

 **ICF KAISER**
ENVIRONMENT & ENERGY GROUP

ICF Kaiser Engineers, Inc.
10 Universal City Plaza, Suite 2400
Universal City, CA 91608-1097
818/509-3100 Fax 818/509-3137

June 28, 1994

GAL⁷
RECEIVED
6-29-94

Ms. Shahin Nourishad
Los Angeles County Fire Department
Hazardous Material Control Program
5825 Rickenbacker Road
Commerce, CA 90040

SUBJECT: ADDENDUM TO REPORT ON THE TPH-AFFECTED SOIL REMEDIATION AND QUARTERLY GROUNDWATER MONITORING AT THE FORMER GRAHAM PRINTING & LITHOGRAPH FACILITY, 17475 GALE AVENUE, CITY OF INDUSTRY, CALIFORNIA

Dear Ms. Nourishad:

In response to your comments on the above-referenced report prepared by ICF Kaiser Engineers (ICF KE), the attached pages have the revisions indicated below:

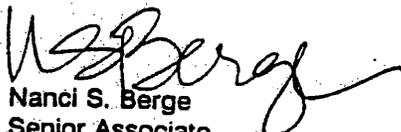
- Page 7, Section 3.1, first paragraph, last sentence: "Soil sample COMP 1 had previously found TRPH at the concentration of 180,000 ppm prior to remediation."
- Table 3 has additional notation: "Sample numbers MW-1-02 and MW-1 reference samples collected in sequential sampling rounds from monitoring well MW-1."

These pages replace the originals in the report. In addition, attached is a letter from Greg Gilroy of RREEF Funds, Inc. that describes and documents the disposition of waste from the site.

We appreciate the timely review of our report and look forward to receiving from the LACFD confirmation that the approved remediation was implemented and that there is no further action regarding TPH-affected soil necessary at this property. Please do not hesitate to call me directly at (818) 509-3192 should you have any questions regarding this matter.

Sincerely,

ICF Kaiser Engineers


Nanci S. Berge
Senior Associate

Attachments

cc: Greg Gilroy - RREEF
Gene Lucero - Latham & Watkins
Rick Kaumeyer - RWQCB
Angelo Bellomo - ICF KE
Tom Watson - ICF KE
Ruth Custance - ICF KE

The groundwater monitoring well was purged using a development rig outfitted with a stainless steel bailer. Three well volumes were purged. During the purge cycle, field measurement of pH, conductivity, and temperature, and visual observations were recorded on sampling data sheets to verify well stabilization. To collect a representative water sample, stabilization was deemed complete when three successive measurements of field parameters were within 10 percent.

A sample was collected for TRPH and VOC analysis using EPA Methods 418.1 and 502.2, respectively. The sample bottles were laboratory cleaned and prepared with appropriate preservatives. The sample was collected using a disposable, teflon bailer and was decanted through the bottom of the bailer through a sample port designed to minimize volatilization. The sample containers were labeled, capped tightly, enclosed in plastic bags and placed in a thermally insulated cooler chilled with ice until transportation to the laboratory. Appropriate chain-of-custody documentation accompanied the sample.

Nondisposable equipment used during sampling was decontaminated using an Alconox/water wash, double rinse, and distilled water rinse prior to use. The downhole equipment was steam cleaned prior to use. Purge water and decontamination water were containerized and labelled pending analysis for proper disposal by RREEF.

3.0 RESULTS

Analytical results for the soil and groundwater samples are presented in Tables 2 and 3, respectively. Laboratory data sheets are included as Attachment 1.

3.1 Soil Investigation

The confirmation sample, CS-1, was collected at approximately 1.5 feet bgs in the area of sample COMP1 previously collected by TTL. Analytical results indicate that VOCs were not detected in the sample above the stated detection limits. TRPH was detected in the sample at 300 ppm. Soil sample COMP1 had previously found TRPH at the concentration of 180,000 ppm prior to remediation.

Sample SB-11-5' had acetone and 2-butanone concentrations of 56 and 14 ppb, respectively. Other VOC analytes were not detected above stated detection limits. Additionally, VOCs were not present above stated detection limits in sample SB-12-5'. TRPH concentrations in SB-11-5' and SB-12-5' were 20 and 21 ppm, respectively.

3.2 Groundwater Investigation

Depth to groundwater in groundwater monitoring well MW-1 was measured to be 33.58 feet below the reference point marked on the top of the casing.

Table 3
RREEF
Summary of Analytical Results
Quarterly Groundwater Monitoring
May 25, 1994

Sample Number	MW-1-02*	MW-1*
Date Sampled	11-22-93	5-3-94
Total Recoverable Petroleum Hydrocarbons (ppm) EPA Method 418.1	ND	ND
Volatile Organic Compounds (ppb) EPA Method 502.2		
Benzene	ND	ND
Bromobenzene	ND	ND
Bromochloromethane	ND	ND
Bromodichloromethane	ND	ND
Bromoform	ND	ND
Bromomethane	ND	ND
n-Butylbenzene	ND	ND
sec-Butylbenzene	ND	ND
tert-Butylbenzene	ND	ND
Carbon tetrachloride	ND	ND
Chlorobenzene	ND	ND
Chloroethane	ND	ND
Chloroform	ND	ND
Chloromethane	ND	ND
2-Chlorotoluene	ND	ND
4-Chlorotoluene	ND	ND
Dibromochloromethane	ND	ND
1,2-Dibromo-3-chloropropane	ND	ND
1,2-Dibromoethane	ND	ND
Dibromomethane	ND	ND
1,2-Dichlorobenzene	ND	ND
1,3-Dichlorobenzene	ND	ND
1,4-Dichlorobenzene	ND	ND
Dichlorodifluoromethane	ND	ND
1,1-Dichloroethane	ND	ND
1,2-Dichloroethane	ND	ND
1,1-Dichloroethene	100	74
cis-1,2-Dichloroethene	ND	ND
trans-1,2-Dichloroethene	ND	ND
1,2-Dichloropropane	ND	ND
1,3-Dichloropropane	ND	ND
2,2-Dichloropropane	ND	ND
1,1-Dichloropropene	ND	ND
cis-1,3-Dichloropropene	ND	ND
trans-1,3-Dichloropropene	ND	ND
Ethylbenzene	ND	ND
Hexachlorobutadiene	ND	ND

ND - Not Detected
ppm - parts per million
ppb - parts per billion

* - Sample numbers MW-1-02 and MW-1 reference samples collected in sequential rounds from monitoring well 1

REEF
The RREEF Funds

June 27, 1994

Ms. Shahin Nourishad
LOS ANGELES COUNTY FIRE DEPARTMENT
Hazardous Material Control Program
5825 Rickenbacker Road
Commerce, California 90040

RE: DISPOSAL OF WASTES GENERATED DURING SOIL SAMPLING AND
GROUNDWATER MONITORING AT THE FORMER GRAHAM PRINTING &
LITHOGRAPH FACILITY, 17475 GALE AVENUE, CITY OF INDUSTRY,
CALIFORNIA

Dear Ms. Nourishad:

Enclosed please find copies of both the paid invoice and the manifest for the lawful disposal of waste material, which was removed from the above referenced site as a result of the sampling accomplished earlier this year. As you will note in the memorandum from Janet Holtz of A-Tech Environmental Consultants, our waste was combined with over 700 gallons of similar material and disposed of by Kal Vac under one single manifest.

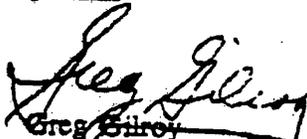
RREEF is finalizing the contract now for the lawful disposal of the waste material generated by the most recent sampling and remediation event. Said material will be disposed of within the next 30 days.

Should you have any questions or require additional information please feel free to contact either Tom Watson, ICF Kaiser Engineers at 818/509-3100 or me anytime.

Thank you for your continued cooperation in this matter.

Sincerely,

RREEF


Greg Gilroy
District Manager

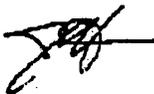
GG/ttb

1630 South Sunkist Street
Suite A
Anaheim, CA 92806
(714) 634-4664
FAX: No. (714) 634-2680

A TEC Associates, Inc.
Pacific Region
Newport Beach Office

MEMORANDUM

TO: Greg Gilroy/RREEF Funds

FROM: Janet Holtz/A TEC 

DATE: June 24, 1994

SUBJECT: 17475 Gale Avenue, City of Industry, CA

Greg, the following sequence of events reiterates the current status of the waste manifest for the above-referenced site:

On January 21, 1994, Jim Albright of ATEC oversaw Kal Vac, Inc. (a licensed hazardous waste hauler, EPA ID# CAD 980676720) remove a 55-gallon drum from the Gale Ave. property which contained 38-gallons of waste oil and water. This is documented by the attached invoice from Kal Vac to ATEC.

Based on the small quantity of material to be disposed of, Kal Vac combined the waste water from the Gale Ave. property with other waste waters of similar composition (known as a "milk run"). According to Pauline at Industrial Oil Services in Los Angeles, the disposal facility, Kal Vac disposed of over 700 gallons of waste water under a single manifest which included the 38-gallons taken from Gale Ave. Kal Vac is listed as the generator on the manifest. According to Industrial Oil Services, the state Department of Toxics does allow a waste hauler to combine wastes from small quantity generators. The waste hauler pays an additional \$5,000.00 per year for this privilege. Industrial Oil Services has stated that they will fax a copy of the manifest to ATEC later this morning. Upon receipt, I will fax you a copy.

ATEC has placed numerous calls to Kal Vac, in an attempt to secure written documentation from them regarding their removal and transport of the 38-gallons of waste water from the Gale Ave. site. To date, Kal Vac has not responded to the messages left on voice mail. Their number is 310-946-7414. ATEC will continue to call and leave messages.

Greg, I personally apologize for all the problems regarding this manifest. Also, I am sending the paperwork from United Pumping Service for you to sign as the generator. There are two sets, one for the soil and one for the water. Can you fax these back after you sign (714-252-1098). This time we will make sure to obtain transporter documentation at the site. Thanks.

Call 1st

2128

INVOICE



KALVAG

GENERAL CONTRACTOR

11818 Valley View
Whittier, CA 90604

(310) 945-7414

FAX (310) 945-5482

EPA # EAD 980676720

Project # YSC 740012

AIMS Code: _____

P.O. # _____

No. _____

PO# _____

DATE 1-21

1994

TO ATECH SIG

ADDRESS 17415 Gail

CITY Industry

TELEPHONE 714-447-0200 714-252-1094 T&A

MANIFEST NUMBER

DATE REQUIRED

TERMS

92755471

30d

QUANTITY	PLEASE SUPPLY ITEMS LISTED BELOW	UNIT	PRICE
1	Gallon Waste Oil		
2	<u>38</u> Gallon Waste Oil & Water		125.00
3	Test Kit Chlorides		
4			
5			
6			
7			
8	2202 SPRING STREET		
9	SIGNAL HILL, CA		
10	WASTE OIL NOS COMBUSTIBLE LIQUID NA 1270 CODE 221		
TOTAL			125.00

Please Pay From This Invoice

TOTAL 125.00

Industrial Services (Los Angeles)
Paulina
310-869-9667

Disposed Facility

ACCOUNTS PAYABLE APPROVAL FORM

Account to be charged	Amount	Project Number	Task	Agency Code	Approval
415 0739100	125.00	150794	000112	119112	<i>[Signature]</i>
415					
415					
415					
Vendor Number	Total \$	Posting month / year	Date Expires Over the Estimating Month		
	125.00	FEB 94	10, 11, 12 1, 2, 3, 4, 5, 6, 7, 8, 9		

JUN-24-1994 FRI 10:44

WILCOX INC

FRM INV. 000 U 0000

010 000107
P.05/1
1.02

JUN-24-1994 18:01

FROM INDUSTRIAL SERVICE OIL CO TO

918256-46368

P.01

Form Approved GSA No. 2000-0200 (Replaces 7500-9)
Please print or type. Form designed for use on 5 1/2 (11x17) inch paper.

See instructions on back of page 4.

Department of Toxic Substances
Control, California
In accordance with the document control
is not required by Federal law

92755421
IN CASE OF EMERGENCY OR SPILL CALL THE NATIONAL RESPONSE CENTER 1-800-424-9303
CALIFORNIA, WILCOX INC, 1800-887530

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator US EPA ID No. K1A019K01671617201515121911	Manifest Received No. 101	2. Page 1 of 1
3. Generator's Name and Mailing Address Kal-Vac 1825 Valley View Ave Whittier Ca 90604				
4. Generator's Phone 818-996-7115				
5. Transporter 1 Company Name Kal-Vac		6. US EPA ID Number K1A019K0167161720		
7. Transporter 2 Company Name		8. US EPA ID Number		
9. Designated Facility Name and Site Address Industrial Service 1700 S 5th St LA Ca 90023				
10. US EPA ID Number				
11. US DOT Description Including Proper Shipping Name, Hazard Class, and ID Number POLYMERIZABLE COMBUSTIBLE LIQUID UN 1220				
12. Quantity				
13. Net Weight				
14. Net Volume				
15. Special Handling Instructions and Additional Information Emergency Response Mike Harris 310 996-7919				
16. GENERATOR'S CERTIFICATION I hereby declare that the contents of this manifest are true and correctly described above by proper shipping name and are classified, packaged, marked, and labeled, and are in full compliance with the requirements for transport by highway, air, or water as applicable, Federal, State and International laws. If I am a small quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. If I am a small quantity generator, I have made a good faith effort to recycle my waste generation and collect the best available market rate for recycling, reuse, and sale.				
Name/Typed Name Stephen Davis		Signature <i>Stephen Davis</i>		Month Day Year 01 12 15 1994
Name/Typed Name Gary Alan Davis		Signature <i>Gary Alan Davis</i>		Month Day Year 01 12 15 1994
19. Emergency Indicator Space				
Name/Typed Name David Desoto		Signature <i>David Desoto</i>		Month Day Year 01 12 15 1994

DO NOT WRITE BELOW THIS LINE

0105 REGA 07/90
078 070-11

THIS SENDS THE COPY TO DTSC WITHIN 30 DAYS
P.O. Box 2020, Sacramento, CA 95812

TOTAL P.01

TOTAL P.02