MILLER BROOKS
Environmental, Inc.

March 31, 2004

Mr. David Bacharowski
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013

SITE: GREENPARK RUNKLE CANYON DEVELOPMENT
VENTURA COUNTY, CALIFORNIA

SUBJECT: WORK PLAN TO CONDUCT ONSITE GROUNDWATER INVESTIGATION ACTIVITIES

Dear Mr. Backarowski:

Miller Brooks Environmental, Inc. (Miller Brooks), on behalf of GreenPark Runkle Canyon, LLC (GreenPark) is pleased to submit this work plan to conduct onsite groundwater investigation activities at the GreenPark Runkle Canyon Development in Ventura County, California. Work activities presented below are proposed in response to the Los Angeles Regional Water Quality Control Board (LARWQCB) correspondence dated February 26 2004 (LARWQCB, 2004), regarding the report titled *Surface Water and Groundwater Sampling for Specific Organic/Inorganic Chemicals and Perchlorate* dated September 17, 2004, prepared by Miller Brooks. The sampling was conducted at the request of GreenPark to determine the presence or absence of specific chemicals in the surface water and groundwater at the 1,615-acre Runkle Canyon Property (Property). Based on review of the data contained within the report, the LARWQCB is requiring further assessment of groundwater beneath the site.

1.0 SITE AND VICINITY DESCRIPTION

The subject Property is located within an area of undeveloped land referred to as Runkle Canyon, located at the terminus of Sequoia Avenue in the City of Simi Valley in Ventura County, California. The Property consists of three land parcels totaling approximately 1,615 acres. The Property is identified by the Ventura County's Assessors office as Parcel Numbers 685-130-180, 634-010-495, 685-040-075, 658-040-095, 658-040-100, 658-040-140, 685-040-165, 685-040-190, 685-040-200, 685-040-210, 685-040-220, 685-040-240, 685-051-225, 658-051-230, 658-130-160, and 685-040-255. There is no known street address for the subject Property. The Property location is shown on Figure 1.

The subject Property consists of a north-south trending valley with hills to the south, east and west. The northeastern portion consists of 550 acres within a valley that contains a small stream that drains to the north, and has downcut through the soil in the valley. The northern part of the valley consists of a gently sloping plateau area that is bordered to the north by a residential development, consisting of single-family homes. The northwestern portion consists of 350 acres of undeveloped land, separated from the valley to the east by a steep ridgeline. The southern portion of the Property consists of 715 acres of land that is comprised of a hilltop plateau used for cattle grazing. Adjacent to the east of the Property is undeveloped land used for horse grazing.

The Property is currently used for cattle grazing. A former sand and gravel mine was located on the central portion of the Property, extending onto the southern 715-acre parcel. The sand and gravel mine was in operation until approximately 1985 and the features associated with the mine included a small building, a conveyor system (removed), and asphalt roadways. In 1985, the County of Ventura designated the mine as closed and reclaimed (County of Ventura, 2000).

Undeveloped land borders the Site to the east, west and south. The Rocketdyne Propulsion and Power, Santa Susana Field Laboratory (SSFL) facility is located approximately ½-mile to the southeast and is the only identified source of potential environmental concern in the vicinity of the Property. The SSFL facility is located at a higher topographic elevation than the Property; however, a steep ridgeline separates the facility from the Property (USGS, 1952).

2.0 BACKGROUND

Assessment activities were conducted on the Property to determine if detectable concentrations of perchlorate and/or other organic and inorganic chemicals are present in surface and groundwater at the Property. The assessment activities on the Property included the drilling and sampling of seven soil borings, sampling of asphaltic material, and the collection of 11 samples from surface water and from groundwater encountered in soil borings. Site assessment activities conducted at the Property are summarized below:

Assessment Activities:

On October 24, 2002, one surface sample of asphaltic material identified during Property reconnaissance was collected and one surface water sample was collected on the Property for laboratory analysis (Figure 2). The asphaltic material sample was analyzed for constituents consistent with the industry standard for an analytical screen performed to determine the presence of hazardous chemicals. In addition, a leachate analysis was performed to determine if the sample contained soluble or leachable constituents. The surface water sample was collected and analyzed for total petroleum hydrocarbons–extractable, (TPH-E) by Environmental Protection (EPA) Method 8015M, total recoverable petroleum hydrocarbons (TRPH) by EPA Method 418.1, oil and grease (O&G) by EPA Method 413.2, and volatile organic compounds (VOCs) by EPA Method 8260B. The water sample was analyzed for hydrocarbons because of the sheen on the water and proximity to the asphaltic material (Miller Brooks, 2003a). Results of the laboratory analysis of the asphaltic material and surface water samples are presented in Table 1.

On January 8 and 9, 2003, Miller Brooks (with Seward Engineering) supervised the advancement of seven soil borings (HS-25 through HS-31; Figure 2) to approximate total depths ranging from 15 feet to 66.5 feet below ground surface (bgs). The borings were drilled using a hollow-stem auger drill rig with a split-spoon sampler. Groundwater was found in three of the borings (HS-25, HS-26, and HS-29). Groundwater samples were collected from these borings for analysis for perchlorate using EPA Method 314. The samples were collected from water within the auger of the drilling rig, and the water had a high silt content (Miller Brooks, 2003b). Results of the laboratory analysis of groundwater/silt samples are presented in Table 2.

On February 5, 2003, one groundwater sample was collected from a groundwater monitoring well previously installed at the Property (observed during site reconnaissance activities; see Figure 2). The groundwater sample (Well-1) was analyzed for TPH-E and TPH-volatile (TPH-V) using EPA Method 8015M, VOCs using EPA Method 8260B, and perchlorate using EPA Method 314 (Miller Brooks, 2003b). Results of the laboratory analysis of the groundwater sample are presented in Tables 1 and 2.

On March 14, 2003, surface water and soil from the creek in Runkle Canyon was sampled at three locations Creek-1 through Creek-3 (Figure 2). In addition, one water sample (Windmill-1) was collected from an aboveground tank, which stored groundwater pumped from a windmill on the southern portion of the Property. The samples were analyzed for perchlorate using the EPA Method 314 (Miller Brooks, 2003b). Results of the laboratory analysis of the water samples are presented in Table 2.

On May 1, 2003, personnel from Miller Brooks met with the onsite cattle rancher to locate areas where artesian springs were present and collected three water samples (Spring-1 through Spring-3; Figure 2). The samples were analyzed for perchlorate using EPA Method 314 (Miller Brooks, 2003b). Results of the laboratory analysis of the water samples are presented in Table 2.

Findings

The findings of the assessment activities conductivity at the Property from October 2002 through May 2003 (Miller Brooks, 2003a/b) indicated the following:

- Groundwater was encountered during the investigation at depths ranging from approximately 20 feet to 56 feet bgs in the soil borings and the groundwater well.

- No detectable concentrations of TPH-E, TPH-V, TRPH, O&G, or VOCs were found in the water samples analyzed for these compounds (Samples RR-Swater-1 and Well-1).

- Laboratory analysis of the asphaltic material showed concentrations of 32,000 milligrams per kilogram (mg/kg) TPH-E, 6,200 mg/kg TRPH, and 9,700 mg/kg O&G. When analyzed using the waste extraction test, the leachate showed a concentration of 8.8 micrograms (ug/L) TPH-E, 0.066 ug/L benzo(b)fluoranthene, and 0.15 ug/L phenanthrene. All Title 22 metals concentrations were below state and federal regulatory limits (see Table 1). No VOCs or polychlorinated biphenyls were detected in the sample.

- No concentrations of perchlorate were detected in any of the water samples analyzed. Perchlorate was only detected in two groundwater/silt samples collected from Borings HS-25 and HS-26 (samples HS-25-56' and HS-26-37'). The concentrations detected were at 0.06 milligrams per kilogram (mg/kg) and 0.05 mg/kg, respectively. These levels are below the EPA's Preliminary Remediations Goals for perchlorate in residential soil (7.8 mg/kg; USEPA, 2001/2002).

3.0 PROPOSED SITE INVESTIGATION ACTIVITIES

3.1 DRILLING, SOIL SAMPLING, AND MONITORING WELL INSTALLATION

Based on the information presented above and at the direction of the LARWQCB, Miller Brooks proposes to install two groundwater monitoring wells at the site to further assess groundwater conditions proximal to the location of Borings HS-25 and HS-26 (Figure 2). The borings will be drilled using a hollow-stem auger drilling rig. The groundwater monitoring wells will be constructed of 2-inch diameter, Schedule 40, polyvinyl chloride (PVC) casing with screened casing intervals extending from approximately 5 feet above groundwater to 10 feet below groundwater. All well installation activities will be conducted in accordance with State and

County guidelines, and all work will be performed under the supervision of a California Registered Geologist. In addition, prior to installation of the wells, necessary well permits will be obtained from the Los Angeles County Department of Health Services (LACDHS). The LARWQCB and LACDHS will be notified a minimum of 48 hours prior to commencing well installation activities.

Soil samples will be collected at 5-foot depth intervals for soil description, field hydrocarbon vapor screening, and possible laboratory analysis. Prior to drilling, Underground Service Alert will be notified and each location will be cleared to approximately 5 feet bgs using a hand auger to avoid damage to possible underground utilities. A description of general field procedures is included in Appendix A.

Soil generated during drilling activities will be temporarily stored onsite in labeled, Department of Transportation approved, 55-gallon drums or a sealed, roll-off bin pending receipt of laboratory analysis results and offsite transport to an appropriate soil recycling facility.

3.2 WELL DEVELOPMENT AND GROUNDWATER SAMPLING

Following installation, the groundwater monitoring wells will be developed using a combination of surging and bailing techniques. Groundwater monitoring and sampling activities will be conducted approximately 72 hours following well development activities. All groundwater monitoring and sampling activities will be conducted in accordance with standard regulatory protocol. Refer to Appendix A for a description of general field procedures.

Groundwater generated during well development and sampling activities will be temporarily stored onsite in labeled, Department of Transportation approved, 55-gallon drums pending receipt of laboratory analysis results and offsite transport to an appropriate recycling facility.

3.3 LABORATORY ANALYSIS

In accordance with LARWQCB requirements, the groundwater samples will be analyzed for VOCs using EPA Method 8260B, n-nitrosodimethylamine (NDMA) using EPA Method 1625C, and perchlorate using EPA Methods 314 and 8321 (or equivalent). Chain of custody protocol will be followed for all samples selected for laboratory analysis. The chain of custody form accompanies the samples from the sampling locality to the laboratory, providing a continuous record of possession prior to analysis. Due to the proximity to the previous borings, the soil samples collected from the wellbores will not be analyzed by the laboratory. However, the samples will be sent to the laboratory and, if indicated by field screening, laboratory analyses may be preformed.

3.4 SITE INVESTIGATION REPORT

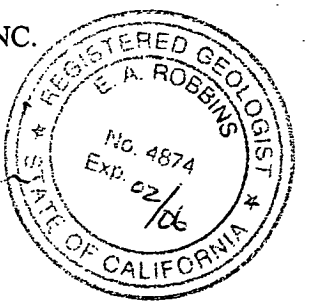
A report will be prepared upon completion of site investigation activities. The report will include a summary of field activities, results of laboratory analysis of soil and groundwater samples, graphic illustrations of the site and subsurface (includes site plan, compound distribution map(s), soil boring logs, and well construction details), findings, and conclusions. The laboratory results for perchlorate, if detected, will be compared with the California EPA (CALEPA) Public Health Goal of 6 parts per billion (CALEPA, 2004). The report will be signed by a California Registered Geologist.

4.0 SITE SAFETY PLAN

All work activities will be conducted in accordance with requirements of the Miller Brooks Corporate Health and Safety Program. A site safety plan, designed to promote project personnel safety and preparedness during the activities described in this work plan, is included in Appendix B.

If you have any questions regarding this work plan, please call me at (714) 960-4088.

Sincerely,
MILLER BROOKS ENVIRONMENTAL, INC.



Elizabeth A. Robbins, RG 4874
Senior Geologist

Attachments:
Table 1 - Results of Organic Analyses of Water Samples
Table 2 - Results of Perchlorate Analysis of Soil and Water Samples
Figure 1 - Vicinity Map
Figure 2 - Site Plan Showing Surface Water and Groundwater Sample Locations
Appendix A - General Field Procedures
Appendix B - Site Safety Plan

5.0 REFERENCES

California Environmental Protection Agency, 2004, News Release No. 04-01, OEHHA Announces Health Goal for Perchlorate in Drinking Water, March 11.

California Regional Water Quality Control Board, 2004, California Water Code Section 13267, Request for Historical and Current Site Information – GreenPark Runkle Canyon Development, Ventura County, California, February 26.

County of Ventura, 2000, Closure of the Former Southern Pacific Milling Company Mine at Runkle Ranch, Simi Valley, CUP 2336; Assessor's Parcel Nos. 685-040-04, 685-0-130-03 and 695-0-130-04, September.

Miller Brooks Environmental, Inc., 2003a, Report for Asphaltic Material and Surface Water Sampling and Analysis Program on the 550-Acre Parcel Within the Runkle Canyon Property Located South of Simi Valley, in Ventura County California, May 21.

Miller Brooks Environmental, Inc., 2003b, Surface Water and Groundwater Sampling for Specific Organic/Inorganic Chemicals and Perchlorate, September 17.

US Environmental Protection Agency, Region IX, 2002, Region 9 PRGs Table 2002 Update, October 1.

United States Geological Survey, 1952, Calabassas Quadrangle, 7.5 Minute Topographic Series, Scale 1:24,000, Photorevised 1967.

TABLES

TABLE 1
RESULTS OF ORGANIC ANALYSES OF WATER SAMPLES
Runkle Canyon
Simi Valley, California

Sample ID	Date Sampled	EPA Methods and Analytes (Results in µg/L)				
		TPH-E	TPH-V	VOCs*	TRPH	O & G
		8015M	8015M	8260B	418.1	413.2
RR-Swater-1	10/24/02	ND<500	--	ND<500-20,000	ND<500	ND<500
Well-1	2/5/03	ND<500	ND<50	ND<0.5-200	--	--

Notes:

EPA - Environmental Protection Agency
µg/L - micrograms per liter
TPH-E - total petroleum hydrocarbons-extractable
TPH -V - total petroleum hydrocarbons-volatile
VOCs - volatile organic compounds
TRPH - total recoverable petroleum hydrocarbons
O&G - oil and gas
* - see official laboratory reports for complete list of analytes
ND - not detected at or above the reporting limit
-- - not analyzed

TABLE 2
RESULTS OF PERCHLORATE ANALYSIS OF SOIL AND WATER SAMPLES
Runkle Canyon
Simi Valley, California

Water Sample ID	Date	Result (in µg/L)
Well-1	2/5/03	ND<4
Creek-1 Water	3/14/03	ND<4
Creek-2 Water	3/14/03	ND<4
Creek-3 Water	3/14/03	ND<4
Spring - 1	5/1/03	ND<4
Spring - 2	5/1/03	ND<4
Spring - 3	5/1/03	ND<4
Trip Blank	5/1/03	ND<4
Windmill-1 Water	3/14/03	ND<4
Soil Sample ID	**Date**	**Result (in mg/kg)**
HS-25-56'	1/8/03	0.06
HS-26-37'	1/8/03	0.05
HS-29-Water	1/9/03	ND<0.02
Creek-1 Soil	3/14/03	ND<0.040
Creek-2 Soil	3/14/03	ND<0.040
Creek-3 Soil	3/14/03	ND<0.040

Perchlorate was analyzed using EPA Method 314
µg/L = micrograms per liter
ND = not detected at limit indicated on official laboratory report
mg/kg = milligrams per kilogram

FIGURES

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SCALE

MILLER BROOKS Environmental, Inc.	DRAWN BY: PEL	VICINITY MAP	FIGURE 1
	DATE: 11/21/02		
	REVISED BY: DCN		
2124 MAIN STREET, SUITE 200 HUNTINGTON BEACH, CA. 92648 (714) 960-4088	REVISED: 08/28/03	RUNKLE CANYON PROPERTY SIMI VALLEY, CA.	
	APPROVED BY: EAR		
PROJECT NO. 01-406-0002-02	DATE: 08/28/03	FILE: K:\DWGS\RUNKLE RANCH\VICINITY MAP [F1C]	DATE PLOTTED: 08/28/03

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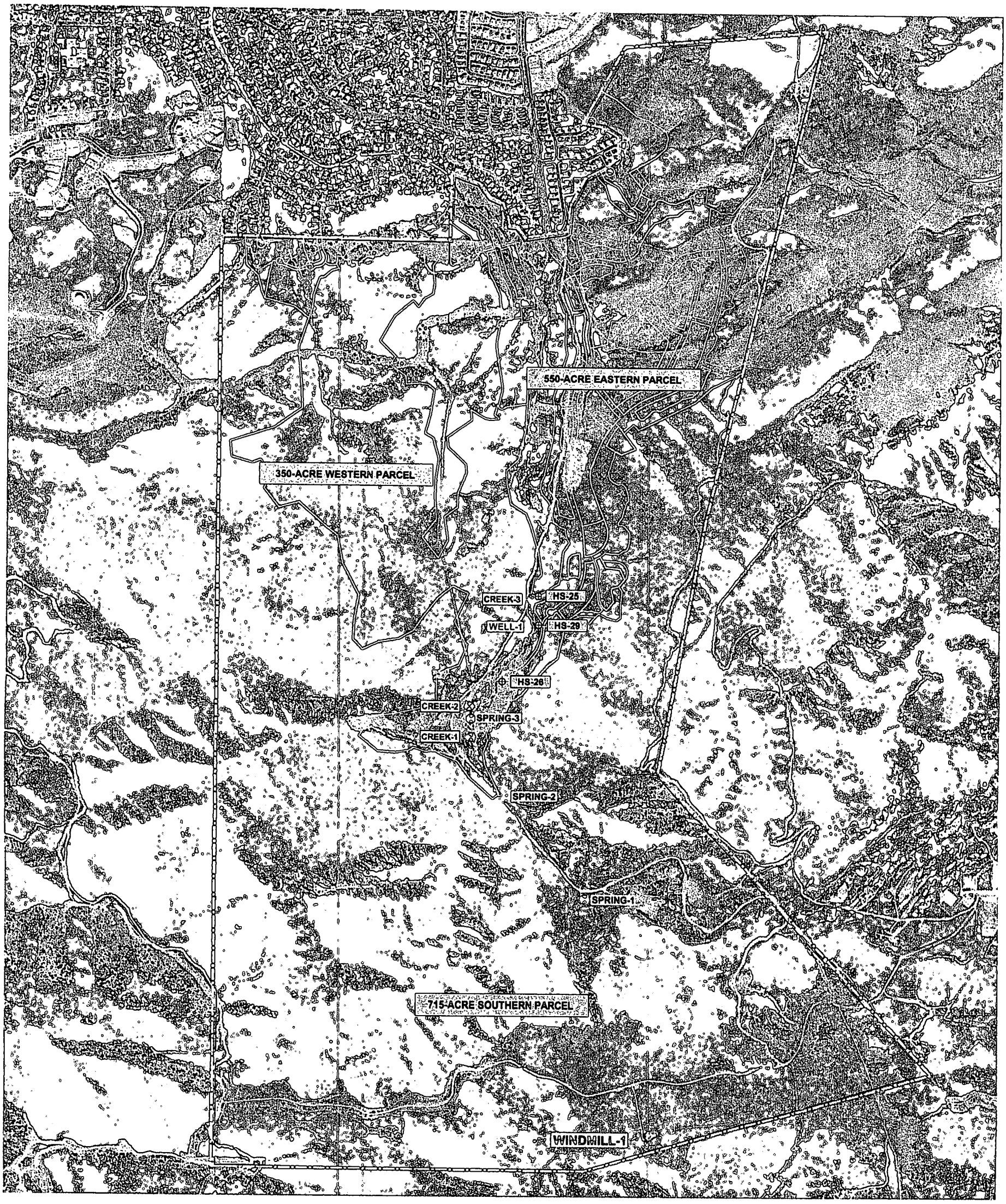
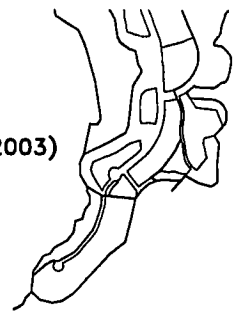


LEGEND

WELL-1 ⊕	FORMER GROUNDWATER MONITORING WELL
CREEK-3 ⊗	SURFACE WATER SAMPLE LOCATION (MARCH 2003)
HS-29 ⊕	SOIL BORING LOCATION WITH GROUNDWATER SAMPLE (JANUARY 2003)
WINDMILL-1 ⊹	WATER SAMPLE FROM WINDMILL STORAGE TANK
SPRING-1 ⊗	SURFACE WATER SAMPLE LOCATION (MAY 2003)
———	PARCEL BOUNDARY
	PROPERTY BOUNDARY



PROPOSED DEVELOPMENT

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SCALE

MILLER BROOKS Environmental, Inc.

2124 MAIN STREET, SUITE 200
HUNTINGTON BEACH, CA. 92648
(714) 960-4088

PROJECT NO. 01-402-0002-03

DRAWN BY:	AIL
DATE:	06/05/03
REVISED BY:	AIL
REVISED:	06/05/03
APPROVED BY:	EAR
DATE:	06/05/03

SITE PLAN SHOWING
SURFACE WATER AND
GROUNDWATER SAMPLE LOCATIONS

RUNKLE CANYON PROPERTY
SIMI VALLEY, CA.

FIGURE 2

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DATE PLOTTED: 08/05/03

APPENDIX A

APPENDIX A

GENERAL FIELD PROCEDURES, BORING LOGS, MONITORING WELL CONSTRUCTION DETAILS, AND MONITORING WELL PERMITS

DRILLING AND SOIL SAMPLING

Soil borings are drilled using a continuous-flight, hollow-stem auger drilling rig. Soil excavated from the borings are contained in labeled, Department of Transportation (DOT) approved, sealed, roll-off bins and stored onsite pending appropriate disposal. Borings that are not completed as vadose or groundwater monitoring wells are grouted to within 2 feet of the ground surface with bentonite, and finished to the surface with asphalt or concrete to match the existing grade.

Soil samples are obtained from each boring for soil description, field hydrocarbon vapor screening, and possible laboratory analysis. Soil samples are generally retrieved from the borings at 5-foot depth intervals using a standard penetration or California-modified split-spoon sampler lined with three 2-inch diameter brass sample inserts. The sampler is driven approximately 18 inches beyond the lead auger with a 140-pound hammer dropped from a height of 30 inches.

Upon retrieval, soil samples are immediately removed from the sampler and sealed with Teflon sheeting and polyurethane caps. Each sample is labeled with the project number, boring number, sample depth, geologist's initials, and date of collection. After the samples have been labeled and documented in the chain of custody record, they are either delivered to an onsite mobile laboratory for immediate analysis or placed in a cooler with ice at approximately 4 degrees Celsius for transport to an offsite state-certified laboratory. Samples not selected for immediate analysis may be transported in a cooler with ice and archived in a frostless refrigerator at approximately 4 degrees Celsius for possible future testing.

During sampling activities, soil adjacent to the laboratory sample is screened for organic vapors using a photo-ionization detector (PID). For each vapor screening event, a sample tube is filled approximately 1/3 full with the soil sample, capped at both ends, and shaken. The PID probe is then inserted through a small opening in the cap, and a reading is taken after approximately 15 seconds and recorded on the boring log. The remaining soil recovered is removed from the sample tube and described in accordance with the Unified Soil Classification System. For each sampling interval, field estimates of soil type, color, density/consistency, moisture, and grading are recorded on the boring logs.

MONITORING WELL INSTALLATION

Groundwater monitoring wells are constructed of 4-inch diameter, flush-threaded, Schedule 40, polyvinyl chloride (PVC) blank and screened casing (0.020-inch screen slot size). Groundwater monitoring wells typically extend up to 10 feet above and at least 15 feet below the groundwater surface, provided that no competent clay layer is penetrated. The annular space surrounding the screened casing intervals is backfilled with Number 3 Monterey sand (filter pack) to approximately 2 feet above the top of the screened section. During groundwater monitoring well construction, the filter pack is completed by surging with a rig-mounted surge block.

A 3-foot thick bentonite annular seal is placed above the well filter pack. The remaining annular space is sealed with a bentonite grout to the surface. Utility access boxes are installed slightly above grade at the surface, and locking, watertight caps are installed to prevent unauthorized access to the well and limit infiltration of surface fluids.

FLUID-LEVEL MONITORING

Fluid levels are monitored in the well using an electronic interface probe with conductance sensors. The presence of liquid-phase hydrocarbons is verified using a hydrocarbon-reactive paste or using an interface probe. The depth to liquid-phase hydrocarbons and water is measured relative to the top of casing.

GROUNDWATER PURGING AND SAMPLING

Groundwater monitoring wells are purged and sampled in accordance with standard regulatory protocol. During purging activities, temperature, pH, and specific conductance are typically measured. Purging is considered complete when these parameters vary less than 10 percent from previous readings, or when four casing volumes of fluid have been removed. Samples are collected without further purging if the well does not recharge within 2 hours to 80 percent of its volume before purging. Monitoring wells containing liquid-phase hydrocarbons are typically not sampled.

The purged water is either pumped directly into a licensed vacuum truck or temporarily stored in labeled, Department of Transportation approved 55-gallon drums prior to transport to an appropriate disposal/recycling facility.

Groundwater samples are collected by lowering a 1.5-inch diameter, bottom-fill, disposable polyethylene bailer just below the static water level in the well. The samples are carefully transferred from the bailer to 1-liter and/or 40-milliliter glass containers. The sample containers are filled to zero headspace and fitted with Teflon-sealed caps. Samples are labeled with the project number, well number, sample date, and sampler's initials. Samples are chilled at approximately 4 degrees Celsius prior to analysis by a state-certified laboratory.

CHAIN OF CUSTODY PROTOCOL

Chain of custody protocol is followed for all soil and groundwater samples selected for laboratory analysis. The chain of custody form accompanies the samples from the sampling locality to the laboratory, providing a continuous record of possession prior to analysis.

DECONTAMINATION

Drilling equipment is decontaminated by steam cleaning before being brought onsite. Prior to use, the sampler and sampling tubes are brush-scrubbed in a Liqui-nox and potable water solution, and rinsed twice in clean potable water. Sampling equipment and tubes are also decontaminated before each sample is collected to avoid cross-contamination between borings.

Groundwater purging and sampling equipment that could come into contact with well fluids is either dedicated to a well or cleaned prior to each use in a Liqui-nox solution followed by two tap water rinses.

APPENDIX B

SITE SAFETY PLAN

Prepared for Activities Performed at:
GreenPark Ranch
Simi Valley, California
Project No. 01-402-0002-21

1.0 INTRODUCTION

This plan has been prepared in conformity with the Miller Brooks Environmental, Inc. (Miller Brooks) Health and Safety Program. It addresses those activities associated with site assessment and will be implemented during the site investigations, remediation and related field work. Compliance with this site safety plan (SSP) is required of all Miller Brooks personnel and subcontractors who enter the site. The subcontractors may elect to modify these provisions, but only to upgrade or increase the safety requirements, and only with the concurrence of Miller Brooks. The requirements and parameters identified in this SSP will be subject to modification as warranted by existing site conditions or as work progresses. However, no changes will be made without the prior approval of the Site Safety Officer.

2.0 AUTHORITY FOR SITE SAFETY

The Miller Brooks Project Manager, as site safety officer, has overall responsibility for the development, coordination, and implementation of the SSP and its conformity with the Miller Brooks Corporate Health and Safety Plan. The Project Manager is also responsible for field implementation of the SSP. This will include communicating the site-specific requirements to the project personnel and subcontractors working at the site, and assuring compliance with the Corporate Health and Safety Plan. In the event that the Project Manager is unable to perform these duties, site safety responsibilities may be delegated to a designated alternate safety officer. The Project Manager and/or alternate safety officer may suspend or modify work practices or dismiss subcontractors whose conduct does not meet the requirements specified in this SSP. The site safety officer will be responsible for initiating emergency response procedures, if necessary.

3.0 SITE PERSONNEL

Onsite personnel must initially complete a 40-hour hazardous materials training course, as required by the Code of Federal Regulations (CFR) 1910.120. Thereafter, personnel are required to annually complete an 8-hour refresher course. Additionally, personnel will be required to document their full understanding of this SSP before admission to the site, by signing the compliance log at the end of this SSP. Appropriate personal protective equipment will be available and used, as necessary, by onsite project personnel.

4.0 SAFETY AND ORIENTATION MEETING

Prior to commencement of work, the designated site safety officer will conduct a site-specific training session (tailgate meeting) to review project tasks before beginning work, and to make personnel aware of potential physical hazards, chemical hazards, and safe work practices. Material Safety Data Sheets (MSDS) will be made available, as appropriate.

5.0 POTENTIAL SITE HAZARDS

Site investigation and remediation activities to be performed include excavation, soil sampling, and stock piling. Physical and chemical hazards that may be encountered onsite include those associated with operating mechanical equipment and dealing with potentially hazardous chemicals. The most immediate hazard is likely that of physical injury to onsite personnel from machinery. Chemical/elements of concern identified at the site include lead and petroleum hydrocarbons in various phases (adsorbed and/or vapor) may be present in the subsurface at the site. The hazard potential associated with the presence of some elements and hydrocarbons includes vapor build-up in, and/or escaping from, excavations, and contaminated soil stockpiled and moved around the site.

5.1 PHYSICAL HAZARDS

Potential hazards to personal safety at the site include the following:

1. Explosion and fire
   Petroleum products are highly flammable. Liquid petroleum product readily vaporizes from standing pools or saturated soil. Ignition sources of any kind (e.g., engines, impact sparking, and heat or arc from inappropriate equipment or instrumentation) pose a major explosion and fire hazard.

2. Injury from operation of drilling and excavation equipment

3. Electrocution from buried or overhead power lines

4. Noise exposure from the operation of heavy equipment

5. Heat stress

6. Cold exposure

7. Biologic hazards

5.2 CHEMICAL HAZARDS

Previous sampling and analytical data indicated that petroleum hydrocarbons, volatile organic compounds (VOCs), and metals may be encountered in the subsurface. These chemicals are volatile, flammable, and moderately to extremely toxic.

6.0 HAZARD ASSESSMENT

Consistent efforts will be made throughout the project to evaluate the chemical and physical hazards described above. Fire, explosion, and VOCs exposure hazards will be evaluated in the field using a Minirae Photoionization Detector (PID) and/or portable combustible gas indicator (CGI). The calibration and maintenance of all monitoring equipment will be conducted in accordance with the manufacturer recommendations.

7.0 HAZARD REDUCTION

7.1 GENERAL PROCEDURES

Underground utilities will be located and identified prior to any operation. During drilling procedures, subsurface areas containing pea-gravel and surface areas previously sawcut or repaved will be avoided unless cleared by the Project Manager. Field personnel will contact the Project Manager if pea-gravel and/or red concrete are encountered during subsurface excavation.

No confined space entry is anticipated during the course of these operations. However, if such a situation is encountered, workers are prohibited from entering confined spaces until the company plan dealing with confined spaces is implemented.

7.2 SAFETY INSPECTIONS

Walk-through safety inspections of the work area will be conducted daily before the start of work and as conditions warrant. The results of these surveys will be communicated to the work crews during regularly scheduled "tailgate" safety meetings. The safety procedures and the day's planned operations will be discussed at these meetings.

7.3 ENVIRONMENTAL CONTROLS

The following environmental controls will be implemented as appropriate:

1. Excavation of VOC contaminated soil will be in accordance with South Coast Air Quality Management District Rule 1166 and other applicable regulations.

2. Contaminated soil will be covered with clean soil and/or sprayed with water or deodorizing chemicals in order to reduce vaporization of VOC.

3. Drilling equipment will be bonded and grounded during the operations to control ignition sources.

7.4 ENGINEERING CONTROLS

Access to work areas will be limited by the site safety officer to essential personnel. Drilling areas and open excavations will be cordoned off with delineators, barriers, and/or taping. Excavated soil will be stockpiled and covered, or stored in closed drums or roll-off bins. Drums and/or roll-off bins containing soil or water will be clearly labeled. Chemical/elements and hydrocarbon-affected soil or water will be removed from the site at the earliest opportunity.

7.5 PERSONAL PROTECTIVE EQUIPMENT

Field personnel involved in site assessment and remediation activities are required to be prepared with the following personal protective equipment:

- Hard hats
- Half-face air purifying respirators with organic vapor cartridges and dust/mist filters
- Safety glasses with side-shields, or splash goggles
- Tyvek coveralls and other suitable work clothing
- Chemical-resistant gloves
- Steel-toe boots or boot covers
- Ear plugs or other suitable hearing protection
- Traffic safety vests

7.6 PROTECTION FROM AIRBORNE TOXIC CHEMICALS

Workers will be required to wear half-face air purifying respirators with organic vapor cartridges under the following circumstances:

1. If the worker is continuously exposed throughout the day to VOC vapors that exceed the permissible exposure level - time-weighted average (PEL-TWA) for benzene (300 ppm).

2. If the worker is exposed at any time to VOC vapors that exceed the permissible exposure level - short-term exposure limit (PEL-STEL) for gasoline (500 ppm).

7.7 OTHER PHYSICAL HAZARDS

In general, accidents will be prevented by personal protective equipment, environmental controls, engineering controls, and the exercise of reasonable caution during work activities. Other potential hazards and corresponding precautions include the following:

Physical Contact with Contaminated Soil
Workers who must come in direct contact with VOC-contaminated soil for sampling purposes will be required to wear protective gloves and/or necessary protective clothing to prevent skin contact.

Noise Exposure
Project personnel entering high-noise areas will be required to wear hearing protection (ear plugs or muffs).

Heat Stress
Heat stress can impair worker coordination and judgement, and directly impact health and safety. Heat stress is more likely to occur when personal protective equipment is in use. Project personnel will be provided with beverages, shaded rest areas, and breaks, as needed, to prevent heat stress.

Cold Exposure
To guard against cold injury (frostbite and hypothermia), which is a danger when the temperature and wind-chill factor are low, employees will wear appropriate clothing, have warm shelter readily available, and maintain carefully scheduled work and rest periods.

Biological Hazards
The only biological factors anticipated during operations would be those posed by poisonous plants, insects, animals, and indigenous pathogens. Protective clothing and respiratory equipment can help reduce the chances of exposure. Thorough washing of any exposed body parts and equipment will help protect against infection.

8.0 EMERGENCY RESPONSE

The site safety officer will have controlling authority during an emergency. In the event that this person is not available, the alternate safety officer will be in charge. Emergency response organizations, locations, and contacts are listed at the end of this SSP.

9.0 GENERAL SAFETY REQUIREMENTS

The following requirements will also be observed:

The designated site safety officer has the authority to correct unsafe site conditions. Accidents, injuries, and potentially unsafe working conditions shall be reported to the site safety officer immediately.

Eating, smoking, and drinking will be allowed only in designated offsite areas. Site personnel will wash their hands and faces thoroughly prior to eating or drinking.

Respirators will be cleaned, sanitized, inspected, and maintained by employees after each use.

Fire extinguishers will be onsite for use on equipment or small fires only.

An adequately stocked first aid kit will be onsite during work activities.

Practical engineering and geological information, experience, and accepted practices will be employed, as necessary, to control site safety while carrying out the proposed site assessment and remediation work.

10.0 LIST OF KEY PERSONNEL

Site Safety Officer: (714) 960-4088	Elizabeth A. Robbins Miller Brooks
Alternate Safety Officer: (714) 960-4088	Jennifer Canfield Miller Brooks
Client Contact: (562) 446-4100	Peter Kiesecker Greenpark Holdings, LLC

EMERGENCY SERVICES

The following list provides the location and telephone number for emergency services in the vicinity of the project site. Directions to medical facilities are included below, and a map is attached at the end of this site safety plan.

EMERGENCY TELEPHONE NUMBERS

Police Department:	911
Fire Department:	911

Ambulance: 911

Nearest Hospitals:

Simi Valley Hospital (805) 955-6000

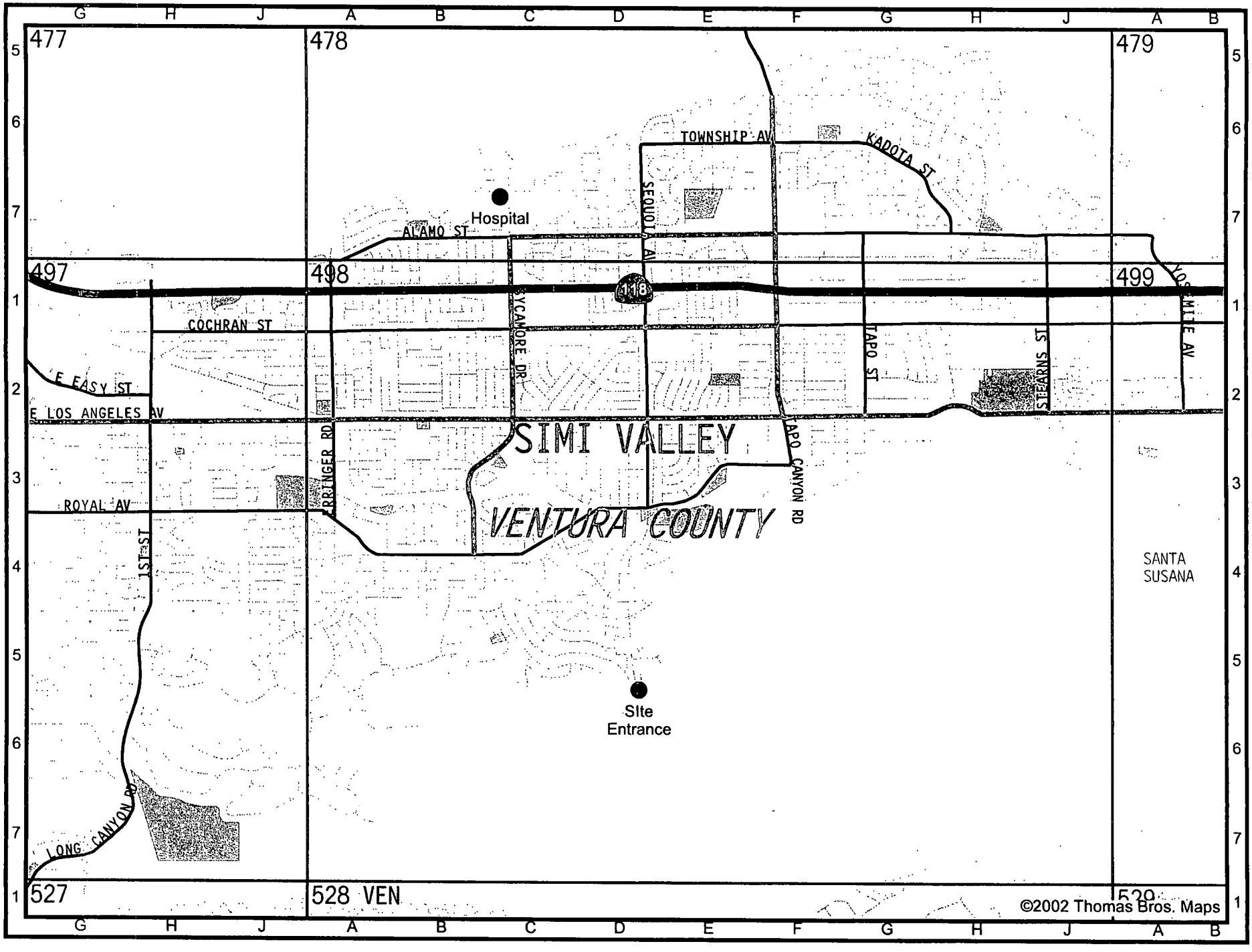
Directions: Exit the site and go north on Sequoia Avenue to Alamo Street. Turn right onto Alamo Street and go west to Sycamore Dr.. The hospital is on the left side of the street. The distance to the hospital from the site is approximately 4 miles.

Poison Control Center: (800) 777-6476

Chemical Transportation Emergency Center (CHEMTREC): (800) 424-9300

Office of Emergency Services (OES): (800) 852-7550

National Response Center (NRC): (800) 424-8802



● *Site Entrance: 1400 Sequoia Av, Simi Valley, CA 93065, 498 D5*

● *Hospital: 1000 Sycamore Dr, Simi Valley, CA 93065, 478 C7*

SITE SAFETY PLAN COMPLIANCE LOG

For Activities Performed at:
GreenPark Ranch

I have read and understand this Site Safety Plan and hereby agree to comply with all safety requirements outlined herein.

Signature: _____ Date: _____
Site Safety Officer, Miller Brooks Environmental, Inc.

Signature: _____ Date: _____
Alternate Safety Officer, Miller Brooks Environmental, Inc.

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

SITE SAFETY PLAN COMPLIANCE LOG
(Continued)

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____

Print Name: _____

Signature: _____ Date: _____

Company: _____ Title: _____