APPENDIX D

EXAMPLES OF
"NO FURTHER ACTION"

LETTERS

LIFORNIA REGIONAL WATER QUALITY CONTROL BOARD S ANGELES REGION

CENTRE PLAZA DRIVE MONTEREY PARK, CA 91754-2156 (213) 266-7500 FAX: (213) 266-7600



April 10, 1995

Ms. Kathy Emerson Chevron Chemical Company Environmental & Health Protection 6001 Bollinger Canyon Road San Ramon, CA 94583

REMEDIATION CLOSURE, H. KRAMER AND COMPANY SITE, EL SEGUNDO (CAO ORDER NO. 92-094, FILE NO. 92-57)

You indicated in our telephone conversation on March 21, 1995, that the cap work has been completed at the site in accordance with your engineering design at the subject site.

On March 29, 1995, staff performed a final inspection of the cap and the remediation activities for the slag material at the site.

Based upon this and all previous inspection, we have determined that the remediation has been successfully completed in accordance with the approved cap design and this Water Board's requirements. Therefore, we have determined that no further action will be required for soil and slag remediation at the site. Please provide a summary report along with all sampling and testing results and as-built drawings to us on or before May 15, 1995.

Also, we will require proof that a "Deed Restriction" has been put in place, which clearly delineates this cap location, and which provides public notice that no penetration or disruption of the cap may occur without the prior written approval of this Board.

Order No. 92-094, prescribes certain requirements pertaining to post-closure maintenance of the cap and groundwater monitoring.

To that end, the cap shall be maintained in accordance with the maintenance plan approved by the Board on August 15, 1994. Please provide the name of the party who has the financial responsibilities for performing the proposed cap and pavement maintenance and rehabilitation long term.

In addition, groundwater monitoring shall be performed for three consecutive years and the results submitted to us for review in accordance with the workplan approved by the Board on March 2, 1995.

Ms. Kathy Emerson Page 2

If you have any questions, please call David Hung at 213/266-7611.

J. E. ROSS, P.E. Chief, Site Cleanup Unit

Lisa Neilson, USEPA, Region 9 Steve Trumura, El Segundo Fire Department Bill O'Brien, H. Kramer & Company Linda Sutton

Michael Brill, Alschler, Grossman & Pines

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD 1 3 ANGELES REGION

CENTRE PLAZA DRIVE STEREY PARK, CA 91754-2156 266-7500 FAX: (213) 266-7600

April 24, 1996

Mr. John C. Moore TELEDYNE ANALYTICAL INSTRUMENTS 16830 Chestnut street City of Industry, CA 91749

SAN GABRIEL VALLEY CLEANUP PROGRAM - NO FURTHER REQUIREMENTS, TELEDYNE ANALYTICAL INSTRUMENTS, 16830 CHESTNUT STREET, CITY OF INDUSTRY, CALIFORNIA (FILE NO. 105.0275)

We are in receipt of the report entitled "Results of Soil Gas Investigation", received on February 13, 1996, submitted on your behalf by your consultant, PES ENVIRONMENTAL, INC. The subject report details the results of a recent soil gas survey at the subject site. This submission is in general compliance with requirements in our letters of October 25, 1995, and December 8, 1995. Upon review of the subject report, we have the following comments:

- A total of 51, mostly shallow soil vapor samples were collected from soil vapor probes installed to depths ranging from 5' to 15' below ground surface (bgs) in seven potential source areas during this phase of assessment.
- 2. Maximum VOC concentrations were 28 µg/l PCE, 2 µg/l 1,1,1-TCA, 6 µg/l 1,1-DCE, and 3 µg/l TCE detected in shallow samples from the interior of the building and dumpster area. All deeper samples contained only traces of volatile organic compounds (VOCs) or were non-detect (ND). Ground water is estimated to be approximately 20' bgs in the site area.

PREVIOUS ASSESSMENT

Since 1981, the subject site has been occupied by a manufacturer of precision measurement and control instruments. A vapor degreaser, that used 1,1,1-TCA, was operated at the site to clean printed circuit boards before 1989. During the period of July 1988 through September 1989, a total of twenty-three soil matrix samples were collected from eight boreholes drilled to a maximum depth of 20' bgs over several areas of the facility. Maximum concentrations of VOCs detected were 26 µg/kg of PCE and 36 µg/kg of methylene chloride. On April 9, 1993, a self-directed soil gas survey was conducted over several areas of the subject facility. The highest concentrations of VOCs detected from vapor probes ,installed to a maximum depth of 15' bgs, were 84.3 µg/l of PCE and 3.1 µg/l of 1,1-DCE at the vapor degreaser area at a depth of 5' bgs.

Based on the results of the subject report and previous information



John C. Moore Page 2

contained in our files, Board staff have determined that assessment is complete and we therefore have no further requirements with respect to the objectives of the San Gabriel Valley Cleanup Program at this site. According to Regional Board guidelines included in the "Interim Site Assessment and Cleanup Guidebook," February 1995 edition, the concentrations of VOCs detected at your facility do not represent a threat to ground water quality. If you have any questions, please contact Julio C. Lara at (213)266-7541 and address all correspondence to his attention.

Arthur G. Heath, Ph.D.

Environmental Specialist IV

cc: Phillip Ramsey, U.S. EPA, Region IX, San Francisco Dennis Dickerson, Cal-EPA, DTSC, Region 3 Carol Williams, San Gabriel Valley Watermaster James L. Jasperse, PES Environmental, Inc.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

ONTEREY PARK, CA 91754-2156 266-7500 Fa... (213) 266-7600



June 12, 1995

Mr. Richard Dulmage Wheaton Plastics Containers 2568 Channel Drive Ventura, CA 93003

Dear Mr. Dulmage:

UNDERGROUND STORAGE TANK CASE CLOSURE WHEATON PLASTIC CONTAINERS 2568 CHANNEL DRIVE, VENTURA (ID #930300361)

This letter confirms the completion of the site investigation for the underground storage tank formerly located at the above-described location.

Based on the available information and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the underground storage tank release is required.

This notice is issued pursuant to a regulation contained in Title 23, California Code of Regulations, Division 3, Chapter 16, Section 2721(e).

Please contact Dr. Nancy Adin at (213) 266-7676, if you have any questions concerning this matter.

Sincerely,

ROBERT P. GHIRELLI, D.Env.

Robert P. Huielli

Executive Officer

cc: Mr. Jorge Leon, State Water Resources Control Board, Office of Chief Counsel

Mr. Douglas Beach, Ventura County Environmental Health Division

Mr. Ricahard Botke, PW Environmental

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

101 CENTRE PLAZA DRIVE MONTEREY PARK, CA 91754-2156 (213) 266-7500 FAX: (213) 266-7600

April 27, 1995

Mr. Fred Burnett Department of General Services City of Los Angeles 215 West 6th Streeet, Suite 1101 Los Angeles, CA 90014-1830

SOIL CLOSURE AND GROUNDWATER MONITORING LOS ANGELES CITY FIRE STATION #56 2759 ROWENA STREET, LOS ANGELES (ID #900390125)

We have reviewed the information contained in our file for the subject case. Based on our review of the information submitted, no further soil cleanup will be required at this time.

Because the groundwater quality data which we have in our files is more than six years old, you must collect and analyze one water sample from each onsite groundwater monitoring well before we can determine if further action is necessary. Prior to collecting samples, the depth to water must be measured, then the wells must be properly purged until the temperature, conductivity, and pH stabilize, and the water is free of suspended and settleable matter. The samples are to be analyzed for total petroleum hydrocarbons as gasoline and diesel using EPA method 8015 and aromatic hydrocarbons, using EPA method 8020. All analytical data are to be reported as shown in the enclosed laboratory report

The report on this work is due by May 25, 1995. The report must include the analytical results, an isoconcentration map showing total aromatic hydrocarbons, the current groundwater elevation data, and a groundwater contour map based on those data. The report must also contain the measurements recorded during the purging of the well and the disposal point of the purged water.

If you have any questions concerning this matter, please call Dr. Nancy Adin at (213) 266-7676.

ALBERT E. NOVAK

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Environmental Specialist IV

Enclosure

cc: w/o enclosure:

Captain Jim Digrado, Los Angeles City Fire Department, Underground Tanks Law/Crandall & Associates



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

1F TENTRE PLAZA DRIVE : .EREY PARK, CA 91754-2156 266-7500 (213) 266-7600



April 25, 1996

Mr. Ray Navarro CACIQUE, INC. 14940 Proctor Avenue City of Industry, CA 91745

SAN GABRIEL VALLEY CLEANUP PROGRAM - NO FURTHER ACTION, CACIQUE, INC. 14940 PROCTOR AVENUE, CITY OF INDUSTRY (FILE NO. 102.0184)

Since 1985, the subject site has been occupied by a food processing plant. Before 1985, the site was operated by a meat processing company. Reportedly no vapor degreaser was used on site. Upon review of records from the Los Angeles County Fire Department (LACFD), the City of Industry Building and Safety Department (CIBSD), and our file for the subject site, Board staff have the following comments:

- A site inspection conducted by Board staff on October 17, 1990, confirmed the use of cleaning or sanitizing solutions, caustic soda, chlorine compounds, sulfuric acid, iodine, and ammonia. The use of chlorinated volatile organic compounds (VOCs) was not noted or declared.
- 2. Three underground storage tanks (UST) were removed during 1990 under the direction of Los Angeles County Department of Public Works (LACDPW). No significant impact to subsurface soil or ground water was encountered in the UST area and site closure was granted by the LACDPW in a letter dated July 18, 1990.
- 3. A 500-gallon waste oil UST was removed from the site on January 2, 1991. Analysis of soil matrix samples collected from the excavation resulted in the detection of maximum TPH concentrations of 1,950 mg/kg and chloroform of 30 µg/kg. To verify these results, on July 23, 1991, three soil matrix samples were collected from one borehole drilled to the maximum depth of 10' below the former tank invert which is approximately 18.5' below ground surface (bgs). No TPH or VOCs were detected in these samples.

Ray Navarro Page 2

Based on the information contained in the file, and after inspecting the site on March 20, 1996, Board staff have determined that no further action is required with respect to the San Gabriel Valley Cleanup Program at this site. If you have any questions, please contact Julio C. Lara at (213) 266-7541.

Arthur G. Heath, Ph.D.

Environmental Specialist IV

cc: Phillip Ramsey, U.S. EPA, Region IX, San Francisco
Dennis Dickerson, Cal-EPA, DTSC, Region 3
Carol Williams, San Gabriel Valley Watermaster
Carl Sjoberg, County of L.A., D.P.W., Industrial Waste Section
George Salmas, Attorney At Law, Los Angeles, CA
Kirk Thomson, Environmental Support Technologies, Inc.

ALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD OS ANGELES REGION

1 CENTRE PLAZA DRIVE MONTEREY PARK, CA 91754-2156 (213) 266-7500 FAX: (213) 266-7600



October 16, 1995

Fred Tindall MOORE BUSINESS FORMS 2275 Commerce Dr. Fremont, OH 43420

WELL INVESTIGATION PROGRAM - NO FURTHER REQUIREMENT, FORMER MOORE BUSINESS FORMS FACILITY, 3730 CAPITAL AVE. CITY OF INDUSTRY (FILE I-10116)

Regional Board staff have received the documents contained in the former Los Angeles County Department of Public Works (LACDPW) LOP file concerning former underground petroleum storage tanks (USTs) at the subject site. Upon review of the subject file and other information, we have the following comments:

- According to the information contained in the subject file, two USTs (one 5,000 gallon gasoline tank and one 10,000 gallon diesel tank) were installed at the subject facility in 1968, and removed in 1985.
- 2. In March 1991, 3 boreholes were drilled to a maximum depth of 35' bgs in the UST area to determine if soil beneath the subject site was contaminated as a result of releases from the former USTs and associated piping. Analysis (in accordance with EPA Methods 418.1 for total recoverable petroleum hydrocarbons/TRPH and 8020 for BTEX) of soil matrix samples from these boreholes detected concentrations of 3,035 mg/kg TRPH (in a sample collected at 10' bgs); 43 mg/kg TRPH (in a sample collected at 30' bgs); and 0.021 mg/kg xylenes (in a sample from 10' bgs). No other compound was above detection limits in any of the other soil matrix samples.
- On November 4, 1991, the LACDPW required, and subsequently approved a work plan to remediate the contaminated soil associated with the former USTs.
- 4. Excavation and hauling of approximately 550 cubic yards of predominantly diesel contaminated soil associated with the USTs commenced in January 1992. Laboratory results of confirmation soil samples collected in the bottom and sidewalls of the final excavation pit were ND for fuels.

Based on the results of the assessment work conducted at the subject facility, Board staff have determined that assessment and remediation have been completed and we therefore have no further requirements with respect to the former USTs at the site. A "no further requirements" letter for VOCs at the site was issues by

Board staff on August 8, 1995. The remaining TRPH soil contamination detected at 30' bgs in one of the boreholes does not represent a significant continuing threat to ground water quality, human or environmental health and therefore does not require cleanup. Considering the ND results analysis of confirmation soil matrix samples in the excavation pit, and therefore unlikelihood of ground water contamination associated with the USTs, we do not require the installation of ground water monitoring wells.

If you have any questions, please contact me at (213) 266-7531.

ERIC NUPEN, R.G.

Senior Engineering Geologist

cc: Jorge A. Leon, OCC, Sacramento Norman Dupont, (attorney for Moore Business Forms) Phillip Ramsey, USEPA, Region IX Steven Anderson, Erickson Inc., Richmond, CA Richard Montevideo, Rutan & Tucker, Costa Mesa, CA



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD 3 ANGELES REGION

CENTRE PLAZA DRIVE STEREY PARK, CA 91754-2156 (213) 266-7500 FAX: (213) 266-7600

October 10, 1995

Matthew A. Love EXIDE CORPORATION 645 Penn Street Reading, PA 19601

WELL INVESTIGATION PROGRAM - NO FURTHER REQUIREMENTS, FORMER EXIDE CORPORATION FACILITY, 13110 LOUDEN LANE, CITY OF INDUSTRY CA (FILE No. 102.7209)

Board staff have received the "Second Round Semi-Annual Groundwater Monitoring Report", prepared by your consultant Dames & Moore, dated May 24, 1995 (received May 25, 1995). The report contains the results of biannual ground water sampling from the 3 on-site monitoring wells and is in general compliance with requirements stated in our letter of September 14, 1994. Upon review of the subject report, previous assessment work and other information, Board staff have the following comments:

- 1. Previous assessment work conducted at the subject facility included the removal of 7 sulfate solution underground storage tanks (USTs), and cleanup of associated sulfate contaminated soil, and on-site abandonment of 1 UST. A portion of the sulfate contaminated soil was left in place with the associated UST due to accessibility difficulties. This site was transferred from the County due to potential ground water impact from the leaking sulfate USTs. No potential sources of VOCs were identified on site.
- 2. A total of 7 ground water sampling events have been conducted at the subject facility. Most of the ground water samples contained concentrations of sulfate concentration below the RWQCB Basin Plan water quality objective of 300 mg/l and EPA's maximum contaminant level of 250 mg/l, except for a sample collected from MW-2 which reported a sulfate concentration of 350 mg/l. The average maximum sulfate concentration in ground water samples from the downgradient wells was 231 mg/l. The average from the upgradient wells was 130 mg/l.

Based on the results of the subject report and previous investigations, Board staff have determine that soil and ground water assessment and remediation have been completed where feasible and therefore we have no further requirements with regard to the objectives of the well investigation program. The continued ground water contamination from on-site sources evidenced by the monitoring data is apparently due to either incidental on-site surficial spills or leachate from the sulfate soil contamination that was abandoned in place with the remaining UST. Board staff



Matthew A. Love Page 2

recommends that you attempt to control on-site surficial spills and continue periodic ground water sampling until sulfate levels decline. Although Board staff concur that soil remediation in the UST 7 area is unfeasible due to accessibility at this time, the remaining sulfate contaminated soil should be cleaned up if the building is removed from the affected area to prevent human and environmental exposure, and restore the full beneficial uses of the subject property.

The jurisdiction requirements of other agencies, such as the U.S. Environmental Protection Agency (USEPA), are not affected by the Board's "no further requirements" determination. Such agencies may choose to make their own determination concerning the site.

If you have any questions, please contact Walter Salas at (213) 266-7542 and address all correspondence to his attention.

Eric Nupen, R.G.

Senior Engineering Geologist

cc: Phillip Ramsey, USEPA, Region IX
Dennis Dickerson, Cal-EPA, DTSC, Region 3
Carol Williams, San Gabriel Valley Watermaster
William McConnell, property owner
Karen J. Kinsella, Dames & Moore, Santa Ana
Steven Jl Oppenheimer, Morgan, Lewis & Bockius

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD ANGELES REGION

CENTRE PLAZA DRIVE TEREY PARK, CA 91754-2156 (213) 266-7500 FAX: (213) 266-7600



November 15, 1995

Alex Neria Valley Brass Co. 3141 Maxson Road South El Monte, CA 91733

WELL INVESTIGATION PROGRAM - NO FURTHER REQUIREMENTS, VALLEY BRASS CO., 3141 MAXSON ROAD, SOUTH EL MONTE, CA (File No. 107.0386)

Upon review of our files, we have the following comments regarding the objectives of the Well Investigation Program for the subject site:

- Valley Brass, Inc. has operated a brass foundry at the subject site since 1946. Kerosene, hydraulic oil, petroleum, grease, and gasoline were among chemicals used at this facility that may have contaminated the soil and ground water.
- 2. An inspection by Board staff on September 3, 1987, identified the following areas of concern: 1) a drum storage area in the northwest corner of the site; 2) two underground storage tanks (USTs) in the front parking lot area; 3) an oil storage area in the southern part of the site; and 4) a hazardous material storage area in the southern part of the site.
- 3. Two USTs were removed in August, 1987, in accordance with the Los Angeles County Department of Public Work requirements. No evidence of leaks from the USTs and associated piping were detected by confirmatory soil sampling and the inspectors observations.
- 4. An initial soil investigation was performed in December, 1987, under Board staff oversight which consisted of one 25-foot soil boring in the fuel drum storage area. Methylene chloride (1,500 ug/kg), PCE (1,100), toluene (170), and TPH (32,200 mg/kg) were detected to a depth of one foot below ground surface (bgs). TPH (35 mg/kg) was also detected in a sample collected at 5' bgs. Ground water is estimated to be approximately 45' bgs in this area.
- 5. Contaminated soil was excavated and hauled from the former drum storage area in June, 1988. Laboratory analysis of soil matrix samples from a confirmatory borehole drilled to a depth of 30' bgs were non-detect (ND) for BTEX, TPH, and Volatile organic compounds (VOCs).

Mr. Alex Neria Page 2

- 6. An additional soil investigation was performed in May, 1990, consisting of 10 boreholes to a maximum depth of 10' bgs in the hazardous material and fuel drum storage areas. No VOCs or TPH were detected in samples from these borings.
- 7. Additional subsurface investigations performed in February, 1991, consisted of 9 boreholes in the oil and hazardous material storage areas. No VOCs were detected in these samples. Samples from one borehole in the hazardous material storage area contained a maximum TPH concentration of 1,400 mg/kg. Samples collected in the other borings in the area contained no greater than 100 mg/kg TPH.

Based on the above information, Board staff concludes that the assessment work performed at the site adequately evaluate subsurface conditions beneath the site and we therefore have no further requirements regarding assessment. The remaining TPH soil contamination in the hazardous material storage area marginally exceeds allowable levels. However, considering the limited volume of soil and depth to ground water, we do not believe that this is a significant threat to human or environmental health, or to ground water quality, and therefore remediation is not required.

The jurisdiction requirements of other agencies, such as the United States Environmental Protection Agency, are not affected by this Board's "no further requirement" decision. Such agencies may choose to make their own decisions concerning soil and groundwater investigations at the region.

If you have any questions, please contact Mr. Yi Lu at (213)266-7642.

Eric Nupen, RG

Senior Engineering Geologist

cc: Bella Dizon, U.S. EPA, Region IX

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

CENTRE PLAZA DRIVE ITEREY PARK, CA 91754-2156) 266-7500 (213) 266-7600



December 21, 1995

Phil Ramser, Sr. RAMSER PROPERTIES 151 Kalmus Dr., Suite D 220 Costa Mesa, CA 92626

WELL INVESTIGATION PROGRAM - NO FURTHER REQUIREMENTS, RAMSER PROPERTIES SITE AT 18525 RAILROAD STREET, CITY OF INDUSTRY, CALIFORNIA (FILE NO. 105.0234).

We are in receipt of the report entitled "Supplemental Soil Gas Survey to Reassess Vadose Zone Site Conditions and Evaluate Water Ouality Findings", received November 16, 1995, submitted by your consultant, The Kendall/Adams Group. The subject report details the collection and analysis of soil vapor samples potential VOC sources at the facility. The subject soil gas survey was implemented to complement previous assessment work and is in general compliance with requirements in our letters of February 4, 1995, and May 15, 1995. Upon review of the subject report, we have the following comments:

- 1. A total of 46 soil vapor samples were collected from soil vapor probes installed to a maximum depth of 15' bgs in potential source areas on the site during this phase of assessment. Maximum VOC concentrations were 1 μ g/l PCE; 16 μ g/l TCE; and 79 μ g/l Freon 11.
- 2. These results correlate with data from a subsurface investigation conducted in October 1991. Laboratory analysis of shallow soil gas samples collected during this earlier phase of assessment resulted in maximum VOC concentrations of 56 μ g/l PCE; 15 μ g/l TCE; 128 μ g/l 1.1.1-TCA; 1 μ g/l 1.1-DCE; and 372 μ g/l Freon 113; and 1 μ g/l methylene chloride. Deeper soil vapor samples collected during the subject soil gas survey confirmed that the higher concentrations detected during the earlier assessment did not extend below 10' bgs.
- 3. Other previous assessment work at the subject site included passive soil sampler (using petrex tubes), drilling and sampling of 9 boreholes, collection and analysis of 57 soil vapor samples, and installation/sampling of three ground water monitoring wells. Maximum VOC concentrations in soil matrix samples were 43 μ g/kg PCE; 8 μ g/kg TCE; 45,000 μ g/kg methylene chloride (at 1' bgs); and 167 μ g/kg toluene. Deeper soil vapor samples collected during the subject soil gas survey confirmed that the higher concentrations detected during the

earlier assessment did not extend below 10' bgs.

- 4. Laboratory results of the latest ground water sampling and analysis indicate a reduction in concentrations of VOCs in ground water since monitoring began in June 1993. The highest VOC concentrations in the ground water samples were TCE at 59 μg/l; 1.1-DCE at 6 μg/l; and trichlorofluoromethane at 42 μg/l. In general, the highest concentrations of contaminants were detected in ground water samples from downgradient well MW-3. Ground water is approximately 18' bgs.
- 5. The subject site has been used for the manufacture of polyurethane foam products since 1977. Potential sources of soil and ground water contamination included above ground storage tanks, process areas and numerous chemicals storage areas. The soil is predominantly clayey silts with interbedded silts, sands and gravels.

Based on the results of the subject reports and previous information contained our files, Board staff have determined that the data obtained at the site adequately evaluate subsurface conditions and we therefore have no further requirements with respect to the Well Investigation Program. Although VOCs that were detected in shallow soil matrix and vapor samples exceed allowable limits, the limited volumetric extent of the impacted soil and clayey nature of the soil limits the risk to human or environmental health, or ground water quality, and therefore remediation is not required.

The jurisdictional requirements of other agencies, such as the U.S. Environmental Protection Agency (USEPA), are not affected by the Board's "no further action" determination. Such agencies may choose to make their own determination concerning the site.

If you have any questions, please contact Julio C. Lara at (213) 266-7541.

ERIC NUPEN, R.G.

Senior Engineering Geologist

CC: Phillip Ramsey, U.S. EPA, Region IX, San Francisco Dennis Dickerson, Cal-EPA, DTSC, Region 3 Carol Williams, San Gabriel Valley Watermaster Charles C. Kendall, Kendall/Adams Group

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

101 CENTRE PLAZA DRIVE MONTEREY PARK, CA 91754-2156 (213) 266-7500 FAX: (213) 266-7600

January 4, 1996

Eric Henn HENNS INVESTMENT c/o Edro Engineering, Inc. 20500 Carrey Rd. Walnut, CA 91789

WELL INVESTIGATION PROGRAM - NO FURTHER REQUIREMENTS, INVESTMENT (FORMER BECKER MANUFACTURING, INC.), 215 N. MASON WAY, CITY OF INDUSTRY (FILE NO. 102.0052)

At the request of your consultant, FERRO ENGINEERING, we have reconsidered our requirement for a hydrogeologic investigation at the subject site which was noted in our letter of September 21, 1995. The purpose of this requirement was to determine if a ground water plume was associated with on-site sources that needed cleanup to prevent further degradation of ground water quality. As noted in our letter, considering the extent of VOC soil contamination from ground surface to the water table, we believe that it is likely that ground water has been impacted as a result of releases from on-site sources. Although the levels of reported soil contamination were not high enough to indicate a likelihood of severe ground water contamination, we thought a confirmatory hydrogeologic investigation was justified due to the possibility that higher concentrations were present before the suspected preliminary cleanup that may have been conducted without Board staff knowledge or oversight in the most heavily contaminated portion of the site.

Upon review of data from the subject site and ground water data from adjacent sites, we have decided to rescind our requirement for a hydrogeologic investigation at the site. Although it is likely that ground water quality has been impacted as a result of releases from on-site sources, it is unlikely that the contamination is of such magnitude to require cleanup and does not warrant the cost of a hydrogeologic investigation. We therefore have no further requirements for assessment or remediation at the site.

The jurisdiction requirements of other agencies, such as the U.S. Environmental Protection Agency (USEPA), are not affected by the Board's "no further requirements" determination. Such agencies may choose to make their own determination concerning the site.





Eric Henn Page 2

If you have any questions, please contact the undersigned at (213) 266-7531 and direct all correspondence to his attention.

Eric Nupen, R.G. Senior Engineering Geologist

cc: Phillip Ramsey, U.S. EPA, Region IX, San Francisco Dennis Dickerson, Cal-EPA, DTSC, Region 3 Carol Williams, San Gabriel Valley Watermaster Carl Sjoberg, County of L.A., D.P.W., Industrial Waste Section Paul Mitchell, Fero Engineering