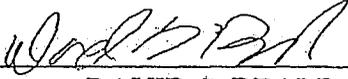
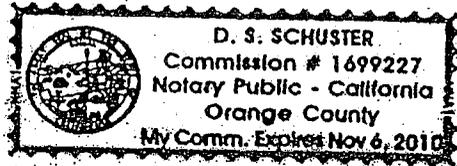


I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that it was executed on this 24th day of November 2008 at Costa Mesa, California.



DAVID S. BEARD

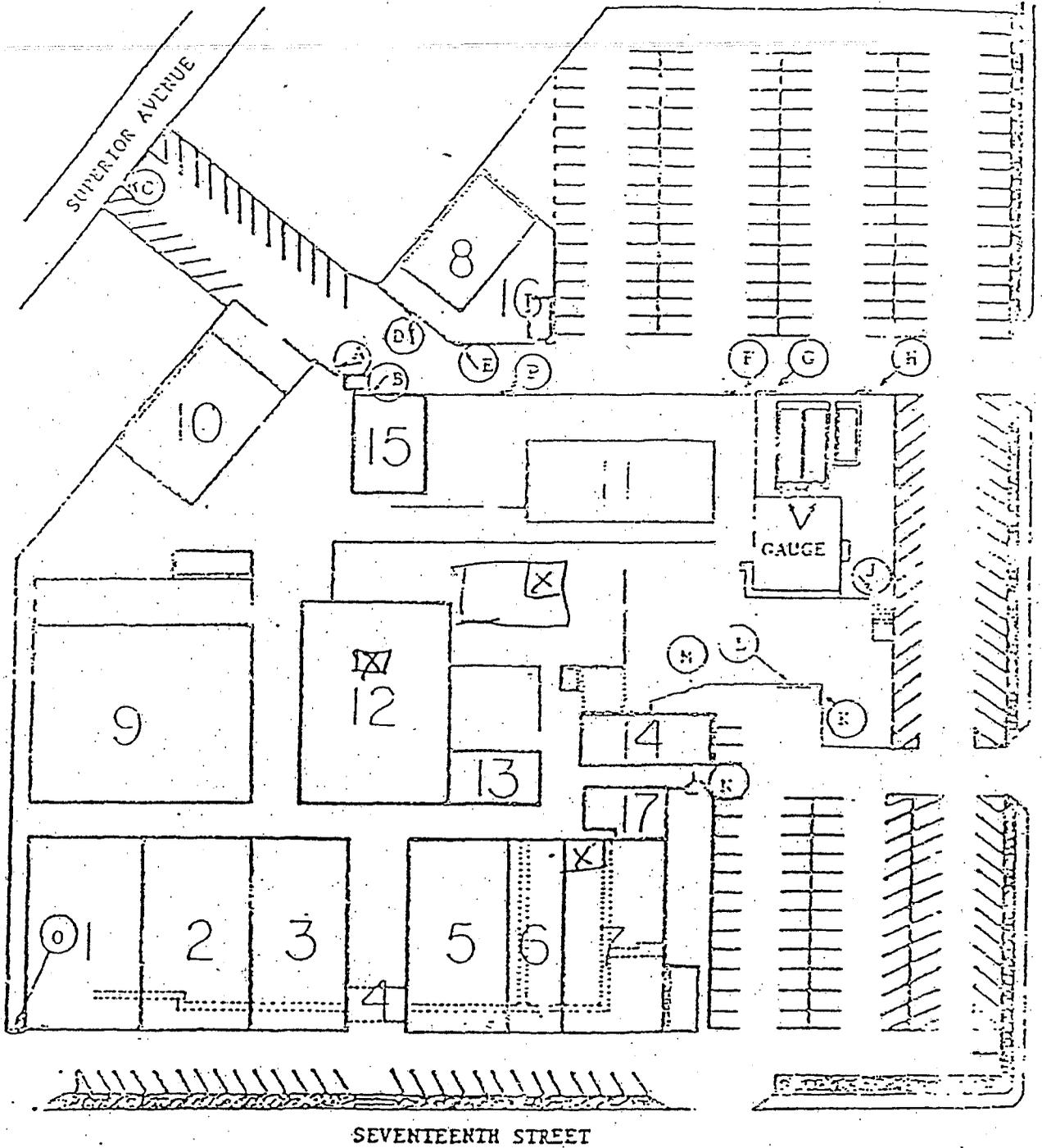
Subscribed and sworn to (or affirmed) before me on this 24st day of November, 2008, by David S. Beard, proved to me on the basis of satisfactory evidence to be the person who appeared before me.





D. S. Schuster, Notary Public

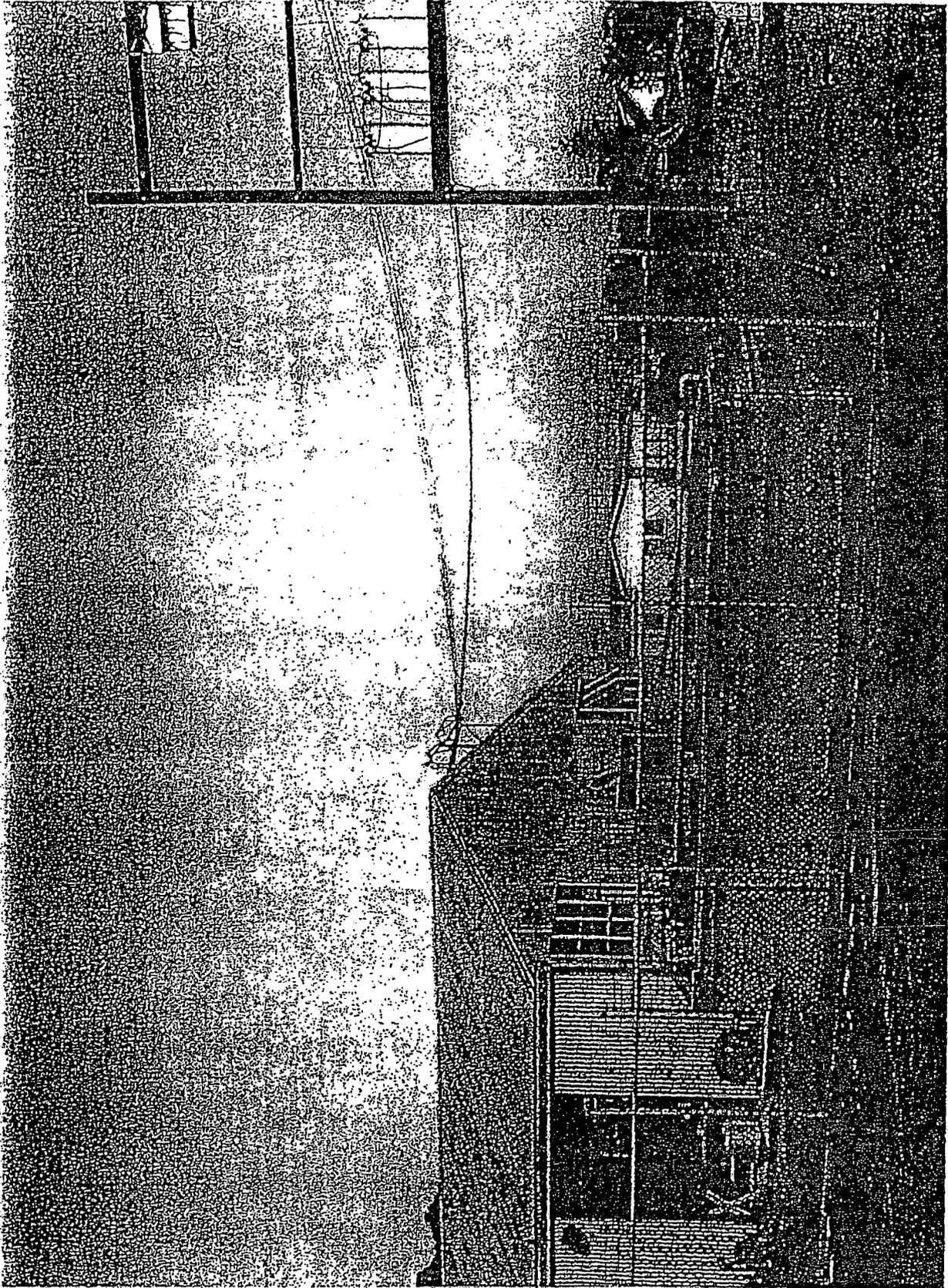
GATE LOCATIONS



J. C. CARTER CO
A DIVISION OF ITT



NORTH



CWTDCLIB3141258.1

RECEIVED
FEB 10 1960
U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

demand for oxygen pumps. In addition to other cryogenic pumps, ITT Carter therefore also designed and manufactured oxygen pumps.

7. The oxygen pumps made by ITT Carter were distinct from the other pumps made at the Property because the oxygen pumps had residual hydrocarbons that needed to be cleaned before exposure to oxygen.

8. The cleaning process for the oxygen pumps was extremely labor intensive and time consuming. Such process was, however, critical because if the oxygen pumps were not cleaned properly there was a risk of explosion when exposed to contaminants such as grease.

9. TCE and PCE were very efficient cleaning agents. The primary use of TCE and PCE at the Property was therefore to clean the oxygen pumps.

10. After the oxygen pumps were cleaned the TCE and PCE was placed in the steel container tank located in a concrete walled underground sump behind Building 9, in what is now the covered inspection staging area. The sump had a large manhole-size opening in the steel tank into which the TCE, PCE, used oil, and any other liquids that needed to be disposed of were stored.

11. I remember TCE because it was particularly effective at degreasing and also had a distinctive odor. TCE and PCE were used in various locations on the Property. One location was a "slosh pan" or wash tank into which machine parts were dunked, in the "deburring area" behind (south of) Buildings 1 and 2. Following the removal of any burrs from the part, the part was then dunked into the slosh pan and cleaned. The parts would get dirty from cooling oils and handling during the machining process. TCE and PCE were used for cleaning parts because they were available and were effective cleaning solvents.

12. At ITT Carter, as was common during the late 1970's, TCE and PCE were not handled with great care. Everyone had a fairly cavalier attitude about its use. During that time period, I remember seeing people at the Carter Plant removing parts from the degreasers and then shaking off the parts to remove excess TCE and/or PCE.

Use Of TCE And PCE At The Property Ended By 1980

13. The demand for oxygen pumps decreased in the late 1970's as the airforce and NASA space programs changed course. Specifically, Titan I came to an end and was replaced by Titan II and III, which did not use oxygen as a propellant. As a result, there was a diminished demand for oxygen pumps and the business therefore shifted its focus to other shaft seal pumps which used argon, nitrogen, and hydrazine.

14. Given the decrease in sales of the oxygen pumps, it was no longer profitable to clean the pumps on site because of the labor intensive cleaning process. Basically, we became so busy building other types of fuel pumps that we were not focused on oxygen pumps anymore.

15. As TCE and PCE developed a bad reputation, the industry also backed away from using these chemicals. In the late 1970s these chemicals were basically phased out because they were known to be dangerous and toxic to use.

16. ITT Carter also learned and appreciated the safety risks involved if the oxygen pumps were not cleaned properly.

17. Sometime between 1978 and 1979 we started sending the oxygen pumps offsite to be cleaned by Wyle Company.

18. By 1980 the cleaning room where TCE and PCE had been used on the oxygen pumps was shut down and converted into an office building.

19. Since TCE and PCE were primarily used at the Property to clean the oxygen pumps, when we stopped cleaning the oxygen pumps on site we also stopped using TCE and

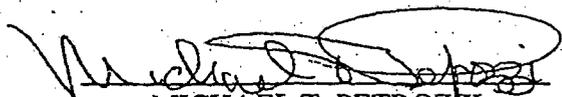
PCE to clean other machine parts. Also, we did not use TCE and PCE to clean the other fuel pumps because they were for hydrocarbon service. By 1980, TCE and PCE were no longer used on the Property.

20. Once the underground storage tank behind Building 9 was removed, all chemicals were disposed of in steel drums, later sealed and collected by an outside vendor and taken off site.

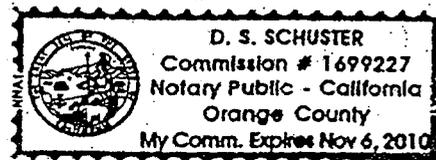
Veloz Carter Did Not Use TCE Or PCE At The Property

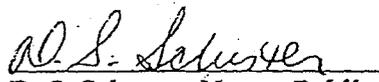
21. TCE and PCE were not used, spilled, or disposed of at the Property during the Veloz Carter era, from 1987-1997, and in fact TCE and PCE were not even present on the Property during that time period.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that it was executed on this 21st day of November 2008 at Costa Mesa, California.


MICHAEL T. PETROZZI

Subscribed and sworn to (or affirmed) before me on this 21st day of November, 2008, by Michael T. Petrozzi, proved to me on the basis of satisfactory evidence to be the person who appeared before me.




D. S. Schuster, Notary Public



Delta
Environmental
Consultants, Inc.

3330 Data Drive, Suite 100
Rancho Cordova, CA 95670
916/638-2085
FAX: 916/638-8385

December 1, 1990

~~CONFIDENTIAL~~-ATTORNEY WORK PRODUCT

Ms. Nancy Martin
California Regional Water Quality Control Board,
Santa Ana Region
5809 Indiana Avenue, Suite 200
Riverside, California 92506

Subject: Chemical Use History
J. C. Carter Company, Inc.
671 West 17th Street, Costa Mesa, California
Delta Project No. 40-90-005

Dear Ms. Martin:

Enclosed is Delta Environmental Consultants, Inc., chemical use history report for the subject site. If you have any questions, please call me at (916) 638-2085.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.

Scott B. Romine
Chemical Engineer

SBR:mjd
Enclosure

cc/enc: Ms. Diane R. Smith, Esq., Shell & Wilmer, Irvine, California
Ms. Melodic Grace, Esq., J. C. Carter Company, Inc.



CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-50-005

RECEIVED
DEC 3 1990
CR1008
SANTA ANA - REGION 8

Delta
Environmental
Consultants, Inc.

CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-90-005

CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-90-005

Prepared by:

DELTA ENVIRONMENTAL CONSULTANTS, INC.
3330 Data Drive, Suite 100
Rancho Cordova, California 95670
(916) 638-2085

December 3, 1990

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APPENDIX B Chemical Purchase Summary
APPENDIX C Chemical Disposal Summary
APPENDIX D Correspondence Requesting Information

CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-90-005

1.0 INTRODUCTION

This report was prepared by Delta Environmental Consultants, Inc. (Delta), for J. C. Carter Company, Inc. (J. C. Carter). J. C. Carter, and its consultants, have prepared this report based on information in its possession or made available to it since the issuance of the Board's order.

As is apparent from the text of the report, the information presently available may not be complete or comprehensive in every respect. J. C. Carter is continuing to gather additional data and records which may be in the possession of previous consultants, prior owners of the company, or public agencies. Please refer to the correspondence to same, all of which is attached to this report.

It was and continues to be J. C. Carter's hope that the expense of duplicating the efforts of prior consultants could be avoided by obtaining all prior files, records, and other documentation. It has not yet obtained access to or copies of previous working files despite repeated contacts with Hekemian, Converse and Schaefer-Dixon, but is continuing its efforts, and sees no present obstacle to those documents being made available in the very near future. Once all prior information is obtained J. C. Carter will update and supplement this report to reflect any new information obtained, or any additional analysis made possible by review of those documents.

If, despite J. C. Carter's efforts, it is unable to obtain access to such data to complete the site evaluation to the satisfaction of the Board, or if any newly obtained data requires updating for completeness, J. C. Carter will proceed to obtain any necessary information through its own efforts, so as to provide a complete and comprehensive analysis of the site's history, condition, and possible off-site sources of on-site impacts. Accordingly, J. C. Carter wishes to emphasize that this is a progress report which may be subject to modification in the future, and to assure the Board that J. C. Carter is continuing its efforts to meet the Board's schedules on a timely basis.

The purpose of this report is to describe the use, storage, and disposal practices for petroleum and other volatile hydrocarbon and halogenated hydrocarbon compounds used at the J. C. Carter facility. The information presented in this report was compiled from records available at the facility. Information regarding how compounds were used was gathered from interviews with J. C. Carter personnel. The present owners acquired the company January 22, 1987. Purchase orders are available back into 1985, and manifests are available from 1981. Documents relating to facility activities prior to 1981 have been requested from previous owners and consultants.

CHEMICAL USE AND DISPOSAL HISTORY

J. C. Carter Company, Inc.
671 West 17th Street, Costa Mesa, California
Delta Project No. 40-90-005
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1.1 Site History/Background

The first buildings on the facility, Buildings 1, 2, and 3 (site map, Figure 1), were constructed in 1952. These buildings now house the machine shop, parts storage, and assembly rooms for parts manufactured at the facility. Building 2 also houses the Purchasing Department. Building 3 also houses the production control and operations offices. Buildings 4 through 7 were constructed in 1959. These buildings now house the facility's engineering offices, marketing, accounting, and data processing departments. Building 9 was constructed in 1973, and now contains an additional machine shop. Building 10 was constructed in 1976, and now houses the shipping department. Building 11 was constructed in 1978, and houses the I/M test area. Buildings 12 and 13 were also constructed in 1978. Building 12 houses the I/M assembly area and offices. Building 13 houses a test area. Building 8, housing the maintenance shop and office, was constructed in 1979.

J. C. Carter wishes to emphasize that the current owners of the J. C. Carter site purchased the assets of the J. C. Carter Company, Inc., which included the Costa Mesa facility, on January 22, 1987. (JCC Acquisition Corp. took over operation and maintenance of the facility on October 1, 1986, before the actual sale transaction closed.) The waste oil underground storage tank located on the south side of Building 9 was removed in March 1986, almost a year before the current owners took title to the property, and over 6 months before the current owners took over operation and maintenance of the facility.

According to the purchase order records maintained by the present owners, which are available through 1985 only, though earlier records have been requested from previous owners, TCE and PCE have never been used at the site. Both the fact that the underground waste oil tank was removed before the present owners of the company controlled the site, and the fact that there is no evidence whatsoever that TCE and PCE have ever been used at the site, indicates that, even if the site were considered a source of the constituents found in the underlying ground water (which J. C. Carter continues to maintain it is not) the current owners and operators of the site are not the appropriate responsible parties.

J. C. Carter respectfully requests that the previous owners of the company be named as the responsible parties, and required to provide the Board with any information necessary to meet the Board's requirements. The previous owners of J. C. Carter Company, Inc., were ITT Corporation, which owned the company from January 30, 1973 until September 30, 1983, and Armatron International, Inc., which owned the company from September 30, 1983, until the purchase of the assets by JCC Acquisition Corporation on January 22, 1987.

ITT Corporation's address is 320 Park Avenue, New York, New York 10022; Armatron's address is 2 Main Street, Melrose, Massachusetts 02176. Since receipt of information indicating a lack of purchase order documents prior to 1985 and manifests before 1981, J. C. Carter has requested prior records from the previous owners, but such information, if it is available, has not yet been received. This report will be updated when any significant

CHEMICAL USE AND DISPOSAL HISTORY

J. C. Carter Company, Inc.
671 West 17th Street, Costa Mesa, California
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Page 3

additional information is received. It may be necessary to request the Board's assistance in obtaining information from previous owners.

2.0 CHEMICAL USE HISTORY

J. C. Carter has used and now uses many compounds typical to metal machining and aviation testing. In the documents reviewed, the use of TCE or PCE has not been documented. The only documents that indicate the use of chemical compounds on site are purchase orders and hazardous waste manifests as noted above. The use, storage, and disposal practices of J. C. Carter, as reconstructed from purchase orders and hazardous waste manifests, are described below for petroleum and other volatile hydrocarbon and halogenated hydrocarbon compounds. Records for chemical purchases are tabulated in Appendix B. Records of hazardous waste manifests are contained in Appendix C. Both purchase orders and manifests are on file at J. C. Carter.

Most compounds listed below, except trichloroethane (TCA), are kept in stock at all times. Drums are stored in the drum storage area near Building 8 for dispensing compounds on an as-needed basis. Compounds that are purchased in small quantities (5-gallon cans or smaller) are stored in flame-proof cabinets on the east side of Building 11 or in flame-proof cabinets in Building 2, also for use by employees as needed. TCA was used once at the facility as a cleaning fluid. TCA has not been used or stored at the facility since 1986.

Drums containing waste products were kept in the area behind Building 9 in the vicinity of the former underground storage tank and chip bins. Delta has been unable to determine what practices were used for accumulating, storing, and disposing waste products prior to the construction of new buildings or the installation of the former storage tank. Documents of site storage and disposal practices prior to 1981 have been requested from previous owners.

A test area was constructed along with Buildings 12 and 13. This area was built with sloped floors and secondary containment trenches. Floor spills, cleanings, and rainwater collected in these trenches are pumped to aboveground storage tank located south of Building 14.

2.1 Aviation Fuel

Jet A aviation fuel is used to test pumps and valves manufactured at the facility. Jet A aviation fuel has been purchased in bulk quantities since 1985 according to available purchase orders. Additional records have been requested from previous owners.

On-site Jet A storage includes eight tanks in the aero test area south of Building 13. The largest tank capacity is 800 gallons; one is 700 gallons, and the rest are 500 gallons or less. Because of a varying product mix, the amount of Jet A fuel on hand is not constant. Maximum capacity in the area is 3,750 gallons. Testing is

CHEMICAL USE AND DISPOSAL HISTORY

I. C. Carter Company, Inc.
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conducted in closed loops - the Jet A fuel is recirculated. Replacement Jet A fuel is needed when the fuel becomes mixed with water from condensation in the tank. Use records indicate that Jet A aviation fuel lasts from 6 weeks to 3 months before replacement is necessary.

When the jet fuel becomes mixed with water, it is pumped to the aboveground storage tank south of Building 14 and removed by a licensed waste hauler.

2.2 Solvents

Purchase orders indicate that the last time TCA was purchased at the facility was in 1986. Twenty gallons of TCA were purchased on January 3, 1986, and delivered on January 8, 1986. TCA was used in the production of an in-line pump. The parts were cleaned with TCA as some of the pumps would ultimately be used with liquid oxygen. This portion of the business was sold in January 1987. Interviews with site personnel indicate that 20 gallons of TCA would have been consumed by operations prior to the sale of the business in 1987.

Stoddard solvent has been and is currently used on site to test aero valves and pumps. Other solvents used at the facility include compounds known as 140-66, Type I Fluid, Type II Fluid, isopropyl alcohol (IPA), and #600 solvent and acetone.

The compound known as 140-66 is a hydrocarbon mixture that is used for testing hydraulic equipment in the aero test area south of Building 13. Type I Fluid is 100 percent iso-octane, and Type II Fluid is 70 percent iso-octane and 30 percent toluene. Both were and are used as test fluids in the aero test area.

Isopropyl alcohol and #600 solvent, a 50/50 mixture of IPA and toluene, are both used as cleaning solvents in Buildings 12 and 13. Acetone is used for cleaning parts in the assembly areas in Buildings 2 and 12.

Solvents have been purchased in 1-gallon, 5-gallon, or 55-gallon containers, and in bulk. The 55-gallon containers are stored in the drum storage area near Building 8.

Stoddard solvent is used in parts testing. When the Stoddard solvent used in testing deviates from specification through heating and shearing, it is disposed. Waste Stoddard solvent used in testing is stored in the tank south of Building 14 for transfer to a recycling facility by a licensed hauler.

Stoddard solvent is also used in the parts washer between Buildings 1 and 9. The spent solvent was previously disposed of in the waste oil tank formerly located to the south of Building 9. The spent solvent from the parts washer is now pumped out of the parts washer for transfer to a recycling facility by a licensed hauler.

CHEMICAL USE AND DISPOSAL HISTORY

I. C. Carter Company, Inc.
671 West 17th Street, Costa Mesa, California
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Page 5

2.3 Oils

Several different oils have been and are now being used at the facility. Several types of oils have been used. They are machine lubricating oils, hydraulic fluids, motor oils, and cutting oils.

Machine lubricating oils used at the facility include Mobil DTE-24, DTE-26, DTE Light, VACTRA #2, and Velocite #6. Machine oils are nonvolatile hydrocarbon mixtures used for lubricating the moving parts in the machines. They are purchased in 55-gallon drums. The oil in the machines is replaced with clean oil at various intervals, and the used oil is stored in 55-gallon drums and recycled.

Hydraulic fluids, used to test hydraulic equipment produced at the facility, have included ATF Type 210, Vaculine 1405, and Aero H.F.A. Hydraulic fluids are also nonvolatile hydrocarbon mixtures. When the hydraulic fluids fail to meet testing specifications, they are stored in 55-gallon drums for disposal by a licensed waste hauler. Skydrol, a phosphate ester, is also used as a hydraulic test fluid.

Motor oils such as Dillo 10W are used for vehicle maintenance. For the past 3 years, only five forklifts have been serviced on site. The oil is changed quarterly. Used oil is placed in 55-gallon drums and is recycled. In the past, company vehicles were serviced on site and the same procedures were followed. This practice was discontinued 3 years ago.

Cutting oils used in the past are Cindol #3202 and Hocut 757. Cindol is composed of 30 to 60 percent mineral oil with 1 to 10 percent diethanolamine. Hocut 757, also known as Cindol 757, is 30 to 60 percent mineral oil with 1 to 10 percent p-chloro-m-cresol. Cindol and Hocut were purchased in bulk quantities (drums) as needed, and were stored in the drum storage area near Building 8 or Building 9. Prior to 1986, these cutting oils were removed from the machine shops as drag-out and transferred to the former underground storage tank prior to disposal. After 1986, these cutting oils were transferred to 55-gallon drums for disposal by a licensed waste hauler. These cutting oils have not been used since 1987.

Since 1987, the cutting oil used is Mobile Mobilmet Omicron, which is greater than 95 percent refined mineral oils and contains no hazardous ingredients.

Whenever possible, coolant is used rather than cutting oil. Arrow 1100B and Arrow 6100 are water-soluble machining coolants which were used until 1988. They were used where cutting oils did not produce the desired finish on machined parts. The Arrow coolants are composed of various concentrations, ethanolamine in water.

TrimSol coolant is currently used in place of cutting oil for most of the parts machined at the facility. TrimSol is a proprietary, nontoxic, water-soluble emulsion which is diluted to approximately 10 percent solution in water for use.

CHEMICAL USE AND DISPOSAL HISTORY

J. C. Carter Company, Inc.
671 West 17th Street, Costa Mesa, California
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These coolants are not classified as Resource Conservation and Recovery Act (RCRA) or California hazardous wastes.

Used coolant was stored in a 900-gallon aboveground plastic tank and recycled. In the last year, a licensed waste hauler has picked up the used coolant as reduced quantities do not support recycling.

2.4 Miscellaneous

A parts deburring machine, located between Buildings 1 and 9, uses two components for cleaning and deburring metal parts produced in the machine shops in Buildings 1 and 9. A crystalline silica suspended in polyester resin, known as VF2 wedge media, and a compound known as VF 77, are used in the deburring machine. The VF 77 contains 7 percent butanol in a caustic detergent and water solution. The VF 77 is purchased in drums and used in small quantities as required. Drum storage has been between Buildings 1 and 9 near the deburring machine.

During use, the wedge media are disintegrated by being rotated with the parts. The residue empties into a clarifier which is emptied as necessary, transferred to drums, and removed by a hazardous waste hauler.

The facility stores various lubricants (e.g., WD-40 and spray-penetrating oils) which are used in small quantities in production and testing areas. These compounds are typically used in spray bottles which are refilled from 5-gallon storage containers. Bulk storage containers are now stored either in the storage cabinets located on the west side of Building 11 or in the drum storage area near Building 8.

A proprietary packing material, generically named insta-pak, is occasionally used for product shipping. The compounds are mixed to form a foam packing material used to isolate parts in cardboard boxes when necessary. Waste containers are thrown in the garbage for disposal according to the instructions supplied by the manufacturer.

2.5 Cryogenic Test Area

Cryogenic testing has been periodically conducted at the facility. Compounds used during cryogenic testing include liquid nitrogen, liquid propane, and liquid butane. The cryogenic testing compounds are stored in aboveground tanks located in the southwest corner of the facility. When testing is completed, the propane and butane are sold back to the suppliers or burned off in a permitted leg flare located at the north end of the cryogenic area. Liquid nitrogen simply evaporates.

2.6 Diesel Fuel

Diesel fuel is used to power a generator that is needed occasionally for cryogenic testing. The generator is capable of providing 50 hertz as well as 60 hertz. Prior to August 1990, diesel was stored in an underground tank located behind Building 12. The tank was cleaned and abandoned according to all California state and local regulations in August 1990, and documentation is on file at J. C. Carter. Soil samples collected from slant borings below the former diesel tank indicate that no diesel was present in the soils underlying the tank.

CHEMICAL USE AND DISPOSAL HISTORY

J. C. Carter Company, Inc.
671 West 17th Street, Costa Mesa, California
Delta Project No. 40-90-005
Page 7

3.0 CONCLUSION

This report states the results of a review of the documents available at the facility relative to the use, storage, and disposal of hydrocarbon-based chemicals at the J. C. Carter facility. Information regarding the prior chemical use and disposal has been requested from previous owners.

4.0 REMARKS/SIGNATURES

Information presented in this report is based on information provided by the client. This report has been prepared solely for the use of J. C. Carter, and any reliance on information presented in this report by third parties shall be at such party's sole risk. Other than this, no warranty is implied or intended.

DELTA ENVIRONMENTAL CONSULTANTS, INC.

This report was prepared by:

Scott B. Romine
Scott B. Romine
Chemical Engineer

Date 12-1-90

This report was reviewed by:

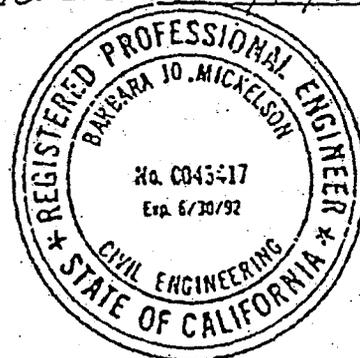
Michael J. O'Brien
Michael J. O'Brien
Hydrogeologist/Project Manager

Date 12-1-90

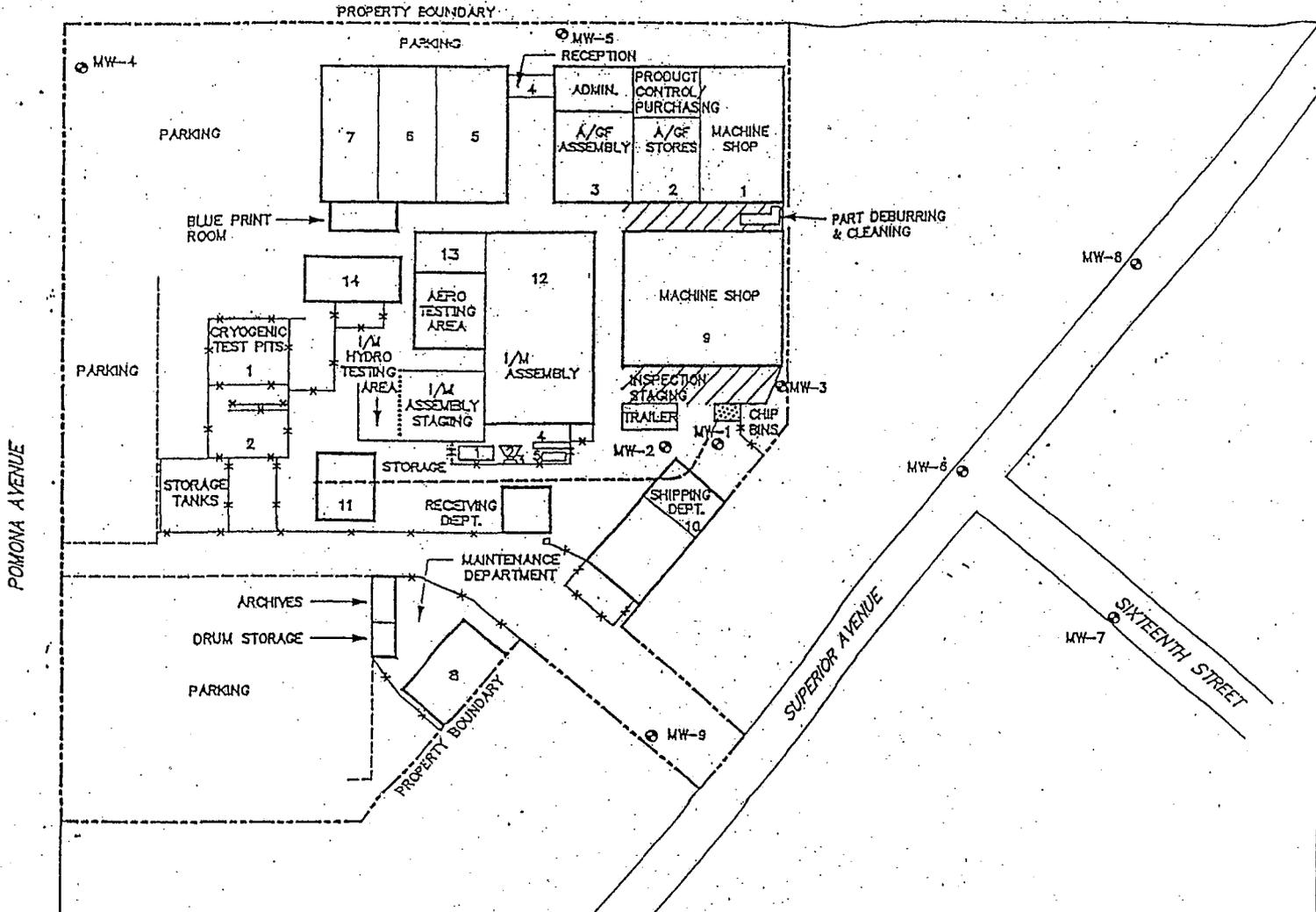
The work performed in this report was done under the supervision of a California Professional Engineer:

Barbara J. Mickelson
Barbara J. Mickelson, P.E.
California Registered
Professional Engineer #43417

Date 12/1/90



SEVENTEENTH STREET



- LEGEND:
- x — FENCE
 - - - - - APPROX. LOCATION OF UNDERGROUND PI
 - ▨ ROOFED AREA
 - ▩ FORMER TANK LOCATION
 - 1 GENERATOR
 - 2 TRANSFORMERS
 - 3 UNDERGROUND STORAGE TANK
 - 4 TRANSFORMERS
 - 5 MAIN ELECTRICAL PANELS
 - ⊙ MW-1 MONITORING WELL LOCATION

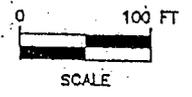


FIGURE 1.
SITE MAP
J.C. CARTER
671 WEST SEVENTEENTH STREET
COSTA MESA, CA.

PROJECT NO. 40-00-005 FILE NO. 00-005-1 REVISION NO. 3	DRAWN BY B.D. 11/27/90 PREPARED BY SER 11/28/90 REVIEWED BY M.S.U. 11-30-90
---	--

Delta
Environmental
Consultants, Inc.

APPENDIX A

Cutting Oil Tank Removal Records

REPORT

TRUESDAIL LABORATORIES, INC.



CHEMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH - DEVELOPMENT - TESTING

14201 FRANKLIN AVENUE
TUSTIN, CALIFORNIA 92680
AREA CODE 714 • 730-6211
AREA CODE 213 • 225-1511
CABLE: TRU2LAB

CLIENT Griffin Construction
54712 Cherrylee Lane
Yorba Linda, CA. 92686

DATE March 21, 1986

RECEIVED March 19, 1986

SAMPLE ATTN: Jack Griffin
Soil from the J.C. Carter - 671 W. 17th St. Costa Mesa

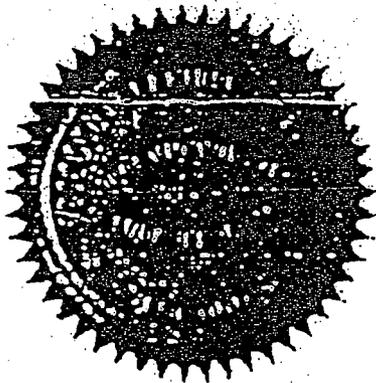
LABORATORY NO. 11223

INVESTIGATION Total Petroleum Hydrocarbons Analysis

RESULTS

<u>Sample</u>	<u>Milligrams per Kilogram</u>
JC1 - Pile in and around tank	3220.
JC2 - Bottom of Cavity	6380.
JC3 - Side wall under pipes	10600.

Samples collected by Sylvia Marston of the Orange County, Department of Health Services on March 19, 1986. Soils were received at Truesdail Laboratories chilled and sealed. Analysis was performed according to EPA 418.1.



Respectfully Submitted

TRUESDAIL LABORATORIES, INC.

Richard D. Reid
Richard D. Reid
Chief Water Chemist

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any other manner.

CITY OF COSTA MESA CONSTRUCTION PERMIT

Project Address 671 W. 17th St.
 Applicant's Mailing Address 5472 Cherry Ln. W. Y.C.
 Owner's Name J.C. WALTER W. Phone 545-3421
 Address 671 W. 17th St. C.M.
 Arch/Eng. _____ License No. _____
 Address _____

Contractor's Name S.R. Hines Const. Phone 558-6525
 Address (mailing) 5472 Cherry Ln. W. Y.C.
 City License No. 035721

LICENSED CONTRACTOR DECLARATION
 I hereby affirm that I am licensed under provisions of Chapter 9 (commencing with section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect.
 License Class 3 License No. 821996
 Date 3-11-86 Signature [Signature]

WORKERS' COMPENSATION DECLARATION
 I hereby affirm that I have a certificate of consent to self-insure or a certificate of workers' Compensation insurance, or a certified copy thereof (Section 800, Lab. Code, § 985 # 693) Company STATE FUND
 Certified copy is hereby furnished.
 Certified copy filed with the city Building Division.
 Date 3-12-86 Applicant [Signature]

EXEMPTION FROM WORKERS' COMPENSATION DECLARATION
 This section need not be completed if the permit is for one hundred (\$100) or less.
 I certify that in the performance of the work for which this permit is issued, I will not employ any person in any manner so as to become subject to the workers' Compensation Laws of California.
 Date _____ Signature _____

NOTICE If, after making this declaration, you would become subject to the workers' Compensation provisions of the Labor Code, you must forthwith comply with such provisions or this permit shall be deemed revoked.
CONSTRUCTION LENDING AGENCY
 I hereby affirm that there is a construction lending agency for the performance of the work for which this permit is issued (Section 3087 Civ. C.)
 Lender's Name _____
 Lender's Address _____

OWNER BUILDER DECLARATION
 I hereby affirm that I am exempt from the Contractor's License Law for the following reason (Section 7031.5 Business and Professions Code): Any city or county which requires a permit to construct, alter, improve, demolish or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he/she is licensed pursuant to the provisions of the Contractor's License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he/she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500).
 I, as owner of the property or my employees with respect to their sole compensation, will do the work, and the structure is not intended or offered for sale (Section 7044, Business and Professions Code). The Contractor's License Law does not apply to an owner of a property who builds or improves a room, and who does such work himself/herself or through his or her own employees, provided that such improvement is not intended or offered for sale, if, however, the building or improvement is sold within one year of completion, the owner will have the burden of proving he/she did not build or improve for the purpose of sale).
 I, as owner of the property, am exclusively contracting with licensed contractor to construct the project (Section 7044, Business and Professions Code) or Contractor's License Law does not apply to an owner of a property who builds or improves a structure, and who contracts for such project with a contractor (license pursuant to the Contractor's License Law). I am aware that not all of their workers' Compensation insurance should be provided to me. I am exempt under Section _____ B. & P. C. for this reason _____

Owner
 I hereby certify that I have read this declaration and state that the above declaration is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes.
 Date 3-11-86
 Owner's License or SS # 745-30110173

PERMIT NO. B 23036 TRACT NO. _____ LUT NO. _____ UNIT NO. _____

TYPE OF CONSTRUCTION NEW ADD ALTERATION REPAIR
 CONVERSION DEMOLISH OTHER
 DESCRIPTION OF WORK/USE OF BLDG. _____

TYPE OF PERMIT GRADING FOUNDATION STRUCTURAL
 TENANT ELECTRICAL PLUMBING MECHANICAL
 OTHER REMOVE TANK, BACKFILL & CONCRETE
 PROJECT DESCRIPTION SQ. FT. _____ OCCUPANCY 5000
 CONSTRUCTION TYPE _____ VALUATION \$ _____
 ZONE _____ GRADING (CO. YDS) _____ ACRES _____

Remarks REMOVE UNDERGROUND TANK ON TANK (20 pts water in 1 part oil)

PLUMBING		FEES	
Bar Sink	Showers		
Backflow Preventer	Service Sink		
Backflow Irrigation	Sewer Cap		
Bathrooms	Sewer Connection		
Chimneys	Solar Collectors		
Dishwasher	Solar Piping		
Drinking Fountains	Solar Tank		
Floor Drains	Swimming Pool w/Spa		
Floor Sinks	Urinal		
Gas Service	Water Closet		
Interceptors	Water Heater		
Kitchen Sink	Water Service		
Lavatories	Auto-Wash		
P-Trap	Laundry Trays		
Roof Drains			
Reinspection Fee	\$18	Issue Fee	\$ 3

MECHANICAL		FEES	
Beller	Hood or Type I Canopy Type II		
Duct - Under Ground			
Duct - Structural	Refrigeration System		
Duct - Ventilating	0-100,000 BTU 100,000 BTU		
Exhaust System Multiple	System Repak/Alteration		
Fire/Fact Blt. ICBO #	Fire Dampers		
Heating System & Ducting 0-100,000 BTU 100,000 BTU	Registers		
Reinspection Fee	\$18	Issue Fee	\$ 3

A.P. #		Zone
S E T B A C K S	Main Building:	
	Accessory Building:	
	Front	
	Rear	
P i n g R e f. #	Right	P a r k i n g R e q. /P r o v i d e d
	Left	
Planning Notes:		

ELECTRICAL		FEES	
Automatic Washer	Transformer 15-50 KW 50+ KW		
Construction Pole Sub.			
Cooking Unit	Meter Up to 100 amps		
Dishwasher	Meter Over 100 amps		
Dryers Gas Electric	Sub Panel		
Fan	Motors 0-1 HP 1X-8		
F.A.U.	Inc. Solar 9-15 HP 16-15+		
Fixtures	Microwave		
Device Boxes	Pole Light		
Outlets	Range		
Switches	Sign		
Garbage Disposal	Standing Sections		
Generator 0-5 KW 5-15 KW	Trash Compactor		
Reinspection Fee	\$18	Issue Fee	\$ 3

DEVELOPMENT SERVICES REQUIREMENTS:
 Zoning Approved By _____ Date _____
 Building Approved By _____ Date 3/12/86
 Application Issued By [Signature] Date _____

SUMMARY OF FEES			
BUILDING PERMIT	\$ 10.00	SMIP	\$.50
PLAN CHECK	\$ _____	PERMIT	\$ _____
PLUMBING	\$ _____	ISSUANCE	\$ _____
PLAN CHECK 25%	\$ _____	ENERGY P.C.	\$ _____
ELECTRICAL	\$ _____	GRADING	\$ _____
PLAN CHECK 50%	\$ _____	MICROFILM	\$ _____
MECHANICAL	\$ _____	TOTAL FEE	\$ 10.50
PLAN CHECK 25%	\$ _____		

APPENDIX B
Chemical Purchase Summary

J.C. CARTER COMPANY, INC.

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
#600 SOLVENT	1/07/84	10 GAL	AERO TEST
#600 SOLVENT	11/13/85	10 GAL	AERO TEST
#600 SOLVENT	11/20/85	20 GAL	AERO TEST
#600 SOLVENT	6/03/86	10 GAL	AERO TEST
#600 SOLVENT	6/08/86	10 GAL	AERO TEST
#600 SOLVENT	10/14/86	10 GAL	MIKOLS
#600 SOLVENT	1/23/87	10 GAL	AERO TEST
#600 SOLVENT	6/26/87	10 GAL	AERO TEST
#600 SOLVENT	1/18/88	25 GAL	ASS'Y
#600 SOLVENT	1/17/90	10 GAL	MACH SHOP
140-66 SOLVENT	11/24/78	500 GAL	MAINT.
140-66 SOLVENT	2/26/85	500 GAL	AERO TEST
140-66 SOLVENT	3/12/85	1000 GAL	AERO TEST
140-66 SOLVENT	4/04/85	600 GAL	I/M TEST
140-66 SOLVENT	6/19/85	500 GAL	AERO TEST
140-66 SOLVENT	8/29/85	500 GAL	AERO TEST
140-66 SOLVENT	12/19/88	500 GAL	MAINT.
ACETONE	6/07/85	10 GAL	AERO TEST
ACETONE	10/31/85	55 GAL	PUMP ASS'Y
ACETONE	11/05/85	365 LB	PUMP ASS'Y
ACETONE	12/24/85	10 GAL	AERO TEST
ACETONE	9/16/86	55 GAL	PUMP ASS'Y
ACETONE	10/14/86	55 GAL	MIKOLS
ACETONE	6/25/87	10 GAL	AERO TEST
ACETONE	1/13/88	55 GAL	ASS'Y
ACETONE	9/22/88	5 GAL	
ACETONE	1/04/89	55 GAL	MIKOLS
ACETONE	7/18/89	55 GAL	MACH SHOP
ACETONE	6/18/90	55 GAL	I/M TEST
AERO HFA AV. HYD. FLUID	2/13/85	55 GAL	AERO G/F
AERO HFA AV. HYD. FLUID	5/31/85	55 GAL	AERO TEST
ARROW 1100B COOLANT	4/27/88	110 GAL	MAINT.
ARROW 1100B COOLANT	6/13/88	110 GAL	MAINT.
ARROW 1100B COOLANT	7/28/88	110 GAL	MAINT.
ARROW 1100B COOLANT	10/10/88	110 GAL	MAINT.
ARROW 6100 COOLANT	5/22/87	110 GAL	MAINT.
ARROW 6100 COOLANT	7/10/87	110 GAL	MAINT.
ARROW 6100 COOLANT	7/27/87	110 GAL	MAINT.
ARROW 6100 COOLANT	10/07/87	110 GAL	MAINT.
ARROW 6100 COOLANT	11/24/87	110 GAL	MAINT.
ARROW 6100 COOLANT	1/29/88	165 GAL	MAINT.
ATF TYPE 210	2/28/85	55 GAL	MAINT.
ATF TYPE 210	1/17/86	55 GAL	MAINT.
ATF TYPE 210	10/06/87	55 GAL	MAINT.
BRAYCO MICRONIC HYD. FLUID	1/17/86	165 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	3/17/86	110 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	5/22/86	55 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	2/11/87	55 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	2/04/88	55 GAL	I/M TEST

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
BRAYCO MICRONIC HYD. FLUID	2/07/89	55 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	5/09/89	165 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	5/31/90	110 GAL	AERO TEST
BRAYCOAT PETROLATUM	10/30/85	48 LB	MIKOLS
BUTANE	9/19/85	4200 GAL	I/M TEST
BUTANE	5/21/86	1000 GAL	I/M/TEST
BUTANE	5/22/86	1000 GAL	I/M TEST
BUTANE	6/06/86	1000 GAL	I/M TEST
CINDOL #3202	1/31/85	110 GAL	MAINT.
CINDOL #3202	3/04/85	110 GAL	MAINT.
CINDOL #3202	4/01/85	110 GAL	MAINT.
CINDOL #3202	5/06/85	110 GAL	MAINT.
CINDOL #3202	6/10/85	110 GAL	MAINT.
CINDOL #3202	7/16/85	108 GAL	MAINT.
CINDOL #3202	8/02/85	108 GAL	MAINT.
CINDOL #3202	9/13/85	108 GAL	MAINT.
CINDOL #3202	10/31/85	108 GAL	MAINT.
CINDOL #3202	12/01/85	108 GAL	MAINT.
CINDOL #3202	1/17/86	110 GAL	MAINT.
CINDOL 757	4/03/86	108 GAL	MAINT.
CINDOL 757	8/12/86	110 GAL	MAINT.
CINDOL 757	12/15/86	108 GAL	MAINT.
CINDOL 757	2/23/87	108 GAL	MAINT.
CINDOL 757	4/06/87	110 GAL	MAINT.
COOLANT	1/24/85	15 GAL	MAINT.
COOLANT	11/06/85	10 GAL	MAINT.
COOLANT	3/04/86	10 GAL	TOOL CRIB
COOLANT	3/28/86	5 GAL	MAINT.
COOLANT	1/13/89	5 GAL	MAINT.
COOLANT	1/25/89	5 GAL	MAINT.
COOLANT	5/08/89	15 GAL	MAINT.
COOLANT	12/22/89	10 GAL	MAINT.
COOLANT	7/20/90	20 GAL	ENG. TEST
CUTTING OIL	3/27/90	110 GAL	MAINT.
DEGREASER (DETERGENT)	1/22/85	55 GAL	MAINT.
DIESEL FUEL	10/02/87	700 GAL	I/M TEST
DIESEL FUEL	10/13/87	903 GAL	I/M TEST
DIESEL FUEL	10/23/87	700 GAL	I/M TEST
DILLO 400 10W MOTOR OIL	6/04/85	24 QTS.	MAINT.
DSL68 COMPRESSOR OIL	1/23/85	10 GAL	MAINT.
DTE LIGHT	7/11/85	110 GAL	MAINT.
DTE LIGHT	11/21/85	55 GAL	MAINT.
DTE LIGHT	11/26/85	55 GAL	MAINT.
DTE LIGHT	9/18/86	55 GAL	MAINT.
DTE LIGHT	3/07/89	55 GAL	MAINT.
DTE LIGHT	12/01/89	55 GAL	MAINT.
DTE LIGHT	10/30/90	55 GAL	MAINT.
DTE-24	1/04/85	5 GAL	MAINT.
DTE-24	3/26/85	55 GAL	MAINT.
DTE-25	3/26/85	55 GAL	MAINT.

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
DTE-25	9/18/86	55 GAL	MAINT.
DTE-25	4/28/87	55 GAL	MAINT.
DTE-25	9/01/87	55 GAL	MAINT.
DTE-25	11/23/87	55 GAL	MAINT.
DTE-25	4/11/88	55 GAL	MAINT.
DTE-25	6/29/89	55 GAL	MAINT.
DTE-25	9/27/89	55 GAL	MAINT.
DTE-25	10/30/90	55 GAL	MAINT.
DTE-26	2/28/85	55 GAL	MAINT.
DTE-26	6/09/86	55 GAL	MAINT.
DTE-26	7/01/88	55 GAL	MAINT.
DTE-26	6/29/89	55 GAL	MAINT.
DTE-26	6/27/90	55 GAL	MAINT.
DUO SEAL PUMP OIL	9/05/85	20 GAL	I/M TEST
DUO SEAL PUMP OIL	9/16/85	20 GAL	I/M TEST
DUO SEAL PUMP OIL	11/07/85	10 GAL	I/M TEST
DUO SEAL PUMP OIL	4/11/86	15 GAL	I/M TEST
DYKEM REMOVER/THINNER	6/28/85	8 GAL	TOOL CRIB
DYKEM REMOVER/THINNER	9/27/85	8 GAL	TOOL CRIB
DYKEM REMOVER/THINNER	11/21/86	8 GAL	TOOL CRIB
EPOXYLITE SOLVENT	9/23/85	1 GAL	VLVE ASS'Y
EPOXYLITE VARNISH	9/23/85	1 GAL	VLVE ASS'Y
HERBASIDAL (WEED KILLER)	6/09/86	5 GAL	I/M TEST
HONING OIL	10/20/86	55 GAL	TOOL CRIB
HYD. OIL	5/09/89	55 GAL	ENG. TEST
INSTA PAK	3/18/85	30 GAL	SHIPPING
INSTA PAK	2/04/86	30 GAL	SHIPPING
INSTA PAK	4/17/86	30 GAL	SHIPPING
INSTA PAK	5/21/86	30 GAL	SHIPPING
INSTA PAK	12/05/88	30 GAL	SHIPPING
ISOPROPYL ALCOHOL	4/11/85	10 GAL	MAINT.
ISOPROPYL ALCOHOL	5/16/85	110 GAL	MAINT.
ISOPROPYL ALCOHOL	9/06/85	110 GAL	MAINT.
ISOPROPYL ALCOHOL	12/24/85	110 GAL	MAINT.
ISOPROPYL ALCOHOL	2/24/86	110 GAL	MAINT.
ISOPROPYL ALCOHOL	5/23/86	110 GAL	MAINT.
ISOPROPYL ALCOHOL	8/28/86	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	12/04/86	110 GAL	MIKOLS
ISOPROPYL ALCOHOL	3/10/87	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	6/22/87	110 GAL	MAINT.
ISOPROPYL ALCOHOL	9/28/87	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	11/03/87	110 GAL	MAINT.
ISOPROPYL ALCOHOL	1/13/88	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	4/11/88	110 GAL	MAINT.
ISOPROPYL ALCOHOL	7/18/88	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	9/02/88	55 GAL	
ISOPROPYL ALCOHOL	9/22/88	110 GAL	MIKOLS
ISOPROPYL ALCOHOL	1/16/89	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	3/23/89	110 GAL	MAINT.
ISOPROPYL ALCOHOL	6/14/89	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	8/01/89	110 GAL	MACH SHOP

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
ISOPROPYL ALCOHOL	11/28/89	5 GAL	
ISOPROPYL ALCOHOL	5/01/90	110 GAL	MACH SHOP
ISOPROPYL ALCOHOL	6/07/90	110 GAL	MACH SHOP
ISOPROPYL ALCOHOL	7/09/90	5 GAL	
JET A FUEL	7/11/83	2000 GAL	AERO TEST
JET A FUEL	10/05/83	1600 GAL	AERO TEST
JET A FUEL	3/27/84	1500 GAL	AERO TEST
JET A FUEL	6/27/84	1500 GAL	AERO TEST
JET A FUEL	8/01/84	1100 GAL	AERO TEST
JET A FUEL	9/12/84	1500 GAL	AERO TEST
JET A FUEL	11/07/84	1500 GAL	AERO TEST
JET A FUEL	2/08/85	1000 GAL	AERO TEST
JET A FUEL	3/16/85	1500 GAL	AERO TEST
JET A FUEL	5/28/85	1200 GAL	AERO TEST
JET A FUEL	8/15/85	1000 GAL	AERO TEST
JET A FUEL	11/11/85	1200 GAL	AERO TEST
JET A FUEL	7/05/88	700 GAL	AERO TEST
JET A FUEL	7/14/88	1000 GAL	AERO TEST
JET A FUEL	11/15/88	1000 GAL	AERO TEST
JET A FUEL	3/14/89	510 GAL	TEST
JET A FUEL	6/12/89	1000 GAL	AERO TEST
JET A FUEL	9/29/89	1000 GAL	AERO TEST
JET A FUEL	5/10/90	1000 GAL	AEROTEST
JET A FUEL	6/12/90	1500 GAL	SERO TEST
JP-4 JET FUEL	12/12/89	5 GAL	ENG TEST
JP-5 JET FUEL	6/16/86	495 GAL	I/M TEST
KESTER FLUX	1/15/85	4 GAL	PUMP ASS'Y
METHYL ALCOHOL	7/03/90	55 GAL	ENG TEST
METHYLETHYLKETONE	1/09/90	1 GAL	AERO TEST
METHYLETHYLKETONE	6/18/90	1 GAL	I/M TEST
MOLD RELEASE 225	8/13/85	4 GAL	PUMP ASS'Y
MOTOR OIL	3/11/88	3 GAL	MAINT.
NAPHTHENIC ACID	5/13/88	500 GAL	I/M TEST
NAPHTHENIC ACID	5/24/88	500 GAL	I/M TEST
NON DET. MOTOR OIL	6/24/85	24 QTS.	MAINT.
OMICRON CUTTING OIL	9/30/87	110 GAL	MAINT.
OMICRON CUTTING OIL	11/06/87	500 GAL	MAINT
OMICRON CUTTING OIL	12/01/89	110 GAL	MAINT.
OMICRON CUTTING OIL	2/08/90	55 GAL	MAINT.
OMICRON CUTTING OIL	6/27/90	110 GAL	MAINT.
OMICRON CUTTING OIL	8/27/90	110 GAL	MAINT.
PROPANE	10/20/86	541 GALS	I/M TEST
PROPANE	11/14/86	1 CS CYL'S	METR. LAB
PROPANE	11/19/86	2866 GAL	I/M TEST
PROPANE	11/21/86	501 GAL	I/M TEST
ROYCO COOLANT	11/27/89	20 GAL	ENG TEST
RUSTOLEUM SPRAY PAINT	9/11/85	9 GAL	REC.
SKYDROL 500B-4 FLUID	5/09/85	55 GAL	AERO TEST
SKYDROL 500B-4 FLUID	6/24/86	10 GAL	AERO TEST
SKYDROL 500B-4 FLUID	11/06/86	10 GAL	AERO TEST
SKYDROL 500B-4 FLUID	1/06/89	110 GAL	AERO TEST

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
SOLVENT	5/15/90	10 GAL	MAINT.
SOLVENT #1250	11/15/88	6 QUARTS	AERO TEST
SPRAY PAINT	2/17/86	9 GAL	SCALA
SPRAY PAINT	3/17/86	3.5 GAL	STORES
SPRAY PAINT	5/22/86	5 GAL	I/M TEST
TRICHLOROETHANE	1/15/85	55 GAL	PUMP ASS'Y
TRICHLOROETHANE	1/08/86	20 GAL	PUMP ASS'Y
TRIMSOL	11/08/88	5 GAL	MAINT.
TRIMSOL	1/23/89	110 GAL	MAINT.
TRIMSOL	4/24/89	100 GAL	MAINT.
TRIMSOL	9/08/89	108 GAL	MAINT.
TRIMSOL	9/19/89	110 GAL	MAINT.
TRIMSOL	1/10/90	54 GAL	MAINT.
TRIMSOL	3/27/90	54 GAL	MAINT.
TRIMSOL	6/27/90	55 GAL	MAINT.
TRIMSOL	10/25/90	54 GAL	MAINT.
TYPE I FLUID	2/13/85	10 GAL	TEST
TYPE I FLUID	3/18/85	10 GAL	I/M TEST
TYPE I FLUID	3/01/88	25 GAL	I/M TEST
TYPE I FLUID	3/24/88	50 GAL	I/M TEST
TYPE I FLUID	4/22/88	40 GAL	I/M TEST
TYPE I FLUID	7/22/88	15 GAL	I/M TEST
TYPE II SOLVENT	5/17/85	110 GAL	I/M TEST
TYPE II SOLVENT	9/25/85	108 GAL	I/M TEST
TYPE II SOLVENT	11/03/85	500 GAL	AERO TEST
TYPE II SOLVENT	11/13/85	500 GAL	AERO TEST
TYPE II SOLVENT	1/02/86	500 GAL	AERO TEST
TYPE II SOLVENT	3/13/86	800 GAL	AERO TEST
TYPE II SOLVENT	5/30/86	500 GAL	AERO TEST
TYPE II SOLVENT	6/11/86	600 GAL	I/M TEST
TYPE II SOLVENT	6/13/86	600 GAL	I/M TEST
TYPE II SOLVENT	8/21/86	500 GAL	AERO TEST
TYPE II SOLVENT	11/20/86	500 GAL	AERO TEST
TYPE II SOLVENT	1/26/87	500 GAL	AERO TEST
TYPE II SOLVENT	4/20/87	500 GAL	AERO TEST
TYPE II SOLVENT	5/12/87	300 GAL	AERO TEST
TYPE II SOLVENT	7/28/87	500 GAL	AERO TEST
TYPE II SOLVENT	12/02/87	300 GAL	I/M TEST
TYPE II SOLVENT	1/12/88	500 GAL	I/M TEST
TYPE II SOLVENT	1/18/88	275 GAL	AERO TEST
TYPE II SOLVENT	3/02/88	500 GAL	I/M TEST
TYPE II SOLVENT	4/07/88	500 GAL	I/M TEST
TYPE II SOLVENT	5/20/88	500 GAL	AERO TEST
TYPE II SOLVENT	7/01/88	500 GAL	AERO TEST
TYPE II SOLVENT	7/21/88	500 GAL	AERO TEST
TYPE II SOLVENT	8/09/88	500 GAL	I/M TEST
TYPE II SOLVENT	9/06/88	500 GAL	AERO TEST
TYPE II SOLVENT	9/13/88	500 GAL	AERO TEST
TYPE II SOLVENT	5/22/89	510 GAL	TEST
TYPE II SOLVENT	7/06/89	500 GAL	AERO TEST
TYPE II SOLVENT	9/29/89	500 GAL	AERO TEST

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
TYPE II SOLVENT	3/09/90	500 GAL	I/M TEST
TYPE II SOLVENT	6/08/90	1000 GAL	TEST
TYPE II SOLVENT	7/19/90	475 GAL	AERO TEST
TYPE III FLUID	2/13/85	10 GAL	TEST
TYPE III FLUID	3/18/85	10 GAL	I/M TEST
TYPE III FLUID	5/16/85	15 GAL	I/M TEST
TYPE III FLUID	7/02/85	15 GAL	I/M TEST
TYPE III FLUID	3/01/88	20 GAL	I/M TEST
TYPE III FLUID	10/17/89	15 GAL	TEST
UNISOL	12/10/87	5 GAL	MAINT.
VACTRA #2	2/28/85	55 GAL	MAINT.
VACTRA #2	3/26/85	55 GAL	MAINT.
VACTRA #2	5/01/85	55 GAL	MAINT.
VACTRA #2	6/04/85	55 GAL	MAINT.
VACTRA #2	8/08/85	55 GAL	MAINT.
VACTRA #2	9/09/85	55 GAL	MAINT.
VACTRA #2	10/07/85	110 GAL	MAINT.
VACTRA #2	11/21/85	55 GAL	MAINT.
VACTRA #2	11/26/85	55 GAL	MAINT.
VACTRA #2	1/17/86	55 GAL	MAINT.
VACTRA #2	9/18/86	55 GAL	MAINT.
VACTRA #2	11/13/86	55 GAL	MAINT.
VACTRA #2	3/17/87	55 GAL	MAINT.
VACTRA #2	5/29/87	55 GAL	MAINT.
VACTRA #2	9/01/87	55 GAL	MAINT.
VACTRA #2	9/30/87	55 GAL	MAINT.
VACTRA #2	11/23/87	55 GAL	MAINT.
VACTRA #2	1/29/88	55 GAL	MAINT.
VACTRA #2	3/11/88	55 GAL	MAINT.
VACTRA #2	4/11/88	55 GAL	MAINT.
VACTRA #2	7/01/88	55 GAL	MAINT.
VACTRA #2	8/29/88	55 GAL	MAINT.
VACTRA #2	10/10/88	55 GAL	MAINT.
VACTRA #2	3/07/89	55 GAL	MAINT.
VACTRA #2	6/29/89	55 GAL	MAINT.
VACTRA #2	8/09/89	55 GAL	MAINT.
VACTRA #2	9/18/89	55 GAL	MAINT.
VACTRA #2	9/27/89	55 GAL	MAINT.
VACTRA #2	3/27/90	55 GAL	MAINT.
VACTRA #2	7/10/90	55 GAL	MAINT.
VACTRA #2	10/04/90	110 GAL	MAINT.
VACTRA #4	9/26/86	5 GAL	MAINT.
VACULINE 1405	3/14/85	30 GAL	MAINT.
VACULINE 1405	9/01/87	25 GAL	MAINT.
VELOCITE #6	2/20/85	15 GAL	MAINT.
VELOCITE #6	3/26/85	15 GAL	MAINT.
VELOCITE #6	6/09/86	15 GAL	MAINT.
VELOCITE #6	9/18/86	15 GAL	MAINT.
VELOCITE #6	7/01/88	10 GAL	MAINT.
VELOCITE #6	10/10/88	20 GAL	MAINT.
VELOCITE #6	9/18/89	10 GAL	MAINT.

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
VELOCITE #6	6/27/90	35 GAL	MAINT.
VF-2 MEDIA	5/03/89	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	1/24/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	3/21/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	6/24/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	9/11/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	7/18/86	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	11/03/86	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	3/16/87	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	8/21/87	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	10/15/87	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	7/29/88	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	9/16/88	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	6/07/90	1000 LB	MACH SHOP
VF-77 CLEANING COMPOUND	1/02/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	4/01/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	7/22/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	10/22/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	1/22/86	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	2/21/86	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	7/18/86	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	3/16/87	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	8/21/87	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	10/15/87	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	5/18/88	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	8/03/88	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	11/09/88	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	9/28/89	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	3/12/90	55 GAL	MACH SHOP
WD-40	11/07/85	144 OUNCES	I/M TEST
WD-40	11/25/85	5 GAL	MIKOLS
WD-40	5/18/87	1 GAL	AGRS
WD-40	10/19/88	5 GAL	MIKOLS
WD-40	9/05/89	9 PINTS	STORES

APPENDIX C

Chemical Disposal Summary

J. C. CARTER COMPANY, INC.
 CHEMICAL DISPOSAL SUMMARY

11/25/90

Page 1

DISPOSAL DATE	DESCRIPTION	QUANTITY DISPOSED
2/04/81	WATER AND OIL	1700 GALLONS
4/08/81	WATER AND OIL	UNKNOWN
6/05/81	WATER AND METHANOL	1800 GALLONS
8/11/81	WATER AND MUD	UNKNOWN
12/16/81	WATER AND JET A FUEL	2000 GALLONS
12/17/81	WATER AND JET A FUEL	400 GALLONS
2/24/82	WATER AND OIL	1900 GALLONS
3/03/82	WATER	1800 GALLONS
3/20/82	WATER AND OIL	2000 GALLONS
4/02/82	OIL	1520 GALLONS
4/08/82	WATER AND OIL	2000 GALLONS
7/30/82	WATER AND OIL	2000 GALLONS
11/10/82	AVIATION FUEL	1860 GALLONS
12/22/82	OIL	340 GALLONS
2/09/83	WATER AND OIL	2000 GALLONS
2/23/83	WATER AND OIL	2000 GALLONS
3/04/83	WASTE WATER	2000 GALLONS
7/14/83	WATER AND JET A FUEL	1025 GALLONS
7/21/83	WATER AND OIL	2000 GALLONS
11/18/83	JET A FUEL	1500 GALLONS
12/22/83	WATER AND OIL	2000 GALLONS
4/30/84	WATER AND OIL	2000 GALLONS
6/06/84	WASTE OIL	1425 GALLONS
7/18/84	WASTE OIL	1200 GALLONS
9/11/84	WATER AND OIL	2000 GALLONS
9/12/84	WASTE OIL	450 GALLONS
12/18/84	WASTE OIL	1350 GALLONS
2/27/85	WATER AND OIL	2000 GALLONS
3/01/85	WASTE OIL	350 GALLONS
5/03/85	WATER AND OIL	1500 GALLONS
5/08/85	WATER AND OIL	100 GALLONS
6/10/85	WASTE OIL	1400 GALLONS
9/17/85	WATER AND OIL	500 GALLONS
9/25/85	WATER AND OIL	5295 GALLONS
11/12/85	WASTE OIL	1300 GALLONS
11/13/85	WATER AND OIL	1000 GALLONS
11/18/85	WASTE OIL	8145 GALLONS
12/02/85	WATER AND OIL	600 GALLONS

CHEMICAL DISPOSAL SUMMARY

11/29/90

Page 2

DISPOSAL DATE	DESCRIPTION	QUANTITY DISPOSED
3/18/86	WATER AND OIL	7090 GALLONS
3/20/86	WASTE COMBUSTIBLE SOLID	2500 POUNDS
6/10/86	WASTE OIL	400 GALLONS
6/16/86	WATER AND OIL	9090 GALLONS
9/25/86	WASTE OIL	1300 GALLONS
10/07/86	WASTE OIL	8895 GALLONS
3/02/87	WATER AND JET A FUEL	1300 GALLONS
3/06/87	WASTE OIL	1320 GALLONS
4/16/87	RECYCLE COOLANT	670 GALLONS
4/20/87	WASTE OIL	2750 GALLONS
11/02/87	RECYCLE COOLANT	450 GALLONS
5/17/88	WASTE OIL	2050 GALLONS
7/22/88	USED TYPE II SOLVENT	400 GALLONS
8/03/88	WASTE OIL	UNKNOWN
8/18/88	RECYCLE COOLANT	700 GALLONS
9/27/88	WASTE OIL AND COOLANT	1000 GALLONS
9/29/88	WATER AND OIL	1200 GALLONS
10/27/88	WASTE OIL	300 GALLONS
12/20/88	USED JET A FUEL	985 GALLONS
1/05/89	WATER AND OIL	4000 GALLONS
5/16/89	WATER AND OIL	1100 GALLONS
10/25/89	WASTE PAINT	100 GALLONS
11/06/89	WASTE OIL, WATER, COOLANT	1800 GALLONS
11/08/89	WATER AND OIL	2800 GALLONS
11/28/89	SODIUM CHLORIDE AND WATER	20 GALLONS
2/08/90	WASTE OIL AND WATER	800 GALLONS
3/15/90	USED SOLVENT	400 GALLONS
4/11/90	USED SOLVENT	700 GALLONS
5/31/90	USED JET A FUEL	800 GALLONS
6/14/90	USED COOLANT	900 GALLONS
7/12/90	WASTE OIL AND WATER	1300 GALLONS
8/08/90	OIL AND WATER	1500 GALLONS
9/13/90	DRUMS/MISC WASTE MATERIAL	9 DRUMS

APPENDIX D

Correspondence Requesting Information on the 1986 Tank Pull
From Consultants and Regulatory Agencies

Snell & Wilmer

LAW OFFICES

P.O. Box 19601
1920 Main Street
Suite 1200
Irvine, California 92714
(714) 253-2700
Fax: (714) 955-2507

Diane R. Smith (714) 253-2720

PHOENIX, ARIZONA

TUCSON, ARIZONA

DIVINE, CALIFORNIA

November 5, 1990

Hekimian & Associates Consulting
Engineers & Environmental Planners
Huntington Pacifica
18377 Beach Boulevard, Suite 212
Huntington Beach, California 92648

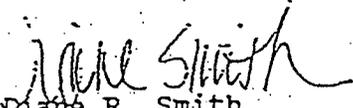
Re: J.C. Carter Company, Inc. Facility, Costa Mesa,
California

Gentlemen:

This firm represents J.C. Carter Company, Inc. It is necessary for us to obtain files in Hekimian & Associates' possession so as to avoid the expense of duplicating existing research performed during the time Hekimian was under contract to J.C. Carter. Specifically, we wish to obtain from your office the files relating to your review of agency records in connection with your site investigation, and any other records which relate to the condition of the property. Would you please have these records delivered to me at the address shown above at your earliest convenience. We very much appreciate your cooperation in this matter. Please call me if there are any questions regarding this request.

Very truly yours,

SNELL & WILMER


Diane R. Smith

DRS/mh

cc: J.C. Carter Company, Inc.
Attention: Gordon Rusk, Vice President
Melodie K. Grace, Esq.
A.L. Simmons
Delta Environmental Consultants, Inc.
Attention: Barbara Mickelson
Michael O'Brien

0201Q

Snell & Wilmer

LAW OFFICES

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Suite 1200
Irvine, California 92714
(714) 253-2700
Fax: (714) 955-2507

Diane R. Smith (714) 253-2720

PHOENIX, ARIZONA

TUCSON, ARIZONA

IRVINE, CALIFORNIA

November 5, 1990

Converse Environmental Consultants
California
Coppertree Business Park
151 Kalmus Drive, Suite H-3
Costa Mesa, California 92626

Re: Project Number 87-42258-01
J.C. Carter Company, Inc. Facility, Costa Mesa,
California

Gentlemen:

This firm represents J.C. Carter Company, Inc. It is necessary for us to obtain files in Converse Environmental Consultants' possession so as to avoid the expense of duplicating existing research performed during the time Converse was under contract to J.C. Carter. Specifically, we wish to obtain from your office the files relating to your review of agency records in connection with your site investigation, as well as any other records which relate to the technical findings contained in your reports. Would you please have these records delivered to me at the address shown above at your earliest convenience. We very much appreciate your cooperation in this matter. Please call me if there are any questions regarding this request.

Very truly yours,

SNELL & WILMER


Diane R. Smith

DRS/mh

cc: J.C. Carter Company, Inc.
Attention: Gordon Rusk, Vice President
Melodie K. Grace, Esq.
A.L. Simmons
Delta Environmental Consultants, Inc.
Attention: Barbara Mickelson
Michael O'Brien

02020

Snell & Wilmer
LAW OFFICES

P.O. Box 19601
1920 Main Street
Suite 1200
Irvine, California 92714
(714) 253-2700
Fax: (714) 955-2507

Diane R. Smith (714) 253-2720

PHOENIX, ARIZONA

TUCSON, ARIZONA

IRVINE, CALIFORNIA

November 5, 1990

Griffin Construction
54712 Cherry Lee Lane
Yorba Linda, California 92686

Attention: Jack Griffin

Re: J.C. Carter Company, Inc. Facility, Costa Mesa,
California

Gentlemen:

It has come to our attention that you may have records relating to a tank which was removed from the J.C. Carter site at 671 West Seventeenth Street, Costa Mesa in 1986. It would be extremely useful to J.C. Carter Company, Inc., which this firm presently represents, if you could make available to us all documents relating to removal of the tank which may be in your possession.

We very much appreciate your cooperation in this matter. If you have any questions, please do not hesitate to contact me at the number shown above. Thank you very much in advance for your anticipated assistance.

Very truly yours,

SNELL & WILMER

Diane R. Smith
Diane R. Smith

DRS/mh

cc: J.C. Carter Company, Inc.
Attention: Gordon Rusk, Vice President
Melodie K. Grace, Esq.
A.L. Simmons
Delta Environmental Consultants, Inc.
Attention: Barbara Mickelson
Michael O'Brien

0203Q

Snell & Wilmer

LAW OFFICES

P.O. Box 19601
1920 Main Street
Suite 1200
Irvine, California 92714
(714) 253-2700
Fax: (714) 955-2507

Diane R. Smith (714) 253-2720

PHOENIX, ARIZONA

TUCSON, ARIZONA

IRVINE, CALIFORNIA

November 5, 1990

Costa Mesa Fire Department
Costa Mesa, California 92628-1200

Re: J.C. Carter Company, Inc. Facility, Costa Mesa,
California

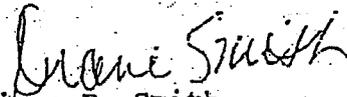
Gentlemen:

It has come to our attention that you may have records relating to a tank which was removed from the J.C. Carter site at 671 West Seventeenth Street, Costa Mesa in 1986. It would be extremely useful to J.C. Carter Company, Inc., which this firm presently represents, if you could make available to us all documents relating to removal of the tank which may be in your possession. We will be happy to pay for copies, or to request these records more formally, if necessary.

We very much appreciate your cooperation in this matter. If you have any questions, please do not hesitate to contact me at the number shown above. Thank you very much in advance for your anticipated assistance.

Very truly yours,

SNELL & WILMER


Diane R. Smith

DRS/mh

cc: J.C. Carter Company, Inc.
Attention: Gordon Rusk, Vice President
Melodie K. Grace, Esq.
A.L. Simmons
Delta Environmental Consultants, Inc.
Attention: Barbara Mickelson
Michael O'Brien

0204Q

Snell & Wilmer
LAW OFFICES

P.O. Box 19601
1920 Main Street
Suite 1200
Irvine, California 92714
(714) 253-2700
Fax: (714) 955-2507

Diane R. Smith (714) 253-2720

NOV 9 1990

PHOENIX, ARIZONA

TUCSON, ARIZONA

IRVINE, CALIFORNIA

November 5, 1990

County of Orange
Health Care Agency
P.O. Box 355
Santa Ana, California 92702

Re: J.C. Carter Company, Inc. Facility, Costa Mesa,
California

Gentlemen:

It has come to our attention that you may have records relating to a tank which was removed from the J.C. Carter site at 671 West Seventeenth Street, Costa Mesa in 1986. It would be extremely useful to J.C. Carter Company, Inc., which this firm presently represents, if you could make available to us all documents which may be in your possession relating to removal of the tank. We will be happy to pay the cost of copying, or to request the records more formally, if necessary.

We very much appreciate your cooperation in this matter. If you have any questions, please do not hesitate to contact me at the number shown above. Thank you very much in advance for your anticipated assistance.

Very truly yours,

SNELL & WILMER


Diane R. Smith

DRS/mh

cc: J.C. Carter Company, Inc.
Attention: Gordon Rusk, Vice President
Melodie K. Grace, Esq.
A.L. Simmons
Delta Environmental Consultants, Inc.
Attention: Barbara Mickelson
Michael O'Brien

0205Q

Snell & Wilmer

LAW OFFICES

P.O. Box 19601
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Suite 1200
Irvine, California 92714
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Fax: (714) 955-2507

Diane R. Smith (714) 253-2720

PHOENIX, ARIZONA

TUCSON, ARIZONA

IRVINE, CALIFORNIA

November 5, 1990

Schaefer Dixon Associates
22 Mauchly
Irvine, California 92718

Re: 9R4392B - J.C. Carter Company, Inc. Facility, Costa
Mesa, California

Gentlemen:

This firm represents J.C. Carter Company, Inc. It is necessary for us to obtain files in Schaefer Dixon's possession so as to avoid the expense of duplicating existing research performed during the time Schaefer Dixon was under contract to J.C. Carter. Specifically, we wish to obtain from your office the files relating to your review of agency records in connection with your site investigation, and any other records which relate to the condition of the property. Would you please have these records delivered to me at the address shown above at your earliest convenience. We very much appreciate your cooperation in this matter. Please call me if there are any questions regarding this request.

Very truly yours,

SNELL & WILMER

Diane R. Smith
Diane R. Smith

DRS/mh

cc: J.C. Carter Company, Inc.
Attention: Gordon Rusk, Vice President
Melodie K. Grace, Esq.
A.L. Simmons
Delta Environmental Consultants, Inc.
Attention: Barbara Mickelson
Michael O'Brien

0200Q

COSTA MESA FIRE DEPARTMENT
APPLICATION FOR PERMIT

PERMIT FEE: \$15.00. Make checks payable to City of Costa Mesa. This application and fee should be mailed or brought to the Finance Department (Room 106, City Hall, 77 Fair Drive), P. O. Box 1200, Costa Mesa, CA 92626.

Capt Swanson
548-8513

Business Name ITA Corp

Mailing Address 171 W. ...

Permit Address (if different) Same

Person to Contact Arthur ... Phone 714-...

Description of Type of Business: Auto Shop

Are Other Fire Department Permits In Effect for Premises? If so, list numbers.
None

Section(s) of Fire Code Requiring Permit(s). (See Permit Requirements)

Describe what is to be done and list all hazardous materials and the maximum quantities to be on hand.

Work on 757 ...
...
...
...

Date: 7/18/85 Applicant's Signature [Signature]

Fire Department Use Only

Place of Assembly Occupant Load

Building Construction Suitable for Occupancy

CLIENT'S COPY

ORANGE COUNTY HEALTH CARE AGENCY
HEALTH SERVICES ORDER

1. No. 010959

2. DATE: 2-12-86

TELEPHONE #

(Please Print or Type)

3. CLIENT NAME: J. C. CARTER CO.

TELEPHONE #

4. PAYOR'S NAME: GRIFFIN LINDA CO.

TELEPHONE #

STREET: 1071 W. 17th St.

CITY, STATE, ZIP CODE: COSTA MESA

STREET: 5472 HERBY LEE LANE

CITY, STATE, ZIP CODE: COSTA MESA

5. CLIENT #

6. NEW CLIENT RETURNING CLIENT

7. REPORTING UNIT: HAZ WASTE

8. CASHIER'S USE ONLY:

9. PRINT, PREPARER'S NAME: NN CK # 2136

10. Write in Code # for Service(s): Write in amount if variable fee:

CODE #	CHECK	CASH	AMOUNT
213	253	-	\$
TOTAL COST	AMOUNT PAID		AMOUNT TO BE BILLED
	53		

11. BATCH # 12. INVOICE #

13. PLAN CHECK NUMBER: 26-075

14. ACCOUNTING INFORMATION:

15. CASHIER'S INITIALS OR SIGNATURE:

16. COMMENTS:

Remove 1 TANK

17. SUPERVISOR'S SIGNATURE IF REFUND:

18. SIGNATURE OF PERSON RECEIVING REFUND:

SECRET
NO FORN DISSEM
19

California Regional Water Quality Control Board
Santa Ana Region

Cleanup and Abatement Order No. 90-126

for

J.C. Carter Company, Inc.

Costa Mesa

Orange County

The California Regional Water Quality Control Board, Santa Ana Region (hereinafter Board), finds that:

1. J.C. Carter Company, Inc. (hereinafter J.C. Carter), owns property and a manufacturing facility located at 671 W. Seventeenth Street in the City of Costa Mesa, Orange County. The location of this property is shown on Attachment "A" which is made a part of this order. This facility has been in existence since the mid-1950's under several previous owners. On October 1, 1986, the J.C. Carter Acquisition Corporation took over the operation and maintenance of this facility (although legal ownership occurred on January 22, 1987). On January 26, 1987, J.C. Carter Acquisition changed name to J.C. Carter Company, Inc.
2. On March 19, 1986, Orange County Health Care Agency (hereinafter OCHCA) staff conducted an inspection and field tests during the removal of a 500-gallon cutting oil underground storage tank reported to have contained waste cutting and grinding oil. According to information provided by OCHCA hazardous waste inspectors, other industrial wastes may have also been stored in the former cutting oil tank. Analytical results of soil samples collected at that time revealed soil contamination and confirmed leakage from the underground tank. By letters dated May 15 and August 11, 1986, OCHCA required further site assessment and a mitigation plan for the contaminated soil. Further site characterization included the installation of five soil borings. Soil analyses revealed total recoverable petroleum hydrocarbon (TRPH) contamination, and the presence of benzene and xylene.
3. In February 1987, a report prepared by the project consultant, Hekimian and Associates, Inc., recommended that some of the soil contaminated by cutting oil be left in place. By letters dated April 20 and August 11, 1987, OCHCA found the investigation report and cleanup recommendations to be inadequate and required further investigation as well as mitigation of the contaminated soil.

4. In December 1987, J.C. Carter conducted further investigation which included two additional borings (B-6 and B-7) by a new project consultant, Converse Environmental Consultants California. A groundwater sample was collected from B-7 through the auger stem. Soil and groundwater samples revealed moderately high concentrations of chlorinated (trichloroethene, tetrachloroethene, and trans-1,2,-dichloroethene) and total recoverable petroleum hydrocarbon (TRPH) contamination.
5. By a letter dated March 17, 1988, Regional Board staff required further investigation to characterize the extent of groundwater contamination. On May 20, 1988, a work plan for further site assessment was submitted by a new project consultant, Schaefer Dixon Associates. This investigation included the installation of three monitoring wells (MW-1 through MW-3). A plot plan of the facility and the location of these monitoring wells are shown on Figure 1. Groundwater analyses revealed elevated concentrations of chlorinated hydrocarbons and TRPH contamination. This investigation revealed a groundwater depth of approximately 30 feet below the surface and a groundwater gradient direction toward the southeast. In addition, the investigation revealed the presence of a silty clay layer encountered approximately 50 feet below ground surface. Based on data presented to date, it is unclear whether this clay layer has restricted the vertical migration of the contaminants.
6. By a letter dated November 14, 1988, Regional Board staff required J.C. Carter to submit a work plan and time schedule for further site assessment by December 15, 1988. On January 5, 1989, the project consultant requested a two-week extension and the work plan was submitted on February 8, 1989. On February 21, 1989, Regional Board staff approved the work plan. This site investigation included the installation of two additional upgradient monitoring wells (MW-4 and MW-5). Based on a report dated May 1, 1989, these monitoring wells indicated low concentrations of chlorinated and petroleum hydrocarbons.
7. By a letter dated September 1, 1989, Regional Board staff required further site assessment to fully characterize the lateral and vertical extent of chlorinated hydrocarbon contamination at both on-site and any affected off-site areas and required the submittal of a work plan by September 29, 1989. On October 5, 1989, an incomplete work plan and time schedule was submitted. By a letter dated October 13, 1989, Regional Board required that a revised work plan be submitted