

June 6, 2006

VIA FEDERAL EXPRESS

Preston W. Brooks, Esq.
Cox Castle & Nicholson LLP
2049 Century Park East, 28th Floor
Los Angeles, California 90067-3284

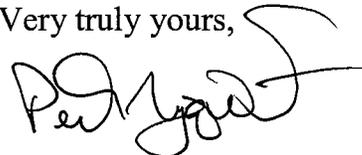
Re: Groundwater Sampling Activities Report, March 2006
GreenPark Runkle Canyon Development, Ventura Country, CA

Dear Preston:

Enclosed please find the Groundwater Sampling Activities report submitted last week to the Los Angeles Regional Water Quality Control Board ("Regional Board") by Miller Brooks Environmental, Inc. ("Miller Brooks") on behalf of GreenPark Runkle Canyon, LLC. As set forth therein, based on current and historical sampling results, Miller Brooks concludes that further groundwater monitoring at wells MW-1 and MW-2 is not warranted and has requested Regional Board approval to abandon the wells. We will continue our efforts to pursue closure of these issues, and keep you apprised of developments.

Should you have any questions concerning this, please feel free to call me.

Very truly yours,



Peter A. Nyquist
WESTON, BENSHOOF,
ROCHEFORT, RUBALCAVA & MacCUISH LLP

PAN/nh
Enclosure



May 25, 2006

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

**SITE: GREENPARK RUNKLE CANYON DEVELOPMENT
SIMI VALLEY, CALIFORNIA**

SUBJECT: GROUNDWATER SAMPLING ACTIVITIES, MARCH 2006

Dear Mr. Backarowski and Mr. Raftery:

Miller Brooks Environmental, Inc. (Miller Brooks), on behalf of GreenPark Runkle Canyon, LLC (GreenPark) is pleased to submit this report for groundwater sampling activities conducted at the GreenPark Runkle Canyon Development in Ventura County, California (Site). Work activities were conducted in response to the Los Angeles Regional Water Quality Control Board (LARWQCB) correspondence dated March 28, 2005 (LARWQCB, 2005), requesting two groundwater sampling events at Wells MW-1 and MW-2. The objective of the groundwater sampling was to determine the presence or absence of perchlorate and n-nitrosodimethylamine (NDMA) in the groundwater beneath the Site. This report presents the results of the second groundwater sampling event, for the period of January through March 2006.

SITE AND VICINITY DESCRIPTION

The 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 Assessor's 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.

GROUNDWATER SAMPLING

Groundwater Sampling – March 27, 2006

On March 27, 2006, Wells MW-1 and MW-2 were gauged and sampled by Miller Brooks. Groundwater levels in the wells were measured using an electronic water-level meter prior to purging and sampling activities. During purging activities, groundwater was monitored for temperature, pH, conductivity and turbidity. Groundwater samples were collected from the wells following purging. A general description of groundwater monitoring and sampling procedures is included with copies of the field data sheets in Appendix A.

Groundwater generated during sampling activities was placed onsite in a labeled, Department of Transportation-approved, 55-gallon drum and was transported offsite on March 28, 2006, for recycling at the Demenno Kerdoon facility in Compton, California. A copy of the non-hazardous waste manifest is included in Appendix B.

Laboratory Analysis

The groundwater samples were analyzed for perchlorate using Environmental Protection Agency (EPA) Methods 314 and 8321A and for NDMA using EPA Method 1625M. Chain of custody protocol was followed for all samples. The analysis of the groundwater samples and trip blanks for perchlorate and NDMA were transported to Severn Trent Laboratory in Sacramento, California. Results of laboratory analysis of groundwater samples are presented in Table 1. Copies of the official laboratory reports and chain of custody records are included in Appendix C.

The laboratory reports were also reviewed by Laboratory Data Consultants, Inc. to assess the validity of the laboratory analysis. A copy of the assessment data is included in Appendix D.

FINDINGS AND CONCLUSIONS

Miller Brooks conducted groundwater gauging and sampling activities at Wells MW-1 and MW-2 on March 27, 2006, at the Greenpark Runkle Canyon property. The findings of the investigation are as follows:

- Groundwater was measured at a depth of 34.17 feet below ground surface (bgs) in Well MW-1 and 33.71 feet bgs in Well MW-2.
- The groundwater samples collected from Wells MW-1 and MW-2 on March 27, 2006, did not contain detectable concentrations of perchlorate.
- The trip blank did not contain detectable perchlorate or NDMA.
- The groundwater sample collected from Well MW-2 on March 27, 2006, showed a detectable NDMA concentration of 2.8 nanograms per liter (ng/L). NDMA was not detected in the sample collected from Well MW-1. The NDMA laboratory data was validated by Laboratory Data Consultants, Inc.

This sampling event constitutes the second and final round of groundwater sampling required by the LARWQCB. Perchlorate has not been detected and validated in groundwater from the wells sampled as part of this exercise to gather additional information. We therefore conclude that perchlorate is not present in groundwater beneath the Site. The detection of NDMA in Well MW-2 at a concentration of 2.8 ng/L is the first validated detection of NDMA in groundwater. A previous detection of NDMA had been recorded for a duplicate sample from Well MW-1, although this result was shown following data assessment to be invalid (Miller Brooks, 2005a). Given the detection of NDMA in this last groundwater sampling event, and the validation of this result, we conclude that NDMA is present in groundwater, albeit it at marginally discernable levels. A comparison of current regulatory standards, advisory levels and goals against the maximum detected concentration of NDMA is presented below along with recommendations for future action.

A California or federal Maximum Contaminant Level (MCL) has not been established for NDMA. In terms of drinking water, the California Department of Health Services (DHS) California Notification Level for NDMA is 10 ng/L. The DHS response level (the level at which DHS recommends that action is taken and that consumers do not drink the water) is 200 ng/L. In February 2006, the Office of Environmental Health Hazard Assessment (OEHHA) published a Draft Public Health Goal (PHG) for N-Nitrosodimethylamine in Drinking Water of 3 ng/L. The proposed PHG of 3 ng/L is based upon an extra cancer risk of 1×10^{-6} for lifetime exposure to NDMA in drinking water and OEHHA judged this level to be adequately protective of lifetime exposure to NDMA in water.

The maximum validated detection of NDMA in groundwater sampled in response to the LARWQCB correspondence dated March 28, 2005 was 2.8 ng/L, which is below the DHS California Notification Level of 10 ng/L, and below the proposed Draft PHG of 3 ng/l by a factor of 3.5 and 1.07 respectively.

Based on current and historical analytical results for perchlorate and NDMA in groundwater, current advisory levels and non-mandatory goals, and current and future planned use of the property, Miller Brooks does not recommend further groundwater monitoring at the Site. Furthermore, Miller Brooks recommends that wells MW-1 and MW-2 be abandoned.

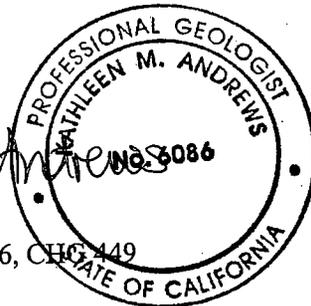
STATEMENT OF LIMITATIONS AND PROFESSIONAL CERTIFICATION

This report was prepared for the sole use of GreenPark Runkle Canyon, LLC. Any other use without the express written consent of Miller Brooks is prohibited. The conclusions herein are based solely upon the agreed written scope of work outlined in this report. Miller Brooks makes no warranties or guarantees as to the accuracy or completeness of information provided or compiled by others. It is possible that information exists beyond the scope of this investigation. Additional information that was not found or available to Miller Brooks at the time of writing this report, may result in modification of the conclusions presented. This report is not a legal opinion. The services performed by Miller Brooks have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently practicing under similar conditions. No other warranty, expressed or implied, is made.

This investigation was supervised or personally conducted by the licensed professional whose signature and license number appears below.

Andrew Brack
Senior Engineer

Kathleen M. Andrews



Kathleen M. Andrews, PG 6086, CHG 449
Senior Hydrogeologist

Attachments: Table 1 - Results of Laboratory Analysis of Water Samples
Figure 1 - Vicinity Map
Figure 2 - Site Plan Showing Groundwater Sample Locations
Appendix A - General Field Procedures and Field Data Sheets
Appendix B - Non-hazardous Waste Manifest
Appendix C - Laboratory Report of Groundwater Samples
Appendix D - Assessment of NDMA Data

REFERENCES

LACRWQCB, 2005: Los Angeles California Regional Water Quality Control Board, 2005, California Water Code Section 13267, Request for Additional Groundwater sampling – GreenPark Runkle Canyon Development, Ventura County, California, March 28.

Miller Brooks, 2005a: Supplemental Report for Groundwater Sampling Activities – GreenPark Runkle Canyon Development, Ventura County, California, Miller Brooks Environmental, Inc., February 9, 2005

Miller Brooks, 2005b: Supplemental Site Assessment Report for Groundwater Investigation Activities – GreenPark Runkle Canyon Development, Ventura County, California, Miller Brooks Environmental, Inc., July 29, 2005

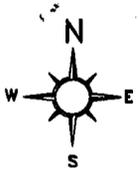
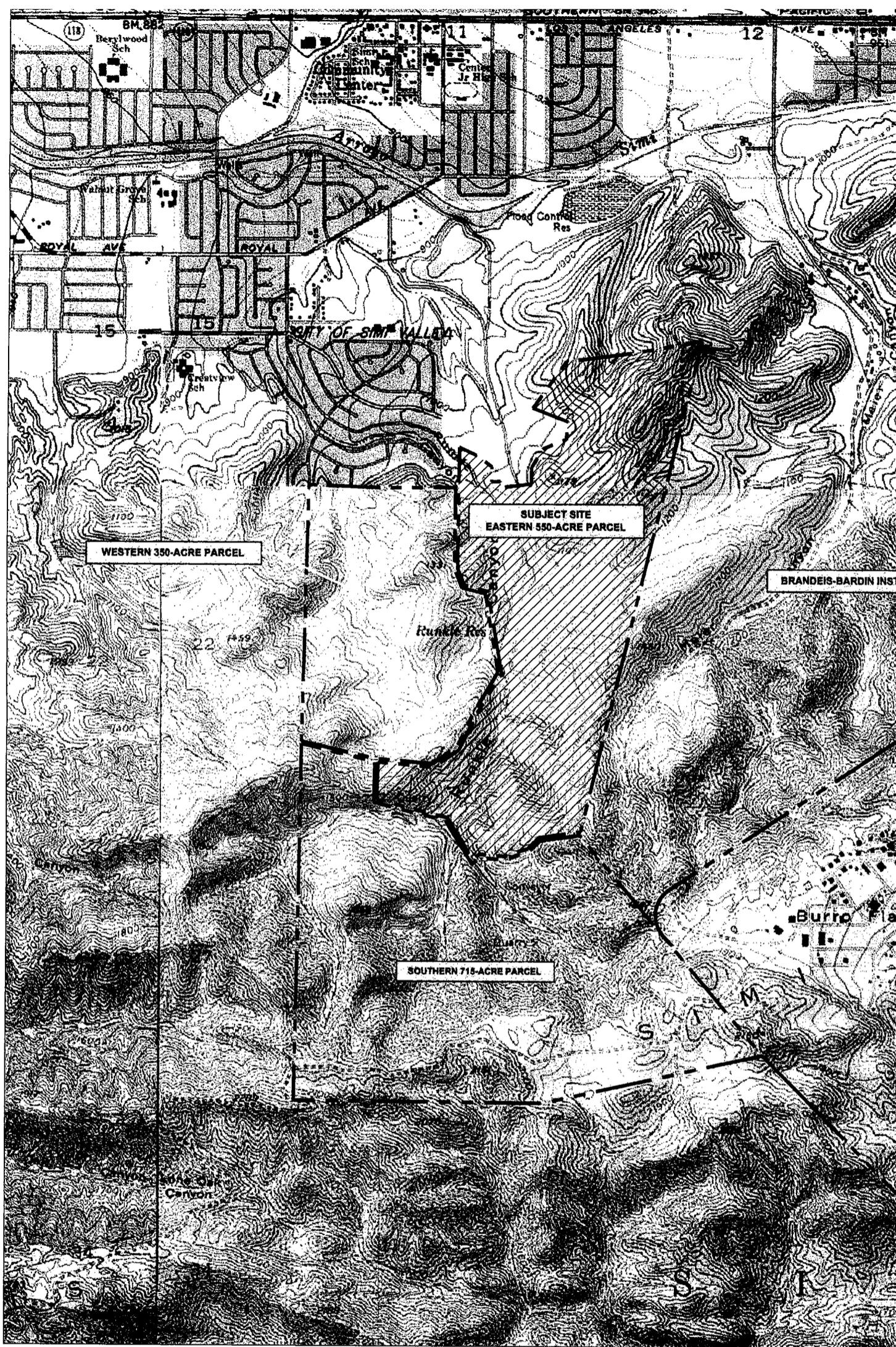
TABLE

TABLE 1
 RESULTS OF LABORATORY ANALYSIS OF GROUNDWATER SAMPLES
 GreenPark Runkle Canyon Development
 Simi Valley, California

Sample ID	Sample Date	Perchlorate (µg/L)		NDMA EPA Method 1625M (ng/L)
		EPA Method 8321A	EPA Method 314.0	
MW-1	06/15/05	ND<0.50	ND<2.0*	ND<2.0
	03/27/06	ND<0.50	ND<2.0*	ND<2.0
MW-2	06/15/05	ND<0.50	ND<2.0*	ND<2.0
	03/27/06	ND<0.50	ND<5.0*	2.8
Trip Blank	06/15/05	--	--	ND<2.0
	03/27/06	ND<0.50	ND<1.0	ND<2.0

Notes:
 EPA = Environmental Protection Agency
 M = modified
 µg/L = micrograms per liter
 NDMA = n-nitrosodimethylamine
 ng/L = nanograms per liter
 ND = not detected at limit indicated
 -- = not analyzed
 * = the reporting limit was elevated due to matrix interference

FIGURES



0 2000 Feet
SCALE

MILLER BROOKS
Environmental, Inc.

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

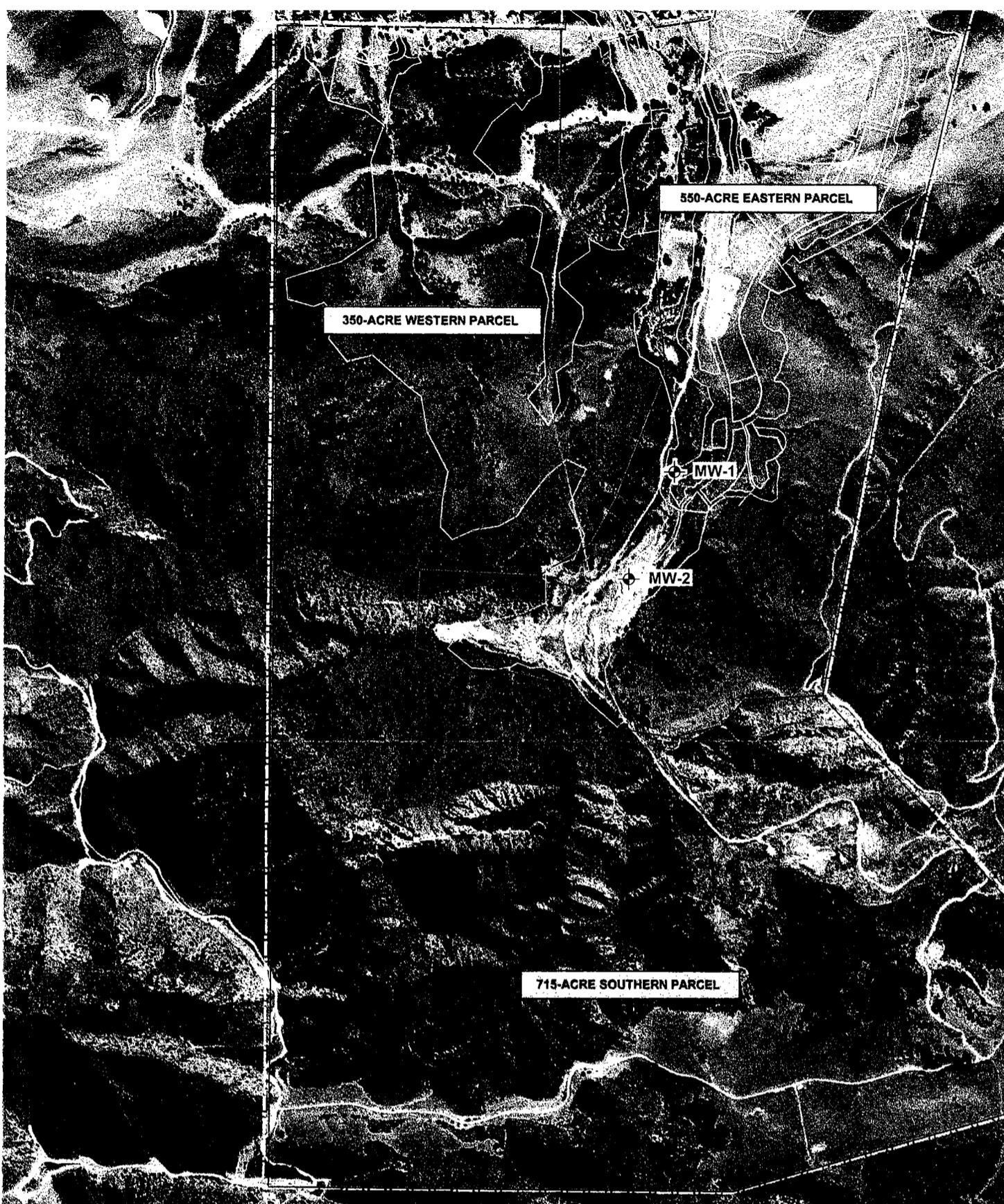
PROJECT NO. 01-406-0002-05

DRAWN BY:
PEL
DATE:
11/21/02
REVISED BY:
DCN
REVISED:
08/28/03
APPROVED BY:
EAR
DATE:
08/28/03

VICINITY

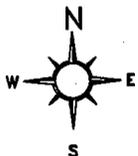
RUNKLE CANYON
SIMI VALLE

FILE: K:\DWGS\RUNKLE RANCH\VICI



LEGEND

- MW-1 GROUNDWATER MONITORING WELL
- PARCEL BOUNDARY
- PROPERTY BOUNDARY



0 1200 FEET
SCALE

	DRAWN BY: DCN	SITE PLAN S GROUNDWATER SAMPLING
	DATE: 07/12/05	
REVISED BY: DCN	GREENPARK RUNKLE CANYON SIMI VALLE	
REVISED: 07/12/05		
2124 MAIN STREET, SUITE 200 HUNTINGTON BEACH, CA. 92648 (714) 960-4088	APPROVED BY: JLC	FILE: K:\DWGS\RUNKLE CANYON\SAR
PROJECT NO. 01-402-0002-04	DATE: 07/12/05	

APPENDIX A

APPENDIX A

GENERAL FIELD PROCEDURES AND FIELD DATA SHEETS

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. If present, 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.

**GROUNDWATER MONITORING WELL
PURGING DATA**

Project Number: 402-0002-04

Date: 3/27/06

General Information

Water-Level Meter: Solinst Decontamination Process: Steam Clean
 Water Quality Meter: Horiba U-10 or Hydac Sampling Equipment: Disposable Bailer
 Purging Equipment: D. P. Wells Sampled By: VV/TTC

Well Purging Data for Monitoring Well: <u>M.W-1</u>								
Start Time	Volume (gal)	pH	Conductivity (mS/cm)	Turbidity (NTU)	O ₂ (mg/l)	Temperature (C)	Salinity (%)	Notes
8:47 AM	0	6.75	3.31	5	8.09	19.1	0.16	FIRST BAILET IN FULL BUCKET.
9:04	5	6.71	3.38	263	8.27	19.1	0.16	
9:25	10	6.83	3.36	263	8.51	18.4	0.16	
9:38	15+	6.68	3.38	999	8.30	19.1	0.17	
Initial depth to water: <u>34.7</u>		Casing Diameter: <u>2</u>		80% Recharge: <u>21.15</u>		WC		
Total well depth: <u>62.05</u>		Minimum Purge Volume: <u>15.84</u>		GAL		Sample Time: _____		

Well Purging Data for Monitoring Well: <u>M.W-2</u>								
Start Time	Volume (gal)	pH	Conductivity (mS/cm)	Turbidity (NTU)	O ₂ (mg/l)	Temperature (C)	Salinity (%)	Notes
9:53 AM	0	6.38	3.52	258	8.65	19.4°	.17	
9:58 AM	2	6.41	3.50	259	9.54	19.0°	.18	
10:05 AM	4	6.42	3.56	356	10.37	19.1°	.18	
10:11 AM	6	6.43	3.57	399	10.39	19.2°	.18	
10:20 AM	8+	6.45	3.60	575	10.40	19.2°	.18	
Initial depth to water: <u>33.71</u>		Casing Diameter: <u>2</u>		80% Recharge: <u>36.52</u>		WC		
Total well depth: <u>47.33</u>		Minimum Purge Volume: <u>8.01</u>		GAL		Sample Time: _____		

APPENDIX B

NO. 653597

NON-HAZARDOUS WASTE DATA FORM

TO BE COMPLETED BY GENERATOR
 TO BE COMPLETED BY TRANSPORTER
 TO BE COMPLETED BY DISPOSER

NAME <u>GREEN PARK RUNKLE CANYON RUNKLE RANCH</u>		EPA I.D. NO.
ADDRESS <u>3030 OLD RANCH PARKWAY SEQUOIA AVE (SOUTHWEST)</u>		PROFILE
CITY, STATE, ZIP <u>SEAL BEACH, CA 90740</u>	<u>SEMI VALLEY, CA</u>	PHONE NO. ()
CONTAINERS: No. <u>1</u>	VOLUME <u>55 gallons</u>	WEIGHT
TYPE: <input checked="" type="checkbox"/> TANK TRUCK <input type="checkbox"/> DUMP TRUCK <input checked="" type="checkbox"/> DRUMS <input type="checkbox"/> CARTONS <input type="checkbox"/> OTHER	<u>DECONTAMINATE SINK/PURGED GROUNDWATER</u>	
WASTE DESCRIPTION <u>NON-HAZARDOUS WATER</u>		GENERATING PROCESS <u>PURGED GROUNDWATER</u>
COMPONENTS OF WASTE	PPM	%
1. <u>WATER</u>		<u>99-100%</u>
2. <u>TPH</u>		<u>< 1.0%</u>
3. <u>VOC's</u>		<u>< 0.1%</u>
4.		
5.		
6.		
7. <u>RESID#123407.02</u>		
8.		
PROPERTIES: pH <u>7-10</u> <input type="checkbox"/> SOLID <input checked="" type="checkbox"/> LIQUID <input type="checkbox"/> SLUDGE <input type="checkbox"/> SLURRY <input type="checkbox"/> OTHER		
HANDLING INSTRUCTIONS: <u>WEAR ALL APPROPRIATE PROTECTIVE CLOTHING.</u>		
THE GENERATOR CERTIFIES THAT THE WASTE AS DESCRIBED IS 100% NON-HAZARDOUS.		
<u>Louise Maathart (RES#123407.02 generator)</u>		<u>3/27/06</u>
TYPED OR PRINTED FULL NAME & SIGNATURE		DATE
NAME <u>B.E.S.I. NASI INC.</u>		EPA I.D. NO.
ADDRESS <u>2571 TOWNE CENTRE DRIVE / 1281 Brea Way Rd</u>		SERVICE ORDER NO.
CITY, STATE, ZIP <u>LAKE FOREST, CA 92510</u>	<u>Brea G. 92821</u>	PICK UP DATE <u>3/29/06</u>
PHONE NO. <u>949-460-5200</u>	<u>714-990-6333</u>	
TRUCK, UNIT, I.D. NO. <u>214/325</u>	<u>JPA to SPW to (MFR)</u>	<u>3/29/06</u>
TYPED OR PRINTED FULL NAME & SIGNATURE		DATE
NAME <u>DENNIS KERDOON</u>		EPA I.D. NO.
ADDRESS <u>2000 N. ALAMEDA STREET</u>		DISPOSAL METHOD
CITY, STATE, ZIP <u>COMPTON, CA 90222</u>		<input type="checkbox"/> LANDFILL <input checked="" type="checkbox"/> OTHER <u>Recycle</u>
PHONE NO. <u>310-537-7100</u>		
<u>Robert Austin Kerdoon</u>		<u>03-29-06</u>
TYPED OR PRINTED FULL NAME & SIGNATURE		DATE

GEN	OLD/NEW	L	A	TONS	DISCREPANCY
TRANS		S	B		
CIQ	RT/CD	HWDF	NONE		

APPENDIX C



STL

STL Sacramento
880 Riverside Parkway
West Sacramento, CA 95605

Tel: 916 373 5600 Fax: 916 372 1059
www.stl-inc.com

April 14, 2006

STL SACRAMENTO PROJECT NUMBER: G6C290294
PO/CONTRACT: 402-0002-04

Jennie Canfield
Miller Brooks Environmental
2124 Main Street Suite 200
Huntington Beach, CA 92648

Dear Ms. Canfield,

This report contains the analytical results for the samples received under chain of custody by STL Sacramento on March 29, 2006. These samples are associated with your RUNKLE CANYON project.

The test results in this report meet all NELAC requirements for parameters that accreditation is required or available. Any exceptions to NELAC requirements are noted in the case narrative. The case narrative is an integral part of this report.

If you have any questions, please feel free to call me at (916) 374-4362.

Sincerely,

Amity Allman
Project Manager

Pravani Pillay
Senior Project Manager

CC: Richard Amano with Laboratory Data Consultants

CASE NARRATIVE

STL SACRAMENTO PROJECT NUMBER G6C290294

General Comments

The chain of custody instructed the laboratory to place sample 3, labeled duplicate, on hold. The client was notified on April 14, 2006 and elected not to have the sample analyzed.

WATER, 314.0, Perchlorate

Sample: 1, 2

The sample required a dilution due to matrix interference and the reporting limit was raised accordingly. The sample has been properly "G" flagged.

There were no other anomalies associated with this project.

STL Sacramento Certifications/Accreditations

Certifying State	Certificate #	Certifying State	Certificate #
Alaska	UST-055	Oregon*	CA 200005
Arizona	AZ0616	Pennsylvania	68-1272
Arkansas	04-067-0	South Carolina	87014002
California*	01119CA	Texas	TX-270-2004A
Colorado	NA	Utah*	QUAN1
Connecticut	PH 0691	Virginia	00178
Florida*	E87570	Washington	C087
Georgia	960	West Virginia	9930C-334
Hawaii	NA	Wisconsin	998204680
Louisiana*	01944	WFESC	NA
Michigan	9947	USACE	NA
Nevada	CA44	USDA Foreign Plant	37-82605
New Jersey*	CA005	USDA Foreign Soil	S-46613
New York*	11666		

*NELAP accredited. A more detailed parameter list is available upon request. Update 1/27/05

QC Parameter Definitions

QC Batch: The QC batch consists of a set of up to 20 field samples that behave similarly (i.e., same matrix) and are processed using the same procedures, reagents, and standards at the same time.

Method Blank: An analytical control consisting of all reagents, which may include internal standards and surrogates, and is carried through the entire analytical procedure. The method blank is used to define the level of laboratory background contamination.

Laboratory Control Sample and Laboratory Control Sample Duplicate (LCS/LCSD): An aliquot of blank matrix spiked with known amounts of representative target analytes. The LCS (and LCSD as required) is carried through the entire analytical process and is used to monitor the accuracy of the analytical process independent of potential matrix effects. If an LCSD is performed, it may also be used to evaluate the precision of the process.

Duplicate Sample (DU): Different aliquots of the same sample are analyzed to evaluate the precision of an analysis.

Surrogates: Organic compounds not expected to be detected in field samples, which behave similarly to target analytes. These are added to every sample within a batch at a known concentration to determine the efficiency of the sample preparation and analytical process.

Matrix Spike and Matrix Spike Duplicate (MS/MSD): An MS is an aliquot of a matrix fortified with known quantities of specific compounds and subjected to an entire analytical procedure in order to indicate the appropriateness of the method for a particular matrix. The percent recovery for the respective compound(s) is then calculated. The MSD is a second aliquot of the same matrix as the matrix spike, also spiked, in order to determine the precision of the method.

Isotope Dilution: For isotope dilution methods, isotopically labeled analogs (internal standards) of the native target analytes are spiked into the sample at time of extraction. These internal standards are used for quantitation, and monitor and correct for matrix effects. Since matrix effects on method performance can be judged by the recovery of these analogs, there is little added benefit of performing MS/MSD for these methods. MS/MSD are only performed for client or QAPP requirements.

Control Limits: The reported control limits are either based on laboratory historical data, method requirements, or project data quality objectives. The control limits represent the estimated uncertainty of the test results.

Sample Summary

G6C290294

<u>WO#</u>	<u>Sample #</u>	<u>Client Sample ID</u>	<u>Sampling Date</u>	<u>Received Date</u>
H17H1	1	MW-2	3/27/2006 10:30 AM	3/29/2006 01:20 PM
H17H9	2	MW-1	3/27/2006 11:00 AM	3/29/2006 01:20 PM
H17JD	4	TRIP BLANK	3/27/2006	3/29/2006 01:20 PM

Notes(s):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity, pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight

STL-4124 (0901)
 Client: **MILLER BROOKS ENV**
 Address: **2124 MAIN ST #200**
 City: **H.B. CA** State: **CA** Zip Code: **92648**
 Project Name and Location (State): **RUNKLE CANYON 402-0002-04**
 Contract/Purchase Order/Quote No. _____
 Project Manager: **JENNIE CAMFIELD**
 Telephone Number (Area Code)/Fax Number: **714 500 5408**
 Date: **3-27-06**
 Lab Number: _____
 Chain of Custody Number: **145580**
 Page **1** of **1**

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix					Containers & Preservatives					Analysis (Attach list if more space is needed)	Special Instructions/ Conditions of Receipt	
			Air	Aqueous	Sol.	Sol.	Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH			
MW-2	3-27-06	10:30	X					X							2 1 L ambers &
MW-1	3/27/06	11:00	X					X							2 250 mL polys
Duplicate	3-27-06	-	X					X							per sample
TRIP Blank	3-27-06	-	X					X							(1 for trip blanks)
															Do not analyze
															Duplicate at
															this time - gc

Possible Hazard Identification
 Non-Hazard Flammable Skin Irritant Poison B Unknown Disposal By Lab Archive For _____ Months
 Turn Around Time Required Return To Client
 24 Hours 48 Hours 7 Days 14 Days 21 Days Other _____
 Relinquished By: **Wally New** Date: **3-28-06** Time: **4:00pm**
 Relinquished By: **Walter Visca** Date: _____ Time: _____
 Relinquished By: _____ Date: _____ Time: _____
 Relinquished By: _____ Date: _____ Time: _____
 Received By: **Cly** Date: **3-29-06** Time: **1:30**
 Received By: _____ Date: _____ Time: _____
 Received By: _____ Date: _____ Time: _____
 Comments: _____
 (A fee may be assessed if samples are retained longer than 1 month)
 QC Requirements (Specify): _____

WATER, 8321A, Perchlorate

Miller Brooks Environmental Inc

Client Sample ID: MW-2

Dissolved HPLC

Lot-Sample #....: G6C290294-001 Work Order #....: H17H11AA Matrix.....: WATER
Date Sampled....: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/30/06 Analysis Date...: 03/31/06
Prep Batch #....: 6089454
Dilution Factor: 1 Method.....: SW846 8321A

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>
Perchlorate	ND	0.50	ug/L

Miller Brooks Environmental Inc

Client Sample ID: MW-1

Dissolved HPLC

Lot-Sample #...: G6C290294-002 Work Order #...: H17H91AA Matrix.....: WATER
Date Sampled...: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/30/06 Analysis Date...: 03/31/06
Prep Batch #...: 6089454
Dilution Factor: 1 Method.....: SW846 8321A

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>
Perchlorate	ND	0.50	ug/L

Miller Brooks Environmental Inc

Client Sample ID: TRIP BLANK

Dissolved HPLC

Lot-Sample #...: G6C290294-004 Work Order #...: H17JD1AA Matrix.....: WATER
Date Sampled...: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/30/06 Analysis Date...: 03/31/06
Prep Batch #...: 6089454
Dilution Factor: 1 Method.....: SW846 8321A

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>
Perchlorate	ND	0.50	ug/L

QC DATA ASSOCIATION SUMMARY

G6C290294

Sample Preparation and Analysis Control Numbers

<u>SAMPLE#</u>	<u>MATRIX</u>	<u>ANALYTICAL METHOD</u>	<u>LEACH BATCH #</u>	<u>PREP BATCH #</u>	<u>MS RUN#</u>
001	WATER	SW846 8321A		6089454	6089291
	WATER	CFR136A 1625 Modi		6090294	
002	WATER	SW846 8321A		6089454	6089291
	WATER	CFR136A 1625 Modi		6090294	
004	WATER	SW846 8321A		6089454	
	WATER	CFR136A 1625 Modi		6090294	

METHOD BLANK REPORT

HPLC

Client Lot #...: G6C290294 Work Order #...: H2A3L1AA Matrix.....: WATER
MB Lot-Sample #: G6C300000-454
Prep Date.....: 03/30/06
Analysis Date...: 03/31/06 Prep Batch #...: 6089454
Dilution Factor: 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u>		<u>METHOD</u>
		<u>LIMIT</u>	<u>UNITS</u>	
Perchlorate	ND	0.50	ug/L	SW846 8321A

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE DATA REPORT

HPLC

Client Lot #....: G6C290294 Work Order #....: H2A3L1AC Matrix.....: WATER
 LCS Lot-Sample#: G6C300000-454
 Prep Date.....: 03/30/06 Analysis Date...: 03/31/06
 Prep Batch #....: 6089454
 Dilution Factor: 1

<u>PARAMETER</u>	<u>SPIKE</u> <u>AMOUNT</u>	<u>MEASURED</u> <u>AMOUNT</u>	<u>UNITS</u>	<u>PERCENT</u> <u>RECOVERY</u>	<u>METHOD</u>
Perchlorate	5.00	4.93	ug/L	99	SW846 8321A

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

HPLC

Client Lot #...: G6C290294 Work Order #...: H2A3L1AC Matrix.....: WATER
LCS Lot-Sample#: G6C300000-454
Prep Date.....: 03/30/06 Analysis Date...: 03/31/06
Prep Batch #...: 6089454
Dilution Factor: 1

<u>PARAMETER</u>	<u>PERCENT</u> <u>RECOVERY</u>	<u>RECOVERY</u> <u>LIMITS</u>	<u>METHOD</u>
Perchlorate	99	(76 - 114)	SW846 8321A

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

MATRIX SPIKE SAMPLE DATA REPORT

HPLC

Client Lot #...: G6C290294 Work Order #...: H17H11AE-MS Matrix.....: WATER
 MS Lot-Sample #: G6C290294-001 H17H11AF-MSD
 Date Sampled...: 03/27/06 Date Received...: 03/29/06
 Prep Date.....: 03/30/06 Analysis Date...: 03/31/06
 Prep Batch #...: 6089454
 Dilution Factor: 1

PARAMETER	SAMPLE		SPIKE		MEASRD		PERCNT		METHOD
	AMOUNT	AMT	AMOUNT	UNITS	RECVRY	RPD			
Perchlorate	ND	5.00	4.84	ug/L	97		SW846 8321A		
	ND	5.00	5.02	ug/L	100	3.7	SW846 8321A		

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.
 Bold print denotes control parameters

MATRIX SPIKE SAMPLE EVALUATION REPORT

HPLC

Client Lot #...: G6C290294 Work Order #...: H17H11AE-MS Matrix.....: WATER
 MS Lot-Sample #: G6C290294-001 H17H11AF-MSD
 Date Sampled...: 03/27/06 Date Received...: 03/29/06
 Prep Date.....: 03/30/06 Analysis Date...: 03/31/06
 Prep Batch #...: 6089454
 Dilution Factor: 1

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>
Perchlorate	97	(76 - 114)			SW846 8321A
	100	(76 - 114)	3.7	(0-50)	SW846 8321A

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

WATER, 1625 Modified, NDMA

Miller Brooks Environmental Inc

Client Sample ID: MW-2

Trace Level Organic Compounds

Lot-Sample #....: G6C290294-001 Work Order #....: H17H11AD Matrix.....: WATER
Date Sampled....: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/31/06 Analysis Date...: 04/06/06
Prep Batch #....: 6090294
Dilution Factor: 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>
N-Nitrosodimethylamine	2.8	2.0	ng/L	CFR136A 1625 Modi
<u>INTERNAL STANDARDS</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>		
N-Nitrosodimethylamine-d6	43	(25 - 150)		

Miller Brooks Environmental Inc

Client Sample ID: MW-1

Trace Level Organic Compounds

Lot-Sample #...: G6C290294-002 Work Order #...: H17H91AD Matrix.....: WATER
Date Sampled...: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/31/06 Analysis Date...: 04/06/06
Prep Batch #...: 6090294
Dilution Factor: 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>
N-Nitrosodimethylamine	ND	2.0	ng/L	CFR136A 1625 Modi
<u>INTERNAL STANDARDS</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>		
N-Nitrosodimethylamine-d6	43	(25 - 150)		

Miller Brooks Environmental Inc

Client Sample ID: TRIP BLANK

Trace Level Organic Compounds

Lot-Sample #....: G6C290294-004 Work Order #....: H17JD1AD Matrix.....: WATER
Date Sampled....: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/31/06 Analysis Date...: 04/06/06
Prep Batch #....: 6090294
Dilution Factor: 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>
N-Nitrosodimethylamine	ND	2.0	ng/L	CFR136A 1625 Modi
<u>INTERNAL STANDARDS</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>		
N-Nitrosodimethylamine-d6	42	(25 - 150)		

QC DATA ASSOCIATION SUMMARY

G6C290294

Sample Preparation and Analysis Control Numbers

<u>SAMPLE#</u>	<u>MATRIX</u>	<u>ANALYTICAL METHOD</u>	<u>LEACH BATCH #</u>	<u>PREP BATCH #</u>	<u>MS RUN#</u>
001	WATER	CFR136A 1625 Modi		6090294	
002	WATER	CFR136A 1625 Modi		6090294	
004	WATER	CFR136A 1625 Modi		6090294	

METHOD BLANK REPORT

Trace Level Organic Compounds

Client Lot #...: G6C290294 Work Order #...: H2DPJ1AA Matrix.....: WATER
MB Lot-Sample #: G6C310000-294
Prep Date.....: 03/31/06
Analysis Date...: 04/06/06 Prep Batch #...: 6090294
Dilution Factor: 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>DETECTION</u> <u>LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>
N-Nitrosodimethylamine	ND	2.0	ng/L	CFR136A 1625 Modi

<u>INTERNAL STANDARDS</u>	<u>PERCENT</u> <u>RECOVERY</u>	<u>RECOVERY</u> <u>LIMITS</u>
N-Nitrosodimethylamine-d6	41	(25 - 150)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE DATA REPORT

Trace Level Organic Compounds

Client Lot #....: G6C290294 Work Order #....: H2DPJ1AC-LCS Matrix.....: WATER
 LCS Lot-Sample#: G6C310000-294 H2DPJ1AD-LCSD
 Prep Date.....: 03/31/06 Analysis Date...: 04/06/06
 Prep Batch #....: 6090294
 Dilution Factor: 1

<u>PARAMETER</u>	<u>SPIKE AMOUNT</u>	<u>MEASURED AMOUNT</u>	<u>UNITS</u>	<u>PERCENT RECOVERY</u>	<u>RPD</u>	<u>METHOD</u>
N-Nitrosodimethylamine	100	108	ng/L	108		CFR136A 1625 Modifie
	100	106	ng/L	106	1.4	CFR136A 1625 Modifie

<u>INTERNAL STANDARD</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>
N-Nitrosodimethylamine-d6	42	(25 - 150)
	40	(25 - 150)

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

LABORATORY CONTROL SAMPLE EVALUATION REPORT

Trace Level Organic Compounds

Client Lot #...: G6C290294 Work Order #...: H2DPJ1AC-LCS Matrix.....: WATER
 LCS Lot-Sample#: G6C310000-294 H2DPJ1AD-LCSD
 Prep Date.....: 03/31/06 Analysis Date...: 04/06/06
 Prep Batch #...: 6090294
 Dilution Factor: 1

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>
N-Nitrosodimethylamine	108	(70 - 130)			CFR136A 1625 Modifie
	106	(70 - 130)	1.4	(0-20)	CFR136A 1625 Modifie

<u>INTERNAL STANDARD</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>
N-Nitrosodimethylamine-d6	42	(25 - 150)
	40	(25 - 150)

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Bold print denotes control parameters

WATER, 314.0, Perchlorate

Miller Brooks Environmental Inc

Client Sample ID: MW-2

General Chemistry

Lot-Sample #...: G6C290294-001
Date Sampled...: 03/27/06

Work Order #...: H17H1
Date Received...: 03/29/06

Matrix.....: WATER

<u>PARAMETER</u>	<u>RESULT</u>	<u>RL</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>PREP BATCH #</u>
Perchlorate	ND G	5.0	ug/L	MCAWW 314.0	04/11/06	6102359

Dilution Factor: 5

NOTE(S) :

RL Reporting Limit

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

Miller Brooks Environmental Inc

Client Sample ID: MW-1

General Chemistry

Lot-Sample #...: G6C290294-002
Date Sampled...: 03/27/06

Work Order #...: H17H9
Date Received...: 03/29/06

Matrix.....: WATER

<u>PARAMETER</u>	<u>RESULT</u>	<u>RL</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>PREP BATCH #</u>
Perchlorate	ND G	2.0	ug/L	MCAWW 314.0	04/11/06	6102359

Dilution Factor: 2

NOTE(S):

RL Reporting Limit

G Elevated reporting limit. The reporting limit is elevated due to matrix interference.

Miller Brooks Environmental Inc

Client Sample ID: TRIP BLANK

General Chemistry

Lot-Sample #...: G6C290294-004
Date Sampled...: 03/27/06

Work Order #...: H17JD
Date Received...: 03/29/06

Matrix.....: WATER

<u>PARAMETER</u>	<u>RESULT</u>	<u>RL</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>PREP BATCH #</u>
Perchlorate	ND	1.0	ug/L	MCAWW 314.0	04/11-04/12/06	6102359

Dilution Factor: 1

QC DATA ASSOCIATION SUMMARY

G6C290294

Sample Preparation and Analysis Control Numbers

<u>SAMPLE#</u>	<u>MATRIX</u>	<u>ANALYTICAL METHOD</u>	<u>LEACH BATCH #</u>	<u>PREP BATCH #</u>	<u>MS RUN#</u>
001	WATER	MCAWW 314.0		6102359	6102204
002	WATER	MCAWW 314.0		6102359	6102204
004	WATER	MCAWW 314.0		6102359	6102204

METHOD BLANK REPORT

General Chemistry

Client Lot #....: G6C290294

Matrix.....: WATER

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u> <u>LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION-</u> <u>ANALYSIS DATE</u>	<u>PREP</u> <u>BATCH #</u>
Perchlorate	ND	Work Order #: H24EX1AA 1.0	ug/L	MB Lot-Sample #: MCAWW 314.0	G6D120000-359 04/11/06	6102359

Dilution Factor: 1

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE DATA REPORT

General Chemistry

Lot-Sample #...: G6C290294

Matrix.....: WATER

PARAMETER	SPIKE AMOUNT	MEASURED AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION- ANALYSIS DATE	PREP BATCH #
Perchlorate							WO#:H24EX1AC-LCS/H24EX1AD-LCSD LCS Lot-Sample#: G6D120000-359	
	20.0	19.4	ug/L	97		MCAWW 314.0	04/11/06	6102359
	20.0	19.2	ug/L	96	1.1	MCAWW 314.0	04/11/06	6102359
				Dilution Factor: 1				

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE EVALUATION REPORT

General Chemistry

Lot-Sample #....: G6C290294

Matrix.....: WATER

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>PREP BATCH #</u>
Perchlorate		WO#:H24EX1AC-LCS/H24EX1AD-LCSD LCS Lot-Sample#: G6D120000-359					
	97	(85 - 115)			MCAWW 314.0	04/11/06	6102359
	96	(85 - 115)	1.1	(0-15)	MCAWW 314.0	04/11/06	6102359
		Dilution Factor: 1					

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

MATRIX SPIKE SAMPLE DATA REPORT

General Chemistry

Client Lot #...: G6C290294
 Date Sampled...: 04/05/06

Date Received...: 04/07/06

Matrix.....: WATER

PARAMETER	SAMPLE AMOUNT	SPIKE AMT	MEASRD AMOUNT	UNITS	PERCNT RECVRY	RPD	METHOD	PREPARATION- ANALYSIS DATE	PREP BATCH #
Perchlorate			WO#: H2TLD1AD-MS/H2TLD1AE-MSD MS Lot-Sample #: G6D070208-004						
ND	10.0		10.1	ug/L	101		MCAWW 314.0	04/11/06	6102359
ND	10.0		10.5	ug/L	105	3.8	MCAWW 314.0	04/11/06	6102359

Dilution Factor: 1

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

MATRIX SPIKE SAMPLE EVALUATION REPORT

General Chemistry

Client Lot #....: G6C290294
 Date Sampled....: 04/05/06

Date Received...: 04/07/06

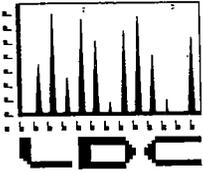
Matrix.....: WATER

PARAMETER	PERCENT RECOVERY		RPD		METHOD	PREPARATION-	PREP
	RECOVERY	LIMITS	RPD	LIMITS		ANALYSIS DATE	BATCH #
Perchlorate			WO#: H2TLD1AD-MS/H2TLD1AE-MSD		MS Lot-Sample #:	G6D070208-004	
	101	(80 - 120)			MCAWW 314.0	04/11/06	6102359
	105	(80 - 120)	3.8	(0-20)	MCAWW 314.0	04/11/06	6102359
	Dilution Factor: 1						

NOTE(S) :

Calculations are performed before rounding to avoid round-off errors in calculated results.

APPENDIX D



LABORATORY DATA CONSULTANTS, INC.

7750 El Camino Real, Suite 2L Carlsbad, CA 92009 Phone: 760/634-0437 Fax: 760/634-0439

May 9, 2006

Miller Brooks Environmental
2124 Main Street, Suite 200
Huntington Beach, CA 92648
ATTN: Ms. Jennie Canfield

SUBJECT: Runkle Canyon, Data Validation

Dear Ms. Canfield,

Enclosed is the final validation report for the fraction listed below. This SDG was received on May 5, 2005. Attachment 1 is a summary of the samples that were reviewed for each analysis.

LDC Project # 14864:

SDG #

Fraction

G6C290294

N-Nitrosodimethylamine

The data validation was performed under EPA Level IV guidelines. The analyses were validated using the following documents, as applicable to each method:

- USEPA, Contract Laboratory Program National Functional Guidelines for Organic Data Review, October 1999

Please feel free to contact us if you have any questions.

Sincerely,

Pei Geng
Project Manager/Senior Chemist

**Runkle Canyon
Data Validation Reports
LDC# 14864**

N-Nitrosodimethylamine

**Laboratory Data Consultants, Inc.
Data Validation Report**

Project/Site Name: Miller-Brooks/Runkle Canyon

Collection Date: March 27, 2006

LDC Report Date: May 3, 2006

Matrix: Water

Parameters: N-Nitrosodimethylamine

Validation Level: Level IV

Laboratory: Severn Trent Laboratories

Sample Delivery Group (SDG): G6C290294

Sample Identification

MW-2

MW-1

TRIP BLANK

Introduction

This data review covers 3 water samples listed on the cover sheet including dilutions and reanalysis as applicable. The analyses were per EPA Method 1625 modified for N-Nitrosodimethylamine.

This review follows a modified outline of the USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review (October 1999) as there are no current guidelines for the method stated above.

A qualification summary table is provided at the end of this report if data has been qualified. Flags are classified a P (protocol) or A (advisory) to indicate whether the flag is due to a laboratory deviation from a specified protocol or is of technical advisory nature.

Blank results are summarized in Section V.

Field duplicates are summarized in Section XVI.

The following are definitions of the data qualifiers:

- U Indicates the compound or analyte was analyzed for but not detected at or above the stated limit.
- J Indicates an estimated value.
- R Quality control indicates the data is not usable.
- N Presumptive evidence of presence of the constituent.
- UJ Indicates the compound or analyte was analyzed for but not detected. The sample detection limit is an estimated value.
- A Indicates the finding is based upon technical validation criteria.
- P Indicates the finding is related to a protocol/contractual deviation.
- None Indicates the data was not significantly impacted by the finding, therefore qualification was not required.

I. Technical Holding Times

All technical holding time requirements were met.

The chain-of-custodies were reviewed for documentation of cooler temperatures. All cooler temperatures met validation criteria.

II. HRGC/HRMS Instrument Performance Check

Instrument performance was checked at 12 hour intervals. The exact mass of 80.9952 of PFK was verified.

All ion abundance requirements were met.

III. Initial Calibration

Initial calibration was performed using required standard concentrations.

Percent relative standard deviations (%RSD) were less than or equal to 20.0% for each individual compound and less than or equal to 40.0% for labeled compounds.

IV. Continuing Calibration

Continuing calibration was performed at the required frequencies.

Percent differences (%D) between the initial calibration RRF and the continuing calibration RRF were within the method criteria of less than or equal to 20.0% for individual compounds and 50.0% for labeled compounds.

V. Blanks

Method blanks were reviewed for each matrix as applicable. No N-Nitrosodimethylamine was found in the method blanks.

Sample "TRIP BLANK" was identified as a trip blank. No N-Nitrosodimethylamine was found in this blank.

VI. Surrogate Spikes

Surrogates were not required by the method.

VII. Matrix Spike/Matrix Spike Duplicates

The laboratory has indicated that there were no matrix spike (MS) and matrix spike duplicate (MSD) analyses specified for the samples in this SDG, and therefore matrix spike and matrix spike duplicate analyses were not performed for this SDG.

VIII. Laboratory Control Samples (LCS)

Laboratory control samples were reviewed for each matrix as applicable. Percent recoveries (%R) and relative percent differences (RPD) were within QC limits.

IX. Regional Quality Assurance and Quality Control

Not applicable.

X. Internal Standards

All internal standard areas and retention times were within QC limits.

XI. Target Compound Identifications

All target compound identifications were within validation criteria.

XII. Compound Quantitation and CRQLs

All compound quantitation and CRQLs were within validation criteria.

XIII. Tentatively Identified Compounds (TICs)

Tentatively identified compounds were not required by the method.

XIV. System Performance

The system performance was acceptable.

XV. Overall Assessment

Data flags are summarized at the end of this report if data has been qualified.

XVI. Field Duplicates

No field duplicates were identified in this SDG.

**Miller-Brooks/Runkle Canyon
N-Nitrosodimethylamine - Data Qualification Summary - SDG G6C290294**

No Sample Data Qualified in this SDG

**Miller-Brooks/Runkle Canyon
N-Nitrosodimethylamine - Laboratory Blank Data Qualification Summary - SDG
G6C290294**

No Sample Data Qualified in this SDG

**Miller-Brooks/Runkle Canyon
N-Nitrosodimethylamine - Field Blank Data Qualification Summary - SDG
G6C290294**

No Sample Data Qualified in this SDG

Miller Brooks Environmental Inc

Client Sample ID: MW-1

Trace Level Organic Compounds

Lot-Sample #....: G6C290294-002 Work Order #....: H17H91AD Matrix.....: WATER
Date Sampled....: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/31/06 Analysis Date...: 04/06/06
Prep Batch #....: 6090294
Dilution Factor: 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>
N-Nitrosodimethylamine	ND	2.0	ng/L	CFR136A 1625 Modi

<u>INTERNAL STANDARDS</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>
N-Nitrosodimethylamine-d6	43	(25 - 150)

Miller Brooks Environmental Inc

Client Sample ID: TRIP BLANK

Trace Level Organic Compounds

Lot-Sample #....: G6C290294-004 Work Order #....: H17JD1AD Matrix.....: WATER
Date Sampled....: 03/27/06 Date Received...: 03/29/06
Prep Date.....: 03/31/06 Analysis Date...: 04/06/06
Prep Batch #....: 6090294
Dilution Factor: 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>DETECTION LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>
N-Nitrosodimethylamine	ND	2.0	ng/L	CFR136A 1625 Modi

<u>INTERNAL STANDARDS</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>
N-Nitrosodimethylamine-d6	42	(25 - 150)

4/9/06

METHOD: GC/MS N-Nitrosodimethylamine (EPA Method 1625) *Met*

The samples listed below were reviewed for each of the following validation areas. Validation findings are noted in attached validation findings worksheets.

	Validation Area		Comments
I.	Technical holding times	A	Sampling dates: <u>3/27/06</u>
II.	<i>HW</i> GC/MS Instrument performance check	A	
III.	Initial calibration	A	$\%RSD \leq 20/40$ (NDMA/Labelled)
IV.	Continuing calibration	A	$\%D \leq 20/50$ ↓
V.	Blanks	A	
VI.	Surrogate spikes	N	<i>not req'd</i>
VII.	Matrix spike/Matrix spike duplicates	N	
VIII.	Laboratory control samples	A	<i>LCS/D</i>
IX.	Regional Quality Assurance and Quality Control	N	
X.	Internal standards	A	
XI.	Target compound identification	A	
XII.	Compound quantitation/CRQLs	A	
XIII.	Tentatively identified compounds (TICs)	N	
XIV.	System performance	A	
XV.	Overall assessment of data	A	
XVI.	Field duplicates	N	
XVII.	Field blanks	<i>ND</i>	<i>TB=3</i>

Note: A = Acceptable ND = No compounds detected D = Duplicate
 N = Not provided/applicable R = Rinsate TB = Trip blank
 SW = See worksheet FB = Field blank EB = Equipment blank

Validated Samples: *all H2O's*

1	MW-2	11	<i>6090294 MB</i>	21		31	
2	MW-1	12		22		32	
3	TRIP BLANK	13		23		33	
4		14		24		34	
5		15		25		35	
6		16		26		36	
7		17		27		37	
8		18		28		38	
9		19		29		39	
10		20		30		40	

LDC #: 14864A2
 SDG #: 06290294

VALIDATION FINDINGS CHECKLIST

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Method: ^{NDMA} Semivolatiles (EPA SW 846 Method 8270C) 1625 ml

Validation Area	Yes	No	NA	Findings/Comments
I. Technical holding times				
All technical holding times were met.	/			
Cooler temperature criteria was met.	/			
II. GC/MS instrument performance check				
Were the ^{inst} DFRP performance results reviewed and found to be within the specified criteria? PFIC @ 80.9952	/			
Were all samples analyzed within the 12 hour clock criteria?	/			
III. Initial calibration				
Did the laboratory perform a 5 point calibration prior to sample analysis?	/			
Were all percent relative standard deviations (%RSD) and relative response factors (RRF) within method criteria for all CCCs and SPCCs?				
Was a curve fit used for evaluation?				
Did the initial calibration meet the curve fit acceptance criteria of > 0.990?				
Were all percent relative standard deviations (%RSD) ≤ 30% and relative response factors (RRF) ≥ 0.05?				
IV. Continuing calibration				
Was a continuing calibration standard analyzed at least once every 12 hours for each instrument?				
Were all percent differences (%D) and relative response factors (RRF) within method criteria for all CCCs and SPCCs?				
Were all percent differences (%D) ≤ 25% and relative response factors (RRF) ≥ 0.05?				
V. Blanks				
Was a method blank associated with every sample in this SDG?	/			
Was a method blank analyzed for each matrix and concentration?	/			
Was there contamination in the method blanks? If yes, please see the Blanks validation completeness worksheet.		/		
VI. Surrogate spikes				
Were all surrogate %R within QC limits?		/		
If 2 or more base neutral or acid surrogates were outside QC limits, was a reanalysis performed to confirm %R?		/		
If any %R was less than 10 percent, was a reanalysis performed to confirm %R?			/	
VII. Matrix spike/Matrix spike duplicates				
Were a matrix spike (MS) and matrix spike duplicate (MSD) analyzed for each matrix in this SDG? If no, indicate which matrix does not have an associated MS/MSD. Soil / Water.		/		
Was a MS/MSD analyzed every 20 samples of each matrix?		/		
Were the MS/MSD percent recoveries (%R) and the relative percent differences (RPD) within the QC limits?			/	
VIII. Laboratory control samples				
Was an LCS analyzed for this SDG?	/			

LDC #: 14864A2
 SDG #: G60290294

VALIDATION FINDINGS CHECKLIST

Page: 2 of 2
 Reviewer: _____
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Validation Area	Yes	No	NA	Findings/Comments
Was an LCS analyzed per extraction batch?	<input checked="" type="checkbox"/>			
Were the LCS percent recoveries (%R) and relative percent difference (RPD) within the QC limits?	<input checked="" type="checkbox"/>			
IX. Regional Quality Assurance and Quality Control				
Were performance evaluation (PE) samples performed?			<input checked="" type="checkbox"/>	
Were the performance evaluation (PE) samples within the acceptance limits?			<input checked="" type="checkbox"/>	
X. Internal standards				
Were internal standard area counts within ^{0.12} 50% or ²⁵⁻¹⁵⁰ +100% of the associated calibration standard?	<input checked="" type="checkbox"/>			
Were retention times within + 30 seconds from the associated calibration standard?			<input checked="" type="checkbox"/>	
XI. Target compound identification				
Were relative retention times (RRT's) within + 0.06 RRT units of the standard?			<input checked="" type="checkbox"/>	
Did compound spectra meet specified EPA "Functional Guidelines" criteria?			<input checked="" type="checkbox"/>	
Were chromatogram peaks verified and accounted for?	<input checked="" type="checkbox"/>			
XII. Compound quantitation/CRQLs				
Were the correct internal standard (IS), quantitation ion and relative response factor (RRF) used to quantitate the compound?	<input checked="" type="checkbox"/>			
Were compound quantitation and CRQLs adjusted to reflect all sample dilutions and dry weight factors applicable to level IV validation?	<input checked="" type="checkbox"/>			
XIII. Tentatively identified compounds (TICs)				
Were the major ions (> 10 percent relative intensity) in the reference spectrum evaluated in sample spectrum?			<input checked="" type="checkbox"/>	
Were relative intensities of the major ions within $\pm 20\%$ between the sample and the reference spectra?			<input checked="" type="checkbox"/>	
Did the raw data indicate that the laboratory performed a library search for all required peaks in the chromatograms (samples and blanks)?			<input checked="" type="checkbox"/>	
XIV. System performance				
System performance was found to be acceptable.	<input checked="" type="checkbox"/>			
XV. Overall assessment of data				
Overall assessment of data was found to be acceptable.	<input checked="" type="checkbox"/>			
XVI. Field duplicates				
Field duplicate pairs were identified in this SDG.			<input checked="" type="checkbox"/>	
Target compounds were detected in the field duplicates.			<input checked="" type="checkbox"/>	
XVII. Field blanks				
Field blanks were identified in this SDG.			<input checked="" type="checkbox"/>	
Target compounds were detected in the field blanks.			<input checked="" type="checkbox"/>	

Initial Calibration Calculation Verification

Lab #: 1100/A2
 SDG #: 660270294

METHOD: GC/MS ^{NAMA} BVA (EPA SW 846 Method 8270) ^{163M}

The Relative Response Factor (RRF), average RRF, and percent relative standard deviation (%RSD) were recalculated for the compounds identified below using the following calculations:

$RRF = (A_s)(C_u)/(A_u)(C_s)$ A_u = Area of compound, A_s = Area of associated internal standard
 average RRF = sum of the RRFs/number of standards C_u = Concentration of compound, C_s = Concentration of internal standard
 $\%RSD = 100 * (S/X)$ S = Standard deviation of the RRFs, X = Mean of the RRFs

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Reported		Recalculated		Reported		Recalculated	
				RRF (CS ₂ std)	RRF (CS ₂ std)	Average RRF (Initial)	Average RRF (Initial)	%RSD	%RSD		
1	ICAL	4/4/04	Phenol (1st internal standard) DDD	1.026	1.026	1.000	1.000	2.519	2.519	2.519	2.519
			Naphthalene (2nd internal standard)								
			Fluorene (3rd internal standard)								
			Pentachlorophenol (4th internal standard)								
			Bis(2-ethylhexyl)phthalate (5th internal standard)								
			Benzo(a)pyrene (6th internal standard)								
2			Phenol (1st internal standard)								
			Naphthalene (2nd internal standard)								
			Fluorene (3rd internal standard)								
			Pentachlorophenol (4th internal standard)								
			Bis(2-ethylhexyl)phthalate (5th internal standard)								
			Benzo(a)pyrene (6th internal standard)								
3			Phenol (1st internal standard)								
			Naphthalene (2nd internal standard)								
			Fluorene (3rd internal standard)								
			Pentachlorophenol (4th internal standard)								
			Bis(2-ethylhexyl)phthalate (5th internal standard)								
			Benzo(a)pyrene (6th internal standard)								

Comments: Refer to Initial Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 14861A2
 SDG #: GEC290294

VALIDATION FINDINGS WORKSHEET
Continuing Calibration Results Verification

Page: 1 of 1
 Reviewer: [Signature]
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METHOD: GC/MS BNA (EPA SW 846 Method 8270)

The percent difference (%D) of the initial calibration average Relative Response Factors (RRFs) and the continuing calibration RRFs were recalculated for the compounds identified below using the following calculation:

% Difference = $100 * (\text{ave. RRF} - \text{RRF}) / \text{ave. RRF}$ Where: ave. RRF = initial calibration average RRF
 RRF = $(A_x)(C_x) / (A_s)(C_s)$ RRF = continuing calibration RRF
 A_x = Area of compound, A_s = Area of associated internal standard
 C_x = Concentration of compound, C_s = Concentration of internal standard

#	Standard ID	Calibration Date	Compound (Reference Internal Standard)	Average RRF (Initial)	Reported		Recalculated	
					RRF (CC)	%D	RRF (CC)	%D
1	C53	4/6/06	Phenol (1st internal standard) Naphthalene (2nd internal standard) Fluorene (3rd internal standard) Pentachlorophenol (4th internal standard) Bis(2-ethylhexyl)phthalate (5th internal standard) Benzo(a)pyrene (6th internal standard)	1.000	0.996	0.4	0.996	0.4
2			Phenol (1st internal standard) Naphthalene (2nd internal standard) Fluorene (3rd internal standard) Pentachlorophenol (4th internal standard) Bis(2-ethylhexyl)phthalate (5th internal standard) Benzo(a)pyrene (6th internal standard)					
3			Phenol (1st internal standard) Naphthalene (2nd internal standard) Fluorene (3rd internal standard) Pentachlorophenol (4th internal standard) Bis(2-ethylhexyl)phthalate (5th internal standard) Benzo(a)pyrene (6th internal standard)					

Comments: Refer to Continuing Calibration findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

LDC #: 14864A2
 SDG #: 160290294

VALIDATION FINDINGS WORKSHEET
Laboratory Control Sample/Laboratory Control Sample Duplicates Results Verification

Page: 1 of 1
 Reviewer: [Signature]
 2nd Reviewer: [Signature]

METHOD: GC/MS BNA (EPA SW 846 Method 8270)

The percent recoveries (%R) and Relative Percent Difference (RPD) of the laboratory control sample and laboratory control sample duplicate were recalculated for the compounds identified below using the following calculation:

% Recovery = $100 * (SC/SA)$ Where: SSC = Spike concentration
 SA = Spike added

RPD = $100 * (LCS - LCSD) / (LCS + LCSD)$ LCS = Laboratory control sample percent recovery LCSD = Laboratory control sample duplicate percent recovery

LCS/LCSD samples: LCS/D

Compound	Spike Added (ng/L)		Spike Concentration (ng/L)		LCS		LCSD		LCS/LCSD	
	LCS	LCSD	LCS	LCSD	Percent Recovery	Recalc.	Percent Recovery	Recalc.	Reported	Recalculated
Phenol	100	100	108	106	108	108	106	106	1.4	1.9
NDMA										
2-Chlorophenol										
1,4-Dichlorobenzene										
N-Nitroso-di-n-propylamine										
1,2,4-Trichlorobenzene										
4-Chloro-3-methylphenol										
Acenaphthene										
4-Nitrophenol										
2,4-Dinitrotoluene										
Pentachlorophenol										
Pyrene										

Comments: Refer to Laboratory Control Sample/Laboratory Control Sample Duplicates findings worksheet for list of qualifications and associated samples when reported results do not agree within 10.0% of the recalculated results.

