

*The Law Office of
Michael D. Bradbury*

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2244 East Ojai Avenue
Ojai, California 93023

February 27, 2015

Re: November 18, 2014 Incidents - Root Cause Investigatory Report

The following report is based on an internal investigation conducted by the Santa Clara Waste Water Company ("SCWW") regarding the above referenced incident, and is intended to be SCWW's response to inquiries from various regulatory, investigative and other governmental agencies having jurisdiction over or substantial interest in the matter. As more information is developed, this report will be updated and/or amended accordingly. The company's lawyers, Messrs. Barry Groveman and William Carter of the law firm Musick, Peeler and Garrett, LLC, are available to respond to any inquiries regarding this report to the extent possible, and can be contacted at the numbers and addresses listed below. As one of the principal investigators, acting under the direction of counsel for the company, any questions to me should be handled through Messrs. Groveman or Carter.

Please also be advised that a copy of this report was hand-delivered to the principal investigative agency handling this matter, namely, the Ventura County District Attorney's Office, on Tuesday, February 24, 2015.

INTRODUCTION:

Immediately after the explosion and subsequent fire that occurred on the premises of the Santa Clara Waste Water Company ("SCWW") facility located at 815 Mission Rock Road, Santa Paula, California (the "Facility") on November 18, 2014 (collectively referred to as the "Incidents"), an investigation was initiated by SCWW's legal counsel (the "Investigation"). This Investigation is ongoing, and is being conducted by legal counsel, with myself serving as the lead, with assistance provided by former state and federal environmental crimes prosecutors and law enforcement officers, and scientific and forensic experts knowledgeable in chemical, environmental, regulatory and public health and safety matters.

Since 1959, Santa Clara Waste Water Company has continually provided environmental and waste water services to Ventura County farmers, industry and government, as well as residents with septic systems and water softeners. In fact, well over 90% of Ventura County septic system owners bring their waste to SCWW for processing. In addition, the Facility, which only accepts non-hazardous petroleum, domestic sewage and industrial waste for processing, is highly-regulated and frequently-inspected and scrutinized by numerous local, state and federal agencies. SCWW also has a long history of environmental compliance and

934165.1

County of Ventura
Initial Study
PL15-0106

**Attachment 3 – February 27, 2015
SCWW Root Cause Investigative
Report**

work place safety. The November 18, 2014 incidents are the first such events at the Facility in the more than 50 years of SCWW operations. SCWW had no history of explosions, fires or any other type of accidents similar to those occurring on November 18, 2014.

The following analysis and conclusion is based upon information gathered during the course of this Investigation, including the review of available documentation and records, the examination of physical evidence and the sampling and laboratory analysis of materials obtained from the premises of the Facility after the Incidents. Although we cannot say with 100% certainty that we now know all the relevant facts, the following analysis constitutes our best understanding and belief regarding the Incidents, and will be used to address any possible regulatory, enforcement and/or legal issues that may arise as a result of the Incidents.¹

MOST LIKELY CAUSE OF THE EXPLOSION ON NOVEMBER 18, 2014:

Absent the discovery or receipt of any new information, the Investigation has reached the conclusion that the most likely cause of the explosion appears to be a chemical reaction resulting from the inadvertent mixing of non-hazardous domestic waste (i.e., septic and sewage) with sodium chlorite, which is a chemical treatment product commonly used in wastewater treatment systems and processes, including odor control and cleaning pipelines of bacteria that can generate hydrogen sulfide gas. This conclusion is based on the following analysis:

Although not a member of the site-controlling Incident Command ("IC"), which was comprised of USEPA, the County and Patriot, SCWW staff heard comments from various members of the IC suggesting that the possible cause of the explosion involved the treatment chemical "sodium chlorite." In response to these and other statements made by members of the IC, SCWW initiated a review of available records and confirmed that sodium chlorite, in liquid form, had been purchased by SCWW and delivered to the Facility by Miles Chemical in the late Summer of 2014 in a single 275-gallon, 2,825 pound plastic (and caged) shipping

¹ It should, however, be recognized and understood that between the date of the Incidents and January 9, 2015, the ability of SCWW to directly and thoroughly investigate and evaluate the nature and potential cause(s) of the Incidents was significantly hampered by the fact that SCWW had very little access to the premises of the Facility, which was initially under the control of an Incident Command ("IC"), then under the possession and control of either the County of Ventura or the United States Environmental Protection Agency ("USEPA"). At the time of the Incidents, the County initially assumed command of the Facility, which it subsequently relinquished to the USEPA. At that time, SCWW contracted with Patriot Environmental Services ("Patriot") to handle both the emergency response and the subsequent cleanup at the Facility. USEPA thereafter directed and oversaw all safety and cleanup activities on the premises of the Facility until January 9, 2015, when it completed its activities and relinquished control of the Facility back to SCWW, with regulatory oversight transferred to the County. Prior to the departure of the USEPA from the Facility on January 9, 2015, the materials involved in the Incidents had been safely and completely neutralized, solidified and/or disposed of under federal oversight. On January 9, 2015, SCWW was finally granted full access to and control the Facility. In addition to having very limited access to the premises of the Facility for nearly two months, many of the relevant records and materials relating to SCWW's operations at the Facility were either destroyed in the resulting fire on November 18, 2014 that consumed the on-site office and/or were seized by the Ventura County District Attorney's Office ("VCDA") as part of its ongoing investigation of the Incidents and related matters. As a consequence, the following analysis is based on information gathered during the course of SCWW's internal investigation, as well as learned through contacts and communications with various local, state and federal regulatory agencies, and will be supplemented as additional information and analysis is acquired. With that understanding and limitation, please find the following analysis.

and storage container known as a "tote."² Miles Chemical is a regular and long-time provider of chemical treatment products to SCWW, and also delivers non-hazardous wastewater contained in similar totes of various sizes for treatment at the Facility.

More specifically, the sodium chlorite, which was manufactured by DuPont and known by the brand name, "Headline 3875," was 31.25% active solution, with more than 5% available chlorine, and had a pH of 12.0. The Material Safety Data Sheet (MSDS) accompanying the tote of sodium chlorite provided, among other things, the following notices and warnings: "Fire and Explosion Hazard: Drying of this product on clothing or combustible materials may cause fire." . . . ; "Spill Cleanup: Dilute with water. Pick up and transfer to properly labelled containers. After cleaning, flush away traces with water." . . . ; "Handling: Avoid letting the product become dry." . . . ; "Incompatibility: Strong acids and oxidizing agents, Organic materials, chlorinated compounds, reducing agents;" . . . ; and "Hazardous reactions: Contact with acids, organic materials, reducing agents and oxidizing agents will release toxic gases of chlorine and/or chlorine dioxide."

The tote of sodium chlorite was delivered to the Facility as part of a proposed program designed and supplied by Miles Chemical to protect against odors, sulfides and biological oxygen demand ("BOD") residuals potentially developing in the 12-mile trunk line or pipeline ("pipeline") to the City of Oxnard's Wastewater Treatment Plant ("WWTP"). SCWW had requested that Miles Chemical supply such an odor control program that could be easily administered through manual controls. For example, as part of this proposed program, SCWW would provide the chemical feed pumps necessary to manually inject the sodium chlorite and other treatment products into the pipeline system. It was SCWW's understanding that Miles Chemical had been working closely with both the Naval Air Station at Point Mugu and the City of Oxnard on a similar program for several years. However, SCWW never implemented the proposed program and, as a result, had not yet had an opportunity to use the sodium chlorite prior to the Incidents of November 18, 2014.

Rather, once delivered to the Facility, the sodium chlorite remained unused and contained in its properly labeled and original shipping tote, and was stored along with other treatment products and totes on a concrete pad located on the Facility. The totes delivered by Miles Chemical and stored on the concrete pad were marked or labeled as either non-hazardous wastewater for treatment or with treatment product identification information bearing the required warnings and handling protocols.

On the evening of November 17 and early morning hours of November 18, 2014, as part of the regular processing of wastewater and housekeeping efforts, SCWW employees were using a vacuum truck with a 20-foot tractor and a 40-foot trailer, and a 120-barrel capacity tank, that was owned by and leased from another company known as 805 Trucking (the "805 Vacuum Truck"). The 805 Vacuum Truck was used by SCWW exclusively on the premises of the Facility for the purpose of transferring liquids contained in totes and other storage tanks to certain receiving stations for processing and treating non-hazardous wastes located

² As part of this Investigation, it was determined that SCWW's existing hazardous materials business plan and inventory had not yet been updated via the online California Environmental Reporting System ("CERS") prior to the date of the Incidents.

throughout the Facility. The 805 Vacuum Truck was not leased or used by SCWW for any off-site purposes.

On the morning of November 18, shortly before the explosion that occurred at approximately 3:45 a.m., the 805 Vacuum Truck was being driven and operated by an employee of SCWW. Specifically, a hose on the 805 Vacuum Truck was being used to suck up non-hazardous wastewaters contained in various totes and transfer them into the 805 Vacuum Truck, which also contained non-hazardous domestic wastes. At that time, the sodium chlorite solution delivered by Miles Chemical, which was still in its original, labeled shipping tote and stored on a concrete pad, was inadvertently sucked up and transferred into the 805 Vacuum Truck. The 805 Vacuum Truck was then moved to one of several receiving stations located on the premises of the Facility in preparation for transferring the liquid mixture now contained in the Truck into an above-ground processing tank. However, before the transfer process from the 805 Vacuum Truck to the processing tank was initiated, the inadvertent mixture of the sodium chlorite with the other non-hazardous wastes contained within the Truck created a chemical reaction and pressure that resulted in the explosion.

As a result of the explosion, the rear section of the 805 Vacuum Truck ruptured and broke off, with the force of the blast scattering debris. The contents of the 805 Vacuum Truck spilled onto an area located on the premises of the Facility, including landing on the concrete containment driveway, receiving bins, totes and other items (the "Spilled Material").

Following the explosion, SCWW personnel immediately called 911 to report the explosion. The Santa Paula Fire Department was the first agency to arrive at the Facility in response to SCWW's call. Other agencies, including the Ventura County Fire and Environmental Health Departments, also soon arrived at the Facility. Upon their arrival at the Facility, personnel from the fire departments and Environmental Health Department discussed the possible cause(s) of the explosion and a proposed abatement and cleanup action plan with a SCWW representative. Further discussion determined that there was the potential for the drying Spilled Material to ignite, with SCWW representatives suggesting that the affected area be immediately sprayed with water. Soon thereafter, the Fire Department set up an area located across the street from the Facility, removed everyone from the premises and began cordoning off the Facility to prevent further access. A fire truck that had responded to the initial emergency call, and that had driven through the Spilled Material, remained parked by the Facility's entrance gate. As it was preparing to drive off, the tires of the fire truck "popped." The Fire Chief then ordered an evacuation zone to be established.

As the sun began to rise and the winds picked up, the Spilled Material dried and began to spontaneously combust. This resulted in a second incident of fire at approximately 9:45 a.m., which impacted an area of approximately 3,000 square feet in size on the premises of the Facility, including igniting totes containing chemical treatment products that were stored on a concrete pad, as well as destroying a nearby small receiving shed. The Fire Department then set up an IC Center across the street from the Facility, subsequently moving it down the road later that morning, then again moving it to its final location that evening in Santa Paula.³

³ Immediately after the Incidents, the Facility's operations and utilities were shut down and the premises secured. The location on the south side of the Facility known as the "Shipping Pit," which is the starting point for the 12-

Following the Incidents, SCWW also retained the environmental consulting firm of Haley & Aldrich to assist in identifying and implementing steps to prevent a recurrence of the Incidents, including reviewing and modifying SCWW's protocols as necessary. During this time period, the Center for Toxicology and Environmental Health, LLC ("CTEH") was also retained by Patriot to perform various environmental tasks, including a Tote Visual Assessment that was conducted in December 2014 ("Tote Assessment Report"). The purpose of the Tote Assessment Report was to locate, identify, uniquely-number, visually examine, map and photograph all of the totes located on the premises of the Facility. According to the Tote Assessment Report, one tote of sodium chlorite, which was given the unique number "TT010," was found located on a concrete storage pad along with several other similar totes in an area described as the "Northeast side of B4," and was further described in the Tote Inventory as, "Very small amount of liquid present, labeled for sodium chlorite 31.25% active."⁴ The photograph of the sodium chlorite tote contained within in the Tote Assessment Report depicts a caged tote bearing a hazardous placard with number "1908," which is the proper "corrosive" identification number for a tote containing sodium chlorite. According to the Tote Assessment Report, there was only one tote found on the premises of the Facility labeled, or in any manner identified, as containing sodium chlorite.⁵

In mid-December 2014, counsel for SCWW also engaged in several conversations with representatives of the VCDA regarding the status of the pending investigation of the Incidents, including having a face-to-face meeting with various members of the VCDA on December 12, 2014. During the course of that meeting, the stated and primary focus of the VCDA was to learn the identity (or identities) of the chemical(s) involved in the Incidents in order to assist in the aid and recovery of those injured during the Incidents, including first responders. In response to those inquiries, SCWW counsel assured the VCDA that the top priority for SCWW would be to investigate and learn the cause(s) of the Incident, including the identity of the chemical(s) that may have been involved in the explosion.

During the following week, SCWW representatives reached out to and had several discussions with USEPA's On-Scene Coordinator ("OSC") and others to arrange for the safe and timely taking of samples from the premises of the Facility. During those conversations, SCWW learned that most of the materials remaining on the premises of the Facility had been neutralized and/or solidified and therefore, might no longer prove useful in identifying the chemicals at issue in the Incidents. However, according to USEPA, the remaining contents of the 805 Vacuum Truck had not yet been neutralized and were available to be sampled. Unfortunately, due to a lack of access to the Facility, SCWW was not able to obtain any samples of the contents of the 805 Vacuum Truck until Saturday, December 20, 2014. On

mile pipeline, was also immediately closed in order to eliminate any possibility of shipping via pipeline any contaminated material to the WWTP. Subsequent testing of the effluent confirmed that no contaminated or harmful chemicals or materials were ever discharged into, or present in, the pipeline or posed any threat to the pipeline or the WWTP as a result of the Incidents.

⁴ SCWW understands that as part of its response to the Incidents, the IC identified and established certain sectors and decontamination zones on the premises of the Facility, including "Sector B4," which is the area in which the tote of sodium chlorite was found stored on the concrete pad.

⁵ As mentioned above, a single tote of sodium chlorite is consistent with SCWW records. In addition, although it may be impossible to track with absolute certainty the movements of that particular tote, it was found on a concrete pad area used for the storage of chemical treatment products during the time period it was delivered to the Facility.

that date, under the oversight of the USEPA OSC, two liquid grab samples were collected from both the intake and discharge piping assemblies of the 805 Vacuum Truck by an environmental contractor acting on the behalf of SCWW. The two samples were thereafter transported to and delivered under chain of custody to a certified laboratory for analysis. The analysis of Sample Number 1, which was obtained from the intake piping, showed the following: 120,000 parts per million (“ppm”) or 12% of chlorate and 80,000 ppm or 8% of chlorite. The analysis of Sample Number 2, which was obtained from the discharge piping, showed the following: 550 parts per billion (“ppb”) of chlorate and 1900 ppb of chlorite.⁶

On January 4, 2015, shortly after receiving the above-mentioned laboratory analyses of the two grab samples taken from the 805 Vacuum Truck, SCWW counsel notified the VCDA via email that the substances chlorate and chlorite were both found in those samples. In addition to assisting the VCDA in its efforts to identify the potential cause of the Incidents, SCWW counsel further hoped to provide any information that might be useful in the treatment and recovery of first responders by adding, “[b]ased our preliminary evaluation, it would appear that some level of chlorine dioxide and/or chlorine gas was generated during the Incident.”

CONCLUSION:

Based on the foregoing, it appears readily apparent that the treatment product sodium chlorite, when inadvertently mixed and reacting with non-hazardous wastewaters, including domestic and septic wastes, in the 805 Vacuum Truck, was the most likely and probable cause of the explosion. The primary and most compelling evidence supporting this conclusion is the finding of both chlorite and chlorate in the two liquid grab samples obtained from the 805 Vacuum Truck on December 20, 2014. Secondly, as documented in the Tote Assessment Report, the labeled and nearly-empty sodium chlorite tote was found stored on a concrete pad in an area of the Facility where the 805 Vacuum Truck had been used in processing and cleaning activities on the morning of November 18, 2014. Lastly, the nature of the subsequent fire is consistent with the presence and characteristics of drying sodium chlorite and/or chlorate, as noted in the notices and warnings provided in the applicable MSDSs.

In order to better prevent such accidents from occurring in the future, it is my understanding that professional environmental consultants have recommended, and SCWW has agreed to implement, the following policy changes:

1. The Facility will no longer accept any wastewater contained in totes. The only totes allowed to be present on the premises will contain clearly-marked and labeled chemical treatment products.
2. Additional and targeted safety training will reinforce the new policy that all liquid materials in totes are to be considered “product” and shall never be handled or

⁶ Based on commonly understood principles of chemistry, it is possible that every molecule of chlorate found in the samples was a byproduct of the reaction between sodium chlorite and other materials mixed in the 805 Vacuum Truck. As such, the finding of those concentrations of chlorate (12%) and chlorite (8%) in the sample taken from the intake piping of the 805 Vacuum Truck, is consistent with a source that is 20% or more of sodium chlorite.

processed as wastewater, along with posted detailed protocols and reminders, as well as listed potential sanctions for any violations.

This new policy has been recommended in order to prohibit any employee from pumping or transferring any material from any tote into a vacuum truck. This policy change has been designed to render it essentially impossible for this accident to ever re-occur, because it eliminates the possibility of the inadvertent mixing of any potentially incompatible materials.

Respectfully,



Michael D. Bradbury, Esq.

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4L20050

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.



Section A Required Client Information: Company: CTEH Address: 5120 Northside Dr N. Little Rock, AR Email To: K.LAWRENCE@cteh.com Phone: 501-201-8500 Requested Due Date/TAT: _____		Section B Required Project Information: Report To: Kyle Lawrence Copy To: _____ Purchase Order No.: _____ Project Name: 2009 Mission Incident Project Number: 106846		Section C Invoice Information: Attribution: _____ Company Name: _____ Address: _____ Pace Quote Reference: _____ Pace Project Manager: _____ Pace Profile #: _____	
Page: 1 of 1 1387730		REGULATORY AGENCY <input type="checkbox"/> NPDES <input type="checkbox"/> GROUND WATER <input type="checkbox"/> DRINKING WATER <input type="checkbox"/> UST <input type="checkbox"/> RCRA <input checked="" type="checkbox"/> OTHER _____ Site Location: CA STATE: _____			

ITEM #	Matrix Codes MATRIX / CODE	Matrix Codes DW WT WW P SL OL WWP AR TS OT	MATRIX CODE (see valid codes to left)	COLLECTED		SAMPLE TEMP AT COLLECTION	# OF CONTAINERS	Preservatives		Analysis Test ↑	Requested Analyte Filtered (Y/N)	Pace Project No. / Lab I.D.
				DATE	TIME			H ₂ SO ₄	HNO ₃			
1	122014 - 120 BBL - PASS	Drinking Water	WT G	12/20/14	1215		1	Unpreserved		Y	Y	
2	122014 - 120 BBL - DRIV	Water	WT G	12/20/14	1215		1	Unpreserved		Y	Y	
3		Waste Water										
4		Product										
5		Soil/Solid										
6		Oil										
7		Wipe										
8		Air										
9		Tissue										
10		Other										
11												
12												

RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME	SAMPLE CONDITIONS
Randall Woodley	12/20/14	1538	Jan Swinner - Roxy	12/20/14	1536	
ROXY	12/22/14	1312	Adrian	12/22/14	1312	9PC

ADDITIONAL COMMENTS
***OPEN IN NEG PRESSURE HOOD. POTENTIAL CHLORINE EVOLUTION.**

SAMPLER NAME AND SIGNATURE



WECK LABORATORIES, INC.

Analytical Laboratory Service - Since 1964

Analytical Service Quotation

Contact: Adam Love
Client Name: Roux Associates, Inc. - Oakland CA
Address: 555 12th Street, Ste. 1725
Oakland, CA 94607
Phone: (415) 967-6023
Fax:
Project: Roux Assoc. / Blanket

Printed: 12/22/2014
Effective: 12/22/14
Expires: 06/30/15

Code	Method	Qty	TAT (workdays)	Unit Price	Extended Price
Water					
Chlorate - EPA 300.1	EPA 300.1	2	1	\$130.00	\$260.00
Chlorite - EPA 300.1	EPA 300.1	2	1	\$130.00	\$260.00

Bid Total: \$520.00

Marilyn Romero
Client Services Manager

Payment terms are NET 30 days from invoice date. New accounts require payment prior to the release of test results until a credit application has been approved. Weck Laboratories accepts credit card payments (VISA/Master Card, American Express). Credit application/credit card approval form and Weck Laboratories' terms & conditions can be found at www.wecklabs.com under Resources



Certificate of Analysis

Report Date: 12/23/14 14:31
Received Date: 12/22/14 13:12
Turnaround Time: 1 workday

Project:

Phones: (415) 967-6023
Fax:
P.O. #:

Attn: Adam Love

Client: Roux Associates, Inc. - Oakland CA
555 12th Street, Ste. 1725
Oakland, CA 94607

Dear Adam Love :

Enclosed are the results of analyses for samples received 12/22/2014 with the Chain of Custody document. The samples were received in good condition, at 3.9 °C and on ice. All analysis met the method criteria except as noted below or in the report with data qualifiers.

Lab Sample ID: 4L22050-01	Sample ID: 122014-120BBL-Pass	Matrix: Water								
Sampled by: Client	Sampled: 12/20/14 12:15									
Analyte	Result	MDL	MRL	Units	Dil	Method	Prepared	Analyzed	Batch	Qualifier
Chlorate	120000000		5000000	ug/l	500000	EPA 300.1	12/23/14	12/23/14 10:05	W4L1400	
Chlorite	80000000		5000000	ug/l	500000	EPA 300.1	12/23/14	12/23/14 10:05	W4L1400	
Surrogate: Dichloroacetate	106 %		90-115	%		Concentration:528				
Surrogate: Dichloroacetate	106 %		90-115	%		Concentration:528				

Lab Sample ID: 4L22050-02	Sample ID: 122014-120BBL-Driv	Matrix: Water								
Sampled by: Client	Sampled: 12/20/14 12:15									
Analyte	Result	MDL	MRL	Units	Dil	Method	Prepared	Analyzed	Batch	Qualifier
Chlorate	550		500	ug/l	50	EPA 300.1	12/23/14	12/23/14 11:48	W4L1400	
Chlorite	1900		500	ug/l	50	EPA 300.1	12/23/14	12/23/14 11:48	W4L1400	
Surrogate: Dichloroacetate	93 %		90-115	%		Concentration:467				
Surrogate: Dichloroacetate	93 %		90-115	%		Concentration:467				



Certificate of Analysis

Quality Control Section

Anions by IC, EPA Method 9056 - Quality Control

Batch W4L1400 - EPA 300.1

Blank (W4L1400-BLK1)

Prepared: 12/23/14 Analyzed: 12/23/14 09:45

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		527		ug/l	500	105	90-115		
Surrogate: Dichloroacetate		527		ug/l	500	105	90-115		
Chlorate		ND		ug/l					
Chlorite		ND		ug/l					

LCS (W4L1400-BS1)

Prepared: 12/23/14 Analyzed: 12/23/14 09:25

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		498		ug/l	500	100	90-115		
Surrogate: Dichloroacetate		498		ug/l	500	100	90-115		
Chlorate		101		ug/l	100	101	85-115		
Chlorite		95.7		ug/l	100	96	85-115		

Matrix Spike (W4L1400-MS1)

Source: 4L22050-01

Prepared: 12/23/14 Analyzed: 12/23/14 12:08

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		500		ug/l	500	100	90-115		
Surrogate: Dichloroacetate		500		ug/l	500	100	90-115		
Chlorate	115000000	172000000		ug/l	50000000	114	76-120		
Chlorite	80000000	127000000		ug/l	50000000	93	78-129		

Matrix Spike Dup (W4L1400-MSD1)

Source: 4L22050-01

Prepared: 12/23/14 Analyzed: 12/23/14 12:28

Analyte	Sample Result	QC Result	Qualifier	Units	Spike Level	%REC	%REC Limits	RPD	RPD Limit
Surrogate: Dichloroacetate		508		ug/l	500	102	90-115		
Surrogate: Dichloroacetate		508		ug/l	500	102	90-115		
Chlorate	115000000	168000000		ug/l	50000000	107	76-120	2	20
Chlorite	80000000	128000000		ug/l	50000000	96	78-129	1	20

Certificate of Analysis

Notes:

The Chain of Custody document is part of the analytical report.

Any remaining sample(s) for testing will be disposed of one month from the final report date unless other arrangements are made in advance.

All results are expressed on wet weight basis unless otherwise specified.

An Absence of Total Coliform meets the drinking water standards as established by the State of California Department of Health Services.

The Reporting Limit (RL) is referenced as laboratory's Practical Quantitation Limit (PQL).

For Potable water analysis, the Reporting Limit (RL) is referenced as Detection Limit for reporting purposes (DLRs) defined by EPA.

If sample collected by Weck Laboratories, sampled in accordance to lab SOP MIS002

Authorized Signature

Contact: Valerie Rejuso
(Project Manager)



ELAP # 1132
LACSD # 10143
NELAC # 04229CA

The results in this report apply to the samples analyzed in accordance with the chain of custody document. Weck Laboratories certifies that the test results meet all requirements of NELAC unless noted in the Case Narrative. This analytical report must be reproduced in its entirety.

Flags for Data Qualifiers:

- ND NOT DETECTED at or above the Reporting Limit. If J-value reported, then NOT DETECTED at or above the Method Detection Limit (MDL).
- Sub Subcontracted analysis, original report enclosed.
- DL Method Detection Limit
- RL Method Reporting Limit
- MDA Minimum Detectable Activity
- NR Not Reportable

Mission Incident
Santa Paula, CA
Preliminary Tote Visual Assessment
December 30, 2014

Prepared by
Center for Toxicology and Environmental Health, L.L.C. (CTEH®)

Totes present within the perimeter of the Santa Clara Wastewater Co. facility were visually assessed and documented by CTEH® personnel as of December 30, 2014. Additional totes may be present that have not yet been discovered. Table 1 below contains a list of totes found including responder comments and category assigned by an onsite chemist. Table 2 contains a total count of totes organized by each category. Also attached is a map depicting each tote location within the facility as well as photos and documentation from field personnel.

Table 1 - Tote Inventory – Visual Assessment¹

Tote ID	Comments	Category ²
TT001	2-3inches of liquid in bottom, label says water softener brine	Empty
TT002	Very little liquid, label says water softener brine	Empty
TT003	Very little amount of water, written label says -salt softener regen brine	Empty
TT004	Small amount of liquid, contents on label salt softener regen brine	Empty
TT005	3/4 full, labeled as COPREP 320-L	Polymer
TT006	Thick white polymer	Polymer
TT007	Appears empty and with no label	Empty
TT008	There is a little bit of solid in the bottom, no label	Empty
TT009	About 80% full, labeled COPREP 460TC	Polymer
TT010	Very small amount of liquid present, labeled for sodium chlorite 31.25% active	Hypochlorite
TT011	Empty and unlabeled	Empty
TT012	Small amount of liquid in bottom, no label	Empty
TT013	Very small amount of liquid in bottom, no label	Empty
TT014	Unknown level of liquid, labeled for sulfuric acid	Acid
TT015	Labeled for sulfuric acid	Acid
TT016	Tote labeled for sulfuric acid very little liquid in side	Acid
TT017	700 gallon tote with 5-6 inches of fluid at the bottom, no label present	Peroxide
TT018	1/3rd full tote with labels for ferric sulfate 50% solution	Ferric Sulfate
TT019	Tote is approximately 15% full. Liquid is clear with some particulate matter.	Pres. Wash Container
TT020	Appears to be empty, no label apparent	Empty
TT021	4/5ths full, on raised platform, no label	Process Container
TT022	No label, seems to be at least half full, to looks dark, tote in 4-6 inches of liquid	Acid
TT023	1/4 full, no label, opaque liquid	Polymer
TT024	1/3 full of grey solid looking substance, no label	Polymer
TT025	Half full of liquid, no label,	Peroxide
TT026	About 10inches of liquid, no label	Process Container
TT027	250 gallons of unknown liquid, no label	Process Container
TT028	Large container 2/3rds full of hydrogen peroxide	Peroxide
TT029	Half full with hand written H2O2	Peroxide
TT030	COPREP 460TC on label and about 80% full	Process Container
TT031	3/4full, label says - COPREP 460TC	Process Container
TT032	Inside is dry, no label	Empty

¹Note: The data set displayed here has not undergone complete QA/QC analysis and is presented in a preliminary format

²Totes categorized as Empty contain less than or equal to one inch of product (RCRA empty)

Table 1 - Tote Inventory – Visual Assessment (continued)¹

Tote ID	Comments	Category ²
TT033	About 12 inches of liquid on a stand, label unclear but says - 460TC	Process Container
TT034	12 inches of liquid no readable label	Process Container
TT035	2/3 full, on stand, no label	Process Container
TT036	About 1/3rd full, unknown liquid on raised stand, no label	Process Container
TT037	3/4 full of white polymer like substance with pump attached, labeled	Polymer
TT038	2/3rd full about 150-175 gallons of black liquid sitting in a plastic base with white fluid	Flammable
TT039	Empty Tank - updated duplicate ID from TT037 to TT039	Empty
TT040	Empty tote on elevated stand with label for ferric sulfate 50% solution	Empty
TT041	Empty tote labeled for caustic soda 50%	Empty
TT042	Empty ferric sulfate 50% solution tote	Empty
TT043	Empty tote labeled for hypochlorite solution	Empty
TT044	Empty tote labeled for caustic soda	Empty
TT045	Empty tote labeled for H2O2	Empty
TT046	No label present and 4-5 inches of liquid in the bottom	Process Container
TT047	White polymer-like substance in bottom 5-6 inches of tote. No label present	Polymer
TT048	Empty tote, degraded label, with bags of NaOH	Empty
TT049	Empty tote no label	Empty
TT050	Empty tote, no label	Empty
TT051	Tote appears empty and no label	Empty
TT052	Tote appears empty and no label	Empty
TT053	Empty tote, no label	Empty
TT054	Some solid in downslope corner of tote and no label	Empty
TT055	Empty tote labeled as COPREP 320 L	Empty
TT056	Appears empty, hand written label for waste water/dietary supp	Empty
TT057	No readable label and empty	Empty
TT058	Empty 50 gallon barrel, labeled for chlorine dioxide	Empty
TT059	Appears empty, no apparent label	Empty
TT060	Appears empty 50 gallon drum, label says, wolf berry liquid extract	Empty
TT061	In metal cage on platform, no label, 3-4 inches of liquid	Process Container
TT062	Empty container, no clear label	Empty
TT063	Deformed tote with no label	Empty
TT064	12 inches of clear liquid. Tote is in tan con ex box.	Acid

¹Note: The data set displayed here has not undergone complete QA/QC analysis and is presented in a preliminary format

²Totes categorized as empty contain less than or equal to one inch of product (RCRA empty)

Table 2 – Total Tote Count by Category

Totals ¹			
Acid	5	Peroxide	4
Empty	33	Polymer	7
Ferric Sulfate	1	Pressure Wash Container	1
Flammable	1	Process Container	11
Hypochlorite	1	TOTAL	64

¹Note: The data set displayed here has not undergone complete QA/QC analysis and is presented in a preliminary format



Tote Locations - 2014-12-30

Mission Incident

Project: 106846
Client: Patriot Environmental
City: Santa Paula, CA
County: Ventura



106846 - MISSION INCIDENT Site Activities - Tote Visual Assessment

ID: 127203

GPS: 34.31482, -119.10429

Date: 2014/12/30 13:32 **Location Description:** West tote bank

Primary Identifier: TT001

Observation Type: Survey

Secondary Identifier: TT001

Observation Subtype: Existing Fixed Location

Comments: 2-3inches of liquid in bottom, label says water softener brine



ID: 127184

GPS: 34.31482, -119.10428

Date: 2014/12/30 13:31 **Location Description:** West tote farm

Primary Identifier: TT002

Observation Type: Survey

Secondary Identifier: TT002

Observation Subtype: Existing Fixed Location

Comments: Very little liquid, label says water softener brine



ID: 127206

GPS: 34.31487, -119.10429

Date: 2014/12/30 13:29 **Location Description:** West tote farm

Primary Identifier: TT003

Observation Type: Survey

Secondary Identifier: TT003

Observation Subtype: Existing Fixed Location

Comments: Very little amount of water, written label says -salt softener regen brine



ID: 127163

GPS: 34.31491, -119.10426

Date: 2014/12/30 11:52 **Location Description:** West tote farm

Primary Identifier: TT004

Observation Type: Survey

Secondary Identifier: TT004

Observation Subtype: Existing Fixed Location

Comments: Small amount of liquid, contents on label salt softener regen brine



ID: 127151

GPS: 34.31494, -119.1044

Date: 2014/12/30 11:23 **Location Description:** West tote farm

Primary Identifier: TT005

Observation Type: Survey

Secondary Identifier: TT005

Observation Subtype: Existing Fixed Location

Comments: 3/4 full, labeled as COPREP 320-L



ID: 127272

GPS: 34.31492, -119.10442

Date: 2014/12/29 15:14 **Location Description:** West tote farm

Primary Identifier: TT006

Observation Type: Survey

Secondary Identifier: TT006

Observation Subtype: Existing Fixed Location

Comments: Thick white polymer



ID: 127158

GPS: 34.3151, -119.1044

Date: 2014/12/30 11:26 **Location Description:** West tote farm

Primary Identifier: TT007

Observation Type: Survey

Secondary Identifier: TT007

Observation Subtype: Existing Fixed Location

Comments: Appears empty and with no label



ID: 127182

GPS: 34.31498, -119.10439

Date: 2014/12/30 11:35 **Location Description:** West tote farm in B4

Primary Identifier: TT008

Observation Type: Survey

Secondary Identifier: TT008

Observation Subtype: Existing Fixed Location

Comments: There is a little bit of solid in the bottom, no label



ID: 127150

GPS: 34.31507, -119.10432

Date: 2014/12/30 11:30 **Location Description:** West tote farm in B4

Primary Identifier: TT009

Observation Type: Survey

Secondary Identifier: TT009

Observation Subtype: Existing Fixed Location

Comments: About 80% full, labeled COPREP 460TC



ID: 127164

GPS: 34.31504, -119.10427

Date: 2014/12/30 11:46 **Location Description:** Northeast side of B4

Primary Identifier: TT010 **Observation Type:** Survey

Secondary Identifier: TT010 **Observation Subtype:** Existing Fixed Location

Comments: Very small amount of liquid present, labeled for sodium chlorite 31.25% active



ID: 127153

GPS: 34.31498, -119.10423

Date: 2014/12/30 11:48 **Location Description:** Tote in group between frac tanks near SW corner of hot zone.

Primary Identifier: TT011 **Observation Type:** Survey

Secondary Identifier: TT011 **Observation Subtype:** Existing Fixed Location

Comments: Empty and unlabeled



ID: 127159

GPS: 34.31501, -119.10425

Date: 2014/12/30 11:45 **Location Description:** Tote in group between frac tanks near SW corner of hot zone

Primary Identifier: TT012 **Observation Type:** Survey

Secondary Identifier: TT012 **Observation Subtype:** Existing Fixed Location

Comments: Small amount of liquid in bottom, no label



ID: 127160

GPS: 34.31502, -119.10427

Date: 2014/12/30
11:43

Location Description: Tote in group between frac tanks near SW corner of hot zone

Primary Identifier: TT013

Observation Type: Survey

Secondary Identifier: TT013

Observation Subtype: Existing Fixed Location

Comments: Very small amount of liquid in bottom, no Label



ID: 127148

GPS: 34.31453, -119.10442

Date: 2014/12/30 09:52

Location Description: A1 southwest of A2

Primary Identifier: TT014

Observation Type: Survey

Secondary Identifier: TT014

Observation Subtype: Existing Fixed Location

Comments: Unknown level of liquid, labeled for sulfuric acid



ID: 127139

GPS: 34.3145, -119.10444

Date: 2014/12/30 09:45

Location Description:

Primary Identifier: TT015

Observation Type: Survey

Secondary Identifier: TT015

Observation Subtype: Existing Fixed Location

Comments: Labeled for sulfuric acid



ID: 127144

GPS: 34.31451, -119.10439

Date: 2014/12/30 09:47 **Location Description:** A1 southwest of A2

Primary Identifier: TT016 **Observation Type:** Survey

Secondary Identifier: TT016 **Observation Subtype:** Existing Fixed Location

Comments: Tote labeled for sulfuric acid very little liquid in side



ID: 127136

GPS: 34.31453, -119.1044

Date: 2014/12/30 09:37 **Location Description:** A1 by fire fighters station

Primary Identifier: TT017 **Observation Type:** Survey

Secondary Identifier: TT017 **Observation Subtype:** Existing Fixed Location

Comments: 700 gallon tote with 5-6 inches of fluid at the bottom, no label present



ID: 127149

GPS: 34.3144, -119.10429

Date: 2014/12/30 09:33 **Location Description:** Next to fire station in A1

Primary Identifier: TT018 **Observation Type:** Survey

Secondary Identifier: TT018 **Observation Subtype:** Existing Fixed Location

Comments: 1/3rd full tote with labels for ferric sulfate 50% solution



ID: 127212

GPS: 34.31529, -119.10468

Date: 2014/12/30 09:27 **Location Description:** Tote on trailer of pressure washer

Primary Identifier: TT019

Observation Type: Survey

Secondary Identifier: TT019

Observation Subtype: Existing Fixed Location

Comments: Tote is approximately 15% full. Liquid is clear with some particulate matter. Tote is water container connected to pressure washer.



ID: 127189

GPS: 34.3153, -119.10433

Date: 2014/12/30 13:44 **Location Description:** Next to frac tank A2463

Primary Identifier: TT020

Observation Type: Survey

Secondary Identifier: TT020

Observation Subtype: Existing Fixed Location

Comments: Appears to be empty, no label apparent



ID: 127199

GPS: 34.31523, -119.10393

Date: 2014/12/30 13:55 **Location Description:** Northwest of patriot vac truck in pool

Primary Identifier: TT021

Observation Type: Survey

Secondary Identifier: TT021

Observation Subtype: Existing Fixed Location

Comments: 4/5ths full, on raised platform, no label



ID: 127177

GPS: 34.31446, -119.10401

Date: 2014/12/30 14:37 **Location Description:** Next to B1 and A1

Primary Identifier: TT022

Observation Type: Survey

Secondary Identifier: TT022

Observation Subtype: Existing Fixed Location

Comments: No label, seems to be at least half full, to looks dark, tote in 4-6 inches of liquid



ID: 127201

GPS: 34.31445, -119.10401

Date: 2014/12/30 14:40 **Location Description:** In unmarked area next to corner of A1 and B1

Primary Identifier: TT023

Observation Type: Survey

Secondary Identifier: TT023

Observation Subtype: Existing Fixed Location

Comments: 1/4 full, no label, opaque liquid



ID: 127185

GPS: 34.31446, -119.104

Date: 2014/12/30 14:42 **Location Description:** In unmarked area next to corner of A1 and B1

Primary Identifier: TT024

Observation Type: Survey

Secondary Identifier: TT024

Observation Subtype: Existing Fixed Location

Comments: 1/3 full of grey solid looking substance, no label



ID: 127204

GPS: 34.3144, -119.10402

Date: 2014/12/30 14:48 **Location Description:** In unmarked area next to corner of A1 and B1

Primary Identifier: TT025 **Observation Type:** Survey

Secondary Identifier: TT025 **Observation Subtype:** Existing Fixed Location

Comments: Half full of liquid, no label,



ID: 127195

GPS: 34.31442, -119.10399

Date: 2014/12/30 14:47 **Location Description:** In unmarked area next to corner of A1 and B1

Primary Identifier: TT026 **Observation Type:** Survey

Secondary Identifier: TT026 **Observation Subtype:** Existing Fixed Location

Comments: About 10inches of liquid, no label



ID: 127198

GPS: 34.31445, -119.10397

Date: 2014/12/30 14:45 **Location Description:** In unmarked area next to corner of A1 and B1

Primary Identifier: TT027 **Observation Type:** Survey

Secondary Identifier: TT027 **Observation Subtype:** Existing Fixed Location

Comments: 250 gallons of unknown liquid, no label



ID: 127193

GPS: 34.31455, -119.10392

Date: 2014/12/30 14:14 **Location Description:** East corner of B1

Primary Identifier: TT028

Observation Type: Survey

Secondary Identifier: TT028

Observation Subtype: Existing Fixed Location

Comments: Large container 2/3rds full of hydrogen peroxide



ID: 127197

GPS: 34.31462, -119.10385

Date: 2014/12/30 14:16 **Location Description:** East corner of B1

Primary Identifier: TT029

Observation Type: Survey

Secondary Identifier: TT029

Observation Subtype: Existing Fixed Location

Comments: Half full with hand written H2O2



ID: 127190

GPS: 34.31503, -119.10406

Date: 2014/12/30 14:03 **Location Description:** Border of C1 and C2

Primary Identifier: TT030

Observation Type: Survey

Secondary Identifier: TT030

Observation Subtype:

Comments: COPREP 460TC on label and about 80% full



ID: 127191

GPS: 34.31506, -119.10406

Date: 2014/12/30 14:06 **Location Description:** Border of C1 and C2

Primary Identifier: TT031

Observation Type: Survey

Secondary Identifier: TT031

Observation Subtype:

Comments: 3/4full, label says - COPREP 460TC



ID: 127183

GPS: 34.31461, -119.10386

Date: 2014/12/30 14:18 **Location Description:** East of B1

Primary Identifier: TT032

Observation Type: Survey

Secondary Identifier: TT032

Observation Subtype: Existing Fixed Location

Comments: Inside is dry, no label



ID: 127179

GPS: 34.31474, -119.10364

Date: 2014/12/30 14:23 **Location Description:** Southeast of frac tank A18460T

Primary Identifier: TT033

Observation Type: Survey

Secondary Identifier: TT033

Observation Subtype: Existing Fixed Location

Comments: About 12 inches of liquid on a stand, label unclear but says - 460TC



ID: 127202

GPS: 34.31475, -119.10368

Date: 2014/12/30 14:27 **Location Description:** Southeast of frac tank A1846OT

Primary Identifier: TT034

Observation Type: Survey

Secondary Identifier: TT034

Observation Subtype: Existing Fixed Location

Comments: 12 inches of liquid no readable label



ID: 127200

GPS: 34.3148, -119.10334

Date: 2014/12/30 14:57 **Location Description:** By water and mulch pile

Primary Identifier: TT035

Observation Type: Survey

Secondary Identifier: TT035

Observation Subtype: Existing Fixed Location

Comments: 2/3 full, on stand, no label



ID: 127145

GPS: 34.31448, -119.10397

Date: 2014/12/30 09:11 **Location Description:** On concrete pad across from plastic wrapped shack

Primary Identifier: TT036

Observation Type: Survey

Secondary Identifier: TT036

Observation Subtype: Existing Fixed Location

Comments: About 1/3rd full, unknown liquid on raised stand, no label



ID: 127135

GPS: 34.31446, -119.10397

Date: 2014/12/30
09:07

Location Description: Across from plastic covered shack on concrete pad

Primary Identifier: TT037

Observation Type: Survey

Secondary Identifier: TT037

Observation Subtype: Existing Fixed Location

Comments: 3/4 full of white polymer like substance with pump attached, labeled



ID: 127142

GPS: 34.31459, -119.10374

Date: 2014/12/30 08:56

Location Description: Adjacent to decon C

Primary Identifier: TT038

Observation Type: Survey

Secondary Identifier: TT038

Observation Subtype: Existing Fixed Location

Comments: 2/3rd full about 150-175 gallons of black liquid sitting in a plastic base with white fluid



ID: 127140

GPS: 34.31414, -119.10381

Date: 2014/12/30 08:52

Location Description: Adjacent to decon C

Primary Identifier: TT039

Observation Type: Survey

Secondary Identifier: TT039

Observation Subtype: New Fixed Location

Comments: Empty Tank - updated duplicate ID from TT037 to TT039



ID: 127146

GPS: 34.31448, -119.10418

Date: 2014/12/30 09:22 **Location Description:** East the southeast corner of A1 and B1

Primary Identifier: TT040

Observation Type: Survey

Secondary Identifier: TT040

Observation Subtype: New Fixed Location

Comments: Empty tote on elevated stand with label for ferric sulfate 50% solution



ID: 127141

GPS: 34.31438, -119.10434

Date: 2014/12/30 09:26 **Location Description:** A1 south of firefighters station

Primary Identifier: TT041

Observation Type: Survey

Secondary Identifier: TT041

Observation Subtype: New Fixed Location

Comments: Empty tote labeled for caustic soda 50%



ID: 127147

GPS: 34.31448, -119.1043

Date: 2014/12/30 09:30 **Location Description:** A1 by fire fighters station

Primary Identifier: TT042

Observation Type: Survey

Secondary Identifier: TT042

Observation Subtype: New Fixed Location

Comments: Empty ferric sulfate 50% solution tote



ID: 127138

GPS: 34.31454, -119.10445

Date: 2014/12/30 09:41 **Location Description:** A1 southwest of A2

Primary Identifier: TT043 **Observation Type:** Survey

Secondary Identifier: TT043 **Observation Subtype:** New Fixed Location

Comments: Empty tote labeled for hypochlorite solution



ID: 127143

GPS: 34.31456, -119.10437

Date: 2014/12/30 09:50 **Location Description:** A1 southwest of A2

Primary Identifier: TT044 **Observation Type:** Survey

Secondary Identifier: TT044 **Observation Subtype:** New Fixed Location

Comments: Empty tote labeled for caustic soda



ID: 127137

GPS: 34.31454, -119.10448

Date: 2014/12/30 09:53 **Location Description:**

Primary Identifier: TT045 **Observation Type:** Survey

Secondary Identifier: TT045 **Observation Subtype:** New Fixed Location

Comments: Empty tote labeled for H2O2



ID: 127188

GPS: 34.31495, -119.10341

Date: 2014/12/30 10:52

Location Description: Southwest side of saturated media pile next to container ARTU 7001808

Primary Identifier: TT046

Observation Type: Survey

Secondary Identifier: TT046

Observation Subtype: New Fixed Location

Comments: No label present and 4-5 inches of liquid in the bottom



ID: 127192

GPS: 34.31498, -119.10345

Date: 2014/12/30 10:55

Location Description: Southwest side of saturated media pile next to container ARTU 7001808

Primary Identifier: TT047

Observation Type: Survey

Secondary Identifier: TT047

Observation Subtype: New Fixed Location

Comments: White polymer like substance in bottom 5-6 inches of tote. No label present



ID: 127155

GPS: 34.31496, -119.10439

Date: 2014/12/30 11:17

Location Description: B4 next to water truck

Primary Identifier: TT048

Observation Type: Survey

Secondary Identifier: TT048

Observation Subtype: New Fixed Location

Comments: Empty tote, degraded label, with bags of NaOH



ID: 127180

GPS: 34.31497, -119.10439

Date: 2014/12/30 11:19 **Location Description:** B4

Primary Identifier: TT049

Observation Type: Survey

Secondary Identifier: TT049

Observation Subtype: New Fixed Location

Comments: Empty tote no label



ID: 127157

GPS: 34.315, -119.10432

Date: 2014/12/30 11:21 **Location Description:** B4

Primary Identifier: TT050

Observation Type: Survey

Secondary Identifier: TT050

Observation Subtype: New Fixed Location

Comments: Empty tote, no label



ID: 127156

GPS: 34.31498, -119.1044

Date: 2014/12/30 11:28 **Location Description:** West tote farm in B4

Primary Identifier: TT051

Observation Type: Survey

Secondary Identifier: TT051

Observation Subtype: New Fixed Location

Comments: Tote appears empty and no label



ID: 127154

GPS: 34.31506, -119.10427

Date: 2014/12/30 11:29 **Location Description:** West tote farm in B4

Primary Identifier: TT052

Observation Type: Survey

Secondary Identifier: TT052

Observation Subtype: New Fixed Location

Comments: Tote appears empty and no label



ID: 127186

GPS: 34.315, -119.10434

Date: 2014/12/30 11:37 **Location Description:** West tote farm in B4

Primary Identifier: TT053

Observation Type: Survey

Secondary Identifier: TT053

Observation Subtype: New Fixed Location

Comments: Empty tote, no label



ID: 127161

GPS: 34.31498, -119.10429

Date: 2014/12/30 11:38 **Location Description:** West tote farm

Primary Identifier: TT054

Observation Type: Survey

Secondary Identifier: TT054

Observation Subtype: New Fixed Location

Comments: Some solid in downslope corner of tote and no label



ID: 127162

GPS: 34.31502, -119.10435

Date: 2014/12/30 11:41 **Location Description:** West tote farm in B4

Primary Identifier: TT055 **Observation Type:** Survey

Secondary Identifier: TT055 **Observation Subtype:** New Fixed Location

Comments: Empty tote labeled as COPREP 320 L



ID: 127152

GPS: 34.31493, -119.1043

Date: 2014/12/30 11:50 **Location Description:** South side of tote farm in B4

Primary Identifier: TT056 **Observation Type:** Survey

Secondary Identifier: TT056 **Observation Subtype:** New Fixed Location

Comments: Appears empty, hand written label for waste water/dietary supp



ID: 127187

GPS: 34.31484, -119.10432

Date: 2014/12/30 13:35 **Location Description:** West tote farm in B2

Primary Identifier: TT057 **Observation Type:** Survey

Secondary Identifier: TT057 **Observation Subtype:** New Fixed Location

Comments: No readable label and empty



ID: 127178

GPS: 34.31529, -119.10465

Date: 2014/12/30 13:38 **Location Description:** Next to northwest fence line

Primary Identifier: TT058

Observation Type: Survey

Secondary Identifier: TT058

Observation Subtype: New Fixed Location

Comments: Empty 50 gallon barrel, labeled for chlorine dioxide



ID: 127205

GPS: 34.3153, -119.1044

Date: 2014/12/30 13:48 **Location Description:** West of frac tank A2463

Primary Identifier: TT059

Observation Type: Survey

Secondary Identifier: TT059

Observation Subtype: New Fixed Location

Comments: Appears empty, no apparent label



ID: 127194

GPS: 34.3153, -119.10431

Date: 2014/12/30 13:50 **Location Description:** West of frac tank A2463

Primary Identifier: TT060

Observation Type: Survey

Secondary Identifier: TT060

Observation Subtype: New Fixed Location

Comments: Appears empty 50 gallon drum, label says, wolf berry liquid extract



ID: 127181

GPS: 34.31518, -119.10381

Date: 2014/12/30 13:59 **Location Description:** Northwest of pool next to green vertices

Primary Identifier: TT061 **Observation Type:** Survey

Secondary Identifier: TT061 **Observation Subtype:** New Fixed Location

Comments: In metal cage on platform, no label, 3-4 inches of liquid



ID: 127196

GPS: 34.31481, -119.10371

Date: 2014/12/30 14:21 **Location Description:** Northeast of B1 next to pool

Primary Identifier: TT062 **Observation Type:** Survey

Secondary Identifier: TT062 **Observation Subtype:** New Fixed Location

Comments: Empty container, no clear label



ID: 127207

GPS: 34.31496, -119.10329

Date: 2014/12/30 15:00 **Location Description:** By saturated media pile and green light plant

Primary Identifier: TT063 **Observation Type:** Survey

Secondary Identifier: TT063 **Observation Subtype:** New Fixed Location

Comments: Deformed tote with no label



ID: 127320

GPS: 34.31509, -119.10387

Date: 2015/01/01 16:21 **Location Description:** TR064

Primary Identifier: TT064

Observation Type: Survey

Secondary Identifier: Tote

Observation Subtype: New Fixed Location

Comments: 12 inches of clear liquid. Tote is in tan con ex box.

