PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT, NORTHWEST CORNER OF GALE AVE. AND HATCHER AVE., APNs 8264-001-120 and 8264-001-127, CITY OF INDUSTRY, CALIFORNIA

Prepared For:

INDUSTRY URBAN DEVELOPMENT AGENCY
c/o CNC Engineering
255 North Hacienda Boulevard
City of Industry, California 91744

Project No. 600016-018

June 23, 2003

Leighton Consulting, Inc.
A LEIGHTON GROUP COMPANY

Leighton Consulting, Inc.
A LEIGHTON GROUP COMPANY

June 23, 2003

Project No. 600016-018

To: Industry Urban Development Agency
c/o CNC Engineering
255 North Hacienda Boulevard, Suite 222
City of Industry, California 91744

Attention: Mr. Dale Masl

Subject: Phase I Environmental Site Assessment Report, Northwest Corner of Gale Avenue and Hatcher Avenue, Assessor Parcel Numbers (APNs) 8264-001-120 and 8264-001-127, City of Industry, California

Leighton Consulting, Inc. is pleased to present this Phase I Environmental Site Assessment Report for the subject site.

If you have any questions regarding this report, please do not hesitate to contact me. We appreciate the opportunity to be of service.

Respectfully submitted,

LEIGHTON CONSULTING, INC.

for

Kristin Stout, ~~REA I~~
Project Manager

KAS:vlf

Distribution: (3) Addressee
(1) Leighton Consulting, Inc., Attention: Mike Grace

17781 Cowan ▪ Irvine, CA 92614-6009
949.253.9836 ▪ Fax 949.250.1114 ▪ www.leightonconsulting.com

TABLE OF CONTENTS

Section		Page
EXECUTIVE SUMMARY		E-1
1.0	INTRODUCTION	1
1.1	Authorization	1
1.2	Purpose	1
1.3	Scope of Work	1
1.4	Significant Assumptions	2
1.5	Limitations and Exceptions	2
1.6	Special Terms and Conditions	2
1.7	User Reliance	3
2.0	SITE DESCRIPTION	4
2.1	Site Location and Legal Description	4
2.2	Site and Vicinity General Characteristics	4
2.3	Current Use of the Site	4
2.4	Descriptions of Structures, Roads and Other Improvements on the Site	4
2.5	Current Uses of Adjoining Properties	5
3.0	USER PROVIDED INFORMATION	6
3.1	Title Records	6
3.2	Environmental Liens or Activity and Use Limitations	6
3.3	Specialized Knowledge	6
3.4	Valuation Reduction for Environmental Issues	6
3.5	Owner, Property Manager, and Occupant Information	6
3.6	Reason for Performing Phase I	6
3.7	Other	6
4.0	RECORDS REVIEW	7
4.1	Standard Environmental Record Sources	7
4.1.1	Site	7
4.1.2	Offsite	9
4.2	Additional Environmental Record Sources	11
4.3	Physical Setting Source(s)	22

TABLE OF CONTENTS (Continued)

Section Page

4.3.1 Topography 22
4.3.2 Surface Water 22
4.3.3 Geology and Soils 22
4.3.4 Hydrogeology 23
4.3.5 Wetlands 23
4.3.6 Oil and Gas Fields 23

4.4 Historical Use Information on the Property 23

4.4.1 Aerial Photographs 23
4.4.2 Sanborn Maps 25
4.4.3 Historical Topographic Maps 25
4.4.4 Historical City Directories 26
4.4.5 Additional Resources 26
4.4.6 Summary of Historical Land Use 27

5.0 SITE RECONNAISSANCE 28

5.1 Methodology and Limiting Conditions 28
5.2 General Site Setting 28
5.3 Exterior and Interior Observations 28

5.3.1 Hazardous Substances, Drums, and Other Chemical Containers 28
5.3.2 Storage Tanks 29
5.3.3 Polychlorinated Biphenyls (PCBs) 29
5.3.4 Waste Disposal 29
5.3.5 Dumping 29
5.3.6 Pits, Ponds, Lagoons, Septic Systems, Wastewater, Drains, Cisterns, and Sumps 29
5.3.7 Pesticide Use 29
5.3.8 Staining and Discolored Soils 30
5.3.9 Stressed Vegetation 30
5.3.10 Unusual Odors 30
5.3.11 Onsite Wells 30
5.3.12 Asbestos 30
5.3.13 Lead-Based Paint 30
5.3.14 Other Observations 30

6.0 INTERVIEWS 32

6.1 Interview With Owner 32
6.2 Interview With Site/Property Manager 32
6.3 Interviews With Occupants 32
6.4 Interviews With Local Government Officials 32
6.5 Interviews With Others 32

TABLE OF CONTENTS (Continued)

Section Page

7.0 FINDINGS 33

7.1 Onsite 33
7.2 Offsite 34

8.0 CONCLUSIONS AND RECOMMENDATIONS 35

9.0 DEVIATIONS 37

10.0 ADDITIONAL SERVICES 38

11.0 QUALIFICATIONS 39

11.1 Corporate 39
11.2 Individual 39

TABLE OF CONTENTS (Continued)

List of Accompanying Illustrations and Appendices

Figure 1 – Site Location Map
Figure 2 – Site Plan

Appendix A – References
Appendix B – Site Reconnaissance Photographs
Appendix C – FirstSearch Report
Appendix D – Records of Communication
Appendix E – Report References

EXECUTIVE SUMMARY

Leighton Consulting, Inc. (Leighton Consulting) performed a Phase I Environmental Site Assessment (ESA) of the property located at the northwest corner of Gale Avenue and Hatcher Avenue, Assessor Parcel Numbers (APNs) 8264-001-120 and 8264-001-127, City of Industry, Los Angeles County, California (Figure 1 – Site Location Map). The purpose of this ESA was to identify, to the extent feasible pursuant to the processes prescribed in ASTM International (ASTM) E1527-00, recognized environmental conditions in connection with the subject property (Site). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report. The scope of work for this Phase I ESA included: records review; site reconnaissance; interviews; and report preparation.

On June 10, 2003, Leighton Consulting personnel conducted a reconnaissance-level visit of the Site to observe and document existing site conditions and the nature of the neighboring property development within ¼ mile of the Site.

The immediate Site vicinity consists of commercial and industrial properties. The surrounding area consists of industrial areas.

Historically, the Site was utilized as vacant land, agricultural land, and a railroad spur. The Site is currently bordered by railroad tracks to the north, Hatcher Avenue, a parking lot, and Circuit City to the east, Gale Avenue and Hyundai Puente Hills to the south, and industrial buildings to the east.

The Site currently consists of an approximate 107,000 square foot concrete tile up warehouse/industrial building constructed in 1978. A parking lot surrounds the facility.

The Site is currently occupied by Amptron International Inc. who utilizes the Site for office space, storage, and assembly of computer components (Photos 1 through 3, Appendix B). According to Mr. Leon Hsiao, President and CEO of Amptron International Inc., the Site was vacant for approximately 3 to 5 years prior to their occupancy. The southern portion of the building is currently vacant (Photo 4, Appendix B). Puente Hills Ford utilizes the southern parking lot as a place to store their newer vehicles. Previous occupants of the building include The Coleman Co., Graham Printing and Lithograph Company, and Han Ton Sock Co.

The following utilities provide service to the Site:

Natural Gas	:	The Gas Company
Water	:	Rowland Water District
Electric	:	Southern California Edison
Sanitary Wastewater	:	Los Angeles County Sanitation
Solid Waste Disposal	:	City of Industry Disposal Company

Based on historical records, land usage is summarized as follows:

Time Period	Land Usage	Reference
Prior to 1928	Unknown	None available
1928 to approximately 1953	Vacant land	Aerial Photographs
1953 to approximately 1960	Agricultural	Aerial Photographs
1960 to approximately 1975	Agricultural Railroad spur (northern portion of the Site)	Aerial Photographs Topographic Maps
1975 to approximately 1979	Vacant land Railroad spur (northern portion of the Site)	Aerial Photographs Topographic Maps
1979 to approximately 1987	Industrial building possibly occupied by Coleman Co. Railroad spur (western portion of the Site)	Previous Reports Aerial Photographs Building Permits
1984 to approximately 1988	Industrial building occupied by Graham Printing and Lithograph Co.	Previous Reports Aerial Photographs
1988 to approximately 1997	Industrial building occupied by tenants such as Han Ton Sock Co.	Previous Reports Aerial Photographs
1997 to present	Industrial building occupied by Amptron International Inc.	Building Permits Site Reconnaissance

A search of selected government databases was conducted by Leighton Consulting using Environmental FirstSearch™ Report (FirstSearch™) environmental database report system, prepared by Track Info Services, LLC. Regulatory database lists were reviewed for cases pertaining to leaking underground storage tanks (USTs), above ground storage tanks (ASTs), hazardous waste sites, and abandoned sites within the specified radii of standards established by the ASTM E1527-00. The Site was identified on the FirstSearch™ report.

The Site was formerly occupied by Graham Printing and Lithograph Company which has documented releases to the soil.

The shallow groundwater beneath the Site has been impacted, potentially from Graham Printing and Lithographic Company, but also potentially from other upgradient, offsite sources. Low levels of volatile organic compounds (VOCs) and petroleum hydrocarbons have been identified in the soil. The concentrations of VOCs identified in the soil and groundwater are below industrial Preliminary Remediation Goals (PRGs) established by the U.S. Environmental Protection Agency (EPA). Petroleum hydrocarbon impacted soil in the vicinity of the former compressor area has been remediated (disposed of offsite). The Site has been issued a closure letters by the Regional Water Quality Control Board (RWQCB) and Los Angeles Fire Department (LACFD) (copies of these letters have been provided in Appendix E).

The Site is located within an area of regional groundwater contamination. The groundwater is contaminated with trichloroethene (TCE) and tetrachloroethene (PCE). The Site has been identified as a contributor (PRP) to this regional groundwater contamination and has negotiated a settlement with the Puente Valley Steering Committee (see Appendix E). If dewatering is to occur during future construction practices, the groundwater may require treatment prior to discharge.

One groundwater monitoring well was formerly located in the northwest corner of the Site. This well was not observed onsite during the site reconnaissance; however record of its abandonment was not found during the Phase I ESA. It is not known if the well was properly abandoned.

The reported past agricultural use suggests that pesticides may have been used at the site in the past. However, the site has been graded and developed with an industrial building present onsite. Therefore, the potential former use of pesticides onsite is not considered a recognized environmental condition.

An asbestos or lead survey was not performed as part of this investigation. Previous limited asbestos surveys were conducted onsite (see Section 4.2). Floor tile within the structure was previously noted to contain asbestos. Due to the age of the building, it is possible that additional asbestos-containing building materials or lead-based paint are present in the structure. A thorough asbestos and lead survey should be completed prior to any demolition or remodeling activities.

The RWQCB has noted that releases of VOCs have been documented at other offsite manufacturing facilities nearby the Site.

Based upon the findings of this Phase I ESA, Leighton Consulting recommends:

- In the event that the monitoring well has not been properly abandoned, it is recommended that the well be properly abandoned in accordance with current regulatory guidelines.

- There is no current need for further assessment of the contaminated soil and groundwater in the subsurface, as regulatory "no further action" letters have been issued for the Site. If further construction activities are conducted in the subsurface, an analysis of the soil should be conducted in regard to construction worker health and safety issues. All excavated soil should be profiled prior to disposal.

- Prior to demolition or renovation of the site building, a comprehensive asbestos survey and lead-based paint survey should be performed. If asbestos or lead-based paint is found in the building materials that will be disturbed by the demolition/renovation activities, the material should be abated by a qualified contractor under current local, state and federal regulations.

- In general, observations should be made during any future site development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, tanks, staining soil or odorous soils. Should such materials be encountered, further investigation and analysis may be necessary at that time.

1.0 INTRODUCTION

1.1 Authorization

Leighton Consulting, Inc. (Leighton Consulting) performed a Phase I Environmental Site Assessment (ESA) of the property located at the northwest corner of Gale Avenue and Hatcher Avenue, Assessor Parcel Numbers (APNs) 8264-001-120 and 8264-001-127, City of Industry, Los Angeles County, California (collectively referred to as the "Site" – Figure 1) in accordance with CNC Engineering's authorization.

1.2 Purpose

The purpose of the Phase I ESA was to identify, to the extent feasible pursuant to the processes prescribed in ASTM International (ASTM) E1527-00, recognized environmental conditions in connection with the Site. Recognized environmental conditions are defined as the presence of likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimus conditions that generally do not present a material risk of harm to public health or the environmental and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

1.3 Scope of Work

The scope of work was performed in accordance with Leighton Consulting's proposal and included the following tasks:

- A reconnaissance-level visit of the Site for evidence of the release(s) of hazardous materials and petroleum products and to assess the potential for onsite releases of hazardous materials and petroleum products;
- Records review (including review of previous environmental reports, selected governmental databases, and historical review);
- Interviews; and
- Preparation of a report presenting our findings.

1.4 Significant Assumptions

Leighton Consulting assumes that the purpose of this ESA is to provide appropriate inquiry into the previous ownership and use of the Site so that the Client may qualify for the "innocent landowner defense" under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, 42 USC subparagraphs 9601(35) and 9607(b)(3)). Leighton Consulting also assumes that the information provided by the Client, regulatory database provider, and regulatory agencies is true and reliable.

1.5 Limitations and Exceptions

Site-specific activities performed by Leighton Consulting and information collected regarding these activities are summarized in the following sections. The findings of this ESA are presented in Section 7.0. Opinions, and conclusions drawn by Leighton Consulting, based on the information collected as part of the ESA, are presented in Sections 8.0 and 9.0, respectively.

Due to lack of available historical resources, historical records have not been reviewed prior to 1928.

This ESA was conducted in a manner consistent with that level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions.

The observations and conclusions presented in this report are professional opinions based on the scope of activities, work schedule, and information obtained through the ESA described herein. Opinions presented herein apply to site conditions existing at the time of our study and cannot necessarily be taken to apply to site conditions or changes that we are not aware of or have not had the opportunity to evaluate. It must be recognized that conclusions drawn from these data are limited to the amount, type, distribution, and integrity of the information collected at the time of the investigation, the methods utilized to collect and evaluate the data, and that a full and complete determination of environmental risks cannot be made. Although Leighton Consulting has taken steps to obtain true copies of available information, we make no representation or warranty with respect to the accuracy or completeness of this information.

1.6 Special Terms and Conditions

The scope of work for this Phase I ESA did not include testing of electrical equipment for the presence of polychlorinated biphenyls (PCBs) or collection of other environmental samples such as air, water, building materials, or paint; assessment of natural hazards such as naturally occurring asbestos, radon gas or methane gas; assessment of the potential presence of radionuclides; or assessment of nonchemical hazards such as the potential for damage from earthquakes or floods, or the presence of endangered species or wildlife habitats. This ESA also did not include an extensive assessment of the environmental compliance status of the Site or of the businesses operating at the Site, or a health-based risk assessment.

1.7 User Reliance

This report is for the exclusive use of CNC Engineering and Industry Urban Development Agency. Use of this report by any other party shall be at such party's sole risk.

2.0 SITE DESCRIPTION

2.1 Site Location and Legal Description

The Site is located at the northwest corner of Gale Avenue and Hatcher Avenue within the City of Industry, California (Figure 1). The County of Los Angeles Assessor's office designates the Site as APNs 8264-001-120 and 8264-001-127. The legal description for APN 8264-001-120 is listed as P M 81-28 THAT POR IN TRA 8253 OF LOT 1 and the legal description of APN 8264-001-127 is listed as P M 81-28 VAC ST ADJ ON NE AND THAT POR IN TRA 8267 OF LOT 1. Several addresses were found to be associated with the Site through interviews with the current occupant and review of previous reports: 17245, 17475, and 17489 Gale Avenue and 1201 and 1239 Hatcher Avenue.

2.2 Site and Vicinity General Characteristics

The immediate Site vicinity consists of commercial and industrial properties. The surrounding area consists of industrial areas.

2.3 Current Use of the Site

The Site is currently occupied by Amptron International Inc. who utilizes the Site for office space, storage, and assembly of computer components (Photos 1 through 3, Appendix B). According to Mr. Leon Hsiao, President and CEO of Amptron International Inc., the Site was vacant for approximately 3 to 5 years prior to their occupancy. The southern portion of the building is currently vacant (Photo 4, Appendix B). Previous occupants of the building include The Coleman Co., Graham Printing and Lithograph Company, and Han Ton Sock Co.

Puente Hills Ford utilizes the southern parking lot as a place to store their newer vehicles.

2.4 Descriptions of Structures, Roads and Other Improvements on the Site

The Site currently consists of an approximate 107,000 square foot concrete tilt-up warehouse/industrial building constructed in 1978. A parking lot surrounds the facility.

The following utilities provide service to the Site:

Natural Gas	:	The Gas Company
Water	:	Rowland Water District
Electric	:	Southern California Edison
Sanitary Wastewater	:	Los Angeles County Sanitation
Solid Waste Disposal	:	City of Industry Disposal Company

2.5 Current Uses of Adjoining Properties

The Site is currently bordered by railroad tracks to the north, Hatcher Avenue, a parking lot, and Circuit City to the east, Gale Avenue and Hyundai Puente Hills to the south, and industrial buildings to the east.

3.0 USER PROVIDED INFORMATION

The user of this Phase I ESA is identified as the client, CNC Engineering.

3.1 Title Records

A preliminary title report was not provided by CNC Engineering.

3.2 Environmental Liens or Activity and Use Limitations

Evidence of environment liens or activity or land use limitations was not disclosed to Leighton Consulting.

3.3 Specialized Knowledge

Specialized knowledge was not disclosed to Leighton Consulting.

3.4 Valuation Reduction for Environmental Issues

Evidence of valuation reduction for environmental issues was not disclosed to Leighton Consulting.

3.5 Owner, Property Manager, and Occupant Information

Leighton Consulting interviewed Mr. Leon Hsiao, President and CEO of Amptron International Inc. and Manager of ICUE Holdings, LLC who is the present owner of the Site. According to Mr. Hsiao, ICUE has owned the facility since March 2000. Amptron International Inc. owned the Site from approximately February 1997 to March 2000. RREEF West-VI, Inc. was the former owner of the Site who owned the facility for approximately 10 years. Mr. Hsiao stated that the structure had been vacant for approximately 3 to 5 years prior to Amptron's occupation of the Site. Mr. Hsiao noted the presence of two storm drains located onsite. In addition, he noted to refer to all documents provided to the city. A review of these documents has been summarized in Section 4.2. A copy of this interview has been provided in Appendix D.

3.6 Reason for Performing Phase I

Leighton Consulting assumes that the purpose of this ESA is to provide appropriate inquiry into the previous ownership and use of the Site so that the Client may qualify for the "innocent landowner defense" under CERCLA (42 USC subparagraphs 9601(35) and 9607(b)(3)).

3.7 Other

Additional information was not provided by CNC Engineering.

4.0 RECORDS REVIEW

4.1 Standard Environmental Record Sources

A search of selected government databases was conducted by Leighton Consulting using Environmental FirstSearch™ Report (FirstSearch™) environmental database report system, prepared by Track Info Services, LLC. Details of the database search along with descriptions of each database researched are provided in the FirstSearch™ report (Appendix C). The report meets the government records search requirements of ASTM E1527-00 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The database listings were reviewed within the specified radii established by the ASTM E1527-00.

4.1.1 Site

The Site was identified on the FirstSearch™ report. Graham Printing and Lithograph (17475 Gale Avenue) was identified on the "Other" database listing which is the Los Angeles County Site Mitigation Complaint Control Log compiled by the Los Angeles County Department of Public Health Investigations. According to the information provided, the case number of the facility is 88S083. This site was considered abated on July 14, 1994. Additional information was not provided under this listing. This date is concurrent with the date of the Los Angeles County Fire Department (LACFD) closure letter (see Section 4.2).

The Site was also identified under the Resource Conservation Recovery Act (RCRA) Generators database listing. According to the information provided, the facility is a small quantity generator. Violations or enforcement actions were not noted.

In addition, the Site is located within or near an area of regional groundwater contamination, the San Gabriel Valley Superfund Site, Puente Valley Operable Unit. The groundwater contamination in the San Gabriel Valley was first detected in 1979 in a groundwater well operated by the Valley County Water District. Following this discovery, the California Department of Health Services (DHS) initiated a well sampling program to assess the extent of contamination. By 1984, 59 wells were found to be contaminated with high levels of volatile organic compounds (VOCs). VOCs are solvents that evaporate easily at room temperature and are commonly used in dry cleaning, paint stripping, metal plating and machinery degreasing. VOC contaminants in the San Gabriel Valley groundwater include tetrachloroethene (PCE), trichloroethene (TCE) and carbon tetrachloride. Groundwater contamination in the San Gabriel Valley is a result of decades of handling and disposal practices which released VOCs into the soil and groundwater. The Environmental Protection Agency (EPA) added four areas of the San Gabriel Valley to the National Priorities List (NPL) in 1984 and began efforts to understand the nature and extent of the soil and

groundwater contamination, identify sources of the contamination, develop a basin-wide plan to set cleanup priorities, and develop the institutional framework necessary to address the contamination.

Beginning in about 1990, the California Regional Water Quality Control Board (CRWQCB), Los Angeles Region, working under a Cooperative Agreement with the EPA, began to identify the sources of the groundwater contamination. The CRWQCB has inspected more than 3,000 commercial and industrial businesses in the San Gabriel Valley area, and required testing of soil, soil-vapor, or groundwater at facilities where the potential for contamination existed. Using the test results, historical State and local records, responses to information requests, and other investigative techniques, EPA determined that 165 parties in the San Gabriel Valley have significantly contributed to the groundwater contamination. The EPA has sent "no further action" letters to over 2,000 parties to inform them that the EPA does not believe that they have contributed to the groundwater contamination.

There are six active operable units within the San Gabriel Valley NPL Site. Area 4, designated as the Puente Valley Operable Unit (PVOU), occupies an approximately 12.5-mile long and 2- to 2.5-mile-wide tributary basin to the main San Gabriel Basin. It includes most of the City of Industry and parts of the city of La Puente. The Site is located in this area.

The primary contaminants in the PVOU are various industrial solvents (VOCs) including, but not limited to, PCE and TCE. In general, VOC concentrations are highest in the shallow groundwater beneath facility source areas where releases have occurred. VOCs have also spread to the intermediate zone and portions of the deep zone primarily as a result of downward hydraulic gradients. The shallow zone encompasses an elongated area approximately bounded by Puente Avenue on the North/West side to Nogales Street on the South/East side and generally follows San Jose Creek as an approximate centerline.

In 1997, the EPA completed a Preliminary Baseline Risk Assessment for the PVOU (CH2MHill, 1994). The purpose of the risk assessment was to evaluate potential adverse health effects from exposure to contaminated groundwater. The results of the risk assessment assisted the EPA in determining if any remedial actions would be necessary to protect human health or the environment. Part of this risk assessment included a screening assessment which was used to quantitatively evaluate potential risk to current workers, future workers, and residents as a result of exposure to contaminants in groundwater through the transport of VOCs from groundwater through the foundation of a building. The estimated hazard quotient was less than one for both the residential and worker exposure scenarios which indicates that the non-carcinogenic effects from exposure to the chemicals studied are unlikely. Additionally, the estimated lifetime cancer risk was below or within the EPA's acceptable risk range.

The EPA released a Record of Decision in September 1998 that specified pumping and treating the groundwater to remove contaminants. The EPA issued "Special Notice" letters for remedial design and remedial action in September 2000, which commenced the negotiations with the Principal Responsible Party (PRPs) to build the remedy. In 2001, the EPA issued an Order to one PRP to design and construct the shallow-zone (between the water table and 150 below ground surface [bgs]) groundwater treatment system. When the PRP did not comply with the Order, the EPA took over the remedial design and expects to complete construction in 2003. The EPA issued an Order to design and build the system for the intermediate groundwater zone in 2002. The PRP complied with this Order and has begun to design the treatment system.

Currently, design work is underway for both the shallow and intermediate zone remedies (EPA. 2002).

The Site has been identified as a PRP and according to a letter issued by the US EPA (see Section 4.2), the former owner of the Site, RREEF West-IV Inc., has negotiated settlements with a subgroup of the Puente Valley Steering Committee (US EPA, 2000). The Site has been issued a "no further action" letter from the CRWQCB.

4.1.2 Offsite

Federal NPL List: The EPA's NPL of uncontrolled or abandoned hazardous waste sites was reviewed for sites within a mile radius of the Site. To appear on the NPL, sites must have met or surpassed a predetermined hazard ranking system score, been chosen as a State's top priority site, pose a significant health or environmental threat, or be a site where the EPA has determined that remedial action is more cost effective than removal action. The database search identified one NPL listed area within a mile of the Site. The San Gabriel Valley (Area 4) regional groundwater contamination was identified within 0.81 miles of the Site. The Site is located within or near Area 4, see Section 4.1.1.

Federal CERCLIS List: The EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) listings were reviewed to determine if sites within ½-mile of the Site are listed for investigation. The CERCLIS database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment. The database search did not identify any State equivalent CERCLIS facilities within 0.50 miles of the Site.

Federal RCRA List: The current Resource Conservation Recovery Act (RCRA) Notifiers List was reviewed to determine if RCRA treatment, storage, or disposal sites (TSDs) are located within 0.50 miles of the Site. The database search identified one RCRA TSD facilities within 0.50 miles of the Site. HH Rovertson Co. Wasd, 999 South Hatcher Avenue, is located approximately 0.40 miles northeast of the Site. According to the

information provided, several enforcements and violations were issued to the facility. Due to the nature of the listing this facility is unlikely to have the potential to adversely impact the Site.

The RCRA Corrective Action Sites List is maintained for sites, which are undergoing "a corrective action." A corrective action order is issued when there has been a release of hazardous waste constituents into the environment from a RCRA facility. The database search did not identify any RCRA Corrective Action facilities within a mile of the Site:

The RCRA regulated hazardous waste generator notifiers list was reviewed to determine if RCRA generator facilities are adjoining the Site. The database search did not identify any generators located adjacent to the Site.

Emergency Response Notification System (ERNS): The EPA's database of emergency response actions was reviewed. The database search did not identify any ERNS listings located adjacent to the Site.

Toxic Release Inventory System (TRIS): The EPA's index of all facilities that have had or may be prone to toxic material releases was reviewed. The database search did not identify any TRIS facilities within 0.125 miles of the Site.

Department of Toxic Substances Control (STATE) Sites: The Department of Toxic Substances Control (DTSC) STATE database contains potential or confirmed hazardous substance release properties. The database search identified one STATE facility within a mile radius of the Site. Teledyne Casting Service, 16800 Chestnut Street, is located approximately 0.96 miles northwest of the Site. According to the information provided, the 5.5-acre facility began producing metal castings for aerospace and gas turbine industries in 1981. The casting process involves pouring metal alloy containing nickel and chromium into a mold. Soil sampling revealed nickel and chromium soil contamination and VOC contaminated groundwater. The facility is currently under investigation. Due to the distance of the listed facility to the subject site and the direction of groundwater flow, this facility is not likely to have the potential to adversely impact the Site.

Solid Waste Landfill Facilities: This database, provided by the Department of Consumer and Regulatory Affairs, consists of both open, as well as closed and inactive solid waste disposal facilities and transfer stations (SWL). The database search identified one SWL sites within 0.50 miles of the Site. Grand Central Recycling and Transfer Station, 999 Hatcher Boulevard, is located approximately 0.40 miles northeast of the Site. According to the information provided, the facility is a permitted large volume transfer and processing facility which accepts construction, demolition, green materials and mixed municipal waste materials. Due to the nature of the listing and the distance of the listed facility to the subject site, this facility is not likely to have the potential to adversely impact the Site.

Underground Storage Tank (UST) Sites: The California State Water Resources Control Board (SWRCB) Underground Storage Tank inventory list was reviewed to determine if any USTs are located adjacent to the Site. The database search identified five UST facilities located within 1/8-mile of the Site; however none of these facilities were immediately adjacent to the Site or listed on the leaking underground storage tank (LUST) database.

Leaking Underground Storage Tank (LUST) Sites: The EPA maintains lists of information pertaining to reported LUSTs in the state. The database search identified 14 LUST cases between 0.25 and 0.50 miles of the Site. However, 12 of these LUST facilities have been issued "closure" by the regulatory agency and are therefore not described. One facility, 76 Products Station #5621 was identified twice on the listing. This facility is located approximately 0.46 miles northwest of the Site. According to the information provided, a release of gasoline was reported on February 28, 1990. A remediation plan has been developed. Due to the distance of the listed facility to the subject site and the direction of groundwater flow, this facility is not likely to have the potential to adversely impact the Site.

Unmapped Listings: Several properties were listed within the FirstSearch™ report as "unmapped listings". Unmapped listings are properties without a complete street address and therefore cannot be located on a map. Leighton Consulting reviewed these listings and determined if the properties were possibly located near the Site. None of the listings were determined to be located near the Site. Based on the information provided in the FirstSearch™ report, these unmapped sites are unlikely to have the potential to adversely impact the Site.

4.2 Additional Environmental Record Sources

Gradient contacted local governmental agencies to determine if records exist for the Site. Records were requested for the following addresses: 17245, 17475, and 17489 Gale Avenue and 1201 and 1239 Hatcher Avenue.

Regional Water Quality Control Board, UST Unit

A file review request was forwarded to the Regional Water Quality Control Board, Los Angeles Region (CRWQCB), UST Unit via facsimile. Mr. Cesai Campos at the CRWQCB indicated via a telephone conversation that there are no records for the Site.

Regional Water Quality Control Board, SLIC Unit

A file review request was forwarded to the Regional Water Quality Control Board, Los Angeles Region (CRWQCB), SLIC Unit via facsimile. Michael at the CRWQCB indicated via a telephone conversation that there are no records for the Site.

Regional Water Quality Control Board, Well Investigation Program

A file review request was forwarded to the CRWQCB, Well Investigation Program via facsimile. On June 17, 2003 Gradient reviewed records at the CRWQCB for 17475 Gale Avenue. These records were similar to the records supplied by the client. These records are summarized below.

Los Angeles County Health Department

On June 9 and 10, 2003, a file review request was forwarded to Los Angeles County Health Department via mail. At the time this report was issued, a response has not been received from the Los Angeles County Health Department. Leighton Consulting will forward all responses received in the form of an addendum letter.

Department of Toxic Substances Control

A file review request was forwarded to the Department of Toxic Substances Control, Cypress Division. On June 16, 2003, Ms. Julie Johnson indicated via a letter that there were no records for 17489 Gale Avenue and 1201 Hatcher Avenue. At the time this report was issued, a response has not been received from the Department of Toxic Substances Control, Cypress Division for 17245 and 17475 Gale Avenue and 1239 Hatcher Avenue. Leighton Consulting will forward all responses received in the form of an addendum letter.

A file review request was forwarded to the Department of Toxic Substances Control, Glendale Division. On June 16, 2003, Ms. Julie Johnson indicated via a letter that there were no records for 17245 and 17475 Gale Avenue and 1239 Hatcher Avenue. At the time this report was issued, a response has not been received from the Department of Toxic Substances Control, Glendale Division for 17489 Gale Avenue and 1201 Hatcher Avenue. Leighton Consulting will forward all responses received in the form of an addendum letter. Department of Toxic Substances Control, Glendale Division via facsimile.

South Coast Air Quality Management District (SCAQMD)

A file review request was forwarded to the SCAQMD. Ms. Linda Mills at the SCAQMD indicated via mail that there are no records for 17245 and 17489 Gale Avenue and 1201 and 1239 Hatcher Avenue. Records were found for 17475 Gale Avenue. The records included a Facility Equipment List Report which listed permits issued to Ban Pro of

California and Graham Printing and Lithograph in 1988 to 1990 for printing presses. The permits are currently inactive. One notice of violation was issued on May 12, 1998 for failure to obtain a permit to operate equipment.

State of California

In 1990, the State of California (1990) conducted a radon survey in the state. The results of the survey indicate that for the 182 samples obtained from residential homes in Region 9, which includes Los Angeles County, the arithmetic mean radon levels were 0.6 picoCuries per liter of air (pCi/l).] This average total is below the U. S. EPA radon action level of 4 pCi/l of air. Therefore, the potential for elevated radon levels at the Site appears to be low.

Client-Supplied Documentation

The client supplied information on previous environmental investigations at the Site. The following is a summary of the review of this material. This information was supplemented by CRWQCB, WIP records.

TERRA TECH Mobile Laboratory Specialists, Inc. (TERRA TECH), 1988, Preliminary Study, Graham Printing and Lithograph, 17475 Gale Avenue, Industry, California, December 26, 1988. TERRA TECH drilled five soil borings to a depth of 10 feet bgs and one soil boring to a depth of 15 feet bgs in the area surrounding the stained pavement in the storage yard. Soil samples were analyzed for total recoverable petroleum hydrocarbons (TRPH) by EPA Method 418.1. Two soil samples were analyzed for volatile organic compounds (VOCs) by EPA Method 8240. TRPH was detected at concentrations ranging from non detect (<1.0 mg/kg) to 1,190 mg/kg. One soil sample collected of the surface soil contained TRPH concentration of 180,000 mg/kg. Concentrations of acetone (40 µg/kg and 370 µg/kg), 2-butanone (19 µg/kg and 170 µg/kg), 4-methyl-2-pentanone (22 µg/kg and 240 µg/kg), 1,1,1-trichloroethane (50 µg/kg) were detected in the two soil samples analyzed for VOCs. TERRA TECH recommended that the affected soil be removed to the depths as revealed in the borings and conduct verification soil sampling to confirm that the contaminated soil has been removed from the affected area.

Regional Water Quality Control Board, 1989, Inspection, April 5, 1989. The CRWQCB conducted an onsite inspection at the facility and documented the presence of surface staining and open boreholes onsite. They also noted that the facility did not exhibit good housekeeping practices and was not clean.

Graham Printing and Lithograph Company, 1989, Chemical Storage and Use Questionnaire submitted to the Regional Water Quality Control Board, April 7, 1989. This questionnaire stated that onsite operations began in July 1986. The operations consist of printing and folding cartons and support equipment is required. The

questionnaire stated that the following chemicals are used onsite: alcohol, blanket wash, roller wash, printing ink, oil, and kerosene. This questionnaire was completed by Charles Graham.

Geological Audit Services, Inc. (GAS), Monitoring Well Installation and Water Sample Analysis, Graham Printing and Lithograph, 17475 Gale Avenue, City of Industry, California, November 17, 1989. GAS installed one groundwater monitoring well at the request of the CRWQCB based on their review of the TERRA TECH report. The soil samples collected at depths of 1 feet bgs and 45 feet bgs were analyzed for VOCs by EPA Method 8240. Groundwater was encountered at 42 feet bgs. The water sample was analyzed for VOCs by EPA Methods 601 and 602. VOCs were not detected in the soil or groundwater samples. GAS concluded that it was unlikely that the VOCs detected in TERRA TECH's investigation have migrated 32 feet through predominantly very stiff to hard silty clay to the groundwater.

California Regional Water Quality Control Board, Los Angeles Region, 1990a, Letter to Graham Printing and Lithograph Company, Well Investigation Program, March 23, 1990. The CRWQCB reviewed GAS' report and concluded that they did not meet the CRWQCB requirements. The CRWQCB directed Graham to collect a representative water sample which may equate to installing a new properly designed and constructed monitoring well.

California Regional Water Quality Control Board, Los Angeles Region, 1990b, Letter to Graham Printing and Lithograph Company, Well Investigation Program, October 22, 1990. The CRWQCB had reviewed GAS' proposal to redevelop/repurge the groundwater monitoring well in an attempt to lower turbidity levels. The CRWQCB approves the proposal provided that additional requirements are incorporated into the workplan.

Geological Audit Services, Inc. (GAS), 1990, Groundwater Sample Analysis, Graham Printing and Lithograph, 17475 Gale Avenue, City of Industry, California, November 20, 1990. Groundwater was encountered at a depth of 36.39 feet bgs. TRPH and VOCs were not detected in the water sample.

California Regional Water Quality Control Board, Los Angeles Region, 1991, Letter to Graham Printing and Lithograph Company, Inc., Well Investigation Program, January 22, 1991. The CRWQCB reviewed GAS' letter transmitting the groundwater assessment report. The CRWQCB requested that the well be monitored for four additional quarters in accordance with additional requirements.

Boelter Environmental Consultants, 1991, Letter Report, Graham Printing and Lithography, BACI Project #102-0386, January 25, 1991. Letter report summarizing the presence of an unidentifiable metal piece observed to be imbedded in the asphalt at the rear

of the facility. Records were reviewed at the Los Angeles County Department of Public Works (LACDPW) to determine if any USTs were located onsite. Records were not found at the LACDPW. The asphalt was then exposed around the metal piece and it was determined to be a flange of unknown origin. Below the flange were wood chips and dirt.

Geological Audit Services, Inc. (GAS), 1991a, Groundwater Sample Monitoring #1, Graham Printing and Lithograph, 17475 Gale Avenue, City of Industry, California, February 28, 1991. Groundwater was encountered at a depth of 36.77 feet bgs. TRPH was detected in the water sample at a concentration of 4 mg/L. 1,1-dichloroethene (DCE), 1,1,1-trichloroethane (TCA), and xylenes were detected in the water sample at concentrations of 7.5 µg/L, 4.4 µg/L, and 1.4 µg/L, respectively. The report noted that these may be background levels.

Geological Audit Services, Inc. (GAS), 1991b, Groundwater Sample Monitoring #2, Graham Printing and Lithograph, 17475 Gale Avenue, City of Industry, California, June 1, 1991. GAS sampled the monitoring well in May 1991. Groundwater was encountered at a depth of 35.75 feet bgs. TRPH was detected in the water sample at a concentration of 0.7 mg/L. VOCs were not detected in the water sample.

Geological Audit Services, Inc. (GAS), 1991c, Remedial Action Work Plan for Graham Printing and Lithograph, 17475 Gale Avenue, City of Industry, California, November 30, 1991. The work plan was prepared to assess the vertical extent of hydrocarbon contamination in the compressor and barrel storage areas. The work plan summarizes proposes excavation activities and soil sampling.

ATEC Environmental Consultants (ATEC), 1993a, Subsurface Investigation, Former Graham Printing Facility, 17475 Gale Avenue, City of Industry, California, ATEC Project No. 43-07-92000582, January 18, 1993. ATEC drilled four soil borings to a depth of 30 feet bgs in the drum storage and compressor areas. Twenty-four soil samples were analyzed for TRPH by EPA Method 418.1 and VOCs by EPA Method 8240. TCA and DCE were detected at maximum concentrations of 44 and 23 parts per billion (ppb) at 20 feet bgs in the former drum storage area. According to ATEC, TRPH was not detected above action levels in the compressor area. In addition, VOCs were not detected in the compressor area. Groundwater was encountered at a depth of 35.56 feet bgs. TRPH was not detected in the water sample. DCE, TCA, and xylenes were detected in the water sample at concentrations of 21.0 µg/L, 6.0 µg/L, and 0.4 µg/L, respectively.

ATEC Environmental Consultants (ATEC), 1993b, Waste Characterization at Former Graham Printing Facility, 17475 Gale Avenue, City of Industry, California, ATEC Project No. 43-07-9302089, April 2, 1993. ATEC completed an inventory of wastes and hazardous materials on the Site.

ATEC Environmental Consultants (ATEC), 1993c, DRAFT Phase I Environmental Site Assessment, Vacant Industrial Building, (Formerly Graham Printing and Lithograph Company), 17475 Gale Avenue, City of Industry, California, 91748, ATEC Project No. 43-07-9302112, April 15, 1993. ATEC summarized previous subsurface investigations and groundwater monitoring activities. ATEC also noted the presence of approximately 225 full, partially full, or empty chemical containers which were abandoned onsite by the former tenant (Graham Printing and Lithograph). ATEC also observed evidence of improper release of hazardous chemicals into two of the onsite sinks located at the north end of the building. The sinks were observed to be heavily stained with ink or another unknown substance. ATEC also conducted a limited asbestos survey which identified floor tile mastic to be an asbestos containing material (ACM). ATEC recommended that a small area of damaged tile be repaired and that an Operations and Maintenance Plan be implemented to monitor the condition of all ACM and suspect ACM onsite. In addition, ATEC recommended the completion of the investigative activities requested by the CRWQCB which includes a full historical audit of the Site with a soil gas survey conducted in the problem areas identified in the historical audit, completion of one year groundwater monitoring activities, and remediation of the soil determined to be impacted by petroleum hydrocarbons and possible VOCs.

ATEC Environmental Consultants (ATEC), 1993c, Asbestos Roof Survey, Vacant Industrial Building, 7475 Gale Avenue, City of Industry, California 91748, ATEC Project No. 43-07-9302112, April 27, 1993. Fifteen bulk samples of suspect asbestos containing roofing materials were collected and analyzed for asbestos. The materials included one type of roof shingle, one type of roof mastic, and one type of field roof. Asbestos was not detected in any of the analyzed samples.

ICF Kaiser Engineers, Inc. (ICF KE), 1993a, Soil Gas Survey Work Plan and Historical Chemical Use Audit and Assessment Plan, 17475 Gale Avenue, City of Industry, California, September 1, 1993. This work plan summarizes a site walk conducted by ICF KE and proposes a soil gas survey and chemical use audit.

ICF Kaiser Engineers, Inc. (ICF KE), 1993b, Historical Chemical Use Audit and Assessment for Former Graham Printing and Lithograph Company Site, 17475 East Gale Avenue, City of Industry, California, ICF KE Project No.41428, October 13, 1993. This report summarized past site usage as well as summarized known chemicals used onsite. A copy of this inventory has been included in Appendix E.

ICF Kaiser Engineers, Inc. (ICF KE), 1993c, Summary of Findings for the Soil Gas Survey Conducted at 17475 Gale Avenue, City of Industry, California, October 13, 1993. A total of 45 soil gas samples were collected from various depths at 34 soil gas sampling locations. Soil gas samples were analyzed for VOCs by EPA Method 8010/8020 and ketones. Results of the soil gas investigation indicated the presence of low concentrations of 1,1,1-trichloroethane (TCA), 1,1-dichloroethene (DCE), tetrachloroethene (PCE), and

trichloroethene (TCE) in the soil gas samples. Ketones were not detected in any of the analyzed soil gas samples. Two potential source areas were apparent from the results of the investigation, one located east of the former drum storage area, and the other located within the building near the northwestern corner of the printing pad. ICF KE concluded that the concentrations of TCA and DCE detected in the soil gas samples collected near the waste storage area and the former printing equipment pads are at very low levels (<200 µg/L). The lateral extent of the soil gas contaminants in these areas appears highly localized. The probability of the soil gas contaminants migrating to the groundwater is presumed to be very low because of the low levels of contamination and the apparent low permeability of the clayey soil beneath the Site. ICF KE recommended that a focused supplemental soil investigation be conducted to determine the presence of any soil contaminants in the two areas identified in the soil gas survey, to investigate the vertical extent of potential contamination, verify the presence of low permeability clays, and collect a groundwater sample to verify the results from the most recent sampling event. Copies of the soil gas contour maps have been included in Appendix E.

ICF Kaiser Engineers, Inc. (ICF KE), 1993d, Report of Supplemental Site Investigation Work at the Former Graham Printing & Lithograph Facility at 17475 Gale Avenue, City of Industry, California, ICF KE Project No. 41428, RWQCB File No.105.0113, December 13, 1993. Soil gas sampling was conducted by ICF KE in each of the two areas identified during the previous soil gas survey as requested by the CRWQCB to verify that higher concentrations of VOCs do not exist in the soil gas at depth. Soil gas samples were collected at depths of 18, 23, and 25 feet bgs. Analytical results of the soil gas samples indicated that 1,1-DCAis not present at 18 feet bgs, but is present at a very low concentration (1.9 µg/L) at 23 feet bgs. The results indicated that 1,1,1-TCA is not present at 18 feet bgs or 23 feet bgs. When compared to previous soil gas survey results, the investigation confirmed that the VOC concentrations from the deeper soil gas samples are similar or lower than the already relatively low VOC concentrations detected in shallow soil gas samples.

ICF Kaiser Engineers, Inc. (ICF KE), 1993e, Quarterly Groundwater Quality Monitoring Report, Former Graham Printing & Lithograph Facility at 17475 Gale Avenue, City of Industry, California, ICF KE Project No. 41428, RWQCB File No.105.0113, December 17, 1993. In accordance with CRWQCB requirements, ICF KE collected two water samples from the groundwater monitoring well. The first water samples was collected before purging the well and submitted to the laboratory for analysis of TRPH by EPA Method 418.1. The purpose of this sample was to assess the potential presence of floating product on the groundwater. The second water sample was collected after purging and was analyzed for VOCs by EPA Method 502.2. Groundwater was detected at a depth of approximately 32.42 feet bgs. TRPH was not detected in the pre-purge water sample. VOCs were detected in the water sample collected after purging. Specifically, 1,1-DCE was detected at 120 µg/L and 1,1,1-TCA was detected at 21 µg/L.

ICF KE concluded that the concentration of VOCs detected in the soil gas at the Site do not appear to support the concentrations of VOCs detected in groundwater at the Site. Additionally, the presence of a thick, dense clay layer under the Site and above the sampled aquifer would result in a retarded migration of any contaminants found in shallow soils, as reflected by the attenuation of the soil gas concentration as reported by ICF KE. Based on the assessment, ICF KE concluded that the source of the groundwater contamination is likely located offsite.

California Regional Water Quality Control Board, Los Angeles Region, 1994a, Letter to RREEF Funds, No Further Action Decision Concerning Volatile Organic Compound Guided Soil Remediation for Former Graham Printing and Lithograph Site at 17475 Gale Avenue, City of Industry, California (File No. 105.0113), February 16, 1994. The letter summarized the Site's historical background and previous subsurface investigations and noted that released of 1,1-DCE and 1,1,1-TCA to groundwater have been documented at other facilities nearby. Since shallow soils at one or more areas within the property had been impacted by waste discharges, the Site was referred by the CRWQCB to the LACFD for oversight of appropriate remedial activities. In addition, the CRWQCB required collecting groundwater samples on a quarterly schedule for a period of two quarters following completion of remedial activities.

California Regional Water Quality Control Board, Los Angeles Region, 1994b, Letter to Los Angeles County Fire Department, Cased Referred to Los Angeles County Fire Department, Health Haz-mat Program for Oversight of Soil Remediation at Former Graham Printing and Lithograph Site at 17475 Gale Avenue, City of Industry, California (File No. AB105.0113), February 16, 1994. Letter referring the oversight of soil remediation to the (LACFD).

ICF Kaiser Engineers, Inc. (ICF KE), 1994a, Report of Remediation of TPH-Affected Soil and Quarterly Groundwater Monitoring at the Former Graham Printing & Lithograph Facility, 17475 Gale Avenue, City of Industry, California, June 10, 1994. ICF KE manually excavated, under the direction of LACFD, the TPH-affected soils in the immediate area of the former surficial soil sample collected by TERRA TECH in 1988. Approximately 0.75 cubic yards of soil was removed and placed into containers pending offsite disposal. All soils visibly impacted with TPH were removed. One confirmation sample was collected from the base of the excavation. The soil sample was analyzed for TRPH by EPA Method 418.1 and VOCs by EPA Method 8240. TRPH was detected in the soil sample at a concentration of 300 parts per million (ppm). VOCs were not detected in the soil sample. VOCs were not detected in this soil sample.

In addition, ICF KE installed two hand auger borings to a depth of 5 feet bgs north of the remediated soil in order to further assess the accuracy of the analytical results from previous investigations. One soil sample was collected from each boring at a depth of 5 feet bgs and was analyzed for TRPH by EPA Method 418.1 and VOCs by EPA Method 8240. TRPH was

detected at concentrations of 20 and 21 ppm. On soil sample contained detectable concentrations of acetone (56 parts per billion [ppb]) and 2-butanone (14 ppb). Additional VOCs were not detected above stated detection limits in either of the soil samples.

Depth to groundwater was measured at 33.58 feet bgs. A groundwater sample was collected and analyzed for TRPH and VOCs. TRPH was not detected in the groundwater sample. 1,1-DCE and 1,1,1,2-tetrachloroethane were detected at concentrations of 74 ppb and 17 ppb, respectively. ICF KE stated that the CRWQCB recognizes that releases of these chemicals to groundwater have been documented at other offsite manufacturing facilities nearby.

ICF KE concluded that the remedial TPH objectives were achieved. TPH was detected well below the recommended clean-up level of 1,000 ppm. In addition, the soil samples collected from the hand auger soil borings were also below the cleanup level and indicated that the TPH detected in previous investigations is limited and does not extend laterally. ICF KE recommended no further action for the Site based on low detected concentrations of TRPH and VOCs, the five foot clayey layer located at 20-25 feet bgs which creates a barrier to vertical migration of chemical compounds from the Site, and the VOCs detected in groundwater are likely from nearby offsite sources.

County of Los Angeles Fire Department, Letter to RREEF Funds, Site Closure – Former Graham Printing and Lithograph Company, 17475 Gale Avenue, City of Industry, California, July 14, 1994. The letter confirms the review of the report of remediation dated June 10, 1994 and concurs that the known site contamination has been satisfactorily mitigated for the current use. No further requirements or restrictions are required at this time; however, continued groundwater monitoring and/or abandonment of the onsite monitoring well will remain under the jurisdiction of the CRWQCB. A copy of this letter has been included in Appendix E.

ICF Kaiser Engineers, Inc. (ICF KE), 1994b, Report of Quarterly Groundwater Monitoring at the Former Graham Printing and Lithography Facility, 17475 Gale Avenue, City of Industry, California, September 26, 1994. Groundwater was encountered at a depth of 34.15 feet bgs. TRPH was not detected in the water sample. 1,1-DCE, 1,1,1-TCA, and 1,1,1,2-tetrachloroethane were detected in the water sample at concentrations of 5.2 µg/L, 1.0 µg/L, and 17 µg/L, respectively.

ICF Kaiser Engineers, Inc. (ICF KE), 1994c, Letter to RWQCB regarding Groundwater Monitoring and Site Closure, Former Graham Printing and Lithography Facility, 17475 Gale Avenue, City of Industry, California, November 18, 1994. The letter summarizes a telephone conversation between ICF KE and CRWQCB which determined that the last round of groundwater sampling was completed in August 1994, and further sampling was not required by the CRWQCB at that time. In addition, the TPH affected soils were remediated to the satisfaction of the LACFD. ICF KE recommended that the onsite groundwater monitoring well be properly abandoned and the Site be closed with respect to VOCs.

California Regional Water Quality Control Board, Los Angeles Region, Letter to RREEF Funds, Well Investigation Program – No Further Action, Graham Printing Company, 17475 Gale Avenue, City of Industry, California (File No. 105.0113), January 31, 1995. The letter summarizes the previous investigations and concluded that the results of the soil remediation and groundwater monitoring completed the requirements for assessment and remediation at the subject site and no further action was required by the Well Investigation Program. The letter contains a disclaimer which states, the jurisdictional requirements of other agencies, such as the US EPA, are not affected by the CRWQCB's "no further action" determination. A copy of this letter has been included in Appendix E.

Harding Lawson Associates (HLA), Review of Environmental Documents Regarding the Former Graham Printing & Lithograph Company Site, 17475 Gale Avenue, City of Industry, California, December 10, 1996. HLA reviewed client-supplied documents to assess the potential risk of contamination on the Site. HLA concluded:

- Shallow groundwater (approximately 35 feet bgs) beneath the Site has been impacted, potentially from Graham's operations, but also potentially from other upgradient, offsite sources. The concentrations of VOCs in the groundwater have fluctuated. The concentrations of TCA in the groundwater at the Site were below the maximum contaminant level (MCL) [established by the California Department of Health Services]; however, DCE was typically slightly higher than the MCL. The CRWQCB has issued a letter of "No Further Action," indicating they believe sufficient groundwater investigation and remediation had taken place at the time the letter was issued.

- Low levels of VOCs and TRPH exist in the soil in localized areas; however, only localized areas have been surveyed and sampled. The VOC concentrations appear to be similar to, or lower in the deeper soils than in the shallow soils based on two soil gas surveys performed at the Site. Also the VOCs detected in the soils are the same as those detected in the groundwater.

- TRPH-impacted soils in the [former] compressor area have been remediated to the satisfaction of the regulatory agency (LACFD).

- The LACFD has issued a letter of "No Further Action" indicating they believe sufficient soil investigation and remediation has taken place at the time the letter was issued.

- For this Site, the appropriate guide for soil clean up of TRPH-contaminated soils would be the level set by the LACFD specifically for this Site. This level was 1,000 ppm. This level is also consistent with CRWQCB's Soil Screening Levels. As a result of

soil remediation that has taken place at the Site, the TRPH-impacted soils in the vicinity of the former compressor area are well below the limit established by the LACFD. Levels for TRPH in groundwater have not been established; however, based on HLA's experience, 4 ppm would not be of concern.

- The levels of acetone, 2-butanone, 4-methyl-2pentanone, and TCA in soils were all well below the target remediation levels established by the US EPA for industrial soils. The established levels are called Preliminary Remediation Goals (PRGs), developed by the US EPA, and combine current EPA Toxicity values with accepted exposure factors to estimate contaminant concentrations in soil that are protective of human health over a lifetime. The PRG concentrations can be used to screen pollutants in environmental media, trigger further investigation, and provide and initial cleanup goal if applicable.

- The Site is currently a potentially responsible party (PRP) in the Puente Valley Operable Unit Superfund Site. The US EPA is not convinced that the Site did not contribute to the regional groundwater contamination.

- Industrial operations utilizing hazardous materials, specifically solvents such as TCA, have taken place on the Site.

- There is evidence of the release of hazardous chemicals into two of the onsite sinks located at the north end of the building. This issue does not appear to have been investigated.

- The initial history of the Site, prior to Graham's occupancy, is incomplete. This does not allow for a complete understanding of potential sources of impact to soils or groundwater beneath the Site.

- A dense clay layer exists on the Site at between approximately 25 and 30 feet bgs. This clay layer could significantly impede the downward migration of chemicals detected in the soil.

HLA recommended that a Phase I ESA be performed, including a Chain-of-Title search, to determine if operations that took place on the Site prior to the Graham's occupancy may have impacted the Site. Based on the results of the ESA, additional soil sampling (not soil gas sampling) may be recommended if other areas of potential concern are revealed. A copy of a map provided by HLA summarizing previous soil investigations has been included in Appendix E.

United States Environmental Protection Agency, Region IX (9), Letter to Puente Valley Operable Unit Potentially Responsible Parties, Proposed Early Settlement Offer for Small Parties and Opportunity to Provide for Additional Information, Puente Valley Operable Unit, San Gabriel Valley Superfund Site, Area 4, June 27, 2000. According to the letter, the EPA is proposing to settle with 24 of the 26 small contributor PRPs. The EPA states that two of the small party contributors, RREEF West-IV Inc. (the Site) and the Dexter Corp. have negotiated settlements with a subgroup of the Puente Valley Steering Committee and therefore the EPA has not included RREEF and Dexter in the small contributor allocation and settlement proposal. A copy of this letter has been included in Appendix E.

4.3 Physical Setting Source(s)

Leighton Consulting reviewed pertinent maps and readily available literature for information on the physiography and hydrogeology of the Site. A summary of this information is presented in the following subsections.

4.3.1 Topography

The Site is located in Township 2 South, Range 10 West, Sections 15 and 16 within the City of Industry, Los Angeles County, California. Topographic map coverage of the site vicinity is provided by the United States Geological Survey (USGS) "La Habra, California" Quadrangle (1981). Evidence of structures, aboveground storage tanks (ASTs), oil wells, or water wells were not noted onsite. The elevation of the property is approximately 425 feet above mean sea level and slopes gently to the northwest.

4.3.2 Surface Water

Two unnamed creeks were depicted on the topographic map approximately 0.5 and 0.75 miles east of the Site. These creeks appear to flow into San Jose Creek which is located approximately 0.75 miles north of the Site. Surface water on the Site appears to flow towards various storm drains located onsite (see Figure 2).

4.3.3 Geology and Soils

The subject site is located in the eastern portion of the Los Angeles County Coastal Plain, which has northeast-southwest trending physiographical features and exhibits moderate topographic relief. Surficial geologic deposits noted in the area of the subject site are comprised of layered Quaternary, Recent, Great Valley, sedimentary and metasedimentary rocks. The soil observed within this zone consists of fine to medium grain sand with discontinuous areas of increasing coarse sand and gravel (ATEC, 1993c).

4.3.4 Hydrogeology

Hydrologically, the subject site is located within the eastern portion of the West Coast Basin, in the San Gabriel Groundwater Basin 4 (La Puente Area). The San Gabriel Groundwater Basin is an area of approximately 195 square miles, occupying most of the northeastern quadrant of Los Angeles County (ATEC, 1993c).

According to the most recent groundwater monitoring report prepared for the Site in 1994, depth to groundwater in the site vicinity was measured at 34.15 feet bgs (ICF KE, 1994b). The groundwater flow direction beneath the Site is assumed to be to the northwest, generally following topography.

4.3.5 Wetlands

The Site inspection did not reveal existing wetlands or any conditions, such as reeds on standing water, that would indicate the presence of a wetland on the Site. In addition, Leighton Consultings' review of the USGS topographic maps revealed no evidence of wetlands on the Site.

4.3.6 Oil and Gas Fields

Leighton Consulting reviewed the Munger Map Book, California – Alaska Oil and Gas Fields, Map W-64 (Munger, 1999). Oil or gas wells were not identified onsite. In addition, evidence of onsite oil or gas wells or oilfield-related facilities were not observed on the Site.

4.4 Historical Use Information on the Property

Leighton Consulting reviewed selected historical information on the subject property. These references were reviewed for evidence of activities which would suggest the potential presence of hazardous substances at the Site and to evaluate the potential for the Site to be impacted by offsite sources of contamination. The following paragraphs are a chronological summary of the review.

4.4.1 Aerial Photographs

Historical aerial photographs were reviewed for information regarding past Site uses. Aerial photographs were reviewed for the following years: 1928, 1938, 1947, 1953, 1960, 1965, 1975, 1979, 1987, 1993, and 1999. References are provided in Appendix A.

In the **1928** aerial photograph, the northern portion of the Site was observed to be vacant land. The southern portion of the Site is occupied by orchards. A dirt road was observed to the east and south of the Site. Railroad tracks were observed to the north of the Site. Beyond the railroad tracks to the north of the Site, orchards were observed. Small

structures, which appear to be a farmhouse, were observed to the northeast. Vacant land is present to the east. Orchards were observed to the south of the Site. Vacant land and orchards were observed to the west of the Site.

In the **1938** aerial photograph, land use changes were not observed onsite or on any surrounding properties, except that the northern portion of the Site was observed to have been cleared of vegetation.

In the **1947** aerial photograph, land use changes were not observed onsite or on any surrounding properties, except that there were less orchards (trees) observed on the southern portion of the Site. In addition, an oval track was observed to the south of the Site.

In the **1953** aerial photograph, the northern portion of the Site appears to be utilized for agricultural purposes. The remaining portion of the Site appears to be vacant except that what appears to be a concrete standpipe was observed on the southeast corner of the Site near the future Hatcher Avenue (this may actually be offsite; however, it is difficult to determine). This may be associated with the agricultural use of the site vicinity. A road, railroad, and some remaining orchards were observed to the north of the Site. A farmhouse and agricultural land were observed to the east of the Site. A track was observed to the south of the Site. The property to the west of the Site appears to be utilized for agricultural purposes.

In the **1960** aerial photograph, the Site appears to be used for agricultural purposes. A railroad easement transects the northern portion of the Site terminating at an industrial building located approximately 0.5 miles to the east-northeast of the Site. The concrete stand pipe was still located on the southeast corner of the Site. A road, railroad, and industrial buildings were observed to the north of the Site. A farmhouse, commercial/industrial building, and agricultural land was observed to the east of the Site. A track was observed to the south of the Site; however, the track appears to be deteriorating. The property to the west of the Site appears to be utilized for agricultural purposes.

In the **1965** aerial photograph, land use changes were not observed onsite or on any surrounding properties, except the 60 Freeway appears to be under development to the south of the Site.

In the **1975** aerial photograph, the Site appears to have been cleared of all vegetation. The railroad spur was still observed on the northern portion of the Site; however, the concrete stand pipe is no longer visible. Gale Avenue has been developed south of the Site and Hatcher Avenue appears under development to the east of the Site. Further south is vacant land and the 60 freeway, further east are a farmhouse and a commercial/industrial building. Adjacent to the north is vacant land, a railroad track and industrial buildings. Vacant land was observed to the west.

In the **1979** aerial photograph, the Site and adjacent property to the east and south have been developed with the present day industrial buildings. A railroad spur appears to extend from the railroad to the western portion of the subject structure. Adjacent to the north is the railroad and an industrial property. Adjacent to the east is a farmhouse and a commercial/industrial building.

In the **1987** aerial photograph, land use changes were not observed onsite or on any surrounding properties, except that the railroad spur and the farmhouse were no longer visible to the east of the Site.

In the **1993** aerial photograph, the Site and adjacent properties to the north, east, south, and southeast appear in the present day configuration. Adjacent to the northeast was vacant land.

In the **1999** aerial photograph, the Site and surrounding properties appear to be in the present day configuration.

4.4.2 Sanborn Maps

Sanborn Maps, or fire insurance maps, are detailed city plans showing building footprints, construction details, use of structure, street address, etc. The maps were designed to assist fire insurance agents in determining the degree of hazard associated with a particular property. Sanborn Maps were produced from approximately 1867 to the present for commercial, industrial, and residential sections of approximately 12,000 cities and towns in the United States. Gradient searched for Sanborn Maps for the City of Industry online through the Los Angeles Public Library; however, it does not appear that Sanborn Maps have been published for the City of Industry. Therefore, there was no coverage of the subject site.

4.4.3 Historical Topographic Maps

Historical topographic maps were reviewed for information regarding past Site uses. Topographic map coverage of the site vicinity is provided by the "La Habra" Quadrangle (1964, 1964 photorevised 1972, 1964 photorevised 1981). References are provided in Appendix A.

1964: Structures, tanks or wells were not depicted onsite. The railroad spur observed in aerial photographs to transect the northern portion of the Site was depicted on the topographic map. The railroad tracks were observed to the north of the Site. The commercial/industrial structure and smaller structures were observed to the east of the Site. Additional structures were not observed on any surrounding properties.

1972: Land use changes were not observed on the Site or surrounding properties except that the 60 Freeway was not depicted to the south of the Site.

1981: Land use changes were not observed on the Site or surrounding properties except that Gale Avenue is now developed to the south of the Site and the adjacent building to the west of the Site is now visible.

4.4.4 Historical City Directories

Historical City directories were not reviewed as a part of this assessment.

4.4.5 Additional Resources

On June 10, 2003, Leighton Consulting reviewed building permits at the Los Angeles County Department of Building and Safety. Records were not found for 17245 Gale Avenue or 1201 or 1239 Hatcher Avenue. Records were found for 17475-89 Gale Avenue. According to the information reviewed, the subject structure was constructed as an industrial building in 1979 for Zelman Development. A certificate of occupancy was issued in 1978 for "Gale Avenue Building." Graham Printing was issued a plumbing permit in 1985. In 1997 two building permits were issued to Amptron International Inc. for tenant improvements and a certificate of occupancy.

According to the report prepared by HLA in 1996, HLA reviewed a document entitled "Outline Specifications Interior Improvements in Existing Industrial Building" dated 1979 which was prepared for The Coleman Co. HLA indicates that Coleman, possibly Coleman Air Conditioning, was likely a tenant of the Site from approximately 1978 and 1984. In addition, during the late 1980s to early 1990s, the southern portion of the Site was occupied by Han Ton Sock Co., a clothing importing business and wholesale distributor which used the Site as a warehouse (HLA, 1996).

Graham Printing and Lithograph Company operated color lithographic offset presses, die cutting presses, coating machines, associated pressing equipment, prefolding straight-lines gluers, baling machines, and two thermal unit heaters for wax coating of food containers. The presses reportedly used water-based coatings containing ammonia and were cleaned with 1,1,1-TCA (HLA, 1996). In 1993, Graham had filed for bankruptcy and vacated the Site (ATEC, 1993c).

4.4.6 Summary of Historical Land Use

Based on historical records, land usage is summarized as follows:

Time Period	Land Usage	Reference
Prior to 1928	Unknown	None available
1928 to approximately 1953	Vacant land	Aerial Photographs
1953 to approximately 1960	Agricultural	Aerial Photographs
1960 to approximately 1975	Agricultural Railroad spur (northern portion of the Site)	Aerial Photographs Topographic Maps
1975 to approximately 1979	Vacant land Railroad spur (northern portion of the Site)	Aerial Photographs Topographic Maps
1979 to approximately 1987	Industrial building possibly occupied by Coleman Co. Railroad spur (western portion of the Site)	Previous Reports Aerial Photographs Building Permits
1984 to approximately 1988	Industrial building occupied by Graham Printing and Lithograph Co.	Previous Reports Aerial Photographs
1988 to approximately 1997	Industrial building occupied by tenants such as Han Ton Sock Co.	Previous Reports Aerial Photographs
1997 to present	Industrial building occupied by Amptron International Inc.	Building Permits Site Reconnaissance

5.0 SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

On June 10, 2003, Kristin Stout, a representative of Leighton Consulting, conducted a reconnaissance–level assessment of the Site. The site reconnaissance consisted of the observation and documentation of existing site conditions and nature of the neighboring property development within ¼ mile of the Site. Photographs of the Site are presented in Appendix B and their view directions are noted on Figure 2. Items noted during the site reconnaissance are also noted on Figure 2.

5.2 General Site Setting

The Site is located at the northwest corner of Gale Avenue and Hatcher Avenue within the City of Industry, California (Figure 1). The County of Los Angeles Assessor's office designates the Site as APNs 8264-001-120 and 8264-001-127. The legal description for APN 8264-001-120 is listed as P M 81-28 THAT POR IN TRA 8253 OF LOT 1 and the legal description of APN 8264-001-127 is listed as P M 81-28 VAC ST ADJ ON NE AND THAT POR IN TRA 8267 OF LOT 1. Several addresses were found to be associated with the Site through interviews with the current occupant and review of previous reports: 17245, 17475, and 17489 Gale Avenue and 1201 and 1239 Hatcher Avenue.

The Site currently consists of an approximate 107,000 square foot concrete tilt-up warehouse/industrial building constructed in 1978. A parking lot surrounds the facility.

The Site is currently occupied by Amptron International Inc. who utilizes the Site for office space, storage, and assembly of computer components (Photos 1 through 3, Appendix B). According to Mr. Leon Hsiao, President and CEO of Amptron International Inc., the Site was vacant for approximately 3 to 5 years prior to their occupancy. The southern portion of the building is currently vacant (Photo 4, Appendix B). Previous known occupants of the building include The Coleman Co., Graham Printing and Lithograph Company, and Han Ton Sock Co.

Puente Hills Ford utilizes the southern parking lot as a place to store their vehicles.

5.3 Exterior and Interior Observations

5.3.1 Hazardous Substances, Drums, and Other Chemical Containers

Storage of hazardous or regulated substance containers was observed on the Site. Two 55-gallon drums of naphtha were observed in a storage area in the northwest corner of the Site (Photo 5, Appendix B). Staining was not observed beneath these drums.

In addition, two 1-gallon containers of Rosin Flux and one 1-gallon container of Soldering Flux were observed in this area (Photo 6, Appendix B). Staining was not observed beneath these containers. These materials were observed near what appeared to be a "make-shift" soldering area.

The previous occupant, Graham Printing and Lithograph Company, utilized many different chemicals onsite. See Appendix E for a listing of these chemicals.

5.3.2 Storage Tanks

Evidence of USTs (such as vent lines, fill, or overfill ports) and ASTs were not observed on the Site.

5.3.3 Polychlorinated Biphenyls (PCBs)

Visual evidence of PCBs was not observed onsite. However, one pad-mounted transformer was observed to the east of the structure and approximately four smaller transformers were observed within the structure. One of the smaller transformers was labeled "dry-type". Staining was not observed beneath any of these transformers.

5.3.4 Waste Disposal

Trash generated at the Site is removed offsite by a disposal contractor, City of Industry Disposal Company.

5.3.5 Dumping

Evidence of waste dumping was not observed onsite.

5.3.6 Pits, Ponds, Lagoons, Septic Systems, Wastewater, Drains, Cisterns, and Sumps

Evidence of pits, ponds, lagoons, wastewater, sumps, drains, cisterns, and septic systems was not observed at the Site. Storm drains were observed onsite and these are noted on Figure 2. Former drains and sinks were located within the subject structure as identified on HLA's 1996 figure. A copy of this figure has been provided in Appendix E.

5.3.7 Pesticide Use

Pesticides were not observed onsite. The reported past agricultural use suggests that pesticides may have been used at the site in the past. However, the site has been graded and developed into an industrial building. Therefore, the potential former use of pesticides onsite is not considered a recognized environmental condition.

5.3.8 Staining and Discolored Soils

Evidence of staining and discolored soils was not observed onsite.

5.3.9 Stressed Vegetation

Stressed vegetation was not observed onsite.

5.3.10 Unusual Odors

Unusual odors were not detected onsite.

5.3.11 Onsite Wells

Oil or gas production wells were not observed or reported at or adjacent to the Site. One groundwater monitoring well was formerly located in the northwest corner of the Site. This well was not observed onsite during the site reconnaissance; however record of its abandonment was not found during the Phase I ESA. It is not known if the well was properly abandoned.

5.3.12 Asbestos

An asbestos survey was not performed as part of this investigation. Previous limited asbestos surveys were conducted onsite (see Section 4.2). Floor tile within the structure was previously noted to contain asbestos. Due to the age of the building, it is possible that additional asbestos-containing building materials are present in the structure. A thorough asbestos survey should be completed prior to any demolition or remodeling activities.

5.3.13 Lead-Based Paint

A lead-based paint survey was not performed as part of this investigation. Due to the age of the building, it is possible that lead-based paint is present in the structure. A lead-based paint survey should be completed prior to any demolition or remodeling activities.

5.3.14 Other Observations

A railroad spur was formerly located on the eastern portion of the Site. This railroad spur is no longer visible (Photo 7, Appendix B). A compressor was observed in this area. Staining was not observed beneath the compressor.

A concrete patch was observed within the structure (Photo 8, Appendix B). This may be the former location of heavy equipment associated with former site occupants.

Asphalt patches were observed in the parking area in the northern portion of the Site (Photo 9, Appendix B). According to Mr. Stone Liu, an employee onsite, this was a repair to the asphalt conducted because the original grade of the parking lot had settled and damaged the asphalt.

Evidence of recent soil borings were observed onsite (Photo 10, Appendix B). Mr. Hsaio did not know why the borings had been drilled.

6.0 INTERVIEWS

Leighton Consulting conducted interviews with persons having knowledge of current or past Site usage. Interviews were conducted either orally or in the form of a written questionnaire. Written responses are included as Appendix D.

6.1 Interview with Owner

Leighton Consulting interviewed Mr. Leon Hsiao, President and CEO of Amptron International Inc. and Manager of ICUE Holdings, LLC who is the present owner of the Site. According to Mr. Hsiao, ICUE has owned the facility since March 2000. Amptron International Inc. owned the Site from approximately February 1997 to March 2000. RREEF West-VI, Inc. was the former owner of the Site who owned the facility for approximately 10 years. Mr. Hsiao stated that the structure had been vacant for approximately 3 to 5 years prior to Amptron's occupation of the Site. Mr. Hsiao noted the presence of two storm drains located onsite. In addition, he noted to refer to all documents provided to the city. A review of these documents has been summarized in Section 4.2.

6.2 Interview with Site/Property Manager

Leighton Consulting interviewed the property manager. See Section 6.1

6.3 Interviews with Occupants

Leighton Consulting interviewed an occupant of the Site. See Section 6.1.

6.4 Interviews with Local Government Officials

Leighton Consulting did not interview employees with local government agencies to request information regarding historic and current uses of the Site with the exception of those noted in Section 4.2.

6.5 Interviews with Others

Leighton Consulting did not conduct any other interviews for this Phase I ESA.

7.0 FINDINGS

Leighton Consulting performed a Phase I ESA of the property located at of the property located at the northwest corner of Gale Avenue and Hatcher Avenue, Assessor Parcel Numbers (APNs) 8264-001-120 and 8264-001-127, City of Industry, Los Angeles County, California.

7.1 Onsite

Historically, the Site was utilized as vacant land, agricultural land, and a railroad spur.

The reported past agricultural use suggests that pesticides may have been used at the site in the past. However, the site has been graded and developed with an industrial building. Therefore, the potential former use of pesticides onsite is not considered a recognized environmental condition.

The Site was formerly occupied by Graham Printing and Lithograph Company which has documented releases to the soil.

The shallow groundwater beneath the Site has been impacted, potentially from Graham Printing and Lithographic Company, but also potentially from other upgradient, offsite sources. Low levels of VOCs and petroleum hydrocarbons have been identified in the soil. The concentrations of VOCs identified in the soil and groundwater are below industrial PRGs established by the US EPA. Petroleum hydrocarbon impacted soil in the vicinity of the former compressor area has been remediated (disposed of offsite). The Site has been issued regulatory closure letters by the CRWQCB and LACFD (copies of these letters have been provided in Appendix E).

The Site is located within an area of regional groundwater contamination. The groundwater is contaminated with TCE and PCE. The Site has been identified as a contributor (PRP) to this regional groundwater contamination and has negotiated a settlement with the Puente Valley Steering Committee (see Appendix E). If dewatering is to occur during future construction activities, the groundwater may require treatment prior to discharge.

According to previous environmental reports, a dense layer of clay exists on the Site at depths between 25 and 30 feet bgs.

One groundwater monitoring well was formerly located in the northwest corner of the Site. This well was not observed onsite during the site reconnaissance; however record of its abandonment was not found during the Phase I ESA. It is not known if the well was properly abandoned.

An asbestos or lead survey was not performed as part of this investigation. Previous limited asbestos surveys were conducted onsite (see Section 4.2). Floor tile within the structure was previously noted to contain asbestos. Due to the age of the building, it is possible that additional asbestos-containing building materials or lead based paint are present in the structure. A thorough asbestos and lead survey should be completed prior to any demolition or remodeling activities.

7.2 Offsite

An environmental database report prepared by FirstSearch was reviewed for local, state, and federal listings for properties within the site vicinity. Regulatory database lists were reviewed for cases pertaining to leaking USTs and ASTs, hazardous waste sites, and abandoned sites within the specified radii of standards established by the ASTM. The FirstSearch report did not identify any nearby facilities which appear to represent a potential source of migration of hazardous substances to soil or groundwater beneath the Site, with the exception of the regional groundwater contamination described in Section 7.1.

The CRWQCB has noted that releases of VOCs have been documented at other offsite manufacturing facilities near the Site.

8.0 CONCLUSIONS AND RECOMMENDATIONS

Leighton Consulting performed a Phase I ESA for the Site in conformance with the scope and limitations of ASTM Practice E1527-00. Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following:

- Releases of contaminants of concern have been documented at the site. Although regulatory "no further action" letters have been issued, contaminated soils are still present in the subsurface.

- The Site is located in an area of regional groundwater contamination, specifically the San Gabriel Valley Superfund Area 4 (Puente Valley Operable Unit). The groundwater beneath the Site is contaminated with TCE and PCE. The Site has been identified as a contributor (PRP) to this regional groundwater contamination and has negotiated a settlement with the Puente Valley Steering Committee.

- An asbestos or lead survey was not performed as part of this investigation. Previous limited asbestos surveys were conducted onsite (see Section 4.2). Floor tile within the structure was previously noted to contain asbestos. Due to the age of the building, it is possible that additional asbestos-containing building materials or lead based paint are present in the structure.

- A monitoring well was formerly located onsite. No documentation has been found that indicates that this well has been properly abandoned.

Based upon the findings of this Phase I ESA, Leighton Consulting recommends:

- In the event that the monitoring well has not been properly abandoned, it is recommended that the well be properly abandoned in accordance with current regulatory guidelines.

- There is no current need for further assessment of the contaminated soil and groundwater in the subsurface, as regulatory "no further action" letters have been issued for the Site. If further construction activities are conducted in the subsurface, an analysis of the soil should be conducted in regard to construction worker health and safety issues. All excavated soil should be profiled prior to disposal.

- Prior to demolition or renovation of the site building, a comprehensive asbestos survey and lead-based paint survey should be performed. If asbestos or lead-based paint is found in the building materials that will be disturbed by the demolition/renovation activities, the material should be abated by a qualified contractor under current local, state and federal regulations.

- In general, observations should be made during any future site development for areas of possible contamination such as, but not limited to, the presence of underground facilities, buried debris, waste drums, tanks, staining soil or odorous soils. Should such materials be encountered, further investigation and analysis may be necessary at that time.

9.0 DEVIATIONS

Leighton Consulting did not deviate from or alter the scope of work, as defined in Section 1.3 of this report, in any way.

10.0 ADDITIONAL SERVICES

Leighton Consulting did not perform any work outside the scope of work as defined in Section 1.3 of this report.

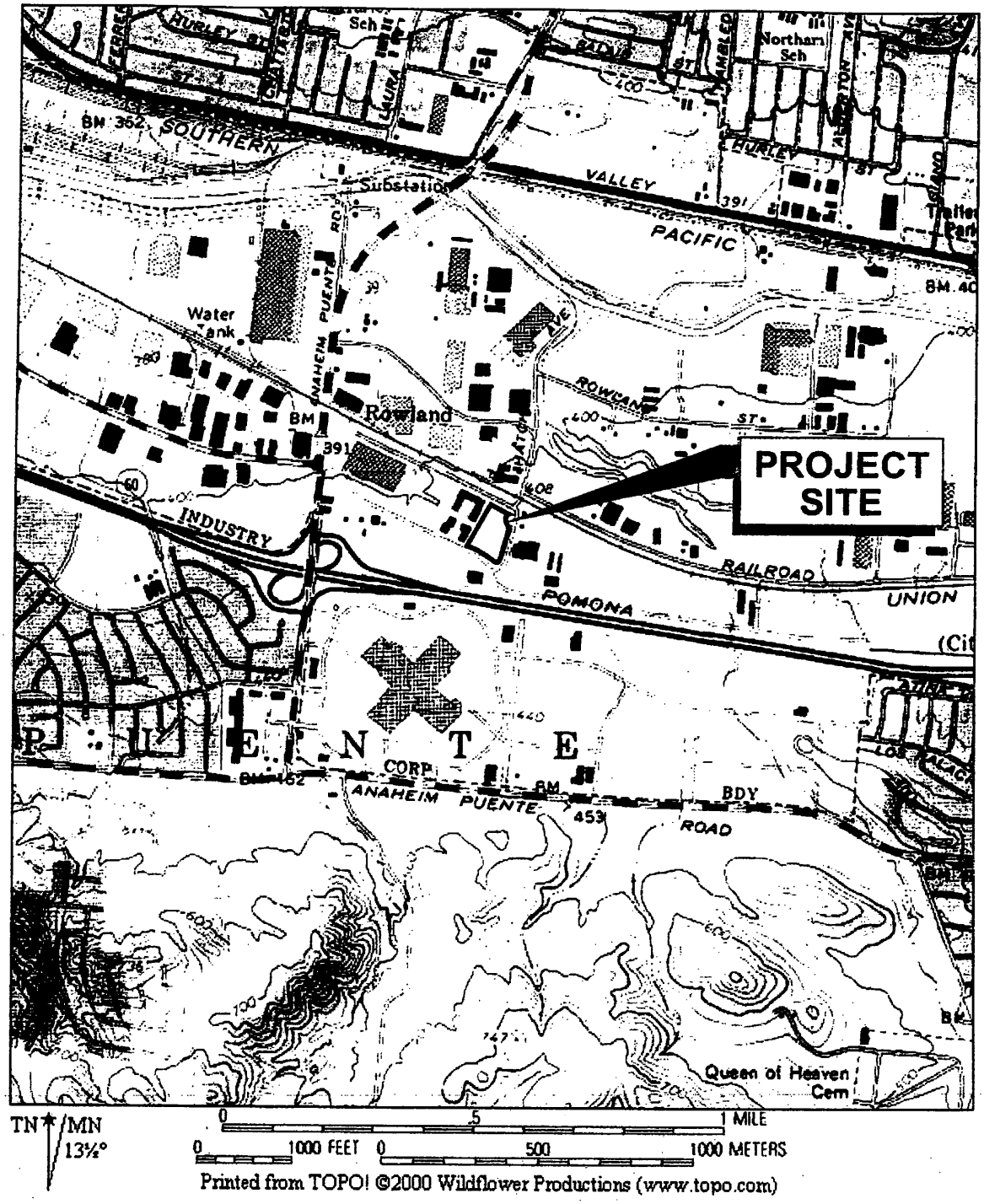
11.0 QUALIFICATIONS

11.1 Corporate

Leighton Group, Inc. is the parent firm for three firms, of which Leighton Consulting, Inc. is one. The other two firms are Leighton and Associates, Inc. and Teratest Labs, Inc. Leighton Consulting provides professional services in environmental engineering that involves the application of science and engineering to environmental compliance, contamination assessment and cleanup, and the management of hazardous, solid and industrial waste. Phase I Environmental Site Assessments are a part of this practice area and have been conducted by Leighton Consulting.

11.2 Individual

The qualifications of the Project Manager and the other Gradient environmental professionals involved in this Phase I ESA meet the Gradient corporate requirements for performing Phase I ESAs. In addition, Kristin Stout is a Registered Environmental Assessor I (REA I) and Mike Cassidy is a Registered Geologist in the State of California.



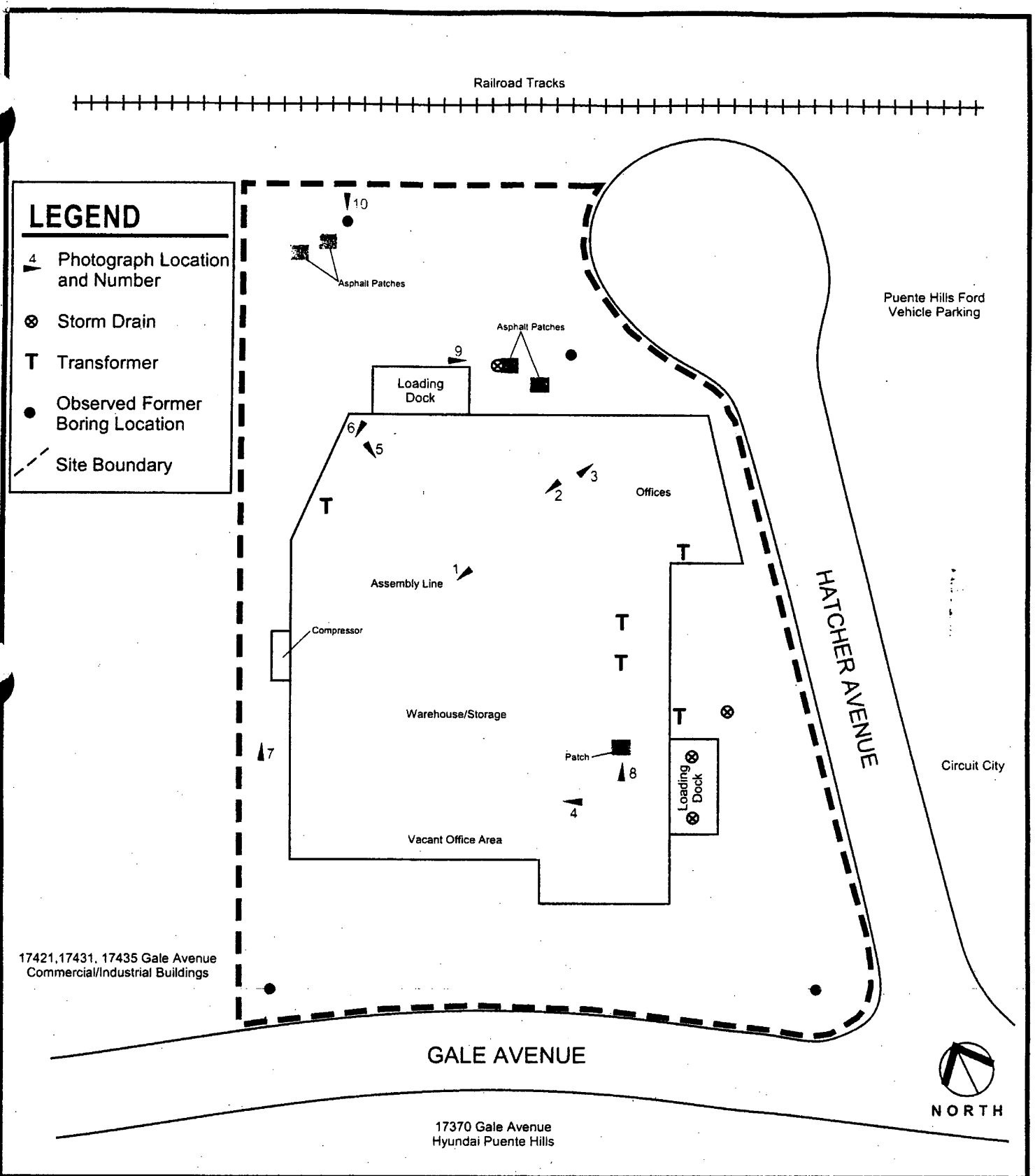
SITE LOCATION MAP
Northwest Corner of Gale Avenue
and Hatcher Avenue
City of Industry, California

Leighton Consulting, Inc.
A LEIGHTON GROUP COMPANY

Project No.
600016-018

Date
June 2003

Figure 1



SITE PLAN
Northwest Corner of Gale Avenue and Hatcher Avenue
City of Industry, California

Leighton Consulting, Inc.
A LEIGHTON GROUP COMPANY

PROJECT NO.	600016-018
SCALE	Not to Scale
ENGR./GEOL.	KAS
DRAFTED BY	HCB
DATE	June 2003

Figure 2