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11 Leggett & Platt, Incorporated



12 STATE OF CALIFORNIA

13 STATE WATER RESOURCES CONTROL BOARD

14 IN THE MATTER OF THE PETITION
15 OF LEGGETT & PLATT,
16 INCORPORATED, FOR REVIEW OF
17 WATER CODE SECTION 13267
18 ORDER DATED AUGUST 5, 2010 BY
19 THE CALIFORNIA REGIONAL
20 WATER QUALITY CONTROL BOARD,
21 LOS ANGELES REGION.

Petition No.

PETITION FOR REVIEW PURSUANT TO
WATER CODE SECTION 13320 AND 23 C.C.R.
SECTION §2050 ET SEQ.
[Request To Be Held In Abeyance Under 23
C.C.R. §2050.5(d)]

DECLARATION OF GORDON BILLHEIMER
IN SUPPORT THEREOF FILED
CONCURRENTLY HERewith AND
DECLARATIONS ATTACHED HERETO FROM
PRIOR PETITIONS

22 I. INTRODUCTION

23 Pursuant to Water Code Section 13320 and Title 23 of the California Code of Regulations,
24 Section 2050 et seq., Petitioner Leggett & Platt, Incorporated, a Missouri corporation ("Leggett &
25 Platt") hereby petitions the State Water Resources Control Board ("State Water Board") for
26 review of a Conditional Approval of Work Plan Addendum For Additional Investigation of
27 Groundwater and Soil Gas Pursuant to California Water Code Section 13267 Order issued on
28 August 5, 2010 ("August 5, 2010 Order") by the Executive Officer of the California Regional
Water Quality Control Board, Los Angeles Region ("Regional Water Board"), which would
require Petitioner to submit technical reports, undertake additional soil vapor sampling, prepare a
human health risk assessment and perform semi-annual groundwater sampling, as specified in the
August 5, 2010 Order, relating to soil and groundwater investigation at and about 4900 Valley

1 Boulevard, Los Angeles, California ("Site"). A copy of the August 5, 2010 Order is attached
2 hereto as **Exhibit A**.

3
4 **II. TWO RELATED PETITIONS HAVE BEEN SUBMITTED TO THE STATE**
5 **WATER BOARD AND ARE CURRENTLY BEING HELD IN ABEYANCE**

6 Prior to issuing the August 5, 2010 Order, which is the subject of this Petition, on June 11,
7 2008, the Regional Water Board issued a Section 13267 Order requiring submittal of a work plan
8 for additional investigation of soil and ground water at and about the Site ("June 11, 2008
9 Order").

10 On July 10, 2008, Leggett & Platt filed a Petition For Review Pursuant To Water Code
11 Section 13320 relating to the June 11, 2008 Order ("July 10, 2008 Petition"). In support of the
12 July 10, 2008 Petition, Leggett & Platt simultaneously filed the Declaration of George Linkletter
13 In Support Thereof ("July 10, 2008 Linkletter Declaration"). Additionally, on or about that same
14 date, the owner of the Site, Valley Alhambra Properties ("Valley Alhambra"), filed a Partial
15 Joinder in the July 10, 2008 Petition. Copies of the July 10, 2008 Petition, July 10, 2008
16 Linkletter Declaration and Partial Joinder are attached hereto as **Exhibit B, C and D**,
17 respectively.

18 Concurrently with the filing of the July 10, 2008 Petition, Petitioner submitted a request
19 for reconsideration of the June 11, 2008 Order to the Regional Water Board. A copy of the
20 request for reconsideration is attached hereto as **Exhibit E**. Thus, Petitioner requested that the
21 State Water Board hold the July 10, 2008 Petition in abeyance pursuant to Title 23 of the
22 California Code of Regulations, Section 2050.5(d), pending further good faith discussions
23 between Petitioner and the Regional Water Board.

24 On July 14, 2009, the State Water Board sent Petitioner a letter acknowledging that the
25 July 10, 2008 Petition had been received by the State Water Board and approving Petitioner's
26 request that the July 10, 2008 Petition be held in abeyance. A similar acknowledgment letter was
27 sent to Valley Alhambra in relation to its Partial Joinder in the July 10, 2008 Petition. Copies of
28 both acknowledgement letters are collectively attached hereto as **Exhibit F**. The July 10, 2008

1 Petition has been designated SWRCB/OCC File No. A-1936.

2 In furtherance of Petitioner's request for reconsideration submitted to the Regional Water
3 Board on July 10, 2008, on October 14, 2008, representatives of Leggett & Platt, Valley
4 Alhambra and their consultants with ENVIRON and ARCADIS met with Regional Water Board
5 representatives to discuss the June 11, 2008 Order, July 10, 2008 Petition and supporting July 10,
6 2008 Linkletter Declaration. During that meeting, the Regional Water Board agreed in concept to
7 a work plan for onsite and offsite investigation intended to result in site closure.

8 Consistent with the discussions on October 14, 2008, on November 17, 2008 the parties
9 submitted a Work Plan For Additional Investigation ("Work Plan") to the Regional Water Board.
10 In doing so, however, neither Leggett & Platt nor Valley Alhambra waived their objections to the
11 June 11, 2008 Order or their right to reinstate the July 10, 2008 Petition, which is currently held
12 in abeyance by the State Water Resources Control Board. A copy of a November 17, 2008 letter
13 confirming the parties' discussions on October 14, 2008, and transmitting a copy of the Work
14 Plan to the Regional Water Board, is attached hereto as **Exhibit G**.

15 On November 25, 2008, the Regional Water Board issued a Conditional Approval of
16 Work Plan For Additional Investigation Pursuant to California Water Code Section 13267 Order
17 ("November 25, 2008 Order").

18 On December 24, 2008, Leggett & Platt filed a Petition For Review Pursuant To Water
19 Code Section 13320 relating to the November 25, 2008 Order ("December 24, 2008 Petition").
20 In support of the December 24, 2008 Petition Leggett & Platt simultaneously filed the Declaration
21 of George Linkletter In Support Thereof ("December 22, 2008 Linkletter Declaration").
22 Additionally, on or about that same date, the owner of the Site, Valley Alhambra, filed a Partial
23 Joinder in the December 24, 2008 Petition. Copies of the December 24, 2008 Petition, December
24 22, 2008 Linkletter Declaration and Partial Joinder are attached hereto as **Exhibit H, Exhibit I**
25 and **Exhibit J**, respectively.

26 On December 30, 2008, the State Water Board sent Petitioner a letter acknowledging that
27 the December 24, 2008 Petition had been received by the State Water Board and approving
28 Petitioner's request that the December 24, 2008 Petition be held in abeyance. A similar

1 acknowledgment letter was sent to Valley Alhambra in relation to its Partial Joinder. Copies of
2 both acknowledgement letters are collectively attached hereto as **Exhibit K**. The December 24,
3 2008 Petition has been designated SWRCB/OCC File No. A-1981.

4 On January 16, 2009, Regional Water Board staff met with Petitioner's representatives,
5 Valley Alhambra's representatives, and their environmental consultants at the Site. During this
6 January 16, 2009 on-site meeting, the Regional Water Board agreed with the Petitioner, Valley
7 Alhambra and their consultants that no additional investigation of the adjacent Mirror Image
8 property located at 4880 Valley Boulevard was required. However, the Regional Water Board
9 asserted, over the stakeholders objections, that the Site should be further delineated by additional
10 on-site soil vapor sampling and, further, that offsite contamination, if any, should be delineated
11 by obtaining two samples from soil borings located in Valley Boulevard. .

12 Although Petitioner and Valley Alhambra maintain that the additional scope of work
13 directed by the Regional Water Board during the January 16, 2009 on-site meeting is
14 unnecessary, in a good faith effort to obtain site closure and notwithstanding those objections, on
15 June 1, 2010, ARCADIS submitted a Work Plan Addendum for Additional Soil Gas and
16 Groundwater Site Closure Sampling ("Work Plan Addendum") to the Regional Water Board on
17 behalf of Leggett & Platt and Valley Alhambra. The Work Plan Addendum, a copy of which is
18 attached hereto as **Exhibit L**, was prepared and submitted to the Regional Water Board. In
19 response thereto, on August 5, 2010 the Regional Water Board issued the conditional approval
20 letter that is the subject of this Petition.

21 At Petitioners' request, on June 9, 2010, the State Water Board sent Petitioner
22 acknowledgment letters confirming an extension of the period during which the July 10, 2008
23 Petition and December 24, 2008 Petition will be held in abeyance to July 10, 2012, and December
24 24, 2012, respectively, in order to allow the stakeholders to continue in their efforts to work
25 cooperatively with the Regional Water Board to obtain site closure. Copies of both
26 acknowledgement letters are collectively attached hereto as **Exhibit M**.

27 A more detailed recitation of the facts underlying the assessment and remediation of the
28 Site are set forth in the July 10, 2008 Petition, July 10, 2008 Linkletter Declaration, December 24,

1 2008 Petition, December 22, 2008 Linkletter Declaration, and Valley Alhambra's Partial
2 Joinders, which are attached hereto as **Exhibits B, C, D, H, I and J**. Leggett further reserves the
3 right to submit supplemental declarations from ARCADIS at the completion of its work on the
4 pending investigation. For the purpose of brevity, the factual and legal contentions contained in
5 said documents are not repeated herein verbatim. However, the factual and legal contentions
6 contained in those documents also form the basis of the instant Petition and are incorporated
7 herein by reference. Additionally, Petitioner reserves the right to supplement this Petition with a
8 further statement of reasons if the Petition is reactivated.

9
10 **III. NAME AND ADDRESS OF THE PETITIONER**

11 All correspondence and other written communications regarding this matter should be
12 addressed to representatives of both Petitioner Leggett & Platt and the Site's owner Valley
13 Alhambra, as follows:

14 Mr. Robert Anderson
15 Leggett & Platt, Incorporated
16 P.O. Box 757
17 Number 1 Leggett Road
18 Carthage, MO 64836

19 Gary J. Herman, Sr.
20 1201 S. Olive Street
21 Los Angeles, California 90015
22 Telephone: 213-747-6531, Ext. 114
23 Facsimile: 213-747-4305
24 garysr@sdherman.com

25 With copies to:

26 Joan C. Donnellan, Esq., Counsel for Leggett & Platt
27 Gary Meyer, Esq.
28 Pedram Mazgani, Esq.
Parker, Milliken, Clark, O'Hara & Samuelian
A Professional Corporation
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Telephone: (213) 683-6500
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JDonnellan@pmcos.com
GMeyer@pmcos.com
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Linda Northrup, Counsel for Valley Alhambra

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Northrup Schlueter
31365 Oak Crest Drive, Suite 250
Westlake Village, CA 91361

Telephone: 818-707-2600
Facsimile: 818-707-2675
lnorthrup@nspc.com

IV. SPECIFIC ACTION OF THE REGIONAL WATER BOARD THAT PETITIONER REQUESTS THE STATE WATER BOARD REVIEW

Petitioner requests review of the August 5, 2010 Order issued by the Regional Water Board to Petitioner Leggett & Platt. The Order requires the submittal of technical reports, additional soil vapor sampling, the preparation of a human health risk assessment and semi-annual groundwater sampling, as specified in the August 5, 2010 Order, pursuant to Water Code Section 13267. A copy of the August 5, 2010 Order is attached hereto as **Exhibit A**.

V. DATE OF THE REGIONAL WATER BOARD ACTION

The Order is dated August 5, 2010.

VI. STATEMENT OF REASONS WHY THE REGIONAL WATER BOARD'S ACTION WAS INAPPROPRIATE OR IMPROPER

This Petition presents factual and legal issues that also form the basis of SWRCB/OCC File Nos. A-1936 and A-1981, which currently are being held in abeyance. Petitioner incorporates herein Sections V and VIII of its July 10, 2008 Petition, relevant portions of the July 10, 2008 Linkletter Declaration, Sections VI and IX of its December 24, 2008 Petition, and relevant portions of the December 22, 2008 Linkletter Declaration, which are attached hereto as **Exhibits B, C, H and I**, respectively. Petitioner requests that the State Water Board hold this Petition in abeyance for the maximum time period permitted or until reactivated by Petitioner. If the need arises, Petitioner will seek to reactivate both this Petition and the two prior petitions, and request a single hearing on all three matters. Petitioner reserves its right to supplement this Petition with a further statement of reasons if the Petition is reactivated.

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VII. MANNER IN WHICH THE PETITIONER IS AGGRIEVED

Petitioner is aggrieved by the August 5, 2010 Order because: (1) closure should have been issued with restrictive covenants when requested by Valley Alhambra in January 2007; (2) the August 5, 2010 Order was wrongfully issued to Leggett & Platt without any determination that Leggett & Platt is a PRP as to the Site; and (3) the August 5, 2010 Order imposes an excessive and unnecessary financial burden on Valley Alhambra and/or Leggett & Platt.

VIII. THE SPECIFIC ACTION THAT PETITIONER REQUESTS THE STATE BOARD TAKE

Petitioner requests that the June 11, 2008 Order, the November 25, 2008 Order, and August 5, 2010 Order be rescinded in their entirety on the grounds that they are beyond the scope of the investigation necessary to characterize the Site for closure. The State Water Board should direct the Regional Water Board to issue a closure letter for the Site.

Alternatively, Leggett & Platt requests that the June 11, 2008 Order, the November 25, 2008 Order, and August 5, 2010 Order be amended to remove Leggett & Platt as the recipient of the Orders and/or to strike any reference to Leggett & Platt as a PRP for the Site.

Petitioner requests that the State Water Board hold this Petition in abeyance for the maximum time period permitted or until reactivated by Petitioner. Petitioner reserves the right to request further action authorized by Water Code Section 13320 if the Petition is reactivated.

IX. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL ISSUES RAISED IN THIS PETITION

Petitioner incorporates herein Section VIII of its July 10, 2008 Petition, relevant portions of the July 10, 2008 Linkletter Declaration, IX of its December 24, 2008 Petition, and relevant portions of the December 22, 2008 Linkletter Declaration, which are attached hereto as **Exhibits B, C, H and I**, respectively.

In addition to the substantive legal arguments incorporated by reference from the prior

1 Petition further identifies the following objections to the August 5, 2010 Order:

2 1. The reports requested by No. 1 and 4 of the August 5, 2010 Order cannot
3 be provided until the all the soil gas samples have been collected as set forth in No. 2.
4 The technical data obtained from the ENVIRON December 2008/January 2009
5 investigation, which was submitted by email to David Young of the Regional Water
6 Board on January 15, 2010, is insufficient to prepare the technical report requested in No.
7 1 or to prepare the HHRA requested in No. 4 since by virtue of the August 5, 2010 Order
8 additional soil gas samples are required to delineate the Site.

9 2. The cost of preparing reports with incomplete data is prohibitive and
10 outweighs any perceived benefit derived from the reports.

11 3. The resumption of groundwater testing and subsequent semi-annual
12 reporting set forth in No. 5 will require the installation of new groundwater wells as the
13 Regional Water Board authorized the abandonment of the wells in 2004. The Board
14 admits as much in No. 2 of the Order.

15 4. Leggett & Platt Incorporated has never owned, leased or operated the Site
16 and has exhausted the settlement funds which it administered for the investigation and
17 remediation of the Site. It is not a proper party to the Regional Water Board Orders
18 commencing in June of 2008. (See Billheimer Declaration) The Regional Water Board
19 has presented no evidence to the contrary. The Petitioner reserves the right to supplement
20 this Petition or present additional evidence to rebut any and all evidence presented by the
21 Regional Water Board intended to establish that Leggett & Platt, Incorporated is a
22 responsible party within the meaning of Water Code Section 13267 .

23
24 **X. STATEMENT OF SERVICE OF PETITION TO THE REGIONAL WATER**
25 **BOARD**

26 A copy of this Petition has been sent to the Regional Water Board.
27
28

1 **XI. STATEMENT THAT THE SUBSTANTIVE ISSUES RAISED IN THE PETITION**
2 **HAVE BEEN RAISED BEFORE THE REGIONAL WATER BOARD**

3 Petitioner and Valley Alhambra are engaged in an ongoing dialogue with the Regional
4 Water Board relating to the investigation of soil and groundwater at and about the Site, including
5 the August 5, 2010 Order. Thus, Petitioner requests that this Petition be held in abeyance
6 pursuant to Title 23 of the California Code of Regulations, Section 2050.5(d), pending further
7 good faith discussions between Petitioner, Valley Alhambra and the Regional Water Board.
8

9 **XII. REQUEST TO THE REGIONAL BOARD FOR PREPARATION OF THE**
10 **RECORD**

11 Petitioner is requesting that the Regional Water Board prepare the record, including
12 available tape recordings and transcripts, for the hearing on this Petition. A copy of Petitioner's
13 request to the Regional Water Board for preparation of the record is attached hereto as **Exhibit N**.
14 In light of the ongoing dialogue with the Regional Water Board, as well as Petitioner's request
15 that this Petition be held in abeyance to allow further consideration of these matters by the
16 Regional Water Board, Petitioner reserves the right to request that the Regional Water Board
17 supplement the Regional Water Board record prepared pursuant to the attached request with
18 additional and further information and documents submitted to or generated by the Regional
19 Water Board following the preparation of the record by the Regional Water Board as requested by
20 **Exhibit N** hereto. Moreover, pursuant to Water Code Section 13320(b) and Title 23 of the
21 California Code of Regulations section 2050.6(a), Petitioner requests that the State Water Board
22 supplement the record before it. Petitioner will advise the State Water Board more specifically in
23 this regard once the Regional Water Board has prepared the record and Petitioner knows what
24 matters have not been included.
25

26 **XIII. REQUEST FOR EVIDENTIARY HEARING**

27 In accordance with Title 23 of the California Code of Regulations section 2050.6(b) and
28 2052(c), Petitioner respectfully requests that the State Water Board hold a hearing to consider this

1 Petition. At the hearing, Petitioner may present additional evidence that was not available to the
2 Regional Water Board at the time the Order was issued or when this Petition is submitted,
3 including, but not limited to, supplemental declarations from ARCADIS prepared after the
4 completion of its work on the pending investigation. In addition, Petitioner requests permission
5 at any hearing: (1) to present oral argument on the legal and policy issues raised by this Petition;
6 and (2) to present to the State Water Board factual and technical information in the Regional
7 Water Board's files which may have been overlooked by the Regional Water Board. Given that
8 this Petition presents factual and legal issues that also form the basis of SWRCB/OCC File Nos.
9 A-1936 and A-1981, which currently are being held in abeyance, Petitioner requests a single
10 hearing on all three matters if reactivated.

11 12 **XIV. REQUEST FOR STAY**

13 In accordance with Title 23 of the California Code of Regulations section 2053(a),
14 Petitioner requests a stay of the August 5, 2010 Order. Compliance with the August 5, 2010
15 Order will cause substantial harm to the Petitioner, including the cost of compliance with the
16 Order, which will be excessive as set forth the Linkletter Declaration filed in December of 2008
17 and attached as Exhibit I to this Petition. Moreover, in order to comply with the timelines
18 established by the August 5, 2010 Order, the bulk of these costs will be incurred by Petitioner
19 prior to a hearing on the Petition by the State Water Board unless a stay is granted.¹

20 By contrast, there will be no substantial harm to the public interest or other interested
21 parties if a stay is granted because investigation, remediation, and confirmation monitoring, as
22 well as a prior risk assessment, confirm that the current conditions at the Site do not pose a
23 significant risk to human health or the environment. Indeed, the Regional Water Board has
24 previously indicated that the Site was ready for closure.

25 Finally, there exist substantial questions of fact and law regarding the propriety of the
26 August 5, 2010 Order, including, *inter alia*, Leggett & Platt's contention that the Regional Water

27
28 ¹ Alternatively, Petitioner may be placed in the position of having to incur substantial fines or penalties for failing to comply with the Regional Water Board order pending a hearing on their Petition.

1 Board is without authority to issue a Section 13267 Order against Leggett & Platt and Petitioner's
2 contention that the cost of compliance with the August 5, 2010 Order does not bear a reasonable
3 relationship to the need for the additional scope of work and the benefits to be obtained
4 therefrom.

5 Based upon these reasons, as well as the other contentions set forth in this Petition,
6 Petitioner requests a stay of the August 5, 2010 Order pursuant to Title 23 of the California Code
7 of Regulations section 2053(a). Petitioner requests a hearing on its request for stay to present
8 further relevant evidence and arguments, including, but not limited to, supplemental declarations
9 from ARCADIS prepared after the completion of its work on the pending investigation. Petitioner
10 also incorporates herein Section VIII of its July 10, 2008 Petition, relevant portions of the July 10,
11 2008 Linkletter Declaration, IX of its December 24, 2008 Petition, and relevant portions of the
12 December 22, 2008 Linkletter Declaration, which are attached hereto as **Exhibits B, C, H and I**,
13 respectively.

14

15 **XV. REQUEST THAT PETITION BE HELD IN ABEYANCE**

16 Petitioner requests that the State Water Board hold this Petition in abeyance pursuant to
17 Title 23 of the California Code of Regulations, Section 2050(d) or 2050.5(d), pending further
18 good faith discussions between Petitioner, Valley Alhambra and the Regional Water Board. In
19 this regard, Petitioner notes that the State Water Board has previously granted Petitioner's
20 requests to hold the related Petitions (SWRCB/OCC File Nos. A-1936 and A-1981) in abeyance
21 based upon the same facts and circumstances. Petitioner requests that the State Water Board hold
22 this Petition in abeyance for the maximum time period permitted or until reactivated by
23 Petitioner. Petitioner will promptly notice the State Water Board when it is ready to reactivate
24 and have its Petition considered. Petitioner reserves the right to supplement this Petition if the
25 State Water Board does not grant Petitioner's request for abeyance or should the Petition be
26 reactivated in the future.

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28 **XVI. CONCLUSION**

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For the foregoing reasons, Petitioner respectfully submits that the issuance of the August 5, 2010 Order was improper, inappropriate, unlawful, and not supported by substantial evidence. Petitioner respectfully requests that the State Water Board grant this Petition and review the Regional Water Board's action in issuing the August 5, 2010 Order. However, until such time that Petitioner requests the State Water Board to reactivate this Petition, Petitioner requests that the State Water Board hold this Petition in abeyance.

DATED: September 2, 2010

PARKER, MILLIKEN, CLARK, O'HARA &
SAMUELIAN
A Professional Corporation

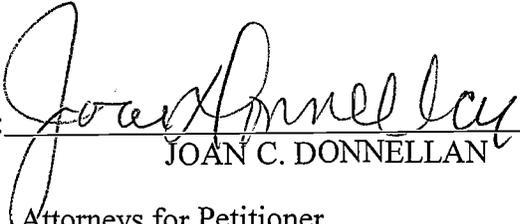
By: 
JOAN C. DONNELLAN
Attorneys for Petitioner
Leggett & Platt, Incorporated

EXHIBIT A



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

August 5, 2010

Mr. Robert Anderson
Staff Vice President Environmental Affairs
Leggett and Platt, Inc.
One Leggett Road
Carthage, MO 64836

CONDITIONAL APPROVAL OF WORK PLAN ADDENDUM FOR ADDITIONAL INVESTIGATION OF GROUNDWATER AND SOIL GAS PURSUANT TO CALIFORNIA WATER CODE 13267 ORDER - VALLEY ALHAMBRA PROPERTY, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA (SCP NO. 0967, SITE ID 204DJ00)

Dear Mr. Anderson:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties. To accomplish this, the Regional Board issues investigative orders authorized by Porter Cologne Water Quality Control Act (California Water Code [CWC], Division 7). The Regional Board issued a CWC section 13267 Order to you dated November 25, 2008 (Order), conditionally approving a work plan for additional investigation of impacted soil gas and groundwater at the subject site (Site) and requiring submittal of technical documents following completion of the approved work. The approved field work was completed in December 2008. On January 16, 2009, Regional Board staff conducted an inspection at the Site and held a meeting with the former consultant for the project and legal representatives from Parker, Milliken, Clark, O'Hara & Samuelian, and Northrup Schlueter, to discuss the preliminary results from the completed investigation work. During this inspection/meeting Regional Board staff concurred that an addendum to the original work plan dated November 14, 2008, could be prepared for additional investigation and delineation of impacted soil gas and groundwater. The purpose in submitting an addendum to the original work plan was to allow additional investigation to continue in a timely manner so the results could be combined with the December 2008 investigation data.

Regional Board staff has received and reviewed the document titled *Work Plan Addendum for Additional Soil Gas and Groundwater Site Closure Sampling* (Addendum), dated June 1, 2010, prepared by your consultant Arcadis. The Addendum proposes collection of two additional grab groundwater samples on Valley Boulevard located northwest (downgradient) of the former dip tank and underground storage tanks at the Site; three additional soil gas samples will be collected from the area where the highest concentrations of chlorinated volatile organic compounds were detected during the previous investigation; all on-Site groundwater monitoring wells will be sampled; and, a human health risk assessment (HHRA) will be prepared and submitted to the Regional Board.

Based on our review of the Addendum and other file documents, we approve the Addendum, provided the following requirements are met:

California Environmental Protection Agency

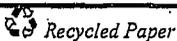


Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

August 5, 2010

1. Regional Board staff has not received a technical report following the previous phase of investigation completed at the Site in December 2008. This technical report was due to the Regional Board on March 31, 2009, and is considered delinquent, as indicated in the Notice of Violation (NOV) issued to you on May 27, 2009 (enclosed). The Addendum includes figures that reference data from the December 2008 investigation, however, we have not received laboratory reports to verify the referenced values. Therefore, you are required to provide a technical report documenting the results of the work completed during the December 2008 investigation (including laboratory reports, field data sheets, geophysical logs and/or data, etc.). This report is past-due and must be submitted to the Regional Board immediately to minimize the penalties that may be assessed.
2. Based on the December 2008 soil gas data referenced in the Addendum, Regional Board staff has determined that the soil gas plume has not been delineated. Additional soil vapor sampling locations are needed beyond what is proposed in the Addendum to determine the lateral extent of soil gas contamination. Although the plume appears to migrate off-Site beneath the railroad property to the southeast and the adjacent property to the west, thus limiting access for off-Site investigation during this phase of assessment, additional soil gas samples must be collected from on-Site in the areas of monitoring wells MW-4 and MW-5 and within the building in the areas of SG-101, SG-104, and SG-105. The sampling methodology and laboratory analysis for additional soil gas samples should be consistent with the work proposed in the Addendum.
3. Following the completion of the field work and laboratory analyses proposed in the Addendum, a report presenting the results of the additional soil gas and groundwater sampling shall be submitted to the Regional Board by **November 8, 2010**. If it is determined that the soil gas plume has not been defined based on the results of the proposed investigation and required additional soil gas sampling indicated in comment 2 (above), or if contamination is detected in groundwater samples above the California drinking water Maximum Contaminant Levels in the proposed off-Site sampling locations, you are required to submit a work plan for additional soil gas investigation and/or additional investigation and installation of groundwater monitoring wells until the extent of the soil gas and/or groundwater plumes are determined. This work plan (if necessary) shall be submitted to the Regional Board for review and approval by **November 8, 2010**.
4. According to the Addendum, an HHRA will be prepared and submitted to the Regional Board. Because the Regional Board does not have a toxicologist on staff, we will request the assistance of the Office of Environmental Health Hazard Assessment (OEHHA) in reviewing the HHRA to ensure protection of human health at the Site. Please provide all input data (including data obtained from the December 2008 soil gas investigation) and calculations for screening and/or modeling purposes in this report so that Regional Board and OEHHA staff can validate the risk calculations. Please provide us with two hard copies of the HHRA. One of these copies will be forwarded to OEHHA for review. The following document can be referenced for completion of a site-specific vapor intrusion evaluation/HHRA: "Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air", dated December 15, 2004 (revised February 7, 2005), or the latest version, prepared by the Department of Toxic Substances Control.

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.

Mr. Robert Anderson
Leggett & Platt
SCP No. 0967

- 3 -

August 5, 2010

The HHRA is past-due and must be submitted to the Regional Board immediately to minimize the penalties that may be assessed.

5. As directed in the Order, you were required to resume monitoring of all new and existing groundwater wells at the Site according to the following semi-annual schedule:

<u>Report Period</u>	<u>Report Due Date</u>
January – June	July 31 st
July – December	January 31 st

The required semi-annual groundwater monitoring reports for the second half of 2008, all of 2009, and the first half of 2010, are considered delinquent as indicated in the NOV dated May 27, 2009. All future semi-annual groundwater monitoring events must comply with the schedule specified in the Order to avoid additional violations and potential civil liabilities.

6. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.

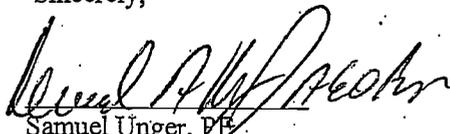
The requirement to submit the above mentioned technical report and work plan is an amendment to the existing CWC section 13267 Order issued by the Regional Board on November 25, 2008. Pursuant to section 13268 of the CWC, failure to submit the required technical reports by the specified due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1000) for each day the technical reports are not received.

All future technical reports required pursuant to CWC section 13267 Orders shall contain the following completed perjury statement (below). The perjury statement shall be signed by you or someone acting on your behalf as a senior authorized representative (and not by a consultant). It shall be in the following format:

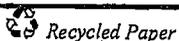
"I [Name], do hereby declare, under penalty of perjury under the laws of the State of California, that I am [Job Title] for [Name of Responsible Party/Discharger], that I am authorized to attest to the veracity of the information contained in the reports described herein, and that the information contained in [Name and Date of Report] is true and correct, and that this declaration was executed at [Place], [State], on [Date]."

If you have any questions, please feel free to contact Mr. David Young at (213) 576-6733, or via email at dyoung@waterboards.ca.gov.

Sincerely,


Samuel Unger, PE
Interim Executive Officer

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.

Mr. Robert Anderson
Leggett & Platt
SCP No. 0967

- 4 -

August 5, 2010

Enclosure: Regional Board Notice of Violation dated May 27, 2009

cc: Mr. Gordon Billheimer, Leggett & Platt
Ms. Linda Northrup, Northrup Schlueter
Mr. Gary Herman, S.D. Herman Co.
Mr. Gary Meyer, Parker, Milliken, Clark, O'Hara & Samuelian
Ms. Joan Donnellan, Parker, Milliken, Clark, O'Hara & Samuelian
Mr. Robert Ruscitto, Arcadis

California Environmental Protection Agency

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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

May 27, 2009

Mr. Robert Anderson
Leggett and Platt, Inc.
One Leggett Road
Carthage, MO 64836

Certified Mail
Return Receipt Requested
Claim No. 7008 0150 0003 7881 1128

NOTICE OF VIOLATION – FAILURE TO SUBMIT TECHNICAL REPORTS PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER – VALLEY ALHAMBRA PROPERTY, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA (SCP NO. 0967, SITE ID 204DJ00)

Dear Mr. Anderson:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with the primary responsibility for the protection of ground and surface water quality within major portions of Los Angeles and Ventura Counties, including the referenced site.

On November 25, 2008, the Regional Board Executive Officer issued you the enclosed California Water Code (CWC) section 13267 Order (Order) directing you to submit the following technical reports:

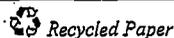
1. A Semi-annual (July through December 2008) groundwater monitoring report due by January 31, 2009;
2. A vapor intrusion evaluation using site specific physical and chemical data due by March 31, 2009;
3. A site conceptual model (SCM) due by March 31, 2009; and,
4. An assessment report presenting the results of soil gas and groundwater/lithologic investigation due by March 31, 2009.

To date, the Regional Board has not received any of the referenced technical reports for the site.

You are hereby notified that you have violated California Water Code section 13267 by failing to submit the above technical reports according to the schedule specified in the Order dated November 25, 2008.

The Regional Board is aware that your attorney has petitioned the Order with the State Water Resources Control Board Office of Chief Counsel (OCC) and that the OCC is – at your attorney's request – holding the matter in abeyance for 2 years from the date of the petition (December 23, 2008). However, you are required to comply with the directives and specified due dates issued in the Order.

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Mr. Robert Anderson
Valley Alhambra Property

- 2 -

May 27, 2009

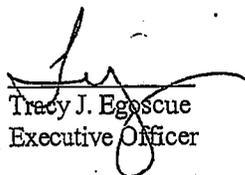
Section 13267 of the CWC provides the Regional Board the authority to require, under penalty of perjury, all needed technical and monitoring program reports for investigating the quality of any waters of the State.

Pursuant to section 13268 of the CWC, you are now subject to the imposition of civil liability penalties by the Regional Board in an amount up to one thousand dollars (\$1,000) for each day that you are out of compliance with the Order. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning. Please submit the required documents as soon as possible to minimize the penalties that may be assessed.

The Regional Board may also request that the United States Attorney, appropriate county District Attorney, or City Attorney seek criminal prosecution. A superior court may be requested to impose civil or criminal penalties.

If you have any questions, please feel free to contact Mr. David Young at (213) 576-6733, or via email at dyoung@waterboards.ca.gov.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosure: Regional Board CWC 13267 Order dated November 25, 2008

Cc: Mr. Gordon Billheimer, Leggett & Platt
Ms. Linda Northrup, Northrup Schlueter
Mr. Gary Herman, S.D. Herman Co.
Mr. Gary Meyer, Parker, Milliken, Clark, O'Hara & Samuelian
Ms. Joan Donnellan, Parker, Milliken, Clark, O'Hara & Samuelian
Dr. George Linkletter, Environ
Mr. Eddie Arslanian, Environ
Ms. Seema Sutarwala, Environ

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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

November 25, 2008

Mr. Robert Anderson
Leggett and Platt, Inc.
One Leggett Road
Carthage, MO 64836

CONDITIONAL APPROVAL OF WORK PLAN FOR ADDITIONAL INVESTIGATION PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER - VALLEY ALHAMBRA PROPERTY, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA (SLIC NO. 0967, SITE ID 204DJ00)

Dear Mr. Anderson:

Los Angeles Regional Water Quality Control Board (Regional Board) staff has received and reviewed the document titled *Work Plan for Additional Investigations* (Work Plan), dated November 14, 2008; prepared by Environ International Corporation (Environ). The Work Plan was prepared in response to the Regional Board's June 11, 2008, California Water Code (CWC) section 13267 order (Order) (enclosed), directing you to submit a conceptual site model, a work plan for additional soil gas and groundwater investigation on and offsite, and a vapor intrusion evaluation. In addition, the Order directed you to resume groundwater monitoring on a semi-annual basis.

The Work Plan proposes advancing 10 borings on site to collect soil vapor samples from approximately 5 feet below ground surface (bgs). These proposed sampling locations are in the vicinity of the former dip tank and former underground storage tanks. Environ indicates that the soil gas analytical data will be compared with the commercial/industrial California Human Health Screening Levels (CHHSLs) and, if necessary, a vapor intrusion evaluation will be prepared. In addition, the Work Plan proposes collection of grab groundwater samples via hydropunch from five off-site locations to determine if groundwater impacted by releases of volatile organic compounds (VOCs) has migrated beneath the adjacent property.

Based on our review of the Work Plan and other file documents, we approve the Work Plan, provided the following conditions are met:

1. To assess residual VOCs in soil vapor at or near the former source areas, additional soil vapor sampling locations are needed beyond what is proposed in the Work Plan. Specifically, you are required to collect a soil vapor sample at 5 feet bgs in the area of the previous soil sampling location identified as SB6 (adjacent to former paint dip tank). Furthermore, one additional soil vapor sample must be collected at 5 feet bgs in close proximity to the previous soil vapor sampling location identified as SG-7 (adjacent to the former methylene chloride dip tank). The sampling methodology and laboratory analysis for these additional borings/samples should be consistent with the Work Plan.

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2. The Work Plan proposes drilling five off-site borings to approximately 3 feet beyond first encountered groundwater, which has historically ranged between 10 to 14 feet below ground surface. As directed in the Order, you are required to conduct an investigation of the physical properties of the saturated zone (including laboratory sieve analysis of soil matrix samples) and collection of discrete vertical groundwater samples. Investigation of the saturated zone must include continuous coring until a competent clay boundary with a minimum thickness of 5 feet is encountered. Multi-depth and discrete groundwater samples must be collected from water bearing zones or at a minimum of every 10 feet if the lithology appears consistent over a large depth interval.
3. If any soil vapor data from the proposed investigation have concentrations of contamination above the commercial/industrial CHHSLs, you are required to submit a vapor intrusion human health risk evaluation to the Regional Board using site specific physical and chemical data. Considering the delayed field work, the due date for submittal of the vapor intrusion evaluation is extended from December 19, 2008 (required in the Order) to **March 31, 2009**. This report may be included with the assessment report (see below) following completion of the field sampling and laboratory analysis. The Regional Board does not have a toxicologist on staff and will request the assistance of the California Office of Environmental Health Hazard Assessment (OEHHA) in reviewing the vapor intrusion evaluation to ensure protection of human health at the site. Please provide all input data and calculations for screening and/or modeling purposes in this report so that Regional Board and OEHHA staff can validate the risk calculations. The following document can be referenced for completion of a site-specific vapor intrusion evaluation: "Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air", dated December 15, 2004 (revised February 7, 2005), prepared by the California Department of Toxic Substances Control.
4. As directed in the Order, you were required to submit a site conceptual model (SCM) concurrently with the Work Plan. Because the Work Plan does not include a SCM, you are required to prepare, using existing and new data, and include the SCM in the assessment report following additional site investigation due by **March 31, 2009**. The goals of the SCM are to identify how the distribution of contaminants in soil, soil vapor, and groundwater have changed in space and time; potential current and future receptors; and, environmental issues that need to be addressed.
5. As directed in the Order, you are required to resume monitoring of the existing groundwater wells at the site according to the semi-annual schedule and requirements specified in the Order, with the July through December 2008 groundwater monitoring report due to the Regional Board no later than **January 31, 2009**.
6. The Work Plan indicates that Environ will update its previous site specific Health and Safety Plan (HASP) for the proposed field work. Please submit a copy of the updated HASP for our records at least 10 days prior to the start of field work. This HASP must be onsite during any work to be completed in accordance with the Work Plan. Furthermore, a health and safety briefing should be conducted with all site personnel on a daily basis, prior to commencing fieldwork.

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Mr. Robert Anderson
Leggett & Platt

- 3 -

November 25, 2008.

7. Please notify the Regional Board at least 10 working days prior to the start of fieldwork.
8. Following the completion of the field work and laboratory analysis, an assessment report presenting the results of soil gas and groundwater/lithologic investigation, a SCM, and a vapor intrusion evaluation, if necessary, shall be submitted to the Regional Board no later than March 31, 2009.
9. As indicated in the Order, based on the results of the hydropunch groundwater sampling, additional investigation and multi-depth monitoring wells on and offsite may be required until the vertical and lateral extent of the groundwater contamination originating from the site are fully defined.

Pursuant to section 13267 of the CWC, you are required to submit an assessment report including all required information, and groundwater monitoring reports according to the schedule specified above. Please provide us with two hard copies of the assessment report. One copy will be forwarded to the OEHHA for review, if necessary.

Pursuant to section 13268 of the CWC, failure to submit the required technical reports by the specified due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1000) for each day the technical reports are not received.

Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

If you have any questions, please feel free to contact Mr. David Young at (213) 576-6733, or via email at dyoung@waterboards.ca.gov.

Sincerely,

David A. Bachmann, AEO
Tracy J. Egoscue
Executive Officer

Enclosure: Regional Board Order dated June 11, 2008

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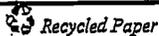
Mr. Robert Anderson
Leggett & Platt

- 4 -

November 25, 2008

cc; Mr. Gordon Billheimer, Leggett & Platt
Ms. Linda Northrup, Northrup Schlueter
Mr. Gary Herman, S.D. Herman Co.
Mr. Gary Meyer, Parker, Milliken, Clark, O'Hara & Samuelian
Ms. Joan Donnellan, Parker, Milliken, Clark, O'Hara & Samuelian
Dr. George Linkletter, Environ
Mr. Eddie Arslanian, Environ
Ms. Seema Sutarwala, Environ

California Environmental Protection Agency



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EXHIBIT B

1 Joan C. Donnellan SBN 79462
2 Gary A. Meyer SBN 94144
3 Pedram F. Mazgani SBN 204808
4 PARKER, MILLIKEN, CLARK, O'HARA & SAMUELIAN
5 A Professional Corporation
6 555 S. Flower St., 30th Floor
7 Los Angeles, California 90071-2440
8 Telephone: (213) 683-6500
9 Facsimile: (213) 683-6669
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11 Attorneys for Petitioner
12 Leggett & Platt, Incorporated
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8 STATE OF CALIFORNIA
9 STATE WATER RESOURCES CONTROL BOARD
10

11 IN THE MATTER OF THE PETITION
12 OF LEGGETT & PLATT,
13 INCORPORATED, FOR REVIEW OF
14 WATER CODE SECTION 13267
15 ORDER DATED JUNE 11, 2008, BY
16 THE CALIFORNIA REGIONAL
17 WATER QUALITY CONTROL BOARD,
18 LOS ANGELES REGION,
19

Petition No.

PETITION FOR REVIEW PURSUANT TO
WATER CODE SECTION 13320 AND 23 C.C.R.
SECTION §2050 ET SEQ.
[Request To Be Held In Abeyance Under 23
C.C.R. §2050.5(d)]

DECLARATION OF GEORGE LINKLETTER IN
SUPPORT THEREOF

PARKER MILLIKEN
CLARK O'HARA &
SAMUELIAN, A
PROFESSIONAL
CORPORATION

330418 (4009 700)

PETITION FOR REVIEW

DOCS

1 **I. INTRODUCTION**

2 Pursuant to Water Code Section 13320 and Title 23 of the California Code of Regulations,
3 Section 2050 et seq., Petitioner Leggett & Platt, Incorporated, a Missouri corporation ("Leggett &
4 Platt") hereby petitions the State Water Resources Control Board ("State Water Board") for
5 review of a Water Code Section 13267 Order ("Order") issued on June 11, 2008 by the Executive
6 Officer of the California Regional Water Quality Control Board, Los Angeles Region ("Regional
7 Water Board"), which would require Petitioner to submit a work plan for additional investigation
8 of soil gas and ground water at and about 4900 Valley Boulevard, Los Angeles, California
9 ("Site").

10 The Site has been subject to years of prior assessment, remediation, and monitoring
11 activities subject to the oversight of the Regional Water Board. Indeed, the soil was extracted in
12 the area of identified contamination in 1993 and subsequently the identified area on the Site was
13 completely and successfully remediated with a gas vapor extraction process under the supervision
14 of the Regional Water Board. After the gas vapor extraction was completed, the Site was
15 monitored and sampled extensively as instructed by the Regional Water Board. In 2004, the
16 Regional Water Board authorized removal of the monitoring equipment and the cessation of any
17 further investigation or remediation activities at the Site. (See Linkletter Declaration)

18 The sole condition to close the Site was the Regional Water Board's request that Valley
19 Alhambra (the Site owner) sign a deed restriction. Yet when Valley Alhambra agreed to accept
20 the deed restriction in January 2007, the Regional Water Board failed to issue a closure; rather,
21 the Regional Water Board, with no new evidence and with no factual or legal basis, decided to
22 issue the Section 13267 Order, essentially re-opening the Site and requiring Petitioner to start the
23 investigation and remediation process all over again.

24 Complying with the Order will require Petitioner to reinstall equipment that the Regional
25 Water Board allowed to be shutdown and removed, and will require Petitioner to re-perform
26 characterization and investigation of the same Site including, without limitation, sampling,
27 analysis, reporting, and other work that has already been done and accepted by the Regional
28 Water Board. Yet the Regional Water Board has no new evidence or any evidence of any change

1 at the Site to justify re-doing what has already been done at a previously remediated Site. Thus,
2 pursuant to Water Code Section 13320, Petitioner requests that the State Water Board review the
3 Regional Water Board's Section 13267 Order, rescind the Order on the grounds that it is beyond
4 the scope of the investigation necessary to characterize the Site for closure, and direct the
5 Regional Water Board to grant closure of the Site without further unnecessary expenditure by
6 Petitioners.

7 Concurrently with the filing of this Petition, Petitioner will pursue reconsideration of the
8 Order by the Regional Water Board. Thus, Petitioner requests that the State Water Board hold
9 this Petition in abeyance pursuant to Title 23 of the California Code of Regulations, Section
10 2050.5(d), pending further good faith discussions between Petitioner and the Regional Water
11 Board.

12

13 **II. NAME AND ADDRESS OF THE PETITIONER**

14 Leggett & Platt has acted as the administrator of settlement funds used to fund the
15 remediation of the Site pursuant to a settlement agreement between Valley Alhambra and Leggett
16 & Platt and Dresher, Inc., its wholly owned subsidiary. The remediation process is documented in
17 reports filed with the Regional Water Board by Environ and referred to in George Linkletter's
18 Declaration. Notably, the settlement was a resolution of a disputed claim regarding
19 contamination at the Site after Leggett & Platt's subsidiary Dresher, Inc. vacated the Site in 1991.
20 The settlement was intended to terminate expensive protracted litigation in favor of remediating
21 the alleged contamination at the Site. Neither party admitted liability. There has been no finding
22 of liability against Leggett & Platt or Dresher, Inc. for contamination at the Site.

23 Valley Alhambra is the owner of the Site and the real party in interest. Nevertheless, the
24 Regional Water Board has issued the Order against Leggett & Platt, without naming Valley
25 Alhambra. In light of their respective interests in the outcome of the Petition, Leggett & Platt (as
26 administrator of the settlement fund) and Valley Alhambra (filing a partial joinder as the owner of
27 the Site and an interested party) are jointly concerned about the efficacy of the pending order.

28 Thus, all correspondence and other written communications regarding this matter should be

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addressed as follows:

Mr. Robert Anderson
Leggett & Platt, Incorporated
P.O. Box 757
Number 1 Leggett Road
Carthage, MO 64836

Gary J. Herman, Sr.
See Partial Joinder filed by Valley Alhambra

Los Angeles, California

With copies to:

Joan C. Donnellan, Esq., , Counsel for Leggett & Platt
Gary Meyer, Esq.
Pedram Mazgani, Esq.
Parker, Milliken, Clark, O'Hara & Samuelian
A Professional Corporation
555 S. Flower St., 30th Floor
Los Angeles, CA 90071-2440
Telephone: (213) 683-6500
Facsimile: (213) 683-6669
JDonnellan@pmcos.com
GMeyer@pmcos.com
PMazgani@pmcos.com

Linda Northrup, Counsel for Valley Alhambra
Northrup Schlueter
31365 Oak Crest Drive
Suite 250
WestlakeVillage, CA 91361

III. SPECIFIC ACTION OF THE REGIONAL WATER BOARD THAT PETITIONER REQUESTS THE STATE WATER BOARD REVIEW

Petitioner requests review of the Section 13267 Order issued by the Regional Water Board on June 11, 2008 to Petitioner Leggett & Platt. The Order requires the preparation of a work plan for additional investigation of soil gas and ground water at and about the Site pursuant to Water Code Section 13267. A copy of the Order is attached hereto as **Exhibit A**.

IV. DATE OF THE REGIONAL WATER BOARD ACTION

The Order is dated June 11, 2008.

1 **V. STATEMENT OF REASONS WHY THE REGIONAL WATER BOARD'S**
2 **ACTION WAS INAPPROPRIATE OR IMPROPER**

3 As explained more fully below, the issuance of the Order was beyond the authority of the
4 Regional Water Board and was inappropriate, improper and not supported by the record for the
5 following reasons:

- 6 • The Order contains findings of fact that are not supported by substantial evidence
7 in the record;
- 8 • Investigation, remediation, and confirmation monitoring activities, as well as the
9 data derived from these activities, evidence that current conditions of the soil and
10 ground water at the Site do not pose a substantial risk to human health or the
11 waters of the State;
- 12 • Given the extensive work performed at the Site over the last 10 years,
13 characterization of the Site is sufficient to understand the pre- and post-remedial
14 conditions at the Site;
- 15 • The burden, including costs of compliance, imposed on Petitioner by the Order
16 does not bear a reasonable relationship to the benefits that may be obtained from
17 the reports and investigations sought by the Order;
- 18 • Valley Alhambra should be included in the 13267 Order as the owner of the
19 property located at 4900 Valley Boulevard as Leggett & Platt's Dresher subsidiary
20 has not occupied the Site for almost 18 years and has no legal rights to use,
21 manage, control, alter, modify or dispose of the Site. Any inclusion of Leggett &
22 Platt in a 13267 Order should be specifically limited to its role as the administrator
23 of the settlement fund pending a determination of its status as a potentially
24 responsible party;
- 25 • Investigation, remediation, and confirmation monitoring to date justifies closure of
26 the Site without further investigation.

27 A more complete explanation of the statement of reasons why the Regional Water Board's Order
28 is inappropriate and improper is set for in Section VIII of this Petition, which is incorporated

1 herein.

2 Petitioner requests that the State Water Board hold this Petition in abeyance for the
3 maximum time period permitted or until reactivated by Petitioner. Petitioner reserves its right to
4 supplement this Petition with a further statement of reasons if the Petition is reactivated.
5

6 **VI. MANNER IN WHICH THE PETITIONER IS AGGRIEVED**

7 Petitioner is aggrieved by the Order because: (1) Closure should have been issued with
8 restrictive covenants when requested by Valley Alhambra in January 2007; (2) the Section 13267
9 Order was wrongfully issued solely to Leggett & Platt as the presumed responsible party without
10 including Valley Alhambra and before any determination that Leggett & Platt was a PRP as to the
11 Site; and (3) the Order imposes an excessive and unnecessary financial burden on Valley
12 Alhambra and on Leggett & Platt (as Fund administrator).
13

14 **VII. THE SPECIFIC ACTION THAT PETITIONER REQUESTS THE STATE BOARD**
15 **TAKE**

16 Petitioner requests that the Order be rescinded in its entirety on the grounds that it is
17 beyond the scope of the investigation necessary to characterize the Site for closure. The State
18 Water Board should direct the Regional Water Board to issue a closure letter for the Site.

19 Alternatively, Leggett & Platt requests that the Order be amended to include Valley
20 Alhambra, the owner of the Site (i.e. 4900 Valley Boulevard property), and to limit the Order's
21 application to Leggett & Platt to reflect Leggett & Platt's limited role as the administrator of the
22 settlement funds available to remediate the Site, reserving any order against Leggett & Platt until
23 the Regional Water Board establishes that Leggett & Platt is a responsible party with respect to
24 the scope of the current order or any subsequent order pertaining to Site investigation or
25 characterization.

26 Petitioner requests that the State Water Board hold this Petition in abeyance for the
27 maximum time period permitted or until reactivated by Petitioner. Petitioner reserves the right to
28 request further action authorized by Water Code Section 13320 if the Petition is reactivated.

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VIII. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF LEGAL ISSUES RAISED IN THIS PETITION

A. APPLICABLE STANDARD OF REVIEW

Any aggrieved person may petition the State Water Board to review an action or failure to act by a Regional Water Board within 30 days of such action or failure. Water Code §13320(a). Pursuant to Water Code section 13320(c), the State Water Board may find that the actions of a Regional Water Board were inappropriate or improper. Upon finding that the action of a Regional Water Board, or the failure of a Regional Water Board to act, was inappropriate or improper, the State Water Board may take the appropriate action, direct the Regional Water Board to take the appropriate action, and/or refer the issue to another state agency with jurisdiction. Water Code §13320(c). The State Water Board is vested with all the powers of the Regional Water Board for purposes of taking such actions. Water Code §13320(c).

Upon a Water Code Section 13320 Petition, the State Water Board must review the Regional Water Board record to determine if there is sufficient evidence ensuring an appropriate and proper action by the Regional Water Board. See Water Code §13320. The State Water Board is required to make an independent review of the Regional Water Board action to determine whether the weight of the evidence supports the issuance of the Regional Water Board's order. *In the Matter of the Petition of Exxon Company, U.S.A., et al. of the Adoption of the Cleanup and Abatement Order No. 85-066 by the California Regional Water Quality Control Board, Central Valley Region*, Order No. WQ 85-7, at p. 10 (standard of State Water Board review under Section 13320 requires independent judgment as to whether the action was reasonable).

In reviewing a decision of a Regional Water Board, the State Water Board is not subject to the same strict standards that govern court review of administrative actions. See Cal. Water Code § 13320; *In the Matter of the Petition of Exxon Company, supra*, Order No. WQ 85-7, at p. 10. Rather, the State Water Board must consider both the record before the Regional Water Board and "any other relevant evidence" when reviewing an order. Water Code §13320(b). Thus, the scope of review is "closer to that of independent review." *In the Matter of the Petition of Exxon*

1 *Company, supra*, Order No. WQ 85-7, at pp. 10, 12.

2 To uphold the Regional Water Board's challenged action as appropriate and proper, the
3 State Water Board must conclude that the action was "based on substantial evidence." *See Cal.*
4 *Water Code § 13320; In the Matter of the Petition of Exxon Company, supra*, Order No. WQ 85-
5 7, at pp. 10, 12.

6
7 **B. THE REGIONAL WATER BOARD HAS IMPROPERLY ISSUED THE**
8 **WATER CODE 13267 ORDER TO ONLY LEGGETT & PLATT**
9 **WITHOUT SUBSTANTIAL EVIDENCE IN THE RECORD THAT**
10 **LEGGETT & PLATT HAS DISCHARGED OR IS THREATENING TO**
11 **DISCHARGE WASTE AFFECTING WATER QUALITY; THE ORDER**
12 **SHOULD BE AMENDED TO REFLECT LEGGETT & PLATT'S ROLE AS**
13 **THE ADMINISTRATOR OF SETTLEMENT FUNDS**

14 In relevant part, Water Code Section 13267(b)(1) authorizes a Regional Water Board to
15 "require that any person who has discharged, discharges, or is suspected of having discharged or
16 discharging, or who proposes to discharge waste within its region ... shall furnish, under penalty
17 of perjury, technical or monitoring program reports which the regional board requires." The
18 Regional Board has not established that Leggett & Platt has discharged waste at the Site which
19 would be the subject of the current Order and, as such, the Regional Water Board has exceeded its
20 authority under Water Code Section 13267 by issuing its Order against Leggett & Platt.

21 The State Water Board has recognized that it is important for orders to explain the basis
22 for naming persons under Sections 13267 and 13304. *See e.g., In the Matter of the Petition of Mr.*
23 *Kelly Engineer/All Star Gasoline. Inc.*, Order No. WQO - 2002-0001, at pp. 4-5 (holding that
24 because Administrative Civil Liability Order did not contain requisite findings to justify
25 individual's responsibility under Section 13267 the matter must be remanded to regional board to
26 "separately name each responsible party, and include the justification for each named party."); *see*
27 *also, In the Matter of the Petition of Exxon Company, supra*, Order No. WQ 85-7, at p. 10-11
28 ("[T]here must be a reasonable basis on which to name each party. There must be substantial

1 evidence to support a filing of responsibility for each party named. This means credible and
2 reasonable evidence which indicates the named part has responsibility.”)

3 Further, while Section 13267 broadly authorizes the regional water boards to require
4 persons who “are suspected to have discharged” wastes to prepare technical reports, “[w]hen
5 acting under this broad authority, regional boards must identify the evidence that supports
6 requiring that person to provide the reports.” *In Re Petition for Review of Technical Report*
7 *Order/Chevron Products Co*, Order No. WQO 2004-0005, at p. 4. Moreover, if later
8 investigations do not support the regional water board’s initial “suspicions” then that person can
9 no longer be required to prepare further technical reports under Section 13267. *Id.* at pp. 6-8
10 (holding that regional board appropriately ordered Chevron to conduct an investigation during the
11 initial phases of the investigation but evidence gathered during the earlier investigations does not
12 support continuing requirements imposed on Chevron); *see also, Petition of Larry and Pamela*
13 *Canchola for Review of Water Code Section 13267 re MTBE*, Order No. 2003-0020, at p. 3, 7-8
14 (holding that regional board cannot require petitioners to further investigate MTBE pollution at
15 UST site because there is substantial evidence in the existing record that petitioners are not
16 responsible for MTBE pollution).

17 Contract Metal Fabricators (a.k.a. Harris Hubb), the predecessors of the current Dresher,
18 Inc. conducted assembly operations at the Site and leased the Site from Harold Roach, the
19 predecessor of Valley Alhambra, to “assemble” and “paint” bed frames. Evidence produced in
20 connection with the litigation settled in 2000 demonstrated that bed frames were delivered,
21 assembled and painted at the Site from about 1973 to 1990. A subsidiary of Leggett & Platt
22 acquired the stock of the former Dresher, Inc. on June 19, 1990, and the subsidiary took the name
23 of Dresher, Inc., which is the current Dresher entity. The current Dresher, Inc. was not a party to
24 the lease of 4900 Valley Boulevard (Site) nor did it operate the facility at that Site. Shortly after
25 the June 19, 1990 stock acquisition, the current Dresher, Inc. shut down and transferred the plant
26 operations to a different facility in Whittier, California, ultimately ceasing all activity at the Site
27 in early 1991 and vacating the Site thereafter. Leggett & Platt has no ownership rights to the Site
28 and no legal right to manage or operate the Site.

1 Leggett & Platt has agreed to manage a fund to remediate the Site pursuant to a settlement
2 agreement with Valley Alhambra executed in September of 2000. The settlement agreement
3 stipulated that neither Leggett & Platt nor Valley Alhambra admitted liability. To date, Leggett &
4 Platt's dealings with the Regional Water Board in relation to the Site have been in its capacity as
5 administrator of the settlement fund. Consequently, the Regional Water Board has exceeded its
6 statutory authority by issuing a Section 13267 Order to Leggett & Platt as a responsible party
7 because the Regional Water Board failed to identify substantial evidence in support of its decision
8 to issue the Section 13267 Order to Leggett & Platt as a potentially responsible party. Thus, the
9 State Water Board should amend the Order to clarify that Leggett & Platt is being named in the
10 Order in its capacity as administrator of the settlement fund. Further, Leggett & Platt reserves the
11 right to dispute the Regional Water Board's issuance of any future Order's directed to Leggett &
12 Platt in any capacity other than as administrator of the settlement fund.

13

14 **C. DATA FROM GROUND WATER SAMPLING REPORTS PREPARED BY**
15 **ENVIRON AND SUBMITTED TO THE REGIONAL WATER BOARD**
16 **SHOW THAT THE CURRENT CONDITION OF THE SOIL AND**
17 **GROUND WATER DOES NOT POSE A SUBSTANTIAL RISK TO THE**
18 **WATERS OF THE STATE OR THE GENERAL ENVIRONMENT AND IS**
19 **COMPLIANT WITH THE CURRENT CONDITIONS FOR SITE**
20 **CLOSURE**

21 The Site has been subject to years of prior assessment, remediation, and monitoring
22 activities under the oversight of the Regional Water Board. As detailed more fully in the
23 Regional Water Board record, these activities have included soil and ground water investigation,
24 successful remediation including soil extraction in 1993 and utilizing a gas vapor extraction
25 process, confirmation monitoring and sampling, and a risk assessment for the Site as recounted in
26 George Linkletter's Declaration. Indeed, following these activities, the Regional Water Board
27 authorized removal of the monitoring equipment and the cessation of any further environmental
28 related activities at the Site. As a result of the investigation, remediation, and confirmation

1 monitoring Environ has concluded that the current soil and ground water conditions at the Site do
2 not pose a substantial risk to human health or the environment based upon, *inter alia*, the
3 following factors:

- 4 • The Site is located atop shallow alluvial deposits, which lie above a non-waterbearing
5 formation. Further, borings and wells installed at the Site confirm that the water-bearing
6 strata at the Site is locally non-contiguous and that there is relatively little water present.
7 In light of these data, contamination detected in shallow ground water beneath the Site
8 does not pose a threat to aquifers that may be present down valley to the west of the Site
- 9 • There are no public supply or privately owned wells within a one-mile radius of the Site.
- 10 • Ground water testing between 2001 and 2003 demonstrated that PCE levels in the ground
11 water beneath the Site were reduced by orders of magnitude (e.g., from a peak of 4,800
12 µg/l to 26 ug/l at MW2, which is located immediately adjacent to the source area at the
13 Site) as a result of Regional Water Board approved remediation at the Site.
- 14 • Investigations relating to historic operations at the Site are inconclusive regarding the
15 cause of the PCE contamination at the Site but clearly defined the source area. Given the
16 results of the assessment, investigation, and remediation history of the Site it appears that
17 source contamination at the Site has been sufficiently remediated and remaining materials
18 do not pose a substantial risk to human health or the environment.
- 19 • Data collected from monitoring wells and soil borings along the western property line of
20 the Site (as well as other data points located downgradient from the source area), when
21 compared to substantially higher contamination levels in the source area on the Site and
22 within the context of the hydrostratigraphy at the Site, indicate only limited migration of
23 contaminants away from the source area.
- 24 • The radius of influence of the remediation system that operated at the Site, which include
25 an extraction well immediately adjacent to the Site's western property line, indicate that
26 the remedial process also addressed adjacent contamination which may have migrated to
27 the downgradient property.
- 28 • The analytical results from the deepest samples were judged reflective of ground water

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conditions and demonstrated only low or nondetectable concentrations of contaminants along the western Site boundary prior to the startup of the remediation system.

- Environ prepared a "Risk Assessment of Potential Migration of VOCs to Indoor Air," dated November 28, 2005, which concluded that the "cumulative cancer risks are no higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water Board provide an NFA designation for "unrestricted use for the site." In its April 17, 2006 memorandum addressed to the Regional Water Board, OEHHA stated that it agreed with Environ's conclusions regarding the risk assessment.
- Remaining contamination at and beneath the Site should dissipate without further active remediation and there is no evidence to suggest that it will pose a significant risk to human health or the environment.

Based upon the above-listed factors, Petitioner maintains that soil and ground water conditions at the Site do not pose a substantial risk to human health or the environment, that there is no need for further investigation at or downgradient from the Site, and, further, that closure should be granted. Further, given the extensive work performed at the Site over the last 10 years, characterization of the Site is sufficient to understand the pre- and post-remedial conditions at the Site. The Regional Water Board has failed to present "substantial evidence" in support of the further investigation required by the Order.

D. THE REGIONAL WATER BOARD HAS NOT PROVIDED PRIMA FACIE EVIDENCE TO SHOW A CHANGE IN CONDITIONS SINCE IT ORDERED THE REMEDIATION EQUIPMENT REMOVED AND STATED THAT THE SITE WAS ELIGIBLE FOR CLOSURE, SUBJECT TO RESTRICTIVE COVENANTS

The Site has been subject to years of prior assessment, remediation, and monitoring activities. Indeed, the Site was completely and successfully remediated with a gas vapor extraction process, and after the gas vapor extraction was completed, the Site was monitored and sampled extensively as instructed by the Regional Water Board. As established by the following

1 timeline of events, the Regional Water Board authorized removal of the monitoring equipment
2 and the cessation of any further environmental related activities at the Site:

- 3 • On April 30, 2001, Environ submitted an "Interim Remedial Action Plan" (IRAP)
4 to address subsurface volatile organic compounds (VOCs) at the Site. The
5 Regional Water Board authorized the implementation of the work on June 8,
6 2001. The remediation system, consisting of 2-PHASE soil vapor and ground
7 water extraction, began operating on December 6, 2001.
- 8 • Following an October 8, 2002 on-site meeting with representatives from Environ
9 (George Linkletter, Eddie Arslanian, and Bita Tabatabai) and the Regional Water
10 Board (David Young and J.T. Liu), it was mutually agreed to shut down the
11 remediation system in order to evaluate possible rebound in ground water. On
12 October 15, 2002, Environ submitted to the Regional Water Board a "Request for
13 Post-Remediation Monitoring" documenting the outcome of the October 8, 2002
14 meeting.
- 15 • Following the agreed upon number of post-remediation ground water monitoring
16 events, a meeting was held on November 18, 2003 between representatives from
17 Environ (George Linkletter, Bita Tabatabai, and Eddie Arslanian) and the
18 Regional Water Board (David Young and J.T. Liu) to discuss the data from the
19 post-remediation ground water monitoring and protocols for confirmation soil
20 sampling and a final round of ground water monitoring as a prelude to site closure
21 (No Further Action [NFA] designation).
- 22 • On December 3, 2003, Environ submitted its "Work Plan for Confirmation Soil
23 Sampling and Final Round of Groundwater Sampling." The work plan included
24 an historical summary of the soil, soil gas, and ground water data collected from
25 the Site. In a December 9, 2003 email, Mr. Young approved the work plan.
- 26 • In a January 16, 2004 email Environ submitted to the Regional Water Board the
27 results of the confirmation soil sampling and final round of ground water
28 sampling and requested an NFA designation for the Site.

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- In a February 11, 2004 email Environ followed up with Mr. Young on the status of the NFA.
- In a February 24, 2004 email Mr. Young requested a few items after talking to Regional Water Board "management" for the "closure process."
- In a March 25, 2004 email Environ submitted a case review form via electronic mail.
- Following various emails between Environ and Regional Water Board staff in a June 30, 2004 email Mr. Liu stated that Mr. Young had begun working on the NFA designation for the Site.
- In an August 10, 2004 email Environ once again submitted information to Mr. Young regarding the Site use history.
- Following various emails between Environ and Regional Water Board staff in an October 1, 2004 email Mr. Liu stated that the closure was discussed with Dr. Arthur Heath, Remediation Section Chief.
- In an October 6, 2004 telephone conversation with Mr. Liu, Environ informed the Regional Water Board that the Site is not located within the San Gabriel Valley Superfund Area. Also, Mr. Liu stated that a deed restriction would be placed as part of the NFA designation for the Site, restricting the use to non-sensitive receptors (i.e., excluding uses such as residential, schools, health care). In an October 6, 2004 email Environ confirmed its understanding of the results of the telephone discussion held earlier that day.
- To address the Regional Water Board's concern that a deed restriction would be required for unrestricted future use, and the implications of VOCs remaining in soil and ground water, Environ prepared a "Risk Assessment of Potential Migration of VOCs to Indoor Air," dated November 28, 2005. The risk assessment concluded that the "cumulative cancer risks are no higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water Board provide an NFA designation for "unrestricted use for the site."

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- The Regional Water Board submitted the risk assessment to the Office of Environmental Health Hazard Assessment (OEHHA) for review. In its April 17, 2006 memorandum addressed to the Regional Water Board OEHHA stated that it agreed with Environ's conclusions regarding the risk assessment, but raised certain questions for Regional Water Board consideration.
- On January 19, 2007, representatives from Environ (George Linkletter, CY Jeng, Eddie Arslanian), the Regional Water Board (Adnan Siddiqui and David Young), and representatives of the Site owner (Linda Northrup, counsel for the Site owners and Gary J. Herman, Sr.) and representatives of Leggett & Platt (Joan Donnellan, counsel for Leggett & Platt as administrator of the settlement fund) met to discuss the outstanding items raised in the OEHHA memo. Valley Alhambra waived its objections to executing restrictive covenants that run with the land as a condition of closure. The Regional Water Board agreed on an approach to address the various comments made by OEHHA. At the January 19, 2007 meeting Messrs. Siddiqui and Young indicated that they would discuss with Regional Water Board upper management whether there would be a need to conduct a post-remediation soil vapor study to confirm that there had been no change in the Site from the last ground water sampling as part of the closure process.

Throughout the above timeline of events Petitioner, Valley Alhambra and Environ were lead to understand, based upon the representations made by the Regional Water Board, that closure would be granted for the Site (either with or without a deed restriction). Nevertheless, when Environ (George Linkletter, Eddie Arslanian, Seema Sutarwala) and the Regional Water Board staff (Su Han and David Young) met on May 16, 2008, the Regional Water Board staff stated that additional work would be required prior to obtaining closure for the Site. Thereafter, on June 11, 2008, the Regional Water Board issued the Section 13267 Order. Regional Water Board staff, however, did not identify any new evidence or changed circumstances that would justify the Regional Water Board's apparent change in position.

1 As evidenced by the above timeline, the Regional Board had previously indicated that the
2 Site qualified for closure based on extensive ground water monitoring after a comprehensive
3 remediation had been completed in 2004. There have been no changes in the condition of the Site
4 or new or additional facts to support reopening the investigation. To the contrary, investigation,
5 assessment, and remediation activities conducted at the Site support closure at this time. The
6 Regional Water Board bears the burden of establishing by substantial evidence the need for
7 additional investigation after the Regional Water Board has previously authorized the removal of
8 the monitoring equipment and the cessation of any further environmental related activities at the
9 Site.

10
11 **E. THE COST ASSOCIATED WITH THE INVESTIGATION REQUIRED BY**
12 **THE ORDER HAS NO REASONABLE RELATIONSHIP TO THE**
13 **NOMINAL THREAT CAUSED BY THE RESIDUAL TRACES OF**
14 **CHEMICALS IN SOIL AND GROUND WATER AT THE SITE**

15 In relevant part, Water Code Section 13267(b)(1) provides that the “burden, including
16 costs, of these reports shall bear a reasonable relationship to the need for the report and the
17 benefits to be obtained from the reports.” Water Code Section 13267(b)(1) further provides that
18 in “requiring those reports, the regional board shall provide the person with a written explanation
19 with regard to the need for the reports, and shall identify the evidence that supports requiring that
20 person to provide the reports.”

21 While the statute may not require a formal “economic analysis,” it does place an
22 obligation on the Regional Water Board to come forward with *prima facie* evidence that the
23 burdens, including the costs, of the study are reasonable relative to the benefits. Where the benefit
24 is nominal or nonexistent, a disproportionately high cost will invalidate the request. *See, In the*
25 *Matter of the Petitions of the City of Pacific Grove*, Order No. WQ 82-8, at pp. 5-7, 14 (holding
26 that record contained ample evidence of the need for a study under Section 13267 but that “the
27 scope of the study is excessive resulting in unreasonably high costs” and, thus, should be
28 modified); *see also, In re the Matter of the Petition of Pacific Lumber Company and Scotia*

1 *Pacific Company LLC*, Order WQ 2001-14, at pp. 9-10 (“Information that is required to be
2 provided under Section 13267 is subject to the requirement that “[t]he burden, including costs of
3 these reports shall bear a reasonable relationship to the need for the reports and benefits to be
4 obtained from the reports.”).

5 In the present case, the Order requires an extensive work plan, investigation, technical
6 reports, and monitoring that will result in significant and unnecessary costs. The burden placed
7 on Petitioner, as the administrator of the settlement fund, and Valley Alhambra, as the owner of
8 the Site, by the Order far exceeds the benefit that the additional assessment required thereunder
9 would provide. The scope and breadth of the investigation that is required by the Order will
10 require substantial monetary expenditures, despite any substantial evidence that there is a pressing
11 need for this additional analysis. Moreover, the costs associated with complying with the Order
12 will be further compounded by logistical problems in obtaining access to an adjacent property
13 whose owner has been uncooperative to date. These costs have no reasonable relationship to the
14 need for the investigation sought by the Regional Water Board or the benefits that could be
15 gained from such an investigation.

16 At great expense, and with the approval of the Regional Water Board, Environ completely
17 and successfully remediated the Site with a gas vapor extraction process. After the gas vapor
18 extraction was completed to the Regional Water Board’s satisfaction, the Site was monitored and
19 sampled extensively as instructed by the Regional Water Board. Eventually satisfied with the
20 results of the monitoring, the Regional Water Board authorized removal of the monitoring
21 equipment and the cessation of any further environmental related activities at the Site. The sole
22 remaining issue was whether the Regional Water Board would require a deed restriction. Yet
23 when the Site owner (Valley Alhambra) agreed to accept the restrictive required by the Regional
24 Water Board as a condition of closure, in January 2007, the Regional Water Board failed to issue
25 a closure; rather the Regional Water Board, with no new evidence and with no factual or legal
26 basis, decided to issue the Order instead, essentially re-opening the Site and requiring Petitioners
27 to start the investigation and remediation process all over again.

28 Complying with the Order will require the reinstallation of equipment that the Regional

1 Water Board allowed to be shutdown and removed and will require the re-performance of
2 sampling, analysis, reporting, and other work that has already been done and accepted by the
3 Regional Water Board. Yet the Regional Water Board has no new evidence or any evidence of
4 any change at the Site to justify re-doing what has already been done at an already remediated
5 Site.

6 As set forth in the accompanying Declaration of George Linkletter, the cost of complying
7 with the Order is conservatively estimated to be in excess of \$250,000.00. In light of the
8 investigation, remediation, and confirmation monitoring conducted to date, the burden placed on
9 Petitioner by the Order (including the monetary cost of compliance) does not bear a reasonable
10 relationship to the need for the reports and the benefits to be obtained from the reports requested
11 by the Regional Water Board.

12
13 **F. FAILURE TO ISSUE CLOSURE CAN RESULT IN SERIOUS FINANCIAL**
14 **HARDSHIP TO VALLEY ALHAMBRA SINCE IT CANNOT SELL ITS**
15 **REAL ESTATE FOR A COMPETITIVE PRICE**

16 Petitioner incorporates herein by reference the Joinder filed by Valley Alhambra and the
17 supporting Declaration of Gary J. Herman, Sr.

18
19 **IX. STATEMENT OF SERVICE OF PETITION TO THE REGIONAL WATER**
20 **BOARD**

21 A copy of this Request has been sent to the Regional Water Board.

22
23 **X. STATEMENT THAT THE SUBSTANTIVE ISSUES RAISED IN THE PETITION**
24 **HAVE BEEN RAISED BEFORE THE REGIONAL WATER BOARD**

25 Concurrently with the filing of this Petition, Petitioner will pursue reconsideration of the
26 Order by the Regional Water Board. Thus, Petitioner requests that this Petition be held in
27 abeyance pursuant to Title 23 of the California Code of Regulations, Section 2050.5(d), pending
28 further good faith discussions between Petitioner and the Regional Water Board.

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XI. REQUEST TO THE REGIONAL BOARD FOR PREPARATION OF THE RECORD

Prior to filing this Petition, Petitioner and Valley Alhambra, acting through their respective legal counsel, as well as Environ, made repeated efforts to obtain access to the Regional Water Board file relating to the Site. Copies of multiple written requests to the Regional Water Board for access to the Regional Water Board file are collectively attached hereto as **Exhibit B**. Despite their best efforts, however, Petitioner, Valley Alhambra, and Environ were unable to review the file prior to the filing of this Petition. Thus, Petitioner reserves the right to supplement this Petition at a later date after being granted an opportunity to review the Regional Water Board file.

Additionally, in furtherance of this Petition, Petitioner is requesting that the Regional Water Board prepare the record, including available tape recordings and transcripts, for the hearing on this Petition. A copy of Petitioner's request to the Regional Water Board for preparation of the record is attached hereto as **Exhibit C**. In light of the ongoing dialogue between Petitioner and the Regional Water Board, as well as Petitioner's request that this Petition be held in abeyance to allow further consideration of these matters by the Regional Water Board, Petitioner reserves the right to request that the Regional Water Board supplement the Regional Water Board record prepared pursuant to the attached request with additional and further information and documents submitted to or generated by the Regional Water Board following the preparation of the record by the Regional Water Board as requested by **Exhibit C** hereto. Moreover, pursuant to Water Code Section 13320(b) and Title 23 of the California Code of Regulations section 2050.6(a), Petitioner requests that the State Water Board supplement the record before it. Petitioner will advise the State Water Board more specifically in this regard once the Regional Water Board has prepared the record and Petitioner knows what matters have not been included.

XII. REQUEST FOR EVIDENTIARY HEARING

PARKER MILLIKEN
CLARK O'HARA &
SAMUELIAN, A
PROFESSIONAL
CORPORATION

1 In accordance with Title 23 of the California Code of Regulations section 2050.6(b) and
2 2052(c), Petitioner respectfully requests that the State Water Board hold a hearing to consider this
3 Petition. At the hearing, Petitioner may present additional evidence that was not available to the
4 Regional Water Board at the time the Order was issued or when this Petition is submitted. In
5 addition, Petitioner requests permission at any hearing: (1) to present oral argument on the legal
6 and policy issues raised by this Petition; and (2) to present to the State Water Board factual and
7 technical information in the Regional Water Board's files which may have been overlooked by
8 the Regional Water Board.

9
10 **XIII. REQUEST FOR STAY**

11 In accordance with Title 23 of the California Code of Regulations section 2053(a),
12 Petitioner requests a stay of the Order. Compliance with the Order will cause substantial harm to
13 the Petitioner, including the cost of compliance with the Order, which will exceed \$250,000.00.
14 Moreover, in order to comply with the timelines established by the Order the bulk of these costs
15 will be incurred by Petitioner prior to a hearing on the Petition by the State Water Board unless a
16 stay is granted.¹

17 By contrast, there will be no substantial harm to the public interest or other interested
18 parties if a stay is granted because investigation, remediation, and confirmation monitoring, as
19 well as a prior risk assessment, confirm that the current conditions at the Site do not pose a
20 significant risk to human health or the environment. To the contrary, the Regional Water Board
21 has previously indicated that the Site was ready for closure.

22 Finally, there exist substantial questions of fact and law regarding the propriety of the
23 Regional Water Board's Order, including, *inter alia*, Leggett & Platt's contention that the
24 Regional Water Board is without authority to issue a Section 13267 Order against Leggett & Platt
25 except in Leggett & Platt's capacity as administrator of the settlement fund, and Petitioner's
26 contention that the cost of compliance with the Order does not bear a reasonable relationship to

27
28 ¹ Alternatively, Petitioner may be placed in the position of having to incur substantial fines or
penalties for failing to comply with the Regional Water Board Order pending a hearing on their
Petition.

1 the need for the reports and the benefits to be obtained from the reports requested by the Regional
2 Water Board.

3 Based upon these reasons, as well as the other contentions set forth in this Petition,
4 Petitioner requests a stay of the Order pursuant to Title 23 of the California Code of Regulations
5 section 2053(a). Petitioner has attached to this Petition the Declaration of Dr. George Linkletter
6 setting forth proof of the facts alleged in support of its request for stay and, further, requests a
7 hearing on its request for stay to present further relevant evidence and arguments.

8

9 **XIV. REQUEST THAT PETITION BE HELD IN ABEYANCE**

10 Petitioner requests that the State Water Board hold this Petition in abeyance pursuant to
11 Title 23 of the California Code of Regulations, Section 2050(d) or 2050.5(d), pending further
12 good faith discussions between Petitioner and the Regional Water Board. Petitioner requests that
13 the State Water Board hold this Petition in abeyance for the maximum time period permitted or
14 until reactivated by Petitioner. Petitioner will promptly notice the State Water Board when it is
15 ready to reactivate and have its Petition considered. Petitioner reserves the right to supplement
16 this Petition if the State Water Board does not grant Petitioner's request for abeyance or should
17 the Petition be reactivated in the future.

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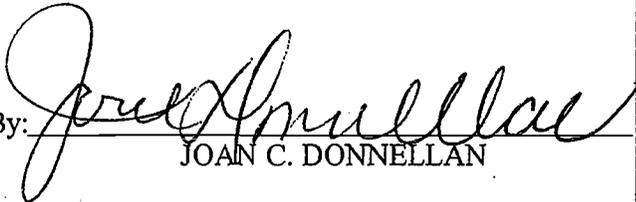
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XV. CONCLUSION

For the foregoing reasons, Petitioner respectfully submits that the issuance of the Order was improper, inappropriate, unlawful, and not supported by substantial evidence. Petitioner respectfully requests that the State Water Board grant this Petition and review the Regional Water Board's action in issuing the Order. However, until such time that Petitioner requests the State Water Board to reactivate this Petition, Petitioner requests that the State Water Board hold this Petition in abeyance.

DATED: July 10, 2008

PARKER, MILLIKEN, CLARK, O'HARA &
SAMUELIAN
A Professional Corporation

By: 
JOAN C. DONNELLAN

Attorneys for Petitioner
Leggett & Platt, Incorporated

Exhibit A



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

June 11, 2008

Mr. Robert Anderson
Leggett and Platt, Inc.
One Leggett Road
Carthage, MO 64836

CALIFORNIA WATER CODE (CWC) SECTION 13267 ORDER: REQUIRING SUBMITTAL OF A WORK PLAN FOR ADDITIONAL SOIL GAS AND GROUNDWATER INVESTIGATION - VALLEY ALHAMBRA PROPERTY, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA (SLIC NO. 0967, SITE ID 204DJ00)

Dear Mr. Anderson:

Los Angeles Regional Water Quality Control Board (Regional Board) staff has completed a review of the case file for the subject site. Based on the information provided to us, we have determined that the site is not eligible for closure of soil and/or groundwater at this time. The Regional Board is issuing this letter to require submittal of a work plan for additional investigation of soil gas and groundwater at the site.

Background

The site operated as a service station from at least 1920 until 1953 and subsequently was used by a variety of private companies. In 1953, three 500 gallon underground storage tanks (USTs) and three 1,000 gallon USTs were removed. In 1969, the Green Mountain Paper Company received a permit to install one 2,000 gallon UST. From January 1972 to January 1993, the site was occupied by Harris Hub/Contract Metal Fabricators/Dresher, Inc. In 1990, Leggett and Platt purchased the business and continued the operation. Activities at the site included painting and assembling metal bed frames. As part of the painting process, two dip tanks and three 750 gallon USTs were used to contain or store solvents. The three 750 gallon USTs were removed from the site in 1991, under the direction of the City of Los Angeles Fire Department (Fire Department). Several subsurface investigations were conducted at the site between 1991 and 1993 as required by the Fire Department for closure of the facility. These investigations are described in the report *Response to Request for Subsurface Site Assessment Work Plan* dated April 30, 2001.

In March 1999 and June 2001, additional soil investigations were completed at the site. Based on boring logs completed at the site during the installation of five groundwater monitoring wells in 1999, lithology in the upper 25 feet of soil consists of sands, clayey sands, and clays. The soil investigations indicated that volatile organic compounds (VOCs), including tetrachloroethene (PCE), trichloroethene (TCE), toluene, ethylbenzene, and xylenes were present beneath the footprints of the

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.

former dip tanks and USTs at approximately 8 to 10 feet below ground surface (bgs). Soil samples from beneath these tanks contained PCE at concentrations of up to 5,300 milligrams per kilogram (mg/kg), TCE at concentrations of up to 10 mg/kg, toluene at concentrations of up to 540 mg/kg, ethylbenzene at concentrations of up to 76 mg/kg, and xylenes at concentrations of up to 360 mg/kg. Soil samples also contained gasoline-range total petroleum hydrocarbons (TPH) at concentrations of up to 4,590 mg/kg. Analysis of soil samples for metals indicated concentrations consistent with background levels found in Southern California soils.

Soil-gas samples were collected in January 1999, at 15 locations from 5, 10, and 15 feet bgs, with the exception of two locations where the maximum achievable depth was 10 feet bgs. PCE was detected in soil gas in the upper 15 feet of soil at the site at concentrations up to 620 micrograms per liter ($\mu\text{g/L}$). TCE was only detected in two borings at much lower concentrations.

In May 1999, five groundwater monitoring wells (MW-1 through MW-5) were installed. These wells were first sampled in second quarter 1999 and showed moderate to high concentrations of VOCs. A quarterly groundwater monitoring program was initiated at the site in February 2001. The highest concentrations of VOCs in groundwater were detected during the second quarter sampling event completed in May 2001. During this sampling event, elevated concentrations of PCE were detected in wells MW-2 and MW-3 at 4,800 micrograms per liter ($\mu\text{g/L}$) and 4,100 $\mu\text{g/L}$, respectively. TCE and cis-1,2-DCE were also detected during this event, however at much lower concentrations. Groundwater was encountered during the installation of monitoring wells MW-1 through MW-5 between approximately 15 and 17 feet bgs.

Remediation of soil and groundwater began in December 2001, with the implementation of a dual-phase extraction system. The extraction system operated from December 2001 through October 2002 and removed approximately 107 pounds of VOCs from the site. After the remediation system was turned off, five additional quarters of groundwater sampling were performed to test for rebound and to verify residual contamination levels in groundwater. VOCs concentrations (PCE, TCE, and cis-1,2-DCE) in groundwater had decreased or remained generally stable after system shut down. Based on the latest groundwater sampling event in December 2003, VOCs remain in groundwater beneath the site with concentrations up to 26 $\mu\text{g/L}$ of PCE, 19 $\mu\text{g/L}$ of TCE, and 89 $\mu\text{g/L}$ of cis-1,2-DCE.

Confirmation soil matrix sampling was conducted at the site in December 2003 and January 2004 at locations adjacent to the former dip tanks and USTs. Analytical results indicated that PCE was found in six of the nine samples with a maximum concentration of 140 micrograms per kilogram ($\mu\text{g/kg}$) at 10 feet bgs (decreasing to 37 $\mu\text{g/kg}$ at 12 feet bgs). Other VOCs detected included toluene at up to 320 $\mu\text{g/kg}$, ethylbenzene up to 19 $\mu\text{g/kg}$, and xylenes up to 108 $\mu\text{g/kg}$. No other VOCs were detected above the laboratory reporting limits during this soil sampling event.

The consultant for the site, Environ International Corporation (Environ), prepared a *Risk Assessment of Potential Migration of Volatile Organic Compounds to Indoor Air* (Risk Assessment) dated November 28, 2005. The Office of Environmental Health Hazard Assessment (OEHHA) reviewed the Risk Assessment and provided comments to Regional Board staff in a memo dated April 17,

2006. OEHHA indicated that the lack of post-remediation soil-gas sampling could represent a limitation in the Risk Assessment as all modeling was based on soil matrix and groundwater data.

Comments and Requirements

After reviewing historic groundwater monitoring, dual-phase extraction, and confirmation sampling reports, as well as the Risk Assessment and other file documents, Regional Board staff has the following comments and requirements:

1. You are required to submit a conceptual site model (CSM), using existing and new data, to identify any data gaps for delineating the soil vapor plume and impacted groundwater on and offsite. This CSM is due to the Regional Board by **August 19, 2008**, and may be included with the required work plan(s) for additional investigation of soil-gas and groundwater (see below).
2. Additional groundwater data is needed to properly evaluate the lateral and vertical extent of groundwater contamination. Although groundwater data collected from the on-site monitoring wells indicate concentrations of chlorinated VOCs contamination in groundwater have been significantly reduced, the upgradient, cross-gradient, and downgradient extent of this contamination has not been defined to non-detect levels. Therefore, you are required to fully define the vertical and lateral extent of groundwater contamination originating from the site. However, prior to construction of additional groundwater monitoring wells you are required to conduct an investigation of the physical properties of the saturated zone (including laboratory sieve analysis of soil matrix samples) and collect discrete vertical groundwater samples. Investigation of the saturated zone must include continuous coring until a competent clay boundary with a minimum thickness of 5 feet is encountered. Discrete groundwater samples should be collected from water bearing zones or at a minimum of every 10 feet if the lithology appears consistent over a large depth interval. Based on this information, additional groundwater monitoring wells can be constructed to give the most useful data for evaluation of impact to groundwater beneath the site, which may require the installation of multi-depth nested or cluster wells on and offsite. You are required to submit a work plan to define the lateral and vertical extent of contamination in groundwater by **August 19, 2008**.
3. Based on comments received from OEHHA dated April 17, 2006 (copy attached), you are required to perform a post-remedial soil-gas investigation and complete a vapor intrusion evaluation for the site. The work plan for the soil-gas investigation may be included with the work plan for the lateral and vertical delineation of contaminated groundwater due to the Regional Board by **August 19, 2008**. The completed vapor intrusion evaluation is due to the Regional Board by **December 19, 2008**. The following document can be referenced for the site-specific vapor intrusion evaluation: "Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air", dated December 15, 2004 (revised February 7, 2005), prepared by the Department of Toxic Substances Control.

Mr. Robert Anderson
Valley Alhambra Property

- 4 -

June 11, 2008

4. Groundwater monitoring is not being conducted at the site. You must resume monitoring of the existing and new groundwater wells at the site according to the following semi-annual schedule:

<u>Report Period</u>	<u>Report Due Date</u>
January – June	July 31 st
July – December	January 31 st

In addition to the information provided in the previous monitoring reports, all future groundwater monitoring reports shall include the following:

- Isoconcentration map(s) for contaminants of concern in groundwater at the site.
- A table detailing the construction of all existing (and planned) groundwater monitoring wells at the site.
- Cross-section figures showing the extent of dissolved-phase contamination in the saturated zone along the groundwater flow direction and perpendicular to groundwater flow direction.

You are required to resume groundwater monitoring at the site with the July through December 2008 groundwater monitoring report due to the Regional Board no later than **January 31, 2009**.

5. A Health and Safety Plan for the required work must be submitted to the Regional Board prior to initiating any fieldwork. You may include the Health and Safety Plan in the required work plan(s) as an appendix.
- 6: Please note that effective July 1, 2005, all reports submitted to the Regional Board must comply with the electronic submittal of information (ESI) to be submitted over the internet, including, groundwater monitoring reports, soil and/or groundwater investigation/characterization reports, remedial action plans, requests for closure, and portable data format (PDF). The text of the regulations can be found at the URL:

http://www.waterboards.ca.gov/ust/cleanup/electronic_reporting/docs/final_electronic_regs_dec04.pdf

Additionally, the State Water Board Geotracker data management system is capable of accepting this electronic information. The Regional Board does not have the resources to acquire hardware to allow caseworkers to appropriately review documents in electronic form. Therefore, for the foreseeable future, we request that you continue to submit hard copies of all documents and data submittals, in addition to ESI to Geotracker.

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Mr. Robert Anderson
Valley Alhambra Property

- 5 -

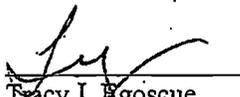
June 11, 2008

Pursuant to section 13267 of the CWC, you are required to submit a conceptual site model and a work plan for additional soil gas and groundwater investigation on and offsite by **August 19, 2008**, a vapor intrusion evaluation by **December 19, 2008**, and to resume groundwater monitoring and reporting according to the schedule specified in item 4 (above), with the first semi-annual groundwater monitoring report due by **January 31, 2009**. A Health and Safety Plan for the proposed work must be submitted to the Regional Board prior to initiating any fieldwork. You may include the Health and Safety Plan with the required work plan as an appendix.

Pursuant to section 13268 of the CWC, failure to submit the required technical reports by their due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1000) for each day the technical report or document is not received.

If you have any questions, please feel free to contact Mr. David Young at (213) 576-6733 or Ms. Su Han at (213) 576-6735.

Sincerely,


Tracy J. Egoscue
Executive Officer

Enclosure: Memorandum from OEHHA dated April 17, 2006

Cc: Ms. Jennifer Fordyce, Office of Chief Counsel
Ms. Linda Northrup, Northrup Schlueter
Mr. Gary Herman, S.D. Herman Co.
Ms. Joan Donnellan, Leland, Parachini, Steinberg, Matzger & Melnick, LLP
Dr. George Linkletter, Environ
Mr. Eddie Arslanian, Environ
Ms. Seema Sutarwala, Environ

California Environmental Protection Agency

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

4-7-06

Office of Environmental Health Hazard Assessment



Dan Skopac
Acting Agency Secretary

Joan E. Denton, Ph.D., Director
Headquarters • 1001 I Street • Sacramento, California 95814
Mailing Address: P.O. Box 4010 • Sacramento, California 95812-4010
Oakland Office • Mailing Address: 1515 Clay Street, 15th Floor • Oakland, California 94612



Arnold Schwarzenegger
Governor

MEMORANDUM

TO: David A. Young
Los Angeles Region IV
California Regional Water Quality Control Board
320 W. 4th Street, 1st Floor
Los Angeles, California 90013

FROM: Hristo Hristov, MD, Ph.D., M.Env.Sc.
Integrated Risk Assessment Branch
Office of Environmental Health Hazard Assessment
1001 I Street, 12th Floor
Sacramento, California 95814

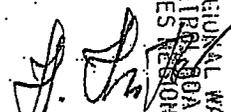
DATE: April 17, 2006

SUBJECT: RISK ASSESSMENT OF POTENTIAL MIGRATION OF VOLATILE ORGANIC COMPOUNDS TO INDOOR AIR, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA, AND RESPONSE TO OEHHA REVIEW OF "RISK ASSESSMENT OF POTENTIAL MIGRATION OF VOLATILE ORGANIC COMPOUNDS TO INDOOR AIR, 4900 VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA"

SWRCB #R4-05-10

OEHHA # 880118-01

RECEIVED
06 APR 20 PM 3:15
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LOS ANGELES REGION



Document Reviewed

(Italicized text is quoted from the report.)

The Integrated Risk Assessment Branch of the Office of Environmental Health hazard Assessment (OEHHA) reviewed the document entitled "*Risk Assessment Of Potential Migration Of Volatile Organic Compounds To Indoor Air, 4900 Valley Boulevard, Los Angeles, California*", prepared by Environ to provide comments or approval. In addition, a letter entitled "*Response to OEHHA review of Risk Assessment Of Potential Migration Of Volatile Organic Compounds To Indoor Air, 4900 Valley Boulevard, Los Angeles, California*" was received on March 29, 2006 and considered in the preparation of this memorandum. The letter was prepared to address some initial OEHHA's concerns intended to the attention of the Los Angeles Water Resource Quality Control Board (LA RWQCB) site manager.

California Environmental Protection Agency

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Scope of the Review

The documents were reviewed for scientific and regulatory issues related to the risk assessment process applied "to obtain an *"unrestricted use" condition for the Site from the California Regional Water Quality Control Board - Los Angeles....*" The review was intended to verify the obtained results, elaborate on their analysis, and evaluate the conclusions made by the consultant. Only typographical errors reflecting the scientific integrity and the text interpretation were noted.

Limitations

The Report Format and Content - This short report is limited to the development of risk-based concentrations (RBCs) developed to protect residents potentially occupying the site from inhalation of vapors migrating from contaminated soil and groundwater.

Site Characterization - No site characterization section was found in the provided report. Environ provided (through the LA RWQCB) a set of documents, namely "Fourth Quarter 2003 Ground Water Monitoring report and Confirmation Soil Sampling, 4900 East Valley Boulevard, Los Angeles, California", and "Workplan for Confirmation Soil Sampling and Final Round of Ground Water Sampling, 4900 East Valley Boulevard, Valley Alhambra Property, Los Angeles, California" as part of the Response to OEHHA review letter on March 29, 2006. However, OEHHA was not authorized to review these documents. An accurate estimate of risk from contamination at a site depends on chemical concentrations that reflected the contamination at the site. This requires samples of soil, soil-gas and water to be analyzed for toxic chemicals that are likely to be in the samples. Furthermore, the sample locations must represent the site as a whole or at least not avoid significant contamination. Finally, samples must be handled in such a way that chemical is not lost before the analysis can take place. Due to their proximity to and familiarity with sites, Regional Water Quality Control Board (RWQCB) staff can better determine the sampling locations, sample handling and needed for chemical analysis. Therefore, OEHHA based its analysis on the assumption that the sampling and analysis are comprehensive, representative, and accurate for this site and that all data used in the Risk Assessment are correct and representative of the data shown in the ground water monitoring and confirmation soil sampling report.

Type of Data Used - All modeling is based on soil matrix and groundwater data. CalEPA and US EPA recommend the use of soil-gas data to decrease the uncertainty related to contaminant partitioning among the three soil matrix phases. According to the Environ "Response to OEHHA review of "Risk Assessment of Potential Migration..." letter sent on

March 29, 2006 "no soil-gas sampling was performed following the remediation because of the low concentrations remaining in soil and ground water." This could represent a limitation in the assessment.

Site Background

No Site Background Information was found within the provided risk assessment report and within the documents sent on March 29, 2006.

General Comments

Completeness of the Risk Assessment – The LA RWQCB requested OEHHA to review the risk estimation under residential and construction scenarios, soil ingestion and contact pathways, and migration of vapors originating from soil and ground water. Some initial comments provided by OEHHA to the LA RWQCB resulted in Environ's "Response to OEHHA review of "Risk Assessment of Potential Migration..." letter sent on March 29, 2006 to OEHHA. A Site Conceptual Model (SCM) figure attached to this letter shows a number of complete exposure pathways, including soil ingestion and dermal contact with soil. However, according to the text (response 1) all pathways except vapor migration indoors have been eliminated as incomplete without further explanation. The elimination of potentially relevant pathways should be discussed in the report. OEHHA agrees that risk estimation under residential scenario provides more conservative risk estimates than typical risk estimation under industrial or commercial scenarios. However, this does not apply to the construction worker scenario. Without further explanation, OEHHA cannot support the elimination of pathways under the residential and construction scenarios.

Groundwater Contamination Of Concern – According to the SCM, "ground water at the site is not in a water supply aquifer and too deep for dermal contact". The following table compares the maximum groundwater concentrations to current drinking water Public Health Goals.

Chemical	Maximum Groundwater Concentration ($\mu\text{g/L}$)	Public Health Goal ($\mu\text{g/L}$)
Tetrachloroethylene (PCE)*	26	0.06
Trichloroethylene (TCE)*	19	0.8
cis-1,2-Dichloroethylene	89	100

* carcinogen

Based on Table 5 showing parameters used in the vapor migration modeling, it appears that the ground water is located 13 feet below ground surface (ft bgs). The location of the closest drinking water wells is not shown in the report. OEHHA is not in a position to assess the appropriateness of the Environ's conclusion that ground water does not need to be protected as a drinking water source.

Evaluation of Ecological Impact – no discussion of the potential of ecological impact was found in the report.

Soil and Ground Water Vapor Migration to Indoor Air

The following issues were identified in the provided documents:

1. According to p. 3 of the report tetrachloroethylene (PCE) was identified at two separate depth strata from approximately 2 to 7 feet below ground surface (bgs) and from 10 to 13 ft bgs. All PCE modeling and risk calculations are based on this depth contamination assumption. The soil interval between 7.3 and 10 ft bgs was not sampled. Environ should have assumed that the PCE contamination starts at 7.3 and extends to 13 ft bgs to avoid modeling underestimation of the risk and hazard.

2. Although the report's Table 5 shows the parameters used in the vapor intrusion modeling (from soil and ground water), modeling spreadsheets were not provided within the report. Later, Environ provided example spreadsheets for PCE in soil and refined PCE modeling for one of the three groups of groundwater wells only, as part of its "Response to OEHHA comments..." letter. Thus I was unable to verify the modeling calculations.

- Two soil strata, namely A and B are shown in the soil modeling section in Table 5. This subdivision is unnecessary and confusing because both strata are sand extending to the groundwater table, and the Johnson & Ettinger model allows assigning strata for the depth interval above the top of contamination not below the top of contamination. However, the spreadsheet provided later shows that the modeling was performed correctly. Accordingly, this comment refers to the presentation in Table 5 only.
- Table 5 shows three groups of groundwater well locations differing by the different type of soil, respectively soil properties, soil thickness, and contaminant concentrations. The provided spreadsheet shows an example of refined groundwater PCE modeling at one of the groups only. This way it was impossible to understand whether the modeling results are representative of the locations showing the highest vapor migration, and respectively risk and hazard.

David A. Young
April, 17, 2006
Page 5

3. The report does not show the cumulative hazard resulting from inhalation of vapors originating in soil and ground water.

4. Table 6 of the report show some RBC calculation errors which were corrected in the revised Table 6 attached to the letter (except for ethylbenzene which RBC should be $2.32 \text{ E}+02 \mu\text{g}/\text{kg}$).

Based on the above, OEHHA independently remodeled the RBCs and estimated the cumulative risk and hazard. While the total incremental lifetime cancer risk resulted in the low 10^{-5} range, the total hazard index resulted about 0.2 which is even below the recommended acceptable one of 1.0. The obtained RBC and risk values resulted to be close to the ones generated by the consultant.

Conclusions

My review of the presented Risk Assessment Of Potential Migration Of Volatile Organic Compounds To Indoor Air confirmed the consultant conclusions.

The following issues are presented for your consideration:

1. The assessment was limited to the indoor air pathway for residents. It did not evaluate all complete pathways under residential and construction worker scenarios.
2. The potential ecological impact was not discussed.
3. Groundwater was not considered a source or potential source of drinking water. No supportive arguments were found in the provided documents.
4. The methods and parameters for evaluating the vapor migration pathway were not clear in the original report. Although, this was eventually clarified by Environ's subsequent letter and my own recalculation, this letter is not part of the report. An amendment to the report may help in this regard.
5. Additivity was not considered for non-carcinogens, although my calculations demonstrated acceptable total hazard index.
6. The acceptability of the calculated total cancer risk is a risk management decision and the possibility of use restriction or mitigation should be determined by the LA RWQCB.

Please do not hesitate to contact me at (916) 322-8364 or by e-mail at, hristov@oehha.ca.gov, if you have any questions related to this review.

Reviewed by:

Jim C. Carlisle, D.V.M., M.Sc., Senior Toxicologist

Exhibit B

PARKER MILLIKEN

PARKER, MILLIKEN, CLARK, O'HARA, SAMUELIAN
A PROFESSIONAL CORPORATION

JOAN C. DONNELLAN

Direct Dial: (213) 683-6638
E-mail: JDONNELLAN@PMCOS.COM

June 27, 2008

Via Hand Delivery & Facsimile

Fax No. (213) 576-6640

David Young

California Regional Water Quality Control Board

320 West Fourth Street, Suite 200

Los Angeles, California 90013

Re: 4900 Valley Alhambra Blvd Site, (SLIC No 0967, Site ID 204DJ00)

Dear Mr. Young:

Leggett & Platt Incorporated hereby requests that the file containing all documentation relied on by the Board in the above referenced matter be made available for inspection and copying no later than July 2, 2008 to assist both Valley Alhambra and Leggett & Platt Incorporated to evaluate the filing of a Petition for Reconsideration of the order issued in the June 11th 2008 letter pursuant to California Water Code Section 13267 and a Petition for Review and Abeyance with the State Water Board under California Water Code Section 13320.

Because State Water Board Counsel has advised us that the petitions must be filed by July 11, 2008, we request an expedited response to avoid further prejudice to our client.

Leggett & Platt Incorporated makes this request exclusively in its role as administrator of the cap fund established by the settlement agreement between Valley Alhambra and Leggett & Platt Incorporated and does not admit liability for the condition of the above referenced site.

Please contact Eddie Arslanian at Environ to arrange the date for inspection and copying.

Very Truly Yours,



Joan C. Donnellan
PARKER, MILLIKEN, CLARK,
O'HARA & SAMUELIAN

4009-700 (329848)

ATTORNEYS AT LAW
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June 27, 2008

Via U.S. Mail & Facsimile

(213) 576-6640

Mr. David Young

California Regional Water Quality Control Board

320 West Fourth Street, Suite 200

Los Angeles, California 90013

Re: 4900 Valley Alhambra Blvd. Site, (SLIC No 0967, Site ID 204DJ00)

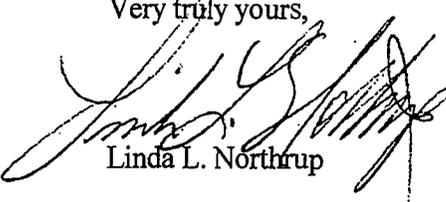
Dear Mr. Young:

My firm represents Valley Alhambra Properties, the owner of the above referenced property. We are in receipt of a recent order issued by the State Water Board with reference to this property. On behalf of our client, we hereby request that the file containing all documentation relied on and generated by the Board in the above referenced matter be made available for inspection and copying no later than July 2, 2008 to assist us and our consultants in evaluating the recent order in the context of the entire site history and to evaluate and, if necessary, file a Petition for Reconsideration of the order issued in the June 11, 2008 letter pursuant to California Water Code Section 13267 and a Petition for Review and Abeyance with the State Water Board under California Water Code Section 13320.

Because State Water Board Counsel has advised us that any such petitions must be filed by July 11, 2008, we request an expedited response to this request to avoid prejudice to our client in this matter.

Please contact Eddie Arslanian at Environ as soon as possible to arrange a date for inspection and copying. Should you have any questions or need further information to process this request, please do not hesitate to contact me.

Very truly yours,



Linda L. Northrup

LLN/

Mr. David Young
June 27, 2008
Page 2

cc: Joan C. Donnellan, Esq. (by U.S. Mail)
Mr. Gary J. Herman, Sr. (by U.S. Mail)
Mr. Eddie Arslanian (by U.S. Mail)
Mr. George Linkletter (by U.S. Mail)
Ms. Sue Hahn (by U.S. Mail and Facsimile)

FACSIMILE COVER LETTER

Date: July 7, 2008
To: UST File Review **From:** Eddie Arslanian
Company: LARWQCB **Company:** ENVIRON
Fax No.: 213-576-6707 **Fax No.:** (213) 943-6301
Project No.:
Total # of Pages: 1 (including cover page)

Message:

In anticipation of a filing of a "Petition for Reconsideration" by this Friday, July 11, ENVIRON requests to review files this week for the Valley Alhambra Property, 4900 Valley Boulevard, Los Angeles, California (Underground Storage Tank ID No. 900320052). The site also has a SLIC listing (SLIC No. 0967) and we have made a separate request for that file under the SLIC program. Please coordinate with Mr. David Young, the case officer under the SLIC listing, to expedite this process.

Please call me at 213-943-6326 to set up an appointment. Thank you.

copy: Mr. David Young, Los Angeles Regional Water Quality Control Board
Ms. Su Han, Los Angeles Regional Water Quality Control Board

ENVIRON

FACSIMILE COVER LETTER

Date: July 7, 2008
To: SLIC File Review Request **From:** Eddie Arslanian
Company: LARWQCB **Company:** ENVIRON
Fax No.: 213-576-6717 **Fax No.:** (213) 943-6301
Project No.: SLIC No. 0967
Total # of Pages: 1 (including cover page)

Message:

In anticipation of a filing of a "Petition for Reconsideration" by this Friday, July 11, ENVIRON requests to review files this week for the Valley Alhambra Property, 4900 Valley Boulevard, Los Angeles, California (SLIC No. 0967). Please coordinate with Mr. David Young, the case officer, to expedite this process.

Please call me at 213-943-6326 to set up an appointment. Thank you.

copy: Mr. David Young, Los Angeles Regional Water Quality Control Board
Ms. Su Han, Los Angeles Regional Water Quality Control Board

Exhibit C

PARKER MILLIKEN

PARKER, MILLIKEN, CLARK, O'HARA, SAMUELIAN
A PROFESSIONAL CORPORATION

PEDRAM MAZGANI

Direct Dial: (213) 683-6686
E-mail: PMAZGANI@PMCOS.COM

July 10, 2008

Via U.S. Mail & Facsimile [(213) 576-6640]

Attn: David Young
California Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: 4900 Valley Alhambra Blvd Site, (SLIC No 0967, Site ID 204DJ00)

Dear Mr. Young:

On July 10, 2008, Leggett & Platt Incorporated filed a Petition with the State Water Resources Control Board pursuant to Water Code Section 13320 for review of the California Regional Water Quality Control Board, Los Angeles Region's Section 13267 Order issued to Leggett & Platt Incorporated on June 11, 2008. Pursuant to Title 23 of the California Code of Regulations, Section 2050.5(a) you are requested to file the administrative record, including available tape recordings and transcripts, if any, with the State Water Resources Control Board within thirty (30) days.

Please contact me if you have any questions.

Very Truly Yours,



Pedram Mazgani
PARKER, MILLIKEN, CLARK,
O'HARA & SAMUELIAN

cc: Ms. Linda Northrup (via facsimile)
Mr. Gordon Billehimer (via facsimile)
Mr. Eddie Arslanian (via facsimile)
Mr. George Linkletter (via facsimile)
Ms. Sue Hahn (via hand delivery)

4009-700 (330435)

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(213) 683-6500 • FAX (213) 683-6669
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EXHIBIT C

1 Joan C. Donnellan SBN 79462
2 Gary A. Meyer SBN 94144
3 Pedram F. Mazgani SBN 204808
4 PARKER, MILLIKEN, CLARK, O'HARA & SAMUELIAN
5 A Professional Corporation
6 555 S. Flower St., 30th Floor
7 Los Angeles, California 90071-2440
8 Telephone: (213) 683-6500
9 Facsimile: (213) 683-6669
10
11 Attorneys for Petitioner
12 Leggett & Platt, Incorporated



8 STATE OF CALIFORNIA

9 STATE WATER RESOURCES CONTROL BOARD

11 IN THE MATTER OF THE PETITION
12 OF LEGGETT & PLATT,
13 INCORPORATED, FOR REVIEW OF
14 WATER CODE SECTION 13267
15 ORDER DATED JUNE 11, 2008, BY
16 THE CALIFORNIA REGIONAL
17 WATER QUALITY CONTROL BOARD,
18 LOS ANGELES REGION,

Petition No. _____

DECLARATION OF GEORGE LINKLETTER IN
SUPPORT OF PETITION FOR REVIEW
PURSUANT TO WATER CODE SECTION
13320 AND 23 C.C.R. SECTION §2050 ET SEQ.
[Request To Be Held In Abeyance Under 23
C.C.R. §2050.5(d)] and STAY OF ORDER

17 I, GEORGE O. LINKLETTER, declare as follows:

18 1. I declare under penalty of perjury that I am a Principal and Senior Vice President
19 of ENVIRON and have served as the Principal-in-Charge of investigation, evaluation and
20 remediating the PCE/TCE contamination at 4900 East Valley Boulevard, Los Angeles California
21 ("Site").

22 2. I have both A.B. and A.M. degrees in Geology from Dartmouth College, and a
23 Ph.D. in Geology from the University of Washington. I am a Professional Geologist in the State
24 of California with over 35 years of experience, including extensive experience in investigating
25 suspected contamination, characterizing contaminated sites and developing and successfully
26 implementing remedial programs. A copy of my curriculum vitae is attached hereto as Exhibit A.

27 3. My experience extends to all types of industrial contaminants in soil and ground
28 water, including PCE/TCE, in both rural and urban settings.

1 4. ENVIRON was engaged by Leggett & Platt Incorporated in 1998 as a consultant,
2 to evaluate claims of contamination alleged in a complaint filed by Valley Alhambra, the Site
3 owner, against Leggett & Platt Incorporated, Dresher, Inc., and alleged prior tenants at the Site.
4 ENVIRON's evaluation was based on data reflected in reports filed with the California Regional
5 Water Quality Control Board -Los Angeles Region ("Regional Water Board") by RMT
6 Environmental in 1992 and 1993 in connection with the excavation and remediation of soil
7 adjacent to a former paint dip tank system, which was removed by RMT. We also reviewed
8 reports filed with the Regional Board in 1993 and 1994 by CLT Engineering Services, Valley
9 Alhambra's consultant, in connection with an investigation of the Site and reflecting the presence
10 of PCE and TCE in the subsurface adjacent to the paint tanks.

11 5. As a condition of the settlement of the litigation in 2000, Valley Alhambra and
12 Dresher Inc./Leggett & Platt, engaged ENVIRON to investigate and remediate the PCE/TCE
13 contamination reflected on the "Investigation Results Report" dated December 9, 1999 in
14 accordance with the terms of the Settlement Agreement between Valley Alhambra, Dresher, Inc.
15 and Leggett & Platt Incorporated.

16 6. The Regional Water Board issued a letter dated January 17, 2001 requiring a
17 Subsurface Site Assessment Work Plan. In that letter, the Regional Water Board requested
18 information regarding site use history and previous environmental investigations conducted at the
19 site.

20 7. Early in the investigation process, the Regional Water Board requested that
21 ENVIRON submit a work plan to identify the migration of contaminants off site on the property
22 located at 4880 East Valley Boulevard, west of the Site. In response, ENVIRON submitted the
23 "Work Plan for Off-Site HydroPunch and Bedrock Identification" dated February 22, 2001,
24 affecting the adjacent property owned at that time by the Corradini Corporation.

25 8. On April 30, 2001, ENVIRON submitted to the Regional Water Board its
26 "Response to Request for Subsurface Site Assessment Work Plan." ENVIRON's April 30, 2001
27 submittal addressed certain issues raised by the Regional Water Board in its letter dated January
28 17, 2001.

1 9. The historical uses of the site and prior environmental investigations, including
2 remediation efforts, were documented in Attachment C to ENVIRON's April 30, 2001 submittal.
3 Contrary to the statement in the June 11, 2008 Order from the Regional Water Board, the "dip
4 tanks" and underground storage tanks used in the bed frame assembly process were used to store
5 paints, not solvents, as reflected in reports filed with the Regional Board.

6 10. Documentation on the site geology/hydrogeology, including several regional maps
7 show the site to be located on shallow alluvial deposits, which lie above a non-waterbearing
8 formation. Based on ENVIRON's site investigation, including generally the stratigraphy
9 interpreted from boring logs and specifically two borings in which no ground water was
10 encountered in the southern portion of the site, the water-bearing strata at the site were confirmed
11 to be locally variable.

12 11. Research into ground water supply wells showed that there are no public supply or
13 privately owned wells within a one-mile radius of the Site.

14 12. Initially, the Regional Water Board approved the work plan and its addendum in a
15 letter dated April 18, 2001. However, the work plan was not implemented due to inability to gain
16 access to the Corradini property in spite of the efforts of ENVIRON, various attorneys, and the
17 Regional Water Board itself (letter dated June 5, 2001; see Exhibit B). The Regional Water
18 Board made no further demands to characterize the migration of contaminants off site.

19 13. On June 5, 2001, the Regional Water Board issued a letter regarding ENVIRON's
20 "Response to Request for a Subsurface Site Assessment Work Plan," dated April 30, 2001. In
21 that letter, the Regional Water Board required that a work plan be submitted to delineate soil
22 contamination west of the recognized source area. On June 20, 2001, ENVIRON submitted a
23 "Work Plan to Delineate Soil West of Suspected Source Area," which involved advancing two
24 soil borings (SB-1 and SB-2) along the western property boundary. This work was completed on
25 June 22, 2001 and an update was provided to the Regional Water Board in ENVIRON's "Status
26 of Project" letter dated October 31, 2001. The analytical laboratory reports of the soil samples
27 and a figure depicting the locations of the two soil borings (SB-1 and SB-2) are collectively
28 attached hereto as Exhibit C. Notably, SB-1 and SB-2 were advanced to the depth of the capillary

1 fringe, just above the water table. The results from the deepest samples were judged reflective of
2 ground water conditions and demonstrated only low or nondetectable concentrations of
3 contaminants at the western boundary of the Site, adjacent to 4880 East Valley Boulevard.

4 14. On April 30, 2001, ENVIRON submitted an "Interim Remedial Action Plan"
5 (IRAP) to address subsurface volatile organic compounds (VOCs). The Regional Water Board
6 authorized the implementation of the work on June 8, 2001. The remediation system, consisting
7 of 2-PHASE soil vapor and ground water extraction, began operating on December 6, 2001.
8 Following an October 8, 2002 on-site meeting with representatives from ENVIRON (George
9 Linkletter, Eddie Arslanian, and Bita Tabatabai) and the Regional Water Board (David Young
10 and J.T. Liu), the Regional Water Board authorized ENVIRON to shut down the remediation
11 system in order to evaluate possible rebound of VOCs in ground water. On October 15, 2002,
12 ENVIRON submitted to the Regional Water Board a "Request for Post-Remediation Monitoring"
13 documenting the outcome of the October 8, 2002 meeting (see Exhibit D).

14 15. Following the agreed upon number of post-remediation ground water monitoring
15 events, a meeting was held on November 18, 2003 between representatives from ENVIRON
16 (George Linkletter, Bita Tabatabai, and Eddie Arslanian) and the Regional Water Board (David
17 Young and J.T. Liu) to discuss the data from the post-remediation ground water monitoring and
18 protocols for confirmation soil sampling and a final round of ground water monitoring as a
19 prelude to site closure (No Further Action [NFA] designation).

20 16. On December 3, 2003, ENVIRON submitted its "Work Plan for Confirmation Soil
21 Sampling and Final Round of Ground water Sampling." The work plan included an historical
22 summary of the soil, soil gas, and ground water data collected from the Site. In a December 9,
23 2003 email (see Exhibit E), Mr. Young approved the work plan, noting that "the only comment I
24 have is with regard to analysis for VOCs. Due to the nature of this sampling event (confirmation
25 sampling for site closure), VOCs should be analyzed in both soil and ground water by EPA
26 Method 8260B. This analytical method covers a broader range of analytes, which is helpful
27 information in determining if the site is eligible for closure. Other than this issue, everything else
28 appears appropriate." ENVIRON addressed Mr. Young's comment using the requested method

1 on samples collected on December 18 and 22, 2003.

2 17. In a January 16, 2004 email (see Exhibit F), ENVIRON submitted to the Regional
3 Water Board the results of the confirmation soil sampling and final round of ground water
4 sampling and requested an NFA designation for the site. In a February 11, 2004 email (Exhibit
5 G), ENVIRON followed up with Mr. Young on the status of the NFA. In a February 24, 2004
6 email (see Exhibit H), Mr. Young requested a few items after talking to Regional Water Board
7 "management" for the "closure process." In a March 25, 2004 email (see Exhibit H), ENVIRON
8 submitted a case review form via electronic mail.

9 18. Following various emails between ENVIRON and Regional Water Board staff
10 (see Exhibit I), in a June 30, 2004 email (see Exhibit I), Mr. Liu stated that Mr. Young had begun
11 working on the NFA designation for the site.

12 19. In an August 10, 2004 email (see Exhibit J), ENVIRON once again submitted
13 information to Mr. Young regarding the Site use history.

14 20. Following various emails between ENVIRON and Regional Water Board staff
15 (see Exhibit K), in an October 1, 2004 email (see Exhibit L), Mr. Liu stated that the closure was
16 discussed with Dr. Arthur Heath, Remediation Section Chief.

17 21. In an October 6, 2004 telephone conversation with Mr. Liu, ENVIRON informed
18 the Regional Water Board that the Site is not located within the San Gabriel Valley Superfund
19 Area. Also, Mr. Liu stated that a deed restriction would be placed as part of the NFA designation
20 for the Site, restricting the use to non-sensitive receptors (i.e., excluding uses such as residential,
21 schools, health care). In an October 6, 2004 email (see Exhibit M), ENVIRON confirmed its
22 understanding of the results of the telephone discussion held earlier that day.

23 22. In a March 1, 2004 letter to the Regional Water Board (see Exhibit N), ENVIRON
24 requested removal of the remediation equipment from the Site. Subsequently, upon receiving the
25 Regional Water Board's approval, the remediation equipment was removed.

26 23. To address the Regional Water Board's concern that a deed restriction would be
27 required for unrestricted future use, and the implications of VOCs remaining in soil and ground
28 water, ENVIRON prepared a "Risk Assessment of Potential Migration of VOCs to Indoor Air,"

1 dated November 28, 2005. The risk assessment concluded that the "cumulative cancer risks are
2 no higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water
3 Board provide an NFA designation for "unrestricted use for the site." The Regional Water Board
4 submitted the risk assessment to the Office of Environmental Health Hazard Assessment
5 (OEHHA) for review. OEHHA provided its comments to the risk assessment in an email dated
6 January 17, 2006. On March 9, 2006, ENVIRON submitted a response to Regional Water Board
7 and OEHHA responding to the OEHHA comments. In its April 17, 2006 memorandum
8 addressed to the Regional Water Board, OEHHA stated that it agreed with ENVIRON's
9 conclusions regarding the risk assessment, but raised certain questions for Regional Water Board
10 consideration. The OEHHA memorandum was first submitted to ENVIRON via facsimile on
11 July 13, 2006.

12 24. On January 19, 2007, representatives from ENVIRON (George Linkletter, CY
13 Jeng, Eddie Arslanian), the Regional Water Board (Adnan Siddiqui¹ and David Young), and
14 representatives of the property owner and Leggett & Platt met to discuss the outstanding items
15 raised in the OEHHA memo. It is my recollection and understanding that, at that meeting, the
16 Regional Water Board agreed on an approach to address the various comments made by OEHHA.

17 25. At the January 19, 2007 meeting, Messrs. Siddiqui and Young indicated that they
18 would discuss with Regional Water Board upper management whether there would be a need to
19 conduct a post-remediation soil vapor study to confirm that there had been no change in the Site
20 from the last ground water sampling as part of the closure process.

21 26. In a March 16, 2007 telephone conversation, David Young stated to Eddie
22 Arslanian that Ms. Su Han had been assigned as the case supervisor for the Site, taking over from
23 Adnan Siddiqui. George Linkletter, Eddie Arslanian, Seema Sutarwala and Regional Water Board
24 staff (Su Han and David Young) met on May 16, 2008. At that meeting, in spite of the history of
25 events, as summarized above, Regional Water Board staff stated that additional work would be
26 required prior to obtaining closure for the Site. Regional Water Board staff, however, did not

27
28 ¹ Adnan Siddiqui took over the site supervisor position after J.T. Liu transferred to the
California Department of Toxic Substances Control.

1 identify any new evidence or changes of circumstance that would justify the Regional Water
2 Board's apparent change in position.

3 27. My opinion regarding the current status of the Site and the probability of off site
4 migration is based on the historical investigations conducted by other consultants, as well as
5 ENVIRON's Investigation Results Report and subsequent reports of ground water and soil
6 testing results.

7 28. In my opinion, investigation, assessment, and remediation activities conducted to
8 date, and the data derived as a result thereof, do not support the need for further investigation for
9 the following reasons:

- 10 • The Site is located on shallow alluvial deposits, which lie above a non-waterbearing
11 formation. Further, borings and wells installed at the Site confirm that the water-bearing
12 strata at the Site is locally non-contiguous and that there is relatively little water present.
13 In light of these data, contamination detected in shallow ground water beneath the Site
14 does not pose a threat to aquifers that may be present down valley to the west of the Site.
- 15 • There are no public supply or privately owned wells within a one-mile radius of the Site.
- 16 • Ground water testing between 2001 and 2003 demonstrated that PCE levels in the ground
17 water beneath the Site were reduced by orders of magnitude (e.g., from a peak of 4,800
18 $\mu\text{g/l}$ to 26 $\mu\text{g/l}$ at MW2, which is located immediately adjacent to the source area at the
19 Site) as a result of Regional Water Board approved remediation at the Site.
- 20 • Investigations relating to historic operations at the Site are inconclusive regarding the
21 cause of the PCE contamination at the Site but clearly defined the source area. Given the
22 results of the assessment, investigation, and remediation at the Site, it appears that source
23 contamination at the Site has been sufficiently remediated and remaining materials do not
24 pose a substantial risk to human health or the environment.
- 25 • Data collected from monitoring wells and soil borings along the western property line of
26 the Site (as well as other data points located downgradient from the source area), when
27 compared to substantially higher contamination levels in the source area on the Site and
28 within the context of the hydrostratigraphy at the Site, indicate only limited migration of

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contaminants away from the source area.

- The radius of influence of the remediation system that operated at the Site, which include an extraction well immediately adjacent to the Site’s western property line, indicate that the remedial process also addressed adjacent contamination which may have migrated to the downgradient property.
- The analytical results from the deepest samples were judged reflective of ground water conditions and demonstrated only low or nondetectable concentrations of contaminants along the western site boundary prior to the startup of the remediation system.
- ENVIRON prepared a “Risk Assessment of Potential Migration of VOCs to Indoor Air,” dated November 28, 2005, which concluded that the “cumulative cancer risks are no higher than 1×10^{-5} (mostly attributed to PCE) and recommended that the Regional Water Board provide an NFA designation for “unrestricted use for the site.” In its April 17, 2006 memorandum addressed to the Regional Water Board, OEHHA stated that it agreed with ENVIRON’s conclusions regarding the risk assessment.
- The Regional Water Board has previously determined that the Site is suitable for closure. To my knowledge, the Regional Water Board has no new information or evidence to suggest a change from the empirical results that the Regional Board relied on to authorize the removal of the remediation equipment in preparation to formally close the Site, and thus to justify the demand for additional investigation of VOC’s at the Site.
- Remaining contamination at and beneath the Site should dissipate without further active remediation and there is no evidence to suggest that it will pose a significant risk to human health or the environment.

29. The cost of additional investigation would require the development of a new scope of work for off-site investigation, installation of ground water wells, monitoring costs, additional reporting and related work.

30. Since approximately 1998, approximately \$913,000 has been spent to address environmental investigations and remediation at the Site. The minimum estimated costs to comply with the requirements of the Regional Water Board’s Order dated June 11, 2008 will

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1 likely be on the order of \$250,000, as illustrated in the estimate presented in the table below.

Order Requirement	Expenditures and Associated Timeframes
#1: Site Conceptual Model	\$25,000 (by August 19, 2008)
#2: Preparation and Implementation of Work Plan for Ground Water Characterization	\$25,000 (by August 19, 2008) \$130,000 (starting September 2008 – assuming Regional Water Board approval of work plan within 30 days of submittal)
#3: Preparation and Implementation of Work Plan for Soil Gas Investigation, and vapor Intrusion Evaluation.	\$10,000 (by August 2008) \$30,000 (between September and December 19, 2008)
#4: Resuming Semi-Annual Ground Water Monitoring	\$30,000 (minimum of 2 events). \$15,000 by January 31, 2009.

11 To date, ENVIRON has spent approximately \$913,000 in the site characterization, remediation
12 and follow up consultation and reports to secure a closure. This does not take into consideration
13 the costs incurred by RMT on behalf of Dresher Inc. or CLT Environmental on behalf of Valley
14 Alhambra. To date, I estimate, based on our records and the information provided in connection
15 with the RMT investigation and remediation and the CLT investigation, that over One Million
16 Dollars has been spent to characterize and remediate the Site.

17 31. It is my opinion that the information regarding the use history of the Site and data
18 from investigations by other consultants, ENVIRON's investigations, the ground water sampling
19 data submitted to the Regional Water Board after the completion of the remediation at the Site,
20 and the results of ENVIRON's human health risk assessment strongly suggest that there is a low
21 probability of significant off-site contamination migrating from the Site that would present an
22 unacceptable risk to human health.

23 32. It is also my opinion that, given the extensive work performed at the Site over the
24 last 10 years, characterization of the Site is sufficient to understand the pre- and post-remedial
25 conditions at the Site.

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33. Further, it is my opinion that the Regional Water Board's June 11, 2008 Order to commence a new investigation would result in excessive costs that will not result in corresponding benefits to public health and safety especially given the Regional Water Board's Order, which does not define the clear objectives of the additional testing.

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

Executed this 10th day of July, 2008, at Los Angeles, California.

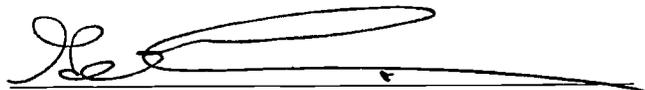

GEORGE O. LINKLETTER, Declarant

Exhibit A

George O. Linkletter, Ph.D.

1

Education

- 1971 Ph.D., Geology, University of Washington, Seattle
- 1967 A.M., Geology, Dartmouth College, Hanover, New Hampshire
- 1965 A.B., Geology, Dartmouth College, Hanover, New Hampshire

Registrations and Certifications

Professional Geologist, California

Experience

Dr. Linkletter is a Principal at ENVIRON International Corporation. He has over 35 years of experience in the fields of geochemistry and environmental, mathematical, engineering, and seismic geology. Since the early 1970s, when he developed one of the first academic programs in environmental geology in the United States, Dr. Linkletter has managed and participated in a wide range of projects dealing with industrial chemicals and wastes in the geologic and hydrologic environments. Many of these assignments were large interdisciplinary projects, including several projects designed to evaluate potential geoenvironmental-project interactions for facilities planned by the petroleum, utility, and hazardous waste management industries. These projects ranged from siting and designing waste management facilities to the characterization and remediation of environmental impairment at waste management facilities and industrial properties.

Dr. Linkletter managed and participated in the investigation and remediation of a number of USEPA and State of California Superfund sites. These assignments have included site investigations, remedial design and implementation, PRP allocation issues, and regulatory negotiation. Contaminants of concern at these sites have included chlorinated solvents, PCBs, heavy metals, asbestos, and petroleum hydrocarbons.

Throughout a broad spectrum of his work in the geological and engineering s geostatistics, sciences, Dr. Linkletter has had a strong focus on risk management, using applied mathematics, geostatistics, and decision analysis to quantify and manage uncertainty, thereby facilitating business decision making for his clients. For over a decade, Dr. Linkletter has served as a senior advisor and management consultant to major financial institutions and manufacturing firms, participating in the development and upgrading of corporate-wide environmental health and safety programs, guiding staffing decisions for corporate and divisional environmental programs, and establishing protocols for environmental due diligence.

Dr. Linkletter has an active litigation support/expert witness practice. Recent issues that have been the subject of his evaluation and testimony include the origin and timing of soil and ground water contamination, the standard of practice for environmental due diligence and related environmental tasks, compliance with the National Contingency Plan, and allocation of costs and responsibility

Dr. Linkletter has also participated in and directed scientific research projects and applied investigations in many parts of North America, South America, Europe, Africa, and both polar regions. Much of his work has included the development and use of computer models and

George O. Linkletter, Ph.D.

geochemical techniques to study complex natural systems. He has applied the results of these studies to a variety of programs ranging from investigations for the siting and design of lifelines and critical facilities to large weather-modification projects. Dr. Linkletter received the U.S. Antarctic Service Medal for his research in geology, glaciology, and polar meteorology, and has been an invited speaker at universities throughout the United States, Europe, and South America. Dr. Linkletter formerly was a Vice President with Woodward Clyde Consultants, and a Managing Principal with Harding Lawson Associates in southern California.

Representative Projects

- Aswan High Dam, Egypt - Project manager for comprehensive engineering evaluation of seismic stability of the High Dam. Assessment included seismic and engineering geology, hydrogeology, seismology, and earthquake and geotechnical engineering. Client: Government of Egypt/U.S. Agency for International Development.
- Litigation support, Wilmington, North Carolina - Provided litigation support, including expert witness deposition testimony, related to the timing and origin of chlorinated solvent contamination in ground water beneath a former refrigeration coil manufacturing facility. Client: O'Melveny & Myers.
- Site investigation, regulatory negotiation, Carson, California - Performed an evaluation of the origin of chlorinated solvents in fill soils, native soils, and ground water beneath a multi-tenant light industrial complex that had formerly been used for metal fabrication and oil field production. Assisted the land owner in obtaining a no further action letter in spite of the presence of chlorinated solvents in the ground water beneath the property. Client: Jones, Day, Reavis & Pogue.
- Air and hazardous materials permitting, Irvine, California - Assisted the owner of a newly acquired property to obtain the air and other hazardous materials storage and handling permits required to open a specialty chemical formulation facility. Client: Alpha Metals.
- Litigation support, San Luis Obispo, California - Provided litigation support, including deposition and trial testimony, related to the standard of practice for environmental due diligence and site investigation related to the acquisition of a former railroad property for residential use. Client: Beveridge & Diamond.
- Site investigation and remediation, Arrowbear, California - Conducted a site investigation and remedial design and implementation at a former gasoline station acquired by a bank through foreclosure. Issues included the presence of petroleum and aromatic hydrocarbons in ground water in fractured bedrock, and the release of contaminants from the ground water into nearby surface waters. Assisted the bank to obtain reimbursement through the California Underground Tank Fund. Client: Aldrich & Bonnefin
- Site investigation, risk assessment, regulatory negotiations, San Diego, California - Assisted attorneys for a property owner in obtaining regulatory closure on a former agricultural property from which an underground tank had been removed in an undocumented process and on which elevated concentrations of chlorinated pesticides had been found. The closure of unused water supply wells was also an issue. Client: O'Melveny & Myers.

George O. Linkletter, Ph.D.

- Site investigation, regulatory negotiations, City of Industry, California - Assisted attorneys to the owner/operator of a carpet manufacturing facility targeted for inclusion as a PRP in the San Gabriel Valley Superfund program in obtaining a no further action letter from the RWQCB, and thus avoid the Superfund PRP designation. Client: Kirkland & Ellis.
- Ground water investigation and remediation, Colorado - Project manager for multiphased evaluation, characterization, and remediation of volatile organic chemicals in two ground water plumes at a major electronics manufacturing facility. Statistical sampling design was used to limit the scope and costs of the investigation while achieving the required level of confidence in results. Client: Hewlett-Packard Company.
- Environmental due diligence for industrial acquisition - Managed the evaluation of world-wide environmental liabilities for a consortium of banks involved in the financing of Loral's purchase of Ford Aerospace. Client: Simpson Thacher & Bartlett.
- Ground water investigation and remediation, Palo Alto, California - Project Director for a large program that included the characterization and remediation of soil and ground water contamination by heavy metals and industrial solvents at two electronics manufacturing facilities and an area-wide Superfund site in Palo Alto. Client: Hewlett-Packard Company and Varian Associates.
- Site characterization and remediation, City of Commerce, California - Directed the comprehensive investigation of site use history and soil and ground water contamination and the remediation of soil and ground water contamination by chlorinated solvents and petroleum hydrocarbons at a former industrial manufacturing facility. Client: Jones, Day Reavis & Pogue.
- Emergency response 106 Order removal action, Los Angeles, California - Managed the planning and implementation of an emergency response removal action associated with a USEPA 106 Order issued to the owners and former operators of a metal plating facility. Issues included the presence of large volumes of highly concentrated chromic acid in deteriorating aboveground tanks, uncontrolled access to laboratory chemicals, contaminated plating vats and air handling systems, and the management of over 100,000 gallons of contaminated stormwater runoff. Client: McDermott, Will & Emery
- Litigation support, Anaheim, California - Provided litigation support, including expert testimony in deposition and at trial, related to the standard of practice for environmental due diligence and the origin of chlorinated solvents in soil and ground water at a former aircraft component manufacturing facility. Client: Kirkland & Ellis.
- Litigation support, Santa Clara County, California - Provided litigation support, including preparation of a declaration and an expert report related to historical mining, ore production and processing, and mining waste handling at the New Almaden mercury mine. Client: Beveridge & Diamond.
- Environmental due diligence, Huntington Beach, California - Conducted an environmental due diligence assessment for a sporting goods retailer that was acquiring neighboring properties to expand an existing retail facility. Provided oversight of the remediation of a former gasoline service station by the oil company that previously operated the station. Conducted Phase II investigations related to underground tanks and

George O. Linkletter, Ph.D.

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hydraulic hoists at a former recreational vehicle sale and service facility at the property.
Client: Sports Chalet/Trammell Crow.

- Litigation support, Sunnyvale, California - Provided litigation support and deposition testimony related to the origin of chlorinated solvents present in ground water beneath a office park located downgradient of several former semiconductor manufacturing facilities and service stations. Client: Quarles & Brady.
- Litigation support, El Cajon, California - Provided broad-based litigation support to the law firm defending an insurance carrier in a matter related to a claim of environmental damages. Issues included the timing and nature of a release of petroleum hydrocarbons from a former underground tank, the distribution of soil and ground water contamination, and remedial strategies and costs. Client: Morrison & Foerster.
- Environmental due diligence, Burbank, California - Assisted a major retailer in the evaluation of environmental issues related to the prospective purchase of a nearly 100 acre former aircraft manufacturing. Plans for the property called for comprehensive redevelopment into a regional-scale shopping center. Client: Wal-Mart.
- Litigation support, Sunnyvale, California - Provided a detailed critique of the technical approach to and costs of investigation and remedial work at a former semiconductor facility on behalf of a former owner/operator in a private CERCLA recovery action. Also assisted in the preparation for and participated in depositions of the technical experts designated by the adverse parties. Client: Pettit & Martin
- Environmental due diligence, nationwide - Assisted a major nationwide realty management company in developing its pre-acquisition environmental due diligence protocols and a program for annual post-acquisition evaluation of properties in the company's portfolio. ENVIRON conducts this program for the client and provides oversight of tenant response to recommended or mandated changes in their environmental management practices. Client: Confidential.
- Litigation support, Tampa, Florida - Provided comprehensive technical and regulatory litigation support and expert witness testimony for attorneys defending the former owner of a metal scrap yard from claims by the new owner for costs related to environmental investigations and remediation. The primary issues related to the requirements for, approach to, and costs for the investigation and remediation of soils contaminated with heavy metals, PCBs, and petroleum hydrocarbons. Client: Trenam, Simmons, Kemker, Scharf, Barkin, Frye & O'Neill.
- Litigation support, Tampa, Florida - Provided comprehensive technical and regulatory litigation support and expert witness testimony for attorneys defending the Hillsborough County, Florida in a suit that alleged that the County's mosquito abatement district had contaminated soils on portions of an island in Tampa Bay that was subsequently redeveloped into condominiums. The principal contaminants at issue were pesticides, PCBs, and petroleum hydrocarbons. Client: Trenam, Simmons, Kemker, Scharf, Barkin, Frye & O'Neill.
- Litigation support, Los Angeles, California - Provided litigation support to attorneys for a family trust from which land was taken by a school district in an eminent domain action. The primary dispute related to the school district's proposed reduction in the fair market

George O. Linkletter, Ph.D.

value of the property due to costs associated with the investigation and remediation of soil contamination from underground gasoline tanks. A favorable settlement was achieved when ENVIRON successfully demonstrated that much of the work undertaken by the district's consultant was unnecessary. Client: Richards, Watson & Greaten.

- Site investigation, Costa Mesa, California - Assisted the owner of a property used to manufacture munitions in dealing with the tenant responsible for ground water contamination with industrial solvents. Designed and conducted ground water investigations sufficient to demonstrate that the current tenant was likely responsible for the ground water contamination. Thereafter, on behalf of the landowner, provided oversight of the site investigation and remediation work conducted by the tenant's consultant. Also provided briefings for financial institutions considering involvement at the site. Client: Confidential.
- Site investigation, regulatory support, Houston, Texas - Assisted the owner/operator of a plastics fabrication facility to respond to a regulatory citation for the release of petroleum hydrocarbons to a surface drainageway. Conducted a soil sampling and analytical program that demonstrated that the observed impact was related to heavy, relatively immobile hydrocarbons only and that the impact was restricted to surficial soils, thereby eliminating the need for regulatory mandated remediation. Client: NAMPAC
- Site investigation, Superfund, litigation support, Burbank and Glendale, California - Assisted the owner of a long-term industrial site in the San Fernando Valley with the investigation of soil and ground water conditions at and near the site, and with the planning and design of interim and final remedial measures. Assisted with regulatory negotiations, Superfund (PRP) allocation issues, and insurance coverage claims. Client: Confidential.
- Site investigation, Universal City, California - Assisted MCA Development, the land owner for a facility used by Technicolor (tenant) to process movie film, by providing oversight and regulatory guidance related to Technicolor's removal of underground tanks and the investigation/remediation of contaminated soil and ground water at the property. Client: Seagrams.
- Waste minimization, San Pedro, California - Assisted the operator of a petrochemical storage facility in the Port of Los Angeles to evaluate and report its waste management practices in order to comply with government imposed waste minimization requirements. Client: GATX.
- Regulatory guidance, Carson, California - Provided advice and written testimony to attorneys representing the owner of properties near the Cal Compact landfill, for which an integrated remediation/redevelopment scheme was being considered by the California DTSC. Concerns related to the sufficiency of the site investigation/characterization on which the remedial plans were based, and plans to create vertically stratified Operable Units. Client: Kelley, Drye & Warren.
- Environmental due diligence, site investigations, and site remediation at various locations in the western United States - Worked with attorneys to Home Depot to provide technical assessments and regulatory guidance related to the acquisition of new properties to be redeveloped into Home Depot stores. Client: Latham & Watkins.

George O. Linkletter, Ph.D.

- Environmental due diligence, St. Louis, Mo. - Conducted an environmental due diligence evaluation of a former automotive manufacturing facility that was undergoing redevelopment for commercial and light industrial use. Client: The Koll Company.
- Litigation support, Los Angeles, California - Provided litigation support to attorneys representing the business successor to a paint manufacturing company that had once occupied a portion of what became Lawry's California Center. Issues related to the origin of chemicals found in the soil and ground water, the mechanisms through which those chemicals reached the soil, and the remedial requirements for the site. Client: Millard, Pilchowski, Holweger & Child.
- Litigation support, regulatory negotiations, site investigation and remediation, risk assessment, Commerce, California - On behalf of a former property owner, evaluated the need for planned remediations at the property, conducted risk assessment and vadose zone modeling to demonstrate that only a focused remediation was needed. Participated in negotiations with the RWQCB and the current site owner. Client: INSILCO
- Site investigation, remediation, Anaheim Hills, California - On behalf of attorneys representing a property owner, conducted an investigation of soil and ground water at a dry cleaning facility located in a shopping center. Designed and installed a soil vapor extraction remedial system that allowed the tenant space to continue to be used while remediation was ongoing. Client: O'Melveny & Myers.
- Ground water contamination assessment, southern California - Assisted the new owner of a golf course purchased from the Resolution Trust in dealing with an area-wide ground water contamination problem that originated at two nearby electronics two manufacturing facilities, but which had spread broadly beneath the golf course, thereby inhibiting development of on-site water supply needed for irrigation. Client: Confidential.
- Litigation support, San Diego, California - Provided broad-based technical and regulatory litigation support and expert witness assistance to attorneys defending an insurance company in an environmental claims action related to the costs to investigate and remediate soil contamination from an underground storage tank previously removed from the site. Client: O'Melveny & Myers.
- Site assessment and regulatory assistance, Santa Monica, California - Provided a detailed third-party review of a site investigation and remedial action plan prepared for the bankrupt landowner on behalf of the mortgage holder that wished to foreclose on the property. Assisted in negotiations with the Regional Water Quality Control Board, the oil company that had previously operated at the site, and the current site owner. Conducted forensic testing of samples of floating free product petroleum hydrocarbons in order to identify that age of the product and potentially the responsible oil company. Client: Mutual Benefit Life Insurance Company.
- Environmental due diligence, Yosemite National Park, California - ENVIRON provided a pro bono evaluation of environmental liabilities associated with concessionaire operations in Yosemite National Park in association with the efforts of a not-for-profit environmental organization to purchase the concession operations in the park after the then current operator was purchased by a foreign-owned corporation. Client: Skadden, Arps, Slate, Meagher & Flom.

George O. Linkletter, Ph.D.

- Litigation support, Santa Clara, California - Provided litigation support to attorneys defending an engineering consulting firm in a suit alleging negligent performance in the course of a pre-acquisition site assessment and subsequent site investigation at a former industrial site being redeveloped for residential use. Client: Ware & Freidenrich.
- Expert review panel, Los Angeles, California - Served as a member of an expert panel assembled to review a base isolation design for a major new trauma care facility being designed for Los Angeles County. Client: Fluor Daniel
- Environmental due diligence for acquisition of railroad facilities and equipment, nationwide - Managed Phase I and Phase II environmental audits and site assessments at numerous railcar repair and servicing facilities nationwide in association with the planned acquisition of the rolling stock and fixed-base assets of Itel. Client: General Electric Capital Corporation.
- Environmental due diligence, southern California - Provided a detailed assessment of an approximately 1,000 acre former aircraft manufacturing facility being redeveloped into a major mixed use complex on behalf of a potential investor. The assessment included comprehensive review of several large-scale site investigation and remedial design programs conducted by others in the past and of existing manufacturing operations on a part of the property. A Monte Carlo simulation approach was used to evaluate likely future costs related to environmental matters. Client: O'Melveny & Myers.
- Pre-demolition site investigation, San Diego, California - Performed an evaluation of site use history and the results of previous site investigations, conducted an asbestos survey, and located and sampled a series of underground tanks and sumps to assist a new land plan the demolition of a one block area on the edge of downtown San Diego. Client: Jones, Day, Reavis & Pogue.
- Crude oil pipeline, Ventura and Santa Barbara Counties, California - Project manager for seismic, geologic, and geotechnical evaluations for a crude oil pipeline to be used to transport oil produced offshore to an existing pipeline system, Probabilistic assessment techniques were used to quantify the seismic risk and specify the engineering design parameters for two major fault crossings. Client: Chevron USA.
- ANGTS Fault study, Alaska - Project manager for fault study for Alaska Natural Gas Transportation System pipeline. The project, which resulted in the specification of engineering design parameters for major active fault crossings, included analysis of remote sensing imagery, field reconnaissance and detailed field studies, and extensive mathematical modeling of seismic risk along proposed pipeline route. Client: Northwest Alaska Pipeline Company/Fluor Engineers.
- Oil refinery site characterization, Carson, California - Project manager for characterization of a 75-acre site that included a refinery, tank farm, land farm, and landfill. Research of historical site use information and the application of statistical sampling design techniques allowed the site conditions to be evaluated at a specified level of confidence prior to the sale of the property. Client: Cabot, Cabot and Forbes/Beacon Oil Company.
- Site assessment strategy, California - Project manager for a program to assist a major California bank in developing an environmental due diligence program to manage the

George O. Linkletter, Ph.D.

bank's risks associated with making loans on potentially contaminated properties. The program focused on development of screening and decision-making criteria, and on education of loan officers and appraisers. Client: Union Bank

- MX missile system environmental assessment, California/Nevada/Arizona/Utah - Managed and performed multiple assignments in support of U.S. Air Force's evaluation of environmental considerations related to siting a new defense system. Topics included water supply, seismic hazards, erosion problems, and development of remote sensing imagery interpretation techniques. Client: HDR/U.S. Air Force.
- Towers of San Diego, San Diego, California - Project sponsor and principal technical reviewer for geotechnical engineering evaluation and hazardous waste assessment for major high-rise redevelopment project. Work included a foundation investigation, seismic hazards evaluation, preliminary hazardous materials assessment, removal of underground storage tanks, and asbestos survey and removal. Client: Cabot, Cabot and Forbes.
- Liquefaction evaluation, San Juan, Argentina - Performed geologic and engineering evaluation of distribution of liquefaction and related structural damage following major earthquake along the foothills of the Andes. Analysis of remote sensing imagery led to the recognition that most liquefaction had occurred along paleo-stream channels, which had no topographic expression, but which provided the requisite soil and ground water conditions for liquefaction. Client: U.S. Geologic Survey.
- Surface impoundments evaluation, southern California - Project manager for evaluation of hazardous waste impoundments at electrical generating stations. Work resulted in comprehensive hydrogeologic assessment report for each station, in accordance with provisions of the California Toxic Pits Act. Client: Southern California Edison.
- Remedial investigation and remediation, southern California - Project sponsor and principal technical reviewer for comprehensive characterization and remediation of site with soil and ground water contamination by organic solvents. Remediation of five source areas and a complex ground water plume included limited soil excavation with on-site aeration, vapor extraction, and a pump-and-treat ground water system using both injection and extraction wells. Client: Confidential.
- Second-opinion review consultation, western United States - Provided individual consultation for corporate environmental health and safety department of a major electronics firm. Services focused on the technical review of consultant reports and strategic planning related to environmental impairment issues. Client: Hewlett-Packard.
- Site assessments for commercial real estate transactions, nationwide - Project manager for program of preliminary site assessments prior to purchase of properties by nationwide development company. Developed standard approach and protocols, coordinated technical staff assignments for consultant offices around the United States, and provided detailed technical review. Client: Cabot, Cabot and Forbes
- Lead smelter site characterization, Vernon, California - Supervised investigation of soil and ground water contamination at site used for smelting of lead for over 60 years. Contaminants included heavy metals, organic volatiles, and unusually low soil pH.

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9

Remediation focused on capping and pH adjustment instead of excavation and off-site disposal. Client: GNB.

- Metal smelter site characterization, El Segundo, California - Managed response to regulatory strike force demands for evaluation of conditions at property on the State's abandoned sites list. Considerations included arsenic in ground water, a large slag pile with high heavy metal concentrations, and uncontrolled access to old furnaces and a chemical laboratory. Client: Confidential.
- Lake Chakachamna hydroelectric project, Alaska - Managed geologic and geotechnical investigations for proposed lake tap hydroelectric project near Cook Inlet in the southern Alaska Range. Considerations included seismic and volcanic hazards, engineering geology for 11-mile-long tunnel, and glaciological evaluation of large natural ice dam that impounds Lake Chakachamna. Client: Bechtel/Alaska Power Authority.
- Regional landfill, eastern Pennsylvania - Performed siting study for an association of municipal governments to identify a suitable location for a large regional landfill. Limestone bedrock in the area severely limited the number of candidate sites. Geologic and hydrogeologic investigation, including tracer studies, led to the identification of a site that met all the mandated State siting criteria. Client: Confidential.
- Casmalia disposal site, Santa Maria, California - Served as senior technical reviewer for geologic and hydrogeologic aspects of evaluation of the Casmalia Class I disposal site. Work included evaluation of current conditions related to impoundments and landfills at the facility and assessment of options for closure of ponds and expansion of landfilling operations. Client: Casmalia Resources.
- Wilshire-Westwood project, Los Angeles, California - Managed investigation of soil contamination discovered during foundation excavation at a high-rise construction project in the Westwood District of Los Angeles. Statistical sampling design was used to formulate an excavation management plan, which resulted in significant savings over earlier estimates of the cost to handle the contaminated soil. Client: Poydras Services.
- Franciscan Ceramics project, Los Angeles, California - Directed the above- and below-ground site characterization, geotechnical evaluations, and remedial action plan preparation at the 45-acre Franciscan Ceramics site. The principal environmental issues included asbestos, PCBs, underground tanks and clarifiers, heavy metal-contaminated dust, and lead-contaminated manufacturing wastes. Client: Schurgin Development Companies
- Amusement park company acquisition, nationwide - Consultant to a major financial institution that was requested to fund the private acquisition of a large amusement park company with 40 sites nationwide. The major issue was underground storage tanks. The assignment included the evaluation of the potential financial exposure associated with known and possible environmental problems associated with the underground tanks. Client: Union Bank.
- Dairy acquisition, southern California - Directed the multi-phase evaluation of environmental liabilities associated with the processing and distribution facilities of a major dairy company under consideration for acquisition by an international food company. The principal issues were asbestos in existing structures and soil and ground

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water contamination beneath several underground tank installations. Client: Confidential.

- Risk management and consultation, nationwide - Reviewed existing technical reports and data regarding environmental conditions at sites throughout the United States on behalf of a major Japanese investment banking company. Provided independent third-party review, performed selected independent preliminary site assessments, and advised the client on risk management strategies. Client: Confidential.
- Seismic advisory committee, Los Angeles, California - Served as a member of the Organizing Committee for the Port of Los Angeles (POLA) Seismic Risk Subcommittee as a part of POLA's 2020 Program. Assisted in the development of a strategy for the Port to evaluate and engineer for regional and local seismic hazards that might impact existing facilities and planned 2020 developments in the Port. Client: Port of Los Angeles.

Professional Affiliations

American Association for the Advancement of Science

American Quaternary Association

Earthquake Engineering Res. Institute

The Explorers Club

Geological Society of America

International Glaciological Society

International Association of Mathematical Geology

Seismological Society of America

Publications and Presentations

Dr. Linkletter has authored and co-authored over 30 technical papers in the earth and atmospheric sciences. These papers have been published in the Journal of Glaciology, Antarctic Journal of the United States, New Zealand Journal of Geology and Geophysics, Mathematical Geology, Journal of Applied Meteorology, Journal de Recherches Atmospheriques, and the proceedings of national and international conferences.

Exhibit B



California Regional Water Quality Control Board

Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

Winston H. Hickox
Secretary for
Environmental
Protection

120 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: <http://www.swrcb.ca.gov/wqcb4>



Gray Davis
GOVERNOR

EA

June 5, 2001

Mr. Robert Anderson
Leggett & Platt, Incorporated
One Leggett Road
Carthage, MO 64836

REVIEW OF RESPONSE TO REQUEST FOR A SUBSURFACE SITE ASSESSMENT WORK PLAN; VALLEY-ALHAMBRA PROPERTY - 4900 EAST VALLEY BOULEVARD, LOS ANGELES, CALIFORNIA 90032 (SLIC NO. 957)

Dear Mr. Anderson:

Los Angeles Regional Water Quality Control Board (Regional Board) staff has reviewed the April 30, 2001 "Response to Request for a Subsurface Site Assessment Work Plan, Valley-Alhambra Property, 4900 East Valley Boulevard, Los Angeles, CA" (Response), prepared by Environ Corporation (Environ). The Response responds to the Regional Board correspondence of January 17, 2001, in which it was noted that the previous site investigations did not fully delineate the full extent of the volatile organic compound (VOC) plume. Environ's response to our correspondence provides a summary of the investigations to date and discusses the local and regional geology and hydrogeology. The Response indicates that there are no drinking water wells within one mile of the site and that the ground water beneath the site is found in thin alluvium over non-water bearing bedrock. The Response states that based on the previous investigations and a Regional Board letter dated October 21, 1994, that the soil has been sufficiently characterized.

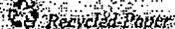
However, the "Investigation Results Report, Valley-Alhambra Property, 4900 East Valley Boulevard, Los Angeles, CA" dated December 9, 1999 and prepared by Environ, showed that the extent of VOC contamination in the soil west of the suspected source area is not fully defined. The October 21, 1994 Regional Board letter that is referred to in the Response pertained to the fuel hydrocarbons associated with contamination from a former underground tank, not the volatile organic compounds presently found on site.

You are required to submit a work plan to delineate soil west of the suspected source area for Regional Board review and approval by July 15, 2001. The plan shall include, but need not be limited to the following:

- a. The rationale for soil sampling locations, depths and sampling protocol for further delineation of the impact of VOCs and metals;
- b. The rationale for the number, locations and design of groundwater monitoring wells;
- c. A protocol to obtain groundwater flow direction and gradient;
- d. A health and safety plan;
- e. A chemical analysis plan to include analytical methods, detection limits, and other QA/QC requirements;
- f. An Investigation-Derived Waste Management Plan;
- g. A proposed project schedule.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/challenge.html>



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

Mr. Robert Anderson
Leggett & Platt

- 2 -

June 5, 2001

If you need clarification, or require additional information, please contact Mr. Sam Unger at (213) 576-6782.

Sincerely,



Rebecca Chou, Ph.D., P.E.
Chief of Site Cleanup Unit

cc: Bita Tabatabai, Environ
Joan C. Donnellan, Leland, Parachini, Stenberg, Matzger & Melnick, LLP
Gary J. Herman, Sr., S.D. Herman Co., Inc.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.
For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrch.ca.gov/news/echallenge.html>



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

Exhibit C



Del Mar Analytical

2852 Alton Ave., Irvine, CA 92608 (949) 261-1022 FAX (949) 261-1228
1014 E. Cooley Dr., Suite A, Colton, CA 92324 (909) 370-4687 FAX (909) 370-1046
9484 Chesapeake Dr., Suite 806, San Diego, CA 92123 (858) 505-8596 FAX (858) 505-9689
9830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851
2520 E. Sunset Rd. #3, Las Vegas, NV 89120 (702) 788-3620 FAX (702) 788-3621

Environ
2010 Main Street, 9th Floor
Irvine, CA 92614

Attention: Brett Moore

Subject: 2001 Valley Alhambra report, project 04-9065A
Del Mar Analytical report IKF0951

Dear Mr. Moore,

Please find enclosed a copy of the final report for the project referenced above as requested.

Should you have any questions or comments please contact me at (949) 261-1022; ext. 213.

Sincerely,
DEL MAR ANALYTICAL

Patty Mata
Project Manager

Enclosure



Del Mar Analytical

2852 Alton Ave., Irvine, CA 92605 (949) 251-1022 FAX (949) 251-1226
1014 E. Colby Dr., Suite A, Colton, CA 92324 (909) 370-4567 FAX (909) 370-1048
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6484 Chesapeake Dr., Suite 205, San Diego, CA 92123 (619) 595-8598 FAX (619) 595-8589
8830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

LABORATORY REPORT

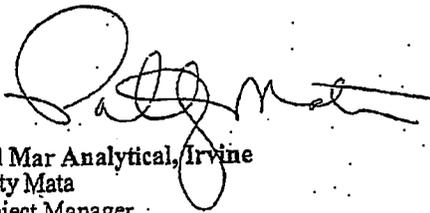
Prepared For: Environ-Irvine
2010 Main Street, 9th Floor
Irvine, CA 92614

Attention: Bita Tabatabai
Project: Valley Alhambra
04-9065A

Sampled: 06/22/01
Received: 06/22/01
Reported: 07/02/01

This laboratory report is confidential and is intended for the sole use of Del Mar Analytical and its client. This entire report was reviewed and approved for release.

CA ELAP Certificate #1197
AZ DHS License #AZ0428


Del Mar Analytical, Irvine
Patty Mata
Project Manager

MAILED

JUL 03 2001

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IKF0951 <Page 1 of 33>



Del Mar Analytical

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 9484 Chesapeake Dr., Suite 805, San Diego, CA 92123 (858) 505-8588 FAX (858) 505-9589
 9830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra

04-9065A

Report Number: IKF0951

Sampled: 06/22/01

Received: 06/22/01

SAMPLE CROSS REFERENCE

LABORATORY NUMBER	SAMPLE DESCRIPTION	SAMPLE MATRIX	ANALYSES
IKF0951-01	SB1-2-2.5	Soil	EPA 6010B EPA 7471A EPA 8260B
IKF0951-02	SB1-5-5.5	Soil	EPA 8260B
IKF0951-03	SB1-9.2-9.7	Soil	EPA 8260B
IKF0951-04	SB1-13-13.5	Soil	EPA 8260B
IKF0951-05	SB2-2-2.5	Soil	EPA 6010B EPA 7471A EPA 8260B
IKF0951-06	SB2-5-5.5	Soil	EPA 8260B
IKF0951-07	SB2-9.2-9.7	Soil	EPA 8260B
IKF0951-08	SB2-14-14.5	Soil	EPA 8260B

DEL MAR ANALYTICAL, IRVINE (CA ELAP #1197)

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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 8830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bita Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-01 (SB1-2-2.5 - Soil)								
Benzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	11F2825	20	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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 9830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
				ug/kg	ug/kg			
Sample ID: IKF0951-01 (SB1-2-2.5 - Soil)								
Styrene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	IIF2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)				105 %				
Surrogate: Toluene-d8 (80-120%)				101 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				103 %				

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IKF0951 <Page 4 of 11>



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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-02 (SB1-5-5.5 - Soil)								
Benzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Bromobenzene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Bromochloromethane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Bromodichloromethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Bromoform	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Bromomethane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
n-Butylbenzene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
sec-Butylbenzene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
tert-Butylbenzene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Carbon tetrachloride	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Chlorobenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Chloroethane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Chloroform	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Chloromethane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
2-Chlorotoluene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
4-Chlorotoluene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Dibromochloromethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Dibromomethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Dichlorodifluoromethane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
1,1-Dichloroethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dichloroethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,1-Dichloroethene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,2-Dichloropropane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,3-Dichloropropane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
2,2-Dichloropropane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,1-Dichloropropene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Ethylbenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Hexachlorobutadiene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
Isopropylbenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
p-Isopropyltoluene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Methylene chloride	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Naphthalene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
n-Propylbenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabaj	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-02 (SB1-5-5.5 - Soil)								
Styrene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Tetrachloroethene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Toluene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,2,3-Trichlorobenzene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
1,2,4-Trichlorobenzene	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
1,1,1-Trichloroethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,1,2-Trichloroethane	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Trichloroethene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Trichlorofluoromethane	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
1,2,3-Trichloropropane	EPA 8260B	I1F2908	10	ND	1	6/29/01	6/29/01	
1,2,4-Trimethylbenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
1,3,5-Trimethylbenzene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Vinyl chloride	EPA 8260B	I1F2908	5.0	ND	1	6/29/01	6/29/01	
o-Xylene	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
m,p-Xylenes	EPA 8260B	I1F2908	2.0	ND	1	6/29/01	6/29/01	
Surrogate: Dibromofluoromethane (85-125%)								96.8 %
Surrogate: Toluene-d8 (80-120%)								101 %
Surrogate: 4-Bromofluorobenzene (80-120%)								85.4 %

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IKF0951 <Page 6 of 33>



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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-03 (SB1-9.2-9.7 - Soil)								
Benzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoforn	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-03 (SB1-9.2-9.7 - Soil)								
Styrene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	11F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)								109 %
Surrogate: Toluene-d8 (80-120%)								102 %
Surrogate: 4-Bromofluorobenzene (80-120%)								100 %

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result		Factor	Extracted	
			ug/kg	ug/kg				
Sample ID: IKF0951-04 (SB1-13-13.5 - Soil)								
Benzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	

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 Project Manager

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-04 (SB1-13-13.5 - Soil)								
Styrene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	I1F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)								108 %
Surrogate: Toluene-d8 (80-120%)								102 %
Surrogate: 4-Bromofluorobenzene (80-120%)								100 %

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-05 (SB2-2-2.5 - Soil)								
Benzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	I1F2825	20	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-05 (SB2-2-2.5 - Soil)								
Styrene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	I1F2825	2.0	18	1	6/28/01	6/28/01	
Toluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	I1F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)								108 %
Surrogate: Toluene-d8 (80-120%)								102 %
Surrogate: 4-Bromofluorobenzene (80-120%)								102 %

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-06 (SB2-5-5.5 - Soil)								
Benzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	

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 Project Manager

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit	Sample Result	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-06 (SB2-5-5.5 - Soil)								
Styrene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Toluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	I1F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	I1F2825	2.0	2.4	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)				106 %				
Surrogate: Toluene-d8 (80-120%)				103 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				104 %				

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Environ-Irvine 2010 Main Street, 9th Floor. Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-07 (SB2-9.2-9.7 - Soil)								
Benzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromodichloromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Bromoform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Bromomethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
n-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
sec-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
tert-Butylbenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Carbon tetrachloride	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Chloroform	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Chloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
2-Chlorotoluene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
4-Chlorotoluene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromochloromethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dibromoethane (EDB)	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Dibromomethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichlorobenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,4-Dichlorobenzene	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Dichlorodifluoromethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloroethane	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
1,1-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,2-Dichloroethene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,3-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
2,2-Dichloropropane	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
1,1-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
cis-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
trans-1,3-Dichloropropene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Ethylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Hexachlorobutadiene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
Isopropylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
p-Isopropyltoluene	EPA 8260B	11F2825	20	ND	1	6/28/01	6/28/01	
Methylene chloride	EPA 8260B	11F2825	5.0	ND	1	6/28/01	6/28/01	
Naphthalene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	
n-Propylbenzene	EPA 8260B	11F2825	2.0	ND	1	6/28/01	6/28/01	

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result	Factor	Extracted	Analyzed	Qualifiers
			ug/kg	ug/kg				
Sample ID: IKF0951-07 (SB2-9.2-9.7 - Soil)								
Styrene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Tetrachloroethene	EPA 8260B	I1F2825	2.0	4.9	1	6/28/01	6/28/01	
Toluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,4-Trichlorobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,1,1-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,1,2-Trichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Trichlorofluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
1,2,3-Trichloropropane	EPA 8260B	I1F2825	10	ND	1	6/28/01	6/28/01	
1,2,4-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
1,3,5-Trimethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Vinyl chloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/28/01	
o-Xylene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
m,p-Xylenes	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/28/01	
Surrogate: Dibromofluoromethane (85-125%)				109 %				
Surrogate: Toluene-d8 (80-120%)				103 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				101 %				

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting	Sample	Dilution	Date	Date	Data
			Limit	Result				
			ug/kg	ug/kg				
Sample ID: IKF0951-08 (SB2-14-14.5 - Soil)								
Benzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Bromobenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Bromochloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Bromodichloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Bromoform	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Bromomethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
n-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
sec-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
tert-Butylbenzene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Carbon tetrachloride	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Chlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Chloroethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Chloroform	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Chloromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
2-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
4-Chlorotoluene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Dibromochloromethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dibromo-3-chloropropane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
1,2-Dibromoethane (EDB)	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Dibromomethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,3-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,4-Dichlorobenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Dichlorodifluoromethane	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
1,1-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dichloroethane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,1-Dichloroethene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
cis-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
trans-1,2-Dichloroethene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,3-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
2,2-Dichloropropane	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
1,1-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
cis-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
trans-1,3-Dichloropropene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Ethylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Hexachlorobutadiene	EPA 8260B	I1F2825	5.0	ND	1	6/28/01	6/29/01	
Isopropylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
p-Isopropyltoluene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	
Methylene chloride	EPA 8260B	I1F2825	20	ND	1	6/28/01	6/29/01	
Naphthalene	EPA 8260B	I1F2825	5.0	7.9	1	6/28/01	6/29/01	
n-Propylbenzene	EPA 8260B	I1F2825	2.0	ND	1	6/28/01	6/29/01	

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Method	Batch	Reporting Limit ug/kg	Sample Result ug/kg	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: IKF0951-08 (SB2-14-14.5 - Soil)								
Styrene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/29/01	
1,1,1,2-Tetrachloroethane	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/29/01	
1,1,2,2-Tetrachloroethane	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/29/01	
Tetrachloroethene	EPA 8260B	IIF2825	2.0	21	1	6/28/01	6/29/01	
Toluene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/29/01	
1,2,3-Trichlorobenzene	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/29/01	
1,2,4-Trichlorobenzene	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/29/01	
1,1,1-Trichloroethane	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/29/01	
1,1,2-Trichloroethane	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/29/01	
Trichloroethene	EPA 8260B	IIF2825	2.0	ND	1	6/28/01	6/29/01	
Trichlorofluoromethane	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/29/01	
1,2,3-Trichloropropane	EPA 8260B	IIF2825	10	ND	1	6/28/01	6/29/01	
1,2,4-Trimethylbenzene	EPA 8260B	IIF2825	2.0	23	1	6/28/01	6/29/01	
1,3,5-Trimethylbenzene	EPA 8260B	IIF2825	2.0	7.6	1	6/28/01	6/29/01	
Vinyl chloride	EPA 8260B	IIF2825	5.0	ND	1	6/28/01	6/29/01	
o-Xylene	EPA 8260B	IIF2825	2.0	5.0	1	6/28/01	6/29/01	
m,p-Xylenes	EPA 8260B	IIF2825	2.0	12	1	6/28/01	6/29/01	
Surrogate: Dibromofluoromethane (85-125%)				108 %				
Surrogate: Toluene-d8 (80-120%)				102 %				
Surrogate: 4-Bromofluorobenzene (80-120%)				100 %				

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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METALS

Analyte	Method	Batch	Reporting Limit mg/kg	Sample Result mg/kg	Dilution Factor	Date Extracted	Date Analyzed	Data Qualifiers
Sample ID: IKF0951-01 (SB1-2-2.5 - Soil)								
Antimony	EPA 6010B	I1F2642	10	ND	1	6/26/01	6/26/01	
Arsenic	EPA 6010B	I1F2642	2.0	ND	1	6/26/01	6/26/01	
Barium	EPA 6010B	I1F2642	1.0	36	1	6/26/01	6/26/01	
Beryllium	EPA 6010B	I1F2642	0.50	ND	1	6/26/01	6/26/01	
Cadmium	EPA 6010B	I1F2642	0.50	1.4	1	6/26/01	6/26/01	
Chromium	EPA 6010B	I1F2642	1.0	6.7	1	6/26/01	6/26/01	
Cobalt	EPA 6010B	I1F2642	1.0	3.3	1	6/26/01	6/26/01	
Copper	EPA 6010B	I1F2642	1.0	7.8	1	6/26/01	6/26/01	
Lead	EPA 6010B	I1F2642	1.0	4.0	1	6/26/01	6/26/01	
Mercury	EPA 7471A	I1F2635	0.020	0.19	1	6/26/01	6/26/01	
Molybdenum	EPA 6010B	I1F2642	2.0	ND	1	6/26/01	6/26/01	
Nickel	EPA 6010B	I1F2642	1.0	3.8	1	6/26/01	6/26/01	
Selenium	EPA 6010B	I1F2642	2.0	2.6	1	6/26/01	6/26/01	
Silver	EPA 6010B	I1F2642	1.0	ND	1	6/26/01	6/26/01	
Thallium	EPA 6010B	I1F2642	10	ND	1	6/26/01	6/26/01	
Titanium	EPA 6010B	I1F2642	2.0	340	1	6/26/01	6/26/01	
Vanadium	EPA 6010B	I1F2642	1.0	19	1	6/26/01	6/26/01	
Zinc	EPA 6010B	I1F2642	5.0	23	1	6/26/01	6/26/01	
Sample ID: IKF0951-05 (SB2-2-2.5 - Soil)								
Antimony	EPA 6010B	I1F2642	10	ND	1	6/26/01	6/26/01	
Arsenic	EPA 6010B	I1F2642	2.0	ND	1	6/26/01	6/26/01	
Barium	EPA 6010B	I1F2642	1.0	56	1	6/26/01	6/26/01	
Beryllium	EPA 6010B	I1F2642	0.50	ND	1	6/26/01	6/26/01	
Cadmium	EPA 6010B	I1F2642	0.50	2.2	1	6/26/01	6/26/01	
Chromium	EPA 6010B	I1F2642	1.0	12	1	6/26/01	6/26/01	
Cobalt	EPA 6010B	I1F2642	1.0	4.2	1	6/26/01	6/26/01	
Copper	EPA 6010B	I1F2642	1.0	10	1	6/26/01	6/26/01	
Lead	EPA 6010B	I1F2642	2.0	5.5	1	6/26/01	6/26/01	
Mercury	EPA 7471A	I1F2635	0.020	0.20	1	6/26/01	6/26/01	
Molybdenum	EPA 6010B	I1F2642	2.0	ND	1	6/26/01	6/26/01	
Nickel	EPA 6010B	I1F2642	1.0	5.5	1	6/26/01	6/26/01	
Selenium	EPA 6010B	I1F2642	2.0	3.3	1	6/26/01	6/26/01	
Silver	EPA 6010B	I1F2642	1.0	ND	1	6/26/01	6/26/01	
Thallium	EPA 6010B	I1F2642	10	ND	1	6/26/01	6/26/01	
Titanium	EPA 6010B	I1F2642	2.0	440	1	6/26/01	6/26/01	
Vanadium	EPA 6010B	I1F2642	1.0	25	1	6/26/01	6/26/01	
Zinc	EPA 6010B	I1F2642	5.0	28	1	6/26/01	6/26/01	

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	Data Limit	Qualifiers
Batch: IIF2825 Extracted: 06/28/01										
Blank Analyzed: 06/28/01 (IIF2825-BLK1)										
Benzene	ND	2.0	ug/kg							
Bromobenzene	ND	5.0	ug/kg							
Bromochloromethane	ND	5.0	ug/kg							
Bromodichloromethane	ND	2.0	ug/kg							
Bromoform	ND	5.0	ug/kg							
Bromomethane	ND	5.0	ug/kg							
n-Butylbenzene	ND	5.0	ug/kg							
sec-Butylbenzene	ND	5.0	ug/kg							
tert-Butylbenzene	ND	5.0	ug/kg							
Carbon tetrachloride	ND	5.0	ug/kg							
Chlorobenzene	ND	2.0	ug/kg							
Chloroethane	ND	5.0	ug/kg							
Chloroform	ND	2.0	ug/kg							
Chloromethane	ND	5.0	ug/kg							
2-Chlorotoluene	ND	5.0	ug/kg							
4-Chlorotoluene	ND	5.0	ug/kg							
Dibromochloromethane	ND	2.0	ug/kg							
1,2-Dibromo-3-chloropropane	ND	5.0	ug/kg							
1,2-Dibromoethane (EDB)	ND	2.0	ug/kg							
Dibromomethane	ND	2.0	ug/kg							
1,2-Dichlorobenzene	ND	2.0	ug/kg							
1,3-Dichlorobenzene	ND	2.0	ug/kg							
1,4-Dichlorobenzene	ND	2.0	ug/kg							
Dichlorodifluoromethane	ND	5.0	ug/kg							
1,1-Dichloroethane	ND	2.0	ug/kg							
1,2-Dichloroethane	ND	2.0	ug/kg							
1,1-Dichloroethene	ND	5.0	ug/kg							
cis-1,2-Dichloroethene	ND	2.0	ug/kg							
trans-1,2-Dichloroethene	ND	2.0	ug/kg							
1,2-Dichloropropane	ND	2.0	ug/kg							
1,3-Dichloropropane	ND	2.0	ug/kg							
2,2-Dichloropropane	ND	2.0	ug/kg							
1,1-Dichloropropene	ND	2.0	ug/kg							
cis-1,3-Dichloropropene	ND	2.0	ug/kg							
trans-1,3-Dichloropropene	ND	2.0	ug/kg							
Ethylbenzene	ND	2.0	ug/kg							

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Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951
 Sampled: 06/22/01
 Received: 06/22/01

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 Attention: Bitu Tabatabai

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	Data Qualifiers
Batch: I1F2825 Extracted: 06/28/01								
Blank Analyzed: 06/28/01 (I1F2825-BLK1)								
Hexachlorobutadiene	ND	5.0	ug/kg					
Isopropylbenzene	ND	2.0	ug/kg					
p-Isopropyltoluene	ND	2.0	ug/kg					
Methylene chloride	ND	20	ug/kg					
Naphthalene	ND	5.0	ug/kg					
n-Propylbenzene	ND	2.0	ug/kg					
Styrene	ND	2.0	ug/kg					
1,1,1,2-Tetrachloroethane	ND	5.0	ug/kg					
1,1,2,2-Tetrachloroethane	ND	2.0	ug/kg					
Tetrachloroethene	ND	2.0	ug/kg					
Toluene	ND	2.0	ug/kg					
1,2,3-Trichlorobenzene	ND	5.0	ug/kg					
1,2,4-Trichlorobenzene	ND	5.0	ug/kg					
1,1,1-Trichloroethane	ND	2.0	ug/kg					
1,1,2-Trichloroethane	ND	2.0	ug/kg					
Trichloroethene	ND	2.0	ug/kg					
Trichlorofluoromethane	ND	5.0	ug/kg					
1,2,3-Trichloropropane	ND	10	ug/kg					
1,2,4-Trimethylbenzene	ND	2.0	ug/kg					
1,3,5-Trimethylbenzene	ND	2.0	ug/kg					
Vinyl chloride	ND	5.0	ug/kg					
o-Xylene	ND	2.0	ug/kg					
m,p-Xylenes	ND	2.0	ug/kg					
Surrogate: Dibromofluoromethane	52.9		ug/kg	50.0		106	85-125	
Surrogate: Toluene-d8	51.1		ug/kg	50.0		102	80-120	
Surrogate: 4-Bromofluorobenzene	51.5		ug/kg	50.0		103	80-120	
LCS Analyzed: 06/28/01 (I1F2825-BS1)								
Benzene	48.4	2.0	ug/kg	50.0		96.8	75-130	
Bromobenzene	49.9	5.0	ug/kg	50.0		99.8	75-130	
Bromochloromethane	50.2	5.0	ug/kg	50.0		100	70-140	
Bromodichloromethane	54.1	2.0	ug/kg	50.0		108	75-135	
Bromoform	52.8	5.0	ug/kg	50.0		106	55-130	
Bromomethane	44.8	5.0	ug/kg	50.0		89.6	65-140	
n-Butylbenzene	50.0	5.0	ug/kg	50.0		100	75-130	
sec-Butylbenzene	49.6	5.0	ug/kg	50.0		99.2	80-135	
tert-Butylbenzene	47.0	5.0	ug/kg	50.0		94.0	75-130	

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: IIF2825 Extracted: 06/28/01										
LCS Analyzed: 06/28/01 (IIF2825-BS1)										
Carbon tetrachloride	49.8	5.0	ug/kg	50.0		99.6	70-160			
Chlorobenzene	51.8	2.0	ug/kg	50.0		104	75-130			
Chloroethane	48.5	5.0	ug/kg	50.0		97.0	65-135			
Chloroform	50.2	2.0	ug/kg	50.0		100	75-130			
Chloromethane	44.8	5.0	ug/kg	50.0		89.6	45-130			
2-Chlorotoluene	48.4	5.0	ug/kg	50.0		96.8	75-130			
4-Chlorotoluene	49.5	5.0	ug/kg	50.0		99.0	80-130			
Dibromochloromethane	51.9	2.0	ug/kg	50.0		104	70-140			
1,2-Dibromo-3-chloropropane	48.0	5.0	ug/kg	50.0		96.0	50-145			
1,2-Dibromoethane (EDB)	55.5	2.0	ug/kg	50.0		111	60-145			
Dibromomethane	51.6	2.0	ug/kg	50.0		103	65-135			
1,2-Dichlorobenzene	46.7	2.0	ug/kg	50.0		93.4	75-130			
1,3-Dichlorobenzene	47.4	2.0	ug/kg	50.0		94.8	75-130			
1,4-Dichlorobenzene	46.2	2.0	ug/kg	50.0		92.4	80-125			
Dichlorodifluoromethane	45.6	5.0	ug/kg	50.0		91.2	10-140			
1,1-Dichloroethane	50.5	2.0	ug/kg	50.0		101	75-135			
1,2-Dichloroethane	49.2	2.0	ug/kg	50.0		98.4	65-140			
1,1-Dichloroethene	50.7	5.0	ug/kg	50.0		101	70-145			
cis-1,2-Dichloroethene	48.0	2.0	ug/kg	50.0		96.0	70-130			
trans-1,2-Dichloroethene	50.4	2.0	ug/kg	50.0		101	75-140			
1,2-Dichloropropane	50.6	2.0	ug/kg	50.0		101	75-130			
1,3-Dichloropropane	55.9	2.0	ug/kg	50.0		112	65-140			
2,2-Dichloropropane	44.2	2.0	ug/kg	50.0		88.4	75-150			
1,1-Dichloropropene	47.2	2.0	ug/kg	50.0		94.4	75-140			
cis-1,3-Dichloropropene	52.8	2.0	ug/kg	50.0		106	65-135			
trans-1,3-Dichloropropene	53.6	2.0	ug/kg	50.0		107	65-140			
Ethylbenzene	50.7	2.0	ug/kg	50.0		101	75-135			
Hexachlorobutadiene	47.5	5.0	ug/kg	50.0		95.0	75-150			
Isopropylbenzene	49.1	2.0	ug/kg	50.0		98.2	80-135			
p-Isopropyltoluene	45.6	2.0	ug/kg	50.0		91.2	75-130			
Methylene chloride	50.1	20	ug/kg	50.0		100	70-125			
Naphthalene	45.0	5.0	ug/kg	50.0		90.0	50-145			
n-Propylbenzene	51.0	2.0	ug/kg	50.0		102	80-135			
Styrene	52.6	2.0	ug/kg	50.0		105	75-140			
1,1,1,2-Tetrachloroethane	52.7	5.0	ug/kg	50.0		105	75-135			
1,1,1,2,2-Tetrachloroethane	55.7	2.0	ug/kg	50.0		111	70-135			

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: 11F2825 Extracted: 06/28/01										
LCS Analyzed: 06/28/01 (11F2825-BS1)										
Tetrachloroethene	53.5	2.0	ug/kg	50.0		107	75-130			
Toluene	47.2	2.0	ug/kg	50.0		94.4	75-130			
1,2,3-Trichlorobenzene	45.6	5.0	ug/kg	50.0		91.2	50-140			
1,2,4-Trichlorobenzene	48.0	5.0	ug/kg	50.0		96.0	70-130			
1,1,1-Trichloroethane	48.3	2.0	ug/kg	50.0		96.6	75-140			
1,1,2-Trichloroethane	52.0	2.0	ug/kg	50.0		104	65-130			
Trichloroethene	47.3	2.0	ug/kg	50.0		94.6	75-130			
Trichlorofluoromethane	55.7	5.0	ug/kg	50.0		111	55-145			
1,2,3-Trichloropropane	53.2	10	ug/kg	50.0		106	60-140			
1,2,4-Trimethylbenzene	50.5	2.0	ug/kg	50.0		101	80-130			
1,3,5-Trimethylbenzene	50.7	2.0	ug/kg	50.0		101	80-135			
Vinyl chloride	44.3	5.0	ug/kg	50.0		88.6	45-140			
o-Xylene	49.8	2.0	ug/kg	50.0		99.6	75-130			
m,p-Xylenes	100	2.0	ug/kg	100		100	75-135			
Surrogate: Dibromofluoromethane	53.3		ug/kg	50.0		107	85-125			
Surrogate: Toluene-d8	51.0		ug/kg	50.0		102	80-120			
Surrogate: 4-Bromofluorobenzene	52.1		ug/kg	50.0		104	80-120			
Matrix Spike Analyzed: 06/28/01 (11F2825-MS1)										
Benzene	46.5	2.0	ug/kg	50.0	ND	93.0	45-140			
Bromodichloromethane	52.6	2.0	ug/kg	50.0	ND	105	75-140			
Bromoform	56.4	5.0	ug/kg	50.0	ND	113	55-150			
Chlorobenzene	49.5	2.0	ug/kg	50.0	ND	99.0	75-135			
Chloroform	49.2	2.0	ug/kg	50.0	ND	98.4	75-140			
Dibromochloromethane	52.5	2.0	ug/kg	50.0	ND	105	70-140			
1,4-Dichlorobenzene	43.8	2.0	ug/kg	50.0	ND	87.6	80-145			
1,1-Dichloroethane	49.8	2.0	ug/kg	50.0	ND	99.6	70-150			
1,2-Dichloroethane	50.2	2.0	ug/kg	50.0	ND	100	65-145			
1,1-Dichloroethene	49.8	5.0	ug/kg	50.0	ND	99.6	70-165			
Ethylbenzene	48.3	2.0	ug/kg	50.0	ND	96.6	55-140			
Naphthalene	50.2	5.0	ug/kg	50.0	ND	100	65-175			
Tetrachloroethene	50.0	2.0	ug/kg	50.0	ND	100	75-200			
Toluene	45.4	2.0	ug/kg	50.0	ND	90.8	50-140			
Trichloroethene	45.2	2.0	ug/kg	50.0	ND	90.4	75-145			
Vinyl chloride	41.5	5.0	ug/kg	50.0	ND	83.0	45-160			
o-Xylene	47.5	2.0	ug/kg	50.0	ND	95.0	75-150			
m,p-Xylenes	95.3	2.0	ug/kg	100	ND	95.3	55-160			

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: IIF2825 Extracted: 06/28/01										
Matrix Spike Analyzed: 06/28/01 (IIF2825-MS1)										
Source: IKF0951-01										
Surrogate: Dibromofluoromethane	54.4		ug/kg	50.0		109	85-125			
Surrogate: Toluene-d8	51.4		ug/kg	50.0		103	80-120			
Surrogate: 4-Bromofluorobenzene	52.4		ug/kg	50.0		105	80-120			
Matrix Spike Dup Analyzed: 06/28/01 (IIF2825-MSD1)										
Source: IKF0951-01										
Benzene	46.2	2.0	ug/kg	50.0	ND	92.4	45-140	0.647	20	
Bromodichloromethane	51.9	2.0	ug/kg	50.0	ND	104	75-140	1.34	20	
Bromoform	54.3	5.0	ug/kg	50.0	ND	109	55-150	3.79	30	
Chlorobenzene	49.3	2.0	ug/kg	50.0	ND	98.6	75-135	0.405	20	
Chloroform	48.0	2.0	ug/kg	50.0	ND	96.0	75-140	2.47	20	
Dibromochloromethane	51.8	2.0	ug/kg	50.0	ND	104	70-140	1.34	25	
1,4-Dichlorobenzene	44.9	2.0	ug/kg	50.0	ND	89.8	80-145	2.48	25	
1,1-Dichloroethane	48.5	2.0	ug/kg	50.0	ND	97.0	70-150	2.64	20	
1,2-Dichloroethane	49.0	2.0	ug/kg	50.0	ND	98.0	65-145	2.42	25	
1,1-Dichloroethene	49.0	5.0	ug/kg	50.0	ND	98.0	70-165	1.62	20	
Ethylbenzene	48.2	2.0	ug/kg	50.0	ND	96.4	55-140	0.207	20	
Naphthalene	48.4	5.0	ug/kg	50.0	ND	96.8	65-175	3.65	40	
Tetrachloroethene	50.6	2.0	ug/kg	50.0	ND	101	75-200	1.19	25	
Toluene	44.7	2.0	ug/kg	50.0	ND	89.4	50-140	1.55	20	
Trichloroethene	45.3	2.0	ug/kg	50.0	ND	90.6	75-145	0.221	20	
Vinyl chloride	41.3	5.0	ug/kg	50.0	ND	82.6	45-160	0.483	30	
o-Xylene	47.5	2.0	ug/kg	50.0	ND	95.0	75-150	0.00	20	
m,p-Xylenes	95.6	2.0	ug/kg	100	ND	95.6	55-160	0.314	20	
Surrogate: Dibromofluoromethane	54.0		ug/kg	50.0		108	85-125			
Surrogate: Toluene-d8	51.1		ug/kg	50.0		102	80-120			
Surrogate: 4-Bromofluorobenzene	52.1		ug/kg	50.0		104	80-120			

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: 11F2908 Extracted: 06/29/01										
Blank Analyzed: 06/29/01 (11F2908-BLK1)										
Benzene	ND	2.0	ug/kg							
Bromobenzene	ND	5.0	ug/kg							
Bromochloromethane	ND	5.0	ug/kg							
Bromodichloromethane	ND	2.0	ug/kg							
Bromoform	ND	5.0	ug/kg							
Bromomethane	ND	5.0	ug/kg							
n-Butylbenzene	ND	5.0	ug/kg							
sec-Butylbenzene	ND	5.0	ug/kg							
tert-Butylbenzene	ND	5.0	ug/kg							
Carbon tetrachloride	ND	5.0	ug/kg							
Chlorobenzene	ND	2.0	ug/kg							
Chloroethane	ND	5.0	ug/kg							
Chloroform	ND	2.0	ug/kg							
Chloromethane	ND	5.0	ug/kg							
2-Chlorotoluene	ND	5.0	ug/kg							
4-Chlorotoluene	ND	5.0	ug/kg							
Dibromochloromethane	ND	2.0	ug/kg							
1,2-Dibromo-3-chloropropane	ND	5.0	ug/kg							
1,2-Dibromoethane (EDB)	ND	2.0	ug/kg							
Dibromomethane	ND	2.0	ug/kg							
1,2-Dichlorobenzene	ND	2.0	ug/kg							
1,3-Dichlorobenzene	ND	2.0	ug/kg							
1,4-Dichlorobenzene	ND	2.0	ug/kg							
Dichlorodifluoromethane	ND	5.0	ug/kg							
1,1-Dichloroethane	ND	2.0	ug/kg							
1,2-Dichloroethane	ND	2.0	ug/kg							
1,1-Dichloroethene	ND	5.0	ug/kg							
cis-1,2-Dichloroethene	ND	2.0	ug/kg							
trans-1,2-Dichloroethene	ND	2.0	ug/kg							
1,2-Dichloropropane	ND	2.0	ug/kg							
1,3-Dichloropropane	ND	2.0	ug/kg							
2,2-Dichloropropane	ND	2.0	ug/kg							
1,1-Dichloropropene	ND	2.0	ug/kg							
cis-1,3-Dichloropropene	ND	2.0	ug/kg							
trans-1,3-Dichloropropene	ND	2.0	ug/kg							
Ethylbenzene	ND	2.0	ug/kg							

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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METHOD BLANK/OC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	RPD Limits RPD	RPD Limit	Data Qualifiers
Batch: IIF2908 Extracted: 06/29/01									
Blank Analyzed: 06/29/01 (IIF2908-BLK1)									
Hexachlorobutadiene	ND	5.0	ug/kg						
Isopropylbenzene	ND	2.0	ug/kg						
p-Isopropyltoluene	ND	2.0	ug/kg						
Methylene chloride	ND	20	ug/kg						
Naphthalene	ND	5.0	ug/kg						
n-Propylbenzene	ND	2.0	ug/kg						
Styrene	ND	2.0	ug/kg						
1,1,1,2-Tetrachloroethane	ND	5.0	ug/kg						
1,1,2,2-Tetrachloroethane	ND	2.0	ug/kg						
Tetrachloroethene	ND	2.0	ug/kg						
Toluene	ND	2.0	ug/kg						
1,2,3-Trichlorobenzene	ND	5.0	ug/kg						
1,2,4-Trichlorobenzene	ND	5.0	ug/kg						
1,1,1-Trichloroethane	ND	2.0	ug/kg						
1,1,2-Trichloroethane	ND	2.0	ug/kg						
Trichloroethene	ND	2.0	ug/kg						
Trichlorofluoromethane	ND	5.0	ug/kg						
1,2,3-Trichloropropane	ND	10	ug/kg						
1,2,4-Trimethylbenzene	ND	2.0	ug/kg						
1,3,5-Trimethylbenzene	ND	2.0	ug/kg						
Vinyl chloride	ND	5.0	ug/kg						
o-Xylene	ND	2.0	ug/kg						
m,p-Xylenes	ND	2.0	ug/kg						
Surrogate: Dibromofluoromethane	45.8		ug/kg	50.0		91.6	85-125		
Surrogate: Toluene-d8	49.5		ug/kg	50.0		99.0	80-120		
Surrogate: 4-Bromofluorobenzene	46.0		ug/kg	50.0		92.0	80-120		
LCS Analyzed: 06/29/01 (IIF2908-BS1)									
Benzene	54.7	2.0	ug/kg	50.0		109	75-130		
Bromobenzene	53.1	5.0	ug/kg	50.0		106	75-130		
Bromochloromethane	50.4	5.0	ug/kg	50.0		101	70-140		
Bromodichloromethane	51.2	2.0	ug/kg	50.0		102	75-135		
Bromoform	49.5	5.0	ug/kg	50.0		99.0	55-130		
Bromomethane	56.0	5.0	ug/kg	50.0		112	65-140		
n-Butylbenzene	50.6	5.0	ug/kg	50.0		101	75-130		
sec-Butylbenzene	52.2	5.0	ug/kg	50.0		104	80-135		
tert-Butylbenzene	50.9	5.0	ug/kg	50.0		102	75-130		

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/OC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: IIF2908 Extracted: 06/29/01										
LCS Analyzed: 06/29/01 (IIF2908-BS1)										
Carbon tetrachloride	59.6	5.0	ug/kg	50.0		119	70-160			
Chlorobenzene	54.2	2.0	ug/kg	50.0		108	75-130			
Chloroethane	49.9	5.0	ug/kg	50.0		99.8	65-135			
Chloroform	50.8	2.0	ug/kg	50.0		102	75-130			
Chloromethane	43.8	5.0	ug/kg	50.0		87.6	45-130			
2-Chlorotoluene	50.0	5.0	ug/kg	50.0		100	75-130			
4-Chlorotoluene	50.7	5.0	ug/kg	50.0		101	80-130			
Dibromochloromethane	51.2	2.0	ug/kg	50.0		102	70-140			
1,2-Dibromo-3-chloropropane	36.0	5.0	ug/kg	50.0		72.0	50-145			
1,2-Dibromoethane (EDB)	46.7	2.0	ug/kg	50.0		93.4	60-145			
Dibromomethane	50.1	2.0	ug/kg	50.0		100	65-135			
1,2-Dichlorobenzene	49.9	2.0	ug/kg	50.0		99.8	75-130			
1,3-Dichlorobenzene	51.6	2.0	ug/kg	50.0		103	75-130			
1,4-Dichlorobenzene	53.6	2.0	ug/kg	50.0		107	80-125			
Dichlorodifluoromethane	51.0	5.0	ug/kg	50.0		102	10-140			
1,1-Dichloroethane	46.8	2.0	ug/kg	50.0		93.6	75-135			
1,2-Dichloroethane	44.2	2.0	ug/kg	50.0		88.4	65-140			
1,1-Dichloroethene	51.7	5.0	ug/kg	50.0		103	70-145			
cis-1,2-Dichloroethene	47.9	2.0	ug/kg	50.0		95.8	70-130			
trans-1,2-Dichloroethene	52.4	2.0	ug/kg	50.0		105	75-140			
1,2-Dichloropropane	46.0	2.0	ug/kg	50.0		92.0	75-130			
1,3-Dichloropropane	49.4	2.0	ug/kg	50.0		98.8	65-140			
2,2-Dichloropropane	51.1	2.0	ug/kg	50.0		102	75-150			
1,1-Dichloropropene	51.1	2.0	ug/kg	50.0		102	75-140			
cis-1,3-Dichloropropene	52.5	2.0	ug/kg	50.0		105	65-135			
trans-1,3-Dichloropropene	50.9	2.0	ug/kg	50.0		102	65-140			
Ethylbenzene	56.7	2.0	ug/kg	50.0		113	75-135			
Hexachlorobutadiene	43.0	5.0	ug/kg	50.0		86.0	75-150			
Isopropylbenzene	50.4	2.0	ug/kg	50.0		101	80-135			
p-Isopropyltoluene	50.3	2.0	ug/kg	50.0		101	75-130			
Methylene chloride	45.9	2.0	ug/kg	50.0		91.8	70-125			
Naphthalene	34.7	5.0	ug/kg	50.0		69.4	50-145			
n-Propylbenzene	52.6	2.0	ug/kg	50.0		105	80-135			
Styrene	56.5	2.0	ug/kg	50.0		113	75-140			
1,1,1,2-Tetrachloroethane	58.5	5.0	ug/kg	50.0		117	75-135			
1,1,2,2-Tetrachloroethane	44.6	2.0	ug/kg	50.0		89.2	70-135			

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
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METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Data Qualifiers
Batch: 11F2908 Extracted: 06/29/01										
LCS Analyzed: 06/29/01 (11F2908-BS1)										
Tetrachloroethene	59.3	2.0	ug/kg	50.0		119	75-130			
Toluene	54.6	2.0	ug/kg	50.0		109	75-130			
1,2,3-Trichlorobenzene	41.3	5.0	ug/kg	50.0		82.6	50-140			
1,2,4-Trichlorobenzene	45.8	5.0	ug/kg	50.0		91.6	70-130			
1,1,1-Trichloroethane	53.4	2.0	ug/kg	50.0		107	75-140			
1,1,2-Trichloroethane	46.2	2.0	ug/kg	50.0		92.4	65-130			
Trichloroethene	50.6	2.0	ug/kg	50.0		101	75-130			
Trichlorofluoromethane	50.3	5.0	ug/kg	50.0		101	55-145			
1,2,3-Trichloropropane	38.4	10	ug/kg	50.0		76.8	60-140			
1,2,4-Trimethylbenzene	50.0	2.0	ug/kg	50.0		100	80-130			
1,3,5-Trimethylbenzene	51.7	2.0	ug/kg	50.0		103	80-135			
Vinyl chloride	56.4	5.0	ug/kg	50.0		113	45-140			
o-Xylene	56.5	2.0	ug/kg	50.0		113	75-130			
m,p-Xylenes	118	2.0	ug/kg	100		118	75-135			
Surrogate: Dibromofluoromethane	47.0		ug/kg	50.0		94.0	85-125			
Surrogate: Toluene-d8	49.9		ug/kg	50.0		99.8	80-120			
Surrogate: 4-Bromofluorobenzene	49.2		ug/kg	50.0		98.4	80-120			

Matrix Spike Analyzed: 06/29/01 (11F2908-MS1)				Source: IKF0787-07						
Benzene	55.9	2.0	ug/kg	50.0	ND	112	45-140			
Bromodichloromethane	51.7	2.0	ug/kg	50.0	ND	103	75-140			
Bromoform	51.1	5.0	ug/kg	50.0	ND	102	55-150			
Chlorobenzene	52.9	2.0	ug/kg	50.0	ND	106	75-135			
Chloroform	51.7	2.0	ug/kg	50.0	ND	103	75-140			
Dibromochloromethane	51.1	2.0	ug/kg	50.0	ND	102	70-140			
1,4-Dichlorobenzene	53.5	2.0	ug/kg	50.0	ND	107	80-145			
1,1-Dichloroethane	49.7	2.0	ug/kg	50.0	ND	99.4	70-150			
1,2-Dichloroethane	45.6	2.0	ug/kg	50.0	ND	91.2	65-145			
1,1-Dichloroethene	52.2	5.0	ug/kg	50.0	ND	104	70-165			
Ethylbenzene	55.3	2.0	ug/kg	50.0	ND	111	55-140			
Naphthalene	38.9	5.0	ug/kg	50.0	ND	77.8	65-175			
Tetrachloroethene	57.7	2.0	ug/kg	50.0	ND	115	75-200			
Toluene	55.8	2.0	ug/kg	50.0	ND	112	50-140			
Trichloroethene	53.4	2.0	ug/kg	50.0	ND	107	75-145			
Vinyl chloride	58.9	5.0	ug/kg	50.0	ND	118	45-160			
o-Xylene	55.8	2.0	ug/kg	50.0	ND	112	75-150			
m,p-Xylenes	115	2.0	ug/kg	100	ND	115	55-160			

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Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951

Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

VOLATILE ORGANICS by GC/MS (EPA 5030B/8260B)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: IIF2908 Extracted: 06/29/01										
Matrix Spike Analyzed: 06/29/01 (IIF2908-MS1)										
Surrogate: Dibromofluoromethane	46.8		ug/kg	50.0		93.6	85-125			
Surrogate: Toluene-d8	49.8		ug/kg	50.0		99.6	80-120			
Surrogate: 4-Bromofluorobenzene	48.0		ug/kg	50.0		96.0	80-120			
Matrix Spike Dup Analyzed: 06/29/01 (IIF2908-MSD1)										
Benzene	55.3	2.0	ug/kg	50.0	ND	111	45-140	1.08	20	
Bromodichloromethane	51.7	2.0	ug/kg	50.0	ND	103	75-140	0.00	20	
Bromoform	50.1	5.0	ug/kg	50.0	ND	100	55-150	1.98	30	
Chlorobenzene	52.7	2.0	ug/kg	50.0	ND	105	75-135	0.379	20	
Chloroform	52.3	2.0	ug/kg	50.0	ND	105	75-140	1.15	20	
Dibromochloromethane	50.3	2.0	ug/kg	50.0	ND	101	70-140	1.58	25	
1,4-Dichlorobenzene	52.7	2.0	ug/kg	50.0	ND	105	80-145	1.51	25	
1,1-Dichloroethane	50.1	2.0	ug/kg	50.0	ND	100	70-150	0.802	20	
1,2-Dichloroethane	44.3	2.0	ug/kg	50.0	ND	88.6	65-145	2.89	25	
1,1-Dichloroethene	53.7	5.0	ug/kg	50.0	ND	107	70-165	2.83	20	
Ethylbenzene	55.0	2.0	ug/kg	50.0	ND	110	55-140	0.544	20	
Naphthalene	36.6	5.0	ug/kg	50.0	ND	73.2	65-175	6.09	40	
Tetrachloroethene	57.5	2.0	ug/kg	50.0	ND	115	75-200	0.347	25	
Toluene	55.4	2.0	ug/kg	50.0	ND	111	50-140	0.719	20	
Trichloroethene	55.6	2.0	ug/kg	50.0	ND	111	75-145	4.04	20	
Vinyl chloride	60.3	5.0	ug/kg	50.0	ND	121	45-160	2.35	30	
o-Xylene	55.5	2.0	ug/kg	50.0	ND	111	75-150	0.539	20	
m,p-Xylenes	113	2.0	ug/kg	100	ND	113	55-160	1.75	20	
Surrogate: Dibromofluoromethane	46.6		ug/kg	50.0		93.2	85-125			
Surrogate: Toluene-d8	49.5		ug/kg	50.0		99.0	80-120			
Surrogate: 4-Bromofluorobenzene	48.4		ug/kg	50.0		96.8	80-120			

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 Project Manager

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
--	---	---

METHOD BLANK/OC DATA

METALS

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: I1F2635 Extracted: 06/26/01										
Blank Analyzed: 06/26/01 (I1F2635-BLK1)										
Mercury	ND	0.020	mg/kg							
LCS Analyzed: 06/26/01 (I1F2635-BS1)										
Mercury	0.837	0.020	mg/kg	0.800		105	85-120			
Matrix Spike Analyzed: 06/26/01 (I1F2635-MS1)										
Mercury	0.985	0.020	mg/kg	0.800	0.044	118	65-135			
Matrix Spike Dup Analyzed: 06/26/01 (I1F2635-MSD1)										
Mercury	0.880	0.020	mg/kg	0.800	0.044	104	65-135	11.3	20	
Batch: I1F2642 Extracted: 06/26/01										
Blank Analyzed: 06/26/01 (I1F2642-BLK1)										
Antimony	ND	10	mg/kg							
Arsenic	ND	2.0	mg/kg							
Barium	ND	1.0	mg/kg							
Beryllium	ND	0.50	mg/kg							
Cadmium	ND	0.50	mg/kg							
Chromium	ND	1.0	mg/kg							
Cobalt	ND	1.0	mg/kg							
Copper	ND	1.0	mg/kg							
Lead	ND	2.0	mg/kg							
Molybdenum	ND	2.0	mg/kg							
Nickel	ND	1.0	mg/kg							
Selenium	ND	2.0	mg/kg							
Silver	ND	1.0	mg/kg							
Thallium	ND	10	mg/kg							
Titanium	ND	2.0	mg/kg							
Vanadium	ND	1.0	mg/kg							
Zinc	ND	5.0	mg/kg							

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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IKF0951 <Page 30 of 33>



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 9484 Chesapeake Dr., Suite 805, San Diego, CA 92123 (858) 505-8596 FAX (858) 505-9589
 9830 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

Project ID: Valley Alhambra
 04-9065A
 Report Number: IKF0951
 Environ-Irvine
 2010 Main Street, 9th Floor
 Irvine, CA 92614
 Attention: Bitu Tabatabai
 Sampled: 06/22/01
 Received: 06/22/01

METHOD BLANK/QC DATA

METALS

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: IIF2642 Extracted: 06/26/01									
LCS Analyzed: 06/26/01 (IIF2642-BS1)									
Antimony	47.0	10	mg/kg	50.0		94.0	80-120		
Arsenic	45.3	2.0	mg/kg	50.0		90.6	80-120		
Barium	45.2	1.0	mg/kg	50.0		90.4	80-120		
Beryllium	45.6	0.50	mg/kg	50.0		91.2	80-120		
Cadmium	45.6	0.50	mg/kg	50.0		89.6	80-120		
Chromium	44.8	1.0	mg/kg	50.0		88.6	80-120		
Cobalt	44.3	1.0	mg/kg	50.0		91.0	80-120		
Copper	45.5	1.0	mg/kg	50.0		92.8	80-120		
Lead	46.4	2.0	mg/kg	50.0		89.8	80-120		
Molybdenum	44.9	2.0	mg/kg	50.0		87.6	80-120		
Nickel	43.8	1.0	mg/kg	50.0		89.2	80-120		
Selenium	44.6	2.0	mg/kg	50.0		92.4	80-120		
Silver	23.1	1.0	mg/kg	25.0		86.2	80-120		
Thallium	43.1	10	mg/kg	50.0		93.6	80-120		
Titanium	46.8	2.0	mg/kg	50.0		91.8	80-120		
Vanadium	45.9	1.0	mg/kg	50.0		94.4	80-120		
Zinc	47.2	5.0	mg/kg	50.0					
Matrix Spike Analyzed: 06/26/01 (IIF2642-MS1)									
Antimony	22.1	10	mg/kg	50.0	ND	44.2	75-125		M2
Arsenic	45.0	2.0	mg/kg	50.0	ND	87.2	75-125		
Barium	111	1.0	mg/kg	50.0	60	102	75-125		
Beryllium	44.4	0.50	mg/kg	50.0	ND	88.8	75-125		
Cadmium	44.2	0.50	mg/kg	50.0	1.5	85.4	75-125		
Chromium	63.8	1.0	mg/kg	50.0	16	95.6	75-125		
Cobalt	48.8	1.0	mg/kg	50.0	6.5	84.6	75-125		
Copper	62.9	1.0	mg/kg	50.0	16	93.8	75-125		
Lead	50.4	2.0	mg/kg	50.0	6.1	88.6	75-125		
Molybdenum	41.0	2.0	mg/kg	50.0	ND	81.5	75-125		
Nickel	56.6	1.0	mg/kg	50.0	14	85.2	75-125		
Selenium	43.7	2.0	mg/kg	50.0	ND	83.8	75-125		
Silver	22.4	1.0	mg/kg	25.0	ND	89.6	75-125		
Thallium	45.2	10	mg/kg	50.0	ND	83.0	75-125		
Titanium	1010	2.0	mg/kg	50.0	630	760	75-125		M-HA
Vanadium	84.6	1.0	mg/kg	50.0	29	111	75-125		
Zinc	89.1	5.0	mg/kg	50.0	45	88.2	75-125		

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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 9880 South 51st St., Suite B-120, Phoenix, AZ 85044 (480) 785-0043 FAX (480) 785-0851

Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
--	---	---

METHOD BLANK/QC DATA

METALS

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC %REC	%REC Limits	RPD RPD	RPD Limit	Data Qualifiers
Batch: IIF2642 Extracted: 06/26/01										
Matrix Spike Dup Analyzed: 06/26/01 (IIF2642-MSD1)										
Source: IKF0956-01										
Antimony	23.3	10	mg/kg	50.0	ND	46.6	75-125	5.29	20	M2
Arsenic	46.4	2.0	mg/kg	50.0	ND	90.0	75-125	3.06	20	
Barium	117	1.0	mg/kg	50.0	60	114	75-125	5.26	20	
Beryllium	45.8	0.50	mg/kg	50.0	ND	91.6	75-125	3.10	20	
Cadmium	46.5	0.50	mg/kg	50.0	1.5	90.0	75-125	5.07	20	
Chromium	66.5	1.0	mg/kg	50.0	16	101	75-125	4.14	20	
Cobalt	50.8	1.0	mg/kg	50.0	6.5	88.6	75-125	4.02	20	
Copper	66.8	1.0	mg/kg	50.0	16	102	75-125	6.01	20	
Lead	52.2	2.0	mg/kg	50.0	6.1	92.2	75-125	3.51	20	
Molybdenum	42.6	2.0	mg/kg	50.0	ND	84.7	75-125	3.83	20	
Nickel	58.9	1.0	mg/kg	50.0	14	89.8	75-125	3.98	20	
Selenium	46.4	2.0	mg/kg	50.0	ND	89.2	75-125	5.99	20	
Silver	23.4	1.0	mg/kg	25.0	ND	93.6	75-125	4.37	20	
Thallium	47.0	10	mg/kg	50.0	ND	86.6	75-125	3.90	20	
Titanium	1080	2.0	mg/kg	50.0	630	900	75-125	6.70	20	M-HA
Vanadium	89.3	1.0	mg/kg	50.0	29	121	75-125	5.41	20	
Zinc	94.1	5.0	mg/kg	50.0	45	98.2	75-125	5.46	20	

Del Mar Analytical, Irvine
 Patty Mata
 Project Manager

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Environ-Irvine 2010 Main Street, 9th Floor Irvine, CA 92614 Attention: Bitu Tabatabai	Project ID: Valley Alhambra 04-9065A Report Number: IKF0951	Sampled: 06/22/01 Received: 06/22/01
--	---	---

DATA QUALIFIERS AND DEFINITIONS

- M-HA Due to high levels of analyte in the sample, the MS/MSD calculation does not provide useful spike recovery information. See Blank Spike (LCS).
- M2 The MS and/or MSD were below the acceptance limits due to sample matrix interference. See Blank Spike (LCS).
- ND Analyte NOT DETECTED at or above the reporting limit or MDL, if MDL is specified.
- NR Not reported.
- RPD Relative Percent Difference

Del Mar Analytical, Irvine
Patty Mata
Project Manager

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ENVIRON

2010 Main St., Suite 900
Irvine, California 92614
(949) 261-5151
(949) 261-5202 (FAX)

CHAIN-OF-CUSTODY

PAGE 1 of 3

PROJECT NAME: Valley Alhambra FIELD PERSON: Alex Marr
 PROJECT NUMBER: 04-9065A PROJECT MANAGER: Bitu Tabatabaai
 PROJECT LOCATION: 4900 E. Valley Bl DATE: 6/22/01

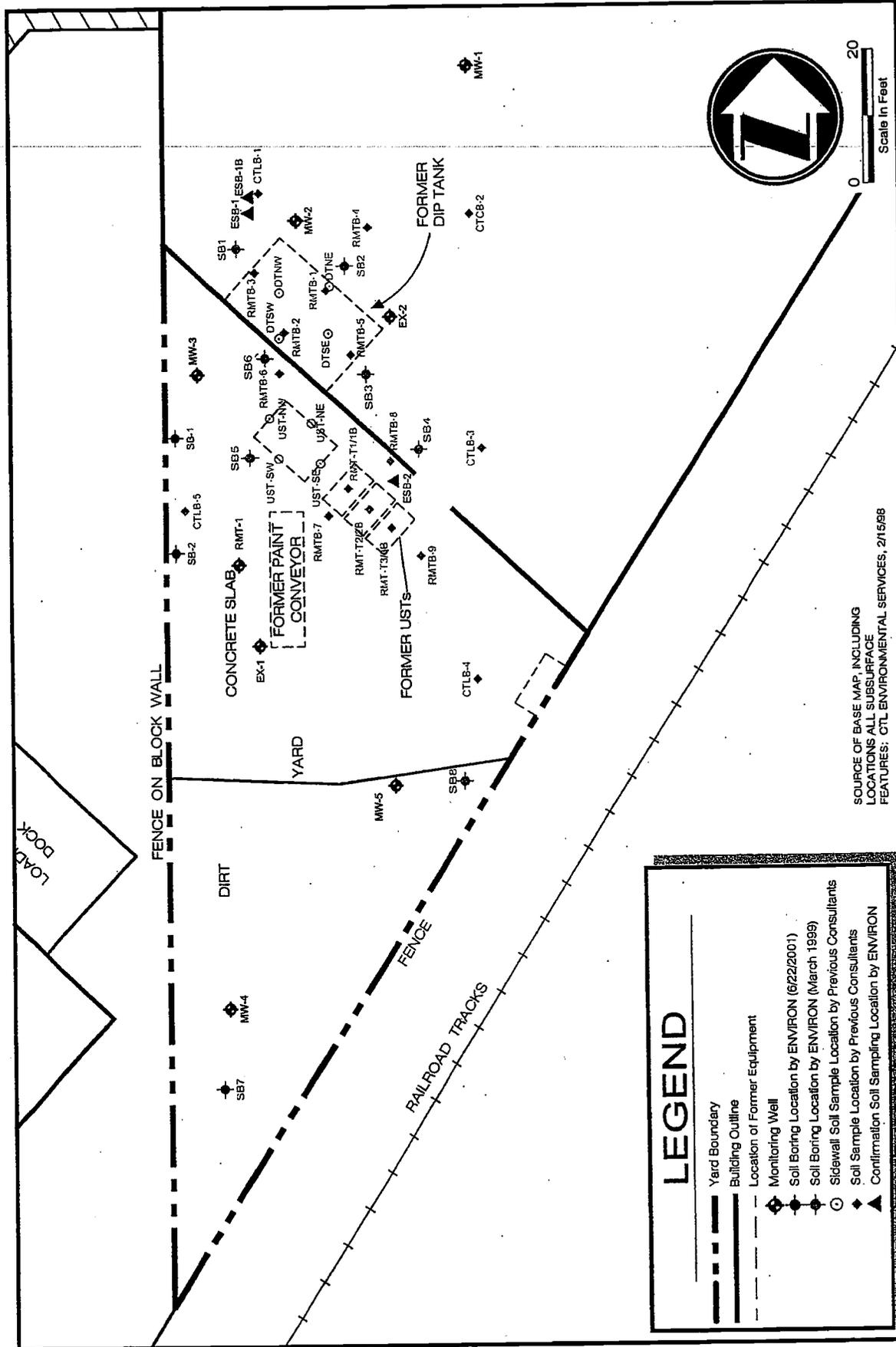
YEAR	LAB	SAMPLER	SIGNATURE	SAMPLE DATE	SAMPLE TIME	MATRIX (S) SOIL (G) GAS (W) WATER	NUMBER OF CONTAINERS	FILTERED/UNFILTERED (F/U)	PRESERVATION (SEE KEY)	ANALYSIS REQUIRED	COMMENTS
			<i>Alex Marr</i>	6-22	1244	S	1	h	100	✓	Please send
					1254		1			✓	analyzed
					1300		1			✓	Bitu Tabatabaai
					1307		1			✓	@ 949-261-5151
					1325		1			✓	Thanks
					1335		1			✓	
					1340		1			✓	
					1347		1			✓	
TOTAL											
											62

RECEIVED BY: *[Signature]* TIME/DATE: 6/22/01 @ 1700
 (COMPANY): DEC PAR
 RECEIVED BY: *[Signature]* TIME/DATE: 6/22/01 1755
 (COMPANY): DEC PAR
 RECEIVED BY: *[Signature]* TIME/DATE: 6/22/01 1755
 (COMPANY): DEC PAR

TURNAROUND TIME (CIRCLE ONE)
 72 HOURS
 24 HOURS
 48 HOURS
 5 DAYS
 NORMAL

SAMPLE INTEGRITY
 INTACT ON-ICE

H = HCL; N = HNO3; S = H2SO4; U = UNKNOWN; NO = NONE; O = OTHER



SOURCE OF BASE MAP, INCLUDING LOCATIONS ALL SUBSURFACE FEATURES: CTL ENVIRONMENTAL SERVICES, 2/15/98

LEGEND

- Yard Boundary
- Building Outline
- Location of Former Equipment
- ◆ Monitoring Well
- ◆ Soil Boring Location by ENVIRON (6/22/2001)
- ◆ Soil Boring Location by ENVIRON (March 1998)
- Sidewall Soil Sample Location by Previous Consultants
- ◆ Soil Sample Location by Previous Consultants
- ◆ Confirmation Soil Sampling Location by ENVIRON

Figure 5

Confirmation Soil Sampling Locations
4900 East Valley Boulevard
Los Angeles, California

ENVIRON

Drafter: JJC Date: 12/03/03 Contract Number: 04-9065A Approved: Revised: 1/23/04

Exhibit D

ENVIRON

October 15, 2002

Mr. J.T. Liu, P.E.
Mr. David Young
California Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: Request for Post-Remediation Monitoring
4900 East Valley Boulevard
Los Angeles, California (SLIC No. 967)

Dear Messrs. Liu and Young:

Enclosed please find the Third Quarter 2002 ground water monitoring report for 4900 East Valley Boulevard, Los Angeles, California (Site).

On October 8, 2002, Dr. George Linkletter, Bitu Tabatabai, and Eddie Arslanian of ENVIRON International Corporation (ENVIRON) met with you, as representatives from the California Regional Water Quality Control Board – Los Angeles Region (Regional Board), at the Site to review the history of chemical use at the Site and prior site characterization activities, and to discuss the status of remedial activities.

As discussed at the meeting, the 2-PHASE™ Extraction system used to treat volatile organic compounds (VOCs) in soil and ground water at the Site has been very effective. VOCs in ground water have decreased from concentrations of upwards of 4,800 micrograms per liter ($\mu\text{g}/\text{l}$) of tetrachloroethene, the primary VOC constituent at the Site, to near or below its maximum contaminant level of 5 $\mu\text{g}/\text{l}$, as established by the United States Environmental Protection Agency.

At the conclusion of the meeting, we requested, and you verbally agreed, that we be allowed to shut down the 2-PHASE™ Extraction system and to commence ground water monitoring to evaluate VOC rebound effects, if any. The system was shut down in your presence at approximately 2:00 p.m. on October 8, 2002. ENVIRON has tentatively scheduled the Fourth Quarter 2002 ground water monitoring event for the first week of December 2002. As you requested, ENVIRON will notify the Regional Board of the exact date, approximately one week in advance, once it has been scheduled.

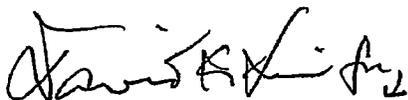
Messrs. J.T. Liu and David Young

-2-

October 15, 2002

On behalf of the entities that have assumed the task of addressing the presence of chlorinated solvents in the soil and ground water at the Site, we wish to restate our appreciation for your prompt attention to our request for a meeting to review the recent efforts to complete the remediation of this Site. As you can see from the monitoring data, it appears that we are very close to the point at which we will request closure, and we will further appreciate the Regional Board's expedited review of future submittals in anticipation of achieving a "closure" status.

Very truly yours,



George O. Linkletter, Ph.D., R.G. (No. 3728)
Principal



Bita Tabatabai, P.E. (No. C51294)
Manager



Eddie Arslanian
Senior Associate

\\Losangelesnt1\projects\A\Alhambra\Regional Board Correspondence\Cover Letter for 2002 3Q Ground Water Report.doc

Enclosure

Copy: Mr. Robert Anderson, Leggett & Platt
Ms. Joan Donnellan, Leland, Parachini, Steinberg, Matzger & Melnick, LLP
Mr. Gary Herman, S.D. Herman Co., Inc

Exhibit E

-----Original Message-----

From: Eddie Arslanian
Sent: Wednesday, December 10, 2003 9:21 AM
To: 'David Young'
Cc: Ju-Tseng Liu; George Linkletter; Bitu Tabatabai
Subject: RE: Work Plan for Valley Alhambra Property

David, we will analyze the soil/gw samples by 8260B instead of 8021B. Historical soil samples have been analyzed by 8260B. However, please note that the quarterly gw samples have been historically analyzed by 8021B. Therefore, there could be some discrepancies in the gw samples results now between the 8021B and 8260B.

we are trying to arrange the sampling activities for next thursday the 18th. I will let you know once it gets finalized.

thanks.

-----Original Message-----

From: David Young [mailto:dyoung@rb4.swrcb.ca.gov]
Sent: Tuesday, December 09, 2003 4:17 PM
To: EArslanian@environcorp.com
Cc: Ju-Tseng Liu
Subject: Work Plan for Valley Alhambra Property

Hi Eddie,
I reviewed the Work Plan for Confirmation Soil Sampling and Final Round of Ground Water Sampling at Valley Alhambra Property, dated December 3, 2003. The only comment I have is with regard to analysis for VOCs. Due to the nature of this sampling event (confirmation sampling for site closure), VOCs should be analyzed in both soil and ground water by EPA Method 8260B. This analytical method covers a broader range of analytes, which is helpful information in determining if the site is eligible for closure. Other than this issue, everything else appears appropriate. Please let me know when you are planning on doing the proposed work so I can arrange my schedule to be there. Thanks, and let me know if you have any questions.

David A. Young
Engineering Geologist
Site Cleanup II
(213) 576-6744

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
***For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>

Exhibit F

From: Eddie Arslanian

Sent: Fri 1/16/2004 4:04 PM

To: 'Ju-Tseng Liu'; 'David Young'

Cc: Bitu Tabatabai; George Linkletter

Subject: Valley-Alhambra: Confirmation Soil and Ground Water Sampling Results

Attachments: [9065af3n Figure 3.pdf\(252KB\)](#) [Table 1.xls\(32KB\)](#) [Table 2.xls\(19KB\)](#) [Table 3.xls\(19KB\)](#) [Table 4.xls\(20KB\)](#)

[View As Web Page](#)

Gentlemen,

As mutually agreed in our meeting on November 18, 2003, ENVIRON conducted confirmation soil sampling and one final round of ground water sampling at the Site prior to the LARWQCB's issuance of a "No Further Action" designation for the site. The sampling activities were conducted to evaluate the presence of volatile organic compounds (VOCs), in addition to 1,4-dioxane, 1,2,3-trichloropropane (1,2,3-TCP), Title 22 metals, polychlorinated biphenyls (PCBs), and organochloride pesticides.

Ground Water Sample Results

Ground water sampling activities were conducted on December 18, 2003. In summary, VOC concentrations (PCE, TCE, cis-1,2-DCE) were consistent or lower than concentrations measured in prior quarters. Detected Title 22 metal concentrations were indicative of background concentrations and below California Maximum Contaminant Levels. Concentrations of 1,4-dioxane, 1,2,3-TCP, PCBs, and organochloride pesticides were not found above their respective laboratory reporting limits (RLs). Table 1 includes historical and recent results of VOCs found in ground water. Table 2 includes detected Title 22 dissolved metals found in ground water.

Soil Sample Results

Confirmation soil sampling activities were conducted on December 22, 2003 and January 6, 2004. The attached figure shows the locations of the confirmation soil samples approved by the LARWQCB, ESB-1 and ESB-2. PCE was found at concentrations ranging from below laboratory RLs of 4 micrograms per kilogram (ug/kg) to 140 ug/kg at ESB1-10'. The concentration of PCE at ESB1-12 was lower at 37 ug/kg. Other VOCs detected included toluene at up to 320 ug/kg, ethylbenzene up to 19 ug/kg, and xylenes up to 108 ug/kg. Detected Title 22 metal concentrations were indicative of background concentrations. Concentrations of 1,4-dioxane, 1,2,3-TCP, PCBs, and organochloride pesticides were not found above their respective laboratory RLs. Table 2 summarizes the analytical data for soil samples.

Based on the results of the soil and ground water samples presented herein, ENVIRON recommends that the LARWQCB issue a "No Further Action" designation for the site. We will submit a full report including all laboratory analytical results, data validation reports, and figures within the next couple of week.

Upon receiving your verbal authorization, ENVIRON will remove the remediation equipment and abandon the wells from the site. Furthermore, ENVIRON will assist the LARWQCB with preparation of the Site Closure Form.

Thank you.

<<9065af3n Figure 3.pdf>> <<Table 1.xls>> <<Table 2.xls>> <<Table 3.xls>> <<Table 4.xls>>

Eddie Arslanian, P.E.
ENVIRON International Corporation

707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

<<9065af3n Figure 3.pdf>> <<Table 1.xls>> <<Table 2.xls>> <<Table 3.xls>> <<Table
4.xls>>

Exhibit G

From: Eddie Arslanian
Sent: Wednesday, February 11, 2004 11:31 AM
To: 'Ju-Tseng Liu'; 'David Young'
Cc: Bitu Tabatabai; George Linkletter
Subject: Status on 4900 Valley Boulevard

Gentlemen,

We would like to inquire about the status of the "No Further Action" request for the site.

Could you please inform us as to when we can expect to receive a response from the Regional Board? Our client and the existing tenant at the site are eager to remove the remediation equipment and restore the site.

Thank you.

Eddie Arslanian, P.E.

ENVIRON International Corporation

707 Wilshire Boulevard, Suite 4950

Los Angeles, California 90017

Tel: 213.943.6326

Fax: 213.943.6301

Exhibit H

From: Eddie Arslanian

Sent: Thu 3/25/2004 6:55 PM

To: 'David Young'; 'Ju-Tseng Liu'

Cc: George Linkletter; Bita Tabatabai

Subject: RE: Valley Alhambra Closure

Attachments:  Case review form.doc(59KB)

[View As Web Page](#)

Gentlemen,

Attached for your review, please find the closure form. If you have any questions, please contact me.

-----Original Message-----

From: David Young [<mailto:dyoung@rb4.swrcb.ca.gov>]

Sent: Tuesday, February 24, 2004 10:55 AM

To: Eddie Arslanian

Cc: Ju-Tseng Liu

Subject: Valley Alhambra Closure

Hi Eddie. After talking with management about this case we need the following to be completed:

- 1) A closure report that summarizes assessment/remediation at the site with a section addressing confirmation sampling results (soil/water). Within this section provide justification of why it is acceptable to leave 140 ug/kg in soil @ 10 ft bgs. Feel free to include any other pertinent information that would support closing this case.
- 2) Submit a case review form (attached) electronically for the Regional Board to review/edit.
- 3) Submit 2 hard copies of the closure report as well as an electronic copy, which you can send to my email address (dyoung@rb4.swrcb.ca.gov).

Thanks, and call me if you have any questions at (213) 576-6744.

David A. Young
Engineering Geologist
Site Cleanup II

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption

***For a list of simple ways to reduce demand and cut your energy costs, see the tips at:

<http://www.swrcb.ca.gov/news/echallenge.html> ***

<<Case review form.doc>>

Exhibit I

From: [Ju-Tseng Liu \[JLIU@rb4.swrcb.ca.gov\]](mailto:JLIU@rb4.swrcb.ca.gov)

Sent: Wed 6/30/2004 2:07 PM

To: [Eddie Arslanian](#)

Cc: [David Young](#)

Subject: RE: Closure Review for Valley Alhambra

Attachments:

[View As Web Page](#)

**** Reply Requested When Convenient ****

Hi Eddie:

Thanks for the email. I have talked with Dave today and he has begun working on the NFA for Valley Alhambra. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 06/30/04 12:59PM >>>

Hello David,

Can you provide me an update on this?

THanks.

-----Original Message-----

From: Ju-Tseng Liu [<mailto:JLIU@rb4.swrcb.ca.gov>]
Sent: Wednesday, June 16, 2004 2:02 PM
To: Eddie Arslanian
Cc: David Young
Subject: RE: Review of NFA Forms for two sites

**** Reply Requested When Convenient ****

Hi Eddie:

Thanks for your email. Dave Young is now working on another priority brownfield site closure. I will ask Dave to give you a call to provide an update to you. Take care. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EArslanian@environcorp.com> 06/15/04 09:36AM >>>

JT, thank you for your expedited review of the West Valley Cleaners NFA form.

I still haven't heard from David Young on the Valley Alhambra form. Could you please give us an update? We would like to move forward with well abandonment activities to completely get out of the way of the new tenant at the site.

Thanks in advance.

-----Original Message-----

From: Ju-Tseng Liu [mailto:JLIU@rb4.swrcb.ca.gov]

Sent: Tuesday, May 25, 2004 11:53 AM

To: Eddie Arslanian

Cc: Arthur Heath; David Young

Subject: Re: Review of NFA Forms for two sites

** Reply Requested When Convenient **

Eddie:

Thanks for your email. We are making some minor revisions of the closure letter for West Valley Cleaners and will submit the closure packet to upper management for approval tomorrow.

I will ask Dave Young to give you an update on Valley Alhambra closure. Take care. JT

J.T. Liu

Senior Water Resources Control Engineer

Los Angeles Regional Water Quality Control Board

Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EArslanian@environcorp.com> 05/25/04 09:19AM >>>

> Dear JT,

>

> Could you please give me an update on the review status for the following sites?

>

> * SLIC No. 1006 (West Valley Cleaners, a.k.a., Tampa Vanowen Shopping Center): Dr. Arthur Heath informed us last week that he submitted the NFA package to you for review.

>

> * SLIC No. 967 (Valley-Alhambra): We sent the NFA package to you and David Young on March 25, 2004. I have followed up with David Young on a couple of occasions but I think he's been pretty busy.

>

> Please call me at 213-943-6326 if you have any questions. Thank you

>

>

>

>

>

> Eddie Arslanian, P.E.

> ENVIRON International Corporation

> 707 Wilshire Boulevard, Suite 4950

> Los Angeles, California 90017
> Tel: 213.943.6326
> Fax: 213.943.6301
>

Exhibit J

From: Eddie Arslanian

Sent: Tue 8/10/2004 9:19 AM

To: 'David Young'

Cc: Bitu Tabatabai

Subject: Valley-Alhambra: Site History for NFA Form

Attachments:

[View As Web Page](#)

David, I received your voice message. Below, I have included a section on site history you can use for the closure form. It is an excerpt taken from our Interim Remedial Action Plan document dated April 30, 2001.

Can you please give us your timeframe for finalizing the forms? Thanks.

1.1 Site Description and History

The Site is located at 4900 East Valley Boulevard, Los Angeles, California in an industrial area of Los Angeles, California. North and south of the Site are manufacturing and distribution facilities, to the west is Valley Boulevard, and to the east are railroad tracks and industrial buildings.

From January 1972 to January 31, 1993, the Site was occupied by Harris Hub/Contract Metal Fabricators/Dresher, Inc. In 1990, Leggett and Platt purchased the business and continued the operation. Activities included receiving finished metal bed frames to be painted and assembled. As part of the painting process, two dip tanks and three USTs using paints was used (Figure 2). The three 750-gallon USTs were removed from the Site under the direction of the City of Los Angeles Fire Department (Fire Department). The subsurface investigations conducted during this time and subsequently are described in ENVIRON's Response to Request for Subsurface Site Assessment Work Plan dated April 30, 2001 (ENVIRON 2001c). Currently, the building is used as a warehouse for the storage of used garments by City Mission Industries, Inc. The warehouse operations since 1995 include sorting, pressing, bundling, and storage of the garments and various used furniture.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

Exhibit K

From: Eddie Arslanian

Sent: Tue 9/7/2004 9:04 AM

To: 'David Young'; 'Ju-Tseng Liu'

Cc: Bitu Tabatabai

Subject: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

From: Ju-Tseng Liu [jliu@rb4.swrcb.ca.gov]

Sent: Wed 9/8/2004 10:52 AM

To: Eddie Arslanian

Cc: David Young

Subject: Re: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

**** Reply Requested When Convenient ****

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/07/04 09:05 AM >>>

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

From: Eddie Arslanian

Sent: Wed 9/8/2004 11:08 AM

To: 'Ju-Tseng Liu'

Cc: 'David Young'; Bitu Tabatabai

Subject: RE: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

thanks

-----Original Message-----

From: Ju-Tseng Liu [<mailto:jliu@rb4.swrcb.ca.gov>]

Sent: Wednesday, September 08, 2004 10:53 AM

To: Eddie Arslanian

Cc: David Young

Subject: Re: Valley-Alhambra: NFA Form

**** Reply Requested When Convenient ****

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu

Senior Water Resources Control Engineer

Los Angeles Regional Water Quality Control Board

Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EArslanian@environcorp.com> 09/07/04 09:05 AM >>>

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.

ENVIRON International Corporation

707 Wilshire Boulevard, Suite 4950

Los Angeles, California 90017

Tel: 213.943.6326

Fax: 213.943.6301

Reply Reply to all Forward | X | Close | Help

From: Eddie Arslanian
To: 'Ju-Tseng Liu'
Cc: 'David Young'
Subject: RE: Valley-Alhambra: NFA Form
Attachments:

Sent: Fri 9/17/2004 4:00 PM

[View As Web Page](#)

JT and David, anything new on this front?

-----Original Message-----

From: Ju-Tseng Liu [mailto:jlju@rb4.swrcb.ca.gov]
Sent: Wednesday, September 08, 2004 10:53 AM
To: Eddie Arslanian
Cc: David Young
Subject: Re: Valley-Alhambra: NFA Form

**** Reply Requested When Convenient ****

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov
>>> "Eddie Arslanian" <EArslanian@environcorp.com> 09/07/04 09:05 AM >>>
Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

From: Eddie Arslanian

Sent: Tue 9/21/2004 9:57 AM

To: 'David Young'

Cc: 'Ju-Tseng Liu'; Bitu Tabatabai; George Linkletter

Subject: RE: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

Thank you.

-----Original Message-----

From: David Young [<mailto:dyoung@rb4.swrcb.ca.gov>]

Sent: Tuesday, September 21, 2004 9:56 AM

To: Eddie Arslanian

Cc: Ju-Tseng Liu

Subject: RE: Valley-Alhambra: NFA Form

Hi Eddie. I apologize for the delays, but the closure package will be given to JT this week. Thanks, Dave Young

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/17/04 04:00PM >>>
JT and David, anything new on this front?

-----Original Message-----

From: Ju-Tseng Liu [<mailto:jliu@rb4.swrcb.ca.gov>]

Sent: Wednesday, September 08, 2004 10:53 AM

To: Eddie Arslanian

Cc: David Young

Subject: Re: Valley-Alhambra: NFA Form

**** Reply Requested When Convenient ****

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/07/04 09:05 AM >>>

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

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Exhibit L

From: [Ju-Tseng Liu \[JLIU@rb4.swrcb.ca.gov\]](mailto:JLIU@rb4.swrcb.ca.gov)

Sent: Fri 10/1/2004 5:20 PM

To: [Eddie Arslanian](#)

Cc: [David Young](#)

Subject: RE: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

**** Reply Requested When Convenient ****

Hi Eddie:

I have completed my review of the closure packet and discuss the closure with the Remediation Section chief, Dr. Arthur Heath. Dr. Heath has asked us to check to see if this site is located within the San Gabriel Valley US EPA Superfund area. Please advise. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 10/01/04 03:32PM >>>
Hi guys, are we getting close on this?

-----Original Message-----

From: Ju-Tseng Liu [<mailto:jliu@rb4.swrcb.ca.gov>]
Sent: Wednesday, September 08, 2004 10:53 AM
To: Eddie Arslanian
Cc: David Young
Subject: Re: Valley-Alhambra: NFA Form

**** Reply Requested When Convenient ****

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)
(213) 576-6717 (fax)
E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/07/04 09:05 AM >>>
Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

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Exhibit M

From: Eddie Arslanian

Sent: Wed 10/6/2004 1:38 PM

To: 'Ju-Tseng Liu'

Cc: 'David Young'; George Linkletter; Bita Tabatabaj; Joan C. Donnellan (E-mail)'

Subject: RE: Valley-Alhambra: NFA Form

Attachments:

[View As Web Page](#)

Dear JT,

Per our discussion this morning, based on ENVIRON's research, the site is located outside the boundaries of the San Gabriel Valley US EPA Superfund Area.

With regard to the deed-restriction issue that you raised, we at ENVIRON do not recall having such a discussion with the Regional Board. Since this is a legal issue, I have notified Ms. Joan Donnellan, who is the outside counsel for Leggett & Platt. She will contact you to discuss the issue.

Thank you.

-----Original Message-----

From: Ju-Tseng Liu [<mailto:JLIU@rb4.swrcb.ca.gov>]

Sent: Friday, October 01, 2004 5:21 PM

To: Eddie Arslanian

Cc: David Young

Subject: RE: Valley-Alhambra: NFA Form

**** Reply Requested When Convenient ****

Hi Eddie:

I have completed my review of the closure packet and discuss the closure with the Remediation Section chief, Dr. Arthur Heath. Dr. Heath has asked us to check to see if this site is located within the San Gabriel Valley US EPA Superfund area. Please advise. Thanks. JT

J.T. Liu

Senior Water Resources Control Engineer

Los Angeles Regional Water Quality Control Board

Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EArslanian@environcorp.com> 10/01/04 03:32PM >>>

Hi guys, are we getting close on this?

-----Original Message-----

From: Ju-Tseng Liu [<mailto:jliu@rb4.swrcb.ca.gov>]

Sent: Wednesday, September 08, 2004 10:53 AM

To: Eddie Arslanian

Cc: David Young

Subject: Re: Valley-Alhambra: NFA Form

**** Reply Requested When Convenient ****

Hi Eddie:

I am away from my office today and will talk with Dave Young tomorrow. Thanks. JT

J.T. Liu
Senior Water Resources Control Engineer
Los Angeles Regional Water Quality Control Board
Site Cleanup Unit II

(213) 576-6667 (tel)

(213) 576-6717 (fax)

E-Mail: Jliu@rb4.swrcb.ca.gov

>>> "Eddie Arslanian" <EARslanian@environcorp.com> 09/07/04 09:05 AM >>>

Gentlemen,

Could you please provide us with a status update on this?

Thank you.

Eddie Arslanian, P.E.
ENVIRON International Corporation
707 Wilshire Boulevard, Suite 4950
Los Angeles, California 90017
Tel: 213.943.6326
Fax: 213.943.6301

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Exhibit N

ENVIRON

March 1, 2004

Mr. J.T. Liu, P.E.
Mr. David Young
California Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: Remediation Equipment Removal
4900 East Valley Boulevard, Valley-Alhambra Property
Los Angeles, California (SLIC No. 967)

Dear Messrs. Liu and Young:

ENVIRON International Corporation (ENVIRON) requests authorization from the California Regional Water Quality Control Board – Los Angeles Region (LARWQCB) to remove the remediation equipment from the property located at 4900 Valley Boulevard, Los Angeles, California (Site).

As agreed with the LARWQCB on November 18, 2003, ENVIRON performed confirmation soil sampling and final ground water sampling activities at the Site in December 2003 and January 2004. Based on the results of the soil and ground water samples, presented in ENVIRON's report dated February 3, 2004 and submitted to the LARWQCB, ENVIRON recommended that the LARWQCB issue a "No Further Action" designation for the Site.

It is ENVIRON's understanding that the LARWQCB has reviewed the results of the soil and ground water samples and is in agreement with ENVIRON's recommendation for "No Further Action" designation for the Site, pending submittal of the "Case Review Form." Therefore, ENVIRON requests authorization from the LARWQCB to remove the remediation equipment from the Site for the following reasons:

1. The current tenant of the Site is eager to remove the remediation equipment, as it has been a nuisance to its operations and taking up considerable space.
2. The responsible party for the Site continues to pay a monthly lease for the remediation equipment that has not been used for over 16 months, due to post-rebound monitoring and confirmation soil sampling activities.

Mr. J.T. Liu, P.E.
Mr. David Young

-2-

March 1, 2004

3. ENVIRON would like to transport the remediation equipment to another site to put into beneficial use.

ENVIRON will be submitting the "Case Review Form" to the LARWQCB shortly to finalize the closure procedures. If you have any questions regarding this letter, please call any of the undersigned.

Very truly yours,



George O. Linkletter, Ph.D., R.G. (No. 3728)
Principal



Bita Tabatabai, P.E. (No. C51294)
Manager

P:\Valley Alhambra\Regional Board Correspondence\letter re equipment removal 030104.doc

Copy: Mr. Robert Anderson, Leggett & Platt
Ms. Joan Donnellan, Leland, Parachini, Steinberg, Matzger & Melnick, LLP
Mr. Gary Herman, S.D. Herman Co., Inc.

EXHIBIT D

1 NORTHRUP SCHLUETER
A Professional Law Corporation
2 Linda L. Northrup, Esq. (SBN 102156)
31365 Oak Crest Drive, Suite 250
3 Westlake Village, California 91361
4 Tel (818) 707-2600
Fax (818) 707-2675



5 Attorneys for Interested Party
6 VALLEY-ALHAMBRA PROPERTIES,
a California general partnership

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STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

IN THE MATTER OF THE PETITION OF
LEGGETT AND PLATT, INC., FOR
REVIEW OF WATER CODE SECTION
13267 ORDER DATED JUNE 11, 2008 BY
THE CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD, LOS
ANGELES REGION

Petition No.
PARTIAL JOINDER OF VALLEY
ALHAMBRA PROPERTIES IN PETITION
FOR REVIEW PURSUANT TO WATER
CODE SECTION 13320 AND 23 C.C.R.
§2050 ET SEQ; DECLARATION OF GARY
J. HERMAN, SR. IN SUPPORT THEREOF

I. INTRODUCTION

Valley-Alhambra Properties ("Valley Alhambra") is a partnership which is the owner of real property located at 4900 Valley Boulevard, Los Angeles, California ("Site"). Valley Alhambra is a party interested in the proceedings initiated by the Regional Water Quality Control Board ("Regional Board") which resulted in the issuance of an order pursuant to Water Code Section 13267 on June 11, 2008 ("June 11 Order") directed to Leggett and Platt, Inc., the successor in interest to Valley Alhambra's former tenant on the Site. The Valley Alhambra partnership has always consisted of a group of elderly owners, several of whom have passed away during the lengthy time that this remediation process has been pending. As set forth in detail in the accompanying Declaration of Gary Herman, Sr., one of the remaining partners of Valley Alhambra, this process has been ongoing for well over 10 years and has had a significant negative impact on the use and financing of the property, has detrimentally impacted its rental value and has precluded any sale of the property for a full fair market value.

1 During the period since Leggett and Platt ceased its operations on the property, the Site has
2 been rented to a succession of warehousing tenants. There have been no manufacturing operations at
3 the property during that period nor occupation by any tenant whose use would have involved any risk
4 of discharge of contaminants or have contributed in any way to any pre-existing hazardous
5 conditions on the Site. Declaration of Gary Herman, Sr., paragraph 3.

6 **II. NAME AND ADDRESS OF PARTY IN INTEREST**

7 All correspondence and written communications regarding this matter should be directed to:

8 Gary J. Herman, Sr.
9 1201 S. Olive Street
10 Los Angeles, California 90015
11 Telephone: 213-747-6531, Ext. 114
12 Facsimile: 213-747-4305
13 garysr@sdherman.com

14 With a copy to:

15 Linda L. Northrup, Esq., Counsel for Valley Alhambra Properties
16 Northrup Schlueter, A Professional Law Corporation
17 31365 Oak Crest Drive, Suite 250
18 Westlake Village, California 91361
19 Telephone: 818-707-2600
20 Facsimile: 818-707-2675
21 lnorthrup@nsplc.com

22 **III. SPECIFIC ACTION OF THE REGIONAL WATER BOARD FOR WHICH STATE
23 WATER BOARD REVIEW IS REQUESTED**

24 Valley Alhambra joins in the request of Leggett and Platt for review of the Section 13267
25 Order issued by the Regional Water Board on June 11, 2008 ("June 11 Order") to the extent set forth
26 herein and incorporates by reference the copy of the order attached to the Petition of Leggett and
27 Platt as Exhibit A.

28 **IV. DATE OF THE REGIONAL WATER BOARD ACTION**

June 11, 2008.

**V. STATEMENT OF REASONS WHY THE REGIONAL WATER BOARD'S ACTION
WAS INAPPROPRIATE OR IMPROPER**

Valley Alhambra partially joins in the Petition of Leggett and Platt for the reasons set forth
below:

1 1. Investigation, remediation, and confirmation monitoring activities, as well as the data
2 derived from these activities, evidence that current conditions of the soil and ground water at the Site
3 do not pose a substantial risk to human health or the waters of the State;

4 2. Given the extensive work performed at the Site over the last 10 years, characterization
5 of the Site is sufficient to understand the pre- and post-remedial conditions at the Site;

6 3. The burden, including costs of compliance, imposed by the Order does not bear a
7 reasonable relationship to the benefits that may be obtained from the reports and investigations
8 sought by the Order;

9 4. Investigation, remediation, and confirmation monitoring to date justifies closure of
10 the Site without further investigation.

11 Valley Alhambra joins in the request of Leggett and Platt that the Petition be held in
12 abeyance for the maximum period and reserves its right to supplement its submission if the Petition
13 is reactivated.

14 However, to the extent that any portion of the Leggett & Platt Petition is based on an
15 argument that Leggett and Platt is not a proper party or subject to the jurisdiction of the Water Board
16 with respect to this Site and orders relating thereto, Valley Alhambra expressly declines to join in
17 those portions of the Petition and opposes any such relief sought by Leggett and Platt in connection
18 therewith and reserves the right to supplement its submission with additional authorities and
19 evidence should any hearing be held thereon.

20
21 **IV. STATEMENT OF GRIEVANCE OF INTERESTED PARTY**

22 Valley Alhambra is aggrieved by the Order because: (1) Closure should have been issued
23 when requested by Valley Alhambra on terms which had been approved by the Regional Water
24 Board in January 2007; and (2) the June 11 Order imposes an excessive and continuing unnecessary
25 financial burden on Valley Alhambra as the owner of the Site. See Declaration of Gary J. Herman,
26 Sr. submitted herewith.

1 **VII. SPECIFIC ACTION THAT INTERESTED PARTY REQUESTS THE STATE**
2 **BOARD TO TAKE**

3 Valley Alhambra requests that the June 11 Order be rescinded in its entirety on the grounds
4 that it is beyond the scope of investigation necessary to characterize the Site for closure. The State
5 Water Board should direct the Regional Water Board to issue a closure letter for the Site.

6 Valley Alhambra joins Petitioner's request that the State Water Board hold this Petition in
7 abeyance for the maximum time period or until reactivated. Valley Alhambra reserves the right to
8 amend its submission and to request further action if the Petition is reactivated.

9
10 To the extent that any portion of the Leggett & Platt Petition requests that the Order be
11 rescinded only as to Leggett and Platt, that Valley Alhambra be joined or that there be a finding that
12 Leggett and Platt is not a proper party subject to the June 11 Order or subject to the jurisdiction of
13 the Water Board or Regional Water Board with respect to this Site and orders relating thereto, Valley
14 Alhambra expressly declines to join in those portions of the Petition and opposes any such relief
15 sought by Leggett and Platt in connection therewith and reserves the right to supplement its
16 submission with additional authorities and evidence should any hearing be held thereon.

17 **VIII. PARTIAL JOINDER IN POINTS AND AUTHORITIES SUBMITTED BY**
18 **PETITIONER LEGGETT AND PLATT**

19 Valley Alhambra joins and incorporates herein by reference the arguments and authorities
20 contained in the Petition of Leggett and Platt in Section VIII., Parts A. (Applicable Standard of
21 Review), C. (Data from Ground Water Sampling Reports ...Show that the Current condition of the
22 Soil and Groundwater Does not Pose a Substantial Risk, etc.), D. (The Regional Water Board Has
23 Not Provided Prima Facie Evidence to Show a Change in Conditions Since it Ordered the
24 Remediation Equipment Removed and Stated the Site was Eligible for Closure, Subject to
25 Restrictive Covenants), and E. (The Cost Associated with the Investigation Required by the Order
26 Has No Reasonable Relationship to the Nominal Threat, etc.).

1 A. **FAILURE TO ISSUE CLOSURE WILL RESULT IN SERIOUS FINANCIAL**
2 **HARDSHIP TO VALLEY ALHAMBRA PROPERTIES DUE TO**
3 **REDUCTION IN INCOME AND INABILITY TO FINANCE OR SELL ITS**
4 **PROPERTY FOR FULL AND FAIR MARKET VALUE**

5 Valley Alhambra is a partnership made up of a group of elderly property owners who have
6 never themselves occupied or operated any business on the Site. Valley Alhambra has already
7 suffered significant financial hardship in connection with the lengthy period that this Site has been
8 subject to investigation and remediation, now for over ten (10) years. During that entire period,
9 Valley Alhambra has been prevented from selling its property for a fair commercial price due to the
10 great uncertainty created for any purchaser due to the open investigation underway by regulatory
11 agencies. This situation has also negatively impacted the rental income which may be generated by
12 the property due to the reluctance of substantial commercial tenants to allow their businesses to
13 operate on a property that is subject to an open environmental investigative proceeding. The details
14 of this past and present hardships are set forth in the Declaration of Gary Herman, a commercial real
15 estate agent and property manager with over fifty years of experience dealing with these types of
16 properties which is submitted herewith. Several of the owners have passed away during the lengthy
17 period of the investigation and remediation process thus far and the remainder are elderly and some
18 rely on the income from this property for full time nursing care. See Declaration of Gary Herman.

19 Given the significant and thorough investigation and remediation already conducted at the
20 Site and the assessment of risks completed showing that future risks to public health and safety are
21 insignificant, as outlined in detail in the Petition of Leggett and Platt and the Declaration of George
22 Linkletter which is referred to and incorporated herein by reference, there is no justification for the
23 June 11 Order which will substantially increase the financial hardship and uncertainty to the Valley
24 Alhambra partners (who have never themselves occupied or operated businesses on the Site) for
25 what are, at best, negligible additional benefits to the public health and safety.
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IX. STATEMENT OF SERVICE ON REGIONAL WATER BOARD

A copy of this partial joinder has been sent to the Regional Water Board.

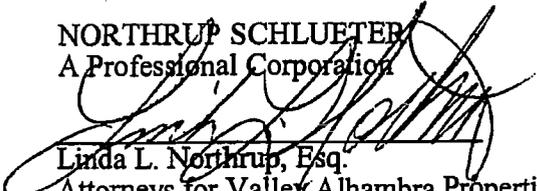
X. JOINDER IN REQUEST FOR PREPARATION OF RECORD, FOR EVIDENTIARY HEARING AND FOR STAY

Valley Alhambra joins in the request of Leggett and Platt for the preparation of the record in this matter by the Regional Water Board, for a Stay of the June 11 Order and for an evidentiary hearing on the matters raised in the Petition for the reasons and based on the authority stated therein to the extent joined by Valley Alhambra herein.

XI. CONCLUSION

Based on the fact that this Site has been subject to a full and complete investigation and remediation and was approved for closure by the Regional Water Board and that no new information or conditions warrant reopening of the Site and that the great financial burdens imposed by the June 11 Order far outweigh the potential benefits, if any, from the new work required thereunder, Valley Alhambra joins in the requests for relief, including a stay and evidentiary hearing, set forth in the Petition of Leggett and Platt, Inc. and incorporates the facts and legal authorities set forth therein to the extent and on the grounds set forth herein.

Dated: July 10, 2008

NORTHROP SCHLUETER
A Professional Corporation

Linda L. Northrup, Esq.
Attorneys for Valley Alhambra Properties

1 DECLARATION OF GARY HERMAN, SR.

2 I, Gary J. Herman, Sr. declare as follows:

3 1. I am 77 years old and am one of the remaining partners (with my 76 year old wife,
4 Beverly) of Valley Alhambra Properties, a partnership which is the owner of real property located at
5 4900 Valley Boulevard, Los Angeles, California ("Site"). I have been a commercial real estate
6 broker and property manager for over fifty years and have been extensively involved in the
7 management, leasing, financing and sale of commercial and industrial properties similar to the Site at
8 issue. I have personal knowledge of the facts set forth herein and could and would competently
9 testify thereto under oath.

10 2. In 1993 when contamination was first identified at the Site, the partners in the
11 property included Ruth Shelby and Barney and Dorothy Weingard. In 2003 at the age of 90, Ruth
12 Shelby passed away. Her interest in the property is currently held by her son, Charles Shelby, a
13 Catholic priest who resides in Illinois. Earlier this year, at the age of 90, Barney Weingard passed
14 away. Although his wife, Dorothy, is a remaining partner, she suffers from severe Alzheimer's
15 disease, was not even able to attend her husband's funeral, and depends on the income from this
16 property to fund her required full time nursing care. My wife and I suffer from numerous age related
17 health conditions. I recently had serious colon surgery and my wife was recently diagnosed with an
18 inoperable aneurysm and faces additional surgery in the coming months.

19 3. I have been the person primarily responsible for managing the Site for the Valley
20 Alhambra partnership. After Leggett & Platt shut down its facility, the property was vacant until
21 August 1995. Since then, the following tenants have occupied the Site for the various businesses
22 described below, none of which involve manufacturing or use of solvents or chemicals to the best of
23 my knowledge and belief. I have visited the Site numerous times while these tenants have been in
24 occupancy and have seen nothing on the Site inconsistent with the type of business authorized to be
25 conducted under their respective leases as set forth below:

26	1995 - 1999	Apak International	Warehousing of used clothing
27	1999 - 2002	Los Angeles City Mission	Warehousing of used clothing
28	2002 - 2003	A-1 Clothing	Warehousing of used clothing

(PROOF OF SERVICE)

STATE OF CALIFORNIA |
|ss.
COUNTY OF LOS ANGELES |

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within proceeding; my business address is 31365 Oak Crest Drive, Suite 250, Westlake Village, California 91361.

On July 10, 2008, I served the following document(s) described as **PARTIAL JOINDER OF VALLEY ALHAMBRA PROPERTIES IN PETITION FOR REVIEW PURSUANT TO WATER CODE § 13320 AND 23 C.C.R. §2050; DECLARATION OF GARY J. HERMAN, SR. IN SUPPORT THEREOF** on the interested parties in this proceeding by facsimile to the numbers listed below and by placing true and correct copies thereof in a sealed envelope addressed as follows:

Mr. David Young Regional Water Quality Control Board 320 West Fourth St. Suite 200 Los Angeles, California Facsimile No. 213-576-6640	State Water Resources Control Board Office of Chief Counsel Jeannette L. Bashaw 1001 I Street 22 nd Floor Sacramento, California Facsimile No. 916-341-5199
Joan C. Donnellan, Esq. Parker, Milliken, Clark, O'Hara & Samuelian 555 So. Flower Street, 30 th Floor Los Angeles, California 90071 Facsimile No. 213-683-6669 Counsel for Leggett and Platt, Inc.	

BY EXPRESS SERVICE CARRIER

I deposited in a box or other facility regularly maintained by the express service carrier in an envelope or package designated by the express service carrier with delivery fees paid or provided for, addressed to the person on whom it is to be served.

Executed on July 10, 2008, at Los Angeles, California.

STATE — I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

FEDERAL — I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

LINDA L. NORTHRUP

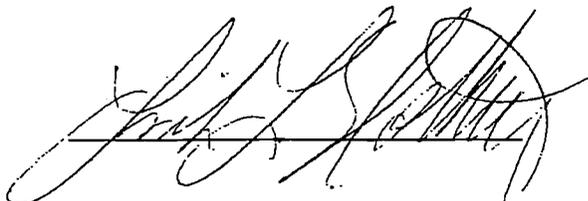


EXHIBIT E

PARKER MILLIKEN

PARKER, MILLIKEN, CLARK, O'HARA, SAMUELIAN
A PROFESSIONAL CORPORATION

JOAN C. DONNELLAN

Direct Dial: (213) 683-6638
E-mail: JDONNELLAN@PMCOS.COM

November 17, 2008

VIA HAND DELIVERY

Attn: David Bacharowski
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: Request For Reconsideration re: Section 13267 Order
4900 Valley Alhambra Blvd Site (SLIC No 0967, Site ID 204DJ00)

Dear Mr. Bacharowski:

On June 11, 2008, the California Regional Water Quality Control Board, Los Angeles Region ("Regional Water Board") issued a Section 13267 Order ("Order") relating to above-referenced site. In response to the Order, Leggett & Platt Incorporated ("Leggett & Platt") filed a Petition with the State Water Resources Control Board pursuant to Water Code Section 13320 for review of the Order as well as a Request for Reconsideration concurrently filed with the Regional Water Board.

The State Water Resources Control Board issued an Order holding the Petition in Abeyance pending negotiations with the Regional Water Board. On October 14, 2008, Leggett & Platt, represented by Parker Milliken; Valley Alhambra Properties, represented by Linda Northrup; and the parties' consultant ENVIRON, represented by Dr. George Linkletter and Eddy Arslanian meet with you, Su Han, David Young, and Arthur Heath to discuss the Declaration of Dr. Linkletter in support of the Petition and the Request for Reconsideration.

After an extensive discussion, you agreed to approve a proposal for a soil gas investigation of the site located at 4900 Valley Boulevard ("On-Site Investigation") and an offsite groundwater investigation on the adjacent property ("Off-Site Investigation") now owned by Mirror Image, Inc. ("Mirror Image, Inc. Site").

4009-700 (337830)

ATTORNEYS AT LAW
THIRTIETH FLOOR
555 SO. FLOWER STREET · LOS ANGELES, CA 90071-2440
(213) 683-6500 · FAX (213) 683-6669
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PARKER MILLIKEN

ATTORNEYS AT LAW

Mr. David Bacharowski
California Regional Water Quality Control Board
November 17, 2008
Page 2

Submitted with this letter is the proposal for both an On-site Investigation and Off-site Investigation prepared by Environ in response to the October 14, 2008 meeting. ("ENVIRON Proposal").

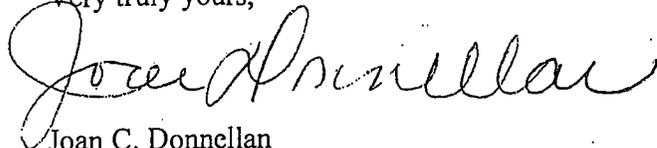
Given the extraordinary delays acknowledged by the Regional Water Board, this letter confirms that the Regional Water Board agreed to give priority to the approval of the ENVIRON Proposal, the evaluation of the results of the investigation set forth in the ENVIRON Proposal and issuance of a No Further Action designation for the Site. We also understand that the Regional Water Board is willing to issue a No Further Action designation as to the soils issues separately if evidence presented supports such issuance.

Valley Alhambra will coordinate with ENVIRON to seek access to the Mirror Image Site to conduct the Offsite Investigation consistent with the ENVIRON Proposal. In the event that Mirror Image, Inc. refuses sufficient access to conduct the Offsite Investigation, the Regional Water Board agreed to take immediate legal or administrative action against Mirror Image, Inc. ordering Mirror Image, Inc. to conduct or cooperate with ENVIRON to conduct the Offsite Investigation.

The ENVIRON Proposal, any documentation, reports or information submitted in connection with the ENVIRON Proposal and any investigation or remediation activities do not constitute an admission of liability by Leggett & Platt or Valley Alhambra or a waiver of Leggett & Platt's or Valley Alhambra's objections to the Order as set forth in Leggett & Platt's Petition or Valley Alhambra's joinder to the Petition, the Request for Reconsideration, or Parker Milliken's letter submitted to the Regional Water Board on July 10, 2008. Further, neither this letter nor the submission of the enclosed ENVIRON Proposal should be interpreted as a waiver of Leggett & Platt's or Valley Alhambra's right to reinstate the Petition, which is currently held in abeyance by the State Water Resources Control Board.

ENVIRON is prepared to commence testing within two weeks of approval the ENVIRON proposal. We request your response no later than November 25, 2008.

Very truly yours,



Joan C. Donnellan
PARKER, MILLIKEN, CLARK,
O'HARA & SAMUELIAN

JCD/da
Enclosures

PARKER MILLIKEN

ATTORNEYS AT LAW

Mr. David Bacharowski
California Regional Water Quality Control Board
November 17, 2008
Page 3

cc: Ms. Jennifer Fordyce – Via Federal Express
Mr. Art Heath- Via Hand Delivery
Mr. David Young – Via Hand Delivery
Ms. Su Han – Via Hand Delivery
Ms. Linda Northrup – Via Federal Express
Mr. Gordon Billheimer – Via U.S. Mail
Mr. Eddie Arslanian – Via U.S. Mail w/o Enclosures
Mr. George Linkletter – Via U.S. Mail w/o Enclosures

EXHIBIT F



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Office of Chief Counsel

1001 I Street, 22nd Floor, Sacramento, California 95814
P.O. Box 100, Sacramento, California 95812-0100
(916) 341-5161 ♦ FAX (916) 341-5199 ♦ <http://www.waterboards.ca.gov>



Arnold Schwarzenegger
Governor

July 14, 2008

FILE

Joan C. Donnellan, Esq.
Parker, Milliken, Clark, O'Hara & Samuelian
555 S. Flower Street, 30th Floor
Los Angeles, CA 90071-2440
jdonnellan@pmcos.com

Dear Ms. Donnellan:

PETITION OF LEGGETT & PLANT, INCORPORATED (WATER CODE SECTION 13267
LETTER DATED JUNE 11, 2008, REQUIRING SUBMITTAL OF A WORK PLAN FOR 4900
VALLEY BOULEVARD, LOS ANGELES, LOS ANGELES COUNTY), LOS ANGELES WATER
BOARD: ACKNOWLEDGMENT OF PETITION RECEIVED AND APPROVAL OF REQUEST
TO BE HELD IN ABÉYANCE
SWRCB/OCC FILE A-1936

This will acknowledge receipt of the above petition on July 10, 2008. You have asked that the State Water Resources Control Board (State Water Board) hold the matter in abeyance for an unspecified period of time. We are happy to do so in hopes that the matter may be worked out between you and the Regional Water Quality Control Board (Regional Water Board). We will hold the matter in abeyance for two years from the date the petition was filed. If, by that time, no resolution of the matter has taken place or the matter has not become the subject of an active dispute, you may either request that the abeyance period be extend for another two-year period, or the petition will be dismissed.

If you have any questions, please call me at (916) 341-5175.

**IN ALL FUTURE CORRESPONDENCE, PLEASE REFER TO
SWRCB/OCC FILE A-1936**

Sincerely,


Elizabeth Miller Jennings
Staff Counsel IV

cc: See next page

California Environmental Protection Agency



cc: Mr. Robert Anderson
Leggett & Platt, Incorporated
Number 1 Leggett Road
P.O. Box 757
Carthage, MO 64836-0757

Linda L. Northrup, Esq.
Northrup Schlueter
31365 Oak Crest Drive, Suite 250
Westlake Village, CA 91361
lnorthrup@nsplc.com

Mr. Gary J. Herman, Sr.
1201 S. Olive Street
Los Angeles, CA 90015
garysr@sdherman.com

Ms. Tracy Egoscue **[via email only]**
Executive Officer
Los Angeles Regional Water Quality
Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Mr. David Bacharowski **[via email only]**
Assistant Executive Officer
Los Angeles Regional Water Quality
Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Ms. Deborah Smith **[via email only]**
Assistant Executive Officer
Los Angeles Regional Water Quality
Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Mr. David Young **[via email only]**
Engineering Geologist
Los Angeles Regional Water Quality
Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Michael J. Levy, Esq. **[via email only]**
Office of Chief Counsel
State Water Resources Control Board
1001 I Street, 22nd Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

Jennifer L. Fordyce, Esq. **[via email only]**
Office of Chief Counsel
State Water Resources Control Board
1001 I Street, 22nd Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

Jeffery M. Ogata, Esq. **[via email only]**
Office of Chief Counsel
State Water Resources Control Board
1001 I Street, 22nd Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

Elizabeth Miller Jennings, Esq. **[via email only]**
Office of Chief Counsel
State Water Resources Control Board
1001 I Street, 22nd Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Office of Chief Counsel

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Arnold Schwarzenegger
Governor

July 14, 2008

FILE

Linda L. Northrup, Esq.
Northrup Schlueter
31365 Oak Crest Drive, Suite 250
Westlake Village, CA 91361
lnorthrup@nsplc.com

Dear Ms. Northrup:

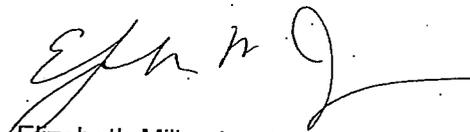
PETITION OF VALLEY-ALHAMBRA PROPERTIES (WATER CODE SECTION 13267 LETTER DATED JUNE 11, 2008, REQUIRING SUBMITTAL OF A WORK PLAN FOR 4900 VALLEY BOULEVARD, LOS ANGELES, LOS ANGELES COUNTY), LOS ANGELES WATER BOARD: ACKNOWLEDGMENT OF PETITION RECEIVED AND APPROVAL OF REQUEST TO BE HELD IN ABEYANCE
SWRCB/OCC FILE A-1936(a)

This will acknowledge receipt of the above petition on July 10, 2008. You have asked that the State Water Resources Control Board (State Water Board) hold the matter in abeyance for an unspecified period of time. We are happy to do so in hopes that the matter may be worked out between you and the Regional Water Quality Control Board (Regional Water Board). We will hold the matter in abeyance for two years from the date the petition was filed. If, by that time, no resolution of the matter has taken place or the matter has not become the subject of an active dispute, you may either request that the abeyance period be extend for another two-year period, or the petition will be dismissed.

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**IN ALL FUTURE CORRESPONDENCE, PLEASE REFER TO
SWRCB/OCC FILE A-1936(a)**

Sincerely,


Elizabeth Miller Jennings
Staff Counsel IV

cc: See next page

California Environmental Protection Agency

 Recycled Paper

Linda L. Northrup, Esq.

- 2 -

July 14, 2008

cc: Mr. Gary J. Herman, Sr.
1201 S. Olive Street
Los Angeles, CA 90015
garysr@sdherman.com

Joan C. Donnellan, Esq.
Parker, Milliken, Clark,
O'Hara & Samuelian
555 S. Flower Street, 30th Floor
Los Angeles, CA 90071-2440
jdonnellan@pmcos.com

Mr. Robert Anderson
Leggett & Platt, Incorporated
Number 1 Leggett Road
P.O. Box 757
Carthage, MO 64836-0757

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California Environmental Protection Agency



EXHIBIT G

PARKER MILLIKEN

PARKER, MILLIKEN, CLARK, O'HARA, SAMUELIAN
A PROFESSIONAL CORPORATION

JOAN C. DONNELLAN

Direct Dial: (213) 683-6638
E-mail: JDONNELLAN@PMCOS.COM

November 17, 2008

VIA HAND DELIVERY

Attn: David Bacharowski
CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
320 West Fourth Street, Suite 200
Los Angeles, California 90013

Re: Request For Reconsideration re: Section 13267 Order
4900 Valley Alhambra Blvd Site (SLIC No 0967, Site ID 204DJ00)

Dear Mr. Bacharowski:

On June 11, 2008, the California Regional Water Quality Control Board, Los Angeles Region ("Regional Water Board") issued a Section 13267 Order ("Order") relating to above-referenced site. In response to the Order, Leggett & Platt Incorporated ("Leggett & Platt") filed a Petition with the State Water Resources Control Board pursuant to Water Code Section 13320 for review of the Order as well as a Request for Reconsideration concurrently filed with the Regional Water Board.

The State Water Resources Control Board issued an Order holding the Petition in Abeyance pending negotiations with the Regional Water Board. On October 14, 2008, Leggett & Platt, represented by Parker Milliken; Valley Alhambra Properties, represented by Linda Northrup; and the parties' consultant ENVIRON, represented by Dr. George Linkletter and Eddy Arslanian meet with you, Su Han, David Young, and Arthur Heath to discuss the Declaration of Dr. Linkletter in support of the Petition and the Request for Reconsideration.

After an extensive discussion, you agreed to approve a proposal for a soil gas investigation of the site located at 4900 Valley Boulevard ("On-Site Investigation") and an offsite groundwater investigation on the adjacent property ("Off-Site Investigation") now owned by Mirror Image, Inc. ("Mirror Image, Inc. Site").

4009-700 (337830)

ATTORNEYS AT LAW
THIRTIETH FLOOR
555 SO. FLOWER STREET · LOS ANGELES, CA 90071-2440
(213) 683-6500 · FAX (213) 683-6669
WWW.PMCOS.COM

PARKER MILLIKEN

ATTORNEYS AT LAW

Mr. David Bacharowski
California Regional Water Quality Control Board
November 17, 2008
Page 2

Submitted with this letter is the proposal for both an On-site Investigation and Off-site Investigation prepared by Environ in response to the October 14, 2008 meeting. ("ENVIRON Proposal").

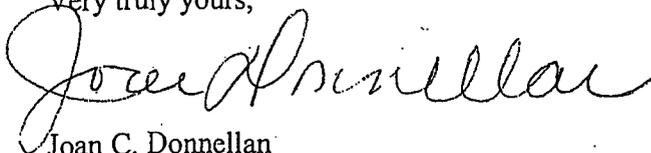
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The ENVIRON Proposal, any documentation, reports or information submitted in connection with the ENVIRON Proposal and any investigation or remediation activities do not constitute an admission of liability by Leggett & Platt or Valley Alhambra or a waiver of Leggett & Platt's or Valley Alhambra's objections to the Order as set forth in Leggett & Platt's Petition or Valley Alhambra's joinder to the Petition, the Request for Reconsideration, or Parker Milliken's letter submitted to the Regional Water Board on July 10, 2008. Further, neither this letter nor the submission of the enclosed ENVIRON Proposal should be interpreted as a waiver of Leggett & Platt's or Valley Alhambra's right to reinstate the Petition, which is currently held in abeyance by the State Water Resources Control Board.

ENVIRON is prepared to commence testing within two weeks of approval the ENVIRON proposal. We request your response no later than November 25, 2008.

Very truly yours,



Joan C. Donnellan
PARKER, MILLIKEN, CLARK,
O'HARA & SAMUELIAN

JCD/da
Enclosures

PARKER MILLIKEN

ATTORNEYS AT LAW

Mr. David Bacharowski
California Regional Water Quality Control Board
November 17, 2008
Page 3

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Ms. Linda Northrup – Via Federal Express
Mr. Gordon Billheimer – Via U.S. Mail
Mr. Eddie Arslanian – Via U.S. Mail w/o Enclosures
Mr. George Linkletter – Via U.S. Mail w/o Enclosures

ENVIRON

November 14, 2008

David Young
California Regional Water Quality Control Board
Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, California 90013

**Re: Work Plan for Additional Investigations
Valley Alhambra Property (SLIC No. 967)
4900 East Valley Boulevard
Los Angeles, California**

Dear Mr. Young:

ENVIRON International Corporation (ENVIRON) submits this work plan to the California Regional Water Quality Control Board – Los Angeles Region (LARWQCB) to perform additional environmental investigations at the Valley Alhambra Property, 4900 East Valley Boulevard, California (the "Site", see Figures 1 and 2). ENVIRON has been retained to prepare and implement this work plan.

On June 11, 2008, the LARWQCB issued an Order requiring additional investigation including soil gas testing at the Site and the vertical and lateral delineation of the chlorinated volatile organic compounds (VOCs) in ground water among other requirements. Leggett & Platt Incorporated filed a Petition and Request for Reconsideration with both the State Water Resources Control Board and the LARWQCB requesting the issuance of a No Further Action (NFA) status. Valley Alhambra Properties filed a Partial Joinder in that Petition.

Representatives of Valley Alhambra and L&P, accompanied by ENVIRON, and representatives of the LARWQCB (including David Bacharowski) met on October 14, 2008 to discuss the issues raised by the Petition and Request for Reconsideration as discussed at length by Dr. Linkletter. David Bacharowski advised the parties that the LARWQCB wanted a soil gas study of the Site and would issue a No Further Action designation for the soil if the soil gas study supported the conclusion that potential VOC vapor intrusion risk at the Site would be within the acceptable risk management range consistent with unrestricted and/or commercial/industrial land use. Mr. Bacharowski further advised the parties that LARWQCB wanted to receive a work plan for investigation of the off-site location (formerly referred to as the Corradini property and now owned by Mirror Image, Inc.) to delineate the migration of chlorinated VOCs, if any, from the Site to the off-site location; the issuance of an NFA designation for the ground water at the Site will depend on the results of the off-site investigation.

OBJECTIVE

The objectives of the additional investigations presented in this work plan are to satisfy the requirements in the Order as limited by the LARWQCB at the October 14th meeting and to obtain an NFA designation for the Site.

- The objective of a post-remediation soil gas survey is to collect data that will be used to evaluate potential volatile organic compound (VOC) vapor intrusion at the site, as requested by the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment in its letter dated April 17, 2006.

- The objective of the off-site ground water investigation is to evaluate if the chlorinated VOCs from the Site migrated at actionable levels in the off-site ground water to the southwest and west of the Site, on the property located at 4876 and 4880 Valley Boulevard (formerly referred to as the Corradini property and now owned by Mirror Image, Inc.). Ground water data collected from prior monitoring events, both prior to and after implementation of soil and ground water remedial activities, have demonstrated that chlorinated VOCs have been functionally delineated in the northerly, easterly, and southerly directions outside the source area and no additional delineation will be necessary in that regard at this time.

SCOPE OF WORK

All activities proposed in this work plan will be conducted under the direct supervision of a California-registered Professional Engineer (Civil) and/or Professional Geologist. To implement the work plan, ENVIRON will undertake four tasks, as described below:

Task 1: Pre-Field Activities

As part of this task, ENVIRON will notify Underground Service Alert (USA) Dig Alert regarding the proposed boring locations and coordinate with its subcontractors (e.g., utility locator, concrete corer, driller, and analytical laboratory). In addition to the services provided by USA Dig Alert, ENVIRON will retain a private utility locator to conduct a geophysical survey to mark subsurface utility lines and potential obstructions.

ENVIRON will obtain permits for the ground water borings from the Los Angeles County Department of Health Services and the necessary site access agreement from the property located at 4876 and 4880 Valley Boulevard. ENVIRON will also update its previously prepared site-specific Health and Safety Plan (HASP) to perform the field tasks. The HASP is designed to minimize exposure of ENVIRON field personnel to potentially hazardous materials.

Task 2: On-Site Soil Gas Survey

Soil gas sampling will be performed at 10 locations within the relatively small footprint of the former VOC remediation area (less than 5,000 square feet) at the site. The approximate locations of the proposed soil gas borings are shown on Figure 3. Concrete will be cored where necessary. The soil gas contractor will advance the soil borings with a direct push-type rig, thereby reducing drilling residuals. Soil gas samples will be collected with pre-cleaned syringes from a depth of approximately 5 feet below ground surface (bgs) at each location. Since ground water has been historically been measured at a depth of approximately 10 to 14 feet at the site, deeper soil gas samples will not be collected.

Soil gas samples will be analyzed in a California state-certified on-site mobile laboratory for VOCs by United States Environmental Protection Agency (USEPA) Method 8260B or equivalent. The soil gas survey will conform to the joint Department of Toxic Substances Control and LARWQCB soil survey advisory dated January 28, 2003. The reporting limits for VOCs in soil gas will be below the California Human Health Screening Levels (CHHSL) commercial/industrial use scenario thresholds.

Prior to advancing the initial soil gas boring and between mobilizing to successive locations, the direct push equipment will be decontaminated to minimize the potential for cross-contamination. Decontamination water will be placed in Department of Transportation (DOT) – approved 55-gallon drums, appropriately labeled, and marked for subsequent disposal.

Task 3: Off-Site Ground Water Sampling

ENVIRON proposes to collect grab ground water samples from five locations on the property located at 4876 and 4880 Valley Boulevard, located to the adjacent southwest and west of the site (see Figures 4a¹ and 4b) to address the LARWQCB's desire to determine if chlorinated VOCs in ground water have migrated from the Site to the off-site location (Corradini/Mirror Image property) at actionable levels. Borings will be advanced using a direct push drilling system in conjunction with a truck-mounted or track-mounted limited access rig. The borings will be hand augered to a depth of approximately 5 feet prior to drilling. Borings are expected to advance to depths of approximately three feet past first water, which is anticipated at approximately 10 to 14 feet bgs based on previous water depth measurements. One grab ground water sample will be collected from each boring by either HydroPunch[®] or the installation of temporary wells, as appropriate. These ground water samples will be collected according to the procedures outlined in Grab Ground Water Sampling Protocol, which is included as Appendix A.

Ground water samples will be collected in 40-milliliter (ml) volatile organic analysis (VOA) vials preserved with hydrochloric acid, labeled, and placed in a cooler with ice pending shipment to a stationary California State-certified laboratory at the completion of each day of fieldwork. Ground water samples will be analyzed for VOCs by USEPA Method 8260B on a 5 to 7 business days turnaround basis. For QC purposes, ENVIRON will collect duplicate, equipment, and trip blank samples, as needed, for each day of field work.

Following the ground water sampling activities, the borings will be backfilled with bentonite grout and patched with asphalt or concrete on the surface to match the existing ground surface. Soil cuttings and wastewater will be placed in 55-gallon drums and brought back to the site for subsequent disposal.

Task 4: Data Evaluation and Report Preparation

Upon completion of field activities, the soil gas and ground water data will be evaluated and incorporated into a report with appropriate conclusions and recommendations for next steps. The soil gas data will be compared to CHHSLs and, if necessary, a vapor intrusion evaluation will be completed to further evaluate potential vapor intrusion at the site. The ground water data will be evaluated along with the prior ground water monitoring data collected from the site.

Depending on the schedule for the sampling activities, it may be logical to prepare separate reports for the on-site soil gas survey and off-site ground water investigations. The report(s) will be submitted to the RWQCB for and electronically uploaded to the State's Spills, Leaks, and Investigations Cleanup (SLIC) Program database per the LARWQCB's requirements.

WORK PLAN SCHEDULE

Upon receipt of the LARWQCB's approval to proceed with the Work Plan, ENVIRON can conduct the tasks described above in the tentative schedule listed below:

Task Description	Schedule
Task 1 – Pre-field Activities	1 to 2 weeks, contingent on the driller's availability
Task 2 – On-Site Soil Gas Survey	1 day of field work 4 days for laboratory analyses

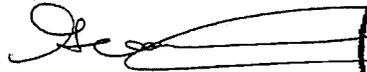
¹ Figures 4a and 4b are the same except Figure 4a depicts the aerial backdrop.

Task Description	Schedule
Task 3 – Off-Site Ground Water Sampling	1 to 2 days of field work 2 weeks for laboratory analyses
Task 4 – Data Evaluation and Report Preparation	4 weeks upon receipt of analytical data

CLOSING

Upon receipt of the LARWQCB's written approval of the work plan, ENVIRON can begin its implementation. If you have any questions, please call George Linkletter at 949.798.3601 or Eddie Arslanian at 213.943.6326.

Very truly yours,



George O. Linkletter, PhD, PG
Senior Vice President and Principal



Eddie Arslanian, PE
Senior Manager



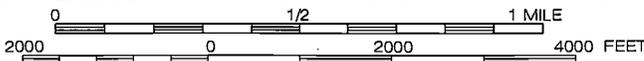
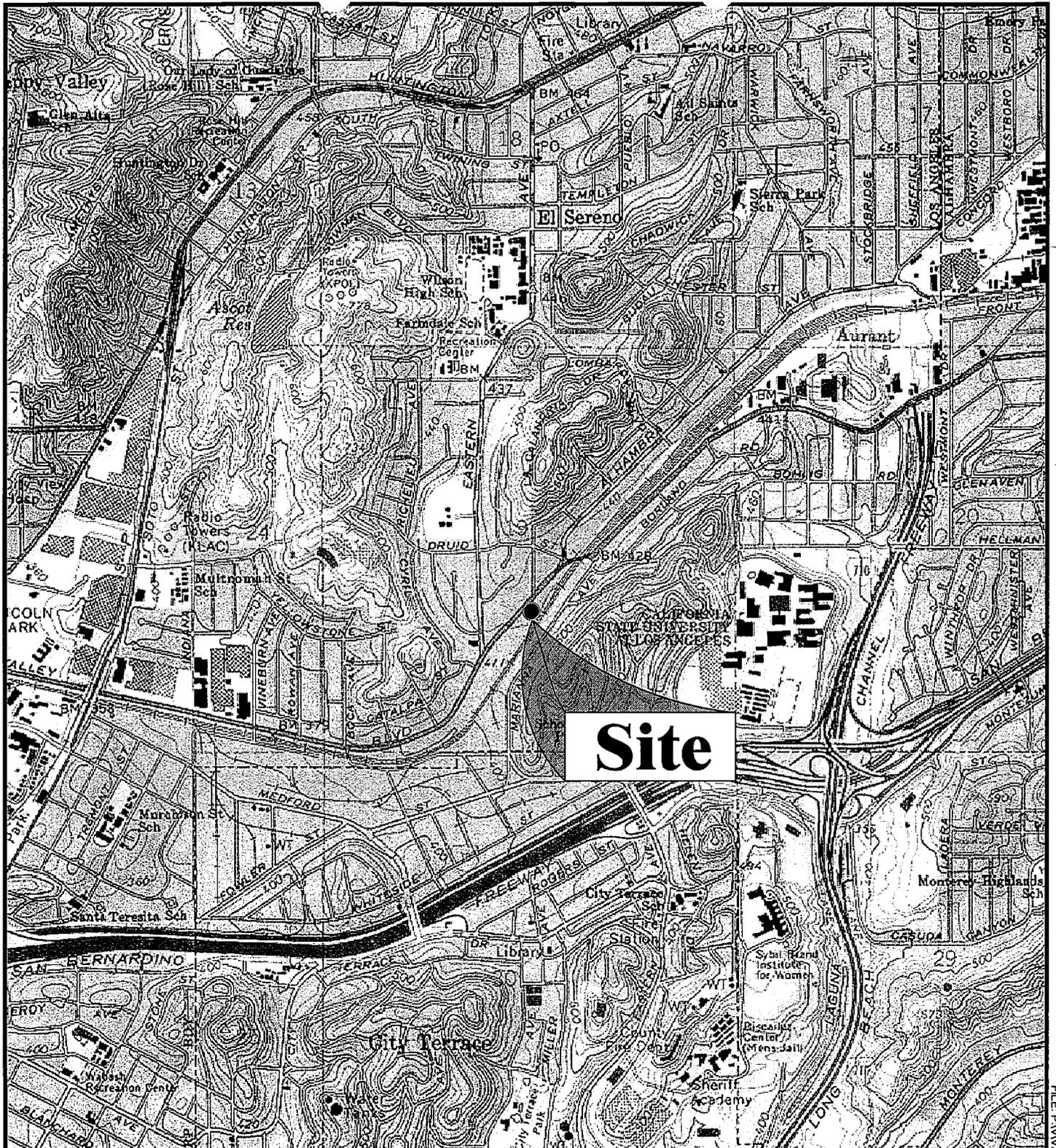
EA:slb

P:\A\Alhambra\Work Plan for Additional Investigation (Oct. 2008)\final work plan 111408.doc

Enclosures: Figures 1, 2, 3, 4a, and 4b
Attachment A

copy: Joan Donnellan, Parker Milliken Clark O'Hara & Samuelian
Gordon Billheimer, Leggett & Platt, Incorporated
Linda Northrup, Northrup Schlueter
Gary Herman, S.D. Herman Company, Incorporated

FIGURES

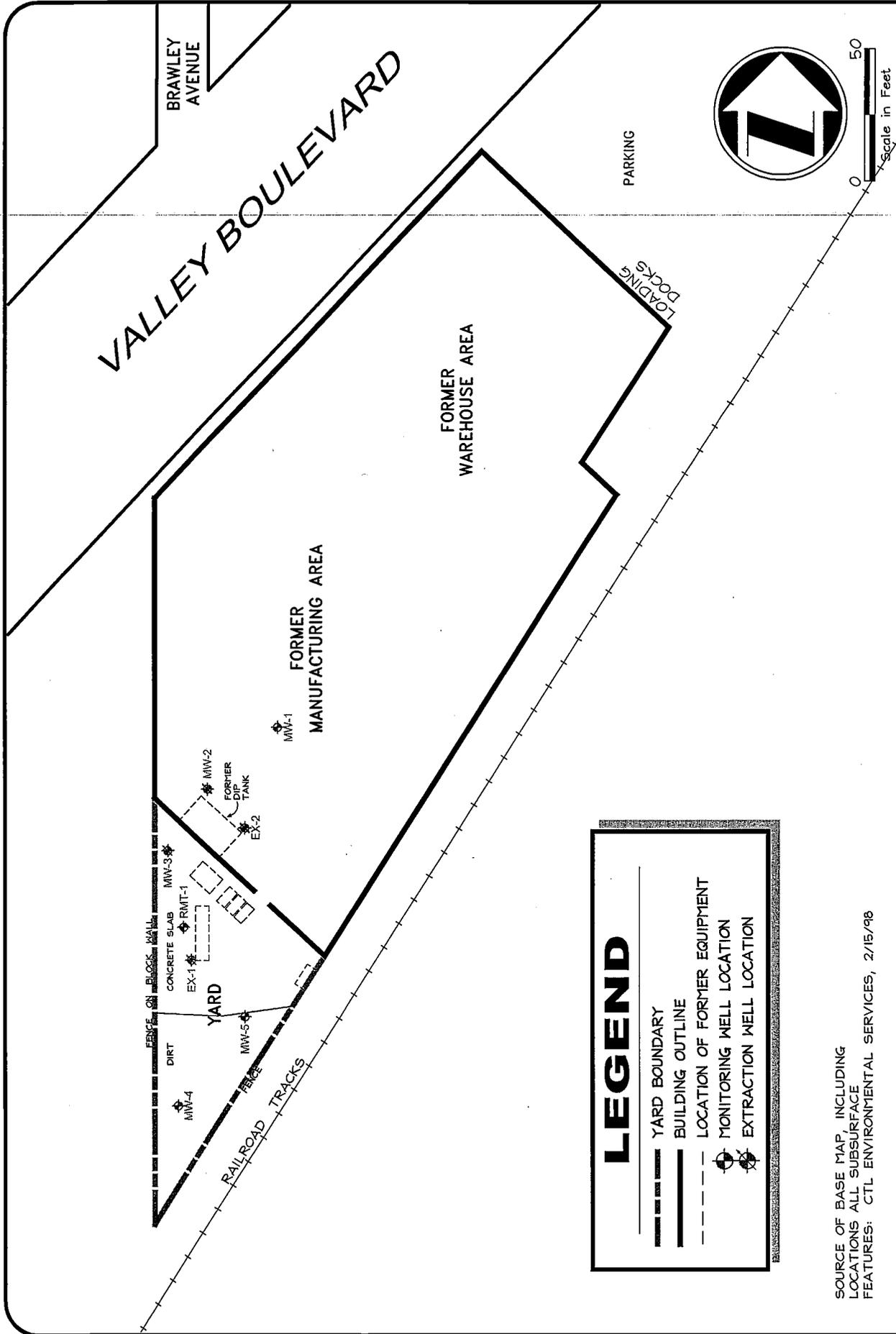


SOURCE: U.S.G.S. 7.5 minute series (topographic)
Los Angeles Quadrangle, CA, current as of 1994

CONTOUR INTERVAL 40 FEET
DOTTED LINES REPRESENT 10-FOOT CONTOURS
NATIONAL GEODETIC VERTICAL DATUM OF 1929
SCALE 1:24000

<h1>ENVIRON</h1>	<h2>Vicinity Map</h2> <p>4900 East Valley Boulevard Los Angeles, California</p>	<p>Figure 1</p>	
<p>Drafter: JJC</p>	<p>Date: 4/17/01</p>	<p>Contract Number: 04-9065A</p>	<p>Approved: _____ Revised: 7/14/03</p>

FILE: P1VALLEY-ALHAMBRA/PRAMING/9065A/F1A



LEGEND

- YARD BOUNDARY
- BUILDING OUTLINE
- - - LOCATION OF FORMER EQUIPMENT
- ⊕ MONITORING WELL LOCATION
- ⊗ EXTRACTION WELL LOCATION

SOURCE OF BASE MAP, INCLUDING LOCATIONS ALL SUBSURFACE FEATURES: CTL ENVIRONMENTAL SERVICES, 2/15/98

Figure 2

Site Plan
 4900 East Valley Boulevard
 Los Angeles, California

ENVIRON

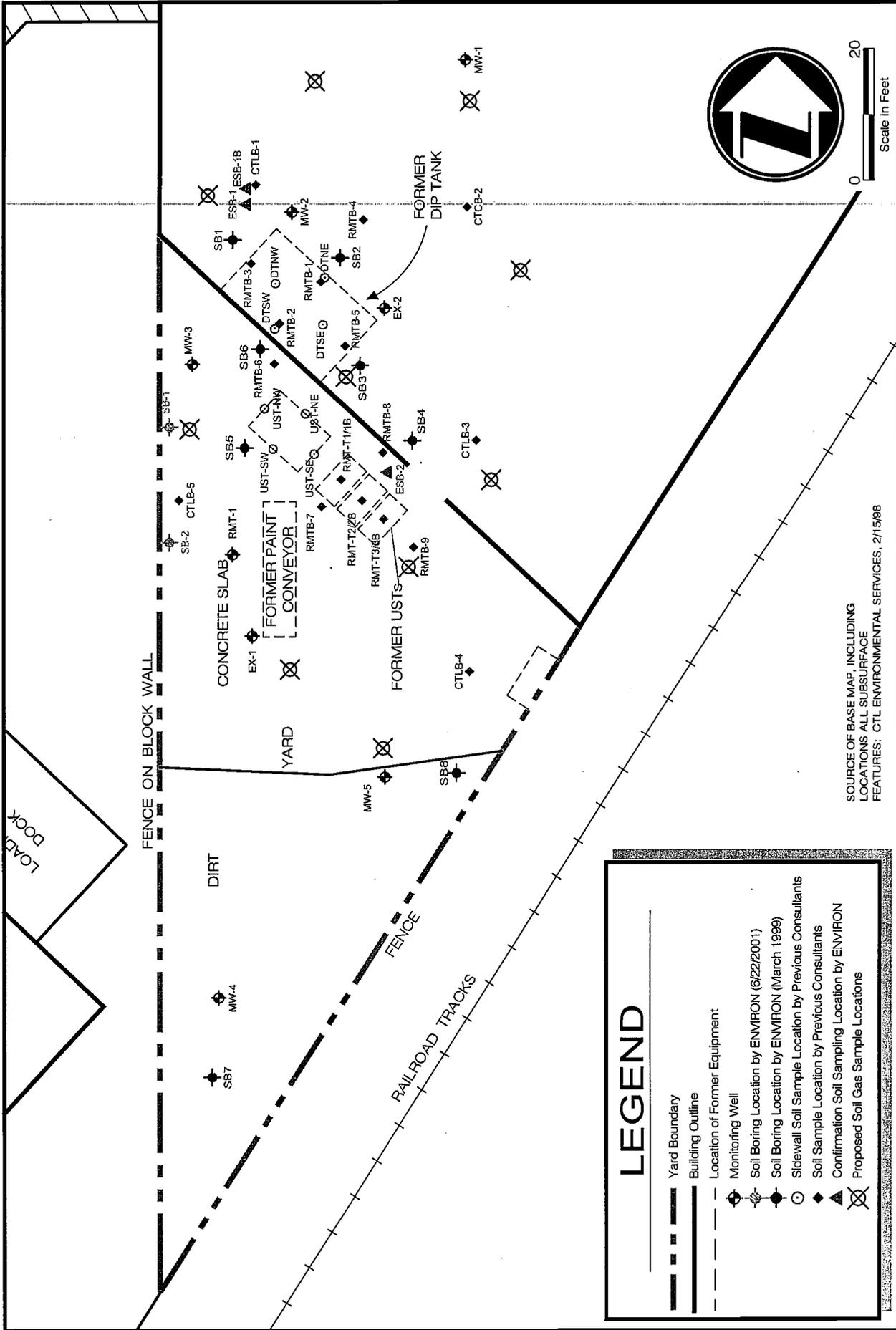
Revised: 3/12/03

Approved:

Contract Number: 04-9065A

Date: 4/17/01

Drafter: JJC



LEGEND

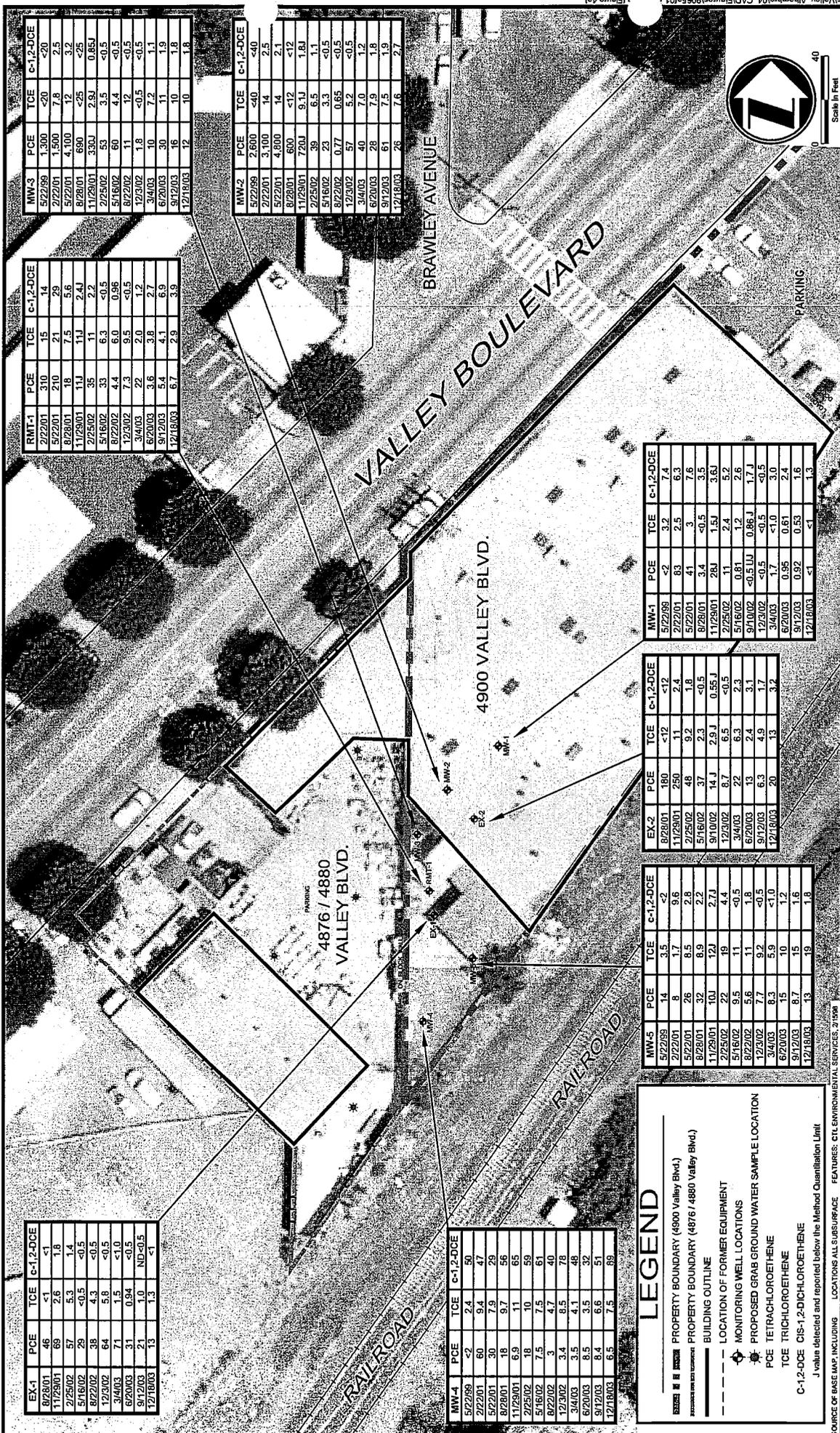
- Yard Boundary
- Building Outline
- - - Location of Former Equipment
- ⊕ Monitoring Well
- ⊕ Soil Boring Location by ENVIRON (6/22/2001)
- ⊕ Soil Boring Location by ENVIRON (March 1999)
- Sidewall Soil Sample Location by Previous Consultants
- ◆ Soil Sample Location by Previous Consultants
- ▲ Confirmation Soil Sampling Location by ENVIRON
- ⊗ Proposed Soil Gas Sample Locations

Figure 3

Proposed Soil Gas Sample Locations

4900 East Valley Boulevard
Los Angeles, California





EX-1	PCE	TCE	C-1,2-DCE
8/28/01	46	<1	<1
11/29/01	69	2.6	1.0
2/25/02	57	5.3	1.4
5/16/02	28	<0.5	<0.5
8/22/02	38	4.3	<0.5
12/30/02	64	5.8	<0.5
3/4/03	71	1.5	<1.0
6/20/03	31	0.94	<0.5
9/12/03	21	1.0	NP-0.5
12/16/03	13	1.3	<1

RMT-1	PCE	TCE	C-1,2-DCE
2/22/01	310	15	14
5/22/01	210	21	29
8/28/01	18	7.5	5.6
11/29/01	114	13.1	2.41
2/25/02	35	11	2.2
5/16/02	33	6.3	<0.5
8/22/02	4	6.3	0.86
12/30/02	7.3	6.3	<0.5
3/4/03	22	3.0	0.2
6/20/03	5.6	3.8	2.7
9/12/03	6.4	4.1	6.9
12/16/03	6.7	2.9	3.9

MW-3	PCE	TCE	C-1,2-DCE
5/22/99	1,300	<20	<20
2/22/01	1,500	7.8	3.2
5/22/01	4,100	12	<25
8/28/01	690	<25	0.85
11/29/01	330	2.6	0.85
2/25/02	53	3.5	<0.5
5/16/02	60	4.4	<0.5
8/22/02	11	12	<0.5
12/30/02	1.8	<0.5	<0.5
3/4/03	16	7.2	1.1
6/20/03	30	11	1.9
9/12/03	16	10	1.8
12/16/03	12	10	1.8

MW-2	PCE	TCE	C-1,2-DCE
5/22/99	2,600	<40	<40
2/22/01	3,100	14	2.5
5/22/01	4,300	14	2.1
8/28/01	600	<12	<12
11/29/01	720	9.1	1.8
2/25/02	39	6.5	1.1
5/16/02	23	3.3	<0.5
8/22/02	0.77	0.65	<0.5
12/30/02	57	5.2	<0.5
3/4/03	40	7.0	1.2
6/20/03	28	7.9	1.8
9/12/03	61	7.5	1.9
12/16/03	26	7.6	2.7

MW-5	PCE	TCE	C-1,2-DCE
5/22/99	14	3.5	<2
2/22/01	8	1.7	9.6
5/22/01	26	8.5	2.8
8/28/01	32	8.9	2.2
11/29/01	101	12.1	2.71
2/25/02	22	19	4.4
5/16/02	9.5	11	<0.5
8/22/02	5.6	11	1.8
12/30/02	7.7	9.2	<0.5
3/4/03	6.3	5.9	<1.0
6/20/03	15	10	1.2
9/12/03	6.7	15	1.5
12/16/03	5.3	15	1.8

EX-2	PCE	TCE	C-1,2-DCE
8/28/01	180	<12	<12
11/29/01	250	11	2.4
2/25/02	48	9.2	1.8
5/16/02	37	2.3	<0.5
8/28/01	14.1	2.6	0.55
11/29/01	281	1.54	3.61
2/25/02	11	2.4	5.2
5/16/02	0.84	1.2	2.6
8/28/01	<0.5	0.86	1.7
11/29/01	<0.5	<0.5	3.0
2/25/02	<0.5	<0.5	0.5
5/16/02	1.7	<1.0	2.4
8/28/01	0.95	0.61	1.6
11/29/01	0.92	0.53	1.3

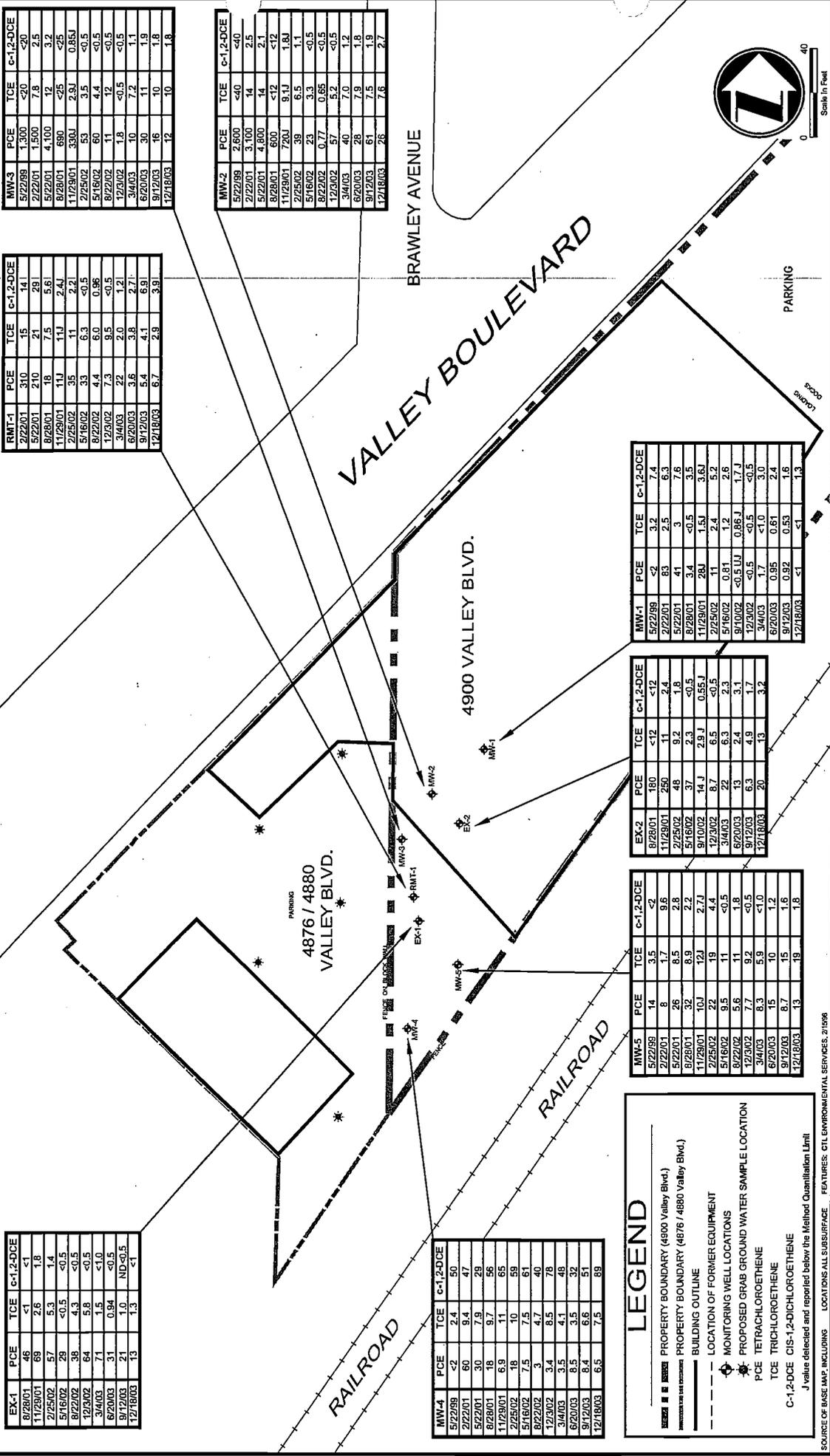
MW-1	PCE	TCE	C-1,2-DCE
5/22/99	<2	3.2	7.4
2/22/01	63	2.5	6.3
5/22/01	41	3	7.6
8/28/01	3.4	<0.5	3.5
11/29/01	281	1.54	3.61
2/25/02	11	2.4	5.2
5/16/02	0.84	1.2	2.6
8/28/01	<0.5	0.86	1.7
11/29/01	<0.5	<0.5	3.0
2/25/02	<0.5	<0.5	0.5
5/16/02	1.7	<1.0	2.4
8/28/01	0.95	0.61	1.6
11/29/01	0.92	0.53	1.3

RMT-3	PCE	TCE	C-1,2-DCE
2/22/01	310	15	14
5/22/01	210	21	29
8/28/01	18	7.5	5.6
11/29/01	114	13.1	2.41
2/25/02	35	11	2.2
5/16/02	33	6.3	<0.5
8/22/02	4	6.3	0.86
12/30/02	7.3	6.3	<0.5
3/4/03	22	3.0	0.2
6/20/03	5.6	3.8	2.7
9/12/03	6.4	4.1	6.9
12/16/03	6.7	2.9	3.9

MW-4	PCE	TCE	C-1,2-DCE
5/22/99	<2	2.4	50
2/22/01	60	9.4	47
5/22/01	30	7.9	29
8/28/01	18	9.7	56
11/29/01	6.9	11	65
2/25/02	18	10	59
5/16/02	7.5	7.5	61
8/22/02	3	4.7	40
12/30/02	3.4	8.5	78
3/4/03	3.5	4.1	48
6/20/03	8.5	3.5	32
9/12/03	8.4	6.6	51
12/16/03	6.5	7.5	69

LEGEND

- PROPERTY BOUNDARY (4900 Valley Blvd.)
- PROPERTY BOUNDARY (4876 / 4880 Valley Blvd.)
- BUILDING OUTLINE
- LOCATION OF FORMER EQUIPMENT
- MONITORING WELL LOCATIONS
- PROPOSED GRAB GROUND WATER SAMPLE LOCATION
- PCE TETRACHLOROETHENE
- TCE TRICHLOROETHENE
- C-1,2-DCE CIS-1,2-DICHLOROETHENE
- J value detected and reported below the Method Quantitation Limit



EX-1	PCE	TCE	c-1,2-DCE
8/28/01	46	<1	<1
11/29/01	69	2.6	1.8
2/25/02	57	5.3	1.4
8/22/02	38	<0.5	<0.5
12/3/02	64	5.8	<0.5
3/4/03	71	1.5	<1.0
6/20/03	31	0.94	<0.5
9/12/03	21	1.0	ND<0.5
12/18/03	13	1.3	<1

RMT-1	PCE	TCE	c-1,2-DCE
2/22/01	310	15	141
5/22/01	210	21	291
8/28/01	18	7.5	5.61
11/29/01	11J	11J	2.4J
2/25/02	35	11	2.1
5/16/02	33	6.3	<0.5
8/22/02	4.4	6.0	0.95
12/3/02	7.3	9.5	<0.5
3/4/03	22	2.0	1.2
6/20/03	3.6	3.8	2.71
9/12/03	5.4	4.1	6.91
12/18/03	6.7	2.9	3.91

MW-3	PCE	TCE	c-1,2-DCE
5/22/99	1,300	<20	<20
2/22/01	1,500	7.8	2.5
5/22/01	4,100	12	3.2
8/28/01	890	<25	<25
11/29/01	330J	2.9J	0.85J
2/25/02	53	3.5	<0.5
5/16/02	60	4.4	<0.5
8/22/02	11	12	<0.5
12/3/02	1.8	<0.5	<0.5
3/4/03	10	7.2	1.1
6/20/03	30	11	1.9
9/12/03	16	10	1.8
12/18/03	12	10	1.8

MW-2	PCE	TCE	c-1,2-DCE
5/22/99	2,600	<40	<40
2/22/01	3,100	14	2.5
5/22/01	4,800	14	2.1
8/28/01	600	<12	<12
11/29/01	720J	9.1J	1.8J
2/25/02	39	6.5	1.1
5/16/02	23	3.3	<0.5
8/22/02	0.77	0.65	<0.5
12/3/02	57	5.2	<0.5
3/4/03	40	7.0	1.2
6/20/03	28	7.9	1.8
9/12/03	61	7.5	1.9
12/18/03	26	7.6	2.7

MW-1	PCE	TCE	c-1,2-DCE
5/22/99	<2	3.2	7.4
2/22/01	83	2.5	6.3
5/22/01	41	3	7.6
8/28/01	3.4	<0.5	3.5
11/29/01	28J	1.5J	3.6J
2/25/02	11	2.4	5.2
5/16/02	0.81	1.2	2.6
8/22/02	<0.511J	0.86J	1.7J
12/3/02	1.5	<0.5	<0.5
3/4/03	1.5	<1.0	3.0
6/20/03	0.95	0.81	2.4
9/12/03	0.92	0.93	4.8
12/18/03	<1	0.93	1.3

MW-5	PCE	TCE	c-1,2-DCE
5/22/99	14	3.5	<2
2/22/01	8	1.7	9.6
5/22/01	26	8.5	2.8
8/28/01	32	8.9	2.2
11/29/01	10J	12J	2.7J
2/25/02	22	19	4.4
5/16/02	9.5	11	<0.5
8/22/02	5.6	11	1.8
12/3/02	7.7	9.2	<0.5
3/4/03	8.3	5.9	<1.0
6/20/03	15	10	1.2
9/12/03	8.7	15	1.6
12/18/03	13	19	1.8

MW-4	PCE	TCE	c-1,2-DCE
5/22/99	<2	2.4	50
2/22/01	60	9.4	47
5/22/01	30	7.9	29
8/28/01	18	9.7	56
11/29/01	6.9	11	65
2/25/02	18	10	59
5/16/02	7.5	7.5	63
8/22/02	3	4.7	46
12/3/02	3.4	8.5	78
3/4/03	3.5	4.3	48
6/20/03	8.2	3.5	32
9/12/03	8.4	9.8	51
12/18/03	6.5	7.5	89

LEGEND

- PROPERTY BOUNDARY (4900 Valley Blvd.)
- PROPERTY BOUNDARY (4876 / 4880 Valley Blvd.)
- BUILDING OUTLINE
- LOCATION OF FORMER EQUIPMENT
- MONITORING WELL LOCATIONS
- PROPOSED GRAB GROUND WATER SAMPLE LOCATION
- PCE TETRACHLOROETHENE
- TCE TRICHLOROETHENE
- C-1,2-DCE CIS-1,2-DICHLOROETHENE
- J value detected and reported below the Method Quantitation Limit

SOURCE OF BASE MAP: INCLUDES LOCATIONS ALL SUBSURFACE FEATURES: CIT ENVIRONMENTAL SERVICES, 2/19/98

ATTACHMENT A
Grab Ground Water Sampling Protocol

GRAB GROUND WATER SAMPLING PROTOCOL

1.0 INTRODUCTION

This protocol describes the procedures to be followed during collection of "grab" ground water samples using the Enviro Probe, HydroPunch, temporary well point, and/or sampling inside the augers. These tools and methods are generally used to collect ground water samples for chemical analysis during ground water screening programs, and in some cases to measure water levels or pore pressure at discrete depths.

A DAILY FIELD RECORD will be completed for each day of fieldwork, and the project manager will keep the original form in the project files after review. Soil borings drilled in conjunction with the collection of discrete-depth ground water samples will be in drilled in accordance with the protocol DRILLING AND DESTRUCTION OF SOIL BORINGS. Ground water samples collected for chemical analysis will be handled in accordance with the SAMPLING ANALYSIS PLAN.

The procedures presented herein are intended to be of general use and, where necessary, may be supplemented by a work plan and/or health and safety plan. As the work progresses, and if warranted, appropriate revisions may be made by the project manager. Detailed procedures in this protocol may be superseded by applicable agency requirements.

2.0 SAMPLING EQUIPMENT

The Enviro Probe, HydroPunch, temporary well point, and/or sampling inside the augers, can be used with several subsurface exploration methods, including hollow stem auger drilling, mud rotary drilling, and cone penetrometer testing (CPT). Selection of the appropriate sampling tool should be based on anticipated field conditions such as the site hydrogeology (e.g., depth of sampling location below the water table, soil grain size, and estimated permeability), and type of subsurface exploration method employed. If required, permits for drilling soil borings will be acquired from the appropriate agency or agencies before the drilling is initiated. An underground utility check will, at a minimum, consist of contacting a local utility alert service, if available.

2.1 Enviro Probe

The Enviro Probe consists of a stainless steel drive point with a retractable outer sleeve; a stainless steel, wire-cloth filter; various viton rubber O-rings; and a flexible viton rubber seal (septum) at the upper end of the probe, as shown in the figure ENVIRO PROBE SCHEMATIC. The rubber septum provides a watertight seal that prevents water from readily entering or existing the top of the probe. The filter is attached to the inside body of the probe and is protected by the retractable outer sleeve. The sample reservoir is part of a separate assembly, as discussed in Section 3.1. The tool can be disassembled readily for cleaning between sampling events.

2.2 HydroPunch

The HydroPunch consists of a drive point, a stainless steel screen section, a sample reservoir integral with the tool body, and assorted O-rings and check valves to create watertight seals between the various components. Two models of the HydroPunch have been developed, HydroPunch I and HydroPunch II, each having slightly different designs and/or component parts. All components are made of stainless steel, Teflon, or other relatively inert materials. The tool can be disassembled easily for cleaning between sampling events.

2.3 Temporary Well Point

Installation of a temporary well point is similar to installation of a permanent monitoring well. A PVC well (comprised of 2-inch diameter well screen and riser; well screen typically is 5-foot long) is emplaced inside the augers to the desired depth. A gravel pack is emplaced surrounding the well screen to approximately 2 feet above the well screen as the augers are slowly pulled from the borehole, leaving the approximately 5-foot long well screen and surrounding gravel pack in the targeted water-bearing zone.

2.4 Sampling Inside the Hollow Stem Auger

If it is not feasible to obtain a grab ground water sampling using either HydroPunch or temporary well points, grab ground water samples also can be collected directly from inside the augers.

3.0 SAMPLING METHODS

Installation of the Enviro Probe or HydroPunch generally follows the same procedure. A target sample interval (target zone) is usually identified prior to collecting a sample. When sampling while using conventional drilling methods, the soil boring is advanced to a depth immediately above the target zone prior to installing the sampling tool. The sampling tool is attached to one of several different types of standard drilling rods (minimum 1-inch inside diameter for the Enviro Probe), lowered to the bottom of the existing borehole, and advanced (driven or pushed) approximately 2 to 4 feet into undisturbed formation. Internal seals and/or check valves create a water tight sampling tool while in the closed position, so that the Enviro Probe or HydroPunch can be used in fluid filled boreholes.

After the sampling tool is emplaced at the target sample depth, the outer sleeve is retracted approximately 1 to 1.5 feet (generally 1 foot of retraction for the Enviro Pro and 1.5 feet of retraction for the HydroPunch). As the outer sleeve is retracted, subsurface friction keeps the drive point in place, exposing the screen section, and allowing water to enter the sampling tool.

3.1 Enviro Probe Sampling Procedure

Ground water samples are collected by lowering the appropriate ground water monitoring system (GMS) tool down the drive rod (i.e., drill rod). The GMS tools consist of a pore pressure transducer unit (i.e. an in situ pressure transducer with a cable of