Erler &
Kalinowski,
Inc.

ADDITIONAL TECHNICAL INFORMATION

Hollywood Park Racetrack and Casino
1050 South Prairie Avenue
Inglewood, California

3 October 2008

Prepared for:

Hollywood Park Land Company, LLC

(EKI A50015.01)

Consulting engineers and scientists

Erler & Kalinowski, Inc.
Consulting Engineers and Scientists
35 North Lake Avenue, Suite 705
Pasadena, CA 91101-1856
(626) 432-5900
Fax (626) 432-5905

3 October 2008

Mr. Gregg Crandall
State of California Regional Water Quality
Control Board, Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Additional Technical Information
Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue,
Inglewood, California, SLIC Number 1207
(EKI A50015.01)

Dear Mr. Crandall:

Erler & Kalinowski, Inc. ("EKI") is pleased to submit this report of *Additional Technical Information* to the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB"), on behalf of Hollywood Park Land Company, LLC ("HPLC"), for the Hollywood Park Racetrack and Casino property located at 1050 South Prairie Avenue in Inglewood, California (the "Property"). The enclosed report was prepared to summarize additional technical information presented by EKI on behalf of HPLC during a meeting with you, Ms. Su Han, and Dr. Arthur Heath on 11 September 2008, and includes technical information in response to the California Water Code Section 13627 letter issued by the RWQCB, dated 22 August 2008.

HPLC requests that you review this additional technical information and contact me to arrange a meeting with HPLC representatives for purposes of reaching agreement regarding the additional work requested in the three RWQCB comment letters issued on 13, 20, and 22 August 2008. If agreement regarding these issues is not reached between RWQCB staff and HPLC representatives by 11 November 2008, then HPLC will request an additional 60-day extension of the dates noted in the 17 September 2008 letter.

We appreciate the efforts of RWQCB staff to review the additional information presented during the 11 September 2008 meeting and herein, and we look forward to resolving these issues and moving forward with the project.

If you have any questions, please contact me at (626) 432-5900, extension 201.

Very truly yours,

ERLER & KALINOWSKI, INC.

Jami Striegel Orloff

Jami A. Striegel Orloff, P.E.
Project Manager

REGISTERED PROFESSIONAL ENGINEER
JAMI A STRIEGEL ORLOFF
exp
C65723
6/30/10
CIVIL
STATE OF CALIFORNIA

cc: Mr. Douglas M. Moreland (HPLC, c/o Wilson Meany Sullivan, LP)
Mr. Patrick Dennis, Esq. (Gibson, Dunn & Crutcher, LLP)

Enclosure

ADDITIONAL TECHNICAL INFORMATION

Hollywood Park Racetrack and Casino
1050 South Prairie Avenue, Inglewood, California

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1. INTRODUCTION

Erler & Kalinowski, Inc. ("EKI") is pleased to submit this additional technical information to the California Regional Water Quality Control Board, Los Angeles Region ("RWQCB"), on behalf of Hollywood Park Land Company, LLC ("HPLC"), for the Hollywood Park Racetrack and Casino property located at 1050 South Prairie Avenue in Inglewood, California (the "Property"), as shown on Figure 1. This report was prepared to summarize additional technical information presented by EKI on behalf of HPLC during a meeting with Mr. Gregg Crandall, Ms. Su Han, and Dr. Arthur Heath on 11 September 2008, in response to the California Water Code Section 13627 letter issued by the RWQCB, dated 22 August 2008.

1.1 Background

Following its purchase of the Property in September 2005, HPLC has continued the commercial horse racing facility and casino operations on the Property. In July 2006, HPLC began working with the RWQCB to review the environmental conditions at the Property 1) for its continued use as a commercial horse racing facility and casino, and 2) to develop a strategy for addressing environmental concerns during potential future redevelopment of the Property. In July 2006, HPLC and RWQCB staff agreed to implement a voluntary "two track" process for the Property. First, RWQCB staff would review and address certain environmental conditions on the Property consistent with continuation of the horse racing and casino commercial operations, i.e., "Track 1", and, second, if future redevelopment of the Property were to proceed, to review and address environmental conditions during the overall redevelopment process in the context of the planned future land uses, i.e., "Track 2".

On behalf of HPLC, and for purposes of continued commercial operations on Track 1, EKI submitted to the RWQCB the results of the screening-level subsurface environmental investigations, conducted by EKI and others during 2005 and 2006, in a data summary report prepared by EKI, dated 30 October 2006 (EKI, 2006; the "Data Summary Report"). The Data Summary Report included a work plan for implementation of soil vapor extraction ("SVE") in one focused area of the Property where dry cleaning operations were conducted by a previous owner of the Property. The RWQCB issued a letter on 8 May 2007, approving SVE remediation of this area (RWQCB, 2007a). HPLC subsequently installed an SVE system in this area that is currently operating, and SVE rebound testing is scheduled to begin after 30 September 2008 in accordance with the *Work Plan for SVE Rebound Testing and Confirmation Soil Sampling,* prepared by EKI, dated 9 July 2008 (EKI, 2008b; the "SVE Rebound Work Plan"), that was conditionally approved by the RWQCB in a letter dated 20 August 2008 (RWQCB, 2008b).

On behalf of HPLC, as part of planning and in preparation for potential future redevelopment of the Property, i.e., Track 2, EKI prepared a *Soil Management Plan* (EKI, 2007; the "Soil Management Plan") to summarize the strategy developed by HPLC and the Regional Board to provide an environmental risk management framework that will be implemented during the redevelopment process. This framework is intended to

provide orderly and timely management of residual chemicals of potential concern in soil previously identified in certain areas, or possibly encountered on the property in a manner that is consistent with the planned land uses and that is protective of human health and the environment, including water quality. The Soil Management Plan was conditionally approved by the RWQCB in a letter dated December 24, 2007 (RWQCB, 2007b; the "December 2007 RWQCB letter"). At that time, the Regional Board requested additional information regarding certain conditions on the property. HPLC provided the additional requested information in the *Technical Report and Work Plan* prepared by EKI, dated 23 April 2008 (EKI, 2008a; the "Technical Report and Work Plan").

The Technical Report and Work Plan proposed collection of sixteen shallow soil samples, installation of four groundwater monitoring wells, and groundwater sampling on the Property in response to the December 2007 RWQCB letter. The proposed sampling locations are shown on Figure 2. The RWQCB has approved HPLC's work plan for collection of these samples, as discussed below. HPLC is currently making preparations to conduct this approved sampling, and the groundwater monitoring well locations have been shifted slightly from the prior mapped locations shown in the Technical Report and Work Plan to accommodate access and land planning constraints. Figure 2 reflects the updated proposed monitoring well locations.

1.2 RWQCB Comment Letters

HPLC received three comment letters from the RWQCB during August 2008 that approved the SVE Rebound Work Plan, provided comments regarding the Technical Report and Work Plan as a follow up to the December 2007 RWQCB letter, and approved the soil and groundwater sampling and monitoring well installation proposed in the Technical Report and Work Plan, as follows:

- Conditional Approval of Work Plan for Installation of Groundwater Monitoring Wells and Proposed Soil Sampling, dated 13 August 2008 (RWQCB, 2008a);
- Conditional Approval of Work Plan for SVE Rebound Testing and Confirmation Soil Sampling in the Former Dry Cleaning Area, dated 20 August 2008 (RWQCB, 2008b); and
- Comments on Technical Report and Work Plan, dated 22 August 2008 (RWQCB, 2008c). [1]

Representatives of HPLC and the RWQCB met on 11 September 2008 to discuss these three RWQCB comment letters, and EKI presented additional technical information and summarized HPLC's opinions regarding the RWQCB's comments. During the meeting, it was agreed that additional time would be needed for the RWQCB and HPLC to

[1] The 22 August 2008 letter was issued pursuant to California Water Code Section 13627. HPLC filed a petition with the State Water Resources Control Board on 22 September 2008 to preserve its rights under California Water Code Section 13627 (GDC, 2008) with the understanding that representatives of the RWQCB and HPLC are continuing to work toward agreement regarding the comments presented in the three RWQCB letters received by HPLC during August 2008.

consider the additional information. To facilitate this additional discussion period with RWQCB staff, HPLC requested a 60-day extension of the deadlines contained in the 22 August 2008 RWQCB letter (HPLC, 2008), which was granted by the RWQCB (RWQCB, 2008d).

As requested by Mr. Gregg Crandall, Ms. Su Han, and Dr. Arthur Heath at the conclusion of the 11 September meeting, EKI has prepared this report on behalf of HPLC to transmit the additional technical information presented during that meeting for your further review and consideration. For example, during the 11 September 2008 meeting, HPLC and EKI presented information to clarify that for Track 2, extensive geotechnical overexcavation will occur on much of the Property, including the Main Track infield, and these soils will be managed in accordance with the approved Soil Management Plan. HPLC's current geotechnical overexcavation plan is provided as an attachment to this document, as discussed in Section 2.4.1. The information presented herein is, therefore, supplementary to the Technical Report and Work Plan.

2. ADDITIONAL TECHNICAL INFORMATION

The additional technical information presented herein is organized as follows:

- Regional and Local Nitrate Issues in Shallow Groundwater
- Additional Groundwater Monitoring Wells
- Additional Soil Sampling
- Additional Soil Gas Sampling
- Former Dry Cleaning Area

EKI's opinions and conclusions regarding each of these topics, in response to the RWQCB comment letters, are presented within each relevant section below.

2.1 Regional and Local Nitrate Issues in Shallow Groundwater

The Technical Report and Work Plan provides information regarding known regional and local groundwater quality issues in the West Coast Basin, particularly within the City of Inglewood.

Nitrate is a well-documented and pervasive regional issue that has been studied over the past several decades by agencies including the SWRCB, the California Department of Food and Agriculture ("CDFA"), and the Water Replenishment District of Southern California ("WRDSC"). The CDFA Nitrate Working Group states (CDFA, 1989):

> *"Nitrate is very persistent and it is difficult to determine if the nitrate is from current or past operations or from natural or man-made sources in the area. It is difficult to quantify the level of nitrate contribution from a single source because there may be a myriad of potential sources or contributions above an aquifer."*

Figures published in 1989 by CDFA, adapted from an earlier SWRCB document (SWRCB, 1988), show that nitrate is present in groundwater throughout California, and there are numerous locations in the Los Angeles area that were found to contain nitrate above the California maximum contaminant level ("MCL") of 10 milligrams per liter ("mg/L"), for nitrate as nitrogen (CDFA, 1989). Copies of these CDFA figures are provided in Appendix A. Attached Figure 2 clearly indicates a regional nitrate issue in groundwater within the West Coast Basin in the greater Los Angeles area.

Nitrates are a known local groundwater quality issue in the City of Inglewood Area within the West Coast Basin. The WRDSC is monitoring nitrate concentrations in groundwater within the City of Inglewood as part of its basin monitoring program, and WRDSC states the following (WRDSC, 2006):

"As in the Central Basin, shallow zone occurrences of nitrate with deeper zones below detection limits may be attributable to local surface recharge from former agricultural activities prior to the extensive land development that began in the 1950s."

Data available from the Regional Groundwater Monitoring Report for Water Year 2005-2006 published by WRDSC (WRDSC, 2007) and the available data from the WRDSC interactive well search (WRDSC, 2008) for this time period confirm that detectable concentrations of nitrate are limited to shallow groundwater in the City of Inglewood area. A nested WRDSC monitoring well identified as 'Inglewood 1' is located approximately 6,100 feet northwest of the Property, as shown on the attached Figure 1. Nitrate concentrations measured in the groundwater samples from well Inglewood 1 within the first-encountered, shallow groundwater zone, i.e. the Gage Aquifer, have ranged from 7.2 to 10.6 mg/L since 2000 (WRDSC, 2008). Excerpts of this information published by WRDSC are provided in Appendix A. By comparison, results of nitrate as nitrogen analyses for grab groundwater samples collected on the eastern portion of the Property range from below the detection limit of 0.1 milligrams per liter ("mg/L") to 1.6 mg/L, and from 10 mg/L to 17 mg/L for grab groundwater samples collected on the western portion of the Property. The highest detected concentrations of nitrate were found in grab groundwater samples collected along the western Property boundary and may be migrating onto the Property from off-site sources, as discussed in the Technical Report and Work Plan and in Section 2.1.4 below.

The City of Inglewood pumps approximately 45 percent of the municipal water it supplies from the local groundwater basin, from the deeper Silverado Aquifer, which is present at approximately 450 feet below the ground surface at the Inglewood 1 well location (Inglewood, 2005; Inglewood, 2008b). Nitrate was not detected in groundwater samples collected within the Silverado aquifer in the vicinity of the Property during 2008 (WRDSC, 2008), and nitrate was not detected in the water supplied by the City of Inglewood to its service area in 2008 (Inglewood, 2008a). See Appendix A for these data.

2.1.1 Historical Agricultural Sources of Nitrate in Groundwater

The land that was incorporated as the City of Inglewood in 1908 was used for agriculture, including cattle and sheep ranching, poultry and chinchilla farming, row crop production, vineyards, and fruit orchards from the late 1700s through the beginning of World War II, as follows (Kielbasa, 1997; Inglewood, 2008c):

- Late 1700s to 1820s – Public pasture land for cattle;
- 1820s to 1860s – Cattle ranching and corn and vineyard cultivation, with several thousand head of cattle and over 7,000 vines per harvest;
- 1860s to 1875 – Sheep ranching of over 24,000 head of sheep, vegetable and vineyard cultivation;
- 1875 to 1876 – Drought occurred and approximately 22,000 head of sheep died;

- 1876 to 1887 – Horse ranching and cultivation of wheat, barley, and orchards with thousands of various fruit trees; by 1880, one million bushels of grain were exported annually and over 22,000 acres were under cultivation;
- 1887 and 1888 – Centinela-Inglewood Land Company divided the land into residential lots, farmland, and fine orchard property;
- 1905 – Poultry farming in northern Inglewood;
- 1908 – City of Inglewood was incorporated, then between 1920 and 1925 Inglewood was the fastest growing city in the United States;
- 1923 – Chinchilla farming in Inglewood;
- Between 1930 and 1938 – Hollywood Park racetrack was constructed; and
- Until World War II – Inglewood was the hub of an agricultural area, including the Inglewood High School Farm located at Kelso and Inglewood Avenue, northwest of the Property.

An aerial photograph provided in Appendix A shows the general agricultural land use in a portion of the City of Inglewood during 1928.

2.1.2 Historical Non-Agricultural Potential Sources of Nitrate in Groundwater

As noted by the CDFA, the World Health Organization, and others, nitrate in groundwater comes from many different sources, many of which would currently and historically be found in a typical industrial city such as Inglewood (CDFA, 1989; WHO, 2004):

- Inorganic fertilizers not specifically associated with agriculture
- Sewer leakage and septic systems
- Municipal waste treatment facilities
- Historical, undocumented landfills
- Certain industrial operations:
  - Production of explosives and rocket propellants
  - Food preservatives, e.g. cured meats
  - Glass-making operations

Some examples of these non-agricultural potential sources of nitrate are facilities with reported use of nitrogen and nitrate compounds in Los Angeles County and the City of Inglewood area that were identified using the United States Environmental Protection Agency ("U.S. EPA") Toxic Release Inventory ("TRI"). Figures showing the locations of these facilities within the Inglewood area are provided in Appendix A.

Some examples of non-agricultural potential sources of nitrate in groundwater within the City of Inglewood are as follows:

- Historical wastewater management practices prior to construction of public sewers, which occurred in approximately 1923, according to the Sanitary Districts of Los Angeles County ("SDLAC"). As published by the SDLAC, "wastewater was collected in buckets and put into agricultural fields or into rivers and streams" (SDLAC, 2008).
- Public sewers within the city boundaries, which are shown on the City of Inglewood Sewer Index provided in Appendix A.
- Historical and ongoing fertilizer application occurring within the densely developed commercial and residential properties.
- Rocket propellant manufacturing or usage, such as was likely associated with the National Space and Missile Systems program undertaken at Manchester and Locust in 1954 for development of first intercontinental ballistic missile (Inglewood, 2008c). The location of this former missile manufacturer is shown on a figure provided in Appendix A.

2.1.3 Summary of RWQCB Storm Water Permits for the Property

RWQCB staff review management of dry and wet weather flows on the Property, for example, including "process wastewater" from the horse stable areas, and has issued associated permits. The Property currently operates under a National Pollutant Discharge Elimination System ("NPDES") permit, under which dry and wet weather flows are managed, as follows:

- Prior NPDES Permit No. CA0064211, Order No. 99-105 was issued on 20 October 1999 and expired on 10 September 2004; under this prior permit, dry and wet weather flows from the Property were discharged to storm drains.
- The RWQCB adopted a Cease and Desist Order No. 99-106 on 28 October 1999 for prohibition of dry weather discharges of process wastewater and a reduction of wet weather discharges to storm drains.
- Modifications to the storm water system, including construction of an on-site treatment facility, were made over a period of several years, at significant expense, with RWQCB staff oversight.
- Churchill Downs (prior owner of the Property) applied for renewal of the NPDES permit on 10 March 2004.
- HPLC purchased the Property on 23 September 2005.
- The RWQCB issued a renewed NPDES permit No. CA0064211, CI-8100, Order No. R4-2006-0062, adopted 13 July 2006, and rescinded the Cease and Desist Order because the requirements of that Order were met.

Changes to the storm water conveyance and management systems on the Property were implemented to meet the RWQCB requirements, including the following:

- Dry weather flows to storm drains from grandstand area, paddock and stable areas, and sidewalks have been eliminated.
- The first 0.1 inch of storm water from the stable area is not discharged to the storm drain.
- Wet weather discharges to storm drains from horse wash areas have been eliminated.
- A Manure Management Plan has been implemented that includes measures to prevent storm water from contacting stored manure or manure-soiled bedding.
- A weekly maintenance and inspection program for drains discharging horse wash water and water from the stable area has been implemented.

New and revised best management practices ("BMPs") for management of dry and wet weather flows have been implemented at the Property, including:

- Modifications to north pond, which is located in the northern portion of the infield of the Main Track, included draining and re-grading of the pond area, berming the edges of the pond, and constructing a liner system consisting of approximately 153,000 square feet of geosynthetic clay liner, a PVC liner, and a minimum of one foot of soil cover. According to the renewed NPDES permit, prior to these modifications the North Pond "was not useful for wastewater or storm water containment". (RWQCB, 2006).
- Re-piping of stable area storm drains, horse washdown pads, and rain gutters from stable area barns for conveyance to the on-site treatment facility.
- Installation of a California Title 22 wastewater treatment facility, for treatment of water on the Property. Treated water is now stored in the reconstructed north pond, then used for irrigation on the Property.
- Implementation of a Manure Management Plan, including installation of approximately 10 miles of pipeline to divert runoff to the on-site treatment facility and requiring that waste bedding material is transported off-site daily for composting.

Photographs of the reconstruction and lining of the north pond are provided in Appendix A. As the photos show, a significant portion of the northern Main Track infield is covered with the north pond liner system.

Thus, there are no known releases of nitrogen compounds occurring to groundwater on the Property related to its racetrack operations.

2.1.4 Conclusions Regarding Nitrate in Groundwater at the Property

EKI's opinions regarding the RWQCB comments on nitrate in first encountered groundwater below the Property are as follows:

- Nitrate is a known regional and local groundwater quality issue, one which is currently being monitored by WRDSC, unrelated to the Property. Countless historical and current potential sources of nitrate to shallow groundwater exist in and near the City of Inglewood. The nitrate impact is limited to first-encountered shallow groundwater (WRDSC, 2007), and nitrate is not impacting the deeper aquifer zones that are currently being used for drinking water supply in the City of Inglewood (Inglewood, 2008a).
- The use of the following language in the 13 August 2008 RWQCB letter regarding the groundwater conditions on the Property is inaccurate and speculative:
  - Comment 2 referencing "elevated levels of nitrogen compounds in groundwater present throughout the Property", and
  - Comment 12 referencing "plumes originating from the Property".
- There are no nitrate "plumes" originating from the Property. Nitrate concentrations measured in groundwater samples on the Property were largely below the MCL of 10 mg/L as nitrogen, except at the far western boundary of the Property that is inferred to be generally upgradient, as seen on Figure 2, which also provides these nitrate concentrations (EKI, 2006 and EKI, 2008a).
- A few grab groundwater samples taken on the western Property boundary were only slightly above the MCL and not inconsistent with the known regional nitrate problem in shallow groundwater, which is being monitored by the WRDSC and others as noted above.
- The highest concentration of nitrate (17 mg/L of nitrate as nitrogen) was detected in the grab groundwater sample collected from the southwestern corner of the Property, as shown on Figure 2. This sample also contained total petroleum hydrocarbons ("TPH") that are believed to be migrating onto the Property from the former Unocal #5050 station located across the street from the Property to the southwest, which was closed by the RWQCB in October 1996. Several hundred micrograms per liter ("µg/L") TPH remained in groundwater at the Unocal station at that time, as discussed in the Technical Report and Work Plan. In its 22 August 2008 letter, the RWQCB agreed that the TPH-impacted groundwater on the southwestern portion of the Property appears to be migrating onto the Property from the Unocal #5050 station area. Therefore, the nitrate found in this same grab groundwater sample is also believed to reflect the quality of groundwater migrating onto the Property in this area.
- Additional investigation of the occurrence of nitrate in groundwater on the Property at locations other than the proposed four new monitoring well locations, as discussed below, is unwarranted (EKI, 2008a). In light of the available

information that indicates nitrate concentrations detected in grab groundwater samples on the Property are consistent with concentrations of nitrate detected in shallow groundwater samples collected by WRDSC from the off-site well Inglewood 1, and that groundwater appears to be flowing onto the Property generally from the west, e.g., at the location where the highest nitrate concentration was detected in grab groundwater samples on the Property, it cannot be concluded that there are nitrate "plumes" originating on the Property or that there are "elevated" concentrations "throughout" the Property.

2.2 Additional Groundwater Monitoring Wells

In its 13 August 2008 letter, which is referenced in Comment #2 of the 22 August 2008 letter, the RWQCB requested installation of four groundwater monitoring wells in addition to the four monitoring wells originally proposed by HPLC in the Technical Report and Work Plan, which were approved by the RWQCB. As described in the Technical Report and Work Plan, monitoring wells in these locations must be drilled to approximately 140 feet below ground surface and will be expensive to construct and develop.

The RWQCB presented the following rationale in its 13 August 2008 letter for requesting these four additional wells:

- One added monitoring well near prior sampling location PS-GW-1, to assess the vertical and lateral extents of tetrachloroethene ("PCE") in the Former Dry Cleaning Area;
- One added monitoring well near prior sampling location PS-GW-6, to investigate potential "source areas" and verify the presence of nitrate and TPH in a previous grab groundwater sample; and
- Two added monitoring wells within the southern and the northern sections of the Main Track infield, to define "elevated levels" of nitrate and to determine if the infield is a possible contributing source of nitrate to groundwater.

Each of these requested four, additional monitoring well locations is discussed below.

2.2.1 Additional Monitoring Well Requested Near the Prior PS-GW-1 Borehole Location

EKI's opinions regarding the RWQCB's request for an additional groundwater monitoring well to be installed near the prior PS-GW-1 borehole location are as follows:

- Ongoing SVE remediation is in progress in the Former Dry Cleaning Area as previously approved by the RWQCB, in a letter dated 8 May 2007 (RWQCB, 2007a).

- Access constraints limit available drilling locations to a small area outside the Grandstand Building at the approximate location of prior grab groundwater borehole PS-GW-1, from which a grab groundwater sample was previously collected. Installing a monitoring well at this location would not be expected to provide a significant amount of new data at this time.
- The timing for installation of a groundwater monitoring well at the Former Dry Cleaning Area, as well as the physical access limitations imposed by existing structures including the 1,500 foot long multistory Grandstand Building, were previously discussed with RWQCB staff. HPLC and RWQCB representatives agreed previously that monitoring wells would not be installed in the Former Dry Cleaning Area until after completion of SVE and after existing buildings are demolished; this discussion is documented in the 8 May 2007 RWQCB letter (RWQCB, 2007a).
- Inasmuch as HPLC has agreed to implement necessary further investigations for closure of the Former Dry Cleaning Area following completion of SVE operations and demolition of the Grandstand Building, there is no clear reason to immediately install a monitoring well in a non-optimal location and one that will be destroyed during planned building demolition and grading operations.

2.2.2 Additional Monitoring Well Requested Near the Prior PS-GW-6 Borehole Location

EKI's opinions regarding the RWQCB's request for an additional groundwater monitoring well to be installed near the prior PS-GW-6 borehole location are as follows:

- There are no known past or current significant uses of this area, and no known "potential source areas" of nitrates or TPH at this location. This area is a paved area adjacent to the Grandstand Building.
- Prior borehole PS-GW-6 was drilled in an identified accessible drilling location as part of the prior investigations of the Former Dry Cleaning Area. Grab groundwater data for borehole PS-GW-6 were collected and analyzed for TPH, volatile organic compounds ("VOCs"), fuel oxygenates, metals, nitrite, nitrate, and perchlorate (EKI, 2006).
- VOCs and fuel oxygenates were not detected in the grab groundwater sample collected from borehole PS-GW-6.
- Nitrate detected in the grab groundwater sample collected from borehole PS-GW-6 was measured at 10 mg/L as N, which is equivalent to the California MCL, and not inconsistent with other off-site nitrate data within the City of Inglewood as discussed above.
- TPH detected in grab groundwater samples collected from borehole PS-GW-6 appears to be migrating onto the Property from off-site sources, including nearby former oil field operations. TPH was detected at 290 µg/L in the grab groundwater sample collected from borehole PS-GW-6 and is less than the

330 μg/L TPH detected in the Cypress Fee monitoring well samples on 13 May 2008 (Arcadis, 2008). The TPH detected at PS-GW-6 is also less than the 980 μg/L of TPH detected in the grab groundwater sample collected from borehole PS-GW-4 on the southwestern corner of the property adjacent to the off-site Unocal station, which was previously closed by the RWQCB with comparable residual levels of TPH remaining in groundwater (EKI, 2008a).

- Again, there is no clear reason to immediately install a monitoring well in this location to investigate speculative sources and in a location that will be destroyed during planned building demolition and grading operations.

2.2.3 Additional Monitoring Wells Requested in the Infield of the Main Track

EKI's opinions regarding the RWQCB's request for two additional groundwater monitoring wells to be installed within the infield area of the Main Track are as follows:

- The grab groundwater sample previously collected from borehole PS-GW-2 contained only 1.6 mg/L nitrate as nitrogen, i.e., well below the California MCL.
- Groundwater samples collected from the Cypress Fee groundwater monitoring wells during 1999, which are east of the Inglewood (Townsite) fault trace on the eastern side of the Main Track, did not contain more than 0.6 mg/L nitrate as nitrogen (AET, 1999).
- The highest nitrate concentrations detected in groundwater on the Property were found at the western Property boundary, particularly in the southwestern corner of the Property as discussed above.
- Groundwater west of the Inglewood (Townsite) fault trace is believed to be migrating onto the Property generally from the west, as shown by the data for the Unocal #5050 site that were presented in the Technical Report and Work Plan, and as shown by the regional groundwater gradient on Figure 2.
- The initial four monitoring wells approved by the RWQCB are adequate to verify this western gradient and to confirm the nitrate concentrations entering the Property west of the Inglewood (Townsite) fault trace.
- Locations of the lined ponds, as well as the roadways and track chutes, which are all located in the infield of the Main Track, significantly limit currently accessible drilling locations. Further, significant soil grading will occur in this area under Track 2 redevelopment.
- There is no clear reason to immediately install two monitoring wells within the Main Track area to investigate speculative nitrogen sources.

2.2.4 Conclusions Regarding Additional Four Monitoring Wells Requested by RWQCB

EKI's conclusions and opinions regarding the additional four groundwater monitoring wells requested by the RWQCB are as follows:

- The additional requested four groundwater monitoring wells are not needed at this time, particularly given the currently anticipated schedule for redevelopment of the Property, projected to begin in 2009, which would result in the destruction of these four wells if constructed at the requested locations.
- Installation of the four approved groundwater monitoring wells will allow evaluation of the water quality and geohydrologic data that can then aid determination of the need for, and preferred locations of, any additional monitoring wells.
- The four originally proposed monitoring wells approved by the RWQCB are sufficient for additional investigations of compounds that appear to be migrating onto the Property from off-site, e.g. potential sources to the west for generally low but measurable concentrations of TPH, perchlorate, and nitrate.
- Monitoring wells on the Property will be deep and expensive to install, and major overexcavation and mass grading will occur during redevelopment activities projected for 2009 that will likely necessitate destruction of monitoring wells installed prior to that time.
- The data that would be obtained from installation of the requested four additional groundwater monitoring wells at this time, i.e., in addition to the four originally proposed monitoring wells approved by the RWQCB, would not provide significant new data and benefit relative to the access problems and cost.
- RWQCB staff had previously agreed no wells would be installed in the Former Dry Cleaning Area at the northern end of the 1,500 foot long Grandstand Building until after demolition (RWQCB, 2007a), which would occur as needed following completion of SVE operations and confirmatory soil sampling as outlined in the SVE Rebound Work Plan (EKI, 2008b).

2.3 RWQCB Finding that Assessment of Stable Area and Main Track Soil is Adequate

In Comment #7 of the 22 August 2008 letter, the RWQCB determined that "assessment of the Stable Area and Main Track area is adequate". HPLC appreciates the RWQCB's response regarding the Stable Area and Main Track soil sampling activities; however, the 22 August 2008 RWQCB letter did not also state that assessment of the Training Track area is complete. The Data Summary Report (EKI, 2006) presented analytical data for soil samples collected from the surface of the Training Track, in a manner consistent with those collected from the surface of the Main Track. To be consistent with the RWQCB's findings regarding the Stable Area and Main Track soils, HPLC requests RWQCB concurrence that assessment of the Training Track soils is adequate, on the basis of the following:

- As was done for the Main Track, soil samples were collected from the surface of the Training Track and analyzed for TPH carbon ranges up to C44, including gasoline-range TPH, as well as polycyclic aromatic hydrocarbons ("PAHs"), metals, hexavalent chromium, PCBs, nitrite as nitrogen, nitrate as nitrogen, and pH.
- These samples of Training Track materials were found to contain only trace levels of TPH, concentrations of metals below screening levels or within naturally occurring levels, and low concentrations of nitrite and nitrate as nitrogen, and all well below the Property-specific Criteria listed in the Soil Management Plan. PCBs were not detected in these soil samples.
- There are no concerns for the current use of the Training Track soils, i.e., for the current commercial use under Track 1, or for future potential residential use under Track 2, based on these data previously presented to the RWQCB (EKI, 2006).

2.4 RWQCB Request for Additional Soil Information and Soil Sampling

In Comment #7 of the 22 August 2008 letter, the RWQCB requested 1) additional information regarding fill soils used during extension of the Main Track and casino construction during 1984; 2) requested submittal of a work plan for additional soil sampling for investigation of TPH in the Former Oil Wells and Impoundment Area; and 3) requested collection of additional soil samples within the infields of the Main Track and the Training Track to be analyzed "for nitrates".

2.4.1 Additional Documentation Regarding 1984 Fill Soils Requested by RWQCB

In Comment #1 of its 22 August 2008 letter, RWQCB staff requested additional documentation, which may include a comparison of historical aerial photographs and information from soil borehole logs, to demonstrate that fill soil used in the construction of the Main Track extension and Casino areas in 1984 is consistent with earlier fill material obtained on the Property for filling elsewhere on the Property. Because HPLC is actively working towards redevelopment of the Property under Track 2, HPLC has agreed to search for additional historical aerial photographs, previously-existing information regarding lithology of fill soils, or other available records that may provide this additionally requested documentation.

However, if previously existing information regarding lithology of these soils is not available or not definitive regarding the source of the 1984 fill soils, EKI's opinion is that boreholes should not be drilled in these areas at this time, for the following reasons:

- These 1984 fill areas have been used for the current commercial land uses, i.e., soil below the Main Track and Casino Building, for nearly 25 years. There are no public exposures to these soils, and HPLC maintenance worker exposure is rare if any. Therefore, no soil investigations are needed for the current commercial land use under Track 1.

- For Track 2, extensive overexcavation and mass grading of these areas will occur, and these soils will be managed in accordance with the approved Soil Management Plan. HPLC's current geotechnical overexcavation plan, provided in Appendix B, shows that between 2 and 25 feet of soil will be removed, then placed and recompacted across the entire Property, with much of the deeper overexcavation occurring in the infields of the Main Track and Training Track. HPLC's mass grading plan, as shown in Appendix B, depicts how approximately 3,000,000 cubic yards of soil will be cut and then replaced on the Property as fill during mass grading.
- Much better inspection of these shallow soils will be allowed when exposed during grading for future redevelopment and evaluated under the protocols described in the approved Soil Management Plan.

2.4.2 Additional Requested Soil Sampling in the Former Oil Wells and Impoundment Area

Comment #6 of the 22 August 2008 RWQCB letter requests submittal of a work plan for further investigation of "TPH contaminated soils" at sample location SB-10 in the Former Oil Wells and Impoundment Area. EKI's opinion is that no additional soil sampling for investigation of detected TPH concentrations in the Former Oil Wells and Impoundment Area is needed, on the basis of the following:

- A total of 79 discrete soil samples have been collected within this area and analyzed for TPH. All results were below the site-specific screening levels in the Soil Management Plan.
- The RWQCB's comment focuses on a single soil sample from borehole SB-10, which was collected at a depth of 20 feet below ground surface ("bgs") and contained diesel-range TPH at 500 milligrams per kilogram ("mg/kg") and motor-oil range TPH at 1,200 mg/kg. The RWQCB requested additional TPH soil analyses "to fully delineate the vertical and lateral extent of TPH soil contamination at sample location SB-10 and the surrounding area in order to demonstrate conclusively that elevated TPH soil concentrations do not exceed TPH soil screening levels and contribute to TPH groundwater contamination at the Property," and required a work plan by 15 November 2008 (now extended 60 days; RWQCB, 2008c; RWQCB, 2008d).
- Groundwater was first encountered at approximately 171.8 feet bgs in a borehole drilled in this area, which is consistent with groundwater elevations observed in the seven nearby groundwater monitoring wells installed by Chevron on the Property, for purposes of monitoring TPH, benzene and tertiary butyl alcohol ("TBA") plumes in groundwater originating on the adjacent, former Cypress Fee site property.
- Therefore, this soil sample collected from borehole SB-10 at a depth of 20 feet is located approximately 152 feet above groundwater, and the RWQCB's screening levels for TPH in this instance would be 10,000 mg/kg for diesel-range TPH and 50,000 mg/kg for motor-oil range TPH (RWQCB, 1996). The detected

concentrations of TPH are at least one order of magnitude less than these RWQCB screening levels.

- The majority of TPH detected in this area is higher molecular weight, e.g., consistent with motor oil, which is not mobile and not likely to migrate to groundwater. Gasoline-range TPH was not detected in this soil sample.
- Deep borehole PS-GW-5 was drilled in this area to a total depth of approximately 180.5 feet bgs for grab groundwater sampling purposes. The borehole log provided in Appendix B noted no hydrocarbon odors and no detections of VOCs above 5.3 parts per million by volume for 14 soil samples collected from this borehole and screened in the field using a hand-held organic vapor meter.
- Significant soil sampling has already been conducted within this area to provide sufficient evidence that residual TPH concentrations do not exceed the applicable screening levels and are not likely to contribute to groundwater contamination. Further, as noted above, Chevron is currently monitoring known groundwater plumes adjacent to this area from off-site sources.
- During redevelopment under Track 2, this area will be managed in accordance with the approved Soil Management Plan, and extensive overexcavation and mass grading are planned. This area will then be substantially overexcavated and regraded, as shown on the overexcavation and mass grading plans provided in Appendix B.

2.4.3 Additional Requested Soil Sampling within Infields of Main Track and Training Track

The RWQCB requested soil sampling in the track infields for nitrates. As discussed above, there is no apparent nitrate problem in groundwater originating on the Property, and these track infield areas have been managed under NPDES permits issued by the RWQCB, as discussed above. EKI's opinion is that no additional soil sampling for investigation of nitrate concentrations in soil within the track infields is needed, on the basis of the following:

- The Property has been extensively reviewed by RWQCB staff in the Storm Water and Enforcement programs.
- The entire storm water system was reconstructed in response to Cease and Desist Order No. 99-106 that was issued on 28 October 1999. The requirements of the Cease and Desist Order were met, and it was rescinded, as discussed above. Photographs showing construction of the liner system installed for the north pond in the infield of the Main Track are provided in Appendix A.
- The property is currently operated under NPDES Permit No. CA0064211, CI-8100, Order No. R4-2006-0062 that was adopted by the RWQCB on 13 July 2006, as discussed above.

- The Main Track and Training Track infields are being irrigated with treated water as described in the NPDES permit as overseen by RWQCB staff. Photographs of the infield of the Main Track are provided in Appendix B.
- Potential drilling locations in the infield of the Main Track are significantly limited by the lined ponds, dirt roadways, and racetrack chutes. These features within the infield of the Main Track are visible on the aerial photograph dated 31 July 2007, which is provided in Appendix B.

2.5 RWQCB Request for Vapor Intrusion Evaluations

Comments #4 and #5 of the 22 August 2008 RWQCB letter requested site-specific vapor intrusion ("VI") evaluations for *unrestricted future land use* to be conducted immediately, under Track 1 (emphasis added). The VI evaluations were requested at the Current Vehicle Maintenance Area and at the Former Track Maintenance Area, respectively, to be performed under the protocols of *Interim Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*, dated 15 December 2004 and revised 7 February 2005 by the Department of Toxic Substances Control (the "DTSC Guidance"; DTSC, 2005). The RWQCB requested submittal of vapor intrusion evaluation reports for these two areas of the Property by 31 December 2008.

2.5.1 Current Vehicle Maintenance Area

EKI's opinion is that no vapor intrusion evaluation for unrestricted future land use is needed at the Current Vehicle Maintenance Area for the following reasons:

- The Current Vehicle Maintenance Area is a working vehicle maintenance garage. HPLC employs practices to protect workers under the California Occupational Safety and Health Administration ("OSHA") rules, for the current commercial uses of this area under Track 1.
- The DTSC Guidance cited by the RWQCB letter states: *"Also, various operations at RCRA and non-RCRA sites are directly regulated by OSHA (e.g., spray booths, plating operations, etc.), and this Guidance does not apply to those specific operations."* Appendix F of the DTSC Guidance also states: *"Hence, workers subject to potential exposure to gases and vapors by the nature of their working environment are regulated under OSHA."*
- As shown on the photograph provided in Appendix C, the eastern side of the Current Vehicle Maintenance Area building is constructed as a "carport", that is, a work bay with open sides. The prior soil gas sampling locations cited in the RWQCB comments were within this portion of the Current Vehicle Maintenance Area that is not enclosed by walls. As such, the Current Vehicle Maintenance Area is an active commercial operation and not even an enclosed structure.
- Under the DTSC guidance, there is no need for vapor intrusion evaluation to evaluate hypothetical commercial/industrial indoor air risks now, and certainly no

need to immediately evaluate "unrestricted" land use VI indoor risks at the Current Vehicle Maintenance Area under Track 1.

- For future redevelopment under Track 2, the Current Vehicle Maintenance Area will be evaluated under the approved Soil Management Plan, including collection of additional soil gas samples, in a manner consistent with intended future land use. This area will also be substantially overexcavated and regraded, as shown on the overexcavation and mass grading plans provided in Appendix B.

2.5.2 Former Track Maintenance Area

EKI's opinion is that no vapor intrusion evaluation for unrestricted future land use is needed at the Former Track Maintenance Area for the following reasons:

- The Former Track Maintenance Area is currently used as an unoccupied grassy portion of the infield of the Main Track and as a portion of the Main Track turf racecourse. Photographs of the Former Track Maintenance Area are provided in Appendix C.
- There are no existing structures or buildings located in the Former Track Maintenance Area; therefore, there are no building occupants potentially exposed by vapor intrusion.
- DTSC Guidance cited by the RWQCB letter states: *"If buildings are not located near areas of concern, vapor intrusion is not possible and no further consideration of the exposure pathway should be needed."*
- Inasmuch as there are occupied structures in this area, under the cited DTSC guidance, there is no need for vapor intrusion evaluation to evaluate hypothetical commercial/industrial indoor air risk now, and certainly no need to immediately evaluate "unrestricted" land use VI indoor risks at the Former Track Maintenance Area under Track 1.
- For future redevelopment under Track 2, the Former Track Maintenance Area will be evaluated under the approved Soil Management Plan, including collection of additional soil gas samples, in a manner consistent with intended future land use. This area will also be substantially overexcavated and regraded, as shown on the overexcavation and mass grading plans provided in Appendix B.

2.6 RWQCB Comments Regarding the Former Dry Cleaning Area

In Comment #3 of its 22 August 2008 letter, the RWQCB referenced its 20 August 2008 letter regarding the Former Dry Cleaning Area, which was issued separately. The 20 August 2008 RWQCB letter approved the SVE Rebound Work Plan and requested additional investigations.

2.6.1 Current Conditions in the Former Dry Cleaning Area

In its 20 August 2008 letter, the RWQCB requested additional soil confirmation soil sampling and drilling of an additional deep soil borehole for soil logging purposes in this area, beyond the drilling and soil sampling proposed in the approved SVE Rebound Work Plan. Additional information is provided below to clarify that the additional drilling and soil sampling requested by the RWQCB may not be feasible or may not produce significant new information at this time, given the current access constraints in the Former Dry Cleaning Area. The current conditions in the Former Dry Cleaning Area are as follows:

- Dry cleaning operations former located within the Grandstand Building were discontinued in 1999, and this area is currently being remediated by SVE.
- The interior portion of the Former Dry Cleaning Area measures approximately 25 feet by 35 feet, and it is located in the northern end of the Grandstand Building, which is a multistory structure approximately 1,500 feet long. This area is shown on Figure 5 provided in Appendix D.
- The Former Dry Cleaning Area is currently used as a laundry room filled with equipment for pressing clothes and racks for hanging clothes. The entrance to the Former Dry Cleaning Area is only four feet wide. Therefore, only limited access drilling equipment must be used, as done in the past as shown on the photograph in Appendix D.
- As shown on Figure 5 in Appendix D, the exterior area immediately north of the Grandstand Building is occupied by the boiler room, a staircase, and a steeply sloped hill, the alcove for the large roll-off trash compactor, the SVE system and associated piping, the deep SVE well SVE-1, and soil gas monitoring probes SGMP-1 and SGMP-2, as wells as a buried large storm drain box culvert that measures approximately 7.5 feet wide. This area is bounded by fencing, retaining walls, landscaping and trees, and a horse path. Photographs of this exterior area are provided in Appendix D. Therefore, available drilling locations in this area are greatly limited specifically to the location of prior borehole PS-GW-1.
- There are no current worker health risks for the current commercial use under Track 1 that are not being addressed by the SVE system.

Key analytical data and information previously submitted to the RWQCB regarding the Former Dry Cleaning Area is as follows:

- Borehole PS-GW-1 was drilled at a distance of approximately 24 feet from the location of the former dry cleaning machine. At the ground surface, borehole SVE-1 was drilled at a distance of approximately 22 feet from the location of the former dry cleaning machine. Borehole SVE-1 slants underneath the Grandstand Building and directly underneath the location of the former dry cleaning machine. These locations are shown on Figure 5.
- Any deep borehole to be drilled in the Former Dry Cleaning Area under current conditions must be drilled within a few feet of the prior PS-GW-1 and SVE-1 locations, i.e., currently the only accessible drilling locations.
- Borehole logs for the PS-GW-1 and SVE-1 locations were previously submitted to the RWQCB. Copies of these two deep borehole logs are provided in Appendix D. Borehole PS-GW-1 was logged on five foot intervals to a depth of 20 feet bgs, then on 10 foot intervals to the total borehole depth of approximately 130.5 feet bgs. Borehole SVE-1 was logged on five foot intervals to the total borehole length of approximately 55.5 feet.[2]
- These PS-GW-1 and SVE-1 borehole logs were prepared by California Registered Geologists and show that the encountered soil types were logged in accordance with the Unified Soil Classification System ("USCS") as sand, sand with silt (containing 30% or less silt), silty sand (containing 30% or less silt), clayey sand (containing 25% or less clay), sand with clay (containing 5% or less clay), or sand with gravel (containing 20% or less gravel).
- Laboratory analytical results for soil samples collected from the PS-GW-1 and SVE-1 boreholes, as well as other boreholes drilled in the Former Dry Cleaning Area were previously submitted to the RWQCB.
- Soil samples collected by EKI in the Former Dry Cleaning Area for VOC analyses were prepared using U.S. EPA Method 5035 protocols.
- The soil lithology information previously submitted to the RWQCB is sufficient to demonstrate that soils below the Former Dry Cleaning Area primarily consist of fine to coarse-grained sands, with intervals containing 30% or less silt or 25% or less clay, and that there are no indications of lithologic units that would cause significant lateral migration of PCE in soil.
- The analytical data previously submitted to the RWQCB for soil samples collected from borehole PS-GW-1 indicate that PCE has not migrated laterally at significant concentrations at a distance of approximately 24 feet from the former machine location. The analytical data previously submitted to the RWQCB for soil samples collected from slanted borehole SVE-1 confirm this finding; this borehole begins approximately 22 feet from the former dry cleaning machine location and passes below the former dry cleaning machine location.

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[2] Borehole SVE-1 is drilled at an approximately 35 degree angle from vertical; therefore, the total depth of the borehole from the ground surface is approximately 45 feet bgs (EKI, 2008b).

Based on the above access constraints, the approved SVE Rebound Work Plan proposes confirmation soil sample collection within the Former Dry Cleaning Area as follows:

- The SVE Rebound Work Plan proposes collection of soil samples from four boreholes advanced to refusal, or to a maximum depth of 30 feet bgs, whichever is less. Based on prior drilling experience in the Former Dry Cleaning Area, the SVE Rebound Work Plan is essentially proposing soil sampling to the deepest depths currently feasible given drilling access constraints, which may be shallower than 30 feet bgs as noted in the Data Summary Report (EKI, 2006). Therefore, deeper confirmation soil samples cannot likely be collected now due to access constraints inside the building.
- The SVE Rebound Work Plan proposes collection of soil samples at 1 foot bgs, 5 feet bgs, and every five feet thereafter, to the bottom of each borehole. HPLC is planning to analyze each soil sample collected on these intervals, and as noted above, HPLC is planning to drill the boreholes to the deepest feasible depths given the current constraints. Therefore, all collected soil samples will be analyzed.

2.6.2 HPLC Conclusions Regarding the Former Dry Cleaning Area

EKI's conclusions and opinions regarding the comments on the Former Dry Cleaning Area in the 20 August 2008 RWQCB letter are as follows:

- The RWQCB requested drilling of a new deep borehole in the Former Dry Cleaning Area, but an additional deep borehole is only possible next to the prior PS-GW-1 borehole and such a borehole would not be expected to provide new or necessary data at this time.
- The RWQCB requested that soil samples intended for VOC analyses be collected using U.S. EPA Method 5035 or 5035A protocols. The SVE Rebound Work Plan already provides for collection of samples using U.S. EPA Method 5035, as follows:
  - The SVE Rebound Work Plan states that "Field methods and procedures will be as described previously in the SVE Work Plan." The SVE Work Plan is Section 7 of the Data Summary Report (EKI, 2006), which included field methods and procedures described in its Appendix E. These field methods state that *"Discrete samples to be analyzed for VOCs were collected in and transported to the laboratory in EnCore ™ samplers. EnCore ™ samples were collected and prepared for analysis using United States Environmental Protection Agency ("EPA") Method 5035 and California Department of Toxic Substances Control ("DTSC") Hazardous Materials Laboratory's standard operating procedure ("SOP") 732-S entitled Guide for Field Sampling with Encore ™ Sampler for VOC Analysis, dated October 1998."*

- The RWQCB should note that the prior soil samples collected at the Property by EKI and intended for VOC analyses were collected using the U.S. EPA Method 5035 protocols.

- The RWQCB's request that collection of confirmation soil samples in a given borehole continue until two consecutive soil samples concentrations are found to be non-detect for PCE may either be unnecessary or infeasible, depending on the results of the approved drilling and soil confirmation sampling described in the SVE Rebound Work Plan (EKI, 2008b).
- The RWQCB requested a site-specific vapor intrusion evaluation for the Former Dry Cleaning Area, according to the DTSC Guidance, if PCE concentrations in shallow soil gas, i.e., at five feet bgs or less, are above the California Human Health Screening Level ("CHHSL") following completion of SVE remediation in the Former Dry Cleaning Area. HPLC would like to clarify the following:
  - As long as commercial operations continue under Track 1 following completion of SVE rebound testing, and if PCE concentrations are found to remain in shallow soil gas at concentrations above the CHHSLs published by the California Environmental Protection Agency ("CalEPA") for commercial/industrial land use, HPLC will conduct a site-specific vapor intrusion evaluation as needed for protection of commercial/industrial workers in this area.
  - For redevelopment under Track 2, following completion of SVE remediation, the Former Dry Cleaning Area will be evaluated under the approved Soil Management Plan, which would include evaluation of remaining detectable concentrations of PCE in soil or soil gas, if any present, in a manner consistent with the intended future land use(s). This area will be overexcavated and regraded, as shown on the overexcavation and mass grading plans provided in Appendix B. The Soil Management Plan includes a framework for HPLC to evaluate concentrations of VOCs found in shallow soil gas on the Property and to discuss these areas with the RWQCB in the future.

2.7 HPLC Current Plans Regarding the Property and Other Comments by RWQCB

As discussed during the 11 September 2008 meeting, HPLC is actively pursuing redevelopment, i.e., Track 2, and anticipates circulation of the draft Environmental Impact Report for the Property in October.

Further, HPLC is making arrangements to implement the approved monitoring well installation, groundwater sampling and soil sampling activities described in the Technical Report and Work Plan, as referenced in Comments #2, #8, and #9 of the 22 August 2008 RWQCB letter, respectively. The proposed soil borehole and groundwater monitoring well locations are shown on Figure 2. The groundwater monitoring well locations have been shifted slightly from the prior mapped locations shown in the Technical Report and

Work Plan to accommodate access and land planning constraints. Figure 2 reflects the updated proposed monitoring well locations. Further, HPLC plans to conduct the quarterly groundwater monitoring and reporting for the four originally proposed monitoring wells, as approved and requested in the 13 August 2008 RWQCB letter. HPLC will inform RWQCB staff when drilling for the four monitoring wells is scheduled.

HPLC appreciates your concurrence with the revised arsenic soil screening level of 9 mg/kg, as noted in Comment #10 of the 22 August 2008 RWQCB letter.

HPLC requests that you review this additional technical information and contact EKI to arrange a meeting with HPLC representatives for purposes of reaching agreement regarding the additional work requested in the three RWQCB comment letters issued on 13, 20, and 22 August 2008. If agreement regarding these issues is not reached between RWQCB staff and HPLC representatives by 11 November 2008, then HPLC will request an additional 60-day extension of the dates noted in the 17 September 2008 letter.

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Note:

1. All locations are approximate.

N

0 10000 20000

(Approximate Scale in Feet)

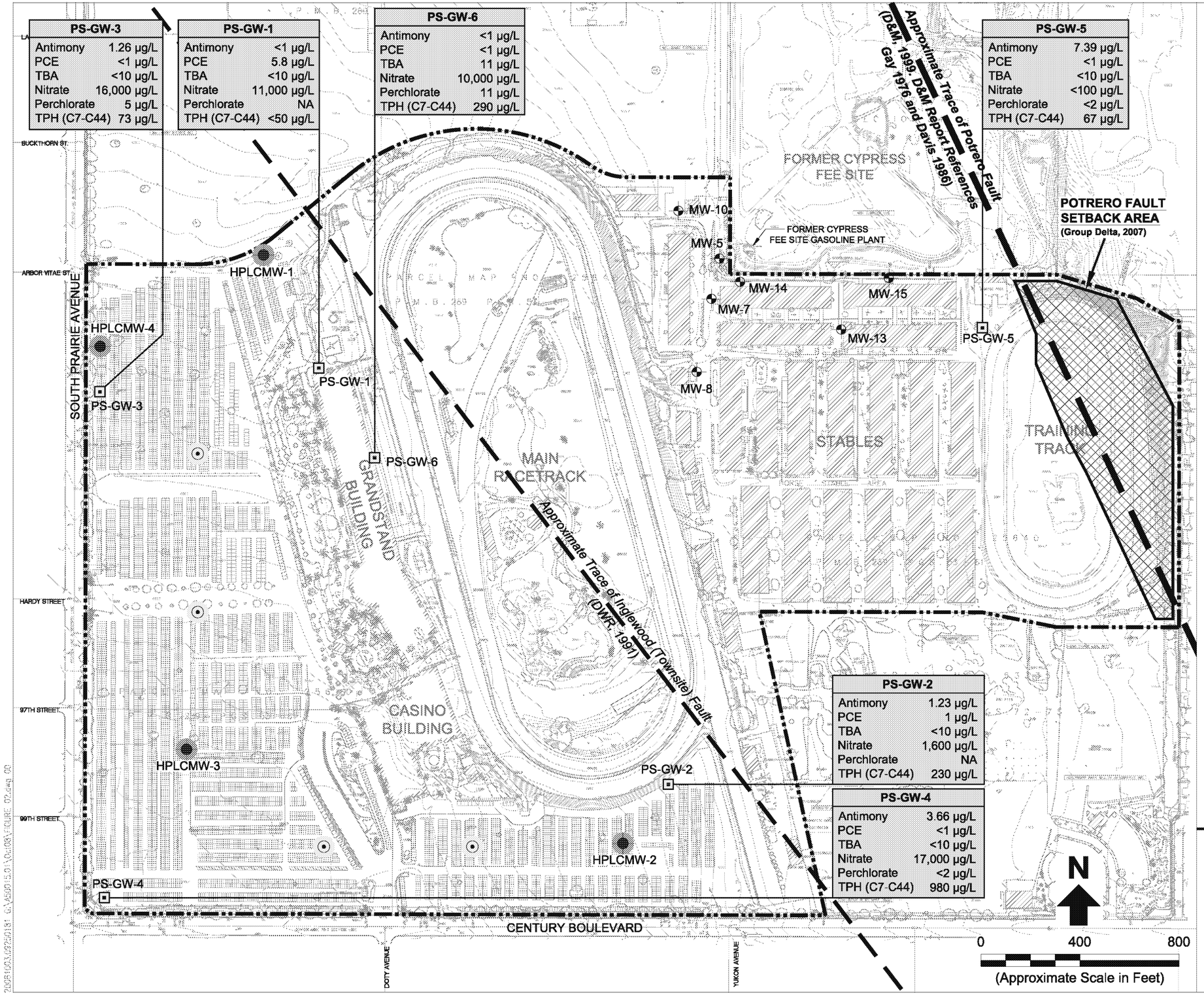
Erler & Kalinowski, Inc.

Hollywood Park Location Map

Hollywood Park
Inglewood, CA
October 2008
EKI A50015.01

Figure 1

20081002 153425 G:\A50015.01\Oct08\FIGURE 01.dwg Figure 01



Legend:

- Approximate Property Boundary
- Grab Groundwater Sampling Location (EKI, 2005)
- Existing Chevron Monitoring Well
- Proposed Groundwater Monitoring Well Location
- Proposed Soil Sample Location

Abbreviations:

µg/L = micrograms per liter
NA = not analyzed for constituent
PCE = tetrachloroethene
TBA = tert-butyl alcohol
TPH = total petroleum hydrocarbons

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Notes:

1. All locations are approximate.
2. Basemap source: ALTA/ACSM Land Title Survey for Hollywood Park, Inc. prepared by PSOMAS, West Los Angeles, California, updated 20 July 2005.
3. Grab groundwater sampling locations surveyed by PSOMAS of West Los Angeles, 11 through 14 July 2005.

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Proposed Monitoring Well and Soil Sample Locations

Hollywood Park
Inglewood, CA

October 2008
EKI A50015.01

Figure 2

Legend:

- Groundwater Monitoring Well Location
- Abandoned Groundwater Monitoring Well
- Grab Groundwater Sampling Location
- Approximate Property Boundary
- Approximate Groundwater Flow Direction
- (-2.4 feet msl) Groundwater Elevations Measured in EKI Grab Groundwater Boreholes in 2005 (feet mean sea level)
- Approximate Boundary of Nearby Site
- 10 mg/L Nitrate as Nitrogen Concentration in Groundwater or Grab Groundwater Samples

Abbreviations:

mg/L = milligrams per liter

Notes:

1. All locations are approximate.
2. Basemap source: 7.5 Minute Series USGS Topographical Map, Inglewood, California, Photorevised 1981.
3. Nitrate results for grab groundwater samples collected from PS-GW-1 through PS-GW-6 are from 2005 (EKI, 2006). Nitrate results for groundwater samples collected from EW-1 and MW-1 through MW-15 are from 1999 (AET, 1999). Nitrate results for INGLEWOOD 1 are from 2006 to 2008 (WRDSC, 2008).

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8. WRDSC, 2007. *Regional Groundwater Monitoring Report Central and West Coast Basins Los Angeles County, California, Water Year 2005-2006,* Water Replenishment District of Southern California, April 2007.
9. WRDSC, 2008. *Water Quality Report for WRD ID: 100095, State ID: 2S/14W-28M07S,* Water Replenishment District of Southern California, accessed 5 September 2008.

Erler & Kalinowski, Inc.

Regional Nitrate Concentrations in Groundwater

Hollywood Park
Inglewood, CA
October 2008
EKI A50015.01

Figure 3

APPENDIX A

Technical Information Related to Regional and Local Nitrate Issues in Shallow Groundwater

Excerpt from *Nitrate and Agriculture in California*,
The Nitrate Working Group,
California Department of Food and Agriculture,
February 1989

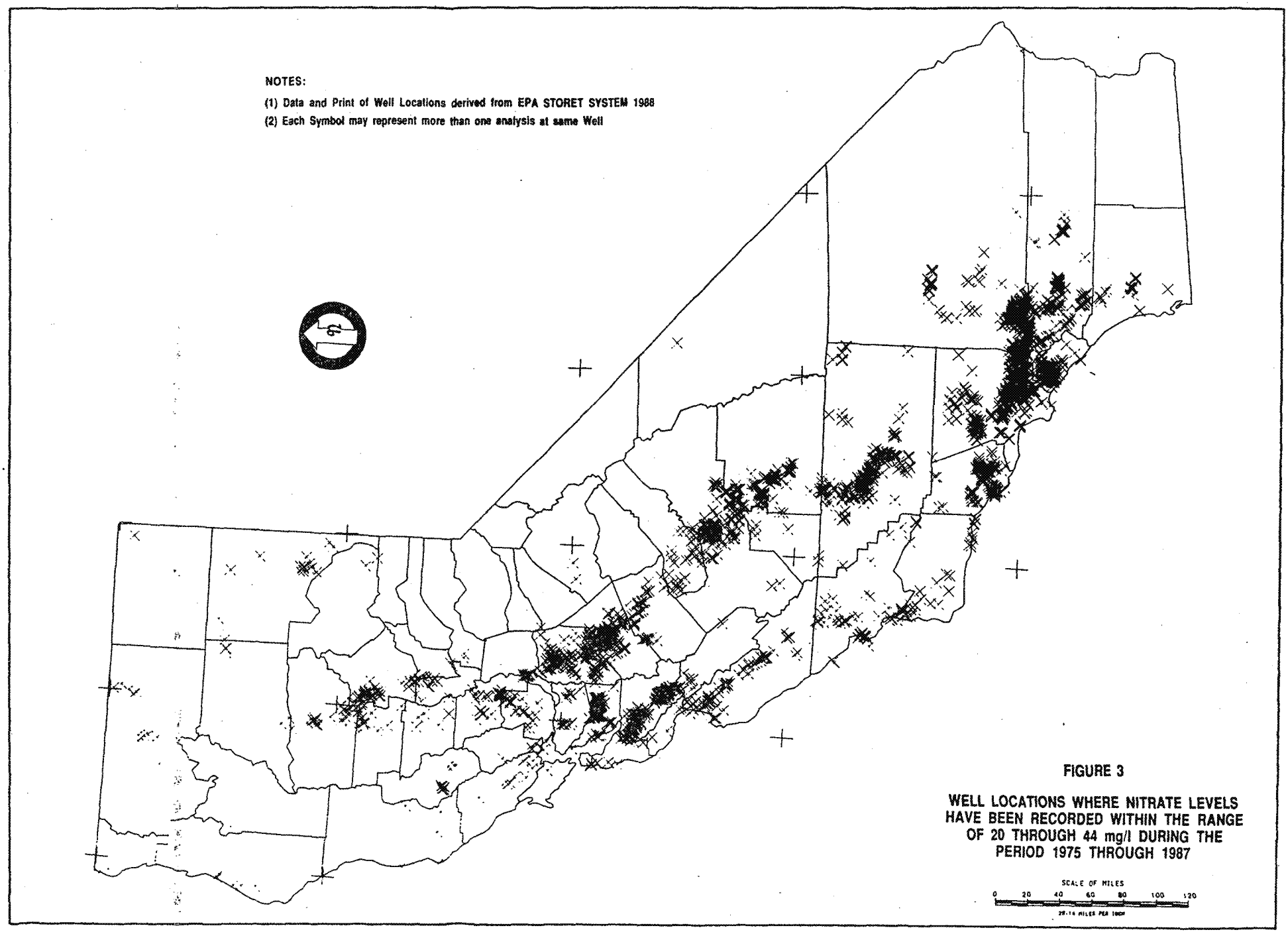

FIGURE 3

WELL LOCATIONS WHERE NITRATE LEVELS HAVE BEEN RECORDED WITHIN THE RANGE OF 20 THROUGH 44 mg/l DURING THE PERIOD 1975 THROUGH 1987

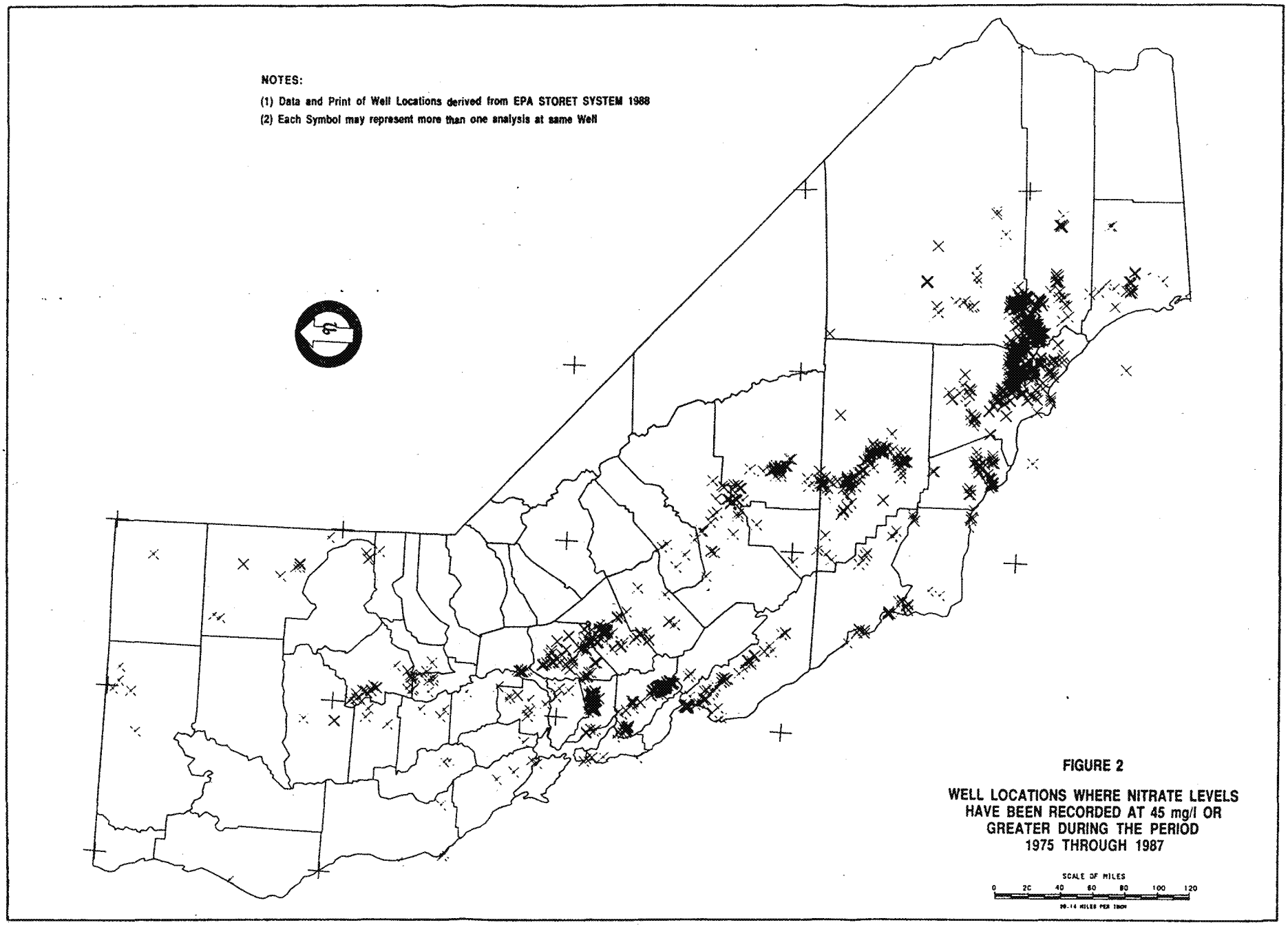

FIGURE 2

WELL LOCATIONS WHERE NITRATE LEVELS HAVE BEEN RECORDED AT 45 mg/l OR GREATER DURING THE PERIOD 1975 THROUGH 1987

Excerpts from *Regional Groundwater Monitoring Report Central and West Coast Basins Los Angeles County, California, Water Year 2005-2006*, Water Replenishment District of Southern California, April 2007

TABLE 1.1
CONSTRUCTION INFORMATION FOR WRD NESTED MONITORING WELLS

Well Name	Zone	WRD ID Number	Depth of Well (feet)	Top of Perforation (feet)	Bottom of Perforation (feet)	Aquifer Designation
Hawthorne #1	1	100887	990	910	950	Sunnyside
	2	100888	730	710	730	Silverado
	3	100889	540	520	540	Silverado
	4	100890	420	400	420	Silverado
	5	100891	260	240	260	Lynwood
	6	100892	130	110	130	Gage
Huntington Park #1	1	100005	910	890	910	Silverado
	2	100006	710	690	710	Jefferson
	3	100007	440	420	440	Gage
	4	100008	295	275	295	Exposition
	5	100009	134	114	134	Gaspur
Inglewood #1	1	100091	1400	1380	1400	Pico Formation
	2	100092	Abandoned Well			
	3	100093	450	430	450	Silverado
	4	100094	300	280	300	Lynwood
	5	100095	170	150	170	Gage
Inglewood #2	1	100824	860	800	840	Pico Formation
	2	100825	470	450	470	Sunnyside
	3	100826	350	330	350	Silverado
	4	100827	245	225	245	Lynwood
Lakewood #1	1	100024	1009	989	1009	Sunnyside
	2	100025	660	640	660	Silverado
	3	100026	470	450	470	Lynwood
	4	100027	300	280	300	Gage
	5	100028	160	140	160	Artesia
	6	100029	90	70	90	Bellflower
La Mirada #1	1	100876	1150	1130	1150	Sunnyside
	2	100877	985	965	985	Silverado
	3	100878	710	690	710	Lynwood
	4	100879	490	470	490	Jefferson
	5	100880	245	225	245	Gage
Lomita #1	1	100818	1340	1240	1260	Sunnyside
	2	100819	720	700	720	Sunnyside
	3	100820	570	550	570	Silverado
	4	100821	420	400	420	Silverado
	5	100822	240	220	240	Gage
	6	100823	120	100	120	Gage
Long Beach #1	1	100920	1470	1430	1450	Sunnyside
	2	100921	1250	1230	1250	Sunnyside
	3	100922	990	970	990	Silverado
	4	100923	619	599	619	Lynwood
	5	100924	420	400	420	Jefferson
	6	100925	175	155	175	Gage
Long Beach #2	1	101740	1090	970	990	Sunnyside
	2	101741	740	720	740	Sunnyside
	3	101742	470	450	470	Silverado
	4	101743	300	280	300	Lynwood
	5	101744	180	160	180	Gage
	6	101745	115	95	115	Gaspur

TABLE 4.3
WEST COAST BASIN WATER QUALITY RESULTS
REGIONAL GROUNDWATER MONITORING - WATER YEAR 2005/2006

Water Quality Constituents	Units	MCL	MCL Type	Inglewood #1	Inglewood #1	Inglewood #1	Inglewood #1	Inglewood #1	Inglewood #1	Inglewood #1	Inglewood #1
				Zone 1	Zone 1	Zone 3	Zone 3	Zone 4	Zone 4	Zone 5	Zone 5
				05/24/06	09/28/06	05/25/06	09/28/06	05/25/06	09/28/06	05/25/06	09/28/06
Total Dissolved Solid (TDS)	mg/l	1000	S	**2400**	**2440**	**1060**	**1100**	770	826	**1130**	**1290**
Cation Sum	meq/l			41	43	18	17	13	12	20	19
Anion Sum	meq/l			43	43	17	19	13	13	19	20
Iron, Total, ICAP	mg/l	0.3	S	0.17	**0.38**	**0.38**	**0.37**	**0.33**	**0.31**	ND	ND
Manganese, Total, ICAP/MS	ug/l	50	S	25	24	**260**	**300**	**170**	**190**	2.2	2.5
Turbidity	NTU	5	S	0.75	1.1	2.1	2.3	1.3	2	0.75	1.3
Alkalinity	mg/l			820	806	270	298	230	226	279	257
Boron	mg/l			5	4.7	0.39	0.4	0.19	0.19	0.24	0.24
Bicarbonate as HCO3,calculated	mg/l			998	980	329	360	280	280	340	310
Calcium, Total, ICAP	mg/l			140	130	120	120	97	96	180	170
Carbonate as CO3, Calculated	mg/l			5.2	5.1	ND	ND	ND	ND	ND	ND
Hardness (Total, as CaCO3)	mg/l			555	520	493	490	415	410	697	670
Chloride	mg/l	500	S	**885**	**890**	310	350	230	230	360	400
Fluoride	mg/l	2	P	0.27	0.37	0.49	0.61	0.4	0.5	0.24	0.33
Hydroxide as OH, Calculated	mg/l			ND	ND	ND	ND	ND	ND	ND	ND
Langelier Index - 25 degree	None			1.6	1.6	1	1	0.9	0.8	0.7	0.9
Magnesium, Total, ICAP	mg/l			50	47	47	47	42	42	60	59
Mercury	ug/l	2	P	ND	ND	ND	ND	ND	ND	ND	ND
Nitrate-N by IC	mg/l	10	P	ND	ND	ND	ND	ND	ND	9.4	9.3
Nitrite, Nitrogen by IC	mg/l	1	P	ND	ND	ND	ND	ND	ND	ND	ND
Potassium, Total, ICAP	mg/l			17	17	6.9	7.1	9.2	9.2	7.1	7.3
Sodium, Total, ICAP	mg/l			680	750	180	170	97	92	130	130
Sulfate	mg/l	500	S	67	66	130	130	88	94	140	140
Surfactants	mg/l	0.5	S	0.091	0.09	0.054	ND	ND	ND	ND	ND
Total Nitrate, Nitrite-N, CALC	mg/l			ND	ND	ND	ND	ND	ND	9.4	9.3
Total Organic Carbon	mg/l			38	42	1.2	1.2	0.75	0.63	0.68	0.65
Carbon Dioxide	mg/l			21	20	8.6	9.4	5.8	7.3	22	13
General Physical											
Apparent Color	ACU	15	S	**200**	**150**	10	10	10	10	ND	ND
Lab pH	Units			7.9	7.9	7.8	7.8	7.9	7.8	7.4	7.6
Odor	TON	3	S	**4**	**8**	1	2	1	2	1	1
pH of CaCO3 saturation(25C)	Units			6.3	6.3	6.8	6.8	7	7	6.7	6.7
pH of CaCO3 saturation(60C)	Units			5.9	5.9	6.4	6.4	6.6	6.6	6.2	6.3
Specific Conductance	umho/cm	1600	S	**4170**	**4100**	**1750**	**1800**	1320	1300	**1970**	**2000**
Metal											
Aluminum, Total, ICAP/MS	ug/l	1000	P	ND	ND	ND	ND	ND	ND	ND	ND
Antimony, Total, ICAP/MS	ug/l	6	P	ND	ND	ND	ND	ND	ND	ND	ND
Arsenic, Total, ICAP/MS	ug/l	50	P	ND	ND	ND	ND	ND	ND	ND	ND
Barium, Total, ICAP/MS	ug/l	1000	P	250	230	41	41	110	110	220	220
Beryllium, Total, ICAP/MS	ug/l	4	P	ND	ND	ND	ND	ND	ND	ND	ND
Chromium, Total, ICAP/MS	ug/l	50	P	ND	ND	ND	ND	ND	ND	1.3	ND
Cadmium, Total, ICAP/MS	ug/l	5	P	ND	ND	ND	ND	ND	ND	ND	ND
Copper, Total, ICAP/MS	ug/l	1000	S	ND	ND	2.7	ND	ND	ND	3.6	ND
Lead, Total, ICAP/MS	ug/l			ND	ND	ND	ND	ND	ND	ND	ND
Nickel, Total, ICAP/MS	ug/l	100	P	7.4	ND	7.6	ND	5.8	ND	12	ND
Selenium, Total, ICAP/MS	ug/l	50	P	ND	ND	ND	ND	ND	ND	6	ND
Silver, Total, ICAP/MS	ug/l	100	S	ND	ND	ND	ND	ND	ND	1.3	ND
Thallium, Total, ICAP/MS	ug/l	2	P	ND	ND	ND	ND	1.8	ND	ND	ND
Zinc, Total, ICAP/MS	ug/l	5000	S	7.3	ND	ND	ND	ND	ND	ND	ND
Volatile Organic Compounds											
Trichloroethylene (TCE)	ug/l	5	P	2.8	2.1	ND	ND	ND	ND	2.3	2
Tetrachloroethylene (PCE)	ug/l	5	P	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethylene	ug/l	6	P	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethylene	ug/l	6	P	ND	ND	ND	ND	ND	ND	ND	ND
trans-1,2-Dichloroethylene	ug/l	10	P	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform (Trichloromethane)	ug/l	100	P	ND	ND	ND	ND	ND	ND	ND	ND
Carbon Tetrachloride	ug/l	0.5	P	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	ug/l	5	P	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethane	ug/l	0.5	P	ND	ND	ND	ND	ND	ND	ND	ND
Fluorotrichloromethane-Freon11	ug/l	150	P	ND	ND	ND	ND	ND	ND	ND	ND
Freon 113	ug/l			ND	ND	ND	ND	ND	ND	ND	ND
Isopropylbenzene	ug/l			ND	ND	ND	ND	ND	ND	ND	ND
n-Propylbenzene	ug/l			ND	ND	ND	ND	ND	ND	ND	ND
m,p-Xylenes	ug/l	1750	P	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	ug/l	5	P	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	ug/l	150	P	ND	ND	ND	ND	ND	ND	ND	ND
Dichlorodifluoromethane	ug/l	1000	S	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	ug/l	1	P	ND	ND	ND	ND	ND	ND	ND	ND
Ethyl benzene	ug/l	700	P	ND	ND	ND	ND	ND	ND	ND	ND
MTBE	ug/l	13	P	ND	ND	ND	ND	ND	ND	ND	ND

MCL: Maximum Contaminant Level, bold value indicates concentration exceeds MCL. (p): Primary MCL (s): Secondary MCL (ND): Not Detected

Excerpt from *Water Quality Report for WRD ID: 100095, State ID: 2S/14W-28M07S*, Water Replenishment District of Southern California, http://gis.wrd.org, Accessed 5 September 2008

WRD

September 05, 2008

Well Construction Report for WRD ID: 100095

State ID : 2S/14W-28M07S

Print Table

WRD ID:	100095	**Well Owner:**	Water Replenishment District of Southern California
State Number:	2S/14W-28M07S	**Owner's Well Name:**	Inglewood1_5

Well Type:	MW	**Latitude:**	33.96695	**Year Drilled**	1998
Well Status:		**Longitude:**	-118.35876	**Year Destroyed:**	

Well Depth:	170	**Top of Perforation:**	150	**Mult. Perf. Intervals?:**	1
Well Diameter:	2	**Base of Perforation:**	170	**Aquifer(s) Perforated:**	

Log Available?:	Y
Casing Type:	PVC80
Drilling Method:	ROT
Data Source:	USGS

For more information, please contact us at:
Water Replenishment District of Southern California
4040 Paramount Boulevard, Lakewood, CA 90712
Phone : (562) 921-5521
Fax: (562) 921-6101

WRD

September 05, 2008

Water Quality Report for WRD ID: 100095

State ID : 2S/14W-28M07S

MCL: 10

Constituents: Nitrate

GRAPH IT

Print Table

Date	Concentration Level	Units
12/8/1998	0	mg/l
5/19/1999	8.5	mg/l
10/19/1999	8.66	mg/l
5/22/2000	9.93	mg/l
10/5/2000	10.6	mg/l
5/23/2001	10.5	mg/l
3/5/2002	9.6	mg/l
11/17/2002	10	mg/l
9/9/2003	7.2	mg/l
5/11/2004	6.8	mg/l
9/28/2004	7.6	mg/l
3/30/2005	8.3	mg/l
9/19/2005	8.64	mg/l
5/25/2006	9.4	mg/l
9/28/2006	9.3	mg/l
4/23/2007	8.2	mg/l
8/28/2007	8.5	mg/l
5/20/2008	8.8	mg/l

GRAPH IT

For more information, please contact us at:

Water Replenishment District of Southern California
4040 Paramount Boulevard, Lakewood, CA 90712
Phone : (562) 921-5521
Fax: (562) 921-6101

Excerpt from *Water Quality Report for WRD ID: 100093, State ID: 2S/14W-28M05S*, Water Replenishment District of Southern California, http://gis.wrd.org, Accessed 5 September 2008

WRD

September 05, 2008

Well Construction Report for WRD ID: 100093

State ID : 2S/14W-28M05S

Print Table

WRD ID:	100093	**Well Owner:**	Water Replenishment District of Southern California
State Number:	2S/14W-28M05S	**Owner's Well Name:**	Inglewood1_3

Well Type:	MW	**Latitude:**	33.96695	**Year Drilled**	1998
Well Status:		**Longitude:**	-118.35876	**Year Destroyed:**	

Well Depth:	450	**Top of Perforation:**	430	**Mult. Perf. Intervals?:**	1
Well Diameter:	2	**Base of Perforation:**	450	**Aquifer(s) Perforated:**	

Log Available?:	Y
Casing Type:	PVC80
Drilling Method:	ROT
Data Source:	USGS

For more information, please contact us at:
Water Replenishment District of Southern California
4040 Paramount Boulevard, Lakewood, CA 90712
Phone : (562) 921-5521
Fax: (562) 921-6101

WRD

September 05, 2008

Water Quality Report for WRD ID: 100093

State ID : 2S/14W-28M05S

MCL: 10

Constituents: Nitrate

GRAPH IT

Print Table

Date	Concentration Level	Units
12/8/1998	0	mg/l
5/19/1999	0	mg/l
10/20/1999	0	mg/l
5/22/2000	0	mg/l
10/5/2000	0	mg/l
5/23/2001	0	mg/l
3/5/2002	0	mg/l
11/17/2002	0	mg/l
9/9/2003	0	mg/l
5/11/2004	0	mg/l
9/28/2004	0	mg/l
3/30/2005	0	mg/l
9/19/2005	0	mg/l
5/25/2006	0	mg/l
9/28/2006	0	mg/l
4/23/2007	0	mg/l
8/28/2007	0	mg/l
5/20/2008	0	mg/l

GRAPH IT

For more information, please contact us at:

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City of Inglewood 2008 Annual Water Quality Report

Additional Technical Information
Hollywood Park, Inglewood, California

3 October 2008
(EKI A50015.01)

CITY OF INGLEWOOD 2008 ANNUAL WATER QUALITY REPORT

Since 1991, California water utilities have been providing information on water served to its consumers. This report is a snapshot of the tap water quality that we provided last year. Included are details about where your water comes from, how it is tested, what is in it, and how it compares with state and federal limits. We strive to keep you informed about the quality of your water, and to provide a reliable and economic supply that meets all regulatory requirements.

Where Does My Tap Water Come From? —Your tap water comes from 2 sources: groundwater and surface water. We pump groundwater from local, deep wells. We also use Metropolitan Water District of Southern California's (MWD) surface water from both the Colorado River and the State Water Project in northern California. The quality of our groundwater and MWD's surface water supplies is presented in this report.

How is My Drinking Water Tested? —Your drinking water is tested regularly for unsafe levels of chemicals, radioactivity and bacteria at the source and in the distribution system. We test weekly, monthly, quarterly, annually or less often depending on the substance. State and federal laws allow us to test some substances less than once per year because their levels do not change frequently. All water quality tests are conducted by specially trained technicians in state-certified laboratories.

What Are Drinking Water Standards? —The U.S Environmental Protection Agency (USEPA) limits the amount of certain substances allowed in tap water. In California, the State Department of Health Services (Department) regulates tap water quality by enforcing limits that are at least as stringent as the USEPA's. Historically, California limits are more stringent than the Federal ones.

There are two types of these limits, known as standards. Primary standards protect you from substances that could potentially affect your health. Secondary standards regulate substances that affect the aesthetic qualities of water. Regulations set a Maximum Contaminant Level (MCL) for each of the primary and secondary standards. The MCL is the highest level of a substance that is allowed in your drinking water.

Public Health Goals (PHGs) are set by the California Environmental Protection Agency. PHGs provide more information on the quality of drinking water to customers, and are similar to their federal counterparts, Maximum Contaminant Level Goals (MCLGs). PHGs and MCLGs are advisory levels that are nonenforceable. Both PHGs and MCLGs are concentrations of a substance below which there are no known or expected health risks.

How Do I Read the Water Quality Table? —Although we test for over 100 substances, regulations require us to report only those found in your water. The first column of the water quality table lists substances detected in your water. The next columns list the average concentration and range of concentrations found in your drinking water. Following are columns that list the MCL and PHG or MCLG, if appropriate. The last column describes the likely sources of these substances in drinking water.

To review the quality of your drinking water, compare the highest concentration and the MCL. Check for substances greater than the MCL. Exceedence of a primary MCL does not usually constitute an immediate health threat. Rather, it requires testing the source water more frequently for a short duration. If test results show that the water continues to exceed the MCL, the water must be treated to remove the substance, or the source must be removed from service.

Why Do I See So Much Coverage in the News About the Quality Of Tap Water? —The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs and wells. As water travels over the surface of the land or through the ground, it dissolves naturally occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in source water include:

- Microbial contaminants, including viruses and bacteria, that may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife;
- Inorganic contaminants, such as salts and metals, that can be naturally-occurring or result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining or farming;
- Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban stormwater runoff, and residential uses;
- Organic chemical contaminants, including synthetic and volatile organic chemicals, that are byproducts of industrial processes and petroleum production, and can also come from gas stations, urban stormwater runoff, agricultural application, and septic systems;
- Radioactive contaminants, which can be naturally occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, the U.S. Environmental Protection Agency (USEPA) and the State Department of Public Health (Department) prescribe regulations that limit the amount of certain contaminants in water provided by public water systems. Department regulations also establish limits for contaminants in bottled water that must provide the same protection for public health.

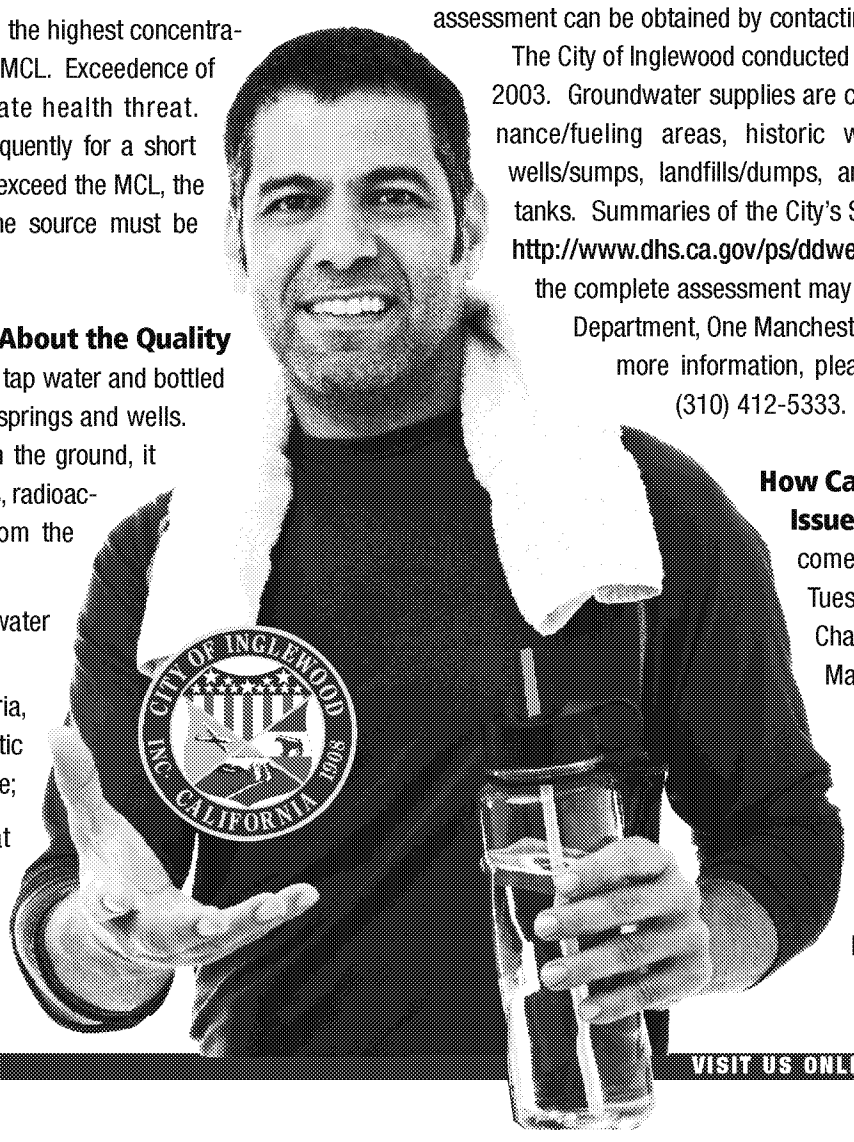
All drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the USEPA's Safe Drinking Water Hotline(1-800-426-4791). You can also get more information on tap water by logging on to these helpful web sites:

- USEPA's web site: **www.epa.gov/OGWDW**
- Department website: **www.cdph.ca.gov/programs/Pages/DWP.aspx**

Should I Take Additional Precautions? —Some people may be more vulnerable to contaminants in drinking water than the general population. Immunocompromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. The USEPA/Centers for Disease Control guidelines on appropriate means to lessen the risk of infection of *Cryptosporidium* and other microbial contaminants are available from the USEPA's Safe Drinking Water Hotline (1-800-426-4791).

Source Water Assessment —MWD completed an assessment of its Colorado River and State Water Project supplies in 2002. Colorado River supplies are considered most vulnerable to recreation, urban/storm water runoff, increasing urbanization in the watershed, and wastewater. State Water Project supplies are considered most vulnerable to urban/storm water runoff, wildlife, agriculture, recreation and wastewater. A copy of the assessment can be obtained by contacting MWD at (213) 217-6850.

The City of Inglewood conducted an assessment of its groundwater supplies in 2003. Groundwater supplies are considered most vulnerable to airport maintenance/fueling areas, historic waste dumps/landfills, injection wells/dry wells/sumps, landfills/dumps, and confirmed leaking underground storage tanks. Summaries of the City's Source Water Assessments may be viewed at **http://www.dhs.ca.gov/ps/ddwem/dwsap/DWSAPindex.htm** and a copy of the complete assessment may be viewed at: City of Inglewood, Pubic Works Department, One Manchester Blvd., Suite 300, Inglewood, CA 90301. For more information, please contact the Public Works Department at (310) 412-5333.



How Can I Participate in Decisions On Water Issues That Affect Me? —The public is welcome to attend City Council meetings, every Tuesday evening at 7:00 p.m. in the City Council Chambers, 9th floor of City Hall, located at One Manchester Boulevard, Inglewood, CA 90301

How Do I Contact My Water Agency If I Have Any Questions About Water Quality? —If you have specific questions about your tap water quality, please contact Glen W. C. Kau, Public Works Director, (310) 412-5333

CITY OF INGLEWOOD

2008 Annual Water Quality Report

Results are from the most recent testing performed in accordance with state and federal drinking water regulations

PRIMARY STANDARDS MONITORED AT THE SOURCE-MANDATED FOR PUBLIC HEALTH

INORGANIC CHEMICALS Sampled from 2006 to 2007	GROUNDWATER		MWD'S SURFACE WATER		PRIMARY	MCLG	MAJOR SOURCES IN DRINKING WATER
	AVERAGE	RANGE	AVERAGE	RANGE	MCL	or PHG	
Aluminum (mg/l)	ND	ND	0.08	ND-0.14	1	.06 (a)	Erosion of natural deposits; residue from surface water treatment processes
Arsenic (µg/l)	ND	ND	ND	ND-2.8	10	.004 (a)	Erosion of natural deposits; glass/electronics production wastes; runoff
Barinum (mg/l)	ND	ND	ND	ND-0.10	1	2 (a)	Oil drilling waste and metal refinery discharge; erosion of natural deposits
Fluoride (mg/l)	0.32	0.27-0.36	-	.06-1.0	2.0	1 (a)	Erosion of natural deposits, water additive that promotes strong teeth
Nitrate (mg/l as NO3)	ND	ND	2.2	ND-3.5	45	45 (a)	Runoff and leaching from fertilizer use/septic tanks/sewage, natural erosion
Perchlorate (µg/l)	NA	NA	ND	ND-4.1	6	6 (a)	Perchlorate is used in solid rocket propellant, fireworks, explosives, flares, matches, and a variety of industries. It usually gets into drinking water as a result of environmental contamination from historic aerospace or other industrial operations that used or use, store, or dispose of perchlorate-containing materials.
RADIOLOGICAL - pCi/l Analyzed 4 consecutive quarters every 4 years (results are from 2004 to 2007) (b)							
Gross Alpha (c)	0.27	ND-0.91	ND	ND-7.2	15 (d)	0	Erosion of natural deposits
Gross Beta	NA	NA	ND	ND-6.4	50 (d)	0	Decay of natural and man-made deposits
Uranium	NA	NA	0.5	ND-1.9	20 (d)	0.5 (a)	Erosion of natural deposits

PRIMARY STANDARDS MONITORED IN THE DISTRIBUTION SYSTEM - MANDATED FOR PUBLIC HEALTH

MICROBIALS	DISTRIBUTION SYSTEM		PRIMARY	MCLG	
	AVERAGE % POSITIVE	RANGE % POSITIVE	MCL	or PHG	
Total Coliform Bacteria	0%	0-1.8%	5%	0%	Naturally present in the environment
Fecal Coliform and *E.Coli* Bacteria	0%	0%	0%	0%	Human and animal fecal waste
No. of Acute Violations	0	0	-	-	

DISINFECTION BY-PRODUCTS (f)	DISTRIBUTION SYSTEM		PRIMARY	MCLG	
	AVERAGE	RANGE	MCL	or PHG	
Chlorine/chloramine Residual (mg/l)	2	0.2-3.4	4.0 (g)	4.0 (h)	Drinking water disinfectant added for treatment
Trihalomethanes-TTHMS (µg/l)	42	**13-90**	80	-	By-product of drinking water chlorination
Haloacetic Acids (µg/l)	15	5.9-50	60	-	By-product of drinking water chlorination
Bromate (µg/l)	6.3	3.4-10	10	-	By-product of drinking water chlorination

AT THE TAP PHYSICAL CONSTITUENTS 50 SITES SAMPLED IN 2005	DISTRIBUTION SYSTEM		PRIMARY	MCLG	
	90%ile	# OF SITES ABOVE THE AL	MCL	or PHG	
Copper (mg/l)	0.67 (i)	2	1.3 AL	0.17(a)	Internal corrosion of household plumbing, erosion of natural deposits
Lead (µg/l)	8.1 (i)	3	15 AL	2 (a)	Internal corrosion of household plumbing, industrial manufacturer discharges

SECONDARY STANDARDS MONITORED AT THE SOURCE - FOR AESTHETIC PURPOSES

Sampled from 2006 to 2007

	GROUNDWATER		MWD'S SURFACE WATER		SECONDARY	MCLG	
	AVERAGE	RANGE	AVERAGE	RANGE	MCL	or PHG	
Aggressiveness Index (corrosivity)	12	12	12.1	11.9-12.2	Non-corrosive	-	Natural/industrially-influenced balance of hydrogen/carbon/oxygen in water
Aluminum (µg/l) (j)	ND	ND	0.08	ND-0.14	200	600 (a)	Erosion of natural deposits, surface water treatment process residue
Chloride (mg/l)	33	30-36	78	40-101	500	-	Runoff/leachiing from natural deposits, seawater influence
Color (color units)	<1	<1	2	1-2	15	-	Naturally-occurring organic materials
Conductivity (umhos/cm)	745	570-920	676	414-893	1,600	-	Substances that form ions when in water, seawater influence
Copper (mg/l) (j)	ND	ND	ND	ND	1	0.17(a)	Internal corrosion of household plumbing systems; erosion of natural deposits leaching from wood preservatives
Foaming Agents (µg/l)	ND	ND	ND	ND	500	-	Municipal and industrial waste discharges
Iron (µg/l)	394	**ND-1500(k)**	ND	ND	300	-	Leaching from natural deposits, industrial wastes
Manganese (µg/l)	110	**36-340(k)**	ND	ND	50	-	Leaching from natural deposits
MTBE (µg/l) (j)	ND	ND	ND	ND	5	13(a)	Leaking underground storage tanks, petroleum/chemical factory discharges
Odor (threshold odor number)	<1	<1	1.7	1-2	3	-	Naturally-occurring organic materials
Sulfate (mg/l)	2.7	0.7-4.7	117	46-179	500	-	Runoff/leachiing from natural deposits, industrial wastes
Total Dissolved Solids (mg/l)	430	320-540	391	248-519	1,000	-	Runoff/leachiing from natural deposits
Turbidity (NTU)	<0.1	<0.1	0.05	0.03-0.07	5	-	Soil runoff

SECONDARY STANDARDS MONITORED IN THE DISTRIBUTION SYSTEM - FOR AESTHETIC PURPOSES

GENERAL PHYSICAL CONSITIUENTS	DISTRIBUTION SYSTEM		SECONDARY	MCLG	
	AVERAGE	RANGE	MCL	or PHG	
Color (color units)	4	1-11	15	-	Naturally-occurring organic materials
Odor (threshold odor number)	0	0-1	3	-	Naturally-occurring organic materials

ADDITIONAL CHEMICALS OF INTEREST

Sampled from 2006 to 2007

	GROUNDWATER		SURFACE WATER	
	AVERAGE	RANGE	AVERAGE	RANGE
Alkalinity (mg/l)	335.0	240-430	88	76-97
Boron (µg/l)	NA	NA	157	130-200
Calcium (mg/l)	37	32-47	37	23-55
Hexavalent chromium (µg/l)	NA	NA	0.12	0.06-0.22
Magnesium (mg/l)	13.5	13-14	17	11-23
N-Nitrosodimethylamine (ng/l)	NA	NA	-	ND-0.3
pH (standard unit)	7.9	7.8-7.9	8.2	8.1-8.4
Potassium (mg/l)	9.2	6.4-12	3.4	2.5-4.3
Sodium (mg/l)	106	62-150	71	40-93
Total Hardness (mg/l)	145	130-160	165	108-228
Total Organic Carbon (mg/l)	NA	NA	2.2	1.5-2.9
Vanadium (µg/l)	NA	NA	3.2	ND-4.1

FOOTNOTES

(a) California Public Health Goal (PHG). Other advisory levels listed in this column are federal Maximum Containment Level Goals (MCLGs).

(b) Indicates dates sampled for groundwater sources only.

(c) Gross alpha standard also includes Radium-226 standard.

(d) MCL compliance based on 4 consecutive quarters of sampling.

(e) MCL standard is for combined Radium 226 plus 228.

(f) Running annual average used to calculate average, range, and MCL, compliance.

(g) Maximum Residual Disinfectant Level (MRDL).

(h) Maximum Residual Disinfectant Level Goal (MRDLG).

(i) 90th percentile from the most recent sampling at selected customer taps.

(j) Aluminum, copper, MTBE, and thiobencarb have primary and secondary standards.

(k) The secondary MCLs for iron and manganese were exceeded in 2 wells in 2007. Iron and manganese MCLs are set to protect against unpleasant affects such as color, taste, odor, and staining of laundry and plumbing fixtures. An iron or manganese MCL exceedance does not pose a health risk.

(l) A single Trihalomethane result exceeded the primary MCL in 2007. Some people who drink water containing trihalomethanes in excess of the MCL over many years may experience liver, kidney, or central nervous system problems, and may have an increased risk of getting cancer.

ABBREVIATIONS

< = less than **mg/l** = milligrams per liter or parts per million (equivalent to 1 drop in 42 gallons) **NTU** = nephelometric turbidity units **NA** = constituent not analyzed **pCi/l** = picoCuries per liter
ng/l = nanograms per liter or parts per trillion (equivalent to 1 drop in 42,000 gallons) **ND** = constituent not detected at the reporting limit **SI** = saturation index **umhos/cm** = micromhos per centimeter
µg/l = micrograms per liter or parts per billion (equivalent to 1 drop in 42,000 gallons)

DEFINITIONS

Maximum Contaminant Level (MCL): The highest level of a contaminant that is allowed in drinking water. Primary MCLs are set as close to the PHGs (or MCLGs) as is economically and technologically feasible. Secondary MCLs are set to protect the odor, taste and appearance of drinking water.

Maximum Contaminant Level Goal (MCLG): The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs are set by the U.S. Environmental Protection Agency.

Maximum Residual Disinfectant Level (MRDL): The level of a disinfectant added for water treatment that may not be exceeded at the consumer's tap.

Maximum Residual Disinfectant Level Goal (MRDLG): The level of a disinfectant added for water treatment below which there is no known or expected risk to health. MRDLs are set by the U.S. Environmental Protection Agency.

Public Health Goal (PHG): The level of a contaminant in drinking water below which there is no known or expected risk to health. PHGs are set by the California Environmental Protection Agency.

Treatment Technique (TT): A required process intended to reduce the level of a contaminant in drinking water.

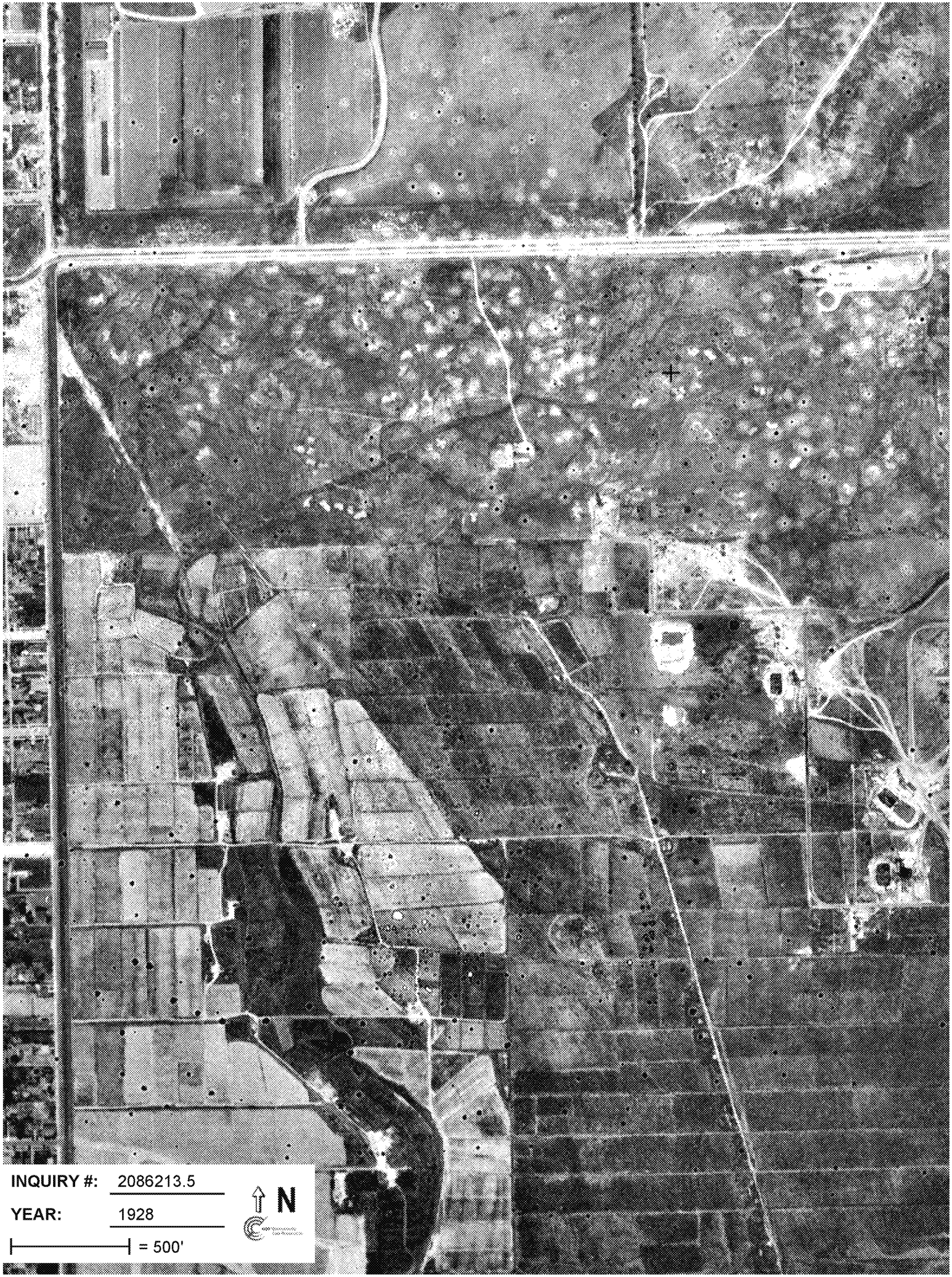
Regulatory Action Level (AL): The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.

Primary Drinking Water Standard (PDWS): MCLs and MRDLs for contaminants that affect health along with their monitoring and reporting requirements, and water treatment requirements.

1928 Aerial Photograph from the Fairchild Collection

Additional Technical Information
Hollywood Park, Inglewood, California

3 October 2008
(EKI A50015.01)

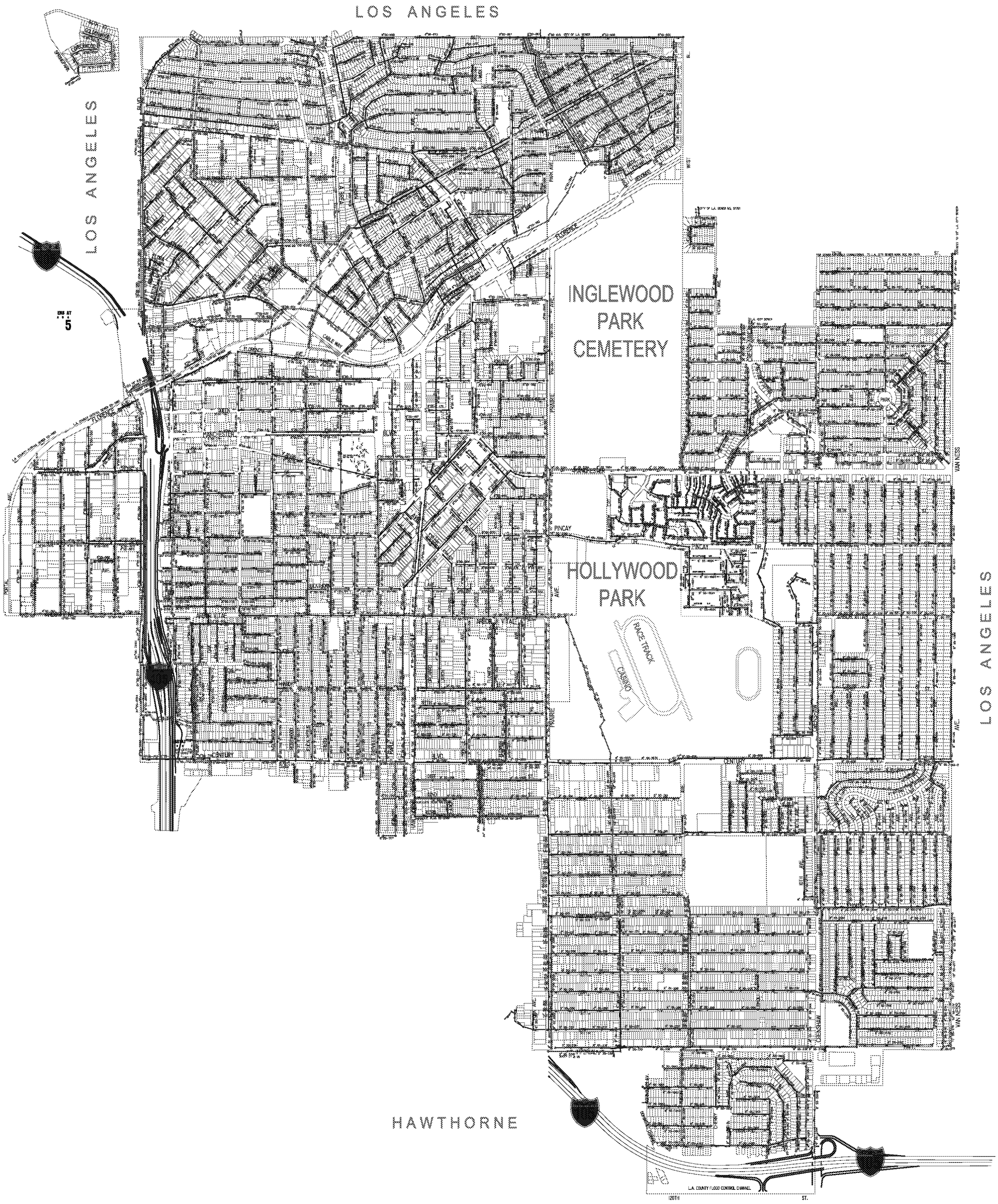

INQUIRY #: 2086213.5
YEAR: 1928
= 500'
N

Information Obtained from the United States Environmental Protection Agency Toxics Release Inventory Explorer website, http://www.epa.gov/triexplorer, Accessed 7 September 2008

Sites listed in the United States Environmental Protection Agency Toxic Release Inventory ("TRI") Explorer for Los Angeles County, California for use of nitric acid, ammonia, and nitrate compounds during 2006

Sites listed in the United States Environmental Protection Agency Toxic Release Inventory ("TRI") Explorer near the City of Inglewood, California for use of nitric acid, ammonia, and nitrate compounds during 2006

City of Inglewood Sewer Index



Source: City of Inglewood, March 2006.
Date: April 6, 2006

EIP ASSOCIATES A Division of PBSJ

Figure 3.2-1

National Space and Missile Systems Location

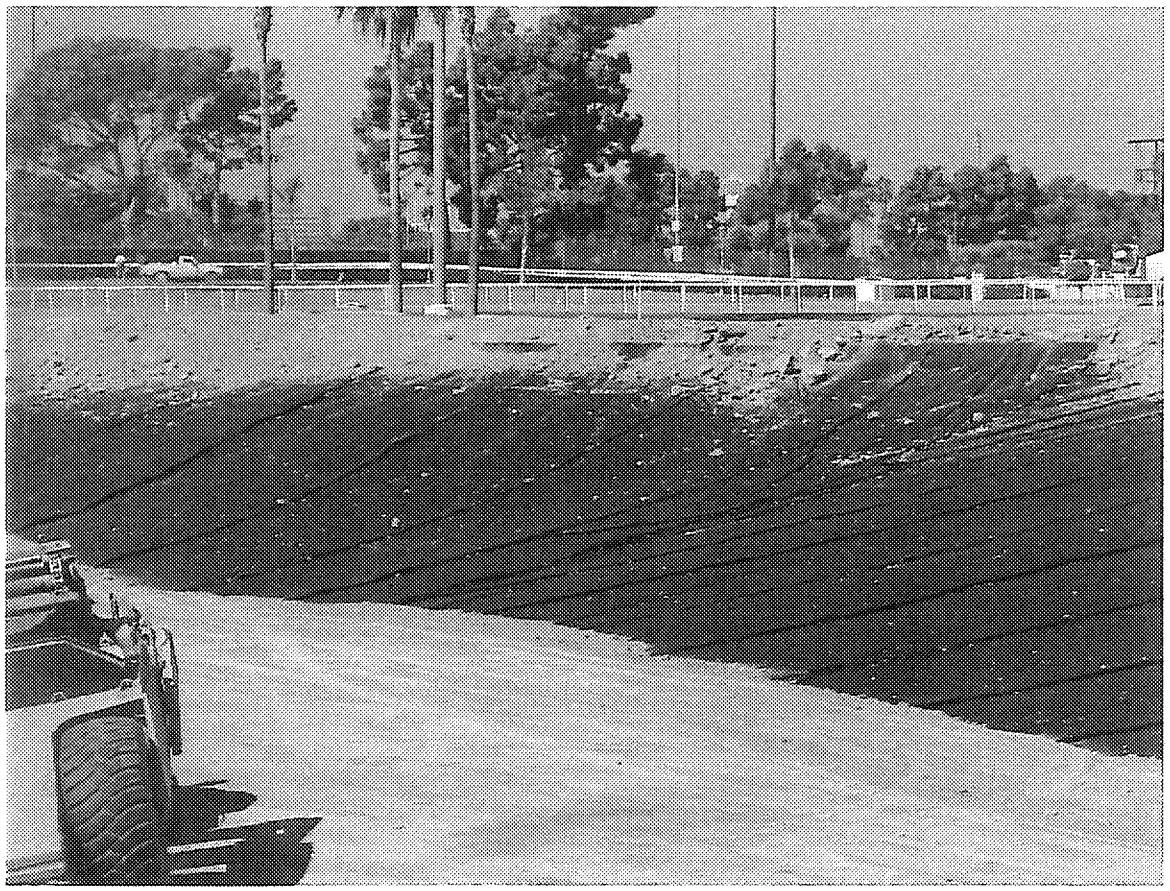
Additional Technical Information
Hollywood Park, Inglewood, California

3 October 2008
(EKI A50015.01)

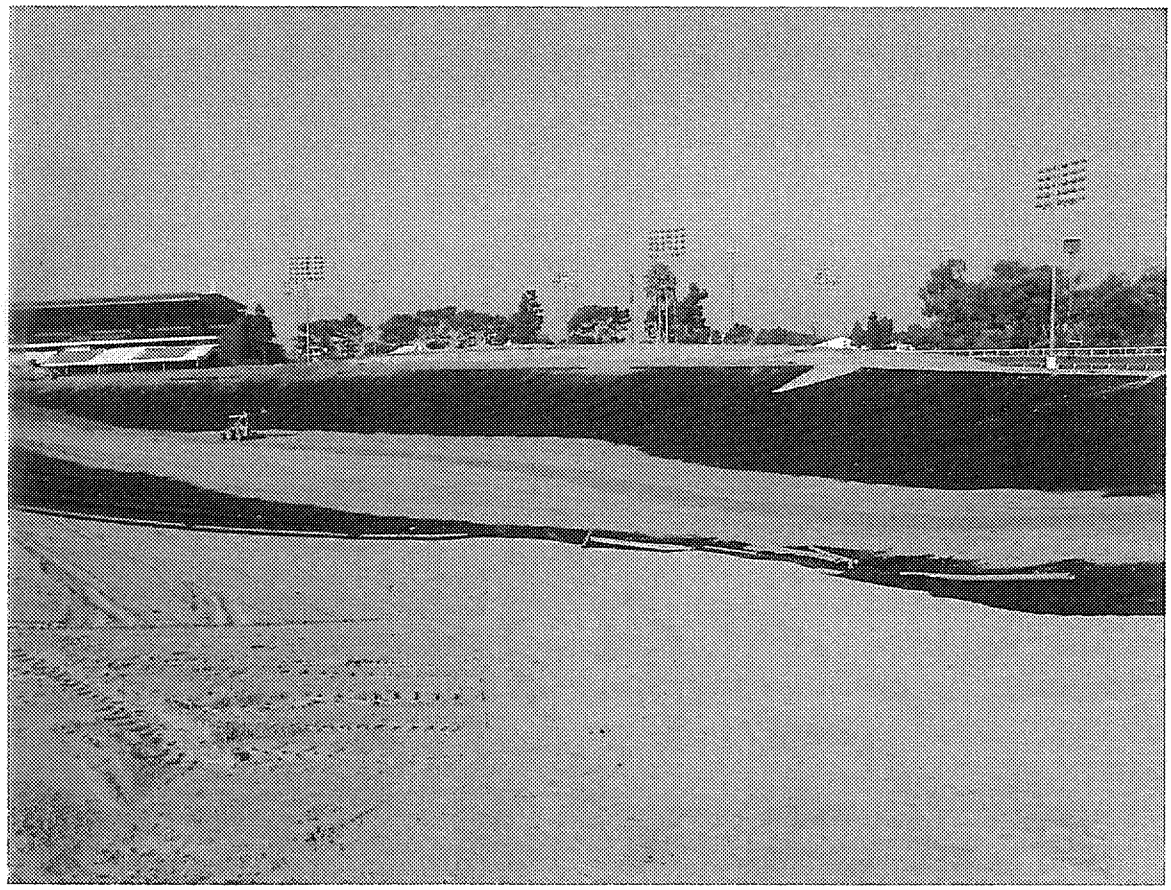
National Space and Missile Systems Program Location

Photographs of Construction of the North Pond Liner in the Infield of the Main Track, September 2000

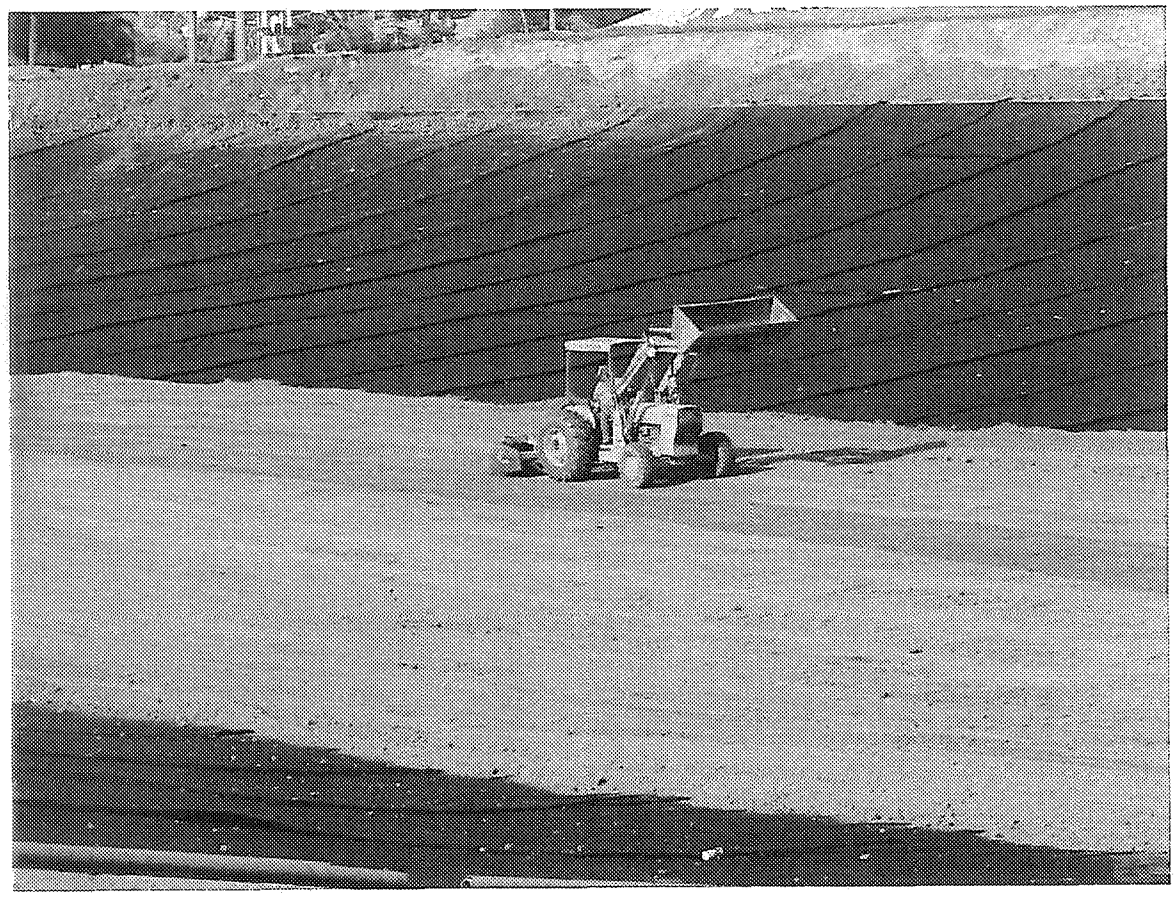
Placement of 24 inch misc. soil cover over the geotextile lining on 9/7/00.



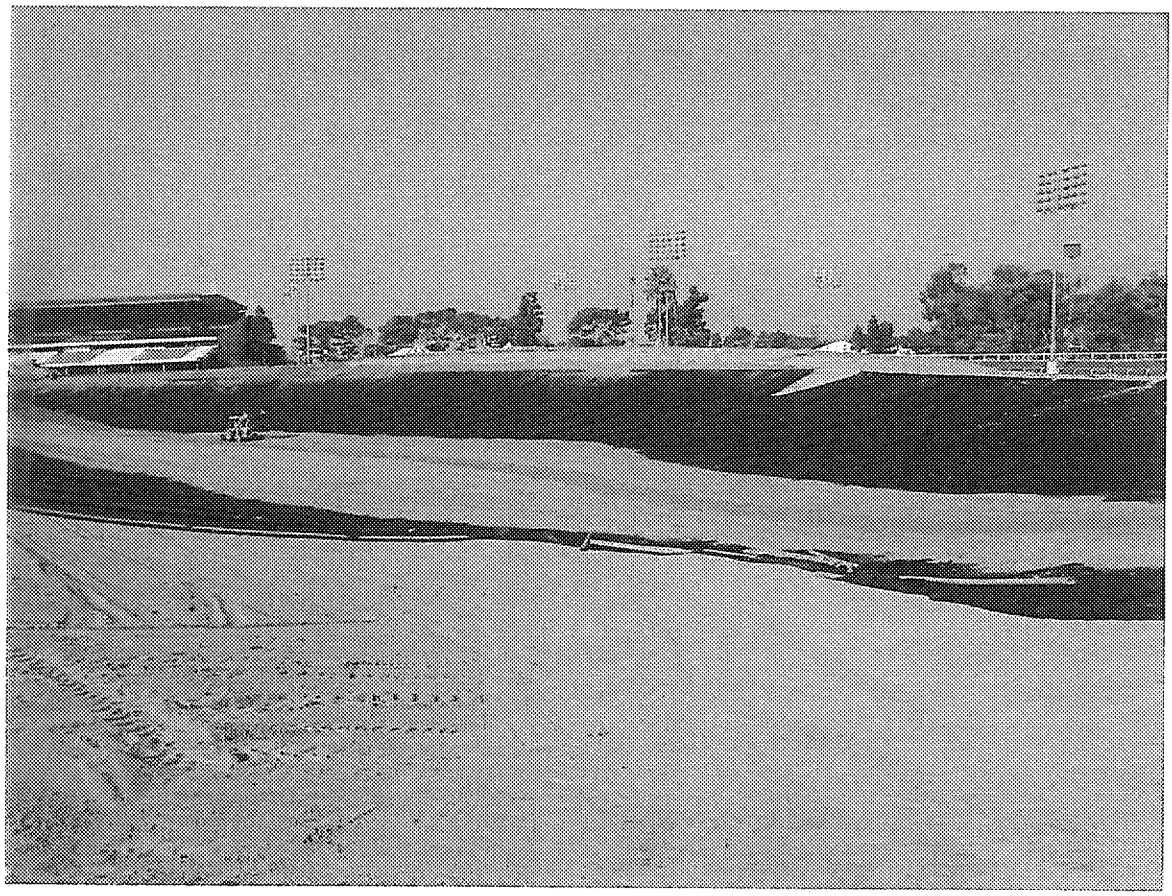
Placement of soil cover over geotextile fabric on 9/8/00.



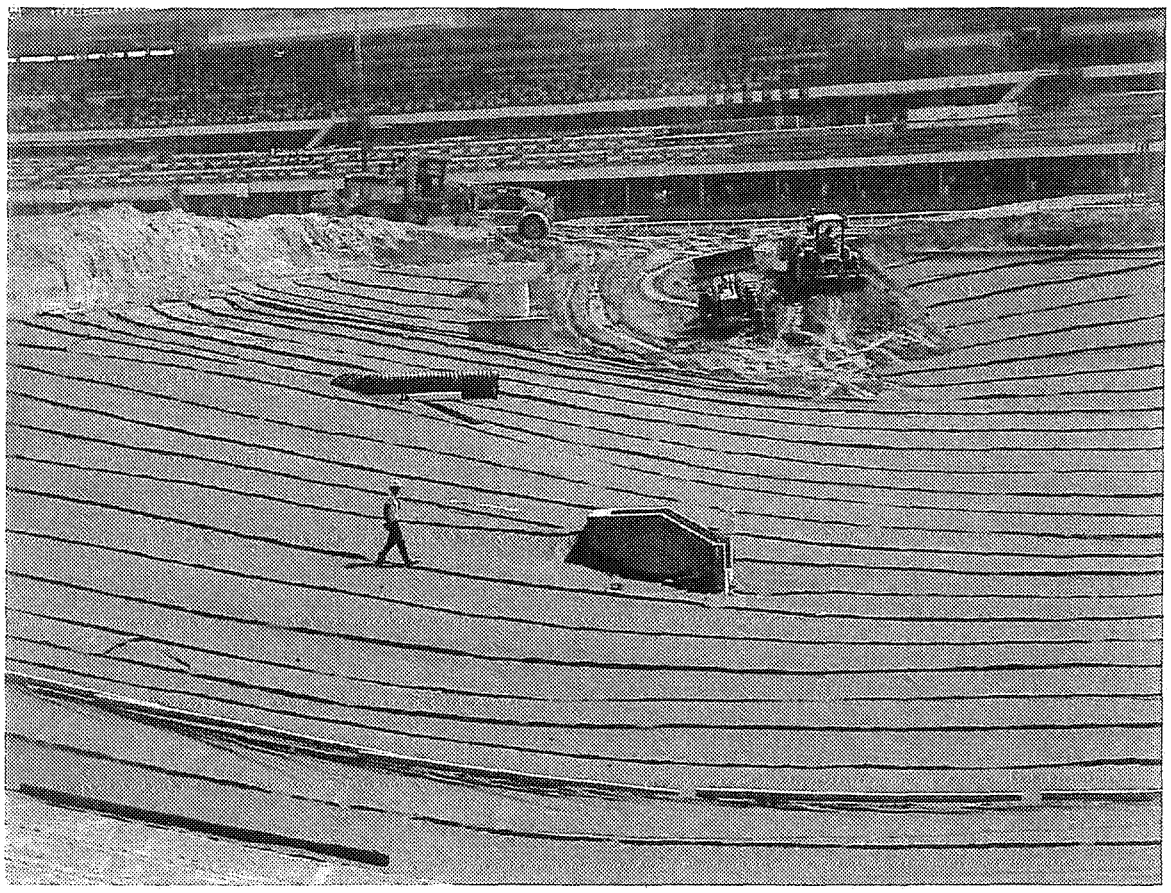
Placement of 24 inch soil cover over the geotextile fabric on 9/8/00.



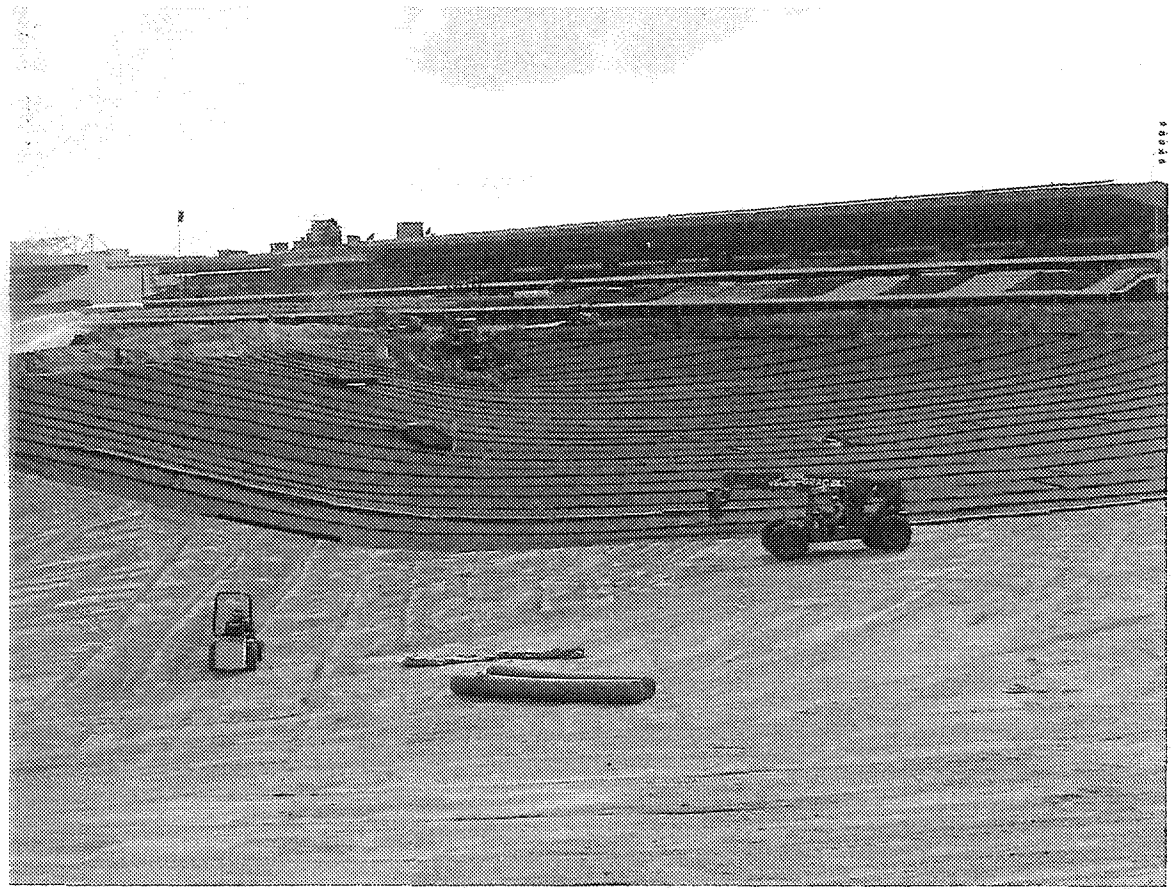
Placement of 24 inch soil cover over geotextile fabric on 9/8/00.



Placement of 24 inch soil cover over the geotextile fabric on 9/8/00.



Installation of geotextile fabric over geosynthetic liner and 6 inch soil cover on 9/7/00.



Placement of the geotextile fabric over geosynthetic liner and 6 inch soil cover on 9/7/00.

APPENDIX B

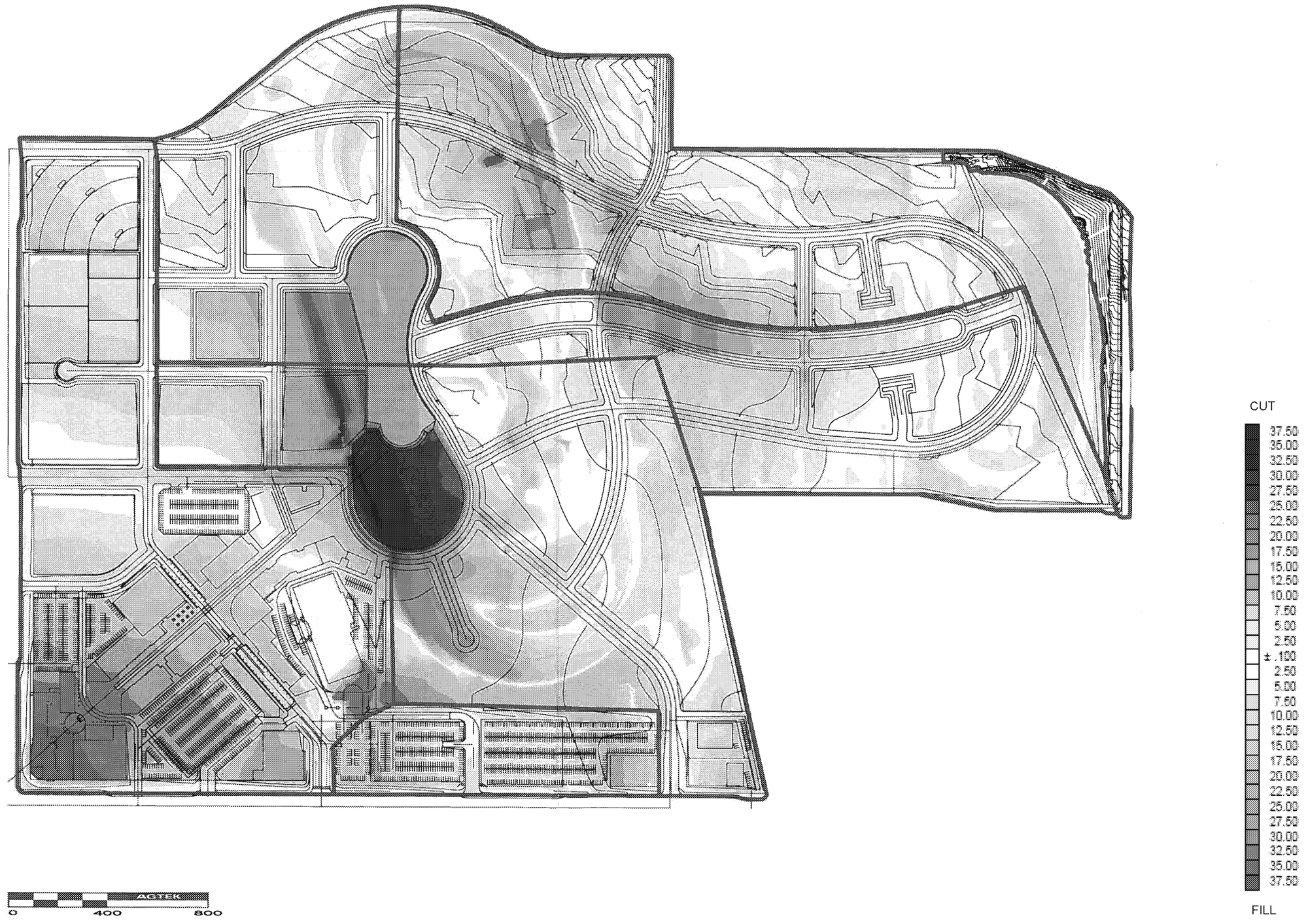
Technical Information Related to Additional Soil Sampling Requested by RWQCB

Hollywood Park Overexcavation Figure

REMOVAL DEPTHS FROM EXISTING GROUND

WILSON - MEANY - SULLIVAN HOLLYWOOD PARK	REMEDIAL ROMOVAL DEPTHS COLOR MAP WITH DESIGN OVERLAY	GPS Precision Grade 17150 VIA DEL CAMPO, SUITE 102 SAN DIEGO, CA 92127 (951) 906-7067	SHEET 1 OF 1 DRAWN BY: M.PALHEGYI September 10, 2008

Hollywood Park Mass Grading Figures


CUT
37.50
35.00
32.50
30.00
27.50
25.00
22.50
20.00
17.50
15.00
12.50
10.00
7.50
5.00
2.50
± .100
2.50
5.00
7.50
10.00
12.50
15.00
17.50
20.00
22.50
25.00
27.50
30.00
32.50
35.00
37.50
FILL
AGTEK
0
400
800

Photographs of the Hollywood Park Racetrack and Casino Main Track Infield

Photo 1: Main Track infield from the Grandstand Building looking northeast, 13 June 2005

Photo 2: Main Track infield from the Grandstand Building looking east, 13 June 2005

Aerial Photograph of the Main Track Infield from Google Earth, dated 31 July 2007

Main Track Infield

Borehole Log for PS-GW-5
from the *Property Wide Subsurface Investigation Report and Soil Vapor Extraction Workplan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California*, Erler & Kalinowski, Inc., 30 October 2006

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

BOREHOLE LOCATION	1050 S. Prairie Avenue, Inglewood, CA	BOREHOLE / WELL NAME	**PSGW-5**
DRILLING COMPANY	West Hazmat Drilling, C-57 Lic. # 819548	PROJECT NAME	**Hollywood Park**
DRILLING METHOD	Hollow-Stem Auger	PROJECT NUMBER	**EKI A50015.00**
CONDUCTOR CASING	NA; DIAMETER (inches); FROM (feet) TO	DATE STARTED	7/1/05; DATE COMPLETED 7/1/05
BLANK CASING	NA; DIAMETER (inches); FROM (feet) TO	BOREHOLE DIAM (inches)	2.0; TOTAL DEPTH (feet) 180.5
PERFORATED CASING	NA; DIAMETER (inches); FROM (feet) TO	DATUM	mean sea level NGVD 1988
GROUT	neat cement with 5% bentonite; FROM (feet) 0.0 TO 180.5	TOP OF CASING	GROUND SURFACE 149.1
SEAL	NA; FROM (feet) TO	LOGGED BY	Craig Hebert
FILTER PACK	NA; FROM (feet) TO	CHECKED BY	Carey E. Peabody, RG #5018

REMARKS: Auger was retracted to 177.5 feet bgs after reaching maximum depth and bailer was lowered to collect groundwater sample. Water level was taken approximately one hour after end of drilling.

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
							SILTY SAND WITH GRAVEL; Dark yellowish brown [10YR 4/6]; fill; 65-70% fine to coarse sand, 20% silt, 5-10% fine gravel; no odor; slightly moist, trace black organic matter.	SM		
						2				
						4				
			0.5	7	4.2					
			0.5	7						
			0.5	10						
						6				
						8				
			0.5	8	2.6	10	SANDY SILT; Yellowish brown [10YR 5/4]; 55-60% silt, 40-45% fine sand (trace medium), some clay; moderately hard, non-plastic, slighty moist, some MnOx staining.	ML		
			0.5	10						
			0.5	13						
						12				
						14				
			0.5	8			SILTY SAND; Dark yellowish brown [10YR 4/4]; 85% fine to medium sand (mostly fine), 15% silt; no odor; loose, slightly moist.	SM		
			0.5	10	1.3					
			0.5	12		16				
						18				
			0.5	19	3.9					

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	EKI A50015.00	BOREHOLE / WELL NAME	PSGW-5

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
			0.5 0.5	21 27			SAND; Light yellowish brown [10YR 6/4]; fine sand; no odor; loose, dry, scattered silty lens (1-2 cm).	SP		
						22				
						24				
						26				
						28				
			0.5 0.5 0.5	10 10 11	3.2	30	SAND; Yellowish brown [10YR 5/4]; 95% very fine micaceous sand, 5% silt; no odor; slightly moist.	SP		
						32				
						34				
						36				
						38				
			0.5 0.5 0.5	13 14 16	4.1	40	SAND; no odor; As above with trace fines, less moisture.	SP		
						42				
						44				
						46				
						48				
			0.5 0.5 0.5	13 15 18		50	SILTY SAND; Brown [10YR 4/3]; 50-60% very fine micaceous sand, 40-50% silt (trace fines); no odor; loose, moist, some MnOx staining.	SM		

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	EKI A50015.00	BOREHOLE / WELL NAME	PSGW-5

SAMPLES							MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)				
							SILTY SAND; Brown [10YR 4/3]; 50-60% very fine micaceous sand, 40-50% silt (trace fines); no odor; loose, moist, some MnOx staining.	SM		
						54				
						56				
						58				
			0.5	18		60	SAND; Light brownish gray [2.5Y 6/2]; fine sand; no odor; trace moisture, little to no fines, heavy FeOx staining.	SP		
			0.5	21						
			0.5	45						
						62				
						64				
						66				
						68				
			0.5	14		70	SILTY SAND; Light olive brown [2.5Y 5/3]; 80-85% fine to medium sand, 15-20% silt; no odor; slightly moist.	SM		
			0.5	15						
			0.5	18			SAND; Light yellowish brown [2.5Y 6/3]; 100% fine to coarse sand; no odor; trace moisture, little to no fines, scattered FeOx staining.	SP		
						72				
						74				
						76				
						78				
			0.5	30	0.7	80	SAND; Strong brown [7.5YR 5/6]; 95% fine to coarse sand, 5% fine gravel; no odor; slightly moist, heavily oxidized, 2 0.5-cm beds of of gray sand almost 90 degree dip in core.	SW		
			0.5	50						
						82				

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	EKI A50015.00	BOREHOLE / WELL NAME	PSGW-5

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
							SAND; Strong brown [7.5YR 5/6]; 95% fine to coarse sand, 5% fine gravel; no odor; slightly moist, heavily oxidized, 2 0.5-cm beds of of gray sand almost 90 degree dip in core.	SW		
						86				
						88				
			0.5	50	4.8	90	SAND WITH GRAVEL; Yellowish brown [10YR 5/8]; 80% fine to coarse sand, 20% fine to medium sub-rounded gravel; no odor; slightly moist, heavily oxidized.	SW		
						92				
						94				
						96				
						98				
			0.5 0.5 0.5	22 33 50	0.8	100	SANDY CLAY; Grayish brown [2.5Y 5/2]; 80-85% clay, 15-20% fine sand, some silt; no odor; hard, low plasticity, slightly sticky, moist, trace yellowish mottling.	CL		
						102				
						104				
						106				
						108				
			0.5 0.5	43 50	2.2	110	SAND; Light brownish gray [2.5Y 6/2]; fine sand, trace fines; no odor; trace moisture, scattered lenses with 5-10% silt.	SP		
						112				
						114				

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	EKI A50015.00	BOREHOLE / WELL NAME	PSGW-5

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
						118	SAND; Light brownish gray [2.5Y 6/2]; fine sand, trace fines; no odor; trace moisture, scattered lenses with 5-10% silt.	SP		
			0.5 0.5	25 50	5.3	120	CLAYEY SAND; Dark grayish brown [2.5Y 4/2]; 80-95% fine to coarse sand, 5-20% clay; no odor; slightly moist, less clay with depth, moderately hard, loose with depth, scattered FeOx staining, transistion into sand at 130 feet.	SC		
						122				
						124				
						126				
						128				
			0.5	50	4.6	130	SAND; Grayish brown [2.5Y 5/2]; 100% fine to coarse sand, trace fines; no odor; slightly moist, scattered fine rounded gravel, scattered FeOx staining.	SW		
						132				
						134				
						136				
						138				
			0.5 0.5	30 50		140	SAND; as above with 5-10% silt at 139.5-140, bedded 1-2 mm laminations.	SW		
						142				
						144				
						146				

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	EKI A50015.00	BOREHOLE / WELL NAME	PSGW-5

SAMPLES							MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)				
							SAND; as above with 5-10% silt at 139.5-140, bedded 1-2 mm laminations.	SW		
			0.5	50	1.2	150	SAND; Dark gray [2.5Y 4/1]; fine sand, trace fines; no odor; slightly moist, 1-2 cm intervals of lighter gray medium sand, partially consolidated.	SP		
						152				
						154				
						156				
						158				
			0.5 0.5	45 50	5.1	160	SAND; Gray [5Y 5/1]; fine to medium sand; no odor; loose, slightly moist, color almost Gley 2 range.	SP		
						162				
						164				
						166				
						168				
			0.5	50		170	SAND; very moist, as above with scattered lenses of 5-10% fines.	SW		
						172	7/1/05 ▼			
						174				
						176				
						178				
			0.5	22			7/1/05 ▽	SW		

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	EKI A50015.00	BOREHOLE / WELL NAME	PSGW-5

SAMPLES							MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)				
			0.5	50			SAND; as above with trace fines, wet at 179.5 feet in sampler, some scattered coarse sand grains (green).			
							Total Depth of Borehole = 180.5 feet.			
						182				
						184				
						186				
						188				
						190				
						192				
						194				
						196				
						198				
						200				
						202				
						204				
						206				
						208				
						210				

APPENDIX C

Technical Information Related to Vapor Intrusion Investigations Requested by RWQCB

Photographs of the Current Vehicle Maintenance Area

Photo 1: Current Vehicle Maintenance Area, looking north, 27 June 2005

Photographs of the Former Track Maintenance Area

Photo 1: Former Track Maintenance Area looking north, 27 June 2005

Photo 2: Former Track Maintenance Area looking east, 21 August 2008

Photo 3: Former Track Maintenance Area looking west, 6 July 2005

APPENDIX D

Technical Information Related to the Former Dry Cleaning Area

Photographs of the Former Dry Cleaning Area

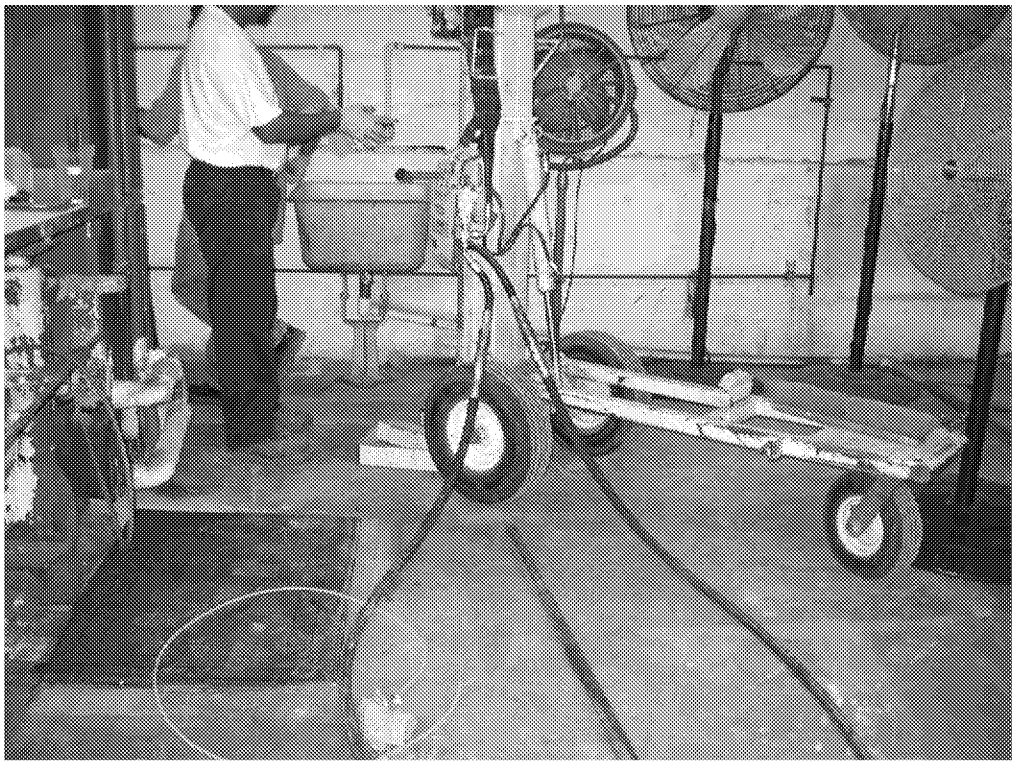


Photo 1: Drilling inside the Former Dry Cleaning Area, looking west, 12 July 2005

Photo 2: Outside the Former Dry Cleaning Area, looking southeast, 2 June 2007

Photo 3: Drilling of borehole PS-GW-1 outside the Former Dry Cleaning Area, looking southeast, 27 June 2005

Photo 4: Outside the Former Dry Cleaning Area, looking south, 13 June 2005

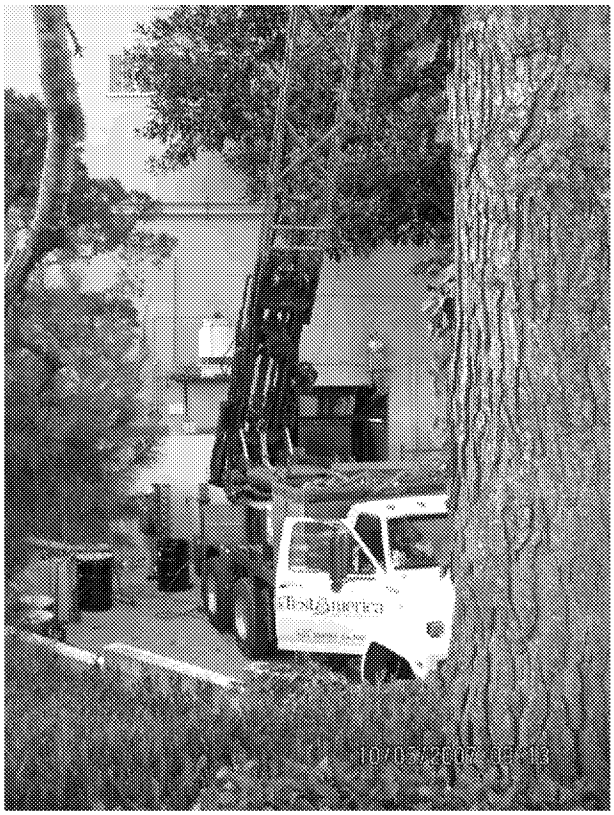
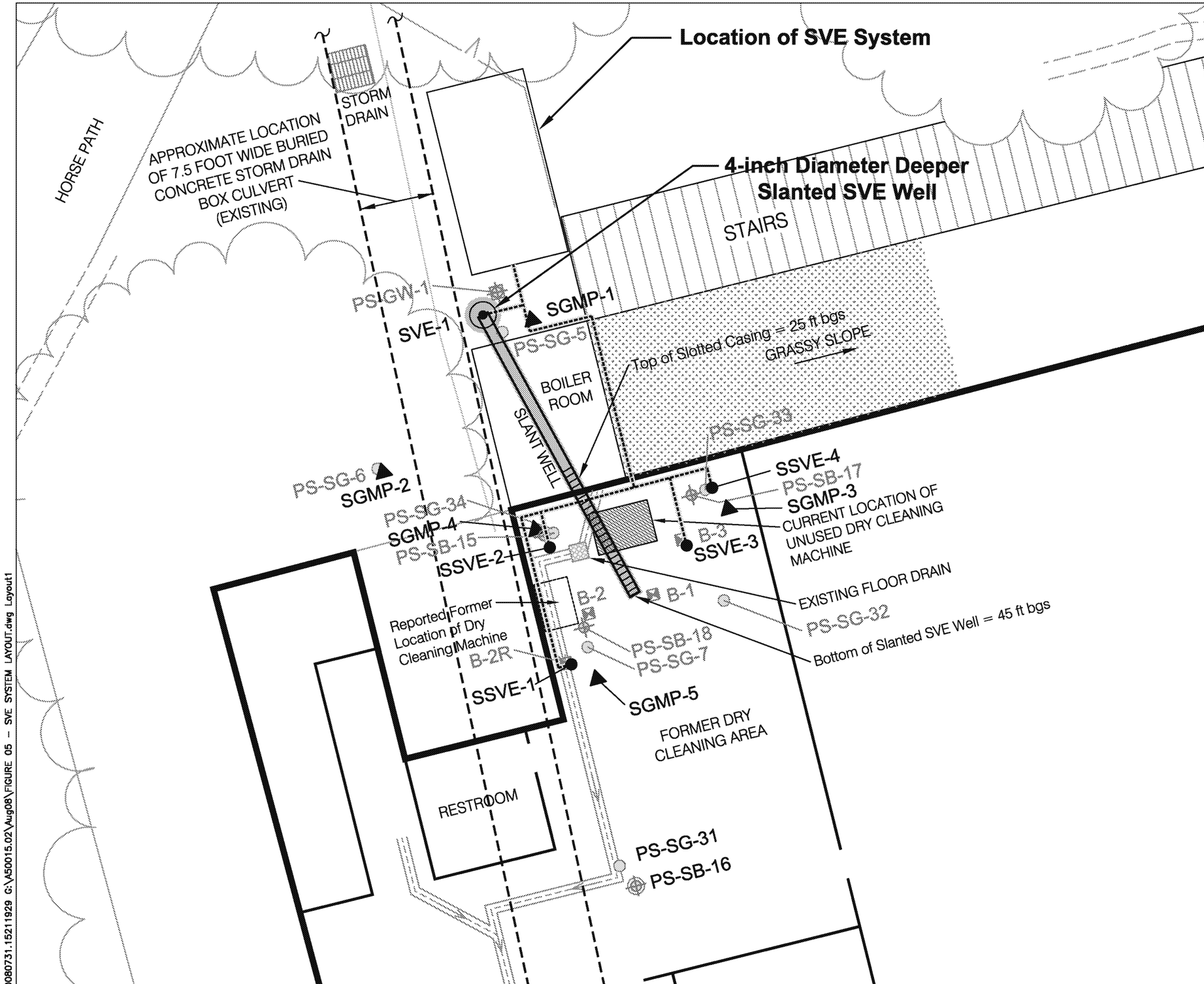


Photo 5: Drilling of borehole for SVE-1 outside the Former Dry Cleaning Area, looking south, 5 October 2007

Photo 6: SVE system installed outside the Former Dry Cleaning Area, looking south, 7 December 2008

Figure 5 from the *2nd Quarter 2008 Progress Report: Soil Vapor Extraction System at the Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California*, Erler & Kalinowski, Inc., 14 August 2008



N

0 10 20

(Approximate Scale in Feet)

Legend:

- 1-Inch Diameter Shallow SVE Well
- 4-Inch Diameter Deeper Slanted SVE Well
- Soil Gas Monitoring Probe
- Soil/Grab Groundwater Sampling Location (EKI, 2005)
- Soil Gas Sample Location (EKI, 2005)
- Soil Sample Location (EKI, 2005)
- Soil Gas/Soil Sampling Location
- Prior Soil Borehole and Soil Sample Location (Dames & Moore, 1999)
- Aboveground SVE Conveyance Pipe
- Utility Trench Location (Saw Cut Concrete) (Existing)
- Exterior Wall

Abbreviations:

bgs = below ground surface

Notes:

1. All locations are approximate.
2. Basemap source: Approximate field measurements.
3. Sampling locations surveyed by PSOMAS of West Los Angeles, 11-14 July 2005.
4. Locations of SVE wells and soil gas monitoring probes surveyed by Hall & Foreman, Inc., 23 October 2007.

Erler & Kalinowski, Inc.

Soil Vapor Extraction (SVE) System Layout

Hollywood Park
Inglewood, CA
August 2008
EKI A50015.02

Figure 5

20080731.15211929 G:\A50015.02\Aug08\FIGURE 05 – SVE SYSTEM LAYOUT.dwg Layout1

Borehole Log for PS-GW-1
from the *Property Wide Subsurface Investigation Report and Soil Vapor Extraction Workplan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California*, Erler & Kalinowski, Inc., 30 October 2006

Borehole Log for Soil Vapor Extraction Well SVE-1
from the *Startup Report: Soil Vapor Extraction System at Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California*, Erler & Kalinowski, Inc., 2 January 2008

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

BOREHOLE LOCATION	1050 South Prairie Avenue, Inglewood, California	BOREHOLE / WELL NAME	**PS-GW-1**
DRILLING COMPANY	West Hazmat Drilling, C-57 Lic. # 554979	PROJECT NAME	**Hollywood Park**
DRILLING METHOD	Hollow-Stem Auger	PROJECT NUMBER	**A50015.00**

CONDUCTOR CASING		DIAMETER (inches)	FROM (feet)	TO	DATE STARTED	6/27/05	DATE COMPLETED 6/27/05
BLANK CASING		DIAMETER (inches)	FROM (feet)	TO	BOREHOLE DIAM (inches)	8.8	TOTAL DEPTH (feet) 130.5
PERFORATED CASING		DIAMETER (inches)	FROM (feet)	TO	DATUM	mean sea level NGVD 1988	
GROUT	Neat cement with 5% bentonite		FROM (feet) 0.0	TO 130.5	TOP OF CASING		GROUND SURFACE 118.1
SEAL			FROM (feet)	TO	LOGGED BY	Craig Hebert	
FILTER PACK			FROM (feet)	TO	CHECKED BY	Carey E. Peabody, RG #5018	

REMARKS: Auger was retracted to 120 feet bgs after reaching maximum depth and a temporary two inch diameter well was installed into the borehole due to the potential for heaving sands. Well was screened from 120-130 feet bgs. Water level was taken approximately one hour after end of drilling.

SAMPLES									
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG / WELL CONSTRUCTION
							Concrete.		
			0.5			2	SILTY SAND; Dark yellowish brown [10YR 4/4]; fill; 70% fine sand, 30% silt; loose; dry to moist; no odor	FILL (SM)	
						4			
10:05	PSGW-1-5-5.5		0.5 0.5 0.5	5 6 7	3.4				
						6			
						8			
10:11	PSGW-1-10-10.5		0.5 0.5 0.5		2.6	10	SILTY SAND; Dark brown [10YR 3/3]; possibly fill; 80% fine to medium sand (mostly fine), 20% silt; loose; dry to moist; no odor	SM	
						12			
						14			
10:16	PSGW-1-15-15.5		0.5 0.5 0.5	8 9 12	3.2		SAND WITH SILT; Dark brown [7.5YR 4/4]; 90% fine to medium sand, 10% silt, trace clay; dry to moist; no odor; some small zones of FeOx staining.	SP-SM	
						16			
						18			
			0.5	7					

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	A50015.00	BOREHOLE / WELL NAME	PS-GW-1

SAMPLES							MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)				
10:21	PSGW-1-20-20.5		0.5 0.5	11 13	2.1		As above; slight increase in grain size; increase in FeOx staining. SAND WITH SILT; Dark brown [7.5YR 4/4]; 90% fine to medium sand, 10% silt, trace clay; dry to moist; no odor; some small zones of FeOx staining.	SP-SM		
						22				
						24				
						26				
						28				
10:28	PSGW-1-30-30.5		0.5 0.5 0.5	7 16 18	4.2	30	SILTY SAND; Brown [10YR 5/3]; 75% micaceous fine to medium sand, 25% silt; firm; dry to moist; no odor	SM		
						32				
						34				
						36				
						38				
10:35	PSGW-1-40-40.5		0.5 0.5 0.5	19 22 27	2.2	40	no odor; As above; sand is mostly fine, 30% silt; scattered MnOx nodules (<1mm diameter.).			
						42				
						44				
						46				
						48				
10:45	PSGW-1-50-50.5		0.5 0.5 0.5	13 18 25	2.1	50	SILTY SAND; Grayish brown [10YR 5/2]; 80% fine to medium sand, 20% silt (mostly silt with some clay); dry to moist; no odor; large MnOx nodules up to 5 cm diameter.	SM		

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	A50015.00	BOREHOLE / WELL NAME	PS-GW-1

SAMPLES							MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)				
							SILTY SAND; Grayish brown [10YR 5/2]; 80% fine to medium sand, 20% silt (mostly silt with some clay); dry to moist; no odor; large MnOx nodules up to 5 cm diameter.	SM		
						54				
						56				
						58				
			0.5 0.5 0.5	19 23 25	1.6	60	SAND; Gray [10YR 5/1]; 100 % fine to medium sand; loose to medium dense; dry to moist; no odor	SP		
						62				
						64				
						66				
						68				
			0.5 0.5	30 50	2.1	70	Light brownish gray [10YR 6/2]; trace fines; no odor; As above.			
						72				
						74				
						76				
						78				
			0.5 0.5	30 50	2.8	80	no odor; As above; slightly more coarse.			
						82				

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	A50015.00	BOREHOLE / WELL NAME	PS-GW-1

SAMPLES							MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)				
							SAND; Gray [10YR 5/1]; 100 % fine to medium sand; loose to medium dense; dry to moist; no odor	SP		
						86				
						88				
			0.5	50	2.6	90	SAND; Brown [7.5YR 5/3]; 95% fine to coarse sand, 5% fine subrounded gravel; loose; dry to moist; no odor; Approximately 5% subrounded gravel.	SP		
						92				
						94				
						96				
						98				
			0.5 0.5	23 50	1.4	100	SILTY SAND; Brown [7.5YR 5/3]; 85% fine to medium sand, 15% silt; dry to moist; no odor; heavy FeOx staining.	SM		
						102				
						104				
						106				
						108				
			0.5 0.5	30 50	1.3	110	SAND; Pale brown [10YR 6/3]; 90% fine to coarse sand, 10% fine to medium gravel (subrounded); barely moist; no odor	SW		
						112				
						114				

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	A50015.00	BOREHOLE / WELL NAME	PS-GW-1

SAMPLES							MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM (ppmv)	DEPTH (feet)				
							SAND; Pale brown [10YR 6/3]; 90% fine to coarse sand, 10% fine to medium gravel (subrounded); barely moist; no odor	SW		
						118				
			0.5	12		120	SAND; Yellowish brown [10YR 5/6]; 95% fine to coarse sand, 5% silt and clay with some 1-2 inch silty lens; moist to wet; no odor (6/27/2005)	SP		
			0.5	13						
			0.5	23						
						122				
						124				
						126				
						128				
			0.5	25		130	SAND WITH GRAVEL; Brown [7.5YR 5/3]; 80% fine to coarse sand, 20% subangular gravel (fine to coarse); wet; no odor; scattered 1-2 cm lenses of silty sand with up to 25% silt.	SW		
			0.5	50			Total Depth of Borehole = 130.5 feet.			
						132				
						134				
						136				
						138				
						140				
						142				
						144				
						146				

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

BOREHOLE LOCATION	1050 South Prarie Ave, Inglewood, CA				BOREHOLE / WELL NAME	SVE-1	
DRILLING COMPANY	TestAmerica Drilling Corp., C-57 Lic. # 819548				PROJECT NAME	Hollywood Park	
DRILLING METHOD	Hollow-Stem Auger				PROJECT NUMBER	A50015.02	
CONDUCTOR CASING	NA	DIAMETER (inches)	FROM (feet)	TO	DATE STARTED	10/5/07	DATE COMPLETED 10/5/07
BLANK CASING	Schedule 40 PVC	DIAMETER (inches) 4.00	FROM (feet) 0.0	TO 30.0	BOREHOLE DIAM (inches)	10.0	TOTAL DEPTH (feet) 55.5
PERFORATED CASING	0.020-inch Slotted Sch 40 PVC	DIAMETER (inches) 4.00	FROM (feet) 30.0	TO 55.0	DATUM		
GROUT	Bentonite grout		FROM (feet) 0.0	TO 24.0	TOP OF CASING	117.70	GROUND SURFACE
SEAL	#8 Hydrated Bentonite Chips		FROM (feet) 24.0	TO 26.0	LOGGED BY	Craig Hebert, PG #8426	
FILTER PACK	Medium Aquarium Sand		FROM (feet) 30.0	TO 55.0	CHECKED BY	Craig Hebert, PG #8426	

REMARKS: Borehole was drilled at a 35 degree angle, south-southeast and was logged and sampled as the total length of auger. Vertical depth of well is approximately 45 feet below ground surface.

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM / H2S (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
							Concrete to 6"			
						1	FILL (SAND WITH SILT); dark yellowish brown (10YR 4/6); 85% fine grained sand; 15% silt; moist; medium soft; sediment is similar to native soils typically encountered at shallow depths in this area (see below)	FILL (SM)		
						2				
						3				
08:19	SVE-1-3.5-4		0.5 0.25		0	4				
						5				
						6				
						7				
						8				
08:25	SVE-1-8.5-9		0.5 0.25		0	9	SILTY SAND; dark brown (10YR 3/3); 80% very fine to fine grained sand; 20% silt; moist; soft; somewhat micaceous; possibly fill but is similar to underlying native sediment	SM		

Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	A50015.02	BOREHOLE / WELL NAME	SVE-1

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM / H2S (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE
							SILTY SAND; dark brown (10YR 3/3); 80% very fine to fine grained sand; 20% silt; moist; soft; somewhat micaceous; possibly fill but is similar to underlying native sediment *(Continued)*	SM
						11	Metal debris in drill cuttings	
						12		
						13		
							SAND WITH SILT; dark yellowish brown (10YR 4/4); 85-90% fine grained sand; 10-15% silt; dry to moist; medium soft	SP-SM
			0.5			14		
			0.5					
08:36	SVE-1-14.5-15		0.5		0	15		
						16		
						17		
						18		
							SAND; light yellowish brown (2.5Y 6/3); >95% fine to coarse grained sand; <5% silt; <5% clay; mostly medium to fine sand; moist; medium soft	SW
			0.5			19		
			0.5					
08:49	SVE-1-19.5-20		0.5		0	20		
						21		
						22		
						23		
							Increase in coarse sand; scattered subrounded gravel	
			0.5			24		
			0.5					
08:59	SVE-1-24.5-25		0.5		0	25	CLAYEY SAND; dark yellowish brown (10YR 3/4); 80% fine to medium grained sand; 20% clay; moist; medium hard; distinct transition between SW and SC	SC

GRAPHIC LOG

WELL CONSTRUCTION

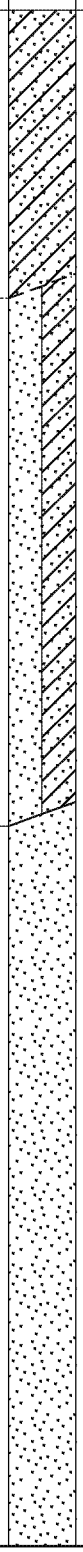
Borehole & Well Construction Log

Erler & Kalinowski, Inc.

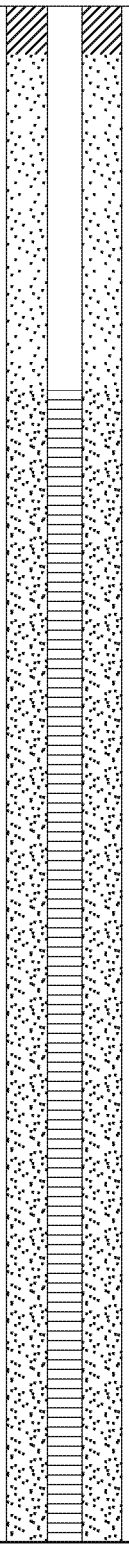
PROJECT NAME	Hollywood Park	PROJECT NUMBER	A50015.02	BOREHOLE / WELL NAME	SVE-1

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM / H2S (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE
							CLAYEY SAND; dark yellowish brown (10YR 3/4); 80% fine to medium grained sand; 20% clay; moist; medium hard; distinct transition between SW and SC *(Continued)*	SC
						27		
						28		
			0.5 0.5			29	SAND WITH CLAY; 95% fine to medium grained sand; 5% clay; moist; medium soft; heavy iron oxide staining	SP-SC
09:09	SVE-1-29.5-30		0.5		0	30		
						31		
						32		
						33		
							Very heavy iron oxide staining decreasing with depth	
			0.5 0.5			34		
09:21	SVE-1-34.5-35		0.5		0	35	SAND; light olive brown (2.5Y 5/3); 95% fine grained sand; <5% silt; <5% clay; trace clay; increasing to ~5% at 34.9 ft; moist; medium soft	SP
						36		
						37		
						38		
							light olive brown (2.5Y 5/4); ~100% fine grained sand; <5% silt; less fines with depth; moist; medium soft	
			0.5 0.5			39		
09:32	SVE-1-39.5-40		0.5		0	40		
						41		

GRAPHIC LOG



WELL CONSTRUCTION



Borehole & Well Construction Log

Erler & Kalinowski, Inc.

PROJECT NAME	Hollywood Park	PROJECT NUMBER	A50015.02	BOREHOLE / WELL NAME	SVE-1

SAMPLES: TIME COLLECTED	SAMPLE NAME	SAMPLE TYPE	RECOVERY (feet)	BLOW COUNT	OVM / H2S (ppmv)	DEPTH (feet)	MATERIAL DESCRIPTION AND DRILLING NOTES	USCS CODE	GRAPHIC LOG	WELL CONSTRUCTION
							SAND; light olive brown (2.5Y 5/3); 95% fine grained sand; <5% silt; <5% clay; trace clay; increasing to ~5% at 34.9 ft; moist; medium soft *(Continued)*	SP		
						43				
			0.5				yellowish brown (10YR 5/6); 100% very fine to fine grained sand; trace silt; moist; medium soft; micaceous; some FeO staining			
			0.5			44				
09:42	SVE-1-44.5-45		0.5		0					
						45				
						46				
						47				
						48				
							reddish brown(2.5YR 5/3)			
			0.5			49				
			0.5							
09:48	SVE-1-49.5-50		0.5		0					
						50				
						51				
						52				
						53				
							CLAYEY SAND; light olive brown (2.5Y 5/4); 75% fine grained sand; 25% clay; moist; medium hard	SC	
			0.5			54				
			0.5							
10:00	SVE-1-54.5-55		0.5		0					
						55				
							Total Depth of Borehole = 55.5 feet.			
						56				
						57				

Erler &
Kalinowski,
Inc.

Northern California
1870 Ogden Drive
Burlingame, CA 94010
Tel. (650) 292-9100
Fax (650) 552-9012

Southern California
35 North Lake Ave.
Suite 705
Pasadena, CA 91101
Tel. (626) 432-5900
Fax (626) 432-5905

Colorado
7600 E. Arapahoe Road
Suite 210
Centennial, CO 80112-1261
Tel. (303) 796-0556
Fax (303) 796-0546

www.ekiconsult.com