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Review of Environmental Documents Regarding the Former Graham Printing & Lithograph Company Site 17475 Gale Avenue City of Industry, California

Dear Mr. Wang:

Harding Lawson Associates (HLA) was retained by Amptron International, Inc. (Amptron) to assess the potential risk of contamination on a parcel located at 17475 Gale Avenue, City of Industry, California (Site). It is HLA's understanding that Amptron is considering the purchase of this Site from the current owner, RREEF West-VI, Inc. (RREEF). Only the information provided to HLA by Amptron and RREEF was reviewed and was used in the assessment contained herein. A map of the Site has been prepared by HLA based on Site maps and soil data reviewed in the documents (refer to Attachment A). A bibliography of the documents reviewed is provided as Attachment B.

BACKGROUND

Site Description

The Site is located at 17475 Gale Avenue (and also had the address 1201 Hatcher Avenue) in a commercial/industrial area in the City of Industry, California. The Site currently consists of one approximately 107,000-square-foot warehouse/industrial building. The Site is bordered by Hatcher Avenue to the east and Gale Avenue to the south. A Union Pacific Railroad track borders the Site to the north, and a spur from this track runs along the west side of the Site. The asphalt at the Site appeared to be weathered (e.g., cracks and aggregate were observed) at the time of HLA's Site visit. The Site is currently owned by RREEF as a result of a bankruptcy by the tenant, Graham Printing & Lithograph (Graham) in 1993.

Based on asbestos surveys performed in 1993 by ATEC and in 1995 by Hygienetics, the building has asbestos-containing materials in floor tile and associated mastic (2,540 square feet) and roofing tar sealant (700 square feet).

Occupancy of the Site

According to a Phase I Environmental Site Assessment (ESA) draft report (ATEC, 1993c), the Site was first developed in 1978 and was occupied by only one former tenant, Graham. According to the ESA, Graham's first record of occupancy was in 1985. However, other reports indicated that Coleman (either Coleman Air Conditioning or Coleman Lanterns) occupied the Site from 1978 to 1985. A document entitled *Outline Specifications Interior Improvements in Existing Industrial Building*, dated July 1979 and prepared for The Coleman Co., was reviewed as part of HLA's assessment. This document further indicates that Coleman (Lanterns) may have occupied the Site prior to Graham.

Since the improvements were for an *existing* industrial building, there is a possibility that another tenant occupied the Site prior to Coleman. The improvements appeared to be for a warehousing operation; however, there was no available information on facility operations during Coleman's presumed occupancy of the Site.

An Assignment of Lease indicates that in 1987, Graham transferred all of its rights, title, and interest as a lessee of the Site to Ban-Pro of California, Inc. The Assignment of Lease indicated that the lease for the Site was signed by Graham in 1984 and the lessor was Prudential Insurance Company of America. This information, coupled with the information above, indicates a gap in the ESA's assessment of the occupancy of the Site (and therefore operations that took place on the Site) from 1978 to 1984. Although, Coleman was likely a tenant of the Site during this period, no records have been obtained or were available for review regarding the type of operations took place under Coleman's occupancy. Further, according to an ICF Kaiser report, property managers for the Site indicated that the Site was initially owned by Coleman Air Conditioning (which reportedly operated a showroom) for an unknown number of years before Graham occupied the Site. During the late 1980s to early 1990s, the south portion of the Site was occupied by Han Ton Sock Co., a clothing importing business and wholesale distributor, which used the space as a warehouse. The lack of information on the initial occupancy of the Site and the associated operations makes it difficult to assess the potential for environmental concern resulting from such occupancy.

As part of ATEC's ESA, documents were requested from the County of Los Angeles Department of Public Works (LADPW), South Coast Air Quality Management District (SCAQMD), and other agencies. The records were still outstanding when the ESA was drafted. The ESA indicated that the Site was listed as a small-quantity generator of hazardous waste on the state database of hazardous waste generators.

Graham's Operations

According to the records reviewed, Graham operated a commercial printing and lithography business. A Dun and Bradstreet (D&B) report indicates that Graham was involved in the manufacture of folding paper boxes and pressure-sensitive labels. Graham operated color lithographic offset presses, die cutting presses, coating machines, associated pressing equipment, prefolding straight-lined gluers, baling machines, and two 300,000-British thermal unit (BTU) heaters for wax coating of food containers. The presses reportedly used water-based coatings containing ammonia and were cleaned with 1,1,1-trichloroethane (TCA). According to the D&B report, the business started in November 1983.

At the time of the ESA, Graham had filed for bankruptcy, vacated the Site, and abandoned over 225 full, partially full, or empty chemical containers at the Site; therefore, most information reviewed for the ESA was for the period after Graham had ceased operations and all equipment was removed from the Site. According to the ESA, the hazardous materials/wastes were removed by ATEC in July 1993. Releases had apparently occurred on the Site for a period of 7 to 15 years. Several areas of concern were noted, including the outside drum storage area, compressor area, indoor chemical storage area, printing press area, and fume hood area. Evidence of hazardous chemical releases were reported in the ESA based on significant staining in the sink and surrounding area and in two of the onsite sinks

located at the north end of the building. The ESA stated that chemical usage in the area included materials such as solvents, inks, and cleaners. Based on HLA's Site visit, the floor drain near the printing press area and the storm drain outside on the north side of the building are also potential areas of concern.

A 1987 hazardous materials inspection for RREEF by J.M. Cohen, Inc. documented several features that Graham utilized during its operation at the Site: a plate room that used fixers and developers, an outdoor ink storage area (caged), a small maintenance shop, and an outdoor metal storage shed. The inspection also noted that a spill from a 55-gallon drum of aqueous gloss coating occurred at the Site. The spill reached the river bed (railroad track area) behind the property and flowed into the storm drain. Graham cleaned the river bed and blocked off the drain. The inspection revealed some spillage of oily material on the ground.

The following chemicals are known to have been used at the Site:

- TCA
- Isopropyl, ethyl, and methyl alcohols
- Hexane
- Alphatic and aromatic petroleum distillates
- Ethylene glycol
- 2-butoxy ethanol
- Ammonia
- Vinyl acetate
- Stoddard solvent
- Other acid and alcohol-based chemicals used as cleaners, adhesives, developers, and fixers in printing operations

SOIL AND GROUNDWATER INVESTIGATIONS

Investigations took place on the Site from 1988 to 1994 and detected the following primary constituents in the soil and groundwater: petroleum hydrocarbons, acetone, 2-butanone (MEK), TCA, and 4-methyl-2-pentanone (MIBK). Groundwater also contained 1,1-dichloroethane (1,1-DCA), a breakdown product of TCA.

The soil conditions at the Site consist of predominantly clays and silty clays. A sand/gravel layer reportedly exists from 10 to 20 feet bgs, and silty clays and clayey silts comprise the soils from 20 to 42 feet bgs. Depth to the first saturated zone is approximately 35.5 feet bgs. Further, based on a cone penetrometer test (CPT) survey performed in December 1994 (ICF Kaiser, 1994i) to assess the soil lithology beneath the Site, interbedded silts and clays appear to be continuous across the Site.

The lead regulatory agencies with oversight for cleanup of the soil and groundwater contamination have been the California Regional Water Quality Control Board-Los Angeles Region (RWQCB) and the Los Angeles County Fire Department (LACFD).

Soil Contamination

A soil investigation at the Site by Terra Tech in 1988 included the drilling of six borings (SB-1 through SB-6) in two outside areas: the former drum storage area and the former compressor area. The maximum concentrations detected were as follows: total recoverable petroleum hydrocarbons (TRPH) (180,000 parts per million [ppm]), acetone (370 parts per billion [ppb]), MEK (170 ppb), 4-methyl-2-pentanone (240 ppb), and TCA (50 ppb). The 180,000 ppm TRPH sample was a composite surface sample collected near the compressor area; all others were soil boring samples collected between 5 to 10 feet below ground surface (bgs). No deeper samples were collected. The TRPH contamination appeared to be primarily in the compressor area, whereas the volatile organic compounds (VOCs) appeared to be both in the drum storage area and, to a lesser extent, in the compressor area.

A second soil investigation, performed by ATEC in November 1992, revealed TCA at a depth of 20 feet bgs at a concentration of 23 ppb in the center of the former drum storage area (SB-7). 1,1-Dichloroethene (DCE) was detected at a concentration of 44 ppb in the same sample. The deeper and shallower samples from this boring had lower concentrations. The depth at which the contaminants were detected is at the base of the sand layer above the underlying clay.

In October 1993, at the request of the RWQCB, a soil-gas survey was performed by ICF Kaiser at the Site. A total of 45 soil-gas samples were collected from shallow depths at 34 locations. The sampling locations were selected based on potential areas of concern from Graham's known operations. A non-biased comprehensive soil-gas survey was not performed across the Site to determine the potential presence of previously unidentified concern areas. The results indicated the presence of low concentrations of TCA, DCE, tetrachloroethene (PCE), and trichloroethene (TCE) in the soil-gas samples. TCA, DCE, PCE, and TCE were detected above their reporting limits in 27, 11, 7, and 3 samples, respectively. The maximum concentrations detected outside the building were 198 ppb for TCA, 95.8 ppb for DCE, 2.5 ppb for PCE, and 0.6 ppb for TCE. The maximum concentrations detected inside the building were 164 ppb for TCA, 1.1 ppb for DCE, and 2.4 ppb for PCE (ICF Kaiser, 1993i). The detectable contaminants were centered in two areas: outside near the former drum storage area and inside near the printing press area. The deeper samples (12 feet bgs indoor and 7 feet bgs outdoor) typically had higher concentrations of TCA in the former drum storage area and DCE in both the drum storage area and the former printing press area than the shallow samples (5 feet bgs indoor and 0 feet bgs outdoor).

A limited supplemental soil-gas survey was performed 2 months after the first survey in the former drum storage area and the former printing press area. The survey was requested by the RWQCB to ensure that higher concentrations of VOCs did not occur at depth in these areas. One probe was installed in each area; samples were collected at 18 and 23 feet bgs in the former drum storage area and at 25 feet bgs in the former printing press area. Sampling probe refusals were met at 25 feet bgs due to the dense clay layer. The results of the deeper samples indicated similar or lower concentration of VOCs at depth (ICF Kaiser, 1993j).

In April 1994, ICF Kaiser conducted remediation of TRPH-impacted soils in the compressor area, as directed by the LACFD. Approximately 0.75 cubic yard of soils was removed, and confirmation sampling was performed at the base of the excavation to confirm that remaining soils had TRPH

concentrations below the cleanup level of 1,000 ppm, as agreed upon by the LACFD and ICF Kaiser. Additionally, two soil borings were hand-augered to a depth of 5 feet bgs near the boring that previously had the highest TRPH concentrations to assess the lateral extent of contamination. Both borings had low levels of TRPH below the cleanup level (ICF Kaiser, 1994f).

Groundwater Contamination

As a result of the 1988 soil investigation, the RWQCB required a monitoring well to be installed downgradient of the impacted area on the Site. Based on recommendations by the RWQCB, the well was installed 30 to 40 feet northwest of the chemical waste storage area in September 1989. Two soil samples (from 1 foot and 41.5 feet bgs) were collected from the well boring, and one water sample was collected from the well once it had been completed and had stabilized. VOCs were not detected in any of the samples. The RWQCB sent a letter to Graham in March 1990 indicating the well was improperly designed, resulting in high turbidity and solids in the water samples; therefore, specific requirements were placed on all sampling and monitoring events from this well. The subsequent sampling events are summarized below in chronological order:

- January 1991 - indicated the presence of TRPH (4 ppm), DCE (7.5 ppb), TCA (4.4 ppb), and xylene (1.4 ppb).
- May 1991 - did not detect any VOCs; however, low levels of TRPH were detected (0.7 ppm).
- January 1993 - the following contaminants were present: DCE (21 ppb), TCA (6 ppb), toluene (0.4 ppb).
- December 1993 - the following contaminants were present: DCE (120 ppb) and TCA (21 ppb). The DCE concentration exceeds the California Maximum Contaminant Level (MCL) for groundwater of 6 ppb. The MCL for TCA is 200 ppb.
- April 1994 - the following contaminants were present: DCE (74 ppb) and TCA (17 ppb).

The data above indicate that there have been significant fluctuations in the groundwater sampling results, as well as initial problems regarding improper well design. Based on the sampling conducted to date, except for DCE, the concentrations of contaminants detected have been lower than the MCLs.

Site Closure for Soil and Groundwater Contamination

Three closure letters have been issued for the activities that have occurred at the Site: two from the RWQCB and one from the LACFD. Site closure letters issued by regulatory agencies typically indicate that they have agreed with the methods used in the investigations at a site and believe that *for the issue for which closure is granted*, there is generally no further required action to be taken on part of the property owner. Closure letters do not relieve the site owners of any future liability. If new information regarding additional contamination on a site is uncovered, the agencies retain their right to require further investigations and/or remediation.

The following closure letters have been received by RREEF regarding the Site:

- February 16, 1994 - No further action concerning VOC-guided soil remediation was granted by the RWQCB. Based on data from the soil boring investigations and soil-gas surveys provided to the RWQCB, the RWQCB did not require VOC-guided soil remediation at the Site. The RWQCB referred the case to the LACFD for oversight of remediation activities/soil cleanup for the elevated-TRPH soils. The RWQCB did, however, require quarterly groundwater monitoring during the TRPH soil cleanup and for a period of two quarters following the cleanup. As typical for this type of letter, the RWQCB indicated that if contrary information arises in the future, the RWQCB has the option of ordering additional investigations or taking other actions as deemed appropriate.

- July 14, 1994 - Site closure for remediation of the TRPH-impacted soils was granted by the LACFD. The LACFD indicated it concurred with ICF Kaiser, through a review of the *Report of Remediation of the TRPH-Affected Soil and Quarterly Groundwater Monitoring* that the known site contamination had been satisfactorily mitigated for the current use.

- January 31, 1995 - A no further action letter was issued to RREEF by the RWQCB regarding the Well Investigation Program. Based on the investigation performed at that time, the results of the soil remediation and groundwater monitoring completed the RWQCB's requirements for assessment and remediation at the subject Site; therefore, the RWQCB had no further requirements regarding the Well Investigation Program.

PRP STATUS WITH THE PUENTE OPERABLE UNIT SUPERFUND SITE

In May 1993, RREEF received a General Notice letter from the United States Environmental Protection Agency (USEPA) and on May 26, 1993, USEPA sent RREEF a Special Notice letter notifying RREEF under Section 122(e) of CERCLA.

A confidential offer of settlement was sent to Mr. Mark Klaiman, USEPA Office of Regional Counsel, March 29, 1994, by Mr. Gene Lucero of Latham & Watkins on behalf of RREEF. The settlement offer was for a *de micromis* settlement. RREEF had initially sought a *de minimis* settlement from USEPA at the remedial investigation/feasibility study (RI/FS) stage, but it then joined the Puente Valley Steering Committee and signed the Administrative Order on Consent governing the RI/FS. The USEPA replied that Latham & Watkins' assertion that RREEF was a small contributor to the contamination at the Puente Valley Operable Unit was debatable. The USEPA did not allow for a *de micromis* settlement.

CONCLUSIONS AND RECOMMENDATIONS

Based on HLA's review of the documents provided by Amptron and RREEF, the following conclusions can be made regarding the Site:

- 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 MCL; however, DCE was typically slightly higher than its MCL. The RWQCB 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 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 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 the RWQCB'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-2-pentanone, and TCA in the soils were all well below the target remediation levels established by the USEPA for industrial soils. The established levels are called Preliminary Remediation Goals (PRGs), developed by USEPA, 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 an initial cleanup goal if applicable.

- The Site is currently a potentially responsible party (PRP) in the Puente Valley Operable Unit Superfund Site. The USEPA 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 at the Site.

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

HLA recommends the following course of action to determine if the Site has been impacted by former operations adjacent to and on the Site:

- Perform a Phase I ESA for the Site, including a chain-of-title, to determine if operations that took place on the Site prior to the Graham's occupancy may have impacted the Site. The historical aerial photograph review performed as part of this assessment should assist in the understanding of previous operations. Based on the results of the ESA, additionally soil sampling (not soil gas sampling) may be recommended if other areas of potential concern are revealed.

HLA appreciates the opportunity to provide environmental consulting services to Amptron. We look forward to working with you on future assignments. Please feel free to call either of the undersigned if you have any questions or need additional information.

Yours very truly,

HARDING LAWSON ASSOCIATES

Stephanie Powell
Project Geologist

Ted A. Koelsch, Ph.D., R.G.
Consulting Principal

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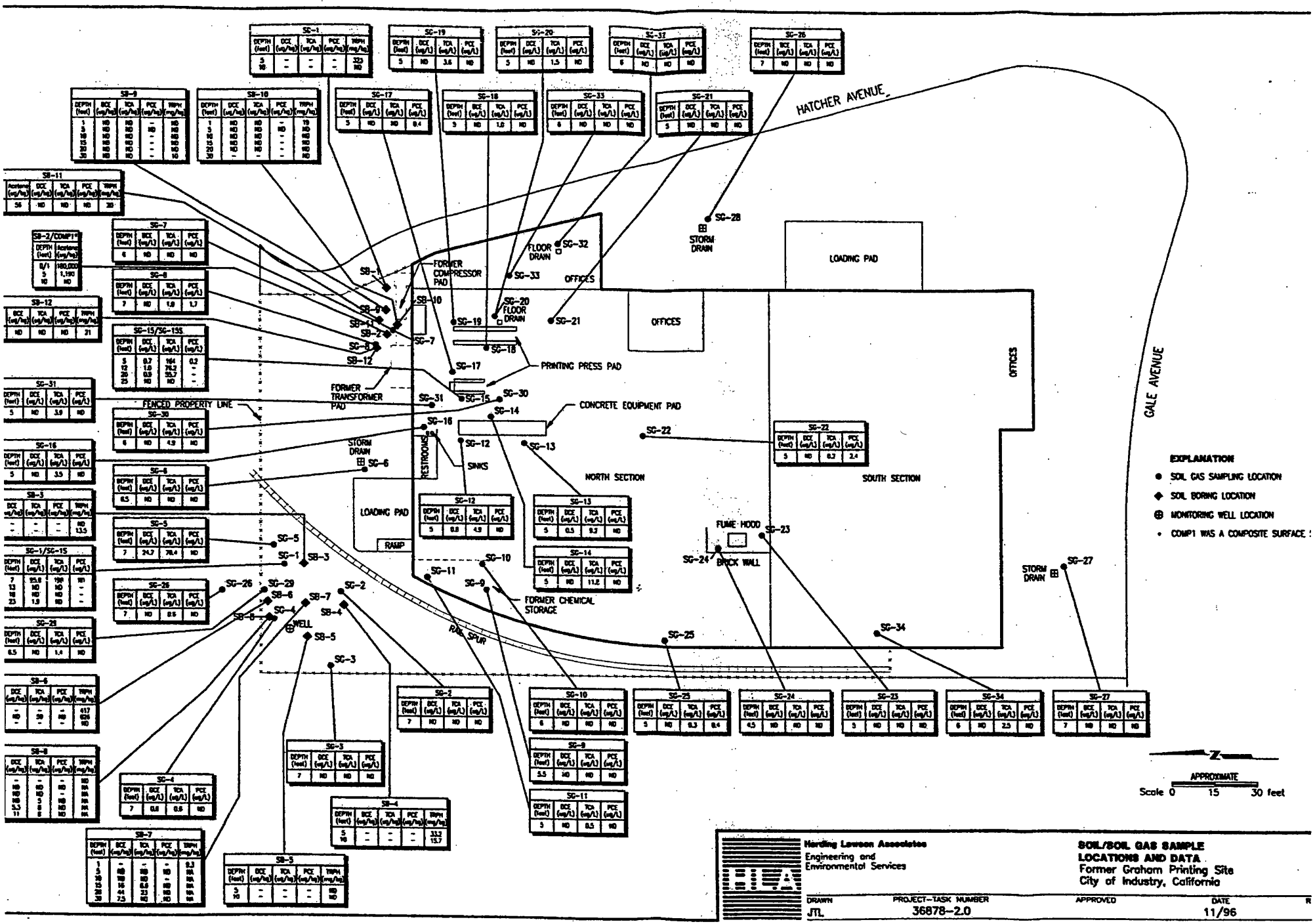
Attachments: A - Site Map
B - Bibliography

ATTACHMENT A

SITE MAP



Harding Lawson Associates
Engineering and Environmental Services

SOIL/SOIL GAS SAMPLE LOCATIONS AND DATA
Former Graham Printing Site
City of Industry, California

DRAWN	PROJECT--TASK NUMBER	APPROVED	DATE	R
JTL	36878-2.0		11/96	

ATTACHMENT B

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