

**EXHIBIT B**

Jonathan B. Sokol  
D: 310.201.7423  
F: 310.201.2323  
JSokol@GreenbergGlusker.com  
File Number: 75772-00005

June 26, 2009

Via U.S. Mail and E-Mail

Tracy J. Egoscue  
Executive Officer  
California Regional Water Quality Control Board - LA Region  
320 West 4th Street, Suite 200  
Los Angeles CA 90013

Re: Garfield Express (UST File No. R-23001) -- Petition for Review of Cleanup and Abatement Order No. R4-2009-0045)

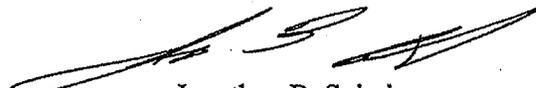
Dear Ms. Egoscue:

We represent Barry Ross, Trustee of the Louis Ross & Alice Ross Family Trust ("Ross"). Please find enclosed our client's Petition for Review of Cleanup and Abatement Order No. R4-2009-0045 issued by the California Regional Water Quality Control Board, Los Angeles Region ("Regional Board").

Ross hereby requests the Regional Board prepare the administrative record in this action.

Please contact me if you have any questions. Thank you.

Sincerely,



Jonathan B. Sokol

JBS/sl

cc: Barry A. Ross  
Roger J. Holt, Esq. Greenberg Glusker Fields Claman & Machtinger LLP

**EXHIBIT C**



iston H. Rickox  
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) 576-6700  
Internet Address: <http://www.swrcb.ca.gov/~ewqcb/>

CASE NO. CV 06-06574 VBF (VBK)

U-HAUL CO.

VS. ROSS TRUST

DEFENDANT'S EXHIBIT 8

DATE \_\_\_\_\_ IDEN.

DATE \_\_\_\_\_ EVID.

BY \_\_\_\_\_  
Deputy Clerk

December 12, 2000

Mr. Ben Johnson  
U-Haul International  
2721 North Central Avenue, Suite 700  
Phoenix, Arizona 85004

CERTIFIED MAIL  
RETURN RECEIPT  
CLAIM NO. Z 237 177 138  
AO 386-A

**UNDERGROUND TANKS PROGRAM - SITE INVESTIGATION  
U-HAUL LYNWOOD MOVING CENTER  
11716 LONG BEACH BOULEVARD, LYNWOOD (CASE NO. R-11239)**

Dear Mr. Johnson,

The California Regional Water Quality Control Board, Los Angeles Region, is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within Los Angeles and Ventura counties. As such, we are the lead regulatory agency for overseeing corrective action (assessment and/or monitoring activities) and cleanup of releases from leaking underground storage tank systems at the subject site. This case was referred to us by the County of Los Angeles Department of Public Works on November 2, 2000.

**1. Site Assessment Report**

We have reviewed the "Underground Storage Tank Removal Report," dated January 21, 1997, for the subject site. Based on our review of the data, the soil beneath the site was impacted by gasoline constituents including methyl tertiary butyl ether (MTBE) and the depth to groundwater is reported to be approximately 25-35 feet below grade. The lateral and vertical extent of the gasoline impact has not been fully defined in the soil and groundwater, therefore, you are required to submit a workplan to meet the following conditions.

1. Groundwater monitoring wells are required to assess the groundwater and to define the contamination plume beneath the site. The construction and development of groundwater monitoring wells must comply with the requirements prescribed in California Code of Regulations (CCRs), Title 23, Division 3, Chapter 16, Section 2649 (copy attached). Please submit a scaled map showing proposed locations in your workplan.
2. Your workplan must conform to Title 23, California Code of Regulations, Division 3, Chapter 16, Underground Storage Tank Regulations.
3. Soil samples must be collected at five-foot intervals in all soil borings for geologic logging and chemical analysis. All soil samples collected must be field screened for petroleum hydrocarbon using either a PID or FID for ambient air monitoring. All soil samples must be prepared per EPA Method 5035.

**California Environmental Protection Agency**

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PARCK
EX. NO. <u>8</u>
DATE: <u>5-27-08</u>
Sylvia P. Sherr No. 3010 Pages <u>4</u>

4. All soil and groundwater samples must be analyzed by EPA Method 8015 for TPH-G (gasoline), and EPA Method 8260B for BTEX, methyl tertiary butyl ether (MTBE), di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA). In addition, all other constituents detected between method detection limits (MDL) and the estimated quantifiable limits (EQL) must be reported (see the attached laboratory requirements dated 6/22/2000).
5. Following the initial groundwater monitoring well results, a quarterly monitoring and sampling program must continue for all wells and test results for the constituents listed in item #4 must be submitted by the fifteenth day following the end of each quarter as shown in the following schedule.

<u>Reporting Period</u>	<u>Report Due Date</u>
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

6. Prior to collecting groundwater samples, free product thickness (if present) must be determined and the water must be measured in all wells to be sampled, then the wells are to be properly purged until the temperature, conductivity, and pH stabilize, and the water is free of suspended and settleable matter, before samples are collected for analysis.
7. All groundwater monitoring wells must be surveyed to a benchmark for known elevation above mean sea level by a licensed land surveyor or registered civil engineer.
8. All reports submitted to this office must conform to the "Guideline for Report Submittal" (June 1993), published by the Los Angeles County Department of Public Works (copy enclosed). Please report all groundwater data in micrograms per liter ( $\mu\text{g/l}$ ). All analytical data must be reported by a California certified laboratory.
9. All work and technical reports must be performed by or under the direction of the registered geologists, certified engineering geologists, or registered civil engineers. A statement is required in the report that the registered professionals in direct responsible charge actually supervised or personally conducted all the work associated with the project. All technical submittals must contain a wet ink signature and seal by one of the registered professionals.
10. A site specific Health and Safety Plan must be submitted with your workplan.
11. You must submit a scaled map showing the locations and identification of all production wells and water bodies within one-mile radius of the site. Please indicate well owner, identification number, depth to groundwater, well type, screen interval, and distance from site.

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## II. Information Requirements

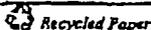
To help facilitate our review, we would appreciate that you provide the following information regarding the former tanks located on the property:

1. Facility contact person's name and telephone number.
2. Facility mailing address.
3. Tank removal and/or repair information, include tank size, contents, and gallons.
4. Tank disposal documentation.
5. Copies of all previous site assessment and/or remediation report(s), if any.
6. All previous soil and groundwater sample analytical results.
7. Submit the depth to drinking water aquifer and a scaled map showing the location and identification of all production wells and water bodies within a one-mile radius of the site.
8. Name and telephone number of your environmental consultant, if any.

Additionally, pursuant to recent changes of the California Health and Safety Code Chapter 6.75 (Section 25299.37.2) and Division 7 of the Porter Cologne Water Quality Control Act 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 underground storage tanks prior to considering corrective action and cleanup or case closure. Since you are identified as the current primary or active responsible party 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 titleholders for the subject site. Therefore, please provide the name, mailing address, and telephone for all record fee title holders for 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.

If site assessment and/or monitoring data provided for the corrective action work ongoing at the subject site indicate that release(s) from the underground storage tank systems have impacted offsite property(ies), then please provide the name, mailing address, and phone number for all record fee title holders for the subject site and any offsite property(ies) impacted by releases from the subject site, together with a copy of county record of current ownership (grant trust deed), available from the County Recorder's Office, for each property affected for verification.

*California Environmental Protection Agency*



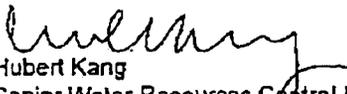
Mr. Johnson

- 4 -

December 12, 2000

Please submit the workplan and the requested information to this Regional Board by January 30, 2001. If you have any questions regarding this matter, please contact Mr. Thomas A. Sayles at (213) 576-6747 or by e-mail at [tsayles@rb4.swrcb.ca.gov](mailto:tsayles@rb4.swrcb.ca.gov).

Sincerely,

  
Hubert Kang  
Senior Water Resources Control Engineer

Enclosures

cc: Ms. Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank  
Cleanup Fund  
Mr. Bob Campbell, Water Replenishment District of Southern California  
Mr. Carl Sjoberg, Los Angeles County Department of Public Works, Environmental  
Programs Division

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Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board



Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura)

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>

CASE NO. CV06-06574 VBF (VBKx)

U-HAUL CO.

VS. ROSS TRUST

DEFENDANT'S EXHIBIT 142

DATE \_\_\_\_\_ IDEN.

DATE \_\_\_\_\_ EVID.

BY \_\_\_\_\_ Deputy Clerk

February 27, 2001

Mr. Reid Riner  
Amrco Real Estate Company  
2721 Central Avenue N., Suite 700  
Phoenix, AZ 85004

CERTIFIED MAIL  
RETURN RECEIPT REQUEST AO 386-A  
CLAIM NO. 7000 0520 0024 1126 1184

**UNDERGROUND TANK PROGRAM - DELINQUENT TECHNICAL REPORTS  
U-HAUL /LYNWOOD MOVING CENTER  
11716 LONG BEACH BOULEVARD, LYNWOOD (ID No. R-12239)**

Dear Mr. Riner:

Reference is made to our letter of December 12, 2000 (copy attached) that required you to submit the site assessment workplan and the requested information (information on facility, tank removal, previous site assessment and/or remediation and production wells) by January 31, 2001. Your January 31, 2001 letter, prepared by your consultant, Blaes Environmental Management, Inc., requested that site characterization activities at the U-Haul site be waived. The site characterization at the subject site must proceed independently of the ongoing site assessment work in regard to Garfield Express site (R-23001).

Pursuant to Section 13267(b) of the California Water Code, you are hereby directed to submit the delinquent technical reports (site assessment workplan and requested information) by **March 30, 2001**. Failure to submit the required technical reports by the due date specified will result in the imposition of civil liability penalties by this Regional Board of up to \$1,000 per day for each day the report is not received pursuant to Section 13268 of the California Water Code. These penalties can be assessed back to the original due date of January 31, 2001 if the technical reports are not received by March 30, 2001, and without further warning.

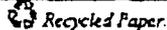
If you have any questions concerning this matter, please call Mr. David Bacharowski at (213) 576-6620 or Mr. Michael Yang at (213) 576-6659.

Sincerely,

Dennis A. Dickerson  
Executive Officer

**California Environmental Protection Agency**

\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



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17

Mr. Riner

- 2 -

February 27, 2001

Enclosure

cc: Mr. Jorge Leon, SWRCB, Office of Chief Counsel  
Ms. Yvonne Shanks, SWRCB, Underground Storage Tank Cleanup Fund  
Mr. Carl Sjoberg, L.A. County DPW, Environmental Program Division  
Mr. Bob Campbell, Water Replishment District of Southern California  
Mr. Dan Blaes, Blaes Environmental Management, Inc.

**California Environmental Protection Agency**

\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*

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**California Regional Water Quality  
Los Angeles Region**

**Don Skopac**  
Acting Agency Secretary

Recipient of the 2001 Environmental Leadership Award from Keep CA

370 W. 4th Street, Suite 200, Los Angeles, California 900  
Phone (213) 576-6600 FAX (213) 576-6640 Internet Address: <http://www.wq>

CASE NO. CV06-06574-VBE (VBK)

U-HAUL CO.

vs. ROSS TRUST

DEFENDANT'S EXHIBIT 16

DATE \_\_\_\_\_ IDEN \_\_\_\_\_

DATE \_\_\_\_\_ EVID \_\_\_\_\_

BY \_\_\_\_\_

Deputy Clerk

AO 386-A

May 18, 2006

Mr. Reid Riner  
Amerco Real Estate Company  
2721 Central Avenue N., Suite 700  
Phoenix, AZ 85004

**UNDERGROUND STORAGE TANK PROGRAM - GROUNDWATER MONITORING  
REQUIREMENTS  
U-HAUL FACILITY #712-28 (A-2 SITE)  
11716 SOUTH LONG BEACH BOULEVARD, LYNWOOD (CASE NO. R-12239)**

Dear Mr. Riner:

This letter is to address the issue of groundwater contamination detected at the subject property (the site).

**Site Background, Assessment and Monitoring Update**

Our records indicated that U-Haul/Amerco Real Estate Company have been the owner and operator of the site since 1978.

The site contained one 10,000-gallon gasoline underground storage tanks (UST) and one 550-gallon waste oil UST. In 1986, three groundwater monitoring wells (EX-1 through EX-3) were installed. EX-1 and EX-2 were installed in the area of the gasoline UST, and EX-3 was installed in the center of the site.

In 1996, two USTs were removed from the site. Soil samples taken from beneath the former waste oil UST detected up to 13 mg/kg of TRPH. Soil samples collected from beneath the former gasoline UST detected up to 0.30 mg/kg of TPHg, 0.027 mg/kg of benzene, and 0.091 mg/kg of MTBE.

In 2001, three additional groundwater monitoring wells (UH-1 through UH-3) were installed at the site under Regional Board staff direction. The soil samples taken from the borings detected up to 2,000 mg/kg of TPHg, 22 mg/kg of benzene, and 14 mg/kg of MTBE.

Currently, there are six monitoring wells on site. Wells EX-1 through EX-3 have not been sampled since 2001. Historically, up to 410,000 µg/L of TPHg, 36,000 µg/L of benzene, and 33,000 µg/L of MTBE were detected in the groundwater. Free product up to 10.45 feet thick has been observed at EX-1, EX-2, EX-3, and UH-1.

During the latest groundwater monitoring event conducted on December 5, 2003, up to 29,000 µg/L of TPHg, 5,500 µg/L of benzene, and 47,000 µg/L of MTBE were detected in the groundwater. Free product up to 8.38 feet thick was observed at EX-1, EX-2, EX-3, and UH-1.

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Mr. Reid Riner  
U-Haul # 712-28

-2-

May 18, 2006

During a meeting held at this Regional Board on May 31, 2002, Regional Board staff determined that it was evident that releases of fuel product did occur in 1998, and the fuel release has likely impacted the soil and groundwater beneath the site. Staff also determined that the total mass of the release did not appear to have caused the free product observed in the monitoring wells onsite. Therefore, staff required you to continue quarterly groundwater monitoring and submit groundwater monitoring reports. Since December 2003, however, you have discontinued groundwater monitoring activities at the site without concurrence from Regional Board staff.

#### Regional Board Staff Requirements

Based on the above assessment, Regional Board staff determined that releases of fuel product associated with the past operations at the site have impacted soil and groundwater beneath the site. Also, we understand your contention that the free product observed in some of the monitoring wells onsite may have originated from an adjacent site, such as Garfield Express that is hydraulically up-gradient of the subject site. Since as early as 2002, Regional Board staff has directed the responsible party of Garfield Express site to take corrective actions to mitigate soil and groundwater contamination at their site, and to extend their cleanup efforts to the subject site.

To adequately mitigate the soil and groundwater contamination at the subject site, you are directed to conduct the following:

- I. Grant reasonable access to the responsible party of Garfield Express site so that they can perform necessary site assessment and/or corrective action at the subject site; and
- II. Continue the groundwater monitoring program at the subject site.

The groundwater monitoring program must meet the following requirements:

1. Groundwater monitoring must be conducted and monitoring reports must be submitted according to the schedule outlined below, with the next monitoring report due by July 15, 2006:

<u>Reporting Period</u>	<u>Report Due Date</u>
January - June	July 15 <sup>TH</sup>
July - December	January 15 <sup>TH</sup>

2. All groundwater monitoring wells must be surveyed in to a benchmark of known elevation above mean sea level by a licensed land surveyor or registered civil engineer. Prior to collecting groundwater samples, free product thickness (if present) must be determined and the depth to water must be measured in all wells to be sampled. The wells are to be properly purged until the temperature, conductivity, and pH stabilize, and the water is free of suspended and settleable matter, before samples are collected for analysis. Any wells containing free product must be purged to remove any standing product, allowed to equilibrate to prepurged levels and free product thickness measured and removed. Free product removal must be conducted in accordance with California Code of Regulations, Title 23, Division 3, Chapter 18, Section 2655.

#### California Environmental Protection Agency

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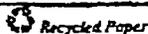
3. Groundwater samples must be analyzed by Cal-LUFT GC/FID or Cal-LUFT GC/MS Method for total petroleum hydrocarbons as gasoline (TPH<sub>g</sub>) and diesel (TPH<sub>d</sub>), and by EPA Method 8260B for BTEX, and fuel oxygenate compounds including methyl tertiary butyl ether (MTBE), di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA). Ethanol is also required and shall be analyzed by either method above. The analytical detection limits must conform to the Regional Board General Laboratory Testing Requirements (1/05) ([http://www.waterboards.ca.gov/losangeles/html/lab\\_report.html](http://www.waterboards.ca.gov/losangeles/html/lab_report.html)). All respective analytical methods must be certified by the California Environmental Laboratory Accreditation Program (ELAP). All analytical data must be reported by a California-certified laboratory.
4. Each groundwater monitoring report must also include the following:
  - A separate summary table containing current concentrations.
  - A summary table containing all historical data per each well with groundwater depth (or elevation) and well screen intervals.
  - A regional map depicting site vicinity business and street, etc.
  - A site plot plan depicting site location, tank and associated system locations.
  - A site map depicting all well locations and groundwater elevations (contour) with flow gradient and direction.
  - An isoconcentration map for TPH(g), benzene, MTBE, and TBA, respectively.
  - A hydrograph superimposing on concentration over time at the most impacted well for TPH(g), benzene, MTBE, and TBA (or at any other wells as warranted).

Prior to consideration of case closure, at least one round of groundwater monitoring must be conducted to include analyses of all common aromatic and chlorinated volatile organic compounds per EPA Method 8260B. If the site contains (or has contained) a waste oil tank, the full suite of aromatic and chlorinated analytes must also be tested and reported per EPA Method 8260B.

#### General Requirements

1. All work must be performed by or under the direction of a registered professional geologist, certified engineering geologist, or registered civil engineer. A statement is required in the report that the registered professional in direct responsible charge actually supervised or personally conducted all the work associated with the project. All technical submittals must contain a wet ink signature and seal by one of the registered professionals.
2. Regional Board staff must be notified 15 days before start of any fieldwork.
3. All reports must conform to the "Guidelines for Report Submittals" published by the Los Angeles County Department of Public Works.
4. All necessary permits must be obtained from the appropriate agencies prior to the start of any fieldwork.

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Mr. Reid Riner  
U-Haul # 712-28

-4-

May 18, 2008

Pursuant to section 13267(b) of the California Water Code, failure to submit the required technical report acceptable to the Executive Officer, by the due dates specified, may result in the imposition of civil liability penalties by this Regional Board of up to \$1,000.00 per day for each day each technical report is not received pursuant to section 13268 of the California Water Code. This Regional Board can assess these civil liability penalties at any time after the due dates specified below and without further warning.

If you have any questions, please contact Dr. Yi Lu at (213) 576-6695 or Arman Toumani at (213) 576-6758 or atoumani@waterboards.ca.gov.

Sincerely,

**ORIGINAL SIGNED BY**  
Jonathan S. Bishop  
Executive Officer

cc: Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank  
Cleanup Fund

Barry Ross, The Ross Family Trust  
5709 Jed Smith Road,  
Hidden Hills, CA 91302

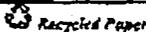
Don Vestal, Interim Redevelopment Director, City of Lynwood  
11330 Bullis Road  
Lynwood, CA 90262

Dan Blaes, Blaes Environmental Management, Inc. (Phoenix Office)

Leo M. Rebele, Brown and Caldwell

David Grande-Cassell, Clark Hill PLC  
212 East Grand River Avenue  
Lansing, MI 48906-4328  
dcassell@clarkhill.com

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**EXHIBIT D**



FUG-30-2000 08:05

DPW ENV PROG DIU

P. 83

# COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

100 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91801-1501  
Telephone: (818) 488-7100

T. A. TIDEMANSON, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1000  
ALHAMBRA, CALIFORNIA 91801-1000

December 17, 1988

IN REPLY PLEASE  
REFER TO FILE  
I-12239-2G

Lynwood Moving Center  
11716 Long Beach Blvd.  
Lynwood, CA 90262

Gentlemen:

HAZARDOUS MATERIALS UNDERGROUND STORAGE PROGRAM (HMUSP)  
LEAK DETECTION PROGRAM/TANK MONITORING PROGRAM (LDP/TMP)  
HMUSP NO. 3855  
FACILITY AT: 11716 Long Beach Blvd

This office reviewed the LDP/TMP proposal submitted on March 22, 1988  
for the subject facility.

In order to comply with the County's minimum LDP/TMP requirements, the information indicated on the attached Additional LDP/TMP Requirements sheet must be submitted to this office by January 11, 1989.

If you have any questions regarding this matter, please contact  
Mr. Ofori Amoh at (818) 7560.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works

By [Signature]  
Waste Management Division

Enc.

CC: Jirsa Environmental Services

LD302 3/88

CASE NO.	<u>CV06-06574-VB (VBK)</u>
VS.	<u>ROBERTS JR.</u>
DEFENDANT'S EXHIBIT	<u>3</u>
DATE	
DATE	
BY	

PARCK  
EX. NO. 3  
DATE 5-27-08  
Sylvia P. Shaw  
No. 2070 Page 2

FILE # Y-12239-2C  
HMSP # 3855LOS ANGELES COUNTY  
DEPARTMENT OF PUBLIC WORKS  
ADDITIONAL LDP/THP REQUIREMENTS

The additional information or requirements checked below must be submitted to the Los Angeles County Department of Public Works, Waste Management Division, P.O. Box 1460, Alhambra, CA 91802-1460, in order to complete evaluation of the LDP/THP proposal.

- 1. Plot plan to scale showing locations of tanks and associated piping, boring and monitoring well locations, buildings, adjacent streets, and north arrow.
- 2. Information pertaining to the tanks contradicts information previously submitted on the permit application form or hazardous substance storage statements. These contradictions must be corrected.
- 3. Number and location of soil and/or groundwater samples is not adequate.
- 4. Proposed sampling protocol.
- 5. Proposed sample analysis method(s).
- 6. Boring logs certified by a California registered geologist, California registered civil engineer with sufficient experience in soils, or a California certified engineering geologist.
- 7. Type of monitoring proposed is not appropriate for tank(s) number                     .
- 8. Documentation as to depth of groundwater at facility.
- 9. Monitoring well specifications and cross section showing well construction.
- 10. Monitoring well specifications do not conform to Los Angeles County guidelines for the groundwater condition.
- 11. Manufacturer and model number of monitoring sensor or device(s).
- 12. Manufacturer and model number of pressure line monitoring system.
- 13. Manufacturer and model number of overflow protection device.
- 14. Tank integrity test results and data sheets.
- 15. Manufacturer and model number of Tank Level Monitor (TLK) system.
- 16. Pressurized pipelines must be shown on the plot plan.
- 17. Monitoring for pressurized pipelines is required.  
*Groundwater samples were required after its encroachment.*
- 18. Other: *Contact the California Regional Water Quality Control Board (CRWQCB) for sampling procedures and other parameters needed for the analysis. Use EPA 602.*

LD302 Rev. 3/88



COUNTY OF LOS ANGELES

RECEIVED

DEPARTMENT OF PUBLIC WORKS NOV -2 P 3 34

100 SOUTH FLEMING AVENUE  
ALHAMBRA, CALIFORNIA 91801-1131  
Telephone: (818) 491-3100

THOMAS A. TIDEMANSON, Director

CALIFORNIA

TO:

July 13, 1994

Mr. Ray Parck  
U-Haul Corp of Los Angeles-West  
964 South La Brea  
Inglewood, CA 90301-1715

Post-Net Fax Note	7671	Date	2/3/01
To	Parck	From	Michael Chang
City	Los Angeles	Co	LA
Phone		Phone	
Fax	602-728-0708	Fax	

NOTICE OF NON-COMPLIANCE  
HAZARDOUS MATERIALS UNDERGROUND STORAGE PERMIT (HMUSP)  
FACILITY LOCATION: 11716 LONG BEACH BOULEVARD, LYNNWOOD

You were notified on December 12, 1988 to submit to this office on or before January 13, 1989 the item(s) checked below:

- HMUSP application and/or accompanying fees.
  - Tank integrity test results for the underground containers at the above location.
  - Leak Detection Program (LDP).  Tank Monitoring Program (TMP).
  - LDP/TMP corrections.  LDP/TMP final report.
  - Assessment report following closure of the following containers:
- 
- Site investigation proposal.  Remedial action plan.
  - Progress report for the month of \_\_\_\_\_.
  - Other Additional LDP/TMP requirements: Groundwater samples were required after its encroachment.

As of this date, our records show that you have not responded. Please be advised that the required information must be submitted to this office by Sept 13, 1994. Failure to comply with this notice will result in the initiation of enforcement measures.

If you have any questions, please contact Mr. Jose Palayo of this office, at (818) 458-3516, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Acting Director of Public

By *[Signature]*  
Waste Management Division

UST1\NC401 Rev. 10/91

CASE NO. 066-06574 VBE (VBK)

U.S. FEDERAL COURT

VS. ROSS TRUST

DEFENDANT: SCHIBT

DATE

DATE

BY

AG

Parck

EX. NO. 4

DATE: 5-27-08

Page 1

**EXHIBIT E**

1 1992 to 1996; correct?

2 A Right. I had not seep those.

3 Q Have you since had an opportunity since those were  
4 attached to his supplemental leal report in this matter  
5 and you heard his testimony in this matter to factor  
6 those into your opinions as to the source of the  
7 contamination?

8 A Yes.

9 Q What is your opinion regarding the reliability of  
10 those tank testing records that have been discussed  
11 during the trial?

12 A My opinion is that they are not reline.

13 Q And what is your opinion based on?

14 A Well, it is based on my own experience with tank  
15 testing. The type of test that was done is very deponent  
16 dent on a number of tests being done correctly and  
17 following the appropriate guidelines for administering  
18 that test. And from my review of the tests I can't see  
19 that those guidelines were met. In fact I can see that  
20 they weren't met on several fronts.

21 Q All right. Can you explain to the jury when you  
22 say that the protocol to perform these tests was not what  
23 met what you mean specifically?

24 A Well, the two most important protocols are that the  
25 probe that is used to collect a sample of the gas next to

1 the tank has to be within 10 feet of any point on the  
2 tank, and based on my calculation, the southern end of  
3 the tank at the bottom of the tank is over 10 feet from  
4 the closest probe location. Which would make the test  
5 unreliable.

6 A second factor is that the tests specifically  
7 say that the back fill material, if the probes are  
8 installed in the back fill material which we can't  
9 verify, and in fact, Mr. Blaes testified that he didn't  
10 see any probes in the tank back fill material when the  
11 tank was removed so that tells me they were probably  
12 installed in the soil out side of the back fill which is  
13 very low permeability soil.

14 And one of the protocols is that the per  
15 admissibility of the material that this gas has to travel  
16 through to get to the probe needs to be very high. And  
17 we talked about this figure of one Darcy during Dr. Rick  
18 sister's testimony, and the native soils around this tank  
19 are nowhere near going to qualify for that one Darcy  
20 permeability level.

21 The other thing that concerns me about these  
22 tests is that the waste oil tank was tested using this  
23 same method over the same timeframe and when it was  
24 removed, it had 10 holes in it, and also had stained soil  
25 we neath it. And these two things tell me that that tank

1 was leaking and that these tank test results did not pick  
2 up the leaks from that tank. So it makes me suspect of  
3 those tank test results for the gasoline tank as well.

4 Let me \go ahead\get, and when you were  
5 talking about the placement of the probes in the back  
6 fill just so we can illustrate this to the jury I want to  
7 go ahead and put up again figure 1 that was published err  
8 earlier from Dr. Richter's report which was Exhibit 121  
9 in this matter. Is that all right, your Honor?

10 THE COURT: Exhibit 121. Yes. Which part.

11 MR. SOKOL: It was published earlier.

12 THE COURT: Yes. Thank you.

13 Q BY MR. SOKOL: In this particular figure attached to  
14 Dr. Richter's report

15 THE COURT: Do you have a page or an ID number for  
16 this for the record.

17 MR. SOKOL: Gentlemen your Honor.

18 Q This is from Exhibit 121 this would be figure 1 to  
19 Exhibit 121 and there is a page 2 at the bottom?

20 A Thank you.

21 Q I am pointing to an area that is identified as back  
22 fill which is around the area of the underground storage  
23 tank. Do you see that?

24 A Yes.

25 Q Is that the area that you were referring to earlier

1 when you said it was important to have the probe in that  
2 area?

3 A Yes.

4 Q Would you explain to so the jury understands this,  
5 what happens with this this type of a test where the  
6 probe is placed out in the native soil here away from the  
7 back fills as far as the reliability of this particular  
8 testing?

9 A Well, the way they do this test is they take a  
10 proprietary but very volatile compound that he vantage  
11 point waits very quickly, and they put that in the tank,  
12 and they count on that particular compound leaking out of  
13 the tank into the back fill, and then being detected by  
14 this probe in the back fill. But if the robe is in the  
15 native soil, and that native soil is not very permeable,  
16 then that probe is not going to detect that leak compound  
17 even though it is in the tank back fill.

18 Q From reviewing the testing reports and documents  
19 themselves which talked about the number of samples  
20 taken, and how long it took the samples, were you able to  
21 determine whether in fact these probes that they were  
22 using were permanently installed or whether this is  
23 something that would be put in I ever accept TKPWEL time  
24 you did the test?

25 A Well, in my opinion, if you are going to use this

1 method, you would put the probes in the first time, and  
2 then use those same probes he have time, every year to do  
3 your annual test. And based on the figures that were  
4 included with the tank test results, that is what it  
5 appears these probes are in exactly the same location  
6 every year.

7 Q So you -- would U expected, then, that when  
8 Mr. Blaes removed the tanks, if the problems were probes  
9 were properly installed in the back fill you would have  
10 found them when he removed the tank; correct?

11 A Right.

12 Q All right. Lastly, before turning to your opinion  
13 on the cost, you have sat through here and you have heard  
14 Dr. Richter's testimony, and his discussion about an  
15 estimate of 40,000-gallons of free product in the project  
16 area, and there were references by either him or  
17 Mr. Blaes to a quote, unquote cat STRAF I can release at  
18 the Garfield express site. And there was also a  
19 discussion related to that of a certificate run on a  
20 pancake type metaphor from this type of a release. Do  
21 you have an opinion in response to what you heard in that  
22 regard?

23 A Yeah. I don't think there is that type, that  
24 volume of gasoline under both sides at all. I looked for  
25 some kind of reference or discussion of how that number

**EXHIBIT F**

EXCAVATION: 11/4/96 WAYNE PERCY - MICHAEL HOLT

TANK CLEANING: 11/5/96 ADAMS SERVICES

MARINE CHEMIST 11/5/96 THOMAS D. BECK & ASSOC. INC LONG BEACH, CA

FIRE INSPECTOR: JEROME SAMUEL

CITY OF LYNNWOOD  
INSPECTOR  
BUREAU OF

CASE NO. CV06-06574 VBF(VBKX)

U-HAUL CO.

(310) 603

VS. ROSS TRUST

DEFENDANT'S EXHIBIT 140

FH (310)

DATE

IDEN.

LYNNWOOD F

DATE

EVID.

3161 CAMP

BY

LYNNWOOD

AO 386-A

Deputy Clerk

TANKS { 1-10,000 gallon Gasoline Tank  
Fiberglass  
1-550 waste oil - steel

A 67623 WT 2590

PUBLIC WORKS INSPECTOR:

I. AZIE

LOS ANGELES COUNTY - DEPT. OF PUBLIC WORKS

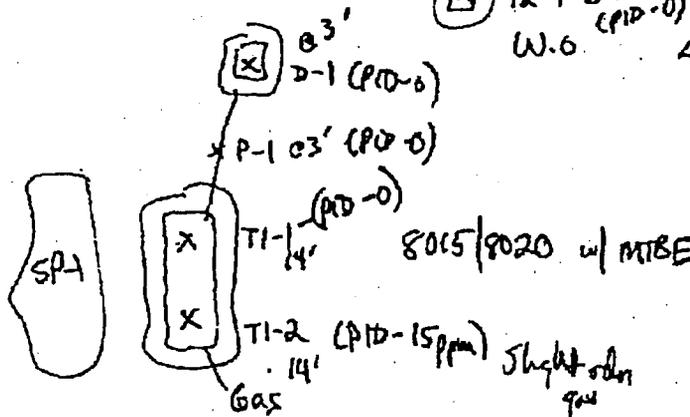
ENVIRONMENTAL PROGRAM DIVISION

(310) 534-4862

(X) T2-1 @ 7' (PID-0)

W.O.

4/8.1 and 8020  
8010



Holes in bottom of Waste Oil tank  
No holes in Fiberglass Container

Soil Type 0-3' Sand, (SP) well graded  
3-8' Sand (SM) silty  
8-14' Clay, silty, sandy, calcareous



U-HAUL CENTER LYNNWOOD  
11718 LONG BEACH BOULEVARD • LYNNWOOD, CALIFORNIA 90262



11716 LONG BEACH BOULEVARD

LYNWOOD, CALIFORNIA 90262-4326

U-HAUL FACILITY # 71A-28

U-HAUL → RICK HUERTA (SITE MANAGER) → (310) 637-9395

HOSPITAL → UNITED HEALTH MEDICAL CENTERS DIVISION → (310) 900-4525  
3630 EAST IMPERIAL HIGHWAY

FIRE DEPT → LYNWOOD FIRE DEPARTMENT → 911 OR (310) 886-0416  
3161 IMPERIAL HIGHWAY (0.6 miles)

FIRE DEPT → LA COUNTY FIRE DEPARTMENT → (310) 638-6121  
1815 EAST 120TH STREET (1.9 miles)

---

**EXHIBIT G**

# **EXPERT REPORT**

November 2008

Prepared for:

**Greenberg Glusker**  
1900 Avenue of the Stars, 21<sup>st</sup> Floor  
Los Angeles, California 90067

**Case:** U-Haul International, Inc., et al v. Barry Ross  
U. S. District Court Case No. CV 06-06574 VBF(VBFx)

**Site:** 11716 Long Beach Boulevard  
Lynwood, California

Prepared by:

Nancy T. Bice, P.G., C.E.G.

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consultants

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## 1. INTRODUCTION

I have been retained by Greenberg Glusker in U-Haul International, Inc., et al v. Barry Ross, Case No. CV 06-06574 VBF(VBFx) in the United States District Court for the Central District of California, to offer expert opinions on the source, fate, and cleanup costs associated with contaminants present at two adjacent commercial properties located in Lynwood, California. The Louis Ross and Alice Ross Family Trust (Ross Trust) owns one of the properties, located at 11600-11620 Long Beach Boulevard (the "Garfield Express Site"). Plaintiff Amerco Real Estate Company (an affiliate of plaintiff U-Haul International, Inc.) owns a portion of the other property, located at 11716 Long Beach Boulevard (the "U-Haul Site").

### 1.1 Objectives and Scope of Work

The overall objectives of this retention are to assess the source and fate of gasoline contamination present at the U-Haul Site and to estimate the cost to clean up contamination at both sites. Specific objectives are to: (1) evaluate the likelihood that a petroleum release at the U-Haul Site caused petroleum contamination at the U-Haul Site; (2) evaluate the likelihood that a petroleum release at the Garfield Express Site caused the petroleum contamination observed at the U-Haul Site; and (3) estimate the cost to clean up the contamination at both sites.

The scope of work consists of the following:

- Review background information for both sites;
- Review and evaluate water level data for both sites;
- Review and evaluate soil, soil gas, and groundwater chemistry data for the U-Haul Site;
- Review and evaluate separate phase hydrocarbon (SPH) data for both sites, including observed floating product measurements, Rapid Optical Screening Tool (ROST) data, and SPH product fingerprinting analyses;
- Develop cost estimates for cleanup of the contaminants at both sites; and
- Prepare opinions based on the above evaluations.

## 1.2 Approach

My approach for this analysis is to use the data described above to evaluate multiple lines of evidence to determine the most likely source of the contamination observed at the U-Haul Site and to determine the approximate cost to clean up both the Garfield Express and U-Haul Sites to levels acceptable to the California Regional Water Quality Control Board, Los Angeles Region (Water Board), such that groundwater monitoring alone would be required in the future.

## 1.3 Summary of Opinions

Opinion 1: A release, or releases, of gasoline from the use of an underground storage tank at the U-Haul Site is the primary source of soil and groundwater contamination at the U-Haul Site.

Opinion 2: Releases of gasoline at the Garfield Express Site are not the primary source of petroleum hydrocarbons at the U-Haul Site.

Opinion 3: The cost to clean up contaminants at both sites is estimated to be approximately \$2.2 million and the cost to clean up contaminants at the U-Haul Site alone is estimated to be approximately \$1.8 million.

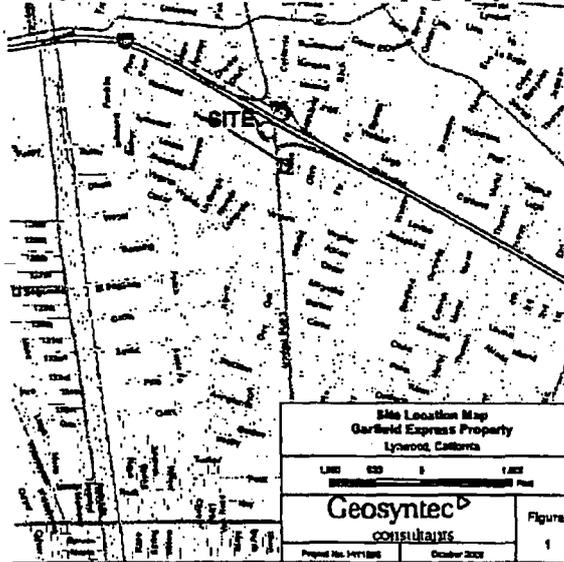
I also intend to use all or part of a previous Powerpoint presentation that I have given to further illustrate and support my opinions at trial.

## 2. BACKGROUND

The sites are located near the intersection of Lynwood Road and Long Beach Boulevard in Lynwood, California (Figure 1). Background information on the topography and hydrogeology of the area is presented in this section, along with operation and investigation history for the Garfield Express Site and the U-Haul Site.

### 2.1 Topography

The elevation of the area is approximately 82 to 85 feet above MSL, and it is located in the central portion of the Downey Plain on the Southern California Coastal Plain [USGS, 1963]. The local topography is relatively flat, sloping gently toward the south.



The Los Angeles River is located approximately 2 miles east of the area. The Los Angeles River flows toward the south, where it empties into the Pacific Ocean approximately 10 miles southwest of the area.

### 2.2 Geology and Hydrogeology

The information presented in this section is excerpted from the Site Conceptual Model Update [Brown and Caldwell, 2007] report, the Semi-Annual Groundwater Monitoring Report, Second Quarter 2007 [Blaes Environmental, 2007] and also based on California Department of Water Resources (DWR) Bulletin 104 Appendix A, dated June 1961 [DWR, 1961] and the United States Geological Survey (USGS) Water Resources Investigations Report 03-4065 [USGS, 2003].

The area is located in the Los Angeles Basin, in the northern portion of the Peninsular Geomorphic Province. This portion of the province is dominated by northwest-trending

geologic structures, including the Newport-Inglewood Structural Zone and the Wilmington Anticline. Faults associated with this structural zone are considered active.

The Los Angeles Basin is filled with sediments to a depth of 1,000 feet. These sediments consist of 150 feet of Recent Alluvium, underlain by 250 feet of the Upper Pleistocene Lakewood Formation and 600 feet of the Lower Pleistocene San Pedro Formation.

The major regional aquifers occur in these Recent and Pleistocene-age geologic formations. Pliocene sediments present at deeper depths are not considered to represent important water bearing units. The Gaspar Aquifer, in the recent Alluvium, is the shallowest regional aquifer and appears to be approximately 60 feet below ground surface (bgs) in this area based on regional data. The Exposition and Gardena Aquifers (Lakewood Formation) are approximately 150 and 330 feet bgs followed by the Jefferson, Lynwood and Silverado Aquifers (San Pedro Formation) at approximately 550, 625, and 735 feet bgs. The aquifers are generally separated by fine-grained aquitard units, including the Bellflower Aquiclude, which extends from the ground surface to a depth of 60 feet. Shallow groundwater in the area has ranged historically from 18 to 31 feet bgs in a sand unit within the Bellflower Aquiclude.

Figure 2 illustrates the soil layers that are present beneath both sites. Based on past investigations to a maximum depth of 60 feet below ground surface, soil consists predominantly of silt and silty sand to approximately 15 feet bgs. Below this interval, a lens of silty clay, clayey silt or clay extends laterally and ranges in thickness from approximately 5 to 15 feet. This silt/clay layer is underlain by a zone of silt, silty sand and sand, which extends to the depth of investigation at 60 feet bgs. This zone below the silt/clay layer generally corresponds to the first saturated flow zone.

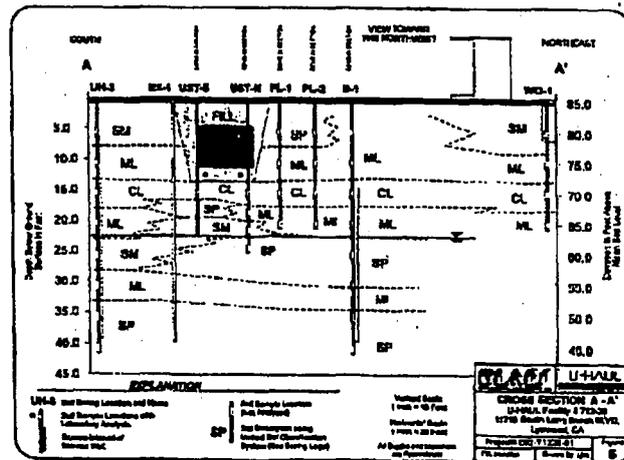


Figure 2. Source, Bises, 2001

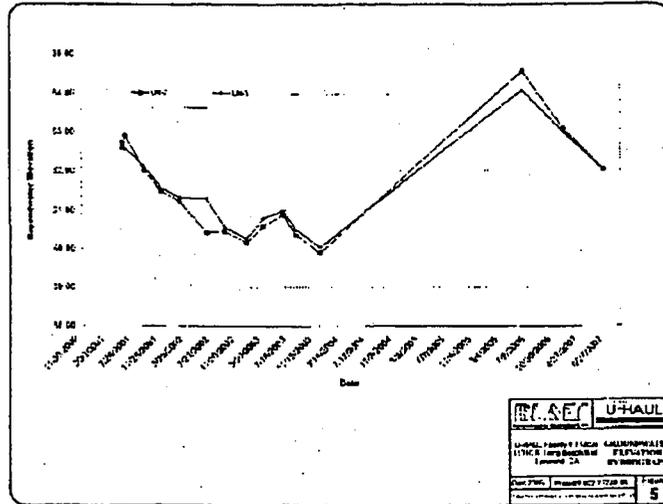


Figure 3. Source, Blaes, 2007

between 1997 and 2001, the depth to the first occurrence of groundwater was recorded below 25 feet bgs and reportedly later stabilized at approximately 19 to 22 feet bgs. Groundwater elevations have fluctuated from the low water levels measured between 2002 and 2004 to the higher water levels measured in late 2005, with the change in groundwater water elevations ranging from 4 to 7 feet (see Figure 3).

The first encountered groundwater coincides generally with the contact of the bottom of the clay and the top of the underlying sand at an approximate elevation of 60 feet above MSL. Based on the September 2008 water-level measurements, groundwater flow across the project area is generally toward the south-southeast; however, a significant groundwater low is present north of Louise Street in the vicinity of MW-33 and a significant groundwater high is present south of Louise Street in the vicinity of wells MW-24 and MW-28, which is consistent with historical monitoring events. Groundwater elevation contours for the September 2008 data are presented on Figure 4.

The saturated zone generally consists of sand and silty sand that is directly overlain by predominantly finer-grained sediments consisting mainly of silt/clay. The contact between the upper surface of the saturated zone and the overlying silt/clay appears to extend across both sites. At the time of the installations of many of the monitoring wells

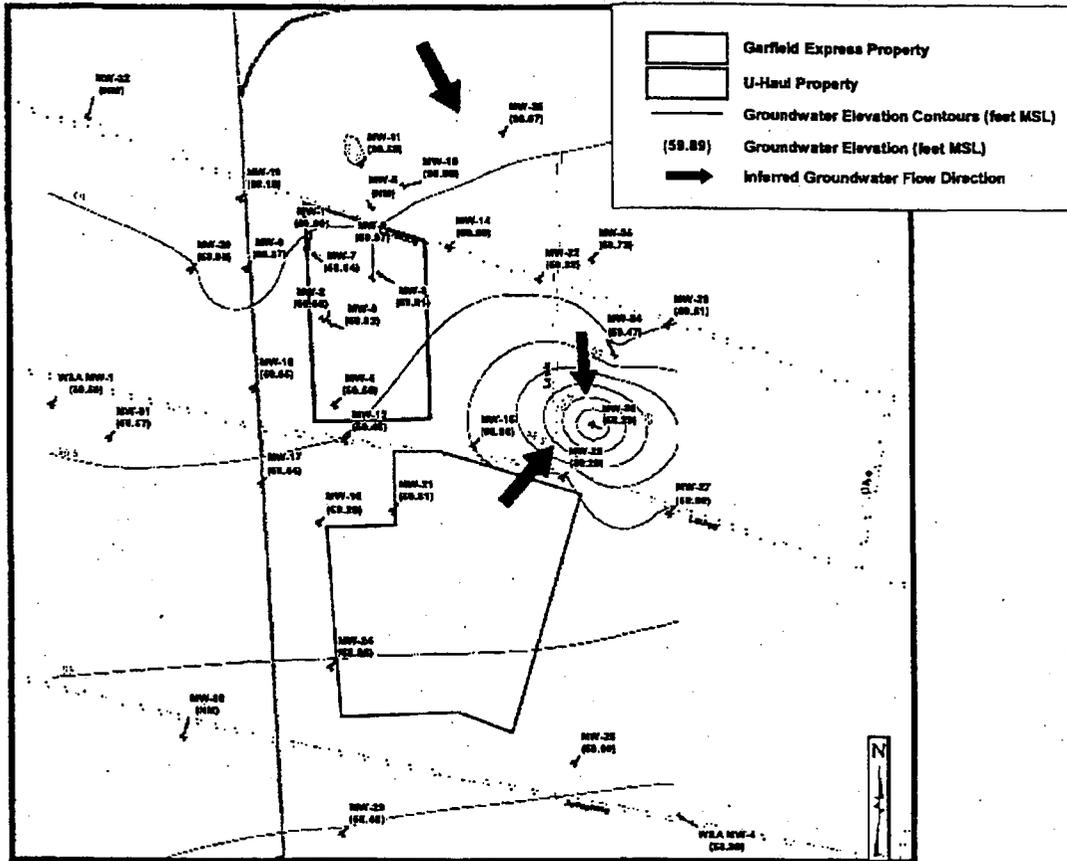


Figure 4. Groundwater Contour Map, Source, Geosyntec, 2008

## 2.3 History of Operations and Investigations

### 2.3.1 Garfield Express Site

The Garfield Express Site is located at the southeastern corner of the intersection of Lynwood Road and Long Beach Boulevard in Lynwood, California (Figure 1). An active gasoline service station occupies the northern portion of the Site. The remainder of the Site is occupied by several businesses, such as a coin laundromat, a pet shop, and a flower shop. The Site boundary, general Site layout, and locations of existing monitoring wells are presented in Figure 5.

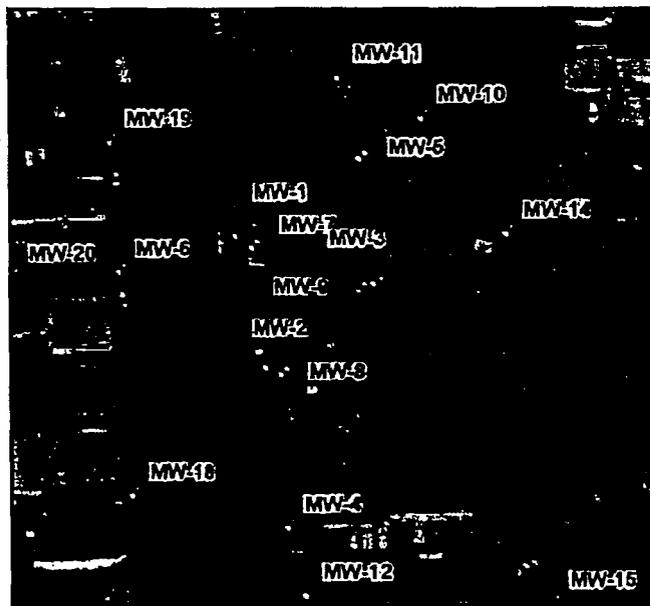


Figure 5. Source, Geosyntec, 2007

The Site Conceptual Model Update [Brown and Caldwell, 2007] provides an understanding of the history and environmental conditions at the Site. Louis and Alice Ross purchased the property in 1978. At that time, it was an active gasoline service station. A leaking underground storage tank (UST) was removed from service at the Site in 1995 and separate and dissolved phase gasoline products were discovered in groundwater during a subsequent investigation. The UST system was replaced at the Site in 1999. A brief summary of major tasks completed to date is as follows:

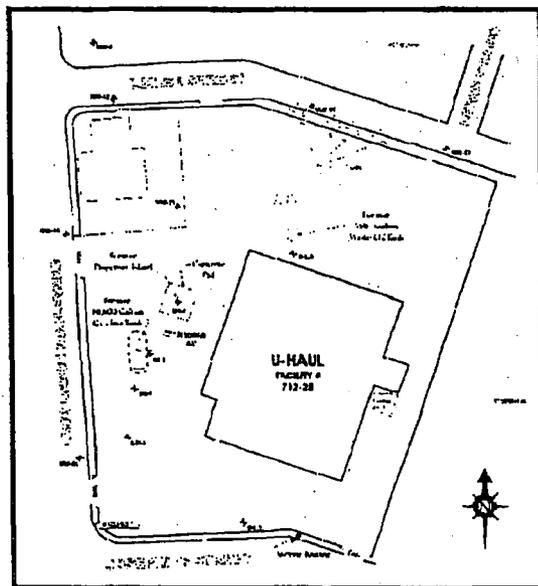
- Multiple assessments have been completed since 1995 to attempt to evaluate the extent of soil and groundwater impacts related to the UST release on the Site and to assess potential contributing off-Site sources;

- A total of 45 groundwater monitoring wells have been installed at the Site and vicinity, and groundwater monitoring has been conducted since 1998;
- Water Board Cleanup and Abatement Order (Order No. 2001-002) was issued for the Site in 2002 (File No. R-23001);
- A soil vapor extraction system was constructed and operated at the Site between June 2003 and June 2005; and
- SPH product recovery efforts were implemented in 1999 and are ongoing.

It should be noted that chlorinated solvents, primarily perchloroethene, have been detected in groundwater at the Garfield Express Site, possibly related to the historical operation of drycleaners at the Site. The source and extent of these compounds has not been fully determined. With respect to the detection of chlorinated solvents, I expect to offer opinions at trial in rebuttal to any opinions offered by any expert designated by U-Haul as to the cause of the presence of chlorinated solvents at the U-Haul Site.

### 2.3.2 U-Haul Site

U-Haul acquired the property located at 11716 Long Beach Boulevard in 1977. U-Haul



operated a vehicle and equipment rental and repair and self-storage business at the property. In 1977, U-Haul reported installing a 10,000-gallon, single-walled fiberglass UST at the site to store gasoline to fuel its rental vehicles. In 1979, U-Haul also reported installing a single-wall 550-gallon waste oil tank at the site to store waste generated from its vehicle maintenance operations (see Figure 6).

In 1986, U-Haul installed three monitoring wells around the tanks. Two of the wells (labeled EX-1 and EX-2) were located at the northeast

Figure 6. Source, Blaes, 2007

and southwest corners of the 10,000-gallon gasoline UST; the third well (labeled EX-3) was drilled adjacent to the 550-gallon waste oil tank. U-Haul has provided no monitoring records for these wells.

On December 12, 1988, the Los Angeles Department of Public Works (LADPW) cited U-Haul for failing to provide groundwater monitoring samples for its USTs as required by its HMMP for the tanks (see Attachment 1). On July 13, 1994, the LADPW sent U-Haul another Notice of Non-Compliance for failing to provide groundwater samples from the monitoring wells for its tanks (see Attachment 1). There is no evidence that U-Haul submitted the required groundwater monitoring data to the LADPW; however, U-Haul elected to remove its USTs in November 1996. In addition, U-Haul has not provided results of tank testing that would have been required for operation of the gasoline UST.

Upon removal of the tanks in 1996, U-Haul's consultant, Blaes Environmental, observed 10 holes in the bottom of the steel waste oil tank [Blaes, 1997]. While Blaes reported that the 10,000-gallon, fiberglass UST was in good condition, the data included with Blaes' report showed the soil beneath the UST was impacted by gasoline.

Following review of Blaes' report in 1997, the LADPW referred the Site to the Water Board, finding "there is soil contamination and potential threat to shallow to groundwater at the site," (see Attachment 1). Upon review of Blaes' report, the Water Board found the Site was impacted by gasoline constituents released from the U-Haul Site and that U-Haul's investigation was inadequate to define the lateral and vertical extent of the gasoline impact in the soil and groundwater caused by the release on its property (see Attachment 2). In 2000, the Water Board directed U-Haul to perform a detailed site investigation to define the extent of the impacts caused by the release on its property.

In May 2001, Blaes installed three additional monitoring wells (UH-1, UH-2, and UH-3, see Figure 6). Groundwater monitoring activities conducted at the Site since 2001 have consistently indicated SPH product in wells EX-1, EX-2, EX-3, and UH-1. SPH product has been observed at thicknesses of up to 10 feet in these wells.

**3. OPINION 1: A RELEASE, OR RELEASES, OF GASOLINE FROM THE USE OF AN UNDERGROUND STORAGE TANK AT THE U-HAUL SITE IS THE PRIMARY SOURCE OF THE SOIL AND GROUNDWATER CONTAMINATION AT THE U-HAUL SITE**

By evaluating multiple lines of evidence, I conclude that a release, or releases, of gasoline at the U-Haul Site has caused soil and groundwater contamination at the U-Haul Site and is the primary source of this contamination. These multiple lines of evidence are as follows

1. A single-walled, 10,000-gallon gasoline UST operated at the U-Haul Site for 20 years;
2. Three monitoring wells were installed in 1986; however, no monitoring records have been produced;
3. No certified tank test records have been provided;
4. Evidence of a petroleum release at the U-Haul Site was discovered in 1992; however, there is no evidence that this release was reported;
5. Evidence of a release was found when the gasoline UST was removed in 1996, which caused the Water Board to require further investigation;
6. Additional investigation in 2001 found 2,000 parts per million (ppm) gasoline in soil at a depth 2 feet below the bottom of the gasoline UST and floating gasoline in monitoring wells; and
7. Shallow soil gas investigation in 2002 indicates a "hot spot" near the gasoline UST with abrupt attenuation in all directions except to the northeast.

The first three lines of evidence were discussed in Section 2 of this report. Although U-Haul operated a gasoline fueling station for approximately 20 years at this location, it has not provided the monitoring well records or tank testing records that would have demonstrated whether the USTs were leaking or not. These records were required by the LADPW. A slow leak of gasoline from the 10,000-gallon UST for a number of years could explain the presence of floating SPH product under the UST.

The fourth line of evidence is based on information in documents obtained from U-Haul, but not submitted to the Water Board. In various reports and letters to regulatory

agencies, U-Haul's consultant, Blaes, has stated that there is no evidence of a significant release of gasoline from the 10,000-gallon gasoline UST; however, U-Haul has produced documents (Attachment 3) that show U-Haul discovered in 1992 that it had significant hydrocarbon contamination at the south part of its property in an area that appears to be about 100 feet from the location of the 10,000-gallon gasoline UST (indicated by the red box on Figure 7).

According to the documents, a consultant for a third party evaluating leasing or buying portions of the U-Haul Site obtained a TPH headspace reading with a "Geo-Probe" of 5,400 ppm at a sampling depth of 15 feet below grade and "observed significant discoloration/odor @ 15' below grade, continuing all the way down to 17.5' below grade." In addition, a sample location at the corner of Louis Street and Long Beach Blvd. did not contain evidence of petroleum hydrocarbons.

The discovery of significant hydrocarbon contamination near the area of the 10,000-gallon gasoline UST at the U-Haul Site in 1992, over three years before the release on the Garfield Express Site was discovered provides strong evidence that U-Haul already had gasoline releases on its property by 1992.

The fifth and sixth lines of evidence were identified based on data collected as part of the UST removals [Blaes, 1997]. Figure 8 represents a cross-section through the location of the former UST and excavation. At the time the USTs were removed in 1996, soil samples were collected from beneath the 10,000-gallon gasoline UST. These

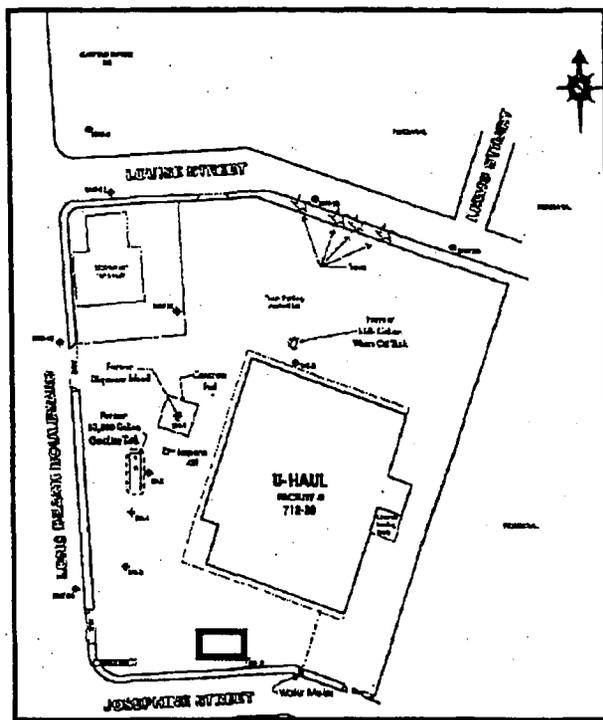


Figure 7. Source, Blaes, 2007 and Attachment 3

samples, known as T1-1 and T1-2, contained low levels of petroleum hydrocarbons. However, these samples were collected using a backhoe bucket, which can cause significant aeration of the soil and a resulting significant loss of petroleum in the soil samples. Following a request from the Water Board in 2000, Blaes drilled two borings for soil samples in the location of the former UST, known as UST-N and UST-S, in 2001. Blaes also tested the existing monitoring wells EX-1 and EX-2 and found 5 to 6 feet of floating SPH product in each one, as shown on Figure 8. The soil samples collected from directly beneath the former gasoline UST contained significant concentrations of gasoline, up to 2,000 ppm.

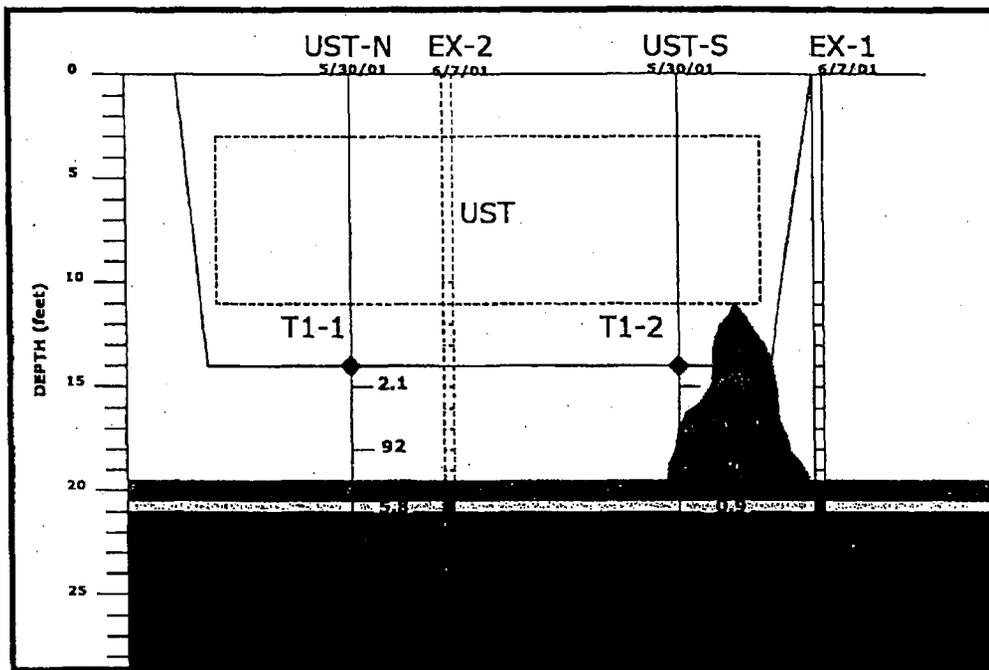


Figure 8. Cross-Section through Former 10,000-Gallon Gasoline UST Location

As Figure 8 illustrates, gasoline concentrations indicate a clear path of gasoline contamination present in 2001 beneath the south end of the former 10,000-gallon gasoline UST, culminating in over 5 feet of floating SPH product on the water table. To demonstrate how these ppm-levels of gasoline are evidence of the movement of gasoline vertically through the soil, culminating in the presence of the large amounts of

product observed floating on the groundwater, it is important to understand how separate phase gasoline behaves when it is released to the environment.

When gasoline leaks slowly from a UST into the soil, it displaces the air in the unsaturated soil pores as it moves downward by gravity until it hits the capillary fringe, where the soil is saturated with water, but the water is held in tension. When the gasoline hits the capillary fringe, because it is lighter than water, it floats and spreads out laterally, filling the soil pores as it spreads.

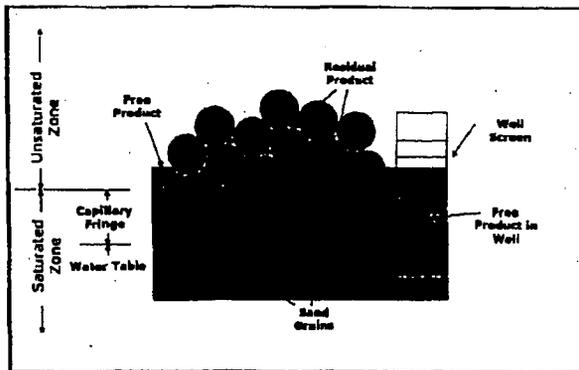


Figure 9. Basics of Floating Product Behavior

When the gasoline intercepts a monitoring well, it pours into the well, displacing the water and depressing the water within the well to levels lower than the water table outside the well.

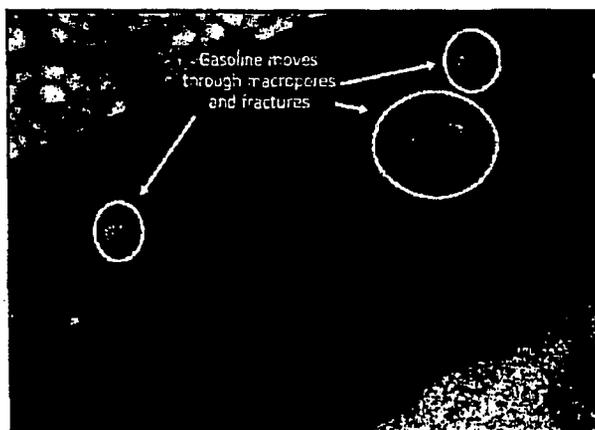


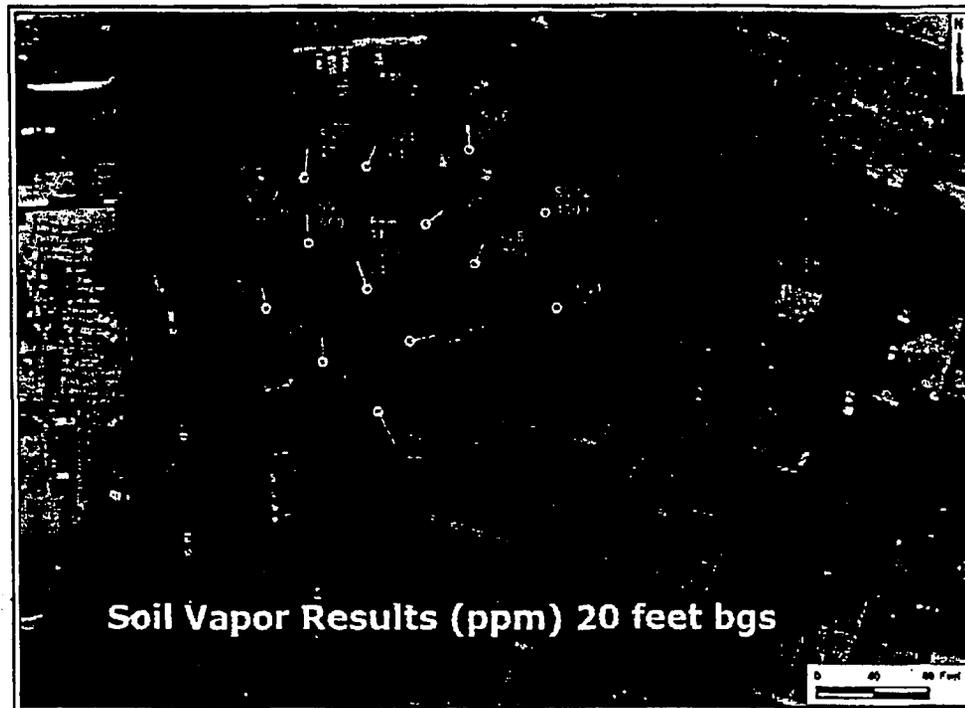
Figure 10. Source, RTDF, 2005

This behavior is illustrated in Figure 9. When the source of gasoline is cut off, e.g., when the tank is removed, the gasoline that remains held up in the unsaturated soil by tension is known as residual product.

The amount of residual product that can be held by soil is dependent on the soil type [RTDF, 2005]. In very fine-grained soils, such as the clayey soils that are present beneath the former 10,000-gallon gasoline UST, only very low concentrations are left behind when gasoline has moved through the soil and is left as residual. Figure 10 is a close-up view of gasoline as it moves through pores and fractures in clay soil. As the figure illustrates, only very low concentrations would be



levels were not found near the former gasoline UST, when in fact, they were found at that location, suggesting once again that the UST is a source of gasoline at the Site. When the data are re-contoured with the highest concentration included, as illustrated on Figure 13, a clearer pattern of gasoline distribution is apparent. The re-contoured



**Figure 13. Re-contoured Soil Gas Data**

data illustrate a "hot spot" near the former UST with concentrations attenuating in a northeast trending arc. This distribution is consistent with a release of gasoline in the UST area, with localized flow of the product toward the northeast.

**4. OPINION 2: RELEASES OF GASOLINE AT THE GARFIELD EXPRESS SITE ARE NOT THE PRIMARY SOURCE OF PETROLEUM HYDROCARBONS AT THE U-HAUL SITE**

By evaluating multiple lines of evidence, I conclude that releases of gasoline at the Garfield Express Site are not the primary source of petroleum hydrocarbons at the U-Haul Site. These multiple lines of evidence are as follows:

1. A bi-lobal distribution of SPH product is found at the two sites;
2. Two distinct SPH product signatures, one at the Garfield Express Site and one at the U-Haul Site, have been identified;
3. The groundwater flow direction at the U-Haul Site is toward the northeast, away from the gasoline UST location at U-Haul and toward Louise Street; and
4. The highest elevation of SPH product has been found on the U-Haul Site.

The first line of evidence is based on the distribution of residual SPH product as determined by the performance in 2006 of Rapid Optical Screening Tool (ROST) surveys at and between the Garfield Express Site and the U-Haul Site [Brown & Caldwell, 2007]. These surveys demonstrated that a bi-lobal distribution of SPH product exists, with one lobe emanating from the Garfield Express Site and the other emanating from the U-Haul Site. Figure 14 illustrates the results of the ROST surveys and demonstrates the two lobes of SPH product emanating from the two sites.

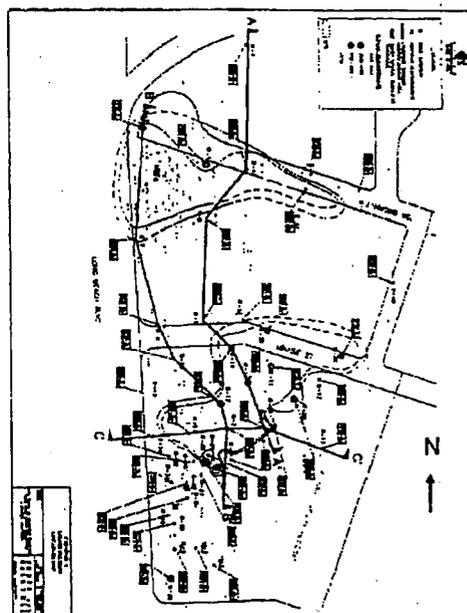


Figure 14. Bi-Lobal SPH Product Distribution, Source, B&C, 2006

The second line of evidence is based on the results of fingerprint analysis of the samples of floating SPH product found in monitoring wells at the Garfield Express Site, the U-Haul Site, and along Louise Street, which runs east-west between the two sites. The fingerprint analyses were conducted by Zymax Laboratories in 2006. The Zymax analytical report is attached (Attachment 4). Figure 15 summarizes a portion of the results of the report in graphical form.

The results of the evaluation of ratios of four indicator chemicals in each of the two products suggest

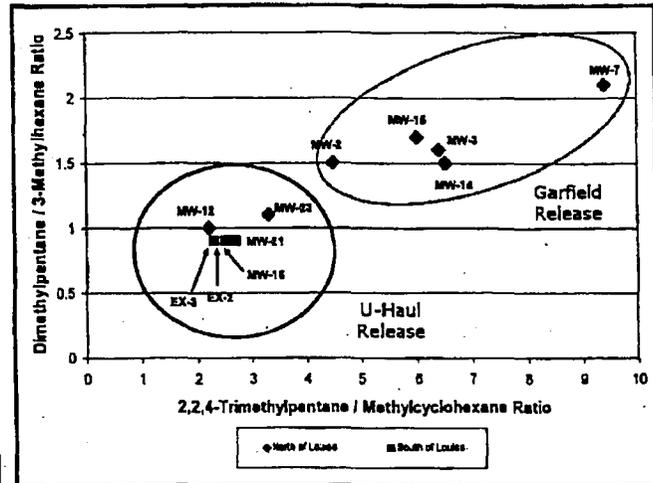


Figure 15. Two Sources of Floating SPH Product, Source, Zymax, 2006

two sources of the SPH product, one centered around the Garfield Express Site and one centered around the U-Haul Site. In addition, the distributions of gasoline additives, such as the oxygenates MTBE, DIPE, and TAME, indicate two separate sources of the product, with one well demonstrating anomalous results. These results are illustrated on Figure 16.

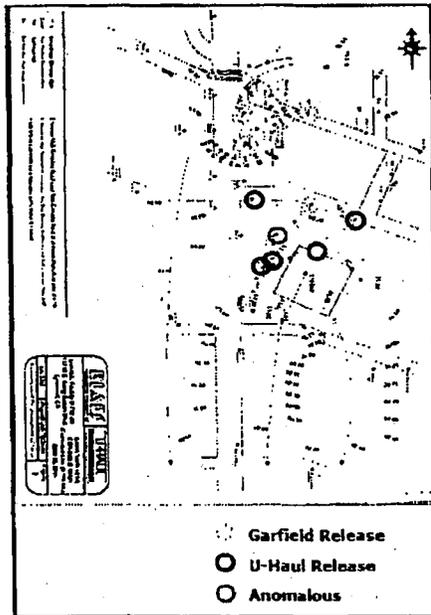


Figure 16. Two Sources of Floating SPH Product, Source, Zymax, 2006

The third line of evidence is the observed northeasterly groundwater flow direction at the U-Haul Site. As discussed in Section 2 and illustrated on Figure 4, this northeasterly flow direction is evidenced by a groundwater low that exists to the northeast of the U-Haul Site. The low spot in the water table causes the

groundwater surface to slope toward the northeast, which in turn causes gasoline floating on the water table to flow toward the northeast.

This low spot has also been observed by Blaes and reported in historical monitoring reports. Figure 17 is a groundwater contour map prepared by Blaes in 2006. The map again illustrates that groundwater at the U-Haul Site flows from a high at the area of the former 10,000-gallon gasoline UST toward the northeast. Groundwater at the Garfield Express Site flows to the southeast. These two flow directions cause the SPH product emanating from each of the sites to flow toward Louise Street where commingling of the products occurs.

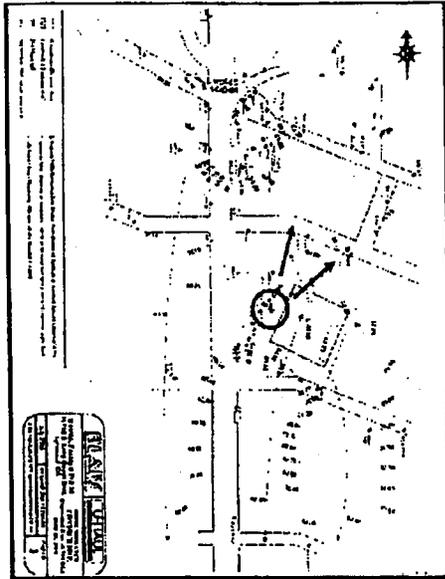


Figure 17. Localized Groundwater Highs.  
Source, Blaes, 2006

floating SPH product at the U-Haul Site in 2002, at a time when observations of product were made in all wells. The highest product elevation was measured at well UH-1, located on the U-Haul Site. Product elevations drop off toward Louise Street to the north, consistent with a separate product release near U-Haul's former 10,000-gallon gasoline UST.

Consistent with the groundwater flow pattern, the highest elevations of floating gasoline are also found in the area of the former U-Haul 10,000-gallon gasoline UST. Figure 18 illustrates the distribution of

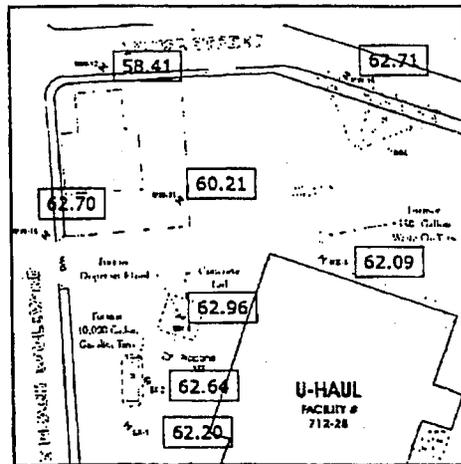


Figure 18. Top of Floating Product Elevations.  
Source, Blaes, 2007 and B&C, 2006

**5. OPINION 3: THE COST TO CLEAN UP CONTAMINANTS AT BOTH SITES IS ESTIMATED TO BE APPROXIMATELY \$2.2 MILLION AND THE COST TO CLEAN UP CONTAMINANTS AT THE U-HAUL SITE ALONE IS ESTIMATED TO BE APPROXIMATELY \$1.8 MILLION**

The future cost to clean up soil and groundwater at the both the Garfield Express and U-Haul Sites to levels acceptable to the Water Board, such that groundwater monitoring alone would be required in the future, were estimated by Geosyntec engineers. The cleanup technology selected by Geosyntec is multi-phase extraction. With this technology, contaminants are removed using a strong vacuum applied to all phases of the contaminant, including the product that floats on the water table, the residual product that is trapped in the soil pores, the gaseous product phase that is present in soil pores, and the dissolved product phase that is present in solution in groundwater. All of these phases are extracted from the ground and treated via an above-ground treatment plant prior to discharge.

For cleanup of both sites, the multi-phase remedy includes the installation of approximately 30 extraction wells, 16 at the U-Haul Site and 14 at the Garfield Express Site. Each well has a design radius of influence of approximately 33 feet. The area requiring remediation at the U-Haul Site is estimated to be approximately 60,000 square feet and the area requiring remediation at the Garfield Site is estimated to be approximately 44,000 square feet. The remedy also includes installation of a vacuum blower and treatment system designed to operate for a period of three years. The treatment system includes an oil/water separator for removing SPH product, an oxidizer for treating extracted soil vapor, and granular activated carbon for treating dissolved phase contaminants in groundwater. The cost estimate for cleanup at both sites, which totals approximately \$2.2 million, is detailed in Table 1.

To estimate the cleanup cost for the U-Haul Site alone, the areal extent of treatment was reduced from 104,000 square feet to 60,000 square feet. The resultant cleanup estimate is approximately \$1.8 million, detailed in Table 2.

TABLE 1. Conceptual Design Cost Estimate - Both Sites

TASK	Units	Unit Price (\$)	Multiphase Extraction		Comments
			Number	Cost	
<b>PROJECT INFORMATION</b>					
Treatment Area	ft <sup>2</sup>	—	104000		Figure 9 (Conceptual Model Report)
Treatment Depth	ft	—	30		Screen in Screen Zone (17'-27' bgs)
Extraction Well Radius of Influence	ft	—	33.0		Past Project Experience
Groundwater Production	gpm/well	—	0.25		Engineering Estimate
NAPL Production	% water	—	0.10%		Past Project Experience
MPE/SVE Wells (4' PVC)	Ea	—	30		Calculated based on Area and ROI
MPE/SVE Well Flow	scfm/well	—	20		Past Project Experience (MPE @ 20 in Hig)
Percentage of wells in Operation	%	—	100%		Estimate
MPE/SVE TOTAL Flow	scfm	—	600		Calculated based on #of wells, flow, Operating %
<b>WORK PLAN DEVELOPMENT</b>					
Labor	\$/hr	120	200	\$33,600	Engineering Estimate
Travel and ODCs	\$/day	250	2	\$500	Engineering Estimate
<b>PILOT TEST</b>					
Labor	\$/hr	120	160	\$19,200	Engineering Estimate
Well Installation	\$/well	2,500	6	\$15,000	Engineering Estimate
Sampling and Analysis	LS	5,000	1	\$5,000	Engineering Estimate
Equipment and Supplies	LS	20,000	1	\$20,000	Engineering Estimate
<b>SYSTEM IMPLEMENTATION</b>					
<b>Well Installation</b>					
Utility Locate/GPR	LS	10,000	1	\$10,000	Engineering Estimate
MPE/SVE Wells (4' PVC)	\$/ft	75	900	\$67,500	Calculated (# of wells, depth)
Well Install Labor	\$/day	750	10	\$7,500	Engineering Estimate (3 MPE wells per day)
<b>Trenching, Piping, and Wellheads</b>					
Trench Excavation/Backfill	\$/ft	20	1,500	\$30,000	Means, Page: 533, 545
Asphalt/Concrete Repair	\$/ft <sup>2</sup>	10	3,000	\$30,000	Past Vendor Quote (ETS)
Piping (4" Sch 80 PVC, 90' per well)	\$/ft	7.0	1,500	\$10,500	Means, Page: 588
Fittings (% of piping)	LS	50%	10,500	\$5,250	Engineering Estimate
Gauge & Valve Package	\$/well	200	30	\$6,000	Past Project Experience
Wellhead/Manifold/Valve Box Construct	\$/well	500	30	\$15,000	Past Project Experience
<b>Process Equipment</b>					
MPE Skid	Ea	112,000	1	\$112,000	H2 Oil Quote
Oil/Water Separator	Ea	10,000	1	\$10,000	Past Vendor Quote (H2 Oil)
LNAPL Storage Tank and Controls	Ea	5,000	1	\$5,000	Past Vendor Quote (H2 Oil)
Oxidizer	Ea	87,000	1	\$87,000	Past Vendor Quote (H2 Oil)
LGAC Vessels	Ea	5,000	2	\$10,000	Past Vendor Quote (H2 Oil)
<b>Subcontractor Installation</b>					
Electrical Connection	LS	15,000	1	\$15,000	Engineering Estimate
Equipment Installation	LS	25,000	1	\$25,000	Engineering Estimate
Equipment Pad and Enclosure	LS	30,000	1	\$30,000	Engineering Estimate
Electrical Controls	LS	25,000	1	\$25,000	Engineering Estimate
Misc. Site Civil Work (% of equipment)	LS	15%	234,000	\$33,600	Engineering Estimate
Mod./Assemb./shipping (% of equipment)	LS	10%	224,000	\$22,400	Engineering Estimate
<b>COMPLETION REPORT</b>					
Labor	\$/hr	120	240	\$28,800	Engineering Estimate
Travel and ODCs	\$/day	250	2	\$500	Engineering Estimate
<b>ENGINEERING COSTS &amp; FEES</b>					
System Design/Permit (% of Imp Cost)	LS	10%	556,750	\$55,675	Engineering Estimate
Procure/Contract (% of Imp Costs)	LS	5%	556,750	\$27,838	Engineering Estimate
Construction Oversight	\$/hr	120	300	\$36,000	Engineering Estimate
O&M Manual	LS	15,000	1	\$15,000	Engineering Estimate
System Startup and Testing	\$/day	2,500	10	\$25,000	Engineering Estimate
ODC Markup (% of Imp Costs)	LS	10%	556,750	\$55,675	Standard Fee for similar projects
Taxes (% of Imp Costs)	LS	8.25%	556,750	\$45,932	Lynnwood Sales Tax
Contingency (% of Total Costs)	LS	20%	\$40,469	\$188,094	Conceptual Design Estimate

TABLE 1. Conceptual Design Cost Estimate - Both Sites

TASK	Units	Unit Price (\$)	Multiphase Extraction		Comments
<b>OPERATION AND MAINTENANCE</b>					
Operation Labor (hours per year)	\$/hr	100	832	\$83,200	MPE: 16 hrs per week. AS/SVE: 20 hrs per week
Materials and Supplies	\$/month	Varies	500	\$6,000	Engineering Estimate
Electricity	\$/yr/hp	784	125	\$97,965	\$0.12/kW-hr (MPE: 3 acfm/hp)
Natural Gas	\$/month/cfm	3.25	7,200	\$23,400	H2 O&M Cal Sheet (\$1.5/therm)
Liquid GAC	\$/lb/year	4	5,000	\$20,000	500 lbs TPH @ 0.1 lb/lb adsorption
Groundwater Disposal Cost	\$/ M&M gal	2,422	3.9	\$9,548	County Sanitation District of LA County
NAPL Disposal Cost	\$/gal	1.73	3,942	\$6,809	Emerald Services (\$95/drum)
Water Sampling (Labor and Analysis)	\$/well	400	56	\$22,400	1 well sample per yr. 3 system per month
Vapor Sampling (Labor and Analysis)	\$/point	200	96	\$19,200	2 well samples per yr. 3 system per month
Sampling Equipment	\$/year	2,500	1	\$2,500	Engineering Estimate
Project Management (% of O&M)	LS	10%	291,021	\$29,102	Engineering Estimate
ODC Markup (% of O&M ODCs)	LS	10%	207,821	\$20,782	Standard Fee for similar projects
Contingency (% of Total O&M Costs)	LS	20%	340,906	\$68,181	Standard Fee for similar projects
Total Estimated Capital Costs				\$1,128,543	
Total Estimated O&M Costs				\$689,887	
Estimate Years of O&M				3.0	
<b>NET PRESENT VALUE</b>			6% Interest	\$2,321,006	

TABLE 2. Conceptual Design Cost Estimate - U-Haul Site Only

TASK	Units	Unit Price (\$)	Multiphase Extraction		Comments
			Number	Cost	
<b>PROJECT INFORMATION</b>					
Treatment Area	ft2	---	60000		Figure 9 (Conceptual Model Report)
Treatment Depth	R	---	30		Screen in Smear Zone (17'-27' bgs)
Extraction Well Radius of Influence	R	---	33.0		Past Project Experience
Groundwater Production	gpm/well	---	0.25		Engineering Estimate
NAPL Production	% water	---	0.10%		Past Project Experience
MPE/SVE Wells (4" PVC)	Ea	---	16		Calculated based on Area and ECI
MPE/SVE Well Flow	acfm/well	---	20		Past Project Experience (MPE @ 20 in Hg)
Percentage of wells in Operation	%	---	100%		Estimate
MPE/SVE TOTAL Flow	acfm	---	320		Calculated based on #of wells, flow, Operating %
<b>WORK PLAN DEVELOPMENT</b>					
Labor	S/hr	120	280	\$33,600	Engineering Estimate
Travel and ODCs	S/day	350	2	\$300	Engineering Estimate
<b>PILOT TEST</b>					
Labor	S/hr	120	160	\$19,200	Engineering Estimate
Well Installation	S/well	2,500	6	\$15,000	Engineering Estimate
Sampling and Analysis	LS	5,000	1	\$5,000	Engineering Estimate
Equipment and Supplies	LS	20,000	1	\$20,000	Engineering Estimate
<b>SYSTEM IMPLEMENTATION</b>					
<b>Well Installation</b>					
Utility Locals/GPR	LS	10,000	1	\$10,000	Engineering Estimate
MPE/SVE Wells (4" PVC)	S/ft	75	480	\$36,000	Calculated (# of wells, depth)
Well Install Labor	S/day	750	5	\$4,000	Engineering Estimate (3 MPE wells per day)
<b>Trenching, Piping, and Wellheads</b>					
Trench Excavation/Backfill	S/ft	20	800	\$16,000	Means, Pages: 533, 545
Asphalt/Concrete Repair	S/ft <sup>2</sup>	10	1,600	\$16,000	Past Vendor Quote (ETS)
Piping (4" Sch 80 PVC, 50' per well)	S/ft	7.0	800	\$5,600	Means, Page: 588
Fittings (% of piping)	LS	50%	3,600	\$2,800	Engineering Estimate
Gauge & Valve Package	S/well	300	16	\$4,800	Past Project Experience
Wellhead/Manifold/Valve Box Construct	S/well	300	16	\$4,800	Past Project Experience
<b>Process Equipment</b>					
MPE Skid	Ea	112,000	1	\$112,000	H2 Oil Quote
Oil/Water Separator	Ea	10,000	1	\$10,000	Past Vendor Quote (H2 Oil)
LNAPL Storage Tank and Controls	Ea	5,000	1	\$5,000	Past Vendor Quote (H2 Oil)
Oxidizer	Ea	87,000	1	\$87,000	Past Vendor Quote (H2 Oil)
LGAC Vessels	Ea	5,000	2	\$10,000	Past Vendor Quote (H2 Oil)
<b>Subcontractor Installation</b>					
Electrical Connection	LS	15,000	1	\$15,000	Engineering Estimate
Equipment Installation	LS	25,000	1	\$25,000	Engineering Estimate
Equipment Pad and Enclosure	LS	30,000	1	\$30,000	Engineering Estimate
Electrical Controls	LS	25,000	1	\$25,000	Engineering Estimate
Misc. Site Civil Work (% of equipment)	LS	15%	224,000	\$33,600	Engineering Estimate
Job/demob/shipping (% of equipment)	LS	10%	224,000	\$22,400	Engineering Estimate
<b>COMPLETION REPORT</b>					
Labor	S/hr	120	240	\$28,800	Engineering Estimate
Travel and ODCs	S/day	250	2	\$500	Engineering Estimate
<b>ENGINEERING COSTS &amp; FEES</b>					
System Design/Permit (% of Imp Cost)	LS	10%	476,600	\$47,660	Engineering Estimate
Procure/Contract (% of Imp Costs)	LS	5%	476,600	\$23,830	Engineering Estimate
Construction Oversight	S/hr	120	300	\$36,000	Engineering Estimate
O&M Manual	LS	15,000	1	\$15,000	Engineering Estimate
System Startup and Testing	S/day	2,500	10	\$25,000	Engineering Estimate
ODC Markup (% of Imp Costs)	LS	10%	476,600	\$47,660	Standard Fee for similar projects
Taxes (% of Imp Costs)	LS	8.25%	476,600	\$39,320	Lynnwood Sales Tax
Contingency (% of Total Costs)	LS	20%	833,670	\$166,734	Conceptual Design Estimate

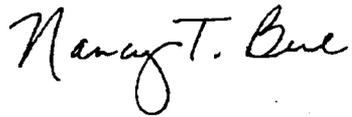
TABLE 2. Conceptual Design Cost Estimate - U-Haul Site Only

TASK	Units	Unit Price (\$)	Multiphase Extraction		Comments
<b>OPERATION AND MAINTENANCE</b>					
Operation Labor (hours per year)	\$/hr	100	832	\$83,200	MPE: 16 hrs per week
Materials and Supplies	\$/month	Varies	500	\$6,000	Engineering Estimate
Electricity	\$/yr/hp	784	69	\$54,077	60.12/kW-hr (MPE: 5 acfm/hp)
Natural Gas	\$/mon/cfm	3.25	3,840	\$12,480	H2 O&M Cost Sheet (\$1.3/therm)
Liquid GAC	\$/lb/year	3	3,000	\$15,000	500 lbs TPH @ 0.1 lb/lb adsorption
Groundwater Disposal Cost	\$/MM gal	2,822	2.1	\$5,092	County Sanitation District of LA County
NAPL Disposal Cost	\$/gal	1.73	2,102	\$3,631	Emerald Services (\$95/drum)
Water Sampling (Labor and Analysis)	\$/well	400	36	\$22,400	1 well sample per yr, 3 systems per month
Vapor Sampling (Labor and Analysis)	\$/point	200	68	\$13,600	2 well samples per yr, 3 systems per month
Sampling Equipment	\$/year	2,500	1	\$2,500	Engineering Estimate
Project Management (% of O&M)	LS	10%	217,980	\$21,798	Engineering Estimate
ODC Markup (% of O&M ODCs)	LS	10%	134,780	\$13,478	Standard Fee for similar projects
Contingency (% of Total O&M Costs)	LS	20%	233,256	\$30,651	Standard Fee for similar projects
Total Estimated Capital Costs				\$1,000,403	
Total Estimated O&M Costs				\$303,907	
Estimate Years of O&M				3.0	
NET PRESENT VALUE			6% Interest	\$1,613,000	

**6. LITIGATION RATES AND RECENT TESTIMONY**

My hourly rate is \$225. I have not testified as an expert in deposition or in court in the last four years. A copy of my current curriculum vitae is presented in Attachment 5.

Respectfully submitted,

A handwritten signature in cursive script that reads "Nancy T. Bice".

Nancy T. Bice, P.G., C.E.G.  
Principal Engineering Geologist

**Geosyntec Consultants**

**ATTACHMENT 1**  
**LADPW Letters**



COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1200  
Telephone: (818) 488-2100

TOMAS A. TIDEMANSON, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1400  
ALHAMBRA, CALIFORNIA 91803-1400

December 12, 1988

IN REPLY PLEASE  
REFER TO FILE  
I-12239-26

Lynwood Moving Center  
11716 Long Beach Blvd.  
Lynwood, CA 90262

Gentlemen:

HAZARDOUS MATERIALS UNDERGROUND STORAGE PROGRAM (HMUSP)  
LEAK DETECTION PROGRAM/TANK MONITORING PROGRAM (LDP/TMP)  
HMUSP NO. 7855  
FACILITY AT: 11716 Long Beach Blvd

This office reviewed the LDP/TMP proposal submitted on March 22, 1988  
for the subject facility.

In order to comply with the County's minimum LDP/TMP requirements, the information indicated on the attached Additional LDP/TMP Requirements sheet must be submitted to this office by January 12, 1989.

If you have any questions regarding this matter, please contact  
Mr. Ofori Amoah at (818) 3560.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works

By [Signature]  
Waste Management Division

Enc.

cc: Jirsa Environmental Services

LD302 3/88

FILE # 1-12239-26  
HWLSP # 3855LOS ANGELES COUNTY  
DEPARTMENT OF PUBLIC WORKS  
ADDITIONAL LDP/TMP REQUIREMENTS

The additional information or requirements checked below must be submitted to the Los Angeles County Department of Public Works, Waste Management Division, P.O. Box 1460, Alhambra, CA 91802-1460, in order to complete evaluation of the LDP/TMP proposal.

- 1. Plot plan to scale showing locations of tanks and associated piping, boring and monitoring well locations, buildings, adjacent streets, and north arrow.
- 2. Information pertaining to the tanks contradicts information previously submitted on the permit application form or hazardous substance storage statements. These contradictions must be corrected.
- 3. Number and location of soil and/or groundwater samples is not adequate.
- 4. Proposed sampling protocol.
- 5. Proposed sample analysis method(s).
- 6. Boring logs certified by a California registered geologist, California registered civil engineer with sufficient experience in soils, or a California certified engineering geologist.
- 7. Type of monitoring proposed is not appropriate for tank(s) number \_\_\_\_\_.
- 8. Documentation as to depth of groundwater at facility.
- 9. Monitoring well specifications and cross section showing well construction.
- 10. Monitoring well specifications do not conform to Los Angeles County guidelines for the groundwater condition.
- 11. Manufacturer and model number of monitoring sensor or device(s).
- 12. Manufacturer and model number of pressure line monitoring system.
- 13. Manufacturer and model number of overflow protection device.
- 14. Tank integrity test results and data sheets.
- 15. Manufacturer and model number of Tank Level Monitor (TLH) system.
- 16. Pressurized pipelines must be shown on the plot plan.
- 17. Monitoring for pressurized pipelines is required.  
*Groundwater samples were required after its encroachment.*
- 18. Other: *Contact the California Regional Water Quality Control Board (CRWQCB) for sampling procedures and other parameters needed for the analysis. Use EPA 502.*



THOMAS A. TIDEMANSON, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

100 SOUTH FLEMING AVENUE  
ALHAMBRA, CALIFORNIA 91801-1111  
Telephone: (818) 433-3100

CALIFORNIA

RECEIVED

July 13, 1994

Mr. Ray Parck  
U-Haul Corp of Los Angeles-West  
964 South La Brea  
Inglewood, CA 90301-1215

Post-It Fax Note	7571	Date	2/2/94	Page	1
To	Ray Parck	From	Michael Long		
City/Dept	Los Angeles	CA	1 PRW/CB		
Phone		Phone			
Fax	213-728-0768	Fax			

### NOTICE OF NON-COMPLIANCE HAZARDOUS MATERIALS UNDERGROUND STORAGE PERMIT (HMUSP) FACILITY LOCATION: 11716 LONG BEACH BOULEVARD, LYNWOOD

You were notified on December 12, 1988 to submit to this office on or before January 13, 1989 the item(s) checked below:

- HMUSP application and/or accompanying fees.
  - Tank integrity test results for the underground containers at the above location.
  - Leak Detection Program (LDP).  Tank Monitoring Program (TMP).
  - LDP/TMP corrections.  LDP/TMP final report.
  - Assessment report following closure of the following containers:
- 
- Site investigation proposal.  Remedial action plan.
  - Progress report for the month of \_\_\_\_\_.
  - Other Additional LDP/TMP requirements: Groundwater samples were required after its encroachment.

As of this date, our records show that you have not responded. Please be advised that the required information must be submitted to this office by Sept 13, 1994. Failure to comply with this notice will result in the initiation of enforcement measures.

If you have any questions, please contact Mr. Jose Pelayo of this office, at (818) 458-3516, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Acting Director of Public Works

By [Signature]  
Waste Management Division



**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

800 SOUTH FRENCH AVENUE  
ALHAMBRA, CALIFORNIA 91805-1001  
Telephone (626) 491-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 149  
ALHAMBRA, CALIFORNIA 91804-149

October 31, 2000

IN REPLY PLEASE REFER TO FILE  
EP-1  
012132-012239

Mr. Dave Bacharowski  
State of California Regional Water  
Quality Control Board  
320 W. 4<sup>th</sup> Street, Ste. 200  
Los Angeles, CA 90013-1104

Dear Mr. Bacharowski:

**HAZARDOUS MATERIALS UNDERGROUND STORAGE  
CLOSURE REPORT  
CLOSURE APPLICATION NUMBER: 175350  
FACILITY LOCATION: 11716 LONG BEACH BL., LYNWOOD**

This office has reviewed the closure report dated January 21, 1997 and the file records for the subject site. Based on the report and previous records, there is soil contamination and potential threat to shallow groundwater at the site.

Pursuant to Section 25207 (b) of the California Health and Safety Code, we are referring this matter to your agency for further action. We request that all the future correspondences regarding this matter, be sent to your office with a copy sent to this office.

If you have any questions concerning this matter, please contact Ms. Rani Iyer of this office at (626) 458-3560, Monday through Thursday, 7:00 a.m. to 5:30 p.m.

Very truly yours,

HARRY W. STONE  
Director of Public Works

SUBODH SINHA  
Supervising Civil Engineer I  
Environmental Programs Division

R:nh  
ADMBACH 48  
C081283

cc: U-Haul International (Ben Johnson)  
Blaes Environmental Management, Inc. (Stephen Brinigar)  
CRWQCB (Michael Yang)

**Geosyntec Consultants**

**ATTACHMENT 2  
Water Board Letter**



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



Winston H. Hickox  
Secretary for  
Environmental  
Protection

328 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6700  
Internet Address: <http://www.swrcb.ca.gov/~cwqcb/>

Gray Davis  
Governor

December 12, 2000

Mr. Ben Johnson  
U-Haul International  
2721 North Central Avenue, Suite 700  
Phoenix, Arizona 85004

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
CLAIM NO. Z 237 177 138

**UNDERGROUND TANKS PROGRAM – SITE INVESTIGATION**  
**U-HAUL/LYNWOOD MOVING CENTER**  
**11716 LONG BEACH BOULEVARD, LYNWOOD (CASE NO. R-11239)**

Dear Mr. Johnson,

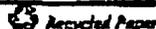
The California Regional Water Quality Control Board, Los Angeles Region, is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within Los Angeles and Ventura counties. As such, we are the lead regulatory agency for overseeing corrective action (assessment and/or monitoring activities) and cleanup of releases from leaking underground storage tank systems at the subject site. This case was referred to us by the County of Los Angeles Department of Public Works on November 2, 2000.

**1. Site Assessment Report**

We have reviewed the "Underground Storage Tank Removal Report," dated January 21, 1997, for the subject site. Based on our review of the data, the soil beneath the site was impacted by gasoline constituents including methyl tertiary butyl ether (MTBE) and the depth to groundwater is reported to be approximately 25-35 feet below grade. The lateral and vertical extent of the gasoline impact has not been fully defined in the soil and groundwater; therefore, you are required to submit a workplan to meet the following conditions.

1. Groundwater monitoring wells are required to assess the groundwater and to define the contamination plume beneath the site. The construction and development of groundwater monitoring wells must comply with the requirements prescribed in California Code of Regulations (CCRs), Title 23, Division 3, Chapter 16, Section 2649 (copy attached). Please submit a scaled map showing proposed locations in your workplan.
2. Your workplan must conform to Title 23, California Code of Regulations, Division 3, Chapter 16, Underground Storage Tank Regulations.
3. Soil samples must be collected at five-foot intervals in all soil borings for geologic logging and chemical analysis. All soil samples collected must be field screened for petroleum hydrocarbon using either a PID or FID for ambient air monitoring. All soil samples must be prepared per EPA Method 5035.

*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.*

4. All soil and groundwater samples must be analyzed by EPA Method 8015 for TPH-G (gasoline), and EPA Method 8260B for BTEX, methyl tertiary butyl ether (MTBE), di-isopropyl ether (DIPE), ethyl tertiary butyl ether (ETBE), tertiary amyl methyl ether (TAME), and tertiary butyl alcohol (TBA). In addition, all other constituents detected between method detection limits (MDL) and the estimated quantifiable limits (EQL) must be reported (see the attached laboratory requirements dated 6/22/2000).
5. Following the initial groundwater monitoring well results, a quarterly monitoring and sampling program must continue for all wells and test results for the constituents listed in item #4 must be submitted by the fifteenth day following the end of each quarter as shown in the following schedule.

<u>Reporting Period</u>	<u>Report Due Date</u>
January - March	April 15
April - June	July 15
July - September	October 15
October - December	January 15

6. Prior to collecting groundwater samples, free product thickness (if present) must be determined and the water must be measured in all wells to be sampled, then the wells are to be properly purged until the temperature, conductivity, and pH stabilize, and the water is free of suspended and settleable matter, before samples are collected for analysis.
7. All groundwater monitoring wells must be surveyed to a benchmark for known elevation above mean sea level by a licensed land surveyor or registered civil engineer.
8. All reports submitted to this office must conform to the "Guideline for Report Submittal" (June 1993), published by the Los Angeles County Department of Public Works (copy enclosed). Please report all groundwater data in micrograms per liter ( $\mu\text{g/l}$ ). All analytical data must be reported by a California certified laboratory.
9. All work and technical reports must be performed by or under the direction of the registered geologists, certified engineering-geologists, or registered civil engineers. A statement is required in the report that the registered professionals in direct responsible charge actually supervised or personally conducted all the work associated with the project. All technical submittals must contain a wet ink signature and seal by one of the registered professionals.
10. A site specific Health and Safety Plan must be submitted with your workplan.
11. You must submit a scaled map showing the locations and identification of all production wells and water bodies within one-mile radius of the site. Please indicate well owner, identification number, depth to groundwater, well type, screen interval, and distance from site.

**California Environmental Protection Agency**



## II. Information Requirements

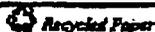
To help facilitate our review, we would appreciate that you provide the following information regarding the former tanks located on the property:

1. Facility contact person's name and telephone number.
2. Facility mailing address.
3. Tank removal and/or repair information, include tank size, contents, and gallons.
4. Tank disposal documentation.
5. Copies of all previous site assessment and/or remediation report(s), if any.
6. All previous soil and groundwater sample analytical results.
7. Submit the depth to drinking water aquifer and a scaled map showing the location and identification of all production wells and water bodies within a one-mile radius of the site.
8. Name and telephone number of your environmental consultant, if any.

Additionally, pursuant to recent changes of the California Health and Safety Code Chapter 6.75 (Section 25299.37.2) and Division 7 of the Porter Cologne Water Quality Control Act 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 underground storage tanks prior to considering corrective action and cleanup or case closure. Since you are identified as the current primary or active responsible party 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 titleholders for the subject site. Therefore, please provide the name, mailing address, and telephone for all record fee title holders for 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.

If site assessment and/or monitoring data provided for the corrective action work ongoing at the subject site indicate that release(s) from the underground storage tank systems have impacted offsite property(ies), then please provide the name, mailing address, and phone number for all record fee title holders for the subject site and any offsite property(ies) impacted by releases from the subject site, together with a copy of county record of current ownership (grant trust deed), available from the County Recorder's Office, for each property affected for verification.

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Mr. Johnson

- 4 -

December 12, 2000

Please submit the workplan and the requested information to this Regional Board by January 30, 2001. If you have any questions regarding this matter, please contact Mr. Thomas A. Sayles at (213) 576-6747 or by e-mail at [tsayles@rb4.swrcb.ca.gov](mailto:tsayles@rb4.swrcb.ca.gov).

Sincerely,

  
Hubert Kang  
Senior Water Resources Control Engineer

Enclosures

cc: Ms. Yvonne Shanks, State Water Resources Control Board, Underground Storage Tank  
Cleanup Fund  
Mr. Bob Campbell, Water Replenishment District of Southern California  
Mr. Carl Sjoberg, Los Angeles County Department of Public Works, Environmental  
Programs Division

11718wprtblr

**California Environmental Protection Agency**

 Recycled Paper

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**Georyntec Consultants**

**ATTACHMENT 3**  
**U-Haul Documents Regarding 1992 Investigation**

**Blaes Environmental**

**From:** Robert Fraley [robert\_fraley@uhaul.com]  
**Sent:** Wednesday, October 04, 2006 2:33 PM  
**To:** blaes1@mindspring.com  
**Cc:** Joey Peck  
**Subject:** Uhaul 712028

Good Afternoon Gentleman,

Joey discovered the attached field notes for 712028. Thought you might want to look at them. If you cant read this version let us know and we will get you a hard copy.

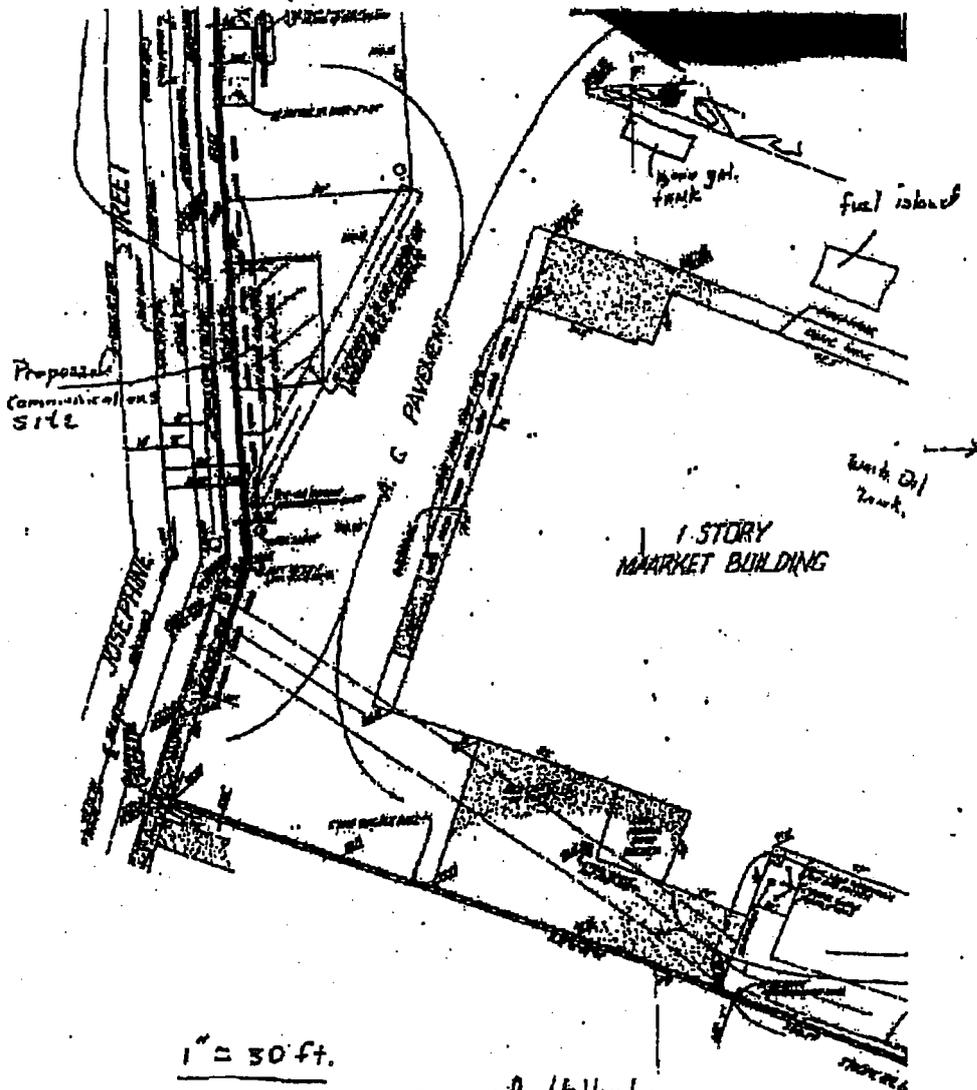
Rob

Robert Fraley  
Amerco Real Estate-Environmental  
phone: 802-263-6555 ext 4735  
fax: 602-277-5824  
email: robert\_fraley@uhaul.com

10/4/2006

Contaminant found in bank  
at the proposed runway  
site.

→ North



1" = 30 ft.

Scops of work  
\$ 6000-8000

Lyonsed U-Haul  
Facility

LOG SHEET

TIME	SAMPLING LOCATION (SP...)	SAMPLING DEPTH (FT)	TPH READING (PPM)	IF SOIL SAMPLE ID# (SP...)	IF VAPOR SAMPLE ID# (SP...)	SOIL CONDITIONS	Background
12:30	SP-1		10	N/A	N/A	Silty Sands	Background = 11 ppm
12:40	SP-1	11	7	N/A	N/A	" "	" "
13:20	SP-2	5	5,400	N/A	N/A	Silty Sands	Background = 3 ppm
14:00	SP-1	15	N/A	N/A	unable to collect bag sample due to low permeability soil conditions		
15:00	SP-2	13.5	N/A	1-1	N/A	Silty Sands, slight	
16:00	SP-2	16.5			N/A	front soil level	
16:30	SP-2	17.5	N/A	2-3	N/A	condition, mud, odor	

TPH = Total Petroleum Hydrocarbons

(PPM) - 2 parts per million

as follows using

method

PERFORMED / SAMPLED BY: SCK / MLZ

REVIEWED BY:

JOB NAME / LOCATION: 11-11-01 / 11-11-01

JOB DATE: 7/1/02 PAGE 1 OF 1



# FIELD REPORT

Client: U. Line  
 Project: Highway 101  
 Location: 101 & 101

Purpose of Site Visit: 1) Use Geo-Probe (MSU) to screen soil for clean water...  
 2) new sand layer location 3) collect one soil and one soil gas sample from location where contamination was found

1) Met with site representative (Dennis Lantry) and staff...  
 2) Walk to location of sand layer location. Spot was identified to the NW side of property near corner...  
 was located by and across it.

3) Use Geo-Probe (SP-1) to screen subsurface soils @ 15' below grade. Took readings @ 15' & 30'. Both readings were...  
 4) Geo-Probe (MSU) to screen subsurface soils @ 15' below grade. Submitted to collect one vapor sample @ 15' below grade. Low permeability soil, was unable to collect any vapor samples. However, did get a probe resistance reading of 5,400 ppm.

5) Set up MSU to collect 3 soil samples starting @ 15.5' below grade. Collected one soil sample @ 15.5', one @ 16.5', and one @ 17.5' below grade respectively.

6) Observed significant discoloration/odor @ 15' below grade. Particulate all the way down to 17.5' below grade.

On-site Discussions: 1) Best Bill and patch betw. SP-1 and SP-2 locations.  
 2) Ray Parke provided on-site plan to O&A for copying.  
 3) Dennis Lantry would like a copy of site plan provided.

4) Dennis would also like copy of results of SP-1, i.e.: log etc.  
 5) O&A provided folder from Ray Parke containing real estate info from highway site. P&E will return to Ray upon completion of Phase II.

Reviewed By: [Signature]

Project: <u>LYNWOOD 017</u>		Boring No.: <u>B-1</u>					
Location: <u>11716 LONG BEACH BLVD., LYNWOOD</u>		Elevation: <u>± 75' ASL</u>					
Job No.: <u>313-92</u>	Client: <u>SMART SMR</u>	Date: <u>8/11/92</u>					
Drill Method:	Driving Weight:	Logged By: <u>SW</u>					
Depth (Feet)	Lithology	Material Description	Samples		Laboratory Tests		
			No. Blows Per Foot	C <sub>u</sub> /C <sub>l</sub> Ratio	Moisture Content (%)	Dry Density (pcf)	Other Lab Tests
		<u>Fill</u>					
		<u>0-30 Sandy Silt</u> : Brown; Sl. moist; med. dense, micaceous; some clay; sand very fine-grained					
		<u>Alluvial</u>					
		<u>3.0-9.0 Sand</u> - Brown; Sl. moist; med. dense to dense; micaceous; very fine to fine-grained	1000	X			
		<u>9.0-18 Silty clay</u> - dark grayish-brown; very moist to wet; firm to stiff; high plasticity; micaceous; some plant material	1000	X			
		<u>C15</u> - becomes bluish-gray w/ distinct hydrocarbon odor					
		<u>18-21 Sandy Silt</u> - dark greenish-gray; very moist to wet; stiff; occ. voids; distinct hydrocarbon odor	1000	X			
		<u>21-25 Sand</u> - Brown; Sl. moist to moist; dense; micaceous; mild hydrocarbon odor	1000	X			
		<u>25-30</u> - ALTERNATING SAND/SANDY SILT AS DESCRIBED ABOVE	1000	X			
		<u>NO CAPPING</u> <u>NO GW</u>					
		<u>GINT</u>					

12/15

PLATE A-

Petra Geotechnical, Inc.