

Exhibit No. 9

**Completion Report
Prepared by Kemron Environmental Services, Inc.
Dated September 26, 2008**

Completion Report

Prepared for:

Davis Partners Inc.
9774 Crescent Center Drive, Suite 506
Rancho Cucamonga, CA

and

United States
Environmental Protection Agency
75 Hawthorn Street
Region IX
San Francisco, CA

at

U.S. Colloidal Essence, Inc.
9330 7th Avenue, Suite A
Rancho Cucamonga, CA
EPA Order No: 9-2008-0012

Prepared by:

KEMRON
ENVIRONMENTAL SERVICES

KEMRON Environmental Services, Inc
1359-A Ellsworth Industrial Boulevard
Atlanta, Ga. 30318

September 2008

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
1.1	Site History and Contaminates.....	1
2.0	Removal Action	2
2.1	Scope of Work	2
2.2	Technical Approach	2
2.2.1	Identification and Segregation	3
2.2.2	Tanks, Totes and Process Pipe Decontamination	4
2.2.3	Sampling	4
2.2.4	Demobilization.....	5
3.0	Subcontractors	5
3.1	Material Profiling and Labeling.....	5
3.2	Transportation and Disposal	5
4.0	SUBMITTAL AND REPORTING REQUIRMENTS	6
4.1	Project Documentation.....	6
4.2	Project Closeout	6

FIGURES

Figure 1 – Site Location Map

Figure 2 – Facility Map

TABLES

Table 1 – KEMRON Drum Log

APPENDICIES

Appendix A – Packing Lists

Appendix B – Laboratory Analytical Report

Appendix C – Waste Profiles

Appendix D – Generator Manifests

Appendix E – Cost Summary

1.0 INTRODUCTION

KEMRON Environmental Services, Inc. (KEMRON) was contracted by Davis Partners, Inc. (Davis Partners) to manage the segregation and disposal of liquid and solid hazardous materials from a 6,000 square foot space located in the southwest portion of a large industrial park owned by Walton CWCA Golden West 70 LLC (Walton). The subject site is located at 9330 7th Avenue, Suite A, Rancho Cucamonga, California (Figure 1). The suite was formerly occupied by U.S. Colloidal Essence, Inc. (USCE), a chemical formulation facility that created personal care products, cleaners, and degreasers (Figure 2).

1.1 Site History and Contaminates

On March 17, 2008, the San Bernardino County Fire Department (SBCoFD) requested the U.S. Environmental Agency (EPA) assistance with the management and/or removal of chemicals from this facility due to fire code violations and hazardous materials mismanagement. The Rancho Cucamonga Fire Department (RCFD) red tagged the facility (i.e., deemed it too unsafe to enter) and the District Attorney's Office arrested the owner for fraud.

On March 18, 2008, the EPA tasked the Ecology and Environment Inc. (E & E) Superfund Technical Assessment and Response Team (START), via EPA Region 10 START contract, to provide technical assistance to EPA On-Scene Coordinator (OSC) Craig Benson of the Emergency Rapid Response Section (ERRS). E & E was tasked with the identification of improperly managed chemicals at the US Colloidal, Inc. facility in Rancho Cucamonga, California.

USCE was placed under the Unilateral Administrative Order # 9-2008-0012 issued by the EPA Region 9 under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) regulations to perform a removal action at the facility.

The site contained large quantities of hazardous material including caustic, acidic, flammable and surfactant materials. According to initial site inspections performed by the EPA and START, the site contained approximately one hundred 55-gallon drums, two dozen processing tanks, large quantities of reagent chemicals and small containers of hand marked solutions and poly totes ranging from 250 – 4,000 gallons. There were several distinct laboratory areas within the structure along with a large inventory of chemicals and unfilled empty bottles. Chemically stained plywood flooring covered approximately half of the process area. The site was secured by the EPA and eighty-six (86) drums of non-hazardous materials were moved to a temporary storage trailer to make help stabilize the material and aid in identifying hazards. The area was placed under twenty-four hour security provided by Walton to prevent public access to the hazardous chemicals.

2.0 Removal Action

2.1 Scope of Work

Removal action objectives were based on the contaminated media, potential human health and environmental threats, and regulatory standards, requirements, and guidance. The removal action scope of work included the following:

- Prepare and submit the following documents in accordance with EPA Order # 9-2008-0012: Work Plan (WP) that includes a Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP), and Site Specific Health and Safety Plan (SSHSP) [attached as Appendix B, C, and D].
- Establish safe site access, fencing, signs, security, staging areas, lighting, and communications.
- Create additional work space by removing boxes containing empty plastic containers.
- Conduct daily safety and operational meetings.
- Perform Hazardous Categorization (Hazscan) in accordance with KEMRON Standard Operating Procedure (08-HAZ-00) for identification and segregation of material on-site.
- Establish staging areas based on hazard class for all segregated materials.
- Remove residual material from tanks, totes and associated process lines and containerize for disposal.
- Provide personnel, equipment, and materials needed for the decontamination of abandoned PVC and stainless steel process piping.
- Package, label, and mark all containers in accordance with Department of Transportation (DOT) regulations.
- Prepare shipping manifests and related documents in accordance with DOT and the California Environmental Protection Agency (Cal/EPA) regulations.
- Provide transportation and disposal for all waste recovered during segregation and staging efforts. Disposal will be in accordance with DOT and the Cal/EPA regulations.

2.2 Technical Approach

On May 12, 2008, KEMRON mobilized to the subject site to commence removal action activities in accordance with KEMRON's Work Plan and the associated Site Specific Health and Safety Plan (SSHSP) and Quality Assurance Project Plan/Field Sampling Plan approved by the EPA on May 1, 2008.

KEMRON utilized the existing site office as a field office during length of the project. Material Safety Data Sheets (MSDS) for material identified on site were maintained on-site and were used to build a material tracking log and prepare shipping documents. KEMRON stored all equipment in the building including the forklift, testing kits, PPE,

etc. and utilized the warehouse area for hazardous categorization of unidentified materials. Work was conducted in Level C and Level D PPE in accordance with the SSHSP. Daily continuous reading air monitoring was conducted with a Multi-Rae five gas meter.

In conjunction with KEMRON's mobilization to the subject site, Davis Partners utilized a commercial moving crew to remove furniture, tools, books, laboratory equipment, and unused, clean plastic containers to provide a safer workspace with room to stage the waste. These items were deemed salvageable by Davis Partners and were placed in one of their vacant rental spaces to later be auctioned.

2.2.1 Identification and Segregation

KEMRON conducted hazardous categorization of all material onsite, with the exception of new/unopened drums containing original labeling, for segregation purposes in accordance with KEMRON SOP 08-HAZ-00. As material was identified KEMRON segregated material into the proper DOT hazard classes and packaged the material for shipping in accordance with DOT and Cal/EPA regulations. Hazardous categorization allowed for the safe and effective bulking of materials, specifically material contained in laboratory glassware and small unlabeled vessels. KEMRON also bulked material identified as Non-hazardous or Non-RCRA to simplify the disposal process. These materials included US Colloidal's finished products in the form of degreasers, shampoo, soap, and other personal care products as well as surfactants and rinse water. After liquids were bulked, the empty poly drums and smaller containers were triple rinsed, cut in half if applicable and placed in a roll-off for disposal in accordance with local regulations as debris at a local approved landfill. Empty steel drums were triple rinsed and stacked on pallets within the warehouse. Davis Partners has since removed these drums. Seven on-site poly and steel manufacturing tanks as well as a poly tote were utilized to bulk liquids. An eighth on-site poly was observed to be fed by the incoming water line. It contained approximately 250 gallons of what appeared to be water. This material was grouped as part of the bulked liquids waste stream.

Drummed hazardous waste was staged in rows according to its identified hazard class via hazardous categorization or knowledge obtained from the MSDS. Waste streams were only staged near other compatible waste streams. The room located at the southeastern corner of the warehouse space was utilized to stage palletized bags of dry material mostly composed of bulk salts and silicates.

KEMRON removed the chemically stained plywood flooring that covered the central portion of the warehouse. This material was placed into a roll-off box for disposal in accordance with local regulations as debris at a local approved landfill.

KEMRON lab packed material deemed too dangerous to bulk due to its reactivity and/or toxicity. Laboratory grade oxidizing reagents, poisonous compounds including chlorinated solvents and pesticides, compressed gases and aerosols, and sodium

hydrosulfite were each lab packed into appropriately sized poly containers and staged in their appropriate waste streams.

A copy of KEMRON's drum log is included as Table 1. A copy of the packing slips for each lab packed drum is included as Appendix A.

2.2.2 Tanks, Totes and Process Pipe Decontamination

Existing tanks, totes and process piping were drained of material after hazardous categorization into the existing tanks segregated for bulking liquids. Empty tanks, totes and process pipe were decontaminated in accordance with the EPA Region IX Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM). Water generated from decontamination activities was captured and placed into the tanks segregated for bulk liquids.

Decontaminated stainless steel and poly tanks and poly totes were staged or left in place for the future sale or removal by Davis Partners. Decontaminated stainless steel process piping was staged in an onsite office for the future sale or removal by Davis Partners.

KEMRON observed overhead utility lines within the warehouse that were utilized for U.S. Colloidal's product processing equipment. Several PVC water lines were observed to emerge from the site's hot-water heater. These lines run overhead and were observed to feed into the top of several tanks and totes. KEMRON understands that these lines are still active. Electrical lines also power the motors to several of the stainless steel processing tanks. These utility lines pose no contaminant hazard and can remain onsite for future use. However, they may complicate the removal of the larger stainless steel tanks.

2.2.3 Sampling

Unknown, unlabelled, mis-labeled, and bulked material(s) were sampled and analyzed for ignitability, corrosivity, reactivity, and Toxic Characteristic Leaching Procedure (TCLP) by EPA Method 1311 for volatile organic compounds, semi-volatile organic compounds, pesticides, herbicides, and RCRA metals for disposal profiling. Drum sampling was conducted with disposable glass drum thieves, with the exception of drums that were less than half-full. In this case, a stainless steel 1L beaker was utilized to scoop material from the bottom of the drum. The beaker was then decontaminated with an Alkonox™ solution and triple rinsed before the next use. Samples were placed in clean laboratory supplied containers. A custody seal was applied, and the samples were placed on ice. Samples were delivered via courier and submitted to Test America of Irvine, California. Sampling was performed in accordance with the approved KEMRON FSP and QAPP. A copy of the chain of custody and laboratory analytical report is included as Appendix B. Table 1 correlates KEMRON's sample identification with the appropriate drum number, proper shipping name, and manifest number.

2.2.4 Demobilization

KEMRON demobilized the crew and equipment on May 30, 2008 after all process equipment had been cleaned and the waste materials had been safely staged in proper containers and ready for shipment. KEMRON arranged the profiling and shipment of the waste material prior to the remobilization of personnel to site to oversee disposal on August 6, 2008. After all waste material had been removed from the site on August 9, 2008, KEMRON completely demobilized equipment and personnel.

3.0 Subcontractors

KEMRON subcontracted Clean Harbors Environmental Services (Clean Harbors) of Wilmington, California to perform turnkey disposal service in accordance with DOT and Cal/EPA regulations.

3.1 Material Profiling and Labeling

KEMRON submitted all waste documentation prepared on-site and all laboratory analytical to Clean Harbors for the preparation of proper material profiles, labels, and manifests. Clean Harbors conducted a site visit on July 28, 2008 to verify documentation. Copies of waste profiles are included as Appendix C.

3.2 Transportation and Disposal

The transportation of waste was initiated on August 7, 2008. Shipment of waste from the subject site was completed on August 9, 2008. All waste material from the subject site was classified and shipped as either a Hazardous Waste or a Non-RCRA Hazardous Waste. Waste in transit on Saturday August 9th was received by the disposal facility on Monday August 11, 2008. All waste was received by the applicable disposal facility by September 9, 2008. Clean Harbors acted as the transporter of all waste and utilized their own disposal facilities in Buttonwillow, CA, Wilmington, CA, San Jose, CA, El Dorado, AR, and Deer Park, TX. The bulk liquids were accepted at Demenno Kerdoon in Compton, CA. Manifests and applicable disposal documentation are included as Appendix D

4.0 SUBMITTAL AND REPORTING REQUIREMENTS

4.1 Project Documentation

KEMRON is submitting this Completion Report as a final summary report. A project cost summary is included as Appendix E. Initial invoices have been received and are subject to KEMRON's approval. Challenges have been made to initial invoices regarding disposal. KEMRON is currently waiting for corrected invoices to be issued.

4.2 Project Closeout

A Final Completion Report will be submitted including final invoices as they are received by KEMRON. Any comments from the EPA and Davis Partners will be addressed for the Final Report to complete closeout of the EPA required response and closeout of the project.

FIGURES



© 2003 Tele Atlas
Streaming 100%
Winter 34.05 18.45 N 117.35.05 45 W elev. 1076 ft

US COLLOIDAL FACILITY

9330 7th St, Rancho Cucamonga, CA 91730

DRAWN BY: KG	DATE	28 APRIL 2008	
	REVIEWED BY:	R	PROJECT NO.
	APPROVED:	2	SE 4572-001-001
			DWG. FILE NO.
			SITE MAP

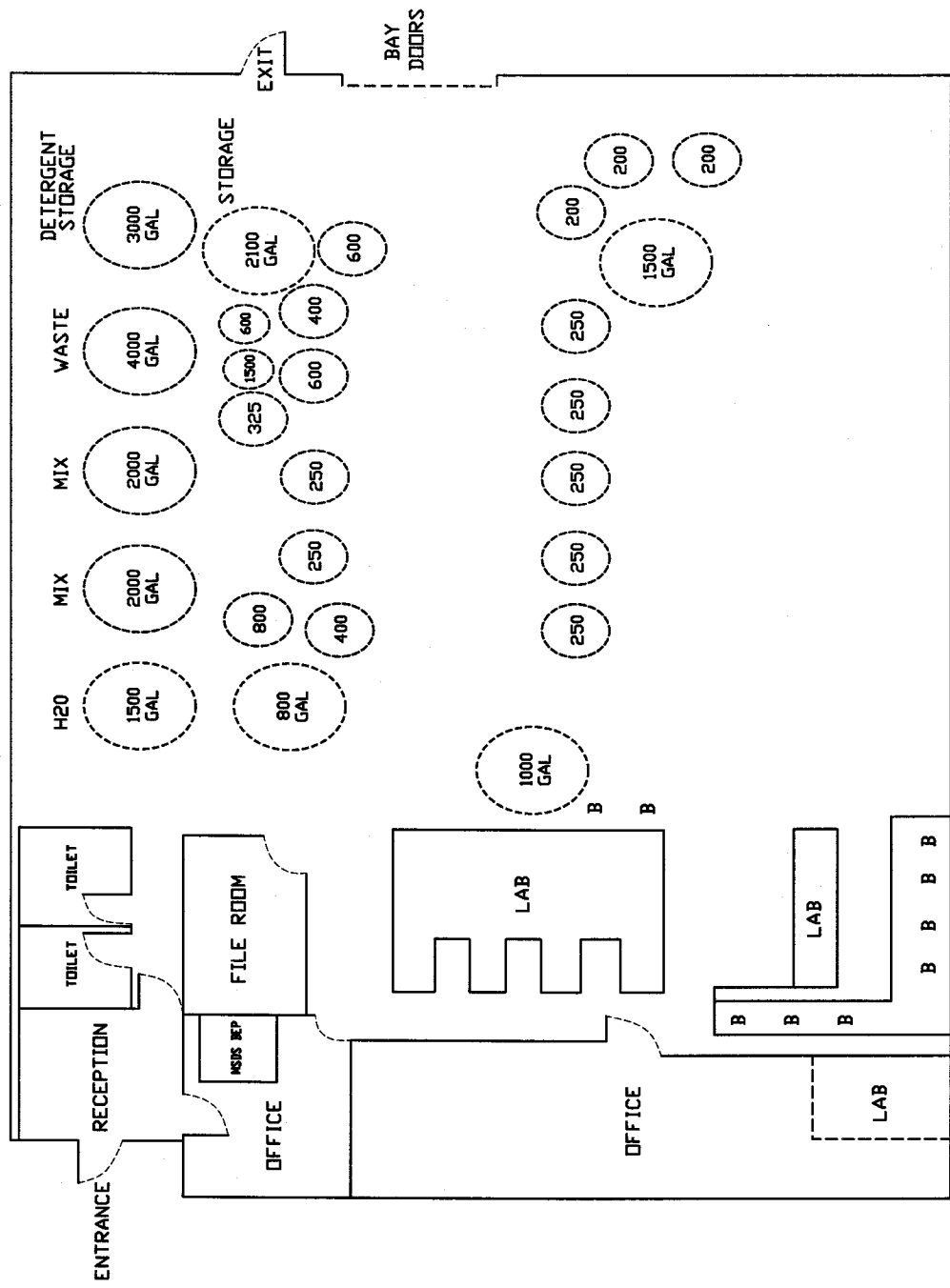
SITE LOCATION MAP
US COLLOIDAL FACILITY

FIGURE 1

9330 7th STREET
RANCHO CUCAMONGA, CA

KEMRON
ENVIRONMENTAL SERVICES

NOT TO SCALE



US COLLOIDAL
FACILITY MAP
9330 7th STREET
RANCHO CUCAMONGA, CA

FIGURE 2

DRAWN BY:	DATE
KG	28 APRIL 2008
REVIEWED:	PROJECT NO.
3	SE 4572-001-001
APPROVED:	DWG. FILE NO.
	FACILITY MAP

NOT TO SCALE



TABLES