

- Lead was not detected at concentrations above the remediation criterion of 800 mg/kg in the four samples analyzed from the two borings. Lead concentrations ranged up to 7.95 mg/kg. Results of lead analyses are summarized in Table 9 and shown on Figure 8-11.
- VOCs were not detected at concentrations above MDLs in the two samples analyzed from the well boring. Results of VOC analyses are summarized in Table 10 and shown on Figure 9-2.

Summary of Soil Gas Sampling and Analysis

- Soil gas was collected at 10 and 18 feet bgs in boring location DP0096 and at 10 feet and 20 feet bgs in boring DP0097. A summary of soil gas sampling and analysis for the AOI is shown in Table 5.
- VOCs in soil gas were not detected at concentrations above remediation criteria. Results of VOC analyses are summarized in Table 12 and shown on Figure 8-3. The maximum concentrations of VOCs detected are listed below for the depths of less than 15 feet bgs for which remediation criteria were developed, and depths of 15 feet bgs and deeper.

VOC Soil Gas Compounds Less than 15 feet bgs	Boring Number	Sample Depth (feet bgs)	Maximum Concentration ($\mu\text{g}/\text{m}^3$)
1,2,3-Trichlorobenzene	DP0096	10	190
Chloroform	DP0097	10	23
Ethylbenzene	DP0096	10	150
CFC-11	DP0097	10	12,700

VOC Soil Gas Compounds 15 feet bgs and Deeper	Boring Number	Sample Depth (feet bgs)	Maximum Concentration ($\mu\text{g}/\text{m}^3$)
1,1,1-TCA	DP0097	20	146
1,1-DCE	DP0097	20	17.5
1,2,3-Trichlorobenzene	DP0096	18	60
1,2,4-Trimethylbenzene	DP0097	20	55
Freon-114	DP0097	20	651
1,3,5-Trimethylbenzene	DP0097	20	17.9
4-Ethyltoluene	DP0097	20	21.5
4-Methyl-2-pentanone	DP0097	20	17.3
Benzene	DP0097	20	19
Chloroform	DP0097	20	240
Ethylbenzene	DP0097	20	95.5
m,p-Xylenes	DP0097	20	375
o-Xylene	DP0097	20	90.2
Styrene	DP0097	20	98.6
PCE	DP0097	20	26.5
Toluene	DP0097	20	343
CFC-11	DP0097	20	920

AOI 47 Summary: Reported concentrations of COPCs were less than the remediation criteria in the samples analyzed. Therefore, no further soil sampling is recommended. However, the basin concrete should be sampled and tested as appropriate and disposed in accordance with the closure plan approved by the DTSC for the waster water treatment unit.

6.5.22 Railroad Tracks – AOI 48

AOI Description: The Railroad Tracks area was located along the west side of the Main Production Building and extended from near the south end of the Main Production Building approximately 1,400 feet north to the main railroad line. The AOI is shown on Figure 2.

Previous Investigation History: Six soil borings (SB-15 through SB-17, SB-21, SB-25 and SB-26) were advanced by CRA in 2004 along the rail road spur. Three samples were collected from each boring at 0, 1 and 2 feet bgs and analyzed for lead. Lead was detected above the remediation criterion of 800 mg/kg in four samples spread throughout the length of the area sampled with reported maximum concentration of 63,500 mg/kg.

CCR Investigation Summary: To assess potential impacts from historical uses, 122 borings were advanced to multiple depths down to 5 feet bgs. Soil samples collected were analyzed for one or more of the following: lead, CAM-17 metals, TPH, PCBs, VOCs, SVOCs, and PAHs. Soil gas samples were not collected because VOCs were not considered to be chemicals of concern at this location.

FI Field Program Summary: To further assess potential lead and arsenic impacts 23 additional borings were advanced to 4 feet bgs and analyzed for lead, and 14 samples were analyzed for arsenic. Boring locations are shown on Figure 4.

Summary of Soil Sampling and Analysis

- Soil samples were collected and analyzed at multiple near-surface depths of up to 5 feet bgs for one or more of the following compounds: lead, arsenic, CAM-17 metals, TPH, PCBs, VOCs, SVOCs, and PAHs. A summary of sampling and analysis for the AOI is shown in Table 4.
- CAM-17 metals were analyzed for on 15 samples and arsenic analysis was performed on an additional 6 samples. Concentrations of antimony and arsenic were over the remediation criteria in six and nine samples, respectively. Results of metals analyses are summarized in Table 10, except lead, and shown on Figures 8-8 and 8-9. The maximum concentrations of metals of concern are listed below.

Metal Compounds	Boring Number	Sample Depth (feet bgs)	Maximum Concentration (mg/kg)
Antimony	XR0182	5	2,720* (54.5)
Arsenic	XR0182	5	1,220* (9.05)
Cadmium	XR0182	5	2.25J
Chromium	XR0182	5	28.3
Mercury	XR0182	5	1.04

Molybdenum	XR0182	5	11.1
Zinc	XR0182	5	585

* Exceeded the remediation criterion indicated in parentheses.

- TPH carbon chain analysis was performed on twelve samples. Seven samples had TPH reported above MDLs with concentrations ranging up to 4,280 mg/kg in sample XR0181 at 1 foot bgs. The majority of hydrocarbons were in the heavy hydrocarbon ranges (C23-C40). Results of TPH analyses are summarized in Table 10.
- PCBs analyses were performed on 52 samples. Thirty-nine (39) samples had concentrations above the MDLs with a maximum reported concentration of 139 mg/kg in XR0182 at 5 feet bgs. Thirteen samples were above the remediation criterion for PCBs. Results of a PCB analyses are shown on Table 10, and on Figures 8-8 and 8-9.
- VOCs were not detected at concentrations above the MDLs in the 12 soil samples analyzed. Results of VOC analyses are summarized in Table 10 and shown on Figure 9-2.
- Fourteen PAHs were detected in the 12 samples analyzed. Six samples had at least one PAH reported at concentrations above the remediation criteria. Results of PAH analyses are summarized in Table 10 and shown on Figures 8-8 and 8-9. The PAHs detected and their maximum concentrations are listed below.

PAH Compounds	Boring Number	Sample Depth (feet bgs)	Maximum Concentration (mg/kg)
Acenaphthene	XR0181	1	13
Anthracene	XR0181	1	24.3
Benzo(a)anthracene	XR0181	1	21.5* (0.125)
Benzo(a)pyrene	XR0181	1	24.1* (0.125)
Benzo(b)fluoranthene	XR0181	1	29.8* (0.125)
Benzo(g,h,i)perylene	XR0181	1	36.6
Benzo(k)fluoranthene	XR0181	1	15.3* (0.125)
Chrysene	XR0181	1	49.7* (0.125)
Fluoranthene	XR0181	1	151
Fluorene	XR0181	1	12.6
Indeno(1,2,3-cd) pyrene	XR0181	1	26.3* (0.125)
Naphthalene	XR0181	1	2.85* (0.174)
Phenanthrene	XR0181	1	128
Pyrene	XR0181	1	95.1

* Exceeded the remediation criterion indicated in parentheses.

- SVOC analyses were performed on 12 samples. Nineteen (19) compounds were detected above MDL. One sample (XR0181) had concentrations of seven SVOCs reported above the remediation criteria. Three samples had at least one SVOC above the remediation criterion. Results of SVOC analyses are summarized in Table 10 and shown on Figures 8-8 and 8-9. The SVOCs detected and their maximum concentrations are listed below.

SVOC Compounds	Boring Number	Sample Depth (feet bgs)	Maximum Concentration (mg/kg)
2-Methylnaphthalene	XR0182	5	0.289 J
Acenaphthene	XR0181	1	2.79
Accenaphthylene	XR0181	1	3.78
Anthracene	XR0181	1	7.8
Benzo(a)anthracene	XR0181	1	8.69* (0.125)
Benzo(a)pyrene	XR0181	1	6.73* (0.125)
Benzo(b)fluoranthene	XR0181	1	15.9* (0.125)
Benzo(g,h,i)perylene	XR0181	1	5.02
Benzo(k)fluoranthene	XR0181	1	5.44* (0.125)
Bis(2-Ethylhexyl)phthalate	XR0182	5	0.33 J
Chrysene	XR0181	1	10.8* (0.125)
Dibenzofuran	XR0181	1	3.25
Di-n-butylphthalate	XR0182	5	0.32 J
Fluoranthene	XR0181	1	24
Fluorene	XR0181	1	3.47
Indeno(1,2,3-cd)pyrene	XR0181	1	4.88* (0.125)
Naphthalene	XR0181	1	1.33 J* (0.174)
Phenanthrene	XR0181	1	19.3
Pyrene	XR0181	1	20.3

* Exceeded the remediation criterion indicated in parentheses.

- Three-hundred-thirty-eight soil samples were collected from 122 locations and analyzed for lead by XRF or EPA Method 6010B including 136 samples by EPA method 6010B and 202 samples by XRF. An additional 22 samples were analyzed by EPA method 6010B to confirmation XRF results. Results of lead analyses are summarized in Table 9 and shown on Figures 8-8 and 8-9 and cross-section Figure 11-13. Reported concentrations of lead exceeded remediation criterion of 800 mg/kg in 84 samples. Results of lead analyses are summarized in Table 9 and shown on Figures 8-8 and 8-9. Information regarding the range of lead concentrations detected at each sample depth is presented below for both XRF and 6010B data.
 - One hundred and forty-six soil samples were collected and analyzed for lead from the ground surface (0-0.3 feet bgs). Forty samples were over the remediation criterion for lead with a maximum reported concentration of 643,891 mg/kg in XR0104.
 - Forty-seven samples were collected and analyzed for lead from 0.5 feet bgs. Nine samples were over the remediation criterion for lead with a maximum reported lead concentration of 296,960 mg/kg in XR0098.
 - Seventy-nine samples were collected and analyzed for lead from at 1 foot bgs. Fourteen samples were over the remediation criterion with a maximum reported lead concentration of 43,980 mg/kg in XR0100.

- Fifteen samples were collected and analyzed for lead from 1.5 feet bgs. Four samples were over the remediation criterion with a maximum reported lead concentration of 10,694 mg/kg in XR0075.
- Seventeen samples were collected and analyzed for lead from 2 feet bgs. No samples had reported concentrations over the remediation criterion of 800 mg/kg and the maximum reported lead concentration was 767 mg/kg in XR0093.
- Twenty-one samples were collected and analyzed at 2.5 feet bgs. Thirteen samples were over the remediation criterion with a reported maximum lead concentration of 190,976 mg/kg in XR0110.
- Fourteen samples were collected and analyzed at 3 feet bgs to 10 feet bgs. Three samples were over the remediation criterion with a maximum reported lead concentration of 62,000 mg/kg in XR0182 at 5 feet bgs.

AOI 48 Summary: The analytical data indicates that the most impacted area of the railroad tracks is the area along the Main Production Building adjacent to the red lead shed (AOI 40). The data also indicate the concentrations of PAHs, PCBs, arsenic, and antimony generally attenuate vertically within the upper two feet of soil, although some localized areas may have deeper impacts. In addition, lateral migration in this area was very limited due to it being bounded by footings and walls on both sides. Impacts on the northern part of the railroad spur are also shallow and delineated. Impacts along the northern portion of the railroad spur are relatively confined to low lying areas on the east side of the tracks where possibly lead dust from rail cars may have been transported by wind and runoff. Limited confirmation sampling is recommended during remediation activities to confirm removal of soil with lead and other impacts above remediation criteria.

6.5.23 Grass Strip Area North of North Driveway – AOI 49

AOI Description: The Grass Strip Area North of North Driveway is located in the perimeter area north of the north driveway on the north side of the Main Production Building. The AOI is shown on Figure 2.

Previous Investigation History: Five soil borings (SB-10 through SB-14) were advanced by CRA in 2004 in this area. Three samples were collected from each boring at 0, 1 and 2 feet bgs and analyzed for lead. Lead was detected above the remediation criterion of 800 mg/kg in three samples collected at 0 foot bgs. Maximum concentration detected at 0 foot bgs was 8,480 mg/kg, 1 foot bgs 14.2 mg/kg, and 2 feet bgs 16.5 mg/kg.

CCR Investigation Summary: To assess potential impacts of lead from historical uses, 33 soil samples were collected at 17 locations and analyzed for lead by XRF and by EPA method 6010B. Boring locations are shown on Figure 4. Lead exceeded remediation criterion of 800 mg/kg in 20 samples. Information regarding the range of lead concentrations detected at each sample depth is presented below.

FI Field Program Summary: No additional sampling was performed as part of the FI program because the data from the CCI was sufficient to adequately determine the extent of impacts in this area.

Summary of Soil Sampling and Analysis

- Analytical results for lead exceeded the remediation criterion of 800 mg/kg in 20 samples with a maximum reported concentration of 26,393 mg/kg in DP0004 at 0 foot bgs. Results of lead analyses are summarized in Table 9 and shown on Figure 8-10 and cross-section Figure 11-14.
- Seventeen soil samples were collected and analyzed from the ground surface (0 – 0.3 feet bgs). All 17 soil samples were over the remediation criterion with a reported maximum concentration of 26,393 mg/kg in XR0004.
- Six samples were collected and analyzed at 0.5 feet bgs. Three samples were over the remediation criterion with a reported maximum lead concentration of 5,907 mg/kg in XR0010.
- Ten samples were collected and analyzed at 1 foot bgs for lead. Lead was not detected at concentrations above the remediation criterion with a reported maximum concentration of 591 mg/kg in XR0005.

AOI 49 Summary: Review of the analytical data indicates that lead concentrations typically attenuate to below the remediation criterion of 800 mg/kg by 0.5 feet bgs but that some localized areas may have lead concentrations above the remediation criterion to a depth of 1 foot bgs or more. The existing data is sufficient to delineate the extent of lead impacts and the adjacent areas are bounded by paved surfaces. Therefore, no further soil sampling is recommended except for limited confirmation sampling during remediation removals to confirm removal of lead impacts above remediation criteria.

6.5.24 North End of East Grass Area – AOI 50

AOI Description: The North End of East Grass Area is located east of the northwest part of the former Main Production Building. The AOI is shown on Figure 2.

Previous Investigation History: Seven soil borings (SB-1 through SB-7) were advanced by CRA in 2004 in the lawn area east of the Main Production Building. Three samples were collected from each boring at 0, 1 and 2 feet bgs and analyzed for lead. Lead was not detected above the remediation criterion of 800 mg/kg with a reported maximum concentration of 538 mg/kg.

CCR Investigation Summary: Sixty-one soil samples were collected at 22 locations and analyzed for lead by XRF or EPA method 6010B. Lead exceeded the remediation criterion of 800 mg/kg in 36 samples. Information regarding the range of lead concentrations detected at each sample depth is presented below.

FI Field Program Summary: Seventy samples were collected from 23 borings locations that were advanced to 4 feet bgs. Samples were analyzed for lead by EPA method 6010B to further assess potential lead impacts

Summary of Soil Sampling and Analysis

- Analytical results for lead exceeded the remediation criterion of 800 mg/kg in 15 samples with a maximum reported concentration of 4,419 mg/kg in XR0039 at 0 foot bgs. Results of lead analyses are summarized in Table 9 and shown on Figure 8-11 and cross-section Figure 11-15.
- Forty-five soil samples were collected and analyzed from the ground the surface (0-0.3 feet bgs). Nine samples were over the remediation criterion and the reported maximum concentration was 4,419 mg/kg in XR0039.
- Thirty samples were collected and analyzed at 0.5 feet bgs. Four samples were over the remediation criterion and the reported maximum concentration was 2,720 mg/kg in XR0039.
- Forty-one samples were collected and analyzed at 1 foot to 1.5 feet bgs. Two samples were over the remediation criterion and the reported maximum concentration was 1,069.6 mg/kg in XR0039.

AOI 50 Summary: The analytical results of the samples analyzed indicate that lead impacts to soil are limited to the upper 2 feet of soil and occur primarily next to the side walks. Likely the elevated concentrations along the sidewalks is due to lead dust being tracked out of the building onto the side walk and then being washed and or blown on to the adjacent lawn. Analytical data is sufficient to delineate the approximate extent of impacts. Therefore, no further soil sampling is recommended except for confirmation sampling during remediation to confirm removal of lead impacts above remediation criteria.

6.5.25 South End of East Grass Area – AOI 51

This AOI is discussed with AOI 46 in Section 6.5.20.

6.5.26 Grass Area in Southeast Corner – AOI 52

AOI Description: The Grass Area in the southeast corner is located in the southeast corner of the property. The area is approximately 130 feet by 130 feet and bounded by the paved driveway on the north, the wastewater basin on the west, adjacent property on the south and the Magnolia Avenue sidewalk on the east. The AOI is shown on Figure 2.

Previous Investigation History: One soil boring (SB-9) was advanced by CRA in 2004 in the lawn area in the south east corner of the property. Three samples were collected from the boring at 0, 1, and 2 feet bgs and analyzed for lead. Lead was not detected above the remediation criterion of 800 mg/kg with a reported maximum concentration of 600 mg/kg.

CCR Investigation Summary: To assess potential lead impacts from historical uses, 38 soil samples were collected at 17 locations and analyzed for lead by XRF and/or EPA method 6010B. Boring locations are shown on Figure 4. Lead exceeded remediation criterion of 800 mg/kg in 14 samples. Information regarding the lead concentrations detected at each sample depth is presented below.

FI Field Program Summary: No additional sampling was performed as part of the FI program because the chemical concentrations detected during CCI program are sufficient to delineate the approximate extent of impacts in the AOI.

Summary of Soil Sampling and Analysis

- Analytical results for lead exceeded the remediation criterion of 800 mg/kg in 14 samples with a maximum reported concentration of 6,269 mg/kg in XR0063 at 0.5 feet bgs. Results of lead analyses are summarized in Table 9 and shown on Figure 8-11 and cross-section Figure 11-17.
- Seventeen soil samples were collected from the ground surface (0-0.3 feet bgs) and analyzed for lead. Lead concentrations were over the remediation criterion in five samples with a reported maximum concentration of 3,507 mg/kg in XR0068.
- Five samples were collected at 0.5 feet bgs and analyzed for lead. Lead concentrations were over the remediation criterion in four samples with a reported maximum concentration of 5,610 mg/kg in XR0068.
- Ten samples were collected at 1 foot bgs and analyzed for lead. Lead concentrations were over the remediation criterion in three samples with a reported maximum concentration of 3,169 mg/kg in XR0063.
- Two samples were collected at 1.5 feet bgs and analyzed for lead. Lead concentrations were over the remediation criterion in both samples with a reported maximum concentration of 6,269 mg/kg in XR0063.
- Two samples were collected at 2 feet bgs and analyzed for lead. Lead concentrations were below the remediation criterion with a reported maximum concentration of 207 mg/kg in XR0068.
- Two samples were collected at 2.5 feet bgs and analyzed for lead. Lead concentrations were below the remediation criterion with a reported maximum concentration of 75 mg/kg in XR0063.

AOI 52 Summary: Review of the analytical data of soil samples collected indicates that lead concentrations attenuate by 2 feet bgs in the soil samples analyzed. Analytical data is sufficient to delineate the approximate extent of impacts. Therefore, no further soil sampling is recommended except for confirmation sampling during remediation to confirm removal of lead impacts above remediation criteria.

6.5.27 Groundwater - AOI 53

AOI Description: Groundwater is present beneath the entire site at a depth of approximately 27 to 29 feet bgs. Based on data collected, this shallow groundwater is believed to flow west-southwest. This AOI is also considered to extend offsite to the west to properties on the 1100 to 1200 block of North Knollwood Circle. Monitoring well locations are shown on Figure 5.

Previous Investigation History: Previous investigations focused on specific areas at the Site (e.g., the former UST locations, hazardous waste storage, plate pasting, old charge floor, new battery charging floor, acid storage, storm water retention basin,

and groundwater). A brief summary of these investigations is provided in Section 3 of this report. Temporary well locations were advanced and sampled by Levine-Fricke (TW-1 through TW-8) to assess the potential for site-wide groundwater impacts are shown on Figures 12 and 13. This investigation detected low levels of VOCs in groundwater. Elevated metals concentrations were also reported in the initial round of sample testing. However, it was determined by the consultant (LFR) that the initial round of groundwater samples were not properly filtered, and therefore, the analytical results were elevated and considered invalid.

CCR Investigation Summary: Groundwater was collected during two sampling events performed for this investigation. The first event occurred on 16 August 2005 and included collection of samples from each of the four monitoring wells installed onsite for the CCI (MW-1 through MW-4). Monitoring well locations are shown on Figure 5. A second sampling event occurred on 18 October and 28 October 2005 and included six groundwater grab sample locations along the west side of the north end of Warehouse No. 3 to evaluate potential soil and soil gas VOC impacts to groundwater beneath AOI 26. These samples were analyzed for VOCs.

FI Field Program Summary: During this investigation, additional wells were installed (MW-5 through MW-11) and grab samples collected to further assess groundwater conditions at the west-central part of the site as well as and offsite. Well MW-8 was completed as a dual zone well with one casing completed approximately 45 to 50 feet into the aquifer to evaluate groundwater quality at depth in the aquifer. Results of groundwater samples from these permanent wells supersede the screening results obtained from grab samples in these locations (DP0153, DP0191, DP0195, DP0198, DP0216, and DP0217). Wells MW-10 and MW-11 were installed offsite on North Knollwood Circle. Groundwater samples were collected during three sampling events. Monitoring wells MW-5 through MW-9 were sampled on 3 February 2006, wells MW-10 and MW-11 were sampled on 17 July 2006, and five groundwater grab sample locations on Knollwood Circle were collected on 1 September 2006. Two of the offsite grab sample locations had samples collected from deeper within the aquifer, at 48 and 50 feet bgs. Samples collected from the three events were analyzed for VOCs. Results of groundwater analyses are summarized in Table 13. VOCs are shown on Figure 12, and metals, SVOCs, and PCBs are shown on Figure 13.

- Based on the on the depth-to-groundwater measured in monitoring wells MW-1 through MW-11 during the 3 August 2006 groundwater sampling event, elevation contours, flow direction and gradient were estimated. The groundwater is estimated to be at an elevation of approximately 64.79 to 65.54 feet AMSL with a flow direction to the west-southwest at a gradient of approximately 0.00083 feet/feet as shown on Figure 6. This flow direction and gradient are consistent with the reported direction of groundwater flow for this area.
- **CAM-17 Metals** – Metals analysis was performed on samples from four monitoring wells (MW-1 to MW-4) collected during the 16 August 2005 sampling event and five metals were detected above MDLs. Additionally, four grab samples collected during the October 2005 sampling event were analyzed. The maximum reported concentrations of metals did not exceed their MCLs during either of the two sampling events. Results of metals analyses are summarized in Table 13. Monitoring well results are shown in Figure 13. Results of metals analyses are summarized in Table 13. The maximum concentrations of reported metals for monitoring wells and grab samples are summarized in separate tables below.

Metal Compounds in Grab Samples	Boring Number	Date (m/d/y)	Sample Depth (feet bgs)	Maximum Concentration (mg/L)
Barium	DP0191	10/18/05	30	0.087 (1)
Copper	DP0198	10/18/05	30	0.016J (1.3)
Nickel	DP0195	10/18/05	30	0.019 (0.1)
Zinc	DP0198	10/18/05	30	0.141 (5)

Values in parenthesis indicate MCLs

NA=no MCL for that compound

Metal Compounds in Monitoring Wells	Boring Number	Date (m/d/y)	Sample Depth (feet bgs)	Maximum Concentration (mg/L)
Barium	MW-3	8/16/05	30	0.102 (1)
Molybdenum	MW-1	8/15/05	30	0.0702 (NA)
Selenium	MW-4	8/16/05	30	0.0232 (0.05)
Vanadium	MW-1	8/16/05	30	0.00555 (NA)
Zinc	MW-1	8/16/05	30	0.0281 (5)

Values in parenthesis indicate MCLs

NA=no MCL for that compound

- **PCBs** – PCBs were not detected at concentrations above MDLs in the four grab samples collected and analyzed during the October 2005 sampling event. Based on the reported absence of PCBs in the grab samples, PCBs were not analyzed for in any monitoring well samples. Results of PCB analyses are summarized in Table 13. Monitoring well results are shown in Figure 13.
- **SVOCs** – SVOCs were not detected at concentrations above the MDLs in the one grab sample collected and analyzed during the 18 October 2005 sampling event. Based on the reported absence of SVOCs in the grab sample, SVOCs were not analyzed in any monitoring well samples. Results of SVOC analyses are summarized in Table 13.
- **VOCs** - VOCs were analyzed in 13 grab samples collected during the October 2005 and 1 September 2006 sampling events. Twelve monitoring well samples were collected during the three events on 16 August 2005, 3 February 2006, and 17 July 2006. Results of VOC analyses are summarized in Table 13. Monitoring well results are shown in Figure 12. The acetone reported is likely a laboratory contaminant. The maximum concentrations of the reported VOCs for monitoring well samples and grab samples collected for screening purposes, where permanent monitoring wells have not been installed, are summarized in separate tables below.

VOC Compounds in Monitoring Wells	Monitoring Well	Date (m/d/y)	Sample Depth (feet bgs)	Maximum Concentration ($\mu\text{g/L}$)
1,1,2-TCA	MW-8	2/3/06	30	3.4
1,1-DCA	MW-8	2/3/06	30	34* (5)
1,1-DCE	MW-8	2/3/06	30	110* (6)
1,2-DCA	MW-8	2/3/06	30	1.4* (0.50)
Acetone	MW-8D	2/3/06	75	23 (NA)
Bromodichloromethane	MW-1	8/16/05	30	1.8 (NA)
Chloroform	MW-1	8/16/05	30	2 (NA)
Dibromochloromethane	MW-1	8/16/05	30	1.6 (100)
PCE	MW-10	7/17/06	30	0.7 J (5)

* Exceeded MCLs in parenthesis.

NA=no MCL for that compound

VOC Compounds in Grab Samples Collected Offsite for Screening Purposes	Boring Number	Date (m/d/y)	Sample Depth (feet bgs)	Maximum Concentration ($\mu\text{g/L}$)
1,1,2-TCA	HP0002	9/1/2006	50	1.7 (5)
1,1-DCA	HP0002	9/1/2006	50	36.6* (5)
1,1-DCE	HP0002	9/1/2006	50	163* (6)
1,2-DCA	HP0002	9/1/2006	50	1.4* (0.50)
PCE	HP0005	9/1/2006	30	0.9 J (5)

* Exceeded MCLs in parenthesis.

- MCLs were exceeded in eight grab sample locations and seven monitoring wells collected during the 2005 and 2006 investigation.
- Maximum concentrations of the VOCs detected exceeded the MCL for seven of the ten VOCs detected in grab samples and three of nine VOCs detected in monitoring well samples.
- A comparison of the grab sample results from the October 2005 sampling event with the monitoring well sample results from the February 2006 sampling event, both of which are from the west side of the Site, indicates that the results of well samples are much lower than concentrations in grab samples. Figure 12 shows grab sample point DP0217 where 1,1-DCE was reported at a concentration of 694 $\mu\text{g/L}$ (maximum grab sample concentration) while the sample from well MW-8 at the same location had only 110 $\mu\text{g/L}$ of 1,1-DCE. Grab samples points DP0191 and DP0195, in the vicinity of well MW-7, had reported 1,1-DCE concentrations of 227 to 525 $\mu\text{g/L}$ while subsequent samples from the permanent wells installed at these location (wells MW-6 and MW-7) had only 12 to 29 $\mu\text{g/L}$. This suggests that the well sample results may have 6-18x decrease in concentrations of VOCs from grab samples. If this ratio holds true for the offsite points, then the results of a monitoring well sample from point HP0002 might be more in the range of 20-30 $\mu\text{g/L}$ rather than the 163 $\mu\text{g/L}$ reported in the grab sample. This ratio appears to demonstrate that there is a significant decrease in concentrations down gradient and offsite from onsite concentrations.

AOI 53 Summary: MCLs were exceeded for five VOC compounds in samples from grab sample points and wells. However, in well samples only, only three VOC compounds from four wells exceeded MCLs down gradient of where VOCs in soil and soil gas appear to originate in AOI 26. In addition, samples from the two offsite wells, MW-10 and MW-11, did not have concentrations of VOCs above MCLs. Analysis of a water sample from well MW-8D, screened deep in the aquifer and downgradient from the source, did not have detectable concentrations of VOCs, except for acetone, a common laboratory contaminant. The existing data and the ratio of grab sample to well sample concentrations suggest that the concentrations of VOCs are likely to attenuate significantly offsite along Knollwood Circle. However, additional sample points would be needed to verify lateral and vertical extents of impacts and attenuation offsite.

6.5.28 Parking Lot

AOI Description: The Parking Lot area is located north of the Main Production Building and was used for employee parking. The parking lot is approximately 300 by 450 feet and cover with asphaltic concrete.

Previous Investigation History: A previous investigation of lead in the Site's perimeter area did not focus in this area.

CCR Investigation Summary: Sampling was not performed as part of the CCI.

FI Field Program Summary: To assess the parking lot for potential impacts and evaluate background metal concentrations, six borings (XR0209 through DP0214) were advanced to 4 feet bgs. Soil samples were collected and analyzed for lead and arsenic. Soil gas samples were not collected because VOCs were not considered to be likely chemicals of concern at this location based on historical use. Boring locations are shown on Figure 4.

Summary of Soil Sampling and Analysis

- Soil samples were collected and analyzed at multiple near-surface depths of less than 4 feet bgs for lead and arsenic. A summary of sampling and analysis for the AOI is shown in Table 4.
- Lead was not detected at concentrations above remediation criteria in the eight samples collected. Reported concentrations of lead ranged from 2.65J mg/kg to 335 mg/kg (XR0212 at 0 foot bgs). This elevated concentration is thought to be the result of getting some asphalt in the sample analyzed. Results of lead analyses are summarized in Table 9 and shown on Figure 8-10.
- Arsenic was not detected at concentrations above the remediation criterion in the eight samples analyzed. Reported concentrations of arsenic ranged from 1.05J mg/kg to 2.4J mg/kg. Results of arsenic analyses are summarized in Table 10 and shown on Figure 8-10.

Parking Lot Summary: The reported concentrations in soil are less than the remediation criteria, and no activities that would have impacted the area have been identified as having taken place within the area. Therefore no additional sampling is recommended.

7. DATA VALIDATION

Analytical results for environmental samples analyzed by American Environmental Testing Laboratory, Inc (AETL), Jones Environmental (Jones), H&P Mobile Geochemistry, Centrum Environmental Laboratories (CEL), and Calscience Environmental Laboratory (CAL), collected at the Site from August 2005 through October 2005, were reviewed to determine the data usability (CCR Appendix I). Each laboratory data package was reviewed with guidance provided by the United States Environmental Protection Agency (USEPA) "National Functional Guidelines for Organic Data Review" (EPA 540/R-99/008), and/or "National Functional Guidelines for Inorganic Data Review" (EPA 540-R-04-004).

Laboratory method-specific criteria as prescribed by "Test Methods for Evaluating Solid Waste", SW846, Update III, 1996 were used, where applicable, if the analytical anomaly identified was not addressed by the guidelines referenced above. During the data validation process, the following quality control/quality assurance (QA/QC) criteria were reviewed where applicable:

- Preservation and Holding Time Compliance
- Blank Sample Analysis
- System Monitoring/Surrogate Compound Recoveries
- Laboratory Control Samples, Matrix Spike/Matrix Spike Duplicate Recoveries
- Use of Laboratory Data Qualifiers

Each section below provides a brief description of the procedure used in the evaluation and an example corrective action implemented as a result of the assessment. The intent of this summary is to assist the data user with an understanding of the data qualification procedures implemented during the reduction of the investigation results and their use in the evaluation of the current Site conditions.

7.1 Preservation and Holding Time Compliance

Maximum allowable holding times for each parameter were measured from the time of sample collection to the time of sample preparation or analysis for each project sample. All project samples reviewed were found to be properly preserved or analyzed within the USEPA recommended maximum holding time without exception.

7.2 Blank Sample Analyses

The presence of target compounds in associated trip, field, equipment, preparation and/or method blank samples prepared and analyzed concurrently with the project samples, was determined as part of each laboratory sample data package. If target compounds were reported in blank at a concentration above the method detection limit (MDL) for organic parameter analyses or the instrument detection limit (IDL) for inorganic parameter analyses, the associated sample results were qualified as described below.

In the case of organic method blank sample analyses, if the target compound detected was identified as a "common laboratory contaminant" by the USEPA Functional Guidelines, an action level of 10 times (10X Rule) the blank contamination level was calculated. For all

other organic parameters that are not defined as common laboratory contaminants, an action level of 5 times (5X Rule) the blank contamination level was calculated. In the case of inorganic parameter blank sample analyses, an action level of 10 times (10X Rule) the blank contamination level was calculated.

Then, in accordance with USEPA guidance, if the detection of the blank contaminant in the associated project samples was reported at a concentration between the MDL or IDL and the action level, the result was qualified as non-detect (U). This data qualification indicates that the parameter was due to sampling and/or analysis contamination and is not representative of the site conditions.

Target compounds were not identified in associated blank samples at a concentration above the method detection limit (MDL) for organic parameter analyses or the instrument detection limit (IDL) for inorganic parameter analyses, except for the following:

Blank	Target Analyte(s)	Concentration.	Affected Sample(s)	Flag sample results with a "U" if < to this value
Trip Blank (H&P)	Toluene	5 µg/L	DP3-SG-010-01 DP6-SG-005-01 DP9-SG-005-01 DP10-SG-005-01	25 µg/L
EB83005A (SDG 34478)	Lead	0.087 ppm	DP0035-SS-000-01 DP0039-SS-000-01 DP0034-SS-000-01 DP0034-SS-000-02 DP0038-SS-000-01 DP0037-SS-000-01 DP0036-SS-000-01 DP0035-SS-001-01 DP0039-SS-001-01 DP0037-SS-001-01 DP0060-SS-010-01	0.87 ppm
EB83005B (SDG 34478)	Lead Zinc	0.071 ppm 0.023 ppm	DP0060-SS-010-01	0.71 ppm 0.23 ppm
EB083105A (SDG 34488)	Lead	0.051 ppm	DP0048-SS-000-01 DP0048-SS-000-02 DP0049-SS-000-01 DP0049-SS-005-01 DP0066-SS-000-01 DP0082-SS-000-01 DP0082-SS-000-02 DP0080-SS-000-01 DP0081-SS-000-01 DP0081-SS-000-02 DP0067-SS-000-01 DP0088-SS-000-01 DP0066-SS-001-01 DP0082-SS-001-01 DP0080-SS-001-01	0.51 ppm
EB083105B (SDG 34488)	Zinc	0.017 ppm	DP0066-SS-004-01 DP0080-SS-000-01	0.17 ppm

EB090105B (SDG 34498)	Zinc	0.031 ppm	DP0109-SS-000-01 DP0110-SS-000-01 DP0098-SS-000-01 DP0105-SS-000-01 DP0111-SS-000-01 DP0111-SS-001-01	0.31 ppm
EB090205B (SDG 34509)	Zinc	0.029 ppm	DP0116-SS-000-01 DP0116-SS-005-01 DP0116-SS-015-01 DP0117-SS-000-01 DP0117-SS-005-01 DP0117-SS-010-01 DP0118-SS-000-01 DP0118-SS-005-01 DP0118-SS-010-01 DP0086-SS-000-01	0.29 ppm
EB090705B (SDG 34527)	Copper Zinc	0.011 ppm 0.018 ppm	DP0113-SS-005-01 DP0113-SS-000-01 DP0113-SS-010-01 DP0113-SS-015-01	0.11 ppm 0.18 ppm
EB091605 (SDG 34634)	Copper Lead Zinc	0.027 ppm 0.243 ppm 0.029 ppm	GS0001-SS-0000-01 GS0001-SS-0003-01 GS0001-SS-0002-01	0.27 ppm 2.43 ppm 0.29 ppm
EB092205 (SDG 34699)	Copper Lead Zinc	0.01 ppm 0.297 ppm 0.029 ppm	GS0024-SS-000-01 GS0022-SS-002-01 GS0023-SS-000-01 GS0023-SS-001-01 GS0021-SS-000-01 GS0024-SS-002-01 GS0021-SS-002-01 GS0022-SS-000-01	0.1 ppm 2.97 ppm 0.29 ppm
EB100705 (SDG 34858)	Zinc	0.024 ppm	GS0028-SS-003-01 GS0028-SS-001-01 GS0029-SS-003-01 GS0029-SS-001-01 GS0028-SS-003-02	0.24 ppm

7.3 System Monitoring/Surrogate Compound Recoveries

System monitoring/surrogate compounds were added to each sample prior to analysis of organic parameters by USEPA Methods TO-15, 8015, 8260B, 8270C, and 8082 to confirm the efficiency of the sample preparation procedures. The calculated recovery for each surrogate compound was evaluated to confirm the accuracy of the reported results. In general, if the calculated recovery of these compounds was greater than the laboratory specific upper acceptance limit (UL), associated detected target compounds were qualified as estimated (J) and non-detects were not qualified. If the calculated recovery of these compounds was less than the laboratory-specific lower acceptance limit (LL), associated detected target compounds were qualified as estimated (J) and non-detects were qualified as having an estimated quantitation limit (UJ).

If two or more surrogates in either semi-volatile fraction (base/neutral or acid fraction), for analyses by USEPA Method 8270C, have percent recoveries greater than the upper acceptance limit, associated target analyte positive results are qualified "J" and non-detects

should not be qualified. If two or more surrogates in either semi-volatile fraction (base/neutral or acid fraction) have percent recoveries greater than 10 percent but less than the lower acceptance limit, associated target analyte positive results are qualified "J" and non-detects are qualified "UJ". In the case where two or more surrogates are out in either fraction (one with a recovery greater than the upper acceptance limit and one with a recovery greater than 10 percent but less than the lower acceptance limit), associated target analyte positive results are qualified "J" and non-detects are qualified "UJ". If any surrogate in either semi-volatile fraction (base/neutral or acid fraction) shows less than 10 percent recovery, associated target analyte positive results, within that fraction, are qualified "J" and non-detects are qualified "R."

The calculated recovery of system monitoring/surrogate compounds was within method specific criteria for the analysis of the project samples with the following exceptions:

Surrogate		Criteria (%)
Dibromofluoromethane	S01	NR
1,2-Dichloroethane-d4	S02	NR
Toluene-d8	S03	NR
4-Bromofluorobenzene	S04	70 - 130

Project Sample ID	S01	S02	S03	S04	Positive Results	Non Detect (ND)
	%R	%R	%R	%R		
DP0195-SG-005-02				< 70	J	UJ

Qualify all VOC target analytes according to the above table.

Surrogate		Criteria (%)	Semivolatile Fraction
Phenol-d5	S01	21 - 113	Acid
2-Fluorophenol	S02	25 - 121	Acid
2,4,6-Tribromophenol	S03	19 - 122	Acid
Nitrobenzene-d5	S04	23 - 130	Base/Neutral
2-Fluorobiphenyl	S05	30 - 125	Base/Neutral
Terphenyl-d14	S06	18 - 137	Base/Neutral

Project Sample ID	S01 %R	S02 %R	S03 %R	S04 %R	S05 %R	S06 %R	Acid		Base/Neutral	
							Positive Results	Non Detect (ND)	Positive Results	Non Detect (ND)
GS0026-SS-000-01	0	0	0	126	121	44	J	R		
CS0018-CC-000-01	< 21	0	0	62	93	78	J	R		
CS0017-CC-000-01	< 21	0	0	68	96	72	J	R		

Qualify the following acid fraction target analytes according to the above table: 2,4,5-Trichlorophenol, 2,4,6-Trichlorophenol, 2,4-Dichlorophenol, 2,4-Dimethylphenol, 2,4-Dinitrophenol, 2-Chlorophenol, 2-Methylphenol, 2-Nitrophenol, 4,6-Dinitro-2-methylphenol, 4-Chloro-3-methylphenol, 4-Methylphenol, 4-Nitrophenol, Pentachlorophenol, and Phenol.

During the data review it was also noted that for 8082 analyses (i.e., PCBs) only percent recoveries for the surrogate tetrachloro-m-xylene were reported even though the laboratory

had confirmed, via telephone/email, that the other surrogate decachlorobiphenyl was also added to all project samples. It is recommended that, in the future, AETL report the percent recoveries for all added surrogates.

7.4 Laboratory Control Samples, Matrix Spike/Matrix Spike Duplicate Recoveries

Analytical precision and accuracy were evaluated based on the laboratory control (LCS) and matrix spike (MS) sample analyses performed concurrently with the project samples. For LCS analyses, after the addition of a known amount of each target analyte into a sample of laboratory reagent water, the sample was analyzed to confirm the ability of the analytical system to accurately quantify the compounds. For MS samples, after the addition of a known amount of each target analyte to the sample matrix of a site sample designated for MS analysis, the sample was analyzed to confirm the ability of the analytical system to identify these compounds within the sample matrix.

The percent recovery calculated for each target analyte fell within method specific criteria for each project sample analytical batch and no qualification of the data is recommended.

7.5 Use of Laboratory Data Qualifiers

Sample data was qualified by the laboratory in accordance with laboratory specific standard operating procedures (SOPs). Data qualification included the reporting of estimated concentrations of target compounds/analytes quantified either (a) below the project reporting limit (RL) but above the method or instrument detection limit, or (b) at concentrations greater than the instrument calibration. The presence of target compounds in corresponding method blank samples, and non-compliant results of associated QA/QC sample analyses (i.e., MS/MSD) were also qualified by the laboratory.

8. HASP IMPLEMENTATION

Haley & Aldrich prepared a site-specific HASP pursuant to California Code of Regulations Title 8 and Code of Federal Regulations Title 29, Section 1910.120. The plan addressed the following:

- Identification and description of potentially hazardous substances that may be encountered during field operations;
- Engineering controls and procedures to minimize and/or eliminate potential exposures;
- Personal protective equipment (PPE) and clothing for Site activities; and
- Measures that need to be implemented in the event of an emergency.

Haley & Aldrich field personnel reviewed the HASP prior to commencing fieldwork. Prior to initiation of field activities each day, a Site safety briefing was conducted to identify potential physical and chemical hazards and measures to be taken in event of an emergency. All on-site personnel were required to sign the site safety briefing form.

During field activities, personnel within the exclusion zone wore appropriate level D PPE and upgraded to level C PPE, as deemed warranted or required by the HASP. HASP revisions were made as necessary as additional information regarding potential Site hazards were identified or additional field tasks were added. No incidents or emergency actions related to Site sampling occurred during the field program. A copy of the most recent project-specific HASP is contained in the CCR (Haley & Aldrich 2006).

9. RECOMMENDATIONS

Results of the FI indicate that 25 of the 54 AOIs did not have impacts greater than the risk-based remediation criteria for COPCs in the soil and soil gas samples analyzed. Impacts that will require remediation were found in 29 of the 54 AOIs.

Based on the information collected and reviewed we recommend the following:

- Additional soil sampling can be performed either prior to or during remedial activities at AOIs 6, 10, 18, 25, 26, 27, 28, 30, 31, 33, 34, 35, 36, 38, 41, 43, 44, 45, 46, 48, 49, 50, 51, 52, 53, and the Northwest Loading Dock area.
- AOIs 7, 8, and 42 are considered sufficiently delineated but require remediation to remove soil with concentrations above DTSC approved risk-based remediation criteria.
- No further action is recommended for AOIs 1, 2, 3, 4, 5, 9, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24, 29, 32, 37, 39, 40, and 47 because COPCs were not detected at concentrations above the risk-based remediation criteria.
- Remediation of AOIs 6, 7, 8, 10, 18, 25, 26, 27, 28, 30, 31, 33, 34, 35, 36, 38, 41, 42, 43, 44, 45, 46, 48, 49, 50, 51, 52, 53, and the Northwest Loading Dock area is recommended due to the presence COPCs at concentrations greater than risk-based remediation criteria.
- For AOIs where lead is the primary chemical of concern, field screening with an XRF is recommended during removals and for confirmation analysis, with limited stationary laboratory analysis.
- Design and implementation of a pilot study for soil gas remediation of VOCs in soil gas from apparent releases in and around AOI 26.
- Additional groundwater grab sampling is recommended offsite along Knollwood Circle and if necessary, well installation to delineate the lateral and vertical extent of VOCs in groundwater west of the source area at AOI 26 in the northern portion of Warehouse No. 3.
- Impacted concrete as identified on Figure 7-2 should be removed, managed and disposed offsite to minimize the potential for leaving material onsite with concentrations of COPCs greater than the risk-based remediation criteria.

10. LIMITATIONS

This report was prepared by Haley & Aldrich, under the professional direction and review of the registered professional(s) listed. The work described herein was conducted in accordance with generally accepted professional engineering and geologic practice. The conclusions provided by Haley & Aldrich are based solely on the scope of work conducted and the sources of information referenced in this report. No other warranty exists, either expressed or implied.

All data, findings, observations, conclusions, and recommendations are based solely upon Site conditions observed under the conditions present at the time of performance of services and the sources of information referenced in this report. In addition to data collected by and observations made by Haley & Aldrich personnel, this report and any conclusions herein, incorporates Site conditions observed and described by others as reported in records reviewed by Haley & Aldrich as of the date of report preparation. Haley & Aldrich relied—in part—on data provided or collected by others, including analytical laboratories in the development of interpretations about environmental conditions at the Site and development of any conclusions included herein. The accuracy, precision, or representative nature of data originally generated by others was not independently verified by Haley & Aldrich and would be beyond the scope of this project. In addition, Site conditions may vary beyond the points explored in this and other investigations. Haley & Aldrich is unable to report on, or accurately predict events, which may impact the Site following conduct of the described services, whether occurring naturally or caused by external forces. Therefore, site conditions in the future may vary from conditions observed or inferred during implementation of this work.

Services hereunder were performed in accordance with our agreement and understanding with, and solely for the use of, Delphi Corporation. Haley & Aldrich assumes no responsibility for conditions we were not authorized to investigate, or conditions not generally recognized as environmentally unacceptable at the time services were performed. Any additional information that becomes available concerning this Site should be provided to Haley & Aldrich so that our conclusions and recommendations may be reviewed and modified as necessary. We are not responsible for the subsequent separation, detachment or partial use of this document. No warranty or guarantee, whether expressed or implied, is made with respect to the data reported or findings, observations, conclusions, and recommendations expressed in this report. Any reliance on this report by a third party shall be at such party's sole risk.

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