

APPENDIX

**DEPARTMENT OF
ENVIRONMENTAL HEALTH
APPROVAL LETTER FOR
PROPERTY MITIGATION
PLAN**



County of San Diego

GARY W. ERBECK
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
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RICHARD HAAS
ASSISTANT DIRECTOR

April 16, 2003

RECEIVED

APR 24 2003

Mr. Eric Crockett
Community Development Commission of National City
140 East 12th Street, Suite B
National City, CA 91950

EBS
SCS Engineers Co

Dear Mr. Crockett:

PROPOSED MITIGATION PLAN FOR THE CLEVELAND ASSOCIATES PROPERTY AND THE
FORMER CUYAMACA MEATS, INC. PROPERTY
SOUTH HARBOR DISTRICT REDEVELOPMENT PROJECT AREA
WORK PLAN APPROVAL
H23772-002

This letter is to notify you that we have received and reviewed the work plan prepared by Environmental Business Solutions (EBS), dated December 23, 2002, and the revised plan dated March 25, 2003, both entitled "Property Mitigation Plan For The Cleveland And Associates Property And The Former Cuyamaca Meats, Inc. Property".

The first document was sent to all agencies identified to have a potential interest in the project by participating in the Consultative Agency Meeting held in our offices on April 4, 2001. We requested written comments by January 24, 2003. Written comments were received from the California Integrated Waste Management Board (CIWMB), the San Diego Air Pollution Control District, the San Diego County Department of Environmental Health, and from the U. S. Fish and Wildlife Services. The comments were consolidated and a meeting held to discuss them with EBS and the National City Redevelopment Agency. As a result of the meeting a revised work plan, dated March 25, 2003, was distributed.

The South Harbor District Project includes the properties from the northern edge of Paradise Creek to the properties just north of Bay Marina Drive (24th Street). The work plan currently proposed includes only the properties south of Bay Marina Drive (APNs 559-117-14 and -15; and APNs 559-160-03, -09 and -21; and APN 559-160-110).

Based on prior Phase I and Phase II investigations, the area south of Bay Marina Drive was divided into four separate units, each defined as an Area of Concern (AOC 1, AOC 2, AOC 3 and AOC 4). The work plan outlines additional soil and groundwater investigation for each AOC to address unknowns and uncertainties. Additionally, the consolidation and capping of contaminated soil within each AOC is the only mitigation proposed at this time.

Provided that the information in the work plan submitted is true and accurate, it is approved with the following conditions:

- 1) All existing wells should be retained, with the exception of NMWB, which will need to be destroyed to conduct the mitigation in AOC 1.

The work plan proposes to destroy wells MW3, NMW1, NMW2, NMW3, NMWA and NMWC following site grading. These wells must be maintained until adequate sampling and chemical analysis can be conducted to properly evaluate conditions at the site. If groundwater monitoring is not complete and certain wells interfere with building pad construction the need to retain or relocate the well(s) can be negotiated.

- 2) If soil gas is deemed necessary in AOC 4, vapor samples over time will be required to evaluate the potential for volatile organic vapors to accumulate in overlying buildings in concentrations that would be of significant risk to human health.

The work plan proposes to sample groundwater in the existing wells in AOC 4, and if volatile organic compounds are detected a vapor risk analysis will be conducted. If the vapor risk fails using the dissolved concentrations in groundwater, a soil gas survey is proposed using multiple sample points and sampling them once. This is acceptable if the sampling is conducted three times over a period of three to four weeks to account for temporal variations. This would require that temporary probes be driven and removed three times. Consider using one or two permanent vapor wells instead to conduct the sampling, then destroy them once.

- 3) Vapor risk analysis may be required in other AOCs if elevated concentrations of volatile organic compounds, such as benzene or halogenated solvents are detected during the groundwater sampling and analysis events.

- 4) A groundwater monitoring well is needed in AOC 3 in the area of the former metal plating facility.

The well is needed to evaluate the potential for halogenated solvent use and potential release in the area. Our experience with other sites indicates that metal platers sometimes use solvents to degrease parts prior to plating and this often causes releases to soil and groundwater.

- 5) Additional soil sampling is needed in the area of AOC 3 in the building footprint outside of the metal plating facility identified.

The aerial photograph in Figure 3 of the work plan clearly shows a much larger building footprint than the plating facility. The potential for similar industrial uses in other parts of the site is high and must be investigated.

- 6) Prior to soil mitigation, a final grading plan and work plan must be submitted and approved for AOC 1.

It is my understanding that the CIWMB will be preparing these items.

- 7) Prior to soil mitigation, a Community Health and Safety Plan must be submitted and approved.

It is my understanding that the CIWMB will be preparing this item for AOC 1.

- 8) Prior to soil mitigation, a work plan for specific mitigation protocols and a Community Health and Safety Plan must be submitted for AOC 2, AOC 3 and AOC 4.

It is my understanding that the CDC will be responsible for these tasks.

- 9) Prior to final closure of the site, a plan for long-term maintenance of the engineered cap for the burn ash must be submitted and approved.

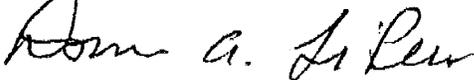
- 10) Submit documentation that the soil used to cap the burn ash is free of contamination, such as heavy metals, petroleum hydrocarbons, solvents, PCB's, etc.

- 11) Specific cleanup levels for groundwater remain to be established pending the outcome of additional soil and groundwater sampling.

The work plan states that the site is located in an area of high total dissolved solids (TDS) and therefore the groundwater is considered to have no beneficial uses. Groundwater beneath the site does have high levels of TDS; however, the groundwater basin plan does designate beneficial uses for groundwater in the area of the site.

If you have questions contact me at (619) 338-2244.

Sincerely,



DONN A. LIPERA, Project Manager
Site Assessment and Mitigation Program

DAL:kd

cc: Nasser Sionit, SAM

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- 5 -

April 16, 2003

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**POST-CLOSURE
MONITORING AND
MAINTENANCE PLAN**

Post-Closure Monitoring and Maintenance Plan

For

Marina Gateway Project

**Community Development Commission
of the City of National City**

**Prepared By
SCS Engineers**

November 2006

1 POST-CLOSURE RESPONSIBILITIES SUMMARY

- 1.1 Post-Closure Responsibilities
 - 1.1.1 Property Transfer Responsibilities
 - 1.1.2 Operational Responsibilities

2 INTRODUCTION

- 2.1 Objectives
- 2.2 Regulatory Oversight
 - 2.2.1 Cal-EPA Administering Agency
 - 2.2.1.1 Site Assessment and Mitigation Program
 - 2.2.1.2 Solid Waste Local Enforcement Agency
 - 2.2.2 California Integrated Waste Management Board
 - 2.2.3 San Diego Regional Water Quality Control Board
 - 2.2.4 United States Fish and Wildlife Service

3. BACKGROUND

- 3.1 Site Location
- 3.2 Site History
- 3.3 Current and Future Land Use

4. RESPONSIBLE PARTIES

- 4.1 Current Property Owners
- 4.2 Change of Ownership Notification Requirements

5. ENVIRONMENTAL MONITORING

- 5.1 Regulatory Requirements
 - 5.1.1 Groundwater Monitoring and Sampling Program
 - 5.1.2 Storm Water Monitoring Program
 - 5.1.3 Landfill Gas Monitoring Program

6. SITE MAINTENANCE AND MONITORING

- 6.1 Post-Closure Maintenance and Regulatory Compliance
 - 6.1.1 Site Security
 - 6.1.2 Grading of Fill Areas
 - 6.1.3 Site Maintenance
 - 6.1.3.1 Maintenance of Asphalt Cover

- 6.1.3.2 Maintenance of Unpaved Areas
- 6.1.3.3 Maintenance of Storm Drainage and Erosion Control
- 6.1.3.4 Maintenance of Landscaping
- 6.1.4 Leachate Control
- 6.1.5 Drainage/Erosion Control
- 6.1.6 Litter Control
- 6.1.7 Gas Control
- 6.1.8 Postclosure Land Use
- 6.2 Site Monitoring and Inspection Program

7. EMERGENCY RESPONSE PLAN

- 7.1 Introduction
 - 7.1.1 Regulatory Requirements
 - 7.1.2 Emergency Response Coordinator and Responsibilities
 - 7.1.3 Emergency Response Plan Revisions
 - 7.1.4 Equipment
- 7.2 Employee Training
- 7.3 Potential Hazards and Corrective Actions
 - 7.3.1 Vandalism
 - 7.3.2 Fires and Explosions
 - 7.3.3 Earthquakes
 - 7.3.4 Floods
 - 7.3.5 Failure of Dikes or Levees
 - 7.3.6 Surface Drainage Problems
 - 7.3.7 Waste Releases

8. REFERENCES

APPENDICES

Appendix A Deed Restriction

Appendix B Parking Lot Storm Water Best Management Practices

FIGURES

Figure 3-1: Site Vicinity Map

Figure 3-2: Current and Proposed Land Use Map

Figure 1-1: Paradise Valley Hospital Location Map

1.1 Post-Closure Responsibilities

This Post-Closure Monitoring and Maintenance Plan (PCMMP) describes the responsibilities and obligations of the property owner for post-closure monitoring and maintenance required for the former National City Dump (a.k.a. Davies Dump), a former burn ash disposal site (SWIS# 37-CR-0084) in National City, San Diego County, California (Site). There are two categories of responsibilities, property transfer and operational. These responsibilities are detailed as follows.

1.1.1 Property Transfer Responsibilities

The following property transfer responsibilities are required for the Site whenever there is a prospective change in ownership.

- The property owner must provide written disclosure to the prospective purchaser that there is a closed disposal site and the new property owner will be responsible for the post-closure maintenance and regulatory compliance.
- The property owner must inform the prospective purchaser that this PCMMP exists and that there is a use-restricting environmental Deed Covenant in effect.
- The property owner must notify the County of San Diego Solid Waste Local Enforcement Agency (LEA) and the California Integrated Waste Management Board (CIWMB) regarding any sale or transfer of the Site, in writing at least 45 days prior to the sale or transfer. The notification must include the name, address, and phone number of the new owner/operator.

1.1.2 Operational Responsibilities

The following operational responsibilities are required for the Site.

- The groundwater monitoring program must be continued for at least 2 additional quarters.
- The property owner must comply with City of National City and San Diego Regional Water Quality Control Board (RWQCB) storm water regulations.
- The property owner must provide a barrier and restricted access signage between the pedestrian pathway and the unpaved portions of the Site.
- The property owner must inspect the condition of the grading semiannually and after major rainfall events, and conduct any maintenance necessary to prevent ponding of water and moisture infiltration.

- The property owner must inspect the condition of the asphalt pavement, catch basins, surface drainage, vegetative cover, monitoring well, light standards, and security features semi-annually, and conduct any maintenance necessary.
- The asphalt pavement, drainage channels, catch basins, and pedestrian pathway must be swept and cleaned on a regular basis, trash receptacles will be provided, and storm water best management practices will be implemented.
- The landscaping on the Site will be installed in planter boxes. If the landscaping is changed, then only shallow rooting, low water usage plants will be utilized, and the irrigation system will be inspected and repaired as necessary so that there is not infiltration of irrigation water into the cap.
- The property owner must follow the procedures described in the Emergency Response Plan (ERP) in case of release of leachate.
- The property owner must appoint an individual with proper training and authority as ERP coordinator to oversee implementation of the ERP.
- Acts of vandalism will be reported to the police and the LEA, and corrected within seven days.
- Fires or explosions will be reported to the fire department and LEA, investigations and corrective actions will be initiated immediately, and a report will be submitted to the LEA within seven days.
- In case of significant earthquake, the Site will be assessed for damages and the LEA notified within 24 hours. A report documenting the damages and required repairs will be submitted to the LEA within seven days.
- In case of flood, the Site will be assessed for damages and the LEA notified within 24 hours. A report documenting the damages and required repairs will be submitted to the LEA within seven days. During the flood event, it may be necessary to divert flood waters away from waste disposal areas.
- In case of disruption of the cap and release of wastes, the ERP will cordon off the affected area of the Site to prevent access, take all necessary measures to prevent further release, properly characterize and dispose of wastes released, report the release to the LEA, and issue a written report to the LEA within seven days.

SCS Engineers (SCS) has prepared this PCMMP on behalf of the Community Development Commission of the City of National City (CDC) for the Site. The Site has been the subject of a remediation project managed by the CIWMB under the Solid Waste Disposal and Codisposal Site Cleanup Program pursuant to Public Resources Code (PRC) Section 48020 et seq. This PCMMP addresses long-term monitoring and maintenance of the Site after completion of the CIMWB-managed remediation project and approval of the Preliminary Closure Report issued to document completion of the Property Mitigation Plan (prepared by SCS and dated March 25, 2003) (PMP), which involves reconsolidating and encapsulating wastes on-site, and subsequent post-closure activities associated with the CDC's Marina Gateway Project (Project) within the Harbor District Redevelopment Area.

This PCMMP was approved by the Department of Environmental Health for the County of San Diego (DEH) as a condition for the "closure" of the Site, which was placed under DEH jurisdiction by the California Environmental Protection Agency (Cal-EPA) Site Designation Committee petitioned pursuant to the Uniform Agency Review Law. ***Compliance, by the owners of any and all portions of the Site, with the terms and conditions of this PCMMP is a requirement for the continued protection and benefits afforded by the Polanco Redevelopment Act (California Health and Safety Code sections 33459 et seq.)***

2.1 Objectives

The purpose of this PCMMP is to fulfill the requirements of Title 27 of the California Code of Regulations (27 CCR) set forth for inactive disposal sites that have not received closure certification pursuant to Section 21880 and are not subject to Article 2 Standards.

The objectives of this PCMMP are as follows:

- Identify all regulatory requirements and appropriate measures necessary to meet compliance standards.
- Provide a detailed plan for post-closure monitoring, inspections, and maintenance at the site to be implemented during the extent of the post-closure maintenance period.
- Evaluate long-term effectiveness of Site remediation efforts, including maintenance of engineered cap, and take any additional corrective actions necessary to maintain performance criteria.
- Enable regulatory agencies to readily assess whether or not specified post-closure monitoring and maintenance activities are being conducted in accordance with the approved PCMMP.

Wherever possible, specific sections of the 27 CCR Regulations have been cited within the text of PCMMP alongside the proposed compliance measures. The purpose of this is two-fold:

- Provide those individuals responsible for PCMMP implementation with an understanding of the regulatory basis for each of the plan provisions.
- Readily demonstrate to the regulators involved with the PCMMP review and approval how the PCMMP intends to meet the post-closure monitoring and maintenance requirements.

2.2 Regulatory Oversight

2.2.1 Cal-EPA Administering Agency

Pursuant to Health and Safety Code §§ 25260-25268, the DEH has been designated by the California Environmental Protection Agency (Cal-EPA) as the administering agency for environmental oversight of Site remediation efforts associated with the Project. There are two programs in separate divisions of the DEH that have regulatory oversight roles at this Site; these are the:

- Site Assessment and Mitigation (SAM) Program, Land & Water Quality Division.
- LEA, Community Health Division.

2.2.1.1 Site Assessment and Mitigation Program

The DEH SAM Program personnel are responsible for the review and approval of Site investigations, remedial actions, and the final PCMMP to ensure compliance with state and local laws. They are also required to consult with all other agencies that may have jurisdiction at the Site so that their respective regulatory requirements are satisfied. This PCMMP was adopted after DEH, in consultation with other interested stakeholders, determined that completion of the PMP had been documented and a letter approving the Property Closure Report issued, transferring SAM oversight authority for Site maintenance to the LEA. Mr. Donn LiPera, of the SAM, is the DEH contact for the Site, and can be reached at 619-338-2244.

2.2.1.2 Solid Waste Local Enforcement Agency

The DEH LEA is certified by the CIWMB to enforce state and local solid waste laws and regulations within its jurisdiction that encompasses the entire County of San Diego, except for the City of San Diego. The LEA will be responsible for reviewing the monitoring and maintenance of the Site as detailed in the PCMMP, but requests for approval of any subsequent revisions and updates to the PCMMP shall be made to the SAM. The LEA is also responsible for routine inspections of the Site for the duration of the post-closure maintenance period to ensure compliance with 27 CCR requirements.

2.2.2 California Integrated Waste Management Board

The CIWMB entered into an agreement with the CDC to investigate and remediate the former solid waste site pursuant to PRC §§ 40505 and 48024. The CIWMB’s Solid Waste Disposal and Codisposal Site Cleanup Program (AB 2136 Program) was responsible for directing the investigation and remediation efforts for the reconsolidation project at the Site. In addition, the CIWMB’s Closure and Technical Services Section is responsible for ensuring that the LEA is following prescribed site inspection and enforcement procedures during the post-closure maintenance period.

2.2.3 San Diego Regional Water Quality Control Board

The state of California is divided into nine regions, each with a separate RWQCB to enforce water quality regulations. The San Diego RWQCB has been consulted by the County DEH, the “administering agency” under the Health and Safety Code, in the development of the investigations of the Site, and the approval of the PMP by DEH to ensure water quality standards have been met.

2.2.4 United States Fish and Wildlife Service

Since Paradise Marsh is owned and maintained by the United States Fish and Wildlife Service (USFW), USFW was consulted in the development of the PMP and has provided input throughout this project so that this project would not result in increased degradation to Paradise Marsh. As approved, the PMP enhances Paradise Marsh by preventing erosion of the Site materials into the marsh, revegetating the Habitat Buffer with native species, and providing educational information regarding Paradise Marsh.

3.1 Site Location

The Site, a former burn ash disposal site, is located west of Interstate 5, north of Paradise Marsh (a unit of Sweetwater Marsh National Wildlife Refuge), and south of Bay Marina Drive in National City, San Diego County (see Figure 3-1). The Site is situated on a section of Paradise Marsh, owned and maintained by the USFW (assessor parcel number [APN] 559-160-15 and APN 559-160-16), and a portion of Marina Gateway, which comprises six parcels: the former Cleveland Associates property at 2501 Cleveland Avenue (APNs 559-117-14, 559-117-15, 559-160-03, 559-160-09, and 559-160-21) and the former Cuyamaca Meats property at 2510 Cleveland Avenue (APN 559-160-11).

3.2 Site History

The Site operated as a burn dump between the 1920s and 1950s. As was typical of dump operations at that time, salvageable materials, such as scrap metals, were removed from the refuse prior to its burning and disposal. The resultant burn ash was then periodically pushed out onto the bluff and adjacent inter-tidal wetlands at Paradise Marsh. Upon cessation of dump operations, the disposal site was graded and leveled and other businesses started operating on or adjacent to the area. These former businesses included a slaughterhouse, meat packing plant, auto wrecking yard, and an olive oil plant.

In 1949, the State of California, Department of Transportation (Cal-Trans) took a portion of the former burn dump under eminent domain for the construction of Interstate 5. With the creation of the Sweetwater National Wildlife Refuge in 1988, USFW took over ownership of the Paradise Marsh portion of the property along the southernmost boundary of the Site.

In 1998, the CDC acquired the industrial and commercial portions of the Site, which were incorporated into the Marina Gateway portion of the Harbor District Redevelopment Area.

3.3 Current and Future Land Use

The Site encompasses approximately 3.31 acres and extends from the Marina Gateway area south into the Sweetwater National Wildlife Refuge. As a result of the CIWMB-managed remediation project, the Site was regraded, contoured, capped with asphalt pavement or a minimum of 2-foot-thick clean fill soil cover, and revegetated with native plant species. Other recognized environmental conditions on the Site and adjacent portions of Marina Gateway were investigated and remediated, as necessary, to the approval of the DEH, and all activities were designed to support the proposed redevelopment project. The redevelopment project includes plans for a hotel and restaurant complex with adjacent parking facilities; and the creation of a 100-foot-wide Habitat Buffer zone (completed) and pedestrian walkway (completed), between the commercial property and the wildlife refuge, that extends from Bay Marina Way (Figure 3-2).

4.1 Current Property Owners

Currently, the CDC owns the northern part of the Site and adjacent portions of Marina Gateway, and USFW is trustee of the southern portion of the Site, known as part of the Paradise Marsh Unit of Sweetwater National Wildlife Refuge. The current property owners assumed responsibility for the monitoring and maintenance of their portions of the closed disposal site after the CIWMB completed the remediation project.

This PCMMP discussed the various restrictions and obligations that are imposed on the Site, including: Site security, grading of fill surfaces, Site maintenance, leachate control, drainage/erosion control, litter control, gas control, and post-closure land use. See *Chapter 5, Section 5.1 Post-Closure Maintenance and Regulatory Compliance* of this PCMMP for a further discussion of these requirements. The CDC has entered into an agreement with a prospective purchaser where those responsibilities are described and allocated.

The contact information for the CDC representative responsible for management of the closed disposal site is as follows:

Title:	Redevelopment Projects Manager
Address:	1243 National City Boulevard, National City, CA 91950
Telephone:	(619) 336-4255

The contact information for the representative responsible for maintaining USFW-owned portions of the Site is as follows:

Title:	Project Leader, San Diego National Wildlife Refuge Complex
Address:	2722-D Loker Avenue West, Carlsbad, CA 92008
Telephone:	(760) 930-0168

4.2 Change of Ownership Notification Requirements

The CDC is responsible for providing written disclosure to the prospective buyer that there is a closed disposal site on a portion of the property and that the new property owner will be responsible for post-closure maintenance and regulatory compliance as described herein. In addition, the CDC will require that the subsequent owner make and require this same disclosure to and for all potential future successors, to explicitly inform them of the existence of this PCMMP, and the related use-restricting environmental Covenant (described below) that will be recorded on the record of title for the Site and other portions of Marina Gateway.

A deed restriction for the capped portion of the Site will be recorded in the form of a Covenant and Agreement (Covenant) made by and between the CDC and the DEH, the “administering agency,” for the mitigation of environmental conditions at the property pursuant to Health and Safety Code sections 25260, et seq. The Covenant sets forth certain restrictions on the use of the property which are reasonably necessary to protect present or future human health or safety or

the environment as a result of the presence on the land of hazardous materials, as defined in the Health and Safety Code (For further information see Appendix B, Deed Restriction).

Title 27 CCR §21630 (Change of Owner, Operator, and/or Address) requires the property owner to also notify in writing both the LEA and CIWMB 45 days prior to any sale or transfer of the property. This notification must include the name, address, and phone number of the new owner/operator.

5.1 Regulatory Requirements

Based on Title 27 requirements, ongoing monitoring may be required at the Site for groundwater, storm water, and landfill gases (such as methane).

5.1.1 Groundwater Monitoring and Sampling Program

The current well locations are shown in Figure 3-2.

Based on the historical groundwater sampling data, the proposed groundwater monitoring wells, the five wells in Paradise Marsh located northwest of Paradise Creek (monitoring wells JMW1, JMW2, JMW3, JMW4, JMW5), and the surface sampling locations in Paradise Creek, should all continue to be sampled for volatile organic compounds (VOCs) in accordance with EPA Method 8260B and for metals in accordance with EPA Method 1640. The groundwater monitoring wells at the Site and in Paradise Marsh will be sampled on a quarterly basis for a minimum period of one year. At the end of the one year period, the continued need to conduct groundwater monitoring will be reevaluated based on the accumulated data. As of the date of this PCMMP, two quarters of monitoring have been completed.

5.1.2 Storm Water Monitoring Program

The future property owner/developer of Marina Gateway will be responsible for compliance with construction and operational storm water regulations enforced by the City of National City and San Diego RWQCB.

5.1.3 Landfill Gas Monitoring Program

Based on the available methane gas data for the Site which is discussed in the Property Closure Report, methane gas is not present at the Site at concentrations that require ongoing landfill gas monitoring, and therefore no ongoing landfill gas monitoring program and no landfill gas mitigation system are required.

6.1 Post-Closure Maintenance and Regulatory Compliance

The following sections identify the post-closure maintenance requirements found in Title 27 of the California Code of Regulations (27 CCR) and the measures to be taken to comply with these regulations.

6.1.1 Site Security (27CCR §20530)

The site shall be designed to discourage unauthorized access by persons and vehicles by using a perimeter barrier or topographic constraints. Areas within the site where open storage or ponding of hazardous materials occurs shall be separately fenced or otherwise secured as determined by the enforcement agency (EA). The EA may also require that other areas of the site be fenced to create an appropriate level of security.

A perimeter barrier to prevent entry and restricted access signage will be provided as necessary, where there is the potential for burn ash to be exposed and/or otherwise accessible to the public. The approved barrier requirements are illustrated in Figure 3-2, and include the unpaved portions of the Site which serve as the habitat buffer zone between public areas and the wildlife refuge. The restricted access signs will be constructed of a durable material, such as metal or plastic, and will be written in both English and Spanish. The signs will read: “No Trespassing – Sensitive Habitat Area.” The signage will also provide a local telephone number for emergency notification. All barriers and gates will be routinely inspected for structural damage, weathering, vandalism, and missing or damaged warning signs.

6.1.2 Grading of Fill Areas (27CCR §20650)

Covered surfaces of the disposal area shall be graded to promote lateral runoff of precipitation and to prevent ponding. Grades shall be established of sufficient slopes to account for future settlement of the fill surface. Other effective maintenance methods may be allowed by the EA.

The final grading plan is designed to prevent the ponding of water and to minimize moisture infiltration. The overall condition of the grading will be visually inspected on a semiannual basis (including one inspection before the rainy season) and after major rainfall events. If differential settlement is noted, such as ponding or low spots, then repair will be performed as necessary and maintenance will begin at the earliest time feasible, as described in the subsequent section on Site Maintenance.

6.1.3 Site Maintenance (27 CCR §20750)

The operator shall implement a preventative maintenance program to monitor and promptly repair or correct deteriorated or defective conditions with respect to requirements of the CIWMB standards, and conditions established by the EA. All other aspects of the disposal site shall be kept in a state of reasonable repair.

Preventative maintenance needs will be identified through a semiannual inspection of the parking lot and surroundings areas within the Site. A visual inspection will be conducted to identify

evidence of differential settlement. Further inspection will include an examination of the asphalt cover, catch basins, surface drainage, vegetative cover, monitoring wells, light standards, and security features.

6.1.3.1 Maintenance of Asphalt Cover

Visual inspections of asphalt cover shall, at minimum, look for evidence of:

- Differential settlement, such as ponding or “sagging” of pavement.
- Cracking of pavement and/or other signs of deterioration.

If damaged or failing pavement that might result in water infiltration to the subsurface is noted, then repairs will be made as follows:

- If differential settlement occurs and sagging of pavement is observed, an asphalt overlay may be required to maintain proper surface drainage. When necessary, import of additional soil may be used to raise the damaged area to the appropriate sub-grade and a fabric interlay may be coupled with the asphalt pavement to increase the tensile strength of the section and avoid future sagging.
- An asphalt-based seal coat shall be used to seal minor cracking of the pavement. Areas with excessive cracking may be saw-cut and the pavement section replaced.
- An asphalt-based seal coat may also be used in areas in which the pavement has deteriorated and surface aggregate has loosened.

6.1.3.2 Maintenance of Unpaved Areas

Visual inspection of grounds will be conducted to locate evidence of differential settlement. Repair of differential settlement in unpaved areas shall be conducted by importing soil and re-grading surfaces if ponding occurs.

6.1.3.3 Maintenance of Storm Drainage and Erosion Control

The parking lot surfaces, drainage channels, and catch basins will be inspected for evidence of accumulated trash, debris, and sediment. These areas will be swept and cleaned on a routine basis. Unpaved areas will be inspected for erosion and settlement due to wind and rain. To repair erosion damage, the Site will be re-graded and best management practices (BMPs) will be implemented as needed. Vegetative cover within the Habitat Buffer zone will also be visually inspected for erosion control and slope protection. Slopes, eroded surfaces, and areas of sparse or dead vegetation will be repaired by replanting and reseeding as required with appropriate plant species.

6.1.3.4 Maintenance of Landscaping

All of the landscaping located in the parking lot will be placed in planters and will not penetrate the cap.

If the landscaping is changed, it will include only low water usage plants. Irrigation will be monitored and the irrigation systems maintained by trained maintenance staff. The irrigation systems will be inspected, while in operation, and the following measures will be taken:

- All sprinkler heads will be adjusted and repaired as necessary.
- Any valves which are stuck open will be fixed, and any line breaks will also be fixed.
- Rain guards, moisture sensors, and flow sensors will also be inspected and adjusted as necessary.

No deep-rooted plants will ever be used in the landscaping, in order to protect the integrity of the landfill cap.

6.1.4 Leachate Control (27 CCR §20790)

The operator shall ensure that leachate is controlled to prevent contact with the public.

Leachate has not been reported or observed at the Site. If any sign of leachate is discovered at the surface, the incident will be addressed using procedures found in the Emergency Response Plan, Section 6.3.7 (Waste Releases).

6.1.5 Drainage/Erosion Control (27 CCR §20820)

(a) The drainage system shall be designed and maintained to:

(1) ensure integrity of roads, structures, and gas monitoring and control systems;

(2) prevent safety hazards; and

(3) prevent exposure of waste.

The drainage system is designed to prevent run-on and runoff from adversely affecting the integrity of the final cover and to protect Paradise Marsh or other delineated wetlands from the Site's storm water discharges or landscape runoff. The inspection and maintenance of drainage and erosion control features will follow City of National City storm water requirements and provisions described in Section 6.1.3.3 (Maintenance of Storm Drainage and Erosion Control), which will be conducted before the rainy season and after heavy rainfall events.

6.1.6 Litter Control (27 CCR §20830)

Litter shall be controlled, routinely collected and disposed of properly. Windblown materials shall be controlled to prevent injury to the public and personnel. Controls shall prevent the accumulation, or off-site migration, of litter in quantities that create a nuisance or cause other problems.

Visual inspections will be conducted for the presence of accumulated trash, debris, and cast-off materials. The parking lots and other public areas will be swept and/or cleared of trash and debris and trash receptacles will be provided in these areas as standard storm water BMPs. These BMPs are included in Appendix B. The barrier along the pedestrian walkway will also be inspected for windblown litter and appropriate measures taken, when necessary, to remove accumulated trash.

6.1.7 Gas Control (27 CCR §20919)

Where the enforcement agency, the local fire control authority, or the CIWMB has cause to believe a hazard or nuisance may be created by landfill decomposition gases, they shall so notify the owner. Thereafter, the site owner shall cause the site to be monitored for presence and movement of gases, and shall take necessary action to control such gases. The site owner shall inform the operator of any actions ordered by the EA, the local fire control authority or the CIWMB concerning gas control methods. The monitoring program shall be developed pursuant to the specifications of the above agencies. The monitoring program shall not be discontinued until authorized to do so in writing by the requiring agency. Results of the monitoring shall be submitted to the appropriate agencies. If monitoring indicates methane gas movement away from the site, the owner shall, within a period of time specified by the requiring agency, construct a gas control system approved by that agency. The agency may waive this requirement if satisfactory evidence is presented indicating that adjacent properties are safe from hazard or nuisance caused by methane gas movement. The operator shall duly inform the disposal site owner of possible landfill gas problems.

Based on the soil gas sampling results discussed in the Property Closure Report, no methane concentrations above laboratory levels were reported in most sampling locations, and detectable methane concentrations are reported to be well below the County of San Diego action level of 12,500 milligrams per liter as vapor (mg/L-v); therefore, no ongoing monitoring for methane gas has been required in this PCMMP.

6.1.8 Postclosure Land Use (27 CCR §21190(c))

All proposed postclosure land uses, other than non-irrigated open space, on sites implementing closure or on closed sites shall be submitted to the EA, RWQCB, local air district and local land use agency. The EA shall review and approve proposed postclosure land uses if the project involves structures within 1,000 feet of the disposal area, structures on top of waste, modification of the low permeability layer, or irrigation over waste.

Commercial and industrial uses are planned for Marina Gateway, including a hotel and restaurant. The land uses at Marina Gateway may expand or change over time and will follow the standard City of National City permitting process; however, no further

development or improvements of any kind are allowed on the Site (depicted in Figure 3-2) without prior approval of the DEH.

6.2 Site Monitoring and Inspection Program

In addition to the routine inspections conducted by the County LEA for regulatory compliance, the property owner or their representative will be performing at least semi-annual self-audits to assess Site maintenance and any needs for corrective actions.

7.1 Introduction

The purpose of the ERP is to outline the procedures to be followed in the event an emergency action is required during the post-closure maintenance period. The ERP identifies those occurrences that may cause disruption of the landfill cap and endanger public health and safety and the environment.

The primary elements of the ERP include:

- Chain of command and notification procedures for emergency responses.
- Procedures and practices to follow during emergency response actions.
- Reporting requirements for the emergency response actions.

This plan will be available for viewing at the following location:

Community Development Commission of National City
1243 National City Boulevard
National City, CA 91950

7.1.1 Regulatory Requirements

The requirements for a post-closure ERP are found in 27 CCR §21130, which states:

(a) The operator shall maintain a written postclosure emergency response plan at the facility or at an alternate location as approved by the enforcement agency (EA). The emergency response plan must identify occurrences that may exceed the design of the site and endanger public health or the environment. The plan shall describe specific procedures that minimize these hazards to protect public health and safety. The events that the plan shall address include, but are not limited to: vandalism, fires, explosions, earthquakes, floods, the collapse or failure of artificial or natural dikes, levees or dams; surface drainage problems; and other waste releases.

(b) The emergency response plan shall contain the following:

(1) identification of events which could require the implementation of emergency response actions. This section shall not apply to the gas monitoring provisions;

(2) a description of the actions to be taken, and the sequence and implementation timetable needed to mitigate the conditions; and

(3) a statement regarding the general availability of equipment required to mitigate each type of emergency.

(c) The operator shall amend the emergency response plan under the following conditions:

(1) whenever a failure or release occurs for which the plan did not provide an adequate response;

(2) when the postclosure land use and/or structures on the site change and these changes are not addressed in the existing plan; or

(3) if the EA notifies the operator in writing that the current emergency response plan is inadequate under the provisions of this section. The notifying agency shall include within the written notice the items the plan needs to consider for it to comply with this section. The operator

shall submit an amended emergency response plan to the EA within thirty (30) days of notification of an inadequacy.

(d) Whenever the operator amends the emergency response plan pursuant to §(c)(1 or 2), the operator shall submit a written copy of the amended plan to the EA.

7.1.2 Emergency Response Plan Coordinator and Responsibilities

The identification of the occurrence of an emergency, and appropriate emergency response actions must be made by an individual having both the authority and training to oversee implementation of the ERP. This individual is designated as the ERP Coordinator, whose responsibility it is to:

- Oversee and coordinate all emergency response activities.
- Communicate with the appropriate regulatory agencies in the event of an emergency.
- Ensure required documentation is transmitted to appropriate regulatory agencies for their approval and/or records.
- Review and revise the ERP as necessary.

All inspectors, maintenance crews, visitors, and other personnel who potentially may be exposed to burn ash/waste materials at the Site are subject to the provisions of this ERP and they should be familiar with its provisions. This is not a Worker Health and Safety Plan and therefore the employer of personnel entering the Site will be responsible for the health and safety of their own employees. All contractors must comply with applicable Occupational Safety and Health Administration standards.

In the event of an injury or illness requiring emergency medical care, the following resources can be used:

- Paradise Valley Hospital (619) 470-4321
2400 East Fourth Street, National City, CA 91950 (See Figure 7-1 Location Map)
- Fire Rescue (Paramedics) 911.

7.1.3 Emergency Response Plan Revisions

As specified in the regulations, the ERP will be amended or revised whenever there is:

- A failure or release that was not adequately addressed in the plan with an appropriate response.
- Any change in post-closure land use at the Site.

- Any changes in maintenance, monitoring, or inspections requirements during the post-closure maintenance period.

7.1.4 Equipment

The ERP Coordinator will make arrangements for equipment required for emergency repairs. Generally this equipment is limited to dozers, scrapers, and graders for grading, excavation, and/or compaction activities. Additionally, a water truck may be required for dust suppression.

7.2 Employee Training

Emergency personnel shall have completed the 40-hour safety training requirements in accordance with Title 29 of Code of Federal Regulations (CFR) Section 1910.120, Hazardous Waste Operations and Emergency Response (HAZWOPER).

When appropriate (e.g, a slope failure has occurred at the Site and is being repaired), daily safety briefings will be held prior to work activities and all on-site personnel shall be required to attend. Topics of discussion and attendance will be documented.

7.3 Potential Hazards and Corrective Actions

7.3.1 Vandalism

Vandalism is the willful or malicious destruction or defacement of Site property such as perimeter fencing, monitoring wells, landscape vegetation, drainage structures, or final cover. The ERP Coordinator will inspect and evaluate the damage and loss due to vandalism. If affected areas pose a potential health and/or safety hazard, they will be cordoned off to limit access and corrective action will be taken as soon as practicable.

Non-critical repairs (i.e., fencing or landscaping) will be scheduled at that same time and initiated within seven (7) days. Acts of vandalism will be reported to the local police first and then to the LEA.

7.3.2 Fires and Explosions

Fire or explosion may be caused by ignition of brush, on-site structures or, in extreme cases, by landfill gas (LFG) accumulation in excess of the lower explosive limit (LEL) (highly unlikely scenario). On-site personnel will not be directly involved in fire-fighting activities, but will respond as follows:

- Any occurrence of fire or explosion will be immediately reported to the local fire department (*Call 911*) and to the ERP Coordinator.

- Affected area will be cordoned off by at least 250 feet from the incident.
- If appropriate, hand-operated fire extinguishers will be used by trained personnel for small grass fires.
- The ERP Coordinator will immediately notify the LEA.

Once the fire has been extinguished, an investigation will be conducted as to cause, an evaluation of damage will be assessed, and appropriate corrective actions taken. A follow-up report will be issued to the LEA within seven (7) days of the incident that documents the cause of fire or explosion, corrective actions taken, and future preventative maintenance measures proposed.

7.3.3 Earthquakes

Earthquakes can cause slope failures and damage to final cover (including paved surfaces), on-site facilities, environmental monitoring systems, and drainage structures. Following a significant earthquake (a “significant earthquake” is defined as having a magnitude greater than 5.0 for the purposes of this PCMMP), the Site will be assessed for damages and the LEA notified within 24 hours. The ERP Coordinator will make all necessary arrangements for repairs to final cover, drainage, and/or monitoring systems if earthquake damage is noted. A written report that documents earthquake damages and recommended repairs will be submitted within seven days to the LEA.

7.3.4 Floods

Flooding resulting from extreme weather conditions has the potential for significant damage to final cover and drainage systems. In the event of a flood, the following actions will be taken:

- Following the flood event, the ERP Coordinator will assess the Site for damages.
- If necessary, temporary diversion channels will be constructed to minimize water infiltration into waste disposal areas; sandbags may be used in conjunction with temporary drainage channels for this purpose.
- The ERP Coordinator will determine whether significant damage has occurred to the final cover system to warrant immediate repairs; if so, arrangements will be made for immediate corrective actions.
- The ERP Coordinator will notify the LEA within 24 hours as to any flood-related impacts and a written report will be issued within seven days to both the LEA that documents flood damage and recommended repairs.

7.3.5 Failure of Dikes or Levees

The same procedures will be followed as discussed under Section 6.3.4 (Flood).

7.3.6 Surface Drainage Problems

The same procedures will be followed as discussed under Section 6.3.4 (Flood).

7.3.7 Waste Releases

If buried wastes are released through the disruption of engineered cap as a result of hazards described above or any other unforeseen event, the following actions will be taken:

- Affected areas will be immediately cordoned off to prevent public access.
- ERP Coordinator will assess the situation and the wastes will be properly characterized to determine whether the wastes released are non-hazardous or hazardous in nature.
- All necessary measures will be taken immediately to prevent further waste releases; any required waste containment and disposal equipment will be mobilized immediately or rented if necessary.
- Non-hazardous waste will be cleaned up and removed for disposal to an approved solid waste facility.
- If the waste is suspected to be hazardous in nature, a licensed hazardous waste contractor will be hired to contain and properly dispose of waste.
- The ERP Coordinator will report any waste releases to the LEA within 24 hours and a written report will be issued within seven days that documents the release circumstances, final disposition of wastes, and recommended further preventative measures, if any.

California Integrated Waste Management Board. August 2004. *Final Remediation Work Plan, National City Dump, City of National City, San Diego County*

_____. June 2003. *Site Sampling Report, National City Dump, City of National City, San Diego County*

SCS Engineers (formerly Environmental Business Solutions). March 25, 2003. *Property Mitigation Plan for the Cleveland Associates, Inc Property APNs 559-117-14 and -15; and 559-160-03,-09, and -21 and the Former Cuyamaca Meats, Inc. Property APN 559-160-11*

_____. June 26, 2002. *Feasibility Study: Preliminary Geotechnical Evaluation, Ecological Scoping Study, and Supporting Site Assessment Activities for the Harbor District Redevelopment Project, National City, California*

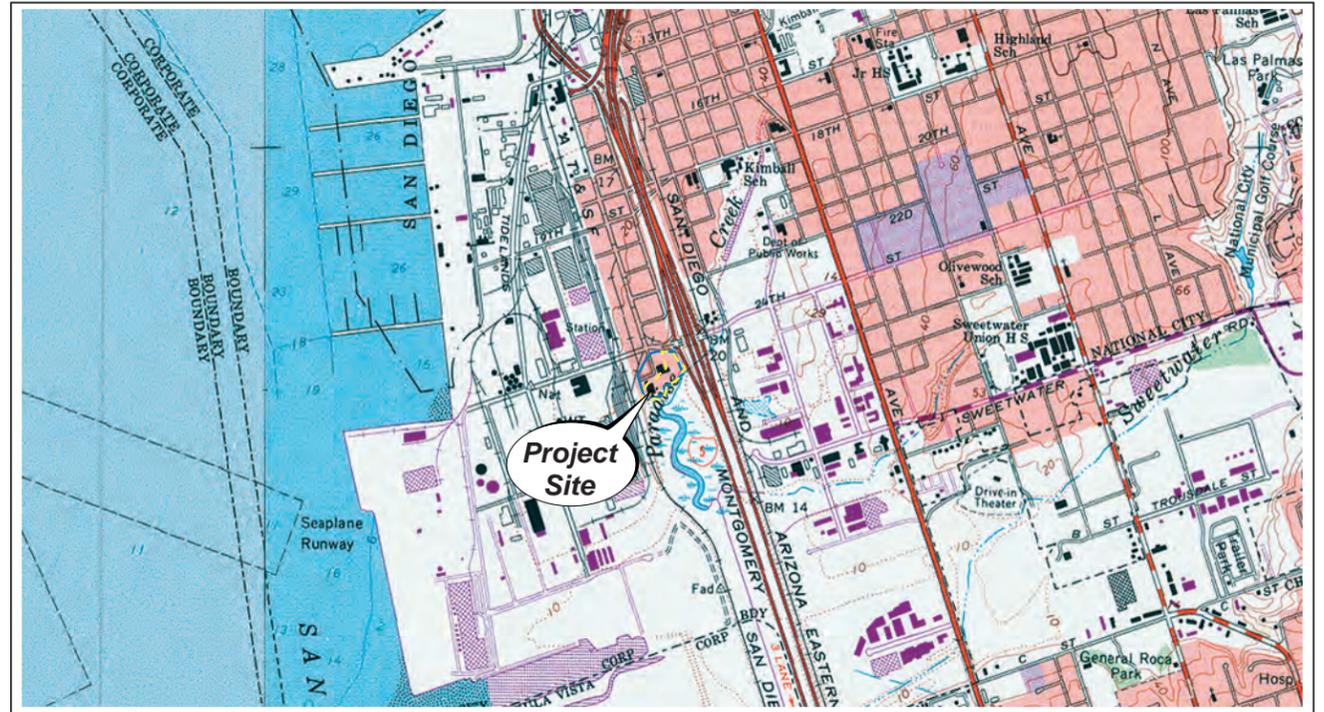
_____. September 4, 2001. *Master Workplan, CDC Harbor District Redevelopment Project, Environmental Remediation*

_____. November 5, 1998. *City of National City Local Coastal Program Harbor District Specific Area Plan*

FIGURES



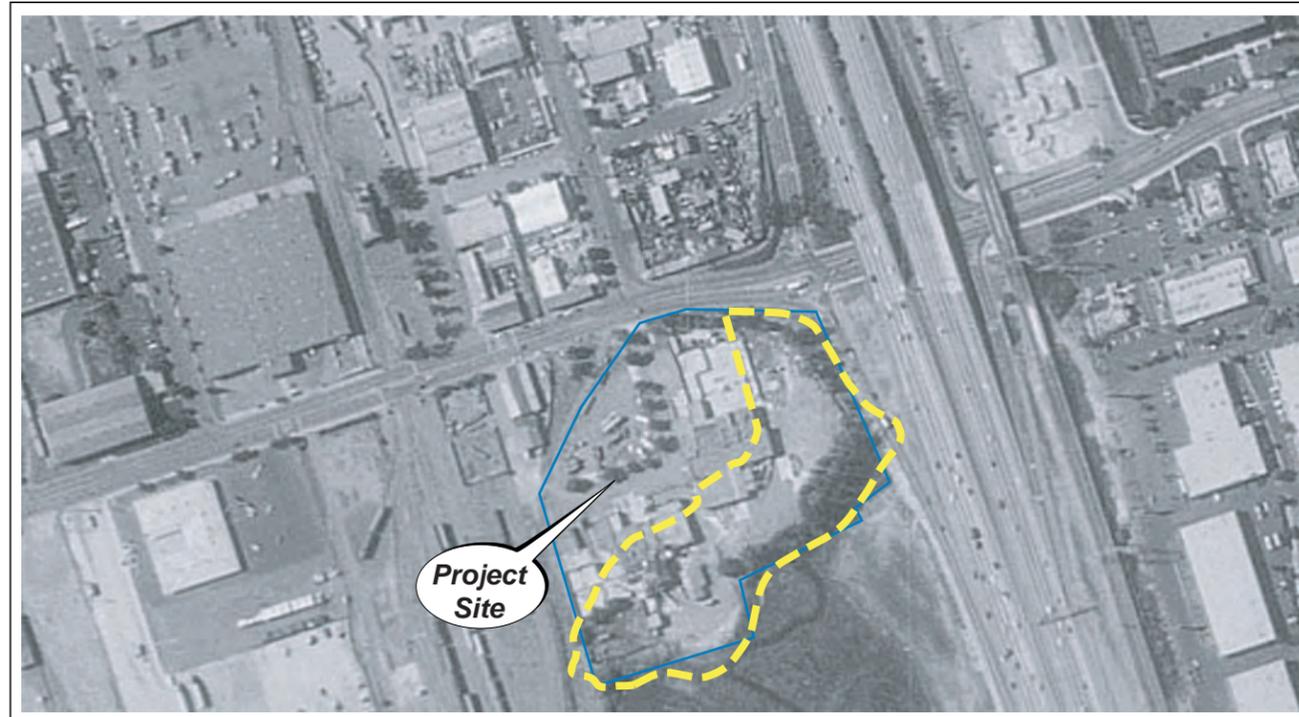
REGIONAL SITE LOCATION



2-DIMENSIONAL SITE LOCATION

Reference:
U.S.G.S. 7.5 Minute Quadrangle map
National City, California - 1977. Photo revised 1982.

0 1000 2000 3000
Approximate Graphic Scale in Feet



SITE AERIAL PHOTOGRAPH

Reference:
Terra Server Aerial Photograph
National City, California - May 1994

0 660 1320 1980
Approximate Graphic Scale in Feet



3-DIMENSIONAL SITE LOCATION

Reference:
U.S.G.S. 7.5 Minute Quadrangle map
National City, California - 1977. Photo revised 1982.

North
(Not to scale)



Marina Gateway Project Area



Site

Disclaimer: This figure is based on available data. Actual conditions may differ. All locations and dimensions are approximate.

SCS ENGINEERS

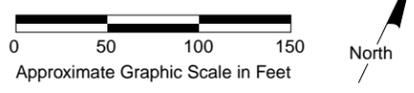
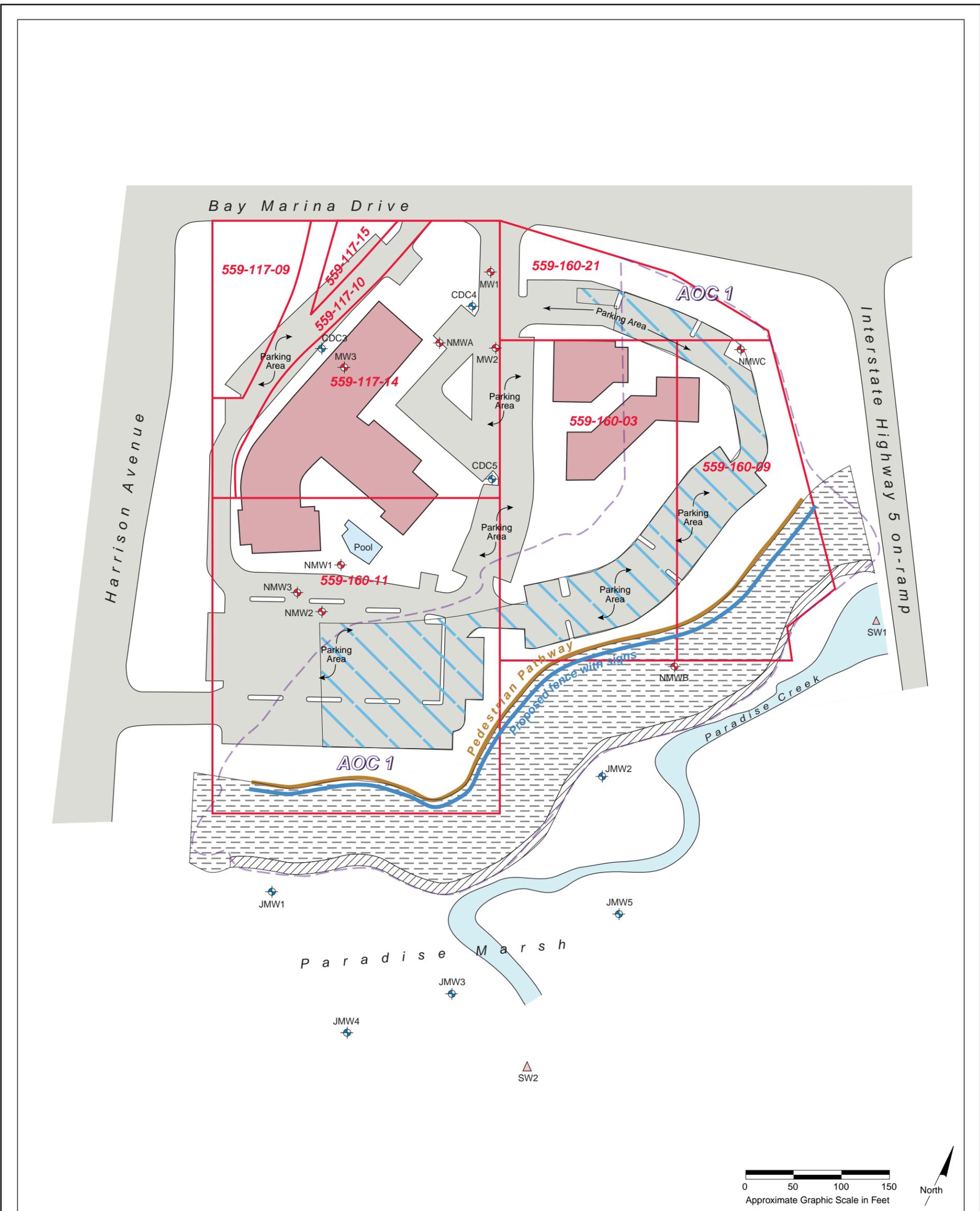
Environmental Consultants
8799 Balboa Avenue, Suite 290
San Diego, California 92123

4-WAY SITE LOCATION MAP
Community Development Commission of National City
Marina Gateway Project
2501 and 2510 Cleveland Avenue
National City, California

Project No.:
01203569.05

Figure 3-1

Date Drafted:
10/18/06



EXPLANATION

-  Monitoring well location.
-  Approximate parcel boundaries.
-  Proposed buildings.
-  Proposed monitoring well location.
-  Former monitoring well location.
-  Well designation and groundwater elevation as measured on 6/27/06.
-  Approximate boundary of Site (mitigated former burn dump with engineered cap/covenant area)
-  Portion of parking lot installed by CIWMB.
-  Upper zone planting.
-  Transition zone planting.

Disclaimer: This figure is based on available data. Actual conditions may differ. All locations and dimensions are approximate.

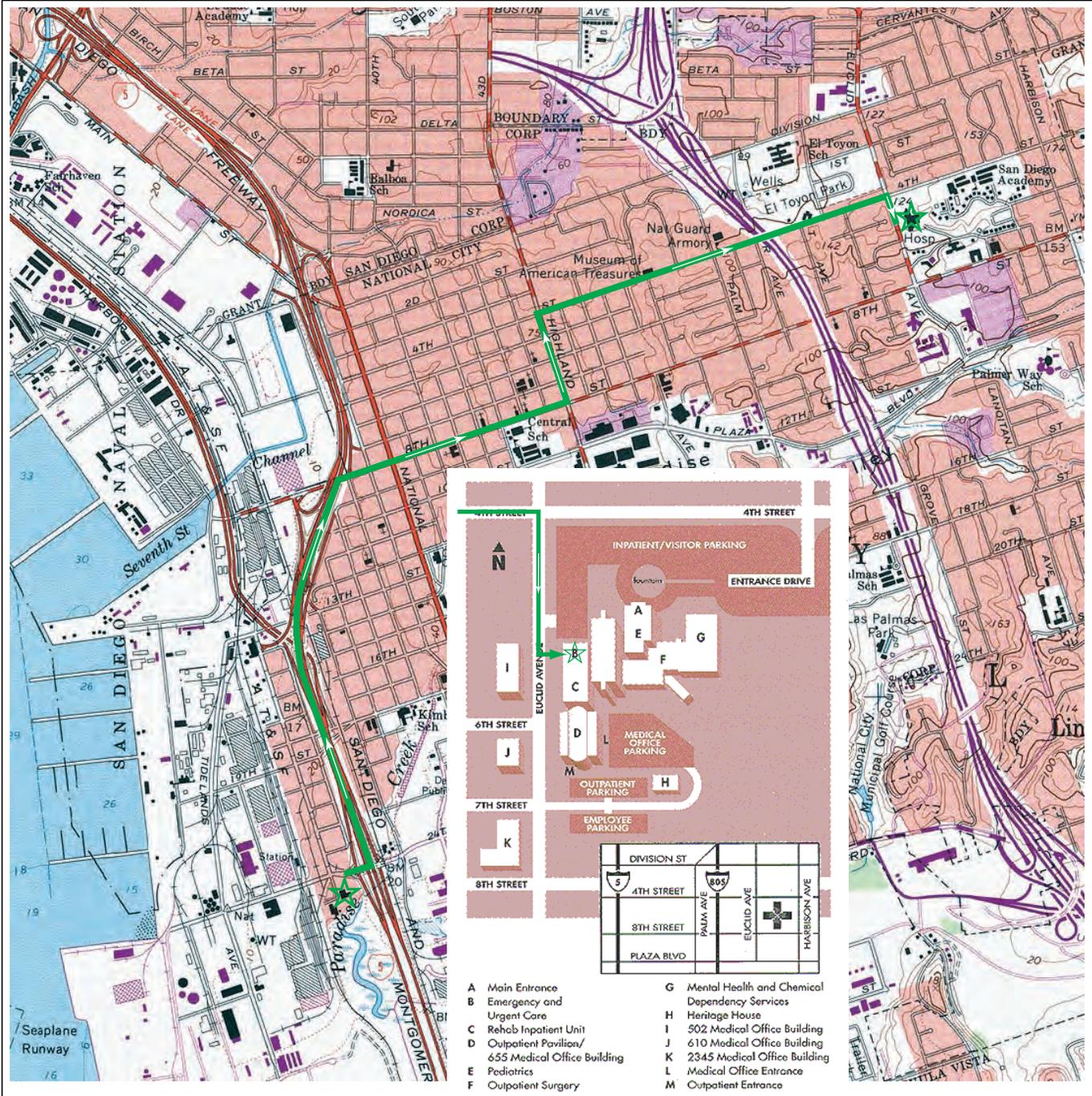
SCS ENGINEERS
 Environmental Consultants
 8799 Balboa Avenue, Suite 290
 San Diego, California 92123

LAND USE MAP
 Community Development Commission of National City
 Marina Gateway Hotel Project
 Formerly Cleveland and Cuyamaca Properties
 2501 and 2510 Cleveland Avenue
 National City, California

Project No.:
01203569.11

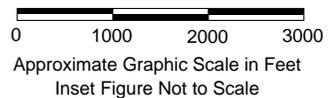
Figure 3-2

Date Drafted:
10/19/06



Reference:
 U.S.G.S. 7.5 Minute Quadrangle map
 National City, California - 1977. Photo revised 1982.

 Route to hospital



f:/macfiles/macprojects/203/203569/figs/203569.05/PCMMP/fig 7-1.ai
 Disclaimer: This figure is based on available data. Actual conditions may differ. All locations and dimensions are approximate.

SCS ENGINEERS

Environmental Consultants
 8799 Balboa Avenue, Suite 290
 San Diego, California 92123

HOSPITAL LOCATION MAP
 Community Development Commission of National City
Marina Gateway Project
 2501 and 2510 Cleveland Avenue
 National City, California

Project No.:
 01203569.05

Figure 7-1

Date Drafted:
 12/14/04

**APPENDIX A
DEED RESTRICTION**

RECORDING REQUESTED BY:

Community Development Commission
City of National City
140 E. 12th Avenue
National City, California 91950
Attn: Redevelopment Director

WHEN RECORDED, MAIL TO:

Dept. of Environmental Health
County of San Diego
1255 Imperial Ave, 3rd Floor
San Diego, California 92101
Attn: Donn LiPera
Site Assessment & Mitigation Division

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

COVENANT TO RESTRICT USE OF PROPERTY

(Health and Safety Code section 25355.5)

ENVIRONMENTAL RESTRICTION

(Civil Code section 1471)

For Property at:

2501 and 2510 Cleveland Ave.
National City, California

San Diego County Assessor's Parcel Nos.: 559-160-03, -09, -11, and -21

This Covenant and Agreement ("Covenant") is made effective as of _____, 2006 by and between the Community Development Commission of the City of National City, a body corporate and politic (the "Covenantor"), the current owner of property situated in National City, County of San Diego, State of California, described in Exhibit "A", and depicted in Exhibit "B", attached hereto and incorporated herein by this reference (the "Property"), and the Department of Environmental Health, County of San Diego (the "Department") which has been appointed as the "administering agency" for the mitigation of environmental conditions at the Property pursuant to Health and Safety Code sections 25260, et seq. (the "Unified Agency Review of Hazardous Sites Law"). Pursuant to Civil Code section 1471 (c) the Department has determined that this Covenant is reasonably necessary to protect present or future human health or safety or the environment as a result of the presence on the land of hazardous materials as defined in Health and Safety Code ("H&SC") section 25260. The Covenantor and the Department, collectively referred to as the "Parties", hereby agree that pursuant to Civil Code section 1471 and H&SC sections 25355.5 and 25222.1 that the use of the Property be restricted as set forth in this Covenant and that this Covenant shall run with the land.

ARTICLE I
STATEMENT OF FACTS

1.01 The Property is more particularly described and depicted in Exhibit “A”, attached hereto and incorporated herein by this reference. The Property is located in the area now generally bounded by Paradise Marsh to the south, Bay Marina Drive to the north, the I-5 Freeway to the east, and Marina Way to the west, City of National City, County of San Diego, State of California. This property is more specifically described as San Diego County Assessor’s Parcel Nos.: 559-160-03, -09, -11, and -21.

1.02 The Property Mitigation Plan (PMP) prepared and approved under the oversight of the Department, provides that a deed restriction be required as a result of the “capping in place” of materials on a portion of the Property which required remediation. The location and extent of the “capped” area of the Property below which hazardous materials are located is indicated in Exhibit “B”. The PMP identifies burn ash constituents, including lead, arsenic, chromium, copper, mercury, zinc, polychlorinated biphenyls, and naphthalene, which are hazardous substances as defined in H&SC Section 25316, which are hazardous materials as defined in H&SC Section 25260, and which will remain at elevated levels in the fill materials to depths of approximately 24 to 26 feet below grade of the ground surface (bgs) of portions of the Property below the “cap” and the pavement above it. The Department approved the PMP on April 16, 2003, which requires the recording of this Deed Restriction on the Property with the County of San Diego, as detailed in the Final PMP prepared by Environmental Business Solutions, Inc., a division of SCS Engineers, as approved by the Department. As a result of the assessments and mitigation activities that have been conducted to date, the previously referended hazardous materials and hazardous substances, as defined in H&SC sections 25316, are found onsite. These hazardous materials/substances are located at the Property as follows:

At depths of 0 to 2 feet bgs; Asphaltic pavement and clean imported fill soil.

At depths of 02 to 26 feet bgs; Burn ash mixed with soil.

These contaminants may pose a threat to human health if the cap is damaged or penetrated. Based on the Final PMP the Department concluded that use of the Property does not present an unacceptable threat to human safety or the environment if the integrity of the cap that has been placed over the hazardous materials is maintained.

ARTICLE II
DEFINITIONS

2.01 Department. “Department” means the Department of Environmental Health for the County of San Diego and includes its successor agencies, if any.

2.02 Owner. “Owner” means the Covenantor, its successors in interest, and their successors in interest, including heirs and assigns, who at any time hold title to all or any portion of the Property.

2.03 Occupant. “Occupant” means Owners and any person or entity entitled by ownership, leasehold, or other legal relationship to the right to occupy any portion of the Property.

ARTICLE III
GENERAL PROVISIONS

3.01 Restrictions to Run with the Land. This Covenant sets forth protective provisions, covenants, restrictions, and conditions (collectively referred to as “Restrictions”), subject to which the Property and every portion thereof shall be improved, held, used, occupied, leased, sold, hypothecated, encumbered, and/or conveyed. Each and every Restriction: (a) runs with the land pursuant to H&SC Sections 25355.5 and Civil Code Section 1471; (b) inures to the benefit of and passes with each and every portion of the Property; (c) is for the benefit of, and is enforceable by the Department; and (d) is imposed only upon the that portion of the Property depicted in the attached Exhibit “B”.

3.02 Binding upon Owners/Occupants. Pursuant to H&SC Section 25355.5(a)(1)(C), this Covenant binds all owners of the Property, their heirs, successors, and assignees, and the agents, employees, and lessees of the owners, heirs, successors, and assignees. Pursuant to Civil Code Section 1471(b), all successive owners of the Property are expressly bound hereby for the benefit of the Department.

3.03 Written Notice of the Presence of Hazardous Substances. Prior to the sale, lease or sublease of the Property, or any portion thereof, the owner, lessor, or sublessor shall give the buyer, lessee, or sublessee notice that hazardous substances are located on or beneath the Property, as required by H&SC Section 25359.7.

3.04 Incorporation into Deeds, Leases and Subleases. From and after the date of recordation of this Covenant, the Restrictions set forth herein shall be incorporated by reference in each and all deeds and leases for any portion of the Property. Further, each Owner or Occupant shall include in any instrument conveying any interest in all or any portion of the Property, including but not limited to deeds, leases, and mortgages, a notice which is in substantially the following form:

NOTICE: THE INTEREST CONVEYED HEREBY IS SUBJECT TO AN ENVIRONMENTAL RESTRICTION AND COVENANT TO RESTRICT USE OF PROPERTY ABOVE THE CAPPED AREA, RECORDED IN THE OFFICIAL RECORDS OF THE OFFICE OF THE SAN DIEGO COUNTY RECORDER ON [DATE], FILE NO. _____, IN FAVOR OF AND ENFORCEABLE BY THE DEPARTMENT OF ENVIRONMENTAL HEALTH, COUNTY OF SAN DIEGO.

3.05 Conveyance of Property. The Owner shall provide notice to the Department not later than thirty (30) days after any conveyance of any ownership interest in the Property (excluding mortgages, liens, and other non-possessory encumbrances). The Department shall not, by reason of this Covenant, have authority to approve, disapprove, or otherwise affect proposed

conveyance, except as otherwise provided by law, by administrative order, or by a specific provision of this Covenant.

ARTICLE IV RESTRICTIONS

4.01 Prohibited Uses. The portions of the Property described in Exhibit B overlying the capped materials shall not be used for any of the following purposes:

- (a) A residence, including any mobile home or factory built housing, constructed or installed for use as residential human habitation.
- (b) A hospital for humans.
- (c) A public or private school for persons under 21 years of age.
- (d) A day care center for children.

4.02 Soil Management

(a) No activities that will disturb the soil (e.g., excavation, grading, removal, trenching, filling, earth movement or mining) shall be allowed on that portion of the Property above the capped area indicated in Exhibit "B" without an appropriate Soil Management Plan and a Health and Safety Plan approved by the Department.

(b) Any contaminated soils brought to the surface by grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law.

(c) The Owner shall provide the Department written notice at least fourteen (14) days prior to any building, filling, grading, mining or excavating in the Property soils.

4.03 Access for Department. The Department and its designees shall have reasonable right of entry and access to the Property for inspection, monitoring, and other activities consistent with the purposes of this Covenant as deemed necessary by the Department in order to protect the public health or safety, or the environment.

ARTICLE V ENFORCEMENT

5.01 Enforcement. Failure of the Covenantor, Owner or Occupant to comply with any of the Restrictions specifically applicable to it shall be grounds for the Department to require that the Covenantor or Owner, as applicable, modify or remove any improvements ("Improvements" herein shall mean all buildings or other improvements placed thereon) constructed or placed upon any portion of the Property in violation of the Restrictions.

ARTICLE VI VARIANCE, TERMINATION, AND TERM

6.01 Variance. Covenantor, or any other aggrieved person, may apply to the Department for a written variance from the provisions of this Covenant. Such application shall be made in accordance with H&SC Section 25233 as implemented by the Department pursuant to H&SC Section 25264.

6.02 Termination. Covenantor, or any other aggrieved person, may apply to the Department for a termination of the Restrictions or other terms of this Covenant as they apply to all or any portion of the Property. Such application shall be made in accordance with H&SC Section 25234, as implemented by the Department pursuant to H&SC Section 25264.

6.03 Term. Unless ended in accordance with the Termination paragraph above, by law, or by the Department in the exercise of its discretion, this Covenant shall continue in effect in perpetuity.

ARTICLE VII
MISCELLANEOUS

7.01 No Dedication Intended. Nothing set forth in this Covenant shall be construed to be a gift or dedication, or offer of a gift or dedication, of the Property, or any portion thereof to the general public or anyone else for any purpose whatsoever. Further, nothing set forth in this Covenant shall be construed to effect a taking under federal or state law.

7.02 Department References. All references to the Department include successor agencies/departments or other successor entity.

7.03 Recordation. The Covenantor shall record this Covenant, with all referenced Exhibits, with the County Recorder's Office for the County of San Diego within ten (10) days of the Covenantor's receipt of a fully executed original.

7.04 Notices. Whenever any person gives or serves any Notice ("Notice" as used herein includes any demand or other communication with respect to this Covenant), each such Notice shall be in writing and shall be deemed effective: (1) when delivered, if personally delivered to the person being served or to an officer of a corporate party being served, or (2) three (3) business days after deposit in the mail, if mailed by United States mail, postage paid, certified, return receipt requested:

To Owner: Community Development Commission of National City
 1243 National City Blvd.
 National City, CA 91950-3312
 Attn: Redevelopment Director

To Department: Department of Environmental Health
 County of San Diego
 1255 Imperial Avenue
 San Diego, CA 92101
 Attn: Site Assessment and Mitigation Division

Any party may change its address or the individual to whose attention a Notice is to be sent by giving written Notice in compliance with this paragraph. After conveyance of this Property by the Covenantor future Notices shall be the responsibility of the owner of record as identified in the County Recorder's official books.

7.05 Partial Invalidity. If any portion of the Restrictions or other term set forth herein is determined by a court of competent jurisdiction to be invalid for any reason, the surviving portions of this Covenant shall remain in full force and effect as if such portion found invalid had not been included herein.

7.06 Statutory References. All statutory references include successor provisions.

IN WITNESS WHEREOF, the Parties have executed this Covenant to be effective as of the date first written above.

CDC:

**COMMUNITY DEVELOPMENT
COMMISSION OF THE OF THE CITY OF
NATIONAL CITY**, a public body, corporate and
politic

By: _____
Nick Inzunza, Chairman

ATTEST:

_____, CDC Secretary

APPROVED AS TO FORM:

CDC Counsel

**COUNTY OF SAN DIEGO, DEPARTMENT
OF ENVIRONMENTAL HEALTH**

By: _____
Name: _____
Title: _____

EXHIBIT A

Legal Description of the Property

APN 559-160-03

The westerly 125.00 feet (measured at right angles to the westerly line thereof) of Tract "A" of the Chamber of Commerce Industrial Lands No. 1, in the City of National City, County of San Diego, State of California, according to Map thereof No. 1731, filed in the Office of the County Recorder of San Diego County, June 9, 1922.

Together with those portions of 8th Avenue adjoining said Tract "A" on the west, as vacated and closed to public use by Resolution 1064 of the Board of Trustees of the City of National City, said portions being described as follows:

That portion of the easterly 40.00 feet of said 8th Avenue lying southerly of the westerly prolongation of the northerly line of said Tract "A", and northerly of the easterly prolongation of the southerly line of 25th Street, and that portion of the east half of said 8th Avenue lying southerly of the easterly prolongation of 25th Street, and northerly of the westerly prolongation of the southerly line of said Tract "A".

APN 559-160-11

Lots 1 to 10 inclusive, and Lots 13 to 22, inclusive, Block 282 of National City, in the City of National City, in the County of San Diego, State of California, according to Map No. 348, filed in the Office of the County Recorder of San Diego County, October 2, 1882.

Also the westerly 50.00 feet of 8th Avenue adjoining the above block on the east, and the northerly 40.00 feet of 26th Street adjoining on the south together with the alley in said block, as closed by Resolution No. 1064 on July 20, 1926.

Also that portion of the south half of 25th Street adjoining said Block 282 on the north and lying between the northwesterly prolongation of the easterly and westerly lines of said Block 282.

APNs 559-160-09 and -21

All those portions of Tract "A" and "B" of Chamber of Commerce Industrial Lands No. 1, according to Map thereof No. 1731, and Lots 1 through 5, 18, 19, 20, 23, and 24 in Block 232 of National City, according to Map thereof No. 348, said maps being in the City of National City, County of San Diego, State of California, and filed in the Office of the County Recorder of San Diego County, together with that portion of the easterly 40.00 feet of 8th Avenue lying westerly of and adjoining said Lots 1 through 5 of said Map No. 348, lying westerly and southerly of a line described as follows:

Beginning at a point on the south line of said Tract "A", said point being the southeast corner of the land described in the Director's Deed to C&M Meat Packing Corp., a California corporation, recorded February 28, 1968 as file/page no. 34172 of official records, thence along the easterly

line of said land north 27°10'57" west, 34.34 feet; north 30°11'05" east, 66.08 feet; north 31°19'37" west 268.23 feet; north 79°41'54" west, 120.04 feet; and north 88°45'34" west to a point on the westerly line of said Lot 23, said point also being the most southeasterly corner of the land described in the deed to the State of California, recorded December 8, 1961 as file/page no. 212155 of official records; thence along the southerly boundary of said State's land, north 88°45'34" west.

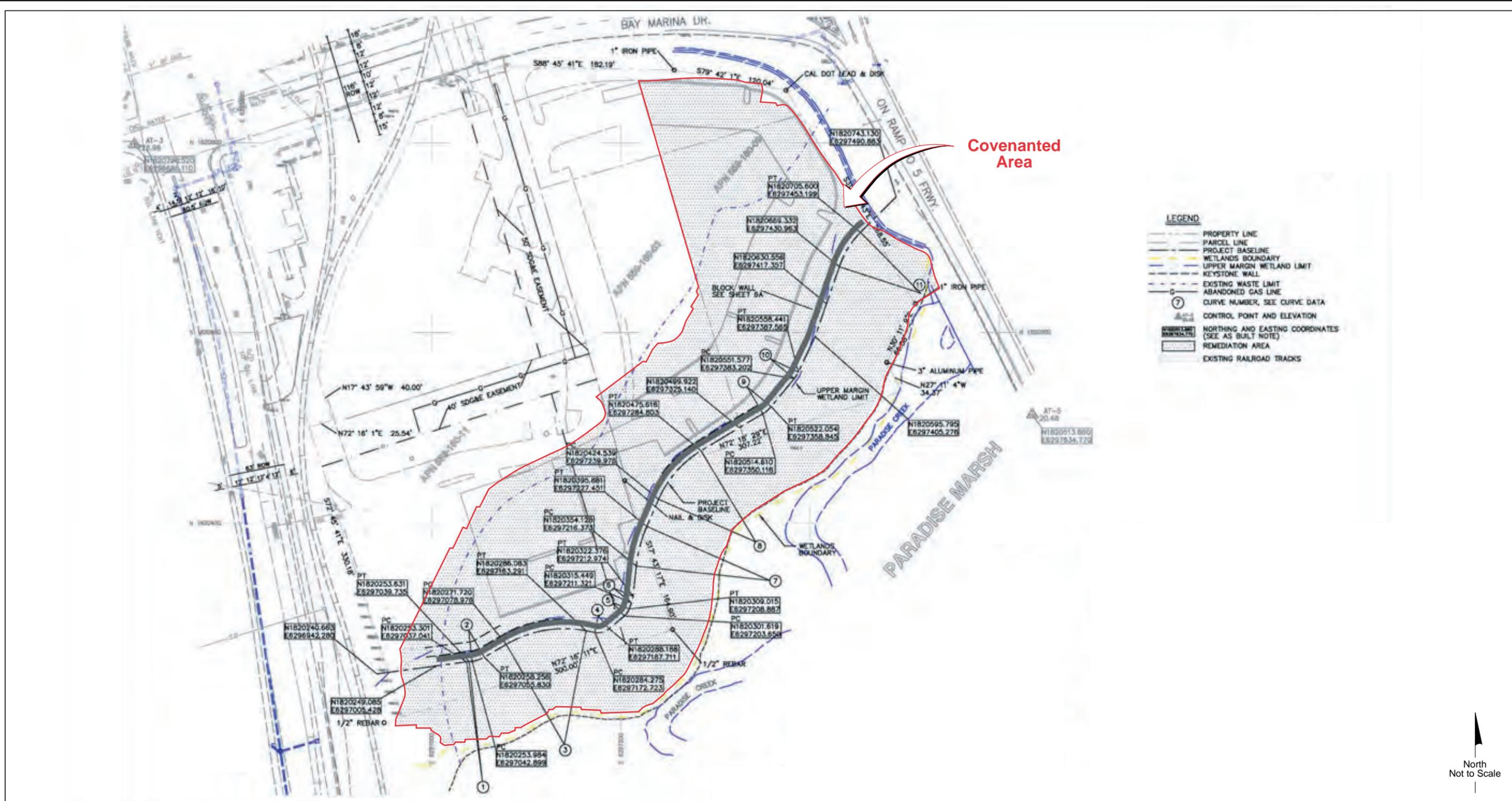
Excepting therefrom the westerly 125.00 feet (measured at right angles to the westerly line thereof) of Tract "A" of the Chamber of Commerce Industrial Lands No. 1, in the City of National City, County of San Diego, State of California, according to Map thereof No. 1731, filed in the Office of the County Recorder of San Diego County, June 9, 1922.

Also excepting therefrom all that portion lying southerly of the northerly line of land conveyed to the United States of America by grant deed recorded August 12, 1988 as File No. 88-399671 of Official Records, said land being shown on Record of Survey Map No. 11749 filed August 10, 1988 as File No. 88-394302 of Official Records.

Also excepting from that portion lying within Lots 18, 19, 20, and 23 in Block 232 the title and exclusive right to all of the minerals and mineral ores of every kind and character now known to exist or hereafter discovered upon, within or underlying said land or that may be produced therefrom, including, without limiting the generality of the foregoing, all petroleum, oil, natural gas, and other hydrocarbon substances and products derived therefrom, together with the exclusive and perpetual right of said grantor, its successors and assigns, of ingress and egress beneath the surface of said land to explore for, extract, mine, and remove the same, and to make such use of the said land beneath the surface as is necessary or useful in connection therewith, which use may include lateral or slant drilling, boring, digging, or sinking, or wells, shafts, or tunnels; provided, however, that said grantor, its successors and assigns, shall not use the surface of said land in the exercise of any said rights, and shall not disturb the surface land or any improvements thereon.

EXHIBIT B

FIGURE DEPICTING LOCATION OF CAPPED PORTIONS OF THE PROPERTY.



LEGEND

	PROPERTY LINE
	PARCEL LINE
	PROJECT BASELINE
	WETLANDS BOUNDARY
	UPPER MARGIN WETLAND LIMIT
	KEYSTONE WALL
	EXISTING WASTE LIMIT
	ABANDONED GAS LINE
	CURVE NUMBER, SEE CURVE DATA
	CONTROL POINT AND ELEVATION
	NORTHING AND EASTING COORDINATES (SEE AS BUILT NOTE)
	REMEDIATION AREA
	EXISTING RAILROAD TRACKS



Disclaimer: This figure is based on available data. Actual conditions may differ. All locations and dimensions are approximate.

<p>SCS ENGINEERS Environmental Consultants 8799 Balboa Avenue, Suite 290 San Diego, California 92123</p>	<p>EXTENT OF COVENANTED AREA Community Development Commission of National City Marina Gateway Hotel Project Formerly Cleveland and Cuyamaca Properties 2501 and 2510 Cleveland Avenue National City, California</p>	<p>Project No.: 01203569.11</p>
	<p>Exhibit B</p>	<p>Date Drafted: 10/31/06</p>

**APPENDIX B
PARKING LOT STORM
WATER BEST MANAGEMENT
PRACTICES**

Parking Lots –Source Control Storm Water BMPs	
<p>PURPOSE:</p> <p>Prevent and reduce the discharge of pollutants from parking areas and include using good housekeeping practices, following appropriate cleaning BMPs, and training employees.</p>	<p>TARGETED ACTIVITIES</p> <ul style="list-style-type: none"> • Vehicle parking • Surface cleaning and maintenance • Litter control
<p>APPROACH TO FUTURE FACILITIES AND UPGRADES:</p> <p><i>Design of New Facilities and Existing Facility Upgrades</i></p> <ul style="list-style-type: none"> • Encourage alternative designs and maintenance strategies for impervious parking lots. <p>APPROACH TO EXISTING FACILITY ACTIVITIES:</p> <ul style="list-style-type: none"> • To ensure storm water pollution prevention practices are considered when conducting activities on or around parking areas to reduce potential for pollutant discharge to receiving waters. <p><i>Operational Considerations</i></p> <p><i>Controlling Litter</i></p> <ul style="list-style-type: none"> • Post “No Littering” signs and enforce anti-litter laws. • Provide and adequate number of litter receptacles. • Clean out and cover litter receptacles frequently to prevent spillage. • Provide trash receptacles in parking lots to discourage litter. • Routinely sweep, shovel, and dispose of litter in the trash. <p><i>Surface Cleaning</i></p> <ul style="list-style-type: none"> • Use dry cleaning methods (e.g. sweeping, vacuuming) to prevent the discharge of pollutants into the storm water conveyance system if possible. • Establish frequency of public parking lot sweeping based on usage and field observations of waste accumulation. • Sweep all parking lots at least once before the onset of the wet season. • Follow the procedures below if water is used to clean surfaces <ul style="list-style-type: none"> ▪ Block the storm drain or contain runoff. ▪ Collect and pump wash water to the sanitary sewer or discharge to a pervious surface. ▪ Do not allow wash water to enter storm drains. ▪ Dispose of parking lot sweeping debris and dirt at a landfill. 	<p>TARGETED POLLUTANTS</p> <ul style="list-style-type: none"> • Trash • Suspended solids • Hydrocarbons • Oil and grease • Heavy Metals <p>KEY APPROACHES</p> <ul style="list-style-type: none"> • Keep the parking areas clean and orderly. • Remove debris in a timely fashion. • Allow sheet runoff to flow into bio-filters (vegetated strip and swale) and/or infiltration devices. • Utilize sand filters or oleophilic collectors for oily waster in low quantities. • Arrange rooftop drains to prevent drainage directly onto paved surfaces. • Design lot to include semi-permeable hardscape.

Parking Lots –Source Control Storm Water BMPs	
<p>APPROACH TO EXISTING FACILITY ACTIVITIES:</p> <p><i>Operational Considerations (continued)</i></p> <ul style="list-style-type: none"> • Follow the procedures below when cleaning heavy oily deposits: <ul style="list-style-type: none"> ▪ Clean oily spots with absorbent materials. ▪ Use a screen or filter fabric over inlet, then wash surfaces. ▪ Do not allow discharges to the storm drain. ▪ Vacuum/pump discharges to a tank or discharge to sanitary sewer. • Appropriately dispose of spilled materials and absorbents. <p><i>Surface Repair</i></p> <ul style="list-style-type: none"> • Preheat, transfer or load hot bituminous material away from storm drain inlet. • Apply concrete, asphalt, and seal coat during dry weather to prevent contamination from contacting storm water runoff. • Cover and seal nearby storm drain inlets where applicable (with waterproof material or mesh) and manholes before applying seal coat, slurry seal, etc. Leave covers in place until job is complete and all water from emulsified oil sealants has drained or evaporated. Clean any debris from these covered manholes and drains for proper disposal. • Use only as much water as necessary for dust control, to avoid runoff. • Catch drips from paving equipment that is not in use with pans or absorbent material placed under the machines. Dispose of collected material and absorbents properly. 	
<p>REQUIREMENTS:</p> <ul style="list-style-type: none"> • Costs associated cleaning and sweeping can be quite large. Construction and maintenance of storm water structural controls can be quite expensive as well. • 	
<p>LIMITATIONS:</p> <ul style="list-style-type: none"> • Limitations related to sweeping activities at large parking facilities may include high equipment costs, the need for sweeper operator training, and the inability of current sweeper technology to remove oil and grease. • 	
<p>RELEVANT RULES AND REGULATIONS</p> <p>40 CFR 117.3 Determination of Reportable Quantities for Hazardous Substance 40 CFR 122-124 NPDES Regulations for Storm water Discharges 40 CFR 401 Effluent Limitation Guidelines</p>	

DEED COVENANT

RECORDING REQUESTED BY:

Community Development Commission
City of National City
140 E. 12th Avenue
National City, California 91950
Attn: Redevelopment Director

WHEN RECORDED, MAIL TO:

Dept. of Environmental Health
County of San Diego
1255 Imperial Ave, 3rd Floor
San Diego, California 92101
Attn: Donn LiPera
Site Assessment & Mitigation Division

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

COVENANT TO RESTRICT USE OF PROPERTY

(Health and Safety Code section 25355.5)

ENVIRONMENTAL RESTRICTION

(Civil Code section 1471)

For Property at:

2501 and 2510 Cleveland Ave.
National City, California

San Diego County Assessor's Parcel Nos.: 559-160-03, -09, -11, and -21

This Covenant and Agreement ("Covenant") is made effective as of _____, 2006 by and between the Community Development Commission of the City of National City, a body corporate and politic (the "Covenantor"), the current owner of property situated in National City, County of San Diego, State of California, described in Exhibit "A", and depicted in Exhibit "B", attached hereto and incorporated herein by this reference (the "Property"), and the Department of Environmental Health, County of San Diego (the "Department") which has been appointed as the "administering agency" for the mitigation of environmental conditions at the Property pursuant to Health and Safety Code sections 25260, et seq. (the "Unified Agency Review of Hazardous Sites Law"). Pursuant to Civil Code section 1471 (c) the Department has determined that this Covenant is reasonably necessary to protect present or future human health or safety or the environment as a result of the presence on the land of hazardous materials as defined in Health and Safety Code ("H&SC") section 25260. The Covenantor and the Department, collectively referred to as the "Parties", hereby agree that pursuant to Civil Code section 1471 and H&SC sections 25355.5 and 25222.1 that the use of the Property be restricted as set forth in this Covenant and that this Covenant shall run with the land.

ARTICLE I
STATEMENT OF FACTS

1.01 The Property is more particularly described and depicted in Exhibit “A”, attached hereto and incorporated herein by this reference. The Property is located in the area now generally bounded by Paradise Marsh to the south, Bay Marina Drive to the north, the I-5 Freeway to the east, and Marina Way to the west, City of National City, County of San Diego, State of California. This property is more specifically described as San Diego County Assessor’s Parcel Nos.: 559-160-03, -09, -11, and -21.

1.02 The Property Mitigation Plan (PMP) prepared and approved under the oversight of the Department, provides that a deed restriction be required as a result of the “capping in place” of materials on a portion of the Property which required remediation. The location and extent of the “capped” area of the Property below which hazardous materials are located is indicated in Exhibit “B”. The PMP identifies burn ash constituents, including lead, arsenic, chromium, copper, mercury, zinc, polychlorinated biphenyls, and naphthalene, which are hazardous substances as defined in H&SC Section 25316, which are hazardous materials as defined in H&SC Section 25260, and which will remain at elevated levels in the fill materials to depths of approximately 24 to 26 feet below grade of the ground surface (bgs) of portions of the Property below the “cap” and the pavement above it. The Department approved the PMP on April 16, 2003, which requires the recording of this Deed Restriction on the Property with the County of San Diego, as detailed in the Final PMP prepared by Environmental Business Solutions, Inc., a division of SCS Engineers, as approved by the Department. As a result of the assessments and mitigation activities that have been conducted to date, the previously referenced hazardous materials and hazardous substances, as defined in H&SC sections 25316, are found onsite. These hazardous materials/substances are located at the Property as follows:

At depths of 0 to 2 feet bgs; Asphaltic pavement and clean imported fill soil.

At depths of 02 to 26 feet bgs; Burn ash mixed with soil.

These contaminants may pose a threat to human health if the cap is damaged or penetrated. Based on the Final PMP the Department concluded that use of the Property does not present an unacceptable threat to human safety or the environment if the integrity of the cap that has been placed over the hazardous materials is maintained.

ARTICLE II
DEFINITIONS

2.01 Department. “Department” means the Department of Environmental Health for the County of San Diego and includes its successor agencies, if any.

2.02 Owner. “Owner” means the Covenantor, its successors in interest, and their successors in interest, including heirs and assigns, who at any time hold title to all or any portion of the Property.

2.03 Occupant. “Occupant” means Owners and any person or entity entitled by ownership, leasehold, or other legal relationship to the right to occupy any portion of the Property.

ARTICLE III
GENERAL PROVISIONS

3.01 Restrictions to Run with the Land. This Covenant sets forth protective provisions, covenants, restrictions, and conditions (collectively referred to as “Restrictions”), subject to which the Property and every portion thereof shall be improved, held, used, occupied, leased, sold, hypothecated, encumbered, and/or conveyed. Each and every Restriction: (a) runs with the land pursuant to H&SC Sections 25355.5 and Civil Code Section 1471; (b) inures to the benefit of and passes with each and every portion of the Property; (c) is for the benefit of, and is enforceable by the Department; and (d) is imposed only upon the that portion of the Property depicted in the attached Exhibit “B”.

3.02 Binding upon Owners/Occupants. Pursuant to H&SC Section 25355.5(a)(1)(C), this Covenant binds all owners of the Property, their heirs, successors, and assignees, and the agents, employees, and lessees of the owners, heirs, successors, and assignees. Pursuant to Civil Code Section 1471(b), all successive owners of the Property are expressly bound hereby for the benefit of the Department.

3.03 Written Notice of the Presence of Hazardous Substances. Prior to the sale, lease or sublease of the Property, or any portion thereof, the owner, lessor, or sublessor shall give the buyer, lessee, or sublessee notice that hazardous substances are located on or beneath the Property, as required by H&SC Section 25359.7.

3.04 Incorporation into Deeds, Leases and Subleases. From and after the date of recordation of this Covenant, the Restrictions set forth herein shall be incorporated by reference in each and all deeds and leases for any portion of the Property. Further, each Owner or Occupant shall include in any instrument conveying any interest in all or any portion of the Property, including but not limited to deeds, leases, and mortgages, a notice which is in substantially the following form:

NOTICE: THE INTEREST CONVEYED HEREBY IS SUBJECT TO AN ENVIRONMENTAL RESTRICTION AND COVENANT TO RESTRICT USE OF PROPERTY ABOVE THE CAPPED AREA, RECORDED IN THE OFFICIAL RECORDS OF THE OFFICE OF THE SAN DIEGO COUNTY RECORDER ON [DATE], FILE NO. _____, IN FAVOR OF AND ENFORCEABLE BY THE DEPARTMENT OF ENVIRONMENTAL HEALTH, COUNTY OF SAN DIEGO.

3.05 Conveyance of Property. The Owner shall provide notice to the Department not later than thirty (30) days after any conveyance of any ownership interest in the Property (excluding mortgages, liens, and other non-possessory encumbrances). The Department shall not, by reason of this Covenant, have authority to approve, disapprove, or otherwise affect proposed

conveyance, except as otherwise provided by law, by administrative order, or by a specific provision of this Covenant.

ARTICLE IV RESTRICTIONS

4.01 Prohibited Uses. The portions of the Property described in Exhibit B overlying the capped materials shall not be used for any of the following purposes:

- (a) A residence, including any mobile home or factory built housing, constructed or installed for use as residential human habitation.
- (b) A hospital for humans.
- (c) A public or private school for persons under 21 years of age.
- (d) A day care center for children.

4.02 Soil Management

(a) No activities that will disturb the soil (e.g., excavation, grading, removal, trenching, filling, earth movement or mining) shall be allowed on that portion of the Property above the capped area indicated in Exhibit "B" without an appropriate Soil Management Plan and a Health and Safety Plan approved by the Department.

(b) Any contaminated soils brought to the surface by grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law.

(c) The Owner shall provide the Department written notice at least fourteen (14) days prior to any building, filling, grading, mining or excavating in the Property soils.

4.03 Access for Department. The Department and its designees shall have reasonable right of entry and access to the Property for inspection, monitoring, and other activities consistent with the purposes of this Covenant as deemed necessary by the Department in order to protect the public health or safety, or the environment.

ARTICLE V ENFORCEMENT

5.01 Enforcement. Failure of the Covenantor, Owner or Occupant to comply with any of the Restrictions specifically applicable to it shall be grounds for the Department to require that the Covenantor or Owner, as applicable, modify or remove any improvements ("Improvements" herein shall mean all buildings or other improvements placed thereon) constructed or placed upon any portion of the Property in violation of the Restrictions.

ARTICLE VI VARIANCE, TERMINATION, AND TERM

6.01 Variance. Covenantor, or any other aggrieved person, may apply to the Department for a written variance from the provisions of this Covenant. Such application shall be made in accordance with H&SC Section 25233 as implemented by the Department pursuant to H&SC Section 25264.

6.02 Termination. Covenantor, or any other aggrieved person, may apply to the Department for a termination of the Restrictions or other terms of this Covenant as they apply to all or any portion of the Property. Such application shall be made in accordance with H&SC Section 25234, as implemented by the Department pursuant to H&SC Section 25264.

6.03 Term. Unless ended in accordance with the Termination paragraph above, by law, or by the Department in the exercise of its discretion, this Covenant shall continue in effect in perpetuity.

ARTICLE VII
MISCELLANEOUS

7.01 No Dedication Intended. Nothing set forth in this Covenant shall be construed to be a gift or dedication, or offer of a gift or dedication, of the Property, or any portion thereof to the general public or anyone else for any purpose whatsoever. Further, nothing set forth in this Covenant shall be construed to effect a taking under federal or state law.

7.02 Department References. All references to the Department include successor agencies/departments or other successor entity.

7.03 Recordation. The Covenantor shall record this Covenant, with all referenced Exhibits, with the County Recorder's Office for the County of San Diego within ten (10) days of the Covenantor's receipt of a fully executed original.

7.04 Notices. Whenever any person gives or serves any Notice ("Notice" as used herein includes any demand or other communication with respect to this Covenant), each such Notice shall be in writing and shall be deemed effective: (1) when delivered, if personally delivered to the person being served or to an officer of a corporate party being served, or (2) three (3) business days after deposit in the mail, if mailed by United States mail, postage paid, certified, return receipt requested:

To Owner: Community Development Commission of National City
1243 National City Blvd.
National City, CA 91950-3312
Attn: Redevelopment Director

To Department: Department of Environmental Health
County of San Diego
1255 Imperial Avenue
San Diego, CA 92101
Attn: Site Assessment and Mitigation Division

Any party may change its address or the individual to whose attention a Notice is to be sent by giving written Notice in compliance with this paragraph. After conveyance of this Property by the Covenantor future Notices shall be the responsibility of the owner of record as identified in the County Recorder's official books.

7.05 Partial Invalidity. If any portion of the Restrictions or other term set forth herein is determined by a court of competent jurisdiction to be invalid for any reason, the surviving portions of this Covenant shall remain in full force and effect as if such portion found invalid had not been included herein.

7.06 Statutory References. All statutory references include successor provisions.

IN WITNESS WHEREOF, the Parties have executed this Covenant to be effective as of the date first written above.

CDC:

**COMMUNITY DEVELOPMENT
COMMISSION OF THE OF THE CITY OF
NATIONAL CITY**, a public body, corporate and
politic

By: _____
Nick Inzunza, Chairman

ATTEST:

_____, CDC Secretary

APPROVED AS TO FORM:

CDC Counsel

**COUNTY OF SAN DIEGO, DEPARTMENT
OF ENVIRONMENTAL HEALTH**

By: _____
Name: _____
Title: _____

EXHIBIT A

Legal Description of the Property

APN 559-160-03

The westerly 125.00 feet (measured at right angles to the westerly line thereof) of Tract "A" of the Chamber of Commerce Industrial Lands No. 1, in the City of National City, County of San Diego, State of California, according to Map thereof No. 1731, filed in the Office of the County Recorder of San Diego County, June 9, 1922.

Together with those portions of 8th Avenue adjoining said Tract "A" on the west, as vacated and closed to public use by Resolution 1064 of the Board of Trustees of the City of National City, said portions being described as follows:

That portion of the easterly 40.00 feet of said 8th Avenue lying southerly of the westerly prolongation of the northerly line of said Tract "A", and northerly of the easterly prolongation of the southerly line of 25th Street, and that portion of the east half of said 8th Avenue lying southerly of the easterly prolongation of 25th Street, and northerly of the westerly prolongation of the southerly line of said Tract "A".

APN 559-160-11

Lots 1 to 10 inclusive, and Lots 13 to 22, inclusive, Block 282 of National City, in the City of National City, in the County of San Diego, State of California, according to Map No. 348, filed in the Office of the County Recorder of San Diego County, October 2, 1882.

Also the westerly 50.00 feet of 8th Avenue adjoining the above block on the east, and the northerly 40.00 feet of 26th Street adjoining on the south together with the alley in said block, as closed by Resolution No. 1064 on July 20, 1926.

Also that portion of the south half of 25th Street adjoining said Block 282 on the north and lying between the northwesterly prolongation of the easterly and westerly lines of said Block 282.

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Beginning at a point on the south line of said Tract "A", said point being the southeast corner of the land described in the Director's Deed to C&M Meat Packing Corp., a California corporation, recorded February 28, 1968 as file/page no. 34172 of official records, thence along the easterly

line of said land north 27°10'57" west, 34.34 feet; north 30°11'05" east, 66.08 feet; north 31°19'37" west 268.23 feet; north 79°41'54" west, 120.04 feet; and north 88°45'34" west to a point on the westerly line of said Lot 23, said point also being the most southeasterly corner of the land described in the deed to the State of California, recorded December 8, 1961 as file/page no. 212155 of official records; thence along the southerly boundary of said State's land, north 88°45'34" west.

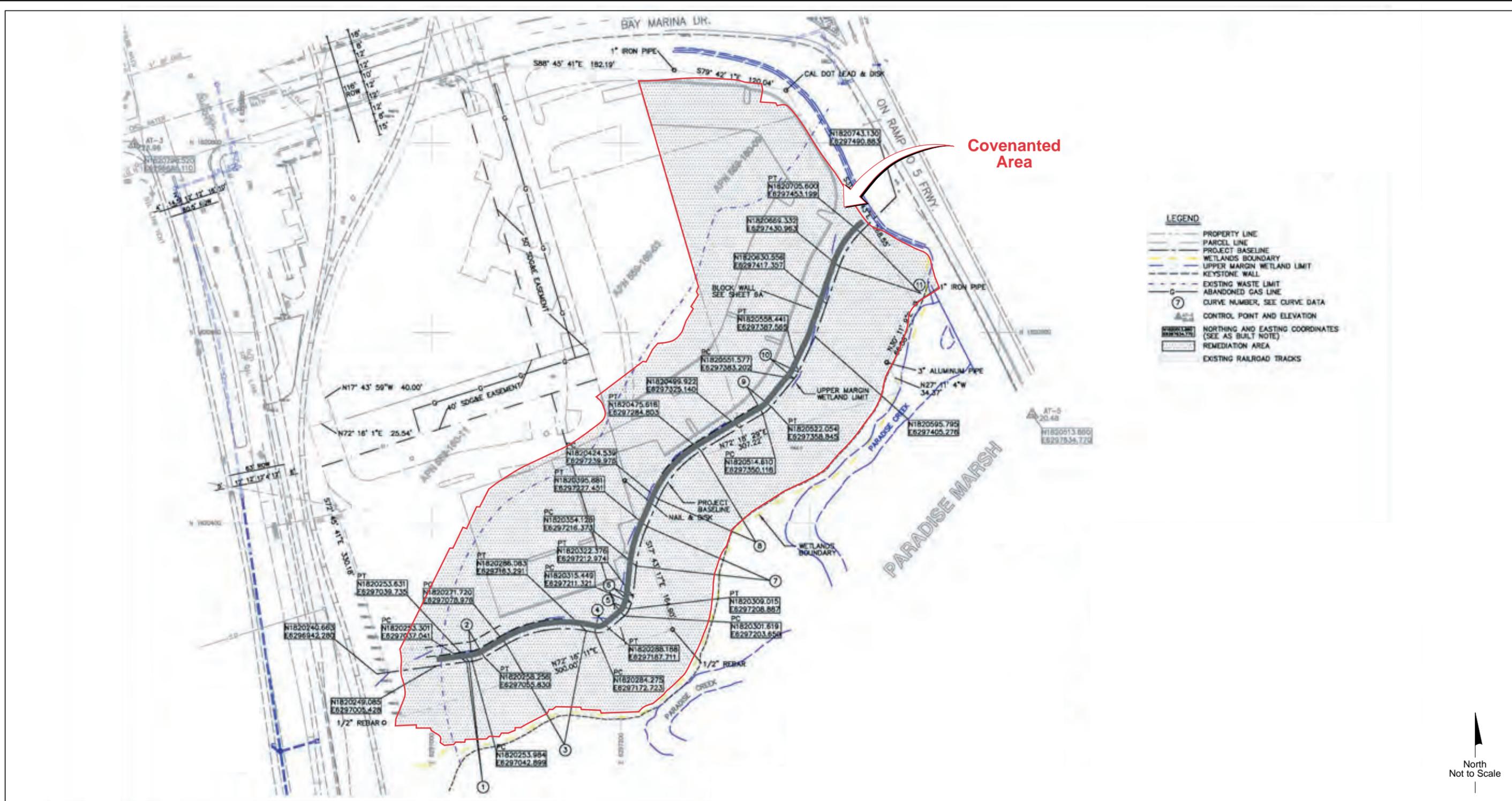
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Also excepting from that portion lying within Lots 18, 19, 20, and 23 in Block 232 the title and exclusive right to all of the minerals and mineral ores of every kind and character now known to exist or hereafter discovered upon, within or underlying said land or that may be produced therefrom, including, without limiting the generality of the foregoing, all petroleum, oil, natural gas, and other hydrocarbon substances and products derived therefrom, together with the exclusive and perpetual right of said grantor, its successors and assigns, of ingress and egress beneath the surface of said land to explore for, extract, mine, and remove the same, and to make such use of the said land beneath the surface as is necessary or useful in connection therewith, which use may include lateral or slant drilling, boring, digging, or sinking, or wells, shafts, or tunnels; provided, however, that said grantor, its successors and assigns, shall not use the surface of said land in the exercise of any said rights, and shall not disturb the surface land or any improvements thereon.

EXHIBIT B

FIGURE DEPICTING LOCATION OF CAPPED PORTIONS OF THE PROPERTY.



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	PROJECT BASELINE
	WETLANDS BOUNDARY
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<p>SCS ENGINEERS Environmental Consultants 8799 Balboa Avenue, Suite 290 San Diego, California 92123</p>	<p>EXTENT OF COVENANTED AREA Community Development Commission of National City Marina Gateway Hotel Project Formerly Cleveland and Cuyamaca Properties 2501 and 2510 Cleveland Avenue National City, California</p>	<p>Project No.: 01203569.11</p>
	<p>Exhibit B</p>	<p>Date Drafted: 10/31/06</p>

SOIL BORING LOGS

SCS ENGINEERS

Environmental Consultants
8799 Balboa Avenue, Suite 290
San Diego, California 92123

BOREHOLE LOG

Number: **EBS1**

Client: **Community Development Commission** Job No: **11991789.50** Sheet: **1 of 1**

Location: **2501 Cleveland Avenue National City, California** Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **12/16/03** Date Drafted: **12/16/03** Drill Rig/Sampling Method: **Strataprobe/Split spoon sampler** Borehole Dia.: **1.5"** Quantity of Backfill: **0.417 cu. ft.** Total Depth: **34'**

SAMPLE LOG			BOREHOLE LOG				
Sample Number	Lab results TPH Gas/diesel/oil (ppm)	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.
			0				ALLUVIUM
			1				
			2				
			3				
			4		SM		
EBS1-5	ND/ND/ND	NA	5				Light yellowish-brown (10 YR 6/4) to yellowish-brown (10 YR 5/4), SILTY SAND with some clay, fine-grained, poorly graded, slightly moist.
			6				
			7				
			8				
			9				
EBS1-10	ND/ND/ND	NA	10		SW		Very pale brown (10 YR 8/3 to 7/4), fine- to coarse-grained SAND, well graded, dry.
			11				
			12				
			13				
			14				
EBS1-15	ND/ND/ND	NA	15				Dark grayish-brown (10 YR 4/2) to brown (10 YR 5/3 to 4/3), SILTY, fine- to medium-grained SAND, poorly graded, slightly moist.
			16				
			17		SM		
			18				
			19				
EBS1-20	ND/ND/ND	NA	20				Grayish-brown (10 YR 5/2) to brown (10 YR 5/3), fine- to medium-grained SAND with silt, poorly graded, dry.
			21				
			22				
			23				
			24				
EBS1-25	ND/ND/ND	NA	25				Light brownish-gray (10 YR 6/2) to pale brown (10 YR 6/3), fine- to coarse-grained SAND, well graded, dry.
			26				
EBS1-27	ND/ND/ND	NA	27				Dark grayish-brown (10 YR 4/2) to dark yellowish-brown (10 YR 4/4), fine- to coarse-grained SAND with some silt and gravel, well graded, very moist.
			28				
EBS1-29	ND/ND/ND	NA	29		SW		
			30				<i>Interpreted water table</i> ▼
EBS1-31	ND/ND/ND	NA	31				Dark grayish-brown (10 YR 4/2) to dark yellowish-brown (10 YR 4/4), fine- to coarse-grained SAND with some silt and gravel, well graded, saturated.
			32				
			33				
			34				
			35				Boring terminated at 34 feet below grade. Backfilled with 3/4 bag of #16 bentonite chips.

Backfill Log

Bentonite Chips

Logged by: Nicki Field Title: Project Professional Date: 12/16/03
 Reviewed by: Tessa McRae License no: 6582 Date: 1/28/04

SCS ENGINEERS

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8799 Balboa Avenue, Suite 290
San Diego, California 92123

BOREHOLE LOG

Number: **EBS2**

Client: **Community Development Commission**

Job No: **11991789.50**

Sheet: **1 of 1**

Location: **2501 Cleveland Avenue
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **12/16/03**

Date Drafted: **12/16/03**

Drill Rig/Sampling Method: **Strataprobe/Split spoon sampler**

Borehole Dia.: **1.5"**

Quantity of Backfill: **0.417 cu. ft.**

Total Depth: **34'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results TPH Gas/diesel/oil (ppm)	Blows per foot	Depth (feet)	Sample interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
			0				FILL	
			1					
			2					
			3		SC			
			4					
EBS2-5	ND/ND/ND	NA	5				Dark grayish-brown (10 YR 4/2) to brown (10 YR 4/3), CLAYEY , fine-grained SAND with silt, poorly graded, dry.	
			6					
			7					
			8					
EBS2-10	ND/36/280	NA	10		SM		Black (10 YR 2/1), to very dark brown (10 YR 2/2), SILTY , fine-grained SAND with brick fragments and apparent burn ash, poorly graded, slightly moist, slight burnt odor.	
			11					
			12					
			13					
EBS2-15	ND/ND/ND	NA	15		SM		ALLUVIUM: Dark grayish-brown (10 YR 4/2) to brown (10 YR 4/3), SILTY , fine- to coarse-grained SAND with minor clay, well graded, slightly moist.	
			16					
			17					
			18					
EBS2-20	ND/ND/ND	NA	20				Pale brown (10 YR 6/3) to light yellowish-brown (10 YR 6/4), fine- to coarse-grained SAND with minor clay, well graded, dry.	
			21					
			22					
			23					
EBS2-25	ND/ND/ND	NA	25		SW		Pale brown (10 YR 6/3) to light yellowish-brown (10 YR 6/4), fine- to coarse-grained SAND with minor silt, well graded, dry.	
			26					
			27					
			28				<i>Interpreted water table</i> ▼	
EBS2-30	ND/ND/ND	NA	30				Brown (10 YR 4/3) to dark yellowish-brown (10 YR 4/4), fine- to coarse-grained SAND , well graded, saturated.	
			31					
EBS2-32	ND/ND/ND	NA	32		CL		Dark gray (10 YR 4/1) to dark grayish-brown (10 YR 4/2) CLAY , moist.	
			33					
			34					
			35				Boring terminated at 34 feet below grade. Backfilled with 3/4 bag of #16 bentonite chips.	

Logged by: Nicki Field

Title: Project Professional

Date: 12/16/03

Reviewed by: Tessa McRae

License no: 6582

Date: 1/28/04

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San Diego, California 92123

BOREHOLE LOG

Number: **EBS3**

Client: Community Development Commission Job No: 11991789.50 Sheet: 1 of 2

Location: 2501 Cleveland Avenue National City, California Drilling Company: H&P Mobile Geochemistry

EBS Rep: Nicki Field

Date Drilled: 12/16/03 Date Drafted: 12/16/03 Drill Rig/Sampling Method: Strataprobe/Split spoon sampler Borehole Dia.: 1.5" Quantity of Backfill: 0.47 cu. ft. Total Depth: 38'

SAMPLE LOG			BOREHOLE LOG				Backfill Log
Sample Number	Lab results TPH Gas/diesel/oil (ppm)	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	
			0				FILL
			1				
			2				
			3				
			4				
EBS3-5	ND/ND/ND	NA	5	4-5	SM		Yellowish-brown (10 YR 5/4) to dark yellowish-brown (10 YR 4/4), SANDY SILT with brick and asphalt fragments, dry.
			6				
			7				
			8				
			9				Yellowish-brown (10 YR 5/4 to 5/6), SANDY SILT, dry.
EBS3-10	ND/ND/ND	NA	10	9-10			
			11				
			12				ALLUVIUM
			13				
			14				
EBS3-15	ND/ND/ND	NA	15	14-15	SP		Light brownish gray (10 YR 6/2) to pale brown (10 YR 6/3), fine-grained SAND, poorly graded, dry.
			16				
			17				
			18				
			19				
EBS3-20	ND/ND/ND	NA	20	19-20			Light yellowish-brown (10 YR 6/4) to yellowish-brown (10 YR 5/4), fine- to medium-grained SAND with minor clay, poorly graded, dry.
			21				
			22				
			23				
			24				
EBS3-25	ND/ND/ND	NA	25	24-25	SW		White (10 YR 8/1) to very pale brown (10 YR 8/2), very fine- to coarse-grained SAND, well graded, dry.
			26				
			27				
			28				
			29				
EBS3-30	86/38/ND	NA	30	29-30			Dark gray (10 YR 4/1) to brown (10 YR 4/3) CLAY, moist.
			31				
EBS3-32	ND/ND/ND	NA	32	31-32	CL		Dark gray (10 YR 4/1) to brown (10 YR 4/3) CLAY with minor sand, moist.
			33				
			34				
EBS3-36	ND/ND/ND	NA	35	34-35			Dark gray (10 YR 4/1) to brown (10 YR 4/3) CLAY, moist.

Logged by: Nicki Field Title: Project Professional Date: 12/16/03
Reviewed by: Tessa McRae License no: 6582 Date: 1/28/04

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San Diego, California 92123

BOREHOLE LOG

Number: **EBS3**

Client: **Community Development Commission** Job No: **11991789.50** Sheet: **2 of 2**

Location: **2501 Cleveland Avenue
National City, California** Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **12/16/03** Date Drafted: **12/16/03** Drill Rig/Sampling Method: **Strataprobe/Split spoon sampler** Borehole Dia.: **1.5"** Quantity of Backfill: **0.47 cu. ft.** Total Depth: **38'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results TPH Gas/diesel/oil (ppm)	Blows per foot	Depth (feet)	Sample interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Bentonite Chips	Backfill Log
			36						
			37		CL				
			38						
			39				Boring terminated at 38 feet below grade. Backfilled with 1 bag of #16 bentonite chips.		
			40						
			41						
			42						
			43						
			44						
			45						
			46						
			47						
			48						
			49						
			50						
			51						
			52						
			53						
			54						
			55						
			56						
			57						
			58						
			59						
			60						
			61						
			62						
			63						
			64						
			65						
			66						
			67						
			68						
			69						
			70						
			71						

Logged by: Nicki Field Title: Project Professional Date: 12/16/03
 Reviewed by: Tessa McRae License no: 6582 Date: 1/28/04

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San Diego, California 92123

BOREHOLE LOG

Number: **EBS4**

Client: **Community Development Commission** Job No: **11991789.50** Sheet: **1 of 2**

Location: **2501 Cleveland Avenue
National City, California** Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **12/16/03** Date Drafted: **12/16/03** Drill Rig/Sampling Method: **Strataprobe/Split spoon sampler** Borehole Dia.: **1.5"** Quantity of Backfill: **0.54 cu. ft.** Total Depth: **44'**

SAMPLE LOG			BOREHOLE LOG				Backfill Log
Sample Number	Lab results TPH Gas/diesel/oil (ppm)	Blows per foot	Depth (feet)	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	
			0			FILL	
			1				
			2				
			3				
			4	SM			
EBS4-5	ND/ND/ND	NA	5			Grayish-brown (10 YR 5/2) to brown (10 YR 5/3), SILTY, fine- to coarse-grained SAND with minor clay, well graded, dry.	
			6				
			7				
			8				
			9			ALLUVIUM	
EBS4-10	ND/ND/ND	NA	10			Grayish-brown (10 YR 5/2) to brown (10 YR 5/3), fine- to coarse-grained SAND, well graded, dry.	
			11				
			12				
			13				
			14				
EBS4-15	ND/ND/ND	NA	15				
			16				
			17	SW			
			18				
EBS4-20	ND/ND/ND	NA	19				
			20				
			21				
			22				
			23				
EBS4-25	ND/ND/ND	NA	24				
			25			Brown (10 YR 5/3) to yellowish-brown (10 YR 5/4), SILTY, fine- to coarse-grained SAND with minor silt and gravel, moist.	
			26				
			27				
			28				
EBS4-30	75/35/40	NA	29				
			30			Dark grayish-brown (10 YR 4/2) to brown (10 YR 4/3) CLAY, moist.	
			31				
			32	CL			
			33				
			34				
EBS4-35	ND/ND/ND	NA	35			Dark grayish-brown (10 YR 4/2) to brown (10 YR 4/3) CLAY, saturated.	

Logged by: Nicki Field Title: Project Professional Date: 12/16/03
 Reviewed by: Tessa McRae License no: 6582 Date: 1/28/04

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BOREHOLE LOG

Number: **EBS4**

Client: **Community Development Commission**

Job No: **11991789.50**

Sheet: **2 of 2**

Location: **2501 Cleveland Avenue
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **12/16/03** Date Drafted: **12/16/03**
Drill Rig/Sampling Method: **Strataprobe/Split spoon sampler**

Borehole Dia.: **1.5"** Quantity of Backfill: **0.54 cu. ft.** Total Depth: **44'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results TPH Gas/diesel/oil (ppm)	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.
			36				
			37		CL		Dark grayish-brown (10 YR 4/2) to brown (10 YR 4/3) CLAY, saturated.
			38				
EBS4-40	ND/ND/ND	NA	39				
			40		ML		Dark grayish brown (10 YR 4/2) to very dark grayish-brown (10 YR 5/2), SILTY, fine-grained SAND, poorly graded, saturated.
			41				
			42				
			43				
			44				
			45				Boring terminated at 44 feet below grade. Backfilled with 1 bag of #16 bentonite chips.
			46				
			47				
			48				
			49				
			50				
			51				
			52				
			53				
			54				
			55				
			56				
			57				
			58				
			59				
			60				
			61				
			62				
			63				
			64				
			65				
			66				
			67				
			68				
			69				
			70				
			71				

Backfill Log
Bentonite Chips

Logged by: Nicki Field Title: Project Professional Date: 12/16/03
Reviewed by: Tessa McRae License no: 6582 Date: 1/28/04

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San Diego, California 92123

BOREHOLE LOG

Number: **EBS5**

Client: **Community Development Commission**

Job No: **01203569.07**

Sheet: **1 of 1**

Location: **2501 and 2510 Cleveland Ave.
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **7/28/04**

Date Drafted: **7/28/04**

Drill Rig/Sampling Method: **Strataprobe rig with split-spoon sampler**

Borehole : **1.5"**

Quantity of Backfill: **0.25 ft³**

Total Depth: **20'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results VOCs	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
EBS5-0.5'	ND		0		GM		FILL: GRAVEL/SILT/SAND mixture, pale yellow (2.5 Y 8/2), loose, dry. Thin layer of same material with possible pieces of asphalt, very dark gray (2.5 Y 3/1). PID @ 0.5 ppm.	Soil
EBS5-5'	ND		3		SM		ALLUVIUM: SILTY, fine- to medium-grained SAND with slight clay, dark brown (10 YR 3/3), loose, moist. Same, yellowish-brown (10 YR 5/4). PID @ 0.1 ppm.	
EBS5-10'	ND		9		SP		Fine-grained SAND with trace silt, brown (10 YR 4/4), loose, moist. PID @ 0.1 ppm.	
EBS5-15'	ND		15		SP		Same. PID @ 0.0 ppm.	
EBS5-19.5'	ND		19.5				Fine- to medium-grained SAND, pale brown (10 YR 6/3), loose, dry. PID @ 0.1 ppm.	
			20				Boring terminated at approximately 20 feet below grade. Boring backfilled with approximately 3/4 bag of No. 16 bentonite granules.	Bentonite Granules
			21					
			22					
			23					
			24					
			25					
			26					
			27					
			28					
			29					
			30					
			31					
			32					
			33					
			34					
			35					

Logged by: Nicki Field
Reviewed by: Tessa McRae

Title: Project Professional
License no: 6582

Date: 7/28/04
Date: 8/11/04

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San Diego, California 92123

BOREHOLE LOG

Number: **EBS6**

Client: **Community Development Commission**

Job No: **01203569.07**

Sheet: **1 of 1**

Location: **2501 and 2510 Cleveland Ave.
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **7/28/04**

Date Drafted: **7/28/04**

Drill Rig/Sampling Method: **Strataprobe rig with split-spoon sampler**

Borehole : **1.5"**

Quantity of Backfill: **0.25 ft³**

Total Depth: **20'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results VOCs	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
EBS6-0.5'	ND		0				FILL: GRAVEL/SILT/SAND mixture, pale yellow (2.5 Y 7/3), loose, dry. Same with pieces of asphalt, very dark gray (2.5 Y 3/1) to very dark grayish-brown (2.5 Y 3/2). PID @ 0.1 ppm.	Soil
			1		GM			
			2					
EBS6-5'	ND		4				ALLUVIUM: SILTY, fine-grained SAND with slight clay, yellowish-brown (10 YR 5/6), somewhat dense, moist. PID @ 0.0 ppm.	Bentonite Granules
			5		SM			
			6					
EBS6-10'	ND		10				Fine, SANDY SILT, yellowish-brown (10 YR 5/6), somewhat dense, moist. PID @ 0.0 ppm.	
			11					
			12					
EBS6-15'	ND		14				Fine- to medium-grained SAND with silt and slight gravel, brown (10 YR 5/3), loose, moist. PID @ 0.1 ppm.	
			15		SP			
			16					
EBS6-19.5'	ND		19				Fine- to coarse-grained SAND, brown (10 YR 5/3) to yellowish-brown (10 YR 5/4), loose, dry. PID @ 0.0 ppm.	
			20		SW			
			21					
			22				Boring terminated at approximately 20 feet below grade. Boring backfilled with approximately 3/4 bag of No. 16 bentonite granules.	
			23					
			24					
			25					
			26					
			27					
			28					
			29					
			30					
			31					
			32					
			33					
			34					
			35					

Logged by: Nicki Field

Title: Project Professional

Date: 7/28/04

Reviewed by: Tessa McRae

License no: 6582

Date: 8/11/04

SCS ENGINEERS

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BOREHOLE LOG

Number: **EBS7**

Client:
Community Development Commission

Job No:
01203569.07

Sheet:
1 of 1

Location:
2501 and 2510 Cleveland Ave.
National City, California

Drilling Company:
H&P Mobile Geochemistry

EBS Rep: Nicki Field

Date Drilled:
7/28/04

Date Drafted:
7/28/04

Drill Rig/Sampling Method:
Strataprobe rig with split-spoon sampler

Borehole :
1.5"

Quantity of Backfill:

Total Depth:
2.5'

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results VOCs	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
EBS7-0.5'	ND		0		GM		FILL: GRAVEL/SILT/SAND mixture, light gray (2.5 Y 7/2), loose, dry. PID @ 0.1 ppm.	
			1					
			2					
			3					
			4					
			5					
			6					
			7					
			8					
			9					
			10					
			11					
			12					
			13					
			14					
			15					
			16					
			17					
			18					
			19					
			20					
			21					
			22					
			23					
			24					
			25					
			26					
			27					
			28					
			29					
			30					
			31					
			32					
			33					
			34					
			35					

Logged by: Nicki Field

Title: Project Professional

Date: 7/28/04

Reviewed by: Tessa McRae

License no: 6582

Date: 8/11/04

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BOREHOLE LOG

Number: **EBS8**

Client: **Community Development Commission**

Job No: **01203569.07**

Sheet: **1 of 1**

Location: **2501 and 2510 Cleveland Ave.
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **7/28/04**

Date Drafted: **7/28/04**

Drill Rig/Sampling Method: **Strataprobe rig with split-spoon sampler**

Borehole : **1.5"**

Quantity of Backfill: **0.25 ft³**

Total Depth: **20'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results VOCs	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
EBS8-0.5'	ND		0				ALLUVIUM: SILT, brown (7.5 YR 5/3), loose, dry. PID @ 0.1 ppm.	Soil
			1					
			2					
			3					
EBS8-5'	ND		4		ML		Fine, SANDY SILT, yellowish-brown (10 YR 5/4), dense, moist. PID @ 0.0 ppm.	Bentonite Granules
			5					
			6					
			7					
EBS8-10'	ND		8		SP		SILT, yellowish-brown (10 YR 5/4) with yellowish-red portions (5 YR 5/8), loose, slight moisture. PID @ 0.0 ppm.	
			9					
			10					
			11					
EBS8-15'	ND		12		SP		Fine- to medium-grained SAND, light yellowish-brown (10 YR 6/4) to brownish-yellow (10 YR 6/6), loose, dry. PID @ 0.0 ppm.	
			13					
			14					
			15					
EBS8-19.5'	ND		16		SP		Same, yellowish-brown (10 YR 5/4). PID @ 0.0 ppm.	
			17					
			18					
			19					
			20				Boring terminated at approximately 20 feet below grade. Boring backfilled with approximately 3/4 bag of No. 16 bentonite granules.	
			21					
			22					
			23					
			24					
			25					
			26					
			27					
			28					
			29					
			30					
			31					
			32					
			33					
			34					
			35					

Logged by: Nicki Field
Reviewed by: Tessa McRae

Title: Project Professional
License no: 6582

Date: 7/28/04
Date: 8/11/04

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San Diego, California 92123

BOREHOLE LOG

Number: **EBS9**

Client: **Community Development Commission**

Job No: **01203569.07**

Sheet: **1 of 1**

Location: **2501 and 2510 Cleveland Ave.
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **7/28/04**

Date Drafted: **7/28/04**

Drill Rig/Sampling Method: **Strataprobe rig with split-spoon sampler**

Borehole : **1.5"**

Quantity of Backfill: **2.5'**

Total Depth: **2.5'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results VOCs	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
EBS9-0.5'	ND		0		GM		FILL: GRAVEL/SILT/SAND mixture, light yellowish-brown (2.5 Y 6/3), loose, dry. PID @ 0.5 ppm.	
			1				Refusal encountered at approximately 2.5 feet below grade. Boring backfilled with approximately 1/10 bag of No. 16 bentonite granules.	
			2					
			3					
			4					
			5					
			6					
			7					
			8					
			9					
			10					
			11					
			12					
			13					
			14					
			15					
			16					
			17					
			18					
			19					
			20					
			21					
			22					
			23					
			24					
			25					
			26					
			27					
			28					
			29					
			30					
			31					
			32					
			33					
			34					
			35					

Logged by: Nicki Field

Title: Project Professional

Date: 7/28/04

Reviewed by: Tessa McRae

License no: 6582

Date: 8/11/04

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San Diego, California 92123

BOREHOLE LOG

Number: **EBS9a**

Client: **Community Development Commission**

Job No: **01203569.07**

Sheet: **1 of 1**

Location: **2501 and 2510 Cleveland Ave.
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **7/28/04**

Date Drafted: **7/28/04**

Drill Rig/Sampling Method: **Strataprobe rig with split-spoon sampler**

Borehole : **1.5"**

Quantity of Backfill: **0.25 ft³**

Total Depth: **20'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results VOCs	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
			0					
			1		GM		FILL: GRAVEL/SILT/SAND mixture, light yellowish-brown (2.5 Y 6/3), loose, dry.	
			2					
			3					
EBS9a-5'	ND		4				ALLUVIUM: Fine, SANDY SILT, yellowish-brown (10 YR 5/4), dense, moist. PID @ 0.1 ppm.	
			5					
			6		ML			
			7					
			8					
EBS9a-10'	ND		9				SILT, yellowish-brown (10 YR 5/6), somewhat dense, moist. PID @ 0.1 ppm.	
			10					
			11					
			12					
EBS9a-15'	ND		13					
			14		SP		Fine- to medium-grained SAND, brown (10 YR 5/3), loose, dry. PID @ 0.0 ppm.	
			15					
			16					
			17					
			18					
EBS9a-19.5'	ND		19		SW		Fine- to coarse-grained SAND, pale brown (10 YR 6/3) to light yellowish-brown (10 YR 6/4), loose, dry. PID @ 0.4 ppm.	
			20				Boring terminated at approximately 20 feet below grade. Boring backfilled with approximately 3/4 bag of No. 16 bentonite granules.	
			21					
			22					
			23					
			24					
			25					
			26					
			27					
			28					
			29					
			30					
			31					
			32					
			33					
			34					
			35					

Logged by: Nicki Field

Title: Project Professional

Date: 7/28/04

Reviewed by: Tessa McRae

License no: 6582

Date: 8/11/04

SCS ENGINEERS

Environmental Consultants
8799 Balboa Avenue, Suite 290
San Diego, California 92123

BOREHOLE LOG

Number: **EBS10**

Client: **Community Development Commission**

Job No: **01203569.07**

Sheet: **1 of 1**

Location: **2501 and 2510 Cleveland Ave.
National City, California**

Drilling Company: **H&P Mobile Geochemistry**

EBS Rep: **Nicki Field**

Date Drilled: **7/28/04**

Date Drafted: **7/28/04**

Drill Rig/Sampling Method: **Strataprobe rig with split-spoon sampler**

Borehole : **1.5"**

Quantity of Backfill: **0.25 ft³**

Total Depth: **20'**

SAMPLE LOG

BOREHOLE LOG

Sample Number	Lab results VOCs	Blows per foot	Depth (feet)	Sample Interval	USCS symbol	Graphic Log	Geologic Description: Formation, soil type, color, grain, minor soil component, moisture, density, odor, etc.	Backfill Log
EBS10-0.5'	ND		0		GM		FILL: GRAVEL/SILT/SAND mixture, light yellowish-brown (2.5 Y 6/3), loose, dry. PID @ 0.5 ppm.	
			1					
			2					
			3					
EBS10-5'	ND		4		ML		ALLUVIUM: SANDY SILT with slight clay, dark yellowish-brown (10 YR 4/6) with yellowish-red portions (5 YR 5/8), dense, moist. PID @ 0.7 ppm.	
			5					
			6					
			7					
			8					
			9					
EBS10-10'	ND		10				Fine, SANDY SILT, dark yellowish-brown (10 YR 4/6), somewhat dense, moist. PID @ 0.8 ppm.	
			11					
			12					
			13					
EBS10-15'	ND		14		SP		Fine- to medium-grained SAND, brown (10 YR 5/3), loose, dry. PID @ 0.7 ppm.	
			15					
			16					
			17					
			18					
EBS10-19.5'	ND		19				Same. PID @ 0.4 ppm.	
			20					
			21				Boring terminated at approximately 20 feet below grade. Boring backfilled with approximately 3/4 bag of No. 16 bentonite granules.	
			22					
			23					
			24					
			25					
			26					
			27					
			28					
			29					
			30					
			31					
			32					
			33					
			34					
			35					

Logged by: Nicki Field

Title: Project Professional

Date: 7/28/04

Reviewed by: Tessa McRae

License no: 6582

Date: 8/11/04

**MONITORING WELL
CONSTRUCTION DETAILS**

MONITORING WELL CONSTRUCTION DETAILS

Standard Operating Procedure Number 4, Figure 1
Revision A. 2/11/00

SCS ENGINEERS

8799 Balboa Avenue, Suite 290
San Diego, California 92123

STAND PIPE or RISER WELL

PROJECT NUMBER: <u>01203569.11</u>	BORING / WELL NUMBER: <u>CDC3</u>
SITE: <u>2501 and 2510 Cleveland Ave, National City</u>	CLIENT: <u>Community Development Commission</u>
COUNTY & PERMIT #: <u>San Diego LMON103774</u>	DATE OF INSTALLATION: <u>6/13/06</u>
DRILLER: <u>Tri-County Drilling</u>	PREPARED BY: <u>Nicki Field</u>

	<h3 style="text-align: center;">CONSTRUCTION DETAILS</h3> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">Surface Elevation</td> <td style="text-align: right;">28.7 ft.</td> </tr> <tr> <td>Top of Casing Elevation</td> <td style="text-align: right;">31.71 ft.</td> </tr> <tr> <td>A. Total Depth</td> <td style="text-align: right;">38 ft.</td> </tr> <tr> <td>B. Boring Diameter</td> <td style="text-align: right;">8 in.</td> </tr> <tr> <td>C. Casing Length</td> <td style="text-align: right;">36 ft.</td> </tr> <tr> <td>Casing Material</td> <td style="text-align: right;">PVC</td> </tr> <tr> <td>D. Casing Diameter</td> <td style="text-align: right;">2 in.</td> </tr> <tr> <td>E. Depth to Top of Screen</td> <td style="text-align: right;">21 ft.</td> </tr> <tr> <td>F. Screen Length</td> <td style="text-align: right;">15 ft.</td> </tr> <tr> <td>Screen (slot) Size</td> <td style="text-align: right;">0.020 in.</td> </tr> <tr> <td>G. Depth to top of Filter Pack</td> <td style="text-align: right;">19 ft.</td> </tr> <tr> <td>Filter Pack Material</td> <td style="text-align: right;">#3 sand</td> </tr> <tr> <td>H. Depth to top of Seal</td> <td style="text-align: right;">15.5 ft.</td> </tr> <tr> <td>Seal Material</td> <td style="text-align: right;">medium bentonite chips</td> </tr> <tr> <td>I. Depth to Top of Fill Material</td> <td style="text-align: right;">3 ft.</td> </tr> <tr> <td>Annular Fill Material</td> <td style="text-align: right;">bentonite grout/chips</td> </tr> <tr> <td>J. Surface Seal Dimensions</td> <td style="text-align: right;">5 ft.</td> </tr> <tr> <td>Radial or Square or Other</td> <td style="text-align: right;">square</td> </tr> <tr> <td>Surface Seal Material</td> <td style="text-align: right;">concrete</td> </tr> <tr> <td>K. Type and Size of Protective Casing:</td> <td></td> </tr> <tr> <td>Steel monument casing</td> <td></td> </tr> <tr> <td>Notes or comments:</td> <td></td> </tr> </table>	Surface Elevation	28.7 ft.	Top of Casing Elevation	31.71 ft.	A. Total Depth	38 ft.	B. Boring Diameter	8 in.	C. Casing Length	36 ft.	Casing Material	PVC	D. Casing Diameter	2 in.	E. Depth to Top of Screen	21 ft.	F. Screen Length	15 ft.	Screen (slot) Size	0.020 in.	G. Depth to top of Filter Pack	19 ft.	Filter Pack Material	#3 sand	H. Depth to top of Seal	15.5 ft.	Seal Material	medium bentonite chips	I. Depth to Top of Fill Material	3 ft.	Annular Fill Material	bentonite grout/chips	J. Surface Seal Dimensions	5 ft.	Radial or Square or Other	square	Surface Seal Material	concrete	K. Type and Size of Protective Casing:		Steel monument casing		Notes or comments:	
Surface Elevation	28.7 ft.																																												
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Prepared by: Nicki M. Field	Date: 10/12/06	Reviewed by:	Date																																										

MONITORING WELL CONSTRUCTION DETAILS

Standard Operating Procedure Number 4, Figure 1
Revision A. 2/11/00

SCS ENGINEERS

8799 Balboa Avenue, Suite 290
San Diego, California 92123

STAND PIPE or RISER WELL

<p>PROJECT NUMBER: <u>01203569.11</u> BORING / WELL NUMBER: <u>CDC4</u></p> <p>SITE: <u>2501 and 2510 Cleveland Ave. National City</u> CLIENT: <u>Community Development Commission</u></p> <p>COUNTY & PERMIT #: <u>San Diego LMON103774</u> DATE OF INSTALLATION: <u>6/14/06</u></p> <p>DRILLER: <u>Tri-County Drilling</u> PREPARED BY: <u>Nicki Field</u></p>	<p style="text-align: center;">CONSTRUCTION DETAILS</p> <p>Surface Elevation <u>30.2</u> ft.</p> <p>Top of Casing Elevation <u>32.97</u> ft.</p> <p>A. Total Depth <u>40</u> ft.</p> <p>B. Boring Diameter <u>8</u> in.</p> <p>C. Casing Length <u>38</u> ft.</p> <p> Casing Material <u>PVC</u></p> <p>D. Casing Diameter <u>2</u> in.</p> <p>E. Depth to Top of Screen <u>23</u> ft.</p> <p>F. Screen Length <u>15</u> ft.</p> <p> Screen (slot) Size <u>0.010</u> in.</p> <p>G. Depth to top of Filter Pack <u>21</u> ft.</p> <p> Filter Pack Material <u>#3 sand</u></p> <p>H. Depth to top of Seal <u>17.5</u> ft.</p> <p> Seal Material <u>medium bentonite chips</u></p> <p>I. Depth to Top of Fill Material <u>3</u> ft.</p> <p> Annular Fill Material <u>bentonite grout/chips</u></p> <p>J. Surface Seal Dimensions <u>5</u> ft.</p> <p> Radial or Square or Other <u>square</u></p> <p> Surface Seal Material <u>concrete</u></p> <p>K. Type and Size of Protective Casing: <u>Steel monument casing</u></p> <p>Notes or comments:</p>		
<p>Prepared by: Nicki M. Field</p>	<p>Date 10/12/06</p>	<p>Reviewed by:</p>	<p>Date</p>

MONITORING WELL CONSTRUCTION DETAILS

Standard Operating Procedure Number 4, Figure 1
Revision A. 2/11/00

SCS ENGINEERS

8799 Balboa Avenue, Suite 290
San Diego, California 92123

STAND PIPE or RISER WELL

PROJECT NUMBER: 01203569.11

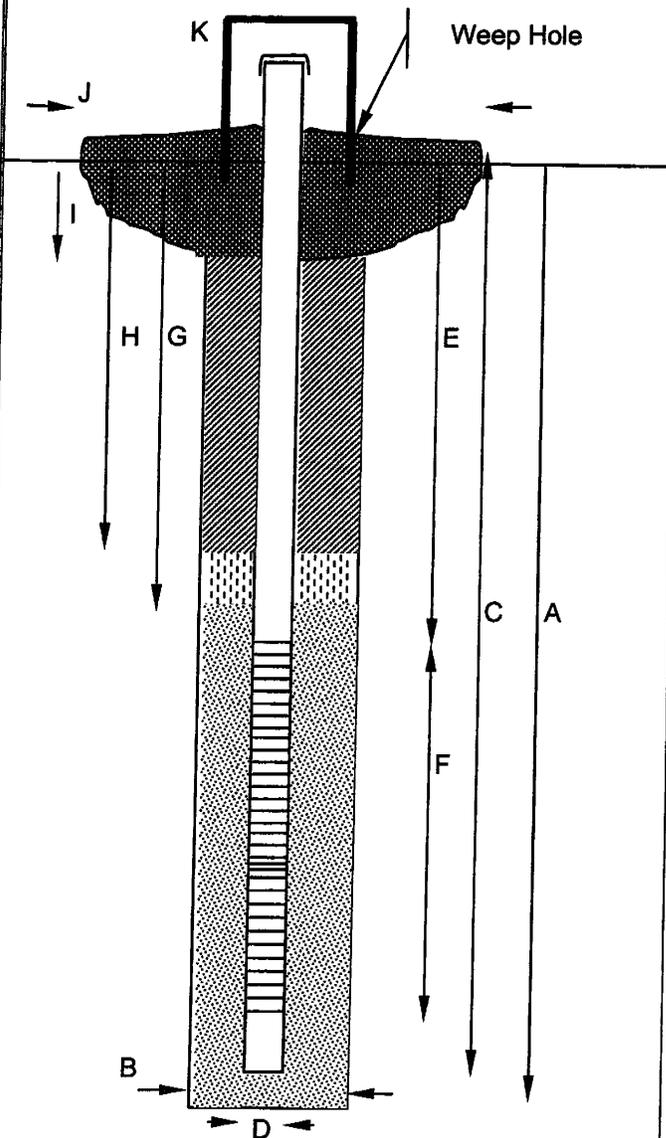
BORING / WELL NUMBER: CDC5

SITE: 2501 and 2510 Cleveland Ave. National City CLIENT: Community Development Commission

COUNTY & PERMIT #: San Diego LMON103774 DATE OF INSTALLATION: 6/13/06

DRILLER: Tri-County Drilling

PREPARED BY: Nicki Field



CONSTRUCTION DETAILS

Surface Elevation	<u>31.7</u> ft.
Top of Casing Elevation	<u>34.47</u> ft.
A. Total Depth	<u>40</u> ft.
B. Boring Diameter	<u>8</u> in.
C. Casing Length	<u>38</u> ft.
Casing Material	<u>PVC</u>
D. Casing Diameter	<u>2</u> in.
E. Depth to Top of Screen	<u>23</u> ft.
F. Screen Length	<u>15</u> ft.
Screen (slot) Size	<u>0.020</u> in.
G. Depth to top of Filter Pack	<u>21</u> ft.
Filter Pack Material	<u>#2/12 sand</u>
H. Depth to top of Seal	<u>18</u> ft.
Seal Material	<u>medium bentonite chips</u>
I. Depth to Top of Fill Material	<u>3</u> ft.
Annular Fill Material	<u>bentonite grout/chips</u>
J. Surface Seal Dimensions	<u>5</u> ft.
Radial or Square or Other	<u>square</u>
Surface Seal Material	<u>concrete</u>
K. Type and Size of Protective Casing:	
	<u>Steel monument casing</u>
Notes or comments:	

Prepared by:
Nicki M. Field

Date
10/12/06

Reviewed by:

Date

**STANDARD OPERATING
PROCEDURE FOR
SOIL VAPOR SAMPLING**

Soil Gas Sampling Procedures

Probe Construction and Insertion

Manually-Driven Probes

TEG/HP's manually driven soil vapor probes are constructed of 0.625 inch outside diameter steel and equipped with a hardened steel tip. The probes are nominally 5 feet long and can be threaded together to reach a depth of 10 feet below ground surface. An inert 1/8 inch nylaflow tube is threaded down the center of the probe and connected to a sampling port just above the tip. This internal sample tubing design eliminates any contact between the sample port and the gas sample.

The probe is driven into the ground by an electric rotary hammer. Once inserted to the desired depth, the probe is rotated approximately 3 turns to open the tip and exposes the vapor sampling ports. This design prevents clogging of the sampling ports and cross-contamination from soils during insertion.

Hydraulically-Driven Probes

TEG/HP's hydraulically-driven soil vapor probes are constructed of either 1.25 or 1.5 inch outside diameter steel and equipped with a hardened drop-off steel tip. The probes are nominally 4 feet long and threaded together to reach multiple depths. The probe is driven into the subsurface with TEG/HP's *STRATAPROBE™* system. Once inserted to the desired depth, the probe is retracted slightly to expose the vapor sampling port. A small diameter inert tubing is then inserted through the center of the rod and threaded into a gas tight fitting just above the tip. After a sample is obtained the tubing is removed, the probe advanced to the next depth or removed. This design prevents clogging of the sampling port and cross-contamination from soils during insertion.

Soil Gas Sampling

Soil vapor is withdrawn from the inert nylaflow tubing using a 20 cubic centimeter (cc) syringe connected via an on-off valve. The probe tip and sampling tubing are first purged by drawing and discarding 3 dead volumes of gas leaving the sample tubing filled with in-situ soil vapor. A sample of soil vapor is then withdrawn into a 5-cc and immediately transferred to the mobile lab for analysis within minutes of collection. The use of small calibrated syringes allowed for careful monitoring of purge and sample volumes. This procedure ensures adequate sample flow is obtained without excessive pumping of air or introduction of surface air into the sample.

If the time duration from sampling to analysis exceeds 30 minutes, soil gas samples are stored in gas-tight vials until analyzed.

Field Records

The field technician maintains a logsheet summarizing:

- Sample identification
- Probe location
- Date and time of sample collection
- Sampling depth
- Identity of samplers
- Weather conditions
- Sampling methods and devices
- Soil gas purge volumes
- Volume of soil gas extracted
- Observation of soil or subsurface characteristics (any condition that affects sample integrity)
- Apparent moisture content (dry, moist or saturated etc.) of the sampling zone
- Chain of custody protocols and records used to track samples from sampling point to analysis.

Analytical Methodology

Operating Conditions and Instrumentation

Halogenated, Aromatic Hydrocarbons & TPH by EPA Modified 8021 & 8015

Instrument: Shimadzu GC-14 or SRI 8610 Gas Chromatograph
Column: 30 to 75 meter DB-624, megabore capillary.
Carrier flow: Helium at 15 ml/min.
Detectors: Photoionization/Hall (EICD) or ECD detectors in series.
Detectors: Flame ionization detector on separate column.
Column oven: 45°C for 2 min, 45°C to 175°C at 5°C/min.

Halogenated, Aromatic & Total Hydrocarbons by EPA 8260

Instrument: Hewlett-Packard 6890/5973 or 5890/5972 GCMS
Column: 60 meter HP-624, 0.32mm x 1.8u.
Carrier flow: Helium at 15 ml/min.
Detectors: Quadrupole MS, full scan mode.
Column oven: 20°C for 1 min, 35°C to 230°C at 8°C/min.

Fixed and Biogenic Gases (O₂, CO₂, and Methane)

Instrument: SRI 8610 or Carle AGC 311 Gas Chromatograph
Column: 6 foot CTR
Carrier flow: Helium at 15 ml/min.
Detectors: Thermoconductivity (TCD) detectors.

Standard Preparation

Primary (stock) standards: Made from certified neat components or from traceable standards purchased from certified suppliers.

Secondary (working) Standards: Made by diluting primary standard. Typical concentrations are 1ug/ml, 10 ug/ml, and 50 ug/ml.

Laboratory Check Samples are prepared at the midpoint concentration from a standard purchased from a source different than the primary standards.

Lot numbers and preparations of all standards are recorded on a log sheet and kept in the mobile laboratory.

Initial Multi-Point Calibration Curve

An initial calibration curve of a minimum of 3 points is performed:

- At the start of the project.
- When the GC column or operating conditions have changed
- When the daily mid-point calibration check cannot meet the requirements as specified below.

Calibration curves for each target component are prepared by analyzing low, mid, and high calibration standards covering the expected concentration range. The lowest standard concentration will not exceed 5 times the reporting limit for each compound.

A linearity check of the calibration curve for each compound is performed by computing a correlation coefficient and an average response factor. If a correlation coefficient of 0.990 or a percent relative standard deviation (%RSD) of $\pm 20\%$ is obtained, an average response factor is used over the entire calibration range. If the linearity criteria are not obtained, quantitation for that analyte is performed using a calibration curve.

After each initial multi-point calibration, the validity of the curve is further verified with a laboratory control standards (LCS) prepared at the mid-point of the calibration range. The LCS includes all target compounds and the response factor (RF) must fall within $\pm 20\%$ of the factor from the initial calibration curve.

Continuing Calibration (Daily Mid-point Calibration Check)

Continuing calibration standards prepared from a traceable source are analyzed at the beginning of each day. Acceptable continuing calibration agreement is set at $\pm 20\%$ to the average response factor from the calibration curve, except for freon, chloroethane, and vinyl chloride when a 25% agreement is required. When calibration checks fall outside this acceptable range for analytes detected on the site, corrective action, consisting of verification of the standard and/or a new calibration curve for the analytes out of specifications is performed by the on-site chemist.

The continuing calibration includes all compounds expected or detected at the site in addition to any specific compounds designated in the project workplan.

Detection Limits

Detection limits have been previously determined by the EPA method. Reporting limits for this program are defined as 5 times lower than the lowest concentration standard of the calibration curve, as follows:

Compound	Detector	Report Limit
Aromatic Hydrocarbons (BTEX):	PID	1 ug/l-vapor for each
Halogenated Hydrocarbons (Solvents)	EICD or ECD	1 ug/l-vapor for each
Fuel Hydrocarbons	FID	1 ppm vapor
Methane	FID	1 ppm vapor

Injection of Soil Gas Samples

Vapor samples are withdrawn from the probe sampling syringe with a 1 cc syringe and injected directly into a sampling port on the gas chromatograph. The injection syringe is flushed 2 times with the sample prior to injection. Injection syringes are flushed several times with clean air or discarded between injections.

Compound Identification and Quantification

All analyses are performed with multiple detectors on megabore capillary columns following EPA Method 8000 protocols, modified for soil vapor. Modifications from the EPA methods consist of a site-specific analyte list, lack of matrix spike samples, lack of surrogates, and changes in calibration protocols as described in this SOP. All compounds detected in the soil gas samples are identified by chromatographic retention time and quantified using the average response factor from the active calibration curve. The analytical configuration provides the required compound separation as well as dual-detector confirmation. Further confirmation is provided by a second analysis on all samples using a second column with a flame ionization detector (FID).

Laboratory Data Logs

The field chemist maintains injection and sample analysis records including date and time of analysis, sampler's name, chemist's name, sample ID number, concentrations of compounds detected, calibration data, and any unusual conditions.

Quality Control Procedures

Compliance With Standards

Sampling and analytical procedures used by TEG complied with the American Society for Testing and Materials' *Standard Guide for Soil Gas Monitoring in the Vadose Zone* (ASTM D5314-93).

Staff Responsibilities

Staff responsibilities regarding operating and quality assurance procedures are assigned as follows:

Field Supervisor/Chemist:

- daily maintenance, startup and calibration of analytical equipment
- daily performance of quality control protocol
- sample and QA/QC sample analysis
- preparation of standards for linearity checks
- sample collection
- Chain-of-Custody Report completion
- documentation of analyses, problems, QA, maintenance of project files
- preparation of preliminary analytical report

Laboratory Director Responsibility:

- preparation of SOPs and QA/QC protocol
- implementation of QA program and technical training of personnel
- document control, security and confidentiality
- technical application and development
- verification of project data completeness
- verification of QA/QC compliance
- verification of client requirements
- preparation of QA report to include: technical difficulties, QA/QC results and conclusions

Sampling Quality Control

Method Blanks

Prior to sampling each day, all components of the sampling system are checked for contamination by drawing ambient air from above ground through the sampling equipment, and injecting a sample into a gas chromatograph. The analysis results are compared to that of the ambient air and recorded in the data tables as blanks.

Sample Quality Control

Each sample is given a unique identification number specifying location and depth. Purge and sample volumes are monitored closely using small calibrated syringes to assure a proper flow of soil gas. This ensures a representative sample is obtained from the sample zone without excessive pumping, which could result in sampling of surface air.

Decontamination Procedures

To minimize the potential for cross-contamination between sites, all external soil vapor probe parts are wiped or washed cleaned of excess dirt and moisture with solvents or de-ionized water as appropriate. The probe's internal nylaflow tubing is purged with clean air between sampling locations or replaced as necessary. Sampling syringes are flushed with clean air after each use or replaced.

Corrective Action

Corrective action is taken when unexpected contaminant levels are detected. First duplicate samples are taken to verify the initial detection of petroleum hydrocarbons. If contamination is suspected, then the sample probes are disassembled, wiped cleaned of excess dirt and moisture, rinsed with deionized water, washed with Alconox and water, and rinsed again with deionized water. The sample tubing in the probe is replaced. Contaminated sampling syringes are discarded.

Analytical Quality Control

Method Blanks

Method blanks are performed at the start of each day by drawing clean air through the sampling equipment and analyzing. These blanks verify all components of the sampling and analytical system are free of contamination. Additional blanks are performed more often as appropriate depending upon the measured concentrations, at a minimum 1 every 20 samples. The results of all blank analyses are recorded in the data tables. If a blank shows a measurable amount of any target compound, the on-site chemist will investigate and determine the source, and resolve the contamination problem prior to analyzing any samples.

Duplicate Samples

Duplicate (repetitive) analysis of a sample is performed when inconsistent data are observed, but at least one every 20 samples. Because soil vapor duplicates can vary widely, nominal relative percent difference (RPD) acceptance criteria is \pm a factor of 2.

Continuing Calibration (Daily Mid-point Calibration Check)

Continuing calibration standards prepared from a traceable source are analyzed at the beginning of each day. Acceptable continuing calibration agreement is set at \pm 20% to the average response factor from the calibration curve, except for freon, chloroethane, and vinyl chloride when a 25% agreement is required. When calibration checks fall outside this acceptable range for analytes detected on the site, corrective action, consisting of verification of the standard and/or a new calibration curve for the analytes out of specifications, is performed by the on-site chemist.

The continuing calibration includes all compounds expected or detected at the site and any specific compounds designated in the project workplan.

Laboratory Check Samples (LCS)

Laboratory check samples, prepared at the midpoint concentration from a standard purchased from a source different than the calibration standards, are analyzed at the end of each day. Acceptance criteria is $\pm 20\%$ from the true value. If the LCS falls outside this acceptance range for analytes detected on site, corrective action, consisting of verification of the standard and/or a new calibration curve for the analytes out of specifications, is performed.