



FERO ENGINEERING

ENVIRONMENTAL ENGINEERING & CONSULTING

January 3, 2005

Mr. Erik Rodriguez
County Los Angeles
Department of Public Works
Environmental Programs Division
Post Office Box 1460
Alhambra, California 91802-1460

Via Telecopier

Modified Site Assessment Work Plan
Closure Permit Number: A397722, File No. 014533-037714
Industry Pacific, Inc.
14710 Nelson Avenue, City of Industry, California 91744

Pursuant to the County of Los Angeles Department of Public Works (LADPW) letter dated October 26, 2004 and our telephone conversations this morning, Fero Environmental Engineering, Inc. (Fero) submits this modified site assessment work plan for the referenced site on behalf of the subject site owner; Industry Pacific, Inc., P.O. Box 92650, City of Industry, California 91715. This workplan supersedes Fero's, Site Assessment Work Plan dated December 16, 2004.

BACKGROUND

On January 29, 2004, under Closure Permit Registration Number 397722 and in accordance with the County of Los Angeles Fire Department requirements, one 6,000 gallon fiberglass underground gasoline tank and one 6,000 gallon fiberglass underground diesel tank located at 14710 Nelson Avenue in the City of Industry were removed and properly disposed. Details regarding the underground storage tank removals were included in the previously submitted Tank Closure Report dated February 17, 2004.

On January 29, 2004, upon removal of the referenced tanks, one soil sample (2B) was collected from three feet below the invert elevation of the north end of the diesel tank, one soil sample (2A) was collected from three feet below the invert elevation of the south end of the diesel tank, one soil sample (1B) was collected from three feet below the invert elevation of the south end of the gasoline tank, one soil sample (1A) was collected from three feet below the invert elevation of the north end of the gasoline tank, one soil sample (2C) was collected from two feet below the invert elevation of the diesel dispenser and one soil sample (SP1) was collected from east end of the soil stock pile. The gasoline dispenser was located over the south end of the diesel tank and formerly about four feet of lateral piping ran from the diesel tank south to the diesel dispenser location, therefore no additional

samples were required or obtained. A scaled site plan, which shows the locations of the tanks, dispenser and the sampling points, is enclosed as Figure 1.

All soil samples obtained were tested for Total Petroleum Hydrocarbons (TPH) as diesel and as gasoline using EPA Method 8015m, for Benzene, Toluene, Ethylbenzene, Xylenes (BTEX), Methyl tert-Butyl Ether (MTBE), Ethyl tert-Butyl Ether (ETBE), Isopropyl Ether (DIPE), Tert-Amyl Methyl Ether (TAME) and Tertiary Butyl Alcohol (TBA) using EPA Method 8260B. Analytical results from the testing are summarized in Table 1 below. Complete analytical results and chain of custody documentation for the above-mentioned samples were included in the above referenced closure report.

Table 1
Soil Analytical Results
Former Underground Diesel and Gasoline Tank
Industry Pacific, Inc.

14710 Nelson Avenue, City of Industry, California 91744

Sample Point	TPHd	TPHg	Benzene	Toluene	Ethyl-Benzene	Xylene	MTBE	ETBE	DIPE	TAME	TBA
	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)	(mg/Kg)
Soil Screening Level	1,000	500	0.039	2.4	8.6	24	0.172	---	---	---	0.158
1A (N. end Gas UST)	ND	0.192	ND	ND	ND	ND	ND	ND	ND	ND	ND
1B (S. end Gas UST)	ND	0.535	0.017	0.047	ND	0.014	0.103	ND	ND	ND	ND
2A (N. end Diesel UST)	ND	0.944	0.077	0.263	0.031	0.166	3.020	ND	ND	ND	0.201
2B (S. end Diesel UST)	ND	2.900	0.142	0.399	0.050	0.242	4.000	ND	ND	ND	0.673
2C (Diesel Dispenser)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Stock Pile	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

ND = Not Detected at laboratory detection limits. MTBE=Methyl tert-Butyl Ether, ETBE=Ethyl tert-Butyl Ether, DIPE=Isopropyl Ether, TAME=Tert-Amyl Methyl Ether, TBA=Tertiary Butyl Alcohol. Values in bold exceed their respective Soil Screening Level (SSL).

The tank excavation was backfilled with the clean stockpiled soils, which were supplemented with clean import soils. The soils were placed in the excavation and compacted and the tank area was resurfaced with asphalt.

REGIONAL & SITE GEOLOGY

The project site is located in the Transverse Ranges Province. Most of the province is mountainous; many of the higher ridges and peaks rise above 5,000 feet, and the highest mountains rise to elevations of more than 10,000 feet. The backbone of the province, in its central and eastern parts, is formed by the San Gabriel and San Bernardino Mountains. The Province extends eastward about 275 miles from Point Arguello into the Mojave Desert. The site is more specifically located in the southeastern San Gabriel Valley. (1, 2) During the process of excavating soils to obtain the tank invert sample, native soils were observed to consist generally of silty fine to medium sands (SM).

GROUNDWATER

To determine the depth to groundwater in the vicinity of the study site, Fero accessed the files of the Hydraulics Section of the Los Angeles County Department of Public Works (DPW). Well No. 3036 is located approximately 1/4 mile north of the study site. The most recent monitoring data from this well indicated a depth to water of 101 feet on November 17, 2003. (3)

DISCUSSION OF RESULTS

As indicated above in Table 1, no diesel related Total Petroleum Hydrocarbons were found in any of the soil samples. Total Petroleum Hydrocarbons as gasoline (TPHg), Benzene, Toluene, Ethylbenzene, Xylenes (BTEX), Methyl tert-Butyl Ether (MTBE) and Tertiary Butyl Alcohol (TBA) were detected in the soil samples from below the diesel tank. Total Petroleum Hydrocarbons as gasoline (TPHg), Benzene, Toluene, Xylenes and Methyl tert-Butyl Ether (MTBE) were detected in the soil sample from below the southern end of the gasoline tank. The samples from below the diesel dispenser and soil pile (tank overburden soils) were non-detect for all parameters analyzed.

Fero evaluated the potential for the TPHg, BTEX, MTBE and TBA identified in the soil to impact groundwater based on the most recent California Regional Water Quality Control Board (RWQCB)- Los Angeles Region, *Interim Site Assessment and Cleanup Guidebook, Volume 1: Assessment and Cleanup Guidance, Table 4-1; Maximum Soil Screening Levels (mg/Kg) for TPH and BTEX above Drinking Water Aquifers and Table 5-1; Average Attenuation Factor For Different Distances Above Ground Water and Lithology*, dated May 1996. This evaluation was based on a depth to groundwater of 80 feet (approximate depth from tank invert samples to groundwater) and a soil type of silty sand observed at the site. The maximum allowable concentration (soil screening level) of each of the identified compounds was determined and presented in Table 1. Concentrations of Benzene, MTBE and TBA exceed their respective soil screening level in both samples (2A and 2B) from below the eastern tank.

PROPOSED INVESTIGATIONS

Consistent with the referenced LADPW letter which requires assessment of the vertical and lateral extent of the identified organics and our telephone conversation of this morning, Fero Environmental Engineering, Inc. (Fero) will conduct seven exploratory borings to 40 fbg. Three borings will be conducted through the former tank pit proximate to former sampling locations 1B, 2A and 2B and four additional borings will be conducted around the former tank pit as indicated on Figure 1.

Fero will retain an appropriately certified and licensed drilling contractor (BC2 Environmental Corp. or equivalent) to conduct the borings. A copy of Fero's standard soil sampling protocol was included as Attachment A and Figure 1 indicates the proposed boring locations. A copy of the Health and Safety Plan is included in Attachment B. The boring will be conducted using a CME75 drill rig fitted with 8" diameter hollow stem augers. Soil sampling for analysis and lithologic logging will begin at

10 fbg and will continue every 5 feet to the terminus of each boring except in the former tank pit where the sampling will begin at 15 fbg which is below the previous pit bottom. The borings will be logged by a Fero geologist or engineer and will be visually classified in the field in accordance with the Unified Soil Classification System (USCS) or American Society for Testing and Materials (ASTM) including; moisture, consistency, texture, and soil characteristics.

All soil samples collected will be analyzed for TPHg and TPHd by EPA Method 8015m, BTEX, MTBE and fuel oxygenates by EPA Method 8260B. EPA Method 5035 soil sample collection and preservation guidelines will be utilized. Soil samples will be properly labeled, stored in a cooler at a temperature near 4° C, and delivered at the end of the day under proper chain of custody documentation to Enviro-Chem, Inc., a State of California certified laboratory. Soil cuttings from the boring operations will be retained onsite in properly labeled, DOT approved drums until laboratory results are available and proper treatment/disposal options for the soils are determined.

A report will be submitted to the LACDPW which describes the field operations and assessment techniques, presents the results, evaluates the potential risks associated with any gasoline constituents in the soil, and requests closure of the site as appropriate.

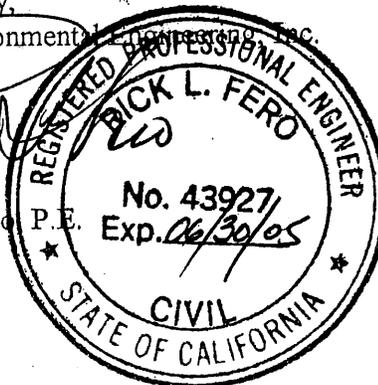
Should you have any questions regarding the content of this site assessment work plan, please do not hesitate to call the undersigned at (714) 256-2737.

Respectfully,

Fero Environmental Engineers, Inc.



Rick L. Fero P.E.
President



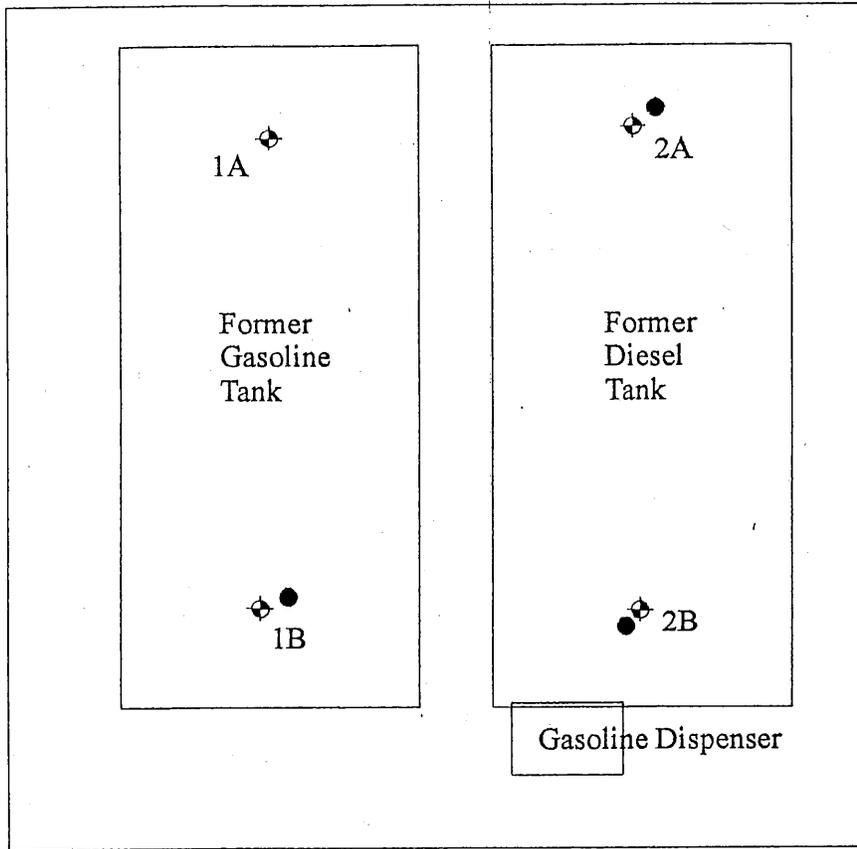
References

- 1) Geological Survey Professional Paper 420-A, 1965.
- 2) Geological Survey Professional Paper 1360, 1985.
- 3) Los Angeles County Department of Public Works, Hydrologic Records.

150' to NW corner
of property

1" = 5'

318' to top of curb @ Nelson Avenue



Gasoline Dispenser

◆ 2C Diesel Dispenser

Legend

- ◆ - Former Soil Sampling Locations
- - Proposed Soil Sampling Locations



FERO ENGINEERING
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**Soil Sampling Locations
Lane Stanton Vance
Lumber Company**

14710 Nelson Avenue
City of Industry, CA

Attachment A

Standard Soil Sampling Protocol

EXPLORATORY BORINGS & SOIL SAMPLING PROTOCOL

The following procedures are followed by Fero Engineering when performing exploratory borings and soil sampling utilizing a mobile drill rig equipped with hollow-stem augers, a direct push Geo-Probe rig or a three inch diameter hand operated stainless steel auger and drive sampler. The protocol directly follows or is excerpted from the California Regional Water Quality Control Board, Workplan Requirements for Initial Subsurface Engineering/Geologic Soil Investigation (Well Investigation Program), the State Water Resources Control Board, "LUFT" Field Manual, or the EPA document SW-846, Test Methods for Evaluating Solid Waste.

1. Borings shall be conducted to the desired sampling depth using either continuous flight, hollow-stem augers, direct push Geo-Probes or a three inch diameter hand operated stainless steel auger.
2. Discrete, relatively undisturbed soil samples shall be obtained using either a split spoon sampler which accommodates two to three sampling tubes or a hand operated drive sampler fitted with appropriate tubes:
 - Brass Tubes: 2 1/2 x 6 inches or 1 1/2 x 6 inches - for all organics, wet chemistry, physical, and metals analysis, excluding copper and zinc.
 - Stainless Steel Tubes: 2 1/2 x 6 inches or 1 1/2 x 6 inches - for all organics, wet chemistry, physical, and metals analysis, excluding chrome and nickel.
 - Plastic Tubes: 1 1/4 x 6 inches - for all organics, wet chemistry, physical, and metals analysis. Plastic tubes are for use with the Geo-Probe rig.
3. In loose soil, a sand trap is used with the hollow-stem auguring equipment to prevent soil from falling out of the sampler.
4. Upon termination, each boring shall be sealed from the bottom to grade with Bentonite grout using the tremie method as necessary.
5. The soil sampler is driven 12 to 18 inches at each sampling. Generally, the lowest sampling tube is retained for laboratory analysis. The other tubes are used either as back-up or for various analyses conducted in the field.
6. Each retained soil sample shall be secured with Teflon liners, tight fitting plastic caps, and black vinyl electrical tape. The samples shall be labeled, logged-in, and retained on-site in an ice chest containing Blue Ice or equivalent at or about 4 degrees Celsius until delivered to a State Department of Health Services certified laboratory for analysis. Samples shall be delivered to the laboratory on the same day or as soon after sampling as is practical. Undelivered samples shall be archived or stored in secure sample storage at or about 4 degrees Celsius.

7. Sample tube labels shall be marked in indelible ink with the following information:

- Job Number
- Sample Number
- Boring Number and Depth
- Sampling Date & Time
- Sampler's Initials
- Tests to be Performed (if known in the field)

8. All samples shall be delivered to the laboratory in compliance with chain-of-custody procedures, accompanied by appropriate chain-of-custody documentation which indicates times, dates, and persons-in-charge from the point of sampling to release at the laboratory.
9. All auger flights and Geo-Probe rods shall be steam cleaned and all hand augers shall be cleaned with a brush and Alconox or similar surfactant, rinsed in tap water, and final rinsed with deionized water prior to use and between borings.
10. Soil sampling tubes shall be cleaned with a brush and Alconox or similar surfactant, rinsed in tap water, final rinsed with deionized water, and delivered to the site in a sealed container to preclude contamination prior to use. Soiled sampling tubes may be reused on-site by following the previous cleaning procedures in the field.
11. Following removal of sampling tubes from the sampler, the sampler shall be completely disassembled and cleaned with a brush and Alconox or similar surfactant, rinsed in tap water, final rinsed with deionized water (if necessary) and reassembled with the appropriate number of clean tubes.
12. All borings shall be logged to provide characteristics of unconsolidated material per Unified Soil Classification System as well as all other appropriate information.
13. A California registered geologist or engineer or a certified engineering geologist with five years soils or Hydrogeologic experience shall direct or conduct the investigations and properly sign off the final report.
14. Soil cuttings and non-reusable drilling wastes shall be temporarily impounded on-site (observing applicable regulations related to waste storage) either in sealable labeled 55 gallon drums or in bulk storage in properly prepared areas, depending on the status of the site, and secured from random access. Custody of the drums, cuttings, and wastes shall remain with the client at all times.
15. Should analytical testing indicate the wastes constitute a "hazardous waste"; the client shall be so notified and advised of the lawful means of disposal or treatment of the wastes.

Attachment B

Health and Safety Plan