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RECOMMENDATIONS FOR FURTHER ACTION

DATE: August 26, 1988

PREPARED BY: Alfred Wanger
DHS, Region 2

SITE: Proto Mold Manufacturing
1390 Old Bayshore Road
San Jose, California 95112

EPA ID#: CAD 98 235 9101
ASPIS ID#: 43-32-0041

Initial DHS Conclusions and Recommendations for Further Action:

a. Site Description:

Proto Mold Manufacturing is located at 1390 Old Bayshore Road, San Jose, CA (see Figure 1, Site Location Map). The site encompasses approximately 1.25 acres of land in an industrial area of San Jose (1). There are two buildings on the property, which have been used in the past by a variety of businesses, and an open rear portion of the property (see Figure 2, Site Map) (2). There are currently no operations at the site.

The site has been occupied since before 1950 (3). The site was owned by Clyde McCoy (now deceased) who operated a petroleum distributing company called "Pyro Penn" (3). The site was purchased in 1957 by Anton Pannutti (3). Pannutti operated a cosmetics and home cleaner manufacturing company at the site from approximately 1952 until 1978 (3). Several other companies leased space from Pannutti and operated at the Proto Mold facility including: Proto Mold Manufacturing (an injection molded plastics company manufacturing small plastic caps for Alhambra Water Bottles and small plastic containers); Construction Barricade Services; MCS Chemical Supplies (janitorial and cleaning supplies); Delano Welding, and Ed Dillon (woodwork and cabinetry) (3).

No information is available regarding the disposal practices of either Pannutti's, or the Proto Mold Manufacturing operations. However, surviving members of the Pannutti family stated that "bad" or "off spec" batches of product were remixed and reprocessed rather than disposed of off-site (3,4).

Earnest Nakaji, owner of San Jose Concrete Pipe Company which is adjacent to the site, is purchasing the Proto Mold property to expand his facility (5).

This site had been on the DHS Expenditure Plan for the Hazardous Substances Cleanup Bond Act of 1984 (BEP) since 1986 (6). As of

October 13, 1988, DHS has certified the remediation of the site (7).

Apparent Problem

The site was identified by the Abandoned Site Program of DHS in 1981 (1). A driveby of the site observed two dozen drums labeled Sodium Perborate Tetrahydrate, numerous five gallon cans, and ceramic debris in the rear portion of the property (1). The owners could not be located and the site was referred to the enforcement unit of DHS for further action (1). There is no information regarding any follow up enforcement action regarding this referral.

A site inspection was conducted by DHS on March 6, 1986, to assess the number of drums, their contents (if possible), and obtain information regarding the history of the site (4). Samples of the drums labeled "Sodium Perborate Tetrahydrate" were obtained and analyzed (4,8). Test results indicated that the drums contained hand soap (8).

As a result of that inspection DHS directed the Pannutti estate to submit a sampling and analysis plan for the characterization of the drums stored on-site on March 25, 1986 (9). This directive was amended on December 3, 1986, to allow for the removal of drums by a company experienced with handling hazardous waste, and the removal be accompanied by sampling and analysis of drum contents (10). Additionally, DHS requested the submittal of a soil sampling plan to determine whether there was any soil contamination (10). The site was added to the DHS Expenditure Plan for the Hazardous Substances Cleanup Bond Act of 1984 (BEP) on October 3, 1986 (6).

The Pannutti estate hired IT Corporation to conduct the drum removal and soil sampling (11). Under DHS oversight, approximately 90 drums were analyzed by HAZCAT and composite samples from these drums were analyzed (2). Samples of drum contents revealed phenols as the only hazardous material detected (2). Phenols were detected in 6 drums (2). All drums were removed by July 22, 1988, and disposed of off-site (2).

A former workshop inside the main building was found to contain an old inventory of laboratory chemicals (2). These chemicals, which were used in the manufacture of cosmetics and cleaners, were inventoried and sold to Mr. Ed Mesiti (12,13).

Post removal soil sampling was conducted for phenols in areas where the drums containing phenols (2). No soil contamination was detected (2). No hazardous materials remain at the site, and there has been no contamination of on-site soils detected (2). As of October 13, 1988, DHS has certified the remediation of the site, and is removing the site from the BEP (7).

HRS Factors:

Observed Release

There has not been an observed release to groundwater, surface water, or the air. There has been no contamination of soils at the site. Therefore, there is no potential release of contaminants to the environment. Because there is no observed release, no potential release of contaminants, and no target populations, HRS factors will not be evaluated.

Conclusions and Recommendations

The Proto Mold Manufacturing site, at 1390 Old Bayshore Road, San Jose, California, was involved in cosmetics and home cleaner manufacturing from approximately 1952 until 1978. Several other companies operated before, during, and after the cosmetics and home cleaner manufacturing including an injection molded plastics company (manufacturing small plastic caps for Alhambra Water Bottles and small plastic containers); Construction Barricade Services; MCS Chemical Supplies (janitorial and cleaning supplies); Delano Welding, and Ed Dillon (woodwork and cabinetry).

Approximately 90 drums were discovered in the rear portion of the property by the DHS Abandoned Site Program. Sampling revealed only phenols in six of the drums, and no soil contamination was detected. All drums were removed and disposed of off-site under DHS oversight. DHS has certified the remediation of the site and is removing the site from the DHS BEP.

EPA Recommendation for Further Action:

No Further Action under CERCLA.

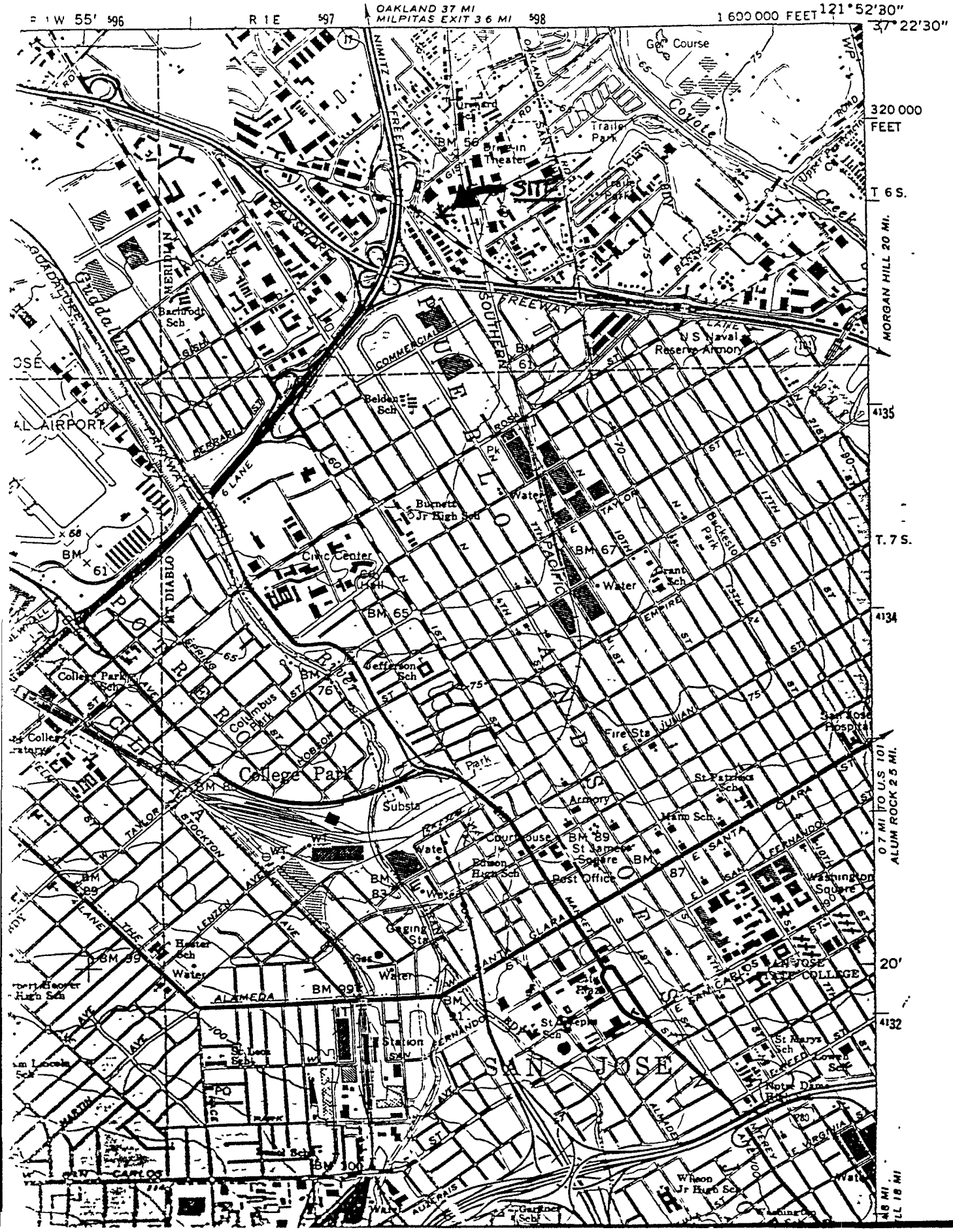
DHS Recommendation for Further Action:

No Further Action. The remediation of the site has been certified by DHS (October 13, 1988). The site is being removed from the BEP.

FIGURE 1: SITE LOCATION MAP

CALIFORNIA–SANTA CLARA CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
SW/4 SAN JOSE 15 QUADRANGLE

1658 IV NE (CALAVERAS RESERVOIR)



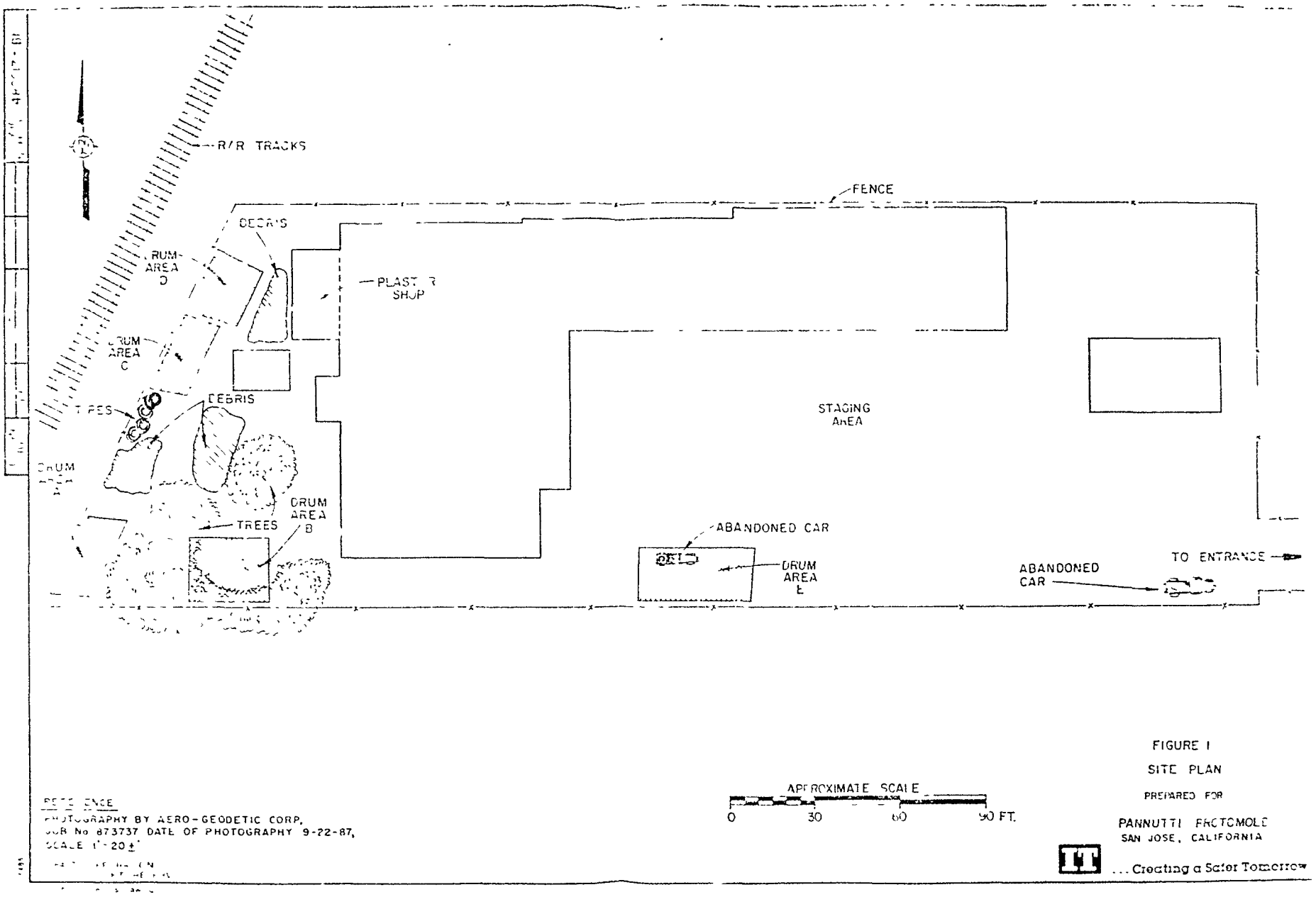


FIGURE 2: SITE MAP

Reference #2

PRELIMINARY ASSESSMENT CONTACT LOG

Facility Name: Proto Mold Manufacturing
EPA ID#: CAD 98 235 9101
ASPIS ID#: 43-32-0041

Name	Affiliation	Phone	Date	Information
Al Wanger	DHS Region 2	(415) 540-3401	8/3/88	DHS Files Reviewed
Receptionist	SF Bay RWQCB	(415) 464-1255	8/22/88	No File on site
Lee Esquibel	Santa Clara Department of Environmental Health	(408) 299-6930	8/22/88	Only Copies of DHS Correspondence in File

FIELD PHOTOGRAPHY LOG SHEET

DATE 9/1/87

TIME _____ A.M. (P.M.)

DIRECTION: (N) NNE NE ENE
E ESE SE SSE
S SSW SW WSW
W WNW NW NNW

WEATHER SUNNY, CLEAR

SITE PROTOMOLD

PHOTOGRAPHED BY: JIM REID IT CORP.

SAMPLE ID# (if applicable)

DESCRIPTION: ABANDONED DRUMS IN REAR PORTION OF PROPERTY N-END DRUM AREA A ON SITE MAP

DATE 9/1/87

TIME _____ A.M. (P.M.)

DIRECTION: N NNE NE ENE
E ESE SE SSE
(S) SSW SW WSW
W WNW NW NNW

WEATHER SUNNY, CLEAR

SITE PROTOMOLD

PHOTOGRAPHED BY: JIM REID IT CORP

SAMPLE ID# (if applicable)

DESCRIPTION: ABANDONED DRUMS IN REAR PORTION OF PROPERTY S END DRUM AREA D ON SITE MAP

FIELD PHOTOGRAPHY LOG SHEET

DATE 9/1/87

TIME _____ A.M. (P.M.)

DIRECTION: (N) NNE NE ENE
E ESE SE SSE
S SSW SW WSW
W WNW NW NNW

WEATHER CLEAR SUNNY

SITE PROTO MOLD

PHOTOGRAPHED BY:

JIM REID IT CORP

SAMPLE ID# (if applicable)

DESCRIPTION: ABANDONED DRUMS STACKED UNDER TREE IN REAR PORTION OF PROPERTY DRUM AREA B ON SITE MAP

DATE 9/1/87

TIME _____ A.M. (P.M.)

DIRECTION: N NNE NE ENE
E ESE SE SSE
S SSW SW WSW
(W) WNW NW NNW

WEATHER CLEAR SUNNY

SITE PROTOMOLD

PHOTOGRAPHED BY:

JIM REID IT CORP

SAMPLE ID# (if applicable)

DESCRIPTION: GENERAL DEBRIS IN REAR PORTION OF PROPERTY BEHIND MAIN BUILDING

FIELD PHOTOGRAPHY LOG SHEET

DATE 9/1/87

TIME _____ A.M. (P.M.)

DIRECTION: N NNE NE ENE
E ESE SE SSE
S SSW SW WSW
W WNW NW NNW

WEATHER —

SITE PROTOMOLD

PHOTOGRAPHED BY:
JEM REID IT CORP

SAMPLE ID# (if applicable)

DESCRIPTION: LAB CHEMICALS LEFT IN WORKSHOP IN MAIN BUILDING

DATE 10/27/87

TIME 2:00 A.M. (P.M.)

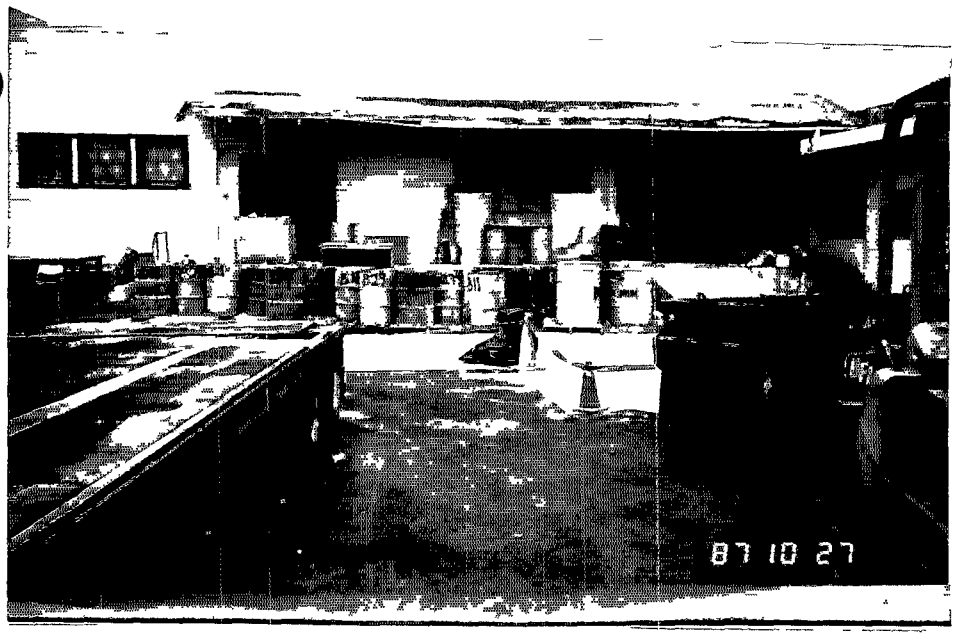
DIRECTION: N NNE NE ENE
E ESE SE SSE
S SSW SW WSW
W WNW NW NNW

WEATHER CLOUDY
LIGHT RAIN

SITE PROTOMOLD

PHOTOGRAPHED BY:
AL WANGER

SAMPLE ID# (if applicable)



DESCRIPTION: DRUM STAGING AREA PRIOR TO HAZCATTING & CHARACTERIZATION; FRONT PORTION OF MAIN BUILDING

REFERENCES

1. DHS, Abandoned Site Program Information System; 9/30/88

2. DHS Files: Letter and Report to Al Wanger, DHS, from Jim Reid, IT Corporation, Reference Protomold "De-Listing"; August 9, 1988.

3. DHS Files: Letter to Gabriel Dieb, IT Corporation, from Sahnta Lee Pannutti, September 28, 1987.

4. DHS Files: Memo to File from Denise Kato, DHS, regarding site visit, March 12, 1986.

5. DHS Files: Memo of Call, Telephone communication between Al Wanger, DHS, and Marge Bosetti, Bosetti Properties, May 27, 1987.

6. DHS Files: Report of Hazardous Substances Cleanup Bond Act Expenditure Plan Modification, October 3, 1986.

7. DHS Files: Remedial Action Certification Form, October 13, 1988.

8. DHS Files: Hazardous Substances Analysis Request, March 6, 1986.

9. DHS Files: Letter to Tony Pannutti from Dwight Hoenig, DHS, March 25, 1986.

10. DHS Files: Letter to Tony Pannutti from Jerome R. Marcotte, DHS, December 3, 1986.

11. DHS Files: Letter and Workplan to Robert Crandall, DHS, from Russell J. Enos, IT Corporation, April 13, 1987.

12. DHS Files: Letter to Sahnta Pannutti from Al Wanger, DHS, March 22, 1988.

13. DHS Files: Letter and Report to Al Wanger, DHS, from Jim Reid, IT Corporation, May 12, 1988.

REFERENCE #1

FACILITY PROFILE REPORT

COUNTY: SANTA CLARA REGION: NORTH COAST CALIFORNIA

FILE NUMBER	FACILITY
43-32-0041	PROTO MOLD MANUFACTURING 1390 OLD BAYSHORE HIGHWAY SAN JOSE, CA 95112

CHARACTERIZATION	ITEM	[illegible]
306 ACCESS	002 UNCONTROLLED	
406 CLIMATOLOGY	001 PRECIPITATION-INCHES	14
	003 JANUARY TEMP-DEG F	44
	004 JULY TEMP-DEG F	67

DATE	ACTION	COMMENT
02-05-02	2108 PRELIM ASSESSMENT	1 QUEST NOT RET'D 2 LIABILITY TO CONTACT OWNER
03-31-02	2109 FINAL STRATEGY	1 IDENT ABANDONED SITE
03-29-03	2109 FINAL STRATEGY	1 SITE DEFERRED. TO NUMB/CNT
12-05-07	2102 INSPECTION(LOCAL)	1 SITE OWNERS HAVE HIRED HAZ MAT CO (IT 2 CORP) TO CHARACTERIZE DRUMS ONSITE & 3 DEVELOP SOIL SAMPLING PLAN. FORM 8020 4 10-07. [illegible] 5 [illegible] 6 BEGIN IN EARLY [illegible]
	2401 SITE SCREENING DONE	1

COUNTY SANTA CLARA REGION NORTH COAST CALIFORNIA

FILE NUMBER FACILITY

[illegible]

[illegible]

[illegible]

REFERENCE #2

INTERNATIONAL TECHNOLOGY CORPORATION

TOXIC SUBSTANCES CONTROL DIVISION
8-152
AUG 09 1988

August 4, 1988

Mr. Al Wanger
Department of Health Services
2151 Berkeley Way
Berkeley, CA. 94704

REFERENCE: PANNUTTI PROTOMOLD "DE-LISTING"
ITC PROJECT NO. 480017; FILE NO. 86-0004

Dear Mr. Wanger:

International Technology's initial proposal for the Pannutti/Protomold consisted of a three phase scope of work:

Phase I - Environmental Investigation to Verify if Contamination Exists

Phase II - Development of a Corrective Action Plan

Phase III - Implementation of the Corrective Action Plan

We are pleased to inform you that as of July 29, 1988, all phases have been completed. Enclosed for your review is a detailed summary of the work performed by IT. We believe that all suspected hazardous material has been removed from the site. We hope that this summary will complete IT's involvement with the project and allow the DHS to "de-list" the site.

If you have any questions or require additional information, please contact me at (415)372-9100.

Sincerely,

James C. Reid

James C. Reid
Environmental Specialist

JCR:ps
MA:FLR:0077
Enclosures

Regional Office
4585 Pacheco Boulevard • Martinez, California 94553 • 415-372-9100

PHASE I - ENVIRONMENTAL INVESTIGATION TO VERIFY IF CONTAMINATION EXISTS

Phase I consisted of six specific tasks as outlined in the April 13, 1987 proposal letter. The following is a list of the Phase I tasks as completed by IT:

Task 1 - Data Collection, Meetings, Data Review

Site walks and meetings with the buyers, sellers and Department of Health Services (DHS) representatives were conducted throughout Phase I. Historical manufacturing records, DHS file documents, San Jose Hazardous Materials Unit reports and former employee interviews were completed by October 20th, 1987 and were subsequently used to formulate sampling, disposal, and health and safety plans. An aerial photograph of the site was taken so that a topographic site map could be prepared.

Task 2 - Preparation of a Health and Safety Plan

Mr. Michael Connor, an IT Certified Industrial Hygienist prepared a Health and Safety Plan specific to the Protomold site. The plan was reviewed by Mr. Al Wanger of the DHS on October 5th, 1987 in a meeting with Mr. Gabriel Dib and Mr. James Reid of IT Corporation. DHS requested changes were made to the plan and it was accepted (with addendum) on October 16th, 1987.

Task 3 - Prepare Quality Assurance/Quality Control Plan

An IT Corporation QA/QC plan, designed to assure work of the highest professional standards, was used for this project. All work on the Pannutti/Protomold project was done in compliance with corporate QA/QC guidelines.

Task 4 - Site Survey and Monitoring Location Selection

A topographic map has been constructed with drums, debris, and hazards identified. All drums were inventoried in place and identified according to location. No visible soil surface contamination was observed by IT DHS, therefore no soil sampling locations were proposed. Clean areas in front of the building were selected for a drum staging area and for a decontamination area.

Task 5 - Site Preparation/Field Monitoring/Sampling/Analysis

A. Site Preparation. Loose debris such as plaster moldings, bottles, tires, etc. were moved by backhoe to one area to provide room for safe working conditions. All stacked drums were lowered to the ground and each drum was labeled and numbered. Drums were moved to the staging area (front of the building) prior to sampling. Any damaged, fragile drums were overpacked into larger drums or the liquid was transferred to a new drum.

An old manufacturing laboratory contianing various chemicals was located within the main building. A complete chemical inventory was compiled.

B. Field Monitoring. The site was originally to be checked with a metal detector to locate underground pipes or subsurface drums. This plan was not implemented because: 1. the large quantity of metal debris and metal drums in the area would interfere with the detector and 2. after visual inspection there was no reason to believe that subsurface drums existed or that underground pipes would be effected.

Any noticeable stains on soil areas were to be checked with a Photo Ionization Detector. No visible stains were observed.

C. Sampling. At the staging area, drums were again inventoried and labels rechecked. All of the drums were opened and a brief description given for the contents of each drum. Selected discrete liquid and/or sludge samples were tested with a Hazardous Characterization (Hazcat) kit to provide compatibility results prior to laboratory analyses.

The discrete drum samples were hand delivered under chain of custody to the IT Vine Hill Laboratory in Martinez, CA. Using the Hazcat results as a guideline for compatability, the laboratory composited the discrete samples and subsequently performed predisposal analysis. Predisposal analyses were done on four (4) composite samples and one (1) discrete sample.

The four composites were obtained using the following criteria:

- Pure liquids with high hydrocarbon vapor pressures, indicating the potential of being flammable solvents, were composited to form Sample SA-E-1. Sample SA-E-1 was a composite of drums A-4, A-8, A-10, A-13, B-2, B-3, B-6, B-13, B-22, B-23 and D-1.

- Liquids with a low hydrocarbon vapor pressure were composited to form Sample SA-B-22. This sample was composed of discrete samples from drums A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3 and Composite E. Composite E was a field composite made of equal portions from drums E-2, E-4, E-5, E-6, and E-7.

- Semi-solid/sludge samples were composited to form sample SA-B-25. This sample was made up of discretes from drums A-11, B-1, B-8, B-9, B-10, B-12, B-14, B-15, B-17, B-18, B-19, B-32 and D-20.

- After opening and inspecting all 28 drums labeled sodium perborate tetrahydrate, three (3) drums deemed to be representative of of the 28 were field composited, and run as a separate sample. The field composite was taken from equal portions of drums C-4, D-9, and C-11. The laboratory designated this sample as SA-C4.

Drum B-21 was analyzed separately due to the fact that it was characterized as a fuming liquid. This sample is identified as SA-B21.

D. Analysis. All samples were analyzed in the laboratory for what IT terms "predisposal". This broad spectrum analysis is qualitative and quantitative and designed specifically to provide information allowing us to make judgements regarding proper transportation, storage and disposal of materials.

Task 6 - Documentation

Phase I was thoroughly documented and reviewed in preparation for Phase II.

PHASE II - DEVELOPMENT OF A CORRECTIVE ACTION PLAN

A comprehensive review of the Phase I - Environmental Investigation was undertaken to provide an effective plan for transportation, cleanup, and disposal of site materials. The implementation of this plan was contingent upon approval of the estate holders and the Department of Health Services (DHS).

Task 1 - Review, Plan Development, Meeting

IT reviewed Phase I activities and developed a corrective action plan. A meeting was held between key IT project staff and the estate representatives to: Review and discuss Phase I, review data and information, and discuss and assess the proposed corrective action plan. Subsequently the proposed corrective action plan was submitted for DHS approval.

Task 2 - Packaging and Disposal of Laboratory Chemicals

IT was to package the inventoried laboratory chemicals according to hazard categories, prepare a shipping list and stage the lab pack drums. Profile forms were to be sent to the appropriate disposal sites for approval prior to shipping. Estimated time for disposal sites approval was 4 to 5 weeks.

All chemicals except for those which are oxidizers or water reactives were to be transported by IT to disposal sites in California. The water reactives and oxidizers were to be transported to a site in Washington state.

Any reduction of the 107 item inventory, particularly the water reactives and oxidizers, would expedite the packaging. In this task no sampling was required and work was to begin within one week of plan approval.

Selling of the laboratory chemicals was proposed as an alternative to disposal. The DHS agreed to allow the chemicals to be sold.

Task 3 - Drum Removal and Disposal

IT proposed that this task be done in three parts as follows:

- Drums containing Phenols and PCBs were to be transported to an incineration unit.
- Liquids were to be siphoned from the drums and taken to an appropriate facility.
- Solids and drums were to be transported to a disposal site and buried.

Analytical results indicated levels of polychlorinated biphenyls (PCBs) and phenolics were present in a few of the drums. IT proposed that we pinpoint the drums which contain PCBs and/or phenolics, resample, and reanalyze them specifically for these contaminants. Analytical results were to be provided to the incineration site, drums transported and contents incinerated.

All remaining sludge/solids were to be stabilized, removed from the drums and loaded into a lined bin. The empty drums were to be crushed and placed in the bin. All of this material was to be taken to a disposal site and buried. Analyses were provided to the site so that no additional sampling was required.

During this time FAS personnel walked the site to determine if any visibly contaminated areas could be identified and sampled.

Task 4 - Documentation and Report Preperation

IT was to set up documentation of all aspects of Phase III including field sampling, analytical results, disposal sites and methods. A draft report was to be prepared for DHS review. The prime basis of the report was to detail the results of the corrective action plan on the Protomold property.

Task 5 - DHS Meeting/Site Walk

A meeting was held between key IT project staff, the client and DHS representatives to review the corrective action plan. The meeting was to provide the DHS with all proposed data needed to make determinations concerning the feasibility of the Phase II plan as it applied to "de-listing" the site.

PHASE III - IMPLEMENTATION OF THE CORRECTIVE ACTION PLAN

As per agreement between IT Corporation and the DHS, the following action items were to be addressed for the corrective action plan and de-listing:

Task 1

Identification, analysis and disposal of chemical storage drums located on site.

Task 2

Identification of sites of possible soil contamination, soil analysis, and plans for soil remediation, if necessary.

Task 3

Identification and disposal of laboratory chemicals.

Task 4

Removal of various commercial products remaining from past on-site manufacturing processes.

Task 1 - Identification, Analysis and Drum Disposal:

A topographic map of the site was prepared and the drum areas segregated into five locations. The drums were labeled and removed to a staging area. The staging area was covered with visqueen to avoid ground contamination from leaks or spillage. At the staging area, drums were visually inspected, opened, and contents described. Samples were taken from each drum using a glass thieving rod. The samples were categorized and segregated according to physical inspection. "Haz-cat" testing was performed on disparate samples. "Haz-cat" results were used as a qualitative measurement of compatability for compositing samples. The drum samples were sent to the IT Vine Hill Laboratory, composited and run through a "predisposal" suite of analyses. The "predisposal" analyses were used to determine disposal sites. The drum disposal was seperated into three categories:

1. Incineration

Composite SA-E-1 liquids showed high levels of phenolic compounds. All drums used to make up the composite were resampled specifically for phenols and the drums which tested positive were marked for incineration. The oil containing drums from area E were sampled and analyzed for PCBs. Even though the initial predisposal sample from these drums showed 1.3 ppm PCBs, subsequent analysis specifically for PCBs was negative. Since the results were negative, it was decided that these drums would not need to go for incineration. All drums earmarked for incineration were profiled for disposal at Romic Chemical in East Palo Alto, California. These drums were placed in 85 gallon overpack drums and were removed on July 20, 1988.

2. Liquid

All liquids not containing phenolics were siphoned into a vacuum truck and sent to Gibson Oil in Bakersfield, California for disposal on March 24, 1988.

3. Solids

All solids were emptied from the drums and placed in a lined bin. The drums were washed out (liquid from washout was included in the Gibson Oil disposal), crushed and placed in the bin. This waste was profiled for disposal at the Casmalia, California hazardous waste disposal site. The bin was sealed and taken for disposal on July 22, 1988.

Task - 2 Identification of Sites of Possible Soil Contamination, Analysis, Remediation

After discussions with the DHS, it was decided that soil samples would be taken in areas where drums containing PCBs and phenolics were found. Initially Area E was indicated for PCB testing and Area B for phenols. At the suggestion of the DHS, surficial samples were taken in Area E in spots where visual oil spillage had occured. Four surface scrapes were taken, composited in the field and analyzed for PCBs. Area B was sampled in two locations at a depth of 4' to 4'6" using a stainless steel auger. The samples were field composited and tested for phenols. Upon review of the liquid phenol analysis, it was determined that soil samples should also be taken in Areas C and D. Four surface scrapes were taken at each area and field composited. These areas were then tested for phenols. All soil sample results were negative, therefore no soil remediation is deemed necessary.

Task 3 - Identification and Disposal of Laboratory Chemicals

A lab inventory was taken. With DHS approval, the estate was given permission to sell the lab contents. The contents were sold to a Mr. Ed Mesiti and removed on March 15, 1988.

Task 4 - Removal of Commercial Products:

The Pannutti's have removed all products of the past manufacturing processes. These items included boxes of soaps, toilet cleaners, deodorizers, etc.

Enclosed for your review are the following support documents:

- Health and Safety Plan
- Site Map
- Drum Content Description
- Drum Sample Hazardous Characterization Results
- Master Sample Log
- Analytical Results
- Laboratory Inventory
- Copies of the Hazardous Waste Manifests

HEALTH AND SAFETY PLAN

IT CORPORATION

PANNUTTI/PROTOMOLD

SITE SAMPLING

HEALTH AND SAFETY PLAN

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1.0 HEALTH AND SAFETY

1.1 INTRODUCTION

It is the policy of IT Corporation (ITC) to provide a safe and healthful work environment for all its employees. IT considers no phase of operations or administration to be of greater importance than injury and illness prevention. Safety takes precedence over expediency or short cuts and every attempt will be made to reduce the possibility of injury, illness, or accident occurrence.

The purpose of the safety program is to assign IT site personnel health and safety responsibilities, prescribe mandatory operating procedures, establish personal protective equipment requirements for job or work or activity, for alternative and contingency work items, for emergency response and for spill clean-up and abatement in order to successfully and safely perform the sampling at the Pannutti/Protomold site in San Jose, California.

The provisions of this plan are mandatory for all IT personnel assigned to the project. All authorized visitors to the site will be required to abide by these procedures. Work conditions can be expected to change as the operation progresses. As appropriate, addenda to the plan will be provided by the Health and Safety (H&S) Division representative. No changes to the plan will be implemented without prior approval of the H&S Division.

1.2 ASSIGNMENT OF RESPONSIBILITIES

1.2.1 Project Manager

The Project Manager will be responsible for field implementation of the Health and Safety Plan. This will include communicating site requirements to all personnel, field supervision, and consultation with the H&S representative regarding appropriate changes to the Health and Safety Plan. The Project Manager will be Jim Reid.

1.2.2 Health and Safety Representative

A project H&S representative, Mr. Michael Connor, CIH, will be responsible for the development and coordination of the site Health and Safety Plan. This Plan will comply with established site specific procedures in all respects and will include medical surveillance, training requirements, hazard assessment, personal protective equipment, field implementation, and audits. Agency liaison on matters relating to safety and health will be handled by H&S Division representatives.

1.2.3 Technicians/Subcontractors

Technicians, subcontractors, and other personnel on-site will be responsible for understanding and complying with all site requirements.

1.3 MEDICAL PROGRAM

All ITC personnel on-site shall have successfully completed a preplacement or periodic/update physical examination. This examination has been designed to comply with appropriate regulatory requirements for hazardous waste site operations.

The IT Corporation medical program as outlined in ITC Policy and Procedures 9010.1B and 9410.2A, consists of:

- Medical and Occupational History Form (detailed questionnaire for new employees, short questionnaire for periodic exams).
- Physical Examinations,
- Blood Analysis,
- Urinalysis,
- Chest X-ray,
- Pulmonary Function Test,
- Audiogram,
- Electrocardiogram (if indicated during exam)

1.4 EMERGENCY MEDICAL TREATMENT

The following procedures have been established to provide appropriate assistance should there be an occupational illness or injury on site:

1. There will be at least one individual currently certified in Cardiopulmonary Resuscitation and First Aid on-site. A first aid kit will be available on site.

2. A local nearby hospital shall be identified prior to job starting up. Its location shall be shown on a route map, which is to be attached to the tailgate safety meeting form. This form shall also show the ambulance or paramedic telephone and emergency numbers. The location of the nearest telephone to the job site shall be identified during the tailgate safety meeting.

3. In the event of illness or injury, the following steps will be taken:

   a. Administer first aid or CPR only if trained.

   b. Notify project management.

   c. Notify Health and Safety.

   d. Transport injured if possible. Do not transport if fractures are involved. Call ambulance if necessary.

   e. Complete the Supervisors Employee Injury Report within 24 hours.

1.5 TRAINING

All ITC project personnel shall have completed the corporate Hazards and Protection course. This course covers chemical hazards, hazard recognition, hazard assessment, personal protective equipment and proper handling techniques for hazardous materials.

1.6 HAZARD EVALUATION AND SAFETY CONSIDERATIONS

The site work, such as drum sampling, can potentially expose site personnel to chemical and physical hazards. These hazards may include toxic airborne contaminants, slips, trips, falls and heat stress. These hazards will be reduced through the use of personal protective equipment and safe work practices, as set forth in this plan.

The relative toxicological risks associated with this project are limited based on the nature of past operations and based on the nature of the project. The sampling of each drum will represent a limited time of exposure and thus limit the toxicological risk to potentially toxic substances. Past operations involved the use of caustic liquids, fatty acid salts, and low toxicity solvents such as acetone. For these reasons, EPA Level C protection will provide adequate protection.

1.7 GENERAL SITE SAFETY REQUIREMENTS

1. Prior to starting work the sampling area shall be delineated into two zones, as follows:

   - Zone of possible contamination - This zone includes all areas of potentially contaminated soil and an area 5 feet beyond the perimeter of such potentially contaminated soil.

   - Clean Zone - This zone covers all areas outside of the zone of potential contamination. Adverse exposure to chemicals is unlikely.

   The delineation of these zones shall be sketched in the field log book.

2. A decontamination station shall be established at the border of the zone of potential contamination reduction. All personnel entering or leaving the sampling site shall pass through this station to don or doff the appropriate protective equipment. Used protective clothing shall be bagged in this area.

3. A tailgate safety meeting shall be conducted at the beginning of each shift and whenever new personnel arrive, or when a unique work assignment warrants employee indoctrination and training. Tailgate safety meetings are to be conducted by the supervisor, a safety representative, or other qualified persons.

4. The field supervisor shall take positive steps to ensure that employees are protected from physical hazards, which would include, but are not limited to, the following:

    - Insufficient or faulty personal protective equipment
    - Insufficient or faulty operations equipment and tools
    - Noise in excess of acceptable levels
    - Tripping over hoses, pipes, tools, or equipment
    - Slipping on wet or oily surfaces
    - Appropriate action to provide secure footing shall be taken at all locations where personnel will be working.

5. Legible and understandable precautionary labels shall be prominently affixed to containers of raw materials, intermediates, products, by-products, mixtures, scrap, waste, debris, and contaminated clothing.

6. Eating, drinking and smoking shall be restricted to areas within the clean zone.

7. Bulging drums shall be opened with a remote drum opening unit powered by compressed air. All personnel shall stand upwind of the work area when opening bulging drums.

8. Field personnel must observe themselves and each other for signs of toxic exposure. Indications of adverse effects include, but are not limited to:

    - Changes in complexion and skin color
    - Changes in coordination

- Changes in demeanor
- Excessive salivation
- Abnormal pupillary response
- Changes in speech pattern.

9. Field personnel shall be instructed to inform their supervisor of any non-visual effects of toxic exposure such as:

    - Headaches
    - Dizziness
    - Nausea
    - Blurred vision
    - Cramps
    - Irritation of eyes, skin, or respiratory tract
    - Any other abnormal physiological functions.

10. Appropriate drum handling procedures such as the use of forklifts shall be used to minimize the physical hazards associated with such activities.

11. A portable emergency eyewash shower shall be attainable on site. It shall be kept in a shaded area, less than 100 feet from the work area, to avoid heating its contents significantly.

1.8 PROTECTIVE EQUIPMENT REQUIREMENTS

1. Personal protective equipment requirements will be established via task assignment and location. Two zones will be established on-site with requirements tailored to the specific needs of each zone.

    Clean Zone: No special protective equipment is required for work in this area.

    Zone of Potential Contamination: The following will be the minimum requirement for work within this zone:

Hard hat,
Safety glasses,
White tyvek coveralls,
PVC boots with steel toe,
Nitrile gloves,
Scott 64 half-face air purifying respirator with 624 OVH cartridges (organic vapor/H.E.P.A.)

2. Respiratory Protection

All respirators shall be utilized and maintained in accordance with established procedures. These procedures include written operating instructions governing the selection, instruction and training, cleaning and sanitizing, inspection and maintenance of these respirators. Taken together, these procedures comply with 29 CFR Section 1910.134.

Properly cleaned, maintained, NIOSH approved respirators shall be used.

IT Health and Safety Division has reviewed the selection of respirators for the project, in accordance with ITC's respiratory protection policy.

As a minimum, air purifying cartridges shall be replaced at the end of each day.

Employees wearing air-purifying respirators shall be required to change filter elements whenever an increase in breathing resistance or breakthrough is detected.

1.9 Decontamination

No personal protective equipment shall be worn out of the contaminated area. Employees leaving the contaminated area shall remove protective clothing at the area required by Section 1.7.2 of this plan.

Visibly contaminated clothing shall be placed in plastic bags which shall

be appropriately labelled. Visibly clean protective clothing may be re-used on the same day. Contaminated equipment shall be washed with soap and water prior to removal.

Employees shall wash hands and face prior to eating, drinking and smoking. The field supervisor shall ensure there are adequate facilities available for this purpose.

1.10 HEAT STRESS

The use of impermeable personal protective equipment in warm environment may lead to heat stress which will result in physical discomfort, reduced efficiency and increased accident probability. Although white tyvek is the type of protective clothing least likely to lead to heat stress, the following measures shall be taken to minimize heat stress:

a) An adequate supply of drinking water will be available for use. Employees shall be encouraged to drink more than the amount required to satisfy thirst, as thirst satisfaction is not an accurate indicator of adequate salt and fluid replacement.

b) Employees shall be instructed to monitor themselves for such symptoms of heat stress as headaches, dizziness, nausea, cramps, and fatigue. Where these become obvious, breaks shall be taken in a cool shaded area. Protective clothing shall be removed and no other tasks will be assigned during these rest periods. The cooling off breaks shall last a minimum of 10 minutes.

c) Employees shall be encouraged to follow a balanced diet and to obtain adequate rest as a means to prevent heat stress. The delirious effects of alcohol consumption with regards to heat stress prevention shall be reviewed with employees.

STATE OF CALIFORNIA—HEALTH AND WEL AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
2151 BERKELEY WAY
BERKELEY, CA 94704

RECEIVED
OCT 09 1987

October 6, 1987

CERTIFIED MAIL

Mr. Jim Reid
IT Corporation
4585 Pacheco Boulevard
Martinez, CA 94553

Dear Mr. Reid:

Following our meeting on Monday, October 5, 1987, I reviewed IT's draft Health and Safety plan with our regional Industrial Hygienist. He felt that the plan was generally acceptable, although he had several comments and suggestions for improvement. These are as follows:

* Phone numbers should be included in the plan for the Project Manager, Site Safety Officer (if different than the Project Manager), Health and Safety representative and other appropriate contact persons. Also, all emergency phone numbers should be included in the plan.

* The location of the nearest telephone should be included in the plan. Additionally, a map showing the route to the nearest hospital or emergency medical facility should also be included.

* Chemical goggles should be worn if workers are using a half-face air purifying respirator rather than safety glasses.

* Coated tyvek (PE tyvek or Saranex) should be worn by workers actually sampling drums. Plain tyvek provides insufficient protection for splash hazards, especially when working with caustic materials.

* EPA guidelines for monitoring Heat Stress should be followed. (See attachment 1)

* Plan should state what action will be taken if direct measurement shows the concentration of vapors are high during drum sampling activity. Will the level of protection be changed (SCBA) or will workers leave the area?

* A windsock or some other device should be used so workers can easily ascertain wind direction.

I have also included draft DHS guidelines for the development of site safety plans for your information. If you have any questions, feel free to contact me at (415) 540-2090.

Sincerely,

Al Wanger

Al Wanger
Hazardous Materials Specialist
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

Cert. #P 692 236 560

Enclosures

INTERNATIONAL TECHNOLOGY CORPORATION

October 20, 1987

Mr. Al Wanger
Hazardous Materials Specialist
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division
Department of Health Services
2151 Berkeley Way
Berkeley, CA 94704

480017.01.01

Dear Mr. Wanger:

The purpose of this letter is to address your comments on IT's Health and Safety Plan for the Pannutti/Protomold project in San Jose. You recently sent these comments to Mr. Jim Reid, IT's Project Manager, on October 6, 1987. The order of these responses corresponds to that of your comments.

- Mr. Reid will be on site during field activities. Should he be absent, he may be contacted at (415) 372-9100, extension 3182. As the project Health and Safety Coordinator, I will be available at (415) 372-9100, extension 3136. Emergency telephone numbers shall be included in the Tailgate Safety Meeting Form, which shall be completed daily. Each employee on site is required to sign the form.

- The Project Manager, Mr. Reid, shall identify the location of the nearest telephone to the crew at the beginning of the project. Mr. Reid is also responsible for providing a route map to the nearest emergency medical facility, which shall be identified at the beginning of each day.

- Since sampling drums represents a low potential for splashes, face shields shall be worn in addition to safety glasses.

- Polyethylene coated Tyvek shall be required when sampling drums.

- Heat stress is not anticipated to be a problem. Mr. Reid is fully aware of the potential for heat stress when protective clothing is worn. He will remind site employees of this potential and will instruct them to

monitor themselves and each other for heat stress. IT's employees have been instructed in the signs and symptoms of heat stress.

Additionally, Gatorade will be available as will a shaded area for rest. Break periods shall last 10 minutes.

- In the unlikely event of high levels (i.e., more than 10 ppm) in the breathing zone, employees shall evacuate the immediate work area. It should be noted that although headspace levels in the drum may be high, breathing zone levels will be much lower, since the drum opening is a point source. Further, sampling employees will be wearing respiratory protection.

- Since Mr. Reid will be supervising on site during field activities, he shall determine wind direction, and inform employees, as necessary.

As stated in the Health and Safety Plan, this project represents a relatively low toxicological hazard to employees conducting the proposed activities. Therefore, the measures indicated in the Health and Safety Plan, and as shown above, will provide more than adequate protection.

If you have any questions regarding the health and safety of this project, please feel free to call me.

Sincerely,

Michael Connor

Michael Connor, CIH
Industrial Hygienist

MC:
PRO/L101B
FAS:3065

SITE MAP

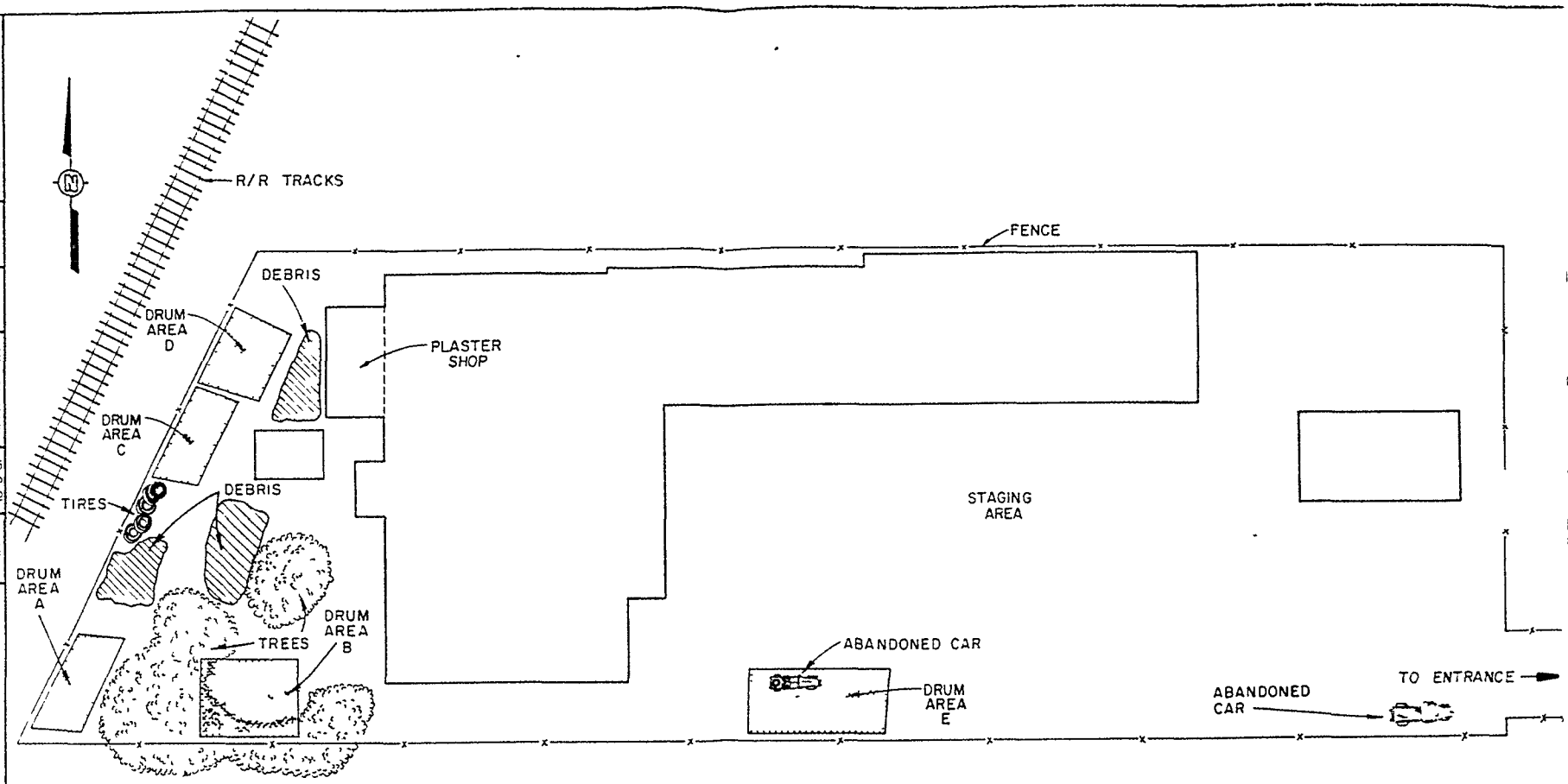

FIGURE 1

SITE PLAN

PREPARED FOR

PANNUTTI PROTOMOLD
SAN JOSE, CALIFORNIA

APPROXIMATE SCALE

0 30 60 90 FT

REFERENCE

PHOTOGRAPHY BY AERO-GEODETIC CORP,
JOB No 873737 DATE OF PHOTOGRAPHY 9-22-87,
SCALE 1"=20±'

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IT

Creating a Safer Tomorrow

DRAWING NUMBER 480017-B1

DRAWN BY SLC 10 5 87

CHECKED BY

APPROVED BY

DRUM CONTENT DESCRIPTION

PANNUTTI/PROTOMOLD

PRELIMINARY DRUM SAMPLING DESCRIPTION

October 28, 1987

Project No: 480017.01.05.02

Drum No.	Description	Time	Comments
A-1	Solid	1155	Less than 10% of drum contains product
A-2	Empty	1154	
A-3	Dark blue viscous liquid	1157	Drum leaks, old drum overpacked into 85 gallon drum, full drum
A-4	Red-brown liquid/sludge	1158	~ 1/2 full drum
A-5	Solid	1217	2" in bottom of drum
A-6	Red-brown liquid/sludge	1215	1" in bottom of drum
A-7	Red-brown oily liquid	1213	~ 1/2 full drum
A-8	Red-brown liquid/sludge	1211	Full drum
A-9	Solid	1209	~ 3/4 full drum
A-10	Dark brown viscous liquid	1206	Full drum
A-11	Red-brown liquid/sludge	1203	~ 3/4 full drum
A-12	Empty	1205	
A-13	Light beige liquid	1201	~ 1/2 full drum
B-1	Gray liquid	1423	Full drum
B-2	Clear brown liquid	1107	Full drum
B-3	Gray-brown liquid	1109	Full drum
B-4	Empty	1110	
B-5	Empty	1111	
B-6	Amber liquid	1112	Full drum
B-7	Solid	1114	1" in bottom of drum

Drum No.	Description	Time	Comments
B-8	Clear liquid	1426	Full drum, phenolic odor
B-9	Cloudy white liquid	1104	Full drum, drum labeled Fatty Acid Products
B-10	Clear green liquid	1120	Full drum
B-11	Solid	1138	Full drum
B-12	Light brown liquid	1102	~ 1/5 full, leaky drum - liquid pumped into new 55 gallon drum
B-13	Clear liquid/suspended solids	1429	~ 3/4 full drum, uncharacterizable odor
B-14	Beige liquid	1125	Full drum, replaced bung
B-15	Clear green liquid	1143	Full drum
B-16	Bilayer - Oily brown liquid/Clear liquid	1100	Full drum
B-17	Clear green liquid	1148	Full drum
B-18	Clear green liquid	1057	~ 3/4 full drum
B-19	White liquid	1152	Full drum
B-20	Semi-solid, rust colored	1054	Full drum
B-21	Brown fuming liquid	1051	~ 3/4 full drum
B-22	Brown liquid	1029	Full drum
B-23	Semi-clear liquid	1231	Full drum, leaking at top, over-packed into 85 gallon drum
B-24	Semi-solid, oily	1045	Full drum
B-25	Light brown, viscous liquid	1225	~ 3/4 full drum, leaking at the side, overpacked into 85 gallon drum

Drum No.	Description	Time	Comments
B-26	Empty	1139	
B-27	Empty	1140	
B-28	Empty	1141	
B-29	Dark brown liquid	1145	Full drum
B-30	Empty		
B-31	Debris, resin	1159	~ 1/2 full drum
B-32	Clear brown liquid	1420	~ 1/2 full drum, leaking, pumped into new 55 gallon drum
C-1	Empty	1235	
C-2	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1305	Full drum
C-3	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1306	Full drum
C-4	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1307	Full drum
C-5	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1308	Full drum
C-6	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1309	Full drum
C-7	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1310	Full drum

Drum No.	Description	Time	Comments
C-8	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1311	Full drum
C-9	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1312	Full drum
C-10	Empty	1313	
C-11	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1314	Full drum
C-12	Empty	1315	
C-13	Empty	1316	
C-14	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1317	Full drum
C-15	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1318	Full drum
C-16	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1319	Full drum
D-1	Brown liquid, suspended solids	1321	~ 1/2 full drum, leaking, pumped into new 55 gallon drum
D-2	Empty	1322	
D-3	Empty	1323	
D-4	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1324	Full drum

Drum No.	Description	Time	Comments
D-5	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1325	Full drum
D-6	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1326	Full drum
D-7	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1327	Full drum
D-8	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1328	Full drum
D-9	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1329	Full drum
D-10	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1330	Full drum
D-11	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1331	Full drum
D-12	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1332	Full drum
D-13	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1333	Full drum
D-14	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1334	Full drum
D-15	Empty	1335	
D-16	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1336	Full drum

Drum No.	Description	Time	Comments
D-17	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1337	Full drum
D-18	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1338	Full drum
D-19	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1339	Full drum
D-20	Brown liquid	1359	Full drum
D-21	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1340	Full drum
E-1	Oil/liquid (water)	1345	~ 3/4 full drum
E-2	Oil/liquid (water)	1346	~ 3/4 full drum
E-3	Oil/liquid (water)	1347	~ 3/4 full drum
E-4	Oil/liquid (water)	1349	~ 3/4 full drum
E-5	Oil/liquid (water)	1351	~ 3/4 full drum
E-6	Oil/liquid (water)	1355	~ 3/4 full drum
E-7	Waste Oil/debris	1402	~ 3/4 full drum

DRUM SAMPLE HAZARDOUS CHARACTERIZATION RESULTS

LABORATORY INVENTORY

PANNUTTI/PROTOMOLD

LABORATORY INVENTORY

10/27/87

PROJECT NO. 480017.01.05.02

LAB INVENTORY
PANNUTTI/PROTO MOLD
10/27/87
PROJ. NO. 480017.01.05.02

CONTAINER #	SIZE	AMT. IN CONTAINER	CONTENTS
LIQUIDS:			
1	1 Gal	1 Pt	28% AMMONIA
2	1 Gal	1 Pt	FRESHENER BASE
3	1 Gal	3 Pts	25% AMMONIA
4	1 Pt	1 Pt	AUTO POLISH
5	16 oz	8 oz	88% NaOH
6	1 Gal	1/2 Gal	SPHAGHNUM SOL'N
7	16 oz	25 ml	PINE OIL
8	16 oz	150 ml	GLYCERINE
9	16 oz	10 ml	PINE OIL
10	16 oz	500 ml	OLEIC ACID
11	16 oz	10 ml	NACCANOL SL 60
12	16 oz	25 ml	NACCANOL SL 60
13	16 oz	14 oz	CO 450
14	16 oz	8 oz	BUTYL ACETATE
15	16 oz	7 oz	ISOPROPANOL 99%
16	16 oz	3 oz	ISOPROPANOL/NAPHTHALENE
17	16 oz	6 oz	BENZALDAHYDE (CRYSTAL)
18	32 oz	4 oz	THINNER (KETONE/ PETRO DISTILLATE)
19	16 oz	3 oz	NAPHTHALENE/MINERAL SPIRITS
20	16 oz	2 oz	COLLOSIZE WSLM
21	16 oz	<1 oz	POLYOXYTHYLENE NONYPHENOL NIW
22	16 oz	2 oz	BORIC ACID SOL'N
23	16 oz	6 oz	BORAX SOL'N 5%
24	16 oz	<1 oz	CO-530/SANTOPHEN
25	16 oz	2 oz	CRYSTAMET
26	16 oz	9 oz	ETHYLENE GLYCOL/BORAX SOL'N
27	16 oz	8 oz	PERMA-KLEER G 42
28	16 oz	14 oz	IGEPAL CO-990 50%
29	16 oz	8 oz	SANTOPHEN/NI-W 10% SOL'N
30	16 oz	7 oz	CO 430
31	16 oz	12 oz	HEMISODIUM PHOSPHATE 5%
32	1/2 Gal	10 oz	BUTYL CELLOSOLVE
33	1 Gal	1/2 Gal	CELLOSIZE
34	1 Gal	3/4 Gal	HYPO SOL'N 2-3 gm Ag/l

PSH:0044/01198

	35	1/2 Gal	1/2 Gal	BROOKS FILM FIXER
	36	1/2 Gal	1/2 Gal	BROOKS FORMULA 76 FILM DEVELOPER
	37	24 oz	24 oz	TY-D-BOL
	38	16 oz	16 oz	TY-D-BOL
	39	24 oz	24 oz	TY-D-BOL
	40	16 oz	12 oz	TY-D-BOL
	41	24 oz	12 oz	TY-D-BOL
	42	16 oz	8 oz	TY-D-BOL
	43	1 lb	aerosol cans	MOLD RELEASE
	44	1 lb	aerosol cans	MOLD RELEASE
	45	1 lb	aerosol cans	MOLD RELEASE
	46	16 oz	16 oz	UNKNOWN
	47	16 oz	8 oz	UNKNOWN
	48	1/2 Gal	1 1/2 qt	UNKNOWN
	49	32 oz	16 oz	UNKNOWN
	50	1 Gal	3/4 Gal	UNKNOWN
SOLIDS:	51	500 ml	20 gm	KOH
	52	1/2 Gal	2/3 Gal	TETRASODIUM EDTA
	53	Plastic Bag	1 lb	MIC 201
	54	1/2 Gal	2/3 Gal	TETRASODIUM PYROPHOSPHATE
	55	1/2 Gal	1/6 Gal	BORIC ACID
	56	1/2 Gal	1/8 Gal	BORAX POWDER - 10 H_2O
	57	1/2 Gal	1/8 Gal	IGEPAL - CO - 990
	58	1/2 Gal	1/8 Gal	OG - POWDER PHASE
	59	1/2 Gal	1/6 Gal	BORAX - ANHYDROUS
	60	1/2 Gal	1/4 Gal	MONOSODIUM PHOSPHATE
	61	1/2 Gal	1/4 Gal	BORAX - GRANULAR
	62	1/2 Gal	1/8 Gal	VITROKLEEN #33
	63	1/2 Gal	1/6 Gal	VITROKLEEN #20
	64	5 lb	2 lb	ALUMINUM AMMONIUM SULFATE
	65	16 oz	5 oz	SPRAY & CLEAN #4
	66	100 g	100 gm	1,8 NAPHTHALIC ANHYDRIDE
	67	1 Gal	1/2 Gal	OXYTRICARB... ACID
	68	1 Gal	1/2 Gal	OXALIC ACID - 2 H_2O
	69	1/2 Gal	1/8 Gal	SLUG POWDER #7
	70	1 lb	1 lb	POTASSIUM HYDROXIDE
	71	1 lb	1 lb	POTASSIUM HYDROXIDE
	72	1 lb	1 lb	ALUMINUM CHLORIDE
	73	1 lb	1 lb	ALUMINUM CHLORIDE
	74	1 lb	1 lb	ALUMINUM CHLORIDE
	75	1 lb	1 lb	ALUMINUM CHLORIDE
	76	1 lb	1 lb	ALUMINUM CHLORIDE
	77	1/2 Gal	1/4 Gal	SPRAY & CLEAN #31
	78	1/2 Gal	1/10 Gal	NAPHTHALENE 100%
	79	50 gm	20 gm	PETERSON'S FORMULA #11
	80	Cardboard box		SOLID TOILET BOWL CLEANER
MISC.	81	8 oz	4 oz	BO-720 EMULPHOGENE

PSH:0044/01198

82	8 oz	3 oz	BO-840 EMULPHOGENE
83	8 oz	8 oz	HAPPY JON SM CONC. #12
84	8 oz	3 oz	NACCONOL 60S/FGND
85	1/2 Gal	2 oz	CO530 & SILICONE
86	16 oz	3 oz	RUBA DUB DUB
87	500 ml	150 ml	DOWACIDE
88	16 oz	<1 oz	COT 2%
89	16 oz	6 oz	PROPYLENE GLYCOL
90	16 oz	4 oz	PROPYLENE GLYCOL/ MONOBUTYL ETHER
91	16 oz	8 oz	Mg Si P_6
92	16 oz	16 oz	CHLOROSTOP NaCl SOL'N
93	16 oz	8 oz	YELLOW D&C (URANINE)
94	16 oz	3 oz	2% HYDROWET
95	16 oz	<1 oz	CELLOSIZE
96	16 oz	3 oz	COCO BASE SOAP
97	16 oz	9 oz	2% SANTOMERSE #1
98	16 oz	9 oz	CNC SOL'N
99	16 oz	<1 oz	VARNISH/PAINT REMOVER
100	16 oz	7 oz	DISTILLED H_2O
101	16 oz	1 oz	PINE OIL
102	16 oz	3 oz	REFINED NAPHTHALENE
103	16 oz	3 oz	CONC. GLASS CLEANER
104	16 oz	1 oz	CARBITOL
105	16 oz	1 oz	AQUAWET
106	16 oz	1 oz	METHYL SAL/ISOPROPYL/NIW
107	16 oz	1 oz	TWA..?... 20

PSH:0044/01198

MASTER SAMPLE LOG

PANNUTTI/PROTOMOLD
HAZARD CHARACTERIZATION RESULTS
10/28/87
PROJECT NO. 480017.05.02

	FLAMMABILITY GX-3A&LEL	COMBUSTABILITY	CHLORINATED	SPECIFIC GRAVITY	WATER REACTIVITY	WATER SOLUBILITY	pH, S.U.	OXIDENT	CYANIDES	SULFIDES	COMMENTS
um B-18	0%	Negative	Negative	Lighter than water	Negative	Total	14	Negative	Negative	Negative	Single layer, green liquid, no sludge, no solids.
um B-3	5%	Negative	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Bilayer, light gray liquid over brown liquid.
um B-25	0%	Positive	Negative	Lighter than water	Negative	Insoluble	7	Negative	Negative	Negative	Amber gel, vasoline like
um B-12	0%	Negative	Negative	Lighter than water	Negative	Total	12	Negative	Negative	Negative	Single layer/brown liquid
um B-6	20%	Positive	Negative	Equal to water	Negative	Total	9	Negative	Negative	Negative	Single layer/brown liqu d
um B-2	0%	Positive	Negative	Heavier than water	Negative	Total	3-4	Negative	Negative	Negative	Single layer, ght orange liquid.
um A-3	0%	Negative	Negative	Lighter than water	Negative	Total	Unknown	Negative	Unknown	Negative	Bi-layer, dark blue over light blue liquid
m A-7	0%	Negative	Negative	Lighter than water-Top layer Equal to water-Bottom layer		Partial	7	Negative	Negative	Negative	Bi-layer, brown oil over smokey liquid.
A-8	40%	Positive	Negative	Split-some heavier some lighter than water	Negative	Isoluble	5	Negative	Negative	Negative	Single layer, redd sh liquid with suspended solids
Composite	0%	Negative	Negative	Lighter than water	Negative	Total	9	Negative	Negative	Negative	Single layer solid, creamy colored.
6	5%	Negative	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Single layer/brown sludge
4	100%	Positive	Negative	Heavier than water	Negative	Insoluble	6	Negative	Negative	Negative	Single layer/reddish sludge.

rum D-20	0%	Negative	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Bi-layer, light brown over dark brown liquid.
rum B-14	0%	Negative	Negative	Equal to water	Negative	Total	7	Negative	Negative	Negative	Single layer, egg shell colore liquid.
mposite E	0%	Positive	Negative	Heavier than water	Negative	Insoluble	6	Negative	Negative	Negative	Bi-layer, dark oil over stained clear liquid.
um B-1	0%	Negative	Negative	Lighter than water	Negative	Partial	7	Negative	Negative	Negative	Single layer/grey liquid.
um B-13	40%	Positive	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Single layer, light amber liquid.
um B-29	0%	Positive	Negative	Heavier than water	Negative	Insoluble	4	Negative	Negative	Negative	Bi-layer, brown over light amber liquid.
um B-20	0%	Positive	Negative	Heavier than water	Negative	Insoluble	4	Negative	Negative	Negative	Bi-layer, dark brown over light brown liquid.
um B-23	5%	Negative	Negative	Equal to water	Negative	Total	7	Negative	Negative	Negative	Single layer/cloudy liquid.
um B-16	0%	Positive	Negative	Heavier than water	Negative	Partial	7	Negative	Negative	Negative	Bi-layer,amber over light amber liquid.
um A-11	0%	Negative	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Single layer, reddish brown liquid.
um B-9	0%	Negative	Negative	Lighter than water	Negative	Total	14	Negative	Negative	Negative	Single layer, cloudy liquid.

ld pH on this sample could not be determined, due like substance made pH paper unreadable.
ld composite of drums C-4, D-9, C-11 all labeled sodium perborate tetrahydride.

ENCLOSURE 1

MASTER SAMPLE LOG

MASTER SAMPLE LOG

PANNUTTI/PROTOMOLD

ITC PROJECT NO. 480017

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	RESULTS
SA-E-1	Drums	Liquid/Sludge Lab Composite of Drums A-4, A-8, A-10, A-13, B-2, B-3, B-13, B-22, B-23, D-1	Predisposal Analysis	See page 1 of enclosure 2
SA-B-22	Drums	Liquid/Sludge Lab Composite of Drums A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3, and Composite E (Field Composite of E-2, E-4, E-5, E-6, E-7)	Predisposal Analysis	See page 2 of enclosure 2
SA-B-25	Drums	Semi-Solid Lab Composite of Drums A-11, B-1, B-8, B-9, B-10, B-12, B-14, B-15, B-17, B-18, B-19, B-32, D-20	Predisposal Analysis	See page 3 of enclosure 2
SA-C-4	Drums	Solid Field Composite of Drums C-4, C-11, D-9 Labeled Sodium Perborate Tetrahydrate. Representative of 28 Drums.	Predisposal Analysis	See page 4 of enclosure 2
SA-B-21	Drums	Fuming Liquid	Predisposal Analysis	See page 5 of enclosure 2
03101225	Drum E-3	Oil/Sludge	Polychlorinated Biphenyls	See page 6 of enclosure 2
03101230	Drum E-1	Oil/Sludge, Field Composite of E-1, E-2, E-4, E-5, E-6, E-7	Polychlorinated Biphenyls	See page 6 of enclosure 2

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	RESULTS
03110255	Area E	Discolored Surface Soil, 4 to 1 Field Composite	Polychlorinated Biphynyls	See page 6 of enclosure 2
03101330	Area B	Soil 4' to 4'6" Depth, 2 to 1 Field Composite	Phenols	See page 6 of enclosure 2
03151135	Drum B-2	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151215	Drum B-23	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151220	Drum D-1	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151155	Drum A-8	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151205	Drum B-3	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151235	Drum B-22	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151145	Drum A-4	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151230	Drum A-10	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151200	Drum B-6	Liquid/Sludge	Phenols	See page 7 of enclosure 2
P04061100	Area A	Surface Soil 4 to 1 Field Composite	Phenols	See page 8 of enclosure 2
P04061110	Area B	Surface Soil 4 to 1 Field Composite	Phenols	See page 8 of enclosure 2

ENCLOSURE 2

ANALYTICAL RESULTS

ANALYTICAL RESULTS

Gibson [illegible] — Attn - [illegible]

IT CORPORATION
ANALYTICAL REPORT

WORK ORDER # M7-12-023
JOB # 89960
SAMPLE # 01 OF 1

Generator name: IT-FAS MARTINEZ
Waste description: SA-E-1 LIQUIDS
Generating Process: PANNUTTI/PROTO MOLD
Volume / frequency: NA

TEST	RESULT	UNITS
HCVP	2200	ppm
DENSITY	950	G/L
PH	7.0	pH
NORMALITY	<0.1	N
SON	0	%
CN	ND @ 5	ppm
SULFIDE	*ND @ 2	ppm
FORMALDEHYDE	300	ppm
AMMONIA	<200	ppm
FLUORIDE	NA	ppm
XS OXIDANT	ND	
FLASHPOINT	22	DEG/C
AQUEOUS	20	%
SOLID	22	%
OIL	30	%
POLAR	14	%
NONPOLAR	14	%
HALOGENATED	*	
PHENOL	*	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	ND 1.0	mg/kg
PHENOL	* 3400	mg/l
CRESOL	NA	ppm
HALOGENATED	* 960	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Be	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Ba	ND @ 1.0	ppm
Cu	ND @ 10	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

Composite of SA #: A-4, A-9, A-10, A-13, B-2, B-3, B-6, B-17, B-22, B-23, D-1.
* Sulfide in oil= ND.

* Hg by cold vapor

LAB MANAGER: [signature] DATE: 8 Dec 87

==========

ACCEPT/REJECT: _____ REASON: _____
TSDF MANAGER: _____ DATE: _____
TSD FACILITY: _____ SPECIAL SCHEDULING REQ.: _____

TREATABILITY / PLACEMENT :

White - Data Mgmt. Yellow - Operations Pink - Sales

IT CORPORATION
ANALYTICAL REPORT

WORK ORDER # M7-12-021
JOB # 89958
SAMPLE # 01 OF 1

Generator name: IT-FAS MARTINEZ
Waste description: SA-B-22 LIQUIDS
Generating Process: PANNUTTI/PROTO MOLD
Volume / frequency: NA

TEST	RESULT	UNITS
HCVF	0	ppm
DENSITY	1000	G/L
PH	5.4	pH
NORMALITY	.3	N
SON	ND	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
XS OXIDANT	ND	
FLASHPOINT	47	DEG/C
AQUEOUS	25	%
SOLID	22	%
OIL	50	%
POLAR	2	%
NONPOLAR	ND	%
HALOGENATED	ND	
PHENOL	*	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	1.3	mg/kg
PHENOL	* ND<25	ppm
CRESOL	NA	ppm
HALOGENATED	* ND<25	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Be	ND @ 1.0	ppm
Cu	ND @ 10	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

COMPOSITE OF SA #: A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3, & Composite E.

* Hg by cold vapor

LAB MANAGER: [signature] DATE: 8 Dec 87

==========

ACCEPT/REJECT: _____ REASON: _____
TSDF MANAGER: _____ DATE: _____
TSD FACILITY: _____ SPECIAL SCHEDULING REQ.: _____

TREATABILITY / PLACEMENT :

IT CORPORATION
ANALYTICAL REPORT

WORK ORDER # M7-12-020
JOB # 89957
SAMPLE # 01 OF 1

Generator name: IT-FAS MARTINEZ
Waste description: SA-B-25 SEMI SOLID
Generating Process: PANNUTTI/PROTO-MOLD
Volume / frequency: NA

TEST	RESULT	UNITS
HCVP	40	ppm
DENSITY	1090	G/L
PH	11.9	pH
NORMALITY	0.6	N
SON	0	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
X2 OXIDANT	SLIGHT	
FLASHPOINT	NA	DEG/C
AQUEOUS	95	%
SOLID	5	%
OIL	TRACE	%
POLAR	ND	%
NONPOLAR	ND	%
HALOGENATED	ND	
PHENOL	ND @ 5	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	NA	mg/kg
PHENOL	NA	ppm
CRESOL	NA	ppm
HALOGENATED	* ND @ 25	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 1	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Be	ND @ 1.0	ppm
Cu	ND @ 10	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

COMPOSITE OF SAMPLE # A-11.
B1,8,9,10,12,14,15,17,18,19.
D2 & D20.

* Hg by cold vapor

LAB MANAGER: [signature] DATE: 12-10-87

ACCEPT/REJECT: _____ REASON: _____
TSDF MANAGER: _____ DATE: _____
TSD FACILITY: _____ SPECIAL SCHEDULING REQ.: _____

TREATABILITY / PLACEMENT :

B

IT CORPORATION

IT ANALYTICAL SERVICES

836 Warren Way • [illegible] 94553 • 415 229 5100

Y-89959.T

CERTIFICATE OF ANALYSIS

Jim Reid — January 8, 1988

RE: IT FAS - Pannutti/Protomold — Sodium perborate tetrahydrate drums

SA #C4

SPT Composite from C-4, D-9, C-11 — M7-12-022

12/02/87	480017.01.05.03	89959

B

TEST	RESULT	UNITS
HCVP	30	ppm
DENSITY	1000	G/L
PH	9.6	pH
NORMALITY	NA	N
SON	NA	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
XS OXIDANT	SLIGHT	
FLASHPOINT	NA	DEG/C
AQUEOUS	ND	%
SOLID	100	%
OIL	ND	%
POLAR	ND	%
NONPOLAR	ND	%
HALOGENATED	ND	
PHENOL	ND @ 5	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	NA	mg/kg
PHENOL	NA	ppm
CRESOL	NA	ppm
HALOGENATED	NA	

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Be	ND @ 1.0	ppm
Cu	30	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

NO FREE LIQUIDS

SA # C4 - Composite of C4, D-9, C-11

* Hg by cold vapor

[illegible] that this report truly represents the testing of [illegible] performed by me or under my direct supervision

Rhonda Biederman
Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

IT CORPORATION

IT ANALYTICAL SERVICES

896 W. [illegible] • Martinez, California 94553 • 415-[illegible]

Y-85958A.TX
01/08/88

CERTIFICATE OF ANALYSIS

Jim Reid

January 8, 1988

RE: IT FAS - Pannutti/Protomold
Sa # B21

M7-12-022

12/02/87 | 480017.01.05.03 | 89959

TEST	RESULT	UNITS
HCVP	0	ppm
DENSITY	NA	G/L
PH	12.5	pH
NORMALITY	9	N
SON	ND	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	<200	ppm
FLUORIDE	NA	ppm
NS OXIDANT	POS.	
FLASHPOINT	NA	DEG/C
AQUEOUS	>98	%
SOLID	~2	%
OIL	ND	%
POLAR	ND	%
NONPOLAR	ND	%
HALOGENATED	*	
PHENOL	ND @ 5	ppm

COMMENTS

METALS - Fuming on exposure to open air - reacted vigorously with strong acid
SA # B21

* Hg by cold vapor

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	NA	mg/kg
PHENOL	NA	ppm
CRESOL	NA	ppm
HALOGENATED	* ND<25	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	NA	ppm
As	NA	ppm
Hg	NA	ppm
Se	NA	ppm
Pb	NA	ppm
Cd	NA	ppm
Ni	NA	p
Cr	NA	ppm
Cr+6	NA	ppm
Be	NA	ppm
Cu	NA	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	NA	ppm

Rhonda Biederman
Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

896 Waterbird Way • Martinez, California 94553 • 415-228-5806

CERTIFICATE OF ANALYSIS

Prepared For: Jim Reid

Date: March 17, 1988

RE: Pannutti/Protomold

M8-03-064

Date Received:	P O Number.	Job Number
03/11/88	480017.01.01	90354

We received two liquid & 2 soil samples for the following analysis. The results are as follows.

ORGANICS ANALYSIS
METHOD 8080
PCBs

COMPOUND	03101225 DRUM E-3	03101230 DRUM E-1	DETECTION LIMIT	03101255 AREA E	DETECTION LIMIT	UNIT
Arochlor-1016	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1221	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1232	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1242	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1248	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1254	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1260	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg

ANALYSIS	03101330 AREA B	UNIT	METHOD:
Phenols	ND<1	mg/kg	8040

I certify that this report truly represents the finding of work performed by me or under my direct supervision

Rhonda Biedermann
Analytical Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

Approved by the California State Department of Health

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

896 Waterbird Way • Martinez California 94553 • 415-228-5806

CERTIFICATE OF ANALYSIS

Prepared For. Jim Reid

Date March 22, 1988

RE: Pannutti/Protomold

M8-03-082

Date Received	P O Number	Job Number
03/15/88	480017.01.01	90368

We received nine samples for the following analysis. The results are as follows.

ANALYSIS	03151135 01A	03151215 02A	03151220 03A	03151155 04A	03151205 05A	03151235 06A	UNIT
Phenols	NEG	NEG	7076	252	NEG	50	mg/l
Cresols	NEG	NEG	49947	ND<50	NEG	59	mg/l

ANALYSIS	03151145 07A	03151230 08A	03151200 09A	UNIT
Phenols	128	162	81	mg/l
Cresols	ND<50	ND<50	26	mg/l

I certify that this report truly represents the findings of [illegible] under my direction and supervision

Rhonda Biedermann
Analytical Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

Approved by the California State Department of Health

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

17605 Fabrica Way • Cerritos, California 90701 • 213-921-9831 / 714-523-9200

CERTIFICATE OF ANALYSIS

Prepared for: IT Corporation
4585 Pacheco Blvd.
Martinez, CA 94553

Attn: Jim Reed

Date: April 19, 1988

Date Received: April 7, 1988 | P.O. Number 480017 Pannutti | Job Number 45832/sds

Two (2) soil samples

The samples were analyzed for phenols using Method 420.1. The results are as follows.

Sample	Milligrams Per Kilogram Phenols
P04061100	ND<2.5
P04061110	ND<2.5

ND - This compound was not detected; the limit of detection for this analysis is less than the amount stated in the table above.

I certify that this report truly represents the finding of work performed by me or under my direct supervision

Mary Hammons

Mary Hammons
Group Leader

Reviewed and Approved

Ken Faust
Technical Director

Accredited by the American Industrial Hygiene Association

REFERENCE #3

Al Wangler:

Sahnta Lee Pannutti
154 Oak Court
Menlo Park, CA 94025
415-325-1333

TOXIC SUBSTANCES CONTROL DIVISION
10-0-40
OCT 0 2 1987
CALIFORNIA DEPARTMENT OF HEALTH SERVICES
RECEIVED
AW

September 28, 1987

Mr. Gabriel Dieb
IT Corporation, FAS
4585 Pacheco Blvd.
Martinez, CA 94553

Dear Mr. Dieb:

As per our telephone conversation on September 25, 1987, I am supplying you with as much information as I currently have available. I am still sorting through my father's records, and as I find any additional information that might be valuable to the clean-up operation, I will make it available to IT Corporation. I am sending a copy of this letter to Al Wangler at the DHS office, as well as copies of the inventory and formulations lists.

My father conducted business at 1390 Old Bayshore from approximately 1954 to 1978, first as "Panco Manufacturing" and "LAV Manufacturing," and later used a portion of the building (1976-77) as an adjunct (resin-cast framing shop) to his "Treasure House" business which was located at 305 San Antonio Court in San Jose. He also leased out the plastic shop, now occuppied by Joseph Brokowski, for several years (from about 1956-70) to Don Ottermat, now deceased, for the manufacture of cups to hold his "On Guard" solid toilet bowl cleaner, as well as miscellaneous injection-molded plastics (ie., lids for Alhambra water bottles). The main thrust of the manufacturing during those years was that of natural cosmetics, which were sold in health food stores (VAL; and Russelle Delle, manufacture taken over in 1978 by Russel Heide), and toilet bowl cleaner ("On Guard", "SanoMeter," subsequent manufacture of "On Guard" was taken over in 1968 by the AirChem Company , makers of Air Wick, 111 Commerce Road, Carlstadt, New Jersey, 07072), and miscellaneous household cleaners (Glo-Sheen Rug Cleaner, With-Eze Window Cleaner, etc.). I don't have formulations for all of these products, but the enclosed inventory list gives a pretty reliable account of what was used. Most of these chemicals, however, were probably already used up in the manufacturing process.

The front part of the building has continuously been rented out to various businesses, and since mid-1970, my father discontinued any operations at 1390 Bayshore and moved his offices to "Treasure House" at 305 San Antonio Court, which building the family still owns and rents out.

Prior to my father's purchase of the building, it was owned by "Doc" Clyde McCoy (now deceased) and was known as the "Pyro-Penn Company." His widow, Lucia McCoy can be reached at 1125 North 2nd Street, San Jose, 95112.

I have enclosed names of some of the previous employees and tennants, however I do not know if all addresses are current. Jose Benavides, jr. was his foreman much of the time, and could answer questions more accurately than anyone else, and possibly supply you with additional names if necessary. My brother, Tony (408-923-9001) may also be able to answer further questions, as he was more involved in day-to-day operations than I was.

Some of the current tennants:

Joseph Brokowski (dba ProtoMold)
FX-6 Personal Privacy [redacted]
408-288-8353 (business)

M.E Greuner (dba CBS-Construction Barricade Services) (recently filed for bankruptcy)
FX-6 Personal Privacy

POB 2777 Diamond Station
Oakland, CA 94062
FX-6 Personal Privacy

Al Leake, Jr (dba PMA)
FX-6 Personal Privacy
FX-6 Personal Privacy [redacted]
FX-6 Personal Privacy
[redacted]
(Howard Tracy is new owner of PMA as of 8/87)
FX-6 Personal Privacy

Some previous tennants were:
(addresses and phone numbers may not be current)

Ed Dillon (woodwork, and cabinetry)
FX-6 Personal Privacy

Virginia's Mirrors (1979-82)
FX-6 Personal Privacy
[redacted]

Bob Marshall (dba Marshall-Whittley Promotions) (1979-81)
FX-6 Personal Privacy
[redacted]

Eli Barrientos and Luis Torres
(dba MCS Multiple Chemical Suppliers-janitorial/cleaning supplies) (2/82-6/82)
FX-6 Personal Privacy

Delano Welding (8/84-11/84)
FX-6 Personal Privacy
[redacted]

Some of the previous employees of my father (these should all be current):

Jose Benavides, jr. (approx. 1958-75)

FX-6 Personal Privacy

Hector Benavides (approx. 1960-63)

FX-6 Personal Privacy

Jack Haynes (approx. 1973)

FX-6 Personal Privacy

Nick Alvarado (approx. 1958-64)

FX-6 Personal Privacy

Frankie Edwards (approx. 1956-65)

FX-6 Personal Privacy

Sincerely,

Sahnta Lee Pannutti

cc: Al Wangler, Ernest Nakaji

Lay [illegible] Chemical Inventory 12-30-70

1370 Bayshore Hwy, San Francisco, Calif. called up checked. Berquistes

Quantity	Description	Price	Extension		
10 Drums	Lawarine	2.00	20.00	✓	outside
50 Lbs	Tri-sodium	.15	9.00	✓	
50 Bags	Borax Anhyd	[illegible]	[illegible]	✓	
100 Lbs	Tsp.	.06	6.00	✓	20.00
104 Bags	Boric Acid	4.00	416.00	✓	9.00
200 Lbs	Nacl	.05	10.00	✓	300.00
100 Lbs.	Fuji paste Dye	1.50	150.00	✓	6.00
20 Gals.	No. 13 White oil	.60	12.00	✓	416.00
200 Lbs Less.	Propylene glycol	.25	50.00	✓	10.00
30 Lbs	Lauryl Alcohol	.40	12.00	✓	150.00
20 Lbs.	Dipheny[illegible]	.40	8.00	✓	12.00
300 Lbs.	Na silicate	.04	12.00	✓	50.00
20 Lbs.	Saccharin	.40	8.00	✓	12.00
100 Lbs.	Sodium sulphite	.04	4.00	✓	8.00
50 Lbs.	E.D.T.A. Cryst	1.90	95.00	✓	4.00
100 Lbs.	Ethyl Acetate	.10	10.00	✓	95.00
160 Lbs.	Nacl	.02	3.20	✓	10.00
100 Lbs.	Betol [illegible]	.10	10.00	✓	3.20
50 Lbs.	Oakstex 450	.40	20.00	✓	10.00
10 Bags	Hexamethylenetetramine	12.00	120.00	✓	20.00
120 Bags	Nat. P.D.	7.00	840.00	✓	120.00
200 Lbs.	Methyl salicylate	[illegible]	120.00	✓	840.00
400 Lbs	N.F.	.25	100.00	✓	120.00
50 Lbs.	Anhydrous T.L. 60	.24	12.00	✓	100.00
6 Lbs.	[illegible]	[illegible]	12.00	✓	12.00
3 Bags	Naphthol	5.00	15.00	✓	12.00
30 Lbs	Silicate Z-4141	.60	18.00	✓	15.00
10 Lbs.	Silicate 200 Plant	.60	[illegible]	✓	18.00
40 Lbs	Na NO3	.04	1.60	✓	[illegible]
100 Lbs.	G.A.F. DMI 970	.26	26.00	✓	1.60
10 Lbs.	Nitrate [illegible]	1.20	12.00	✓	26.00
50 Lbs.	2 Aminoethyl Methyl propanediol	.50	25.00	✓	12.00
10 Bags	Reclamation plastic bag	4.00	40.00	✓	25.00
			$2502.80		40.00
					$2502.80 T

Lay Stock Inventory 12-30-7[illegible]

150	Reclaimed Bottles	.01	15.00	✓	
[illegible]	[illegible]	[illegible]	[illegible]	✓	

October 2, 1957

Notes on D-Icer.
This product should not be put up in Pressurized cans as the car owner will want to use it in his Hood Jar to prevent freezing.

Tested several fromulas during the winter back East.

Formula should be a cure all. To remove Oil and Road Film, Prevent Freezing at - 10° F. and to be used directly on the Windshield to remove Ice. ADP

PROVA----D-ICER # 1 %
Glycerine ---------- 20. ---NOTE--Borax disolves in Glycerine.
Sodium Borate ---------- 5. ---Reduce to 2 instead of 5
Isopropyl 99% ----------173.
NI-W ---------- 2.
Color QS 200.

PROCEDURE
Pour Borax into Glycerine and mix well to disolve. Add Isopropyl.Add NI-W and mix well. Add color and bottle.

Results----

- -

Pellet Powder 2-15-58 Make 1600 Lbs or 45 36 Lb Batches.

Hydrowet ---------- 7.
Sulfamic Zan.--------- 4.
NaHMP Pwdr. ----------12.
$NaHCO_3$ Pwdr. ---------13.
U-50 Dye Mix--- 1 Oz. ------Note Use 2 Ozs. U-Conc to 14 Ozs.$NaHCO_3$
U-50 100% Conc 36 Lbs. for color--- Add 1.25 Oz. per 36 Lb.Batch
~~XXXXXXXXXXXXXXXXXX~~
Mix in dry mixer for about 10 minutes. Add to drums and screen when finished. Spray in addative (Aerosol 20%, Carbowax 4000 5%, Silicone Z-4141 5%,Isop.70%) at CPL. 8 Ozs per 100 Lbs. Dehydrate for one hour or two until mix is dry. Press on Rotary using 7/16 Concave Dyes. Wt. 700 mg per Tablet. ADP

Check for color by using 2.8 Grams powder to 32 Ozs. water.

Spray N Kleen GIANTS # 1 5-2-56

	Ozs.
Oxytricarballylic acid	4.00
Hydrowet DB	5.00
NaHMP Granular	6.00
$NaHCO_3$ Granular	16.00
DiChromate Powder (Potassium)	.25
	30.25 Ozs.

Mix in order written. Mix well and press pills.

Results---This formulation sticks in pill machine. Should work well when mixed with the ground powder from about 90 Lbs of #9 & #10.

Spray N Kleen Giants # 2 — Container 1½ Lbs

Hydrowet DB	5.00	6½
Oxytricarballylic acid	4.00	10
NaHMP Granular	2.00	12
NaHMP Powder	3.00	15
SALE	2.00	17
$NaHCO_3$ Granular	16.00	33½
#9 & 10 Powder	12.00	46
DiChromate Powder	.25	
	44.25	

Mix together in day mixer for about 10 Minutes. Press pills.

made 260 Lbs powder. 18 to the oz or 280 per lb. Enough for 75M Giants

NOTE---Pils pressed & sent to Blackburn wiighed 1.5 Grams each.
The new ones are to weigh 2 Grams each. ADP.

To make 50M new Giant pellets will take approximately 250 Lbs Powder.

Use this formula-----

Hydrowet DB	8.00
Oxytricarballylic acid	5.00
NaHMP powder	5.00
$NaHCO_3$	12.00
DiChromate Pwdr. --4 Ozs.	30.00
Reground Giant pellets Pwdr.	30.00
	60.00 Lbs.

Make 4 --- 60 Lb. Batches. or approx. 240. Lbs.

Results---OK- slightly slow efferv.

- -

Spray N Kleen Giants # 3 -----Wall-Kleen & For Stainless Steel-Grease Removal.
4-22-57

	Pounds.		
Oxytricarballylic acid (granular)	5.00	.30.	1.50
Hydrowet DB	8.00	.16	1.20
$NaHCO_3$ Granular	2.00	.07	.14
Uranine 50 25%, $NaHCO_3$ 75%-------1 Oz.		.10	.01
NaHMP	4.00	.15	.60
$NaHCO_3$	17.00	.07	1.19
	36.00		4.64

Make 8 36 Lb. Batches or 288 Lbs. Make pellets 2.25 Grams each or 137 Lb. or 200 per Pound of powder. Make 50,000

Results--- Color OK, Good Efferv. This is a terrific De-Greaser tablet.

NOTE--Spray N Kleen Giants # 3 Formula can be made to wiigh only 1.66 Grams or 274 per Lb of powder. The material has a low compression because of the 8 Lbs of DB in the formula.

Spray N Kleen # 27 4-9-57

Oxytri--- Anhyd	4.00
Hydrowet ---DB	3.00
K.Bichromate 50%, $NaHCO_3$ 50%	.50 - used 10 ozs.
$NaHCO_3$ Granular	2.00
NaHLP	4.00
$NaHCO_3$ Pwdr.	21.50
	35.00

Mix in Day mixer for 10 Minutes. Screen and put in Drums for Rotary press at CPL. This formula does not cause sneezing at all when mixing. ADP

Spray N Kleen # 28 4-11-57

	Grams
NaHLP pwdr	20.
DB	3.
$NaHCO_3$	12.
Uranine 50----S	35.

Note-should have some oxytri. For Faster Efferv.
THIS IS A VERY GOOD ONE. ADP

Results-- Pellet disolves fast. Swlls up and breaks up before disolving very well. Seems not to leave any film even when not wiped clean .

Spray N Kleen # 29 4-11-57

	Grams
Borax ---	8.
DB	2.
NaHLP pwdr.	15.
$NaHCO_3$	10.
Uranine 50 ------ S	35.

Results----Efferv is slow.

Spray N Kleen # 30 4-29-57

	Lbs.	Per Lb	Cost
Hydrowet DB	4.00	.16	.64
Oxytricarballylic --GRANULAR	4.00	.30	1.20
NaHLP Powder -----PWDR.	4.00	.15	.60
Uranine 50 25%, $NaHCO_3$ 75% -- 1 Oz.		.80	.05
$NaHCO_3$ Pwdr.	24.00	.07	1.68
	36.00		$ 4.17 per 36 or 11.6 ¢ per L

Mix in day mixer for 10 minutes.Screen and put in drums for rotary press at CPL. Use 7/16 Dye.Pellet weight should be .65 Grams each or 700 per Lb of powder.

Results---

Spray N Kleen # 31 5-16-57

	Lbs.		
Hydrowet DB -----Nat.Aneline.	4.00	.16	.64
Oxytricarballylic --Fine Gran.Pfizer.	4.00	.32	1.28
NaHLP Powder ---BKH	6.00	.16	.96
$NaHCO_3$---------Pwdr. --BKH.	22.00	.07	1.64
Uranine 50--25%, $NaHCO_3$ 75%--1.0z.		.80	.05
	36.00		4.57 per 36 or 12.4 ¢ Lb.

Mix in Day Mixer for 10 minutes.Screen. Put in drums for Rotary press at CPL.

Vitro Kleen # 37 9-2-55

	OZS.
Citric Acid	8.00
DB Nacc	16.00
NaHMP	20.00
$NaHCO_3$	156.00
	200.00

Color Methylene Blue 1. Gram.
Soap Green B ----- 3. Grams.

Enough for approx.10,000 Pellest.

Grind Citric in Mortar.Add ingredients of A and mix. Add Color to a portion of B and mix well, in mortar. Screen and mix well A and B. Press Pills. NOTE--Add only small part of ground broken pills to each Jar of powder as it changes compression ratio.
Results--- Disolves a little too slow.

Vitro Kleen # 38 9-5-55 #39

	OZS.	
Citric acid (ground very fine)	10.00	12.
BB Nacc	16.00	16.
NaHMP	20.00	20.
$NaHCO_3$	154.00	152.
	200.00	200.

Color Methylene Blue 1. Gram
Soap Green B------ 3. Grams

Grind Citric in Mortar or Grinder to fine flour. Add ingredients of A and mix. Add color to portion of B in mortar and mix well. Add A & B together and screen several times. Add small amount of ground pellets to this powder as too much will change compression ratio.
Results-- press very well. Efferv. ok.

Tested 2-15-57 Efferv Action is a little slow pills are Hard. off

REFERENCE #4

State of California

Department of Health Services

Memorandum

To : Files

Date : March 12, 1986

Subject: Protomold site visit 3-6-86

From : Denise Kato DK

Persons present: Tony Panutti, Denise Kato

Purpose of meeting: Determine site history and assess the number and contents, if possible, of drums on-site.

History: Panutti's father rented the property and opted to buy it in the late 1960s. His primary business there was manufacturing cosmetics. The company was known as Lav Manufacturer and sold specialty cosmetic products under the names "Lav," "Russell Dulla," and "Sanimedics." The primary compounds used in cosmetics were stearates, lanolines, "flex resin," and polyglycol. They also manufactured cleaning compounds. Panutti didn't know what compounds other than boraxes were used to make the cleaning products. He also was unaware of production rates and manufacturing specifics. I asked if there had been bad batches or disposal of hazardous wastes. Panutti said a lot of drums went to Lorenz. Bad batches were usually remixed, and they didn't usually have production problems.

The father was a chemical engineer and also did research and consulting at the site. The family also ran a small woodshop on site up to about 10 years ago. The Panutti's leased space out also. The plasterwork was down by a woman named Virginia Juarez. A lot of debris in the back yard area was left by her, according to Panutti.

Current site status: The buildings on site are currently leased by Protomold, a plastics molding company [contact: Joe Brokowski, (408)288-8353] and General Repairs California Truck Service [(408)297-9339].

The drums originally found by the Abandoned Site Project in the back yard area in December 1981 are still there. There is a lot of debris in the back including plaster, a pile of empty 5-10 gallon metal containers, including paint thinner cans, a pile of empty glass bottles, wood and metal planks and wood pallets. Dirt seems to be mounded into one big pile spread over most of the yard, which was overgrown with weeds.

There were about 52 drums. Most were in fairly good condition and shut tight with bungs. About 26 silver drums along the back fence are labelled sodium perborate tetrahydrate. One of these silver drums was open and contained a white solid that looked and smelled like shortening. About 6" of brown water, probably accumulated from rains, lay over the solid and had a pH=9 when measured with test paper.

About half the non-NaBO3 labelled drums seemed empty when shaken or tapped. Most of the non-NaBO3 drums seemed to be unlabelled. One empty drum was labelled acid. A drum in the northeast corner of the yard labelled acetone was swollen. Another unlabelled drum in the northwest corner of the yard was also swollen.

Mr. Panutti volunteered to look through old P.O.'s and other records for information on the types of chemicals used at the site which might be in the drums. He also mentioned his sister, Gina Benhken of Menlo Park, was also involved in the business and might have more information. The number he gave me to reach her was incorrect, but I later found out that she was the next to youngest member of the family and wouldn't have much information or memory of site operations.

Panutti also volunteered to open the drums at a later date so I could sample them. I said the burden was on him to find out what was in the drums. I said that if the material in the drums was really sodium perborate, he could probably treat it with water and dispose of it to the sewer, if he could get the sanitation district's approval. I said the rest of the drums would have to be characterized and handled appropriately.

REFERENCE #5

State of California — Health and Welfare Agency — Department of Health Services

Date: 5/27/87
Time: 2:45 pm
To: Mary Bosetti
From: Al Wanger

RECORD OF COMMUNICATION

☐ Discussion ☐ Field Trip
☐ Meeting ☒ Phone Call
☐ Other

Subject: PROTOMOLD

SUMMARY: I called to try to find addresses for Tony Panutti and Kenneth Potstada (Attny for Panutti family). After getting address Ms Bosetti said that property was in litigation over sale terms and closure with ERNIE NAKAGI. Apparently, Panutti's took him to court because he didn't close ~~and~~ court approved ~~[illegible]~~ sale of Protomold property over concerns of possible contamination. She mentioned that the ESTATE WOULD PICK UP THE COST OF ANY CLEANUP ACTIVITIES AT PROPERTY, (ESTATE OF ANTON PANUTTI) as approved by judge. Lawsuit is trying to make Nakagi either close deal or let someone else buy it.

She then asked about work & when it could proceed. I stated that the letters sent out (December 3 & May 18) both said that drum removal could be conducted right away but a detailed soil sampling plan would have to be submitted prior to that phase of investigation. She wanted to know if junked cars that are blocking access could be hauled away by a wrecking yard or if it had to be done by IT Corp. I said I thought it would be ok for ~~So, that would~~ a wrecking yard to do that but I would check & get back to her. She asked for a note in writing. Talked w/ Susan Solez about moving cars. Said it would probably be ok but ask DHS to for info on whether workers should ~~wear~~ wear protective

Firm: BOSETTI PROPERTIES
Address:
Tel. No. 408 996 3883

☐ Conclusions ☐ Actions taken ☐ Actions to be taken

gave because of possible hazards. Said she didn't think it would be a problem as long as they stayed away from drums. She suggested I call Chuck Atwood at IT as he was last person to visit site & ask his opinion.

Informational copies:

DHS 8254 (6/85)

REFERENCE #6

file

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
2151 BERKELEY WAY
BERKELEY CA 94704

REPORT OF HAZARDOUS SUBSTANCES
CLEANUP BOND ACT EXPENDITURE PLAN MODIFICATION

This report is respectfully submitted to the Legislature pursuant to Health and Safety Code Section 25334.5 and Section 7 of Chapter 1439, Statues of 1985.

I. Name(s) of Hazardous Waste Site(s):

Protomold

II. Nature of Update:

(a)_____ change is priority ranking of site.

(b)__X__ addition of new site to Expenditure Plan.

(c)_____ transfer of funds among sites.

(d)_____ transfer of site among listing categories.

III. Explanation of Need for Modification:

This site is proposed for addition because it has recently been transferred to a new owner and the previous owner left a number of containers on site. These containers are residuals from the cosmetics manufacturing operation that formerly occupied the site. Sampling and analysis is required to determine the type of compounds present and the extent of contamination. This is a potential Bond site.

IV. Approval of Reviewing Officer:

D. S. Kaufman for DRH 10-3-86

Regional Section Chief Date

Deputy Director Date

Chief Deputy Director Date

REFERENCE #7

OPP #86-22
APPENDIX A

REMEDIAL ACTION CERTIFICATION FORM
(Please type or print in black ink only)
Instructions for completion on reverse.

1. Site Name and Location: (Street address, County, City and Assessor's parcel number)

Proto Mold

1390 Old Bayshore Road, San Jose

Santa Clara APN: 237-06-014

A. List any other names that have been used to identify sites:

None

B. Address of site if different from above: None

C. Assessor's Parcel Numbers: None

2. Responsible Parties: (Use extra pages if necessary.)

Name: Sahnta Pannutti Name:

Title: Title:

Firm: Firm:

Address: 154 Oak Court Address:

City: Menlo Park City:

Zip: 94025 Zip:

Telephone: (415) 325-1333 Telephone: ( )

Relationship to site: such as generator, hauler, etc.

Current Landowner/Operator Sahnta Pannutti

3. Brief Description and History of the Site: (Include previous and current uses of site, a brief description of the cleanup action and concentrations of significant hazardous substances left on site) Site was identified by the Abandoned Site Program on March 31, 1982. Site was a small cosmetics and home cleaning products manufacturer. Approximately 90 drums had been left in rear portion of the site. RP conducted testing of drum contents. Phenols were the only hazardous substances detected, and were found in only a few drums. Soils were sampled for phenols, no soil contamination was discovered. Drums were disposed of offsite and phenols were sent for incineration out of state. All phases of remediation at the site were completed on July 29, 1988.

4. Type of Site: (Check appropriate response)

Included in Bond Expenditure Plan?

Yes X No ____

RCRA-Permitted Facility ____ Bond - funded ____

RCRA Facility Closure ____ RP - funded X

*NPL ____

Federal Facility ____

Other (i.e., walk-in): ____ Explain Briefly: ____

5. Size of Site: (Based on Expenditure Plan definition of size)

Small X Medium ____ Large ____ Extra Large ____

6. Dates of Remedial Action

a. Initiated 10/27/87 b. Completed 07/29/88

*Per SARA, any NPL site that is not permanently cleaned must be scheduled for a follow-up visit after 5 years to verify that cleanup measures are still satisfactory.

7. Response Action Taken on Site: (check appropriate action)

____ Initial Removal or Remedial Action (site inspection/ sampling)
_X_ Final Remedial Action
____ RCRA enforcement/closure action
____ No action, further investigation verified that no cleanup action at site was needed.

A. Type of Remedial Action (e.g. Excavation and redisposal on-site treatment): Characterization and removal of approximately 90 drums onsite. Soil sampling indicated no soil contamination.

B. Estimated quantity of waste associated with the site (i.e., tons/gallons/cubic yards) which was:

1. __ treated Amount: ____
2. __ untreated (capped sites) Amount: ____
3. _X_ removed Amount: 4000 gallons

8. Cleanup Levels/Standards

a. What were the cleanup standards established by DHS pursuant to the final remedial action plan (RAP) or workplan (if cleanup occurred as the result of a removal action (RA) or interim remedial measures (IRM) prior to development of a RAP)?
The drums were to be removed from the site; no soil contamination was found.

b. Were the specified cleanup standards met? Yes _X_ No ___

c. If "no", why not: ____

9. DHS Involvement in the Remedial Action: Please See Attachment 1

A. Did the Department order the Remedial Action?
Yes____ No_X_ Date of order ____

B. Did the Department review and approve (check appropriate action and indicate date of review/approval if done):

_X_ Sampling Analysis Procedures Date 02/09/88
_X_ Health & Safety Protections Date 10/16/87
_X_ Removal/Disposal Procedures Date 02/09/88
_X_ Removal Action Plan Date 02/09/88

C. If site was abated by a responsible party, did the Department receive a signed statement from a licensed professional on all Remedial Action?
Yes_____ No_X_ Dates (from)_____(to)_____

D. Did a registered engineer or geologist verify that acceptable engineering practices were implemented?
Yes_____ No_X_ Name_____ Date of verification_____

E. Did the Department confirm completion of all Remedial Action?
Yes_X_ No_____ Date of verification August 2, 1988
(i.e. manifest, sampling, demonstrated installation and operation of treatment)

F. Did the Department (directly or through a contractor) actually perform the Remedial Action?
Yes_____ No_X_ Name of Contractor:_____

G. Was there a community relations plan in place? Yes____ No_X_

H. Was a remedial action plan developed for this site? Yes__ No_X_

I. Did DHS hold a public meeting regarding the draft RAP ?
Yes _____ No _____X_____

J. Were public comments addressed?
Yes_____ No_X_ Date of DHS analysis and response: _____

K. Are all of the facts cited above adequately documented in the DHS files? Yes_X_ No_____

If no, identify areas where documentation is lacking _____

_____

10. <u>EPA Involvement in the Remedial Action:</u>

A. Was the EPA involved in the site cleanup? Yes____ No_X_

B. If yes, did EPA concur with all remedial actions? Yes___No___

C. EPA comments _____

_____

EPA staff involved in cleanup: _____
(Name, Title)

_____
(Address, Phone Number)

11. Other Regulatory Agency Involvement in the Cleanup Action:

Agency:	Activity:
_____ RWQCB	None
_____ ARB	None
_____ CHP	None
_____ Caltrans	None
_____ Other	None

Name of contact persons and agency: _____

_____

_____

12. Post-Closure Activities:

A. Will there be post-closure activities at this site? (e.g. Operation and Maintenance) Yes_____ No_X_

If yes, describe: _____

_____

_____

B. Have post-closure plans been prepared and approved by the Department? Yes____ No_X_

C. What is the estimated duration of post-closure (including operations and maintenance) activities? _0_____ years.

D. Are deed restrictions proposed or in place? Yes___ No_X_

If "yes" have deed restrictions been recorded with the County recorder? Yes___No___Date_____
If "no", who is responsible for assuring that the deed restrictions are recorded? _____

Who is the Division contact?_____
Name/Phone Number

E. Has cost recovery been initiated? Yes_____ No_X_

If yes, amount received $_____; _____% of DHS costs.

16. Certification of Remedial Action:

I hereby certify that the foregoing information is true and correct to the best of my knowledge.

1.	Alfred Wanner Project Manager	10/6/88 Date
2.	Susan Solar Sr. Project Manager, Site Mitigation	10/6/88 Date
3.	D. K. Dirye Unit Chief	10/13/88 Date
4.	Dwight R. Hom Regional Section Chief	10/13/88 Date
5.	[illegible] Registered Engineer/Geologist	10/13/88 Date

ATTACHMENT 1

9 A. The Responsible Party has voluntarily conducted all characterization and removal activities. The Department has not issued a remedial action order or entered into an enforceable agreement with the Responsible Party. DHS will recover all costs.

9 C,D. The Responsible Party completed a removal action which involved the removal and disposal of 90 drums, of which 8 contained phenols, under oversight by the Department. The removal action resulted in a final remediation of the site. Post-removal sampling results analyzed by a DHS certified laboratory indicated that no residual soil contamination was present.

9 G. No community relations plan was developed prior to conducting the removal action for this site because the site is situated in an industrial area and there were no known community concerns. Post-removal sampling indicated that there was no contamination at the facility.

9 H. No Remedial Action Plan (RAP) was developed pursuant to Health and Safety Code Section 25356.1(g) because the removal action resulted in a final remediation of the site.

9 I. As stated in 9G and 9H, a draft RAP was not developed and no public meetings were held.

PROTO MOLD

I. Site Information

A. Location and Type of Site

1390 Old Bayshore Highway
San Jose, CA 95112
Santa Clara

This site was used in the 1960s and 1970s to manufacture cosmetic products, cleaning compounds, plaster statues and as a chemist's research and development workshop. Currently, it is leased to a truck repair service and plastics molding company.

B. Description of Hazardous Wastes

Approximately 50 drums have been stored or buried on site. About half of these drums are labeled as sodium perborate. Contents of the other drums are unknown. A pile of empty five- and ten-gallon metal containers, including paint thinner cans, is stored on site.

C. Threat to Public Health and Environment

There may be soil contamination and a potential for ground water contamination. Sodium perborate may be stored with organic compounds; this poses a fire hazard.

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

II. Site Status

A. Status of Site Activity

Drum sampling and removal activities began in October, 1987. DHS is working with site owners and their consultants to develop a soil sampling plan to characterize the site. Soil sampling is expected to begin in early 1988.

DHS is waiting for confirmation of the court approved sale of the property requiring current site owners to pay for all costs associated with site characterization and mitigation.

B. Projected Revenue Sources

The site owners have been directed to conduct characterization activities. If they fail to complete characterization and cleanup activities, DHS will issue a remedial action order or enter into an enforceable agreement with the responsible parties. DHS has budgeted $30,000 for oversight/monitoring of cleanup efforts. DHS will recover 100 percent of direct costs plus staff costs and overhead related to the project. The responsible parties will pay all costs associatedwith remedial investigations and cleanup activities.

III. Project Completion Estimates

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

Task Group	Estimated Completion
1. Site Characterization	
a) Remedial Action Order	June 1988
b) Remedial Investigation/ Feasibility Study	March 1988
2. Remedial Action Plan	June 1988
3. Remedial Action	
a) Design	Aug. 1988
b) Implementation	Oct. 1988
c) Certification	Dec. 1988
4. Cost Recovery and/or Operation and Maintenance	
a) Cost Recovery	Dec. 1989
b) Operation and Maintenance	N/A

REFERENCE #8

te of California—Health and Welfare Agency

HAZARD[redacted] MATERIALS SAMPLE ANALYSIS REQU[redacted]

IORITY ☐
plain) _____

HML No. B1568 To B1569

RT I: FIELD SECTION

llector Denise Kato Date Sampled 3-6-86 Time _____ Hours

ctivity: ☐ Enforcement ☐ ASP ☐ H.W. Property ☒ Super ☐ Other ☐ RCRA OPT Code ☐☐☐

egion: ☐ PMS–SAC ☐ NCS–SAC ☐ NCS–FRESNO ☐ SCS–LA ☐ NCCS–BERK

OCATION OF SAMPLING:

Name Protomold Tel. No _____

Address 1390 Old Bayshore ~~[illegible]~~ Hwy, San Jose
Number Street City Zip

HML No. (Lab Only)	Collector's Sample No.	Type Of Sample*	FIELD INFORMATION
B1568	DK-Proto-01	liquid/solid	Off-white/brown liquid, solid white solid
B1569	DK-Proto-02	solid	Off-white waxy solid from drum

Analysis Requested: Na, B, pH, BNA

Chain of Custody:

	Signature	Title	Inclusive Dates
1	Denise Kato	WMS I	3-6-86 4-2-86
2	Rene Sullivan	HDD DSI7	4/2/86
3			
4			
5			

Special Remarks _____
(e.g., duplicate sample given to company, etc.)

PART II: LABORATORY SECTION

Received By Tom L Title PHC II Date 4-2-86

Sample Allocation: ☐ HML ☐ SCBL ☐ LBL ☐ Other ~~[illegible]~~ Date _____

Analysis Required Na, B, pH, ~~Boric acid extractable~~
FT/LR

*Indicate whether sample is sludge, soil, etc. Orig.—Lab. Dup.—File Trip.—Inspector

Cal[illegible]nia Department of Health Serv[illegible]s
Hazardous Materials Laboratory

HML. # B1569 ~~to~~ B1568

LABORATORY REPORT Partial

Collector's Name Denise Kato

Date Received by Laboratory 4/2/86

Sampling Location Protomold 1290 Old Bayshore Hwy, San Jose

Collector's Sample # DKProto-02

Analytical Procedures Used: FT/IR spectroscopy

Reference: HML methods

ANALYSIS RESULTS:

HML#	Collector's #	Infrared spectrum
B1569	DK Proto-02	spectrum is nearly Identical with Hand soap
B1568	DK Proto-01	same as above

Analysts' Signatures:

1. Douglas Hayward 4/9/86 date

2. _____ date

Signature of Supervising Chemist

Howard S. Okamoto 4/9/86 date

California Department of Health Services - Hazardous Materials Laboratory

California Department of Health Services
Hazardous Materials Laboratory

HML # B 1568 to B 1569

LABORATORY REPORT

Partial.

Collector's Name Denise Koto

Date Received by Laboratory 4-2-86

Sampling Location Protomold
1390 old Bayshore Hwy, San Jose, CA

Collector's Sample # DK-Proto-01 to DK-Proto-02

Analytical Procedures Used: Na by A.A. after conc HNO_3 digestion
pH by Corning pH meter 125 after calibrating it with pH 4.0, 7.0 + 10.0 buffers
Boron by Carmine method (Standard Method Book)

Reference: HML + Std. Method Book

ANALYSIS RESULTS:

HML #	Collector #	Na (ug/gm)	Boron (ug/gm)	pH	Dilution for PH
B 1568	DK-Proto-01	31000	110	9.3	(20-60)
B 1569	DK-Proto-02	56,800	650	8.8	(20-100)

Analysts' Signatures:

1. [signature] 4/30/86. date

2. _____ date

Signature of Supervising Chemist [signature] 5/1/86 date

California Department of Health Services - Hazardous Materials Laboratory

004

REFERENCE #9

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
2151 BERKELEY WAY
BERKELEY, CA 94704

March 25, 1986

Tony Panutti
1524 Santa Maria
San Jose, CA 95125

Dear Mr. Panutti:

PROTOMOLD PROPERTY, 1390 OLD BAYSHORE HWY., SAN JOSE

During your meeting with Denise Kato at the subject site, the presence of several drums suspected of containing hazardous wastes was confirmed. These drums have apparently been stored at the site since your family discontinued manufacturing processes there several years ago. This storage is a violation of Section 66508(a) of Title 22, Division 4, Chapter 30 of the California Administrative Code.

At this time the Department directs you to submit a sampling and analysis plan to characterize the contents of the drums stored on site. The plan should contain, at a minimum, the following elements:

1. An implementation schedule;
2. The methods and equipment to be used to obtain samples;
3. The methods to be used to analyze the samples;
4. A Quality Assurance/Quality Control plan for sampling and analysis;
5. The names of the person(s) or firm(s) who will be collecting and analyzing the samples;
6. A site health and safety plan; and,
7. Provisions for preparation of a report summarizing drum characterization activities and findings.

It is highly recommended that you retain the services of a company experienced in dealing with hazardous wastes to assist you in developing and implementing the plan.

Finally, your attention is directed to Section 25189 which provides for civil penalties up to $25,000 per day per violation of the Administrative Code pursuant to California Health and Safety Code Section 25189.

If you have any questions or comments, please contact Denise Kato at (415) 540-2043.

Sincerely,

Dwight R. Hoenig, Chief
Toxic Substances Control Division
North Coast California Section

cc: Sahnta Panutti
Lee Esquibel, Santa Clara County
Hazardous Materials Section

REFERENCE #10

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
2151 BERKELEY WAY
BERKELEY, CA 94704

December 3, 1986

Tony Panutti
1524 Santa Maria
San Jose, CA 95125

Dear Mr. Panutti:

PROTOMOLD, 1390 OLD BAYSHORE HIGHWAY, SAN JOSE, CA

In a letter from the Department dated March 25, 1986, you were directed to submit a plan for the sampling and analysis of drums at the subject site.

We recently learned by chance that arrangements had been made to remove the drums from the site when Marge Bosetti, the realtor handling the property, called to request information on EPA ID numbers. The removal arrangements were made without the submittal of a sampling and analysis plan, contrary to the Department's March 25th directive.

We appreciate your desire to sell the property in order to settle the estate (currently in probate) as soon as possible. However, because it is a State Superfund site, the State must be involved in characterization and cleanup work to ensure that activities are conducted properly. We cannot remove the site from the Superfund List unless we are assured that investigation and cleanup have been thorough and complete.

In the interest of expediting work on the site, we are willing to allow the removal of drums without submittal of a sampling and analysis plan, provided you agree to the following:

1. The work will be done by a company and under the supervision of an individual experienced in dealing with hazardous wastes;

2. All hazardous wastes on-site are properly identified, transported by a registered hazardous waste hauler under manifest to an unauthorized hazardous waste disposal or treatment facility;

3. Copies of all analyses and documentation of hazcatting of drum contents are provided to the Department;

4. Copies of all manifests completed to dispose of the wastes are provided to the Department;

5. An inventory of the number of drums, their contents, and where they were taken is provided to the Department;

6. At least seven days advance notice is provided to the Department prior to drum removal activities so a Department representative can be on-site to observe work;

7. All other applicable laws and regulations dealing with hazardous wastes are complied with.

Also, prior to delisting, there must be some sampling to determine whether there is any soil contamination at the site. We request that you submit a soil sampling and analysis plan to us which contains, at a minimum, the following elements:

1. Proposed sampling locations;

2. Sampling and analytical methods;

3. Rationale for selecting sampling locations and the analytical methods;

4. Chain of custody procedures;

5. Quality assurance/quality control procedures to be used for sampling and analyses.

Finally, enclosed are copies of analyses of samples taken from two drums by Denise Kato during a site visit on March 6, 1986. The results indicate that the white material in the two drums could not be sodium perborate; rather, it appears to be a compound similar to hand soap. If the entire contents of the drums are this soap-like material, it is probable they would not have to be disposed of as hazardous wastes.

If you have any questions or comments, please contact Denise Kato at (415)540-3401. Please also feel free to refer any prospective buyers of the site to Ms. Kato.

Sincerely,

Jerome R. Marcotte

Jerome R. Marcotte, Senior Waste
Management Engineer
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

JRM:dk:tmk

Enclosure

cc: See Attached List

CC MAILING LIST

Kenneth Potstada
2995 Woodside Road, Suite 400-410
Woodside, California 94062

Marge Bosetti
Bosetti Properties and Investments
10320 South De Anza Boulevard, Suite 1B
Cupertino, California 95014

Lee Esquibel
Santa Clara County Health Department
2220 Moorpark Avenue
San Jose, California 95128

Mike Rudolph
City of San Jose
Hazardous Materials Unit
#4 North 2nd Street, Suite 1100
San Jose, California 95113-1305

REFERENCE #11

INTERNATIONAL TECHNOLOGY CORPORATION

April 13, 1987

Department of Health Services
5850 Shellmound St.
Emeryville, California 94608

Attention: Robert Crandall

SUBJECT: CONTAMINANT VERIFICATION AND CLOSURE AT PROTOMOLD PROPERTY, SAN JOSE
IT PROJECT NUMBER 480017

Dear Mr. Crandall:

IT Corporation (IT) is pleased to submit this contaminant verification approach to Bosetti Properties and Investments. IT has extensive experience in all phases of remediation planning, design, risk assessment and hazardous waste management response. All verification work will be completed under the guidelines and requirements of the USEPA, California Department of Health Services, California Regional Water Quality Control Board, CAL OSHA, local agencies and IT Corporation.

BACKGROUND

The Protomold facility is located at 1380 Old Bayshore Highway, San Jose, California. In the past, this facility manufactured cosmetics and plaster castings. Facility operations have been discontinued, but a building, drums, containers and other sundry debris litters the site. IT conducted a site reconnaissance and the following was observed:

- Approximately 50 to 70 fifty-five gallon drums were stacked at various locations on the site. The majority of drums have material in them. Some of the open drums may contain rain water. Some drums appear to be under pressure and are suspect of containing acetone or other volitale substances.

- Approximately 20 five-gallon containers with D.O.T. flammable labels are scattered on the site.

- Two abandoned automobiles and other structural debris are on site blocking access to the major drum storage location. These must be removed to access the drums.

- Numerous other litter such as quantities of glass bottles are scattered around the site.

Bosetti Properties & Investments' primary objective is to have the above property certified as contamination free. The goals to meet this objective are to verify if hazardous waste contamination exists on site, assess the degree and extent of contaminants, and to remediate the problem.

SCOPE OF WORK

The work scope to meet Bosetti Properties & Investments' goals and objectives is presented in three phases:

Phase I - Environmental Investigation to Verify if Contamination Exists.
Phase II - Development of a Corrective Action Plan.
Phase III - Implementation of the Corrective Action Plan.

The environmental investigation phase will confirm if contamination exists and which specific areas are contaminated. Since Phases II and III are contingent on results from the Phase I environmental investigation, this work scope will only address itself to Phase I.

PHASE I ENVIRONMENTAL INVESTIGATION

The environmental investigation phase will be used for problem definition and

will include a thorough site investigation. IT will evaluate the condition, content and quantity of the various sized drums and containers; check for existing drainage lines and collection sumps; and identify areas of potential ground surface contamination.

Task 1 - Data Collection, Kick-Off Meeting and Data Review

An initial kickoff meeting will be held between key IT team members, and Bosetti Properties & Investments. This meeting will be held to:

- provide an initial joint site visit
- discuss overall project objectives and approach
- obtain background data and information
- discuss areas of sensitivity
- promote a cooperative attitude among project participants

All readily available background data will be reviewed to provide the basis for additional data requirements, if necessary.

Readily available data will include:

- Protomold records
- public discharge records
- assessors maps
- aerial photographs

If possible, former employees that were at the facility will be interviewed.

From the IT site reconnaissance, it is evident that some form of contamination is present on the soil surface around the drum storage areas in addition to areas around abandoned equipment and select debris areas.

Current aerial photographs of the area will also be evaluated to ascertain if a topographic map can be reproduced of the site and proximal area.

Task 2 - Prepare a Health and Safety Plan

The site visit and existing data will be the basis for the site specific Health and Safety Plan. This plan will define:

- decontamination requirements
- air quality requirements
- toxicological risks
- protective equipment requirements
- clean and contaminated zones

The site specific Health and Safety Plan will develop clear delineation of responsibilities for the on-site survey personnel. All site project work will be performed under the guidelines of the plan in accordance with applicable federal, state and local requirements. In general the Health and Safety plan will be commensurate with the site risks.

As conditions change, or if new operations are to be performed, the existing Health and Safety Plan will be modified or amended or a new Health and Safety Plan shall be developed.

Task 3 - Prepare Quality Assurance/Quality Control Plan

IT has a formal, internal Quality Assurance/Quality Control to establish policies to facilitate the implementation of regulatory requirements and to provide an internal means for control and review so that the work performed is of the highest professional standards.

The responsibility for the overall direction of the QA/QC Program rests

with IT's Corporate Director, Quality Assurance. A full-time, professional staff is responsible for maintaining the QA/QC Program and verifying its implementation through operations audits.

The program is documented in two IT Quality Manuals. The policies and procedures specified by the manuals define acceptable practices to be employed by personnel. The IT Quality Assurance Manuals are controlled documents which are considered proprietary information, but applicable documents can be supplied to regulatory agencies.

This project will be performed in conformance with applicable federal, state and contract requirements, and QA/QC Program requirements. Project objectives follow.

- Scientific data generated will be of sufficient quality to withstand scientific and legal scrutiny.

- Data will be gathered or developed in accordance with procedures appropriate for the intended use of the data.

- Data will be of documented and acceptable sensitivity, precision, accuracy, representativeness, completeness, and comparability as required by the project.

- Work will be conducted in a safe manner and in accordance with all applicable federal, state, and local laws. In addition, operations shall conform to standard construction practices for work of this type.

- A premium will be placed on the health and safety of all personnel associated with the project, as well as to the surrounding community.

- The degree and types of waste for disposal, both solid and liquid, will be assessed.

- All records will be the property of Bosetti Properties & Investment and considered confidential except where required to be made public by law.

Task 4 - Site Survey and Monitoring Location Selection

The site survey will establish a plot plan and topography. The basis for this plot plan is to:

- locate all structures and appurtenances both surface and subsurface
- locate all scattered debris and equipment
- locate accurate property lines
- illustrate on-site/off-site drainage patterns
- catalogue all drums and containers and their contents

The basic need for this survey is to locate the proposed soil monitoring locations in addition to locating clean areas for potential decontamination stations.

The topographic map of the site will be of adequate scale and contour to facilitate working engineering drawings.

Task 5 - Site Preparation/Field Monitoring/Sampling/Analysis

The Site Preparation/Field Monitoring/Sampling/Analysis task consists of the following individual elements.

Site Preparation - The site is confined within a fenced area on three sides and a building on the fourth side. There is limited space for

operations in this present condition. The following will be carried out to prepare the site for safe work conditions.

- Removal of loose debris and abandoned cars and placed in a consolidated area where it cannot hinder work operations.

- All drums that are stacked shall be safely lowered to ground level for sampling and inspection.

- All debris will be catalogued.

Field Monitoring - *Field monitoring will consist of the following:*

- The site will be checked with a metal detector to locate metal piping and subsurface storage tanks.

- Visible spill stains on soil areas will be checked with a portable HNU or Photovac meter for volatile organic carbon detection. Positive results will reflect type of laboratory test requirements.

- Drum and container contents will be checked with a Hazcat kit for compatibility.

- All drums and containers shall be labelled.

Sampling - Sampling will consist of the following:

- Compatible contents from drums and containers will be composited to reduce number of samples. For budgetary purposes, collection of 2 composite samples are assumed.

- Surface soil samples will be taken in each major visible stained area. For budgetary purposes, it is assumed that 5 stained areas will be sampled.

Analysis - Laboratory analyses will consist of the following:

- Liquid samples from drums and containers will be analyzed with a predisposal test that will illustrate the contents in a broad aspect.

- Analyses for soil samples are contingent on the Photovac meter readings. Analyses will be for volatile organics or acid and base neutrals.

Task 6 - Documentation

This task will document all aspects of Phase I including field investigations, laboratory analyses and results, soil sample locations, all data collected and the site topographic plot plan. A draft report will be prepared for Bosetti Properties & Investments review. The report will include a map delineating contaminated areas. The prime basis of the report will detail the corrective action plan. Review comments will be incorporated into the final report.

SCHEDULE

Work on Phase I of the project can begin within three days after receiving authorization to proceed. The work performance will be completed in four to five weeks. The schedules for Phases II and III are contingent upon the results of Phase I.

BUSINESS PROPOSAL

IT offers to perform the engineering services described on a time-and-material basis under the terms and conditions of the attached Professional Services Agreement. Our fees and charges will be billed at the rates described in the attached Engineering Services Rate Schedule. Charges for the professional services will be determined by multiplying the time actually spent by each individual during the project by the respective charge defined in the attached Engineering Services Rate Schedule.

Our cost estimate for performance of the services described in the work scope is based on IT's experience with similar projects and the assumptions stated herein. However, because the information presently available to us is limited, the project cost estimate should not be taken to be definitive. Our cost estimate for Phase I Environmental Investigation is broken down as follows:

Professional Engineering Services	$20,000.00
Laboratory Analyses	5,600.00
Drum Staging (Materials and Expenses)	3,300.00
Survey and Mapping	6,100.00
TOTAL	$35,000.00

Contingent on actual field conditions the above cost estimate may be somewhat lower or even higher. If in the course of project performance, IT anticipates exceeding this estimated cost, Bosetti Properties & Investment will be contacted to determine the appropriate course of action.

If you have any questions regarding the proposal, please feel free to call me at 415-372-9100.

Please return one signed copy of the Professional Services Agreement to IT if

you accept this proposal.

Sincerely,

Russell J. Enos

Russell J. Enos
Manager, FAS

AG:jaa
FAS:0814

Attachment

REFERENCE #12

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
2151 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704

COPY

March 22, 1988

Ms. Sahnta Panutti
154 Oak Court
Menlo Park, CA 94025

Dear Ms. Panutti:

SALE OF DRUMS AND LAB CHEMICALS FROM THE PROTOMOLD SITE

The staff of the Department of Health Services (the Department) has reviewed your request to sell the drums labeled Sodium Perborate Tetrahydrate and laboratory chemicals from the PROTOMOLD site. After reviewing the supporting analytical data, the Department has determined that the lab chemicals and drums of Sodium Perborate Tetrahydrate are non-hazardous and may be sold as such.

Additionally, your request during our meeting on March 7, 1988, to store the drums of Sodium Perborate Tetrahydrate at another location pending their sale is approved. Please inform the Department when you complete the sale or relocation of the lab chemicals or drums of Sodium Perborate Tetrahydrate.

If you have any questions please call me at (415) 540-2090.

Sincerely,

Al Wanger

Al Wanger
Hazardous Materials Specialist
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

cc: Jim Reid, IT Corporation

REFERENCE #13

INTERNATIONAL TECHNOLOGY CORPORATION

May 12, 1988

TOXIC SUBSTANCES CONTROL DIVISION
AW 5-124
MAY 1 3 1988
CALIFORNIA DEPARTMENT OF HEALTH SERVICES
RECEIVED

Mr. Al Wanger
Department of Health Services
2151 Berkeley Way
Berkeley, CA. 94704

Subject: Pannutti/Protomold De-listing
ITC Project No. 480017; File No. 86-0004

Dear Mr. Wanger:

This letter and enclosures are being submitted to the DHS to help expedite the "de-listing" of the Pannutti/Protomold site. As per agreement between IT Corporation and the DHS, the following action items were to be addressed for site remediation and de-listing:

Identification, analysis and disposal of chemical storage drums located on site.

Identification of sites of possible soil contamination, soil analysis, and plans for soil remediation, if necessary.

Identification and disposal of laboratory chemicals.

Removal of various commercial products remaining from past on-site manufacturing processes.

Identification, Analysis and Drum Disposal:

A topographic map of the site was prepared and the drum areas segregated into five locations. The drums were labeled and removed to a staging area. The staging area was covered with visqueen to avoid ground contamination from leaks or spillage. At the staging area, drums were visually inspected, opened, and contents described. Samples were taken from each drum using a glass thieving rod. The samples were categorized and segregated according to physical inspection. "Haz-cat" testing was performed on disparate samples. "Haz-cat" results were used as a qualitative measurement of compatability for compositing samples. The drum samples were sent to the IT Vine Hill Laboratory, composited and run through a "predisposal" suite of analyses. The "predisposal" analyses were used to determine disposal sites. The drum disposal was seperated into three categories:

FLR:0039/05128

Regional Office
4585 Pacheco Boulevard • Martinez, California 94553 • 415-372-9100

IT Corporation is a wholly owned subsidiary of International Technology Corporation

1. Incineration

Composite SA-E-1 liquids showed high levels of phenolic compounds. All drums used to make up the composite were resampled specifically for phenols and the drums which tested positive were marked for incineration. The oil containing drums from area E were sampled and analyzed for PCBs. Even though the initial predisposal sample from these drums showed 1.3 ppm PCBs, subsequent analysis specifically for PCBs was negative. Since the results were negative, it was decided that these drums would not need to go for incineration. All drums earmarked for incineration have been profiled for disposal at the ENSCO, Inc. site in El Dorado, Arkansas. These drums have been placed in 85 gallon overpack drums and are as of this date still on site. These drums wil be removed by May 20, 1988.

2. Liquid

All liquids not containing phenolics were siphoned into a vacuum truck and sent to Gibson Oil in Bakersfield, California for disposal.

3. Solids

All solids were emptied from the drums and placed in a lined bin. The drums were washed out (liquid from washout was included in the Gibson Oil disposal), crushed and placed in the bin. This waste was profiled for disposal at the Casmalia, California hazardous waste disposal site. The bin is sealed and still remains on site as of this date. The bin will be removed by May 20, 1988.

Identification of Sites of Possible Soil Contamination, Analysis, Remediation:

After discussions with the DHS, it was decided that soil samples would be taken in areas where drums containing PCBs and phenolics were found. Initially Area E was indicated for PCB testing and Area B for phenols. At the suggestion of the DHS, surficial samples were taken in Area E in spots where visual oil spillage had occured. Four surface scrapes were taken, composited in the field and analyzed for PCBs. Area B was sampled in two locations at a depth of 4' to 4'6" using a stainless steel auger. The samples were field composited and tested for phenols. Upon review of the liquid phenol analysis, it was determined that soil samples should also be taken in Areas C and D. Four surface scrapes were taken at each area and field composited. These areas were then tested for phenols. All soil sample results were negative, therefore no soil remediation is deemed necessary.

Identification and Disposal of Laboratory Chemicals:

A lab inventory was taken. With DHS approval, the estate was given permission to sell the lab contents. The contents were sold to a Mr. Ed Mesiti and removed on March 15, 1988.

Removal of Commercial Products:

The Pannutti's have removed all products of the past manufacturing processes. These items included boxes of soaps, toilet cleaners, deodorizers, etc.

Enclosed for your review are the following documents:

Enclosure 1 - Master Sample Log

Enclosure 2 - Analytical Results For All Samples

If you should have any questions or require additional information, please contact me at (415)372-9100. A full report will be issued upon completion of all disposal.

Sincerely,

James C. Reid

James C. Reid
IT Environmental Specialist

Enclosures

ENCLOSURE 1

MASTER SAMPLE LOG

MASTER SAMPLE LOG

PANNUTTI/PROTOMOLD

ITC PROJECT NO. 480017

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	RESULTS
SA-E-1	Drums	Liquid/Sludge Lab Composite of Drums A-4, A-8, A-10, A-13, B-2, B-3, B-13, B-22, B-23, D-1	Predisposal Analysis	See page 1 of enclosure 2
SA-B-22	Drums	Liquid/Sludge Lab Composite of Drums A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3, and Composite E (Field Composite of E-2, E-4, E-5, E-6, E-7)	Predisposal Analysis	See page 2 of enclosure 2
SA-B-25	Drums	Semi-Solid Lab Composite of Drums A-11, B-1, B-8, B-9, B-10, B-12, B-14, B-15, B-17, B-18, B-19, B-32, D-20	Predisposal Analysis	See page 3 of enclosure 2
SA-C-4	Drums	Solid Field Composite of Drums C-4, C-11, D-9 Labeled Sodium Perborate Tetrahydrate. Representative of 28 Drums.	Predisposal Analysis	See page 4 of enclosure 2
SA-B-21	Drums	Fuming Liquid	Predisposal Analysis	See page 5 of enclosure 2
03101225	Drum E-3	Oil/Sludge	Polychlorinated Biphenyls	See page 6 of enclosure 2
03101230	Drum E-1	Oil/Sludge, Field Composite of E-1, E-2, E-4, E-5, E-6, E-7	Polychlorinated Biphenyls	See page 6 of enclosure 2

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	RESULTS
03110255	Area E	Discolored Surface Soil, 4 to 1 Field Composite	Polychlorinated Biphynyls	See page 6 of enclosure 2
03101330	Area B	Soil 4' to 4'6" Depth, 2 to 1 Field Composite	Phenols	See page 6 of enclosure 2
03151135	Drum B-2	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151215	Drum B-23	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151220	Drum D-1	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151155	Drum A-8	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151205	Drum B-3	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151235	Drum B-22	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151145	Drum A-4	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151230	Drum A-10	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151200	Drum B-6	Liquid/Sludge	Phenols	See page 7 of enclosure 2
P04061100	Area A	Surface Soil 4 to 1 Field Composite	Phenols	See page 8 of enclosure 2
P04061110	Area B	Surface Soil 4 to 1 Field Composite	Phenols	See page 8 of enclosure 2

ENCLOSURE 2

ANALYTICAL RESULTS

IT CORPORATION
ANALYTICAL REPORT

WORK ORDER # M7-12-023
JOB # 89960
SAMPLE # 01 OF 1

Generator name: IT-FAS MARTINEZ
Waste description: SA-E-1 LIQUIDS
Generating Process: PANNUTTI/PROTO MOLD
Volume / frequency: NA

TEST	RESULT	UNITS
HCVP	2200	ppm
DENSITY	950	G/L
PH	7.0	pH
NORMALITY	<0.1	N
SON	0	%
CN	ND @ 5	ppm
SULFIDE	*ND @ 2	ppm
FORMALDEHYDE	300	ppm
AMMONIA	<200	ppm
FLUORIDE	NA	ppm
XS OXIDANT	ND	
FLASHPOINT	22	DEG/C
AQUEOUS	20	%
SOLID	22	%
OIL	30	%
POLAR	14	%
NONPOLAR	14	%
HALOGENATED	*	
PHENOL	*	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	ND<1.0	mg/kg
PHENOL	* 3400	mg/l
CRESOL	NA	ppm
HALOGENATED	* 960	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Be	ND @ 1.0	ppm
Cu	ND @ 10	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

Composite of SA #: A-4. A-8, A-10. A-13, B-2, B-3, B-6.B-13 B-22. B-23. D-1.
* Sulfide in oil= ND.

* Hg by cold vapor

LAB MANAGER: [signature] DATE: 8 Dec 87

==========

ACCEPT/REJECT: _____ REASON: _____
TSDF MANAGER: _____ DATE: _____
TSD FACILITY: _____ SPECIAL SCHEDULING REQ.: _____

TREATABILITY / PLACEMENT :

White - Data Mgmt. Yellow - Operations Pink - Sales

IT CORPORATION
ANALYTICAL REPORT

WORK ORDER # M7-12-021
JOB # 87958
SAMPLE # 01 OF 1

Generator name: IT-FAS MARTINEZ
Waste description: SA-B-22 LIQUIDS
Generating Process: PANNUTTI/FROTO MOLD
Volume / frequency: NA

TEST	RESULT	UNITS
HCVF	0	ppm
DENSITY	1000	G/L
PH	5.4	pH
NORMALITY	.3	N
SON	ND	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
X3 OXIDANT	ND	
FLASHPOINT	47	DEG/C
AQUEOUS	26	%
SOLID	22	%
OIL	50	%
POLAR	2	%
NONPOLAR	ND	%
HALOGENATED	ND	
PHENOL	*	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	1.3	mg/kg
PHENOL	* ND 25	ppm
CRESOL	NA	ppm
HALOGENATED	* ND 25	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Be	ND @ 1.0	ppm
Cu	ND @ 10	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

COMPOSITE OF SA #: A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3, & Composite E.

* Hg by cold vapor

LAB MANAGER: [signature] DATE: 8 Dec 87

==========

ACCEPT/REJECT: _____ REASON: _____
TSDF MANAGER: _____ DATE: _____
TSD FACILITY: _____ SPECIAL SCHEDULING REQ.: _____

TREATABILITY / PLACEMENT :

White - Data Mgmt Yellow - Operations Pink - Sales

IT CORPORATION
ANALYTICAL REPORT

WORK ORDER # M7-12-020
JOB # 89957
SAMPLE # 01 OF 1

Generator name: IT-FAS MARTINEZ
Waste description: SA-B-25 SEMI SOLID
Generating Process: PANNUTTI/PROTO-MOLD
Volume / frequency: NA

TEST	RESULT	UNITS
HCVP	40	ppm
DENSITY	1090	G/L
PH	11.9	pH
NORMALITY	0.6	N
SON	0	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
X2 OXIDANT	SLIGHT	
FLASHPOINT	NA	DEG/C
AQUEOUS	95	%
SOLID	5	%
OIL	TRACE	%
POLAR	ND	%
NONPOLAR	ND	%
HALOGENATED	ND	
PHENOL	ND @ 5	ppm

COMMENTS

COMPOSITE OF SAMPLE # A-11. B1,8,9,10,12,14,15,17,18,19, D2 & D20.

* Hg by cold vapor

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	NA	mg/kg
PHENOL	NA	ppm
CRESOL	NA	ppm
HALOGENATED	* ND<.25	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Be	ND @ 1.0	ppm
Cu	ND @ 10	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

LAB MANAGER: [signature] DATE: 12-10-87

==========

ACCEPT/REJECT: _____ REASON: _____
TSDF MANAGER: _____ DATE: _____
TSD FACILITY: _____ SPECIAL SCHEDULING REQ.: _____

TREATABILITY / PLACEMENT :

Yellow - Operations Pink - Sales

IT CORPORATION

ANALYTICAL SERVICES

896 Waterbird Way • [illegible] 94553 • 415 229 5100

CERTIFICATE OF ANALYSIS

Jim Reid — January 8, 1988

RE: IT FAS - Pannutti/Protomold — Sodium perborate tetrahydrate drums

Sa #C4

SPT Composite

from C-4, D-9, C-11 — M7-12-022

12/02/87 — 480017.01.05.03 — 89959

B

TEST	RESULT	UNITS
HCVP	30	ppm
DENSITY	1000	G/L
PH	9.6	pH
NORMALITY	NA	N
SON	NA	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	ND @ 15	ppm
FLUORIDE	NA	ppm
XS OXIDANT	SLIGHT	
FLASHPOINT	NA	DEG/C
AQUEOUS	ND	%
SOLID	100	%
OIL	ND	%
POLAR	ND	%
NONPOLAR	ND	%
HALOGENATED	ND	
PHENOL	ND @ 5	ppm

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	NA	mg/kg
PHENOL	NA	ppm
CRESOL	NA	ppm
HALOGENATED	NA	

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	ND @ 10	ppm
As	ND @ 10	ppm
Hg	* ND @ 2	ppm
Se	ND @ 10	ppm
Pb	ND @ 10	ppm
Cd	ND @ 10	ppm
Ni	ND @ 10	ppm
Cr	ND @ 10	ppm
Cr+6	NA	ppm
Be	ND @ 1.0	ppm
Cu	30	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	ND @ 10	ppm

COMMENTS

NO FREE LIQUIDS

SA # C4 - Composite of C4, D-9, C-11

* Hg by cold vapor

[illegible], that this report truly represents the finding of work performed by me or under my direct supervision

Rhonda Biederman
Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

Approved by [illegible] Department Head

IT CORPORATION

ANALYTICAL SERVICES

[illegible] California 94553 • 415-[illegible]

01/08/88

CERTIFICATE OF ANALYSIS

Jim Reid

January 8, 1988

RE: IT FAS - Pannutti/Protomold

Sp # C21

M7-12-022

12/02/87

480017.01.05.03

89959

TEST	RESULT	UNITS
HCVP	0	ppm
DENSITY	NA	G/L
PH	12.5	pH
NORMALITY	9	N
SON	ND	%
CN	ND @ 5	ppm
SULFIDE	ND @ 2	ppm
FORMALDEHYDE	ND @ 5	ppm
AMMONIA	<200	ppm
FLUORIDE	NA	ppm
XS OXIDANT	POS.	
FLASHPOINT	NA	DEG/C
AQUEOUS	>98	%
SOLID	~2	%
OIL	ND	%
POLAR	ND	%
NONPOLAR	ND	%
HALOGENATED	*	
PHENOL	ND @ 5	ppm

COMMENTS

METALS - Fuming on exposure to open air - reacted vigorously with strong acid

SA # B21

* Hg by cold vapor

RESULTS BY GC ANALYSIS

TEST	RESULT	UNITS
FORMALDEHYDE	NA	ppm
PCB	NA	mg/kg
PHENOL	NA	ppm
CRESOL	NA	ppm
HALOGENATED	* ND<25	mg/l

RESULTS BY IC ANALYSIS

CN	NA	ppm
SULFIDE	NA	ppm
FLUORIDE	NA	ppm
PHENOL	NA	ppm

RESULTS BY ICAP ANALYSIS

TEST	RESULT	UNITS
Tl	NA	ppm
As	NA	ppm
Hg	NA	ppm
Se	NA	ppm
Pb	NA	ppm
Cd	NA	ppm
Ni	NA	p
Cr	NA	ppm
Cr+6	NA	ppm
Be	NA	ppm
Cu	NA	ppm
Fe	NA	ppm
Co	NA	ppm
Zn	NA	ppm

[illegible] report truly represents the [illegible]

Rhonda Biederman
Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

896 Waterbird Way • Martinez California 94553 • 415 228-5806

CERTIFICATE OF ANALYSIS

Prepared For Jim Reid

Date March 17, 1988

RE: Pannutti/Protomold

M8-03-064

Date Received	P O Number	Job Number
03/11/88	480017.01.01	90354

We received two liquid & 2 soil samples for the following analysis. The results are as follows.

ORGANICS ANALYSIS
METHOD 8080
PCBs

COMPOUND	03101225 DRUM E-3	03101230 DRUM E-1	DETECTION LIMIT	03101255 AREA E	DETECTION LIMIT	UNIT
Arochlor-1016	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1221	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1232	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1242	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1248	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1254	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg
Arochlor-1260	ND<1.0	ND<1.0	1.0	ND<0.5	0.5	mg/kg

ANALYSIS	03101330 AREA B	UNIT	METHOD:
Phenols	ND<1	mg/kg	8040

I certify that this report truly represents the finding of work performed by me or under my direct supervision

Rhonda Biedermann
Analytical Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

Approved by the California State Department of Health

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

896 Waterbird Way • Martinez California 94553 • 415-228-5806

CERTIFICATE OF ANALYSIS

Prepared For Jim Reid

Date March 22, 1988

RE: Pannutti/Protomold

M8-03-082

Date Received	P O Number	Job Number
03/15/88	480017.01.01	90368

We received nine samples for the following analysis. The results are as follows.

ANALYSIS	03151135 01A	03151215 02A	03151220 03A	03151155 04A	03151205 05A	03151235 06A	UNIT
Phenols	NEG	NEG	7076	252	NEG	50	mg/l
Cresols	NEG	NEG	49947	ND<50	NEG	59	mg/l

ANALYSIS	03151145 07A	03151230 08A	03151200 09A	UNIT
Phenols	128	162	81	mg/l
Cresols	ND<50	ND<50	26	mg/l

I certify that this report truly represents the finding of work performed by me or under my direct supervision

Rhonda Biedermann
Analytical Laboratory Manager

Reviewed and Approved

Tom Cors
Data Management Supervisor

Approved by the California State Department of Health

INTERNATIONAL TECHNOLOGY CORPORATION

ANALYTICAL SERVICES

17605 Fabrica Way • Cerritos, California 90701 • 213-921-9831 / 714-523-9200

CERTIFICATE OF ANALYSIS

Prepared for: IT Corporation
4585 Pacheco Blvd.
Martinez, CA 94553

Attn: Jim Reed

Date: April 19, 1988

Date Received: April 7, 1988 | P.O. Number 480017 Pannutti | Job Number 45832/sds

Two (2) soil samples

The samples were analyzed for phenols using Method 420.1. The results are as follows.

Sample	Milligrams Per Kilogram Phenols
P04061100	ND<2.5
P04061110	ND<2.5

ND - This compound was not detected; the limit of detection for this analysis is less than the amount stated in the table above.

I certify that this report truly represents the finding of work performed by me or under my direct supervision

Mary Hammons

Mary Hammons
Group Leader

Reviewed and Approved

Ken Faust
Technical Director

Accredited by the American Industrial Hygiene Association