3. Monitored Natural Attenuation Not for Veloz Carter

Veloz Carter:

- Was not a source.
- Prior contributions to groundwater monitoring for years was more than sufficient.

4. Vapor Barrier Not for Veloz Carter

- Veloz Carter was not a source.
- The vapor barrier is related to Seventeenth Street's redevelopment plan and is not driven by the CAO.

5. Soil Excavation Not for Veloz Carter

- Veloz Carter was not a source.
- Soil issues have not even been discovered yet.
  - Related to redevelopment plan, not CAO-driven.

Veloz Carter Did Not Use TCE

TCE/PCE use at the site ceased before 1985, as acknowledged in the Board approved CAP:

2.3 Chemical Use

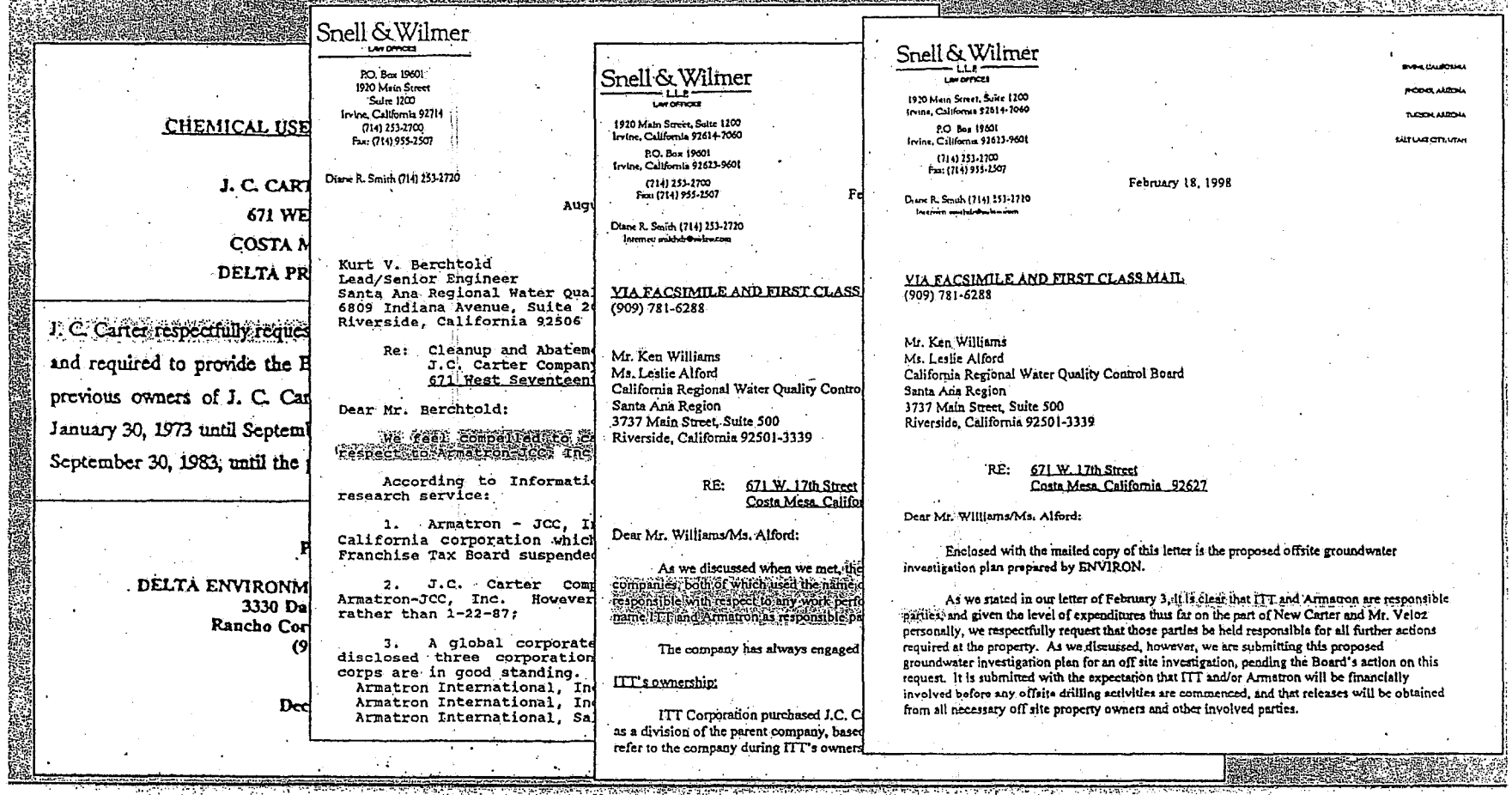
A number of chemicals, including TCE, have historically been used in the manufacture and testing of products at the Site. According to information provided by longtime employees of the Site (Beard, 2000; Petrozzi, 2000), TCE was used at the Site as a degreasing agent until sometime between 1978 and 1985. Delta (1990) reported that TCE was not used at the Site since at least 1985. There is no current TCE use at the Site (Head, 2007).

According to Delta (1990), chemicals used at the Site during the 1980s include the following:

- Aviation fuels (mainly Jet A and smaller amounts of JP-4 and JP-5).
- Diesel fuel.
- 1,1,1-trichloroethane (1,1,1-TCA).
- Various petroleum-, alcohol-, and ketone-based solvents, including Stoddard solvent, Compound 140-66, Type I Fluid, Type II Fluid, isopropyl alcohol, #600 solvent, acetone, and methyl ethyl ketone.
- Various oils, including lubricating oils, motor oils, cutting oils, and hydraulic fluids.
- Water-soluble machining coolants.
- Cryogenic liquids, including liquid nitrogen, liquid propane, and liquid butane.
- Small quantities of lubricants such as penetrating oils.

Delta (1990) reported that, based on the records reviewed, TCE and PCE were not used at the Site since at least 1985. The compound 1,1,1-TCA was used at the facility in small quantities through 1986 for cleaning pump parts. That line of business was sold in 1987, and 1,1,1-TCA has reportedly not been used at the Site since that time.

Veloz Carter Located the Responsible Parties



CHEMICAL USE

J. C. CART
671 WE
COSTA M
DELTA PR

J. C. Carter respectfully reques
and required to provide the E
previous owners of J. C. Car
January 30, 1973 until Septem
September 30, 1983, until the

DELTA ENVIRONM
3330 Da
Rancho Cor
(9

Dec

Snell & Wilmer
LAW OFFICES
P.O. Box 19601
1920 Main Street
Suite 1200
Irvine, California 92714
(714) 253-2700
Fax: (714) 955-2507

Diane R. Smith (714) 253-2720

Augu

Kurt V. Berchtold
Lead/Senior Engineer
Santa Ana Regional Water Qua
6809 Indiana Avenue, Suite 2
Riverside, California 92506

Re: Cleanup and Abatem
J.C. Carter Company
671 West Seventeen

Dear Mr. Berchtold:

We feel compelled to c
respect to Armatron-JCC, Inc

According to Informati
research service:

1. Armatron - JCC, I
California corporation which
Franchise Tax Board suspende

2. J.C. Carter Comp
Armatron-JCC, Inc. However
rather than 1-22-87;

3. A global corporate
disclosed three corporation
corps are in good standing.
Armatron International, In
Armatron International, In
Armatron International, Sa

Snell & Wilmer
L.L.P.
LAW OFFICES
1920 Main Street, Suite 1200
Irvine, California 92614-7060
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Irvine, California 92623-9601
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Diane R. Smith (714) 253-2720
Internet: smithdr@swlaw.com

Fe

VIA FACSIMILE AND FIRST CLASS
(909) 781-6288

Mr. Ken Williams
Ms. Leslie Alford
California Regional Water Quality Contro
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

RE: 671 W. 17th Street
Costa Mesa, Califo

Dear Mr. Williams/Ms. Alford:

As we discussed when we met, the
companies, both of which used the name
responsible with respect to any work perf
name J.C. and Armatron as responsible pa

The company has always engaged

ITT's ownership:

ITT Corporation purchased J.C. C
as a division of the parent company, base
refer to the company during ITT's owners

Snell & Wilmer
L.L.P.
LAW OFFICES
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Irvine, California 92614-7060
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IRVINE, CALIFORNIA
PHOENIX, ARIZONA
TUCSON, ARIZONA
SALT LAKE CITY, UTAH

February 18, 1998

VIA FACSIMILE AND FIRST CLASS MAIL
(909) 781-6288

Mr. Ken Williams
Ms. Leslie Alford
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3339

RE: 671 W. 17th Street
Costa Mesa, California 92627

Dear Mr. Williams/Ms. Alford:

Enclosed with the mailed copy of this letter is the proposed offsite groundwater investigation plan prepared by ENVIRON.

As we stated in our letter of February 3, it is clear that ITT and Armatron are responsible parties, and given the level of expenditures thus far on the part of New Carter and Mr. Veloz personally, we respectfully request that those parties be held responsible for all further actions required at the property. As we discussed, however, we are submitting this proposed groundwater investigation plan for an off site investigation, pending the Board's action on this request. It is submitted with the expectation that ITT and/or Armatron will be financially involved before any offsite drilling activities are commenced, and that releases will be obtained from all necessary off site property owners and other involved parties.

Veloz Carter Submitted Evidence to the Board Regarding the Responsible Parties

- ITT and Armatron:
  1. Used TCE and other chemicals at the site.
  2. Admittedly spilled such chemicals at the site.
  3. Were aware of the contamination.

- Evidence about the responsible parties was submitted with the Petition to Stay and Vacate the CAO.
  - Evidence includes 3 affidavits from ITT employees.