

**APPENDIX F1**  
**PHASE I ESA**



# **Phase I Environmental Site Assessment and Limited Phase II Environmental Site Investigation**

**Moreno Valley  
14044 Old 215 Frontage Road  
Moreno Valley, California**

Penske

July 09, 2021

# Executive Summary

GHD was retained by Penske Truck Leasing (Peske) to complete a Phase I Environmental Site Assessment (Phase I ESA) and Limited Phase II Environmental Site Investigation (Phase II ESI) of the CD Moreno Holding, LLC property located at 14044 Old 215 Frontage Road in Moreno Valley, California (Site). Penske is considering acquisition of the Site. The purpose of the Phase I ESA portion of this assessment is to identify recognized environmental conditions (RECs), as defined in ASTM International (ASTM) Standard E1527-13 (the Standard), at the Site. This Phase I ESA was conducted to assist Penske in conducting all appropriate inquiries into previous ownership and use of the Site to qualify for specific landowner liability protections under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and to evaluate business environmental risk (BER), as defined in the Standard, for the Site. The Phase I ESA Site reconnaissance was conducted by GHD on May 26, 2021.

The Site is developed with a small wooden shed on the northeastern border located on approximately 9.6 acres. The Site is located on the western portion of an undeveloped, irregularly shaped lot totaling approximately 19.36 acres of land (Property). The remainder of the Site is unpaved with sparse areas of vegetation. A portion of the Site is used for tractor trailer storage. A soil and debris stockpile is located on the southeastern corner of the Site. Based on the review of historical aerial photographs, the northwestern portion of the Site was previously occupied by several commercial/industrial buildings from at least 1949 until at least 1998. The remaining portions of the Site were undeveloped land or were used for parking and/or equipment storage from at least 1949 until at least 1989. Prior to 1949, the Site was undeveloped vegetated land from at least 1938.

Business operations currently conducted at the Site by CD Moreno Holding, LLC consist of tractor trailer storage.

The purpose of the Limited Phase II ESI portion of this assessment is to evaluate potential environmental concerns identified during the Phase I ESA. The Limited Phase II ESA was conducted under the guidance of a GHD California licensed professional geologist.

## Findings and opinion

Based on the Phase I ESA and Limited Phase II ESI, the following findings were identified with the Site:

- 1. Potential Agricultural Chemical Impacts from Historical Applications:** Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have historically been used on the Site. Information regarding historical use, storage or application rates is not reasonably ascertainable. No information was found to suggest that agricultural chemicals were not applied in accordance with manufacturer recommendations. Application of agricultural chemicals for intended use in accordance with manufacturer's recommendations is not considered a release; therefore, potential residuals, if any, do not constitute a REC. It should be noted that the potential presence of agricultural chemicals may have resulted in Site impairment that may have or could result in adverse impact to Site soil and groundwater and consideration should be given to the potential presence of these chemicals and possible impacts therefrom when evaluating BER and future land use of the Site.
- 2. Historical On-Site Structures:** Based on a review of historical documents, commercial or industrial buildings historically were located on the northwest portion of the Site. Based on the review of city directories, the Site was occupied by: Sundial Camper in 1976 and 1980; Tractorland between 1992 and 2017; Mark Gorin & Associate (auctioneers) and Parts West in 1995 and 1995; P&D Equipment RPR and South CST Portable in 1992; Tec Storage in 1995; Yucaipa Towing in 2014; and C5 Equipment Rentals in 2017. Specific information regarding the operations conducted by these entities was not reasonably ascertainable. No information was available regarding demolition of the structures, potential USTs, potential ASTs, water supply, chemical use/storage, solid waste generation, or potentially hazardous waste generation. No evidence was found to suggest a release of hazardous substances or petroleum products associated with activities conducted at the former structure has occurred, nor was any evidence found that operations conducted at the former structure have impacted soil and groundwater at the Site. The mere presence of an historical structure on the Site does not constitute a REC. Based on the

absence of information pertaining to the demolition of the buildings, it is possible that remnants may remain in the subsurface which should be considered when evaluating BER and future land use of the Site.

3. **Abandoned Crude Oil Pipeline:** The Site has an underground pipeline that runs from west to east through the central portion of the Site. The line was formerly operated by ARCO Four Corners as a crude oil pipeline from approximately the 1960s to 1999. It was deactivated using nitrogen in 2001. No other information pertaining to the pipeline (i.e., owner, age, releases) was available for GHD's review, nor was any information found to suggest that any releases from the pipeline occurred on or near the Site. The mere presence of a crude oil pipeline on the Site does not constitute a REC. The presence of the oil/gas pipeline should be considered when evaluating BER and future land use of the Site.
4. **On-Site Groundwater and Soil Vapor Impacts:** A former dry cleaner reportedly operated in a building adjoining the Site to the northeast in the 1950s or 1960s. Details of the business are unknown. Chlorinated VOCs have been detected in soil, groundwater and soil vapor samples collected during previous investigations in the vicinity of the former dry cleaner on the adjoining properties and the Site. Analytical results from GHD's Limited Phase II ESI on the Site indicate that PCE and TPHg were detected in groundwater samples, and PCE, chloroform, and benzene were detected in soil vapor samples at concentrations exceeding the ESLs. The presence of these compounds in groundwater and soil vapor at the Site represents a REC.
5. **March AFB:** March AFB is located within 0.5-miles south of the Site and was listed on the National Priority List (Superfund) in 1989. Investigation of this Superfund site is ongoing, but TCE, PCE, and cis-1,2-dichloroethene have been detected in monitoring wells on the AFB at levels that exceed California drinking water standards. This site is listed on NPL, SEMS, US ENG CONTROLS, US INST CONTROLS, ROD, PRP, and RCRA-LQG databases, the boundaries of which include the Site in the EDR Radius map report. According to the U.S. EPA website, *"The 7,123-acre March Air Force Base (AFB) has been used for aircraft maintenance and repair, refueling operations, and training activities since 1918. Facility operations contaminated soil and groundwater with hazardous chemicals. Three zones of groundwater contamination beneath the base were identified and wells on base were shut down in the late 1980s and were later properly destroyed. Groundwater contamination has migrated to wells located off base that are no longer in use. However, a groundwater containment system has been installed to prevent off-site groundwater migration and the off-site plume is being monitored. The site's long-term cleanup is ongoing."* The U.S. EPA website also indicated that *"Operation of the Groundwater Extraction and Treatment System (GETS) began in April 1992. In September 1996, the GETS was initially expanded as the Enhanced Groundwater Extraction System (EGETS) to include 14 extraction wells and five injection wells. During December 2019, drilling and well installation for six new extraction wells for the EGETS2 expansion began and it became operational in July 2020."* Information regarding the locations of the wells or groundwater flow was not included on the U.S. EPA website; however, the 2018 Roux report indicated that regional groundwater flow is to the southeast. Information regarding potential soil gas impacts was not provided on the U.S. EPA website. The website also indicated *"Most of the sites either have been cleaned up or determined that no clean up was needed. One landfill was capped (Site 4) and other landfill material was moved to a properly constructed landfill (Site 6). A groundwater interdiction system at the base boundary (EGETS) is operating. The groundwater plumes are generally shrinking. A Soil Vapor Extraction system is removing contaminants from Site 7. Emerging contaminants, perfluorinated compounds including PFOA/PFOS, are being investigated in soil and groundwater."* Site personnel were unaware of any reported impacts to the Site from the March AFB property. Based on the location of the March AFB to the Site and regional groundwater flow direction, the likely impacts to the Site constitute a REC. The March AFB is located to the southwest of the Site and regional groundwater flow is reportedly to the southeast; however, the extent of the plume associated with the March AFB could not be confirmed at the time of this Phase I ESA, which represents a significant data gap.
6. **Historical Site Operations:** The Site was used by an auction company for storage of heavy equipment and also for tractor and parts sales. No staining or obvious evidence of a release to the environment was noted in the observable portions of the surface soil during the Site reconnaissance. No reasonably ascertainable documentation was found to suggest that the former operations at the Site have caused any hazardous substances or petroleum products to impact the Site and the Site is not listed in the databases searched as having any releases to the environment. The mere presence of the Site usage for large equipment storage/sales not constitute a REC. However, based on these historical operations, the potential for hazardous substances or petroleum products in the material should be considered when evaluating BER and future land use of the Site.

7. **Historical Staining:** Extensive areas of soil staining were observed during the 2003 Phase I ESA but not during a 2006 Phase I ESA site reconnaissance. No documentation was reasonably ascertainable to demonstrate the observed staining had been evaluated or remediated. No staining or obvious evidence of a release to the environment was noted in the observable portions of the surface soil during the Site reconnaissance. The presence of historical stained soil constitutes a REC.
8. **Potential Impacts from Stockpile:** An approximately 400 cubic yard stockpile primarily consisting of soil, but also including metal fencing and broken concrete pieces was observed in southeastern corner of the Site. According to Mr. Koss, the stockpiled soil along with the fencing and concrete was generated from clearing the Site grounds over time. No staining or obvious evidence of a release to the environment was noted in the observable portions of the stockpile during the Site reconnaissance. No information regarding sampling or other assessment of potential contaminants in the soil was available for GHD review at the time of the Site reconnaissance and no stained soil or solid waste was observed in the soil pile. No reasonably ascertainable documentation was found to suggest that the stockpile has any hazardous substances or petroleum products present. The mere presence of a soil pile does not constitute a REC. However, based on the unknown source of the soil, the potential for hazardous substances or petroleum products in the material should be considered when evaluating BER and future land use of the Site.

## Conclusions

GHD has performed a Phase I/II ESA in conformance with the scope and limitations of the Standard of the Site located at 14044 Old 215 Frontage Road in Moreno Valley, California. Any limiting conditions to, or deletions from this practice are described in Section 1 of this report.

## Recognized environmental conditions

The following RECs, as described above, were identified to exist in connection with this Site:

- On-Site Groundwater and Soil Vapor Impacts
- March AFB
- Historical Staining

## Business Environment Risk

The following BERs, as described above, were identified to exist in connection with this Site:

- Potential Agricultural Chemical Impacts from Historical Applications
- Historical On-Site Structures
- Historical Crude Oil Pipeline
- Historical Site Operations
- Potential Impacts from Stockpile

This summary does not contain all of the information that is found in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided, and to aid in any decisions made, or actions taken, based on this information.

# Contents

|           |   |           |
|-----------|---|-----------|
| <b>1.</b> | <b>Introduction</b>   | <b>1</b>  |
| 1.1       | Site Personnel  | 2         |
| 1.2       | Limiting Conditions   | 2         |
| 1.3       | Significance and Use  | 2         |
| <b>2.</b> | <b>Site Description and Location</b>  | <b>3</b>  |
| 2.1       | Site Description  | 3         |
| 2.2       | Environmental Setting   | 4         |
| <b>3.</b> | <b>Environmental Databases Search and Document Review</b>   | <b>4</b>  |
| 3.1       | Environmental Databases Search  | 4         |
| 3.1.1     | Database Listing for the Site   | 6         |
| 3.1.2     | Database Listings for Adjoining Properties  | 6         |
| 3.1.3     | Area Properties   | 7         |
| 3.1.4     | Unmapped Properties   | 7         |
| 3.2       | Historical Records Review   | 7         |
| 3.2.1     | Sanborn Fire Insurance Maps   | 7         |
| 3.2.2     | Property Title Search   | 8         |
| 3.2.3     | Historical Aerial Photographs   | 8         |
| 3.2.4     | City Directories  | 9         |
| 3.2.5     | Historical Topographic Maps   | 10        |
| 3.3       | Government Records Review   | 11        |
| 3.4       | Recorded Environmental Clean-up Liens   | 11        |
| 3.5       | User Information  | 11        |
| 3.6       | Adjoining Properties  | 11        |
| 3.7       | Previous Site Investigations/ESAs   | 13        |
|           | Phase I Environmental Site Assessment, Roux, September 7, 2018  | 13        |
|           | Limited Phase II Site Investigation Report, Roux, November 29 - Draft   | 14        |
|           | Phase II Groundwater Investigation Report, Intertek, January 3, 2019  | 15        |
|           | Limited Environmental Site Investigation Report, Intertek, March 15, 2019   | 15        |
|           | Work Plan Addendum for Phase II Environmental Site Assessment, Terraphase, July 14, 2020<br>(Revised August 18, 2020) | 16        |
|           | Seepage Pit Assessment Report, Alessandro Properties, Terraphase, May 24, 2021  | 16        |
| <b>4.</b> | <b>Site Reconnaissance</b>  | <b>17</b> |
| 4.1       | Utility Services  | 17        |
| 4.2       | Underground Storage Tanks (USTs)  | 17        |
| 4.3       | Aboveground Storage Tanks (ASTs)  | 18        |
| 4.4       | Raw material and Chemical Use and Storage   | 18        |
| 4.5       | Non-hazardous Waste   | 18        |
| 4.6       | Hazardous Waste   | 18        |
| 4.7       | Wastewater/Sewers   | 18        |
| 4.8       | Stormwater  | 18        |
| 4.9       | Air Emissions   | 18        |

# Contents (cont'd)

|           |   |           |
|-----------|---|-----------|
| 4.10      | Polychlorinated Biphenyls (PCBs)                  | 19        |
| 4.11      | Spills/Releases                                   | 19        |
| 4.12      | CERCLA Liability Potential                        | 19        |
| <b>5.</b> | <b>Limited Phase II ESI/Subsurface Assessment</b> | <b>19</b> |
| 5.1       | Drilling and Sampling                             | 20        |
| 5.2       | Stratigraphy                                      | 21        |
| 5.3       | Laboratory Analysis                               | 21        |
| 5.4       | Limited Phase II ESI Results                      | 21        |
| 5.5       | Findings and Opinion                              | 22        |
| 5.6       | Conclusions                                       | 24        |
|           | 5.6.1 Recognized Environmental Conditions         | 24        |
|           | 5.6.2 Business Environment Risk                   | 24        |
| 5.7       | Data Gaps/Data Failure                            | 25        |
| <b>6.</b> | <b>Environmental Professional Statement</b>       | <b>25</b> |
| <b>7.</b> | <b>References</b>                                 | <b>25</b> |

## Figure index

|          |   |
|----------|---|
| Figure 1 | Site Location Map   |
| Figure 2 | Site Plan   |
| Figure 3 | Soil Boring, Grab Groundwater Sample and Vapor Probe Location Map |
| Figure 4 | Previous Investigation Sample Locations                           |
| Figure 5 | Groundwater Analytical Results                                    |
| Figure 6 | Soil Vapor Analytical Results                                     |

## Table index

|         |  |
|---------|--|
| Table 1 | Soil Analytical Results Summary        |
| Table 2 | Groundwater Analytical Results Summary |
| Table 3 | Soil Vapor Analytical Results Summary  |

## Appendices

|            |                                       |
|------------|---------------------------------------|
| Appendix A | Site Photographs                      |
| Appendix B | Assessor Qualifications               |
| Appendix C | Environmental Database Search Results |
| Appendix D | Certified Sanborn Map Report          |
| Appendix E | Historical Aerial Photographs         |
| Appendix F | City Directory Search Results         |
| Appendix G | Historical Topographic Maps           |
| Appendix H | Environmental Lien Report             |
| Appendix I | User Questionnaire                    |
| Appendix J | Previous Investigation/Documentation  |
| Appendix K | Boring Logs                           |
| Appendix L | Laboratory Reports                    |



# 1. Introduction

GHD was retained by Penske Truck Leasing (Penske) to complete a Phase I Environmental Site Assessment (Phase I ESA) and Limited Phase II Environmental Site Investigation (ESI) of the CD Moreno Holding, LLC property located at 14044 Old 215 Frontage Road in Moreno Valley, California (the Site). The purpose of the Phase I ESA portion of this assessment was to identify recognized environmental conditions (RECs), as defined in ASTM International (ASTM) Standard E1527-13 (the Standard), at the Site. This Phase I ESA was conducted to assist Penske in conducting all appropriate inquiries into previous ownership and use of the Site to qualify for specific landowner liability protections under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and to evaluate business environmental risk (BER), as defined in the Standard, for the Site. This Phase I ESA Site reconnaissance was conducted by GHD on May 26, 2021. A Site location map is provided on Figure 1. A Site plan is provided on Figure 2. Photographs taken during the Site reconnaissance are presented in Appendix A.

This Phase I ESA was conducted in general accordance with the Standard for conducting environmental assessments. The assessment included an environmental database search, historical records review, a Site reconnaissance of accessible areas, a review of relevant Site records made available to GHD, and interviews with Site Personnel. This Phase I ESA was prepared by Karen Gale and Jennifer Quigley of GHD, both of whom are environmental professionals, as defined in the Standard. Copies of curricula vitae outlining their qualifications are contained in Appendix B.

The following terms used in this report are defined in the Standard as follows:

- REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment (*de minimis* conditions are not RECs).
- Controlled REC (CREC) is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (i.e., property use restrictions, activity and use limitations, institutional controls, or engineering controls).
- Historical REC (HREC) is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (i.e., property use restrictions, activity and use limitations, institutional controls or engineering controls). HRECs are not RECs.
- *De minimis* condition is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* conditions are not RECs or CRECs.

The following tasks were conducted during the Phase I assessment:

- Interviews with personnel associated with the Site
- Review of Federal and State environmental databases and historical records (i.e., fire insurance maps, city directories)
- Review of historical aerial photographs of the Site
- Review of past and current property use and adjoining property occupancy
- Reconnaissance of the facilities, equipment, utility services, operations, and associated Site records
- Observations of conditions that represent releases or threatened (i.e., likely) releases of hazardous substances or petroleum products to the ground, surface waters or groundwater of the Site

- Review of the results of any prior reconnaissance conducted at the Site
- Review of aboveground and underground storage tank records
- Review of previous environmental reports prepared for the Site

GHD relied on information received from third parties and during the Phase I ESA interviews to the extent that the information was reasonably ascertainable, and also assumed the information received to be accurate unless contradicted by written documentation or field observations.

The following report summarizes the information gathered by GHD during the Phase I ESA and Limited Phase II ESI and identifies RECs, HRECs, CRECs, and *de minimis* conditions as defined in the Standard at the Site.

Evaluation of BER may involve opining on findings of environmental concern that do not constitute a release of a hazardous substance and/or petroleum product (i.e., non-scope considerations). Such opinions will be found within the body of this report.

BER means a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated by the Standard.

## 1.1 Site Personnel

| Site Personnel | Position        | Years Familiar with the Site |
|----------------|-----------------|------------------------------|
| Mr. Tom Koss   | Site Owner      | 1.5                          |
| Mr. Brayden Li | On-Site Manager | 0.5                          |

Mr. Tom Koss, as the Site owner, was identified as the Key Site Manager to be interviewed. Mr. Koss and Mr. Li provided information regarding Site operations and historical Site use.

GHD was accompanied during the Site reconnaissance by Mr. Koss and Mr. Li.

## 1.2 Limiting Conditions

The following limiting conditions to the Standard were experienced in completion of this Phase I ESA:

- Mr. Koss had no firsthand knowledge regarding the history of former operations/uses conducted at the Site prior to his tenure.
- Responses to Freedom of Information Act (FOIA) requests for information from the local/county/state environmental offices has not been received as of the date of the report.

## 1.3 Significance and Use

This Phase I ESA and Limited Phase II ESI was conducted in a manner consistent with that level of care and skill exercised by members of the environmental engineering and science profession currently practicing under similar conditions and was based upon the information made available to GHD representatives at the time of this assessment. It remains important to recognize that no Phase I ESA and Limited Phase II ESI can wholly eliminate uncertainty regarding the potential for RECs in connection with the Site. The performance of the assessment is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a Site. The User, as defined in the Standard, must recognize reasonable limits of time and cost. For the purpose of this Phase I ESA, the User has been identified as Penske Truck Leasing.

This Phase I ESA and Limited Phase II ESI has been prepared for the use of Penske and may not be relied upon by any other party without GHD's written consent. In accordance with Section 4.6 of the Standard, this Phase I ESA is viable until October 26, 2021, which is 180 days from the oldest primary component of the Phase I ESA.

## 2. Site Description and Location

### 2.1 Site Description

The Site is located southeast of the intersection of Alessandro Boulevard and Old 215 Frontage Road and includes the addresses of 14044 Old 215 Frontage Road and 21839 and 21921 Alessandro Boulevard in the City of Moreno Valley, California. The Site is developed with a small wooden shed on the northeastern border located on approximately 9.6 acres of land. The Site is located on the western portion of an undeveloped, irregularly shaped lot totaling approximately 19.36 acres of land (Property). The remainder of the Site is unpaved with sparse areas of vegetation. A portion of the Site is used for tractor trailer storage. A soil and debris stockpile is located on the southeastern corner of the Site.

Based on the review of historical aerial photographs, the northwestern portion of the Site was previously occupied by several commercial/industrial buildings from at least 1949 until at least 1989. Based on the review of city directories, the Site was occupied by: Sundial Camper in 1976 and 1980; Tractorland between 1992 and 2017; Mark Gorin & Associate (auctioneers) and Parts West in 1995 and 1995; P&D Equipment RPR and South CST Portable in 1992; Tec Storage in 1995; Yucaipa Towing in 2014; and C5 Equipment Rentals in 2017. Specific information regarding the operations conducted by these entities was not reasonably ascertainable. No information was available regarding demolition of the structures, potential underground storage tanks (USTs), potential aboveground storage tanks (ASTs), wastewater disposal, water supply, chemical use/storage, solid waste generation, or potential hazardous waste generation. Based on a review of aerial photographs, no other buildings were historically located on the Site from at least 1938 until current Site development.

The remaining portions of the Site were undeveloped land or were used for parking and/or equipment storage from at least 1949 to at least 1989. Prior to 1949, the Site was cultivated and/or undeveloped vegetated land from at least 1938, with portions of the Site utilized as cultivated land during varying timeframes until sometime between 1978 and 1985. Based on historical city directories, the Site was occupied by a camper sales lot from 1976 to 1980 and large equipment sales/auctioneers/parts retail facilities from 1985 to 2017. Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have historically been used on the Site. Information regarding historical use, storage or application rates is not reasonably ascertainable.

The Site is currently used for tractor trailer storage.

According to Parcel Quest, the Site consists of eight parcels which are identified in the table below.

| Parcel      | Acreage |
|-------------|---------|
| 297-120-017 | 0.320   |
| 297-120-018 | 0.320   |
| 297-120-025 | 3.940   |
| 297-120-002 | 0.160   |
| 297-120-003 | 0.130   |
| 297-100-076 | 0.970   |
| 297-100-073 | 0.640   |
| 297-100-091 | 3.150   |

An underground pipeline runs west to east across the central portion of the Site. According to information reported by others, the pipeline was active from the 1960s to 1999 and was formerly operated by ARCO Four Corners to transport crude oil. The pipeline was deactivated in 2001, cleaned and neutralized with nitrogen.

No pits, ponds, lagoons, or areas of stressed vegetation were observed on Site during the Site reconnaissance.

## 2.2 Environmental Setting

The Site is located in a predominantly commercial and light industrial area in the southwestern portion of Moreno Valley, Riverside County, California. General topographic gradient at the Site and surrounding area is to the west based on the United States Geological Survey (USGS) topographic map in the Environmental Data Resources (EDR) Radius Map report.

No surface water bodies are located on the Site. The closest bodies of water are situated approximately 2.5 miles to the northwest in Sycamore Canyon Park. The Site is not listed as being in the 100-year or 500-year flood zone. EDR conducted a records search of the United States (U.S.) Fish and Wildlife Service 2002, 2005, and 2010 National Wetlands Inventories (NWI) for the Site and surrounding area. No wetlands were identified by EDR on or adjoining the Site in the NWI.

According to the information provided in the GeoCheck section of the EDR Radius Map Report, soils underlying the site consist of the Monserate series. Soil surface texture consist of sandy loam, which is well drained soils with low infiltration rates. Soils encountered during the Limited Phase II ESI included sand and silty sand to 25 feet below ground surface (bgs). During the Phase II ESI, groundwater was encountered at approximately 12 feet bgs on the northern portion of the Site. Groundwater was not encountered on the southern portion of the Site during drilling which encountered refusal at a depth of 16 feet bgs. Groundwater on the northern portion of the Site was measured during previous investigations to flow northerly/northwesterly.

Based on the USGS 7.5-Minute Riverside East, California Topographic Map, the Site is located at approximately 1,543 feet above mean sea level (AMSL).

## 3. Environmental Databases Search and Document Review

### 3.1 Environmental Databases Search

GHD contracted EDR to conduct a search of federal and state environmental databases. Based on the address of the Site and the Site boundaries, the database searches were completed to assist in the identification of RECs in connection with the Site and to assess the likelihood of an impact to the Site from migrating hazardous substances or petroleum products. The following Standard Environmental Records were searched within the approximate minimum search distance (AMSD) specified in the Standard and Additional Environmental Records were searched as listed below:

| Database  | Search Radius |
|---|---------------|
| <b>Standard Environmental Records</b>                         |               |
| National Priority List (NPL)                                  | 1.0 mile      |
| Proposed NPL  | 1.0 mile      |
| Federal Superfund Liens (NPL Liens)                           | Site only     |
| National Priority List Deletions (Delisted NPL)               | 1.0 mile      |
| Federal Facility Site Information Listing (FEDERAL FACILITY)  | 0.5 mile      |
| Superfund Enterprise Management System (SEMS)                 | 0.5 mile      |
| Superfund Enterprise Management System Archive (SEMS-ARCHIVE) | 0.5 mile      |
| Corrective Action Report (CORRACTS)                           | 1.0 mile      |

| Database  | Search Radius           |
|---|-------------------------|
| Resource Conservation and Recovery Act Information (RCRA) Treatment, Storage or Disposal Facility (RCRA-TSDF) | 0.5 mile                |
| RCRA-Large Quantity Generator (RCRA-LQG)  | Site/Adjoining Property |
| RCRA-Small Quantity Generator (RCRA-SQG)  | Site/Adjoining Property |
| RCRA-Conditionally Exempt Small Quantity Generators (RCRA-CESQG)  | Site/Adjoining Property |
| RCRA-Very Small Quantity Generator (RCRA-VSQG)  | Site/Adjoining Property |
| Land Use Control Information System (LUCIS)   | 0.5 mile                |
| Engineering Controls Sites List (US ENG CONTROLS)   | 0.5 mile                |
| Institutional Controls (US INST CONTROLS)   | 0.5 mile                |
| Emergency Response Notification System (ERNS)   | Site only               |
| State Response Sites (RESPONSE)   | 1.0 mile                |
| EnviroStor Database (EnviroStor)  | 1.0 mile                |
| Solid Waste Information System (referred to as SWF/LF)  | 0.5 mile                |
| Leaking Underground Storage Tank (LUST)   | 0.5 mile                |
| Leaking USTs on Indian Land (Indian LUST)   | 0.5 mile                |
| Cleanup Program Sites (CPS)-Spills, Leaks, Investigations, and Cleanups (SLIC)                                | 0.5 mile                |
| Military UST Sites  | Site/Adjoining Property |
| Proposed Closure of USTs (UST Closure)  | Site/Adjoining Property |
| Federal Emergency Management Agency (FEMA UST)  | Site/Adjoining Property |
| Active Underground Storage Tank (UST)   | Site/Adjoining Property |
| Aboveground Storage Tank (AST)  | Site/Adjoining Property |
| USTs on Indian Land (Indian UST)  | Site/Adjoining Property |
| Voluntary Cleanup Priority Listing (Indian VCP)   | 0.5 mile                |
| Voluntary Cleanup Program Properties (VCP)  | 0.5 mile                |
| Brownfields Sites Listing (Brownfields)   | 0.5 mile                |
| <b>Additional Environmental Records</b>   |                         |
| SPILLS  | Site only               |
| Statewide Environmental Evaluation and Planning System (SWEEPS UST)   | Site/Adjoining Property |
| Hazardous Substance Storage Container Database (HIST UST)   | Site/Adjoining Property |
| Facility Inventory Database (FID UST)   | Site/Adjoining Property |
| California Environmental Reporting System (CERS) TANKS  | Site/Adjoining Property |
| CERS Hazardous Waste (CERS HAZ WASTE)   | Site/Adjoining Property |
| Cleaner Facilities (Drycleaners)  | 0.25 mile               |
| State Coalition for Remediation of Drycleaners Listing (SCRD Drycleaners)                                     | 0.25 mile               |
| PFAS Contamination Site Location Listing (PFAS)   | 0.5 mile                |
| EDR Exclusive Historical Cleaners (EDR Hist Cleaner)  | 0.125 mile              |
| EDR Exclusive Historical Gas Stations (EDR Hist Auto)   | Site/Adjoining Property |
| Recovered Government Archive LUST (RGA LUST)  | 0.5 mile                |

A copy of the database search, which includes definitions for the above-referenced databases, is included as Appendix C. It should be recognized that the availability, accuracy and completeness of the record information may vary among information sources, including governmental sources. GHD reviewed information for properties identified within the referenced AMSD. GHD considers a variety of factors in determining which off-Site properties, if any, have the potential to impact the Site. These factors include, but are not limited to, the following:

- Type of database on which a property was identified
- Information presented in the EDR Radius Map report and reasonably ascertainable government databases
- Direction and distance of the property from the Site
- Suspected or known groundwater flow direction at or near the Site
- Likelihood that released contaminants, if any, could migrate to the Site
- Surface and subsurface features (i.e., soil types, utility corridors)

### 3.1.1 Database Listing for the Site

The Site address is listed in the following aforementioned databases searched with the status as listed:

| Property Address   | Listed Entity         | Listing/Status    |
|--|-----------------------|-------------------|
| 21921 Alessandro Boulevard                                       | Industrial Parts Inc. | RCRA-SQG          |
| 14044 Old Frontage Road and 21839 and 21921 Alessandro Boulevard | Alessandro Properties | ENVIROSTOR<br>VCP |

In addition to the above, the Site address of 21921 Alessandro Boulevard is listed in the Facility and Manifest Data (HAZNET), Hazardous Waste Tracking System (HWTS), Facility Index System (FINDS), and Enforcement and Compliance History Online (ECHO) databases, the definitions of which are provided in Appendix C.

The Site is mapped within the March Air Force Base site. March Air Force Base is also listed in the NPL, SEMS, US ENG CONTROLS, US INST CONTROLS, Record of Decision (ROD), Potentially Responsible Parties (PRP), and RCRA-LQG databases; however, the mapped boundaries presented in the EDR database search report do not include the Site. Refer to Section 3.6 for further details,

Refer to Sections 3.7, 4.6 and 4.12 for further details.

### 3.1.2 Database Listings for Adjoining Properties

The following adjoining properties are listed in the aforementioned databases searched with the status as listed:

| Property Address           | Listed Entity       | Listing/Status   |
|----------------------------|---------------------|--|
| 21891 Alessandro Boulevard | Baldwins Automotive | RCRA-SQG (No violations)   |
|                            | My Tran E Shop LLC  | SWEEPS UST (1 UST/Status Not Reported)<br>CA FID UST<br>CERS HAZ WASTE |
| 21820 Alessandro Boulevard | Lessas Auto Parts   | EDR Hist Auto  |
| 21840 Alessandro Boulevard | Charlebois Liquors  | LUST (Case Closed)<br>HIST UST (2 USTs/Status Not Reported)            |

In addition to the above, the eastern boundary of March Air Force Base addressed as 22 CSG/CC is located on the western adjoining property, as indicated above.

Refer to Section 3.6 for further details.

### 3.1.3 Area Properties

The following additional Area Properties (i.e., properties located within the effective AMSD of the Site) are listed in the aforementioned databases searched with the status as listed:

| Property Address                                       | Listed Entity             | Listing/Status   |
|--|---------------------------|--|
| 22144 Alessandro Boulevard<br>(1/8 – 1/4 mile ENE)     | Flite Chief, Inc. (Mobil) | LUST (Case Closed)                                       |
| None La Media & Lone Star<br>(1/8 – 1/4 mile S)        | Gas 4 Less                | LUST (Leak Being Confirmed)                              |
| 2624 Alessandro Boulevard<br>(1/4 – 1/2 mile WNW)      | ARCO #6345                | LUST (Leak Being Confirmed)<br>LUST (Open – Remediation) |
| 3,545 Acres; E. of Riverside<br>(1/2 – 1 mile SSW)     | March USAR                | EnviroStor   |
| 14420 Elsworth Street, Suite 114<br>(1/2 – 1 mile ESE) | Alper Cleaners            | EnviroStor   |

Based on the factors listed in Section 3.1, no evidence of the likelihood for a hazardous substance or petroleum product release impacting the Site through migration from the above-mentioned Area Properties was identified based on information provided in the EDR Radius Map report.

### 3.1.4 Unmapped Properties

In addition to the above, the database search identified four properties that could not be mapped based on the address information within the database system, also referred to as "orphan" sites in the database search results. Refer to Appendix C for further details.

GHD confirmed that the listed unmapped properties are not located adjoining or in close proximity to the Site based on the available information and observations made during the Site reconnaissance.

## 3.2 Historical Records Review

GHD reviewed the following information, where reasonably ascertainable, to identify the historical usage of the Site and adjoining properties:

- Sanborn Fire Insurance Maps
- Property Title Search
- Historical Aerial Photographs
- City Directories
- Historical Topographic Maps

### 3.2.1 Sanborn Fire Insurance Maps

Sanborn Fire Insurance maps assist in the identification of historical land use and commonly illustrate the existence and location of above ground and underground storage tanks (ASTs and USTs), structures, improvements, and Site operations.

No Sanborn maps were reported to be available for the Site in the EDR Sanborn Library, LLC collection.

A copy of the Certified Sanborn Map report is presented in Appendix D.

## 3.2.2 Property Title Search

Property title information for the Site was not available from Penske.

## 3.2.3 Historical Aerial Photographs

Aerial photographs assist in the identification of Site features and outdoor activities of potential environmental concern. Aerial photographs of the Site for the years 1938, 1949, 1953, 1959, 1967, 1978, 1985, 1989, 2006, 2009, 2012, and 2016 were available from EDR and were reviewed by GHD. The specific details observed at the Site and adjoining properties are dependent on the scale and quality of the aerial photographs reviewed. The aerial photographs were reviewed at a scale of one-inch equals approximately 500 feet. The following is a summary of observations based on a review of the aerial photographs:

- 1938: The 1938 aerial photograph depicts the Site and the adjoining properties as cultivated land. Alessandro Boulevard is depicted to the north of the Site, with apparent residences depicted beyond. A railroad is depicted to the west of the Site.
- 1949: The 1949 aerial photograph depicts improvements to the Site in the northwestern corner with two commercial-type structures. The rest of the Site is either vacant and undeveloped or what appears to be a lot for vehicle storage. The adjoining property to the south appears to be an extension of the vehicle storage lot on the Site with an unimproved road leading to a property to the west. The adjoining property to southwest is improved with commercial/industrial/military buildings. The adjoining property to the north consists of commercial or residential buildings beyond Alessandro Boulevard. No significant changes have occurred on the adjoining property to the east.
- 1953: The 1953 aerial photograph depicts the Site and adjoining properties as substantially 1949 aerial photograph, with the exception that the vehicle storage lot of the adjoining property to the south is now abandoned and vacant.
- 1959, 1967: The 1959 and 1967 aerial photographs depict the Site buildings as essentially unchanged from the 1953 aerial photograph, with the exception that the former storage area is no longer visible. The adjoining property to the east is improved with two small buildings on the north and one building on the east. The properties to the north of the Site beyond Alessandro Boulevard depict additional residential or commercial buildings. The adjoining property to the west depicts two roads. The adjoining property to the south is undeveloped vacant land.
- 1978: The 1978 aerial photograph depicts commercial/industrial buildings located on the northwestern portion of the Site. The southern portion of the Site is cultivated land. Highway 215 Frontage Road adjoins the Site to the west. The adjoining properties to the north and east are occupied by industrial or commercial buildings. The adjoining property to the south is cultivated land. The western adjoining property beyond Highway 215 Frontage Road remains essentially unchanged from the 1967 aerial photograph.
- 1985, 1989: The 1985 and 1989 aerial photographs depict the Site and the adjoining properties to the west and south as consistent with the 1978 aerial photograph, with the exception that the areas previously depicted as cultivated appear fallow. The adjoining property to the east is developed with commercial buildings to the northeast and is used for equipment storage to the southeast. Adjoining properties to the north beyond Alessandro Boulevard are depicted as either commercial or industrial buildings. The industrial/military structure to the southwest of the Site beyond Highway 215 Frontage Road has been removed.
- 2006, 2009: The 2006 and 2009 aerial photographs depict the buildings in the northern portion of the Site were removed. Equipment is shown to be stored on the eastern and central portions of the Site. There has been no obvious change to the property adjoining the Site to the west. The adjoining properties to the north and east are depicted as industrial or commercial building space. The adjoining property to the south appears to be fallow with a few dirt roads.
- 2012: The 2012 aerial photograph depicts no obvious changes to the Site and adjoining properties to the west and north since 2006. A small body of water is depicted in the central western portion of the Site. In addition to the commercial buildings on the northern portion of the easterly adjoining property, the southern portion of the property is used for equipment storage. The adjoining property to the south appears to be cleared for construction.



2016: The 2016 aerial photograph depicts the Site as used for tractor trailer and equipment storage. There are no obvious changes to the adjoining properties to the west, east, and north. The adjoining property to the south has been developed with several structures.

Copies of reviewed aerial photographs are presented in Appendix E.

### 3.2.4 City Directories

A city directory search was conducted by EDR from the first available directory to the present. Directories were available and were reviewed by EDR at approximately 5-year intervals beginning in 1976 and ending in 2017. The following were identified as occupants of the Site.

The Site is listed in the following city directories reviewed:

| Address               | Year       | Entities   |
|-----------------------|------------|--|
| 21921 Alessandro Blvd | 1976, 1980 | Sundial Camper   |
|                       | 1985       | Quick on Steel Co<br>Tractorland Inc   |
|                       | 1992       | Gorin Mark & Assocts<br>P&B Equipment RPR<br>Parts West<br>South CST Portable<br>Tractorland Inc           |
|                       | 1995       | Mark Gorin & Assoc Auctioneers<br>Parts West<br>Tec Storage<br>Tractorland Equipment Co<br>Tractorland Inc |
|                       | 2000       | Tractorland Incorporated   |
|                       | 2005       | Tractorland Equipment  |
|                       | 2010       | Tractorland Inc  |
|                       | 2014       | Tractorland Inc<br>Yucaipa Towing  |
|                       | 2017       | C5 Equipment Rentals<br>Tractorland Inc  |

The following entities, other than residential properties, are identified in proximity to the Site:

| Address               | Year(s)           | Entity   |
|-----------------------|-------------------|--|
| 21942 Alessandro Blvd | 1980-2017         | Alessandro Mini Storage                        |
| 21891 Alessandro Blvd | 2017<br>2005-2014 | My Tran-E Shop<br>Baldwins Towing & Automotive |
| 21866 Alessandro Blvd | 1980 - 1995       | Kendalls Auto Serv                             |
| 21840 Alessandro Blvd | 1976-2017         | Charlebois Liquors                             |
| 21830 Alessandro Blvd | 1980              | Edgemont Cleaners                              |

| Address               | Year(s)   | Entity                                  |
|-----------------------|-----------|---|
| 21801 Alessandro Blvd | 1980      | Collectors Corral                       |
|                       | 1985      | Cameron's CRPT&SPLY                     |
|                       | 1992      | Susan Rapa INTRS                        |
|                       | 2000      | Arts Home Furnishing Vases Lamps & Etc. |
|                       | 2005      | Chaplains Real BBQ & catering           |
|                       | 2014-2017 | Family Service Association              |

A copy of the city directory search is presented in Appendix F.

### 3.2.5 Historical Topographic Maps

Historical topographic maps were reviewed to assist in the identification of historical land use, to document the general development of the Site and properties in the vicinity of the Site, and to identify potential on-Site fill activities. Historical topographic maps of the Site and adjoining properties for the years 1901, 1942, 1947, 1953, 1967, 1980, and 2012 were available from EDR and were reviewed by GHD. The 1901 topographic map was reviewed at a scale of 1:62500, the 1942 topographic map was reviewed as a scale of 1:31680, the 1947 topographic map was reviewed at a scale of 1:50000, and the remaining topographic maps were reviewed at a scale of 1:24000. The following is a summary of observations based on a review of the historical topographic maps:

- 1901: The Site is depicted in the 1901 topographic map as vacant land with no structures. The vicinity of the Site is undeveloped except several roads in the area, along with a San Bernardino and Temecula railroad line to the west of the Site.
- 1942: Coverage of the Site and adjoining properties was not provided on the 1942 topographic map.
- 1947: The 1947 topographic map depicts the Site as vacant land with no structures. Several streets intersect Alessandro Boulevard to the north. Beyond Alessandro Boulevard are several properties that appear to be occupied by commercial or residential buildings. Other adjoining properties to the west and south are depicted as vacant land. Frontage Road and the Topeka and Santa Fe railroad line are located to the west of the Site.
- 1953: The 1953 topographic map depicts several buildings on the northwestern portion of the Site. The southern portion of the Site is vacant land. Several buildings have been added to the northerly adjoining properties in the Edgemont residential neighborhood. Properties to the east, west, and south appear to be unchanged from the 1947 topographic map. Changes to the surrounding area include a pipeline and the March Field Air Force Base to the south of the Site.
- 1967, 1980: The 1967 and 1980 topographic maps depict additional structures on the northwestern portion of the Site. Commercial buildings have been added to the adjoining properties to the east. Properties to the north and south appear to be unchanged from the 1953 topographic map. Changes to the surrounding area include a road extension to the south (Cactus Avenue) and the Escondido Freeway to the west and further expansion of Edgemont neighborhood to the north.
- 2012: Due to the level of detail provided in the 2012 topographic map, no features are depicted on the Site or on the adjoining properties other than roadways and surface water bodies. The configuration of the Escondido Freeway has changed with the roadway and interchange further west of the Site. The former freeway is now the adjoining Frontage Road.

It should be noted that topographic maps do not always accurately depict structures and development as of the date of the map.

Copies of reviewed historical topographic maps are presented in Appendix G.

### 3.3 Government Records Review

GHD submitted FOIA requests for the Site addresses to:

- The County of Riverside Fire Department
- The County of Riverside Department of Health
- The County of Riverside Planning Department

In addition, GHD reviewed records for the Site at and GHD accessed the following regulatory website for environmental-related information related to the Site addresses, respectively:

- The Department of Toxic Substances Control (DTSC)
- The National Pipeline Mapping System (NPMS) Public Viewer
- State Water Resources Control Board Geotracker Database

The relevant information reviewed at the DTSC through the Envirostor database is included in Section 3.7.

No agency responses have been received as of the date of this Phase I ESA. The documentation will be reviewed once received. Once reviewed, if it is determined that the documentation affects or attributes to RECs identified in this Phase I ESA, the documentation will be summarized and provided in a separate letter and provided to Penske. It should be noted that if the FOIA documentation is not received within 20 days of the date of this Phase I ESA, the requested information is considered not reasonably ascertainable.

### 3.4 Recorded Environmental Clean-up Liens

GHD contracted EDR to conduct a search of environmental liens and activity and use limitations (AULs) associated with the ownership or occupation of the Site (Parcel Identification Numbers: 297-100-066, 297-120-016, 297-100-073, 297-100-076, 297-120-017, and 297-120-018).

Based on documentation provided by EDR, CD Moreno Holding LLC repurchased the Site after a lot line adjustment on July 28, 2020 (date recorded).

The environmental lien and AUL search conducted by EDR indicated that no environmental liens or AULs were recorded for the Site (as of April 29, 2021).

The Site address is not listed in the EDR Radius Map report as having any environmental liens or AULs. Mr. Koss is unaware of any environmental liens or AULs associated with the Site address.

A copy of the EDR Environmental Lien and AUL Search Report is provided in Appendix H.

### 3.5 User Information

A User Questionnaire was submitted to Mr. Chris Miller of Penske for completion to address certain User responsibilities in accordance with the Standard. Mr. Miller completed the User Questionnaire, a copy of which is provided in Appendix I. The answers to the User Questionnaire were considered when determining the findings of this report.

### 3.6 Adjoining Properties

The Site is bordered by the following properties:

**North:** By Family Service Association, My Tran-E Shop, Baldwins Automotive and beyond Alessandro Boulevard by Charlebois Liquors, Lessas Auto Parts and Advance Car Stereo

**East:** By C5 Equipment Rentals and beyond by Alessandro Self Storage

**South:** By Robertson's Ready Mix and beyond by vacant land

**West:** By Old 215 Frontage Road and beyond by a warehouse distribution facility.

No activities were observed on the adjoining properties during the Site reconnaissance, as viewed from the Site and publicly accessible areas, that appeared to pose a risk of migration of hazardous substances or petroleum products to the Site. No evidence of gas or oil wells, water supply wells, or bulk chemical/petroleum storage was observed on properties adjoining the Site. Groundwater monitoring wells and soil vapor probes associated with previous investigations conducted by others are located on the north and easterly adjoining properties.

No gas or oil well, water supply wells, or underground pipelines (other than then the former crude oil pipeline that crosses the Site) are depicted on the adjoining properties in the EDR Radius Map report or on the NPMS website.

Based on available information, the following adjoining properties are listed in the EDR Radius Map report regarding the use or storage of hazardous substances or petroleum products:

- **21891 Alessandro Boulevard:** The property located at 21891 Alessandro Boulevard is occupied by Baldwins Automotive, which is listed as a RCRA-SQG facility. No violations were noted. The property is also occupied by My Tran E Shop LLC, which is listed on the SWEEPS UST, CA FID UST and CERS HAZ Waste databases. The SWEEPS UST database indicates the tank use and contents are unknown. The CA FID UST indicates the facility generates unspecified oil-containing waste. The facility is listed on the CERS HAZ UST database for several violations recorded between 2015 and 2019. The facility is currently in compliance and has no release listing. This property is located to the north of the Site and is considered to be topographically downgradient of the Site in the anticipated direction of groundwater flow. Based on the information reviewed, this property is not expected to impact the Site.
- **21820 Alessandro Boulevard:** Lessas Auto Parts, at 21820 Alessandro Boulevard is listed in the EDR Hist Auto. The facility has been an auto parts store since at least 1991. No additional information was provided in the EDR report. This property is not listed in any databases searched as having a release to the environment. This property is located to the north of the Site and is considered to be topographically downgradient of the Site in the anticipated direction of groundwater flow. Based on the information reviewed, this property is not expected to impact the Site.
- **21840 Alessandro Boulevard:** Charlebois Liquors, at 21840 Alessandro Boulevard is identified as a LUST (Case Closed) and HIST UST (2 USTs/Status Not Reported). The LUST listing is a result of a release gasoline from a fuel dispenser in 1986, which was closed in 2012. This property is located to the north of the Site and is considered to be topographically downgradient of the Site in the anticipated direction of groundwater flow. Based on the information reviewed, this property is not expected to impact the Site.
- **March Air Force Base site:** This site is listed on NPL, SEMS, US ENG CONTROLS, US INST CONTROLS, Record of Decision (ROD), Potentially Responsible Parties (PRP), and RCRA-LQG databases, the boundaries of which include the Site in the EDR Radius map report. This Superfund property has had petroleum hydrocarbon and VOC impacts to groundwater. According to the U.S. EPA website, *“The 7,123-acre March Air Force Base (AFB) has been used for aircraft maintenance and repair, refueling operations, and training activities since 1918. Facility operations contaminated soil and groundwater with hazardous chemicals. Three zones of groundwater contamination beneath the base were identified and wells on base were shut down in the late 1980s and were later properly destroyed. Groundwater contamination has migrated to wells located off base that are no longer in use. However, a groundwater containment system has been installed to prevent off-site groundwater migration and the off-site plume is being monitored. The site’s long-term cleanup is ongoing.”* The U.S. EPA website also indicated that *“Operation of the Groundwater Extraction and Treatment System (GETS) began in April 1992. In September 1996, the GETS was initially expanded as the Enhanced Groundwater Extraction System (EGETS) to include 14 extraction wells and five injection wells. During December 2019, drilling and well installation for six new extraction wells for the EGETS2 expansion began and it became operational in July 2020.”* Information regarding the locations of the wells or groundwater flow was not included on the U.S. EPA website; however, the 2018 Roux report indicated that regional groundwater flow is to the southeast. Information regarding potential soil gas impacts was not provided on the U.S. EPA website. The website also indicated *“Most of the sites either have been cleaned up or determined that no clean up was needed. One landfill was capped (Site 4) and other landfill material was moved to a properly constructed landfill (Site 6). A groundwater interdiction system at the base*

*boundary (EGETS) is operating. The groundwater plumes are generally shrinking. A Soil Vapor Extraction system is removing contaminants from Site 7. Emerging contaminants, perfluorinated compounds including PFOA/PFOS, are being investigated in soil and groundwater.”* The March AFB is located to the southwest of the Site and regional groundwater flow reportedly to the southeast; however, the extent of the plume associated with the March AFB could not be confirmed at the time of this Phase I ESA. Therefore, potential impacts to the Site could not be determined.

Additionally, several investigations have been conducted on the Property, of which the Site comprises a portion and which is adjoining to the Site. Details regarding investigations conducted on the Property and Site are provided in Section 3.7.

Based on the review of available historical aerial photographs, city directories, and historical topographic maps, no operations or conditions that would typically result in a release of hazardous substances or petroleum products were identified relative to the Site, other than those discussed above.

Based on the above, no FOIA requests were submitted to local, state, or federal regulatory agencies for the adjoining properties.

Based on the available information reviewed during this Phase I ESA, the adjoining property to the northeast of the Site was identified as posing an obvious risk of groundwater and soil vapor migration of hazardous substances or petroleum products to the Site that require further evaluation due to its suspected use as a dry cleaning facility and the concentrations of VOCs in the soil vapor and groundwater.

### **3.7 Previous Site Investigations/ESAs**

Investigations have been conducted on the Property, of which the Site comprises a portion, from 2006 to 2020. Information relative to the Site has been summarized from the following documents, which were prepared between 2018 and 2020.

- Phase I Environmental Site Assessment, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard Moreno Valley, Riverside County, California, prepared by Roux Associates, Inc., September 7, 2018
- Draft Limited Phase II Site Investigation Report, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard Moreno Valley, California, prepared by Roux Associates, Inc. (Roux), November 29, 2018
- Phase II Groundwater Investigation Report - Draft, Gateway Business Park, 14044 Old 215 Frontage Road, and 21839 and 21921 Alessandro Boulevard, Moreno Valley, California, prepared by Intertek PSI (Intertek), January 3, 2019
- Limited Environmental Site Investigation Report, Gateway Business Park, 14044 Old 215 Frontage Road, and 21839 and 21921 Alessandro Boulevard, Moreno Valley, California, prepared by Intertek, March 15, 2019.
- Work Plan Addendum for Phase II Environmental Site Assessment at the Alessandro Properties Site, 14044 Old 215 Frontage Road and 21839 and 21921 Alessandro Boulevard, Moreno Valley, California, prepared by Terraphase Engineering (Terraphase), July 14, 2020 (Revised August 18, 2020).
- Seepage Pit Assessment Report, Alessandro Properties, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard, Moreno Valley, California prepared by Terraphase, May 24, 2021.

#### **Phase I Environmental Site Assessment, Roux, September 7, 2018**

In March 2018, Roux conducted a Phase I ESA of a 19.3-acre property which included the Site. The following RECs, as interpreted by Roux, were identified that were related to the Site:

- An underground pipeline that runs across the central portion of the Site. This pipeline was “formerly operated by ARCO FOUR Corners as a crude oil pipeline from approximately the 1960s to 1999, followed by cleaning via pumping and deactivating nitrogen in 2001. The use of the pipeline for crude oil transfer for decades represents a REC.”

- “Large-scale vehicle/equipment storage and/or maintenance on unpaved surfaces since the late 1940s.” “The potential for releases of petroleum products and other fluids associated with automobile and heavy equipment maintenance and repair operations represents a REC.”
- Historical construction-related operations since at least the 1960s and “possible stockpiles, uneven terrain, and topographic lows with pooling liquids, and the Site reconnaissance identified potentially imported fill material with unknown sources throughout the Site, all of which represent a REC.”
- A former dry-cleaning business was reportedly located on the property (which is located on the adjacent property to the northeast of the Site). The source of this information was during an interview with a site representative from 2003 where they indicated the business operated from the late 1950s or early 1960s. Other details are unknown. “The potential presence and use of chlorinated solvents represents a REC.”

In addition, the Phase I reported the following HREC, as interpreted by Roux:

- “The Site is currently adjacent to the March Air Force Base Superfund site but was reportedly formerly located within the groundwater plume cleanup area”. “This Superfund site has had known petroleum hydrocarbon and chlorinated solvent impacts to groundwater”. “The base is located to the southeast of the Site and regional groundwater flow is to the southeast, but the former potential for subsurface migration and vapor intrusion at the Site represent an HREC.”

### **Limited Phase II Site Investigation Report, Roux, November 29 - Draft**

The Limited Phase II ESA included the completion of 47 soil borings during three investigations: Phase II-A, Phase II-B, and Phase II-C, respectively.

The Phase I report indicated that a dry-cleaning business formerly operated in a building on the adjoining property to the northeast of the Site. The business reportedly operated in the late 1950s or early 1960s. Any other details related to the business are unknown.

The scope of work conducted in each Phase II investigation included the following:

- Phase II-A – Seventeen soil borings (RB-01 through RB-17) were completed on the Property and Site to collect soil and soil gas samples. The results indicated that tetrachloroethene (PCE) was detected in all but one of the collected soil gas samples with the highest concentration being 14,000 micrograms/cubic meter ( $\mu\text{g}/\text{m}^3$ ) sampled from RB-07 located in the northwestern portion of the Property. Roux suspected that a dry cleaner was formerly present in the area, which was the source of the identified impacts. Six of these borings were located on the Site (RB-01 through RB-6). The highest soil vapor PCE concentration in these Site borings was at a concentration of 208  $\mu\text{g}/\text{m}^3$  in RB-06, which is located by the drain on the eastern side of the Site. Two of the soil vapor samples (RB-01 and RB-06) exceeded the HHRA Note 3 Screening Level for PCE (67  $\mu\text{g}/\text{m}^3$ ). RB-01 is located in the northwestern portion of the Site.
- Phase II-B - Fifteen soil borings were completed in proximity to RB-07, which is on the adjoining property to the northeast of the Site, for the collection of soil and soil gas samples. Soil gas samples were collected at depths of 4.5-ft bgs and 19.5 ft bgs. The results indicated that the shallow soil gas samples had detectable PCE concentrations with the highest concentration being 107,000  $\mu\text{g}/\text{m}^3$  in RB-07-N3. Out of the 15 soil samples that were collected, only one detected PCE at a depth of 19.5 ft bgs with a concentration of 2 micrograms per kilogram ( $\mu\text{g}/\text{kg}$ ). None of these borings were located on the Site.
- Phase II-C - Fifteen soil borings were completed on the northern portion of the Property (the adjoining property northeast of the Site) for the collection of soil and soil gas samples. The placement of these borings was at increased distances from the assumed PCE source area. The results indicated that detected concentrations in soil samples were below the current regulatory screening criteria. Soil gas samples were collected at depths of 4.5 ft bgs to 19.5 ft bgs and all were above the current regulatory screen criteria with the highest PCE concentration of 613,000  $\mu\text{g}/\text{m}^3$  identified in RB-C-06 at 5 ft bgs. None of these borings were located on the Site.

## Phase II Groundwater Investigation Report, Intertek, January 3, 2019

In December 2018, Intertek conducted a Limited ESI, which included the completion of six temporary groundwater monitoring wells (B1 through B6) and the collection of grab groundwater samples at depths of 28 to 30 ft bgs. Two of the wells were located on the Site (B1 and B2). PCE was detected in four of the six grab groundwater samples (B2, B3, B5, and B6) at concentrations above current regulatory screening criteria. The highest concentration of PCE was 17 micrograms per liter ( $\mu\text{g/L}$ ) in B-5, the well located north of the assumed source area. A concentration of 13  $\mu\text{g/L}$  of cis-1,2-dichloroethene (cis-1,2-DCE), which is above the current regulatory screening criteria of 6  $\mu\text{g/L}$ , was also detected.

Based on the results, Intertek recommended additional sampling to further define the extent of the PCE impacts in soil and groundwater in the northern portion of the Property and in soil and groundwater below the northern adjoining Alessandro Boulevard.

## Limited Environmental Site Investigation Report, Intertek, March 15, 2019

The Limited ESI report included a summary of a 2006 Phase I ESA prepared by Stantec. A copy of the Stantec report was not included in the Limited ESI report.

According to Intertek, Stantec identified the following RECs:

- The 1953 aerial photograph indicated that the southern portion of the Property was used by March Air Force Base (AFB) for unknown purposes. March AFB is located 0.12-miles southwest of the subject property and was listed on the National Priority List (Superfund) in 1989. Investigation of this Superfund site is ongoing, but TCE, PCE, and cis-1,2-dichloroethene have been detected in monitoring wells on the AFB at levels that exceed California drinking water standards.
- An environmental database review identified three leaking petroleum UST sites to the north of the Property which had known impacts on the local aquifer.
- The eastern portion of the Property was used for heavy equipment repair for over twenty years. This use included an equipment wash area with an underground clarifier and leach lines to the west of the repair garage. Moderate soil staining in this area was observed in 2003 but was no longer visible when Stantec visited the Property in 2006.
- The western portion of the Property (the Site) was used by an auction company for storage of heavy equipment. Extensive areas of soil staining were observed during the 2006 Phase I ESA site reconnaissance.

In February 2019, Intertek conducted an additional Phase II ESA which included the following:

- Completion of seven soil borings and conversion of four of the borings to permanent groundwater monitoring wells (MW-1 through MW-4) in the northern portion of the Property. Monitoring wells MW-3 and MW-4 are located on the Site.
- Collection of three soil samples from a soil boring (SB-1) located in the fenced lot north of the suspected dry cleaner during the completion of monitoring well.
- The installation of three temporary groundwater monitoring wells and soil vapor probes in the median of Alessandro Boulevard (SB-1/SV1 through SB-3/SV3).

The results for the Phase II ESA indicate the following:

- A source of the PCE was not located during the investigation
- The presence of PCE in groundwater at equivalent concentrations on the northern portion of the property.
- Groundwater flow on the northern portion of the property is generally to the north.
- **Soil results:** No VOCs were detected at concentrations above the laboratory's reporting limits or above the California Human Health Screening Levels (CHHSLs)
- **Groundwater results:** PCE was detected in three of the samples at concentrations above 5  $\mu\text{g/L}$ , the Cal EPA and US EPA Maximum Contaminant Level (MCL) (7.8  $\mu\text{g/L}$  in MW-1, 8.3  $\mu\text{g/L}$  in MW-2, and 8.4  $\mu\text{g/L}$  in MW-3,

respectively). Results for samples collected from B-1 through B-3 indicated concentrations of PCE in all samples with 4.3 ug/L in B-1, 18 ug/L in B-2, and 6.0 ug/L in B-3. Results for wells B-2 and B-3 are above Cal EPA and US EPA MCL.

- **Soil Vapor results:** Laboratory results indicated the presence of several volatile organic compounds (VOCs) (acetone, benzene, bromoform, 2-butanone, carbon disulfide, chloromethane, cyclohexane, dibromochloromethane, dichlorodifluoromethane, ethanol, ethylbenzene, n-heptane, n-hexane, 2-hexanone, methylene chloride, 2-propanol, propylene, toluene, trichloroethene (TCE), 1,2,4-trimethylbenzene(TMB), 1,3,5-TMB, m&p-xylene, and o-xylene) at concentrations above the laboratory's Reporting Limits (RLs), but below Office of Solid Waste and Emergency Response (OSWER's) Vapor Intrusion Screening Levels (VISL) for residential and commercial sub-slab soil. Other substances such as bromodichloromethane were detected above VISL for residential but not commercial sub-slab soil at 5 ft bgs in all borings and at 15 ft bgs in B-1. Chloroform was found to be above both residential and commercial sub-slab soil in all three soil borings and at 15 ft bgs in soil boring 3. PCE was detected at concentrations above residential VISL but below commercial levels in the soil gas sample collected in soil boring 2 at 15 ft bgs.

### **Work Plan Addendum for Phase II Environmental Site Assessment, Terraphase, July 14, 2020 (Revised August 18, 2020)**

The work plan was submitted to the DTSC to conduct supplemental site investigation activities under regulatory oversight from the DTSC in accordance with the Voluntary Cleanup Agreement (VCA) for the Site. Andland entered into a Standard VCA with the DTSC on August 8, 2019 for the assessment and remediation of the environmental impacts at the Site.

### **Seepage Pit Assessment Report, Alessandro Properties, Terraphase, May 24, 2021.**

This report included information on Terraphase's March and April 2020 investigation, in which the primary objective was to locate and delineate PCE-impacted soil and to remove the PCE source. Based on their investigation, the potential source of the VOCs was suspected to be located between Charlebois Liquor (located across Alessandro Boulevard from the Site) and the northern portion of the Property.

The investigation included:

- Installation of eight new dual-nested vapor probes (SV-01 through SV-08 [two vapor probes SV-03 and SV-07 are located on the Site]) and completion of three borings for grab groundwater sampling and soil vapor sampling probes (TB-01 through TB-03).
- A total of eight Membrane Interface Hydraulic Profiling Tool (MiHPT) borings (MIP-01 through MIP-08) and subsequently 19 confirmation soil and grab groundwater borings were completed in the vicinity of the suspected former dry cleaner building.

The results for the investigation indicate the following:

- PCE exceeded the DTSC-screening level (SL) for PCE in soil vapor in SV-01 through SV-05. PCE concentrations in SV-06 through SV-08 were either below the DTSC SL or non-detect. It should be noted that PCE was detected in SV-03 in the deeper 15-foot probe, which is located on the northern side of the Site. Concentrations of PCE decreased with distance from the location of the suspected former dry-cleaner.
- MiHPT readings indicated elevated electron capture detector (ECD), PID and flame ionization detector (FID) responses from 4 to 8 ft bgs and from 12 ft bgs to each boring respective depth. However, the results of confirmation soil samples did not identify a PCE source(s) in the soil causing the elevated soil-vapor concentrations.
- PCE was detected in groundwater samples ranging from 10 to 13 µg/L. PCE was not detected in wells MW-02 or well MW-04 (which is a well on the northern portion of the Site).

Though the presence of PCE was confirmed, Terraphase concluded they were not successful in identifying the location of the PCE in the soil that is presumably leading to the elevated concentrations on the northern portion of the



Site. As a result of the investigation findings, Terraphase submitted a Work Plan Addendum to the DTSC to conduct test pit excavations and shallow soil sampling in an attempt to find and remove the VOC impacted soil at the property.

From October through November 2020, Terraphase conducted the test pit excavations in the vicinity of the suspected former dry cleaner building. During this excavation Terraphase uncovered several buried structures suspected to have been associated with the former dry cleaner operations, including a concrete clarifier and a 29-foot deep seepage pit. However, based on none of the concentrations exceeding the UE EPA RSLs or DTSC-SLs, in soil samples, Terraphase concluded that the source of PCE concentrations was not identified in the test pit soil samples.

In March 11 and 12, 2021 additional investigations were performed in the vicinity of the seepage pit. Based on the results, Terraphase concluded that the past use of the seepage pit did not appear to have “seriously” impacted the soil and was not the source of the elevated VOCs in soil vapor.

Copies of the previous reports are included in Appendix J. Previous sample locations are shown on Figure 4.

## **4. Site Reconnaissance**

On May 26, 2021, Karen Gale and Kristina Hill of GHD completed a reconnaissance of property and wooden shed that comprise the Site. The visit included a reconnaissance of the Site and Site structure, visual observations of adjoining properties as viewed from the Site and surrounding roadways, and an interview with Mr. Tom Koss, the property owner. The interview was conducted using a prepared questionnaire covering environmental and other Site-related topics. GHD employs a systematic approach to the Site reconnaissance process that seeks to obtain information indicating the likelihood of identifying RECs in connection with the Site, including both exterior observations and those associated with the interior of structures, as applicable on the Site. Any significant obstructions or limitations encountered during the Site reconnaissance were previously identified in Section 1.

### **4.1 Utility Services**

According to Mr. Koss, there are no utility services to the Site. An underground pipeline oriented east-west and located 15 feet below ground surface crosses the middle of the Site and is filled with inert nitrogen. A gas vent stack with a sign located near the west-center of the Site was observed, indicating the gas line belongs to Questar Southern Trails Pipeline (Queststar). On July 7, 2021, Queststar was contacted regarding the pipeline. According to Mr. Larry Stephey, Operations Supervisor with Queststar, the pipeline was formerly a crude oil pipeline that Queststar purchased to use for natural gas; however, the line was filled with nitrogen and was never converted to natural gas.

According to Mr. Koss, no water supply, oil/gas, irrigation, or dry wells are currently or were historically present on the Site. No evidence of any water supply, oil/gas, irrigation, or dry wells was observed by GHD during the Site reconnaissance. Monitoring wells are present on the Site. No gas or oil wells or water supply wells are depicted on the Site in the EDR Radius Map report or on the NPMS website.

According to Mr. Koss, no septic systems are currently or were historically present on the Site. No evidence of any septic systems was observed by GHD during the Site reconnaissance.

Properties in the area are serviced by municipal water and sewer, natural gas and electricity.

### **4.2 Underground Storage Tanks (USTs)**

According to Mr. Koss, no USTs are currently located at the Site or are known to have previously been located at the Site. No obvious evidence of USTs (i.e., vent pipes, fill ports) was observed by GHD during the Site reconnaissance. The Site is not listed in the databases reviewed as having any USTs or releases therefrom.

### **4.3 Aboveground Storage Tanks (ASTs)**

According to Mr. Koss, no ASTs are currently or have historically been located at the Site. GHD observed no evidence of current or former ASTs during the Site reconnaissance. The Site address is not listed in the AST database reviewed.

### **4.4 Raw material and Chemical Use and Storage**

The Site is currently predominantly vacant with the exception of the semi-truck trailers and a small wooden shed located near the northeastern corner of the Site, which was observed by GHD to contain approximately fifteen 50-pound bags of salt. Mr. Koss was unaware if the semi-truck trailers were empty. The salt did not appear to be associated with Site operations. No evidence of a release from the bags was observed by GHD. No other raw materials or chemicals were observed at the Site by GHD during the Site reconnaissance.

### **4.5 Non-hazardous Waste**

Based on observations during the Site reconnaissance, no non-hazardous waste is currently generated on Site.

An approximately 400 cubic yard stockpile primarily consisting of soil, but also including metal fencing and broken concrete pieces was observed in southeastern corner of the Site. According to Mr. Koss, the stockpiled soil along with the fencing and concrete was generated from clearing the Site grounds over time. No staining or obvious evidence of a release to the environment was noted in the observable portions of the stockpile during the Site reconnaissance.

According to Mr. Koss, no non-hazardous wastes have been disposed on Site. No other evidence of the on-Site disposal of non-hazardous waste was observed by GHD during the Site reconnaissance or in the aerial photographs reviewed.

### **4.6 Hazardous Waste**

According to Mr. Koss, the Site does not currently generate any hazardous wastes. No evidence of the on-Site generation or management of hazardous waste was observed by GHD during the Site reconnaissance.

The Site addresses are listed in the RCRA-SQG, HAZNET, HWTS, FINDS, and ECHO databases under C5 Equipment, Industrial Parts, Inc, and Tractorland Equipment, and Extect USA, Inc.

### **4.7 Wastewater/Sewers**

Based on observations during the Site reconnaissance, no wastewater is generated or discharged on Site.

### **4.8 Stormwater**

Stormwater generated at the Site consists of precipitation runoff, which infiltrates undeveloped Site surfaces or flow by sheetflow to an on-Site stormwater pond. A corrugated metal drain on the east side of the Site empties stormwater into a surface depression on the mid-eastern side of the Site. At the time of the Site reconnaissance, the seasonal pond was dry. No pooling of water, distressed vegetation or stained soil was observed in this area.

No evidence of outdoor storage of materials or industrial activity with the potential to impact stormwater runoff quality was observed by GHD during the Site reconnaissance with the exception of the stockpile described in Section 4.5.

### **4.9 Air Emissions**

According to Mr. Koss and based on GHD's observations at the time of the Site reconnaissance, air emissions sources are limited to vehicle exhaust from trucks entering and exiting the Site.

## 4.10 Polychlorinated Biphenyls (PCBs)

Based on GHD's observations at the time of the Site reconnaissance, a pole-mounted transformer was observed at the Site. No label providing information on the presence/absence of PCBs was observed. No staining or evidence of any leakage of dielectric fluid was observed in the vicinity of the transformer at the time of the Site reconnaissance. The transformer is owned by the utility and the utility would be responsible for any reporting, inspections, testing, or release response.

## 4.11 Spills/Releases

According to Mr. Koss, no spills or releases of hazardous substances or petroleum products have occurred at the Site. The Site is not listed in the ERNS or SPILLS databases.

The Site is listed in the ENVIROSTOR and VCP databases as Alessandro Properties with an active status (Facility ID no. 60002840). Information regarding environmental investigations at the Site and the adjacent property are detailed in Section 3.7.

The Site is mapped in the EDR Radius Map Report as part of the March AFB property, which is listed in the DOD and NPL databases. Refer to Section 3.6 for further details.

No obvious evidence of any spills or releases of hazardous substances or petroleum products was observed by GHD at the time of the Site reconnaissance. According to a 2006 Stantec Phase I ESA, the eastern portion of the property was used for heavy equipment repair for over twenty years. This use included an equipment wash area with an underground clarifier and leach lines to the west of the repair garage. Moderate soil staining in this area was observed in 2003 but was no longer visible when Stantec visited the property in 2006. Additionally, the western portion of the property (the Site) was used by an auction company for storage of heavy equipment. Extensive areas of soil staining were observed during the 2006 Phase I ESA site reconnaissance.

No evidence of any exterior staining or distressed vegetation was observed during the Site reconnaissance.

## 4.12 CERCLA Liability Potential

The Site is not listed on the NPL or in the SHWS database. The Site has never defended any environmental-related claims or litigation asserted by any governmental agency or third party and no potential claims or litigation presently exist to the best knowledge of Mr. Koss. According to Mr. Koss, the Site has never received notification from any government agency or third party of liability as a potential responsible party for any hazardous waste treatment, storage, or disposal site.

# 5. Limited Phase II ESI/Subsurface Assessment

The purpose of the Limited Phase II ESI is to evaluate potential environmental concerns identified during the Phase I ESA. The Limited Phase II ESI was conducted under the guidance of a GHD California licensed professional geologist. The Limited Phase II ESI include the following scope of work:

- Health and Safety Plan (HASP): GHD prepared a Site-specific HASP to provide health and safety guidance during the completion of the field work. The plan was kept on Site during the field activities and signed by all workers and visitors.
- Procuring subcontractors: GHD procured subcontractors to perform drilling, private utility location services, and laboratory analytical services.

- Underground Utility Location: GHD marked the proposed well locations and notify Underground Service Alert (USA) at least 48 hours prior to field activities to clear the soil boring locations with the public utility companies. Additionally, GHD utilized a private utility locator to help identify and locate subsurface lines prior to beginning the subsurface investigation activities.
- Soil borings/Soil and Grab Groundwater Sampling: GHD completed the drilling of nine borings using direct push drilling methods. The borings were completed to a maximum depth of 25 feet below ground surface (bgs). Grab groundwater samples were collected from six of the borings. Soil samples were also collected for screening and analysis.
- Soil Vapor Probe Installation and Sampling: GHD installed eight soil vapor probes at four locations. The probes stabilize for a minimum of 24 hours before vapor sampling. Soil vapor sampling was conducted in accordance with the Department of Toxic Substances and Control (DTSC) policy by GHD.
- Laboratory Analysis: Soil and groundwater samples were analyzed for volatile organic compounds (VOCs), total petroleum hydrocarbons (TPH) as gasoline and as diesel and polynuclear aromatic hydrocarbons (PAHs). Soil vapor samples were analyzed for VOCs.
- Preparation of this report.

## 5.1 Drilling and Sampling

Penske contracted GHD to oversee the completion of soil boring, temporary monitoring well installation, and to collect groundwater and soil vapor samples for subsequent laboratory analysis. GHD contracted drilling and sampling activities to MR Drilling Co (MR Drilling). The Limited Phase II ESI was conducted on June 8 through June 10, 2021.

Nine soil borings (SV-01, SV-02, SV-03, SV-04, SB-05, SB-06, SB-07, SB-08, and SB-09) were advanced at the Site utilizing a direct push drill rig. The locations of the soil borings are illustrated on Figure 3. Activities conducted during the Limited Phase II ESI included the following tasks.

- GHD marked the proposed drilling locations and notified Underground Service Alert (USA) at least 48-hours prior to field activities to clear the soil boring locations with the public utility companies. Additionally, GHD utilized a private utility locator to help identify and locate subsurface lines prior to beginning the subsurface investigation activities.
- GHD oversaw the completion and sampling of six temporary groundwater monitoring wells using direct push drilling methods to a maximum depth of 25 feet bgs. The work was conducted by a C-57 licensed driller. The top 5 feet bgs at each boring location was cleared by hand auger to confirm any underground utilities or obstructions that may not have been identified through the pre-field utility clearance procedures were avoided. Soil samples collected during the completion of each boring were screened using a photoionization detector (PID) and logged by a qualified geologist. The temporary monitoring wells were located in proximity to the former areas of concern (former dry cleaner, former petroleum pipeline) and in the footprint to the proposed Penske buildings. The temporary monitoring wells were set with a 10-foot length of screen and were installed 5 to 9 feet into first encountered groundwater. GHD collected grab groundwater samples from six soil borings/temporary wells using low flow methodology. The soil and groundwater samples were labeled and packaged after sampling and sent to Eurofins/Environmental Testing America in Pensacola, Florida, a California-certified analytical laboratory, under chain-of-custody for analysis.
- GHD installed 8 soil vapor probes to perform a soil vapor survey at the Site. GHD installed the probes at 2 locations within the footprint of each of the two proposed buildings. The probes were installed at depths ranging from 4.5 to 9.5-feet bgs in each location. The soil vapor sampling was conducted in accordance with the Advisory- Active Soil Gas Investigations dated July 2015, prepared by Department of Toxic Substances Control (DTSC). Soil vapor probes were drilled using a direct-push drill rig to a total depth of approximately 10 feet bgs.
- GHD used 100 percent laboratory certified 1-liter Summa™ canisters to collect vapor samples. Prior to collecting samples, a closed-circuit sampling train was created by attaching the sample Summa™ canister in series with a purge Summa™ canister via a steam cleaned, stainless steel manifold. A “shut in” test was performed prior to connecting the sampling equipment to the vapor probe tubing. This test was performed by sealing all openings to

ambient air, opening the purge Summa™ canister to establish a vacuum inside the sampling train and waiting for at least 2 minutes to ensure the vacuum remained stable over time. The shut-in test reduces the potential for ambient air to dilute the soil vapor samples. Once the sampling train passed the “shut in” test, it was connected to the probe tubing. Using the same flow rate as is used during sampling, approximately three well annulus volumes were purged from the sampling tubing, dry bentonite crumbles and sand pack using a purge Summa™ canister before sample collection began.

Leak testing was performed during sampling using helium, in accordance with the *DTSC Advisory – Active Soil Gas Investigation* guidance document, dated July 2015. The vapor probe vault, probe tubing, and entire sampling train were enclosed within a shroud. The helium concentration inside the shroud was maintained above 30 percent helium and quantified using a helium meter.

The initial vacuum of the canister (approximately 30 inches of mercury) was measured and recorded on the field data sheet prior to collecting a soil vapor sample. The initial vacuum of each Summa™ canister was used to draw the soil vapor through the flow controller until a residual vacuum of approximately 5 inches of mercury was observed on the vacuum gauge. This measurement was recorded on the data sheet. An air flow regulator was used to keep purge and sampling flow rates at less than 200 milliliters per minute to minimize VOC stripping and ambient air intrusion. The Summa™ canisters were labeled and packaged after sampling and sent to Eurofins Air Toxics in Folsom, California, a California-certified analytical laboratory, under chain-of-custody for analysis.

Soil vapor probes were allowed to stabilize up to 24 hours before vapor sampling.

- All soil cuttings were backfilled into the borings to the extent possible.

## 5.2 Stratigraphy

In general, during the Limited Phase II ESI, sand and silty sands were observed from the surface to approximately 25 feet bgs. Groundwater was encountered during drilling at depths ranging from approximately 13.5 to 23 feet bgs in borings SB-01 to SB-05. Groundwater was not encountered in boring SB-08, which met refusal at 16 feet bgs. Static groundwater ranged from approximately 11.5 to 15 feet bgs. Soil boring logs are provided in Appendix K.

## 5.3 Laboratory Analysis

Two soil samples, six groundwater samples and eight soil vapor samples were collected and submitted for laboratory analysis. Soil and groundwater samples were analyzed for VOCs, TPH as gasoline (TPHg) and as diesel (TPHd) by EPA Method 8260 and PAHs by EPA Method 8270. Soil vapor samples were analyzed for total compound list volatile organic compounds (TCL VOCs) by EPA Method TO-15 and helium by ASTM - 1946. Analytical laboratory reports are provided in Appendix L.

## 5.4 Limited Phase II ESI Results

Soil, groundwater, and soil vapor samples were compared to the San Francisco Bay Regional Water Quality Control Board, Tier 1 Environmental Screening Levels (ESLs, Rev. 2, 2019). Cumulative soil results are included in Table 1.

Soil samples were screened for VOCs in the field with a PID. Concentrations ranged from ND to 0.1 parts per million. Two soil samples collected from boring SB-08, since groundwater was not able to be sampled as refusal was encountered during drilling, were analyzed for VOCs, TPHg, TPHd, and PAHs. Results indicated that most contaminants were not detected at concentrations above the laboratory reporting limit. None were detected above the ESLs.

Groundwater samples were analyzed for VOCs, TPHg, TPHd, and PAHs. Results indicated that except for TPHg (126 µg/L) in TW-5 and tetrachloroethene (PCE, 6.29 and 1.47 µg/L) in TW-1 and TW-3, respectively, the concentrations were below the ESLs. The TPHg concentration was located on the east side of the Site in the vicinity of the drain and

former crude oil pipeline. The PCE concentrations are located in the northeast portion of the Site and are the closest to the suspected former dry cleaner. Cumulative groundwater results are included in Table 2. A site map showing the proposed future site layout and the groundwater analytical results detected are included in Figure 5.

Soil vapor samples were analyzed for TCL VOCs and helium. A partial summary of results is presented below. Benzene concentrations ranged from below laboratory reporting limits to 32 µg/m<sup>3</sup> and were present in the soil vapor samples collected from the north half of the Site. The higher concentrations were detected in the deeper 10-foot soil vapor samples. PCE was detected at concentrations above ESLs in all soil vapor samples collected. The concentrations were highest in the shallower 5-foot samples in the northern most soil vapor samples and highest in the deeper samples in the soil samples collected from the middle of the Site. Chloroform was detected above laboratory reporting limits in one soil vapor sample (SV-01-S) at 9.032 µg/m<sup>3</sup> which is above the ESL. Cumulative soil vapor results are included in Table 3. A site map showing the proposed future site layout and the soil vapor analytical results are provided in Figure 6.

| Vapor Probe ID | PCE<br>(µg/m <sup>3</sup> ) | Benzene<br>(µg/m <sup>3</sup> ) | Chloroform<br>(µg/m <sup>3</sup> ) |
|----------------|-----------------------------|---------------------------------|------------------------------------|
| SV-01-D        | <b>26</b>                   | <b>24</b>                       | <6.2                               |
| SV-01-S        | <b>130</b>                  | <b>4.1</b>                      | <b>9.032</b>                       |
| SV-02-D        | <b>110</b>                  | <b>32</b>                       | <13                                |
| SV-02-S        | <b>190</b>                  | <14                             | <21                                |
| SV-03-D        | <b>76</b>                   | <b>30</b>                       | <5.6                               |
| SV-03-S        | <b>17</b>                   | <3.5                            | <5.3                               |
| SV-04-D        | <b>150</b>                  | <14                             | <22                                |
| SV-04-S        | <b>53</b>                   | <3.5                            | <5.3                               |
| ESL            | 15                          | 3.2                             | 4.1                                |

PCE Tetrachloroethene  
 µg/m<sup>3</sup> Micrograms per cubic meter  
 < Indicates constituent was not detected at or above laboratory reporting limit.  
 San Francisco Bay Regional Water Quality Control Board, Tier 1 Environmental Screening Levels (ESLs, Rev. 2, 2019)  
**BOLD** = concentrations exceeding the ESLs.

## 5.5 Findings and Opinion

Based on the Phase I ESA and Limited Phase II ESI, the following findings were identified with the Site:

- Potential Agricultural Chemical Impacts from Historical Applications:** Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have historically been used on the Site. Information regarding historical use, storage or application rates is not reasonably ascertainable. No information was found to suggest that agricultural chemicals were not applied in accordance with manufacturer recommendations. Application of agricultural chemicals for intended use in accordance with manufacturer’s recommendations is not considered a release; therefore, potential residuals, if any, do not constitute a REC. It should be noted that the potential presence of agricultural chemicals may have resulted in Site impairment that may have or could result in adverse impact to Site soil and groundwater and consideration should be given to the potential presence of these chemicals and possible impacts therefrom when evaluating BER and future land use of the Site.
- Historical On-Site Structures:** Based on a review of historical documents, commercial or industrial buildings historically were located on the northwest portion of the Site. Based on the review of city directories, the Site was occupied by: Sundial Camper in 1976 and 1980; Tractorland between 1992 and 2017; Mark Gorin & Associate (auctioneers) and Parts West in 1995 and 1995; P&D Equipment RPR and South CST Portable in 1992; Tec

Storage in 1995; Yucaipa Towing in 2014; and C5 Equipment Rentals in 2017. Specific information regarding the operations conducted by these entities was not reasonably ascertainable. No information was available regarding demolition of the structures, potential USTs, potential ASTs, water supply, chemical use/storage, solid waste generation, or potentially hazardous waste generation. No evidence was found to suggest a release of hazardous substances or petroleum products associated with activities conducted at the former structure has occurred, nor was any evidence found that operations conducted at the former structure have impacted soil and groundwater at the Site. The mere presence of an historical structure on the Site does not constitute a REC. Based on the absence of information pertaining to the demolition of the buildings, it is possible that remnants may remain in the subsurface which should be considered when evaluating BER and future land use of the Site.

3. **Abandoned Crude Oil Pipeline:** The Site has an underground pipeline that runs from west to east through the central portion of the Site. The line was formerly operated by ARCO Four Corners as a crude oil pipeline from approximately the 1960s to 1999. It was deactivated using nitrogen in 2001. No other information pertaining to the pipeline (i.e., owner, age, releases) was available for GHD's review, nor was any information found to suggest that any releases from the pipeline occurred on or near the Site. The mere presence of a crude oil pipeline on the Site does not constitute a REC. The presence of the oil/gas pipeline should be considered when evaluating BER and future land use of the Site.
4. **On-Site Groundwater and Soil Vapor Impacts:** A former dry cleaner reportedly operated in a building adjoining the Site to the northeast in the 1950s or 1960s. Details of the business are unknown. Chlorinated VOCs have been detected in soil, groundwater and soil vapor samples collected during previous investigations in the vicinity of the former dry cleaner on the adjoining properties and the Site. Analytical results from GHD's Limited Phase II ESI on the Site indicate that PCE and TPHg were detected in groundwater samples, and PCE, chloroform, and benzene were detected in soil vapor samples at concentrations exceeding the ESLs. The presence of these compounds in groundwater and soil vapor at the Site represents a REC.
5. **March AFB:** March AFB is located within 0.5-miles south of the Site and was listed on the National Priority List (Superfund) in 1989. Investigation of this Superfund site is ongoing, but TCE, PCE, and cis-1,2-dichloroethene have been detected in monitoring wells on the AFB at levels that exceed California drinking water standards. This site is listed on NPL, SEMS, US ENG CONTROLS, US INST CONTROLS, ROD, PRP, and RCRA-LQG databases, the boundaries of which include the Site in the EDR Radius map report. According to the U.S. EPA website, "*The 7,123-acre March Air Force Base (AFB) has been used for aircraft maintenance and repair, refueling operations, and training activities since 1918. Facility operations contaminated soil and groundwater with hazardous chemicals. Three zones of groundwater contamination beneath the base were identified and wells on base were shut down in the late 1980s and were later properly destroyed. Groundwater contamination has migrated to wells located off base that are no longer in use. However, a groundwater containment system has been installed to prevent off-site groundwater migration and the off-site plume is being monitored. The site's long-term cleanup is ongoing.*" The U.S. EPA website also indicated that "*Operation of the Groundwater Extraction and Treatment System (GETS) began in April 1992. In September 1996, the GETS was initially expanded as the Enhanced Groundwater Extraction System (EGETS) to include 14 extraction wells and five injection wells. During December 2019, drilling and well installation for six new extraction wells for the EGETS2 expansion began and it became operational in July 2020.*" Information regarding the locations of the wells or groundwater flow was not included on the U.S. EPA website; however, the 2018 Roux report indicated that regional groundwater flow is to the southeast. Information regarding potential soil gas impacts was not provided on the U.S. EPA website. The website also indicated "*Most of the sites either have been cleaned up or determined that no clean up was needed. One landfill was capped (Site 4) and other landfill material was moved to a properly constructed landfill (Site 6). A groundwater interdiction system at the base boundary (EGETS) is operating. The groundwater plumes are generally shrinking. A Soil Vapor Extraction system is removing contaminants from Site 7. Emerging contaminants, perfluorinated compounds including PFOA/PFOS, are being investigated in soil and groundwater.*" Site personnel were unaware of any reported impacts to the Site from the March AFB property. Based on the location of the March AFB to the Site and regional groundwater flow direction, the likely impacts to the Site constitute a REC. The March AFB is located to the southwest of the Site and regional groundwater flow is reportedly to the southeast; however, the extent of the plume associated with the March AFB could not be confirmed at the time of this Phase I ESA, which represents a significant data gap.

6. **Historical Site Operations:** The Site was used by an auction company for storage of heavy equipment and also for tractor and parts sales. No staining or obvious evidence of a release to the environment was noted in the observable portions of the surface soil during the Site reconnaissance. No reasonably ascertainable documentation was found to suggest that the former operations at the Site have caused any hazardous substances or petroleum products to impact the Site and the Site is not listed in the databases searched as having any releases to the environment. The mere presence of the Site usage for large equipment storage/sales not constitute a REC. However, based on these historical operations, the potential for hazardous substances or petroleum products in the material should be considered when evaluating BER and future land use of the Site.
7. **Historical Staining:** Extensive areas of soil staining were observed during the 2003 Phase I ESA but not during a 2006 Phase I ESA site reconnaissance. No documentation was reasonably ascertainable to demonstrate the observed staining had been evaluated or remediated. No staining or obvious evidence of a release to the environment was noted in the observable portions of the surface soil during the Site reconnaissance. The presence of historical stained soil constitutes a REC.
8. **Potential Impacts from Stockpile:** An approximately 400 cubic yard stockpile primarily consisting of soil, but also including metal fencing and broken concrete pieces was observed in southeastern corner of the Site. According to Mr. Koss, the stockpiled soil along with the fencing and concrete was generated from clearing the Site grounds over time. No staining or obvious evidence of a release to the environment was noted in the observable portions of the stockpile during the Site reconnaissance. No information regarding sampling or other assessment of potential contaminants in the soil was available for GHD review at the time of the Site reconnaissance and no stained soil or solid waste was observed in the soil pile. No reasonably ascertainable documentation was found to suggest that the stockpile has any hazardous substances or petroleum products present. The mere presence of a soil pile does not constitute a REC. However, based on the unknown source of the soil, the potential for hazardous substances or petroleum products in the material should be considered when evaluating BER and future land use of the Site.

## 5.6 Conclusions

GHD has performed a Phase I/II ESA in conformance with the scope and limitations of the Standard of the Site located at 14044 Old 215 Frontage Road in Moreno Valley, California. Any limiting conditions to, or deletions from this practice are described in Section 1 of this report.

### 5.6.1 Recognized Environmental Conditions

The following RECs, as described above, were identified to exist in connection with this Site:

- On-Site Groundwater and Soil Vapor Impacts
- March AFB
- Historical Staining

### 5.6.2 Business Environment Risk

The following BERs, as described above, were identified to exist in connection with this Site:

- Potential Agricultural Chemical Impacts from Historical Applications
- Historical On-Site Structures
- Historical Crude Oil Pipeline
- Historical Site Operations
- Potential Impacts from Stockpile



## 5.7 Data Gaps/Data Failure

A data gap, as defined in the Standard, is an absence of information that affects the ability of the environmental professional to identify RECs. Data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met. Data failure is not uncommon in trying to identify the use of the Site at 5-year intervals back to first use or 1940 (whichever is earlier).

The following data gap/data failures was identified in this Phase I ESA:

- The lack of review of documentation related to the extent of contamination associated with the March AFB relative to the Site represents a significant data gap and could impact the conclusions of this report.

## 6. Environmental Professional Statement

This Phase I/II ESA was completed by or under the direct supervision of an Environmental Professional (EP), who to the best of our professional knowledge and belief, meets the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. The EP has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed all appropriate inquiries (AAI) in conformance with the standards and practices set forth in 40 CFR Part 312. Under the final AAI Standard, certain aspects of the Phase I ESA (interviews, on-site visual reconnaissance, the historical records review, and the search for environmental liens) may require an update if the timeframe between their completion and acquisition of the Site exceeds 180 days.

## 7. References

- ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process
- The EDR Radius Map™ Report with GeoCheck®, 21921 Alessandro Blvd, California, dated April 29, 2021
- Certified Sanborn® Map Report, 21921 Alessandro Blvd, California, EDR, dated April 29, 2021
- The EDR Aerial Photo Decade Package, 21921 Alessandro Blvd, California, dated April 29, 2021
- The EDR-City Directory Abstract, 21921 Alessandro Blvd, California, dated April 29, 2021
- EDR Historical Topographic Map Report, 21921 Alessandro Blvd, California, dated April 29, 2021
- The EDR Environmental Lien Search, Parcel Number: 297-100-066, Alessandro Blvd, California, dated April 29, 2021
- Intertek PSI, 2019, Phase II Groundwater Investigation Report, Gateway Business Park, 14044 Old 215 Frontage Road, and 21839 and 21921 Alessandro Boulevard, Moreno Valley, California, January 3
- Intertek PSI, 2019, Limited Environmental Site Investigation Report, Gateway Business Park, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard Moreno Valley, California, March 15
- Personal interviews with Tom Koss at the Site on May 26, 2021
- Roux Associates, Inc, 2018, *Phase I Environmental Site Assessment*, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard, Moreno Valley, Riverside County, California, September 7.
- Roux Associates, Inc, 2018, Draft Limited Phase II Site Investigation Report, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard Moreno Valley, California, November 29.

Terraphase Engineering, Inc. 2020, Work Plan Addendum for Phase II Environmental Site Assessment at the Alessandro Properties Site, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard, Moreno Valley, California, October 16, Revised December 24

Terraphase Engineering, 2021, Seepage Pit Assessment Report, Alessandro Properties, 14044 Old 215 Frontage Road and 21839, 21921 Alessandro Boulevard, Moreno Valley, California, May 24

DRAFT

All of Which is Respectfully Submitted,  
GHD

Karen Gale

Jennifer L. Quigley

DRAFT

# Figures