Appendix E:
Phase I Environmental Site Assessment

THIS PAGE INTENTIONALLY LEFT BLANK

PHASE I
ENVIRONMENTAL ASSESSMENT REPORT

JULY 17, 2015

415 SOUTH HIGHLAND AVENUE (APN 032-181-18 & 20)
FULLERTON, CA 92832

PREPARED BY

ROBIN ENVIRONMENTAL MANAGEMENT (REM)
1015 VIA ROMALES
SAN DIMAS, CA 91773
(909) 592-3833

PROJECT NO. 240615

TABLE OF CONTENTS

TABLE OF CONTENTS (continued)

TABLE OF CONTENTS (continued)

1. INTRODUCTION

1.1 Objective

This report summarizes the results of a Phase I Environmental Site Assessment of the subject property performed by Robin Environmental Management (REM) in July 2015. The purpose of this Environmental Site Assessment is to evaluate the potential for environmental concerns or liabilities due to past and/or current land use practices at the subject site or from nearby properties. This assessment included in this report is solely targeted for CERCLA (Superfund) liability and the "innocent landowner defense", to permit user to satisfy one of the requirements to qualify for the innocent landowner defense to CERCLA liability, by conducting all appropriate inquiries to identify recognized environmental conditions (REC's).

1.2 Scope of Work

- Visual investigation of the property to obtain information regarding obvious visual signs of adverse environmental conditions, contamination, hazardous material usage, storage and handling on and in the adjoining sites (only up to one parcel next to the subject property) of the subject property

- Visual survey of the adjoining land uses (only up to one parcel next to the subject property) and determination of any current nearby operations which may potentially impact the subject site

- Government document search of records compiled by various government agencies for on site or nearby operations (past and present) to aid in the identification of any potential contamination sources

- Review of building permit records available at local agency and other pertinent documents to identify any potential past on-site operations which may have environmental implications.

2. PROPERTY DESCRIPTION

2.1 Geographical Description of Property

The subject site at 415 South Highland Avenue (APN 032-181-18 & 20) is a roughly E-W trending trapezoid-shaped lot located at the northeastern corner of (the N-S trending) Highland Avenue and (the generally E-W trending) Valencia Drive. The site is within a commercial zoning area in the city of Fullerton, California, as shown in Figure 1 (Site Photos), Figure 2 (Site Location Map), and Figure 3 (Recent Aerial Photograph Showing Site and Its Vicinity General Layout).

2.2 General Description of the Subject Property

The subject site at 415 South Highland Avenue (APN 032-181-18 & 20) is a roughly E-W trending trapezoid-shaped lot located at the northeastern corner of (the N-S trending) Highland Avenue and (the generally E-W trending) Valencia Drive in the city of Fullerton, California. The site consists of following two parcels (see Figure 3 for location/ configuration of each parcel):

APN 031-181-18 – A roughly “L”-shaped parcel at the northeastern corner of (the N-S trending) Highland Avenue and (the generally E-W trending) Valencia Drive, and engulfing the roughly E-W trending rectangular APN 031-181-20 (the other site parcel) to its northeast. The parcel consists mainly of a fenced roughly N-S trending rectangular-shaped asphalt-paved parking lot almost occupying the entire western arm of the roughly “L”-shaped parcel; a roughly trapezoid-shaped unpaved lawn yard in the eastern main portion of the southern arm of the roughly “L”-shaped parcel; and asphalt-paved parking lots/driveways for the carwash facility (occupying APN 031-181-20) in between above two parcel main features.

APN 031-181-20 (415 South Highland Avenue) - A roughly E-W trending rectangular parcel engulfed by APN 031-181-18 to its northeast; the parcel is generally improved with a single-story roughly N-S trending four-bay self-auto wash building occupying approximate its approximate east-central ¼; asphalt-paved driveways occupying approximate its eastern ¼ and its west-central ¼; and asphalt-paved parking spaces with self-auto interior vacuum cleaning devices in between spaces.

No pits, ponds, swamps, dry wells, or lagoons were observed on the subject property. No apparently significant surface staining was observed on the paved/unpaved out-door areas and the building area.

2.3 Present Tenants and Business Operation

At the time of site inspection on July 7, 2015, A to Z Ram Car Wash occupied APN 031-181-20 (415 South Highland Avenue) and also with its asphalt-paved parking lots/driveways in between fenced roughly N-S trending rectangular-shaped asphalt-paved parking lot almost occupying the entire western arm of the roughly "L"-shaped APN 031-181-20 and unpaved lawn yard in the eastern main portion of the southern arm of the roughly "L"-shaped APN 031-181-20. Current site business operations do not involve using/generating significant quantities of hazardous materials/wastes.

2.4 Past Tenants and Business Operation

Methods of researching historic use of ownership of the subject property employed by REM are as follows:

- City Building Permit Records
- Historic Aerial Photograph Records
- Historic City Directory Records

2.4.1 City Building Permit Records

REM's field inspector visited the City of Fullerton Building Department to review building permits pertaining to the subject site. Based on available building permit records, the site was developed into a carwash facility (currently remaining onsite) and its associated parking in 1965. From 1992 to 2002, there was also a Fullerton City Community Center (with 301 West Valencia Drive address) present in the southeastern portion (currently unpaved lawn yard) of the site.

2.4.2 Historic Aerial Photograph Records

Historic aerial photograph records included in Appendix B revealed that, in 1953, the site was occupied by farm house and its associated fruit groves. In 1963, the site was vacant lot. From prior to 1972 to at least 1980, the site was with currently on-site carwash structure and its associated parking. In 1995, there was also a structure (occupied by Fullerton City Community Center with 301 West Valencia Drive address; see Section 2.4.1) present in the southeastern portion of the site. By 2003, the site was generally with its current setting.

2.4.3 Historic City Directory Records

REM staff reviewed historic city directory records available at Sherman Library, Newport Beach, CA. There were no pre-middle 1940's city directory listings or site addresses. I the middle-late 1940's and the early-middle 1950's, residences with 423 S Highland Avenue address occupied the site. In the late 1950's and the early 1960's, the site was no city directory listings again. From 1965 on, site occupancy history revealed by available city directory records is consistent with findings from above other historic sources.

2.4.4 Site Development/Occupancy History Summary

Based on historic site occupancy data listed above, the site development history can be summarized as follow:

Prior to the middle 1940's - The site was apparently with no improvement structures
The middle 1940's to the middle 1950's – The site was occupied by farm house (with 423 S Highland Ave address) and its associated fruit groves
The late 1950's and the early 1960's – The was apparently vacant lot
1965 - The site was developed into a carwash facility (currently remaining onsite) and its associated parking
1965 to 1991 – The site was with a carwash facility (currently remaining onsite) and its associated parking
1992 to 2002 – In addition to a carwash facility (currently remaining onsite) and its associated parking, the site was also with a Fullerton City Community Center (with 301 West Valencia Drive address) present in the southeastern portion (currently unpaved lawn yard) of the site
2003 on – The site has been generally with its current setting

2.5 Regional Physical Setting

The subject property's physical locations were researched employing a United States Geological Survey (USGS) 7.5 Minute Topographic Quadrangle (Quad) Map relevant to the subject property. The USGS 7.5 Minute Quad Map has an approximate scale of 1 inch to 2,000 feet, and shows physical features with environmental significance such as wetlands, water bodies, roadways, mines, and buildings. Please refer to Appendix A, Figure 2.

The physical and natural features illustrated on the Quad Map served as areas of visual emphasis when conducting the site inspection of the subject property. The USGS 7.5 Minute Quad Map was used as the only Standard Physical Setting Source, and is sufficient as a single reference. The surface elevation of the subject site is approximately 150 feet above Mean Sea Level with topographic down gradient generally towards west-southwest.

2.6 Hydrogeological Information

Hydrogeologically, the site is located in the northern portion of the Orange County Groundwater Basin. Uppermost groundwater within the area is typically found under perched conditions at a depth of less than 120 feet. Sediments below the perched groundwater zone form an aquitard overlying the Talbert Aquifer. The principal groundwater producing aquifers within the area are generally found at depths of 300 to 1,500 feet.

Based on records available at the Orange Co. Water District, perched groundwater occurs at an approximate depth of 100 feet below grade and generally exhibits a flow direction towards southwest in the vicinity of the subject site.

2.7 Historical Hazardous Substance Usage

2.7.1 Records search sources

REM's field engineer contacted the following public agencies to find any records of former operation of underground storage tank (UST) of gasoline or any other hazardous substances on the subject site premise:

- City of Fullerton Building Department
- Orange County Health Care Agency
- Regional Water Quality Control Board – Santa Ana Region

No records were found in reference to historical usage or handling of UST on the subject property.

2.7.2 List and quantities of the hazardous materials

During the site inspection, the use, storage, and generation of any quantity of hazardous materials was not observed. No regulatory agency data was found regarding historic or present use of the subject property in regards to hazardous materials previously or

presently used, stored, treated, disposed or generated at the subject property.

REM staff also searched the State Department of Toxic Substances Control-compiled records site for all documented hazardous wastes disposal activities throughout California in the past at http://hwts.dtsc.ca.gov/report_list.cfm for site addresses and did not find any records.

2.7.3 Permits, licenses, and registrations

All present and past records of permits, licenses, registrations, certificates of environmental relation were searched. There is a permitted in-ground clarifier present within the north-central bay of the site carwash structure. REM staff further searched the South Coast Air Quality Management District (SCAQMD)-compiled Facility INformation Detail (FIND) database at www.aqmd.gov/webappl/fim/defualt.htm for site addresses and found no SCAQMD permit records for the site.

2.7.4 Violation or non-compliance notice

No violation or notice of non-compliance was issued with the present environmental regulations, according to the findings of our environmental assessment on the subject property.

2.7.5 Regulatory database record research

The subject property was not listed on the following environmental regulatory database record research (NETR records): NPL, RCRA-TSD, CERCLIS, NFRAP, RCRA-G, ERNS, CORRACTS, CORTESE, CALSITES, LUST, UST and SWF.

2.7.6 Environmental lien records

Under current environment regulation, government agency may place an environmental lien on the property with known contamination and no cleanup/mitigation activities apparently intended being conducted by the site owner upon the agency issued the cleanup enforcement order. The conducted government records search shows that there are no environmental liens placed by the federal environmental agency under CERCLA regulations for the subject site. REM staff searched the California State Dept. of Toxic Substances website EnviroStor data search and found no environmental liens were placed by the State environmental agency for the subject site. City of Fullerton records also show that there are no environmental liens placed by the local environmental agency for the subject site.

3. PROPERTY RECONNAISSANCE

REM's environmental assessor/geologist performed the field survey of the subject site and adjacent properties on July 7, 2015. A site location map and recent aerial photographs showing site and its vicinity general layout are included as Figure 2 and Figure 3, respectively.

3.1 Air Quality - Indoor and Visible Emissions

No unusual smells, obnoxious odors, or visual emissions were observed during the inspection of the subject property. No air emission stacks were present, thus no pertinent permits were searched for the previous records of violation history.

3.2 Asbestos-Containing Material (ACM)

Asbestos-containing building materials are normally found in the following items. REM inspected such materials as to the visual conditions and locations; however the actual sampling analysis is beyond the contracted scope of work, thus not included in the report.

Potential asbestos-containing building materials in general:

floor tile and associated mastic adhesive underneath the floor tile,
carpet mastic,
linoleum sheeting and associated backing material or leveling compound,
drywall joint compound or mud product,
plaster compound,
acoustic ceiling texture,
ceiling tile and associated mastic adhesive,
window putty or glazing,
roofing material (shingle, cap-sheet, etc.),
roofing penetration mastic,
transite panel or flue pipe,
fire-proofing material,
pipe insulation or wrapping, etc.

As discussed in section 2.4, it can be concluded that the site building was constructed in 1965 prior to the year of 1978 when commercial usage of friable ACM's was banned by federal government. However, based on the type (self auto wash) of the site building, the likelihood for friable ACM's (ACM's of concern) to be present on the

subject site building is minimal.

3.3 Lead-Based Paint (LBP)

As discussed in section 2.4, it can be concluded that all currently on-site building was constructed in 1965 prior to 1978 the year when lead-based paint in exterior and interior coating for commercial use was banned by federal government. Due to the dangers of lead poisoning, the Consumer Product Safety Commission banned the sale of lead-based paint (LBP), defined as containing more than 0.06% lead by weight, to consumers, and the use of LBP in residences and other areas where consumers have direct access to painted surfaces.

Effective June 3, 1993, the Lead in Construction Standard codified in 29 CFR (Code of Federal Regulations) 1926.62 applied to sources or potential sources of lead exposure in an "employment-related" context.

The trigger mechanism for application of the standard is an activity that, by its inherent nature, may cause exposure to lead. Therefore, within the context of regulatory compliance for OSHA (Occupation Safety and Health Agency), the subject property did not appear to require further response to suspect lead-based paint as no currently on-site activity by its inherent nature would cause exposure to lead.

However, prior to renovation, demolition, or any activity that will cause a disturbance of any suspect lead-based paint, sampling to determine lead content is recommended. In 1978, the federal government banned the use of lead-based paint in residential applications; however, usage in general industry continued at a decreased rate to the present. Lead-based paint presents a hazard through inhalation or ingestion of paint chips or vapor fumes. The greatest cumulative health threat is to young children, and for this reason the Department of Housing and Urban Development (HUD) has promulgated lead standards and survey requirements for buildings affected by HUD funding. This HUD regulation represents the only federal requirement for lead-based paint, hazard management applicable to privately-owned structures.

3.4 Polychlorinated Biphenyl (PCB's)

Prior to 1978, PCBs were commonly used in dielectric fluids in transformers, capacitors, and light ballasts due to their desirable thermal characteristics, and hydraulic fluid compactor. Due to their demonstrated toxicity and persistence in the environment, PCB manufacturing in the United States was discontinued.

Pole- and pad-mounted transformers were found in the vicinity of the subject site building, appearing in good condition without any sign of leakage. No PCB-containing hydraulic fluid trash compactor was discovered.

3.5 Underground Storage Tank (UST)

The visual inspection of the subject site revealed no evidence of surface or above ground (e.g., fill pipe, vent pipes, fill connections, concrete pads, saw cuts, sumps, spill containment device, leak detection device, etc.) features normally associated with underground storage tanks (UST's).

3.6 Aboveground Storage Tank

REM's field officer performed the visual inspection of the subject site to find no evidence of surface or above ground (e.g., fill pipe, vent pipes, fill connections, concrete pads, saw cuts, concrete pad, drains in vicinity, etc.) features normally associated with above-ground storage tanks (AST's) for petroleum products or other chemicals of concern.

3.7 Fuel Islands

The visual inspection of the subject site revealed no evidence of fuel islands or dispensers either in operation or abandoned.

3.8 Hydraulic Hoist Unit

The visual inspection of the subject site revealed no evidence of hydraulic hoist unit either in operation or abandoned.

3.9 Hazardous Materials / Petroleum Products Storage & Handling

No containers storing automotive or industrial batteries, pesticides, paints or seemingly toxic hazards at the time of site inspection. No significant oil or chemical staining was noticed.

3.10 Other Containers

No other containers indicating any sign of environmental concern were observed during the site inspection.

3.11 Hazardous Waste Treatment, Storage, Disposal (TSD)

No storage, treatment, or disposal of hazardous waste was found during the site investigation. No severely improper waste stream processing or disposal practices were observed on the subject property.

3.12 Distress Vegetation

Planters and vegetation in the vicinity of and within the subject site were found well maintained on bare soil or within separate planters in relatively good appearance with no sign of chemical stress or unnatural appearance.

3.13 Stockpiled Soils

REM's site inspection did not reveal any evidence of stockpiled soils on the ground of subject property.

3.14 Wastewater Treatment Unit / Clarifier

There is one in-ground clarifier present within the north-central bay of the carwash site structure. No oily sheen or dirty sludge was noticed present within the said clarifier.

Storm water drainage system in the close proximity of the subject area did not identify any abnormal accumulation of petroleum or chemical run-off or foreign materials. No unusual blockage of the storm-water control system was observed during the site visual investigation on the outdoor parking lot or surface areas. REM recommends no additional investigation on described storm-water systems at the subject property.

3.15 Solid Waste Disposal

No improper activities of treatment or disposal of hazardous, medical, or toxic wastes are performed on the subject site.

Concrete/asphalt pavement surfaces appeared to serve as impermeable structure where no major cracks or crevices were found in the areas of solid waste disposal and handling.

3.16 Wells

REM's site walk-through did not discover any irrigation wells, injection wells, abandoned wells, groundwater-monitoring wells, dry wells, septic wells oil wells, gas wells, domestic

water wells, other-monitoring wells on the subject premises.

3.17 Underground Pipelines

REM's site inspection did not reveal any evidence of underground pipelines beneath the ground of subject property, other than public utility lines such as sewer, power, and electric lines, for which public "dig-alert" service would easily identify upon 48-hour telephone notice in advance.

3.18 Boilers & HVAC Systems

The subject site building is with no water heater and HVAC system.

3.19 Visual Indication of Spills, Leakage, Staining

REM's site inspection did not reveal any evidence of on-site or off-site spills, leakages, or staining significant enough to pose immediate environmental concern onto the subject property. No significantly stained catch basins, drip pads, or sumps were observed. There were no major spills around surface drains, pipes, gutters, spouts, or tubes, if any, at the time of site investigation.

3.20 Soil Staining or Surface Staining on Unpaved/Natural Lands

No staining or surface staining on the bare soil or unpaved lands were identified during the site investigation.

3.21 Pits, Ponds, Lagoons

No visible evidence of wetlands such as pits, ponds, lagoons, or any other water bodies were observed within the subject property's boundary lines.

3.22 Herbicides/Pesticides

Based on information presented in Section 2.4, from the middle 1940's to the middle 1950's, the site was occupied by farm house (with 423 S Highland Ave address) and its associated fruit groves. According to REM's past experience with subsurface investigations conducted on land with agricultural usage, typical pesticide concentrations detected in soil samples pose no significant risk, i.e., a risk that results in one excess cancer risk in an exposed population of 1,000,000 for commercial, industrial, and residential exposures.

3.23 Radon

Radon sources can be found from earth and rock beneath building structures, well water, and building materials themselves. Though there is no immediate health effect, it is believed to account for approximately 10% of lung cancer deaths in the United States. Estimated national average is 1.5 picocuries per liter of air, however, levels as high as 200 picocuries per liter in some commercial buildings can be found. USEPA and California Department of Health Services' Radon Survey Interim Results report shows different U.S. regions according to general geological and climate information, where Region 9 includes Imperial, Los Angeles, Orange, Riverside, San Bernardino and San Diego Counties.

According to the California EPA, Los Angeles and Riverside County is classified as a "Zone 2" county having a predicted average screening level between 2-4 picocuries per liter of air. Orange and San Diego County is under Zone 3, having the level less than 2 picocuries/L, and Ventura County as Zone 1 has the level greater than 4 picocuries/L.

If a property region reportedly has radon concentration below 4 picocuries per liter of air in 99.5% of homes within the region, then, it is not likely impacted by the presence of radon gas, considering EPA action limit of 4 picocuries per liter of air volume. REM is not contracted to perform the testing of radon level on the subject property, thus the delineation of radon level is beyond the scope of the service and also not deemed essential based on the commercial setting of the subject site, and hence not included in this report.

4. NEIGHBORING PROPERTIES

4.1 Adjacent/Adjoining Businesses

For the scope of this assessment, properties are defined and categorized based upon their physical proximity to the subject property. An adjoining property is any real estate property whose border is contiguous or partially contiguous with the subject properties, or that would be if the properties were not separated by a roadway, street, public thoroughfare, river, or stream.

The subject site is bordered by following adjoining properties:

North: Immediately by asphalt-paved alley, and then by, from east to west, Feliz Market (407 South Highland Avenue), vacant lot, and residence

East: Immediately by Highland Avenue, and then by residences

South: Immediately by Valencia Drive, and then by Taqueria De Anda restaurant

West: By apartments

4.2 Historical Hazardous Substance Usage in Neighboring Properties

REM's field engineer contacted the following public agencies to find any records of former operation of gasoline UST or any other hazardous substances in the vicinity of the subject site premise.

- City of Fullerton Fire Dept. (CFFD)
- Regional Water Quality Control Board – Santa Ana Region

The conducted government records search identifies that Deanda Property (former Signal gas station with 300 W Valencia Drive address and located, across Valencia Drive, to the south of the subject property) is listed on Leaking Underground Storage Tank (LUST)/Spills facilities database with an "Open" status. Based on records available at above agencies, in 1986, 1991, and 2/1992, three phases (with borings B-1 to B-4 advanced in 1986, borings B-5 to B-9 advanced in 1991, and borings B-10 to B-13 advanced in 2/1992) of subsurface investigations were conducted on the 300 W Valencia Dr. site. Locations of these borings and analytical results of soil samples collected from them are presented on Figure included in Appendix C. Based on

analytical results presented on the Figure, identified subsurface contamination derived from UST leakage of the 300 W Valencia Drive site is limited to the said site itself and did not induce impact to the subsurface environment of its neighborhood.

On 3/9/1992, the CFFD issued a letter directive (copy also included in Appendix C) stating that “the extent of contamination (at the 300 W Valencia Dr. site) has been sufficiently defined” and required owners (Ms. and Mr. De Anda) of the 300 W Valencia Dr. site to submit remedial action plan for the identified soil contamination. As of today, Ms. and Mr. De Anda have not performed the required action (remedial action plan submittal) listed on the 3/9/1992 letter directive issued by the CFFD.

In summary, no locations in the neighborhood within close proximity are considered to pose any environmental threat to the subject property, based upon data obtained via NETR governmental records database and the conducted agency records search.

5. GOVERNMENT RECORDS SEARCH AND POTENTIAL OFF-SITE CONTAMINATION SOURCES

5.1 Historical Background and Scope of Coverage

Since the early 1970s, environmental agencies have been tracking the compliance of many facilities with the various laws that have been promulgated to halt the pollution of air, land and water. More recently, records have been maintained documenting spills of hazardous materials and the locations of known waste sites or regulated waste handling facilities. The following sections summarizes REM's review of database search of available records at the local, state and federal level and highlights the approximate location of such sites with respect to the subject property.

The conducted government record search was performed to aid:

1) Identification of facilities, located within a one-mile radius of the subject property, which might pose a potential threat to the subsurface environment at the subject property; and

2) Identification of any environmental violation notices associated with activities conducted at the subject property itself. The following lists were reviewed for sites within one mile of the property:

5.2 Database Sources

A. Federal Sources

- United States Environmental Protection Agency (U.S. EPA), Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)
- U.S. EPA, National Priority List (NPL)
- Resource Conservation and Recovery Act (RCRA) Federal TSD Facilities
- Federal Emergency Response Notification System (ERNS)
- CERCLA Site Enforcement Tracking System
- RCRA Violators List (CORRACTS)
- U.S. EPA Federal Enforcement Docket
- Toxic Release Inventory System (TRIS)
- No Further Remedial Action Planned (NFRAP)

The CERCLIS is the EPA compilation of sites for which the EPA has evidence of, or is investigating, a release or threatened release, of hazardous substances which may be subject to review in accordance with the terms and conditions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (Superfund Act). Sites to be included are identified primarily by the reporting requirements of hazardous substances including degreasing solvents, oily waste, acid solutions, alkaline solutions, and heavy metal solutions, Treatment, Storage and Disposal (TSD) facilities and releases larger than specific Reportable Quantities (RQ), established by EPA.

An NPL site is an uncontrolled or abandoned hazardous waste site identified for priority remedial action under Superfund Program. Such prioritized sites with significant risk to human health and the environment receive remedial funding under the Comprehensive Environmental Response Conservation and Liability Act (CERCLA).

RCRA generator/TSD list is a compilation of hazardous waste generating facilities which have obtained an identification number from EPA.

ERNS database is a national computer database used to store information on unauthorized release of oil and hazardous substances. The program is a cooperative effort of the Environmental Protection Agency, the Department of Transportation Research and Special Program Administration's National Transportation System Center and the National Response Center. There are primarily five Federal statues that requires release reporting: CERCLA Section 103; the Superfund Amendments and Reauthorization Act (SARA) Title III Section 304; the Clean Water Act of 1972 (CWA) Section 311(b)(3); and the Hazardous Material Transportation Act of 1974 (HMTA) Section 1808 (b).

RCRA Violators List (CORRACTS): The Resource Conservation and Recovery Act of 1976 provides for "Cradle to Grave" regulation of hazardous wastes. RCRA requires regulation of hazardous waste generators, transporters, and TSD sites. Evaluation to potential violations, ranging from manifest requirements to hazardous waste discharges, is typically conducted by the US EPA. This database is also known as Corrective Action Report (CORRACTS).

Toxic Release Inventory System (TRIS): TRIS compiles database for a property having had a release of chemical compound, whose listing reflects permitted air releases rather than a release to soil or groundwater.

B. California State Sources

- State of California Office of Planning and Research (CORTESE), the State of California equivalent of CERCLIS
- Leaking Underground Storage Tanks (LUST)
- Solid Waste Information System (SWIS)
- Annual Work Plan (previously known as Bond Expenditure Plan), the State of California equivalent of NPL
- California Historical Abandoned Site Survey Program (CALSITES)

CALSITES: The Historical Abandoned Site Survey (HASS) Program, formerly the California Abandoned Sites Program Information System – ASPIS, identified certain potential hazardous waste sites. The identification of these sites was generally not made via sampling and site characterization, but as a result of

file searches and windshield surveys.

No Further Action sites are also on the CALSITE list which has been marked for no further action by the California Environmental Protection Agency, Department of Toxic Substance Control (DTSC) in accordance with California Health & Safety Code.

CORTESE: This database is a consolidation of information from various sources. It is maintained by the State Office of Planning and Research and lists potential and confirmed hazardous waste or substances sites.

LUST(s): The Leaking Underground Storage Tanks (LUST) Information System is maintained by the State Water Resource Board pursuant to California Health & Safety Code.

SWIS (Solid Waste Information System): As legislated under Solid Waste Management and Resource Recovery Act of 1972, the California Waste Management Board maintains list of certain facilities, i.e. Active solid waste disposal sites, Inactive or Closed solid waste disposal sites and Transfer facilities.

AW (Annual Work Plan previously known as Bond Expenditure Plan): The California Health & Safety code requires the California EPA to develop a site-specific expenditure plan as the basis for an appropriation of California Hazardous Substance Cleanup Bond Act of 1984 funds. The Agency is also required to update annually and report any significant adjustments to the Legislature on an ongoing basis. The plan identifies California hazardous waste sites targeted for cleanup by responsible parties, the California and the Federal Environmental Protection Agency over the next coming years.

C. Regional Sources

- LUST - Regional
- Toxic Releases (NT)
- Toxic Pits (TPC)
- California Regional Water Resources Control Board, Solid Waste Assessment Test (SWAT)
- Well Investigation Program

NT (Toxic Releases): The California Regional Water Quality Control Boards or local Department of Health & Safety Services keeps track of toxic releases to the environment. These lists are known as Unauthorized Releases, Spill, Leaks, Investigation and Cleanups, Non-Tank Releases, Toxic List or similar, depending on the local agency

TPC (Toxic Pits): The Toxic Pits Cleanup Act places strict limitations on the discharge of liquid hazardous wastes into surface impoundment, toxic ponds, pits and lagoons. Regional Water Quality Control Boards are required to inspect all surface impoundments annually; in addition, every facility was required to file a Hydrogeological Assessment Report. Recent legislation allows the Department of Health Services to exempt facilities that closed on or before December 31, 1985, if a showing is made that no significant environmental risk remains.

SWAT (Solid Waste Assessment Test): This program requires that disposal sites with more than 50,000 cubic yards of waste provide sufficient information to the regional water quality control board to determine

whether or not the site has discharged hazardous substances which will impact the environment. Site operators are required to file Solid Waste Assessment Test reports on a staggered basis. Operators submit water quality tests to the Regional Water Quality Control Board, describing surface and groundwater quality and supply; and the geology within 1 mile of the site. Air quality tests are submitted to the local Air Quality Management District or Air Pollution Control District.

D. Other Sources

- RCRA-Generator
- RCRA-TSD Facilities
- SWLF (Solid Waste Landfill)
- Water Wells (USGS)

RCRA-G: The EPA regulates generators of hazardous material through the Resource Conservation and Recovery Act (RCRA). All hazardous waste generators are required to notify EPA of their existence by submitting the Federal Notification of Regulated Waste Activity Form or a State equivalent form. The notification form provides basic identification information and specific waste activities.

RCRA-D: The EPA regulates the treatment, storage and disposal of hazardous material through the Resource Conservation and Recovery Act (RCRA). All hazardous waste TSD facilities are required to notify EPA of their existence by submitting the Federal Notification of Regulated Waste Activity Form or a State equivalent form.

SWLF: The California Waste Information system database consists of both open as well closed and inactive solid waste disposal facilities and transfer stations pursuant to the Solid Waste Management and Resource Recovery Act of 1972. Generally the California Integrated Waste Management Board learns of locations of disposal facilities through permit applications and from local enforcement agencies.

Water Wells: The Groundwater Site Inventory (GWSI) database was provided by the United States Geological Survey (USGS), which contains information over 1,000,000 wells and other groundwater which the USGS has studied, used or otherwise had reason to document through the course of research.

5.3 Case Study References

A. Case-Closure

If sites are listed on the California Leaking Underground Storage Tank (LUST) database with a "case closed (no further remedial actions required)" status, it shall be interpreted as follows. The identified contamination at such sites was mitigated to a degree that the governing agency believed that these sites do not pose apparent concern/threat to the subsurface environment of the neighboring area.

B. Lawrence Livermore National Laboratory Reports on LUFT's

According to Lawrence Livermore National Laboratory/University of California Reports on Leaking Underground Fuel Tanks (LUFT's), approximately ninety percent of dissolved petroleum products are found less than 280 feet in distance from the origination source, and most of these plumes are either stable or decreasing in distance. And seventy percent of the plume is in shallow groundwater less than 25 feet below the ground surface.

C. Groundwater Flow Gradient

Environmentally-concerned sites located not directly at the up-gradient from the subject site can be deleted from anticipated target sites, since contamination from identified sites is unlikely to migrate along the groundwater flow direction to affect the subsurface environment underneath the subject site (Section 2.6 – Hydrogeologic Setting).

5.4 Potential Source of Contamination

Sites identified on referenced agency listing within the one-mile radius from the subject property are tabulated in the Appendix D of this Report. Appendix D shows that there is only on open Leaking Underground Storage Tank (LUST)/Spills sites (300 W Valencia Drive site located, across Valencia Drive, to the south of the subject property) within the immediate vicinity (< 1/8 mile) of the subject site being identified as of potentially environmental concern. Discussions on the open 300 W Valencia Drive LUST/Spills site are presented in Section 4.2.

5.5 UST, Disposal Sites, and Generators

As also shown in Appendix D, there are three sites listed on RCRA small quantities hazardous waste generators list, and five sites listed on Underground Storage Tank (UST) database compiled by the State Water Resources Control Board, located within 1/8-mile radius of the subject site. Upon reviewing the information regarding the said facilities obtained via computer search, the conclusion was drawn that the subsurface environment at the subject site is not likely to have been impacted by operations of the said facilities.

6. CONCLUSIONS AND RECOMMENDATIONS

- As a result of the site reconnaissance, records research, historical investigation, and review of federal, state, and local reported environmental information, this assessment identified no evidence of recognized environmental conditions that could significantly impact the subject property, and there is no apparently significant environmental concern induced by the present or past operations and practices at the subject property and its immediate neighbors.

- The subject site at 415 South Highland Avenue (APN 032-181-18 & 20) is a roughly E-W trending trapezoid-shaped lot located at the northeastern corner of (the N-S trending) Highland Avenue and (the generally E-W trending) Valencia Drive in the city of Fullerton, California. The site consists of following two parcels (see Figure 3 for location/ configuration of each parcel):

  APN 031-181-18 – A roughly "L"-shaped parcel at the northeastern corner of (the N-S trending) Highland Avenue and (the generally E-W trending) Valencia Drive, and engulfing the roughly E-W trending rectangular APN 031-181-20 (the other site parcel) to its northeast. The parcel consists mainly of a fenced roughly N-S trending rectangular-shaped asphalt-paved parking lot almost occupying the entire western arm of the roughly "L"-shaped parcel; a roughly trapezoid-shaped unpaved lawn yard in the eastern main portion of the southern arm of the roughly "L"-shaped parcel; and asphalt-paved parking lots/driveways for the carwash facility (occupying APN 031-181-20) in between above two parcel main features.

  APN 031-181-20 (415 South Highland Avenue) - A roughly E-W trending rectangular parcel engulfed by APN 031-181-18 to its northeast; the parcel is generally improved with a single-story roughly N-S trending four-bay self-auto wash building occupying approximate its approximate east-central ¼; asphalt-paved driveways occupying approximate its eastern ¼ and its west-central ¼; and asphalt-paved parking spaces with self-auto interior vacuum cleaning devices in between spaces.

  No pits, ponds, swamps, dry wells, or lagoons were observed on the subject property. No apparently significant surface staining was observed on the paved/unpaved out-door areas and the building area.

  At the time of site inspection on July 7, 2015, A to Z Ram Car Wash occupied APN 031-181-20 (415 South Highland Avenue) and also with its asphalt-paved parking lots/driveways in between fenced roughly N-S trending rectangular-shaped asphalt-

paved parking lot almost occupying the entire western arm of the roughly "L"-shaped APN 031-181-20 and unpaved lawn yard in the eastern main portion of the southern arm of the roughly "L"-shaped APN 031-181-20. Current site business operations do not involve using/generating significant quantities of hazardous materials/wastes.

- Based on historic site occupancy data listed in Section 2.4, the site development history can be summarized as follow:

  Prior to the middle 1940's - The site was apparently with no improvement structures
  The middle 1940's to the middle 1950's – The site was occupied by farm house (with 423 S Highland Ave address) and its associated fruit groves
  The late 1950's and the early 1960's – The was apparently vacant lot
  1965 - The site was developed into a carwash facility (currently remaining onsite) and its associated parking
  1965 to 1991 – The site was with a carwash facility (currently remaining onsite) and its associated parking
  1992 to 2002 – In addition to a carwash facility (currently remaining onsite) and its associated parking, the site was also with a Fullerton City Community Center (with 301 West Valencia Drive address) present in the southeastern portion (currently unpaved lawn yard) of the site
  2003 on – The site has been generally with its current setting

  As presented, from the middle 1940's to the middle 1950's, the site was occupied by farm house (with 423 S Highland Ave address) and its associated fruit groves. According to REM's past experience with subsurface investigations conducted on land with agricultural usage, typical pesticide concentrations detected in soil samples pose no significant risk, i.e., a risk that results in one excess cancer risk in an exposed population of 1,000,000 for commercial, industrial, and residential exposures.

- According to the conducted government records search, the subject property is not listed on the following environmental regulatory database record research (NETR database): NPL, RCRA-TSD, CERCLIS, NFRAP, RCRA-G, ERNS, CORRACTS, CORTESE, CALSITES, LUST, UST and SWF.

- The conducted government records search identifies that Deanda Property (former Signal gas station with 300 W Valencia Drive address and located, across Valencia Drive, to the south of the subject property) is listed on Leaking Underground Storage Tank (LUST)/Spills facilities database with an "Open" status. Based on records available at above agencies, in the past, three phases (with borings B-1 to

B-4 advanced in 1986, borings B-5 to B-9 advanced in 1991, and borings B-10 to B-13 advanced in 2/1992) of subsurface investigations were conducted on the 300 W Valencia Dr. site. Locations of these borings and analytical results of soil samples collected from them are presented on Figure included in Appendix C. Based on analytical results presented on the Figure, identified subsurface contamination derived from UST leakage of the 300 W Valencia Drive site is limited to the said site itself and did not induce impact to the subsurface environment of its neighborhood.

On 3/9/1992, the CFFD issued a letter directive (copy also included in Appendix C) stating that "the extent of contamination (at the 300 W Valencia Dr. site) has been sufficiently defined" and required owners (Ms. and Mr. De Anda) of the 300 W Valencia Dr. site to submit remedial action plan for the identified soil contamination. As of today, Ms. and Mr. De Anda have not performed the required action (remedial action plan submittal) listed on the 3/9/1992 letter directive issued by the CFFD.

In summary, no locations in the neighborhood within close proximity are considered to pose any environmental threat to the subject property, based upon data obtained via NETR governmental records database and the conducted agency records search.

- Based on the conducted government records search, there is only on open Leaking Underground Storage Tank (LUST)/Spills sites (300 W Valencia Drive site located, across Valencia Drive, to the south of the subject property) within the immediate vicinity (< 1/8 mile) of the subject site being identified as of potentially environmental concern. Discussions on the open 300 W Valencia Drive LUST/Spills site are presented above.

- In conclusion, we have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E-1527-13 of 415 South Highland Avenue, Fullerton, CA, the property. As a result of the site reconnaissance, review of federal, state, local reported environmental information regarding the said facilities obtained via computer search, this assessment identified the risk of contamination at the property as so minimal that no further investigation is warranted.

7. LIMITATIONS AND CERTIFICATION STAMP

The opinion expressed herein is based on the information collected during our study, our present understanding of the site conditions and our professional judgment in light of such information at the time of preparation of this opinion. The report is a professional opinion work, and no warranty is either expressed, implied or made as to the conclusions, advice and recommendations offered in this report.

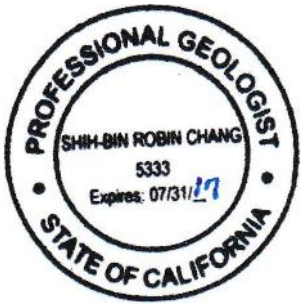
Our investigation was performed using the degree of care and skill ordinarily exercised, under similar circumstances, by reputable Engineers and Geologists practicing in this or similar localities.

The findings, conclusions and recommendations in this report are considered valid as of the present date. However, changes in the conditions of the property can occur with the passage of time, due to natural process or the works of man on this or adjacent properties. In addition, changes in applicable or appropriate standard may occur. REM is not responsible for conditions found at or beneath the subject property or adjacent properties. Accordingly, portions of this report may be invalidated wholly or partially by the changes beyond our control.

This report is prepared for the exclusive use of the client, and opinions/ recommendations contained in this report apply only to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated.

Report Prepared by:
ROBIN ENVIRONMENTAL MANAGEMENT

Robin Chang

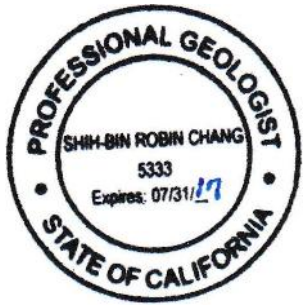


Robin Chang, Ph.D., P.G.
Project Manager

8. QUALIFICATION STATEMENT FOR PERSONNEL CONDUCTING THE PHASE I ASSESSMENT

Since Robin Chang, the personnel conducting the Phase I Environmental assessment is a California State Registered Professional Geologist, Robin Chang declares that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Sec. 312.10 of 40 CFR. I have the specific qualifications based on education, training, experience, and license to assess a property of the nature, history, and setting of the subject property. I have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

ROBIN ENVIRONMENTAL MANAGEMENT



Robin Chang, Ph.D., P.G.
Project Manager

APPENDICES

APPENDIX A

FIGURES & PHOTOS

FIGURE 1

SITE PHOTOS

Photo 1
Viewing the site from its southeastern corner; facing northwest)

Photo 2
Viewing APN 031-181-20 (415 South Highland Avenue) from its northeastern corner; facing southeast

Photo 3

From right to left (from east to west), Feliz Market (407 South Highland Avenue), vacant lot (indicated by arrow), and residence, across asphalt-paved alley to the north of the site (facing west-northwest)

Photo 4

Residence, across Highland Avenue, to the east of the site (facing northeast)

Photo 5
Taqueria De Anda restaurant, across Valencia Dr., to the south of the site (facing west-southwest)

Photo 6
Apartments to the west of the subject site (facing north-northwest)