

RESPONSE TO COMMENTS FOR DRAFT CLEANUP AND ABATEMENT ORDER R4-2012-0020

Regional Board - Los Angeles Regional Water Quality Control Board
TCE - Tetrachloroethylene
USEPA - United States Environmental Protection Agency
MCLs - maximum contaminant levels
CAO - Cleanup and abatement order
SCAQMD - South Coast Air Quality Management District
1,2,3-TCP - 1,2,3-Trichloropropane
SSLs - Soil Screening levels
VOCs - volatile organic compounds
SCM - Site Conceptual Model
SGVB - San Gabriel Valley Basin
CDHS - California Department of Health Services
µg/l – micrograms per liter - µg/kg – micrograms per kilogram

No.	Author	Date	Comment	Response
	LSI / Agere <u>Introduction/ Summary</u>	09/25/12	<p>As discussed in a conference call with Regional Board staff on September 13, 2012, the issuance of a CAO to LSI/Agere Systems would be petitioned to the fullest extent possible.</p> <p>Claims that LSI/Agere is not a “discharger” under State Water Board policy and California State Law.</p> <p>No additional facts have been placed in the administrative record that show LSI caused or permitted any wastes to be discharged or deposited where the waste is or probably will be discharged into the waters of the State.</p>	Regional Board staff acknowledges comment.

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No.	Author	Date	Comment	Response
	<p><u>Introduction/Summary (Cont.)</u> LSI / Agere</p>	09/25/12	<p>For all of the reasons set forth in the 2010 Comments, LSI is not a "discharger" under State Water Board policy and California law. LSI is not a current Facility owner or a current lessee and neither LSI nor the RWQCB has identified any evidence that LSI or its subsidiaries or corporate predecessors actively discharged wastes to the soil or groundwater at the Facility. Based on the available evidence, LSI is simply a former lessee, and a former parent corporation of a former lessee. We have not identified any State Water Board opinions or California case law upholding a CAO against a former lessee that was not involved in the activity that created the pollution problem.</p>	<p><i>In re Wenwest, Inc.</i>, Order No. WQ 92-13, does not support the commenter's assertion. In that case, Wendy's International, which purchased the property to build a restaurant, did not own or operate the gas station, and was not held liable.</p> <p>In addition, Wendy's only owned the site for a few months. The State Water Board has held former lessees responsible for waste discharges. The Regional Board staff agrees that there are also other sources of wastes in groundwater and has been conducting extensive investigation to determine the sources and responsible parties for such discharges. The existence of other sources of waste does not preclude the Regional Board from naming LSI/Agere in a cleanup and abatement order where LSI leased the property and used chemicals of the type found at the site.</p>

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No.	Author	Date	Comment	Response
	<p><u>Introduction/Summary (Cont.)</u> LSI / Agere</p>	09/25/12	<p>LSI has provided substantial evidence to the RWQCB that the chlorinated solvent plume observed in groundwater beneath the site comes from an offsite up-gradient source (or sources). LSI also has provided substantial evidence to the RWQCB that the solvents and stabilizers observed in soil gas at the site, and any incremental contribution of such materials to the groundwater plume, resulted from the activities of the pre-1980 electric transformer/component manufacturers previously occupying the land that is now occupied in part by Building 2 of the Ortel facility, including but not limited to Trimas.</p>	<p>Regional Board acknowledges comment LSI/Agere and its predecessors operated and used chemicals found at the Site. Trichloroethylene has been detected in subsurface soil, soil vapor, and groundwater at the Site. A copy of a portion of a waste manifest dated and signed February 28, 1995 indicates that a waste containing TCE was generated at the Site (Attached). In addition, the National Biennial RCRA Hazardous Waste Report, based on 1997 Data, documents that the Site was designated as a large quantity generator of hazardous waste. (Attached).</p> <p>The Regional Board Issued the Draft CAO to the known tenants, current tenants, landowners, and former viable businesses for the burdened property.</p> <p>The Regional Board staff did not issue the draft CAO based on the groundwater plume emanating from an offsite up-gradient source. Soil vapor sample results collected from 6 soil vapor monitoring wells between buildings No. 5 and Building No. 6 (Figure 2. Site Map). Nested soil vapor probes (EMW-1 through EMW-6) were</p>

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1.0	<p>Discussion Comments) LSI / Agere</p>	09/25/12	<p>Mr. (Hank) Blauvelt was employed by Ortel and worked at the facility from January 1985 until September 2001. ("Ortel") at 2015 West Chestnut Street (a.k.a. Chestnut Street), Alhambra, California. Mr. Blauvelt provided a affidavit dated December 15, 2012, that primarily addressed Building 5, (711-721 South Palm Avenue), and Building 6 (718 South Date Avenue). Mr. Blauvelt stated that the only possible solvent use by Ortel in Building 5 would have been limited to the final assembly process, for the cleaning of circuit boards after the hand soldering of a small number of components (e.g., finished laser modules) to the circuit boards. To the extent that this occurred, solvent would have been applied to the circuit boards with cotton swabs or similar applicators (e.g., to remove soldering flux). The quantity of solvent stored and used in this area for this purpose</p>	<p>placed from 5 feet bgs to 50 feet bgs did not yield results that would suggest the area was a source of a discharge of VOCs to the soils. However, phases of soil vapor investigations conducted in the vicinity of groundwater monitoring well EMW-1 (located between Building No. 2 and Building No. 4) indicated VOCs in the soil vapor at concentrations and at depths that suggest a track of VOCs to the groundwater beneath the Site. The TCE wastes have been detected in the soil vapor, soil, and groundwater near EMW-1.</p> <p>Regional Board staff acknowledges comment.</p>

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No.	Author	Date	Comment	Response
1.0	LSI/Agere (Cont.)	09/25/12	<p>would have been very small. He was not aware of any reason why chlorinated solvents, rather than solvents like isopropyl alcohol or acetone, would have been used for this purpose.</p> <p>Mr. Blauvelt stated that after he had worked with Ortel for two years when the company had purchased a vapor degreaser and placed it in Building 2.</p> <p>The Law Continues to Support LSI's Position</p> <p>Paragraph 9(a) of the 2012 draft CAO makes a broad finding about the "Dischargers" and lumps them all together. No specific findings are made regarding discharges by Ortel. The 2012 draft CAO also states that the "Dischargers have, used, and/or discharged VOCs, including TCE and various solvent stabilizers, on the Site." Without more, neither storage nor use of VOCs gives rise to liability under California law for the cleanup of VOCs found in subsurface soil or groundwater. There must be some connection between the VOC storage or use and a release of VOCs to the subsurface.</p> <p>The State Water Board has never approved the issuance of a CAO to an entity solely because it is located over a groundwater plume emanating from an offsite up-gradient source or solely because it is a former lessee of property that was contaminated by an unrelated prior lessee or prior owner. Moreover, in <i>Redevelopment Agency of the City of Stockton v. BNSF Railway Company, et al.</i>, 643 F.3d 668 (9th Cir. 2011), the Ninth Circuit Court of Appeals followed <i>City of Modesto Redevelopment Agency v. Superior Court</i>, 119 Cal. App. 4th 28, 13 Cal. Rptr. 3d</p>	<p>See above response in Introduction/Summary</p> <p>The Regional Board disagrees that the Ninth Circuit Court of Appeals decision in <i>Redevelopment Agency of the City of Stockton v. BNSF Railway Co.</i> (9th Cir. 2011) 643 F.3d 668, applies to this matter. The facts and decision in that case can be distinguished from the facts in this matter. The Regional Board agrees that there is likely an up-gradient source of waste in the groundwater under the site as demonstrated by the data from EMW2, however, the Regional Board's record supports the conclusion that the Site, particularly in the area of EMW1, is a source of waste discharges and that waste remains in the soil and soil vapor. This Order has been modified to clarify that US EPA will be addressing the regional groundwater plumes. The Order focuses</p>

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2.0	LSI/Agere <u>Discussion</u> <u>Comments</u>	09/25/12	<p>865 (2004) in holding that railroads were not liable for a petroleum spill that had occurred on other property but then had migrated through a french drain constructed by the railroads.</p> <p>Certain Requirements in the Draft CAO Are Technically Unsupported and Should be Modified</p> <p>a. Sequencing of Required Actions - b. Scope of Required Actions -</p> <p>i. <u>Task 2 -Indoor Air Sampling at All Site Buildings and Adjacent Properties</u>, First, the requirement should be modified to start with the buildings in the vicinity of the highest soil gas concentrations.</p> <p>The clause referring to indoor air sampling outside at adjacent properties should be deleted. During our September 13 telephonic conference, RWOCB representatives suggested that the approach in the 2012 draft CAO may be modified to address this point as well.</p>	<p>on completing the investigation and cleanup of waste in soil and soil vapor at the site.</p> <p>The Regional Board acknowledges the comment and has modified the schedule.</p> <p>The Regional Board acknowledges the conference call dialogue on September 13th and concurs with a revised scope of work approach. Indoor air sampling could be conducted starting at the areas where VOC plumes are in close proximity to the buildings. In addition, baseline soil vapor data should be generated as part of the workplan. Past investigative data should be evaluated to provide the basis for additional delineation of the vapor concentrations as necessary.</p>

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2.0	LSU/Agere <u>Discussion</u> <u>Comments</u>	09/25/12	<p>ii. Characterization and Delineation of Contaminants in Soil. - Task 3 of the 2012 draft CAO requires delineation of "the vertical and horizontal extent of wastes onsite and offsite in the soil matrix" There has not been any showing, however, that onsite soils contain hazardous substances or pose a risk to human health or groundwater.</p> <p>iii. Task 3 of the 2012 draft CAO appears to require the delineation of various substances other than VOCs, such as TPH, heavy metals, and various emergent chemicals like NDMA and perchlorate. (But see comment 2(b)(v), below.) Based on the available site data and site use history, there is no evidence that these substances were released at the facility. Nor is there any evidence that TPH, heavy metals, NDMA, or perchlorate are present or constitute a risk in soil, soil gas, or groundwater at the site. Accordingly, the requirements in the draft CAO for delineation and remediation of these substances in soil, soil gas, and groundwater should be deleted.</p> <p>iv. Cleanup of Wastes In Groundwater, Task 4 of the 2012 draft CAO appears to require the remediation of substances in groundwater beneath the Site to levels that meet water quality objectives in the Basin Plan, including California's MCLs and notification levels for drinking water. This requirement appears to ignore the available Site data showing that the chlorinated solvent plume in groundwater beneath the Site originates at one or more offsite up-gradient</p>	<p>The Regional Board acknowledges the comment. Typically soil investigations and assessments for site closure requires a minimal number of "companion" soil and/or soil vapor samples be collected and screened for various VOCs, heavy metals, and emergent compounds depending on site specific uses.</p> <p>Regional Board staff acknowledges comment, refer to above response ii.</p> <p>Groundwater cleanup will be overseen and coordinated under the US EPA Superfund program. Regional Board staff understands that there is Regional groundwater contamination. The cleanup efforts cost, liability, are issues that would be determined as a participating "discharger" responsible in a US EPA Superfund scenario.</p>

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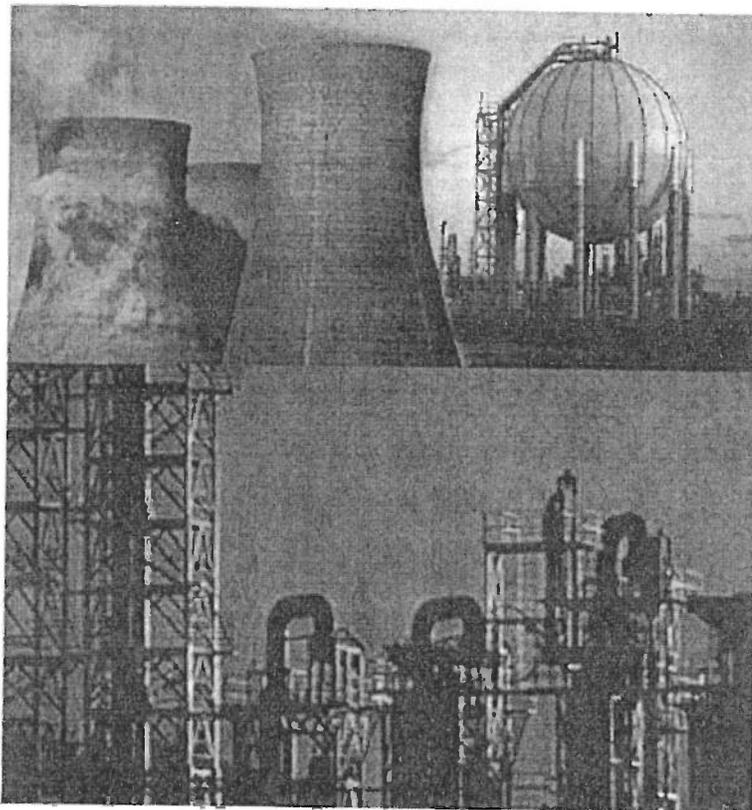
No.	Author	Date	Comment	Response
3.0	LSI/Agere	09/25/12	<p>v. sources rather than from the Site.</p> <p>v. Cleanup of Wastes in Groundwater - There is no technical basis to require persons associated with the Site to remediate this plume simply because it passes beneath the Site. (It also passes beneath many other properties, likely including properties side-gradient to the Site.) The available Site data do not support the feasibility of remediating groundwater at the Site as long as this plume continues to arrive from one or more offsite up-gradient sources. The requirement to remediate groundwater beneath the Site should be deleted from this CAO pending elimination of the plume resulting from offsite up-gradient source(s). During our September 13 telephone conference, RWQCB representatives suggested that the approach in the 2012 draft CAO may be modified to clarify that the RWQCB does not expect potentially responsible parties at the Site to address the groundwater plume emanating from more up-gradient sources.</p> <p>vi. Quarterly Groundwater Sampling - Task 5 of the 2012 draft CAO requires quarterly groundwater monitoring. As explained in the 2010 Comments, LSI performed quarterly groundwater monitoring from the first quarter of 2007 through the first quarter of 2008. Based on the consistency of the groundwater data collected during those five quarterly monitoring events, LSI requested and received approval to modify the frequency of</p>	<p>(See response iv).</p> <p>Regional Board staff agrees with the reduced frequency for groundwater monitoring based on the consistency of the past monitoring results and for feasibility sake however, if cleanup is performed and a RAP is implemented, a groundwater monitoring schedule will be considered to demonstrate the success of the remedial efforts</p>

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	LSI/Agere	09/25/12	<p>groundwater monitoring and reporting from a from a quarterly period to an annual basis.</p> <p>vii. Time schedule - The deadlines in Attachment B (Time Schedule) are infeasible, for the reasons set forth in the 2010 Comments. LSI assumes that these deadlines are "placeholder" and would be replaced by feasible deadlines if and when any final CAO were issued. LSI also notes that the required actions listed in Attachment B are not entirely consistent with the required actions set forth on pages 9-11 of the 2012 draft CAO.</p> <p>Other Factual Statements in the Draft CAO Are Incorrect.</p> <p>1. As stated in footnote 1, above, note (h) to Table 1 on page 3 of the 2012 draft CAO is incorrect, as Agere is not the current lessee of the buildings on the Property and Emcore is not currently subleasing the buildings from Agere. As of October 2005, Agere ceased leasing the facility and subleasing it to Emcore. LSI is not a current owner, operator, or lessee of the subject property. (Emcore, the lessee of the facility since October 2005, is not a predecessor or affiliate of Agere/LSI; it is an independent and unaffiliated entity.)</p> <p>2. Paragraph 7.d, Groundwater data - for 1,2,3-TCP is stated as micrograms per liter instead of nanograms per liter.</p> <p>(END OF COMMENTS)</p>	<p>Regional Board acknowledges comment and has revised schedule.</p> <p>Regional Board acknowledges comment and has revised Table 1.</p> <p>Regional Board staff has corrected units.</p>

 **EPA List of Large Quantity Generators
in the United States**

The National Biennial RCRA
Hazardous Waste Report
(Based on 1997 Data)



Printed on paper that contains at least
30 percent postconsumer fiber.

NATIONAL BIENNIAL RCRA HAZARDOUS WASTE REPORT: BASED ON 1997 DATA

CALIFORNIA

REPORTED LARGE QUANTITY GENERATORS (LQG) GROUPED BY RCRA GENERATION QUANTITIES

GENERATORS WHO REPORTED:

- AT LEAST 13.2 TONS RCRA HAZARDOUS WASTE, OR
- AT LEAST 26.4 POUNDS RCRA ACUTE HAZARDOUS WASTE, OR
- MORE THAN 220 POUNDS OF ACUTE SPILL CLEANUP MATERIAL

EPA ID	GENERATOR NAME	LOCATION CITY	RCRA TONS GENERATED	RCRA ACUTE LBS GENERATED	ACUTE SPILL LBS GENERATED
CA2170023152	NAVAL AIR WEAPONS STATION	CHINA LAKE	311.67	76.00	.00
CA9170023130	NAVAL AMPHIBIOUS BASE CORONADO, CA	SAN DIEGO	122.12	.00	.00
CA4170090456	NAVAL AUXILIARY LANDING FIELD	SAN CLEMENTE IS	17.45	.00	.00
CA2170024382	NAVAL COMMUNICATION STATION STOCKTO	STOCKTON	15.97	.00	.00
CA6170023323	NAVAL CONSTRUCTION BATTALION CENTER	PORT HUENEME	35.49	7.00	.00
CA6170024289	NAVAL STATION SAN DIEGO	SAN DIEGO	61,569.08	.00	.00
CA2170023236	NAVY TRANSITION OFFICE - ALAMEDA PO	ALAMEDA	1,262.91	6.00	.00
CA8170024261	NEBO, MCLB, BARSTOW, CA	BARSTOW	163.44	.00	.00
CAD980881510	NEC ELECTRONICS INC.	ROSEVILLE	593.12	.00	.00
CAD042138032	NELCO PRODUCTS	ANAHEIM	74.78	.00	.00
CAD981642804	NELCO PRODUCTS	FULLERTON	34.17	.00	.00
CAD008329963	NELSON NAME PLATE CO.	LOS ANGELES	26.12	.00	.00
CAD008254617	NEUTROGENA CORPORATION	LOS ANGELES	38.87	.00	.00
CAD981982721	NEUTRON PLATING, INC.	ANAHEIM	524.33	.00	.00
CAD008364150	NEVILLE CHEMICAL COMPANY	ANAHEIM	20.43	.00	.00
CAD046468195	NEW HAMPSHIRE BALL BEARING, INC	CHATSWORTH	49.06	.00	.00
CD000051433	NEW UNITED MOTOR MANUFACTURING, INC	FREMONT	1,081.30	.00	.00
CAD048456941	NORTH AMERICAN CHEMICAL COMPANY	TRONA	30.25	.00	.00
CD044367604	NORTH AMERICAN TRANSFORMER	MILPITAS	15.15	.00	.00
CA0000892232	NORTHROP GRUMMAN CORPORATION - CAD	COMPTON	24.99	.00	.00
CAD008268302	NORTHROP GRUMMAN CORPORATION - CAD	HAWTHORNE	432.88	.00	.00
CAD000627273	NORTHROP GRUMMAN CORPORATION- W. CO	EL SEGUNDO	135.46	.00	.00
CAD001864081	NORTHROP GRUMMAN MARINE SYSTEMS	SUNNYVALE	58.13	.00	.00
CAD980735302	NORTHROP GRUMMAN PICO RIVERA	PICO RIVERA	65.89	.00	.00
CAD009105958	NORTON PACKAGING, INC.	OAKLAND	30.82	.00	.00
CAD982465320	NOVACAP, INC.	VALENCIA	409.44	.00	.00
CAR000005512	NOVATO #141	NOVATO	31.09	.00	.00
CAD008259558	NT QUALITY HARDWARE	HAWTHORNE	64.80	.00	.00
CAD980818488	NU-METAL FINISHING, INC.	SANTA CLARA	62.14	.00	.00
CAT080013733	NUSIL TECHNOLOGY	CARPINTERIA	80.90	.00	.00
CAD982503328	O.C ALPHANETICS INC.	SANTA ANA	155.10	.00	.00
CAD050116995	OAKITE PRODUCTS, INC.	CITY OF INDUSTR	14.33	.00	.00
CAD009184508	OCCIDENTAL CHEMICAL CORP.	LATHROP	205.62	.00	.00
CAD087210019	ODYSSEY TRANSPORTATION, INC.	CARSON	157.47	.00	.00
CAD009559618	OEA AEROSPACE, INC.	FAIRFIELD	18.50	.00	.00
CAD981989551	OFFICE OF STATE PUBLISHING	SACRAMENTO	14.15	.00	.00
CAR000014159	OGDEN POWER PACIFIC, INC. OTAY FACI	CHULA VISTA	42.57	.00	.00
CAD029409224	OLOCCO AG SERVICES	SANTA MARIA	.10	200.00	.00
CAR000042085	ONYX PHARMACEUTICALS	RICHMOND	2.90	946.00	.00
CAD058230582	ORANGE COUNTY PLATING, CO.	ORANGE	14.34	.00	.00
CAT080012008	ORBIT SEMICONDUCTOR	SUNNYVALE	20.53	.00	.00
CAD981420557	ORCON CORPORATION	UNION CITY	33.99	.00	.00
CAR000016972	OREAD	PALO ALTO	28.02	.00	.00
CAD000631036	ORMOND BEACH GENERATING STATION	OXNARD	18.93	.00	.00
CAD038071643	ORTEL CORPORATION	ALHAMBRA	13.77	.00	.00
CAD008256562	OWENS-BROCKWAY GLASS CONTAINER	VERNON	251.46	.00	.00
CAD009151663	OWENS-BROCKWAY GLASS CONTAINER	ANTIOCH	111.48	.00	.00
CAD051903847	OWENS-BROCKWAY GLASS CONTAINER	HAYWARD	54.80	.00	.00
CAT000618918	OWENS-BROCKWAY GLASS CONTAINER	OAKLAND	47.52	.00	.00
CAD041160672	P.B. FASTENERS	GARDENA	51.35	.00	.00
CAD983647510	PACESETTER, INC. A ST. JUDE MEDICAL	SYLMAR	13.60	.00	.00
CAD063036776	PACIFIC COAST PRODUCERS CAN PLANT	LODI	233.57	.00	.00
CAT080011679	PACIFIC GAS & ELECTRIC CO. OAKLAND	OAKLAND	13.50	.00	.00
CA0000047258	PACIFIC IMAGE COMPANY	ANAHEIM	140.25	.00	.00
CAR000020057	PACIFIC PAC INTERNATIONAL, INC.	HOLLISTER	170.63	.00	.00

Note: Please refer to the introduction for an explanation of this list.

The RCRA Generation Quantities reported in this Volume were determined AFTER the wastewater quantities were removed from the total generation quantities reported by the Generator.

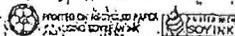
Changes to the 1997 Biennial Reporting requirements will make cursory comparisons of the 1997 National Biennial Report to earlier National Biennial Reports misleading. Refer to the Executive Summary (ES-2) for a complete explanation.

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

E0946

Form Approved, OMB No. 2050-0039; Expires 6-30-06

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. CA D 0 3 8 0 7 1 6 4 3	Manifest Document No. 1 6 2 6 0	22. Page 2 of 2	Information in the shaded areas is not required by Federal law.
23. Generator's Name Ortel Corp. 2015 W. Chestnut St. Alhambra, CA 91803-1542		25. US EPA ID Number CA0281157166		26. Transporter's US EPA ID Number CA0281157166	
24. Transporter's Company Name Findly Chemical Disposal, Inc.		25. US EPA ID Number CA0281157166		26. Transporter's US EPA ID Number CA0281157166	
26. Transporter's Company Name		27. US EPA ID Number		28. State of Origin	
GENERAL INFORMATION	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers No.	29. Containers Type	30. Total Quantity	31. Unit WUVol
	a. Waste Oxidizing Substances, Liquid, N.O.S., 5.1, UN 3139, PG II	0.0	D F	0.0	0.0
	b. Waste Poisonous Liquids, N.O.S., (Hydroquinone, Trichloroethylene), 6.1, UN 2810, PG II	0.0	D F	0.0	1.0
	c. Waste Poisonous Solids, N.O.S., (Arsenic), 6.1, UN 2811, PG II	0.0	D F	0.0	1.5
	d. Hazardous Waste, Liquid, N.O.S., 9, NA 3082, PG III	0.0	D F	0.0	0.5
32. Special Handling Instructions and Additional Information		Wear Proper Safety Equipment Keep Away From Sparks and Flames. ERG#29, 31, 32, 35, 53, 55, 60 Load# 4/18			
33. Transporter Acknowledgment of Receipt of Materials		Signature Terrence Burrell		Date 8.2.28.05	
34. Transporter Acknowledgment of Receipt of Materials		Signature		Date	
35. Discrepancy Indication Space					



ORIGINAL RETURN TO GENERATOR

AG-05336

EXHIBIT 7



April 12, 2013

Via Electronic Mail and US Mail

Mr. Curt Charmley
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

**Re: 2013 Annual Groundwater Monitoring Report
Agere Systems, a wholly owned subsidiary of LSI Corporation
2015 West Chestnut Street, Alhambra, California (Site)**

Dear Mr. Charmley:

ENVIRON International Corporation (ENVIRON) has prepared this report on behalf of Agere Systems (Agere), a wholly owned subsidiary of LSI Corporation, to describe the 2013 annual groundwater monitoring event conducted at the Site (see Figure 1) on March 11, 2013. These activities were performed pursuant to ENVIRON's work plan entitled "Final Work Plan for Groundwater Monitoring Wells, 2015 West Chestnut Street, Alhambra, California," dated June 26, 2006, and the Los Angeles Regional Water Quality Control Board (LARWQCB) letter "Requirement for a Technical Report, Pursuant to California Water Code Section 13267-Agere Systems, 2015 West Chestnut Avenue, Alhambra, California (File No. 115.0003)," dated March 20, 2007 with one exception: groundwater monitoring has been conducted annually rather than quarterly, beginning in 2008.

Background

The Site is located within the United States Environmental Protection Agency (USEPA) designated San Gabriel Valley Area 3 Superfund Site. The San Gabriel Valley Area 3 Superfund Site was established by the USEPA in 1984 to address trichloroethylene (TCE) and tetrachloroethylene (PCE) contamination detected in groundwater. Remedial Investigation/ Feasibility Study (RI/FS) activities began in 1999. According to the "*Progress Report on San Gabriel Valley Ground Water Clean Up*", issued in December 2011 by the EPA, the remedial investigation activities for Area 3 were completed in 2009 and currently the EPA is conducting an feasibility study for the area with completion estimated in 2012, however no reports are publically available and the status of this work is unknown at this time. The EPA issued a report "*San Gabriel Valley Area 3 Superfund Site Ground Water Summary Report 2008-2012*", dated September, 2012. The report continues to show regional groundwater impacts and the hydraulic discontinuity limiting groundwater flow from the Western half of the basin that the Site is located to the Eastern half of the basin, which contains all the public drinking water production wells. Several properties located in the vicinity and at a higher reported groundwater elevation than the Site currently are being investigated and/or monitored for TCE and PCE impacts to groundwater.

The LARWQCB inspected the Site in February of 2000 and identified several areas of concern, which were investigated through shallow soil gas surveys in May and June of 2000. In October of 2000, six multi-depth vapor monitoring wells, designated VW-1 through VW-5 and VW-7, were installed at the Site (see Figure 2) to a maximum depth of 105 feet below ground surface (bgs). In February of 2001, one multi-depth vapor monitoring well, VW-6, was installed at the Site to a reported depth of 200 feet bgs, with vapor probes installed at 20-foot intervals, beginning at 120 feet bgs.

Agere Systems attempted to install a groundwater monitoring well at the Site in early 2002, however no groundwater was encountered during drilling to a depth of approximately 350 feet bgs.

The seven vapor probes (VW-1 through VW-7), previously installed at the Site, were sampled in November of 2002. Obtained soil vapor results indicated the presence of TCE at a maximum concentration of 2,300 parts per billion (ppb) in vapor well VW-1-B at a depth of 75 feet bgs. A TCE concentration of 1,800 ppb also was reported in vapor well VW-6 at 140 feet bgs and concentrations of this compound appeared to decline with increasing depth, with 1,300 ppb detected at 160 feet bgs, 290 ppb detected at 180 feet bgs, and 140 ppb detected at 200 feet bgs. In addition, 950 ppb of TCE was detected at VW-7 at 220 feet bgs.

In August of 2005, ENVIRON installed, developed, and sampled monitoring well EMW-1 (see Figure 2). The depth of the installed well was at approximately 200 feet bgs and the screened interval extended from approximately 170 to 200 feet bgs.

Based on the reported TCE concentration in groundwater, the LARWQCB requested further investigation of the lateral extent of the groundwater impacts at the Site. On June 26, 2006, ENVIRON submitted a work plan to install two groundwater monitoring wells to assess the local groundwater flow direction and to provide upgradient and downgradient groundwater quality data. The LARWQCB approved the work plan on July 17, 2006.

Following approval of the work plan ENVIRON installed two groundwater monitoring wells, EMW-2 and EMW-3 in November 2006. All three groundwater monitoring wells, including existing EMW-1, and the two newly installed wells EMW-2 and EMW-3 (see Figure 2 for the well locations) were sampled on November 30, 2006 and they were incorporated into a quarterly groundwater monitoring program implemented at the Site.

In September 2007, ENVIRON installed and sampled 6 nested vapor probes (each screened at approximately 5, 20, 35, and 50 feet bgs) between Buildings 5 and 6, and in the vicinity of upgradient well EMW-2, as requested by the LARWQCB in its letter dated March 20, 2007. The results of this investigation were included in ENVIRON's report entitled "*Report for Soil Vapor Assessment between Buildings 5 and 6, 2015 West Chestnut Street, Alhambra, California,*" dated October 30, 2007. The soil gas assessment reported the presence of low-level concentrations of volatile organic compounds (VOCs), which were not indicative of any potential near surface contaminant sources in the vicinity of groundwater monitoring well EMW-2. Therefore, ENVIRON concluded that detected VOCs in EMW-2 represented groundwater quality transported to the Site from upgradient, off-site locations.

Five quarterly groundwater monitoring events were conducted at the Site from November 2006 through December 2007. In 2008 ENVIRON began to monitor groundwater at the Site on the annual basis in accordance with the LARWQCB approved request submitted by LSI in April 2008 and

conducted the annual sampling events in February 2008 and 2009, March 2010, May 2011, March 2012, and March 2013.

The results of the groundwater monitoring events conducted at the Site to date consistently indicate the presence of chlorinated VOCs in each of the sampled wells. TCE is the VOC detected at the highest concentrations and the other VOCs are either present in approximately the same ratio to the TCE concentrations or are not detected above their laboratory reporting limits. In 8 of 11 sampling events, TCE concentrations historically were consistently highest in upgradient well EMW-2. This consistency suggests that the groundwater in the three wells is part of an area-wide plume and that historical activities on the eastern portion of the Site have not significantly impacted the underlying groundwater quality. Therefore, the main source of the VOCs in groundwater underlying the Site appears to be located upgradient and off-site.

This report presents the results of the 2013 annual groundwater monitoring event conducted by ENVIRON at the Site on March 11, 2013.

Regional Geologic/Hydrogeologic Conditions

The regional geologic and hydrogeologic conditions described in this section, were evaluated based on ENVIRON's review of a reports entitled "*Remedial Investigation, San Gabriel Valley Area 3 Superfund Site*," dated December 2008 and "*San Gabriel Valley Area 3 Superfund Site Ground Water Summary Report 2008-2012*", dated September, 2012 prepared by CH2M Hill for the USEPA. The USEPA has been conducting an RI/FS since 1999 to address the regional groundwater contamination within the San Gabriel Valley in Los Angeles County, California. Four Superfund sites (Area 1 through Area 4) were designated by the USEPA within the San Gabriel Valley and were placed on the National Priority List. The Site is located within the southwestern portion of Area 3. Area 3 is comprised of a 19-square mile region that contains VOCs in groundwater underlying the cities of Alhambra, Rosemead, San Gabriel, San Marino, South Pasadena, Temple City and parts of unincorporated Los Angeles County, California.

Alluvium in Area 3 is composed of relatively young floodplain and stream channel deposits, consisting of interbedded layers and lenses of fine-grained and coarse-grained sediments. These sediments resulted from the erosion and southward transport of coarse-grained sediments from the San Gabriel Mountains, and the erosion of finer-grained sediments from the sedimentary rocks in the adjacent hills. The alluvium measures up to approximately 300 feet in thickness but it is not present in areas where sedimentary bedrock outcrops at the surface. The bedrock sequence underlying alluvium in Area 3 consists of the Pico, Puente and Topanga Formations, and the Santa Monica Slate basement complex. The Pliocene (Tertiary) Pico Formation, which is 10 to 100 feet thick, consists of weakly cemented sandy siltstone, and interbedded sandy conglomerate to silty sandstone. The Upper Miocene (Tertiary) Puente Formation consists of siltstone, shale, and conglomerate, with interbedded sandstone and mudstone. Approximately 80 to 100 feet of the upper portion of the Puente Formation is highly weathered in the areas where the formation underlies alluvium. The Middle Miocene-aged (Tertiary) Topanga Formation is comprised of well-cemented interbedded siltstone, sandstone, and shale. The Santa Monica Slate Basement Complex of Jurassic age, is present at depths exceeding 5,000 feet bgs in the western portion of Area 3.

Several faults are located in and near Area 3. The Raymond Fault forms the northern boundary of Area 3 and separates the San Gabriel Basin from the Raymond Basin. A geologic discontinuity, possibly a fault zone associated with the Whittier fault system is present between the western and eastern portions of Area 3, where a significant increase in bedrock depth occurs over a short distance from west to east. According to the CH2M Hill investigation, the bedrock discontinuity appears to affect the groundwater flow between the western and eastern portions of Area 3. The Site is located west of this described geologic discontinuity in the western portion of Area 3.

The alluvium in the western portion of Area 3 (to the west of the bedrock discontinuity) and in the vicinity of the Site primarily consists of relatively fine-grained sediments with less prevalent layers of coarse-grained sediments, compared to the sediments east of the discontinuity. The alluvium is up to 300 feet thick.

Two generalized aquifers have been identified in the western portion of Area 3: the Western Alluvial Aquifer and the Bedrock Aquifer. The Western Alluvial Aquifer includes the relatively fine-grained to coarse-grained alluvium. The thickness of this aquifer can reach up to 90 feet in areas where bedrock is present at greater depths and is thin or absent if bedrock is shallow or outcrops on the surface. The Bedrock Aquifer generally is comprised of finer-grained and more consolidated material than the Alluvial Aquifer. Only a limited number of wells are completed in the Bedrock Aquifer.

In the eastern portion of Area 3, an alluvial aquifer is formed within a relatively coarse-grained alluvium derived from the San Gabriel Mountains. The base of the alluvium/bedrock surface slopes from northwest to southeast and a significant increase in bedrock depth occurs over a relatively short distance from west to east in Area 3. Three groundwater zones are present in the Eastern Alluvial Aquifer, designated as the shallow, intermediate, and deep groundwater zones. The majority of groundwater production in Area 3 occurs from the confined, deep groundwater zone located beneath the intermediate zone in the Eastern Alluvial Aquifer.

Prior to the late 1940s the eastern and western aquifers in Area 3 exhibited similar groundwater level fluctuations and direct hydraulic communication. After the 1940s, due to increased pumping in the San Gabriel Basin groundwater levels in the eastern portion of Area 3 dropped significantly below the western bedrock elevation and therefore the Western Alluvial Aquifer became hydraulically separated from the Eastern Alluvial Aquifer. Currently groundwater elevations measured in the western portion of Area 3 are approximately 100 feet higher than the groundwater elevations measured to the east of the bedrock discontinuity. A significant hydraulic gradient present at the structural bedrock discontinuity and additionally, no response in western wells to pumping in wells to the east of the bedrock discontinuity, are indicative of a resistance to groundwater flow from west to east.

Local Geologic/Hydrologic Conditions

To illustrate the local geological conditions observed at the Site, ENVIRON developed a lithologic cross-section, A-A', along the west-east direction (Figure 4). The location of the cross-section is shown on Figure 2.

As shown on the cross-section, the sediments within the vadose zone beneath the Site consist primarily of fine-grained type material (silt, sandy silt, and clay) extending from ground surface to a total depth drilled at the Site (approximately 200 feet bgs). Within this fine-grained unit, several

intermittent and/or continuous layers of coarse grained material (sand and silty sand), each 5 to 30 feet thick, were recorded during drilling of wells EMW-1 and EMW-2. Groundwater is present within a relatively thin sandy layer extending from approximately 177 to 184 feet bgs at EMW-2 and from 190 to 196 feet bgs at EMW-1. Groundwater encountered within this unit is under confined conditions, and is likely associated with the Western Alluvial Aquifer.

Historically, the presence of groundwater observed in the monitoring wells has been consistent with that detected at nearby sites (Pemeco, Ideal Wireworks, China Press, and Charter Communications).

Field Activities

On March 11, 2013 ENVIRON conducted the 2013 annual groundwater monitoring event at the Site. These activities consisted of depth to groundwater measurements, well purging, groundwater sample collection, and laboratory analyses from three monitoring wells (EMW-1, EMW-2, and EMW-3).

Field activities were conducted in accordance with ENVIRON's site-specific Health and Safety Plan (H&S Plan). The H&S Plan is designed to minimize exposure of ENVIRON field personnel to potentially hazardous materials.

The groundwater sampling activities were performed as follows:

- **Depth to Water Measurements:** Prior to purging the wells, water levels were measured at each well to the nearest 0.01 foot using a Solinst electronic water tape. Measurements at each well were made from a referenced survey point and recorded on a Water Purging and Sampling Log. All water purging and sampling logs are included in Attachment A.
- **Purging:** A minimum of three casing volumes of groundwater were purged from each well using a submersible pump prior to sampling. At regular intervals, the purged groundwater was monitored for temperature, pH, turbidity, and specific conductance.
- **Sample Collection and Analyses:** After purging, and once the water level in the well had recovered to approximately static conditions (or within 80% recovery from static conditions), a groundwater sample was drawn from each well using a disposable bailer. Groundwater samples were placed in appropriately labeled and preserved sample containers provided by the laboratory. The samples were collected and handled under chain-of-custody procedures, stored on ice, and delivered on the day of collection to Test America in Irvine, California, a California State-certified laboratory. Groundwater samples were analyzed for VOCs by USEPA Method 8260B, and 1,2,3-trichloropropane (1,2,3-TCP) using USEPA Method 524.5 (with a reporting limit of 5 parts per trillion [ppt]) per the requirements set forth in the March 20, 2007 LARWQCB letter.
- **Decontamination:** Prior to purging each well, the purging equipment was decontaminated by steam cleaning, washing in a non-phosphate cleaning solution, and then rinsing with distilled water.
- **Quality Assurance/Quality Control (QA/QC):** QA/QC samples including a field duplicate, an equipment blank, and a trip blank were collected and analyzed to verify the accuracy of laboratory data reporting and quality of sample handling. A duplicate sample was collected from Well EMW-1 and labeled as MW-100. An equipment blank sample was collected from the disposable bailer and labeled MW-200. A trip blank, provided by the laboratory and labeled by ENVIRON as MW-300 was submitted to the laboratory together with groundwater samples. The

QA/QC samples were analyzed for the same suite of compounds as the collected groundwater samples (VOCs, and 1,2,3-TCP).

- Handling of Purge Water: Purge water produced during the groundwater sampling activities was placed in labeled Department of Transportation approved 55-gallon drums and will be disposed of off-site in accordance with state and federal regulations.

Results

Hydrogeologic Findings

Table 1 summarizes the depth to groundwater and groundwater level measurements, and Figure 3 shows the groundwater elevations and the groundwater elevation contours calculated from the depth to water measurements collected during this sampling event.

Depth to groundwater, as measured on March 11, 2013, was between 175.82 and 187.19 feet bgs, and calculated groundwater elevations ranged from 284.26 to 297.85 feet above mean sea level. As has been historically reported, the groundwater elevation in upgradient well, EMW-2, is more than 10 feet greater than in monitoring well EMW-1 and the groundwater flow direction is generally toward southeast at the Site (Figure 3). The hydraulic gradient is approximately 0.025 foot/foot. Generally, the groundwater flow direction and the hydraulic gradient are consistent with the directions and the gradients previously calculated at the Site. When compared to the March 2012 data, groundwater elevations decreased in March 2013 by approximately 0.31 and 0.41 in monitoring wells EMW-1 and EMW-3, respectively and increased approximately 0.28 feet in EMW-2.

Groundwater Analytical Results

Groundwater analytical results are summarized in Table 2. The laboratory analytical report is included in Attachment B.

TCE was reported in all three groundwater samples collected from EMW-1, EMW-2, and EMW-3 during this sampling event. TCE concentrations ranged from 35 µg/l in well EMW-3 to 1,100 µg/l in well EMW-2. Figure 5 presents a map of isoconcentration contours estimated from the TCE concentrations detected in the underlying groundwater. PCE concentrations ranged from 3.3 µg/l in EMW-3 to 19 µg/l in EMW-2. Other VOCs detected were 1,2-dichloroethane (1,2-DCA), 1,1-dichloroethene (1,1-DCE), cis-1,2-dichloroethene (cis-1,2-DCE), carbon tetrachloride, and 1,2,3-TCP. 1,1-DCE was detected at 6 µg/l and 9.2 µg/l in monitoring well EMW-1 and EMW-2, respectively and was not detected in EMW-3. Cis-1,2-DCE was reported in wells EMW-1 (11 µg/l) and EMW-2 (5.8 µg/l). 1,2,3-TCP was detected in EMW-1 at a concentration of 17 nanograms per liter (ng/l).

Quality Control Samples

Field samples collected during this sampling event included one trip blank, one equipment blank sample (from the submersible pump), and one duplicate sample from monitoring well EMW-1. The equipment blank sample (MW-200), the trip blank (MW-300) and the duplicate sample (MW-100) were analyzed for the same suite of compounds analyzed for in the primary sample. Duplicate sample results were similar to the results reported in the primary sample. The equipment blank and the trip blank samples did not contain any compounds above laboratory reporting limits.

Conclusions

The following conclusions have been developed based on the results presented in this report:

- In March 2013, the local groundwater flow direction appeared to be southeasterly, which is consistent with the general easterly flow direction reported regionally. There is a relatively steep gradient of approximately 0.025 foot per foot from the western most well (EMW-2) to the eastern most well (EMW-1).
- The analytical results indicate that groundwater collected from all of the three groundwater monitoring wells contains chlorinated solvents. In each well, TCE was the compound detected at the highest concentrations while other VOCs found in groundwater were either present at relatively low concentrations or were not detected above their method detection limits.
- High concentrations of TCE, PCE, cis-1,2-DCE, and 1,2-DCA are present in the upgradient well (EMW-2). Based on the spatial distribution of these compounds it appears that VOC impacted groundwater is migrating to the Site from an upgradient, off-site source.

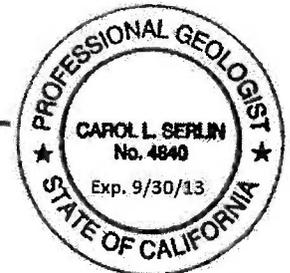
Closure

Please feel free to contact Carol Serlin or Jeff Raumin at 949-261-5151 if you have any questions or comments regarding this letter report.

Very truly yours,


Jeff Raumin, PE
Manager


Carol L. Serlin, PG
Principal



JR:gw

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cc: Scott Houthuysen, LSI Corporation

Attachments

Tables

Table 1: Groundwater Elevations

Agere Systems
Alhambra, California

Monitoring Well	Total Depth (feet below TOC)	Screen Interval (feet bgs)	Measurement Date	Depth to Water (feet below TOC)	Rim Elevation (feet above MSL)	Top of Casing Elevation (feet above MSL)	Groundwater Elevation (feet above MSL)
EMW-1	200.25	170-200	8/29/2005	186.99	471.75	471.45	284.46
			11/30/2006	182.80			288.65
			2/27/2007	181.86			289.59
			6/27/2007	181.52			289.93
			9/18/2007	181.89			289.56
			12/12/2007	181.53			289.92
			2/28/2008	181.29			290.16
			2/26/2009	183.45			288.00
			3/3/2010	184.72			286.73
			5/11/2011	186.59			284.86
			3/12/2012	186.88			284.57
		3/11/2013	187.19			284.26	
EMW-2	185.50	165-185	11/30/2006	173.91	474.24	473.67	299.76
			2/27/2007	173.48			300.19
			6/27/2007	173.33			300.34
			9/18/2007	174.04			299.63
			12/12/2007	173.65			300.02
			2/28/2008	173.72			299.95
			2/26/2009	175.13			298.54
			3/3/2010	175.33			298.34
			5/11/2011	176.07			297.60
			3/12/2012	176.10			297.57
		3/11/2013	175.82			297.85	
EMW-3	193.60	179-194	11/30/2006	178.14	468.86	468.58	290.44
			2/27/2007	177.21			291.37
			6/27/2007	177.04			291.54
			9/18/2007	177.55			291.03
			12/12/2007	177.24			291.34
			2/28/2008	176.90			291.68
			2/26/2009	178.97			289.61
			3/3/2010	180.07			288.51
			5/11/2011	181.71			286.87
			3/12/2012	181.96			286.62
		3/11/2013	182.37			286.21	

P:\A\Agere\Alhambra\0413476Q 2013 Groundwater Sampling\Draft Report[All Tables2013.xlsx]Table 1

Notes:

- TOC = Top of Well Casing
- BGS = Below Ground Surface
- MSL = Mean Sea Level

Table 2: Summary of Groundwater Analytical Results
 Agere Systems
 Alhambra, California

Sample Number	Date Sampled	Benzene	CT	Chloroform	1,1-DCA	1,2-DCA	1,1-DCE	cis-1,2-DCE	PCE	TCE	1,2,3-TCP	1,4-Dioxane
		(µg/l)										(ng/l)
EMW-1	8/29/2005	<20	<20	<40	<40	<20	<40	<40	<40	1,700	9.1	2
	2/16/2006	<0.5	0.72	3.5	3.6	<0.5	17	17	5.1	2,200	<i>N/A¹</i>	3.3
	11/30/2006	<10	<10	<20	<20	<10	20	<20	<20	2,200	12	8
	11/30/2006	<5	<5	<10	<10	<5	18	13	<10	2,200	11	7.6
	2/27/2007	<20	<20	<40	<40	<20	<40	<40	<40	2,500	14	6.2
	2/27/2007	<10	<10	<20	<20	<10	20	<20	<20	2,600	13	6
	6/27/2007	<0.5	1.1	3.6	2.7	0.5	17	10	10	2,200	11	--
	6/27/2007	<2.5	<5	<5	<5	<2.5	16	13	9.4	2,100	12	--
	9/18/2007	<2.5	<2.5	<5	<5	<2.5	16	9	8.6	1,800	12	--
	9/18/2007	<2.5	<5	<5	<5	<2.5	14	9.3	9.2	1,800	9.1	--
	12/12/2007	<0.5	0.58	2.50	2.0	<0.5	11	8.0	7.6	1,300	8.8	--
	12/12/2007	<2.5	<2.5	<5	<5	<2.5	9	7.4	8.8	1,400	8	--
	2/28/2008	<2.5	<2.5	<5	<5	<2.5	16	11	13	2,400	10	--
	2/28/2008	<2.5	<2.5	<5	<5	<2.5	16	8.6	13	2,300	9.6	--
	2/26/2009	<5	<5	<5	<5	<5	18	17	11	2,200	14	--
	2/26/2009	<5	<5	<5	<5	<5	19	17.0	11	2,200	14	--
	3/3/2010	<2.5	3.8	<5	<5	<2.5	18	17	9.2	2,100	11	--
	5/11/2011	<2.0	<2.0	<4	<4	<2	11	12	7.6	1,400	8.4	--
	5/11/2011	<2.0	<2.0	<4	<4	<2	11	12	7.4	1,400	6.0	--
	3/12/2012	<2.5	<2.5	2.70	2.9	<2.5	9	15	8.3	1,400	11.0	--
3/12/2012	<2.5	<2.5	3.20	3.2	<2.5	11	18	8.3	1,500	13.0	--	
3/11/2013	<2.0	<2.0	<4.0	<4.0	<2.0	6.1	11	7.0	1,000	13.0	--	
3/11/2013	<1.0	1.2	<2.0	<2.0	<1.0	6	11	7.0	920	17	--	
EMW-2	11/30/2006	<0.5	2.2	1.3	4.1	11	15	17	33	2,300	<5	<0.48
	2/27/2007	<20	<20	<40	<40	<20	<40	<40	<40	1,900	<5	<0.47
	6/27/2007	<2.5	3.0	<5	<5	11	21	15	27	1,700	<5	--
	9/18/2007	<0.5	3.2	1.2	3.1	10	15	12	25	2,100	<5	--
	12/12/2007	<2.5	<2.5	<5	<5	10	16	17	28	1,700	<5	--
	2/28/2008	<5	<5	<10	<10	15	29	26	46	3,200	<5	--
	2/26/2009	<5	<5	<10	<10	11	22	28	26	2,700	6.2	--
	3/3/2010	<2.5	4.2	<5	5.4	4.1	16	21	23	2,400	8.3	--
	3/3/2010	<2.5	4.2	<5	5.8	3.7	16	22	25	2,600	9.1	--
	5/11/2011	<2.5	<2.5	<5	<5.0	4.4	16	13	23	1,900	<5	--
3/12/2012	<2.5	<2.5	<5	2.6	4.0	15	9	23	1,300	<5	--	
3/11/2013	<2.0	3.0	<4.0	<4.0	3.5	9.2	5.8	19	1,100	<5	--	
EMW-3	11/30/2006	0.54	0.60	<1	<1	<0.5	3.2	<1	3.2	51	<5	<0.47
	2/27/2007	<0.5	<0.5	<1	<1	<0.5	3.9	<1	2.9	63	<5	<0.48
	6/27/2007	<0.5	<0.5	<1	<1	<0.5	3.7	<1	3.1	63	<5	--
	9/18/2007	<0.5	0.63	<1	<1	<0.5	2.3	<1	3.3	66	<5	--
	12/12/2007	<0.5	<0.5	<1	<1	<0.5	1.7	<1	4.2	30	<5	--
	2/28/2008	<0.5	0.61	<1	<1	<0.5	1.5	<1	6.7	42	<5	--
	2/26/2009	<0.5	<0.5	<1	<1	<0.5	1.8	<1	3.8	35	<5	--
	3/3/2010	<0.5	1.1	<1	<1	<0.5	2.3	<1	3.3	44	<5	--
	5/11/2011	<0.5	<0.5	<1	<1	<0.5	2.3	<1	3.3	39	<5	--
	3/12/2012	<0.5	0.50	0.62	<1	<0.5	2.0	<0.5	3.4	43	<5	--
3/11/2013	<0.5	0.72	<1	<1	<0.5	<1.0	<0.5	3.3	35	<5	--	
CDHS MCL		1.0	0.5	-	5.0	0.5	6.0	6.0	5.0	5.0	5.0 ²	3.0 ²

P:\AAgere\Alhambra\0413476Q 2013 Groundwater Sampling\Draft Report\All Tables\2013.xlsx\Table 2.

Notes:

- CT = Carbon Tetrachloride
- DCA = Dichloroethane
- DCE = Dichloroethene
- PCE = Tetrachloroethene
- TCE = Trichloroethene
- TCP = Trichloropropane
- CDHS MCL = California Department of Health Services Maximum Contaminant Level

- µg/l = micrograms per liter
- ng/l = nanograms per liter
- FD = field duplicate
- <1 = not detected above reporting limit shown

N/A¹ = Not Available – The laboratory report indicated that the 40 mL vials with hydrochloric acid supplied for sample collection were contaminated with 1,2,3-trichloropropane. As a result all 1,2,3-trichloropropane results reported for this set of samples are potentially biased high and cannot be used as an accurate measure of analyte concentration from the sample sources

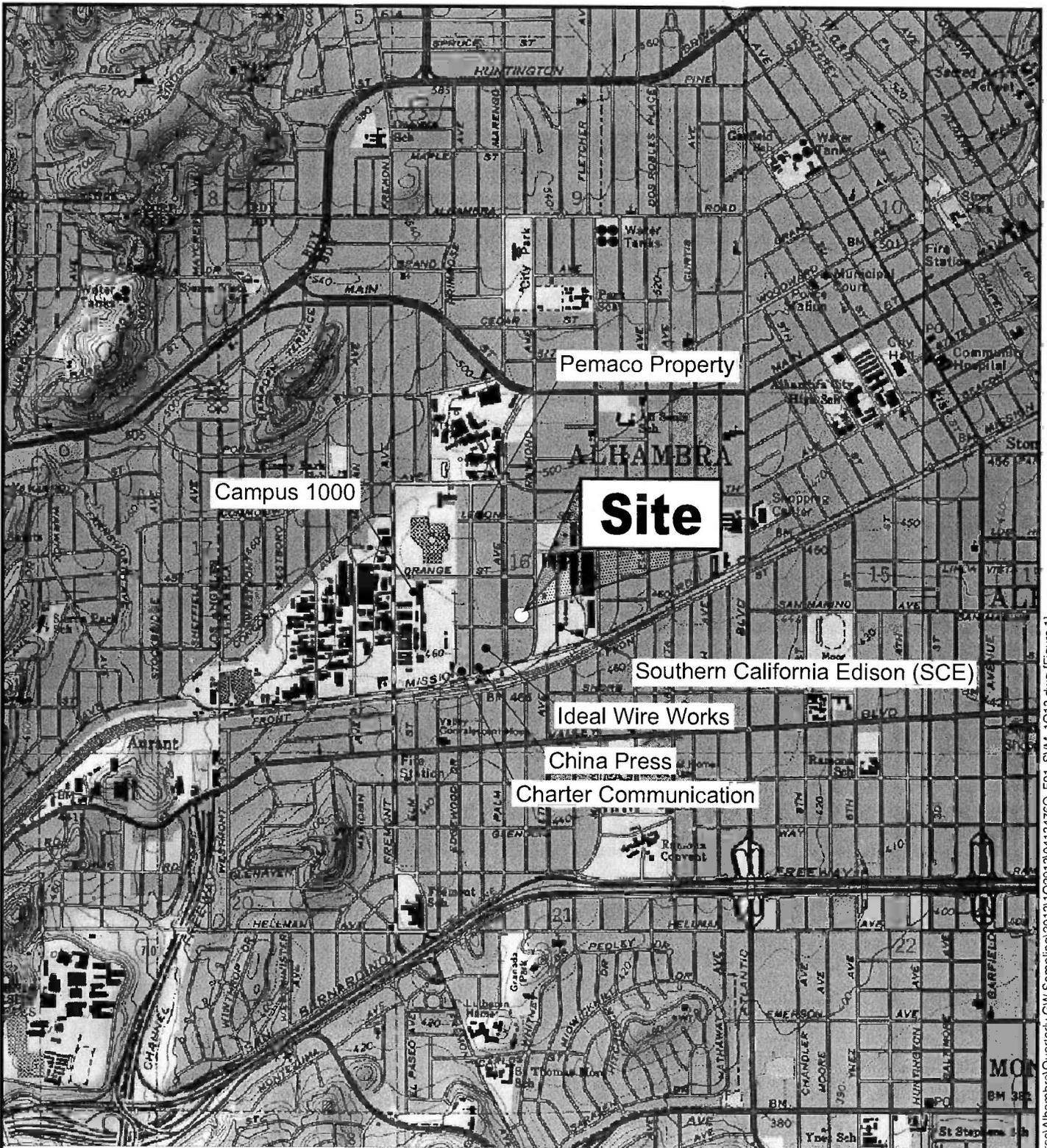
-- = Not analyzed per requirements of the March 20, 2007 RWQCB letter

2 = California Action Level

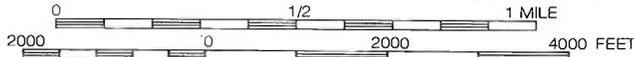
Bold = Analytical result exceeding a regulatory limit

Italics = Duplicate sample analytical results

Figures



Map Created with TOPO! (tm) (c)2001 National Geographic Holdings (www.topo.com)



CONTOUR INTERVAL 20 FEET
 NATIONAL GEODETIC VERTICAL DATUM OF 1929
 SCALE 1:24000



SOURCE:
 U.S.G.S. 7.5 minute series (topographic)
 Los Angeles Quadrangle, version 1991, current as 1994
 El Monte Quadrangle, version 1991, current as 1994



Site Vicinity Map

2015 W. Chestnut Street, Alhambra, California

Figure
1

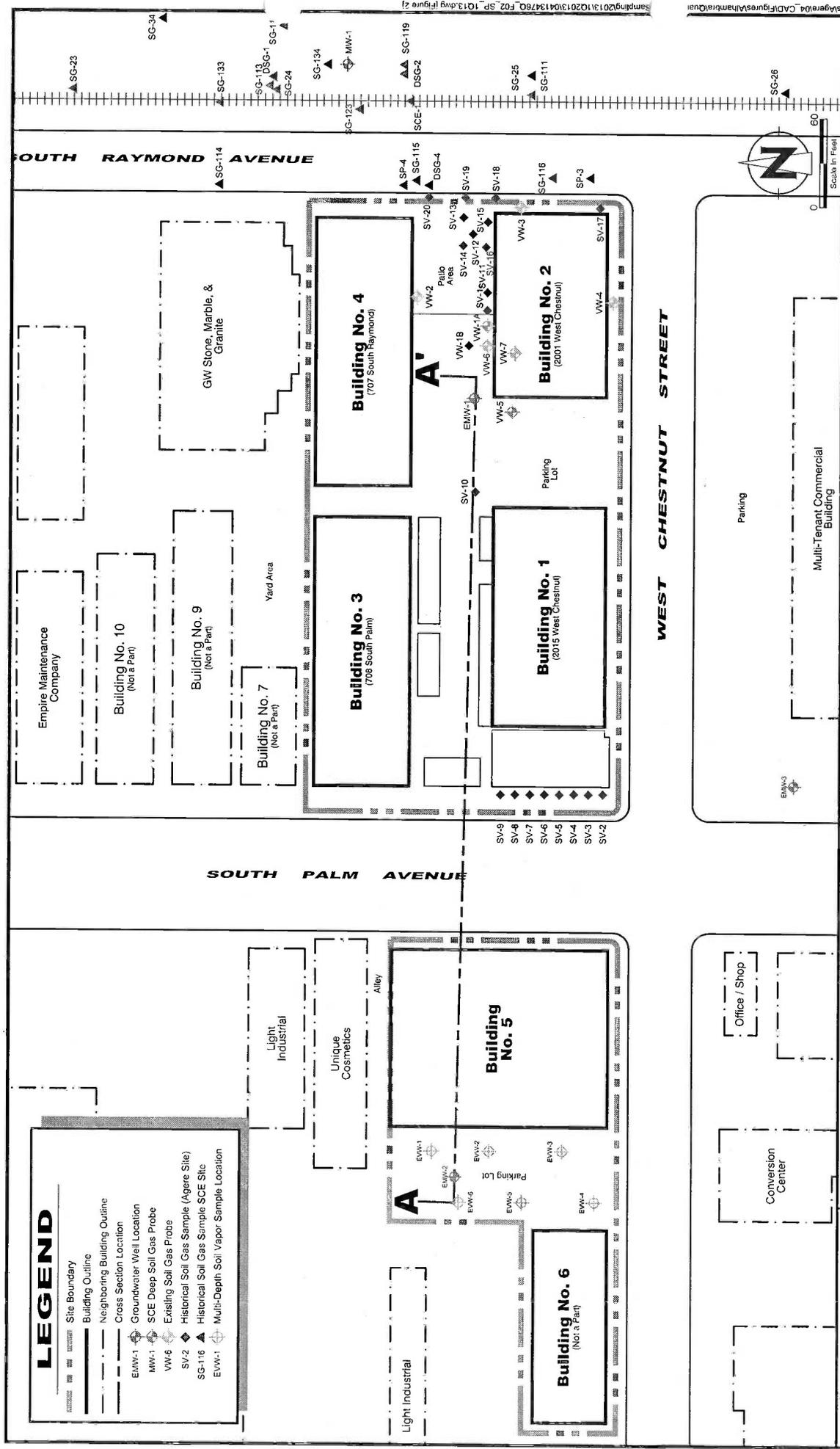
Drafter: SSS

Date: 3/23/09

Contract Number: 04-13476Q

Approved:

Revised: 3/27/13



LEGEND

- Site Boundary
- Building Outline
- Neighboring Building Outline
- Cross Section Location
- Groundwater Well Location
- EW-1
- WV-1
- SCE Deep Soil Gas Probe
- WV-6
- Existing Soil Gas Probe
- SV-2
- Historical Soil Gas Sample (Agere Site)
- SG-116
- Historical Soil Gas Sample SCE Site
- EW-1
- Multi-Depth Soil Vapor Sample Location

ENVIRON

DATE: 3/23/09 REVISED: 3/27/13

Site Plan

2015 W. Chestnut Street, Alhambra, California

PROJECT NO.: 04-13476Q

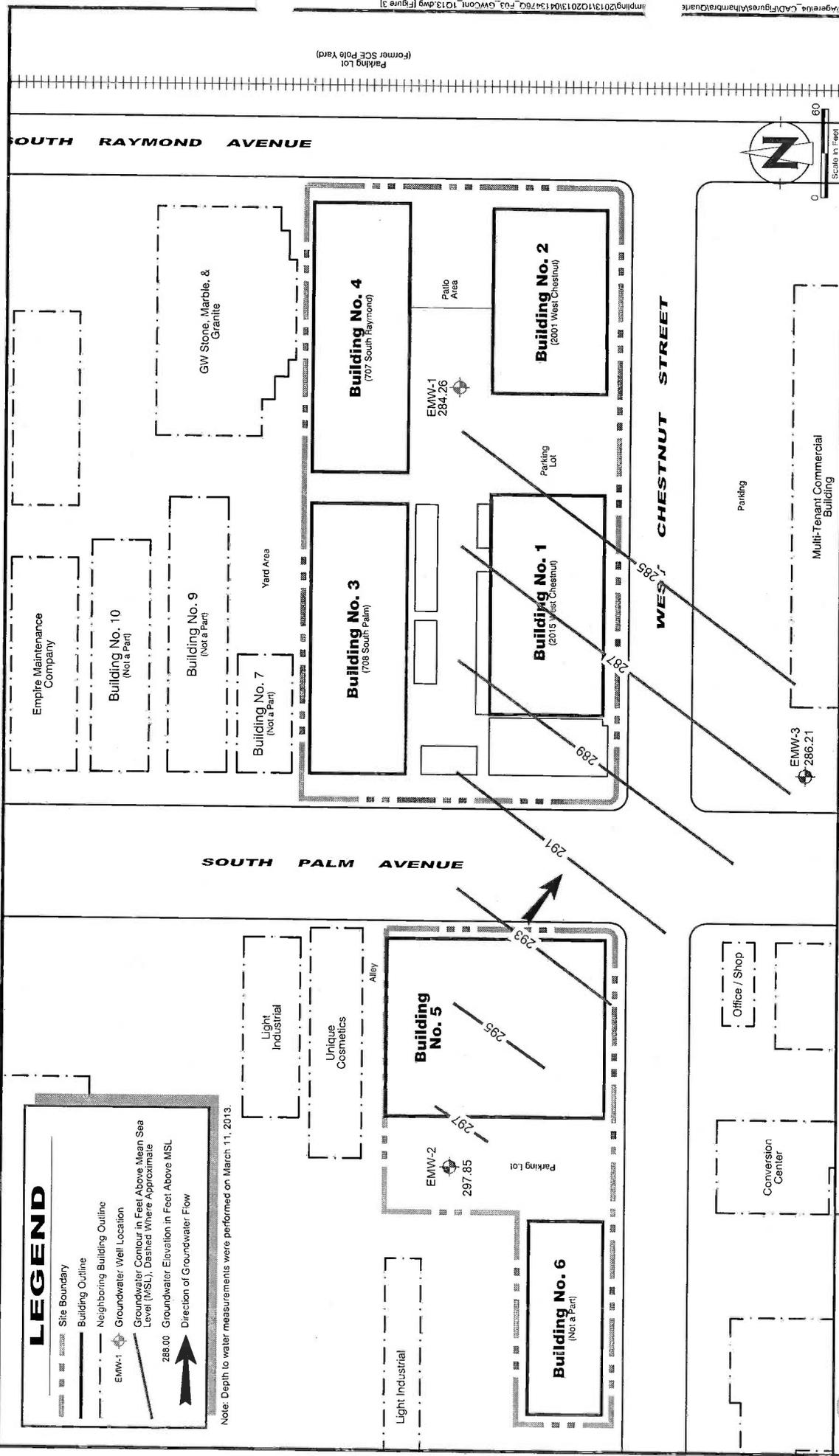
Figure 2



LEGEND

- Site Boundary
- Building Outline
- Neighboring Building Outline
- Groundwater Well Location
- EMW-1
- Groundwater Contour in Feet Above Mean Sea Level (MSL), Dashed Where Approximate
- Groundwater Elevation in Feet Above MSL
- Direction of Groundwater Flow

Note: Depth to water measurements were performed on March 11, 2013.



Groundwater Elevation Contour Map

2015 W. Chestnut Street, Alhambra, California

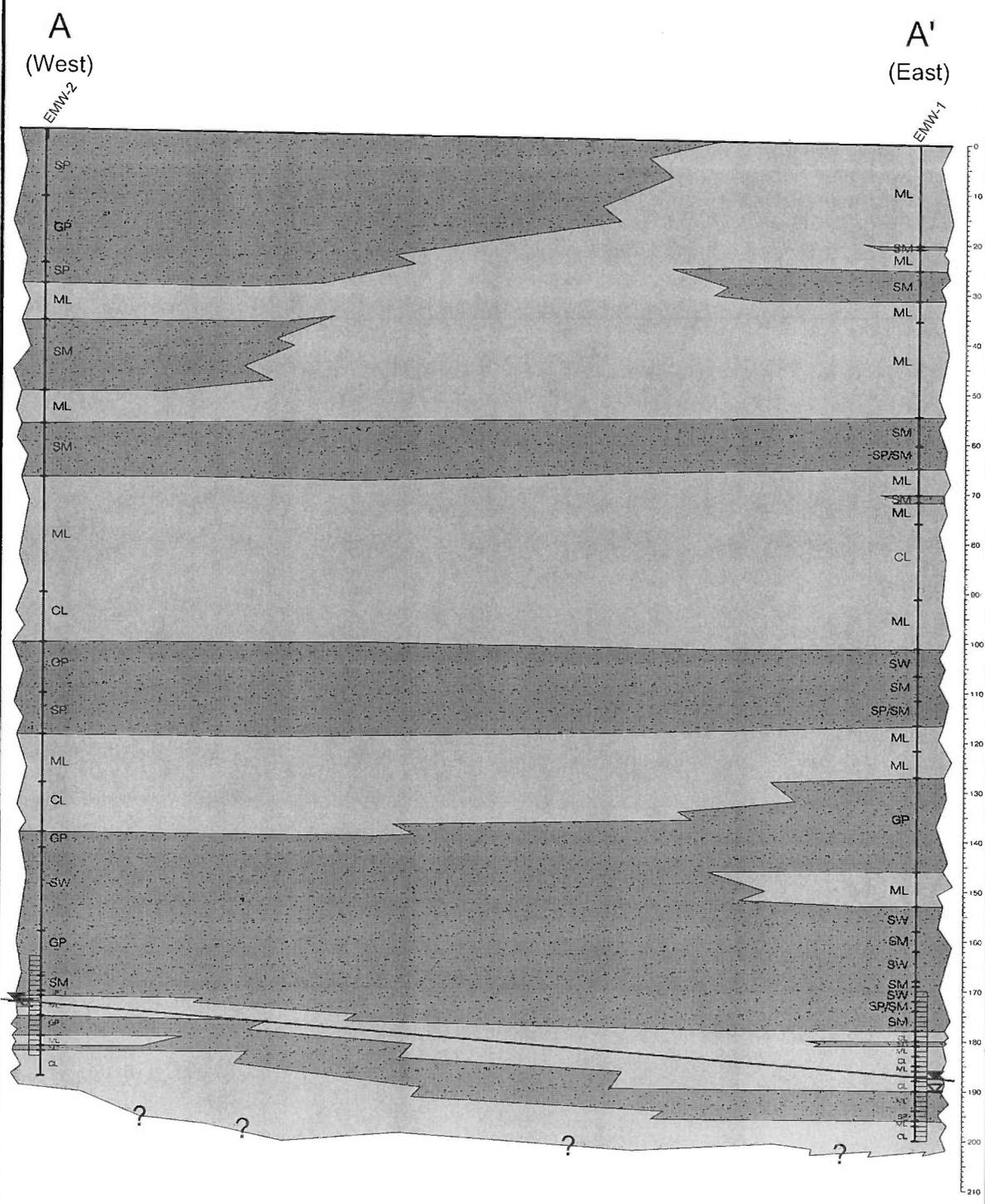
PROJECT NO.: 04-134760

Figure 3

ENVIRON

DATE: 3/23/09 REVISION: 3/27/13

DRAWN BY: JJC



LITHOLOGY

- Sand (SP), Silty Sand (SM), Clayey Sand (SC), Gravelly Sand (GS), Gravel (GP), Silty Gravel (GM), and Clayey Gravel (GC)
- Clays (CL) and Silts (ML)

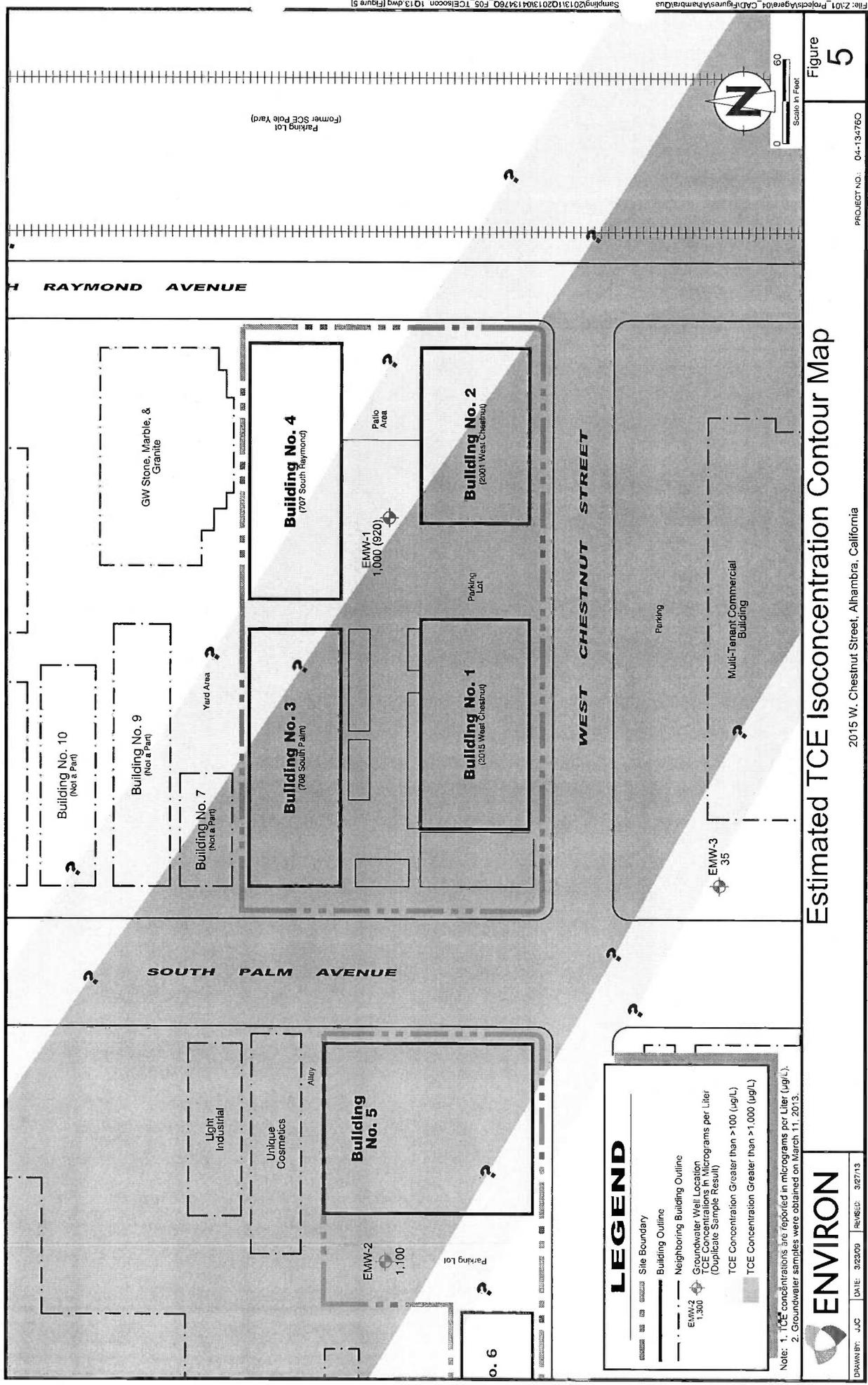
LEGEND

- EMW-1 Monitoring Well
- Groundwater Depth during Drilling
- Static Groundwater Depth (May 2011)

NOTES:

1. Similar soil units have been grouped together where necessary for clarity. Soils are classified in accordance with the Unified Soil Classification System.
2. All lithologic interpretation and correlations are approximate and may be revised if additional data become available.
3. Approximate elevations relative to mean sea level.





Drawn By: JUC DATE: 02/20/09 REVISED: 02/27/13

Note: 1. TCE concentrations are reported in micrograms per liter (µg/L).
 2. Groundwater samples were obtained on March 11, 2013.

Estimated TCE Isoconcentration Contour Map

2015 W. Chestnut Street, Alhambra, California

PROJECT NO.: 04-13-760

Figure 5

iment A
ing Logs

ENVIRO

2010 Main St., Suite 900
Irvine, California 92614
(949) 261-5151
(949) 261-6202 (FAX)

WATER PURGING & SAMPLING LOG

PROJECT NAME: Agene FIELD PERSON: M. Henry-Luna
PROJECT NUMBER: 04-134760 PROJECT MANAGER: J. Rawlin
PROJECT LOCATION: Alhambra, CA DATE: 3/11/13

PURGING/SAMPLING METHOD: <u>2" pump / bailer</u>		WELL NUMBER: <u>Emw-1</u>	
EQUIPMENT CLEANING METHOD: <u>Steam / Alconox</u>		CASING RADIUS: <u>2</u> (in.)	
PURGE WATER DISPOSAL: <u>drum</u>		TOTAL DEPTH (TD): <u>199.95</u> (ft.)	
GALLONS PURGED: <u>27.0</u>		DEPTH TO WATER (DTW): <u>187.19</u> (ft.)	
CASING VOLUMES: <u>3.25</u>		CASING VOLUME: <u>8.32</u> (gal.)	
		(TD-DTW)(CR) ² (.163)= <u>3</u> WELL VOLUMES: <u>25.0</u> (gal.)	

PURGE START TIME: _____ PURGE RATE (GPM): + or - 1.5

TIME/GALLONS PURGED	pH	CONDUCTIVITY (mS/cm)	TURBIDITY (NTU)	D.O. (mg/L)	TEMP (°C)	ORP (mv)	COMMENTS
<u>115 1209 / 0</u>	<u>7.05</u>	<u>1.16</u>	<u>104</u>	<u>7.69</u>	<u>23.0</u>	<u>119.1</u>	
<u>1212 / 4.5</u>	<u>7.03</u>	<u>1.15</u>	<u>35</u>	<u>7.38</u>	<u>24.8</u>	<u>104.3</u>	
<u>1215 / 9.0</u>	<u>7.00</u>	<u>1.12</u>	<u>40</u>	<u>7.15</u>	<u>25.1</u>	<u>97.0</u>	
<u>1218 / 13.5</u>	<u>6.99</u>	<u>1.11</u>	<u>22</u>	<u>7.05</u>	<u>25.1</u>	<u>95.3</u>	
<u>1221 / 18.0</u>	<u>6.97</u>	<u>1.08</u>	<u>19</u>	<u>6.83</u>	<u>25.1</u>	<u>95.8</u>	
<u>1224 / 22.5</u>	<u>6.96</u>	<u>1.06</u>	<u>10</u>	<u>6.77</u>	<u>25.1</u>	<u>96.4</u>	
<u>1227 27.0</u>	<u>6.96</u>	<u>1.04</u>	<u>11</u>	<u>6.70</u>	<u>25.1</u>	<u>96.9</u>	

PURGE STOP TIME: 1227 FINAL DTW: 187.19 @ 12:39 80% = 189.74
LAB NAME: TestAmerica SAMPLE ID: Emw-1

OBSERVATIONS/COMMENTS:
take field duplicate.
equipment blank prior to sample.
Slight brownish tint. no odor.

PUMP SET AT = 192' FEET

2010 Main St., Suite 900
Irvine, California 92614
(949) 261-5151
(949) 261-6202 (FAX)

WATER PURGING & SAMPLING LOG

PROJECT NAME: Agere FIELD PERSON: M. Henry-Luna
PROJECT NUMBER: 04-134760 PROJECT MANAGER: J. Ravmin
PROJECT LOCATION: Alhambra, CA DATE: 3/11/13

PURGING/SAMPLING METHOD: <u>2" pump/bailer</u>		WELL NUMBER: <u>Emw-2</u>	
EQUIPMENT CLEANING METHOD: <u>Steam/Alconox</u>		CASING RADIUS: <u>2</u> (in.)	
PURGE WATER DISPOSAL: <u>drum</u>		TOTAL DEPTH (TD): <u>184.99</u> (ft.)	
GALLONS PURGED: <u>180</u>		DEPTH TO WATER (DTW): <u>175.82</u> (ft.)	
CASING VOLUMES: <u>3 @ 1</u>		CASING VOLUME: <u>5.98</u> (gal.)	
		$(TD-DTW)(CR)^2(.163)=$	
		<u>3</u> WELL VOLUMES: <u>17.9</u> (gal.)	

PURGE START TIME: 1033 PURGE RATE (GPM): ~ 1.0

TIME/GALLONS PURGED	pH	CONDUCTIVITY (mS/cm)	TURBIDITY (NTU)	D.O. (mg/L)	TEMP (°C)	ORP (mv)	COMMENTS
<u>1033/0</u>	<u>6.99</u>	<u>0.79</u>	<u>94</u>	<u>6.69</u>	<u>22.7</u>	<u>124.8</u>	
<u>1036/3.0</u>	<u>6.86</u>	<u>0.71</u>	<u>105</u>	<u>6.61</u>	<u>23.6</u>	<u>112.6</u>	
<u>1039/6.0</u>	<u>6.80</u>	<u>0.75</u>	<u>113</u>	<u>6.47</u>	<u>25.0</u>	<u>103.0</u>	
<u>1042/9.0</u>	<u>6.76</u>	<u>0.81</u>	<u>36</u>	<u>6.37</u>	<u>25.3</u>	<u>100.9</u>	
<u>1045/12.0</u>	<u>6.75</u>	<u>0.82</u>	<u>18</u>	<u>6.36</u>	<u>25.4</u>	<u>99.8</u>	
<u>1048/15.0</u>	<u>6.74</u>	<u>0.82</u>	<u>13</u>	<u>6.35</u>	<u>25.5</u>	<u>99.4</u>	
<u>1051/18.0</u>	<u>6.74</u>	<u>0.82</u>	<u>11</u>	<u>6.37</u>	<u>25.5</u>	<u>99.8</u>	

PURGE STOP TIME: 1051 FINAL DTW: 175.99 @ 11:04 80% = 177.65

LAB NAME: TEST AMERICA SAMPLE ID: EMW-2

OBSERVATIONS/COMMENTS:
brownish-yellowish tinge. no odor.

PUMP SET AT = 180' FEET

2010 Main St., Suite 900
Irvine, California 92614
(949) 261-5151
(949) 261-6202 (FAX)

WATER PURGING & SAMPLING LOG

PROJECT NAME: Agere FIELD PERSON: m. Henry - Luna
 PROJECT NUMBER: 04-13476 PROJECT MANAGER: J. Rawmin
 PROJECT LOCATION: Alhambra, CA DATE: 3/11/13

PURGING/SAMPLING METHOD: <u>2" pump/bailer</u>		WELL NUMBER: <u>Emw-3</u>	
EQUIPMENT CLEANING METHOD: <u>Steam/Alconox</u>		CASING RADIUS: <u>2</u> (in.)	
PURGE WATER DISPOSAL: <u>drum</u>		TOTAL DEPTH (TD): <u>193.30</u> (ft.)	
GALLONS PURGED: <u>22.5</u>		DEPTH TO WATER (DTW): <u>182.37</u> (ft.)	
CASING VOLUMES: 3.0 ^{mHL} <u>3.15</u>		CASING VOLUME: <u>7.13</u> (gal.)	
		$(TD-DTW)(CR)^2(.163)=$	
		<u>3</u> WELL VOLUMES: <u>21.4</u> (gal.)	

PURGE START TIME: 0920 PURGE RATE (GPM): ~1.5

TIME/GALLONS PURGED	pH	CONDUCTIVITY (mS/cm)	TURBIDITY (NTU)	D.O. (mg/L)	TEMP (°C)	ORP (mv)	COMMENTS
<u>0920 / 0</u>	<u>6.70</u>	<u>1.02</u>	<u>59</u>	<u>6.30</u>	<u>24.8</u>	<u>148.9</u>	
<u>0923 / 3.0</u>	<u>6.77</u>	<u>1.00</u>	<u>144</u>	<u>6.42</u>	<u>25.2</u>	<u>107.1</u>	
<u>0924 / 6.0</u>	<u>6.77</u>	<u>1.00</u>	<u>150</u>	<u>6.41</u>	<u>25.2</u>	<u>104.3</u>	
<u>0929 / 13.5</u>	<u>6.77</u>	<u>0.99</u>	<u>75</u>	<u>6.41</u>	<u>25.1</u>	<u>101.7</u>	
<u>0932 / 18.0</u>	<u>6.78</u>	<u>1.00</u>	<u>39</u>	<u>6.38</u>	<u>25.1</u>	<u>102.2</u>	
<u>0935 / 22.5</u>	<u>6.78</u>	<u>1.01</u>	<u>40</u>	<u>6.40</u>	<u>25.0</u>	<u>102.4</u>	

PURGE STOP TIME: 0935 FINAL DTW: 182.36' @ 09:46 80% = 184.56

LAB NAME: Test America SAMPLE ID: Emw-3

OBSERVATIONS/COMMENTS:
relatively clear. no odor.

PUMP SET AT = 187' FEET

Attachment B
Groundwater Laboratory Analytical Reports

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

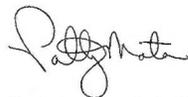
ANALYTICAL REPORT

TestAmerica Laboratories, Inc.
TestAmerica Irvine
17461 Derian Ave
Suite 100
Irvine, CA 92614-5817
Tel: (949)261-1022

TestAmerica Job ID: 440-40516-1
Client Project/Site: Agere, Alhambra/04-13476Q

For:
ENVIRON International Corp.
18100 Von Karman Avenue
Irvine, California 92612

Attn: Mr. Jeff Raumin



Authorized for release by:
3/22/2013 9:46:22 AM

Patty Mata
Project Manager I
patty.mata@testamericainc.com

LINKS

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This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

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Sample Summary

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
440-40516-1	MW-300	Water	03/11/13 08:00	03/11/13 14:50
440-40516-2	EMW-3	Water	03/11/13 09:46	03/11/13 14:50
440-40516-3	EMW-2	Water	03/11/13 11:04	03/11/13 14:50
440-40516-4	MW-200	Water	03/11/13 11:40	03/11/13 14:50
440-40516-5	EMW-1	Water	03/11/13 12:39	03/11/13 14:50
440-40516-6	MW-100	Water	03/11/13 12:39	03/11/13 14:50



Case Narrative

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Job ID: 440-40516-1

Laboratory: TestAmerica Irvine

Narrative

Job Narrative
440-40516-1

Comments

No additional comments.

Receipt

The samples were received on 3/11/2013 2:50 PM; the samples arrived in good condition, properly preserved and, where required, on ice. The temperature of the cooler at receipt was 2.7° C.

GC/MS VOA

No analytical or quality issues were noted.

VOA Prep

No analytical or quality issues were noted.



Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: MW-300

Lab Sample ID: 440-40516-1

Date Collected: 03/11/13 08:00

Matrix: Water

Date Received: 03/11/13 14:50

Method: 8260B - Volatile Organic Compounds (GC/MS)								
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		0.50	ug/L			03/19/13 01:10	1
Bromobenzene	ND		1.0	ug/L			03/19/13 01:10	1
Bromochloromethane	ND		1.0	ug/L			03/19/13 01:10	1
Bromodichloromethane	ND		1.0	ug/L			03/19/13 01:10	1
Bromoform	ND		1.0	ug/L			03/19/13 01:10	1
Bromomethane	ND		1.0	ug/L			03/19/13 01:10	1
Carbon tetrachloride	ND		0.50	ug/L			03/19/13 01:10	1
Chlorobenzene	ND		1.0	ug/L			03/19/13 01:10	1
Chloroethane	ND		1.0	ug/L			03/19/13 01:10	1
Chloroform	ND		1.0	ug/L			03/19/13 01:10	1
Chloromethane	ND		1.0	ug/L			03/19/13 01:10	1
2-Chlorotoluene	ND		1.0	ug/L			03/19/13 01:10	1
4-Chlorotoluene	ND		1.0	ug/L			03/19/13 01:10	1
cis-1,2-Dichloroethene	ND		1.0	ug/L			03/19/13 01:10	1
cis-1,3-Dichloropropene	ND		0.50	ug/L			03/19/13 01:10	1
Dibromochloromethane	ND		1.0	ug/L			03/19/13 01:10	1
1,2-Dibromo-3-Chloropropane	ND		5.0	ug/L			03/19/13 01:10	1
1,2-Dibromoethane (EDB)	ND		1.0	ug/L			03/19/13 01:10	1
Dibromomethane	ND		1.0	ug/L			03/19/13 01:10	1
1,2-Dichlorobenzene	ND		1.0	ug/L			03/19/13 01:10	1
1,3-Dichlorobenzene	ND		1.0	ug/L			03/19/13 01:10	1
1,4-Dichlorobenzene	ND		1.0	ug/L			03/19/13 01:10	1
Dichlorodifluoromethane	ND		5.0	ug/L			03/19/13 01:10	1
1,1-Dichloroethane	ND		1.0	ug/L			03/19/13 01:10	1
1,2-Dichloroethane	ND		0.50	ug/L			03/19/13 01:10	1
1,1-Dichloroethene	ND		1.0	ug/L			03/19/13 01:10	1
1,2-Dichloropropane	ND		1.0	ug/L			03/19/13 01:10	1
1,3-Dichloropropane	ND		1.0	ug/L			03/19/13 01:10	1
2,2-Dichloropropane	ND		1.0	ug/L			03/19/13 01:10	1
1,1-Dichloropropene	ND		1.0	ug/L			03/19/13 01:10	1
Ethylbenzene	ND		1.0	ug/L			03/19/13 01:10	1
Hexachlorobutadiene	ND		1.0	ug/L			03/19/13 01:10	1
Isopropylbenzene	ND		1.0	ug/L			03/19/13 01:10	1
Methylene Chloride	ND		5.0	ug/L			03/19/13 01:10	1
m,p-Xylene	ND		1.0	ug/L			03/19/13 01:10	1
Naphthalene	ND		1.0	ug/L			03/19/13 01:10	1
n-Butylbenzene	ND		1.0	ug/L			03/19/13 01:10	1
N-Propylbenzene	ND		1.0	ug/L			03/19/13 01:10	1
o-Xylene	ND		0.50	ug/L			03/19/13 01:10	1
p-Isopropyltoluene	ND		1.0	ug/L			03/19/13 01:10	1
sec-Butylbenzene	ND		1.0	ug/L			03/19/13 01:10	1
Styrene	ND		1.0	ug/L			03/19/13 01:10	1
tert-Butylbenzene	ND		1.0	ug/L			03/19/13 01:10	1
1,1,1,2-Tetrachloroethane	ND		1.0	ug/L			03/19/13 01:10	1
1,1,2,2-Tetrachloroethane	ND		1.0	ug/L			03/19/13 01:10	1
Tetrachloroethene	ND		1.0	ug/L			03/19/13 01:10	1
Toluene	ND		1.0	ug/L			03/19/13 01:10	1
trans-1,2-Dichloroethene	ND		1.0	ug/L			03/19/13 01:10	1
trans-1,3-Dichloropropene	ND		0.50	ug/L			03/19/13 01:10	1

TestAmerica Irvine



Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: MW-300

Lab Sample ID: 440-40516-1

Date Collected: 03/11/13 08:00

Matrix: Water

Date Received: 03/11/13 14:50

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
1,2,3-Trichlorobenzene	ND		1.0	ug/L			03/19/13 01:10	1	
1,2,4-Trichlorobenzene	ND		1.0	ug/L			03/19/13 01:10	1	
1,1,1-Trichloroethane	ND		1.0	ug/L			03/19/13 01:10	1	
1,1,2-Trichloroethane	ND		1.0	ug/L			03/19/13 01:10	1	
Trichloroethene	ND		1.0	ug/L			03/19/13 01:10	1	
Trichlorofluoromethane	ND		1.0	ug/L			03/19/13 01:10	1	
1,2,4-Trimethylbenzene	ND		1.0	ug/L			03/19/13 01:10	1	
1,3,5-Trimethylbenzene	ND		1.0	ug/L			03/19/13 01:10	1	
Vinyl chloride	ND		0.50	ug/L			03/19/13 01:10	1	
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac	
4-Bromofluorobenzene (Surr)	94		80 - 120				03/19/13 01:10	1	
Dibromofluoromethane (Surr)	96		80 - 120				03/19/13 01:10	1	
Toluene-d8 (Surr)	99		80 - 120				03/19/13 01:10	1	

Client Sample ID: EMW-3

Lab Sample ID: 440-40516-2

Date Collected: 03/11/13 09:46

Matrix: Water

Date Received: 03/11/13 14:50

Method: 524.2M_CA-SRL - Volatile Organic Compounds (GC/MS SIM)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
1,2,3-Trichloropropane	ND		0.0050	ug/L			03/13/13 13:37	1	

Method: 8260B - Volatile Organic Compounds (GC/MS)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
Benzene	ND		0.50	ug/L			03/19/13 01:41	1	
Bromobenzene	ND		1.0	ug/L			03/19/13 01:41	1	
Bromochloromethane	ND		1.0	ug/L			03/19/13 01:41	1	
Bromodichloromethane	ND		1.0	ug/L			03/19/13 01:41	1	
Bromoform	ND		1.0	ug/L			03/19/13 01:41	1	
Bromomethane	ND		1.0	ug/L			03/19/13 01:41	1	
Carbon tetrachloride	0.72		0.50	ug/L			03/19/13 01:41	1	
Chlorobenzene	ND		1.0	ug/L			03/19/13 01:41	1	
Chloroethane	ND		1.0	ug/L			03/19/13 01:41	1	
Chloroform	ND		1.0	ug/L			03/19/13 01:41	1	
Chloromethane	ND		1.0	ug/L			03/19/13 01:41	1	
2-Chlorotoluene	ND		1.0	ug/L			03/19/13 01:41	1	
4-Chlorotoluene	ND		1.0	ug/L			03/19/13 01:41	1	
cis-1,2-Dichloroethene	ND		1.0	ug/L			03/19/13 01:41	1	
cis-1,3-Dichloropropene	ND		0.50	ug/L			03/19/13 01:41	1	
Dibromochloromethane	ND		1.0	ug/L			03/19/13 01:41	1	
1,2-Dibromo-3-Chloropropane	ND		5.0	ug/L			03/19/13 01:41	1	
1,2-Dibromoethane (EDB)	ND		1.0	ug/L			03/19/13 01:41	1	
Dibromomethane	ND		1.0	ug/L			03/19/13 01:41	1	
1,2-Dichlorobenzene	ND		1.0	ug/L			03/19/13 01:41	1	
1,3-Dichlorobenzene	ND		1.0	ug/L			03/19/13 01:41	1	
1,4-Dichlorobenzene	ND		1.0	ug/L			03/19/13 01:41	1	
Dichlorodifluoromethane	ND		5.0	ug/L			03/19/13 01:41	1	
1,1-Dichloroethane	ND		1.0	ug/L			03/19/13 01:41	1	
1,2-Dichloroethane	ND		0.50	ug/L			03/19/13 01:41	1	

TestAmerica Irvine



Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: EMW-3

Lab Sample ID: 440-40516-2

Date Collected: 03/11/13 09:46

Matrix: Water

Date Received: 03/11/13 14:50

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
1,1-Dichloroethene	ND		1.0	ug/L			03/19/13 01:41	1
1,2-Dichloropropane	ND		1.0	ug/L			03/19/13 01:41	1
1,3-Dichloropropane	ND		1.0	ug/L			03/19/13 01:41	1
2,2-Dichloropropane	ND		1.0	ug/L			03/19/13 01:41	1
1,1-Dichloropropene	ND		1.0	ug/L			03/19/13 01:41	1
Ethylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
Hexachlorobutadiene	ND		1.0	ug/L			03/19/13 01:41	1
Isopropylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
Methylene Chloride	ND		5.0	ug/L			03/19/13 01:41	1
m,p-Xylene	ND		1.0	ug/L			03/19/13 01:41	1
Naphthalene	ND		1.0	ug/L			03/19/13 01:41	1
n-Butylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
N-Propylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
o-Xylene	ND		0.50	ug/L			03/19/13 01:41	1
p-Isopropyltoluene	ND		1.0	ug/L			03/19/13 01:41	1
sec-Butylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
Styrene	ND		1.0	ug/L			03/19/13 01:41	1
tert-Butylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
1,1,1,2-Tetrachloroethane	ND		1.0	ug/L			03/19/13 01:41	1
1,1,2,2-Tetrachloroethane	ND		1.0	ug/L			03/19/13 01:41	1
Tetrachloroethene	3.3		1.0	ug/L			03/19/13 01:41	1
Toluene	ND		1.0	ug/L			03/19/13 01:41	1
trans-1,2-Dichloroethene	ND		1.0	ug/L			03/19/13 01:41	1
trans-1,3-Dichloropropene	ND		0.50	ug/L			03/19/13 01:41	1
1,2,3-Trichlorobenzene	ND		1.0	ug/L			03/19/13 01:41	1
1,2,4-Trichlorobenzene	ND		1.0	ug/L			03/19/13 01:41	1
1,1,1-Trichloroethane	ND		1.0	ug/L			03/19/13 01:41	1
1,1,2-Trichloroethane	ND		1.0	ug/L			03/19/13 01:41	1
Trichloroethene	35		1.0	ug/L			03/19/13 01:41	1
Trichlorofluoromethane	ND		1.0	ug/L			03/19/13 01:41	1
1,2,4-Trimethylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
1,3,5-Trimethylbenzene	ND		1.0	ug/L			03/19/13 01:41	1
Vinyl chloride	ND		0.50	ug/L			03/19/13 01:41	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	94		80 - 120				03/19/13 01:41	1
Dibromofluoromethane (Surr)	94		80 - 120				03/19/13 01:41	1
Toluene-d8 (Surr)	98		80 - 120				03/19/13 01:41	1

Client Sample ID: EMW-2

Lab Sample ID: 440-40516-3

Date Collected: 03/11/13 11:04

Matrix: Water

Date Received: 03/11/13 14:50

Method: 524.2M_CA-SRL - Volatile Organic Compounds (GC/MS SIM)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
1,2,3-Trichloropropane	ND		0.0050	ug/L			03/13/13 14:37	1

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		2.0	ug/L			03/19/13 03:42	4

TestAmerica Irvine



Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: EMW-2

Lab Sample ID: 440-40516-3

Date Collected: 03/11/13 11:04

Matrix: Water

Date Received: 03/11/13 14:50

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Bromobenzene	ND		4.0	ug/L			03/19/13 03:42	4
Bromochloromethane	ND		4.0	ug/L			03/19/13 03:42	4
Bromodichloromethane	ND		4.0	ug/L			03/19/13 03:42	4
Bromoform	ND		4.0	ug/L			03/19/13 03:42	4
Bromomethane	ND		4.0	ug/L			03/19/13 03:42	4
Carbon tetrachloride	3.0		2.0	ug/L			03/19/13 03:42	4
Chlorobenzene	ND		4.0	ug/L			03/19/13 03:42	4
Chloroethane	ND		4.0	ug/L			03/19/13 03:42	4
Chloroform	ND		4.0	ug/L			03/19/13 03:42	4
Chloromethane	ND		4.0	ug/L			03/19/13 03:42	4
2-Chlorotoluene	ND		4.0	ug/L			03/19/13 03:42	4
4-Chlorotoluene	ND		4.0	ug/L			03/19/13 03:42	4
cis-1,2-Dichloroethene	5.8		4.0	ug/L			03/19/13 03:42	4
cis-1,3-Dichloropropene	ND		2.0	ug/L			03/19/13 03:42	4
Dibromochloromethane	ND		4.0	ug/L			03/19/13 03:42	4
1,2-Dibromo-3-Chloropropane	ND		20	ug/L			03/19/13 03:42	4
1,2-Dibromoethane (EDB)	ND		4.0	ug/L			03/19/13 03:42	4
Dibromomethane	ND		4.0	ug/L			03/19/13 03:42	4
1,2-Dichlorobenzene	ND		4.0	ug/L			03/19/13 03:42	4
1,3-Dichlorobenzene	ND		4.0	ug/L			03/19/13 03:42	4
1,4-Dichlorobenzene	ND		4.0	ug/L			03/19/13 03:42	4
Dichlorodifluoromethane	ND		20	ug/L			03/19/13 03:42	4
1,1-Dichloroethane	ND		4.0	ug/L			03/19/13 03:42	4
1,2-Dichloroethane	3.5		2.0	ug/L			03/19/13 03:42	4
1,1-Dichloroethene	9.2		4.0	ug/L			03/19/13 03:42	4
1,2-Dichloropropane	ND		4.0	ug/L			03/19/13 03:42	4
1,3-Dichloropropane	ND		4.0	ug/L			03/19/13 03:42	4
2,2-Dichloropropane	ND		4.0	ug/L			03/19/13 03:42	4
1,1-Dichloropropene	ND		4.0	ug/L			03/19/13 03:42	4
Ethylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
Hexachlorobutadiene	ND		4.0	ug/L			03/19/13 03:42	4
Isopropylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
Methylene Chloride	ND		20	ug/L			03/19/13 03:42	4
m,p-Xylene	ND		4.0	ug/L			03/19/13 03:42	4
Naphthalene	ND		4.0	ug/L			03/19/13 03:42	4
n-Butylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
N-Propylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
o-Xylene	ND		2.0	ug/L			03/19/13 03:42	4
p-Isopropyltoluene	ND		4.0	ug/L			03/19/13 03:42	4
sec-Butylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
Styrene	ND		4.0	ug/L			03/19/13 03:42	4
tert-Butylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
1,1,1,2-Tetrachloroethane	ND		4.0	ug/L			03/19/13 03:42	4
1,1,2,2-Tetrachloroethane	ND		4.0	ug/L			03/19/13 03:42	4
Tetrachloroethene	19		4.0	ug/L			03/19/13 03:42	4
Toluene	ND		4.0	ug/L			03/19/13 03:42	4
trans-1,2-Dichloroethene	ND		4.0	ug/L			03/19/13 03:42	4
trans-1,3-Dichloropropene	ND		2.0	ug/L			03/19/13 03:42	4
1,2,3-Trichlorobenzene	ND		4.0	ug/L			03/19/13 03:42	4

TestAmerica Irvine



Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: EMW-2

Lab Sample ID: 440-40516-3

Date Collected: 03/11/13 11:04

Matrix: Water

Date Received: 03/11/13 14:50

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
1,2,4-Trichlorobenzene	ND		4.0	ug/L			03/19/13 03:42	4
1,1,1-Trichloroethane	ND		4.0	ug/L			03/19/13 03:42	4
1,1,2-Trichloroethane	ND		4.0	ug/L			03/19/13 03:42	4
Trichlorofluoromethane	ND		4.0	ug/L			03/19/13 03:42	4
1,2,4-Trimethylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
1,3,5-Trimethylbenzene	ND		4.0	ug/L			03/19/13 03:42	4
Vinyl chloride	ND		2.0	ug/L			03/19/13 03:42	4
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	94		80 - 120				03/19/13 03:42	4
Dibromofluoromethane (Surr)	102		80 - 120				03/19/13 03:42	4
Toluene-d8 (Surr)	99		80 - 120				03/19/13 03:42	4

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Trichloroethene	1100		20	ug/L			03/19/13 04:13	20
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	95		80 - 120				03/19/13 04:13	20
Dibromofluoromethane (Surr)	102		80 - 120				03/19/13 04:13	20
Toluene-d8 (Surr)	98		80 - 120				03/19/13 04:13	20

Client Sample ID: MW-200

Lab Sample ID: 440-40516-4

Date Collected: 03/11/13 11:40

Matrix: Water

Date Received: 03/11/13 14:50

Method: 524.2M_CA-SRL - Volatile Organic Compounds (GC/MS SIM)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
1,2,3-Trichloropropane	ND		0.0050	ug/L			03/13/13 15:08	1

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		0.50	ug/L			03/19/13 02:11	1
Bromobenzene	ND		1.0	ug/L			03/19/13 02:11	1
Bromochloromethane	ND		1.0	ug/L			03/19/13 02:11	1
Bromodichloromethane	ND		1.0	ug/L			03/19/13 02:11	1
Bromoform	ND		1.0	ug/L			03/19/13 02:11	1
Bromomethane	ND		1.0	ug/L			03/19/13 02:11	1
Carbon tetrachloride	ND		0.50	ug/L			03/19/13 02:11	1
Chlorobenzene	ND		1.0	ug/L			03/19/13 02:11	1
Chloroethane	ND		1.0	ug/L			03/19/13 02:11	1
Chloroform	ND		1.0	ug/L			03/19/13 02:11	1
Chloromethane	ND		1.0	ug/L			03/19/13 02:11	1
2-Chlorotoluene	ND		1.0	ug/L			03/19/13 02:11	1
4-Chlorotoluene	ND		1.0	ug/L			03/19/13 02:11	1
cis-1,2-Dichloroethene	ND		1.0	ug/L			03/19/13 02:11	1
cis-1,3-Dichloropropene	ND		0.50	ug/L			03/19/13 02:11	1
Dibromochloromethane	ND		1.0	ug/L			03/19/13 02:11	1
1,2-Dibromo-3-Chloropropane	ND		5.0	ug/L			03/19/13 02:11	1
1,2-Dibromoethane (EDB)	ND		1.0	ug/L			03/19/13 02:11	1
Dibromomethane	ND		1.0	ug/L			03/19/13 02:11	1

TestAmerica Irvine

Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: MW-200

Lab Sample ID: 440-40516-4

Date Collected: 03/11/13 11:40

Matrix: Water

Date Received: 03/11/13 14:50

Method: 8260B - Volatile Organic Compounds (GC/MS) (Continued)								
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
1,2-Dichlorobenzene	ND		1.0	ug/L			03/19/13 02:11	1
1,3-Dichlorobenzene	ND		1.0	ug/L			03/19/13 02:11	1
1,4-Dichlorobenzene	ND		1.0	ug/L			03/19/13 02:11	1
Dichlorodifluoromethane	ND		5.0	ug/L			03/19/13 02:11	1
1,1-Dichloroethane	ND		1.0	ug/L			03/19/13 02:11	1
1,2-Dichloroethane	ND		0.50	ug/L			03/19/13 02:11	1
1,1-Dichloroethene	ND		1.0	ug/L			03/19/13 02:11	1
1,2-Dichloropropane	ND		1.0	ug/L			03/19/13 02:11	1
1,3-Dichloropropane	ND		1.0	ug/L			03/19/13 02:11	1
2,2-Dichloropropane	ND		1.0	ug/L			03/19/13 02:11	1
1,1-Dichloropropene	ND		1.0	ug/L			03/19/13 02:11	1
Ethylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
Hexachlorobutadiene	ND		1.0	ug/L			03/19/13 02:11	1
Isopropylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
Methylene Chloride	ND		5.0	ug/L			03/19/13 02:11	1
m,p-Xylene	ND		1.0	ug/L			03/19/13 02:11	1
Naphthalene	ND		1.0	ug/L			03/19/13 02:11	1
n-Butylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
N-Propylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
o-Xylene	ND		0.50	ug/L			03/19/13 02:11	1
p-Isopropyltoluene	ND		1.0	ug/L			03/19/13 02:11	1
sec-Butylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
Styrene	ND		1.0	ug/L			03/19/13 02:11	1
tert-Butylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
1,1,1,2-Tetrachloroethane	ND		1.0	ug/L			03/19/13 02:11	1
1,1,2,2-Tetrachloroethane	ND		1.0	ug/L			03/19/13 02:11	1
Tetrachloroethene	ND		1.0	ug/L			03/19/13 02:11	1
Toluene	ND		1.0	ug/L			03/19/13 02:11	1
trans-1,2-Dichloroethene	ND		1.0	ug/L			03/19/13 02:11	1
trans-1,3-Dichloropropene	ND		0.50	ug/L			03/19/13 02:11	1
1,2,3-Trichlorobenzene	ND		1.0	ug/L			03/19/13 02:11	1
1,2,4-Trichlorobenzene	ND		1.0	ug/L			03/19/13 02:11	1
1,1,1-Trichloroethane	ND		1.0	ug/L			03/19/13 02:11	1
1,1,2-Trichloroethane	ND		1.0	ug/L			03/19/13 02:11	1
Trichloroethene	ND		1.0	ug/L			03/19/13 02:11	1
Trichlorofluoromethane	ND		1.0	ug/L			03/19/13 02:11	1
1,2,4-Trimethylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
1,3,5-Trimethylbenzene	ND		1.0	ug/L			03/19/13 02:11	1
Vinyl chloride	ND		0.50	ug/L			03/19/13 02:11	1
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	94		80 - 120				03/19/13 02:11	1
Dibromofluoromethane (Surr)	97		80 - 120				03/19/13 02:11	1
Toluene-d8 (Surr)	95		80 - 120				03/19/13 02:11	1

TestAmerica Irvine

Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: EMW-1

Lab Sample ID: 440-40516-5

Date Collected: 03/11/13 12:39

Matrix: Water

Date Received: 03/11/13 14:50

Method: 524.2M_CA-SRL - Volatile Organic Compounds (GC/MS SIM)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil	Fac
1,2,3-Trichloropropane	0.013		0.0050	ug/L			03/13/13 15:38	1	

Method: 8260B - Volatile Organic Compounds (GC/MS)									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil	Fac
Benzene	ND		2.0	ug/L			03/19/13 04:43	4	
Bromobenzene	ND		4.0	ug/L			03/19/13 04:43	4	
Bromochloromethane	ND		4.0	ug/L			03/19/13 04:43	4	
Bromodichloromethane	ND		4.0	ug/L			03/19/13 04:43	4	
Bromoform	ND		4.0	ug/L			03/19/13 04:43	4	
Bromomethane	ND		4.0	ug/L			03/19/13 04:43	4	
Carbon tetrachloride	ND		2.0	ug/L			03/19/13 04:43	4	
Chlorobenzene	ND		4.0	ug/L			03/19/13 04:43	4	
Chloroethane	ND		4.0	ug/L			03/19/13 04:43	4	
Chloroform	ND		4.0	ug/L			03/19/13 04:43	4	
Chloromethane	ND		4.0	ug/L			03/19/13 04:43	4	
2-Chlorotoluene	ND		4.0	ug/L			03/19/13 04:43	4	
4-Chlorotoluene	ND		4.0	ug/L			03/19/13 04:43	4	
cis-1,2-Dichloroethene	11		4.0	ug/L			03/19/13 04:43	4	
cis-1,3-Dichloropropene	ND		2.0	ug/L			03/19/13 04:43	4	
Dibromochloromethane	ND		4.0	ug/L			03/19/13 04:43	4	
1,2-Dibromo-3-Chloropropane	ND		20	ug/L			03/19/13 04:43	4	
1,2-Dibromoethane (EDB)	ND		4.0	ug/L			03/19/13 04:43	4	
Dibromomethane	ND		4.0	ug/L			03/19/13 04:43	4	
1,2-Dichlorobenzene	ND		4.0	ug/L			03/19/13 04:43	4	
1,3-Dichlorobenzene	ND		4.0	ug/L			03/19/13 04:43	4	
1,4-Dichlorobenzene	ND		4.0	ug/L			03/19/13 04:43	4	
Dichlorodifluoromethane	ND		20	ug/L			03/19/13 04:43	4	
1,1-Dichloroethane	ND		4.0	ug/L			03/19/13 04:43	4	
1,2-Dichloroethane	ND		2.0	ug/L			03/19/13 04:43	4	
1,1-Dichloroethene	6.1		4.0	ug/L			03/19/13 04:43	4	
1,2-Dichloropropane	ND		4.0	ug/L			03/19/13 04:43	4	
1,3-Dichloropropane	ND		4.0	ug/L			03/19/13 04:43	4	
2,2-Dichloropropane	ND		4.0	ug/L			03/19/13 04:43	4	
1,1-Dichloropropene	ND		4.0	ug/L			03/19/13 04:43	4	
Ethylbenzene	ND		4.0	ug/L			03/19/13 04:43	4	
Hexachlorobutadiene	ND		4.0	ug/L			03/19/13 04:43	4	
Isopropylbenzene	ND		4.0	ug/L			03/19/13 04:43	4	
Methylene Chloride	ND		20	ug/L			03/19/13 04:43	4	
m,p-Xylene	ND		4.0	ug/L			03/19/13 04:43	4	
Naphthalene	ND		4.0	ug/L			03/19/13 04:43	4	
n-Butylbenzene	ND		4.0	ug/L			03/19/13 04:43	4	
N-Propylbenzene	ND		4.0	ug/L			03/19/13 04:43	4	
o-Xylene	ND		2.0	ug/L			03/19/13 04:43	4	
p-Isopropyltoluene	ND		4.0	ug/L			03/19/13 04:43	4	
sec-Butylbenzene	ND		4.0	ug/L			03/19/13 04:43	4	
Styrene	ND		4.0	ug/L			03/19/13 04:43	4	
tert-Butylbenzene	ND		4.0	ug/L			03/19/13 04:43	4	
1,1,1,2-Tetrachloroethane	ND		4.0	ug/L			03/19/13 04:43	4	
1,1,1,2,2-Tetrachloroethane	ND		4.0	ug/L			03/19/13 04:43	4	
Tetrachloroethene	7.0		4.0	ug/L			03/19/13 04:43	4	

TestAmerica Irvine



Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: EMW-1

Lab Sample ID: 440-40516-5

Date Collected: 03/11/13 12:39

Matrix: Water

Date Received: 03/11/13 14:50

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Toluene	ND		4.0	ug/L			03/19/13 04:43	4
trans-1,2-Dichloroethene	ND		4.0	ug/L			03/19/13 04:43	4
trans-1,3-Dichloropropene	ND		2.0	ug/L			03/19/13 04:43	4
1,2,3-Trichlorobenzene	ND		4.0	ug/L			03/19/13 04:43	4
1,2,4-Trichlorobenzene	ND		4.0	ug/L			03/19/13 04:43	4
1,1,1-Trichloroethane	ND		4.0	ug/L			03/19/13 04:43	4
1,1,2-Trichloroethane	ND		4.0	ug/L			03/19/13 04:43	4
Trichlorofluoromethane	ND		4.0	ug/L			03/19/13 04:43	4
1,2,4-Trimethylbenzene	ND		4.0	ug/L			03/19/13 04:43	4
1,3,5-Trimethylbenzene	ND		4.0	ug/L			03/19/13 04:43	4
Vinyl chloride	ND		2.0	ug/L			03/19/13 04:43	4
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	94		80 - 120				03/19/13 04:43	4
Dibromofluoromethane (Surr)	100		80 - 120				03/19/13 04:43	4
Toluene-d8 (Surr)	99		80 - 120				03/19/13 04:43	4

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Trichloroethene	1000		20	ug/L			03/19/13 05:13	20
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	94		80 - 120				03/19/13 05:13	20
Dibromofluoromethane (Surr)	104		80 - 120				03/19/13 05:13	20
Toluene-d8 (Surr)	99		80 - 120				03/19/13 05:13	20

Client Sample ID: MW-100

Lab Sample ID: 440-40516-6

Date Collected: 03/11/13 12:39

Matrix: Water

Date Received: 03/11/13 14:50

Method: 524.2M_CA-SRL - Volatile Organic Compounds (GC/MS SIM)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
1,2,3-Trichloropropane	0.017		0.0050	ug/L			03/13/13 16:09	1

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		1.0	ug/L			03/19/13 02:41	2
Bromobenzene	ND		2.0	ug/L			03/19/13 02:41	2
Bromochloromethane	ND		2.0	ug/L			03/19/13 02:41	2
Bromodichloromethane	ND		2.0	ug/L			03/19/13 02:41	2
Bromoform	ND		2.0	ug/L			03/19/13 02:41	2
Bromomethane	ND		2.0	ug/L			03/19/13 02:41	2
Carbon tetrachloride	1.2		1.0	ug/L			03/19/13 02:41	2
Chlorobenzene	ND		2.0	ug/L			03/19/13 02:41	2
Chloroethane	ND		2.0	ug/L			03/19/13 02:41	2
Chloroform	ND		2.0	ug/L			03/19/13 02:41	2
Chloromethane	ND		2.0	ug/L			03/19/13 02:41	2
2-Chlorotoluene	ND		2.0	ug/L			03/19/13 02:41	2
4-Chlorotoluene	ND		2.0	ug/L			03/19/13 02:41	2
cis-1,2-Dichloroethene	11		2.0	ug/L			03/19/13 02:41	2
cis-1,3-Dichloropropene	ND		1.0	ug/L			03/19/13 02:41	2

TestAmerica Irvine

Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: MW-100

Lab Sample ID: 440-40516-6

Date Collected: 03/11/13 12:39

Matrix: Water

Date Received: 03/11/13 14:50

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Dibromochloromethane	ND		2.0	ug/L			03/19/13 02:41	2
1,2-Dibromo-3-Chloropropane	ND		10	ug/L			03/19/13 02:41	2
1,2-Dibromoethane (EDB)	ND		2.0	ug/L			03/19/13 02:41	2
Dibromomethane	ND		2.0	ug/L			03/19/13 02:41	2
1,2-Dichlorobenzene	ND		2.0	ug/L			03/19/13 02:41	2
1,3-Dichlorobenzene	ND		2.0	ug/L			03/19/13 02:41	2
1,4-Dichlorobenzene	ND		2.0	ug/L			03/19/13 02:41	2
Dichlorodifluoromethane	ND		10	ug/L			03/19/13 02:41	2
1,1-Dichloroethane	ND		2.0	ug/L			03/19/13 02:41	2
1,2-Dichloroethane	ND		1.0	ug/L			03/19/13 02:41	2
1,1-Dichloroethene	6.2		2.0	ug/L			03/19/13 02:41	2
1,2-Dichloropropane	ND		2.0	ug/L			03/19/13 02:41	2
1,3-Dichloropropane	ND		2.0	ug/L			03/19/13 02:41	2
2,2-Dichloropropane	ND		2.0	ug/L			03/19/13 02:41	2
1,1-Dichloropropene	ND		2.0	ug/L			03/19/13 02:41	2
Ethylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
Hexachlorobutadiene	ND		2.0	ug/L			03/19/13 02:41	2
Isopropylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
Methylene Chloride	ND		10	ug/L			03/19/13 02:41	2
m,p-Xylene	ND		2.0	ug/L			03/19/13 02:41	2
Naphthalene	ND		2.0	ug/L			03/19/13 02:41	2
n-Butylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
N-Propylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
o-Xylene	ND		1.0	ug/L			03/19/13 02:41	2
p-Isopropyltoluene	ND		2.0	ug/L			03/19/13 02:41	2
sec-Butylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
Styrene	ND		2.0	ug/L			03/19/13 02:41	2
tert-Butylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
1,1,1,2-Tetrachloroethane	ND		2.0	ug/L			03/19/13 02:41	2
1,1,2,2-Tetrachloroethane	ND		2.0	ug/L			03/19/13 02:41	2
Tetrachloroethene	7.0		2.0	ug/L			03/19/13 02:41	2
Toluene	ND		2.0	ug/L			03/19/13 02:41	2
trans-1,2-Dichloroethene	ND		2.0	ug/L			03/19/13 02:41	2
trans-1,3-Dichloropropene	ND		1.0	ug/L			03/19/13 02:41	2
1,2,3-Trichlorobenzene	ND		2.0	ug/L			03/19/13 02:41	2
1,2,4-Trichlorobenzene	ND		2.0	ug/L			03/19/13 02:41	2
1,1,1-Trichloroethane	ND		2.0	ug/L			03/19/13 02:41	2
1,1,2-Trichloroethane	ND		2.0	ug/L			03/19/13 02:41	2
Trichlorofluoromethane	ND		2.0	ug/L			03/19/13 02:41	2
1,2,4-Trimethylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
1,3,5-Trimethylbenzene	ND		2.0	ug/L			03/19/13 02:41	2
Vinyl chloride	ND		1.0	ug/L			03/19/13 02:41	2
Surrogate	%Recovery	Qualifier	Limits			Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	93		80 - 120				03/19/13 02:41	2
Dibromofluoromethane (Surr)	96		80 - 120				03/19/13 02:41	2
Toluene-d8 (Surr)	98		80 - 120				03/19/13 02:41	2



Client Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: MW-100

Lab Sample ID: 440-40516-6

Date Collected: 03/11/13 12:39

Matrix: Water

Date Received: 03/11/13 14:50

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

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Trichloroethene	920		10	ug/L			03/19/13 03:12	10
<i>Surrogate</i>	<i>%Recovery</i>	<i>Qualifier</i>	<i>Limits</i>			<i>Prepared</i>	<i>Analyzed</i>	<i>Dil Fac</i>
4-Bromofluorobenzene (Surr)	93		80 - 120				03/19/13 03:12	10
Dibromofluoromethane (Surr)	102		80 - 120				03/19/13 03:12	10
Toluene-d8 (Surr)	98		80 - 120				03/19/13 03:12	10



Lab Chronicle

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: MW-300

Date Collected: 03/11/13 08:00

Date Received: 03/11/13 14:50

Lab Sample ID: 440-40516-1

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	8260B		1	10 mL	10 mL	92529	03/19/13 01:10	WK	TAL IRV

Client Sample ID: EMW-3

Date Collected: 03/11/13 09:46

Date Received: 03/11/13 14:50

Lab Sample ID: 440-40516-2

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	524.2M_CA-SRL		1	25 mL	25 mL	91384	03/13/13 13:37	MF	TAL IRV
Total/NA	Analysis	8260B		1	10 mL	10 mL	92529	03/19/13 01:41	WK	TAL IRV

Client Sample ID: EMW-2

Date Collected: 03/11/13 11:04

Date Received: 03/11/13 14:50

Lab Sample ID: 440-40516-3

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	524.2M_CA-SRL		1	25 mL	25 mL	91384	03/13/13 14:37	MF	TAL IRV
Total/NA	Analysis	8260B		4	10 mL	10 mL	92529	03/19/13 03:42	WK	TAL IRV
Total/NA	Analysis	8260B	DL	20	10 mL	10 mL	92529	03/19/13 04:13	WK	TAL IRV

Client Sample ID: MW-200

Date Collected: 03/11/13 11:40

Date Received: 03/11/13 14:50

Lab Sample ID: 440-40516-4

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	524.2M_CA-SRL		1	25 mL	25 mL	91384	03/13/13 15:08	MF	TAL IRV
Total/NA	Analysis	8260B		1	10 mL	10 mL	92529	03/19/13 02:11	WK	TAL IRV

Client Sample ID: EMW-1

Date Collected: 03/11/13 12:39

Date Received: 03/11/13 14:50

Lab Sample ID: 440-40516-5

Matrix: Water

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	524.2M_CA-SRL		1	25 mL	25 mL	91384	03/13/13 15:38	MF	TAL IRV
Total/NA	Analysis	8260B		4	10 mL	10 mL	92529	03/19/13 04:43	WK	TAL IRV
Total/NA	Analysis	8260B	DL	20	10 mL	10 mL	92529	03/19/13 05:13	WK	TAL IRV

TestAmerica Irvine

Lab Chronicle

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Client Sample ID: MW-100

Lab Sample ID: 440-40516-6

Date Collected: 03/11/13 12:39

Matrix: Water

Date Received: 03/11/13 14:50

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	524.2M_CA-SRL		1	25 mL	25 mL	91384	03/13/13 16:09	MF	TAL IRV
Total/NA	Analysis	8260B		2	10 mL	10 mL	92529	03/19/13 02:41	WK	TAL IRV
Total/NA	Analysis	8260B	DL	10	10 mL	10 mL	92529	03/19/13 03:12	WK	TAL IRV

Laboratory References:

TAL IRV = TestAmerica Irvine, 17461 Derian Ave, Suite 100, Irvine, CA 92614-5817, TEL (949)261-1022



QC Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Method: 524.2M_CA-SRL - Volatile Organic Compounds (GC/MS SIM)

Lab Sample ID: MB 440-91384/3
 Matrix: Water
 Analysis Batch: 91384

Client Sample ID: Method Blank
 Prep Type: Total/NA

Analyte	MB MB		RL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier						
1,2,3-Trichloropropane	ND		0.0050	ug/L			03/13/13 12:13	1

Lab Sample ID: LCS 440-91384/2
 Matrix: Water
 Analysis Batch: 91384

Client Sample ID: Lab Control Sample
 Prep Type: Total/NA

Analyte	Spike Added	LCS LCS		Unit	D	%Rec	%Rec. Limits
		Result	Qualifier				
1,2,3-Trichloropropane	0.00500	ND		ug/L		95	80 - 120

Lab Sample ID: 440-40516-2 DU
 Matrix: Water
 Analysis Batch: 91384

Client Sample ID: EMW-3
 Prep Type: Total/NA

Analyte	Sample Sample		DU DU		Unit	D	RPD	RPD Limit
	Result	Qualifier	Result	Qualifier				
1,2,3-Trichloropropane	ND		ND		ug/L		NC	30

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

Lab Sample ID: MB 440-92529/25
 Matrix: Water
 Analysis Batch: 92529

Client Sample ID: Method Blank
 Prep Type: Total/NA

Analyte	MB MB		RL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier						
Benzene	ND		0.50	ug/L			03/18/13 22:37	1
Bromobenzene	ND		1.0	ug/L			03/18/13 22:37	1
Bromochloromethane	ND		1.0	ug/L			03/18/13 22:37	1
Bromodichloromethane	ND		1.0	ug/L			03/18/13 22:37	1
Bromoform	ND		1.0	ug/L			03/18/13 22:37	1
Bromomethane	ND		1.0	ug/L			03/18/13 22:37	1
Carbon tetrachloride	ND		0.50	ug/L			03/18/13 22:37	1
Chlorobenzene	ND		1.0	ug/L			03/18/13 22:37	1
Chloroethane	ND		1.0	ug/L			03/18/13 22:37	1
Chloroform	ND		1.0	ug/L			03/18/13 22:37	1
Chloromethane	ND		1.0	ug/L			03/18/13 22:37	1
2-Chlorotoluene	ND		1.0	ug/L			03/18/13 22:37	1
4-Chlorotoluene	ND		1.0	ug/L			03/18/13 22:37	1
cis-1,2-Dichloroethene	ND		1.0	ug/L			03/18/13 22:37	1
cis-1,3-Dichloropropene	ND		0.50	ug/L			03/18/13 22:37	1
Dibromochloromethane	ND		1.0	ug/L			03/18/13 22:37	1
1,2-Dibromo-3-Chloropropane	ND		5.0	ug/L			03/18/13 22:37	1
1,2-Dibromoethane (EDB)	ND		1.0	ug/L			03/18/13 22:37	1
Dibromomethane	ND		1.0	ug/L			03/18/13 22:37	1
1,2-Dichlorobenzene	ND		1.0	ug/L			03/18/13 22:37	1
1,3-Dichlorobenzene	ND		1.0	ug/L			03/18/13 22:37	1
1,4-Dichlorobenzene	ND		1.0	ug/L			03/18/13 22:37	1
Dichlorodifluoromethane	ND		5.0	ug/L			03/18/13 22:37	1
1,1-Dichloroethane	ND		1.0	ug/L			03/18/13 22:37	1
1,2-Dichloroethane	ND		0.50	ug/L			03/18/13 22:37	1

TestAmerica Irvine



QC Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

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

Lab Sample ID: MB 440-92529/25

Matrix: Water

Analysis Batch: 92529

Client Sample ID: Method Blank

Prep Type: Total/NA

Analyte	MB	MB	RL	Unit	D	Prepared	Analyzed	Dil Fac
	Result	Qualifier						
1,1-Dichloroethene	ND		1.0	ug/L			03/18/13 22:37	1
1,2-Dichloropropane	ND		1.0	ug/L			03/18/13 22:37	1
1,3-Dichloropropane	ND		1.0	ug/L			03/18/13 22:37	1
2,2-Dichloropropane	ND		1.0	ug/L			03/18/13 22:37	1
1,1-Dichloropropene	ND		1.0	ug/L			03/18/13 22:37	1
Ethylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
Hexachlorobutadiene	ND		1.0	ug/L			03/18/13 22:37	1
Isopropylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
Methylene Chloride	ND		5.0	ug/L			03/18/13 22:37	1
m,p-Xylene	ND		1.0	ug/L			03/18/13 22:37	1
Naphthalene	ND		1.0	ug/L			03/18/13 22:37	1
n-Butylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
N-Propylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
o-Xylene	ND		0.50	ug/L			03/18/13 22:37	1
p-Isopropyltoluene	ND		1.0	ug/L			03/18/13 22:37	1
sec-Butylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
Styrene	ND		1.0	ug/L			03/18/13 22:37	1
tert-Butylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
1,1,1,2-Tetrachloroethane	ND		1.0	ug/L			03/18/13 22:37	1
1,1,2,2-Tetrachloroethane	ND		1.0	ug/L			03/18/13 22:37	1
Tetrachloroethene	ND		1.0	ug/L			03/18/13 22:37	1
Toluene	ND		1.0	ug/L			03/18/13 22:37	1
trans-1,2-Dichloroethene	ND		1.0	ug/L			03/18/13 22:37	1
trans-1,3-Dichloropropene	ND		0.50	ug/L			03/18/13 22:37	1
1,2,3-Trichlorobenzene	ND		1.0	ug/L			03/18/13 22:37	1
1,2,4-Trichlorobenzene	ND		1.0	ug/L			03/18/13 22:37	1
1,1,1-Trichloroethane	ND		1.0	ug/L			03/18/13 22:37	1
1,1,2-Trichloroethane	ND		1.0	ug/L			03/18/13 22:37	1
Trichloroethene	ND		1.0	ug/L			03/18/13 22:37	1
Trichlorofluoromethane	ND		1.0	ug/L			03/18/13 22:37	1
1,2,4-Trimethylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
1,3,5-Trimethylbenzene	ND		1.0	ug/L			03/18/13 22:37	1
Vinyl chloride	ND		0.50	ug/L			03/18/13 22:37	1

Surrogate	MB	MB	Limits	Prepared	Analyzed	Dil Fac
	%Recovery	Qualifier				
4-Bromofluorobenzene (Surr)	93		80 - 120		03/18/13 22:37	1
Dibromofluoromethane (Surr)	86		80 - 120		03/18/13 22:37	1
Toluene-d8 (Surr)	97		80 - 120		03/18/13 22:37	1

Lab Sample ID: LCS 440-92529/4

Matrix: Water

Analysis Batch: 92529

Client Sample ID: Lab Control Sample

Prep Type: Total/NA

Analyte	Spike Added	LCS		Unit	D	%Rec	%Rec. Limits
		Result	Qualifier				
Benzene	25.0	21.1		ug/L		84	70 - 120
Bromobenzene	25.0	25.5		ug/L		102	75 - 120
Bromochloromethane	25.0	24.7		ug/L		99	70 - 130
Bromodichloromethane	25.0	24.1		ug/L		97	70 - 135

TestAmerica Irvine

QC Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

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

Lab Sample ID: LCS 440-92529/4

Matrix: Water

Analysis Batch: 92529

Client Sample ID: Lab Control Sample
 Prep Type: Total/NA

Analyte	Spike Added	LCS	LCS	Unit	D	%Rec	%Rec. Limits
		Result	Qualifier				
Bromoform	25.0	23.6		ug/L		94	55 - 130
Bromomethane	25.0	24.3		ug/L		97	65 - 140
Carbon tetrachloride	25.0	25.7		ug/L		103	65 - 140
Chlorobenzene	25.0	23.4		ug/L		94	75 - 120
Chloroethane	25.0	23.7		ug/L		95	60 - 140
Chloroform	25.0	21.6		ug/L		87	70 - 130
Chloromethane	25.0	25.2		ug/L		101	50 - 140
2-Chlorotoluene	25.0	21.9		ug/L		87	70 - 125
4-Chlorotoluene	25.0	21.9		ug/L		88	75 - 125
cis-1,2-Dichloroethene	25.0	23.0		ug/L		92	70 - 125
cis-1,3-Dichloropropene	25.0	25.3		ug/L		101	75 - 125
Dibromochloromethane	25.0	25.7		ug/L		103	70 - 140
1,2-Dibromo-3-Chloropropane	25.0	21.2		ug/L		85	50 - 135
1,2-Dibromoethane (EDB)	25.0	24.2		ug/L		97	75 - 125
Dibromomethane	25.0	24.8		ug/L		99	70 - 125
1,2-Dichlorobenzene	25.0	24.4		ug/L		98	75 - 120
1,3-Dichlorobenzene	25.0	25.3		ug/L		101	75 - 120
1,4-Dichlorobenzene	25.0	24.4		ug/L		98	75 - 120
Dichlorodifluoromethane	25.0	22.4		ug/L		89	35 - 155
1,1-Dichloroethane	25.0	21.6		ug/L		86	70 - 125
1,2-Dichloroethane	25.0	23.8		ug/L		95	60 - 140
1,1-Dichloroethene	25.0	22.4		ug/L		90	70 - 125
1,2-Dichloropropane	25.0	21.8		ug/L		87	70 - 125
1,3-Dichloropropane	25.0	20.7		ug/L		83	70 - 120
2,2-Dichloropropane	25.0	24.2		ug/L		97	65 - 140
1,1-Dichloropropene	25.0	20.6		ug/L		82	75 - 130
Ethylbenzene	25.0	21.3		ug/L		85	75 - 125
Hexachlorobutadiene	25.0	22.4		ug/L		90	65 - 135
Isopropylbenzene	25.0	25.3		ug/L		101	75 - 130
Methylene Chloride	25.0	19.9		ug/L		80	55 - 130
m,p-Xylene	50.0	43.1		ug/L		86	75 - 125
Naphthalene	25.0	23.5		ug/L		94	55 - 135
n-Butylbenzene	25.0	22.1		ug/L		88	70 - 130
N-Propylbenzene	25.0	22.5		ug/L		90	75 - 130
o-Xylene	25.0	22.5		ug/L		90	75 - 125
p-Isopropyltoluene	25.0	24.2		ug/L		97	75 - 125
sec-Butylbenzene	25.0	22.6		ug/L		90	70 - 125
Styrene	25.0	24.3		ug/L		97	75 - 130
tert-Butylbenzene	25.0	23.8		ug/L		95	70 - 125
1,1,1,2-Tetrachloroethane	25.0	27.7		ug/L		111	70 - 130
1,1,2,2-Tetrachloroethane	25.0	23.2		ug/L		93	55 - 130
Tetrachloroethene	25.0	25.4		ug/L		102	70 - 125
Toluene	25.0	22.1		ug/L		89	70 - 120
trans-1,2-Dichloroethene	25.0	22.2		ug/L		89	70 - 125
trans-1,3-Dichloropropene	25.0	23.9		ug/L		95	70 - 125
1,2,3-Trichlorobenzene	25.0	22.4		ug/L		89	65 - 125
1,2,4-Trichlorobenzene	25.0	22.8		ug/L		91	70 - 135
1,1,1-Trichloroethane	25.0	24.2		ug/L		97	65 - 135

TestAmerica Irvine



QC Sample Results

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

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

Lab Sample ID: LCS 440-92529/4			Client Sample ID: Lab Control Sample						
Matrix: Water			Prep Type: Total/NA						
Analysis Batch: 92529									
Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits		
1,1,2-Trichloroethane	25.0	22.8		ug/L		91	70 - 125		
Trichloroethene	25.0	26.1		ug/L		104	70 - 125		
Trichlorofluoromethane	25.0	27.0		ug/L		108	65 - 145		
1,2,3-Trichloropropane	25.0	20.4		ug/L		82	60 - 130		
1,2,4-Trimethylbenzene	25.0	23.9		ug/L		96	75 - 125		
1,3,5-Trimethylbenzene	25.0	24.2		ug/L		97	75 - 125		
Vinyl chloride	25.0	27.6		ug/L		110	55 - 135		
Surrogate			LCS %Recovery	LCS Qualifier	Limits				
4-Bromofluorobenzene (Surr)			91		80 - 120				
Dibromofluoromethane (Surr)			94		80 - 120				
Toluene-d8 (Surr)			99		80 - 120				

Lab Sample ID: 440-40828-A-1 MS			Client Sample ID: Matrix Spike						
Matrix: Water			Prep Type: Total/NA						
Analysis Batch: 92529									
Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Benzene	ND		25.0	20.4		ug/L		82	65 - 125
Bromobenzene	ND		25.0	25.0		ug/L		100	70 - 125
Bromochloromethane	ND		25.0	23.1		ug/L		93	65 - 135
Bromodichloromethane	ND		25.0	23.8		ug/L		95	70 - 135
Bromoform	ND		25.0	23.5		ug/L		94	55 - 135
Bromomethane	ND		25.0	22.6		ug/L		90	55 - 145
Carbon tetrachloride	ND		25.0	26.3		ug/L		105	65 - 140
Chlorobenzene	ND		25.0	23.0		ug/L		92	75 - 125
Chloroethane	ND		25.0	22.3		ug/L		89	55 - 140
Chloroform	ND		25.0	20.1		ug/L		80	65 - 135
Chloromethane	ND		25.0	24.0		ug/L		96	45 - 145
2-Chlorotoluene	ND		25.0	21.1		ug/L		85	65 - 135
4-Chlorotoluene	ND		25.0	21.3		ug/L		85	70 - 135
cis-1,2-Dichloroethene	ND		25.0	21.5		ug/L		86	65 - 130
cis-1,3-Dichloropropene	ND		25.0	24.7		ug/L		99	70 - 130
Dibromochloromethane	ND		25.0	25.2		ug/L		101	65 - 140
1,2-Dibromo-3-Chloropropane	ND		25.0	21.1		ug/L		84	45 - 145
1,2-Dibromoethane (EDB)	ND		25.0	24.4		ug/L		98	70 - 130
Dibromomethane	ND		25.0	24.2		ug/L		97	65 - 135
1,2-Dichlorobenzene	ND		25.0	24.0		ug/L		96	75 - 125
1,3-Dichlorobenzene	ND		25.0	24.8		ug/L		99	75 - 125
1,4-Dichlorobenzene	ND		25.0	24.4		ug/L		98	75 - 125
Dichlorodifluoromethane	ND		25.0	21.5		ug/L		86	25 - 155
1,1-Dichloroethane	ND		25.0	20.3		ug/L		81	65 - 130
1,2-Dichloroethane	ND		25.0	23.4		ug/L		94	60 - 140
1,1-Dichloroethene	ND		25.0	21.7		ug/L		87	60 - 130
1,2-Dichloropropane	ND		25.0	21.0		ug/L		84	65 - 130
1,3-Dichloropropane	ND		25.0	21.0		ug/L		84	65 - 135
2,2-Dichloropropane	ND		25.0	23.9		ug/L		95	60 - 145
1,1-Dichloropropene	ND		25.0	20.6		ug/L		82	70 - 135

TestAmerica Irvine

QC Sample Results

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

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

Lab Sample ID: 440-40828-A-1 MS

Matrix: Water

Analysis Batch: 92529

Client Sample ID: Matrix Spike

Prep Type: Total/NA

Analyte	Sample	Sample	Spike	MS	MS	Unit	D	%Rec	%Rec.	Limits
	Result	Qualifier		Added	Result					
Ethylbenzene	ND		25.0	21.3		ug/L		85	65 - 130	
Hexachlorobutadiene	ND		25.0	22.5		ug/L		90	60 - 135	
Isopropylbenzene	ND		25.0	25.1		ug/L		100	70 - 135	
Methylene Chloride	ND		25.0	18.8		ug/L		75	50 - 135	
m,p-Xylene	ND		50.0	43.5		ug/L		87	65 - 130	
Naphthalene	ND		25.0	22.9		ug/L		91	50 - 140	
n-Butylbenzene	ND		25.0	22.3		ug/L		89	65 - 135	
N-Propylbenzene	ND		25.0	22.3		ug/L		89	70 - 135	
o-Xylene	ND		25.0	22.3		ug/L		89	65 - 125	
p-Isopropyltoluene	ND		25.0	24.4		ug/L		97	65 - 130	
sec-Butylbenzene	ND		25.0	22.7		ug/L		91	70 - 125	
Styrene	ND		25.0	23.9		ug/L		96	50 - 145	
tert-Butylbenzene	ND		25.0	23.8		ug/L		95	65 - 130	
1,1,1,2-Tetrachloroethane	ND		25.0	27.5		ug/L		110	65 - 140	
1,1,2,2-Tetrachloroethane	ND		25.0	22.9		ug/L		92	55 - 135	
Tetrachloroethene	ND		25.0	26.0		ug/L		104	65 - 130	
Toluene	ND		25.0	21.5		ug/L		86	70 - 125	
trans-1,2-Dichloroethene	ND		25.0	21.0		ug/L		84	65 - 130	
trans-1,3-Dichloropropene	ND		25.0	23.4		ug/L		93	65 - 135	
1,2,3-Trichlorobenzene	ND		25.0	21.7		ug/L		87	60 - 135	
1,2,4-Trichlorobenzene	ND		25.0	22.6		ug/L		90	65 - 135	
1,1,1-Trichloroethane	ND		25.0	23.7		ug/L		95	65 - 140	
1,1,2-Trichloroethane	ND		25.0	22.3		ug/L		89	65 - 130	
Trichloroethene	ND		25.0	25.5		ug/L		102	65 - 125	
Trichlorofluoromethane	ND		25.0	27.0		ug/L		108	60 - 145	
1,2,3-Trichloropropane	ND		25.0	20.2		ug/L		81	55 - 135	
1,2,4-Trimethylbenzene	ND		25.0	23.6		ug/L		94	55 - 135	
1,3,5-Trimethylbenzene	ND		25.0	23.8		ug/L		95	70 - 130	
Vinyl chloride	ND		25.0	26.7		ug/L		107	45 - 140	

Surrogate	MS	MS	Limits
	%Recovery	Qualifier	
4-Bromofluorobenzene (Surr)	93		80 - 120
Dibromofluoromethane (Surr)	90		80 - 120
Toluene-d8 (Surr)	99		80 - 120

Lab Sample ID: 440-40828-A-1 MSD

Matrix: Water

Analysis Batch: 92529

Client Sample ID: Matrix Spike Duplicate

Prep Type: Total/NA

Analyte	Sample	Sample	Spike	MSD	MSD	Unit	D	%Rec	%Rec.	RPD	RPD	Limit
	Result	Qualifier		Added	Result							
Benzene	ND		25.0	20.7		ug/L		83	65 - 125	1	20	
Bromobenzene	ND		25.0	25.1		ug/L		100	70 - 125	0	20	
Bromochloromethane	ND		25.0	23.9		ug/L		96	65 - 135	3	25	
Bromodichloromethane	ND		25.0	23.8		ug/L		95	70 - 135	0	20	
Bromoform	ND		25.0	23.2		ug/L		93	55 - 135	1	25	
Bromomethane	ND		25.0	23.6		ug/L		94	55 - 145	4	25	
Carbon tetrachloride	ND		25.0	26.8		ug/L		107	65 - 140	2	25	
Chlorobenzene	ND		25.0	23.1		ug/L		93	75 - 125	1	20	

TestAmerica Irvine

QC Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

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

Lab Sample ID: 440-40828-A-1 MSD

Client Sample ID: Matrix Spike Duplicate

Matrix: Water

Prep Type: Total/NA

Analysis Batch: 92529

Analyte	Sample	Sample	Spike	MSD	MSD	Unit	D	%Rec	%Rec.	RPD	RPD
	Result	Qualifier	Added	Result	Qualifier				Limits		Limit
Chloroethane	ND		25.0	23.4		ug/L		94	55 - 140	5	25
Chloroform	ND		25.0	20.9		ug/L		84	65 - 135	4	20
Chloromethane	ND		25.0	24.6		ug/L		98	45 - 145	2	25
2-Chlorotoluene	ND		25.0	21.6		ug/L		86	65 - 135	2	20
4-Chlorotoluene	ND		25.0	21.8		ug/L		87	70 - 135	2	20
cis-1,2-Dichloroethene	ND		25.0	22.5		ug/L		90	65 - 130	4	20
cis-1,3-Dichloropropene	ND		25.0	24.7		ug/L		99	70 - 130	0	20
Dibromochloromethane	ND		25.0	25.3		ug/L		101	65 - 140	1	25
1,2-Dibromo-3-Chloropropane	ND		25.0	19.8		ug/L		79	45 - 145	6	30
1,2-Dibromoethane (EDB)	ND		25.0	23.7		ug/L		95	70 - 130	3	25
Dibromomethane	ND		25.0	23.9		ug/L		96	65 - 135	1	25
1,2-Dichlorobenzene	ND		25.0	23.9		ug/L		95	75 - 125	1	20
1,3-Dichlorobenzene	ND		25.0	25.1		ug/L		100	75 - 125	1	20
1,4-Dichlorobenzene	ND		25.0	24.2		ug/L		97	75 - 125	1	20
Dichlorodifluoromethane	ND		25.0	22.5		ug/L		90	25 - 155	5	30
1,1-Dichloroethane	ND		25.0	20.8		ug/L		83	65 - 130	2	20
1,2-Dichloroethane	ND		25.0	23.4		ug/L		94	60 - 140	0	20
1,1-Dichloroethene	ND		25.0	22.3		ug/L		89	60 - 130	3	20
1,2-Dichloropropane	ND		25.0	21.1		ug/L		84	65 - 130	0	20
1,3-Dichloropropane	ND		25.0	20.6		ug/L		82	65 - 135	2	25
2,2-Dichloropropane	ND		25.0	24.9		ug/L		100	60 - 145	4	25
1,1-Dichloropropene	ND		25.0	20.7		ug/L		83	70 - 135	1	20
Ethylbenzene	ND		25.0	21.4		ug/L		86	65 - 130	0	20
Hexachlorobutadiene	ND		25.0	22.5		ug/L		90	60 - 135	0	20
Isopropylbenzene	ND		25.0	25.7		ug/L		103	70 - 135	2	20
Methylene Chloride	ND		25.0	18.9		ug/L		76	50 - 135	1	20
m,p-Xylene	ND		50.0	43.4		ug/L		87	65 - 130	0	25
Naphthalene	ND		25.0	22.1		ug/L		89	50 - 140	3	30
n-Butylbenzene	ND		25.0	22.4		ug/L		89	65 - 135	0	20
N-Propylbenzene	ND		25.0	22.6		ug/L		90	70 - 135	1	20
o-Xylene	ND		25.0	22.2		ug/L		89	65 - 125	0	20
p-Isopropyltoluene	ND		25.0	24.5		ug/L		98	65 - 130	1	20
sec-Butylbenzene	ND		25.0	22.9		ug/L		92	70 - 125	1	20
Styrene	ND		25.0	23.7		ug/L		95	50 - 145	1	30
tert-Butylbenzene	ND		25.0	23.9		ug/L		96	65 - 130	1	20
1,1,1,2-Tetrachloroethane	ND		25.0	27.5		ug/L		110	65 - 140	0	20
1,1,2,2-Tetrachloroethane	ND		25.0	22.5		ug/L		90	55 - 135	2	30
Tetrachloroethene	ND		25.0	26.1		ug/L		104	65 - 130	0	20
Toluene	ND		25.0	21.6		ug/L		86	70 - 125	1	20
trans-1,2-Dichloroethene	ND		25.0	21.9		ug/L		88	65 - 130	4	20
trans-1,3-Dichloropropene	ND		25.0	23.5		ug/L		94	65 - 135	1	25
1,2,3-Trichlorobenzene	ND		25.0	21.6		ug/L		86	60 - 135	0	20
1,2,4-Trichlorobenzene	ND		25.0	22.6		ug/L		90	65 - 135	0	20
1,1,1-Trichloroethane	ND		25.0	24.7		ug/L		99	65 - 140	4	20
1,1,2-Trichloroethane	ND		25.0	21.9		ug/L		88	65 - 130	2	25
Trichloroethene	ND		25.0	25.8		ug/L		103	65 - 125	1	20
Trichlorofluoromethane	ND		25.0	27.8		ug/L		111	60 - 145	3	25
1,2,3-Trichloropropane	ND		25.0	19.7		ug/L		79	55 - 135	3	30

TestAmerica Irvine

QC Sample Results

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

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

Lab Sample ID: 440-40828-A-1 MSD				Client Sample ID: Matrix Spike Duplicate								
Matrix: Water				Prep Type: Total/NA								
Analysis Batch: 92529												
Analyte	Sample	Sample	Spike	MSD	MSD	Unit	D	%Rec	%Rec.	RPD	RPD	
	Result	Qualifier	Added	Result	Qualifier				Limits			Limit
1,2,4-Trimethylbenzene	ND		25.0	23.7		ug/L		95	55 - 135	1	25	
1,3,5-Trimethylbenzene	ND		25.0	24.2		ug/L		97	70 - 130	2	20	
Vinyl chloride	ND		25.0	28.0		ug/L		112	45 - 140	5	30	
Surrogate	MSD	MSD										
	%Recovery	Qualifier	Limits									
4-Bromofluorobenzene (Surr)	90		80 - 120									
Dibromofluoromethane (Surr)	94		80 - 120									
Toluene-d8 (Surr)	99		80 - 120									



QC Association Summary

Client: ENVIRON International Corp.
 Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

GC/MS VOA

Analysis Batch: 91384

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-40516-2	EMW-3	Total/NA	Water	524.2M_CA-SRL	
440-40516-2 DU	EMW-3	Total/NA	Water	524.2M_CA-SRL	
440-40516-3	EMW-2	Total/NA	Water	524.2M_CA-SRL	
440-40516-4	MW-200	Total/NA	Water	524.2M_CA-SRL	
440-40516-5	EMW-1	Total/NA	Water	524.2M_CA-SRL	
440-40516-6	MW-100	Total/NA	Water	524.2M_CA-SRL	
LCS 440-91384/2	Lab Control Sample	Total/NA	Water	524.2M_CA-SRL	
MB 440-91384/3	Method Blank	Total/NA	Water	524.2M_CA-SRL	

Analysis Batch: 92529

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
440-40516-1	MW-300	Total/NA	Water	8260B	
440-40516-2	EMW-3	Total/NA	Water	8260B	
440-40516-3	EMW-2	Total/NA	Water	8260B	
440-40516-3 - DL	EMW-2	Total/NA	Water	8260B	
440-40516-4	MW-200	Total/NA	Water	8260B	
440-40516-5	EMW-1	Total/NA	Water	8260B	
440-40516-5 - DL	EMW-1	Total/NA	Water	8260B	
440-40516-6	MW-100	Total/NA	Water	8260B	
440-40516-6 - DL	MW-100	Total/NA	Water	8260B	
440-40828-A-1 MS	Matrix Spike	Total/NA	Water	8260B	
440-40828-A-1 MSD	Matrix Spike Duplicate	Total/NA	Water	8260B	
LCS 440-92529/4	Lab Control Sample	Total/NA	Water	8260B	
MB 440-92529/25	Method Blank	Total/NA	Water	8260B	



Definitions/Glossary

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
□	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CNF	Contains no Free Liquid
DER	Duplicate error ratio (normalized absolute difference)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision level concentration
MDA	Minimum detectable activity
EDL	Estimated Detection Limit
MDC	Minimum detectable concentration
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
ND	Not detected at the reporting limit (or MDL or EDL if shown)
PQL	Practical Quantitation Limit
QC	Quality Control
RER	Relative error ratio
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)



Certification Summary

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Laboratory: TestAmerica Irvine

All certifications held by this laboratory are listed. Not all certifications are applicable to this report.

Authority	Program	EPA Region	Certification ID	Expiration Date
Alaska	State Program	10	CA01531	06-30-13
Arizona	State Program	9	AZ0671	10-13-13
California	LA Cty Sanitation Districts	9	10256	01-31-14
California	NELAP	9	1108CA	01-31-14
California	State Program	9	2706	06-30-14
Guam	State Program	9	Cert. No. 12.002r	03-28-13
Hawaii	State Program	9	N/A	01-31-14
Nevada	State Program	9	CA015312007A	07-31-13
New Mexico	State Program	6	N/A	03-28-13
Northern Mariana Islands	State Program	9	MP0002	03-28-13
Oregon	NELAP	10	4005	09-12-13
USDA	Federal		P330-09-00080	06-06-14
USEPA UCMR	Federal	1	CA01531	01-31-15



Method Summary

Client: ENVIRON International Corp.
Project/Site: Agere, Alhambra/04-13476Q

TestAmerica Job ID: 440-40516-1

Method	Method Description	Protocol	Laboratory
524.2M_CA-SRL	Volatile Organic Compounds (GC/MS SIM)	CADHS	TAL IRV
8260B	Volatile Organic Compounds (GC/MS)	SW846	TAL IRV

Protocol References:

CADHS = California Department of Health Services

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

Laboratory References:

TAL IRV = TestAmerica Irvine, 17461 Derian Ave, Suite 100, Irvine, CA 92614-5817, TEL (949)261-1022



ENVIRON

18100 Van Kaman Ave., Ste 600
 Los Angeles, Calif. 90017
 (818) 261-5151
 (818) 261-6202 (fax)

CHAIN-of-CUSTODY

NO 07157

PAGE 1 of 1

MSA#: _____ WO#: 440-40516

FIELD PERSON: M. Henry-Luna

PROJECT MANAGER: J. Raumin

LABORATORY: Test America

PROJECT NAME / FACILITY ID: Agere

PROJECT NUMBER: 04-13476

PROJECT LOCATION: Avonbra, CA

DATE: 3/11/13

IS THIS A UST PROJECT OR IS EDF REQUIRED? Y N IF YES, GLOBAL ID #:

SAMPLER: M. Henry-Luna SIGNATURE: <i>M. Henry-Luna</i>	YEAR: 2013	SAMPLE DATE	SAMPLE TIME	SAMPLE DEPTH	AIR SAMPLE VOLUME (L)	MATRIX (A) AIR (S) SOL. (G) GAS (W) WATER	NUMBER OF CONTAINERS	FILTERED/UNFILTERED (F/U)	PRESERVATION (SEE KEY)	ANALYSIS REQUIRED	COMMENTS
MW-300	3/11/13	11:00	180'	1	3	3	2	0	#	X	*5 ug/L detection limit, multiple dilutions for lower detections.
EMW-3	3/11/13	11:00	180'	1	3	3	5	0	#	X	
EMW-2	3/11/13	11:00	180'	1	3	3	5	0	#	X	
MW-200	3/11/13	11:00	180'	1	3	3	5	0	#	X	
EMW-1	3/11/13	11:00	180'	1	3	3	5	0	#	X	Please email results to: jraumin@environcorp.com
MW-100	3/11/13	11:00	180'	1	3	3	5	0	#	X	
TOTAL											

RELINQUISHED BY: _____ TIME/DATE: _____

RECEIVED BY: _____ (COMPANY): _____ TIME/DATE: _____

TURNAROUND TIME (CIRCLE ONE) SAMEDAY 24 HOURS 48 HOURS

72 HOURS 5 DAYS

IF SEALED, SEAL INTEGRITY: NORMAL

SAMPLE INTEGRITY: INTACT: Y N Temp: 33°C

RECEIVED BY: _____ (COMPANY): _____ TIME/DATE: _____

RECEIVED BY: _____ (COMPANY): _____ TIME/DATE: _____

RECEIVED BY: _____ (COMPANY): _____ TIME/DATE: _____



Login Sample Receipt Checklist

Client: ENVIRON International Corp.

Job Number: 440-40516-1

Login Number: 40516

List Source: TestAmerica Irvine

List Number: 1

Creator: Freitag, Kevin R

Question	Answer	Comment
Radioactivity wasn't checked or is \leq background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	M. Henry-Luna
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <math><6\text{mm}</math> (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	



EXHIBIT 8

Jocelyn T. de Grandpre
Division Counsel
1110 American Parkway, NE
Room 12J-306
Allentown, PA 18109
United States of America

P (610) 712-1634
F (610) 712-1450
jocelyn.degrandpre@lsi.com



February 5, 2010

Tracy J. Egoscue
320 W. 4th Street, Suite 200
Los Angeles, California 90013

Via Electronic Transmission and Certified Mail

Re: Cleanup and Abatement Order No. R4-2010-0008 dated January 29, 2010, issued to LSI Corporation, File No. 115.0003, Site ID No. 2040293

Dear Ms. Egoscue:

We are writing in response to the letter dated January 29, 2010 from the California Regional Water Quality Control Board, Los Angeles Region, and the enclosed Comments Letter and Cleanup and Abatement Order (collectively "CAO Communication"). LSI is providing this response to all recipients of Curt Charmley's February 1, 2010 e-mail distribution of the CAO Communication, as well as to Mr. Arthur Heath, Mr. Dixon Oriola, and Mr. James Collins (US EPA Assistant Regional Counsel), due to LSI's desire to immediately notify all such individuals of the fundamental errors in the CAO Communication.

LSI requests that the Board promptly withdraw the CAO in view of such fundamental errors. If such action is not taken, LSI will file the necessary petition with the State Water Board to address these and other issues in the CAO.

Fundamental Error #1: The CAO Treats Groundwater Well Purge Water as Evidence of TCE Use By Agere

Paragraph 8(a) of the CAO states that "[a] limited review of available records obtained from [DTSC]..., from May 1999 through 2009, documents that trichloroethylene (TCE), a chlorinated solvent was used onsite and generated a waste by-product classified under [RCRA]... as a hazardous waste.... specific information provided by the DTSC... includes manifests that indicate designated wastes classified specifically as composed of TCE... were removed and transported to waste disposal facilities (Appendix C). The waste manifests indicate that the

volume of TCE sent to the treatment, storage, and disposal facilities (TSDFs) for this 10-year period totaled 1,445 gallons (Appendix D).”

Paragraph 8(b) of the CAO goes on to state that “[t]he limited review of hazardous waste records obtained from the DTSC clearly substantiates the use of the chlorinated solvents, including TCE, on-site. This information contradicts information provided to Regional Board staff by ENVIRON, consultant to LSI Corporation and LSI representatives during a presentation held on June 2, 2009.... LSI represented that no records exist with the exception of one 1995 waste manifest concerning the use of TCE.”

Similarly, in the “Comments to LSI Corporation Letter Dated (Former Agere Systems) Emcore [sic]...- 2015 West Chestnut Street, Alhambra, California,” the comments stated that “[a]ttachments to the revised Order include copies of the waste records that indicate significant amounts of TCE were used on-site during Ortel/Agere’s occupancy of the property, from 1999 through 2009.”

Appendix C to the CAO provides copies of seven manifests. The manifest dated February 28, 1995, is the same manifest that LSI discussed during its prior communications with the RWQCB and EPA. It is for 10 gallons of “TCE/Hydroquinone mix” and is expressly coded 551 (the California Hazardous Waste Code for waste laboratory chemicals). As explained in our response to EPA’s CERCLA Section 104(e) request in 2003 and again to the RWQCB, the facility manager that helped assemble the documents for Agere’s response to EPA believed that this material was from earlier research and development activities. (As noted above, the material was specifically coded as lab waste.)

The remaining six manifests are all for quantities of groundwater well purge water generated by Agere/LSI in the course of the groundwater investigation mandated by the RWQCB from 2006 to 2009. Each manifest relates to a particular groundwater sampling event. All groundwater sampling events were reported to the RWQCB in technical reports, as required by the RWQCB. Moreover, all manifests relate to the period after Agere’s sale of the assets to Emcore in January 2003, and therefore of course, under no circumstances, could evidence on-site TCE use by Agere. It is appalling to LSI that Regional Board staff would have concluded, without checking their own files, that these groundwater well purge water manifests “indicate significant amounts of TCE were used on-site during Ortel/Agere’s occupancy of the property.” These manifests indicate nothing of the kind. All they indicate is that Agere/LSI took environmentally responsible steps to dispose of extracted groundwater containing TCE. (No one contests that TCE is in the groundwater and soil gas. The only issue is the source of the TCE.) Had Regional Board staff contacted LSI to discuss these six manifests we could have pointed out their error.

Although Appendix C to the CAO contains seven manifests, the table in Appendix D to the CAO lists eight manifests, including a May 12, 1992 manifest for 55 gallons of “TCE mix.” Appendix C does not include a copy of this previously unknown manifest. Given what Mark Kanipe, the former Ortel facility environmental manager, said about other errors that had been made in profiling wastes disposed of by Ortel (as reported in Agere’s response to EPA’s information request), this manifest may well be inaccurate. LSI has previously requested that Regional Board staff provide copies of all new information, but has received no response to that request other than issuance of the CAO and its appendices. LSI requests that the Regional Board promptly provide a copy of the May 12, 1992 manifest for review and investigation by LSI.

Fundamental Error #2: The CAO Treats Manifests Relating to 1,1,1-TCA Disposal As If They Were Relevant

Paragraph 9(h) of the CAO states that “[t]he compound 1,4 dioxane (a solvent stabilizer) is commonly used in association with the solvent TCA. The volume of TCA hazardous waste transported off-site from the facility during the period from November 1991 through May, 2000 totaled 5,893 gallons.” (Paragraph 8(a) also cites this disposal volume.)

Setting aside for now the question of whether the manifests are accurate in their references to 1,1,1-TCA (as described previously to EPA and the RWQCB, many such references were inaccurate), the CAO implies that the volume of off-site disposal of TCA is somehow relevant to the issue of whether Ortel released TCE or 1,4-dioxane to soil and groundwater beneath the facility at 2015 West Chestnut. This implication ignores the fact that no 1,1,1-TCA has been detected in soil gas or groundwater beneath the facility, as demonstrated by the groundwater sampling required by and reported to the RWQCB. If the detections of 1,4-dioxane beneath the facility were related to releases of 1,1,1-TCA, the latter chemical would most likely have been detected with the 1,4-dioxane. The absence of 1,1,1-TCA from soil gas and groundwater supports LSI’s view that Ortel did not release solvents to the soil or groundwater beneath the facility.

LSI Has Not Been Treated As a Cooperative Party

As noted above, the CAO stated in Paragraph 8(b) that the information obtained from the DTSC contradicted information provided by LSI representatives on June 2, 2009 regarding TCE use at the facility. The assertions in Paragraph 8(b) could be read as implying that LSI had made misrepresentations to Regional Board staff. As discussed above, the manifests provided with the CAO in no way contradict the information previously provided by LSI. LSI is shocked that the RWQCB would raise such implications in a public document without confirming the facts first. When Regional Board staff last communicated with LSI, none of this information was presented, no explanation was given for rejection of the offer extended by LSI in its September 29 letter to undertake work at the site, and staff refused to answer any questions regarding the basis for the Regional Board’s rejection of the offer. (Staff also indicated that the next step would be issuance of a new draft CAO, which did not take place.) In view of Agere’s and now LSI’s long history of cooperation at the site, such treatment is unwarranted.

LSI remains willing to undertake work at the site consistent with the offer extended in our September 29, 2009 letter, subject to withdrawal of the CAO. We invite the RWQCB to contact us to discuss that offer while we are working on our petition for review of the CAO. We also look forward to receiving promptly the manifest requested above.

Sincerely,

 Digitally signed by
Jocelyn de Grandpre
Date: 2010.02.05
12:54:46 -05'00'

Jocelyn de Grandpre

(cc list on next page)

Mr. Wayne Tam and Mrs. Millicent J. Tam
Attn: RIM Development Company
2225 W. Commonwealth Avenue, #206
Alhambra, CA 91801

Mr. Arthur Heath
Mr. Dixon Oriola
Mr. Curt Charmley
Ms. Lisa Hanusiak, Superfund Division, EPA, Region IX
Mr. James Collins, Assistant Regional Counsel, EPA Region IX
Mr. Steven Arbaugh, Investigator, EPA Region IX
Dr. Jackie Spizman, California Department of Toxic Substances Control, Cypress Branch
Dr. Kurt Souza, California Department of Public Health (DPH)
Ms. Carol Williams, Main San Gabriel Basin Watermaster
Ms. Grace Burgess, San Gabriel Basin Water Quality Authority
Mr. Steve Johnson, Stetson Engineers, Inc.

EXHIBIT 9



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

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

Arnold Schwarzenegger
Governor

February 24, 2010

LSI/Agere Systems, Inc.
Attn. Ms. Jocelyn T. de Grandpre
Division Counsel, Room 12J-306
1110 American Parkway NE
Allentown, PA 18109-9138

RESCISSION OF CLEANUP AND ABATEMENT ORDER NO. R4-2010-0008: LSI CORPORATION (FORMER AGERE SYSTEMS) EMCORE, FORMER ORTEL CORPORATION, FORMER LUCENT TECHNOLOGIES - 2015 WEST CHESTNUT STREET, ALHAMBRA, CALIFORNIA (FILE NO. 115.0003, SITE ID NO. 2040293)

The Los Angeles Regional Water Quality Control Board (Regional Board) acknowledges the receipt of your letter dated February 5, 2010. As a result of our review of your statements, Cleanup and Abatement Order (CAO) No. R4-2010-0008 is hereby rescinded.

The Regional Board may reissue a Cleanup and Abatement Order in the future after further review of the evidence.

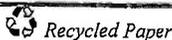
Should you have questions or wish to discuss details, please contact Mr. Dixon Oriola at (213) 576-6803 or Mr. Curt M. Charmley at (213) 576-6774.

Sincerely,

for 
Tracy J. Egoscue
Executive Officer

cc: Ms. Lisa Hanusiak, Superfund Division U.S. EPA, Region IX, San Francisco
Dr. Jackie Spizman, California Department of Toxic Substances Control, Cypress Branch
Mr. Kurt Souza, California Department of Public Health (DPH)
Ms. Carol Williams, Main San Gabriel Basin Watermaster
Ms. Grace Burgess, San Gabriel Basin Water Quality Authority
Mr. Steve Johnson, Stetson Engineers, Inc
Mr. Wayne Tam, RIM Development Company
Mr. Robert Tam, RIM Development Company

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

EXHIBIT 10

1 Kenneth B. Finney
kfinney@bdlaw.com
2 Steven M. Jawetz
sjawetz@bdlaw.com
3 Beveridge & Diamond, P.C.
456 Montgomery Street, Suite 1800
4 San Francisco, CA 94104-1251
Telephone: (415) 262-4000
5 Facsimile: (415) 262-4040

6 Attorneys for Petitioner
LSI CORPORATION
7

8 **BEFORE THE STATE OF CALIFORNIA**
9 **STATE WATER RESOURCES CONTROL BOARD**
10

11 In the Matter of the Petition of
12 LSI CORPORATION
13 For Review of Order No. R4-1013-0099
and Request for Stay
14 California Regional Water Quality
15 Control Board, Los Angeles Region
16

No.

**DECLARATION OF SCOTT D.
HOUTHUYSEN IN SUPPORT OF LSI
CORPORATION'S REQUEST FOR STAY**

**[Concurrently filed with Petition for Review and
Request for Stay]**

17 I, Scott D. Houthuysen, declare:

18 1. I am the Global Director for Environmental, Health and Safety at LSI Corporation
19 ("Petitioner"). The following facts are within my personal knowledge and, if called to testify to the
20 matters stated herein, I could and would competently do so.

21 2. There will be substantial harm to Petitioner if a stay is not granted. Since the State
22 Board has up to 270 days to review an action upon a petition, Petitioner will suffer substantial harm
23 by having to expend resources to develop various work plans and implement work for which it has
24 no liability.

25 3. The costs for performing the work under Cleanup and Abatement No. R4-2013-0099
26 (the "CAO") issued by the California Regional Water Quality Control Board, Los Angeles Region
27 ("Regional Board") through the second quarter of 2014 are estimated to be several hundred thousand
28

1 dollars. A preliminary estimate by Petitioner's environmental consultant indicates that, overall, the
2 Required Actions in the CAO could cost on the order of \$900,000 to \$1.7 million to implement.

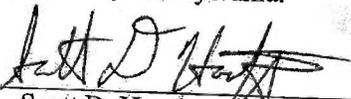
3 4. Petitioner will also experience substantial harm due to the infeasible deadlines
4 established in the CAO, which includes the preparation of certain work plans by as early as October
5 1, 2013.

6 5. There will be no substantial harm to other interested persons or to the public interest
7 because other entities received and can implement the CAO. In addition, the many months or even
8 years that have passed between each of the Regional Board's efforts with regard to the Site
9 demonstrate that the Regional Board does not view this Site as presenting near-term risks.

10 6. As detailed in LSI's Petition for Review and Request for Stay, filed concurrently with
11 this declaration, there are substantial questions of fact and law regarding the issuance of the CAO to
12 LSI and regarding certain required actions in the CAO.

13 I declare under the penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15 Executed this 29th day of August 2013 in Allentown, Pennsylvania.

16 
17 _____
18 Scott D. Houthuysen