

**SITE CLEANUP PROGRAM FILE REVIEW FORM**  
PLEASE READ BEFORE REVIEWING FILES

1. TO BE FILLED OUT COMPLETELY BY PERSON RECEIVING THE REQUEST

Request Received by: Jan Fulmer Date: 4-2-09

Person (s) who wish To review files.	Phone Number:	Representing:
<u>Wesley</u>	<u>(801) 771-2800</u>	<u>earth touch</u>
<u>Dewsnup</u>	<u>x110</u>	

Files to be reviewed:

SCP# \_\_\_\_\_ WIP# 10210055  
Site Name: Calmar Inc.  
Volume: 3 boxes (2209, 2211, 2213)  
File Location Don's Desk

2. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT

Appointment Date: 4-10-09 Time (s) 9:00AM  
Staff Contact: CAO Phone: (213) 576-6758

INITIAL HERE IF USING A COPY SERVICE \_\_\_\_\_ DATE OF SERVICE \_\_\_\_\_

**\*NOTE TO FILE REVIEWER AND/OR COPY SERVICE\***

*Due to the amount of damaged files returned after previous files reviews, it is hereby requested that all files reviewed be treated in the following manner. This includes but not limited to: keeping chronological order, binding separated reports after copies have been made, theft of documents, damaging documents, removal of personal notes and tabs indicating what pages should be copied and not mixing case files with other files being reviewed. These are public documents and may NOT be removed from the premises. Failure to adhere to the above will result in the Reviewer and Copy Service being banned from copying further documents.*

I CERTIFY THAT I HAVE READ THE ABOVE STATEMENT AND WILL NOT REMOVE ANY FILES FROM THE PREMISES, ABUSE OR DAMAGE FILES AND HAVE REPLACED ALL FILES REVIEWED IN THE ORDER IN WHICH THEY WERE PROVIDED TO ME.

SIGNATURE OF REVIEWER \_\_\_\_\_

COPY SERVICE SIGNATURE \_\_\_\_\_

COMMENTS \_\_\_\_\_

Project name: CALMAR

SLIC No. 102.0055

State of California  
Environmental Protection Agency

## REMEDIATION SECTION CASE REVIEW FORM

Los Angeles Regional  
Water Quality Control Board

Case Reviewer: Donald Indermill Date: 7/16/2007	Unit Chief: Dixon Ariola Date:	Section Chief: Arthur G. Heath Date:	AEO: David Bacharowski Date:	EO: Jonathan Bishop Date:
SLIC file no.: 102.0055		Site ID:	Account Status: Paid <input type="checkbox"/> Yes <input type="checkbox"/> No	
Site Name/Address: <b>CALMAR</b> 333 Turnbull Canyon Road City of Industry 91745	Responsible parties: First Industrial Realty Trust., Incorporated		Address: 311 South Wacker Drive Suite 4000 Chicago, Illinois 60606 Attn: Ben Olszewski	Phone no.:  312-344-4494

**I. CASE INFORMATION**

Area of Concern	Contaminant Source	Chemicals of Concern	Source Status	Date of Action
Clarifier (Interior)	wastewater	Aromatic Volatile Organics, Halogenated Volatile Organics	Source removed 2005; Assessment completed soil borings and soil vapor samples; data summary Table 1 & 2; Figures 3 & 4 BB&J letter 2/3/2005	1998 & 2000
Injection Mold Repair Area (Interior)	Chemical use	Aromatic Volatile Organics; Halogenated Volatile Organics	Source removed 2005; Assessment completed soil borings and soil vapor samples; data summary Table 3 & 4; Figures 1 & 3 BB&J letter 2/3/2005	1997
Waste Storage Area (Exterior)	Waste Storage	Aromatic Volatile Organics, Halogenated Volatile Organics	Source removed 2005; Assessment completed soil borings and soil vapor samples; data summary Table 9 & 10; Figures 1, 2 & 3 BB&J letter 2/3/2005; BB&J Vapor Study Report 2005	1988, 1991, 1992, 1993, 1997, 2005
Wastewater Collection Area	wastewater	Aromatic Volatile Organics; Halogenated Volatile Organics	Source removed 2005; Assessment completed soil borings and soil vapor samples; data summary Table 5, 6, 7 & 8; Figures 1 & 2 BB&J letter 2/3/2005	1988, 1991, 1992, 1993, 1997

**II. SITE CHARACTERIZATION INFORMATION**

GW Basin: Puente Valley	Designated beneficial uses: MUN, IND, AGR, and PROC	Depth to groundwater : Shallow Zone: 35 feet bgs Intermediate zone: 125 feet bgs Water Production Zone: 345 feet bgs	
Distance to nearest municipal supply well: 0.5 mile NE		Distance between known shallow GW contamination and current drinking water aquifer: approximately 270 feet	
GW highest depth: 25 feet bgs	GW lowest depth: 41 feet bgs	Monitoring well screen interval: N/A – wells abandoned 2005	Flow direction: Northwest
Soil types: ML/CL	Max soil depth sampled: 55 feet bgs	AB681 Notification: <input type="checkbox"/> yes <input type="checkbox"/> no AB2436 Deed Restriction: <input type="checkbox"/> yes <input type="checkbox"/> no	Adjacent to school: <input type="checkbox"/> yes <input checked="" type="checkbox"/> no

III. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS IN SOIL VAPOR

Contaminant	Soil vapor (µg/L) Waste Storage Area		CHHSLs -with engineered fill (01/05)		CHHSLs - without engineered fill (01/05)		Soil Vapor Screening Level* (µg/L)
	Earliest (10/14/1999)	Latest (April 8, 2005)	Res (µg/L)	Com/Ind (µg/L)	Res (µg/L)	Com/Ind (µg/L)	
Benzene	Not detected	Not detected	0.085	0.28	0.036	0.12	
Toluene	Not detected	Not detected	320	890	140	380	
Ethylbenzene	Not detected	Not detected	postponed	postponed	postponed	postponed	
Xylenes	Not detected	Not detected	740	2,100	320	880	
MTBE	Not detected	Not detected	8.6	29	4.0	13	
Carbon Tetrachloride	Not detected	Not detected	0.063	0.21	0.025	0.085	
1,2-Dichloroethane	Not detected	Not detected	0.11	0.36	0.05	0.17	
cis-1,2-Dichloroethylene	1.0	Not detected	41	120	16	44	
Trans-1,2-Dichloroethylene	Not detected	Not detected	84	240	32	89	
Tetrachloroethylene	230	28	0.47	1.6	0.18	0.6	
Trichloroethylene	8.2	0.51	1.3	4.4	0.53	1.8	
1,1,1-Trichloroethane	Not detected	Not detected	2,500	7,000	990	2,800	
Vinyl Chloride	Not detected	Not detected	0.028	0.095	0.013	0.045	
Naphthalene	Not detected	Not detected	0.093	0.31	0.032	0.11	
Mercury (elemental)	Not detected	Not detected	0.21	0.56	0.045	0.13	
Tetraethyl Lead	Not detected	Not detected	0.0016	0.0045	0.00021	0.00058	

\*derived based on Regional Board Interim Site Assessment and Cleanup Guidebook 1996 for groundwater resource protection

**IV. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS IN UNSATURATED SOIL**

Contaminant	Soil (mg/kg)		PRGs (10/04)		CHHSLs (non-volatile) (01/05)		RB2-ESLs (02/05) (Table A or C)		Soil Screening Level* (mg/kg)
	Earliest (10/14/1988)	Latest (4/8/2005)	Res (mg/kg)	Ind (mg/kg)	Res (mg/kg)	Com/Ind (mg/kg)	Res (mg/kg)	Com/Ind (mg/kg)	
Tetrachloroethylene	0.380	0.194							
Trichloroethylene	0.076	nd							
Benzene	<0.050	0.002							0.165
Toluene	<0.050	0.003							9.0

\*derived based on Regional Board Interim Site Assessment and Cleanup Guidebook 1996 for groundwater resource protection

**V. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS IN GROUNDWATER**

Contaminant	Groundwater (µg/L)		Maximum Contaminant Level (µg/L)	Contaminant	Groundwater (µg/L)		Maximum Contaminant Level (µg/L)
	Earliest (1988)	Latest (2000)			Earliest (1988)	Latest (2000)	
Tetrachloroethylene	47	28	360	cis-1,2-Dichloroethylene	<1.0	9.9	9.9
Trichloroethylene	110	500	580	1,1,1-Trichloroethane	<1.0	<5.0	98
1,2-Dichloroethane	12	<5.0	320				

**VI. SOIL REMEDIATION**

Method: Soil Vapor Extraction Pilot Test	Duration of remediation: Pilot Test Demonstrated that soil Vapor extraction would not be effective remediation technology
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**VII. GROUNDWATER REMEDIATION**

Method: Not applicable – Site is a PRP in Puente Valley Operable Unit	Duration of remediation:
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**VIII. FREE PRODUCT:**

Was free product encountered? Not Applicable	Has free product been totally recovered? Not Applicable
When was free product recovery project completed? Not Applicable	

**IX. RECOMMENDED ACTION:**

Soil Closure only: Recommended	Case Closure: Recommended	Solvent Case? Yes
Additional Action Required (i.e.: additional site assessment, remediation, monitoring): Deed Restriction		

**X. CASE SUMMARY AND JUSTIFICATION FOR RECOMMENDED ACTION:**

Site history See attached BB&J reports
Site assessment; See attached BB&J Reports
Remediation; SVE Pilot test · Pilot Test Demonstrated that soil Vapor extraction would not be effective remediation technology

Justification for NFA The responsible party has performed a soil vapor and soil matrix testing in last area of concern. Previous consultants demonstrated that soil vapor extraction operations at the subject site would not meet performance criteria. The RP has demonstrated the soil vapor and soil matrix concentrations are above the CHHSLs; however the concentrations of PCE in the soil matrix and vapor phase has been limited to the shallow subsurface at the site and the RP is prepared to place a deed restriction on the property.



# California Regional Water Quality Control Board Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams  
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

October 29, 2007

Ms. Valerie Baxa  
First Industrial Realty Trust  
311 S. Wacker Dr., Suite 4000  
Chicago, IL 60606

## 2007 – 2008 ANNUAL ESTIMATION LETTER FOR THE SITE CLEANUP COST RECOVERY PROGRAM – CALMAR, INC. AT 333 TURNBULL CANYON, INDUSTRY, CALIFORNIA 91745 (WIP NO. 102.0055; SITE ID NO. 2040156)

Dear Ms. Baxa:

Section 13304 of the California Water Code (Porter Cologne Act) allows the Regional Water Quality Control Boards (Regional Boards) to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at the subject site (Site) in accordance with our original cost recover letter. In compliance with Section 13365 of the California Water Code, this letter is being sent to provide you the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be preformed or services to be provided;
2. A statement of the expected outcome of that work;
3. The billing rates for all individuals and classes of employees expected to engage in the work; and
4. An estimate of all expected charges to be billed to you by this agency.

### Estimate of Work to be Performed

The Regional Board staff estimate that during the Regional Board's 2007/2008 fiscal year (July 1, 2007 to June 30, 2008) regulatory oversight work that may include, but not limited to, the following tasks to be performed at your Site:

1. Review environmental reports;
2. Request and review of additional assessment work plans, corrective action plans and other technical reports as necessary;
3. Preparation of comment letters on various reports and communicate findings to responsible parties;
4. Conduct site inspections, collect soil and/or groundwater samples, and meet with environmental consultants and responsible parties; and
5. Conduct internal and external communications (i.e. meetings, memos) about the Site.

### Statement of Expected Outcome

**California Environmental Protection Agency**



*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

Ms. Valerie Baxa  
First Industrial Realty Trust

- 2 -

October 29, 2007

The expected outcome of work that will be performed during fiscal year 2007/2008 includes:

- Provide written comments on technical reports to be submitted as appropriate;
- Verify the adequacy of technical reports; and
- Prepare and issue directive orders to the Site, as determined to be necessary by this Regional Board.

### **Billing Rates**

Attached are the Site Cleanup Program, Monthly Salary Scales by Job Classification (Attachment 1) for employees expected to perform the work and the Reimbursement Process for Regulatory Oversight (Attachment 2). The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is about \$125.00 per hour. Recent salary adjustments will affect the current billing rates for many of our staff.

### **Estimation of Expected Charges**

Regional Board staff expects to charge about 40 hours for work related to this Site during fiscal year 2007/2008. Based on the average billing rate of \$125 per hour, the estimated billing charge for this site during this fiscal year is about \$5,000.00 . **Please note that this is neither a commitment nor a contract for regulatory oversight. It is only an estimate of the work, which may be performed. Furthermore, we anticipate that there may be possible delays in Regional Board staff's review of reports submitted.**

### **Landowner Notification and Participation Requirements**

Pursuant to Division 7 of the Porter Cologne Water Quality Control Act under section 13307.1, the Regional Board is required to notify all current fee title holders for the subject site prior to considering corrective action or granting case closure. Therefore, you are required to provide the name, mailing address and telephone number for all record fee title holders for the site together with a copy of county record of current ownership, available from the County Recorder's Office, or complete the attached Certification Declaration Form (Attachment 3) and submit it to our office.

If you have not submitted, or updated the enclosed landowner's information (Attachment 3) and "Acknowledgment of Receipt of Cost Reimbursement Account Letter" (Attachment 4), please sign and return these enclosed forms to the Regional Board by **November 30, 2007**.

***California Environmental Protection Agency***



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Ms. Valerie Baxa  
First Industrial Realty Trust

- 3 -

October 29, 2007

## **Other Requirements**

### **I. Change of Ownership**

You must notify the Executive Officer, in writing at least 30 days in advance of any proposed transfer of this cost reimbursement account's responsibility to a new owner containing a specific date for the transfer. In addition, you shall notify the succeeding owner of the existence of this cost reimbursement account by letter, copy of which shall be forwarded to the Regional Board.

### **II. Public Participation**

With increased public interest in our programs and the public knowledge of threat to human health and the environment, the Regional Boards are increasing our effort in getting the public more involved in our decision making process. The Regional Boards are also required to involve the public in site cleanup decisions under State law (including Health & Safety Code section 25356.1). You may be required to prepare and implement a public participation plan. Regional Board staff will provide you with additional guidance as appropriate.

### **III. Electronic Submittals**

On April 27, 2005, the State Water Resources Control Board informed each responsible party of new regulations requiring the electronic submittal of information (ESI), which went into effect on January 1, 2005. These regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, CCR) require you to submit compliance reports, including site maps, data showing the locations (latitude and longitude) and elevations of boring logs, well screen intervals, depths to water, and data with laboratory analyses over the Internet to Geotracker (the State Water Board's Internet-accessible database system). Data showing locations (latitude and longitude) and elevation and depth data must be submitted in accordance with the Geotracker XYZ survey Guidelines and Restrictions (website: [www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting/docs/GeoTrackerSurvey\\_XYZ\\_4\\_14\\_05.pdf](http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting/docs/GeoTrackerSurvey_XYZ_4_14_05.pdf).)

Furthermore, you are responsible for the authenticity, accuracy, and precision of electronic data submitted by individuals whom you have authorized to the Geotracker system. For the Geotracker XYZ survey, data indicating accurate and precise locations and elevations of boring and monitoring wells must be measured, referenced to NAD83 and NAVD88, and documented by professionals who are licensed to practice land surveying in California. And you or your agent must confirm the accuracy of the survey data after upload into to Geotracker's electronic database.

***California Environmental Protection Agency***

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Ms. Valerie Baxa  
First Industrial Realty Trust

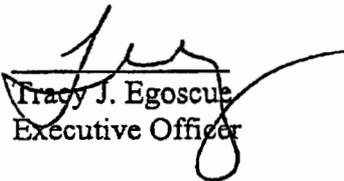
- 4 -

October 29, 2007

The April 27, 2005, letter also stated that beginning on July 1, 2005, a paper copy of reports will no longer be required upon submittal of the electronic copy unless the Regional Board specifically requires the paper copy to be submitted. However, the Site Cleanup Program at the Los Angeles Regional Board does not have the resources to acquire hardware to allow caseworkers to appropriately review documents in electronic form. Therefore, for the foreseeable future, we request that you continue to submit hard copies of all documents and data submittals.

If you have any questions, please contact the Site Cleanup Program Manager, Ms. Su Han at (213) 576-6735.

Sincerely,

  
Tracy J. Egoscue  
Executive Officer

Attachments:

1. Monthly Salary Scales by Job Classification
2. Reimbursement Process for Regulatory Oversight
3. Certification Declaration Form
4. Acknowledgment of Receipt of Cost Reimbursement Account Letter
5. New Regulations – Electronic Submittal of Information

**California Environmental Protection Agency**



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**SITE CLEANUP I UNIT**  
**MAIL CHECKLIST-KEEP ON TOP**

EXECUTIVE OFFICER to sign \_\_\_\_\_ SITE ID# 2040156  
 File \_\_\_\_\_ P C A# 18041  
 Return File to ORIGINATOR \_\_\_\_\_ Originator LL  
 Mail out by \_\_\_\_\_ Spellcheck by ORIGINATOR \_\_\_\_\_

ADDRESSEE: Valerie Baxa

FILE# 102.0055

ENCLOSURES: 2007 - 2008 ANNUAL ESTIMATION LETTER  
ATTACHMENTS 1 - 5

COPIES TO:	HOW MANY?
STAFF <u>DI</u>	<u>1</u>
FILE _____	<u>2</u>
RF _____	_____
MAILING LIST _____	_____
SUPERVISOR _____	_____
OTHER <u>LL</u>	<u>1</u>

MAIL CONTROL LOG # \_\_\_\_\_

REPORT REQUIREMENTS:

_____ INSPECTION REPORT	YES _____	NO _____
_____ BACKGROUND MEMO	YES _____	NO _____
_____ TRACING SHEET	YES _____	NO _____
_____ NAME CHANGE		

**APPROVED FOR MAIL OUT**

		PE			AEO		DISK
LL		/		DATE	DAB	/	TIT
ORIGINATOR	SENIOR	RG	SUPERVISOR	OCC	TE	EO	MAIL OUT DATE



# California Regional Water Quality Control Board Los Angeles Region



Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

Inda S. Adams  
Agency Secretary

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Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

August 31, 2006

Ms. Valerie Baxa  
First Industrial Realty Trust  
311 S. Wacker Dr., Suite 4000  
Chicago, IL 60606

## 2006-2007 ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND CLEANUPS (SLIC) COST RECOVERY PROGRAM – CALMAR, INC. - 333 TURNBULL CANYON ROAD, INDUSTRY (WIP NO. 102.0055, SITE ID NO. 2040156)

Dear Ms. Baxa:

Section 13304 of the California Water Code (Porter Cologne) allows the Regional Water Quality Control Board (Regional Board) to recover reasonable expenses from a responsible party for overseeing the investigation and cleanup of unregulated discharges adversely affecting the State's waters. It is our intent to continue to recover costs for regulatory oversight work conducted at this site in accordance with our original cost recovery letter. In compliance with Section 13365 of the California Water Code, this letter is being sent to provide you with the following information regarding costs for regulatory oversight work:

1. A detailed estimate of the work to be performed or services to be provided;
2. A statement of the expected outcome of that work;
3. The billing rates for all individuals and classes of employees expected to engage in the work; and
4. An estimate of all expected charges to be billed to you by this agency.

### Estimate of Work to be Performed

Regional Board staff estimate that the following work may be performed during fiscal year 2006/2007 (July 1, 2006 to June 30, 2007):

- Review project technical reports (such as workplan, investigation report, remedial action plan, monitoring report, and closure report..., etc.) that may be necessary;
- Provide written correspondences and telephone communications with the responsible party, its representatives and interested third parties;
- Conduct internal communications (i.e., meeting, memos, etc.) regarding the project;
- Meet with the responsible party, its representatives, consultants, and interested parties; and
- Conduct site inspection and/or collect split samples as appropriate.

**California Environmental Protection Agency**



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Ms. Valerie Baxa  
First Industrial Realty Trust  
Site ID No. 2040156

- 2 -

August 31, 2006

### **Statement of Expected Outcome**

The following is the expected outcome of work that may be performed during fiscal year 2006/2007:

- Provide written comments on technical reports to be submitted as appropriate;
- Verify adequacy of technical reports; and
- Prepare and issue directive orders to the site, as determined to be necessary by the Regional Board.

### **Billing Rates**

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is approximately \$110.00 per hour as shown in Attachment 1. Recent salary adjustments will affect the current billing rates for many of our staff. An update billing rate will be included in the first quarter invoice for fiscal year 2006/2007.

### **Estimation of Expected Charges**

Regional Board staff expects to charge about 40 hours of work related to this site during fiscal year 2006/2007. Based on the average billing rate of \$110 per hour, the estimated billing charge for this site during fiscal year 2006/2007 is \$4,400. **Please note that this is neither a commitment nor a contract for regulatory oversight. It is only an estimate of the work, which may be performed. Furthermore, we anticipate that there may be possible delays in Regional Board staff's review of reports submitted.**

### **Other Requirements**

#### **I. Public Participation**

With increased public interest in our site cleanup programs and the public knowledge of threat to human health and the environment, the Regional Board is increasing our effort in getting the public more involved in our decision making process. The Regional Boards are also required to involve the public in site cleanup decisions under State law (including Health & Safety Code section 25356.1). You may be required to prepare and implement a public participation plan. Regional Board staff will provide you with additional guidance as appropriate.

#### **II. Electronic Submittals**

On April 27, 2005, the State Water Resources Control Board informed each responsible party of new regulations requiring the electronic submittal of information (ESI), which went into effect on January 1, 2005. The letter also stated that beginning on July 1, 2005, a paper copy of reports will no longer be required upon submittal of the electronic copy unless the Regional Board specifically requires the paper copy to be submitted.

***California Environmental Protection Agency***



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Ms. Valerie Baxa  
First Industrial Realty Trust  
Site ID No. 2040156

- 3 -

August 31, 2006

### III. Change of Ownership

You must notify the Executive Officer, in writing at least 30 days in advance of any proposed transfer of this cost reimbursement account's responsibility to a new owner containing a specific date for the transfer. In addition, you shall notify the succeeding owner of the existence of this cost reimbursement account by letter, copy of which shall be forwarded to the Board.

**If you have any questions, please contact the project manager, Don Indermill at (213) 576-6813 or the SLIC Program Manager, Arthur Heath at (213) 576-6725.**

Sincerely,



Jonathan S. Bishop  
Executive Officer

Attachments: 1. Spills, Leaks, Investigations, and Cleanups (SLIC) Program - Billing Cost Explanation  
2. New Regulation - Electronic Submittal of Information

***California Environmental Protection Agency***

 Recycled Paper

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**BRADBURNE  
BRILLER &  
JOHNSON, LLC**

April 6, 2006

Mr. Dixon Oriola  
California Regional Water Quality Control Board  
Los Angeles Region  
320 W 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Re: **Confirmation Letter**  
**Abandonment of Ground-Water Monitoring Wells**  
**Former CALMAR Facility**  
**333 Turnbull Canyon Road**  
**City of Industry, CA**  
**BB&J Project No. 0098704**

Dear Mr. Oriola:

Bradburne, Briller & Johnson, LLC (BB&J) will proceed with the abandonment of the ground-water monitoring wells for the Former CALMAR Facility located at 333 Turnbull Canyon Road in City of Industry, California (Subject Property) upon obtaining the well abandonment permit from the Los Angeles County, Department of Health Services. Our request for abandonment was verbally approved by you during the March 30, 2006 meeting with Mr. Daniel T. Elliott of BB&J and confirmed via electronic mail later that same day.

We appreciate your time and consideration regarding this matter. Please call Mr. Elliott at (818) 884-2978 if you have any further questions.

Sincerely,

**Bradburne, Briller & Johnson, LLC**

Daniel T. Elliott, R.G.  
Principal

Paul C. Owens, P.G.  
Project Manager/Principal

cc: *Ms. Valerie Baxa, First Industrial*  
*Mr. Benjamin Olszewski, First Industrial*

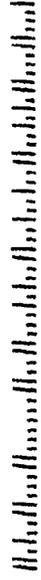
Bradburne, Briller & Johnson, LLC  
8418 Pinelake Drive, Suite G  
West Hills, CA 91304



SANTA CLARITA  
CA 91331  
11 APR 2015 PM

Mr. Dixon Oriola  
California Regional Water Quality Control  
Board  
Los Angeles Region  
320 W 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

90013+2343





# California Regional Water Quality Control Board

## Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Alan C. Lloyd, Ph.D.  
Agency Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

August 19, 2005

Ms. Valerie Baxa  
First Industrial Realty Trust  
311 S. Wacker Dr., Suite 4000  
Chicago, IL 60606

### **ANNUAL ESTIMATION LETTER FOR SPILLS, LEAKS, INVESTIGATIONS, AND CLEANUPS (SLIC) COST RECOVERY PROGRAM — CALMAR, INC. - 333 TURNBULL CANYON ROAD, INDUSTRY (SITE ID NO. 2040156)**

Dear Ms. Baxa:

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1. A detailed estimate of the work to be performed or services to be provided;
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3. The billing rates for all individuals and classes of employees expected to engage in the work; and
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- Review project technical reports (such as workplan, investigation report, remedial action plan, monitoring report, and closure report...etc.) that may be necessary;
- Provide written correspondences and telephone communications with the responsible party, its representatives and interested third parties;
- Conduct internal communications (i.e. meeting, memos, etc.) regarding the project;
- Meet with the responsible party, its representatives, consultants, and interested parties; and
- Conduct site inspection and/or collect split samples as appropriate.

**California Environmental Protection Agency**



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### Statement of Expected Outcome

The following is the expected outcome of work that may be performed during fiscal year 2005/2006:

- Provide written comments on technical reports to be submitted as appropriate;
- Verify adequacy of technical reports; and
- Prepare and issue directive orders to the site, as determined to be necessary by the Regional Board.

### Billing Rates

Enclosed is the billing rate for employees expected to perform the work. The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is approximately \$90.00 per hour as shown in Attachment 1.

### Estimation of Expected Charges

Regional Board staff expects to charge about 60 hours of work related to this site during fiscal year 2005/2006. Based on the average billing rate of \$90 per hour, the estimated billing charge for this site during fiscal year 2005/2006 is \$5,400. **Please note that this is neither a commitment nor a contract for regulatory oversight. It is only an estimate of the work, which may be performed. Furthermore, we anticipate that there may be possible delays in Regional Board staff's review of reports submitted.**

### New Requirements

#### I. Public Participation

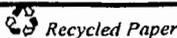
With increased public interest in our site cleanup programs and the public knowledge of threat to human health and the environment, the Regional Board is increasing our effort in getting the public more involved in our decision making process. The Regional Boards are also required to involve the public in site cleanup decisions under State law (including Health & Safety Code section 25356.1). You may be required to prepare and implement a public participation plan. Regional Board staff will provide you with additional guidance as appropriate.

#### II. Electronic Submittals

On April 27, 2005, the State Water Resources Control Board informed each responsible party of new regulations requiring the electronic submittal of information (ESI), which went into effect on January 1, 2005. The letter also stated that beginning on July 1, 2005, a paper copy of reports will no longer be required upon submittal of the electronic copy unless the Regional Board specifically requires the paper copy to be submitted.

**The Los Angeles Regional Board does not have the resources to acquire hardware to allow caseworkers to appropriately review documents in electronic form. Therefore, for the foreseeable future, we require that you continue to submit hard copies of all documents and data submittals.**

*California Environmental Protection Agency*



Ms. Valerie Baxa  
2005-2006 Annual Estimation Letter

- 3 -

August 19, 2005

### III. Change of Ownership

You must notify the Executive Officer, in writing at least 30 days in advance of any proposed transfer of this cost reimbursement account's responsibility to a new owner containing a specific date for the transfer. In addition, you shall notify the succeeding owner of the existence of this cost reimbursement account by letter, copy of which shall be forwarded to the Board.

If you have any questions, please contact the project manager, Alan Hsu at (213) 576-6731 or the SLIC Program Manager, Dr. Rebecca Chou at (213) 576-6733.

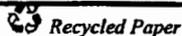
Sincerely,



Jonathan S. Bishop  
Executive Officer

Attachments: 1. Spills, Leaks, Investigations, and Cleanups (SLIC) Program - Billing Cost Explanation  
2. New Regulation - Electronic Submittal of Information

**California Environmental Protection Agency**



*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

**SITE CLEANUP I UNIT**

**MAIL CHECKLIST-KEEP ON TOP**

EXECUTIVE OFFICER to sign \_\_\_\_\_ SITE ID# 2040156  
 \_\_\_\_\_ File \_\_\_\_\_ P C A# 18041  
 \_\_\_\_\_ Return File to ORIGINATOR \_\_\_\_\_ Originator JA  
 \_\_\_\_\_ Mail out by \_\_\_\_\_ Spellcheck by ORIGINATOR

ADDRESSEE: Valerie Baxa

FILE# SITE ID NO. 2040156

ENCLOSURES: 1. SLIC Billing Cost

2. New Regulations - ESI

COPIES TO:	HOW MANY?
STAFF <u>Alan Hsu</u>	<u>1</u>
FILE _____	_____
RF _____	_____
MAILING LIST _____	_____
SUPERVISOR _____	_____
OTHER <u>JA</u>	<u>1</u>

MAIL CONTROL LOG # \_\_\_\_\_

REPORT REQUIREMENTS:

_____ INSPECTION REPORT	YES _____	NO _____
_____ BACKGROUND MEMO	YES _____	NO _____
_____ TRACING SHEET	YES _____	NO _____
_____ NAME CHANGE		

**APPROVED FOR MAIL OUT**

JA 8/23/05 ORIGINATOR	RC 8/23/05 SENIOR	PE RC RG	SUPERVISOR	DATE OCC	AEO DAB JB EO	AUG 23 2005 MAILOUT DATE	DISK:
							TITLE:



**BRADBURNE  
BRILLER &  
JOHNSON, LLC**

July 28, 2005

Mr. Alan Hsu  
Engineer  
California Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street  
Suite 200  
Los Angeles, CA 90013

**Re: Waste Storage Area Soil/Vapor Study Data Report  
Calmar  
333 Turnbull Canyon Road  
City of Industry, CA  
BB&J Project No. 0098704**

Dear Mr. Hsu:

On behalf of First Industrial Realty Trust, Inc. (First Industrial), Bradburne, Briller & Johnson, LLC (BB&J) is pleased to provide the California Regional Water Quality Control Board (CRWQCB) with this *Waste Storage Area Soil/Vapor Study Data Report* (Report) for the Calmar property located at 333 Turnbull Canyon Road in City of Industry, California (Subject Property). This Report is being submitted to provide the results for activities conducted in accordance with the *Site Investigation Work Plan* prepared by BB&J (dated March 19, 2005) and verbally approved by the CRWQCB on April 1, 2005 during a phone conversation between Ms. Valerie Baxa of First Industrial and Mr. Alan Hsu of the RWQCB.

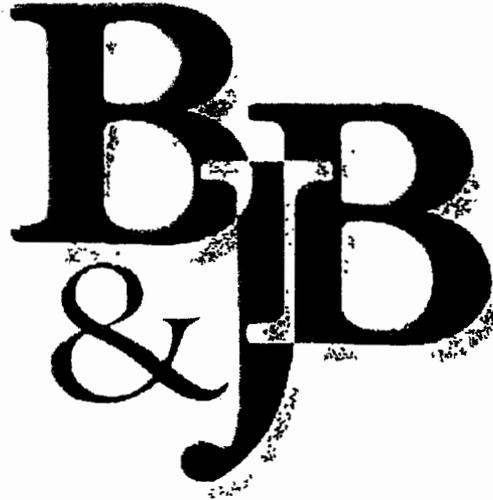
Should you have any questions or require additional information, please call Mr. Daniel T. Elliott at (818) 673-1672 or Mr. Paul Owens of BB&J at (978) 834-0798.

Sincerely,

**BRADBURNE, BRILLER & JOHNSON, LLC**

Daniel T. Elliott, R.G. 4129, R.E.A.  
Registered Geologist

Paul C. Owens, P.G.  
Project Manager / Principal



**WASTE STORAGE AREA SOIL/VAPOR STUDY DATA REPORT**

**CALMAR FACILITY  
333 Turnbull Canyon Road  
City of Industry, CA**

Submitted to:

**First Industrial Realty Trust  
Chicago, Illinois**

and

**Los Angeles Regional Water Quality Control Board  
Los Angeles, California**

Prepared by:

**BRADBURNE, BRILLER & JOHNSON, LLC  
Amesbury, Massachusetts**

July 28, 2005

**WASTE STORAGE AREA SOIL/VAPOR STUDY DATA REPORT**

**CALMAR FACILITY  
333 Turnbull Canyon Road  
City of Industry, CA**

Submitted to:

**First Industrial Realty Trust**  
Chicago, Illinois

and

**Los Angeles Regional Water Quality Control Board**  
Los Angeles, California

Prepared by:

**BRADBURNE, BRILLER & JOHNSON, LLC**  
Amesbury, Massachusetts

July 28, 2005

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Figure 2	Site Plan Showing Soil Vapor Sampling Locations and Results
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## APPENDIX

Appendix A	Copy of Laboratory Analytical Reports
Appendix B	Copy of Soil-Vapor and Soil-Matrix Laboratory Analytical Results

## 1.0 INTRODUCTION

This *Waste Storage Area Soil/Vapor Study Data Report* (Report) summarizes the results from the site investigation activities conducted by Bradburne, Briller & Johnson, LLC (BB&J) in accordance with the Site Investigation Work Plan prepared by BB&J (dated March 19, 2005) and authorized by First Industrial Realty Trust (First Industrial) for the Calmar site located at 333 Turnbull Canyon Road in City of Industry, California (Figure 1 – Subject Property). The site investigation at the Subject Property was conducted following consultation and approval of the Work Plan by the Los Angeles Regional Water Quality Control Board (RWQCB).

## 2.0 OBJECTIVES

This Report includes our proposed scope of work, following the RWQCB Interim Guidance for Active Soil Investigation, dated February 25, 1997, and DTSC and RWQCB Advisory – Active Soil Investigations, dated January 28, 2003 (i.e., Interim Guidance Document – refer to Appendix A). The purpose of this site investigation was to: (1) acquire soil gas and soil matrix data to update existing laboratory analytical data; (2) to further delineate the nature and extent of known constituents of concern (COCs); and, (3) to address emergent chemicals. The most recent soil-gas data that was available to BB&J, First Industrial and the RWQCB prior to the April 2005 site investigation was collected in September 2000. Based on conversations with First Industrial and the RWQCB, BB&J collected more data for use in developing a Remedial Action Plan (RAP), if necessary, that would address the RWQCB's concerns regarding chlorinated compounds detected in soils at the Subject Property.

## 3.0 SITE DESCRIPTION

The Calmar Facility, located at 333 Turnbull Canyon Road in City of Industry, California, has been in operation as a plastics injection-mold production plant since 1963, when the facility was constructed. The 6.6-acre property contains one, single-story, slab-on-grade building, which is approximately 112,000-square feet. Activities at the Subject Property include manufacturing, storage and distribution. The southwestern portion of the site has been used as a hazardous waste storage area.

## 4.0 SITE INVESTIGATION

The purpose of the April 2005 site investigation was to conduct a shallow soil gas and subsurface investigation across the southwestern portion of the Subject Property (i.e., Waste Storage Area) to acquire updated soil gas and soil matrix data, further delineate the nature and extent of known COCs, and measure for the presence of emergent chemicals. BB&J personnel marked the proposed soil gas/soil matrix locations and notified Underground Services Alert 48 hours prior to drilling. The utility markings indicated that several fire suppression water pipes were located in the drilling area; therefore, a detailed geophysical survey of the drilling locations was conducted on April 7, 2005, prior to drilling. The soil gas/soil matrix probe locations are shown on Figure 2.

#### 4.1 Soil Sample and Soil Gas Survey Fieldwork

Seven soil gas probe locations (i.e., SV-1 through SV-7) were advanced to a total depth of 20 feet below ground surface (bgs) using direct-push technology (i.e., a truck-mounted Geoprobe® unit). The original seven soil gas locations were drilled on April 7 and 8, 2005, and are shown on Figure 2. At each soil probe location, one soil gas sample was collected for laboratory analyses at the 5-foot, 10-foot and 20-foot interval to evaluate the concentrations of volatile organics in the shallow soils. Based on the initial soil gas results and from the results of previous work completed by others, two soil probe locations, SV-2 and SV-6, were selected for the collection of soil matrix samples.

##### 4.1.1 Soil Gas Samples

Seven soil gas probe locations were advanced to 20 feet bgs using a Geoprobe® unit. The "nested" soil gas probes were constructed at the 5, 10, and 20-foot intervals using the methodology described in Section 2.2, Soil Gas Sampling Probe Installation in the RWQCB/DTSC Soil Gas Sampling Advisory, dated January 28, 2003.

The soil gas samples were collected at each sampled interval, after 30 minutes of equilibration, from a section of 1/4-inch, virgin polyethylene tube installed at the correct depth interval. To ensure collection of a representative sample, discrete volumes of soil gas were purged to eliminate atmospheric air in the tubing and to allow soil gas into the tubing. In order to maintain equilibrium in the soil, the sample vacuum was monitored during purging to avoid high vacuum pressures. Soil gas was withdrawn from the sampling probe after purging using a gas-tight sampling syringe. Soil gas samples were sub-sampled and analyzed within 30 minutes of collection by H&P Mobile Geochemistry (HPL), an onsite state-certified mobile laboratory.

Field personnel and subcontractors under the supervision of a California Registered Geologist (Daniel T. Elliott) delivered the soil gas samples directly to the mobile laboratory. Chain-of-custody documentation accompanied the samples at all times.

During the survey, duplicate soil gas samples were monitored, leak tests were conducted and the daily calibration checks were run as required. No soil cuttings were generated during this site investigation.

HPL analyzed the soil gas samples for volatile organic compounds (VOCs) using United States Environmental Protection Agency (U.S. EPA) method 8260B. A total of 27 soil gas samples were collected during this task.

##### 4.1.2 Soil Matrix Samples

Soil samples from the SV-2 (at 10 and 25 feet bgs) and SV-6 (at 2.5, 5, 10 and 25 feet bgs) soil gas locations were collected on April 8, 2005 after review of the soil gas data collect the previous day. Samples were collected at the selected intervals by driving a sampler ahead of the probe equipment into undisturbed soil. The samples were sub-sampled and preserved in the field using U.S. EPA method 5035. The soils were classified in accordance with the Unified Soil Classification System (USCS) and the remainder of the samples were retained in clean acetate sleeves, capped with Teflon-lined plastic lids, and sealed. The samples were labeled and placed in a chilled ice chest for delivery to a State-certified laboratory (i.e., American Scientific Laboratories, LLC of Los Angeles, California) for chemical testing. Chain-of-custody documentation accompanied the samples at all times.

During soil probe advancement, duplicate soil samples and soil cuttings were monitored for field indications of impacts such as discoloration or the presence of VOCs using a photo-ionization detector (PID) (i.e., OVM Model 580). The PID was calibrated to the manufacturer's specifications using 50 parts per million isobutylene standard on a daily basis. A total of seven soil matrix samples were collected during this task. The soil matrix locations are shown on Figure 2.

#### **4.2 Field Observations**

The soils encountered in the soil probes consisted primarily of clays, silts and sandy silt-sized materials. Some interbedded silts and sandy silts were also observed. Field observation and screening of the samples indicated no soil discoloration, odors or detectable VOCs.

#### **4.3 Soil Gas Data – VOCs**

Trace concentrations or no VOCs were detected in the soil gas probe locations at the 5-, 10- and 20-foot intervals. Concentrations of VOCs (i.e., Freon-113) were detected at the 5-foot interval varying from non-detect to 0.5 micrograms per Liter in air. Concentrations of VOCs (i.e., Freon-113, tetrachloroethene, trichloroethene, 1,1,1-trichloroethane and 1,1-dichloroethene) were detected at the 10-foot interval varying from non-detect to 4.4 micrograms per Liter in air. Concentrations of VOCs (i.e., tetrachloroethene, trichloroethene, 1,1,1-trichloroethane and 1,1-dichloroethene) were detected at the 20-foot interval varying from non-detect to 24.0 micrograms per Liter in air. Refer to Appendix A for a copy of the laboratory analytical reports and Table 1 for the laboratory analytical results.

#### **4.4 Soil Matrix Data – VOCs**

Trace concentrations of tetrachloroethene were detected in the soil matrix probe location SB-2 (i.e., location of SV-2) at the 10- and 25-foot intervals at 26 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ ) and 14  $\mu\text{g}/\text{kg}$ , respectively. Concentrations of tetrachloroethene were detected in the soil matrix probe location SB-6 (i.e., location of SV-6) at the 2.5-, 5- and 10-foot intervals at 194  $\mu\text{g}/\text{kg}$ , 16  $\mu\text{g}/\text{kg}$  and 16  $\mu\text{g}/\text{kg}$ , respectively. Concentrations of benzene and toluene were detected at the 10-foot interval at 2.00  $\mu\text{g}/\text{kg}$  and 3  $\mu\text{g}/\text{kg}$ , respectively. Refer to Appendix A for a copy of the laboratory analytical reports and Table 2 for the laboratory analytical results.

#### **4.5 Soil Matrix Data – Metals**

Varying concentrations of CCR Title 22 metals (i.e., arsenic, barium, cadmium, chromium, cobalt, copper, lead, nickel, silver, vanadium and zinc) were reported in the two soil samples analyzed (i.e., SB-2 @ 10 feet bgs and SB-6 @ 2.5 feet bgs); however, none of the reported concentrations exceeded the Title 22 Total Threshold Limit Concentration (TTL). Additionally, when the metal concentration data is compared to the Preliminary Remediation Goals (PRG) published by the U.S. EPA, all metals are below the residential and industrial PRGs for the respective metals. Furthermore, the resultant concentrations are typical of metal concentrations found as background in native soils in Southern California.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

Based upon the information contained herein, BB&J concludes the following:

- The goals set forth within the RWQCB-approved *Site Investigation Work Plan* (prepared by BB&J and dated March 19, 2004) have meet met;
- The subsurface soils beneath the Waste Storage Area have been fully characterized (i.e., updated data has been collected) as requested by the RWQCB; and,
- The minor (i.e., residual) concentrations of residual VOCs identified to be present beneath the Waste Storage Area, have decreased significantly as compared to historical soil-matrix and soil-vapor results [refer to Appendix B of this document for a copy of Tables 9 and 10 of the *Additional Information Letter* previously submitted to the RWQCB (prepared by BB&J and dated February 3, 2005) showing historical soil-matrix and soil-vapor data, respectively].

Based upon the aforementioned conclusions, BB&J requests that no further action is required to assess soil conditions beneath the Subject Property (i.e., File No. 102.0055).

*First Industrial / City of Industry, CA  
BB&J Project No 0098704*

*Waste Storage Area Soil/Vapor Study Data Letter  
July 28, 2005*

**TABLES**

**Table 1: Soil-Vapor Analytical Data – Waste Storage Area**  
 (Page 1 of 2)

Analytical Parameter (COCs)	Analytical Results (µg/L)														
	SV1-10 PV186cc	SV1-10 "D" PV236cc	SV1-5 PV171cc	SV1-10 1PV 62cc	SV1-10 3PV 186cc	SV1-10 7PV 434cc	SV1-20 216cc	SV1-5* 171cc	SV2-20 216cc	SV2-10 186cc	SV2-10 "D" 236cc	SV2-5 171cc	SV3-20 216cc	SV3-10 186cc	
<b>VOCs</b>															
1,1-Dichloroethene	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	0.4	<1	
1,1,1-Trichloroethane	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	
Freon-113	0.6	0.7	0.5	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	
Tetrachloroethene	4.2	4.4	7.2	<1	<1	<1	0.6	2.4	<1	<1	<1	0.4	18	<1	
Trichloroethene	<1	<1	0.9	<1	<1	<1	<1	0.7	<1	<1	<1	<1	<1	<1	

Analytical Parameter (COCs)	Analytical Results (µg/L)														
	SV3-5 171cc	SV4-20 216cc	SV4-10 186cc	SV4-5 171cc	SV5-20 216cc	SV5-10 186cc	SV5-5 171cc	SV6-20 PV216cc	SV6-10 PV186cc	SV6-5 PV171cc	SV7-20 PV216cc	SV7-10 PV186cc	SV7-5 PV171cc		
<b>VOCs</b>															
1,1-Dichloroethene	<1	0.6	<1	<1	0.8	<1	<1	<1	<1	<1	<1	<1	<1		
1,1,1-Trichloroethane	<1	0.5	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1		
Freon-113	0.5	<1	0.4	0.5	<1	<1	<1	<1	<1	<1	<1	0.5	0.4		
Tetrachloroethene	0.6	22	<1	<1	9.1	0.5	<1	28	2.4	12	7.9	<1	<1		
Trichloroethene	<1	0.5	<1	<1	0.4	<1	<1	<1	<1	<1	<1	<1	<1		

Notes and acronym/symbol definitions are listed on page 2 of 2.

**Table 1: Soil-Vapor Analytical Data – Waste Storage Area<sup>1</sup>**  
(Page 2 of 2)

**Notes:**

- 1: Soil vapor-probe samples SV1-10 (1PV, 3PV and 7PV), SV1-20, SV1-5, SV2 through SV5 were collected by Mr. Robbie Bray on April 7, 2005 and analyzed for volatile organic compounds (using U.S. EPA Method 8260B) by H&P Mobile Geochemistry using their mobile laboratory. Oversight was provided by a BB&J Representative (i.e., Mr., Daniel T. Elliott, RG).
- 2: Soil vapor-probe samples SV1-5\*, SV1-10, SV1-10DUP, SV6, SV7 were collected by Mr. Robbie Bray on April 8, 2005 and analyzed for volatile organic compounds (using U.S. EPA Method 8260B) by H&P Mobile Geochemistry using their mobile laboratory. Oversight was provided by a BB&J Representative (i.e., Mr., Daniel T. Elliott, RG).
- 3: Only those COCs detected at concentrations exceeding the laboratory EQLs and/or RLs are listed in table.

**Acronym and Symbol Definitions**

SV:	soil vapor probe
-10:	sampling depth in feet below ground surface
PV:	purge volume
COC:	constituent of concern
VOCs:	volatile organic compounds
µg/L:	micrograms per Liter
18:	COC concentration exceeded applicable laboratory MDL
<	less than (i.e., not detected)
U.S. EPA:	United States Environmental Protection Agency
cc:	cubic centimeters
RLs:	reporting limits (laboratory)
EQLs:	estimated quantity limits (laboratory)
:	detected at a concentration exceeding the EQL, but is below the RL.

Prepared By/Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
Checked By/Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

**Table 2: Soil-Matrix Analytical Data – Waste Storage Area<sup>1</sup>**

Analytical Parameter (COCs)	Analytical Results					
	SB-2 (10')	SB-2 (25')	SB-6 (2.5')	SB-6 (5')	SB-6 (10')	SB-6 (25')
<b>VOCs (µg/kg)</b>						
Benzene	<2.00	<2.00	<2.00	<2.00	2.00	<2.00
Tetrachloroethene	26	14	194	16	16	<10.00
Toluene	<2.00	<2.00	<2.00	<2.00	3	<2.00
<b>Metals (mg/kg)</b>						
Arsenic	0.91	NA	2.73	NA	NA	NA
Barium	92.7	NA	111	NA	NA	NA
Cadmium	0.55	NA	0.58	NA	NA	NA
Chromium	17.5	NA	15.7	NA	NA	NA
Cobalt	9.90	NA	7.59	NA	NA	NA
Copper	18.1	NA	17.6	NA	NA	NA
Lead	3.46	NA	14.8	NA	NA	NA
Nickel	19.9	NA	19.8	NA	NA	NA
Silver	1.66	NA	1.83	NA	NA	NA
Vanadium	24.0	NA	29.3	NA	NA	NA
Zinc	44.7	NA	48.9	NA	NA	NA

Notes:

<sup>1</sup>: Soil matrix samples SB-2 (10'), SB-2 (25'), SB-6 (2.5'), SB-6 (5'), SB-6 (10') and SB-6 (25') were collected by Mr. Robbie Bray on April 8, 2005 and analyzed for volatile organic compounds (using U.S. EPA Method 8260B), and CCR Title 22 Metals (using U.S. EPA Method 6010B and 7471A) by American Scientific Laboratories, LLC of Los Angeles, California. Oversight was provided by a BB&J Representative (i.e., Mr., Daniel T. Elhott, R.G.).

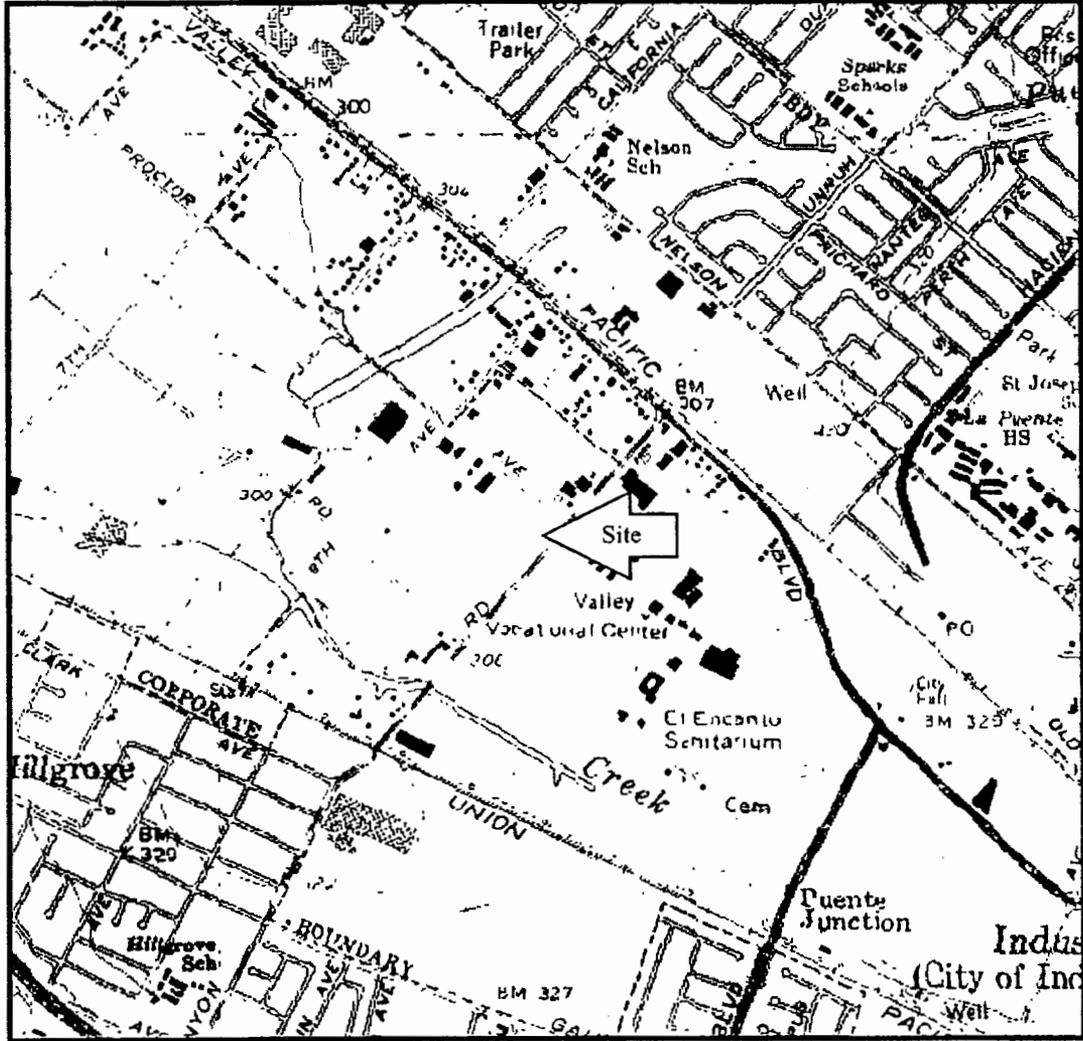
<sup>2</sup>: Only those COCs detected at concentrations exceeding the laboratory and PQLs are listed in table.

Acronym and Symbol Definitions:

- SB: soil boring
- (10'): sampling depth in feet below ground surface
- COC: constituent of concern
- VOCs: volatile organic compounds
- µg/kg: micrograms per Kilogram
- mg/kg: milligrams per Kilogram
- 18': COC concentration exceeded applicable laboratory MDL
- <: less than (i.e., not detected)
- U.S. EPA: United States Environmental Protection Agency
- PQLs: practical quantitative limits (laboratory)
- CCR: Code of California Regulations
- BB&J: Bradburne Briller & Johnson, LLC
- NA: not analyzed

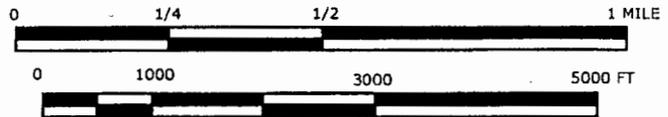
Prepared By/Date: \_\_\_\_\_/\_\_\_\_\_  
 Checked By/Date: \_\_\_\_\_/\_\_\_\_\_

Source: U.S. Geological Survey Baldwin Park, California Quadrangle,  
7.5 Minute Series (Topographic), Dated 1978.



California

Quadrangle Location



Prepared by/Date: \_\_\_\_\_ / \_\_\_\_\_  
Checked by/Date: \_\_\_\_\_ / \_\_\_\_\_

Calmar, Inc.  
333 Turnbull Canyon Road  
City of Industry, California

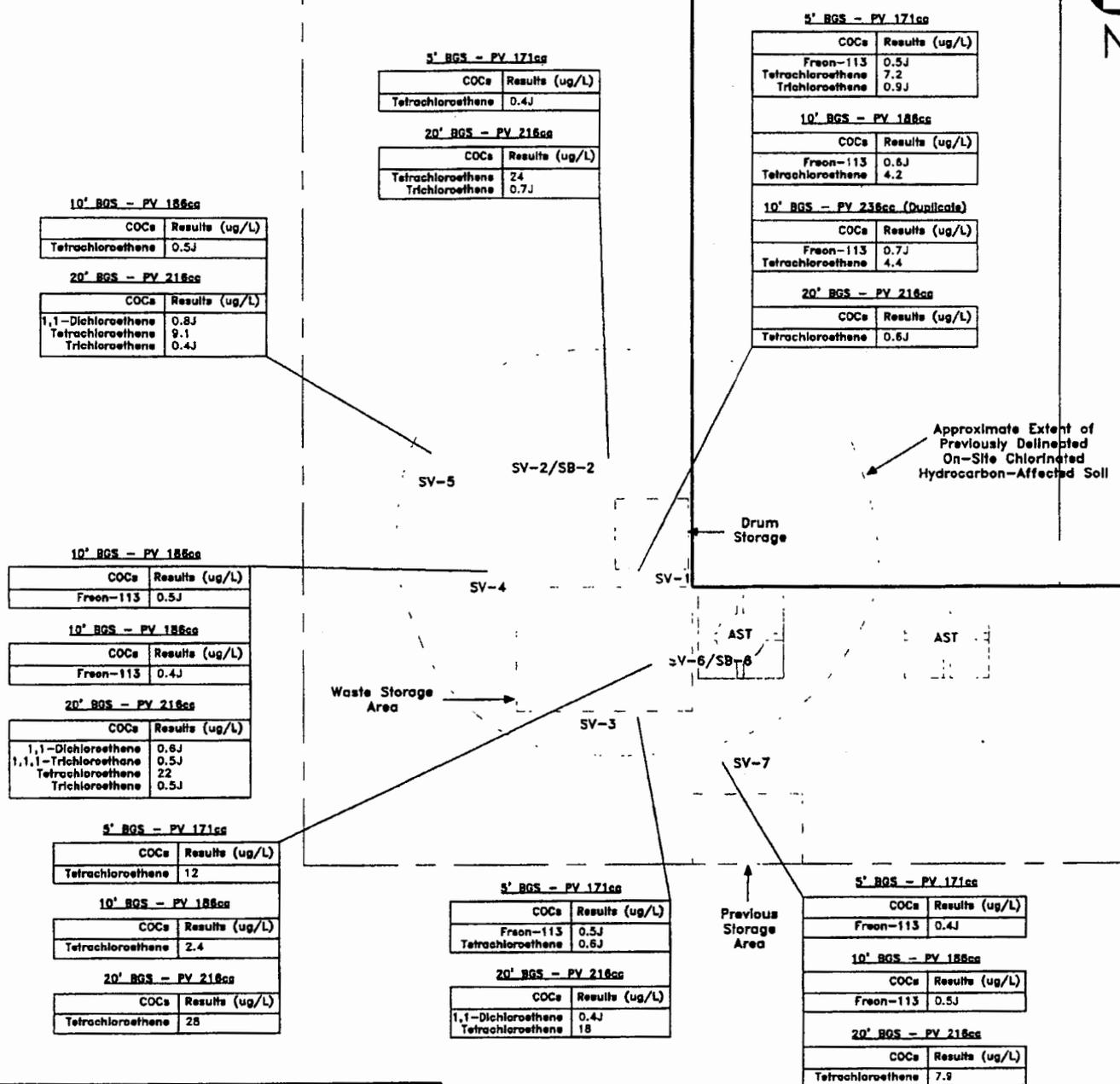


Bradburne, Brilller & Johnson, LLC  
Chicago Atlanta  
Boston Pittsburgh  
www.bbjgroup.com

Site Location Map

Project 0098704 Figure 1

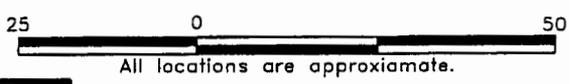
Source: Site reconnaissance performed by Bradburne, Briller & Johnson, LLC on April 7 and 8, 2005.



**LEGEND**

- SV-1 - Soil vapor probe location (April 2005)
- SB-1 - Soil boring location (April 2005)
- 10' BGS - Feet below ground surface
- COC - Constituent of concern
- ug/L - Micrograms per liter
- cc - Cubic centimeters
- 28 - COC concentration exceeded applicable laboratory reporting limit
- J - Detected at a concentration exceeding the estimated quantity limit, but is below the reporting limit

NOTE: Historical soil borings and/or soil vapor probes are colored in gray.



Prepared by/Date: \_\_\_\_\_ / \_\_\_\_\_  
 Checked by/Date: \_\_\_\_\_ / \_\_\_\_\_

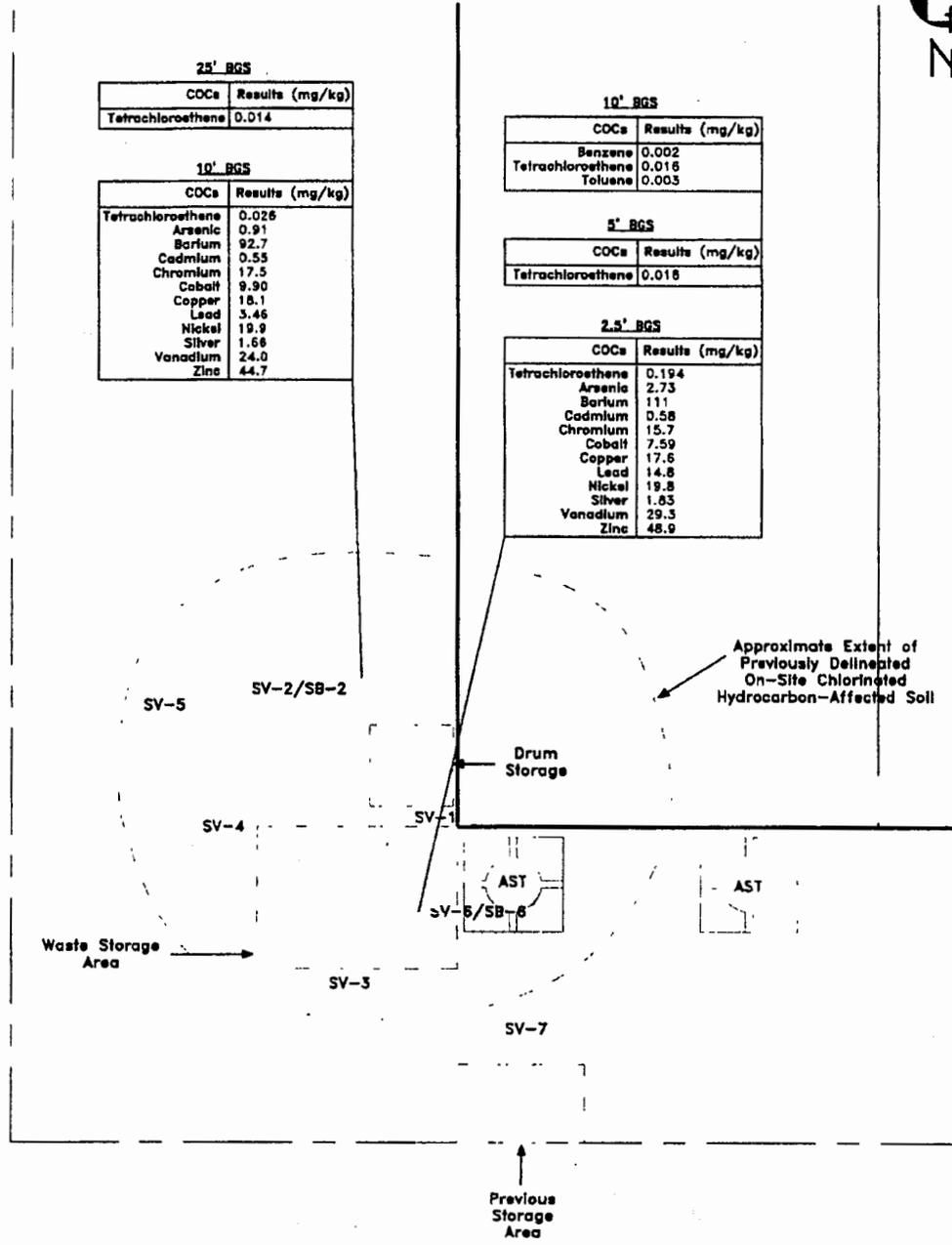
Calmar, Inc.  
 333 South Turnbull Road  
 City of Industry, California



Bradburne, Briller & Johnson, LLC  
 Chicago Atlanta  
 Boston Pittsburgh  
 www.bbgroup.com

Site Plan Showing Soil Vapor  
 Sampling Locations and Results  
 Project No. 0098704 Figure 2

Source: Site reconnaissance performed by Bradburne, Briller & Johnson, LLC on April 7 and 8, 2005.



**25' BGS**

COCs	Results (mg/kg)
Tetrachloroethene	0.014

**10' BGS**

COCs	Results (mg/kg)
Tetrachloroethene	0.026
Arsenic	0.91
Barium	92.7
Cadmium	0.55
Chromium	17.5
Cobalt	9.90
Copper	18.1
Lead	3.46
Nickel	19.9
Silver	1.66
Vanadium	24.0
Zinc	44.7

**10' BGS**

COCs	Results (mg/kg)
Benzene	0.002
Tetrachloroethene	0.016
Toluene	0.003

**5' BGS**

COCs	Results (mg/kg)
Tetrachloroethene	0.018

**2.5' BGS**

COCs	Results (mg/kg)
Tetrachloroethene	0.194
Arsenic	2.73
Barium	111
Cadmium	0.58
Chromium	15.7
Cobalt	7.59
Copper	17.6
Lead	14.8
Nickel	19.8
Silver	1.83
Vanadium	29.3
Zinc	48.9

**LEGEND**

- SV-1 - Soil vapor probe location (April 2005)
- SB-1 - Soil boring location (April 2005)
- 10' BGS - Feet below ground surface
- COC - Constituent of concern
- mg/kg - Milligrams per kilogram
- 0.91 - COC concentration exceeded applicable laboratory reporting limit

NOTE: Historical soil borings and/or soil vapor probes are colored in gray.



All locations are approximate.

Prepared by/Date: \_\_\_\_\_ / \_\_\_\_\_  
 Checked by/Date: \_\_\_\_\_ / \_\_\_\_\_

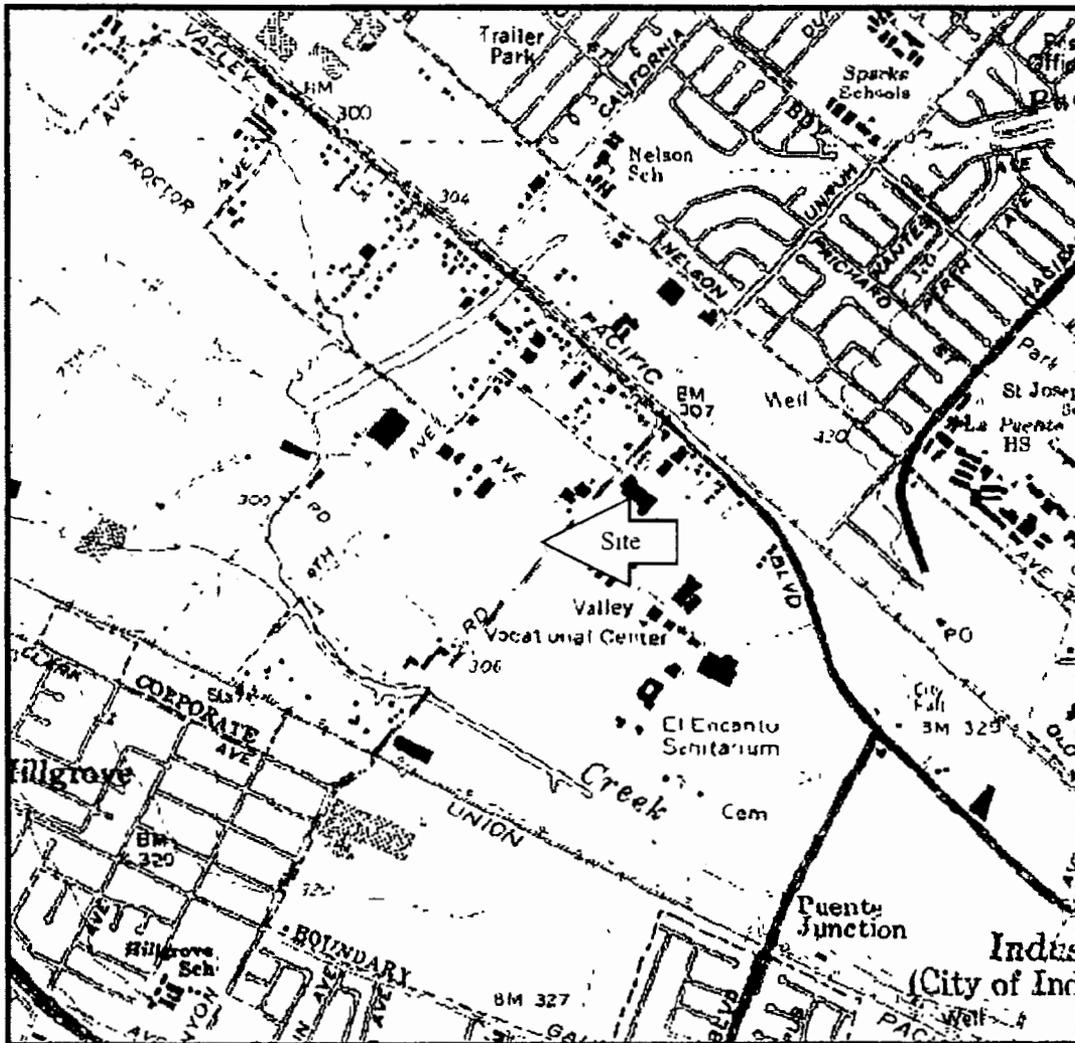
Calmar, Inc.  
 333 Turnbull Canyon Road  
 City of Industry, California



Bradburne, Briller & Johnson, LLC  
 Chicago Atlanta  
 Boston Pittsburgh  
 www.bbgroup.com

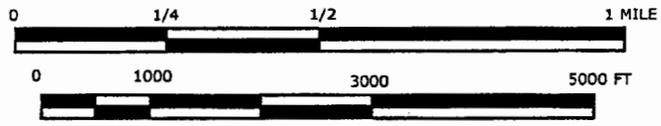
Site Plan Showing Soil Matrix  
 Sampling Locations and Results  
 Project No. 0098704 Figure 3

Source: U.S. Geological Survey Baldwin Park, California Quadrangle,  
7.5 Minute Series (Topographic), Dated 1978.



California

Quadrangle Location



Prepared by/Date: \_\_\_\_\_ / \_\_\_\_\_  
Checked by/Date: \_\_\_\_\_ / \_\_\_\_\_

Calmar, Inc.  
333 Turnbull Canyon Road  
City of Industry, California

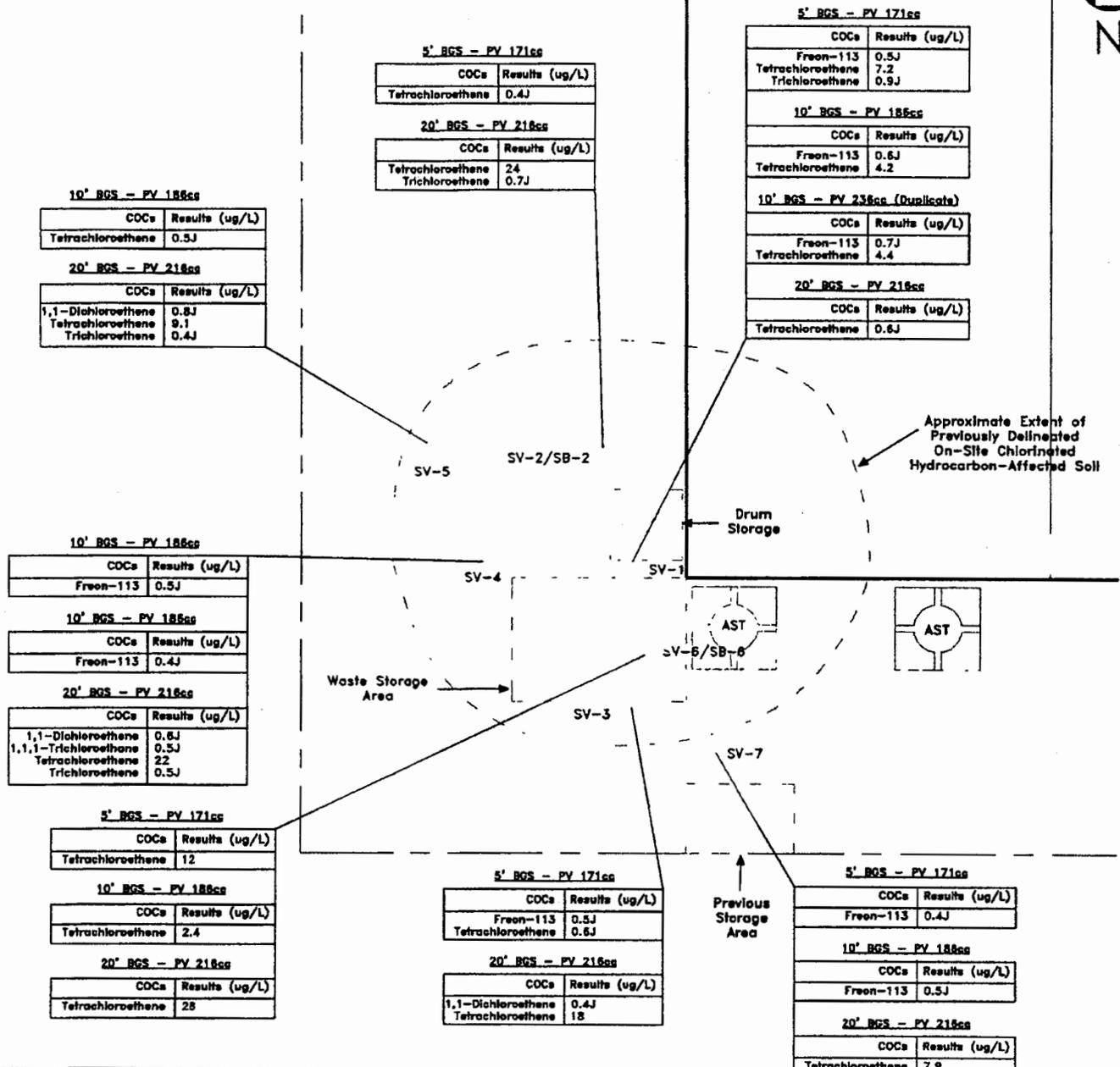


Bradburne, Briller & Johnson, LLC  
Chicago Atlanta  
Boston Pittsburgh  
www.bbjgroup.com

Site Location Map

Project 0098704 Figure 1

Source: Site reconnaissance performed by Bradburne, Briller & Johnson, LLC on April 7 and 8, 2005.



**LEGEND**

- SV-1 - Soil vapor probe location (April 2005)
- SB-1 - Soil boring location (April 2005)
- 10' BGS - Feet below ground surface
- COC - Constituent of concern
- ug/L - Micrograms per liter
- cc - Cubic centimeters
- 28 - COC concentration exceeded applicable laboratory reporting limit
- J - Detected at a concentration exceeding the estimated quantity limit, but is below the reporting limit

NOTE: Historical soil borings and/or soil vapor probes are colored in gray.



All locations are approximate.

Prepared by/Date: \_\_\_\_\_ / \_\_\_\_\_  
 Checked by/Date: \_\_\_\_\_ / \_\_\_\_\_

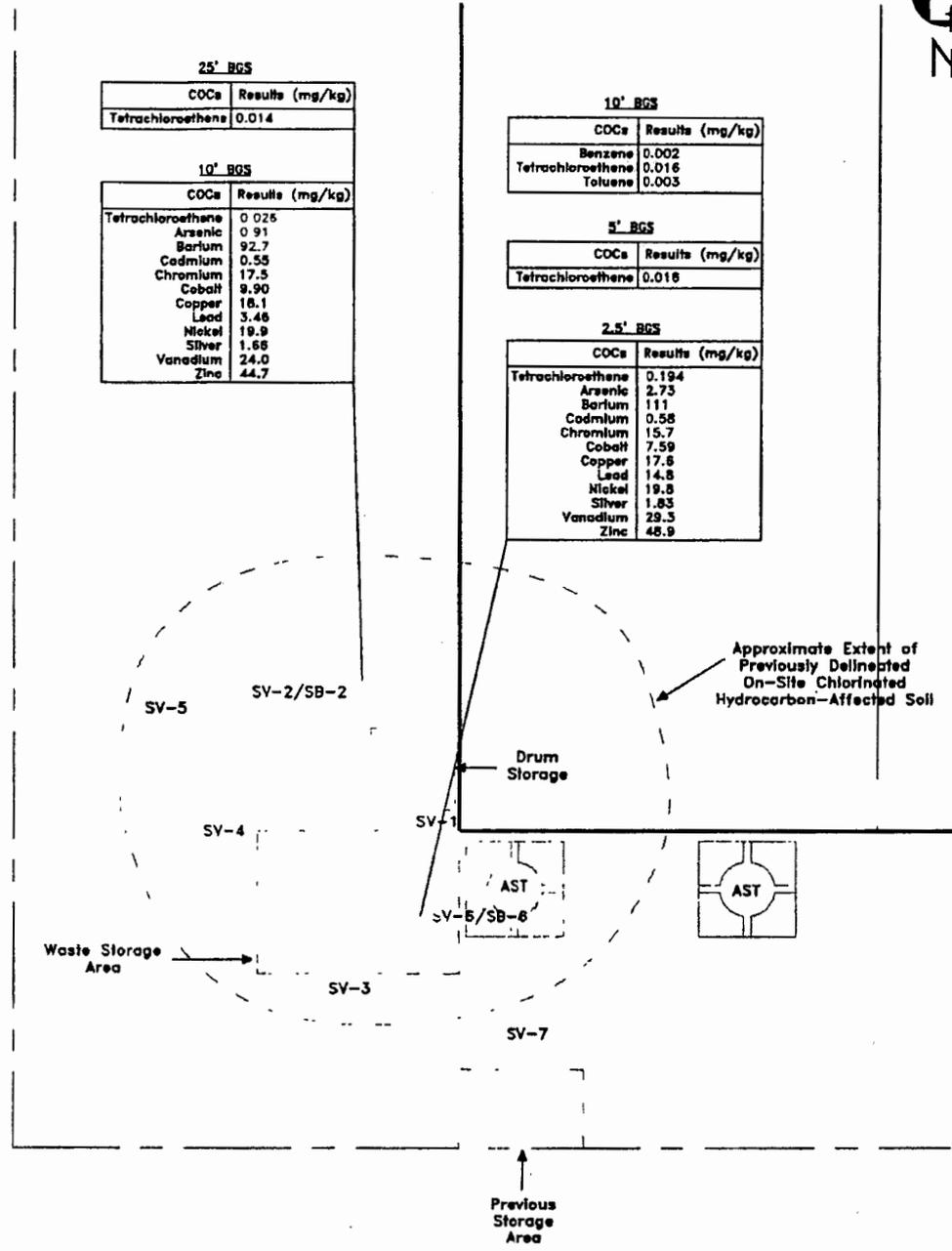
Calmar, Inc.  
 333 South Turnbull Road  
 City of Industry, California



Bradburne, Briller & Johnson, LLC  
 Chicago Atlanta  
 Boston Pittsburgh  
 www.bbgroup.com

Site Plan Showing Soil Vapor  
 Sampling Locations and Results  
 Project No. 0098704 Figure 2

Source: Site reconnaissance performed by Bradburne, Briller & Johnson, LLC on April 7 and 8, 2005.



25' BGS	
COCs	Results (mg/kg)
Tetrachloroethene	0.014

10' BGS	
COCs	Results (mg/kg)
Tetrachloroethene	0.025
Arsenic	0.91
Barium	92.7
Cadmium	0.55
Chromium	17.5
Cobalt	8.90
Copper	18.1
Lead	3.46
Nickel	19.9
Silver	1.68
Vanadium	24.0
Zinc	44.7

10' BGS	
COCs	Results (mg/kg)
Benzene	0.002
Tetrachloroethene	0.016
Toluene	0.003

5' BGS	
COCs	Results (mg/kg)
Tetrachloroethene	0.018

2.5' BGS	
COCs	Results (mg/kg)
Tetrachloroethene	0.194
Arsenic	2.73
Barium	111
Cadmium	0.58
Chromium	15.7
Cobalt	7.59
Copper	17.8
Lead	14.8
Nickel	19.8
Silver	1.83
Vanadium	29.3
Zinc	48.9

**LEGEND**

- SV-1 - Soil vapor probe location (April 2005)
- SB-1 - Soil boring location (April 2005)
- 10' BGS - Feet below ground surface
- COC - Constituent of concern
- mg/kg - Milligrams per kilogram
- 0.91 - COC concentration exceeded applicable laboratory reporting limit

NOTE: Historical soil borings and/or soil vapor probes are colored in gray.



All locations are approximate.

Prepared by/Date: \_\_\_\_\_ / \_\_\_\_\_  
 Checked by/Date: \_\_\_\_\_ / \_\_\_\_\_

Calmar, Inc.  
 333 Turnbull Canyon Road  
 City of Industry, California



Bradburne, Briller & Johnson, LLC  
 Chicago Atlanta  
 Boston Pittsburgh  
 www.bbgroup.com

Site Plan Showing Soil Matrix  
 Sampling Locations and Results  
 Project No. 0098704 Figure 3

**From:** "Valerie Baxa" <vbaxa@firstindustrial.com>  
**To:** "Valerie Baxa" <vbaxa@firstindustrial.com>, "Paul C. Owens" <powens@bbjgroup.com>  
**Date:** 4/1/05 10:10AM  
**Subject:** RE: Calmar

I just spoke to Alan Hsu. He indicated that we have verbal approval of the work plan and is copied on this email for verification.

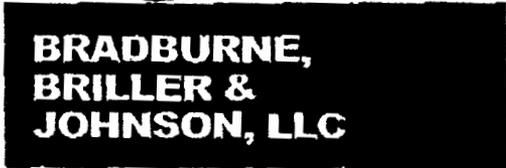
Please let Alan know when you are scheduling field work - he may stop by.

Call with questions

Valerie Baxa  
Director of Environmental  
First Industrial Realty Trust  
311 South Wacker Drive - Suite 4000  
Chicago, IL 60606  
(312) 344-4393 (phone)  
(312) 895-9393 (fax)

**CC:** "Tim Bradburne" <tbradburne@bbjgroup.com>, "Benjamin Olszewski" <bolszewski@firstindustrial.com>, <ahsu@waterboards.ca.gov>

162 North Franklin Street, Chicago, Illinois 312-726-8556, ext 213  
312-726-8514 FAX



# Fax

<b>To:</b> Alan Hsu	<b>From:</b> Deb Orr	(312) 726 8556
<b>Fax:</b> 213-576-6717	<b>Pages:</b> 3	
<b>CO:</b>	<b>Date:</b> 10.13.2004	
<b>Re:</b> Calmar paperwork	<b>CC:</b> Dan Elliot	

Urgent     For Review     Please Comment     Please Reply     Please Recycle

● **Comments**

Alan-

It was brought to my attention by Dan Elliot that you have not received the signed paperwork from our client, First Industrial Realty Trust regarding the Calmar Site at 333 S. Turnbull Canyon Road in City of Industry Here are the forms:

*Certification Declaration for Compliance with Fee Title Holder Notification Requirements*

*Acknowledgement of Receipt of Oversight Cost Reimbursement Account Letter*

If needed, an additional original of these forms can be provided as well. Please feel free to call Paul Owens at 978-834-0798 or myself with any questions.

Regards,

Deb Orr



# California Regional Water Quality Control Board Los Angeles Region



Terry Tammineu  
Secretary for  
Environmental  
Protection

Over 51 Years Serving Coastal Los Angeles and Ventura Counties  
Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

Arnold Schwarzenegger  
Governor

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.swrcb.ca.gov/rwqcb4>

ATTACHEMENT 3

## CERTIFICATION DECLARATION FOR COMPLIANCE WITH FEE TITLE HOLDER NOTIFICATION REQUIREMENTS (California Water Code, Section 13307.1)

Please Print or Type

Fee Title Holder(s): First Industrial Limited Partnership

Mailing Address: 311 S. Wacker Drive - SLIC 4000 - Chgo, IL 60606

Contact Person: Valerie Baxa

Telephone Number / Fax Number: 312-344-4393 / 312-895-9393

Site Name: Former Calmar Incorporated Facility

Address: 333 Turnbull Canyon Road, City of Industry, CA

Contact Person: Valerie Baxa

Telephone Number / Fax Number: 312-344-4393 / 312-895-9393

File Number: WIP/SLIC, File No. 102.0055

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." (See attached page for who shall sign the Certification Declaration).

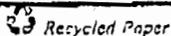
BERNARD A. BAK  
Printed Name of Person Signing

VICE PRESIDENT  
Official Title

B.A. Bak  
Signature

SEPTEMBER 17, 2004  
Date Signed

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations



# California Regional Water Quality Control Board Los Angeles Region



My Tamminen  
Secretary for  
Environmental  
Protection

Over 51 Years Serving Coastal Los Angeles and Ventura Counties  
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320 W 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 Internet Address <http://www.swrcb.ca.gov/rwqcb4>

ATTACHMENT 4

## ACKNOWLEDGMENT OF RECEIPT OF OVERSIGHT COST REIMBURSEMENT ACCOUNT LETTER

I, Valerie Baxa, acting within the authority vested in me as an authorized representative of First Industrial Realty Trust, a corporation, acknowledge that I have received and read a copy of the attached *REIMBURSEMENT PROCESS FOR REGULATORY OVERSIGHT* and the cover letter dated August 16, 2004 concerning cost reimbursement for Regional Board staff costs involved with oversight of cleanup and abatement efforts at Former Calmar Incorporated Facility, 333 South Turnbull Canyon Road, City of Industry, California.

I understand the reimbursement process and billing procedures as explained in the letter. Our company is willing to participate in the cost recovery program and pay all subsequent billings in accordance with the terms in your letter and its attachments, *and to the extent required by law*. I also understand that signing this form does not constitute any admission of liability, but rather only an intent to pay for costs associated with oversight, *as set forth above, and to the extent required by law*. Billings for payment of oversight costs should be mailed to the following individual and address:

BILLING CONTACT Valerie Baxa

BILLING ADDRESS 311 South Wacker Drive - Suite 4000  
Chicago, IL 60606

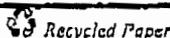
TELEPHONE NO. 312-344-4393 FAX NO. 312-895-9393

RESPONSIBLE PARTY'S SIGNATURE Valerie Baxa (Signature)  
Director of Environmental (Title)

DATE: 9/15/04

WIP/SLIC FILE NO. 102.0055, SITE ID NO. (to be assigned)

California Environmental Protection Agency



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Terry Tamminen  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board Los Angeles Region

Over 51 Years Serving Coastal Los Angeles and Ventura Counties

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320 W 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.swrcb.ca.gov/rwqcb4>



Arnold Schwarzer  
Governor

August 16, 2004

Ms. Valerie A. Baxa  
First Industrial Realty Trust, Inc.  
311 South Wacker Drive, Suite 4000  
Chicago, Illinois 60606

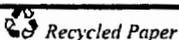
**SPILLS, LEAKS, INVESTIGATIONS AND CLEANUPS (SLIC) OVERSIGHT COST REIMBURSEMENT ACCOUNT – FORMER CALMAR INCORPORATED FACILITY, 333 SOUTH TURNBULL CANYON ROAD, CITY OF INDUSTRY, CALIFORNIA (FILE NO. 102.0055)**

Dear Ms. Baxa:

The California Water Code (CWC), Section 13304, allows the Regional Water Quality Control Board (Regional Board) to recover reasonable expenses from the responsible party to oversee cleanup of unregulated releases which adversely affect the State's waters. In response to your letter dated July 28, 2004 and the project discussion with your consultant, Mr. Dan Elliot of ECS Environmental Services on July 16, 2004, Regional Board staff have prepared this letter to assist you to establish a cost recovery account for the subject project with the State of California.

Based on the submitted information filed with the Regional Board, the soil and groundwater beneath the site is impacted with tetrachloroethene (PCE), and trichloroethene (TCE). Up to 210 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ ) of PCE and 350  $\mu\text{g}/\text{kg}$  of TCE were detected in the soil matrix samples collected from the Former Calmar Incorporated Facility (SITE). Maximum concentration of volatile organic compounds (VOCs) in soil vapors was reported as 2,000 micrograms per liter ( $\mu\text{g}/\text{L}$ ) of PCE and 810  $\mu\text{g}/\text{L}$  of TCE. In groundwater, 410  $\mu\text{g}/\text{L}$  of PCE and 260  $\mu\text{g}/\text{L}$  of TCE were detected. The release of chemicals has degraded the groundwater quality and beneficial uses of the State's waters. There have assessment and remediation work been completed and oversight by the Regional Board since 1994 under a cooperative agreement between the United States Environmental Protection Agency (USEPA) and the Regional Board. Due to the lack of continuous funding source from USEPA, you are required to execute the SLIC oversight cost recovery agreement with the State of California to proceed your request for closure.

**California Environmental Protection Agency**



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

### **Estimate of Work to be Performed**

The Regional Board staff estimates the following work will be done for your SITE during the Regional Board's 2004/2005 fiscal year (July 1, 2004 to June 30, 2005):

1. Review site investigation workplan;
2. Review request for closure and the associated submittals;
3. Review project file for the soil and groundwater contamination;
4. Prepare case review form for closure;
5. Conduct site inspection and communicate findings and inquiries to responsible parties;
6. Conduct internal and external communications (i.e. meetings, memos) about the site; and
7. Prepare closure letter.

### **Statement of Expected Outcome**

The expected outcome of work that will be performed includes providing written comments on the submitted reports and workplans, verifying the adequacy of reports, and determining the need to further investigate the impact to soil and groundwater. If the assessment and remediation are completed, a closure letter will be issued for the subject site.

### **Billing Rates**

Attached are the Spills, Leaks, Investigations, and Cleanups (SLIC) Program, Monthly Salary Scales by Job Classification (Attachment 1) for employees expected to perform the work and the Reimbursement Process for Regulatory Oversight (Attachment 2). The names and classifications of employees that charge time to this site will be listed on the invoices. The average billing rate is about \$90.00 per hour.

### **Estimation of Expected Charges**

Regional Board staff expects to charge about 100 hours for work related to this site during fiscal year 2004/2005. Based on the average billing rate of \$90 per hour, the estimated billing charge for this site during this fiscal year is about \$9,000. Please note that this is neither a commitment nor a contract for regulatory oversight. It is only an estimate of the work, which may be performed. Furthermore, we anticipate that there may be possible delays in Regional Board staff's review of reports submitted.

Ms. Valerie A. Baxa  
First Industrial Realty Trust, Inc.

- 3 -

August 16, 2004

### **Landowner Notification and Participation Requirements**

Pursuant to Division 7 of the Porter Cologne Water Quality Control Act under section 13307.1, the Regional Board is required to notify all current fee title holders for the subject site prior to considering corrective action or granting case closure. Therefore, you are required to provide the name, mailing address and telephone number for all record fee title holders for the site together with a copy of county record of current ownership, available from the County Recorder's Office, or complete the attached Certification Declaration Form (Attachment 3) and submit it to our office.

Please sign and return the enclosed "Acknowledgment of Receipt of Cleanup and Abatement Cost Recovery Letter" (Attachment 4) and the landowner's information to the Regional Board by **September 17, 2004**. If you have any questions, please contact Mr. Alan Hsu at (213) 576-6731 or Dr. Rebecca Chou at (213) 576-6733.

Sincerely,



Jonathan Bishop  
Interim Executive Officer

- Attachments:
1. Monthly Salary Scales by Job Classification
  2. Reimbursement Process for Regulatory Oversight
  3. Certification Declaration Form
  4. Acknowledgment of Receipt of Cleanup and Abatement Cost Recovery Letter

cc: (w/o attachments)  
Ms. Penny McDaniel, USEPA, Region IX, San Francisco  
Mr. Tim Bradburne, Bradburne, Briller & Johnson, LLP  
Mr. Dan Elliot, ECS Environmental Services, Inc.

***California Environmental Protection Agency***

 Recycled Paper

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# WIP

## MAIL CHECKLIST-KEEP ON TOP

11

EXECUTIVE OFFICER to Sign

SITE ID# \_\_\_\_\_

File

P C A# 16107 77401

Return File to ORIGINATOR

Originator AH

Mail out by 8/16/04

Spellcheck by ORIGINATOR yes

ADDRESSEE: Ms. Valerie Baxa, First Industrial Realty

FILE# WIP File No. 102.0055 (Former Calmar Facility)

ENCLOSURES: Attachment 1, 2, 3, 4 (for cost recovery account establishment)

COPIES TO:	HOW MANY?	
STAFF <u>X</u>	<u>1</u>	(Addrs)
FILE <u>X</u>	<u>1</u>	
RF <u>X</u>	<u>2</u>	
MAILING LIST <u>3 (w/o enclosed)</u>	<u>3</u>	
SUPERVISOR <u>DAB, JB, AH</u>	<u>3</u>	
OTHER <u>JA</u>	<u>1</u>	

Dan Elliot  
Principal  
ECS, Inc.  
8418 Pinelake Drive  
West Hills, CA 91304  
(818) 884-2978

MAIL CONTROL LOG# \_\_\_\_\_

REPORTING REQUIREMENTS:		YES	NO
<input checked="" type="checkbox"/> INSPECTION REPORT		YES	NO <u>X</u>
<input checked="" type="checkbox"/> BACKGROUND MEMO		YES	NO <u>X</u>
<input checked="" type="checkbox"/> TRACKING SHEET		YES	NO <u>X</u>
<input type="checkbox"/> NAME CHANGE			

### APPROVED FOR MAILOUT

<u>AH</u> <u>11/04</u>	<u>[Signature]</u> <u>8/17/04</u>	<u>[Signature]</u> <u>8/16/04</u>	<u>[Signature]</u> <u>8/16/04</u>	<u>[Signature]</u> <u>8/16/04</u>	<u>[Signature]</u> <u>8/16/04</u>	<u>AUG 19 2004</u>	DISK: TITLE:
ORIGINATOR	SENIOR	RG	SUPERVISOR	OCC	EO	MAILOUT DATE	



FIRST INDUSTRIAL REALTY TRUST, INC  
311 South Wacker Drive  
Suite 4000  
Chicago, Illinois 60606  
312/344-4300  
Fax 312/922-6320

July 28, 2004

H. Alan Hsu  
Sanitary Engineering Associate  
Los Angeles Regional Water Quality Control Board (LARWQCB)  
320 W. 4<sup>th</sup> Street, # 200  
Los Angeles, California, 90013  
(213) 576-6731

RE: Former Calmar Incorporated Facility  
333 South Turnbull Canyon Road  
City of Industry, California

Dear Mr. Hsu:

First Industrial Realty Trust, Inc. acquired the above-referenced property on December 23, 2003 and contractually accepted responsibility for obtaining closure for the soils at the property.

We have engaged Bradburne Briller and Johnson (BB&J) as our consultants to complete this closure. BB&J is also working with a local firm ECS to facilitate the process.

Please forward any/all future correspondence to my attention at the addresses listed below:

Valerie A. Baxa  
Director of Environmental  
First Industrial Realty Trust, Inc.  
311 South Wacker Drive - Suite 4000  
Chicago, IL 60606  
(312) 344-4393

With copies to the following consultants:

Tim Bradburne  
Principal  
Bradburne, Briller & Johnson  
162 North Franklin Street - 4th Floor  
Chicago, IL 60606  
(312) 726-8556

Dan Elliot  
Principal  
ECS, Inc.  
8418 Pinelake Drive  
West Hills, CA 91304  
(818) 884-2978

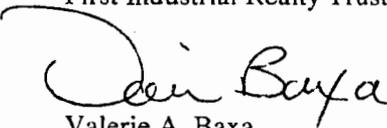
In order to facilitate this process and in light of California's current budget situation, I am very open to hearing more about the CRWQCB cost recovery program.

I understand that you spent a generous amount of time discussing our options with Dan Elliot of ECS. We appreciate your time and direction in this matter to date and look forward to working with you to get this closed as quickly as possible.

If you have any questions, please do not hesitate to contact me at (312) 344-4393.

Sincerely,

First Industrial Realty Trust, Inc.



Valerie A. Baxa  
Director of Environmental

cc: Tim Bradburne - Bradburne, Briller & Johnson  
Dan Elliot - ECS, Inc.



BRADBURNE  
BRILLER &  
JOHNSON, LLC

10 d. 0 5

March 23, 2004

Mr. Dixon Oriola  
California Regional Water Quality Control Board  
Los Angeles Region  
320 W 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

5 11:10:24

Re: **Work Plan for Site Investigation**  
**CALMAR Facility**  
**333 Turnbull Canyon Road**  
**City of Industry, CA**  
**BB&J Project No. 10115.0098704**

Dear Mr. Oriola:

Enclosed please find three copies of the *Site Investigation Work Plan* (Work Plan) for the CALMAR facility. This Work Plan includes an additional soil gas/boring investigation to obtain data for soil closure and includes testing for the emergent chemicals.

We appreciate your assistance in this matter. Please call Mr. Daniel T. Elliott at (818) 884-2978 or Mr. Paul C. Owens at (978) 834-0798 if you have any further questions.

Sincerely,

BRADBURNE, BRILLER & JOHNSON, LLC

Daniel T. Elliott, RG - 4129  
Principal Geologist

Paul C. Owens, P.G.  
Principal Geologist

**Forensic Environmental Services, Inc.**  
113 John Robert Thomas Drive  
The Commons at Lincoln Center  
Exton, Pennsylvania 19341

Telephone: (610) 594-3940

Telecopier: (610) 594-3943

October 31, 2003

Mr. Dixon Oriola  
Unit Chief, Well Investigation Program  
California Regional Water Quality Control Board  
320 W. 4th Street, Suite 200  
Los Angeles, California 90013

Subject: Soil and Ground-Water Data Supporting No Further Action Status  
Calmar Inc., 333 Turnbull Canyon Road, City of Industry, California  
File No. 102.0055

Dear Mr. Oriola:

Ms. Lauren Alterman, on behalf of Calmar, Inc., submitted a letter dated October 17, 2003 documenting her discussions with you regarding issuance of a "No Further Action" letter for the subject site. At that time, you requested Calmar provide your office with recent data regarding the contamination in question.

Per our conversation today, attached is a summary of soil and ground-water quality data prepared by Forensic Environmental Services (FES) for the subject site to assist the RWQCB in evaluating this request. I understand that Ms. Castennata is on extended leave and that another case manager will be assigned to review this document, which is not expected to be completed until mid- to late-November. I will plan on contacting you during the week of November 17 to check on the status of the RWQCB review.

Sincerely;

FORENSIC ENVIRONMENTAL SERVICES, INC.

  
Nicholas J. DeSavo  
Senior Project Manager

cc: Lauren Alterman

DATE	DATE	TO/FROM	SUBJECT	STAFF
01-06-99	06-19-97	Calmar/RB	RAP Approval	
01-06-99	07-09-97	RB/LEVIN-FRICKE	Response to 06-19-97 Letter	
01-06-99	12-03-97	RB/LEVIN-FRICKE	Groundwater Monitoring Report	
01-06-99	12-03-97	RB/LEVIN-FRICKE	VES Pilot Test Results	
01-06-99	06-17-98	RB/LEVIN-FRICKE	WP for Additonal VES Pilot Test	
01-06-99	09-24-98	Calmar/RB	Request VES Pilot Test Data	YL
01-06-99	10-23-98	RB/LEVIN-FRICKE	Submittal of 2nd VES Pilot Test Data	YL
	01-07-99	File	Rev. off the 12-03-98 Rpt.	"
	1-25-99	RB / LFR	USEPA guidelines on RNA	"
	2-3-99	" "	1998 annual gw data report	"
	2-9-99	File	Report Review Form	"
	3-2-99	RB / Calmar	Grand Deed copy	"
	3-22-99	Calmar / RB	Workplan Requirement	"
	3-23-99	RB / Calmar	"	"
	3-31-99	RB / attorney	Request cc's	"
	4-6-99	Calmar / RB	Workplan approval	"
	6-15-99	RB / Calmar	SG monitoring Report	"
	6-21-99	File	" " " Review	"
	9-23-99	RB / Calmar	" " " "	"
	9-27-99	File	" " " Review	"
	1-10-00	RB / Calmar	Annual GW Monitoring Rpt.	"
	1-10-00	" "	SG Monitoring Report	"
	2-17-00	File	" " " Review	"
	5-23-00	RB / Calmar	" " " "	"
	5-31-00	File	" " " Review	"
	5-31-00	"	1-10-00 Rpt. Review	"

DATE	DATE	TO/FROM	SUBJECT	STAFF
01-06-99	05-07-93	File	File Review Form	
01-06-99	05-12-93	RB/LEVIN-FRICKE	Field Work Notice	
01-06-99	06-09-93	RB/LEVIN-FRICKE	Draft Soil Gas Data	
01-06-99	12-01-93	RB/LEVIN-FRICKE	No More BTEX Testing	
01-06-99	12-16-93	Calmar/RB	OK with No BTEX Testing	
01-06-99	11-28-94	File	File Review Form	
01-06-99	01-03-95	RB/LEVIN-FRICKE	Soil and Groundwater Report	
01-06-99	04-25-95	RB/LEVIN-FRICKE	Data Report for Groundwater Sampling	
01-06-99	05-16-95	RB/LEVIN-FRICKE	Data Report for Groundwater Monitoring	
01-06-99	06-21-95	Calmar/RB	Review of Reports	
01-06-99	08-25-95	RB/LEVIN-FRICKE	WP for Evaluating Soil Cleanup Level	
01-06-99	10-11-95	Calmar/RB	WP Approval	
01-06-99	12-08-95	RB/LEVIN-FRICKE	Extension Request	
01-06-99	01/30/96	RB/LEVIN-FRICKE	Extension Request	
01-06-99	03-06-96	RB/LEVIN-FRICKE	Extension Request	
01-06-99	08-15-96	File	Phone Memo	
01-06-99	11-21-96	RB/LEVIN-FRICKE	Data Report for Groundwater Monitoring	
01-06-99	01-08-97	Calmar/RB	Required RAP	
01-06-99	02-18-97	RB/LEVIN-FRICKE	WP for Additional Soil Assessment	
01-06-99	03-10-97	Calmar/RB	WP Approval	
01-06-99	03-31-97	RB/LEVIN-FRICKE	Field Work Notice	
01-06-99	04-09-97	File	Site Visit Note	
01-06-99	05-06-97	File	File Review Form	
01-06-99	05-21-97	RB/LEVIN-FRICKE	Data Report for Groundwater Monitoring	
01-06-99	06-12-97	RB/LEVIN-FRICKE	Site Ass. Report and RAP	

FILE REVIEW FORM

I. TO BE FILLED OUT BY PERSON RECEIVING REQUEST

Request Received By: Cindy x6633 Date: 10/16/03

Person(s) who wish to review file(s) Phone number Representing

DEBRA ORR 312 726-8556 B B + J

WIP FILE

Purpose: To review file

Files to be reviewed: CALMAR FACILITY ; City of Industry

Appointment requested for: Date 10/16/03 Time: 10<sup>00</sup>

II. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT

Appointment: Date 10/16/03 Time(s) 10<sup>00</sup>

Staff Contact: Raul Lima Staff time expended: \_\_\_\_\_

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SIGNATURE OF REVIEWER: X Debra ORR

**FILE REVIEW FORM—PLEASE READ BEFORE REVIEWING FILES**

Unit WIP

**1. TO BE FILLED OUT BY PERSON RECEIVING REQUEST**

Request Received by: Lima Date: 10/15/3

Person(s) who wish To review File (s)	Phone Number	Representing
<u>Robb Orr</u>	_____	_____
_____	_____	_____

Purpose:  File Review       Copy Service       Both       Circle One Please

Files to be reviewed Calmar

**2. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT**

Appointment: Date: 10.16.03 Time: 10:30

Staff Contact: Raul Lima

Phone: \_\_\_\_\_

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It is the policy of the WIP and LF units that 5 file folders or 5 boxes be reviewed per request per session with a mandatory 1 day break between review sessions. We apologize for any inconvenience. Thank you!!!!!!

Copy Service Signature \_\_\_\_\_

Reviewer Signature [Signature]

**From:** "Deb Orr" <dorr@bbjgroup.com>  
**To:** "Dixon Oriola" <DORIOLA@rb4.swrcb.ca.gov>  
**Date:** 10/3/03 12:00PM  
**Subject:** Contact info

Dixon,

As we discussed, here is the contact info for the potential purchaser of the Calmar property. Thanks again for talking with us this morning. Sounds as though we are making some significant progress.

Ms. Valerie Baxa  
Environmental Risk Manager  
First Industrial Realty Trust  
311 S Wacker Street  
Suite 4000  
Chicago, IL 60606  
Phone 312-344-4393  
Fax 312-895-9393

vbaxa@firstindustrial.com

Thanks again Dixon.

Debra D. Orr, CHMM  
Bradburne, Briller & Johnson, LLC  
162 North Franklin Street 4th Floor  
Chicago, IL 60606  
Voice (312) 726-8556 Ext. 213  
Fax (312) 726-8514  
Email dorr@bbjgroup.com

**CC:** "Angelica Castaneda" <acastane@rb4.swrcb.ca.gov>

**From:** "Hamann, Martin" <Martin.Hamann@lfr.com>  
**To:** "Dixon Oriola (E-mail)" <doriola@RB4.swrcb.ca.gov>  
**Date:** 5/23/02 1:48PM  
**Subject:** RE: Emergent Chemical Sampling

Hi, Dixon:

This email was prepared in response to the April 25, 2002 letter sent to my client regarding emergent chemical sampling and our telephone discussion regarding that letter.

The client is Saint Gobain Calmar at 333 Trunbull Canyon Road, City of Industry, CA 91745 (File No. 102.0055).

After additional discussions with my client, we thought we should collect more samples from the wells to get more complete coverage of emergent chemicals. LFR is proposing to analyze wells MW-1, MW-4, MW-7, and PZ-2 instead of MW-1 and MW-2 alone.

If this is acceptable to you or if you require any modifications, please contact me at 714-444-0111.

Very truly yours,

Martin E. Hamann, R.G., C.H.G.  
Senior Associate Hydrogeologist  
Geoscience Group Manager

-----Original Message-----

From: Hamann, Martin  
Sent: Monday, May 20, 2002 3:31 PM  
To: Dixon Oriola (E-mail)  
Subject: Emergent Chemical Sampling

Dear Mr. Oriola:

This email was prepared in response to the April 25, 2002 letter sent to my client regarding emergent chemical sampling and our telephone discussion regarding that letter.

The client is Saint Gobain Calmar at 333 Trunbull Canyon Road, City of Industry, CA 91745 (File No. 102.0055).

As we discussed last week, Calmar is requesting that two of its wells (MW-1 and MW-2) be sampled to meet the requirements of the April 25, 2002 letter. These wells are located across their site and will be expected to provide the RWQCB with the required information regarding emergent chemicals. The attached figure shows the locations of the wells.

Both of these wells will be analyzed for perchlorate, NDMA, 1,4-dioxane and hex and total chromium in accordance with the test methods and reporting limits stated in the letter. We tentatively expect to collect these samples on June 5th.

Sent: Monday, May 20, 2002 3:31 PM  
To: Dixon Oriola (E-mail)  
Subject: Emergent Chemical Sampling

Dear Mr. Oriola:

This email was prepared in response to the April 25, 2002 letter sent to my client regarding emergent chemical sampling and our telephone discussion regarding that letter.

The client is Saint Gobain Calmar at 333 Trunbull Canyon Road, City of Industry, CA 91745 (File No. 102.0055).

As we discussed last week, Calmar is requesting that two of its wells (MW-1 and MW-2) be sampled to meet the requirements of the April 25, 2002 letter. These wells are located across their site and will be expected to provide the RWQCB with the required information regarding emergent chemicals. The attached figure shows the locations of the wells.

Both of these wells will be analyzed for perchlorate, NDMA, 1,4-dioxane and hex and total chromium in accordance with the test methods and reporting limits stated in the letter. We tentatively expect to collect these samples on June 5th.

If this is acceptable to you or if you require any modifications, please contact me at 714-444-0111.

Very truly yours,

Martin E. Hamann, R.G., C.H.G.  
Senior Associate Hydrogeologist  
Geoscience Group Manager

**FILE REVIEW FORM**

**I. TO BE FILLED OUT BY PERSON RECEIVING REQUEST**

Request Received by: CEASAR NWADIWE Date: 01/10/01

Person (s) who wish to review file (s) Phone number Representing

KIRK THOMSON (949) 457 9664

Purpose: FOR FILE REVIEW

Files to be reviewed: FILE # 102.0016, 102.0048, 102.0003,  
102.0025, 102.0002, 102.0176, 102.0015, 102.0007,  
102.0055, 102.0224

Appointment requested for: Date: 01/12/01 Time: 8.00 AM

**II. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT**

Appointment: Date: 01/12/01 Time (s): 8.00 AM -

Staff Contact: CEASAR NWADIWE Staff time expended: \_\_\_\_\_

Phone: (213) 576 5728

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SIGNATURE OF REVIEWER: +

**REVIEW FORM**

**I. TO BE FILLED OUT BY PERSON RECEIVING REQUEST**

Request Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Person (s) who wish to review file (s)	Phone number	Representing
<u>Denver</u>	_____	_____
<u>Montro</u>	_____	_____

Purpose: \_\_\_\_\_

Files to be reviewed: Calmar

Appointment requested for: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

**II. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT**

Appointment: \_\_\_\_\_ Date: \_\_\_\_\_ Time (s): \_\_\_\_\_

Staff Contact: \_\_\_\_\_ Staff time expended: \_\_\_\_\_

Phone: \_\_\_\_\_

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SIGNATURE OF REVIEWER: *[Signature]*

FILE REVIEW FORM

I. TO BE FILLED OUT BY PERSON RECEIVING REQUEST

Request Received By: C. NWADUKWE Date: 05/31/00

Person(s) who wish to review file(s) Phone number Representing

BRIAN BELTE 818-509 1101(316) ENVIRON. STRATEGIES CORP.

Purpose: FILE REVIEW

Files to be reviewed: SPECTROL ELECTRONICS FILE #105.0260  
UTILITY TRAILERS CO. FILE #105.0295,  
TELEDYNE CASTING PRODUCT FILE #105.0276

Appointment requested for: Date 06-02-00 Time: 8:00 AM

II. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT

Appointment: Date 06-02-00 Time(s) 8:00 AM

Staff Contact: \_\_\_\_\_ Staff time expended: \_\_\_\_\_  
Phone : \_\_\_\_\_

Staff contact should be readily available when files are being reviewed

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SIGNATURE OF REVIEWER: \_\_\_\_\_



# California Regional Water Quality Control Board

## Los Angeles Region



**Winston H. Hickox**  
Secretary for  
Environmental  
Protection

320 W 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640  
Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>

**Gray Davis**  
Governor

### MEMORANDUM

**TO:** Case File of Calmar (102.0055)  
**FROM:** Yi Lu  
**DATE:** May 31, 2000  
**SUBJECT:** Report Review

Regional Board staff has reviewed an annual groundwater monitoring report dated 01/10/00, submitted by Levine-Fricke, and has the following comments:

The subject report compiled results of the groundwater sampling conducted since March 1989, including two sampling events conducted in January and July of 1999.

During the two sampling events in 1999, a total of six monitoring wells were sampled. Maximum concentrations of 1,1-DCE (320 ug/l), PCE (180 ug/l) and TCE (570 ug/l) were detected in the groundwater (Table 2).

Depth to groundwater was measured at approximately 27 feet bgs, and flowing in a northward direction.

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# California Regional Water Quality Control Board

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Phone (213) 576-6600 FAX (213) 576-6640  
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**Gray Davis**  
Governor

### MEMORANDUM

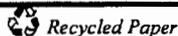
**TO:** Case File of Calmar (102.0055)  
**FROM:** Yi Lu  
**DATE:** May 31, 2000  
**SUBJECT:** Report Review

Regional Board staff has reviewed a soil gas monitoring report dated 05/23/00, submitted by Levine-Fricke, and has the following comments:

The subject report summarized results of the fourth (last) quarterly soil gas monitoring conducted in February 2000.

On February 3, 2000, a total of twelve probes to a maximum depth of 25 feet bgs were sampled. Maximum concentrations of 1,1-DCE (2 ug/l), PCE (86 ug/l) and TCE (3 ug/l) were detected in the probes (Table 1). PCE and TCE concentrations are in general lower than last time sampling in October 1999.

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**Soil-Gas Monitoring at the Calmar Facility  
333 South Turnbull Canyon Road  
City of Industry, California  
(File No. 102.055)**

**May 23, 2000  
2455.00-01**



**Winston H. Hickox**  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
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**Gray Davis**  
Governor

### MEMORANDUM

**TO:** Sunset Case File (102.0092)

**FROM:** Yi Lu  
Associate Engineering Geologist  
**San Gabriel Valley Cleanup Program**

**DATE:** February 17, 2000

**SUBJECT:** Report Review

Staff has reviewed the "*Groundwater Well Monitoring Report*" dated 02/08/99, submitted by Fero Engineering, and has the following comments:

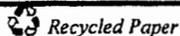
The subject report is a compliance with our letter dated November 10, 1998, in which we approved an RAP and required quarterly groundwater monitoring using the only well at the site. The purpose of the monitoring is to monitor the performance of the vapor extraction system (VES) currently operated at the site.

In January 2000, the sole monitoring well at the site was sampled. 1,1-DCA (168 ug/l), 1,1-DCE (207 ug/l), 1,2-DCE (8 ug/l), PCE (580 ug/l), and TCE (40 ug/l) were detected in the groundwater (Table 2).

Depth to groundwater was measured at approximately 27 feet bgs.

The groundwater monitoring will continue until the completion of the VES operation.

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**Soil-Gas Monitoring at the Calmar Facility  
333 South Turnbull Canyon Road  
City of Industry, California  
(File No. 102.055)**

**January 10, 2000  
2455.00-01**

 **LFR**  
LEVINE • FRICKE

January 10, 2000

2455.01-102

Yi Lu, Ph.D.  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754

CALIFORNIA REGIONAL  
WATER QUALITY CONTROL BOARD  
MONTEREY PARK, CA

2000 JAN 14 12:09

RECEIVED

Subject: Annual Data Report for 1999 Groundwater Sampling and Analysis  
at the Calmar Facility, City of Industry, California  
(RWQCB File #102.55)

Dear Dr. Lu:

Attached is the 1999 annual groundwater sampling and analysis report for Calmar's facility located at 333 South Turnbull Canyon Road in the City of Industry, California. This report covers the entire year of 1999. We anticipate the next groundwater sampling event will be completed in January 2000.

If you have any questions or comments regarding this report, please call me at (949) 955-1390.

Sincerely,



Martin E. Hamann, R.G., C.H.G.  
Senior Hydrogeologist

Attachment

cc: Jim Jacks, Calmar



# California Regional Water Quality Control Board

## Los Angeles Region



Winston H. Hickox  
Secretary for  
Environmental  
Protection

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Phone (213) 576-6600 FAX (213) 576-6640  
Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>

Gray Davis  
Governor

### MEMORANDUM

**TO:** Case File of Calmar (102.0055)

**FROM:** Yi Lu  
Associate Engineering Geologist  
San Gabriel Valley Cleanup Program

**DATE:** September 27, 1999

**SUBJECT:** Report Review

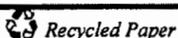
Regional Board staff has reviewed a soil gas monitoring report dated September 23, 1999, submitted by Levine-Fricke, and has the following comments:

The subject report summarized results of the second quarterly soil gas monitoring conducted in July 1999.

In July 1999, a total of twelve probes to a maximum depth of 25 feet bgs were sampled. Maximum concentrations of PCE (110 ug/l) and TCE (54 ug/l) were detected in the probes (Table 1). PCE and TCE concentrations are in general higher than last time sampling in April 1999.

Next soil gas sampling is scheduled in October 1999.

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Secretary for  
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# California Regional Water Quality Control Board

## Los Angeles Region

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Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>



**Gray Davis**  
Governor

### MEMORANDUM

**TO:** Case File of Calmar (102.0055)

**FROM:** Yi Lu  
Associate Engineering Geologist  
San Gabriel Valley Cleanup Program

**DATE:** June 21, 1999

**SUBJECT:** Report Review

Regional Board staff has reviewed a soil gas monitoring report dated June 15, 1999, submitted by Levine-Fricke, and has the following comments:

The subject report is a response to our letter dated April 6, 1999, in which we allowed the site to conduct quarterly soil gas monitoring for a one-year period prior to requiring soil cleanup. The subject report summarized results of the first quarterly soil gas monitoring conducted in April 1999.

In April 1999, a total of nine probes to a maximum depth of 25 feet bgs were sampled. Maximum concentrations of 1,1-DCE (1.4 ug/l), PCE (34 ug/l), and TCE (1.4 ug/l) were detected in the probes (Table 1).

Next soil gas sampling is scheduled in July 1999.

**California Environmental Protection Agency**



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**Soil-Gas Monitoring at the Calmar Facility  
333 South Turnbull Canyon Road  
City of Industry, California  
(File No. 102.055**

**June 15, 1999  
2455.00**





Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640  
Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>



Gray Davis  
Governor

April 6, 1999

Mr. Jim Jacks  
CALMAR, INC.  
333 South Turnbull Canyon Road  
City of Industry, CA 91745

SAN GABRIEL VALLEY CLEANUP PROGRAM - **WORKPLAN APPROVAL**, CALMAR, INC., 333 S. TURNBULL CANYON RD., CITY OF INDUSTRY, CA (FILE No. 102.0055)

Dear Mr. Jacks:

We are in receipt of a workplan dated March 23, 1999 from your consultant, LFR Levine-Fricke (LFR). The subject workplan is a response to our letter dated March 22, 1999, in which we requested that one-year monitoring of volatile organic compounds (VOCs) in the soil using selected existing probes, and monitoring of VOCs in the groundwater using selected existing monitoring wells. The vapor and groundwater monitoring data will be used to evaluate if soil cleanup is required. A review of the workplan indicated that it is in compliance with our requirements and you are authorized to implement, with the following provisions:

1. The existing probes selected for the monitoring must be tested to assure they are intact. New probes must be installed if the existing probes cannot be used.
2. Installation of new probes (if any), and sampling and analysis of vapor samples from the probes must be performed in accordance with this Regional Board's "*Interim Guidance for Active Soil Gas Investigation*" (Guidance) dated February 1997. A copy of the guidance is available upon request.
3. The subject workplan must be implemented by April 15, 1999 and two copies of each monitoring report are due to us within a month after the fieldwork. The first monitoring report is due to us by **May 15, 1999**. Regional Board staff must be notified in writing at least seven days prior to the field work.

*California Environmental Protection Agency*



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Protects water resources for the benefit of present and future generations

Mr. Jim Jacks  
Page 2

Your cooperation in completing Regional Board staff requirements is appreciated. If you have any questions, please contact me at (213) 576-6728.

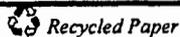
Sincerely,



Yi Lu, Ph. D., RG  
Associate Engineering Geologist

cc: Mr. Loren E. Henning, U.S. EPA, Region IX  
Mr. Lauren P. Alterman, SANTI-GOBAIN, INC.  
Mr. Martin Hamann, Levin-Fricke-Recon, (Irvine)

**California Environmental Protection Agency**



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March 23, 1999

RECEIVED MAR 24 1999

2455.00-600

Dr. Yi Lu  
California Regional Water Quality Control Board  
320 West Fourth Street, Suite 200  
Los Angeles, California 90013

Subject: Work Plan for Soil Gas Evaluation at the Calmar Facility, City of Industry, California  
File No. 102.055

Dear Dr. Lu:

At the request of Calmar, Inc., LFR Levine-Fricke (LFR) has prepared the attached work plan for soil-gas evaluation at the Calmar facility located at 333 South Turnbull Canyon Road, City of Industry, California ("the Site"). This work plan is submitted in response to Calmar's meeting with the California Regional Water Quality Control Board, Los Angeles Region (RWQCB), on February 18, 1999. At this meeting it was agreed that Calmar would conduct quarterly soil-gas monitoring at the Site for tetrachloroethene and trichloroethene. These data will be used to evaluate current soil conditions at the Site and to assist in determining whether soil remediation will be necessary. The scope of work for the work plan includes quarterly evaluation of soil-vapor concentrations in the vapor wells and soil-gas sampling points installed at Calmar.

At the meeting, the RWQCB and Calmar also agreed that semiannual groundwater monitoring at the Site will continue with a reduced number of wells being sampled. Wells MW-1, MW-4, and P-3 will no longer be sampled. However, groundwater measurements will be taken in those wells at the time the semiannual monitoring is conducted. All other wells associated with the Site will continue to be sampled and groundwater levels in them will be measured. This letter serves as confirmation of this agreement.

If you have any questions or comments about the work plan, please call Martin Hamann, R.G., C.H.G., Senior Hydrogeologist, or me at (949) 955-1390.

Sincerely,



David E. Field, R.G.  
Principal Hydrogeologist

Attachment

## CONTENTS

1.0 INTRODUCTION.....	1
2.0 SCOPE OF WORK.....	1
Task 1: Prefield Activities.....	1
Task 2: Conduct Quarterly Soil-Gas Surveys .....	1
Task 3: Report Preparation.....	2
3.0 SCHEDULE.....	2

## FIGURES

- 1 Site Vicinity
- 2 Vapor Extraction Well Locations

## 1.0 INTRODUCTION

At the request of Calmar, Inc., LFR Levine-Fricke (LFR) has prepared this work plan for soil-gas evaluation at the Calmar facility, 333 South Turnbull Canyon Road, City of Industry, California ("the Site"; Figure 1).

At a meeting between Calmar and the California Regional Water Quality Control Board, Los Angeles Region (RWQCB), on February 18, 1999, it was agreed that Calmar would conduct quarterly soil-gas monitoring at the Site for tetrachloroethene (PCE) and trichloroethene (TCE). These data will be used to evaluate current soil conditions at the Site and to assist in determining whether soil remediation will be necessary.

## 2.0 SCOPE OF WORK

LFR proposes to conduct the following specific tasks to accomplish the soil-gas evaluation of the Site:

- Task 1: Prefield Activities
- Task 2: Conduct Quarterly Soil-Gas Surveys
- Task 3: Report Preparation

Each of these tasks is discussed in detail below.

### Task 1: Prefield Activities

LFR will prepare a site-specific Health and Safety Plan (HSP) in accordance with applicable federal and state regulations (29CFR1910.120 and 8CCR5192, respectively). The HSP will be reviewed and approved by a Certified Industrial Hygienist before fieldwork begins.

### Task 2: Conduct Quarterly Soil-Gas Surveys

Quarterly soil-gas surveys of the Site will be performed to evaluate subsurface conditions in the area of chlorinated hydrocarbon-affected soil. We anticipate that soil vapor will be sampled at the following eight locations:

- NVP4 (three depths)
- VE5
- VE6S/VE6D
- VE8

- VE10
- VE12S/VE12D
- VE13
- VE14

The proposed soil-gas sampling locations are illustrated in Figure 2.

## Procedures

All procedures for the soil-gas investigation are from the RWQCB's publication entitled "Interim Guidance for Active Soil Gas Investigation," dated February 25, 1997.

InterPhase, a California certified soil-gas laboratory, will conduct the quarterly soil-gas surveys as the Site. During each sampling event, purge volumes will be determined on the first sampling point. Purge amounts of two, four, and eight well volumes will be analyzed. The purge volume with the highest detected concentration will be duplicated at the remaining sampling locations.

Purge volumes from the vapor extraction system wells will be collected by capping the well and drawing a vacuum through a coupling on the cap. Soil-gas samples will be collected by filling a glass sample syringe from an unbroken length of ¼-inch polyethylene tubing installed within the vapor well or from the tubing in the vapor probe.

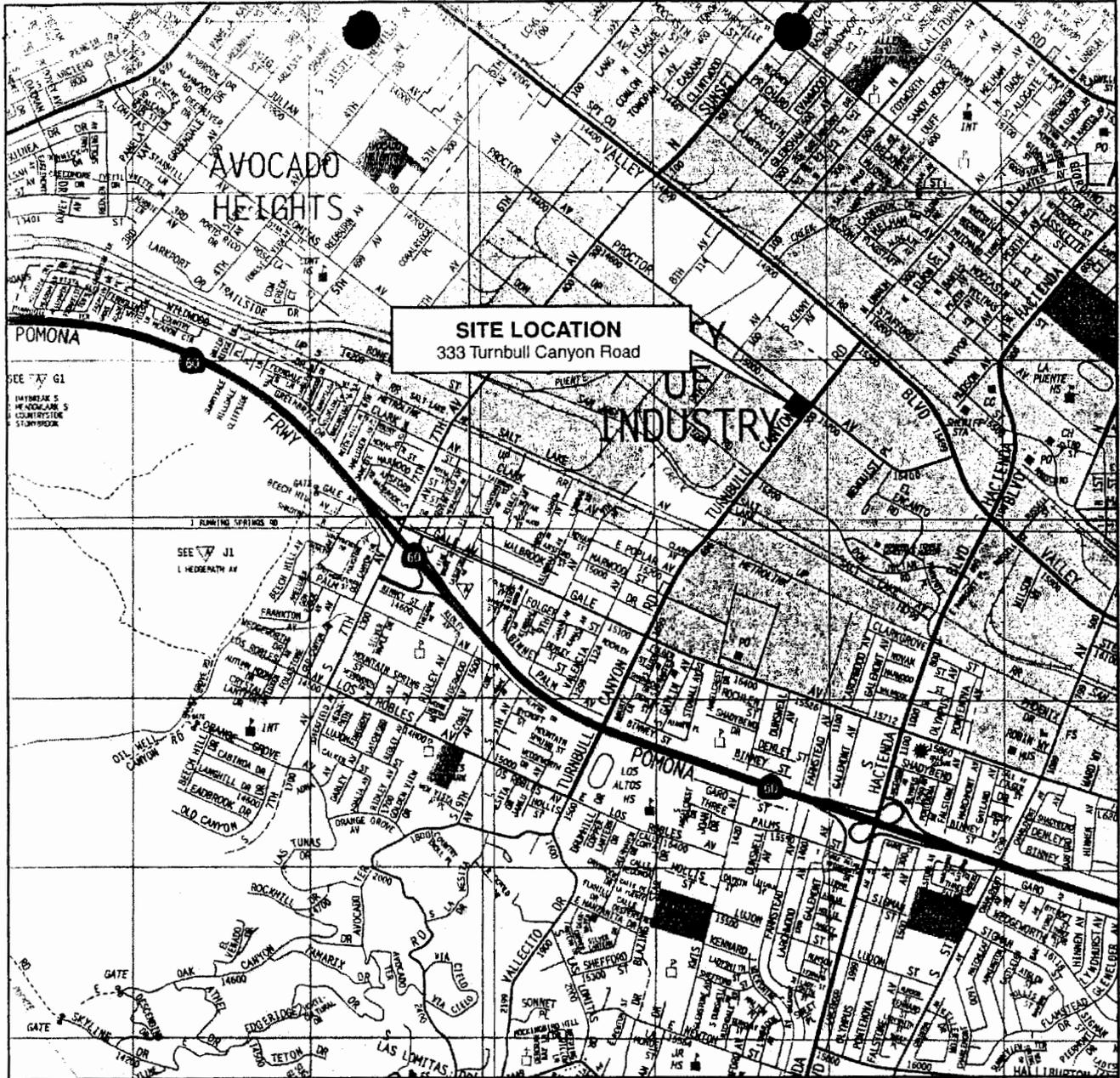
Soil-gas samples will be analyzed on site for the RWQCB's list of Primary Target Compounds using EPA Method 8021 Modified. Soil-gas samples will be analyzed in accordance with quality assurance/quality control, analytical, and reporting requirements established by the RWQCB Well Investigation Program (WIP).

## Task 3: Report Preparation

LFR will prepare a short letter report each quarter detailing the results of that quarter's soil-gas survey. At the end of the year, LFR will prepare a detailed report summarizing the results of all four surveys. The report will include sampling methodology, a discussion of analytical results, and conclusions. Copies of analytical laboratory reports will be included as an appendix to the report. LFR will submit this report to the RWQCB for review and comment.

## 3.0 SCHEDULE

Soil-vapor surveys of the Site will be performed on a quarterly basis. The first quarterly soil-vapor survey will be conducted within one month of the RWQCB's approval of this work plan. LFR will notify RWQCB staff of field work at least 72 hours in advance.



Reproduced with permission granted by Thomas Bros. Maps®  
 MAP SOURCE: Thomas Bros Guide®, Los Angeles County, California, pp.637, 638,677 & 678 , 1996.



0 1/4 1/2 1 mile



Site Vicinity

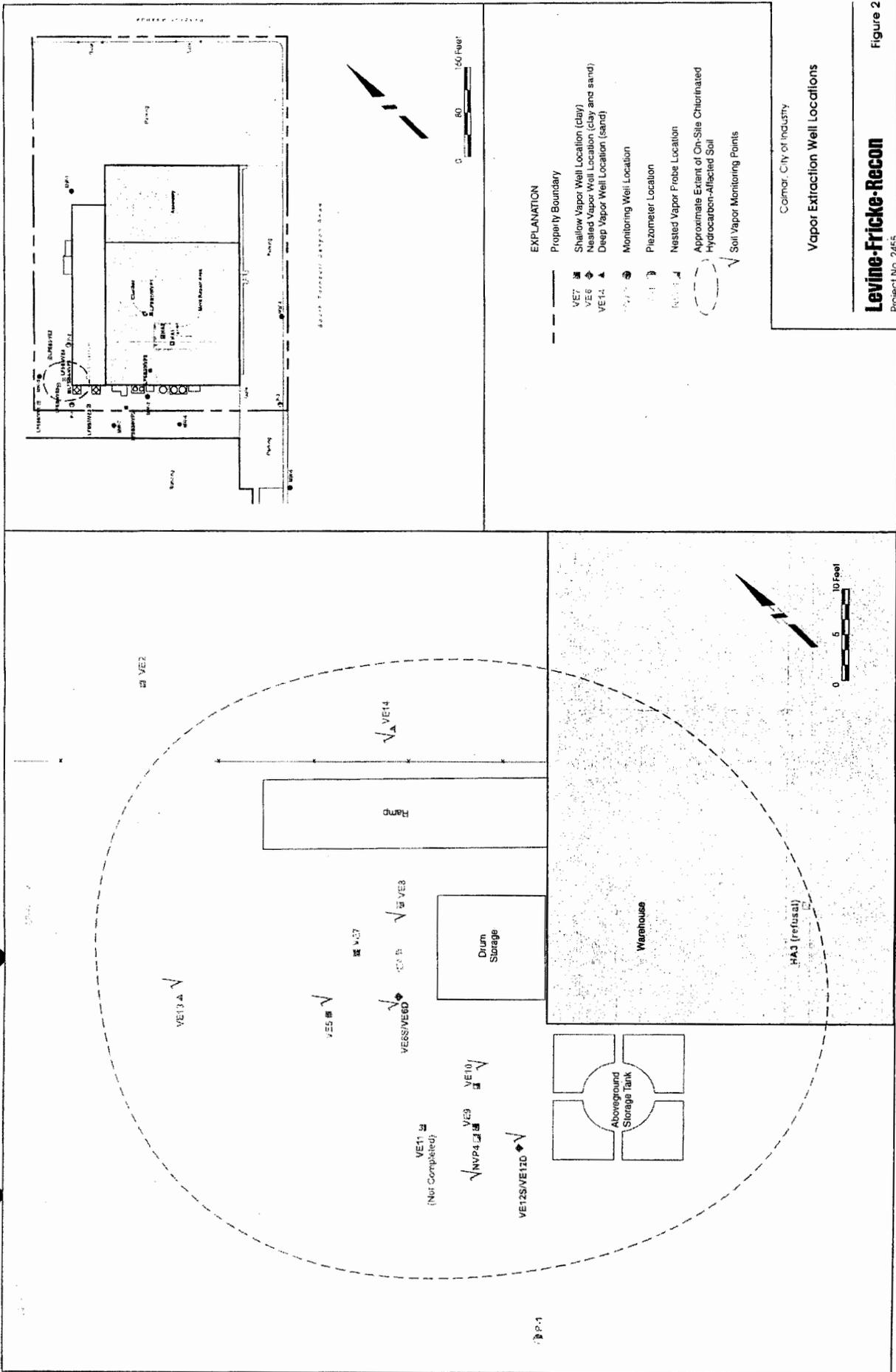
Calmar

**Levine-Fricke-Recon**

**Figure 1**

Project No. 2455

2455-70 - 112196MEH/scj



**EXPLANATION**

---	Property Boundary
VE7	Shallow Vapor Well Location (clay)
VE6	Nested Vapor Well Location (clay and sand)
VE14	Deep Vapor Well Location (sand)
○	Monitoring Well Location
□	Piezometer Location
○	Nested Vapor Probe Location
○	Approximate Extent of On-Site Chlorinated Hydrocarbon-Affected Soil
▽	Soil Vapor Monitoring Points

Comair, City of Industry  
**Vapor Extraction Well Locations**

**Levine-Fricke-Recon**  
 Project No. 2465

Figure 2



Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

320 West 4th Street, Suite 200, Los Angeles, CA 90013  
Phone (213) 576-6600 • FAX (213) 576-6640  
Internet Address <http://www.swrcb.ca.gov/~rwqcb4>



Gary Davi  
Governor

March 22, 1999

Mr. Jim Jacks  
CALMAR, INC.  
333 South Turnbull Canyon Road  
City of Industry, CA 91745

SAN GABRIEL VALLEY CLEANUP PROGRAM - WORKPLAN, CALMAR, INC., 333 S. TURNBULL CANYON RD., CITY OF INDUSTRY, CA (FILE No. 102.0055)

Dear Mr. Jacks:

During our February 18, 1999 meeting, the following issues were discussed and/or agreed upon:

1. Regional Board staff indicated to you that pursuant to recent changes of the California Health and Safety Code Chapter 6.75 (Section 25299.37.2) and Division 7 of the California Water Code under AB 681, the Regional Board is required to notify all current fee title holders for the subject site or sites impacted by releases from potential contaminant source(s) prior to considering corrective action and cleanup or case closure. Since you are identified as the current primary or active responsible part for corrective action and/or cleanup at the subject site, we are requesting that you provide us with a complete mailing list of all record fee title holders of the subject site, together with a copy of county record of current ownership (grant trust deed), available from the County Recorder's office, for verification.
2. We all agree that a vapor and groundwater monitoring program will be implemented to monitor volatile organic compounds (VOCs) concentrations in the soil and ground water prior to requiring vadose zone cleanup. The monitoring data will be used to verify VOCs concentrations detected in the previous site assessments and to serve as the baseline concentrations should vadose zone cleanup is warranted. A workplan with details of the monitoring program must be submitted to the Regional Board for review and approval.
3. Regional Board staff emphasized that such monitoring is not a cleanup because no contaminant masses were removed from the vadose zone. Soil cleanup may still be required if the subject monitoring data warrant so and/or if the regulatory agencies, such as the Regional Board and/or the United States Environmental Protection Agency, decides it is necessary.



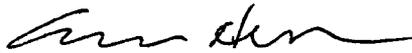
*Our mission is to preserve and enhance the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.*

Mr. Jim Jacks  
Page 2

Please submit the above-mentioned title document and workplan by **April 12, 1999**. Regional Board staff are prepared to meet with you and/or your consultant to develop a cost-effective workplan that will address our concern while minimizing the impacts to your business.

If you have any questions, please contact Mr. Yi Lu at (213) 576-6728.

Sincerely,



ARTHUR G. HEATH, Ph. D.  
Unit Chief

cc: Mr. Loren E. Henning, U.S. EPA, Region IX  
Ms. Alanna J. Regan, Latham & Watkins  
Mr. Martin Hamann, Levin-Fricke-Recon



March 2, 199

Dear DR. YI LU,

HERE IS A COPY THE GRANT DEED FOR THE CALMAR PROPERTY.

Sincerely,

A handwritten signature in cursive script that reads 'J Jacks'.

JIM JACKS  
MAINT. MGR.

---



SAFECO TITLE  
INSURANCE COMPANY

GRANT DEED



SAFECO TITLE  
INSURANCE COMPANY

HOME OFFICE  
13640 ROSCOE BOULEVARD  
PANORAMA CITY, CALIFORNIA 91409

GRANT DEED



SAFECO TITLE  
INSURANCE COMPANY

HOME OFFICE  
13640 ROSCOE BOULEVARD  
PANORAMA CITY, CALIFORNIA 91409

SAFECO TITLE  
INSURANCE COMPANY

## OFFICE MEMO

TO: File	DATE: 02/09/99
	SUBJECT: Calmar (102.0055)
FROM: Yi Lu	

Staff have reviewed the "*Annual Data Report for 1998, Groundwater sampling and Analysis at the Calmar Facility*" dated 02/03/99 submitted by Levine-Fricke-Recon (LFR), and have the following comments:

1. The subject report contains results of groundwater monitoring performed in February and July 1998, respectively.
2. A total of seven monitoring wells and three piezometers were gauged and sampled. Groundwater was measured at approximately 27 feet bgs, flowing generally in a northwesterly direction.
3. During these two sampling events, maximum concentrations of 1,1-DCA (13 ug/l), 1,1-DCE (210 ug/l), PCE (118 ug/l), and TCE (580 ug/l) were detected in the ground water. Higher VOC concentrations were detected near the potential hotspot of the soil contamination.

February 3, 1999

2455.01-102

Yi Lu, Ph.D.  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754

Subject: Annual Data Report for 1998 Groundwater Sampling and Analysis at the Calmar Facility, City of Industry, California (RWQCB File #102.55)

Dear Dr. Lu:

Attached is the 1998 annual groundwater sampling and analysis report for Calmar's facility located at 333 South Turnbull Canyon Road in the City of Industry, California. This report covers the entire year of 1998. We anticipate the next groundwater sampling event to be completed in January 1999. If you have any questions or comments regarding this report, please call me at (949) 955-1390.

Sincerely,



Martin E. Hamann, R.G., C.H.G.  
Senior Hydrogeologist

Attachment

cc: Jim Jacks, Calmar

LETTER OF TRANSMITTAL  
2455.01.206

January 22, 1999

Dr. Yi Lu  
California Regional Water Quality Control Board  
101 Centre Plaza  
Monterey Park, CA

Re: EPA Guidelines for RNA

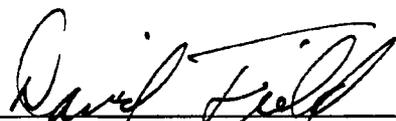
The following items are enclosed via U.S. Mail

Description	No. of Copies
EPA Guidelines for Remediation by Attenuation, November, 1996	1

- The item(s) are transmitted:
- At your request
  - For your review/comment
  - For your approval
  - For your action
  - For your files
  - For your information

Comments:

Sincerely,



David Field, R.G., Principal Geologist

## OFFICE MEMO

TO: File	DATE: 01/07/99
	SUBJECT: Calmar (102.0055)
FROM: Yi Lu	

Staff have reviewed a groundwater monitoring report dated 12/03/97 submitted by Levine-Fricke-Recon (LFR), and have the following comments:

1. The subject groundwater monitoring was performed in July 1997. A total of seven monitoring wells and three piezometers were gauged and sampled. Groundwater was measured at approximately 27 feet bgs, flowing generally in a northwesterly direction.
2. During this sampling event, maximum concentrations of 1,1-DCA (12 ug/l), 1,1-DCE (120 ug/l), PCE (110 ug/l), and TCE (370 ug/l) were detected in the ground water. Higher VOC concentrations were detected near the potential hotspot of the soil contamination.

98 OCT 23 PM 3:17

CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

**Results of Second Vapor Extraction Pilot Test  
at Calmar, Inc.  
333 South Turnbull Canyon Road  
City of Industry, California**

**October 23, 1998  
LFR 2455-01-400**

Prepared for  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754



**Peter M. Rooney**  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

Internet Address: <http://www.swrcb.ca.gov>  
101 Centre Plaza Drive, Monterey Park, California 91754-2156  
Phone (323) 266-7500 • FAX (323) 266-7600



**Pete Wilson**  
Governor

September 24, 1998

Mr. Jim Jacks  
CALMAR, INC.  
333 South Turnbull Canyon Road  
City of Industry, CA 91745

**SAN GABRIEL VALLEY CLEANUP PROGRAM - VAPOR EXTRACTION SYSTEM (VES) PILOT TEST DATA, CALMAR, INC., 333 S. TURNBULL CYN RD., CITY OF INDUSTRY, CA (FILE No. 102.0055)**

Dear Mr. Jacks:

This letter is a follow-up to the telephone conference on September 11, 1998.

On September 21, 1998, Regional Board staff contacted Mr. Hamann of Levin-Fricke-Recon, who stated that additional pilot tests were performed recently on the VES and results of the test will be submitted to us when other concerned parties complete their review.

To ensure a prompt review and response, please submit two copies of the report summarizing the pilot test results to this Regional Board by **October 23, 1998**. If you have any questions, please contact me at (323)266-7642.

Sincerely,

Yi Lu, Ph. D., RG  
Associate Engineering Geologist

cc: Mr. Loren E. Henning, U.S. EPA, Region IX  
Ms. Alanna J. Regan, Latham & Watkins  
Mr. Martin Hamann, Levin-Fricke-Recon



June 17, 1998

2455.01-400

Mr. Julio C. Lara  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza  
Monterey Park, California 91754

Subject: Additional Vapor Extraction Pilot Testing, Calmar Inc., 333 South Turnbull Canyon Road, City of Industry, California  
(RWQCB File No. 102.0055)

Dear Mr. Lara:

Based on our review of initial pilot test data and your recent input regarding additional vapor extraction pilot testing, Levine-Fricke-Recon (LFR) has prepared this letter to outline our proposed scope of work for additional vapor extraction pilot testing of the lithologic sand unit and retesting of the shallow clay unit at the above-referenced site.

### **Scope of Work**

Our proposed scope of work includes the following tasks:

- Install vapor wells in the shallow clay unit and deeper sand unit.
- Perform a vapor extraction pilot test on each respective lithologic unit.
- Prepare a letter report for submission to the Los Angeles Regional Water Quality Control Board (RWQCB).

These tasks are described in detail in the following sections.

### ***Install Vapor Wells***

The primary objective of installing supplemental vapor wells at the site is to provide appropriately located data collection points. Secondary objectives include reducing future drilling expenditures, and more precisely identifying the extent of soils requiring remediation.

Existing wells in the proposed pilot test vicinity were not originally constructed for use in evaluating vapor extraction of the deeper lithologic sand unit. Supplemental vapor wells will therefore be installed in the deeper sand unit to provide appropriate data collection points. These

wells will be nested in configuration with an additional screened casing discretely installed in the shallow clay unit. The casings installed in the shallow clay unit will be utilized to further evaluate achievable radial influence in this formation.

Consistent with the methodology of the initial pilot testing, a vacuum will be applied to a well casing screened within the lithologic formation of interest, and responses to this vacuum will be measured in surrounding wells. The installation of additional wells within the shallow clay unit will provide the opportunity to monitor radial influence at radial distances less than 10 feet. The closest well spacing in the initial pilot test was 10 feet.

LFR will reduce future drilling expenditures by maximizing the efficiency of a one-day drilling rig mobilization. The drilling subcontractor will install as many vapor wells as is possible and appropriate within a one-day period. As previously discussed, the wells will be installed in a nested vapor well configuration that will be discretely screened within both the deeper sand unit and the near-surface clay unit. Actual well construction will be determined by a LFR geologist based on present depth to groundwater and lithologic conditions identified in the field. Soil samples will be collected from the well borings and analyzed for the purpose of more precisely identifying the extent of soils requiring remediation. Wells will be located with forethought to the future construction of a vapor extraction system.

#### ***Perform a Vapor Extraction Pilot Test***

LFR will perform a vapor extraction pilot test to collect achievable radial influence and mass recovery rate data. These data will be used to evaluate the necessity of installing additional vapor wells and to select appropriate vapor extraction equipment. Historical soil-vapor analytical data are available for the sand unit; however, these data were not collected under purging conditions typical of a vapor extraction remedial process. One vapor sample will therefore be collected from the sand unit during pilot testing. The sample will be collected and preserved in a summa canister. Laboratory analysis of the vapor sample will be performed within 24 hours of sample collection. The analytical results will be used to select appropriate vapor treatment equipment.

#### ***Prepare a Letter Report for Submission to the RWQCB***

LFR will evaluate the collected data and prepare a letter report for the RWQCB. This letter report will present the procedures, results, and conclusions of the vapor extraction pilot test at the site.

#### **Schedule**

For the purpose of expediting the pilot testing process, LFR will perform the above scope of work during the week of June 29, 1998. LFR will notify your office at least 72 hours in advance of conducting field work.

We hope the proposed scope of work is satisfactory, and would appreciate receiving any comments you may have. Please do not hesitate to contact either of the undersigned at (949) 955-1390.

Sincerely,



Steve Winners  
Senior Staff Engineer



Martin E. Hamann, R.G., C.H.G.  
Senior Hydrogeologist

LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD  
SOURCE INVESTIGATION PROGRAM

INVESTIGATION HISTORY

FACILITY :CALMAR, INC.  
FILE NUMBER :102.0055

STAFF:JCL

ACTION DESCRIPTION	DATE REQUIRED	DATE DUE	ORIGINAL DUE DATE	NUMBER OF EXTENTIONS	DATE RECEIVED	NEXT ACTION
SW1 FIRST SOIL INVESTIGATION WORKPLAN	06/18/87	09/10/87	__/__/__	1	02/14/88	__
SR1 FIRST SOIL INVESTIGATION RESULTS	05/12/88	06/10/88	__/__/__	2	10/28/88	__
GR1 FIRST GROUNDWATER INVESTIGATION RESULTS	01/01/89	03/14/89	__/__/__	1	06/13/89	__
GW1 FIRST GROUNDWATER INVESTIGATION WORKPLAN	02/21/89	03/14/89	__/__/__	1	01/01/89	__
VR2 SECOND SOIL GAS SURVEY RESULTS	12/16/93	12/31/94	__/__/__	0	01/03/95	ADR
SR1 FIRST SOIL INVESTIGATION RESULTS	12/16/93	12/31/94	__/__/__		01/03/95	ADR
GR2 SECOND GROUNDWATER INVESTIGATION RESULTS	12/16/93	12/31/94	__/__/__	0	01/03/95	ADR
GR3 THIRD GROUNDWATER INVESTIGATION RESULTS	12/16/93	04/30/95	__/__/__		04/25/95	ADR
RW1 REMEDIAL WORKPLAN 1	06/21/95	07/31/95	__/__/__		08/28/95	BPW
RW1 REMEDIAL WORKPLAN 1	01/08/97	02/10/97	__/__/__	0	06/13/97	BCA
SR2 SECOND SOIL INVESTIGATION RESULTS	03/10/97	05/10/97	__/__/__	0	06/13/97	BCA
M07 MONITORING EVENT IN JULY	06/19/97	08/31/97	__/__/__		__/__/__	CPS

102.0055 G97-0828 JZL



December 3, 1997

2455.01-400

Mr. Julio Lara  
Calmar, Inc.  
333 Turnbull Canyon Road  
City of Industry, California 91745

Subject: Results of Vapor Extraction Pilot Test Performed at Calmar, Inc., 333 South Turnbull Canyon Road, City of Industry, California

Dear Mr. Lara:

This letter presents the procedures, results, and conclusions of the vapor extraction pilot test performed by Levine-Fricke-Recon Inc. (LFR) on August 21, 1997, at the Calmar facility located at 333 South Turnbull Canyon Road in the City of Industry, California.

On August 19, 1997, an LFR geologist supervised the installation of a vapor extraction well (VE5) approximately 10 feet west of existing vapor extraction well VE4. A log of the well is attached. This well was installed to monitor the radial influence of a vacuum to be applied to well VE4 during pilot testing. Soil auger returns from the construction of VE5 confirmed the presence of soils of high clay content in the top 10 feet of the pilot test vicinity.

On August 21, 1997, an LFR engineer supervised the performance of a vapor extraction pilot test in the vicinity of soils containing elevated concentrations of chlorinated petroleum hydrocarbons. Four levels of vacuum were applied to vapor extraction well VE4, and responses to this vacuum were measured at wells VE1, VE2, VE3, and VE5 and soil probe cluster NVP4.

NVP4 is the location of six nested vapor probes of various depths. Nested vapor probe NVP4-1 was installed within the clay layer that has been identified from ground surface to 5 to 10 feet below ground surface (bgs) in the pilot test vicinity. Nested vapor probe NVP4-2 was installed within a silty sand formation at 10 to 12 feet bgs. Nested vapor probes NVP4-3 and NVP4-4 reside within a well-graded sandy formation at depths of 12 to 31 feet bgs. Nested vapor probes NVP4-5 and NVP4-6 are believed to be presently below the groundwater surface. The locations and depths of these vapor probes provided valuable information during pilot testing. This information is discussed below.

In addition to the full test conducted using VE4, LFR also applied vacuums to VE1, VE2, VE3, and VE5 to observe vacuum responses. Results were similar to those observed using VE4, and consequently full-scale vapor extraction tests at these locations were not completed.

### **Achievable Radial Influence**

Table 1 (attached) presents a summary of data obtained during pilot testing. The following radial influence observations were made during pilot testing:

- Measured vacuum responses in the clay layer were 0.009 to 0.2 percent of the applied vacuum, whereas successful applications of vapor extraction typically have at least 5 percent of the applied vacuum at the radius of influence.
- Measured vacuum responses ranged from 0.01 to 0.04 inch of water. Magnahelic gauges utilized during the test are only accurate to 0.01 inch of water. The magnitude of measured vacuum response approached the lower limits of the test instrumentation.
- The highest applied vacuum was 600 percent of the lowest applied vacuum, but the highest measured vacuum response was 100 percent of the lowest measured vacuum response. Therefore, measured vacuum responses did not significantly increase with an increase in applied vacuum.
- The higher vacuum responses measured in nested vapor probes NVP4-2, NVP4-3, and NVP4-4, screened in the sandy formation, indicate preferential pathways are likely allowing vapor to flow from the sandy formation to well VE4. A portion of this flow may also be originating from the surface around the well head.

Measured vacuum responses indicate that the radial influence in the chemically affected clay layer is relatively small. This would significantly increase the number of vapor extraction wells required for a remedial implementation based on vapor extraction. The cost of this effort could exceed that of approaches such as excavation, or more practical risk-based arguments for capping or continued monitoring.

### **Achievable Vapor Flow Rates**

Table 1 presents soil permeability calculations made from pilot test data. Soil permeabilities calculated from measured flow rates provided levels of 1.0 to 2.1 Darcys. These levels are more characteristic of the silty to clean sands identified from 10 to 31 feet bgs. This information supports the supposition made above that preferential pathways are likely allowing vapor to flow from the sandy formation to well VE4. The lack of significant vapor flow through the volatile organic compound-affected clay layer would significantly prolong or possibly render almost completely ineffective a vapor extraction remedial effort.

### **Achievable Mass Removal Rates**

Soil-vapor samples were collected from well VE4 in summa canisters at three points during the test. These samples were analyzed by Apollo Analytics of Costa Mesa, California, for volatile organics by GC/MS using EPA Method TO-14 (attached). No halogenated volatile organic compounds were detected above their respective practical quantitation limits (PQL) in the three soil-vapor samples

analyzed. We can therefore conclude that significant chemical mass does not exist in the silty and sandy soils where the vapor appears to have originated, and that significant chemical mass removal could not be achieved from the clay layer using extraction well VE4. Since well VE4 is positioned within the area of the soil plume where tetrachloroethylene and trichloroethylene have been detected in soil at concentrations above the Regional Water Quality Control Board, Los Angeles Region's screening criteria, we can conclude that vapor extraction of these compounds is not an efficient remedial method.

### Conclusions

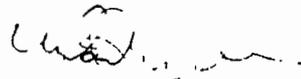
The relatively small radius of influence and the lack of significant flow through the chemically affected clay layer lead us to conclude that the vapor extraction of halogenated volatile organic compounds within the clay layer is not an effective remedial method. The cost of such an effort may exceed approaches such as excavation, or more practical risk-based arguments for no action.

If you have any further questions, please do not hesitate to contact either of the undersigned at (714) 955-1390.

Sincerely,



Steve H. Winners  
Senior Staff Engineer



Martin E. Hamann, R.G., C.H.G.  
Senior Hydrogeologist

### Attachments

cc: Jim Jacks, Calmar

Table 1:  
**Vapor Extraction Pilot Test Data**  
*Calmar, City of Industry*  
 LFR 2455.01-400

**EXTRACTION WELL MONITORING**

Time (0000)	EXTRACTION WELL VEW4		VELOCITY/TEMPERATURE METER		FID Concentration (ppmv)	SOIL VAPOR PERMEABILITY (SSRFS in Darcys)
	Pressure Applied (inches water)		Flow Rate (acfm)	Temperature (°F)		
1025	-18		3.1	79.7	0.2	2.1
1140	-40		5.7	92.1	2.8	1.7
1400	-80		10.0	95.4	2.2	1.4
1300	-115		11.4	94.3	24.9	1.0

**OBSERVATION POINT MONITORING**

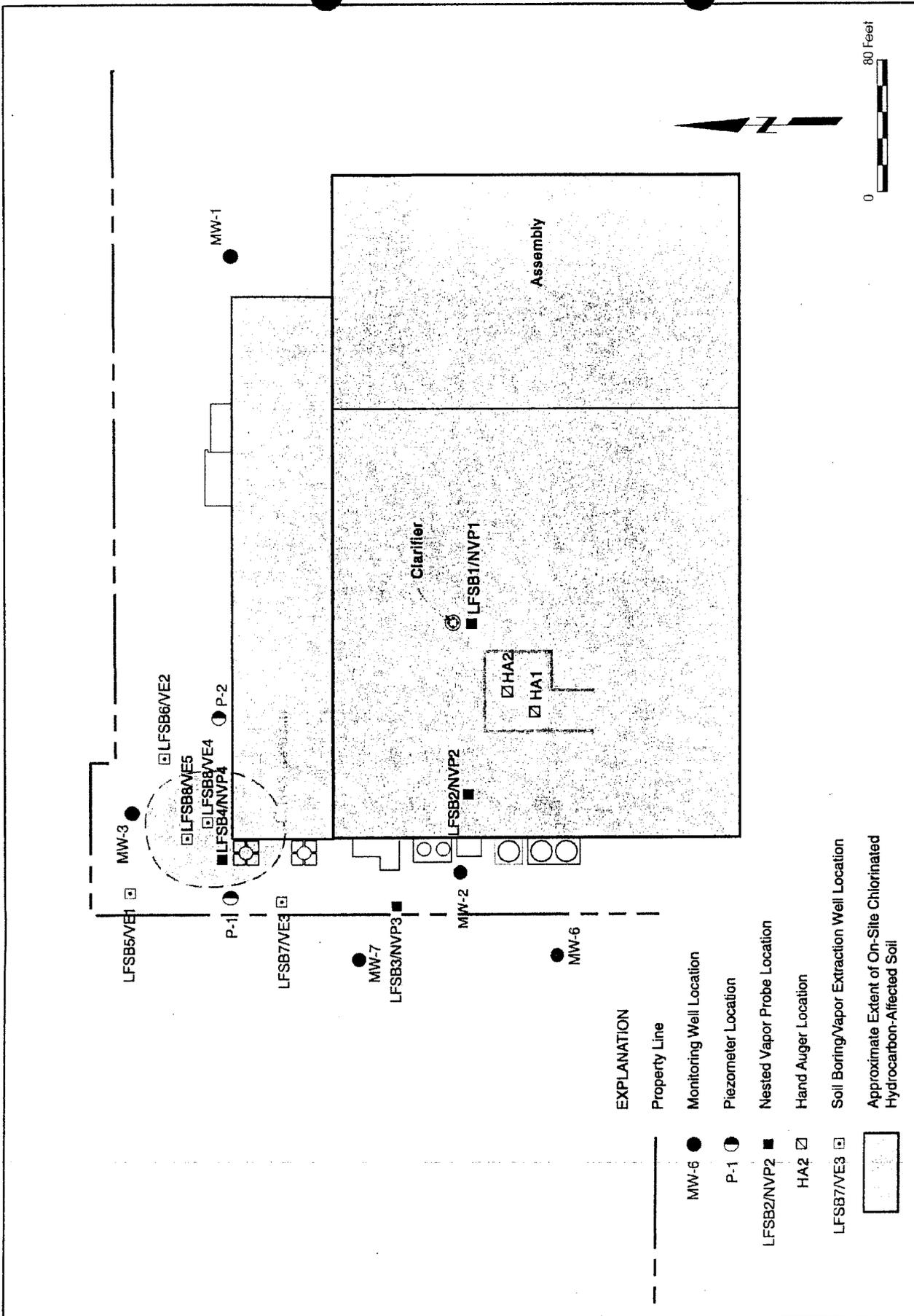
Time (0000)	OBSERVATION POINT:	VE5				23 feet				43 feet			52 feet			63 feet		
		NVP4-1	NVP4-2	NVP4-3	NVP4-4	NVP4-1	NVP4-2	NVP4-3	NVP4-4	VE1	VE2	VE3	VE1	VE2	VE3	VE1	VE2	VE3
1025	Measured	-0.02	-0.02	-0.06	-0.1	-0.02	-0.06	-0.1	-0.08	0.00	0.00	0.00	-0.04	-0.04	0.00	-0.04	-0.04	0.00
1140	Pressure	-0.04	-0.02	-0.06	-0.09	-0.04	-0.06	-0.09	-0.07	-0.03	-0.03	-0.03	-0.04	-0.04	0.00	-0.04	-0.04	0.00
1400	Response: (inches water)	-0.02	-0.02	-0.03	-0.08	-0.02	-0.03	-0.08	-0.06	-0.04	-0.04	-0.04	-0.04	-0.04	0.00	-0.04	-0.04	0.00
1300		-0.04	-0.02	-0.04	-0.1	-0.02	-0.04	-0.1	-0.07	-0.04	-0.04	-0.04	-0.04	-0.04	0.00	-0.04	-0.04	0.00

**ADDITIONAL INFORMATION**

WELL INFORMATION		ASSUMPTIONS	
Extraction Well Boring Radius (in.) =	4	Vapor Viscosity (centipoise) =	0.018
Extraction Well Screened Interval (ft.) =	5	Std. Atmospheric Pressure (inches water) =	406.9548
Monitoring Well Radial Distance (ft.) =	10.5		

SSRFS = Steady-State Radial Flow Solution for Compressible Flow (Johnson et al 1990, Spring GWMF)  
 FID = Flame Ionization Detector

QA/QC SJO



**EXPLANATION**

- Property Line
- MW-6 ● Monitoring Well Location
- P-1 ○ Piezometer Location
- LFSB2/NVP2 ■ Nested Vapor Probe Location
- HA2 □ Hand Auger Location
- LFSB7/VE3 □ Soil Boring/Vapor Extraction Well Location
- Approximate Extent of On-Site Chlorinated Hydrocarbon-Affected Soil

Vapor Extraction Pilot Test Vicinity

FILE: 2455, 02



PHONE (714) 751-3210 FAX (714) 751-6414

2960 AIRWAY AVENUE, SUITE B-101 COSTA MESA, CALIFORNIA 92626

AAI RFS #: 9723401

September 5, 1997

Levine Fricke  
1920 Main Street, Suite 750  
Irvine, CA 92714

Project Name: Calmar  
Project Number: ---

Attention: Harry Cho

Apollo Analytics Inc., has received the following sample(s):

<u>Date Received</u>	<u>Quantity</u>	<u>Matrix</u>
August 21, 1997	3	Air

The sample(s) received were analyzed for volatile organics by GC/MS using EPA method TO-14.

The results of these analyses and the quality control are enclosed. If you have any questions please do not hesitate to call (714) 751-3210.

Leon Levan  
Laboratory Manager

## VOLATILE ORGANIC ANALYSIS

**CLIENT NAME:** Levine Fricke  
**PROJECT #:** —  
**PROJECT NAME:** Calmar  
**MATRIX:** Air/Tedlar  
**SAMPLE VOLUME:** 0.02 Liter  
**INITIAL PRESSURE:** 1.00 psia  
**FINAL PRESSURE:** 1.00 psia  
**PRES. DILUTION :** 1.00  
**DILUTION FACTOR:** 1

**CLIENT SAMPLE ID:** Method Blank  
**AAI RFS#** 9723401  
**AAI ID#:** Method Blank

**DATE SAMPLED:** 8/21/97  
**DATE RECEIVED:** 8/21/97  
**DATE ANALYZED:** 8/28/97

**ANALYTICAL METHOD:** EPA TO14 (GC/MS)

CAS NUMBER	COMPOUND	CONCENTRATION			
		mg/m3	PQL	ppm(v)	PQL
74-87-3	Chloromethane	ND<	0.5	ND<	0.2
74-83-9	Bromomethane	ND<	0.5	ND<	0.1
75-01-04	Vinyl Chloride	ND<	0.5	ND<	0.2
75-00-3	Chloroethane	ND<	0.5	ND<	0.2
75-69-4	Freon 11	ND<	0.5	ND<	0.1
75-35-4	1,1-Dichloroethene	ND<	0.5	ND<	0.1
76-13-1	Freon 113	ND<	0.5	ND<	0.1
75-09-2	Methylene Chloride	ND<	0.5	ND<	0.1
75-35-3	1,1-Dichloroethane	ND<	0.5	ND<	0.1
156-60-5	trans-1,2-Dichloroethene	ND<	0.5	ND<	0.1
156-59-2	cis-1,2-Dichloroethene	ND<	0.5	ND<	0.1
67-66-3	Chloroform	ND<	0.5	ND<	0.1
71-55-6	1,1,1-Trichloroethane	ND<	0.5	ND<	0.1
56-23-5	Carbon Tetrachloride	ND<	0.5	ND<	0.1
71-43-2	Benzene	ND<	0.5	ND<	0.2
107-06-2	1,2-Dichloroethane	ND<	0.5	ND<	0.1
79-01-6	Trichloroethene	ND<	0.5	ND<	0.1
78-87-5	1,2-Dichloropropane	ND<	0.5	ND<	0.1
10061-02-6	trans-1,3-Dichloropropene	ND<	0.5	ND<	0.1
108-88-3	Toluene	ND<	0.5	ND<	0.1
10061-01-5	cis-1,3-Dichloropropene	ND<	0.5	ND<	0.1
79-00-5	1,1,2-Trichloroethane	ND<	0.5	ND<	0.1
127-18-4	Tetrachloroethene	ND<	0.5	ND<	0.1
106-93-4	Ethylene Dibromide	ND<	0.5	ND<	0.1
108-90-7	Chlorobenzene	ND<	0.5	ND<	0.1
100-41-4	Ethylbenzene	ND<	0.5	ND<	0.1
1330-20-7	m,p-Xylene	ND<	0.5	ND<	0.1
95-47-6	o-Xylene	ND<	0.5	ND<	0.1
100-42-5	Styrene	ND<	0.5	ND<	0.1
79-34-5	1,1,2,2-Tetrachloroethane	ND<	0.5	ND<	0.1
108-67-8	1,3,5-Trimethyl Benzene	ND<	0.5	ND<	0.1
95-63-6	1,2,4-Trimethyl Benzene	ND<	0.5	ND<	0.1
541-73-1	1,3-Dichlorobenzene	ND<	0.5	ND<	0.1
106-46-7	1,4-Dichlorobenzene	ND<	0.5	ND<	0.1
100-44-7	Chlorotoluene	ND<	0.5	ND<	0.1
95-50-1	1,2-Dichlorobenzene	ND<	0.5	ND<	0.1
67-64-1	Acetone	ND<	0.5	ND<	0.2
78-93-3	2-Butanone	ND<	0.5	ND<	0.2
108-10-1	4-methyl-2-pentanone	ND<	0.5	ND<	0.1
591-78-6	2-Hexanone	ND<	0.5	ND<	0.1
<b>Surrogate Recovery</b>		<b>% Recovery</b>			
1,2-Dichloroethane-D4 (SS1)		81	70-130		
Toluene-d8 (SS2)		101	70-130		
4- Bromofluorobenzene (SS3)		117	70-130		

ND- Not detected

\*Value outside QC limits due to matrix interference.

TR - Trace

## VOLATILE ORGANIC ANALYSIS

**CLIENT NAME:** Levine Fricke  
**PROJECT #:** ---  
**PROJECT NAME:** Calmar  
**MATRIX:** Air  
**SAMPLE VOLUME:** 0.02 Liter  
**INITIAL PRESSURE:** 13.90 psia  
**FINAL PRESSURE:** 19.40 psia  
**PRES. DILUTION :** 1.40  
**DILUTION FACTOR:** 1

**CLIENT SAMPLE ID:** CAS-1  
**AAI RFS#** 9723401  
**AAI ID#:** 9723401-001

**DATE SAMPLED:** 8/21/97  
**DATE RECEIVED:** 8/21/97  
**DATE ANALYZED:** 8/28/97

**ANALYTICAL METHOD:** EPA TO14 (GC/MS)

CAS NUMBER	COMPOUND	CONCENTRATION			
		mg/m3	PQL	ppm(v)	PQL
74-87-3	Chloromethane	ND<	0.7	ND<	0.3
74-83-9	Bromomethane	ND<	0.7	ND<	0.2
75-01-04	Vinyl Chloride	ND<	0.7	ND<	0.3
75-00-3	Chloroethane	ND<	0.7	ND<	0.3
75-69-4	Freon 11	ND<	0.7	ND<	0.1
75-35-4	1,1-Dichloroethene	ND<	0.7	ND<	0.2
76-13-1	Freon 113	ND<	0.7	ND<	0.1
75-09-2	Methylene Chloride	ND<	0.7	ND<	0.2
75-35-3	1,1-Dichloroethane	ND<	0.7	ND<	0.2
156-60-5	trans-1,2-Dichloroethene	ND<	0.7	ND<	0.2
156-59-2	cis-1,2-Dichloroethene	ND<	0.7	ND<	0.2
67-66-3	Chloroform	ND<	0.7	ND<	0.1
71-55-6	1,1,1-Trichloroethane	ND<	0.7	ND<	0.1
56-23-5	Carbon Tetrachloride	ND<	0.7	ND<	0.1
71-43-2	Benzene	ND<	0.7	ND<	0.2
107-06-2	1,2-Dichloroethane	ND<	0.7	ND<	0.2
79-01-6	Trichloroethene	ND<	0.7	ND<	0.1
78-87-5	1,2-Dichloropropane	ND<	0.7	ND<	0.2
10061-02-6	trans-1,3-Dichloropropene	ND<	0.7	ND<	0.2
108-88-3	Toluene	ND<	0.7	ND<	0.2
10061-01-5	cis-1,3-Dichloropropene	ND<	0.7	ND<	0.2
79-00-5	1,1-2-Trichloroethane	ND<	0.7	ND<	0.1
127-18-4	Tetrachloroethene	ND<	0.7	ND<	0.1
106-93-4	Ethylene Dibromide	ND<	0.7	ND<	0.1
108-90-7	Chlorobenzene	ND<	0.7	ND<	0.2
100-41-4	Ethylbenzene	ND<	0.7	ND<	0.2
1330-20-7	m,p-Xylene	ND<	0.7	ND<	0.2
95-47-6	o-Xylene	ND<	0.7	ND<	0.2
100-42-5	Styrene	ND<	0.7	ND<	0.2
79-34-5	1,1,2,2-Tetrachloroethane	ND<	0.7	ND<	0.1
108-67-8	1,3,5-Trimethyl Benzene	ND<	0.7	ND<	0.1
95-63-6	1,2,4-Trimethyl Benzene	ND<	0.7	ND<	0.1
541-73-1	1,3-Dichlorobenzene	ND<	0.7	ND<	0.1
106-46-7	1,4-Dichlorobenzene	ND<	0.7	ND<	0.1
100-44-7	Chlorotoluene	ND<	0.7	ND<	0.1
95-50-1	1,2-Dichlorobenzene	ND<	0.7	ND<	0.1
67-64-1	Acetone	1.6		0.7	
78-93-3	2-Butanone	ND<	0.7	ND<	0.2
108-10-1	4-methyl-2-pentanone	ND<	0.7	ND<	0.2
591-78-6	2-Hexanone	ND<	0.7	ND<	0.2

Surrogate Recovery	% Recovery	
1,2-Dichloroethane-D4 (SS1)	74	70-130
Toluene-d8 (SS2)	107	70-130
4- Bromofluorobenzene (SS3)	130	70-130

ND- Not detected  
 TR - Trace

\*Value outside QC limits due to matrix interference.

## VOLATILE ORGANIC ANALYSIS

**CLIENT NAME:** Levine Fricke  
**PROJECT #:** ---  
**PROJECT NAME:** Calmar  
**MATRIX:** Air  
**SAMPLE VOLUME:** 0.02 Liter  
**INITIAL PRESSURE:** 13.00 psia  
**FINAL PRESSURE:** 20.50 psia  
**PRES. DILUTION :** 1 58  
**DILUTION FACTOR:** 1

**CLIENT SAMPLE ID:** CAS-2  
**AAI RFS#** 9723401  
**AAI ID#:** 9723401-002

**DATE SAMPLED:** 8/21/97  
**DATE RECEIVED:** 8/21/97  
**DATE ANALYZED:** 8/28/97

**ANALYTICAL METHOD:** EPA TO14 (GC/MS)

CAS NUMBER	COMPOUND	CONCENTRATION			
		mg/m3	PQL	ppm(v)	PQL
74-87-3	Chloromethane	ND<	0.8	ND<	0.4
74-83-9	Bromomethane	ND<	0.8	ND<	0.2
75-01-04	Vinyl Chloride	ND<	0.8	ND<	0.3
75-00-3	Chloroethane	ND<	0.8	ND<	0.3
75-69-4	Freon 11	ND<	0.8	ND<	0.1
75-35-4	1,1-Dichloroethene	ND<	0.8	ND<	0.2
76-13-1	Freon 113	ND<	0.8	ND<	0.1
75-09-2	Methylene Chloride	ND<	0.8	ND<	0.2
75-35-3	1,1-Dichloroethane	ND<	0.8	ND<	0.2
156-60-5	trans-1,2-Dichloroethene	ND<	0.8	ND<	0.2
156-59-2	cis-1,2-Dichloroethene	ND<	0.8	ND<	0.2
67-66-3	Chloroform	ND<	0.8	ND<	0.2
71-55-6	1,1,1-Trichloroethane	ND<	0.8	ND<	0.1
56-23-5	Carbon Tetrachloride	ND<	0.8	ND<	0.1
71-43-2	Benzene	ND<	0.8	ND<	0.2
107-06-2	1,2-Dichloroethane	ND<	0.8	ND<	0.2
79-01-6	Trichloroethene	ND<	0.8	ND<	0.1
78-87-5	1,2-Dichloropropane	ND<	0.8	ND<	0.2
10061-02-6	trans-1,3-Dichloropropene	ND<	0.8	ND<	0.2
108-88-3	Toluene	ND<	0.8	ND<	0.2
10061-01-5	cis-1,3-Dichloropropene	ND<	0.8	ND<	0.2
79-00-5	1,1-2-Trichloroethane	ND<	0.8	ND<	0.1
127-18-4	Tetrachloroethene	ND<	0.8	ND<	0.1
106-93-4	Ethylene Dibromide	ND<	0.8	ND<	0.1
108-90-7	Chlorobenzene	ND<	0.8	ND<	0.2
100-41-4	Ethylbenzene	ND<	0.8	ND<	0.2
1330-20-7	m,p-Xylene	ND<	0.8	ND<	0.2
95-47-6	o-Xylene	ND<	0.8	ND<	0.2
100-42-5	Styrene	ND<	0.8	ND<	0.2
79-34-5	1,1,2,2-Tetrachlorethane	ND<	0.8	ND<	0.1
108-67-8	1,3,5-Trimethyl Benzene	ND<	0.8	ND<	0.2
95-63-6	1,2,4-Trimethyl Benzene	ND<	0.8	ND<	0.2
541-73-1	1,3-Dichlorobenzene	ND<	0.8	ND<	0.1
106-46-7	1,4-Dichlorobenzene	ND<	0.8	ND<	0.1
100-44-7	Chlorotoluene	ND<	0.8	ND<	0.2
95-50-1	1,2-Dichlorobenzene	ND<	0.8	ND<	0.1
67-64-1	Acetone	4.7		2.0	
78-93-3	2-Butanone	ND<	0.8	ND<	0.3
108-10-1	4-methyl-2-pentanone	ND<	0.8	ND<	0.2
591-78-6	2-Hexanone	ND<	0.8	ND<	0.2
<b>Surrogate Recovery</b>		<b>% Recovery</b>			
1,2-Dichloroethane-D4 (SS1)		78		70-130	
Toluene-d8 (SS2)		105		70-130	
4- Bromofluorobenzene (SS3)		128		70-130	

ND- Not detected

\*Value outside QC limits due to matrix interference.

TR - Trace

## VOLATILE ORGANIC ANALYSIS

**CLIENT NAME:** Levine Fricke  
**PROJECT #:** ---  
**PROJECT NAME:** Calmar  
**MATRIX:** Air  
**SAMPLE VOLUME:** 0.02 Liter  
**INITIAL PRESSURE:** 14.00 psia  
**FINAL PRESSURE:** 20.20 psia  
**PRES. DILUTION :** 1.44  
**DILUTION FACTOR:** 1

**CLIENT SAMPLE ID:** CAS-3  
**AAI RFS#** 9723401  
**AAI ID#:** 9723401-003

**DATE SAMPLED:** 8/21/97  
**DATE RECEIVED:** 8/21/97  
**DATE ANALYZED:** 8/28/97

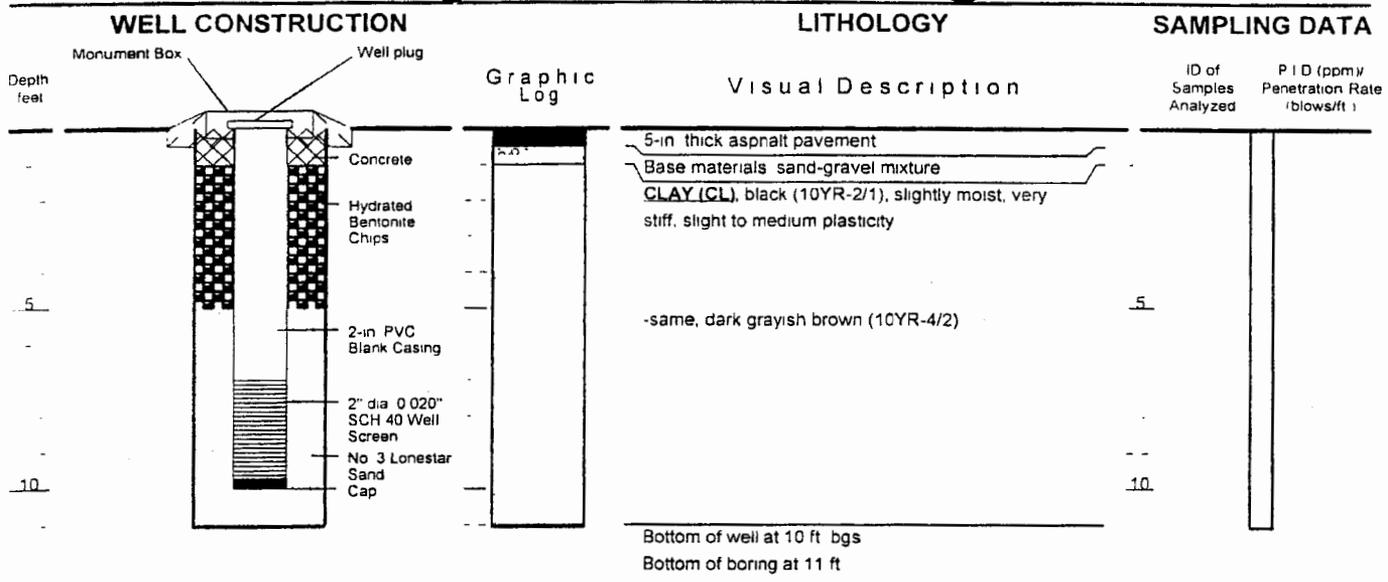
**ANALYTICAL METHOD:** EPA TO14 (GC/MS)

CAS NUMBER	COMPOUND	CONCENTRATION			
		mg/m3	PQL	ppm(v)	PQL
74-87-3	Chloromethane	ND<	0.7	ND<	0.3
74-83-9	Bromomethane	ND<	0.7	ND<	0.2
75-01-04	Vinyl Chloride	ND<	0.7	ND<	0.3
75-00-3	Chloroethane	ND<	0.7	ND<	0.3
75-69-4	Freon 11	ND<	0.7	ND<	0.1
75-35-4	1,1-Dichloroethene	ND<	0.7	ND<	0.2
76-13-1	Freon 113	ND<	0.7	ND<	0.1
75-09-2	Methylene Chloride	ND<	0.7	ND<	0.2
75-35-3	1,1-Dichloroethane	ND<	0.7	ND<	0.2
156-60-5	trans-1,2-Dichloroethene	ND<	0.7	ND<	0.2
156-59-2	cis-1,2-Dichloroethene	ND<	0.7	ND<	0.2
67-66-3	Chloroform	ND<	0.7	ND<	0.1
71-55-6	1,1,1-Trichloroethane	ND<	0.7	ND<	0.1
56-23-5	Carbon Tetrachloride	ND<	0.7	ND<	0.1
71-43-2	Benzene	ND<	0.7	ND<	0.2
107-06-2	1,2-Dichloroethane	ND<	0.7	ND<	0.2
79-01-6	Trichloroethene	ND<	0.7	ND<	0.1
78-87-5	1,2-Dichloropropane	ND<	0.7	ND<	0.2
10061-02-6	trans-1,3-Dichloropropene	ND<	0.7	ND<	0.2
108-88-3	Toluene	ND<	0.7	ND<	0.2
10061-01-5	cis-1,3-Dichloropropene	ND<	0.7	ND<	0.2
79-00-5	1,1,2-Trichloroethane	ND<	0.7	ND<	0.1
127-18-4	Tetrachloroethene	ND<	0.7	ND<	0.1
106-93-4	Ethylene Dibromide	ND<	0.7	ND<	0.1
108-90-7	Chlorobenzene	ND<	0.7	ND<	0.2
100-41-4	Ethylbenzene	ND<	0.7	ND<	0.2
1330-20-7	m,p-Xylene	ND<	0.7	ND<	0.2
95-47-6	o-Xylene	ND<	0.7	ND<	0.2
100-42-5	Styrene	ND<	0.7	ND<	0.2
79-34-5	1,1,2,2-Tetrachloroethane	ND<	0.7	ND<	0.1
108-67-8	1,3,5-Trimethyl Benzene	ND<	0.7	ND<	0.1
95-63-6	1,2,4-Trimethyl Benzene	ND<	0.7	ND<	0.1
541-73-1	1,3-Dichlorobenzene	ND<	0.7	ND<	0.1
106-46-7	1,4-Dichlorobenzene	ND<	0.7	ND<	0.1
100-44-7	Chlorotoluene	ND<	0.7	ND<	0.1
95-50-1	1,2-Dichlorobenzene	ND<	0.7	ND<	0.1
67-64-1	Acetone	1.8		0.8	
78-93-3	2-Butanone	ND<	0.7	ND<	0.2
108-10-1	4-methyl-2-pentanone	ND<	0.7	ND<	0.2
591-78-6	2-Hexanone	ND<	0.7	ND<	0.2
<b>Surrogate Recovery</b>		<b>% Recovery</b>			
1,2-Dichloroethane-D4 (SS1)		70		70-130	
Toluene-d8 (SS2)		112		70-130	
4- Bromofluorobenzene (SS3)		130		70-130	

ND- Not detected  
 TR - Trace

\*Value outside QC limits due to matrix interference.





Well Casing Elevation:

Date well drilled: 8/19/97

L • F • R Geologist/Engineer Adelio Denio

Approved by:  24126 5482

EXPLANATION

	Clay		Interval Sampled
	Silt		Sample Retained
	Sand		
	Gravel		

WELL CONSTRUCTION AND LITHOLOGY FOR WELL VE5

December 3, 1997

2455.01-102

Mr. Julio Lara  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754

**Subject:** Semi-Annual Data Report for July 1997 Groundwater Sampling and Analysis at the Calmar Facility, City of Industry, California (RWQCB File #102.55)

Dear Mr. Lara:

Attached is the July 1997 semi-annual groundwater sampling and analysis report for Calmar's facility located at 333 South Turnbull Canyon Road in the City of Industry, California. This report covers the second half of 1997. We anticipate the next groundwater sampling event to be completed in January 1998. If you have any questions or comments regarding this report, please call me at (714) 955-1390.

Sincerely,



Martin Hamann, R.G., C.H.G.  
Senior Project Hydrogeologist

Attachment

cc: Jim Jacks, Calmar

July 9, 1997

2455.01-202

Mr. Julio C. Lara  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza  
Monterey Park, California 91754

Subject: Response to June 19, 1997 RWQCB Letter Regarding Calmar, Inc., 333 South  
Turnbull Canyon Road, City of Industry, California (RWQCB File No. 102.0055)

Dear Mr. Lara:

Thank you for your letter dated June 19, 1997. This letter responds to your comments or questions concerning the upcoming pilot testing on the Site.

1. Attached to this letter are copies of QA/QC documentation corresponding to the soil samples collected in April 1997.
2. As requested, we will collect soil-gas samples using canisters. The samples will be delivered to a State-certified laboratory for analysis.
3. The RWQCB requested that we consider installing an additional soil-vapor extraction well across the sandy formation in the waste storage area. After thorough consideration, we have opted not to complete the well at this time. Based on the results of the upcoming vapor extraction activities, we will reconsider whether additional action in that area is warranted. We anticipate that vapor extraction activities in the upper zone will have an effect on the lower, sandier zone and will base the decision on completing a vapor extraction well in the lower zone after a review of the pilot test data. Additionally, we will collect vapor data in the lower zone to verify subsurface conditions prior to closure.

If you have any further questions, please contact either of the undersigned at (714) 955-1390.

Sincerely,



Martin E. Hamann, R.G., C.H.G.  
Senior Project Hydrogeologist



David E. Field, R.G.  
Senior Associate Hydrogeologist

Attachment

cc: Jim Jacks, Calmar, Inc.

**JONES ENVIRONMENTAL  
LABORATORY RESULTS**

<b>Client:</b>	Levine Fricke	<b>Report Date:</b>	04/10/97
<b>Client Address:</b>	1920 Main St., Suite 750	<b>JEL Ref. No.:</b>	A-2660
	Irvine, CA 92714	<b>Client Ref. No.:</b>	2455.97-01
<b>Attn:</b>	Richard Vogl	<b>Date Sampled:</b>	04/09/97
		<b>Date Received:</b>	04/09/97
<b>Project:</b>	Calmar	<b>Date Analyzed:</b>	04/09/97
<b>Project Address:</b>	City of Industry, CA	<b>Physical State:</b>	Soil

**EPA 8010 - Volatile Halogenated Hydrocarbons**

Calibration

<u>Parameter</u>	<u>10ng</u>	<u>20ng</u>	<u>50ng</u>	<u>100ng</u>	<u>200ng</u>
Cl2F2C	17044605	3318170	6745075	12768168	
Vinyl Cl	5883674	9847130	18855712	32294112	
CClH3	4971242	8319325	16528760	28750448	
Cl Ethane	6262394	10888072	21804192	37970976	
CBrH3	1137957	2213883	4987258	8454336	
CCl3F	4537245	7882237	15371520	27293248	
1,1-DCE	5869658	8695827	19277760	31696016	58974528
MeCl2	7083017	11010448	23412304	37528640	68484608
t-1,2DCE	9598086	14324488	29522048	46568704	83241920
1,1-DCA	8241699	13409912	27795664	49430368	86544896
2,2-DCPA	4583344	7457293	16840464	31364704	53622720
c-1,2-DCE	8951539	14203680	29270912	45418432	80422147
BrClCH2	6863456	10390968	21888128	39541216	68251328
Chloroform	11124952	17414704	35526880	61628320	10155E88
1,1,1-TCA	10718056	16695776	33755392	59510400	102159408
1,1-DCPE	9917203	13484608	25507200	43010848	73796288
CCl4	10848152	17968408	36182240	64583136	111861480
1,2-DCA	13817000	16180944	29015824	46770560	83491584
TCE	14675976	18336656	33106208	54596704	92386688
1,2-DCPA	14153448	16133808	29211088	48001904	82792960
BrCl2CH	7054115	10952736	23798976	37678624	68124992
Br2CH2	4353875	6133811	13596896	26279792	47182752
c-1,3-DCPE	10911320	11635032	21403232	35405440	62261472
t-1,3-DCPE	11354720	11527056	21094752	35313920	62463680
1,1,2-TCA	17138856	16737176	29208144	47320704	79236736
1,3-DCPA	13428816	13751416	23997024	39065056	68661120
PCE	9693171	1533656	31593248	55111680	88017536
Br2ClCH	4290851	7463994	16972624	26897184	50723552
1,2-DBE	7346173	7406461	13613400	23001024	43947904
ChloroBz	4497328	6222032	13758184	20560784	37026368
1,1,1,2-TCA	17808704	18092128	32810992	55121120	84999424
Bromoform	2952168	4640307	10186040	20149856	34917632
1,1,2,2-TCA	12006560	11805888	20481600	32291904	55877088
1,2,3-TCP	10558176	10278776	17230784	27000608	50743168
1,3-DCB	4646179	5742115	14976608	22754544	41550400
1,4-DCB	5436797	6609594	16528064	24528352	43891776
1,2-DCB	4868525	6027027	15286800	22636576	40544992

ND = Not Detected

**JONES ENVIRONMENTAL  
LABORATORY RESULTS**

<b>Client:</b>	Levine Fricke	<b>Report Date:</b>	04/10/97
<b>Client Address:</b>	1920 Main St., Suite 750	<b>JEL Ref. No.:</b>	A-2660
	Irvine, CA 92714	<b>Client Ref. No.:</b>	2455.97-01
<b>Attn:</b>	Richard Vogl	<b>Date Sampled:</b>	04/09/97
		<b>Date Received:</b>	04/09/97
<b>Project:</b>	Calmar	<b>Date Analyzed:</b>	04/09/97
<b>Project Address:</b>	City of Industry, CA	<b>Physical State:</b>	Soil

**EPA 8010 - Volatile Halogenated Hydrocarbons  
Calibration**

<u>Parameter</u>	<u>Retention Time (min)</u>	<u>Cal Factor</u>	<u>R 2</u>	<u>Cal Check 5.0 ml</u>	<u>Cal Check Area</u>	<u>Cal Check Diff</u>
Cl2F2C	5.28	121095	0.999	108.2	13820616	+8.2
Vinyl Cl	5.72	309858	0.990	107.7	34782112	+7.7
CClH3	5.51	261315	0.998	106.7	30665664	+6.7
Cl Ethane	6.51	348171	0.997	110.9	42116064	+10.9
CBrH3	6.80	80561	0.993	120.8	10214328	+20.8
CCl3F	6.99	249414	0.998	104.2	28429712	+4.2
1,1-DCE	7.47	277693	0.998	121.4	38470464	+21.4
MeCl2	8.26	319237	0.997	126.3	47390464	+26.3
t-1,2DCE	8.65	382937	0.996	112.1	52181632	+12.1
1,1-DCA	9.65	410460	0.997	102.0	50416192	+2.0
2,2-DCPA	10.66	258873	0.994	104.7	32831952	+4.7
c-1,2-DCE	10.54	369616	0.994	111.2	50508768	+11.2
BrClCH2	11.50	323722	0.996	104.9	41478976	+4.9
Chloroform	11.09	474217	0.991	100.7	62041152	+0.7
1,1,1-TCA	11.88	479935	0.998	102.8	61199200	+2.8
1,1-DCPE	12.34	336241	0.997	98.0	42153120	-2.0
CCl4	12.44	528933	0.996	100.5	64920064	+0.5
1,2-DCA	12.97	369112	0.999	100.7	47098624	+0.7
TCE	14.23	410864	0.998	100.4	54839108	+0.4
1,2-DCPA	14.64	388191	0.998	100.5	48247104	+0.5
BrCl2CH	14.82	317334	0.982	117.4	44243456	+17.4
Br2CH2	15.22	227902	0.996	111.3	29259968	+11.3
c-1,3-DCPE	16.24	275371	0.998	99.2	35122304	-0.8
t-1,3-DCPE	17.25	275690	0.999	95.6	33745536	-4.4
1,1,2-TCA	17.29	337198	0.997	97.3	46052526	-2.7
1,3-DCPA	18.10	297312	0.998	98.2	38361024	-1.8
PCE	18.05	411145	0.993	103.2	56869280	+3.2
Br2ClCH	18.38	240165	0.996	122.8	33017312	+22.8
1,2-DBE	19.08	196849	0.997	101.0	23230784	+1.0
ChloroBz	19.53	168927	0.997	113.5	23344128	+13.5
1,1,1,2-TCA	19.87	365722	0.990	97.1	53997696	-2.1
Bromoform	21.55	169619	0.996	117.3	23641024	+17.3
1,1,2,2-TCA	21.84	237051	0.997	93.7	30254944	-6.3
1,2,3-TCP	22.10	216406	0.995	94.2	25440672	-5.8
1,3-DCB	23.88	194061	0.993	105.2	23940832	+5.2
1,4-DCB	23.87	202013	0.991	105.3	25837472	+5.3
1,2-DCB	24.55	187171	0.991	105.2	23803568	+5.2

ND = Not Detected

**JONES ENVIRONMENTAL  
LABORATORY RESULTS**

<b>Client:</b>	Levine Fricke	<b>Report Date:</b>	04/10/97
<b>Client Address:</b>	1920 Main St., Suite 750	<b>JEL Ref. No.:</b>	A-2660
	Irvine, CA 92714	<b>Client Ref. No.:</b>	2455.97-01
<b>Attn:</b>	Richard Vogl	<b>Date Sampled:</b>	04/09/97
		<b>Date Received:</b>	04/09/97
<b>Project:</b>	Calmar	<b>Date Analyzed:</b>	04/09/97
<b>Project Address:</b>	City of Industry, CA	<b>Physical State:</b>	Soil

**EPA 8010 - Volatile Halogenated Hydrocarbons  
Method Blank Summary**

<u>Parameter</u>	<u>M B-1</u>	<u>M B-2</u>	<u>M B-3</u>
Cl2F2C	ND	ND	ND
Vinyl Cl	ND	ND	ND
CClH3	ND	ND	ND
Cl Ethane	ND	ND	ND
CBrH3	ND	ND	ND
CCl3F	ND	ND	ND
1,1-DCE	ND	ND	ND
MeCl2	ND	ND	ND
t-1,2DCE	ND	ND	ND
1,1-DCA	ND	ND	ND
2,2-DCPA	ND	ND	ND
c-1,2-DCE	ND	ND	ND
BrClCH2	ND	ND	ND
Chloroform	ND	ND	ND
1,1,1-TCA	ND	ND	ND
1,1-DCPE	ND	ND	ND
CCl4	ND	ND	ND
1,2-DCA	ND	ND	ND
TCE	ND	ND	ND
1,2-DCPA	ND	ND	ND
BrCl2CH	ND	ND	ND
Br2CH2	ND	ND	ND
c-1,3-DCPE	ND	ND	ND
t-1,3-DCPE	ND	ND	ND
1,1,2-TCA	ND	ND	ND
1,3-DCPA	ND	ND	ND
PCE	ND	ND	ND
Br2ClCH	ND	ND	ND
1,2-DBE	ND	ND	ND
ChloroBz	ND	ND	ND
1,1,1,2-TCA	ND	ND	ND
Bromoform	ND	ND	ND
1,1,2,2-TCA	ND	ND	ND
1,2,3-TCP	ND	ND	ND
1,3-DCB	ND	ND	ND
1,4-DCB	ND	ND	ND
1,2-DCB	ND	ND	ND
Reporting Limit	1.0	1.0	1.0
Surrogate 1	107	125	119
Surrogate 2	98	--	112
Surrogate 3	103	120	118

ND = Not Detected

JONES ENVIRONMENTAL

LABORATORY RESULTS

<b>Client:</b>	Levine Fricke	<b>Report Date:</b>	04/10/97
<b>Client Address:</b>	1920 Main St., Suite 750	<b>JEL Ref. No.:</b>	A-2660
	Irvine, CA 92714	<b>Client Ref. No.:</b>	2455.97-01
<b>Attn:</b>	Richard Vogl	<b>Date Sampled:</b>	04/09/97
		<b>Date Received:</b>	04/09/97
<b>Project:</b>	Calmar	<b>Date Analyzed:</b>	04/09/97
<b>Project Address:</b>	City of Industry, CA	<b>Physical State:</b>	Soil

EPA 8010 - Volatile Halogenated Hydrocarbons

Q/C Summary

Sample Result = ND

	<u>Spike</u>		<u>%</u>		<u>%</u>		<u>MS-MSD</u>	<u>RPD</u>
	<u>Conc.</u>	<u>MS</u>	<u>Recovery</u>	<u>MSD</u>	<u>Recovery</u>	<u>RPD</u>	<u>Limit</u>	<u>Limit</u>
1,1-DCE	50ng	55.7	112	57.5	115	3.1	60-140	<20%
TCE	50ng	48.4	97	49.8	100	2.8	60-140	<20%
ChloroBz	50ng	47.1	94	48.0	96	1.7	60-140	<20%

ND = Not Detected



Los Angeles  
Regional Water  
Quality Control  
Board

101 Centre Plaza Drive  
Monterey Park, CA  
91754-2156  
(213) 266-7500  
FAX (213) 266-7600

June 19, 1997

Mr. Jim Jacks  
CALMAR, INC.  
333 South Turnbull Canyon Road  
City of Industry, CA 91745



Pete Wilson  
Governor

SAN GABRIEL VALLEY CLEANUP PROGRAM - WORK PLAN REVIEW,  
CALMAR, INC. FACILITY, 333 SOUTH TURNBULL CANYON ROAD, CITY OF  
INDUSTRY, CALIFORNIA (FILE NO. 102.0055)

We are in receipt of the "Data Report for January and July 1996," received on November 22, 1996, "Semi-annual Data Report for January 1997," dated May 21, 1997, and "Site Assessment Report and Remedial Action Plan," dated June 12, 1997, submitted on your behalf, by your consultant, LEVINE-FRICKE-RECON. These submissions are in response to requirements included in our letters of January 8, 1997, and March 10, 1997.

#### GROUND WATER MONITORING

These reports summarize the results of the January 1996, July 1996, and January 1997 semi-annual ground water sampling events at the subject site. Upon review of the these reports, we have the following comments:

1. Analysis of ground water samples collected from the existing monitoring wells, during January 1997, detected maximum volatile organic compounds (VOCs) concentrations of 130 µg/l of PCE at piezometer P-2, 100 µg/l of TCE at P-2, 72 µg/l of 1,1-DCE at MW-7, 10 µg/l of 1,1-DCA at P-2, and 8.2 µg/l of c-1,2-DCE at P-2. The highest VOCs concentrations were detected in samples collected from piezometer P-2 located downgradient from the waste storage area.
2. Depth to ground water varied between 25.28' and 27.67' below ground surface (bgs), and the flow direction was approximately towards the northwest.

#### SOIL ASSESSMENT REPORT SECTION

This subsurface investigation report includes the analytical results of the soil matrix samples collected from the waste storage and the mold repair areas. Upon review of the soil assessment report section, we have the following comments:

1. During this phase of assessment, a total of twenty-six (26) soil matrix samples were collected from six (6) soil borings drilled to a maximum depth of 25' bgs. Laboratory analysis of these samples resulted in the detection of up to 74 µg/kg of PCE at 9.5' bgs, and 1.7 µg/kg of TCE at 15' bgs. VOCs concentrations were only detected in the waste storage area, and confirms previous findings
2. The following QA/QC information was not included in the subject report:



Mr. Jim Jacks

Page No. 2

- ◆ Laboratory quality control check.
- ◆ Initial calibration.
- ◆ Daily calibration data.

#### REMEDIAL ACTION PLAN

The subject work plan contains a proposal to conduct a soil vapor extraction (SVE) pilot test in the waste storage area. The pilot test data will be used for the design of a full-scale system for cleanup of the volatile organic compounds (VOCs) impacted vadose zone at the subject site. We have no objection to implementation of the proposed remedial work with the following provisions and comments:

1. Soil gas samples collected to monitor the progress of the remediation should be collected using canisters and promptly delivered to a stationary laboratory for analysis.
  
5. The installation of a soil vapor extraction well screened across the sandy formation (between 12' to 22' bgs) in the waste storage area must be considered. Up to 2,000 µg/l of PCE were detected at 17' bgs in this area.

A letter acknowledging the above changes in the work plan must be received prior to field work. The required assessment and remedial work must commence by **July 19, 1997**. Regional Board staff must be given a minimum of **7 working days** advance notice before commencement of field work. **Three copies** of a SVE pilot test report must be submitted within **30 days** of receipt of the analytical results. The next ground water monitoring event must be conducted during July 1997, and **three copies** of a monitoring report must be submitted by **August 30, 1997**. If you have any questions, please contact Julio C. Lara at (213)266-7541 and address all correspondence to his attention.

Your cooperation in completing the required assessment and remedial work at this facility is appreciated.

  
ARTHUR G. HEATH, Ph.D.  
Environmental Specialist IV

cc: Eugenia Chow, U.S. EPA, Region IX, San Francisco  
Carol Williams, San Gabriel Valley Watermaster  
Dave Field, Levine-Fricke-Recon

May 21, 1997

2455.01-01

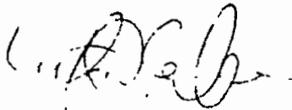
Mr. Julio Lara  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754

Subject: Semi-Annual Data Report for Groundwater Sampling and Analysis for January 1997,  
Calmar Facility, City of Industry, California (RWQCB File #102.55)

Dear Mr. Lara:

Attached is the January 1997 semi-annual groundwater sampling and analysis report for Calmar's facility located at 333 South Turnbull Canyon Road in the City of Industry, California. This report covers the first half of 1997. The subsequent groundwater data report will summarize both sampling events for 1997. We anticipate the next groundwater sampling event to be completed in July. If you have any questions or comments regarding this report, please call me at (714) 955-1390.

Sincerely,



Martin Hamann, R.G., C.H.G.  
Senior Project Hydrogeologist

Attachment

cc: Jim Jacks, Calmar  
Aldie Johnson, Calmar  
Bruce Howard, Latham & Watkins

REVIEW FORM

I. TO BE FILLED OUT BY PERSON RECEIVING REQUEST

Request Received by: H. Garcia Date: May 6, 1997

Person(s) who wish to review file(s)	Phone number	Representing	Address
<u>Lillieover</u>	<u>A</u>	<u>ATC</u>	

Purpose: F.R. PHASE I EFA FILE REVIEW

Files to be reviewed: Dixon, Acorn, Calmar, James Kelly

Appointment requested for: Date 5/6/97 Time: 1:00pm

II. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT

Appointment: Date 5/6/97 Time(s) 1:00 PM

Staff Contact: H. GARCIA Staff time expended: \_\_\_\_\_

III. TO BE FILLED OUT AFTER FILE REVIEW COMPLETED

For up to ten copies requested, collect \$4.00 with check payable to "Water Resources Control Board". Paid: \_\_\_\_\_

FOR PEOPLE MAKING COPIES: Make sure files are replaced in order and nothing is missing.

INITIAL HERE IF USING A COPIER: \_\_\_\_\_

I CERTIFY THAT I HAVE/WILL NOT REMOVE ANY FILES FROM THIS PREMISES, HAVE NOT ABUSED THE FILES AND HAVE REPLACED FILES IN THE ORDER IN WHICH THEY WERE PROVIDED TO ME.

X SIGNATURE OF REVIEWER: William J. Wood

RECORD OF COMMUNICATION	<input type="checkbox"/> Phone Call <input type="checkbox"/> Discussion <input checked="" type="checkbox"/> Field Trip <input type="checkbox"/> Conference <input type="checkbox"/> Other (specify)	
TO: File	FROM: Julio Lara	DATE: 04/09/97
SUBJECT: Subsurface soil investigation oversight at Calmar, Inc.		FILE NO: 102.0055

**SUMMARY OF COMMUNICATION:**

Board staff visited site to oversee the location and drilling of soil boring, and the collection of soil matrix samples. The work was being done according to the approved work plan and modifications. Two soil borings proposed in the mold repair area were being drilled with a hand auger and soil matrix samples collected with a spoon sampler. One of the boreholes was moved closer to the location once occupied by a dip tank that used 1,1,1-TCA. A drill rig was being used out-side the building in the waste storage area. In general the field work was acceptable.



1920 Main Street, Suite 750  
Irvine, CA 92614-7211  
(714)955-1390, FAX (714)955-0683

FAX TRANSMISSION: This cover page plus 0 pages.

Date	March 31, 1997		
Time	3:15PM		
From	Martin E. Hamann		

Deliver To	Mr. Julio Lara		
Name of Firm	LA Regional Water Quality Control Board		
FAX Number	213-266-7600	Project No.	2455.00

THE INFORMATION CONTAINED IN THIS FACSIMILE IS CONFIDENTIAL AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE PERSON RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, DO NOT USE OR DISCLOSE THIS FACSIMILE. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL TO LEVINE-FRICKE-RECON VIA THE U.S. POSTAL SERVICE.

**Comments:** Julio:

This fax is to notify you that we plan on commencing drilling at the Calmar facility (333 South Turnbull Canyon Rd., City of Industry RWQCB File 102-0055) at 8:00 am on Wednesday, April 9, 1997.

Additionally, in response to your letter to Calmar dated March 10, 1997:

1. Levine-Fricke-Recon (LFR) will drill one additional soil boring in the mold repair area and collect soil samples at 5 and 10 feet below ground surface.
2. Soil samples from borings drilled with hand auger will be collected in a stainless steel spoon sampler fitted with 4-inch long by 2-inch diameter brass sleeves.
3. Soil samples collected from the waste storage area will be collected from at least 2.5, 5, 10, 15, and 20 feet below ground surface. The 5, 10, and 15 foot samples will be analyzed and the others will be archived.

Please contact me if you have any questions or comments.

  
Martin Hamann

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

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



March 10, 1997

Mr. Jim Jacks  
CALMAR, INC.  
333 South Turnbull Canyon Road  
City of Industry, CA 91745

SAN GABRIEL VALLEY CLEANUP PROGRAM - WORK PLAN REVIEW, CALMAR, INC. FACILITY, 333 SOUTH TURNBULL CANYON ROAD, CITY OF INDUSTRY, CALIFORNIA (FILE NO. 102.0055)

We are in receipt of the "Work Plan for Additional Investigation in Preparation of the Remedial Action Plan," received on February 19, 1997, submitted on your behalf, by your consultant, LEVINE-FRICKE-RECON. This work plan proposes the collection of soil matrix samples to delineate the horizontal and vertical extent of volatile organic compounds (VOCs) impact to the vadose zone in the waste storage area, and assess the mold repair area. This submission is in general compliance with requirements in our letter of January 8, 1997. We have no objections to implementation of the proposed work, with the following conditions:

1. Drill one additional soil boring in the mold repair area, and collect soil matrix samples at 5' and 10' below ground surface (bgs) at each borehole. Also, the collection of soil matrix samples from boreholes drilled with a hand auger must be performed with a split spoon sampler fitted with 4-inch long by 2-inch diameter brass sleeves.
2. Analyze the soil matrix samples collected in the waste storage area at 5', 10', and 15' bgs. Samples collected at 2.5', and 20' bgs must be archived and later analyzed if VOCs concentrations are detected in the initial samples.
3. Board staff must be given a minimum of (7) seven working days advance notice of commencement of field work.

Field work must commence by **April 10, 1997**. The final report must be submitted within **30 days** of receipt of the analytical results. Please contact Julio C. Lara of our staff at (213) 266-7541 if you have any questions and address all correspondence to his attention.

Mr. Jim Jacks  
Page No. 2

Your cooperation in completing the required assessment and remediation work at this facility is appreciated.

  
Arthur G. Heath, Ph.D.  
Environmental Specialist IV

cc: Janet Whitlock, U.S. EPA, Region IX, San Francisco  
Dennis Dickerson, Cal-EPA, DTSC, Region 3  
Carol Williams, San Gabriel Valley Watermaster  
Dave Field, Levine-Fricke

102.0055 G97-0037 Jcl



February 18, 1997

2455,97-01

Mr. Julio C. Lara  
California Regional Water Quality Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754

Subject: Work Plan for Additional Investigation in Preparation of the Remedial Action Plan at the Calmar, Inc. Facility, 333 Turnbull Canyon Road, City of Industry, California (RWQCB File No. 102.0055)

Dear Mr. Lara:

Levine-Fricke-Recon (LFR) has prepared this letter in response to the January 8, 1997 letter submitted to Calmar, Inc., by the Los Angeles Regional Water Quality Control Board (RWQCB). As you are aware, LFR is working with Calmar to prepare a Remedial Action Plan (RAP) which addresses issues of impacted soil at the Calmar site.

### Introduction

On January 8, 1997, the RWQCB requested that the mold repair area of the Calmar site be assessed because the RWQCB considers it a potential source area. Additionally, the RWQCB requested further evaluation of affected soil in the waste storage area of the site. This letter outlines the steps that LFR will take to evaluate subsurface conditions around the mold repair and waste storage areas and to indicate when the RAP, which will include the results of the additional investigation, will be prepared for submittal to the RWQCB.

It should be noted that the RWQCB has requested that a RAP be submitted with the work plan to further evaluate the site. We feel that submitting a RAP before the completion of the required additional investigation would be premature and may result in a costly, incompletely designed remedial system. We therefore will prepare a RAP for submittal to the RWQCB after completion of the work required by the RWQCB. Recent conversations with Mr. Lara of the RWQCB indicated that this is agreeable to the RWQCB.

### Work Plan to Additionally Evaluate Soil Conditions

LFR has prepared the following work plan to additionally evaluate soil conditions at the Calmar facility located at 333 Turnbull Canyon Road, in the City of Industry, California. This work plan is based on the January 8, 1997 letter from the RWQCB which specifically requests additional investigations at two particular areas of the facility.

### ***Evaluation of the Mold Repair Area***

The mold repair area is located inside the main building of the Calmar facility (Figure 1). At this location, there is currently a Safety Clean tank area where degreasing and cleaning is conducted. Previously, prior to 1993, the cleaning products used contained 1,1,1-trichloroethane (TCA). LFR as well as previous consultants have investigated the areas around the mold repair area. These investigations included soil vapor surveys as well as the completion of two borings and nested vapor probes adjacent to the mold repair area (LFSB1/NVP1 and LFSB2/NVP1).

Results of all of the above-described investigations revealed only low concentrations of chlorinated hydrocarbons in the subsurface (Levine Fricke, 1995) indicating that the mold repair area does not appear to be a significant chlorinated hydrocarbon source area at the facility. However, there have been no soil samples collected adjacent to the former TCA usage area, so we propose completing one hand-auger soil boring in the area of the mold repair area to evaluate soil conditions at this location. Details of the boring are described below.

### ***Evaluation of the Waste Storage Area***

The RWQCB has requested additional evaluation of the vadose zone soils in the vicinity of the waste storage area. LFR will complete at least three additional soil borings around the area of the relatively elevated chlorinated hydrocarbon concentrations to further delineate soil conditions in the area. As a contingency, two to three additional step-out borings may be completed if soil concentrations at the borings did not appear to be delineated. Details of the borings are described below.

### **Scope of Work**

The following tasks will be completed to further evaluate soil conditions at the Calmar site.

#### ***Task 1: Prefield Activities***

Prior to sampling and excavation activities, LFR will prepare a site-specific Health and Safety Plan (HSP) in accordance with Occupational Safety and Health Administration regulations. The HSP documents potential hazards to workers on the site and specifies the appropriate means to mitigate or control these hazards. The HSP will also delineate the general safety procedures that will be required for the safe operation of mechanical equipment used for sampling and excavation activities at the site.

Prior to implementing subsurface sampling activities, LFR will have a utility clearance performed to identify underground utilities. The utility clearance will use magnetic and other electronic techniques in an attempt to provide clearance for underground utilities at specific locations. Underground Service Alert will also be notified at least 72 hours in advance of proposed trenching and sampling activities.

LFR will perform the above activities in an effort to avoid damaging underground utilities located at the Site. LFR will not be responsible, however, for damage to underground utilities that are not detected through the above activities. Certain utilities, such as nonpressurized sewer lines, nonpressurized storm drains, other nonpressurized drain lines, or utilities operated by the Department of Transportation are exempt from the notification requirements detailed in the Business and Professions Code 7110. Additionally, many nonpressurized lines are constructed of clay or other nonmetallic/nonconductive materials, rendering them undetectable by magnetic or other commonly used electronic detection methods.

### ***Task 2: Soil Borings***

LFR will complete at least four and up to seven soil borings around the two identified areas requiring additional investigation. One hand-auger boring will be completed inside the mold repair area and three borings will be completed near the waste storage area. If the extent of affected soil around the waste storage area is not adequately evaluated with the first three borings, up to three additional step-out contingency borings will be completed as needed. Borings outside the facility, where there is adequate access, will be completed with a continuous flight hollow-stem auger drilling rig. Borings completed indoors or in areas of limited access will be completed with a hand-auger. Figure 1 shows the proposed locations of the borings.

The hand-auger borings will be sampled at depths of 2 feet, 5 feet, and 10 feet below ground surface (bgs) or refusal. Soil samples collected will be logged for lithologic purposes and screened in the field for chemical vapor emissions using an organic vapor analyzer (OVA). Two soil samples will be selected from each hand-auger boring for laboratory analysis, based on visual indications of staining or OVA measurements.

The drilling rig borings will be sampled at depths of 2.5 feet below ground surface and at 5 foot intervals until groundwater is reached. Groundwater was recently measured at approximately 26 feet bgs. Three soil samples will be selected from each boring for laboratory analysis based on visual indications of staining or OVA measurements.

Soil sampling activities will be conducted in accordance with standard LFR protocols, which will be outlined in the final report. For budgeting purposes, we anticipate that drilling, hand-auguring, and sampling will take one to two days to complete, depending on the actual number of borings completed and assuming unrestricted access to the Site.

Soil cuttings and other waste materials generated from soil sampling activities will be containerized in DOT-approved drums. The drums will be appropriately labeled and temporarily left on site pending receipt of the analytical data and subsequent scheduling of disposal. Final disposal will be determined based on the actual volume of waste generated, evaluation of the analytical data, and determination of the most cost-effective disposal option. LFR is not and will not be interpreted to be a generator, storer, transporter, or disposer of hazardous waste, hazardous substances, pollutants, or contaminants found or identified at the site. Calmar will remain responsible for the disposal of such waste materials.

**Task 3: Laboratory Analyses**

A minimum of 11 soil samples (from one hand-auger boring and three auger borings) will be submitted for the following analyses:

- Halogenated organic compounds using EPA Method 8010

Soil samples will be analyzed in the field by Jones Environmental, a state-certified analytical laboratory. Jones Environmental is able to analyze the soil samples on an expedited schedule and provide RWQCB Well Investigation Program (WIP) deliverable quality assurance/quality control (QA/QC) documentation.

**Task 4: Reporting of Findings and Preparation of the Remedial Action Plan**

Upon completion of the subsurface investigation, LFR will prepare a remedial action plan (RAP) that will include the findings of our proposed investigation. The RAP will include a discussion of previous assessments, analytical data interpretations, and possible recommendations for further site characterization, if warranted. The report will also include descriptions of the methodologies used for the assessment and the technical rationale for the conclusions reached. The main focus of the RAP will be a description of appropriate response actions to address tetrachloroethene (PCE) at the Site.

A copy of the RAP can be prepared within four weeks of completion of the soil investigation. The RAP will be forwarded to the RWQCB for its review prior to implementation. We anticipate that one meeting may be needed between LFR, Calmar, and the RWQCB to finalize the details of the RAP.

If you have any questions or comments regarding the attached work plan for additional site characterization, please call either of the undersigned at (714) 955-1390.

Sincerely,

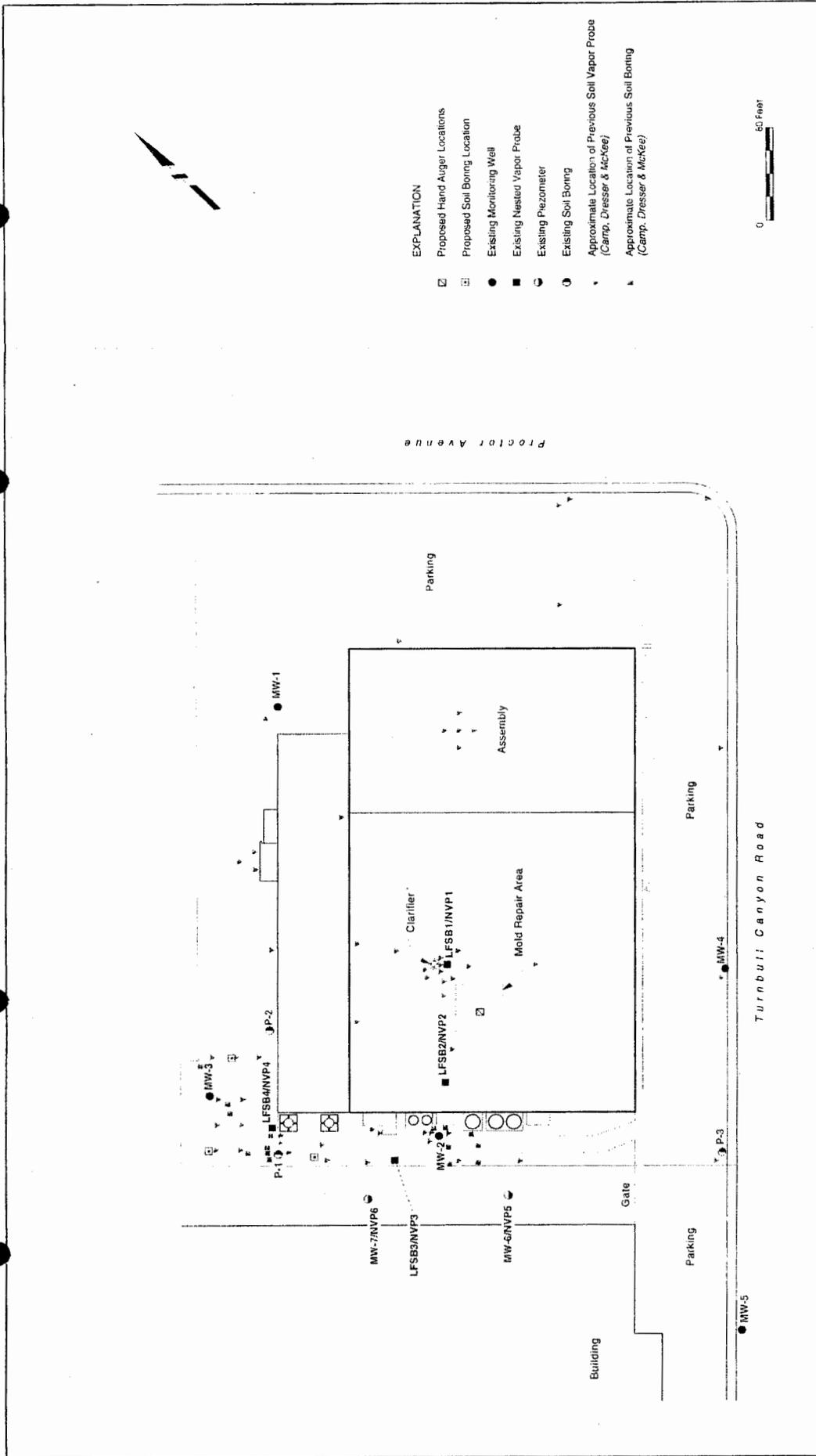


Martin E. Hamann, R.G., C.H.G.  
Senior Project Hydrogeologist



David E. Field, R.G.  
Senior Associate Hydrogeologist

Attachments



Contract

**Site Plan Showing Proposed Soil Boring Locations**

**Levine-Fricke-Recon**

Project No. 2455

**Figure 1**

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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



January 8, 1997

Mr. Jim Jacks  
CALMAR, INC.  
333 South Turnbull Canyon Road  
City of Industry, CA 91745

SAN GABRIEL VALLEY CLEANUP PROGRAM - REMEDIAL ACTION PLAN, CALMAR, INC. FACILITY, 333 SOUTH TURNBULL CANYON ROAD, CITY OF INDUSTRY, CALIFORNIA (FILE NO. 102.0055)

According to our records, we have not received a remedial action plan (RAP) pertaining to the cleanup of volatile organic compounds (VOCs) source areas at the subject site and quarterly ground water monitoring reports. The RAP was required in our letters dated June 21, 1995, and October 11, 1995. The last original due date was November 15, 1995. On a series of letters dated December 8, 1995, January 30, 1996, and March 6, 1996, your consultant, Levine-Fricke, requested an extension for the submittal of the RAP. Your consultant justified the extension request based on the need to "conduct site-specific modeling and develop a remediation strategy for the site," and "to await the results of a regional study being undertaken by a group of parties in the City of Industry area."

Also, during a telephone conversation held on August 15, 1996, your consultant requested a reevaluation by Board staff of the assessment data gathered from the subject site to justify the use of a fate and transport model as basis for site closure and waiver of remediation requirements. Furthermore, your consultant informed Board staff that two ground water monitoring reports for the last ground water sampling events would be submitted to this Regional Board as soon as possible. Upon review of the case file and re-inspection of the subject site, we have the following comments:

1. We reiterate our remedial requirements for the cleanup of the waste storage area. VOCs concentrations detected in the vadose zone in this area are above cleanup levels computed based on the attenuation factor methodology (AFM) included in this Regional Board's "Site Assessment and Cleanup Guidebook," May 1996 edition, and represent a threat to ground water quality.
2. Board staff believes that the assessment and cleanup of the vadose zone at this facility must be completed in a timely manner, and must not be subject to the results derived from the negotiations between the United States Environmental Protection Agency (USEPA) and the Puente Valley Steering Committee (PVSC), regarding regional scale ground water cleanup issues.

Mr. Jim Jacks

Page No. 2

3. During a Board staff site visit to your facility on January 6, 1997, you informed Board staff of your intention to remediate VOCs source areas with the use of soil vapor extraction (SVE) technology. In addition, Board staff was informed that chlorinated VOCs were used prior to 1993 for cleaning purposes in the mold repair area. 1,1,1-TCA was reported used in a dip tank located near the existent Safety Clean tank area. The mold repair area represents a potential source of VOCs impact to ground water quality and must be assessed.

Additional subsurface soil investigation is needed to complete our evaluation of the subject site. The purpose of this work is to evaluate the mold repair area, and delineate the horizontal extent of VOCs impact to the vadose zone of the waste storage area. A limited soil gas survey must be conducted at the mold repair and waste storage areas in accordance with the enclosed "Requirements For Active Soil Gas Survey." A proposal to conduct the required assessment work may be included within the RAP and implemented during the initial remedial work.

Board staff is prepared to meet with you and your consultant to design an assessment program that will produce the required results in a cost effective manner.

**Three copies** of a RAP and outstanding ground water monitoring reports must be submitted by **February 10, 1997**. Failure to comply with the Board's requirements is a violation of California Water Code (Division 7, Chapter 4, Article 4, Section 13267) and may result in appropriate enforcement action. Please contact Julio C. Lara of our staff at (213) 266-7541 if you have any questions and address all correspondence to his attention.

Your cooperation in completing the required assessment and remediation work at this facility is appreciated.



Arthur G. Heath, Ph.D.  
Environmental Specialist IV

cc: Janet Whitlock, U.S. EPA, Region IX, San Francisco  
Dennis Dickerson, Cal-EPA, DTSC, Region 3  
Carol Williams, San Gabriel Valley Watermaster  
Dave Field, Levine-Fricke

Enclosures

RECORD OF COMMUNICATION

- Phone Call     Discussion     Field Trip  
 Conference     Other (specify)

TO: DAVE FIELD  
LEVINE & FRICKE

FROM: JULIO C. LARA

DATE: 08/15/96

SUBJECT: CALMAR'S Remedial Action Plan

FILE NO: CALMAR  
102.0055

SUMMARY OF COMMUNICATION:

THE CONSULTANT FOR CALMAR, INC. COMMUNICATED TO BOARD STAFF CALMAR'S POSITION TO DELAY SVE SYSTEM INSTALLATION UNTIL THE APPROACH FOR REGIONAL CLEANUP IS DECIDED. CALMAR DOES NOT AGREE WITH THIS REGIONAL BOARD THAT REMEDIATION OF THE SITE IS WARRANTED. THEY PROPOSE A FATE & TRANSPORT MODEL TO DETERMINE THE NEEDS FOR CLEANUP. BOARD RESPONDED THAT WE WILL TAKE ANOTHER LOOK AT THE ASSESSMENT RESULTS AND DETERMINE IF REMEDIATION IS NEEDED.

LEVINE & FRICKE WILL SUBMIT REPORTS FOR THE LAST TWO GROUND WATER SAMPLING EVENTS.

CONCLUSIONS, ACTION TAKEN OR REQUIRED:

REVIEW FILE AND MAKE A DETERMINATION. WRITE A LETTER OF RESPONSE.

INFORMATION COPIES TO:

November 21, 1996

2455.00-15

Mr. Julio Lara  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754

Subject: Data Report for Groundwater Sampling and Analysis for January and July 1996,  
Calmar Facility, City of Industry, California (RWQCB File #102.55)

Dear Mr. Lara:

Attached is the January and July 1996 groundwater sampling and analysis report for Calmar's facility located at 333 South Turnbull Canyon Road in the City of Industry, California. If you have any questions or comments regarding this report, please call me at (714) 955-1390.

Sincerely,



David E. Field, R.G.  
Senior Associate Hydrogeologist

Attachment

cc: Aldie Johnson, Calmar  
Bruce Howard, Latham & Watkins

511 F STREET, N.W.  
WASHINGTON, D.C. 20540  
LOS ANGELES REGION

56 NOV 22 AM 11:29

501-3-0 11 9:00  
LC  
January 30, 1995

LF 2455-14

Mr. Julio Laia  
California Regional Water Quality Control Board  
101 Centre Plaza Dr.  
Monterrey Park, California 91754-2156

Subject: Request For Extension for Work Plan, Calmar Property,  
City of Industry, California  
File No. 102.055

Dear Mr. Laia:

In a letter to Calmar, Inc. (Calmar) dated October 11, 1995, the Regional Water Quality Control Board, Los Angeles Region, (RWQCB) requested that Calmar submit a work plan to conduct a soil remediation at the Calmar property located at 333 Turnbull Canyon Road, City of Industry, California ("the Site"). On December 8, 1995 Levine•Fricke sent a letter to the RWQCB requesting an extension until January 31, 1996. We are continuing to evaluate data from the Site to develop a remediation strategy and, therefore, request an additional extension to March 1, 1996.

If you have any questions or comments me at (714) 955-1390.

Sincerely,



David E. Field, R.G.  
Senior Associate Hydrogeologist

cc: Aldie Johnson, Calmar, Inc.  
Bruce Howard, Latham & Watkins

March 6, 1996

LF 2455-14

Mr. Julio Laia  
California Regional Water Quality Control Board  
101 Centre Plaza Dr.  
Monterrey Park, California 91754-2156

Subject: Request For Additional Extension For Work Plan,  
Calmar Property, City of Industry, California  
File No. 102.055

Dear Mr. Laia:

In a letter to Calmar, Inc. (Calmar) dated October 11, 1995, the Regional Water Quality Control Board, Los Angeles Region, (RWQCB) requested that Calmar submit a work plan to conduct a soil remediation at the Calmar property located at 333 Turnbull Canyon Road, City of Industry, California ("the Site"). On December 8, 1995 Levine•Fricke sent a letter to the RWQCB requesting an extension until January 31, 1996, and an additional extension until March 1, 1996, in a letter dated January 30, 1996.

We continue to await the results of a regional study being undertaken by a group of parties in the City of Industry area. The remedial actions that may be taken at the Calmar site may be significantly influenced by this study. The current expected completion for this study is March 29, 1996, and the regional RI/FS by April 1, 1996. Therefore, Calmar requests an additional extension to April 29, 1996, to facilitate the completion of the regional studies, time provide to evaluate the results and impact those results may have on the Calmar site, and to prepare the work plan for the Calmar site.

If you have any questions or comments me at (714) 955-1390.

Sincerely,



David E. Field, R.G.  
Senior Associate Hydrogeologist

cc: Aldie Johnson, Calmar, Inc.  
Bruce Howard, Latham & Watkins

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGIONCENTRE PLAZA DRIVE  
SAN ANTONIO  
SAN ANTONIO, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

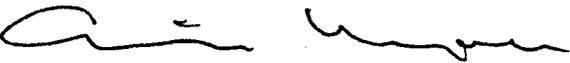
October 11, 1995

Aldie Johnson  
CALMAR, INC.  
333 South Turnbull Canyon Road  
City of Industry, CA 91745-1092WELL INVESTIGATION PROGRAM - WORK PLAN, CALMAR, INC. 333 TURNBULL  
CANYON ROAD, CITY OF INDUSTRY (FILE NO. 102.0055)

We are in receipt of your consultant's, Levine-Fricke, "Proposed Workplan for a Soil Cleanup Level Concentration at the Calmar Facility, City of Industry, California", dated August 25, 1995. This work proposes to evaluate VOC soil cleanup levels using fate and transport models. The work plan is in partial compliance with requirements in our letter of June 21, 1995. Board staff have no objections to implementation of the proposed work plan with the following comments:

1. The work plan proposes to use soil chemical transport models SESOIL and AT123D to evaluate soil cleanup level concentrations. The results will be compared to screening levels noted in our Assessment And Cleanup Guidance (February, 1995) in determining appropriate cleanup levels.
2. Upon determination of the required cleanup levels by Board staff, the initial phase of soil cleanup required in our letter of June 21, 1995, must be implemented.
3. Board staff recommends passive air injectors along the property boundary to prevent possible VOC migration from an adjacent property.

Three copies of a work plan for soil remediation must be submitted Board by November 15, 1995. If you have any questions, please contact Alan Hsu at (213)266-7543 and direct all correspondence to his attention.

  
Eric Nupen, R.G.  
Senior Engineering Geologistcc: Phillip Ramsey, U.S. EPA, Region IX, San Francisco  
Jorge Leon, Office of the Chief Counsel, SWRCB  
Dennis Dickerson, Cal-EPA, DTSC, Region 3  
Carol Williams, San Gabriel Valley Watermaster  
Carl Sjoberg, County of L.A., D.P.W., Industrial Waste Section  
Bruce Howard, Latham & Watkins  
David Field, Levine-Fricke

December 8, 1995

LF 2455-14

Mr. Julio Laia  
California Regional Water Quality Control Board  
101 Centre Plaza Dr.  
Monterrey Park, California 91754-2156

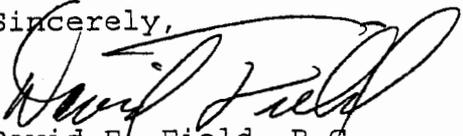
Subject: Request For Extension for Work Plan, Calmar Property,  
City of Industry, California  
File No. 102.055

Dear Mr. Laia:

In a letter to Calmar, Inc. (Calmar) dated October 11, 1995, the Regional Water Quality Control Board, Los Angeles Region, (RWQCB) requested that Calmar submit a work plan to conduct a soil remediation at the Calmar property located at 333 Turnbull Canyon Road, City of Industry, California ("the Site"). On behalf of Calmar, Levine•Fricke is requesting that the this work plan be submitted by January 31, 1995. This extension will allow us to conduct site-specific modeling and develop a remediation strategy for the Site.

If you have any questions or comments me at (714) 955-1390.

Sincerely,

  
David E. Field, R.G.  
Senior Associate Hydrogeologist

cc: Aldie Johnson, Calmar, Inc.  
Bruce Howard, Latham & Watkins

August 25, 1995

LF 2455.00-15

Mr. Alan Hsu  
California Regional Water Quality Control Board  
101 Centre Plaza Drive  
Monterey Park, California 91754-2156

Subject: Work Plan for Evaluation for a Soil Cleanup Level Concentration at the  
Calmar Facility, City of Industry, California, File No. 102.055

Dear Alan:

At the request of Calmar, Inc., Levine•Fricke's Work Plan for Evaluation for a Soil Cleanup Level Concentration at the Calmar facility located at 333 South Turnbull Canyon Road, City of Industry, California ("the Site") is enclosed. This work plan is in response to the California Regional Water Quality Control Board, Los Angeles Region's (RWQCB) request for a remediation work plan in a letter dated June 21, 1995.

The scope of work for the work plan includes an evaluation for a soil cleanup level concentration for tetrachloroethene (PCE) by modeling the fate and transport of PCE in the vadose zone and ground watery. Based on the observed increase of PCE concentrations in ground water that corresponded to a rise in ground-water levels, PCE is considered to be the primary criterion for soil remediation at the Site.

In the past, Calmar has expressed concern to the RWQCB about chemically affected soil and ground water found at the adjacent Hunsaker Management, Inc. (Hunsaker) property (also referred to as the former Futura Furniture Industries facility). As part of the Calmar site investigation, soil vapor probes and ground-water monitoring wells were installed by Calmar on the Hunsaker property. Elevated concentrations of chlorinated compounds, primarily trichloroethene (TCE), were detected in soil (up to 350 parts per million [ppm]), soil vapors (up to 140 micrograms per liter air), and ground water (up to 250 ppm). These data are reported in Levine•Fricke's report, "Soil and Ground-Water Investigation, Calmar Facility, City of Industry, California, Volume I," dated January 3, 1995.

95 AUG 28 AM 7:47  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

At the request of the RWQCB, Hunsaker conducted a soil gas survey at their site. The results of the survey showed concentrations of several chlorinated compounds in soil vapors at 5 feet below ground surface. Based on the results of the survey, the RWQCB concluded that the "traces of VOCs detected in soil at the subject site do not represent a threat to ground water or human health, or environmental health and do not require cleanup." The RWQCB stated in a letter to Hunsaker dated July 28, 1995, that no further action was required at the Hunsaker site.

This decision by the RWQCB has further heightened Calmar's concern about chemically affected soil and ground water at Hunsaker. The data from Calmar's investigation at Hunsaker was collected using permanently installed soil vapor probes at multiple depths in accordance with the RWQCB's Well Investigation Program (WIP). The data collected by Hunsaker was collected from shallow temporary soil gas probes. The difference in data collection methods may account for the considerable difference in analytical results.

The process and rationale for the RWQCB's decision to not require further action at Hunsaker, given all of the available data from the Hunsaker site, is not understood. As the RWQCB has requested Calmar to pursue remediation, Calmar is concerned that their remedial actions may result in the migration of contaminants from Hunsaker to Calmar.

This work plan is intended to provide information that will be necessary for soil remediation at the Site. However, Calmar will not want to implement full remedial actions until subsurface contamination issues at the Hunsaker site are clarified.

If you have any questions or comments about the work plan, please call Scott Ollivier, Project Engineer, or me at (714) 955-1390.

Sincerely,



David E. Field, R.G.  
Senior Associate Hydrogeologist

Attachment

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

June 21, 1995

Aldie Jonson<sup>h</sup>  
CALMAR, INC.  
333 South Turbull Canyon Road  
City of Industry, CA 91745-1092WELL INVESTIGATION PROGRAM - REPORT REVIEW, CALMAR, INC. 14923  
PROCTOR AVENUE, CITY OF INDUSTRY (FILE NO. 102.0055)

We are in receipt of your consultant's, Levine-Fricke, "Soil And Ground-Water Investigation-Calmar Facility", dated January 3, 1995, and "Data Report For Ground-Water Sampling And Analysis At The Calmar Facility", dated April 25, 1995. These reports present a summary of soil vapor, soil matrix and ground water assessment at the subject site. The reports are in general compliance with requirements in our letters of March 8, 1993, and December 16, 1993. Upon reviewing the reports, and after reinspecting the site on May 31, 1995, Board staff have the following comments regarding the objectives of the Well Investigation Program:

1. Soil Vapor Survey

- ◆ During the latest phase of assessment, four multi-depth nested vapor probes were installed to delineate the vertical extent of soil contamination. Analysis of soil vapor samples from three sampling events resulted in maximum VOC concentrations of 2,000 µg/l PCE (17' bgs), 1,100 µg/l PCE (5' and 12' bgs) from probe NVP4 located at west corner of the building of the subject site. Maximum concentrations of 81 µg/l TCE (20' bgs), 110 µg/l 1,1,1-TCA (5' bgs) and 100 µg/l 1,1-DCE (10' bgs) were detected in soil vapor samples from probe NVP6 on the neighboring Hunsaker property, south-west of the Calmar site. Depth to ground water was approximately 35' bgs.
- ◆ The PCE concentration distribution complements previous subsurface investigations conducted in December, 1990, and May, 1991, and confirms PCE soil contamination from ground surface to the water table from on-site sources.

2. Soil Matrix Analysis

- ◆ Soil samples were collected at multiple depths from four soil borings and from the boreholes drilled to install monitoring wells MW-4 through MW-7. Analysis of 40 soil matrix samples resulted in maximum VOC concentrations of 210 µg/l PCE (35' bgs) and 160 µg/l PCE (10' bgs) from NVP4/LFSB4. Elevated TCE concentrations (350 µg/l at 30' bgs/MW-6, 260 µg/l at 35' bgs/MW-6) and 1,1-DCE concentrations (91 µg/l at 30' bgs/MW-7,

28  $\mu\text{g}/\text{l}$  at 20' bgs/MW-7) were detected off site on the Hunsaker property.

- ◆ The results from soil matrix analysis confirm the findings of the soil vapor investigation, which demonstrate PCE soil contamination from ground surface to the water table from on-site sources, and TCE, 1,1,1-TCA and 1,1-DCE soil contamination on the adjacent property.

#### Ground Water Monitoring

- ◆ During this phase of investigation, four shallow ground water monitoring wells, MW-4 through MW-7, were installed to further characterize hydrogeologic conditions beneath the site. These new wells supplement six existing wells at the subject site. Quarterly ground water monitoring has been performed from April, 1993 through March, 1995. The historical ground water quality information, prior to April, 1993, was also included in the summary report submitted April 25, 1995.
- ◆ Ground water depth has fluctuated from 29' to 40' (currently 30') bgs and flows northward.
- ◆ Analysis of ground water samples from on-site wells resulted in maximum VOC concentrations of 410  $\mu\text{g}/\text{l}$  PCE at MW-3 and 150  $\mu\text{g}/\text{l}$  PCE at P-1, both located downgradient from the on-site PCE source area. Concentrations of 250  $\mu\text{g}/\text{l}$  and 260  $\mu\text{g}/\text{l}$  TCE were detected in ground water samples collected from MW-6 (on the neighboring site) and MW-2 (on-site, downgradient from MW-6), respectively. Concentrations of 120  $\mu\text{g}/\text{l}$  1,1-DCE (P-1) and 98  $\mu\text{g}/\text{l}$  1,1,1-TCA (MW-2) were also detected in ground water samples from wells downgradient from the potential off-site TCE source. Trace concentrations of 1,1-DCA were detected in most of ground water sample, with the highest concentration in samples from an upgradient well.
- ◆ The concentrations of VOCs in ground water appear to increase with the rising ground water elevations, indicating on-site (and possibly off-site) VOC sources continue to degrade ground water quality.

Considering the extent and magnitude of soil contamination at the subject site, soil cleanup is required to remove continuing sources of ground water contamination. The remaining assessment work needed to complete the determination of the horizontal and vertical extent of soil contamination can be performed during the initial phase of cleanup. Ground water monitoring must continue during soil cleanup.

Aldie Johnson  
Page 3

**Three copies** of a work plan that addresses the above noted soil remediation must be submitted by **July 31, 1995**. If you have any questions, please contact Alan Hsu at (213) 266-7543 and direct all correspondence to his attention.

A handwritten signature in black ink, appearing to read "Eric Nupen". The signature is fluid and cursive, with a large initial "E" and a long, sweeping underline.

Eric Nupen, R.G.  
Senior Engineering Geologist

cc: Phillip Ramsey, U.S. EPA, Region IX, San Francisco  
Jorge Leon, Office of the Chief Counsel, SWRCB  
Dennis Dickerson, Cal-EPA, DTSC, Region 3  
Carol Williams, San Gabriel Valley Watermaster  
Carl Sjoberg, County of L.A., D.P.W., Industrial Waste Section  
Bruce Howard, Latham & Watkins  
David Field, Levine-Fricke



**LEVINE·FRICKE**

ENGINEERS, HYDROGEOLOGISTS & APPLIED SCIENTISTS

May 16, 1995

LF 2455.00-12

Mr. Alan Hsu  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza  
Monterey Park, California 91754

Subject: Data Report for Third Quarter Ground-Water Sampling and Analysis for  
Calmar Facility, City of Industry, California

Dear Mr. Hu:

Attached is the ground-water monitoring report for the third quarter for Calmar's facility located in the City of Industry, California. If you have any questions or comments regarding this matter, please call me at (714) 955-1390.

Sincerely,

David E. Field, R.G.  
Senior Associate Hydrogeologist

Attachment

cc: Aldie Johnson, Calmar  
Bruce Howard, Latham & Watkins

1920 MAIN STREET, SUITE 750  
IRVINE, CA 92714  
(714) 955-1390  
FAX (714) 955-0683



**LEVINE·FRICKE**  
HEALTH, ENVIRONMENTAL & SAFETY CONSULTANTS

January 3, 1995

LF 2455:00-12

Mr. Alan Hu  
California Regional Water Quality Control Board  
101 Centre Plaza Drive  
Monterey Park, California 91754-2156

**Subject:** Soil and Ground-Water Investigation at the Calmar Facility, City of Industry, California

Dear Alan:

Enclosed is Levine-Fricke's Soil and Ground-Water Investigation report for the Calmar, Inc. facility located at 333 South Turnbull Canyon Road in the City of Industry, California ("the Site"). This report presents data up to June 25, 1994, for soil, ground-water, and vapor analysis.

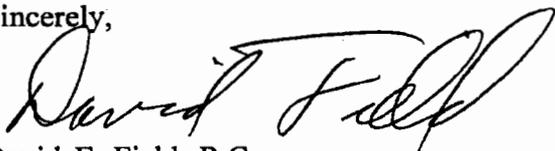
Based on previous investigations conducted by BCL Associates and Camp, Dresser & McKee, the California Regional Water Quality Control Board, Los Angeles Region requested further investigation at the Site. Calmar retained Levine-Fricke to conduct this soil and ground-water investigation.

Previous investigations have shown that ground water beneath the Site has been affected by chlorinated volatile organic compounds (VOCs). The objective of the current investigation was to assess the amounts and extent of these chemicals in the subsurface. The investigation included collection and analysis of soil, soil-vapor, and ground-water samples in areas that assisted in meeting this objective. The report also summarizes one year of quarterly ground-water sampling, from June 1993 to June 1994.

Based on the results of this investigation, tetrachloroethene was detected at elevated concentrations in the vicinity of LFSB-4/NVP-4. Trichloroethene found in ground water beneath the Calmar site appears to be from off-site, hydraulically upgradient sources.

If you have any questions or comments about this report, please call Don Eley, Project Hydrogeologist, or me at (714) 955-1390.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Field". The signature is fluid and cursive, with a large initial "D" and "F".

David E. Field, R.G.  
Senior Associate Hydrogeologist

Enclosure

FILE REVIEW FORM

I. TO BE FILLED OUT BY PERSON RECEIVING REQUEST

Request Received By: Alan Hsu Date: 11/28/94

Person(s) who wish to review file(s)	Phone number	Representing
<u>Lou Morrell</u>	<u>(818) 9155761</u>	<u>Bob Perez Adjuster</u>

Purpose: Correspondence Tracing

Files to be reviewed: Calmar, 102.0055

Appointment requested for: Date 11/29/94 Time: 1:00 pm

II. TO BE FILLED OUT BY PERSON SETTING APPOINTMENT

Appointment: Date \_\_\_\_\_ Time(s) \_\_\_\_\_

Staff Contact: Alan Hsu Staff time expended: \_\_\_\_\_

III. TO BE FILLED OUT AFTER FILE REVIEW COMPLETED

For up to ten copies requested, collect \$4.00 with check payable to "Water Resources Control Board". Paid: 4.00

FOR PEOPLE MAKING COPIES: Make sure files are replaced in order and nothing is missing.

INITIAL HERE IF USING A COPIER: AH

I CERTIFY THAT I HAVE/WILL NOT REMOVE ANY FILES FROM THIS PREMISES, HAVE NOT ABUSED THE FILES AND HAVE REPLACED FILES IN THE ORDER IN WHICH THEY WERE PROVIDED TO ME.

SIGNATURE OF REVIEWER: Lou Morrell

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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



December 16, 1993

Mr. Aldie Johnson  
Calmar, Inc.  
333 S. Turnbull Canyon Road  
P.O. Box 1203  
City of Industry, CA 91745

SITE MONITORING-CALMAR, INC. FACILITY, CITY OF INDUSTRY (FILE NO. 102.055)

The December 1, 1993, letter submitted on your behalf by your consultant Levine-Fricke, requesting discontinuing analysis of soil, soil vapor and groundwater samples by EPA Method 8020/602 at the above site, has been reviewed by staff. Staff concur that to date no significant BTEX compounds have been detected from the groundwater monitoring wells at the site, except for a trace amount of toluene. No data are yet available for staff to evaluate the soil vapor results, and no active soil sample analysis is being required at the site at this time. We cannot consider granting a waiver with respect to soil vapor analysis until the data have been submitted. However, in order to reduce costs, BTEX analysis of water samples by EPA method 602 may be performed annually instead of on a quarterly basis. This waiver is only granted for the existing groundwater monitoring system, and will not apply to soil vapor monitoring system, or any new assessment should it be necessary in the future.

If you have any questions please contact Mr. Charles Cheng at (213) 266-7533.

A handwritten signature in cursive script that reads "Craig Christmann".

Craig Christmann  
Associate Engineering Geologist

cc: Mr. Phillip Ramsey, U.S. Environmental Protection Agency,  
Region IX

Mr. Donald S. Eley, Levine-Fricke



**LEVINE-FRICKE**

December 1, 1993

LF 2455-15

Mr. Charles Chang  
California Regional Water Quality Control Board  
Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, California 91754

**Subject:** Discontinuing Analysis Using EPA Method 8020/602 at the Calmar Site  
in the City of Industry, Los Angeles County, California

Dear Mr. Chang:

As discussed in our phone conversation on November 31, 1993, chemical analysis using EPA Method 8020/602 has not detected benzene, toluene, ethylbenzene, or total xylenes (BTEX) above laboratory detection limits in soil and soil vapor at the Calmar site located in the City of Industry, Los Angeles County, California ("the Site").

Close review of historical ground-water data indicates that, of the BTEX compounds, only toluene has been sporadically detected above the laboratory detection limit of 1.0 parts per billion (ppb). The maximum toluene concentration detected in ground water at the Site was 2.7 ppb. This is well below the USEPA maximum contaminant level of 1,000 ppb for toluene.

Thus, analysis using EPA Method 8020/602 will no longer be conducted on soil, soil vapor, and ground-water samples obtained from the Site.

Please call David Field, R.G., Senior Associate Hydrogeologist, or me at (714) 955-1390 if you have any questions.

Sincerely,

Donald S. Eley  
Project Hydrogeologist

LEVINE-FRICKE

# FACSIMILE COVER SHEET

<b>Date</b>	6/9/93	
<b>Time</b>		
<b>Deliver to</b>	Charles Chang	
<b>Name of Firm</b>	RWQCB	
<b>Fax Phone No.</b>	(213) 266-7600	<b>LF Project No.</b> 2455-07
<b>From</b>	Don Eley	

NUMBER OF PAGES: This cover page plus One page(s)

For Voice contact call: (714) 955-1390  
 For Return Facsimile  
 message (714) 955-0683  
 Telecopy Operator: \_\_\_\_\_

Any questions or inquiries about missing pages or unreadable copy, please call (714) 955-1390

**Remarks** Please find attached our Draft  
 Table for Soil Vapor Analytical Results.  
 Note: of the W.L.P. Compounds, only  
 the compounds with positive hits are listed

1820 MAIN STREET, SUITE 750  
 IRVINE, CALIFORNIA 92714  
 (714) 955-1390

Other offices in EMERYVILLE, CA  
 SACRAMENTO/ROSEVILLE, CA  
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LEVINE•FRICKE

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**NUMBER OF PAGES:** This cover page plus two page(s)

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**Remarks** Start time will be 7:00 AM with Brian of Terra Tech Labs & Steve Friet of L-Fricke. Please find attached a Site Figure + a "draft" table of Vapor analytical data.

Client: CALMAR  
 333 S. Turnbull Canyon Rd.  
 City of Industry.

1930 MAIN STREET, SUITE 750  
 IRVINE, CALIFORNIA 92714  
 (714) 955-1390  
 Other offices in EMERYVILLE, CA  
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 ALBUQUERQUE, FL. HONOLULU, HI

NVP1 = LFSB1  
NVP2 = LFSB2  
NVP3 = LFSB3  
NVP4 = LFSB4

Table 1 :  
SOIL VAPOR ANALYSIS  
CALMAR City of Industry  
2455

Sample ID	Depth (ft)	CCl4	CB	CA	DBCM	DCFM	1,1-DCA	1,2-DCA	1,1-DCE	1,2-DCE (total)	DCM	1,1,2-PCA	1,1,1,2-PCA	PCE	1,1,1-TCA	1,1,2-TCA	TCE	TCFM	VC	BEN	EB	TOL	X
NVP1-1	4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP1-1	4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP1-1	4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-1	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-1	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-1	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-1	36	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-2	12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-2	12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-3	17	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-3	17	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	25.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	25.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	25.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP4-4	25.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP3-1	8	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP3-2	12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP3-3	18	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP3-4	25.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP3-5	34.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP2-1	4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP2-2	11	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP2-3	22.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP2-4	31	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP2-5	37	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP1-2	11	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP1-3	18	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP1-4	31	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
NVP1-5	39	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Detection Limit		<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<5.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0

0430930SE[fac] NOTES: All samples analyzed by Terra Tech Laboratories.

CCl4 Carbon Tetrachloride  
 CB Chlorobenzene  
 CA Chloroethane  
 DBCM Dibromochloroethane  
 DCFM Dichlorodifluoroethane  
 1,1-DCA 1,1-Dichloroethane  
 1,2-DCA 1,2-Dichloroethane  
 1,1-DC 1,1-Dichloroethane  
 1,2-DCE (total) 1,2-Dichloroethane (total)  
 DCM Dichloromethane  
 1,1,2-TC 1,1,2-Trichloroethane  
 TCE Trichloroethene  
 TCFM Trichlorofluoroethane  
 VC Vinyl Chloride  
 BEN Benzene  
 EB Ethylbenzene  
 TOL Toluene  
 X Total Xylenes

QA/QC

2455-101

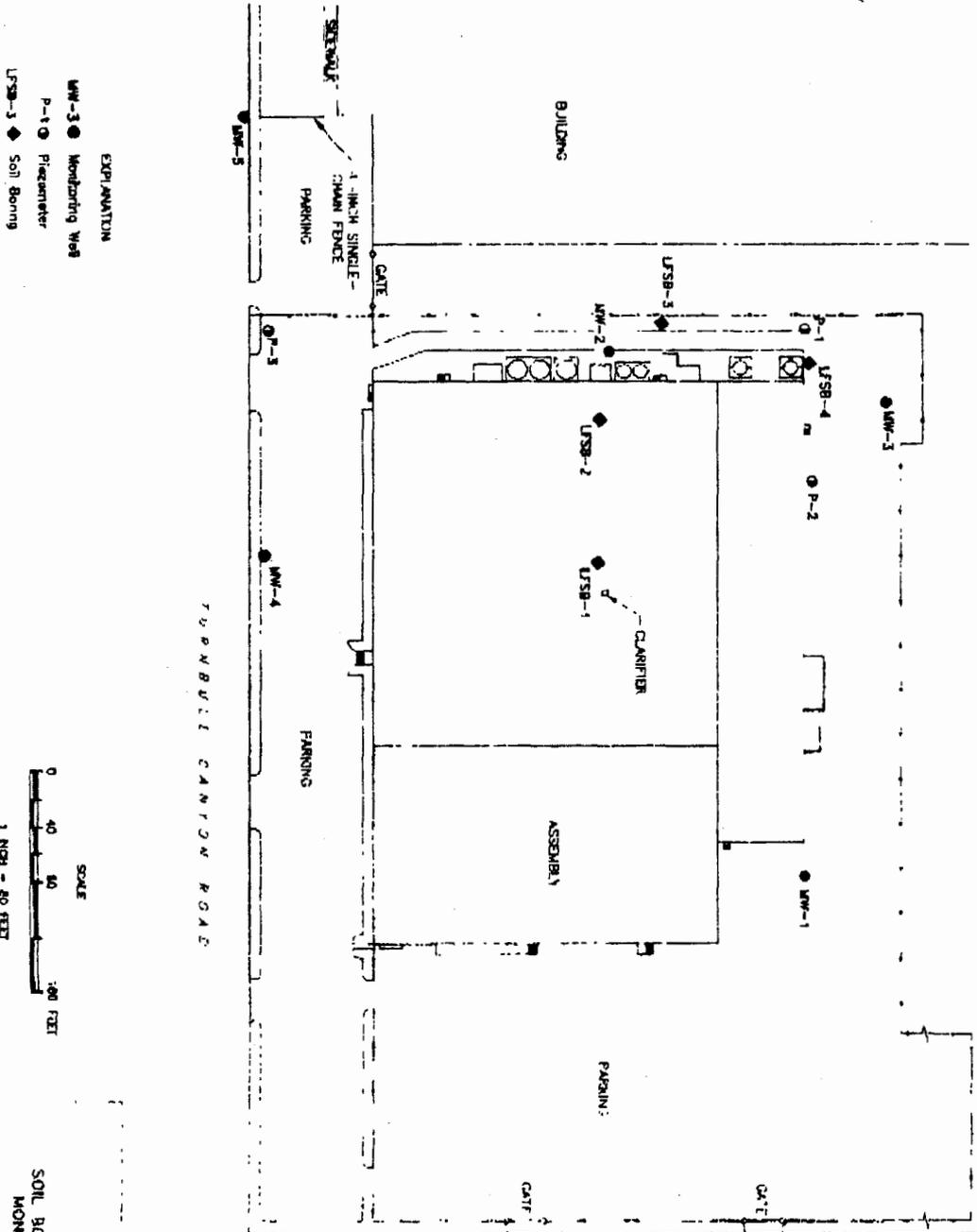


Figure 2  
 SOIL BORINGS AND GROUND-WATER  
 MONITORING WELL LOCATIONS

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