

1 **NORTON ROSE FULBRIGHT US LLP**
2 ELIZABETH M. WEAVER
3 LAUREN A. SHOOR (BAR NO. 280788)
4 555 South Flower Street
5 Forty-First Floor
6 Los Angeles, California 90071
7 Telephone: (213) 892-9200
8 Facsimile: (213) 892-9494
9 elizabeth.weaver@nortonrosefulbright.com
10 lauren.shoor@nortonrosefulbright.com

11 Attorneys for Respondent
12 EXXONMOBIL OIL CORPORATION

13 BEFORE THE STATE OF CALIFORNIA
14 STATE WATER RESOURCES CONTROL BOARD

15 IN THE MATTER OF THE PETITION OF
16 FORMER EXXONMOBIL JALK FEE
17 PROPERTY
18 California Regional Water Quality Control
19 Board, Los Angeles Region

Case No. _____

**PETITION FOR REVIEW AND REQUEST
FOR HEARING AND STAY**

(Cal. Water Code §§ 13320, 13321; Cal. Code
Regs. tit. 23 § 2050 *et seq.*)

20 **INTRODUCTION**

21 Petitioner ExxonMobil Oil Corporation (“ExxonMobil” or “Petitioner”) respectfully
22 petitions the California State Water Resources Control Board (“State Board”) to review the Los
23 Angeles Regional Water Quality Control Board’s (“Regional Board”) Requirement for Submittal
24 of Technical Reports issued to ExxonMobil on November 18, 2016 pursuant to California Water
25 Code Section 13267 Order Dated August 24, 2010. ExxonMobil brings this petition pursuant to
26 California Water Code section 13320 and California Code of Regulations (“CCR”) Title 23,
27 Section 2050 *et seq.*
28

1 **PETITION FOR REVIEW**

2 **I. NAME AND ADDRESS OF PETITIONER**

3 ExxonMobil Oil Corporation
4 c/o Len Racioppi, Global Development Area Manager – Manufacturing / Superfund
5 22777 Springwoods Village Parkway
6 Spring, TX 77389
7 Telephone: INSERT
8 Email: len.m.racioppi@exxonmobil.com

9 Elizabeth Weaver
10 Norton Rose Fulbright US LLP
11 555 South Flower Street
12 41st Floor
13 Los Angeles, CA 90071
14 Telephone: (213) 892-9290
15 Email: Elizabeth.Weaver@nortonrosefulbright.com

16 **II. REGIONAL BOARD ACTION FOR WHICH PETITIONER SEEKS REVIEW**

17 Petitioner seeks review of the Regional Board’s November 18, 2016 Requirement for
18 Submittal of Technical Reports, Pursuant to California Water Code Section 13267 Order Dated
19 August 24, 2010 (“Requirement for Submittal of Technical Reports”). A copy of the
20 Requirement for Submittal of Technical Reports is attached hereto as Exhibit 1.

21 **III. DATE OF REGIONAL BOARD ACTION**

22 The Regional Board issued the Requirement for Submittal of Technical Reports on
23 November 18, 2016.

24 **IV. STATEMENT OF REASONS WHY THE ACTION WAS INAPPROPRIATE OR**
25 **IMPROPER**

26 The Regional Board’s Requirement for Submittal of Technical Reports is improper
27 because ExxonMobil should not be identified as a Responsible Party. ExxonMobil has been in
28 communication with the Regional Board regarding the fact that Continental Heat Treating
29 (“CHT”) is the appropriate Responsible Party at the Jalk Fee property, not ExxonMobil. Most
30 recently, ExxonMobil representatives met with the Regional Board on December 14, 2016 in
31 furtherance of the issue. Prior to the meeting, the Regional Board represented to the project
32 manager for ExxonMobil that the Regional Board would not issue any further directives pursuant

1 to the 13267 Order until after the planned December 14 meeting, perhaps anticipating the issue of
2 the appropriate RP would be resolved at the scheduled meeting. Nevertheless, on November 18,
3 2016—after the December 14, 2016, meeting had been scheduled—the Regional Board issued the
4 Requirement for Submittal of Technical Reports.

5 ExxonMobil has presented the Regional Board with evidence that chlorinated solvents
6 migrated from the adjacent CHT property to the Jalk Fee property including information showing:
7 (1) ExxonMobil did not use, store, or discharge chlorinated solvents found in soil at the former
8 Jalk Fee property (“Jalk Fee”), (2) CHT owned and operated, and continues to own and operate, a
9 heat treating business adjacent to Jalk Fee that used and stored PCE, and other chlorinated
10 solvents, in its operations from approximately 1969 to 1995, (3) CHT operated multiple
11 degreasers with documented spills, releases, and even fires in the degreaser on its property as
12 documented by a number of governmental agencies and was cited for improper waste disposal
13 practices, including the disposal of hazardous waste to unauthorized points, and (4) hydrocarbons
14 detected in the soil at the Jalk Fee/CHT property boundary that are co-located with the
15 chlorinated solvent contamination are not crude oil or petroleum fuels such as diesel fuel and
16 most closely resemble a mix of quench oils and mineral oils known to be used in heat treating
17 operations. To date, based only on the fact that chlorinated solvents have been found in soil at the
18 Jalk Fee property (and without any evidence or records indicating that ExxonMobil used, stored,
19 or discharged chlorinated solvents at the former Jalk Fee property), the Regional Board has
20 refused to rescind its Section 13267 order and continues to issue new requirements to
21 ExxonMobil. ExxonMobil has not seen or identified any records indicating that it used or stored
22 chlorinated solvents at the Jalk Fee property and has not discharged chlorinated solvents at Jalk
23 Fee. In light of the evidence before the Regional Board, there is no reasonable basis for the
24 Regional Board to suspect that ExxonMobil discharged chlorinated solvents at the Jalk Fee
25 property. Therefore, the Requirement for Submittal of Technical Reports is improper.

26 **V. MANNER IN WHICH PETITIONER IS AGGRIEVED**

27 Despite the lack of evidence that ExxonMobil stored, used, or discharged chlorinated
28 solvents at the Jalk Fee property, the Regional Board is requiring ExxonMobil to (1) conduct

1 winter and summer indoor air sampling and risk assessment at two on-site buildings and one off-
2 site building and submit a report on the assessment by September 29, 2017, (2) prepare an
3 additional site assessment work plan by January 30, 2017, and (3) submit public participation
4 information (technical report) by February 15, 2017. Because ExxonMobil is not a Responsible
5 Party, these requirements are unwarranted, unfair, burdensome and expensive and should be the
6 responsibility of Continental Heat Treating.

7 **VI. ACTION REQUESTED BY PETITIONER**

8 ExxonMobil respectfully requests that the State Board (1) accept this Petition; (2) stay the
9 Requirement for Submittal of Technical Reports pursuant to CCR, Title 23, Section 2053, and (3)
10 rescind the Regional Board's Requirement for Submittal of Technical Reports.

11 **VII. STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF PETITION**

12 In order to issue a Water Code section 13267 order, or requirements pursuant to such an
13 order, the Regional Board must have evidence that ExxonMobil discharged, or is suspected of
14 having discharged, chlorinated solvents at the Jalk Fee Property. But, the Regional Board has not
15 provided any evidence that ExxonMobil caused a discharge of chlorinated solvents at the Jalk Fee
16 Property. Because there is no evidence that ExxonMobil stored, used, or discharged chlorinated
17 solvents, and no evidence to support even a suspicion that ExxonMobil discharged chlorinated
18 solvents, the Regional Board has improperly issued the Requirement for Submittal of Technical
19 Reports.

20 As demonstrated in ExxonMobil's March 25, 2015 Request to Name CHT as Discharger
21 (attached hereto as Exhibit 2) and during meetings held with the Regional Board on March 3,
22 2015, July 7, 2016, and December 14, 2016, ExxonMobil has not used chlorinated solvents
23 during its operations at the Jalk Fee property or stored chlorinated solvents at the Jalk Fee
24 property. Further, there is substantial evidence that chlorinated solvents were used, stored, *and*
25 *discharged*, at the adjacent CHT property. Recent investigations conducted by ExxonMobil in
26 the late fall of 2016 have produced new information demonstrating that heat treating quench oils
27 are also present at locations where the highest concentrations of chlorinated solvents have been
28 found, which strongly supports the conclusion that the chlorinated solvents on the Jalk Fee

1 property were directly associated with CHT's heat treating operations and waste management
2 practices. There is simply no reasonable basis to suspect that ExxonMobil discharged chlorinated
3 solvents (or quench oils, for that matter) at the Jalk Fee property.

4 **A. Legal Standard**

5 Pursuant to California Water Code section 13267, the Regional Board may require any
6 person who *has discharged, discharges, or is suspected of having discharged or*
7 *discharging*...waste within its region to furnish technical or monitoring program reports.¹ Water
8 Code § 13627(b)(1). The Regional Board must identify the evidence that supports requiring that
9 person to provide the reports. *Id.*

10 **B. ExxonMobil Has Presented Evidence Establishing That it Has Not**
11 **Discharged Chlorinated Solvents at the Jalk Fee Property**

12 The Jalk Fee property was used as an oil production field from approximately the 1920s
13 until 1996. It was originally operated by ExxonMobil predecessors, and later leased to, and
14 operated by, Hathaway Oil Company. In the 1990s, ExxonMobil and Hathaway ceased oil
15 production and removed the infrastructure from the property. The Jalk Fee property was
16 redeveloped into an industrial park in 2003, and the current operators are not known to have used
17 chlorinated solvents in their operations. Chlorinated solvents are not standard chemicals used in
18 oil field operations, and ExxonMobil is not aware of any records indicating that ExxonMobil or
19 Hathaway used chlorinated solvents or that such chemicals were stored or released on the Jalk
20 Fee property.²

21
22
23 ¹ In addition, Water Code section 13304 authorizes the water board to issue "cleanup and abatement" orders requiring
24 a discharger to cleanup and abate waste, take other necessary remedial action, where the discharger "has caused or
25 permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or
26 probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or
27 nuisance." Water Code § 13304(a). The Regional Board has not issued a cleanup and abatement order to
28 ExxonMobil, and is proceeding under a Water Code section 13267 investigation order at this time. However, neither
13304 nor 13267 provides any legal basis for requiring ExxonMobil to assess or remediate contamination caused by
another party under the facts at the Jalk Fee site, which clearly identify a responsible polluter or discharger (CHT)
that can be required to address the contamination resulting from its operations.

² While petroleum-based solvents have sometimes been used in oil production activities, chlorinated solvents
(including PCE) have not. Industry standard solvents used in oil production activities would be non-chlorinated
hydrocarbon-based, such as mid-distillates, xylenes and other aromatic compounds. This is consistent with
ExxonMobil's statements that there is no evidence of PCE use during the oil and gas activities at the site.

1 On the other hand, CHT, who operates the adjacent property to the south of the Jalk Fee
2 property, has been, and is, in the business of cleaning metal parts and processing them with
3 heat—a process that often involves placing the metals parts in a vapor degreaser that employs
4 chlorinated solvents, and then using quench oils to cool metal parts after they are heat-treated.
5 CHT used significant quantities of chlorinated solvents (specifically including PCE) and quench
6 oils in its operations for more than 25 years. The record also clearly shows that CHT had poor
7 operational and waste management practices, as documented by various agencies. CHT has had
8 known discharges of chlorinated solvents and quench oil wastes to the ground, and the Regional
9 Board acknowledges that on-site releases of chlorinated solvents and oils occurred at CHT's
10 property as a result of CHT's operations.

11 Because the Jalk Fee property had a dirt surface and was unpaved until its redevelopment
12 in 2003, and the CHT property was paved with asphalt and concrete surfaces since its
13 construction in 1969, rainwater and/or spills from the CHT property would have migrated to the
14 Jalk Fee property. ExxonMobil presented the Regional Board with a conceptual site model
15 demonstrating that the chlorinated solvents on Jalk Fee migrated from CHT's property, as well as
16 aerial photos showing the paved surfaces at CHT throughout its operations. ExxonMobil's site
17 conceptual model utilized facts from historical records showing CHT releases of PCE and quench
18 oils at the property boundary between CHT and Jalk Fee. The conceptual site model
19 demonstrates that because (1) the Jalk Fee property was unpaved and unfenced during the
20 majority of the period when CHT was using PCE, (2) CHT's property was paved, and (3) there is
21 a migration pathway onto the Jalk Fee property due to shallow subsurface low permeability
22 layer(s) dipping to the north from the CHT property onto the Jalk Fee property, the conceptual
23 site model demonstrates how PCE in soil at the Jalk Fee property is attributable to the activities of
24 CHT.

25 Further, as presented to the Regional Board on a meeting held on December 14,
26 chlorinated solvents in soils sampled at the Jalk Fee property, near the boundary between the
27 CHT property and Jalk Fee, are co-located with various hydrocarbons. The hydrocarbons are
28 inconsistent with crude oil such as that produced on Jalk Fee and also inconsistent with other

1 conventional petroleum fuels such as diesel fuel. The soils contain a range of largely de-
2 aromatized hydrocarbons that are consistent with quench oils used in heat treating operations,
3 including the type of quench oil used by CHT according to historical records. CHT documents
4 identify quench oils and mineral oils among the chemicals stored and used at the CHT property.
5 Forensic analysis shows that a mixture of quench oils and mineral oils typically used in heat
6 treating operations accounts for the hydrocarbon fingerprint found in the soil at the property
7 boundary between the Jalk Fee and CHT properties. This evidence further substantiates
8 ExxonMobil's conceptual site model—that waste from the CHT property (chlorinated solvents
9 and a mix of quench/mineral oils) migrated from the CHT property to the Jalk Fee property.

10 This evidence establishes that ExxonMobil has not discharged, or permitted a discharge
11 of, chlorinated solvents at the Jalk fee property.

12 **C. The Regional Board Has No Evidence that Chlorinated Solvents Were Used,**
13 **Stored, or Discharged at the Jalk Fee Property**

14 The sole evidence relied upon by the Regional Board to support its contention that
15 ExxonMobil either discharged or is suspected of having discharged chlorinated solvents on the
16 Jalk Fee property is (1) PCE was detected in soil at certain locations on the Jalk Fee property, (2)
17 an EPA report lists “waste solvents” as being generated at some oil production properties, (3) the
18 geologic cross-section generated by the Regional Board indicates a silty surface dips from the
19 Jalk Fee property to the CHT property which could serve as a pathway for contaminants to
20 migrate from the Jalk Fee property onto CHT's property, and (4) that there was a “trucking
21 operation” on the Jalk Fee property. Los Angeles Regional Water Quality Control Board's
22 (“Regional Board”) Response to ExxonMobil's Request to Name Continental Heat Treating as
23 Discharger Pursuant to California Water Code Section 13267 Order Dated August 24, 2010,
24 issued on July 22, 2016 (attached hereto as Exhibit 3).

25 First, regarding the “waste solvents” identified in a 2002 EPA publication, as is stated
26 above, while petroleum-based solvents are used in oil production activities, chlorinated solvents
27 (including PCE) are not. Industry standard solvents used in oil production activities would be
28 non-chlorinated hydrocarbon-based, such as mid-distillates, xylenes and other petroleum

1 compounds. This is consistent with ExxonMobil's statements that there is no evidence of PCE
2 use during the oil and gas activities at the site.

3 Second, regarding the Regional Board's cross-section, the Regional Board used only two
4 data points to develop its cross-section—which is not consistent with industry geologic practice.
5 On the other hand, a Professional Geologist from Cardno developed cross-sections based upon
6 evaluation of the logs of the numerous borings and wells drilled at the two sites, which confirms
7 that the silt layer slopes from the CHT property to the Jalk Fee property—the exact opposite of
8 what is shown in the Regional Board's cross-sections.

9 Third, regarding the alleged "trucking operation" on the property, there are no records of
10 the property being leased by a trucking company, that truck repair activities were present at the
11 Jalk Fee property, or of any trucking operation that utilized PCE or other chlorinated solvents.
12 ExxonMobil and Hathaway's operations on the property were limited to oil and gas operations.
13 In fact a recent review by a retained interpretative aerial photographer indicates a lack of
14 structures of sufficient size to be used for truck repairs. Further, ExxonMobil conducted a soil
15 gas investigation in the former trucking operations area in 1996, and the results indicated that a
16 release of PCE had not occurred in this area. Therefore this area is not a secondary source. And
17 again, there is no evidence of an onsite release of PCE in this vicinity.

18 Finally, in light of the evidence ExxonMobil presented to the Regional Board regarding
19 the operations at the Jalk Fee and the CHT properties, and based on ExxonMobil's conceptual site
20 model, the mere presence of PCE in soil at certain locations at the Jalk Fee property does not
21 support ExxonMobil being identified as the Responsible Party. The distribution of PCE in soil
22 borings at Jalk Fee is consistent with ExxonMobil's conceptual site model, which demonstrated
23 pathways and mechanisms that resulted in PCE migrating laterally away from the CHT source
24 area near the property boundary. The mere presence of PCE in certain soil borings identified by
25 the Regional Board at Jalk Fee alone does not require the assumption of a second release area on
26 the Jalk Fee property.

27 All of the theories relied on by the Regional Board are mere speculation. No evidence has
28 been presented showing a discharge or release of chlorinated solvents by ExxonMobil, or even of

1 a discharge of chlorinated solvents of which ExxonMobil was aware or which it allowed to occur.
2 While the Regional Board may have presented some evidence—none of which indicated that
3 ExxonMobil discharged or released *or even used* chlorinated solvents on Jalk Fee—in issuing its
4 original Section 13267 Order on August 27, 2010, ExxonMobil has since provided a much more
5 convincing and plausible explanation for the source of the chlorinated solvents found in the soil at
6 the Jalk Fee property. In light of the direct and indirect evidence presented to the Regional
7 Board, there is no reasonable basis for the Regional Board to suspect that ExxonMobil has
8 discharged chlorinated solvents at the Jalk Fee property. Therefore the Requirement for
9 Submittal of Technical Reports must be rescinded.

10 **VIII. STATEMENT THAT COPIES OF PETITION HAVE BEEN SENT TO THE**
11 **REGIONAL BOARD**

12 A copy of this Petition was transmitted to the Executive Officer of the Regional Board on
13 December 19, 2016.

14 **IX. STATEMENT THAT THE ISSUES RAISED IN THE PETITION WERE**
15 **PRESENTED TO THE REGIONAL BOARD**

16 The issues raised in this petition were raised before the Regional Board on numerous
17 occasions, most recently in the Request to Name Continental Heat Treating as Discharger
18 submitted by ExxonMobil on March 25, 2015 and before the Regional Board during meetings
19 between the Regional Board and ExxonMobil on March 3, 2015, July 7, 2016, and December 14,
20 2016. Regarding any newly discovered information raised in this petition, ExxonMobil was not
21 able to raise them below because ExxonMobil was unaware of them and could not have
22 reasonably been aware of them in time to raise them before the Regional Board.

23 **X. REQUEST FOR PREPARATION OF THE ADMINISTRATIVE RECORD**

24 By copy of this Petition to the Executive Office of the Regional Board, ExxonMobil
25 hereby requests the preparation of the administrative record herein.

26 **XI. REQUEST FOR HEARING**

27 ExxonMobil requests that the State Board hold a hearing in this matter.
28

1 **XII. REQUEST FOR STAY**

2 ExxonMobil requests that the State Board issue a stay of the Requirement for Submittal of
3 Technical Reports as to ExxonMobil as of the date of issuance pursuant to CCR, Title 23, Section
4 2053, while the State Board is considering this petition. As set forth in the declaration of Len
5 Racioppi, submitted concurrently with this petition, since the State Board has up to 90 days to
6 review an action upon a petition, there will be substantial harm to ExxonMobil from the costs of
7 implementing actions for which it is not liable. Declaration of Len Racioppi (“Racioppi Decl.”),
8 ¶ 2. Specifically, ExxonMobil will be required to (1) conduct indoor air sampling and risk
9 assessment at two on-site and one off-site building during the winter of 2016-2017, (2) prepare
10 an additional site assessment work plan by January 30, 2017, and (3) submit public participation
11 information (technical report) by February 15, 2017. Racioppi Decl. ¶ 2. Each of these would
12 need to be completed before the State Board is required to act on ExxonMobil’s petition. *Id.* A
13 preliminary estimate by ExxonMobil’s environmental consultant, Cardno, indicates that, the
14 completing the work in the Requirement for Submittal of Technical Reports could cost up to
15 \$50,000. *Id.*

16 Granting a stay of the Requirement for Submittal of Technical Reports will not cause
17 substantial harm to other interested persons or to the public, because the years that have passed
18 between each of the Regional Board’s efforts with regard to the Jalk Fee property demonstrate
19 that the Board does not view this site as presenting near-term risks. Racioppi Decl. ¶ 3.
20 ExxonMobil acknowledges that the delays by the Regional Board in issuing formal directives
21 between November 2014 and November 2016 have been largely due to the discussions taking
22 place between ExxonMobil and the Regional Board in trying to resolve the issue of which party is
23 the appropriate RP to conduct this work, and not due to the Regional Board’s failure to take
24 timely action. ExxonMobil respectfully suggests that resolving the issue of the appropriate
25 discharger has been, and should continue to be, very important to resolve before new directives
26 are undertaken. ExxonMobil notes the following relevant delays have already occurred: it
27 submitted an amended work plan for the indoor air assessment on November 14, 2014. *Id.* The
28 Regional Board did not formally approve this work plan until the November 18, 2016

1 Requirement for Submittal of Technical Reports. *Id.* ExxonMobil submitted a site assessment
2 report on October 20, 2014. *Id.* The Regional Board did not formally respond to this site
3 assessment report until the November 18, 2016 Requirement for Submittal of Technical Reports.
4 *Id.* Finally, ExxonMobil submitted a revised public participation plan on November 14, 2014.
5 *Id.* The Regional Board did not formally respond to this plan until the November 18, 2016
6 Requirement for Submittal of Technical Reports. *Id.* In summary, after a two-year period of
7 discussion with the Regional Board, ExxonMobil is now being asked to undertake work for which
8 it is has shown clearly that it is not the discharger or the Responsible Party. Only a stay of these
9 November 2016 directives can prevent ExxonMobil from being unfairly prejudiced by being
10 required to undertake work for which it is not responsible.

11 As is detailed in this petition, there are substantial questions of law and fact regarding the
12 Regional Board's issuance of the Requirement for Submittal of Technical Reports to ExxonMobil
13 that justify the issuance of a stay. Racioppi Decl. ¶ 4.

14 **XIII. STATEMENT OF ADDITIONAL EVIDENCE**

15 To the extent additional evidence becomes available that was not previously presented to
16 the Regional Board, pursuant to CCR Title 23, Section 2050.6, ExxonMobil will request that it be
17 permitted to supplement the record before the State Board, and ExxonMobil will advise the State
18 Board more specifically regarding the nature of the evidence and facts to be presented and why
19 such evidence was not previously submitted.

20
21 Respectfully Submitted,

22
23 Dated: December 19, 2016

NORTON ROSE FULBRIGHT US LLP
ELIZABETH M. WEAVER
LAUREN A. SHOOR

24
25
26 By 
ELIZABETH M. WEAVER
Attorneys for Respondent
EXXONMOBIL OIL CORPORATION

Los Angeles Regional Water Quality Control Board

November 18, 2016

Ms. Marla Madden
ExxonMobil Environmental Services Co.
8941 Atlanta Avenue, # 384
Huntington Beach, CA 92646

RETURN MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7015 3010 0001 9147 4092

SUBJECT: REQUIREMENT FOR SUBMITTAL OF TECHNICAL REPORTS, PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER DATED AUGUST 24, 2010

SITE: FORMER EXXONMOBIL JALK FEE PROPERTY, 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CA (SCP NO. 0203, SITE ID NO. 1848000)

Dear Ms. Madden:

The Los Angeles Regional Water Quality Control Board (Regional Board) in the California Water Code (CWC) section 13267 order (Order) dated August 24, 2010 directed ExxonMobil Environmental Services Company (EMES) to conduct groundwater investigations to define the lateral and vertical extent of groundwater contamination originating from the site, and required the submittal of a work plan for further groundwater investigation. Consequently, a work plan was submitted, approved, and implemented. Based on the results of soil and groundwater sampling, the Regional Board in the December 21, 2011 amendment to the Order, directed EMES to conduct soil matrix, soil vapor, and groundwater investigations to adequately define the vertical and lateral extent of volatile organic compounds (VOCs) originating from or encountered at the site.

Subsequently, the Regional Board required EMES to submit a revised work plan for indoor air assessment, a site assessment report, and a revised public participation plan, pursuant to the February 18, 2014 amendment to the Order, the March 25, 2014 amendment to the Order, and the April 3, 2014 amendment to the Order, respectively.

The Regional Board received and reviewed the following submittals, prepared and submitted by Cardno ERI, on behalf of EMES for the referenced site:

- November 14, 2014, *Addendum to Work Plan for Indoor Air Assessment*
- October 20, 2014, *Site Assessment Report*
- November 14, 2014, *Revised Public Participation Plan*

I. ADDENDUM TO WORK PLAN FOR INDOOR AIR ASSESSMENT (WORK PLAN)

1. SUMMARY

- A. Indoor air assessments are proposed at two on-site commercial buildings (10629 Norwalk Boulevard, and 10628 Fulton Wells Avenue), and one off-site commercial building (10701 Norwalk Boulevard).

- B. Indoor and outdoor sampling locations are specified, based on inspections conducted at the three referenced buildings. Indoor and outdoor samples will be collected in 6-Liter Summa canisters and analyzed for VOCs. Samples will be collected during two separate sampling events, planned for the summer and winter.
- C. Evaluations are proposed on the potential human health risks via vapor intrusion. Results of the sampling events will be used on the evaluations.

2. REGIONAL BOARD RESPONSE

The California Office of Environmental Health Hazard Assessment (OEHHA) reviewed the Work Plan and provided comments in a memorandum (attached). Based upon review of the information submitted in the Work Plan and the comments provided by OEHHA, the Regional Board approves the scope of work with the following comments and additions:

- A. The purpose of the proposed sampling on the second floor of the buildings located at 10628 Fulton Wells Avenue and 10701 Norwalk Boulevard shall be justified. The proposed sampling on the second floor shall be conducted if validated reasons can be provided.
- B. Evaluations of the risk associated to vapor intrusion into indoor air shall be conducted using site-specific data for each proposed sampling event.
- C. A technical report summarizing the results of each sampling event and the respective vapor intrusion into indoor air evaluation shall be submitted to the Regional Board via GeoTracker by **September 29, 2017**. This report shall contain reasons for conducting sampling on the second floor, if applicable.

II. SITE ASSESSMENT REPORT

1. SUMMARY

- A. Four soil borings were advanced to a total depth of 60 feet below ground surface (bgs). Soil samples were collected at 5-foot intervals and analyzed for VOCs and total petroleum hydrocarbons (TPH).
- B. Seven multidepth soil vapor probes were installed. Probes were installed throughout the vadose zone at different depths. Soil vapor samples were collected and analyzed for VOCs and TPH.

2. REGIONAL BOARD RESPONSE

- A. Tetrachloroethene (PCE) was detected in a soil sample collected at approximately 10 feet bgs, at a concentration of 5,460 micrograms per kilogram in soil boring B22. This data indicates that the extent of VOCs is not fully defined in the immediate vicinity of B22.
- B. PCE was detected in soil vapor samples collected at approximately 5 feet, 15 feet, 60 feet, and 85 feet bgs, at concentrations of 340,000 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), 190,000 $\mu\text{g}/\text{m}^3$, 2,300,000 $\mu\text{g}/\text{m}^3$, and 3,200,000 $\mu\text{g}/\text{m}^3$, respectively, at soil vapor probe SVP8.

- C. To further define the extent of PCE concentrations in soil matrix in the vicinity of soil boring B22, and the extent of PCE concentrations in soil vapor in the vicinity of SVP8, you are required to prepare and submit a work plan for additional assessments. The work plan shall be submitted to the Regional Board via GeoTracker by **January 30, 2017**.

III. REVISED PUBLIC PARTICIPATION PLAN (PLAN)

1. SUMMARY

- A. The Plan provides information on the site description and background, list of stakeholders, participation strategy, and site map. The identified stakeholders are the current site property owners, site occupants, owners and occupants of ten properties located adjacent to the site, and the United States Environmental Protection Agency.
- B. A draft fact sheet provides information on historical information on the site and the adjacent off-site Continental Heat Treating facility, and upcoming indoor air sampling activities.

2. REGIONAL BOARD RESPONSE

- A. Since May 2015, the Regional Board has developed an updated list of information required to address public participation activities for sites/cases under the Site Cleanup Program. To properly update the material provided in the Plan, you are required to provide the following public participation information, consistent with California Water Code sections 13307.5 and 13307.6:
- a. Baseline community assessment
Provide information describing the demographics, and current and future land use scenario for the site and surrounding area within one-mile radius of the aerial extent of the groundwater contamination.
 - b. Interested persons contact list
Provide names and contact information for affected or potentially affected property owners, tenants, residents, or occupants within a 500-foot radius of the aerial extent of the groundwater contamination. Provide names and contact information for local, state, and federal government agencies that have jurisdiction over the site, and names and contact information for representatives of environmental groups and other interested persons, if known. This information is necessary for distribution of fact sheets.
 - c. Draft fact sheet
Provide an updated draft fact sheet to include the following site information: description, site history, summary of investigations and cleanup activities to date, wastes/contaminants encountered, description of any proposed/planned activities, upcoming investigation activities, information repositories, Regional Board contact information (Project Manager, Mr. Luis Changkuon, and Public Participation Specialist, Ms. Susana Lagudis), and an illustrative map of the site and immediate vicinity with the aerial extent of the primary contaminant in groundwater.

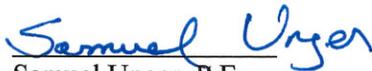
A fact sheet would be distributed with the Regional Board's logo to parties identified in item b above. Based on the information provided in the baseline community assessment, the fact sheet may have to be translated in a different language and distributed accordingly.

- B. The public participation information (technical report) shall be submitted to the Regional Board via GeoTracker by **February 15, 2017**.

The requirements for submittal of the three technical reports constitute an amendment to the requirements specified in the California Water Code (CWC) section 13267 Order originally dated August 24, 2010 (Order). All other aspects of the Order originally dated August 24, 2010, and the amendments thereto, remain in full force and effect. The required technical reports are necessary to investigate the characteristics of and extent of the discharges of waste at the site and to evaluate cleanup alternatives. Therefore, the burden, including costs, of the report bears a reasonable relationship to the need for the reports and benefits to be obtained. Pursuant to section 13268 of the CWC, failure to submit the required technical reports by the specified due date may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1,000) for each day each technical report is not received.

If you have any questions, please contact Mr. Luis Changkuon, Project Manager, at (213) 576-6667 or luis.changkuon@waterboards.ca.gov.

Sincerely,



Samuel Unger, P.E.
Executive Officer

Attachment: OEHHA memorandum dated January 13, 2015

cc: Mr. James Anderson, Cardno ERI
Mr. John Maple
Ms. Michelle F. Smith
Mr. Thomas Clark, Coast Aluminum and Architectural, Inc.
Mr. William Macnider, CSI Electric Contractors, Inc.
Mr. James Stull, Continental Heat Treating
Mr. Michael Francis, Demetriou, Del Guercio, Springer & Francis, LLP
Ms. Ashley Arthur/Mr. Howard Schwimmer, Rexford Industrial Realty, LP
Mr. Rick Fero, Fero Environmental Engineering, Inc.
Mr. Wayne Praskins, United States Environmental Protection Agency
Mr. Gene Lucero, Omega Chemical Site Potentially Responsible Parties Organized Group
Ms. Elizabeth Weaver, Norton Rose Fulbright US LLP

Office of Environmental Health Hazard Assessment

George V. Alexeeff, Ph.D., D.A.B.T., 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, 16th Floor • Oakland, California 94612



Matthew Rodriguez
Secretary for
Environmental Protection



Edmund G. Brown Jr.
Governor

MEMORANDUM

TO: Luis Changkuon
Engineering Geologist
Regional Water Quality Control Board, Los Angeles Region 320 West 4th
Street, Suite 200
Los Angeles, CA 90013

FROM: Nathalie T. Pham, Ph.D. 
Staff Toxicologist
Air Community and Environmental Research Branch

DATE: January 13, 2015

SUBJECT: ADDENDUM to WORK PLAN FOR INDOOR AIR ASSESSMENT – Former
Jalk Fee Property, 10607 Norwalk Boulevard, Santa Fe Springs, California

2015 JAN 20 PM 2 04
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

R4-14-38

OEHHA # 880332-01

Document reviewed

- Addendum to work plan for indoor air assessment, Former Jalk Fee Property, 10607 Norwalk Boulevard, Santa Fe Springs, California (November 14, 2014) by Cardno ERI.

Scope of the Review & Site Characterization

- The review evaluated the site-specific objectives vapor intrusion assessment through indoor air sampling. Samples must be handled in a manner to prevent loss prior to analysis and they must be analyzed by appropriate methods for toxic chemicals likely to be at the site based on site history.

Vapor Intrusion Risk Assessment

- The purpose of proposed indoor air sampling on the 2nd floors of the Coast Aluminum and Architectural and the Marco Awards buildings is unclear.
- Based on the comments of OEHHA's previous memo (December 2013), the indoor and outdoor sampling plan design is adequate.
- The contingency plan for indoor air sampling given by Cardno ERI is satisfactory.

California Environmental Protection Agency

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

Human Health Risk Assessment

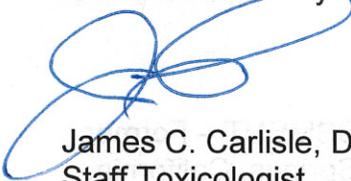
- A risk should typically be less than 1×10^{-6} for screening levels to have a “no further action” issuance (DTSC).
 - However, 1×10^{-5} may be acceptable for certain industrial scenarios depending on the risk manager.

Conclusions

- Uncertainties and limitations were sufficiently addressed.
- OEHHA agrees with the work plan proposed.

Please do not hesitate to contact me at (916) 327-7338 or by e-mail at Nathalie.Pham@oehha.ca.gov, if you have any questions related to this review.

Memo reviewed by:



James C. Carlisle, D.V.M., M.Sc.,
Staff Toxicologist

References

DTSC, 2011. Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance) Department of Toxic Substances Control, California Environmental Protection Agency, October, 2011.

US EPA, 2004. User's Guide for Evaluating Subsurface Vapor Intrusion into Buildings, Office of Emergency and Remedial Response, February 2004.

EXHIBIT 2

18685 Main Street, Suite 101 PMB 601
Huntington Beach, California 92648-1719
marla.d.madden@exxonmobil.com



March 25, 2015

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

SUBJECT Request to Name Continental Heat Treating as Discharger
Former ExxonMobil Jalk Fee Property
10607 Norwalk Boulevard
Santa Fe Springs, California
CRWQCB-LAR Case No. 0203; Site I.D. No. 1848000

Mr. Heath:

Enclosed for review is the report which summarizes the evidence presented by ExxonMobil Environmental Services Company (EMES) during the meeting held with representatives of the California Regional Water Quality Control Board – Los Angeles Region (CRWQCB-LAR) on March 3, 2015 regarding the above-referenced site. Cardno ERI prepared this report for EMES, on behalf of ExxonMobil US Production Company (ExxonMobil).

This report presents conclusive evidence that ExxonMobil could not be responsible for the chlorinated solvents present in the soil on the Jalk Fee property because ExxonMobil did not use chlorinated solvents during its operations on the Jalk Fee property, CHT used significant quantities of solvents in its degreasing operations from approximately 1969 to 1995, and CHT had poor operational practices as documented by various agency citations and notices of violation, which resulted in various discharges of solvents and other chemicals to the ground. Additionally, an updated site conceptual model is presented, which demonstrates that preferential pathways exist between the CHT and Jalk Fee properties and explains the migration of the chlorinated solvents from the CHT property to the Jalk Fee property.

Based on the evidence presented in this report, EMES, on behalf of ExxonMobil, requests that the CRWQCB-LAR identify CHT as the discharger and responsible party for the chlorinated solvents identified in the soil on the CHT, Jalk Fee and 10711 Norwalk Boulevard properties; rescind its Order dated August 24, 2010 requiring ExxonMobil to assess and monitor the extent of chlorinated solvents; and formally remove ExxonMobil as the named discharger and responsible party for the chlorinated solvents on the subject properties.

Please call the undersigned at (714) 964-4935 for any questions regarding the content of this document.

Sincerely,



Marla D. Madden
Project Manager

Attachment: **Request to Name Continental Heat Treating as Discharger, Former ExxonMobil Jalk Fee Property, 10607 Norwalk Boulevard, Santa Fe Springs, California, prepared by Cardno ERI.**

C: w/attachment:
Mr. Luis Changkuon, California Regional Water Quality Control Board – Los Angeles Region
Mr. Thomas Clark, Coast Aluminum and Architectural Inc./Clark Holdings, LLC, property owner
Mr. William Macnider, CSI Electrical Contractors, Inc., property owner
Ms. Michelle F. Smith, property owner
Mr. John Maple, property owner

C: w/o attachment:
Mr. James Anderson, Cardno ERI

Cardno ERI
License AC10-611383

4572 Telephone Road
Suite 916
Ventura, CA 93003
USA

Phone 805 644 4157
Fax 805 644 5610
www.cardno.com

www.cardnoeri.com

March 25, 2015
Cardno ERI 08115504.R17

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

SUBJECT Request to Name Continental Heat Treating as Discharger

Former ExxonMobil Jalk Fee Property
10607 Norwalk Boulevard
Santa Fe Springs, California
CRWQCB-LAR Case No. 0203; Site I.D. No. 1848000

Mr. Heath:

At the request of ExxonMobil Environmental Services Company (EMES), on behalf of ExxonMobil US Production Company (ExxonMobil), Cardno ERI has prepared this request to name Continental Heat Treating (CHT) as discharger for the above-referenced site (Plate 1). This report summarizes the evidence EMES presented to representatives of the California Regional Water Quality Control Board – Los Angeles Region (CRWQCB-LAR) on March 3, 2015, namely that ExxonMobil did not use chlorinated solvents on the Jalk Fee property and therefore could not be the discharger of the PCE identified in the soil beneath the subject site, and that CHT used extensive quantities of solvents in its degreasing operations from approximately 1969 to 1995, had poor operational practices that resulted in spills of solvents and other chemicals to the ground surface, and received various agency citations and notices of violation (NOVs) for releases of solvents and other chemicals. In addition, an updated site conceptual model was presented, which demonstrates the preferential pathways that allowed chlorinated solvents released from the CHT facility to migrate and be observed on the Jalk Fee property.

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The evidence presented by EMES is consistent with the same conclusions the CRWQCB-LAR has already reached, as demonstrated by the CRWQCB-LAR's letter dated June 23, 2010 to CHT (Appendix A). The CRWQCB-LAR stated that significant quantities of PCE were stored and used by CHT, that primary sources of PCE contamination (degreaser, storage area, etc.) have been identified at the CHT property, that releases of chlorinated solvents at CHT have impacted the subsurface, that the pipe trench leading from the degreaser to the north end of the building may have created a potential preferential pathway for the migration of PCE, and that no primary sources of PCE contamination have been identified on the Jalk Fee property.

Therefore, EMES, on behalf of ExxonMobil, requests that the CRWQCB-LAR review the evidence and identify CHT as the discharger and responsible party for the chlorinated solvents identified in the soil on the CHT, Jalk Fee and 10711 Norwalk Boulevard properties; rescind its Order dated August 24, 2010 requiring ExxonMobil to assess and monitor the extent of chlorinated solvents; and formally remove ExxonMobil as the named discharger and responsible party for the chlorinated solvents on the subject properties.

The following sections will present documentation demonstrating that 1) there is no primary source of chlorinated solvents on the Jalk Fee property, 2) CHT used and stored significant quantities of chlorinated solvents, 3) CHT is the source of chlorinated solvents based on the history of spills and releases as documented from various agency inspections and NOVs, and 4) preferential pathways exist between the CHT and Jalk Fee properties, which explain the migration of the chlorinated hydrocarbons in soil from the CHT property to the Jalk Fee property.

HISTORY OF JALK FEE PROPERTY

The Jalk Fee property was used as an oil field from approximately the 1920s until 1996. It was originally operated by ExxonMobil, and later leased and operated by Hathaway Oil Company (Hathaway). In the 1990s, ExxonMobil and Hathaway ceased oil production and removed the infrastructure from the site.

ExxonMobil owned the property during its time of use as an oil field. In 2001, ExxonMobil sold the property to SFS Norwalk. In 2003, the property was developed with paved parking and several industrial buildings, and remains in the same configuration today. The businesses on the eastern half of the property are Coast Aluminum and Architectural Inc. and Contents Restorers of California, and based on interviews with their management conducted during building inspections associated with the preparation of Cardno ERI's *Addendum to Work Plan for Indoor Air Assessment* dated November 14, 2014 for the subject site, the businesses are not known to have used chlorinated solvents in their operations.

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From the 1920s until its redevelopment in 2003, the Jalk Fee property had a dirt surface and was unpaved, as can be observed in the historical aerial photos, which would allow rainwater and spills/releases from the adjacent paved CHT property to run off onto and infiltrate into the upper vadose zone of the Jalk Fee property (see Plate 1 and Appendix B for the historical aerial photos).

ExxonMobil has had internal discussions with its personnel who managed oil field operations at various locations, who confirmed that chlorinated solvents were not standard chemicals used in its oil field production operations. This is reinforced by the CRWQCB-LAR's letter dated June 23, 2010 to CHT, which stated that the "Jalk Fee property was used for oil production operations and no primary sources(s) of PCE contamination have been identified [on the property]" (Appendix A). Additionally, file reviews conducted with the City of Santa Fe Springs and the County of Los Angeles did not identify agency records or NOVs, indicating that chlorinated solvents were stored, used or released onto the Jalk Fee property (Appendix C).

In 2014, Cardno ERI conducted a review of the State Water Resources Control Board's online GeoTracker information database of various oil field sites across the State of California that had current or closed environmental cases, and was unable to identify any oil field site that had chlorinated solvents as a contaminant of concern. Additionally, Cardno ERI spoke with representatives of the County of Santa Barbara Environmental Health Services and the California Regional Water Quality Control Board – Central Valley Region, which are agencies that have extensive oil field operations and clean-up projects in their areas of responsibility, and the representatives from both agencies were not aware of any oil field sites within their jurisdictions that had chlorinated solvent contamination.

Levine-Fricke's report dated December 6, 1991 claims that a tenant of Mobil who rented the Jalk Fee property may have used chlorinated solvents on the eastern portion of the property (Levine-Fricke, 1991). The report doesn't cite any source evidence for this statement, and ExxonMobil is unaware of any information that supports this claim. Further, ExxonMobil has conducted extensive reviews of its lease files and has no record that any company or person rented the property during its period of operation or ownership, other than Hathaway. As stated previously, Hathaway was an oil production company, and oil field operators did not use solvents as standard chemicals. Thus, there is no evidence that ExxonMobil, a tenant, or the subsequent property owners and their tenants ever used chlorinated solvents on the property. Therefore, there is no primary source of chlorinated solvents from historical operations on the Jalk Fee property, and the chlorinated solvents in soil must be from an off-site source.

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HISTORY OF CHT PROPERTY

The building that is currently present at the CHT property was constructed in 1969, at which time the majority of the property would also have been paved for parking, as is apparent in aerial photographs of the site (Appendix B). Based on information provided by CHT, since commencing operations at the site, the CHT business has cleaned metal parts and processed them with heat. This process requires the cleaning of the metal parts to remove cutting oils and debris, which was performed by placing the metal parts in a solvent-based vapor degreaser. Thus CHT conducted degreasing operations and used chlorinated solvents from approximately 1969 to 1995, as supported by the following documentation.

- Blueprints obtained from the City of Santa Fe Springs file dated 1968 identify a Detrex degreaser (Item #19) in the eastern area of the building (Appendix D).
- The 1968 blueprints also identify a 'degreaser – future' (Item #81), located 50 feet south of the north building wall, and 200 feet west of the east building wall (Appendix D).
- A City of Santa Fe Springs Industrial Waste Survey dated December 12, 1969, which indicated CHT was doing metal degreasing (Appendix E).
- A City of Santa Fe Springs Industrial Waste Disposal Permit issued to CHT and dated January 20, 1970, which includes discharge to the sewer of "wastes from...degreasing metals" (Appendix F).
- An inspection report of April 5, 1982, referenced in McLaren Hart's September 23, 1993 letter, noted in the Special Hazards and Conditions section that a degreaser was present in northeast portion of the building (Appendix G).
- A County of Los Angeles survey report dated March 16, 1984, which identifies that 150 gallons per month of PCE were being used and stored in drums. The report also identifies the use of 1,1,1-trichloroethane at the property, which was another chlorinated solvent commonly used for metal degreasing (Appendix H).
- A County of Los Angeles survey report dated May 19, 1989, which identifies that CHT is conducting degreasing using PERC (another name for PCE); generating 2,200 gallons of PERC per year; storing the PERC in 55 gallon containers, presumed to be drums; disposing of 400 gallons of PERC; and conducting parts wiping, with the excess rags containing oil and solvent stored in covered cans (Appendix I).
- An attachment from a letter from CHT to Mobil Exploration & Producing U.S., Inc. (Mobil) dated July 30, 1993 is a diagram of the CHT facility, which shows a degreaser at the western edge of the CHT building (Appendix J).
- A Los Angeles County Fire Department Request for Service dated November 4, 1993 for the CHT property, which states, "possible illegal discharge into subsurface from PCE metal degreaser" (Appendix K).
- A Los Angeles County Fire Department Health Hazardous Materials Division Industry Survey dated October 6, 1994, which has a hand-drawn map that identifies the 'position of old degreaser' inside the

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building, and a second hand-drawn map showing a waste storage area for 200 gallons of PCE ('accum containment 12" concrete w/ roof PERC 200 G') on the property. The bottom hand-drawn map has "South" written towards the top of the map, placing the waste storage area in the southwest area of the CHT property, which is consistent with other documentation of the storage location at the property. Although the upper hand-drawn map does not have an indicated directional orientation, it is logical to assume that it was drawn in the same orientation as the lower map. Additionally, the hand-drawn 'area 12X12' to the right of the building in the document would be in the sidewalk or street if the map orientation were north to the top, whereas it would be inside the property in a south to the top orientation, providing further support that the two maps have the same south to the top of page orientation. Based on this, the 'old degreaser' is 40 feet west of the east wall of the building and in close proximity to the northern wall of the building (Appendix L).

- An undated Los Angeles County Fire Department Small Quantity Generator Contingency Plan, which indicates that a 200-gallon tank is being used to store PCE, and 300 gallons of waste PCE are being stored in drums (Appendix M).
- A Los Angeles County Fire Department Case Synopsis dated October 19, 1995 for the CHT Project, which states, "Eventually the old location of the degreaser was established. It appeared this old location was close enough to the northern property line..." (Appendix N).

As shown in these building records, CHT performed vapor degreasing at the property from approximately 1969 through 1995, which necessitated the storage of hundreds of gallons of chlorinated solvents at any time on the property and the generation of significant quantities of waste solvent, such as 2,200 gallons per year in the 1989 record. Over this 26-year operational period, the records show that CHT had one degreaser in the eastern portion of the building (Detrex #19); a second degreaser in the central portion of the building (Item #81), which is the location that is most consistent with depictions in the reports submitted by CHT to the CRWQCB-LAR; a third degreaser along the western end of the building; and possibly even a fourth degreaser at an unidentified location along the northern edge of the building.

In addition to the degreasing operations inside the building and the storage of waste PCE in the southwestern area of the property, it also appears that CHT utilized the northwestern portion of the property as an equipment storage and repair area based on review of the historical aerial photos and several reports (Appendices B and O). Given that storage and repair of equipment occurred in this area of the site, it is likely that the cleaning of parts also occurred here, which is directly adjacent to the area of the Jalk Fee property where the highest PCE concentrations have been observed (Plate 1).

Regulatory oversight and inspections started to become more common in the late 1970s and early 1980s. These regulatory inspections demonstrate that CHT's practices resulted in numerous documented releases and spills to

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the ground throughout its operations at the property. The various inspections, investigation reports and violations are summarized below and documented in Appendices G, I, N and P through AC.

- A County of Los Angeles Project Planning and Pollution Control Division Notice dated July 11, 1978 and issued to CHT, which states, “you are hereby instructed to clean the interceptor...also maintained [maintain] the interceptor in good operating condition at all times.” At the bottom of the notice is a hand written note, “Violation Corrected 7/27/78.” (Appendix P)
- A County of Los Angeles Department of Health Services Official Notice of Violation dated March 16, 1984 issued for the property at 10643 South Norwalk, where CHT is located, which requires, “you are hereby directed to remove oil from ground in rear storage area” (Appendix Q).
- An Investigation Worksheet dated December 8, 1986 from the City of Santa Fe Springs Public Works Department, which is investigating a complaint that CHT “is discharging industrial waste over the driveway.” The report further identifies that “water with vivid blue-green streaks of color was flowing at several gallons per hour into Norwalk Blvd. from Continental’s cooling tower area” (Appendix R).
- McLaren Hart’s *Perchloroethylene (PCE) and Heavy Metals in Soil at the Jalk Lease* letter dated September 23, 1993, which identifies that three fires occurred in CHT’s degreasing equipment, all of which could have resulted in the release of solvents from the degreasing equipment (Appendix G).
 - Degreaser Tank Fire (Code 6205) – 10/2/87
 - Fire in Degreaser (Code 6225) – 4/9/88
 - Fire in Degreaser (Code 6229 – 8/1/88
- An Investigation Worksheet dated October 5, 1987 from the City of Santa Fe Springs, which is investigating a complaint of “blue-green water being discharged to the street” and identifies that “the recent earthquake (10/04/87) had broken several pieces of equipment at this site and a discharge similar to that of 12/08/86 was occurring” (Appendix S).
- An Investigation Worksheet dated February 23, 1988 from the City of Santa Fe Springs, which is investigating a complaint of “discharging I.W. [industrial waste] to street.” The worksheet also states “Notice of Violation #0060 was given” (Appendix T).
- A County of Los Angeles Department of Health Services Notice of Violation and Order to Comply dated May 19, 1989 and issued to CHT to 1) “Discontinue the disposal of hazardous waste to an unauthorized point(s)...any waste oil onto the ground”; 2) “Store all hazardous waste in compatible containers which are closed and in good condition...keep lids and bungs on, don’t overfill”; 3) Remove and legally dispose of oily surface in rear asphalted yard...discharge of oil waste both onto asphalt top and onto soil (SW corner or rear yard)”; 4) Unlabeled barrels that Mr. Bastian indicated contained either PERC or waste oil”; and 5) “Facility has a continuing problem with mineral oil disg [sic] out on the asphalted area” (Appendix U).

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- A County of Los Angeles Department of Health Services survey report dated May 19, 1989, with remark of “Apparent motor oil discharge(s) with one auto-type oil filter on ground SW corner” (Appendix I).
- A County of Los Angeles Fire Department Order to Comply dated October 6, 1994, which required “Provide a corrective action plan for unauthorized releases of hazardous waste or constituents – evaluate the area vicinity 120’ W. of the east wall and 30’ S. of the north wall for soil contamination by chlorinated hydrocarbon solvent” (Appendix V).
- A Los Angeles County Fire Department Case Synopsis dated October 19, 1995 for the CHT site in which the agency case worker wrote, “Eventually the old location of the degreaser was established. It appeared this old location was close enough to the northern property line that leaks, sloppy operations or spills could have migrated offsite despite employees’ statements to the contrary...A single boring to a depth of 10’ immediately adjacent but exterior to the concrete sump of the old industrial vapor degreaser was proposed.” The soil sample collected at 6 inches in depth indicated PCE and TCE concentrations of 7.514 and 4.759 mg/kg, respectively. (Appendix N)
- A City of Santa Fe Springs Fire Department Inspection Report & Notice of Violation dated May 25, 2006, for “Continental Heat Treating violated City Ordinance...by having oil in the 3rd stage of their clarifier. Oil must be removed from the clarifier and maintained such that oil is kept out of the sewer system” (Appendix W).
- A City of Santa Fe Springs Fire Department Inspection Report & Notice of Violation dated May 9, 2007, for “Continental Heat Treating violated City Code...by failing to maintain pretreatment equipment in good working order. The third stage of the clarifier had oil in it. Continental Heat Treating must maintain the clarifier to prevent oil from entering the sewer system” (Appendix X).
- A City of Santa Fe Springs Fire Department Inspection Report & Notice of Violation dated May 8, 2012, for “Continental Heat Treating violated...by not maintaining industrial waste pretreatment equipment. There was oil in the clarifier.” (Appendix Y).

As documented by these agency inspection reports and NOVs, the limited periodic agency visits to the site over the past three decades have documented numerous instances of chemical releases onto the ground at the property.

SUBSURFACE TRANSPORT MECHANISM/SITE CONCEPTUAL MODEL

The agency inspection records and NOVs demonstrate that CHT’s operational practices caused numerous chemical spills to both the asphalted and soil surface on the CHT property. The following section will demonstrate that two subsurface transport mechanisms were present, which resulted in the movement of chlorinated solvents from the CHT property to the Jalk Fee property.

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First, the 1968 blueprints identify subsurface pipe trenches running between the two degreasers and various pieces of equipment within the building. Most significantly, one pipe trench branches off the east-west pipe trench that connects to degreaser #19, runs to the north, and terminates outside of the CHT building near the Jalk Fee property boundary. A second pipe trench runs north from degreaser #81 and terminates at the northern edge of the CHT building. It is unclear from the blueprints if the northern ends of the two pipe trenches are connected to anything, or what type of piping was contained within the trenches. Regardless, based on standard construction methods, the utility trenches would have been backfilled with sand or other similar material that would have a higher permeability than the surrounding soil. Therefore, these trenches would provide a preferential pathway directly from the degreasers to the northern edge of the CHT building and the southern boundary of the Jalk Fee property, allowing the migration of chlorinated solvent vapors (Appendix D). The CRWQCB-LAR reached much the same conclusion in its letter to CHT dated June 23, 2010 (Appendix A).

Second, extensive assessment has been conducted in the southeastern portion of the Jalk Fee property and the northwestern portion of the CHT property, which has allowed for a thorough understanding of the near surface vadose zone lithology between the two properties. Two cross-sections were generated for the area to the west of the CHT building and surrounding Jalk Fee well MW6, where the maximum PCE concentrations have been detected on the Jalk Fee property (Appendix Z, Figures 5.1.1 and 5.1.2). In addition, plan view figures of the distribution of low (clay/silt) and high permeability soils (sand) at 6, 10 and 16 feet bgs of the CHT and Jalk Fee property boundary area show that a laterally continuous, shallow, low permeability silt/clay layer is present under much of the CHT property (Appendix AA, Figures 5.2.1, 5.2.2 and 5.2.3). This silt/clay layer starts to dip along the northern part of the CHT property and continues to dip northward onto the Jalk Fee property to a depth of 15 to 16 feet bgs. Soil above the silt/clay layer on the northern CHT property and on the Jalk Fee property is generally characterized as sand. It should be remembered that the Jalk Fee property was unpaved and essentially an open field until 2003. Therefore, chlorinated solvents released by CHT along the northern portion of the CHT property or directly released onto the Jalk Fee property would infiltrate downward through the higher permeability surface sand until reaching the low permeability unit and then would migrate along the northward dipping contact between the high and low permeability units onto the Jalk Fee property.

The figures in Appendix AA also show the soil samples collected during the assessment activities in the southern portion of the Jalk Fee property and the northern portion of the CHT property, which have total chlorinated solvent concentrations greater than 1,000 mg/kg at 6, 10 and 16 feet bgs. The figures in Appendix AB (Figures 5.3.1 and 5.3.2) show plan view and vertical distributions of the total chlorinated solvent concentrations in proximity to the property boundary between the two sites. Most notably, elevated concentrations of chlorinated solvents are located at a shallow depth on, or immediately adjacent to the CHT boundary (Areas 1, 2 and 3 on Figures 5.3.1 and 5.3.2). However, near the northwest corner of the CHT building, elevated total chlorinated solvent concentrations occur

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further onto the Jalk Fee property in a narrow northwest trending band, with elevated concentrations becoming deeper with distance from the CHT property boundary. Specifically, chlorinated solvents were measured in soil at concentrations from south to north of 2,517 mg/kg at 4 feet bgs at location T9A-1A (a trench excavation sample located 10 feet north of the property boundary), 350.8 mg/kg at 15 feet bgs at location EX2-26 (an excavation verification sample collected 30 feet north from the property line), and 59,800 mg/kg at 15 feet bgs at location GP-6 (a geoprobe sample located 45 feet north of the property boundary) (Appendix AC). These samples all occurred in sand, and the two samples collected at a depth of 15 feet bgs are located at the contact between the sand and clay/silt units. Specifically, sample EX2-26 is located along a sand-clay/silt basal contact, and the GP-6 sample from 15 feet bgs is located at a sand-clay/silt lateral contact. The relationship between the stratigraphic contacts and the distribution of elevated chlorinated solvent concentrations suggests that the solvent-containing soil in this area is derived from a lateral transport mechanism. This is further supported by the soil samples collected in the vicinity of location GP-6, which are significantly lower in total chlorinated solvent concentrations. Specifically, the two samples collected from location GP-6 at shallower depths (5 and 10 feet bgs) had total chlorinated solvent concentrations of 0.33 mg/kg and 0.021 mg/kg, respectively, and the soil sample collected above sample EX2-26 at 6 feet bgs [sample EX2-26(A)] had a total chlorinated solvent concentration of 0.715 mg/kg (Appendix AC). This distribution pattern indicates that surface releases of chlorinated solvents were not occurring in these areas, as surface releases would have resulted in similar to higher concentrations of chlorinated solvents with residual saturation in the shallower soil samples. Furthermore, the presence of the elevated shallow detections abutting the CHT-ExxonMobil property line supports that chlorinated solvent release(s) occurred in the vicinity of the property line and transport occurred to the north onto the Jalk Fee property. This transport was likely facilitated by runoff from the CHT property (including roof runoff from the CHT building), which caused the movement of chlorinated solvents away from the property line onto the Jalk Fee property.

ExxonMobil historically has conducted several remedial excavations on the Jalk Fee site to facilitate the sale and redevelopment of the property, which are depicted on Plate 2. Any soil samples discussed above from the excavation areas are pre-excavation samples or confirmatory samples taken from the base and sides of the excavations. The two largest and most northerly excavation areas on the Jalk Fee property, under the current Contents Restorers of California building, were excavated to a maximum depth of 19 feet bgs; TPH-containing soil was removed, and PCE was not detected in the verification samples, with the exception of only one sample (JF-M3-S35-NW-13 collected from excavation M3 at 0.27 mg/kg). The three excavations that extended along and close to the CHT property boundary went as deep as 15 feet bgs, and both TPH and elevated PCE concentrations were measured in the pre-remediation and/or verification samples. (Appendix AC)

Elevated concentrations of total petroleum hydrocarbons and chlorinated hydrocarbons, however, are generally not co-located across the majority of the Jalk Fee site (Appendix AD, Figure 4.6). For example, the TPH

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concentrations in the northern excavation areas do not contain chlorinated solvents, whereas several of the near surface soil samples collected in the vicinity of the property line contain both elevated TPH and chlorinated solvents. Although the soil samples in the vicinity of the property line contain both chlorinated solvents and TPH, the respective concentrations are generally both low, or with either PCE or TPH significantly higher in concentration than the other constituent. These results reinforce the site conceptual model in which chlorinated solvents from CHT released along the northern portion of the CHT property or directly onto the Jalk Fee property infiltrated downward through the higher permeability surface sand, until reaching the low permeability unit, and then migrated along the northward dipping contact between the high and low permeability units onto the Jalk Fee property.

SUMMARY AND CONCLUSIONS

As the CRWQCB-LAR has already acknowledged and demonstrated with its letter dated June 23, 2010, CHT is the only primary source of chlorinated solvents on the CHT and Jalk Fee properties.

- There are no primary sources of PCE on the Jalk Fee property as chlorinated solvents are not typically used in oil field activities, no evidence of PCE use at the Jalk Fee property has been identified, and other CA regulatory agencies and GeoTracker do not identify chlorinated solvent contamination at other oil field properties.
- The surface of the Jalk Fee property was unpaved soil until the property was redeveloped in 2003, allowing surface spills and precipitation to migrate downward.
- CHT had several primary sources of chlorinated solvents including multiple degreasers within its building, storage areas, and the northwestern area of the site where equipment storage and repairs were likely conducted.
- CHT used significant quantities of chlorinated solvents for degreasing operations from approximately 1969 through 1995, including 2,200 gallons a year in 1989.
- Inadequate operational and housekeeping practices by CHT resulted in numerous releases/spills of chlorinated solvents and other chemicals, which were identified during infrequent agency inspections, resulting in various NOVs.
- Several pipe trenches led from the degreasers to the northern edge of the building and property line, which had higher permeable backfill and would have been preferential pathways for the migration of chlorinated solvent vapor from the CHT building to the Jalk Fee property.
- Assessment activities have identified that a low permeability silt/clay unit is present in the near surface vadose zone between both properties and generally dips to the north, providing an additional preferential pathway for subsurface chlorinated solvents to migrate along the contact plane from the CHT property onto the Jalk Fee property.

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- The distribution pattern of subsurface PCE indicates that the PCE was released at the surface from CHT at or adjacent to the property boundary and then migrated vertically to deeper depths and laterally to the north onto the Jalk Fee property.

Based on the evidence provided, it has been demonstrated that CHT is the source of the chlorinated solvents observed in soil beneath the CHT, Jalk Fee and 10711 Norwalk Blvd properties. Therefore, EMES, on behalf of ExxonMobil, requests that the CRWQCB-LAR identify CHT as the discharger and responsible party for the chlorinated solvents identified on the CHT, Jalk Fee and 10711 Norwalk Boulevard properties; rescind its Order dated August 24, 2010 requiring ExxonMobil to assess and monitor the extent of chlorinated solvents; and formally remove ExxonMobil as the named discharger and responsible party for the chlorinated solvents.

LIMITATIONS

For documents cited that were not generated by Cardno ERI, the data taken from those documents is used "as is" and is assumed to be accurate. Cardno ERI does not guarantee the accuracy of this data and makes no warranties for the referenced work performed nor the inferences or conclusions stated in these documents.

This document and the work performed have been undertaken in good faith, with due diligence and with the expertise, experience, capability and specialized knowledge necessary to perform the work in a good and workmanlike manner and within all accepted standards pertaining to providers of environmental services in California at the time of investigation. No soil engineering or geotechnical references are implied or should be inferred. The evaluation of the geologic conditions at the site for this investigation is made from a limited number of data points. Subsurface conditions may vary away from these data points.

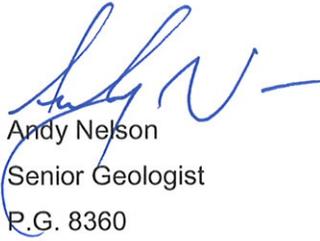
March 25, 2015
Cardno ERI 08115504.R17 Former ExxonMobil Jalk Fee Property, Santa Fe Springs, California

For questions concerning this report, please contact Mr. James Anderson at 805 644 4157, extension 181805.

Sincerely,



James Anderson
Senior Engineer
for Cardno ERI
Direct Line 805 644 4157, ext. 181805
Email: james.anderson@cardno.com



Andy Nelson
Senior Geologist
P.G. 8360
for Cardno ERI
Direct Line 805 644 4157, ext. 181809
Email: andy.nelson@cardno.com



Enclosures:

References

Acronym List

Plate 1 Generalized Site Plan

Plate 2 Excavation Area Location Map

- Appendix A June 23, 2010 CRWQCB-LAR Response to Letter Dated May 19, 2010
- Appendix B 1956-2005 Aerial Photos
- Appendix C Public Agency Records Requests and Response for Jalk Fee Property
- Appendix D August 20, 1968 CHT Blueprints
- Appendix E December 12, 1969 City of Santa Fe Springs Industrial Waste Survey
- Appendix F January 20, 1970 City of Santa Fe Springs Industrial Waste Disposal Permit
- Appendix G September 23, 1993 McLaren Hart PCE and Heavy Metals in Soil at the Jalk Lease Letter
- Appendix H March 16, 1984 County of Los Angeles Survey Report
- Appendix I May 19, 1989 County of Los Angeles Survey Report
- Appendix J Map of CHT Building from CHT Letter to ExxonMobil
- Appendix K November 4, 1993 Los Angeles County Fire Department Request for Service
- Appendix L October 6, 1994 Los Angeles County Fire Department Health Hazardous Materials Division Industry Survey

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Appendix M	Undated Los Angeles County Fire Department Small Quantity Generator Contingency Plan
Appendix N	October 19, 1995 Los Angeles County Fire Department Case Synopsis
Appendix O	Previous Consultant's Maps Showing Equipment Storage and Repair Area at CHT Property
Appendix P	July 11, 1978 County of Los Angeles Project Planning and Pollution Control Division Notice
Appendix Q	March 16, 1984 County of Los Angeles Department of Health Services Official Notice of Violation
Appendix R	December 8, 1986 City of Santa Fe Springs Public Works Investigation Worksheet
Appendix S	October 5, 1987 City of Santa Fe Springs Public Works Investigation Worksheet
Appendix T	February 23, 1988 City of Santa Fe Springs Public Works Investigation Worksheet
Appendix U	May 19, 1989 County of Los Angeles Department of Health Services Notice of Violation and Order to Comply
Appendix V	October 6, 1994 County of Los Angeles Fire Department Order to Comply
Appendix W	May 25, 2006 City of Santa Fe Springs Fire Department Inspection Report & Notice of Violation
Appendix X	May 9, 2007 City of Santa Fe Springs Fire Department Inspection Report & Notice of Violation
Appendix Y	May 8, 2012 City of Santa Fe Springs Fire Department Inspection Report & Notice of Violation
Appendix Z	January 2014 NewFields Figures 5.1.1-5.1.2
Appendix AA	January 2014 NewFields Figures 5.2.1-5.2.3
Appendix AB	January 2014 NewFields Figures 5.3.1-5.3.2
Appendix AC	CHC Calculations and Previous Consultants' Soil Data
Appendix AD	January 2014 NewFields Figure 4.6

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Cardno ERI 08115504.R17 Former ExxonMobil Jalk Fee Property, Santa Fe Springs, California

REFERENCES

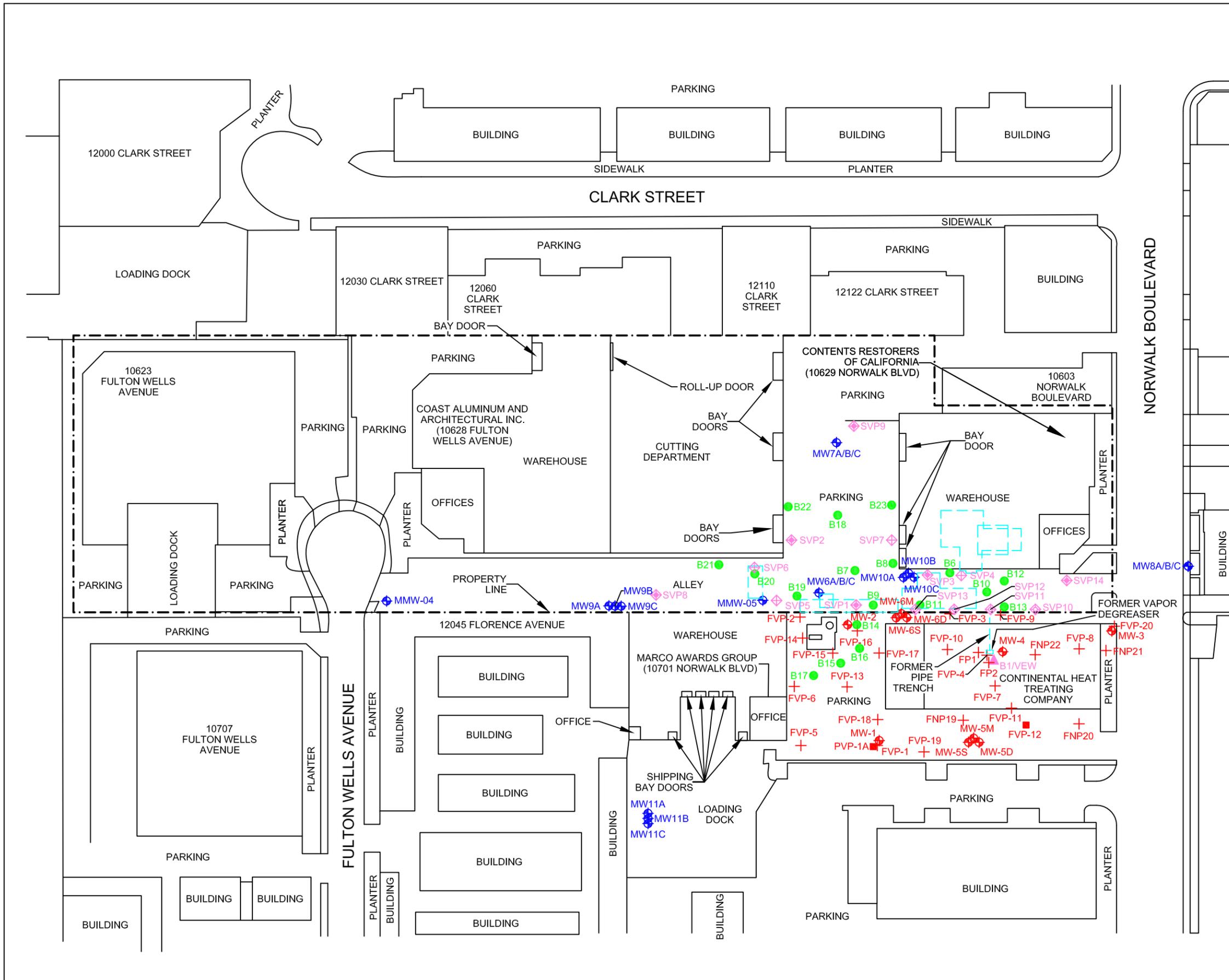
Levine-Fricke. December 6, 1991. *Subsurface Soil Investigation – Draft*, Jalk Fee Property, 10607 Norwalk Boulevard, Santa Fe Springs, California.

March 25, 2015

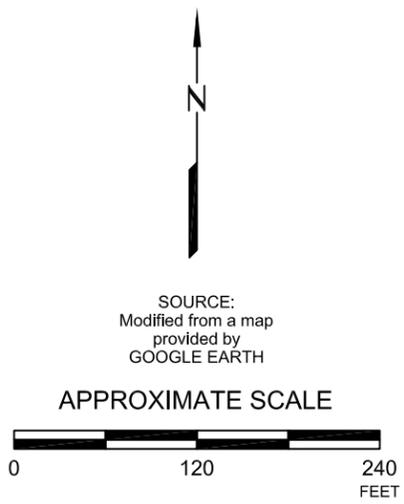
Cardno ERI 08115504.R17 Former ExxonMobil Jalk Fee Property, Santa Fe Springs, California

ACRONYM LIST

µg/L	Micrograms per liter	NEPA	National Environmental Policy Act
µs	Microsiemens	NGVD	National Geodetic Vertical Datum
1,2-DCA	1,2-dichloroethane	NPDES	National Pollutant Discharge Elimination System
acfm	Actual cubic feet per minute	O&M	Operations and Maintenance
AS	Air sparge	ORP	Oxidation-reduction potential
bgs	Below ground surface	OSHA	Occupational Safety and Health Administration
BTEX	Benzene, toluene, ethylbenzene, and total xylenes	OVA	Organic vapor analyzer
CEQA	California Environmental Quality Act	P&ID	Process & Instrumentation Diagram
cfm	Cubic feet per minute	PAH	Polycyclic aromatic hydrocarbon
COC	Chain of Custody	PCB	Polychlorinated biphenyl
CPT	Cone Penetration (Penetrometer) Test	PCE	Tetrachloroethene or perchloroethylene
DIPE	Di-isopropyl ether	PID	Photo-ionization detector
DO	Dissolved oxygen	PLC	Programmable logic control
DOT	Department of Transportation	POTW	Publicly owned treatment works
DPE	Dual-phase extraction	ppmv	Parts per million by volume
DTW	Depth to water	PQL	Practical quantitation limit
EDB	1,2-dibromoethane	psi	Pounds per square inch
EPA	Environmental Protection Agency	PVC	Polyvinyl chloride
ESL	Environmental screening level	QA/QC	Quality assurance/quality control
ETBE	Ethyl tertiary butyl ether	RBSL	Risk-based screening levels
FID	Flame-ionization detector	RCRA	Resource Conservation and Recovery Act
fpm	Feet per minute	RL	Reporting limit
GAC	Granular activated carbon	scfm	Standard cubic feet per minute
gpd	Gallons per day	SSTL	Site-specific target level
gpm	Gallons per minute	STLC	Soluble threshold limit concentration
GWPTS	Groundwater pump and treat system	SVE	Soil vapor extraction
HVOC	Halogenated volatile organic compound	SVOC	Semivolatile organic compound
J	Estimated value between MDL and PQL (RL)	TAME	Tertiary amyl methyl ether
LEL	Lower explosive limit	TBA	Tertiary butyl alcohol
LPC	Liquid-phase carbon	TCE	Trichloroethene
LRP	Liquid-ring pump	TOC	Top of well casing elevation; datum is msl
LUFT	Leaking underground fuel tank	TOG	Total oil and grease
LUST	Leaking underground storage tank	TPHd	Total petroleum hydrocarbons as diesel
MCL	Maximum contaminant level	TPHg	Total petroleum hydrocarbons as gasoline
MDL	Method detection limit	TPHmo	Total petroleum hydrocarbons as motor oil
mg/kg	Milligrams per kilogram	TPHs	Total petroleum hydrocarbons as stoddard solvent
mg/L	Milligrams per liter	TRPH	Total recoverable petroleum hydrocarbons
mg/m ³	Milligrams per cubic meter	UCL	Upper confidence level
MPE	Multi-phase extraction	USCS	Unified Soil Classification System
MRL	Method reporting limit	USGS	United States Geologic Survey
msl	Mean sea level	UST	Underground storage tank
MTBE	Methyl tertiary butyl ether	VCP	Voluntary Cleanup Program
MTCA	Model Toxics Control Act	VOC	Volatile organic compound
NAI	Natural attenuation indicators	VPC	Vapor-phase carbon
NAPL	Non-aqueous phase liquid		



- EXPLANATION**
- ◆ MW11C Groundwater monitoring well
 - ◆ MW8A/B/C Nested groundwater monitoring well
 - ◆ MW-6S Continental Heat Treating groundwater monitoring well
 - + FVP-20 Continental Heat Treating soil vapor sampling probes
 - ▲ B1/VEW Soil vapor extraction well
 - ◆ SVP7 Soil vapor sampling well
 - ◆ SVP14 Deep multi-depth soil vapor well
 - ◆ SVP13 Shallow multi-depth soil vapor well
 - PVP-1A Continental Heat Treating soil sample location
 - B23 Soil boring

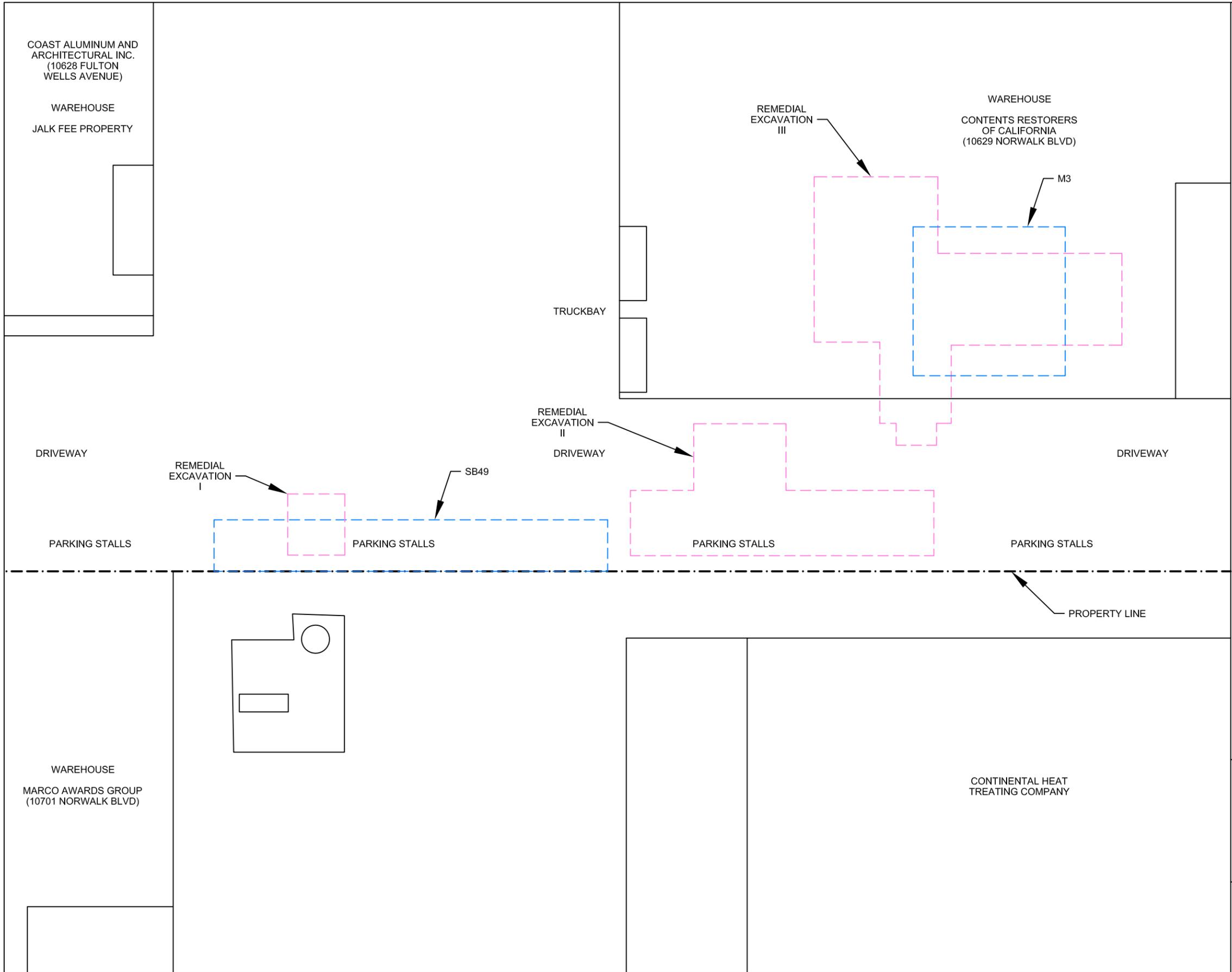


FN11550006

GENERALIZED SITE PLAN

FORMER EXXONMOBIL JALK FEE PROPERTY
10607 Norwalk Boulevard
Santa Fe Springs, California

	PROJECT NO.
	1155
	PLATE
	1
	DATE: 03/24/15



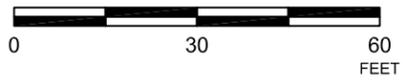
EXPLANATION

- - - - - Excavation area - 1998
- - - - - Excavation area - 2000



SOURCE:
 Modified from maps provided by
 Newfields Environmental & Engineering LLC
 TRC Alton Geoscience and
 GOOGLE EARTH PRO

APPROXIMATE SCALE



FN1155.SPCLTY05

EXCAVATION AREA LOCATION MAP

FORMER EXXONMOBIL JALK FEE PROPERTY
 10607 Norwalk Boulevard
 Santa Fe Springs, California



PROJECT NO.
1155

PLATE
2

DATE: 03/24/15

APPENDIX A

**JUNE 23, 2010 CRWQCB-LAR RESPONSE TO LETTER
DATED MAY 19, 2010**



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 23, 2010

Mr. James Stull
Continental Heat Treating
10643 Norwalk Boulevard
Santa Fe Springs, CA 90670

RESPONSE TO LETTER DATED MAY 19, 2010 FROM MR. MICHAEL FRANCIS OF DEMETRIOU, DEL GUERCIO, SPRINGER & FRANCIS, LLP – CONTINENTAL HEAT TREATING (CHT), 10643 SOUTH NORWALK BOULEVARD, SANTA FE SPRINGS (SCP NO. 1057, SITE ID NO. 204GW00)

Dear Mr. Stull:

Los Angeles Regional Water Quality Control Board (Regional Board) staff received a letter from your attorney, Mr. Michael Francis of Demetriou, Del Guercio, Springer & Francis, LLP, dated May 19, 2010, providing comments to the Regional Board following the issuance of the California Water Code (CWC) section 13267 Order dated May 5, 2010 (Order). The Order requires preparation and submittal of technical report(s) for the lateral and vertical delineation of impacted soil, soil-gas, and groundwater on and offsite (if necessary), including the installation of three on-site groundwater monitoring wells in accordance with a work plan dated March 2, 2002, and subsequently approved in a letter from Regional Board staff dated April 16, 2002.

Mr. Francis indicates that the Regional Board “cites to and relies upon numerous erroneous allegations” in the Order. Regional Board staff relies upon documentation and data provided by consultants representing individual sites. Our decisions and actions are based upon the assumption that the information provided to us is accurate and representative of conditions at a site. Below are some of the comments provided by Mr. Francis (italicized) followed by Regional Board staff responses:

- *... your May 5, 2010 letter states that there was a pipe trench from the degreaser to the north end of the building and continuing westward along the property line. This was a utility trench and it did not convey or contain perchloroethylene (“PCE”).*

Several of the alleged errors pertain to a report by McLaren-Hart (McLaren Report) dated September 23, 1993, as referenced in the letter by Mr. Francis. The McLaren Report indicates that a pipe trench was shown going from the degreaser to the north end of the building, just west of the electrical panel. This conduit, regardless of its intended use, may have created a preferential pathway for tetrachloroethene (PCE) migration.

- *Second, the RWQCB mis-stated the February 15, 1993 purported hazardous materials registration forms. Such forms did not report an average PCE use of 125 gallons per day and a maximum daily use of 250 gallons per day. Instead, such forms reported an average PCE storage of 125 gallons per day and a maximum daily storage of 250 gallons.*

The McLaren Report indicated an average use of 125 gallons per day and a maximum daily use of 250 gallons per day. However, the term "use" may have been used in the McLaren Report to address quantities of PCE stored in the degreaser.

- *Furthermore, you state that CHT annually generated 1.5 tons of waste PCE. Please note that 1.5 tons of PCE is equivalent to approximately 225 gallons of PCE. This annual volume of PCE translates to an average daily PCE use of approximately one half gallon.*

The numbers provided by Mr. Francis translate to an average daily PCE *waste* of one half gallon, which does not represent how much PCE was used for daily operations in the degreaser tank. According to the McLaren Report, the PCE degreaser capacity was 500 gallons. It is reasonable to assume that this tank was filled to appropriate levels to accommodate daily operations at CHT.

- *Third, you indicate there was a degreaser formerly located in the northeast portion of the on-site building. CHT requests the RWQCB provide CHT with the documentation of such purported degreaser location.*

The McLaren Report indicates that an inspection report dated April 5, 1982 (included in the Industrial Waste Permit file with the Los Angeles County Sanitation District), noted that a degreaser was present in the northeast portion of the building.

- *With respect to the degreaser you described as being "in-ground," that unit was in fact a free standing degreaser that was installed in a reinforced concrete vault.*

According to the report by Trilogy Regulatory Services dated December 21, 2004, "The degreaser was an in-ground metal-walled tank set within a concrete vault."

- *Fourth, you state that certain site assessment data associated with the Property indicate certain impacts to the Property's soil matrix, soil gas and groundwater. However, as explained further below, the adjacent Jalk Fee property was/is heavily contaminated.*

Primary sources of PCE contamination (degreaser, storage area, etc.) have been identified at CHT. Impact to the subsurface has been detected in soil gas samples at multiple locations throughout CHT, and in the area of the former degreaser from the ground surface to groundwater (approximately 60 to 70 feet below ground surface [bgs]) in both soil gas and soil matrix samples. To date, the extent of subsurface PCE contamination has not been defined or remediated adequately.

The adjacent Jalk Fee property was used for oil production operations and no primary source(s) of PCE contamination have been identified. However, PCE contaminated soil was encountered at Jalk Fee's southern property boundary, adjacent to CHT. During their site redevelopment activities in approximately 2000, the majority of PCE impacted soil to a depth of approximately 15 feet bgs was removed from the Jalk Fee property.

- *In addition, the Omega Chemical Site's 4.5 mile PCE plume passes beneath the Property. Thus, those known upgradient contamination sources may have caused, in whole or part, the observed soil matrix, soil gas and groundwater impacts to the Property. Contrary to your assertions, the soil gas PCE concentrations observed beneath the Property at the capillary fringe suggest such*

levels are the result of the Omega PCE plume and/or the Jalk Fee property soil and groundwater contamination.

The historic soil matrix and soil gas data shows high levels of PCE and trichloroethene (TCE) contamination from the surface to groundwater at CHT. The highest soil matrix PCE and TCE concentrations were detected at 0.5 feet bgs at 7,514 and 4,759 micrograms per kilogram ($\mu\text{g}/\text{kg}$), respectively, adjacent to the former degreaser. Releases at CHT have impacted the subsurface, including, soil matrix, soil gas, and groundwater, and have contributed to the regional Omega groundwater plume. CHT has been identified as a responsible party in the US Environmental Protection Agency's Omega Chemical groundwater plume investigation and cleanup.

- *Fifth, the CHT soil vapor extraction ("SVE") system operations were terminated because the Jalk Fee property's petroleum hydrocarbon contamination migrated on to the Property and interfered with the SVE's operations. Such Jalk Fee property petroleum hydrocarbon caused the CHT SVE system to be shut down.*

Total petroleum hydrocarbons (TPH) contamination seen in soil gas probes at CHT from approximately 5 feet bgs to the groundwater interface indicate a potential source of TPH contamination at CHT. Additional subsurface investigation(s) at CHT will help determine the impact of TPH contamination associated with historic operations at CHT.

- *Finally, there is no data that confirms an allegation that the CHT property is a source of groundwater contamination.*

Due to the elevated concentrations of chlorinated volatile organic compounds (VOCs) and TPH contamination detected in soil gas and soil matrix samples in the area of the former degreaser from near ground surface through the entire soil column to approximately 60 feet bgs (capillary fringe), groundwater has been impacted from releases at CHT. However, no groundwater wells have been installed at CHT to determine how extensive this impact may be.

- *CHT requests the RWQCB provide CHT with a copy of the McLaren Report. ...CHT requests the RWQCB provide CHT with a copy of the recent RWQCB groundwater monitoring directive that was issued in connection with the Jalk Fee property and provide CHT with a copy of the Jalk Fee workplan for such ordered groundwater monitoring.*

In accordance with the Freedom of Information Act (FOIA), you may request a file review of the CHT and Jalk Fee case files. A copy machine is available for your use with a charge of \$0.15 per page. Please send a file review request for each case via fax to (213) 576-6713 or via email to Laura Gallardo at lgallardo@waterboards.ca.gov. Please include the site name, address, Site Cleanup Program number (SCP No. 1057 [CHT], SCP No. 0203 [Jalk Fee]), and your contact information. A representative from the Regional Board will contact you to confirm the appointment. In addition, most recently submitted reports/documents and Regional Board correspondence have been uploaded to GeoTracker. You may search, review, and download the case information from the GeoTracker database at the following address: <http://geotracker.waterboards.ca.gov/>.

- *...CHT will delay the implementation of the RWQCB approved groundwater monitoring workplan until: (1) such work can be coordinated with the RWQCB directed Jalk Fee property*

groundwater monitoring; and (2) the RWQCB directed soil and soil gas delineation work, on the Property, is complete.

Accordingly, the September 15, 2010 due date for the submittal of a groundwater well installation and sampling report will not be met.

At this time, the work required at the Jalk Fee site is irrelevant to the requirements issued in the Order. To date, no groundwater wells have been installed at CHT despite a work plan being submitted in March 2002 and the issuance of a work plan approval letter by the Regional Board dated April 16, 2002. The installation of the approved groundwater monitoring wells will be an initial step in evaluating impact to groundwater from releases at CHT. These wells will provide basic hydrologic information needed to understand subsurface conditions at CHT, which will be used for the installation of additional on and offsite groundwater wells, as needed, to delineate the lateral and vertical extent of releases at CHT. Therefore, in accordance with the Order, you are required to complete the installation of the groundwater monitoring wells as proposed in the work plan dated March 2, 2002 and as approved in the Regional Board's work plan approval letter dated April 16, 2002. As directed in the Order, a groundwater well installation and sampling report is due to the Regional Board by **September 15, 2010**. Failure to comply with the requirements of the Order will result in additional enforcement action(s) being taken by the Regional Board.

- *Finally, with respect to the RWQCB's "Chemical Storage and Use Questionnaire," CHT respectfully requests the RWQCB advise CHT of the RWQCB's statutory authority to request this information.*

Please refer to California Code of Regulations (CCR), Title 23, section 2907, which is a summary of the regulatory provisions contained in State Water Resources Control Board Resolution No. 92-49. Resolution No. 92-49 is available online at the following address:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1992/rs1992_0049.shtml.

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

Sincerely,



Samuel Unger, PE
Interim Executive Officer

cc: Mr. Michael A. Francis, Demetriou, Del Guercio, Springer & Francis, LLP

APPENDIX B

1956-2005 AERIAL PHOTOS



INQUIRY #: 2807888.5

YEAR: 1956

| = 400'





INQUIRY #: 2807888.5

YEAR: 1968

 = 480'





INQUIRY #: 2807888.5

YEAR: 1976

 = 666'





INQUIRY #: 2807888.5

YEAR: 1989

 = 666'





INQUIRY #: 2807888.5

YEAR: 1994

 = 666'





INQUIRY #: 2807888.5

YEAR: 2002

| = 666'



EDR Environmental Data Resources Inc.



INQUIRY #: 2807888.5

YEAR: 2005

 = 604'



APPENDIX C

PUBLIC AGENCY RECORDS REQUESTS AND RESPONSE FOR JALK FEE PROPERTY



CYNTHIA A. HARDING, M.P.H.
Interim Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.
Interim Health Officer

Public Health Investigation Administration
LEOLA MERCADEL
Chief, Public Health Investigation

5555 Ferguson Drive, Suite 120-04
Commerce, California 90022
TEL (323) 890-7801 • FAX (323) 728-0217

www.publichealth.lacounty.gov

February 25, 2015

CARDNO
ROBERT SERRATO
4572 TELEGRAPH RD #916
VENTURA, CA 93003

SUBJECT: 10607 Norwalk Blvd. Santa Fe Springs, CA 90670

I, the undersigned, being the Custodian of Records, certify that a thorough search of our files, carried out under my direction and control, revealed no records as named in your request for records.

It is to be understood that this does not mean that records do not exist under another spelling, another name, or under another classification, but that with the information furnished our office, and to the best of our knowledge, no such records exist in our files.

Sincerely,

Christian Sten, Deputy Health Officer
Public Health Investigation

COR ID No. 151126

Request - NO Records
Revised 3/15/13



BOARD OF SUPERVISORS

Hilda Solis
First District

Mark Ridley-Thomas
Second District

Sheila Kuehl
Third District

Don Knabe
Fourth District

Michael D. Antonovich
Fifth District

**PUBLIC HEALTH INVESTIGATION
CUSTODIAN OF RECORDS
REQUEST FOR PUBLIC RECORDS**

TEL (323) 890-7806

FAX (323) 728-0217

Complete the Custodian of Records Request for Public Records Form in blue or black ink, or type.
If you have any questions about completing the form or requesting Hazardous Materials reports call (323) 890-7806.

Submit your request to Public Health Investigation, Custodian of Records Office to Fax Number (323) 728-0217, Email to phicor@ph.lacounty.gov, or mail to:

Public Health Investigation
5555 Ferguson Drive Suite 120-04
Commerce, CA 90022

***Required Information**

REQUESTOR INFORMATION	
Name *	
Address *	
City *	
State *	
Zip *	
Telephone No. *	
Fax No.	
Website/Email	

CONTACT PERSON INFORMATION (If different from Requestor)	
Name	
Telephone No.	

DELIVERY OF RECORDS (If different from Requestor)	
Address	
City	
Zip	

RECORD INFORMATION Type of Record * (Choose only one per request)			
ENVIRONMENTAL HEALTH DISTRICT SURVEILLANCE	ENVIRONMENTAL HEALTH PROTECTION	HEALTH HAZARDOUS MATERIALS	ALL OTHERS
Apartment, Condo, Home Inspections	Beaches	CalARP	Animal Bite Report
Apartment, Condo, Home and Institution Lead Inspections	Landfills	Emergency Response	Medical Marijuana ID
Food Borne Outbreak	Public Swimming Pools	Hazmat Site Inspections	
Food Poisoning	Recycled Water	Hazmat Site Mitigation	
Food Vehicles	Residential Pools		
Motels and Hotel Inspection	Septic Tanks		
Retail Food Inspection	Sewage		
Schools and Day Care Inspection	Water Wells		
Street Vendor			
Other Type of Record:			

REQUEST INFORMATION (Provide as much information possible)	
Incident Date/Time	
Incident/Food Borne Illness/Outbreak Summary No.	
Type of Disease	
Inspector Name (If known)	
Incident Location	
Owner Name	
Victim/Patient/Complainant Name	
Date of Birth	
Medical Record No.	
Location of Records	
Site/Street Address	
Site/City	
Site/Zip	

Office Use Only Appointment	
Date _____	
Time _____	

Date	# of pages
To	From
Co/Dept	Co.
Phone #	Phone #
Fax #	Fax #



Santa Fe Springs Fire-Rescue
 11300 Greenstone Ave • Santa Fe Springs CA 90670
 (562) 944-9713 • FAX (562) 941-1817 • fire@santafesprings.org

REQUEST FOR SITE INFORMATION

NOTE: To accommodate your request, please allow time for confidential information to be removed prior to viewing. If Fire staff performs work outside public viewing, the information will not be released until payment is received.

SEARCH REQUESTED BY

CARDNO
 COMPANY/ORGANIZATION

ROBERT.SERRATO@CARDNO.COM
 E-MAIL ADDRESS

ROBERT SERRATO
 PRINT NAME

[Signature]
 SIGNATURE

ASSISTANT PROJECT MANAGER
 TITLE

805-290-3275
 PHONE NUMBER

2/20/15
 DATE

REASON FOR THIS REQUEST REVIEW RECORDS FOR EVIDENCE OF PCE/SOLVENTS RELEASE

TYPE OF INFORMATION REQUESTED NOTICE OF VIOLATIONS, INSPECTION RECORDS, PERMITS, WASTE MANIFESTS, REPORTS, CORRESPONDENCE

Fees for service

- Public viewing of records is free of charge.
- \$5.00 per box will be assessed for retrieval of historical documents stored off-site. Per copy charge is .20.

File review hours

- 9:00 AM – 11:00 AM
- Please contact our office to reserve an appointment time. We can no longer accept walk-ins.

NAME OF COMPANY AT SITE

EXXONMOBIL

ADDRESS

10607 NORWALK BLVD, SANTA FE SPRINGS, CA

NOTE: Some information may be confidential and is not disclosable to the general public. Confidential information includes facility maps, contacts, trade secrets, etc. To see such information, a release from the business owner must be attached to this form.

OFFICE USE ONLY

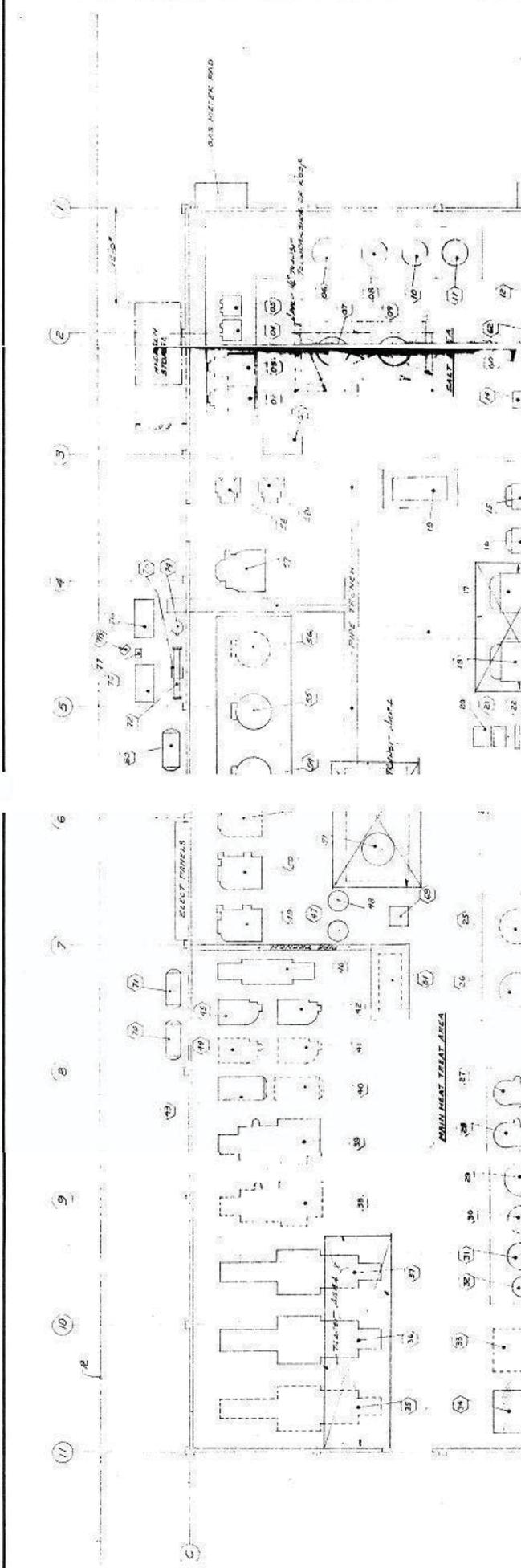
CHARGE FOR ARCHIVED FILES \$ _____
 CHARGE FOR COPIES \$ _____
 CHARGE FOR MAILING \$ _____
 TOTAL AMOUNT DUE \$ _____

REQUEST PROCESSED BY _____
 DATE RECEIVED _____
 DATE COMPLETED _____

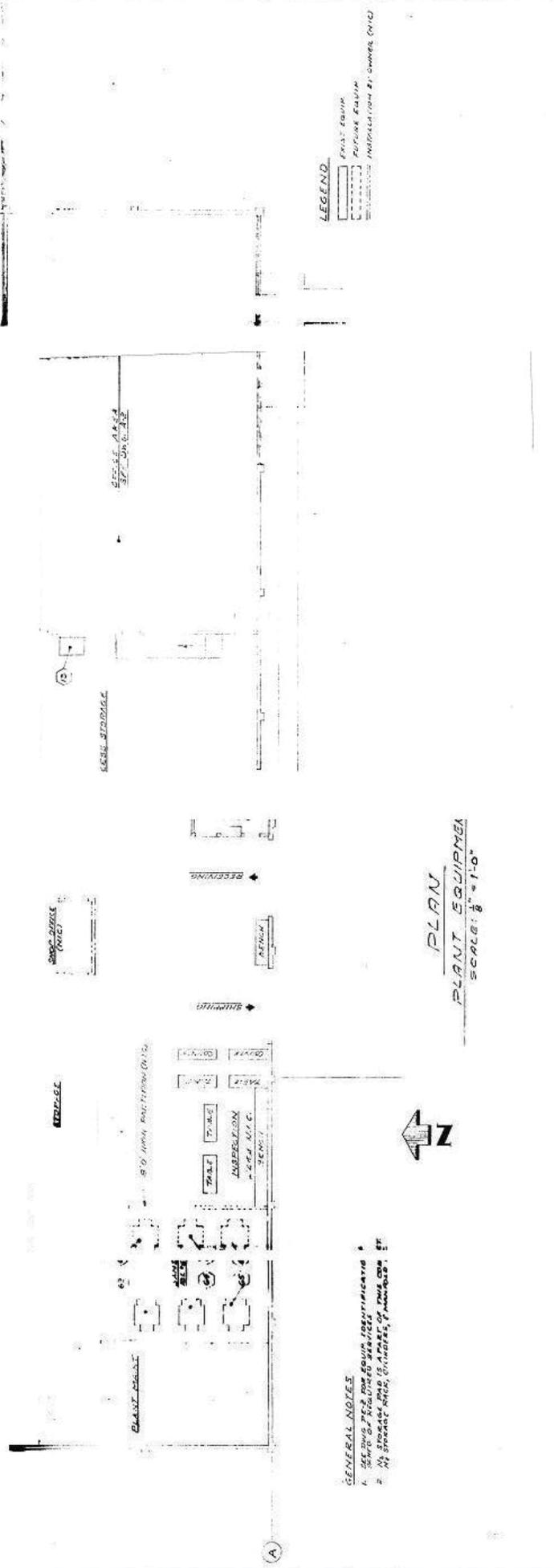
APPENDIX D

AUGUST 20, 1968 CHT BLUEPRINTS

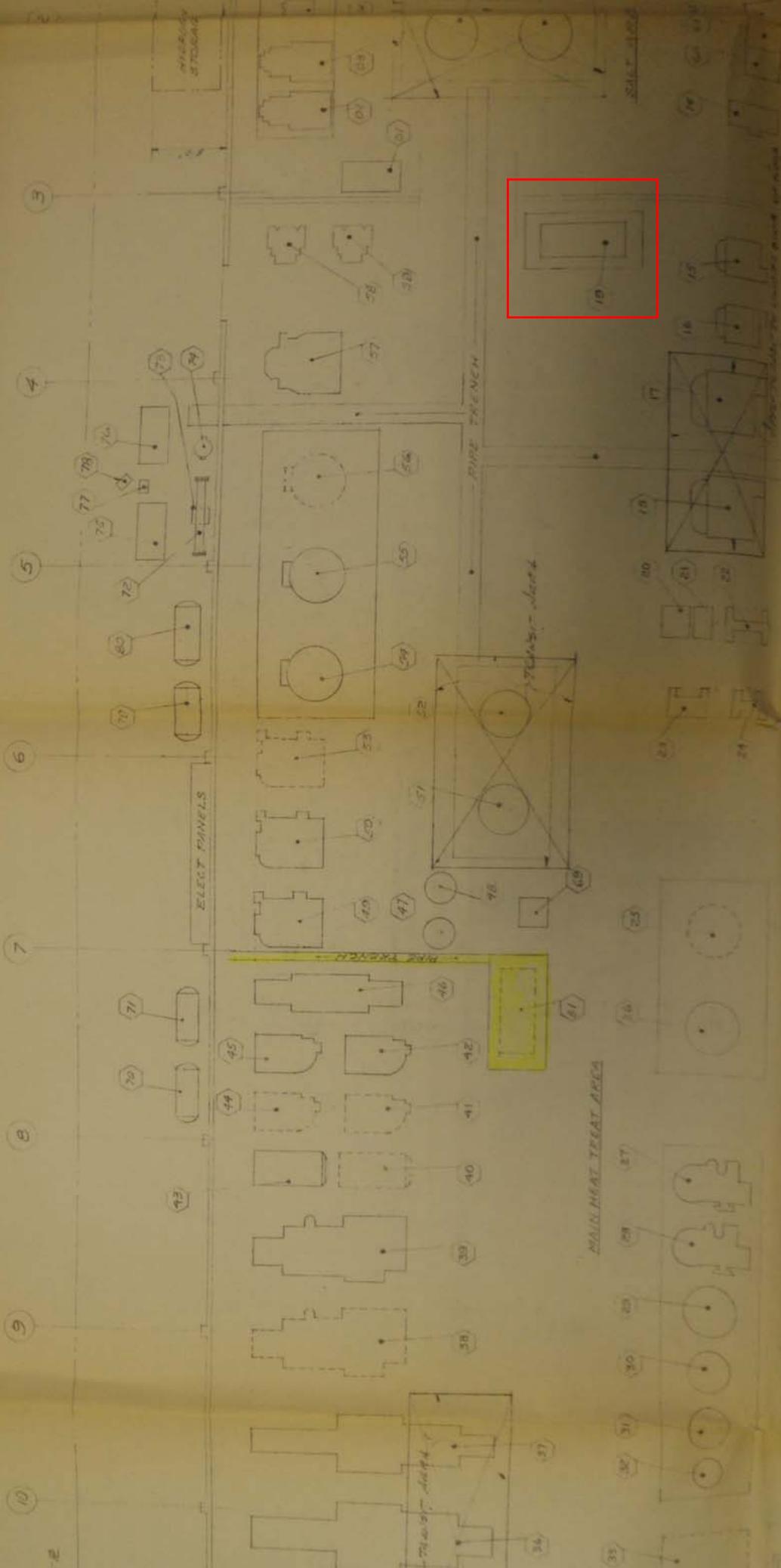
NO. 802	PROJECT	PLANT EQUIPMENT
DATE	DESIGNED BY	SCALE
APPROVED BY	DATE	NO. 802
REVISIONS	BY	DATE
	MS	1-1-67
	MS	1-1-67
	MS	1-1-67



NO. 802	PROJECT	PLANT EQUIPMENT
DATE	DESIGNED BY	SCALE
APPROVED BY	DATE	NO. 802
REVISIONS	BY	DATE
	MS	1-1-67
	MS	1-1-67
	MS	1-1-67



PLAN
PLANT EQUIPMENT
SCALE: 3/8" = 1'-0"



APPENDIX E

**DECEMBER 12, 1969 CITY OF SANTA FE SPRINGS
INDUSTRIAL WASTE SURVEY**

INDUSTRIAL WASTE SURVEY

City SANTA FE SPRINGS

I. File No. REQUESTED I-6585-14

S.M.D. No. 0515-75

Permit No. REQUESTED 4365

Firm Name: CONTINENTAL HEAT TREATING

Address: 10643 NORWALK BLVD Tel. No. 944-8808

between FLORENCE AVE and CLARK AVE

Contact Name JETT WEGANS Title: MAINTENANCE SUPV.

Business and Processes: HEAT TREATING, DEGREASING, AND RINING.

TYPE AND QUANTITY I.W.: OIL, SALT AND CYANIDE, 110 GALLONS A DAY

WASTE DISPOSAL:

Sewer: S.M.D. 0515-75 San Dist. 18 Volume 110 GALS. A DAY

Surface Drainage TO STREET Cooling Water RECIRCULATED Uncontaminated NONE

Ground NONE

Other NONE

PRETREATMENT FACILITIES:

Location ENTRANCE OF BLDG. OUTSIDE

Trap: Standard NOT (1000) Non Standard NONE

Other: NONE

REQUIREMENTS AND DATA:

Inspection YES Frequency MONTHLY Permit REQUESTED

New Industry YES Resurvey NO T.C. Requested YES

Classification 201 Method of Disposal 1

REMARKS AND RECOMMENDATIONS:

COILING TOWER HAS A SMALL AMOUNT OF BLEEDOFF. FLOOR DRAINS WERE NOT INSTALLED AS DRAINAGE FROM RINSE TANKS ARE CONNECTED DIRECTLY TO INTERCEPTOR. PERMIT APPLICATION LEFT AT SITE.

Survey by: Robert B. W. Hartley Date: 12-12-69

APPENDIX F

**JANUARY 20, 1970 CITY OF SANTA FE SPRINGS
INDUSTRIAL WASTE DISPOSAL PERMIT**

Region 10
v

CITY OF SANTA FE SPRINGS

January 27, 1970

Mr. Robert L. Williams
City Manager
Santa Fe Springs, California

Dear Mr. Williams:

CONTINENTAL HEAT TREATING CORPORATION
10643 SOUTH NORWALK BOULEVARD
FILE NO. I-6585-1H

We are transmitting Industrial Waste Disposal Permit No. 4365 to your office for processing and delivery to the permittee. This permit has been prepared in accordance with the ordinance requirements of the City of Santa Fe Springs. The permit regulates the disposal of industrial wastes produced on this location.

Please advise this office when this permit has been delivered.

Yours very truly,

John A. Lambie
CITY ENGINEER

Original Signed

C. G. Brisley, Jr.
Deputy

CGB:NB-vs 8

Enclosures

dc: I-6585-1H, Per. Issd., Region 10, GM, NB, Extra

CITY OF SANTA FE SPRINGS
INDUSTRIAL WASTE DISPOSAL PERMIT

No. 4365

File: I-6585-1H

Date: 1/20/70

Permission is hereby given under Chapter 18 of the City Code

(As amended) to Continental Heat Treating Corporation

10643 South Norwalk Boulevard

(Mailing Address)

to discharge waste material from or upon the premises located at

10643 South Norwalk Boulevard

Wastes covered by this permit shall consist of:

washdown and wastes from heat treating, quenching, and degreasing
metals.

and shall comply with all provisions of applicable ordinances of the City of Santa Fe Springs including the special conditions and limitations marked (x) on the second page of this permit.

In accordance with Section No. 18-114 of the City Code of the City of Santa Fe Springs, this permit is not transferable from one location to another and it may be revoked if used contrary to the provisions of the Ordinance.

This permit is automatically suspended without notice if the Industrial Waste Permit Fee or Annual Renewal is not paid within 60 days from the day on which said fee is due.

John A. Lambie
CITY ENGINEER

SPECIAL CONDITIONS AND LIMITATIONS

INDUSTRIAL WASTE DISPOSAL PERMIT NO. 4365.

JAN 20 1970

All wastes shall be disposed of in accordance with the conditions marked below:

- (X) A standard pretreatment facility designated by the City Engineer as sand & grease interceptor Standard No. ____.
1,000 gallon capacity
- () A grease interceptor of a type approved by the City Engineer with a flow capacity _____ gallons per minute and grease retention capacity of _____ pounds.
- () A garbage grinder approved by the City Engineer and equipped a valve operating to automatically shut off the water supply when the grinder is not in use.
- () Special facilities constructed in accordance with plans approved by the City Engineer, which plans are hereby made a part of this permit.
- () Special Facilities:
- (X) Further special conditions and limitations as listed below.

The Sanitary Sewer and Industrial Waste Chapters of the City Code contain certain restrictions on the use of sanitary sewers and other methods of the disposal of industrial wastes. A copy of this ordinance may be obtained by applying to the City Hall, 11710 Telegraph Road, Santa Fe Springs, California 90670.

In general, the intent of the ordinance is to prevent the discharge, deposit, or disposal of all wastes including any material which may cause pollution of underground or surface waters in, upon, or affecting the incorporated territory of the City of Santa Fe Springs, and to provide protection to the public sewers, industrial connection sewers, and treatment plants. Storm water or uncontaminated cooling water cannot be discharged to the sewer. All required pretreatment facilities must be regularly cleaned and otherwise maintained in good operating condition.

Compliance with the special conditions listed in this permit in no way relieves the permittee from the obligation of meeting requirements of the Sanitary Sewer Ordinance or liability for payment of costs of cleaning or repairing sewers occasioned by the violation of such ordinances.

If further information is desired, please contact the Project Planning and Pollution Control Division of the Department of County Engineer at 629-4747, extension 81385.

1. The concentration of cyanide in any waste (including HCN and CN^-) shall not exceed 10 ppm.
2. All effluent discharged to the sanitary sewer shall be treated, when necessary, to maintain a pH between 6.0 and 9.0.

APPENDIX G

**SEPTEMBER 23, 1993 MCLAREN HART PCE AND HEAVY
METALS IN SOIL AT THE JALK LEASE LETTER**



September 23, 1993

Mr. T. M. Walker, P.E.
Environmental Engineer
Mobil Exploration and Producing U.S. Inc.
10735 South Shoemaker Avenue
Santa Fe Springs, CA 90670

PERCHLORETHYLENE (PCE) AND HEAVY METALS IN SOIL AT THE JALK LEASE

Dear Mr. Walker,

McLaren/Hart has completed our review of the site characterization report prepared by Levine/Fricke ("Draft Subsurface Soil Investigation, Jalk Fee Property, 10607 Norwalk Boulevard, Santa Fe Springs, California"). The report included data showing that the soil contains crude oil, which would be expected in an active oil field. The report also documented that the soil contains lead, which presumably leached from metal pipes in an area known as the "boneyard", and perchloroethylene (PCE), which we believe is a result of operations at the neighboring facility.

This letter briefly explains the significance of the findings which were presented in the Levine and Fricke report and makes recommendations on how Mobil should proceed.

HEAVY METALS

Total lead, mercury, and zinc were detected in the boneyard in the southwest corner of the property at maximum concentrations of 1,750, 34.1, and 10,000 milligrams per kilogram (mg/kg), respectively. These concentrations exceed the Total Threshold Limit Concentration (TTLC) of 1,000, 20, and 5,000 mg/kg. Soluble lead and zinc were also detected at maximum concentrations of 151 and 474 milligrams per liter (mg/l). These concentrations exceed the Soluble Threshold Limit Concentration (STLC) of 5 and 250, respectively. Samples exceeding the TTLC and STLC were found at both the three foot and the eight foot depths. No samples were collected below eight feet.

Although the lead samples were collected from random sample locations, it appears that the lead is confined to the northeast corner of the boneyard, representing approximately one third of the

STAFF/TERRELL/135.LTD

16755 Von Karman Avenue, Irvine, CA 92714 (714) 756-2667 FAX (714) 756-8460

REC'D PAGE

total surface area of the boneyard, approximately 6,100 square feet. Excavation of this area to a depth of eight feet would result in approximately 1,800 cubic yards of soil.

Since the data show that metal concentrations were increasing between 3 and 8 feet, it is reasonable to assume that the soil below 8 feet may contain metals exceeding the cleanup criteria. We recommend additional sampling below eight feet prior to excavation to define the vertical extent of heavy metals.

PERCHLOROETHYLENE (PCE)

Perchloroethylene and related compounds [trichloroethylene (TCE) and 1,2-dichloroethylene (DCE)] were detected in the soil at the Jalk Fee. These chlorinated compounds are used in such industries as dry cleaning, electronics, aerospace, and metal treating, but are not used in oil production. The maximum concentration of PCE in soil at the Jalk Fee is 2,500,000 parts per billion (ppb). The following sections describe the possible source of PCE at this location.

Santa Fe Springs Fire Department Record Review

In an attempt to identify possible sources of the PCE at the Jalk lease, McLaren/Hart reviewed the files at the Environmental Compliance Section of the City of Santa Fe Springs Fire Department. A written request to review the file on Continental Heat Treating was submitted by FAX on Tuesday, May 11, 1993 and the file was reviewed on Wednesday, May 12th. The following is a summary of the information in the file relevant to the PCE on the Jalk lease.

Use of PCE at Continental Heat Treating

The Continental Heat Treating facility was designed in 1968 and began operation in 1969. The facility drawings (Job # 6802, PE-1) dated August 20, 1968 showed a degreaser located approximately 120 feet west of the northeast corner of the building and 30 feet south of the northern wall of the building. A pipe trench was shown going from the degreaser to the north end of the building, just west of the electrical panel. The PCE on the Jalk lease was found in the area beginning exactly where the pipe trench left the building and continuing west to the northwest corner of the building. (See Figure 1)

In a letter to the City of Santa Fe Springs dated March 30, 1987, Continental Heat Treating reported that PCE was "used for cleaning of parts prior to heat treating." The hazardous material registration forms (February 15, 1993) reported an average PCE use of 125 gallons per day and a maximum daily use of 250 gallons per day. The Business Plan described a 500 gallon above ground PCE tank, although the location of this tank could not be determined from the information in the file.

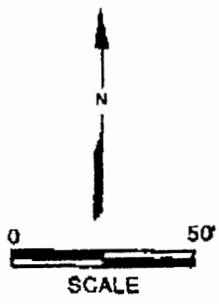
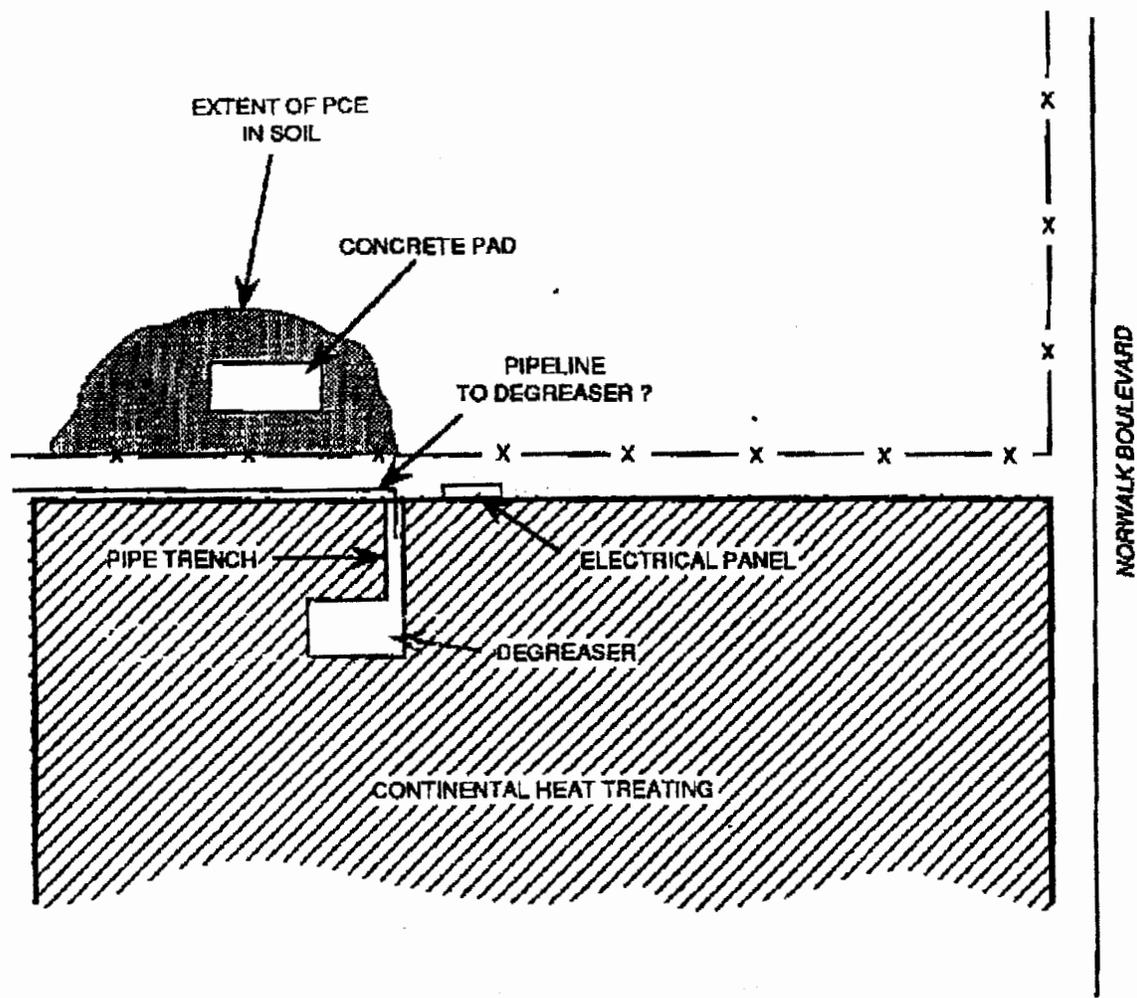


FIGURE 1
DISTRIBUTION OF
PERCHLOROETHYLENE (PCE) ON
JALK LEASE NEAR CONTINENTAL
HEAT TREATING DEGREASER

DESIGNED BY SD	DATE 5-20-93	KIMMEL PART ENVIRONMENTAL LABORATORY CORPORATION
ORDERED BY DXD	DATE	
APPROVED BY [Signature]	DATE 5-20-93	DRAWING NO. S9305114

Mr. T.M. Walker
September 22, 1993
Page 4

Documented Annual PCE Waste Generation

The hazardous materials registration forms (February 15, 1993) reported that 1.5 tons of PCE are generated each year at the facility. In the March 30, 1987 letter to the City of Santa Fe Springs, Continental Heat Treating reported that the PCE was stored in a tank provided by Acto Kleen Corporation and was disposed by Acto Kleen for recycling.

Hazardous Waste Code Violations

Continental Heat Treating has operated under an Industrial Waste Permit from the Los Angeles County Sanitation District and predecessor agencies since the 1970's. Permit # 4365 was issued on January 27, 1970 and Permit #4827 was issued on November 18, 1976. These permits did not include limits or sampling requirements for PCE.

Various inspections, violations, and complaints over the years were included in the file. These included:

- ▶ A Notice was issued on July 11, 1978 from the LA County Engineer ordering Continental Heat Treating to "clean the interceptor by July 18, 1978" and "maintain the interceptor in good operating condition at all times."
- ▶ An inspection report of April 5, 1982 noted under "Special Hazards and Conditions" that a degreaser was present in the northeast portion of the building.
- ▶ A complaint to the Fire Department was recorded on October 5, 1987 that blue-green water was being discharged to the street. This was attributed to the recent earthquake (October 4, 1987) which had broken several pieces of equipment at the site and that "a discharge similar to that of December 8, 1986 was occurring."
- ▶ A Notice of Violation (NOV) was issued on February 23, 1988 for discharging cooling tower blow down water to the street.
- ▶ The Santa Fe Springs Fire Department cited Continental Heat Treating on June 14, 1988 for failure to disclose certain materials on the 1987 plot plan.

Possible Explanations

Illegal and accidental discharges of chlorinated solvents to soil are typically not reported and are not discovered until a site characterization is performed. The data from the Levine/Fricke report

STAFF/TERRILLB135.L7B



showing PCE in the soil, the use of large quantities of PCE on the adjoining site, the location of the PCE in soil relative to the degreaser and pipe trench on the Continental facility, and the complete absence of any use of chlorinated solvents of any kind by Mobil E & P, very strongly points to Continental Heat Treating as the source of the PCE on the Jalk Fee.

The following possible explanations are based on the information we were able to find and on past experience with similar situations. We cannot say which of these explanations is most likely or whether there is another possible explanation for the observed PCE.

Intentional or Unintentional Discharge. One possible explanation is that PCE from the degreaser or from the above ground storage tank was discharged to the ground by an employee or contractor working on site. This could have resulted from any number of activities such as overflow, spillage, a broken pipe, or an intentional discharge of waste PCE.

Fires. Three degreaser fires were reported in the Continental Heat Treating file at the Santa Fe Springs Fire Department:

- ▶ Degreaser Tank Fire (Code 6205) 87/10/02;
- ▶ Fire in Degreaser (Code 6225) 88/04/09;
- ▶ Fire in Degreaser (Code 6229) 88/08/01.

Earthquake. The file made reference to two earthquakes (December 8, 1986 and October 4, 1987) that resulted in broken equipment and discharge of chemicals. Although these references were made to the cooling tower blowdown water, it is also possible that the piping between the degreaser and the PCE storage tank were among the "several pieces of equipment" that were damaged at the same time.

I would be happy to discuss this matter with you at any time. Please call me at (714) 752-3211 if you have any questions or requests for additional information.

Sincerely,



Dennis Dineen
Managing Principal Geoscientist
Assistant Regional Manager, Irvine

STAFFTERRELLB\135.LTB



APPENDIX H

**MARCH 16, 1984 COUNTY OF LOS ANGELES SURVEY
REPORT**

CITY AND STATE: Tower Industries Inc

10643 S. NORWALK BL. - S.F.S 90670

OWNER: Ray Berry - Pres

PERSON INTERVIEWED & TITLE: Dennis Hugel - Production Mgr

PHONE NO: 685-6920
EMERGENCY NO:
NO. EMPLOYED: 42

L.A. CO. PERM: 153090-101

INDUSTRIAL WASTE NO:
EPA NO: CAD053858296

SAFETY SHOWER: No
EATING AREA: Yes
TOILET & WASHING FACILITIES ADEQUATE: Yes
PERSONEL PROTECTIVE DEVICES ADEQUATE: Yes
PLANT SANITATION ADEQUATE: Yes

TYPE OF FACILITY & DESCRIPTION OF OPERATION: Heat Treating of Steel (including Stainless)

PROCESS	MATERIAL	CONTROL	I.I.I. HAZARD	TYPE	VOL./LBS.	HAZARDOUS WASTE STORAGE METHOD	DISPOSAL METHOD	MANIFEST
Heat treatment including annealing & hardening Oil + water of benching Parts cleaning (1) degreasing Degreaser - Perchloroethylene (2) H-H trichlorethane (3) abrasive blasting using glass (silica) beads (4) acetone Describe the process anneal - heat in oven - slow cool core hardening - what types	Steel			Oil	110 gal	Dump	Removed by Hauler - Lakewood	Yes
	Zincrich oil	type of oil?			no		Oil Service to BKK	
	Perchloroethylene			H-H T.C.E	4 gal	Drum	Manifest req.	
	H-H Trichlorethane			Acetone	no		Permitted by Supplier	
	acetone	how used not described in waste? etc		Perchloroethylene	150 gal	- Drum	ACTO Klean 7869 Paramount Dr PICO Rivera	
		how disposed?	Trash	Cyanide Waste	24 gal	Drum in Bermed area	Removed to BKK by Nash Salvage 46211 Placer Dr - Whittier	

NUMBER OF UNDERGROUND STORAGE TANKS: 1 gasoline + 6000 gal
VOLUME & TYPE OF WASTE IN UNDERGROUND TANK:
PRIVATE DISPOSAL SYSTEMS ON PREMISES: YES NO

ACCESS TO STORM DRAIN INLET ON PREMISES: YES NO
CHLORINATED HYDROCARBON USED: YES NO
SEWER CONNECTION ON PREMISES: YES NO

REMARKS: AQMD permits in force (gasoline tanks, abrasive blasting)

VIOLATIONS: oil on small area - NOV to be sent

RECORD TO: ACTION: SURVEY CONDUCTED BY: H. H. H. 3/16/84

APPENDIX I

MAY 19, 1989 COUNTY OF LOS ANGELES SURVEY REPORT

SIC.		COMPANY NAME		STREET		CITY & ZIP		DISTRICT	
		Continental Heat Treating		10643 Norwalk Bl		SFS 90670		SE	
OWNER		PERSON INTERVIEWED & TITLE		PHONE NO. (213) 944-8808		EMERGENCY NO.		NO. EMPLOYEES	
Stall, James, - owner		Bestian, Mike, G.M.						48	
L.A. CO. PHL NO.		INDUSTRIAL WASTE NO.		EPA NO.		SAFETY SHOWER			
153090-101				CAD05358295		EATING AREA <u>ck</u>			
TYPE OF FACILITY & DESCRIPTION OF OPERATION/PRODUCTS:						TOILET & WASHING FACILITIES ADEQUATE <u>ck</u>			
Metal Heat Treating						PLANT SANITATION ADEQUATE <u>ck</u>			

PROCESS	MATERIAL	TYPE	VOL/LBS	HAZARDOUS WASTE			I.H. HAZARD
				STORAGE METHOD	DISPOSAL METHOD	MANIFEST CONTROL	
① degreasing	PERC	2,200 gal Waste PERC	2,200 gal year	55 gal steel	Acto-Kleen (Pico Rivera)	400 gal (10 drum) 3/1/89 87746425	AAP Disposal 87746425 completed 1/89
② quenching	Mineral oil	min oil w/ter mix		clarifier pumped. once per quarter yr	Disposal Control Service	877464705 84497012 11-29-88 1200 gal.	Down (removed) Rev down. 89586534 7/25/89
③ Floor sweeping & spills	Dry absorbant		11 regular		Disposal Control Service	13 drum 12-5-88 87595747	Casualty Resource right.
④ Retort & Tempering	H ₂		approx 2500 gal	used in process	to atmosphere as reacted & unreacted gas		
⑤ Vacuum Furnace cooling & backfill	N ₂		approx 5000 gal 2 tanks / mo				

NUMBER OF UNDERGROUND STORAGE TANKS:	ACCESS TO STORM INLET ON PREMISES: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
VOLUME & TYPE OF WASTE IN UNDERGROUND TANK(S):	CHLORINATED HYDROCARBON USED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
PRIVATE DISPOSAL SYSTEMS ON PREMISES: YES <input type="checkbox"/> NO <input type="checkbox"/>	SEWER CONNECTION ON PREMISES: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

REMARKS: Hauls approx 1/quarter all wastes
 apparent motor oil discharges with one auto-typoid filter on ground SW corner

VIOLATIONS:

REFERRAL TO:	ACTION:	SURVEY CONDUCTED BY: James Odling / G Brughan
--------------	---------	---

SIC. _____
 COMPANY NAME _____ STREET _____ CITY & ZIP _____ DISTRICT _____
 OWNER _____ PERSON INTERVIEWED & TITLE _____ PHONE NO. _____ NO. EMPLOYEES _____
 EMERGENCY NO. _____
 L.A. CO. PHL NO. _____ INDUSTRIAL WASTE NO. _____ EPA NO. _____
 SAFETY SHOWER _____
 EATING AREA _____
 TOILET & WASHING FACILITIES ADEQUATE _____
 PLANT SANITATION ADEQUATE _____

TYPE OF FACILITY & DESCRIPTION OF OPERATION/PRODUCTS:

HAZARDOUS WASTE

PROCESS	MATERIAL	TYPE	VOL/LBS	STORAGE METHOD	DISPOSAL METHOD	MANIFEST CONTROL	I.H. HAZARD
T. Job Service	oils grease }	waste oil			Service Company → onto ground asphalt top at rear yard.		
Vacuum pumps	oil						
Hydraulic pump							
Parts cleaning by blasting (of tool steel)	Steel shot glass beads }	dust		swept to	domestic trash		

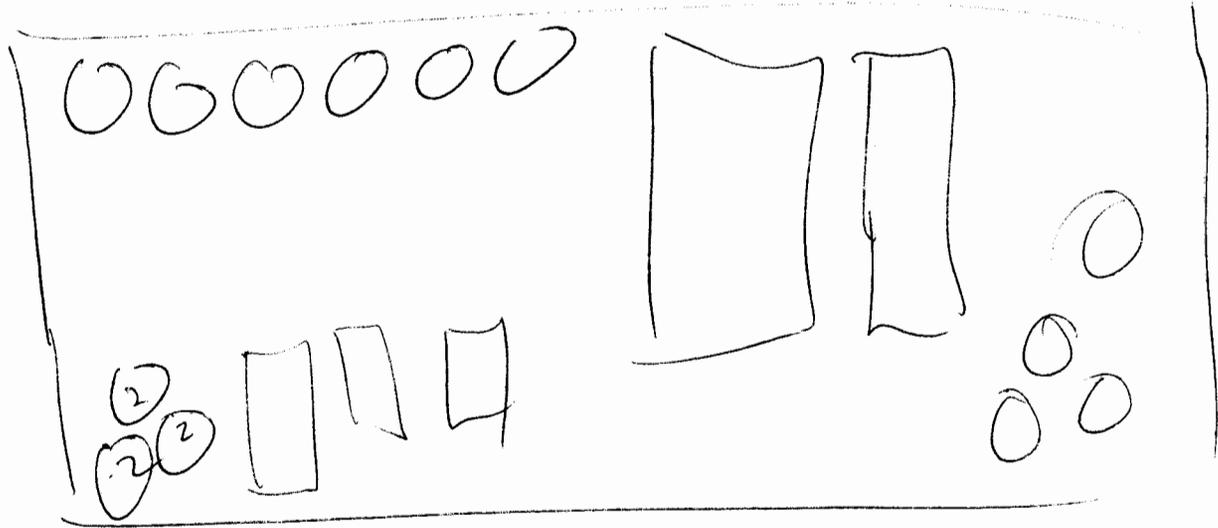
NUMBER OF UNDERGROUND STORAGE TANKS: _____
 VOLUME & TYPE OF WASTE IN UNDERGROUND TANK(S): _____
 PRIVATE DISPOSAL SYSTEMS ON PREMISES: YES _____ NO _____

ACCESS TO STORM INLET ON PREMISES: Yes _____ No _____
 CHLORINATED HYDROCARBON USED: YES _____ NO _____
 SEWER CONNECTION ON PREMISES: YES _____ NO _____

REMARKS: A Q M D for Ovens + vapor degreaser

VIOLATIONS:

REFERRAL TO: _____ ACTION: _____ SURVEY CONDUCTED BY: _____



Rear SW

COUNTY OF LOS ANGELES DEPARTMENT OF HEALTH SERVICES
HAZARDOUS WASTE CONTROL PROGRAM

DATE: 5-19-69 R3

SIC. _____
 COMPANY NAME _____ STREET _____ CITY & ZIP _____ DISTRICT _____
 OWNER _____ PERSON INTERVIEWED & TITLE _____ PHONE NO. _____ NO. EMPLOYEES _____
 EMERGENCY NO. _____
 L.A. CO. PHL NO. _____ INDUSTRIAL WASTE NO. _____ EPA NO. _____
 TYPE OF FACILITY & DESCRIPTION OF OPERATION/PRODUCTS: _____
 SAFETY SHOWER _____
 EATING AREA _____
 TOILET & WASHING FACILITIES ADEQUATE _____
 PLANT SANITATION ADEQUATE _____

PROCESS	MATERIAL	TYPE	HAZARDOUS WASTE				I.H. HAZARD
			VOL/LBS.	STORAGE METHOD	DISPOSAL METHOD	MANIFEST CONTROL	
Carburizing of steel	Anhyd NH ₃		600 lbs tank	→ consumed in process			
Parts wiping	rags	oil solvent		→ covered cans → Prudential overall service			

NUMBER OF UNDERGROUND STORAGE TANKS: _____ ACCESS TO STORM INLET ON PREMISES: Yes ___ No ___
 VOLUME & TYPE OF WASTE IN UNDERGROUND TANK(S): _____ CHLORINATED HYDROCARBON USED: YES ___ NO ___
 PRIVATE DISPOSAL SYSTEMS ON PREMISES: YES ___ NO ___ SEWER CONNECTION ON PREMISES: YES ___ NO ___

REMARKS: _____

VIOLATIONS: _____

REFERRAL TO: _____ ACTION: _____ SURVEY CONDUCTED BY: _____

APPENDIX J

**MAP OF CHT BUILDING FROM CHT LETTER TO
EXXONMOBIL**

APPENDIX K

**NOVEMBER 4, 1993 LOS ANGELES COUNTY FIRE
DEPARTMENT REQUEST FOR SERVICE**



Request For Service

Form #RS1
rev 2.0 • 5/92

Los Angeles County
Fire Department
Prevention Bureau
Hazardous Waste
Control Program

Log # [yyynnnn]: 933143-118

Emergency Response Illegal Storage

Received by: LR Date: 11/4/93

Illegal Disposal Onsite Clean-up

Log entry by: LR Date: 11/4/93

Illegal Disposal Offsite Public Health License

Name: Continental Heat Treating Phone: _____

Address: 10643 Norwalk City: Santa Fe Springs

Substance: Solvents Zip: 90670

Scope: Attached Report indicates possible
illegal discharge into subsurface
from PCB metal degreaser wastewater
Inspection.

Status: _____

Section Assign To: SGV SFV SSE SB C M ER ENF SM Date: _____

Inspector Assign To: CB Assign By: JR Date: 11-5-93

Service Requested By: LR

Address: _____ Phone: _____

*you have
a call
(inf)*

11/4/93 Referred to enforcement fraction

APPENDIX L

**OCTOBER 6, 1994 LOS ANGELES COUNTY FIRE
DEPARTMENT HEALTH HAZARDOUS MATERIALS DIVISION
INDUSTRY SURVEY**

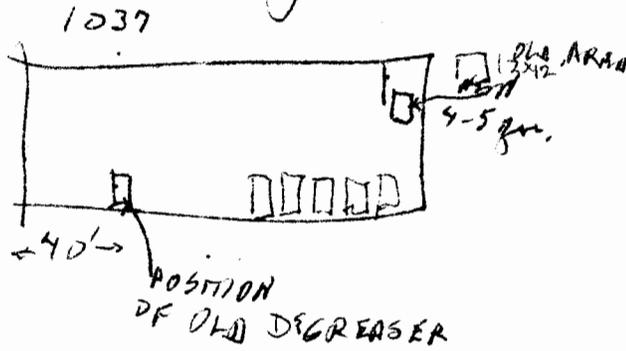
PHL#	606073	INDUSTRY SURVEY		
Code	101	SIC#	3398	
EPA#	CA0053850296	<input checked="" type="checkbox"/> Pending <input type="checkbox"/> NA		
DBA	CONTINENTAL HEAT		Phone	310-944-8808
Owner	JAMES TRATING INC		Interviewed	Ray Cross
Partner	G. STILL		Title	MECHANIC
Address	number	dir	street name	type
	10643	S	NORWALK BL	B1
unit #		City	SFS	Zip
			90670	
Mailing	SA		Start Date	'69
			# of employees	33
			# of shifts	3
			Operating hours	x5
Viol Rank	3	CA Waste Code	1 221	2 223
			3 213	4 211
<input type="checkbox"/> HWUT	Amt (PGT)	Pounds, Gallons, Tons; per quarter		600 G
<input type="checkbox"/> HRF	Mtl/Qty			
Referrals	<input type="checkbox"/> AQMD	<input type="checkbox"/> B&S	<input type="checkbox"/> Fire	<input type="checkbox"/> IW
	<input type="checkbox"/> OSHA	<input type="checkbox"/> SDHS	<input type="checkbox"/>	<input type="checkbox"/>

Viol 01 02 03 04 05 06 07 08 09 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33
34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 99

Visit Date	Start Time	Insp	Action	Time Invested	Special Circumstances
10/6/94	10:15	081	C-N	2:30	complaint 33143-118
10/9/94	10:15				with lanes halstern
1/1					with lanes halstern

Signature(s) *Project Baker*

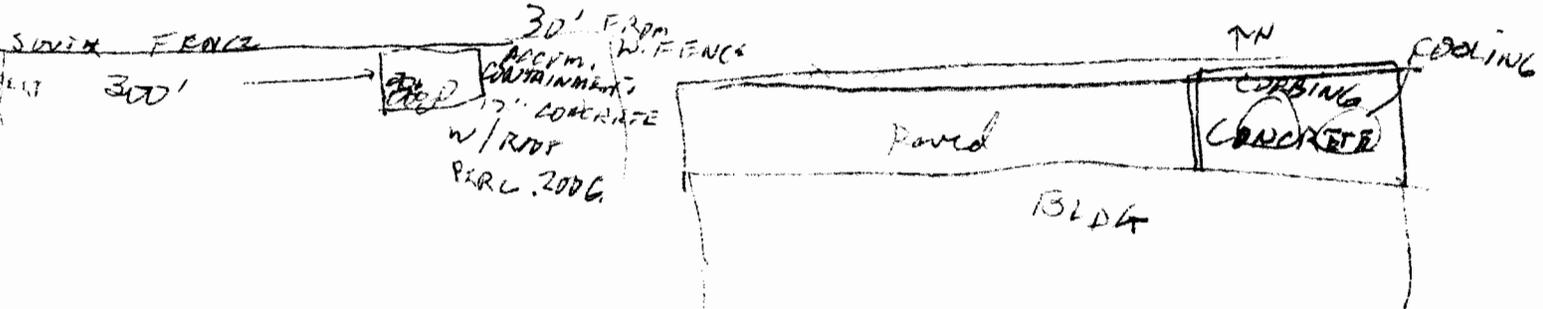
Action codes: A-Abate C-Complaint E-Enforce H-Hearing I-Insp M-site Mit N-NOV O-no viol P-PHL Inv R-Revisit S-Samples T-Time ext X-other Z-non-gen



FIN DEZ GRAMS
24 hr. 33-0206111

310 697-0903
DANNIS HUGIE

→ ROCHIEM.



APPENDIX M

UNDATED LOS ANGELES COUNTY FIRE DEPARTMENT SMALL QUANTITY GENERATOR CONTINGENCY PLAN

You are required by the California Code of Regulations, Title 22 to design, operate and maintain your business to minimize hazards to human health and the environment from any unplanned releases of hazardous materials.

Section 1 General Business Information

Name of Business CONTINENTAL HEAT TREATING CO. INC.

Address 10643 S. NORWALK B.VD City SANTA FE SPRINGS Zip 90670

Phone Number(310) 944 8808 Emergency Phone(310) 697 0903

Description of Business HEAT TREATING METAL PARTS

Number of Employees 30 Operating Hours(M-F) 24HRS M-F Sat Sun

Business Owner JAMES G. STULL Home Phone Number(714) 675 0408

Address 319 GRAND CANAL City BALBOA ISLAND Zip 92662

Property Owner ANNA HATHAWAY TRUST Phone Number(714) 661 6969 C.P.A.

Section 2 Hazardous Material / Waste Activities - List all Chemicals at your business.

RAW MATERIALS				HAZARDOUS WASTE	
Chemical Name or Trade Name*	Specific Usage	Quantity of Chemicals Stored	Manner of Storage	Quantity of Waste Stored	Manner of Storage
OIL	QUENCH OIL	500 GAL	TANK	300 GAL	DRUMS
PERCHLORETHLENE	DEGREASING	200 GAL	TANK	300 GAL	DRUMS
ACETONE	CLEANING	55	DRUM	0	0
AMMONIA	CARBONITRIDE	250	TANK	0	0

*Obtain from your Supplier the Material Safety Data Sheets for trade name chemical and attach to this form.

Section 3 Emergency Coordinator

Your company is required to list the names, addresses, and telephone numbers for your emergency coordinators(EC). The EC shall have the authority to commit resources and shall have the responsibility for coordinating the company's activities to mitigate an unplanned release of hazardous materials.

Name of EC DENNIS HUGE AfterHours Phone(310) 697 0903

Address 141 NORTH VIRGINIA ST. City LA HABRA Zip 90631

Alternate EC RAY CROSS AfterHours Phone(909) 674 1529

Address 29264 NORTHPOINTE City LAKE ELSINORE Zip 92530

Section 4 Notification

The EC must notify the following agencies in the event of a release, fire, or explosion which could threaten human health or the environment.

Fire 911 Health Haz Mat (213) 890-4317 Police 911

If the EC determines that evacuation of local areas may be advisable, the EC Shall notify the above agencies and the State Office of emergency Services at 1-800-852-7550.

List an Emergency Response Contractor you may use in the event of a major Hazardous Materials Spill.

Name PACIFIC ENVIRONMENTAL MGMT Emergency Phone(800) 777 - 3363

List all hospitals or clinics you may use in the event of hazardous materials exposures or injuries.

Hospital or Clinic HEALTH FIRST MEDICAL Phone(310) 949 - 9328

Address 11817 E. TELEGRAPH RD City SANTA FE SPRINGS

The EC shall report to the Health Haz Mat Division within 15 days all details of any incident where this contingency plan was activated.

Section 5 Emergency Procedures.

Attach a description of what your employees will do to prevent or stop a hazardous materials spill at your facility. (Training is required for procedures involving the handling of hazardous wastes.)

Section 6 Site Map

Attach a map of your company and indicate the locations of the following:

- *Layout work areas
- *Fire Extinguishers
- *Chemical Storage
- *Alarms - Telephone
- *Employee Protect'n Equip
- *First Aid Stations
- *Gas & electrical shut-off
- *Emergency Exits
- *Waste Storage
- *Offices & Restrooms
- *All Drains & Clarifiers
- *Emergency Shut-offs
- *Material Safety Sheets
- *Underground Tanks
- *Above Ground Tanks
- *Evacuation Routes
- *Emergency Equipment
- *Leak detection devices

*Indicate schools, residences, and public gathering places less than a block away from your facility.

Section 7 Additional Requirements

This Contingency Plan must be updated on a continuous basis and copied to our office. This Contingency Plan is designed for your use in the event of a hazardous materials incident. You must keep copies of your completed plan at your facility at all times. Review the contents of the plan with your employees and make the location of your completed plan known and accessible to them.

Send your completed Contingency plan to the following address:

County of Los Angeles Fire Department-Prevention Bureau/HEALTH HAZ MAT DIVISION
7300 E Alondra Blvd. #203, Paramount, Calif. 90723
Phone: (310) 790-1810, Fax: (310) 790-8002

Your Inspector is: GEORGE BAKER

CONTINGENCY PLAN - SUPPLEMENTAL INFORMATION

BUSINESS NAME CONTINENTAL HEAT TREATING CO. INC.

ADDRESS 10643 S. NORWALK BLVD. **CITY** SANTA FE SPRINGS **ZIP** 90670

Section 5: Emergency Procedures

In the event of a OIL spill, the following procedures will be followed.

Using DRY SORB the spilled material will be contained and prevented from going onto the ground or off the property.

The absorbed OIL & DRY SORB will be placed in a leak-proof container with tight fitting lid, labelled "Hazardous Waste" and held as hazardous waste until lawfully disposed.

Based on the:
 Material Safety Data Sheet
 Personal knowledge
 Other _____

of the Material, the following precautions should be taken when handling the spilled material:

Wear:
 Gloves and goggles
 Respirator
 Boots and Apron
 Other _____

See Reverse side, page 4 for Site Map

SECTION 6 SITE MAP

(See page 2, Section 6 for requested information, as applicable)

CONTINGENCY PLAN - SUPPLEMENTAL INFORMATION

BUSINESS NAME CONTINENTAL HEAT TREATING CO. INC.

ADDRESS 10643 S. NORWALK BLVD. CITY SANTA FE SPRINGS ZIP 90670

Section 5: Emergency Procedures

In the event of a PERCHLORETHLYENE spill, the

following procedures will be followed.

Using DRY SORB
the spilled material will be contained and prevented from going onto
the ground or off the property.

The absorbed DRY SORB
will be placed in a leak-proof container with tight fitting lid,
labelled "Hazardous Waste" and held as hazardous waste until
lawfully disposed.

Based on the:
 Material Safety Data Sheet
 Personal knowledge
 Other _____

of the Material, the following precautions should be
taken when handling the spilled material:

Wear:
 Gloves and goggles
 Respirator
 Boots and Apron
 Other _____

See Reverse side, page 4 for Site Map

CONTINGENCY PLAN - SUPPLEMENTAL INFORMATION

BUSINESS NAME CONTINENTAL HEAT TREATING CO. INC.

ADDRESS 10643 S. NORWALK BLVD. CITY SANTA FE SPRINGS ZIP 90670

Section 5: Emergency Procedures

In the event of a ACETONE spill, the

following procedures will be followed.

Using DRY SORB
the spilled material will be contained and prevented from going onto
the ground or off the property.

The absorbed ACETONE AND DRY SORB
will be placed in a leak-proof container with tight fitting lid,
labelled "Hazardous Waste" and held as hazardous waste until
lawfully disposed.

Based on the:

- Material Safety Data Sheet
- Personal knowledge
- Other _____

of the Material, the following precautions should be
taken when handling the spilled material:

Wear:

- Gloves and goggles
- Respirator
- Boots and Apron
- Other _____

See Reverse side, page 4 for Site Map

CONTINGENCY PLAN - SUPPLEMENTAL INFORMATION

BUSINESS NAME CONTINENTAL HEAT TREATING CO. INC.

ADDRESS 10643 S. NORWALK BLVD. CITY SANTA FE SPRINGS ZIP 90670

Section 5: Emergency Procedures

In the event of a AMMONIA (NH3) spill, the

following procedures will be followed.

Using DRY SORB
the spilled material will be contained and prevented from going onto
the ground or off the property.

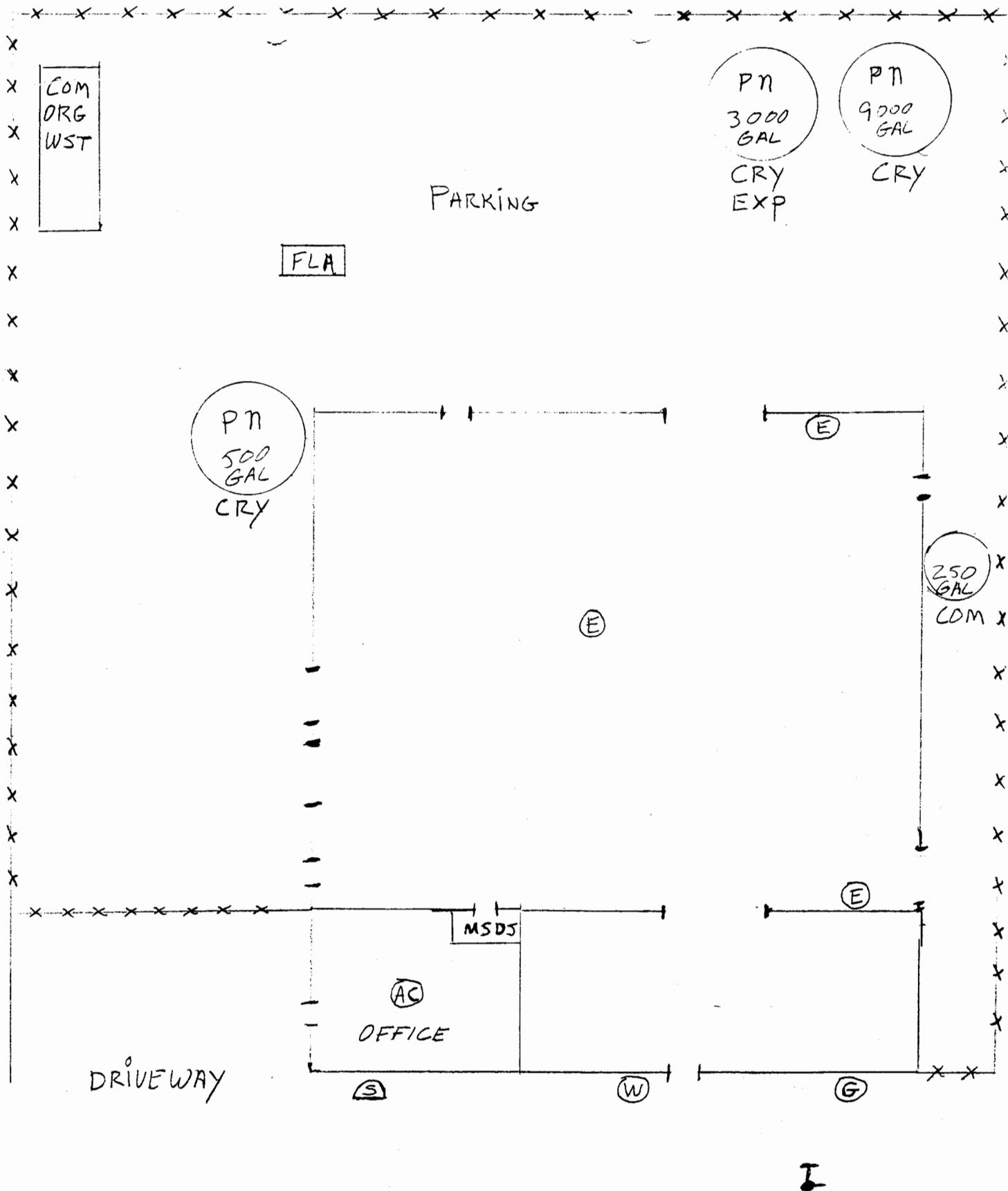
The absorbed DRY SORB
will be placed in a leak-proof container with tight fitting lid,
labelled "Hazardous Waste" and held as hazardous waste until
lawfully disposed.

Based on the:
 Material Safety Data Sheet
 Personal knowledge
 Other _____

of the Material, the following precautions should be
taken when handling the spilled material:

Wear:
 Gloves and goggles
 Respirator (APPROBED)
 Boots and Apron
 Other FULL PROTECTIVE CLOTHING

See Reverse side, page 4 for Site Map



10643 SO NORWALK BLVD.

APPENDIX N

**OCTOBER 19, 1995 LOS ANGELES COUNTY FIRE
DEPARTMENT CASE SYNOPSIS**

CONTINENTAL HEAT TREATING
October 19, 1995
Page 1

LOS ANGELES COUNTY FIRE DEPT/HHMD/SMU

CASE SYNOPSIS

Date: October 19, 1995
Log Number: 951668-377
Project Mgr: G Baker
SMU Priority: III
HW Generator: Yes
Generator #: 606073-101

Project: CONTINENTAL HEAT TREATING

Address: 10643 S. Norwalk Blvd, Santa Fe Springs, CA 90670

Contaminants: tetrachloroethylene and trichloroethylene

Depth to Ground Water: 35 - 65' **GW contamination:** unknown

Responsible Party: Continental Heat Treating
10643 S. Norwalk Blvd,
Santa Fe Springs, CA 90670
Phone #: (310)944-8808
Contact: James Stull

Consultant: Green Environmental, Inc.
6727 Greenleaf Ave,
Whittier, CA 90601
Phone #: (310)698-5338
Contact: Kent Green

Case Description:

On November 3, 1993, a complaint from the site operator of adjacent property to the north (lessee: Mobil Exploration) was received by this Department. The complaint alleged Continental Heat Treating was responsible for all or part of the chlorinated VOC contamination on Mobil's oil production lease property at 10607 S. Norwalk Blvd. The complaint was referred to Enforcement Unit for action on November 4, 1993. No enforcement activity by September 27, 1994, prompted a routine complaint inspection October 6, 1994.

Long-time employees all denied any improper disposal, leaking or spillage of vapor degreasing solvents anywhere on the property. Furthermore, the vapor degreaser had been moved from its original location in the shop. Eventually the old location of the degreaser was established. It appeared that this old location was close enough to the northern property line that leaks, sloppy

operations or spills could have migrated offsite despite employees' statements to the contrary. This inspection resulted in NOV #P14042, which included an order to provide a plan for corrective action at the old vapor degreaser location.

A single boring to a depth of 10' immediately adjacent but exterior to the concrete sump of the old industrial vapor degreaser was proposed. Three soil samples were taken as part of a preliminary assessment. The results of these samples are summarized as follows:

PCE AND TCE SOIL CONTAMINATION IN $\mu\text{g}/\text{Kg}$

BORING #	DEPTH (FT)	TRICHLORO-ETHYLENE (TCE)	TETRACHLORO-ETHYLENE (PCE)
B-1	6"	4759 ³	7514 ³
B-1	5'	21	290 ³
B-1	10'	66 ³	1855 ³

³ exceeds 10XMCL; the Los Angeles RWQCB risk-based cleanup standards for TCE and PCE (both of which are $5\mu\text{g}/\text{Kg}$) based on the VOC cleanup model.

The maximum TCE and PCE concentrations were 4759 and 7514 $\mu\text{g}/\text{Kg}$ respectively and the means were 1615 and 3220 $\mu\text{g}/\text{Kg}$ respectively.

No sample exceeded the HBSSL levels as carcinogens (PCE=8,500 and TCE=4,000 $\mu\text{g}/\text{Kg}$).

The Region IX USEPA residual PRG levels of PCE and TCE allowed (PCE(ind) = 25mg/Kg and PCE(res) = 7mg/Kg; TCE(ind) = 17mg/Kg and TCE(res) = 7.1mg/Kg) in industrial and residential soils were exceeded by PCE in the 6" sample only.

Applying the recent RWQCB model allowing the average attenuation factor of 255XMCL, three of the analyses would exceed the 1.275mg/Kg guideline concentration; PCE at 6" and 10', and TCE at 6".

The results of the preliminary assessment were sufficient documentation of a significant release to require a remedial investigation of the area. A letter was sent to Mr. Stull July 5, 1995, which directed him to determine the extent of the contamination and submit a site mitigation workplan. The workplan was prepared by Green Environmental and starts with a very limited scope investigation of the old vapor degreaser area.

Issues:

1. How much of the property needs to be evaluated in the RI?
2. Is it prudent to require a GW monitoring well at this juncture?
3. How much of the information (which the 10607 Norwalk B1 cleanup project has developed) could help economize this project?
4. Is it likely that the proposed borings and sampling protocol will define the vertical and lateral extent of the identified contamination?

Proposed Work Plan:

A work plan for the subsurface site investigation of the immediate area of the old vapor degreaser sump was received October 11, 1995.

A review of the submittal was completed and the following are missing or substantially defective for a complete property investigation. However, the workplan is directed only at the specified area in the immediate vicinity of the old vopor degreaser location.

- 1) A review of the historical use and existing information on the nature of the site mitigation problem.
- 2) Justification for the use of EPA method 8010 for sample analysis.
- 3) Justification for depth and array of borings and sampling.
- 4) Evaluation of public health and environmental concerns.
- 5) Investigation of hydrology and land use.
- 6) Justification for not boring to groundwater for the purpose of sampling for the known VOC contaminants.
- 7) A health and safety plan for the proposed investigation.
- 8) Justification for not submitting a work plan for at least one groundwater monitoring well, per RWQCB specifications, considering the underlying lithology of the site.

APPENDIX O

PREVIOUS CONSULTANT'S MAPS SHOWING EQUIPMENT STORAGE AND REPAIR AREA AT CHT PROPERTY

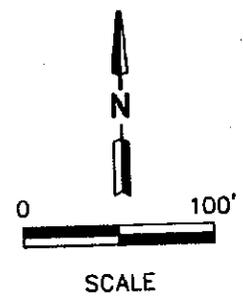
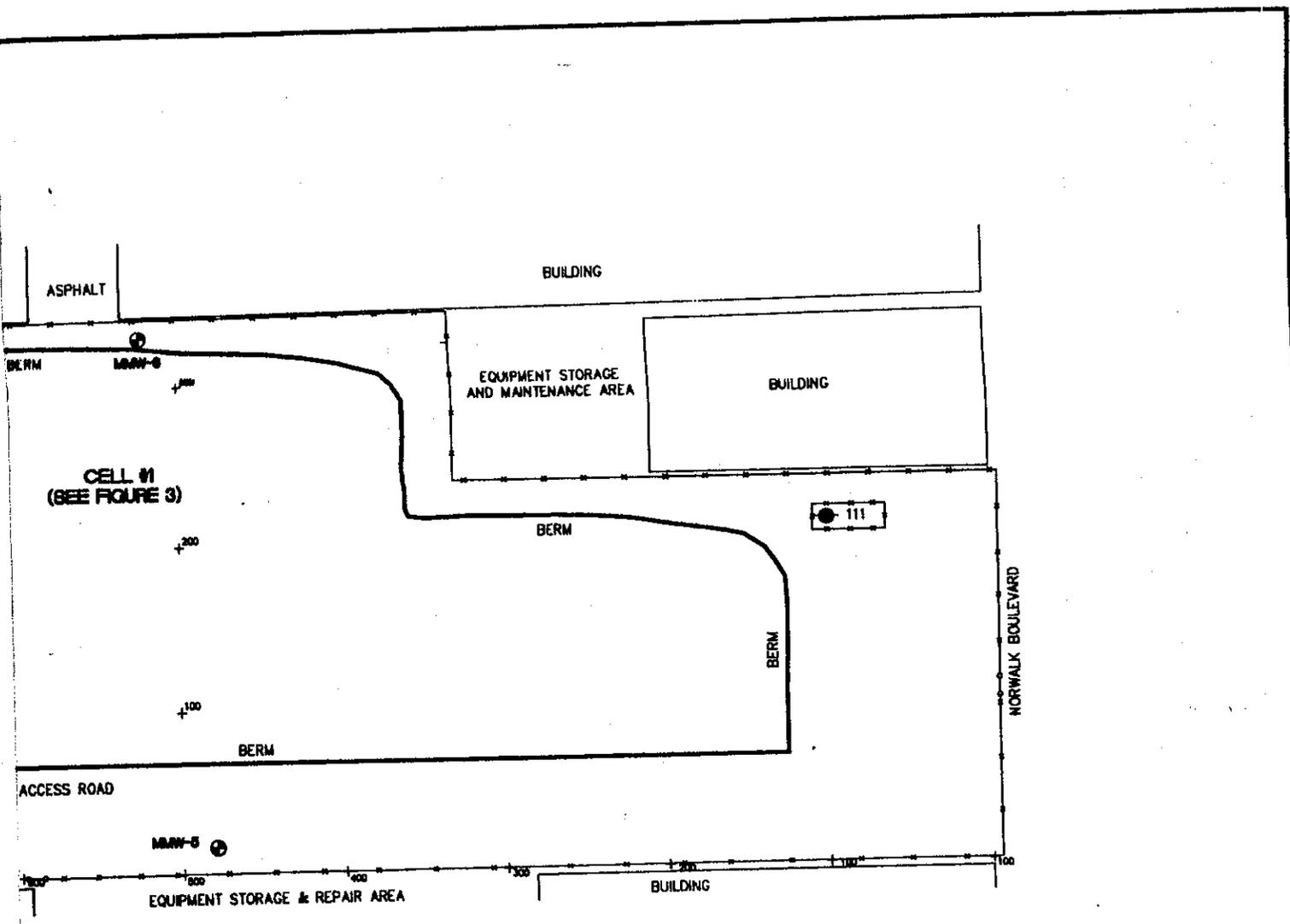
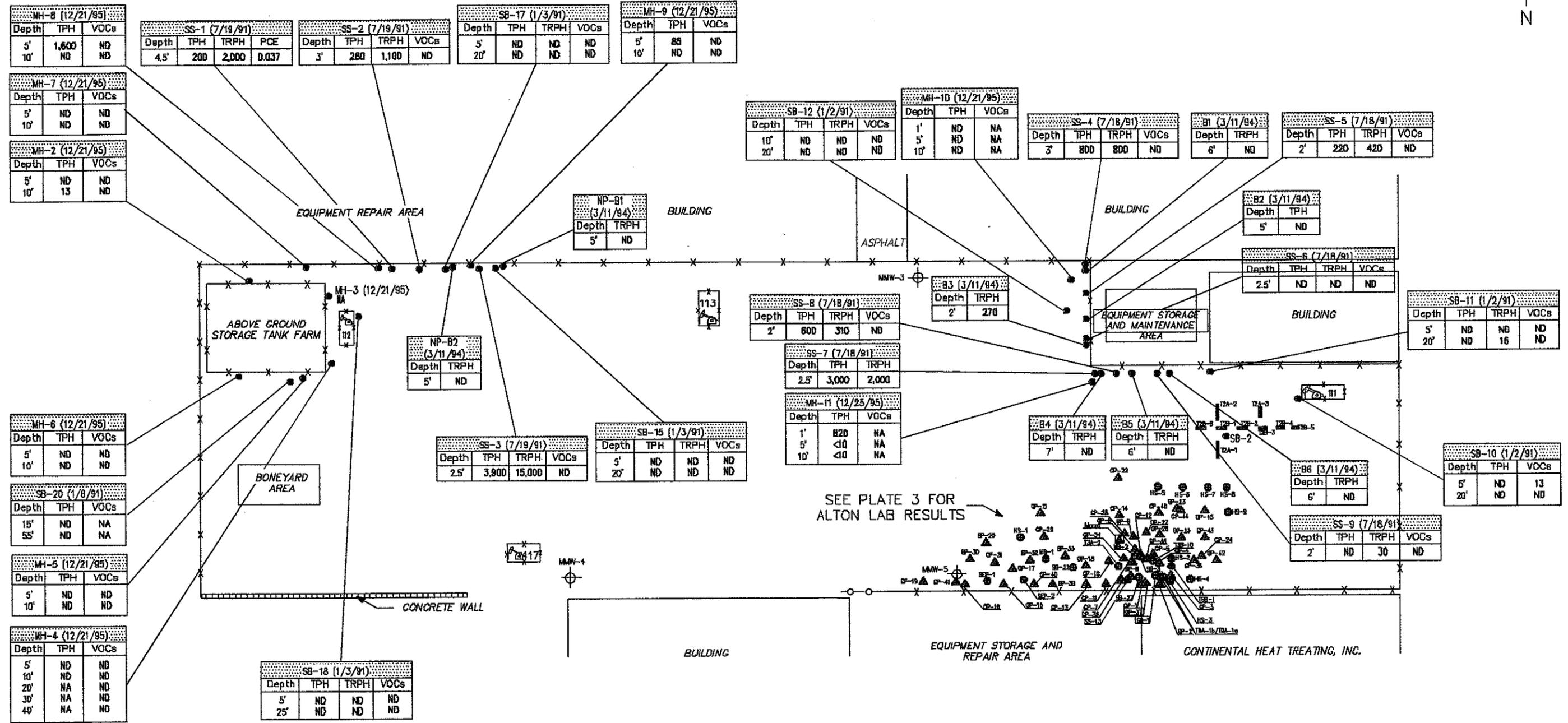




FIGURE 2
BIOREMEDIATION TREATMENT
CELL LOCATION
MOBIL JALK FEE PROPERTY
10607 NORWALK BOULEVARD
SANTA FE SPRINGS, CA

DRAWN BY E.S./P.M.	DATE 10/8/94	LISTED ON DRAWINGS	FINAL
CHECKED BY S.E.	DATE 10/9/94	UNLESS OTHERWISE SPECIFIED	REV.
APPROVED BY T.R.	DATE 10/8/94	SCALE	DRAWING NUMBER
SCALE	REFER		8-94_FIG.2



MH-8 (12/21/95)			
Depth	TPH	VOCs	
5'	1,600	ND	ND
10'	ND	ND	ND

SS-1 (7/19/91)			
Depth	TPH	TRPH	PCE
4.5'	200	2,000	0.037

SS-2 (7/19/91)			
Depth	TPH	TRPH	VOCs
3'	280	1,100	ND

SB-17 (1/3/91)			
Depth	TPH	TRPH	VOCs
5'	ND	ND	ND
10'	ND	ND	ND

MH-9 (12/21/95)		
Depth	TPH	VOCs
5'	88	ND
10'	ND	ND

MH-7 (12/21/95)		
Depth	TPH	VOCs
5'	ND	ND
10'	ND	ND

MH-2 (12/21/95)		
Depth	TPH	VOCs
5'	ND	ND
10'	13	ND

SB-12 (1/2/91)			
Depth	TPH	TRPH	VOCs
10'	ND	ND	ND
20'	ND	ND	ND

MH-10 (12/21/95)		
Depth	TPH	VOCs
1'	ND	NA
5'	ND	NA
10'	ND	NA

SS-4 (7/18/91)			
Depth	TPH	TRPH	VOCs
3'	800	800	ND

B1 (3/11/94)	
Depth	TRPH
6'	ND

SS-5 (7/18/91)			
Depth	TPH	TRPH	VOCs
2'	220	420	ND

B2 (3/11/94)	
Depth	TPH
5'	ND

SS-6 (7/18/91)			
Depth	TPH	TRPH	VOCs
2.5'	ND	ND	ND

SB-11 (1/2/91)			
Depth	TPH	TRPH	VOCs
5'	ND	16	ND
20'	ND	16	ND

MH-6 (12/21/95)		
Depth	TPH	VOCs
5'	ND	ND
10'	ND	ND

SB-20 (1/8/91)		
Depth	TPH	VOCs
15'	ND	NA
55'	ND	NA

MH-5 (12/21/95)		
Depth	TPH	VOCs
5'	ND	ND
10'	ND	ND

MH-4 (12/21/95)		
Depth	TPH	VOCs
5'	ND	ND
10'	ND	ND
20'	NA	ND
30'	NA	ND
40'	NA	ND

NP-B2 (3/11/94)	
Depth	TRPH
5'	ND

SS-3 (7/19/91)			
Depth	TPH	TRPH	VOCs
2.5'	3,900	15,000	ND

SB-15 (1/3/91)			
Depth	TPH	TRPH	VOCs
5'	ND	ND	ND
20'	ND	ND	ND

SS-8 (7/18/91)			
Depth	TPH	TRPH	VOCs
2'	600	310	ND

SS-7 (7/18/91)		
Depth	TPH	TRPH
2.5'	3,000	2,000

MH-11 (12/25/95)		
Depth	TPH	VOCs
1'	<10	NA
5'	<10	NA
10'	<10	NA

B3 (3/11/94)	
Depth	TRPH
2'	270

B4 (3/11/94)	
Depth	TRPH
7'	ND

B5 (3/11/94)	
Depth	TRPH
6'	ND

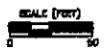
B6 (3/11/94)	
Depth	TRPH
6'	ND

SB-10 (1/2/91)		
Depth	TPH	VOCs
5'	ND	13
20'	ND	13

SS-9 (7/18/91)			
Depth	TPH	TRPH	VOCs
2'	ND	30	ND

SB-18 (1/3/91)			
Depth	TPH	TRPH	VOCs
5'	ND	ND	ND
20'	ND	ND	ND
30'	NA	NA	ND
40'	NA	NA	ND

SEE PLATE 3 FOR ALTON LAB RESULTS



NOTES
 TPH = total petroleum hydrocarbons. Reported TPH range are generally from C20 to C30.
 TPH = total recoverable petroleum hydrocarbons. VOCs = volatile organic compounds, detected by EPA Method 8240 or 8260. PCE = tetrachloroethene. 113/kg = milligrams per kilogram. ND = not detected or first indicated on official laboratory report. NA = not analyzed, measured, or collected. All soil sample, boring and geophone locations are estimated. Soil sampling data collected by Woodward-Clyde in 1995 in the eastern portion of the site and data for SB-2 and trenches were not available.

SOURCE
 McDermott, 1996 Decontamination Report for Petroleum Hydrocarbon Issues at Mobil Jalk Fee Property, September 20.

LEGEND

SS-2 (7/19/91)			
Depth	TPH	TRPH	VOCs
feet	mg/kg	mg/kg	mg/kg
5'	ND	ND	ND
20'	ND	ND	ND
30'	NA	NA	ND
40'	NA	NA	ND

- Soil Sample with Hydrocarbon concentrations (mg/kg) at Depth (feet)
- Monitoring Well
- 113 Operational Oil Well
- △ Geoprobe Boring
- Continuously Sampled Geoprobe Boring
- Soil Boring
- Trench
- X-X Chain Link Fence
- Gate

NOVEMBER 1996 TO JULY 1997 SITE ABANDONMENT SOIL SAMPLING LOCATIONS AND RESULTS

Mobil Jalk Fee Property
 10607 Norwalk Boulevard
 Santa Fe Springs, California

PLATE 1



APPENDIX P

**JULY 11, 1978 COUNTY OF LOS ANGELES PROJECT
PLANNING AND POLLUTION CONTROL DIVISION NOTICE**

COUNTY OF LOS ANGELES
DEPARTMENT OF COUNTY ENGINEER
PROJECT PLANNING AND POLLUTION CONTROL DIVISION

NOTICE

Date July 11, 1978

To Mr. TED INDA

File No. I-6585-14

Firm Name CONTINENTAL HEAT TREATING

I.W. Permit No. 4365

Location 10643 S. Norwalk Blvd., Santa Fe Springs

Remarks You are hereby instructed to clean the interceptors by July 18, 1978. Also maintain the interception in good operating condition at all times.

Please telephone the office indicated below for return inspection:

DEPARTMENT OF COUNTY ENGINEER
TEL: 866-7011 Ex. 255
16623 S. BELFLOWER BLVD.
BELFLOWER, CALIFORNIA 90706

~~Harvey T. Brandt~~
STEPHEN J. KOONCE
C. G. Brisley, Jr., Division Engineer

By [Signature]

yd 8
2-75

ADDRESS 10643 S. Norwalk Blvd., SANTA FE SPRINGS REGION 1H
INDUSTRY CONTINENTAL HEAT TREATING
S.M.D. 15.00 | No. 6585 | I.W.P. 4365 CLASS 201 DISPOSAL CODE 1
FACILITY Qott. 1000
LOCATION OF FACILITY East end of bldg. outside
COMPANY REPRESENTATIVE Janis Pratt PHONE 944-8808
SKETCH OR INSTRUCTIONS _____

Violated Conspecter *[Signature]*

APPENDIX Q

**MARCH 16, 1984 COUNTY OF LOS ANGELES DEPARTMENT
OF HEALTH SERVICES OFFICIAL NOTICE OF VIOLATION**

OFFICIAL NOTICE OF VIOLATION N042136



County of Los Angeles Department of Health Services
Community Health Services Environmental Management

[OFFICE ADDRESS]

TO Tender Industries - Attn: Dennis Hugel DATE 3/16/84
SUBJECT Hazardous Waste ADDRESS 10643 S NORWALK - SFS 90670
ADDRESS above

You are hereby directed to remove
oil from ground in your storage
area

This notice shall be complied with as required by: State Health and Safety Code, California Administrative Code, Los Angeles
County Ordinance No. 7583 City Ordinance No. _____, Other Code _____

CORRECTION DATE 4/23/84

LOS ANGELES COUNTY HEALTH OFFICER

RECEIVED BY U.S. MAIL

BY H. Walthers

MAIL SERVICE: FIRST CLASS CERTIFIED
H-777 (REV. 3/75)
740294

(White - VIOLATOR; Canary - SANITARIAN; Pink - DISTRICT DIRECTOR)

APPENDIX R

**DECEMBER 8, 1986 CITY OF SANTA FE SPRINGS PUBLIC
WORKS INVESTIGATION WORKSHEET**

INVESTIGATION WORKSHEET

DATE & TIME OF COMPLAINT

12/8/86 8:00

INVESTIGATION BY ON

John Hunter 12/8/86

Page 1 of 1

FIRM

COMPLAINANT

NAME CONTINENTAL HEAT TREATING
 ADDRESS 10643 Norwalk Blvd.
 Santa Fe Springs
 PHONE 944-8808

NAME Aziz
 ADDRESS City of Santa Fe Springs
 Public Works Department
 PHONE 868-0511 Ext. 244

COMPLAINT:

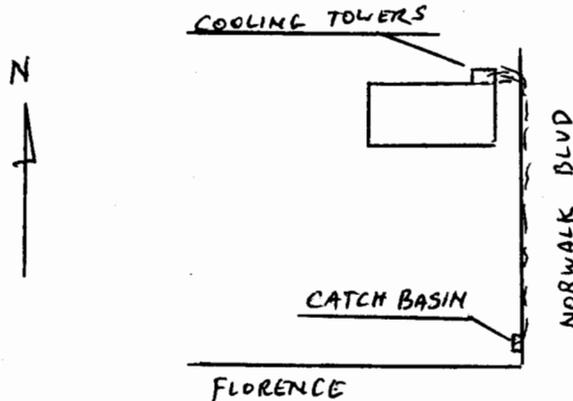
Above company is discharging industrial waste over the driveway.

REPORT:

Water with vivid blue-green streaks of color was flowing at several gallons per hour into Norwalk Blvd. from Continental's cooling tower area (See Sketch). The water flowed south, where it entered a catch basin at Florence Ave. The concrete was stained green in several areas where high water marks were deposited.

Mr. Ray Cross of Continental stated that a cooling tower pump had broken and the replacement pump was insufficient to handle the flow which caused the towers to overflow. The blue-green color was from a water treatment which is added at one part per thousand, no MSDS could be found, but, Mr. Cross claimed the water treatment contained no chrome and is considered non-hazardous.

Mr. Cross was instructed to (1) berm the cooling tower slab with sand, (2) clean the curb and gutter, and (3) to have the pump repaired or stop the flow immediately. Mr. Cross agreed to this and said the pump would be repaired this afternoon.



WITNESSES - CONTACTS

NAME ADDRESS POSITION PHONE

1	Ray Cross	Continental Heat Treating	Maint. Sup.	944-8808
2				

CALC. BY _____ DATE _____ PROJECT _____

CHECK BY _____ DATE _____

John Hunter

Continental Heating located on Norwalk Blvd, ~~at~~ N/o Florence, is discharging industrial waste over the driveway, please investigate and let me know the results. Actually let Richard Weaver know what are discharging and what action is being taken.

A212

12-3-86

APPENDIX S

**OCTOBER 5, 1987 CITY OF SANTA FE SPRINGS PUBLIC
WORKS INVESTIGATION WORKSHEET**

INVESTIGATION WORKSHEET

DATE & TIME OF COMPLAINT

10/05/87 11:00 a.m.

INVESTIGATION BY ON

John Hunter 10/05/87

Page 1 of 1

FIRM

COMPLAINANT

NAME Continental Heat Treating
ADDRESS 10643 Norwalk
Santa Fe Springs, CA 90670
PHONE

NAME Violation observed while
driving by.
ADDRESS
PHONE

COMPLAINT:

Blue-green water being discharged to the street.

REPORT:

The recent earthquake (10/04/87) had broken several pieces of equipment at this site and a discharge similar to that of 12/08/86 was occurring. Mr. Ray Cross was contacted and instructed to make the necessary repairs immediately.

APPENDIX T

**FEBRUARY 23, 1988 CITY OF SANTA FE SPRINGS PUBLIC
WORKS INVESTIGATION WORKSHEET**

INVESTIGATION WORKSHEET

DATE & TIME OF COMPLAINT

1500

2/23/88

INVESTIGATION BY
DAVE KLUNK

ON

2/23/88

1600

FIRM

COMPLAINANT

NAME Continental Heat Treating

City Hall

ADDRESS 10643 Norwalk Blvd

ADDRESS

PHONE 944 8808

PHONE

COMPLAINT: Discharging I.W. to street.

REPORT: Industrial Waste Water was discharged to the street when the blow down water circulation pump froze up. This allowed the blow down water to over fill its reservoir and spill down the driveway into the street. I.W. water had a pH of 9.0 and a low concentration of an algicide. Notice of violation # 0060 was given to Ray Cross. At which time he was also requested to submit plans to prevent future occurrences. Plans due 3/9/88. Because the company's project manager is on vacation an extension till 3/15/88 was granted. Plans to date include:

- ① piping overflow lines directly to the clarifier
- ② ~~the~~ installation of a berm around the blower/cooling tower.
- ③ temporary dirt berm and trenches have been installed to prevent flow to the street.

WITNESSES - CONTACTS

NAME

ADDRESS

POSITION

PHONE

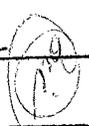
1	MIKE Bastian	Cont. Heat Treating	Project manager	9448808
2			Maintenance	

APPENDIX U

**MAY 19, 1989 COUNTY OF LOS ANGELES DEPARTMENT OF
HEALTH SERVICES NOTICE OF VIOLATION AND ORDER TO
COMPLY**

L... COUNTY HEALTH SERVICES
HAZARDOUS WASTE CONTROL PROGRAM

CASE NAME: Continental Heat Treating

DATE	TIME	INITIALS	REMARKS
5/19/89	9:50	JG, AB	<p>(1) Discharge of oil wastes both into asphalt top and into soil (SW corner near yard)</p> <p>(2) Unlabelled barrels that Mr. Frattini^{Bastian} indicated contained either PERC or waste oil</p> <p>(3) Incomplete manifests (no disposal facilities signed copy available)</p> <p>(4) Ticks & bungs missing on some oil waste barrels</p> <p>Has valid PHL </p>
7-25-89		D	<p>Manifest #9485618 7/10/89 for removal of oil/adhesives. Mr. Bastian states this was from both the rear area (soil) and asphalt 4 drums removed. All violations abated. Facility has a continuing problem with mineral oil drag out on the asphalt area.</p>

Owner James Stall

Date 5-19-89

Business Continental Heat Treating



Address 10643 S. Newwalk Blvd

Reply refer to:
2615 South Grand Avenue, Room 607
Los Angeles, CA 90007
(213) 744-3723

City, Zip Code 90070

James Olling

NOTICE OF VIOLATION AND ORDER TO COMPLY

The following conditions or practices observed at your facility are violations of the California Code of Regulations (CCR), Title 26, Division 22 or the California Health and Safety Code, Division 20, Chapter 6.5, (H&S) or both, which relate to the disposal, management, transportation, and storage of hazardous waste. YOU ARE DIRECTED TO CORRECT THE VIOLATIONS WITHIN THE TIMES SPECIFIED BELOW.

CORRECTION DATE

DISPOSAL:

5/19/89 1. Discontinue the disposal of hazardous waste to an unauthorized point(s). (H&S 25189.5). any waste oil onto the ground

2. Legally dispose of all hazardous waste and contaminated materials (H&S 25189.5)

3. Legally dispose of all stored hazardous waste and contaminated materials located at (H&S 25) discharged to

4. Submit to this office a copy of your facility's hazardous materials contingency plan and employee training plan. (CCR 67105, 67120-67126, 67140-67145)

6/19/89 reviewed by G.B.

MANAGEMENT:

5. Discontinue the transport of hazardous waste until the following have been met:

A. Obtain an EPA Identification Number from the State Department of Health Services at (916) 324-1781. (CCR 66472)

B. Complete a uniform Hazardous Waste Manifest or obtain a receipt when applicable under State Department of Health Services variance procedures. (H&S 25160 and 25143)

C. Transport all hazardous waste by a State registered hauler. (H&S 25163)

6. Submit to this office a copy of the completed hazardous waste manifest(s) used to dispose of all completed manifests (CCR 66328).

Note 7. Keep copies at your facility of all completed manifests, receipts or both for a minimum of three (3) years and make documents available for agency review. (CCR 66492)

STORAGE:

8. Discontinue the storage of hazardous waste for longer than 90 days without a permit from the State Department of Health Services. (CCR 66508)

6/19/89 9. Store all hazardous waste in compatible containers which are closed and in good condition. (CCR 66241 - 67243) keep lids + bung cover, don't over fill

6/19/89 10. Properly label all containers with the following: the words, "HAZARDOUS WASTE"; name and address of generator; hazardous properties; a composition and physical state of the waste; and the accumulation date. (CCR 66508) Label waste oil as waste oil

OTHER:

11. Provide this office with a site assessment and mitigation plan for the contamination at your facility.

12. Remove + legally dispose of oily surface in rear asphalted yard

Failure to fully comply with this Notice and Order may result in further legal action.

James Stall
Owner or Authorized Representative

James Olling / G.B.
Hazardous Materials Specialist

APPENDIX V

**OCTOBER 6, 1994 COUNTY OF LOS ANGELES FIRE
DEPARTMENT ORDER TO COMPLY**

Notice of Violation and Order to Comp



COUNTY OF LOS ANGELES • FIRE DEPARTMENT
Health Hazardous Materials Division

Owner	<u>STULL, JAMES G.</u>	CA 005 385 Date <u>9/16/94</u>
Business	<u>CONTINENTAL HEAT TREATING INC.</u>	Refer Reply To: <u>G. BAKER</u> HEALTH HAZARDOUS MATERIALS DIVISION 7300 Alondra Bl Ste 203 Paramount CA 90723 Office (310) 790-1810 Fax (310) 790-8002
Address	<u>10643* S. NORWALK BL.</u>	
City, ZIP Code	<u>SANTA FE SPRINGS 90670</u>	

Violations: The conditions or practices checked below represent a violation of the referenced section of Title 22, California Code of Regulations (22 CCR, Div 4.5, Ch 10, Sec 66260.1 et seq), and/or Health & Safety Code Chapter 6.5 (H&S, Div 20, Ch 6.5, Sec 25100 et seq) for which there are civil and criminal penalties. Time granted for correction of violations does not preclude any enforcement action by this Department or other agencies. You are directed to correct the violations within the times specified. Failure to do so will be considered an additional violation.

HAZARDOUS WASTE DETERMINATION

Correction Date / /

- 01 Provide a hazardous waste determination for (CCR 66262.11)
- _____
- _____
- _____

DISPOSAL

Correction Date / /

Discontinue the illegal disposal of hazardous waste and/or extremely hazardous waste to an unauthorized location (H&S 25189.5):

- 02 trash/dumpster/ground;
- 03 storm drain;
- 04 sewer/septic system with a permit;
- 05 unpermitted facility.
- 06 Discontinue the disposal of hazardous materials containers which are not legally empty (CCR 66261.7)
- _____
- _____
- _____

EPA NUMBER/PERMITS

Correction Date / /

Obtain the following from the Cal-EPA:

- 07 EPA Identification Number (contact Cal-EPA, 916-324-1781, for ID number) (CCR 66262.12);
- 08 on-site waste treatment/disposal permit for (CCR 66270.1)
- _____
- _____
- 09 extremely hazardous waste permit for handling and disposal of (CCR 67430.1)
- _____
- _____

STORAGE AND MANAGEMENT OF CONTAINERS

Correction Date / /

- Discontinue the on-site accumulation of hazardous waste:
- 10 longer than 90 days without an extension from DTSC (CCR 66262.34(c));
- 11 longer than 90 days after 100 kg has been accumulated (CCR 66262.34(d));
- 12 longer than 1 year or 90 days after 65 gallons has been accumulated at satellite storage.
- Label the waste container with the following:
- 22 the words, "HAZARDOUS WASTE" (CCR 66262.34(f));
- 14 description of contents / hazardous property of waste / generator name and address (CCR 66262.34(f));
- 13 accumulation start date (CCR 66262.34(f)).
- Provide hazardous waste containers which are:
- 15 in good condition (CCR 66265.171);
- 16 compatible with waste contents (CCR 66265.172);
- 17 closed/sealed during storage (CCR 66265.173);
- 18 handled/stored/segregated to minimize waste release/reaction (CCR 66265.177(c));
- 19 inspected at least weekly (CCR 66265.174).
- 25 Label hazardous materials properly within 10 days or handle as hazardous waste (CCR 66261.2(f)(1)).
- 26 Store hazardous materials properly within 96 hours or handle as hazardous waste (CCR 66261.2(f)(2)).
- 20 Properly manage used oil filters (CCR 66266.130).
- 21 Properly manage spent lead-acid storage batteries (CCR 66266.81).
- _____
- _____
- _____

TANK REGULATIONS

Correction Date / /

- 23 Discontinue storing incompatibles in the same tank (CCR 66265.199).
- 24 Inspect tank and tank equipment daily and document in the operating record of the facility (CCR 66265.195).
- _____
- _____

Authorized rep	<u>RAY CROSS</u>	Title	<u>MECHANIC</u>	Page 1 of <u>2</u>
Auth rep signature	<u>Ray Cross</u>	Inspected by	<u>[Signature]</u>	LACoFD HHMD • NV1-PAR • v2.6 • 6/93

P 14042

DBA/Name CONTINENTAL HEAT TREATING, INC. Owner STULL, JAMES G.

- 27 Obtain a storage permit for tanks greater than 5,000 gallons of hazardous waste (CCR 66262.34(d)).
- 28 Provide proper secondary containment for hazardous waste tank systems (CCR 66265.193).
- 29 Provide a written assessment for tank system (CCR 66262.192).

MANIFEST/RECEIPTS

Correction Date / /

- 50 Discontinue shipping hazardous waste without a manifest (CCR 66262.42).
- 57 Maintain manifest copy for three years from shipment (CCR 66262.40).
- 51 Maintain completed modified manifest/receipt(s) on site for at least three years (CCR 66263.42).
- 52 Maintain used oil manifest/receipt(s) on site for at least three years (H&S 25250.8).
- 53 Provide manifest copies to DTSC within 30 days (CCR 66262.23).
- 54 Complete all applicable sections of the manifest (CCR 66262.23).
- 55 Determine status of waste when TSD facility manifest copy is not received within 30 days (CCR 66262.42).
- 56 Send Exception Report to DTSC within 45 days (CCR 66262.42).
- 58 Provide proper documentation for excluded recyclable materials (H&S 25143.10).

RECORDKEEPING

Correction Date / /

- 30 Keep waste analysis/test records for at least three years (CCR 66262.40(e)).
- 31 Send Biennial Report to DTSC (CCR 66262.41).
- 32 Retain copies of biennial and exception reports for at least three years (CCR 66262.40(b)).

TRAINING

Correction Date / /

- 33 Provide a training program (CCR 66265.16).
- 34 Train and supervise personnel within six months of hire date and retrain as needed (CCR 66265.16(b)).
- 36 Keep training records on site (CCR 66265.16(d)).
- 37 Maintain training records until closure of facility or for at least three years (for former employees) (CCR 66265.16(e)).

TRANSPORT

Correction Date / /

- 59 Discontinue shipping hazardous waste by transporters lacking an EPA ID No. (CCR 66262.12).
- 60 Discontinue shipping hazardous waste to TSD facilities lacking an EPA ID No. (CCR 66262.12).

CONTINGENCY PLAN/BUSINESS PLAN

Correction Date 10/16/94

- 38 Submit a contingency/business plan (CCR 66265.53(b)).
- 39 Complete contingency/business plan (CCR 66265.52).
- 40 Maintain copy of plan on site (CCR 66265.53).
- 41 Amend and update plan as necessary (CCR 66265.54).
- 42 Assign Emergency Coordinator to facility (CCR 66265.55).

OTHER

Correction Date 10/06/94

- 61 Provide Hazardous Waste Management Performance Plan and Report for review (H&S 25244.21).
- 62 Provide a copy of LDR notice/certification for each shipment of restricted hazardous waste (CCR 66268.7).
- 63 Provide a corrective action plan for unauthorized releases of hazardous waste or constituents (H&S 25187).
- 64 Legally remove hazardous waste/contamination before the closure of the facility (CCR 66265.11).

SUBMIT UPDATE TO THIS OFFICE BY 11/6/94 (NOV 6, 1994)

PREPAREDNESS AND PREVENTION

Correction Date / /

- 43 Maintain facility to minimize possibility of fire or release of hazardous waste or constituents (CCR 66265.31).
- 44 Provide an internal communications or alarm system (CCR 66265.32(a)).
- 45 Provide a device capable of calling outside emergency help (CCR 66265.32).
- 46 Provide access to communication/alarm system during waste handling (CCR 66265.34).
- 47 Provide fire/spill control or decontamination system (CCR 66265.32(c)).
- 48 Test and maintain emergency equipment (CCR 66265.33).
- 49 Maintain required aisle space (CCR 66265.35).

#63 EVALUATE THE AREA VICINITY 120' W. OF THE EAST WALL AND 30' S. OF THE NORTH WALL FOR SOIL CONTAMINATION BY CHLORINATED HYDROCARBON SOLVENT

PROVIDE PLAN TO THIS OFFICE NO LATER THAN NOV 20, 1994.

Authorized rep <u>RAY CROSS</u>	Title <u>MECHANIC</u>	Page 2 of <u>2</u>
Auth rep signature <u>Ray Cross</u>	Inspected by <u>George T. Belin</u>	LACoFD HHMD • NV1 • v2.6 • 6/93

APPENDIX W

**MAY 25, 2006 CITY OF SANTA FE SPRINGS FIRE
DEPARTMENT INSPECTION REPORT & NOTICE OF
VIOLATION**



City of Santa Fe Springs Fire Department
 Environmental Protection Division ■ Certified Unified Program Agency
 11300 Greenstone Ave ■ Santa Fe Springs ■ CA 90670 (562) 944-9713 FAX (562) 941-1817
INSPECTION REPORT & NOTICE OF VIOLATION



Continental Heat Treating
 10843 Norwalk
 SFS, CA 90670

HMBP
 HWG
 SW
 USC

RMP
 SPCC
 SW
 Recy.

The following items, if applicable, have been inspected. This document constitutes a Summary of Violations and Notice to Comply if the violation (V) column is checked.
 Reference: Titles 19 and 22 of the California Code of Regulations (CCR), Chapters 6.5, 6.67, and 6.95 of the Health and Safety Code (HSC), and Chapter 97 of the City Code.

HAZARDOUS WASTE GENERATOR			HAZARDOUS WASTE GENERATOR		
V	SUBJECT	REFERENCE	V	SUBJECT	REFERENCE
	Hazardous waste generator permit	City Ordinance 97.400		Hazardous waste analysis retained for 3 yrs	CCR 66262.40(c)
	EPA ID number (call DTSC 800-618-6942)	CCR 66262.12(a)		Personnel training for LQG	CCR 66265.16
	Hazardous waste determination	CCR 66262.11		Personnel training for generators of waste	CCR 66262.34(d), CFR
	Proper disposal of hazardous waste	HSC 25189.5(a)		Contingency plan for LQG	CCR 66265.51
	Reckless management of hazardous waste	HSC 25189.6		Emergency preparedness/prevention	CCR 66265.30
	Hazardous waste labeling	CCR 66262.34(f)		SB14 requirements for LQGs	CCR 67100.3
	Hazardous waste accumulation time	CCR 66262.34(a-d)		Biennial report for RCRA LQGs	CCR 66262.40
	Retrograde/speculative accumulation	CCR 66262.10		Excluded recyclable material management	HSC 25143.2-9
	Satellite accumulation	CCR 66262.34(e)		Recyclable material report	HSC 25143.10
	Containers leaking or not in good condition	CCR 66265.171		Proper management of Universal Waste	CCR 66273
	Hazardous waste container closed	CCR 66265.173(a)		Other hazardous waste violation(s)	
	Separation of incompatibles	CCR 66265.177		HAZARDOUS MATERIALS BUSINESS PLAN	
	Management of empty containers	CCR 66261.7		HMBP established and filed	HSC 25503.5
	Used oil management	CHSC 25250.4		Inventory and plot plan accurate	HSC 25509
	Used oil filter management	CCR 66266.130		Owner/operator information accurate	Ch. 6.95, HSC
	Contaminated textile management	HSC 25144.6		INDUSTRIAL WASTE	
	Container storage inspection - weekly	CCR 66265.174		Discharging industrial waste w/o a permit	City Ordinance, Ch. 97
	Tank inspection - daily	CCR 66265.195		Other violation(s)	
	Tank operating requirements	CCR 66265.194		STORM WATER	
	Hazardous waste transported w/o manifest	CCR 66262.20-23		Storm water permit required (GIASP)	City Ordinance, Ch. 52
	Hazardous waste manifest complete	CCR 66262.23(a)		Failure to implement BMPs	City Ordinance, Ch. 52
	Manifest copies to DTSC	CCR 66262.23(a)(4)		ABOVE GROUND PETROLEUM STORAGE	
	Manifest copies retained for 3 years	CCR 66262.40(a)		SPCC plan complete per requirements	CHSC 25270.5(c)
	Consolidated manifest requirements	HSC 25160.2		UNIFORM FIRE CODE	
	LDR documents retained onsite	CCR 66268.7(a)(6)		Uniform Fire Code	Uniform Fire Code

No hazardous waste violation(s) observed on date of inspection

Notice to Comply: The violation(s) must be corrected by 6-25-06.

Return "Certificate of Compliance" \$ _____ Fee after this date

Attention: The item(s) checked are in violation. A re-inspection may occur at any time to verify compliance. Non-compliance could result in re-inspection fees, permit revocation, and/or administrative/civil/criminal penalties. Any time granted for correction of the violation(s) does not preclude any enforcement action by this Department or other agencies. The giving of this notice and recent inspection of your facility is not a representation by the City of Santa Fe Springs that no other violations exist on your premises.

Program(s) inspected: HMBP HWG TP PBR RECYCLER UST CAL ARP SPCC SW IW UFC

Inspection type: Routine Other HWG Status: RCRA LQG RCRA SQG CA ONLY RECYCLER CESQG Silver SPG

Inspection Category: Single Program Combined Joint Integrated/Multi-Media Number of Employees: ~50

Notes: On 5-25-06 Continental Heat Treating was inspected. Facility heat treated metal parts and does copper plating on various parts.

28. Continental Heat Treating violated 22CCR66265.16 by not having a training program that meets all the requirements for Large Quantity Generators (LQGs). Facility must implement a program which identifies employees that handle hazardous waste, their job title, job description, and a description of the training they receive. Implement a training program that meets LQG requirements and provide documentation to the Fire Dept.

I have read and understand the above stated violations. After these violations have been corrected, I will sign and return the "Certification of Compliance" form and submit any other required or requested information.

Signature of responsible party
Michael Cole

Print name
Charlie Sotelo

Date
5-25-06



City of Santa Fe Springs Fire Department
 Environmental Protection Division ■ Certified Unified Program Agency
 11300 Greenstone Ave ■ Santa Fe Springs ■ CA 90670 (562) 944-9713 FAX (562) 941-1817
INSPECTION REPORT & NOTICE OF VIOLATION



BUSINESS <u>Continental Heat Treating</u>	SITE ADDRESS <u>10643 Norwalk</u>
CONTACT <u>Charles Sotelo</u>	
INSPECTED BY <u>Richard Kallman</u>	DATE INSPECTED <u>5-25-06</u>

Reference: Titles 19 and 22 of the California Code of Regulations (CCR), Chapters 6.5, 6.67, and 6.95 of the Health and Safety Code (HSC), and Chapter 97 of the City Code.

- 32. Continental Heat Treating must ensure their waste minimization plan (SR14 plan) is up to date in accordance with 22CCR67100.3. Facility has plan on site, but it appears it was last updated in 1999.
- 37. Continental Heat Treating violated 22CCR67100.175(b)(5) by having liquid waste in their Copper plating line Secondary containment. Spills into Secondary containment must be removed as quickly as possible and in all cases, within 24 hours. Facility must pump out containment and appropriately manage spilled material/waste.
- 43. Continental Heat Treating violated City Ordinance Chapter 52 by having oil on the 3rd stage of their clarifier. Oil must be removed from the clarifier and maintained such that oil is kept out of the sewer system.
- 44. Continental Heat Treating must ensure their stormwater pollution prevention plan is up to date. The plan on site was dated 1997. Existing plan is accurate and still meets regulatory requirements.
- 46. Observation: Continental Heat Treating has in excess of 1,320 gallons of petroleum products stored aboveground. Facility is subject to SPC requirements.

Correct Violations by 6-25-06

Charles Sotelo

5-25-06

APPENDIX X

**MAY 9, 2007 CITY OF SANTA FE SPRINGS FIRE
DEPARTMENT INSPECTION REPORT & NOTICE OF
VIOLATION**



City of Santa Fe Springs Fire Department
Environment Protection Division ■ Certified Unified Program Agency
 11300 Greenstone Ave ■ Santa Fe Springs ■ CA 90670 (562) 944-9713 FAX (562) 941-1817
INSPECTION REPORT & NOTICE OF VIOLATION



Continental Heat Treating
 10643 Norwalk
 SFS, CA 90670

KHMBP
 HWG - non-RCRA LQG
 SW
 UFC

SW
 SW
 Recy

The following items, if applicable, have been inspected. This document constitutes a Summary of Violations and Notice to Comply if the violation (V) column is checked.
 Reference: Titles 19 and 22 of the California Code of Regulations (CCR), Chapters 6.5, 6.67, and 6.95 of the Health and Safety Code (HSC), and Chapter 97 of the City Code.

HAZARDOUS WASTE GENERATOR				HAZARDOUS WASTE GENERATOR			
V	SUBJECT	REFERENCE		V	SUBJECT	REFERENCE	
	Hazardous waste generator permit	City Ordinance 97.400		27	Hazardous waste analysis retained for 3 yrs	CCR 66262.40(c)	
	EPA ID number (call DTSC 800-618-6942)	CCR 66262.12(a)		28	Personnel training for LQG	CCR 66265.16	
	Hazardous waste determination	CCR 66262.11		29	Personnel training for generators of waste	CCR 66262.34(d), CFR	
	Proper disposal of hazardous waste	HSC 25189.5(a)		30	Contingency plan for LQG	CCR 66265.51	
	Reckless management of hazardous waste	HSC 25189.6		31	Emergency preparedness/prevention	CCR 66265.30	
	Hazardous waste labeling	CCR 66262.34(f)		32	SB14 requirements for LQGs	CCR 67100.3	
<input checked="" type="checkbox"/>	Hazardous waste accumulation time	CCR 66262.34(a-d)		33	Biennial report for RCRA LQGs	CCR 66262.40	
	Retrograde/speculative accumulation	CCR 66262.10		34	Excluded recyclable material management	HSC 25143.2-9	
	Satellite accumulation	CCR 66262.34(e)		35	Recyclable material report	HSC 25143.10	
	Containers leaking or not in good condition	CCR 66265.171		36	Proper management of Universal Waste	CCR 66273	
	Hazardous waste container closed	CCR 66265.173(a)		37	Other hazardous waste violation(s)		
	Separation of incompatibles	CCR 66265.177		HAZARDOUS MATERIALS BUSINESS PLAN			
	Management of empty containers	CCR 66261.7		38	HMBP established and filed	HSC 25503.5	
	Used oil management	CHSC 25250.4		39	Inventory and plot plan accurate	HSC 25509	
	Used oil filter management	CCR 66266.130		40	Owner/operator information accurate	Ch. 6.95, HSC	
	Contaminated textile management	HSC 25144.6		INDUSTRIAL WASTE			
	Container storage inspection - weekly	CCR 66265.174		42	Discharging industrial waste w/o a permit	City Ordinance, Ch. 97	
	Tank inspection - daily	CCR 66265.195		43	Other violation(s)		
	Tank operating requirements	CCR 66265.194		STORM WATER			
	Hazardous waste transported w/o manifest	CCR 66262.20-23		44	Storm water permit required (GIASP)	City Ordinance, Ch. 52	
	Hazardous waste manifest complete	CCR 66262.23(a)		45	Failure to implement BMPs	City Ordinance, Ch. 52	
	Manifest copies to DTSC	CCR 66262.23(a)(4)		ABOVE GROUND PETROLEUM STORAGE			
	Manifest copies retained for 3 years	CCR 66262.40(a)		46	SPCC plan complete per requirements	CHSC 25270.5(c)	
	Consolidated manifest requirements	HSC 25160.2		UNIFORM FIRE CODE			
	LDR documents retained onsite	CCR 66268.7(a)(6)		47	Uniform Fire Code	Uniform Fire Code	

No hazardous waste violation(s) observed on date of inspection

Notice to Comply: The violation(s) must be corrected by 6-10-07.

Return "Certificate of Compliance" \$ Fee after this date

Attention: The item(s) checked are in violation. A re-inspection may occur at any time to verify compliance. Non-compliance could result in re-inspection fees, permit revocation, and/or administrative/civil/criminal penalties. Any time granted for correction of the violation(s) does not preclude any enforcement action by this Department or other agencies. The giving of this notice and recent inspection of your facility is not a representation by the City of Santa Fe Springs that no other violations exist on your premises.

Program(s) inspected: HMBP HWG TP PBR RECYCLER UST CAL ARP SPCC SW IW UFC

Inspection type: Routine Other HWG Status: RCRA LQG RCRA SQG CA ONLY RECYCLER CESQG Silver SPG

Inspection Category: Single Program Combined Joint Integrated/Multi-Media Number of Employees: 60

Notes: On 5-9-07 Continental Heat Treating was inspected. Facility utilizes furnaces to heat treat parts and copper plates various parts as well.

7. Continental Heat Treating violated 22CCR66262.34 by storing waste for longer than allowed. 1 55 gallon drum of waste filters was stored in the Plotting Department storage area. The drum had an accumulation start date of 11-6-06. Continental Heat Treating must not store waste for more than 90 days unless waste storage meets satellite accumulation requirements.

35. Continental Heat Treating violated CA HSC 25143.10 by not completing a recyclable material report. This report is due July 1 of even numbered years and was last completed in 2004. Continental Heat Treating must complete this report and submit it to the Fire Department.

I have read and understand the above stated violations. After these violations have been corrected, I will sign and return the "Certification of Compliance" form and submit any other required or requested information.

Signature of responsible party: Charles Sotelo Print name: Charles Sotelo Date: 5-10-07



City of Santa Fe Springs Fire Department
 Environmental Protection Division ■ Certified Unified Program Agency
 11300 Greenstone Ave ■ Santa Fe Springs ■ CA 90670 (562) 944-9713 FAX (562) 941-1817
INSPECTION REPORT & NOTICE OF VIOLATION



BUSINESS <u>Continental Heat Treating</u>	SITE ADDRESS <u>10643 Norwalk</u>
CONTACT <u>Charlie Sotelo</u>	
INSPECTED BY <u>Richard Kallman</u>	DATE INSPECTED <u>5-9-07</u>

Reference: Titles 19 and 22 of the California Code of Regulations (CCR), Chapters 6.5, 6.67, and 6.95 of the Health and Safety Code (HSC), and Chapter 97 of the City Code.

39. Continental Heat Treating violated HSC 25509 by not having an accurate business plan inventory on site. A cylinder of nitrogen/hydrogen gas used by the ER unit was not listed as well as welding gas. Continental Heat Treating must determine if the quantity of these materials requires a chemical inventory form to be submitted. Updates shall be sent to the Fire Department.

43. Continental Heat Treating violated City Code 97.60 section 20.30.610 by failing to maintain pretreatment equipment in good working order. The third stage of the clarifier had oil in it. Continental Heat Treating must maintain the clarifier to prevent oil from entering the sewer system.

47A Continental Heat Treating violated USC 8001.4.7 by not maintaining equipment in good working order. The flow meter associated with Furnace N2 was found to be leaking ammonia. Continental Heat Treating must stop the ammonia leak and ensure equipment is maintained to prevent leaks.

47B Continental Heat Treating violated USC 8001.11.8 by having incompatible materials stored together. Acids & bases were stored together in the storage area for the plating department. Incompatible materials must be separated by 20 feet or a non-combustible partition.

Other: Continental Heat Treating violated 19CCR 2755.6 by not completing a CalARP self Audit. Self Audits are required to be completed every three years. The CalARP was initially submitted 4-29-04, so the audit was due to be completed by 4-29-07. Continental Heat Treating must complete the audit and send a copy of the audit results to the Fire Department.

Correct Violations by 6-10-07

	<u>Charlie Sotelo</u>	<u>5-10-07</u>
Signature	Name	Date

APPENDIX Y

**MAY 8, 2012 CITY OF SANTA FE SPRINGS FIRE
DEPARTMENT INSPECTION REPORT & NOTICE OF
VIOLATION**



Santa Fe Springs Department of Fire-Rescue
Environmental Protection Division ■ Certified Unified Program Agency
 11300 Greenstone Ave ■ Santa Fe Springs ■ CA 90670 (562) 944-9713 FAX (562) 941-1817
INSPECTION REPORT & NOTICE OF VIOLATION



Business name Continental Heat Treating
 Address 10643 Norwalk
 Santa Fe Springs, CA 90670

HMBP
 NIOSH
 APCA
 CalARP
 SW
 IW
 CFC

The following items, if applicable, have been inspected. This document constitutes a Summary of Violations and Notice to Comply if the violation (V) column is checked. Reference: Titles 19, 22, and 23 of the California Code of Regulations (CCR), Chapters 6.5, 6.67, 6.95 of the Health and Safety Code (HSC), The California Fire Code and Chapter 97 of the City Code.

Inspector(s) Richard Gallman Inspection date 5/8/12
 Inspection consent given by Charlie Sotelo Contact phone number (562) 944-5306

HAZARDOUS WASTE GENERATOR				HAZARDOUS WASTE GENERATOR			
V	SUBJECT	REFERENCE		V	SUBJECT	REFERENCE	
	Hazardous waste generator permit	City Code 97.400		26	Contingency plan for LQG	CCR 66265.51	
	EPA ID number/CA Waste ID number	CCR 66262.12 (a)		27	Emergency preparedness/prevention LQG	CCR 66265.30	
	Hazardous waste determination	CCR 66262.11		28	SB14 requirements for LQGs	CCR 67100.3	
	Proper disposal of hazardous waste	HSC 25189.5 (a)		29	Excluded recyclable material management	HSC 25143.2 - .9	
	Reckless management of hazardous waste	HSC 25189.6 (a)		30	Proper management of Universal Waste	CCR 66273.13	
	Hazardous waste labeling	CCR 66262.34 (f)		HAZARDOUS MATERIALS BUSINESS PLAN			
	Haz Waste/Satellite accumulation time	CCR 66262.34 (a-d)/(e)		31	HMBP established, implemented, filed	HSC 25503.5	
	Retrograde/speculative accumulation	CCR 66261.2 (d)		32	Minimum standards for business plans	CCR 2729	
	Hazardous waste containers closed	CCR 66265.173 (a)		INDUSTRIAL WASTE			
	Containers mislabeled, deteriorated, etc.	CCR 66262.2 (f)		33	Generating industrial waste w/o a permit	City Code, Ch. 97	
	Container storage inspection - weekly	CCR 66265.174		CALIFORNIA FIRE CODE			
	Management of empty containers	CCR 66261.7		34	Maximum allowable hazardous materials	CFC 2703.1.1	
	Used oil management	HSC 25250.4		35	Separation of incompatible materials	CFC 2703.9.8	
	Used oil filter management	CCR 66266.130		36	Secure compressed gas cylinders	CFC 303	
	Contaminated textile management	HSC 25144.6		37	Fire protection system maintenance	CFC 901.6.1	
	Tank inspection - daily	CCR 66265.195		38	Service and tag kitchen hood system	CFC 904.11.6.4	
	Tank operating requirements	CCR 66265.194		39	Clearance from electrical control panels	CFC 605.3	
	Manifest general requirements	CCR 66262.20-23		40	Exits free from obstructions	CFC 1028	
	Manifest completed	CCR 66262.23 (a)		STORM WATER			
	Consolidated manifest requirements	HSC 25160.2		41	Storm water permit required (GIASP)	City Code, Ch. 52	
	Manifest copies retained for 3 years	CCR 66262.40 (a)		42	Failure to implement BMPs	City Code, Ch. 52	
	Biennial report for RCRA LQG	CCR 66262.40 (b)		CALARP			
	Hazardous waste analysis retained 3 years	CCR 66262.40 (c)		43	CalARP required	19 CCR 2745.1 (b)(3)	
	Personnel Training Plan for LQGs	CCR 66265.16		OTHER VIOLATION			
	Personnel training for generators of waste	CCR 66262.34 (d), 40CFR		44	Other violation(s)		

Program(s) inspected: HMBP HWG TP RECYCLER UST CAL ARP APSA SW IW CFC
 Inspection type: Routine Other HWG Status: RCRA LQG Non RCRA LQG RCRA SQG CA ONLY RECYCLER CESQG Silver SPG
 Inspection Category: Single Program Combined Integrated/Multi-Media Number of Employees: 80

Notes: on 5/8/12 Continental Heat Treating was inspected. Facility had ~~metal~~ metal parts and has a small plating line.

15. Continental Heat Treating violated 22CCR262.20 by not having a signed copy of manifest # 009532358 JJK. Facility must obtain a copy of the signed manifest file an exception report.

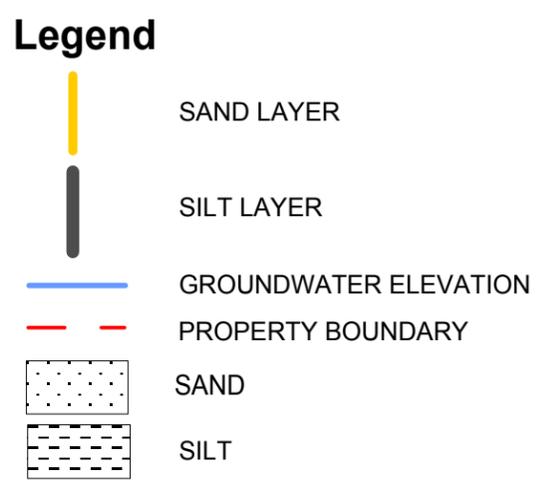
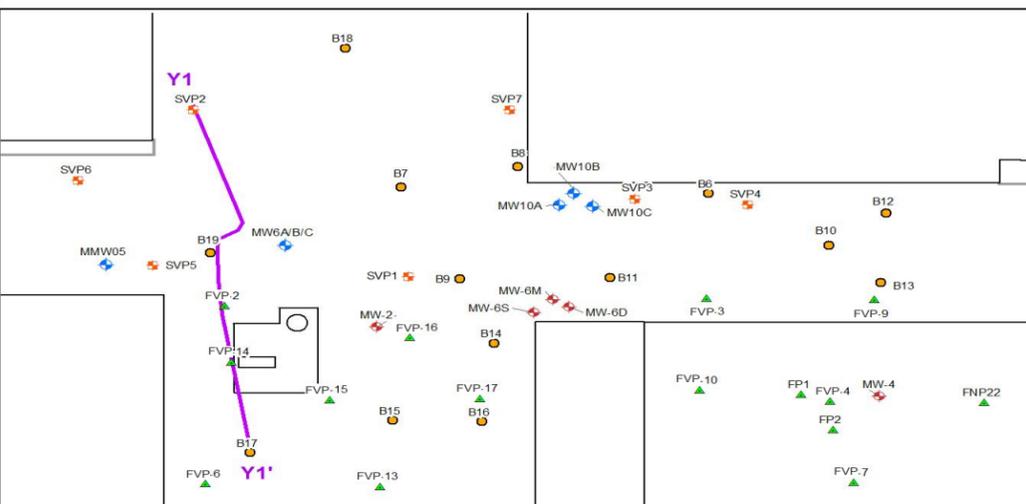
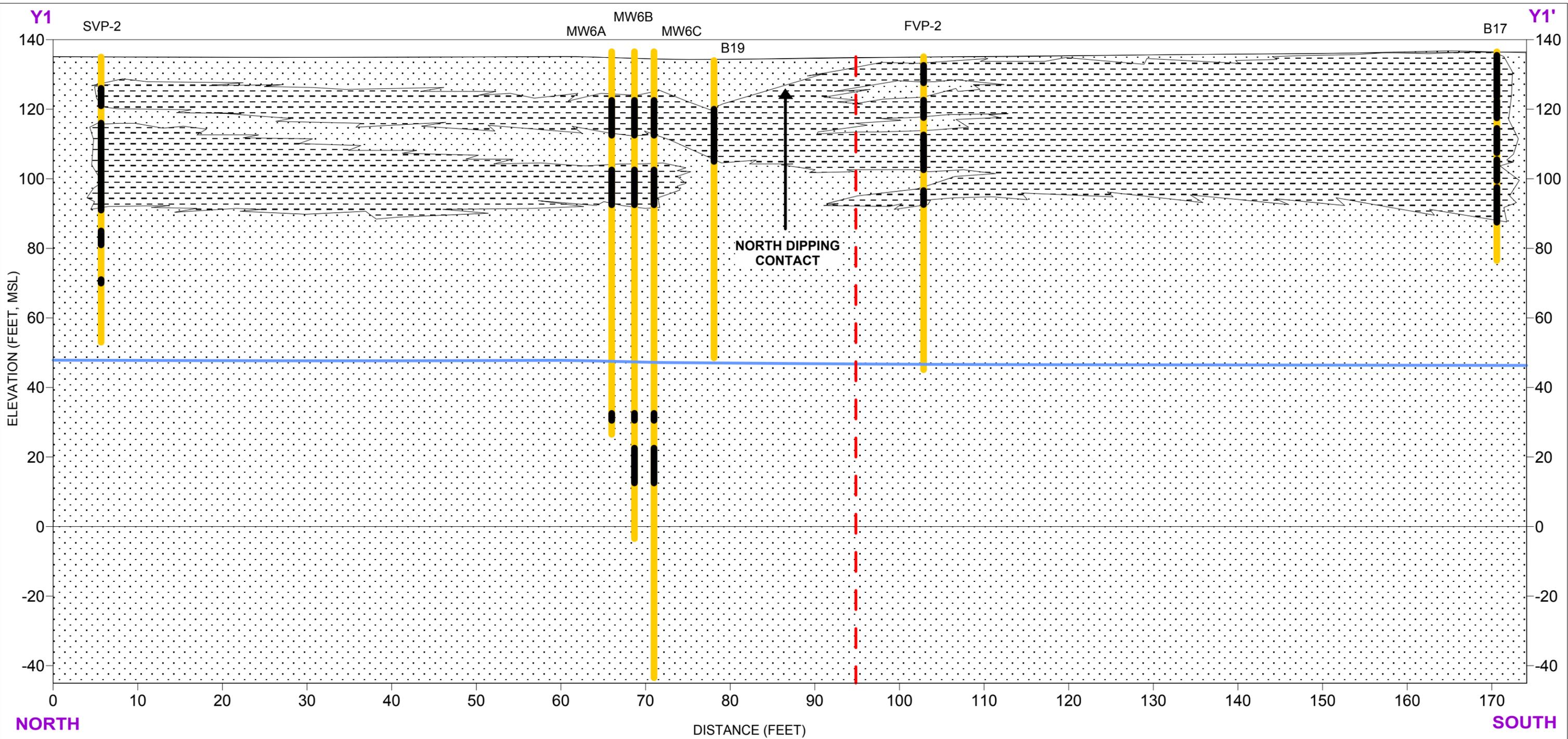
44. Continental Heat Treating violated 26.610 by not maintaining industrial waste pretreatment equipment. There was oil in the clarifier. Facility must pump out the oil and properly maintain the equipment.

No hazardous waste violation(s) observed on date of inspection
 Notice to Comply: The violation(s) must be corrected by 6-8-12
 Return attached "Certificate of Compliance"
 Attention: The item(s) checked is (are) in violation. All violations must be corrected. A re-inspection may occur at any time to verify compliance. Non-compliance could result in re-inspection fees, permit revocation, and/or administrative/civil/criminal penalties. Any time granted for correction of the violation(s) does not preclude any enforcement action by this Department or other agencies. The giving of this notice and recent inspection of your facility is not a representation by the City of Santa Fe Springs that no other violations exist on your premises.

Received by Charlie Sotelo Print name Charlie Sotelo Date 5/8/12

APPENDIX Z

JANUARY 2014 NEWFIELDS FIGURES 5.1.1-5.1.2



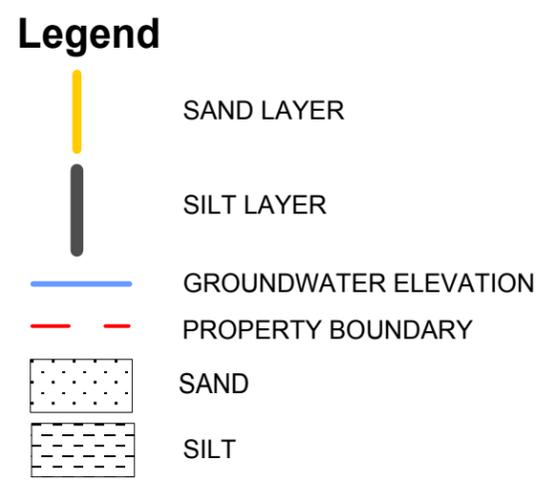
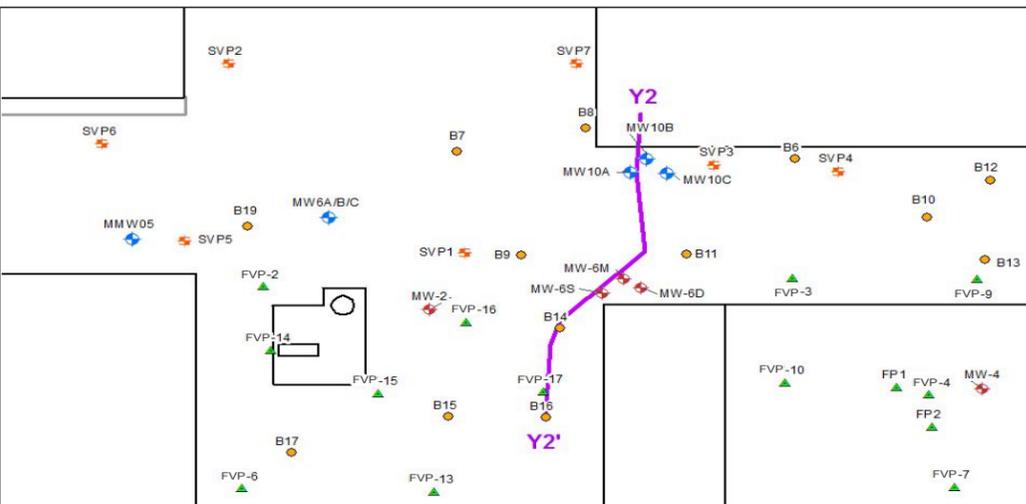
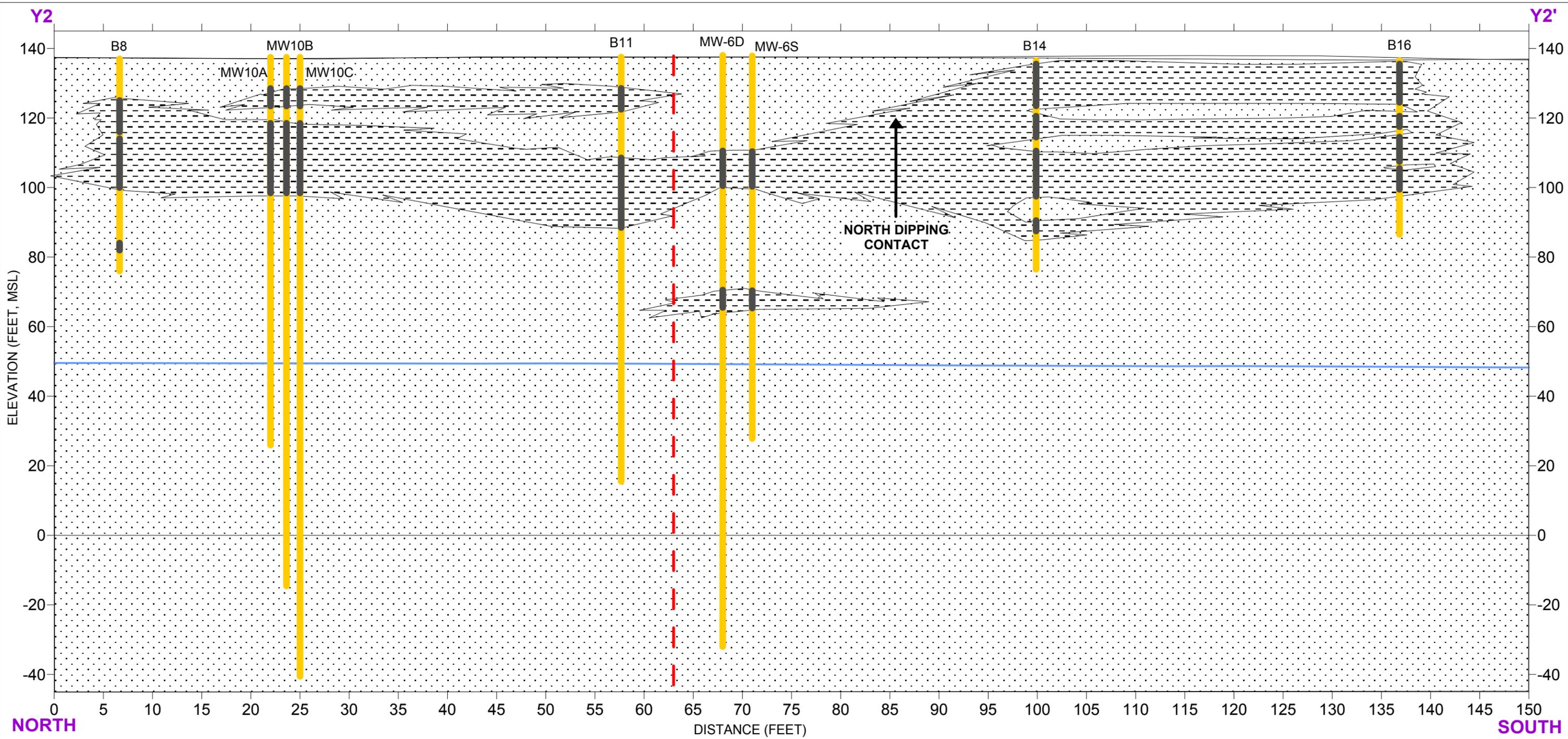
Notes:

1. All locations and dimensions are approximate.
2. Well diameters are not drawn to scale.
3. MSL - Mean Sea Level.
4. Groundwater elevations were take in November 2012.
5. MW6A, MW6B, and MW6C share the same location and are separated to show detail.

NewFields 600 Jefferson St., Suite 1040
Houston, Texas 77002
(713) 357-5244

FIGURE 5.1.1
Y1 - Y1'
CROSS SECTION
(NORTH - SOUTH)

Former ExxonMobil, Jalk Fee Property
10607 Norwalk Boulevard,
Santa Fe Springs, CA



- Notes:
1. All locations and dimensions are approximate.
 2. Well diameters are not drawn to scale.
 3. MSL - Mean Sea Level.
 4. Groundwater elevations were take in November 2012.
 5. MW-6S and MW-6D share the same location and are separated to show detail.
 6. MW10A, MW10B, and MW10C share the same location and are separated to show detail.

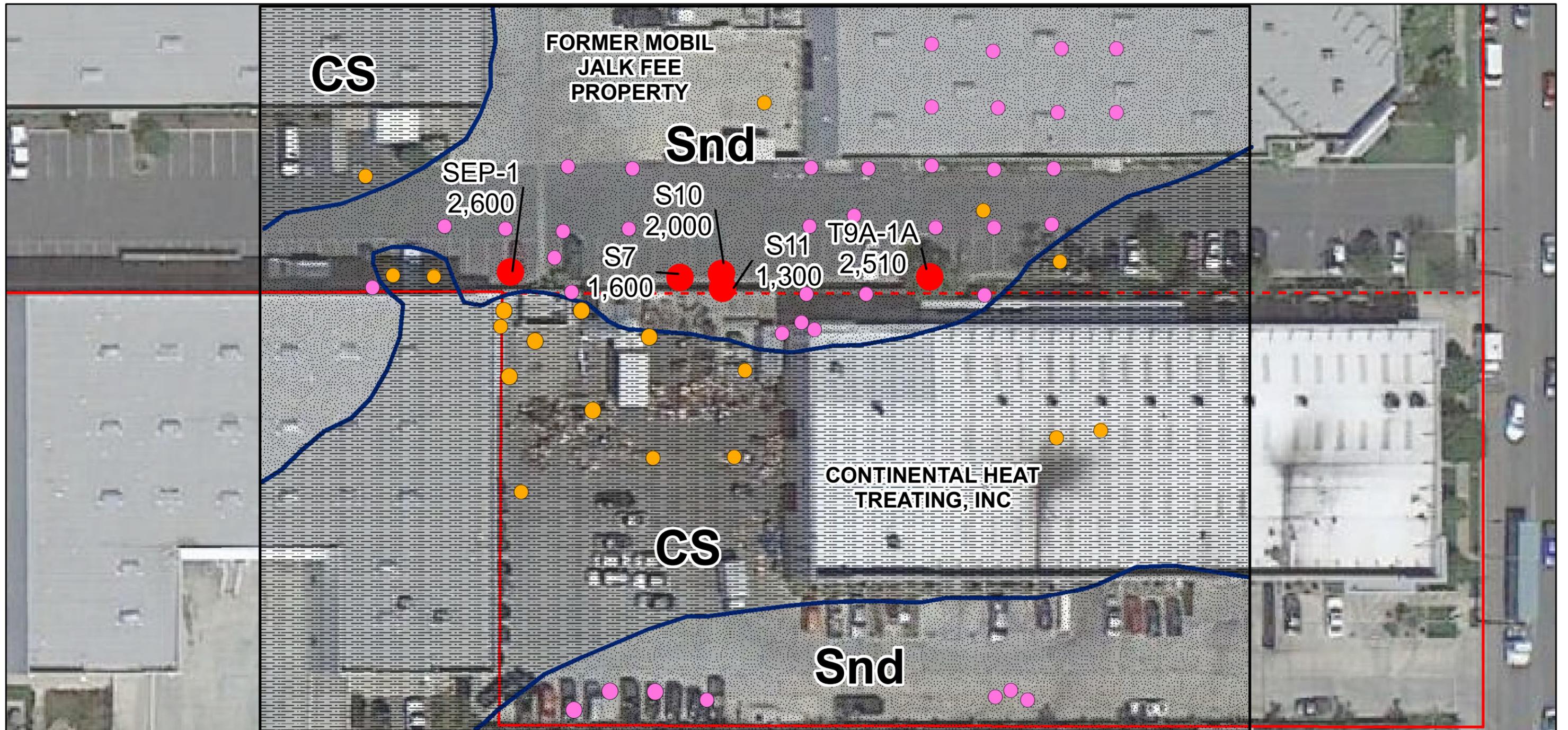
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Houston, Texas 77002
(713) 357-5244

FIGURE 5.1.2
Y2 - Y2'
CROSS SECTION
(NORTH - SOUTH)

Former ExxonMobil, Jalk Fee Property
10607 Norwalk Boulevard,
Santa Fe Springs, CA

APPENDIX AA

JANUARY 2014 NEWFIELDS FIGURES 5.2.1-5.2.3

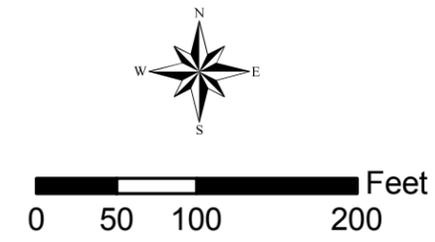


Legend

- CONCENTRATION LOCATION
- APPROXIMATE CONTACT
- PROPERTY BOUNDARY
- LITHOLOGY**
- SAND (Snd)
- CLAY/SILT (CS)
- LITHOLOGY TEXTURE**
- SAND (Snd)
- CLAY/SILT (CS)

SOIL CONCENTRATION

- █ > 1,000 PPM
- █ < 1,000 PPM
- █ < 100 PPM
- █ < 10 PPM
- █ < 1 PPM
- █ < 0.1 PPM
- █ < 0.01 PPM
- █ ND

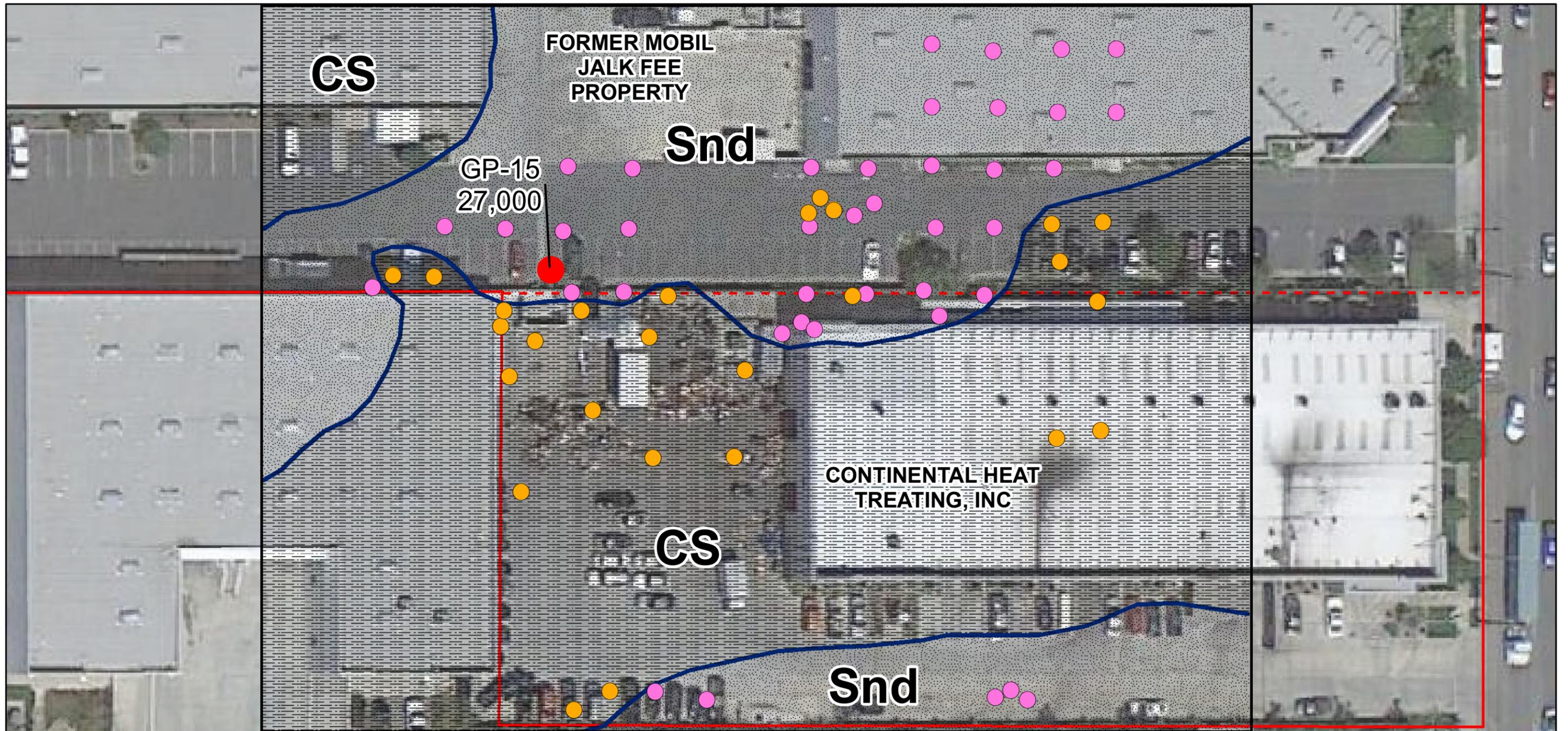


- Notes:
1. All locations and dimensions are approximate.
 2. Snd - Sand
 3. CS - Clay/Silt

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FIGURE 5.2.1
DISTRIBUTION OF CLAY/SILTS AND SANDS
6 FEET DEPTH

Former ExxonMobil, Jalk Fee Property
10607 Norwalk Boulevard,
Santa Fe Springs, CA



Legend

- CONCENTRATION LOCATION
- APPROXIMATE CONTACT
- PROPERTY BOUNDARY
- SAND (Snd)
- CLAY/SILT (CS)

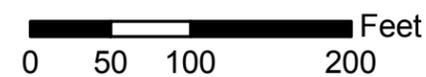
LITHOLOGY TEXTURE

- SAND (Snd)
- CLAY/SILT (CS)

SOIL CONCENTRATION

- █ > 1,000 PPM
- █ < 1,000 PPM
- █ < 100 PPM
- █ < 10 PPM
- █ < 1 PPM
- █ < 0.1 PPM
- █ < 0.01 PPM
- █ ND

[1,000] PPM CONCENTRATION OF TOTAL CHC



Notes:

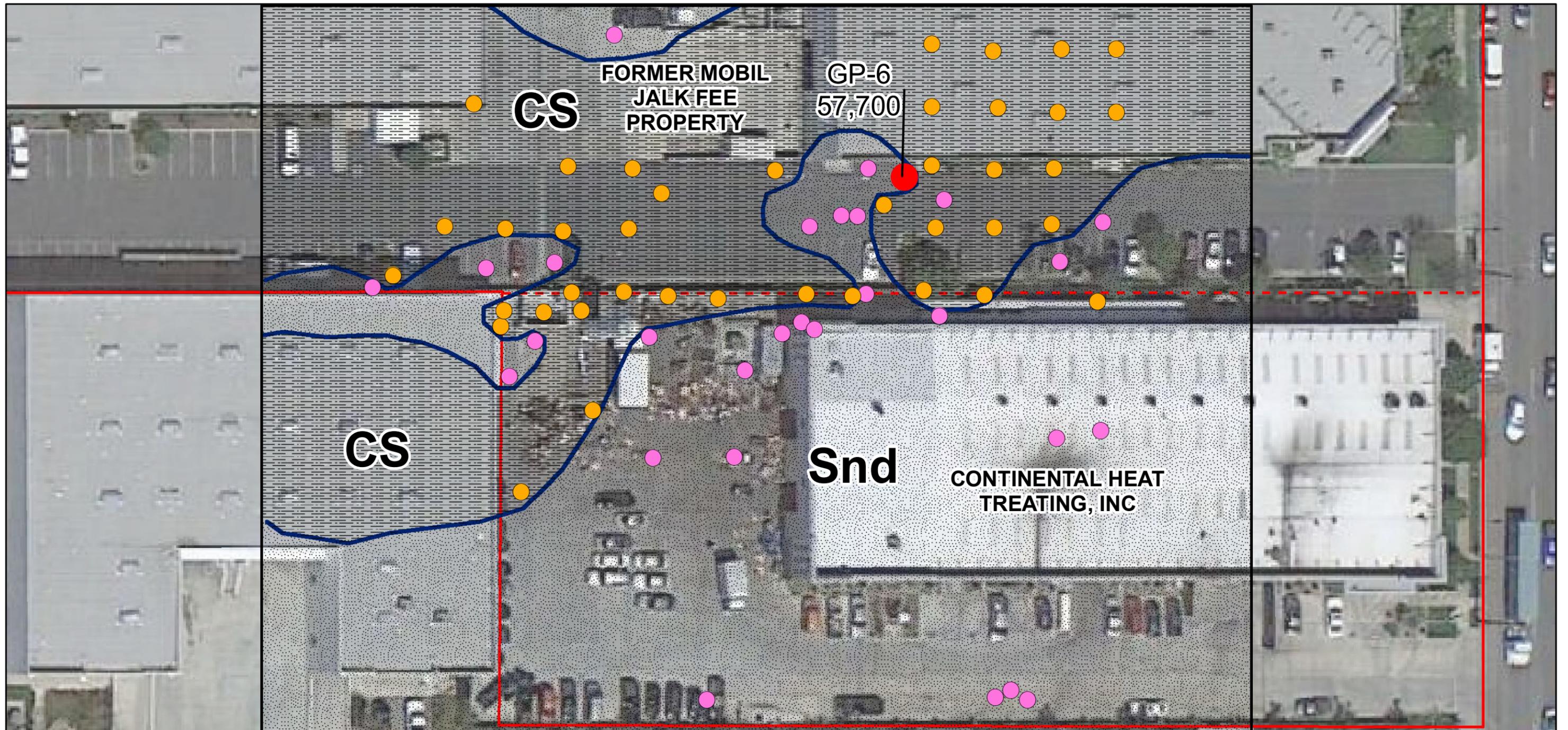
1. All locations and dimensions are approximate.
2. Snd - Sand
3. CS - Clay/Silt



600 Jefferson St., Suite 1040
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FIGURE 5.2.2
DISTRIBUTION OF CLAY/SILTS AND SANDS
10 FEET DEPTH

Former ExxonMobil, Jalk Fee Property
10607 Norwalk Boulevard,
Santa Fe Springs, CA



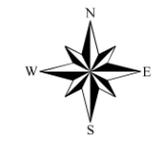
Legend

- CONCENTRATION LOCATION
- APPROXIMATE CONTACT
- PROPERTY BOUNDARY
- SAND (Snd)
- CLAY/SILT (CS)
- SAND (Snd)
- CLAY/SILT (CS)

SOIL CONCENTRATION

- █ > 1,000 PPM
- █ < 1,000 PPM
- █ < 100 PPM
- █ < 10 PPM
- █ < 1 PPM
- █ < 0.1 PPM
- █ < 0.01 PPM
- █ ND

[1,000] PPM CONCENTRATION OF TOTAL CHC



- Notes:
1. All locations and dimensions are approximate.
 2. Snd - Sand
 3. CS - Clay/Silt

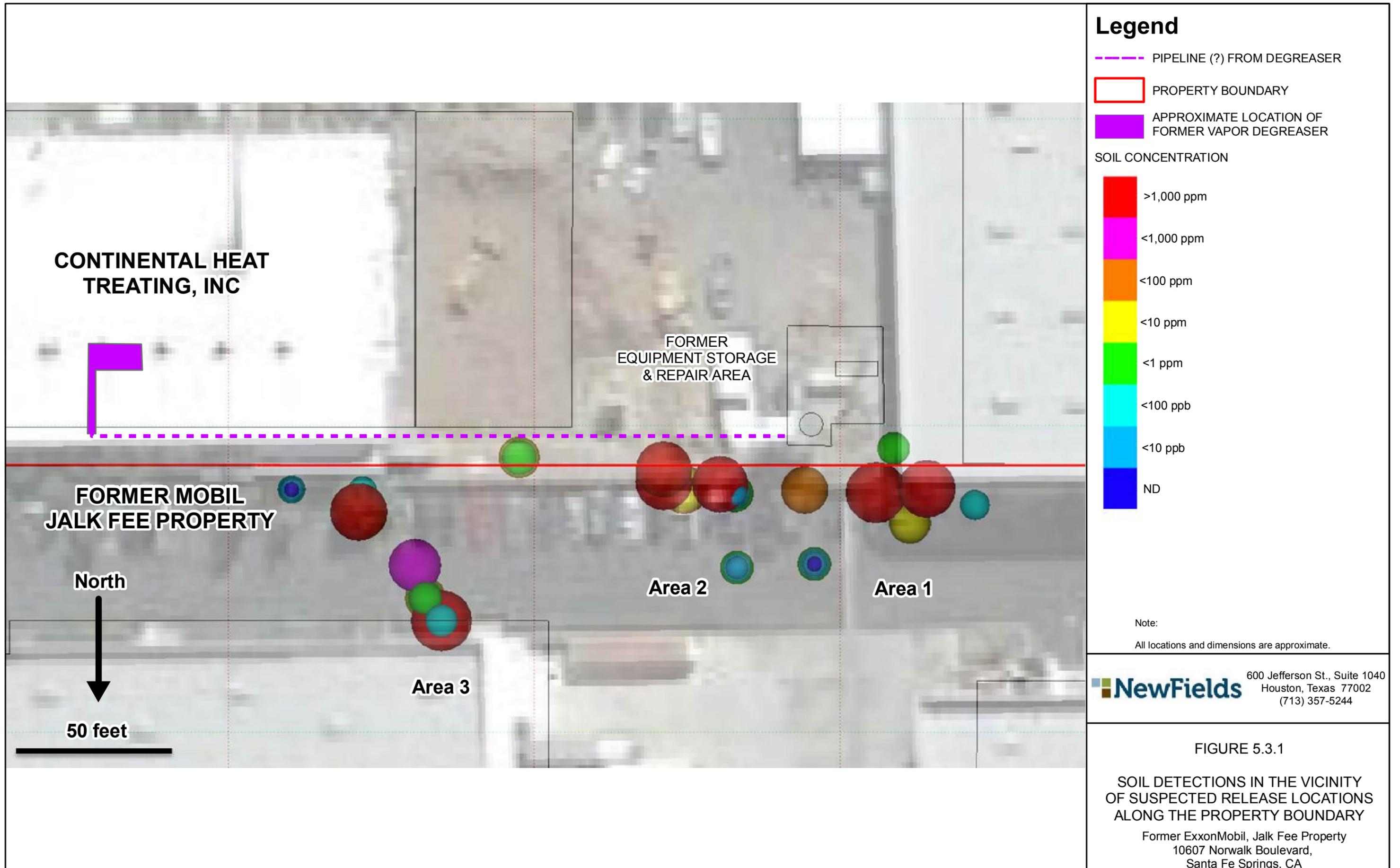
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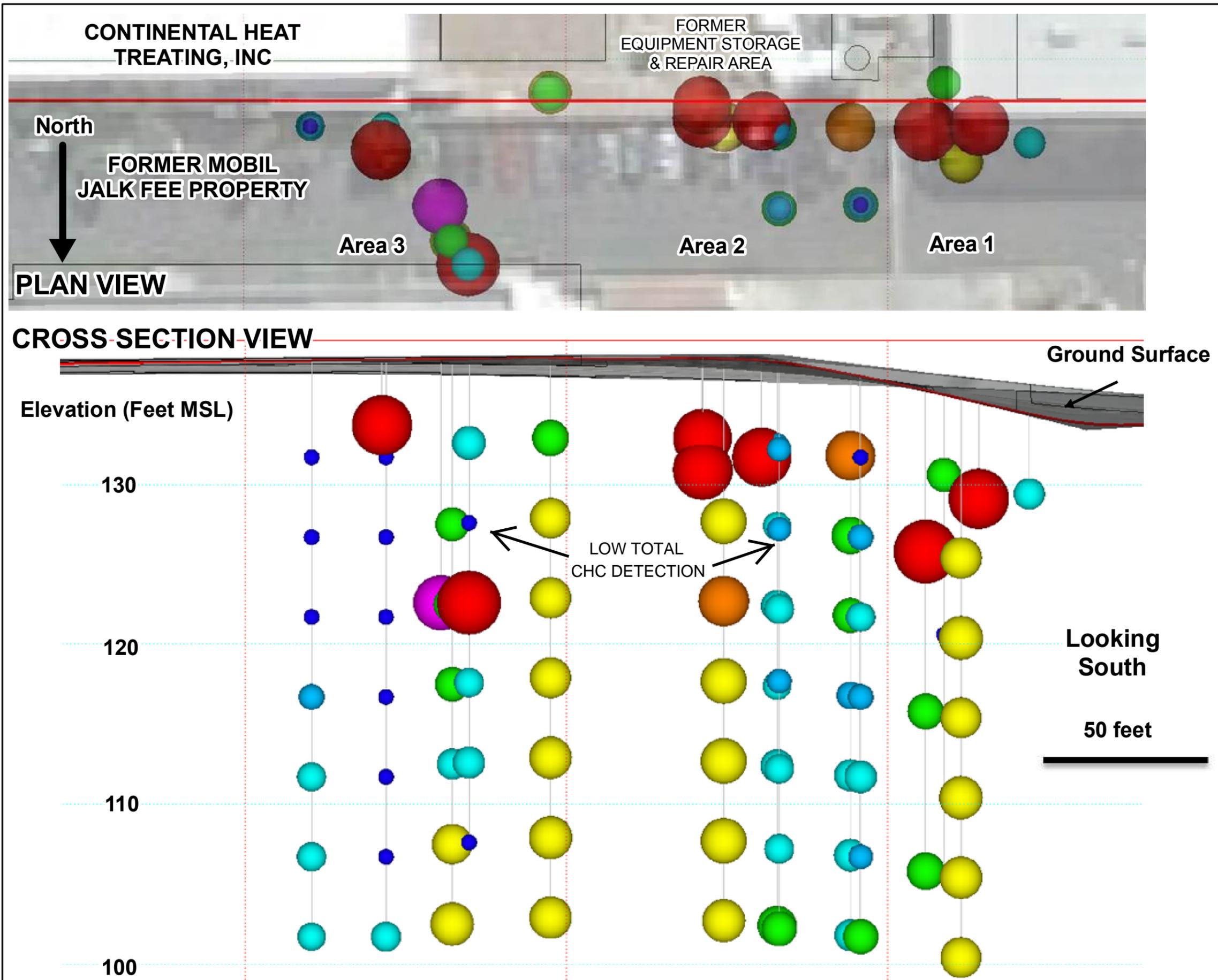
FIGURE 5.2.3
DISTRIBUTION OF CLAY/SILTS AND SANDS
16 FEET DEPTH

Former ExxonMobil, Jalk Fee Property
10607 Norwalk Boulevard,
Santa Fe Springs, CA

APPENDIX AB

JANUARY 2014 NEWFIELDS FIGURES 5.3.1-5.3.2





Legend

PROPERTY BOUNDARY

SOIL CONCENTRATION

- >1,000 ppm
- <1,000 ppm
- <100 ppm
- <10 ppm
- <1 ppm
- <100 ppb
- <10 ppb
- ND

Notes:

- All locations and dimensions are approximate.
- MSL - Mean sea level

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FIGURE 5.3.2
PLAN AND CROSS SECTIONAL VIEW
OF SOIL DETECTIONS IN THE VICINITY
OF SUSPECTED RELEASE LOCATIONS
ALONG THE PROPERTY BOUNDARY

Former ExxonMobil, Jalk Fee Property
 10643 Norwalk Boulevard,
 Santa Fe Springs, CA

APPENDIX AC

CHC CALCULATIONS AND PREVIOUS CONSULTANTS' SOIL DATA

TABLE 1
TOTAL CHLORINATED SOLVENT CONCENTRATION CALCULATION
FORMER EXXONMOBIL JALK FEE PROPERTY
10607 NORWALK BOULEVARD
SANTA FE SPRINGS, CALIFORNIA
Cardno ERI 1155

Sample Number	Depth (feet)	PCE (mg/kg)	TCE (mg/kg)	Cis-1,2-Dichloroethene (mg/kg)	TOTAL CHC (mg/kg)
Samples collected by various consultants.					
EX2-26(A)	6.0	0.68	0.035	NA	0.715
EX2-26	15.0	308	28.1	14.7	350.8
T9A-1A	4	2500	10	7.0	2517
GP-6	5	0.045	0.055	0.23	0.33
GP-6	10	ND	ND	0.021	0.021
GP-6	15	55000	2700	2100	59800

EXPLANATION:

mg/kg = milligrams per kilogram
CHC = chlorinated hydrocarbon concentration
NA = not analyzed
ND = not detected
PCE = tetrachloroethene or perchloroethene
TCE = trichloroethene

Table 1
RESULTS OF LABORATORY ANALYSIS OF SOIL SAMPLES
 June 9 through June 22, 1998
 Mobil Jalk Fee Properties

Boring Number	Sample Date	Depth (ftg)	TRPH (ppm)	sec-	tert-	iso	p-Iso	n-	1,2,4-	1,3,5-	cis-1,2-		trans-1,2-	Ethyl		Methylene		Vinyl	PCE (ppb)	TCE (ppb)		
				Butyl benzene (ppb)	Butyl benzene (ppb)	propyl benzene (ppb)	propyl toluene (ppb)	Naphth alene (ppb)	Propyl benzene (ppb)	Trimethyl benzene (ppb)	Trimethyl benzene (ppb)	o- Xylenes (ppb)	m,p- Xylenes (ppb)	Dichloro ethene (ppb)	Dichloro ethene (ppb)	Toluene (ppb)	benzene (ppb)	Benzene (ppb)			Chloride (ppb)	Chloride (ppb)
EX1-1	6/9/98	5.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	200	ND		
EX1-2	6/9/98	5.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	130	ND		
EX1-3	6/9/98	5.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
EX1-4	6/9/98	6.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	100	ND		
EX1-5	6/10/98	5.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
EX1-6	6/10/98	5.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	240	ND		
EX1-7	6/10/98	11.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
EX1-8	6/10/98	11.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	150	ND		
EX1-9	6/10/98	11.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	54	ND		
EX1-10	6/10/98	11.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	170	ND		
EX1-11	6/11/98	6.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
EX2-1	6/9/98	5.5	73	ND	ND	ND	ND	ND	ND	ND	ND	10	ND	ND	8	ND	ND	ND	ND	15	ND	
EX2-2	6/9/98	5.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
EX2-3	6/9/98	5.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	300	ND		
EX2-4	6/9/98	7.0	120	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	5.2	ND	
EX2-5	6/9/98	5.5	730	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	ND	
EX2-6	6/9/98	9.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	ND	
EX2-7	6/9/98	6.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
EX2-8	6/9/98	6.0	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	ND	
EX2-9	6/9/98	6.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
EX2-10	6/9/98	15.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	7	ND	ND	ND	ND	ND	ND	ND	ND	ND	
→ EX2-11	6/9/98	15.0	25000	8	ND	10	24	ND	ND	ND	ND	16	20	ND	12	13	13	23	ND	ND	ND	ND
EX2-12	6/10/98	15.0	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	ND	
EX2-13	6/10/98	12.5	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	ND	
EX2-14	6/10/98	7.0	ND	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	170	ND	ND	

Table 1

RESULTS OF LABORATORY ANALYSIS OF SOIL SAMPLES

June 9 through June 22, 1998

Mobil Jalk Fee Properties

Boring Number	Sample Date	Depth (ftg)	TRPH (ppm)	sec-	tert-	Iso	p-Iso	Naphth alene	n-	1,2,4-	1,3,5-	o-	m,p-	cis-1,2-	trans-1,2-	Toluene (ppb)	Ethyl	Methylene Chloride (ppb)	Vinyl Chloride (ppb)	PCE (ppb)	TCE (ppb)	
				Butyl benzene (ppb)	Butyl benzene (ppb)	propyl benzene (ppb)	propyl toluene (ppb)		benzene (ppb)	benzene (ppb)	benzene (ppb)			benzene (ppb)	benzene (ppb)		benzene (ppb)		benzene (ppb)			benzene (ppb)
EX2-15	6/10/98	5.5	ND	--	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	430	17
EX2-16	6/10/98	5.5	ND	--	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	270	20
EX2-17	6/10/98	5.5	ND	--	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	350	23
EX2-18	6/10/98	11.5	ND	--	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	290	6.6
EX2-19	6/11/98	11.0	3600	--	--	--	--	--	--	--	--	--	--	59	--	--	--	ND	7.8	33000	10000	
EX2-20	6/11/98	6.0	5900	--	--	--	--	--	--	--	--	--	--	26	--	--	--	ND	ND	300	270	
EX2-21	6/11/98	6.0	ND	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	100	18	
EX2-22	6/11/98	11.0	ND	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	44	11	
EX2-23	6/11/98	6.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
EX2-23	6/11/98	6.5	20	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	6.2	10	
EX2-24	6/11/98	6.5	ND	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	9.6	ND	
EX2-25	6/11/98	6.5	1100	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	140	28	
EX2-26	6/11/98	6.0	21	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	680	35	
EX2-26	6/22/98	15.0	--	2300	ND	1100	ND	ND	1600	200	ND	ND	500	14700	ND	ND	ND	300	ND	ND	308000	28100
EX3-1	6/9/98	5.5	ND	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	
EX3-2	6/9/98	6.0	ND	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	
EX3-3	6/9/98	5.5	280	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	
EX3-4	6/9/98	5.5	ND	--	--	--	--	--	--	--	--	--	--	ND	--	--	--	ND	ND	ND	ND	
EX3-5	6/9/98	6.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
EX3-6	6/9/98	6.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
EX3-7	6/9/98	6.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
EX3-8	6/9/98	6.5	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
EX3-9	6/9/98	6.5	85	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
EX3-10	6/9/98	6.5	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
EX3-11	6/9/98	7.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	

Table 1
RESULTS OF LABORATORY ANALYSIS OF SOIL SAMPLES
 June 9 through June 22, 1998
 Mobil Jalk Fee Properties

Boring Number	Sample Date	Depth (ftg)	TRPH (ppm)	sec-	tert-	Iso	p-Iso		n-	1,2,4-	1,3,5-		cis-1,2-	trans-1,2-		Ethyl		Methylene	Vinyl	PCE (ppb)	TCE (ppb)
				Butyl benzene (ppb)	Butyl benzene (ppb)	propyl benzene (ppb)	propyl toluene (ppb)	Naphth alene (ppb)	Propyl benzene (ppb)	Trimethyl benzene (ppb)	Triethyl benzene (ppb)	o- Xylenes (ppb)	m,p- Xylenes (ppb)	Dichloro ethene (ppb)	Dichloro ethene (ppb)	Toluene (ppb)	benzene (ppb)	Benzenes (ppb)	Chloride (ppb)		
EX3-12	6/9/98	7.5	130	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-13	6/9/98	7.0	8000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-14	6/10/98	10.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-15	6/10/98	10.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-16	6/10/98	10.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-17	6/10/98	10.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-18	6/10/98	10.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-19	6/10/98	11.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-20	6/10/98	12.0	200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-21	6/10/98	12.0	16	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-22	6/10/98	7.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-23	6/10/98	7.0	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-24	6/10/98	6.5	5600	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-25	6/10/98	11.5	21	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-26	6/10/98	11.5	650	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-27	6/10/98	12.5	ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-28	6/10/98	6.5	950	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-29	6/11/98	6.0	3600	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-30	6/11/98	6.0	2200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-31	6/11/98	6.0	2300	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-32	6/11/98	10.0	2400	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-33	6/11/98	7.0	190	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-34	6/11/98	14.0	4400	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
EX3-35	6/11/98	14.0	19	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Table 1

RESULTS OF LABORATORY ANALYSIS OF SOIL SAMPLES

June 9 through June 22, 1998

Mobil Jalk Fee Properties

Boring Number	Sample Date	Depth (ftg)	TRPH (ppm)	sec-	tert-	Iso	p-Iso	n-	1,2,4-	1,3,5-	cis-1,2-		trans-1,2-		Toluene (ppb)	Ethyl	Methylene		Vinyl	PCE (ppb)	TCE (ppb)
				Butyl (ppb)	Butyl (ppb)	propyl (ppb)	propyl (ppb)	Naphth alene (ppb)	Propyl benzene (ppb)	Trimethyl benzene (ppb)	Trimethyl benzene (ppb)	o- Xylenes (ppb)	m,p- Xylenes (ppb)	Dichloro ethene (ppb)		Dichloro ethene (ppb)	benzene (ppb)	benzene (ppb)	Chloride (ppb)		

- Notes:
- TRPH = total petroleum hydrocarbons with gasoline distinction
 - PCE = tetrachloroethene
 - TCE = trichloroethene
 - ftg = feet below grade
 - ppm = parts per million
 - ppb = parts per billion
 - ND = not detected; see official laboratory reports for detection limits
 - = not analyzed, measured, or collected

Table 1

Previous Soil Sample Analytical Results (Levine-Fricke, 1991a)
Mobil Exploration and Producing U.S., Jalk Fee Property

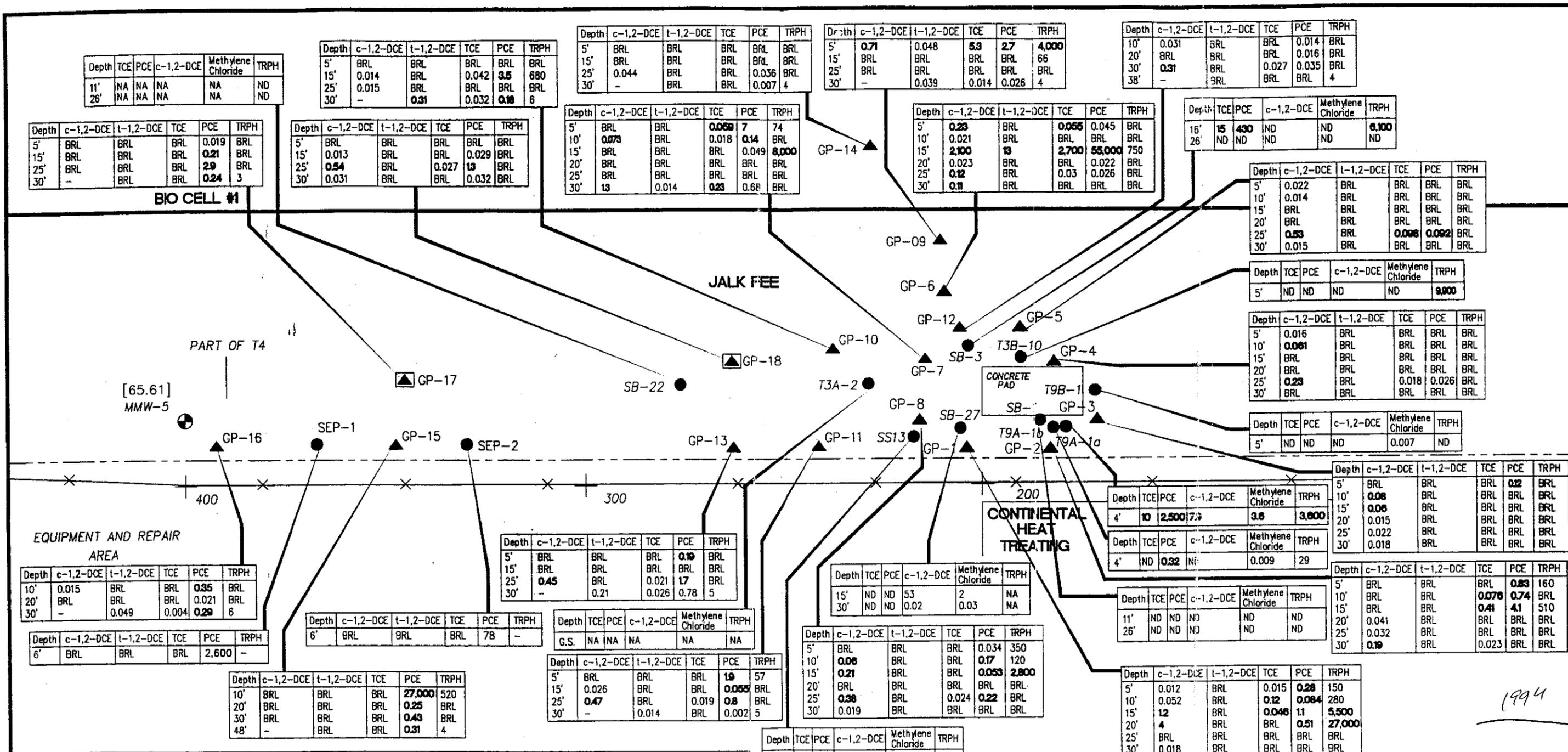
Volatile Organic Compounds (VOCs) and
Total Recoverable Petroleum Hydrocarbons (TRPH)

Page 1 of 1

Sample Location	Sample Depth (ft)	EPA Method 8260 (ppm)				EPA Method TRPH
		TCE	PCE	cis-1,2-DCE	Methylene Chloride	
T3A-2	Surface Grab Sample	NA	NA			
T3B-10	5	ND	ND			
T9A-1A	4	10	2500			
T9A-1B	4	ND	0.32			
T9B-1	5	ND	ND			
SB-1	11	ND	ND			
SB-1	26	ND	ND			
SB-3	16	15	430			
SB-3	26	ND	ND			
SB-22	11	NA	NA			
SB-22	26	NA	NA	NA	NA	ND
SB-27	15	ND	ND	53	2*	NA
SB-27	30	ND	ND	0.02	0.03	NA
SS-13	4	ND	1.3	ND	ND	140

Historic chlorinated concentrations

TCE = Trichloroethene
PCE = Tetrachloroethene
cis-1,2-DCE = cis-1,2-Dichloroethene
ND = None Detected
NA = Not Analyzed
* = also identified in laboratory blank samples
Source: Table 2 and Table 3, Levine-Fricke 1991a



Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
11'	NA	NA	NA	NA	ND
26'	NA	NA	NA	NA	ND

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	BRL	BRL
15'	0.014	BRL	0.042	3.5	680
25'	0.015	BRL	BRL	BRL	BRL
30'	-	0.31	0.032	0.10	6

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	BRL	BRL
15'	BRL	BRL	BRL	BRL	BRL
25'	0.044	BRL	BRL	0.036	BRL
30'	-	BRL	BRL	0.007	4

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	0.71	0.048	5.3	2.7	4,000
15'	BRL	BRL	BRL	BRL	66
25'	BRL	BRL	BRL	BRL	BRL
30'	-	0.039	0.014	0.026	4

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
10'	0.031	BRL	BRL	0.014	BRL
20'	BRL	BRL	BRL	0.016	BRL
30'	0.31	BRL	0.027	0.035	BRL
38'	-	BRL	BRL	BRL	4

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	0.019	BRL
15'	BRL	BRL	BRL	0.21	BRL
25'	BRL	BRL	BRL	2.9	BRL
30'	-	BRL	BRL	0.24	3

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	BRL	BRL
15'	0.013	BRL	BRL	0.029	BRL
25'	0.54	BRL	0.027	13	BRL
30'	0.031	BRL	BRL	0.032	BRL

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	0.069	7	74
10'	0.073	BRL	0.018	0.14	BRL
15'	BRL	BRL	BRL	0.049	8,000
20'	BRL	BRL	BRL	BRL	BRL
25'	BRL	BRL	BRL	BRL	BRL
30'	13	0.014	0.23	0.60	BRL

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	0.23	BRL	BRL	0.055	BRL
10'	0.021	BRL	BRL	BRL	BRL
15'	2.100	13	2,700	55,000	750
20'	0.023	BRL	BRL	0.022	BRL
25'	0.12	BRL	BRL	0.03	BRL
30'	0.11	BRL	BRL	BRL	BRL

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
16'	15	430	ND	ND	8,100
26'	ND	ND	ND	ND	ND

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	0.022	BRL	BRL	BRL	BRL
10'	0.014	BRL	BRL	BRL	BRL
15'	BRL	BRL	BRL	BRL	BRL
20'	BRL	BRL	BRL	BRL	BRL
25'	0.53	BRL	0.008	0.092	BRL
30'	0.015	BRL	BRL	BRL	BRL

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
5'	ND	ND	ND	ND	9,900

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	0.016	BRL	BRL	BRL	BRL
10'	0.061	BRL	BRL	BRL	BRL
15'	BRL	BRL	BRL	BRL	BRL
20'	BRL	BRL	BRL	BRL	BRL
25'	0.23	BRL	0.018	0.026	BRL
30'	BRL	BRL	BRL	BRL	BRL

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
5'	ND	ND	ND	0.007	ND

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
4'	10	2,500	7.3	3.6	3,600

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
4'	ND	0.32	ND	0.009	29

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	0.32	BRL
10'	0.06	BRL	BRL	BRL	BRL
15'	0.06	BRL	BRL	BRL	BRL
20'	0.015	BRL	BRL	BRL	BRL
25'	0.022	BRL	BRL	BRL	BRL
30'	0.018	BRL	BRL	BRL	BRL

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	0.83	160
10'	BRL	BRL	BRL	0.075	0.74
15'	BRL	BRL	BRL	0.41	4.1
20'	0.041	BRL	BRL	BRL	BRL
25'	0.032	BRL	BRL	BRL	BRL
30'	0.19	BRL	0.023	BRL	BRL

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
10'	0.015	BRL	BRL	0.35	BRL
20'	BRL	BRL	BRL	0.021	BRL
30'	-	0.049	0.004	0.29	6

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	0.19	BRL
15'	BRL	BRL	BRL	0.021	1.7
25'	0.45	BRL	0.026	0.78	5
30'	-	0.21	0.026	0.78	5

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
6'	BRL	BRL	BRL	2,600	-

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
6'	BRL	BRL	BRL	78	-

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
G.S.	NA	NA	NA	NA	NA

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	1.9	57
15'	0.026	BRL	BRL	0.055	BRL
25'	0.47	BRL	0.019	0.8	BRL
30'	-	0.014	BRL	0.002	5

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
15'	ND	ND	53	2	NA
30'	ND	ND	0.02	0.03	NA

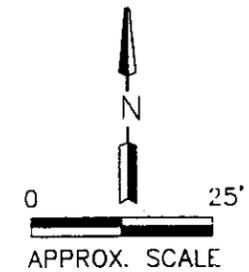
Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	BRL	BRL	BRL	0.034	350
10'	0.06	BRL	BRL	0.17	120
15'	0.21	BRL	BRL	0.053	2,800
20'	BRL	BRL	BRL	BRL	BRL
25'	0.38	BRL	0.024	0.22	BRL
30'	0.019	BRL	BRL	BRL	BRL

Depth	c-1,2-DCE	t-1,2-DCE	TCE	PCE	TRPH
5'	0.012	BRL	0.015	0.28	150
10'	0.052	BRL	0.12	0.084	280
15'	12	BRL	0.048	11	5,500
20'	4	BRL	BRL	0.51	27,000
25'	BRL	BRL	BRL	BRL	BRL
30'	0.018	BRL	BRL	BRL	BRL

Depth	TCE	PCE	c-1,2-DCE	Methylene Chloride	TRPH
4'	ND	1.3	ND	ND	140

LEGEND

- PROPERTY LINE
 - T4 --- APPROXIMATE LOCATION OF EXPLORATORY TEST PIT
 - SB-22 ● SOIL BORING (Levine-Fricke, December 1991)
 - MMW-5 ⊕ GROUNDWATER MONITOR WELL LOCATION
 - [65.61] DEPTH TO GROUNDWATER IN FEET
 - 500+ SURVEYED MEASURED INTERVALS (100 FOOT)
 - CHAIN LINK FENCE
 - GP-17 ▲ CONTINGENT GEOPROBE (McLaren/Hart, July-September 1994)
 - GP-14 ▲ GEOPROBE (McLaren/Hart, July-September 1994)
- c-1,2-DCE cis 1,2-Dichloroethene
t-1,2-DCE trans 1,2-Dichloroethene
TCE Trichloroethene
PCE Tetrachloroethene
TRPH Total Recoverable Petroleum Hydrocarbons
- Not Analyzed for this Compound
BRL Below Reporting Limit
ND Not Detected
NA Not Analyzed
0.38 Concentration above 10xMCL for for HVOC's or above 1,000 ppm for TRPH
- [65.61] DEPTH TO GROUND WATER IN FEET
Note: All Concentrations are Reported in parts per million (ppm).



NOTE: SITE MAP MODIFIED FROM LEVINE-FRICKE (1991b).

McLaren Hart
16755 VON KARMAN AVENUE, IRVINE, CA 92714
TEL (714) 756-2667 FAX (714) 756-8460

FIGURE 2
GEOPROBE LOCATIONS
MOBIL-JALK FEE LEASE
10607 NORWALK BOULEVARD
SANTA FE SPRINGS, CA

DRAWN BY: E. Muresan	DATE: 9-26-94	PROJECT NAME: MOBIL JALK FEE PCE
CHECKED BY: E. Ferguson	DATE: 10-26-94	PROJECT NUMBER: 03.0601382.000
APPROVED BY: T. Bubier	DATE: 10-26-94	REVISION DATE: 10-26-94
		DRAWING FILE # C9410003

1994

Table 2

**Soil Sample Analytical Results
Mobil Exploration and Producing, U.S., Jalk Fee Property**

**Halogenated Volatile Organic Compounds (HVOCs) and
Total Recoverable Petroleum Hydrocarbon (TRPH)**

GeoProbe ID	Depth (ft)	EPA Method 8010 (ppm)				EPA Method 418.1 (ppm)
		cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	TRPH
GP-1	5	0.012	BRL	0.015	0.28	150
	10	0.052	BRL	0.12	0.084	280
	15	1.2	BRL	0.046	1.1	5500
	20	4	BRL	BRL	0.51	27000
	25	BRL	BRL	BRL	BRL	BRL
	30	0.018	BRL	BRL	BRL	BRL
GP-2	5	BRL	BRL	BRL	0.83	160
	10	BRL	BRL	0.076	0.74	BRL
	15	BRL	BRL	0.41	4.1	510
	20	0.041	BRL	BRL	BRL	BRL
	25	0.032	BRL	BRL	BRL	BRL
	30	0.19	BRL	0.023	BRL	BRL
GP-3	5	BRL	BRL	BRL	0.12	BRL
	10	0.08	BRL	BRL	BRL	BRL
	15	0.06	BRL	BRL	BRL	BRL
	20	0.015	BRL	BRL	BRL	BRL
	25	0.022	BRL	BRL	BRL	BRL
	30	0.018	BRL	BRL	BRL	BRL
GP-4	5	0.016	BRL	BRL	BRL	BRL
	10	0.061	BRL	BRL	BRL	BRL
	15	BRL	BRL	BRL	BRL	BRL
	20	BRL	BRL	BRL	BRL	BRL
	25	0.23	BRL	0.018	0.026	BRL
	30	BRL	BRL	BRL	BRL	BRL

Table 2

**Soil Sample Analytical Results
Mobil Exploration and Producing, U.S., Jalk Fee Property**

**Halogenated Volatile Organic Compounds (HVOCs) and
Total Recoverable Petroleum Hydrocarbon (TRPH)**

GeoProbe ID	Depth (ft)	EPA Method 8010 (ppm)				EPA Method 418.1 (ppm)
		cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	TRPH
GP-5	5	0.022	BRL	BRL	BRL	BRL
	10	0.014	BRL	BRL	BRL	BRL
	15	BRL	BRL	BRL	BRL	BRL
	20	BRL	BRL	BRL	BRL	BRL
	25	0.53	BRL	0.098	0.092	BRL
	30	0.015	BRL	BRL	BRL	BRL
GP-6	5	0.23	BRL	0.055	0.045	BRL
	10	0.021	BRL	BRL	BRL	BRL
	15	2100	13	2700	55000	750
	20	0.023	BRL	BRL	0.022	BRL
	25	0.12	BRL	0.03	0.026	BRL
	30	0.11	BRL	BRL	BRL	BRL
GP-7	5	BRL	BRL	0.059	7	74
	10	0.073	BRL	0.018	0.14	BRL
	15	BRL	BRL	BRL	0.049	8000
	20	BRL	BRL	BRL	BRL	BRL
	25	BRL	BRL	BRL	BRL	BRL
	30	1.3	0.014	0.23	0.68	BRL
GP-8	5	BRL	BRL	BRL	0.034	350
	10	0.06	BRL	BRL	0.17	120
	15	0.21	BRL	BRL	0.053	2800
	20	BRL	BRL	BRL	BRL	BRL
	25	0.38	BRL	0.024	0.22	BRL
	30	0.019	BRL	BRL	BRL	BRL

Table 2

**Soil Sample Analytical Results
Mobil Exploration and Producing, U.S., Jalk Fee Property**

**Halogenated Volatile Organic Compounds (HVOCs) and
Total Recoverable Petroleum Hydrocarbon (TRPH)**

GeoProbe ID	Depth (ft)	EPA Method 8010 (ppm)				EPA Method 418.1 (ppm)
		cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	TRPH
GP-9	5	0.71	0.048	5.3	2.7	4000
	15	BRL	BRL	BRL	BRL	66
	25	BRL	BRL	BRL	BRL	BRL
	30	NA	0.039	0.014	0.026	4
GP-10	5	BRL	BRL	BRL	BRL	BRL
	15	0.014	BRL	0.042	3.5	680
	25	0.015	BRL	BRL	BRL	BRL
	30	NA	0.31	0.032	0.18	6
GP-11	5	BRL	BRL	BRL	1.9	57
	15	0.026	BRL	BRL	0.055	BRL
	25	0.47	BRL	0.019	0.8	BRL
	30	NA	0.014	BRL	0.002	5
GP-12	10	0.031	BRL	BRL	0.014	BRL
	20	BRL	BRL	BRL	0.016	BRL
	30	0.31	BRL	0.027	0.035	BRL
	38	NA	BRL	BRL	BRL	4
GP-13	5	BRL	BRL	BRL	0.19	BRL
	15	BRL	BRL	BRL	BRL	BRL
	25	0.45	BRL	0.021	1.7	BRL
	30	NA	0.21	0.026	0.78	5
GP-14	5	BRL	BRL	BRL	BRL	BRL
	15	BRL	BRL	BRL	BRL	BRL
	25	0.044	BRL	BRL	0.036	BRL
	30	NA	BRL	BRL	0.007	4

Table 2

**Soil Sample Analytical Results
Mobil Exploration and Producing, U.S., Jalk Fee Property**

**Halogenated Volatile Organic Compounds (HVOCs) and
Total Recoverable Petroleum Hydrocarbon (TRPH)**

GeoProbe ID	Depth (ft)	EPA Method 8010 (ppm)				EPA Method 418.1 (ppm)
		cis-1,2-DCE	trans-1,2-DCE	TCE	PCE	TRPH
GP-15	10	BRL	BRL	BRL	27000	520
	20	BRL	BRL	BRL	0.25	BRL
	30	BRL	BRL	BRL	0.43	BRL
	48	NA	BRL	BRL	0.31	4
GP-16	10	0.015	BRL	BRL	0.35	BRL
	20	BRL	BRL	BRL	0.021	BRL
	30	NA	0.049	0.004	0.29	6
GP-17	5	BRL	BRL	BRL	0.019	BRL
	15	BRL	BRL	BRL	0.21	BRL
	25	BRL	BRL	BRL	2.9	BRL
	30	NA	BRL	BRL	0.24	3
GP-18	5	BRL	BRL	BRL	BRL	BRL
	15	0.013	BRL	BRL	0.029	BRL
	25	0.54	BRL	0.027	1.3	BRL
	30	0.031	BRL	BRL	0.032	BRL
SEP-1	6	BRL	BRL	BRL	2600	NA
SEP-2	6	BRL	BRL	BRL	78	NA

cis-1,2-DCE = cis-1,2 Dichloroethene
trans-1,2-DCE = trans-1,2 Dichloroethene
TCE = Trichloroethene
PCE = Tetrachloroethene
BRL = Below Reporting Limit
NA = Not Analyzed

TABLE 1
Hydrocarbon Results of TRC Confirmation Soil Samples
Jalk Fee Property / Santa Fe Springs, California
October and November 2000

SAMPLE NUMBER	DEPTH (fbg) ¹	HYDROCARBON RESULT (mg/kg)		
		C4-C12	C13-C22	C23-C40
EXCAVATION AREA M-1				
JF-M1-S37-EW-8	8.0	ND	ND	ND
JF-M1-S38-B-14	14	334	2,020	3,200
JF-M1-S39-SW-8	8.0	ND	ND	ND
JF-M1-S40-WW-8	8.0	ND	ND	ND
EXCAVATION AREA M-2				
JF-M2-S16-B-10	10	ND	ND	ND
EXCAVATION AREA M-3				
<i>JF-M3-S29-B-16</i>	<i>16</i>	<i>4,958</i>	<i>2,677</i>	<i>1,909</i>
JF-M3-S29B-B-19	19	5,510	4,630	3,796
JF-M3-S33-EW-10	10	ND	2.0	ND
JF-M3-S34-WW-14	14	ND	ND	ND
JF-M3-S35-NW-13	13	ND	ND	ND
JF-M3-S36-SW-13	13	ND	ND	ND
EXCAVATION AREA M-7				
JF-M7-S22-EW-8	8.0	ND	ND	ND
JF-M7-S23-SW-8	8.0	ND	ND	ND
JF-M7-S24-B-13	13	ND	ND	ND
JF-M7-S25-WW-8	8.0	ND	ND	ND
JF-M7-S26-NW-8	8.0	ND	ND	ND
EXCAVATION AREA M-8				
JF-M8-S27-B-13	13	ND	ND	ND
JF-M8-S28-WW-10	10	ND	ND	ND
JF-M8-S30-SW-10	10	ND	364	1,069
JF-M8-S31-EW-10	10	ND	32	265
JF-M8-S32-NW-10	10	52	732	984
EXCAVATION AREA M-9				
JF-M9-S17-WW-5	5.0	ND	76	649
JF-M9-S18-NW-5	5.0	ND	59	334
<i>JF-M9-S19-B-7</i>	<i>7.0</i>	<i>738</i>	<i>2,346</i>	<i>1,709</i>
<i>JF-M9-S19B-B-16</i>	<i>16</i>	<i>3,797</i>	<i>10,949</i>	<i>8,480</i>
JF-M9-S19C-B-24	24	658	1,219	697
JF-M9-S20-SW-5	5.0	ND	42	453
JF-M9-S21-EW-5	5.0	ND	103	326
EXCAVATION AREA SB-49				
JF-SB49-S1-SW-5	5.0	ND	ND	ND
JF-SB49-S2-NW-5	5.0	ND	ND	ND
JF-SB49-S3-B-6	6.0	ND	ND	ND
<i>JF-SB49-S4-B-7</i>	<i>7.0</i>	<i>2,172</i>	<i>2,796</i>	<i>1,685</i>
JF-SB49-S4B-B-13	13	ND	17	39
<i>JF-SB49-S5-SW-5</i>	<i>5.0</i>	<i>45</i>	<i>340</i>	<i>461</i>
JF-SB49-S5B-SW-10	10	803	1,401	812
JF-SB49-S6-NW-5	5.0	ND	ND	ND
<i>JF-SB49-S7-B-6</i>	<i>6.0</i>	<i>2.0</i>	<i>671</i>	<i>815</i>
JF-SB49-S8-SW-5	5.0	ND	2.0	19
<i>JF-SB49-S9-NW-5</i>	<i>5.0</i>	<i>ND</i>	<i>792</i>	<i>1,096</i>
<i>JF-SB49-S10-B-7</i>	<i>7.0</i>	<i>ND</i>	<i>464</i>	<i>1,391</i>
JF-SB49-S11-SW-5	5.0	ND	399	972
<i>JF-SB49-S12-NW-5</i>	<i>5.0</i>	<i>ND</i>	<i>82</i>	<i>230</i>
JF-SB49-S13-B-6	6.0	ND	1.0	12
JF-SB49-S14-SW-5	5.0	ND	1.0	14
JF-SB49-S15-NW-5	5.0	ND	ND	ND

¹ fbg - feet below grade.

Note: Results in blue font italics were excavated.

TABLE 2
VOC Results of TRC Confirmation Soil Samples
Jalk Fee Property / Santa Fe Springs, California
October and November 2000

SAMPLE NUMBER	DEPTH (fbg) ¹	VOCs ² (mg/kg)			
		c-1,2-DCE ³	PCE ⁴	TCE ⁵	Other VOCs ⁶
EXCAVATION AREA M-1					
JF-M1-S37-EW-8	8.0	<0.001	<0.001	<0.001	0.00572
JF-M1-S38-B-14	14	<0.001	0.059	<0.001	6.214
JF-M1-S39-SW-8	8.0	<0.001	0.00099	<0.001	0.0076
JF-M1-S40-WW-8	8.0	<0.001	0.00065	<0.001	0.0091
EXCAVATION AREA M-2					
JF-M2-S16-B-10	10	<0.001	<0.001	<0.001	0.00638
EXCAVATION AREA M-3					
<i>JF-M3-S29-B-16</i>	<i>16</i>	<i><0.001</i>	<i><0.001</i>	<i><0.001</i>	<i>145.56</i>
JF-M3-S33-EW-10	10	<0.001	<0.001	<0.001	0.03347
JF-M3-S34-WW-14	14	<0.001	<0.001	<0.001	0.01271
JF-M3-S35-NW-13	13	<0.001	0.27	<0.001	0.0155
JF-M3-S36-SW-13	13	<0.001	<0.001	<0.001	0.00447
EXCAVATION AREA M-7					
JF-M7-S22-EW-8	8.0	<0.001	0.0031	<0.001	0.0132
JF-M7-S23-SW-8	8.0	<0.001	0.046	<0.001	0.0233
JF-M7-S24-B-13	13	<0.001	0.0054	<0.001	0.08384
JF-M7-S25-WW-8	8.0	<0.001	0.0049	<0.001	0.032
JF-M7-S26-NW-8	8.0	<0.001	0.0041	<0.001	0.00499
EXCAVATION AREA M-8					
JF-M8-S27-B-13	13	<0.001	<0.001	<0.001	ND
JF-M8-S28-WW-10	10	<0.001	<0.001	<0.001	0.2
JF-M8-S30-SW-10	10	<0.001	<0.001	<0.001	0.0094
JF-M8-S31-EW-10	10	<0.001	<0.001	<0.001	0.00708
JF-M8-S32-NW-10	10	<0.001	<0.001	<0.001	0.1501
EXCAVATION AREA M-9					
JF-M9-S17-WW-5	5.0	<0.001	<0.001	<0.001	0.013
JF-M9-S18-NW-5	5.0	<0.001	<0.001	<0.001	0.011
<i>JF-M9-S19-B-7</i>	<i>7.0</i>	<i><0.001</i>	<i><0.001</i>	<i><0.001</i>	<i>5.207</i>
JF-M9-S20-SW-5	5.0	<0.001	<0.001	<0.001	0.0162
JF-M9-S21-EW-5	5.0	<0.001	<0.001	<0.001	0.00848
EXCAVATION AREA SB-49					
JF-SB49-S1-SW-5	5.0	0.023	0.0073	<0.001	0.05177
JF-SB49-S2-NW-5	5.0	0.0012	0.0055	<0.001	0.0112
JF-SB49-S3-B-6	6.0	0.00061	0.0099	<0.001	0.0133
<i>JF-SB49-S4-B-7</i>	<i>7.0</i>	<i>8.8</i>	<i>31</i>	<i>5.9</i>	<i>104.2</i>
JF-SB49-S4B-B-13	13	0.02	1.1	0.0024	ND
<i>JF-SB49-S5-SW-5</i>	<i>5.0</i>	<i>1.4</i>	<i>61</i>	<i>0.71</i>	<i>0.73</i>
JF-SB49-S5B-SW-10	10	2.0	3.0	0.73	35.74
JF-SB49-S6-NW-5	5.0	0.025	0.4	0.0053	0.03535
<i>JF-SB49-S7-B-6</i>	<i>6.0</i>	<i><1.0</i>	<i>1,600</i>	<i><1.0</i>	<i>4.9</i>
JF-SB49-S7B-B-12	12	0.0065	9.8	0.0065	0.0152
JF-SB49-S8-SW-5	5.0	0.0014	3.2	0.0016	0.0153
<i>JF-SB49-S9-NW-5</i>	<i>5.0</i>	<i>0.033</i>	<i>250</i>	<i>0.089</i>	<i>0.53786</i>
JF-SB49-S9B-NW-6	6.0	<0.001	0.14	<0.001	0.0071
<i>JF-SB49-S10-B-7</i>	<i>7.0</i>	<i>0.0014</i>	<i>2,000</i>	<i>0.14</i>	<i>0.7609</i>
JF-SB49-S10B-B-8	8.0	<0.001	2.5	0.0089	0.0229
JF-SB49-S11-SW-5	5.0	<0.001	1,300	0.01	0.52733
<i>JF-SB49-S12-NW-5</i>	<i>5.0</i>	<i>0.00055</i>	<i>440</i>	<i>0.13</i>	<i>0.34907</i>
JF-SB49-S12B-NW-6	6.0	<0.001	1.7	<0.001	0.00883
JF-SB49-S13-B-6	6.0	<0.001	1.4	<0.001	0.17185
JF-SB49-S14-SW-5	5.0	<0.001	1.1	<0.001	0.23029
JF-SB49-S15-NW-5	5.0	<0.001	0.15	<0.001	0.0815

¹ fbg - feet below grade.

² VOCs - volatile organic compounds.

³ c-1,2-DCE - cis-1,2-dichloroethene.

⁴ PCE - tetrachloroethene.

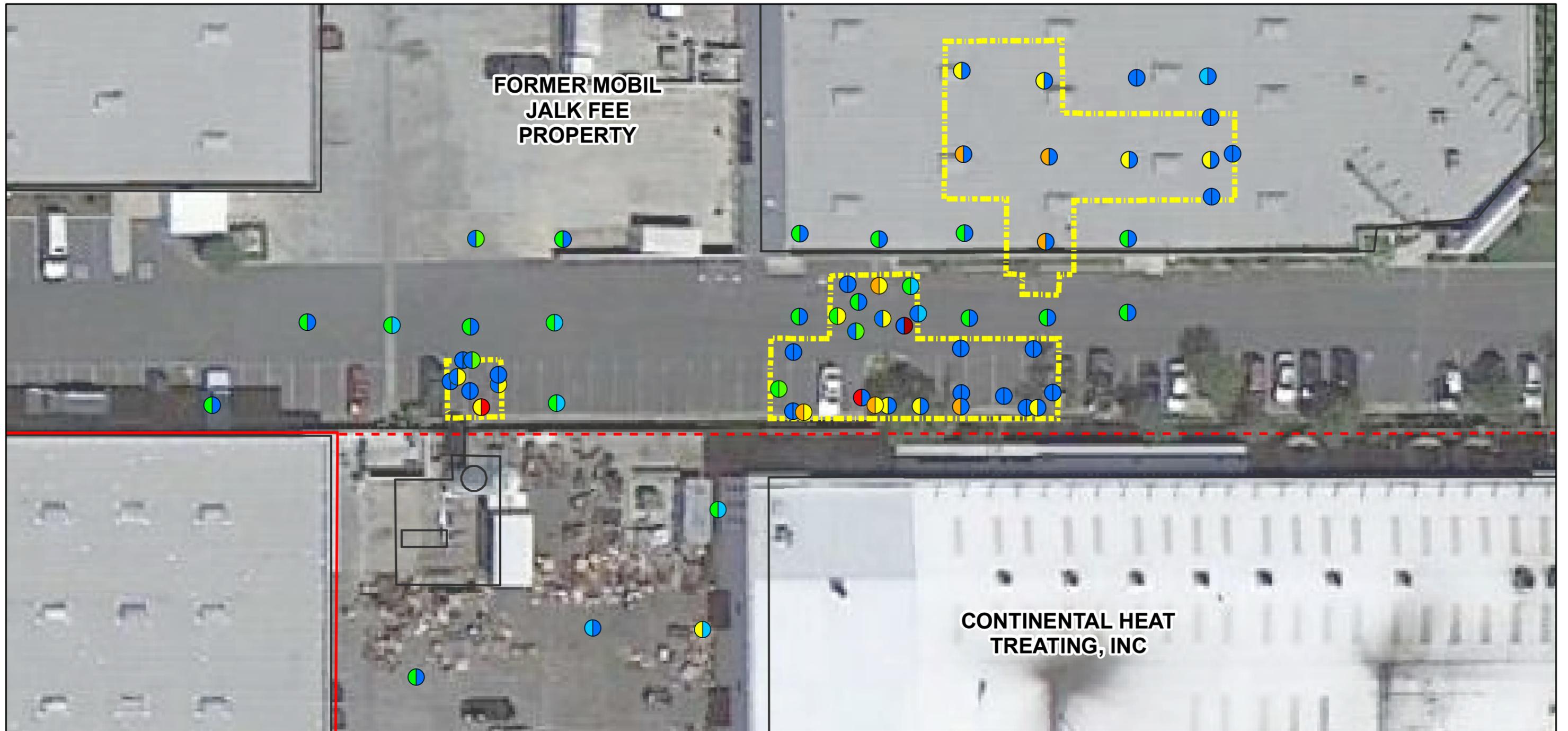
⁵ TCE - trichloroethene.

⁶ Total remaining VOCs including acetone and methylene chloride which are possible laboratory contaminants.

Note: Results in blue font italics were excavated.

APPENDIX AD

JANUARY 2014 NEWFIELDS FIGURE 4.6



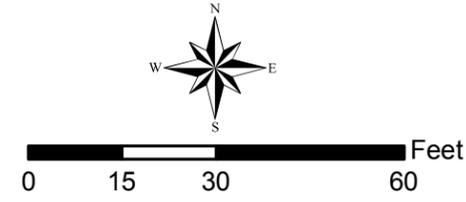
**FORMER MOBIL
JALK FEE
PROPERTY**

**CONTINENTAL HEAT
TREATING, INC**

Legend

MEASURED IN PPM PCE	MEASURED IN PPM TRPH
● < 1.00	● < 1.00
● 1.01 - 10.00	● 1.01 - 10.00
● 10.01 - 100.00	● 10.01 - 100.00
● 100.01 - 1,000.00	● 100.01 - 1,000.00
● 1,000.01 - 10,000.00	● 1,000.01 - 10,000.00
● 10,000.01 - 100,000.00	● 10,000.01 - 100,000.00
● > 100,000.01	

- BUILDING
- EXCAVATION AREA [1998]
- PROPERTY LINE
- TETRACHLOROETHENE (PCE)
- TOTAL RECOVERABLE PETROLEUM (TRPH)



- Notes:
1. All locations and dimensions are approximate.
 2. Excavation area and excavation soil samples for 1998 was taken from the Alton Remedial Excavation/ Site Closure Report, October 14, 1998.
 3. Petroleum hydrocarbons measured as total recoverable Petroleum Hydrocarbons

NewFields 600 Jefferson St., Suite 1040
Houston, Texas 77002
(713) 357-5244

FIGURE 4.6
PCE - TPH
CONCENTRATIONS IN SOIL
Former ExxonMobil, Jalk Fee Property
10607 Norwalk Boulevard,
Santa Fe Springs, CA

Los Angeles Regional Water Quality Control Board

July 22, 2016

Ms. Marla Madden
ExxonMobil Environmental Services Co.
18685 Main Street, Suite 101, PMB 601
Huntington Beach, CA 92648

RETURN MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7015 0640 0006 6057 5019

SUBJECT: RESPONSE TO “REQUEST TO NAME CONTINENTAL HEAT TREATING AS DISCHARGER”, PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER DATED AUGUST 24, 2010

SITE: FORMER EXXONMOBIL JALK FEE PROPERTY, 10607 NORWALK BOULEVARD, SANTA FE SPRINGS, CA (SCP NO. 0203, SITE ID NO. 1848000)

Dear Ms. Madden:

The Los Angeles Regional Water Quality Control Board (Regional Board) reviewed the March 25, 2015, *Request to Name Continental Heat Treating as Discharger* (Report), prepared and submitted by Cardno ERI on your behalf, for the referenced site. In the Report, ExxonMobil Environmental Services Company (ExxonMobil) requests the Regional Board to rescind the California Water Code (CWC) section 13267 order dated August 24, 2010 (Order) issued to ExxonMobil, based on its conclusions that the Continental Heat Treating (CHT) site is a source of the chlorinated solvents in soil and groundwater at and near the Former ExxonMobil Jalk Fee Property (Site). The Regional Board agrees that the CHT site is a source of chlorinated solvents and issued a CWC section 13267 order dated May 5, 2010 to CHT to investigate and delineate the extent of contamination in soil, soil-gas, and groundwater from releases at the CHT facility. The Regional Board, however, disagrees with ExxonMobil’s conclusion that CHT is the sole source of chlorinated solvents because soil, soil vapor, and groundwater data collected at the Site indicates on-site discharges. Below are ExxonMobil’s comments (italicized) provided in the Report, followed by the Regional Board’s detailed responses:

1. *The evidence presented by EMES is consistent with the same conclusions the CRWQCB-LAR has already reached, as demonstrated by the CRWQCB-LAR's letter dated June 23, 2010 to CHT (Appendix A). The CRWQCB-LAR stated that significant quantities of PCE were stored and used by CHT, that primary sources of PCE contamination (degreaser, storage area, etc.) have been identified at the CHT property, that releases of chlorinated solvents at CHT have impacted the subsurface, that the pipe trench leading from the degreaser to the north end of the building may have created a potential preferential pathway for the migration of PCE, and that no primary sources of PCE contamination have been identified on the Jalk Fee property.*

The CHT site is located to the south and adjacent to the Site (Figure 1, enclosed), and under oversight by the Regional Board, as a separate case. The Regional Board issued CHT a CWC section 13267 order dated May 5, 2010 to investigate soil, soil gas, and groundwater contamination as a result of their own releases. On May 19, 2010, CHT provided comments to the May 5, 2010 order, indicating that the Regional Board cited numerous erroneous allegations.

On June 23, 2010, the Regional Board provided responses to CHT's May 19, 2010 letter and presented the sources of information for the citations made, and stated that no primary source(s) of tetrachloroethene (PCE) contamination have been identified at the Site. However, investigations conducted at the Site in 2011 encountered PCE in soil and groundwater at concentrations up to 6,600 micrograms per kilogram ($\mu\text{g}/\text{kg}$), and 1,800 micrograms per liter ($\mu\text{g}/\text{L}$), respectively. Based on these analytical results, the Regional Board determined that volatile organic compounds (VOCs) detected in soil have threatened groundwater quality, and required ExxonMobil to further investigate soil matrix, soil vapor, and groundwater at the Site.

2. *From the 1920s until its redevelopment in 2003, the Jalk Fee property had a dirt surface and was unpaved, as can be observed in the historical aerial photos, which would allow rainwater and spills/releases from the adjacent paved CHT property to run off onto and infiltrate into the upper vadose zone of the Jalk Fee property (see Plate 1 and Appendix B for the historical aerial photos).*

ExxonMobil's rationale cannot explain that PCE was detected in a soil sample collected at 10 feet below ground surface (bgs) at a concentration of 5,460 $\mu\text{g}/\text{kg}$ in soil boring B22 at the Site. This boring is located approximately 140 feet north of the property boundary with the CHT site. This data indicates an on-site release or discharge at the Site.

3. *ExxonMobil has had internal discussions with its personnel who managed oil field operations at various locations, who confirmed that chlorinated solvents were not standard chemicals used in its oil field production operations. This is reinforced by the CRWQCB-LAR's letter dated June 23, 2010 to CHT, which stated that the "Jalk Fee property was used for oil production operations and no primary sources(s) of PCE contamination have been identified [on the property]" (Appendix A). Additionally, file reviews conducted with the City of Santa Fe Springs and the County of Los Angeles did not identify agency records or NOVs, indicating that chlorinated solvents were stored, used, or released onto the Jalk Fee property (Appendix C).*

Please see Regional Board's response to Item No. 1 regarding the Regional Board letter dated June 23, 2010 that stated that the "Jalk Fee property was used for oil production operations and no primary sources(s) of PCE contamination have been identified [on the property]".

Appendix C is incomplete, and does not provide all the documents to support ExxonMobil's file review process.

4. *In 2014, Cardno ERI conducted a review of the State Water Resources Control Board's online GeoTracker information database of various oil field sites across the State of California that had current or closed environmental cases, and was unable to identify any*

oil field site that had chlorinated solvents as a contaminant of concern. Additionally, Cardno ERI spoke with representatives of the County of Santa Barbara Environmental Health Services and the California Regional Water Quality Control Board - Central Valley Region, which are agencies that have extensive oil field operations and clean-up projects in their areas of responsibility, and the representatives from both agencies were not aware of any oil field sites within their jurisdictions that had chlorinated solvent contamination.

Data collected at the Site indicates on-site discharge or release of chlorinated solvents at the Site (See Regional Board's responses to Items No. 1, 2, and 9).

5. *Levine-Fricke's report dated December 6, 1991 claims that a tenant of Mobil who rented the Jalk Fee property may have used chlorinated solvents on the eastern portion of the property (Levine-Fricke, 1991). The report does not cite any source evidence for this statement, and ExxonMobil is unaware of any information that supports this claim. Furthermore, ExxonMobil has conducted extensive reviews of its lease files and has no record that any company or person rented the property during its period of operation or ownership, other than Hathaway.*

As stated previously, Hathaway was an oil production company, and oil field operators did not use solvents as standard chemicals. Thus, there is no evidence that ExxonMobil, a tenant, or the subsequent property owners and their tenants ever used chlorinated solvents on the property. Therefore, there is no primary source of chlorinated solvents from historical operations on the Jalk Fee property, and the chlorinated solvents in soil must be from an off-site source.

A figure on the May 13, 1997, "Work Plan for Site Characterization Activities and Proposed Environmental Fate Modeling and Health Risk Assessment", displays an area at the Site identified as "approximate location of former trucking operations area" (Figure 2, enclosed). PCE was detected at a concentration of 5,460 µg/kg in a sandy soil sample collected at 10 feet bgs from soil boring B22. Boring B22 is located within the "approximate location of former trucking operations area" at the Site.

In addition, the October 2002, "Exemption of Oil and Gas Exploration and Production Wastes from Federal Hazardous Waste Regulations", published by the United States Environmental Protection Agency (USEPA), lists waste generated during oil exploration activities, among them waste solvents.

6. *History of CHT Property*

The building that is currently present at the CHT property was constructed in 1969, at which time the majority of the property would also have been paved for parking, as is apparent in aerial photographs of the site (Appendix B). Based on information provided by CHT, since commencing operations at the site, the CHT business has cleaned metal parts and processed them with heat. This process requires the cleaning of the metal parts to remove cutting oil and debris, which was performed by placing the metal parts in a solvent-based vapor degreaser. Thus, CHT conducted degreasing operations and used chlorinated solvents from approximately 1969 to 1995, as supported by the following documentation [Appendix D through Appendix N].

Regional Board staff has reviewed the information included in Appendices D through N. In summary, the appendices indicated the following:

- CHT used PCE in its degreasing operations.
- Discharges of PCE from degreasing operations at the CHT site impacted soil at CHT. PCE was detected in soil samples collected at approximately 10 feet below ground surface (bgs) in the immediate vicinity of a degreaser, at a concentration of 7,514 µg/kg.
- CHT stored waste solvents in drums at their site and drums were transported to an off-site facility.

This information does not demonstrate that chlorinated solvent contamination at the Site solely originates from CHT. The Regional Board acknowledges that on-site discharges or releases of chlorinated solvents occurred at the CHT site as a result of their operations. The Regional Board issued a California Water Code section 13267 order dated May 5, 2010 to CHT to investigate the extent of impacted soil, soil gas, and groundwater.

7. *As shown in these building records, CHT performed vapor degreasing at the property from approximately 1969 through 1995, which necessitated the storage of hundreds of gallons of chlorinated solvents at any time on the property and the generation of significant quantities of waste solvent, such as 2,200 gallons per year in the 1989 record. Over this 26-year operational period, the records show that CHT had one degreaser in the eastern portion on the building (Detrex #19); a second degreaser in the central portion of the building (Item #81), which is the location that is the most consistent with depictions in the reports submitted by CHT to the CRWQCB-LAR; a third degreaser along the western end of the building; and possibly a fourth degreaser at an unidentified location along the northern edge of the building.*

This information supports the presence of on-site source(s) of chlorinated solvents at the CHT facility/site that impacted soil, soil vapor, and groundwater beneath the CHT site. This information does not support the claim that there is no source of PCE contamination identified on the Site.

8. *In addition to the degreasing operations inside the building and the storage of waste PCE in the southwestern area of the property, it also appears that CHT utilized the northwestern portion of the property as an equipment storage and repair area based on review of the historical aerial photos and several reports (Appendices B and O). Given that storage and repair of equipment occurred in this area of the site, it is likely that the cleaning of parts also occurred here, which is directly adjacent to the area of the Jalk Fee property where the highest PCE concentrations have been observed (Plate 1).*

In addition to the equipment storage and repair area located in the northwestern portion of CHT's property, a trucking operations area was located at the Site. (See Regional Board response to Item No. 5).

9. *Regulatory oversight and inspections started to become more common in the late 1970s and early 1980s. These regulatory inspections demonstrate CHT's practices resulted in numerous documented releases and spills to the ground throughout at the property. The various inspections, investigation reports and violations are summarized below and documented in*

Appendices G, I, N and P through AC.

Regional Board staff has reviewed the information included in the referenced appendices. In summary, the appendices indicated the following:

- Wastewater was discharged from the cooling tower located on the northeast section of the CHT property to Norwalk Boulevard.
- Soil impacted with oil was encountered at the CHT property.
- Oil was encountered in a clarifier.
- Degreaser fires were reported.
- Soil in the immediate vicinity of the degreaser (inside the CHT building) is impacted with PCE at a concentration of 7,514 µg/kg.

This information does not change the Regional Board's conclusion that on-site sources of chlorinated solvents are located at the Site. The conclusion is based on soil data from B-11 and B-22 obtained from the Site, the "approximate location of former trucking operations area" at the Site, and the 2002 USEPA publication referenced in our response to Item No. 5.

10. *First, the 1968 blueprints Therefore, these trenches would provide a preferential pathway directly from the degreasers to the northern edge of the CHT building and the southern boundary of the Jalk Fee property, allowing the migration of chlorinated solvent vapors (Appendix D). The CRWQCB-LAR reached much the same conclusion in its letter dated June 23, 2010 (Appendix A).*

Soil, soil vapor, and groundwater data collected at the CHT site indicates the presence of at least one on-site source beneath the existing building.

Likewise, data collected at the Site indicates the presence of at least two on-site sources, one at the southern side close to the property boundary with CHT, and another one at the central portion of the Site.

11. *Second, extensive assessment has been conducted in the southeastern portion of the Jalk Fee property and the northwestern portion of the CHT property, which has allowed for a thorough understanding of the near surface vadose zone lithology between the two properties. Two cross-sections were generated for the area to the west of the CHT building and surrounding Jalk Fee well MW6, where the maximum PCE concentrations have been detected on the Jalk Fee property (Appendix Z, Figures 5.1.1 and 5.1.2). In addition, plan view figures of the distribution of low (clay/silt) and high permeability soils (sand) at 6, 10 and 16 feet bgs of the CHT and Jalk Fee property boundary area show that a laterally continuous, shallow, low permeability silt/clay layer is present under much of the CHT property (Appendix AA, Figures 5.2.1, 5.2.2 and 5.2.3). This silt/clay layer starts to dip along the northern part of the CHT property and continues to dip northward onto the Jalk Fee property to a depth of 15 to 16 feet bgs. Soil above the silt/clay layer on the northern CHT property and on the Jalk Fee property is generally characterized as sand. It should be remembered that the Jalk Fee property was unpaved and essentially an open field until 2003. Therefore, chlorinated solvents released by CHT along the northern portion of the CHT property or directly released onto the Jalk Fee property would infiltrate downward through the higher*

permeability surface sand until reaching the low permeability unit and then would migrate along the northward dipping contact between the high and low permeability units onto the Jalk Fee property.

ExxonMobil's explanation of the migration of chlorinated solvents from the CHT site to the Site is not adequately supported. For example, in a cross section generated by Regional Board staff, including SVP-1 (southern part of the Site) and MW-2 (northern CHT), a silty layer dips from the southern part of the Site to the northern part of the CHT property. This silty layer would serve as a pathway for contaminants to migrate from the Site to CHT (Figure 3, enclosed).

The Report (Figure 5.1.2, enclosed) assumed that a silty layer on B14, extends laterally for approximately 55 feet towards MW6 (distance between B14 and MW6, both on CHT). Then, the silty layer would continue laterally from MW6 towards B11 (Site). This silty layer would serve as a migration pathway for VOCs to migrate from CHT (B14 and MW6) to the Site (B11). The silty layer that serves as a migration pathway extends vertically on B11 from approximately 24 to 39 feet bgs.

However, ExxonMobil's model cannot explain the vertical distribution of PCE on B11. PCE was detected in soil samples collected at 10 and 15 feet bgs at concentration of 5,360 micrograms per kilogram ($\mu\text{g}/\text{kg}$) and 11,000 $\mu\text{g}/\text{kg}$, respectively. However, in a soil sample collected at 35 feet bgs, PCE was detected at 937 $\mu\text{g}/\text{kg}$ (Figure 4, enclosed).

12. *Specifically, chlorinated solvents were measured in soil at concentrations from south to north of 2,517 mg/kg at 4 feet bgs at location T9A-1A (a trench excavation sample located 10 feet north of the property boundary), 350.8 mg/kg at 15 feet bgs at location EX2-26 (an excavation verification sample collected 30 feet north from the property line), and 59,800 mg/kg at 15 feet bgs at location GP-6 (a geophone sample located 45 feet north of the property boundary) (Appendix AC). These samples all occurred in sand, and the two samples collected at a depth of 15 feet bgs are located at the contact between the sand and clay/silt units. Specifically, sample EX2-26 is located along a sand-clay/silt basal contact, and the GP-6 sample from 15 feet bgs is located at a sand-clay/silt lateral contact. The relationship between the stratigraphic contacts and the distribution of elevated chlorinated solvent concentrations suggests that the solvent-containing soil in this area is derived from a lateral transport mechanism. This is further supported by the soil samples collected in the vicinity of location GP-6, which are significantly lower in total chlorinated solvent concentrations. Specifically, the two samples collected from location GP-6 at shallower depths (5 and 10 feet bgs) had total chlorinated solvent concentrations of 0.33 mg/kg and 0.021 mg/kg, respectively, and the soil sample collected above sample EX2-26 at 6 feet bgs [sample EX2-26(A)] had a total chlorinated solvent concentration of 0.715 mg/kg (Appendix AC). This distribution pattern indicates that surface releases of chlorinated solvents were not occurring in these areas, as surface releases would have resulted in similar to higher concentrations of chlorinated solvents with residual saturation in the shallower soil sample.*

Not all existing data collected to date supports ExxonMobil's explanation on the lateral migration of chlorinated solvents from the CHT site to the Site. For example, the soil type for boring SB-1, located at approximately 5 feet of T9A-1A was described as silt from ground surface to approximately 25 feet bgs. The soil type for soil boring SB-3, located at approximately 15

feet of GP-6 was described as silt from ground surface to approximately 39 feet bgs. The soil type description of SB-1 and SB-3 does not support ExxonMobil's assumption of the presence of a sand-silt contact at approximately 15 feet bgs, that serves as a pathway for VOCs to migrate from CHT to the Site.

13. *Furthermore, the presence of the elevated shallow detections abutting the CHT-ExxonMobil property line supports that chlorinated solvent release(s) occurred in the vicinity of the property line and transport occurred to the north onto the Jalk Fee property. This transport was likely facilitated by runoff from the CHT property (including roof runoff from the CHT building), which caused the movement of chlorinated solvents away from the property line onto the Jalk Fee property.*

Soil data indicate that there are silty/clay layers dipping from the Site to the CHT site (see Regional Board responses to Items No. 11 and 12). Therefore, roof runoff from the CHT building would not facilitate all contaminant migration from the CHT site to the Site.

14. *Elevated concentrations of total petroleum hydrocarbons and chlorinated hydrocarbons, however, are generally not co-located across the majority of the Jalk Fee (Appendix AD, Figure 4.6). For example, the TPH concentrations in the northern excavation areas do not contain chlorinated solvents, whereas several of the near surface soil samples collected in the vicinity of the property line contain both elevated TPH and chlorinated solvents. Although the soil samples in the vicinity of the property line contain both chlorinated solvents and TPH, the respective concentrations are generally both low, or with either PCE or TPH significantly higher in concentration than the other constituent. These results reinforce the site conceptual model in which chlorinated solvents from CHT released along the northern portion of the CHT property or directly onto the Jalk Fee property infiltrated downward through the higher permeability surface sand, until reaching the low permeability unit, and then migrated along the northward dipping contact between the high and low permeability units onto the Jalk Fee property.*

The existing soil and analytical data do not support ExxonMobil's site conceptual model. (See Regional Board responses to Items No. 11 and 12.) For example, PCE was detected at a concentration of 5,460 µg/kg (B22 at 10 feet bgs), and a concentration of 1,120 µg/kg (SVP7 at 5 feet bgs). B22 and SVP7 are located northwest of the excavation area, at approximately 140 and 90 feet north of the property boundary, respectively. These PCE concentrations at shallow depths indicate the presence of on-site release or discharge at the Site and cannot be explained with ExxonMobil's site conceptual model.

15. *Based on the evidence provided, it has been demonstrated that CHT is the source of the chlorinated solvents observed in soil beneath the CHT, Jalk Fee and 10711 Norwalk Blvd properties. Therefore, EMES, on behalf of ExxonMobil, requests that the CRWQCB-LAR identify CHT as the discharger and responsible party for the chlorinated solvents identified on the CHT, Jalk Fee and 10711 Norwalk Boulevard properties; rescind its Order dated August 24, 2010 requiring ExxonMobil to assess and monitor the extent of chlorinated solvents; and formally remove ExxonMobil as the named discharger and responsible party for the chlorinated solvent.*

The Regional Board acknowledges that CHT is a source of chlorinated solvents found at the CHT site, and contaminant plumes in groundwater found at both properties (CHT, and the Site) may have commingled. However, data collected and submitted to date (including, but not limited to, the contaminant fate and transport, and configuration of the plumes in soil matrix, soil vapor, and groundwater) have not indicated that the sources of chlorinated solvents in soil and groundwater found beneath the Site and suspected beneath the 10711 Norwalk Boulevard property properties, solely originated at or from the CHT site. To the contrary, the data demonstrates that there is an on-site discharge/release of chlorinated solvents that is independent of the chlorinated solvents on the CHT site.

In summary, based on existing soil matrix and soil vapor data collected at the Site and in the immediate vicinity including the northern portion of the CHT property, the Regional Board continues to hold that ExxonMobil has discharged, discharges, or is suspected of having discharged waste that could affect the quality of waters of the state. Therefore, the Regional Board is not rescinding its Order dated August 24, 2010, and the December 21, 2011 amendment to the Order, requiring ExxonMobil Environmental Services to adequately define the vertical and lateral extent of VOCs in soil matrix, soil vapor, and groundwater, originating from or encountered at the Site. Pursuant to the Order, you are required to continue soil matrix, soil gas and groundwater investigations to define the vertical and lateral extent of contamination originating from the Site.

If you have any questions, please contact Mr. Luis Changkuon, Project Manager, at (213) 576-6667 or luis.changkuon@waterboards.ca.gov.

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures: Figure 1: Site Map
Figure 2: Map of the Former Jalk Fee site
Figure 3: Cross section SVP1 – MW2
Figure 5.1.2
Figure 4: Soil concentrations on cross section 5.1.2

cc: Mr. James Anderson, Cardno ERI
Mr. John Maple
Ms. Michelle F. Smith
Mr. Thomas Clark, Coast Aluminum and Architectural, Inc.
Mr. William Macnider, CSI Electric Contractors
Mr. James Stull, Continental Heat Treating
Mr. Michael Francis, Demetriou, Del Guercio, Springer & Francis, LLP
Ms. Ashley Arthur/Mr. Howard Schwimmer, Rexford Industrial Realty, LP
Mr. Jeremy Jungreis, Rutan & Tucker, LLP
Mr. Rick Fero, Fero Environmental Engineering, Inc.
Mr. Wayne Praskins, United States Environmental Protection Agency
Mr. Gene Lucero, Omega Chemical Site Potentially Responsible Parties Organized Group

EXPLANATION

- MW11C Groundwater monitoring well
- MW8A/B/C Nested groundwater monitoring well
- MW-6S Continental Heat Treating groundwater monitoring well
- FVP-20 Continental Heat Treating soil vapor sampling probes
- B1/VIEW Soil vapor extraction well
- SVP7 Soil vapor sampling well
- SVP14 Deep multi-depth soil vapor well
- SVP13 Shallow multi-depth soil vapor well
- PVP-1A Continental Heat Treating soil sample location
- B23 Soil boring

GENERALIZED SITE PLAN

FORMER EXXONMOBIL JALK FEE PROPERTY
10807 Norwalk Boulevard
Santa Fe Springs, California

PROJECT NO. 1155
PLATE 1
DATE: 03/24/15

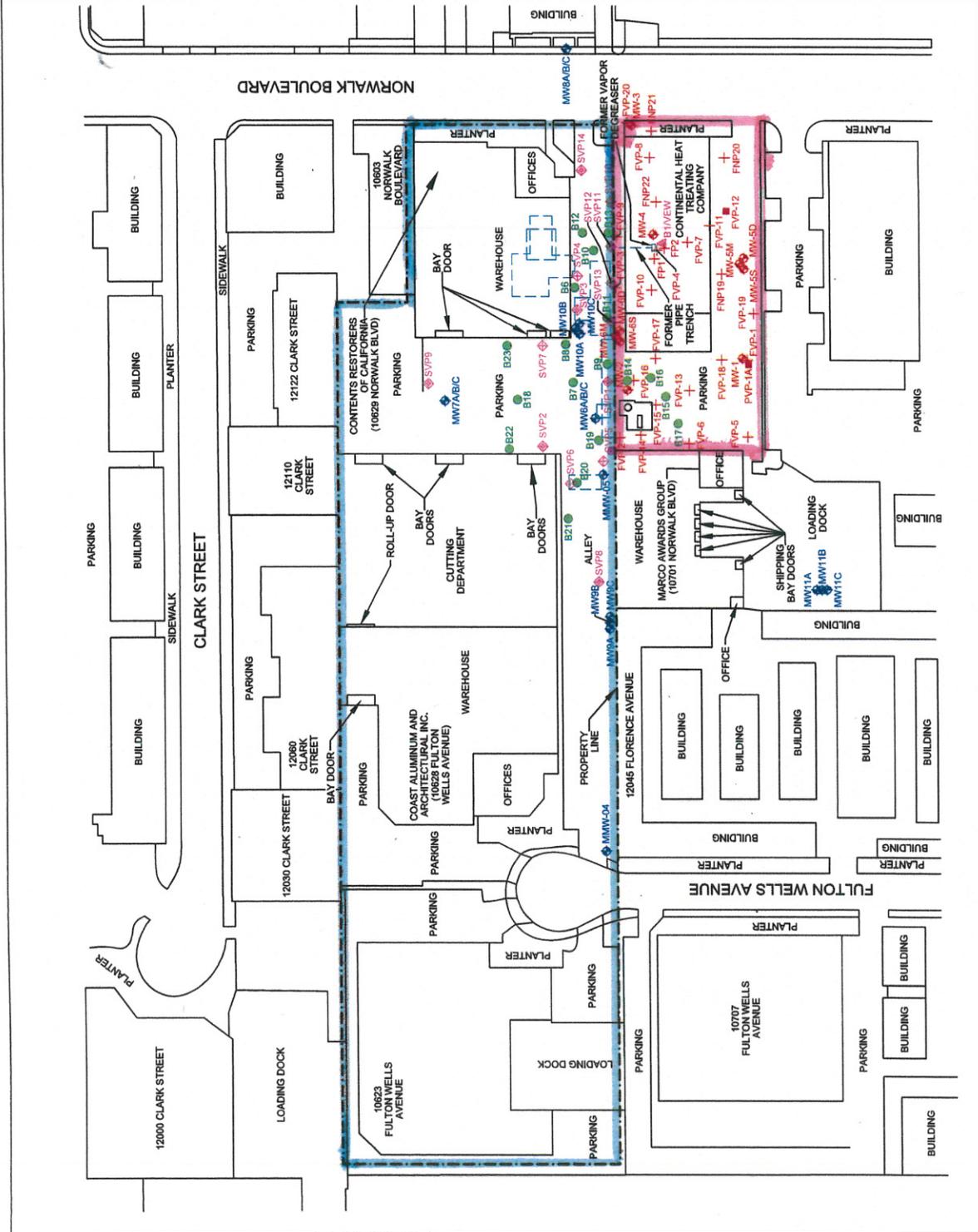
Cardno ERI
Shaping the Future

FN11550008

SOURCE: Modified from a map GOOGLE EARTH

APPROXIMATE SCALE

0 120 240 FEET



Continental Heat Treating site

Jalk Fee site



LEGEND

MMW-5

Monitoring Well

117

Operational Oil Well

Chainlink Fence

Gate

SCALE (FEET)



Source:
Modified from a map created by
McLaren-Hart

SITE PLAN

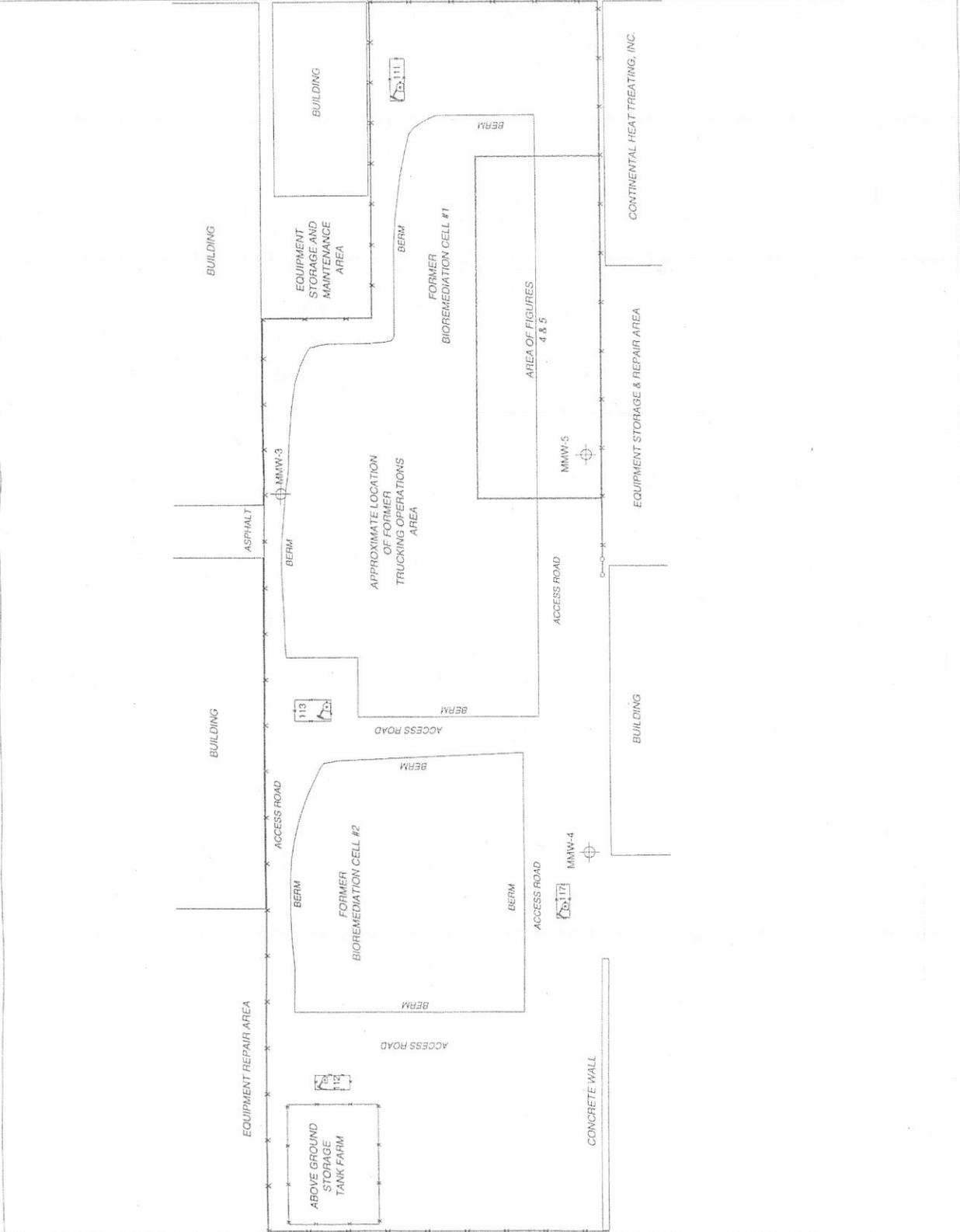
Mobil Jalik Fee Property
10607 Norwalk Boulevard
Santa Fe Springs, California

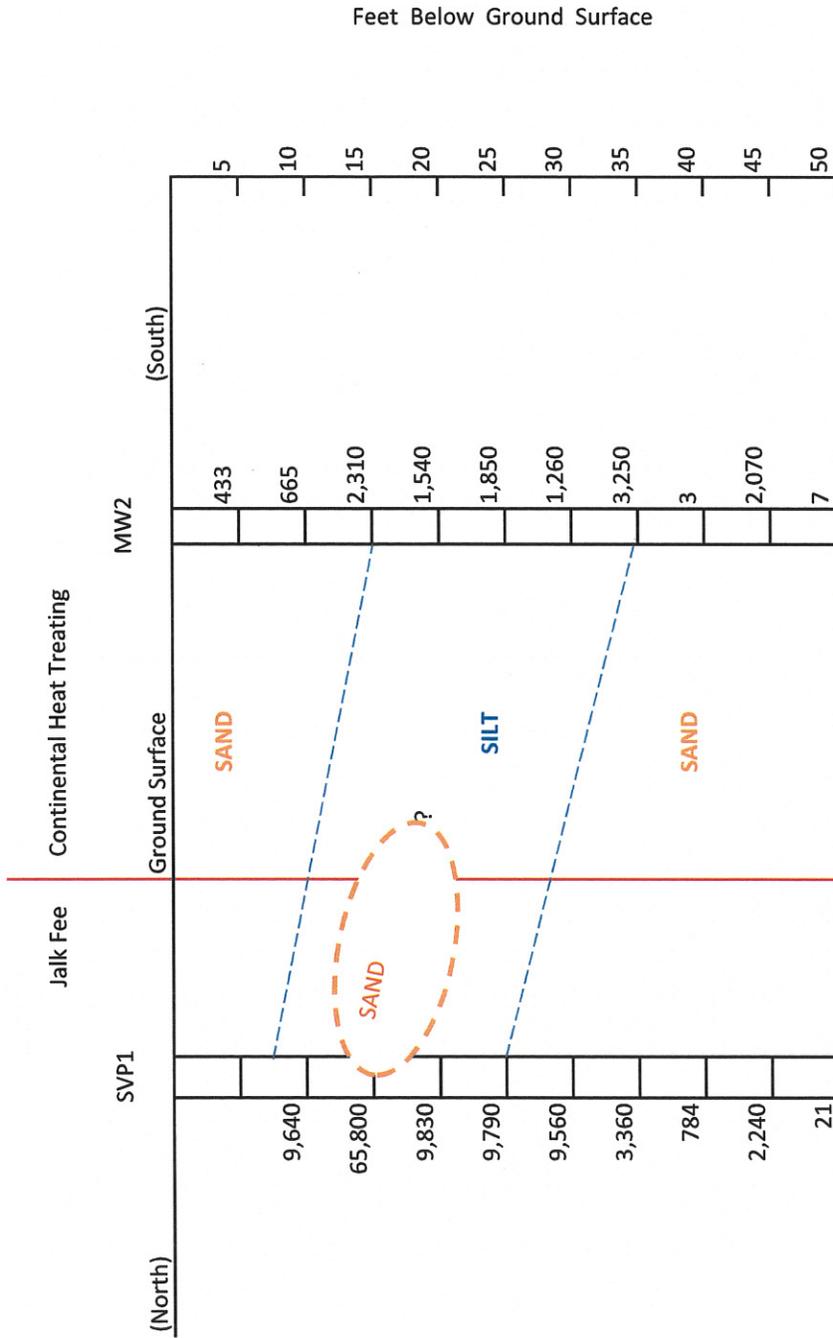


**ALTON
GEOSCIENCE**
Irvine, California

FIGURE 2

23-0134 SITE 3/1997 .JPG





LEGEND

9,460 Tetrahydroethane concentration in soil (micrograms per kilogram)

Property Boundary

SVP1 Located at Jalk Fee

MW2 Located at Continental Heat Treating

Inferred contact

FIGURE 3

Cross Section

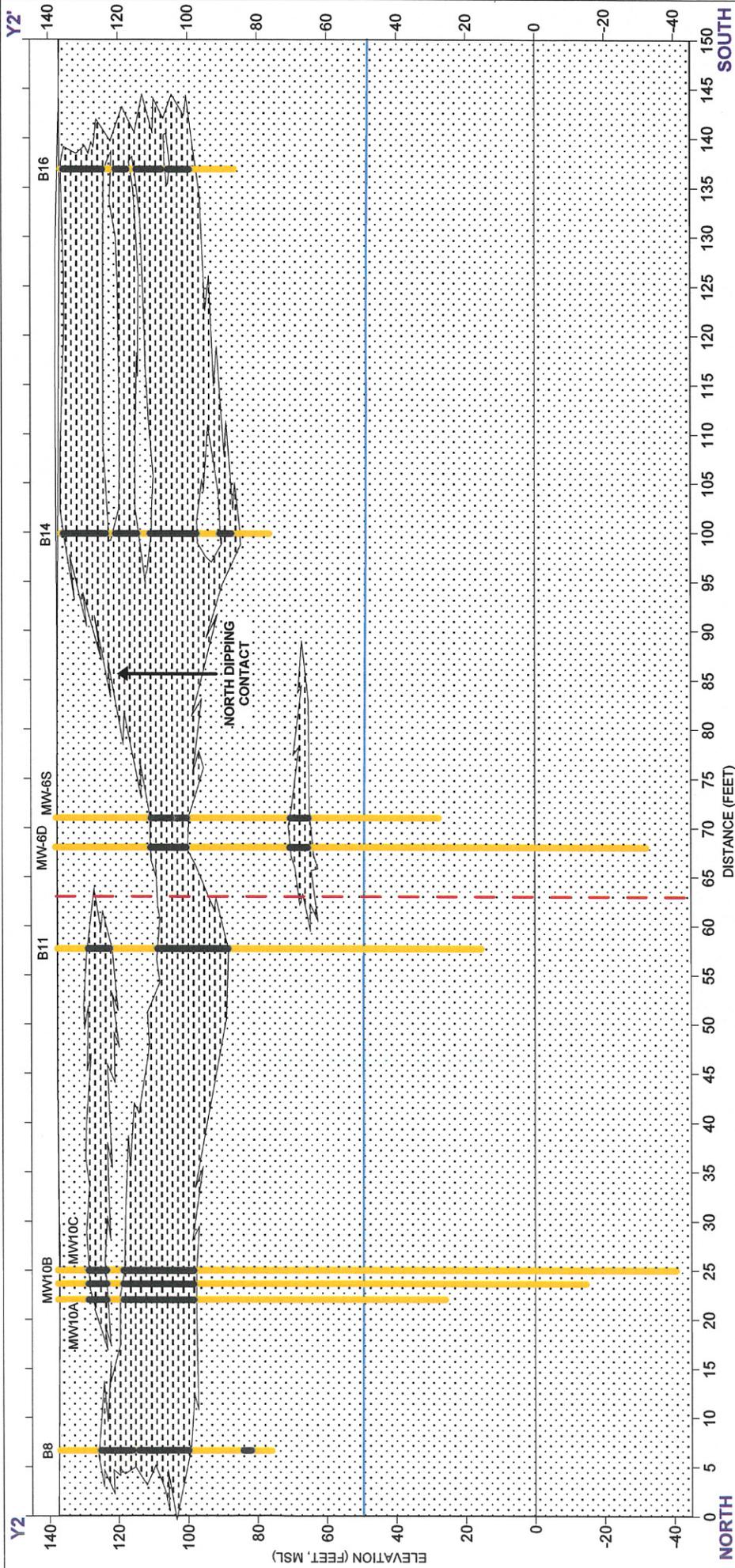
SVP1 - MW2

Former Jalk Fee Property

10607 Norwalk Boulevard

Santa Fe Springs, CA

Note: Approximate horizontal distance between SVP1 and MW2 is 30 Feet



NewFields
 600 Jefferson St., Suite 1040
 Houston, Texas 77002
 (713) 357-5244

FIGURE 5.1.2
Y2 - Y2'
CROSS SECTION
(NORTH - SOUTH)

Former ExxonMobil, Jalk Fee Property
 10607 Norwalk Boulevard,
 Santa Fe Springs, CA

Notes:

1. All locations and dimensions are approximate.
2. Well diameters are not drawn to scale.
3. MSL - Mean Sea Level.
4. Groundwater elevations were taken in November 2012.
5. MW-6S and MW-6D share the same location and are separated to show detail.
6. MW10A, MW10B, and MW10C share the same location and are separated to show detail.

Legend

- SAND LAYER (Yellow background)
- SILT LAYER (White background)
- GROUNDWATER ELEVATION (Blue line)
- PROPERTY BOUNDARY (Red dashed line)
- SAND (Dotted pattern)
- SILT (Cross-hatched pattern)

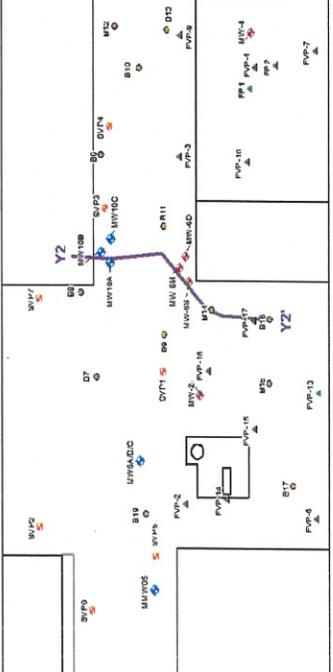
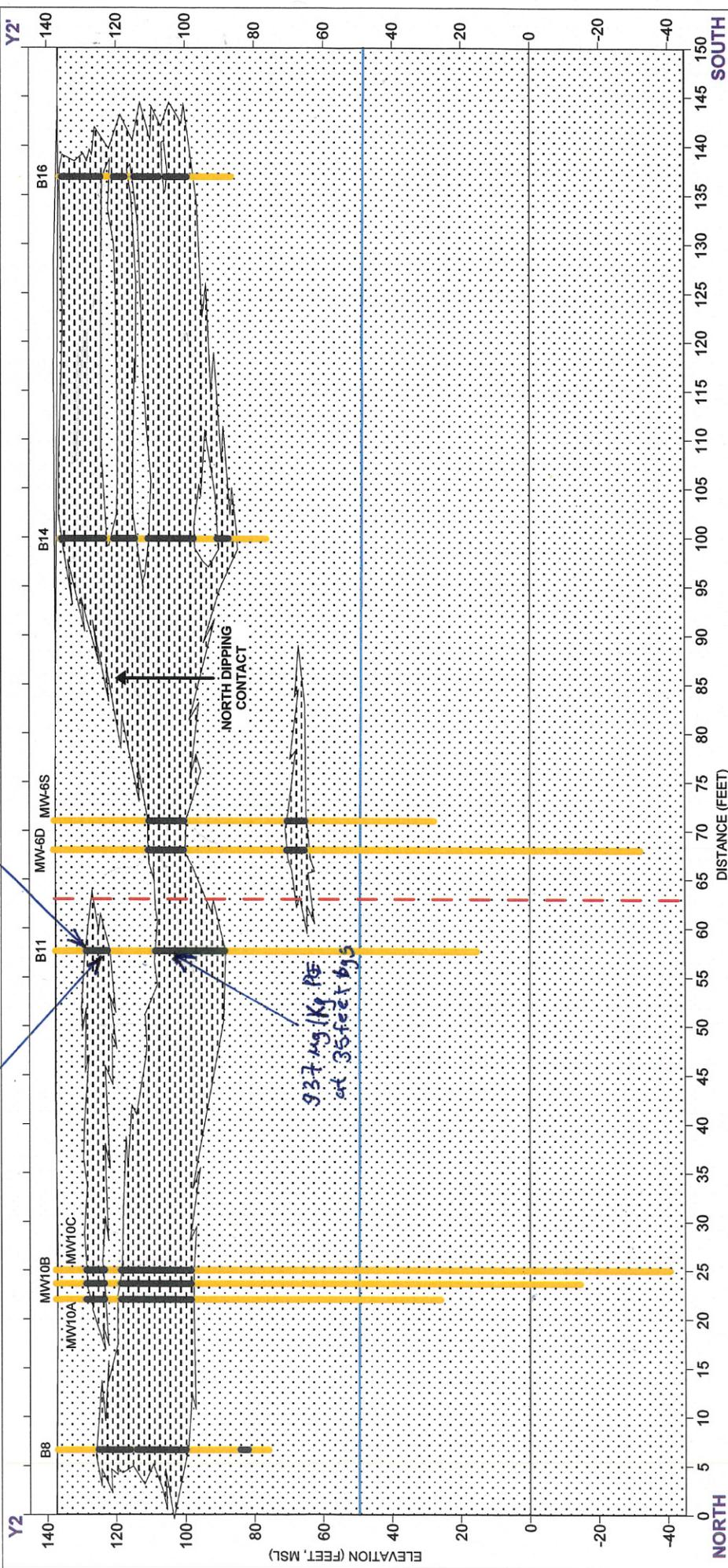


FIGURE 4

5,360 µg/kg PCE
at 5 feet bgs

11,000 µg/kg PCE
at 15 feet bgs

937 µg/kg PE
at 35 feet bgs



NewFields
600 Jefferson St., Suite 1040
Houston, Texas 77002
(713) 357-5244

FIGURE 5.1.2
Y2 - Y2'
CROSS SECTION
(NORTH - SOUTH)

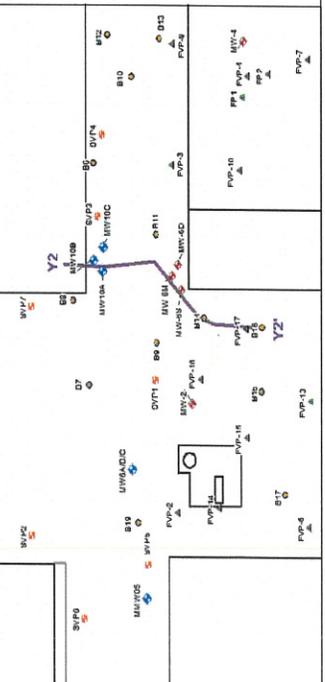
Former ExxonMobil, Jalk Fee Property
10607 Norwalk Boulevard,
Santa Fe Springs, CA

Notes:

- All locations and dimensions are approximate.
- Well diameters are not drawn to scale.
- MSL - Mean Sea Level.
- Groundwater elevations were taken in November 2012.
- MW-6S and MW-6D share the same location and are separated to show detail.
- MW10A, MW10B, and MW10C share the same location and are separated to show detail.

Legend

- SAND LAYER (dotted pattern)
- SILT LAYER (cross-hatched pattern)
- GROUNDWATER ELEVATION (solid line)
- PROPERTY BOUNDARY (dashed line)
- SAND (dotted pattern)
- SILT (cross-hatched pattern)



1 **PROOF OF SERVICE**

2 I, Rhonda M. Cole, declare:

3 I am a citizen of the United States and employed in Los Angeles County, California. I am
4 over the age of eighteen years and not a party to the within-entitled action. My business address
5 is 555 South Flower Street, Forty-First Floor, Los Angeles, California 90071. On December 19,
6 2016, I served a copy of the within document(s): ***PETITION FOR REVIEW AND REQUEST
7 FOR HEARING AND STAY***

8 by transmitting via facsimile the document(s) listed above to the fax number(s) set
9 forth below on this date before 5:00 p.m.

10 by placing the document(s) listed above in a sealed envelope with postage thereon
11 fully prepaid, in the United States mail at Los Angeles, California addressed as set
12 forth below.

13 by placing the document(s) listed above in a sealed Federal Express envelope and
14 affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal
15 Express agent for delivery.

16 by personally delivering the document(s) listed above to the person(s) at the
17 address(es) set forth below.

18 by transmitting via e-mail or other electronic transmission the document(s) listed
19 above to the person(s) at the e-mail address(es) set forth below.

20 **By Email**

21 State Water Resources Control Board
22 waterqualitypetitions@waterboards.ca.gov

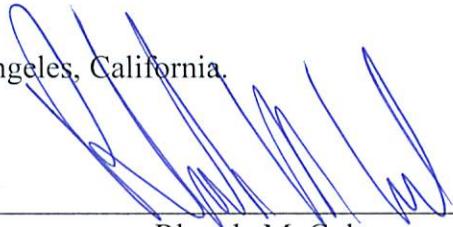
23 **By Email and U.S. Mail**

24 Samuel Unger, Executive Officer
25 Los Angeles Regional Water Quality Control Board
26 320 W. 4th Street, Suite 200
27 Los Angeles, CA 90013
28 Samuel.Unger@waterboards.ca.gov

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

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

Executed on December 19, 2016, at Los Angeles, California.



Rhonda M. Cole

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1 **NORTON ROSE FULBRIGHT US LLP**
2 **ELIZABETH M. WEAVER**
3 **LAUREN A. SHOOR (BAR NO. 280788)**
4 **555 South Flower Street**
5 **Forty-First Floor**
6 **Los Angeles, California 90071**
7 **Telephone: (213) 892-9200**
8 **Facsimile: (213) 892-9494**
9 **elizabeth.weaver@nortonrosefulbright.com**
10 **lauren.shoor@nortonrosefulbright.com**

11 **Attorneys for Respondent**
12 **EXXONMOBIL OIL CORPORATION**

13 **BEFORE THE STATE OF CALIFORNIA**
14 **STATE WATER RESOURCES CONTROL BOARD**

15 **IN THE MATTER OF THE PETITION OF**
16 **FORMER EXXONMOBIL JALK FEE**
17 **PROPERTY**

18 **California Regional Water Quality Control**
19 **Board, Los Angeles Region**

Case No. _____

**DECLARATION OF LEN RACIOPPI IN
SUPPORT OF PETITION FOR REVIEW
AND REQUEST FOR HEARING AND
STAY**

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

(Cal. Water Code § 13320; Cal. Code Regs. tit.
23 § 2050 *et seq.*)

20 I, Len Racioppi, declare:

21 1. I am the Project Development Manager for ExxonMobil Environmental Services
22 Company, which is an affiliated company providing environmental services to ExxonMobil Oil
23 Corporation, Petitioner ("ExxonMobil"). The following facts are within my personal knowledge
24 and, if called to testify to the matters stated herein, I could and would competently do so.

25 2. There will be substantial harm to ExxonMobil if a stay is not granted. Since the
26 State Board has up to 90 days to review an action upon a petition, ExxonMobil will suffer
27 substantial harm by having to expend resources to develop work plans and implement work for
28 which it has no liability. Specifically, ExxonMobil will be required to (1) conduct indoor air
sampling and risk assessment at two on-site buildings and one off-site building during the winter

1 of 2016-2017, (2) prepare an additional site assessment work plan by January 30, 2017, and (3)
2 submit public participation information (technical report) by February 15, 2017. Each of these
3 would need to be completed before the State Board is required to act on ExxonMobil's petition.
4 A preliminary estimate by ExxonMobil's environmental consultant, Cardno, indicates that,
5 completing the work in the Requirement for Submittal of Technical Reports could cost up to
6 \$50,000.

7 3. There will be no substantial harm to other interested persons or to the public if the
8 requested stay is granted. The length of time that has passed between each of the Regional
9 Board's efforts with regard to the Jalk Fee property demonstrates that the Board does not view
10 this site as presenting near-term risks. For example, ExxonMobil submitted a report to the
11 Regional Board in March 2015 requesting that it be relieved of responsibility under the Regional
12 Board's California Water Code section 13267 order and that Continental Heat Treating be made
13 the discharger of record for the Jalk Fee property.¹ The Regional Board responded to that report
14 in July 2016.² ExxonMobil acknowledges that the issues of identifying the appropriate discharger
15 for Jalk Fee have been in dispute during this time period and that the Regional Board and
16 ExxonMobil have both been working in good faith to resolve the relevant question of
17 responsibility for chlorinated solvents during the time in question and not seeking delay.
18 ExxonMobil believes that by granting a stay and undertaking review of its petition, the process
19 will result in only a short delay that will not harm interested persons or the public, but will allow
20 the fair resolution of the question of which party is the appropriate discharger who should be
21 asked to address chlorinated solvents at the Jalk Fee property.

22 4. As detailed in the Petition for Review and Request for Hearing and Stay, filed
23 concurrently with this declaration, there are substantial questions of law and fact regarding the
24 Regional Board's issuance of the Requirement for Submittal of Technical Reports to ExxonMobil
25 that justify the issuance of a stay.

27 ¹ See Cardno's Request to Name Continent Heat Treating as Discharger, Former ExxonMobil Jalk Fee Property
(March 25, 2015).

28 ² See Letter to Ms. Marla Madden from LA-RWQCB, Response to "Request to Name Continental Heat Treating as
Discharger" (July 22, 2016).

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

Executed this 19th day of December, 2016 in Houston, Texas



LEN RACIOPPI

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PROOF OF SERVICE

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- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.
- by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- by transmitting via e-mail or other electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

By Email

State Water Resources Control Board
waterqualitypetitions@waterboards.ca.gov

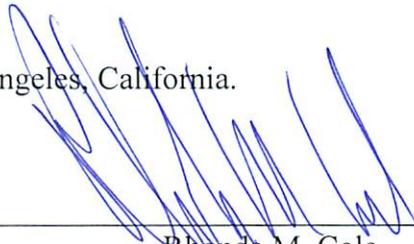
By Email and U.S. Mail

Samuel Unger, Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Samuel.Unger@waterboards.ca.gov

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Rhonda M. Cole

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