:

[ ] **Removal Assessment**
Go to Section 7

[ ] **Expanded Removal Assessment**
Go to Section 7

[X] **Not Appropriate For Removal Action**
Go to Section 4

4.0 OTHER INFLUENCING FACTORS

Assign a high, medium, or low priority category to each of the following factors and then use these factors to help make preliminary recommendations in Section 5. A high priority influence may indicate that a Preliminary Assessment should be conducted as a high priority without regard to other screening factors.

Other Influences	High	Medium	Low
1. Site remedial/ removal history	[ ] None	[X] Some	[ ] All wastes removed
2. Regulatory involvement	[X] No involvement	[ ] Somewhat involved	[ ] Other agency currently active
3. Environmental justice	[ ] Site is in low income/minority neighborhood		[X] Site is not in low income or minority neighborhood
4. Brownfields/Redevelopment	[ ] Possible candidate		[X] Not a likely candidate
5. Political attention	[ ] Very visible/vocal	[ ] Some involvement	[X] None
6. Public attention	[ ] Very visible/vocal	[ ] Some involvement	[X] None
7. Remedial Costs	[X] Likely very expensive or difficult		[ ] Easy and relatively cheap

Comments:
From 1990 to 1993, 50 55-gallon drums containing waste paints, used paint filters, and paint bags were transported off-site for disposal. According to the U.S. EPA files, there were still some drums of hazardous waste stored on the site, and also a former 8,000-gallon paint and water sump that was used during the wet-painting process. Nothing is said in the files about how this waste was disposed of. Also, there have been no soil or groundwater samples taken for the site. Therefore, it has not been confirmed whether or not there is actually still hazardous waste present on the site.

OTHER INFLUENCING FACTORS CATEGORY:

HIGH MEDIUM LOW

5.0 PRELIMINARY RECOMMENDATIONS

Use the information in sections 1 through 4 and professional judgement to make a preliminary determination of the need for further investigation of the actual or potential threat posed by hazardous substance contamination at this site. Select one of the following options for site disposition.

5.1. Prioritize for Site Assessment

Further site assessment appears warranted (PEA/SI).

5.1.a. Prioritize for Site Assessment under State Lead [ ]

Complete Section 6 to determine if site should be high, medium, or low priority for further assessment.

5.1.b. Prioritize for Site Assessment under EPA Cooperative Agreement [X]

Complete Section 6 to determine if site should be high, medium, or low priority for further assessment.

5.2. High Priority Site Assessment [ ]

The influencing factors in Section 4 suggest that further site assessment be conducted as a high priority. Go to Section 7.

5.3. Referral To DTSC'S Hazardous Waste Management Program (REFRC) [ ]

Recommend REFRC for sites that can be remediated as a Corrective Action under H&S Code 25187. Go to Section 7.

5.4 Referral to Regional Water Quality Control Board (REFRW) [ ]

Recommend REFRW for sites that fall under RWQCB authority and for which RWQCB is providing oversight of investigation/remediation. Go to Section 7.

5.5 Referral to another agency (REFOA) [ ]

Recommend REFOA for sites where another agency (other than RWQCB) is providing or has provided oversight. Go to Section 7.

5.6 No Futher Action Under CERCLA [ ]

Recommend No Further Action for sites where documented contamination is not significant by EPA/DTSC standards and the presence of greater contamination is unlikely. Go to Section 7.

Comments: Sampling needs to be performed, and no agency is dealing with this site.

6.0 SITE PRIORITIZATION WORKSHEET

Site Name: Jervis Webb Co. **Site Screener:** Joseph Cully
EPA ID Number: CAD008339467 **Date:** November 25, 1997
Site Assessment Phase: Site Prioritization

The following risk-based criteria should be used as a guideline to assist in the prioritization of pre-CERCLIS and CERCLIS sites. These guidelines can be used in various stages of assessment. When interpreting the information provided below, one should understand that conservative assumptions were made where information is lacking and the risk value is subjective.

Site screeners should complete this form by using the categories as guidelines. The "Notes" sections should be used to document assumptions made, data sources, or other information pertinent to determining risk prioritization.

6.1 HAZARDS IDENTIFICATION

Complete the sections below for the suspected contaminants of greatest concern. Use SCDMs as a reference for assigning hazardous substance risk category. Assign a Hazard Factor for each hazardous substance evaluated and then assign an Overall Hazard Factor Value combining the separate Hazard Factors. If only one hazardous substance is evaluated, the Overall Hazard Factor Value will be the same as the Hazard Factor for A.

HAZARDOUS SUBSTANCE A: Tetrachloroethylene

Estimate the risk associated with the hazard properties for this hazardous substance.

Hazard Property	HIGH	MEDIUM	LOW
Quantity	[ ] ≥10,000 lbs; or or 5 mil. gals; or or 25,000 yds³	[ ] <10,000 lbs and ≥100 lbs; or <5 mil. gals and ≥50,000 gals; or <25,000 yds³ and ≥250 yds³	[X] <100 lbs. or 50,000 gals. or 250 yds³
Toxicity	[ ] ≥10,000	[X] <10,000 and ≥100	[ ] <100
Mobility	[X] 1	[ ] <1 and ≥0.001	[ ] <0.001
Bioavailabilty	[ ] ≥1,000	[X] <1,000 and ≥10	[ ] <10
Concentration (if known)	[ ] ≥benchmark =	[ ] near benchmark = 17 ug/L Concentration is unknown	[ ] low relative to benchmark =
Level of Containment	[ ] None	[X] Partial	[ ] Full
Hazard Factor for A	HIGH	(MEDIUM)	LOW

Comments: Benchmark based on August 1, 1996 Preliminary Remediation Goals of U.S. EPA for groundwater in industrial areas. No samples have been taken, so the concentration is unknown.

HAZARDOUS SUBSTANCE B: Trichloroethylene

Estimate the risk associated with the hazard properties for this hazardous substance.

Hazard Property	HIGH	MEDIUM	LOW
Quantity	[ ] ≥10,000 lbs; or or 5 mil. gals; or or 25,000 yds³	[ ] <10,000 lbs and ≥100 lbs; or <5 mil. gals and ≥50,000 gals; or <25,000 yds³ and ≥250 yds³	[X] <100 lbs. or 50,000 gals. or 250 yds³
Toxicity	[ ] ≥10,000	[ ] <10,000 and ≥100	[X] <100
Mobility	[X] 1	[ ] <1 and ≥0.001	[ ] <0.001
Bioavailability	[ ] ≥1,000	[X] <1,000 and ≥10	[ ] <10
Concentration (if known)	[ ] ≥benchmark =	[ ] near benchmark = 7 ug/L. Concentration is unknown	[ ] low relative to benchmark =
Level of Containment	[ ] None	[X] Partial	[ ] Full
Hazard Factor for B	HIGH	MEDIUM	LOW

Comments: Benchmark based on August 6, 1996 Preliminary Remediation Goals of U.S. EPA for groundwater in industrial areas. No samples have been taken, so the actual concentration is unknown.

OVERALL HAZARD FACTOR VALUE: HIGH MEDIUM LOW

6.2 VULNERABILITY ANALYSIS

Assign a risk category to each of the following vulnerability factors. Assign an Overall Vulnerability Factor Value for the site based on the dominant vulnerability risk categories.

Vulnerability Factor	High	Medium	Low
1. Environmental Setting - Land use within 0.5 miles of the site	[ ] Residential	[ ] Agricultural/ Commercial	[X] Industrial
2. Sensitive Populations - Children, the elderly, or groups with poor health live:	[ ] Within 0.25 miles of site		[X] More than 0.25 miles from site
3. Population Density - Evaluate within 0.5 miles.	[ ] Dense	[X] Moderate	[ ] Sparse
4. Groundwater Use - Wells used for drinking water are located:	[X] Within 0.5 miles of the site	[ ] 0.5 to 2 miles from site	[ ] More than 2 miles from site
5. Groundwater Contamination - Evaluate groundwater contamination within 2 miles of the site.	[ ] Known	[X] Possible	[ ] Not likely
6. Surface Water Location - Distance to nearest surface water body. If used for drinking water or known to be contaminated, bump to next higher risk category.	[ ] Within 0.5 miles of the site	[ ] 0.5 to 2 miles from site	[X] More than 2 miles from site
7. Sensitive Habitats - Distance to nearest sensitive habitat. If known or projected contamination within habitat, bump to next higher risk category.	[ ] Within 0.5 miles of the site	[ ] 0.5 to 2 miles from site	[X] More than 2 miles from site
8. Soil/Air Contamination - Evaluate the potential for exposure to individuals from contaminated soil or air releases.	[ ] Documented or probable exposure	[ ] Potential for exposure	[X] Exposure not likely
9. Sampling Data Confidence - Evaluate the quality of any data available for the site.	[ ] No oversight; no QA/QC; no data	[X] Regulatory oversight; EPA methods; partial or unknown QA/QC	[ ] Regulatory oversight; EPA methods; QA/QC validation

Notes: _____

OVERALL VULNERABILITY FACTOR VALUE: HIGH **MEDIUM** **LOW**

6.3 PRIORITIZATION SCREENING RISK ANALYSIS

Assign a Site Priority Level based on the dominant risk categories given for the hazard and vulnerability factor values.

HAZARD FACTOR VALUE	HIGH	MEDIUM	LOW
VULNERABILITY FACTOR VALUE	HIGH	MEDIUM	LOW
SITE PRIORITY LEVEL	HIGH	**MEDIUM**	LOW

Additional Comments: _____

7.0 SITE RECOMMENDATION

Site Name: Jervis Webb Co. **Site Screener:** Joseph Colby
EPA ID Number: CAD008339467 **Date:** November 25, 1997

7.1. Futher Site Assessment Warranted

7.1.a Under State Lead
High Priority [ ] **Medium Priority** [ ] **Low Priority** [ ]

Recommend further site investigation under State lead.

7.1.b Under EPA Cooperative Agreement
High Priority [ ] **Medium Priority** [X] **Low Priority** [ ]

Recommend further site investigation under the EPA cooperative agreement.

7.2. Recommended for Removal Assessment [ ]
or Expanded Removal Assessment [ ]

Recommend referral to EPA's Removal Section.

7.3. Referral To DTSC'S Hazardous Waste Management Program (REFRC) [ ]

Recommend REFRC for sites that can be remediated as a Corrective Action under H&S Code 25187.

7.4 Referral to Regional Water Quality Control Board (REFRW) [ ]

Recommend REFRW for sites that fall under RWQCB authority and for which RWQCB is providing oversight of investigation/remediation.

7.5 Referral to another agency (REFOA) [ ]

Recommend REFOA for sites where another agency (other than RWQCB) is providing or has provided oversight.

7.6 No Futher Action Under CERCLA [ ]

Recommend No Further Action for sites where documented contamination is not significant by EPA/DTSC standards and the presence of greater contamination is unlikely.

Comments: Sampling needs to be done, and no other agency is overseeing this.

EPA CONCURRENCE: _____
signature date

Attachment A

SITE SCREENING CONTACT LOG

Site Name: Jervis Webb Co. Site Screener: Joseph Cully

Contact Name	Affiliation	Telephone Number	Date	Discussion
John Rhodes	LA-RWQCB	(213) 266-7500	9/15/97	Left message with Mr. Rhodes, asking him if there was any status with RWQCB for this site.
Eric Gonzales	L.A. Co. Fire Dept.: Paramount Office	(562) 790-1810	9/15/97	Jervis Corporation went out of business, and has been replaced by Reliable Steel. Jervis-Webb went out of business at this site on March 29, 1996, and the Corporation is now located at 34375 West Twelve Mile Road, Farmington Hills, MI 48331. (810) 553-1000. Reliable Steel only generates very small quantities of waste oil, and does not need a license with the County. Mr. Gonzales referred me to Tom Klinger, his supervisor.
Tom Klinger	L.A. Co. Fire Dept.: Supervisor	(213) 890-4106	9/15/97	Left word with Mr. Klinger, asking him if there was any cleanup action against this site by L.A. County Health Haz. Mat.
Tom Klinger	"	"	9/16/97	L.A. Co. Site Mit. is not overseeing any cleanups at this site.
Jenny Au	LA-RWQCB	(213) 266-7576	10/28/97	RWQCB is not working on this site.

ATTACHMENT B

SITE SCREENING OBSERVATION RECORD

Site Name: Jervis-Webb Co. Site Screener: Joseph Colly
EPA ID Number: CAD008339467 Date: October 23, 1997

1. Status: Active X Inactive ___ Different Company X Reliable Steel

2. Setting: Residential ___ Commercial ___ Industrial X Agricultural ___ Paved X Unpaved ___ Restricted access ___ Unrestricted access X Near RR Tracks Right next to them Near drainage ___
Vegetation Bushes around site, Trees in parking lot
Topography Flat

3. Visibility: ___

4. Waste Description: None Visible
Containment:
Pond ___ Pit ___ Ditch ___
Drums ___ Tanks ___ Buckets ___
Trash can ___ Dumpster ___ Sacks ___
Piles ___ Scattered ___ Other ___

Stored On:
Bare Ground ___ Asphalt ___ Pallets ___
Gravel ___ Concrete ___ Other ___

Waste Type:
Inert ___ Garbage ___ Liquid ___
Solid ___ Sludge ___ Gas ___

Describe quantities, labelling, colors, odors, etc.: None

5. Distance to surface water and sensitive environments or ecosystems:
Not close.

6. Proximity to residences, schools, daycare facilities, hospitals, nursing homes, etc.:
Not close.

7. Estimated number of people living or working in the area: Heavily Industrialized.

8. Distance to food processing/packaging or agricultural production: Not close.

4630 SP

EPA REGION IX SITE SCREENING CHECKLIST

This review checklist is to be used by individual site screening staff when reviewing sites which have been brought to the attention of EPA or the State. Each site is reviewed on the merits of the discovery documentation and additional information gathered during the screening process. The guiding principal in evaluating a given site is to use common sense in assessing the information and subsequently presenting the site and its known hazardous potential to the SST.

1.0 GENERAL INSTRUCTIONS

Complete Section 1 for the site using readily available information and contacting appropriate individuals. A contact log (Attachment A) should be used to document information gained through correspondence, interviews, and telephone calls. Handwriting is acceptable if it is legible. Attach extra pages if necessary.

1.1 Site Information

Site Name: Jervis Webb Co.

Alias Name:

Site Street Address: 9301 Rayo Ave.

City, County, State: South Gate, Los Angeles, Ca.

EPA ID Number: CAD008339467

Site Screener: Joseph Cully Date: November 25, 1997

Date of Discovery: 05/14/93

Discovery Vehicle:

[ ] County Referral
[ ] Citizen Petition
[X] RCRA Referral
[ ] State Referral
[ ] State PA/SI Grant
[ ] Nonemergency Release Report
[ ] Lawsuit
[ ] Removal
[ ] Newspaper
[ ] Other

Is this site part of an NPL site? [ ] Yes [X] No

CERCLIS Status:
[ ] Other (specify): _____
[ ] Discovery PA
[X] SI
[ ] NFRAP
[ ] Not in CERCLIS

State oversight role:
PA/SI Cooperative Agreement [x] Yes [ ] No [ ] Not applicable
Cooperative Agreement Number: V999252-01-02

EPA Project Officer: Rachel Loftin

RCRA Status:
[X] Generator
[ ] TSDF
[ ] Transporter
[ ] Not listed in RCRIS

In a State Database(s)? [ ] Yes [X] No If yes, specify. _____

1.2 CERCLA Eligibility

If the answer to question 1 is "No", or if the answer to any question of 2 through 8 is "Yes", the site is ineligible for CERCLA evaluation and the decision at the bottom of this page is "No Further Action Under CERCLA". The answers to questions 9 through 16 should be used to identify sites that may not be appropriate for CERCLA evaluation without further justification. If a question cannot be answered, explain why in the Comments section below.

1. Has a release of hazardous substances, pollutants, or contaminants occurred?	[X] Yes	[ ] No
2. Does the release or threat of release consist only of crude oil or unaltered petroleum product?	[ ] Yes	[X] No
3. Is the site subject to corrective action under RCRA Subtitle C (hazardous waste treatment, storage, or disposal facility)?	[ ] Yes	[X] No
4. Does the release or threatened release fall under the jurisdiction of the Uranium Mill Tailings Radiation Control Act (UMTRCA)?	[ ] Yes	[X] No
5. Does the release or threatened release fall under the jurisdiction of the Atomic Energy Act (AEA)?	[ ] Yes	[X] No
6. Is the release or threatened release a result of a legal application of pesticides under Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)?	[ ] Yes	[X] No
7. Is the release or threatened release regulated under the Oil Pollution Act (OPA)?	[ ] Yes	[X] No
8. Is the release or threatened release permitted under the Nuclear Regulatory Commission (NRC)?	[ ] Yes	[X] No
9. Is the site a federal facility?	[ ] Yes	[X] No
10. Is the site outside of U.S. boundaries?	[ ] Yes	[X] No
11. Is the site outside of EPA, Region IX borders?	[ ] Yes	[X] No
12. Is the site within Native American Tribal lands?	[ ] Yes	[X] No
13. Is the site currently under the control and management of a state/local agency? If yes, which agencies?	[ ] Yes	[X] No
14. Is the site currently operating?	[X] Yes	[ ] No
15. Is the site address valid?	[X] Yes	[ ] No
16. Has the site been investigated under an alias?	[ ] Yes	[X] No

Comments: Jervis Company went out of business. Now owned and operated by Reliable Steel

DECISION: [ ] **No Further Action Under CERCLA**
Go to Section 7

[X] **Go to Section 2**

2.0 TECHNICAL INFORMATION

This section contains information about site's operational history and environmental sampling. Complete the following section by filling in the blanks or checking the appropriate boxes. If a question cannot be answered, explain why. If a drive-by is performed, complete Attachment B.

2.1 Operational History

1a. List present site owner(s) and operator(s). [Include dates of ownership]:
Reliable Steel has been the owner and operator of this site since March 29, 1996, when Jervis Corp. went out of business.

1b. Are hazardous substances presently on site? [X] Yes [ ] No
If yes, how and where are substances stored and used?
Reliable Steel only generates very small quantities of waste oil.

2a. List historic site owner(s) and operator(s). [Include dates of ownership]:
Before 1950, the site was undeveloped agricultural land. 1950 - Jervis built the manufacturing building and began operating a custom conveyor and crane manufacturing facility. Until 1996, this site was owned by Jervis B. Webb Company of Farmington, Michigan.

2b. Were hazardous substances present on site in the past? [X] Yes [ ] No
If yes, how and where were substances stored and used?
8,000-gallon water and paint sump.

Additional comments: Jervis has operated a conveyor manufacturing shop at the site since the 1950's. Undocumented quantities of oil-based paint wastes were generated on site in a former 8,000-gallon water and paint sump. Paints used on site have contained lead chromate.

2.2 Contaminant(s):

List any hazardous substances, pollutants, or contaminants that have been identified at the site and indicate whether they have been quantified (e.g., by sampling).

		Suspected	Identified	Quantified	Comments
[ ]	Ammonia	[ ]	[ ]	[ ]	
[ ]	Arsenic	[ ]	[ ]	[ ]	
[ ]	Asbestos	[ ]	[ ]	[ ]	
[ ]	Beryllium	[ ]	[ ]	[ ]	
[ ]	Cadmium	[ ]	[ ]	[ ]	
[ ]	Carbon tetrachloride	[ ]	[ ]	[ ]	
[ ]	Chloroform	[ ]	[ ]	[ ]	
[X]	Chromium (+3 or +6)	[X]	[ ]	[ ]	
[ ]	Copper	[ ]	[ ]	[ ]	
[ ]	Cyanide	[ ]	[ ]	[ ]	
[ ]	Dichloroethene,1,1-	[ ]	[ ]	[ ]	
[ ]	Dioxin	[ ]	[ ]	[ ]	
[ ]	Ethyl benzene	[ ]	[ ]	[ ]	
[X]	Lead	[X]	[ ]	[ ]	
[ ]	Mercury	[ ]	[ ]	[ ]	
[ ]	Methylene chloride	[ ]	[ ]	[ ]	
[ ]	Nickel	[ ]	[ ]	[ ]	
[ ]	P-Dichlorobenzene	[ ]	[ ]	[ ]	
[ ]	Pentachlorophenol	[ ]	[ ]	[ ]	
[ ]	Phenol	[ ]	[ ]	[ ]	
[ ]	Polychlorinated biphenyls (PCBs)	[ ]	[ ]	[ ]	
[ ]	Polycyclic aromatic hydrocarbons (PAHs)	[ ]	[ ]	[ ]	
[ ]	Toluene	[ ]	[ ]	[ ]	
[ ]	Trichloroethylene	[ ]	[ ]	[ ]	
[ ]	Vinyl chloride	[ ]	[ ]	[ ]	
[ ]	Xylene	[ ]	[ ]	[ ]	
[ ]	Zinc	[ ]	[ ]	[ ]	
[X]	Other chemicals (List):	[ ]	[X]	[ ] Trichloroethylene	
		[ ]	[X]	[ ] Perchloroethylene	

Additional Comments: Lead and chromium are suspected due to the lead chromate paint that was handled there. Although no soil or groundwater sampling has been conducted at this site, this site is located in an industrial area within the area of a known groundwater contamination plume of trichloroethylene (TCE) and tetrachloroethylene/perchloroethylene (PCE).

2.3 Has a release as defined in CERCLA Section 101(22) occurred?

[X] Yes [ ] Suspected [ ] No

Identify the source(s) of the release or suspected release (e.g., drums, landfill, surface impoundment, waste pile, etc.): A former 8,000-gallon paint and water sump was used during the wet-painting process. The sump was converted to hold paint filters for a dry-painting booth in the mid-1980's. Also, from 1990 to 1993, 50 55-gallon drums containing waste paint, used paint filters, and paint rags were transported off site for disposal.

2.4 Pathway(s) of contaminant migration:

[ ] Air [X] Groundwater [ ] Surface Water [ ] Soil

Briefly describe any identified pathway: There are many drinking water systems within a 4-mile radius of the site. However, there has been no sampling of ground water. 57 drinking water wells, 12 drinking water systems that serve approximately 410,506 people.

2.5 Sampling History

1. Has sampling been conducted? [ ] Yes [X] No
2. If environmental sampling has been conducted, use the Sampling Event Summary Table, Attach-ment C, to record the information.

2.6 Additional Information

Use this space to present additional information that may be used to support site screening decisions.

A regional trichloroethylene and tetrachloroethylene groundwater plume has been identified in the South Gate area. However, there has been no soil or groundwater sampling in this area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

February 27, 1997

Mr. Eli Stanesa
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, Michigan 48331-5624

Re: Request for Reassessment of the Jervis B. Webb Company of California
Property at 9301 Rayo Avenue, South Gate, California
EPA ID Number: CAD 008339467

Dear Mr. Stanesa:

EPA is aware that the Jervis B. Webb Company ("Webb") is in the process of trying to sell the property it owns at 9301 Rayo Avenue ("Rayo parcel"). The Rayo parcel, along with the property owned by Webb and located at 5030 Firestone Boulevard ("Firestone parcel"), comprise the property that was the subject of a Preliminary Assessment /Site Inspection conducted by EPA and its contractors. The EPA CERCLIS ID Number for this property is CAD 008339467.

In an effort to facilitate the sale of the Rayo parcel, Webb requested that EPA reassess the Rayo parcel in light of cleanup actions that were recently completed at the Rayo parcel and, if appropriate, remove the site from the active CERCLIS database. On January 16, 1997, Erler & Kalinowski, Inc. ("EKI") submitted a request for reassessment to EPA on behalf of Webb along with documentation regarding the underground storage tank closure activities as well as other general site cleanup work. EPA has reviewed the report submitted by EKI and finds that the work performed in closing the underground tank and in cleaning up the utility trench is satisfactory with respect to the areas of the Rayo parcel addressed by those actions. However, we feel that additional sampling for VOCs should be conducted at both the Rayo and Firestone parcels to address concerns regarding historical solvent usage by Webb..

Pursuant to our review of the Preliminary Assessment/Site Inspection and based on our knowledge of historical operations at the Firestone parcel, EPA would require additional sampling for VOCs in the following areas prior to making any determination with respect to removing the site from the active CERCLIS database: 1) sampling at the location of the hazardous waste storage area on the Firestone parcel; 2) sampling beneath the paved area between the Rayo and Firestone buildings where parts cleaning was formerly conducted; and 3) sampling in the drainage

area to the west of the parts cleaning area. Should you decide to undertake this work, we recommend that you submit a sampling plan to EPA and the California Regional Water Quality Control Board for our review prior to sampling to avoid unnecessary resampling.

EPA remains committed to working with Webb to identify any environmental work that may need to be completed at the Rayo and Firestone parcels prior to "archiving" or removing this site from the active CERCLIS database. If you have any questions regarding this matter, please contact Steve Simanonok of my staff at (415) 744-2358.

Keith Takata

Keith Taka

Director
Superfund Division

cc: Steve Miller, EKI (via fax)

Rachel Loftin

02/26/97 01:50 PM

To: Jim Hanson
cc: Betsy Curnow
Subject: Re: First Region 9 "Discomfort Letter"

Jim - Here's my 2 cents on the "Discomfort Letter". My comments are based on our discussions about looking for data that is usable to re-score and NFA or archive the site...

We should strenghten the last sentence in the 2nd paragraph to indicate that the additional samping for VOCs is needed from locations on and surrounding the Rayo property.

Depending on the approach that will be used for the sampling (e.g., one event, or phased sampling) you may want to indicate what type of sampling is being requested. To re-score the site, data from soils and shallow groundwater would be needed. Some of this may be available from RWQCB which could streamline what the RP would need to do. They may also want to get soil gas samples since the VOCs may not show up in the soils even though they are in groundwater. The soil gas data could be used to establish the absence or presence of the VOCs on site. The soil gas isn't necessary for re-scoring, but could clear this RP.

? How were the 3 sampling locations identified? If comparable background samples are not currently available, they will need to collect samples from areas that would not be expected to be contaminated or impacted from site activities. Its also possible that the locations identified in the letter could change after a review of their existing data as compared to the data available from the CERCLIS file and RWQCB. Maybe we could say these are tentatively identified locations.

Do we know what RWQCB's current involvement is?

Rachel

Jim Hanson

Jim Hanson
02/25/97 05:58 PM

To: Bill Keener, Rachel Loftin, Steve Simanonok
cc: Betsy Curnow
Subject: First Region 9 "Discomfort Letter"

Attorney Client / Ex. 5

WEBB.WP

To: Michel Iskarous, DTSC

Fax: (818) 717-6557 6527

Phone : (818) 717-6547

From: Lucy Lopez, DTSC

Phone: 925-828-3511

Total Pages including cover : ~~27~~ 12

Part 1 of 3

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-96)
Please print or type. Form designed for use on elite (12 pitch) typewriter.

See instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD008339467
Manifest Document No.: 38730
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
JERVIS B. WEBB COMPANY OF CALIFORNIA
9301 RAVO
SOUTH GATE, CA 90208 213-588-8371

4. Generator's Phone:

A. State Manifest Document Number: 95738730
B. State Generator's ID:

5. Transporter 1 Company Name: INDUSTRIAL WASTE UTILIZATION
6. US EPA ID Number: CAD980535293
C. State Transporter's ID: 619292
D. Transporter's Phone: 909-984-9984

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address:
STATEWIDE ENVIRONMENTAL
12618 MAIN STREET
LOS ANGELES CA 90061
10. US EPA ID Number: CAD000088252
G. State Facility's ID: [illegible]
H. Facility's Phone: 213-756-7896

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste Number
a. WASTE AEROSOLS, FLAMMABLE 2.1 UN1950	001	DF	00025	P	State: 331 EPA/Other: D001-D035
b. WET PATCH SEALANT NON RCRA HAZARDOUS WASTE SOLID,	001	DM	00010	P	State: 331 EPA/Other: NON RCRA
c. GREASE NON RCRA HAZARDOUS WASTE SOLID,	005	DM	00200	P	State: 331 EPA/Other: NON RCRA
d.					State: EPA/Other:

J. Additional Descriptions for Materials Listed Above:
(11a)-, PAINT/LUBRICANT AEROSOLS 99%-100%, (11b)-, WET PATCH SEALANT 99%-100%, (11c)-, GREASE 99%-100%

K. Handling Codes for Wastes Listed Above:
a. 4101 b. 4103
c. 4103 d.

15. Special Handling Instructions and Additional Information:
(11a)-Approval #33040-C, ERG#-, (11b)-Approval #33039-C, ERG#-, (11c)-Approval #33041-A, ERG#- EMERGENCY CONTACT: 909-984-9984
CONTAINER SIZE: 11a 15 11b 5 11c 1-55gal - 4-5gal

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 government 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.

Printed/Typed Name: RANDY DUSTON
Signature: [signature]
Month Day Year: 03 12 96

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Victor Rhuis Jr.
Signature: [signature]
Month Day Year: 03 12 96

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space:

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19
Printed/Typed Name: TONY GUEVARA
Signature: [signature]
Month Day Year: 03 13 96

DO NOT WRITE BELOW THIS LINE.

95738730

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802. WITHIN CALIFORNIA, CALL 1-800-852-7550

State of California Environmental Protection Agency
Form Approved OMB No. 2050-0039 Expires 8-30-97
Please print or type. Form designed for use on elite (12 pitch) typewriter.

See instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD000[illegible]
Manifest Document No.: 38744
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
[illegible] WEBB COMPANY OF CALIFORNIA
[illegible] BAYO
[illegible] GATE, CA 90208 [illegible]

4. Generator's Phone:

A. State Manifest Document Number: 95738744
B. State Generator's ID:
C. State Transporter's ID: 614292
D. Transporter's Phone: 909-984-9984
E. State Transporter's ID:
F. Transporter's Phone:
G. State Facility's ID: CAT080022148
H. Facility's Phone: 909-350-0580

5. Transporter 1 Company Name: INDUSTRIAL WASTE UTILIZATION
6. US EPA ID Number: CAD980585292
7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address:
BROCO ENVIRONMENTAL, INC.
2610 N. ALDER
RIALTO CA 92377
10. US EPA ID Number: CAT080022148

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Container No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste Number
a. RQ. WASTE PAINT (D001) 3 UN1263 II	001	DM	00050	G	State: 461 EPA/Other: D001 D035
b. WATER-BASED PAINT NON RCRA HAZARDOUS WASTE LIQUID.	002	DM	00100	G	State: 133 EPA/Other: NON RCRA
c. Hazardous Waste Solid NOS (D035) 9 NA 3077 III	002	DM	00400	P	State: 352 EPA/Other: D035
d.					State: EPA/Other:

J. Additional Descriptions for Materials Listed Above:
(11a)-, PAINT 99%-100%, (11b)-, WATER 70%-100%, WATER-BASED PAINT 0%-30%
(11c) Rags Contaminated with Paint and Kerosene 100%

K. Handling Codes for Wastes Listed Above:
a. 1/4/01 b. 1/4/01
c. 1/4/01 d.

15. Special Handling Instructions and Additional Information:
(11a)-Approval #XC0528, RQ#100 LBS ERG#-, (11b)-Approval #XC0526, ERG#-
EMERGENCY CONTACT: 909-984-9984 CONTAINER ISZE: 11a 55 11b 55 11c 55
(11c) Approval #XC0527 ERG #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 government 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.

Printed/Typed Name: RANDY DUSTON
Signature: [signature]
Month 03 Day 12 Year 96

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Victor R Luis Jr
Signature: [signature]
Month 03 Day 12 Year 96

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19
Printed/Typed Name: [illegible]
Signature: [signature]
Month 03 Day 1 Year 96

DO NOT WRITE BELOW THIS LINE.

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802 WITHIN CALIFORNIA, CALL 1-800-832-7550

GENERATOR

State of California Environmental Protection Agency
Form Approved OMB No. 2050-0039 Expires 9-30-96
Please print or type. Form designed for use on elite (12 pitch) typewriter.

See instructions on back of page 6

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD[illegible] | Manifest Document No.: 38745 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: SERVIN E. [illegible] COMPANY OF CALIFORNIA, 9301 BAYO, SOUTH GATE, CA 90201 | 4. Generator's Phone: 213-588-8[illegible]

A. State Manifest Document Number: 95738745

B. State Generator's ID:

5. Transporter 1 Company Name: INDUSTRIAL WASTE UTILIZATION | 6. US EPA ID Number: CAD[illegible]

C. State Transporter's ID: 614242

D. Transporter's Phone: 909-984-9984

7. Transporter 2 Company Name: | 8. US EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address: BRUCO ENVIRONMENTAL, INC., 2610 N. ALDER, RIALTO CA 92377 | 10. US EPA ID Number: CAT080022148

G. State Facility's ID: CAT080022148

H. Facility's Phone: 909-350-0500

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	L. Waste Number
a. RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (PAINTS, METHYL ETHYL KETONE), 3 UN1993, II	001	DM	00050	G	State: 331 214; EPA/Other: D159 D001
b.					State: ; EPA/Other:
c.					State: ; EPA/Other:
d.					State: ; EPA/Other:

J. Additional Descriptions for Materials Listed Above: (11a)-, METHYL ETHYL KETONE 0%-10%, OILS/LUBRICANTS 30%-60%, PAINTS 0%-50%, TURPENTINE 0%-10%

K. Handling Codes for Wastes Listed Above: a. [illegible] b. c. d.

15. Special Handling Instructions and Additional Information: (11a)-Approval #XC0525, ADD'L EPA CODE: D035 RQ-100 LBS ERG#- EMERGENCY CONTACT: 909-984-9984 CVONTAINER SIZE: 55 gal

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 government 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.

Printed/Typed Name: RANDY DUSTON | Signature: [signature] | Month 03 Day 12 Year 96

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Victor R. Luis Ja[illegible] | Signature: [signature] | Month 03 Day 12 Year 96

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: | Signature: | Month Day Year

19. Discrepancy Indication Space: Line 11a - Delete D001 (P.S.)

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

Printed/Typed Name: JOSE RUBEN ACEVEDO | Signature: [signature] | Month 03 Day 19 Year 96

DO NOT WRITE BELOW THIS LINE.

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802 WITHIN CALIFORNIA, CALL 1-800-852-7550

GENERATOR

TRANSPORTER

PROCESSING FACILITY

State of California Health and Welfare Agency

Department of Health Services
Toxic Substances Control Division
Sacramento, California

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD008339467
Manifest Document No.:
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: JERVIS B. WEBB COMPANY, 9301 RAYO AVE., LOS ANGELES, CA 90280
4. Generator's Phone: (213) 588-8271
State Manifest Document Number: 84889171
State Generator's ID: CAD008339467
State Transporter's ID: 84188
Transporter's Phone: 562-863-3187
State Transporter's ID:
Transporter's Phone:
State Facility's ID: CAT080033681
Facility's Phone: (213) 268-5056

5. Transporter 1 Company Name: JC INCORPERATED
6. US EPA ID Number: CAD058018367
7. Transporter 2 Company Name:
8. US EPA ID Number:

9. Designated Facility Name and Site Address: CHEM-TECH, 3650 E. 26th ST, VERNON, CA 90023
10. US EPA ID Number: CAT080033681

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. HAZARDOUS WASTE LIQUID N.O.S. ORM-E NA 9189	01	TT	05000	G	221
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above: STYSHEN NA 1760 TANK TREATMENT
K. Handling Codes for Wastes Listed Above: 01

15. Special Handling Instructions and Additional Information: E.R.G. #31 - AVOID CONTACT

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.

Printed/Typed Name: FRED A BREMER
Signature: [signature]
Date: Month Day Year 10 1 86

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: CARLOS RODRIGUEZ 58999
Signature: [signature]
Date: Month Day Year 10 01 86

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: EDDIE HERRERA PREM for Tyler
Signature: [signature]
Date: Month Day Year 10 01 86

Written copy sent to DOHS within 30 days
To: P.O. Box 3000, Sacramento, CA 95812

84889171

State of California—Health and Welfare Agency

Please Print or Type. (Form designed for use on elite (12 pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

11. Generator's US EPA ID Number: CA D 0 0 8 3 3 9 4 6 7

Manifest Document No.: 1 of 1

2. Page 1 of 1

Information in the shaded areas is not required by federal law.

3. Generator's Name and Mailing Address:
Jervis B. Webb Company of California
P.O. Box 60885 ; Los Angeles, Calif. 90058-0885

4. Generator's Phone (213) 588-8271

5. Transporter 1 Company Name: IT Corporation

6. US EPA ID Number: CA D 0 0 5 7 1 7 6 1 0

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address:
Casmallia Despoal
NTU Road
Casmallia, Calif.

10. US EPA ID Number: CA D 0 2 0 7 1 4 9 1 1 2 1 5

G. State Transporter's ID: 2564-1-1-2-7-9

H. Transporter's Phone

I. State Facility's ID: CAD982075813

J. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste, Hazardous Waste Solid, NOS, 4N9189	01	DM	1500	P	221
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

soil cont. with oil
Solvent, cutting oil

K. Handling Codes for Wastes Listed Above: 09

15. Special Handling Instructions and Additional Information

Gloves & Goggles

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 government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also 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 I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Fred A. Bremer — Signature: [signature] — Month Day Year: 10 15 3 0 8 6

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Richard Fuller — Signature: [signature] — Month Day Year: 10 15 3 0 8 6

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: P74398 CASMALIA RESOURCES Paulette Hopkins — Signature: Paulette Hopkins — Month Day Year: 10 10 0 2 8 6

DHS 8022-A (11/85)
(EPA 8700-22)

White - TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
to: P.O. Box 3000, Sacramento CA 95812

8649 1279

State of California Department of Health Services
Toxic Substances Control Division
Sacramento, California

Please Print or Type. (Form designed for use on elite (12-pitch) typewriter).

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD 005 3 94 62 | Manifest Document No. 7112 6 6 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Jervis B Webb Co.
9301 Naya Ave. Southgate, CA
4. Generator's Phone ( ) 213 564-1157

4. State Generator's Number: 87515015
5. State Generator's ID: H6H636-000553172

6. Transporter 1 Company Name: GI Waste Oil | US EPA ID Number: CAD981655269
7. Transporter 1 Company Name: | US EPA ID Number:
8. State Transporter's ID: 2030
9. Transporter's Phone: 213-944-6120
10. Transporter's Phone:

9. Designated Facility Name and Site Address
W & H Tank Lines
2202 Spring St.
Signal Hill, CA 90809
10. US EPA ID Number: CAD064037064 5
11. State Facility's ID: 04 09 4 9 3 3 0 6 4 5
12. Facility's Phone: 213-426-9030

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Waste Oil N.O.S. Combustible Liquid NA1270 California Regulated Waste Only	01	TT	00076	G	State 221 / EPA/Other
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Gear Oil, Lube Oil, Water

K. Handling Codes for Wastes Listed Above
a. H14 b. c. d.

15. Special Handling Instructions and Additional Information
Gloves & Goggles
8765851 2

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 government 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.

Printed/Typed Name: Fred R. Brewer | Signature: [signature] | Month Day Year: 11 21 1982

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Curtis Kissoff | Signature: [signature] | Month Day Year: 11 21 1982

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: | Signature: | Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] | Signature: [signature] | Month Day Year: 11 23 1982

EPA 8013 A (1/87)
EPA 8700-22
(Rev 9-86) Previous editions are obsolete

INSTRUCTIONS ON THE BACK

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802, WITHIN CALIFORNIA CALL 1-800-852-7550

State of California—Health and Welfare Agency
Form Approved OMB No. 2060-0039 (Expires 9-30-89)
Please print or type. (Form designed for use on elite (12 pitch typewriter))

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008339467 Manifest Document No.

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Jervis B. Webb Company
9301 Rayo Ave. Southgate, Ca.90280

4. Generator's Phone (213) 564-1157

A. State Manifest Document Number: 87515026

B. State Generator's ID: [illegible]

5. Transporter 1 Company Name: Sentinel Waste Management 14238

6. US EPA ID Number: CAD981982374

C. State Transporter's ID: 605172

D. Transporter's Phone: 213 802-2218

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
Casmalia Resources
P.O. Box E. NTU Rd.
Casmalia, Ca. 93427

10. US EPA ID Number: CAD020748125

G. State Facility's ID: CAD020748125

H. Facility's Phone: 805 937-8449

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste No.
"RQ" 100 lbs. Waste Flammable Solid,(D001)N.O.S.,Flammable Solid UN1325	2	DM	600	P	State 332 / EPA/Other D001
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

Dried paint filters, vermiculite. Materials contain less than 1% F series solvents. "RQ" 100 lbs, ignitability.

K. Handling Codes for Wastes Listed Above
a. 03 b.
c. d.

15. Special Handling Instructions and Additional Information
Gloves, goggles, organic respirator. Should spill occur over "RQ" of 100 lbs. report immediatly to National Response Center. 1-800-424-8802.

HAZARD GUIDE:
HEALTH 2
FLAMMABILITY 2
REACTIVITY 0

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 government 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.

Printed/Typed Name: RICHARD OCHOA Signature: Richard Ochoa Month Day Year: 12 30 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Manuel Martinez Jr Signature: Manuel Martinez Jr Month Day Year: 12 30 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Casmalia Resources Signature: Dennis Fraley Dennis Fraley Month Day Year: 12 30 87

GENERATOR / TRANSPORTER / FACILITY

DHS 8022 A (1/87) # 100007
EPA 8700-22
(Rev. 9-86) Previous editions are obsolete.

When TSDF SENDS THIS COPY TO DOHS WITHIN 20 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

INSTRUCTIONS ON THE BACK

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802, WITHIN CALIFORNIA CALL 1-800-852-7550

State of California Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-88)
Please print or type. (Form designed for use on elite (12-pitch typewriter).)

51220

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: CAD008389467 — Manifest Document No.: 11220
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
Jarvis B. Webb Company
9301 Rayo Ave. Southgate, Ca.90280
4. Generator's Phone: 213 564-1157

A. State Manifest Document Number: 87515035
B. State Generator's ID: [illegible]

5. Transporter 1 Company Name: Terminal Waste Management 14231
6. US EPA ID Number: CAD981982374
7. Transporter 2 Company Name:
8. US EPA ID Number:

C. State Transporter's ID: 805172
D. Transporter's Phone: 213 802-2218
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address:
Casmalia Resources
P.O. Box E. NTU Rd.
Casmalia, Ca. 93427
10. US EPA ID Number: CAD020748125

G. State Facility's ID: CAD020748125
H. Facility's Phone: 805 937-8449

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. "RQ" 100 lbs. Waste Flammable Solid,(D001)N.O.S.,Flammable Solid UN1325	2	DM	6100	P	State 352; EPA/Other D001
b.					State; EPA/Other
c.					State; EPA/Other
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above:
Dried paint filters, vermiculite. Materials contain less than 1% F series solvents. "RQ" 100 lbs, ignitability.

K. Handling Codes for Wastes Listed Above:
a. 03
b.
c.
d.

15. Special Handling Instructions and Additional Information:
Gloves, goggles, organic respirator. Should spill occur over "RQ" of 100 lbs. report immediatly to National Response Center. 1-800-424-8802.

HAZARD GUIDE:
HEALTH 2
FLAMMABILITY 2
REACTIVITY 0

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 government 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.

Printed/Typed Name: Christine Oehling — Signature: Christine Oehling — Month Day Year: 01 07 88

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Manuel Martinez Jr — Signature: Manuel Martinez — Month Day Year: 01 07 88

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Month Day Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: Casmalia Resources Alice Brown — Signature: Alice Brown — Month Day Year: 01 08 88

DHS 8022-4 (1/87)
EPA 8700-22 (Rev. 9-86) Previous editions are obsolete.

$100 250-

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

INSTRUCTIONS ON THE BACK

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

State of California - Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-90)

Department of Health Services
Toxic Substances Control Division
Sacramento, California

Please print or type. (Form designed for use on elite (12-pitch) typewriter).

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD 009 465 825
Manifest Document No.:
2. Page 1 of 1
Emergency Response Phone:
R7390216
3. Generator's Name and Mailing Address:
JERVIS B. WEBB COMPANY
9301 Nayo Ave. Southgate, CA 90280
4. Generator's Phone: (213) 566-1157
5. Transporter 1 Company Name: Sentinel Waste Management, Inc.
6. US EPA ID Number: CAD 981 820 76
7. Transporter 2 Company Name:
8. US EPA ID Number:
9. Designated Facility Name and Site Address:
Casmalia Resources
P.O. Box E NTU Road
Casmalia, CA 93429
10. US EPA ID Number: CAD 012 017 482 6
11. Facility's Phone: 805-937-8043

12. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	13. Containers No.	Type	14. Total Quantity	15. Unit Wt/Vol.	16. Waste No.
a. "RQ" 100 lbs Waste Flammable Solid, N.O.S. UN 1325 (D001)	1	CD M	6000	P	Waste: 681 Exponent: 7000
b.					State:
c.					State:
d.					State:

17. Additional Descriptions for Materials Listed Above:
Flammable Paint Sludge; solidified with vermiculite; waste contain less than 1% V. Series Warfarin R.P. 68 & "RQ" 100 lbs (Ignitability)

18. Handling Codes for Wastes Listed Above:
a. D5
b.

19. Special Handling Instructions and Additional Information:
Gloves, goggles, organic vapor respirator.
In the event of spill over 100 lbs Report Immediately to the National Response Ctr. 1800-424-8802

HAZARD GUIDE:
HEALTH 2
FLAMMABILITY 3
REACTIVITY 0

20. 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 government 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.

Printed/Typed Name: Christine Oehling
Signature: Christine Oehling
Month Day Year: 10 20 1988

21. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Manuel Martinez Jr.
Signature: Manuel Martinez Jr.
Month Day Year: 10 20 1988

22. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

23. Discrepancy Indication Space

24. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 23.
Printed/Typed Name: Casmalia Resources
Signature: Richard J. Fayne
Month Day Year: 10 24 1988

EPA Form 8700-22 (1-90)
DHS 8700-22 (Rev. 9-90) Previous editions are obsolete.

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3600, Sacramento, CA 95812

INSTRUCTIONS ON THE BACK

IN EVENT OF AN EMERGENCY ON SHIP, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802, WITHIN CALIFORNIA CALL 1-800-852-7550

1-800-374-9800

State of California Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-88)
Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: CAD008333416 7 8 10 3 1 8
Manifest Document No.
2. Page 1 of 3
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERVIS B. WEBB COMPANY
9301 Rayo Ave. Southgate, CA 90280
4. Generator's Phone (213) 564-1157

A. State Manifest Document Number: 87990461
B. State Generator's ID: [illegible]
5. Transporter 1 Company Name: Sentinel Waste Management, Inc.
6. US EPA ID Number: CAD981198234
D. State Transporter's ID: 805172
C. Transporter's Phone: 213-888-2218
7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
Casmalia Resources
P.O. Box E NTU Road
Casmalia, CA 93429
10. US EPA ID Number: CAD028748125
G. State Facility's ID: CAD028748125
H. Facility's Phone: 805-937-8449

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. "RQ" 100 Waste Flammable Solid, N.O.S. UN 1325 (D001)	014	DM	112000	P	State 352 / EPA/Other D001
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Solid waste: paint filters; solidified with vermiculite. Waste contain less than 10 E Series Wastes F.P. 68 F "RQ" 100 lbs (Ignitability)

K. Handling Codes for Wastes Listed Above
a. D2 b. c. d.

15. Special Handling Instructions and Additional Information
Gloves, goggles, organic vapor respirator.
In the event of spill over 100 lbs Report Immediately to the National Response Ctr. 1800-424-8802

HAZARD GUIDE:
HEALTH 2
FLAMMABILITY 3
REACTIVITY 0

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 government 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.

Printed/Typed Name: Signature: Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Manuel Martinez Jr. Signature: Manuel Martinez Jr. Month Day Year: 04 06 88

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: C. M. Oehling Signature: C. M. Oehling Month Day Year: 04 06 88

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19
Printed/Typed Name: Casmalia Resources Signature: Month Day Year: 04 07 88

DHS 8022 A (1/87) #103132 White: DHS sends this COPY TO TOXICS WITHIN 30 DAYS. INSTRUCTIONS ON THE BACK
EPA 8700-22 to P.O. Box 806, Sacramento, CA 95812
(Rev. 9-86) Previous editions are obsolete

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802 WITHIN CALIFORNIA CALL 1-800-852-7550

GENERATOR

TRANSPORTER

FACILITY

State of California Environmental Protection Agency
Form Approved OMB No. 2050-0039 Expires 9-30-96
Name (Line 1) Form designed (Line 2) (Spirit) Adhesive

See instructions on back of page 5.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008310867
Manifest Document No. 38729
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERCYS R. MOHR COMPANY OF CALIFORNIA
9201 BAYO
4. Generator's Phone (310) 868-8272

A. State Manifest Document Number 95738729
B. State Generator's ID
C. State Transporter's ID 014292
D. Transporter's Phone 909-984-9984

5. Transporter 1 Company Name
INDUSTRIAL WASTE UTILIZATION
6. US EPA ID Number CAD980585290
7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
RBO CHEM CORP
425 1STS AVE.
INGLEWOOD CA 90301
10. US EPA ID Number CAD008304432
G. State Facility's ID
H. Facility's Phone 213-776-6283

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste No.
a. NA 1993, PAINT RELATED MATERIAL, NOT RCRA HAZARDOUS WASTE SOLID,	003	DM	00600	P	332
b.					RCRA Code 3006 RCRA
c.					State Code
d.					State Code

J. Additional Descriptions for Materials Listed Above
(1)(a)-, DRIED PAINT 04-20%, PAINT RELATED 80%-100%

K. Handling Codes for Wastes Listed Above
a. 03
b.
c.
d.

15. Special Handling Instructions and Additional Information
(1)(a)-Approval #6000844. PROS - EMERGENCY CONTACT: 909-934-9984
CONTAINER SIZE: 55 gal

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 government regulations.

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Printed/Typed Name RANDY DUSTON Signature Month 03 Day 12 Year 96

17. Transporter 1 Acknowledgment of Receipt of Materials
Printed/Typed Name Victoriano Luis Signature Month 03 Day 12 Year 96

18. Transporter 2 Acknowledgment of Receipt of Materials
Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name Rebecca Sanchez Signature Rebecca Sanchez Month 03 Day 19 Year 96

DO NOT WRITE BELOW THIS LINE.

IN CASE OF EMERGENCY OR SPILL CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802 WITHIN CALIFORNIA, CALL 1-800-852-7550

95738729

To: Michel Iskarous, DTSC

Fax: (818) 717-6557 6527

Phone : (818) 717-6547

From: Lucy Lopez, DTSC

Phone: 925-828-3511

Total Pages including cover : ~~27~~ 12

Page 2 of 12

State of California Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 7-10-96)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008339467
Manifest Document No. 35729
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERVIS B. WEBB COMPANY OF CALIFORNIA
9301 RAYO
SOUTH GATE, CA 90280 213-580-8271

4. Generator's Site Address (if different than mailing address)

5. Transporter 1 Company Name
INDUSTRIAL WASTE UTILIZATION
6. US EPA ID Number
CAD982085293

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
RHO CHEM CORP
425 61ST AVE.
INGLEWOOD CA 90301
10. US EPA ID Number
CAD008354432

A. State Manifest Document Number 95738729
B. State Generator's ID
C. State Transporter's ID 07242
D. Transporter's Phone 909-984-9984
E. State Transporter's ID
F. Transporter's Phone
G. State Facility's ID
H. Facility's Phone 213-776-6233

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste Number
a. * PAINT FILTERS NON RCRA HAZARDOUS WASTE SOLID.	003	DM	00600	P	03 EPA/Other NON RCRA State
b.					EPA/Other State
c.					EPA/Other State
d.					EPA/Other State

J. Additional Descriptions for Materials Listed Above
[illegible], DRIED PAINT 0%-20%, PAINT FILTERS 80%-100%

K. Handling Codes for Wastes Listed Above
a. 03 b.
c. d.

15. Special Handling Instructions and Additional Information
[illegible]-Approval #600844, ERG#-
EMERGENCY CONTACT: 909-984-9984
CONTAINER SIZE: 55 gal

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 government regulations.

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Printed/Typed Name: RANDY DUSTON
Signature:
Month 03 Day 12 Year 96

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Victor Luis R.
Signature:
Month 03 Day 12 Year 96

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Confirmation of receipt of hazardous materials covered by the manifest except as noted in Item 19
Printed/Typed Name: Rebecca Sanchez
Signature: Rebecca Sanchez
Month 03 Day 19 Year 96

DO NOT WRITE BELOW THIS LINE.

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

DISTRIBUTION: WHITE - TRANSPORTER; YELLOW - DESTINATION; PINK - GENERATOR

State of California—Health and Welfare Agency
Form approved OMB No. 2050-0039 (Expires 9-30-88)
Please print or type. (Form designed for use on elite (12-pitch) typewriter)

Department of Health Services
Toxic Substances Control Division
Sacramento, California

Instructions on the Back

88028824

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802, WITHIN CALIFORNIA CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. C A D 0 0 8 3 3 9 4 6 7 — Manifest Document No. 8 1 2 1 2
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERVIS B. WEBB
4550 SEVILLE AVE., VERNON, CA 90058
4. Generator's Phone (213) 588-8271

A. State Manifest Document Number: 88028824
B. State Generator's ID:

5. Transporter 1 Company Name: SENTINEL WASTE MANAGEMENT, INC.
6. US EPA ID Number: C A D 9 8 2 3 6 8 7 8 9
C. State Transporter's ID: 90886660
D. Transporter's Phone: (714) 630-7629

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
RHO CHEM CORPORATION
425 ISIS AVE.
INGLEWOOD, CA 90301
10. US EPA ID Number: C A D 0 0 8 3 6 4 4 3 2
G. State Facility's ID
H. Facility's Phone: (213) 776-6233

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Container No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. WASTE 1,1,1-TRICHLOROETHANE, ORM-A, UN2831 (F001)	007	DM	1385	G	State 741 / EPA/Other F001
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
WASTE 1,1,1-TRICHLOROETHANE

K. Handling Codes for Wastes Listed Above
a. 01 b. c. d.

15. Special Handling Instructions and Additional Information
GLOVES, GOGGLES, TYVECKS, BOOTS, ORGANIC VAPOR RESPIRATOR.

HAZARD GUIDE:
HEALTH 3
FLAMMABILITY 1
REACTIVITY 1

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Printed/Typed Name: RANDY DUSTON — Signature: Randy Duston — Month Day Year: 1 1 2 1 9 8 8

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Errol Einboden — Signature: Errol Einboden — Month Day Year: 1 2 1 9 8 8

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Kevin Ryan — Signature: Kevin Ryan — Month Day Year: 1 1 1 5 1 8 8

DHS 8022 A (1/88)
EPA 8700-22
(Rev. 9-80) Previous editions are obsolete.

Do Not Write Below This Line

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 806, Sacramento, CA 95812

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Department of Health Services
Toxic Substances Control Division
Sacramento, California

Instructions on the Back

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008888666 — Manifest Document No.
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Jervis B. Webb Co., 9301 Rayo Ave., Southgate, CA 90280
4. Generator's Phone: (213) 514-1157
A. State Manifest Document Number: 88060812
B. State Generator's ID:
C. State Transporter's ID: 085173
D. Transporter's Phone: (714) 680-3020
E. State Transporter's ID: 4242-35
F. Transporter's Phone: (805) 930-0449
G. State Facility's ID:
H. Facility's Phone: (805) 237-0449

5. Transporter 1 Company Name: Sentinel Waste Management, Inc. — 6. US EPA ID Number: CAD982888667
7. Transporter 2 Company Name: Casmalia Resources — 8. US EPA ID Number: CAD982888674
9. Designated Facility Name and Site Address: Casmalia Resources, P.O. Box E, NTU Road, Casmalia, CA 93429 — 10. US EPA ID Number: CAD982888674

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	13. Type	14. Total Quantity	15. Unit Wt/Vol	J. Waste No.
A. "RQ" Hazardous Waste Solid, N.O.S., UN1325 (D001)	1	DM	8100	P	State 352; EPA/Other D001
b.					State; EPA/Other
c.					State; EPA/Other
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above: Solid Waste: Dried Paint Filters, Waste contains less than 1% F series Wastes "RQ" 100 lbs. (Ignitability).

K. Handling Codes for Wastes Listed Above: a. 03 b. c. d.

15. Special Handling Instructions and Additional Information: Gloves, Goggles, Organic Vapor Respirator. In the event of spill over 100 lbs. Report immediately to National Response Ctr. (800) 424-8802

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Printed/Typed Name: Christine Oehling — Signature: Christine Oehling — Month Day Year: 09 29 88

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Paul A. Saffell — Signature: Paul A. Saffell — Month Day Year: 09 29 88

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Douglas Emad — Signature: Douglas Emad — Month Day Year: 09 30 88

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Casmalia Resources — Signature: [illegible] — Month Day Year: 10 03 88

IN CASE OF AN EMERGENCY OR SPILL CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; CITIZEN CALIFORNIA CALL 1-800-852-7550

DHS 8022.A (1/88)
EPA 8700—22
(Rev. 9-80) Previous editions are obsolete.

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To: P.O. Box 3000, Sacramento, CA 95812

8901 11 0032 0471

State of California—Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 4-30-93)
(Please print or type. (Form designed for use on elite (12-pitch) typewriter)

See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: C A D 0 8 8 3 3 9 4 6 7 9 0 6 2 6
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERVIS B. WEBB
39091 RAYO AVENUE, SOUTH GATE, CA 90280
4. Generator's Phone 213 589-8271

A. State Manifest Document Number: 88377539
B. State Generator's ID

5. Transporter 1 Company Name: SENTINEL WASTE MANAGEMENT, INC.
6. US EPA ID Number: C A D 9 8 2 3 6 8 7 8 9
C. State Transporter's ID
D. Transporter's Phone (714) 838-7629

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
AMERICHEM, INC.
1737 E. DENNI STREET
WILMINGTON, CA 90744
10. US EPA ID Number: C A D 0 6 4 4 2 9 8 3 5
G. State Facility's ID: CAD044429835
H. Facility's Phone (213) 834-5131

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	Waste No.
a. "RQ" PAINT RELATED MATERIAL, FLAMMABLE LIQUID, NA1263 "RQ" 199 LBS.	0 6 7	D M	1 3 0 0	G	State 461 / EPA/Other D001
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
OIL BASED PAINTS WITH CHLORINATED SOLVENTS, UNUSED/ UNSPENT OUTDATED MATERIALS.

K. Handling Codes for Wastes Listed Above
a. 01
b.
c.
d.

15. Special Handling Instructions and Additional Information
GLOVES, GOGGLES, TYVEKS, ORGANIC VAPOR RESPIRATOR.
(SHOULD SPILL OCCUR OVER "RQ" LIMIT, IMMEDIATELY NOTIFY THE NATIONAL RESPONSE CENTER @ (800) 442-8802.)

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Printed/Typed Name: RANDY DUSTON
Signature: Randy Duston
Month Day Year: 06 20 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Richard Espinoza
Signature: Richard Espinoza
Month Day Year: 6 20 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space
2 DRUMS SOLD

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: CHAD GOUBEAT
Signature
Month Day Year: 06 26 89

Do Not Write Below This Line

DHS 8022 A (1/88)
SPA 8100-22
(New Sheet Previous editions are obsolete)

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS.
Tel. P.O. Box 3000, Sacramento, CA 95812

0626019-025

IN CASE OF AN EMERGENCY OR SPILL CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802, WITHIN CALIFORNIA CALL 1-800-852-7550

88377539

30-day suspense

Pink: Generator

Yellow: Transporter

Green: TSDF

State of California—Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 6-30-91)
Please print or type. (Form designed for use on elite (12-pitch) typewriter)

See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

California Hazardous Waste Manifest No. C A 0 0 0 0 3 3 9 4 6 7 — Page 1 of 1

Information in the shaded areas is not required by Federal law.

1. Generator's Name and Mailing Address: JERVIS B. WEBB, 9301 RAYO AVENUE, SOUTH GATE, CA 90280
4. Generator's Phone: 213 588-8271
A. State Manifest Document Number: 8837540
B. State Generator's ID:
2. Transporter 1 Company Name: SENTINEL WASTE MANAGEMENT, INC.
6. US EPA ID Number: C A D 0 9 8 2 3 6 8 7 8 9
C. State Transporter's ID:
D. Transporter's Phone: (714) 688-2629
3. Transporter 2 Company Name: [illegible]
7. US EPA ID Number: [illegible]
E. State Transporter's ID: [illegible]
F. Transporter's Phone: [illegible]
9. Designated Facility Name and Site Address: CASMALIA RESOURCES, P.O. BOX 8, NTO ROAD, CASMALIA, CA 93429
10. US EPA ID Number: C A D 0 2 0 7 4 8 1 2 5
G. State Facility's ID: C A D 0 2 0 7 4 8 1 2 5
H. Facility's Phone: (805) 937-8449

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. CALIFORNIA REGULATED WASTE ONLY (SPENT PETROLEUM OIL & WATER)	005	DM	500	Y	State 352 / EPA/Other EXEM
b. "RQ" WASTE CORROSIVE SOLID, N.O.S., UN1759 CORROSIVE (ALKALINE)	005	DM	500	Y	State 181 / EPA/Other D002
c. CALIFORNIA REGULATED WASTE ONLY (LATEX PAINT)	005	DM	500	Y	State 352 / EPA/Other EXEM
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
11..B ETHANOLAMINE SOLIDIFIED WITH VERMICULITE
11..C LATEX PAINT SOLIDIFIED WITH VERMICULITE

K. Handling Codes for Wastes Listed Above: a. 03 b. 03 c. 03 d.

15. Special Handling Instructions and Additional Information: PROTECTIVE CLOTHING

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 government regulations.

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Printed/Typed Name: RANDY DUSTON — Signature: Randy Duston — Month Day Year: 06 20 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Richard Espinoza — Signature: Richard Espinoza — Month Day Year: 6 20 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: DENNIS KISSEU — Signature: [illegible] — Month Day Year: 10 6 2087

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: LAWRENCE LESOURE — Signature: Lawrence Mezzo — Month Day Year: 06 26 89

Do Not Write Below This Line

DHS 8022 A (1-89)
EPA 8700-22
Sides B Not Printed and Instructions

WHITE: TSDF LEADS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

S9907 J4 0089 0555

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; within California CALL 1-800-852-7550

8837540

20-1-2-3-4-5-6-7-8-9

Page 20 of 27 — 0 2 8

State of California—Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-87)
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Rear BTX

See Instructions on Back of Page 6 and Front of Page 7

9602460598 9602460598

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: CAD008339467 — Manifest Document No: 021121
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: JERVIS B. WEBB INDUSTRIES, 9301 BAYO AVE., SOUTHGATE, CA. 90280
4. Generator's Phone (213) 588-8271

A. State Manifest Document Number: 88696862
B. State Generator's ID: HGH036-0053 97

5. Transporter 1 Company Name: WASTE MATERIALS MANAGEMENT — 6. US EPA ID Number: CAD982515868
C. State Transporter's ID: 002780
D. Transporter's Phone: (714) 979-5000

7. Transporter 2 Company Name: UNITED PUMPING SERVICE — 8. US EPA ID Number: CAD072953771
E. State Transporter's ID:
F. Transporter's Phone: (818) 961-9326

9. Designated Facility Name and Site Address: US ECOLOGY, INC., HIGHWAY 95, 12 MILES SOUTH OF BEATTY, NEVADA — 10. US EPA ID Number: NVT33-001-0000
G. State Facility's ID:
H. Facility's Phone: (800) 626-5317

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	15. Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA 9189, D008	016	DM	04800	P	State 461; EPA/Other D008
b. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA 9189, D008	003	DM	00450	P	State 461; EPA/Other D008
c. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA 9189, D008	001	DM	00250	P	State 461; EPA/Other D008
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above:
A. WASTE PAINT, WATER, ABSORBANTS
B. WASTE PAINT FILTERS
C. WASTE RAGS

K. Handling Codes for Wastes Listed Above: a. b. c. d.

15. Special Handling Instructions and Additional Information:
GLOVES, GOGGLES
1. WS # 07-005-2154
2. WS # 07-005-2162
3. WS # 07-005-2170

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 government 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.

Printed/Typed Name: Christine Oehling — Signature: Christine Oehling — Month Day Year: 02 16 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Nicolas Montano — Signature: Nicolas Montano — Month Day Year: 02 16 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Hector Santana — Signature: Hector Santana — Month Day Year: 02 16 90

19. Discrepancy Indication Space
Total Quantity listed incorrect. Actual Quantity received. 13-14a) 3732 P, 15-14b) 3739, 13-14c) 196 P.

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19
Printed/Typed Name: Michael K. Stucker — Signature: [signature] — Month Day Year: 02 16 90

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802 WITHIN CALIFORNIA CALL 1-800-852-7550

88696862

DHS 8022 A (1/88)
EPA 8100-22
(Rev. 2-88) Previous editions are obsolete

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State of California—Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 4-30-91)
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See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: C A D 0 0 8 3 3 9 4 6 7
Manifest Document No.: 0 5 1 0 1 2
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERVIS B. WEBB INDUSTRIES
9301 RAYO AVE. SOUTHGATE, CA. 90280
4. Generator's Phone: (213) 588-8271

A. State Manifest Document Number: 88697065
B. State Generator's ID: H G H 0 2 6-0 0 5 3 1 9 7 1

5. Transporter 1 Company Name: ~~WASTE MATERIALS MANAGEMENT~~
6. US EPA ID Number: ~~C A D 9 8 2 5 1 5 8 6 8~~
C. State Transporter's ID: 102223
D. Transporter's Phone: (714) 979-5300

7. Transporter 2 Company Name: UNITED PUMPING SERVICE, INC.
8. US EPA ID Number: C A D 0 7 2 9 5 3 7 7 1
E. State Transporter's ID: 605 [illegible]
F. Transporter's Phone: (818) 961-9326

9. Designated Facility Name and Site Address
US ECOLOGY, INC.
HIGHWAY 95
12 MILES SOUTH OF BEATTY, NEVADA
10. US EPA ID Number: N V T 3 3 0 0 1 0 0 0 1 0
G. State Facility's ID:
H. Facility's Phone: (800) 626-6317

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA 9189, 0008	011	DM	02750	P	State 461 EPA/Other 0008
b. CALIFORNIA REGULATED ONLY ~~HAZARDOUS WASTE SOLID, N.O.S., ORM-E, NA 9189, 0008~~ NON-RCRA HAZARDOUS WASTE SOLID	001	DM	00250	P	State 461 EPA/Other 0008
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
A. WASTE PAINT, WATER, ABSORBANTS
B. WASTE RAGS

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
GLOVES, GOGGLES
1. WS # 07-005-2154
2. WS # 07-005-2170

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 government 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.

Printed/Typed Name: RANDY DUSTON
Signature: Randy Duston
Month Day Year: 05 14 90

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: NICOLAS MONTANO
Signature: Nicolas Montano
Month Day Year: 05 14 90

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space: DOT description block 11b. corrected per generator's instructions.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: R. David [illegible]
Signature:
Month Day Year: 05 18 90

Do Not Write Below This Line

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802 WITHIN CALIFORNIA CALL 1-800-852-7550

88697065

DHS 6022 A (11/88)
EPA 8700-22
(Rev. 9-88) Previous editions are obsolete.

Keep this copy for your records.

Mail this copy to DOHS within 30 days
P.O. Box 2000, Sacramento, CA 95809

State of California—Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-91)
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See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD008339462 — Manifest Document No.: 091141
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
J.B. WEBB
9301 RAYO AVE. SOUTHGATE, CA. 90208
4. Generator's Phone (213) 588-8271

A. State Manifest Document Number: 89482408
B. State Generator's ID: HG4036-005397
C. State Transporter's ID: 009920
D. Transporter's Phone: (714) 541-5500
E. State Transporter's ID:
F. Transporter's Phone:

5. Transporter 1 Company Name: WASTE MATERIALS MANAGEMENT — 6. US EPA ID Number: CAD982515868
7. Transporter 2 Company Name: ENVIRONMENTAL WASTE TECHNOLOGY — 8. US EPA ID Number: CAD982361057
9. Designated Facility Name and Site Address:
CASMALIA RECOURES
P.O. BOX E. NTU RD.
CASMALIA, CA. 93429
10. US EPA ID Number: CAD020748125
G. State Facility's ID: CAD020748125
H. Facility's Phone: (805) 937-8449

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste No.
a. WASTE FLAMMABLE SOLID N.O.S UN1325 0001	02	DM	150	P	State 461 / EPA/Other 0001
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above:
A. WASTE RAGS FROM CLEANING SPRAY GUNS

K. Handling Codes for Wastes Listed Above: a. 03 b. c. d.

15. Special Handling Instructions and Additional Information:
GLOVES AND GOGGLES — APPROVAL # 26909601 K.G.

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 government 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.

Printed/Typed Name: Christine Oehling — Signature: Christine Oehling — Month Day Year: 09 20 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Nicolas Montaño — Signature: Nicolas Montaño — Month Day Year: 09 20 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: JEFF REYNOLDS ARLAN BASHAH — Signature: Jeff Reynolds [signature] — Month Day Year: 09 28 89

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19
Printed/Typed Name: 122248 CASMALIA RESOURCES — Signature: [signature] — Month Day Year: 10 04 89

IN CASE OF AN EMERGENCY DR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802, WITHIN CALIFORNIA CALL 1-800-852-7550

89482408

DHS 8022 A (1/88)
EPA 6700-22
(Rev. 9/88) Previous editions are obsolete.

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Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CA0008139167
Manifest Document No.: 019114 12
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
J.B. WEBB
9301 RAYO AVE. SOUTHGATE, CA. 90208
4. Generator's Phone: 213 588-8271

A. State Manifest Document Number: 89482409
B. State Generator's ID: HGM036-10015391
C. State Transporter's ID: 8092920

5. Transporter 1 Company Name: WASTE MATERIALS MANAGEMENT
6. US EPA ID Number: CA D 9 8 2 5 1 5 8 5 8
D. Transporter's Phone: (714) 581-5580

7. Transporter 2 Company Name: ENVIRONMENTAL WASTE TECHNOLOGY
8. US EPA ID Number: CA D 9 8 7 3 6 1 0 5 7
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
CASMALIA RECOURES
P.O. BOX E. NTU RD.
CASMALIA, CA. 93429
10. US EPA ID Number: CA D 0 0 2 0 7 4 8 1 2 5
G. State Facility's ID: CAD982487125
H. Facility's Phone: (805) 937-8148

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste No.
a. WASTE FLAMMABLE SOLID N.O.S. UN1325 0001	1	42 DM	1250	P	State 461 EPA/Other 0001
b.					State EPA/Other
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
A. PAINT FILTERS

K. Handling Codes for Wastes Listed Above
a. Q3
b.
c.
d.

15. Special Handling Instructions and Additional Information
GLOVES AND GOGGLES
APPROVAL #26909602 KG

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 government regulations.

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Printed/Typed Name: Christine Oehling
Signature: Christine Oehling
Month Day Year: 09 12 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Nicolas Montaño
Signature: Nicolas Montaño
Month Day Year: 09 12 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: JEFF REYNOLDS ARLAN BASYAH
Signature: [illegible] [illegible]
Month Day Year: 09 12 89

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: 9-12-89 CASMALIA RESOURCES
Signature: [illegible]
Month Day Year: 09 12 89

IN CASE OF AN EMERGENCY OR SPILL CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802, WITHIN CALIFORNIA CALL 1-800-852-7550

89482409

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OMB 8022 A (1/90)
EPA 8700-22
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Department of Health Services
Toxic Substances Control Division
Sacramento, California

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UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CA D 0 0 0 8 3 3 9 4 6 7 — Manifest Document No.: 0 0 9 2 8 2
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
J.B. WEBB
9301 RAYO AVE. SOUTHGATE, CA. 90208
4. Generator's Phone: (213) 888-8271

A. State Manifest Document Number: 89482416
B. State Generator's ID: N/A
C. State Transporter's ID: 00 7920
D. Transporter's Phone: (714) 541-5500

5. Transporter 1 Company Name: WASTE MATERIALS MANAGEMENT
6. US EPA ID Number: CA D 0 9 8 2 5 1 5 1 6 8
7. Transporter 2 Company Name: ENVIRONMENTAL WASTE TECHNOLOGY
8. US EPA ID Number: CA D 0 9 9 2 8 5 5 7
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address:
CASMALIA RECOURES
P.O. BOX E NTU RD.
CASMALIA, CA. 93429
10. US EPA ID Number: CA D 0 0 1 2 0 7 4 8 1 2 5
G. State Facility's ID: CAD020748125
H. Facility's Phone: (805) 937-8449

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. WASTE FLAMMABLE SOLID N.O.S. UN1325 D001	1 6	DM	1 5 0 0	P	State 461 EPA/Other D001
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above: A. PAINT, WATER, ABSORBANT
K. Handling Codes for Wastes Listed Above: a. 03 b. c. d.

15. Special Handling Instructions and Additional Information:
GLOVES AND GOGGLES
APPROVAL # 271094B K.G.

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 government regulations.
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Printed/Typed Name: Christine Oehling — Signature: Christine Oehling — Month Day Year: 10 9 2 8 8 9

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: NICOLAS MONTANO — Signature: Nicolas Montano — Month Day Year: 10 9 2 8 8 9

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: JEFF REYNOLDS ARMAN BASYAH — Signature: [illegible] — Month Day Year: 10 9 2 8 8 9

19. Discrepancy Indication Space:

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: IGNACIO BERMUDEZ — Signature: [illegible] — Month Day Year: 10 09 89

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Form 8022-1 (1-88)
(Rev. 4-88) Previous editions are obsolete.

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89482416

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; within CALIFORNIA CALL 1-800-852-7550

DESTINATION

TRANSPORTER

GENERATOR

To: Michel Iskarous, DTSC

Fax: (818) 717-6557 6527

Phone : (818) 717-6547

From: Lucy Lopez, DTSC

Phone: 925-828-3511

Total Pages including cover : 27 7

Part 3 of 7

State of California — Health and Welfare Agency
Form Approved (See No. 2400 - Other Instructions Sent)
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See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CA D 0 0 8 3 9 4 6 7 0 9 2 8 3
Manifest Tracking Document No.
2. Page 1 of 1
Information in the shaded areas is not required by federal law.

3. Generator's Name and Mailing Address
J.B. WEBB
5301 RAYO AVE. SOUTHGATE, CA. 90208
4. Generator's Phone 213 588-8271

A. State Manifest Document Number 88492417
B. State Generator's ID HIGH 0 3 6 0 0 5 3 9 7

5. Transporter 1 Company Name: WASTE MATERIALS MANAGEMENT
6. US EPA ID Number CA D 0 9 8 2 8 1 5 8 6 8
C. State Transporter's ID 007920
D. Transporter's Phone (714) 961-8500

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
RHO CHEM
425 ISIS AVE.
INGELWOOD, CA. 90301
10. US EPA ID Number CA D 0 0 8 1 6 4 4 3 2
G. State Facility's ID
H. Facility's Phone (213) 776-8833

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	Waste No.
a. WASTE FLAMMABLE LIQUID N.O.S. UN1993 F001	1 1	DM	1 1 3 1 0	G	State 241 EPA/CERCLA F001
b.					State EPA/CERCLA
c.					State EPA/CERCLA
d.					State EPA/CERCLA

J. Additional Descriptions for Materials Listed Above
A. citrikleen- solvent

K. Handling Codes for Wastes Listed Above
a. 01
b.
c.
d.

15. Special Handling Instructions and Additional Information
GLOVES AND GOGGLES

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 government regulations.

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Printed/Typed Name: Christine Oehling
Signature: Christine Oehling
Month Day Year: 10 9 2 8 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Nicolas Montoya
Signature: Nicolas Montoya
Month Day Year: 10 9 2 8 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: GREG WATSON
Signature
Month Day Year: 10 11 89

Form A (1/88)
Prior Editions are obsolete.

Do Not Write Below This Line

White, TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

NATIONAL POISON CENTER 1-800-876-4766 HOTLINE CALIFORNIA ONLY 1-800-222-1222
DO NOT DETACH
TSDF RETAINS COPY 2

4760

State of California—Health and Welfare Agency
Form Approved OMB No. 2060-0039 (Expires 9-30-91)
Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Instructions on Back of Page 8 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008339467 Manifest

2. Page 1 of 1

Information in the shaded areas is not required for Federal use.

3. Generator's Name and Mailing Address
JEWIS B. WEBB INDUSTRIES
9301 MAYO AVE., SOUTHGATE, CA. 90280

4. Generator's Phone (213) 588-8271

4. State Manifest Document Number 89938213

5. State Generator's ID

6. Transporter 1 Company Name
WASTE MATERIALS MANAGEMENT

6. US EPA ID Number CAD982515868

7. State Transporter's ID 108723

7. Transporter's Phone (714) 979-5000

8. Transporter 2 Company Name
UNITED PUMPING SERVICE, INC.

8. US EPA ID Number CAD072953771

9. State Transporter's ID

9. Transporter's Phone (818) 961-9325

10. Designated Facility Name and Site Address
US ECOLOGY, INC.
HIGHWAY 95
12 MILES SOUTH OF BEATTY, NEVADA

10. US EPA ID Number NVD 9 8 0 8 9 0 0 0 0 1

11. State Facility's ID

11. Facility's Phone (800) 999-7160

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. CALIFORNIA REGULATED WASTE ONLY (NON RCRA HAZARDOUS WASTE SOLID)	01	DM	02400	P	State 461 EPA/Other EXEMPT
b. CALIFORNIA REGULATED WASTE ONLY (NON RCRA HAZARDOUS WASTE SOLID)		DM			State 461 EPA/Other EXEMPT
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
A. WASTE PAINT, WATER, ABSORBANTS
B. WASTE RAGS

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
GLOVES, GOGGLES
1. WS # 07-005-2154
2. WS # 07-005-2170

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Printed/Typed Name: JIM MILLER Signature: [signature] Month Day Year: 092490

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: James Curdo Signature: [signature] Month Day Year: 092090

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Carolyn Corkost Signature: [signature] Month Day Year: 092090

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michael E. Stratton Signature: [signature] Month Day Year: 10 9 12 4 90

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EPA 8700-22
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89938213

State of California—Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 4-30-91)
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See Instructions on Back of Page 6 and Front of Page 7

0607

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008339467 — Manifest Document No. 021113

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERVIS B. WEBB INDUSTRIES
9301 RAYO AVE., SOUTHGATE, CA. 90280

4. Generator's Phone (213) 588-8271

A. State Manifest Document Number: 89938412

B. State Generator's ID:

5. Transporter 1 Company Name: WASTE MATERIALS MANAGEMENT — 6. US EPA ID Number: CAD982515868

C. State Transporter's ID: 102773

D. Transporter's Phone: (714) 979-5000

7. Transporter 2 Company Name: CALIFORNIA CHEMICAL DISPOSAL, INC. — 8. US EPA ID Number: CAD980735531

E. State Transporter's ID:

F. Transporter's Phone: (213) 834-8077

9. Designated Facility Name and Site Address: US ECOLOGY, INC.
HIGHWAY 95
12 MILES SOUTH OF BEATTY, NEVADA — 10. US EPA ID Number: NVT33-001-0000

G. State Facility's ID:

H. Facility's Phone:

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	Waste No.
a. WATER AND PAINT-(NON RCRA HAZARDOUS WASTE SOLID)	010	DM	02000	P	State 461 / EPA/Other
b. RAGS AND PAINT-(NON RCRA HAZARDOUS WASTE SOLID)	002	DM	00200	P	State 461 / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
a. WASTE PAINT, WATER, ABSORBANTS
b. WASTE RAGS

K. Handling Codes for Wastes Listed Above: a. b. c. d.

15. Special Handling Instructions and Additional Information
WEAR APPROPRIATE CLOTHING
1. WS# 07-005-2154
2. WS# 07-005-2170

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 government regulations.

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Printed/Typed Name: DALE R. DUSTIN — Signature: Dale R. Dustin — Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: James Curdo — Signature: James Curdo — Month Day Year: 021391

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Larry Villalobos — Signature: Larry Villalobos — Month Day Year: 021391

19. Discrepancy Indication Space
Actual quantity recieved 13a) 3269
b) 327

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: John Westleigh — Signature: [signature] — Month Day Year: 021591

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802 WITHIN CALIFORNIA CALL 1-800-852-7550

89938412

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Generation Health Services
Local Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD009339467
Manifest Document No.: 11141
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
JERVIS B. WEBB CO. OF CALIFORNIA
9301 RAYO AVENUE, SOUTHGATE, CA. 90208
4. Generator's Phone: 213 588-8271

5. State Manifest Document Number: 89938543
6. State Generator's ID:

7. Transporter 1 Company Name: WASTE MATERIALS MANAGEMENT
8. US EPA ID Number: CAD982515868
9. State Transporter's ID: 209375
10. Transporter's Phone: (714) 979-5000

7. Transporter 2 Company Name:
8. US EPA ID Number:
9. State Transporter's ID:
10. Transporter's Phone:

9. Designated Facility Name and Site Address:
STATEWIDE ENVIRONMENTAL SERVICES
2618 SOUTH MAIN STREET
LOS ANGELES, CA. 90061
10. US EPA ID Number: CAD000088262
11. State Facility's ID:
12. Facility's Phone:

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	15. Waste No.
a. NON RCRA HAZARDOUS WASTE SOLID	004	DM	01000	P	State 461 EPA/Other
b. NON RCRA HAZARDOUS WASTE SOLID	002		00150	P	State 461 EPA/Other
c.					State EPA/Other
d.					State EPA/Other

16. Additional Descriptions for Materials Listed Above:
a. PAINT, WATER, ABSORBANT
b. PAINT CONTAMINATED RAGS & ABSORBANT

17. Handling Codes for Wastes Listed Above:
a. 14/03
b. 14/03

18. Special Handling Instructions and Additional Information:
WEAR APPROPRIATE CLOTHING & SAFETY EQUIPMENT #PM-2748

19. 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 government regulations.

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Printed/Typed Name: RANDY DUSTON
Signature: Randy Duston
Month Day Year: 11 14 91

20. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: James Curdo
Signature: James Curdo
Month Day Year: 11 14 91

21. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: James Curdo
Signature:
Month Day Year:

22. Discrepancy Indication Space:

23. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19
Printed/Typed Name: [illegible]
Signature: [illegible]
Month Day Year: 11 14 91

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER, 800-424-8802 WITHIN CALIFORNIA CALL 800-852-7550

89938543

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EPA 8/93
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Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: C A D 0 0 8 3 3 9 4 6 7 — Manifest Document No.: 46902
2. Page 1 of 2 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
JERVIS B. WEBB CO.
9301 S. RAYO, SOUTHGATE, CA 90208
4. Generator's Phone (213) 588-8271

A. State Manifest Document Number: 90846902
B. State Generator's ID:

5. Transporter 1 Company Name: INDUSTRIAL WASTE UTILIZATION — 6. US EPA ID Number: C A D 9 8 0 5 8 5 2 9 3
C. State Transporter's ID: 320977
D. Transporter's Phone: 714-984-9984

7. Transporter 2 Company Name: USPCI — 8. US EPA ID Number: T X D 9 8 8 0 5 2 4 9 4
E. State Transporter's ID: 314385
F. Transporter's Phone: 713-350-7228

9. Designated Facility Name and Site Address:
USPCI
3 MI EAST, 7 MI NORTH OF EXIT 41 OFF I-80
CLIVE, UT 84074
10. US EPA ID Number: U T D 9 9 1 3 0 1 7 4 8
G. State Facility's ID:
H. Facility's Phone: 801-595-3900

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	I. Waste No.
a. NON RCRA HAZARDOUS WASTE SOLID	001	DM	00400	P	State 223 / EPA/Other NON RCRA
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above:
11A. DEBRIS 0-50%, OIL 15-25%, GREASE 10-30%, ABSORBENTS 0-40%

K. Handling Codes for Wastes Listed Above: a. 03 dof b. c. d.

15. Special Handling Instructions and Additional Information:
11A. CM91-0876 EMERGENCY CONTACT: 714-934-9984
Gloves, Glasses

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 government regulations.
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Printed/Typed Name: J. MILLER — Signature: [signature] — Month Day Year: 11 11 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Victor R Luis Jr — Signature: [signature] — Month Day Year: 11 11 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible] — Signature: [signature] — Month Day Year: 11 11 92

19. Discrepancy Indication Space:

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19: 925-15695
Printed/Typed Name: Anthony C. [illegible] — Signature: [signature] — Month Day Year: 11 11 92

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90846902

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Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD 008 093 467 — Manifest: 9/25/03
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
JERVIS B. WEBB CO.
9301 S. RAYO, SOUTHGATE, CA 90208
4. Generator's Phone (213) 588-8271

A. State Manifest Document Number: 90846903
B. State Generator's ID:

5. Transporter 1 Company Name: INDUSTRIAL WASTE UTILIZATION — 6. US EPA ID Number: CAD 981 850 293
C. State Transporter's ID: 320 973
D. Transporter's Phone: 714-984-9984

7. Transporter 2 Company Name — 8. US EPA ID Number
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
U.S. ECOLOGY
HWY 95 AT 18 MILES
BEATTY, NV 89003
10. US EPA ID Number: NVT330010000
G. State Facility's ID:
H. Facility's Phone: 702-553-2203

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. NON RCRA HAZARDOUS WASTE SOLID	001	DM	00200	P	State 352; EPA/Other NON RCRA
b.					State; EPA/Other
c.					State; EPA/Other
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above: 11A: RACS 60-90%, PAINT 0-10%, ABSORBENT 5-20%

K. Handling Codes for Wastes Listed Above: a. b. c. d.

15. Special Handling Instructions and Additional Information
11A: WSA 07-005-2170 EMERGENCY CONTACT: 714-984-9984
Gloves, Glasses

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 government regulations.

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Printed/Typed Name: J. MILLER — Signature: [signature] — Month Day Year: 11/6/92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Victor R Luis Jr — Signature: [signature] — Month Day Year: 11/6/92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Phil Hiers — Signature: [signature] — Month Day Year: 11/6/92

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90846903

NOV 1 4 1994

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: Jervis B. Webb Co **EPA ID#:** CAD 008339467

Alias Site Names: Jervis B. Webb Company of California

City: South Gate **County or Parish:** Los Angeles **State:** CA

Refer to Report Dated: 7/1/94 **Report type:** PA/SI

Report developed by: Bechtel Environmental, Inc.

DECISION:

| | **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

| | 1a. Site does not qualify for further remedial site assessment under CERCLA (Site Evaluation Accomplished - SEA)

| | 1b. Site may qualify for further action, but is deferred to: | | RCRA | | NRC

|X| **2. Further Assessment Needed Under CERCLA:** 2a. (optional) Priority: | | Higher |X| Lower

2b. Activity Type: | | PA |X| ESI | | SI | | HRS evaluation

| | Other: _____

DISCUSSION/RATIONALE:

Report Reviewed, Approved, and Site Decision Made by: Philip Armstrong **Signature:** [signature] **Date:** 9/30/94

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

Site Name: Jervis B. Webb Co **EPA ID#:** CAD 008339467

Alias Site Names: Jervis B. Webb Company of California

City: South Gate **County or Parish:** Los Angeles **State:** CA

Refer to Report Dated: 7/1/94 **Report type:** PA/SI

Report developed by: Bechtel Environmental, Inc.

DECISION:

| | **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

| | 1a. Site does not qualify for further remedial site assessment under CERCLA (Site Evaluation Accomplished - SEA)

| | 1b. Site may qualify for further action, but is deferred to: | | RCRA | | NRC

| | **2. Further Assessment Needed Under CERCLA:** 2a. (optional) Priority: | | Higher | | Lower

2b. Activity Type: | | PA | | ESI | | SI | | HRS evaluation

| | Other: _____

DISCUSSION/RATIONALE:

Report Reviewed, Approved, and Site Decision Made by: _____ **Signature:** _____ **Date:** _____

11/7/94

11:30.

Jim Quist
U.S. EPA Site Evaluation & Grants Section
(415) 744-2331.

SUBJECT: Kustom Fit Hi-Tech Seating Products, Inc. & Jessie B. Webb Company.

The final recommendation was not noted on the PA/SI report for the above two sites. I contacted Jim Quist of EPA. He stated that by mistake they did not put the recommendation. He replied that EPA recommended low priority further studies. Therefore, DPA is still the lead agency.

A191 0005

Bechtel

50 Beale Street
San Francisco, CA 94105-1895
Mailing address: P.O. Box 193965
San Francisco, CA 94119-3965

Preliminary Assessment/Site Inspection

Site: Jervis B. Webb Co.
(a.k.a. Jervis B. Webb Company of California)
9301 Rayo Ave.
South Gate, CA 90280

Site EPA ID Number: CAD 008339467

Work Assignment Number: 60-15-9JZZ, ARCSWEST Program

Submitted to: Philip Armstrong
Work Assignment Manager
EPA Region IX

Date: September 1, 1994

Prepared by: I-Pei Hsiu Hodge

Review and Concurrence: Catherine C. Walton

Bechtel Environmental, Inc.

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA), Region IX, under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), has tasked Bechtel Environmental, Inc. (BEI) to conduct a preliminary assessment/site inspection (PA/SI) of the Jervis B. Webb Co. (Jervis) site in South Gate, Los Angeles County, Calif.

The Jervis site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on May 14, 1993 (CAD 008339467) (1).

A preliminary assessment consultation memorandum (PACM) of the Jervis site was completed for the EPA by BEI on August 1, 1994 (2). The purpose of the PACM was to review existing information on the site and its environs to assess the threat(s), if any, posed to public health, welfare, or the environment, and to determine if further action under CERCLA/SARA is warranted.

After reviewing the PACM, the EPA decided that further investigation of the Jervis site would be necessary to more completely evaluate the site using the EPA's Hazard Ranking System (HRS) criteria. The HRS assesses the relative threat associated with actual or potential releases of hazardous substances at the site. The HRS has been adopted by the EPA to help set priorities for further evaluation and eventual remedial action at hazardous waste sites. The HRS is the primary method of determining a site's eligibility for placement on the National Priorities List (NPL). The NPL identifies sites at which the EPA may conduct remedial response actions. This report summarizes the results of the PA/SI of the Jervis site.

1.1 Apparent Problem

The apparent problem at the site is as follows:

- Jervis has operated a conveyer manufacturing shop at the site since the 1950s. Undocumented quantities of oil-based paint wastes were generated on site in a former 8,000-gallon water and paint sump. Paints used on site have contained lead chromate. The Jervis site is located in an industrial area within the area of a known groundwater contamination plume of trichloroethene (TCE) and tetrachloroethene, also known as perchloroethene (PCE). No soil or groundwater sampling has been conducted at the Jervis site. (3,4)

2.0 SITE DESCRIPTION

2.1 Location

The Jervis site has two street addresses: 9301 Rayo Ave. and 5030 Firestone Blvd., both in South Gate, Calif. The geographic coordinates for the site are 33° 57' 01.0" N latitude and 118° 10' 37.0"

W longitude (Township 2 South, Range 12 West, Mount Diablo Baseline and Meridian, South Gate, Calif., 7.5-minute quadrangle) (5). The location of the site is shown in Figure 2-1.

2.2 Site Description

The site occupies approximately 2.5 acres in an industrial area. The site is bordered on the north by Firestone Boulevard, on the west by Union Pacific Railroad tracks, on the south by Rayo Avenue, and on the east by a plastic container manufacturing company. Adjacent to the west side of the site, across Union Pacific's railroad tracks, are Macleod Metals, Inc. and Firma, Inc. (aluminum recycling facilities), and United Concrete. To the south of the site, across Rayo Avenue, are empty warehouses and manufacturing buildings, formerly occupied by Purex Corporation. Commercial businesses line the opposite side of Firestone Boulevard, north of the site. (3)

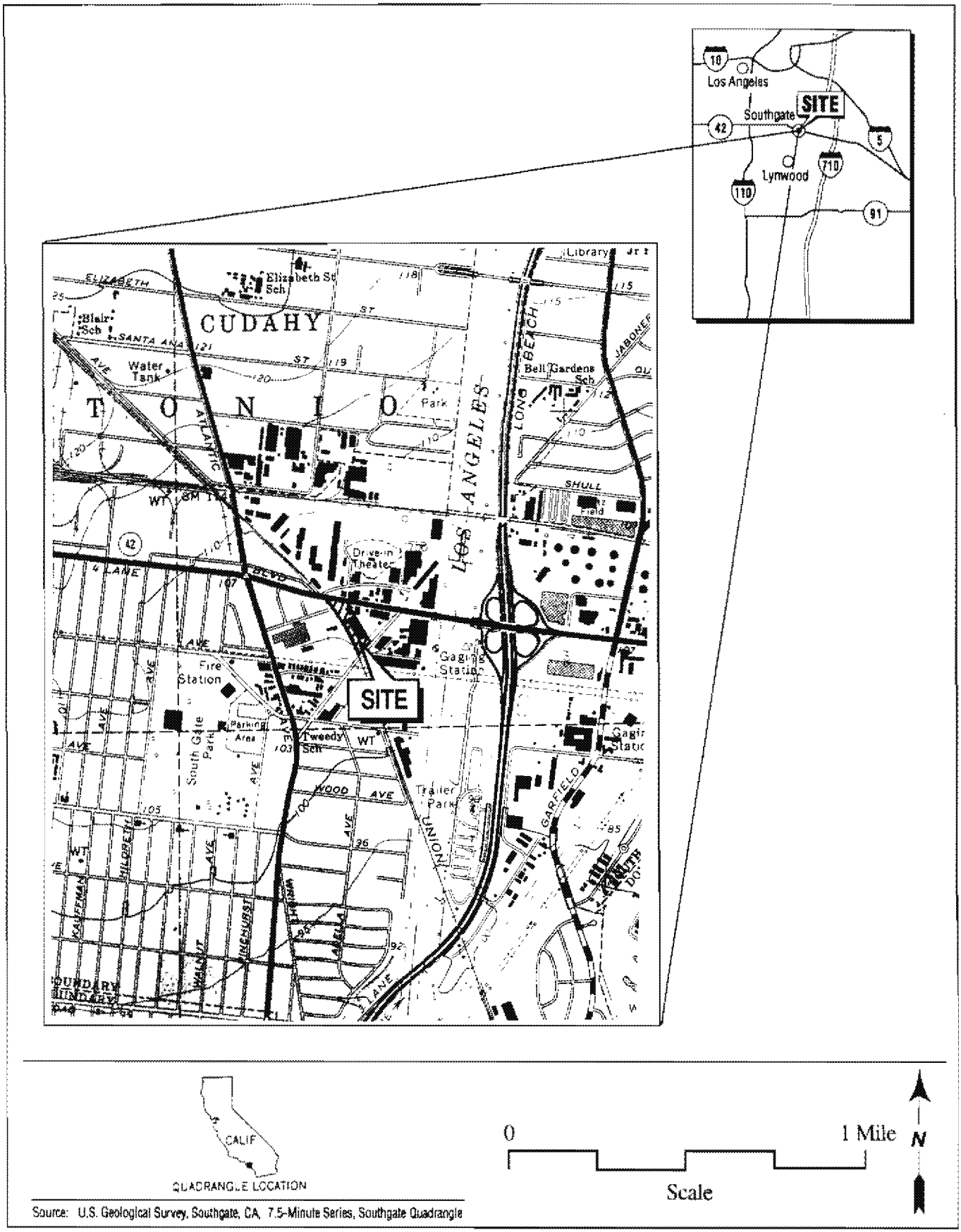
The site consists of a paved parking lot, two buildings, paved equipment storage areas, and landscaping. The two buildings currently on site are a manufacturing building at 9301 Rayo Ave. and an adjacent equipment storage and testing building at 5030 Firestone Blvd. The manufacturing building contains a paint spray booth, a waste-oil storage area, and a temporary waste-paint storage area. A covered high-bay area used for storing raw steel is attached to the manufacturing building. A short spur of the Union Pacific railroad track enters the northeast side of the site and ends under the high-bay area. Unused paint is stored in outdoor lockers along the northeast side of the manufacturing building. The equipment storage and testing building has a covered hazardous substance storage area attachment on its southeast corner. The site is entirely covered by asphalt pavement and buildings, except for landscaped areas in the parking lot and a grassy area north of the equipment storage building. The site buildings and paved storage areas are fenced. The site layout is shown in Figure 2-2. (3)

2.3 Operational History

The site was undeveloped agricultural land before 1950. Jervis built the manufacturing building at 9030 Rayo Ave. in 1950, and began operating a custom conveyer and crane manufacturing facility. In the 1960s, Jervis built the adjacent building at 5030 Firestone Blvd. The building was occupied by the Blake Rivet Co. until approximately 1984, when Jervis began using the building for equipment storage and testing. The property is owned by the Jervis B. Webb Company of Farmington, Michigan. (3)

During the first 20 years of operation, cranes and conveyers were manufactured at the site. In the 1970s, crane manufacturing at the site was discontinued. Currently, only conveyers and a few other specialty metal products are manufactured at the site. The manufacturing process consists of cutting, drilling, assembling, welding, and painting the steel pieces that comprise the final products. (3)

From 1960 to 1984, Blake Rivet Co. operated a rivet stamping facility on site. The exact operations at the Blake Rivet Co. are unknown. However, it is known from records that chromium and arsenic wastes were generated on site by Blake Rivet Co. It is unknown if solvents were used. Records from the Blake Rivet Co. facility in Cerritos, Calif. indicated wastes generated were plating cyanide bath solutions from electroplating operations, cyanide plating bath residues,



Source: U.S. Geological Survey, Southgate, CA, 7.5-Minute Series, Southgate Quadrangle

Figure 2-1 Site Location

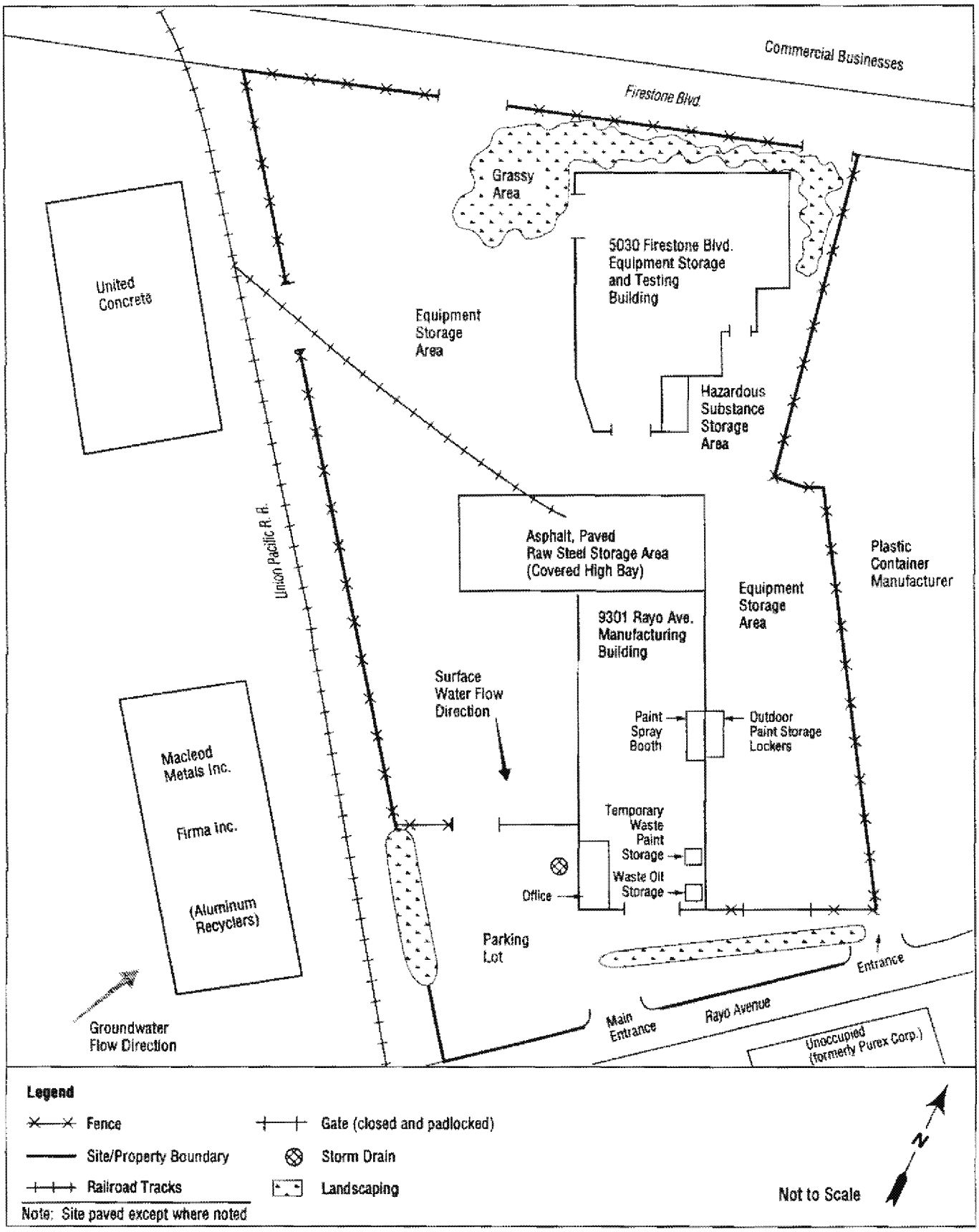


Figure 2-2 Site Layout

spent cyanide stripping and cleaning bath solutions from electroplating operations, and wastewater treatment cyanide sludges from metal heat treating operations. All contents of the building at the Jervis site were removed by Blake Rivet Co. in 1984, and the building is currently used as an equipment storage and testing building by Jervis. (6,7,8,9)

Hazardous substances used in the manufacturing process include solvents, paints, and petroleum-based lubricants. Prior to the mid-1980s, 1,1,1-trichloroethane was used as a solvent to clean fabricated metal pieces. The 1,1,1-trichloroethane was replaced in the mid-1980s with naphtha petroleum, a petroleum-based solvent. (3)

Prior to the mid-1980s, fabricated pieces were painted over an 8,000-gallon recycling water sump. Waste paint would periodically be cleaned out of the sump and transported off site for disposal. The amount of waste paint generated at the site prior to 1989 was not documented in available company records. The wet-painting operation was converted in the mid-1980s to a dry-painting booth. The concrete-lined sump was converted to hold paint filters and the filtered air was vented outside of the manufacturing building. According to a site representative, the sump was probably built when the building was constructed in 1950. Tap water was used in the sump process to separate the solids. No liquid from the sump was released into the sanitary sewer system. Approximately once a year, the contents of the sump were pumped and removed by a permitted waste hauler. The sump has been dry since approximately 1986 (6). In addition to modifying the painting operation, the oil-based paints used prior to the mid-1980s were replaced with water-based enamel paint. The oil-based paint contained toluene and xylene. (3) The water-base paint is applied in an onsite spray booth. Oil based thinner, brushes, and rags are used to clean the paint spray guns. Waste from this cleaning process is placed into 55-gallon drums, stored, and removed from the site by a permitted waste hauler. (6) According to a hazardous materials inventory list completed for the site in 1989, constituents in the water-based paints included lead chromate, butyl alcohol, and glycol ether (10). According to 1993 Material Safety Data Sheets (MSDS) at the site, barium compounds are a constituent of some paints currently used on site (11). All residue that falls onto the floor in the building is swept up and the material is placed in 55-gallon drums, stored, and removed from the site by a permitted waste hauler (6).

The hazardous substances currently generated at the site are used paint filters, a waste paint and water mixture, and petroleum-based waste lubricants and solvents (12). The waste products are stored in 55-gallon drums that are placed in sheet-metal trays in the hazardous substance storage area. The waste solvents and lubricants are transported off site by a licensed recycler. The waste paint filters and paint/water mixtures are transported off site for disposal. The quantity of waste paint generated at the site has decreased over the past several years because of decreasing conveyor production. In addition, offsite contractors now complete most of the painting work. (3)

2.4 Regulatory Involvement

2.4.1 U.S. Environmental Protection Agency (EPA). The Jervis site is listed in the Resource Conservation and Recovery Information System (RCRIS) database, as of April 15, 1994, as a large quantity hazardous waste generator. Blake Rivet Co. (CAD 980638274) is listed in the RCRIS database at 5030 Firestone Blvd., South Gate, Calif., as a large quantity generator. (13)

2.4.2 California Environmental Protection Agency. The Department of Toxic Substances Control (DTSC), Region 3, and the Regional Water Quality Control Board (RWQCB), Los

Angeles Region, do not have any file information on the Jervis and Blake Rivet Co. site (14,15, 16,17).

2.4.3 Los Angeles County Fire Department. The Los Angeles County Fire Department did not have a file on Jervis prior to 1989. Following a routine inspection conducted in July 1989 by the fire department, Jervis was required to submit a Hazardous Materials Business Plan and a Hazardous Material Inventory annually. The Hazardous Materials Business Plan describes emergency response plans and procedures, and employee training. (3,18)

2.4.4 South Coast Air Quality Management District. Jervis has a permit from the South Coast Air Quality Management District (Permit No. 156673) for the paint booth. No violations of the permit have been issued for the site. (3)

3.0 INVESTIGATIVE EFFORTS

No soil or groundwater samples have been collected at the Jervis site by either the site owners or regulatory agencies. (3)

4.0 HAZARD RANKING SYSTEM FACTORS

4.1 Sources of Contamination

Potential hazardous substance sources associated with the site include:

- A former 8,000-gallon paint and water sump used during the wet-painting process. The sump was converted to hold paint filters for a dry-painting booth in the mid-1980s (3).

- Hazardous waste manifests from 1990 through 1993 indicate that fifty 55-gallon drums containing waste paint, used paint filters, and paint rags were transported off site for disposal (19,20,21,22,23).

4.2 Groundwater Pathway

4.2.1 Hydrogeological Setting. The site is located in the Central Groundwater Basin in an area identified as the Central Basin Pressure Area. With the exception of the uppermost aquifer, known as the Semiperched Aquifer, groundwater in the Central Basin Pressure Area is generally confined. In most parts of the Central Basin Pressure Area, confined aquifers are separated by fine-grained aquicludes. These aquicludes are of varying lateral extent and composition and are absent in some areas where aquifers merge. Aquifers in the Central Basin Pressure Area are divided into upper group aquifers and lower group aquifers. The upper group aquifers are within the Recent Alluvium and Lakewood formations and the lower group aquifers are within the San Pedro Formation. (4)

Hydrogeologically, a series of nine aquifers have been identified in the vicinity of the site. The Recent Alluvium is divided into the Semiperched Aquifer, the Bellflower Aquiclude, and the Gaspur Aquifer. From upper to lower units, the Lakewood Formation consists of the Exposition

Aquifer, an unnamed aquiclude, and the Gage Aquifer. The San Pedro Formation consists of five aquifers: the Jefferson, the Hollydale, the Lynwood, the Silverado, and the Sunnyside. Unnamed aquicludes separate the aquifers. It is not known if the Semiperched Aquifer, which occurs from the surface to up to 60 feet below ground surface (bgs), is present below the site. The first aquifer encountered at the site is the Exposition Aquifer. Composed of coarse gravel, coarse to fine sand, silt, and clay, the Exposition Aquifer occurs between 70 feet bgs and 125 feet bgs. In the vicinity of the site, the Exposition Aquifer ranges from 30 feet to 110 feet thick. The Gage Aquifer occurs between 180 feet bgs and 265 feet bgs in the vicinity of the thick site. The Hollydale Aquifer first occurs approximately 310 feet bgs and the Jefferson aquifer first occurs between approximately 390 feet bgs and 450 feet bgs in the vicinity of the site. The Lynwood Aquifer first occurs in the vicinity of the site between approximately 475 feet bgs and 525 feet bgs. The Silverado Aquifer occurs between 580 feet bgs and 600 feet bgs in the vicinity of the site. The Sunnyside Aquifer occurs approximately 1,060 feet bgs in the vicinity of the site. The Lynwood and Silverado aquifers are important sources of groundwater in the region. (4) Aquifer interconnection exists within 2 miles of the site because TCE and/or PCE have been detected in seven municipal drinking-water wells that are within 1 mile of the Jervis site. The municipal drinking-water wells are screened in various aquifers, including the Exposition, the Lynwood, and the Silverado aquifers. (4,5,24) Groundwater flow in the upper group aquifers is to the north-northwest (4). The net annual precipitation at the site is 4.8 inches (25).

4.2.2 Groundwater Targets. The following 12 drinking-water systems have groundwater wells within 4 miles of the Jervis B. Webb site:

The Walnut Park Mutual Water company has a blended drinking-water system that serves approximately 14,722 people. Four drinking-water wells supply water to the system. In 1992, groundwater supplied 100 percent of the water to the entire system from October through May, while from May through October, groundwater supplied approximately 60 percent of the water to the total system. Surface water from the Metropolitan Water District contributed the remaining 40 percent. Approximately 80 percent of the drinking water in the system is now supplied by imported surface water. (26,27)

The Maywood Mutual Water Company Number 1 has a blended drinking-water system that serves approximately 5,000 people. The system is composed of two active wells. The groundwater wells contribute approximately 67 percent of the water to the entire system and the remaining 33 percent is from surface water imported from the Metropolitan Water District. (28)

The Maywood Mutual Water Company Number 2 has a blended drinking-water system that serves a population of approximately 6,600. Two active wells contribute approximately 50 percent of the water to the entire system, with the remainder supplied by surface water from the Metropolitan Water District. (29,30)

The Maywood Mutual Water Company Number 3 has a drinking-water system that serves a population of 10,000. Three active wells contribute 100 percent of the water to the total system. (31,32)

The City of South Gate has a drinking-water system that serves a population of approximately 75,000 people. Seven active drinking-water wells contribute 100 percent of the water to the total system. (33)

The City of Downey has a blended drinking-water system that serves a population of approximately 63,710 people. Twenty-one active wells supply approximately 95 percent of the water to the total system and the remaining 5 percent is from surface water. (34)

The City of Vernon has a drinking-water system that serves approximately 47,000 people. Eight active wells contribute 100 percent of the water to the entire system. (35,36)

The City of Huntington Park has a drinking-water system that serves approximately 52,000 people. The system is composed of six active wells that contribute 100 percent of the water to the total system. (37,38)

The Tract 180 Water Company has a drinking-water system composed of two active wells that serve approximately 14,000 people. Groundwater comprises 100 percent of the water for the system. (39,40)

The Tract 349 Mutual Water Company has a drinking-water system that serves approximately 6,500 people. Groundwater comprises 100 percent of the water for the system, which is supplied equally by two active wells. (41,42)

The Southern California Water Company has two systems within 4 miles of the Jervis site: the Florence-Graham system and the Bell/Bell Gardens system. The Florence-Graham system serves a population of 30,815 people. Seven active wells each contribute approximately 41 percent of the water to the total system, and the remaining 59 percent is from surface water sources. The Bell/Bell Gardens system serves a population of 23,209. The system is composed of 10 active groundwater wells that each contribute 35 percent of the water to the total system. The remaining 65 percent is from surface water sources. (43)

The City of Lynwood municipal water system has seven active wells in a blended system that serves 61,950 people. The seven wells each contribute 75 percent of the water to the total system and the remaining 25 percent is from surface water sources. (44)

4.2.3 Groundwater Pathway Conclusion. The depth to the Exposition Aquifer below the site is approximately 70 feet bgs to 125 feet bgs. The Exposition Aquifer is composed of sands, gravels, silts, and clays. Aquifer interconnection exists within 2 miles of the site because TCE and/or PCE have been detected in seven municipal drinking-water wells within 1 mile of the Jervis site. Fifty-seven drinking-water wells are within 4 miles of the site and contribute to 12 drinking-water systems that serve approximately 410,506 people.

4.3 Surface Water Pathway

The nearest surface water body is the concrete-lined Los Angeles River, approximately 0.25 mile east of the site. Surface water runoff from the site flows to the southeast into a storm drain, which discharges into the Los Angeles River. (3) No drinking-water intakes, fisheries, or sensitive environments are associated with the Los Angeles River (45,46,47).

4.4 Soil Exposure and Air Pathway

No residences, schools, or daycare centers are on the same property and within 200 feet of any hazardous substance sources associated with the site. In addition, the site buildings and paved hazardous substance storage areas are completely fenced. The site soils are almost completely covered by buildings or pavement. (3)

5.0 EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415 (b) (2)] authorizes the EPA to consider emergency response actions at sites that pose an imminent threat to human health or the environment. For the following reasons, a referral to Region IX's Emergency Response Section does not appear to be necessary:

- The site is an operating facility with an Hazardous Materials Business Plan that describes emergency planning and procedures in case of spills.
- There have been no documented spills or releases of hazardous substances at the site.

6.0 SUMMARY

The Jervis B. Webb Co. site is located at 9301 Rayo Ave. and 5030 Firestone Blvd., both in South Gate, Calif. The site, which occupies approximately 2.5 acres in an industrial area, consists of a paved parking lot, two buildings, paved equipment storage areas, and landscaping. The two buildings currently on site are a manufacturing building at 9301 Rayo Ave., and an adjacent equipment storage and testing building at 5030 Firestone Blvd. The manufacturing building contains a paint spray booth, waste oil storage area, and a temporary waste-paint storage area. The equipment storage and testing building has a covered hazardous substance storage area attachment on its southeast corner. The site is entirely covered by asphalt pavement and buildings, except for landscaped areas in the parking lot and a grassy area north of the equipment storage building. The site buildings and paved storage areas are fenced.

The Jervis B. Webb Co. built the manufacturing building at 9030 Rayo Ave. in 1950, and began operating a custom conveyer and crane manufacturing facility. In the 1960s, the Jervis B. Webb Co. built the adjacent building at 5030 Firestone Blvd. The building was occupied by the Blake Rivet Co., which stamped rivets, until 1984, when the Jervis B. Webb Co. began using the building for equipment storage and testing. Currently, only conveyers and a few other specialty metal products are manufactured at the site. The manufacturing process consists of cutting, drilling, assembling, welding, and painting the raw steel pieces that comprise the final product.

Hazardous substances used in the manufacturing process include solvents, paints, and petroleum-based lubricants. Prior to the mid-1980s, 1,1,1-trichloroethane was used as a solvent to clean fabricated metal pieces. The 1,1,1-trichloroethane was replaced in the mid-1980s with naptha petroleum, a petroleum-based solvent. Prior to the mid-1980s, fabricated pieces were painted over an 8,000-gallon recycling water sump. Waste paint would periodically be cleaned out of the sump and transported off site for disposal. The wet-painting operation was converted to a dry-painting booth in the mid-1980s. In addition to modifying the painting operation, the oil-based paints used

prior to the mid-1980s were replaced with a water-based enamel paint. The oil-based paint is known to have contained toluene and xylene. According to a 1989 Hazardous Waste Inventory List and a 1993 Material Safety Data Sheets (MSDS), constituents of water-based paints have included, or include lead chromate, barium compounds, butyl alcohol, and glycol ether. The hazardous substances currently generated at the site included used paint filters, a waste paint and water mixture, and petroleum-based waste lubricants and solvents. The waste products are stored in 55-gallon drums that are placed in sheet-metal trays. The waste solvents and lubricants are transported off site by a licensed recycler. The waste paint filters and paint/water mixtures are transported off site for disposal.

The Department of Toxic Substances Control (DTSC), Region 3, and the Regional Water Quality Control Board (RWQCB), Los Angeles Region, do not have any file information on the Jervis B. Webb Co. and Blake Rivet Co. site. The Jervis B. Webb Co. is required to annually submit a Hazardous Materials Business Plan and a Hazardous Material Inventory to the Los Angeles County Fire Department. The Jervis B. Webb Co. has a permit from the South Coast Air Quality Management District (Permit No. 156673) for the paint booth. No violations of the permit have been issued for the site. No groundwater or soil samples have been collected at the site, either by regulatory agencies or the site owners.

The depth to the Exposition Aquifer below the site is approximately 70 feet bgs to 125 feet bgs. The Exposition Aquifer is composed of sands, gravels, silts, and clays. Aquifer interconnection exists within 2 miles of the site because TCE and PCE have been detected in seven municipal drinking-water wells within 1 mile of the Jervis B. Webb Co. site. The nearest surface water body is the concrete-lined Los Angeles River, approximately 0.25 mile east of the site. Surface water runoff from the site flows to the southeast into a storm drain, which discharges into the Los Angeles River. No drinking-water intakes or fisheries are associated with the Los Angeles River. No residences, schools, or daycare centers are on the same property and within 200 feet of any hazardous substance sources associated with the site.

The following pertinent Hazard Ranking System factors are associated with the site:

- The Jervis B. Webb Co. has operated a conveyer manufacturing shop at the site since the 1950s. Undocumented quantities of oil-based paint wastes containing toluene and xylene were generated on site in a former 8,000-gallon water and paint sump.

- A waste paint and water mixture is generated at the site. Records from the site indicated that paints used by the Jervis B. Webb Co. have contained lead chromate and barium compounds.

- Fifty-seven drinking-water wells are within 4 miles of the site and contribute to 12 drinking-water systems that serve approximately 410,506 people.

APPENDIX A

REFERENCE LIST

Site: Jervis B. Webb Co.

1. U.S. Environmental Protection Agency, Comprehensive Environmental Response, Compensation, and Liability Information System, (CERCLIS), November 3, 1993.

2. Hodge, I-Pei Hsiu, Bechtel Environmental, Inc., Preliminary Consultation Memorandum and Scoresheets, Jervis B. Webb Co., June 9, 1994.

3. Hodge, I-Pei Hsiu, Bechtel Environmental, Inc., Site Reconnaissance Interview and Observations Report, May 25, 1994.

4. Heyler, Frederick, Bechtel Environmental, Inc., Letter (with attachments) to Lisa Nelson, U.S. Environmental Protection Agency, Region IX, South Gate Site Discovery Process, December 16, 1993.

5. U.S. Geological Survey, South Gate Quadrangle, California, 7.5-Minute Series (topographic), Photorevised 1981, Edited 1981.

6. Lynn, Richard, Jervis B. Webb Company of California, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., September 26, 1994.

7. U.S. Environmental Protection Agency, Notification of Hazardous Waste Activity, Blake Rivet Company, December 4, 1980.

8. U.S. Environmental Protection Agency, Notification of Hazardous Waste Activity, Blake Rivet Company, January 29, 1982.

9. U.S. Environmental Protection Agency, Notification of Hazardous Waste Activity, Blake Rivet Company, May 13, 1986.

10. Los Angeles County Fire Department Hazardous Materials Inventory for Jervis B. Webb Co., Reporting Period January 1 to December 31, 1989.

11. Lynn, Richard A., Jervis B. Webb Co., Letter (with attachments) to I-Pei Hsiu Hodge, Bechtel Environmental, Inc., July 13, 1994.

12. Los Angeles County Fire Department, Hazardous Materials Inventory for Jervis B. Webb Co., Reporting Period January 1, 1993 to December 31, 1993.

13. U.S. Environmental Protection Agency, Resource Conservation and Recovery Act (RCRA) Notifiers List, Region IX Database, April 15, 1994.

REFERENCE LIST (Cont'd)

Site: Jervis B. Webb Co.

14. Everly, Betty, California Environmental Protection Agency, Department of Toxic Substances Control, Discussion recorded on Contact Log, May 2, 1994.

15. Hernandez, Joe, California Environmental Protection Agency, Regional Water Quality Control Board, Discussion recorded on Contact Log, May 24, 1994.

16. Alley, Brenda, Cal-EPA, Department of Toxic Substances Control, Discussion recorded on Contact Log, September 26, 1994.

17. Au, Jenny, Cal-EPA, Regional Water Quality Control Board, Discussion recorded on Contact Log, September 26, 1994.

18. Los Angeles County Fire Department, Inspection Data Report, Jervis B. Webb Co., July 11, 1989.

19. California Department of Health Services, Uniform Hazardous Waste Manifest No. 89938490 (with Purchase Order), Jervis B. Webb Co., June 13, 1991.

20. California Department of Health Services, Uniform Hazardous Waste Manifest No. 89938543 (with Purchase Order), Jervis B. Webb Co., November 14, 1991.

21. California Department of Health Services, Uniform Hazardous Waste Manifest No. 89938412 (with Purchase Order), Jervis B. Webb Co., February 13, 1991.

22. California Department of Health Services, Uniform Hazardous Waste Manifest No. 89938213 (with Purchase Order), Jervis B. Webb Co., September 20, 1990.

23. California Department of Health Services, Uniform Hazardous Waste Manifest No. 88696862 (with Purchase Order), Jervis B. Webb Co., February 16, 1990.

24. West Basin Municipal Water District and Central Basin Municipal Water District, Cooperative Basin-Wide Title 22 Groundwater Monitoring Program, 1992 Annual Water Quality Report, June 1993.

25. Platt, Andrew M., MITRE Corporation, Letter to Lucy Sibold, U.S. Environmental Protection Agency, May 26, 1988.

26. Borden, Janet, Walnut Park Mutual Water Company, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 18, 1994.

27. Borden, Janet, Walnut Park Mutual Water Company, Telephone conversation recorded on Contact Report by Deborah Tharp, Bechtel Environmental, Inc., October 29, 1992.

REFERENCE LIST (Cont'd)

Site: Jervis B. Webb Co.

28. Jewett, Monte, Maywood Mutual Water Company No. 1, Telephone conversation recorded on Contact Report by Maynard Geisler, Bechtel Environmental, Inc., April 20, 1994.

29. Rickabaugh, Warren, Maywood Mutual Water Company 2, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 18, 1994.

30. Rickabaugh, Warren, Maywood Mutual Water Company 2, Telephone conversation recorded on Contact Report by Gary Yao, Bechtel Environmental, Inc., September 24, 1992.

31. Fick, Ronald, Maywood Mutual Water Company 3, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 14, 1994.

32. Fick, Ronald, Maywood Mutual Water Company 3, Telephone conversation recorded on Contact Report by Gary Yao, Bechtel Environmental, Inc., September 24, 1992.

33. Chambers, John, City of South Gate, Telephone conversation recorded on Contact Report by Maynard Geisler, Bechtel Environmental, Inc., May 3, 1994.

34. Vasquez, Tony, City of Downey, Telephone conversation recorded on Contact Report by Maynard Geisler, Bechtel Environmental, Inc., April 20, 1994.

35. Yasutake, Adrian, City of Vernon, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 14, 1994.

36. Yasutake, Adrian, City of Vernon, Telephone conversation recorded on Contact Report by Gary Yao, Bechtel Environmental, Inc., September 23, 1992.

37. Armijo, Bency, City of Huntington Park, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 25 1994.

38. Armijo, Bency, City of Huntington Park, Telephone conversation recorded on Contact Report by Gary Yao, Bechtel Environmental, Inc., September 24, 1992.

39. Long, Randy, Tract 180 Water Company, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 18 1994.

40. Long, Randy, Tract 180 Water Company, Telephone conversation recorded on Contact Report by Deborah Tharp, Bechtel Environmental, Inc., October 29, 1994.

41. Provencal, Erwina, Tract 349 Mutual Water Company, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 15 1994.

REFERENCE LIST (Cont'd)

Site: Jervis B. Webb Co.

42. Provencal, Erwina, Tract 349 Mutual Water Company, Telephone conversation recorded on Contact Report by Deborah Tharp, Bechtel Environmental, Inc., October 29, 1992.

43. Goclowski, Clara Patricia, Southern California Water Company, Letter to Heather L. McAdams, Bechtel Environmental, Inc., May 13, 1994.

44. Nguyen, Van, City of Lynwood Department of Water, Telephone conversation recorded on Contact Report by Gary Yao, Bechtel Environmental, Inc., October 6, 1992.

45. Montano, Art, Los Angeles Health Department, Telephone conversation recorded on Contact Report by Deborah Tharp, Bechtel Environmental, Inc., December 2, 1992.

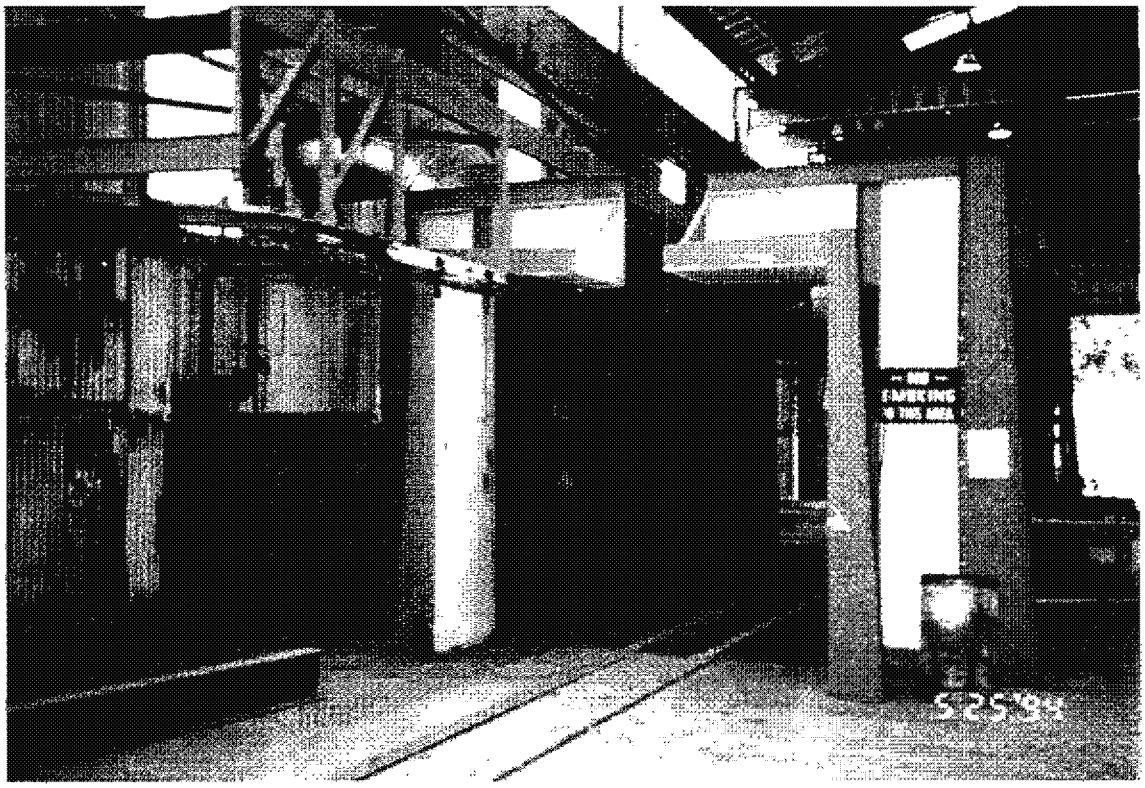
46. Maxwell, Dwayne, C., California State Department of Fish and Game, Telephone conversation recorded on Contact Report by Deborah Tharp, December 2, 1992.

47. California Department of Fish and Game, Natural Diversity Database, 1991.

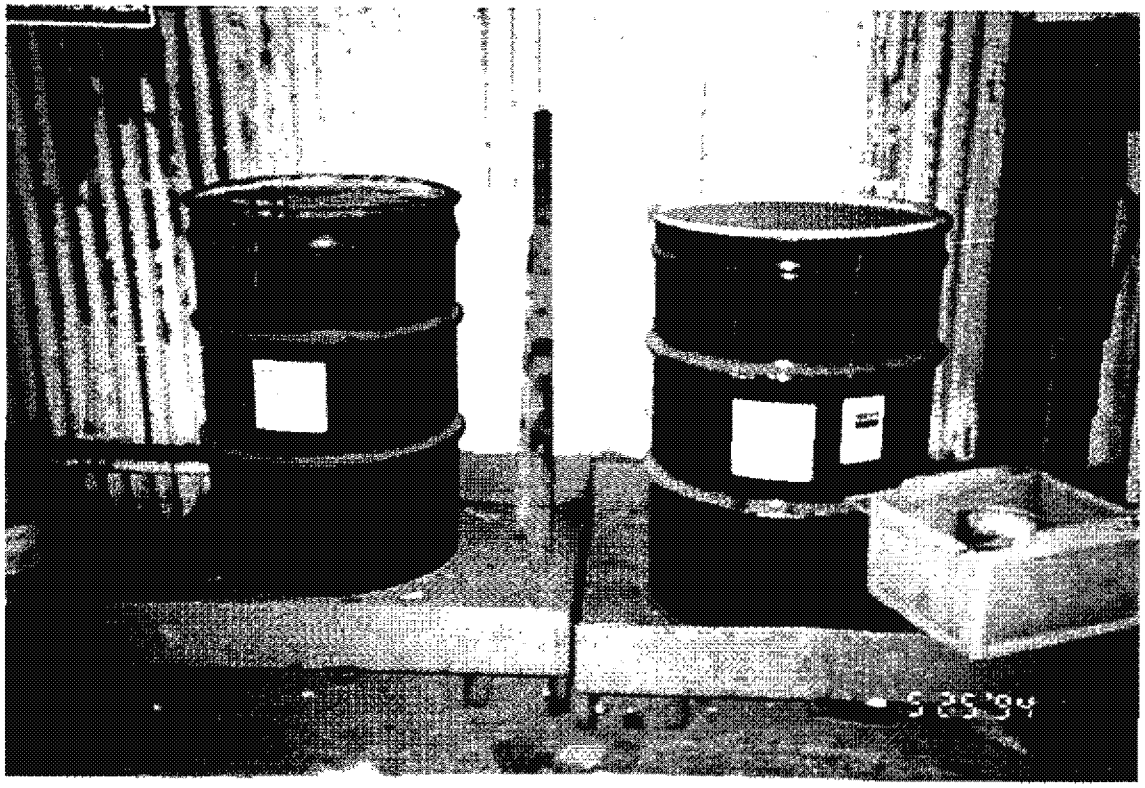
APPENDIX B
Photographic Documentation

1. Main manufacturing building at 9301 Rayo Ave. (facing north).

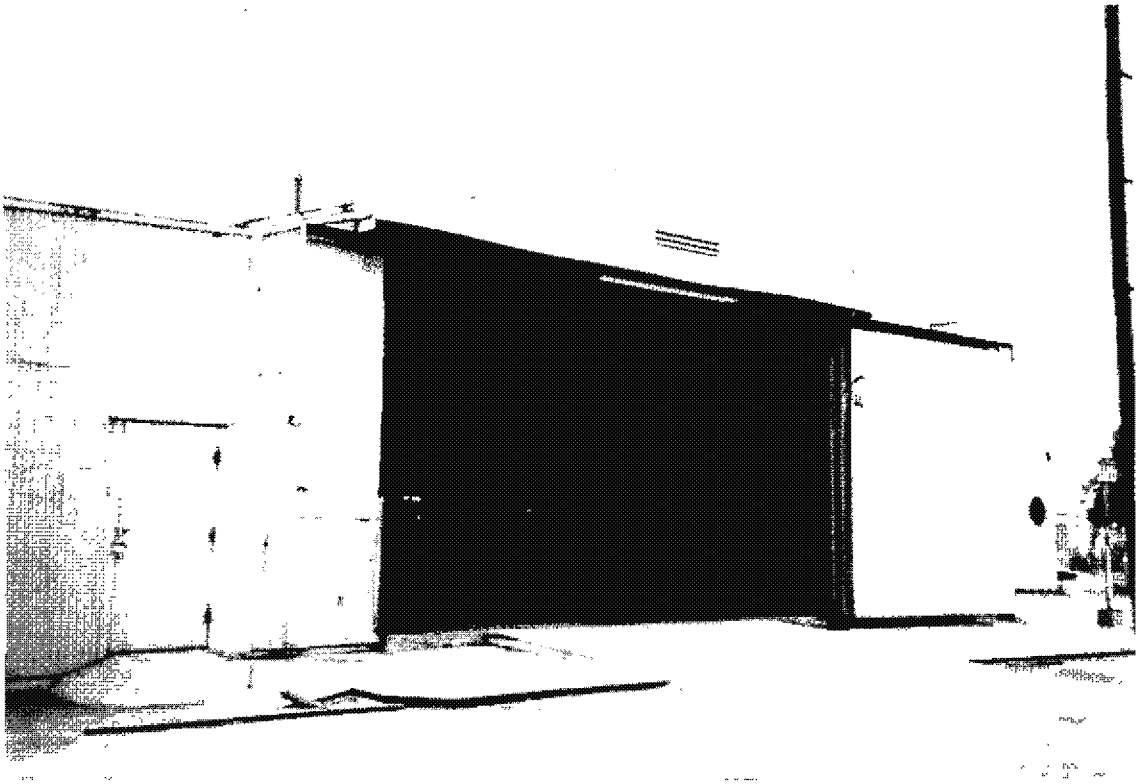
2. Asphalt-paved equipment storage area along east side of 9301 Rayo Ave. building. Virgin paint storage lockers are next to the building (facing northwest).



3. Paint spray booth within the 9301 Rayo Ave. building (facing southeast)



4. Temporary waste paint storage area within the 9301 Rayo Ave. building (facing northeast).



5. Equipment storage and testing building at 5030 Firestone Blvd. (facing north).

6. Asphalt paved equipment storage area along west side of the 5030 Firestone Blvd. building (facing northwest).

7. Covered hazardous substance storage area attached to the 5030 Firestone Blvd. building (facing north).

APPENDIX C

CONTACT LOG

Site: **Jervis B. Webb Co.**

EPA ID: **CAD 008339467**

Name	Affiliation	Phone	Date	Information
Van Nguyen	City of Lynwood Department of Water	(310) 603-0220	10/6/92	See Contact Report by Gary Yao, Bechtel Environmental, Inc. (BEI)
Art Montano	Los Angeles Health Department	(213) 620-2980	12/2/92	See Contact Report by Deborah Tharp, BEI.
Dwayne C. Maxwell	California State Department of Fish and Game	(310) 590-5137	12/2/92	See Contact Report by Deborah Tharp, BEI.
Adrian Yasutake	City of Vernon Water Department	(213) 583-8811	4/14/94	See Contact Report by Virginia Demetrios, BEI.
Ronald Fick	Maywood Mutual Water Company 3	(213) 771-5985	4/14/94	See Contact Report by Virginia Demetrios, BEI.
Erwina Provencal	Tract 349 Mutual Water Company	(213) 560-1601	4/15/94	See Contact Report by Virginia Demetrios, BEI.
Warren Rickabaugh	Maywood Mutual Water Company 2	(213) 581-5816	4/18/94	See Contact Report by Virginia Demetrios, BEI.
Randy Long	Tract 180 Water Company	(213) 771-6682	4/18/94	See Contact Report by Virginia Demetrios, BEI.
Janet Borden	Walnut Park Mutual Water Company	(213) 585-7321	4/18/94	See Contact Report by Virginia Demetrios, BEI.
Monte Jewett	Maywood Mutual Water Company 1	(213) 560-2439	4/20/94	See Contact Report by Maynard Geisler, BEI.
Tony Vasquez	City of Downey Water Division	(310) 904-7202	4/20/94	See Contact Report by Maynard Geisler, BEI.
Bency Armijo	City of Huntington Park Department of Public Works	(213) 587-5969	4/25/94	See Contact Report by Virginia Demetrios, BEI.

CONTACT LOG (Cont'd)

Site: Jervis B. Webb Co.

Name	Affiliation	Phone	Date	Information
Betty Everly	Cal-EPA, Department of Toxic Substances Control	(818) 551-2886	4/28/94	No information on Jervis B. Webb was in the DTSC database. She will check the actual files and call me back.
Librarian at Social Sciences Desk	L.A. City Public Library	(213) 228-7300	4/28/94	According to the 1990 Census of Population and Housing, Summary Population and Housing Characteristics, CA: the total population in Downey is 91,444 and there are 33,013 households.
Jim Enriquez	L.A. County Fire Prevention Department	(213) 890-4137	4/29/94	Referred me to Fire Station No. 54 on Rayo Ave at (213) 567-8580 for fire inspection reports, and Hazardous Material Disclosure Unit at (213) 890-4000 for MSDS sheets. As South Gate inspector, he only inspects large companies.
Gary Harris	Fire Station No. 54	(213) 567-8580	4/29/94	The file on Jervis B. Webb contains the annual fire inspection report, the hazardous materials inventory, and site map. The company manufactures conveyors and other steel work. Hazardous substances include butyl alcohol, glycol ether, acetylene, dies, mineral spirits. He will have someone call me back about accessing the files.
Mr. Brumen	Hazardous Materials Disclosure Unit	(213) 890-4000	4/29/94	Referred me to Public Health Investigations Office at (213) 725-5191.

CONTACT LOG (Cont'd)

Site: Jervis B. Webb Co.

Name	Affiliation	Phone	Date	Information
Tracy Ho	Public Health Investigations	(213) 725-5191	4/29/94	To access Haz Mat file info: Need to mail $16 check per site payable to DHS. Include site address and zip code. Mail request to PHI 5557 Ferguson Dr., Suite 321, Commerce, CA 90022. They will send us any info. in HazMat file <50 pages. Will charge $0.10/page over 50 pages. Info in files includes tax payment, fire inspections and MSDS (possibly).
Betty Everly	Cal-EPA, Department of Toxic Substances Control, Region 3	(818) 551-2886	5/2/94	She found no information on the Jervis B. Webb site in the DTSC files.
Joe Hernandez	Cal-EPA, Regional Water Quality Control Board, Los Angeles Region	(213) 266-7579	5/2/94	Left message.
Captain Hernandez	Fire Station No. 54	(213) 567-8580	5/2/94	Contact Barbara Yu at (213) 890-4038 about getting file information. She is with the Hazardous Materials Disclosure Unit.
Barbara Yu	L.A. County Fire Dept., Hazardous Materials Section, RMPP Unit	(213) 890-4038	5/2/94	Fax the following on letterhead to Fax No. (213) 890-4051: Address of site, reason information is needed, company name, documentation that I am under contract with the U.S. EPA. Also mail letter to 5825 Rickenbacker Rd., Commerce, CA 90040.

CONTACT LOG (Cont'd)

Site: Jervis B. Webb Co.

Name	Affiliation	Phone	Date	Information
Richard Lynn	Jervis B. Webb Co.	(213) 588-8271	5/2/94	He is the purchasing agent. Scheduled site visit for May 25, 1994 at 1:30 p.m. The shop has operated since the 1950s. Minimal wastes are generated on site, mainly water-based waste paint and petroleum-based solvent, both of which are sent for offsite recycling. He estimates that about 9 gals of waste substances were recycled last year. Hazardous substances include propane, acetylene, oxygen hydraulic fluid, paint, and solvent. Mail letter to the company office at P.O. Box 58885, Los Angeles, CA 90058. The shop is located at 9301 Rayo Ave.
John Chambers	City of South Gate Public Works Department	(213) 563-5790	5/3/94	See Contact Report by Maynard Geisler, BEI.
Betty Everly	DTSC	(818) 551-2886	5/22/94	No file info. on 5030 Firestone Blvd. or Blake Rivet Co.
Joe Hernandez	RWQCB	(213) 266-7579	5/24/94	They do not have a file on Jervis B. Webb.
Richard Lynn	Jervis B. Webb	(213) 588-8271	9/26/94	See Contact Report.
Brenda Alley	DTSC	(818) 551-2886	9/26/94	No file.
Jenny Au	RWQCB	(213) 266-7500	9/26/94	No file.
Receptionist	Property Management Associates, Inc.	(310) 247-0898	9/27/94	This office is located on Wilshire Blvd. No Thomas Spear has or is working for this company. They are unaware of an office on La Cienega Blvd.

APPENDIX D

CONTACT REPORT

AGENCY/AFFILIATION: City of Lynwood, Department of Water		
DEPARTMENT:		
ADDRESS: 11330 Bullis Road	CITY: Lynwood	
COUNTY: Los Angeles	STATE: CA	ZIP: 90262
CONTACT(S)	TITLE	PHONE
Mr. Van Nguyen	Civil Engineering Assistant	310-603-0220
BEI PERSON MAKING CONTACT: Gary Yao G.Y.		DATE: 10/06/92
SUBJECT: Information on the City of Lynwood municipal water system		
SITE NAME: Indian Wells Estates, Inc.	EPA ID: CAD 008375776	

DISCUSSION:

Mr. Nguyen informed me that the City of Lynwood municipal water system obtains 75 percent of its water from seven active groundwater wells. The Metropolitan Water District supplies the other 25 percent. The wells are located at the following locations:

Well 5	Northwest corner of Elm Street and Walnut Avenue ✓
Well 6	11337 Esther Street
Well 8	11331 Bullis Road ✓
Well 9	Northwest corner of Bradfield Avenue and Carlin Avenue
Well 11	11645 Esther Street
Well 15	5212 Imperial Highway ✓
Well 19	2600 Industry Way
Well 20	11720 Thorson Avenue ~~(STANDBY WELL)~~ STAND-BY WELL

These wells have intermittent perforations from 500 feet to 900 feet below ground surface. Currently, well 20 is a standby well in this system ~~There are currently no standby wells in this blended system.~~ According to Mr. Nguyen, all wells are tested for hazardous substances. Wells 5 and 15 are contaminated with perchloroethylene (PCE), but the concentrations are below the Maximum Contaminant Level (MCL). According to Mr. Nguyen, the PCE contamination is originating from the northeast, probably from the City of Downey. Well 20 shows levels of iron and manganese that are above the MCLs. Approximately 61,950 people are being served by the City of Lynwood municipal water system.

CONTACT CONCURRENCE: Van Nguyen DATE: 10/25/92

CONTACT REPORT

AGENCY/AFFILIATION: Los Angeles Health Department		
DEPARTMENT: Office of Drinking Water		
ADDRESS: 1449 West Temple Street	CITY: Los Angeles	
COUNTY: Los Angeles	STATE: CA	ZIP: 90026
CONTACT(S)	TITLE	PHONE
Art Montano	Sanitary Engineer	(213) 620-2980
BEI PERSON MAKING CONTACT: Deborah Tharp DT SM		DATE: 12/2/92
SUBJECT: Surface Water Intakes		
SITE NAME: Tulip Corporation	EPA ID: CAD 075267880	

DISCUSSION:

There are no drinking water intakes from surface water associated with the Los Angeles River.

CONTACT CONCURRENCE: _____ DATE: _____

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CONTACT REPORT

AGENCY/AFFILIATION: State of California		
DEPARTMENT: Department of Fish and Game		
ADDRESS: 330 Goldenshore Ave., Ste. 50	CITY: Long Beach	
COUNTY: Los Angeles	STATE: CA	ZIP: 90802
CONTACT(S)	TITLE	PHONE
Dwayne C. Maxwell		(310) 590-5137
BEI PERSON MAKING CONTACT: Deborah Tharp DT DM		DATE: 12/2/92
SUBJECT: Surface Water Intakes		
SITE NAME: Tulip Corporation	EPA ID: CAD 075267880	

DISCUSSION:

There are no commercial fisheries associated with the Los Angeles River.

CONTACT CONCURRENCE: Dwayne C. Maxwell DATE: 12/8/92

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CONTACT REPORT

AGENCY/AFFILIATION: City of Vernon		CODE: gw
DEPARTMENT: Water Department		
ADDRESS: 4305 Santa Fe Avenue	CITY: Vernon	
COUNTY: Los Angeles	STATE: CA	ZIP: 90058
CONTACT(S) Adrian Yasutake	TITLE	PHONE (213) 583-8811
BEI PERSON MAKING CONTACT: Virginia Demetrios		DATE: 4/14/94
SUBJECT: Information on the City of Vernon municipal water system		
SITE NAME: Harshaw/Filtrol (Bandini Blvd Facility)	EPA ID: CAD 980884332	

DISCUSSION:

As we discussed during our telephone conversation, the information included in the attached contact report dated September 23, 1992 concerning the City of Vernon's municipal water system is still accurate.

CONTACT CONCURRENCE: _____ **DATE:** _____

~~332 00003~~
~~332 00009~~
ATTACHMENT FOR:
A163 0004

CONTACT REPORT

AGENCY/AFFILIATION: City of Vernon, Water Department		
DEPARTMENT:		
ADDRESS: 4305 Santa Fe Avenue	CITY: Vernon	
COUNTY: Los Angeles	STATE: CA	ZIP: 90058
CONTACT(S)	TITLE	PHONE
Mr. Adrian Yasutake		213-583-8811
BEI PERSON MAKING CONTACT: Gary Yao G.Y. GM		DATE: 9/23/92
SUBJECT: Information on the City of Vernon municipal water system		
SITE NAME: Indian Wells Estates, Inc.	EPA ID: CAD 008375776	

DISCUSSION:

Mr. Yasutake informed me that the City of Vernon obtains all of its drinking water from nine active groundwater wells. These wells are perforated approximately 500 feet below ground surface, and are located at the following locations:

Well 11	4305 Santa Fe Avenue
Well 12	4355 Downey Road
Well 14	2800 Soto Street
Well 15	3392 50th Street
Well 16	4305 Santa Fe Avenue
Well 17	4355 Downey Road
Well 18	2070 51st Street
Well 19	3336 50th Street
Well 20	4755 District Boulevard

According to Mr. Yasutake, the wells contribute equal amounts of water to the system. These wells are also analyzed for hazardous substances every 3 years, and no well has been closed due to contamination. There are no standby wells in the City of Vernon municipal water system.

Approximately 47,000 people are served by this blended municipal system. Two private water companies, California Water and Maywood Mutual #3, also supply drinking water for the City of Vernon.

CONTACT CONCURRENCE: [signature] DATE: 9-28-92

CONTACT REPORT

AGENCY/AFFILIATION: Maywood Mutual Water Company 3		CODE: gw
DEPARTMENT:		
ADDRESS: P.O. Box 669	CITY: Maywood	
COUNTY: Los Angeles	STATE: CA	ZIP: 90270
CONTACT(S) Ronald Fick	TITLE Field Superintendent	PHONE (213) 771-5985
BEI PERSON MAKING CONTACT: Virginia Demetrios		DATE: 4/14/94
SUBJECT: Information on the Maywood Mutual Water Company 3 municipal water system		
SITE NAME: Harshaw/Filtrol (Bandini Blvd Facility)	EPA ID: CAD 980884332	

DISCUSSION:

As we discussed during our telephone conversation, the information included in the attached contact report dated September 24, 1992 concerning the Maywood Mutual Water Company 3 municipal water system is still accurate. The company's name was misspelled in the original contact report as Maywood Municipal Water Company 3.

CONTACT CONCURRENCE: _____ **DATE:** _____

~~332 00006~~
~~332 00010~~
A163 0005

CONTACT REPORT

AGENCY/AFFILIATION: Maywood Municipal Water Company 3		
DEPARTMENT:		
ADDRESS: P.O. Box 669	CITY: Maywood	
COUNTY: Los Angeles	STATE: CA	ZIP: 90270
CONTACT(S)	TITLE	PHONE
Mr. Ronald Fick	Field Superintendent	213-771-5985
BEI PERSON MAKING CONTACT: Gary Yao G.Y. SM		DATE: 9/24/92
SUBJECT: Information on the Maywood Municipal Water Company 3		
SITE NAME: Indian Wells Estates, Inc.	EPA ID: CAD 008375776	

DISCUSSION:

Mr. Fick informed me that Maywood Municipal Water Company 1, Maywood Municipal Water Company 2, and Maywood Municipal Water Company 3 are all separate water companies. Maywood Municipal Water Company 3 serves the cities of Bell, Maywood, and Vernon. It has three active wells in its system. These wells are located at the following locations:

Well 1	Prospect Avenue and Filmore Street (City of Bell)
Well 3	Heliotrope Avenue and 52nd
Well 4	Randolph Street and District Boulevard

Well 1 contributes approximately 40 percent of the total water supplied by this blended system. According to Mr. Fick, the system serves approximately 10,000 people (2,000 connections X average of five people per connection). The wells are analyzed for hazardous substances by the Central Basin as required by the state. No well has ever been closed due to contamination of hazardous substances.

CONTACT CONCURRENCE: Ronald E. Fick DATE: 10-1-92

CONTACT REPORT

AGENCY/AFFILIATION: Tract 349 Mutual Water Company		CODE: gw
DEPARTMENT:		
ADDRESS: 4630 Santa Ana St.	CITY: Cudahay	
COUNTY: Los Angeles	STATE: CA	ZIP: 90201
CONTACT(S) Edwina Provencal	TITLE Executive Secretary	PHONE (213) 560-1601
BEI PERSON MAKING CONTACT: Virginia Demetrios		DATE: 4/15/94
SUBJECT: Information on the Tract 349 Mutual Water Company municipal water system		
SITE NAME: Harshaw/Filtrol (Bandini Blvd Facility)	EPA ID: CAD 980884332	

DISCUSSION:

As we discussed during our telephone conversation, the information included in the attached contact report dated October 29, 1992 concerning the Tract 349 Mutual Water Company municipal water system is still accurate.

CONTACT CONCURRENCE: _____ **DATE:** _____

CONTACT REPORT

AGENCY/AFFILIATION: Tract 349 Mutual Water Company		
DEPARTMENT:		
ADDRESS: 4630 Santa Ana St.	CITY: Cudahy	
COUNTY: Los Angeles	STATE: CA	ZIP: 90201
CONTACT(S)	TITLE	PHONE
Erwina Provencal	Executive Secretary	(213) 560-1601
BEI PERSON MAKING CONTACT: Deborah Tharp DT		DATE: 10/29/92
SUBJECT: Tract 349 Mutual Water Company Wells		
SITE NAME: Tulip Corporation	EPA ID: CAD 075267880	

DISCUSSION:

Tract 349 Mutual Water Company has two active groundwater wells in its system. One of these wells is located at 4630 Santa Ana Street in Cudahay, the other is located at 3726 Florence Avenue in Huntington Park. The two wells contribute equally to the water supply. Approximately 6,500 people are served by this system. Neither of these wells has ever been closed due to contamination from hazardous substances.

CONTACT CONCURRENCE: Erwina Provencal DATE: 11-2-92

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CONTACT REPORT

AGENCY/AFFILIATION: Maywood Mutual Water Company 2		CODE: GW
DEPARTMENT:		
ADDRESS: 3521 E. Slauson Avenue	CITY: Maywood	
COUNTY: Los Angeles	STATE: CA	ZIP: 90270
CONTACT(S) Warren Rickabaugh	TITLE Field Superintendent	PHONE (213) 581-5816
BEI PERSON MAKING CONTACT: Virginia Demetrios		DATE: 4/18/94
SUBJECT: Information on the Maywood Mutual Water Company 2 municipal water system		
SITE NAME: Harshaw/Filtrol (Bandini Blvd Facility)	EPA ID: CAD 980884332	

DISCUSSION:

As we discussed during our telephone conversation, the information included in the attached contact report dated September 24, 1992 concerning the Maywood Mutual Water Company 2 municipal water system is still accurate, except that the total number of people served by this system is 6,600. In addition, due to an upgrading of the system in 1993, the 52nd Street well has been able to generate 1,000 gallons per minute.

CONTACT CONCURRENCE: _____ **DATE:** _____

~~332 00008~~
~~332 00013~~
A163-0007

CONTACT REPORT

AGENCY/AFFILIATION: Maywood Mutual Water Company 2		
DEPARTMENT:		
ADDRESS: 3521 E. Slauson Avenue	CITY: Maywood	
COUNTY: Los Angeles	STATE: CA	ZIP: 90270
CONTACT(S)	TITLE	PHONE
Mr. Warren Rickabaugh	Field Superintendent	213-581-5816
BEI PERSON MAKING CONTACT: Gary Yao G.Y. GM		DATE: 9/24/92
SUBJECT: Information on the Maywood Mutual Water Company 2		
SITE NAME: Indian Wells Estates, Inc.	EPA ID: CAD 008375776	

DISCUSSION:

Mr. Rickabaugh informed me that Maywood Mutual Water Company 2 serves the City of Maywood and a small portion of Huntington Park. It has two active wells in its system. One well is located at 5207 Maywood Avenue and the other one is located at 4421 East 52nd Street. The Maywood Well is perforated intermittently between 528 and 1,276 feet below ground surface (bgs). This well can generate 1,300 gallons per minute. The 52nd Well is perforated intermittently between 473 and 1,094 feet bgs, and can generate approximately 700 gallons per minute. According to Mr. Rickabaugh, 50 percent of the drinking water in the system comes from the Metropolitan Water District.

The Maywood Mutual Water Company 2 groundwater wells are analyzed for hazardous substances, and no well has ever been closed due to contamination. Approximately 9,200 people are currently being served by this system.

MAYWOOD MUTUAL WATER CO. #2
3521 E. SLAUSON AVE.
MAYWOOD, CA 90270

CONTACT CONCURRENCE: Warren Rickabaugh DATE: 10-5-92

CONTACT REPORT

AGENCY/AFFILIATION: Tract 180 Water Company		CODE: gw
DEPARTMENT:		
ADDRESS: 4544 E. Florence Avenue	CITY: Cudahay	
COUNTY: Los Angeles	STATE: CA	ZIP: 90201
CONTACT(S) Randy Long	TITLE General Manager	PHONE (213) 771-6682
BEI PERSON MAKING CONTACT: Virginia Demetrios VD		DATE: 4/18/94
SUBJECT: Information on the Tract 180 Water Company municipal water system		
SITE NAME: Harshaw/Filtrol (Bandini Blvd Facility)	EPA ID: CAD 980884332	

DISCUSSION:

As we discussed during our telephone conversation, the information included in the attached contact report dated October 29, 1992 concerning the Tract 180 Water Company municipal water system is still accurate.

CONTACT CONCURRENCE: _____ **DATE:** _____

~~331 00003~~
~~331 00009~~
A163 0005

CONTACT REPORT

AGENCY/AFFILIATION: Tract 180 Water Company		
DEPARTMENT:		
ADDRESS: 4544 E. Florence Avenue	CITY: Cudahay	
COUNTY: Los Angeles	STATE: CA	ZIP: 90201
CONTACT(S)	TITLE	PHONE
Randy Long	General Manager	(213) 771-6682
BEI PERSON MAKING CONTACT: Deborah Tharp DT		DATE: 10/29/92
SUBJECT: Tract 180 Water Company Wells		
SITE NAME: Tulip Corporation	EPA ID: CAD 075267880	

DISCUSSION:

Tract 180 Water Company maintains two drinking water wells. The wells are located at 4544 and 4566 E. Florence Avenue in Cudahay. The water system distributes 100 percent groundwater with each well contributing equally. Tract 180 Water Company serves a population of 14,000 people. Both of the wells are tested regularly and neither well has ever been shut down due to contamination from hazardous substances. The wells are both drilled to an approximate depth of 1,300 feet.

CONTACT CONCURRENCE: Randall Long DATE: 11-6-92

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CONTACT REPORT

AGENCY/AFFILIATION: Walnut Park Mutual Water Company		CODE: GW
DEPARTMENT:		
ADDRESS: 2460 Florence Ave.	CITY: Huntington Park	
COUNTY: Los Angeles	STATE: CA	ZIP: 90255
CONTACT(S) Janet Borden	TITLE Office Manager	PHONE (213) 585-7321
BEI PERSON MAKING CONTACT: Virginia Demetrios		DATE: 4/18/94
SUBJECT: Information on the Walnut Park Mutual Water Company municipal water system		
SITE NAME: Harshaw/Filtrol (Bandini Blvd Facility)	EPA ID: CAD 980884332	

DISCUSSION:

As we discussed during our telephone conversation, the information included in the attached contact report dated October 29, 1992 concerning the Walnut Park Mutual Water Company municipal water system is still accurate, except that the percentage of groundwater and imported surface water supplied to the system has changed due to drought conditions and restrictions on groundwater use in the Los Angeles area. Since June 1, 1993, approximately 80 percent of the drinking water is supplied by imported surface water from the Metropolitan Water District.

CONTACT CONCURRENCE: _____ **DATE:** _____

~~331 00008~~

~~331 00008~~
A163 0008

CONTACT REPORT

AGENCY/AFFILIATION: Walnut Park Mutual Water Company		
DEPARTMENT:		
ADDRESS: 2460 Florence Ave.	CITY: Huntington Park	
COUNTY: Los Angeles	STATE: CA	ZIP: 90255
CONTACT(S)	TITLE	PHONE
Janet Borden	Office Manager	(213) 585-7321
BEI PERSON MAKING CONTACT: Deborah Tharp DT		DATE: 10/29/92
SUBJECT: Information on Walnut Park Mutual Water Company Groundwater Wells		
SITE NAME: Tulip Corporation	EPA ID: CAD 075267880	

DISCUSSION:

The Walnut Park Mutual Water Company serves the population of Walnut Park with drinking water from the company's four wells located at 2460 Florence Avenue in Huntington Park. The approximate population served by the well water is 14,722 according to 1990 census data. From May through October, the Walnut Park Mutual Water Company blends approximately 60 percent groundwater with 40 percent Metropolitan Water District Water. From October through May, the drinking water system is supplied by 100 percent groundwater. The company's four wells are drilled to the following depths: Well 8 is 1,200 feet deep; Well 9 is 1,050 feet deep; Well 10 is 1,616 feet deep; Well 11 is 1,520 feet deep. The newest of the four wells, Well 11, contributes over 40 percent of the groundwater. None of the wells have ever been closed due to contamination from hazardous substances.

CONTACT CONCURRENCE: Janet L. Borden DATE: NOV 03 1992

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CONTACT REPORT

AGENCY/AFFILIATION: Maywood Mutual Water Company No. 1		CODE: GW
DEPARTMENT:		
ADDRESS: 5953 Gifford Ave.	CITY: Huntington Park	
COUNTY: Los Angeles	STATE: CA	ZIP: 90255
CONTACT(S) Monte Jewett	TITLE	PHONE (213) 560-2439
BEI PERSON MAKING CONTACT: Maynard Geisler MG		DATE: 4/20/94
SUBJECT: Water Supply System		
SITE NAME: Shellmar Products Corporation	EPA ID: CAD 983576190	

DISCUSSION:

The Maywood Mutual Water Company No. 1 has two wells, Well 3 and Well 4, in its system. Well 3 is located at 6026 Carmelita Ave. in Huntington Park and Well 4 is located at 5953 Gifford Ave. in Huntington Park. Approximately 33 percent of the water supplied by the Maywood Mutual Water Company No. 1 is surface water imported from the Metropolitan Water District. Wells 3 and 4 each supply 33 percent of the system's supply. The Maywood Mutual Water Company No. 1 serves approximately 5,000 people. No contaminants have been detected is groundwater collected from these wells.

CONTACT CONCURRENCE: _____ **DATE:** _____

Monte Jewett

APR 29 1994

CONTACT REPORT

AGENCY/AFFILIATION: City of Downey		CODE: GW
DEPARTMENT: Water Division		
ADDRESS: 9252 Stewart and Gray Rd.	CITY: Downey	
COUNTY: Los Angeles	STATE: CA	ZIP: 90241
CONTACT(S) Tony Vasquez	TITLE [illegible]	PHONE (310) 904-7202
BEI PERSON MAKING CONTACT: Maynard Geisler MG		DATE: 4/20/94
SUBJECT: Water Supply System		
SITE NAME: Shellmar Products Corporation	EPA ID: CAD 983576190	

DISCUSSION:

The City of Downey Water Division operates 21 active water supply wells and five inactive water supply wells. There are no standby wells in the system. The 21 active wells are wells 1, 2, 4, 5, 7, 8, 9, 10, 12, 14, 15, 16, 17, 19, 23, 24, 25, [redacted], 28, 29, and 30. The inactive wells are wells 6, 21, 20, 26, and 27. Well 6 is inactive due to the presence of an oily substance in the groundwater pumped from this well. The source of the oily substance is unknown. Wells 21, 20, 26, and 27 are scheduled to be destroyed for reasons not related to groundwater contamination. Water supplied by the City of Downey Water Division is ~~100~~ 95 percent groundwater. Well 4 provides greater than [redacted] 13 percent of the system's water supply during the summer months (May through September). The are 23,000 service connections to the system.

CONTACT CONCURRENCE: Tony Vasquez **DATE:** 5-4-94

CONTACT REPORT

AGENCY/AFFILIATION: Jervis B. Webb Company of California (Jervis)		CODE:
DEPARTMENT:		
ADDRESS: 4550 Seville Ave., P.O. Box 58885	CITY: Los Angeles	
COUNTY: Los Angeles	STATE: CA	ZIP: 90058
CONTACT(S) Richard A. Lynn	TITLE Purchasing Agent	PHONE (213) 588-8271
BEI PERSON MAKING CONTACT: Virginia Demetrios VCD		DATE: 9/26/94
SUBJECT: Onsite operations		
SITE NAME: Jervis B. Webb	EPA ID: CAD 008339467	

DISCUSSION:

The following information was discussed during a telephone conversation with Mr. Lynn:

- From 1960 to 1984, Blake Rivet Co. operated a rivet stamping process on site. It is unknown what solvents were used or what type of waste was generated by this operation. All contents of the building were removed by Blake Rivet Co. in 1984, and the building is currently used as a warehouse by Jervis.

- Currently, all residue that falls onto the floor in the building is swept and the material placed into 55-gallon drums, stored, and removed by a permitted waste hauler.

- Mr. Lynn began working on site in 1977. He does not know if tetrachloroethane of trichloroethane were used in onsite practices prior to this time.

- The concrete-lined sump was probably built when the building was constructed in 1950. For Jervis operations, tap water was used in the sump process to separate the solids. No liquid from the sump was released into the sanitary sewer system. Approximately once a year, the contents of the sump were pumped and removed by a permitted waste hauler. The sump has been dry since approximately 1986.

- The water-based paint is applied in an onsite spray booth. Oil-based thinner, brushes, and rags are used to clean the paint spray guns. Waste from this cleaning process is placed into 55-gallon drums, stored, and removed from the site by a permitted waste hauler.

CONTACT CONCURRENCE: _____ **DATE:** _____

APPENDIX E

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Bechtel Environmental, Inc.
P.O. Box 193965
San Francisco, CA 94119-3965

OBSERVATIONS MADE BY: I-Pei Hsiu Hodge DATE: May 25, 1994

FACILITY REPRESENTATIVE(S) and TITLE(S):

Richard Lynn, Purchasing Agent
Randy Duston, Manager of Manufacturing

SITE: Jervis B. Webb Co.

EPA ID: CAD 008339467

A site reconnaissance was conducted at the Jervis B. Webb Co. site on May 25, 1994. The weather was overcast and the temperature was approximately 58°F. The Bechtel Environmental, Inc. (BEI) representative, I-Pei Hsiu Hodge, conducted the site reconnaissance with Richard Lynn and Randy Duston of the Jervis B. Webb Co. at 1:30 p.m. to gather information on the site location and size, site history, processes used, and any hazardous waste generated, treated, stored, or disposed of on site. BEI was provided with a packet of information prepared in response to BEI's letter dated May 2, 1994. The reconnaissance included a site tour during which photographs were taken.

The following information was obtained during the site reconnaissance:

The Jervis B. Webb site is located at 9301 Rayo Ave. and 5030 Firestone Blvd., both in South Gate, Calif. The site occupies approximately 2.5 acres in an industrial area. The site is bordered on the north by Firestone Boulevard, on the west by Union Pacific Railroad tracks, on the south by Rayo Avenue, and on the east by a plastic container manufacturing company at 9201 Rayo Ave. Adjacent to the west side of the site are Macleod Metals, Inc. and Firma, Inc. (aluminum recycling facilities) at 9309 Rayo Ave., and United Concrete. To the south of the site, across Rayo Avenue, are empty warehouses and manufacturing buildings, formerly occupied by Purex Corporation.

The site currently consists of an asphalt paved parking lot; a manufacturing building at 9301 Rayo Ave.; a high-bay area for storing raw steel; an equipment storage and testing building at 5030 Firestone Blvd.; a covered hazardous waste storage area attached to the equipment storage building; and asphalt-paved, miscellaneous storage areas. The site buildings are adjacent to each other and are surrounded by fencing. The site is entirely covered by asphalt pavement and buildings, except for landscaped areas in the parking lot and a grassy area north of the equipment storage building. The site buildings and paved storage areas are completely fenced. Mr. Lynn,

who began working at the site in 1977, believes that the site was paved during original construction.

The site was undeveloped agricultural land before 1950. The Jervis B. Webb Co. purchased the property at 9301 Rayo Ave. in 1950 and built the manufacturing building. The adjacent property at 5030 Firestone Blvd. was acquired by the Jervis B. Webb Co. in the 1960s. Both properties are currently owned by the Jervis B. Webb Company of Farmington, Michigan.

Jervis B. Webb has operated a custom conveyer and crane manufacturing facility at the site since the 1950s. Cranes have no longer been manufactured at the site since the 1970s. Currently, only conveyers and a few other specialty metal products are manufactured at the site. The manufacturing process consists of cutting, drilling, assembling, welding, and painting the steel pieces that comprise the final product. Hazardous substances used in the manufacturing process during past years of operation included oil-based paints with toluene and xylene, lacquer paint thinner, and 1,1,1-trichloroethane (used as a cleaning solvent). Painting was done over an 8,000-gallon recycled water sump. The sump would periodically be cleaned of paint sludge. Previously, approximately 300 gallons to 400 gallons per year of oil-based paints were used. Approximately 6 years ago, the oil-based paints were replaced with water-based enamel paints. Documentation is no longer available to determine the actual amount of paint sludge removed from the site. Approximately 5 to 10 years ago, the wet-painting process was replaced by a dry-paint spray booth. The sump was converted to house paint filters and the discharge is regulated by permit with the South Coast Air Quality Management District. According to Mr. Lynn, no cracks were visible in the sump when it was converted, and no regulatory oversight was required for its conversion. Samples were not collected from the bottom of the sump. Less painting is now done at the site; most of the work is subcontracted to other firms, primarily to reduce the amount of hazardous substances generated at the site. The decrease in amount of paint-waste generated is apparent from a review of the waste disposal manifests from 1990 through 1993.

According to Mr. Lynn, a solvent known as 1,1,1-trichor was used in the past. Less than 500 gallons per year of the 1,1,1-trichlor were used at the site, although no documentation is available for the number of years the solvent was used. The 1,1,1-trichlor was highly volatile and typically no waste solvent was generated. The solvent was first replaced by a citric-based solvent, which did not work very well. The citric-based solvent was then replaced by the currently used, petroleum-based solvent. Mr. Lynn was unable to provide documentation for hazardous substances used and generated prior to 1989. Mr. Lynn stated that the old records were discarded because the substances are no longer used at the site. In addition, reporting requirements prior to 1989 were not as stringent.

The building at 5030 Firestone Blvd. was occupied approximately 10 to 11 years ago by Blake Rivet Co., a rivet manufacturer. After Blake Rivet Co. vacated the building, the hazardous waste storage area was moved to 5030 Firestone Blvd. to separate the hazardous waste products from the virgin process materials. The hazardous waste storage area consists of a sheet-metal tray with the capacity for four 55-gallon barrels. The sheet-metal tray sides are approximately 5 inches tall. Currently, two barrels are in the tray; one contains used oil and the other contains used solvent/coolant. When the drums are full, a waste recycling firm arrives on site to pump out the drums for offsite recycling. Other hazardous substances generated at the site are waste rags, waste

paint filters, and waste paint/water mixtures. These wastes are hauled off site for disposal by a permitted waste transporter (Waste Material Management).

No monitoring wells are on site, no soil or groundwater sampling has been conducted onsite, and no underground storage tanks have been identified on site.

Approximately 12 employees work at the site 5 days a week. The operating times are 7 a.m. to 3:15 p.m. During peak production years, as many as 60 employees worked at the site.

The facility has a permit from the South Coast Air Quality Management District (Permit No. 156673) for the paint booth. No violations for the permit have been issued for the site. The Jervis B. Webb Co. has also applied for a group permit for stormwater runoff (No. 602). The Jervis B. Webb Co. is required to submit a Hazardous Materials Business Plan and Hazardous Materials Inventory List annually to the Los Angeles County Fire Department. The Hazardous Materials Business Plan describes emergency response plans and procedures, and employee training programs.

Surface water flows to the southeast at the site, into a storm drain that discharges into the Los Angeles River. The concrete-lined Los Angeles River is approximately 0.25 mile east of the site.

CONTACT REPORT

AGENCY/AFFILIATION: City of South Gate		CODE: GW
DEPARTMENT: Public Works Department		
ADDRESS: 4244 Santa Ana St.	CITY: South Gate	
COUNTY: Los Angeles	STATE: CA	ZIP: 90280
CONTACT(S) John Chambers	TITLE Water Department Supervisor	PHONE (213) 563-5790
BEI PERSON MAKING CONTACT: Maynard Geisler MG		DATE: 5/3/94
SUBJECT: City of South Gate Water Supply System		
SITE NAME: Shellmar Products Corporation	EPA ID: CAD 983576190	

DISCUSSION:

The City of South Gate operates 14 drinking water supply wells. Seven of the wells are active and seven of the wells are standby. Active wells include wells 2, 7, 14, 24, 25, 26, and 27. Standby wells include wells 13, 17, 18, 19, 20, 22B, and 23. Groundwater from standby wells 13, 17, 18, 19, and 22B contains perchloroethylene (PCE). These standby wells can be reactivated only if the groundwater is treated to remove the PCE. Standby wells 20 and 23 may be activated at any time. The City of South Gate water supply system uses 100 percent groundwater and supplies drinking water to approximately 75,000 people. No single well provides more than 40 percent of the total water supply. The attached data sheet lists City of South Gate well locations and capacities.

CONTACT CONCURRENCE: John E. Chambers **DATE:** 5-10-94

CITY OF SOUTH GATE
WELL PRODUCTION DATA
SYSTEM #1910152

STATE WELL #	OWNER WELL #	LOCATION	CAPACITY
02S/13W-35A01	2	3414 Ardmore Ave.	850 GP.M
02S/12W-31M02	7	4909 Mason St.	950 GP.M
03S/13W-01G01	8	10117 Kauffman Ave.	450 GP.M
03S/12W-06D01	13	South Gate Park	1650 GP.M
03S/12W-06D02	14	South Gate Park	2900 GP.M
03S/12W-06D03	18	South Gate Park	2500 GP.M
03S/12W-06D04	19	South Gate Park	2500 GP.M
02S/13W-36F02	20	S/W Corner Ardmore Ave. & Otis St.	850 GP.M
03S/12W-05M01	22-B	10740 Lee Lane	950 GP.M
03S/12W-06B03	23	9595 Salt Lake Ave.	1200 GP.M
02S/12W-31Q03	24	9021 W Frontage Rd.	3000 GP.M
02S/12W-31Q02	25	9021 W Frontage Rd.	3000 GP.M
02S/13W-34Q03	26	2541 Tweedy Blvd.	1600 GP.M
02S/13W-34R01	27	2645 Tweedy Blvd.	1800 GP.M

TANKS & RESERVOIRS

Hawkins Reservoir	9021 W. Frontage Rd.	2-2 1/2 Million Gals.
Santa Fe Tank	Santa Fe & Ardmore Ave.	500,000 Gals.
Kauffman Tank	10117 Kauffman Ave.	150,000 Gals.
Well #2 Tank	3414 Ardmore Ave.	150,000 Gals.
Salt Lake Tank	9595 Salt Lake Ave.	500,000 Gals.

~~332 00001~~
~~332 00025~~
A163 0010

CONTACT REPORT

AGENCY/AFFILIATION: City of Huntington Park, Department of Public Works		
DEPARTMENT:		
ADDRESS: 6900 Bissell Street	CITY: Huntington Park	
COUNTY: Los Angeles	STATE: CA	ZIP: 90255
CONTACT(S)	TITLE	PHONE
Mr. Bency Armijo		213-582-6161
BEI PERSON MAKING CONTACT: Gary Yao G.Y. GY		DATE: 9/24/92
SUBJECT: Information on the City of Huntington Park municipal water system		
SITE NAME: Indian Wells Estates, Inc.	EPA ID: CAD 008375776	

DISCUSSION:

Mr. Armijo informed me that the City of Huntington Park obtains all of its drinking water from four active groundwater wells. These wells are located at the following locations:

Well 12	Salt Lake Avenue and Santa Ana Street	perforation 522' - 1504'
Well 14	Randolph Street and Bissell Street	perforation 522' - 1500'
Well 16	Salt Lake Avenue and Florence Avenue	Depth 1465'
Well 17	Miles Avenue and Slauson Avenue	Depth 1412

Well 17 contributes approximately 40% of the total water supplied. Well 15 (located at Cottage Street and Saturn Avenue) was closed approximately 5 years ago due to trichloroethylene (TCE) contamination. The City of Huntington Park does not have any standby wells in its system. The city tests its active wells for hazardous substances once a month. According to Mr. Armijo, approximately 52,000 people are served by the ~~blended~~ groundwater municipal system.

CONTACT CONCURRENCE: Bency Armijo DATE: 9/28/92

CONTACT REPORT

AGENCY/AFFILIATION: City of Huntington Park		CODE: GW
DEPARTMENT: Department of Public Works		
ADDRESS: 6900 Bissell St.	CITY: Huntington Park	
COUNTY: Los Angeles	STATE: CA	ZIP: 90255
CONTACT(S) Bency Armijo	TITLE	PHONE (213) 587-5969
BEI PERSON MAKING CONTACT: Virginia Demetrios		DATE: 4/25/94
SUBJECT: City of Huntington Park municipal water system		
SITE NAME: Harshaw/Filtrol (Bandini Blvd Facility)	EPA ID: CAD 980884332	

DISCUSSION:

As we discussed during our telephone conversation, the information included in the attached contact report dated September 24, 1992 concerning the City of Huntington Park municipal water system is still accurate, except for the operation of two additional wells (wells 15 and 18). According to Mr. Armijo, Well 15, at Cottage Street and Saturn Avenue in Huntington Park, will be in full operation on April 26, 1994. The well had been closed due to trichloroethylene contamination. Under the direction of the Water Replenishment Department, Well 15 was remediated and currently meets state drinking water standards. Well 18 is located at 6900 Bissell St.

CONTACT CONCURRENCE: _____ **DATE:** _____

TABLE OF CONTENTS

Jervis B. Webb Site
5030 Firestone Blvd, South Gate, CA 90280
PCA Code: 11 series (11050, etc.) Site Code: 301286-00

Todd Wallbom Project Manager (as of January 2007; former Project Manager was Pete Cooke)

Date (yy,mm,dd)	Letter/Activity/Contact
1996-12-17	1. LACDPW issues certification of tank closure (underground sumps).
1997-01-16	2. Document by EKI. "Request for Reassessment of the Jervis B. Webb Company of California"
1997-02-27	3. Letter from USEPA to Jervis Webb (JW). Responding to RP request dated 1997-01-16 to de-list Rayo parcel from CERCLIS, as UST closure is complete. USEPA says to sample Rayo and Firestone parcels for VOCs.
1997-10-xx	4. Consultant for JW(EKI) soil investigation
1997-12-01	5. Soil gas survey performed.
1998-02-02	6. Cost Recovery letter from LARWQCB to JW. Indicates site was once used as a rivets factory. Soil impacted by PCE, TCE and other VOCs.
1998-02-18	7. Document by EKI. Phase II.
1998-02-19	8. Letter from EKI to LARWQCB. Cover letter for submittal of Phase II and other background documents.
1998-02-19	9. Letter from EKI to LARWQCB. Indicates EKI's October 1997 soil investigation. Indicates a meeting between at least EKI and LARWQCB took place on 1998-02-06. Letter conveys GW investigation WP, calling for three wells.
1998-02-25	10. Three GW monitoring wells installed.
1998-06-30	11. Document by EKI. Phase II GW IR.
1998-08-25	12. Letter from LARWQCB to JW. Annual Estimation of charges. Indicates quarterly GW monitoring plan is expected.
1998-09-04	13. Letter from LARWQCB to JW. Response to Phase II GW IR dated 1998-06-30. Three on-site and two off-site wells sampled. Directed to begin quarterly monitoring and determine extent of VOC plume.
1998-09-29	14. Letter from EKI to LARWQCB. WP for additional GW investigation including hydropunch, "push in plastic piezometer" and at least one more GW well. Begin quarterly GW monitoring. Propose to remove clarifier. Propose to submit WP for soil remediation.
1998-10-21	15. Letter from EKi to LARWQCB. Transmittal of results of additional GW investigation, proposal to install two new GW wells.

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1999-06-28 21. Letter from EKI to LARWQCB. GW monitoring plan.

1999-07-30 22. Document by EKI. Quarterly Progress Report, second quarter 1999.

1999-10-15 23. Document by EKI. Quarterly Progress Report, third quarter 1999.

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2000-09-18 28. Letter from LARWQCB. Comments on Quarterly Progress Report. Requires submittal of WP to fully delineate GW contamination.

2000-10-26 29. Document by EKI. Quarterly Progress Report, third quarter 2000.

2000-11-30 30. Document by EKI. WP for GW remediation.

2001-02-05 31. Document by EKI. Quarterly Progress Report, fourth quarter 2000. Request of NFA for soil.

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2001-05-22 33. Document by Dragun Corp. GW and Soil Evaluation Report. Conclusion is that GW contamination is from off site. JW seeking site closure.

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1996-12-17	1. LACDPW issues certification of tank closure (underground sumps).
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STATE OF CALIFORNIA
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL
SOUTHERN CALIFORNIA REGION
1011 N. GRANDVIEW AVENUE
GLENDALE, CALIFORNIA 91201

JAN 23 2002

Attn: Lori Parness

03

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

MR. MICHAEL FEELEY
LATHAM AND WATKINS
633 WEST FIFTH STREET, SUITE #4000
LOS ANGELES, CA. 90071

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
SOUTHERN CALIFORNIA SITE MITIGATION BRANCH

D. Is delivery address different from item 1? ☐ Yes
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PS Form 3811, August 2001 Domestic Return Receipt 102595-01-M-2509

REMED . SITE ASSESSMENT DECISION - EPA F ION IX

Site Name: Jervis B. Webb Co. **EPA ID #:** CAD008339467

Alias Site Names: Jervis B. Webb Company of California

City: South Gate **County or Parish:** Los Angeles **State:** California

Refer to Report Dated: 03/02 **Report Type:** GAO

Report developed by: Lori Parnass

DECISION:

☐ **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**

☐ 1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Action - NFA) and:

☐ EPA is retaining this site in CERCLIS because the Federal Superfund program still has an interest in the site.

☐ EPA is archiving this site in CERCLIS because it does not warrant Federal Superfund action, or an appropriate Federal Superfund response action has been completed. This means that EPA believes no further Federal Superfund response is appropriate. Archived sites may be returned to the CERCLIS site inventory if new information necessitating further Federal Superfund consideration is discovered.

☐ 1b. Site may qualify for further action, but is deferred to: ☐ RCRA ☐ NRC

☒ **2. Further Assessment Needed Under CERCLA** 2a.(Optional) Priority: ☐ Higher ☒ Lower

2b. Activity Type: ☐ PA ☐ SI ☐ ESI ☒ HRS Evaluation ☐ Other _____

DISCUSSION/RATIONALE:

Site has documented soil and groundwater contamination with VOCs and metals. There has been some source remediation and the RWQCB has issued a No Further Action determination for soils. Groundwater beneath the site still contains VOCs and metals greatly in excess of MCLs. Groundwater monitoring is continuing but no active clean-up. Site is in area with regional groundwater contamination

Report Reviewed, Approved and Site Decision Made by: J. Johnson **Signature:** [signature] **Date:** 5.15.02

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SINGAPORE
TOKYO
WASHINGTON, D.C.

January 30, 2002

Lori Parnass
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201

Re: 5030 Firestrone Blvd. and 9301 Rayo Ave., South Gate, CA

Dear Ms. Parnass:

As you requested, I am forwarding the following documents to you:

- IT, Soil Removal Activities, dated December 17, 2001;
- LARWQCB, Approval of "Work Plan for Clarifier Removal and Soil Remediation by Soil Vapor Extraction," dated May 18, 1999; and
- EKI, Report on Closure of Two Tanks at 9301 Rayo Avenue, dated December 10, 1996.

Please let me know if we can provide further information to you..

Yours very truly,

Michael Scott Feeley
of LATHAM & WATKINS

Enclosures

cc: Michael J. Farley

633 WEST FIFTH STREET, SUITE 4000 • LOS ANGELES, CALIFORNIA 90071-2007
TELEPHONE (213) 485-1234 • FAX (213) 891-8763

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SINGAPORE
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WASHINGTON, D.C.

January 29, 2002

BY HAND

Lori Parnass
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201

Re: 5030 Firestrone Blvd. and 9301 Rayo Ave., South Gate, CA (the "Property")

Dear Ms. Parnass:

As requested in the letter dated January 15, 2002 to me from Rita Kamat of DTSC, we are providing you with copies of the following:

- Los Angeles Regional Water Control Board *Soil Closure / No Further Action Letter* for the Property, dated January 23, 2002;
- IT Corporation, *Soil Closure Report,* dated October 3, 2001;
- Dragun Corporation and IT Corporation, *Groundwater and Soil Evaluation, 5030 Firestone Boulevard and 9301 Rayo Avenue, South Gate, California*, dated May 22, 2001.

These documents provide information responsive to Ms. Kamat's letter. In addition, we offer to provide you access to dozens of other environmental submissions regarding the Property which are in our possession. These include:

- IT Corporation *Soil Removal Report*, dated December 17, 2001,
- IT Corporation *Submittal of Soil Analytical Data Spreadsheets*, dated December 22, 2001;
- IT Corporation *Work Plan for Soil Closure, Jervis B. Webb, 5030 Firestone Boulevard and 9301 Rayo Avenue, South Gate, California,* dated June 25, 2001;
- IT Corporation, *Addendum to Work Plan for Soil Closure,* dated July 18, 2001.

633 WEST FIFTH STREET, SUITE 4000 • LOS ANGELES, CALIFORNIA 90071-2007
TELEPHONE (213) 485-1234 • FAX (213) 891-8763

- Erler and Kalinowski, Inc., *Phase I Environmental Site Assessment of the Jervis B. Webb Company Properties at 9301 Rayo Avenue and 5030 Firestone Boulevard, South Gate, California*, dated June 20, 1996;

- Erler and Kalinowski, Inc., *Phase II Soil Investigation Report for Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated February 18, 1998;

- Erler and Kalinowski, Inc., *Phase II Groundwater Investigation Report, Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated June 30, 1998;

- Erler and Kalinowski, Inc., *Transmittal of Results of Additional Groundwater Investigation and Proposed Well Installation*, dated October 21, 1998;

- Erler and Kalinowski, Inc., *Proposed Tasks, Schedule and Work Plan for Additional Groundwater Investigation and Quarterly Groundwater Monitoring*, dated September 29, 1998.

- Erler and Kalinowski, Inc., *Additional Groundwater Investigation and Quarterly Groundwater Monitoring Report for October to December 1998, Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California, dated January 13*, 1999;

- Erler and Kalinowski, Inc., *Work Plan for Clarifier and Removal and Soil Remediation by Soil Vapor Extraction at the Jervis B. Webb Company Property located at 5030 Firestone Boulevard, South Gate, California*, dated April 14, 1999;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for January through March 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated June 4, 1999;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for April through June 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated July 30, 1999;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for July to September 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated October 13, 1999;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for October to December 1999 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated February 4, 2000;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for January through March 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated April 27, 2000;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for April through June 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated August 16, 2000;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for July through September 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated October 26, 2000;

- Erler and Kalinowski, Inc., *Report on Site Conditions, Local Hydrogeology and Offsite Groundwater Production and Work Plan for Groundwater Remediation, Jervis B. Webb Company of California, 5030 Firestone Boulevard, South Gate, California*, dated November 30, 2000;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for October through December 2000 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated February 5, 2001;

- Erler and Kalinowski, Inc., *Quarterly Progress Report for April through June 2001 for the Jervis B. Webb Company Property, 5030 Firestone Boulevard, South Gate, California*, dated July 24, 2001.

Please contact me if you would like to conduct any further review and we can schedule a convenient time and date for you to visit our offices. My direct dial number is 213-891-7895.

Yours very truly,

Michael Scott Feeley
of LATHAM & WATKINS

cc: Michael J. Farley

Table 3 Summary of TCE and PCE Concentrations in Soil
5030 Firestone Boulevard
South Gate, California
Project #21025-02

Sample Number Depth (feet)	B1-5.5 5.5 mg/kg	B1-11 11 mg/kg	B1-20 20 mg/kg	B2-5.5 5.5 mg/kg	B2-10.5 10.5 mg/kg	B3-6 6 mg/kg	B3-11 11 mg/kg	B4-6 6 mg/kg	B4-16 16 mg/kg	B4-20.5 20.5 mg/kg	B5-6 6 mg/kg	B5-10.5 10.5 mg/kg	B6-6 6 mg/kg	B6-10.5 10.5 mg/kg	B7-6 6 mg/kg	B7-11 11 mg/kg	B8-6 6 mg/kg	B8-11 11 mg/kg	B9-5.5 5.5 mg/kg	B9-10.5 10.5 mg/kg	B10-6 6 mg/kg	B10-11 11 mg/kg	B11-6 6 mg/kg
PCE - tetrachloroethane	0.074	0.13	0.035	0.018	0.045	0.042	0.12	0.076	2.2	140	0.025	0.035	0.13	0.019	0.055	< 0.015	0.0029	0.041	0.0026	0.022	0.027	< 0.015	0.061
TCE - trichloroethene	0.024	0.037	0.04	0.0073	< 0.015	0.01	0.034	0.021	0.092	270	0.0053	0.19	0.031	0.025	0.019	< 0.015	< 0.0025	0.05	< 0.0025	0.041	0.0064	0.036	0.016
TCE/PCE	0.32	0.28	1.14	0.41	0.33	0.24	0.28	0.28	0.04	1.93	0.21	2.92	0.24	1.32	0.35	1	0.86	1.22	0.69	1.86	0.24	2.4	0.26

Sample Number Depth (feet)	B11-11 11 mg/kg	B12-6 6 mg/kg	B13-6 6 mg/kg	B15-10 10 mg/kg	B15-16 16 mg/kg	B15-20.5 20.5 mg/kg	B15-26.5 26.5 mg/kg	B15-31 31 mg/kg	B15-35.5 35.5 mg/kg	B15-40 40 mg/kg	B16-6 6 mg/kg	B16-11 11 mg/kg	B16-16 16 mg/kg	B16-21 21 mg/kg	B16-26 26 mg/kg	B16-31 31 mg/kg	B16-35.5 35.5 mg/kg	B16-41 41 mg/kg	B16-46 46 mg/kg	B16-51 51 mg/kg	B17-6 6 mg/kg	B17-11 11 mg/kg	B17-16 16 mg/kg
PCE - tetrachloroethane	< 0.014	< 0.0025	< 0.0025	< 0.005	< 0.005	< 0.005	0.054	0.041	0.026	< 0.005	< 0.005	< 0.005	0.027	0.041	0.047	0.027	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
TCE - trichloroethene	0.035	< 0.0025	< 0.0025	< 0.005	< 0.005	< 0.005	0.38	0.52	0.14	1.2	< 0.005	< 0.005	0.19	0.12	0.11	0.19	< 0.005	0.41	0.39	1.3	< 0.005	< 0.005	< 0.005
TCE/PCE	2.5	1	1	1	1	1	7.04	12.68	5.38	240	1	1	0.19	0.12	0.11	0.19	1	82	78	260	1	1	1

Sample Number Depth (feet)	B17-21 21 mg/kg	B17-26 26 mg/kg	B17-31.5 31.5 mg/kg	B17-36 36 mg/kg	B17-41 41 mg/kg	B17-46 46 mg/kg	B17-53.5 53.5 mg/kg	B18-11 11 mg/kg	B18-16 16 mg/kg	B18-21 21 mg/kg	B18-27 27 mg/kg	B18-31 31 mg/kg	B18-36 36 mg/kg	B18-41 41 mg/kg	B18-46 46 mg/kg	B19-16 16 mg/kg	B19-21 21 mg/kg	B19-26 26 mg/kg	B19-31 31 mg/kg	B19-36.5 36.5 mg/kg	B19-41 41 mg/kg	B19-46 46 mg/kg
PCE - tetrachloroethane	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.4	0.37	0.66	0.093	0.14	< 0.005	0.091	0.18	0.42	0.28	0.28	0.25	< 0.005	0.10	0.18
TCE - trichloroethene	< 0.005	0.048	0.056	1.4	1.7	1.6	1.4	0.11	0.61	16	0.75	2	0.056	2.3	8.7	9.2	1.8	1.5	1.2	0.11	4	4.3
TCE/PCE	1	8.6	11.2	280	240	320	280	0.28	1.65	24.24	8.06	14.29	11.2	25.27	48.33	0.46	6.43	5.36	4.8	22	25	23.89

Sample Number Depth (feet)	MW1-10.5 10.5 mg/kg	MW1-20.5 20.5 mg/kg	MW1-30.5 30.5 mg/kg	MW2-10.5 10.5 mg/kg	MW2-20.5 20.5 mg/kg	MW2-30.5 30.5 mg/kg	MW3-11 11 mg/kg	MW3-20.5 20.5 mg/kg	MW3-30.5 30.5 mg/kg	MW5-21 21 mg/kg	MW5-31 31 mg/kg	MW5-41 41 mg/kg
PCE - tetrachloroethane	0.021	0.023	0.011	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.0025	<0.0025	<0.050
TCE - trichloroethene	0.018	0.062	0.06	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	0.022	0.011	0.55
TCE/PCE	0.86	2.7	5.45	1	1	1	1	1	1	8.8	4.4	11

NOTES
1) Analyses performed by Orange Coast Analytical using EPA methods 8240 and 8010.
2) Samples from borings B1 through B13 collected on October 28, 1997. Samples from borings B15 through B19 collected December 1 and 2, 1997 (EKI, 1998a)
3) Samples from MW-1 through MW-3 collected in June 1998 (EKI, 1998b)
4) Samples from MW-5 collected in January 1999 (EKI, 1999a)
5) Data summarized from Erler & Kalinowski reports (EKI, 1998a, 1998b, 1999a)

STANDARD OFFER, AGREEMENT AND ESCROW INSTRUCTIONS FOR PURCHASE OF REAL ESTATE

(Non-Residential)

American Industrial Real Estate Association

January 25 2002
(Date for Reference Purposes)

1. Buyer.

1.1 Jose Ramirez and/or Assignee ("Buyer") hereby offers to purchase the real property, hereinafter described, from the owner thereof ("Seller") (collectively, the "Parties" or individually a "Party") through an escrow ("Escrow") to close on forty-five (45) days from date of Agreement ("Expected Closing Date") to be held by Commerce Escrow Company ("Escrow Holder") whose address is Personal Matters / Ex. 6 90017 - Attn. Phil Graf No. 211.383.0417 upon the terms and conditions set forth in this agreement ("Agreement"). Buyer shall have the right to assign Buyer's rights hereunder, but any such assignment shall not relieve Buyer of Buyer's obligations herein unless Seller expressly releases Buyer.

1.2 The term "Date of Agreement" as used herein shall be the date when by execution and delivery (as defined in paragraph 20.2) of this document or a subsequent counteroffer thereto, Buyer and Seller have reached agreement in writing whereby Seller agrees to sell, and Buyer agrees to purchase the Property upon terms accepted by both Parties.

2. Property.

2.1 The real property ("Property") that is the subject of this offer consists of (insert a brief physical description) an approximate 60,984 SF land parcel

is located in the City of South Gate, County of Los Angeles State of California, is commonly known by the street address of 5030 Firestone Blvd.

and is legally described as: provided through Escrow

(APN: 6222-005-024).

2.2 If the legal description of the Property is not complete or is inaccurate, this Agreement shall not be invalid and the legal description shall be completed or corrected to meet the requirements of Chicago Title Company - Attn: Mike Slinger ("Title Company"), which shall issue the title policy hereinafter described.

2.3 The Property includes, at no additional cost to Buyer, the permanent improvements thereon, including those items which the pursuant to applicable law are a part of the property, as well as the following items, if any, owned by Seller and at present located on the Property: electrical distribution systems (power panel, bus ducting, conduits, disconnects, lighting fixtures); telephone distribution systems (lines, jacks and connections only); space heaters; heating, ventilating, air conditioning equipment ("HVAC"); air lines; fire sprinkler systems; security and fire detection systems, carpets, window coverings; wall coverings; and None

(collectively, the "Improvements")

~~2.4 The fire sprinkler monitor: ☐ is owned by Seller and included in the Purchase Price, or ☐ is leased by Seller, and Buyer will need to negotiate a new lease with the fire monitoring company.~~

2.5 Except as provided in Paragraph 2.3, the Purchase Price does not include Seller's personal property, furniture and furnishings, and

3. Purchase Price.

3.1 The purchase price ("Purchase Price") to be paid by Buyer to Seller for the Property shall be $730,000.00 payable as follows:

(a) Cash down payment, including the Deposit as defined in paragraph 4.3 (or if an all cash transaction, the Purchase Price): $730,000.00

~~(Strike if not applicable)~~ ~~(b) Amount of "New Loan" as defined in paragraph 5.1, if any:~~ ~~$~~

~~(c) Buyer shall take title to the Property subject to the following existing deed(s) of trust ("Existing Deed(s) of Trust") securing the existing promissory note(s) ("Existing Note(s)"):~~

~~(i) An Existing Note ("First Note") with an unpaid principal balance as of the Closing of approximately: $~~

~~Said First Note is payable at $ per month, including interest at the rate of % per annum until paid (and/or the entire unpaid balance is due on).~~

~~(Strike if not applicable)~~

~~(ii) An Existing Note ("Second Note") with an unpaid principal balance as of the Closing of approximately: $~~

~~Said Second Note is payable at $ per month, including interest at the rate of % per annum until paid (and/or the entire unpaid balance is due on).~~

~~(Strike if not applicable)~~ ~~(d) Buyer shall give Seller a deed of trust ("Purchase Money Deed of Trust") on the Property, to secure the promissory note of Buyer to Seller described in paragraph 8 ("Purchase Money Note") in the amount of~~ ~~$~~

Total Purchase Price: $730,000.00

3.2 If Buyer is taking title to the Property subject to, or assuming, and Existing Deed of Trust and such deed of trust permits the beneficiary to demand payment of fees including, but not limited to, points, processing fees, and appraisal fees as a condition to the transfer of the Property, Buyer agrees to pay such fees up to a maximum of 1.5% of the unpaid principal balance of the applicable Existing Note.

4. Deposits.

Initials

JGR

Initials

4.1 ☐ Buyer has delivered to Broker a check in the sum of $ _____ payable to Escrow Holder, to be held by Broker until both Parties have executed this Agreement and the executed Agreement has been delivered to Escrow Holder, or ☑ Buyer shall deliver to Escrow Holder a check in the sum of $ 25,000.00 _____ within both Parties have executed this Agreement and the executed Agreement has been delivered to Escrow Holder. When cashed, the check shall be deposited into the Escrow's trust account to be applied toward the Purchase Price of the Property at the Closing. Should Buyer and Seller not enter into an agreement for purchase and sale, Buyer's check or funds shall, upon request by Buyer be promptly returned to Buyer.

4.2 Additional deposits:

(a) Within 5 business days after the Date of Agreement, Buyer shall deposit with Escrow Holder the additional sum of $ _____ to be applied to the Purchase Price at the Closing.

(b) Within 5 business days after the contingencies discussed in paragraph 9.1 (a) through (k) are approved or waived, Buyer shall deposit with Escrow Holder the additional sum of $ _____ to be applied to the Purchase Price at the Closing.

4.3 Escrow Holder shall deposit the funds deposited with it by Buyer pursuant to paragraphs 4.1 and 4.2 (collectively the "Deposit"), in a State of Federally chartered bank in an interest bearing account whose term is appropriate and consistent with the timing requirements of this transaction. The interest therefrom shall accrue to the benefit of Buyer, who hereby acknowledges that there may be penalties or interest forfeitures if the applicable instrument is redeemed prior to its specified maturity. Buyer's Federal Tax Identification Number is _____. NOTE: Such interest bearing account cannot be opened until Buyer's Federal Tax Identification Number is provided.

5. Financing Contingency. (Strike if not applicable)

5.1 This offer is contingent upon Buyer obtaining from an insurance company, financial institution or other lender, a commitment to lend to Buyer a sum equal to at least _____ % of the Purchase Price, at terms reasonably acceptable to Buyer. Such loan ("New Loan") shall be secured by the lien of a deed of mortgage on the Property. If this Agreement provides for Seller to carry back junior financing, then Seller shall have the right to approve the terms of the New Loan. Seller shall have 7 days from receipt of the commitment setting forth the proposed terms of the New Loan to approve or disapprove of such proposed terms. If Seller fails to notify Escrow Holder, in writing, of the disapproval within said 7 days it shall be conclusively presumed that Seller has approved the terms of the New Loan.

5.2 Buyer hereby agrees to diligently pursue obtaining the New Loan. If Buyer shall fail to notify its Broker, Escrow Holder and Seller, in writing within _____ days following the Date of Agreement, that the New Loan has not been obtained, it shall be conclusively presumed that Buyer has either obtained said New Loan or has waived this New Loan contingency.

5.3 If, after due diligence, Buyer shall notify its Broker, Escrow Holder and Seller, in writing, within the time specified in paragraph 5.2 hereof, that Buyer has not obtained said New Loan, this Agreement shall be terminated, and Buyer shall be entitled to the prompt return of the Deposit, plus any interest earned thereon, less only Escrow Holder and Title Company cancellation fees and costs, which Buyer shall pay.

6. Seller Financing (Purchase Money Note). (Strike if not applicable)

6.1 The Purchase Money Note shall provide for interest on unpaid principal at the rate of _____ % per annum, with principal and interest payable as follows: _____

_____ The Purchase Money Note and Purchase Money Deed of Trust shall be on the current forms commonly used by Escrow Holder, and be junior and subordinate only to the Existing Note(s) and/or the New Loan expressly called for in this Agreement.

6.2 The Purchase Money Note and/or the Purchase Money Deed of Trust shall contain provisions regarding the following (see also paragraph 6.3 (e)):

(a) Prepayment Principal may be prepaid in whole or in part at any time without penalty, at the option of the Buyer.

(b) Late Charge. A late charge of 5% shall be payable with respect to any payment of principal, interest, or other charges, not made within 10 days after it is due.

(c) Due On Sale. In the event the Buyer sells or transfers title to the Property or any portion thereof, then the Seller may, at Seller's option, require the entire unpaid balance of said Note to be paid in full.

6.3 If the Purchase Money Deed of Trust is to be subordinate to other financing, Escrow Holder shall, at Buyer's expense prepare and record on Seller's behalf a request for notice of default and/or sale with regard to each mortgage or deed of trust to which it will be subordinate.

6.4 WARNING: CALIFORNIA LAW DOES NOT ALLOW DEFICIENCY JUDGEMENTS ON SELLER FINANCING. IF BUYER ULTIMATELY DEFAULTS ON THE LOAN, SELLER'S SOLE REMEDY IS TO FORECLOSE ON THE PROPERTY.

7 Real Estate Brokers.

7.1 The following real estate broker(s) ("Brokers") and brokerage relationships exist in this transaction and are consented to by the Parties: (check the applicable boxes):

☑ COLLIERS SEELEY INTERNATIONAL, INC. _____ represents Seller exclusively ("Seller's Broker")

☐ _____ represents Buyer exclusively ("Buyer's Broker")

☐ _____ represents both Seller and Buyer ("Dual Agency").

The Parties acknowledge that Brokers are the procuring cause of this Agreement. See paragraph 24 for disclosures regarding the nature of a real estate agency relationship. Buyer shall use the services of Buyer's Broker exclusively in connection with any and all negotiations and offers with respect to the Property for a period of 1 year from the Date of Agreement.

7.2 Buyer and Seller each represent and warrant to the other that he/she/it has had no dealings with any person, firm, broker or finder in connection with the negotiation of this Agreement and/or the consummation of the purchase and sale contemplated herein, other than the Brokers named in paragraph 7.1, and no broker or other person, firm or entity, other than said Brokers is/are entitled to any commission or finder's fee in connection with this transaction as the result of any dealings or acts of such Party. Buyer and Seller do each hereby agree to indemnify, defend, protect and hold the other harmless from and against any costs, expenses or liability for compensation, commission or charges which may be claimed by any broker, finder or other similar party other than said named Brokers by reason of any dealings or act of the indemnifying Party.

8. Escrow and Closing.

8.1 Upon acceptance hereof by Seller, this Agreement, including any counter-offers incorporated herein by the Parties, shall constitute not only the agreement of purchase and sale between Buyer and Seller, but also instructions to Escrow Holder for the consummation of the Agreement through the Escrow. Escrow Holder shall not prepare any further escrow instructions restating or amending the Agreement unless specifically so instructed by the Parties or a Broker herein. Subject to the reasonable approval of the Parties, Escrow Holder may, however, include its standard general escrow provisions.

8.2 As soon as practical after the receipt of this Agreement and any relevant counteroffers, Escrow Holder shall ascertain the Date of Agreement (as defined in paragraphs 1.2 and 20.2 and advise the Parties and Brokers, in writing, of the date ascertained.

8.3 Escrow Holder is hereby authorized and instructed to conduct the Escrow in accordance with this Agreement, applicable law and custom and practice of the community in which Escrow Holder is located, including any reporting requirements of the Internal Revenue Code. In the event of a conflict between the law of the state where the Property is located and the law of the state where the Escrow Holder is located, the law of the state of the Property is located shall prevail.

8.4 Subject to satisfaction of the contingencies herein described, Escrow Holder shall close this escrow (the "Closing") by recording a general warranty deed (a grant deed in California) and the other documents required to be recorded, and by disbursing the funds and documents in accordance with this Agreement.

8.5 Buyer and Seller shall each pay one-half of the Escrow Holder's charges and Seller shall pay the usual recording fees and any transfer taxes. documentary transfer taxes. Seller shall pay the premium for a standard coverage owner's or joint protection policy of title insurance.

8.6 Escrow Holder shall verify that all of Buyer's contingencies have been satisfied or waived prior to Closing. The matters contained in paragraphs 9.1 subparagraphs (b), (c), (d), (e), (g), (i), (n), and (o), 9.4, 9.5, 12, 13, 14, 16, 18, 20, 21, 22, and 24 are, however, matters of agreement between the Parties only and are not instructions to Escrow Holder.

_____ Initials

2000 American Industrial Real Estate Association

Initials
Form OFA-4.A/00c

8.7 If this transaction is terminated for non-satisfaction and non-waiver of a Buyer's Contingency, as defined in paragraph 9.2, then neither of the Parties shall thereafter have any liability to the other under this Agreement, except to the extent of a breach of any affirmative covenant or warranty in this Agreement. In the event of such termination, Buyer shall be promptly refunded all funds deposited by Buyer with Escrow Holder, less only Title Company and Escrow Holder cancellation fees and costs, all of which shall be Buyer's obligation.

8.8 The Closing shall occur on the Expected Closing Date, or as soon thereafter as the Escrow is in condition for Closing; provided, however, that if the Closing does not occur by the Expected Closing Date and said Date is not extended by mutual instructions of the Parties, a Party not then in default under this Agreement may notify the other Party, Escrow Holder, and Brokers, in writing that, unless the Closing occurs within 5 business days following said notice, the Escrow shall be deemed terminated without further notice or instructions.

8.9 Except as otherwise provided herein, the termination of Escrow shall not relieve or release either Party from any obligation to pay Escrow Holder's fees and costs or constitute a waiver, release or discharge of any breach or default that has occurred in the performance of the obligations, agreements, covenants or warranties contained therein.

8.10 If this Escrow is terminated for any reason other than Seller's breach or default, then at Seller's request, and as a condition to the return of Buyer's deposit, Buyer shall within 5 days after written request deliver to Seller, at no charge, copies of all surveys, engineering studies, soil reports, maps, master plans, feasibility studies and other similar items prepared by or for Buyer that pertain to the Property. Provided, however, that Buyer shall not be required to deliver any such report if the written contract which Buyer entered into with the consultant who prepared such report specifically forbids the dissemination of the report to others.

9. **Contingencies to Closing.**

9.1 The Closing of this transaction is contingent upon the satisfaction or waiver of the following contingencies. **IF BUYER FAILS TO NOTIFY ESCROW HOLDER, IN WRITING, OF THE DISAPPROVAL OF ANY OF SAID CONTINGENCIES WITHIN THE TIME SPECIFIED THEREIN, IT SHALL BE CONCLUSIVELY PRESUMED THAT BUYER HAS APPROVED SUCH ITEM, MATTER OR DOCUMENT.** Buyer's conditional approval shall constitute disapproval, unless provision is made by the Seller within the time specified therefore by the Buyer in such conditional approval or by this Agreement, whichever is later, for the satisfaction of the condition imposed by the Buyer. Escrow Holder shall promptly provide all Parties with copies of any written disapproval or conditional approval which it receives. With regard to subparagraphs (a) through (i) the pre-printed time periods shall control unless a different number of days is inserted in the spaces provided.

(a) *Disclosure.* Seller shall make to Buyer, through escrow, all of the applicable disclosures required by law (See American Industrial Real Estate Association ("AIR") standard form entitled "Seller's Mandatory Disclosure Statement") and provide Buyer with a completed Property Information Sheet ("Property Information Sheet") concerning the Property, duly executed by or on behalf of Seller in the current form or equivalent to that published by the AIR within 10 or _____ days following the Date of Agreement. Buyer has 10 days from the receipt of said disclosures to approve or disapprove the matters disclosed.

(b) *Physical Inspection.* Buyer has 10 or _____ days from the receipt of the Property Information Sheet or the Date of Agreement, whichever is later, to satisfy itself with regard to the physical aspects and size of the Property.

(c) *Hazardous Substance Conditions Report.* Buyer has 10 or _____ days from the receipt of the Property Information Sheet or the Date of Agreement, whichever is later, to satisfy itself with regard to the environmental aspects of the Property. Seller recommends that Buyer obtain a Hazardous Substance Conditions Report concerning the Property and relevant adjoining properties. Any such report shall be paid for by Buyer. A "Hazardous Substance" for purposes of this Agreement is defined as any substance whose nature and/or quantity of existence, use, manufacture, disposal or effect, render it subject to Federal, state or local regulation, investigation, remediation or removal as potentially injurious to public health or welfare. A "Hazardous Substance Condition" for purposes of this Agreement is defined as the existence on, under or relevantly adjacent to the Property of a Hazardous Substance that would require remediation and/or removal under applicable Federal, state or local law.

(d) *Soil Inspection.* Buyer has 10 or _____ days from the receipt of the Property Information Sheet or the Date of Agreement, whichever is later, to satisfy itself with regard to the condition of the soils on the Property. Seller recommends that Buyer obtain a soil test report. Any such report shall be paid for by Buyer. Seller shall provide Buyer copies of any soils report that Seller may have within 10 days of the Date of Agreement.

(e) *Governmental Approvals.* Buyer has 10 or _____ days from the Date of Agreement to satisfy itself with regard to approvals and permits from governmental agencies or departments which have or may have jurisdiction over the Property and which Buyer deems necessary or desirable in connection with its intended use of the Property, including, but not limited to, permits and approvals required with respect to zoning, planning, building and safety, fire, police, handicapped and Americans with Disabilities Act requirements, transportation and environmental matters.

(f) *Conditions of Title.* Escrow Holder shall cause a current commitment for title insurance ("Title Commitment") concerning the Property issued by the Title Company, as well as legible copies of all documents referred to in the Title Commitment ("Underlying Documents") to be delivered to Buyer within 10 or _____ days following the Date of Agreement. Buyer has 10 days from the receipt of the Title Commitment and Underlying Documents to satisfy itself with regard to the condition of title. The disapproval of Buyer of any monetary encumbrance, which by the terms of this Agreement is not to remain against the Property after the Closing, shall not be considered a failure of this contingency, as Seller shall have the obligation, at Seller's expense, to satisfy and remove such disapproved monetary encumbrance at or before the Closing.

(g) *Survey.* Buyer has 10 or _____ days from the receipt of the Title Commitment and Underlying Documents to satisfy itself with regard to any ALTA title supplement based upon a survey prepared to American Land Title Association ("ALTA") standards for an owner's policy by a licensed surveyor showing the legal description and boundary lines of the Property, any easements of record, and any improvements, poles, structures and things located within 10 feet of either side of the Property boundary lines. Any such survey shall be prepared at Buyer's direction and expense. If Buyer has obtained the survey and approved the ALTA title supplement, Buyer may elect within the period allowed for Buyer's approval of a survey to have an ALTA extended coverage owner's form of title policy, in which event Buyer shall pay any additional premium attributable thereto.

(h) *Existing Leases and Tenancy Statements.* Seller shall within 10 or _____ days of the Date of Agreement provide both Buyer and Escrow Holder with legible copies of all leases, subleases or rental arrangements (collectively, "Existing Leases") affecting the Property, and with a tenancy statement ("Estoppel Certificate") in the latest form or equivalent to that published by the AIR, executed by Seller and/or each tenant and subtenant of the Property. Seller shall use its best efforts to have each tenant complete and execute an Estoppel Certificate. If any tenant fails or refuses to provide an Estoppel Certificate then Seller shall complete and execute an Estoppel Certificate for that tenancy. Buyer has 10 days from the receipt of said Existing Leases and Estoppel Certificates to satisfy itself with regard to the Existing Leases and any other tenancy issues.

(i) *Other Agreements.* Seller shall within 10 or _____ days of the Date of Agreement provide Buyer with legible copies of all other agreements ("Other Agreements") known to Seller that will affect the Property after Closing. Buyer has 10 days from the receipt of said Other Agreements to satisfy itself with regard to such Agreements.

(j) *Financing.* If paragraph 5 hereof dealing with a financing contingency has not been stricken, the satisfaction or waiver of such financing contingency.

(k) *Existing Notes.* If paragraph 3.1(c) has not been stricken, Seller shall within 10 or _____ days of the Date of Agreement provide Buyer with legible copies of the Existing Notes, Existing Deeds of Trust and related agreements (collectively, "Loan Documents") to which the Property will remain subject after the Closing. Escrow Holder shall promptly request from the holders of the Existing Notes a beneficiary statement ("Beneficiary Statement") confirming: (1) the amount of the unpaid principal balance, the current interest rate, and the date to which interest is paid, and (2) the nature and amount of any impounds held by the beneficiary in connection with such loan. Buyer has 10 or _____ days from the receipt of the Loan Documents and Beneficiary Statements to satisfy itself with regard to such financing. Buyer's obligation to close is conditioned upon Buyer being able to purchase the Property without acceleration or change in the terms of any Existing Notes or charges to Buyer except as otherwise provided in this Agreement or approved by Buyer, provided, however, Buyer shall pay the transfer fee referred to in paragraph 3.2 hereof.

(l) *Personal Property.* In the event that any personal property is included in the Purchase Price, Buyer has 10 or _____ days from the Date of Agreement to satisfy itself with regard to the title condition of such personal property. Seller recommends that Buyer obtain a UCC-1 report. Any such report shall be paid for by Buyer. Seller shall provide Buyer copies of any liens or encumbrances affecting such personal property that it is aware of within 10 or _____ days of the Date of Agreement.

(m) *Destruction, Damage or Loss.* There shall not have occurred prior to the Closing, a destruction of, or damage or loss to, the Property or any portion thereof, from any cause whatsoever, which would cost more than $10,000.00 to repair or cure. If the cost of repair or cure is $10,000.00 or less, Seller shall repair or cure the loss prior to the Closing. Buyer shall have the option, within 10 days after receipt of written notice of a loss costing more than $10,000.00 to repair or cure, to either terminate this transaction or to purchase the Property notwithstanding such loss, but without deduction or offset against the Purchase Price. If the cost to repair or cure is more than $10,000.00, and Buyer does not elect to terminate this transaction, Buyer shall be entitled to any insurance proceeds applicable to such loss. Unless otherwise notified in writing, Escrow Holder shall assume no such destruction, damage or loss has occurred prior to Closing.

(n) *Material Change.* Buyer shall have 10 days following receipt of written notice of a Material Change within which to satisfy itself with regard to such change. "Material Change" shall mean a change in the status of the use, occupancy, tenants, or condition of the Property that occurs after the date of this offer and prior to the Closing. Unless otherwise notified in writing, Escrow Holder shall assume that no Material Change has occurred prior to the

Initials

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Closing.

(o) *Seller Performance*. The delivery of all documents and the due performance by Seller of each and every undertaking and agreement to be performed by Seller under this Agreement.

(p) *Warranties*. That each representation and warranty of Seller herein be true and correct as of the Closing. Escrow Holder shall assume that this condition has been satisfied unless notified to the contrary in writing by any Party prior to the Closing.

(q) *Brokerage Fee*. Payment at the Closing of such brokerage fee as is specified in this Agreement or later written instructions to Escrow Holder executed by Seller and Brokers ("Brokerage Fee"). It is agreed by the Parties and Escrow Holder that Brokers are a third party beneficiary of this Agreement insofar as the Brokerage Fee is concerned, and that no change shall be made with respect to the payment of the Brokerage Fee specified in this Agreement, without the written consent of Brokers.

9.2 All of the contingencies specified in subparagraphs (a) through (p) of paragraph 9.1 are for the benefit of, and may be waived by, Buyer, and may be elsewhere herein referred to as "Buyer Contingencies."

~~9.3 If any Buyer's Contingency or any other matter subject to Buyer's approval is disapproved as provided for herein in a timely manner ("Disapproved Item"), Seller shall have the right within 10 days following the receipt of notice of Buyer's disapproval to elect to cure such Disapproved Item prior to the Expected Closing Date ("Seller's Election"). Seller's failure to give to Buyer within such period, written notice of Seller's commitment to cure such Disapproved Item on or before the Expected Closing Date shall be conclusively presumed to be Seller's Election not to cure such Disapproved Item. If Seller elects, either by written notice or failure to give written notice, not to cure a Disapproved Item, Buyer shall have the election, within 10 days after Seller's Election to either accept title to the Property subject to such Disapproved Item, or to terminate this transaction. Buyer's failure to notify Seller in writing of Buyer's election to accept title to the Property subject to the Disapproved Item without deduction or offset shall constitute Buyer's election to terminate this transaction. Unless expressly provided otherwise herein, Seller's right to cure shall not apply to the remediation of Hazardous Substance Conditions or to the Financing Contingency. Unless the Parties mutually instruct otherwise, if the time periods for the satisfaction of contingencies or for Seller's and Buyer's said Elections would expire on a date after the Expected Closing Date, the Expected Closing Date shall be deemed extended for 3 business days following the expiration of: (a) the applicable contingency period(s), (b) the period within which the Seller may elect to cure the Disapproved Item, or (c) if Seller elects not to cure, the period within which Buyer may elect to proceed with this transaction, whichever is later.~~

9.4 Buyer understands and agrees that until such time as all Buyer's Contingencies have been satisfied or waived, Seller and/or its agents may solicit, entertain and/or accept back-up offers to purchase the subject Property.

9.5 The Parties acknowledge that extensive local, state and Federal legislation establish broad liability upon owners and/or users of real property for the investigation and remediation of Hazardous Substances. The determination of the existence of a Hazardous Substance Condition and the evaluation of the impact of such a condition are highly technical and beyond the expertise of Brokers. The Parties acknowledge that they have been advised by Brokers to consult their own technical and legal experts with respect to the possible presence of Hazardous Substances on the Property or adjoining properties, and Buyer and Seller are not relying upon any investigation by or statement of Brokers with respect thereto. The Parties hereby assume all responsibility for the impact of such Hazardous Substances upon their respective interests herein.

10. Documents Required at or before Closing:

10.1 Five days prior to the Closing date Escrow Holder shall obtain an updated Title Commitment concerning the Property from the Title Company and provide copies thereof to each of the Parties.

10.2 Seller shall deliver to Escrow Holder in time for delivery to Buyer at the Closing:

(a) Grant or general warranty deed, duly executed and in recordable form, conveying fee title to the Property to Buyer.

(b) If applicable, the Beneficiary Statements concerning Existing Note(s).

(c) If applicable, the Existing Leases and Other Agreements together with duly executed assignments thereof by Seller and Buyer. The assignment of Existing Leases shall be on the most recent Assignment and Assumption of Lessor's Interest in Lease form published by the AIR or its equivalent.

(d) If applicable, Estoppel Certificates executed by Seller and/or the tenant(s) of the Property.

(e) An affidavit executed by Seller to the effect that Seller is not a "foreign person" within the meaning of Internal Revenue Code Section 1445 or successor statutes. If Seller does not provide such affidavit in form reasonably satisfactory to Buyer at least 3 business days prior to the Closing, Escrow Holder shall at the Closing deduct from Seller's proceeds and remit to Internal Revenue Service such sum as is required by applicable Federal law with respect to purchases from foreign sellers.

(f) If the Property is located in California, an affidavit executed by Seller to the effect that Seller is not a "nonresident" within the meaning of California Revenue and Tax Code Section 18662 or successor statutes. If Seller does not provide such affidavit in form reasonably satisfactory to Buyer at least 3 business days prior to the Closing, Escrow Holder shall at the Closing deduct from Seller's proceeds and remit to the Franchise Tax Board such sum as is required by such statute.

(g) If applicable, a bill of sale, duly executed, conveying title to any included personal property to Buyer.

(h) If the Seller is a corporation, a duly executed corporate resolution authorizing the execution of this Agreement and the sale of the Property.

10.3 Buyer shall deliver to Seller through Escrow:

(a) The cash portion of the Purchase Price and such additional sums as are required of Buyer under this Agreement shall be deposited by Buyer with Escrow Holder, by federal funds wire transfer, or any other method acceptable to Escrow Holder as immediately collectable funds, no later than 2:00 P.M. on the business day prior to the Expected Closing Date.

(b) If a Purchase Money Note and Purchase Money Deed of Trust are called for by this Agreement, the duly executed originals of those documents, the Purchase Money Deed of Trust being in recordable form, together with evidence of fire insurance on the improvements in the amount of the full replacement cost naming Seller as a mortgage loss payee, and a real estate tax service contract (at Buyer's expense), assuring Seller of notice of the status of payment of real property taxes during the life of the Purchase Money Note.

(c) The Assignment and Assumption of Lessor's Interest in Lease form specified in paragraph 10.2(c) above, duly executed by Buyer.

(d) Assumptions duly executed by Buyer of the obligations of Seller that accrue after Closing under any Other Agreements.

(e) If applicable, a written assumption duly executed by Buyer of the loan documents with respect to Existing Notes.

(f) If the Buyer is a corporation, a duly executed corporate resolution authorizing the execution of this Agreement and the purchase of the Property.

10.4 At Closing, Escrow Holder shall cause to be issued to Buyer a standard coverage (or ALTA extended, if elected pursuant to 9.1(g)) owner's form policy of title insurance effective as of the Closing, issued by the Title Company in the full amount of the Purchase Price, insuring title to the Property vested in Buyer, subject only to the exceptions approved by Buyer. In the event there is a Purchase Money Deed of Trust in this transaction, the policy of title insurance shall be a joint protection policy insuring both Buyer and Seller.

IMPORTANT: IN A PURCHASE OR EXCHANGE OF REAL PROPERTY, IT MAY BE ADVISABLE TO OBTAIN TITLE INSURANCE IN CONNECTION WITH THE CLOSE OF ESCROW SINCE THERE MAY BE PRIOR RECORDED LIENS AND ENCUMBRANCES WHICH AFFECT YOUR INTEREST IN THE PROPERTY BEING ACQUIRED. A NEW POLICY OF TITLE INSURANCE SHOULD BE OBTAINED IN ORDER TO ENSURE YOUR INTEREST IN THE PROPERTY THAT YOU ARE ACQUIRING.

11. Prorations and Adjustments.

11.1 *Taxes*. Applicable real property taxes and special assessment bonds shall be prorated through Escrow as of the date of the Closing, based upon the latest tax bill available. The Parties agree to prorate as of the Closing any taxes assessed against the Property by supplemental bill levied by reason of events occurring prior to the Closing. Payment of the prorated amount shall be made promptly in cash upon receipt of a copy of any supplemental bill.

11.2 *Insurance*. **WARNING:** Any insurance which Seller maintained will terminate on the Closing. Buyer is advised to obtain appropriate insurance to cover the Property.

11.3 *Rentals, Interest and Expenses*. Scheduled rentals, interest on Existing Notes, utilities, and operating expenses shall be prorated as of the date of Closing. The Parties agree to promptly adjust between themselves outside of Escrow any rents received after the Closing.

11.4 *Security Deposit*. Security Deposits held by Seller shall be given to Buyer as a credit to the cash required of Buyer at the Closing.

11.5 *Post Closing Matters*. Any item to be prorated that is not determined or determinable at the Closing shall be promptly adjusted by the Parties by appropriate cash payment outside of the Escrow when the amount due is determined.

11.6 *Variations in Existing Note Balances*. In the event that Buyer is purchasing the Property subject to an Existing Deed of Trust(s), and in the event that a Beneficiary Statement as to the applicable Existing Note(s) discloses that the unpaid principal balance of such Existing Note(s) at the Closing will be more or less than the amount set forth in paragraph 3.1(c) hereof ("Existing Note Variation"), then the Purchase Money Note(s) shall be reduced or increased by an amount equal to such Existing Note Variation. If there is to be no Purchase Money Note, the cash required at the Closing per paragraph 3.1(a) shall be reduced or increased by the amount of such Existing Note Variation.

11.7 *Variations in New Loan Balance*. In the event Buyer is obtaining a New Loan and the amount ultimately obtained exceeds the amount set forth in paragraph 5.1, then the amount of the Purchase Money Note, if any, shall be reduced by the amount of such excess.

12. Representation and Warranties of Seller and Disclaimers.

12.1 Seller's warranties and representations shall survive the Closing and delivery of the deed for a period of 3 years, and, are true, material and relied upon by Buyer and Brokers in all respects. Seller hereby makes the following warranties and representations to Buyer and Brokers:

(a) *Authority of Seller*. Seller is the owner of the Property and/or has the full right, power and authority to sell, convey and transfer the Property to Buyer as provided herein, and to perform Seller's obligations hereunder.

(b) *Maintenance During Escrow and Equipment Condition At Closing*. Except as otherwise provided in paragraph 9.1(m) hereof, Seller shall maintain the Property until the Closing in its present condition, ordinary wear and tear excepted. The HVAC, plumbing, elevators, loading doors and electrical systems shall be in good operating order and condition at the time of Closing.

Initials ______ Initials ______

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(c) *Hazardous Substances/Storage Tanks.* Seller has no knowledge, except as otherwise disclosed to Buyer in writing, of the existence or prior existence on the Property of any Hazardous Substance, nor of the existence or prior existence of any above or below ground storage tank.

(d) *Compliance.* Seller has no knowledge of any aspect or condition of the Property which violates applicable laws, rules, regulations, codes or covenants, conditions or restrictions, or of improvements or alterations made to the Property without a permit where one was required, or of any unfulfilled order or directive of any applicable governmental agency or casualty insurance company requiring any investigation, remediation, repair, maintenance or improvement be performed on the Property.

(e) *Changes in Agreements.* Prior to the Closing, Seller will not violate or modify any Existing Lease or Other Agreement, or create any new leases or other agreements affecting the Property, without Buyer's written approval, which approval will not be unreasonably withheld.

(f) *Possessory Rights.* Seller has no knowledge that anyone will, at the Closing, have any right to possession of the Property, except as disclosed by this Agreement or otherwise in writing to Buyer.

(g) *Mechanics' Liens.* There are no unsatisfied mechanics' or materialmens' lien rights concerning the Property.

(h) *Actions, Suits or Proceedings.* Seller has no knowledge of any actions, suits or proceedings pending or threatened before any commission, board, bureau, agency, arbitrator, court or tribunal that would affect the Property or the right to occupy or utilize same.

(i) *Notice of Changes.* Seller will promptly notify Buyer and Brokers in writing of any Material Change (see paragraph 9.1(n)) affecting the Property that becomes known to Seller prior to the Closing.

(j) *No Tenant Bankruptcy Proceedings.* Seller has no notice or knowledge that any tenant of the Property is the subject of a bankruptcy or insolvency proceeding.

(k) *No Seller Bankruptcy Proceedings.* Seller is not the subject of a bankruptcy, insolvency or probate proceeding.

(l) *Personal Property.* Seller has no knowledge that anyone will, at the Closing, have any right to possession of any personal property included in the Purchase Price nor knowledge of any liens or encumbrances affecting such personal property, except as disclosed by this Agreement or otherwise in writing to Buyer.

12.2 Buyer hereby acknowledges that, except as otherwise stated in this Agreement, Buyer is purchasing the Property in its existing condition and will, by the time called for herein, make or have waived all inspections of the Property Buyer believes are necessary to protect its own interest in, and its contemplated use of, the Property. The Parties acknowledge that, except as otherwise stated in this Agreement, no representations, inducements, promises, agreements, assurances, oral or written, concerning the Property, or any aspect of the occupational safety and health laws, Hazardous Substance laws, or any other act, ordinance or law, have been made by either Party or Brokers, or relied upon by either Party hereto.

12.3 In the event that Buyer learns that a Seller representation or warranty might be untrue prior to the Closing, and Buyer elects to purchase the Property anyway then, and in that event, Buyer waives any right that it may have to bring an action or proceeding against Seller or Brokers regarding said representation or warranty.

12.4 Any environmental reports, soils reports, surveys, and other similar documents which were prepared by third party consultants and provided to Buyer by Seller or Seller's representatives, have been delivered as an accommodation to Buyer and without any representation or warranty as to the sufficiency, accuracy, completeness, and/or validity of said documents, all of which Buyer relies on at its own risk. Seller believes said documents to be accurate, but Buyer is advised to retain appropriate consultants to review said documents and investigate the Property.

13. Possession.

Possession of the Property shall be given to Buyer at the Closing subject to the rights of tenants under Existing Leases.

14. Buyer's Entry.

At any time during the Escrow period, Buyer, and its agents and representatives, shall have the right at reasonable times and subject to rights of tenants, to enter upon the Property for the purpose of making inspections and tests specified in this Agreement. No destructive testing shall be conducted, however, without Seller's prior approval which shall not be unreasonably withheld. Following any such entry or work, unless otherwise directed in writing by Seller, Buyer shall return the Property to the condition it was in prior to such entry or work, including the recompaction or removal of any disrupted soil or material as Seller may reasonably direct. All such inspections and tests and any other work conducted or materials furnished with respect to the Property by or for Buyer shall be paid for by Buyer as and when due and Buyer shall indemnify, defend, protect and hold harmless Seller and the Property of and from any and all claims, liabilities, losses, expenses (including reasonable attorneys' fees), damages, including those for injury to person or property, arising out of or relating to any such work or materials or the acts or omissions of Buyer, its agents or employees in connection therewith.

15. Further Documents and Assurances.

The Parties shall each, diligently and in good faith, undertake all actions and procedures reasonably required to place the Escrow in condition for Closing as and when required by this Agreement. The Parties agree to provide all further information, and to execute and deliver all further documents, reasonably required by Escrow Holder or the Title Company.

16. Attorneys' Fees.

If any Party or Broker brings an action or proceeding (including arbitration) involving the Property whether founded in tort, contract or equity, or to declare rights hereunder, the Prevailing Party (as hereafter defined) in any such proceeding, action, or appeal thereon, shall be entitled to reasonable attorneys' fees. Such fees may be awarded in the same suit or recovered in a separate suit, whether or not such action or proceeding is pursued to decision or judgment. The term "Prevailing Party" shall include, without limitation, a Party or Broker who substantially obtains or defeats the relief sought, as the case may be, whether by compromise, settlement, judgment, or the abandonment by the other Party or Broker of its claim or defense. The attorneys' fees award shall not be computed in accordance with any court fee schedule, but shall be such as to fully reimburse all attorneys' fees reasonably incurred.

17. Prior Agreements/Amendments.

17.1 This Agreement supersedes any and all prior agreements between Seller and Buyer regarding the Property.

17.2 Amendments to this Agreement are effective only if made in writing and executed by Buyer and Seller.

18. Broker's Rights.

18.1 If this sale is not consummated due to the default of either the Buyer or Seller, the defaulting Party shall be liable to and shall pay to Brokers the Brokerage Fee that Brokers would have received had the sale been consummated. If Buyer is the defaulting party, payment of said Brokerage Fee is in addition to any obligation with respect to liquidated or other damages.

18.2 Upon the Closing, Brokers are authorized to publicize the facts of this transaction.

19. Notices.

19.1 Whenever any Party, Escrow Holder or Brokers herein shall desire to give or serve any notice, demand, request, approval, disapproval or other communication, each such communication shall be in writing and shall be delivered personally, by messenger or by mail, postage prepaid, to the address set forth in this Agreement or by facsimile transmission.

19.2 Service of any such communication shall be deemed made on the date of actual receipt if personally delivered. Any such communication sent by regular mail shall be deemed given 48 hours after the same is mailed. Communications sent by United States Express Mail or overnight courier that guarantee next day delivery shall be deemed delivered 24 hours after delivery of the same to the Postal Service or courier. Communications transmitted by facsimile transmission shall be deemed delivered upon telephonic confirmation of receipt (confirmation report from fax machine is sufficient), provided a copy is also delivered via delivery or mail. If such communication is received on a Saturday, Sunday or legal holiday, it shall be deemed received on the next business day.

19.3 Any Party or Broker hereto may from time to time, by notice in writing, designate a different address to which, or a different person or additional persons to whom, all communications are thereafter to be made.

20. Duration of Offer.

20.1 If this offer is not accepted by Seller on or before 5:00 P.M. according to the time standard applicable to the city of Los Angeles on the date of February 5, 2002 ______ it shall be deemed automatically revoked.

20.2 The acceptance of this offer, or of any subsequent counteroffer hereto, that creates an agreement between the Parties as described in paragraph 1.2, shall be deemed made upon delivery to the other Party or either Broker herein of a duly executed writing unconditionally accepting the last outstanding offer or counteroffer.

21. LIQUIDATED DAMAGES. *(This Liquidated Damages paragraph is applicable only if initialed by both Parties).*

THE PARTIES AGREE THAT IT WOULD BE IMPRACTICABLE OR EXTREMELY DIFFICULT TO FIX, PRIOR TO SIGNING THIS AGREEMENT, THE ACTUAL DAMAGES WHICH WOULD BE SUFFERED BY SELLER IF BUYER FAILS TO PERFORM ITS OBLIGATIONS UNDER THIS AGREEMENT. THEREFORE, IF, AFTER THE SATISFACTION OR WAIVER OF ALL CONTINGENCIES PROVIDED FOR THE BUYER'S BENEFIT, BUYER BREACHES THIS AGREEMENT, SELLER SHALL BE ENTITLED TO LIQUIDATED DAMAGES IN THE AMOUNT OF $25,000.00 UPON PAYMENT OF SAID SUM TO SELLER, BUYER SHALL BE RELEASED FROM ANY FURTHER LIABILITY TO SELLER, AND ANY ESCROW CANCELLATION FEES AND TITLE COMPANY CHARGES SHALL BE PAID BY SELLER.

SG ______ *Buyer Initials*   JF ______ *Seller Initials*

______ Initials   SG ______ Initials

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22. ARBITRATION OF DISPUTES. *(This Arbitration of Disputes paragraph is applicable only if initialed by both Parties.)*

22.1 ANY CONTROVERSY AS TO WHETHER SELLER IS ENTITLED TO THE LIQUIDATED DAMAGES AND/OR BUYER IS ENTITLED TO THE RETURN OF DEPOSIT MONEY, SHALL BE DETERMINED BY BINDING ARBITRATION BY, AND UNDER THE COMMERCIAL RULES OF THE AMERICAN ARBITRATION ASSOCIATION ("COMMERCIAL RULES"). ARBITRATION HEARINGS SHALL BE HELD IN THE COUNTY WHERE THE PROPERTY IS LOCATED. ANY SUCH CONTROVERSY SHALL BE ARBITRATED BY 3 ARBITRATORS WHO SHALL BE IMPARTIAL REAL ESTATE BROKERS WITH AT LEAST 5 YEARS OF FULL TIME EXPERIENCE IN BOTH THE AREA WHERE THE PROPERTY IS LOCATED AND THE TYPE OF REAL ESTATE THAT IS THE SUBJECT OF THIS AGREEMENT. THEY SHALL BE APPOINTED UNDER THE COMMERCIAL RULES. THE ARBITRATORS SHALL HEAR AND DETERMINE SAID CONTROVERSY IN ACCORDANCE WITH APPLICABLE LAW, THE INTENTION OF THE PARTIES AS EXPRESSED IN THIS AGREEMENT AND ANY AMENDMENTS THERETO, AND UPON THE EVIDENCE PRODUCED AT AN ARBITRATION HEARING. PRE-ARBITRATION DISCOVERY SHALL BE PERMITTED IN ACCORDANCE WITH THE COMMERCIAL RULES OR STATE LAW APPLICABLE TO ARBITRATION PROCEEDINGS. THE AWARD SHALL BE EXECUTED BY AT LEAST 2 OF THE 3 ARBITRATORS, BE RENDERED WITHIN 30 DAYS AFTER THE CONCLUSION OF THE HEARING, AND MAY INCLUDE ATTORNEYS' FEES AND COSTS TO THE PREVAILING PARTY PER PARAGRAPH 16 HEREOF. JUDGMENT MAY BE ENTERED ON THE AWARD IN ANY COURT OF COMPETENT JURISDICTION NOTWITHSTANDING THE FAILURE OF A PARTY DULY NOTIFIED OF THE ARBITRATION HEARING TO APPEAR THEREAT.

22.2 BUYER'S RESORT TO OR PARTICIPATION IN SUCH ARBITRATION PROCEEDINGS SHALL NOT BAR SUIT IN A COURT OF COMPETENT JURISDICTION BY THE BUYER FOR DAMAGES AND/OR SPECIFIC PERFORMANCE UNLESS AND UNTIL THE ARBITRATION RESULTS IN AN AWARD TO THE SELLER OF LIQUIDATED DAMAGES, IN WHICH EVENT SUCH AWARD SHALL ACT AS A BAR AGAINST ANY ACTION BY BUYER FOR DAMAGES AND/OR SPECIFIC PERFORMANCE.

22.3 NOTICE: BY INITIALING IN THE SPACE BELOW YOU ARE AGREEING TO HAVE ANY DISPUTE ARISING OUT OF THE MATTERS INCLUDED IN THE "ARBITRATION OF DISPUTES" PROVISION DECIDED BY NEUTRAL ARBITRATION AS PROVIDED BY CALIFORNIA LAW AND YOU ARE GIVING UP ANY RIGHTS YOU MIGHT POSSESS TO HAVE THE DISPUTE LITIGATED IN A COURT OR JURY TRIAL. BY INITIALING IN THE SPACE BELOW YOU ARE GIVING UP YOUR JUDICIAL RIGHTS TO DISCOVERY AND APPEAL, UNLESS SUCH RIGHTS ARE SPECIFICALLY INCLUDED IN THE "ARBITRATION OF DISPUTES" PROVISION. IF YOU REFUSE TO SUBMIT TO ARBITRATION AFTER AGREEING TO THIS PROVISION, YOU MAY BE COMPELLED TO ARBITRATE UNDER THE AUTHORITY OF THE CALIFORNIA CODE OF CIVIL PROCEDURE. YOUR AGREEMENT TO THIS ARBITRATION PROVISION IS VOLUNTARY.

WE HAVE READ AND UNDERSTAND THE FOREGOING AND AGREE TO SUBMIT DISPUTES ARISING OUT OF THE MATTERS INCLUDED IN THE "ARBITRATION OF DISPUTES" PROVISION TO NEUTRAL ARBITRATION.

JGR ________ Buyer Initials   JWF ________ Seller Initials

23. Miscellaneous.

23.1 **Binding Effect.** This Agreement shall be binding on the Parties without regard to whether or not paragraphs 21 and 22 are initialed by both of the Parties. Paragraphs 21 and 22 are each incorporated into this Agreement only if initialed by both Parties at the time that the Agreement is executed.

23.2 **Applicable Law.** This Agreement shall be governed by, and paragraph 22.3 is amended to refer to, the laws of the state in which the Property is located.

23.3 **Time of Essence.** Time is of the essence of this Agreement.

23.4 **Counterparts.** This Agreement may be executed by Buyer and Seller in counterparts, each of which shall be deemed an original, and all of which together shall constitute one and the same instrument. Escrow Holder, after verifying that the counterparts are identical except for the signatures, is authorized and instructed to combine the signed signature pages on one of the counterparts, which shall then constitute the Agreement.

23.5 **Waiver of Jury Trial.** **THE PARTIES HEREBY WAIVE THEIR RESPECTIVE RIGHTS TO TRIAL BY JURY IN ANY ACTION OR PROCEEDING INVOLVING THE PROPERTY OR ARISING OUT OF THIS AGREEMENT.**

23.6 **Conflict.** Any conflict between the printed provisions of this Agreement and the typewritten or handwritten provisions shall be controlled by the typewritten or handwritten provisions.

24. Disclosures Regarding The Nature of a Real Estate Agency Relationship.

24.1 The Parties and Brokers agree that their relationship(s) shall be governed by the principles set forth in the applicable sections of the California Civil Code, as summarized in paragraph 24.2.

24.2 When entering into a discussion with a real estate agent regarding a real estate transaction, a Buyer or Seller should from the outset understand what type of agency relationship or representation it has with the agent or agents in the transaction. Buyer and Seller acknowledge being advised by the Brokers in this transaction, as follows;

(a) *Seller's Agent.* A Seller's agent under a listing agreement with the Seller acts as the agent for the Seller only. A Seller's agent or subagent has the following affirmative obligations: (1) *To the Seller:* A fiduciary duty of utmost care, integrity, honesty, and loyalty in dealings with the Seller. (2) *To the Buyer and the Seller:* a. Diligent exercise of reasonable skills and care in performance of the agent's duties. b. A duty of honest and fair dealing and good faith. c. A duty to disclose all facts known to the agent materially affecting the value or desirability of the property that are not known to, or within the diligent attention and observation of, the Parties. An agent is not obligated to reveal to either Party any confidential information obtained from the other Party which does not involve the affirmative duties set forth above.

(b) *Buyer's Agent.* A selling agent can, with a Buyer's consent, agree to act as agent for the Buyer only. In these situations, the agent is not the Seller's agent, even if by agreement the agent may receive compensation for services rendered, either in full or in part from the Seller. An agent acting only for a Buyer has the following affirmative obligations. (1) *To the Buyer:* A fiduciary duty of utmost care, integrity, honesty, and loyalty in dealings with the Buyer. (2) *To the Buyer and the Seller:* a. Diligent exercise of reasonable skills and care in performance of the agent's duties. b. A duty of honest and fair dealing and good faith. c. A duty to disclose all facts known to the agent materially affecting the value or desirability of the property that are not known to, or within the diligent attention and observation of, the Parties. An agent is not obligated to reveal to either Party any confidential information obtained from the other Party which does not involve the affirmative duties set forth above.

(c) *Agent Representing Both Seller and Buyer.* A real estate agent, either acting directly or through one or more associate licenses, can legally be the agent of both the Seller and the Buyer in a transaction, but only with the knowledge and consent of both the Seller and the Buyer. (1) In a dual agency situation, the agent has the following affirmative obligations to both the Seller and the Buyer: a. A fiduciary duty of utmost care, integrity, honesty and loyalty in the dealings with either Seller or the Buyer. b. Other duties to the Seller and the Buyer as stated above in their respective sections (a) or (b) of this paragraph 24.2. (2) In representing both Seller and Buyer, the agent may not without the express permission of the respective Party, disclose to the other Party that the Seller will accept a price less than the listing price or that the Buyer will pay a price greater than the price offered. (3) The above duties of the agent in a real estate transaction do not relieve a Seller or Buyer from the responsibility to protect their own interests. Buyer and Seller should carefully read all agreements to assure that they adequately express their understanding of the transaction. A real estate agent is a person qualified to advise about real estate. If legal or tax advice is desired, consult a competent professional.

(d) *Further Disclosures.* Throughout this transaction Buyer and Seller may receive more than one disclosure, depending upon the number of agents assisting in the transaction. Buyer and Seller should each read its contents each time it is presented, considering the relationship between them and the real estate agent in this transaction and that disclosure. Brokers have no responsibility with respect to any default or breach hereof by either Party. The liability (including court costs and attorneys' fees), of any Broker with respect to any breach of duty, error or omission relating to this Agreement shall not exceed the fee received by such Broker pursuant to this Agreement; provided, however, that the foregoing limitation on each Broker's liability shall not be applicable to any gross negligence or willful misconduct of such Broker.

24.3 *Confidential Information:* Buyer and Seller agree to identify to Brokers as "Confidential" any communication or information given Brokers that is considered by such Party to be confidential.

25. Construction of Agreement. In construing this Agreement, all headings and titles are for the convenience of the parties only and shall not be considered a part of this Agreement. Whenever required by the context, the singular shall include the plural and vice versa. Unless otherwise specifically indicated to the contrary, the word "days" as used in this Agreement shall mean and refer to calendar days. This Agreement shall not be construed as if prepared by one of the parties, but rather according to its fair meaning as a whole, as if both parties had prepared it.

JWF ________ Initials   JGR ________ Initials

26 Additional Provisions:

Additional provisions of this offer, if any, are as follows or are attached hereto by an addendum consisting of paragraphs A through F. (If there are no additional provisions write "NONE".)

ATTENTION: NO REPRESENTATION OR RECOMMENDATION IS MADE BY THE AMERICAN INDUSTRIAL REAL ESTATE ASSOCIATION OR BY ANY BROKER AS TO THE LEGAL SUFFICIENCY, LEGAL EFFECT, OR TAX CONSEQUENCES OF THIS AGREEMENT OR THE TRANSACTION TO WHICH IT RELATES. THE PARTIES ARE URGED TO:

1. SEEK ADVICE OF COUNSEL AS TO THE LEGAL AND TAX CONSEQUENCES OF THIS AGREEMENT.
2. RETAIN APPROPRIATE CONSULTANTS TO REVIEW AND INVESTIGATE THE CONDITION OF THE PROPERTY. SAID INVESTIGATION SHOULD INCLUDE BUT NOT BE LIMITED TO: THE POSSIBLE PRESENCE OF HAZARDOUS SUBSTANCES, THE ZONING OF THE PROPERTY, THE INTEGRITY AND CONDITION OF ANY STRUCTURES AND OPERATING SYSTEMS, AND THE SUITABILITY OF THE PROPERTY FOR BUYER'S INTENDED USE.

WARNING: IF THE PROPERTY IS LOCATED IN A STATE OTHER THAN CALIFORNIA, CERTAIN PROVISIONS OF THIS AGREEMENT MAY NEED TO BE REVISED TO COMPLY WITH THE LAWS OF THE STATE IN WHICH THE PROPERTY IS LOCATED.

NOTE:
1. THIS FORM IS NOT FOR USE IN CONNECTION WITH THE SALE OF RESIDENTIAL PROPERTY.
2. IF THE BUYER IS A CORPORATION, IT IS RECOMMENDED THAT THIS AGREEMENT BE SIGNED BY TWO CORPORATE OFFICERS.

The undersigned Buyer offers and agrees to buy the Property on the terms and conditions stated and acknowledges receipt of a copy hereof.

BROKER:

Attn.
Title.
Address:
Telephone:
Facsimile:
Federal ID No.

BUYER:
JOSE RAMIREZ AND/OR ASSIGNEE

By: Jose Ramirez
Date: 1-25-02
Name Printed: Jose Ramirez
Title: Owner
Telephone/Facsimile

By:
Date:
Name Printed:
Title:
Personal Matters / Ex. 6
Telephone/Facsimile: 323.377.8394 / 323.584.[illegible]
Federal ID No.

27 Acceptance.

27.1 Seller accepts the foregoing offer to purchase the Property and hereby agrees to sell the Property to Buyer on the terms and conditions therein specified.

27.2 Seller acknowledges that Brokers have been retained to locate a Buyer and are the procuring cause of the purchase and sale of the Property set forth in this Agreement. In consideration of real estate brokerage service rendered by Brokers, Seller agrees to pay Brokers a real estate Brokerage Fee in a sum equal to 5 % of the Purchase Price divided in such shares as said Brokers shall direct in writing. This Agreement shall serve as an irrevocable instruction to Escrow Holder to pay such Brokerage Fee to Brokers out of the proceeds accruing to the account of Seller at the Closing.

27.3 Seller acknowledges receipt of a copy hereof and authorizes Brokers to deliver a signed copy to Buyer.

NOTE: A PROPERTY INFORMATION SHEET IS REQUIRED TO BE DELIVERED TO BUYER BY SELLER UNDER THIS AGREEMENT

BROKER:
COLLIERS SEELEY INTERNATIONAL, INC.

Attn: Scott A. Meaton, SIOR / Ken Coward
Title: Sr. Vice President / Associate V. P.
Address: 5801 East Slauson Avenue, Suite 150
Commerce, California 90040
Telephone: 323.278.3118 / 323.278.3130
Facsimile: 323.726.1942
Federal ID No.

SELLER:
JERVIS B. WEBB OF CALIFORNIA

By
Date: Jan 25, 2002
Name Printed: Michael Scott Finley
Title: Public Counsel
Telephone/Facsimile: 248.553.1000 / 248.55[illegible]

By:
Date:
Name Printed:

Initials

Initials

Title. _____

Address 3475 West Twelve Mile Road

Farmington Mills, MI 48331

Telephone/Facsimile 248.553.1000 / 248.553.1244

Federal ID No _____

These forms are often modified to meet changing requirements of law and needs of the industry. Always write or call to make sure you are utilizing the most current form: American Industrial Real Estate Association, 700 South Flower Street, Suite 600, Los Angeles, CA 90017. (213) 687-8777.

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Initials

Initials

ADDENDUM TO
STANDARD OFFER, AGREEMENT AND ESCROW INSTRUCTIONS FOR PURCHASE OF REAL ESTATE
FOR PROPERTY LOCATED AT
5030 FIRESTONE BOULEVARD, SOUTH GATE, CALIFORNIA
DATED JANUARY 25, 20002

This Addendum is attached to, and a part of the Standard Offer, Agreement and Escrow Instructions for Purchase of Real Estate, dated January 25, 2002, between Jose Ramirez and/or Assignee, as Buyer, and Jervis B. Webb of California as Seller. For convenience, all capitalized terms not otherwise defined in this Addendum have the same meaning ascribed to them in the Agreement. Furthermore, paragraph references used in this Addendum correspond to the paragraphs set forth in the Agreement.

A. Within five (5) business days from Date of Agreement, Seller shall make the following available for Buyer's review at Colliers-Seeley Commerce office.

1. Survey(s) of the Property in possession of the Seller.

2. Copy of any environmental reports performed on the Property in possession of the Seller, including soil closure report dated October 3, 2001, submitted to the California Regional Water Quality Control Board.

3. Copy of any soil/GEO Technical Report performed on the Property in possession of Seller.

B. **(New) 9.1(g). Feasibility Deadline.**
Notwithstanding any other provision of the Agreement to the contrary, Buyer's time for reviewing all of the matters set forth in paragraph 9 shall expire at fourteen (14) days from the Opening of Escrow.

C. Buyer acknowledges that the Property is currently in escrow with another purchaser (the "Current Escrow"). Buyer and Seller agree that this Agreement will become effective upon the termination of the Current Escrow, when and only if the Current Escrow is terminated. If the Current Escrow is not terminated and proceeds to closing, this agreement shall have no effect and become void.

D. **As Is.**
Notwithstanding anything else in this Agreement, Buyer does hereby acknowledge, represent, warrant and agree, to and with Seller, that (i) Buyer is purchasing the Property in an "AS-IS" condition as of the date of the Close of Escrow with respect to any facts, circumstances, defects, and conditions, including environmental conditions, (ii) Buyer shall undertake all such physical inspections and examinations of the Property as Buyer deems necessary or appropriate, and that Buyer is and will be relying strictly and solely upon such inspections and examinations and the advice and counsel of its own agents and officers, and (iii) Seller is not making, and has not made, any warranty or representation with respect to all or any part of the Property (including, but not limited to, any matters contained in documents made available or delivered to Buyer in connection with this Agreement).

E. **Release and Indemnity**
As of the Close of Escrow Buyer hereby expressly and unconditionally waives, releases, defends, indemnifies and holds harmless Seller and its successors and assigns, and its and their respective affiliates, officers, directors, shareholders, agents, attorneys and employees (collectively "Seller Released Parties") from any and all claims against Seller and/or the Seller Released Parties. Buyer acknowledges and agrees that the foregoing waiver, release and indemnity includes all rights and claims against Seller or Seller Released Parties pertaining to the condition of the Property, whether heretofore or now existing or hereafter arising, or which could, might or may be claimed to exist, or whatever kind or nature, whether known or unknown, suspected, or unsuspected, liquidated or unliquidated, each as though fully set forth herein at length, which in any way arise out of, or are connected with, re relate to, the condition of the Property. The provisions of this Paragraph shall survive the Closing. California Civil Code §1542 provides as follows:

> A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM MUST HAVE MATERIALLY AFFECTED HIS SETTLEMENT WITH THE DEBTOR.

Initials JGR

Initials

By initialing this Paragraph, Buyer acknowledges that it has read, is familiar with, and waives the provisions of California Civil Code §1542 set forth above, and agrees to all of the provisions of this Paragraph.

JGR
Buyer's Initials

F. **Access.**

Buyer and Seller acknowledge that there are three groundwater monitoring wells on the Property and that their continued monitoring remains the responsibility of Seller (the "Wells"). Buyer agrees for itself and its successors or assigns that it shall not permit any damage to the Wells and shall maintain unfettered access to the Wells until such time as no further sampling is required. Buyer grants an irrevocable license to Seller or Seller's designee to enter onto the Property to conduct sampling of the Wells or perform any other groundwater related actions during the normal course of business.

Initials
JGR

Initials

Californi Regional Water Qualit Control Board

Los Angeles Region

Over 50 Years Serving Coastal Los Angeles and Ventura Counties

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

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

January 23, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

NO FURTHER ACTION FOR SOIL ASSESSMENT AND CLEANUP FOR INDUSTRIAL WASTE CLARIFIER, SUMPS T1 AND T2 AND ANODIZING AREA AT JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD AND 9301 RAYO AVENUE, SOUTH GATE (SLIC NO. 744)

Dear Mr.Farley:

Thank you for the Closure Report, dated October 4, 2001, and subsequent Soil Removal Activities Report dated December 17, 2001, for the site, prepared by IT Corporation. Multiple Phases of soil and groundwater investigation and remedial activities were conducted at the site to characterize and cleanup the sources of total recoverable petroleum hydrocarbons (TRPH), volatile organic compounds (VOCs) and metals contamination. The sources of contamination included the industrial waste clarifier, sumps T1 and T2, and anodizing areas. Soil analytical testing results indicated non-detect to 270,000 µg/Kg of trichloroethylene (TCE), non-detect to 140,000 µg/Kg of perchloroethylene (PCE), non-detect to 52 µg/Kg of 1,1-dichloroethane (1,1-DCA), non-detect to 300 µg/Kg of 1,1,1-trichloroethane (1,1,1-TCA), non-detect to 280 mg/Kg of TRPH, non-detect to 5 µg/Kg of benzene, non-detect to 12 µg/Kg of toluene, non-detect to 140 µg/Kg of TRPH C5-C10, non-detect to 6,900 mg/Kg of TRPH C10-C20, non-detect to 29,000 mg/Kg of TRPH C20-C30, non-detect to 360 mg/Kg of antimony, non-detect to 26 mg/Kg of arsenic, 2,700 mg/Kg of barium, non-detect to 8.3 mg/Kg of cadmium, 7,300 mg/Kg of chromium, non-detect to 0.88 mg/Kg of hexavalent chromium, non-detect to 31,000 mg/Kg of lead, and non-detect to 2.5 mg/Kg of mercury. Approximately 39 cubic yards of impacted soil were excavated from the site. A soil vapor extraction system was operated at the site. Confirmation soil analytical testing results and residual contaminant concentrations indicate a maximum of 67 µg/Kg of TCE, 39 µg/Kg of PCE, 1,800 mg/Kg of TRPH C20-C30, 16,000 mg/Kg of TRPH C20-C30, 7.9 mg/Kg of arsenic, 170 mg/Kg of Barium, 0.6 mg/Kg of cadmium, 74 mg/Kg of chromium, 0.24 mg/Kg of hexavalent chromium, 25 mg/Kg of lead, and 2.5 mg/Kg of mercury.

Groundwater is encountered at approximately 42 feet below ground surface. The groundwater beneath the site is impacted with VOCs and metals. The groundwater contamination consists of 77 µg/L of Benzene, 140 µg/L of Toluene, 240 µg/L of 1,1-DCA, 220 µg/L of 1,1-DCE, 65 µg/L of 1,2-DCA, 450 µg/L of cis 1,2-DCE, 45 µg/L of trans 1,2-DCE, 190 µg/L of PCE, 35,000 µg/L of TCE, 8.4 µg/L of MEK, 490 µg/L of Acetone, 320 µg/L of arsenic and 1,100 µg/L of molybdenum.

Based upon the information submitted, the Regional Board has no further requirements with respect to soils at the site. The residual levels of TRPH, metals, and VOCs, with the exception of minor isolated elevated concentrations, detected in the vadose zone at the site are below the site specific cleanup levels established by the Regional Board's 1996 Interim Site Assessment and Cleanup Guidebook, "Designated

Level Methodology", date October 1986 and updated June 1989 for groundwater resource protection, and the U.S. EPA Region IX preliminary remediation goals (PRG) levels for human health protection. The residual elevated concentrations of TRPH, metals and VOCs are localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

This determination of no further action for soil only, is based on available information and the provision that the information provided to this agency was accurate and representative of site conditions. Please contact the Regional Board immediately, if additional soil contamination is discovered during any future development activities.

However, based on the existing groundwater contamination on-site, we are requiring groundwater monitoring for all wells (MW-1 to MW-5). In addition, the Regional Board may require additional groundwater assessment pending our review of any off-site soil and groundwater assessment data and/or potential sources. We are also providing you the opportunity to present any additional data that may suggest that there is other contributing groundwater contaminant sources off-site.

Please contact Dr. Rebecca Chou at (213) 576-6733 or Mr. Steven Hariri at (213) 576-6745, if you have any questions regarding this matter.

Sincerely,

Dennis A. Dickerson
Executive Officer

cc: Robert Sams, Legal Council, State Water Resources Control Board
Gene Lucero, Latham & Watkins
Gary Cronk, IT Corporation
Mr. Jeff Palmer and Ms. Nikki Reagan, Reliable Steel

JAN-23-2002 08:32 FROM:CRWQB LAR 2135766717 TO:213 891 7533 P.003/003

State of California
Environmental Protection Agency

CASE REVIEW FORM

Los Angeles Regional
Water Quality Control Board

Case Reviewer: Steven Hariri	Unit Chief: Rebecca Chou	Section Chief: Arthur Heath	Division Chief:	ADP:	EO: Dennis Dickerson

Date: January 7, 2002	SLIC file no.: 744	Case reviewer: Steven Hariri Signature:

Site Name/Address:	Responsible parties:	Address:	Phone no.:
Jervis B. Webb **5030 Firestone Boulevard** **South Gate, CA 90280**	**Jervis B. Webb**	**34375 West Twelve Mile Road** **Farmington Hills, MI 48331-5624**	**(248) 553-1000**

I. CASE INFORMATION

Area of Concern	Contaminant Source	Chemicals of Concern	Source Status	Date of Action
Site	Rivet Manufacturing (leaking clarifier) and Conveyor Facility (USTs and Piping)	Chlorinated Solvents, Petroleum Hydrocarbons and Metals	UST Removal and Excavation, Soil Vapor Extraction and Reaming Out of Residual Contamination	10/18/96 and 3/16/00 to 12/14/01

II. SITE CHARACTERIZATION INFORMATION

GW Basin: Central Basin	Beneficial uses: MUN, IND, PROC, AGR	Depth to drinking water aquifer: Based on the closest groundwater monitoring well located 1,200 feet northwest, the first drinking water aquifer encountered is located at approximately 500 feet below ground surface.	
Distance to nearest municipal supply well: 1,200 feet		Distance between known shallow GW contamination and drinking water aquifer: 460 feet	
GW highest depth: 42 ft	GW lowest depth: 46 ft	Well screen interval: 40 - 70	Flow direction: Regional to the South
Soil types: Clay, silt and sand.	Max soil depth sampled: 53.5 ft	AB681 Notification: _X_yes ___no The responsible party is the owner.	Adjacent to school: ___yes __X_no

III. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS IN SOIL

Contaminant	Soil (mg/kg)		PRGs		Soil Screening Level (mg/kg)	Contaminant	Soil (mg/kg)		PRGs		Soil Screening Level (mg/kg)
	Farthest (1996-1999)	Latest (2001)	Residential (mg/kg)	Industrial (mg/kg)			Farthest (1996-1999)	Latest (2001)	Residential (mg/kg)	Industrial (mg/kg)	
TCE	270	0.067	2.8	6.1	0.045[a]	Beryllium	<0.54	0.57	150	2,200	4[l]
PCE	140	0.039	5.7	19	0.045[b]	Cadmium	8.3	0.6	9	810	5[m]
1,1-DCA	0.052	<0.001	3.3	7.1	0.011[c]	Chromium	7,300	74	210	450	50[n]
1,1,1-TCA	0.300	<0.001	630	1,400	0.200[d]	Chromium VI	0.88	0.24	0.2	64	50[n]
TRPH	280	N/T	N/A	N/A	10,000[e]	Cobalt	150	14	4,700	100,000	4,700[o]
Benzene	0.005	<0.001	0.65	1.5	0.011[f]	Copper	850	5.3	2,900	76,000	1,300[p]
Toluene	0.012	<0.001	520	520	0.3[g]	Lead	31,000	25	400	750	15[q]
TPH (C5-C10)	0.14	<0.1	N/A	N/A	500[h]	Mercury	1.7	2.5	23	610	2[r]
TPH (C10-20)	6,900	1,800	N/A	N/A	1,000[i]	Molybdenum	140	<1	390	10,000	390[s]
TPH (C20-30)	29,000	16,000	N/A	N/A	10,000[j]	Nickel	72	16	150	41,000	100[t]
Antimony	360	<2	31	820	6[k]	Vanadium	50	50	550	14,000	550[u]
Arsenic	26	7.9	0.39	2.7	50[l]	Zinc	1,200	73	23,000	100,000	5,000[v]
Barium	2,700	170	5,400	100,000	1,000[m]						

N/T – Not tested
N/A – Not applicable

a. Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 15 feet above groundwater.
b. Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 15 feet above groundwater.
c. Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 10 feet above groundwater.
d. Soil screening levels based on a groundwater depth of 40 feet and sand, silt and clay soil matrix with a distance of 0 feet above groundwater.
e. Soil screening levels based on a groundwater depth of 40 feet for C23 – C32.
f. Soil screening levels based on a groundwater depth of 40 feet and sand soil matrix with a distance of 20 feet above groundwater.
g. Soil screening levels based on a groundwater depth of 40 feet and sand soil matrix with a distance of 20 feet above groundwater.
h. Soil screening levels based on a groundwater depth of 40 feet with a distance of 20 feet above groundwater.
i. Cleanup level determination for notes i to n, p to r, t, and v were based on the Regional Board's "Designated Level Methodology", dated October 1986 and updated June 1989. The cleanup level is based on the natural attenuation factor of 100 used for silt, sand and clay with shallow groundwater depth (40 bgs) and a leachability factor of 10 multiplied by the maximum contaminant level of Antimony in groundwater of 0.006 mg/L.

j. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Arsenic in groundwater of 0.05 mg/L.
k. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Barium in groundwater of 1 mg/L.
l. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Beryllium in groundwater of 0.004 mg/L.
m. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Cadmium in groundwater of 0.005 mg/L.
n. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Chromium in groundwater of 0.05 mg/L.
o. The cleanup level is based on the US EPA PRG Residential limit of 4,700 mg/Kg
p. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Copper in groundwater of 1.3 mg/L.
q. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Lead in groundwater of 0.015 mg/L.
r. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Mercury in groundwater of 0.002 mg/L.
s. The cleanup level is based on the US EPA PRG Residential limit of 390 mg/Kg.
t. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the maximum contaminant level of Nickel in groundwater of 0.1 mg/L.
u. The cleanup level is based on the US EPA PRG Residential limit of 550 mg/Kg.
v. The cleanup level is based on the natural attenuation factor of 100 and a leachability factor of 10 multiplied by the secondary maximum contaminant level of Zinc in groundwater of 5 mg/L.

IV. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS IN GROUNDWATER

Contaminant	Groundwater (ug/L)		Maximum Contaminant Level (ug/L)	Contaminant	Groundwater (ug/L)		Maximum Contaminant Level (ug/L)
	Earliest (98 to 01)	Latest (2001)			Earliest (98 to 01)	Latest (2001)	
Benzene	77	<125	1	TCE	35,000	31,000	5
Toluene	140	<125	150	MEK	8.4	<500	1,900[a]
Xylenes	1.6	<100	1,750	Acetone	490	<250	610[a]
1,1DCA	240	<125	5	Arsenic	320	320	50
1,1DCE	220	<125	6	Barium	320	320	1000
1,2DCA	65	<125	0.5	Chromium	<10	<10	50
c-1,2-DCE	450	350	6	Chromium VI	<10	<10	50
t-1,2-DCE	45	<125	10	Methylene	1,100	950	180[a]
PCE	190	150	5	Zinc	25	24	5000[b]

a – US EPA Region IX PRGs for Tap Water
b – Secondary MCL

V. SOIL REMEDIATION

Method: Excavation, Soil Vapor Extraction and Reaming Out of Residual Contamination	Duration of remediation: Five Years

VI. GROUNDWATER REMEDIATION

Method: None	Duration of remediation: N/A

VII. FREE PRODUCT:

Was free product encountered? No	Has free product been totally recovered? N/A
When was free product recovery project completed? N/A	

VIII. RECOMMENDED ACTION:

Soil Closure only: Yes	Case Closure: No	Solvent Case? Yes
Additional Action Required (i.e.: additional site assessment, remediation, monitoring): Groundwater Monitoring, Investigation and Remediation		

IX. COMMENTS AND JUSTIFICATION FOR RECOMMENDED ACTION:

Jervis B. Webb properties are located at 5030 Firestone Boulevard and 9301 Rayo Avenue in the City of South Gate, California. The Webb-Firestone property (the site) occupies about 1.4 acres. This site is bounded on the north by Firestone Boulevard and on the south by Reliable Steel, Incorporated. Piazza Trucking (formerly Laidlaw) lie immediately east of the Webb site (See Figure 1). To the west is a 50-foot wide Union Pacific Railroad easement. The Webb-Firestone property includes a 20,000 square foot steel-framed building with corrugated steel siding.

The building is surrounded by asphalt and concrete paving except for a planter on the north side of the building. A five-foot wide rail spur enters the subject property from the northwest and extends across the west side to a 10,000 square foot, steel-framed open bay on the Reliable Steel property to the south. Along the entire western portion of the property is a 35- foot wide Los Angeles County Flood Control easement that contains a large underground storm drain. Another storm drain runs along the north side of the property along Firestone Boulevard. A sanitary sewer pipeline extends across the eastern side of the Webb-Firestone property to another sewer line in Rayo Avenue (south of the Reliable Steel property).

Webb of California manufactured conveyor belt systems at the Rayo property (now the Reliable Steel property) from the middle 1950s to early 1996. The Firestone property was purchased by Webb of California in 1975 from Spear Industries. Blake Rivet Company (Blake), an aircraft rivet manufacturer, which had been leasing the property prior to Webb's purchase, continued to lease the property until approximately 1981. Blake used an above ground anodizer as part of its rivet manufacturing operation. Wastewater from the anodizer was collected in floor trenches where it was directed to a three-staged clarifier made of concrete. The clarifier was located just to the south of the southern wall of the Firestone property building (see Figure 1) until it was removed in November 1996. The clarifier reportedly discharged into the local sewer system. After Blake's departure, Webb of California used the Firestone property primarily for storage of metal stock that was used at the adjacent Webb Rayo conveyor facility until it was purchased by Reliable Steel in 1997.

On October 18, 1996, Jervis Webb completed underground storage tank activities as well as general site cleanup work. The Los Angeles County Department of Public Works issued a certification for tank closure on December 17, 1996. The tanks were described as underground sumps. The concrete bottom of Tank 1 was broken and soil beneath the sump was sampled. Soil analysis did not detect any petroleum hydrocarbons, VOCs or elevated metals. Tank 2 consisted of a three foot diameter open-bottomed steel pipe extending four feet below the floor level, with a man-hole type cover set in the concrete floor of the building. A layer of paint, approximately one to two inches thick was observed on the gravelly fill soil at the base of the structure. Soil sample P-1-2 from the soil at the base of the structure was taken approximately two feet below the paint layer and analyzed for VOCs, petroleum hydrocarbons and metals. The results of the soil sample contained elevated metal for arsenic, cadmium, chromium and lead. Further excavation to a depth of approximately 10 feet below floor level was conducted to further delineate the extent of the contamination. Additional four soil samples from the excavation did not detect elevated metals, total petroleum hydrocarbons or VOCs to a maximum depth of 10 feet bgs. Approximately 35 cubic yards of soil was excavated for the delineation of contamination of Tank 2. The gravelly fill material was observed to continue to the full depth of the excavation, fifteen feet below floor level. The excavations were backfilled with import fill and the excavated soil removed and disposed off-site. On November 18, 1996, Jervis Webb removed oil-stained soil from a section of the unlined utility trench near the vicinity of Tank 2 by the building footing. One cubic yard of soil, approximately one-foot thick extending approximately 15 feet, was removed. Elevated petroleum hydrocarbons were detected in addition to VOCs 1,1-DCA, 1,1,1-TCA, benzene and toluene. Confirmation samples contained no VOCs and petroleum hydrocarbons of middle to heavy distillates in one confirmation sample of 1,800 mg/Kg in the C10-C20 and 16,000 mg/Kg in the C20-C30 hydrocarbon range. After tank closure activities at the site, Jervis Webb sold the southern portion of the site to Reliable Steel and retained the northern portion of the property for further environmental evaluation.

On October 28, 1997, Jervis Webb completed fourteen soil borings at northern portion of the site. Soil borings were sampled to a maximum depth of ten feet below ground surface (bgs) inside and outside the building and to a maximum depth of 20 feet bgs in the vicinity of the clarifier. Soil samples were analyzed for pH, petroleum hydrocarbons, metals and VOCs. Hexavalent chromium was detected in a boring at approximately 10.5 feet bgs with a concentration of 0.88 mg/Kg. No petroleum hydrocarbons were detected. Maximum concentration of VOCs included trichloroethylene of 270 mg/Kg and 140 mg/Kg perchloroethylene beneath the clarifier. On December 1, 1997, a soil gas survey was conducted at the site to identify potential areas of VOC contamination. The data indicated that the primary contaminants were TCE and PCE with maximum concentration of 25 µg/L of TCE and 28 µg/L of PCE. On December 2, 1997, five deep soil borings were completed at the site to determine the vertical extent of VOCs in soil beneath the clarifier and anodizing areas. Soil borings were completed to a maximum depth ranging between 46.5 feet to 62.5 feet bgs. Groundwater was encountered at approximately 57 feet bgs. Elevated concentration of TCE and PCE were detected in the soil samples.

On February 24 and 25, 1998, three groundwater wells were installed at the site and screened from 40 feet to 70 feet bgs. The greatest depth of investigation was 73 feet bgs. The depth to groundwater ranged for approximately 43.5 to 44.8 feet bgs. Maximum concentration of TCE from groundwater monitoring was 25,000 µg/L. PCE, cis and trans 1,2-DCE, 1,1-DCE, 1,1-DCA and toluene were detected. A CPT investigation of the groundwater was conducted on October 1, 1999 at nine locations to further characterize the extent of groundwater impact. Two new groundwater monitoring wells were installed. A maximum concentration of 35,000 µg/L of TCE was detected in groundwater. Other VOCs detected were PCE, cis and trans 1,2-DCE, 1,1-DCA, 1,2-DCA and 1,1-DCE, acetone, benzene, xylenes, toluene and MEK.

On June 1, 1999, the clarifier at the site was excavated, removed and backfilled with 47 cubic yard of clean fill material. Eight vapor wells were installed at the site on June 23, 1999. The monitoring wells and probes were designed and constructed such that they could be converted for use as vapor extraction wells. Four soil vapor extraction (SVE) wells and four vapor monitoring probes were installed. Three of the monitoring probes were later converted to SVE wells by connecting to the SVE vacuum manifold. A total of four shallow SVE wells are screened from 19 to 25 feet, while three deep SVE wells are screened from 30 to 40 feet. The SVE system started operation on March 16, 2000. The system has operated nearly continuously for the past 15 months, except for down periods. Approximately 155 pounds of VOCs had been removed from the soil as of May 2001.

On September 13, 2001, five soil confirmation soil borings were drilled. The soil samples were analyzed for VOCs and metals. Two confirmation borings CB-3 and CB-4 contained elevated TCE concentrations of 290 and 630 µg/Kg, respectively. On December 14, 2001, residual soil contamination to include hexavalent chromium was drilled-out at the site. The borings were drilled using a six-inch diameter auger and subsequently reamed out by a twelve-inch auger. A total of three drill-outs were completed to remove approximately 3 cubic yards of soil. Confirmation soil samples were collected at the bottom of each borehole.

Residual contaminant concentration of petroleum hydrocarbons, metals and VOCs are slightly above acceptable levels. Boring CB-1 contains 35 µg/Kg of TCE at a depth of 20 feet bgs with a cleanup level of 34 µg/Kg, 67 µg/Kg of TCE at 25 feet bgs with a cleanup level of 45 µg/Kg.

Boring CB-3 contains 24 µg/Kg of TCE at a depth of 36 feet with a cleanup level of 6 µg/Kg. The residual contamination is localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

Petroleum hydrocarbons are slightly above acceptable limits. Sample B-1-2 contained 1,800 mg/Kg of C-10 to C-20 range hydrocarbon with a cleanup level of 1,000 mg/Kg and 16,000 mg/Kg of C20 to C-30 range hydrocarbon with a cleanup level of 10,000 mg/Kg. The elevated residual contaminants will attenuate due to the biodegradable nature of petroleum hydrocarbons.

The elevated Antimony concentration of 360 mg/Kg was taken from sample DS-2. DS-2 was primarily dry paint scrapings for waste characterization. The rest of the samples were non-detect for Antimony. Arsenic concentrations at the site vary from non-detect to 7.6 mg/Kg. The elevated arsenic concentration of 26 mg/Kg was taken from sample P-1-2 approximately two feet below the paint layer at the base of the structure Tank 2. The area around and below P-1-2 was excavated. No other elevated concentrations of arsenic were detected at the site. The distribution of arsenic concentration reflects background concentrations. The elevated Barium concentration of 2,700 mg/Kg was taken from sample DS-2. The next highest concentration of Barium was 170 mg/Kg in boring CB-1 at 25 feet bgs. Cadmium concentration in sample P-1-2 was 8.3 mg/Kg. The next highest concentration of cadmium detected was detected in DS-2 of 2.3 mg/Kg and 0.6 mg/Kg in boring CB-1 at 25 feet bgs. The elevated Chromium concentration of 7,300 mg/Kg was taken from sample DS-2. The next highest chromium concentration was detected in P-1-2 of 350 mg/Kg, SP-1-E and SP-1-W of 97 mg/Kg, SP-2-N and SP-2-S of 85 mg/Kg and boring B6 at six feet bgs of 74 mg/Kg. The elevated concentrations of chromium in the stockpile samples SP-1-E, SP-1-W, SP-2-N and SP-2-S are not representative of the rest of concentrations detected at the site, with the exception of 74 mg/Kg at B6 at five feet. All the other detected chromium concentrations are below the cleanup level of 50 mg/Kg. The elevated lead concentration of 31,000 mg/Kg was taken from sample DS-2. The next highest sample was obtained from P-1-2 of 1,600 mg/Kg, SP-2-N and SP-2-S of 25 mg/Kg and SP-1 of 17 mg/Kg. The elevated concentrations of lead in the stockpile samples SP-2-N and SP-2-S, and SP-1 are not representative of the rest of concentrations detected at the site. All other lead levels are below the cleanup level of 15 mg/Kg for lead. The elevated mercury concentration was encountered in boring CB-1 at 30 feet bgs with a cleanup level of 2 mg/Kg. All the other detected Mercury concentrations are below the cleanup level of 2 mg/Kg. Boring CB-1A contains 0.24 mg/Kg of hexavalent chromium with a cleanup level of 0.2 mg/Kg. The residual contamination mentioned above is localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

All other soil analysis at the site were non-detect or below acceptable levels based on the U.S. EPA PRG levels for human health protection and Regional Board's Interim Site Assessment & Cleanup Guidebook (site specific cleanup goals for groundwater protection). Based upon the information submitted, the site does not have a soil source for the VOCs detected in the groundwater at this time. The metal cleanup level determination was based on the Regional Board's "Designated Level Methodology", date October 1986 and updated June 1989. The cleanup level is based on the natural attenuation factor of 10 used for silt, sand, and clay with shallow groundwater depth and a leachability factor of 100 multiplied by the maximum contaminant level (or secondary maximum contaminant level) of each metal. Based on the submitted data, staff submits Jervis Webb's recommendation of no further action for soil at the subject site, with groundwater monitoring, investigation and remediation is appropriate at this time.

California Regional Water Quality Control Board
Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

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Gray Davis
Governor

December 12, 2001

Mr. Gene Lucero
Latham & Watkins
633 West Fifth Street, Suite 4000
Los Angeles, CA 90071-2007

JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Lucero:

Thank you for your October 29, 2001 letter to the Los Angeles Regional Water Quality Control Board (Regional Board) regarding the Jervis Webb site. Your letter sought soil closure for the sale of the Jervis Webb property. A follow-up letter, dated November 29, 2001, requested additional assistance on the soil closure.

Regional Board staff have reviewed the Soil Closure Report submitted on October 4, 2001. In order to evaluate your site for soil closure, please address the elevated values of hexavalent chromium and trichloroethylene (TCE) at the site. Boring B4 contains 0.88 milligrams per kilogram (mg/g) of hexavalent chromium at a depth of 10.5 feet below groundsurface (bgs). Confirmation boring CB-3 contains 290 micrograms per kilogram (µg/kg) and 24 µg/kg of trichloroethylene (TCE) at a depth of 25 feet bgs and 30 feet bgs, respectively. Confirmation boring CB-4 contains 93 µg/kg at a depth of 25 feet bgs and 660 µg/kg of TCE at 30 feet bgs. The residual contamination at the site is not protective of groundwater quality or human health as determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, and the preliminary remedial goals (PRGs) soil screening levels prepared by the United States Environmental Protection Agency, Region IX. The removal or further remediation of the residual contamination at the site will be required before soil closure is considered.

We look forward to working with you towards regulatory site soil closure. Please call me at (213) 576-6605, or the Project Manager Steven Hariri at (213) 576-6745, if you have any questions.

Sincerely,

Dennis Dickerson
Executive Officer

cc: Mr. Michael Farley, Jervis B. Webb Company
Gary Cronk, IT Corporation

California Re 'onal Water Quality C ntrol Board

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January 23, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

NO FURTHER ACTION FOR SOIL ASSESSMENT AND CLEANUP FOR INDUSTRIAL WASTE CLARIFIER, SUMPS T1 AND T2 AND ANODIZING AREA AT JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD AND 9301 RAYO AVENUE, SOUTH GATE (SLIC NO. 744)

Dear Mr.Farley:

Thank you for the Closure Report, dated October 4, 2001, and subsequent Soil Removal Activities Report dated December 17, 2001, for the site, prepared by IT Corporation. Multiple Phases of soil and groundwater investigation and remedial activities were conducted at the site to characterize and cleanup the sources of total recoverable petroleum hydrocarbons (TRPH), volatile organic compounds (VOCs) and metals contamination. The sources of contamination included the industrial waste clarifier, sumps T1 and T2, and anodizing areas. Soil analytical testing results indicated non-detect to 270,000 µg/Kg of trichloroethylene (TCE), non-detect to 140,000 µg/Kg of perchloroethylene (PCE), non-detect to 52 µg/Kg of 1,1-dichloroethane (1,1-DCA), non-detect to 300 µg/Kg of 1,1,1-trichloroethane (1,1,1-TCA), non-detect to 280 mg/Kg of TRPH, non-detect to 5 µg/Kg of benzene, non-detect to 12 µg/Kg of toluene, non-detect to 140 µg/Kg of TRPH C5-C10, non-detect to 6,900 mg/Kg of TRPH C10-C20, non-detect to 29,000 mg/Kg of TRPH C20-C30, non-detect to 360 mg/Kg of antimony, non-detect to 26 mg/Kg of arsenic, 2,700 mg/Kg of barium, non-detect to 8.3 mg/Kg of cadmium, 7,300 mg/Kg of chromium, non-detect to 0.88 mg/Kg of hexavalent chromium, non-detect to 31,000 mg/Kg of lead, and non-detect to 2.5 mg/Kg of mercury. Approximately 39 cubic yards of impacted soil were excavated from the site. A soil vapor extraction system was operated at the site. Confirmation soil analytical testing results and residual contaminant concentrations indicate a maximum of 67 µg/Kg of TCE, 39 µg/Kg of PCE, 1,800 mg/Kg of TRPH C20-C30, 16,000 mg/Kg of TRPH C20-C30, 7.9 mg/Kg of arsenic, 170 mg/Kg of Barium, 0.6 mg/Kg of cadmium, 74 mg/Kg of chromium, 0.24 mg/Kg of hexavalent chromium, 25 mg/Kg of lead, and 2.5 mg/Kg of mercury.

Groundwater is encountered at approximately 42 feet below ground surface. The groundwater beneath the site is impacted with VOCs and metals. The groundwater contamination consists of 77 µg/L of Benzene, 140 µg/L of Toluene, 240 µg/L of 1,1-DCA, 220 µg/L of 1,1-DCE, 65 µg/L of 1,2-DCA, 450 µg/L of cis 1,2-DCE, 45 µg/L of trans 1,2-DCE, 190 µg/L of PCE, 35,000 µg/L of TCE, 8.4 µg/L of MEK, 490 µg/L of Acetone, 320 µg/L of arsenic and 1,100 µg/L of molybdenum.

Based upon the information submitted, the Regional Board has no further requirements with respect to soils at the site. The residual levels of TRPH, metals, and VOCs, with the exception of minor isolated elevated concentrations, detected in the vadose zone at the site are below the site specific cleanup levels established by the Regional Board's 1996 Interim Site Assessment and Cleanup Guidebook, "Designated

Level Methodology", date October 1986 and updated June 1989 for groundwater resource protection, and the U.S. EPA Region IX preliminary remediation goals (PRG) levels for human health protection. The residual elevated concentrations of TRPH, metals and VOCs are localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

This determination of no further action for soil only, is based on available information and the provision that the information provided to this agency was accurate and representative of site conditions. Please contact the Regional Board immediately, if additional soil contamination is discovered during any future development activities.

However, based on the existing groundwater contamination on-site, we are requiring groundwater monitoring for all wells (MW-1 to MW-5). In addition, the Regional Board may require additional groundwater assessment pending our review of any off-site soil and groundwater assessment data and/or potential sources. We are also providing you the opportunity to present any additional data that may suggest that there is other contributing groundwater contaminant sources off-site.

Please contact Dr. Rebecca Chou at (213) 576-6733 or Mr. Steven Hariri at (213) 576-6745, if you have any questions regarding this matter.

Sincerely,

Dennis A. Dickerson
Executive Officer

cc: Robert Sams, Legal Council, State Water Resources Control Board
Gene Lucero, Latham & Watkins
Gary Cronk, IT Corporation
Mr. Jeff Palmer and Ms. Nikki Reagan, Reliable Steel

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March 14, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

REQUEST TO MODIFY GROUNDWATER SAMPLING METHODOLOGY AND SEMI-ANNUAL GROUNDWATER MONITORING REPORT– JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the "Request to Modify Groundwater Sampling Methodology and Semi-annual Groundwater Monitoring Report", dated February 28, 2002. Based on our review of the information submitted, we have the following comments:

1. You are authorized to perform semi-annual groundwater monitoring for volatile organic compounds (VOCs) and metals by passive diffusive bag (PDB) sampling. Please suspend the PDBs near the bottom of each groundwater monitoring well.

2. Please correct the Maximum Contaminant Levels (MCL) of chromium to 50 micrograms per liter (ug/l) and barium to 1,000 ug/l in Table 3 of the groundwater monitoring report.

3. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.

4. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.

Please call me at (213) 576-6745, if you have any questions.

Sincerely,

S. Steven Hariri, PE
Water Resources Control Engineer - D
Site Cleanup III Unit

cc: Gary Cronk, IT Corporation

California Environmental Protection Agency

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

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California Regional Water Quality Control Board

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Internet Address: http://www.swrcb.ca.gov/rwqcb4

June 28, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 W. Twelve Mile Rd.
Farmington Hills, MI 48331-5624

ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND CLEANUP (SLIC) COST RECOVERY PROGRAM – JERVIS WEBB CO. - 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 0744, PCA# 2042J00)

Dear Mr. Farley:

Section 13304 of the California Water Code (Porter Cologne) allows the Regional Board to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at this site in accordance with our letter dated February 2, 1998. In compliance with Section 13365 of the California Water Code, this letter is being sent to provide you with the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided.
2. A statement of the expected outcome of that work.
3. The billing rates for all individuals and classes of employees expected to engage in the work.
4. An estimate of all expected charges to be billed to you by this agency.

Estimate of Work to be Performed

Board staff estimate that the following work will be performed during the fiscal year 2002/2003 (July 1, 2002 to June 30, 2003):

- Review groundwater monitoring reports, other project technical reports that may be necessary, and other information as appropriate.
- Written correspondences and telephone communications with Jervis B. Webb Company, its representatives and interested third parties.
- Conduct internal communications (i.e. meetings, memos, site status updates, program updates, etc.) regarding the project.
- Meet with Jervis B. Webb Company and its representatives.
- Site inspections and/or collect confirmation samples as appropriate.

Expected Outcome of Work

The following is the expected outcome of work that will be performed during fiscal year 2002/2003:

- Track groundwater results.
- Written comments on technical reports to be submitted as appropriate.
- Verify adequacy of technical reports.
- Conduct meetings and/or additional site inspections to facilitate the completion of the project.

Billing Rates

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is approximately $80.00 per hour.

Estimation of Expected Charges

Board staff expects to charge about 100 hours of work related to this site during fiscal year 2002/2003. Based on the average billing rate of $80.00 per hour, the estimated billing charge for this site during fiscal year 2002/2003 is about $8,000.

If you have any questions, please contact Steven Hariri (213) 576-6745 or J. T. Liu at (213) 576-6667.

Sincerely,

Dennis A. Dickerson
Executive Officer
Los Angeles Regional Water Quality Control Board

Enclosure: Billing Rate Description

cc: Donna Vercruyssen, SWRCB - CWP

IT Corporation
3347 Michelson Drive, Suite 200
Irvine, CA 92612
Telephone: 949-261-6441
Fax: 949-474-8309

December 17, 2001

California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013
ATTN: Steven Hariri

RE: Soil Removal Activities
Jervis B. Webb of California
5030 Firestone Boulevard and 9301 Rayo Avenue
South Gate, CA
SLIC No. 744

Dear Mr. Hariri:

This letter report summarizes the soil removal activities performed by IT Corporation at the Jervis B. Webb of California (Webb) facility on December 14, 2001. In accordance with our Work Plan dated December 12, 2001, which memorialized our conversations and direction from you, we drilled three large diameter borings and removed contaminated soil successfully from each boring at the locations specified by the Board. Pursuant to the Board's direction, a confirmation sample was taken at the bottom of each boring.

Background

IT sampled five confirmation borings (CB-1 to CB-5) at the Webb site on September 13-14, 2001, in order to meet the Los Angeles Regional Water Quality Control Board's (RWQCB) requirements for soil closure. Pursuant to the RWQCB letter response dated December 12, 2001, the Board directed that the elevated levels of TCE in borings CB-3 and CB-4 be removed in order to achieve soil closure. In addition, the RWQCB required the 0.88 mg/kg of hexavalent chromium found previously by EKI in boring B-4 at 10.5 feet be removed.

FIELD WORK

On December 14, 2001, IT drilled three large diameter soil borings, designated CB-3A, CB-4A, and CB-1A, immediately adjacent to confirmation borings CB-3 and CB-4 and EKI Boring B-4, respectively. The borings were drilled using a limited access (low overhead) hollow stem auger rig, since the borings were located inside the Firestone Boulevard building, which has an overhead clearance of about 14 feet. The borings were initially drilled using 6-inch diameter augers and then reamed using 12-inch diameter augers. Boring CB-3A was drilled to a final depth of 36 feet, boring CB-4A to a depth of 37 feet, and boring CB-1A to 18 feet.

Per your request, confirmation soil samples were collected at the bottom of each borehole using a split spoon sampler equipped with brass sleeves. Other confirmation samples were collected to ensure that all elevated levels of TCE and/or hexavalent chromium had been removed from the boring. Samples to be analyzed for VOCs were extracted from the brass sleeve in the field using an Encore™ sampler.

During drilling, the field geologist monitored the headspace of the soil cuttings using a calibrated photo-ionization detector (PID) and logged the readings onto a boring log. The geologist also recorded the relative percentages of sand, silt, and clay, soil color, density, odor, moisture content, and any unusual observations. Copies of the soil boring logs are provided in Appendix A. Upon completion of sampling, the boreholes were backfilled with bentonite chips and saturated with water.

Samples from CB-3A and CB-4A were analyzed for VOCs (EPA Method 8260B) on a 24-hour turnaround by Calscience Environmental Laboratories, Inc., a State-certified laboratory. The sample from CB-1A was analyzed for hexavalent chromium (EPA 7196A) and total chromium (EPA 6010B) on a 24-hour basis. Proper chain of custody procedures were followed.

Laboratory Results

The results of the soil confirmation samples collected from the bottom of each boring are summarized in Table 1. The samples analyzed for VOCs (EPA 8260B) indicated no detectable TCE (< 2 ug/kg) in boring CB-4A at 37 feet and 24 ug/kg of TCE in boring CB-3A at 36 feet. No VOCs other than TCE were detected in either boring.

Hexavalent chromium was found in boring CB-1A at 18 feet depth at a level of 0.24 mg/kg, which is below EPA's Preliminary Remediation Goal (PRG) for industrial soil (64 mg/kg) and residential soil (30 mg/kg) and approximates the California modified PRG (0.20 mg/kg). In addition, a total chromium level of 14.1 mg/kg was detected in this sample. This concentration is much less than the EPA industrial PRG (450 mg/kg) and residential PRG (210 mg/kg) and within the normal background level for total chromium in the soil.

Waste Disposal

The soil cuttings generated by the drilling were contained in 55-gallon drums, labeled, and a drum inventory prepared to identify the contents of each (by footage). A total of 12 drums of soil cuttings were generated by this investigation. The soil is currently being profiled for disposal at a permitted soil disposal facility. The soil will be scheduled for offsite disposal as soon as possible. Documentation of the soil disposal will be provided to the RWQCB under separate cover when the manifests become available.

Request for Soil Closure

Based on the successful removal of soil containing elevated levels of TCE and hexavalent chromium from the three borings of concern, we have completed the last remaining requirement for closure of the site. Therefore, we are requesting soil closure for the Webb site.

Schedule

In accordance with our previous discussion and correspondence, we appreciate the Board's efforts to issue the soil closure letter by Wednesday, December 19, 2001, to meet the requirements of the property transfer.

Please feel free to contact Gary Cronk at 949-660-7511 should you have any questions or comments regarding this report.

Sincerely,
IT Corporation

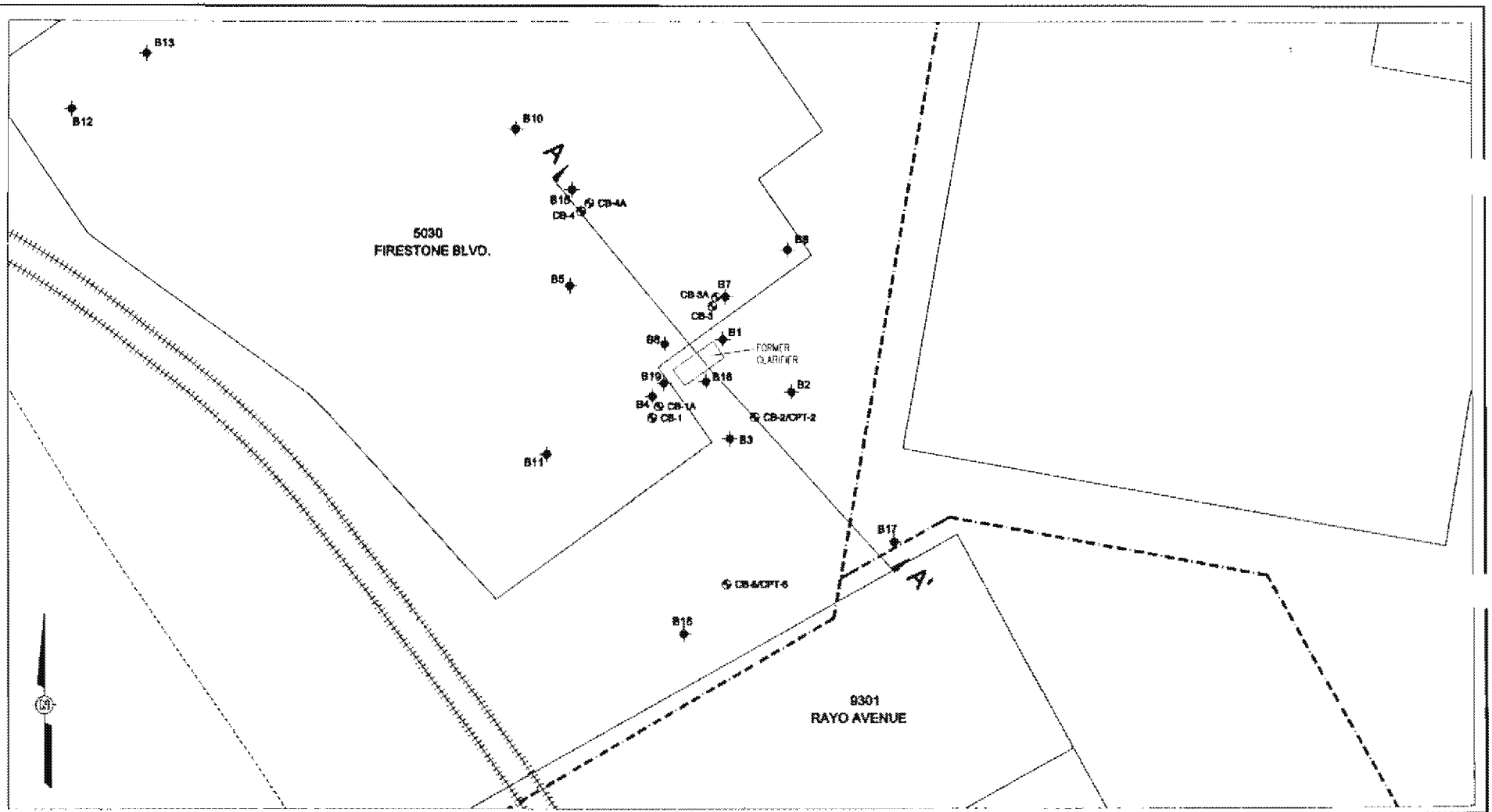
Gary Cronk

Gary Cronk, P.E.
Sr. Project Manager

REGISTERED PROFESSIONAL ENGINEER
GARY D. CRONK
No. C041873
Exp. 03/31/04
CIVIL
STATE OF CALIFORNIA

Enclosures:
Figure 1: Confirmation Soil Boring Locations
Table 1: Summary of Analytical Results
Appendix A: Soil Boring Logs
Appendix B: Laboratory Analytical Reports and Chain of Custody

cc: Dennis Dickerson, RWQCB
Arthur Heath, RWQCB
Rebecca Chow, RWQCB
Mike Farley, Jervis B. Webb
Michael Feeley, Latham & Watkins
Gene Lucero, Latham & Watkins



LEGEND

CB-1 Confirmation Boring Location
B1 Soil Boring Location
A A' Geologic Cross Section Locations
Flood Control District Easement
Property Line
Union Pacific Rail Road

NOTE: All locations are approximate.

APPROXIMATE SCALE
0 40 80 FEET

IT CORPORATION

JERVIS B. WEBB
OF CALIFORNIA

FIGURE 1
CONFIRMATION SOIL BORING LOCATIONS

JERVIS B. WEBB OF CALIFORNIA
5030 FIRESTONE BOULEVARD
SOUTH GATE, CALIFORNIA

DRAWING NUMBER 831461-B3
APPROVED BY
ED BY

Table 1.

Boring No.	Depth (ft)	TCE (ug/kg)	Hexavalent Chromium (mg/kg)	Hex. Chromium Residential Soil PRG (mg/kg)	Total Chromium (mg/kg)	Total Chromium Residential Soil PRG (mg/kg)
CB-3A	36	24	–	–	–	–
CB-4A	37	< 2	--	--	--	--
CB1A	18	–	0.24	0.2*	14 1	210

Footnotes:

TCE = trichloroethylene

PRG = EPA's Preliminary Remediation Goal for Residential Soil

* = California Modified PRG

APPENDIX A

SOIL BORING LOGS

BORING NO. CB-1A

Project Name: Jervis B. Webb
Location: 5030 Firestone Blvd. South Gate, CA
Drill Company: A&R
Driller: Eddie
Rig/Core: Limited Access
Method: HSA
Init. H_2O Level: NA
Static H_2O Level: NA
Total Hole Depth: 19.5'
Borehole Dia.: 8"
Fill Material: Bentonite (#8)
Screen Dia.: NA
Depth Interval: NA
Casing Dia.: NA
Depth Interval: NA
Filter Pack/Depth: NA
Seal/Depth/Type: NA

NOTES:

- Augered through concrete.
- Hand augered to 5' for utility clearance.
- No groundwater encountered.
- Backfilled with bentonite to surface.
- Boring logged by cuttings and samples.

COORDINATES: N Not Surveyed, E Not Surveyed

FIELD GEOLOGIST: B. Tanaka — DATE BEGAN: 12-14-01
EDITED BY: B. Tanaka — DATE FINISHED: 12-14-01
CHECKED BY: P. Dinkmeyer — GROUND SURFACE EL.: Not meas.
R.G. NO.: 4812

DEPTH IN FEET	OVA READING (ppm)	WELL SUMMARY/ BACKFILL	PENETRATION RESISTANCE (BLOWS/6 INCHES) SAMPLE	USCS	PROFILE	DESCRIPTION
0						CONCRETE: 3" thick.
				sm		SILTY SAND (sm): Dark brown, slightly moist, medium dense, very fine grained, micaceous, no odor detected.
5						SILTY SAND (sm): Same as above, slightly moist, no odor detected.
				cl		SILTY CLAY (cl): Yellow brown, moist, soft, very fine grained, micaceous, no odor detected.
10						
15	0		CB1A-15: 8, 12, 16			SILTY CLAY (cl): Same as above, slightly moist, no odor detected.
	0					
	0					
	0		CB1A-18: 10, 12, 14			SILTY CLAY (cl): Same as above, slightly moist, no odor detected.
20						TOTAL DEPTH = 19.5 FEET
25						
30						
35						

Dec 20, 2001 - 16:32:12 I:\IT CORP\Jervis Webb\log\CB1A.dwg

PROJECT NO. 831461
CLIENT: JERVIS B. WEBB
SEE LEGEND FOR LOGS AND TEST PITS
FOR EXPLANATION OF SYMBOLS AND TERMS

IT CORPORATION

BORING NO. CB-3A

Project Name: Jervis B. Webb
Location: 5030 Firestone Blvd. South Gate, CA.
Drill Company: A&R
Driller: Eodie
Rig/Core: Limited Access
Method: HSA
Init. H_2O Level: NA
Static H_2O Level: NA
Total Hole Depth: 37.5'
Borehole Dia.: 8"
Fill Material: Bentonite (#8)
Screen Dia.: NA
Depth Interval: NA
Casing Dia.: NA
Depth Interval: NA
Filter Pack/Depth: NA
Seal/Depth/Type: NA

NOTES:

- Augered through concrete.
- Hand augered to 5' for utility clearance.
- No groundwater encountered.
- Backfilled with bentonite to surface.
- Boring logged by cuttings and samples.

COORDINATES: N Not Surveyed, E Not Surveyed

FIELD GEOLOGIST: B. Tanaka
EDITED BY: B. Tanaka
CHECKED BY: P. Dinkmeyer
R.G. NO.: 4812
DATE BEGAN: 12-14-01
DATE FINISHED: 12-14-01
GROUND SURFACE EL.: Not meas.

DEPTH IN FEET	OVA READING (ppm)	WELL SUMMARY/ BACKFILL	PENETRATION RESISTANCE (BLOWS/6 INCHES) SAMPLE	USCS	PROFILE	DESCRIPTION
0						CONCRETE: 6" thick.
	0			sm		SILTY SAND (sm): Dark gray/brown, slightly moist, no odor detected.
5	0			ml		SILT (ml): Yellow brown, slightly moist, soft to stiff, slightly plastic, micaceous, no odor detected.
10	0			cl		SILTY CLAY (cl): Pale brown, slightly moist to moist, slightly plastic, very fine, no odor detected.
15	0					SILTY CLAY (cl): Same as above, slightly moist, no odor detected.
20	0			ml		SILT (ml): Dark gray, slightly moist, fine, soft, micaceous, no odor detected.
25	0					SILT (ml): Same as above, slightly moist to moist, no odor detected.
30	0			ml/sm		SANDY SILT (ml/sm): Dark gray, moist, very fine non-plastic silt, very fine sand, no odor detected.
35	0		CB3A-33 6			SANDY SILT (ml/sm): Same as above, moist, no odor detected.
	0		18			
	0		13			

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PROJECT NO. 831461
CLIENT: JERVIS B. WEBB
SEE LEGEND FOR LOGS AND TEST PITS FOR EXPLANATION OF SYMBOLS AND TERMS

IT CORPORATION

BORING NO. CB-3A

Project Name: Jervis B. Webb
Location: 5030 Firestone Blvd. South Gate, CA.
Drlg Company: A&R
Driller: Eddie
Rig/Core: Limited Access
Method: HSA
Init. H_2O Level: NA
Static H_2O Level: NA
Total Hole Depth: 37.5'
Borehole Dia: 8"
Fill Material: Bentonite (#8)
Screen Dia: NA
Depth Interval: NA
Casing Dia: NA
Depth Interval: NA
Filter Pack/Depth: NA
Seal/Depth/Type: NA

COORDINATES: N Not Surveyed, E Not Surveyed

FIELD GEOLOGIST: B. Tanaka — DATE BEGAN: 12-14-01
EDITED BY: B. Tanaka — DATE FINISHED: 12-14-01
CHECKED BY: P. Dinkmeyer — GROUND SURFACE EL. Not meas
R.G. NO. 4812

DEPTH IN FEET	OVA READING (ppm)	WELL SUMMARY/ BACKFILL	PENETRATION RESISTANCE (BLOWS/6 INCHES) SAMPLE	USCS	PROFILE	DESCRIPTION
35	0 0 0		CB3A-3c 14 32 40	sp		SAND (sp): Dark gray, well sorted, very fine, micaceous, dense, slightly moist, no odor detected.
40						TOTAL DEPTH = 37.5 FEET
45						
50						
55						
60						
65						
70						

NOTES:

- Augered through concrete.
- Hand augered to 5' for utility clearance.
- No groundwater encountered.
- Backfilled with bentonite to surface.
- Boring logged by cuttings and samples.

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PROJECT NO. 831461
CLIENT: JERVIS B. WEBB
SEE LEGEND FOR LOGS AND TEST PITS FOR EXPLANATION OF SYMBOLS AND TERMS

IT CORPORATION

BORING NO. CB-4A

Project Name: Jervis B. Webb
Location: 5030 Firestone Blvd. South Gate, CA
Drill Company: A&R
Driller: Eddie
Rig/Core: Limited Access
Method: HSA
Init. H_2O Level: NA
Static H_2O Level: NA
Total Hole Depth: 38.5'
Borehole Dia.: 8"
Fill Material: Bentonite (#8)
Screen Dia.: NA
Depth Interval: NA
Casing Dia.: NA
Depth Interval: NA
Filter Pack/Depth: NA
Seal/Depth/Type: NA

COORDINATES: N Not Surveyed, E Not Surveyed

FIELD GEOLOGIST: B. Tanaka — DATE BEGAN: 12-14-01
EDITED BY: B. Tanaka — DATE FINISHED: 12-14-01
CHECKED BY: P. Dinkmeyer — GROUND SURFACE EL.: Not meas.
R.G. NO.: 4812

NOTES:

- Augered through concrete.
- Hand augered to 5' for utility clearance.
- No groundwater encountered.
- Backfilled with bentonite to surface.
- Boring logged by cuttings and samples.

Depth in Feet	OVA Reading (ppm)	Penetration Resistance (Blows/6 Inches) / Sample	USCS	Description
0				CONCRETE: 3" thick.
	0		sm	SILTY SAND (sm): Dark brown, moist, loose, some clay and gravel, no odor detected.
5	0			SILTY SAND (sm): Same as above, slightly moist, no odor detected.
10	0		ml	CLAYEY SILT (ml): Dark gray/brown, moist, soft to firm, plastic, very fine, no odor detected.
15	0			SILT with sand (ml): Dark gray, slightly moist, fine, soft, micaceous, low plasticity, no odor detected.
20	0			SILT with sand (ml): Same as above, slightly moist, no odor detected.
25	0		cl	SILTY CLAY (cl): Dark gray, very fine, plastic, micaceous, slightly moist, no odor detected.
30	0			SILTY CLAY (cl): Same as above, slightly moist, no odor detected.
35	0	CB4A-3 15 20	sm/sp	SILTY SAND to SAND (sm/sp): Dark gray, moist to slightly moist, dense, no odor detected.

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PROJECT NO. 831461
CLIENT: JERVIS B. WEBB
SEE LEGEND FOR LOGS AND TEST PITS
FOR EXPLANATION OF SYMBOLS AND TERMS

IT CORPORATION

BORING NO. CB-4A

Project Name: Jervis B. Webb
Location: 5030 Firestone Blvd. South Gate, CA.
Drill Company: A&R
Driller: Eddie
Rig/Core: Limited Access
Method: HSA
Init. H_2O Level: NA
Static H_2O Level: NA
Total Hole Depth: 38.5'
Borehole Dia: 8"
Fill Material: Bentonite (#8)
Screen Dia: NA
Depth Interval: NA
Casing Dia.: NA
Depth Interval: NA
Filter Pack/Depth: NA
Seal/Depth/Type: NA

COORDINATES: N Not Surveyed, E Not Surveyed

FIELD GEOLOGIST: B. Tanaka
EDITED BY: B. Tanaka
CHECKED BY: P. Dinkmeyer
R.G. NO.: 4812
DATE BEGAN: 12-14-01
DATE FINISHED: 12-14-01
GROUND SURFACE EL.: Not meas.

DEPTH IN FEET	OVA READING (ppm)	WELL SUMMARY/ BACKFILL	PENETRATION RESISTANCE (BLOWS/6 INCHES)	SAMPLE	USCS	PROFILE	DESCRIPTION
35	0		40		sm/sp		SILTY SAND to SAND (sm/sp): Dark gray, moist to slightly moist, dense, no odor detected.
			CB4A-37		sp		SAND (sp): Dark gray, slightly moist, dense, very fine, well sorted, no odor detected.
	0		16				
	0		30				
	0		35				
40							TOTAL DEPTH = 38.5 FEET
45							
50							
55							
60							
65							
70							

NOTES:

- Augered through concrete.
- Hand augered to 5' for utility clearance.
- No groundwater encountered.
- Backfilled with bentonite to surface.
- Boring logged by cuttings and samples.

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PROJECT NO. 831461
CLIENT: JERVIS B. WEBB
SEE LEGEND FOR LOGS AND TEST PITS FOR EXPLANATION OF SYMBOLS AND TERMS

IT CORPORATION

UNIFIED SOIL CLASSIFICATION SYSTEM (USCS) (ASTM D2488-84)

Description and Identification of Soils (Visual-Manual Procedure)

MAJOR DIVISIONS			GROUP SYMBOL	GRAPHIC SYMBOL	GROUP NAME
COARSE-GRAINED SOILS <50% Passing #200 Sieve	GRAVELS	CLEAN GRAVELS	GW		Well-graded gravel Well-graded gravel with sand
			GP		Poorly graded gravel Poorly graded gravel with sand
		GRAVELS WITH FINES	GW-GM		Well-graded gravel with silt Well-graded gravel with silt and sand
			GW-GC		Well-graded gravel with clay Well-graded gravel with clay and sand
			GP-GM		Poorly graded gravel with silt Poorly graded gravel with silt and sand
			GP-GC		Poorly graded gravel with clay Poorly graded gravel with clay and sand
			GM		Silty gravel Silty gravel with sand
			GC		Clayey gravel Clayey gravel with sand
	SANDS	CLEAN SANDS	SW		Well-graded sand Well-graded sand with gravel
			SP		Poorly graded sand Poorly graded sand with gravel
		SANDS WITH FINES	SW-SM		Well-graded sand with silt Well-graded sand with silt and gravel
			SW-SC		Well-graded sand with clay Well-graded sand with clay and gravel
			SP-SM		Poorly graded sand with silt Poorly graded sand with silt and gravel
			SP-SC		Poorly graded sand with clay Poorly graded sand with clay and gravel
			SM		Silty sand Silty sand with gravel
			SC		Clayey sand Clayey sand with gravel
FINE-GRAINED SOILS >50% Passing #200 Sieve	SILTS AND CLAYS		CL		Lean clay - Lean clay with sand or gravel Sandy lean clay - Sandy lean clay with gravel Gravelly lean clay - Gravelly lean clay with sand
			ML		Silt - Silt with sand or gravel Sandy silt - Sandy silt with gravel Gravelly silt - Gravelly silt with sand
			CH		Fat clay - Fat clay with sand or gravel Sandy fat clay - Sandy fat clay with gravel Gravelly fat clay - Gravelly fat clay with sand
			MH		Elastic silt - Elastic silt with sand or gravel Sandy elastic silt - Sandy elastic silt with gravel Gravelly elastic silt - Gravelly elastic silt with sand
			OL/OH		Organic soil - Organic soil with sand or gravel Sandy organic soil - Sandy organic soil with gravel Gravelly organic soil - Gravelly organic soil with sand

Note:
For soils with two possible identifications a borderline symbol is used. A borderline symbol, such as CL/ML, will be used only after every effort has been made to place the soil into a single group. The first group symbol in the borderline symbol represents the predominant soil type.

Adapted from:
1988 Annual Book of ASTM Standards, Section 4, Volume 04.08

PROJECT NO. 831461

DRAWN BY | MBM/HDS X-X-X | CHECKED BY | APPROVED BY | DRAWING NUMBER | LEG1.DWG

DENSITY/CONSISTENCY CLASSIFICATION

DENSITY OF COARSE-GRAINED SOILS

DENSITY	BLOWS PER FOOT*
VERY LOOSE	0-4
LOOSE	5-10
MEDIUM DENSE	11-30
DENSE	31-50
VERY DENSE	OVER 50

CONSISTENCY OF FINE-GRAINED SOILS

CONSISTENCY	BLOWS PER FOOT*
VERY SOFT	<2
SOFT	2-4
FIRM	5-8
STIFF	9-15
VERY STIFF	16-30
HARD	OVER 30

*Blows with a 140-pound hammer falling 30 inches required to drive the designated sampler 12 inches into undisturbed materials.

CONTACTS

CONTACT (OBSERVED)

APPROXIMATE (±2 FEET)

INFERRED (±5 FEET)

SAMPLE TYPES

	2.0" O.D. MODIFIED CALIFORNIA SAMPLER	3.0" O.D. MODIFIED CALIFORNIA SAMPLER	S.P.T. SAMPLER	SHELBY TUBE	PITCHER SAMPLER	PLASTIC BAG	SACK	JAR	RING/ THIN WALLED TUBE
RELATIVELY UNDISTURBED	MD	3M	S	ST	P				
NO RECOVERY	MD	3M	S	ST	P				
BULK						PB	SK	J	R

GRAIN-SIZE DESCRIPTIONS (PER ASTM D2488-84)

Boulders – Particles of rock that will not pass a a 12-inch square opening.

Cobbles – Particles of rock that will pass a 12-inch square opening and can beretained on a 3-inch sieve.

Gravel – Particles of rock that will pass a 3-inch sieve and can be retained on a No. 4 (4.75 mm) sieve.

Sand – Particles of rock that will pass a No. 4 sieve and and can be retained on a No. 200 (75 μm) sieve.

Silt – Soil passing a No. 200 sieve that is nonplastic or very slightly plastic and that exhibits little or no strength when air dry.

Clay – Soil passing a No. 200 sieve that can be made to exhibit plasticity within a range of water contents.

PROJECT NO. 831461

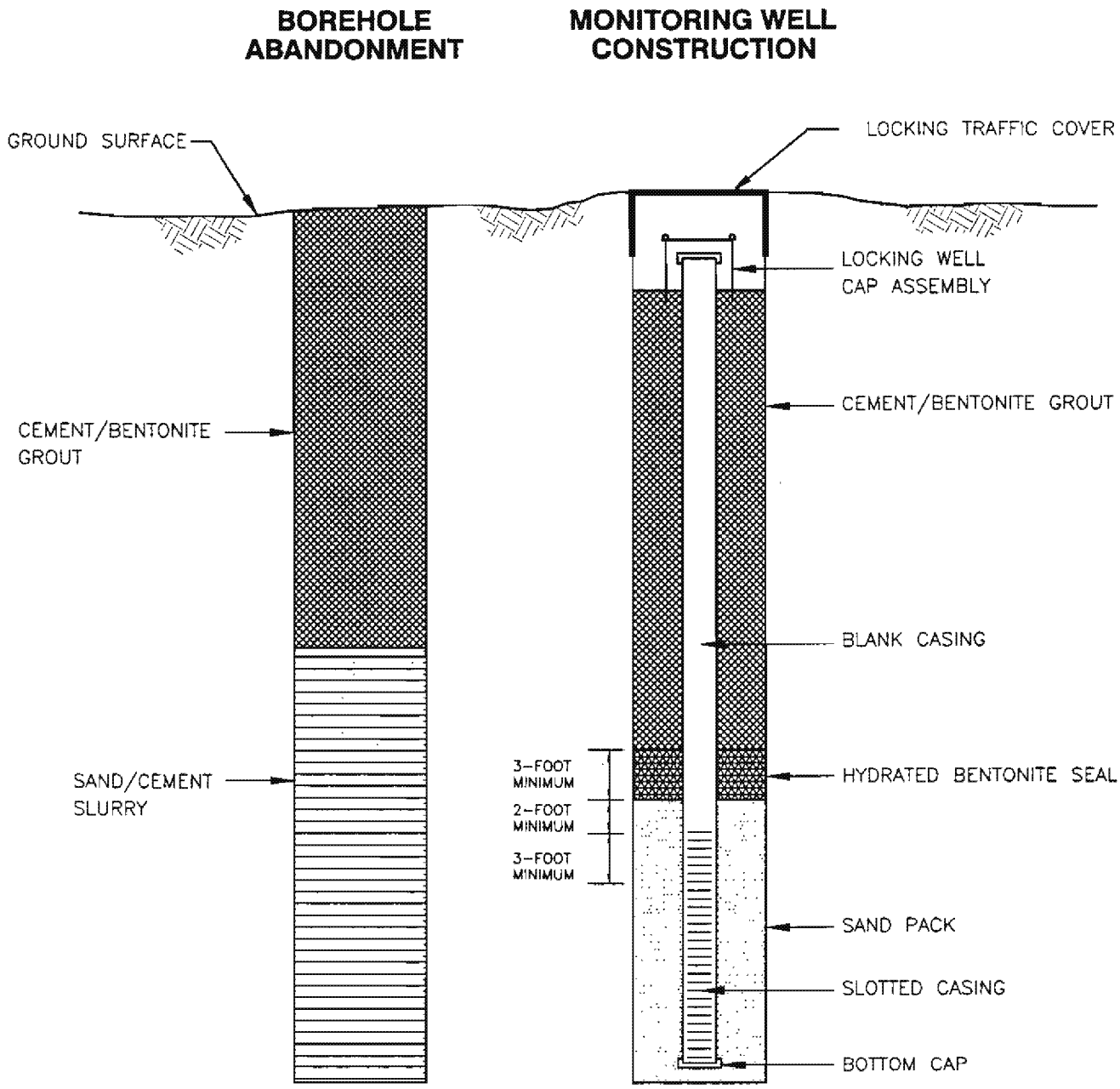
DRAWING NUMBER LEG2.DWG

CHECKED BY / APPROVED BY

MBM/HDS X-X-X

DRAWN BY

DRAWN BY	HDS	CHECKED BY / APPROVED BY		DRAWING NUMBER	LEGEND3



NOT TO SCALE

PROJECT NO. 831461

APPENDIX B

LABORATORY ANALYTICAL REPORTS AND CHAIN OF CUSTODY

Calscience Environmental Laboratories, Inc.

December 14, 2001

Gary Cronk
IT Corporation
3347 Michelson Drive, Suite 200
Irvine, CA 92612-1692

Subject: **Calscience Work Order No.: 01-12-0765**
Client Reference: Jervis B. Webb

Dear Client:

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received 12/14/01 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report, please do not hesitate to contact the undersigned.

Sincerely,

for

Calscience Environmental
Laboratories, Inc.
Larry Lem
Project Manager

Michael J. Crisostomo
Quality Assurance Manager

7440 Lincoln Way, Garden Grove, CA 92841-1432 • TEL: (714) 895-5494 • FAX: (714) 894-7501

Calscience Environmental Laboratories, Inc.

Analytical Report

LABORATORY ID: 01-12-0765

Method: Inorganic Constituents
Matrix: Soil/Solid

CLIENT: IT Corporation
PROJECT: Jervis B. Webb

Results

Sample ID	Hexavalent Chromium (mg/kg)	Dilution Factor
CB1A@18'	0.24	1
Method Blank	ND	1

EPA Method:	EPA 7196A/3060A
Date Analyzed:	12/14/01
Reporting Limit:	0.20

Quality Assurance and Control Information

Matrix Spike Sample ID: CB1A@18'

Batch ID: 121401	Spike Conc. ppm	LCS Result ppm	LCS Rec (%)	LCS Control Limits	MS Rec (%)	MSD Rec (%)	MS/MSD Control Limits	MS/MSD RPD (%)	RPD Control Limits
Hexavalent Chromium	0.50	0.50	100	80-120	95	94	70-130	0	0-25

Laboratory Notes

Key: ND=Not Detected at the reporting level, NA=Not applicable

7440 Lincoln Way, Garden Grove, CA 92841-1432 • TEL: (714) 895-5494 • FAX: (714) 894-7501

Calscience Environmental Laboratories, Inc.

ANALYTICAL REPORT

IT Corporation
3347 Michelson Drive, Suite 200
Irvine, CA 92612-1692

Date Received.	12/14/01
Work Order No	01-12-0765
Preparation	Total Digestion
Method	EPA 6010B

Project: Jervis B. Webb

Client Sample Number	Lab Sample Number	Matrix	Date Collected	Date Prepared	Date Analyzed	QC Batch ID
CB1A@18'	**01-12-0765-1**	**Solid**	**12/14/01**	**12/14/01**	**12/14/01**	**011214lcs2**

Parameter	Result	RL	DF	Qual	Units
Chromium (Total)	14.1	0.2	1		mg/kg

Method Blank	**097-01-002-2,972**	**Solid**	**N/A**	**12/14/01**	**12/14/01**	**011214lcs2**

Parameter	Result	RL	DF	Qual	Units
Chromium (Total)	ND	0.250	1		mg/kg

RL - Reporting Limit DF - Dilution Factor Qual - Qualifiers

7440 Lincoln Way, Garden Grove, CA 92841-1432 • TEL: (714) 895-5494 • FAX: (714) 894-7501

Calscience Environmental Laboratories, Inc.

ANALYTICAL REPORT

IT Corporation
3347 Michelson Drive, Suite 200
Irvine, CA 92612-1692

Date Received:	12/14/01
Work Order No:	01-12-0765
Preparation:	EPA 5035
Method:	EPA 8260B

Project: Jervis B. Webb

Client Sample Number	Lab Sample Number	Date Collected	Matrix	Date Prepared	Date Analyzed	QC Batch ID
CB3A@36'	**01-12-0765-2**	**12/14/01**	**Solid**	**12/14/01**	**12/14/01**	**121401AS**

Parameter	Result	RL	DF	Qual	Units	Parameter	Result	RL	DF	Qual	Units
Acetone	ND	24	1.21		ug/kg	1,3-Dichloropropane	ND	1.2	1.21		ug/kg
Benzene	ND	1.2	1.21		ug/kg	2,2-Dichloropropane	ND	6.1	1.21		ug/kg
Bromobenzene	ND	1.2	1.21		ug/kg	1,1-Dichloropropene	ND	2.4	1.21		ug/kg
Bromochloromethane	ND	2.4	1.21		ug/kg	c-1,3-Dichloropropene	ND	1.2	1.21		ug/kg
Bromodichloromethane	ND	1.2	1.21		ug/kg	t-1,3-Dichloropropene	ND	2.4	1.21		ug/kg
Bromoform	ND	6.1	1.21		ug/kg	Ethylbenzene	ND	1.2	1.21		ug/kg
Bromomethane	ND	6.1	1.21		ug/kg	2-Hexanone	ND	24	1.21		ug/kg
2-Butanone	ND	24	1.21		ug/kg	Isopropylbenzene	ND	1.2	1.21		ug/kg
n-Butylbenzene	ND	1.2	1.21		ug/kg	p-Isopropyltoluene	ND	1.2	1.21		ug/kg
sec-Butylbenzene	ND	1.2	1.21		ug/kg	Methylene Chloride	ND	12	1.21		ug/kg
tert-Butylbenzene	ND	1.2	1.21		ug/kg	4-Methyl-2-Pentanone	ND	24	1.21		ug/kg
Carbon Disulfide	ND	12	1.21		ug/kg	Naphthalene	ND	12	1.21		ug/kg
Carbon Tetrachloride	ND	1.2	1.21		ug/kg	n-Propylbenzene	ND	1.2	1.21		ug/kg
Chlorobenzene	ND	1.2	1.21		ug/kg	Styrene	ND	1.2	1.21		ug/kg
Chloroethane	ND	2.4	1.21		ug/kg	1,1,1,2-Tetrachloroethane	ND	1.2	1.21		ug/kg
Chloroform	ND	1.2	1.21		ug/kg	1,1,2,2-Tetrachloroethane	ND	2.4	1.21		ug/kg
Chloromethane	ND	1.2	1.21		ug/kg	Tetrachloroethene	ND	1.2	1.21		ug/kg
2-Chlorotoluene	ND	1.2	1.21		ug/kg	Toluene	ND	1.2	1.21		ug/kg
4-Chlorotoluene	ND	1.2	1.21		ug/kg	1,2,3-Trichlorobenzene	ND	2.4	1.21		ug/kg
Dibromochloromethane	ND	2.4	1.21		ug/kg	1,2,4-Trichlorobenzene	ND	2.4	1.21		ug/kg
1,2-Dibromo-3-Chloropropane	ND	6.1	1.21		ug/kg	1,1,1-Trichloroethane	ND	1.2	1.21		ug/kg
1,2-Dibromoethane	ND	1.2	1.21		ug/kg	1,1,2-Trichloroethane	ND	1.2	1.21		ug/kg
Dibromomethane	ND	1.2	1.21		ug/kg	Trichloroethene	24	2	1.21		ug/kg
1,2-Dichlorobenzene	ND	1.2	1.21		ug/kg	Trichlorofluoromethane	ND	12	1.21		ug/kg
1,3-Dichlorobenzene	ND	1.2	1.21		ug/kg	1,2,3-Trichloropropane	ND	2.4	1.21		ug/kg
1,4-Dichlorobenzene	ND	1.2	1.21		ug/kg	1,2,4-Trimethylbenzene	ND	2.4	1.21		ug/kg
Dichlorodifluoromethane	ND	2.4	1.21		ug/kg	1,3,5-Trimethylbenzene	ND	2.4	1.21		ug/kg
1,1-Dichloroethane	ND	1.2	1.21		ug/kg	Vinyl Acetate	ND	12	1.21		ug/kg
1,2-Dichloroethane	ND	1.2	1.21		ug/kg	Vinyl Chloride	ND	1.2	1.21		ug/kg
1,1-Dichloroethene	ND	1.2	1.21		ug/kg	p/m-Xylene	ND	2.4	1.21		ug/kg
c-1,2-Dichloroethene	ND	1.2	1.21		ug/kg	o-Xylene	ND	1.2	1.21		ug/kg
t-1,2-Dichloroethene	ND	1.2	1.21		ug/kg	Methyl-t-Butyl Ether (MTBE)	ND	2.4	1.21		ug/kg
1,2-Dichloropropane	ND	1.2	1.21		ug/kg						

Surrogates:	REC (%)	Control Limits	Qual	Surrogates	REC (%)	Control Limits	Qual
Dibromofluoromethane	108	65-157		Toluene-d8	97	51-144	
1,4-Bromofluorobenzene	98	49-141					

RL - Reporting Limit DF - Dilution Factor Qual - Qualifiers

Calscience Environmental Laboratories, Inc.

ANALYTICAL REPORT

IT Corporation		Date Received:	12/14/01
3347 Michelson Drive, Suite 200		Work Order No:	01-12-0765
Irvine, CA 92612-1692		Preparation:	EPA 5035
		Method:	EPA 8260B

Project: Jervis B. Webb

Client Sample Number	Lab Sample Number	Date Collected	Matrix	Date Prepared	Date Analyzed	QC Batch ID
CB4A@37'	**01-12-0765-3**	**12/14/01**	**Solid**	**12/14/01**	**12/14/01**	**121401AS**

Parameter	Result	RL	DF	Qual	Units	Parameter	Result	RL	DF	Qual	Units
Acetone	ND	24	1.18		ug/kg	1,3-Dichloropropane	ND	1.2	1.18		ug/kg
Benzene	ND	1.2	1.18		ug/kg	2,2-Dichloropropane	ND	5.9	1.18		ug/kg
Bromobenzene	ND	1.2	1.18		ug/kg	1,1-Dichloropropene	ND	2.4	1.18		ug/kg
Bromochloromethane	ND	2.4	1.18		ug/kg	c-1,3-Dichloropropene	ND	1.2	1.18		ug/kg
Bromodichloromethane	ND	1.2	1.18		ug/kg	t-1,3-Dichloropropene	ND	2.4	1.18		ug/kg
Bromoform	ND	5.9	1.18		ug/kg	Ethylbenzene	ND	1.2	1.18		ug/kg
Bromomethane	ND	5.9	1.18		ug/kg	2-Hexanone	ND	24	1.18		ug/kg
2-Butanone	ND	24	1.18		ug/kg	Isopropylbenzene	ND	1.2	1.18		ug/kg
n-Butylbenzene	ND	1.2	1.18		ug/kg	p-Isopropyltoluene	ND	1.2	1.18		ug/kg
sec-Butylbenzene	ND	1.2	1.18		ug/kg	Methylene Chloride	ND	12	1.18		ug/kg
tert-Butylbenzene	ND	1.2	1.18		ug/kg	4-Methyl-2-Pentanone	ND	24	1.18		ug/kg
Carbon Disulfide	ND	12	1.18		ug/kg	Naphthalene	ND	12	1.18		ug/kg
Carbon Tetrachloride	ND	1.2	1.18		ug/kg	n-Propylbenzene	ND	1.2	1.18		ug/kg
Chlorobenzene	ND	1.2	1.18		ug/kg	Styrene	ND	1.2	1.18		ug/kg
Chloroethane	ND	2.4	1.18		ug/kg	1,1,1,2-Tetrachloroethane	ND	1.2	1.18		ug/kg
Chloroform	ND	1.2	1.18		ug/kg	1,1,2,2-Tetrachloroethane	ND	2.4	1.18		ug/kg
Chloromethane	ND	1.2	1.18		ug/kg	Tetrachloroethene	ND	1.2	1.18		ug/kg
2-Chlorotoluene	ND	1.2	1.18		ug/kg	Toluene	ND	1.2	1.18		ug/kg
4-Chlorotoluene	ND	1.2	1.18		ug/kg	1,2,3-Trichlorobenzene	ND	2.4	1.18		ug/kg
Dibromochloromethane	ND	2.4	1.18		ug/kg	1,2,4-Trichlorobenzene	ND	2.4	1.18		ug/kg
1,2-Dibromo-3-Chloropropane	ND	5.9	1.18		ug/kg	1,1,1-Trichloroethane	ND	1.2	1.18		ug/kg
1,2-Dibromoethane	ND	1.2	1.18		ug/kg	1,1,2-Trichloroethane	ND	1.2	1.18		ug/kg
Dibromomethane	ND	1.2	1.18		ug/kg	Trichloroethene	ND	2.4	1.18		ug/kg
1,2-Dichlorobenzene	ND	1.2	1.18		ug/kg	Trichlorofluoromethane	ND	12	1.18		ug/kg
1,3-Dichlorobenzene	ND	1.2	1.18		ug/kg	1,2,3-Trichloropropane	ND	2.4	1.18		ug/kg
1,4-Dichlorobenzene	ND	1.2	1.18		ug/kg	1,2,4-Trimethylbenzene	ND	2.4	1.18		ug/kg
Dichlorodifluoromethane	ND	2.4	1.18		ug/kg	1,3,5-Trimethylbenzene	ND	2.4	1.18		ug/kg
1,1-Dichloroethane	ND	1.2	1.18		ug/kg	Vinyl Acetate	ND	12	1.18		ug/kg
1,2-Dichloroethane	ND	1.2	1.18		ug/kg	Vinyl Chloride	ND	1.2	1.18		ug/kg
1,1-Dichloroethene	ND	1.2	1.18		ug/kg	p/m-Xylene	ND	2.4	1.18		ug/kg
c-1,2-Dichloroethene	ND	1.2	1.18		ug/kg	o-Xylene	ND	1.2	1.18		ug/kg
t-1,2-Dichloroethene	ND	1.2	1.18		ug/kg	Methyl-t-Butyl Ether (MTBE)	ND	2.4	1.18		ug/kg
1,2-Dichloropropane	ND	1.2	1.18		ug/kg						

Surrogates:	REC (%)	Control Limits	Qual	Surrogates	REC (%)	Control Limits	Qual
Dibromofluoromethane	114	65-157		Toluene-d8	101	51-144	
1,4-Bromofluorobenzene	88	49-141					

RL - Reporting Limit DF - Dilution Factor Qual - Qualifiers

Calscience Environmental Laboratories, Inc.

ANALYTICAL REPORT

IT Corporation
3347 Michelson Drive, Suite 200
Irvine, CA 92612-1692

Date Received: 12/14/01
Work Order No: 01-12-0765
Preparation: EPA 5035
Method: EPA 8260B

Project: Jervis B. Webb

Client Sample Number	Lab Sample Number	Date Collected	Matrix	Date Prepared	Date Analyzed	QC Batch ID
Method Blank	**095-01-025-3,529**	**N/A**	**Solid**	**N/A**	**12/14/01**	**121401AS**

Parameter	Result	RL	DF	Qual	Units	Parameter	Result	RL	DF	Qual	Units
Acetone	ND	20	1		ug/kg	1,3-Dichloropropane	ND	1.0	1		ug/kg
Benzene	ND	1.0	1		ug/kg	2,2-Dichloropropane	ND	5.0	1		ug/kg
Bromobenzene	ND	1.0	1		ug/kg	1,1-Dichloropropene	ND	2.0	1		ug/kg
Bromochloromethane	ND	2.0	1		ug/kg	c-1,3-Dichloropropene	ND	1.0	1		ug/kg
Bromodichloromethane	ND	1.0	1		ug/kg	t-1,3-Dichloropropane	ND	2.0	1		ug/kg
Bromoform	ND	5.0	1		ug/kg	Ethylbenzene	ND	1.0	1		ug/kg
Bromomethane	ND	5.0	1		ug/kg	2-Hexanone	ND	20	1		ug/kg
2-Butanone	ND	20	1		ug/kg	Isopropylbenzene	ND	1.0	1		ug/kg
n-Butylbenzene	ND	1.0	1		ug/kg	p-Isopropyltoluene	ND	1.0	1		ug/kg
sec-Butylbenzene	ND	1.0	1		ug/kg	Methylene Chloride	ND	10	1		ug/kg
tert-Butylbenzene	ND	1.0	1		ug/kg	4-Methyl-2-Pentanone	ND	20	1		ug/kg
Carbon Disulfide	ND	10	1		ug/kg	Naphthalene	ND	10	1		ug/kg
Carbon Tetrachloride	ND	1.0	1		ug/kg	n-Propylbenzene	ND	1.0	1		ug/kg
Chlorobenzene	ND	1.0	1		ug/kg	Styrene	ND	1.0	1		ug/kg
Chloroethane	ND	2.0	1		ug/kg	1,1,1,2-Tetrachloroethane	ND	1.0	1		ug/kg
Chloroform	ND	1.0	1		ug/kg	1,1,2,2-Tetrachloroethane	ND	2.0	1		ug/kg
Chloromethane	ND	1.0	1		ug/kg	Tetrachloroethene	ND	1.0	1		ug/kg
2-Chlorotoluene	ND	1.0	1		ug/kg	Toluene	ND	1.0	1		ug/kg
4-Chlorotoluene	ND	1.0	1		ug/kg	1,2,3-Trichlorobenzene	ND	2.0	1		ug/kg
Dibromochloromethane	ND	2.0	1		ug/kg	1,2,4-Trichlorobenzene	ND	2.0	1		ug/kg
1,2-Dibromo-3-Chloropropane	ND	5.0	1		ug/kg	1,1,1-Trichloroethane	ND	1.0	1		ug/kg
1,2-Dibromoethane	ND	1.0	1		ug/kg	1,1,2-Trichloroethane	ND	1.0	1		ug/kg
Dibromomethane	ND	1.0	1		ug/kg	Trichloroethene	ND	2.0	1		ug/kg
1,2-Dichlorobenzene	ND	1.0	1		ug/kg	Trichlorofluoromethane	ND	10	1		ug/kg
1,3-Dichlorobenzene	ND	1.0	1		ug/kg	1,2,3-Trichloropropane	ND	2.0	1		ug/kg
1,4-Dichlorobenzene	ND	1.0	1		ug/kg	1,2,4-Trimethylbenzene	ND	2.0	1		ug/kg
Dichlorodifluoromethane	ND	2.0	1		ug/kg	1,3,5-Trimethylbenzene	ND	2.0	1		ug/kg
1,1-Dichloroethane	ND	1.0	1		ug/kg	Vinyl Acetate	ND	10	1		ug/kg
1,2-Dichloroethane	ND	1.0	1		ug/kg	Vinyl Chloride	ND	1.0	1		ug/kg
1,1-Dichloroethene	ND	1.0	1		ug/kg	p/m-Xylene	ND	2.0	1		ug/kg
c-1,2-Dichloroethene	ND	1.0	1		ug/kg	o-Xylene	ND	1.0	1		ug/kg
t-1,2-Dichloroethene	ND	1.0	1		ug/kg	Methyl-t-Butyl Ether (MTBE)	ND	2.0	1		ug/kg
1,2-Dichloropropane	ND	1.0	1		ug/kg						

Surrogates	REC (%)	Control Limits	Qual	Surrogates	REC (%)	Control Limits	Qual
Dibromofluoromethane	103	65-157		Toluene-d8	97	51-144	
1,4-Bromofluorobenzene	93	49-141					

RL - Reporting Limit , DF - Dilution Factor , Qual - Qualifiers

Calscience Environmental Laboratories, Inc.

ANALYTICAL REPORT

IT Corporation
3347 Michelson Drive, Suite 200
Irvine, CA 92612-1692

Date Received: 12/14/01
Work Order No: 01-12-0765
Preparation: EPA 5035
Method: EPA 8260B

Project: Jervis B. Webb

Client Sample Number	Lab Sample Number	Date Collected	Matrix	Date Prepared	Date Analyzed	QC Batch ID
Method Blank	**095-01-025-3,530**	**N/A**	**Solid**	**N/A**	**12/14/01**	**121401AS**

Parameter	Result	RL	DF	Qual	Units	Parameter	Result	RL	DF	Qual	Units
Acetone	ND	20	1		ug/kg	1,3-Dichloropropane	ND	1.0	1		ug/kg
Benzene	ND	1.0	1		ug/kg	2,2-Dichloropropane	ND	5.0	1		ug/kg
Bromobenzene	ND	1.0	1		ug/kg	1,1-Dichloropropene	ND	2.0	1		ug/kg
Bromochloromethane	ND	2.0	1		ug/kg	c-1,3-Dichloropropene	ND	1.0	1		ug/kg
Bromodichloromethane	ND	1.0	1		ug/kg	t-1,3-Dichloropropene	ND	2.0	1		ug/kg
Bromoform	ND	5.0	1		ug/kg	Ethylbenzene	ND	1.0	1		ug/kg
Bromomethane	ND	5.0	1		ug/kg	2-Hexanone	ND	20	1		ug/kg
2-Butanone	ND	20	1		ug/kg	Isopropylbenzene	ND	1.0	1		ug/kg
n-Butylbenzene	ND	1.0	1		ug/kg	p-Isopropyltoluene	ND	1.0	1		ug/kg
sec-Butylbenzene	ND	1.0	1		ug/kg	Methylene Chloride	ND	10	1		ug/kg
tert-Butylbenzene	ND	1.0	1		ug/kg	4-Methyl-2-Pentanone	ND	20	1		ug/kg
Carbon Disulfide	ND	10	1		ug/kg	Naphthalene	ND	10	1		ug/kg
Carbon Tetrachloride	ND	1.0	1		ug/kg	n-Propylbenzene	ND	1.0	1		ug/kg
Chlorobenzene	ND	1.0	1		ug/kg	Styrene	ND	1.0	1		ug/kg
Chloroethane	ND	2.0	1		ug/kg	1,1,1,2-Tetrachloroethane	ND	1.0	1		ug/kg
Chloroform	ND	1.0	1		ug/kg	1,1,2,2-Tetrachloroethane	ND	2.0	1		ug/kg
Chloromethane	ND	1.0	1		ug/kg	Tetrachloroethene	ND	1.0	1		ug/kg
2-Chlorotoluene	ND	1.0	1		ug/kg	Toluene	ND	1.0	1		ug/kg
4-Chlorotoluene	ND	1.0	1		ug/kg	1,2,3-Trichlorobenzene	ND	2.0	1		ug/kg
Dibromochloromethane	ND	2.0	1		ug/kg	1,2,4-Trichlorobenzene	ND	2.0	1		ug/kg
1,2-Dibromo-3-Chloropropane	ND	5.0	1		ug/kg	1,1,1-Trichloroethane	ND	1.0	1		ug/kg
1,2-Dibromoethane	ND	1.0	1		ug/kg	1,1,2-Trichloroethane	ND	1.0	1		ug/kg
Dibromomethane	ND	1.0	1		ug/kg	Trichloroethene	ND	2.0	1		ug/kg
1,2-Dichlorobenzene	ND	1.0	1		ug/kg	Trichlorofluoromethane	ND	10	1		ug/kg
1,3-Dichlorobenzene	ND	1.0	1		ug/kg	1,2,3-Trichloropropane	ND	2.0	1		ug/kg
1,4-Dichlorobenzene	ND	1.0	1		ug/kg	1,2,4-Trimethylbenzene	ND	2.0	1		ug/kg
Dichlorodifluoromethane	ND	2.0	1		ug/kg	1,3,5-Trimethylbenzene	ND	2.0	1		ug/kg
1,1-Dichloroethane	ND	1.0	1		ug/kg	Vinyl Acetate	ND	10	1		ug/kg
1,2-Dichloroethane	ND	1.0	1		ug/kg	Vinyl Chloride	ND	1.0	1		ug/kg
1,1-Dichloroethene	ND	1.0	1		ug/kg	p/m-Xylene	ND	2.0	1		ug/kg
c-1,2-Dichloroethene	ND	1.0	1		ug/kg	o-Xylene	ND	1.0	1		ug/kg
t-1,2-Dichloroethene	ND	1.0	1		ug/kg	Methyl-t-Butyl Ether (MTBE)	ND	2.0	1		ug/kg
1,2-Dichloropropane	ND	1.0	1		ug/kg						

Surrogates	REC (%)	Control Limits	Qual	Surrogates	REC (%)	Control Limits	Qual
Dibromofluoromethane	107	65-157		Toluene-d8	93	51-144	
1,4-Bromofluorobenzene	84	49-141					

RL - Reporting Limit DF - Dilution Factor Qual - Qualifiers

the group

0765

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD*

Reference Document No. 570209
Page 1 of ____

Project Name/No. 1 Jervis B Webb
Sample Team Members 2 Brian Tanaka
Profit Center No 3
Project Manager 4 Gary Cronk
Purchase Order No. 6
Required Report Date 11

Samples Shipment Date 7 12/14/01
Lab Destination 8 Cal Science
Lab Contact 9
Project Contact/Phone 12 949 660-7511
Carrier/Waybill No. 13

Bill to: 5 IT Corp
3347 Michelson Dr #200
Irvine CA 92612

Report to: 10 Gary Cronk
as above

ONE CONTAINER PER LINE

Sample Number 14	Sample Description/Type 15	Date/Time Collected 16	Container Type 17	Sample Volume 18	Pre-servative 19	Requested Testing Program 20	Condition on Receipt 21	Disposal Record No. 22
CB1A@18'	Soil	12/14/01 1015	Brass Sleeve	1	None	Total Chrome Hex Chrome (VI)		
CB3A@36'	Soil	12/14/01 1240	" Encore	4	"	VOC 8260B		
CB4A@37	Soil	12/14/01 1430	" Encore	4	"	VOC 8260D		
				9				

Special Instructions: 23

Possible Hazard Identification: 24
Non-hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown ☐

Sample Disposal: 25
Return to Client ☐ Disposal by Lab ☐ Archive (mos.)

Turnaround Time Required: 26
Normal ☐ Rush ☒

QC Level: 27
I. ☐ II. ☐ III. ☐ Project Specific (specify):

1. Relinquished by 28 (Signature/Affiliation) [signature]	Date: 12/14/01 Time: 1435	1. Received by 28 (Signature/Affiliation) [signature]	Date: 12/14/01 Time: 1435
2. Relinquished by (Signature/Affiliation)	Date: Time:	2. Received by (Signature/Affiliation)	Date: Time:
3. Relinquished by (Signature/Affiliation) [signature]	Date: 12/14/01 Time: 1530	3. Received by (Signature/Affiliation) [signature]	Date: 12/14/01 Time: 15:30

Comments: 29

White: To accompany samples
Yellow: Field copy
*See back of form for special instructions.

MCA 3/15/91

LATHAM & WATKINS
ATTORNEYS AT LAW
633 WEST FIFTH STREET, SUITE 4000
LOS ANGELES, CALIFORNIA 90071-2007
TELEPHONE (213) 485-1234
FAX (213) 891-8763

FACSIMILE TRANSMISSION

DATE: November 29, 2001

TO:

Name	Fax No.	Phone No.
Steve Hariri	(213) 576-6717	

FROM: Gene A. Lucero

RE: Jervis B. Webb of California Site , South Gate

☐ ORIGINAL(S) WILL FOLLOW	NUMBER OF PAGES, INCLUDING COVER: 2

MESSAGE:

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IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION, PLEASE CALL (213) 891-7533.

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November 29, 2001

Arthur Heath
Rebecca Chou
Steve Hariri
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California ("Webb")
City of South Gate
RWQCB LIC File No. 744 (the "Site")

Dear Art, Rebecca, and Steve:

On October 4, 2001, Webb submitted a Soil Closure Report as the culmination of extensive investigation and remedial efforts conducted at the Site over many years under the direction of the Regional Board as part of the fee-for-service program. Following submission of the Soil Closure Report, Webb structured a sale of the property to close by December 28, 2001, provided that the Board issued a soil closure letter.

In the October 29, 2001 follow-up letter from me to Dennis Dickerson, we explained the pending sale and requested that soil closure for the Site be issued by November 21, 2001 in order to meet the lender's procedures for approving financing and closing escrow on the sale of the property before year's end. Unfortunately, since the soil closure letter has not yet been issued, the sale of the property cannot occur as originally negotiated.

Webb has worked long and hard, with your assistance, to remediate the soil and position itself to sell this long-vacant property, located in a community redevelopment area, so that it can again become a job-producing, income-producing parcel of real estate that benefits the City of Southgate and the State of California. We have restructured the transaction to close on January 15, 2002, subject to receiving the soil closure letter and lender approval. In light of the restructured close of escrow, we ask that the soil closure letter be issued by December 19, 2001. This date is critical since the buyer's environmental review period expires on December 28, 2001 and without the closure letter it is likely that the present Purchase Agreement will be cancelled by the buyer.

If there is any assistance that our consultants, attorneys, or I can provide, we stand ready. Thank you for your continued attention and diligence on this matter.

Very truly yours,

Gene A. Lucero

Gene A. Lucero
of LATHAM & WATKINS

cc: Michael J. Farley

633 West Fifth Street, Suite 4000 • Los Angeles, California 90071-2007
Telephone: (213) 485-1234 • Fax: (213) 891-8763

LATHAM & WATKINS
ATTORNEYS AT LAW
633 WEST FIFTH STREET, SUITE 4000
LOS ANGELES, CA 90071-2007

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

01719-G1835-0003

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California Regional Water Quality Control Board

Los Angeles Region

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Governor

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

November 8, 2001

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

QUARTERLY PROGRESS REPORT AND REQUEST FOR REDUCTION IN THE FREQUENCY OF GROUNDWATER MONITORING – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the "Quarterly Progress Report", dated July 31, 2001. Based on our review of the information submitted, we have the following comments:

1. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.

2. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.

3. You are required to perform semiannual groundwater monitoring for volatile organic compounds (VOCs) and metals. The semiannual groundwater monitoring report must be submitted by the thirtieth day following the end of the semiannual period, as shown in the following schedule, with the first semiannual groundwater monitoring report due on **January 30, 2002**:

Report Period	Report Due Date
January – June	July 30th
July – December	January 30th

Please call me at (213) 576-6745, if you have any questions.

Sincerely,

S. Steven Hariri, PE
Water Resources Control Engineer - D
Site Cleanup I Unit

cc: Gary Cronk, IT Corporation
Steve Chambers, EKI, Inc.

1-14-02

Jervis Webb Meeting

Name	Organ. / Rep	Phone #
Arthur Heath	CRWQCB-LA	(213) 576-6725
Michael Scott Feeley	Latham & Watkins	213-891-7895
Mike Farley	Jervis B. Webb Co.	248-553-1201
Gene Lucero	Latham & Watkins	213-891-8332
David Buchholowski	RWQCB-LAR	(213) 576-6620
Dennis Dec[illegible]	"	213 576 6605

IT Corporation
3347 Michelson Drive, Suite 200
Irvine, CA 92612-1692

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SANTA ANA CA 927
PM
10 OCT
2001
US

CRWQCB
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Attn: Steve Hariri

3001342343

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WASHINGTON, D.C

October 29, 2001

VIA FAX & U.S. MAIL

2001 OCT 30 P 2:38

Dennis Dickerson
Executive Officer
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California ("Webb")
City of South Gate
RWQCB LIC File No. 744 (the "Site")

Dear Dennis:

We are requesting your assistance in obtaining soil closure for the above referenced Site in light of the pressing time constraints of a pending sale.

On October 4, 2001, Webb submitted the Soil Closure Report which presented the results of the five recent confirmation borings in the context of the extensive investigation and remedial efforts conducted at the Site over many years under the direction of the Regional Board. The Firestone property is Webb's only remaining real estate and Webb has already expended more than $900,000 in environmental costs at the Site, an amount which exceeds the sale price of the Firestone property. Webb has entered into a transaction to sell the Firestone property; however, the sale is contingent on receiving a soil closure letter from the Regional Board promptly and closing escrow by December 28, 2001. In order to meet the lender's procedures for approving financing, Webb must receive the closure letter as soon as possible but no later than Wednesday November 21, 2001.

The Firestone property is located in a community redevelopment area and the City of South Gate is particularly concerned with transforming this long vacant, non-income, non-job generating parcel into a productive economic use. We have requested soil closure of the Site at this time based on the extensive investigation of the Site, the removal of contaminant source areas, the SVE system's effective remediation of VOCs, the very low level of remaining residual VOCs, the background levels of naturally occurring arsenic, and the lithology and zoning of the Site.

We appreciate the heavy work load of you and your staff. Due to the time-sensitive nature of the transaction and the comprehensive investigation and remediation conducted over many years at the Site, we ask your help in obtaining prompt review and soil closure.

633 WEST FIFTH STREET, SUITE 4000 • LOS ANGELES, CALIFORNIA 90071-2007
TELEPHONE: (213) 485-1234 • FAX: (213) 891-8763

In addition, Webb has conducted quarterly groundwater monitoring of the Site since March 1998. The thirteen consecutive monitoring events have yielded consistent results. By letter dated July 31, 2001, Webb presented data demonstrating that a reduction in the frequency of monitoring is warranted. We have not yet received a response from the Regional Board to our plan to monitor annually rather than quarterly. Such a reduction is both appropriate and will facilitate the transaction. We would appreciate your written concurrence.

Thank you for your attention and consideration; we are available at your convenience to provide any additional information or answer any questions.

Yours very truly,

Gene A. Lucero

Gene A. Lucero
of LATHAM & WATKINS

cc: Arthur Heath
Rebecca Chou
Steve Hariri

Corporation
3.. 7 Michelson Drive, Suite 200
Irvine, CA 92612-1692
Tel. 949.261.6441
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2001 OCT 11 P 1:29

October 8, 2001

California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013
ATTN: Steven Hariri

RE: Explanation of SPLP Extraction Method
Soil Closure Report
Jervis B. Webb of California
South Gate, CA

Dear Mr. Hariri:

Per your request, I am writing to provide a further explanation of the SPLP extraction method used for the Jervis B. Webb Soil Closure Report submitted on October 4, 2001. I spoke with Larry Lem, Laboratory Director at Calscience Environmental Laboratories, who performed the SPLP extraction and testing for us. Mr. Lem stated that the SPLP method (EPA Method 1312) uses a 20:1 dilution (20 times the volume of water to soil) in the leaching process. Note: a 10-fold dilution is used in other leaching methods such the TCLP and the STLC. The concentration that is reported by the lab is the exact concentration of the leachate (no modification made for dilution). Therefore the concentration of the leachate can be directly compared to the MCL. In our case, the 10 ug/l from sample CB-4 @ 30 feet can be compared to the MCL for TCE of 5 ug/l. Note that because of the 20-fold dilution, the maximum concentration of the leachate (if all VOCs in the sample were leachable) would be 31 ug/l (630 divided by 20). Since our concentration was 10 ug/l, about 1/3 of the VOCs in the sample are leachable (and 2/3 are not leachable).

The SPLP method utilizes de-ionized water that is modified to a pH of 5.5 using sulfuric acid. This method is the least aggressive of the leaching methods. The other methods use a different acid and lower pH

I trust this information will be of use to you. Please call me at (949) 660-7511 if I can be of further assistance.

Sincerely,
IT Corporation

Gary Cronk

Gary Cronk, P.E.
Project Manager

Cc: Mike Farley, Jervis B. Webb
Michael Feeley, Latham & Watkins

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WASHINGTON, D.C.

October 4, 2001

Arthur C. Heath, Ph.D.
Rebecca Chow
Steve Hariri
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California
City of South Gate
RWQCB LIC File No. 744 (the "Site")

Dear Art, Rebecca & Steve:

Jervis B. Webb Company of California (Webb of California) is pleased to submit the attached Soil Closure Report for the Site. The report presents the results of the five recent confirmation borings in the context of the extensive investigation and remedial efforts conducted at the Site over several years. Based on the extensive investigation of the Site, the removal of contaminant source areas, the SVE system's effective remediation of VOCs, the very low level of remaining residual VOCs, the background levels of naturally occurring arsenic, the lithology and zoning of the Site, we are requesting soil closure of the Site at this time.

Webb of California has expended more than $900,000 in environmental costs at the Site. Webb of California is actively marketing its remaining portion of the property at a listing price significantly less than what it has expended to date. This vacant, non-income-generating property is Webb of California's sole asset.

In light of our efforts to sell the property by year end, we would appreciate your prompt review and consideration of our closure request. We are available to discuss any questions or issues which you may have.

Again, thank you for your attention.

Yours very truly,

Gene A. Lucero

Gene A. Lucero
of LATHAM & WATKINS

Enclosure

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 W. 4th Street, Suite 200, Los Angeles, CA 90013
Phone (213) 576-6600 FAX (213) 576-6640

Gray Davis
Governor

RECORD OF COMMUNICATION	☐ PHONE CALL ☐ CONFERENCE ☐ DISCUSSION ☐ OTHER (specify) ☑ FIELD TRIP	
TO: tel	FROM: STEVEN HAKIKI tel	DATE: 9/13/01
SUBJECT: FIELD INSPECTION OF CONFIRMATION BORINGS		FILE NO: 744

Summary of Conversation:

11AM ONSITE, PRESENT AT SITE CPT RIG, MOBILE LAB WITH GCMS AND GEOPROBE RIG. CURRENTLY WORKING ON B-16 CONFIRMATION BORING. CB-2 ALREADY COMPLETED. WILL COMPLETE CB-1, CB-3 AND B-15 WITH GEOPROBE. THE CPT RIG WILL NOT FIT INSIDE BUILDING. WILL WORK ON ACCESS TO RELIABLE STEEL FOR T-1 AND T-2 SAMPLING.

Conclusions, Action taken or required:

Information copies to:

California Re; 'onal Water Quality C ntrol Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

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

August 14, 2001

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

WORKPLAN FOR SOIL CLOSURE AND ADDENDUM TO WORKPLAN FOR SOIL CLOSURE – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the Workplan for Soil Closure" (workplan) and "Addendum to Workplan for Soil Closure", dated June 25, 2001 and July 18, 2001, respectively. Based on our review of the information submitted, you are authorized to implement the workplan with the following conditions:

1. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.

2. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.

3. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.

4. Please install two additional confirmation borings each next to the former location of Tank 1 and Tank 2, respectively. The borings shall be discreetly sampled from five feet below surface to first encountered groundwater. Please analyze soil samples for arsenic and hexavalent chromium by EPA 6000 and 7000 series methods.

5. Please install an additional confirmation borings next to borings B-15 and B-16. The borings shall be discreetly sampled form five feet below surface to first encountered groundwater. Please analyze soil samples for volatile organic compounds by EPA Method 8260B.

6. Confirmation borings CB-1, CB-2 and CB-3 shall be discreetly sampled from five feet below surface to first encountered groundwater. In addition to the proposed EPA Method 8260B analysis for all borings, please analyze soil samples from CB-1 and CB-2 for Title 22 Metals to include hexavalent chromium by EPA 6000 and 7000 series methods from 20 feet and 15 feet below ground surface to first encountered groundwater, respectively.

7. Please submit site-specific soil cleanup screening levels in your soil confirmation investigation report, based on site-specific conditions, soil-screening levels shall be determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook.

8. Please submit a soil confirmation investigation report incorporating all information in previous reports. It must include a site location map, site layout map, historical boring locations, monitoring well locations, groundwater gradient, soil and groundwater isoconcentration contours for each contaminant, tables of contaminants, geologic cross-sections with soil contamination isoconcentrations, and a thorough historical description of all activities at the site to date.

9. The following cleanup criteria shall apply to the project:

a. Petroleum hydrocarbons and volatile organic compounds (VOCs) – Based on site-specific conditions, soil-screening levels shall be determined in accordance with the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, or the preliminary remedial goals (PRGs) and soil screening levels prepared by the United States Environmental Protection Agency (U.S. EPA), Region IX, whichever is lowest.

b. Heavy metals and semi-VOCs – Based on site-specific conditions, the soluble designated level for constituents of concern shall be determined in accordance with the Designated Level Methodology for Waste Classification and Cleanup Level Determination dated 1986, updated 1989, by Jon Marshak, or the PRGs and soil screening levels prepared by U.S. EPA Region IX, whichever is lowest.

c. Risk assessments, including both human health risk assessments and ecological risk assessments, shall be conducted in areas where risk-based clean-up levels are established as cleanup criteria. Any such criterion requires approval by Office of Environmental Health Hazard Assessment (OEHHA) or Department of Toxic Substances Control (DTSC) and Regional Board Staff prior to implementation.

d. Please be advised that Total Threshold Limit Concentrations (TTLCs) and Soluble Threshold Limit Concentrations (STLCs) are waste classification criteria typically used for land disposal purposes. Waste classification levels are different from soil and groundwater cleanup levels, which are used for the protection of the groundwater resources and human health.

A report for the soil confirmation investigation must be provided to the Regional Board no later than **October 15, 2001**. Please call me at (213) 576-6745, if you have any questions.

Sincerely,

S. Steven Hariri, PE
Water Resources Control Engineer - D
Site Cleanup I Unit

cc: Gary Cronk, IT Corporation

JERVIS B. WEBB COMPANY
Law Department

34375 WEST TWELVE MILE ROAD
FARMINGTON HILLS, MICHIGAN 48331-5624

MICHAEL J. FARLEY
ASSOCIATE GENERAL COUNSEL

TELEPHONE: 1-248-553-1201
FACSIMILE: 1-248-553-1292
E-MAIL: MFarley@JERVISWEBB.COM

August 24, 2001

2001 AUG 27 P 3:55

Via Fax and U.S. Mail

Mr. Steven Hariri
California Regional Water Quality Control Board
320 4th Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California: Soil Closure Workplan and Addendum
5030 Firestone Blvd./ 9301 Rayo Avenue, South Gate, California
RWQCB SLIC File No. 744

Dear Mr. Hariri:

We have received and reviewed your letter dated August 14, 2001 approving implementation of the Workplan subject to certain enumerated conditions. Jervis B. Webb Company of California ("Webb") is prepared to accept each condition with the exception of condition 4. For the following reasons, we respectfully ask that you waive the request to install two borings next to the former locations of Tank 1 and Tank 2 on the Rayo property and sample for arsenic and hexavalent chromium.

We question the need to install two borings and sample for arsenic and hexavalent chromium in an area where seven discreet samples were previously taken and for which closure was granted. As you know, both Tank 1 and Tank 2 were removed and closed in 1996 under the direction of the Los Angeles County Department of Public Works ("LACDPW"). Sampling beneath the bottom of Tank 1 found arsenic levels (2.4 and 2.2 mg/kg) below the industrial PRG of 2.7 mg/kg, and total chromium levels (12 and 11 mg/kg) below the industrial PRG of 450 mg/kg. The total chromium results are also below the industrial PRG for hexavalent chromium of 64 mg/kg.

Tank 2 was actually a four foot deep sump. Following an over excavation to a depth of ten feet, sampling of the sidewalls and bottom of Tank 2 found arsenic levels of 1.6 mg/kg to 3.1 mg/kg, which is functionally the same as the industrial PRG of 2.7 mg/kg. Total chromium (ranging from 7.4 to 16 mg/kg) was below the industrial PRG for total chromium as well as below the industrial PRG for hexavalent chromium.

Not only are the levels of arsenic and chromium low, but these compounds do not readily migrate in soils. Moreover, there is a 3 to 5 foot thick continuous clay layer at 25 feet below ground

surface which forms a barrier to migration. Groundwater is found at 40 feet below ground surface.

The Rayo property is no longer owned by Webb. The former tank locations are beneath a concrete slab inside a large industrial hanger building in an area zoned heavy industrial. Heavy cut metal products and equipment are stored on and around the former tank location by the current owner. This makes access difficult. In addition, there is no guarantee that Webb could obtain an access agreement and conduct the testing in the near term.

In sum, prior sampling of Tank 1 and Tank 2 under the direction of the LACDPW found levels of arsenic at or below the industrial PRG and levels of chromium well below industrial PRGs; a 3 to 5 foot thick continuous clay layer underlies the area at a depth of 25 feet which provides a barrier to downward migration and there is a concrete slab covering the area which prevents contact with the soils; the property is not owned by Webb and the owner stacks heavy metal products at the former tank location. Based on these factors, we request withdrawal of condition 4 so that we can proceed promptly to implement the Workplan as modified by the Board.

If you feel you cannot withdraw condition 4, we would like to schedule a meeting to discuss this with the Board. Thank you for your assistance.

Sincerely,

Michael J. Farley
Associate General Counsel

MJF/sma
IM9685/1454

Jervis B. Webb Company
MATERIAL HANDLING SYSTEMS INTEGRATORS

World Headquarters / 34375 W. Twelve Mile Rd.
Farmington Hills, MI 48331-5624 USA

Mr. Steven Hariri
California Regional Water Quality Control Board
320 4th Street, Suite 200
Los Angeles, CA 90013

90013-2343 51

California R· ·onal Water Quality C ntrol Board

Los Angeles Region

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

File

August 14, 2001

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

WORKPLAN FOR SOIL CLOSURE AND ADDENDUM TO WORKPLAN FOR SOIL CLOSURE – JERVIS B. WEBB COMPANY – 5030 FIRESTONE BOULEVARD, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

The Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the Workplan for Soil Closure" (workplan) and "Addendum to Workplan for Soil Closure". dated June 25, 2001 and July 18, 2001, respectively. Based on our review of the information submitted, you are authorized to implement the workplan with the following conditions:

1. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.

2. Contaminated soil and groundwater generated during drilling and water sampling shall be managed in accordance with appropriate regulations.

3. Laboratory reports and method detection limits (MDLs) shall meet the requirements specified in the Regional Board's May 1996 Interim Site Assessment & Cleanup Guidebook, Appendices B and C.

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9. The following cleanup criteria shall apply to the project:

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d. Please be advised that Total Threshold Limit Concentrations (TTLCs) and Soluble Threshold Limit Concentrations (STLCs) are waste classification criteria typically used for land disposal purposes. Waste classification levels are different from soil and groundwater cleanup levels, which are used for the protection of the groundwater resources and human health.

A report for the soil confirmation investigation must be provided to the Regional Board no later than **October 15, 2001**. Please call me at (213) 576-6745, if you have any questions.

Sincerely,

S. Steven Hariri, PE
Water Resources Control Engineer - D
Site Cleanup I Unit

cc: Gary Cronk, IT Corporation

Fil # 0744

CSH

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2001 AUG -6 P 4:50

Erler & Kalinowski, Inc.

Consulting Engineers and Scientists

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Irvine, California 92614
www.ekiconsult.com
Tel. (949) 251-9480
Fax (949) 251-9508

31 July 2001

Mr. Steven Hariri
Site Cleanup Unit
California Regional Water Quality Control Board
Los Angeles Region
320 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Quarterly Progress Report for April through June 2001 and Request for Reduction in the Frequency of Groundwater Monitoring for the Jervis B. Webb Company of California Property, 5030 Firestone Boulevard, South Gate, California (RWQCB SLIC File No. 744; EKI 991103.01)

Dear Mr. Hariri:

On behalf of Jervis B. Webb Company of California ("Webb"), Erler & Kalinowski, Inc. ("EKI") is pleased to present the enclosed *Quarterly Progress Report for April through June 2001*, dated 24 July 2001. This report describes the groundwater monitoring and soil remediation activities completed during the period from April through June 2001 at the Webb property located at 5030 Firestone Boulevard in South Gate, California ("Site").

As shown in the enclosed report and other recent reports, quarterly groundwater monitoring at the Site during the past three years has yielded consistent results. Webb has conducted quarterly groundwater monitoring at the Site since March 1998; the enclosed progress report summarizes the results of the thirteenth consecutive quarter of groundwater monitoring at the Site. During these 13 groundwater monitoring events, the depth to groundwater generally has been measured once per month and samples of groundwater have been collected once per quarter from each of the monitoring wells at the Site. Each of the samples of groundwater collected at the Site have been analyzed for volatile organic compounds ("VOCs") using U.S. Environmental Protection Agency ("EPA") Method 8260B, or an equivalent method. In addition, the samples of groundwater collected during March and June 2001 were also analyzed for California Code of Regulations ("CCR") metals using EPA Methods 200.7, 206.2, 218.4, and 245.1.

The principle results of the groundwater monitoring performed at the Site are as follows:

- Monthly measurements of the depth to groundwater indicate that shallow groundwater beneath the Site consistently flows toward the south.

- The primary chemical of concern detected in samples of groundwater collected from monitoring wells at the Site is trichloroethene ("TCE"). The concentration of TCE detected in samples of groundwater collected from each of the monitoring wells at the Site has not varied significantly during three years of monitoring. As can be shown from the data provided in the enclosed report, the standard deviation of the TCE concentration detected in samples of groundwater collected from each well are less than 22 percent of the mean concentration for each well.
- No VOCs have been detected in samples of groundwater collected from downgradient monitoring well MW-4 during the last five quarterly monitoring events.

Given the consistent results obtained from three years of groundwater monitoring at the Site, Webb requests that the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB") reduce the required frequency of groundwater monitoring and reporting at the Site to one event per year. If this request is acceptable to the RWQCB, Webb proposes to initiate annual groundwater monitoring at the Site during January 2002. The groundwater monitoring will consist of annual measurement of the depth to groundwater and collection of groundwater samples from each well at the Site. The samples of groundwater collected at the Site will be analyzed for VOCs using EPA Method 8260B or an equivalent method. Webb will summarize the results of the groundwater monitoring in annual progress reports which will be submitted to the RWQCB within 60 days of the groundwater monitoring event. We look forward to receiving your approval for this modification.

Please contact us if you have any comments or questions regarding the enclosed report or Webb's request for reduction in the frequency of groundwater monitoring at the Site.

Very truly yours,

ERLER & KALINOWSKI, INC.

Steven R. Chambers, Ph.D.
Project Manager

cc: Mr. Michael Farley, Esq., Jervis B. Webb Company
Mr. Michael Feeley, Esq., Latham & Watkins

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2001 AUG -3 P 2:17

July 31, 2001

Arthur C. Heath, Ph.D.
Section Chief
California Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Re: Jervis B. Webb Company of California ("Webb of California")
City of South Gate
RWQCB LIC File No. 744

Dear Art:

I am writing to thank you, Rebecca Chou and Steve Hairiri for meeting with us on July 11, 2001, and to summarize our understanding of the agreements reached at the meeting and the responsibilities that the Board and Webb of California agreed to pursue with respect to the Webb site.

- The Board agreed that at this time soil closure at the Webb of California site could proceed separate from any possible further work with respect to groundwater at the site. Webb submitted its soil closure work plan on June 25, 2001 and an Addendum to that work plan on July 18, 2001. We are currently waiting for the Board's response to the work plan. IT Corporation has indicated that it can begin field work within approximately one week of receiving approval to proceed with the soil closure work plan.

- The Board understands that Webb of California has already spent more on environmental issues at the site than the expected market price for the property and the importance, from Webb of California's standpoint, in moving ahead with a sale of the property.

- The Board agreed to send out, subject to availability of resources, questionnaires to upgradient property owners to gather further information on contamination that may be coming from such properties.

633 West Fifth Street, Suite 4000 • Los Angeles, California 90071-2007
Telephone (213) 485-1234 • Fax (213) 891-8763

- Although the Board staff believes that Webb of California has presented credible evidence that contamination under its site may be coming from an offsite source, the Board staff would need additional information before it could recommend a No Further Action letter ("NFA") with respect to groundwater at the site. Webb of California agreed to present to the Board what, if any, further groundwater investigation Webb of California may propose to undertake.

- The Board staff does not expect Webb of California to do further groundwater investigation and/or remediation at the site; however, without further data, Board staff is not prepared to recommend an NFA for groundwater for Webb of California at this time.

Please let me know if you have any questions or if you disagree with this summary of the July 11 meeting. Once again, we appreciate your assistance and thank you for taking the time to meet with us.

Yours very truly,

Gene Lucero

Gene A. Lucero
of LATHAM & WATKINS

LATHAM & WATKINS
ATTORNEYS AT LAW
633 WEST FIFTH STREET, SUITE 4000
LOS ANGELES, CA 90071-2007

Arthur C. Heath, Ph.D
Section Chief
California Regional Water Quality Control Board
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90013-2343 31